

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF FINANCIAL ASSISTANCE**

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November 9, 2020

Mr. Bret Banks
Executive Director/Air Pollution Control Officer
Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535
Transmitted via email: bbanks@avaqmd.ca.gov

Re: Tiered Environmental Review of Single-Family Home Projects in Los Angeles
County
2018 Community Development Block Grant Disaster Recovery

Dear Mr. Banks:

In 2018, the Camp, Carr, Mendocino Complex Fire, and Woolsey Fires erupted in California and resulted in two presidential major disaster declarations, DR-4382 for Shasta and Lake Counties; and DR-4407 for Butte, Los Angeles, and Ventura Counties. Following the federally declared disasters, the State of California's Department of Housing and Community Development (HCD) is serving as the lead and responsible agency for administering the Community Development Block Grant – Disaster Recovery (CDBG-DR) from the U.S. Department of Housing and Urban Development to support long-term recovery efforts. The 2018 CDBG-DR program will provide grants to owner-occupied homeowners to rehabilitate or reconstruct homes damaged or destroyed by the devastating wildfires in 2018. Under the CDBG-DR funding umbrella, HCD has established an Owner-Occupied Rehabilitation and Reconstruction Program (the "Program") to support long-term recovery efforts and address unmet housing needs in areas impacted by the 2018 disasters. The program is designed to ensure that the housing needs of very-low, low- and moderate-income households and vulnerable populations are addressed to the greatest extent feasible.

The Program will allow affected residents to apply directly to the State for gap financing grants to repair or reconstruct their single-family homes. Projects under the program are expected to involve repair/rehabilitation or reconstruction of single-family dwellings, such as stick built, modular, or manufactured housing units. Reconstruction has been defined by the Program as the rebuilding of a structure on the same site in substantially the same footprint and manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

In accordance with 24 CFR Part 58, HCD is facilitating the federally-required environmental reviews for the Program in Los Angeles County and four other California counties.

As specified in the State of California, August 2020 *Action Plan for Disaster Recovery*, the best currently available data suggests that approximately 1,300 homeowners may seek funding through this program. Individual project sites will be reviewed as part of Tier 2 once those sites are identified.

To expedite environmental review while complying with 24 CFR Part 58 and other applicable laws and regulations, HCD seeks to provide the Antelope Valley Air Quality Management District (AQMD) with notice of the program for the following types of single-family housing unit projects:

1. Repairs to disaster-damaged primary structures;
2. Reconstruction of the disaster-damaged primary structure;
3. Upgrades required to meet current building code (including the 2019 Building Energy Efficiency Standards, where applicable);
4. Replacement of fire damaged or destroyed necessary equipment, such as HVAC units or septic systems;
5. Handicap accessibility features;
6. Repair and replacement of manufactured housing units;
7. Site work to meet California Wildland Urban Interface standards for homes in high risk areas;
8. Addition of handicap accessibility features (if applicable); and,
9. Lead-based paint and asbestos abatement (if applicable).

HCD anticipates that the actions of the program will conform to the State Implementation Plan because they are not anticipated to:

1. Cause or contribute to a new violation of any existing standard;
2. Increase the frequency or severity of any existing violation of any standard; or
3. Delay timely attainment of any standard.

HCD intends to comply with any local regulations, including those applying to lead-based paint and asbestos abatement activities. HCD will employ mitigation measures, such as dust suppression, covering haul loads, vehicle idling reduction, and spill mitigation measures, as best management practices.

HCD is dedicated to providing disaster assistance to people in need of single-family housing as a result of the 2018 disasters as soon as possible. HCD is requesting a response letter addressing the project work within your jurisdiction in Los Angeles County to document completion of coordination with the Antelope Valley AQMD and compliance with Federal and State air quality standards. Due to the urgency of this matter, we ask that you please respond no later than 30 days from receipt of this letter to Doug Ganey at (doug.ganey@hagertyconsulting.com).

Thank you in advance for your assistance. If you have any questions or would like additional information please contact Doug Ganey at (916) 947-1000.

Sincerely,



Digitally signed by
Janice Waddell
Date: 2020.11.09
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Janice L. Waddell
Branch Chief, Federal Programs