



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

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

Project Information

Project Name: Japantown-Peace-Plaza-&-Pagoda---1610-Geary-Bl---CPF-EDI-23

HEROS Number: 900000010343509

Responsible Entity (RE): SAN FRANCISCO, 1 Dr Carlton B Goodlett Pl Ste 200 San
Francisco CA, 94102

State / Local Identifier: California

RE Preparer: Lorena Guadiana

Certifying Office Brian Cheu
r:

Grant Recipient (if different than Responsible Entity): San Francisco Recreation and Parks
Department

Point of Contact: Toni Moran

Consultant (if applicable): Architectural Resources Group

Point of Contact: John Rusch

Project Location: 1610 Geary Blvd, San Francisco, CA 94115

Additional Location Information:
N/A

Direct Comments to:

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

The funding will be utilized for purposes of renovating the Japantown Peace Plaza and Pagoda in San Francisco. The scope of work for the project includes a renovation of the plaza and its associated amenities. The proposed project will incorporate fully accessible and meet ADA guidelines for accessible design and remedy the current deficiencies related to waterproofing and water intrusion. The overall proposed project improvements include: 1. Paving, including special paving areas; 2. Increased planting areas; 3. Increased seating opportunities; 4. Accessible seating opportunities; 5. Retained historic-cultural elements; 6. Increased lighting; 7. Increased usability during events; 8. Improved circulation system; 9. Seating Terraces; 10. Improved Geary Boulevard Edge; and 11. Renovating the Peace Pagoda. The Japantown Peace Plaza and Pagoda is in the Japantown community of SF, in Supervisorial District 5, bound by Post Street to the North, Geary Boulevard to the South, and the Japan Center Mall to the East and West. The park's area is approximately 32,000 square feet and sits atop an SFMTA-owned parking garage. The plaza was originally built in the 1960s and for much of its life it has suffered from water leaks into the garage below. Following a 2016 report by McGinnis Chen Architects that assessed the extent of repairs, it was determined that a full renovation of the plaza was needed to re-waterproof the entire structure below. These findings, coupled with overwhelming community activism to reinvigorate this critical public space into a space that they could continue to embrace framed the approach of the redesign. The intent of the project is to renovate and upgrade the plaza so that all existing infrastructure is repaired to remedy current deficiencies and site elements meet the current public needs, as well as all applicable codes and regulations. Unfortunately, a former 2000-2001 renovation did not successfully address water intrusion issues and the Plaza is still leaking water into the garage below. As part of the renovation, the garage structure of the Plaza will be reinforced to support the new features and the Peace Pagoda will be seismically upgraded. The new design seeks to provide the community with more functional access to the plaza, both for everyday and special event use, while harnessing the cultural symbolism that the Japantown Peace Plaza holds within the neighborhood, city, and region. The seismic reinforcement recommendations for the Japantown Peace Pagoda include: A. Four (0.5") steel reinforced tendons/cables that run externally along the long side of each column from the foundation (i.e., garage ceiling) to the roof, installed outside the carbon fiber wrapping. B. To reinforce the roof's seismic stability at every level, stainless steel plate reinforcement will be added to the connecting joints between existing adjoining concrete roof panels. Copper standing seam roof (over the existing concrete roof panels) will be removed and replaced to match original material in its entirety. C. Increased massing/depth on the horizontal roof ring beams where they are connected to the columns at each roof level, this includes a new deep circular ring beam at the top roof. D. Carbon fiber wrapping around each column, roughly 1" thick. The carbon fiber wrapping would run to the 3rd story roof. E. Five Fiber Reinforced Polymer (FRP) strips would run along each column until the 3rd story roof. Three FRP strips would run along the interior side of the column, two would run along the outer edge of each column. The strips would be anchored into the existing podium via three 36" deep pockets. The FRP strips would be located under the carbon fiber wrapping.

