



CEQA INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

**Tier I Environmental Review
State of California 2018 Community Development Block Grant –
Disaster Recovery, Owner-Occupied Housing Rehabilitation and
Reconstruction Grant Program, Butte County**

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California Environmental Quality Act Initial Study/Mitigated Negative Declaration

Tier I Environmental Review State of California

2018 Community Development Block Grant – Disaster Recovery, Owner-Occupied Housing Rehabilitation and Reconstruction Grant Program, Butte County

1.0 Introduction

The State of California Department of Housing and Community Development (HCD) is the lead and responsible agency for administering 2018 Community Development Block Grant – Disaster Relief (CDBG-DR) funds allocated to the State of California by the U.S. Department of Housing and Urban Development (HUD), which includes grant funding for owner-occupied homeowners to rehabilitate or reconstruct homes damaged or destroyed in the 2018 wildfire disaster. The Owner-Occupied Housing Rehabilitation and Reconstruction Program (“OOR” or “Program”) objective is to provide decent, safe, and sanitary housing in the areas affected by the disaster. The program is designed to ensure that the housing needs of very-low, low- and moderate-income (LMI) households and vulnerable populations, including individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible.

As part of the environmental review process for the 2018 OOR Program, this Initial Study/Mitigated Negative Declaration (IS/MND) was conducted in accordance with the California Environmental Quality Act (CEQA). The objective of this IS/MND was to determine if there are environmental impacts associated with the 2018 OOR Program specific to Butte County. Program work in other counties of the 2018 OOR Program has been determined to be exempt from CEQA review and a separate Notice of Exemption has been prepared for the remainder of the Program.

In accordance with Section 15022 of the CEQA Statute each public agency shall adopt objectives, criteria, and specific procedures consistent with CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. HCD does not have its own CEQA procedures and has instead adopted the State CEQA Guidelines through incorporation by reference.

1.1 Adoption of NEPA Environmental Assessment

In accordance with CEQA Statute and Guidelines Sections 15006(j) and 15063 (a)(2) this CEQA Initial Study was prepared in a manner to eliminate duplication with federal procedures by adopting the previously completed Environmental Assessment (EA) prepared under the federal National Environmental Policy Act (NEPA). The NEPA EA is

provided as Attachment 1 and HCD adopts all relevant portions of that EA to satisfy its environmental review requirements under CEQA.

In addition to adoption of the NEPA EA (Attachment 1) as the CEQA Initial Study, this document also contains additional, supplemental information not contained in the NEPA EA and as provided below.

1.2 Purpose and Regulatory Guidelines

The purpose of the Initial Study is to provide a preliminary analysis of the proposed project to determine whether a Negative Declaration (ND), Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR) should be prepared. The Initial Study enables the Lead Agency (HCD) to modify the project, mitigating adverse impacts in lieu of preparing an EIR, thereby potentially enabling the project to qualify for a Negative Declaration. As described herein an MND is appropriate for the 2018 OOR Program in Butte County. This MND has been prepared in accordance with CEQA, Public Resources Code § 21000 et seq., and State CEQA Guidelines, 14 California Code of Regulations (CCR) § 15000 et seq.

1.3 Project Description and Location

A full description of the 2018 OOR Program in Butte County is provided in the EA document (Attachment 1). The proposed project under this Broad-Level Tiered Environmental Review will be limited to Butte County, California (Attachment 1, Figure 1). Butte County is in Northern California, at the northeastern end of the Sacramento Valley, and extending east into the northern Sierra Nevada Mountain foothills. Butte County is predominantly a rural area; with urban land makes up less than 5% of the county area. The weather in Butte County is generally temperate and warm, with average lows dropping to just below 40 degrees Fahrenheit and summer highs ranging over 90 degrees Fahrenheit (Butte County, 2014).

The November 2018 Camp Fire in Butte County has become California's deadliest and most destructive wildfire on record and destroyed approximately 19,000 structures, including 14,000 homes. Tragically, 85 lives were lost. Nearly the entire Town of Paradise was destroyed in this fire, which moved quickly and was fueled by high winds. Due to the destruction, Butte County was included in the presidentially declared disaster, DR-4407, and was also identified as a Most Impacted and Distressed Area. As a result of DR-4407, the federal government appropriated Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to support the unmet recovery needs. HCD is the lead and responsible agency for administering the CDBG-DR funds allocated to the State of California.

