



California Department of Housing and Community Development

Community Development Block Grant-Disaster Recovery

2020/2021 Action Plan Amendment 3

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STATE OF CALIFORNIA 2020 CDBG-DR ACTION PLAN
 AMENDMENT 3
 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

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1. Executive Summary

1.1 Overview

The purpose of Amendment 2 of the Action Plan for 2020 disasters is to include and incorporate the Action Plan for 2021 disasters.

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2020 Disasters

The U.S. Department of Housing and Urban Development (HUD) announced that the State of California will receive \$231,203, 000 in funding to support long-term recovery efforts following FEMA DR-4558 and DR-4569 through the California Department of Housing and Community Development (HCD). Community Development Block Grant- Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet needs in California.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$231,203,000 in CDBG-DR funds to the State of California in response to FEMA DR-4558 and DR-4569, through the publication of the Federal Register, Vol. 87, No. 23, February 3, 2022 (87 FR 6364). This allocation was made available through Public Law 117-43, the Extending Government Funding and Delivering Emergency Assistance Act, September 30, 2021.

2021 Disasters

Additionally, under the authority of Public Law 117-43, HUD announced on May 24, 2022, through Federal Register publication [87 FR 31636](#), California would be receiving \$14,761,000 in CDBG-DR funding for the 2021 disaster, FEMA DR-4610. Then, subsequently, on November 30, 2022, HUD announced through a press release: [HUD Announces \\$1.447 Billion for 2021 Disaster Recovery and Mitigation | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#), that California would be receiving an additional \$9,647,000 in CDBG-DR funding for DR-4610, for a total allocation of \$24,408,000. This additional funding is officially authorized through the January 18, 2023, Federal Register publication [88 FR 3198](#)

HCD is the lead and responsible agency for administering the CDBG-DR funds allocated to the State of California. HCD strives to ensure that every Californian has a safe, stable, and affordable home. However, California is in a housing crisis a half century in the making. After decades of underproduction, housing supply is far behind need leading to soaring housing prices and rents. Disaster exacerbates California's already unaffordable housing price, and both disasters and the state's ongoing housing crisis disproportionately impacts and highlights the historical disadvantages of Black, Indigenous and People of Color, vulnerable populations, and federally protected classes.

This Action Plan describes HCD's analysis of the collective local and statewide impact of the 2020 disasters DR-4558 and DR-4569 and the 2021 disaster DR-4610, the unmet needs resulting from these disasters and the state's plan for allocating funding to recovery projects and programs in the areas most impacted and distressed by the disasters. HCD commits to directing at least 70 percent, \$161,842,100, of the total 2020 grant allocation, \$231,203,000, and \$17,085,600 for the total 2021 grant allocation, \$24,408,000, to benefit low and moderate income (LMI) individuals or areas in accordance with Section 103 of the Housing and Community Development Act. HCD also commits to directing no less than 80 percent, \$184,962,400, of the total 2020 allocation, and 100 percent of the total 2021 allocation, to

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benefit HUD-identified most impacted and distressed areas (MID). The MID areas are further described in the Unmet Needs Assessment section.

To streamline the recovery process and hasten recovery activities, HUD included waivers, alternative and additional requirements, and clarifications for CDBG-DR expenditures in the Federal Register Notice (FRN). HCD has addressed these changes throughout this document.

1.2 Disaster Specific Overview

The 2020 wildfire season was the largest and most destructive in California's recorded modern history.¹ In January and February of 2020, California experienced one of the driest periods on record for that time of year, followed by a mass die-off of trees across the state. While consistent rain in March and April alleviated drought conditions, the risk of wildfires remained high for both Northern and Southern California, and the state braced for the summer.

In mid-August 2020, a series of massive and severe summer thunderstorms over Northern California caused a siege of dry lightning, which sparked the first fire of the record-breaking and devastating season. By the end of the year, more than 9,000 fires had claimed 33 lives, burned through an estimated 4,304,370 acres, destroyed or damaged over 11,000 structures, and resulted in over \$12 billion in damages.²

The President issued the first of two major disaster declarations (DR-4558) in August of 2020, which designated 15 counties as eligible for immediate aid. In October, after another wave of fires, which included the largest wildfire in the state's history, the President issued a second declaration (DR-4569), covering 10 counties.³

2020 August and September Wildfires (DR-4558)

On August 16, 2020, severe thunderstorms produced a "lightning siege," during which an unprecedented number of lightning strikes were recorded over California. During the first hours of the storm, approximately 2,500 lightning strikes hit the Bay Area; within the next 96 hours, more than 12,000 lightning strikes were recorded over California.⁴ The siege ignited 650 fires across Northern California, which proliferated and intersected to produce three massive wildfires: the SCU Lightning Complex, the August Complex, and the LNU Lightning Complex. On September 10, 2020, the August Complex fire set a record for the single-largest wildfire in California's history after burning through more than 471,000 acres. The President granted a

¹ California Department of Forestry and Fire Protection (CAL FIRE). "2020 Incident Archive." 2020 Fire Season Incident Archive, n.d. <https://www.fire.ca.gov/incidents/2020/>

² California Department of Forestry and Fire Protection (CAL FIRE). "2020 Wildfire Activity Report (2020 Redbook)," n.d., <https://www.fire.ca.gov/incidents/2020>.

³ Ibid.

⁴ Boxall, Bettina. "Fires of Hell": How Dry Lightning Has Sparked Some of California's Biggest Infernos." Los Angeles Times, August 23, 2020. <https://www.latimes.com/california/story/2020-08-23/dry-lightning-northern-california-fire-scourge>.

⁵ Federal Emergency Management Agency (FEMA). "California Wildfires: DR-4558-CA." FEMA.gov, n.d. <https://www.fema.gov/disaster/4558>.

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major disaster declaration for the State of California on August 20, 2020. The declaration, FEMA DR-4558, spanned an incident period from August 14, 2020-November 17, 2020.⁵

2020 September, October, and November Wildfires (DR-4569)

As the state battled the first onslaught into late September, a record-breaking heat wave and katabatic winds whipped smaller ignitions into new megafires that impacted Fresno, Los Angeles, Madera, Mendocino, Napa, San Bernardino, San Diego, Shasta, Siskiyou, and Sonoma Counties. The new wave prompted a second major disaster declaration on October 16, 2020, and spanned an incident period from September 4, 2020, to November 17, 2020.

2021 July 14, 2021– October 25, 2021, Wildfires (DR-4610)

On August 14, 2021, President Biden declared the Dixie and River wildfires burning in, Lassen, Nevada, Placer, and Plumas counties a Major Disaster and approved FEMA declaration DR-4610. Subsequently, on September 18, 2021, Tehama, and Trinity were added to DR-4610 as the Dixie Fire grew and the Monument Fire swept through Trinity County.

In the 2021 fire season, ongoing drought, extreme heat, reduced snowpack, and vastly diminished tree mass ignited an unusually early wildfire season in California. By July of 2021, fires had burned more than three times as many acres compared to the previous year. The President issued a major disaster declaration for Northern California in August 2021, as the state was facing "unprecedented fire conditions" as new ignitions and megafires raged on. The 2021 wildfire season ultimately sparked approximately 8,600 fires and burned about 2.5 million acres.⁶

The Dixie Fire

The **Dixie Fire** started Tuesday, July 13, 2021, and burned 963,309 acres across five counties, Butte, Plumas, Shasta, Lassen, and Tehama and is currently ranked as California's second largest wildfire. The acreage burned represents an area larger than the state of Rhode Island.⁷ The fire was active for 103 days and resulted in one fatality, 1,311 structures destroyed and 94 structures damaged, and forced the closure of the Lassen National Forest and the Lassen Volcanic National Park. The Park still has some road closures in effect today.

The River Fire

The **River Fire** burned 2,619 acres (1,060 ha) in Nevada County and Placer County. The fire was first reported on Wednesday, August 4, 2021, and was fully contained on Friday, August 13, 2021. The River Fire destroyed 142 structures, damaged 21 more, and resulted in 4 injuries to firefighters and civilians. It was the 5th most destructive fire of 2021 in California. CAL FIRE officials

⁶ California Department of Forestry and Fire Protection (CAL FIRE). "2021 Incident Archive." 2021 Fire Season Incident Archive,

⁷ [Dixie Fire: Some evacuation orders lifted in Butte, Plumas counties for California's largest wildfire \(kcra.com\)](https://www.kcra.com/news/dixie-fire-some-evacuation-orders-lifted-in-butte-plumas-counties-for-california-s-largest-wildfire)

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stated after an investigation that it had been "determined to be of human cause," originating in the overnight camping area of Bear River Campground west of Colfax.⁸

The Monument Fire

The **Monument Fire** was a wildfire west of Big Bar in Shasta-Trinity National Forest. The fire, which was started by a lightning strike, was first reported on July 30, 2021. The communities of Big Flat, Big Bar, Del Loma, and Cedar Flat were evacuated. The fire closed Highway 299 in the area. The fire destroyed 28 structures, and damaged 2 others. The fire burned 223,124 acres and was fully contained on October 25, 2021. The fire was active for 88 days.⁹

1.2.1 Ongoing Threat

The disasters of 2021 were followed closely by yet another devastating fire season in 2022. As of November 23, 2022, 400 wildfires have burned 362,436 acres, killed nine residents, and damaged or destroyed 876 structures.¹⁰

This trend shows no sign of slowing. According to broad scientific consensus, the frequency and severity of wildfires in North America are increasing due to climate change.¹¹ In California, climate change impacts that contribute to wildfire risk include sustained and widespread drought, massive mortality of trees and vegetation coverage, increased severity of seasonal katabatic winds, and others. The state experienced its second driest water year on record in 2021, and as of May 2022, all 58 counties in the state are under a drought emergency proclamation and as of November 2022, 69 percent of counties are in Moderate Drought to Exceptional Drought.¹²

In April of 2018, UCLA released a study on California's climate future, which included a prediction of increased "climate whiplash," defined as the non-incremental transition between very dry and very wet weather. California's Fourth Climate Change Assessment projected that climate change will make forests more susceptible to extreme wildfires, especially if greenhouse gas emissions continue to rise.¹³

According to the Summary of the Fourth Edition of the Indicators of Climate Change in California published November 1, 2022, "Although a naturally occurring feature of California's climate, drought conditions have become more frequent and more intense. A combination of hotter temperatures and low precipitation years – especially when snowpack and snowmelt runoff are low--mean drier conditions. California has been getting drier since 1895. By the end

⁸ <https://www.fire.ca.gov/incidents/2021/>

⁹ [Monument Fire Incident Report \(ca.gov\)](#)

¹⁰ California Department of Forestry and Fire Protection (CAL FIRE). "2022 Incident Archive." 2022 Fire Season Outlook, n.d. <https://www.fire.ca.gov/incidents/2022/>

¹¹ Miller, Rebecca. "Climate Change Is Central to California's Wildfires." Scientific American, October 29, 2020. <https://www.scientificamerican.com/article/climate-change-is-central-to-californias-wildfires/>.

¹² <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA> California | U.S. Drought Monitor (unl.edu)

¹³ State of California, Governor's Office of Planning and Research, the State of California Energy Commission and the California Natural Resources Agency. "California's Fourth Climate Change Assessment." California Climate Assessment, August 27, 2018. <http://www.climateassessment.ca.gov/>.

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of the 2021 water year (which begins in October and ends in September the next year), drought conditions were comparable to those during 2012 to 2016, the most severe drought period on record. In California and across the southwestern United States, 2000 to 2021 has been the driest 22-year period over the past 1,000 years, part of what scientists call an emerging “megadrought” era.”¹⁴

Meanwhile, anthropogenic factors such as ignitions, infrastructure, and development at the wildland-urban interface increase both the likelihood of future wildfires and communities' exposure to those hazards. Approximately 85 percent of all fire ignitions in California are the result of human activity, with the rest due to lightning.

Verisk's most recently updated FireLine Risk Report, which analyzes wildfire risk to residential structures by examining principal factors like flammable vegetation, topography, fire response, infrastructure, and wind patterns, shows that 2 million housing units - 15 percent of the state's total - are at the high and extreme risk of wildfire. Another 1.6 million, or 12 percent, are at moderate risk.¹⁵

The 2020 and 2021 wildfire impacts were severe on their own but were compounded within the context of the COVID-19 pandemic, hindering recovery activities and delaying progress. Furthermore, amidst the long-term recovery from five catastrophic wildfire seasons, in winter and spring 2023, California experienced a wave of intense precipitation events, called atmospheric rivers, that inundated many coastal and low-lying parts of the state. Based on FEMA Individual Assistance data, flooding from intense precipitation events, levee breaches, and spring snowmelt had damaged or destroyed 7,363 residences across the state, although the figure is certainly higher.

Climate change is intensifying California's existing wet and dry cycles, resulting in climate whiplash. As the State of California supports communities with long-term recovery and pre-disaster mitigation, it must help communities contend with concurrent hazard risks amidst climate extremes.

1.3 Summary

The scope and severity of damage wrought by the 2020 and 2021 wildfires is difficult to overstate. These back-to-back years of devastating wildfires ignited as the state continues to recover from the historic back-to-back fire seasons in 2017 and 2018, which impacted dozens of counties across northern and southern California.

The 2020 wildfires claimed 31 lives, destroyed more than 10,000 buildings, burned more than 4 percent of the state's land mass, prompted FEMA IA declarations for 22 counties, and forced the evacuation or displacement of tens of thousands of residents.

The 2020 fires also dealt a severe blow to California's financial resources and recovery infrastructure, which were already beleaguered by the slew of earlier fire and fire-related

¹⁴ 2022 Report, California Office of Environmental Health Hazard Assessment, [Summary - Indicators of climate change in California](#)

¹⁵ Verisk 2021 Wildfire Risk Analysis Provides Updated Data on Rising Threat.” Verisk, October 13, 2021. <https://www.verisk.com/insurance/visualize/verisk-2021-wildfire-risk-analysis-provides-updated-data-on-rising-threat/>.

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environmental disasters and the global COVID-19 pandemic. According to the National Interagency Fire Center, Federal wildfire suppression costs in the United States have spiked from an annual average of about \$425 million from 1985 to 1999 to \$1.6 billion from 2000 to 2019. In California, suppression costs have nearly doubled over the last decade from the previous one, with CAL FIRE estimating \$700 million in spending for the 2019/2020 fiscal year.¹⁶

In addition to the impacts noted above, in 2021, from June to August, wildfires in California had emitted far more planet-warming carbon dioxide than any other summer in nearly two decades, satellite data shows.¹⁷ In the months of June, July, and August, “This [wildfire](#) season so far in [California](#) has been extraordinary, producing thousands of fires — including one that, at [nearly a million acres](#) burned, is the largest single fire in state history — and spewing so much smoke that air quality has been affected thousands of miles away.

Wildfires can have a global climate impact as well, because burning vegetation releases planet-warming carbon dioxide. And from June through August, California fires emitted twice as much CO₂ as during the same period last year, and far more than any other summer in nearly two decades.

That’s the conclusion of the Copernicus Atmospheric Monitoring Service, a European Union-financed agency, which estimates emissions based on satellite measurements available since 2003. Over the three months, it said, [California fires](#) released more than 75 million metric tons of carbon dioxide.”¹⁸

Not only do these wildfires pose a serious threat to local people, landscapes, ecosystems, and property, they also result in major setbacks in the fight against climate change and pose a true existential threat to the planet.

As for the 2022 fire year, according to CAL FIRE, as of November 28, 2022, California has seen a less devastating fire season with 362,455 acres burned, attributed to 7,490 fires. Sadly, though, those fires have caused nine fatalities and fully destroyed 772 structures and damaged another 104.¹⁹

As California prepares for the 2023 fire season, the effects of climate change show no signs of slowing, and areas already damaged by earlier fires and those vulnerable to future disasters are bracing for continued challenges. The fires and megafires that comprised the 2020 and 2021 fire season only further highlight the need for both disaster recovery and mitigation funding, planning, and program implementation in California’s impacted and vulnerable areas.

¹⁶ Jesse Roman, Angelo Verzoni, and Scott Sutherland, “National Fire Protection Association Journal,” NFA Journal - The Wildfire Crisis, November 1, 2021, <https://www.nfpa.org/News-and-Research/Publications-and-media/NFA-Journal/2020/November-December-2020/Features/Wildfire>.

¹⁷ [California’s Wildfires Had an Invisible Impact: High Carbon Dioxide Emissions - The New York Times \(nytimes.com\)](#)

¹⁸ Ibid

¹⁹ [2022 Fire Season Outlook \(ca.gov\)](#)

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All of these impacts further exacerbated the existing housing crisis in California. Communities impacted by the 2020 and 2021 wildfires had low housing vacancies prior to disasters, limiting options for disaster survivors for either temporary or more long-term housing options. High housing costs resulted in rent-burdened households and many who live precariously close to homelessness.

Given the profound destruction and disruption wrought by the 2020 and 2021 wildfires on the State of California, unmet needs in the state’s Most Impacted and Distressed areas (MID) remain significant. HCD is committed to addressing these needs via pursuing additional resources, including additional CDBG-DR funding, and leveraging other resources to support the statewide recovery effort. In addition, HCD continues to coordinate closely with local, state, and federal partners to collect and analyze data, identify resources, and understand how jurisdictions’ unmet needs evolve over time.

The following figure provides a summary of disaster impacts from DR-4558 and DR-4569 using HUD’s unmet recovery needs methodology as outlined in the February 3, 2022, Federal Register Notice.²⁰

FIGURE 1: 2020 UNMET NEEDS CALCULATION - HUD METHODOLOGY

Type	Data Source	Total Impact	Total Resources	Unmet Need	% of Total Allocation
Infrastructure	FEMA Public Assistance (Category C-G Only)	\$53,722,462	\$43,649,500.37	\$10,072,961.63	2%
Infrastructure	FEMA Hazard Mitigation Grant Program	\$92,820,363	\$66,479,431	\$26,340,932	5%
Housing	FEMA Individual Assistance	\$506,090,564	\$42,523,200	\$463,567,364	80%
Economic	SBA - Business	\$86,171,242	\$7,295,400	\$78,875,842	14%
Total	-	\$738,804,631	\$159,947,531.37	\$578,857,099.63	100%

The following table provides a summary of disaster impacts from DR-4610 using HUD’s unmet recovery needs methodology as outlined in the February 3, 2022, Federal Register Notice.

²⁰ Department of Housing and Urban Development (HUD). “Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements Notice.” Federal Register Vol. 87, No. 23 (February 3, 2022): 6364. <https://www.govinfo.gov/content/pkg/FR-2022-02-03/pdf/2022-02209.pdf>

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FIGURE 2: 2021 UNMET NEED CALCULATION – HUD METHODOLOGY

Type	Data Source	Total Impact	Total Resources	Unmet Need	% of Total Allocation
Infrastructure	FEMA Public Assistance (Category C-G Only)	\$ 19,507,662.13	\$ 17,556,896.02	\$ 1,950,766.11	4.5%
Infrastructure	FEMA Hazard Mitigation Grant Program	\$39,232,862.09	\$29,424,646.58	\$9,808,215.53	23%
Housing	FEMA Individual Assistance	\$23,536,291.96	\$4,230,945.00	\$19,305,346.96	45.3%
Economic	SBA - Business	\$16,376,871.62	\$4,778,300	\$11,598,571.62	27.2
Total	-	\$98,653,687.8	\$55,990,787.6	\$42,662,900.22	100%

While the tables above provide the unmet needs calculations based on the methodology outlined in the Federal Register Notice, the State of California submits the following unmet needs calculations using the California Department of Forestry and Fire Protection (CAL FIRE)'s damage survey. Further details of the methodology used can be found in the Unmet Needs section of the document. This methodology uses a property-by-property survey conducted post-disaster of all destroyed properties, which presents a more accurate picture of the unmet recovery needs than FEMA Individual Assistance (FEMA IA) which impacted residents must register for and so only captures a generally small section of the impacted population. Additionally, in fire disaster, for any registrant who states they have insurance, FEMA automatically denies their application for assistance and requires them to reapply and appeal the denial within 60 days if their insurance doesn't cover the full loss. In fire it is rare to have a full insurance settlement that fast so many who are eligible for FEMA assistance, don't get it. In 2018 these automatic denials based on having some level of insurance included nearly 9000 disaster survivors.

The Unmet Needs and Proposed Allocations – 2020 and 2021 tables below show the remaining unmet need, using the CAL FIRE damage survey, across all categories and how California plans to allocate the 2020 and 2021 CDBG-DR dollars to address the need remaining after known investments have been considered.

FIGURE 3: 2020 UNMET NEEDS CALCULATION - ALTERNATIVE METHODOLOGY

Type	Data Source	Total Impact	Total Resources	Unmet Need	% of Unmet Need
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Infrastructure	FEMA Public Assistance (Category C-G Only)	\$53,722,462	\$43,649,500.37	\$10,072,961.63	1%
Infrastructure	FEMA Hazard Mitigation Grant Program	\$92,820,363	\$66,479,431	\$26,340,932	2%
Housing	CAL FIRE Damage Survey	\$1,237,714,545	\$42,523,200	\$1,195,191,345	91%
Economic	SBA - Business	\$86,171,242	\$7,295,400	\$78,875,842	6%
Total		\$1,470,428,612	\$159,947,531.37	\$1,310,481,080.63	100%

FIGURE 4: 2021 UNMET NEEDS CALCULATION - ALTERNATIVE METHODOLOGY

Type	Data Source	Total Impact	Total Resources	Unmet Need	% of Unmet Need
Infrastructure	FEMA Public Assistance (Category C-G Only)	\$ 19,507,662	\$ 17,556,896	\$ 1,950,766	0.7%
Infrastructure	FEMA Hazard Mitigation Grant Program	\$39,232,862	\$29,424,646	\$9,808,215	3.3%
Housing	Cal FIRE Damage Survey	266,963,869	\$4,230,945	262,732,924	92%
Economic	SBA - Business	\$16,376,871	\$4,778,300	\$11,598,571	4%
Total	-	\$342,081,265	\$55,990,787	\$286,090,478	100%

1.4 Proposed Uses of CDBG-DR Funds

HCD proposes the Owner-Occupied Reconstruction (OOR) Program, OOR-Mitigation Program, Multifamily Housing Program (MHP), MHP-Mitigation Program, Homebuyer Assistance Program, and FEMA Public Assistance Match Program for 2020 disasters. For 2021 disasters, HCD proposes a Single Family Reconstruction Program and a Single Family Mitigation Program. While the 2020 OOR and OOR-Mitigation programs only include owner-occupied units, the 2021 Single Family Reconstruction and Single Family Mitigation programs will include

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both owner-occupied single family units and single family rentals, in order to more effectively target local recovery unmet needs.

Housing Programs

Owner-Occupied Reconstruction Program (OOR)

HCD will directly administer this program that will provide rehabilitation or reconstruction assistance, by a grant award, to eligible DR-4558 and Dr-4569 applicants based on the extent of damage to their primary residences. All projects will incorporate wildfire mitigation measures including the use of ignition-resistant building materials and the creation of defensible space, reducing risk from future wildfire disasters. The OOR program will integrate disaster recovery and mitigation activities. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

Single Family Reconstruction Program

HCD will directly administer this program that will provide rehabilitation or reconstruction assistance, by a grant award, to eligible DR-4610 applicants based on the extent of damage to their primary residences or single family rental units. All projects will incorporate wildfire mitigation measures including the use of ignition-resistant building materials and the creation of defensible space, reducing risk from future wildfire disasters. The Single Family Reconstruction program will integrate disaster recovery and mitigation activities. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

OOR Mitigation Program

All projects will incorporate wildfire mitigation measures including the use of ignition-resistant building materials and the creation of defensible space, reducing risk from future wildfire disasters. OOR Mitigation activities will be integrated into rehabilitation or reconstruction projects. Additionally, the OOR Mitigation is available to owner-occupied properties that did not suffer damage in the DR-4558, or DR-4569 events, are located in the MID, and can utilize the mitigation rehabilitation activity to enable the single family unit to meet or exceed the Wildland Urban Interface Code standards to make their homes more resistant to wildfire.

Single Family Mitigation Program

OOR Mitigation is available to owner-occupied and single family rental properties that did not suffer damage, are located in the DR-4610 MID, and can utilize the mitigation rehabilitation

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activity to enable the single family unit to meet or exceed the Wildland Urban Interface Code standards to make their homes more resistant to wildfire.

Homebuyer Assistance Program (HBA)

HBA will be a standalone program run by HCD with the assistance of a non-profit partner and will provide down payment and other housing assistance to low- to moderate-income disaster impacted homeowners, enabling them to relocate outside of high-risk areas or the disaster declared areas.

Multifamily Housing Program (MHP)

The Multifamily Housing Program (MHP) is designed to meet the unmet rental housing need, including the needs of individuals displaced from rental single family, including mobile homes, and multifamily rental units, as well as individuals made homeless as a result from the disaster. Multifamily projects include apartment complexes and mixed-use developments. These developments are also intended to help replace or add new rental housing units available to Housing Choice Voucher holders that were lost. The objective of the CDBG-DR funds is to provide necessary gap financing for the development of rental housing units in the HUD MID areas from DR-4558 and DR-4569. HCD will directly administer the program and enter into agreements with project developers. HCD has established regional set-asides to allocate funds within the MID counties.

Multifamily Mitigation Program

The program will provide hardening and wildfire retrofitting of multifamily units to withstand future disasters by increasing resilience to future wildfires and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship. HCD will directly administer this program and competitively award to multifamily developers. Mitigation set-aside funds are available to cover up to 5 percent of project activities involved with the rehabilitation, reconstruction, or new construction of multifamily housing, that meet the mitigation definition.

Federal Emergency Management Agency Public Assistance Match Program (FEMA PA)

The Infrastructure Program aligns infrastructure investments with other planned federal funds in that the CDBG-DR funds will be used to fund the non-federal share match on approved FEMA Public Assistance (PA) projects. Projects will be awarded to subrecipients and general units of local government, through a competitive application.

FIGURE 5: UNMET NEED AND PROPOSED ALLOCATION – 2020

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration	\$0.00	0%	\$11,560,150.00	5%
Planning	\$0.00	0%	\$0.00	0%

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Housing	\$1,195,191,345.00	91%	\$183,353,952	79.3%
Economic Revitalization	\$78,875,842.00	6%	\$0.00	0%
Infrastructure	\$36,413,893.63	3%	\$7,639,748.00	3.3%
Economic Revitalization	\$78,875,842.00	6%	\$0.00	0%
Public Services	\$0.00	0%	\$0.00	0%
Mitigation	\$0.00	0%	\$28,649,150	12.4%
Total	\$1,310,481,080.63	100%	\$231,203,000.00	100%

Data Source(s): California Department of Forestry and Fire Protection (CAL FIRE) damage survey

*Allocation Amount includes project delivery costs and does not include administration and planning costs.

FIGURE 6: UNMET NEED AND PROPOSED ALLOCATION – 2021

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration	0	0	\$1,220,400	5%
Planning	0	0	0	0
Housing	\$262,732,924.90	92%	\$20,162,800	83%
Economic Revitalization	\$11,598,571.62	4%	0	0
Infrastructure	\$11,758,981.64	4%	0	0
Mitigation	0	0	\$3,024,800	12%
Total	\$286,090,478.16	100%	\$24,408,000	100%

2. Unmet Needs Assessment

The State of California completed the following needs assessments to identify the effects, long-term needs, and priorities for CDBG-DR funding allocated as a result of the 2020 and 2021

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wildfire disasters. The three presidentially declared disasters covered by these needs assessments include the FEMA declarations DR-4568, DR-4569, and DR-4610.

The needs assessment includes specific details about unmet needs within the eligible and Most Impacted and Distressed communities. This includes details for housing, infrastructure, and economic revitalization. The assessments take into consideration pre-disaster needs in addition to unmet recovery needs resulting from the 2020 and 2021 disasters. The assessments discuss additional types of assistance that may be available to affected communities and individuals, such as insurance, other federal assistance or other possible funding sources.

HCD understands that additional information may become available, and anticipates that if additional funds are allocated, there may be a different methodology for the distribution of funds. Adjustments to the Action Plan may be needed as a result of additional data or modified distribution methods; HCD will amend this assessment and the Action Plan as needed in the future.

The table below lists the counties that FEMA designated for FEMA IA following the wildfires of 2020 and 2021, which were comprised of three FEMA disaster declarations: DR-4568, DR-4569, and DR-4610. The FEMA IA designation allows the individuals and households in these counties to apply for financial and direct services after a federally declared disaster. These jurisdictions are also referred to as ‘disaster-impacted counties’ .

FIGURE 7: FEMA IA DECLARED COUNTIES

2020 DR-4558	2020 DR-4569	2021 DR-4610
Butte, Lake, Lassen, Mendocino, Monterey, Napa, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma, Stanislaus, Trinity, Tulare, Yolo	Fresno, Los Angeles, Madera, Mendocino, Napa, San Bernardino, San Diego, Shasta, Siskiyou, Sonoma	Lassen, Nevada, Placer, Plumas, Tehama, Trinity

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HUD determines MID areas using the following factors:²¹

- Areas where FEMA has determined the damage was sufficient to declare the disaster(s) eligible to receive Individual and Households Program (IHP) funding
- Areas with concentrated damage defined as:
 - Counties exceeding \$10 million in serious unmet housing needs
 - Zip codes with \$2 million or more of serious unmet housing needs
 - Disaster meeting the Most Impacted threshold
 - One or more counties that meet the definition of Most Impacted and Distressed
 - An aggregate of Most Impacted zip codes of \$10 million or more

²¹ HUD, Federal Register Vol. 87, No. 23 (February 3, 2022): 6364.

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For 2020, HUD designated five counties (Butte, Napa, Santa Cruz, Los Angeles, and Siskiyou) and nine zip codes (95448 (Sonoma County), 95688 (Solano County), 93602 (Fresno County), 93664 (Fresno County), 94558 (Napa County), 94574 (Napa County), 95404 (Sonoma County), 95409 (Sonoma County), and 96047 (Shasta County) as MID areas from the DR-4558 and DR-4569 disasters.

The Federal Register Notice provided clarification that, where HUD has identified an entire zip code as a MID area for the purposes of allocating funds, a grantee may expand program operations to the whole county or counties that overlap with that zip code. HCD proposes to expand eligibility to the county level for all nine identified zip codes.

The table below lists the counties that FEMA designated for FEMA IA following the wildfires of 2020, which were comprised of two FEMA disaster declarations: DR-4568 and DR-4569. FEMA IA designation allows the individuals and households in these counties to apply for financial and direct services after a federally declared disaster. These jurisdictions are also referred to as ‘disaster-impacted counties.’

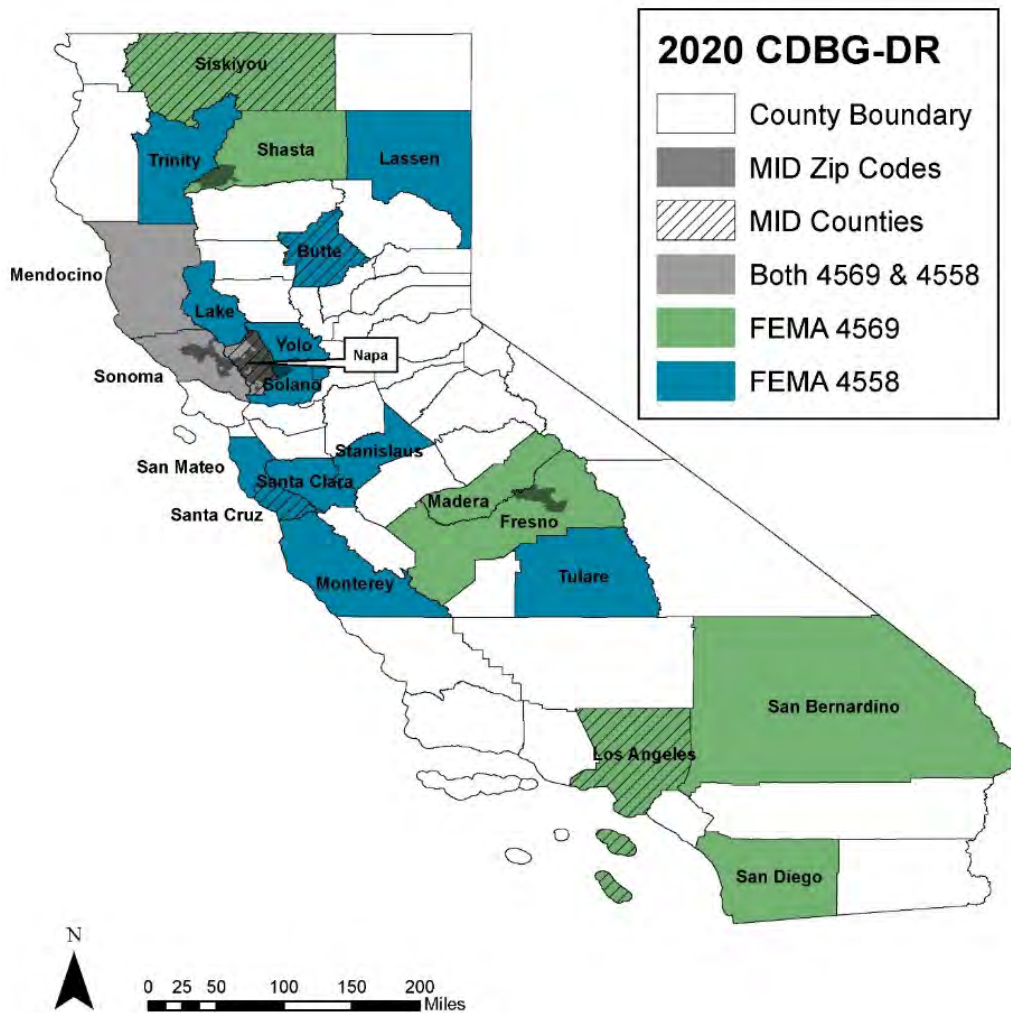
FIGURE 8: FEMA IA DECLARED COUNTIES AND HUD MID

2020 DR-4558	2020 DR-4558 HUD MID	2020 DR-4569	2020 DR-4569 HUD MID	2021 DR-4610	2021 DR-4610 HUD MID
Butte	X	Fresno	X	Lassen	
Lake		Los Angeles	X	Nevada	
Lassen		Madera		Placer	
Mendocino		Mendocino		Plumas	X
Monterey		Napa	X	Tehama	
Napa	X	San Bernadino		Trinity	
San Mateo		San Diego			
Santa Clara		Shasta	X		
Santa Cruz	X	Siskiyou	X		
Solano	X	Sonoma	X		
Sonoma	X				
Stanislaus					
Trinity					
Tulare					

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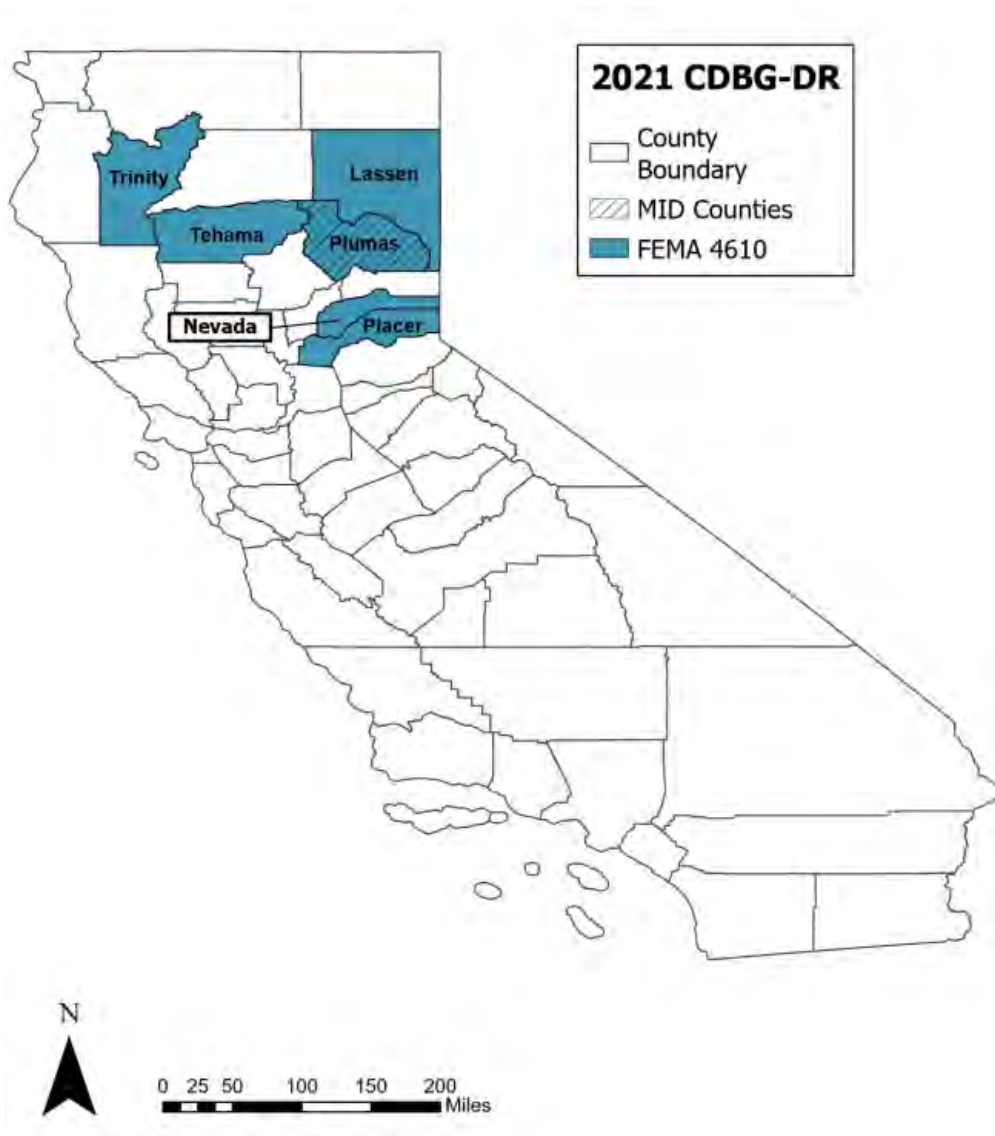
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FIGURE 9: DR-4558 & DR-4569 MOST IMPACTED AND DISTRESSED AREAS - 2020 DISASTERS



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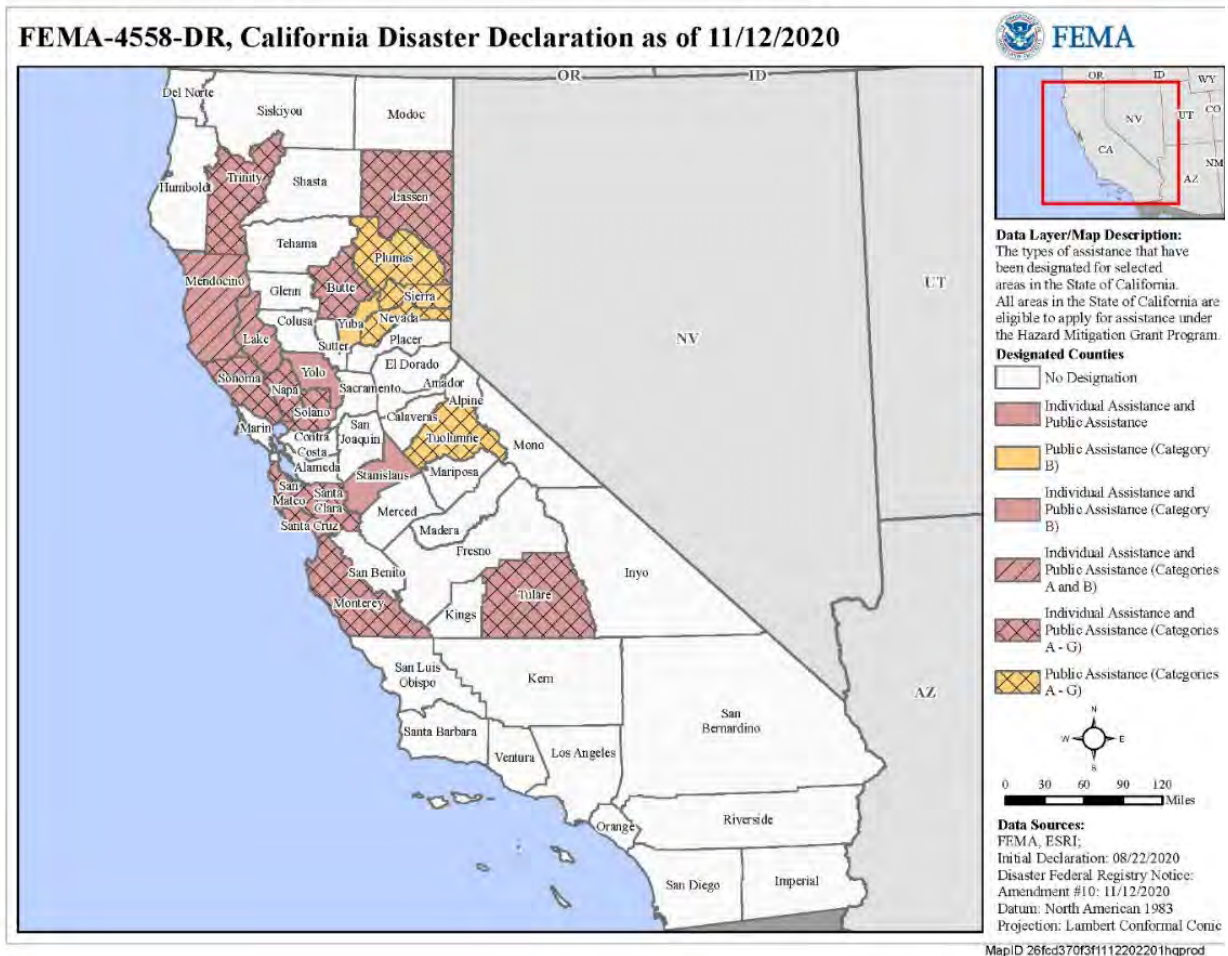
FIGURE 10: DR-4610 CDBG-DR (IMPACTED AND MID COUNTIES MAP) – 2021 DISASTERS



The following FEMA maps illustrate the federally declared disaster areas and the type of FEMA funding approved for each impacted county for DR-4558, DR-4569 and DR-4610.

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FIGURE 11: FEMA DR-4558 DISASTER DECLARATION AREAS



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FIGURE 12: FEMA DR-4569 DISASTER DECLARATION AREAS

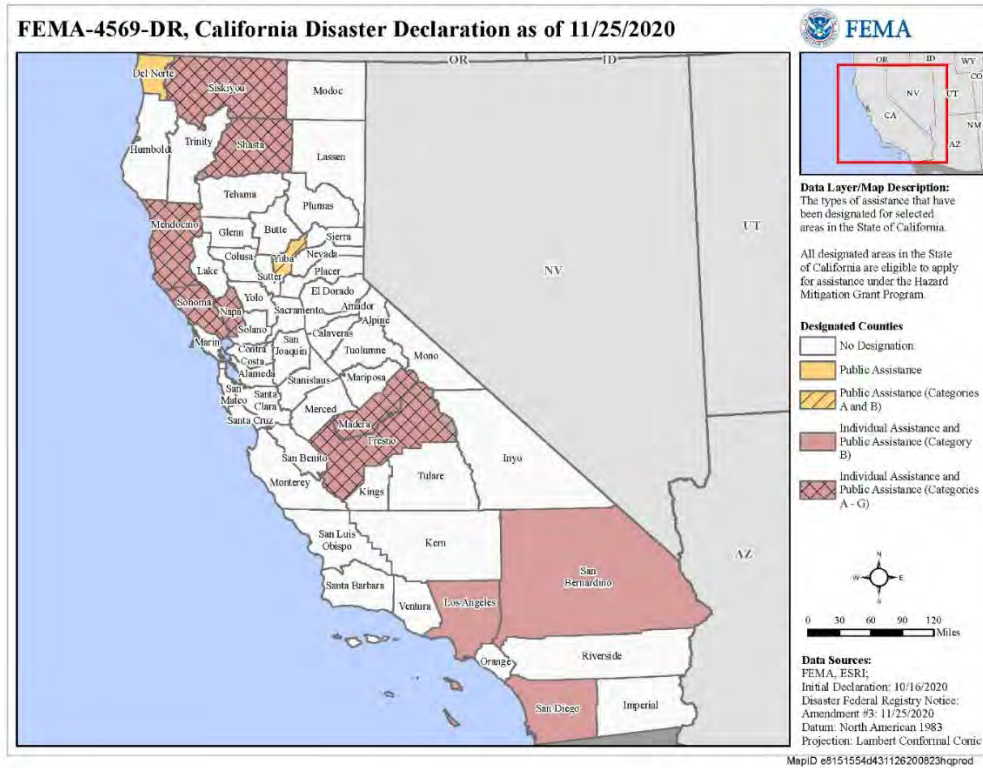
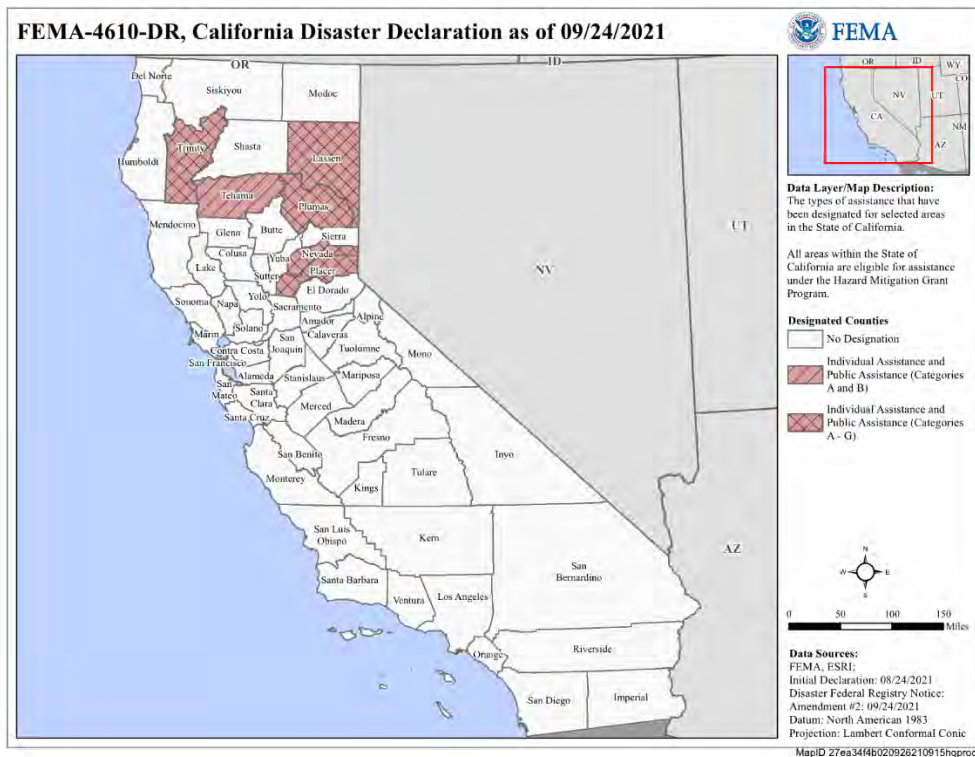


FIGURE 13: FEMA DR-4610 DISASTER DECLARATION AREAS



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2.1 Housing Unmet Need

Given the protracted housing crisis in California, DR-4558, DR-4569 and DR-4610 led to significant impacts on housing in impacted areas. The geographic spread of the disasters across the State of California also presents challenges for identifying consistent data to understand housing unmet needs. This section examines the data available to understand impacts to housing across the disaster area.

Sources include FEMA Individual Assistance, SBA, California's Department of Forestry and Fire Protection (CAL FIRE) Damage Inspection, the Census and American Community Survey, Continuum of Care Point-in-Time Counts, Centers for Disease Control social vulnerability data, Housing and Urban Development (HUD) income data, and insurance claim information provided by the California Department of Insurance (CDI).

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as "cost-burdened." Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation²², and childcare, and often lack adequate savings to spend on evacuation, shelter, or recovery from disaster scenarios.²³ Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. Plumas County's housing cost burden rate is 36.8 percent, while Lassen County's is 36.4 percent. Butte, Monterey, Napa, Placer, Santa Cruz, Solano, Sonoma, Stanislaus, Trinity, Tulare, Yolo, Fresno, Los Angeles, Napa, San Bernadino, San Diego, Shasta, and Sonoma County all have populations that are at least 50 percent cost-burdened, and Nevada and Tehama counties are at nearly 60 percent.

2.1.1 Disaster Damage and Impacts

Overview of Data Sources

Given the protracted housing crisis in California, DR-4558, DR-4569, and DR-4610 led to significant impacts on housing in impacted areas. The geographic spread of the disasters across the State of California also presents challenges for identifying consistent data to understand housing unmet needs. This section examines the data available to understand impacts to housing across the disaster area.

Sources: FEMA Individual Assistance, SBA, California's Department of Forestry and Fire Protection (CAL FIRE) Damage Inspection, the Census and American Community Survey, Continuum of Care Point-in-Time Counts, Centers for Disease Control social vulnerability data, Housing and Urban Development (HUD) income data, and insurance claim information provided by the California Department of Insurance (CDI).

The scope and severity of damage wrought by the 2020 and 2021 wildfires is difficult to overstate. The 2020 wildfire season ignited as the state was recovering from previous historic

²² [California Housing and Transportation Costs: Impacts and Implications | California Air Resources Board](#)

²³ Ibid.

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fire seasons in 2017 and 2018, which impacted dozens of counties across Northern California. The 2020 wildfires claimed 31 lives, destroyed more than 10,000 buildings, burned more than 4 percent of the state's land mass, prompted FEMA IA declarations for 22 counties, and forced the evacuation or displacement of tens of thousands of residents.

The 2021 season included California's largest single, non-complex, fire and the second largest wildfire in California's history, the Dixie fire, burning nearly 1,000,000 acres, and claimed the life of one person, injured four others, destroyed 1,311 structures,²⁴ damaged another 94, closed the Lassen National Forest for nearly a year, decimated the entire communities of Greenville and Canyon Dam and forced the evacuation and displacements of tens of thousands of residents.

In the DR-4610 MID, Plumas County experienced significant housing supply impacts, relative to its size and compounded by its remote location.

- According to CAL FIRE, 779 housing units and 144 commercial structures were damaged or destroyed, creating 609 newly vacant parcels.
- Plumas County lost most of its naturally-affordable rental housing stock, primarily single-family and manufactured units.
- Home prices increased by about 46 percent from pre-fire to post-fire, while average fair market rents increased by over 20 percent.

In California, suppression costs have nearly doubled over the last decade from the previous one, with CAL FIRE estimating \$700 million in spending for the 2019/2020 fiscal year, which has put further heavy pressure on California's financial resources and recovery infrastructure, given the slew of earlier fire and fire-related environmental disasters and the global COVID-19 pandemic. As well, according to the National Interagency Fire Center, Federal wildfire suppression costs in the United States have spiked from an annual average of about \$425 million from 1985 to 1999 to \$1.6 billion from 2000 to 2019.

As California prepares for the 2023 fire season, the effects of climate change show no signs of slowing, and areas already damaged by earlier fires and those vulnerable to future disasters are bracing for continued challenges. The fires and megafires that comprised DR-4558, DR-4569, and DR-4610 only further highlight the need for both disaster recovery and mitigation funding, planning, and program implementation in California's impacted and vulnerable areas.

Of course, all of these impacts further exacerbated the existing housing crisis in California. Communities impacted by the 2020 and 2021 wildfires had near zero housing vacancies prior to disasters, limiting options for disaster survivors for either temporary or more long-term housing options. High housing costs resulted in rent-burdened households, which adds to the number of those already living precariously close to homelessness.

2.1.2 Limitations of Data

This section presents an analysis of FEMA IA, SBA, CAL FIRE and CDI data to reflect damage caused by DR-4558, DR-4569, and DR-4610, and demonstrates the ongoing unmet recovery needs of residents impacted by the disasters. Ultimately, no one data source accurately

²⁴ <https://www.fire.ca.gov/incidents/2021/7/13/dixie-fire/>

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captures the populations impacted by DR-4558, DR-4569, and DR-4610. This Action Plan and unmet needs analysis captures a point in time and reflects the best available data at the time of its publication. In addition to using the process outlined for understanding housing unmet needs provided by HUD, HCD presents an alternative methodology using CAL FIRE's damage collection data.

This alternative methodology continues to rely on verified inspections of properties, and more accurately captures LMI household impacts. HUD's continued reliance on FEMA's data automatically excludes LMI households due to presence of insurance, no matter how much or how little insurance there is. This FEMA policy results in more than 3,700 not included in HUD's data with verified inspection and loss through CalFire data. This number represent nearly double what FEMA has included in its data set for DR 4558 and 4569 combined (1,573).

- **FEMA Individual Assistance (IA)** – The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. Residents register voluntarily for FEMA IA, and eligible applicants include both renters and owners. FEMA Verified Loss awards only provide assistance for repair and replacement to make the home habitable. As the data limitations above note, residents must register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. While the FEMA-IA dataset alone does not represent the full scale of the disaster impacts, data available at the household level, including income and damage, allows for an analysis that follows the unmet needs calculation outlined in the Federal Register Notice.
- **Small Business Administration (SBA)** – Similar to FEMA IA, the SBA disaster loan program is a voluntary program available to impacted households. As a loan program, SBA residential loan registrations skew towards homeowners. However, compared to FVL inspections, which only cover the cost for repair and replacement, SBA loan amounts are based on an inspection that covers the full cost to restore a home.
- **CAL FIRE Damage Inspection** – As the state fire agency, CAL FIRE deploys inspectors after all disasters within the State of California. Using ArcGIS, inspectors use parcel maps to document damage by property. The damage inspection includes parcel, address, structure type, construction type, damage categories, and vegetation clearance information for all impacted properties. This parcel-by-parcel survey includes commercial, mobile home, outbuildings and detached structures, and residential structures. For purposes of this analysis, HCD limited the CAL FIRE data to residential structures, including single family, multifamily, and mobile home structures. This parcel level assessment provides a more robust picture of structural damage but does not include damage estimate amounts or information on the household resident.
- **California Department of Insurance Claims (CDI)** – While floods and hurricanes can rely on National Flood Insurance Program data, fire damage must be collected from individual insurance companies. HCD requested address level insurance claim information for disaster impacted households through the CDI, but household level information on claims was not available. However, the California Department of Insurance collected information from individual insurance companies on claims by zip code. As better data becomes available, HCD will provide an updated estimate of claims

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by household. This data covers a large period of time and does not guarantee that claims are disaster related.

- **American Community Survey 2019 (ACS-5 Year) and Decennial Census (DEC 2020)** – The American Community Survey (ACS) is ongoing and updated annually and is based on a sample of United States residents (3.5 million) in the 50 states. The ACS asks more comprehensive questions than the 10-year census with the goal of “providing current information to communities every year... for programs, economic development, emergency management, and understanding local issues and conditions”. The decennial census, on the other hand, is conducted every ten years and counts every person living in the United States. The census asks a shorter set of questions concerning age, sex, race, Hispanic origin, and owner/renter status. The goal of the census is to “provide an official count of the population... (and) provide critical data that lawmakers and many others use to provide daily services, products, and support for communities”²⁵. Both the ACS and DEC data are displayed at a county level in this report and therefore, may aggregate the data in a way that obscures important details. For example, poverty rate may be low at a county-level but concentrated in just a few zip codes which may be more vulnerable.
- **Center for Disease Control/ Agency for Toxic Substances and Disease Registry Social Vulnerability Data** – The CDC/ATSDR Social Vulnerability Index was created as a geographic database to help emergency response planners and public health officials identify and map communities to prepare and respond to disaster events. The index ranks each census tract in the United States (and aggregates into the county level) on 15 social factors, including socioeconomic status – below poverty, unemployment rate, income, no high school diploma, household composition and disability – age 65 or older, age 17 or younger, civilian with a disability, single parent households, minority status and language – minority and speaks English “less than well”, and housing type and transportation – multi-unit structures, mobile homes, crowding, no vehicle, and group quarters²⁶. The benefit of this data is that it provides an aggregate score to better understand holistic vulnerabilities compared to similar geographies around the United States. The limitation of this data is that it was last updated in 2018 and therefore, may be outdated.
- **Homeless Point-In-Time Count** – The Point-In-Time (PIT) Count is an annual count conducted by every Continuum of Care (CoC) in the country over the course of a single night in January. It counts the number of people housed in emergency shelter, transitional housing, Safe Havens, and the number of people who are unsheltered. Because the count only takes place on one day, it is a static count and may not reflect annual numbers. Because point-in-time counts include the number of people sleeping outside and in shelters, they often undercount the “hidden homeless” - people

²⁵ “Understanding and Using the American Community Survey,” Census.gov, February 2021, https://www.census.gov/content/dam/Census/library/publications/2021/acs/acs_pums_handbook_2021.pdf.

²⁶ Centers for Disease Control and Prevention, “CDC SVI Documentation 2018.”

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experiencing homelessness who are sleeping in motels, on friends' couches, in cars, etc. This count often underestimates children and families experiencing homelessness.²⁷

- **Low- and Moderate- Income Data** – This data is available on the HUD Exchange at the block group, census tract, and county level. The limitation of this data is that the LMI calculations come from the 2011-2015 ACS data and may be outdated. Percent LMI is used to determine if programs meet national objectives for Community Development Block Grant funding. According to the description of the LMI data provided, the statistical information used in the calculation of estimates identified in the data sets comes from two sources: 1) the 2011-2015 American Community Survey (ACS), and 2) the Income Limits for Metropolitan Areas and for Non-Metropolitan Counties. The data necessary to determine an LMI percentage for an area is not published in the publicly available ACS data tables. Therefore, the Bureau of Census matches family size, income, and the income limits in a special tabulation to produce the estimates.²⁸
- **Housing and Urban Development (HUD) Income Limit Data** - This data is available on the HUD Exchange at the block group, census tract, and county level. The HUD limits calculate the extremely low (30 percent) income limits, very low (50 percent) income limit and low (80 percent) income limits for one person to eight person families for every county and state in the United States. The limits are recalculated annually to determine eligibility for public housing, section 8 vouchers, and disabilities and elderly programs.²⁹

2.1.3 Impact on Housing in the Most Impacted and Distressed Areas

Insurance

While standard homeowners' insurance does cover losses from a wildfire, many policies do not provide enough funding to replace the entire home. In fact, high rates of underinsured property owners put increasing strain on disaster recovery and rebuilding needs. And, often the costs of meeting updated building codes further exacerbate the gap between residential insurance claim payout and the actual cost to rebuild. In the majority of cases, there is a shortfall in insurance proceeds needed to rebuild homes, especially to a more resilient, ignition resistant standard.

The state enacted two laws to help insured victims of wildfire. AB 1799 (Chapter 69, Statutes 2018) requires that insurance companies provide standardized information to wildfire victims after they have suffered a loss, including information on the coverage they have paid for, their full insurance policy, endorsements, and their declaration page to better inform wildfire victims. The second, AB 1797 (Chapter 205, Statutes 2018), requires that insurers writing residential property insurance conduct a replacement cost estimate on an every-other year basis. This would ensure policy holders are covered with current and timely estimates that accurately reflect their property's value.

²⁷ Agans, Robert P., Jefferson, Malcolm T., Bowling, James M., Zeng, Donglin, Yang, Jenny and Silverbush, Mark. "Enumerating the Hidden Homeless: Strategies to Estimate the Homeless Gone Missing From a Point-in-Time Count" *Journal of Official Statistics*, vol.30, no.2, 2014, pp.215-229. <https://doi.org/10.2478/jos-2014-0014>

²⁸ "FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data," HUD Exchange (Department of Housing and Urban Development, n.d.), <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>.

²⁹ "Income Limits (2021)," Datasets (HUD Office of Policy Development and Research, April 1, 2021), https://www.huduser.gov/portal/datasets/il.html#2021_query.

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The California Department of Insurance (CDI) is the State of California's branch of a national system of insurance regulators and monitors. CDI's main function is to protect consumers by overseeing insurance companies, performing financial reviews and examining insurers doing business in California. CDI enforces insurance laws and has authority over how insurers and licensees conduct business in California.

DR-4558, DR-4569, and DR-4610 Residential Insurance Claims

Following the DR-4558 and DR-4569 disasters, 31,121 residential claims were filed. The number of claims for total losses was 2,986 claims and the sum of losses incurred was about \$3.7 billion.

For the 2020 disasters, the total claims filed within the Most Impacted and Distressed areas represented 55 percent of the claims in the MID Counties and 20 percent of the claims in the MID zip codes. MID counties also represented 58 percent of total claims resulting in total loss and MID zip codes represent 38 percent of total claims resulting in total loss. The sum of the losses incurred in the MID counties was \$2,151,660,054, or 58 percent of the total losses incurred, and the sum of losses incurred in the MID zip codes was \$1,805,900,609, or 49 percent of total losses incurred. Total losses were highest in Santa Cruz County at about \$800 million, and the 94574 zip code at about \$476 million. The 96047 incurred the lowest amount of direct loss at \$36 million.

For 2021, total claims filed within Plumas County (the only MID) represented 36 percent of total claims, 43 percent of claims resulting in a loss, and 43 percent of total losses across all five counties included in the federal disaster declaration.

FIGURE 14: MID RESIDENTIAL INSURANCE CLAIMS

Counties	Sum of Number of Claims	Sum of Number of Claims Resulting in Total Loss	Sum of Losses Incurred
DR-4558 and DR-4569 2020 MID Counties			
Butte	1,151	511	\$275,660,707
Napa	2,240	393	\$785,190,738
Santa Cruz	5,631	702	\$896,012,754
Los Angeles	8,137	67	\$166,775,590
Siskiyou	106	68	\$28,020,265
Most Impacted and Distressed Total for 2020 Counties	17,265	1,741	\$2,151,660,054

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DR-4458 and DR-4569 2020 MID Zip Codes			
93602 (Fresno County)	407	156	\$100,234,661
93664 (Fresno County)	326	101	\$74,616,120
94558 (Napa County)	521	172	\$157,694,393
94574 (Napa County)	706	144	\$476,797,756
95404 (Sonoma County)	307	77	\$113,990,526
95409 (Sonoma County)	2,837	160	\$385,546,610
95448 (Sonoma County)	241	60	\$95,379,272
95688 (Solano County)	894	213	\$365,367,329
96047 (Shasta County)	117	47	\$36,273,942
Most Impacted and Distressed Total 2020 for Zip Codes	6,356	1,130	\$1,805,900,609
DR-4610 2021 MID County and MID Totals for 2021			
Plumas	961	291	\$282,159,328

2.1.4 Single Family v. Multifamily Needs; Owner Occupied v. Tenant

HCD will implement a suite of housing recovery programs to address the unmet recovery need in the HUD MID areas: an Owner-Occupied Housing Rehabilitation and Reconstruction Program (OOR), a Homebuyer Assistance Program (HBA) and a Multifamily Housing Program (MHP). Further details are provided in this Action Plan in the Housing Recovery Programs section.

For the 2020 disaster year, together, the housing programs will receive \$183,353,952 of the received CDBG-DR funds. This represents approximately 96 percent of the CDBG-DR funds allocated in PL 117-43 to the State of California. The unmet needs analysis identified a total housing unmet recovery need of \$463,567,364, for both owner-occupied and rental dwellings.

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For the 2021 disaster year, housing programs will receive \$20,162,800, while mitigation programs will receive \$3,024,800.

Affordable Rents

Eligibility of multifamily project proposals to be funded by CDBG-DR will be assessed by HCD. Specific eligibility criteria requires that a proposed project must plan for a minimum of 51 percent of units to be affordable units. HCD is proposing to establish program affordable rents at the annual [Multifamily Tax Subsidy Projects \(MTSP\) Regular Income Rent Limits](#) for each applicable area.

HCD will determine the number of units in an approved multifamily development that will be leased to tenants with an income of up to 80 percent of the AMI based on regulatory and program requirements.

Any new construction, rehabilitation, or reconstruction of affordable rental housing projects shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55 years.

FEMA Individual Assistance

The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. However, as the data limitations above note, residents must voluntarily register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. Despite these limitations, the following section provides an overview of the housing impacts for FEMA Disasters 4558, 4569, and 4610. Across the 2020 disasters, a total of 42,010 households registered for FEMA IA assistance, including 21,284 owner-occupied households and 20,626 renter households. For the 2021 disaster, a total of 1997 households registered for FEMA IA, including 905 owner-occupied households and 1081 renter households. The 2020/2021 FRN outlines the following the damage categories by owner-occupied and rental units:

FEMA Inspected Owner Units

- **Minor-Low:** Less than \$3,000 of FEMA inspected real property damage.
- **Minor-High:** \$3,000 to \$7,999 of FEMA inspected real property damage.
- **Major-Low:** \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Owner Units - Personal Property

- **Minor-Low:** Less than \$2,500 of FEMA inspected personal property damage.
- **Minor-High:** \$2,500 to \$3,499 of FEMA inspected personal property damage.

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- **Major-Low:** \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Rental Units

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage.
- **Minor-High:** \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.
- **Major-Low:** \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.
- **Major-High:** \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

The following table provides a breakdown by disaster and by tenure of FEMA IA applicants. For DR-4558, Santa Cruz, Butte, Sonoma, and Napa Counties had the highest total FEMA IA registrants, and the registrants for both renters and owners were nearly equal. For DR-4569, Los Angeles and San Diego Counties had the highest number of FEMA IA registrations, reflecting the impacts but also higher population centers than many of the other impacted Counties. For DR-4610, of the total FEMA IA registrations, Plumas had the highest number of total registrations and owner and renter registrations. Placer County’s registrations had the second highest number of registrations across all categories, which were about half of the totals seen in Plumas.

FIGURE 15: TOTAL FEMA IA REGISTRATIONS BY DISASTER

Total 2020 Disaster	Owner	Renter	Grand Total
DR-4558 Counties: Butte, Lake, Lassen, Mendocino, Monterey, Napa, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma, Stanislaus, Trinity, Tulare, Yolo	14,689	14,944	29,633
DR-4569 Counties: Fresno, Los Angeles, Mendocino, Napa, San Diego, Shasta, Siskiyou, Sonoma	6,995	5,682	12,377
Total 2021 Disasters	21,384	20,626	42,010

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DR-4610 Counties: Lassen, Nevada, Placer, Plumas, Tehama, Trinity	905	1,081	1,996
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Source: FEMA, November 2021; FEMA, Oct 2022

The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. However, as the data limitations above note, residents must voluntarily register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. Despite these limitations, the following section provides an overview of the housing impacts for FEMA Disaster 4610. Across disasters, a total of 1,996 households registered for FEMA IA assistance, including 905 owner-occupied households and 1081 renter households.

FEMA DR-4610 impacted large portions of the State of California and the FEMA IA registrations by county below show how impacts varied across the state. For DR-4610, four counties had the highest total FEMA IA registrants, and the registrants for both renters and owners were nearly equal.

While total registrations show the scale and scope of the disaster impacts, FEMA Verified Loss provides a more accurate understanding of households that not only registered for FEMA, but also inspected by FEMA for a documented loss related to the disaster, a FEMA Verified Loss. The following figure provides an overview of the number of FEMA Verified Losses over \$0 for both owner-occupied and renter-occupied units.

FIGURE 16: FEMA INDIVIDUAL ASSISTANCE VERIFIED LOSSES BY RENTER AND OWNER

Disaster Declaration	Owner	Renter	Total
DR-4558	1,147	1,577	2,724
DR-4569	533	437	970
DR-4610	139	226	365

Source: FEMA, March 2022; FEMA, May 2023.

The previous figure provides an overview of the total count of FEMA IA Verified Losses, but to understand the costs measured through data collected by FEMA, the following provides an overview of average FEMA Verified Losses for properties with over \$0 in losses. This figure includes both Personal Property (Renter) and Real Property (Owner) damages. These numbers do not reflect the total cost needed for reconstruction of owner-occupied or renter-occupied households.

FIGURE 17: AVERAGE FEMA IA VERIFIED LOSS - OVER \$0

Disaster Declaration	Owner	Renter	Total
DR-4558	\$57,569	\$4,863	\$27,099
DR-4569	\$42,276	\$6,418	\$26,165

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DR-4610	\$158,982	\$6,362	\$64,482
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Source: FEMA, May 2023

The following figure provides an overview of the personal- property, FEMA Verified Losses, over \$0 by county for both owner-occupied and renter-occupied units. Plumas County had the highest personal- property FVL for renters and owners, while renters experienced higher FVL.

FIGURE 18: DR- 4610 TOTAL FEMA IA VERIFIED LOSS FOR PERSONAL PROPERTY BY RENTER AND OWNER

County	Owner	Renter	Total
Lassen	\$22,196.55	\$29,782.59	\$51,979.14
Nevada	\$125,890.05	\$79,061.46	\$204,951.51
Placer	\$54,255.27	\$88,779.86	\$143,035.13
Plumas	\$816,751.56	\$1,191,091.98	\$2,007,843.54
Tehama	\$8,054.73	\$0.00	\$8,054.73
Trinity	\$91,391.63	\$49,083.36	\$140,474.99
Total	\$1,118,539.79	\$1,437,799.25	\$2,556,339.04

Source: FEMA, Oct 2022

The table below provides an overview of the FEMA Verified Losses over \$0 by county for real-property, owner-occupied, since FEMA does not inspect rental properties for real property damage. Plumas County had the highest real-property for owner FVL.

FIGURE 19: DR-4610 TOTAL FEMA IA VERIFIED LOSS FOR REAL PROPERTY BY RENTER AND OWNER

County	Owner	Renter	Total
Lassen	\$79,122.04	0	\$79,122.04
Nevada	\$2,631,446.54	0	\$2,631,446.54
Placer	\$1,090,167.23	0	\$1,090,167.23
Plumas	\$15,474,510.54	0	\$15,474,510.54
Tehama	\$254,074.05	0	\$254,074.05
Trinity	\$1,450,632.52	0	\$1,450,632.52
Total	\$20,979,952.92	0	\$20,979,952.92

Source: FEMA, Oct 2022

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The following figures show the overall view of allocated awards for different purposes for both owner-occupied and renter-occupied units by county. Plumas County has received the highest awards for personal- property, repair, and replacement.

FIGURE 20: DR-4610 TOTAL FEMA IA AWARD FOR PERSONAL PROPERTY BY RENTER AND OWNER

County	Owner	Renter	Total
Lassen	\$0.00	\$6,533.44	\$6,533.44
Nevada	\$53,828.72	\$45,389.36	\$99,218.08
Placer	\$3,062.99	\$20,341.33	\$23,404.32
Plumas	\$339,257.40	\$707,273.91	\$1,046,531.31
Tehama	\$0.00	\$0.00	\$0.00
Trinity	\$78,099.30	\$25,003.94	\$103,103.24
Total	\$474,248.41	\$804,541.98	\$1,278,790.39

Source: FEMA, Oct 2022

FIGURE 21: DR-4610 TOTAL FEMA IA AWARD FOR REPAIR BY RENTER AND OWNER

County	Owner	Renter	Total
Lassen	\$5,156.84	0	\$5,156.84
Nevada	\$2,447.84	0	\$2,447.84
Placer	\$210.66	0	\$210.66
Plumas	\$32,463.90	0	\$32,463.90
Tehama	\$0.00	0	\$0.00
Trinity	\$3,291.70	0	\$3,291.70
Total	\$43,570.94	0	\$43,570.94

Source: FEMA, Oct 2022

FIGURE 22: DR-4610 TOTAL FEMA IA AWARD FOR REPLACE BY RENTER AND OWNER

County	Owner	Renter	Total
Lassen	\$36,000.00	0	\$36,000.00
Nevada	\$275,506.30	0	\$275,506.30
Placer	\$137,344.13	0	\$137,344.13

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Plumas	\$2,172,154.56	0	\$2,172,154.56
Tehama	\$36,000.00	0	\$36,000.00
Trinity	\$251,578.68	0	\$251,578.68
Total	\$2,908,583.67	0	\$2,908,583.67

Source: FEMA, Oct 2022

Impact on Renters

Through FEMA IA, renters are eligible to apply for monthly rental assistance and for funding to replace damaged or destroyed personal property. FEMA does not inspect rental properties for real property damage, so the following table only includes personal property damage. The following figure shows the number of renters who registered for FEMA IA that have a Verified Loss over \$0 of personal property damage. The table shows the number of renter-occupied households by county and HUD-defined damage category.

FIGURE 23: FEMA IA RENTERS, LOSS OVER \$0 WITH PERSONAL PROPERTY DAMAGE, BY HUD DAMAGE CATEGORY

Disaster Declaration	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Grand Total
DR-4558	676	105	129	450	220	1,580
DR-4569	108	15	25	204	91	443
DR-4610	861	44	26	55	95	1081

Source: FEMA, Oct 2022

According to the 2021 Federal Register Notice (FRN) outlines, the following damage categories show the number of renter-occupied and owner-occupied units in each category by county.

FIGURE 24: FEMA IA RENTERS, LOSS OVER \$0 WITH PERSONAL PROPERTY DAMAGE, BY HUD DAMAGE CATEGORY

County	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Total
4610	861	44	26	55	95	1081
Lassen	138	2	0	1	2	143
Nevada	166	1	5	6	2	180
Placer	244	1	3	3	6	257
Plumas	227	38	17	45	81	408
Tehama	62	0	0	0	0	62
Trinity	24	2	1	0	4	31

Source: FEMA, Oct 2022

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FIGURE 25: FEMA IA OWNER, LOSS OVER \$0 WITH REAL PROPERTY DAMAGE, BY HUD DAMAGE CATEGORY

County	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Total
4610	793	0	0	0	112	905
Lassen	110	0	0	0	1	111
Nevada	127	0	0	0	14	141
Placer	159	0	0	0	6	165
Plumas	313	0	0	0	82	395
Tehama	46	0	0	0	1	47
Trinity	38	0	0	0	8	46

Source: FEMA, Oct 2022

Small Business Administration Loans

Small Business Administration Housing (SBA) loans are the basic form of federal disaster assistance for homeowners with good credit history and income, and whose private property sustained damage that is not fully covered by insurance. Homeowners and renters whose property was damaged by a presidentially declared disaster are eligible to apply for an SBA low-interest loan. Interest rates on these loans are determined by law and are assigned on a case-by-case basis. Households in DR-4558 impacted counties submitted a total of 4,182 applications, but to date only 478 have been approved. Households in DR-4569 impacted counties submitted 2,029 SBA home loan applications, and only 148 applications have been approved. The figures below give an overview of total applications, approvals, and total SBA Verified Losses by county. Households in DR-4610 impacted counties submitted a total of 259 applications.

FIGURE 26: SBA HOME LOAN APPLICATIONS AND VERIFIED LOSS BY COUNTY

County	Total SBA Applications Submitted	Total SBA Loans Approved	SBA Total Verified Loss
DR-4558			
Butte	718	93	\$59,800,759
Lake	125	1	\$669,641
Lassen	16		\$1,344,401
Mendocino	5		\$674,961

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Monterey	195	12	\$10,663,475
Napa	439	37	\$24,189,721
San Mateo	372	23	\$18,208,033
Santa Clara	354	6	\$8,320,439
Santa Cruz	1,071	222	\$108,605,977
Solano	308	53	\$36,126,752
Stanislaus	9		\$317,779
Trinity	31	3	\$3,708,872
Tulare	50	1	\$4,346,307
Yolo	103	2	\$4,242,321
Total DR-4558	4,182	478	\$296,575,056
DR-4569			
Fresno	295	28	\$22,197,541
Los Angeles	746	24	\$20,834,485
Madera	47	4	\$2,263,948
Mendocino	29	3	\$2,045,137
Napa	135	25	\$12,072,111
San Bernardino	197	5	\$5,230,914
San Diego	263	8	\$6,517,140
Shasta	51	6	\$3,188,147
Siskiyou	97	28	\$12,466,944
Sonoma	169	17	\$13,320,455
Total DR-4569	2,029	148	\$100,136,823
DR-4610			
Lassen	23	2 (\$98,900)	\$ 595,535
Nevada	33	6 (\$591,600)	\$4,170,808

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Placer	24	11 (\$1,282,400)	\$5,598,197
Plumas	157	30 (\$3,677,900)	\$15,789,933
Tehama	4	0	\$ 112,782
Trinity	18	2 (\$367,900)	\$ 1,808,169
Total DR-4610	259	51 (6,018,700)	\$28,075,424

Source: Small Business Administration, January 2022 & August 2022

Summary of Housing Impacts

Based on HUD guidance in the 2020 FRN, the following figure compares Major/Severe FEMA IA properties with a Verified Loss to SBA home loan verified losses to determine an SBA ratio and a total basis for reconstruction. Using this formula, HCD uses the SBA Average Real Property Verified Loss for Severe Properties only, setting the per-unit cost of reconstruction for housing units at \$321,735. This number is well below the cost of a full reconstruction or developing a new unit for either an owner-occupied or renter-occupied unit in the 2020 disaster impacted areas but will serve as the base figure for the HUD-required housing unmet need methodology below.

FIGURE 27: 2020 DISASTERS SBA RATIO

Damage Category	Count of Total Verified Loss	Total SBA Verified Loss	Total FEMA IA Real Property Verified Loss
Major-High	13	\$2,053,381.98	\$307,945.86
Severe	119	\$32,286,571.58	\$18,637,803.25
Average of Severe Properties Only	119	\$321,735.90	\$156,620.20
		SBA Ratio (SBA FVL/FEMA Real Property FVL)	2.05

Source: Small Business Administration: January 2022; FEMA November 2021.

Based on HUD guidance in the 2021 FRN, the following figure compares Major/Severe FEMA IA properties with a Verified Loss to SBA home loan verified losses to determine an SBA ratio and a total basis for reconstruction. Using this formula, HCD uses the SBA Average Real Property Verified Loss for Severe Properties only, setting the per-unit cost of reconstruction for housing units at \$250,435. This number is well below the cost of a full reconstruction or developing a new unit for either an owner-occupied or renter-occupied unit in the 2021 disaster

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impacted areas but will serve as the base figure for the HUD-required housing unmet need methodology below.

FIGURE 28: 2021 DISASTERS SBA RATIO

Damage Category	Count of Total Verified Loss	Total SBA Verified Loss	Total FEMA IA Real Property Verified Loss
Major-High	-		x
Severe	112	\$28,048,736.99	\$20,954,414.17
Average of Severe Properties Only	112	\$250,435.15	\$187,092.98
		SBA Ratio (SBA FVL/FEMA Real Property FVL)	1.33

Source: Small Business Administration, Aug 7, 2022

Using the methodology provided by HUD in the 2020 FRN, the following figure provides the baseline calculation for housing unmet needs in counties impacted by the 2020 disasters in California.

FIGURE 29: 2020 HOUSING UNMET NEED - HUD METHODOLOGY

Damage Category	Owner	Owner	Renter	Renter	Total	Total
	Count	Total Damage	Count	Total Damage	Count	Total Damage
Major-Low		\$0	147	\$47,295,177	147	\$47,295,177
Major-High	62	\$19,947,626	621	\$199,797,991	683	\$219,745,617
Severe	442	\$142,207,266	301	\$96,842,505	743	\$239,049,770
Total	504	\$162,154,891	1,069	\$343,935,672	1,573	\$506,090,564

Using the methodology provided by HUD in the 2021 FRN, the following figure provides the baseline calculation for housing unmet needs in counties impacted by the 2021 disasters in California.

FIGURE 30: 2021 HOUSING UNMET NEED – HUD METHODOLOGY

Damage Category	Owner	Renter	Total
	-	-	-

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-	Count	Total Damage	Count	Total Damage	Count	Total Damage
Major-Low	7	\$30,750	26	\$72,804	33	103,555
Major-High	35	\$258,334	55	\$334,996	90	593,331
Severe	112	\$21,738,849	95	\$958,191	207	22,697,041
Total	154	22,027,933	176	1,365,993	330	23,393,927

CAL FIRE Alternative Methodology

However, the number of properties identified through FEMA IA, which only includes households that registered with FEMA, falls far below the actual number of households impacted by the 2020 disasters. To accurately estimate the owner-occupied housing losses and unmet needs, HCD proposes the following methodology that more accurately reflects the unmet disasters needs.

- Total Destroyed Single Family Residential Structures – 3,847
- Damage multiplier – \$321,735.90 (SBA Ratio)
- Total Damage, Owner-Occupied – \$1,237,714,545

For 2021 disasters, HCD proposes the following methodology to more accurately reflect the unmet disaster needs.

- Total Destroyed Single Family Residential Structures – 1,049
- Damage multiplier – \$250,435
- Total Damage, Owner-Occupied - \$262,732,924

Cost of Reconstruction

The State of California data from CAL FIRE provides further insight into the number of structures destroyed during the 2020 and 2021 fires, but this only covers one side of the cost of reconstruction. The following section shows the actual cost to develop both owner-occupied and multifamily housing units for the 2017 and 2018 disasters funded by CDBG-DR. The cost of construction reflects the rising cost of building materials, labor supply issues, and standard construction costs such as building to the required building codes. When compared to the average total verified loss by SBA, which establishes an average cost based on Severe properties only, of \$321,735 per unit, there continues to be a substantial gap between the SBA approved number and the actual cost of reconstruction in areas impacted by the 2020 disasters.

While the intent of CDBG-DR is to provide gap financing for both homeowners and renters recovering from disaster, many of the OOR applicants are predominantly LMI and have few other resources to assist with reconstruction costs. As shown in the figure below, all of the average costs of reconstruction are at least \$100,000 over the SBA per unit cost.

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FIGURE 31: AVERAGE COST OF RECONSTRUCTION FOR STICK BUILT HOMES FROM SOLUTION 1 OF 2017-2018 HCD CDBG-DR OOR PROGRAM

County	Average Estimated Cost to Reconstruct	2020 Impacted Area
Butte	\$501,503	Y
Lake	\$455,535	Y
Los Angeles	\$546,800	Y
Napa	\$644,137	Y
San Diego	\$578,684	Y
Santa Barbara	\$472,777	
Sonoma	\$655,162	Y
Ventura	\$460,673	

Source: HCD Program Data, April 2022

The Multifamily Housing Program funds the construction of new units to address California’s ongoing housing crisis and helps to address the rental housing shortage exacerbated by disasters. While MHP projects generally rely on multiple funding sources, developer capacity and building costs in rural areas and other rising costs impact the per unit cost for developing MHP units in impacted areas. The figure below shows the average cost per unit proposed for 2017 and 2018 CDBG-DR MHP applicants. Only Yuba County falls below the per unit cost estimated by SBA for the 2020 disaster, all others exceed the average cost for reconstruction.

While HCD does not have multifamily housing program data for the 2021 MID in Plumas County, single family replacement costs are higher throughout the state than what FEMA IA verified losses or even SBA verified losses report. The single family replacement cost is likely to be similar to or a bit higher than that of other mountainous rural counties, like Butte or Lake.

FIGURE 32: CDBG-DR MULTIFAMILY HOUSING PROGRAM COST PER UNIT

Subrecipient	Average Cost Per Unit	2020 Impacted Area
City of Chico	\$480,480	Y
City of Napa	\$494,734	Y
City of Santa Rosa	\$570,157	Y
City of Ventura	\$704,222	
County of Butte	\$394,308	Y

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County of Los Angeles	\$540,815	Y
County of Mendocino	\$472,034	Y
County of Santa Barbara	\$780,573	
County of Sonoma	\$741,805	Y
County of Ventura	\$569,093	
County of Yuba	\$129,802	
City of Redding	\$388,236	Y

Source: HCD Program Data, April 2022

While HCD does not have multifamily housing program data for the 2021 MID in Plumas County, multifamily per unit costs are higher throughout the state than what FEMA IA losses report. The multifamily per unit cost is likely to be similar to or a bit higher than that of other mountainous rural counties, like Butte.

Housing Tenure

A Harvard University study entitled “America’s Rental Housing 2022” posited that renters are uniquely vulnerable to climate change and related disasters because renters receive less assistance after disasters than homeowners. The study cited a 2019 HUD analysis of CDBG-DR-funded recovery examples, which showed that only an eighth of housing activities funding went to affordable rental construction or rental assistance. They also found that renter households often lack the “financial resources to evacuate, information about disaster risks, and adequate insurance coverage.”³⁰ A 2017 survey showed that nearly 40 percent of renters did not have the funds necessary to evacuate in a disaster - more than three times the percent of homeowners.³¹

Every county impacted by the 2020 disasters is an owner-occupied majority county except for Los Angeles. At the same time, renters make up a significant portion of every county’s population, with the most renter-occupied housing units in Butte, Mendocino, Monterey, Santa Clara, Tulare, Fresno, Los Angeles, San Bernadino, and San Diego which all have more than 40 percent renter-occupied housing units.

