

**State of California
Action Plan for Disaster Recovery
from 2018 Disasters
Action Plan Amendment No. 7**

California Department of Housing and Community Development

Submitted to HUD: October 17, 2024

Approved by HUD: November 26, 2024

**For submission to the U.S. Department of Housing and Urban Development (HUD)
to fulfill requirements related to Community Development Block Grant Disaster Recovery
(CDBG-DR) Funds in Response to 2018 Disasters (FEMA DR-4382 and DR-4407)**

August 2024



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I. Background and Summary of Changes

On January 27, 2020, the U.S. Department of Housing and Urban Development (HUD) allocated \$1,017,399,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of California to support California's unmet recovery needs, related to the Federal Emergency Management Agency (FEMA) Major Disaster Declarations DR-4407 and DR4382 for the 2018 wildfire season. The funds were released in two allocations: Public Law 115-254 Unmet Needs allocation of \$491,816,000 and Public Law 116-20 Unmet Needs allocation of \$525,583,000.

HUD issued an approval of California's initial 18DR Action Plan on November 19, 2020 to HCD. The California Department of Housing and Community Development (HCD) manages CDBG-DR funds, in accordance with the goals and objectives set forth in the state's initial HUD-approved Action Plan for 2018 disasters ("18DR-Action Plan"). This is the seventh amendment to this Action Plan.

The 18DR-Action Plan amendment, number seven ("APA7"), is a substantial amendment; it proposes to close an existing program from the initial HUD-approved Action Plan and repurpose the funds to other programs to prioritize the areas with the greatest unmet need.

This amendment proposes to reallocate \$105,220,977.02 from the 2018 Owner Occupied Rehabilitation and Reconstruction Program (OOR) to the Disaster Recovery Multifamily Housing Program (DR-MHP), Homebuyer Assistance Program (HBA), Workforce Development, and Infrastructure Program. The OOR program will continue to serve eligible applicants who have submitted applications prior to the program application deadline. The remaining funds of the OOR program will be repurposed to as follows:

1. Reallocate \$87,550,273 from the OOR Program to DR-MHP.
2. Reallocate \$16,344,239.27 from the OOR Program to HBA.
3. Reallocate \$1,006,978.75 from the OOR Program to the Workforce Development Program.
4. Reallocate \$319,486.00 from the OOR Program to the Infrastructure Program.

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:

Action Plan Amendment 7 (APA 7) will address changes in the following items:

1. **Executive Summary, Proposed Use of CDBG-DR Funds:** Provides an update for the closure of the OOR program and budget adjustments to repurpose funds from the OOR program to other housing programs.
2. **Proposed Disaster Recovery Programs, Programs Overview:** This section updated for program distribution and budget changes as follows:
 - A. Owner Occupied Housing Rehabilitation and Reconstruction Program: This section updated to reflect the closure of the OOR program and reduce the budget by



- \$105,220,977.02. These funds will be reallocated to the DR-MHP Program, HBA Program, Workforce Development Program and Infrastructure Program.
- B. Multifamily Housing Program: Update to budget by relocating \$87,550,273 from the OOR Program and prioritize the areas with the greatest unmet need.
 - C. Infrastructure Program: Update to program budget. Reallocation of \$319,486.00 to the Infrastructure Program from the OOR Program for program activity delivery cost.
 - D. Workforce Development Program: Update to program budget. Reallocation of \$1,006,978.75 to the Workforce Development Program from the OOR Program for program activity delivery cost.

II. Action Plan Amendment

Text updates inserted or deleted made in the context of the section within the Action Plan are listed below.

1. Executive Summary

Remove: **FIGURE 1: 2018 CDBG-DR BUDGET SUMMARY – APA 6 BUDGET (Page 4 of APA 6)**

Program	Current Budget	APA 4 Change	APA 4 Budget	Local Assistance (APA 6 change)	Percentage
Total CDBG-DR Funds	\$1,017,399,000	N/A	\$1,017,399,000	N/A	100.0%
Housing	\$483,794,752	\$46,061,064.20	\$529,855,816.20	N/A	52.08%
Owner Occupied Rehabilitation and Reconstruction	\$207,107,638	\$15,275,984.19	\$222,383,622.19	\$199,033,341.84	21.86%
Homebuyer Assistance Program	\$26,000,000	\$332,686.65	\$26,332,686.65	\$23,567,754.56	2.59%
Multifamily/Small Rental Housing Program	\$250,687,114	\$30,452,393.36	\$281,139,507.36	\$250,687,114	27.63%
Infrastructure	\$347,428,488	\$41,920,212.80	\$389,348,700.80	\$347,441,663.22	38.27%
Local Infrastructure /FEMA Match	\$317,428,488	\$41,920,212.80	\$359,348,700.80	\$347,441,663.22	35.32%
Paradise Sewer A&E	\$30,000,000	\$--	\$30,000,000	N/A	2.95%
Economic Revitalization	\$40,695,960	\$5,846,412.33	\$46,542,372.33	N/A	4.57%
Workforce Development	\$40,695,960	\$5,846,412.33	\$46,542,372.33	\$40,694,942.60	4.57%
Planning	\$28,217,000	\$(27,434,839)	\$782,160.67	N/A	0.33%
Technical Assistance & Capacity Building	\$15,000,000	\$(15,000,000.00)	\$0		0.00%
Regional & Local Planning Activities	\$13,217,000	\$(12,434,839.33)	\$782,160.67	N/A	0.33%
State and Local Program Delivery	\$66,392,850	\$(66,392,850.00)	\$0	\$0	0.00%



Administration	\$50,869,950	\$ --	\$50,869,950	N/A	5.00%
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Replace: FIGURE 2: 2018 CDBG-DR BUDGET SUMMARY – PROPOSED APA 7 BUDGET

Program	Current Budget	APA 7 Change	APA 7 Budget	Percentage
Total CDBG-DR Funds	\$1,017,399,000.00	N/A	\$1,017,399,000.00	100.00%
Housing	\$529,855,816.20	\$(1,326,464,75)	\$528,529,351.45	51.95%
Owner-Occupied Rehabilitation and Reconstruction	\$222,383,622.19	\$(105,220,977.02)	\$117,162,645.17	11.52%
Homebuyer Assistance Program	\$26,332,686.65	\$16,344,239.27	\$42,676,925.92	4.19%
Multifamily/Small Rental Housing Program	\$281,139,507.36	\$87,550,273.00	\$368,689,780.36	36.24%
Infrastructure	\$389,348,700.80	\$319,486.00	\$389,668,186.80	38.30%
Local Infrastructure /FEMA Match	\$389,348,700.80	\$319,486.00	\$389,638,186.80	38.30%
Paradise Sewer A&E	\$30,000,000	N/A	\$30,000.00	n/a
Economic Revitalization	\$47,324,533.00	\$1,006,978.75	\$48,331,511.75	4.75%
Workforce Development	\$46,542,372.33	\$1,006,978.75	\$47,549,351.08	4.67%
Planning	\$782,160.67	N/A	\$782,160.67	0.08%
Regional & Local Planning Activities	\$782,160.67	N/A		0.0%
Administration	\$50,869,950	N/A	\$50,869,950	5.00%

5. Proposed Use Of CDBG-DR Funds (page 12)

Remove: The majority of funds will be allocated to housing recovery programs. This includes the state-run Owner Occupied Rehabilitation and Reconstruction Program which allows affected residents to apply directly to the state for grants up to \$200,000.