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

[1610 Geary Blvd - Project Location.pdf](#)

[1610 Geary Blvd - Google Maps.pdf](#)

Level of Environmental Review Determination:

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

58.34(a)(12)

58.35(a)(1)

58.35(a)(3)(iii)

Determination:

✓	This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR
	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain "Authority to Use Grant Funds" (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Approval Documents:

[Japantown Peace Plaza Pagoda 1610 Geary Blvd - sig_page_complete.pdf](#)

7015.15 certified by Certifying Officer

on:

7015.16 certified by Authorizing Officer

on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
BP-23-CP-CA-0192	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants

Estimated Total HUD Funded, Assisted or Insured Amount: \$3,000,000.00

Estimated Total Project Cost: \$34,277,650.00

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	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		

<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. The Peace Pagoda and Plaza were constructed in 1968, which is before the 1978 federal bans on friable asbestos-containing building materials and lead-containing paints became effective. However, because of the former renovations that the Pagoda structure has already undergone, it is unlikely that the age of the structure signifies that there are asbestos-containing material (ACM) and/or lead-based paint (LBP) present. As per the Air Pollutant Exposure Zone, San Francisco Health Code Article 38 - the site is located in an area with elevated pollutant concentrations. Sensitive use buildings, as defined in the applicability section of the Ordinance, must comply with Health Code Article 38. Compliance with Health Code Article 38 are typically required by the San Francisco Planning Department upon entitlement of the project and activities involving rehab and seismic retrofitting. Dust control for projects is enforced by Department of Building Inspection (DBI) under San Francisco Building Code - San Francisco Administrative Code, Chapter 1A, and Department of Public Works (DPW) under Public Works Code Article 15 and DPW Order No. 171,378. Section 1242 of Article 22B - Construction Dust Control Requirements of the City code stipulate that, "(a) applicants for projects over a half-acre in size shall submit a map showing the location of the project and clearly identifying all surrounding sensitive receptors and particularly noting those within 1,000 feet of the project. The Director of</p>
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		<p>Public Health shall review this map and any other information available to the Director to verify compliance with this submittal requirement. If no sensitive receptors are determined to be within 1,000 feet of the project, then the Director may issue a waiver to the Applicant that specifies that the project is not required to have a site-specific dust control plan. (b) For projects determined by the Director to be within 1,000 feet of sensitive receptors, the Applicant will submit a site-specific dust control plan to the Director for approval. (c) The site-specific dust control plan shall contain all provisions of Section 106.3.2.6.3 of the Building Code and enhanced site-specific dust monitoring and control measures that will apply to the project." Further, in April 2007, San Francisco adopted an Ordinance requiring public projects to reduce emissions at construction sites starting in 2009. Chapter 25 of the San Francisco Environment Code requires that all work performed on a Major Construction Project shall be carried out in compliance with the requirements of this Chapter 25. In March 2015, San Francisco expanded the existing Ordinance to require public projects to further reduce emissions at construction sites in certain areas with high levels of background concentrations of air pollutants. The project will undergo the proper permitting and entitlement requiring compliance with the necessary construction related laws of the City and County of San Francisco.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The</p>

		project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. The project activities encompass previously developed urban property and thus would have no effect on any natural habitats or federally protected species. There are no critical habitats at this location. The project involves renovation activities, no ground disturbing activities and there are no wetlands on site or near the project.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be

		monitored, the project is in compliance with Section 106.
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation. The project activities involve renovation of existing property, including the plaza parking, the plaza area and the pagoda structure. The project will include standardized noise attenuation measures required by the City and County of San Francisco for all construction related projects. The project is in compliance with HUD's Noise regulation.</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. The project is not served by a US EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole source aquifer subject to the HUD EPA MOU.</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. The activities associated with the proposed project would not affect any wetland or riparian areas.</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>No wild and scenic rivers are located within the City and County of San Francisco. This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.</p>
HUD HOUSING ENVIRONMENTAL STANDARDS		

ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete

Project Mitigation Plan

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

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

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[1610 Geary Blvd - Distance to SFO.pdf](#)
[SFO Contour Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Screen Summary

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Are formal compliance steps or mitigation required?

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).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

[1610 Geary Blvd - FEMA FIRMette.pdf](#)

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?

✓ No

Based on the response, the review is in compliance with this section.