FIGURE 33: HOUSING TENURE BY DISASTER-IMPACTED COUNTY

County	Owner-Occupied Housing Units	Renter-Occupied Housing Units
DR-4558		

³⁰ “America’s Rental Housing 2022,” JCHS (Joint Center for Housing Studies of Harvard University, 2022), <https://www.jchs.harvard.edu/americas-rental-housing-2022>.

³¹ Ibid.

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Butte	59.0%	41.0%
Lake	66.4%	33.6%
Lassen	67.6%	32.4%
Mendocino	59.9%	40.1%
Monterey	51.0%	49.0%
Napa	64.2%	35.8%
San Mateo	60.2%	39.8%
Santa Clara	56.4%	43.6%
Solano	61.5%	38.5%
Sonoma	61.5%	38.5%
Stanislaus	57.8%	42.2%
Trinity	68.9%	31.1%
Yolo	51.6%	48.4%
DR-4569		
Fresno	53.3%	46.7%
Los Angeles	45.8%	54.2%
Madera	64.1%	35.9%
Mendocino	59.9%	40.1%
Napa	64.2%	35.8%
San Bernardino	59.8%	40.2%
San Diego	53.3%	46.7%
Shasta	64.0%	36.0%
Siskiyou	65.0%	35.0%
Sonoma	61.5%	38.5%
DR-4610		
Lassen	68.6%	31.4%

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Nevada	74.8%	25.2%
Placer	73.4%	26.6%
Plumas	72.9%	27.1%
Tehama	66.0%	34.0%
Trinity	68.5%	31.5%

Source: U.S. Census Bureau 2015-2019 American Community Survey, 5 Year Estimates; Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

Median House Value

After disasters, areas that were affected by or adjacent to disaster incidents often experience a statistically significant decline in housing value.³² The table below established the median housing values in impacted counties before the wildfires of 2020. The pre-2020 median house values for disaster-impacted counties range from around \$200,000 (Lake, Lassen, Tulare, Fresno, Madera, Shasta) to a high range of \$984,000 for Santa Clara and \$1,089,400 for San Mateo County.

After disasters, areas that were affected by or adjacent to disaster incidents often experience a statistically significant decline in housing value. The table below established the median housing values in impacted counties before the wildfires of 2021. The pre-2021 median house values for disaster-impacted counties range from around \$200,000 (Lassen and Tehama) to a high range of \$446,100 for Nevada and \$495,900 for Placer.

FIGURE 34: DISASTER-IMPACTED COUNTIES MEDIAN HOUSE VALUE - OWNER OCCUPIED HOUSING

DR-4558 County	Median Value
Butte	\$271,700
Lake	\$219,400
Lassen	\$203,000
Mendocino	\$377,500
Monterey	\$516,600
Napa	\$635,900

³² Katherine A. Kiel and Victor A. Matheson, "The Effect of Natural Disasters on Housing Prices: An Examination of the Fourmile Canyon Fire," Journal of Forest Economics 33 (December 2018): pp. 1-7, <https://doi.org/10.1016/j.jfe.2018.09.002>.

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San Mateo	\$1,089,400
Santa Clara	\$984,000
Santa Cruz	\$756,600
Solano	\$406,900
Sonoma	\$609,600
Stanislaus	\$291,600
Trinity	\$287,700
Yolo	\$424,900
DR-4569 County	
Fresno	\$255,000
Los Angeles	\$583,200
Madera	\$251,200
Mendocino	\$377,500
Napa	\$635,900
San Bernadino	\$328,200
San Diego	\$563,700
Shasta	\$252,300
Siskiyou	\$198,900
Sonoma	\$609,600
DR-4610	
Lassen	\$207,800
Nevada	\$446,100
Placer	\$495,900
Plumas	\$259,300
Tehama	\$231,500
Trinity	\$285,700

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Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

The median gross rent for disaster impacted counties also exhibits a wide variation, ranging from the lowest point of \$813 gross rent per month in Trinity to \$1,616 gross rent per month in Placer.

FIGURE 35: DISASTER-IMPACTED COUNTIES MEDIAN GROSS RENT

DR-4558 County	Median Gross Rent
Butte	\$1,060
Lake	\$978
Lassen	\$956
Mendocino	\$1,146
Monterey	\$1,495
Napa	\$1,700
San Mateo	\$2,316
Santa Clara	\$2,268
Santa Cruz	\$1,717
Solano	\$1,592
Sonoma	\$1,621
Stanislaus	\$1,155
Trinity	\$799
DR-4569 County	
Fresno	\$998
Los Angeles	\$1,460
Madera	\$1,014
Mendocino	\$1,146
Napa	\$1,700
San Bernadino	\$1,283

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San Diego	\$1,658
Shasta	\$1,039
Siskiyou	\$856
Sonoma	\$1,621
DR-4610	
Lassen	\$928
Nevada	\$1,315
Placer	\$1,616
Plumas	\$944
Tehama	\$972
Trinity	\$813

Source: U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year; Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

2.1.5 Public Housing and Affordable Housing

FIGURE 36: DR-4558 & DR-4569 IMPACTED MULTIFAMILY ASSISTED HOUSING

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	0.00	0.00	0.00	0.00	\$0.00
Minor-High	0.00	0.00	0.00	0.00	\$0.00
Major-Low	0.00	0.00	0.00	0.00	\$0.00
Major-High	0.00	0.00	0.00	0.00	\$0.00
Severe	0.00	0.00	0.00	0.00	\$0.00
Total	0.00	0.00	0.00	0.00	\$0.00

Data Source(s): <https://hudgis-hud.opendata.arcgis.com/datasets/multifamily-properties-assisted/explore>, Accessed August 31, 2022

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FIGURE 37: DR-4610 IMPACTED MULTIFAMILY ASSISTED HOUSING

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	0.00	0.00	0.00	0.00	\$0.00
Minor-High	0.00	0.00	0.00	0.00	\$0.00
Major-Low	0.00	0.00	0.00	0.00	\$0.00
Major-High	0.00	0.00	0.00	0.00	\$0.00
Severe	0.00	0.00	0.00	0.00	\$0.00
Total	0.00	0.00	0.00	0.00	\$0.00

Data Source(s): <https://hudgis-hud.opendata.arcgis.com/datasets/multifamily-properties-assisted/explore>, Accessed August 31, 2022

FIGURE 38: DR-4558 & DR-4569 PUBLIC HOUSING AUTHORITIES DAMAGED

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Butte	1.00	0.00	0.00	\$0.00
Fresno	2.00	0.00	0.00	\$0.00
Lake	1.00	0.00	0.00	\$0.00
Los Angeles	20.00	0.00	0.00	\$0.00
Madera	1.00	0.00	0.00	\$0.00
Mendocino	1.00	0.00	0.00	\$0.00
Monterey	1.00	0.00	0.00	\$0.00
Napa	1.00	0.00	0.00	\$0.00
San Diego	6.00	0.00	0.00	\$0.00
San Mateo	2.00	0.00	0.00	\$0.00
Santa Clara	2.00	0.00	0.00	\$0.00
Santa Cruz	1.00	0.00	0.00	\$0.00
Shasta	2.00	0.00	0.00	\$0.00
Solano	6.00	0.00	0.00	\$0.00
Sonoma	2.00	0.00	0.00	\$0.00

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Stanislaus	2.00	0.00	0.00	\$0.00
Tulare	1.00	0.00	0.00	\$0.00
Yolo	1.00	0.00	0.00	\$0.00
Total	53.00	0.00	0.00	\$0.00

Data Source(s): HUD Public Housing Authorities, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::public-housing-developments-1/explore>

FIGURE 39: DR-4610 PUBLIC HOUSING AUTHORITIES DAMAGED

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Lassen	0.00	0.00	0.00	0.00	\$0.00
Nevada	0.00	0.00	0.00	0.00	\$0.00
Placer	1	0.00	0.00	0.00	\$0.00
Plumas	1	0.00	0.00	0.00	\$0.00
Tehama	0.00	0.00	0.00	0.00	\$0.00
Trinity	0.00	0.00	0.00	0.00	\$0.00

Source: https://www.hud.gov/sites/dfiles/PIH/documents/PHA_Contact_Report_CA.pdf

2.1.6 Fair Housing, Civil Rights Data and Advancing Equity

The Governor’s Office of Planning and Research (OPR) leads long range planning and recovery project implementation for climate resilience and sets equitable recovery goals for state agencies. HCD’s proposed 2020 Action Plan and proposed programs align with these goals outlined by OPR and presents programs that allow disaster impacted communities with different capacity levels to have access to disaster recovery and mitigation programs.

OPR prioritizes creating an equitable recovery, disaster resilience, and climate change mitigation. HCD’s proposed programs will integrate these principles as disasters, disaster recovery, and mitigation from natural hazards continue to impact the State of California and its residents. HUD requires CDBG-DR grantees to focus on vulnerable populations in its recovery and mitigation activities, and HCD and its state partners further that commitment by defining, identifying, and prioritizing vulnerable populations in its recovery and mitigation programs. In the context of climate adaptation, OPR and the Integrated Climate Adaptation and Resiliency Program (ICARP) define climate vulnerability as:

“Climate vulnerability describes the degree to which natural, built, and human systems are at risk of exposure to climate change impacts. Vulnerable communities experience heightened risk and increased sensitivity to climate change and have less capacity and fewer resources to cope with, adapt to, or recover from climate impacts. These disproportionate effects are caused by

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physical (built and environmental), social, political, and/ or economic factor(s), which are exacerbated by climate impacts. These factors include, but are not limited to, race, class, sexual orientation and identification, national origin, and income inequality.³³

To further state identified goals and address climate vulnerability, HCD's proposed 2020 CDBG-DR and Mitigation programs endeavor to align planning efforts at the state and local level, promote housing and infrastructure to reduce climate risk, and develop planning documents that are used throughout government decision-making processes. For the proposed disaster recovery and mitigation programs, HCD will work to align program design to fit the following activities:

- Plan Alignment³⁴ – align recovery and mitigation activities with existing state and local planning documents including:
- General Plans (Housing and Safety Element), Local Hazard Mitigation Plan, Regional Transportation Plan, Community Wildfire Protection Plan, Local Coastal Programs
- Encourage planning efforts beyond jurisdictional boundaries
- Ensure infrastructure projects account for the useful life of critical infrastructure, not just the design life.
- Examples of implementation activities that advance the state's climate resilience/ mitigation and equitable recovery goals include:
- Adopting zoning ordinances that facilitate infill, risk reduction, and sustainable land use and that are consistent across relevant planning documents.
- Rebuilding transportation infrastructure that improves accessibility for non-vehicular transport modes and evacuation routes.
- Building new housing units that are within existing development footprints and walkable to job centers, schools, and public services.
- Using nature-based solutions to reduce community climate risk, protect watershed health and reduce infrastructure costs.
- Hardening structures to reduce climate hazard risk to homes and businesses.
- Coordinating incentives for strategic land assemblage to conserve natural/working lands, restore natural landscape functions, and/or transfer redevelopment to lower-risk locations.
- Supporting workforce development programs in industries critical to forest resource management (e.g., prescribed burning, advanced wood products) and renewable energy.

Affirmatively Further Fair Housing

HCD affirms its commitment to affirmatively furthering fair housing through its CDBG-DR and CDBG-MIT programs. At this point of the Action Plan development, FEMA Individual Assistance

³³ "Defining Vulnerable Communities in the Context of Climate Adaptation" (Governor's Office of Planning and Research, July 2018), <https://opr.ca.gov/docs/20180723-Vulnation>" (Governor's Office of Planning and Research, July 2018), https://opr.ca.gov/docs/20180723-Vulnerable_Communities.pdf.

³⁴ For more on plan alignment, visit OPR's Plan Alignment Clearinghouse.

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does not provide racial and demographic information on applicants, but other analysis of available data on protected classes is contained in the Action Plan document. All program guidelines include details on collecting demographic information of applicants (OOR), service area and demographics (infrastructure), and LMI and any other specific vulnerable populations served by applicants (MHP).

HCD conducted demographic analysis of vulnerable populations and protected classes in the Action Plan, as well as consulting with groups that interact with federally protected classes during the development of the Action Plan. Further analysis prior to program implementation will be included in the program policies and procedures and collected during program implementation.

Disasters exacerbate existing problems in a community, particularly as protected classes have fewer resources to rebound from them. With high housing costs across the state and limited options available, disasters further tighten already stressed housing markets, including many areas impacted by the 2020 disasters. Due to lack of available housing, many disaster survivors, if financially able, move out of the area or state, while others are forced to live in temporary housing or lose their home.³⁵ HCD is committed to Affirmatively Furthering Fair Housing and all disaster recovery and mitigation programs will adhere to its approved Analysis of Impediments to Fair Housing.³⁶ HCD goes beyond the federal requirements for furthering fair housing including implementation of AB 686, and the ongoing work of the Fair Housing and Accountability and Enforcement teams within the Department.³⁷ The following provides an analysis of federal protected classes within the areas impacted by the 2020 disasters, including Most Impacted and Distressed Areas. The Fair Housing Act defines federal protected classes as race, color, national origin, religion, sex, familial status, and disability. HCD is committed to fulfilling its fair housing and civil rights duties for all CDBG-DR and Mitigation activities. Furthermore, fair housing and civil rights obligations, including potential impacts to protected classes, will be taken into consideration in the event that CDBG-DR and Mitigation funds are re-programmed in the future.

This section of the Action Plan includes an assessment of eligible areas for CDBG-DR and Mitigation funds. HCD confirms that none of its proposed programs will have an unjustified discriminatory effect or failure to benefit racial and ethnic minorities in proportion to their communities needs particularly in racially and ethnically concentrated areas of poverty. HCD also provides details on the impacts to persons with disabilities in this section, the outreach and engagement section, and notes how programs will consider persons with disabilities in the proposed program section.

³⁵ "Fixing America's Broken Disaster Housing Recovery System - Part One: Barriers to a Complete and Equitable Recovery" (National Low Income Housing Coalition and Fair Share Housing Center, September 4, 2020), https://nlihc.org/sites/default/files/Fixing-Americas-Broken-Disaster-Housing-Recovery-System_P1.pdf.

³⁶ "Final 2020 Analysis of Impediments to Fair Housing Choice" California Department of Housing and Community Development, June 2020, <https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>

³⁷ More information on HCD's fair housing work is found here: <https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing> and more information on accountability and enforcement work is found here: <https://www.hcd.ca.gov/planning-and-community-development/accountability-and-enforcement>

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This section of the Action Plan, as well as the previous section, provides detail on the racial and ethnic make-up of the population that align with proposed programs based on the best available data sources at the time of this Action Plan's publication. The following section provides data at the lowest level available for the following populations:

- Renters and owners;
- Limited English Proficient populations;
- Persons with disabilities;
- Federally protected classes;
- Indigenous populations;
- Racially and ethnically concentrated areas of poverty; and
- Historically distressed and underserved communities

This section examines data showing protected classes, vulnerable populations, and historically underserved groups in the areas impacted by the 2020 disasters, including maps showing LMI and RECAP areas. The Outreach and Engagement section provides further details on HCD's approach to engage with and communicate opportunities for how protected classes can participate in the planning process, which protected classes may be recipients or beneficiaries of CDBG-DR or Mitigation funding, and HCD's approach to ensuring both outreach and program activities follow both federal and state requirements in terms of accessibility and reasonable accommodation.

The Proposed Use of Funds section outlines HCD's approach to ensure that the all proposed programs addressing barriers that individuals may face when enrolling in and accessing CDBG-DR assistance.

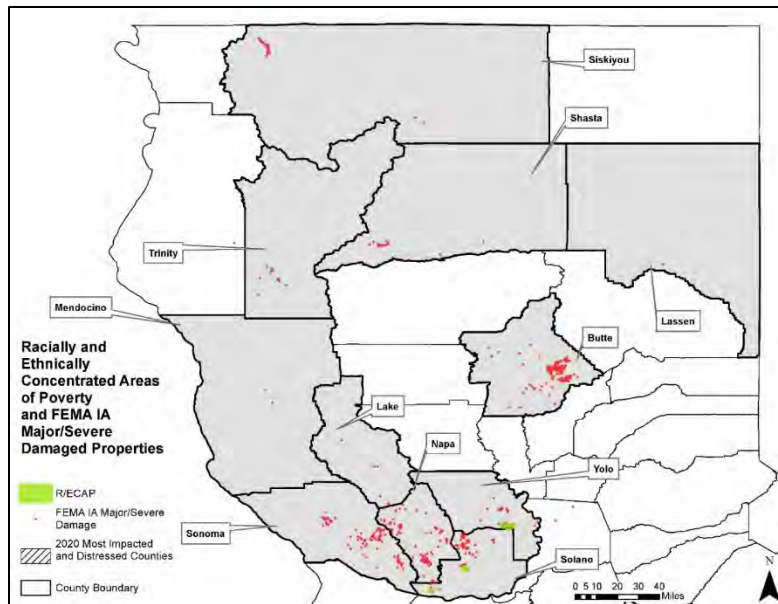
This section provides an analysis of the proximity of natural and environmental hazards to affected populations in the MID area including protected classes, vulnerable populations, and underserved communities

Racially and Ethnically Concentrated Areas of Poverty

HUD defines Racially and Ethnically Concentrated Areas of Poverty (RECAP) as areas that have a non-White population of 50 percent or more with 40 percent or more of the population in poverty, or a poverty rate that is greater than three times the average poverty rate in the area. The following maps show the RECAP areas within the counties impacted by DR-4558, DR-4569, and DR-4610.

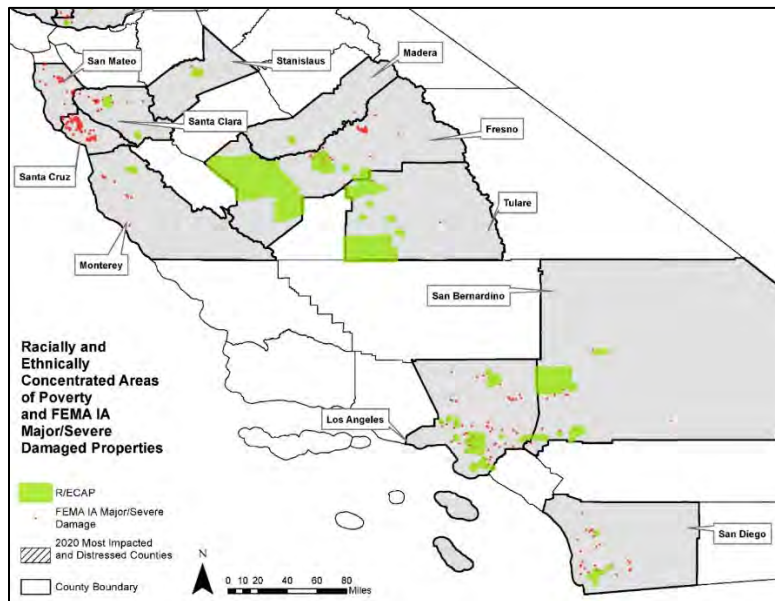
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FIGURE 40: 2020 DISASTERS RECAP AREAS AND FEMA IA MAJOR - SEVERE PROPERTIES - NORTHERN CA



Source: HUD, April 2022; FEMA; U.S. Census Bureau, ESRI

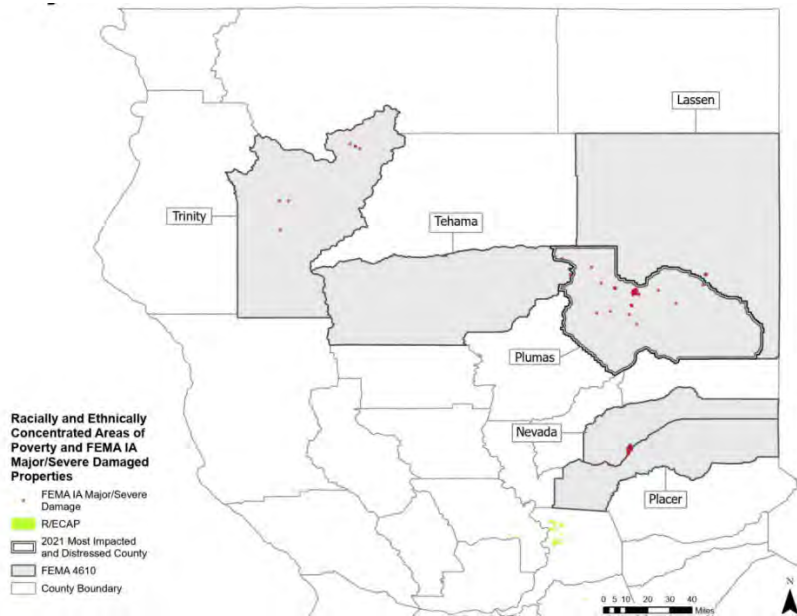
FIGURE 41: 2020 DISASTERS RECAP AREAS AND FEMA IA MAJOR - SEVERE PROPERTIES - SOUTHERN CA



Source: HUD, April 2022; FEMA; U.S. Census Bureau, ESRI

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FIGURE 42: 2021 DISASTERS RECAP AREAS AND FEMA IA MAJOR - SEVERE PROPERTIES



Source: HUD, April 2022; FEMA; U.S. Census Bureau, ESRI

Poverty Rate

People living in poverty are disproportionately affected by disasters. People in poverty are more likely to be exposed to disasters due to a higher likelihood to live in riskier areas – disaster risk and a history of redlining nonwhite, lower income populations to high-risk areas makes homes in riskier areas more accessible and less expensive for people in poverty. People in poverty are also more vulnerable to the long-term economic impacts of disasters, as they lack the resources and wealth to recover quickly from the impacts of disaster.³⁸

Of the counties impacted by DR-4558 and 4569, Butte, Fresno, Madera, Trinity and Tulare have the highest poverty rates, with more than 19 percent of the population living in poverty. San Mateo, Santa Clara, and Napa have the lowest poverty rates, with less than 8 percent of the population living in poverty. In total, the disaster impacted over 3 million people living in poverty across all impacted counties.

FIGURE 43: DR-4558 POVERTY RATE BY COUNTY

County	Total	Below poverty level	Percent below poverty level
Butte	220,091	41,974	19.1%
Lake	63,157	11,753	18.6%

³⁸ Stéphane Hallegatte et al., “From Poverty to Disaster and Back: A Review of the Literature,” *Economics of Disasters and Climate Change* 4, no. 1 (April 24, 2020): pp. 223-247, <https://doi.org/10.1007/s41885-020-00060-5>.

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Lassen	21,010	2,830	13.5%
Mendocino	85,684	15,251	17.8%
Monterey	416,284	54,393	13.1%
Napa	136,360	10,614	7.8%
San Mateo	761,226	51,085	6.7%
Santa Clara	1,896,320	142,534	7.5%
Santa Cruz	262,224	34,419	13.1%
Solano	430,780	41,121	9.5%
Sonoma	492,490	45,418	9.2%
Stanislaus	538,643	81,415	15.1%
Trinity	12,463	2,372	19.0%
Tulare	456,186	108,512	23.8%
Yolo	209,222	39,919	19.1%

Source: U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

FIGURE 44: DR-4569 POVERTY RATE BY COUNTY

County	Total	Below poverty level	Percent below poverty level
Fresno	968,001	218,254	22.5%
Los Angeles	9,928,773	1,480,446	14.9%
Madera	146,837	29,273	19.9%
Mendocino	85,684	15,251	17.8%
Napa	136,360	10,614	7.8%
San Bernadino	2,091,206	333,613	16.0%
San Diego	3,234,305	374,787	11.6%
Shasta	176,274	29,423	16.7%
Siskiyou	43,074	8,102	18.8%
Sonoma	492,490	45,418	9.2%

Source: U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

Of the counties impacted by DR-4610, Tehama and Trinity have the highest poverty rates, with more than 15 percent of the population living in poverty. Nevada and Placer have the lowest poverty rates, with less than 10 percent of the population living in poverty. The MID area, Plumas County, has a poverty rate of 12.5 percent.

FIGURE 45: DR-4610 POVERTY RATE BY COUNTY

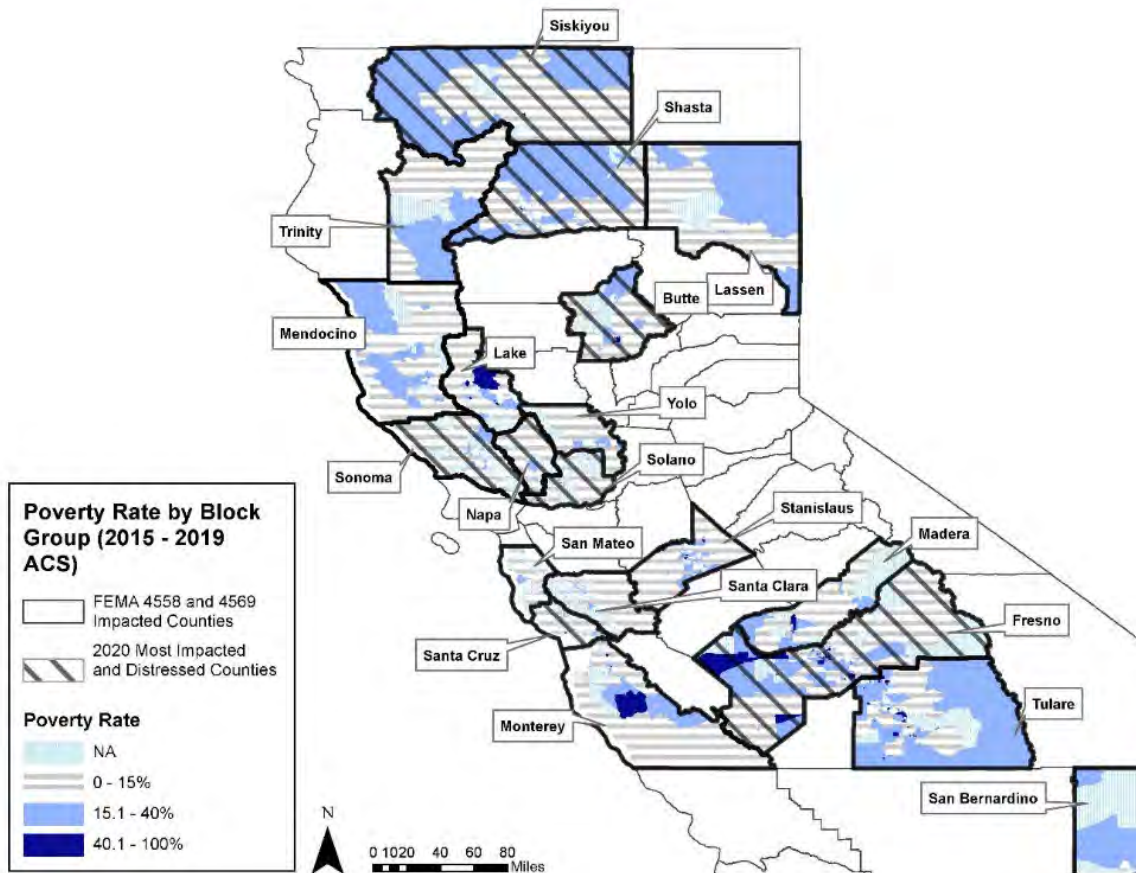
County	Total Population	Below poverty level	Percent below poverty level
Lassen	30,600	4,070	13.3%
Nevada	99,417	9,444	9.5%
Placer	391,799	27,818	7.1%

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Plumas	18,844	2,356	12.5%
Tehama	64,176	12,065	18.8%
Trinity	12,541	2,910	23.2%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

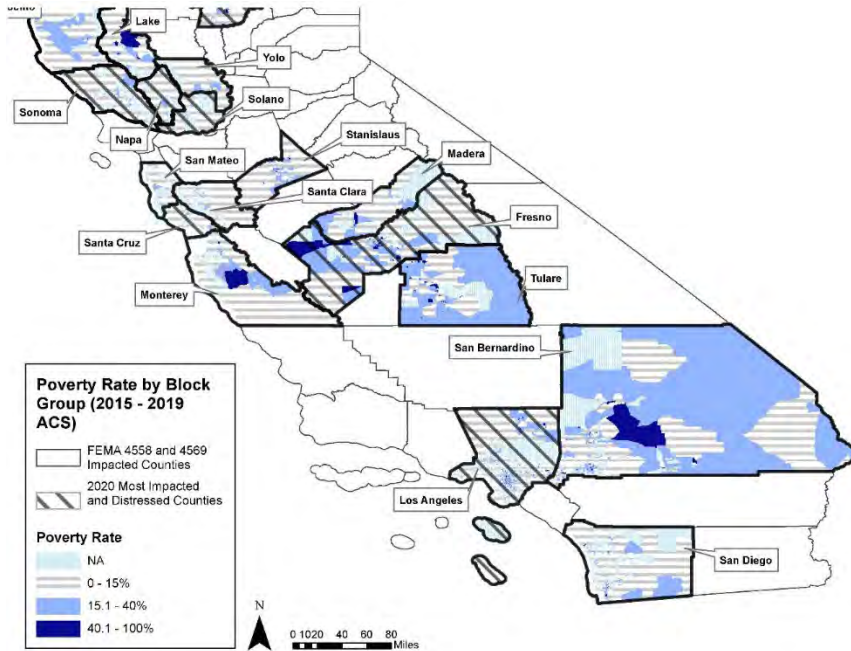
FIGURE 46: 2020 DISASTERS POVERTY RATE MAP - NORTHERN CA



Source: U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

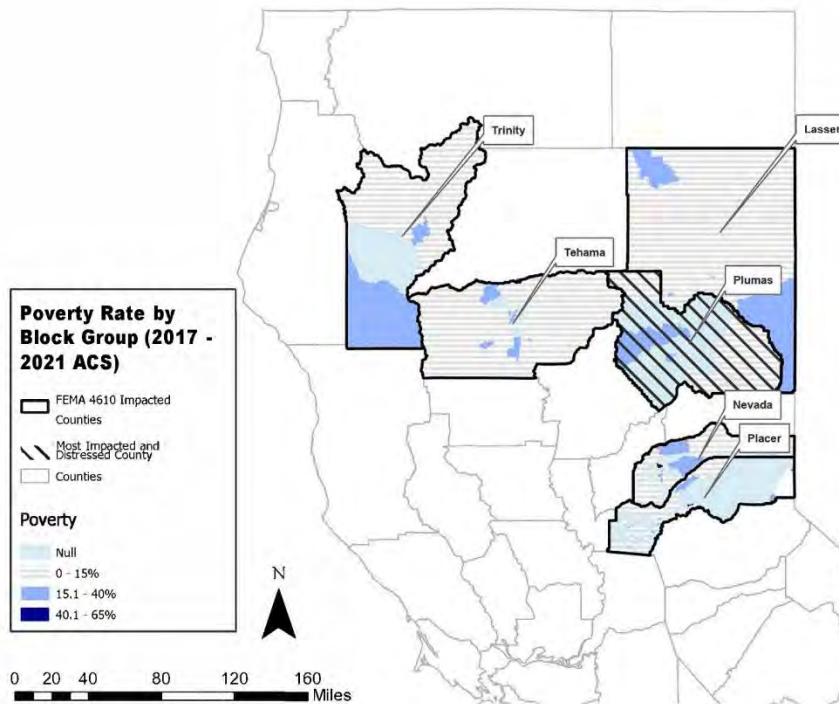
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FIGURE 47: 2020 DISASTERS POVERTY RATE MAP - SOUTHERN CA



Source: U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

FIGURE 48: 2021 DISASTERS POVERTY RATE MAP



Source: U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates

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Demographic Profile of Impacted Counties

The counties impacted by DR-4558, DR-4569, and DR-4610 represent a diverse range of demographics. The geographic spread of the disasters across the State of California results in a wide range of populations, geographies, housing inventories, resources, and challenges. Disaster impacted counties include coastal, interior, mountainous, and desert geographies ranging from the southernmost county of San Diego to the northernmost county of Siskiyou. The counties themselves represent a large range of populations – from low population density, rural counties like Trinity and Plumas, to dense, urban counties like Los Angeles.

The counties also exhibit differing needs regarding populations and access to resources. There is a considerable disparity between the lowest median income counties (Siskiyou at \$45,241) to the highest median income counties (Santa Clara at \$124,055) and a similarly large difference for housing values and gross rent. The following section shows that many of the impacted counties rank among the top 90th percentile of vulnerability in the United States (Fresno, Madera, Tulare), while others fall into the lowest quartile of vulnerability in the country (San Mateo, Santa Clara, Sonoma). Some counties, like Monterey and Tulare, have special challenges like a large limited English proficiency population, or a particularly large, unhoused population like Los Angeles County.

Even the wealthiest, most well-resourced counties have pockets of vulnerability. For instance, Napa County has the lowest poverty rate but still has 6.7 percent of the total population living in poverty. Every county also has a significant portion of people who may have additional challenges or needs in disaster and disaster recovery, including homeless populations, people over age 65, and people living with disabilities.

Impacts on Low- and Moderate-Income (LMI) Populations

Proposed disaster recovery and mitigation activities must prioritize the protection of low-and-moderate income (LMI) persons and meet the overall LMI benefit national objective. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent of the total allocation must be expended to benefit populations within the MID. As defined by HUD, LMI households earn a gross household income of under 80 percent of Area Median Income (AMI), adjusted for family size. For 2020 disasters, Lake, Tulare, and Los Angeles counties contain LMI populations accounting for more than 51 percent of the total county populations. While the rest of the counties are not considered LMI designated counties, they do have significant LMI populations that make up at least 38 percent of the total population. For 2021 disasters, the MID area in Plumas County has an LMI rate of 38 percent.

Social Vulnerability Index (SoVI)

The CDCs social vulnerability index is a ranking system that combines 15 social factors including poverty rate, unemployment rate, income, educational attainment, ages 65 and older, ages 17 or younger, civilians with a disability, single-parent households, minority, speaks

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English “less than well,” multi-unit structure, mobile homes, crowding, no vehicle, and group quarters.³⁹

The CDC social vulnerability index is intended as a tool to help public health officials and local planners better prepare for and respond to disasters by estimating and planning for the needs of vulnerable populations. The SOVI can help counties calculate supply and emergency personnel needs to serve an area, identify areas in need of emergency shelters, plan evacuation methods for those without cars or with mobility issues, and identify who may have special needs regarding evacuation, and identify communities that may have access to greater resources during disaster response and recovery.⁴⁰

The percentile ranking represents the portion of counties nationwide that are equal to or lower in vulnerability to the county. A higher ranking indicates higher vulnerability. For instance, a percentile ranking of .75 means that 75 percent of counties in the country are LESS vulnerable and only 25 percent are more vulnerable.

The most vulnerable disaster impacted counties include Lake, Mendocino, Monterey, Stanislaus, Tulare, Fresno, Los Angeles, Madera, and San Bernardino Counties which are all in the top 70th percentile vulnerability in the country. Tulare, Fresno, and Madera all rank in the top 90th percentile.

FIGURE 49: DR-4558 COUNTIES SOCIAL VULNERABILITY INDEX

County	Overall SoVI® Percentile Ranking
Butte	61.4%
Lake	71.9%
Lassen	40.4%
Mendocino	70.2%
Monterey	73.7%
Napa	33.3%
San Mateo	12.3%
Santa Clara	22.8%
Santa Cruz	45.6%
Solano	43.9%
Sonoma	21.1%
Stanislaus	86.8%

³⁹ “CDC SVI Documentation 2018,” Agency for Toxic Substances and Disease Registry (Centers for Disease Control and Prevention, January 19, 2021), https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2018.html.

⁴⁰ “CDC Social Vulnerability Index,” Agency for Toxic Substances and Disease Registry (Centers for Disease Control and Prevention, October 15, 2020), https://www.atsdr.cdc.gov/placeandhealth/svi/fact_sheet/pdf/SVI_FactSheet_v10152020-H.pdf

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Trinity	49.1%
Tulare	94.7%
Yolo	67.7%

Source: 2018 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index

FIGURE 50: DR-4569 COUNTIES SOCIAL VULNERABILITY INDEX

County	Overall SoVI® Percentile Ranking
Fresno	93.0%
Los Angeles	77.2%
Madera	91.2%
Mendocino	70.2%
Napa	33.3%
San Bernardino	82.5%
San Diego	42.1%
Shasta	47.4%
Siskiyou	50.9%
Sonoma	21.1%

Source: 2018 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index

The percentile ranking represents the portion of counties nationwide that are equal to or lower in vulnerability to the county. A higher ranking indicates higher vulnerability. The most vulnerable disaster impacted counties by DR-4610 include Tehama, Trinity, and Lassen.

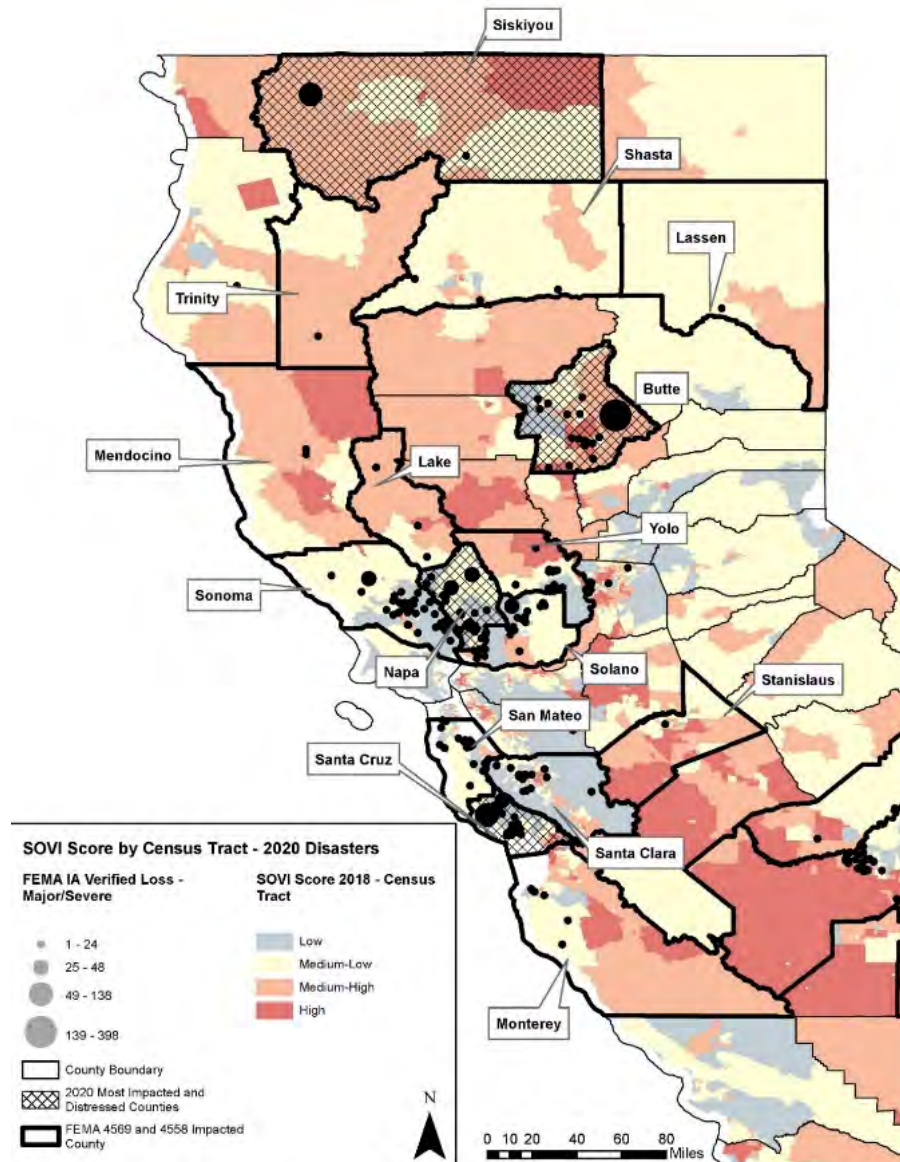
FIGURE 51: DR-4610 COUNTIES SOCIAL VULNERABILITY INDEX

County	Overall SoVI® Percentile Ranking
Lassen	40.35%
Nevada	5.2%
Placer	1.7%
Plumas	14%
Tehama	86%
Trinity	49.1%

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Source: 2018 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index

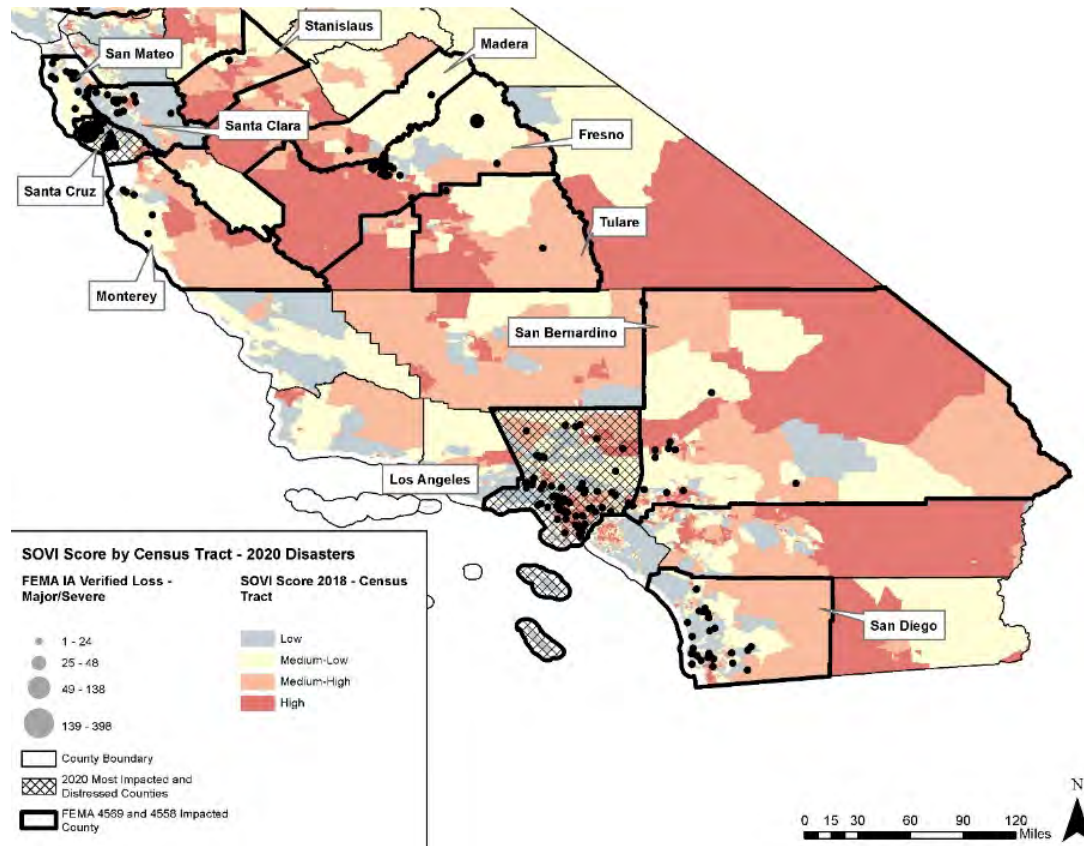
FIGURE 52: 2020 DISASTERS SOVI RANKING AND FEMA IA MAJOR/SEVERE PROPERTIES - NORTHERN CA



Source: 2018 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index, ESRI

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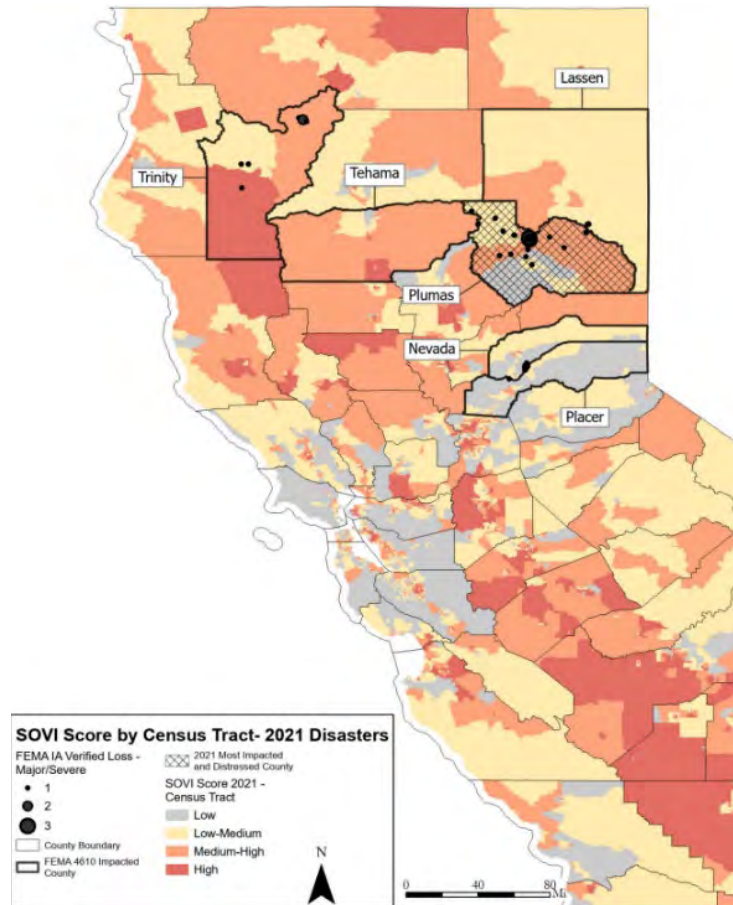
FIGURE 53: 2020 DISASTERS SOVI RANKING AND FEMA IA MAJOR/SEVERE PROPERTIES - SOUTHERN CA



Source: 2018 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index, ESRI

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FIGURE 54: 2021 DISASTERS SOVI RANKING AND FEMA IA MAJOR/SEVERE PROPERTIES



Source: 2018 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index, ESRI

HUD Income Limits

Proposed disaster recovery and mitigation programs and projects must prioritize the protection of low-and-moderate income (LMI) persons and meet the overall LMI benefit national objective. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent must be expended to benefit the MID. As defined by HUD, LMI households earn a gross household income of under 80 percent of Area Median Income (AMI), adjusted for family size.⁴¹ Statewide

⁴¹ U.S. Department of Housing and Urban Development Office of Planning and Community Development. Laws and Regulations: Low- and Moderate-Income Definitions under the CDBG Program. Available at: <https://www.huduser.gov/portal/datasets/cdbg-income-limits.html>

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median income as of 2021 in California is \$90,100; a household of four is considered LMI if earning a gross income of \$64,850 or less⁴².

FIGURE 55: STATEWIDE INCOME LIMITS

Household Size	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Extremely Low Income (30%)	\$18,900	\$21,600	\$24,350	\$27,050	\$29,200	\$31,350	\$33,500	\$35,700
Low Income (50%)	\$31,550	\$36,050	\$40,550	\$45,050	\$48,650	\$52,250	\$55,850	\$59,450
Low Income (80%)	\$50,450	\$57,650	\$64,850	\$72,100	\$77,850	\$83,600	\$89,400	\$95,150

Source: 2021 HUD Income Limits

The following figures provide a breakdown of the 2021 LMI HUD income limits by counties impacted by DR-4558 and DR-4569.

FIGURE 56: HUD INCOME LIMITS IN THE DR-4558 COUNTIES

County	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Butte	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Fresno	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Lake	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Lassen	\$40,450	\$46,200	\$52,000	\$57,750	\$62,400	\$67,000	\$71,650	\$76,250
Los Angeles	\$66,250	\$75,700	\$85,150	\$94,600	\$102,200	\$109,750	\$117,350	\$124,900
Madera	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Mendocino	\$40,500	\$46,300	\$52,100	\$57,850	\$62,500	\$67,150	\$71,750	\$76,400
Monterey	\$56,950	\$65,100	\$73,250	\$81,350	\$87,900	\$94,400	\$100,900	\$107,400
Napa	\$63,050	\$72,050	\$81,050	\$90,050	\$97,300	\$104,500	\$111,700	\$118,900
San Bernadino	\$44,250	\$50,600	\$56,900	\$63,200	\$68,300	\$73,350	\$78,400	\$83,450
San Diego	\$67,900	\$77,600	\$87,300	\$97,000	\$104,800	\$112,550	\$120,300	\$128,050
San Mateo	\$102,450	\$117,100	\$131,750	\$146,350	\$158,100	\$169,800	\$181,500	\$193,200
Santa Clara	\$82,450	\$94,200	\$106,000	\$117,750	\$127,200	\$136,600	\$146,050	\$155,450
Santa Cruz	\$78,050	\$89,200	\$100,350	\$111,500	\$120,450	\$129,350	\$138,300	\$147,200
Shasta	\$39,800	\$45,450	\$51,150	\$56,800	\$61,350	\$65,900	\$70,450	\$5,000
Siskiyou	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Solano	\$54,350	\$62,100	\$69,850	\$77,600	\$83,850	\$90,050	\$96,250	\$102,450
Sonoma	\$65,150	\$74,450	\$83,750	\$93,050	\$100,500	\$107,950	\$115,400	\$122,850

⁴² "§ 6932. 2021 Income Limits," California Code of Regulations (Thomson Reuters Westlaw, 2021), <https://www.fire.ca.gov/incidents/2021/7/13/dixie-fire/>.

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Stanislaus	\$39,950	\$45,650	\$51,350	\$57,050	\$61,650	\$66,200	\$70,750	\$75,350
Trinity	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Tulare	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Yolo	\$49,650	\$56,750	\$63,850	\$70,900	\$76,600	\$82,250	\$87,950	\$93,600

Source: 2021 HUD Income Limits

FIGURE 57: HUD INCOME LIMITS IN THE DR-4569 COUNTIES

County	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Fresno	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Los Angeles	\$66,250	\$75,700	\$85,150	\$94,600	\$102,200	\$109,750	\$117,350	\$124,900
Madera	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Mendocino	\$40,500	\$46,300	\$52,100	\$57,850	\$62,500	\$67,150	\$71,750	\$76,400
Napa	\$63,050	\$72,050	\$81,050	\$90,050	\$97,300	\$104,500	\$111,700	\$118,900
San Bernadino	\$44,250	\$50,600	\$56,900	\$63,200	\$68,300	\$73,350	\$78,400	\$83,450
San Diego	\$67,900	\$77,600	\$87,300	\$97,000	\$104,800	\$112,550	\$120,300	\$128,050
Shasta	\$39,800	\$45,450	\$51,150	\$56,800	\$61,350	\$65,900	\$70,450	\$75,000
Siskiyou	\$39,050	\$44,600	\$50,200	\$55,750	\$60,250	\$64,700	\$69,150	\$73,600
Sonoma	\$65,150	\$74,450	\$83,750	\$93,050	\$100,500	\$107,950	\$115,400	\$122,850

Source: 2021 HUD Income Limits

The following table provides a breakdown of the 2021 LMI HUD income limits by counties impacted by DR-4610.

FIGURE 58: HUD INCOME LIMITS IN THE DR-4610 COUNTIES

County	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Lassen	45,000	51,400	57,850	64,250	69,400	74,550	79,700	84,850
Nevada	55,100	63,000	70,850	78,700	85,000	91,300	97,600	103,900
Placer	56,750	64,850	72,950	81,050	87,550	94,050	100,550	107,000
Plumas	45,750	52,300	58,850	65,350	70,600	75,850	81,050	86,300
Tehama	43,650	49,850	56,100	62,300	67,300	72,300	77,300	82,250
Trinity	43,650	49,850	56,100	62,300	67,300	72,300	77,300	82,250

Source: 2021 HUD Income Limits

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Impact on Vulnerable Populations

RACE

Race is a protected class under the Fair Housing Act. As such, HCD assesses all programs to evaluate the equity and impact on protected classes. Disaster impacts vulnerable populations disproportionately due to “housing patterns, building construction, community isolation and cultural insensitivity.”⁴³ A 2021 New York Times article entitled “Why Does Disaster Aid Often Favor White People” found that that white disaster victims often receive more disaster aid from FEMA than their Black neighbors. The report found that white residents of counties with significant disaster damage that received FEMA assistance had their wealth increase years later (five times as much, on average, as white residents who had not experienced FEMA assistance) while Black residents maintained less wealth in the same time period.⁴⁴

The following table shows the size and percentage of Hispanic communities in disaster impacted counties. The data indicates that two impacted counties (Lassen and Tehama) have Hispanic or Latino populations that make up about 20 percent of the total county population.

FIGURE 59: DR-4610 PERCENT HISPANIC OR LATINO POPULATION

County	Total Population	Hispanic or Latino	Percent Hispanic
Lassen	30,600	5,893	19.3%
Nevada	99,417	9,480	9.5%
Placer	391,799	55,932	14.3%
Plumas	18,844	1,749	9.3%
Tehama	64,176	16,435	25.6%
Trinity	12,541	933	7.4%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

ETHNICITY

A 2020 research study posits that Hispanic or Latino communities need special consideration in disaster planning processes and recovery in order to achieve equitable outcomes. The study found that vulnerable people were often not included in the planning process and suffered from the “slow violence” of emergency plans that overlooked their needs.⁴⁵ Examples include emergency information that is not available in Spanish and significant lack of insurance coverage available or affordable to immigrants. California has a large population of undocumented Latino/a and Indigenous immigrants, last estimated at 2.6 million residents. The

⁴³ Fothergill, Maestas, and Darlington. “Race, ethnicity and disasters in the United States: a review of the literature.” *Disasters* vol. 23,2 (1999): 156-73. doi:10.1111/1467-7717.00111

⁴⁴ Christopher Flavelle, “Why Does Disaster Aid Often Favor White People?,” *The New York Times*, June 7, 2021, <https://www.nytimes.com/2021/06/07/climate/FEMA-race-climate.html>.

⁴⁵ Méndez, Michael et al. “The (in)visible victims of disaster: Understanding the vulnerability of undocumented Latino/a and indigenous immigrants.” *Geoforum; journal of physical, human, and regional geosciences* vol. 116 (2020): 50-62. doi:10.1016/j.geoforum.2020.07.007

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study also found that immigrants may be afraid to seek assistance after disasters due to fears of detention and deportation⁴⁶. The majority of the DR-4558 and DR-4569 impacted counties have Hispanic or Latino populations that make up at least 20 percent of the total county population. In Monterey, Tulare, Fresno, Madera, and San Bernadino, the majority of the population is Hispanic or Latino. DR-4610 counties have lower percentages of Hispanic/Latino residents, and only 9.3 percent of MID residents are Hispanic/Latino.

HOUSEHOLDS WITH CHILDREN

The CDC Social Vulnerability Index uses ‘household composition with dependent children under 18’ as a vulnerability factor because “children and elders are the most vulnerable groups in disaster events.”⁴⁷ Children specifically lack the resources to cope with and effectively recover from disasters without adult help. At the same time, children are rarely incorporated into disaster planning exercises, although they are the most likely to suffer PTSD and lingering mental health effects from disasters. Furthermore, households with children under 18 are more likely to require assistance with finances, transportation, medical care, and childcare during the disaster event and recovery⁴⁸. Within the DR-4558 and DR-4569 disaster impacted counties Trinity County has the smallest number of households with children, at 17.9 percent, while in Fresno, Madera, and Tulare counties, at least 40 percent of households include children.

POPULATION WITH DISABILITIES

People with disabilities are disproportionately impacted by disasters, as disruptions in support systems and medical care exacerbate challenges people reckon with as part of regular life. Due to impaired or limited physical or cognitive abilities, individuals may be unable to evacuate safely or easily, create or maintain a preparedness plan, advocate fully for their needs, or seek out necessary care while displaced. After disasters, people with disabilities face significant barriers in finding and securing appropriate housing, transportation, employment, physical and mental health services, and other supports critical to long-term recovery.⁴⁹

The American Community Survey measures six disability types:

- Hearing difficulty, deaf or having serious difficulty hearing.
- Vision difficulty, blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive difficulty because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory difficulty, having serious difficulty walking or climbing stairs.
- Self-care difficulty, having difficulty bathing or dressing.

⁴⁶ Ibid.

⁴⁷ Centers for Disease Control and Prevention, “CDC SVI Documentation 2018.”

⁴⁸ Flanagan, Barry E., Edward W. Gregory, Elaine J Hallisey, Janet L. Heitgerd, and Brian Lewis. “A Social Vulnerability Index for Disaster Management.” *Journal of Homeland Security and Emergency Management* 8, no. 1 (2011). <https://doi.org/10.2202/1547-7355.1792>.

⁴⁹ Stough, L.M., Sharp, A.N., Resch, J.A., Decker, C. and Wilker, N. (2016), Barriers to the long-term recovery of individuals with disabilities following a disaster. *Disasters*, 40: 387-410. <https://doi.org/10.1111/disa.12161>

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- Independent living difficulty, because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping.⁵⁰

Within the DR-4558 and DR-4569 disaster impacted counties, Lake, Lassen, Trinity, Shasta, and Siskiyou counties have the highest percent population with a disability, each with a population of more than 16 percent. Within the DR-4610 counties, Lassen, Plumas, Tehama, and Trinity have a disability rate higher than 16 percent.

All CDBG-DR programs have an obligation to comply with relevant federal laws that prohibit discrimination on the basis of disability and to require physical accessibility and the provision/allowance of reasonable accommodations and reasonable modifications, including the federal Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. The following tables show the percent and number of the population with a disability in each disaster impacted county.

FIGURE 60: DR-4610 POPULATION WITH A DISABILITY

County	Total Population	With Disability	Percent with Disability
Lassen	30,600	3,473	16.5%
Nevada	99,417	13,719	13.9%
Placer	391,799	40,920	10.5%
Plumas	18,844	3,131	16.8%
Tehama	64,176	12,118	19.0%
Trinity	12,541	2,180	17.7%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

POPULATION 65 AND OLDER

Senior households face special challenges and are disproportionately affected by disasters. Challenges for seniors may include owner-occupied households non-existent or inadequate insurance (due to a lack of resources, or because the mortgage has been paid off), individuals unable to access medication or care when medical systems are disrupted, or mobility or cognitive impairments that hinder safe evacuations, issues which may limit ability to evacuate. Data shows the percentage of population over 65 in disaster impacted counties. Mendocino, Trinity, Shasta and Siskiyou counties each have elderly populations that make up more than 20 percent of the county population.⁵¹

⁵⁰ U.S. Census Bureau, “How Disability Data are Collected from the American Community Survey,” <https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html>.

⁵¹ U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

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Senior households face special challenges and are disproportionately affected by disasters. Challenges for seniors may include owner-occupied households non-existent or inadequate insurance (due to a lack of resources, or because the mortgage has been paid off), individuals unable to access medication or care when medical systems are disrupted, or mobility or cognitive impairments that hinder safe evacuations, issues while may limit ability to evacuate. The following table shows the percentage of population over 65 in disaster impacted counties. Nevada, Plumas, and Trinity counties each have elderly populations that make up more than 20 percent of the county population.

FIGURE 61: DR- 4610 ELDERLY POPULATION

County	Total Population	Sum of 65 and older	Percent 65 and older
Lassen	30,600	4,421	14.4%
Nevada	99,417	27,250	27.4%
Placer	391,799	76,618	19.6%
Plumas	18,844	5,217	27.7%
Tehama	64,176	12,707	19.8%
Trinity	12,541	3,507	28%

Source: U.S. Census Bureau, 2016 - 2020 American Community Survey, 5-Year Estimates

POPULATION WITH LIMITED ENGLISH PROFICIENCY

The Civil Rights Act of 1964 prohibits discrimination on the basis of national origin and requires that government entities ensure that persons with Limited English Proficiency (LEP) have access to the same benefits, services, and information as English-speaking residents. As such, disaster preparedness and recovery must consider and plan for those who need translators and translated materials. Monterey, Tulare, Fresno, Los Angeles, and Madera all have a percent population of people who speak English less than well that is over 10 percent of the population. Because disaster preparedness and recovery must include the need for translators and translated materials, it is important to assess which languages are commonly spoken in impacted areas. In every disaster impacted county, the majority of non-English speakers speak Spanish. A few of the larger counties also include a significant number of Indo-European and Asian or Pacific Island speakers as well.⁵² The DR-4610 MID's LEP population is less than 10 percent.

Housing Impact

COST-BURDENED HOUSEHOLDS

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as “cost-burdened.” Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation, and childcare, and

⁵² U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

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often lack adequate savings to spend on evacuation, shelter, or recovery from disaster scenarios.⁵³ Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. For 2020 disasters, every disaster impacted county population is at least 43 percent cost-burdened. Butte, Monterey, Napa, Santa Cruz, Solano, Sonoma, Stanislaus, Trinity, Tulare, Yolo, Fresno, Los Angeles, Napa, San Bernadino, San Diego, Shasta, and Sonoma County all have populations that are at least 50 percent cost-burdened. For 2021 disasters, more than 50 percent of residents in Nevada, Placer, Tehama, and Trinity counties are cost-burdened, but 36.8 percent of residents in the MID (Plumas County) are cost-burdened.

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as “cost-burdened.” Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation, and childcare, and often lack adequate savings to spend on evacuation, shelter, or recovery from disaster scenarios. Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. The table below shows the number of renters households and percentage of renters that pay more than 30 percent of their income in housing cost in impacted counties of Lassen, Nevada, Placer, Plumas, Tehama, and Trinity.

FIGURE 62: DR-4610 COST-BURDENED RENTERS HOUSEHOLDS

County	Renter Occupied Housing Units	Number of Renters paying 30 percent or more in housing costs	Percent of Renters paying 30 percent or more in housing costs
Lassen	2,881	1,197	36.4%
Nevada	10,312	5,410	57%
Placer	38,820	18,977	51.8%
Plumas	2,255	938	36.8%
Tehama	8,379	4,281	57.7%
Trinity	1855	900	54.1%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

PERSONS EXPERIENCING HOMELESSNESS

Persons experiencing homelessness are especially vulnerable during disasters and require additional support during disaster recovery. Lack of permanent addresses or limited digital communications access can make locating and evacuating unhoused people very difficult, and the trauma of a major disaster can amplify any existing physical or mental health challenges.

⁵³ “Housing and Transportation costs,” Department of Housing and Community Development, April 28, 2022, <https://www.hcd.ca.gov/policy-and-research/intersectional-policy-work/housing-and-transportation>

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For people already struggling with housing and resource instability, a disaster and subsequent displacement can be disproportionately destructive.

The tables below illustrate a one-night count of unhoused people in each county. These counts measured the number of sheltered and unsheltered persons experiencing homelessness in each of the continuum of care regions, some of which are shared by multiple counties. Some of the counties share the same continuum of care regions and resources. Results of the one-night count ranged from 261 persons (Colusa, Glenn, Trinity Counties CoC) to 63,706 persons (Los Angeles City and County CoC). Additional data from the same point-in time count reveals that the majority individuals seeking shelter after disasters in impacted CoCs come from unhoused populations.⁵⁴

The table below illustrates a one-night count of unhoused people in each DR-4610 county. These counts measured the number of sheltered and unsheltered persons experiencing homelessness in each of the continuum of care regions, some of which are shared by multiple counties. Some of the counties share the same continuum of care regions and resources.

FIGURE 63: DR-4610 POINT-IN TIME HOMELESS POPULATION IN 2020

Impacted County	Continuum of Care Name	CoC Number	2020 Homeless Count
Lassen	Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC	CA-516	1,529
Nevada	Nevada County CoC	CA-531	387
Placer	Roseville, Rocklin/Placer County CoC	CA-515	744
Plumas	Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC	CA-516	1,529
Tehama	Tehama County CoC	CA-527	300
Trinity	Colusa, Glenn, Trinity Counties CoC	CA-523	261

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Point-in Time County *The 2020 count took place in January 2020. This year was chosen because it counted the unsheltered population while the 2021 counts likely undercounted due to COVID-19 limitation.

Additional data from the same point-in time count reveals that the majority of individuals seeking shelter after disasters in impacted CoCs come from unhoused populations.

FIGURE 64: DR-4610 POINT-IN TIME HOMELESS POPULATION BY SHELTER STATUS 2020

Impacted County	Continuum of Care Name	Emergency Shelter	Transitional Housing	Unsheltered
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⁵⁴ Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Point-in Time County

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Lassen	Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC	436	189	1,023
Nevada	Nevada County CoC	87	12	251
Placer	Roseville, Rocklin/Placer County CoC	242	166	405
Plumas	Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC	436	189	1,023
Tehama	Tehama County CoC	24	38	215
Trinity	Colusa, Glenn, Trinity Counties CoC	61	58	150

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Point-in Time County *The 2020 count took place in January 2020. This year was chosen because it counted the unsheltered population while the 2021 counts likely undercounted due to COVID-19 limitation.

Proposed disaster recovery and mitigation activities must prioritize the protection of low-and-moderate income (LMI) persons and meet the overall LMI benefit national objective. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent of the total allocation must be expended to benefit populations within the MID. As defined by HUD, LMI households earn a gross household income of under 80 percent of Area Median Income (AMI), adjusted for family size. Tehama and Trinity counties contain LMI populations accounting for about 50 percent of the total county populations.

FIGURE 65: DR-4610 LMI POPULATION DATA BY COUNTY

County	Total 2015 Low-to-Moderate Income Persons	Total 2015 Low-to-moderate Universe Population	2011-2015 Percentage Low-to-Moderate Income Estimate
Lassen	8,360	21,730	40.54%
Nevada	38,295	97,410	40.33%
Placer	113,914	362,205	34.48%
Plumas	7,575	18,565	38.58%
Tehama	4,770	8,625	49.75%
Trinity	6,365	13,065	50.67%

Source: HUD 2021 LMI

Addressing homelessness is an ongoing challenge for communities across California, but the state commits significant state resources for local governments, including areas impacted by the 2020 disasters. The Governor’s 2021-2022 budget proposed \$7.2 billion for nearly 30

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homelessness related programs across state departments.⁵⁵ HCD is a key agency in implementing these programs from federally funded programs to newer programs like Project Roomkey (\$1.4 billion), designed to rapidly expand housing for persons experiencing homelessness who are at high-risk for COVID-19 and other communicable diseases.⁵⁶ Other HCD program resources available for persons experiencing homelessness include⁵⁷

Emergency Solutions Grant Program - Grants to address homelessness by providing funding for supportive services, emergency shelter/transitional housing, homelessness prevention assistance, and permanent housing.

HOME American Rescue Plan - Assists individuals or households at risk of, or experiencing homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter.

Housing for a Healthy California - Funds the creation and support of new and existing permanent supportive housing for people who are experiencing chronic homelessness or are homeless and high-cost health users.

Housing Navigators Program - Provides funds to counties for the support of housing navigators to help young adults aged 18 to 21 years secure and maintain housing, with priority given to young adults in the foster care system.

Multifamily Housing Program – State program providing low-interest, long-term deferred-payment loans for new construction, rehabilitation, and preservation of permanent rental housing for lower-income households.

No Place Like Home - Funds the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or at risk of chronic homelessness.

Permanent Local Housing Allocation (PLHA) - Grant funding available to eligible local governments in California for housing-related projects and programs that assist in addressing the unmet housing needs of their local communities.

Pet Assistance and Support (PAS) Program - Grant funds to homeless shelters for pet shelter, food and basic veterinary services for pets owned by individuals experiencing homelessness.

Transitional Housing Program - Funds to help young adults 18-24 years secure and maintain housing, with priority given to those formerly in the foster care or probation systems.

⁵⁵ "The Governor's Homelessness Plan," California Legislative Analyst Office, February 9, 2022 <https://lao.ca.gov/Publications/Report/4521>

⁵⁶ "Homekey: Bringing California Home," California Department of Housing and Community Development, April 28, 2022, <https://www.hcd.ca.gov/grants-and-funding/homekey>

⁵⁷ "Programs: Active, Homelessness," California Department of Housing and Community Development, April 28, 2022 <https://www.hcd.ca.gov/grants-and-funding/programs-active>

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Veterans Housing and Homelessness Prevention Program - Long-term loans for development or preservation of rental housing for very low- and low-income veterans and their families.

While shelter, addressing homelessness, supportive housing, and other efforts remain needs for areas impacted by the 2020 disasters, HCD proposes to utilize its proposed Multifamily Housing Program to create long-term housing solutions to add units for low-income individuals in disaster impacted areas. The Outreach and Engagement section of this document provides additional detail on consultations with renters and homeowners displaced by the 2020 disasters.

MOBILE HOUSING UNITS

Mobile homes are more vulnerable to disasters than permanent residential structures due to structural deficiencies and an increased likelihood of being in exposed, higher-risk areas. A 2020 case study of mobile home parks in flood-affected communities found that mobile home parks faced unique disaster vulnerabilities due to a high concentration socioeconomic instability, stigmatization by local government and community, and exclusion or disenfranchisement during post disaster recovery due to that stigmatization.⁵⁸

Mobile homes account for 10 percent or more of the total housing stock in Butte, Lake, Lassen, Trinity, Shasta, and Siskiyou counties and likely reflect a substantial portion of homes damaged by the 2020 wildfires.

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The tables below show the mobile home percentage of the residential housing stock of each disaster impacted county. Mobile homes account for 10 percent or more of the total housing stock in Lassen, Plumas, Tehama, and Trinity counties and likely reflect a substantial portion of homes damaged by the 2021 wildfires.

FIGURE 66: DR-4610 PERCENT HOUSING MOBILE HOMES

County	Percent Housing Units Mobile Homes
Lassen	12.9%
Nevada	6.1%
Placer	2.7%

⁵⁸ Andrew Rumbach, Esther Sullivan, and Carrie Makarewicz, "Mobile Home Parks and Disasters: Understanding Risk to the Third Housing Type in the United States: Natural Hazards Review: Vol 21, No 2," Natural Hazards Review (American Society of Civil Engineers, January 21, 2020), [https://ascelibrary.org/doi/abs/10.1061/\(ASCE\)NH.1527-6996.0000357](https://ascelibrary.org/doi/abs/10.1061/(ASCE)NH.1527-6996.0000357).

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Plumas	12.0%
Tehama	19.3%
Trinity	19.9%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

SOCIAL AND PUBLIC SERVICE PROGRAMS

Disasters exacerbate preexisting conditions in communities, and disproportionately affect vulnerable populations. Deaths, injuries, and the loss of property or possessions due to disasters can magnify ongoing health and mental health issues and create additional challenges in a household and community’s recovery process. Social service programs work to address these challenges by identifying vulnerable communities, providing financial and logistical support, and promoting physical and mental wellness in communities throughout California. Social service professionals act as advocates and service providers to underserved populations, and connect survivors with critical supplies and services before, during, and after a disaster. Social services directly mitigate the impacts of disasters on vulnerable populations, and help communities recover stronger and faster. The following programs provide these services to impacted communities across California, from the local to state level:

CASE MANAGEMENT

Disaster Case Management is provided by local DCMP agencies throughout the state in the disaster impacted counties. In more rural areas, multiple counties may be served by the same organization. For instance, Northern Valley Catholic Social Services serves Trinity, Lassen, Butte, Shasta, and Siskiyou. In previous disasters, the state was told what a significant effort it is to get people’s homes and lives back together and that both the counties and the cities desperately need help building capacity.

Catholic Charities of California, an organization that coordinates the Disaster Case Management Program, provided the following table of case management activities and metrics through February 9, 2022. The table shows that while disaster 4558 had more survivors, disaster 4569 had a higher caseload. 4558 closed about four times more cases which were majority programmatic.

FIGURE 67: CASE MANAGEMENT CASELOADS AND CLOSURES

Metric	2020 DR-4558	2020 DR-4569	2020 Unassigned	2021 DR-4610	2021 Unassigned
Survivors	1431	907	620	86	239
Caseload	240	506	70	62	93
Waitlist	163	121	189	22	144
Referrals					

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Number of Referrals Made	265	223	27	11	2
Value	\$634,747	\$303,250	\$34,058	\$7,828	\$50
Closures					
Total Survivors Closed	1,027	287	361	2	2

Catholic Charities of California, an organization that coordinates the Disaster Case Management Program, provided the following table of case management activities and metrics through May 31, 2022. The table shows that DR-4610 had more survivors than caseload.

The below tables regarding vulnerabilities of case management clients shows that DR-4558 saw many cases in which people were uninsured/underinsured or dealing with housing insecurity, poverty, or unemployment. DR-4569 saw many cases in which people spoke limited English, were uninsured/underinsured, or dealing with unemployment or emotional distress. Disaster DR-4569 had many more clients who spoke limited English (18 percent) than disaster 4558 (1 percent).

FIGURE 68: CASE MANAGEMENT VULNERABILITIES

Vulnerabilities	DR-4558 Number	DR-4558 Percent	DR-4569 Number	DR-4569 Percent	DR-4610 Number	DR-4610 Percent
Uninsured/Underinsured	390	27%	147	16%	37	55%
Housing Insecurity	304	21%	105	12%	30	45%
Poverty	204	14%	101	11%	28	42%
Unemployment	203	14%	146	16%	17	25%
Urgent Basic Needs	186	13%	71	8%	22	33%
Elderly 65+	167	12%	121	13%	21	31%
Emotional Distress	163	11%	145	16%	37	55%
Disabilities	151	11%	48	5%	19	x%
Isolated	112	8%	24	3%	14	21%
Functional Needs (AFN)	104	7%	29	3%	7	10%

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Single Head of Household	60	4%	54	6%	7	10%
Safety Risk	55	4%	16	2%	3	4%
Limited Information Access	51	4%	3	0%	13	19%
Immediate Medical Needs	37	3%	38	4%	8	12%
Limited Transportation	32	2%	3	0%	13	19%
Minor Child (w/o adult)	16	1%	3	0%	3	4%
Limited Literacy	16	1%	83	9%	6	9%
Limited English	16	1%	160	18%	0	0%

The below table regarding vulnerabilities of case management clients shows that DR-4610 saw many cases, in which people were uninsured/underinsured or dealing with housing insecurity, poverty, or unemployment. DR-4610 saw many cases, in which people spoke limited English, were uninsured/underinsured, or dealing with unemployment or emotional distress.

When asked about housing goals, residents in both disasters overwhelmingly wanted to stay in the county in comparison to other answer choices, with more than 30 percent wanting to remain in the county and only about 2 or 3 percent wanting to leave.

FIGURE 69: CASE MANAGEMENT HOUSING GOALS

Ultimate Housing Goal	DR-4558 Number	DR-4558 Percent	DR-4569 Number	DR-4569 Percent
Stay in County	505	35%	388	43%
Stay, Renter	196	14%	203	22%
Stay, Owner	283	20%	167	18%
Stay, Undecided	12	1%	10	1%
Stay, Other	14	1%	8	1%
Leave County	49	3%	18	2%

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Leave, Renter	26	2%	14	2%
Leave, Owner	15	1%	3	0%
Leave, Undecided	5	0%	0	0%
Leave, Other	3	0%	0	0%
Unknown	41	3%	52	6%

When asked about housing goals, residents in DR-4610 counties overwhelmingly wanted to stay in the county, with more than 90 percent wanting to remain in the county.

Data about needs reveals that the highest needs for DR-4558 were household needs, repair/rebuild, advocacy, and food/nutrition. For DR-4569, the top needs were utilities, household needs, food/nutrition, and repair/rebuild. For both disasters, the lowest ranked needs included domestic animal services, funeral assistance, and missing person assistance.

FIGURE 70: CASE MANAGEMENT NEEDS

Needs	DR-4558 Number	DR-4558 Percent	DR-4569 Number	DR-4569 Percent	DR-4610 Number	DR-4610 Percent
Household Needs	284	20%	129	14%	39	58%
Repair/Rebuild	274	19%	102	11%	28	42%
Advocacy	222	16%	27	3%	56	84%
Food/Nutrition	203	14%	105	12%	24	36%
Clothing	143	10%	90	10%	23	34%
Utilities	143	10%	152	17%	22	33%
Emotional/Spiritual Care	114	8%	27	3%	33	49%
Employment Assistance	94	7%	52	6%	13	19%
Functional Needs (AFN)	74	5%	10	1%	5	7%
Transportation	71	5%	15	2%	21	31%

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Removal of Debris	63	4%	20	2%	5	7%
Legal Assistance	40	3%	14	2%	13	19%
Medical Assistance	38	3%	21	2%	16	24%
Education/Job Training	35	2%	10	1%	6	9%
Domestic Animal Services	29	2%	5	1%	11	16%
Children's Services	22	2%	23	3%	4	6%
Medical Insurance	17	1%	13	1%	9	13%
Funeral Assistance	0	0%	1	0%	0	0%
Missing Person Assistance	0	0%	0	0%	0	0%

Data about needs reveals that the highest needs for DR-4610 were advocacy, household needs, emotional care, repair/rebuild, and food/nutrition. For 4610 disasters, the lowest ranked needs included funeral assistance, missing person assistance, and children’s services. DR-4610 case management needs data are through 5/31/2022.

California HOPE Program

The California HOPE program was launched after the 2017 wildfires to provide mental health support to survivors of disasters. HOPE is funded by FEMA and is administered by the California State Mental Health Authority (CMHA). California HOPE counselors work with to process immediate trauma and loss, prioritize needs and solve problems, develop coping strategies, and connect with people and agencies for continued support.

Disaster CalFresh

Disaster CalFresh is the statewide Supplemental Nutrition Assistance Program (SNAP) that provides monthly food benefits for low-income Californians. Disaster CalFresh (D-CalFresh or D-SNAP) is activated to meet the temporary nutritional needs of disaster survivors within the first 30-days after a Presidential Declaration for Individual Assistance has been declared, commercial food distribution has been disrupted, and the State of California has approved D-CalFresh operation. The table below shows that 294 households were served in the disaster impacted counties, totaling \$144,493 in operations. This was done in four waves in nearly every county except Lassen, San Mateo, Stanislaus, Trinity, Tulare, and Yolo.

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FIGURE 71: D-SNAP APPLICANTS FOR DR-4558 AND DR-4569

Wave	Disaster CalFresh Impacted Counties	Approval Date	Number of Households Served	Total D-CalFresh Issuances
One	Lake, Monterey, San Mateo, Santa Cruz, Solano, and Yolo	29-Sep-20	71	\$32,716
Two	Butte, Napa and Sonoma	29-Sep-20	50	\$22,339
Three	Santa Clara	9-Oct-20	8	\$3,345
Four	Fresno, Los Angeles, Madera, Mendocino, Napa, San Bernardino, San Diego, Shasta, Siskiyou, and Sonoma	5-Nov-20	165	\$86,093
D-CalFresh Totals			294	\$144,493

CalFresh is the statewide Supplemental Nutrition Assistance Program (SNAP) that provides monthly food benefits for low-income Californians. Disaster CalFresh (D-CalFresh or D-SNAP) is activated to meet the temporary nutritional needs of disaster survivors within the first 30-days after a Presidential Declaration for Individual Assistance has been declared, commercial food distribution has been disrupted, and the State of California has approved D-CalFresh operation. The table below shows the number of households served in the disaster impacted counties.

FIGURE 72 D-SNAP APPLICANTS FOR DR-4610

Counties	Total Applications Received	Approved Households	Total Benefits
Lassen	38	26	\$13,621
Nevada	9	0	\$0
Placer	8	2	\$860
Plumas	18	9	\$4,396
Tehama	4	0	\$0
Trinity	8	3	\$1,047

Disaster CalFresh - 2021

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2.1.7 Grantee Demographics and Disaster Impacted Populations

HCD assesses all programs to evaluate the equity and impact on protected classes. Disaster impacts vulnerable populations disproportionately due to “housing patterns, building construction, community isolation and cultural insensitivity.” A 2021 New York Times article entitled “Why Does Disaster Aid Often Favor White People” found that white disaster victims often receive more disaster aid from FEMA than their Black neighbors. The report found that white residents of counties with significant disaster damage that received FEMA assistance had their wealth increase years later (five times as much, on average, as white residents who had not experienced FEMA assistance) while Black residents maintained less wealth in the same time period.

FIGURE 73: DR-4558 & DR-4569 - DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	39,538,223.00	0%	23,039,043.00	58%	12,140,742.00	31%
Under 5 years	2,451,528.00	6%	1,454,957.00	6%	777,087.00	6%
65 years and over	5,486,041.00	14%	3,110,821.00	14%	1,736,517.00	14%
Population with a Disability	4,101,034.00	11%	2,299,920.00	10%	1,327,569.00	11%
White or Caucasian	16,296,122.00	41%	8,931,307.00	38%	4,229,750.00	35%
Black or African American	2,237,044.00	6%	1,373,008.00	6%	914,961.00	8%
American Indian and Alaska Native	631,016.00	2%	381,882.00	2%	202,962.00	2%
Asian	6,085,947.00	15%	3,450,398.00	15%	1,720,805.00	14%
Native Hawaiian and Other Pacific Islander	157,263.00	0%	81,893.00	0%	31,692.00	0%
Other	14,130,831.00	36%	8,820,558.00	38%	5,040,572.00	42%

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Data Source(s): U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates S1810 DISABILITY CHARACTERISTICS, U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates S0101 AGE AND SEX, 2020 DEC B02001 RACE

The table below shows some key demographic categories compared in the state, the entire impacted areas, the most impacted and distressed areas, and the size and percentage of Hispanic communities in disaster impacted counties. The data indicates that the majority of the population in the most impacted areas are White or Caucasian.

FIGURE 74: DR-4610 GRANTEE DEMOGRAPHICS AND DISASTER IMPACTED POPULATIONS

<u>Demographic</u>	<u>Area-Wide Estimates</u>	<u>Area-Wide Percent</u>	<u>Disaster Declaration Estimate</u>	<u>Disaster Declaration Percent</u>	<u>MID Estimates</u>	<u>MID Percent</u>
Total Population	39,346,023	100%	617,377	1.5%	18,844	0.05%
Under 5 years	2,409,082	6.1%	31,406	4.8%	796	4.2%
65 years and over	5,644,497	14.3%	129,720	22.81%	5,217	27.7%
Population with a disability	4,146,951	10.7%	75,541	15.73%	3,131	16.8%
White or Caucasian	22,053,721	56.1%	512,076	84.9%	16,679	88.5%
Black or African American	2,250,962	5.7%	10,197	2.26%	279	1.5%
American Indian and Alaska Native	311,629	0.8%	5,431	2.11%	350	1.9%
Asian	5,834,312	14.8%	35,083	2.6%	232	1.2%
Native Hawaiian and Other Pacific Islander	149,636	0.4%	1,398	0.28%	29	0.2%
Other	5,623,747	14.3%	16,724	2.86%	334	1.8%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

FIGURE 75: DEMOGRAPHICS BY RACE FOR DR-4610 COUNTIES

County	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Population of two or more races

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Lassen	24,181	2,713	794	471	256	840	1,345
Nevada	91,597	410	496	1,108	150	1,172	4,484
Placer	314,938	6,310	2,204	31,938	910	10,585	24,914
Plumas	16,679	279	350	232	29	334	941
Tehama	53,987	420	865	1,090	18	3,344	4,452
Trinity	10,694	65	722	244	35	449	332

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

2.1.8 Income Demographics

FIGURE 76: INCOME DEMOGRAPHICS

Income/Economic Demographics	Statewide	Areas Impacted by 2020 Disaster	Areas Impacted by 2021 Disaster
Median Household Income	\$75,235.00	\$68,259.00	\$61,148
Per Capita Income	\$36,955.00	\$33,260.00	\$32,934

Data Source(s): U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates S1901 INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)

2.1.9 Income Demographics - Low Income

FIGURE 77: INCOME DEMOGRAPHICS – LOW INCOME

Income/Economic Demographics	Statewide	Areas Impacted by 2020 Disaster	HUD 2020 MIDs	Areas Impacted by 2021 Disaster	HUD 2021 MID
Income in the past 12 months below poverty level	5,149,742	3,157,508	1,880,348	617,377	18,844

Data Source(s): U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates S1901 INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)

2.1.10 LMI Analysis - Area Wide

FIGURE 78: LMI ANALYSIS - AREA WIDE

Category	Total LMI Persons	Total Population	Percent LMI
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Area wide	16,777,932.00	34,832,254.00	48%
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Data Source(s): HUD FY 2021 (2011-2015 ACS)

2.1.11 LMI Analysis - Federally Declared Disaster Areas

FIGURE 79: DR-4558 & 4569 LMI ANALYSIS - FEDERALLY DECLARED DISASTER AREAS

County	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Butte	0.00	0.00	0%	99,833.00	217,095.00	46%
Lake	32,500.00	63,175.00	51%	0.00	0.00	0%
Lassen	8,355.00	21,270.00	39%	0.00	0.00	0%
Monterey	200,300.00	408,775.00	49%	0.00	0.00	0%
San Mateo	339,795.00	738,965.00	46%	0.00	0.00	0%
Santa Clara	753,489.00	1,834,320.00	41%	0.00	0.00	0%
Santa Cruz	0.00	0.00	0%	128,945.00	257,450.00	50%
Solano	0.00	0.00	0%	163,204.00	414,760.00	39%
Stanislaus	108,434.00	247,325.00	44%	0.00	0.00	0%
Trinity	6,360.00	13,055.00	49%	0.00	0.00	0%
Tulare	240,338.00	448,083.00	54%	0.00	0.00	0%
Yolo	100,465.00	199,245.00	50%	0.00	0.00	0%
Fresno	0.00	0.00	0%	462,085.00	938,780.00	49%
Los Angeles	0.00	0.00	0%	5,526,154.00	9,863,025.00	56%
Madera	69,150.00	144,375.00	48%	0.00	0.00	0%
San Bernadino	894,868.00	2,034,425.00	44%	0.00	0.00	0%
San Diego	1,494,810.00	3,134,090.00	48%	0.00	0.00	0%
Shasta	0.00	0.00	0%	75,015.00	175,925.00	43%
Siskiyou	0.00	0.00	0%	21,860.00	43,270.00	51%
Napa	0.00	0.00	0%	56,784.00	135,720.00	42%

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Sonoma	0.00	0.00	0%	199,775.00	486,145.00	41%
2020 Disaster Total	4,248,864.00	9,287,103.00	0%	6,733,655.00	12,532,170.00	0%

Data Source(s): HUD FY 2021 (2011-2015 ACS)

FIGURE 80: DR-4610 LMI ANALYSIS - FEDERALLY DECLARED DISASTER AREAS

County	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Lassen	8,360	21,730	40.54%	0	0	0
Nevada	38,295	97,410	40.33%	0	0	0
Placer	113,914	362,205	34.48%	0	0	0
Plumas	--	--	--	7,575	18,565	38.58%
Tehama	4,770	8,625	49.75%	0	0	0
Trinity	6,365	13,065	50.67%	0	0	0
Total	171,704	503,035	-	7,575	18,565	-

Data Source(s): HUD FY 2021 (2011-2015 ACS)

2.1.12 Manufactured Housing Units Impacted by Disaster

FIGURE 81: DR-4558 & DR-4569 MANUFACTURED HOUSING UNITS IMPACTED BY DISASTER

County/Municipality	Number of Units	% of Total Units in County/Municipality	Remaining Unmet Need
Butte	484.00	4%	\$0.00
Fresno	30.00	0%	\$0.00
Lake	1.00	0%	\$0.00
Lassen	15.00	1%	\$0.00
Los Angeles	7.00	0%	\$0.00
Madera	4.00	0%	\$0.00
Mendocino	5.00	0%	\$0.00

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Monterey	0.00	0%	\$0.00
Napa	113.00	3%	\$0.00
San Bernadino	0.00	0%	\$0.00
San Diego	0.00	0%	\$0.00
San Mateo	3.00	0%	\$0.00
Santa Clara	17.00	0%	\$0.00
Santa Cruz	39.00	1%	\$0.00
Shasta	39.00	0%	\$0.00
Siskiyou	81.00	3%	\$0.00
Solano	27.00	1%	\$0.00
Sonoma	23.00	0%	\$0.00
Stanislaus	1.00	0%	\$0.00
Trinity	4.00	0%	\$0.00
Tulare	0.00	0%	\$0.00
Yolo	1.00	0%	\$0.00
Total	894.00	14%	\$0.00

Data Source(s): U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates
 SELECTED HOUSING CHARACTERISTICS DP04, CAL FIRE Damage Assessment

FIGURE 82: DR-4610 MANUFACTURED HOUSING UNITS IMPACTED BY DISASTER

County/Municipality	Number of Units	% of Total Units in County/Municipality	Remaining Unmet Need
Lassen	38	5.24%	\$0
Nevada	12	5.21%	\$0
Placer	5	3.4%	\$0
Plumas	197	5.64%	\$0
Tehama	15	5.66%	\$0
Trinity	6	2.06%	\$0

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Total	263	27.21	\$0
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Data Source(s): U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates
 SELECTED HOUSING CHARACTERISTICS DP04, CAL FIRE Damage Assessment

2.1.13 Limited English Proficiency Breakdown of Disaster-Related Areas

The Civil Rights Act of 1964 prohibits discrimination on the basis of national origin and requires that government entities ensure that persons with Limited English Proficiency (LEP) have access to the same benefits, services, and information as English-speaking residents. As such, disaster preparedness and recovery must consider and plan for those who need translators and translated materials.