The California HCD will provide grants to LMI homeowners whose primary residence was damaged or destroyed in 2018 by disasters that occurred in the California counties identified in the following Table 1.

Table 1. 2018 Federally Declared Disaster Areas

Federally Declared Disaster DR-4382

1. Lake County
2. Shasta County

Federally Declared Disaster DR-4407

1. Butte County
2. Los Angeles County
3. Ventura County

The Project activities in Lake, Los Angeles, Shasta, and Ventura Counties have been determined to be exempt from CEQA and a separate Notice of Exemption has been prepared for related disaster-recovery work in those counties. All Program work within the affected counties will be performed in accordance with existing zoning, plans, and other applicable land use controls.

2.0 Environmental Effects Analysis

This Initial Study incorporates the NEPA EA provided as Attachment 1 and provides an inventory of environmental conditions within Butte County and analysis of the potential effects of the 2018 OOR Program on specified environmental impact categories, including the following categories specified in the HUD NEPA process:

- Airport Hazards;
- Coastal Barrier Resources;
- Flood Insurance and Floodplain Management;
- Clean Air;
- Coastal Zone Management;
- Contamination and Toxic Substances;
- Endangered Species, Wildlife and Vegetation;
- Explosive and Flammable Hazards;
- Farmland Protection;
- Historic Preservation;
- Noise Abatement and Control;
- Sole Source Aquifers;
- Wetlands Protection;
- Wild and Scenic Rivers;
- Environmental Justice;
- Land Development/Use;
- Soil Suitability/Erosion;
- Stormwater Runoff;
- Energy Consumption;
- Socioeconomic Factors;
- Community Facilities and Services;

The Initial Study fully addresses the environment, as described by CEQA, as “the physical conditions which existing within the area which will be affected by a proposed Project including land, air, water, flora, fauna, noise, objects of historic or aesthetic significance.” A detailed analysis of environmental impacts is presented for each resource area utilizing the model Environmental Checklist Form found in Appendix G of the CEQA Guidelines Section 15063(f). Impacts to the environment for construction and operation of the Project are assessed and described, and the level of significance of impacts is measured against criteria that have been established by regulation,

accepted standards, or other definable criteria. The use of an MND is only permissible if all potentially significant environmental impacts assessed in the Initial Study are rendered less than significant with incorporation of mitigation measures.

The environmental impact categories in Appendix G of the CEQA Guidelines are largely the same as the impact categories listed above and analyzed in the EA. A copy of the Appendix G checklist is provided as Attachment 2 for comparison purposes.

Environmental impact categories in CEQA Appendix G that were not included in the NEPA EA review include the following:

- Aesthetics;
- Geology and Mineral Resources;
- Forestry Resources;
- Greenhouse Gas Emissions;
- Wildfire; and,
- Mandatory Findings of Significance.

Following the Appendix G checklist for an Initial Study is a guideline and is not strictly required. Still, an analysis of these additional impact categories was performed for the Initial Study as summarized below.

2.1 Aesthetics

Butte County is located in northern California, at the northern end of the California Central Valley. The eastern portion of the county lies along the western slope of the Sierra Nevada mountain range. Butte County is drained by the Feather River and Butte Creek, tributaries to the Sacramento River. The County is rich in scenic resources, which include portions of Lassen and Plumas National Forests, and the Butte Sink and Sacramento River National Wildlife Refuges. Other scenic areas include Butte Creek Canyon and the Feather Falls Scenic Area.

The proposed 2018 OOR Program would consist of the rehabilitation and reconstruction of existing single family homes and would not affect any of these scenic county features. The Program would improve aesthetics in the burned areas, which continue to display the negative impacts of the disaster. During short-term construction activities, views within the county may be temporarily altered by the placement of construction equipment, and signage; however, construction impacts would be temporary with no permanent impacts.