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends

that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

Supporting documentation

[1610 Geary Blvd - FEMA Full FIRM.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

✓ No

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. The Peace Pagoda and Plaza were constructed in 1968, which is before the 1978 federal bans on friable asbestos-containing building materials and lead-containing paints became effective. However, because of the former renovations that the Pagoda structure has already undergone, it is unlikely that the age of the structure signifies that there are asbestos-containing material (ACM) and/or lead-based paint (LBP) present. As per the Air Pollutant Exposure Zone, San Francisco Health Code Article 38 - the site is located in an area with elevated pollutant concentrations. Sensitive use buildings, as defined in the applicability section of the Ordinance, must comply with Health Code Article 38. Compliance with Health Code Article 38 are typically required by the San Francisco Planning Department upon entitlement of the project and activities involving rehab and seismic retrofitting. Dust control for projects is enforced by Department of Building Inspection (DBI) under San Francisco

Building Code - San Francisco Administrative Code, Chapter 1A, and Department of Public Works (DPW) under Public Works Code Article 15 and DPW Order No. 171,378. Section 1242 of Article 22B - Construction Dust Control Requirements of the City code stipulate that, "(a) applicants for projects over a half-acre in size shall submit a map showing the location of the project and clearly identifying all surrounding sensitive receptors and particularly noting those within 1,000 feet of the project. The Director of Public Health shall review this map and any other information available to the Director to verify compliance with this submittal requirement. If no sensitive receptors are determined to be within 1,000 feet of the project, then the Director may issue a waiver to the Applicant that specifies that the project is not required to have a site-specific dust control plan. (b) For projects determined by the Director to be within 1,000 feet of sensitive receptors, the Applicant will submit a site-specific dust control plan to the Director for approval. (c) The site-specific dust control plan shall contain all provisions of Section 106.3.2.6.3 of the Building Code and enhanced site-specific dust monitoring and control measures that will apply to the project." Further, in April 2007, San Francisco adopted an Ordinance requiring public projects to reduce emissions at construction sites starting in 2009. Chapter 25 of the San Francisco Environment Code requires that all work performed on a Major Construction Project shall be carried out in compliance with the requirements of this Chapter 25. In March 2015, San Francisco expanded the existing Ordinance to require public projects to further reduce emissions at construction sites in certain areas with high levels of background concentrations of air pollutants. The project will undergo the proper permitting and entitlement requiring compliance with the necessary construction related laws of the City and County of San Francisco.

Supporting documentation

[Public Works Order 171_378.pdf](#)

[Chapter 25_SF Clean Construction RQs.pdf](#)

[ARTICLE 38_SF Enhanced Ventilation for Urban Infill.pdf](#)

[Article 22B_SF Construction Dust Control RQs.pdf](#)

[Dust Control -- Department of Public Health.pdf](#)

[Department of Public Health - Clean Construction.pdf](#)

[AirPollutantExposureZoneMap.pdf](#)

Are formal compliance steps or mitigation required?

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

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[1610 Geary Blvd - Project location in relation to Coastal Zone.pdf](#)

[San Francisco Coastal Zone.pdf](#)

[San Francisco Bay Plan.pdf](#)

[06CZB_SanFrancisco_Coastal Zone Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Japantown-Peace-Plaza-&-
Pagoda---1610-Geary-Bl---
CPF-EDI-23

San Francisco, CA

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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)

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening

None of the Above

2. 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? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

No

Explain:

It is located on top of a partially subterranean two-level parking garage owned by the MTA. The Peace Plaza and Pagoda were constructed in 1968. In 2000-2001, the 37,000-sf Peace Plaza was renovated to address water intrusion issues that was affecting the parking garage below. During this renovation much of the Plaza's original 1968 features were removed. All of the project activities are programmed to occur above ground, including the renovation and seismic retrofitting of the Pagoda which are as follows. The Japantown Peace Plaza Renovation will include: Paving, including special paving areas; increased planting areas; increased seating opportunities; accessible seating opportunities; retained historic-cultural elements; increased lighting; increased usability during events; improved circulation system;

seating terraces; improved Geary Boulevard edge. Seismic Retrofitting Japantown Peace Pagoda will include: To address seismic safety concerns following a structural analysis, a seismic retrofit is proposed for the Peace Pagoda. The seismic reinforcements include:

- A. Four (0.5") steel reinforced tendons/cables that run externally along the long side of each column from the foundation (i.e., garage ceiling) to the roof, installed outside the carbon fiber wrapping.
- B. To reinforce the roof's seismic stability at every level, stainless steel plate reinforcement will be added to the connecting joints between existing adjoining concrete roof panels. Copper standing seam roof (over the existing concrete roof panels) will be removed and replaced to match original material in its entirety.
- C. Increased massing/depth on the horizontal roof ringbeams where they are connected to the columns at each roof level, this includes a new deep circular ring beam at the top roof.
- D. Carbon fiber wrapping around each column, roughly 1" thick. The carbon fiber wrapping would run to the 3rd story roof.
- E. Five Fiber Reinforced Polymer (FRP) strips would run along each column until the 3rd story roof. Three FRP strips would run along the interior side of the column, two would run along the outer edge of each column. The strips would be anchored into the existing podium via three 36" deep pockets. The FRP strips would be located under the carbon fiber wrapping.