The table below shows the total and percent Limited English Proficiency populations in all disaster impacted counties.

FIGURE 83: DR-4558 & DR-4569 LIMITED ENGLISH PROFICIENCY BREAKDOWN OF DISASTER-RELATED AREAS

County/Municipality	Estimate Speak English Less than 'Very Well'	Percent Speak English Less than 'Very Well'
Butte	11,570.00	5%
Fresno	168,608.00	19%
Lake	4,042.00	7%
Lassen	1,967.00	7%
Los Angeles	2,235,700.00	24%
Madera	27,593.00	19%
Mendocino	6,898.00	8%
Monterey	109,625.00	27%
Napa	20,394.00	15%
San Bernardino	296,911.00	15%
San Diego	426,297.00	14%
San Mateo	125,053.00	17%
Santa Clara	364,947.00	20%
Santa Cruz	32,869.00	13%
Shasta	3,816.00	2%

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Siskiyou	1,347.00	12%
Solano	48,222.00	12%
Sonoma	52,730.00	11%
Stanislaus	83,068.00	17%
Trinity	255.00	2%
Tulare	111,250.00	26%
Yolo	26,705.00	13%

Data Source(s): U.S. Census Bureau, 2015-2019 American Community Survey, 5-Year Estimates
 B16008 CITIZENSHIP STATUS BY AGE BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH

FIGURE 84: DR-4610 POPULATION WITH LIMITED ENGLISH PROFICIENCY

County	Total population over 5	People who speak less than very well	Percent of people who speak English less than very well
Lassen	29,222	2,130	7.3%
Nevada	95,265	2,211	2.3%
Placer	371,120	16,418	4.4%
Plumas	18,048	359	2.0%
Tehama	60,369	3,506	5.8%
Trinity	11,947	150	1.3%

Source: U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates

2.1.14 Point-in-Time Count - Type of Shelter

These counts measured the number of sheltered and unsheltered persons experiencing homelessness in each of the continuum of care regions, some of which are shared by multiple counties. Some of the counties share the same continuum of care regions and resources.

Additional data from the same point-in time count reveals that the majority individuals seeking shelter after disasters in impacted CoCs come from unhoused populations.

FIGURE 85: DR-4558 & DR-4569 POINT-IN-TIME COUNT - TYPE OF SHELTER

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
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Area wide	35,966	11,922	113,660	161,548
FEMA Declared	24,818	8,035	80,730	113,583
MID	16,940	4,568	55,269	76,777

Data Source(s): HUDexchange.info, 2020 CoC Homeless Populations and Subpopulations Reports:
<https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

FIGURE 86: DR-4610 POINT-IN-TIME COUNT - TYPE OF SHELTER

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	35,966	11,922	113,660	161,548
FEMA Declared	1,286	652	3,067	4,750
MID	436	189	1,023	1,529

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Point-in Time County *The 2020 count took place in January 2020. This year was chosen because it counted the unsheltered population while the 2021 counts likely undercounted due to COVID-19 limitation.

2.1.15 Point-in-Time Count - Impacted by Disaster

FIGURE 87: DR-4558 & DR-4569 POINT-IN-TIME COUNT - IMPACTED BY DISASTER

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
State wide	35,966	11,922	113,660	116,548
FEMA Declared	24,818	8,035	80,730	113,583
MID	16,940	4,568	55,269	76,777

Data Source(s): HUDexchange.info, 2020 CoC Homeless Populations and Subpopulations Reports:
<https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

FIGURE 88: DR-4610 POINT-IN-TIME COUNT - TYPE OF SHELTER

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	35,966	11,922	113,660	161,548
FEMA Declared	1,286	652	3,067	4,750
MID (Plumas County)	436	189	1,023	1,529

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Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Point-in Time County *The 2020 count took place in January 2020. This year was chosen because it counted the unsheltered population while the 2021 counts likely undercounted due to COVID-19 limitation.

2.1.16 Assisted Housing Impacted by the Disaster

FIGURE 89: DR-4558 & DR-4569 ASSISTED HOUSING IMPACTED BY THE DISASTER

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Napa - 2020	1,074	3	20	0	1,911	0	\$965,205
Santa Cruz - 2020	4,698	4	41	0	6,266	0	\$1,286,940
Total	5,772	7	61	0	8,177	0	\$2,252,145

Data Source(s): <https://hudgis-hud.opendata.arcgis.com/search?collection=Dataset&q=hcv>; Accessed May 31, 2022

FIGURE 90: DR-4610 ASSISTED HOUSING IMPACTED BY THE DISASTER

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Placer	807	0	5,065	0	-	0	0
Plumas	47	0	94	0	96	0	0
Nevada	78	0	1,589	0	-	0	0
Tehama	366	0	653	0	-	0	0
Trinity	30	0	0	0	-	0	0
Lassen	135	0	308	0	-	0	0
Total	1,463	0	7,709	0	96	0	0

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Source: California Housing Partnership “Affordable Housing Map and Benefits Calculator”; Esri; Accessed May 30, 2023

2.2 Infrastructure Unmet Need

2.2.1 Disaster Damage and Impacts - Infrastructure

The FEMA Public Assistance (FEMA PA) program is designed to provide immediate assistance to disaster-impacted jurisdictions for emergency work (under FEMA Sections 403 and 407) and permanent work (Sections 406 and 428) on infrastructure and community facilities. Data from these programs was used to assess the impact of the disasters on infrastructure and calculate unmet need.

Although there is a clear need for infrastructure repair and improvements, this Action Plan focuses on unmet recovery needs with prioritization given to housing recovery and housing-related infrastructure projects. One reason for this prioritization is that although total project costs have been calculated, project eligibility has not been determined for all project worksheets submitted. Therefore, the local share figures are preliminary and likely to increase substantially moving forward. In total the total cost share needed for both state and local match for FEMA PA projects for 2020 disasters is \$10,072,692 and local share only is \$2,518,240.

FEMA PA projects fall under the following categories:

- Emergency Protective Work
- Category A - Debris Removal
- Category B - Emergency Protective Measures
- Permanent Work
- Category C - Roads and Bridges
- Category D - Water Control Facilities
- Category E - Public Buildings and Contents
- Category F - Public Utilities
- Category G - Parks, Recreational, and Other Facilities

The following tables summarize the FEMA PA assistance in review by FEMA and the California Governor's Office of Emergency Services (CalOES) as of February 2022. As noted above, these values are subject to change and will be re-evaluated as the Action Plan is amended and/or through program design. Across areas impacted by DR-4558 and DR-4569, impacted counties submitted FEMA PA projects totaling over \$46 million for Categories C through G. A majority of the requests were made for Category F - Utilities, followed by Category C - Roads and Bridges. DR-4610-impacted counties reported \$19,507,662 in total impact for FEMA PA Categories C-G, with \$17,507,662 in total resources and \$1,950,966 in unmet need.

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2.2.2 Total Cost and Need by PA Category

FIGURE 91: DR-4558 AND DR-4569 TOTAL COST AND NEED BY PA CATEGORY

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$0.00	\$0.00	\$0.00	\$0.00
B - Emergency Measures	\$0.00	\$0.00	\$0.00	\$0.00
C - Roads and Bridges	\$17,464,207.00	\$818,635.00	\$122,795.00	\$941,430.00
D - Water Control Facilities	\$130,576.00	\$6,121.00	\$918.00	\$7,039.00
E - Building and Equipment	\$8,651,854.00	\$405,556.00	\$60,833.00	\$466,389.00
F - Utilities	\$24,223,703.00	\$1,135,486.00	\$170,323.00	\$1,305,809.00
G - Other	\$3,252,121.00	\$152,443.00	\$22,866.00	\$175,310.00
Total	\$53,722,461.00	\$2,518,241.00	\$377,735.00	\$2,895,977.00

Data Source(s): FEMA February 2022

The following figure outlines the FEMA PA requests from jurisdictions impacted by the DR-4610 disasters. The total request for FEMA PA projects Category C through G totals \$19.5 million. Category F (Utilities) and Category E (Building & Equipment) represent over half of PA damage and unmet need.

The following table summarizes the FEMA PA total estimated damage and unmet needs in review by FEMA and the California Governor's Office of Emergency Services (CalOES) as of August 2022. The total local unmet needs, including local match and resiliency, are \$2,243,381.

FIGURE 92: DR-4610 TOTAL COST AND NEED BY PA CATEGORY

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$0.00	\$0.00	\$0.00	\$0.00
B - Emergency Measures	\$0.00	\$0.00	\$0.00	\$0.00

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C - Roads and Bridges	\$ 1,622,821.44	\$ 162,282.12	\$24,342	\$186,624
D - Water Control Facilities	\$ 992,599.77	\$ 99,259.97	\$14,889	\$114,149
E - Building and Equipment	\$ 7,067,856.30	\$ 706,785.61	\$106,018	\$812,803
F - Utilities	\$ 9,756,981.73	\$ 975,698.13	\$146,355	\$1,122,053
G - Other	\$ 67,402.89	\$ 6,740.28	\$1,011	\$7,751
Total	\$ 19,507,662.13	\$ 1,950,766.11	\$292,615	\$2,243,381

Data Source(s): FEMA August 2022

In the DR-4610 MID, Plumas County experienced infrastructure losses from both the wildfire and the wildfire suppression activities. The county experienced 15,000 cubic feet in road damages from fire suppression activities and equipment and lost over 1,000 utility poles. These damages limit access and supply chains in recovering communities. Lack of broadband access prevents banks from providing services in the county, also hindering economic recovery.

2.2.3 Hazard Mitigation Needs per County or Known Project

The FEMA Hazard Mitigation Grant Program (HMGP) serves as a resource to fund programs that reduce the risk of loss of life and property and is activated following a presidential major disaster declaration. HMGP funds, provided at the amount of FEMA disaster recovery assistance under the presidential declaration, are allocated on a sliding scale formula based on an appropriate percentage of the estimated total of federal assistance (less administrative costs) wherein each individual activity is required to have at least a 25 percent non-federal cost share.

CalOES manages the State of California's HMGP program in coordination with FEMA and provided the following data in August 2022. This data will continue to evolve as projects are approved by FEMA and any changes will be reflected in subsequent Action Plan amendments or program design.

FIGURE 93: DR-4558 & DR-4569 HAZARD MITIGATION NEEDS PER COUNTY OR KNOWN PROJECT

Project	Cost	Funding Source	Unmet Need
Butte	\$985,300.00	FEMA HMGP	\$246,325.00
Lake	\$2,690,229.00	FEMA HMGP	\$675,891.00
Los Angeles	\$16,636,780.00	FEMA HMGP	\$6,092,427.00
Mendocino	\$1,653,059.00	FEMA HMGP	\$444,763.00
Monterey	\$775,864.00	FEMA HMGP	\$135,824.00

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Napa	\$9,265,916.00	FEMA HMGP	\$1,517,306.00
San Bernardino	\$1,500,000.00	FEMA HMGP	\$187,500.00
San Diego	\$1,671,576.00	FEMA HMGP	\$360,686.00
San Mateo	\$12,382,311.00	FEMA HMGP	\$3,104,997.00
Santa Clara	\$3,106,169.00	FEMA HMGP	\$747,880.00
Santa Cruz	\$2,402,972.00	FEMA HMGP	\$783,669.00
Shasta	\$23,542,135.00	FEMA HMGP	\$7,836,992.00
Sonoma	\$6,108,076.00	FEMA HMGP	\$1,681,679.00
Trinity	\$9,999,976.00	FEMA HMGP	\$2,499,994.00
Tulare	\$100,000.00	FEMA HMGP	\$25,000.00
Total	\$92,820,363.00	\$26,340,933.00	--

The figure below shows the total HMGP applications from DR-4610 impacted counties and reflect the mitigation needs of the disaster impacted areas. The disasters' total damage is about \$39.2 million and need a total of \$9.8 million in local match.

FIGURE 94: DR-4610 HMGP PROGRAM APPLICATIONS AND LOCAL MATCH

Project	Cost	Funding Source	Unmet Need
Lassen	\$13,465,077.60	FEMA HMGP	\$3,366,269.4
Nevada	\$17,615,837.20	FEMA HMGP	\$4,403,959.31
Placer	\$7,764,247.29	FEMA HMGP	\$1,941,061.82
Plumas	\$266,500	FEMA HMGP	\$66,625
Tehama	-	-	-
Trinity	\$121,200	FEMA HMGP	\$30,300
Total	\$39,232,862.09	-	\$9,808,215.53

Source: FEMA, August 2022

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2.3 Economic Revitalization Unmet Need

2.3.1 Disaster Damage and Impacts - Economic Revitalization

The SBA offers Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) to businesses to repair or replace disaster damaged property, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations such as charities, churches, and private universities are also eligible. The law limits these business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

In total for Business and EIDL approved applications in 2020 disaster impacted areas, applicants requested over \$86 million in support, while only \$7.2 million has been dispersed to date. This leaves \$78.8 million in unmet needs for businesses in impacted areas.

FIGURE 95: DR-4558 & DR-4569 TOTAL SBA BUSINESS LOANS APPROVED

County	Sum of Total Verified Loss	Sum of Total Amount Disbursed	Unmet Need
Butte	\$688,899	\$176,200	\$512,699
Fresno	\$126,426	\$110,200	\$16,226
Lake	\$0	\$112,600	\$0
Lassen	\$0	\$0	\$0
Los Angeles	\$12,000	\$12,000	\$0
Madera	\$0	\$0	\$0
Mendocino	\$0	\$0	\$0
Monterey	\$116,377	\$25,000	\$91,377
Napa	\$73,341,678	\$2,859,600	\$70,482,078
San Bernardino	\$0	\$0	\$0
San Diego	\$0	\$298,600	\$0
San Mateo	\$0	\$250,000	\$0
Santa Clara	\$0	\$900,000	\$0
Santa Cruz	\$1,397,188	\$885,100	\$512,088
Shasta	\$0	\$0	\$0

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Siskiyou	\$0	\$0	\$0
Solano	\$571,431	\$801,500	\$0
Sonoma	\$4,683,481	\$864,600	\$3,818,881
Stanislaus	\$0	\$0	40
Trinity	\$0	\$0	\$0
Tulare	\$0	\$0	\$0
Yolo	\$5,229,161	\$0	\$5,229,161
Total	\$86,171,242	\$7,295,400	\$78,875,842

FIGURE 96: SBA APPLICANT BREAKDOWN, EIDL AND BUSINESS LOANS – DR-4558

County	Approved	Auto Decline - Credit	Declined	Duplicate	Withdrawn	Grand Total
Butte	8	13	27	-	66	114
Lake	-	6	1	1	18	26
Lassen	-	1	-	-	1	2
Monterey	4	5	6	-	24	39
Napa	29	7	15	2	34	87
San Mateo	1	8	3	-	28	40
Santa Clara	-	5	8	1	27	41
Santa Cruz	13	19	23	3	83	141
Solano	7	6	9	-	33	55
Sonoma	7	10	6	-	29	52
Stanislaus	-	-	-	-	1	1
Tulare	-	3	-	-	2	5
Yolo	2	2	3	-	11	18
Grand Total	71	85	101	7	357	621

Source: Small Business Administration, January 2022

The following figure shows the breakdown of application status for DR-4569. Only 30 applications out of 428 have been approved.

FIGURE 97: SBA APPLICANT BREAKDOWN, EIDL AND BUSINESS LOANS – DR-4569

County	Approved	Auto Decline - Credit	Declined	Duplicate	Withdrawn	Grand Total
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Fresno	2	9	9	1	22	43
Los Angeles	2	43	35	2	81	163
Madera		2			9	11
Mendocino		2	1	1	7	11
Napa	23	3	13	1	22	62
San Bernardino		11	6		20	37
San Diego	2	10	7	1	24	44
Shasta			1		1	2
Siskiyou		2	14		9	25
Sonoma	1	8	5	2	14	30
Grand Total	30	90	91	8	209	428

Source: Small Business Administration, January 2022

The figure below compares the total applications compared to total approved application and the total amount of EIDL distributed to date for DR-4558 and DR-4569 impacted areas.

FIGURE 98: SBA ECONOMIC INJURY DISASTER LOAN, DR-4558

County - 4558	Total SBA EIDL Applications	Total Approved EIDL Applications	Total of EIDL Disbursed
Butte	11	1	\$25,000
Lake	6	1	\$112,600
Lassen	1	--	--
Monterey	12	--	--
Napa	30	3	\$139,600
San Mateo	18	--	--
Santa Clara	22	3	\$900,000
Santa Cruz	59	11	\$692,100
Solano	15	1	\$7,200
Sonoma	61	9	\$792,700
Stanislaus	1	----	--
Tulare	1	--	--
Yolo	4	--	--

Source: Small Business Administration, January 2022

FIGURE 99: EIDL AND BUSINESS LOANS - DR-4558

County - 4558	Approved	Total Loans	Total Verified Loss	Total Distributed
Butte	8	152	\$366,533,486	\$151,200
Lake		45	\$26,122	\$0

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Lassen		3	\$0	\$0
Mendocino		3	\$0	\$0
Monterey	4	49	\$1,340,705	\$25,000
Napa	29	114	\$76,974,096	\$2,720,000
San Mateo	1	63	\$933,223	\$250,000
Santa Clara		73	\$831,481	\$0
Santa Cruz	13	184	\$9,965,779	\$193,000
Solano	7	82	\$2,735,622	\$794,300
Sonoma	7	70	\$7,412,185	\$71,900
Stanislaus		2	\$0	\$0
Tulare		8	\$543,117	\$0
Yolo	2	32	\$5,913,825	\$0

Source: Small Business Administration, January 2022

FIGURE 100: SBA ECONOMIC INJURY DISASTER LOAN, DR-4569

4569 Counties	Total Applications	Total Approved Applications	Total of EIDL Disbursed
Fresno	404	30	\$60,200.00
Los Angeles	1100	26	--
Madera	73	4	--
Mendocino	45	3	--
Napa	215	48	--
San Bernardino	295	5	--
San Diego	353	10	\$298,600.00
Shasta	65	6	--
Siskiyou	131	28	--
Sonoma	224	18	--

Source: Small Business Administration, January 2022

FIGURE 101: EIDL AND BUSINESS LOANS - DR-4569

Counties - 4569	Total SBA Applications	Total Approved SBA Applications	Total Verified Loss	Total Distributed
Fresno	31	1	\$1,035,180	\$103,100
Los Angeles	113	1	\$42,660,710	\$12,000
Madera	8	--	\$1,400,988	\$0
Mendocino	9	--	\$508,653	\$0
Napa	45	23	\$88,031,414	\$100,000
San Bernardino	25	--	\$62,522	\$0
San Diego	29	--	\$1,530,898	\$0
Shasta		--	\$0	\$0
Siskiyou	23	--	\$21,091,956	\$0
Sonoma	19	1	\$1,265,478	\$25,000

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Total	302	26	\$157,587,799	\$240,100
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Source: Small Business Administration, January 2022

Tables below show the total of verified loss in 2021 disaster impacted areas over \$16.3 million, while only \$876,000 has been dispersed to date. This leaves about \$11.6 million in unmet needs for businesses in impacted areas.

FIGURE 102: DR-4610 TOTAL SBA BUSINESS LOANS APPROVED

Counties	Sum of Total Verified Loss	Sum of Total Amount Disbursed	Unmet Need
Lassen	\$245,178	\$58,900	\$98,178
Nevada	\$44,309	0	\$44,309
Placer	\$505,794	0	\$505,794
Plumas	\$15,382,073	\$817,100	\$10,915,973
Tehama	\$0	\$0	\$0
Trinity	\$199,513	\$0	34,315
Total	\$16,376,871	\$876,000	\$11,598,571

Source: Small Business Administration, Aug 7, 2022

In the 2021 MID, Plumas County has experienced compounding economic impacts from the Dixie Fire. The county experienced 15,000 cubic feet in road damages from fire suppression activities and equipment and lost over 1,000 utility poles. These damages limit access and supply chains in recovering communities. Lack of broadband access prevents banks from providing services in the county. The county was in the midst of a transition from resource extraction to recreation and tourism, but the fire is limiting access to recreational amenities for several years. The county experienced an estimated 1,611 in net job losses and 68 net business closures. The county reports that altogether these impacts resulted in over \$500,000 in reduced county property tax revenues in FY 22-23.

The following figure shows the breakdown of application status for DR-4610. Only 22 applications out of 159 have been approved.

FIGURE 103: SBA APPLICANT BREAKDOWN, EIDL AND BUSINESS LOANS – DR-4610

Counties	Approved	Auto Decline - Credit	Declined	Duplicate	Withdrawn	Grand Total
Lassen	4	10	5	0	13	32
Nevada	1	7	4	0	5	17
Placer	2	5	3	3	11	24
Plumas	15	13	18	1	30	77

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Tehama	0	1	2	0	3	6
Trinity	1	0	1	0	1	3
Grand Total	22	36	33	4	63	159

Source: Small Business Administration, Aug 7, 2022

The figure below compares the total of EIDL applications compared to total approved application and the total amount of EIDL disbursed to date for DR-4610 impacted areas.

FIGURE 104: SBA ECONOMIC INJURY DISASTER LOAN (EIDL), DR-4610

Counties	Total Applications	Total Approved Applications	Total of EIDL Disbursed
Lassen	12	2	\$32,300
Nevada	5	1	0
Placer	9	2	\$50,000
Plumas	16	3	\$1,156,600
Tehama	5	0	0
Trinity	1	0	0

Source: Small Business Administration, Aug 7, 2022

FIGURE 105: EIDL AND BUSINESS LOANS – DR-4610

Counties	Approved	Total Loans	Total Verified Loss	Total Distributed
Lassen	4	32	\$245,178	\$91,200
Nevada	1	17	\$44,309	0
Placer	2	24	\$505,794	\$50,000
Plumas	15	77	\$15,382,073	\$1,973,700
Tehama	0	6	\$0	0
Trinity	1	3	\$199,515	0
Total	23	159	\$16,376,869	\$2,114,900

Source: Small Business Administration, Aug 7, 2022

2.4 Mitigation Only Activities – Risk Based Needs Assessment

Overview

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The geographic breadth, unprecedented severity, and diversity of communities impacted by the 2020 and 2021 wildfires creates unique challenges to recovery, as well as opportunities to integrate mitigation activities critical to the state's resilience to future disasters.

The Federal Register Notice sets forth new requirements that grantees use 15 percent of their total allocation to fund mitigation activities and requires that grantees include a mitigation needs assessment in the Action Plan that clearly illustrates the connections between impacts of current and future hazards, mitigation needs, and proposed mitigation activities. To address this challenge, this Action Plan includes:

- A Mitigation Needs Assessment in this plan in addition to a disaster recovery-focused unmet needs assessment
- Proposed mitigation activities that clearly tie back to the 2020 disasters and the Mitigation Needs Assessment
- Proposed eligible activities that do not have a tie-back, but are tied to the Mitigation Needs Assessment and meet the HUD definition of mitigation
- Descriptions of how mitigation measures have been incorporated into recovery-related construction projects

Mitigation activities are those that increase resilience to future disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship.

HCD conducted the following risk-based assessment of current and future hazards to inform the use of the CDBG-DR mitigation set-aside. Ensuring continuous operation of indispensable services, which include critical business and government functions, services critical to health and human safety, and economic security for all community members, is vital to assessing and planning for disaster mitigation needs.

2.4.1 Mitigation Funding Background

On October 29, 2021, the U.S. Department of Housing and Urban Development (HUD) allocated over \$2 billion in Community Development Block Grant Disaster Recovery (CDBG-DR) funds appropriated by the Disaster Relief Supplemental Appropriations Act, 2022 (Public Law 117- 43). HUD allocated \$231,203,000 of that appropriation to the State of California for disaster recovery and mitigation activities as a result of the 2020 wildfires (DR-4558 and DR-4569), with \$30,157,000 identified as a "CDBG-DR mitigation set-aside amount."

HUD provided Federal Register Notice 6303-N-01 (the Notice) on February 3, 2022, as framework for CDBG-DR and MIT programming. The Notice provides definitions of mitigation activities, expenditure requirements, and funding timelines separate from the CDBG-DR allocation provided for the same disaster events.

Although Public Law 117- 43 tied the disaster recovery portion of the total allocation to the State of California to the 2020 wildfires, the mitigation set-aside intended to focus on preventative actions. The Notice requires that MIT funds respond to risks, based on a risk-based Mitigation Needs Assessment.

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Additionally, under the authority of Public Law 117-43, HUD announced on May 24, 2022, through Federal Register publication [87 FR 31636](#), California would be receiving \$14,761,000 in CDBG-DR funding for the DR-4610, of which \$1,926,000 is set aside for mitigation. Then, on November 30, 2022, HUD announced through a press release: [HUD Announces \\$1.447 Billion for 2021 Disaster Recovery and Mitigation | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#), that California would be receiving an additional \$9,647,000 in CDBG-DR funding for DR-4610, of which \$1,258,000 would be set aside for mitigation. These two grants together set aside \$3,184,000 for mitigation activities.

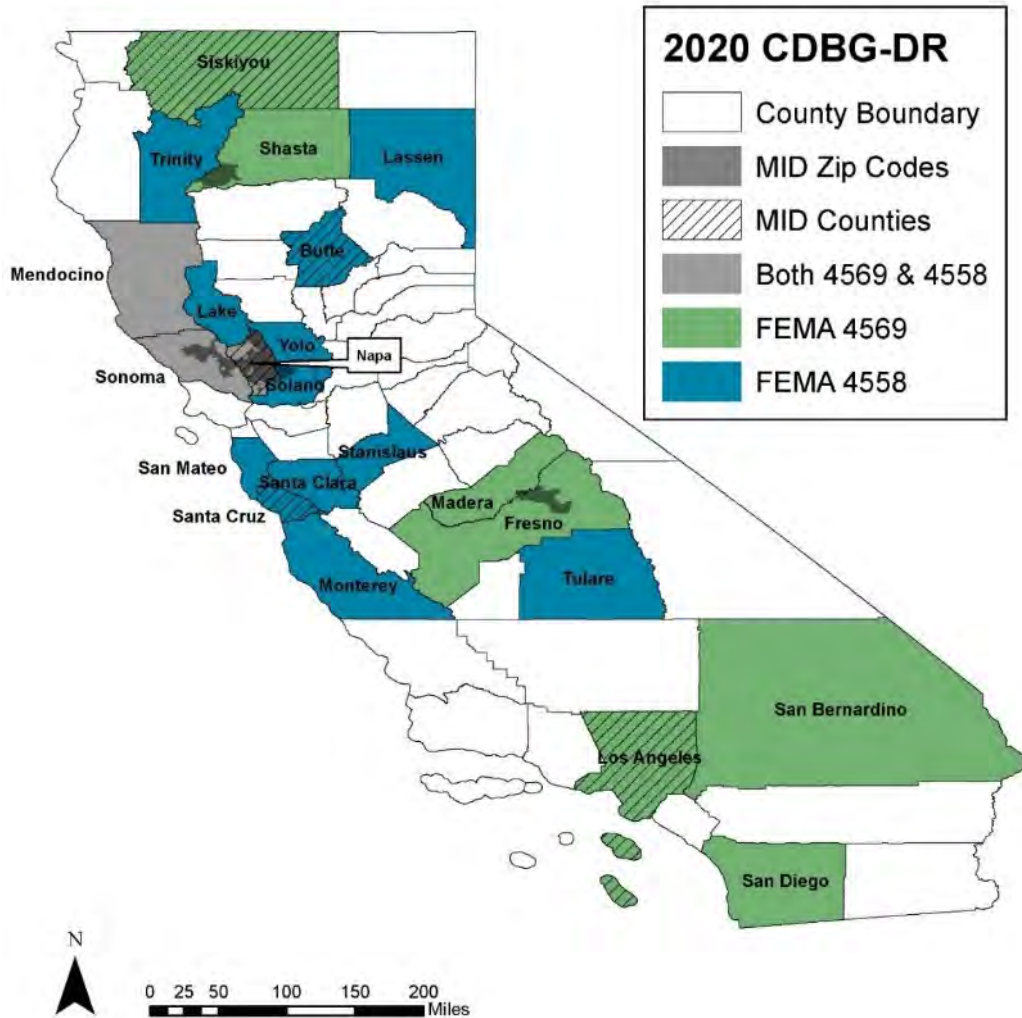
In the development of this Action Plan, HCD has reviewed and incorporated the following resources to enhance the Mitigation Needs Assessment.

- State of California's Hazard Mitigation Plan (SHMP)
- FEMA Local Mitigation Planning Handbook
- Department of Homeland Security (DHS) Office of Infrastructure Protection,
- National Association of Counties, Improving Lifelines Brief,
- S. Forest Service (USFS) wildland fire resources,
- National Interagency Coordination Center for coordinating the mobilization of resources for wildland fire, and
- HUD Community Planning and Development (CPD) Mapping tool
- MID Local Hazard Mitigation Plans (LHMPs)

The Mitigation Needs Assessment is updated to consider the California SHMP and LHMPs as they relate to the MIDs for the 2020 and 2021 wildfires (DR, 4558, DR-4569, and DR-4610).

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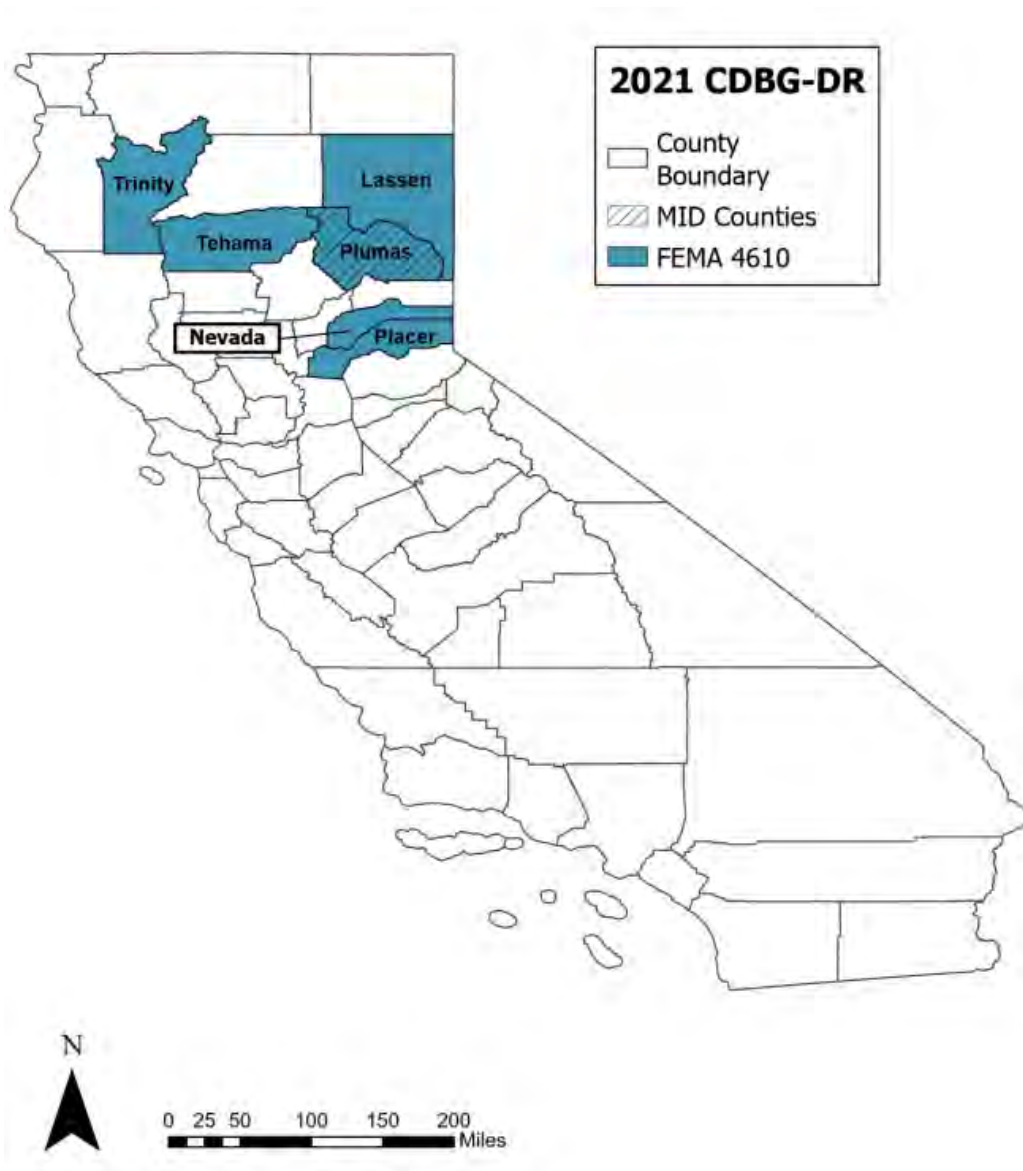
FIGURE 106: 2020 DECLARED DISASTERS AND MOST IMPACTED AND DISTRESSED AREAS



Source: HUD, ESRI

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FIGURE 107: 2021 DECLARED DISASTERS AND MOST IMPACTED AND DISTRESSED AREAS



Source: HUD, ESRI

2.4.2 Method

The Mitigation Needs Assessment builds on documents developed by the State of California to address state and local mitigation efforts including: the SHMP, the LHMPs, data collected from county resources, and the local stakeholder knowledge in disaster-impacted areas. The Mitigation Needs Assessment captures a point in time for the mitigation needs of the DR-4558, DR-4569, and DR-4610 impacted areas and responds to requirements set forth in the

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FRN. If new risks are identified, or risks identified in this Action Plan are addressed, the state may update the Mitigation Needs Assessment through a non-substantial or substantial Action Plan Amendment.

The following section provides a risk-based Mitigation Needs Assessment that identifies and analyzes current and future disasters.

The State of California's Hazard Mitigation Plan (SHMP) serves as the foundation for the Mitigation Needs Assessment. Drafted by the California Governor's Office of Emergency Services (Cal OES) and approved by FEMA in 2018, the SHMP is a federally mandated document that identifies hazards that could potentially affect California and lays out a state-wide plan to reduce loss of life and property that may be caused by a disaster. The SHMP is currently being updated and an update is expected later in 2023.

Cal OES led the development of the 2018 SHMP pursuant to 44 CFR part 201.4. The State Hazard Mitigation Team (SHMT) comprised of 800 members from public, private, local, tribal, state, and federal agencies, and over 300 organizations, drafted the SHMP using analysis and citizen participation processes to identify the state's top concerns. The development of this Action Plan, as well as all California action plans and amendments since 2018, were directly informed by findings and risk assessment produced by the 2018 SHMP process.

HUD requires an assessment of the State of California's most recent SHMP to inform the use of CDBG-DR funds for activities proposed in this plan.

The following section provides an overview of the SHMP and examines the state's overall risks.

As of August 2022, the 2018 SHMP remains the guiding document for the development of this Mitigation Needs Assessment. Cal OES is in the early stages of updating the SHMP, with the goal of approval and adoption by September 23, 2023. Cal OES and is convening working group meetings with partner state agencies to review and update relevant sections of the plan, and to document any changes from the 2018 publication.

The 2018 SHMP arranged risk assessments into groupings of hazards with similar characteristics. While the SHMP addresses a host of disasters with potential to impact the state, earthquakes, floods, and fires are still considered California's primary hazards. These three hazards have historically caused the greatest human, property, and/or monetary losses, as well as economic, social, and environmental disruptions within the state. They also have the greatest potential to cause significant losses and disruptions in the future.

Past major disaster events have led to the adoption of statewide plans for mitigation of these hazards, including the California Earthquake Loss Reduction Plan, State Flood Hazard Mitigation Plan, and California Fire Plan.

As a result of the frequency, intensity, and variety of California's past natural disasters, earthquake, flood, and fire hazards have long been identified as the State of California's main hazards of concern, including the findings of the 2018 SHMP.

For example, earthquake, while still considered a primary hazard, is grouped with related geologic hazards including landslides and volcanoes. Flooding is still considered a primary hazard, but the new flood hazards also include sections on other types of flood hazards,

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including coastal flooding, tsunami, levee failure, and dam safety. The third primary hazard, fire, includes both wildfire and structural fires. During the most recent SHMP update, the SHMT, made the decision with the Cal OES SHMP Coordinator to update the hazard organization structure using primary hazards, hazard grouping, and related secondary hazards.

FIGURE 108: STATE OF CALIFORNIA PRIMARY HAZARD GROUPING

Hazard	Hazard Grouping
Earthquake - Earthquakes represent the most destructive source of hazards, risk, and vulnerability, both in terms of recent state history and the probability of future destruction of greater magnitudes.	Landslide and Other Earth Movement Volcano
Flood - Floods represent the second most destructive source of hazard, vulnerability, and risk, both in terms of recent state history and the probability of future destruction at greater magnitudes than previously recorded.	Riverine, Stream and Alluvial Flood Sea-Level Rise, Coastal Flooding, and Erosion Tsunami and Seiche Levee Failure and Safety Dam Failure and Safety
Fire - California is recognized as one of the most fire-prone natural landscapes in the world.	Wildfire Urban Structural Fires

Source: CA SHMP Section 1.2 - page 8

2.4.3 Primary Hazard Rankings – 2020 and 2021 Impacted Counties

The relative rank of the three main hazards as derived from review of California-approved LHMPs as of April 2022 is shown in figure below. All counties have risk for the primary hazards of flood, fire, and earthquake, as these hazards are neither localized nor limited to any one region and have large area impact when they do occur. Counties with proximity to major fault lines or that contain areas with large amounts of biomass will have one or more of the primary hazards with a high ranking. Butte County has a high ranking for flood and fire risks because its geography includes the Sacramento River as well as large, forested areas. Butte County also contains a minor active fault line that covers a small area, but it is not as likely to cause the same amount of damage as a fire or flood, thus dropping the relative ranking for earthquake to moderate. The figure lists the higher ranked primary hazards by county, demonstrating that these are also not localized hazards. For example, a fire burning in Sonoma may spread and impact parts of Napa or Mendocino counties as well.

FIGURE 109: 2020 & 2021 IMPACTED COUNTIES BY STATE OF CALIFORNIA PRIMARY HAZARDS

Hazard	Ranking	Counties
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Earthquake	High	Lake, Los Angeles, Mendocino, Monterey, San Bernardino, San Mateo, Santa Clara, Santa Cruz, Shasta
Earthquake	Moderate to Low	Butte, Madera, Napa, Siskiyou, Trinity, Yolo, Placer, Plumas, Nevada, Tehama
Earthquake	*No Data as of May 2017	Lassen, San Diego, Stanislaus
Flood	High	Butte, Fresno, Lake, Los Angeles, San Bernardino, Santa Cruz, Shasta, Siskiyou, Solano, Sonoma, Yolo, Nevada, Tehama, Plumas, Placer
Flood	Moderate to Low	Madera, Mendocino, Napa, San Mateo, Santa Clara, Trinity
Flood	*No Data as of May 2017	Lassen, San Diego, Stanislaus
Fire	High	Butte, Fresno, Lake, Los Angeles, Madera, Monterey, Napa, San Bernardino, Santa Cruz, Shasta, Siskiyou, Solano, Sonoma, Trinity, Yolo, Tehama, Plumas, Placer, Nevada
Fire	Moderate to Low	Mendocino, San Mateo, Santa Clara
Fire	*No data as of May 2017	Lassen, San Diego, Stanislaus

In addition to the three primary hazards, the 2018 SHMP identifies other hazards of concern that impact various regions of the State of California. These other hazards typically are characterized by more isolated, localized, and/or infrequent disaster incidents. The figure below groups secondary hazards into three broad categories with two of the three being human-caused rather than natural disasters.

FIGURE 110: STATE OF CALIFORNIA OTHER HAZARDS OF CONCERN

Other Hazards Category Name	Secondary Hazards
Other Climate and Weather-Influenced Hazards	Agricultural and Silvicultural Pests and Diseases Air Pollution Aquatic Invasive Species Avalanches Drought and Water Shortages Energy Shortage and Energy Resiliency

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	Epidemic/Pandemic/Vector Borne Disease Extreme Heat Freeze Severe Weather and Storms Tree Mortality
Sociotechnical/ Technological Hazards	Hazardous Material Release Oil Spills Natural Gas Pipeline Hazards Radiological Accidents Train Accidents Resulting in Explosions and/or Toxic Releases Well Stimulation and Hydraulic Fracturing Hazards
Threat and Disturbance Hazards	Terrorism Cyber Threats Civil Disorder in California

The 2018 SHMP thoroughly categorizes each identified hazard, inclusive of a description, extent, location, hazard history, changing future conditions, impact, future probability, and emergency operation plan. This Action Plan’s Mitigation Needs Assessment does not reference all sections of the SHMP, but the full final plan is available on the Cal OES website.

The State of California has a total of 451 jurisdictions with adopted and FEMA-approved LHMPs. Cal OES Hazard Mitigation Planning staff administers the LHMP program for the state. The figure below provides information about the approval and expiration dates for LHMPs in the counties impacted by the 2020 and 2021 wildfires.

FIGURE 111: LHMPs YEAR APPROVED AND YEAR EXPIRED

Plan	Plan Approved	Plan Expiration
Butte County Local Hazard Mitigation Plan Update	October 2019	2024
Fresno County Multi-Hazard Mitigation Plan	2018	2023
Lake County Hazard Mitigation Plan Update	2018	2023
Lassen County Multi-Jurisdictional Hazard Mitigation Plan	2018	2023

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Los Angeles County All-Hazard Mitigation Plan	Update ongoing	N/A
Madera County Local Hazard Mitigation Plan Update	2017	2022
Mendocino County Multi-Hazard Mitigation Plan	2014	2019
Monterey County Hazard Mitigation Plan Update	Update ongoing	TBD
Napa County Operational Area Hazard Mitigation Plan Update	2020	2025
Nevada County Local Hazard Mitigation Plan	2017	2022
Placer County Local Hazard Mitigation Plan	2021	2026
Plumas County Local Hazard Mitigation Plan	2020	2025
San Bernardino County Multi-Jurisdictional Hazard Mitigation Plan	Update ongoing	TBD
San Diego County Multi-Jurisdictional Hazard Mitigation Plan	2018	2023
San Mateo Multi-Jurisdictional Local Hazard Mitigation Plan	update ongoing	TBD
Santa Clara County Operational Area Hazard Mitigation Plan	2017	2022
Santa Cruz Local Hazard Mitigation Plan	2021	2026
Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan	2017	2022
Siskiyou County Hazard Mitigation Plan	2019	2024
Solano County Multi-Jurisdictional Hazard Mitigation Plan	Update ongoing	TBD
Sonoma County Hazard Mitigation Plan Update	2016 (Update currently underway)	2021
Tehama County Multi-Jurisdictional Hazard Mitigation Plan	2018	2023

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Trinity County Hazard Mitigation Plan	September 2016	2021
Tulare County Hazard Mitigation Plan	2018	2023

2.4.4 California's Primary Hazards: Risks and Mitigation

The previous section described the State of California’s primary hazards. This section examines the risks and mitigation activities identified in the SHMP. Flooding and fire occur the most often. Most recently fire has emerged as an annual threat roughly comparable to floods. Earthquakes, on the other hand, have a lower frequency but can result in extreme disaster events and therefore remain California’s top primary hazard. A review of the risks imposed by each primary hazard related to the MID informed the Mitigation Needs Assessment and provided focus for proposing mitigation activities.

Earthquakes and Geologic Hazards

Earthquakes represent the most destructive hazard, both in terms of recent state history and the probability of future destruction, inclusive of risk and vulnerability. In the disaster-impacted counties, earthquakes are identified as a high hazard for six counties, and four counties have identified earthquakes as a moderate to low hazard.

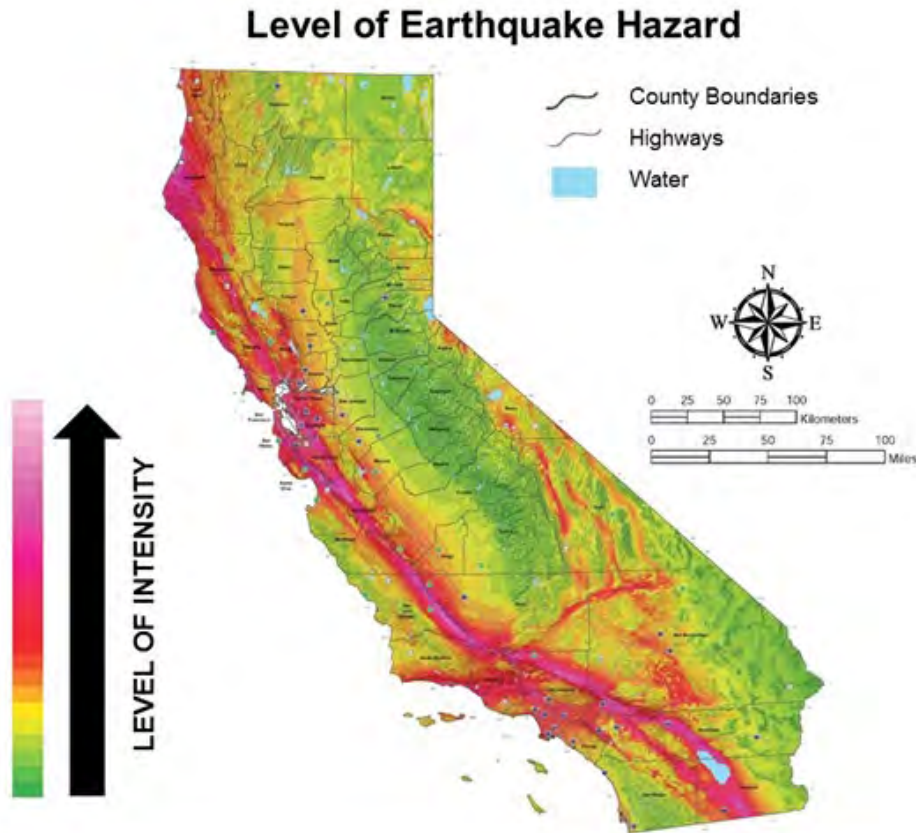
Probability of Seismic Hazards Statewide

Based on the most recent earthquake forecast model for California, the United States Geological Survey (USGS) and other scientists estimate a 72 percent probability that at least one earthquake of magnitude 6.7 or greater, capable of causing widespread damage, will strike the San Francisco Bay Area before 2044. For the Los Angeles region, the same model forecasts a 60 percent probability that an earthquake of magnitude 6.7 or greater will occur before 2044.

The figure below demonstrates the risks of impacts and damages from earthquake shaking throughout California. The more intense estimates follow the major fault lines in the state, such as the San Andreas, showing which counties are most at risk for building and infrastructure damage from intense shaking.

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FIGURE 112: EARTHQUAKE SHAKING HAZARD AFFECTING BUILDINGS



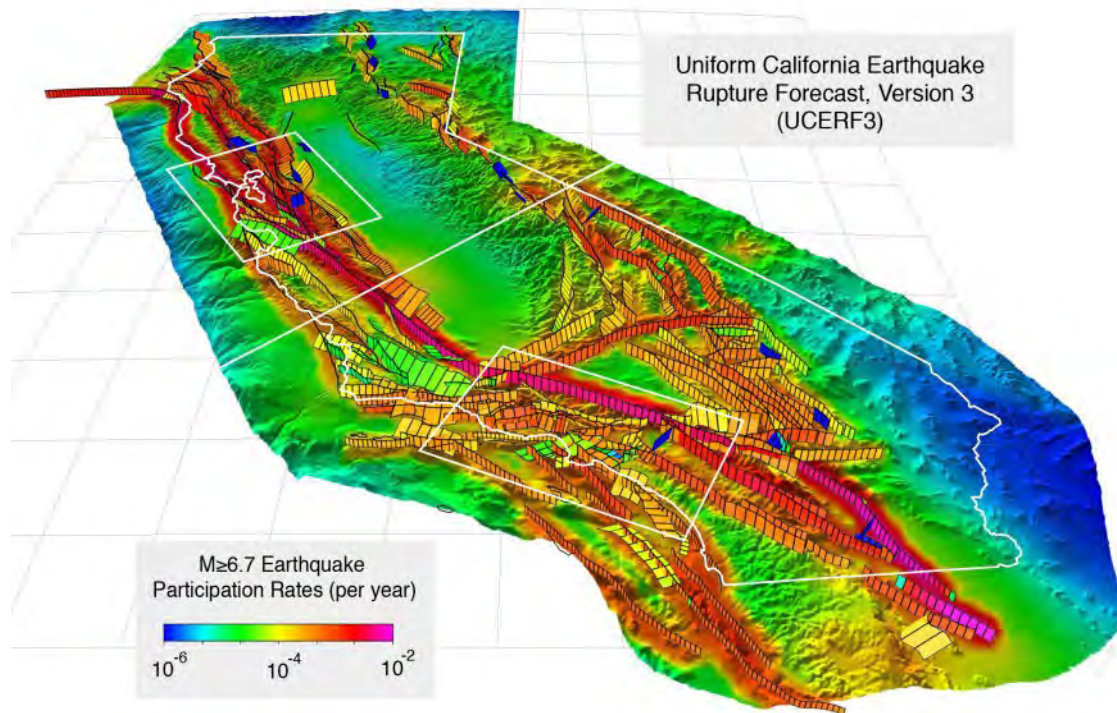
Source: Branum, D., R. Chen, M. Petersen and C. Wills. 2016. Earthquake Shaking Potential for California. California Geological Survey, United State Geological Survey. Available at https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_048.pdf

The figure below, from the USGS Open File Report 2013-1165, shows the likelihood of an intense earthquake (6.7 magnitude or greater) across fault lines within the state.

These two figures show the significance of earthquake risks and impacts to regions in California and the need for preparation and mitigation efforts to reduce the high probability of property and infrastructure damage during the next large earthquake or series of tremors.

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FIGURE 113: PROBABILITY OF EARTHQUAKE MAGNITUDE 6.7 OR GREATER OCCURRING IN 30 YEARS, BY REGION



Source: Field, Edward H., Glenn Biasi, Peter Bird, et al. 2013. Uniform California Earthquake Rupture Forecast Version 3 – The Time-Independent Model. U.S. Department of Interior and U.S. Geological Society. Available at: <https://pubs.usgs.gov/of/2013/1165/pdf/ofr2013-1165.pdf>

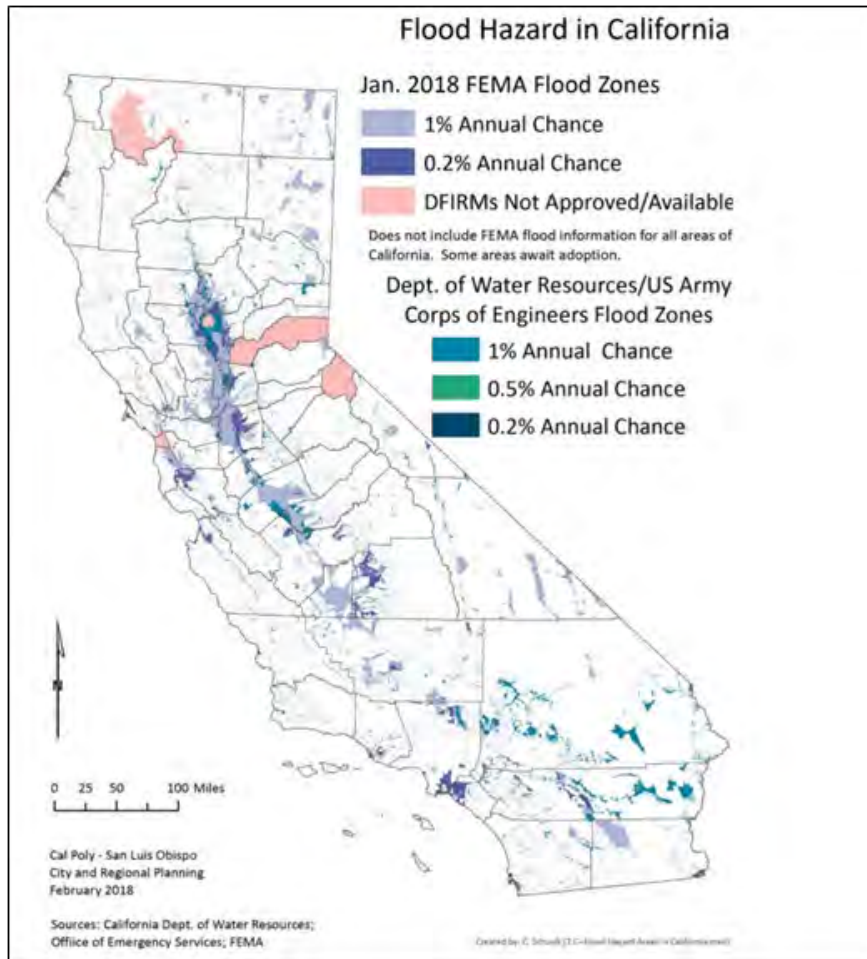
Probability of Flood Hazards Statewide

The Flood Insurance Rate Map (FIRM) designations identify components of the 500 year and 100-year floodplains. High concentrations of 1 percent annual chance flood hazard areas are shown throughout the Central Valley, especially in the Sacramento-San Joaquin Delta region, as well as in other inland regions.

The figure below, produced by the California Department of Water Resources, shows the flood hazard areas through the state. The areas designated for 1 percent and 5 percent flood hazards align with major rivers and delta systems that run through the Central Valley and Sacramento regions, as well as other significant watersheds and reservoirs across the state.

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FIGURE 114: FLOOD HAZARDS IN CALIFORNIA



Source: 2018 California State Hazard Mitigation Plan, Section 7.1, page 383

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FIGURE 115: FEMA FLOOD INSURANCE RATE MAP

Federal Emergency Management Agency (FEMA)
 Flood Insurance Rate Map (FIRM)



Source: 2018 California State Hazard Mitigation Plan, Section 7.1, page 386

Climate Change and Flood Hazards

Climate change impacts are already being felt throughout the State of California, including the disaster-impacted counties. Impacts are reflected in the reduction of precipitation in some regions and an increase in severity and frequency of flooding in other regions. Change in snowfall or rainfall patterns can also contribute to a severe increase in flooding events. Climate

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change impacts the variability, intensity, frequency, and seasonal patterns of California's primary hazards. For example, larger and more frequent wildfires brought on by climate change reduce the ability of a landscape to retain rainfall, which often leads to flooding and mudflows.

Wildfire Hazards

Wildfire hazards are the most prominent cause of damage and recovery efforts in California in recent years, as evidenced by a series of major disaster declarations and consistent fire incidents across the state since 2015.

In 2017, California received two significant national disaster declarations for wildfires that took place across Northern and Southern California over a span of approximately three months. DR-4344 burned over 200,000 acres, destroying an estimated 7,050 parcels and 8,922 structures. Additionally, 41 lives were lost in the Central LNU Complex fire in Napa and Sonoma Counties. DR-4353 burned over 300,000 acres in Southern California and destroyed over 1,000 residences. The fires also impacted electricity, gas, cellular telephone, internet, drainage, sewer, and water services. The damages caused by DR-4344 and DR-4353 were directly related to California's growing wildfire risk.

As described in earlier sections, the 2020 California wildfire season sparked nearly 9,000 fires that burned more than 4 percent of the state's roughly 100 million acres of land, making 2020 the largest wildfire season recorded in California's modern history.⁵⁹

The disasters of 2020 were followed closely by yet another historic fire season in 2021, when ongoing drought, extreme heat, reduced snowpack, and vastly diminished tree mass ignited an unusually early wildfire season in California. The President issued a major disaster declaration for Northern California in August of 2021, and by the end of season, approximately 8,800 fires had burned roughly 2.5 million acres of the state.⁶⁰

This trend shows no sign of slowing. According to broad scientific consensus, the frequency and severity of wildfires in North America are increasing due to climate change, which continues to drive hotter and drier fire seasons in the western United States.⁶¹

Probability of Fire Hazards Statewide

The SHMP identifies flammable expanses of brush, diseased timberland, overstocked forests, hot and dry summers, extreme topography, intense fire weather and wind events, summer lightning storms, and human acts as main culprits of California's wildfire threat. Repeated destructive fire events and intense fire seasons from 2015 through present day have reinforced the need to implement robust mitigation efforts.

The current drought in California started in early 2020, following a five-year state-wide drought from 2012 to 2017. By the end of 2020, nearly 75 percent of the state was in severe drought

⁵⁹ CAL FIRE, "2020 Wildfire Activity Report (2020 Redbook).

⁶⁰ Ibid.

⁶¹ Rebecca Miller, "Climate Change Is Central to California's Wildfires," *Scientific American*, October 29, 2020.

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conditions or worse. By August of 2021, nearly half of the state was in “exceptional drought conditions,” the most severe category of drought.⁶² After a brief reprieve in the fall and winter of that year caused by heavy rain and snow, conditions improved, and as of February 2022, most of California is considered under severe and moderate drought conditions, with only 2 percent of the state in extreme drought.

Continued drought conditions are particularly troublesome when paired with the impacts of earlier droughts and wildfires on tree growth and recovery across millions of acres. Drought severely impacts the health of California’s forests, which, under healthy conditions, can serve as a bulwark and stabilizer against rapidly spreading fires. In December 2017, the U.S. Forest Service (USFS) and CAL FIRE announced that a total of 129 million trees died due to drought and bark beetles across 8,900,000 acres of the state. Ongoing drought inhibited tree recovery, making forests vulnerable to bark beetles and increasing the wildfire risk for California communities. Under severe or long-term drought conditions, dead and dry trees and vegetation act as fuel for wildfires.

As of April 2022, several fire-prone areas of the state are experiencing the driest spring months on record. According to CAL FIRE’s 2022 Fire Season Outlook, dry conditions and higher-than-average temperatures are expected to continue through the spring and will likely result in moderate to extreme drought for most of the state by the summer.⁶³

Meanwhile, anthropogenic factors such as ignitions, infrastructure, and development at the wildland-urban interface increase both the likelihood of future wildfires and communities’ exposure to those hazards. Approximately 85 percent of all fire ignitions in California are the result of human activity, with the rest due to lightning.

Verisk’s most-recently updated *FireLine Risk Report*, which analyzes wildfire risk to residential structures by examining principal factors like flammable vegetation, topography, fire response infrastructure, and wind patterns, shows that 2 million housing units—15 percent of the state’s total—are at high and extreme risk of wildfire. Another 1.6 million, or 12 percent, are at moderate risk.⁶⁴

CAL FIRE and the Office of the State Fire Marshal produce maps to show areas with significant fire hazards based on local fuels, terrain, weather, and other factors. These maps impact requirements for clearance and property development standards and new construction, as well as influence risk determinations on properties that are within Fire Hazard Severity Zones. Maps also include State Responsibility Areas that CAL FIRE oversees, and give a hazard score of moderate, high, and very-high based on based on a number of factors that influence fire likelihood and fire behavior (i.e., fire history, fuel levels, terrain, and weather). The figure below shows the most recent Fire Hazard Severity Zones for state responsibility areas.

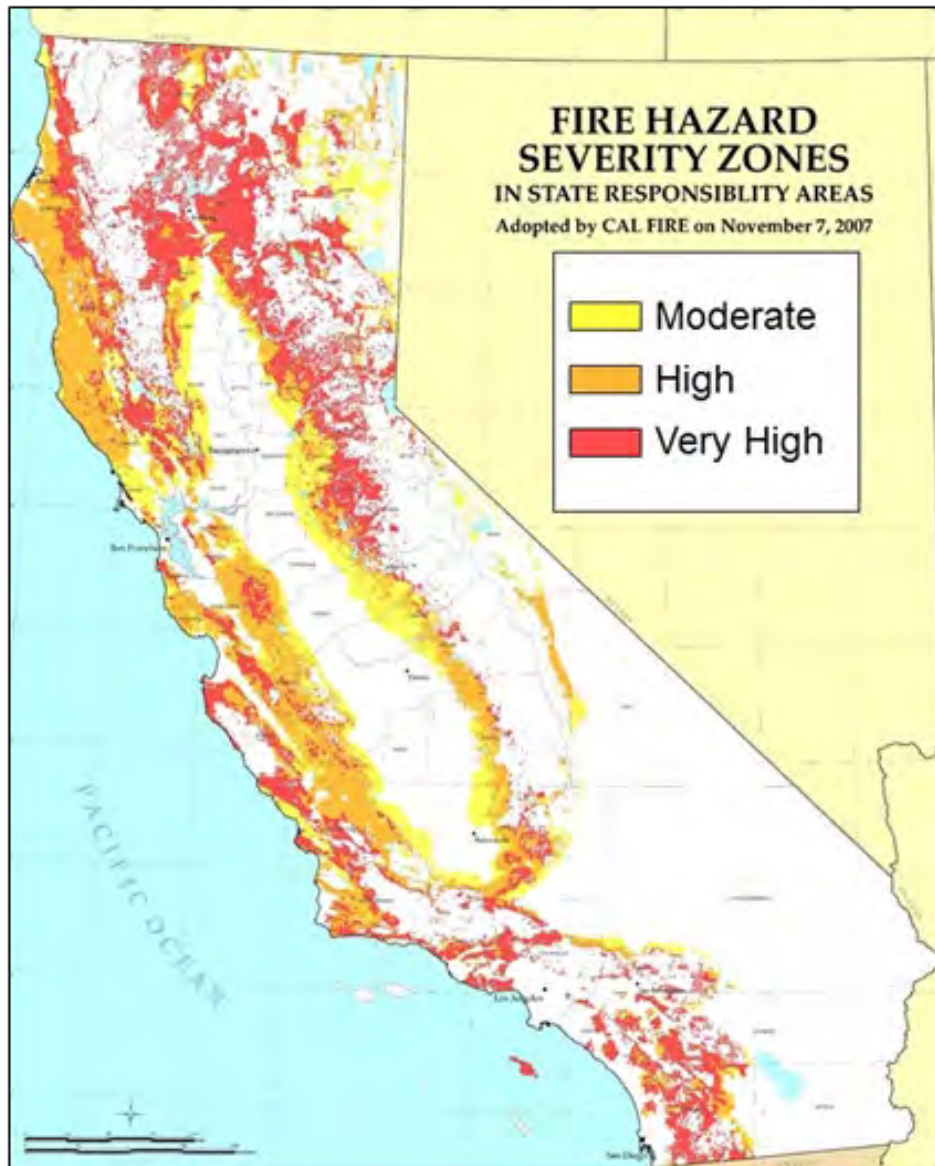
⁶² California Drought Update (December 2021),” California Drought Action (State of California / Cal OES, December 13, 2021), https://drought.ca.gov/media/2021/12/CA_Drought_Update_12-13-21.pdf.

⁶³ “2022 Fire Season Outlook,” CAL FIRE Department of Forestry and Fire Protection (CAL FIRE), n.d., <https://bit.ly/3MCPZol>.

⁶⁴ Dr. Arindam Samanta, “Verisk 2021 Wildfire Risk Analysis Provides Updated Data on Rising Threat,” Verisk, October 13, 2021, <https://www.verisk.com/insurance/visualize/verisk-2021-wildfire-risk-analysis-provides-updated-data-on-rising-threat/>.

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FIGURE 116: FIRE HAZARD SEVERITY ZONES IN STATE RESPONSIBILITY AREAS



Source: State of California and the Department of Forestry and Fire Protection, 2007,
https://osfm.fire.ca.gov/media/6636/fhszs_map.pdf

Wildfire Threat Areas

According to the 2018 SHMP, fire threat is a combination of two factors, fire frequency, or likelihood of a given area burning and potential fire behavior. The map below highlights the extent of high, very high, and extreme wildfire threat areas across the state, including areas impacted by the 2020 and 2021 fires.

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FIGURE 117: WILDFIRE THREAT AREAS



Source: California Department of Forestry and Fire Protection, Fire and Resource Assessment Program, Fire Threat. 2019. Available at <https://www.fire.ca.gov/what-we-do/fire-resource-assessment-program>

Climate Change and Wildfire Hazard

While wildfires are caused and exacerbated by complex interacting factors, global climate change is driving the conditions that increase the frequency and severity of major fire disasters like those in 2017, 2020, and 2021. Climate change alters wildfire hazards in frequency, size, and severity - often beyond the historic range - by lengthening the fire season, drying vegetation, decreasing forest health, and altering ignition patterns.

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According to the State of California's Climate Adaptation Strategy, significant shifts in temperature, precipitation, flooding, and erosion in the state have all contributed to recent record-breaking wildfire seasons. The average annual temperature in most of California rises 1-2 °F each year and is expected to rise 4.4°F–5.8°F by mid-century and 5.6°F–8.8°F by 2100. Consequently, warming air temperatures will increase moisture loss from soils, which will lead to drier seasonal conditions even if precipitation increases. Even if today's precipitation levels remain stable, California's critical mountain snowpacks, which replenish surface and groundwater in the state, are projected to decline by more than 30 percent by 2050.⁶⁵

The impact of climate change on wildfire hazards grew starkly apparent as a series of escalating wildfire seasons pummeled the state over the last several years. The 2020 wildfire season was the largest recorded season in the state's modern history and featured some of the most destructive single incidents on record, as fewer than 40 of the nearly 10,000 fires accounted for the vast majority of burned acreage. The 2021 wildfire season included four of the 20 largest wildfires in history and marks the first time that fire crossed the granite crest of the Sierra, California's largest natural fuel break.⁶⁶

Wildland fire also has secondary impacts, in the form of air pollution and soil erosion, resulting in increased siltation in streams and lakes, or mudslides. Areas decimated by fire experience increases in runoff during rainstorms when vegetation is no longer available to stabilize absorbent soil. Resulting erosion contributes to mudslides in the immediate area, and rivers and lakes receive displaced soil and debris as runoff washes downstream. Winds that feed fires also carry ash and smoke over large areas of the state, often creating hazardous breathing conditions that can aggravate respiratory conditions or be dangerous with prolonged exposure.

These trends are expected to continue. California's Fourth Climate Change Assessment projected up to a 77 percent increase in average area burned by wildfires and a 50 percent increase in the frequency of fires exceeding 25,000 acres by 2100.⁶⁷ Fortunately, the state has redoubled proactive efforts to recover from and mitigate the effects of climate change on California's worsening fire seasons.

Climate Change

Climate change is related to changes in climatological conditions that result from increased greenhouse gas (GHG) concentrations in the atmosphere which are linked to an increase in average global temperature. According to the National Oceanic and Atmospheric Administration (NOAA) Earth System Research Laboratory Trends in Atmospheric Carbon Dioxide, monthly GHG levels now exceed 400 parts per million (ppm) for the first time in recorded history. Increased GHG emissions and global average temperature result in changes to the global climate shifts in seasonal temperature patterns, changes in precipitation amount, timing and location, sea-level rise, ocean acidification due to increased carbon dioxide (CO₂) absorption,

⁶⁵ "Summary of Projected Climate Change Impacts on California," California Climate Adaptation Strategy (State of California, 2021), <https://climateresilience.ca.gov/overview/impacts.html>.

⁶⁶ Ibid.

⁶⁷ "California's Fourth Climate Change Assessment," California Climate Assessment (State of California, August 2018), <https://climateassessment.ca.gov/>.

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altered wind and storm event frequency, severity, and location. These climatological changes result in prolonged drought, increased coastal flooding and erosion, tree mortality, increase in average temperatures (more extreme heat days, fewer cold nights), shifts in the water cycle with less annual snow fall, and more snowmelt and rainwater running off sooner in the year. As a result, California continues to experience increased extreme weather events and hazards, most recent examples being heat waves, wildfires, droughts, and floods.

Impacts from climate change are considered secondary hazards in the Mitigation Needs Assessment. Extreme temperatures and increased or decreased precipitation create the conditions for more intense fires, flooding, and landslides. These weather events have the potential to cause injuries or fatalities, environmental damage, property damage, infrastructure damage, and interruption of operations. Examples of specific types of impacts include softening of asphalt roads and warping of railroad rails, damage to roads, flooding of roadways, rail routes, and airports from extreme events, and interruptions to flight plans due to severe weather.

As a result of the increase in climate augmented extreme weather events and hazards, California Executive Order S-03-05 created the California Climate Change Assessment Program. The program executes scientific assessments on the potential impacts of climate change in California and reports potential climate adaptation responses.

The first assessment was completed and released in 2006 and concentrated on the effects of climate change on critical state resources including water supply, public health, agriculture, coastal areas, forestry, and electricity production/demand. The second assessment, released in 2009, provides estimates of the economic impacts of climate change on the state. The third assessment released in 2012 came as a result of requests for more information regarding vulnerability and adaptation options discussed in the 2009 California Adaptation Strategy. The fourth and most recent assessment is tied to California's comprehensive strategy to act on cutting edge climate research. The fourth assessment seeks to provide improved vulnerability assessments based on more in-depth understandings of projected weather extremes, and reports on scientific results that can support action, especially if greenhouse gas emissions continue to rise.

The state must prepare for a changing climate and increased threat of frequent and extreme weather events. Verisk Analytics gauged the risk to residential properties in California and found "more than 2,000,000 homes – about 15 percent of all housing units in the state – have a high to extreme risk of wildfire damage. In seven counties, mostly in Northern California, more than two-thirds of all homes were in jeopardy."

Environmental Hazards

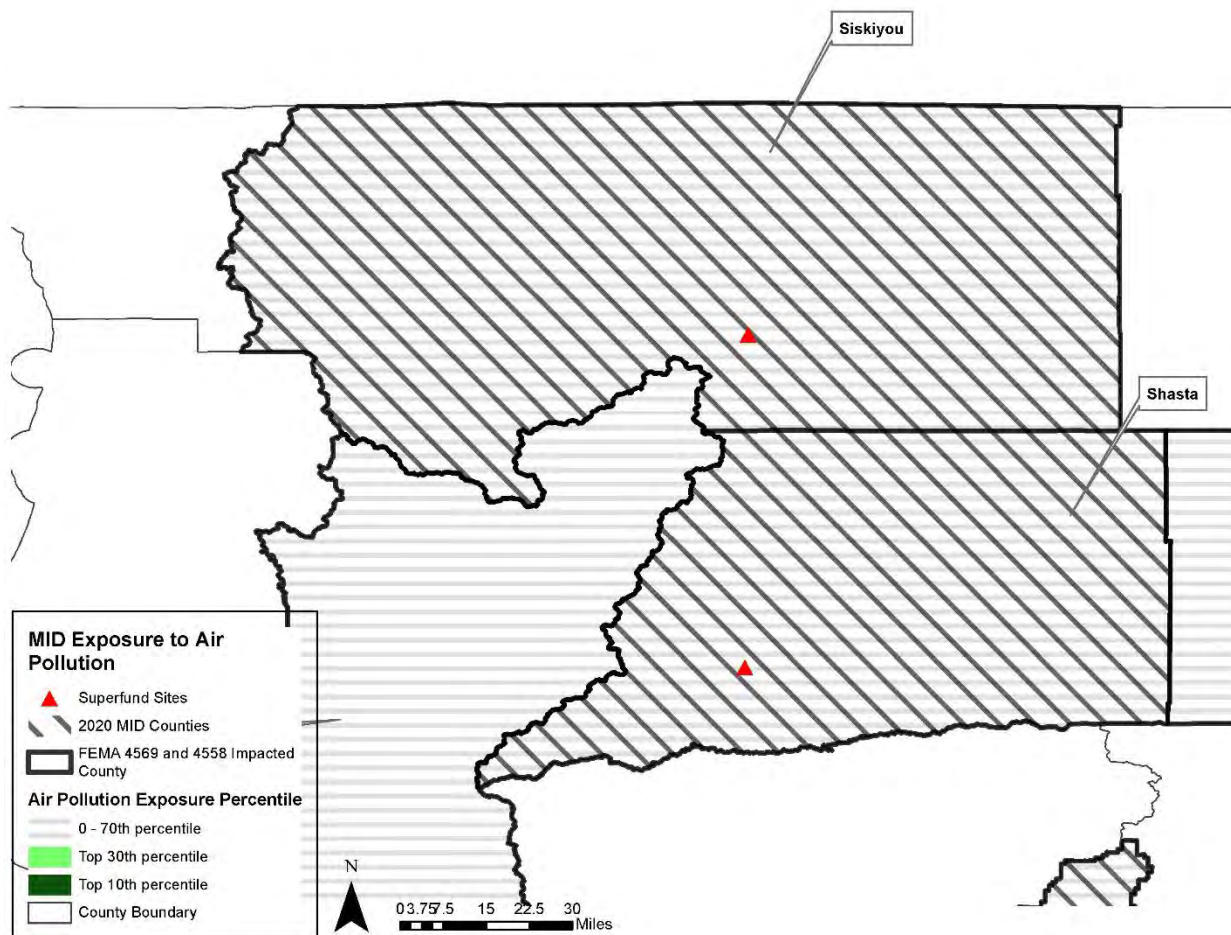
California has many manmade environmental hazards that effect human morbidity, mortality, and quality of life that can be magnified during disaster scenarios. These include pollution, hazardous waste cleanup sites, drinking water contaminants, etc.

The maps below show pollution in percentile in comparison to nationwide pollution around the most impacted and distressed areas. Pollution burden includes both exposures to ozone concentrations, traffic, pesticides, PM2.5 concentrations, diesel PM emissions, drinking water

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contaminants, children’s lead risk from housing, use of certain high-hazard, high volatility pesticides, and toxic releases from facilities. Black and Latino Californians both disproportionately reside in high pollution burden areas and are disproportionately impacted by high pollution burdens. Pollution not only leads to major health issues like asthma, cancer, low birth weight, cardiovascular disease, etc. but also limits peoples’ abilities to make use of ecosystem resources.⁶⁸ The below maps show that Los Angeles is the MID with the most air pollution with most of the southern part of the county in the nationwide top 30th percentile for air pollution. The maps below also show the locations of superfund sites which are polluted locations in the United States requiring long term cleanup due to hazardous material contamination.

FIGURE 118: AIR POLLUTION MID - NORTHERN CA - 2020

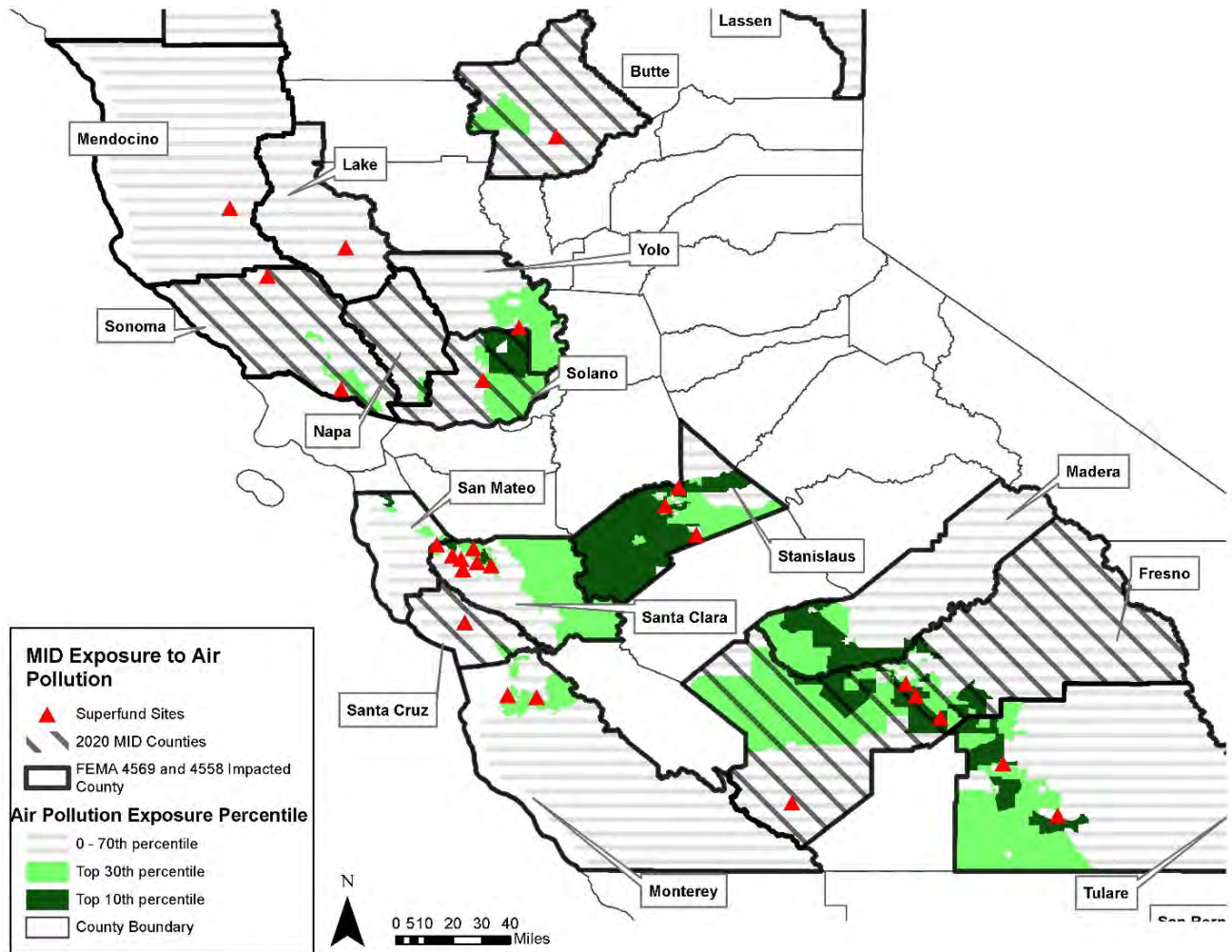


Source: CalEnviroScreen 4.0, ESRI

⁶⁸ Laura August, “CalEnviroScreen 4.0,” EnviroScreen (California Office of Environmental Health Hazard Assessment, 2021), <https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf>.

