

California Department of Housing and Community Development

Community Development Block Grant

DRAFT Mitigation Action Plan Non-
Substantial Amendment 5

Effective Date: April 2025



V.1 – March 2025

Public Law 115-123, February 9, 2018

Public Law 116-20, June 2019

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I. Background and Summary of Changes

On January 6, 2021, the U.S. Department of Housing and Urban Development (HUD) released Federal Register Notice 86 FR 561 that allocated an additional \$64,907,000 of Community Development Block Grant Mitigation (CDBG-MIT) funds under Public Law 116-20 for the State of California. The additional funds are to support mitigation efforts in areas impacted by FEMA Disasters DR-4382 and DR-4407, covering Butte, Los Angeles, Ventura, Lake, and Shasta Counties, with no less than 50 percent of the funds expended in the most impacted distressed areas (MIDs).

HCD received approval for its prior 2017 CDBG-MIT Action Plan on June 4, 2020. The January 2021 Federal Register Notice states that grantees that have previously received CDBG-MIT allocations are able to amend their original Action Plan to create a single CDBG-MIT Action Plan covering both 2017 and 2018 disasters through a Substantial Action Plan Amendment.

HCD's substantial action amendment 2017 and 2018 CDBG-MIT Action Plan (MIT APA1) was submitted and approved by HUD in July of 2021. The 2017 and 2018 CDBG-MIT Action Plan Amendment two (MIT APA2) was submitted and approved by HUD in May of 2023. There were two subsequent non-substantial amendments done in December of 2023 and December of 2024.

The 2017 and 2018 CDBG-MIT Action Plan Amendment Five (MIT APA5) is a non-substantial amendment that moves unused funding from the Planning and Public Services Programs to the Resilient Infrastructure Program. This amendment will also change the current \$3 million threshold for substantial amendments to \$10 million.

Page numbers are provided with the proposed changes. Removed and replaced text updates have been made in the context of the named section within the action plan.

Summary of Changes:

Action Plan Amendment 5 (APA 5) will address changes in the following items:

- **Resilient Infrastructure Program:** Edits in this section is made to move the unused Planning and Public Services Program budget to address outstanding unmet need in the Resilient Infrastructure Program and adjust budget for local assistance amount.
- **Substantial Amendment:** Edits in this section provide an update on the threshold increase for substantial amendment from \$3 million to \$10 million.

II. Action Plan Amendments

The summary table shows the change in the budget that reallocates funds from the 2017 Planning and Public Services budgets to the 2017 Resilient Infrastructure Program. Additionally, budget adjustments were done to reflect the correct local assistance amounts.

REMOVE: STATE OF CALIFORNIA CDBG-MIT BUDGET

Program	2017 CDBG-MIT Funding	2018 CDBG-MIT Funding	Total CDBG-MIT Funding
CDBG-MIT Resilient Infrastructure Program	\$61,379,000	\$45,175,272	\$106,544,272
CDBG-MIT Planning and Public Services Program	\$20,779,050	\$12,286,378	\$33,065,428
Administration	\$4,410,950	\$3,245,350	\$7,656,300
Total CDBG-MIT Program Funds	\$88,219,000	\$64,907,000	\$153,126,000

REPLACE: STATE OF CALIFORNIA CDBG-MIT BUDGET

Program	2017 CDBG-MIT Funding	2018 CDBG-MIT Funding	Total CDBG-MIT Funding
CDBG-MIT Resilient Infrastructure Program	\$62,354,782	\$45,824,157.81	\$108,178,940
CDBG-MIT Planning and Public Services Program	\$19,803,308.00	\$11,637,492.20	\$31,440,800.20
Administration	\$4,410,950.00	\$3,245,350.00	\$7,656,300.00
Total CDBG-MIT Program Funds	\$86,569,000.00	\$60,707,000.00	\$147,276,000.01

IV. General Requirements

A. Substantial Amendment (Page 92)

Edits in this section provides an increase in the threshold for substantial amendments.

Remove:

Substantial amendments are characterized by either an addition or deletion of any CDBG-MIT funded program, any funding change greater than \$3 million of the CDBG-MIT allocation, or any change in the designated beneficiaries of the program.

Replace:

Substantial amendments are characterized by either an addition or deletion of any CDBG-MIT funded program, any funding change greater than \$10 million of the CDBG-MIT allocation, or any change in the designated beneficiaries of the program.

B. Mitigation Activities and Allocation of Funds (Page 104)

Remove:

The below budget represents the addition of the Owner-Occupied Rehabilitation and Reconstruction – Mitigation program for both 2017 and 2018 CDBG-MIT grants. Additionally, the budget adds in the allowable local assistance awards for each program. Local assistance awards represent the total available funds for awards to local governments for the specified program. Local assistance awards include the activity delivery costs incurred by the local governments as well as project costs.