Further, a search of GeoTracker returned no open LUST site within 2,000 feet of the project site. The open LUST sites do not pose a risk of harm to the project inhabitants as there is no ground disturbing activity proposed as part of the project. The search of Envirostor returned no active cases within 2,000 feet of the project site. There is no risk of harm with underground disturbing activity associated with this project. The project is not listed on the DTSC Cortese List, nor is near an US EPA superfund site. There are no construction activities involved that would generate any risk of harm to the public and project occupants.

Based on the response, the review is in compliance with this section.

Yes

Screen Summary
Compliance Determination

Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[2023-0320-JPTown Design.pdf](#)
[Superfund National Priorities List \(NPL\) Map.pdf](#)
[HUNTERS POINT NAVAL SHIPYARD Superfund Site Profile US EPA.pdf](#)
[Calif DTSC Cortese List as of 2023-11-22.xlsx](#)
[Att 1-JPP-PagodaArchitecturalRenderings.pdf](#)
[1610 Geary Blvd - Nearest Superfund Site.pdf](#)
[1610 Geary Bl - EnviroStor sites.xlsx](#)
[1610 Geary Bl - Geotracker LUST sites.xlsx](#)
[1610 Geary Blvd - GeoTracker Map.pdf](#)
[1610 Geary Blvd - EnviroStor Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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.

This selection is only appropriate 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: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

Based on the response, the review is in compliance with this section.

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

Yes, the activities involved in the project have the potential to affect species and/or habitats.

Screen Summary

Compliance Determination

This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. The project activities encompass previously developed urban property and thus would

have no effect on any natural habitats or federally protected species. There are no critical habitats at this location. The project involves renovation activities, no ground disturbing activities and there are no wetlands on site or near the project.

Supporting documentation

[IPaC_Explore Location resourc.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

Yes

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.

Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Japantown-Peace-Plaza-&-
Pagoda---1610-Geary-Bl---
CPF-EDI-23

San Francisco, CA

900000010343509

Farmlands Protection

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.)	7 CFR Part 658

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

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. A search on the California Department of Conservation Important Farmland Finder Website appears to categorize the project site as "unique farmland" which is defined as, "Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include nonirrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date." The project location has been paved over and is currently still remains paved. A search on the United States Department of Agriculture, Natural Resources Conservation Services. Web Soil Survey does not indicate any farmland and categorizes the project location as "urban land." The project is in compliance with the Farmland Protection Policy Act. The project site consists of urban land; thus, the project would not affect farmlands.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[CA DLRP Important Farmland Find.pdf](#)

[CA DLRP Important Farmland Category.pdf](#)

[1610 Geary Blvd - Web Soil Survey.pdf](#)

[1610 Geary Blvd - Project Site \(current state\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

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

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

None of the above

2. Upload a FEMA/FIRM map showing the site here:

[1610 Geary Blvd - FEMA FIRMette.pdf](#)

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.

Does your project occur in a floodplain?

No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

Supporting documentation

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)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

- ✓ State Historic Preservation Offer (SHPO) Response Period Elapsed

Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

The renovation and seismic retrofitting of the building, object and structure were determined to not have an adverse effect upon historic resources as determined by the study performed by the project grantee's consultant Architectural Resources Group (ARG) for which the San Francisco Planning Department reviewed the undertaking and found it to be in conformance with the Secretary of the Interior's Standards for Rehabilitation and will therefore not have an adverse effect on a historic property. While ARG found the Pagoda and Peace Plaza not to be eligible for listing, the San Francisco Planning Department disagreed and found that the Peace Plaza and Peace Pagoda were both eligible for listing in the National Register of Historic Places (NRHP) as individual property. This conclusion is based on the Planning Department's determination that the subject building, object and structure are eligible for individual listing under NHRP Criterion A and C associated with events that have made a significant contribution to the broad patterns of our history and embody the distinctive characteristics of a type, period, or method of construction. Accordingly, the Planning Department found that the subject building is eligible for listing in the National Register for local significance under Criterion A (Events) and Criterion C (Design/Construction). In accordance with Stipulations VIII and IX of the 2007 Programmatic Agreement, the consultation process for the resolution of adverse effects of this Undertaking on a historic resource and the potential effects of the Undertaking on archeological resources was initiated with the State Historic Preservation Officer (SHPO). Despite being consulted, the SHPO response period elapsed. The Advisory Council on Historic Preservation (ACHP) was not consulted given the lack of adverse effects on historic resources. American Indian/Native American Tribes were not consulted given the nature of the project scope and activities, in so that is determined that the project would not have any impact on archeological resources. As such, a records search from the Northwest Information Center (NWIC)'s California Historical Resources Information System (CHRIS) was not necessary since the project will not encompass any ground disturbance.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