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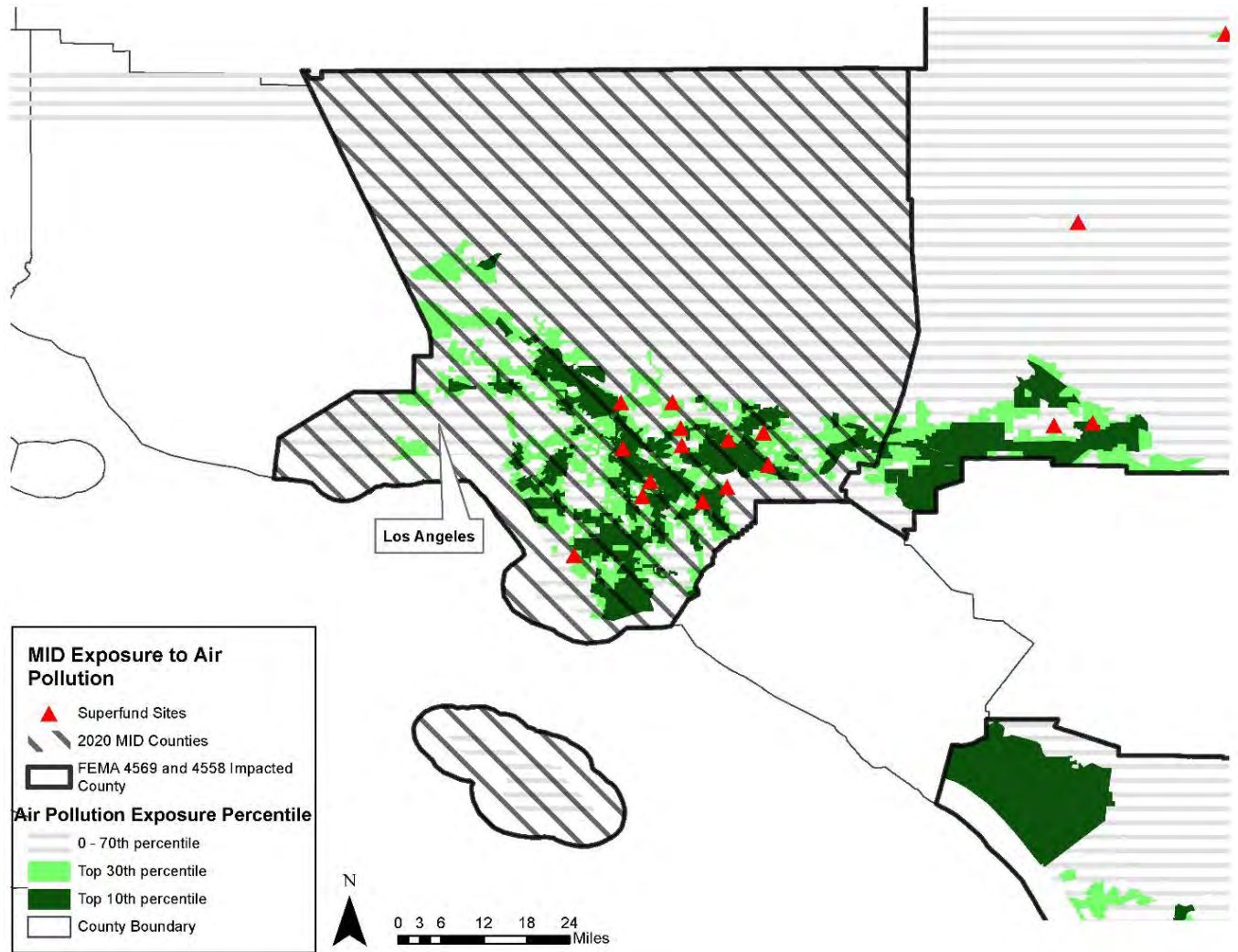
FIGURE 119: AIR POLLUTION MID - CENTRAL CA - 2020



Source: CalEnviroScreen 4.0, ESRI

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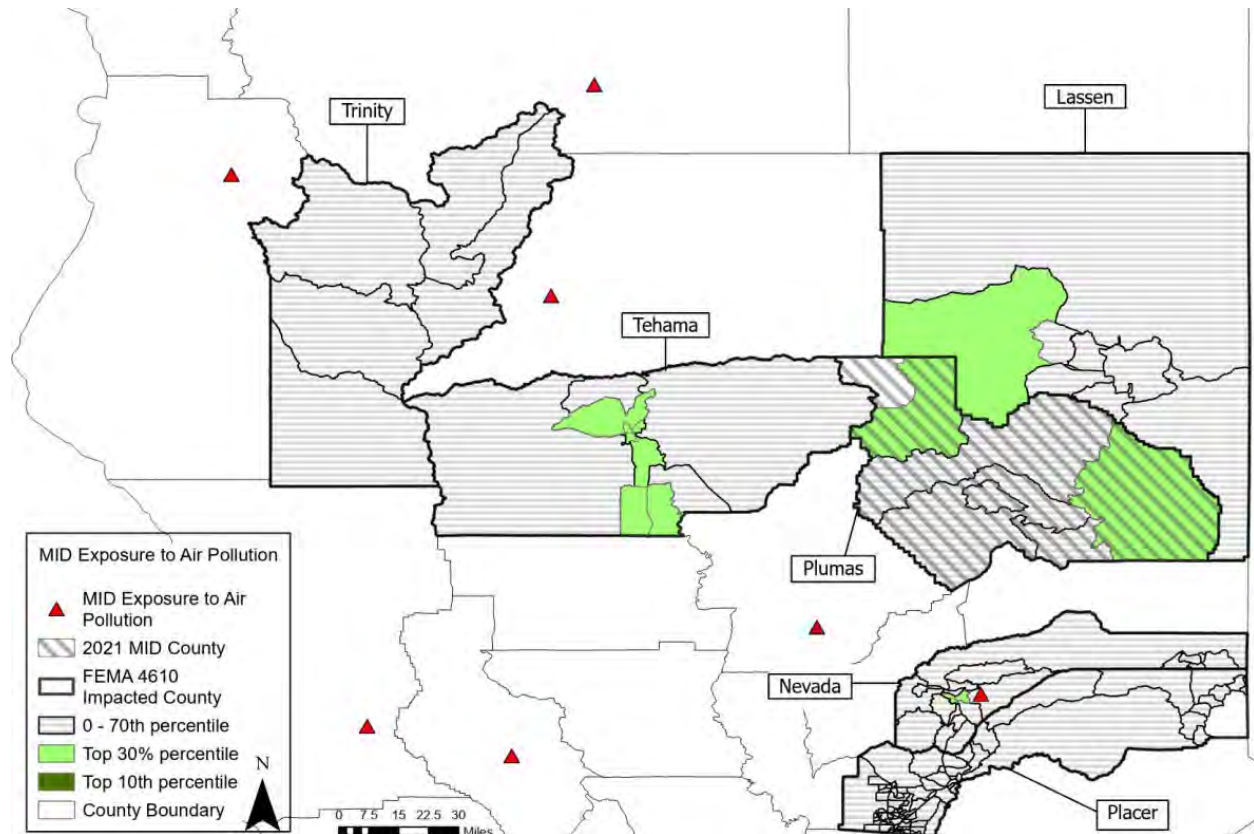
FIGURE 120: AIR POLLUTION MID - LOS ANGELES - 2020



Source: CalEnviroScreen 4.0, ESRI

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FIGURE 121: AIR POLLUTION MID – NORTHERN CALIFORNIA - 2021



Source: CalEnviroScreen 4.0, ESRI

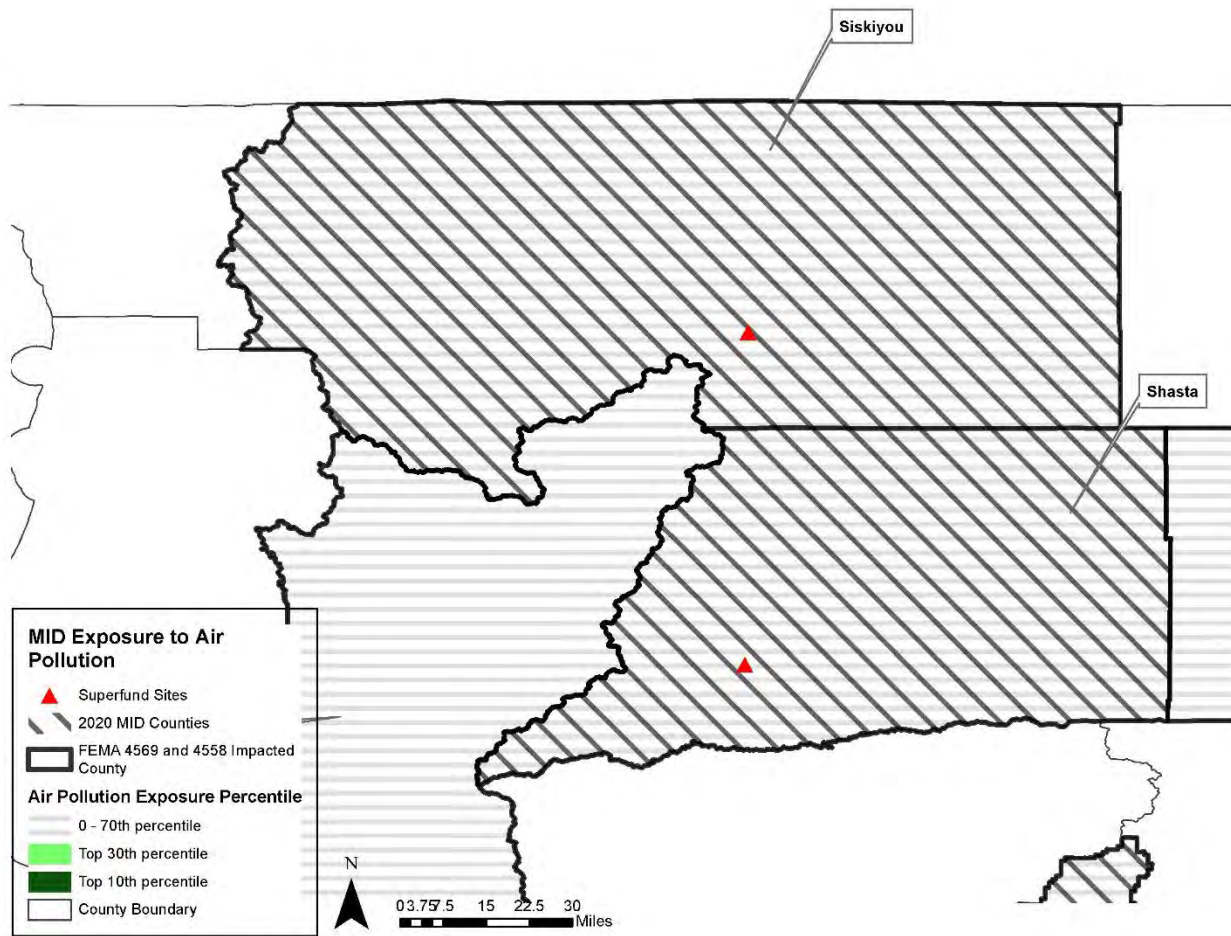
The below maps outline cleanup sites in California. These can include superfund sites which are shown by location in each map but also lesser “brownfield” sites. Superfund sites are contaminated sites in which the federal government is involved in the cleanup, while the less risky brownfields usually have only tribal, or state government involved in the cleanup⁶⁹ Proximity to superfund sites increases the prevalence of low-birth-weight children, liver disease, elevated blood lead levels in children, and cognitive and behavioral problems in children.⁷⁰ The maps below show that Siskiyou, Butte, and Los Angeles all have significant portions of the county exposed to cleanup sites.

⁶⁹ “Types of Contaminated Sites,” Enforcement (Environmental Protection Agency, April 19, 2016), https://19january2017snapshot.epa.gov/enforcement/types-contaminated-sites_.html.

⁷⁰ California Office of Environmental Health Hazard Assessment, (2021), “CalEnviroScreen 4.0,” (2021).

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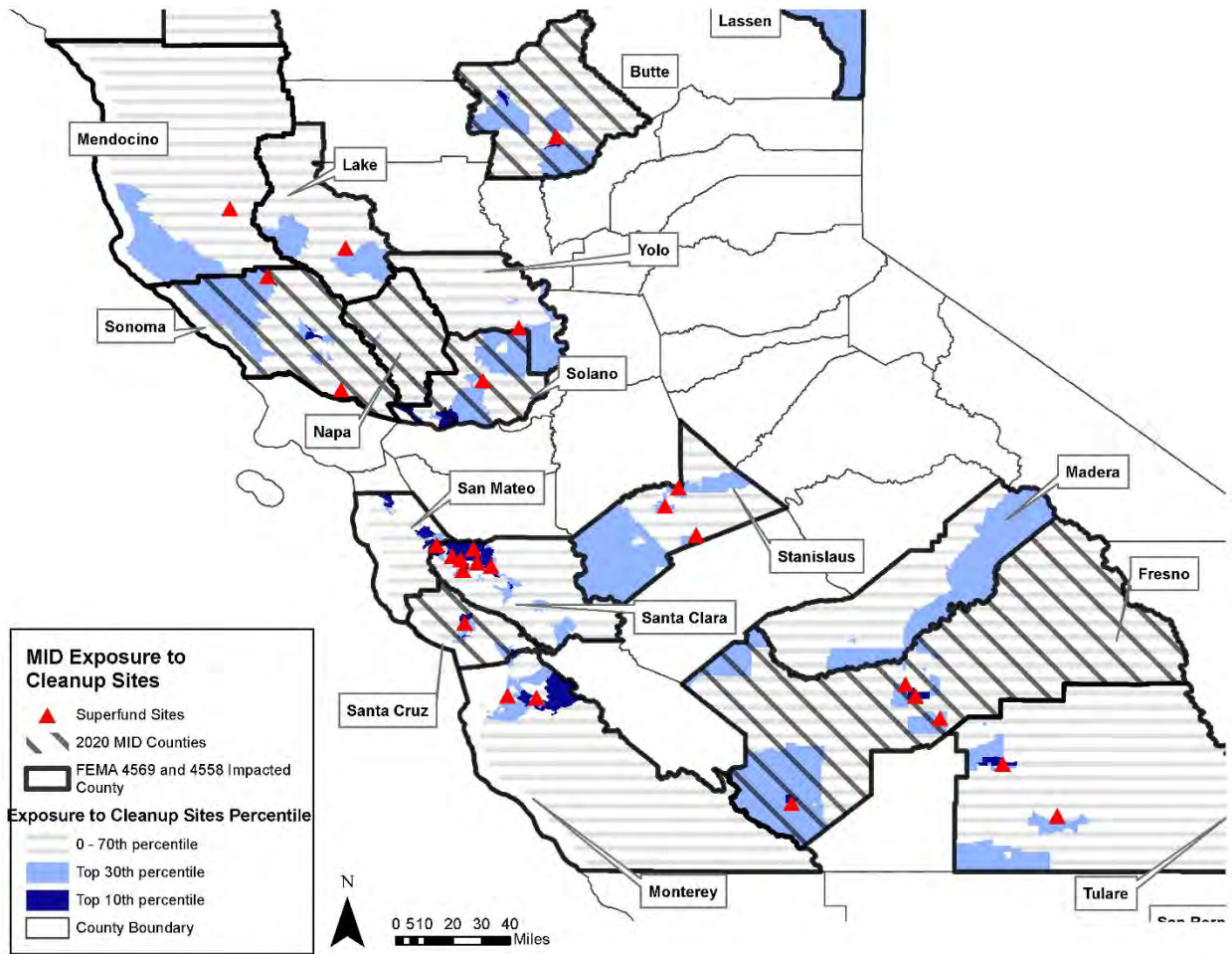
FIGURE 122: EXPOSURE TO CLEANUP SITES MID - NORTHERN CA - 2020



Source: CalEnviroScreen 4.0, ESRI

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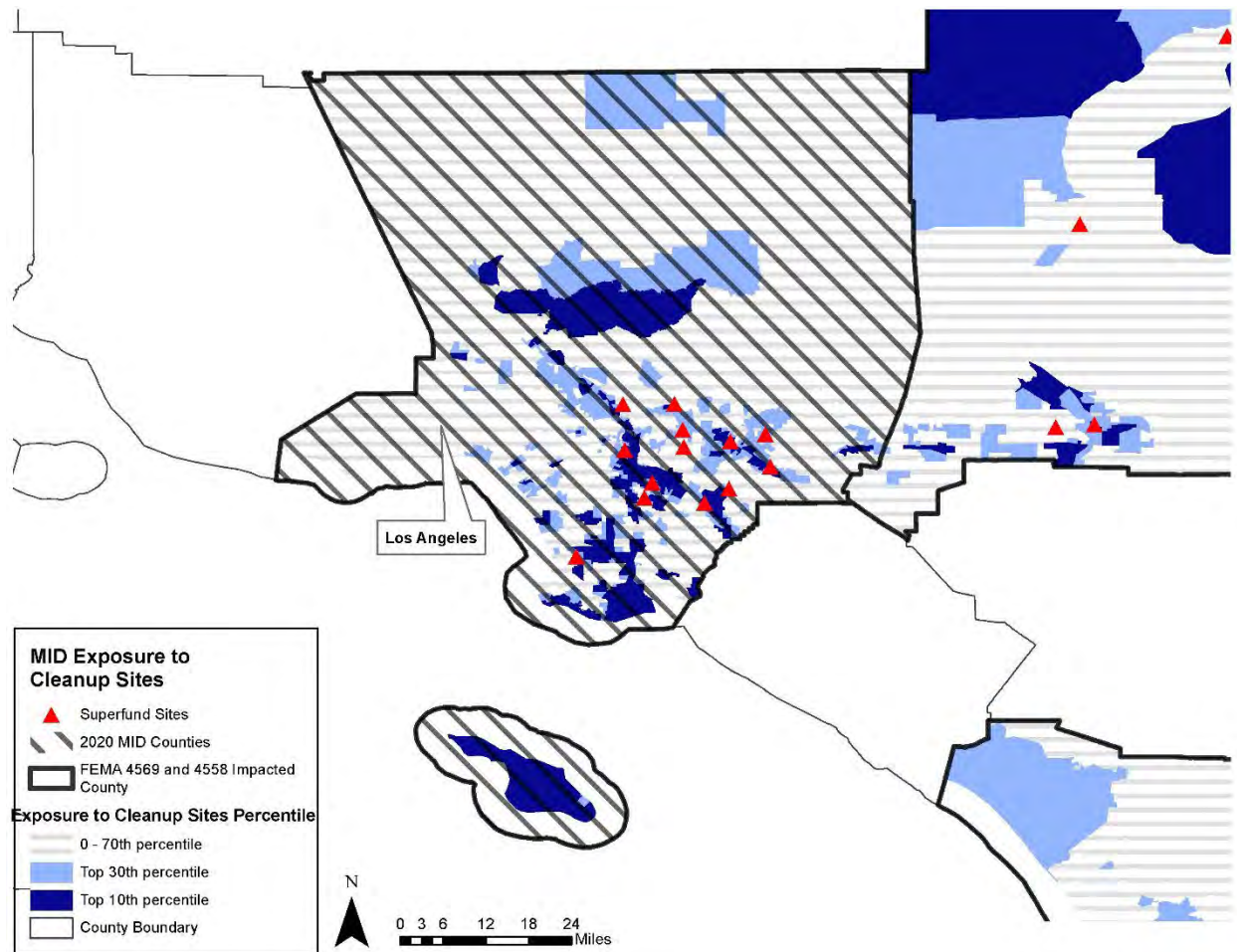
FIGURE 123: EXPOSURE TO CLEANUP SITES MID - CENTRAL CA



Source: CalEnviroScreen 4.0, ESRI

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FIGURE 124: EXPOSURE TO CLEANUP SITES MID - LOS ANGELES



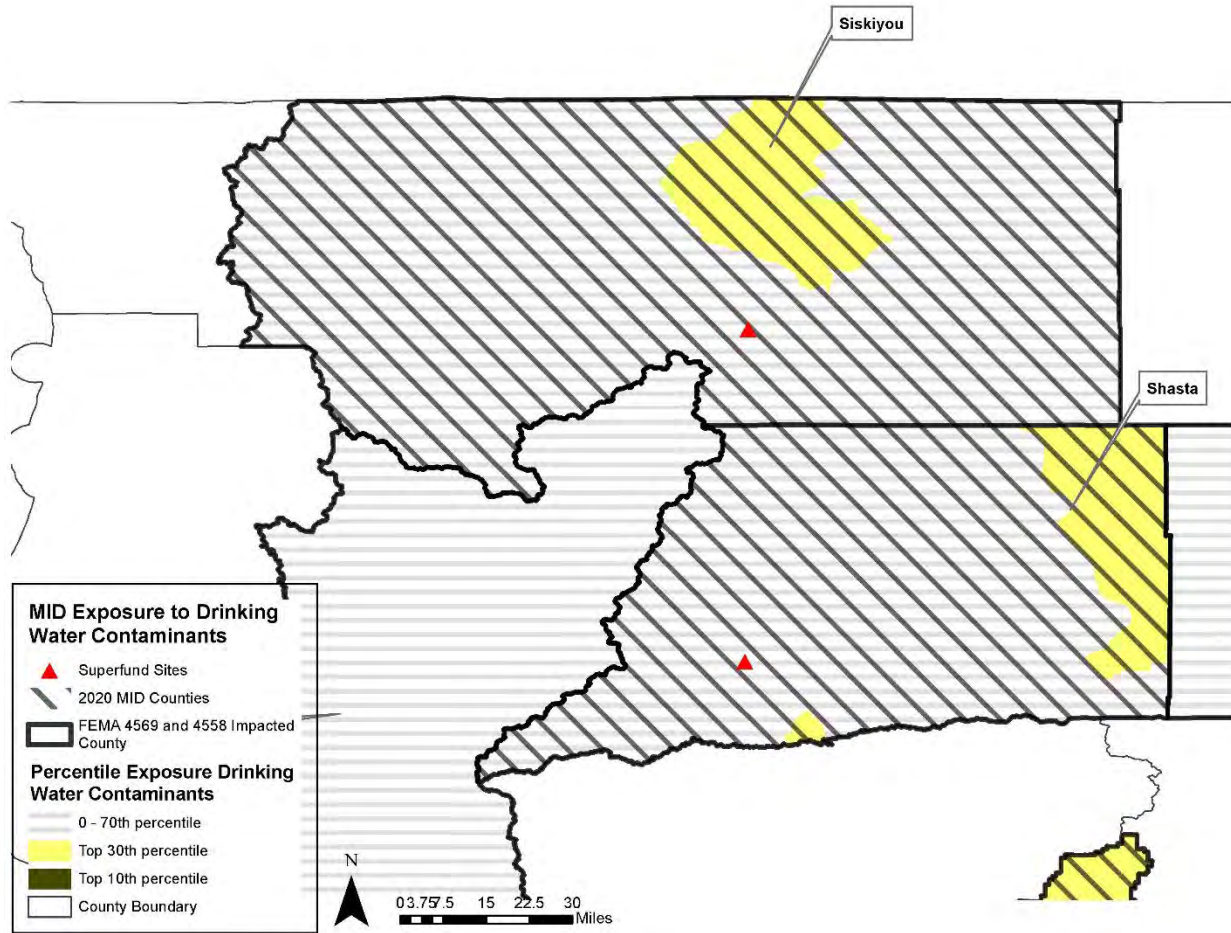
Source: CalEnviroScreen 4.0, ESRI

The maps below show drinking water contaminants in the Most Impacted and Distressed counties. Both drinking water sources and quality vary around the state, with low income and rural communities often being disproportionately exposed to contaminants in drinking water. Drinking water contamination often includes nitrate from fertilizer or animal waste that leeches into groundwater, perchlorate – a groundwater contaminant that effects thyroid hormone levels, arsenic – a known carcinogen, lead from house pipes and fixtures, and other microbial contaminations from poorly treated water.⁷¹ The maps below show that every Most Impacted and Distressed County has a significant area that is in the top 30th percentile of most drinking water contaminants.

⁷¹ Ibid.

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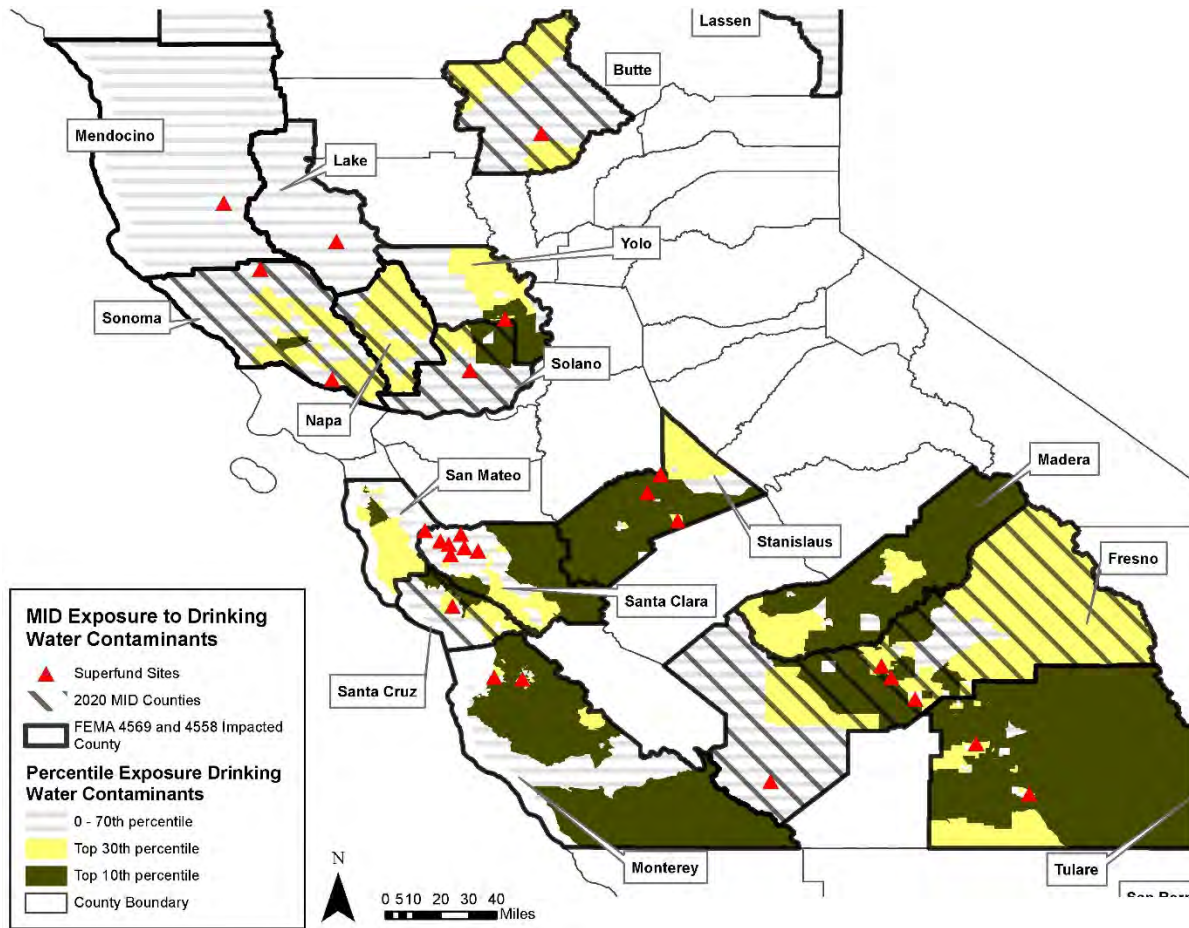
FIGURE 125: DRINKING WATER CONTAMINANTS MID - NORTHERN CA



Source: CalEnviroScreen 4.0, ESRI

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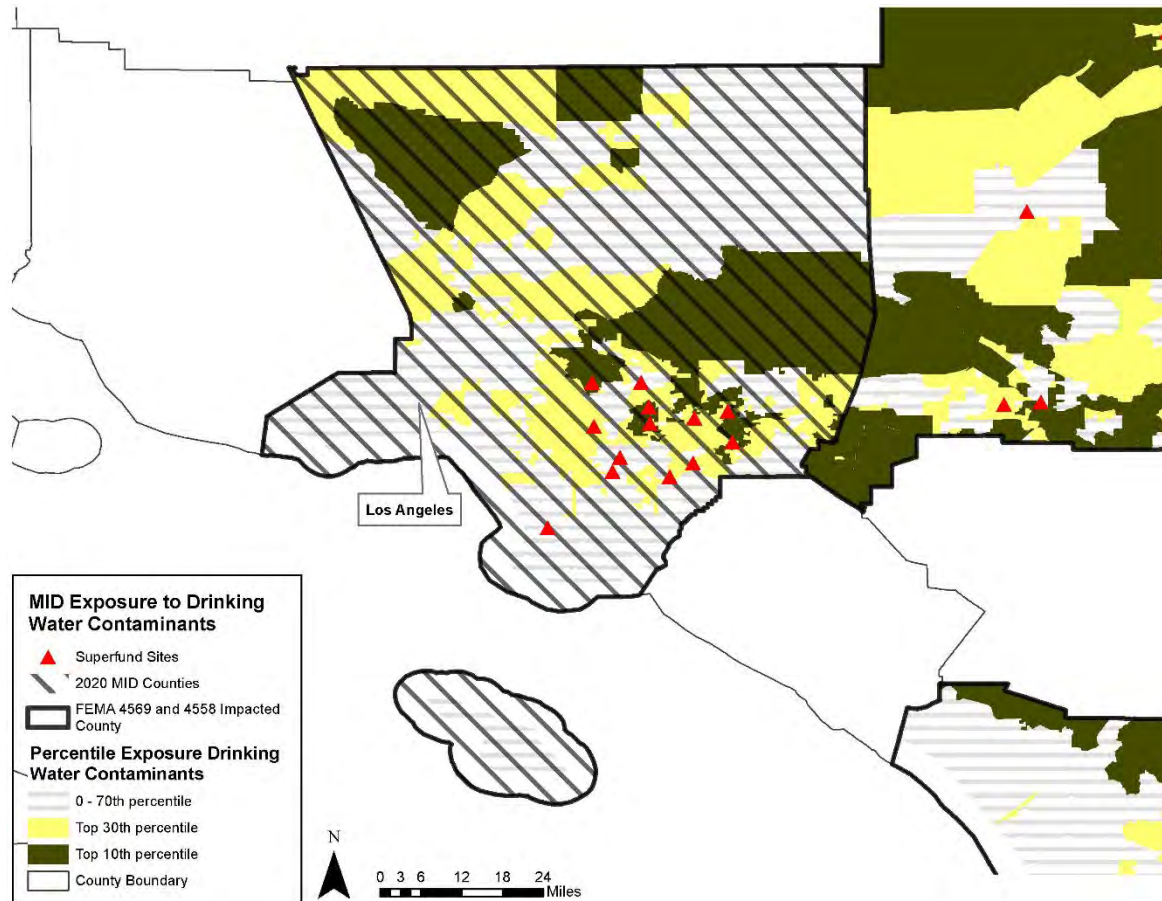
FIGURE 126: DRINKING WATER CONTAMINANTS MID - CENTRAL CA



Source: CalEnviroScreen 4.0, ESRI

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FIGURE 127: DRINKING WATER CONTAMINANTS MID - LOS ANGELES

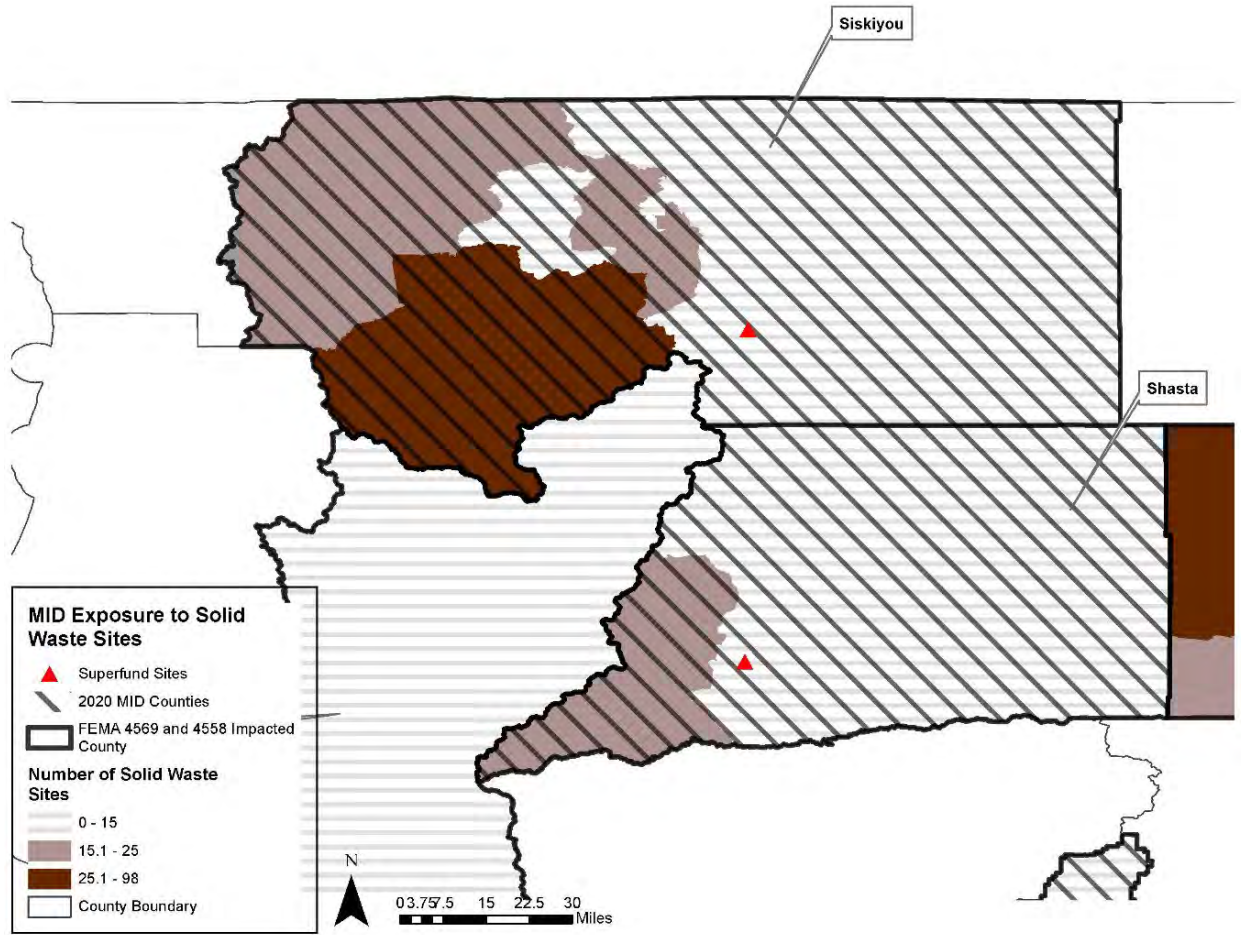


Source: CalEnviroScreen 4.0, ESRI

The below maps illustrate proximity to solid waste sites, operations, and facilities. Proximity to solid waste sites can increase the risks of air, water, and soil contamination as well as concerns about odors, vermin, and increased truck traffic. Although many newer sites are made to reduce the contamination risks, old, closed sites are monitored less frequently and can degrade the environment including leaching to nearby plants and animals. The maps below show that Siskiyou, Monterey, and Los Angeles all have more than 25 waste sites in one of the county census tracts.

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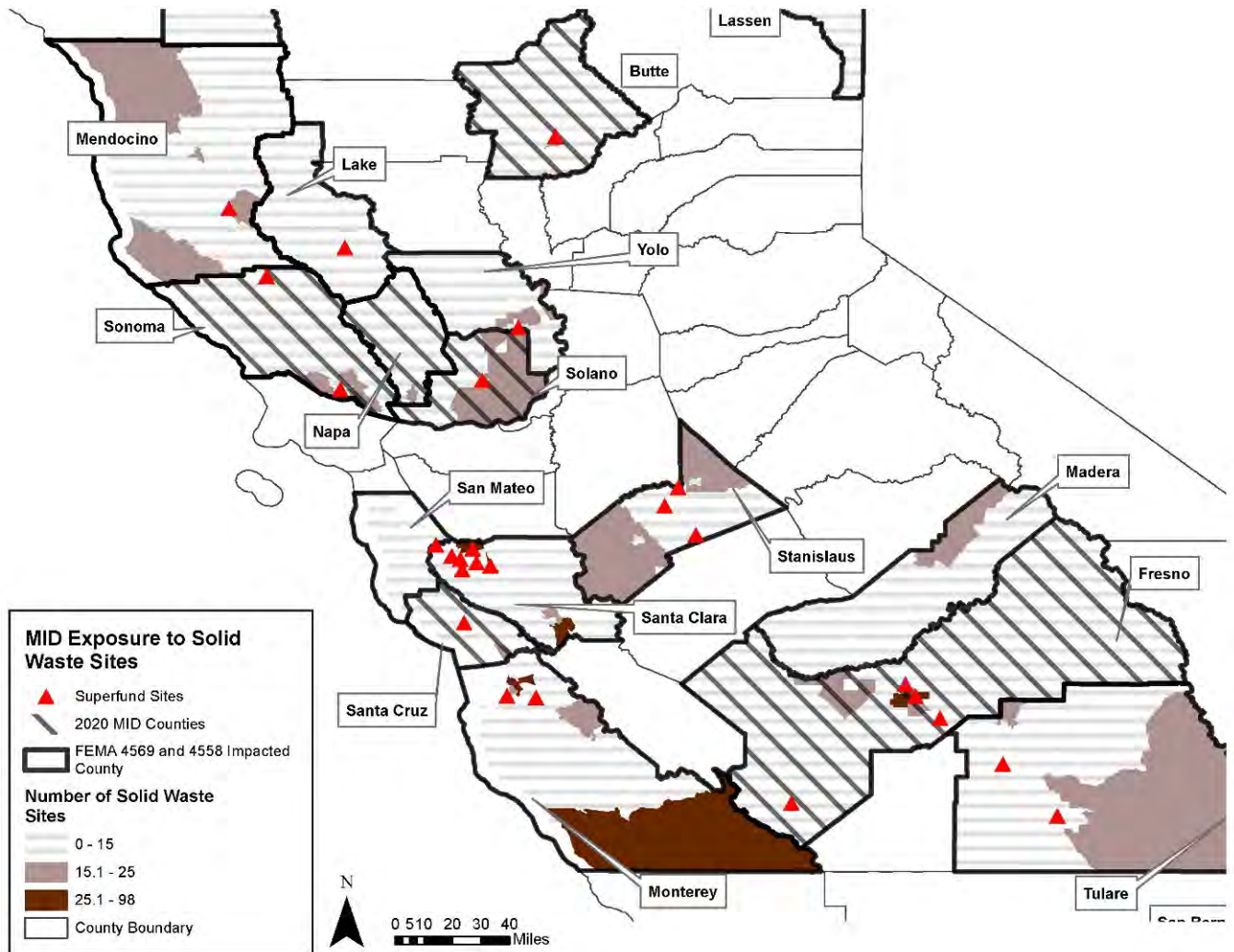
FIGURE 128: SOLID WASTE SITES MID - NORTHERN CA



Source: CalEnviroScreen 4.0, ESRI

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FIGURE 129: SOLID WASTE SITES MID - CENTRAL CA



Source: CalEnviroScreen 4.0, ESRI

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FIGURE 130: SOLID WASTE SITES MID - LOS ANGELES



Source: CalEnviroScreen 4.0, ESRI

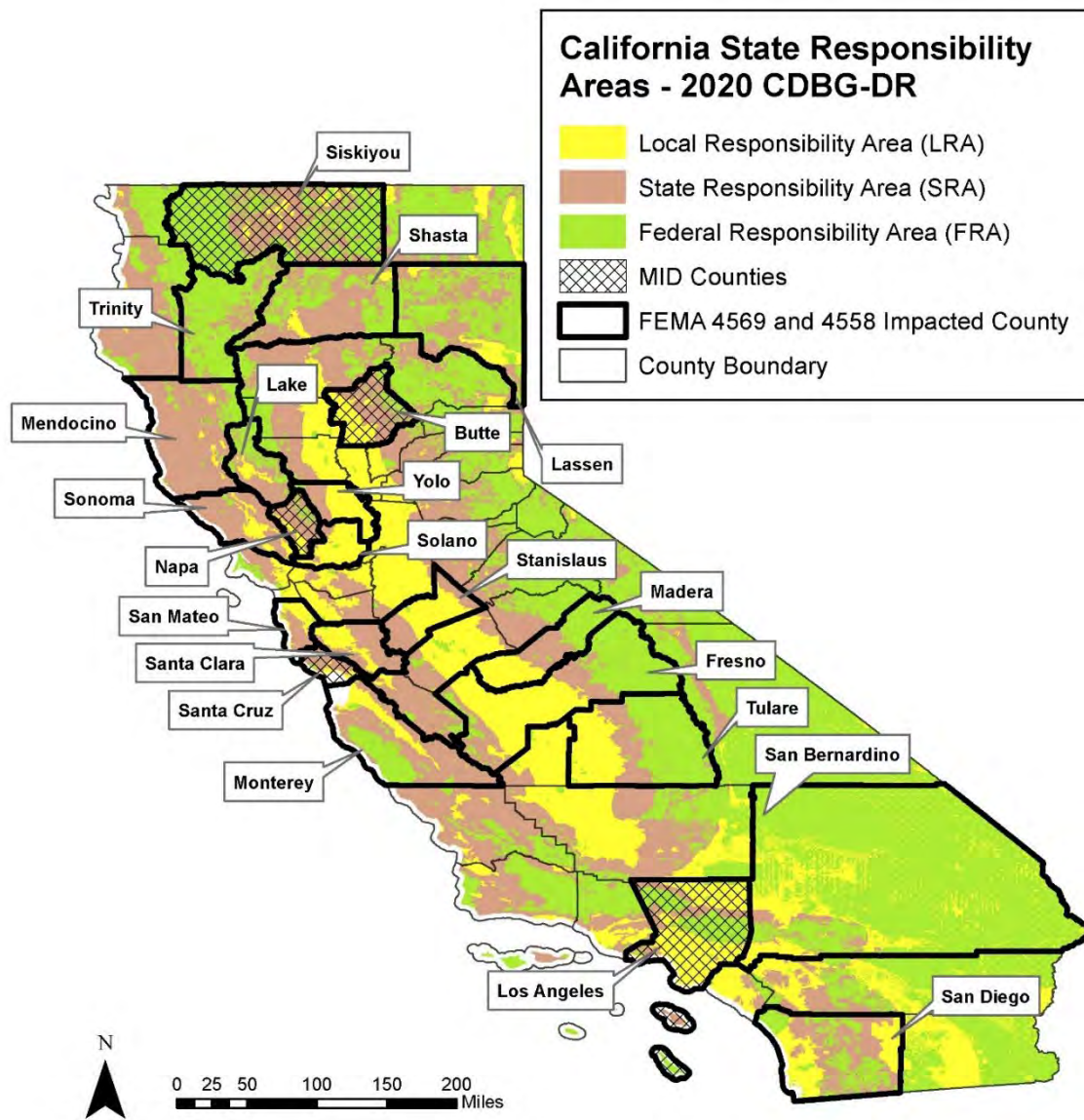
The below maps illustrate proximity to solid waste sites, operations, and facilities. Proximity to solid waste sites can increase the risks of air, water, and soil contamination as well as concerns about odors, vermin, and increased truck traffic. Although many newer sites are made to reduce the contamination risks, old, closed sites are monitored less frequently and can degrade the environment including leaching to nearby plants and animals. The maps below show that Siskiyou, Monterey, and Los Angeles all have more than 25 waste sites in one of the county census tracts.

California Responsibility Areas

In California there are Local Responsibility Areas (LRA), Federal Responsibility Areas (FRA), and State Responsibility Areas (SRA), which are defined by legal and congressional jurisdictional boundaries. The figure below shows all three Responsibility Areas in the State of California by color coding. Within the responsibility areas are different agencies and organizations charged with the task of protecting and defending designated areas.

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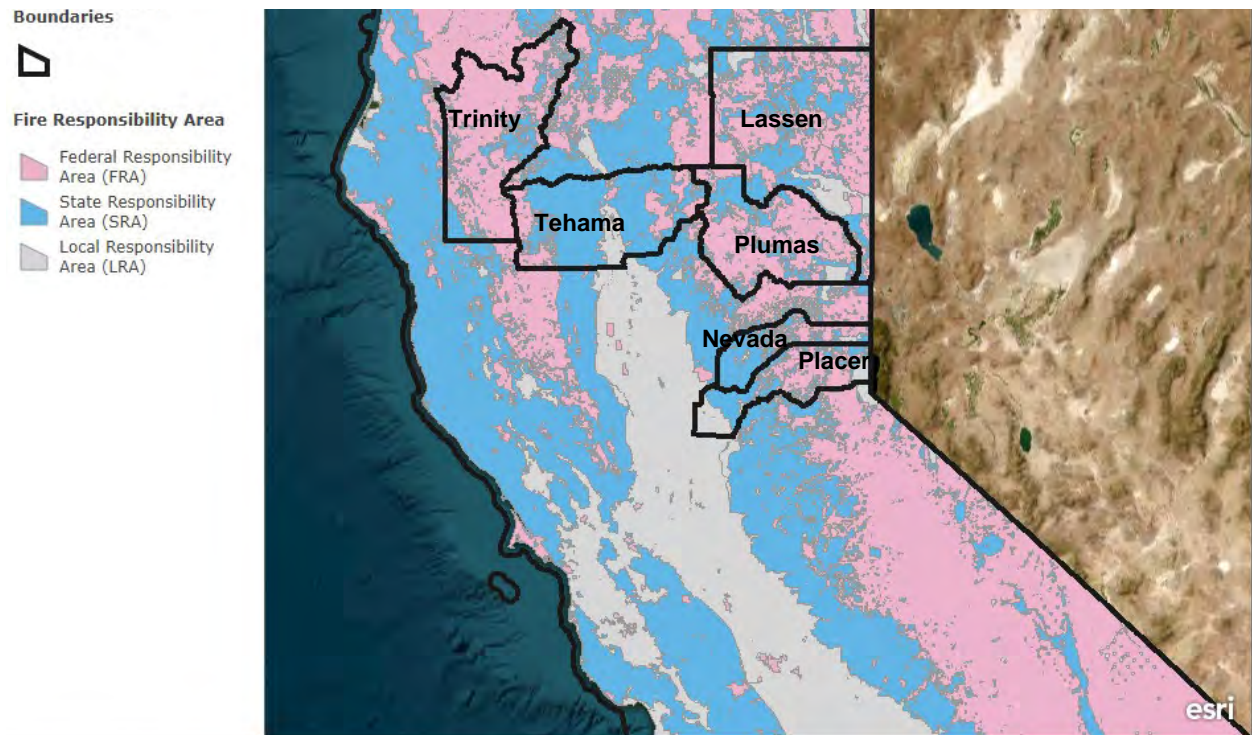
FIGURE 131: RESPONSIBILITY AREAS BY AGENCY - 2020



Source: California Department of Forestry and Fire Protection, 2017

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FIGURE 132: RESPONSIBILITY AREAS BY AGENCY - 2021



FRAP | Earthstar Geographics | Numerous federal agencies have provided data that help us to identify FRA lands (BLM, U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, Bureau of Indian Affairs).

The organizations include:

- *United States Forest Service (USFS)* - The mission of the USFS is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. In meeting its mission, the USFS manages and provides wildland fire protection on 18 national forests in California covering almost 21 million acres.
- *The Bureau of Land Management (BLM)* - The mission of the BLM is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. In meeting its mission, the BLM manages and protects over 15 million acres in California and provides wildland fire protection on almost 14 million acres.
- *The National Park Service (NPS)* - The mission of the NPS is to preserve the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. In meeting its mission, the NPS manages over 7.5 million acres in California.
- *U.S. Fish and Wildlife Service* - The U.S. Fish and Wildlife Service, working with others, is responsible for conserving, protecting, and enhancing fish and wildlife and their habitats for the continuing benefit of the American people through federal programs

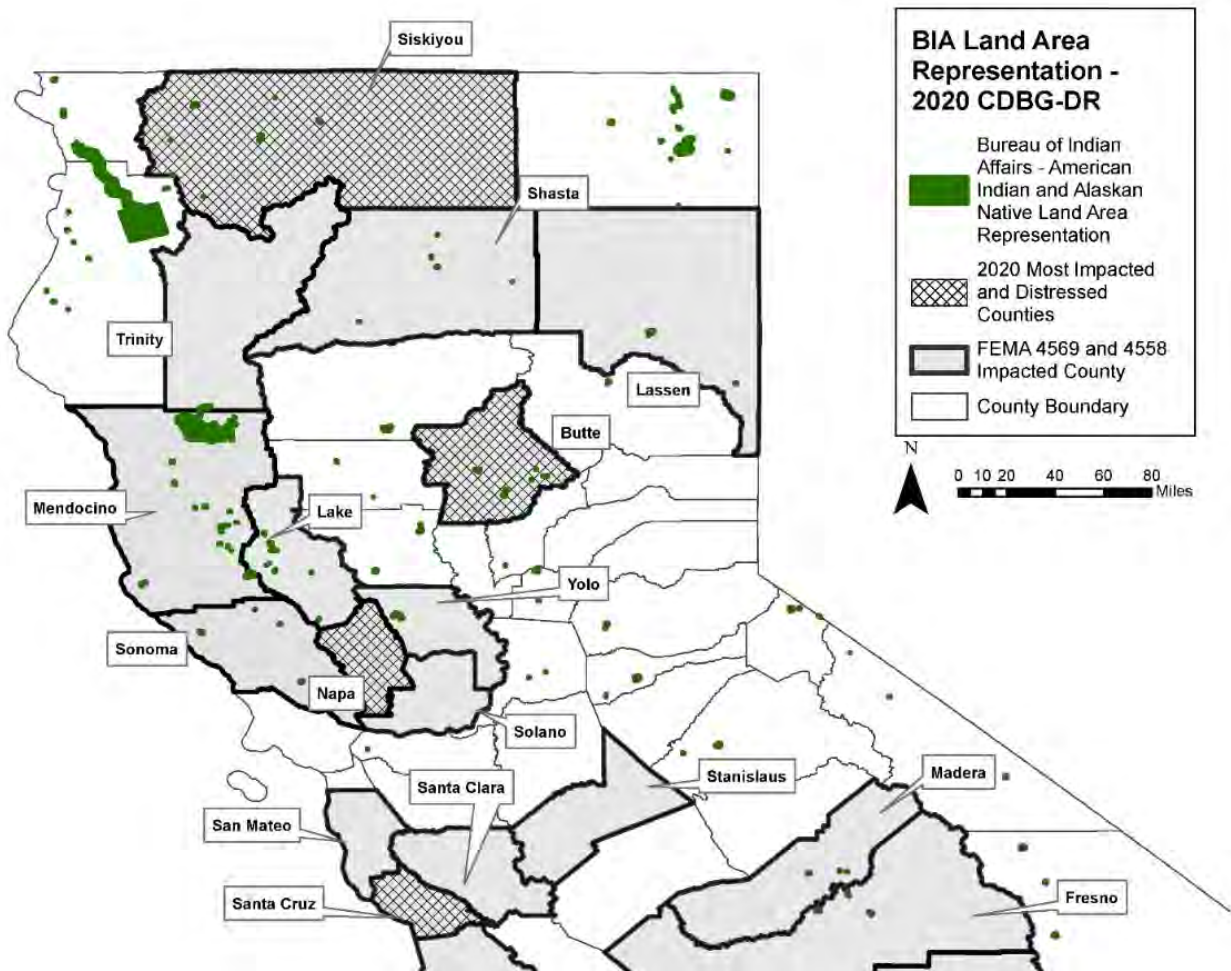
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relating to migratory birds, endangered species, interjurisdictional fish and marine mammals, and inland sport fisheries. In meeting its mission, the FWS is responsible for managing 34 National Wildlife Refuges in California, covering about 465,000 acres.

- *California Department of Forestry and Fire Protection (CAL FIRE)*- CAL FIRE is responsible for the wildland fire protection system in the state. The Board of Forestry has the authority to determine State Responsibility Areas (SRA) for private lands. These are lands for which CAL FIRE has wildland fire protection responsibility. All non-federal lands not assigned to an SRA are by default LRA. As a result, wildfire protection in California (approximately 90 million acres) is divided almost equally among CAL FIRE, local government, and the federal government.
- *The Bureau of Indian Affairs and Tribal Government (BIA)*- The Bureau of Indian Affairs' mission is to enhance the quality of life, to promote economic opportunity, and to carry out the responsibility to protect and improve the trust assets of American Indians, Indian tribes and Alaska Natives. The BIA is responsible for wildland fire protection on the other 103 reservation and rancherias. The BIA provides protection for tribal trust lands in Northern California, but contracts with CAL FIRE for the protection of scattered tribal trust lands in southern California. The following maps show the BIA recognized tribal governments in Northern and Southern California.

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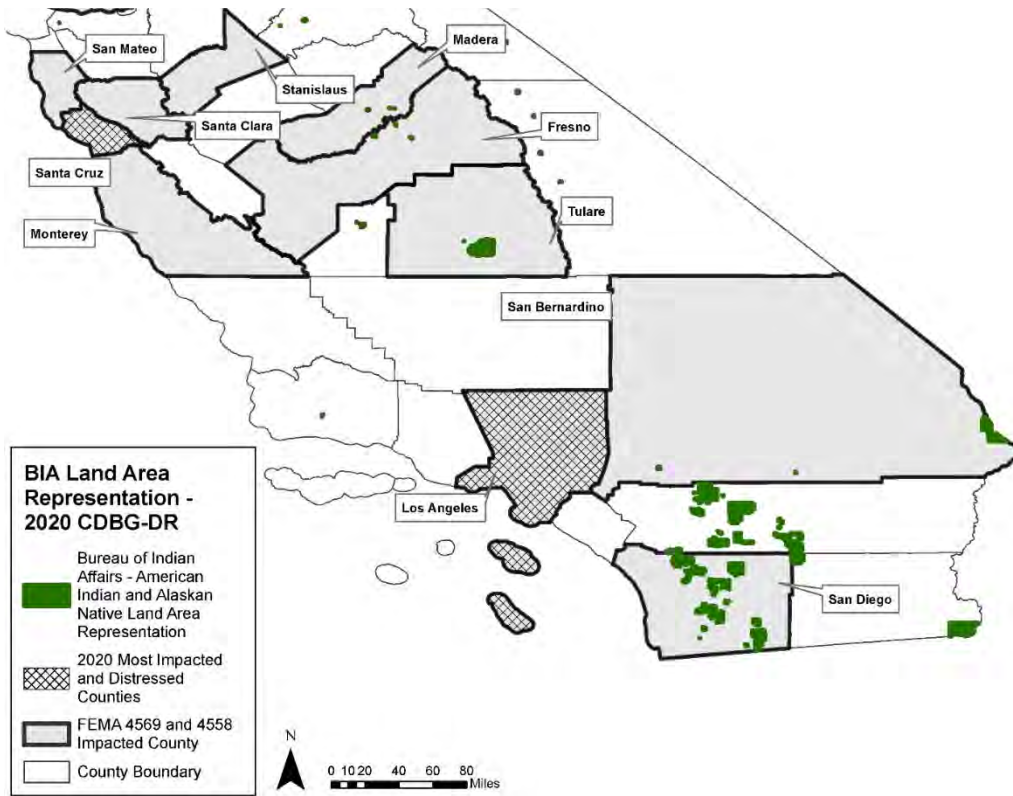
FIGURE 133: BIA LAND AREA REPRESENTATIONS - NORTHERN CA - 2020



Source: U.S. Department of the Interior Indian Affairs, <https://biamaps.doi.gov/bogs/datadownload.html>

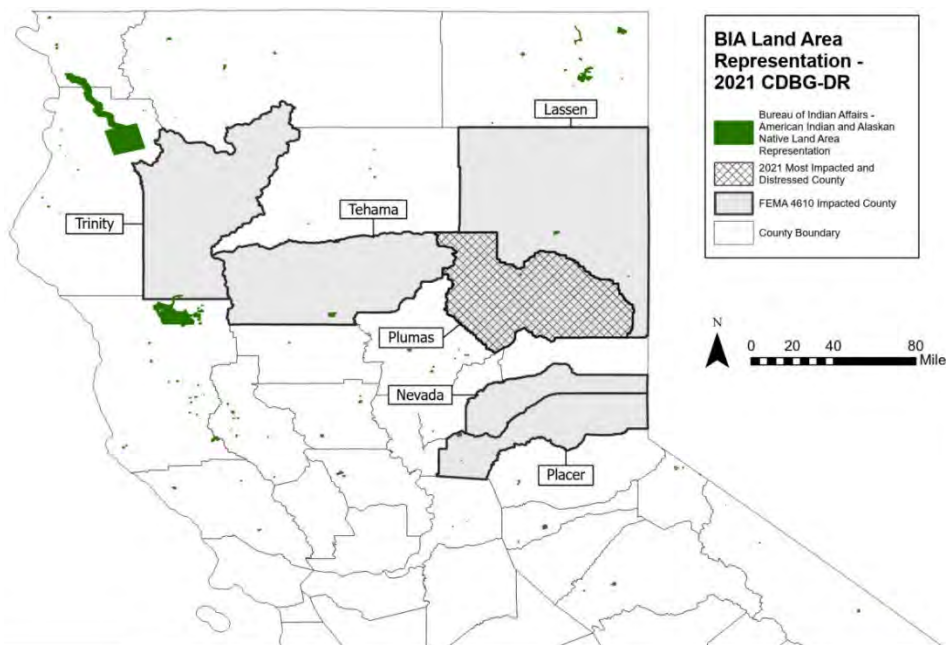
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FIGURE 134: BIA LAND AREA REPRESENTATIONS - SOUTHERN CA - 2020



Source: U.S. Department of the Interior Indian Affairs, <https://biamaps.doi.gov/bogs/datadownload.html>

FIGURE 135: BIA LAND AREA REPRESENTATIONS - 2021



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2.4.5 Local Hazard Mitigation Plans

California’s Local Hazard Mitigation Plans (LHMPs) provide critical hazard and risk information for each county in the state as well as actionable and localized mitigation approaches identified by its authors. The table below illustrates which hazards each MID county identified as threats to their jurisdiction in their most recent LHMP.

As seen below, the most commonly identified hazards in the areas designated as MIDs for DR-4558, DR-4569, and DR-4610 are wildfires, floods, and earthquakes. This consistency bolsters the SHMP’s state-wide hazard rankings and reinforces the prioritization of wildfire mitigation strategies in the state’s long-term recovery plan.

Flooding is also identified as a primary hazard as evidenced by the mudslides and debris flows. Although earthquakes are identified as a primary hazard, due to the nature of disasters that triggered the funding, the focus of the mitigation approaches will be on wildfires and, where applicable, flooding.

FIGURE 136: LOCAL HAZARD MITIGATION PLANS - TOP HAZARDS

Hazard Mitigation Plans	Butte - 2019	Fresno 2018	Lake - 2018	Lassen - 2018	Los Angeles - 2019	Madera - 2017	Mendocino - 2014	Monterey 2016 (2022)	Napa - 2013	San Bernardino - 2017	Santa Clara - 2017	Santa Cruz - 2021	San Diego - 2017	Santa Barbara - 2017	San Mateo - 2021	Shasta - 2010	Siskiyou - 2019	Solano - 2021	Sonoma - 2017	Stanislaus - 2017	Trinity - 2016	Tulare - 2018	Ventura - 2015	Yolo - 2018	Placer - 2021	Plumas - 2020	Nevada - 2017	Tehama - 2018	
Agricultural Pest/Invasive species		x	x			x																							
Dam Failure	x	x									x					x	x				x								
Climate Change	x		x		x	x					x			x				x	x			x	x	x					
Earthquake					x		x	x	x	x	x		x	x		x	x	x	x	x	x		x					x	
Flood	x	x					x	x	x	x	x		x	x	x	x	x	x	x		x	x	x		x	x	x	x	x
Hazardous Materials Release		x					x						x			x					x								
Landslides					x										x		x		x	x	x		x		x	x	x	x	x
Severe Weather or Storms	x					x		x			x				x	x	x	x			x			x					
Tsunami									x		x				x														
Wildfire	x	x	x		x	x	x	x	x	x	x		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x

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		<ul style="list-style-type: none"> Covers noise, floods, seismic and geologic hazards, fires, hazardous materials, disaster preparedness, and community health.
Fresno	2000	<ul style="list-style-type: none"> The Health and Safety Element is divided into seven sections: Emergency Management and Response; Fire Hazards; Flood Hazards; Seismic and Geological Hazards; Airport Hazards; Hazardous Materials; and Noise.
Lake	2008	<ul style="list-style-type: none"> Provides goal, policies, and implementation measures designed to protect public health, safety, and welfare of community from unreasonable risks while minimizing damage to structures, property, and infrastructure resulting from natural and man-made hazards.
Lassen	1974 (Updated 2020)	<ul style="list-style-type: none"> Incorporates the most current Hazard Mitigation Plan by reference and provides the current structure for the element. There have been no changes since the original adoption in 1974.
Los Angeles	1990	<ul style="list-style-type: none"> Identifies environmental hazards including seismic activity, geotechnical hazards, floods, and fires. Outlines regulations in place to mitigate risks and identifies agencies that provide oversight.
Madera	1995	<ul style="list-style-type: none"> Provides goals, policies, and implementation program designed to address health and safety concerns.
Mendocino	2009	<ul style="list-style-type: none"> Sets policy to minimize natural hazard risks (e.g., earthquakes, wildfire, flooding) as well as manmade hazards and nuisances (e.g., noise, poor air quality, hazardous materials).
Monterey	2010	<ul style="list-style-type: none"> Establishes policies and programs to protect the public from risks associated with seismic, geologic, flood, and wildfire hazards.
Napa	2009	<ul style="list-style-type: none"> Identifies earthquakes, fires, floods, liquefactions (when water saturated soil “liquifies” during an earthquake and structures sink into the ground), and dam inundation as potential risks to public safety. References the Napa County Operational Area Hazard Mitigation Plan (NOAHMP), adopted in 2004, as the primary resource for detailed analyses of each of the potential hazard types. Policies related to interdepartmental cooperation in hazard mitigation efforts, information dissemination, risk evaluation, and the need for individual/community disaster plans are outlined in the Safety Element.

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Nevada		<ul style="list-style-type: none"> Local hazard mitigation plan that analyzes local risk and vulnerabilities and establishes goals, objectives, and strategies.
Placer		<ul style="list-style-type: none"> Local hazard mitigation plan that analyzes local risk and vulnerabilities and establishes goals, objectives, and strategies.
Plumas		<ul style="list-style-type: none"> Local hazard mitigation plan that analyzes local risk and vulnerabilities and establishes goals, objectives, and strategies.
San Bernadino	2012	<ul style="list-style-type: none"> Establishes goals, policies, and programs to protect the community from risks associated with natural and man-made hazards such as geologic, flooding, and fire hazards.
Santa Clara	1994	<ul style="list-style-type: none"> Contributes to land use policies and standards by relating the type and intensity of land use relative to estimated level of risk, and the availability of services and facilities to ensure safety.
Santa Cruz	1994 (2021)	<ul style="list-style-type: none"> Updated policies in the GP/LCP Public Safety Element address climate change, coastal bluffs and beaches, erosion control, flood hazards, fire hazards, and environmental justice. Updated air quality policies and relocation of the policies from the Conservation and Open Space Element to the Safety Element.
San Diego	2011 (2021)	<ul style="list-style-type: none"> Safety considerations in the planning and decision-making process by establishing policies related to future development that will minimize risk of personal injury, loss of life, property damage, and environmental damage associated with natural and human-cause hazards.
San Mateo	2003 (2012)	<ul style="list-style-type: none"> Designate land uses in order to minimize the danger of natural and man-made hazards to life and property.
Shasta	2004	<ul style="list-style-type: none"> Encompasses General Plan elements concerned with aspects of Shasta County's natural and man-made environment which pose potential threats to human life or property, including seismic and geologic hazards, flood protection, dam inundation, fire safety and sheriff protection, noise, and hazardous materials.
Siskiyou	1974	<ul style="list-style-type: none"> Examines the particular, physical needs of a county in relation to safety and seismic-safety, and to establish procedures for the orderly development of the county relative to physical problems.
Solano	2008 (2015)	<ul style="list-style-type: none"> Presents the county's vision to protect people and property from natural and human-made hazards, promote public health, preserve air and water

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		quality, and guide development in a sustainable manner that respects the needs of both people and the environment.
Sonoma	2014	<ul style="list-style-type: none"> • Intended to protect the community from unreasonable risks from seismically induced surface rupture, ground shaking, ground failure, tsunami, dam failure, slope instability leading to mudslides, landslides, subsidence and other known geologic hazards, flooding, and fire. • Includes maps of known hazards, and assesses evacuation routes, water supply needs, road widths, clearances around structures, and items related to potential catastrophic events.
Stanislaus	1994 - 2016 (2017)	<ul style="list-style-type: none"> • Information on the various types of safety hazards is summarized within the Safety Element.
Tehama	2018	<ul style="list-style-type: none"> • Multi-jurisdiction local hazard mitigation plan that analyzes local risk and vulnerabilities and establishes goals, objectives, and strategies.
Trinity	2014	<ul style="list-style-type: none"> • Sets forth goals, objectives, and policies for airport safety, flood risks or dam failures, hazardous materials, seismic or geological hazards, wildfires and structures, air quality, climate change, and military operation area.
Tulare	2012	<ul style="list-style-type: none"> • Establishes policies to protect the public from risks associated with natural and human-made hazards such as seismic hazards, geologic hazards, flooding, wildfire hazards, and air pollution.
Yolo	2008	<ul style="list-style-type: none"> • This element ensures that appropriate consideration of both natural and human-made hazards and risks are factored into land use decision-making.

Threat to Community Lifelines

The following section identifies risks to indispensable services and community lifelines for the State of California. In February 2019, FEMA released the Community Lifelines Implementation Toolkit which focuses on seven categories of Community Lifelines.³⁸ FEMA defines these lifelines as critical business, government and essential services that provide health, safety, and economic security within a community. Community lifelines in preparedness planning and recovery provide details on the critical functions and stakeholders that facilitate the most effective response and get services and infrastructure back online after a disaster. To examine how risks and hazards affect human health, safety, and economic security, the state has completed a quantitative analysis of the significant potential impacts and risks of these critical service areas:

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- **Safety and Security** - Wildfires and flood hazards create significant immediate threats to life and property in impacted communities. Emergency responders, police officers, and government officials must be able to meet critical needs to ensure the public's safety at the time of the threat and address situations until they are able to return to normal. First responders and personnel are responsible for ensuring plans, systems, and communications are in place to meet the need of the situation, secure any threats to life, and mitigate citizen needs for recovery.
- **Communication** – The destruction of communications infrastructure by fire severely impacts first responder communications and emergency notification capabilities. Cellular communications, broadband, radio, and television infrastructure are susceptible to damage by active fires and can leave responders unable to coordinate and residents unable to receive critical evacuation or shelter orders.
- **Food, Water, Sheltering** - Water storage facilities and delivery systems are at serious risk of wildfire damage. For example, increased sediment loading due to soil erosion resulting from fires can decrease water storage capacity in dams and reservoirs. Watersheds are identified as essential pieces of California's water system. Measures to maintain and restore forested watersheds can reduce the risk of damaging fires that can cut water supplies.⁴⁰
- **Flood Risk** - The SHMP calculates that one in every five California residents live in a floodplain (500-year flood zone) and all counties in California have populations that have some exposure to flood risks. The SHMP reports that the statewide value of structures and contents at risk from a 500-year flood event is more than \$575 billion, distributed over all 10 Hydrologic Regions. Specifically, Los Angeles, Orange, and Santa Clara Counties are most in jeopardy with more than 500,000 people, structures, and contents worth more than \$70 billion, at risk of flooding. Flooding disproportionately affects urban areas, along with the high concentrations of socially vulnerable populations in California's most heavily populated counties of Southern California, Monterey Bay, and San Francisco Bay Areas. There are over 20,000 state-owned structures at risk of flooding (in 100 and 500-year flood plains) totaling \$14.22 billion at risk. In the 100-year flood zone there are \$11.62 billion at risk.
- **Transportation** - Transportation infrastructure (i.e., highways, bridges, railways) are susceptible to wildfire disruption which can severely impact emergency response and emergency evacuations of residents. The SHMP identifies the closure of U.S. Highway 101 during the 2017 Thomas fire, which impacted movement of residents and emergency response capabilities.⁴¹
- **Health and Medical** - Wildfire and flood disasters create medical and public health hazards. Survivors must be triaged, immediate medical needs assessed, and long-term medical care that may have been disrupted, such as prescriptions or regular treatments, must be addressed. Field facilities providing medical treatment need supplies and medicine, which may need to be coordinated with first responders and government officials. Animals are often a concern as well. Often veterinary care and safe housing for pets and service animals is required, in addition to addressing citizen needs. Furthermore, wildfires create hazardous air quality conditions that reach far beyond the boundaries of the impacted area. California has air quality districts responsible for monitoring the safety of the air using the Air Quality Index⁴² and releasing warnings to

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the public if it is unsafe to be outside. However, these air quality ratings do not always come with clear guidance for schools and other institutions for when or if closures may be warranted or other measures may be necessary.

- **Hazardous Material (Management)** – Management of hazardous materials and containment of those materials during a disaster event are critical to public safety. Uncontained hazardous materials during a disaster can affect the ability of first responders to provide search and rescue. Such materials may also exacerbate additional hazards in a disaster situation. Community leaders and service providers must coordinate with facilities to identify existing security gaps.
- **Energy (Power and Fuel)** - Energy delivery systems (electricity, natural gas, oil) impact the ability of residents and first responders to access internet, phone, radio, and television. Disruption to energy delivery systems can adversely affect critical medial services and water infrastructure (i.e., water pumps) if redundant systems are not operationalized (i.e., emergency generators). Issues with downed powerlines can block roadways, stopping egress and ingress of residents and first responders. ⁴³

The focus of the Implementation Toolkit is organizing resources and activating lifelines for support during incident response. By identifying the most heavily impacted Community Lifelines, HCD will be able to focus CDBG-DR funds in those areas and provide long-lasting or permanent interventions, breaking the cycle of repeated federal, state, and local investment in the same vulnerable lifelines.

Examples include efforts to improve emergency communication protocols between agencies for faster response times or improving shelter networks to provide resources to those recovering from a disaster more efficiently.

The components of the Community Lifelines are indicated below:

FIGURE 139: FEMA COMMUNITY LIFELINES COMPONENTS

Community Lifelines	Component	Community Lifelines	Component	
Safety and Security	Law Enforcement/Security	Energy	Power (Grid)	
	Search and Rescue		Temporary Power	
	Fire Services		Fuel	
	Responder Safety	Government Service	Communications	Infrastructure
		Imminent Hazard Mitigation		Alerts, Warnings, Messages
		Evacuations		911 and Dispatch
Food, Water, Sheltering	Food/Potable Water	Transportation	Responder Communications	
	Shelter		Financial Services	
	Durable Goods	Highway/Roadway	Mass Transit	
	Water Infrastructure		Railway	

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	Agriculture		Aviation
Health and Medical	Medical Care		Maritime
	Patient Movement		Pipeline
	Public Health	Hazardous Material	Facilities
	Fatality Management		Hazardous Debris, Pollutants, Contaminants

2.4.6 Risk Assessment

The risk assessment figure below summarizes the threat categories identified in the impacted areas for each of the FEMA Community Lifelines. The risk assessment highlights the threats by hazard for each of the seven FEMA Community Lifelines. The combined threat column summarizes the average threat posed by each hazard and communicates the impact of each hazard.

The three top hazards, wildfires, flooding, and earthquakes, pose the most extreme threats to the Community Lifelines due to their history of impact across the state. Additionally, dam failure and tsunami are categorized as extreme threats due to the projected destructive impact across the Community Lifelines. Climate change, hazardous material release, and landslides/other earth movements are categorized as high threats due to their unpredictable nature and acute impacts to the Community Lifelines.

FIGURE 140: STATEWIDE HAZARDS BY COMMUNITY LIFELINE (1 OF 2)

Hazard	Safety and Security	Food, Water, Sheltering	Health and Medical	Energy
Agricultural Pest/Invasive species	Very Low Threat	High Threat	Moderate Threat	Very Low Threat
Dam Failure	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Climate Change	High Threat	High Threat	High Threat	High Threat
Earthquake	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Flood	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Hazardous Material Release	High Threat	High Threat	High Threat	Moderate Threat
Landslide and Other Earth Movements	Extreme Threat	Extreme Threat	Moderate Threat	High Threat
Severe Weather/Storms	Moderate Threat	Moderate Threat	Moderate Threat	High Threat
Tsunami	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Wildfire	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Other Human-Caused Hazards	Moderate Threat	Moderate Threat	Moderate Threat	Moderate Threat

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FIGURE 141: STATEWIDE HAZARDS BY COMMUNITY LIFELINE (2 OF 2)

Hazard	Safety and Security	Food, Water, Sheltering	Health and Medical	Energy
Agricultural Pest/Invasive species	Very Low Threat	Very Low Threat	Very Low Threat	Low Threat
Dam Failure	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Climate Change	High Threat	High Threat	High Threat	High Threat
Earthquake	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Flood	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Hazardous Material Release	Moderate Threat	Moderate Threat	High Threat	High Threat
Landslide and Other Earth Movements	High Threat	Extreme Threat	High Threat	High Threat
Severe Weather/Storms	High Threat	Moderate Threat	Low Threat	Moderate Threat
Tsunami	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Wildfire	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Other Human-Caused Hazards	Moderate Threat	Moderate Threat	Moderate Threat	Moderate Threat

Community Wildfire Protection Plans

Community Wildfire Protection Plans are community-based planning documents that identify and address local hazards and risks from wildfire and provide a roadmap of actions for a community to address wildfire threats. Community Wildfire Protection Plans (CWPP) also create the opening for government entities to be eligible for federal funding opportunities for plan implementation. The CWPP's are authorized and defined by Title I of the Healthy Forests and Restoration Act (HFRA), passed in Congress in 2003.

CWPPs can vary in scope, scale, and detail but must meet three minimum requirements to be adopted per the HFRA and the State of California. The requirements include:

- Collaboration – CWPPs must be collaboratively developed. Local and state officials must meaningfully involve nongovernmental stakeholders and federal agencies that manage land in the vicinity of the community.
- Prioritized Fuel Reduction – CWPPs must identify and prioritize areas for hazardous fuel-reduction treatments on both federal and non-federal land.
- Treatment of Structural Ignitability – CWPPs must recommend measures that homeowners and communities can take to reduce the ignitability of structures throughout the plan area

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FIGURE 142: 2020 AND 2021 DISASTER IMPACTED COUNTIES WITH COMMUNITY WILDFIRE PROTECTION PLANS

DR-4558	Year Adopted or Last Updated	DR-4569	Year Adopted or Last Updated	DR-4610	Year Adopted or Last Updated
Butte County	2008	Fresno County	N/A	Plumas County	2019
Lake County	2009	Los Angeles County	2012	Nevada County	2016
Lassen County	2009	Madera County	N/A	Placer County	2021
Mendocino County	2005	Mendocino County	2005	Tehama County Resource Conservation District	2020
Monterey County	2011	Napa County	2009		
Napa County	2009	San Bernadino County	2011		
San Mateo County	2018	San Diego County	2006		
Santa Clara County	2009	Shasta County	2016		
Santa Cruz County	2010	Siskiyou County	2009		
Solano County	In development	Sonoma County	2010		
Sonoma County	2010				
Stanislaus County	N/A				
Trinity County	2011				
Tulare County	2010				
Yolo County	In development				

2.4.7 Relevant State Laws and Programs

California State Laws

AB 2140, Hancock. General plans: Safety Element

AB 2140 authorizes a city, county, or a city and county to adopt, with its Safety Element, a federally specified LHMP that includes specified elements and require Cal OES to give preference to local jurisdictions that have not adopted a LHMP with respect to specified federal programs for assistance in developing and adopting a plan.

AB 642 1035 (2021), Friedman. Wildfires.

This legislation directs HCD, CAL FIRE and the Department of Insurance to make recommendations on how to understand and model wildfire risk for a community and specific parcels through the input of mitigating factors. This legislation also direct CAL FIRE to update and revise Fire Severity maps. The results include recommendations for cost-effective ways to gather data on mitigation factors, an evaluation of the effectiveness of using natural infrastructure as a community buffer as well as identification of barriers to determining the wildfire risk of a community and specific parcels.

AB 1945 1035 (2021), Aguiar-Curry. Wildfires.

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This bill establishes a new state funded program for predevelopment through reconstruction, of multifamily affordable housing in the state's declared disaster areas that have experienced damage and loss of homes occupied by or affecting lower income households. This bill would require HCD to establish an application process for CDFIs to apply for emergency short-term or temporary loans under the program. CDFIs would then issue short-term loans to nonprofits, local or tribal governments for not only construction/development purposes, but also for childcare and social services linked to a project.

SB 1035, Jackson. General plans

The Planning and Zoning Law requires cities and counties to adopt a comprehensive, long-term general plan that includes, among others, a housing element and a safety element for the protection of the community from unreasonable risks associated with the effects of various hazards, such as seismic, flooding, and wildland and urban fires. Existing law requires the housing element to be revised at least once every eight years. However, the housing element is also reviewed and updated according to revisions of the safety element. This helps jurisdictions to identify new information related to flood and fire hazards that was not previously available and be able to address risk in both elements of the general plan. Existing law also requires the safety element to be reviewed and updated as necessary to address climate adaptation and resiliency strategies applicable to the city or county.

SB 901, Dodd. Wildfires

SB 901 was signed into law to help mitigate wildfire risk and expand and speed up recovery efforts. In addition, it established the Commission on Catastrophic Wildfire Cost and Recovery within the Office of Planning and Research. The Commission consists of five appointed members with specified expertise and is required to hold at least four public meetings throughout the state relating to the costs of damage associated with catastrophic wildfires. In 2019 the Commission, in consultation with the Public Utilities Commission (PUC) and the Insurance Commissioner, prepared a report containing its assessment of the issues surrounding catastrophic wildfire costs and the reduction of damage, and making recommendations for changes to law that would ensure equitable distribution of costs among affected parties.

AB 430, Gallagher Housing Development: Camp Fire Housing Assistance

The Camp Fire Housing Assistance Act establishes a ministerial approval process for housing development in the cities of Biggs, Corning, Gridley, Live Oak, Orland, Willows, Yuba City, and Oroville that meet specified objective planning standards. Development proponents are required to hold at least one public meeting on the project before applying. Project approvals that expire after three years may receive a one-time, one-year extension if the developer demonstrates significant progress. Project approvals do not expire if the project includes investments in affordable housing, and approvals for all projects remain valid once vertical construction has been initiated. These provisions expire on January 1, 2026.

AB 782, Berman California Environmental Quality Act: Exemption: Public Agencies

The California Environmental Quality Act exemption creates a CEQA exemption for the acquisition, sale, or other transfer of interest in land, as well as the granting or acceptance of funds, by a public agency for conservation purposes.

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California FAIR Plan

The FAIR Plan is an association of all insurers authorized to provide basic property insurance in California and provides insurance of last resort. The FAIR Plan is intended to provide basic property insurance to those who cannot obtain insurance in the voluntary market due to circumstances outside of their control. No public funding is used in the FAIR Plan and it is not administered by a state agency.

In November 2019, the state ordered the FAIR Plan to offer more comprehensive policies and increase the amount of coverage to \$3 million, in comparison to the current basic policies that require additional coverage to meet the needs of property owners. State insurance regulators have placed a one-year moratorium banning insurers from dropping policies of homeowners in and around areas hardest hit by recent fires. This is a response to the complaints of homeowners that they cannot find affordable insurance, or insurance at all. The moratorium includes more than 800,000 homeowners in zip codes next to 16 recently declared wildfire disasters in Northern and Southern California.

California State Programs

California Department of Forestry and Fire Protection (CAL FIRE): CAL FIRE is a California state department dedicated to the fire protection and stewardship of over 31 million acres of California's privately-owned wildlands. In addition, the department provides varied emergency services in 36 of the state's 58 counties via contracts with local governments. CAL FIRE is responsible for fire prevention in the State Responsibility Area (SRA) and has expanded its efforts significantly to meet evolving wildfire threat. In addition to its wildland firefighting role, CAL FIRE serves as an "all-risk" department, meaning that CAL FIRE crews and equipment are also dispatched to non-wildfire emergency scenarios, including auto accidents, hazardous material spills, search and rescue missions, civil disturbances, earthquakes, and more.

Fire Prevention Program (FPP): The Fire Prevention Program consists of multiple activities including wildland pre-fire engineering, vegetation management, fire planning, education and law enforcement. Typical fire prevention projects include brush clearance, prescribed fire, defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, and fire-related law enforcement activities.

Office of the State Fire Marshal (OSFM): The OSFM has operated as part of CAL FIRE since 1995 and supports the department's mission to protect life and property through fire prevention engineering programs, law and code enforcement and education. The OSFM also collects, analyzes, and reports on critical incident statistics for local and state government emergency response agencies, which support the building of action plans and other long-term recovery documents.

Urban & Community Forestry Grant Program (UCF): The UCF works to expand and improve the management of trees and related vegetation in communities throughout California, and to lead the effort to advance the development of sustainable urban and community forests in California. To meet that goal, the UCF administers state and federal grants throughout California communities to advance urban forestry efforts.

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California Forest Improvement Program (CFIP): The purpose of the CFIP is to encourage private and public investment in, and improved management of, California forest lands and resources. The CFIP is dedicated to ensuring the availability of adequate high quality timber supplies, supporting timber-industry employment and related economic benefits, and to protecting, maintaining, and enhancing a productive and stable forest resource system for the benefit of present and future generations. The CFIP provides cost-share assistance to private and public land ownerships containing 20 to 5,000 acres of forest land for activities including preparation of forest management plans, supervision by a Registered Professional Forester for reforestation, stand improvements, and forestland/fish and wildlife habitat improvements.

Wildfire Prevention Grant Program (WPGP): CAL FIRE's WPGP provides funding for fire prevention projects and activities in and near fire threatened communities and focuses on activities that increase the protection of people, structures, and communities. Through the grant program, CAL FIRE provides assistance to qualifying projects and activities, including hazardous fuels reduction, wildfire prevention planning, and wildfire prevention education with an emphasis on improving public health and safety while reducing greenhouse gas emissions.

California Governor's Office of Emergency Services (CalOES): Cal OES is a California state cabinet-level office responsible for overseeing and coordinating emergency preparedness, response, recovery and homeland security activities within the state. Cal OES was created by AB 38 (2008), superseding both the Office of Emergency Services (OES) and Office of Homeland Security (OHS). Cal OES manages hazard mitigation activities and projects through the 404 Hazard Mitigation Grant Program, Building Resilient Infrastructure and Communities Program, and the Flood Mitigation Assistance Program.

Hazard Mitigation Grant Program (HMGP): After a Presidential Disaster Declaration in the state of California, CalOES activates FEMA's Hazard Mitigation Grant Program (HMGP) to fund plans and projects that reduce the effects of future natural disasters. Funds are administered by the Cal OES HMGP Unit. Eligible sub-applicants include state agencies, local governments, special districts, and some private non-profits.

Building Resilient Infrastructure Communities (BRIC): Authorized by Section 203 of the Stafford Act, BRIC will support states, local communities, tribes and territories as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards. BRIC-supported projects may include natural hazard risk reductions on a neighborhood scale, interventions that mitigate risk to critical infrastructure or achieve community-level risk reduction, activities that provide protection and benefits for disadvantaged communities, or projects that address climate impacts and advance climate adaptation.

Flood Mitigation Assistance Grant Program (FMA): The FMA is a competitive grant program that provides funding to states, local communities, and federally recognized tribes and territories. Funds can be used for projects that reduce or eliminate the risk of repetitive flood damage to buildings insured by the National Flood Insurance Program.

California Office of Planning and Research (OPR): OPR studies future research and planning needs, fosters goal-driven collaboration, and delivers guidance to state partners and local communities, with a focus on land use and community development, climate risk and resilience, and high road economic development.

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Integrated Climate Adaptation and Resiliency Program (ICARP): Former Governor Brown signed Senate Bill 246 in 2015, which directed OPR to form the Integrated Climate Adaptation and Resilience Program (ICARP). ICARP is designed to develop a cohesive and coordinated response to the impacts of climate change across the state, and to develop holistic strategies to coordinate climate activities at the state, regional and local levels, while advancing social equity. ICARP administers grant programs to local jurisdictions through the Adaptation Planning Grant Program, Regional Resilience Planning and Implementation Grant Program, and Community Resilience and Heat Grant Program.

Adaptation Planning Grant Program (APG): The APG Program provides funding to local, regional, and tribal jurisdictions to support planning needs, provides communities the resources to identify climate resilience priorities, and supports the development of a pipeline of climate resilient infrastructure projects across the state.

Regional Resilience Planning and Implementation Grant Program: This program will support regions in advancing resilience through capacity-building, planning, and project implementation.

Community Resilience and Heat Grant Program: This program will help communities prepare for the impacts of extreme heat.

California Department of Housing and Community Development

Regional Early Action Planning Grants Program (REAP 2.0): Administered by the California Department of Housing and Community Development (HCD), in collaboration with OPR, the Strategic Growth Council, and the California Air Resources Board, REAP 2.0 is a flexible program that seeks to accelerate progress towards California state housing goals and climate commitments through a strengthened partnership between the state, its regions, and local entities. The program seeks to support infill housing development, reduce miles traveled by commuters, increase housing supply at all affordability levels, affirmatively further fair housing, and facilitate the implementation of adopted regional and local plans to achieve these goals. REAP 2.0 provides a \$600 million state and federal investment to advance implementation of adopted regional plans by funding planning and implementation activities that accelerate infill housing and reductions in per capita Vehicle Miles Traveled (VMT). The program is funded through \$500 million from the Coronavirus Fiscal Recovery Fund of 2021 and \$100 million from the State General Fund. REAP 2.0 was established as part of the 2021 California Comeback Plan under [AB 140](#).

CalHome and CalHome Disaster Programs: The CalHome program is designed to assist low- and very low-income households to become or remain homeowners by making grants to local public agencies and nonprofit developers for the following activities:

- Assisting individual first-time homebuyers through deferred-payment loans for down payment assistance
- Home rehabilitation, including for manufactured homes not on permanent foundations
- Acquisition and rehabilitation
- Homebuyer counseling
- Self-help mortgage assistance

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- Technical assistance for self-help homeownership.

In its 2021 CalHome NOFA, HCD announced the availability of \$57 million of state funds, with \$20 million reserved for mobile homes. In November 2021, HCD made \$23 million available for counties impacted by the 2020 disasters. As of the publication of this Action Plan, HCD is still evaluating program applications for this round of funding. However, with any funding awarded within the 2020 MID area, HCD will ensure that CalHome or CalHome Disaster is considered within the total cost to rebuild, as layering funding is critical for reconstruction in the 2020 impacted areas. While CalHome is not considered a duplication of benefit, the OOR program will evaluate all applicants and available funding sources.

2.4.8 Governor's 2021-2022 Budget⁷²

Governor Newsom submitted his 2020-2021 budget request in January 2021 that includes funding to address the threat of catastrophic wildfires, climate change, and forest resilience.

- Climate Catalyst Fund, \$47 million in loans for climate related projects including wildfire and forest resilience.
- Cal OES expansion of a disaster recovery outreach campaign and:
 - \$256 million to reimburse local governments for emergency activities.
 - \$17.3 million for the California Earthquake Authority to update its Early Warning System.
 - \$25 million for Cal OES and CAL FIRE to implement a home hardening pilot grant program.
- \$500 million for a third round of Low-Income Housing Tax Credits (LIHTC)
- Wildfire and Forest Resilience:
 - \$512 million for Resilient Forest and Landscapes – Forest thinning, tree planting, prescribed fires; forest health and watershed recovery grants; investment in Tribal communities; support for small landowners to manage forest lands; targeted investment for state landholdings.
 - \$335 for Wildfire Fuel Breaks – Partnership between CAL FIRE and the California Conservation Corps to complete 45-60 fuel breaks; provide technical assistance to local communities to develop fire safety projects, cross-jurisdictional plans, and fund project implementation.
 - \$38 million for Community Hardening – Educational programs, defensible space outreach, and basic home retrofits.
 - \$39 million for Science-Based Management – Research on long-term forest health.
 - \$76 million for Forest Sector Economic Stimulus – Expand wood product market to use thinned materials; low interest loans through the Climate Catalyst Fund.
- Statutory changes to allow Cap and Trade funding for CAL FIRE's forest health and fire prevention programs.