Replace: The Owner Occupied Rehabilitation Program, as originally articulated in the initial Action Plan as a stand-alone program will close for new applicants as of January 31, 2024. The program will continue to assist eligible applicants who submitted applications prior to the deadline.

2. Program Overviews (page 132)

A. Housing Recovery Programs

The following provides a summary of the section with language added for closing of a program, updating allocation methodology, and increasing allocation amounts.

B. Owner Occupied Housing Rehabilitation and Reconstruction (page 132)

This section updated to reflect the close of the Owner Occupied Housing Rehabilitation and Reconstruction Program to new applicants and reallocating remaining funds to other housing programs.

Add: After opening the program up to non-LMI survivors April 2023 and engaging multiple extensive rounds of outreach and coordination with local jurisdictions, the number of surveys and applications submitted to the OOR program decreased to an average of five (5) new surveys and one (1) submitted application per month, indicating low demand homeowner disaster recovery unmet need. Given the upcoming grant expenditure deadline, the significant time elapsed since the disaster, and the amount of remaining funds to be awarded, the program decided to close the program survey and application and conducted an unmet need analysis to reallocate the funds to other areas of unmet need.

The original unmet needs assessment identified 45% of the unmet need in housing and HCD allocated 52% of CDBG-DR funds to those unmet housing needs. This amendment maintains that level of funding in housing recovery programs to serve LMI renters and homeowners. This is achieved through the Multifamily housing program as well as the HBA program to assist with the purchase of a home outside of high fire areas.

Timeline (page 137)

Remove: The Owner Occupied Housing Rehabilitation and Reconstruction Program is expected to commence in quarter two of 2019 and remain operational through the end of the grant term.

Replace: The Owner Occupied Housing Rehabilitation and Reconstruction Program closed to new applicants effective January 31, 2024. The program will continue to assist eligible applicants who submitted applications prior to the deadline.

C. Multifamily Housing Program (page 131)

Add: This amendment proposes reallocate approximately \$87.5 million from OOR to DR-MHP to provide funds to impacted jurisdictions to support four to five previously approved and conditionally awarded projects that have a remaining funding gap, creating an additional 300-400 affordable housing units. The Method of Distribution for this funding is consistent with the original allocation methodology as the jurisdictions receiving additional funding are the same jurisdictions with the highest housing needs at the time of initial award.

Allocation Methodology (page 140)

Add: To prioritize the areas with the greatest unmet need, Action Plan Amendment 7 will redirect remaining funds from the OOR program to MHP to support the oversight and implementation of the current projects and support subrecipients in the MID area with projects that have already been underwritten by DR-MHP and conditionally approved, as follows:

DR-MHP Allocation in MID



Jurisdiction	Additional Allocation Amount (proposed allocation)
County of Butte	\$10,619,642
County of Butte	\$17,870,696
County of Butte	\$18,511,098
Town of Paradise	\$28,801,012
City of Clearlake	\$11,747,825
TOTAL	\$87,550,273

D. Homebuyer Assistance Program (page 143)

This section updated to reflect the increase in the allocation amount by \$16,344,239.27. With this increase in funding, the HBA program expects to serve an additional 45 LMI households with the purchase of a new home outside of a high or very high fire hazard severity zone.

Remove: Allocation Amount: \$25,000,000

Replace: Allocation Amount: \$42,676,925.93

E. Infrastructure Program (page 156)

This section updated to reflect the increase in the allocation amount by \$319,486.00 for Activity Delivery Cost (ADC). The program will provide direct funding to subrecipients to implement programs and project and HCD will provide oversight of the subrecipients to ensure efficient, effective, and compliant projects and programs are implemented. To ensure compliance, additional ADC resources are needed to provide technical assistance to local applicants to meet federal compliance requirements. The program budget was adjusted to increase the allocation amount to add the ADC.

Remove: 10. Unmet Needs

Funding stand-alone infrastructure projects that tie to DR-4382 or DR-4407 and the local portion of the non-federal share match on federal disaster-related grants in support of housing meet the requirement to address housing recovery needs first. Necessary infrastructure recovery must be complete before housing recovery is complete. The unmet needs assessment identified \$2,838,348,374 in unmet infrastructure recovery needs. Of the CDBG-DR funds received, \$389,348,700.80 will be used for Infrastructure Recovery Programs, which includes an estimated 38 percent of the total program allocation.

Figure 6: Unmet Infrastructure Recovery Need

CATEGORY	IDENTIFIED UNMET NEED	CDBG-DR FUNDED
Infrastructure Recovery	\$2,838,348,374	\$389,348,700.80



Replace: 10. Unmet Needs

Funding stand-alone infrastructure projects that tie to DR-4382 or DR-4407 and the local portion of the non-federal share match on federal disaster-related grants in support of housing meet the requirement to address housing recovery needs first. Necessary infrastructure recovery must be complete before housing recovery is complete. The unmet needs assessment identified \$2,838,348,374 in unmet infrastructure recovery needs. Of the CDBG-DR funds received, \$389,668,186.81 will be used for Infrastructure Recovery Programs, which includes an estimated 38 percent of the total program allocation. The budget increase will fund program activity delivery costs.

Figure 6: Unmet Infrastructure Recovery Need

CATEGORY	IDENTIFIED UNMET NEED	CDBG-DR FUNDED
Infrastructure Recovery	\$2,838,348,374	\$389,668,186.81

F. Workforce Development Program (page 157)

This section updated to reflect the increase in the allocation amount by \$1,006,978.75 for ADC. The Workforce program is a direct funding to subrecipients to implement training projects and HCD will provide oversight of the subrecipients to ensure efficient, effective, and compliant projects are implemented. To ensure compliance, additional ADC resources are needed to provide technical assistance to local applicants to meet federal compliance requirements. The program budget was adjusted to increase the allocation amount to add the ADC.

Remove: Allocation Amount - HCD is allocating \$46,542,372.33 to support workforce development in disaster impacted areas.

Replace: Allocation Amount - HCD is allocating \$47,549,351.09 to support workforce development in disaster impacted areas.

III. Public Comment

In keeping with the State’s Citizen Participation Plan, as articulated in Section 1 and 4, under

Publication, of the initial HUD-approved Action Plan, HCD published this proposed Action Plan Amendment, Number 7, on the CDBG-DR Action Plan webpage <https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notices-frns>) in English and Spanish.

2018 APA 7 will be available for public review and comment for thirty (30) days from August 26th, 2024, through 5:00 p.m. Pacific Standard Time on September 27th, 2024.

Comments can be submitted by the following methods:

- Electronic mail to (DisasterRecovery@hcd.ca.gov); or
- Post mail to Disaster Recovery Section, Attn: Mona Akbar, HCD, 651 Bannon Street, Suite 700 | Sacramento, CA 95811

If submitting comments via regular post mail, please factor delivery time into your mailing date. As above, all comments must be in writing and received by HCD by 5:00 p.m. Pacific Daylight Time on September 27th, 2024.