TABLE 1: CDBG-MIT ALLOCATION OF FUNDS

2017 CDBG-MIT				
Program	Mitigation Need(s) Addressed	Program Allocation Under 115-123	Percentage of Total	Local Assistance Awards
Resilient Infrastructure Program (2017)	Wildfires, Flood, Earthquakes	\$ 61,379,000	70%	\$60,989,199.00
Round 1	--	\$ 43,080,000	49%	\$41,127,248.00
Round 2	--	\$ 18,299,000	21%	\$19,861,951.00
Resilience Planning and Public Services (2017)	Wildfires, Flood, Earthquakes	\$20,779,050	24%	\$19,730,710.00
Planning/Capacity Building	--	\$10,339,050	12%	\$9,833,927.68
Public Services	--	\$10,440,000	12%	\$9,896,782.32
Owner Occupied Rehabilitation and Reconstruction – MIT	Wildfires, Flood, Earthquakes	\$1,650,000	2%	N/A
Administration (2017)	--	\$4,410,950	5%	N/A
2018 CDBG-MIT				
Program	Mitigation Need(s) Addressed	Program Allocation Under 116-20	Percentage of Total	Local Assistance Awards
Resilient Infrastructure Program (2018)	Wildfires, Flood, Earthquakes	\$45,175,272	70%	\$40,131,868.44

2017 CDBG-MIT				
Program	Mitigation Need(s) Addressed	Program Allocation Under 115-123	Percentage of Total	Local Assistance Awards
Resilience Planning and Public Services (2018)	Wildfires, Flood, Earthquakes	\$12,286,378	19%	\$10,505,925.79
Planning/Capacity Building	--	\$4,271,143	7%	\$3,577,451.73
Public Services	--	\$8,015,235	12%	\$6,928,474.07
Owner Occupied Rehabilitation and Reconstruction – MIT	Wildfires, Flood, Earthquakes	\$4,200,000	6%	N/A
Administration (2018)	--	\$3,245,350	5%	\$3,245,350.00

Replace:

TABLE 2: CDBG-MIT ALLOCATION OF FUNDS

The below budget reallocates funds from the 2017 Planning and Public Services budgets to the 2017 Resilient Infrastructure Program budget and corrects local assistance amounts.

2017 CDBG-DR MIT				
Program	Mitigation Need(s) Addressed	Program Allocation Under 115-123	Percentage of Total	Local Assistance Awards
Resilient Infrastructure Program (2017)	Wildfires, Flood, Earthquakes	\$62,354,742	71%	\$62,354,742
Round 1	--	\$41,798,561	47%	\$41,798,561
Round 2	--	\$20,556,222	24%	\$20,556,222
Resilience Planning and Public Services (2017)	Wildfires, Flood, Earthquakes	\$19,803,268	22%	\$19,803,268
Planning/Capacity Building	--	\$9,566,810	11%	\$9,566,810
Public Services	--	\$10,236,458	11%	\$10,236,458
Owner Occupied Rehabilitation and Reconstruction – MIT	Wildfires, Flood, Earthquakes	1,650,000.00	1.9%	N/A
Administration (2017)	--	\$4,410,950.00	5.0%	N/A

2018 CDBG- MIT				
Program	Mitigation Need(s) Addressed	Program Allocation Under 116-20	Percentage of Total	Local Assistance Awards
Resilient Infrastructure Program	Wildfires, Flood, Earthquakes	\$45,842,157.81	71%	\$45,842,157.81
Resilience Planning and Public Services	Wildfires, Flood, Earthquakes	\$11,637,492.19	18%	\$11,637,492.19
Planning/Capacity Building	--	\$4,897,159.26	6%	\$4,897,159.26
Public Services	--	\$6,740,332.93	12%	\$6,740,332.93
Owner Occupied Rehabilitation and Reconstruction – MIT		\$4,200,000.00	6%	N/A
Administration	--	\$3,245,350.00	5.0%	\$3,245,350.00

A. Mitigation Programs (Page 105 APA1)

Resilient Infrastructure Program

a) Program Description

Remove:

This program provides local jurisdictions with an expansive and hands-on role in driving local community infrastructure needs that meet the definition of mitigation activities. The Resilient Infrastructure Program allocated \$61,379,000 of CDBG-MIT funding to assist local jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the updated 2017 Mitigation Needs Assessment. The additional release of 2018 CDBG-MIT funds will bring the total Resilient Infrastructure Program allocation to \$106,554,272.

Replace:

This program provides local jurisdictions with an expansive and hands-on role in driving local community infrastructure needs that meet the definition of mitigation activities. The Resilient Infrastructure Program allocated CDBG-MIT funding to assist local jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the updated 2017 Mitigation Needs Assessment. The additional release of 2018 CDBG-MIT funds bring the total Resilient Infrastructure Program allocation to \$108,178,940.

d) Delivery (Page 108)

Remove:

TABLE 3: PROPOSED FUNDING ROUNDS FOR 2017 MIT RESILIENT INFRASTRUCTURE ALLOCATIONS

Resilient Infrastructure Fund	Approximate Launch Date	Program Allocation
Round 1 - 2017	Early 2021	\$ 43,080,000
Round 2 - 2017	2024	\$ 18,299,000

Replace:

TABLE 4: PROPOSED FUNDING ROUNDS FOR 2017 MIT RESILIENT INFRASTRUCTURE ALLOCATIONS

Resilient Infrastructure Fund	Approximate Launch Date	Program Allocation
Round 1 - 2017	Early 2021	\$41,798,561
Round 2 - 2017	2025	\$20,556,222

2. Resilience Planning and Public Services (Page 114)

a) Program Description

Remove:

HCD allocated \$20,779,050 of 2017 CDBG-MIT funding to the Resilience Planning and Public Services program to address these needs. HCD allocated an additional \$12,286,378 of 2018 CDBG-MIT funding to the Resilient Planning and Public Services Program, for a total of \$33,065,428.

Replace:

HCD allocated \$19,803,268 of 2017 CDBG-MIT funding to the Resilience Planning and Public Services program to address these needs. HCD will allocate an additional \$11,637,492 of 2018 CDBG-MIT funding to the Resilient Planning and Public Services Program, for a total of \$31,440,760.