⁷² "The 2020-21 Budget: Overview of the California Spending Plan," LAO Report (Legislative Analyst's Office, October 5, 2020), <https://lao.ca.gov/Publications/Report/4263>.

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2.4.9 Statewide Plan Alignment for Equitable Recovery from Disasters

The Governor's Office of Planning and Research (OPR) leads long range planning and recovery project implementation for climate resilience and sets equitable recovery goals for state agencies. HCD's proposed 2020 Action Plan and proposed programs align with these goals outlined by OPR and presents programs that allow disaster impacted communities with different capacity levels to have access to disaster recovery and mitigation programs.

OPR prioritizes creating an equitable recovery, disaster resilience, and climate change mitigation. HCD's proposed programs will integrate these principles as disasters, disaster recovery, and mitigation from natural hazards continue to impact the State of California and its residents. HUD requires CDBG-DR grantees to focus on vulnerable populations in its recovery and mitigation activities, and HCD and its state partners further that commitment by defining, identifying, and prioritizing vulnerable populations in its recovery and mitigation programs. In the context of climate adaptation, OPR and the Integrated Climate Adaptation and Resiliency Program (ICARP) define climate vulnerability as:

"Climate vulnerability describes the degree to which natural, built, and human systems are at risk of exposure to climate change impacts. Vulnerable communities experience heightened risk and increased sensitivity to climate change and have less capacity⁴ and fewer resources to cope with, adapt to, or recover from climate impacts. These disproportionate effects are caused by physical (built and environmental), social, political, and/ or economic factor(s), which are exacerbated by climate impacts. These factors⁵ include, but are not limited to, race, class, sexual orientation and identification, national origin, and income inequality."⁷³

To further state identified goals and address climate vulnerability, HCD's proposed 2020 CDBG-DR and Mitigation programs endeavor to align planning efforts at the state and local level, promote housing and infrastructure to reduce climate risk and reduce climate risk, and develop planning documents that are used throughout government decision-making processes. For the proposed disaster recovery and mitigation programs, HCD will work to align program design to fit the following activities:

- Plan Alignment ⁷⁴– align recovery and mitigation activities with existing state and local planning documents including:
 - General Plans (Housing and Safety Element), Local Hazard Mitigation Plan, Regional Transportation Plan, Community Wildfire Protection Plan, Local Coastal Programs
- Encourage planning efforts beyond jurisdictional boundaries.
- Ensure infrastructure projects account for the useful life of critical infrastructure, not just the design life.

⁷³ Defining Vulnerable Communities in the Context of Climate Adaptation" (Governor's Office of Planning and Research, July 2018), https://opr.ca.gov/docs/20180723-Vulnerable_Communities.pdf.

⁷⁴ For more on plan alignment, visit OPR's [Plan Alignment Clearinghouse](#).

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- Examples of implementation activities that advance the State’s climate resilience/mitigation and equitable recovery goals include:
 - Adopting zoning ordinances that facilitate infill, risk reduction, and sustainable land use and that are consistent across relevant planning documents.
 - Rebuilding transportation infrastructure that improves accessibility for non-vehicular transport modes and evacuation routes.
 - Building new housing units that are within existing development footprints and walkable to job centers, schools, and public services.
 - Using nature-based solutions to reduce community climate risk, protect watershed health and reduce infrastructure costs.
 - Hardening structures to reduce climate hazard risk to homes and businesses.
 - Coordinating incentives for strategic land assemblage to conserve natural/working lands, restore natural landscape functions, and/or transfer redevelopment to lower-risk locations.
 - Supporting workforce development programs in industries critical to forest resource management (e.g., prescribed burning, advanced wood products) and renewable energy.

3. General Requirements

3.1 Citizen Participation

In the development of this disaster recovery action plan, HCD consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive. Grantees should list key state, tribes, local governments, federal partners, nongovernmental organizations, the private sector that were involved in the citizen participation process.

HCD recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through a proactive outreach and engagement strategy that involved local governments, tribes, community organizations, and social service providers for vulnerable populations.

3.2 Outreach and Engagement

The Action Plan presents an opportunity to define housing problems, educate, and create solutions for post disaster housing recovery needs. The inclusion of vulnerable population and community stakeholders in the Action Plan public participation process helps ensure the needs of these stakeholders is identified and addressed. HCD recognizes the outreach challenges and encourages participation of citizens in all aspects of the state's CDBG DR program and implementation process by going above and beyond the disaster recovery requirements. HCD is doing additional outreach events to reach a broader audience as well as reducing barriers to accessing HCD resources beyond disaster recovery. This is intended to ensure that populations such as persons with disabilities or limited English proficiency are aware of the support that may be available to them through CDBG DR, and other state assisted programs in the jurisdictions in which they reside.

In addition, disaster recovery programs and policies are aligning housing strategies with climate change objectives, housing production, infrastructure improvements, and resiliency goals to mitigate future disasters. The new FRN has combined the housing recovery and mitigation activities into one. In proposed resilience-related activity descriptions, HCD will include outreach strategies to increase awareness of the hazards in MID-area communities (including for members of protected classes, vulnerable populations, and underserved communities). The goal is to build back better, not just replace what was lost. Successful public participation is important because vulnerable populations have historically faced barriers to engage or receive assistance from disaster recovery programs.

The Outreach Plan outlines a comprehensive plan to inform stakeholders about the CDBG-DR grant and proposed programs, and to engage other federal and state resources to assist with recovery after a disaster. This plan identifies not only mandated outreach requirements, but also the broader set of stakeholders engaged with housing and community development in impacted

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areas. Finally, the outreach plan addresses actions by HCD to reduce barriers for engagement and participation in disaster recovery programs.

3.2.1 Stakeholder Consultation

Community outreach methods will seek to engage a diverse group of community members, including populations defined as protected classes by HUD, including but not limited to persons with limited English proficiency, persons with disabilities, and ensure a balance with rural community outreach. The broad set of stakeholders targeted for outreach include:

- Disaster Property Owners
- Disaster Affected Cities and Counties
- Affordable Housing Developers
- Voluntary, Charitable, Faith, and Community Based Organizations
- Tribal Government
- Long-Term Housing Recovery Groups
- Non-Profits
- Government Agencies
- Local Emergency Management Agencies
- Public Housing Authorities (PHAs)
- Private Sector
- Organizations that represent protected class members and vulnerable populations.

To facilitate outreach involvement, HCD will coordinate actions to encourage participation and allow equal access to information about the Action Plan. These methods include a variety of digital and non digital means, in multiple languages, and with varying level of detailed information. These may include, but are not limited to:

- Print media, such as the newspaper (mandated for FRN)
- HCD's and other agencies social media
- State of California Governor's Office of Emergency Services (Cal OES), State of California Office of Planning and Research (OPR), and CAL FIRE
- HCD emails and meeting announcements to Government Agencies
- HCD emails to Affordable Housing Developers in DR counties
- HCD emails and meeting announcements to Voluntary Organizations and Non-Profits
- Announcements in interagency meetings
- Notices posted to HCD's CDBG-DR website in English and Spanish
- Direct mail and email to Tribal Governments via HCD and Cal OES contact list
- Interagency consultation and coordination
- HCD's Long-term Recovery Meetings Organized by Cal OES and FEMA
- Recovery Support Function Meetings (RSF)
- Virtual targeted community meetings in disaster impacted areas
- Virtual meetings with stakeholders listed above
- Broad HCD Distribution List
 - CDBG-DR program contact list
 - Other state and federal program contact lists

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- HCD's Tribal Initiative
- HPD contact list

3.2.2 Primary Stakeholder Group

The primary stakeholders include mandated outreach per FRN as well as key partners helping communities' recovery from disasters. They include:

- Disaster Survivors
- Affected Disaster Recovery Cities and Counties (multiple meetings)
 - Housing and Community Development Staff
 - Infrastructure Public Works/Debris Removal
 - Planning and Permitting
 - Emergency Response Managers
- Tribal Government in disaster declared areas
- Government Partners (multiple meetings)
 - Cal OES
 - OPR
 - CAL FIRE
 - Department of Insurance
 - CalSTA/Caltrans
 - FEMA
- Public Housing Authorities (PHAs)
- Long-Term Housing Recovery Groups
- Disaster Case Managers
- Organizations that represent protected classes and vulnerable populations

NOTE: HUD defines vulnerable populations as a group or community whose circumstances present barriers to obtaining or understanding information or accessing resources. In the Action Plan, HCD will identify those populations (i.e., which protected class, vulnerable population, and historically underserved groups were considered) and how those groups can be expected to benefit from the activities.

3.2.3 Secondary Stakeholder Advisors

The secondary stakeholders comprises of groups that are either not directly impacted by the disaster or mandated by the FRN. These secondary groups can assist primary stakeholders in their recovery needs and or will benefit from awareness of disaster recovery efforts as the state implements various housing, transportation, or climate change policies. They include:

- Affordable Housing Developers in the disaster impacted counties
- Statewide organizations such as Housing California or California Housing Partnership Corporation
- Organizations that work primarily in rural communities, such as, Rural Community Assistance Corporation (RCAC)
- State and Local Hazard Mitigation Planners, Funders, and Implementers
- Legislative Offices and Policy Makers

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- Regional Planning Entities
- Universities and Research Groups

3.2.4 Stakeholder Meetings and Public Hearings

2020 Disasters

There will be multiple meetings for specific target groups and topics starting in March 2022 and ending with a final public comment meeting. HCD will advertise these public meetings 14 days prior in English and Spanish to all the stakeholders identified above according to HUD and HCD standards. A contact person's name will be included for reasonable accommodation, translation services, and or any other questions. Registration instructions for the meetings will be included in the announcements.

All notices of publications ran on May 6, 2022 and included an announcement of both the public comment period of 30 days (beginning May 6, 2022 and ending June 6, 2022) and the public meeting webinars held on May 18 at 6pm PST, in English, and May 19th at 6pm PST, in Spanish. The PDFs of these presentations can be found on HCD's 2020 Disaster Recovery website. <https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/cdbg-dr-2020/index.shtml> All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allowed for questions and answers in real time between public meeting participants and HCD staff (in both English and Spanish). All questions and answers received during the public comment period, either through the public meetings or through written comments to HCD staff, are addressed in writing in this Action Plan.

Stakeholder Meetings will have included the following events:

Pre-Federal Register (FRN) Notice Meetings: Prior to the release of the FRN, HCD met with stakeholders in each IA-declared county to explain the CDBG-DR processes and Action Plan requirements. Impacted counties identified the following items as recovery priorities:

Fresno: Damage to community sewer and water systems in and near burn areas; need hazardous material/debris removal; damage to primary residences and vacation homes

Napa: Support for residents using emergency rental assistance

Siskiyou: Need for direct housing assistance and utilities connection for FEMA trailers

Lake: Private wells and septic systems damaged or destroyed; cabins and vacation homes damaged or destroyed

Madera: Need for direct housing assistance

Mendocino: Residents requesting direct assistance; unknown level of housing need

San Diego: Debris removal; temporary and long-term housing

Santa Cruz: Infrastructure damage; need case management support for housing individuals and families

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FIGURE 143: COUNTY-REPORTED RECOVERY NEEDS FROM 2020 DISASTERS

County	Initial Recovery Need from 2020 Disasters
Butte	Temporary housing; reconstruction and new construction of housing
Santa Cruz	Infrastructure rebuilding
Napa	Support for residents using emergency rental assistance
Sonoma	Support for residents using emergency rental assistance; utilities assistance for LMI residents
Fresno	Damage to community sewer and water systems in and near burn areas; need hazardous material/debris removal; damage to primary residences and vacation homes
Siskiyou	Need for direct housing assistance and utilities connection for FEMA trailers
Trinity	Long-term lack of affordable housing
Tulare	Water system destroyed; significant un- and under-insured segment of homeowners
Mendocino	Residents requesting direct assistance; unknown level of housing need
Lake	Private wells and septic systems damaged or destroyed; cabins and vacation homes damaged or destroyed
Yolo	Small number of damaged homes
Madera	Need for direct housing assistance
Santa Cruz	Infrastructure damage; need case management support for housing individuals and families
San Diego	Debris removal; temporary and long-term housing

Pre-Public Comment Action Plan Meetings: HCD meets with state agency partners and local governments on an ongoing basis about specific 2020 CDBG-DR allocation requirements, processes, and updated timelines. Meetings focus on the development of the Action Plan document and preparation for public release before the start of the public comment period.

Local Government Kick Off Meeting (4/20/22) – 42 attendees from local governments impacted by the 2020 disasters participated in a briefing and discussion on CDBG-DR funding. The following provides a summary of the feedback provided by local government stakeholders:

Trinity County – Noted that the elderly and retired population are struggling to recover; a lot of vegetation from Bureau of Land Management, U.S. Forest Service, and private land that needs to be cleared.

Butte County

- Population with access and functional needs are struggling to recover from the 2020 disaster and other overlapping disasters.

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- Renters and precariously housed population have few options due to limited availability of housing overall.
- Rural homeowners are having a tough time rebuilding due to significant uninsured and under insured population from the 2020 disaster as well as previous disasters.
- The community is experiencing funding and planning fatigue due to overlapping disasters, and while there are damages from the 2020 disasters, these are overshadowed by previous disasters.
- Low- and moderate-income renters continue to struggle with recovery, highest needs but limited to no immediate support available.
- Rebuilding/replacing septic systems remains one of the biggest barriers to recovery.
- There is a high need to develop and maintain defensible space to protect communities, but fuel management is also needed.

Shasta and Lake County - Need to retain workforce and bring back businesses in impacted areas; identified the need for workforce housing to ensure that middle income workers can assist with recovery efforts.

Santa Cruz County - Forest fuel load reduction is critical for its recovery and mitigation against future fires.

Long-Term Recovery Group Meeting (4/27/22) – HCD conducted a meeting with long-term recovery groups in impacted areas, including the MID, to brief nonprofit service providers on CDBG-DR and mitigation requirements, proposed programs, and solicit feedback from stakeholders who work directly with residents who were directly impacted by the 2020 disasters. Twenty-three service providers attended the meeting.

2021 Disasters

HCD has proactively engaged in an extensive local engagement process with the DR-4610 MID Plumas County beginning in July 2022 through July 2023. This prolonged engagement and planning period enabled the county to progress on its local recovery plan before the publication of the Action Plan Amendment. This engagement has included 13 meetings with the county staff and community recovery group Dixie Fire Collaborative, organized as workshops. These workshops were designed to equip local recovery leaders with data and policy background to support local planning processes. The county also shared local disaster impact and needs data that were not captured by the federal data sources.

HCD participated in the county's local Long-term Recovery Plan working group meetings on a biweekly basis through fall 2022 and winter 2023 and made presentations to the Dixie Fire Collaborative and County Board of Supervisors in April and May of 2023, respectively. Furthermore, in order to directly hear from the most vulnerable residents, HCD administered a survey designed for low- and moderate-income households in case management who were unlikely to attend public and community meetings – and 39 households completed the survey.

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Throughout HCD's engagement with Plumas County, key disaster impacts and recovery needs were determined to be:

- According to CAL FIRE, 779 housing units and 144 commercial structures were damaged or destroyed, creating 609 newly vacant parcels.
- Plumas County lost most of its naturally-affordable rental housing stock, primarily single family and manufactured units.
- Home prices increased by about 46 percent from pre-fire to post-fire, while average fair market rents increased by over 20 percent.
- The county experienced 15,000 cubic feet in road damages from fire suppression activities and equipment and lost over 1,000 utility poles. These damages limit access and supply chains in recovering communities.
- Lack of broadband access prevents banks from providing services in the county.
- The county was in the midst of a transition from resource extraction to recreation and tourism, but the fire is limiting access to recreational amenities for several years.
- The county experienced an estimated 1,611 in net job losses and 68 net business closures.
- Together these impacts resulted in over \$500,000 in reduced county property tax revenues in FY 22-23.

Additionally, HCD awarded Plumas County with two awards with annual CDBG funds: a \$250,000 planning grant to produce a long-term recovery plan and a \$750,000 economic development grant. The long-term recovery plan will be completed during summer 2023. Plumas County received planning support from FEMA, and HCD has worked closely with FEMA to ensure that the long-term recovery plan and the CDBG-DR Action Plan are aligned.

Public Meetings

The engagement process will culminate in the public comment period and formal public meeting. A contact person's name will be included for reasonable accommodation, translation services, and or any other questions. Registration instructions for meetings were included in the announcements. All documentation of this can be found on [HCD's website](#).

The Action Plan was posted on June 30, 2023 and public comment period lasted for over 30 days until close of business on August 8, 2023. HCD advertised these webinars at least 14 days prior in English and Spanish to all the stakeholders identified above according to HUD and HCD standards. The notice of the webinar for tribes was released 30 days before the June 27 webinar, in compliance with HCD's communications policies.

- Virtual General Public Meeting, July 26, 2023 at 6pm PST (7 attendees)
- Virtual Tribal Governmetns Public Meeting, June 27, 2023 at 10am PST (6 attendees)
- Virtual Spanish Governmetns Pubilc Meeting, June 27, 2023 at 6pm PST (0 attendees)
- In-Person General Public Comment Meeting at Greenville Elementary School, August 3, 2023 at 5:30pm PST (13 attendees)

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The PDFs of these presentations are available on [HCD's Disaster Recovery web page](#). All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allow for questions and answers in real time between public meeting participants and HCD staff. All questions and answers received during the public comment period, either through the public meetings or through written comments to HCD staff, are addressed in writing in this Action Plan.

3.2.5 Public Comment Period

HUD requires CDBG-DR grantees to convene at least one public hearing on the proposed Action Plan after it has been published on its website to solicit public comment and before submittal of the Action Plan to HUD. HCD provides a period of 30 calendar days for comments on the initial Action Plan and amendments. Directions for submitting comments will be included in the public hearing notice. Comments may be submitted to the Department via mail, email, or by telephone through the contact information provided on webpages on the Department's website, or by reaching out to the contact information provided in the public notice.

HCD will ensure that there are no potential barriers that may limit or prohibit vulnerable populations or underserved communities and individuals affected by the disaster from providing public comment on the grantee's Action Plan or substantial amendment. HCD will take reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with Limited English Proficiency (LEP).

3.2.6 Tribal Partners

It is important to ensure there is tribal engagement from the public outreach to implementation of disaster recovery programs. HCD's engagement with local communities clearly identified tribal members impacted by the 2020 wildfires, primarily in Siskiyou County. In 2019, Assembly Bill 1010 (AB 1010) was signed into law which codified tribal participation in affordable housing programs by requiring HCD to open all state programs to tribes/TDHEs (tribally designated entity), changing the definition of local public entity to include tribes/TDHEs, and allowing HCD to waive or modify program requirements. AB 1010 also reinstated HCD's tribal Technical Assistance Program known as the G. David Singleton California Indian Assistance Program (CIAP).

CIAP ensures that tribes and TDHEs receive comprehensive technical assistance on HCD programs, land use planning, natural and environmental resource planning, economic resource planning, tribal housing trust funds, etc. In accordance with CIAP, Tribal Affairs engages, educates, and collaborates with tribal partners through a variety of methods to assist tribes throughout all stages of the funding process for disaster recovery programs. The stages include all aspects of the project from consultations and listening sessions to application workshops to trainings. HCD hosted an Action Plan kick off presentation with impacted Tribal Governments on April 21, 2022. Seventeen people participated in the meeting, including the Big Valley Band Rancheria (Lake County), Robinson Rancheria (Lake County), Viejas Band of Kumeyaay Indians (San Diego County), and Karuk Tribe (Siskiyou County). This presentation included

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information about CDBG-DR, as well as other housing, infrastructure and planning funding sources to help tribal communities holistically recover from the 2020 wildfires. HCD's disaster recovery team will continue to work with CIAP to help tribal communities implement CDBG-DR programs. HCD held a subsequent meeting for impacted Tribal Governments on 6/2/22. Appendix F provides further detail on consultations with Tribal Governments and organizations that serve Tribal Governments.

3.2.7 Limited English Proficiency

To reduce barriers for non-English speakers or those with accessibility challenges, HCD will make every effort to accommodate the needs of residents at all public hearings. HCD will solicit information about the need for translators for public hearings in the notification of the hearing. Translation services may be arranged via mail, email, or by telephone through the contact information provided on the federal program webpages on the Department's website, or by reaching out to the contact information provided in the public notice. HCD maintains a list of staff that can provide translating services in American Sign Language.

3.2.8 Publications and Posting

In addition to the activities above, HCD has published this Action Plan on HCD's Disaster Recovery web page, <https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notices-frns> for a 30-day public comment period. In 2020, citizens were notified through three statewide publications, the papers of record that align with the California Department of Housing and Community Development's Citizen Participation Plan, published in both English and Spanish in the following publications: The Sacramento Daily Recorder, SF Daily Journal, and LA Daily Journal. In 2021, citizens were notified through the [Plumas News](#), the online edition for Plumas County news publications.

For 2020 funds, notices of publications ran on May 6, 2022, and included an announcement of both the public comment period of 30 days (beginning May 6, 2022 and ending June 6, 2022) and the public meeting webinars held on May 18 at 6pm PST in English and May 19 at 6pm PST in Spanish.

For 2021 funds, notices of the Action Plan Amendment publication ran on July 5, 2023 and included an announcement of the public comment period of 30 days (running from July 8, 2023 to August 8, 2023) with public meeting webinars held on July 26, 2023 at 6pm and July 27 2023 at 6pm.

The PDFs of these presentations can be found on HCD's Disaster Recovery website: <https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notices-frns>. The 2020 Action Plan was made available on the California Department of Housing and Community Development's website on May 6, 2022 for public comment in both English and Spanish, and both versions uploaded to the website were remediated for 508 compliance. The 2021 Action Plan Amendment was made available on the HCD Disaster Recovery web page on July 8, 2023 for the 30-day public comment period and was remediated for 508 compliance.

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HCD will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP).

A summary of citizen comments on this Action Plan, along with HCD's responses, is in Appendix C of this document. For more information, citizens can refer to HCD's citizen participation plan that can be found at: https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/docs/CDBG-DR-HCD-CPP_16Nov20.pdf

3.3 Public Hearings

2020 Disasters

There will be multiple meetings for specific target groups and topics starting in March of 2022 and ending with a final public comment meeting. HCD will advertise these public meetings 14 days prior in English and Spanish to all the stakeholders identified above according to HUD and HCD standards. A contact person's name will be included for reasonable accommodation, translation services, and or any other questions. Registration instructions for the meetings will be included in the announcements.

All notices of publications ran on May 6, 2022 and included an announcement of both the public comment period of 30 days (beginning May 6, 2022 and ending June 6, 2022) and the public meeting webinars held on May 18 at 6pm PST in English and May 19 at 6pm PST in Spanish. The PDFs of these presentations can be found on HCD's 2020 Disaster Recovery website. <https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/cdbg-dr-2020/index.shtml> All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allowed for questions and answers in real time between public meeting participants and HCD staff (in both English and Spanish). All questions and answers received during the public comment period, either through the public meetings or through written comments to HCD staff, are addressed in writing in this Action Plan.

Meeting Schedule – HCD conducted the following consultations during the 2020 Action Plan public comment period. HCD will conducted outreach for the meetings to ensure robust participation, following the Citizen Participation Plan for public meetings.

- Impacted Local Government meeting – 4/20/22, 10am, 42 attendees
- Impacted Tribal Governments - 4/21/22, 10am, 17 attendees
- Long-Term Recovery Group meeting – 4/27/22, 6pm, 23 attendees
- Affordable housing developers – 6/2/22, 10am, 44 attendees
- Impacted Tribal Governments – 6/2/22, 1pm, 10 attendees

2021 Disasters

Following months of informal pre-Action Plan engagement, HCD will facilitate two public comment meetings in July 2023, one for the general public (July 26, 2023 6pm) and one for tribes (July 27, 2023 10 am). HCD will advertise these public meetings at least 14 days prior (July 11, 2023) to all the stakeholders identified above according to HUD and HCD standards. A contact person's name will be included for reasonable accommodation, translation services, and

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or any other questions. Registration instructions for the meetings will be included in the announcements.

All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allowed for questions and answer in real time between public meeting participants and HCD staff. All questions and answers received during the public comment period, either through the public meetings or through written comments to HCD staff are addressed in writing in this Action Plan.

The Action Plan Amendment and PDFs of the public comment meeting presentation slides can be found on HCD's Disaster Recovery web page, under 2020 Disasters:

<https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notice-frns>.

Meeting Schedule – HCD will conduct the following consultations during the 2020 Action Plan public comment period. HCD will conduct outreach for the meetings to ensure robust participation, following the Citizen Participation Plan for public meetings.

- Virtual General Public Meeting, July 26, 2023 at 6pm PST (7 attendees)
- Virtual Tribal Governmetns Public Meeting, June 27, 2023 at 10am PST (6 attendees)
- Virtual Spanish Governmets Pubilc Meeting, June 27, 2023 at 6pm PST (0 attendees)
- In-Person General Public Comment Meeting at Greenville Elementary School, August 3, 2023 at 5:30pm PST (13 attendees)

3.4 Complaints

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). HCD will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on [Community Development Block Grant Program \(CDBG\) - Disaster Recovery \(DR\) \(ca.gov\)](#) to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse. The Fraud, Waste, and Abuse Policies and Procedures are included in HCD's Grant Administration Manual.

3.5 Public Website

HCD will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, Action Plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

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These items are made available through the HCD 2020 Disaster Recovery website, <https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notices-frns>. Specifically, *HCD* will make the following items available: the Action Plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, *HCD* will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

The website will be updated in a timely manner to reflect the most up-to date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

3.6 Amendments

Over time, recovery needs will change. Thus, HCD will amend the disaster recovery Action Plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop overtime an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

3.6.1 Substantial Amendment

A change to this Action Plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity,
- A proposed reduction in the overall benefit requirement, or
- The allocation or reallocation of \$10,000,000

When California pursues the substantial amendment process, the amendment will be posted here at <https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notices-frns> for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. California will review and respond to all public comments received and submit to HUD for approval.

There are additional circumstances for which HCD is required by the Consolidated Notice, 87 FR 6364, to submit a substantial amendment.

A substantial amendment is needed if the method of distribution for a program is not known at the time HCD submits the Action Plan to HUD. Method of distribution descriptions must include:

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- Eligibility criteria for assistance. This includes a description of all exceptions that may be provide on case-by-case basis.
- Associated national objectives for each program.
- Description of the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the disaster recovery programs.
- Projected uses for the CDBG-DR funds, by responsible entity, activity, and geographic area.
- Identification of all allocation criteria involved in method of distribution to local governments or Indian tribes. The criteria must be identified in the Action Plan or substantial amendment and approved by HUD before distributing the funds to a local government or Indian tribe.
- Identification of all criteria, and the relative importance of each criterion, and any eligibility requirements, used to select applications for funding. This is applicable to applications solicited for programs carried out directly.

The amendment must also provide the description of resale or recapture requirements and for which activity the use is proposed if this differs from the description provided in the initial Action Plan. The resale or recapture requirements must clearly describe the terms of resale or recapture and the specific circumstances under which resale or recapture will be used.

3.6.2 Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. HCD will notify HUD five (5) business days before the change is effective.

All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

3.7 Displacement of Persons and Other Entities

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, HCD will coordinate with applicable agencies and entities to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

HCD develops all programs with the intent to minimize displacement of persons or entities, following its existing Residential Anti-displacement and Relocation Assistance Plan (RARAP), in accordance with 24 CFR part 42.325. all program policies and procedures, applications, and technical assistance provided will include policies around displacement. HCD will amend the existing RARAP to reflect the requirements and applicable waivers and requirements as modified by the Consolidated Notice, 87 FR 6381, prior to implementing any activity with 2020 CDBG-DR grants funds.

HCD will minimize displacement of persons or entities as a result of the implementation of CDBG-DR projects by ensuring that all programs are administered in accordance with the

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Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24) and part 104(d) of the Housing and Community Development Act of 1974 and the implementing regulations at 24 CFR part 570.496(a). All recovery programs outlined in this Action Plan will be implemented with the goal of minimizing displacement of individuals and families from their home, whether rental or owned, and/or their neighborhoods.

HCD understands the individualized nature of disaster recovery and the complexities of the recovery process, as well the necessity to join in that process to provide support and guidance through that process. As such, HCD offers a housing counseling program for disaster impacted individuals to include up to two optional counseling opportunities and one required counseling opportunity to support their housing recovery process.

ReCoverCA is the umbrella for HCD's suite of disaster recovery housing programs. Current homeowners entering into the ReCoverCA housing programs receive counseling services on property maintenance, financial management, disaster recovery funding resources, financial and credit literacy, and other areas as needed and appropriate to assist in helping ReCoverCA program participants determine their housing recovery plan, improve their housing conditions, and meet their financial goals.

Traditionally underserved populations, state and federally protected classes, including racial and ethnic minorities, the elderly, veterans, persons with disabilities, persons with limited English proficiency and residents of rural areas, face unique disaster recovery housing, and economic challenges⁷⁵. HCD's ReCoverCA Housing Counseling Program provides expert, unbiased guidance, and information to help families and individuals, particularly the most vulnerable, meet their housing needs through an informed decision-making process.

Rehabilitation or reconstruction projects occasionally require persons to be temporarily displaced from their residential dwelling. Although temporarily displaced persons do not receive the same relocation assistance and payments as persons permanently displaced under the URA, they are entitled to certain rights and protections.

When necessary and appropriate, residential tenants who will not be required to move permanently may be required to relocate temporarily for the project. Temporary relocation should not extend beyond one year before the displaced persons return to their previous unit or location. While not expected, if temporarily relocated residential tenants are displaced for more than one year, tenants are entitled to permanent relocation assistance, which is not inclusive of any temporary relocation assistance previously provide. All conditions of temporary relocation must be reasonable.

HCD will retain a qualified URA Vendor ("Vendor") to provide all services necessary to prepare required relocation plans and implement relocation advisory services for the OOR Program as requested by HUD.

⁷⁵ For more information on federal and state protected classes, see HCD's 2020 Analysis of Impediments to Fair Housing: <https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>.

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The relocation assistance requirements at part 104(d)(2)(A) of the Housing and Community Development Act and 24 CFR 42.350 are waived to the extent that they differ from the requirements of the URA and implementing regulation at 49 CFR part 24, as modified by the Notice, for activities related to disaster recovery. Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation).

The impacts of the disasters are vast and, in many cases, have destroyed homes. In the instance that homes may be rehabilitated, HCD will opt for rehabilitation to minimize the displacement of the homeowner. Additionally, the required affordability periods of at least 55 years for multifamily rental units will also assist with prevention of displacement.

3.8 Protection of People and Property

The State of California has a long history of promoting building design and zoning to protect people and property from harm due to natural disaster. Since the mid-1980s the state has promoted “defensible space” for homeowners living in fire prone areas. In 1983 the nonprofit California Fire Safe Council was established to promote fire safety and to support local community fire safe councils. At the same time the California Wildland Urban Interface (WUI) codes were adopted in 2007 requiring local jurisdictions zoning comply with the state’s standards. HCD is also an official member of the state’s newly established Wildfire Mitigation Advisory Committee. This multi-agency state level committee is established pursuant to AB 642 (2021) to review revised fire severity maps being developed by CAL FIRE and develop a comprehensive wildfire mitigation plan.

Additionally, in 2022, the California Department of Insurance promulgated the Safer from Wildfires Framework and Regulations that lists pre-approved home hardening, defensible space, and community planning actions that homeowners and communities can take that insurers must then factor into their risk ratings and premiums for policyholders.⁷⁶ In order to promote resilience and insurance affordability, HCD’s single family housing programs are aligned with the Safer from Wildfires framework so that program beneficiaries are able to leverage insurance discounts.

3.8.1 Wildland-Urban Interface (WUI) Requirements

The WUI is the area where structures meet or intermingle with undeveloped wildland vegetation. These structures are vulnerable to fire damage, as they are close to fire hazards. In 2003, the California State Fire Marshall, in consultation with the Director of Forestry and Fire Protection and HCD, was tasked with developing statewide fire protection requirements for roofs, exterior walls, structure projections, and structure openings of buildings located in WUI Fire Areas. These requirements became fully effective in 2007, and all new homes built in the WUI Fire Areas must meet these building requirements.

⁷⁶ California Department of Insurance. “Commissioner Lara enforces nation’s first wildfire safety regulation to help drive down cost of insurance.” October 17, 2022. <https://www.insurance.ca.gov/0400-news/0100-press-releases/2022/release076-2022.cfm>

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Through a collaborative effort of the California Department of Forestry and Fire Protection (CAL FIRE), Office of the State Fire Marshal, local fire districts, building associations and other public safety organizations, the WUI codes have been developed to encourage ignition resistant construction in California's fire prone areas. The codes include specific material design and construction standards to maximize ignition resistance.

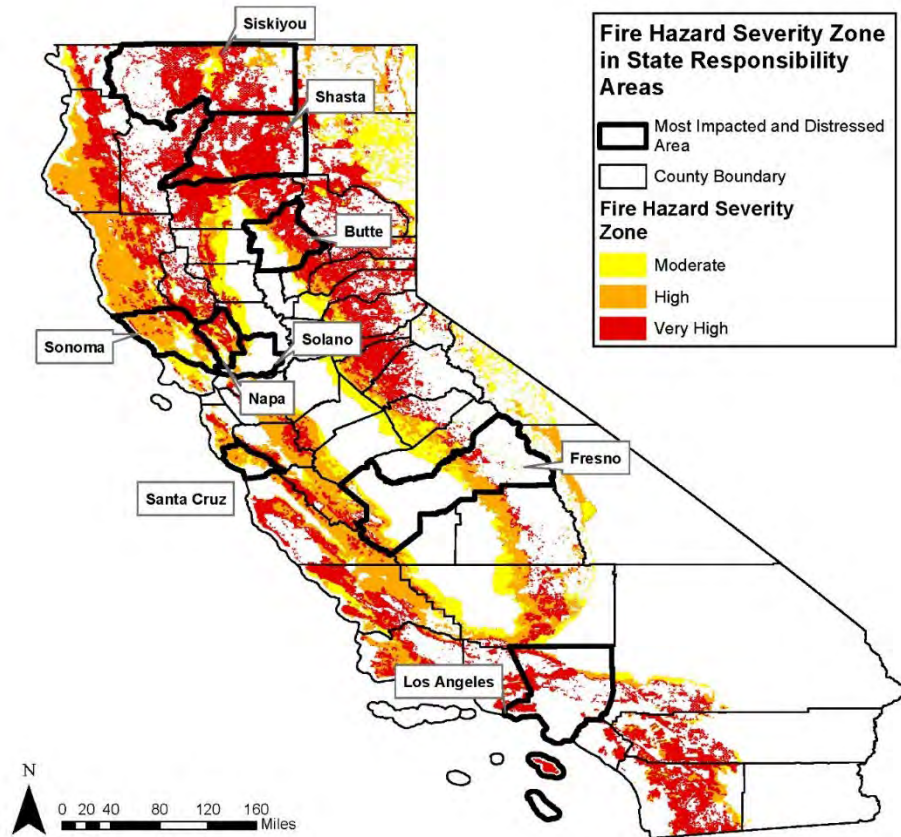
The WUI codes are a requirement for new buildings in Fire Hazard Severity Zones in State Responsibility Areas (where the state is primarily responsible for the prevention and suppression of forest fires), and otherwise adopted at the discretion of local districts responsible for their own fire protection. Most impacted areas are located in State Responsibility Areas. Building standards include specific regulation of materials and design for roofing, attic ventilation, exterior walls, decking and underfloor.⁷⁷ WUI regulations also require that homeowner's clear flammable vegetation within 30 feet of buildings and modify vegetation within 100 feet around buildings to create a defensible space for firefighters to safely protect vulnerable property and to reduce fuels by which fire may continue to grow or spread.

In accordance with the Federal Register Notice requirement to support the adoption and enforcement of modern and/or resilient building codes and mitigation of hazard risk, structures located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland Urban Interface Fire Area designated by the enforcing agency, must comply with Chapter 7A of California's Building Code. The following figure shows the fire hazard areas for the counties impacted by the DR-4558, DR-4569, and DR-4610 disasters.

⁷⁷ California Department of Housing and Community Development - HCD, "CALGreen," HCD Building Standards (HCD, 2019), <https://hcd.ca.gov/building-standards-hcd>.

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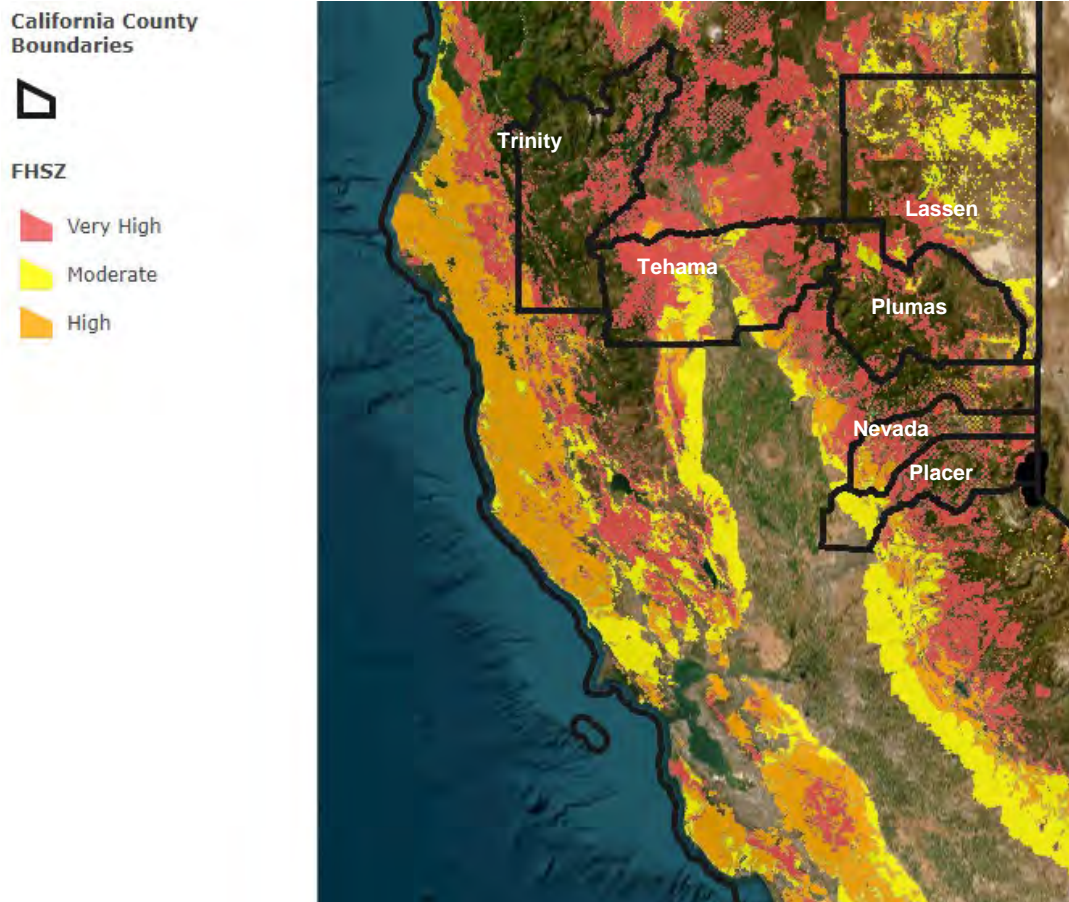
FIGURE 144: DR-4558 & DR-4569 FIRE HAZARD SEVERITY ZONES IN STATE RESPONSIBILITY AREAS



Source: CAL FIRE, U.S. Census Bureau

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FIGURE 145: DR-4610 FIRE HAZARD SEVERITY ZONES IN STATE RESPONSIBILITY AREAS



Source: CAL FIRE, Cal OES

3.8.2 Green and Resilient Building Standards

All CDBG-DR funded projects must identify an industry-recognized green building standard and a minimum energy efficiency standard. These standards are further addressed in housing and infrastructure programs' policies and procedures. Project files will include the requirements incorporated per project.

3.8.3 Federal Green Building Standards

HUD requires all rehabilitation, reconstruction, and new construction to be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigating the impact of future disasters. Wherever feasible, the State of California follows best practices, such as those provided by the U.S. Department of Energy, Home Energy Professionals: Professional Certifications and Standard work specifications. For CDBG-DR funded projects, HUD requires green building standards for replacement and new construction of residential housing. All rehabilitation projects will follow the policies and procedures specified in the HUD Community Planning and Development (CPD) Green Building Retrofit Checklist, to

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the extent applicable, for rehabilitation other than the rehabilitation of substantially damaged residential buildings.

3.8.4 State Green Building Standards

All new construction of residential buildings or reconstruction of substantially damaged buildings must incorporate the state's green building standards. California Green Buildings Standards Code (CALGreen) is California's green building code, enacted as mandatory in 2011, and adopted to address five divisions of building construction and improve public health, safety, and general welfare. The divisions addressed are as follows: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.

In May 2018, the California Energy Commission adopted new building standards that requires all newly constructed homes to include solar photovoltaic systems, effective January 1, 2020. Homes built with the 2019 standards use approximately 53 percent less energy than those built under the 2016 standards.

CAL Green applies to the planning, design, operation, construction, use, and occupancy of nearly every newly constructed building or structure in the state, as well as additions and alterations to existing buildings that increase the building's conditional area, interior volume, or size.⁷⁸

3.8.5 Residential Construction Standards

All residential construction projects will comply with the housing construction codes of the State of California, including all units developed under the Owner-Occupied Housing Recovery Program or the Multifamily Housing Recovery Program. Housing construction codes for building in California follow federal and state laws, regulations, and adaptations for construction of single family and multifamily units.

3.8.6 Appeals Process

HCD will provide a mechanism for homeowners, cities, counties, and other entities to receive timely responses to complaints and appeals in order to maintain quality operations. The Complaints Section provides information on how to file a written complaint to HCD.

Homeowners may appeal the quality of the rehabilitation work and file complaints. HCD will utilize a program implementation contractor to implement the owner-occupied housing program. HCD, along with the program implementation contractor, will develop a robust appeal process that will be outlined in the program policies and procedures.

⁷⁸ "State Fire Marshall Listed Wildland Urban Interface (WUI) Products ," Fire Engineering and Investigations Division (CAL FIRE, December 14, 2021), <https://osfm.fire.ca.gov/media/kmfiqck3/2022-sfm-wui-listed-products-handbook.pdf>.

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The appeals process will include at minimum a two-level process which includes a program appeals process and state level appeals process. Prior to an appeals process, program staff will work with homeowners and contractors to resolve issues and ensure the work completed meets code requirements and program standards. Contractors will be required to provide a one-year warranty period on work performed and will be required to address the homeowner's concerns about the quality and timeliness of the work. The program will develop detailed procedures around process for homeowners given circumstances that the quality of rehabilitation work completed on their home does not meet program standards. The program staff will be required to review and manage the appeals process. In the event that an appeal is not resolved in the program appeals process, the state appeals process will be activated. Further details on the appeals processes will be outlined in the program policies and procedures. Information about the appeals process and filing a complaint will be provided to homeowners with program materials, policies, and procedures. The process and expectations will also be explained to contractors and included within the construction contracts.

3.8.7 Elevation Standards

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three feet above the 100-year floodplain.

Costs of elevation will be included as part of the overall cost of rehabilitation of a property. Many homes in the impacted areas with substantial damage need updates to meet current federal, state and local code requirements when repaired. If a home is within a 100-year floodplain, a cost estimate will be completed and compared with local and national averages comparable to the home's size, number of feet required for elevation and the geography of the location. Any building that has a total cost of repairs greater than 50 percent of the pre-disaster value of the property is considered substantially damaged and will require the entire home to be brought into code compliance.

Where a neighborhood or large tract of houses have substantial damage and also require elevation, the overall impact of elevation on the long-term affordability and maintenance of the housing stock for the area will be considered in determining the best and most reasonable way forward to provide repairs.

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3.8.8 Flood Insurance Requirements

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). HCD may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. HCD is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120 percent AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.
- To ensure adequate recovery, resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:
 - The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
 - The household earns less than 120 percent AMI or the national median and has unmet recovery needs.

3.8.9 Construction Standards

HCD will require quality inspections and code compliance inspections on all projects and places and emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

The State Housing Law Program continuously refines the building standards to ensure they comply with new or changing laws and regulations and develops statewide building standards for new construction of all building types and accessories. The State Housing Law Program also develops the building standards necessary to provide accessibility in the design and construction of all housing other than publicly funded housing. The building standards are published as the California Building Standards Code under the California Code of Regulation, Title 24, and construction standards in the Standard Agreement and or construction agreements, executed as applicable for project type and beneficiary, must meet or exceed all applicable requirements for housing or building construction.

All new construction is required to pass quality inspections and code enforcement inspections over the development of the project, in addition to meeting accessibility requirements of the federal Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and the Americans with Disabilities Act. HCD will require a post construction

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warranty period of one-year for all work performed, including any work completed by subcontractors.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

HCD will use one or more of the above industry-recognized standards for the proposed programs or activities. Further details on these program requirements will be included in the program relevant policies and procedures.

For rehabilitation of non-substantially damaged residential buildings, HCD will follow the guidelines to the extent applicable as specified in the [HUD CPD Green Building Retrofit Checklist](#). When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, HCD will encourage, to the extent practicable, implementation of design and construction standards that will withstand extreme weather events and the impacts of climate change.

3.8.10 Cost Controls

All construction activities that utilize CDBG-DR funds, including the mitigation set-aside, must be reasonable and consistent with market costs at the time and place of construction or procurement. To comply with this requirement, HCD will follow the procedures outlined in Section VI, Part N of the HCD CDBG-DR Grants Administration Manual (CDBG-DR GAM) to complete and document independent cost estimates (ICE), cost or price analyses, and cost reasonableness determination within each of its procurements. Additionally, for OOR specifically, HCD's contractors are required to use estimating software such as Xactimate for all estimating to ensure cost reasonable industry standards. Specific parameters regarding cost reasonableness requirements will also be outlined within policies and procedures on a program-by-program basis.

Subrecipients must take into account the costs and benefits of incorporating hazard mitigation measures to protect against the specific identified impacts of future extreme weather events and other natural hazards.

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3.8.11 Contractors Standards

Contractors selected under HCD and its Subrecipients will make every effort to provide opportunities to low and very-low income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. HCD will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system. Policies and procedures for the OOR Program will include a description of the standards to be established for construction contractors performing work in the jurisdiction and the mechanisms that HCD will use to assist beneficiaries in responding to contractor fraud, poor quality work and associated issues as well as details on the warranty period post construction. The OOR policy and procedures will also address the program's mechanism for homeowners to appeal rehabilitation work.

The OOR Program will follow the program's policies and procedures to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.

3.8.12 Preparedness, Mitigation and Resiliency

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

To integrate hazard mitigation and resilience planning with recovery efforts, HCD will promote sound, sustainable, long-term recovery planning informed by post-disaster evaluation of hazard risk, including climate-related hazards, and the creation of resilience performance metrics.

This Action Plan includes a mitigation needs assessment that reviews the hazards and risks to the 2020 impacted communities and a demographic analysis examining the vulnerable populations within the impacted area. HCD is not currently proposing to use the 2020 allocation to fund a resilience planning program, but HCD is proposing to use its CDBG-DR Mitigation set-aside to protect both single family and multifamily properties, with a priority for LMI and underserved populations. This Action Plan provides information on California State Plans and funding sources for resilience planning in the Mitigation Needs Assessment section (2.d. Mitigation Only Activities).

HUD defines resilience for CDBG-DR grantees as a "community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks"⁷⁹ HCD's construction related programs include construction standards that will incorporate resilience and hazard mitigation measures into CDBG-DR funded activities.

In response to 87 FR 6370, this Action Plan must align with existing FEMA or other state, local, or tribal hazard mitigation plans. In addition, mitigation measures must be incorporated when

⁷⁹ "Climate Resilience and Disaster Recovery at HUD" (Disaster Recovery & Special Issues Division - Office of Community Planning & Development, n.d.), https://www.hud.gov/sites/dfiles/CPD/documents/Climate_Action_Equity_and_Recovery_Slides.pdf.

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carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds.

For these construction activities for residential or non-residential structures, HCD must establish resilience performance metrics for the activity including:

- An estimate of the projected risk to the completed activity from natural hazards, including those hazards that are influenced by climate change.
- Identification of the mitigation measures that will address the projected risks, and
- An assessment of the benefit of the grantee's measures through verifiable data.

For OOR and MHP, HCD will take into account the fire severity zones in which the funded OOR and MHP properties are located to assess how CAL FIRE and local jurisdictions make those determinations to include how climate change impacts wildfire risk. Additionally, HCD will consider fire-resistant characteristics required for compliance with Wildland Urban Interface (WUI) code as well as any building methods and materials that the program is using that will exceed WUI standards.

HCD will assist subrecipients to define appropriate resilience metrics for infrastructure projects with the FEMA PA Match Program.

3.8.13 Broadband Infrastructure in Housing

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,

The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or

The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

3.8.14 Cost-Effectiveness

Owner Occupied Housing Rehabilitation and Reconstruction Program (OOR)

The primary objective of the OOR Program is the provision of decent, safe, and sanitary housing in the areas impacted by the DR-4558 and DR-4569 disasters. Additionally, the program is designed to ensure that the housing needs of very-low, low-, and moderate-income households and vulnerable populations, including individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

The program will provide rehabilitation or reconstruction assistance to eligible applicants based on the extent of damage to their primary residences. All projects will incorporate wildfire mitigation measures, including the use of ignition-resistant building materials and the creation of defensible space, reducing risk from future wildfire disasters.

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The maximum amount of assistance available for rehabilitation or reconstruction is \$500,000 per damaged structure after applying any duplication of benefits reductions. Reconstruction is permissible where the total cost of rehabilitation is greater than the cost to reconstruct or where rehabilitation is otherwise technically infeasible. Reconstruction is defined as the rebuilding of a structure on the same site in substantially the same manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

In addition to the grant award for rehabilitation or reconstruction, the mitigation set-aside will assist in covering home hardening costs to include the cost of WUI construction codes; the set-aside is available in amounts not to exceed 10 percent of each applicant's rehabilitation or reconstruction CDBG-DR award.

Not suitable for rehabilitation

HCD defines a structure as not suitable for rehabilitation in two scenarios:

- The cost for rehabilitation is over 50 percent of the pre-disaster fair market value of the home.
- The cost for rehabilitation exceeds the cost to reconstruct the home.

Demonstrable Hardship

HUD requires HCD to define "demonstrable hardship" and any related exceptions to program policies for applicants who demonstrate undue hardship. A demonstrable hardship is defined as a substantial change in a household's situation that prohibits or severely affects their ability to provide and maintain a minimal standard of living or basic necessities, such as food, housing, clothing and transportation, causing economic distress well beyond mere inconvenience. A demonstrable hardship must occur after the fires and must be documented with objective evidence.

The demonstrable hardship must be of a severe, involuntary, and unexpected nature, and not generally for the same reasons shared with other households affected by the disaster. Examples of demonstrable hardship may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. However, there is no one event that automatically defines a demonstrable hardship. HCD will consider each applicant's overall situation if a demonstrable hardship is claimed, and documentation can be provided showing the cause and other factors relevant to the issue of demonstrable hardship.

Multifamily Housing Program (MHP)

The MHP per-unit maximum loan assistance is consistent with the Basic Statutory Mortgage Limits, Section 234, adjusted for high-cost areas as published by the Federal Housing Administration (FHA). As a state-wide program with a variety of housing markets and corresponding costs, HCD uses the FHA limits as a federally established industry standard and safe harbor for cost reasonableness on a per-unit basis for housing serving low-income

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households. Consistent with other HUD affordable housing funding sources, these per-unit loan limits ensure an appropriate level of federal investment in multifamily projects on a per-unit basis. This policy direction encourages leveraging with HOME, Tax Credits, State MHP, and other available affordable housing resources.

FIGURE 146: MULTIFAMILY HOUSING PROGRAM MAXIMUM PER-UNIT SUBSIDY

Bedrooms	Maximum Subsidy
0	\$179,723
1	\$206,024
2	\$250,530
3	\$324,105
4	\$355,766

For MHP loan limit calculations, the unit count may include the number of Restricted Units within the project, including units with long-term, low-income or occupancy restrictions imposed by HCD, Tax Credit Allocation Committee (TCAC), or other public agencies and restricted at no greater than 65 percent of AMI. Awards of CDBG-DR funds shall not exceed the lesser of the demonstrated need or the MHP Maximum Per-Unit Loan Limit calculation.

3.8.15 Duplication of Benefits

A duplication of benefits (DOB) occurs when an impacted person, household, business, government, or other entity receives financial assistance from multiple sources such as FEMA, USACE, EDA, insurance, etc. for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. A DOB review will be applied to all CDBG-DR activities. In determining an applicant’s unmet need, subrecipients must follow HCD’s DOB policy. The process for determining any duplicates includes assessing the need, identifying the total assistance available to the applicant deducting benefits received for a different purpose, deducting funds received for the same purpose but different eligible use, and funds not available. Once the duplicated funds have been identified and subtracted from the unmet need amount, any remaining unmet need can be assisted with the CDBG-DR funds.

All agreements between HCD and beneficiaries, and HCD and subrecipients, require all sources of possible duplicative assistance to be disclosed to HCD. Additionally, a subrogation clause contained in these agreements requires any person who receives further assistance to repay that assistance if the amount of assistance exceeds the funding required for the project.

4. Program Budget

Overview. HCD is the lead agency and responsible entity for administering \$231,203,000 in CDBG-DR funds allocated for 2020 disasters and \$24,408,000 for 2021 disasters. These

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programs include a suite of housing recovery programs to address the unmet recovery need in the HUD MID areas: an Owner-Occupied Housing Rehabilitation and Reconstruction Program (OOR) (2020), a Single Family Reconstruction Program (2021), a Single Family Mitigation Program (2020), a Homebuyer Assistance Program (HBA) (2020), and a Multifamily Housing Program (MHP) (2020). For 2020 funds, the FEMA PA Program provides for CDBG-DR funds to serve as the local match to assist infrastructure projects in FEMA Categories C through E.

4.1 Program Budget - 2020 & 2021

FIGURE 147: PROGRAM BUDGET – 2020

Program Category	Program	Budget	HUD Identified MID Budget	Grantee Identified MID Budget	% of Allocation	Maximum Award	National Objective	Program Category
Housing	Rehab	\$45,838,488	\$45,838,488	\$0	20%	\$0	LMI	Housing
	Buyout	\$0	\$0	\$0	0%	\$0	Not applicable	
	New Construction	\$128,347,766	\$128,347,766	\$0	56%	\$0	LMI	
	Other	\$9,167,698	\$9,167,698	\$0	4%	\$0	LMI	
Economic Revitalization	Workforce Training	\$0	\$0	\$0	0%	\$0	Not applicable	Economic Revitalization
	Business Grants	\$0	\$0	\$0	0%	\$0	Not applicable	
	Other	\$0	\$0	\$0	0%	\$0	Not applicable	
Infrastructure	Water/sewer Improvements	\$0	\$0	\$0	0%	\$0	Not applicable	Infrastructure
	Health Facilities	\$0	\$0	\$0	0%	\$0	Not applicable	
	Other	\$7,639,748	\$7,639,748	\$0	3%	\$0	LMI and Urgent Need	
Public Services	Legal Services	\$0	\$0	\$0	0%	\$0	Not applicable	Public Services
	Housing Counseling	\$0	\$0	\$0	0%	\$0	Not applicable	
	Other	\$0	\$0	\$0	0%	\$0	Not applicable	
Mitigation	Mitigation	\$28,649,150	\$28,649,150	\$0	12%	\$0	LMI	Mitigation
Admin	Admin	\$11,560,150	\$11,560,150	\$0	5%	\$0	Not applicable	Admin
Planning	Planning	\$0	\$0	\$0	0%	\$0	Not applicable	Planning
Total	\$231,203,000	\$231,203,000	\$0	100%		\$0		Total

Data Source(s): 2020 Unmet Needs Analysis

FIGURE 148: PROGRAM BUDGET – 2021

Program Category	Program	Budget	HUD Identified MID Budget	Grantee Identified MID Budget	% of Allocation	Maximum Award	National Objective	Program Category
Housing	Rehab	\$20,162,800	\$20,162,800	\$0	83%	\$0	LMI	Housing
	Buyout	0	0	\$0	0	\$0	Not applicable	
	New Construction	0	0	\$0	0	\$0	Not applicable	
	Other	0	0	\$0	0	\$0	Not applicable	

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Economic Revitalization	Workforce Training	0	0	\$0	0	\$0	Not applicable	Economic Revitalization
	Business Grants	0	0	\$0	0	\$0	Not applicable	
	Other	0	0	\$0	0	\$0	Not applicable	
Infrastructure	Water/sewer Improvements	0	0	\$0	0	\$0	Not applicable	Infrastructure
	Health Facilities	0	0	\$0	0	\$0	Not applicable	
	Other	0	0	\$0	0	\$0	Not applicable	
Public Services	Legal Services	0	0	\$0	0	\$0	Not applicable	Public Services
	Housing Counseling	0	0	\$0	0	\$0	Not applicable	
	Other	0	0	\$0	0	\$0	Not applicable	
Mitigation	Mitigation	\$3,024,800	\$3,024,800	\$0	12%	\$0	LMI	Mitigation
Admin	Admin	\$1,220,400	\$1,220,400	\$0	5%	\$0	Not applicable	Admin
Planning	Planning	0	0	\$0	0	\$0	Not applicable	Planning
Total	\$24,408,000	\$24,408,000	\$24,408,000	\$0	100%	\$0		Total

Data Source(s): 2021 Unmet Needs Analysis

4.2 Expenditure Projections and Outcomes

FIGURE 149: 2020 EXPENDITURE PROJECTIONS

Program	Budget	2022		2023		
		Q4	Q1	Q2	Q3	Q4
Administration	\$11,560,150	\$325,000	\$385,000	\$425,000	\$425,000	\$425,000
2020 Owner-Occupied Recon/Rehab (OOR)	\$45,838,488	\$72,500	\$72,500	\$165,000	\$175,000	\$500,000
2020 OOR Mitigation	\$21,486,863	\$10,000	\$50,000	\$75,000	\$75,000	\$85,000
2020 Homebuyer Assistance Program	\$9,167,698	\$5,000	\$7,500	\$47,500	\$300,000	\$750,000
2017 Multifamily Housing Program (MHP)	\$128,347,766	\$10,000	\$300,000	\$300,000	\$500,000	\$2,500,000
2017 MHP Mitigation	\$7,162,287	\$10,000	\$10,000	\$10,000	\$20,000	\$40,000
FEMA PA Match	\$7,639,748	\$10,000	\$10,000	\$250,000	\$500,000	\$750,000
TOTAL	\$231,203,000	\$117,500	\$450,000	\$847,500	\$1,570,000	\$4,625,000

Program	2024			
	Q1	Q2	Q3	Q4
Administration	\$450,000	\$450,000	\$475,000	\$475,000
2020 Owner-Occupied Recon/Rehab (OOR)	\$500,000	\$750,000	\$1,000,000	\$2,800,000
2020 OOR Mitigation	\$112,500	\$225,000	\$225,000	\$385,000
2020 Homebuyer Assistance Program	\$400,000	\$400,000	\$800,000	\$800,000
2017 Multifamily Housing Program (MHP)	\$4,000,000	\$5,500,000	\$6,750,000	\$6,500,000
2017 MHP Mitigation	\$80,000	\$100,000	\$100,000	\$150,000

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FEMA PA Match	\$750,000	\$1,000,000	\$1,000,000	\$1,000,000
TOTAL	\$5,842,500	\$7,975,000	\$9,875,000	\$11,635,000

Program	2025			
	Q1	Q2	Q3	Q4
Administration	\$585,000	\$650,000	\$750,000	\$850,000
2020 Owner-Occupied Recon/Rehab (OOR)	\$3,200,000	\$5,200,000	\$6,750,000	\$6,750,000
2020 OOR Mitigation	\$1,290,000	\$1,575,000	\$1,495,000	\$1,365,000
2020 Homebuyer Assistance Program	\$800,000	\$1,750,000	\$1,600,000	\$785,000
2017 Multifamily Housing Program (MHP)	\$7,855,000	\$7,855,000	\$8,850,000	\$9,950,000
2017 MHP Mitigation	\$400,000	\$615,000	\$750,000	\$785,000
FEMA PA Match	\$1,000,000	\$750,000	\$500,000	\$119,748
TOTAL	\$14,545,000	\$17,745,000	\$19,945,000	\$19,754,748

Program	2026			
	Q1	Q2	Q3	Q4
Administration	\$850,000	\$850,000	\$750,000	\$550,000
2020 Owner-Occupied Recon/Rehab (OOR)	\$6,750,000	\$4,870,000	\$2,600,000	\$1,500,000
2020 OOR Mitigation	\$3,400,000	\$2,950,000	\$2,750,000	\$1,395,000
2020 Homebuyer Assistance Program	\$716,500	\$3,600	\$2,598	\$0
2017 Multifamily Housing Program (MHP)	\$9,900,000	\$9,900,000	\$8,550,000	\$8,350,000
2017 MHP Mitigation	\$1,150,000	\$1,250,000	\$735,000	\$500,000
FEMA PA Match	\$0	\$0	\$0	\$0
TOTAL	\$21,916,500	\$18,973,600	\$14,637,598	\$11,745,000

Program	2027			
	Q1	Q2	Q3	Q4
Administration	\$450,000	\$350,000	\$350,000	\$275,000
2020 Owner-Occupied Recon/Rehab (OOR)	\$1,500,000	\$250,000	\$125,000	\$125,000
2020 OOR Mitigation	\$1,250,000	\$960,000	\$765,000	\$625,000
2020 Homebuyer Assistance Program	\$0	\$0	\$0	\$0
2017 Multifamily Housing Program (MHP)	\$7,575,000	\$6,750,000	\$5,500,000	\$4,500,000
2017 MHP Mitigation	\$225,000	\$100,000	\$65,000	\$20,000
FEMA PA Match	\$0	\$0	\$0	\$0
TOTAL	\$10,550,000	\$8,060,000	\$6,455,000	\$5,270,000

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Program	2028			TOTAL
	Q1	Q2	Q3	
Administration	\$150,000	\$150,000	\$165,150	\$11,560,150
2020 Owner-Occupied Recon/Rehab (OOR)	\$85,500	\$60,000	\$37,988	\$45,838,488
2020 OOR Mitigation	\$299,000	\$85,863	\$39,500	\$21,486,863
2020 Homebuyer Assistance Program	\$0	\$0	\$0	\$9,167,698
2017 Multifamily Housing Program (MHP)	\$3,280,000	\$2,690,000	\$482,766	\$128,347,766
2017 MHP Mitigation	\$20,000	\$15,000	\$12,287	\$7,162,287
FEMA PA Match	\$0	\$0		\$7,639,748
TOTAL	\$3,684,500	\$2,850,863	\$572,541	\$231,203,000

FIGURE 150: 2021 EXPENDITURE PROJECTIONS

Program	Budget	2023	2024			
		Q4	Q1	Q2	Q3	Q4
Administration	\$1,220,400	0	0	0	\$122,040	\$122,040
2021 Single Family Reconstruction	\$20,162,800	0	0	0	\$2,016,280	\$2,016,280
2021 Single Family Mitigation	\$3,024,800	0	0	0	\$302,480	\$302,480
TOTAL	\$24,408,000	0	0	0	\$2,440,800	\$2,440,800

Program	2025			
	Q1	Q2	Q3	Q4
Administration	\$122,040	\$122,040	\$122,040	\$122,040
2021 Single Family Reconstruction	\$2,016,280	\$2,016,280	\$2,016,280	\$2,016,280
2021 Single Family Mitigation	\$302,480	\$302,480	\$302,480	\$302,480
TOTAL	\$2,440,800	\$2,440,800	\$2,440,800	\$2,440,800

Program	2026			
	Q1	Q2	Q3	Q4
Administration	\$122,040	\$122,040	\$122,040	\$122,040
2021 Single Family Reconstruction	\$2,016,280	\$2,016,280	\$2,016,280	\$2,016,280
2021 Single Family Mitigation	\$302,480	\$302,480	\$302,480	\$302,480
TOTAL	\$2,440,800	\$2,440,800	\$2,440,800	\$2,440,800

Program	2027			
	Q1	Q2	Q3	Q4

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Administration	0	0	0	0
2021 Single Family Reconstruction	0	0	0	0
2021 Single Family Mitigation	0	0	0	0
TOTAL	0	0	0	0

Program	2028			
	Q1	Q2	Q3	Q4
Administration	0	0	0	0
2021 Single Family Reconstruction	0	0	0	0
2021 Single Family Mitigation	0	0	0	0
TOTAL	0	0	0	0

Program	2029			
	Q1	Q2	Q3	Q4
Administration	0	0	0	0
2021 Single Family Reconstruction	0	0	0	0
2021 Single Family Mitigation	0	0	0	0
TOTAL	0	0	0	0

FIGURE 151: 2020 EXPENDITURE OUTCOMES

Program	Accomplishments	2022	2023			
		Q4	Q1	Q2	Q3	Q4
2020 Owner-Occupied Recon/Rehab (OOR)	# of Single Family Units Completed	0	0	0	0	0
2020 OOR Mitigation	# of Single Family Units Completed	0	0	0	0	10
2020 Homebuyer Assistance Program	# of Homebuyers Assisted	0	0	0	0	1
2020 Multifamily Housing Program (MHP)	# of Multifamily Units Completed	0	0	0	0	0
2020 MHP Mitigation	# of MHP Properties Mitigated Against Wildfire	0	0	0	0	0
2020 FEMA PA Match Program	# of FEMA PA Match Infrastructure Projects Completed	0	0	0	0	0

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TOTAL		0	0	0	0	11
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		2024			
Program	Accomplishments	Q1	Q2	Q3	Q4
2020 Owner-Occupied Recon/Rehab (OOR)	# of Single Family Units Completed		2	2	3
2020 OOR Mitigation	# of Single Family Units Completed	15	20	20	25
2020 Homebuyer Assistance Program	# of Homebuyers Assisted	1	2	2	2
2020 Multifamily Housing Program (MHP)	# of Multifamily Units Completed	0	0	10	15
2020 MHP Mitigation	# of MHP Properties Mitigated Against Wildfire	0	0	0	0
2020 FEMA PA Match Program	# of FEMA PA Match Infrastructure Projects Completed	0	0	0	0
TOTAL		16	24	34	45

		2025			
Program	Accomplishments	Q1	Q2	Q3	Q4
2020 Owner-Occupied Recon/Rehab (OOR)	# of Single Family Units Completed	4	6	7	9
2020 OOR Mitigation	# of Single Family Units Completed	25	20	20	20
2020 Homebuyer Assistance Program	# of Homebuyers Assisted	2	2	2	2
2020 Multifamily Housing Program (MHP)	# of Multifamily Units Completed	25	25	45	45
2020 MHP Mitigation	# of MHP Properties Mitigated Against Wildfire	0	0	0	3
2020 FEMA PA Match Program	# of FEMA PA Match Infrastructure Projects Completed	0	0	4	5
TOTAL		56	53	78	84

		2026			
Program	Accomplishments	Q1	Q2	Q3	Q4

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2020 Owner-Occupied Recon/Rehab (OOR)	# of Single Family Units Completed	7	8	8	4
2020 OOR Mitigation	# of Single Family Units Completed	20	10	10	10
2020 Homebuyer Assistance Program	# of Homebuyers Assisted	1	1	1	0
2020 Multifamily Housing Program (MHP)	# of Multifamily Units Completed	50	50	50	40
2020 MHP Mitigation	# of MHP Properties Mitigated Against Wildfire	6	6	2	2
2020 FEMA PA Match Program	# of FEMA PA Match Infrastructure Projects Completed				
TOTAL		84	75	71	56

		2027			
Program	Accomplishments	Q1	Q2	Q3	Q4
2020 Owner-Occupied Recon/Rehab (OOR)	# of Single Family Units Completed	2	2	2	2
2020 OOR Mitigation	# of Single Family Units Completed	6	7	7	7
2020 Homebuyer Assistance Program	# of Homebuyers Assisted				
2020 Multifamily Housing Program (MHP)	# of Multifamily Units Completed	30	21	10	10
2020 MHP Mitigation	# of MHP Properties Mitigated Against Wildfire	2	2	2	3
2020 FEMA PA Match Program	# of FEMA PA Match Infrastructure Projects Completed				
TOTAL		40	32	21	22

		2028			TOTAL
Program	Accomplishments	Q1	Q2	Q3	
2020 Owner-Occupied Recon/Rehab (OOR)	# of Single Family Units Completed	2	0	0	70
2020 OOR Mitigation	# of Single Family Units Completed	3	0	0	255
2020 Homebuyer Assistance Program	# of Homebuyers Assisted	0	0	0	19
2020 Multifamily Housing Program (MHP)	# of Multifamily Units Completed	7	0	0	433

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2020 MHP Mitigation	# of MHP Properties Mitigated Against Wildfire	2	0	0	30
2020 FEMA PA Match Program	# of FEMA PA Match Infrastructure Projects Completed	0	0	0	9
TOTAL		14	0	0	807

FIGURE 152: 2021 EXPENDITURE OUTCOMES

Program	Accomplishments	2023		2024		
		Q4	Q1	Q2	Q3	Q4
2021 Single Family Reconstruction	#single family units completed (32)	0	0	0	0	0
2021 Single Family Mitigation	# single family units retrofitted (36)	0	0	0	0	0
TOTAL	68	0	0	0	0	0

Program	2025			
	Q1	Q2	Q3	Q4
2021 Single Family Reconstruction	0	2	5	5
2021 Single Family Mitigation	0	5	6	5
TOTAL	0	7	11	10

Program	2026			
	Q1	Q2	Q3	Q4
2021 Single Family Reconstruction	5	5	5	5
2021 Single Family Mitigation	5	5	5	5
TOTAL	10	10	10	10

Program	2027			
	Q1	Q2	Q3	Q4
2021 Single Family Reconstruction	0	0	0	0
2021 Single Family Mitigation	0	0	0	0
TOTAL	0	0	0	0

Program	2028			
	Q1	Q2	Q3	Q4
2021 Single Family Reconstruction	0	0	0	0

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2021 Single Family Mitigation	0	0	0	0
TOTAL	0	0	0	0

Program	2029				Total
	Q1	Q2	Q3	Q4	
2021 Single Family Reconstruction	0	0	0	0	32
2021 Single Family Mitigation	0	0	0	0	36
TOTAL	0	0	0	0	

4.3 Connection to Unmet Needs

As required by the FRN, 87 FR 6364, published February 3, 2022, and 88 FR 3198, published on January 18, 2023, HCD will allocate at least 80 percent of the funds to address unmet needs within HUD-identified “most impacted and distressed” (MID) areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a DR-4558, DR-4569, or DR-4610 presidential major disaster declaration. However, due to the limited disaster recovery funds available and the amount of unmet need remaining in the MID areas, this Action Plan directs 100 percent of the funds to address unmet needs with the HUD-identified MID areas.

This Action Plan primarily considers and addresses the unmet need in the MID. Programs are developed to address the most severe unmet needs and in full compliance with the Federal Register Notice. The level of unmet recovery need identified in both eligible 2020 and 2021 counties, as well as the MID counties, far exceeds the amount available through the current 2020 and 2021 funding allocation. With limited funds available, HCD must prioritize its limited funding on areas that will make the most impact for low and moderate income, federally protected classes, and vulnerable populations. In an effort to maximize its impact, HCD proposes to use the 2020 funds to focus on unmet housing need and infrastructure funding that can support housing development and use 2021 funds to focus exclusively on unmet housing need.

As discussed in the Unmet Needs section, there are unmet recovery needs across all eligible activities. The needs assessment influenced the development and prioritization of recovery activities outlined in the Action Plan. HCD consulted with affected citizens, stakeholders, local governments, and public housing authorities to assess needs. Following the guidance in the federal register notice, along with California’s existing affordable housing crisis, the state will focus its 2020 CDBG-DR resources primarily on housing programs in MID areas, with the remaining funding for FEMA PA match for housing-related infrastructure projects in MID areas. Similarly, the state will focus its 2021 CBDG-DR resources exclusively on housing, given the relatively smaller size and the allocation and tremendous unmet housing recovery needs.

HCD acknowledges that any proposed CDBG-DR funded programs must also consider eligible CDBG activities, must be responsive to CDBG national objectives, must comply with all

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regulatory guidance issued to HCD, and must consider best practices established through similar recovery initiatives.

In accordance with 24 CFR 570.208, all CDBG-DR and Mitigation funded activities must satisfy a national objective, and at least 70 percent of all program funds will benefit LMI persons or households. Each program description has detailed information on the national objective it is projected to meet. HCD anticipates that through program design and implementation, all programs will either meet the low to moderate income housing national objective, low to moderate area benefit national objective, or urgent need national objective. The Multifamily Housing Program (MHP) activities under this Action Plan, which integrates a portion of the Mitigation set-aside, are required to meet the LMI National Objective, therefore 100 percent of the MHP budget will benefit LMI persons or households. The Owner-Occupied Rehabilitation and Reconstruction Program, with utilization of the Mitigation set-aside, prioritizes LMI persons and households.

As required by the Federal Register notice, 87 FR 6364, this Action Plan must describe the method of distribution of funds and the descriptions of specific programs or activities HCD will carry out directly.

This Action Plan outlines the following:

- Eligible affected areas and subrecipients;
- Criteria for eligibility;
- Methodology used to distribute funds to subrecipients;
- Activities for which funding may be used; and
- Program requirements, including Duplication of Benefits analysis.

Allocations for the CDBG-DR programs are based on needs as identified through an analysis of FEMA IA and FEMA PA claims. The primary consideration in developing effective CDBG-DR programming is the unmet needs analysis. Programs are developed to address the most severe unmet needs and in full compliance with the Federal Register Notice. The Needs Assessment shows that total unmet recovery needs surpass the CDBG-DR funds allocated to the state by HUD. HCD based programming decisions on best available data from multiple sources, including FEMA, SBA, private insurance, state agencies, and local governments, broad engagement with the public and stakeholders, and planning discussions about program typologies and design options to maximize the benefits of the available funding.

The allocations for each recovery program are based on the unmet needs analysis, which identified housing and infrastructure as a crucial unmet recovery need. HCD also performed a mitigation needs assessment to inform activities proposed for the mitigation set-aside.

4.3.1 Housing Recovery

2020 Disaster

In budgeting the disaster recovery dollars for unmet need, HCD is allocating 96 percent of these program funds to meet housing recovery unmet need, with 70 percent of the housing recovery funds budgeted to the Multifamily Housing Program (MHP), 25 percent to the Owner-Occupied Rehabilitation and Reconstruction Program (OOR), and the remaining 5 percent to the

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Homebuyer Assistance Program (HBA). HCD is incorporating the Mitigation set-aside budget into the OOR and MHP; 5 percent of the total Mitigation set-aside will provide for grant administration and the remaining 95 percent, \$28,649,150, will serve mitigation needs for single family homes through the OOR and assist in hardening MHP properties against future wildfire threat. HCD has determined the mitigation budget for OOR and MHP in consideration that the cost to mitigate to the Wildland-Urban Interface Code (WUI), estimated at \$50,000, deters LMI homeowners of single-family properties, who cannot easily leverage funds, from mitigating their properties to meet the WUI code. HCD's first-tier priority for the OOR is to benefit single family households that include persons with disabilities, and the second-tier priority will serve LMI households. HCD acknowledges that MHP developers and existing MHP property owners have greater ability and access to leverage funds to mitigate properties to the WUI code, therefore the budget split for the mitigation set-aside prioritizes 75 percent of the available program funds to OOR Mitigation and 25 percent to MHP Mitigation. As HCD moves to the application and NOFA phases for OOR and MHP, and if factors otherwise indicate that the existing Mitigation set-aside budget does not align with actual mitigation needs in the HUD MID areas, HCD will propose a change to the budget through a substantial amendment.

2021 Disaster

Due to the limited allocation and enormous unmet housing recovery needs, HCD is budgeting the full amount of disaster recovery funds for unmet housing recovery needs in the MID. Of the \$286,090,478 in unmet recovery needs determined in HCD's alternative methodology, \$262,732,924 (92 percent) are unmet housing recovery needs. Since the number of homeowner and renter FEMA verified losses in the MID were similar, HCD aims to serve both household types. The full \$20,162,800 will be used on a Single Family Reconstruction Program that will build structures destroyed in the qualifying event and serve both LMI homeowners and renters. The program beneficiary, either a primary resident or renter, must be LMI.

The full \$3,024,800 mitigation allocation will be used on a Single Family Mitigation program that will support home hardening and vegetation management for existing owner-occupied single family homes and single family rentals not destroyed by the qualifying event. The Mitigation program beneficiaries must also be LMI.

4.3.2 Infrastructure

For the 2020 disaster allocation, overall allocation to the infrastructure recovery program, 4 percent of the program allocation to unmet needs, is based on the unmet needs analysis for the local match for FEMA PA projects for categories C-G as identified through an analysis of FEMA PA claims. HCD anticipates that the budgeted funds to provide for the unmet need for local match with FEMA PA will cover the total estimated unmet need for local match, therefore providing a significant direct impact for those entities in the HUD MID, and a significant indirect impact to the beneficiaries served by these jurisdictions. Supporting these communities with funds to cover local match may in turn allow these communities, significantly impacted by the 2020 wildfires, to focus impacted budgets to provide recovery services and other public services for underserved populations within these jurisdictions. Leveraging the CDBG-DR funds with FEMA PA funds maximizes the allocation's impact to meet unmet need from the DR-4558 and

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DR-4699 wildfires. Given the small allocation size for DR-4610, HCD is not allocating any funds for infrastructure activities in the 2021 MID.

4.3.3 Impact and Needs of Protected Classes and Vulnerable Populations

In addition to the unmet needs, the state has calculated the impact and needs of protected classes and vulnerable populations into each program design. The 2020 fires predominately impacted rural communities, which has lower population density in comparison to disaster impacting urban areas. According to the U.S. Census Bureau, the MID area for the 2020 disaster makes up 31 percent of the state's population and within the MIDs 24 percent of the population do not identify as White/Caucasian, and 11 percent identified having a disability. The 2021 MID is has 18,844 people, including 27.7 percent individuals over age 65; 16.8 percent persons with a disability; and 11.5 percent are persons who are not White/Caucasian.

The rural nature of the disaster does not change the state's commitment to affirmatively furthering fair housing through its CDBG-DR and CDBG-MIT programs. HCD strategically designed its recovery and mitigation programs to prioritize the rural areas impacted by fire, including a focus on federally protected classes. To ensure it affirms its commitment to fair housing, meeting both federal laws and requirements, and state laws and goals, HCD proposes the following measures for each of its 2020 and 2021 CDBG-DR programs to meet the needs of federally protected classes and vulnerable populations and ensure equal access to all CDBG-DR funded programs.

- OOR: In addition to providing priority for vulnerable populations and those with access to critical needs through the tiering process outlined in the program section, the state has contracted with an outside vendor to manage the program. Part of their role is to complete extensive outreach to the population impacted by the fire. Given the rural nature of the impacted areas, this includes not only outreach in the impacted areas, key stakeholder and community groups, but outreach to areas around the fire which are currently housing impacted homeowners.
- Single Family Reconstruction: The program will leverage the existing OOR Program infrastructure and will exclusively serve LMI households, many of whom are elderly or have a disability, but will also include single family rental reconstruction.
- Single Family Mitigation: The program will leverage the existing OOR Mitigation Program infrastructure and will help LMI homeowners and affordable single family rental landlords to harden their homes to wildfires.
- HBA: The HBA program will follow the same robust outreach to potential applicants as OOR and offers an alternative for those impacted residents and the economic ability to relocate to a home in a lower risk fire area. For some households, this move will create additional opportunities for stable housing and job opportunities, a better quality of life, and lower impacts for future fires.
- MHP: For the 2020 program, the state will manage the implementation of the program which has standardized the thresholds for the program. This uniformity allows the program to continue to leverage funding and develop vulnerable populations and protected classes. The program requires Affordable Housing Marketing Plans (AFHMP) as part of the program thresholds.

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- Infrastructure: The infrastructure of a community is the backbone of that community. In order to ensure that the community can support the return of the citizens and business, key critical infrastructure must be rebuilt. Through the FEMA PA Match program, the state will utilize CDBG funds as the nonfederal share match. Each project must meet the standards set by FEMA and HCD will track and monitor the impacts to the impacted community and its protected classes and vulnerable populations. Fixing these critical needs ensures that the community can rebuild in an equitable manner and provide access to functional services to the entire population.

4.4 Leveraging Funds

HCD anticipates leveraging CDBG-DR funds with the FEMA Public Assistance (PA) funds to address unmet needs for infrastructure.

Over the last three decades, HCD has provided more than \$3 billion in funding for the development of affordable housing and associated infrastructure. HCD manages non-entitlement programs, providing leadership and policies to preserve and expand safe and affordable housing opportunities and promote strong communities for all Californians. By administering programs that provide grants and loans from both state and federal housing programs, HCD can leverage existing programs to increase the impact of CDBG-DR funding.

To maximize the impact of the CDBG-DR funding provided to the state, there will be an ongoing commitment to identify and leverage other federal and non-federal funding sources. HCD will also utilize existing relationships and strive to create new partnerships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of leveraging all viable sources of funding.

CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources, including FEMA and SBA. Existing state resources and other funds from the disaster appropriation will also be examined to ensure that all available funding is used where it is most needed.

Furthermore, the state has designed all housing programs in this Action Plan to cover the gap in funding remaining after insurance, and other assistance has been applied to each project. Understanding the limited funding for recovery, the state will encourage all program applicants to seek out other funding sources to meet their full recovery needs.

The state has authorized many housing programs that may complement the recovery effort. These programs are either competitive or are issued based on a formula allocation; no loans or grants are made directly to individual households. Cities, counties, qualified CHDOs, affordable housing corporations, and other qualified applicants may apply to build more affordable housing in their community to speed recovery.

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4.5 Distribution of Funds

HCD will distribute funds to beneficiaries using one of two methods: 1) HCD administered programs and 2) local government (known as “subrecipients”) administered projects.

4.5.1 Eligible Geographic Location – 2020 & 2021 HUD MID Areas

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HCD will spend 100 percent of the 2020 and 2021 DR Allocations, including the mitigation set-aside, in the HUD MID areas.

The following counties make up the MID areas for DR-4558 and DR-4569: Butte, Fresno, Los Angeles, Napa, Santa Cruz, Shasta, Siskiyou, Solano, and Sonoma. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan. The DR-4610 MID is Plumas County.

4.5.2 Criteria to determine the method of distribution

Funds are distributed among proposed programs using an objective methodology targeted towards the Most Impacted and Distressed identified earlier in this document. Distribution methods are designed to consider the unique context and needs of affected populations as well as the administrative capacity of jurisdictions that will manage the local recovery process. This methodology ensures that CDBG-DR funds will be used to maximum benefit to address unmet housing recovery, infrastructure repair, mitigation goals, and economic revitalization needs.

As required by the Federal Register Notice, HCD conducted an assessment of its internal capacity during program planning and design. The capacity assessment concluded that, with organizational and staffing adjustments at HCD, the Department can successfully launch and directly manage a large statewide program.

HCD also assessed the capacity of local governments to administer CDBG-DR funded programs during recovery planning and coordination discussions. This assessment included evaluations of localities’ familiarity with key grant administration requirements, experience managing programs similar to those proposed in this Action Plan, and ability to add necessary capacity and subject matter expertise through hiring or procurement.

Through the conversations and working sessions with local officials, HCD gained a clear understanding of local strengths and how best to leverage the capacity and expertise at the local level. These assessments concluded that local governments are best positioned to operate and manage project specific funding related to infrastructure.

The level of unmet recovery need identified in both eligible 2020 counties, as well as the MID counties, far exceeds the amount available through the current 2020 funding allocation. With limited funds available, HCD must prioritize its limited funding on areas that will make the most impact for low and moderate income, federally protected classes, and vulnerable populations. In an effort to maximize its impact, HCD proposes to use the 2020 funds to focus on unmet housing need and infrastructure funding that can support housing development.

All 2021 recovery funds will be used in the MID, which only includes Plumas County.