Initial Study Checklist Items – Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

The 2018 OOR Program would have no impact on a scenic vista. The Program

consists of the rehabilitation and reconstruction of existing single-family homes, and views in the burned areas would improve as a result of the proposed Program.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The 2018 OOR Program would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The only identified state scenic highway within Butte County is State Route 149 starting near Wicks Corner and continuing east into Plumas County. There would be no impact from the Program on this state scenic highways. Any homes to be rebuilt along Route 149 would be reconstructed in the same manner as pre-disaster.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The 2018 OOR Program would not substantially degrade the existing visual character or quality of the site and its surroundings but rather would improve them. There would be no impact on the existing visual character.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The 2018 OOR Program would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Lighted homes will be constructed in areas where they already existed. There would be a less than significant impact with respect to sources of light or glare.

2.2 Geology and Mineral Resources

Butte County is located within the Sacramento Valley, the northern arm of the Central Valley of California, also known as the California Trough Physiographic Province. The topography of Butte County varies considerably from the very flat Central Valley that includes the City of Chico, to the Sierra Nevada foothills that include the Town of Paradise and the Table Mountain basaltic mesas north of the City of Oroville. The geology in Butte County varies considerably. The Central Valley portion of the County is underlain by a deep paleo-valley made up of mostly of unconsolidated Quaternary age (2.6 million years ago [mya] to present) alluvial and marine sedimentary deposits (California Division of Mines and Geology, 1992). The upland portions of the County are made up of igneous rocks of Miocene and Pliocene age (23 to 2.6 mya) and older Cretaceous and Jurassic age (201 to 66 mya) rocks consisting of marine turbidites, with interbedded marine sandstone, siltstone, and conglomerates (California Department of Water Resources, 2014).

Mapping of the California Geological Survey (CGS)'s Probabilistic Seismic Hazard Assessment Program shows the relative intensity of ground shaking in California from anticipated future earthquakes. The shaking potential is calculated as the level of ground motion that has a 2% chance of being exceeded in 50 years, which is the same as the level of ground-shaking with about a 2,500-year average repeat time. Although the greatest hazard is in areas of highest intensity as shown on the map, no region in California is immune from potential earthquake damage.

Current mineral resources within Butte County consist primarily of sand and gravel aggregate. Butte County has been historically mined for gold, silver, platinum, marble, asbestos, and other stone and gems. The proposed 2018 OOR Program and reconstruction of disaster-damaged houses would not affect mineral resources.

Initial Study Checklist Items – Geology and Mineral Resources

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving?

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42

California Geological Survey Special Publication 42 and online mapping information indicate there is one mapped Alquist-Priolo Earthquake Fault Zone in Butte County – the Cleveland Hills Fault near the community of Bangor in the southern part of the county. There are a number of other faults within Butte County and a large number of relatively nearby faults that could be considered potentially active, according to the California Mining and Geology Board criteria. The general nature of the rehabilitated and reconstructed homes would not change and the risks from earthquake faults would remain as present. Houses would be constructed in accordance with State and local building codes. The impact from known earthquake faults on the 2018 OOR Program in Butte County would be less than significant.

ii) Strong seismic ground shaking?

According to the CGS Probabilistic Seismic Hazard Map, Butte County is located in a region that is distant from known, active faults and will experience lower levels of shaking less frequently. In most earthquakes, only weaker, masonry buildings would be damaged. However, very infrequent earthquakes could still cause strong shaking in Butte County. Houses would be constructed in accordance with State and local building codes. The impact from known earthquake faults on the 2018 OOR Program in Butte County would be less than significant with mitigation.

iii) Seismic-related ground failure, including liquefaction?

Liquefaction is a seismic hazard that occurs when ground shaking causes soils with high water content and fill material that are not well consolidated or compacted to lose cohesion under the stress of an earthquake resulting in the soils transforming from a solid to liquid state. Typically, depth to groundwater of 40 feet or less is required, and young sediments and artificial fill material at or below the groundwater table are especially vulnerable. The Program houses would be reconstructed on the same sites and the risks from liquefaction would remain as present.

For properties where houses are to be constructed outside of the original footprint, additional soil suitability analysis, potentially including a geotechnical study, will be required. Design and construction approval is to be coordinated with the local building and/or planning department. Program houses would be constructed in accordance with current seismic standards including consideration of soil type and liquefaction susceptibility. There would be a less than significant impact from liquefaction on the 2018 OOR Program.

iv) Landslides?