Residents who required a reasonable accommodation or other assistance to fully participate in the public comment process can request assistance by contacting the HCD Disaster Recovery Section via the same methods, listed above, for submission of public comments.

HCD considered all public comments received, timely and in writing, via e-mail, or delivered in person at official public hearings regarding this Action Plan Amendment, Number 7. HCD will make public comments available to citizens, public agencies, and other interested parties upon request.

A summary of all comments received, timely, is included in the final Substantial Action Plan Amendment, Number 7, submitted to HUD for approval. Following HUD approval, all comments received, timely during the public comment period will be noted and summarized in the final, comprehensive Action Plan, as amended and posted to HCD website.

Public Comment and Questions

These are the summary of public comments and questions received for the 2018 CDBG-DR Action Plan Amendment #7 during the public comment period beginning August 26th, 2024, through September 27th, 2024. All Comments were considered that were received during the meeting and emailed to HCD's disaster recovery email point. The questions and public comments are transcribed below for each meeting and answers from HCD and county staff. HCD will make public comments available to citizens, public agencies, and other interested parties upon request and post it to the HCD website.

Virtual Public Hearing

There were three virtual hearings held for public comment on September 10th in English and September 11th in Spanish and for Tribal Government. There we no public comments or questions asked during the Spanish Public Webinar held on September 11th at 6pm.

Below is a summary of public comment received during the English virtual hearings held for public Comment on September 10th, 2024.

1. Public Comment received from Seana O'Shaughnessy – President/CEO for Community Housing Improvement Program (CHIP Housing).

I appreciate the shift of the OOR dollar to MHP, but I am very disappointed

in how the State is going against the wishes of the local jurisdictions in the decisions that are being made, about which projects are being chosen. It goes against local control, which is the spirit of CDBG-DR. So, speaking to both the Town and County, as you know, we have projects in both of those, and you all have seemingly decided that CHIP's projects are the ones that shouldn't be funded. I mean, I know you're allowing the town to pick one. But speaking to the splitting. We've done some analysis of the scores and splitting the 28 million to the town of Paradise, would make both projects in incredibly stratospheric tiebreakers, which would almost guarantee. I know we're in a situation of highly competitive tax credit. Unusually competitive tax credits in the rural set aside. So, we would strongly encourage you to allow the town of Paradise to fund both projects, not pick one and also give us a full year of applications to move forward. So that's the Town speaking to the County potentially, the project in Chico will move forward with tax credits. It has the highest score which would allow all of the remaining projects to be funded. But regardless, telling the town the county which projects should be fully funded. It goes against the spirit of CDBG-DR. The county should be allowed to pick which projects to fully fund.

Those are my primary comments. But I do want to put on the public record that but I do want to put on the public record that pushing disaster, relief funds away from the communities of Paradise and Magalia is incredibly disappointing, because these are the communities that were impacted the greatest by this disaster. And when you think about the recovery for the people, that is where the housing is needed. And you said that one of the reasons was to where the highest housing needs are, and that's actually not what you're choosing to do by pushing more disaster, relief funds to the cities of Chico and Orville.

We will also submit a public comment letter. But I feel very disappointed. And I've enjoyed working with all of you for many years. The potential that you won't allow the local jurisdictions to really build the housing that is needed in our communities. I know you can't really respond. But I just wanted to put that out there and have it on the record, and we'll submit a letter. Thanks.

HCD Response: Thank you, Shauna. Yes, we appreciate your feedback. We appreciate your comment. Since you write the letter we'll respond to your letter.

Written Public Comment via Electronic Mail

The following questions were received via Electronic Mail (email) by HCD staff during the required 30-day public comment period for the 2018 Action Plan.

There were multiple public comment letters received below in support of Community Housing Improvement Program (CHIP Housing) and Butte County from:

- a. Bruce Yerman, Director of Camp Fire Collaborative, Paradise, CA on 9/17/24
- b. Cathryn Carkhuff, Executive Director - Home & Heart on 9/17/27.
- c. Amy Rohrer, Executive Director of Valley Contractors Exchange on 9/20/24.
- d. Erin Kennedy – Boys & Girls Clubs of North Valley on 9/23/24.
- e. Chelsea Irvine – Community & Economic Development Consultant, Butte County on 9/24/24.
- f. Nicole Bateman, Executive Director – Habitat for Humanity, Butte County on 9/24/24.
- g. Tom Taylor, Superintendent, Paradise Unified School District on 9/24/24.
- h. Leslie Johnson, President, Chico Housing Action Team on 9/24/24.
- i. Congressman Dough LaMalfa’s Office on 9/24/24.
- j. from Assemblyman James Gallagher – Chico, CA on 9/26/24.
- k. Butte County, Board of Supervisors on 9/26/24.
- l. Adam Thompson APT Housing on 9/27/24
- m. Chelsea Irvine, Community & Economic Development Consultant, Butte County
- n. Jen Goodlin, Rebuild Paradise Foundation
- o. Casey Taylor, Achieve Charter School of Paradise
- p. Mercy Housing California and CHIP
- q. Monica Nolan, CEO, Paradise Ridge Chamber of Commerce

The public comment letters stated to:

- Allow local jurisdictions to determine how the reallocated funds will be spent.
- Prioritize the Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartment projects.
- Provide a minimum of one-year extension for all 2018 CDBG-DR MHP projects currently in the pipeline.

HCD’s Response to the public comment letters above:

Thank you for submitting your valued comment to the Department of Housing and Community Development’s (HCD) Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan Amendment #7 (APA 7) for 2018 Disasters.

Action Plan Amendment #7 updates the status of the ReCoverCA Owner-Occupied Rehabilitation/Reconstruction (OOR) Program and redirects funds from OOR to the Disaster Recovery Multifamily Housing Program (DR-MHP) and Homebuyer Assistance Program (DR-HBA). Specifically, HCD reallocated approximately \$87.5 million to the DR-MHP, to provide an opportunity to fully fund projects that have already been conditionally approved by HCD’s grantees for the use of the funds.

HCD relied on the original Action Plan’s method of distribution to determine which subrecipients (jurisdictions) received additional funding in APA 7. The original action plan allocated 24.5% of the total DR-MHP funds to Butte County, 22.3% of total DR-MHP funds to Town of Paradise, and 3% of total DR-MHP funds to Lake County. There are not enough funds to fill the funding gaps for all conditionally approved projects; therefore, HCD then

ranked the conditionally approved projects based on the amount of funds needed to fill the funding gap per unit (total gap/total units) and the amount of other funds being leveraged for each project. HCD appreciates your support of the projects in your community. This amendment allows subrecipients to maintain their ability to determine which conditionally approved multifamily projects are funded with their allocation amount.

The 2018 CDBG-DR grant has an expenditure deadline of December 1, 2026. Multifamily housing projects must complete construction and lease-up to meet its expenditure deadline. HCD continues to work with all subrecipients and demonstrate progress towards maximizing CDBG-DR resources to construct as many units as possible.

Thank you again for your continued partnership and valued feedback that support our joint-efforts in recovering our communities across the state. Please do not hesitate to contact me (916) 862-1527 or Maziar.Movassaghi@hcd.ca.gov.