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As discussed in the Unmet Needs section, there are unmet recovery needs across all eligible activities. The needs assessment influenced the development and prioritization of recovery activities outlined in the Action Plan. HCD consulted with affected citizens, stakeholders, local governments, and public housing authorities within the most impacted and distressed areas (HUD MID) to assess needs. The full list of consultations is available in the Appendix (5.c). HCD consulted with the Continuum of Care agencies impacted by the 2020 disasters; details of these consultations can be found in the Appendix. With limited CDBG-DR resources available, HCD is committed to utilizing the state resources available to them to meet the needs of unhoused populations in the impacted area. HCD conducted data analysis on federally protected classes within the 2020 disaster impacted area and consulted with service providers and local governments that work with vulnerable populations. The proposed CDBG-DR programs encourage applicants to prioritize vulnerable populations through tiering (OOR program) and through project selection (multifamily program). In addition, HCD proposes to leverage other state funding available to support the needs of vulnerable populations in the impacted area. Following the guidance in the federal register notice, along with California’s existing affordable housing crisis, the state will focus its 2020 CDBG-DR resources primarily on housing programs in MID areas, with the remaining funding for FEMA PA match for housing-related infrastructure projects in MID areas.

Multifamily Housing Program (MHP)

For the Multifamily Housing Program, allocations are based on FEMA IA applicant data for LMI renter-occupied households that were categorized as having Major or Severe damage according to HUD’s damage calculations. Given the limited amount of funding available to address the unmet recovery needs for the 2020 disasters, HCD proposes to limit funding available for all CDBG-DR and mitigation programs to only HUD MID counties.

HCD is aware that disasters disproportionately affect LMI households, and that this disparate impact, combined with pre-disaster vulnerabilities, make the recovery process especially challenging for vulnerable populations and underserved communities. LMI households are also more likely to be displaced during and after a disaster due to limited resources and a diminished stock of affordable, available, and safe housing. To mitigate those inequities, HCD applied the following allocation model:

FIGURE 153: 2020 MHP ALLOCATION MODEL

2020 Impacted County	Number of LMI Renters Impacted (FEMA FVL)	Percent of Total Damage	Allocation
Santa Cruz (County)	499	34%	\$43,479,657
Butte (County)	387	26%	\$33,720,696
Napa (County)	142	10%	\$12,372,969
Sonoma (County)	132	9%	\$11,501,633
Los Angeles (County)	119	8%	\$10,368,896

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Solano (County)	89	6%	\$7,754,889
Siskiyou (County)	49	3%	\$4,269,546
Fresno (County)	43	3%	\$3,746,744
Shasta (County)	13	1%	\$1,132,737
Total	1,473	100%	\$128,347,766

Infrastructure Funding Allocation

The overall allocation to the infrastructure recovery program is based on the unmet needs analysis for the local match for FEMA PA projects for categories C-G. Allocations for the CDBG-DR programs are based on needs as identified through an analysis of FEMA IA and FEMA PA claims.

Protected Classes

In addition, HCD also considered the impacts to protected classes as part of the program design and method of distribution. For each program, an analysis of the data and potential impacts was conducted and incorporated into the design. HCD has described the potential impacts and barriers that each protected class may encounter as a result of the program proposed, and mitigating steps taken through program design and implementation. Furthermore, HCD understands the ever-changing world of disaster recovery and mitigation programs and is committed to revisiting and analyzing these impacts throughout the life of each program.

Race/Ethnicity

ORR & Single Family Reconstruction

Historic redlining and discriminatory lending practices have historically disadvantaged Black, Indigenous, and People of Color (BIPOC) across the United States and the State of California. Property values in redlined and vulnerable communities result in lower housing values that may impact the benefit limitations, award caps, and thresholds of a housing recovery program. While barriers to homeownership remain and access to capital for home repair remains unequal, HCD’s ORR prioritizes vulnerable populations and includes hands on case management to ensure that outreach is conducted to the most vulnerable populations recovering from the disaster. This similarly applies to the 2021 Single Family Reconstruction Program.

MHP

California faces a historic housing crisis, particularly with developing affordable rental housing stock. BIPOC disproportionately experience cost burden as renters within the State of California. Many areas across the state face barriers to the development of multifamily rental housing and housing for low-income renters of color. HCD is committed to creating rental stock in disaster impacted areas that primarily serve low- and moderate-income households, and the program guidelines for the MHP consider the potential project’s siting and application process through the program design, project evaluation, and requirement for an Affirmative Fair Housing

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Marketing Plan (AFHMP) for all MHP projects that complies with federal fair housing requirements.

Infrastructure

Similar to housing, vulnerable communities, including communities of color, disproportionately feel the effects of historic disinvestment in community infrastructure. Rural communities across California continue to experience a lack of funding for new infrastructure projects and a lack of funding for maintenance for health and safety related infrastructure including water and sewer. In addition, Colonias throughout California face a lack of infrastructure that greatly impacts Hispanic populations in the state. Through data collected on the area benefit of proposed Infrastructure projects, all HCD's CDBG-DR infrastructure projects consider the impacts to the proposed communities following all federal fair housing requirements. Due to limited funding from the 2020 CDBG-DR program, HCD is prioritizing FEMA PA projects to assist with building communities back and creating a more equitable and holistic recovery for the 2020 impacted areas.

Mitigation

Communities of color and vulnerable populations disproportionately face risks related to climate change. Many stakeholders in HCD's 2020 Analysis of Impediments to Fair Housing also expressed concern about unintended consequences of resilience and mitigation investments at a large scale that could potentially lead to gentrification and displacement of communities of color. HCD's proposed 2020 Mitigation programs will provide resources to low- and moderate-income homeowners to make their homes more resilient to future disasters and add an additional layer of protection to multifamily housing developments to ensure that residents have additional protections from future disasters.

Households with Children

OOOR & Single Family Reconstruction

The housing crisis impacting the State of California limits the number of housing types available for residents, including families with children. The lack of appropriately sized homeownership opportunities may lead to overcrowding or unsafe conditions. From 2015 to 2019, the greatest number of fair housing complaints, as reported by DFEH and FHEO, were attributed to discrimination based upon disability, followed by discrimination based upon race, and then by discrimination based upon familial status. HCD's OOR program is open and available for all household sizes.

MHP

As with homeownership, households with children face a limited supply of affordable housing opportunities across the state of California. Disaster exacerbates this availability of different unit sizes and affordability, pushing impacted households, including families with children further from the disaster impacted areas. The MHP program allows for a variety of unit sizes, and projects are screened for their tie-back to the disaster, ensuring that rental housing is sited appropriately for renters. The MHP program also requires an AFHMP that ensures equal access to CDBG-DR funded properties.

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Infrastructure

All infrastructure projects funded through CDBG-DR must meet all state and local safety standards. HCD's proposed infrastructure program will ensure that disaster areas have the infrastructure they need to re-open safely for all residents, including families with children.

Mitigation

California is in a historic drought and more and more severe wildfires continue to impact residents across the state. HCD's proposed CDBG-MIT programs will offer additional protection from hazards for both owner-occupied and multifamily structures, including households with children.

Persons with Disabilities

OOOR & Single Family Reconstruction

Persons with disabilities were disproportionately impacted by recent disasters in California. The speed of the disasters and challenge of evacuating rural areas has led to a higher proportion of fatalities of persons with disabilities from fire events. In addition to higher risks due to disaster, from 2015 to 2019, the highest number of fair housing complaints reported to DFEH and FHEO in California were related to discrimination based on a disability. HCD includes the following in its OOOR policies and procedures to ensure equal access for persons with disabilities:

"In accordance with Section 504 of the Rehabilitation Act of 1973 requirements, necessary accommodations are made to ensure that eligible elderly persons and persons with special needs can successfully participate in the Program. special accommodation by presentation of a mobility card, or presentation of proof of SSDI benefits."

"Additional modifications to increase accessibility for applicants or household members of applicants who have access and functional needs is an allowable part of the repair, reconstruction, or relocation assistance provided by the Program. "

MHP

HCD's MHP policies and procedures incorporate HUD requirements that at least 5 percent of the units shall be accessible to persons with mobility impairments and at least 2 percent of the units shall be accessible to persons with sensory impairments. Additionally, HCD's Universal Scoring Criteria awards points to applications that include units serving special needs populations, including persons with disabilities. Persons with disabilities are among the groups considered as being most vulnerable and at risk of suffering negative effects from natural disasters.

Infrastructure

All infrastructure projects are required to meet state and local standards for accessibility where needed. Additionally, the state will review the projects with CalOES and ensure that accessibility is incorporated in projects that will ensure accessibility for persons with disabilities.

Mitigation

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Community level mitigation efforts including outreach and engagement campaigns, evacuation planning, and creating safe evacuation routes can all assist a community to ensure its most vulnerable are able to be safely evacuated during a disaster. Due to funding, HCD is unable to include funding for these programs using CDBG-DR, but funding is available from other sources including FEMA's HMGP program, CAL FIRE, and other state resources. However, HCD is proposing to create property level mitigation for single family and multifamily properties, which will allow funding for persons with disabilities to mitigate their homes or to reside in multifamily properties with critical mitigation features built into the properties to mitigate risks from future fires.

Persons over the age of 65

OOR & Single Family Reconstruction

Many of the rural communities impacted by recent wildfires, including the 2020 disaster, have a higher proportion of residents over the age of 65 compared to the state overall. Many residents over the age of 65 are on fixed incomes, or face barriers to rebuilding after a disaster. Due to the fast spread of wildfires, many of the fatalities from recent fires have included persons over the age of 65. Butte and Santa Cruz County had the highest number of homeowners over the age of 65 impacted by the 2020 disaster. The OOR case management team is available to assist all applicants, including those over the age of 65 through the application process. The OOR case management team adapts to the needs of the population to ensure they have access to the program. This includes meeting in person with applicants, providing paper applications, and assisting applications throughout the rebuilding process.

Since over 27 percent of the DR-4610 MID is over age 65, the Single Family Reconstruction Program must target this population during outreach through the support of local government, community organizations, and social services.

MHP

HCD's multifamily Universal Scoring Criteria awards points to applications that include units serving Older Adults in Need of Supportive Services, which includes individuals who are age 55 or older and who need supportive services to maintain and stabilize their housing.

Infrastructure

All infrastructure projects funded through CDBG-DR must meet all state and local safety standards. HCD's proposed infrastructure program will ensure that disaster areas have the infrastructure they need to re-open safely for all residents, including those over 65.

Mitigation

Community level mitigation efforts including outreach and engagement campaigns, evacuation planning, and creating safe evacuation routes can all assist a community to ensure its most vulnerable, including persons over the age of 65, are able to be safely evacuated during a disaster. Due to funding, HCD is unable to include funding for these programs using CDBG-DR, but funding is available from other sources including FEMA's HMGP program, CAL FIRE, and other state resources. However, HCD is proposing to create property level mitigation for single family and multifamily properties, which will include protection for persons over the age of 65.

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Population with Limited English Proficiency

OOOR & Single Family Reconstruction

Homeowners whose primary language is not English are provided vital program documents (e.g., brochures and any relevant forms, applications, surveys, etc.) as well as other tools for guidance translated to their native language. By translating and providing program documents into their native language, all homeowners are given reasonable opportunity to understand program requirements. As a standard practice, program documentation is translated into Spanish. Translation into other languages is completed upon request. The case management team has members on staff who are able to directly manage households where English is not the primary language.

MHP

All developers are required to submit an AFHMP as part of their application and a program threshold. The AFHMP must include how the developer will complete outreach and marketing to ensure those with limited English proficiency have access to the affordable housing units. Each AFHMP is reviewed by HCD as part of the program application and NOFA process.

Infrastructure

The Infrastructure program provides holistic recovery projects to the impacted communities. Given that these projects are the match portion of the FEMA funding, HCD works with its partners at Cal OES and the local governments to ensure that all notifications, job opportunities and workplace documents are translated as needed to ensure access to people with limited English proficiency who may be employed in the project or impacted by the project.

Mitigation

For housing mitigation projects, HCD will provide the same levels of assistance as described in OOOR and MHP. All critical documents will be translated for both programs and MHP mitigation projects are required to outline the access and marketing for those with limited English proficiency in the AFHMP.

4.5.3 HCD Administered

HCD will directly operate the 2020 Disaster Recovery Owner-Occupied Housing Rehabilitation and Reconstruction and Mitigation Owner-Occupied Housing Rehabilitation and Reconstruction Program (OOOR), 2021 Single Family Reconstruction and Mitigation programs, Homebuyer Assistance Program (HBA), and the Disaster Recovery Multifamily Program and Mitigation Multifamily program. For the OOOR Program, staff will engage impacted homeowners statewide to apply for assistance. HCD will utilize a qualified vendor to perform full scale program management duties to augment HCD capacity and ensure high quality customer service delivery. Program staff will work with the procured vendor to maintain program timeliness, provide oversight, and ensure all levels of the program are compliant.

The Homebuyer Assistance Program will be a standalone program, directly administered and implemented by HCD with the assistance of either a state agency partner, a procured contractor, or under a direct subrecipient agreement between HCD and the nonprofit

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organization and will provide down payment and other housing assistance to low- to moderate-income disaster impacted homeowners, enabling them to relocate outside of high-fire risk areas or the disaster declared areas.

HCD will directly administer the Multifamily Program and will directly solicit applications for affordable housing development projects. Funding will be made available to applicants by HCD through a Notice of Funding Availability (NOFA) process whereby applicants will compete for funds in one of six regional set-asides based on the location of the proposed project. More specific program details can be found in the Program Section of this Action Plan.

4.5.4 Subrecipient Administered

HCD will engage with subrecipients to administer the Infrastructure Recovery Program. The Program will fund the CDBG- DR eligible local match for FEMA PA projects for categories C-G. All projects will be vetted for CDBG-DR compliance and eligibility, ensuring that proposed projects adhere to federal requirements and the requirements set forth in the Action Plan and program policies and procedures. The implementation and management of individual projects will be the responsibility of participating subrecipients, while HCD will provide monitoring and broad oversight of subrecipient administered funds. More specific program details can be found in the Program Section of this Action Plan.

Reimbursement Payments to Subrecipients

HCD operates on a reimbursement basis for all CDBG-DR and MIT projects. All costs must be incurred and paid for by the subrecipient prior to HCD providing a reimbursement from the U.S. Treasury.

Subrecipients are expected to submit payment requests on a monthly basis according to the Standard Agreement and provide evidence that all invoices and costs incurred were paid and the work was inspected. Payments for eligible costs are processed when submitted to HCD as reimbursements for subrecipients for expenses incurred during the project. Mitigation staff then reconcile expenditures with FISCAL and Grants Network, the financial system and systems of record for the state and HCD.

Processes for monitoring expenditures of subrecipients and payment processing are outlined in HCD's Grant Administration Manual (GAM).

Under certain conditions, subrecipients may incur costs prior to the effective date of their grant agreement. The subrecipient may then pay those costs (including reimbursing itself if it used its own funds to pay the costs) after the effective date of the grant agreement. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the federal award and only with written approval of HCD.

If pre-award costs (also known as pre-agreement costs) are incurred for an eligible activity listed in this Action Plan, the payment for eligible costs must comply with the pre-award regulations at 24 CFR 570.200(h) and 570.489(b) and follow the guidance issued by HUD in the Community and Planning Development (CPD) notice 15-07. Full eligibility criteria will be provided in the program policies and procedures and will be made available during the project application phase.

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4.7 Program Income

HCD manages program income through the provisions in the Standard Agreement, which all subrecipients must sign to receive funding from HCD. Subrecipients report program income to HCD through a request for payment and must be expended by the subrecipient prior to additional grant funds being drawn. Program income may only be used for eligible project or administration costs related to the awarded project before additional grant dollars are expended. Subrecipients provide monthly reports to HCD on program income generated and retained. Program income remaining at the end of each quarter is remitted to the state. HCD reports, quarterly, all program income to HUD through the HUD Disaster Recovery Grant Reporting system (DRGR). If at the end of a Standard Agreement there is remaining program income, it is returned to HCD during closeout where the Division of Administration and Management Accounting office tracks the program income until it is obligated in a new Standard Agreement and tracked through the Standard Agreement system of record.

4.8 Resale or Recapture

OOB & Single Family Reconstruction

Under the OOR an applicant may be required to repay all, or a portion of the assistance received from the program. The reasons for grant recapture may include the following reasons:

- Providing false or misleading information to the OOR.
- Withdrawal from OOR prior to completion of the project. Withdrawal from the program must be in writing or email and a new survey and application will be required if the applicant wishes to participate again.
- Construction is not completed due to non-cooperation by owner(s).
- Non-compliance with the approved SOW in a manner that would make the home ineligible (i.e., did not comply with lead paint abatement requirements).
- Failure to report the receipt of additional insurance, SBA, FEMA, non-profit assistance and/or any other DOB received after award.

To address any potential future DOB, applicant beneficiaries must, as a requirement for participating in OOR, agree to enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, after an award is issued, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

MHP

New construction, rehabilitation, or reconstruction of rental projects with more than five units shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55 years.

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MHP policies and procedures provide that a developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements of 55 years for the entire period specified in the agreement.

5. Program Details

5.1 2020 Homebuyer Assistance Program

FIGURE 154: 2020 HOMEBUYER ASSISTANCE PROGRAM

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
B-21-DZ-06-0001	\$9,167,698.00	\$9,167,698.00	\$9,167,698.00

Program Description

Given the significant cost to rebuild in high fire hazard zones, exacerbating impacts of the pandemic, and disaster impacts that may have required homeowners and renters to temporarily relocate to other areas of the state for work or other needs, solutions based on equity that provide choices and resources for impacted households to recover are even more critical. Furthermore, many households may not be able to afford long term homeownership in their current location due to high costs associated with rebuilding, maintenance, and insurance.

In partnership with the OOR program intake process, HCD will provide a Homebuyer Assistance Program (HBA) as an additional programmatic option to its housing recovery portfolio to meet the needs of those impacted by the 2020 disasters. HBA will be a standalone program run by HCD with the assistance of either a state agency partner or a procured contractor and will provide down payment and other housing assistance to low- to moderate-income disaster impacted survivors, enabling them to relocate outside of high-risk areas or the disaster declared areas.

Program Tieback to Disaster/Unmet Needs

As the State of California recovers from the devastating fires in 2020, the state is including HBA as a part of its housing portfolio of programs to meet the needs of impacted homeowners and renters. The HBA program extends the portfolio to include an option for homeowners or renters who are looking to relocate outside of the fire impacted area. Providing a program such as HBA provides an alternative option to meet the housing recovery needs of impacted households.

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How Program will Promote Housing for Vulnerable Populations

HCD has consulted with housing counseling agencies in the development of this Action Plan and will continue to work with these agencies as the housing recovery programs are implemented. HCD will follow policies and procedures for compliance with Affirmatively Furthering Fair Housing (AFFH) requirements during the planning and implementation of each housing activity to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing across the disaster-affected areas. Programs will also be developed with the intent to minimize displacement of persons or entities following 24 CFR part 42.325, 49 CFR part 24 of the URA, 104(d) of the HCDA, and regulations under 24 CFR part 570.496(a).

All projects under the housing programs will follow HCD's affirmative marketing procedures for outreach to protected class groups least likely to apply. Additionally, materials will be provided in other languages, such as Spanish, to accommodate LEP persons. Language access services for persons who are LEP and the availability of accessible features and reasonable accommodations for persons with disabilities will be provided through case management.

Program Affordability Period

Program Affordability Period is a minimum of two years.

Program Definition of Second Home/Eligibility

The purchase of a second home is not eligible under this program.

Program National Objective(s):

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR funded activities must satisfy a national objective. All HBA activities will meet the LMI housing national objective criteria related to disaster recovery.

Program Eligibility

- CDBG-DR Eligible Activity - HCDA Section 105(a)(24) Homeownership Assistance
- LMI households whose primary residence was in a HUD MID and was impacted by the 2020 disasters.

Eligible Program Costs

- Down payment assistance (up to 20 percent of the purchase price)
- Housing adjustment incentive
- Rate buydown to lowest possible rate
- All reasonable closing costs (legal, closing fee, title search, conveyance documents, notary fees, surveys, recording fees, lender fees, appraisal, inspection), except for taxes and insurance. These are usual and customary homeowner expenses.

Ineligible Program Costs

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- Moving expenses, including storage expenses
- Temporary relocation housing
- Costs associated with the sale of the disaster impacted property

Form of Assistance

- Funding for HBA is provided in a forgivable loan. Term of forgiveness is a minimum of two years.

Program Responsible Entity

The Homebuyer Assistance Program will be a standalone program directly administered and implemented by HCD with the assistance of either a state agency partner or a procured contractor and will provide down payment and other housing assistance to low- to moderate-income disaster impacted homeowners, enabling them to relocate outside of high-risk areas or the disaster declared areas. HCD will directly administer the Multifamily Program and will directly solicit applications for affordable housing development projects. Funding will be made available to applicants by HCD through a Notice of Funding Availability (NOFA) process whereby applicants will compete for funds in one of six regional set-asides based on the location of the proposed project.

Program Maximum Assistance

- Applicants are eligible to receive up to a maximum award of \$350,000.
- HBA policies and procedures state that in some cases the program will offer an additional award to enhance the affordability or housing suitability of the proposed acquisition. All exceptions to program requirements are considered on a case-by-case basis and may include considerations to accommodate for accessibility.

Program Estimated Begin and End Dates:

The HBA Program is expected to commence following HUD's approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

Other Program Details:

Housing counseling assistance will provide program applicants with wrap around housing and financial educational services including financial literacy education, homebuyer counseling, credit repair counseling, and counseling to mitigate default/foreclosure proceedings. HCD will work with HUD-approved housing counseling agencies which are uniquely situated to assist with the delivery of these services as part of the long-term recovery efforts provided through CDBG-DR funding.

HCD understands the individualized nature of disaster recovery, and the complexities of the recovery process, as well as the necessity to join in that process to provide support and guidance through that process. As such, a housing counseling program for disaster impacted individuals is included as part of the OOR and HBA Programs. Applicants are connected with

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Housing Counseling Agencies for a process that includes up to two optional counseling opportunities and one required counseling opportunity to support their housing recovery process.

Program Competitive Application Overview:

Not applicable.

Program Method of Distribution Description/Overview:

In partnership with the OOR program intake process, HCD will provide a Homebuyer Assistance Program (HBA) as an additional programmatic option to its housing recovery portfolio to meet the needs of those impacted by the 2020 disasters. HBA will be a standalone program run by HCD with the assistance of either a state agency partner or a procured contractor and will provide down payment and other housing assistance to low- to moderate-income disaster impacted survivors, enabling them to relocate outside of high-risk areas or the disaster declared areas.

5.2 2020 Multifamily Housing Program

FIGURE 155: MULTIFAMILY HOUSING PROGRAM

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
B-21-DZ-06-0001	\$128,347,766.00	\$128,347,766.00	\$128,347,766.00

Program Description

The Multifamily Housing Program (MHP) is designed to meet the unmet rental housing need, including the needs of individuals displaced from rental mobile homes, single family and multifamily rental units, as well as individuals made homeless as a result of the disaster. Multifamily projects include apartment complexes and mixed-use developments. These developments are also intended to help replace rental housing units available to Housing Choice Voucher holders that were lost. The objective of the CDBG-DR funds is to provide necessary gap financing for the development of rental housing units in the HUD MID areas from DR-4558 and DR-4569. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

The program will provide rehabilitation and reconstruction to eligible applicants based on the extent of damage to the multifamily property while also providing hardening to the property, to include the creation of defensible space zones that reduce wildfire risk to the residence. MHP

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funds are also available for new construction of multifamily properties in the HUD MID areas from DR-4558 and DR-4569. Projects will include scope of work to harden the properties to include creation of defensible space zones.

Program policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating project proposals. In addition, the policies and procedures outline requirements relative to a minimum percentage of affordable units, the percentage of affordable versus market rate units, requirements for deep affordability, requirements for permanent supportive housing units, as well as the per unit maximum funding available. Multifamily program applications must include affirmative marketing plans (AFHMP) acceptable to HCD in accordance with HCD's affirmative marketing procedures and requirements for all CDBG-assisted housing with five or more units, including efforts to reach those least likely to apply, and persons with limited English proficiency. The AFHMP is a threshold requirement for all CDBG-DR MHP applications and is reviewed by the HCD Program Representative and discussed during MHP Project Review Board meetings. In certain situations, comments are provided back to the developer requesting revisions to the submitted AFHMP. Those situations generally include: 1.) the AFHMP form is inadequately completed; 2.) the AFHMP fails to identify the populations least likely to apply for the housing; or 3.) the AFHMP fails to identify adequate or appropriate marketing efforts.

HCD has provided additional direction regarding how project applicants (developers), through affirmative marketing plans, shall prioritize fire-impacted households for occupancy of units. Applicants must also demonstrate that proposed projects will affirmatively further fair housing, and are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

Projects should also be designed with the established community in mind to mitigate the displacement of families and must commit to an affordability period of 55 years. If other funds requiring a longer affordability period are committed to the project, the longest affordability period will prevail for the project. Applicants shall follow the state's RARAP to minimize displacement.

Program Tieback to Disaster/Unmet Needs

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HCD will spend 100 percent of the 2020 DR Allocation, to include the mitigation set-aside, in the HUD MID areas.

The following counties make up the MID areas for DR-4558 and DR-4569: Butte, Fresno, Los Angeles, Napa, Santa Cruz, Shasta, Siskiyou, Solano, and Sonoma. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

How Program will Promote Housing for Vulnerable Populations

Affirmative Marketing and Fair Housing

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MHP applications must include affirmative marketing plans according to HCD's affirmative marketing procedures and requirements as required for all CDBG assisted housing with five or more units. The AFHMP is a threshold requirement for all CDBG-DR MHP applications and is reviewed by the HCD Program Representative and discussed during MHP Review Board meetings. In certain situation, comments are provided back to the developer requesting revisions to the submitted AFHMP. Those situations generally include: 1.) the AFHMP form is inadequately completed; 2.) the AFHMP fails to identify the populations least likely to apply for the housing; or 3.) the AFHMP fails to identify adequate or appropriate marketing efforts. The affirmative marketing plans shall evaluate the most recent available American Community Survey data and determine those populations who are least likely to apply for the housing opportunity and to persons with Limited English Proficiency. Affirmative marketing plans shall include specific and meaningful targeted outreach efforts to reach those populations identified as least likely to apply for the housing opportunity. Additionally, marketing of available multifamily units developed or otherwise made available with MHP funds shall include outreach to individuals and families that were impacted by the disasters and Section 8 Housing Choice Voucher Program tenants to the greatest extent possible through similar affirmative marketing efforts that aim to reach fire impacted residents. Examples of renters impacted by the disasters include renters that have lost rental units or have been displaced due to the impacts of DR-4558 and DR-4569.

Applications must demonstrate that the proposed projects will affirmatively further fair housing, and are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

Prioritization Criteria

HCD's multifamily Universal Scoring Criteria awards points to applications that include units serving special needs populations, including one or more of the following groups who need Supportive Services to maintain and stabilize their housing: (1) people with disabilities; (2) At Risk of Homelessness, as defined in 24 CFR Part 578.3; (3) individuals with substance use disorders; (4) frequent users of public health or mental health services, as identified by a public health or mental health agency; (5) individuals who are fleeing domestic violence, sexual assault, and human trafficking; (6) individuals who are experiencing Homelessness and individuals experiencing Chronic Homelessness as defined under the federal Continuum of Care Program at 24 CFR Part 578.3; (7) homeless youth as defined in Government Code Section 12957, subdivision (e)(2); (8) families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; (9) individuals exiting from institutional settings or at risk of placement in an institutional setting; (10) Older Adults in Need of Supportive Services; or (11) other specific groups with unique housing needs as determined by the Department.

Program Affordability Period

New construction, rehabilitation, or reconstruction of rental projects with more than five (5) units shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55 years.

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MHP policies and procedures provide that a developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements for the entire period specified in the agreement.

Program Definition of Second Home/Eligibility

Not applicable to the Multifamily Housing Program.

Program National Objective

In accordance with 24 CFR 570.208, all CDBG-DR funded activities must satisfy a national objective. For the multifamily program, all projects will meet the low to moderate income housing national objective. While proposed projects may be mixed-income, CDBG-DR funds will only be applied to the affordable units restricted for occupancy by low-to-moderate-income households.

Program Eligibility

Eligible Projects

Eligibility of multifamily housing project proposals will be assessed by HCD. Specific eligibility criteria include:

- The proposed project must be located in a Most Impacted and Distressed area, DR4558 or DR-4569.
- The proposed project must have a minimum of five total units.
- A minimum of 51 percent of the units in the proposed project must be affordable units.
- Maximum Rents: HCD is establishing program affordable rents at the annual [Multifamily Tax Subsidy Projects \(MTSP\) Regular Income Rent Limit](#) for each applicable area.
- All sources of funding required to complete the project must be identified and secured or readily accessible.
- The proposed project must be cost reasonable, which is what a reasonable person would pay in the same or similar circumstances for the same or similar item or service. Cost reasonableness may be documented by comparing costs between vendors or by comparing submitted costs to an independent cost estimate.
- The proposed project must not exceed the maximum per-unit subsidy limit.
- The proposed project must meet the following affordable rent requirements and tenant income limits over the duration of the minimum affordability period. At a minimum, the following thresholds must be adhered to in all projects:
 - HCD will determine the number of units in an approved multifamily development that will be leased to tenants with an income of up to 80 percent of the AMI based on regulatory and program requirements.
 - Affordable rents will be the Multifamily Tax Subsidy Projects (MTSP) Regular Income Rent Limit published annually by HCD for the jurisdiction where the project is located.
 - New construction, rehabilitation, or reconstruction of rental projects shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55 years.

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Program Responsible Entity

The MHP is administered and monitored by HCD. HCD will publish program policies and procedures to govern the program and ensure compliance with the established program policies and procedures, regulatory requirements, and broader recovery goals. HCD is responsible for overseeing the program, publishing a NOFA, and reviewing and underwriting applications to develop new construction multifamily project units or substantially rehabilitate multifamily project units. As part of the NOFA process, HCD reviews developer experience to ensure that developers have multifamily housing development experience.

Qualified developers must have completed at least one to two projects that are in service more than three years, and at least one shall be Department- regulated or projects utilizing low-income housing tax credits allocated by TCAC in order to receive any points under the Development and Ownership Experience section of the Universal Scoring Criteria.

Multifamily developments funded under this CDBG-DR grant will adhere to standard requirements set by HCD to ensure compliance, as well as specific requirements set by the governing federal income limits. All requirements of the MHP will be outlined in detail in the program policies and procedures. HCD will provide technical assistance to developers to ensure compliance with CDBG-DR requirements and consistency with the program policies and procedures. In addition, periodic risk-based monitoring of the project construction will be conducted to test compliance and ensure timely project completion.

HCD is solely responsible for making awards to successful applicants, facilitating execution of appropriate agreements, including regulatory agreements, to restrict MHP units within a project for a period of not less than 55 years, and compliance with all requirements of the NOFA and the MHP policies and procedures.

Once HCD selects projects and announces awards, the form of agreement with successful applicant developers will be a Standard Agreement which will define each party's obligations, commit funding to the project, establish timelines and milestones, and reiterate relevant compliance requirements. At an appropriate time specified in the Standard Agreement, a Regulatory Agreement shall be recorded in first position above all other liens or encumbrances.

HCD's role includes determining the capacity and experience of project developers and/or construction contractors, completion of the NEPA environmental review, project oversight, and ensuring compliance with the accessibility requirements of both the Federal Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 during construction and at initial occupancy. HCD will be responsible for monitoring developer or contractor compliance with construction advertisement and notification to minority and women-owned businesses of contracting opportunities available for the federally assisted project. HCD will monitor labor standards compliance and compliance with HUD's Section 3 quantitative and qualitative benchmarks during construction and will ensure long-term compliance with affordability requirements and fair housing laws throughout the affordability period.

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Program Maximum Assistance

Selected proposals are funded in the form of a below-market interest rate residual receipts loan to be disbursed on a reimbursement basis via a Standard Agreement between HCD and the developer to ensure that proper financial controls and safeguards are in place to protect CDBG-DR funds. Specific payment terms and conditions are outlined in the Standard Agreement and associated loan documents. The Standard Agreement defines financial and property management requirements as well as remedies to correct deficient or non-compliant projects. Standard Agreements, Regulatory Agreements, and loan documents will also contain CDBG-DR recapture provisions for non-performance or breach of developer responsibility.

The MHP per-unit maximum assistance is consistent with HOME limits established by HUD. The methodology for calculating those limits is found in 83 CFR 25693⁸⁰ with state-wide limits published annually by HCD. As a state-wide program with a variety of housing markets and corresponding costs, HCD uses the HOME limit as a federally established industry standard and safe harbor for cost reasonableness on a per-unit basis for housing serving low-income households. Consistent with other HUD affordable housing funding sources, the HOME maximum per-unit subsidy limits ensure an appropriate level of investment in multifamily projects on a per-unit basis. This policy direction encourages leveraging with HOME, Tax Credits, state MHP, and other available affordable housing resources.

FIGURE 156: SUBSIDY AMOUNTS

Bedrooms	Maximum Subsidy
0	\$159,754
1	\$183,132
2	\$222,694
3	\$288,094
4	\$316,236

Threshold per unit: If HUD has issued a regional per unit subsidy increase covering the jurisdiction of a project, the alternative subsidy amount may be used, up to 240 percent of the base subsidy limit. HCD will use the MHP Maximum Per-Unit Loan Limits for appropriate loan sizing. Awards of CDBG-DR funds shall not exceed the lesser of the demonstrated need or the MHP Maximum Per-Unit Loan Limit.

⁸⁰ "HOME Maximum Per-Unit Subsidy Limits," HUD Exchange (HUD), accessed April 2, 2022, <https://www.hudexchange.info/resource/2315/home-per-unit-subsidy/>.

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Program Estimated Begin and End Dates

The MHP will begin following HUD's approval of the Action Plan and execution of the grant agreement between HUD and HCD. Project awards by HCD are expected in mid-2024 and construction will continue through the end of the grant term, or until all projects are complete and funds are expended. Individual construction timeframes will be specific to each selected application.

Other Program Details

Eligible Activity

42 USC 5305(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation of privately owned properties, and including the renovation of closed school buildings).

The eligibility of housing projects is further established in the Consolidated Notice, 87 FR 6370, which requires HCD to address unmet housing recovery needs with CDBG-DR funds. New housing construction is also eligible as established in the Consolidated Notice, 87 FR 6371, paragraph B.1 of Section II.

Through the FRN, 87 FR 6370, HUD adopts alternative requirements to activities eligible under HCDA Section 105(a) which allows California to carry out modified activities to comply with the requirements in the FRN to incorporate mitigation measures as a construction standard.

HCD commits to funding activities eligible under Title I of the Housing and Community Development Act of 1974 or those activities specified by waivers in 86 FR 6364. Selected projects will be funded through completion in accordance with their financing needs. HCD will perform a check for duplication of benefit and federal funding supplantation prior to issuing an award to ensure that duplicative assistance is not provided for multifamily housing. DOB and supplantation checks will be maintained in the project file. Complete lists of eligible and ineligible project and subrecipient activity delivery costs will be provided in the program policies and procedures.

Eligible costs include:

- Activity delivery costs for HCD to administer and monitor the MHP program, including allocable direct and indirect staff costs and consultant costs
- Architectural and engineering design
- Permitting fees
- Developer fees
- Mobilization, site prep, and clean up
- Construction costs
- Land and building acquisition costs (on a case-by-case basis)
- Hazard mitigation costs
- Ineligible costs include:
- Pre-application costs and application development costs

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- Advances of any type, including construction
- Facility operating or maintenance expenses
- Offsite improvements

HCD reserves the right to question the applicability and eligibility of costs on a per-application basis. HCD will also ensure that construction costs are reasonable and consistent with current market costs for the area where the multifamily construction will take place.

Incorporation of Mitigation Measures

In response to the FRN, applications must describe how hazard mitigation measures will be incorporated into the project to reduce the impacts of recurring natural disasters and the long-term impacts of climate change. The State of California building code, which incorporates mitigation measures, is applicable to HCD's CDBG-DR projects. All residential construction projects must comply with the current published housing construction codes for the State of California. Housing construction codes for building in California follow federal and state laws, regulations, and adaptations for construction of single family and multifamily units.

Building standards are published as the California Buildings Standards Code under the California Code of Regulations, Title 24, and construction standards must meet or exceed all applicable requirements for housing or building construction.

Construction standards for HCD's housing projects can be referenced online at: <https://www.hcd.ca.gov/building-standards-hcd>.

Specific code compliance to achieve hazard mitigation, such as Wildland-Urban Interface (WUI) area building codes, are implemented where applicable according to local code and the unique needs of impacted communities.

WUI area building codes are designed to mitigate the risks from wildfire to life and property. The standards within a WUI area code vary according to the scope that a community is willing to adopt and enforce. WUI area codes may include the following topics:

Structure density and location: number of structures allowed in areas at risk from wildfire, plus setbacks (distance between structures and distance between other features such as slopes).

Building materials and construction: roof assembly and covering, eaves, vents, gutters, exterior walls, windows, non-combustible building materials, and non-combustible surface.

Vegetation management: tree thinning, spacing, limbing, and trimming; removal of any vegetation growing under tree canopies (typically referred to as "ladder fuels"), surface vegetation removal, and brush clearance; vegetation conversion, fuel modifications, and landscaping.

Emergency vehicle access: driveways, turnarounds, emergency access roads, marking of roads, and property address markers.

Water supply: approved water sources and adequate water supply.

Fire protection: automatic sprinkler system, spark arresters, and propane tank storage.

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Applications must take into account the costs and benefits of incorporating hazard mitigation measures to protect against the specific identified impacts of future extreme weather events and other natural hazards. As noted, applicants may include up to 5 percent of their budget solely for mitigation costs.

Broadband Infrastructure

Projects involving reconstruction, or new construction of a building with more than four rental units must include installation of broadband infrastructure. More specific information for this requirement will be included in MHP program policy and procedures.

Program Competitive Application Overview

Program Competitive Application Universal Scoring Criteria

Applications that pass the initial threshold review will be scored using the Universal Scoring Criteria. In the event of tied point scores, HCD shall rank tied applications based on three factors pursuant to the tie-breaker system detailed in the Universal Scoring Criteria: the lowest weighted average affordability of all residential Units, leverage of other funds, and cost containment.

Incomplete applications or others not expected to receive an award of funds due to relatively low scores may not be fully evaluated.

A. Summary

The criteria detailed below and summarized in the following table shall be used to rate applications:

Universal Point Score Criteria (Used in Project ranking separate from Threshold Review)		
Criterion		Maximum Score
Universal Scoring Criteria	Extent to Which the Project Serves Households at the Lowest Income Levels	30
	State Policy Priorities	20
	Project Sponsor and Property Management Experience	20
	Project Readiness	27
	Infill / Proximity to Amenities / Sustainable Building Methods	15
	Cost Containment	5

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Total Possible Universal Points	117
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B. Extent to which the Project serves households at the lowest income levels

(30 points maximum)

Applications will be scored based on the percentage of Restricted Units limited to various percentages of AMI, adjusted by household size, and as follows:

1. A maximum of 30 points will be awarded based on the Lowest Income Points Table below.
2. Each “Percent of AMI” category may be used only once. For instance, 50 percent of Restricted Units at 50 percent of AMI cannot be used twice for 100 percent of Units at 50 percent AMI and receive 25 points, nor can 50 percent of Restricted Units at 50 percent of AMI for 12.5 points and 40 percent of Restricted Units at 50 percent of AMI be used for an additional 10 points. However, the “Percent of Restricted Units” may be used multiple times. For example, 50 percent of Restricted Units at 50 percent of AMI for 12.5 points may be combined with another 50 percent of Restricted Units at 45 percent of AMI to achieve the maximum points.

Lowest Income Points Table											
Percent of AMI											
Percent of Restricted Units		65%	60%	55%	50%	45%	40%	35%	30%	25%	20% & below
	50%	5	7.5	10	12.5	16.9	17.5	18.75	30	30	30
	45%	5	6.75	9	11.25	16.9	17.5	18.75	30	30	30
	40%	5	6	8	10	15	17.5	18.75	27.5	30	30
	35%	4.4	5.25	7	8.75	13.15	17.5	18.75	25	27.5	30
	30%	3.75	4.5	6	7.5	11.25	15	18.75	22.5	25	30
	25%	3.15	3.75	5	6.25	9.4	12.5	15.65	18.75	21.9	25
	20%	2.5	3	4	5	7.5	10	12.5	15	17.5	20
	15%	1.9	2.25	3	3.75	5.65	7.5	9.4	11.25	13.1	15
	10%	1.25	1.5	2	2.5	3.75	5	6.25	7.5	8.75	10

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To receive any points in this category, at least 10 percent of the Restricted Units must be restricted to households with incomes not exceeding 30 percent of AMI.

The percentage of restricted units must be rounded to the nearest whole percentage point (i.e. 29.7% rounds to 30.0%).

Example:

10% of units at 30% AMI	7.5
15% of units at 40% AMI	7.5
50% of units at 50% AMI	12.5
25% of units at 65% AMI	3.15
Total Points scored	30.35 (Max 30)

Deeply Affordable Units - those Units with up to 30 percent AMI targeting - cannot be concentrated among a Project's smaller Units. They must be distributed proportionately across all Unit sizes, or, alternately, more heavily represented among larger Units. To ensure a proportional spread of deeply Affordable Units, at least 10 percent of the larger Units in the Project must be provided at 30 percent of AMI, as applicable. So long as the Applicant meets the 10 percent standard Project-wide, the 10 percent standard need not be met among all the smaller Units.

Example:

60 Total Units in Project	Required ELI Units (30% AMI)
18 three-bedroom	2 Units
21 two-bedroom	2 Units
21 one-bedroom	2 Unit
Total (10%)	6 Units

C. State Policy Priorities

(20 points maximum)

- a. (5 points maximum) Five points will be awarded for Projects located in a "High Resource" or "Highest Resource" Area as shown on the TCAC/HCD Opportunity Area Map

Once Projects receiving 5 points pursuant to paragraph (1) have been ranked according to the scoring criteria and as further described in the NOFA and

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recommended for award in the amount of 50 percent of all Program funds available in a geographic set-aside region as outlined in Figure 105: Method of Distribution, remaining Projects shall not receive 5 points for meeting the requirements of this paragraph.

b. Total Percentage of DR-MHP funded Units Serving Special Needs Populations (10 points maximum)

Chronically Homeless, Homeless via Coordinated Entry System (CES) or Other Special Needs	
Total percent of DR-MHP funded Units	Points
25%+	10 points
16-24%	9 points
10-15%	8 points

Special Needs or Special Needs Population(s) means one or more of the following groups who need Supportive Services to maintain and stabilize their housing: (1) people with disabilities; (2) At Risk of Homelessness, as defined in 24 CFR Part 578.3; (3) individuals with substance use disorders; (4) frequent users of public health or mental health services, as identified by a public health or mental health agency; (5) individuals who are fleeing domestic violence, sexual assault, and human trafficking; (6) individuals who are experiencing Homelessness and individuals experiencing Chronic Homelessness as defined under the federal Continuum of Care Program at 24 CFR Part 578.3; (7) homeless youth as defined in Government Code Section 12957, subdivision (e)(2); (8) families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; (9) individuals exiting from institutional settings or at risk of placement in an institutional setting; (10) Older Adults in Need of Supportive Services; or (11) other specific groups with unique housing needs as determined by the Department.

Special Needs Populations does not include “seniors or veterans” unless they otherwise qualify as a “Special Needs Population” as required by other statutory laws.

c. Public Excess Lands (5 points maximum)

Five points will be awarded if a new construction Project is located on a site designated as excess land under Executive Order N-06-19 or any land declared surplus by a local agency.

- i. For excess state-owned property, the Project must be located on a site selected under EO-N-06-19 to enter into a ground lease

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with the state to create affordable housing on excess state-owned property.

- ii. For surplus land owned by a local agency, including transit agencies:
 1. Land donations made in fee title must be supported by a transfer agreement and demonstrated written conformance with the Surplus Land Act.
 2. Land donations made as a low-cost, long-term lease must be supported by written conformance with Surplus Land Act, and a Post-Negotiation Notice and Proposed Disposition Summary.

D. Project Sponsor/Applicant and Property Management Experience

(20 points maximum)

“Projects” as used in paragraph (1) and (2) below means Rental Housing Developments of over five Affordable Units that are subject to a recorded Regulatory Agreement, or, in the case of housing on Indian Country, where federal HUD funds have been utilized in affordable rental developments. Points in paragraphs (1) and (2) will be awarded in the highest applicable category and are not cumulative. For points to be awarded in paragraph (2), an enforceable management agreement executed by both parties for the subject application must be submitted at the time of application.

By applying for and receiving points in these categories, Applicants certify that the property shall be owned and managed by entities with equivalent experience scores for the entire Regulatory Agreement period.

- a. Development and Ownership Experience. Applications will be scored based on the number of subsidized rental housing Projects (including tax credit Projects) that the Sponsor/Applicant has completed and operated and whether the Sponsor/Applicant is subject to penalties pursuant to paragraph (3) below.

For completed Projects, a Sponsor/Applicant may include the experience of its controlled affiliated entities or its principals (e.g., employed by, and under the control of the Sponsor/Applicant and responsible for managing development activities), but not the experience of non-management board members. A Sponsor/Applicant may include the experience of a partner (e.g., Joint Venture partners pursuant to Appendix A of the Guidelines) to gain experience points; however, the experienced partner must have a controlling interest in the Project’s ownership and a substantial and continued role in the Project’s ongoing operations, as evidenced in the organizational documents for the owner. Experience among partners shall not be aggregated. Any change in the ownership that reduces the Sponsor’s/Applicant’s role shall require prior written approval by the Department.

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If a Sponsor/Applicant relies upon the experience of its Principal for scoring, documentation of the Principal's experience is required as set forth in the NOFA and application.

To receive points under this paragraph the following conditions must be met:

- i. Submit a certification that the Projects for which points are requested have maintained Fiscal Integrity for the year in which each Rental Housing Development's last financial statement has been prepared, a positive operating cash flow from typical residential income alone and have funded reserves in accordance with the partnership agreement and any applicable loan documents.

To obtain points for Projects previously owned, a certification must be submitted with respect to the last full year of ownership by the Sponsor/Applicant, along with verification of the number of years that the Project was owned by that Sponsor/Applicant. To obtain points for Projects previously owned, the ending date of ownership or participation must be no more than ten years from the application deadline.

Points are available as follows:

1-2 projects in service more than 3 years, at least one shall be Department- regulated or projects utilizing low-income housing tax credits allocated by TCAC	5 points
3-4 projects in service more than 3 years, of which 1 shall be in service more than 5 years and 2 shall be Department- regulated or projects utilizing low-income housing tax credits allocated by TCAC	10 points
5 or more projects in service more than 3 years, of which 1 shall be in service more than 5 years and 2 shall be Department- regulated or projects utilizing low-income housing tax credits allocated by TCAC	15 points
For Special Needs Projects with experience serving Target Population(s) proposed to be served in the application, points are available as described above or as indicated below.	
The Developer shall have three or more years' experience serving the Target Population(s) proposed to be served in the application.	
1 <u>Special Needs</u> project in service more than 3 years	5 points
2-3 Special Needs projects in service more than 3 years, of which 1 shall be in service more than 3 years and 1 shall be Department- regulated or projects utilizing low-income housing tax credits allocated by TCAC	10 points

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4 or more Special Needs Projects in service more than 3 years, of which 1 shall be Department- regulated or a project utilizing low-income housing tax credits allocated by TCAC.	15 points
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Pursuant to the DR-MHP Policies and Procedures to be developed, Applicants with fewer than four active Rental Housing Developments in service more than three years shall contract with a bona-fide management company which itself earns a minimum total of five Property Management Experience points at the time of application.

- ii. To obtain development and ownership experience points, Tribal Entities may contract with a Developer who will not be the Project owner and may receive points commensurate with the Developer’s experience pursuant to (a) above.

For purposes of this subparagraph only, a Developer is defined to include an entity pre-approved by the Department that has developed but not owned the requisite number of projects described in (a) above and that provides the certification described in (a) above for the projects for which experience points are requested. If the projects for which the entity requests experience points do not include two Department-regulated projects in service more than three years, the Tribal Entity shall also contract with a bona-fide management company which itself earns a minimum total of 5 Property Management Experience points at the time of application. For this purpose, only, “develop” shall mean developing the project scope and timeline, securing financing, hiring, or performing the services of a general contractor, and overseeing completion of construction and placement in service as well as asset managing the project for at least three years after construction completion. When seeking the Department’s pre- approval, the entity shall provide fully executed copies of contracts demonstrating the Department’s criteria for “develop” as specified above have been met.

The contract shall be in effect at least until the Project’s stabilized occupancy (90 percent occupancy for single room occupancy (SRO) and Special Needs Projects and 95 percent for all other projects), completion of all permanent loan closings, and achievement of all stabilization milestones of the Project’s ownership agreement. Tribal Entities exercising the option under this

subparagraph (B) to contract with a Developer for these experience points shall also contract for asset management for at least the term of the 15-year federal compliance period with an entity that has provided three years of asset management for at least two Department-regulated Projects.

- b. Property Management Company Experience. To receive points under this paragraph, the property management company must meet the following conditions:

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- i. To obtain points for projects previously managed, the ending date of the property management role must be no more than ten years from the application deadline. In addition, the property management experience with a project shall not pre-date the project’s construction completion date. Points are available as follows:

1 project managed over 3 years	1 point
2-4 projects managed over 3 years, of which 1 shall be Department-regulated or projects utilizing low-income housing tax credits allocated by TCAC	2 points
5-7 projects managed over 3 years, of which 1 shall be Department-regulated or projects utilizing low-income housing tax credits allocated by TCAC	3 points
8-10 projects managed over 3 years, of which 2 shall be Department-regulated or projects utilizing low-income housing tax credits allocated by TCAC	4 points
11 or more projects managed over 3 years, of which 2 shall be Department-regulated or projects utilizing low-income housing tax credits allocated by TCAC	5 points
For Special Needs Projects, points are available as described above or as follows:	
4 or more Special Needs Projects in service more than 3 years, of which 1 shall be Department-regulated or a project utilizing low-income housing tax credits allocated by TCAC.	5 Points

When contracting with an experienced property management company under the terms of paragraphs (1) or (2) above, the Sponsor/Applicant or property co-management entity must obtain training in: project operations, on-site certification training in federal fair housing law, and manager certification in Internal Revenue Code (IRC) Section 42 Low Income Housing Credit Program requirements from a CTCAC-approved, nationally recognized entity. Additionally, the experienced property management agent or an equally experienced substitute, must remain for a period of at least three years from the construction completion date (or, for ownership transfers, three years from the sale or transfer date) to allow for at least one HCD monitoring visit to ensure the Project is in compliance with HCD requirements for inspection and monitoring contained in the Regulatory Agreement. Thereafter, the experienced property manager may transfer responsibilities to the remaining general partner or property management firm following formal written approval from HCD.

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- c. Negative Points – An application will be assessed negative points based on performance penalties assessed pursuant to the Department's [Negative Points Policy](#) (Administrative Notice Number 2022-01) amended November 9, 2022, as may be amended from time to time. If the Applicant is subject to a negative points assessment based on the criteria outlined in the Department's Negative Points Policy or is determined to be ineligible for funding, HCD shall notify the Applicant in writing in the initial point score letter.

Negative points will be assessed as a reduction to the score earned under paragraphs (1) and (2) above and will serve as the final score for this criterion. For example, if a Project earns 15 points under paragraph (1) Development and ownership experience and 5 points under paragraph (2) Property Management Company Experience but is assessed 3 negative points, the final score for this criterion would be 17 (15 + 5 - 3).

If the Sponsor/Applicant is subject to negative points assessment, HCD shall notify the Sponsor/Applicant in writing within the point score letter and will provide opportunity to appeal negative points assessment pursuant to the appeals process as set forth in the NOFA.

E. Project Readiness

(27 points maximum)

Points will be awarded to Projects under each of the following rating factors as documented in the application and as indicated below. If a particular rating factor is not applicable, full points shall be awarded in that category.

- a. Financing Commitments (10 points maximum)
- i. Five points will be awarded for evidencing Enforceable Funding Commitments for all construction financing, excluding:
1. funds applied for under the DR-MHP NOFA;
 2. an allocation of tax-exempt bonds; and
 3. 4 percent or 9 percent tax credits.

For Projects with bond financing, lender commitment of bond financing is required for these points.

- ii. Five points will be awarded for evidence of Enforceable Funding Commitments for all permanent financing, grants, project-based rental assistance, and operating subsidies, excluding: funds applied for under the DR-MHP NOFA, an allocation of tax-exempt bonds, and 4 percent or 9 percent tax credits. For Projects with bond financing, any applicable permanent lender commitment of bond financing is required for these points.

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For both construction financing commitments and permanent financing commitments, the assistance will be deemed to be an Enforceable Funding Commitment as this term is defined in the Program Policies and Procedures, if it has been awarded to the Project or if the Department approves other evidence that the assistance will be reliably available. Contingencies in commitment documents based upon the receipt of an allocation of tax- exempt bonds, 4 percent tax credits or 9 percent tax credits will not disqualify a source from being counted as committed.

To receive points under paragraphs (a) and (b) above for deferred payment financing, grant funds, or subsidies from other Department programs, these funds must be awarded prior to finalizing the preliminary point scoring of applications under the DR- MHP NOFA.

b. Local and Environmental Approvals (15 points maximum)

i. Land use approvals (10 points maximum) – Points will be awarded under item i, ii, or iii below.

1. Ten points will be awarded for obtaining all land use approvals or entitlements necessary prior to issuance of a building permit, including any required discretionary approvals. Notwithstanding this requirement, design review, variances, and development agreements are not required to be completed. Project sites where the planning department confirms eligibility for streamlined ministerial approval (including but not limited to the Senate Bill 35 (2017) Streamlined Ministerial Approval Processing) are eligible for these points.
2. Five points will be awarded for submission of a complete application to the relevant local authorities for land use approval under a Nondiscretionary Local Approval Process, where the application has been neither approved nor disapproved.
3. One point will be awarded for a letter signed by a planner certified by the American Institute of Certified Planners indicating that, in their opinion, the Project meets all of the requirements for approval under a Nondiscretionary Local Approval Process, where an application has not been approved or disapproved by the local authorities.

ii. Environmental Approvals (5 points maximum) – Points will be awarded for submission of a local certification of California Environmental Quality Act (CEQA) exemption or completion and submission of:

1. A Complete Draft Environmental Assessment with source documentation;

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2. A Complete Draft National Environmental Policy Act (NEPA) Categorically Excluded – Subject to 58.5 review with source documentation; or
3. A signed Authority to Use Grant Funds from HUD or other appropriate federal agency, supported with the underlying environmental review document and source documentation.

Note: The Project’s NEPA Authority to Use Grant funds must be received prior to the construction loan closing. It is not necessary to have the Authority to Use Grant Funds at the application stage.

- c. Organizational Documents (2 points maximum) – Points will be awarded if the ultimate borrowing entity, including all affiliated entities, is fully formed and all required organizational documents are submitted with the application.

F. Infill / Proximity to Amenities / Sustainable Building Methods

(15 points maximum)

Applications will receive 5 points for each of paragraphs 1-3 of the following three conditions, up to a maximum of 15 points as defined below:

- Infill development and Net Density
 - Proximity to amenities
 - Sustainable building methods
- a. Infill development and Net Density. Five points will be awarded for infill development located in a developed area served with public infrastructure. The Project must meet one of the following requirements of (a) or (b) below:
 - i. Located on a site where either:
 1. At least 75 percent of the site was previously improved (including areas where improvements have been demolished) or used for any use other than Open Space, agriculture, forestry, or mining waste storage; or
 2. At least 75 percent of the perimeter of the site’s adjoining parcels that are developed with Urban Uses (residential, commercial, industrial, public institutional, transit or transportation passenger facility use, or retail use, or any combination of those uses) but not including lands used for agricultural uses or parcels in excess of 15,000 square feet in size and containing only one single family residence, or is separated from parcels that are developed with Urban Uses only by an improved public right-of-way. In calculating this percentage, perimeters bordering navigable bodies of water and improved Parks shall not be included; or

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3. The combination of at least 50 percent of the site area as previously improved (including areas where improvements have been demolished) or used for any use other than Open Space, agriculture, forestry, or mining waste storage, and at least 50 percent of the perimeter of the site adjoining parcels that are developed with Urban Uses or is separated from parcels that are developed with Urban Uses only by an improved public right-of-way. In calculating this percentage perimeters bordering navigable bodies of water and improved Parks shall not be included.
- ii. Developed at average residential Net Densities on the parcels to be developed that are greater than the densities described below:
 1. For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 20 Units per acre.
 2. For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 15 Units per acre.
 3. For a suburban jurisdiction: sites allowing at least 25 Units per acre.
 4. For a jurisdiction in a metropolitan county: sites allowing at least 45 Units per acre.
 5. For a Rural Area: sites allowing at least 15 Units per acre.
- b. Proximity to amenities. Maximum of 5 points.

Projects will receive 1/3 point per site amenity point that would be awarded under TCAC Regulations, Title 4 CCR, Division 17, Chapter 1, Section 10325(c)(4)(A) or successor regulation (In TCAC regulations, this is a 15-point category, however, achieving all 15 points under TCAC translates to 5 points under this category).

Transit points must be for a Transit Station or Major Transit Stop and distance must be measured by a Walkable Route.
- c. Sustainable building methods. Points will be awarded based on the following (up to a maximum of 5 points):
 - i. 2.5 points will be awarded if the Project supports the implementation of a sustainable community's strategy or alternative planning strategy that has been determined by the California Air Resources Board to achieve the region's greenhouse gas emissions target or other adopted regional growth plan intended to foster land use. Consistency with such plans must be demonstrated by a letter or resolution executed by an officer or an equivalent representative from the metropolitan planning organization, regional transportation agency, planning, or local transportation commission.
 - ii. If a sustainable community's strategy is not required for a region by law, 2.5 points will be awarded if the Project supports a regional plan that includes

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policies and programs to reduce greenhouse gas emissions. Evidence of consistency with such plans must be demonstrated by a letter or resolution executed by an officer of, or an equivalent representative from, the metropolitan planning organization or regional transportation planning agency or local transportation commission.

- iii. A Project in which not less than 50 percent of the land area is within a Transit Priority Area shall receive 2.5 points. Evidence of Project location within, or partially within, a Transit Priority Area must be demonstrated by a letter or resolution executed by an officer of, or an equivalent representative from, the metropolitan planning organization, regional transportation planning agency, or local transportation commission.
- iv. Five points will be awarded for a Project that is designed to achieve green building status beyond state mandatory building code requirements as verified upon construction completion by a certified LEED Green rater, certified Green Point rater, or licensed engineer. Applicants may select from the following green building certification programs:

Program	Minimum Required Tier or Designation
CALGreen	Tier 2
U.S. Green Building Council LEED Certification	Gold
Green Point Rated	New Construction: Gold Rehabilitation: Whole Building
ENERGY STAR	Certified Home
Living Future Challenge	Living Building

- v. Three points for Projects that achieve near electrification – Projects where two out of three of the major energy appliances (cook stoves, space heating, water heating) are electric. Projects must be wired to be electric-ready, defined as having 240 volts outlets near each gas appliance.

Five points will be awarded for Projects that are powered entirely through electricity with no connections to natural gas infrastructure.

G. Cost Containment

(5 points maximum)

A project shall receive 1 point for each full percent that the Project's eligible basis is less than the Project's adjusted threshold basis limit, up to a maximum of 5 points.

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The percentage is calculated by dividing the Project's eligible basis by the Project's adjusted threshold basis limit.

Total Eligible Basis per the Development Budget

Adjusted Threshold Basis Limit

(Per California Debt Limit Allocation Committee (CDLAC)
Regulation Section 5230)

For purposes of this subdivision, a Project's adjusted threshold basis limit shall be the Project's threshold basis limit, as if it were a 4 percent LIHTC project, as determined pursuant to Section 10327(c)(5) of the TCAC regulations, except that the increase for deeper targeting pursuant to Section 10327(c)(5)(C) of the TCAC regulations that is multiplied by the unadjusted threshold basis limit shall be limited to 80 percent. Section 10327(c)(5) of the TCAC regulations states that for Projects financed through CDLAC, "an increase of one percent in the threshold basis limits shall be available for every 1 percent of the project's Low-Income and Market Rate Units that will be income and rent restricted at or below 50 percent but above 35 percent of AMI. An increase of 2 percent shall be available for every 1 percent of the project's Low-Income and Market Rate Units that will be restricted at or below 35 percent of AMI. In addition, the applicant must agree to maintain the affordability period of the project for 55 years (50 years for projects located on Tribal Trust Land)." The Department, however, will only restrict to income levels in 5 percent increments.

Any Project may be subject to performance penalties if the Project's total eligible basis determined upon construction completion exceeds the revised total adjusted threshold basis limits for the year the Project completes construction (or the original total eligible threshold basis limit if higher) by 40 percent.

H. Tiebreaker Score

(5 points maximum)

In the event of tied point scores, the Department shall rank tied applications based on three factors which will be implemented in sequence. The three factors are: (1) the lowest weighted average affordability of all residential Units, (2) leverage of other funds, and (3) additional cost containment. If after review of the first factor the application(s) remain tied, the second factor shall be calculated. If after review of the second factor, the application(s) remain tied, the third factor shall be calculated. The tiebreaker scoring calculation is explained below.

1. Lowest weighted average affordability of all residential Units.

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- a. Multiply each income limit applicable to the Project by the number of adjusted residential Units restricted at that income level (market rate Units, which do not include Units subject to Rent and/or occupancy restrictions at 70 percent or 80 percent AMI, shall be designated 100 percent AMI). Unrestricted Manager’s Unit(s) are excluded from this calculation.

To calculate adjusted residential Units, multiply the residential Units of a Unit Type (bedroom count) by the following adjustment factors:

Unit Type	Adjustment Factor
Studio/SRO	0.90
1-Bedroom	1.00
2-Bedroom	1.25
3-Bedroom	1.50
4-Bedroom or larger	1.75

For purposes of this calculation:

- Units with federal project-based rental assistance shall be assigned targeted Rent levels of 30 percent AMI regardless of their actual income targeting; and
 - If the average affordability of all unadjusted residential Units, exclusive of Units with rental assistance, is less than 40 percent AMI, then the calculation shall assume a targeted Rent level of 40 percent AMI for each residential Unit that does not have rental assistance.
- b. Add the products calculated pursuant to the previous paragraph.
 - c. Divide the sum calculated pursuant to the previous paragraph by the total number of adjusted residential Units in the Project to obtain the average affordability.
 - d. Subtract (c) from 1.0.
2. Leverage of other funds.
- a. Applications will be scored based on the leverage of other soft funds, meaning local public funds, including land donations or fee waivers to be used for permanent funding of the development costs attributable to the Restricted Units as a percentage of the total Project development cost.

Local public land donations will be counted as leveraged funds where the value is established with a current appraisal, with the amount discounted to reflect a

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purchase price that is lower than the appraised value, or any fees, or other reliably predictable payments required as a condition of the donation.

- b. The capitalized value of Rent differentials attributable to public project-based rental or public operating subsidies, based upon TCAC underwriting standards. Standards shall include the following and shall be annually aligned with TCAC standards for these capitalized values to the extent possible: a 15-year loan term; an interest rate based upon a spread over 10-year Treasury Bill rates; a 1.15 to 1 debt service coverage ratio; and a 5 percent vacancy rate.

The rental income differential for subsidized Units shall be established by subtracting rental income at 40 percent AMI levels (30 percent AMI for Special Needs Units with project-based rental assistance) from the committed contract Rent income documented by the subsidy source. In the case of a USDA rental subsidy only, the contract Rent income is the higher of 60 percent AMI rents or the committed contract USDA Basic rents. The committed contract Rent income for Units with existing project-based Section 8 rental subsidy shall be documented by the current monthly contract Rent in place at the time of the application or by contract Rent committed to and approved by the subsidy source (HUD); Rent from a Rent comparable study or post-Rehabilitation Rent shall not be permitted.

The Rent differential for Projects with public operating subsidies shall equal the annual subsidy amount in year one, provided the subsidy will be of a similar amount in succeeding years, or the aggregate subsidy amount of the contract divided by the number of years in the contract if the contract does not specify an annual subsidy amount.

- c. Add the sum of all eligible soft funds as set forth in paragraphs (a), (b) and (c).
 - d. Divide (d) by total Project development cost and express as a decimal.
3. Additional Cost Containment. The “additional cost containment” category for the Tiebreaker follows the same methodology as the Cost Containment scoring category above, in Scoring Category G. This factor is calculated by dividing the Project’s eligible basis by the Project’s adjusted threshold basis limit as illustrated below:

Total Eligible Basis per the Development Budget
Adjusted Threshold Basis Limit (Per CDLAC Regulation Section 5230)

For purposes of this subdivision, a Project's adjusted threshold basis limit shall be the Project's threshold basis limit, as if it were a 4 percent LIHTC Project, as determined pursuant to Section 10327(c)(5) of the TCAC regulations, except that the increase for deeper targeting pursuant to Section 10327(c)(5)(C) of the TCAC regulations that is multiplied by the unadjusted threshold basis limit shall be limited

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to 80 percent. Section 10327(c)(5) of the TCAC regulations states that for Projects financed through CDLAC, “an increase of one percent in the threshold basis limits shall be available for every 1% of the Project’s Low-Income and Market Rate Units that will be income and rent restricted at or below 50 percent (50%) but above thirty-five percent (35%) of Area Median Income (AMI). An increase of two percent (2%) shall be available for every 1% of the Project’s Low-Income and Market Rate Units that will be restricted at or below 35% of AMI. In addition, the Applicant must agree to maintain the affordability period of the Project for 55 years (50 years for Projects located on tribal trust land).” The Department, however, will only restrict to income levels in 5 percent increments.

Percentages shall not include any percentage points requested or awarded (up to 5 percent) pursuant to the Cost Containment point category. The maximum percentage shall be 25 percent.

Note: Any Sponsor may be subject to future performance penalties if the Project’s total eligible basis determined upon construction completion exceeds the revised total adjusted threshold basis limits for the year the Project completes construction (or the original total eligible threshold basis limit if higher) by 40 percent.

The calculation in this paragraph (3) is multiplied by 0.75

Program Method of Distribution Description/Overview (if applicable)

FIGURE 157: 2020 MHP METHOD OF DISTRIBUTION

County	Amount	Region Total
Santa Cruz (County)	\$43,479,657	\$43,479,657
Butte (County)	\$33,720,696	\$33,720, 696
Napa (County)	\$12,372,969	\$31,629,490
Solano (County)	\$7,754,889	-
Sonoma (County)	\$11,501,633	-
Los Angeles (County)	\$10,368,896	\$14,115,640
Fresno (County)	\$3,746,744	-
Siskiyou (County)	\$4,269,546	\$5,402,282
Shasta (County)	\$1,132,737	-
Total	\$128,347,766	\$128,347,766

The regional set asides above represent the total set aside for each region, which includes activity delivery costs (ADC). Subsequent to NOFA publication, threshold eligibility reviews, and

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competitive scoring, allocations to projects will be made to the highest scoring projects within each regional set-aside based on their demonstrated funding gaps, up to MHP funding limits of 40 percent of total development cost and cost allocation for MHP units based on the MHP maximum per-unit subsidy. If a region is over-subscribed, the lowest-ranked project will receive a partial award. If a region is under-subscribed, excess funds from that region will be allocated to the highest-rated project(s) among all projects in other regions that would otherwise receive a partial award. If funds remain after fully funding the remaining gap for the highest rated project(s) among all projects in other regions that would have otherwise received a partial award, funds will be allocated to the next highest rated project(s) among all projects in other regions, and such award may partially or fully address a demonstrated funding gap.

Mitigation set-aside activities meet definition of mitigation

Mitigation set-Aside activities address current & future risks

The MHP Mitigation Program will provide for rehabilitation of existing vulnerable multifamily affordable rental developments in MID areas.

Hardening, wildfire retrofitting, of single-family and multifamily units to withstand future disasters meets the definition of mitigation by increasing resilience to future wildfires and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future wildfire events.

The mitigation measures, aligned with the scope of work for rehabilitation or reconstruction, involve initial retrofit or bringing the property up to code with Wildland Urban Interface code standards. The WUI codes identify better construction methods and materials to make buildings more ignition-resistant to wildfire. These standards are based on lab-tested and verifiable performance standards that describe the type a (of?) wildfire exposure a building must be able to withstand.

Given the number of multifamily units in the MID, and the increased need for multifamily housing, HCD recognizes the importance of mitigating existing buildings to ensure residents are in fire-protected buildings. Therefore, in addition to funding mitigation measures within the MHP, HCD may provide a set aside for existing multifamily properties to incorporate mitigation rehabilitation to the properties. HCD would make available mitigation funds in a NOFA for existing multifamily property owners to apply for grants for up to \$300,000 to bring properties up to WUI standards. Further details including funding, eligibility requirements, and scoring criteria will be submitted in a future substantial Action Plan Amendment.

5.3 2020 MHP Mitigation

FIGURE 158: 2020 MHP BUDGET

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
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B-21-DZ-06-0001	\$7,162,287.00	\$7,162,287.00	\$7,162,287.00
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Program Description

The MHP mitigation allows MHP projects to rehabilitate or reconstruct multifamily properties to incorporate mitigation measures. Existing multifamily property owners may apply to a separate NOFA to receive up to \$300,000 in grant assistance from the MHP mitigation set-aside for hardening multifamily units to the WUI code standards. Further details of this program will be forthcoming in a separate action plan amendment.

Program policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating project proposals. In addition, the policies and procedures outline requirements relative to a minimum percentage of affordable units, the percentage of affordable versus market rate units, requirements for deep affordability, requirements for permanent supportive housing units, as well as the per unit maximum funding available. Multifamily program applications must include affirmative marketing plans acceptable to HCD in accordance with HCD’s affirmative marketing procedures and requirements for all CDBG-assisted housing with five or more units, including efforts to reach those least likely to apply, and persons with limited English proficiency. The AFHMP is a threshold requirement for all CDBG-DR MHP applications and is reviewed by the HCD Program Representative and discussed during MHP Project Review Board meetings. In certain situations, comments are provided back to the developer requesting revisions to the submitted AFHMP. Those situations generally include: 1.) the AFHMP form is inadequately completed; 2.) the AFHMP fails to identify the populations least likely to apply for the housing; or 3.) the AFHMP fails to identify adequate or appropriate marketing efforts.

HCD has provided additional direction regarding how project applicants (developers), through affirmative marketing plans (AFHMP), shall prioritize fire-impacted households for occupancy of units. Applicants should also demonstrate that proposed projects will affirmatively further fair housing, and are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

Affordability Requirement

Projects should also be designed with the established community in mind to mitigate the displacement of families and must commit to an affordability period of 55 years. If other funds requiring a longer affordability period are committed to the project, the longest affordability period will prevail for the project. Applicants shall follow the state’s RARAP to minimize displacement.

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Program Tieback to Disaster/Unmet Needs

The proposed project must be located in a DR-4558 or DR-4569 MID area as determined by HUD. The following counties make up these MID areas: Butte, Fresno, Los Angeles, Napa, Santa Cruz, Shasta, Siskiyou, Solano, and Sonoma. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

How Program will Promote Housing for Vulnerable Populations

MHP applications must include affirmative marketing plans according to HCD's affirmative marketing procedures and requirements as required for all CDBG assisted housing with five or more units. The AFHMP is a threshold requirement for all CDBG-DR MHP applications and is reviewed by the HCD Program Representative and discussed during MHP Project Review Board meetings. In certain situations, comments are provided back to the developer requesting revisions to the submitted. Those situations generally include: 1.) the AFHMP form is inadequately completed; 2.) the AFHMP fails to identify the populations least likely to apply for the housing; or 3.) the AFHMP fails to identify adequate or appropriate marketing efforts. The affirmative marketing plans shall evaluate the most recent available American Community Survey data and determine those populations who are least likely to apply for the housing opportunity and to persons with Limited English Proficiency. Affirmative marketing plans shall include specific and meaningful targeted outreach efforts to reach those populations identified as least likely to apply for the housing opportunity. Additionally, marketing of available multifamily units developed or otherwise made available with MHP funds shall include outreach to individuals and families that were impacted by the disasters and Section 8 Housing Choice Voucher Program tenants to the greatest extent possible through similar affirmative marketing efforts that aim to reach fire impacted residents. Examples of renters impacted by the disasters include renters that have lost rental units or have been displaced due to the impacts of DR-4558 and DR-4569.

Applications must also demonstrate that the proposed projects will affirmatively further fair housing, and are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

Program Affordability Period

The MHP mitigation set-aside is integrated into the MHP Program which imposes affordability requirements for new construction, rehabilitation, or reconstruction of rental projects to be deed restricted by a Regulatory Agreement for a minimum affordability period of 55 years.

MHP policies and procedures provide that a developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements for the entire period specified in the agreement.

Program Definition of Second Home/Eligibility

Not applicable to utilization of the MHP mitigation set-aside.

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Program National Objective

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR mitigation set-aside funded activities must satisfy a national objective. All MHP MIT activities will meet the low to moderate income housing national objective.

Program Eligibility

Eligible Activity

The use of the mitigation set-aside must ensure that proposed activities are CDBG eligible under title I of the Housing and Community Development Act, or otherwise eligible pursuant to a waiver of alternative requirements in the FRN:

HCDA Section 105(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvement (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).

The eligibility of housing projects is further established in the Consolidated Notice (FRN), 87 FR 6370, which requires HCD to address unmet housing needs with CDBG-DR funds. New housing construction is also eligible as established in the FRN, 87, FR 6371, paragraph B.1 of Section II.

Through the FRN, 87 FR 6370, HUD adopts alternative requirements to activities eligible under the Housing and Community Development Act (HCDA) Section 105(a) which allows California to carry out modified activities to comply with the requirements in the FRN to incorporate mitigation measures as a construction standard.

Project Eligibility

MHP projects to rehabilitate or reconstruct multifamily properties are required to incorporate mitigation measures. The mitigation set-aside will aid in funding these proposed projects. The same eligibility requirements in place to fund the new construction of multifamily housing apply to the use of the mitigation set-aside for MHP mitigation. Existing multifamily property owners may apply to a separate NOFA to receive up to \$300,000 in grant assistance from the MHP mitigation set-aside for hardening multifamily units to the WUI code standards. Further details of this MHP mitigation activity and NOFA criteria will be forthcoming in a separate substantial action plan amendment.

Program Responsible Entity

The MHP is administered and monitored by HCD. HCD will publish program policies and procedures to govern the program and ensure compliance with the established program policies and procedures, regulatory requirements, and broader recovery goals. HCD is responsible for overseeing the program, publishing a NOFA, and reviewing and underwriting applications to develop new construction multifamily project units or substantially rehabilitate multifamily project

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units. As part of the NOFA process, HCD reviews developer experience to ensure that developers have multifamily housing development experience.

Qualified developers must have completed at least three multifamily developments, at least one of which included affordable rental units. Multifamily developments funded under this CDBG-DR grant will adhere to standard requirements set by HCD to ensure compliance, as well as specific requirements set by the governing federal income limits. All requirements of the MHP will be outlined in detail in the program policies and procedures. HCD will provide technical assistance to developers to ensure compliance with CDBG-DR requirements and consistency with the program policies and procedures. In addition, periodic risk-based monitoring of the project construction will be conducted to test compliance and ensure timely project completion.

HCD is solely responsible for making awards to successful applicants, facilitating execution of appropriate agreements, including regulatory agreements to restrict MHP units within a project for a period of not less than 55 years, and compliance with all requirements of the NOFA and the MHP policies and procedures.

Once HCD selects projects and announces awards, the form of agreement with successful applicant developers will be a Standard Agreement which will define each party's obligations, commit funding to the project, establish timelines and milestones, and reiterate relevant compliance requirements. At an appropriate time specified in the Standard Agreement, a Regulatory Agreement shall be recorded in first position above all other liens or encumbrances.

HCD's role includes determining the capacity and experience of project developers and/or construction contractors, completion of the NEPA environmental review, project oversight, and ensuring compliance with the accessibility requirements of both the Federal Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 during construction and at initial occupancy. HCD will be responsible for monitoring developer or contractor compliance with construction advertisement and notification to minority and women-owned businesses of contracting opportunities available for the federally assisted project. HCD will monitor labor standards compliance and compliance with HUD's Section 3 quantitative and qualitative benchmarks during construction and will ensure long-term compliance with affordability requirements and fair housing laws throughout the affordability period.

Program Maximum Assistance

Existing multifamily property owners may apply to a separate NOFA to receive up to \$300,000 in grant assistance from the MHP mitigation set-aside for hardening multifamily units to the WUI code standards. Further details of this program will be forthcoming in a separate action plan amendment.

Program Estimated Begin and End Dates

The MHP will begin following HUD's approval of the Action Plan and execution of the grant agreement between HUD and HCD.

Project awards by HCD are expected in mid-2024 and construction will continue through the end of the grant term, or until all projects are complete and funds are expended.

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Individual construction timeframes will be specific to each selected application.

Other Program Details

Program Competitive Application Overview

In response to the NOFA, applicants may apply for mitigation funds for existing multifamily properties to harden properties against future wildfire events as described at the end of this section. Further details of this program will be forthcoming in a separate action plan amendment.

The NOFA will include scoring criteria and application forms, application due dates, and submission instructions, and will be published on HCD’s website and other appropriate places as determined by HCD.

FIGURE 159: 2020 MHP REGIONAL SET-ASIDES

County	Amount	Region Total
Santa Cruz (County)	\$43,479,657	\$43,479,657
Butte (County)	\$33,720,696	\$33,720,696
Napa (County)	\$12,372,969	\$31,629,490
Solano (County)	\$7,754,889	-
Sonoma (County)	\$11,501,633	-
Los Angeles (County)	\$10,368,896	\$14,115,640
Fresno (County)	\$3,746,744	-
Siskiyou (County)	\$4,269,546	\$5,402,282
Shasta (County)	\$1,132,737	-
Total	\$128,347,766	\$128,347,766

The regional set asides above represent the total set aside for each region which includes ADC. Subsequent to NOFA publication, threshold eligibility reviews, and competitive scoring, allocations to projects will be made to the highest scoring projects within each regional set-aside based on the lower of the demonstrated need or the MHP Maximum Per-Unit Loan Limit. If a region is over-subscribed, the lowest-ranked project will receive a partial award. If a region is under-subscribed, excess funds from that region will be allocated to the highest-rated project(s) among all projects in other regions that would otherwise receive a partial award. If funds remain after fully funding the remaining gap for the highest rated project(s) among all projects in other regions that would have otherwise received a partial award, funds will be allocated to the next highest rated project(s) among all projects in other regions, and such award may partially or fully address a demonstrated funding gap.

Existing multifamily property owners may apply to a separate NOFA to receive up to \$300,000 in grant assistance from the MHP mitigation set-aside for hardening multifamily units to the WUI

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code standards. Further details of this program will be forthcoming in a separate action plan amendment.

Program Method of Distribution Description/Overview:

HCD will directly administer the Multifamily Program and Mitigation Multifamily program and will directly solicit applications for affordable housing projects. Funding will be made available to applicants by HCD through a Notice of Funding Availability (NOFA) process whereby applicants will compete for funds in one of six regional set-asides based on the location of the proposed project.

Mitigation set-aside activities meet HUD definition of mitigation

The Federal Register Notice requires that 15 percent, \$30,157,000, of the total CDBG-DR unmet needs allocation, \$201,046,000, is set-aside for the state to carry out mitigation activities.

HCD may meet the requirements of the CDBG-DR mitigation set-aside:

- By incorporating mitigation measures into the recovery activities included in this Action Plan and documenting how those activities and the incorporated mitigation measures will meet the definition of mitigation, or
- By including eligible activities that do not have a tie-back to DR-4558 or DR-4569 but still incorporate mitigation measures, meeting the mitigation definition, into the recovery activities.

HCD is allocating 100 percent of the mitigation set-aside program funding to incorporate property hardening activities within the OOR and MHP.

FIGURE 160: 2020 MITIGATION SET-ASIDE PROGRAM FUNDING

OOR Mitigation	\$ 21,486,863
MHP Mitigation	\$ 7,162,287
Total Mitigation Set-Aside Program Funding	\$28,649,150

The criteria to meet the FRN requirements for HCD to utilize the mitigation set-aside are described in this section while all program and eligibility requirements for the OOR and MHP Mitigation Program are explained in the respective OOR and MHP program sections above in IV.G. Housing Recovery Programs.

Mitigation activities are those that increase resilience to future disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship. Proactively addressing the impacts of climate change and natural disasters is critical to building long-term community resilience. The Mitigation set-aside enables single family and multifamily, providing affordable rental units, in most impacted communities for DR-4558 and DR-4569 to be more resilient to future disasters.

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In response to FRN requirements, proposed mitigation activities utilizing the set-aside must:

Hardening, wildfire retrofitting, of single family and multifamily units to withstand future disasters meets the definition of mitigation by increasing resilience to future wildfires and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future wildfire events.

The mitigation measures, aligned with the scope of work for rehabilitation or reconstruction, and new construction in the case of MHP, involve initial retrofit or bringing the property up to code with Wildland Urban Interface code standards. The WUI codes identify better construction methods and materials to make buildings more ignition-resistant to wildfire. These standards are based on lab-tested and verifiable performance standards that describe the type of wildfire exposure a building must be able to withstand.

The MHP mitigation allows MHP projects to rehabilitate or reconstruct multifamily properties to incorporate mitigation measures. Existing multifamily property owners may apply to a separate NOFA to receive up to \$300,000 in grant assistance from the MHP mitigation set-aside for hardening multifamily units to the WUI code standards. Further details of this program will be forthcoming in a separate action plan amendment.

Mitigation set-aside activities address current & future risks

The MHP Mitigation Program addresses the ubiquitous fire hazard reported across impacted counties by allowing current multifamily property owners to apply (via a separate NOFA) for up to \$300,000 from the set-aside for hardening multifamily units to WUI code standards.

These program features speak directly to the most pressing hazard in communities impacted by DR-4558 and DR-4569 by supporting the physical construction of mitigation measures, as well as codifying mitigation measures into local land use policy.

5.4 2020 Owner Occupied Rehabilitation and Reconstruction

FIGURE 161: 2020 OWNER OCCUPIED REHABILITATION AND RECONSTRUCTION

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
B-21-DZ-06-0001	\$45,838,488.00	\$45,838,488.00	\$45,838,488.00

Program Description

The primary objective of OOR is the provision of decent, safe, and sanitary housing in the areas impacted by the DR-4558 and DR-4569 disasters. Additionally, the program is designed to

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ensure that the housing needs of very-low, low-, and moderate-income households and vulnerable populations, including individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

The program will provide rehabilitation or reconstruction assistance to eligible applicants based on the extent of damage to their primary residences. All projects will incorporate wildfire mitigation measures including the use of ignition-resistant building materials and the creation of defensible space, reducing risk from future wildfire disasters.

For the DR-4610 only, HCD will incorporate rehabilitation and reconstruction of single family rental housing destroyed by the disaster as an eligible OOR activity.

Allocation Amount (Program Level):

100 percent of the funds budgeted for OOR rehabilitation and reconstruction, as well OOR Mitigation, will meet unmet need in the HUD-identified “most impacted and distressed” (MID) counties.

FIGURE 162: 2020 OOR PROGRAMS

OOR Rehabilitation and Reconstruction funded by CDBG-DR funds	\$45,838,488
OOR Mitigation - Home Hardening funded by Mitigation set-aside	\$21,486,863

OOR projects will utilize funds from the budget line items above to cover the costs to rehabilitate or reconstruct owner-occupied residential structure and incorporate mitigation measures. All activity costs allocated to the Mitigation set-aside will meet the definition of mitigation as required by the FRN, 87 FR 6364.

Program Tieback to Disaster/Unmet Needs

HCD will spend 100 percent of the 2020 and 2021 CDBG-DR Allocations, including the mitigation set-aside, in the HUD MID areas. The following counties make up the MID areas for DR-4558 and DR-4569: Butte, Fresno, Los Angeles, Napa, Santa Cruz, Shasta, Siskiyou, Solano, and Sonoma. The DR-4610 MID is limited to Plumas County. Data sources related to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

The home must have been damaged as a result of the qualifying disaster and located in a MID county. Applicants only applying for OOR Mitigation exempt from the requirement to document tieback to DR-4558, DR-4569, and DR-4610.

How Program will Promote Housing for Vulnerable Populations

Applicants receiving OOR funding for rehabilitation or reconstruction together with mitigation funds are prioritized in accordance with the tiers outlined in the prioritization table below: Owner-Occupied Housing Program Applicant Prioritization. HCD will prioritize eligible LMI households (Tiers 1-2) ahead of non-LMI households (Tiers 3-4). This is in recognition of the unique

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recovery challenge LMI households face after disaster as well as HUD's requirement for 70 percent of the total CDBG-DR funding to benefit LMI populations. Within the LMI population, HCD is prioritizing the rehabilitation or reconstruction of houses with major or severe damage over those with lesser damage. HCD equates Major or Severe Damage in this context with the FEMA Substantial Damage definition of a structure that has sustained damage greater than 50 percent of its pre-disaster value. Higher damage levels typically correlate with higher levels of unmet need.