Landslides refer to a wide variety of processes that result in the downward movement of soil and rock material under gravitational influence. Common types of landslides include slump, rockslide, debris flow, lateral spreading, debris avalanche, earth flow, and soil creep. Program houses would be constructed in accordance with current building and zoning ordinances and include consideration of landslide susceptibility. There would be a less than significant impact from liquefaction on the 2018 OOR Program.

v) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are paleontological resources and unique geologic features in Butte County. Jurassic age plant and invertebrate fossils have been found along the Feather River. Mosasaurus fossils that have been recovered from the Chico formation, from the Late Cretaceous period. Unique geologic features including lahars (volcanic mud flows) in Chico and Bald Rock Dome, a granitic batholith in the Plumas National Forest. Despite the presence of these features, there would be no impact to unique paleontological resources or geologic features from the 2018 OOR Program. The Program houses would be constructed on previously developed lots with minimal excavation and would not require any rock blasting or excavation that could damage geologic or paleontologic features.

b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The Program would consist of the reconstruction of previous homes on their original lots

and would have not result in the loss of availability of a known mineral resource.

c) Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The 2018 OOR Program would consist of rehabilitation and reconstruction of homes on existing, previously disturbed lots and would not result in any loss of availability of a known mineral resource or a locally-important mineral resource recovery site.

2.3 Forestry Resources

Butte County contains forested areas including portions of two National Forests primarily in the eastern portion of the county. The combination of ample rainfall, a long growing season and deep soils result in good growing conditions for mixed conifer forest in Butte County. The prime locations are found in the northeastern portions of the County at elevations between about 2,200 and 6,200 feet. These sites support sugar pine (*Pinus lambertiana*), ponderosa pine (*Pinus ponderosa*), Douglas fir (*Pseudotsuga menziesii*), white fir (*Abies concolor*), and incense cedar (*Calocedrus decurrens*). About 66 million board feet of timber is produced in Butte County annually. Timber harvests on private lands are primarily regulated by the California Department of Forestry and Fire Protection (CalFire) through the timber harvest plan review process (Butte County, 2013).

Initial Study Checklist Items – Forestry Resources

Would the project:

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The 2018 OOR Program would not conflict with existing zoning or cause rezoning of forest land or timberland. Houses would be rehabilitated and reconstructed on their existing lots that are zoned for residential use.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

The 2018 OOR Program would not result in the loss of forest land or conversion of forest land to non-forest use. Houses would be reconstructed on previously developed sites. There would be no impact with respect to loss of forest land.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

The 2018 OOR Program would not result in changes in the environment that could result in the conversion of forest land to non-forest use. Houses would be reconstructed on previously developed sites. There would be no impact with respect to loss of forest land.

2.4 Greenhouse Gas Emissions

The greenhouse effect is responsible for maintaining a habitable climate on Earth. The greenhouse effect is a collection of atmospheric gases called greenhouse gases (GHGs) that insulate the Earth and help regulate its temperature. These gases allow solar radiation into the Earth's atmosphere, but act as insulation preventing radiative heat from escaping and warming the Earth's atmosphere. GHGs influence the amount of heat trapped in the Earth's atmosphere and play a critical role in determining the earth's surface temperature.

Since the Industrial Revolution starting around 1750, human activities including fossil fuel combustion, industrial processes, deforestation, landfills, and development have contributed GHGs to the atmosphere. GHG emissions caused by humans (i.e., anthropogenic) intensify the greenhouse effect leading to an unnatural warming trend of the Earth's climate, known as global climate change or global warming. There is strong scientific consensus that it is "extremely likely" that most of the changes in the world's climate during the last 50 years are the result of anthropogenic GHG emissions. This has led to a warming trend of the earth's atmosphere and oceans, with corresponding effects on global circulation patterns and climate (Intergovernmental Panel on Climate Change [IPCC], 2014).

All levels of government have some responsibility for the protection of air quality, and each level (federal, state, and regional/local) has specific responsibilities relating to air quality regulation. GHG emissions and the regulation of GHGs is a relatively new and complex component of this air quality regulatory framework. On the California state regulatory level, Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 requires statewide GHG emissions be reduced to 1990 levels by 2020 (Health & Safety Code §38550). AB 32 requires the ARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG reductions. The ARB's adoption of the AB 32 GHG limits is established in Health & Safety Code § 38550.