Some of the letters that were received for public comments are below:



Camp Fire
Collaborative
PO Box 1271
Paradise, CA 95967



September 17, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Dear Mr. Harney,

On behalf of the **Camp Fire Collaborative**, we strongly support reallocating 2018 CDBG-DR-OOR funding to the 2018 CDBG-DR-MHP program. We respectfully request that you prioritize funding for the three remaining multifamily housing projects in Paradise and Magalia, as these communities have the greatest need for replacement housing.

The Camp Fire Collaborative is a dedicated coalition formed after the devastating 2018 Camp Fire. Our organization has been instrumental in coordinating recovery efforts on the Ridge, assisting over 2,000 families in securing permanent housing solutions. We have been at the forefront of rebuilding and revitalizing our community through partnerships with public agencies, civic groups, faith-based organizations, and non-profit entities. Our mission is to facilitate a comprehensive and equitable recovery, ensuring that the most vulnerable residents have the opportunity to return home and rebuild their lives.

The 2018 Camp Fire devastated our region, resulting in the loss of over 14,000 housing units, primarily in the Town of Paradise and the Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing loss naturally occurred in affordable housing. Recovery has been slow and challenging, and the difficulties experienced within the Owner-Occupied Rehabilitation program are a testament to the obstacles families have faced in trying to rebuild their lives.

As the Camp Fire Collaborative, we have witnessed firsthand the struggles of displaced residents yearning to return to their communities. Our efforts on the Ridge have included coordinating disaster case management, facilitating donations management, providing spiritual and emotional wellness support, and addressing unmet needs. Despite these efforts, the lack of affordable housing remains the most significant barrier to a full recovery.

Unfortunately, the vast majority of federal funding for housing recovery—including both disaster tax credits and CDBG-DR-MHP funds—has been allocated to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring

Uniting, Strengthening, & Facilitating a healthy & vibrant recovery



September 17th, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

On behalf of Home & Heart, we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

Home & Heart is an organization in Butte County who supports older adults to age in place, increase affordable housing options and reduce isolation in older adults by facilitating homesharing. Our organization has been on the front lines of working with adults and seniors displaced by the Camp Fire, which took an existing housing crisis and made it worse. Projects like Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments are projects that will prevent hundreds of adults, seniors and their families on the brink of homelessness to have permanent stable housing, increase their financial stability and overall wellbeing.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local* communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.



We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

Cathryn Carkhuff

Cathryn Carkhuff
Director
Home & Heart
Cathryn@buttecountyhomeshare.com
www.buttecountyhomeshare.com



valley contractors exchange, inc.

951 East 8th Street • Chico, CA 95928 • (530) 343-1981 • Fax 343-3503
www.vceonline.com

September 20, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Valley Contractors Exchange, we express our support for the reallocation of 2018 CDBG-DR-
OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining
multifamily housing projects in Paradise and Magalia as these communities have the greatest need for
replacement housing.

As a member-based association representing over 350 contractors and industry professionals, Valley
Contractors Exchange is assisting in our regions recovery and recognize the importance of workforce housing,
which multifamily housing projects provide to our local workforce.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the
Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing
lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The
challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families
have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-
DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in
these neighboring cities has provided some relief, building replacement housing in the communities most
impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local*
communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges
faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to
support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

**We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds
will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge
Family Apartments; and 3) provide a minimum of a one-year extension for all 2018-CDBG-DR-MHP
projects in the pipeline.**

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents
who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the
substantial investments these developments will bring to our community to help drive economic growth and
bolster our community's quality of life.

Sincerely,



Amy Rohrer
Executive Director

Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho



September 23, 2024

Mona Akbar
Disaster Recovery Section
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Northern Valley Catholic Social Service, we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

Since 2018, NVCSS has continued to provide extension long term recovery Disaster Case Management services to the Paradise, Magalia and Concow communities. There are many survivors living in less than desirable conditions, often times still on burnt out properties with little to no resources to rebuild or relocate.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local* communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for all 2018-CDBG-DR-MHP projects in the pipeline.



Northern Valley
Catholic Social Service
INSPIRING HOPE & TRANSFORMING LIVES

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,



Erna Friedeberg, MPA
Northern Valley Catholic Social Service

Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho

September 17, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Boys & Girls Clubs of the North Valley we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

As the Director of Case Management, my team and I participated in recovery efforts and Disaster Case Management for 4 ½ years post Camp Fire. We rebuilt dozens of homes on the Ridge and housed hundreds of clients that were displaced from their previously affordable rentals on the day of Nov. 8, 2018. I can say without a doubt that CHIP housing on the Ridge has changed the lives of many of our clients and offered them safe and sustainable housing that they could afford on rather tight or fixed incomes. They are the ONLY low cost option that exists to support the community and not seek financial gain from residents (unlike the corporate tax deduction properties that have been built with similar funding in neighboring communities over the last few years). CHIP is the best option for individuals and families that have little to no opportunities to be housed at a rate that is sustainable for complex cases, disabled individuals, veterans, single income families, and the elderly. Further, we NEED these families and individuals to return to the Ridge as they are our *workforce*, our community partners, and the fabric of what makes the Ridge unique and wonderful.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local* communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

A handwritten signature in blue ink that reads 'Erin Kennedy'.

Erin Kennedy
Boys & Girls Clubs of the North Valley

Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho

September 24, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

As a Community & Economic Development Consultant with extensive experience in disaster recovery, economic development, and affordable housing, I would like to express my support for the reallocation of 2018 CDBG-DR-OOR funding to the 2018 CDBG-DR-MHP program and urge that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia, as these communities have the greatest need for replacement housing.

With nearly a decade in disaster recovery experience in the public, private, and nonprofit sectors, I have seen firsthand the long-term impact when recovery dollars work. The key to successful recovery from megafires like the Camp Fire are significant community partner support, project innovation, and funding and timeline flexibility.

The Camp Fire devastated Butte County, destroying nearly 14,000 homes, including much of the region's affordable housing. This has had a disproportionate impact on low-income residents, who are still struggling to find a way to return home nearly six years later.

The good news is that some challenges stalling the recovery can be addressed, including that of funding from CDBG-DR, which is specifically meant to support *local* communities' recovery post-disaster. With this proposed Action Plan amendment, the State can support a more equitable recovery in the region, by providing the lowest-income survivors with a choice.

I strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and more robust housing market and allow residents who have been waiting desperately for more options to return home. Thank you for your consideration. If you have any questions, please do not hesitate to contact me at (916) 207-3878.

Sincerely,



Chelsea Irvine
Community & Economic Development Consultant, Butte County
cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho

P.O. Box 3073
Chico, CA 95927
(530) 343-7423



September 17, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Habitat for Humanity of Butte County, we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

Habitat for Humanity of Butte County has made Paradise our focus area to help rebuild the community after the devastating Camp Fire. We know that Paradise had offered affordable homeownership opportunities and Habitat is committed to building 6-10 homes a year to assist with the recovery.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local* communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark

Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

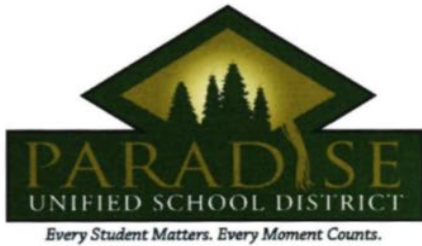
Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicole Bateman', written in a cursive style.