- 1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

Please refer to attached APE Map.

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
1610 Geary Blvd, San Francisco, CA 94115	Eligible	No	✓ Not Sensitive

Additional Notes:

Please note the City and County assessor's blocks associated with this project: 0700/022, 0700/023

- 2. Was a survey of historic buildings and/or archeological sites done as part of the project?**

✓ Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

No

Step 3 – 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 guidance on direct and indirect effects.

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

No Historic Properties Affected

✓ No Adverse Effect

Based on the response, the review is in compliance with this section.

Document reason for finding:

The San Francisco Planning Department found the Peace Plaza and Pagoda are both individually eligible for listing in the National Register under Criterion A and C. However, the Planning department reviewed the undertaking and found it to be in conformance with the Secretary of the Interior's Standards for Rehabilitation and will therefore not have an adverse effect on a historic property.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

✓ No

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

Supporting documentation

[PA_ca_sanfrancisco_2006.pdf](#)

[Doc 13_MOHCD_JPP_Public_Notification_20230824_FINAL.pdf](#)

[Doc 12_JPP- Public Meetings List 2018-2023.pdf](#)

[Doc 11_2019-000895ENV-CEQA Determination.pdf](#)

[Doc 10_Resume_Rusch_ARG_Japantown106_09192023.pdf](#)

[Doc 9_SF Plannig_FormB_ARG DPR 523 A-L.pdf](#)

[Doc 8_Form A Submission to SF Planning Department.pdf](#)

[Doc 6_DraftLandmarkDesignationReport_4-13-15.pdf](#)

[Doc 5_JPP DraftLandmark Recommendation Reso.pdf](#)

[Doc 3_JPP-PagodaArchitecturalRenderings.pdf](#)

[Doc 2_Japantown APE Map MEMO ARG_07112023.pdf](#)

[Doc 1_Japantown APE Map ARG_06152023.pdf](#)

[Japantown Peace Plaza Pagoda SHPO Consult Letter FINAL 20231010-signed.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

✓ None of the above

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation. The project activities involve renovation of existing property, including the plaza parking, the plaza area and the pagoda structure. The project will include standardized noise attenuation measures required by the City and County of San Francisco for all construction related projects. The project is in compliance with HUD's Noise regulation.

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Supporting documentation

[SF Planning - Noise Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

✓ Yes

Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. The project is not served by a US EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole source aquifer subject to the HUD EPA MOU.

Supporting documentation

[San Francisco - Sole Source Aquifers.pdf](#)

[MOU HUD EPA Region 9.pdf](#)

[1610 Geary Blvd - Sole Source.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages 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.

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.

Yes

Screen Summary

Compliance Determination

Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. The activities associated with the proposed project would not affect any wetland or riparian areas.

Supporting documentation

[1610 Geary Blvd - Wetlands Mapper.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
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 (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

No wild and scenic rivers are located within the City and County of San Francisco. This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[San Francisco Wild and Scenic Rivers.pdf](#)
[National Wild and Scenic Rivers System Map.pdf](#)
[CA National Wild and Scenic River System Rivers.pdf](#)
[1610 Geary Blvd - Ntl Wild and Scenic Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

General requirements	Legislation	Regulation
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	

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

✓ No

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

[NEPAAssistReport.pdf](#)

[nepa_promising_practices_document_2016.pdf](#)

[ExhibitH_23_03_02_EJC_Map_User_Guide.pdf](#)

[ExhibitG_23_03_10_EJC_Map_Technical_Documentation_Transmittal_w_app.pdf](#)

[Environmental_Justice_Communities-Map.pdf](#)

[EJScreen_Community_Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

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✓ No