Further, in 2008, the ARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan) in accordance with Health & Safety Code section 38561. The Scoping Plan established an overall framework for measures that will be adopted to reduce California's GHG emissions in accordance with AB 32. A draft Second Update was released in 2017 and included achieving the following milestones by 2030: a 50 percent Renewable Portfolio Standard; a more stringent Low Carbon Fuel Standard; deploying additional near-zero and zero emissions technologies in the transportation sectors; increasing the stringency of the Senate Bill (SB) 375 reduction targets for 2035; a 20 percent reduction in GHG emissions from the refinery sector; and, continued deployment of a declining emissions cap under the Cap-and-Trade Program.

Butte County Air Quality Management District has not yet adopted plan-level GHG reduction guidance for County jurisdictions. A GHG inventory has been conducted as part of the Butte County Climate Action Plan (2014). The Climate Action Plan used the existing inventory to set reduction targets and identify appropriate strategies. The Climate Action Plan builds on existing efforts of County departments, businesses, and community groups to reduce greenhouse gas emissions and identify future efforts needed to be consistent with statewide targets identified in AB 32.

An analysis was conducted of a typical home reconstruction development on a quarter-acre site under the Program. Reconstruction would commence with demolition of any remaining existing structures and removal of debris from the site. The construction duration for the typical house rebuild, including building construction, paving, and architectural coatings was estimated as 40 days. Building construction timeframe is expected to be short compared to typical house construction because HCD will be gaining efficiency by building many houses simultaneously under the Program. For the purpose of this analysis, it was assumed that project construction would commence in May 2021. Construction GHG emissions include emissions from heavy construction equipment, truck traffic, and worker trips. Emissions from construction of the project were estimated through the use of the California Emissions Estimator Model (CalEEMod) (CAPCOA, 2016) Version 2016.3.2 for proposed construction. CalEEMod contains emission factors from the Air Resources Board’s OFFROAD model for heavy construction equipment and EMFAC2014 model for on-road vehicles. Table 1 presents the construction-related emissions from a representative house reconstruction under the Program.

Table 1. Estimated Construction Greenhouse Gas Emissions, Representative House Reconstruction

Emission Source	Emissions (metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
All Phases Construction	0.17	0.007	0.0000	24

The model results indicate a typical house reconstruction would result in 24 metric tons of carbon dioxide equivalent (a summation of the emissions from various greenhouse gases based on their global-warming potential). Although the cumulative GHG emissions from the Program would be approximately 1,000 times that of a single house this would represent a small percentage of GHG emissions for cumulative rebuilding projects and other disaster recovery efforts (e.g. hazard tree removal program) in the county. Mitigation to offset Program GHG emissions will consist of following the Butte County Climate Action Plan and State and local renewable energy requirements in the reconstruction process.

Initial Study Checklist Items – Greenhouse Gas Emissions

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG emissions from the 2018 OOR Program will be produced from the materials and construction equipment used in the reconstruction of houses, but these emissions would be short-term and minor. GHG emissions during normal operations of the reconstructed houses would be the same as pre-disaster and a corresponding reduction in GHG emissions would occur at the temporary homes being utilized by the homeowners. While the project construction would have an incremental contribution within the context of the region, the individual impact is temporary and considered less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction would be performed in accordance with the County Climate Action Plan and State and local renewable energy requirements. There would be no impact from conflict with plans, policies, and regulations.

2.5 Wildfire

Fire Hazard Severity Zones are geographical areas designated pursuant to California Public Resources Codes Sections 4201 through 4204 and classified as Very High, High, or Moderate in State Responsibility Areas or as Local Agency Very High Fire Hazard Severity Zones designated pursuant to California Government Code Sections 51175 through 51189. Nearly half of Butte County on its northeast side is classified as a very high fire hazard severity zone according to Cal Fire classification. The county has been severely damaged by wildfire over the past several years. Climate change is expected to increase the risk of wildfire and alter the distribution and character of natural vegetation in California. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is also twice the increase expected if temperatures stay in the lower warming range.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The proposed home reconstruction Program would not substantially impair an adopted emergency response plan or emergency evacuation plan. Homes would be reconstructed on their original lots and subject to the same (or updated) emergency evacuation plans from prior to the disaster.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or

the uncontrolled spread of a wildfire?