Nicole Bateman
Executive Director

Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho



Paradise Unified School District
6696 Clark Road
Paradise, California
Telephone: (530) 872-6400
Fax: (530) 872-6409
Website: www.pusdk12.org

Tom Taylor
Superintendent

David McCready
Assistant Superintendent
Business Services

September 17, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Paradise Unified School District, we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

Paradise Unified School District has seen increases in enrollment the last couple of years due to the continued construction within our community. However, there continues to be families who are doubled up and even a few still living in trailers. We believe this is due to the lack of low-income housing within our community.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local* communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments,



and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Taylor', written over a light blue background.

Tom Taylor



September 24, 2024

Mona Akbar
Disaster Recovery Section
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Chico Housing Action Team, I am writing to express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia, as these communities have the greatest need for replacement housing.

Our organization, CHAT, is one of the major housing providers in Chico for local residents who have struggled to secure housing. All of our clients have been homeless or on the verge of homelessness even before the Camp Fire, and of course, after the Camp Fire and other major fires, the need has become so much greater. We recognize that the regions of Paradise and Magalia are the areas most in need of ongoing funding for replacement housing.

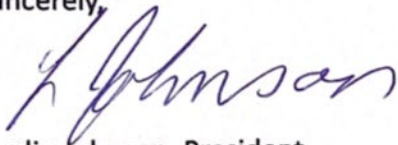
As you know, the 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

The vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local communities'* recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

We urge you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

A handwritten signature in blue ink that reads 'L. Johnson'.

Leslie Johnson, President
Chico Housing Action Team

Cc: Seana O'Shaughnessy

DOUG LAMALFA
1ST DISTRICT, CALIFORNIA
COMMITTEE ON AGRICULTURE
COMMITTEE ON
TRANSPORTATION AND INFRASTRUCTURE
COMMITTEE ON
NATURAL RESOURCES

Congress of the United States
House of Representatives
Washington, DC 20515-0501

September 24, 2024

Maziar Movassaghi, Chief Disaster Recovery Officer
California Housing and Community Development
651 Bannan Street
Sacramento, California 95811

WASHINGTON OFFICE:
400 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
Tel: (202) 225-3078
Fax: (202) 225-0862

CHICO DISTRICT OFFICE:
120 INDEPENDENCE CIRCLE
SUITE B
CHICO, CA 95973
Tel: (530) 343-1600
Fax: (530) 343-0240

REDDING DISTRICT OFFICE:
2885 CHILMICK CREEK ROAD
SUITE C
REDDING, CA 96002
Tel: (530) 223-6808
Fax: (530) 223-6897

YUBA CITY DISTRICT OFFICE:
1585 BUTTE HOUSE ROAD
SUITE D
YUBA CITY, CA 95903
Tel: (530) 445-6225

hlpr@lamalfa.house.gov

RE: Public Comment on the California 2018 Draft Disaster Action Plan Amendment 7 (APA7) of the 2018 CDBG-DR Action Plan

Dear Chief Movassaghi,

As a member of Congress, I represent California's first district where the devastating 2018 Camp Fire destroyed thousands of structures and took the lives of eighty-five of our residents. Six years later, the Butte County region in my district is still in the recovery process. On January 27, 2020, the United States Department of Housing and Urban Development (HUD) allocated \$1,017,399,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of California to support unmet recovery needs related to Major Disaster Declarations DR-4407 and DR-4382 for the 2018 wildfire season. Due to the Major Disaster Declaration for the Butte County Camp Fire occurring during that time, the County and the Town of Paradise have both received funding allocations to support their Multifamily Housing Programs (MHP). The County and the Town received their CDBG-DR allocations for MHP's in the amounts of \$71,185,473 and \$55,906,660 respectively.

On August 26, 2024, the California Department of Housing and Community Development (HCD) issued the DRAFT 2018 Action Plan Amendment 7 (APA7) proposing to shift unused funding allocations from the undersubscribed Owner-Occupied Reconstruction Program (OORP) to the MHP projects in both Butte County and the Town of Paradise in the amounts of \$47,001,436 and \$28,801,012 respectively. While it is unfortunate and disappointing that the Owner-Occupied Reconstruction Program was not more successful, I appreciate HCD's proposal to continue to dedicate these unused funds to the region's shovel-ready, MHP projects. As you are aware, recovery from these major disasters is a long and arduous process. It is important Congress' authorization to utilize these funds for the ongoing housing recovery efforts continues as there is still more work to be done.

Because the OOR funds were designated to help families rebuild and directly replace housing lost in the County and Town, prioritizing projects where housing was lost is the original intent of

Congress and the authorized use of the funding.

In order to best meet local needs of those whom have lost their homes, I suggest the local jurisdictions are best positioned to determine which of the remaining MHP projects would be the best recipient(s) of the redirected OOR funds and request that HCD not assign the funds to specific projects in amending the Master Standard Agreement, but instead provide local discretion to best meet local needs with limited resources.

This redirected OOR funding will be of great help to my constituents who are still in search of permanent housing. It is my pleasure to have this opportunity to share my thoughts with you and provide my support to the local jurisdictions. Please feel free to direct any questions to my staff, Laura Page, Senior Advisor, at laura.page@mail.house.gov or 530-343-1000.

Sincerely,

A handwritten signature in black ink that reads 'Doug LaMalfa'.

Doug LaMalfa
Member of Congress

cc: Acting Secretary Adrienne Todman, United States Housing and Urban Development
Brian Dahle, California State Senator
James Gallagher, California State Assemblyman
Andy Pickett, Butte County Chief Administrative Officer
Jim Goodwin, Town of Paradise Manager

State of California 2018 CDBG-DR Action Plan
Department of Housing and Community Development



STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0003
(916) 319-2003
FAX (916) 319-2103

E-MAIL
Assemblymember.Gallagher@assembly.ca.gov

Assembly
California Legislature



JAMES GALLAGHER
ASSEMBLY REPUBLICAN LEADER
ASSEMBLYMEMBER, THIRD DISTRICT

DISTRICT OFFICE
2060 TALBERT DRIVE, SUITE 110
CHICO, CA 95928
(530) 895-4217
FAX (530) 895-4219

September 26, 2024

Jenny Cho, Assistant Deputy Director
Disaster Recovery Branch
California Department of Housing and Community Development
651 Bannon Street
Sacramento, CA 95811

RE: 2018 Draft Disaster Action Plan Amendment 7 of the 2018 CDBG-DR Action Plan

Dear Ms. Cho,

On January 27, 2020, the U.S. Department of Housing and Urban Development (HUD) allocated \$1,017,399,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of California to support unmet recovery needs related to Major Disaster Declarations DR-4407 and DR4382 for the 2018 wildfire season. Due to the Camp Fire, Butte County has received a \$71,185,473 allocation of CDBG-DR funds and the Town of Paradise received a \$55,906,660 allocation to support the Multifamily Housing Program (MHP).