Should funding allow, after serving eligible LMI households (Tiers 1-2), HCD will serve non-LMI households in the same order, (Tier 3), followed by those with non-major/severely damaged homes (Tier 4).

Within each tier, owner occupied households with a household member with a disability or has access or functional needs are given priority. HCD also took into consideration the SoVI analysis, which identified several of the counties with high ratings primarily for increased elderly and disabled populations.

Applicants who apply for mitigation funding are not subject to prioritization. Only LMI households located in the MID counties are allowed to apply for mitigation funds only.

FIGURE 163: CBDG-DR OWNER-OCCUPIED HOUSING PROGRAM APPLICANT PRIORITIZATION TIERS

	Low- to moderate-income (LMI) households	Non-LMI households	Major or Severe Damage	Minor Damage
Tier 1	X		X	
Tier 2	X			X
Tier 3		X	X	
Tier 4		X		X

Program Affordability Period

Not applicable.

Program Definition of Second Home/Eligibility

Assistance for second homes is not an eligible activity.

Program National Objective

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR funded activities must satisfy a national objective. All OOR activities will meet either the urgent need or LMI housing national objective criteria related to disaster recovery. As stated in the Needs Assessment, the location of the disasters presents unique challenges for addressing housing impacts. The disasters impacted households of all incomes and landscapes, including suburban neighborhoods and rural communities. While

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there are regional differences in the housing markets, all of the impacted areas struggle to provide an adequate supply of affordable homes to area residents. The dollar amounts reflected in the budgetary split between OOR which will serve homeowners, and the MHP, which will serve renters, take displacement of LMI would-be applicants into account and the MHP budget is based on FEMA IA data. Thus, the prioritization criteria for participation in OOR will ensure that housing recovery programming will be directed toward LMI beneficiaries. However, HCD understands the devastating impacts the fires had on non-LMI owners, and the urgency to provide assistance and return them to their homes. Figure 63 in the needs assessment shows the impacted counties which had impacts to non LMI homeowners. HCD has made tiers three and four of its prioritizations available to non LMI homeowners in the MID. Utilizing urgent need is critical to ensuring the recovery of the entire community. HCD anticipates that all OOR urgent need funding will be spent in the required 36 months per the FRN.

Program Eligibility

Applicant Eligibility (Per OOR Property)

Applicants will be eligible to participate in the OOR Program if they meet the following criteria:

- Must have owned the home at the time of the qualifying disaster.
- Must have occupied the home as their primary residence at the time of the qualifying disaster.
- Home must be located in a MID county.
- The home must have been damaged as a result of the qualifying disaster and located in a MID county. Applicants only applying for OOR mitigation measures are exempt.
- Must be current on property taxes or have been correctly permitted and permissible for the zoning area or local development standard.
- The property must be a single family dwelling, such as a stick built, modular, or mobile home (i.e., not a condominium, duplex, fourplex, or other multi-owner property).

HCD will assess applicant eligibility on a case-by-case basis according to the eligibility criteria fully defined in the program policy and procedures.

Program Responsible Entity

OOR is delivered at the state level under the guidance of HCD's housing subject matter experts and contract managers. The 2020 program builds on the state's OOR Program for 2017 and 2018 disasters, using its systems and processes to ensure both a rapid startup and iterative improvement. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

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Program Maximum Assistance

Assistance is provided in the form of a grant award to qualifying applicants for the rehabilitation or reconstruction of their primary residence. HCD's construction management vendor enters into an agreement with the property owner and manages and performs all rehabilitation or reconstruction activities, as well as mitigation activities included within the contract scope of work. The award is provided in increments as construction and mitigation activities are completed.

The maximum amount of assistance available for rehabilitation or reconstruction is \$500,000 per damaged structure after applying any duplication of benefits reductions. Reconstruction is permissible where the total cost of rehabilitation is greater than the cost to reconstruct or where rehabilitation is otherwise technically infeasible. Reconstruction is defined as the rebuilding of a structure on the same site in substantially the same manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

In addition to the grant award for rehabilitation or reconstruction, the mitigation set-aside will assist in covering home hardening costs to include the cost of WUI construction codes. The maximum amount of assistance available for the mitigation set-aside is \$50,000 per damaged structure.

Additionally, the OOR Mitigation program is eligible to owner-occupied properties that did not suffer damage in the DR-4558 or DR-4569 events, but are located in the MID, and can utilize the rehabilitation activity to enable the single family unit to meet the WUI code standards to make their homes more resistant to wildfire. OOR applicants applying for rehabilitation to bring their homes up to WUI code standards may receive up to \$50,000 in grant assistance.

Hardships: As a standard practice, OOR applicants requiring more than the cap on assistance must fund the remainder of their project with private funds or other resources, however, exceptions to the maximum award will be considered on a case-by-case basis. In situations where the applicant has a demonstrable hardship, the specific conditions will be evaluated to determine how best to proceed.

A demonstrable hardship is a substantial or unexpected change in the applicant's situation after a disaster that prohibits or severely affects their ability to provide a minimal standard of living or the basic necessities of life, including food, housing, clothing, and transportation. Such instances typically include job loss, business failure, divorce, severe medical illness, and disability. Program staff will evaluate instances of demonstrable hardship on a case-by-case basis after review of the circumstances. The criteria for documenting such hardship may have the award cap increased up to the amount required to complete the repair or reconstruction of their property.

Program Estimated Begin and End Dates

The OOR Program is expected to commence following HUD's approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

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Other Program Details

Deed Restrictions and Restrictive Covenants

To safeguard the CDBG-DR investment in the property, HCD requires a deed restriction or restrictive covenant on properties funded through the program. The deed restriction or restrictive covenant remains in effect for a period of two years following the date of receipt of the certificate of occupancy of the rehabilitated or reconstructed structure. For the length of the deed restriction or restrictive covenant, the property must remain as the primary residence of the owner-occupants to whom the rehabilitation/reconstruction grant was made. Selling the property, using it as a second home, converting it into rental property, or otherwise changing its owner of record will result in non-compliance. Properties will be monitored annually by HCD for compliance with the deed restrictive covenant and failure to comply with the deed restriction or restrictive covenant will result in grant fund recovery.

The deed restriction or restrictive covenant may be released on a case-by-case basis by HCD in certain circumstances. The specific language and requirements in the deed restriction or restrictive covenant will be set forth in the program policies and procedures and will be available for applicants participating in the OOR program.

Eligible and Ineligible Costs

Eligible Costs include:

- Permitting, design, and planning
- Replacement of damaged or destroyed necessary equipment, such as HVAC units
- Repairs to or replacement of damaged on-site utilities such as water, sewer, electric, and gas
- Repairs to disaster damaged primary structures with standard grade materials
- Reconstruction of the disaster damaged primary structure with standard grade materials
- Upgrades required to meet current building code
- Site work to meet WUI standards
- Handicap accessibility features (if applicable)
- Lead-based paint and asbestos abatement (if applicable)
- Housing Counseling
- Tenant Relocation under the URA

Eligible costs utilizing CDBG-DR funds must be expended for activities that document tie-back to the disaster event, with the exception of activities utilizing the mitigation set-aside.

Eligible costs for OOR Mitigation only projects will include costs associated with bringing the home up to the WUI code standards as defined in the policies and procedures.

Ineligible Costs include:

- Repair or replacement of auxiliary structures, such as detached garages or carports, storage units, outhouses, or sheds
- Materials greater than standard grade unless required by the local jurisdiction or by state law, such as certain green building requirements

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- Partial or incomplete repairs or reconstructions of properties
- Multifamily, condominiums, duplexes, triplexes, fourplexes or other rental property
- Repair or replacement of luxury or non-critical items, such as swimming pools and security systems
- Repair or replacement of personal property or building contents
- New home purchase
- New construction off-site of the damaged structure (except in the case of a mobile home unit in a mobile home park where the park is permanently closed due to the disaster)
- Forced mortgage payoffs
- Assistance for second homes
- Uniform Relocation

Reimbursement is available for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation of eligible tenants, including the cost of moving to and from temporarily occupied housing and any increase in monthly rent or utility costs at temporary housing. These costs will be reviewed for cost reasonableness and initially be paid by the Uniform Relocation vendor procured by HCD.

Housing Counseling

HCD understands the individualized nature of disaster recovery, and the complexities of the recovery process, as well as the necessity to join in that process to provide support and guidance through that process. As such, HCD offers a housing counseling program for disaster impacted individuals to include up to two optional counseling opportunities and one required counseling opportunity to support their housing recovery process.

HCD's Housing Counseling Program provides eligible residents guidance and counseling for their housing needs related to impacts from the 2020 natural disasters, as well as housing needs related to impacts from both the 2017 and 2018 natural disasters.

Current homeowners entering into the ReCoverCA housing programs receive counseling services on property maintenance, financial management, disaster recovery funding resources, financial and credit literacy, and other areas as needed and appropriate to assist in helping ReCoverCA program participants determine their housing recovery plan, improve their housing conditions, and meet their financial goals.

Traditionally underserved populations, state and federally protected classes, including racial and ethnic minorities, the elderly, veterans, persons with disabilities, persons with limited English proficiency, and residents of rural areas, face unique disaster recovery housing, and economic challenges.⁸¹ HCD's ReCoverCA Housing Counseling Program provides expert, unbiased guidance, and information to help families and individuals, particularly the most vulnerable, meet their housing needs through an informed decision-making process.

⁸¹ For more information on federal and state protected classes, see HCD's 2020 Analysis of Impediments to Fair Housing: <https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>.

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Resilience Performance Metrics

HCD will establish resilience performance metrics before carrying out OOR program activities. See description of resilience performance metrics under III.M. Preparedness, Mitigation, and Resiliency.

Program Competitive Application Overview

Not applicable.

Program Method of Distribution Description/Overview

OOR is delivered at the state level under the guidance of HCD's housing subject matter experts and contract managers. The 2020 and 2021 program builds on the state's OOR Program for 2017 and 2018 disasters, using its systems and processes to ensure both a rapid startup and iterative improvement. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

Mitigation set-aside activities will meet definition of mitigation

Hardening, wildfire retrofitting, of single family and multifamily units to withstand future disasters meets the definition of mitigation by increasing resilience to future wildfires and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future wildfire events.

In response to the FRN requirements for all construction related activities to incorporate mitigation measures, the OOR Program incorporates mitigation measures that meet the definition of mitigation, therefore satisfying the requirement to track these mitigation activities through the MIT activity type in the Disaster Recovery and Grant Reporting (DRGR) system and the eligible use of the CDBG-DR Mitigation set-aside.

Mitigation set-aside activities will address current and future risks?

As required by the FRN, this Action Plan includes a risk-based Mitigation Needs Assessment to inform proposed uses of the CDBG-DR mitigation set-aside. The programs proposed in this Action Plan as eligible for the mitigation set-aside were designed to respond directly to the current hazards, future hazards, risks, and needs described in the Mitigation Needs Assessment.

A review of hazards indexed by the 2018 California State Hazard Mitigation Plan found that earthquakes, flood, and fire rank as the state's primary hazards, having caused the greatest loss of life and property and disruption to economic, social, and environmental systems.

On the county level, 15 of the 21 jurisdictions impacted by DR-4558 and/or DR-4569 ranked their local fire hazard as "high," three reported fire as a "moderate to low" hazard, and three

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could not provide hazard ranking data. Given the catastrophic impact of the 2020 wildfire season and the series of destructive seasons and incidents preceding 2020, California's history and projections of severe fire incidents highlight parcel-level and community-scale wildfire mitigation as a top priority. The Mitigation Needs assessment also illustrated that a combination of economic support for hazard interventions and mitigation-focused policy is the most effective approach to preparing communities for future threats.

The OOR Mitigation Program addresses the ubiquitous fire hazard reported across impacted counties in two significant ways:

On the individual property level, the program helps homeowners mitigate risk on their parcels by covering home hardening costs for eligible owner-occupied structures.

On the local jurisdiction level, the program supports community-wide hazard mitigation by funding the development of local WUI construction codes that allow counties to regulate and mitigate high-risk conditions in fire-prone areas, including the cost of WUI construction codes, for eligible structures.

For single family units that did not suffer damage during the 2020 wildfires, eligible applicants can utilize the rehabilitation DR activity to owners of single family units to meet WUI code standards to make their homes more resistant to wildfire.

These program features speak directly to the most pressing hazard in communities impacted by DR-4558 and DR-4569 by supporting the physical construction of mitigation measures, as well as codifying mitigation measures into local land use policy.

5.5 2020 OOR Mitigation

FIGURE 164: 2020 OOR MITIGATION

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
B-21-DZ-06-0001	\$21,486,863.00	\$21,486,863.00	\$21,486,863.00

Program Description

The OOR program is eligible to applicants awarded funds to rehabilitate or reconstruct their home that suffered damage from the DR-4558 or DR-4569 disaster events occurring in the fall of 2020. The OOR program incorporates mitigation measures into the rehabilitation or reconstruction in a manner that satisfies the use of the Mitigation set-aside.

The maximum assistance available for rehabilitation or reconstruction is \$500,000 per damaged structure after applying any duplication of benefits reductions. In addition, the OOR mitigation

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set-aside will assist in covering home hardening costs to include the cost of WUI construction codes. The set-aside is available in amounts not to exceed 10 percent of each applicant's rehabilitation or reconstruction CDBG-DR award.

Additionally, the OOR Program is eligible to owner-occupied properties that did not suffer damage in the DR-4558 or DR-4569 events but are in the MID and are low to moderate income. These households can utilize the rehabilitation activity to enable the single family unit to meet the WUI code standards to make their homes more resistant to wildfire. OOR applicants applying for rehabilitation to bring their homes up to WUI code standards may receive up to \$50,000 in grant assistance.

Program Tieback to Disaster/Unmet Needs

Program tieback to unmet need is not required by the FRN for utilization of the mitigation set-aside. However, the mitigation set-aside activities must benefit the most impacted and distressed areas (MID) from DR-4558 and DR-4569. Projects proposing to utilize mitigation set-aside funds for OOR must be for households located in the MID areas.

How Program will Promote Housing for Vulnerable Populations

Affirmative Marketing

The program management consultant will follow HCD's affirmative marketing procedures for outreach to protected class groups least likely to apply to the OOR Program. Additionally, materials will be provided in languages other than English, such as Spanish, to accommodate LEP persons. Language access services for persons who are LEP and the availability of accessible features and reasonable accommodations for persons with disabilities will be provided to applicants through case management.

Housing Counseling

HCD understands the individualized nature of disaster recovery, and the complexities of the recovery process, as well as the necessity to join in that process to provide support and guidance through that process. As such, a housing counseling program for disaster impacted individuals is included as part of the OOR and HBA Programs. Applicants are connected with Housing Counseling Agencies. The process includes up to two optional counseling opportunities and one required counseling opportunity to support their housing recovery process.

HCD's Housing Counseling Program provides eligible residents guidance and counseling for their housing needs related to impacts from the 2020 natural disasters, as well as housing needs related to impacts from both the 2017 and 2018 natural disasters.

Current homeowners entering into the ReCoverCA housing programs receive counseling services on property maintenance, financial management, disaster recovery funding resources, financial and credit literacy, and other areas as needed and appropriate to assist in helping ReCoverCA program participants determine their housing recovery plan, improve their housing conditions, and meet their financial goals.

Traditionally underserved populations, state and federally protected classes, including racial and ethnic minorities, the elderly, veterans, persons with disabilities, persons with limited English

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proficiency, and residents of rural areas, face unique disaster recovery housing, and economic challenges.⁸² HCD’s ReCoverCA Housing Counseling Program provides expert, unbiased guidance, and information to help families and individuals, particularly the most vulnerable, meet their housing needs through an informed decision-making process.

Prioritization

Applicants receiving OOR funding for rehabilitation and reconstruction and mitigation funds together are prioritized in accordance with the tiers outlined in (Figure): Owner-Occupied Housing Program Applicant Prioritization. HCD will prioritize eligible LMI households (Tiers 1-2) ahead of non-LMI households (Tiers 3-4). This is in recognition of the unique recovery challenges LMI households face after disaster as well as HUD’s requirement for 70 percent of the total CDBG-DR funding to benefit LMI populations. Within the LMI population, HCD is prioritizing the rehabilitation or reconstruction of houses with major or severe damage over those with lesser damage. HCD equates Major or Severe Damage in this context with the FEMA Substantial Damage definition of a structure that has sustained damage greater than 50 percent of its pre-disaster value. Higher damage levels typically correlate with higher levels of unmet need.

Should funding allow, after serving eligible LMI households (Tiers 1-2), HCD will serve non-LMI households in the same order, (Tier 3), followed by those with non-major/severely damaged homes (Tier 4).

Within each tier, owner occupied households with a household member with a disability or has access or functional needs are given priority. HCD also took into consideration the SoVI analysis, which identified several of the counties with high ratings primarily for increased elderly and disabled populations.

Applicants who apply for mitigation funding are not subject to prioritization. Only LMI households located in the MID counties are allowed to apply for mitigation funds only.

FIGURE 165: CBDG-DR OWNER-OCCUPIED HOUSING PROGRAM APPLICANT PRIORITIZATION TIERS

	Low- to moderate-income (LMI) households	Non-LMI households	Major or Severe Damage	Minor Damage
Tier 1	X		X	
Tier 2	X			X
Tier 3		X	X	
Tier 4		X		X

⁸² For more information on federal and state protected classes, see HCD’s 2020 Analysis of Impediments to Fair Housing: <https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>.

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Program Affordability Period

Deed Restrictions and Restrictive Covenants

To safeguard the CDBG-DR investment in the property, HCD requires a deed restriction or restrictive covenant on properties funded through the program. The deed restriction or restrictive covenant remains in effect for a period of two years following the date of receipt of the certificate of occupancy of the rehabilitated or reconstructed structure. For the length of the deed restriction or restrictive covenant, the property must remain as the primary residence of the owner-occupants to whom the rehabilitation/reconstruction grant was made. Selling the property, using it as a second home, converting it into rental property, or otherwise changing its owner of record will result in non-compliance. Properties will be monitored annually by HCD for compliance with the deed restrictive covenant and failure to comply with the deed restriction or restrictive covenant will result in grant fund recovery.

The deed restriction or restrictive covenant may be released on a case-by-case basis by HCD in certain circumstances. The specific language and requirements in the deed restriction or restrictive covenant will be set forth in the program policies and procedures and will be available for applicants participating in the OOR program.

Recapture of Program Funds

Under the OOR or OOR MIT an applicant may be required to repay all, or a portion of the assistance received from the Program. The reasons for grant recapture may include the following reasons:

- Providing false or misleading information to the OOR
- Withdrawal from OOR prior to completion of the project. Withdrawal from the program must be in writing or email and a new survey and application will be required if the applicant wishes to participate again.
- Construction is not completed due to non-cooperation by owner(s).
- Non-compliance with the approved SOW in a manner that would make the home ineligible (i.e., did not comply with lead paint abatement requirements).
- Failure to report the receipt of additional insurance, SBA, FEMA, non-profit assistance and/or any other DOB received after award.
- To address any potential future DOB, applicant beneficiaries must, as a requirement for participating in OOR, agree to enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, after an award is issued, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

Program Definition of Second Home Eligibility

Assistance for second homes is not an eligible cost for the OOR Program.

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Program National Objective

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR mitigation set-aside funded activities must satisfy a national objective. All OOR activities will meet either the LMI housing or the urgent need national objective criteria related to disaster recovery.

Program Eligibility

Eligible Activity

The use of the mitigation set-aside must ensure that proposed activities are CDBG eligible under title I of the Housing and Community Development Act, or otherwise eligible pursuant to a waiver of alternative requirement in the FRN:

HCDA Section 105(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvement (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).

The eligibility of housing projects is further established in the Consolidated Notice (FRN), 87 FR 6370, which requires HCD to address unmet housing needs with CDBG-DR funds. New housing construction is also eligible as established in the FRN, 87, FR 6371, paragraph B.1 of Section II.

Through the FRN, 87 FR 6370, HUD adopts alternative requirements to activities eligible under the Housing and Community Development Act (HCDA) Section 105(a), which allows California to carry out modified activities to comply with the requirements in the FRN to incorporate mitigation measures as a construction standard.

The criteria to meet the FRN requirements for HCD to utilize the mitigation set-aside are described in this section, while all program and eligibility requirements for the OOR Program are explained in the respective OOR program section.

Applicants will be eligible to participate in the OOR Program if they meet the following criteria:

- Must have owned the home at the time of the qualifying disaster.
- Must have occupied the home as their primary residence at the time of the qualifying disaster.
- Home must be located in a MID county.
- The home must have been damaged as a result of the qualifying disaster and located in a MID county. Applicants only applying for OOR Mitigation measures are exempt.
- Must be current on property taxes or have an approved payment plan or tax exemption.
- The property must have been correctly permitted and permissible for the zoning area or local development standard.

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- The property must be a single family dwelling, such as a stick built, modular, or mobile home (i.e., not a condominium, duplex, fourplex, or another multi-owner property).

HCD will assess applicant eligibility on a case-by-case basis according to the eligibility criteria fully defined in the program policies and procedures.

Program Responsible Entity

HCD will directly operate the OOR Program, which includes activities within the program that will utilize funds for mitigation through the OOR Mitigation set-aside.

OOR is delivered at the state level under the guidance of HCD's housing subject matter experts and contract managers. The 2020 program builds on the state's OOR Program for 2017 and 2018 disasters, using its systems and processes to ensure both a rapid startup and iterative improvement. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

Program Maximum Assistance

Assistance is provided in the form of a grant award to qualifying applicants for the rehabilitation or reconstruction of their primary residence. HCD's construction management vendor enters into an agreement with the property owner and manages and performs all rehabilitation or reconstruction activities, as well as mitigation activities included within the contract scope of work. The award is provided in increments as construction and mitigation activities are completed.

In addition to the grant award for rehabilitation or reconstruction (\$500,000) the mitigation set-aside will assist in covering home hardening costs to include the cost of WUI construction codes; the set-aside is available in amounts not to exceed 10 percent of each applicant's rehabilitation or reconstruction CDBG-DR award.

Additionally, the OOR Mitigation program is eligible to owner-occupied properties that did not suffer damage in the DR-4558 or DR-4569 events, but are located in the MID, and can utilize the rehabilitation activity to enable the single family unit to meet the WUI code standards to make their homes more resistant to wildfire. OOR applicants applying for rehabilitation to bring their homes up to WUI code standards may receive up to \$50,000 in grant assistance.

Hardships: As a standard practice, OOR applicants requiring more than the cap on assistance must fund the remainder of their project with private funds or other resources, however, exceptions to the maximum award will be considered on a case-by-case basis. In situations where the applicant has a demonstrable hardship, the specific conditions will be evaluated to determine how best to proceed.

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A demonstrable hardship is a substantial or unexpected change in the applicant's situation after a disaster that prohibits or severely affects their ability to provide a minimal standard of living or the basic necessities of life, including food, housing, clothing, and transportation. Such instances typically include job loss, business failure, divorce, severe medical illness, and disability. Program staff will evaluate instances of demonstrable hardship on a case-by-case basis after review of the circumstances. The criteria for documenting such hardship may have the award cap increased up to the amount required to complete the repair or reconstruction of their property.

Program Estimated Begin and End Dates

The OOR Program is expected to commence following HUD's approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

Other Program Details

Reimbursement is available for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation of eligible tenants, including the cost of moving to and from temporarily occupied housing and any increase in monthly rent or utility costs at temporary housing. These costs will be reviewed for cost reasonableness and initially be paid by the Uniform Relocation vendor procured by HCD.

Program Competitive Application Overview

Not applicable.

Program Method of Distribution Description/Overview

HCD will directly operate the Disaster Recovery Owner-Occupied Housing Rehabilitation and Reconstruction and Mitigation Owner-Occupied Housing Rehabilitation and Reconstruction Program (OOR). For the OOR Program, staff will engage impacted homeowners statewide to apply for assistance. HCD will utilize a qualified vendor to perform full scale program management duties to augment HCD capacity and ensure high quality customer service delivery. Program staff will work with the procured vendor to maintain program timeliness, provide oversight, and ensure all levels of the program are compliant.

Mitigation set-aside activities meet definition of mitigation

Hardening, wildfire retrofitting, of single family and multifamily units to withstand future disasters meets the definition of mitigation by increasing resilience to future wildfires and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future wildfire events.

The WUI codes identify better construction methods and materials to make buildings more ignition-resistant to wildfire. These standards are based on lab-tested and verifiable performance standards that describe the type of wildfire exposure a building must be able to withstand.

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Mitigation set-aside activities address current and future risks

The OOR Mitigation Program addresses the ubiquitous fire hazard reported across impacted counties in two significant ways:

- On the individual property level, the program helps homeowners mitigate risk on their parcels by covering home hardening costs for eligible owner-occupied structures
- For single family units that did not suffer damage during the 2020 wildfires, eligible applicants can utilize the rehabilitation DR activity to owners of single family units to meet WUI code standards to make their homes more resistant to wildfire.

These program features speak directly to the most pressing hazard in communities impacted by DR-4558 and DR-4569 by supporting the physical construction of mitigation measures, as well as codifying mitigation measures into local land use policy.

Incorporation of Mitigation Measures

HCD will incorporate mitigation measures into activities under the OOR by meeting or exceeding the State of California building code, which incorporates mitigation measures. For example, there are minimum standards for materials and material assemblies to provide a reasonable level of exterior wildfire exposure protection for buildings in WUI areas; in high-risk fire areas, WUI code is also applied, which is an additional code upgrade that includes fire resistant exterior materials and requirements to maintain defensible space around the home. The program will apply the mitigation measures in the WUI code to areas both inside and outside of where it is mandated by code. In addition, the code requires indoor fire sprinklers for single family homes. All residential construction projects must comply with the current published housing construction codes for the State of California. Housing construction codes for building in California follow federal and state laws, regulations, and adaptations for construction of single family and multifamily units.

Building standards are published as the California Buildings Standards Code under the California Code of Regulations, Title 24, and construction standards must meet or exceed all applicable requirements for housing or building construction.

Construction standards for HCD's housing projects can be referenced online at:
<https://www.hcd.ca.gov/building-standards-hcd>.

Specific code compliance to achieve hazard mitigation, such as WUI codes, are implemented where applicable according to local code and the unique needs of impacted communities. Applying WUI codes to areas within the burn scar but outside of declared WUI areas recognizes that risk maps cannot keep pace with the rapidly changing fire risk.

WUI codes are designed to mitigate the risks from wildfire to life and property. The standards within a WUI code vary according to the scope that a community is willing to adopt and enforce. WUI area codes may include the following topics:

Structure density and location: number of structures allowed in areas at risk from wildfire, plus setbacks (distance between structures and distance between other features such as slopes).

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Building materials and construction: roof assembly and covering, eaves, vents, gutters, exterior walls, windows, non-combustible building materials, and non-combustible surface.

Vegetation management: tree thinning, spacing, limbing, and trimming; removal of any vegetation growing under tree canopies (typically referred to as “ladder fuels”), surface vegetation removal, and brush clearance; vegetation conversion, fuel modifications, and landscaping.

Emergency vehicle access: driveways, turnarounds, emergency access roads, marking of roads, and property address markers.

Water supply: approved water sources and adequate water supply.

Fire protection: automatic sprinkler system, spark arresters, and propane tank storage.

5.6 2020 FEMA Public Assistance Match

FIGURE 166: 2020 FEMA PUBLIC ASSISTANCE MATCH

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
B-21-DZ-06-0001	\$7,639,748.00	\$7,639,748.00	\$7,639,748.00

Program Description

The Infrastructure Program aligns infrastructure investments with other planned federal funds in that the CDBG-DR funds will be used to fund the non-federal share match on approved FEMA Public Assistance (PA) projects. The non-federal share match on approved FEMA PA projects is an eligible use of CDBG-DR funds. HCD may use grant funds to satisfy the FEMA PA Program’s local match if the use otherwise meets all CDBG-DR requirements. The CDBG-DR allocation for Infrastructure Program provides the non-federal share match on approved FEMA PA projects.

HCD will coordinate with Cal OES and the local jurisdictions to ensure that the FEMA PA projects meet the following FRN requirements for infrastructure projects:

How mitigation measures and strategies to reduce natural hazard risks, including climate-related risks, will be integrated into rebuilding activities;

The extent to which CDBG-DR funded infrastructure activities will achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction;

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How the local jurisdiction will employ adaptable and reliable technologies to prevent premature obsolescence for the project-related infrastructure construction.

HCD will fund the local portion of the non-federal share match for FEMA Category C (roads and bridges), Category D (water control facilities), Category E (public buildings and contents), and Category F (utilities), and Category G (parks, recreational, and other activities). Utilization of CDBG-DR funds as matching funds for a FEMA PA project requires for the CDBG-DR funds to be expended on an eligible CDBG activity. Program policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating project proposals.

Program Tieback to Disaster/Unmet Needs

Applications from eligible jurisdictions must identify unmet need resulting from the local match requirement from the PA project resulting from the DR-4558 or DR-4569 disasters.

How Program will Advance Long-Term Resilience

HCD will coordinate with CALOES and the local jurisdictions to ensure that the proposed FEMA PA projects meet the following FRN requirements for infrastructure projects:

How mitigation measures and strategies to reduce natural hazard risks, including climate-related risks, will be integrated into rebuilding activities;

The extent to which CDBG-DR funded infrastructure activities will achieve objectives outlined in regionally or locally established plans and policies that are designed to reduce future risk to the jurisdiction;

How the local jurisdiction will employ adaptable and reliable technologies to prevent premature obsolescence for the project-related infrastructure construction.

How Program will Address Disaster-Related Storm Water Management and Other Systems

HCD will fund the local portion of the non-federal share match for FEMA Category C (roads and bridges), Category D (water control facilities), Category E (public buildings and contents), and Category F (utilities), and Category G (parks, recreational, and other activities). Utilization of CDBG-DR funds as matching funds for a FEMA PA project requires for the CDBG-DR funds to be expended on an eligible CDBG activity. Program policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating project proposals.

Program National Objective(s)

In accordance with 24 CFR 570.208, all CDBG-DR funded activities must satisfy a national objective. For the infrastructure program, all projects will meet the low-and moderate income (LMI) or urgent need national objective. Infrastructure funding requires a case-by-case analysis of each project for meeting these requirements. It is the responsibility of the local government to substantiate the national objective as part of its proposal to HCD.

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Program Eligibility

The eligible applicants for Infrastructure Recovery Program funds are municipal and county governments in the MID that received FEMA Public Assistance funds for permanent infrastructure projects (Categories C through G) related to the DR-4558 and DR-4569 disaster events.

Program Responsible Entity

HCD will provide technical assistance and coordinate closely with local governments during the application phase. Once proposals are reviewed, HCD will provide funds to subrecipients for the local match for their FEMA PA projects in accordance with a Standard Agreement with the local government. Monthly progress reports will be required from the subrecipient, and reimbursement will be provided to the subrecipient based on the documented completion of agreed upon project milestones. As projects are selected, HCD will continue to provide technical assistance and complete regular monitoring throughout the project lifecycle.

Program Maximum Assistance

The maximum assistance allowable per project is the amount necessary to meet the local match requirement on a project-by-project basis based on the funding cap for each county.

Program Estimated Begin and End Dates

Applications will be released in the quarter following HUD approval of this Action Plan and the Implementation and Capacity document. Technical assistance will be provided until sufficient applications are received and approved to expend the entire allocation of Infrastructure Recovery Program funds. Individual project completion timeframes will be determined on a case-by-case basis with the subrecipients, in accordance with their agreement.

Other Program Details

Eligible and Ineligible Costs

HCD commits to funding activities eligible under Title I of the Housing and Community Development Act of 1974 or those activities specified by waiver in 83 FR 5851. CDBG-DR funds may fund the following activities:

Required FEMA PA local portion of the non-federal share match funding for approved projects under the following FEMA PA permanent work categories:

- Category C (Road and bridges);
- Category D (Water control facilities);
- Category E (Public buildings and contents);
- Category F (Public utilities); and
- Category G (Parks, recreational, and other facilities).

Required non-federal share match for approved projects that meet the CDBG-DR requirements, including a tie-back to the DR-4558 and DR-4569 disaster events, is an eligible activity. Eligible

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projects will be located in the HUD MID areas as explained in Section II. C.1. In addition, HCD may fund ADCs related to the implementation of these projects.

Ineligible costs include:

- Required FEMA PA Match funding for approved projects under Categories A (Debris Removal) and Category B (Emergency Protective Measures).
- FEMA HMGP projects not related to infrastructure and/or without a tieback to the 2020 disaster events.
- Projects not related to infrastructure, increased code compliance, or DR-4558 and DR-4569 disaster events.

Program Competitive Application Overview

HCD will make Infrastructure Program funding available to impacted jurisdictions in the MID based on the application process for impacted counties and municipalities to request funding for unmet non- federal share local match needs.

Eligible jurisdictions may submit applications with multiple proposed projects that meet categories D and F requirements and support housing recovery. The application will require the jurisdictions to prioritize the requests in the event that not all projects are eligible or can be funded.

HCD will ensure that construction costs are reasonable and consistent with market costs for the location of the FEMA PA project. HCD will require that the construction contractor implement cost control measures or verify that reimbursable costs were correctly controlled during the project. Standard Agreements with jurisdictions will include subrogation clauses in case of the event of non-compliance with the applicable requirements and regulations.

Furthermore, HCD will adopt the benefit-cost analysis conducted by local jurisdictions to comply with the requirements of FEMA PA projects. The completed BCA will be required as part of the application package submitted to HCD.

Program Method of Distribution Description/Overview

HCD will make Infrastructure Program funding available to impacted jurisdictions in the MID based on the application process for impacted counties and municipalities to request funding for unmet non- federal share local match needs.

5.7 2021 Single Family Reconstruction

FIGURE 167: 2021 SINGLE FAMILY RECONSTRUCTION

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
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B-21-DF-06-0001	\$12,193,250	\$12,193,250	\$0
B-22-DF-06-0001	\$7,969,550	\$7,969,550	\$0

Program Description

The primary objective of the Single Family Reconstruction Program is the reconstruction of decent, safe, and sanitary housing in the most impacted and distressed areas impacted by the DR-4610 disasters. The program will have two activities: 1) reconstruction of LMI owner-occupied single family homes destroyed/damaged in the qualifying event and 2) reconstruction of single family homes destroyed/damaged in the qualifying event, to be rebuilt as affordable single family rentals.

All projects will incorporate wildfire mitigation measures including the use of ignition-resistant building materials and the creation of defensible space, reducing risk from future wildfire disasters, consistent with California’s Chapter 7A WUI Building Code.

Allocation Amount (Program Level):

100 percent of the funds budgeted for Single Family Reconstruction, as Single Family Mitigation will meet unmet need in the HUD-identified “most impacted and distressed” (MID) counties.

Program Tieback to Disaster/Unmet Needs

HCD will spend 100 percent of the 2021 CDBG-DR allocation, including the mitigation set-aside, in the HUD MID areas. The DR-4610 MID is limited to Plumas County. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan. The home must have been damaged as a result of the qualifying disaster and located in the MID (Plumas County). Applicants applying for Single Family Mitigation are exempt from the requirement to document tieback to DR-4610.

How Program will Promote Housing for Vulnerable Populations

Applicants eligible for Single Family Reconstruction funding must be LMI and the home must be located in Plumas County. Residences must have experienced major or severe damage in the qualifying disaster. HCD equates **Major or Severe Damage** in this context with the FEMA Substantial Damage definition of a structure that has sustained damage greater than 50 percent of its pre-disaster value. Higher damage levels typically correlate with higher levels of unmet need.

Affirmative Marketing

The program management consultant will follow HCD’s affirmative marketing procedures for outreach to protected class groups least likely to apply to the Single Family Reconstruction Program. The program will proactively reach persons over age 65 and persons with disabilities.

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Housing Counseling

HCD understands the individualized nature of disaster recovery, and the complexities of the recovery process, as well as the necessity to join in that process to provide support and guidance through that process. As such, a housing counseling program for disaster impacted individuals is included as part of the Single Family Reconstruction, OOR, and HBA Programs. Applicants are connected with Housing Counseling Agencies. The process includes up to two optional counseling opportunities and one required counseling opportunity to support their housing recovery process.

HCD’s Housing Counseling Program provides eligible residents guidance and counseling for their housing needs related to impacts from the 2020 and 2021, as well as housing needs related to impacts from both the 2017 and 2018 natural disasters. HCD is adding a housing counseling option for 2021 Single Family Reconstruction program participants.

Current homeowners entering into the ReCoverCA housing programs receive counseling services on property maintenance, financial management, disaster recovery funding resources, financial and credit literacy, and other areas as needed and appropriate to assist in helping ReCoverCA program participants determine their housing recovery plan, improve their housing conditions, and meet their financial goals.

Traditionally underserved populations, state and federally protected classes, including racial and ethnic minorities, the elderly, veterans, persons with disabilities, persons with limited English proficiency, and residents of rural areas, face unique disaster recovery housing, and economic challenges.⁸³ HCD’s ReCoverCA Housing Counseling Program provides expert, unbiased guidance, and information to help families and individuals, particularly the most vulnerable, meet their housing needs through an informed decision-making process.

Program Affordability Period

For DR-4610 only, single family rental homes rehabilitated or rebuilt through this program must be deed restricted as affordable for LMI households for 5-15 years, depending on amount of program subsidy. There is no affordability period for owner-occupied reconstruction projects.

FIGURE 168: 2021 SINGLE FAMILY RENTAL AFFORDABILITY PERIOD & MAXIMUM SUBSIDY

Affordability Period	Maximum Subsidy
Year 5 (Minimum)	\$367,450
Year 6	\$380,940
Year 7	\$394,430

⁸³ For more information on federal and state protected classes, see HCD’s 2020 Analysis of Impediments to Fair Housing: <https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>.

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Year 8	\$407,920
Year 9	\$ 421,410
Year 10	\$434,900
Year 11	\$ 448,390
Year 12	\$461,880
Year 13	\$475,370
Year 14	\$488,860
Year 15	\$500,000 (Maximum)

Program Definition of Second Home/Eligibility

Assistance for second homes is not an eligible activity, unless the second home is eligible to be reconstructed as part of the Program’s Single Family Rental activity.

Program National Objective

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR funded activities must satisfy a national objective. All OOR activities will meet either the urgent need or LMI housing national objective criteria related to disaster recovery. As stated in the Needs Assessment, the location of the disasters presents unique challenges for addressing housing impacts. The disasters impacted households of all incomes and landscapes, including suburban neighborhoods and rural communities. While there are regional differences in the housing markets, all of the impacted areas struggle to provide an adequate supply of affordable homes to area residents. The dollar amount directed towards the Single Family Reconstruction program reflects the type of tenure of housing losses in the qualifying disaster. This program aims for 100 percent of funds to be used towards the LMI national objective by requiring beneficiaries to be LMI households.

Program Eligibility

Applicant Eligibility

Owner-Occupants

Applicants who are owner-occupants will be eligible to participate in the Single Family Reconstruction Program if they meet the following criteria:

- Must have owned the home at the time of the qualifying disaster.
- Must have occupied the home as their primary residence at the time of the qualifying disaster.
- The home must have experienced major/severe damage or been destroyed as a result of the qualifying disaster and located in the MID.
- Must be LMI, as defined by the CDBG Program.
- Must be current on property taxes or have been correctly permitted and permissible for the zoning area or local development standard.

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- The property must be a single family dwelling, such as a stick built, modular, or mobile home (i.e., not a condominium, duplex, fourplex, or other multi-owner property).

HCD will assess applicant eligibility on a case-by-case basis according to the eligibility criteria fully defined in the program policy and procedures.

Single Family Landlords

For DR-4610 only, individual owners of single family homes at the time of the qualifying disaster will be eligible for the Single Family Reconstruction Program for the purpose of reconstructing single family rental units if they meet the following criteria:

- The applicant must have owned the unit at the time of the qualifying disaster.
- The home must have experienced major/severe damage or been destroyed as a result of the qualifying disaster and located in the MID.
- Any reconstructed units used for single family rental will be deed restricted as affordable for LMI households for a duration ranging from 5-15 years depending on the subsidy provided.
- Single family landlords need not be LMI themselves, and the applicant may have occupied the qualifying unit as a primary residence at the time of the disaster.
- Must be current on property taxes or have been correctly permitted and permissible for the zoning area or local development standard.
- The property must be a single family dwelling, such as a stick built, modular, or mobile home (i.e., not a condominium, duplex, fourplex, or other multi-owner property).

Program Responsible Entity

The Single Family Reconstruction Program is delivered at the state level under the guidance of HCD's housing subject matter experts and contract managers, leveraging the 2020 OOR program infrastructure. The 2020 itself program builds on the state's OOR Program for 2017 and 2018 disasters, using its systems and processes to ensure both a rapid startup and iterative improvement. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

Program Maximum Assistance

Assistance is provided in the form of a grant award to qualifying applicants for the rehabilitation or reconstruction of their primary residence. HCD's construction management vendor enters into an agreement with the property owner and manages and performs all rehabilitation or reconstruction activities, as well as mitigation activities included within the contract scope of work. The award is provided in increments as construction and mitigation activities are completed.

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For owner-occupants or single family landlords, the maximum amount of assistance available for rehabilitation or reconstruction is \$500,000 per damaged structure after applying any duplication of benefits reductions. Reconstruction is permissible where the total cost of rehabilitation is greater than the cost to reconstruct or where rehabilitation is otherwise technically infeasible. Reconstruction is defined as the rebuilding of a structure on the same site in substantially the same manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

For owners who will rent the residence, the subsidy maximum rises with the affordability period, as detailed in the figure below.

FIGURE 169: 2021 SINGLE FAMILY RENTAL AFFORDABILITY PERIOD AND MAXIMUM SUBSIDY

Affordability Period	Maximum Subsidy
Year 5 (Minimum)	\$367,450
Year 6	\$380,940
Year 7	\$394,430
Year 8	\$407,920
Year 9	\$ 421,410
Year 10	\$434,900
Year 11	\$ 448,390
Year 12	\$461,880
Year 13	\$475,370
Year 14	\$488,860
Year 15	\$500,000 (Maximum)

Hardships: As a standard practice, Single Family Reconstruction applicants requiring more than the cap on assistance must fund the remainder of their project with private funds or other resources, however, exceptions to the maximum award will be considered on a case-by-case basis. In situations where the applicant has a demonstrable hardship, the specific conditions will be evaluated to determine how best to proceed.

A demonstrable hardship is a substantial or unexpected change in the applicant’s situation after a disaster that prohibits or severely affects their ability to provide a minimal standard of living or the basic necessities of life, including food, housing, clothing, and transportation. Such instances typically include job loss, business failure, divorce, severe medical illness, and disability. Program staff will evaluate instances of demonstrable hardship on a case-by-case basis after review of the circumstances. The criteria for documenting such hardship may have

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the award cap increased up to the amount required to complete the repair or reconstruction of their property.

Program Estimated Begin and End Dates

The Single Family Reconstruction Program is expected to commence following HUD’s approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

Other Program Details

Deed Restrictions and Restrictive Covenants

Owner-Occupants

To safeguard the CDBG-DR investment in the property, HCD requires a deed restriction or restrictive covenant on properties funded through the program. The deed restriction or restrictive covenant remains in effect for a period of two years following the date of receipt of the certificate of occupancy of the rehabilitated or reconstructed structure. For the length of the deed restriction or restrictive covenant, the property must remain as the primary residence of the owner-occupants to whom the rehabilitation/reconstruction grant was made. Selling the property, using it as a second home, converting it into rental property, or otherwise changing its owner of record will result in non-compliance. Properties will be monitored annually by HCD for compliance with the deed restrictive covenant and failure to comply with the deed restriction or restrictive covenant will result in grant fund recovery. The deed restriction or restrictive covenant may be released on a case-by-case basis by HCD in certain circumstances. The specific language and requirements in the deed restriction or restrictive covenant will be set forth in the program policies and procedures and will be available for applicants participating in the Single Family Reconstruction Program.

Single Family Landlords

Landlords participating in the program will receive a deed restricted unit with an affordability period determined by the amount of subsidy provided. The affordability period increases in step with additional project subsidy, as detailed in the table below.

Affordability Period	Maximum Subsidy
Year 5 (Minimum)	\$367,450
Year 6	\$380,940
Year 7	\$394,430
Year 8	\$407,920
Year 9	\$ 421,410
Year 10	\$434,900

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Year 11	\$ 448,390
Year 12	\$461,880
Year 13	\$475,370
Year 14	\$488,860
Year 15	\$500,000 (Maximum)

Eligible and Ineligible Costs

Eligible Costs include:

- Permitting, design, and planning
- Replacement of damaged or destroyed necessary equipment, such as HVAC units
- Repairs to or replacement of damaged on-site utilities such as water, sewer, electric, and gas
- Repairs to disaster damaged primary structures with standard grade materials
- Reconstruction of the disaster damaged primary structure with standard grade materials
- Upgrades required to meet current building code
- Site work to meet WUI standards
- Handicap accessibility features (if applicable)
- Lead-based paint and asbestos abatement (if applicable)
- Housing Counseling
- Tenant Relocation under the URA

Ineligible Costs include:

- Repair or replacement of auxiliary structures, such as detached garages or carports, storage units, outhouses, or sheds
- Materials greater than standard grade unless required by the local jurisdiction or by state law, such as certain green building requirements
- Partial or incomplete repairs or reconstructions of properties
- Multifamily, condominiums, duplexes, triplexes, fourplexes
- Repair or replacement of luxury or non-critical items, such as swimming pools and security systems
- Repair or replacement of personal property or building contents
- New home purchase
- New construction off-site of the damaged structure (except in the case of a mobile home unit in a mobile home park where the park is permanently closed due to the disaster)
- Forced mortgage payoffs
- Assistance for second homes
- Uniform Relocation

Reimbursement is available for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation of eligible tenants, including the cost of moving to and from temporarily occupied housing and any increase in monthly rent or utility costs at temporary

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housing. These costs will be reviewed for cost reasonableness and initially be paid by the Uniform Relocation vendor procured by HCD.

Housing Counseling

HCD understands the individualized nature of disaster recovery, and the complexities of the recovery process, as well as the necessity to join in that process to provide support and guidance through that process. As such, HCD offers a housing counseling program for disaster impacted individuals to include up to two optional counseling opportunities and one required counseling opportunity to support their housing recovery process.

HCD's Housing Counseling Program provides eligible residents guidance and counseling for their housing needs related to impacts from the 2020 natural disasters, as well as housing needs related to impacts from both the 2017 and 2018 natural disasters. *HCD will include an option for housing counseling for 2021 Single Family Reconstruction program applicants.*

Current homeowners entering into the ReCoverCA housing programs receive counseling services on property maintenance, financial management, disaster recovery funding resources, financial and credit literacy, and other areas as needed and appropriate to assist in helping ReCoverCA program participants determine their housing recovery plan, improve their housing conditions, and meet their financial goals.

Traditionally underserved populations, state and federally protected classes, including racial and ethnic minorities, the elderly, veterans, persons with disabilities, persons with limited English proficiency, and residents of rural areas, face unique disaster recovery housing, and economic challenges.⁸⁴ HCD's ReCoverCA Housing Counseling Program provides expert, unbiased guidance, and information to help families and individuals, particularly the most vulnerable, meet their housing needs through an informed decision-making process.

Resilience Performance Metrics

The Single Family Reconstruction Program will utilize the same resilience performance metrics utilized by the 2020 OOR Program. See description of resilience performance metrics under III.M. Preparedness, Mitigation, and Resiliency.

Program Competitive Application Overview

Not applicable.

Program Method of Distribution Description/Overview

The Single Family Reconstruction Program is delivered at the state level under the guidance of HCD's housing subject matter experts and contract managers, leveraging the 2020 OOR program infrastructure. The 2020 program itself builds on the state's OOR Program for 2017 and 2018 disasters, using its systems and processes to ensure both a rapid startup and iterative improvement. The state utilizes a qualified vendor to perform full scale program management

⁸⁴ For more information on federal and state protected classes, see HCD's 2020 Analysis of Impediments to Fair Housing: <https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>.

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services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

5.8 2021 Single Family Mitigation

FIGURE 170: 2021 SINGLE FAMILY MITIGATION

Grant Number	Proposed Budget	Proposed MID Threshold Budget HUD Identified	Proposed MID Threshold Budget Grantee Identified
B-21-DF-06-0001	\$1,829,700	\$1,829,700	\$1,829,700
B-22-DF-06-0001	\$1,195,100	\$1,195,100	\$1,195,100

Program Description

The 2021 Single Family Mitigation Program is eligible to owner- and renter-occupied properties that did not suffer damage in the DR-4610 event but are in the MID and have residents who are low to moderate income. These property owners are eligible for grants to retrofit their single family unit to meet the WUI code standards to make their homes more resistant to wildfire. Single Family Mitigation applicants applying for rehabilitation to bring their homes up to WUI code standards may receive up to \$50,000 in grant assistance. The program will leverage the existing rehabilitation activities in the 2020 OOR - Mitigation program and project management infrastructure.

Program Tieback to Disaster/Unmet Needs

Program tieback to unmet need is not required by the FRN for utilization of the mitigation set-aside. However, the mitigation set-aside activities must benefit the most impacted and distressed areas (MID) from DR-4610. Projects proposing to utilize mitigation set-aside funds for Single Family Mitigation must be for households located in the MID area (Plumas County).

How Program will Promote Housing for Vulnerable Populations

Affirmative Marketing

The program management consultant will follow HCD’s affirmative marketing procedures for outreach to protected class groups least likely to apply to the OOR Program. Additionally,

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materials will be provided in languages other than English, such as Spanish, to accommodate LEP persons. Language access services for persons who are LEP and the availability of accessible features and reasonable accommodations for persons with disabilities will be provided to applicants through case management.

Prioritization

Single Family Mitigation is open to LMI homeowners or landlords who agree to rent to LMI households located in the MID area.

Program Affordability Period

Not applicable.

Program Definition of Second Home Eligibility

Assistance for second homes as defined by the IRS is not an eligible cost for the Single Family Mitigation Program.

Program National Objective

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR mitigation set aside funded activities must satisfy a national objective. All Single Family Mitigation activities will meet the LMI or Urgent Need objective.

Program Eligibility

Eligible Activity

The use of the mitigation set-aside must ensure that proposed activities are CDBG eligible under title I of the Housing and Community Development Act, or otherwise eligible pursuant to a waiver of alternative requirements in the FRN:

HCDA Section 105(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvement (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).

The eligibility of housing projects is further established in the Consolidated Notice (FRN), 88 FR 6388, which requires HCD to address unmet housing needs with CDBG-DR funds.

Through the FRN, 88 FR 6388, HUD adopts alternative requirements to activities eligible under the Housing and Community Development Act (HCDA) Section 105(a) which allows California to carry out modified activities to comply with the requirements in the FRN to incorporate mitigation measures as a construction standard.

The criteria to meet the FRN requirements for HCD to utilize the mitigation set-aside are described in this section.

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Applicants will be eligible to participate in the Single Family Mitigation Program if they meet the following criteria:

Owner-Occupants

- Homeowner must live in the unit as a primary residence.
- Homeowner must be LMI.
- Home must be located in the MID county.
- Must be current on property taxes or have an approved payment plan or tax exemption.
- The property must have been correctly permitted and permissible for the zoning area or local development standard.
- The property must be a single family dwelling, such as a stick built, modular, or mobile home (i.e., not a condominium, duplex, fourplex, or another multi-owner property).

Landlords

- Tenant must be LMI
- Home must be located in the MID county
- Must be current on property taxes or have an approved payment plan or tax exemption.
- The property must have been correctly permitted and permissible for the zoning area or local development standard.
- The property must be a single family dwelling, such as a stick built, modular, or mobile home (i.e., not a condominium, duplex, fourplex, or another multi-owner property).

HCD will assess applicant eligibility on a case-by-case basis according to the eligibility criteria fully defined in the program policies and procedures.

Program Responsible Entity

HCD will directly operate the Single Family Mitigation Program and will leverage the existing 2020 OOR program and project management infrastructure. OOR is delivered at the state level under the guidance of HCD's housing subject matter experts and contract managers. The 2020 OOR-Mitigation and 2021 Single Family Mitigation Program build on the state's OOR Program for 2017 and 2018 disasters, using its systems and processes to ensure both a rapid startup and iterative improvement. The state utilizes a qualified vendor to perform full scale program management services, including capacity-building for HCD staff, marketing and distribution of the program survey, overseeing intake, completing eligibility and benefit determinations, providing case management through the process, quality control to prevent fraud, waste, and abuse, construction monitoring, and construction management. Applicants are assigned case managers to support them through the recovery process from application to construction and project closeout.

Program Maximum Assistance

Assistance is provided in the form of a grant award to qualifying applicants for the rehabilitation of their home to increase the wildfire resistance of a home through home hardening and vegetation management, including meeting California's WUI code standards. HCD's

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construction management vendor enters into an agreement with the property owner and manages and performs all rehabilitation or reconstruction activities, as well as mitigation activities included within the contract scope of work. The award is provided in increments as construction and mitigation activities are completed. Applicants applying for rehabilitation to bring their homes up to WUI code standards may receive up to \$50,000 in grant assistance.

Hardships: As a standard practice, Single Family Mitigation Program applicants requiring more than the cap on assistance must fund the remainder of their project with private funds or other resources, however, exceptions to the maximum award will be considered on a case-by-case basis. In situations where the applicant has a demonstrable hardship, the specific conditions will be evaluated to determine how best to proceed.

A demonstrable hardship is a substantial or unexpected change in the applicant's situation after a disaster that prohibits or severely affects their ability to provide a minimal standard of living or the basic necessities of life, including food, housing, clothing, and transportation. Such instances typically include job loss, business failure, divorce, severe medical illness, and disability. Program staff will evaluate instances of demonstrable hardship on a case-by-case basis after review of the circumstances. The criteria for documenting such hardship may have the award cap increased up to the amount required to complete the repair or reconstruction of their property.

Program Estimated Begin and End Dates

The Single Family Mitigation Program is expected to commence following HUD's approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

Other Program Details

Reimbursement is available for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation of eligible tenants, including the cost of moving to and from temporarily occupied housing and any increase in monthly rent or utility costs at temporary housing. These costs will be reviewed for cost reasonableness and initially be paid by the Uniform Relocation vendor procured by HCD.

Program Competitive Application Overview

Not applicable.

Program Method of Distribution Description/Overview

HCD will directly operate the Single Family Mitigation Program leveraging the OOM and OOR Program and project management infrastructure. HCD staff will engage impacted homeowners statewide to apply for assistance. HCD will utilize a qualified vendor to perform full scale program management duties to augment HCD capacity and ensure high quality customer service delivery. Program staff will work with the procured vendor to maintain program timeliness, provide oversight, and ensure all levels of the program are compliant.

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Mitigation set-aside activities meet definition of mitigation

Hardening, wildfire retrofitting, of single family units to withstand future disasters meets the definition of mitigation by increasing resilience to future wildfires and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future wildfire events. The [WUI codes](#) identify better construction methods and materials to make buildings more ignition-resistant to wildfire. These standards are based on lab-tested and verifiable performance standards that describe the type a wildfire exposure a building must be able to withstand.

Mitigation set-aside activities address current and future risks

The Single Family Mitigation Program addresses the ubiquitous fire hazard reported across impacted counties by helping homeowners and landlords mitigate risk on their parcels by covering home hardening costs for eligible single family structures. For single family units that did not suffer damage during the 2021 wildfires, eligible applicants can utilize the grant to harden their home to meet WUI code standards to make their homes more resistant to wildfire.

Incorporation of Mitigation Measures

The Single Family Mitigation program will be used to harden existing undamaged homes to wildfire risk, including bringing units into the State of California Chapter 7A WUI Building Code compliance, with a \$50,000 award cap. Chapter 7A of California's Building Code has minimum standards for materials and material assemblies to provide a reasonable level of exterior wildfire exposure protection for buildings in WUI areas.

Construction standards for HCD's housing projects can be referenced online at:
<https://www.hcd.ca.gov/building-standards-hcd>.

Specific code compliance to achieve hazard mitigation, such as WUI codes, are implemented where applicable according to local code and the unique needs of impacted communities. Applying WUI codes to areas within the burn scar but outside of declared WUI areas recognizes that risk maps cannot keep pace with the rapidly changing fire risk. WUI codes are designed to mitigate the risks from wildfire to life and property. The standards within a WUI code vary according to the scope that a community is willing to adopt and enforce.

Eligible activities will be detailed in the programs policies and procedures and will be determined by cost-effectiveness and risk reduction efficacy.

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6. Appendix

6.1 Certifications

The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

The grantee certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its Action Plan.

The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.

The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

The grantee certifies that it is complying with each of the following criteria:

Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

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With respect to activities expected to be assisted with CDBG–DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or

for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.

The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.

The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified

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to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

6.2 Waivers (if applicable)

To date, HCD has not requested any additional waivers outside of the general waivers HUD included in FRN governing the 2020 allocation, 87 FR 6364.

6.3 Summary and Response of Public Comments

2020 Disasters - Summary of Outreach & Public Comment

The following provides a summary of public comments received for the 2020 CDBG- Disaster Recovery Action Plan in response to DR-4558 and DR-4569 during the public comment period of May 6, 2022, through June 6, 2022. HCD received a total of six written comments during the 30 calendar days.

2020 Public Hearing May 19, 2022

The following transcript is from the public hearing held on May 19, 2022, as the required public hearing for the 2020 Action Plan. Questions are from meeting participants and answers are from HCD staff.

Question 1: Has there been any CDBG-DR allocated for the DR-4610 Dixie Fire for Plumas County?

Answer 1: So, yes, HUD has announced \$14.6 million for DR-4610, which covers Plumas County. The meeting we're having today and this action plan and the public comment period is only for DR-4558 and DR-4569. We will, once HUD produces and announces the Federal Register Notice for 4610, we will be coming back through and amending this Action Plan to incorporate that region as well. That is why you don't see information for 4610, here. It's

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important for everyone interested to make sure that you're signed up and are receiving information, once HCD comes to that.

Question 2: Does this mean no funding for Trinity County DR-4558?

Answer 2: So, yes, Trinity County was in the DR-4558. It wasn't identified as the most impacted and distressed area by HUD and so 80 percent of the funding must be spent on the most distressed and impacted areas.

Question 3: For OOR, will national objective be met when home is completed and occupied or is there another threshold?

Answer 3: I can take this one. Hi, everyone. This is Joseph Helo with the OOR program. Yes, when the house is completed, then the national objective is achieved. So, usually the house being complete, and the disaster survivor is rehoused is when the national objective is met.

Answer 4: Yes. Disaster survivors will still be eligible to apply for the OOR program even if received assistance from SBA, FEMA, or both.

Question 5: Are property owners eligible to purchase an RV with OOR if a rebuild is in progress and they cannot afford rent?

Answer 5: Not using program funds. Again, a recreational vehicle (RV) is not eligible for CDBG OOR funds, so the answer is a "no". I'm sorry. Let me take one last look at the question. The answer is "no", not using the CDBG-DR OOR funds, nor can it be used to pay rent.

Question 6: To apply for this program, can a for-profit corporation apply directly or does the for-profit have to apply with a municipality or public agency?

Answer 6: I'm Joe Harney. I'm the program manager for the MHP program. And since this is talking about a corporation and municipality, I assume it's leaning toward the MHP side of things. When the MHP NOFA is out, it will be directly to developer entities, in whichever configuration, and it will not require a municipality or public agency to apply along with the developer.

Question 7: Another question, can a HOA organization apply to repair infrastructure, such as roads and water and waste lines?

Answer 7: The DR programs that we discussed today, there are no eligible programs like that. The housing program, the owner-occupied reconstruction program, the homeowner applies directly through HCD, and we implement. The multifamily developers apply through the competitive NOFA process. The FEMA PA match is only eligible to local cities and jurisdictions because that's a public assistance, so, by definition, only they could receive that funding. There is no program being proposed, here, to assist with those infrastructure needs. We recognize infrastructure is a big need. In discussion with other state agencies, there are a plethora of funding available either through state water resources agencies, regional water quality control board, and other infrastructure resources as well. We encourage folks to look at those resources.

Question 8: Why is Mendocino not considered most impacted and distressed (MID)?

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Answer 8: The methodology [used] by HUD identifies what the most impacted and distressed (MID) [areas] are and the methodology includes significant damage either as a portion of the economy or a significant portion of the housing units lost. So, Mendocino had a smaller portion of housing units lost as compared to other counties in DR-4558 and 4569.

Question 9: Does the OOR program require a contractor to rebuild or is owner-builder allowable?

allowable?

Answer 9: For the 2020, the OOR program will only offer the solution one path of the program, which means that all construction will be completed by the program construction services vendor, so there will not be an option for program participants to use an outside contractor.

Question 10: Is there an approximate date for issuing the Santa Cruz NOFA?

Answer 10: There is not yet. The Action Plan is still in the draft public comment period, and it will need to be resolved and finalized and approved by HUD, before we can begin putting together the NOFA timeline.

Question 11: Will there be a baseline requirement for readiness for MFH projects?

Answer 11: So, at this point, this is yet to be determined. There will be discussions about the scoring criteria. Traditionally, readiness is a factor that is used in determining project competitiveness, so it is likely that there will be some sort of points awarded for readiness, but at this point it has not determined how many or what percentage of the overall total score will constitute readiness.

Question 12: Can OOR funds be leveraged with other loan funds, if someone is not eligible for a loan that will cover the whole rebuild? For instance, a project costs \$600k, but the person can get a loan for \$300k. Will OOR kick in at \$300k?

Answer 12: Yes, you can get loans to complete the total cost of the build. One thing to note is the cap of OOR is \$500,000, so, you know, apply to assess how much you qualify for, before applying for a loan. This way, you can minimize the amount of money you need to borrow.

Before we go on to the next question, let's discuss duplication of benefits, because your line of questioning is triggering this really key Stafford Act requirement: duplication of benefit. Can we explain what it is and how it gets accounted for in the OOR process?

Duplication of Benefits simply says that the OOR funds cannot duplicate another assistance for the same purpose. Simply put, if you have damage for \$100, you cannot receive \$100 from FEMA, plus \$100 from SBA, plus \$100 from insurance for the same damage. So, basically, if you are receiving a loan, if the damage is \$600,000 – taking the example that was on the question – and you have a loan for \$300,000, then you do have a remaining need of \$300,000. Then, OOR can come in and bridge that gap. The purpose of the OOR fund is to be gap funds, so, basically, after exhausting all assistance provided from your insurance, from FEMA, from SBA loan, if you choose to apply for SBA, then the OOR funds can come in. Funds from the OOR cannot duplicate or pay for damage that you have already received assistance for.

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Just as a reminder to everyone, this is a federal Stafford Act requirement that applies to all disaster recovery funding. It's a key process for any advocates on the call. This duplication of benefits issue is a serious issue. We have to account for it at the beginning of the process and also at the end of the process, as well, accounting for any of these private or public resources brought in for housing needs.

Question 13: What is the address, again, to receive notices from the CDBG-DR?

Answer 13: So, you actually have to sign up to receive the HCD email. And it is on our [HCD] website. And you go on the top tab, and you click on "contact" on the right-hand side. Then, click on "email sign up" on the right-hand side to receive our e-mail and you have to fill in your information to receive the email. I will email the slides to everybody, so if you're not able to do that, you can do that when you receive the slides. I will e-mail the slides tomorrow.

CDBG-DR website: <https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/grant-management-resources/index.shtml>

Question 14: What if a homeowner has already started/completed the rebuild? Would they be able to offset any loans?

Answer 14: I assume that is for the OOR. That would be reimbursement and the OOR does not offer reimbursement. There's no reimbursement path at this point. So, it is remaining need, so the repairs are still needed. And that's when OOR funds can come in to, basically, reconstruct the damaged property.

Question 15: Can the individual choose their own contractor?

Answer 15: For the 2020 [OOR] program, there will only be the solution one path, and that is where the program construction management vendor will take care of all the construction, so the participants cannot hire their own contractor. There will only be the state or program construction management vendor to carry out construction activities.

Question 16: What would happen if the property owner is also the builder?

Answer 16: Again, the construction can only be completed by the construction management vendor who is a part of the CDBG-DR RecoverCA OOR program.

Question 17: What are loan terms for an OOR loan?

Answer 17: The OOR funds are in the form of a grant. It is not a loan.

Question 18: When will the MHP NOFA most likely be released?

Answer 18: At this time, the release date is not yet determined. That will all depend on what feedback is received in the public comments and our final approval and authorization from HUD to proceed with the Action Plan.

The critical date, right now, for HUD approval and execution of the grant agreement, so these programs that we've been talking about, basically, become real because, until HUD approves these programs, basically, don't exist. We anticipate that to be in September or October. It's some window period, after that.

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Question 19: Is there a size cap on the home size [for OOR]?

Answer 19: The program currently does not have a size cap. There is a match methodology that the program takes. Once you complete an application and once your site is visited by our team, then you would go through the method of assigning one of the pre-approved models that the OOR program has to build. So, we have pre-set plans and, basically, there is a match methodology that the program has. So, according to your previous bedroom/bath count, your house size, and the need, the applicant will be assigned one of the pre-approved plans for the OOR program.

Question 20: How will the construction management vendor be selected, by bid?

Answer 20: One of our approaches is to expedite getting resources into communities, so, as we mention in our Action Plan, we're proposing to expand existing programs and not go through a full rebid process. This will allow us to get resources into communities sooner because we already have vendors both on the application part and the construction management part already on board and working on construction. Many of the communities surrounding, [are] also, overlapping with the DR-4558 and DR-4569.

Question 21: If you lost your home on 8/18/2020, and are trying to rebuild, and already have a contract with a builder, and are underinsured, and are facing mitigation costs, etc., can OOR help with mitigation?

Answer 21: One of the new features with this grant is the OOR mitigation where you can apply for up to \$50,000 to help with [the] mitigation and resiliency of your project. If the scenario is that you will want to continue using your own contractor, you can't apply for OOR to help with the reconstruction of the house; you need to go forward with the contractor that you've chosen. But you can potentially apply and receive up to \$50,000. Again, you would have to be in the priority tiers, be in low- or moderate-income in the most impacted and distressed areas. And we have yet to provide the details of that program, but that could be an eligible activity.

Question 22: Will the models be shared for OOR?

Answer 22: Not sure what the direction is on that, so we'll take that back and respond in writing. [HCD note: models will be provided during the application period].

Question 23: Does the OOR grant have any owner-occupied restrictions for 'X' amount of years?

Answer 23: Yes, the program will have a monitoring period for a minimum of two years, where the property needs to be maintained as owned and occupied by the survivor who received the grant, with additional requirements as well.

[There is] some additional guidance from HUD for increasing the period for new construction of single family homes.

Question 24: Will the models be shared with non-applicants?

Answer 24: We'll take this one back and we'll respond in writing. [HCD note: models will only be shared with OOR program applicants]

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Question 25: Will the survivors choose from models for the OOR program or be able to use their own floor plans? What if a survivor is in the process of building with a contractor?

Answer 25: The design of the OOR program that we already have in place and, again, possibly implementing the 2020 program has the pre-set plans that are already a part of the program. So, if the survivor has their own plan and [is] already working with a contractor, again, the 2020 program only allows for the path where the construction contractor that is a part of the program will carry out construction activities.

Question 26: If your area has problems with road access that prevent the fire safety sign off for pre-clearance in order to get housing permits, can, for example, 4 property owners combine mitigation funds in order to solve the road access issues (equaling \$200,000 in this hypothetical question)?

Answer 26: This is a bit difficult. First, [I'm] not sure if this would qualify as a mitigation activity. We are going to take our marching orders from state experts, office of state fire marshals, and others. Assuming that the activity you want to do, which is road access, is considered mitigation or resilience, for those four property owners to work together there is a very low likelihood everyone would be in the same priority tier. A lot of things would have to line up for this kind of situation to become a possibility. The other issue, here, that I have concerns with is this road access. Again, there's going to be issues about public access, right of way, site ownership, so this would be a "very-highly-unlikely-to-no" answer.

Question 27: Can you share the new guidance on number of years for new units using OOR funds, if not 2 years? [HCD clarification: this question is referring to the monitoring period of the OOR program, which is two years].

Answer 27: We're going to check with that and definitely get back to you. [HCD note: the OOR program monitoring period is two years].

Question 28: Is there anything in place that will prevent an individual from selling the property after the rebuild is complete?

Answer 28: No, not prevent, but there will be financial consequences – that may include repayment of grant funds. So, there will be a deed restriction or a restrictive covenant against [the] title, but it will not prevent [the] homeowner doing what they choose with their property, but may entail financial consequences that include recapture or repayment of grant funds.

Question 29: I don't understand how this is helpful for people that are in the middle of rebuilding. We can't fire our current contractor and start all over again.

Question 29: I don't understand how this is helpful for people that are in the middle of rebuilding. We can't fire our current contractor and start all over again.

Question 30: Can I see the plans somewhere? Are the plans that you have available to look at somewhere? (Clarification from HCD: This is for the OOR program. Do we (HCD) have examples on our website from 2017 or 2018?)

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Answer 30: Not on the website. Again, the 2017 and 2018 OOR programs have plans, so we're not sure how the 2020 plans will look, but not posted. [HCD note – plans will be provided no later than the time of application].

Question 31: I am one of those people that has not yet hired a contractor. I am just getting my hazard trees removed, at this point, and I'm grossly underinsured, so I'm hoping I can qualify for this.

Q: Yes, that's what I would be interested in seeing. And, of course, then, seeing if I qualify or whatever.

A: Yes, that is the more difficult question, over here. Let us look into this and figure out how we can provide this information. I think others might have the same issue as well.

Q: And me signing up for the meeting, I will get the e-mails, or I go on the website to get the e-mails?

A: I can assist you with that. I will email you tomorrow and walk you through that. You can give me a call also.

Question 32: Many people that will be eligible for this OOR program have given up and left the area.

Answer 32: We fully recognize disaster recovery takes a long time and is very difficult: requires a lot of difficult discussions at the programmatic level and also at the individual level. These funds are only going to be able to provide a portion of the recovery funds in communities.

Question 33: Will HCD be doing case management or long-term help while a rebuild is complete? Or have contact with the individual after the rebuild is complete?

Answer 33: Case management could be different. As far as the OOR program interaction, we do have a case management team that works with the case management. And, yes, after the rebuild it complete, there is a monitoring period and the program will be in contact with the survivor, after the rebuild is complete.

Similarly, on the MHP portion, there will be long term monitoring and compliance with annual reporting requirement necessary to ensure that the project remains in compliance in meeting the national objective, during the entire affordability period.

Question 34: How long is the monitoring period?

Answer 34: We're going to get back on the OOR monitoring and multifamily is for 55 years.

Question 35: I was the person who asked the question about combining mitigation funds and I thought maybe if I explained a little better. There are roughly 50 homes that were lost in the Siskiyou fire that are all accessed along one private road, and on that private road, so far CalFire has not been able to sign off on our fire safety access, so pretty much all of those fifty property owners are cut off from accessing services or programs like this one, which is unfortunate. The vast majority of people are elderly or low income and would easily qualify in terms of the income qualification, so it is likely that the majority of people would be in the lowest tier or the middle tier, income-wise, and could qualify. And I'm just thinking if they could pool

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their mitigation funds, then they might be able to solve the road access issues and then that way people could move forward with getting their housing permits. Do you still think that would not be possible or would be unlikely?

Answer 35: I think one of the challenges we're going to face is that the road construction and reconstruction and increase would have to happen prior to an application going to OOR or even MHP because the infrastructure must be in place before application, so the timing would be extraordinarily difficult to have it as part of the rebuild process. Because without the roads to service, the housing can't go in.

Q: Maybe I can explain a little better. We have a very, very good road. It's been accessed by all of the large trucks that came in to do the debris removal. It's a very serviceable road; it just doesn't meet the requirements for CalFIRE to pass pre-clearance, so the road is in place and has been there for decades and is actually quite a good road. Are you talking about logistically just not being able to get access on a road?

A: No, I think the reason we are hesitating on this one, a little bit, is we have to consult and make sure that we're aligned with what CalFire is working on, as well. We have your information. We can follow up. We do need to round up with CalFIRE to be able to provide you with a more concrete answer. We can follow up with you.

(follow-up statement from public commenter) They're [CalFIRE] having a public meeting Monday night and that's why I wanted more concrete information from you so I could bring it to that meeting.

Question 36: Do OOR funds help with landscaping or fencing, driveway, garage, or only a house?

Answer 36: The OOR funds are intended to rebuild the structure, so if the garage is attached, then, yes, it will be included. Detached garages will not. OOR funds will not cover landscaping; maybe some landscaping if it's required by code to get a building permit then it may be covered. Fencing, I believe, will be included. A driveway, yes, program funds will ensure that you have access to the property, so a driveway, if needed, should be covered by program funds. These will all end up being specific to cases, after the initial site visit and determining what is needed to receive a permit and rebuild the house.

Building on some of the OOR questions we've had, once this action plan is approved by HUD and we execute a grant agreement, then the OOR team will be coming around, providing outreach, explaining to folks where the website is, what kind of documentation you need, how to complete a survey is to get placed in our priority tiers, and how you can move through an application. All of that good work is coming. We really appreciate these questions. Some of the property information will not be answerable until we get to program implementation.

Question 37: About how long from application to approval?

Answer 37: Past experience of 17 and 18 has been it's been a very case-by-case basis for the OOR program, as well as the MHP program.

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Just a reminder that we will have the same meeting tomorrow at the same time in Spanish, so, if you know anyone who needs to attend that meeting, please send them to the HCD website link and the registration is on our website, or you can contact me for information.

Question 38: When will you start accepting applications?

Answer 38: That is an unknown at this time. HUD must review and approve this Action Plan that we are in the middle of the comment period for. Execute the grant agreement: that's projected sometime in September or October, so the earliest the program would run would be some weeks after that. We do intend to operationalize an existing program, so we don't think it will be very long period of time, but it's going to take some time to ramp up.

Similarly, there will be a development window for the MHP program to make sure that the notice of funding applicability is meeting all program, state, and federal requirements, as part of that finalization and implementation.

Question 39: September 2022—This is when all of our insurance runs out.

Answer 39: HCD recognizes insurance and insurance caps are a significant barrier. We're engaged in non-CDBG-DR activities with the Department of Insurance [and] the Office of State Fire Marshall on this issue as well so we are aware of it. It is a significant issue.

Close out: You can also submit your questions at disasterrecovery@hcd.ca.gov. You can contact me directly. We will have the same meeting in Spanish and the public comment period will last until June 6th. If we don't have any other questions, we will end the meeting now.

Thank you, everyone. Thank you. We'll end the meeting now.

2020 Written Public Comments

The following questions were received in writing by HCD staff during the required 30-day public comment period for the 2020 Action Plan.

a. Public Comment - Received 6/6/2022

Greetings -

Napa Valley Community Organizations Active in Disaster provides the leadership for Napa Valley's Long Term Recovery group supporting 2020 wildfire survivors from the two wildfires - DR-4558 and DR-4569. Napa County was declared for both fires by FEMA for individual and public assistance. Napa County is a most distressed and impacted area.

Our main concern as a long term recovery group is around eligibility requirements. These fires occurred during the height of the pandemic shut downs and non-congregate sheltering was used for evacuees. This greatly impacted the ability to get information to evacuees and survivors. With impacted households dispersed across several counties and concerns about going to the evacuation center, the complications of getting information to people who were not digitally connected was exceptionally difficult. Many did not even know where or how to check in regarding resources. The delay in declaring DR-4569 by weeks meant many who had visited the Local Assistance Center right after the fires, did not come back when FEMA was finally there for registration. While the same number of households and single family dwellings were

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impacted as in the DR-4558 (around 2400), only a third of the households (a little over 800) registered for FEMA for DR-4569. Unfortunately, we were not able to reach many households to guide them through the SBA loan application. Additionally, the delay in Disaster Case Management contracts from FEMA (it was 10-12 months) to local agencies further exacerbated the ability to reach and inform impacted households.

As a result, we respectfully ask that these complicating factors be considered when applying eligibility requirements.

- Limiting the eligibility to only those who completed the FEMA registration process including the SBA loan application, will mean that some of our most needy and impacted households with limited resources will not be able to benefit.

- Further excluding those who received a FEMA benefit, but use the benefits for other recovery needs and not rebuilding will again mean many of our most needy households will not benefit. Recovery needs were substantial and waiting for two plus years for the other grant funding to become available is a stretch for those with already limited resources.

Within Napa County, we are working to see how we can locally expedite the disaster case management process and get critical information to survivors sooner. I think COVID restrictions at the time greatly complicated and impacted the ability to fully serve fire survivors and impacted households. We would appreciate it, if the eligibility requirements could be more inclusive of the extenuating circumstances caused by the pandemic for the 2020 wildfires.

Thank you for your consideration and the opportunity to share our concerns.

HCD Response: Thank you for your comment. HCD understands the difficulty of cascading disasters, including the pandemic and wildfires that have impacted Napa County. The ReCoverCA owner occupied rehabilitation and reconstruction program does not require potential applicants to register for FEMA Individual Assistance or an SBA home loan. HCD will issue the 2020 ReCoverCA program guidelines upon approval of the 2020 Action Plan that will outline the full requirements of the program, but they will closely follow the current ReCoverCA program guidelines for the 2017 disasters available on HCD's website: <https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/docs/english-oor-v2-0-pnpsfinal-2-9.pdf>

b. Public Comment - Received 6/3/22

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State Council on Developmental Disabilities

• website • www.scdd.ca.gov

• email • council@scdd.ca.gov



STATE OF CALIFORNIA
Gavin Newsom, Governor

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June 6, 2022

California Department of Housing and Community Development

Subject: Community Development Block Grant Action Plan 2020 Public Comment

To Whom It May Concern:

Thank you for the opportunity to review and comment on the Community Development Grant Action Plan for 2020 wildfires affecting northern Californians. As climate change continues to wreak havoc on our communities in seemingly endless natural disasters, actions such as in this Plan are vital to help make communities whole from the devastation of wildfires in 2020, and to mitigate the damage of future natural disasters throughout California.

As the Plan clearly states throughout, fires and other disasters can disproportionately impact Black, Indigenous and People of Color, vulnerable populations, and federally protected classes, including people with disabilities. As we are only beginning to see, the effects of these wildfires can last years after the event. The State Council on Developmental Disabilities (SCDD) commends the commitment Congress made in this funding program, and the Department's efforts in this important work repairing the damage of fires in 2020 and preparing for future events.

Specifically, the Action Plan highlights the disproportionate impact disasters may have on Californians with disabilities and their families. As the Plan states:

People with disabilities are disproportionately impacted by disasters, as disruptions in support systems and medical care exacerbate challenges people reckon with as part of regular life. Due to impaired or limited physical or cognitive abilities, individuals may be unable to evacuate safely or easily, create or maintain a preparedness plan, advocate fully for their needs, or seek out necessary care while displaced. After disasters, people with disabilities face significant barriers in finding and securing appropriate housing, transportation, employment, physical and mental health services, and other supports critical to long-term recovery.

This, of course, is true, and the disproportionate effect is a problem that the Department, Community Based Organizations, state and local agencies, members of the community, and other stakeholders must tackle together. The Plan, however only states this problem and the bare minimum requirement of federal law:

"The Council advocates, promotes & implements policies and practices that achieve self-determination, independence, productivity & inclusion in all aspects of community life for Californians with developmental disabilities and their families."

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All CDBG-DR programs have an obligation to comply with relevant federal laws that prohibit discrimination on the basis of disability and to require physical accessibility and the provision/allowance of reasonable accommodations and reasonable modifications, including the federal Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act." (page 41.)


There is little mention, if any, what exactly the Action Plan will do to address this issue beyond not engaging in illegal discrimination. Though it is of course important to be in compliance with the ADA and Rehabilitation Act, we can and must do more.

Over the past three years, SCDD and several other agencies representing members with disabilities and access and functional needs have held dozens of working group sessions with the various state utility companies regarding response and mitigation for our stakeholders in the event of a natural disaster. It has become clear that much more work needs to be done – the greatest challenge is that without direct communication with the people directly impacted, at the grass roots level, even the most well-wishing programs will inevitably fail short of their stated goals for those members. The same disproportionate impact that leads to more severe negative outcomes for those with disabilities leads to a gap in education and communication directly with those that best know what they need to survive another fire in the situations unique to them.

SCDD challenges the Department to think about this disproportionate impact beyond the mere federal statutory requirements for discrimination, and put the individual needs of those directly impacted at the forefront of thought, so that this generous program may actually put the funds to a use in a way that actually helps those most directly impacted by this devastation.

California has the opportunity to lead the nation in this moment, as climate change will continue to lead to disasters nation-wide that disproportionately impact those with disabilities. The State Council on Developmental Disabilities remains available to work with our partners and the Department of Housing and Community Development to meet this moment. As this program begins SCDD looks forward to working with the Department and all our partners to make sure this we are more equipped and engaged directly with people with disabilities to find out what gaps exist that we can fix with this new Action Plan.

Sincerely yours,



Aaron Carruthers

HCD Response: Thank you for your comment. HCD welcomes additional opportunities to expand its outreach and consultation efforts. The Department's consultations and outreach efforts to date for the development of the Action Plan are outlined in the Outreach and Engagement section. However, consultations for the Action Plan are only the first step in program outreach and working with those directly impacted by disasters including those with disabilities. HCD staff looks forward to partnering with the State Council on Developmental

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Disabilities and its partners to ensure HCD's disaster recovery programs further understand the recovery needs of persons with disabilities.

Public Comment - Received 6/1/22

Question: Just wanting to find some information on how a single person can apply for the funds...my rental home burned down in the glass fire and I attended a CDBG-DR zoom where I asked if I was able to apply with out using an agency or non profit and was told yes so I'm wondering what the timeline is and how do I go about applying... to use the funds for down payment assistance?

HCD Response: Thank you for your comment. At this time, the HBA Program is still under design and review by HUD and HCD and is not open for applications. Upon approval of the 2020 Action Plan, HCD will issue guidance on the application process and eligibility for owner occupied housing recovery programs including the HBA program.

d. Public Comment - Received 6/2/22

Please consider providing funding for those impacted by the 2020 wildfires in Trinity County (DR-4558).

Trinity County has a significant proportion of low income, older adults and adults with disabilities and/or those on a fixed income, uninsured/underinsured.

Trinity County has a need for fuels reduction and forest management, particularly in the national forests. General fuels reduction efforts, shaded fuel break construction and maintenance, and stand and plantation thinning. Projects are identified in the Community Wildfire Protection Plan. Funding is needed to support landowners to treat their own fuels and for neighborhood groups to work together to reduce fire hazard and emergency response problems in communities. Fuel breaks along ridges and roadsides for creating a more fire-safe community. Connecting private roads to allow for more than one egress.

Some of those looking to rebuild lack the financial means to rebuild, access to contractors is a barrier, as well as challenges related to permitting.

Trinity County has little in the way of high-density multiple unit dwellings, which is a focus for 2020 CDBG-DR. The 2020 Action Plan should also take rural, remote county needs into consideration, and consider need for assistance for single family residence rebuilds.

Forest management on USFS/National Forest lands, defensible space projects to clear vegetation on private parcels and lease lots, including USFS lease lots.

Some of those impacted do not qualify for rebuild assistance due to ownership issues or renter status.

Impact of the community and economy as a result of the loss of secondary homes, rental properties,

The Action Plan should include efforts to inform those impacted of other grants and funding sources available to address disaster relief, long-term recovery, restoration of infrastructure and housing, and hazard mitigation.

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Consider exemptions to labor requirements for non-profits that present barriers to

Provide workarounds to address the disqualifying factors for rural nonprofits to overcome the labor requirements, or provide guidance to identify alternative resources so that nonprofits can qualify.