The proposed home reconstruction Program would not exacerbate wildfire risks and thereby expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire. Wildfire risks would remain similar to the original conditions although disaster mitigation projects are being implemented throughout the county to reduce wildfire risks.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No new infrastructure will be installed as part of the 2018 OOR Program although repairs to damaged infrastructure are being conducted concurrently in Butte County.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The proposed home reconstruction Program would not expose people or structures to significant risks including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These risks would remain similar to the original conditions although disaster mitigation projects are being implemented throughout the county to reduce post-fire risks.

2.6 Mandatory Findings of Significance

The 2018 OOR Program would not result in any mandatory findings of significant as specified in the CEQA Environmental Checklist Form ("Appendix G"):

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The 2018 OOR Program would consist of the rehabilitation and reconstruction of houses damaged during the 2018 wildfires in Butte County and there would be no impact to the biological, ecological, and cultural resources described in this category.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Consideration of cumulative impacts was provided in the NEPA EA (Attachment 1). The multiple, simultaneous disaster recovery and rebuilding efforts located within a small geographic area of Butte County and specifically the Town of Paradise have the potential to result in cumulative environmental impacts with respect to environmental impact categories including air quality, water quality, noise, and biological resources. The use of mitigation measures described in the NEPA EA and this document would reduce the contribution of the 2018 OOR Program to cumulative impact levels that are less than significant. The parallel disaster recovery efforts would be relatively short term and temporary.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The 2018 OOR Program would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. The 2018 OOR Program would provide a benefit to the local community.

3.0 Mitigation Measures

The NEPA EA (Attachment 1) lists mitigation measures adopted by HCD to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the applicable environmental regulations. 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. The approach to implementing the mitigation measures will be described in Tier 2 environmental review documents to be prepared by the 2018 OOR Program's Construction Manager and approved by HCD.

This Initial Study has determined that in the absence of mitigation the proposed project could have the potential to result in significant impacts associated with the factors described in the NEPA EA (Attachment 1). In addition to the findings of the NEPA EA, additional mitigation measures identified during the CEQ review include those for geology and GHG emissions described below.

Geology

Seismic hazards are not specifically addressed in the HUD NEPA EA process but were examined in this Initial Study. Mitigation for potential impacts from seismic shaking would consist of reconstructing homes in accordance with state building code and local ordinances. These measures would reduce all potentially significant impacts to less-than-significant levels.

GHG Emissions

GHG emissions are not specifically addressed in the HUD NEPA EA process but were examined in this Initial Study. Mitigation for potential impacts from GHG emissions

would consist of reconstructing homes accordance with the County Climate Action Plan and State and local renewable energy requirements.

These building design requirements and the mitigation measures described in the NEPA EA would reduce all potentially significant impacts to less-than-significant levels.

4.0 Mitigated Negative Declaration

Consistent with the State CEQA Guidelines, the California HCD has reviewed the information regarding the proposed 2018 OOR Program and determined that it is appropriate to prepare an Initial Study and MND, consisting of the adoption of the NEPA EA prepared for the Program and the supplemental review contained in this document. This Broad-Level Tier 1 environmental review will be limited to the Program's implementation in Butte County, California. Additional site-specific environmental review will be performed as Tier 2 and ultimately combined in the Program's environmental review record.

Based on the Tier 1 review, the Program would result in less than significant impacts with mitigation measures incorporated into the Program. The project would result in less than significant impacts with mitigation measures incorporated into the project.

In the event that potential significant environmental impacts are identified during the site-specific Tier 2 environmental review process, and those impacts cannot be reduced to below the significance thresholds through use of the specified mitigation measures, then the CEQA (and NEPA) environmental review process would be re-opened and expanded for those specific sites only. An environmental impact report under CEQA could be required in such cases.

5.0 Preparers

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Attachment 1: NEPA Environmental Assessment

Attachment 2: CEQA Appendix G Checklist