On August 26, 2024, the California Department of Housing and Community Development (HCD) issued the DRAFT 2018 Action Plan Amendment 7 (APA7) proposing to shift \$47,001,436 from the undersubscribed Owner-Occupied Reconstruction Program (OOR) to the Butte County and \$28,801,012 to the Town of Paradise MHP allocation. While it is unfortunate that the Owner-Occupied Reconstruction Program was not more successful, we appreciate HCD's proposal to continue to dedicate these funds to the region's shovel-ready, multi-family housing projects.

Because the OOR funds were designated to help families rebuild and directly replace housing lost in the Town and County, we believe prioritizing the three remaining projects in the towns of Paradise and Magalia aligns with the original intent of the funding.

To meet local needs, the local jurisdictions are best positioned to determine which of the remaining projects would be the best recipient(s) of the redirected OOR funds. It is for this reason I ask that HCD not assign the funds to specific projects in amending the Master Standard Agreement, but instead provide local discretion to best meet local needs with limited resources.

Sincerely,

JAMES GALLAGHER
Assemblymember, Third District



Adam Thompson
6055 Timber Ridge Drive
Magalia, CA 95954
(916) 468-6443
adam@apthousingca.com

September 27, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of APT Housing California, I express my support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

For the past twenty-two years, I've had the privilege of assisting developers in California with the construction, acquisition, and rehabilitation of low-income multifamily projects. I moved my family and business to Paradise in 2021 and have been welcomed and embraced by this wonderful community. The need for more housing, specifically low-income, in Paradise and Magalia is dire to the ongoing recovery efforts from 2018 Camp Fire. More housing equals more businesses, jobs, opportunities, growth, and strengthened support for the health of this incredible and resilient community.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

Sadly, the vast majority of federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support *local* communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

I strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) provide a minimum of a one-year extension for *all* 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

Adam Thompson

Adam Thompson,
Principal

Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho

Below are the public comment letters received via email for support of CHIP Housing from four residents of Paradise Community Village (PCV) on 9/25/24 and Mimi Brown, Individual Citizen.

To Whom it Concerns,

This is a statement on why low income is a very essential resource for our family needs. Without it we would not be able to afford to live anywhere in California for a three bedroom as reasonable as it is here with the sole income (of minimum wage) and a family of six, normal prices, without the help of low income, the amount is triple the amount, even quadruple the amount in certain areas.

We would also be forced to live with family and further be in debt. This resource that chip has for our family is a life-line. without it we are in the streets.

The Moncayo Family

To whom this may concern:

I believe that low income housing is such a blessing to our community. There is a lot of people who rely on this type of housing, if it wasn't here I believe there would be a lot more homelessness than there already is. There are many families who work hard and still have a tough time making ends meet every month. The low income housing gives low income families the chance to thrive and strive. I myself and my family of 5 rely on low income housing to live. Our three boys feel safe and happy in our PCV community. They are thriving in school and it gives families like us an opportunity that we are forever grateful for.

Sincerely
PCV Resident.

Sept. 24, 2024

To Whom it may Concern,

I am expressing my concerns on an issue that is extremely close to my heart.

I have lived in Paradise, Ca. for 57 years. My Grandfather, Robert Leo Smith settled here in 1948. My mother, Goldie Eckert came with my Grandfather, same year.

I was 2 yrs. old when my mother brought me to Paradise, 1959. My daughter, Kyla was born at Feather River Hospital, Paradise, 1985. My son, Tyler Born, 1989 same Hospital. My daughter, had my first grandchild, Feather River Hospital, 2009. My second grandchild, 2011, 5 generations from Paradise, Ca!

In 2018, Paradise had the most devastating fire. The Camp fire! at that moment, I lost everything!

We were not allowed to come back to our town for approx. 6 months! When we were finally returned

our Crime Rate Here in Paradise
is Very Low, currently, But,
I Can see it increasing in
the future, if people are
struggling, every day, just
to put Food on their Table, Gas
prices, private Rent payments,
and No where to Live.

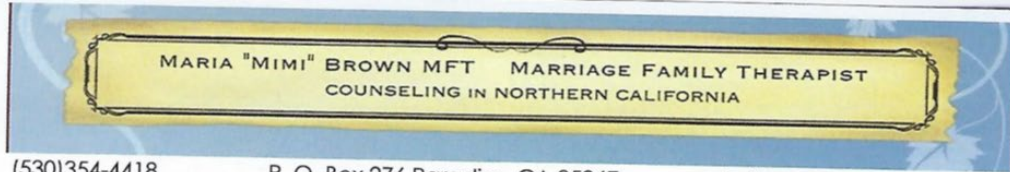
Please Consider, Keeping Paradise
a Safe, Peaceful, Beautiful,
Community to Live,
and a "Place to Call Home."

Thank you,
Joyce Barker

To Whom it May Concern;

We really need low income housing in Paradise. There are many people that need it here. I'm just one of the lucky ones that have a nice low income apt. here.

Janet Rhodes



(530)354-4418

P. O. Box 276 Paradise, CA 95967

mimibrownmft@gmail.com

September 16, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development
Re: 2018 CDBG-DR Substantial Action Plan Amendment 7
Via Email: DisasterRecovery@hcd.ca.gov

On behalf of Maria 'Mimi' Brown MFT office, we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

Personally, at least a dozen of my middle aged friends (empty nesters) and myself are awaiting Lakeridge to open to live there. I have a number of friends in Chico, Oroville and elsewhere, who hate where they are and want to move into a senior or family apartment or condo complex, preferably in Magalia, if not, Paradise.

The 2018 Camp Fire devastated our region, bringing the loss of over 14,000 housing units, primarily in the Town of Paradise and Butte County communities of Magalia, Concow, and Yankee Hill. Much of the housing lost was naturally occurring affordable housing. Recovery has been extremely slow and challenging. The challenges experienced within the Owner-Occupied Rehab program are a testament to the difficulty families have faced trying to recover.

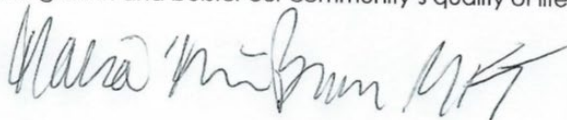
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We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and **Lakeridge** Family Apartments; and 3) provide a minimum of a one-year extension for all 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

Maria "Mimi" Brown MFT
Lic No 50470



Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho

HCD's Response to the four residents of Paradise Community Village and Mimi Brown, individual citizen:

Thank you for submitting your valued comment to the Department of Housing and Community Development's (HCD) Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan Amendment #7 (APA 7) for 2018 Disasters.

Action Plan Amendment #7 continues HCD’s support of post disaster housing recovery needs. Specifically, this amendment updates the status of the ReCoverCA Owner-Occupied Rehabilitation/Reconstruction (OOR) Program and redirects \$87.5 million funds from OOR to the Disaster Recovery Multifamily Housing Program (DR-MHP) and Homebuyer Assistance Program (DR-HBA). This amendment allows subrecipients to maintain their ability to determine which conditionally approved multifamily projects are funded with their allocation amount.

There are not enough funds to fill the funding gaps for all conditionally approved projects; therefore, HCD then ranked the conditionally approved projects based on the amount of funds needed to fill the funding gap per unit (total gap/total units) and the amount of other funds being leveraged for each project. HCD continues to work with all subrecipients and demonstrate progress towards maximizing CDBG-DR resources to construct as many units as possible.

