



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

Armando Quintero, Director

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October 30, 2020

[VIA EMAIL]

Refer to HUD\_2020\_1029\_001

Ms. Janice L. Waddell  
Federal Programs Branch Chief  
Department of Housing and Community Development  
2020 West El Camino Avenue, Suite 670 95833  
P.O. Box 952054  
Sacramento, CA 94252- 2054

Re: California Department of Housing and Community Development HUD Funded Housing  
Rehabilitation Program

Dear Ms. Waddell:

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 the SHPO that the California Department of Housing and Community Development (HCD) administers a residential rehabilitation program assisted by funding from the U.S. Department of Housing and Urban Development (HUD). We recommend that the HCD 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, we recommend that HCD 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

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lobbies or corridors. HCD does not need to consult with the SHPO for projects involving rehabilitation of mobile homes or trailers.

We request that HCD consult with the SHPO if a rehabilitation project involves substantial earth moving, such as footing/foundation trenching, utility line excavation (sewer, water, gas, leach, etc.), 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 new construction, HCD needs to consult on a case-by-case basis pursuant to 36 CFR Part 800.

If HCD agrees to the suggested process, sign the concurrence block at the bottom of this letter and return a copy to the SHPO.

Please do not hesitate to contact Shannon Lauchner Pries, State Historian II, with the Local Government & Environmental Compliance Unit at (916)445-7013, or by email at [shannon.pries@parks.ca.gov](mailto:shannon.pries@parks.ca.gov) with any questions or comments.

Sincerely,



Julianne Polanco  
State Historic Preservation Officer

Enclosures

I concur with the Section 106 compliance process outlined above.

California Department of Housing and Community Development



Digitally signed by Janice Waddell  
Date: 2020.11.05 15:02:05 -08'00'

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(signature)

Janice L. Waddell, Federal Programs Branch Chief

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