

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

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November 9, 2020

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816
Transmitted via email: julianne.polanco@parks.ca.gov

Re: Tiered Environmental Review of Single-Family Home Projects in Butte, Lake, Los Angeles, Shasta, and Ventura Counties, California
2018 Community Development Block Grant Disaster Recovery

Dear Ms. Polanco:

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. 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, except in Butte County. Due to widespread devastation from the 2018 Camp Fire in the Town of Paradise, Butte County, some homes in Paradise may have to be rebuilt on different portions of the same property (i.e. outside of the original footprint) to accommodate the complex Town-wide rebuilding process. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

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.

In accordance with 24 CFR Part 58 and in an effort to comply with Section 106 consultation requirements, HCD is facilitating the federally-required reviews for the Program in Butte, Lake, Los Angeles, Shasta, and Ventura Counties.

The proposed projects will be occurring in the five counties mentioned above and will consist of 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 intends to comply with Section 106 consultation procedures outlined and attached to your October 30, 2020 letter to HCD, following consultation on the 2017 Program. In compliance with the procedures outlined in this letter, HCD will implement the following Tier 2 procedures:

1. HCD does not need to contact the SHPO for consultation under Section 106 for the following circumstances:
 - a) If work at a subject property is limited to the interior only, and not visible from the exterior; or,
 - b) If a subject property will undergo exterior work but is younger than 45 years old.
2. HCD will request consultation under Section 106 from the SHPO if any of the following circumstances are encountered:
 - a) A subject property will undergo exterior work and is older than 45 years old;
 - b) A rehabilitation project involves substantial earth moving, such as footing/foundation trenching, utility line excavation, septic tank excavation, or if the possibility exists that such earth disturbance may or will occur on or near an archeological site; or,
 - c) If any activities would be considered new construction, HCD will consult with SHPO on a case by case basis.

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. If the SHPO would like additional information on the 2018 Program, or would like to provide additional guidance to HCD for the 2018 Program, we ask that you please respond electronically to Doug Ganey at (doug.ganey@hagertyconsulting.com) no later than 30 days from receipt of this letter.

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

Sincerely,



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Waddell
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Janice L. Waddell
Branch Chief, Federal Programs