Thank you again for your continued engagement with CDBG-DR program and our joint-efforts in post disaster recovery. HCD appreciates your support of the projects in your community.

Public Comment email letter received from Town of Paradise on 9/25/24.



Town of Paradise
5555 Skyway
Paradise, CA
95969
(530) 872-6291

September 23, 2024

Joe Harney, Section Chief
Housing Programs, Disaster Recovery Branch
California Department of Housing and Community Development

Re: 2018 CDBG-DR Substantial Action Plan Amendment 7

Via Email: DisasterRecovery@hcd.ca.gov

On behalf of the Town of Paradise, we express our support for the reallocation of 2018 CDBG-DR-OOR funding to 2018 CDBG-DR-MHP program and ask that you prioritize funding the three remaining multifamily housing projects in Paradise and Magalia as these communities have the greatest need for replacement housing.

The 2018 Camp Fire devastated our Town, bringing the loss of over 12,000 housing units and displacing tens of thousands of residents. The Town's population decreased by nearly 90% overnight; a shift that has impacted the community in every aspect. The Town has made tremendous efforts and progress in rebuilding our community, but recovery continues to be a challenging process. We believe that continued support and collaboration with HCD will be essential to replacing much needed affordable housing.

Most of the federal funding for housing recovery, including both disaster tax credits and CDBG-DR-MHP, has gone to the nearby cities of Chico and Oroville. While increasing the availability of affordable housing in these neighboring cities has provided some relief, building replacement housing in the communities most impacted by disaster remains our greatest need. The purpose of CDBG-DR funding is to support local communities' recovery post-disaster. Access to affordable housing has been one of the greatest challenges faced by low-income disaster survivors. With this Action Plan amendment, the State has an opportunity to support a more equitable recovery in our region, by providing the lowest-income survivors with a choice.

We strongly encourage you to: 1) allow the local jurisdictions to determine how the reallocated funds will be spent; 2) prioritize Cypress Senior Apartments, Clark Road Family Apartments, and Lakeridge Family Apartments; and 3) provide a minimum of a one-year extension for all 2018-CDBG-DR-MHP projects in the pipeline.

Increasing affordable housing options will lead to a healthier and balanced housing market and allow residents who have been waiting desperately for more options to return

to Paradise and Magalia. We welcome the substantial investments these developments will bring to our community to help drive economic growth and bolster our community's quality of life.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Goodwin', written over a light blue horizontal line.

James Goodwin,
Town Manager

Cc: Seana O'Shaughnessy, Stacy Rodgers, Maziar Movassaghi, and Jenny Cho



Butte County Board of Supervisors

25 County Center Drive, Suite 200 | T: 530.552.3300 | www.buttecounty.net/administrati
Oroville, California 95965 | F: 530.538.7120

Members of the Board
Bill Connelly | Peter Diefze | Tom Ritter | Tod Kimmelschue | Doug Teeter

September 24, 2024

Mona Akbar, Disaster Recovery Section
Dept. of Housing and Community Development
651 Bannon Street, Suite 700
Sacramento, CA 95811

RE: Public Comment from the County of Butte on the 2018 Draft Disaster Action Plan Amendment 7 (APA7) of the 2018 CDBG-DR Action Plan

Dear Ms. Akbar,

On January 27, 2020, the U.S. Department of Housing and Urban Development (HUD) allocated \$1,017,399,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of California to support unmet recovery needs related to Major Disaster Declarations DR-4407 and DR4382 for the 2018 wildfire season. Due to the Camp Fire, Butte County has received a \$71,185,473 allocation of CDBG-DR funds to support the Multifamily Housing Program (MHP) and has issued nine conditional commitment letters to multifamily housing projects. Five projects are either complete or under construction, and four have yet to receive tax credit awards to complete their funding needs, but have met all environmental requirements.

On August 26, 2024, the California Department of Housing and Community Development (HCD) issued the DRAFT 2018 Action Plan Amendment 7 (APA7) proposing to shift \$47,001,436 from the undersubscribed Owner Occupied Reconstruction Program to the Butte County MHP allocation. While it is unfortunate that the Owner Occupied Reconstruction Program was not more successful, Butte County appreciates HCD's proposal to continue to dedicate these funds to Butte County's shovel-ready housing projects. However, in order to best meet local needs we believe the County is best positioned to determine which of the four projects would be the best recipient of the redirected funds and request that HCD not assign the funds to specific projects in amending the Master Standard Agreement, but instead provide local discretion to best meet local needs with limited resources.

These comments are consistent with concerns Butte County has presented to HCD throughout the development of the 2018 CDBG-DR Action Plan and all subsequent amendments. If there are any questions, please contact Katie Simmons, Deputy Chief Administrative Officer, Butte County Administration, ksimmons@buttecounty.net, 530.552.3338. Thank you for your consideration.

Sincerely,



Tod Kimmelschue, Chair
Butte County Board of Supervisors

There were four public comment letters received below in support of Lakeport Project CA from:

- a. Chris Dart, President of Danco Communities on 9/26/24.
- b. Chris Westlake, Westlake Consulting LLC, on 9/26/24.
- c. Kevin Ingram, City Manager, City of Lakeport on 9/27/24.
- d. Peter Schellinger, Managing Member, Waterstone Residential, LLC Communities on 9/26/24.

The letters stated to:

- Prioritize project based on tie-breaker scores from tax credits, if project awarded tax-credit then ,should not be eligible for CDBG-DR, redirect to next project
- Consider Parkside Apartments since the project did not receive tax-credit.
- Clearlake project did not apply for tax credit, the funds should go to Parkside Apartment.
- Projects selected to receive additional CDBG-DR funds from this Action Plan subsequently receive a tax credit, should not be eligible for additional .
- HCD should rank the projects based on their tie breaker scores with the latest round of 9% tax credits.
- Funding awarded to the highest scoring project with remaining available funds being awarded to the next project in Waterfall allocation.
- Remaining funds from Malibu, Calabasas and Agoura Hills should be used for Parkside Apartment project.
- Rank projects based on their tie breaker scores with 9% tax credits, since all DR projects originally contemplated tax credit equity in their funding sources.

HCD's Response to the letters for the comments above:

Thank you for submitting your valued comment to the Department of Housing and Community Development's (HCD) Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan Amendment #7 (APA 7) for 2018 Disasters.

Action Plan Amendment #7 updates the status of the ReCoverCA Owner-Occupied Rehabilitation/Reconstruction (OOR) Program and redirects funds from OOR to the Disaster Recovery Multifamily Housing Program (DR-MHP) and Homebuyer Assistance Program (DR-HBA). Specifically, HCD reallocated approximately \$87.5 million to the DR-MHP, to provide an opportunity to fully fund projects that have already been conditionally approved by HCD's grantees for the use of the funds.