HCD Response: Thank you for your comment. Unfortunately, due to the limited amount of funding made available by the 2020 disaster appropriation, HCD is limiting 2020 CDBG-DR funding to counties identified as Most Impacted and Distressed Areas by the Department of Housing and Urban Development. HCD may consider expanding eligible areas for the 2020 CDBG-DR funding if more funding becomes available. HCD encourages jurisdictions not eligible for CDBG-DR funding to contact HCD staff to learn more about other HCD and state resources that may assist their recover efforts. For further details please contact:

DisasterRecovery@hcd.ca.gov

e. Public Comment - Received 6/6/22

On behalf of Yolo County, I submit the following public comment in response to the 2020 CDBG-DR Draft Action Plan:

Like a number of other California counties, Yolo County was significantly impacted by the 2020 wildfire disasters. However, as Yolo County's losses were primarily agricultural as opposed to housing units, Yolo County was not considered qualified for federal recovery programs despite the heavy impact on Yolo County residents. For the LNU Fire, Yolo County had to petition for three months to access state recovery programs and does not have access to any federal programs. In 7 of the last 9 years, Yolo County has experienced Type 1 Fires on the county's western border but has not been included in federal recovery programs for any of these fires regardless of the impact on Yolo County. According to the [5th National Risk Assessment: Fueling the Flames \[firststreet.org\]](#) published by the First Street Foundation, Yolo County has the fourth greatest relative growing risk of wildfire of California's counties. Yolo County's wildfire risk is persistent and growing, and the county urges two courses of action:

First, Yolo County respectfully requests that some portion of the funds allocated to California for 2020 CDBG-DR be set aside for counties like Yolo that were impacted by the 2020 wildfire disasters but did not meet the current federal requirements to be considered "most impacted and distressed".

Second, Yolo County urges review and update of requirements for being included in federal recovery programs so that small and underserved counties (like Yolo) can receive much-needed assistance to help our population recover from emergencies/disasters. Guidelines that focus heavily on residential dollar losses will inherently disadvantage lower income and rural populations.

HCD Response: Thank you for the question. HCD acknowledges the challenges with accessing federal disaster recovery funding and is working with HUD to urge much needed changes to the formula for federal disaster recovery resources to be more in line with California's rural counties. Unfortunately, due to the limited amount of funding made available by the 2020 disaster appropriation, HCD is limiting 2020 CDBG-DR funding to counties identified as Most Impacted and Distressed Areas by the Department of Housing and Urban Development. HCD may

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consider expanding eligible areas for the 2020 CDBG-DR funding if more funding becomes available. HCD encourages jurisdictions not eligible for CDBG-DR funding to contact HCD staff to learn more about other HCD and state resources that may assist their recover efforts. For further details please contact: DisasterRecovery@hcd.ca.gov

f. Public Meeting - 5/19/22

The following questions were posed during the 2020 disaster recovery public meeting held on May 19, 2022. During the webinar staff noted a need to conduct follow up research to answer the questions posed during the open public comment.

Question 1:

Will the models [for homes] be shared for OOR?

Will the models be shared with non-applicants?

HCD Response: Thank you for the question. HCD currently shares floor plans and designs during the application period of the OOR program, this practice will continue for the 2020 funding.

Question 2: Can you share the new guidance on number of years for new units using OOR funds, if not 2 years?

HCD Response: Thank you for the question. The compliance period for applications that receive funding for the OOR program is two years. For further details on the OOR program and compliance requirements, visit the OOR policies and procedures on HCD's website: <https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/docs/english-oor-v2-0-pnpsfinal-2-9.pdf>

Question 3: How long is the monitoring period? [for the OOR program]

HCD Response: The monitoring period for homes that receive OOR funding is two years. The following excerpt is from the OOR policies and procedures, for additional details visit: <https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/docs/english-oor-v2-0-pnpsfinal-2-9.pdf>

The 24-month deed restriction is monitored annually by the Program and/or HCD staff. The compliance and monitoring policy include the following percentages of grant repayment, if the applicant is not determined compliant within the 24-month compliance period:

If within the first 12 months monitoring period, applicants fail to comply with the compliance requirements, the applicant is responsible for repaying the total grant amount back to HCD.

If within 13-24 months monitoring period, applicants fail to comply with the compliance requirements, the applicant is responsible for repaying fifty percent (50%) of the total grant amount back to HCD.

If the applicant is in compliance, at or on the beginning of the 25th month of the compliance and monitoring period, the deed restriction, i.e., lien on the property, is released and the total grant amount is forgiven.

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Stakeholder Consultation Notes

The following summaries represent notes from two stakeholder meetings held for Tribal Governments impacted by the 2020 disasters, and affordable housing developers.

2020 Tribal Governments - 6/2/22

1. Question / Comment: When is the last day that tribal governments can provide comment? And when is the NOFA expected to come out?

Response: The DRAFT CDBG-DR Action Plan for 2020 qualifying disasters will be available for public comment from May 6, 2022 until June 6, 2022, but HCD is committed to ongoing dialogue with tribal governments about proposed programs. HCD must get to grant agreement execution with HUD in September or October of 2022, so the NOFA is projected for the middle of 2023. Between now and then, there will be meetings with interested developers and entities to discuss programs and policies in detail, including thresholds, scoring, etc.

2. Question / Comment: Are floods covered in this plan?

Response: For disaster recovery funding for 2020, activities and eligibility are tied to DR-4558 and DR-4569, so there has to be a tie to those wildfires. Flooding is not covered by disaster recovery funding for 2020. However, the mitigation component is detached from that restriction. Mitigation dollars can be used for whatever hazards affect an area, including seismic, flooding, or geologic hazards.

3. Question / Comment: This program is new for a lot of tribes and tribal governments and distinguishing between eligible and ineligible activities and applicants can be challenging. Tribes had similar issues with understanding the Super NOFA. Can HCD provide some kind of summary document that clearly defines program types, simplifies eligibility, and groups activities into buckets?

Response: We don't currently have anything like this, but we would like to collaborate with Tribal Affairs to develop a summary cheat sheet for the 2020 Action Plan that can be distributed among tribal governments.

4. Question / Comment: With AB 1010 only having passed a few years ago, awareness among the tribes about state programs in general is still at a trickle. It would be extremely helpful if we could collaborate to develop a strategy and some materials to help educate tribes on the various state programs and resources, in addition to the Action Plan. CCRH already provides education and technical assistance to tribal communities and could assist with continued capacity building.

Response: HCD Disaster Recovery team will meet with Tribal Affairs to develop a summary one-pager cheat sheet for the 2020 Action Plan and will schedule a follow-up meeting to discuss.

5. Question / Comment: Will the MHP Program require applicant entities to front pre-development costs?

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Response: The MHP NOFA process puts those pre-development costs on the developer, which is similar to other state and federal programs. In this case, a tribe would not be the lead entity on an application, but would be supporting the developer and ensuring that approvals are in place to allow the project access to the land and infrastructure necessary to construct a multifamily project.

6. Question / Comment: Wouldn't it be an issue if a developer has to partner with a tribal government on a project in which the tribe would own that project? We've seen this issue with the Super NOFA as well, where it's difficult to find developers who want to partner with tribes because the developer wouldn't own the property. At the same time, tribes don't have money to cover costs up front, so they can't lead an application process as a developer.

Answer: In the past, pre-development costs have not been eligible for CDBG-DR dollars. We are unclear on eligibility requirements for 2020 and 2021 disasters, so HCD will have to get clarity with HUD and report back.

7. Question / Comment: How will HCD address any thresholds or requirements that may present obstacles specific to tribal governments?

Response: HCD has not determined the specific or final thresholds and minimum requirements for eligibility for these programs yet. We want to ensure that applying for these programs is as seamless as possible. For programs like these that are leveraging other state dollars, we must ensure that the eligibility criteria and other policies are in alignment across the board, and that all of those policies integrate the changes made since AB1010 was passed. We will continuously revisit this topic and revise programs accordingly to make sure that tribes are not disadvantaged in scoring or any other process. CCRH will be included in any stakeholder conversations or meetings held to discuss the NOFA process.

8. Question / Comment: CCRH wants to do more focused outreach to tribal housing partners to determine how program thresholds, requirements, and processes impact a tribal government or housing authority differently than they would a non-tribal community housing developer. For instance: how can programs work for tribes without trust land and must compete with the market to acquire a project site? How does this work for tribes without federal recognition?

Response: The goal of this program is to meet the National Objective of providing additional low and moderate income housing units to the housing stock of a community, and there is a lot of flexibility on how to get to that goal and the creation of those units. One example is a ground lease righter, where a jurisdiction leases surplus land to a developer for 99 years. The jurisdiction maintains ownership of the land and the developer owns and operates the building.

9. Question / Comment: Can a tribe apply as the developer for an MHP project?

Response: Yes, tribes can apply as developers under the MHP program NOFA.

10. Question / Comment: Can tribes apply to build the project on tribal lands/trust lands, or does it have to be on fee lands regulated by the state?

Response: Projects on trust lands will likely be eligible. DR 17 and 18 programs included ground lease righters, where a jurisdiction leases surplus land to a developer for 99 years. The jurisdiction maintains ownership of the land and the developer owns and operates the building.

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That partnership model could be adapted to a project on tribal trust land. HCD will make sure that this option is integrated into early program development. In earlier programs, a tribe and development partner used the ground lease righters model to successfully apply for award. Partnerships between developers and non-profit developer partners help navigate the landscape, and allows the project to cobble together various funding sources. This is critical is crucial to using CDBG-DR funds for a project, as DR funding cannot be used as the sole funding source for any project. For the 2020 MHP program, only up to 40% of the total development cost can be covered by an MHP award, so 60% of the project cost would have to come from elsewhere.

11. Question / Comment: Is there a requirement that tribal applicants would have to agree a waiver of sovereign immunity to apply for or accept an award?

Response: For most HCD programs there is a limited waiver of tribal sovereign immunity that could apply. But there have been some instances, depending on the style of the program, where there may be other ways to accomplish that (example: reimbursement programs). HCD and the development team would have to go through that process once an award was granted. The limited waiver is limited to only the scope of the project and would not be the full waiver, but HCD fully understands that the tribal governments determine their own processes for addressing those waivers, so we work through any potential roadblocks on the front end (during application process or immediately post-award) to find the best path forward.

12. Question / Comment: Are there any examples of projects that have been awarded to tribal governments or are in process?

Response: Yes. A full list of tribal awards can be found on the website. Tribal governments have successfully applied for funding for public service projects and housing development projects through state programs, and the last round of the MHP awarded a development team comprised of a tribal government and regional non-profit housing developer.

2020 Affordable Housing Developers - 6/2/22

Question 1: What is the expected timeline for NOFAs in the six regions?

Answer 1: We are projecting the expected timeline to getting this Action Plan approved and the grant agreement executed to be September or October of this year. After that, probably in the middle of next calendar year for the NOFA. We hope sooner, but that is the estimate.

We also have to work with the stateside funding partners to make sure any NOFA we release lines up with additional funding resources for the reconstruction process to better leverage disaster recovery dollars with other public funds.

Question 2: How will HCD ensure that the local jurisdictions that the funding is intended for will meet their local needs if they are not being allowed to review the projects?

Answer 2: The multifamily allocation was made by looking at the population of impacted survivors. The majority were renters and therefore, the funds were allocated proportionately based on the number from that analysis. The issue with CDBG-DR is not having enough resources – we have \$1 billion in needs but only \$200 million so CDBG-DR is going to be a small slice of recovery funds for any community. This funding is for new rental construction in

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these regional set-asides and should lead to less competition, especially in less competitive areas with other funding programs. This funding is proportional to FEMA IA registration and is to build needed affordable rental units in communities.

Question 3: Recommend OOR not be limited to single family, because there are multifamily income qualified owners impacted as well. Why is it single family only?

Answer 3: As far as we know for 2020, there were no deed restricted properties that were destroyed. The appropriation was based on owners who registered with FEMA IA. We are providing funding for new affordable multifamily and the single family homes that were lost.

The FEMA data does not include losses that are insured or insurable so a deed restricted property may have been lost but would have also been insured and not included in the allocation. Insurance gaps are intended to be covered by SBA loans or other FEMA funds.

Question 4: To confirm, will developers be able to apply to the NOFA directly? Or will they need to partner with localities?

Answer 4: The NOFA, at this time, is a direct application from developers. We recommend that developers work closely with local municipalities and develop a working relationship as part of the building permit approval process. There is no requirement, however, that the local municipality be a partner on the application at this time.

Question 5: Please comment on need to target “most disadvantaged: indigenous, people of color, vulnerable., etc.”

Answer 5: Ask for clarification.

Q: In the document to sign up for this zoom call, there was a section that stated the goal is to target most disadvantaged... that group of people.

So that speaks to the fact that with these limited resources, we are creating programs with the intent of providing resources for disadvantaged community members, BIPOC, indigenous folks. We know tribes were impacted by the 2020 wildfires, so we have been working directly with them as well. We are clarifying the way that HCD is prioritizing the funding. In some other states, grantees have chosen to put most of their funding into private property redevelopment or programs that favor higher income individuals and communities. In California, we’re putting most of our housing program into the affordable rental program to address the needs of disadvantaged community members.

Will there be a scoring system in terms of general affordable housing which does not lean towards special interest groups, so is it necessary to have certain percentages of special interest groups?

The scoring criteria has not yet been designed or developed. We’ll be taking feedback from stakeholders including from other state programs. We have the goal of aligning with the AB434 Super NOFA, so developers don’t have to put in additional work to apply for multiple programs. We are trying to make it the least burdensome. There will be ongoing discussion after the Action Plan is approved to make sure that all stakeholder groups are heard.

Question 6: Will there be a set-aside for special needs populations?

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Answer 6: At this time, it is not determined if there will be a special set-aside or if it will get integrated into the scoring criteria. That will be discussed in future program design meetings with stakeholders and the public. We are going to look at our current programs to harmonize them, and as rapidly as possible, deploy this funding in communities using current program structures.

In the owner-occupied reconstruction program, any household with a special needs member with functionality needs will move to top of tier.

Question 7: Why is MHP limited to rental only? If the goal is to replace affordable housing units overall, why not include - or at least not exclude - multifamily affordable ownership housing as well?

Answer 7: That already exists with our homebuyer assistance program for LMI households impacted by the disaster to receive down payment assistance. It does not have to be a single family, detached unit. It could be a multifamily unit and is open to homeowners as well as renters impacted by the disaster. It is important to note that this funding was appropriated by Congress to have a tie-back to the disaster. In looking at the population impacted by this disaster, the majority were renters.

I am not aware if any of the data shows that any condominiums were destroyed that were uninsured or under insured. Therefore, there is no tie-back opportunity.

We are aware of the insurance gaps, but the intention is for SBA loans or other funding mechanisms to cover those. CDBG-DR is coming in to cover the gap for those that did not have insurance.

Question 8: Are developers able to partner with tribal entities and/or emerging developers?

Answer 8: I'm not sure how you are using "partner". Multifamily projects will be eligible to be developed on tribal land with tribal entities. We are having another public comment session with tribal entities later this afternoon. They will be eligible for the MHP program side of things.

Question 9: Can local jurisdiction apply for MHP and then publish their own NOFA?

Answer 9: At this time, we are not envisioning that model. One of the takeaways from the 2017 and 2018 disasters has been that the subrecipient model had drawbacks that made it difficult to deploy resources so with the extraordinarily limited resources in this round of appropriations, the determination was made to do a traditional NOFA process directly with developers.

Question 10: Are the individual jurisdictions administering the NOFA, or is HCD administering the NOFA?

Answer 10: As it currently stands in the Action Plan, it is envisioned that HCD is administering the NOFA.

Question 11: What is the developer funding cap per application? Also, can developers apply in more than one county?

Answer 11: The funding cap at this time has not been determined. We are going to look across the various programs to understand what funding levels are reasonable. HUD requires a

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reasonableness test, but allows the grantees, in this case the State of California, some flexibility to determine what is reasonable.

For the second half of the question, I don't see any reason why a developer cannot apply for multiple projects in multiple jurisdictions as long as they are separate projects that are not reliant on each other.

Question 12: The Governor previously provided \$12B in State's budget for homelessness and new construction. Only \$2.75B has been released for Home Key. With the huge unmet needs here, can HCD look to that \$9.25 balance of funds for this program?

Answer 12: We're unfortunately in a statewide housing crisis so the programs covering housing and homelessness programs are across the state in multiple jurisdictions. The communities applying for DR funds can also apply for these programs.

Additional state resources are available to be leveraged in conjunction with these federal dollars, but this Action Plan is designed specifically for the special appropriation from Congress regarding these specific disaster recovery efforts.

Question 13: Can you please post the listserv?

Answer 13: Please register to get the update emails from us. Our next step is to incorporate the comments we receive, send to HUD for approval, get grant agreement, and then develop policy and procedures and the nitty gritty of program implementation. In the next few weeks, we will come in to talk about the 2021 CDBG-DR allocation as well. If you signed up for the listserv, you will also be notified about that Action Plan. Thank you everyone for joining us. We will be sharing slides with meeting attendees after this meeting.

2020 Consultation and Meeting Attendance Summary

Public Meeting Attendees - May 19, 2022

First Name	Last Name	Email
Mona	Akbar	mona.akbar@hcd.ca.gov
Amy	Bergstrand	abergstrand@cityoforoville.org
James	Coble	jcoble@ccdof.org
Mike	Cottone	mcottone@trinitycounty.org
Stephanie	Gaul	sgaul@cityofnapa.org
Jake	Fender	jfender@nvcss.org
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Melissa	Reece	mreece@srcharities.org
Valeri	Mihanovich	valeri.mihanovich@caloes.ca.gov

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2020 Pre-Action Plan Development Outreach Meetings

Outreach Meetings – Pre-Action Plan Development				
DATE	Email Contact	MEETING	PURPOSE	PARTIES REPRESENTED
12/16/21	DR Related Cities and Counties	Cities and Counties	Inform DR Cities and Counties about 2020 Allocation and other Action Plan Amendments at HCD	DR 4558 and 4569 Cities and Counties
12/21/2021	Stakeholder Outreach	Inter-Agency Kick Off	HCD had pre-FRN briefing with Stakeholders: CalOES, OPR and CalFIRE on overview CDBG-DR Action Plan Amendment, new allocations, and substantial amendments	CalFire, CalOES, and OPR
3/24/2022	Via CalOES	Long-Term Housing Recovery Meeting organized by CalOES	<ul style="list-style-type: none"> • Provide an overview of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan requirements, timeline, and public comment period engagement • Other HCD funding for Disaster Recovery 	All DR Cities and Counties
4/1/2022	Agency Partners	Inter-Agency Meeting	Approach on CDBG DR action plan planning and capacity-building from other state agencies and proposals for aligning disaster recovery projects with housing, transportation, climate adaptation policies, and programs.	CalOES, OPR, CalFire, Dept of Transportation - DOT
4/20/2022	All 4558 and 4569 Cities and Counties	Action Plan Development Meeting	<ul style="list-style-type: none"> • Provide an overview of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan requirements, timeline, and public comment period engagement • Reference other state and federal funding for mitigation needs • Other HCD funding for Disaster Recovery 4 • Holistic Approach to Disaster Recovery • Coordinate outreach efforts for local community and advocacy groups • Discuss alignment with state housing, transportation, and climate change policies 	All 4558 and 4569 Cities and Counties

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4/21/2022	All 4558 and 4569 Tribal Govt. Contact List	Action Plan Development Meeting	<ul style="list-style-type: none"> • Provide an overview of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan requirements, timeline, and public comment period engagement • Holistic Approach to Disaster Recovery • Reference other state and federal funding for mitigation needs • Other HCD funding for Disaster Recovery • Coordinate outreach efforts for local community and advocacy groups • Discuss alignment with state housing, transportation, and climate change policies 	All 4558 and 4569 Tribal Govt.
4/26/22		Voluntary Organizations/Charities/Disaster survivors	<ul style="list-style-type: none"> • Provide an overview of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan requirements, timeline, and public comment period engagement • Reference other state and federal funding for mitigation needs • Other HCD funding for Disaster Recovery • Coordinate outreach efforts for local community and advocacy groups 	Disaster Survivors Voluntary Organizations Charities Non-Profits

2020 Tribal Government Outreach Summary

Organization	First Name	Last Name	Email	Counties
Tyme Maidu Tribe-Berry Creek Reservation - Butte County	Francis	Steele Jr.	fsteele@berrycreekrancheria.com	BUTTE
Butte County - Enterprise Rancheria	Glenda	Nelson	info@enterpriserancheria.org	BUTTE
Butte County - Mechoopda Indian Tribe	Dennis	Rameriz	mit@mechoopda-nsn.gov	BUTTE
Butte County - Mooretown Rancheria	Ben	Clark	lwinner@mooretown.org	BUTTE

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Berry Creek Rancheria of Maidu Indians	Jennifer	Santos		BUTTE
Karuk Tribe - Siskiyou County	Sarah	Spence	sspence@karuk.us	SISKIYOU
Karuk Tribe - Siskiyou County	Erin	Hillman	ehillman@karuk.us	SISKIYOU
Karuk Tribe - Siskiyou County	Joshua	Saxon	jsaxon@karuk.us	SISKIYOU
Karuk Tribe - Siskiyou County	Jaclyn	Owensbey	jowensbey@karuk.us	SISKIYOU
Karuk Tribe - Siskiyou County	Emma	Lee Perez	emmaleeperez@karuk.us	SISKIYOU
Quartz Valley Reservation - Siskiyou	Kayla	Super	tribalchairman@qvir-nsn.gov	SISKIYOU
Kashia Band of Pomo Indians of the Stewart's Point Rancheria	Brittany	Castillo-Sheard	reception@stewartspoint.org	SONOMA
Sonoma County - Dry Creek Rancheria of Pomo Indians	Chris	Wright	chrisw@drycreekrancheria.com	SONOMA
Sonoma County - Kashia Band of Pomo Indians of the Stewart's Point Rancheria	Dino	Franklin Jr.	dino@stewartspoint.org	SONOMA
Sonoma County - Lower Lake Rancheria	Darin	Beltran	darinbeltran@koination.com	SONOMA
Sonoma County - Lytton Band of Pomo Indians	Marjorie	Mejia	margiemejia@aol.com	SONOMA
Sonoma County - Cloverdale Rancheria of Pomo Indians of California	Patricia	Hermosilla	redtailhawk1056@aol.com	SONOMA
Sonoma County - Federated Indians of Graton Rancheria	Greg	Sarris	lross@gratonrancheria.com	SONOMA
Fresno-Table Mountain Rancheria	Modesty	Sand	msand@tmr.org	FRESNO
Fresno Co - Big Sandy Rancheria	Elizabeth	Kipp	lkipp@bsrnation.com	FRESNO

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Fresno-Table Mountain Rancheria	Samuel	Elizondo	selizondo@tmr.org	FRESNO
Fresno-Table Mountain Rancheria	Helena	Alarcon	csrchair@netptc.net	FRESNO
Shasta Co - Redding Rancheria	Jack	Potter Jr.	reception@redding-rancheria.com	SHASTA
Shasta County - Pit River Tribe	Anges	Gonzalez	administrator@pitrivertribe.org	SHASTA
Tulare - Tule River Indian Reservation	Neil	Peyron	Neil.Peyron@tulerivertribe-nsn.gov	TULARE
Madera Co - North Fork Rancheria	Fred	Beihn	nfrancheria@nfr-nsn.gov	MADERA
Madera Co - Picayune Rancheria of Chukchansi Indians	Claudia	Gonzales	cgonzales@chukchansitribe.net	MADERA
Mendocino County - Cahto Tribe	Suzanne	Romero	sromero@hoplandtribe.com	MENDOCINO
Mendocino County - Cahto Tribe	Mary	Norris	chair@cahtotribe-nsn.gov	MENDOCINO
Mendocino - Hopland Band of Pomo Indians	Sonny	Elliott Sr	sjelliott@hoplandtribe.com	MENDOCINO
Mendocino - Pinoleville Pomo Nation	Alicia	Tlelo	aliciat@pinoleville-nsn.gov	MENDOCINO
Mendocino - Coyote Valley Band of Pomo Indians	Rachel	Whetstone	tribalcfo@coyotevalley-nsn.gov	MENDOCINO
Mendocino - Guidiville Indian Rancheria	Donald	Duncan	admin@guidiville.net	MENDOCINO
Mendocino - Manchester Band of Pomo Indians	Jamie	Cobarruria	lisa.elgin@yahoo.com	MENDOCINO
Mendocino County - Potter Valley Tribe	Salvador	Rosales	pvsecretary@pottervalleytribe.com	MENDOCINO
Mendocino - Redwood Valley Little River Band of Rancheria of Pomo	Debra	Ramirez	debrarv1@gmail.com	MENDOCINO

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Mendocino - Round Valley Reservation	James	Russ	president@council.rvit.org	MENDOCINO
Mendocino - Sherwood Valley Rancheria	Melanie	Rafanan	svrchair@sbcglobal.net	MENDOCINO
San Diego Co - Inaja-Cosmit Band of Mission Indians	Rebecca	Osuna	inaja_cosmit@hotmail.com	SAN DIEGO
San Diego Co - La Jolla Indian Reservation	Norma M.	Contreras	norma.contreras@lajolla-nsn.gov	SAN DIEGO
San Diego Co - La Jolla Indian Reservation	Fred	Nelson Jr.	fred.nelson@lajolla-nsn.gov	SAN DIEGO
San Diego - Los Coyotes Band of Mission Indians	Ray	Chapparosa	zcarrillo@sycuan-nsn.gov	SAN DIEGO
San Diego - Pala Band of Mission Indians	Patrick	Buttron	Pbuttron@palatribe.com	SAN DIEGO
San Dirgo - San Pasqual Band of Mission Indians	Mark	Schultz	marks@sanpasqualtribe.org	SAN DIEGO
San Diego - Sycuan Band of the Kumeyaay Nation	Zach	Carrillo	zcarrillo@sycuan-nsn.gov	SAN DIEGO
San Diego - Barona Band of Mission Indians	Raymond	Welch	counciloffice@barona-nsn.gov	SAN DIEGO
San Diego - Ewiiapaayp Band of Kumeyaay Indians	Robert	Pinto Sr.	ceo@ebki-nsn.gov	SAN DIEGO
San Diego - Jamul Indian Village	Erica	Pinto	epinto@jiv-nsn.gov	SAN DIEGO
San Diego - Manzanita Band of Kumeyaay Nation	Angela	Santos	ljbirdsinger@aol.com	SAN DIEGO
San Diego - Pauma Band of Mission Indians	Temet	Aguilar	thawk@pauma-nsn.gov	SAN DIEGO
San Diego - Rincon Band of Luiseno Indians	Fredrick	Mazzetti	bomazzetti@aol.com	SAN DIEGO
San Diego - Santa Ysabel Band of Diegueno Indians	Bernice	Paipa	bpaipa@iipaynation-nsn.gov	SAN DIEGO

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San Diego - Viejas Band of Kumeyaay Indians	Ray	Teran	rteran@viejas-nsn.gov	SAN DIEGO
Plumas County - Greenville Rancheria	Kyle	Self	pallen@greenvillerancheria.com	PLUMAS
Lake Co - Big Valley Band Rancheria	Phillip	Gomez	chairman@big-valley.net	LAKE
Lake Co - Habematolel Pomo of Upper Lake	Sherry	Treppa	Aarroyosr@hpultribe-nsn.gov	LAKE
Lake Co - Middletown Rancheria of Pomo Indians	Jose	Simon, III	tc@middletownrancheria.com	LAKE
Lake Co - Robinson Rancheria	Beniakem	Cromell	estauffer@rrcbc-nsn.gov	LAKE
Lakeport/Contra Costa Co - Scotts Valley Band of Pomo Indians	Terre	Logsdon	terre.logsdon@sv-nsn.gov	LAKE
Yolo Co - Yocha Dehe Wintun Nation	Anthony	Roberts	aroberts@yochadehe-nsn.gov	YOLO
San Bernardino Co & Riverside Co. Colorado River Indian Tribe	Terrilynn	Little	critfiredept@yahoo.com	SAN BERNARDINO
San Bernardino County - Fort Mojave	Timothy	Williams	TimothyWilliams@fortmojave.com	SAN BERNARDINO
San Bernardino County - San Manuel Band of Mission Indians	Sarah	Bruns	Sarah.Bruns@SanManuel-nsn.gov	SAN BERNARDINO

2020 Continuum of Care Outreach Summary

Continuum of Care	Contacted	Response
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Butte County Department of Employment and Social Services	3/22/22	1-No facilities damaged 2- Some unhoused /precariously housed individuals living in RVs or tents on properties. Some residents returned to their property and residing in less than ideal housing including dry camping in RVs without any amenities. 3. Uptick in clients needing immediate assistance post disaster; CalFRESH & housing asst.
NorCal CoC (Shasta, Modoc, Siskiyou, Lassen, Plumas, Sierra, and Del Norte Counties)	3/22/22	Followed up by phone, no response.
Dos Rios (Colusa, Glenn and Trinity Counties)	3/22/22	Followed up by phone, no response.
San Mateo County	3/22/22	No damage reported from the 2020 fires.
Santa Clara County	3/22/22	Followed up by phone, no response.

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<p>Santa Cruz County</p>	<p>3/22/2022, 4/6/22</p>	<p>1. No formal facilities in the area that were damaged by the fires. There was a significant loss of housing stock, including some formal and informal rental housing, in the most impacted areas. The loss of housing stock impacted elderly and disabled households living in the region. Later pull some limited information on the number of elderly/disabled households that utilized fire-related shelter resources.</p> <p>2. Our team that provides staffing support to the CoC has heard anecdotal stories of individuals and families displaced from their living arrangements due to the fire, including people living in encampments and informal housing/sheltering arrangements. In our Homeless Management Information System (HMIS) we ask people where they were last living before becoming homeless. In calendar year 2021, the largest number of people seeking services from an HMIS provider that identified the location of their last housing, identified zip code 95060, a region that includes areas impacted by the fire. 1,119 individuals identified this area as their last place of stable housing.</p> <p>3. This is difficult to discern because our housing for health/homelessness response system was not equipped to handle the volume of need for support prior to the fire. The fire did increase the need for temporary shelter resources and most of those operations were not tracked in HMIS. The graph below shows the number of “actively homeless” households in our HMIS system over time. We had a fairly steady increase in households experiencing homelessness in 2020 then some stabilizing of the # in early 2021 and an increase in the summer of 2021. It’s difficult to know the causes of these fluctuations. Our County conducted a point-in-time count of persons experiencing homelessness at the end of February 2022 and our field survey included questions on the # that lost housing due to the fires. Results from this work will not be available until the summer of 2022.</p> <p>Summary from what I’ve heard and learned: Loss of single family homes and some rental housing/shared housing in the fire impacted region added to a baseline lack of housing options in the County that likely contributed to increased housing instability and steady rises in homelessness. Having CDBG-CR funding to help with rebuilding and/or creating new housing and affordable housing stock will be very helpful. Flexibility to allow some of these funds to be used at the local level for interim/temporary housing programming would also be appreciated. Let us know if you have further questions.</p>
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Solano County CA-18	3/22/2022. 4/7/22	We are not aware of any facilities damaged other than people's homes, we are not aware of impacts to alternatively housed communities, and our volume did not increase due to the disaster
Sonoma County	3/22/22	
CA-513 Visalia/Kings/Tulare Counties	3/22/22	Followed up by phone, no response.
Mendocino County	3/22/2022. 4/6/22	1) No damage 2) No significant or notable impacts. No homeless encampments, SRO buildings, or migrant housing projects were impacted. 3) Client volume did not increase or decrease as a result of the 2020 Wildfires.
Monterey/San Benito Counties	3/22/22	Followed up by phone, no response.
Napa County	3/22/2022. 4/8/22	None of our CoC-related facilities were damaged, we can absolutely demonstrate the housing and shelter impacts. Housing & Homeless Services operated a few different programs during the fires, and directly following (housing and sheltering programs).
San Bernardino City & County CoC	3/22/22	Followed up by phone, no response.
Los Angeles City & County CoC CA-600	3/22/22	Followed up by phone, no response.
CA-514 Fresno City and County/Madera County	3/22/22	Followed up by phone, no response.
San Diego County CoC CA-601	3/22/22	Followed up by phone, no response.
CA-516 - Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC	3/22/22	Followed up by phone, no response.

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CA-517 - Napa City and County CoC	3/22/22	Our office showed up to the Local Assistance center offering services, but it was a lot of owner occupied. We received a few applications for section 8, but were not impacted tremendously, but as a result of CARR Fire and fires since our community has lost many homes, which those families had to find temporary housing. This has impacted the affordable housing market as we have none right now and families that are not low income find housing faster and leaving no vacancy for low income families. We are just now administering funds that were allocated from the 2018 CARR fire, which will still take 3 to 5 years to develop multi family homes. Any additional funding to support affordable housing is always needed in our community.
Stanislaus County	3/22/22	Followed up by phone, no response.
Yolo County	3/22/2022, 4/6/22	<p>Total Fire perimeter between us, Napa & Solano was 305,650 acres. Yolo didn't have the same damages as the other two counties and because of that we actually didn't qualify for any Federal programs. I had to petition for 3 months just to get into State Recovery programs (it was rather unfortunate).</p> <p>Because of the "weird" loophole that Yolo fell into....there were not many programs our affected population could make use of....we even implemented a way to give a "break" on permitting costs for the couple of homes that were lost in the fire (thank you to the Dept of Community Services for that).</p> <p>For that one we did have evacuations and a shelter was opened for a little bit (but nobody actually came to it). The Fire Agencies in Yolo were AWESOME and most of them worked for a straight 72 hours on the East perimeter fire line as CalFire didn't have enough resources to hold the entire Fire Perimeter.</p>

2020 Public Housing Authority Outreach Summary

Housing Authority	Contact Date	Response
Butte	3/22/2022	Followed up via phone and email, no response.
Trinity	3/22/2022	Followed up via phone and email, no response.

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Mendocino	3/22/2022	Followed up via phone and email, no response.
Sonoma	3/22/2022	Followed up via phone and email, no response.
Lake	3/22/2022	Our PHA owns no public housing, so we were not impacted by a loss of units during the noted wildfire. Additionally, we had no tenant impact in our HCV program as a direct result of the fire. An ongoing issue in Lake County is the loss of housing units due to several years of destructive wildfires. The loss of units available to rent has impacted the number of units available for HCV program participants. Property owners have options when deciding to rent a unit, and the HCV participant is definitely at a disadvantage with rents steadily increasing in Lake County at this time.
Los Angeles	3/22/2022	<ol style="list-style-type: none"> 1. An analysis of the disaster impacts on PHAs and HCV programs <ol style="list-style-type: none"> 1. The most recent wildfire disaster in 2020 had no impact on the LACDA and its HCV programs. 2. A summary of funding sources available to PHAs to fund repairs and impacts related to the disasters <ol style="list-style-type: none"> a. The LACDA utilizes its HCV administrative funding, until federal funding is provided as a reimbursement. 2. Understand the unmet needs/gap the PHAs are facing because of the disasters

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		b. The LACDA has no unmet needs/gap at this time.
City of Napa	3/22/2022	<p>The Housing Authority of the City of Napa operates its HCV program countywide in the County of Napa. It has no public housing units. For the 2020 fires, a total of three homes occupied by HCV participants were destroyed and one other home incurred minor damage.</p> <p>The PHA has not been asked by the private owners to assist in funding repairs.</p> <p>There are unmet needs in the community due to the destruction of mobile homes primarily occupied by low-income households. However, as described above, the majority of these households are not Section 8 participants.</p>
Solano	3/22/2022	No impacts from the 2020 fires.
San Bernardino	3/22/2022	
San Mateo	3/22/2022	
Santa Cruz	3/22/2022	<p>1. The CZU August Complex fire in Santa Cruz County was catastrophic, displacing over 1,000 families who lost their homes in the fire. Most of the units lost were single family dwellings that were owned by their occupants, with fewer than 25% of the units lost estimated to have been rental housing. No PHA properties were damaged or destroyed in the fire. Four HCV rental units were destroyed, and all of these households have since</p>

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		<p>been re-housed locally using their vouchers. No funding sources 2. There was already a scarcity of rental housing in Santa Cruz County. The loss of even a modest number of units exacerbates this situation. Currently, hundreds of families with HCV vouchers are searching but cannot find a unit with a landlord who will accept their voucher.</p>
Monterey	3/22/2022	<p>The Housing Authority of the County of Monterey did not have any direct impacts related to the 2020 wildfires. We have many unmet needs.</p>
Tulare	3/22/2022	<p>Followed up via phone and email, no response.</p>
Shasta	3/22/2022	<p>We did not have any HCV participants that lost their homes. We provided disaster applications in conjunction with the Local Assistance Center. We do not have any funding sources for this disaster. We partner internally with our Community Action Agency Rehabilitation and First Time Homebuyer programs. -We have a lack of affordable housing in Shasta County due to all fires dating back to 2018. This is our largest gap overall in the county.</p>
City of Vacaville	3/22/2022	<p>No impacts from the 2020 fires.</p>
Sonoma	3/22/2022	<p>Followed up via phone and email, no response.</p>

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Madera	3/22/2022	Followed up via phone and email, no response.
Fresno	3/22/2022	Followed up via phone and email, no response.
San Diego	3/22/2022	San Diego Housing Commission didn't have any property claims related to wildfires or requiring FEMA assistance.
Stanislaus	3/22/2022	Followed up via phone and email, no response.
Yolo	3/22/2022	Followed up via phone and email, no response.

2020 Disasters - Summary of Outreach & Public Comment for Action Plan Amendment Number 2

The substantial Action Plan Amendment proposed changes to the Homebuyer Assistance program and Disaster Recovery Multi-Family Housing Program.

The following provides a summary of public comments for the 2020 CDBG-DR Action Plan Amendment #2 during the public comment period beginning April 26th, 2023, through May 26th, 2023.

2020 APA #2 Virtual General Public Comment Meeting – May 26, 2023

The following transcript is from the virtual public hearing held on May 17th, 2023, as the required public hearing for the 2020 CDBG-DR Action Plan Amendment #2. Questions are from meeting participants and answers are from HCD staff.

1. Public Comment Why not Lake County?

HCD Response: Thank you for your comment. Lake County was not identified by HUD as the Most Impacted and Distressed (MID) Area for the 2020 CDBG DR Allocation for CA. Link for the Federal Register Notice: www.govinfo.gov/content/pkg/FR-2022-02-03/pdf/2022-02209.pdf

2. Public Comment: Will we receive a link for the presentation? Owner-Occupied was not discussed while it appears on the budget slide in the middle.

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HCD Response: Yes, the presentation slides will be sent to all attendees. There are no changes to the Owner-Occupied Rehabilitation Program. The budget table is shown on presentation slide 11 is the Budget for all the programs for the 2020 allocation, the budget chart was used as for context. The changes are made to the orange/gold colored programs only; which is Multi-Family Housing Program, Homebuyer Assistance Program, and Multi-Family Mitigation Program.

3. Public Comment: Thank you for clarifying the highlighted GOLD section was all that was in scope for the call today on the Budget slide It is unfortunate and DESPICABLE that disaster survivors from 2018 and 2020 are still waiting for funding assistance from our State. The Funds were approved by Congress so long ago. My eyes are opened to the term "job security" and what it really means. People who have suffered tremendous loss are just put through the motions. I've heard this same script on previous calls. Scripting in regard to Scoring. Truly shameful. Yet there were promises for GAP Funding.

HCD Response: Thank you for your comment. The Congress allocation was made in November of 2021 and the Federal Register Notice was issued in February of 2022. HCD has 180 Days to submit an Action Plan to HUD. HUD has 60 days to approve our action plan. The funding does not start at the appropriation level. We still have to wait for the FRN and come up with an action plan. There are steps involved before the funding is released.

4. Public Comment: State policy priorities and the lowest income are not HUD requirements and will make it more difficult for developers in disaster areas.

HCD Response: Thank you for your comment.

5. Public Comment: Why is HCD not allowing local jurisdictions to run the MHP Programs?

HCD Response: We decided with the 2020 funding allocation being small as it is to run the program directly, so we do not incur administrative or activity delivery cost at subrecipient level

6. Public Comment by Butte County: And if local jurisdictions (Butte) had received the MHP allocation we would have already gone out for proposals....

HCD Response: Thank you for your comment.

7. Public Comment: If a jurisdiction has a homebuyer assistance program they cannot apply for funding because you are using a contractor?

HCD Response: That is correct. This will be directly assisted from our subrecipient to potential home-owners.

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8. Public Comment: Can a project developer do more than 1 project or limited to 1 project?

HCD Response: Yes, for the MHP Program, we do not have any restriction on the number of projects as long as it is demonstrated within the developer's capacity to successfully complete all projects within the required expenditure deadlines as set forth by HUD in the Federal Register Notice.

9. Public Comment: Is there any limits on the funding other than the MHP Per Unit limits?

HCD Response: At this time, limit is the higher of demonstration need or the per-unit subsidy limit as published by the FHA for Disaster Funding of the component.

10. Public Comment: Funding can be up to 40% of the project funding cost? Is that still part of the program or has it been changed?

HCD Response: That was for the policy 2017 and 2018 CDBG Program. This is based on the per unit subsidy limit per FHA limit based on number of bedrooms.

11. Public Comment: Why is HCD not allowing local jurisdictions to run the MHP Programs.

HCD Response: It is most efficient to operate the small allocation in the manner of Notice of Funding availability directly.

12. Public Comment: Would there be any instance where you would have new construction project with the mitigation funding?

HCD Response: At this point, one of the objectives of this action plan amendment is to remove that eligible use so that multi-family mitigation use will be only available for existing multi-family to bring them to the WUI Standard.

13. Public Comment: On the slides, timeline of the different substantial amendments, funds will not be available till middle of 2024, when will the NOFA be out and scored? Are the funds available when the scoring is done, or get grants documents done? Give me the timeline?

HCD Response: HCD Timeline regarding NOFA scoring, and application is not part of this action plan amendment, it is still under determination. At this time, we are hoping for an estimated Q3 there are several factors playing for this timeline included when this action plan accepted by HUD and if there is indeed additional action plan amendments needed prior to the release of Notice of Funding availability.

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14. Public Comment: With the third quarter - do you think that it will be possible to apply for round 1 tax credits?

HCD Response: Tax credit allocation committee has not published their 2023 Calender so we cannot comment on that yet.

15. Public Comment: if a sub recipient already geared up for 2017 or 2018, they already have the infrastructure to run the MHP program. Also, as we saw from this round of tax credits, there aren't enough to fund the CDBG-DR projects from 2018.

2020 APA#2 Written Public Comment

The following questions were received in writing by HCD staff during the required 30-day public comment period for the 2020 CDBG DR Action Plan Amendment #2.

a. Public Comment – Email received 5/17/23 from Community Housing Improvement Program (CHIP).

You mentioned that the homebuyer assistance is for relocation. Does this mean if someone wants to purchase a home in a burn scar that they won't be eligible for this funding? I appreciate the clarification. Thanks

HCD Response: Thanks for your question and for your patience. I was hoping that I would be able to provide a precise answer to your important question, but unfortunately all I can say for now is that there are scenarios in which a homebuyer could purchase a home in the burn scar and that this information will be included in the policies and procedures that will be released after HUD approves the Action Plan in early August.

Please see attachment for additional public comment letter sent to HCD.

2021 Disasters - Action Plan Amendment 3 - Summary of Outreach & Public Comment

2021 Pre-Action Plan Development Outreach

Date	Meeting Type	Purpose	Participants
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12/21/2021	Inter-Agency Kick Off	HCD had pre-FRN briefing with Stakeholders: CalOES, OPR and CalFIRE on overview of 2020 CDBG-DR Action Plan development, new allocations for 2021, and substantial amendments	CalFire, CalOES, and OPR
6/17/22 6/23/22	AP Development and Requirements	<ul style="list-style-type: none"> · Informational meeting to inform Plumas County about the FRN Data requirements, Public Comment meetings, outreach and publications. · Goals and timeline for Action Plan Implementation · Planning capacity using other HCD funding · DRGR Requirements · Mobile Home Units damaged (CalFire Data) 	Plumas County
08/15/22	AP Development Meeting	HCD had briefing with Stakeholders: CalOES, OPR and CalFIRE on overview CDBG-DR Action Plan development for 2021 allocations, and update on 2020 AP and 2018 substantial amendments #2	CalFire, CalOES, and OPR
8/19/22	AP Development Meeting	· Provide an overview of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan requirements, timeline, and public comment period	All the Cities and Counties in the 6 DR 4610

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9/13/22	Public Comment Location and Logistics Meeting	<ul style="list-style-type: none"> · Discuss location and logistics to hold Meetings for Public Comment Period · Groups to engage within the Community · Outreach methods – online newspapers, flyers, CBOs, CoC · DR and Planning Efforts 	Plumas County
9/15/22	AP Development Meeting	<ul style="list-style-type: none"> · Provide an overview of Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan requirements, timeline, and public comment period · Other HCD Funds towards rebuilding 	DR Tribes
12/1/22	AP Development Meeting	<p>Coordinate on data for unmet needs assessment in the long-term recovery plan</p> <p>2021 Action Plan Development</p>	Plumas County HCD; CalOES, FEMA
1/6/23	AP Development Meeting	<ul style="list-style-type: none"> · Discuss specific data needs to justify uses of CDBG-DR allocation. 	HCD, Plumas County and FEMA
2/6/23	AP Development Meeting	<ul style="list-style-type: none"> · Explain DR program requirements; review unmet needs data 	HCD, Plumas County, FEMA
3/13/23	AP Development Meeting	<ul style="list-style-type: none"> · Review existing DR programs and what unmet needs indicate; workshop program tradeoffs 	HCD, Plumas County, FEMA
3/26/23	AP Development Meeting	<ul style="list-style-type: none"> · Engage community group in CDBG-DR program requirements and program decision trade-offs 	HCD, Plumas County, Dixie Fire Collaborative, FEMA

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4/13/23	Disaster Survivor Survey	· Release simple survey to get feedback on unmet recovery needs from LMI disaster survivors who are unable to attend public meetings	HCD, Plumas Rural Services, Dixie Fire Collaborative
4/15/23	Dixie Fire Collaborative Community Meeting	· Present to community group on DR overview, unmet needs, and program considerations	HCD, Dixie Fire Collaborative
5/5/23	AP Development Meeting	· Discuss Plumas County's LTRP and aligning it with CDBG annual planning grant and CDBG-DR Action Plan	Plumas County, FEMA
5/9/23	Plumas County Board of Supervisors Meeting	· Present to county Board on DR overview, unmet needs, and tentative program decision	Plumas County Board of Supervisors, General Public
5/17/23	AP Development Meeting	· Discuss use of funds	Plumas County, Dixie Fire Collaborative
7/14/23	Coordination meeting	· Discuss new development, PG&E settlement resources	Plumas County, Dixie Fire Collaborative, FEMA
7/28/23	Coordination meeting	· Discuss in-person public comment meeting and future amendments	Plumas County, FEMA
6/16	Pre-Public Comment Meeting	· Present Action Plan Amendment to state government partners working on hazard mitigation	Cal OES, CAL FIRE, OPR, DWR, CEA, CDI
6/22	Pre-Public Comment Meeting	· Present Action Plan Amendment to local partners	Plumas County, DFC
6/30	Pre-Public Comment Meeting	· Present Action Plan Amendment and local long-term recovery plan, alongside Plumas County, to the Citizen	OPR's ICARP Technical Advisory Committee

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		Advisory Committee, including state/local/nonprofit climate adaptation leaders	
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2021 Pre-Public Comment Consultation

Pre-Public Comment Consultation with state hazard mitigation stakeholders
 - June 16, 2023

Name	Agency	Email
Frank Bigelow	CAL FIRE	Bigelow, Frank@CALFIRE
Robyn Fenning	Cal OES	Robyn.Fenning@CalOES.ca.gov
Deborah Halberstadt	Department of Insurance	Deborah.Halberstadt@insurance.ca.gov
Jennifer Hogan	California Earthquake Authority	Jhogan@CalQuake.com
Ron Miller	Cal OES	Miller, Ron@CalOES
John Morgan	CAL FIRE	John.Morgan@fire.ca.gov
Dennis O'Neil	CAL FIRE	Dennis.O'Neil@fire.ca.gov
Constance Perkin Gutowsky	Department of Water Resources	PerkinsGutowsky,Constance@DWR
Sarah Samdin	Governor's Office of Planning & Research	Sarah.Samdin@OPR.ca.gov
Kelly Soule	Department of Water Resources	Soule.Kelly@DWR

Pre-Public Comment Consultation with local partners - June 22, 2023

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Name	Agency	Email
Tracey Ferguson	Plumas County	traceyferguson@countyofplumas.com
Debra Lucero	Plumas County	debralucero@countyofplumas.com
Tyler Pew	Dixie Fire Collaborative	tyler@lmnopdesigninc.com
John Russell	FEMA	John.russell@fema.dhs.gov
Tan Hoang	FEMA	Tan.t.hoang@fema.dhs.gov

2021 Virtual General Public Comment Meeting - July 26, 2023

Public Comment #1: Is it possible to find tiny homes, assuming they are built to Chapter 7A WUI Building Code Standards, because they are a much cheaper and faster way to build homes?

HCD Response: Federal and state requirements do not allow for tiny homes, which are required to have wheels attached when funded with CDBG-DR. However, tiny homes are a good activity with which to look for local or other state funds.

Because the foundation is ripped out prior to reconstruction, some counties are reassessing the property as new construction, which increases the tax base of the property. If this is prohibitive, or if the applicant has too much DOB, HCD has amended the construction plans to a smaller unit. As well, tiny homes by their nature are generally temporary, and HCD can only build permanent homes on permanent foundations that align with local zoning codes.

Public Comment #2: The allocation at only 8.5% of unmet needs is inadequate and embarrassing for me as a survivor from Greenville.

HCD Response: HCD wholeheartedly agrees with you.

Public Comment #3: Explain the decision not to build multifamily housing.

HCD Response: It is a complicated and frustrating answer. At the beginning of this process, HCD felt sure that it would direct funds towards multifamily housing, because of the unmet needs data. However, because of the application scoring criteria that the Tax Credit Allocation Committee, projects in a remote and high hazard risk area would not have been the most competitive. The queue for tax credits would have been about 5-6 years, and HCD did not feel that was responsible to put an additional project into a half-decade tax credit queue. HCD is restricted from putting more than 49 percent of project financing into a project, due to Article 34 of the California State Constitution, so

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there must be additional financing made available. If additional multifamily financing opportunities were made available, then we would reconsider this decision. We looked for a solution that would enable CDBG-DR funds to build some affordable rental housing within the funding limitations.

Virtual General Public Comment Meeting Attendance

Amity Rembold	arembold@rcac.org
Jennifer Leighty	jleighty@rcac.org
Tracey Ferguson	traceyferguson@countyofplumas.com
allison rettig	arettig@chiphousing.org
Matthew Fogarty	mat.fogarty@gmail.com
Rita Bunzel	rbunzel@spi-ind.com
Ken Donnell	kdd207105@gmail.com

2021 Virtual Tribal Entities Comment Meeting - July 27, 2023

Comment #1: Are supportive services a part of the plan?

HCD Response: HCD provides case management. Any applicant who goes through the process has a case manager. HCD is not providing supportive housing, which would be a very different type of program.

Virtual Tribal Entities Public Comment Attendance

Jared Moore	jared.moore@hcd.ca.gov
Mike Sam	mikesam@climateworkforce.org

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Karen Holbrook	karen.holbrook@hcd.ca.gov
Trevor Portiz	trevor@domusd.com
Dave Cade	davec@drycreekrancheria.com
Reyes Maese	reyesmaese56@gmail.com

2021 In-Person Public Comment Meeting in Greenville, CA - August 3, 2023

Public Comment #1: What is the 80 percent AMI rent limit?

HCD Response: The U.S. Department of Housing & Urban Development (HUD) prepares the rent limits for affordable properties. Affordable rents are calculated so that households earning, in this case under 80 percent of area median income, do not spend more than 30 percent of their rent.

Public Comment #2: What happens when a property owner renting out their deed-restricted unit wants to then move into their unit?

HCD Response: This would be a disqualifying event, and the owner would have to pay back their subsidy. HCD will publish the rules of these types of scenarios in the Policy & Procedures. There could be a scenario in which a property owner wants to sell their unit, and the unit would be sold as a deed-restricted rental unit, per the terms of the subsidy.

Public Comment #3: What happens if the renter moves out or the renter starts making above 80 percent AMI?

HCD Response: HCD will not be suddenly forcing renters out of their homes. There would be a gradual transition to identify market rate housing for a household that becomes higher income. This represents a success story to HCD.

Public Comment #4: Is there an occupancy requirement for the rental units?

HCD Response: Yes. HCD monitoring will ensure that these subsidized units are being rented out to LMI households. Given the housing shortage, it is unlikely that you can go through all LMI households in the county and not find someone to rent the unit to. HCD monitoring also ensure that the unit is safe and clean.

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Public Comment #5: Can someone rebuild multiple units?

HCD Response: A property owner can rebuild a total of four units. Subsidy for more than four rental units would then be classified as multifamily housing, which has different funding requirements.

Public Comment #6: Where are projects eligible?

HCD Response: With this DR-4610 CDBG-DR allocation, projects within in Plumas County that were damaged/destroyed by a DR-4610 disaster are eligible for funding. Part of this funding is forward looking, so some of this is for mitigation in Plumas County.

Public Comment #7: What happens if no one in a community like Greenville is LMI?

HCD Response: First, all of Plumas County is eligible, so we should be able to identify LMI households in other parts of the county. Second, Greenville is an LMI census tract meaning that more than 51 percent of households are at or below 80 percent AMI, so this particular scenario shouldn't be an issue.

Public Comment #8: Not all funds have to go to LMI households, with the 70 percent LMI requirement.

HCD Response: Per HUD's rules, no less than 70 percent of funds must go towards LMI households. But HCD is directing as much as possible towards LMI households.

Public Comment #9: Can a homeowner build multiple homes on a lot where their home was lost?

HCD Response: At this point, this is not an eligible activity. However, if we open up the program, and the project pipeline isn't there, then we can open up the Action Plan with an Amendment and open up a multifamily option. Given single family reconstruction timelines and homeowner needs to bring resources to the table, we want to address the single family housing needs first.

Public Comment #10: What does it really cost to build a unit?

HCD Response: Every lot is unique in rural areas. Hardship provision does allow HCD to go above the \$500,000 subsidy cap, but the threshold for doing this is high since awarding more than \$500,000 to any one household reduces resources for other households. What we're seeing in Butte County, the 2Bed/2Bath homes are running about \$600,000 to \$630,000.

It is important that homeowners bring all other resources into the process, including any FEMA IA awards (\$39,400), insurance, and drawn down SBA loans. These resources

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are all considered a duplication of benefits that CDBG-DR cannot replace. In order for these resources to not be considered a DOB, then the homeowner would need to provide documentation that those resources were used for housing expenses. It is a line item by line item discussion, and homeowners need to bring receipts.

Public Comment #11: How would one get ahead of the application process? When is the application available?

HCD Response: The application is documentation that shows that the residence is the owner's primary residence at the time of the qualifying disaster, income documentation that identifies a household at LMI, and any documentation on other disaster recovery resources. HCD will do extensive outreach to households after the planning phase, and the application checklist is included in the policies & procedures. HCD is happy to work with everyone on sharing this information. Everyone here is working with the population who we are trying to serve, so we will be working together to share this information and support eligible households.

Public Comment #12: Can some of the CDBG-DR admin funding for disaster case management?

HCD Response: HCD does not have funding to support disaster case managers. There is a structural funding gap for this service. The county social service offices that we have worked with have sometimes been able to pull together resources.

Public Comment #13: Some long-term recovery groups have been successful, but they need a funding source.

HCD Response: We've seen in other communities that this work has been funding through charitable organizations, like community foundations. In larger counties, the chambers of commerce have provided this funding.

Public Comment #14: What is the admin cost being used for?

HCD Response: In reality \$1.2 million to run a grant program for six years is not a lot of money, and the State of California has not provided additional funding for this work. HUD does not change reporting requirements depending on grant size – same if it's \$24 million or \$1 billion. Larger grants would have much more money for admin. The compliance requirements are extremely onerous. These are grant dollars, so there is significant scrutiny on how this money is spent. The admin for this grant actually costs more than \$1.2 million.

Public Comment #15: Will disaster case managers be in place next year when CDBG-DR is doing application intake?

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HCD Response: HCD sees an opportunity. If we can show that HCD is trying to prepare the program pipeline and have a functional program, then we have an opportunity to ask FEMA for a DCM extension.

Public Comment #16: Dixie Fire Collaborative has prioritized funding on DCMs, which has forced us to hold resources back for other recovery activities.

HCD Response: n/a

Public Comment #17: What does this environmental review process mean?

HCD Response: This is NEPA phase 1 review. We have to show that the site is scraped and that toxic substances have been remediated. Need to show that this was part of the OES debris removal program. HCD works with Planning Departments to coordinate with local environmental departments. HCD also has to work with the Office of Historical Preservation, to ensure that the structure was not historical.

Public Comment #18: What are the Chapter 7A+ standards? How is the solar related to that?

HCD Response: Chapter 7A+ standards refers to a “wildfire prepared homes” standard that the Institute for Building and Home Safety established. This standard then informs the California Department of Insurance’s Safer from Wildfires regulation, which incentivizes risk reduction with lower insurance premiums. Cal OES and CAL FIRE are using this same standard for their California Wildfire Mitigation Program, which is the AB 38 home hardening program that is currently being piloted throughout the state. This includes the class A roof, mesh in the gutters, and defensible space. HCD’s contractor would do some zone 0 and zone 1 vegetation management so that these owners can take advantage of the insurance discounts.

HCD does not have a direct connection with the Insurance Commissioner, which is why we are building the most resilient homes, so that they are insurable.

Greenville Public Comment Meeting Attendees

Jennifer Leighty	RCAC	jleighty@rcac.org
Matt Vaughn	Plumas Rural Services	mvaughn@plumasruralservices.org
Joan Carter	North Valley Catholic	jcarter@nvccs.org

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	Social Services	
John Russell	FEMA	john.russell@fema.dhs.gov
Tyler Pew	Dixie Fire Collaborative	tyler@lmpdesigninc.com
Guy McNett	General Public	n/a
Clint Koble	Sierra Business Development Council	clint.koble@gmail.com
Priscilla Rincon	Plumas Rural Services	princon@plumasruralservice.org
Tracey Ferguson	Plumas County Planning Department	traceyferguson@countyofplumas.com
Adam Toler	Plumas Rural Services	atoler@plumasruralservices.org
Alisha Wilson	Plumas Rural Services	awilson@plumasruralservices.org
Odin Zackman	Build It Green / Dig In	odin@digin.org

2021 Written Public Comment

Comment #1 received from Dominic De Lello of K2 - June 27, 2023

From: Dominic De Lello

Sent: Tuesday, June 27, 2023 10:28 AM

To: Movassaghi, Maziar@HCD <Maziar.Movassaghi@hcd.ca.gov>;

STATE OF CALIFORNIA 2020 CDBG-DR ACTION PLAN
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disasterrecovery@hcd.ca.gov

Subject: 2020 DR Action Plan Amendment 3

1. LMI definition and national objective – this incorporates both low and moderate income in the definitions. According to HCD’s published definition ‘[moderate income](#)’ would include 120%. Can you clarify if this program is eligible to serve renters up to 120%?
2. What are some examples of an eligible applicants for SFRP to receive funds to rebuild rental home(s)?
3. Would HCD consider having a developer apply for SFRP if they wanted to reconstruct let’s say 10 single family rental homes, but in a different area (different meaning not the same lot where the home was destroyed, but within the same jurisdiction)? Or would this be considered “new construction” ?
 1. Or is it more specific of identifying 10 specific homes destroyed in order to allow 10 new homes to be constructed?
4. Can you explain how affordability restrictions are applied to SFRP?
5. Section 4.3.1. makes reference to \$19,526,400, but Figure 150 (and others) make reference to \$20,162,800.

Good morning,

I’m reviewing [2020 DR Action Plan Amendment 3](#) and have the following comments

1. Section 1.1 Overview - makes reference to Amendment #2, but this document is for amendment #3.
2. FIGURE 148: PROGRAM BUDGET – 2021 – there is no cost allocated to new construction, the \$20MM of \$24MM is allocated to only rehab
3. Section 4. Program Budget - a Single Family Mitigation Program (2020) – I think you meant (2021) not (2020)?
4. FIGURE 150: 2021 EXPENDITURE PROJECTIONS – only single family reconstruction? No ***Multifamily new*** construction? (similar to comment #2 above)
5. Section 4.5.2. Criteria to determine the method of distribution, printed page 199, makes reference to Appendix (5.c.). There is no subsection 5.c. in the Appendix; can you clarify?

HCD Response

HCD appreciates your thorough review of and comments on the 2020 CDBG-DR Action Plan Amendment (APA) #3. This public comment draft includes changes made both in the APA #1 and #2, and references to those are occasionally made throughout the document.

HCD, in collaboration with the County, made the difficult decision to not direct funds towards new affordable multifamily construction, due to financing constraints that would prolong the project timeline beyond what HCD believes to be acceptable. Affordable multifamily project financing is constrained by Article 34 of the California State Constitution, under which taxpayer funding cannot provide more than 49 percent of project financing. This constraint functionally requires the use of federal and state Low-Income Housing Tax Credits. However, demand for Tax Credits far exceed the availability, causing a yearslong backlog. Additionally, remote areas

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far away from job centers and high hazard risk areas are not prioritized the Tax Credit Allocation Committee's project ranking criteria. Choosing to direct resources towards reconstruction of single-family owner- and renter-occupied units enables CBDG-DR funds to more quickly produce hazard-adapted units that are affordable to LMI residents.

HCD is directing the full unmet recovery needs allocation (\$20,162,800) towards housing reconstruction through the Single Family Reconstruction Program, which reconstructs units for LMI owners and rental units that are affordable for LMI households. This is functionally an "OOR" Program that includes a "Mom and Pop" landlords as eligible applicants. Eligible applicants include 1) LMI owner-occupants whose home was destroyed in the qualifying disaster and which to rebuild their home as their primary residence; and 2) owners who wish to rebuild a unit that was destroyed in the qualifying disaster as a single family rental unit that is affordable to LMI renters. Note that both owner-occupants and landlords must have owned the residence at the time of the qualifying disaster. Landlords may have previously lived on the property as a primary residence or owned the property as a rental, to provide greater flexibility for rental housing recovery. Landlords may rebuild up to four deed-restricted units that they owned at the time of the qualifying disaster, so long as they are single family units, at which point Article 34 rules go into effect.

The CDBG-DR Program uses the CDBG program's low- and moderate-income (LMI) definition, which is different than the HOME program's definition (https://www.hcd.ca.gov/grants-funding/already-have-funding/docs/meeting_low_mod_income_requirements_for_cdbg_activities.pdf & <https://www.hudexchange.info/resource/5334/cdbg-income-limits/>).

Public Comment will be added to the Appendix of the APA#3 following the conclusion of the Public Comment Period, and following HUD-approval, HCD will post the final APA#3 including Public Comment online.

Amendments are common in the CDBG-DR process, and HCD is open to considering future amendments if local priorities and/or available resources for housing recovery changes.

Comment received from Plumas County – August 8, 2023

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PLUMAS COUNTY

PLANNING DEPARTMENT
DIRECTOR FERGUSON
555 Main Street
Quincy, CA 95971
(530) 283-6214
traceyferguson@countyofplumas.com
www.countyofplumas.com

August 8, 2023

California Department of Housing and Community Development (HCD)
Disaster Recovery and Response Unit
ATTN: Mona Akbar
2020 West El Camino Avenue, Suite 200
Sacramento, CA 95833

SENT VIA EMAIL: disasterrecovery@hcd.ca.gov

RE: COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY
2020 CDBG-DR ACTION PLAN AMENDMENT 3
PLUMAS COUNTY PUBLIC COMMENT

Dear Mona Akbar:

Plumas County understands HCD has released Amendment 3, requesting public comment, concerning the 2020 CDBG-DR Action Plan to incorporate the \$24,408,000 allocation made by Congress to the US Department of Housing and Urban Development (HUD) for the 2021 CDBG-DR impacts by the 2021 wildfires (FEMA DR-4610); and Plumas County residents, being the Most Impacted and Distressed (MID) Area under DR-4610 as a result of the devastating 2021 Dixie Fire and Beckworth Complex Fire, will receive 100% of the disaster recovery allocation (\$20,162,800) and 100% of the mitigation set aside (\$3,024,800). Plumas further understands the remaining grant funds (\$1,220,400) will be utilized by HCD for administration costs, as HCD is the lead and responsible agency for administering the CDBG-DR funds allocated by HUD to the State of California.

As stated in the Executive Summary, HCD strives to ensure that every Californian has a safe, stable, and affordable home. The Action Plan describes HCD's analysis of the collective local and statewide impact of the 2020 disasters (DR-4558 and DR-4569) and the 2021 disaster (DR-4610), the unmet needs resulting from these disasters, and the State's plan for allocating funding to recovery projects and programs in the MID areas, with HCD committing to direct, at a minimum, 70% of the total allocation to benefit CDBG-defined low and moderate income (LMI) individuals or areas in accordance with Section 103 of the Housing and Community Development Act.

|| P u b l i c

Plumas County values the continued open communication and collaboration by HCD staff and the opportunities for County and public comment prior to and within the formal public comment period (June 30, 2023 – August 8, 2023). In particular, the August 3, 2023, public comment meeting in Greenville was especially helpful with in-person HCD representatives delivering a presentation and taking time to answer several engaging questions from fire survivors, Disaster Case Managers (DCMs), the Dixie Fire Collaborative, Rural Community Assistance Corporation (RCAC), County staff, and others from the public.

At the Board of Supervisors meeting of August 8, 2023, the Board, with public and County staff comment, discussed the 2020 CDBG-DR Action Plan Amendment 3. Plumas appreciates the opportunity to respond to HCD and submits the following comments and questions for the record:

1. Clint Koble, public comments read aloud during the public comment period at the August 8, 2023, Board of Supervisors meeting (Enclosure).
2. The \$24,408,000 DR-4610 allocation is grossly inadequate. Based on the HCD estimate of total unmet need (\$286M), the \$24,408,000 allocation only addresses 8.5% of the total unmet need. The HUD unmet needs methodology must be overhauled to effectively respond to the real and specific needs of housing, infrastructure, and the economy when recovering from a wildfire disaster. Recognizing State and local data sources is key in understanding the full picture. For example, the DR-4610 disaster housing impact data includes the FEMA Individual Assistance (IA) verified losses (roughly \$23.5M), which are a woeful undercount of the actual housing impacts. A more accurate source for housing loss information comes from CAL FIRE on-the-ground damage survey data, which reports over 10 times greater total housing impact (roughly \$267M).
3. Plumas sees the programs identified in Amendment 3 for DR-4610 are focused specifically on single-family housing reconstruction and mitigation under the broad umbrella of owner-occupied reconstruction and single-family rental reconstruction, in addition to owner-occupied home hardening/defensible space and single-family rental home hardening/defensible space. Each of these programs offers 'owners' grant funding. What is missing under the eligible activities is an opportunity for 'renters' to become homeowners, which should align with the State's objectives for seeking permanent housing solutions for all Californians. Renters were the largest group of impacted residents (approximately 62% of total verified losses), and with no proposed CDBG-DR program funding for multi-family rental housing at this time, Plumas is strongly requesting HCD consider Amendment 4 to the 2020 Action Plan in the very near future (fall-winter 2023/2024) to develop a program allowing renters impacted by DR-4610 to be eligible specifically for single-family construction grant funding. Data the Dixie Fire Collaborative can provide demonstrates the Pacific Gas & Electric (PG&E) settlements to renters is substantial capital in elevating the possibility for a path to homeownership, with renter interest. Plumas commits to discussions with the Dixie Fire Collaborative and HCD to understand the data driving the request and how a new 'renter' first-time homebuyer construction program may be possible.

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4. Under the single-family rental reconstruction, the requirement to have the reconstructed residence as a deed-restricted affordable rental unit is understandable, and the maximum required affordable covenant period of 15 years at the maximum \$500,000 subsidy is fair when compared to other known affordable housing covenant timeframes.
5. Plumas notes HCD's administration of the single-family reconstruction program will include the need to have the County's Building Department plan check the master construction document set(s) for the State contractor. Building Services staff are prepared to work diligently to make the submittal and plan check process efficient and effective for the benefit of the public and housing recovery. Additional County departments involved in land development such as Planning, Environmental Health, Public Works, and Engineering are ready to be a partner with the State in assisting with land use, planning, zoning, utilities, infrastructure, and other related permit questions and requests for information. Furthermore, the Information Technology (IT) Department will be available to set up a CDBG-DR County website to facilitate the process, as needed, including providing links to HCD program resources, appropriate program contacts, and program application information.
6. Is a portion of the 5% grant administration set-aside funding (\$1,220,400) available for Plumas County staff time associated CDBG-DR administrative activities?
7. Plumas suggests HCD consider developing a checklist for fire survivors of items generally required during the CDBG-DR application intake process and posting the checklist prior to the formal application release to allow time for DCMs to understand and better prepare potential applicants for program and eligibility requirements.
8. What is/are the name(s) of the State's contractor(s) under contract to build the homes under the CDBG-DR single-family reconstruction program?
9. What other California counties under CDBG-DR have successfully utilized the single-family reconstruction program?
10. Will the State's pre-approved master construction document set(s) be available to the public to utilize in re-building, separate and apart from the CDBG-DR 2021 programs?
11. Plumas acknowledges that single-family housing is the greatest need for 2021 wildfire recovery; however, the economy endured major losses that will likely be felt for many years to come, and infrastructure was a total loss in areas. Should the proposed 2021 single-family reconstruction eligible activities not result in interest or qualified applicants, Plumas requests HCD consider a future amendment to the Action Plan that brings additional eligible program activities to meet unmet needs for multi-family housing, economic development, and/or infrastructure.

12. Plumas County's upcoming 7th cycle Housing Element covers the planning period from June 30, 2024, through June 30, 2029, with a total regional housing needs allocation (RHNA) of 154 units, and of those, 62 units are allocated to the very low- and low-income categories (80% or less of area median income). Understanding the \$20M allocation proposed for single-family reconstruction at a subsidy of up to \$500,000 per unit could result in roughly 40 units of new single-family construction for LMI households, how would those 40 units be valued in relation to meeting the County's RHNA? Also, could the existing units funded under the proposed single-family mitigation program for home hardening count toward the County's Housing Element Quantified Objectives for rehabilitation and/or conservation?

In closing, please don't hesitate to contact me at traceyferguson@countyofplumas.com or (530) 283-6214 should there be any questions or clarifications needed. Thank you for HCD's continued coordination and cooperation under DR-4610 and the consideration of the public and Plumas County's 2020 CDBG-DR Action Plan Amendment 3 comments and questions.

Sincerely,



Tracey Ferguson, AICP
Planning Director

Enclosure: Clint Koble, public comments read aloud during the public comment period at the August 8, 2023, Board of Supervisors meeting

Cc: Kevin Kiley, Congressional District 3
Brian Dahle, Senate District 1
Megan Dahle, Assembly District 1
Board of Supervisors, Plumas
Debra Lucero, County Administrative Officer
Sheriff Todd Johns
Sara James, Interim County Counsel
Chuck White, Director of Building Services
John Mannle, Director of Public Works
Rob Robinette, Interim Director of Environmental Health

STATE OF CALIFORNIA 2020 CDBG-DR ACTION PLAN AMENDMENT 3 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

I attended the CDBG-DR public response meeting last Thursday evening in Greenville. I was left with more thoughts and questions than answers.

To begin, I have always been a fan of CDBG because I appreciate Community Development and that's what CDBG is all about. I would like to think that I'm an empathetic person. I don't live in Greenville, but I have donated more time to Greenville than any town I have ever lived in, or friends, neighbors, and for that matter family members.

I care about Greenville because to me, the recovery is more about the recovery that is needed in every rural community. I feel frustrated about the gross inequities that challenge rural and especially, frontier communities. Most lack resources to grow or sustain themselves. All of them, especially the unincorporated, lack political voices, and I sometimes think that is their biggest challenge.

To get to the point, at the CDBG meeting, I listened to how 70% of funds are going to be spend on affordable housing and LMI costs. This concerns me, even as I realize that there probably isn't enough money to help those stuck in LMI.

What I wanted to hear is how CDBG will help Greenville not only recover from the fire, but also the declining path it was on before the fire. That's not likely to happen because response is measured on how much money you bring to a community, rather than on results that lift a community out of LMI, or poverty.

If 70% of our efforts are focused on LMI, then what monies are left for rebuilding economies, businesses, jobs, and a quality of life? Are we simply putting unemployed people in new housing that don't have or can't find a job? How is this approach going to lift Greenville out of LMI? I realize many people in an LMI situation are elderly or disabled in one way or another. They need our empathy, but others need help too.

My question is: How are we going to help the new businesses, entrepreneurs, and innovators change their local economies and quality of life. How are we going to attract new and young families to Greenville when there are no jobs and no housing if they are just above

the poverty line? Are we rebuilding a newer version of a poverty town or are we setting the stage for growth, commerce, resilience, and a greater quality of life? I don't think focusing most of our money and efforts on LMI will affectively change things. I think we need to find out ways to support and build successful and resilient rural economies, but so far, we haven't done that. I think this is where you as leaders and the people of Greenville need to think and act differently. You know what happens when you keep approaching things the same way but keep expecting a different outcome. Not much. I feel we are settling for NOT MUCH.

Would it be crazy to ask for 5% of our CDBG-DR funds to go towards economic development? Would it be fruitless to invest in businesses, growth, commerce, and a higher quality of life? Greenville needs to be more than 70% LMI, but it seems as if our response will ensure it stays that way.

Please remember a few things:

- You can create a job quicker than you can build a house.
- People don't find a house to get a job; they find a job to buy a house. The job is what builds the house.
- Housing and economic develop work best if they go hand in hand. We need a whole community, a diverse community, not mostly an LMI community.
- Every tax dollar, every grant dollar, and every donation dollar come from the same source: someone's paycheck. Let's honor that by thinking and acting differently.

Clint Koble

HCD Response to Tracey Ferguson

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HCD made the difficult decision to not direct funds towards new affordable multifamily construction, due to financing constraints that would prolong the project timeline beyond what HCD believes to be acceptable. HCD recognizes that most of the disaster impacted households in Plumas County were renters, who also receive considerably less disaster assistance through insurance, FEMA assistance, and SBA loans. However, affordable multifamily project financing is constrained by Article 34 of the California State Constitution, under which taxpayer funding cannot provide more than 49 percent of project financing. This constraint functionally requires the use of federal and state Low-Income Housing Tax Credits. However, demand for Tax Credits far exceed the availability, causing a yearslong backlog. Additionally, remote areas far away from job centers and high hazard risk areas are not prioritized the Tax Credit Allocation Committee's project ranking criteria. Choosing to direct resources towards reconstruction of single-family owner- and renter-occupied units enables CBDG-DR funds to more quickly produce hazard-adapted units that are affordable to LMI residents.

HCD recognizes that significant legal settlements from PG&E represent resources that can be utilized for housing recovery and thus shape the Single Family Reconstruction applicant pool and project pipeline. If HCD, the County, and disaster case managers identify during the pre-development phase that the Single Family Reconstruction Program lacks a viable project pipeline, then HCD will consider an additional amendment to provide greater project flexibility, such as new construction. HCD will work diligently with the County, Dixie Fire Collaborative, and disaster case managers to collect data on PG&E settlement amounts to inform potential future amendments.

HCD looks forward to continuing to work with Plumas County to streamline the application, environmental review, and permitting process for CBDG-DR-funded projects. We will work collaboratively to anticipate and mitigate potential hurdles.

Unfortunately, the 5 percent admin cap that HUD provides to the grantee is insufficient to even cover HCD's full program admin costs over the six years. The limited amount of this DR grant does not allow for multiple programs, such as disaster case management (which qualifies as a public service), because this would come at the expense of funding for reconstruction, which is limited to this DR grant. Other sources of funding are available for case management through state agencies (such as Dept of Social Services) or through CalOES. Additionally, we anticipate the fees charged by the building and planning department for plan checks, permits, and inspections to cover the time of staff for reviewing the CBDG-DR OOR related work.

HCD has prepared a checklist for OOR Program applicants for 2020 disasters and has shared this checklist with the County Planning Department, Dixie Fire Collaborative, Rural Assistance Community Corporation, and disaster case managers. While the 2021 checklist should be very similar, HCD will update this checklist for 2021 disaster applicants, in particular for single family landlords.

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The OOR Program has reconstructed units in numerous wildfire-impacted counties from 2017 and 2018 wildfires, including, but not limited to, Shasta County, Mendocino County, Butte County, Sonoma County, Lake County, and Ventura County. Previous CDBG-DR Action Plans and Programs can be examined on the [HCD Disaster Recovery Action Plan web page](#).

HCD is working with an experienced nationwide construction management contractor [SLS Co.](#) HCD shares the master plan blueprints with external partners and can provide them to County Planning Department.

It is HCD's central mission to support the production and preservation of affordable homes for all Californians, and we aim to align CDBG-DR-funded programs with state housing law and pro-housing policies. Reconstructed units DO count towards Plumas County's RHNA production targets. Whether mitigation projects count towards Plumas County's Housing Element Quantified Objectives for rehabilitation/preservation depends on whether the project service area has quantifiable numbers on housing. Regardless of this data, it is important to include mitigation projects as part of Housing Element updates, because they describe actions to preserve housing units.

HCD will continue to keep open channels of communication with Plumas County, the Dixie Fire Collaborative, Disaster Case Managers, and other local stakeholders to ensure that CDBG-DR-funded programs meet the needs of disaster survivors and sustain viable project pipelines.

HCD Response to Clint Koble

HCD appreciates your thoughtful comments regarding the proposed Action Plan Amendment for the State of California's DR-4610 CDBG-DR allocation. HUD requires grantees to direct limited long-term recovery funds based on a rigorous data-driven unmet needs analysis and to direct resources towards the greatest unmet recovery needs. HCD's recovery needs analysis indicates that housing represents over 91 percent of unmet recovery need in the Most Impacted and Distressed (MID) area.

While these CDBG-DR-funded programs will not be used for economic development, HCD did award Plumas County with two grants from the annual CBDG program, including a \$250,000 grant for long-term recovery planning and \$750,000 for economic development in Greenville. A core value of long-term recovery planning is to identify priority projects and funding pathways for those projects. HCD is committed to coordinating the CDBG-DR funds with other federal and state resources to open up additional funding opportunities that support a resilient recovery in Plumas County. In addition, the state has several other economic revitalization programs offered through GoBiz or Workforce Development Agency. We encourage you to explore those grants to support recovery in Plumas county.

HCD additionally urges Plumas County and regional partners to apply to other state programs, including OPR's [Regional Resilience Grant Program](#), to support resilient infrastructure activities.

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Comment received from Butte County – August 8, 2023

August 8, 2023

Mona Akbar
Disaster Recovery and Response Unit
Dept. of Housing and Community Development
2020 West El Camino Avenue, Suite 200
Sacramento, CA 95833

RE: Public Comment from the County of Butte on the 2020 CDBG-DR Action Plan Amendment 3 (APA3)

Dear Ms. Akbar,

On October 29, 2021, the US Department of Housing and Urban Development (HUD) allocated \$231,203,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State to support California's unmet recovery needs related to FEMA Major Disaster Declarations DR-4558 and DR-4569, including the North Complex Fire. In June of 2023, the State of California Department of Housing and Community Development (HCD) posted changes to the 2020 CDBG-DR Action Plan in Amendment 3 to incorporate 2021 CDBG-DR allocation for areas impacted by 2021 wildfires (FEMA DR-4610).

In November of 2018, Butte County suffered the deadliest and most destructive wildfire in California's history (FEMA DR-4407). The Camp Fire resulted in the deaths of 85 civilians; the destruction of 14,500 structures, including 13,696 single-family homes and 276 multifamily structures; and damage to another 589 structures. In August of 2020, the North Complex Fire caused the deaths of 15 civilians and destroyed 2,445 additional structures (FEMA DR-4558).

Over the last several years, Butte County has undertaken extraordinary efforts to begin the recovery process from the Camp Fire and North Complex Fire including adoption of the General Plan 2040 Update and the Upper Ridge Community Plan to guide recovery, as well as building internal processes and systems to implement CDBG-DR funds as a result of the 2017 and 2018 fires. Through collaboration with HCD and the establishment of guiding policy documents approved by the Butte County Board of Supervisors, the County is a significant leader in locally guiding recovery from wildfire.

In prior public comment, the County has requested the State align 2020 Action Plan authority with the 2018 Action Plan whereby Butte County implements the CDBG-DR allocations in order to create continuity and consistency within recovery from layered disasters. The County continues to believe this approach is in the best interest of local recovery needs and priorities, and bears potential for the fullest restoration of our communities. However, there is mutual recognition that collaboration between the County and HCD sets these programs up

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for the highest degree of success. To that end, Butte County staff welcomed HCD staff to County offices on Monday, July 24th, to discuss the 2020 CDBG-DR MHP program as outlined in APA3. For the purposes of public comment on APA3, the County wishes to document local considerations for the successful implementation of these CDBG-DR programs under State authority:

1. The County brought to the attention of HCD staff that rebuild projects in the North Complex burn scar are sometimes stalled due to lack of legal lot determination. Title clearance and other surveying functions are often required prior to construction and can be burdensomely expensive and time consuming. County staff emphasizes that any pauses in forward progress in wildfire recovery and rebuilding can result in prolonged or permanent homelessness for vulnerable, high-risk populations. County staff encourages HCD to have full awareness of these underlying challenges so that mitigation funds can be proactively built into the Owner Occupied Reconstruction (OOR) program budgets to precede and prepare for a successful rebuilding process.
2. The County has identified other barriers to successful recovery in the North Complex burn scar: the need for hazardous tree removal and private roadway improvements. Tree removal and roadway improvements, when they are the financial responsibility of the property owner, can be prohibitively expensive and can deter and/or derail recovery. The County emphasizes that these issues, when not addressed, can prolong homelessness or displacement for fire survivors. The County recommends that HCD's OOR programs should take into account these barriers so they can be addressed financially by the State in tandem with the restoration of housing in the North Complex burn scar.
3. HCD is establishing the sequencing of the development process within the OOR and MHP programs in the consolidated 2020 and 2021 Action Plans. The County highly recommends conferring with the Butte County Development Services Department on a streamlined, efficient, appropriately sequenced process for rebuilding housing in the burn scar. The County has offered time and availability for these conversations, and has offered additional in-person meetings with HCD staff as needed to design a process that takes into account the County's expertise in land use planning and building.
4. County staff strongly requests that the case managers working with North Complex survivors through State-operated recovery programs receive trauma-informed training. Recovery programs, to be successful at the household level, must be tailored to household-level needs and must take into account unique and distinct individual needs.
5. The County recognizes that multi-family developments may not be the best fit for housing recovery in rural, fire-impacted areas that lack infrastructure to support density. The County highly recommends HCD take an innovative and adaptive approach to designing programs meant to restore affordable housing in fire-impacted communities. The approach could include scattered site single-family rental housing, ADUs built in advance of or during primary residential rebuilding, duplex/triplex/quad developments, adaptive recovery and reconstruction strategies that take into account the expertise of local government. Diverse housing stock is needed for the fullest recovery for North Complex survivors.

Turning to the CDBG-DR Multi-Family Housing Program (MHP), Butte County recognizes that HCD is taking the most fiscally responsible approach in applying these funds as "last in" on projects with identified gaps. The County has flagged numerous challenges for HCD staff in securing tax credits for these projects, and anticipates that these challenges may prohibit the successful use of CDBG-DR MHP funds as gap funds, delaying recovery.

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For example, evaluating the California Tax Credit alignment, the Northern California Region was so underfunded in the last round that no projects were funded. The County highly encourages HCD to work closely with multi-family developers in Butte County as well as the California Tax Credit Allocation Committee to understand and overcome these challenges.

These comments are consistent with input Butte County staff has presented to HCD throughout the development of the 2020 CDBG-DR Action Plan. These comments are shared in accordance with a strong desire to see the State, County, and fire-impacted communities succeed in recovery efforts. If there are any questions, please contact Tracy Davis, Program Development Manager, Butte County Administration, tdavis@buttecounty.net, 530.552.3350.

Thank you for your consideration.

Sincerely,



Máximo A. Pickett
Chief Administrative Officer

HCD Response to Maximo Pickett

Thank you for your public comment for the CDBG-DR 2020 Action Plan Amendment #3. HCD deeply values its partnership and ability to engage regularly with Butte County and looks forward to working together to address recovery strategies and overcome challenges around wildfire recovery in Butte County.

This action plan amendment incorporates CDBG-DR funding addressing unmet needs from the 2021 wildfire disaster (DR-4610) and does not modify existing programs for 2020 wildfire disaster unmet needs.

In June 2023, HUD approved HCD's 2020 CDBG-DR Action Plan Amendment #2, which outlined the scoring and eligibility criteria for projects, removes the mitigation funding component from new construction, and increases the maximum award for mitigation funding. APA #2 also requires that projects submit a letter of support from the local jurisdiction in which the project will be located, giving the local government ample opportunity to provide input and feedback above and beyond the normal planning entitlement approval process.

HCD looks forward to continued dialogue with Butte County on recovery efforts for 2017 and 2018 programs and appreciates twice per month as we have done since 2019.

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We appreciate your partnership and encourage jurisdictions to learn about the [MULTIFAMILY SUPER NOFA 2023 \(ca.gov\)](#) other HCD and state resources that may assist with the recovery efforts.