HCD relied on the original Action Plan's method of distribution to determine which subrecipients (jurisdictions) received additional funding in APA 7. The original action plan allocated 24.5% of the total DR-MHP funds to Butte County, 22.3% of total DR-MHP funds to Town of Paradise, and 3% of total DR-MHP funds to Lake County. Low-

Income Housing Tax Credits or Bonds are not required for a project to be eligible to receive DR-MHP funding. There are not enough funds to fill the funding gaps for all conditionally approved projects; therefore, HCD then ranked the conditionally approved projects based on the amount of funds needed to fill the funding gap per unit (total gap/total units) and the amount of other funds being leveraged for each project. HCD appreciates your support of the projects in your community. This amendment allows subrecipients to maintain their ability to determine which conditionally approved multifamily projects are funded with their allocation amount.

The 2018 CDBG-DR grant has an expenditure deadline of December 1, 2026. Multifamily housing projects must complete construction and lease-up to meet its expenditure deadline. HCD continues to work with all subrecipients and demonstrate progress towards maximizing CDBG-DR resources to construct as many units as possible.

Thank you again for your continued partnership and valued feedback that support our joint-efforts in recovering our communities across the state. Please do not hesitate to contact me (916) 862-1527 or Maziar.Movassaghi@hcd.ca.gov.

Below are the public comment letters received via email for support of Lakeport project.

DANCO

THE DANCO GROUP OF COMPANIES

Danco Communities

Phone: (707) 822-9000
Fax: (707) 822-9596
www.danco-eroou.com

5251 Ericson Way
Arcata, CA 95521

September 26, 2024

Mona Akbar
Disaster Recovery and Response Unit Specialist
Housing & Community Development
651 Bannon Street, Ste 700 | Sacramento, CA 95811

RE: HCD Action Plan Amendment No.7 (2018 DR – MHP)

We would greatly appreciate HCD's consideration of the following feedback regarding the referenced Action Plan as it finalizes the distribution of funds.

HCD should prioritize projects based on their tie-breaker scores from the most recent round of 9% tax credits. Consistent with other HCD initiatives, funding should be awarded to the top-scoring project. If a CDBG-DR project selected for additional funding from this Action Plan receives a tax credit allocation in 2024, it should no longer be eligible for further CDBG-DR funds. In that case, HCD should redirect those funds to the next eligible CDBG-DR project.

While Parkside Apartments has consistently ranked as the highest-scoring project for both 9% and 4% CDBG-DR funding in recent rounds, it has yet to receive an award from TCAC. Therefore, we urge that this development be considered for funding under this Action Plan Amendment.

It's also important to note that the latest round of tax credits, the second 4% round, closed on August 27, 2024, with Parkside Apartments being the only CDBG-DR project to apply for these credits. Additionally, the Clearlake allocation is directed toward a project that did not apply for tax credits in 2024. Given the ongoing unmet need in Lake County, particularly in Lakeport, we propose an allocation of \$17,000,000 to fully fund Parkside Apartments.

Thank you once again for considering this input and for your continued support of the Parkside Apartments DR-MHP project in Lakeport, California.

Best regards,



Chris Dart

President of Danco Communities



September 26, 2024

Mona Akbar
Disaster Recovery and Response Unit Specialist
Housing & Community Development
651 Bannon Street, Ste 700 | Sacramento, CA 95811

RE: HCD Action Plan Amendment No.7 (2018 DR – MHP)

It would be greatly appreciated if HCD takes into consideration the following comments related to the above-referenced Action Plan when finalizing the regulations and guidelines for the allocation of funds:

General Comments

- Should a CDBG-DR project that is selected to receive additional CDBG-DR funds from this Action Plan subsequently receive a tax credit allocation in 2024, that project should not be eligible for additional CDBG-DR funds and HCD shall reallocate those funds to the next eligible CDBG-DR project.
- HCD should rank the projects based on their tie breaker scores with the latest round of 9% tax credits, since all DR projects originally contemplated tax credit equity in their funding sources. Similar to other HCD programs, funding shall be awarded to the highest scoring project with remaining available funds being awarded to the next project in the waterfall allocation.

Project Specific Comments

- Although Parkside Apartments has been the highest scoring tax credit project for both 9% and 4% CDBG-DR projects in the last several rounds, it still hasn't received an award from TCAC. As such, this development should be considered for funding with this Action Plan Amendment.
- The most recent round of tax credits is the 4% second round that closed August 27, 2024. The only CDBG-DR project that applied for credits was Parkside Apartments.
- It should be noted that the Clearlake allocation is going to a project that hasn't applied for tax credits in 2024. Not sure if there is a time constraint for this development.
- There is still unmet need in Lake County, especially Lakeport, and as such there should be an allocation to Lakeport of \$17,000,000 to fully fund Parkside Apartments.

Thanks again for your consideration and continued support of the Parkside Apartments DR-MHP project in Lakeport, California.

Best regards,



Peter Schellinger
Managing Member

Westlake Consulting, LLC

September 26, 2024

Mona Akbar
Disaster Recovery and Response Unit Specialist
California Department of Housing & Community Development
651 Bannon Street, Suite 700
Sacramento, CA 95811

RE: HCD Action Plan Amendment No.7 (2018 DR – MHP)

Good Afternoon,

In response to the California Department of Housing and Community Development (HCD) Action Plan #7 (2018 DR-MHP), I want to submit the following comments as they relate to the DR-Multifamily Housing program component. As a former Deputy Director of HCD, I know there is a lot of comments that come in for analysis, but I wanted to keep mine brief and to the point. I am the finance consultant on a CDBG-DR project in Lakeport (Parkside Apartments) that has been trying to get awarded extremely high tie breaker scores in multiple tax credit rounds this year. This Action Plan could make a difference and fund this project similar to what has been done in the Accelerator program at HCD. I would appreciate it if HCD takes into consideration the following comments related to the above-referenced Action Plan when finalizing the regulations and guidelines for the re-allocation of funds:

General Comments:

- Should a CDBG-DR project that is selected to receive additional CDBG-DR funds from this Action Plan subsequently receive a tax credit allocation in 2024, that project should not be eligible for additional CDBG-DR funds and HCD shall reallocate those funds to the next eligible CDBG-DR project.
- HCD should rank the projects based on their tie breaker scores with the latest round of 9% tax credits, since all DR projects originally contemplated tax credit equity in their funding sources. Similar to other HCD programs, funding shall be awarded to the highest scoring project with remaining available funds being awarded to the next project in the waterfall allocation.

Project-Specific Comments:

- From the Round 1 CDBG-DR NOFA that closed on September 6, 2024, there was \$26,699,371 set aside for Malibu, Calabasas, and Agoura Hills. I believe that there have been no applications submitted for this set aside, and since it was part of the 2018 disasters, then those funds can be swept into the Multifamily Housing part and be used to fully fund the Lakeport development of Parkside Apartments.
- HCD should rank the projects based on their tie breaker scores with the latest round of 9% tax credits, since all DR projects originally contemplated tax credit equity in their funding sources. Similar to other HCD programs, funding shall be awarded to the highest scoring project with remaining available funds being awarded to the next project in the waterfall allocation. Below is a snapshot with the CDBG-DR projects highlighted in yellow:



Westlake Consulting, LLC

CTGIC NUMBER	PROJECT NAME	HOUSING TYP	ANNUAL FEDERAL CREDIT REQUESTS	TOTAL STATE CREDIT REQUESTS	POINTS SELF SCORE TOTAL	TIE BREAKER SELF SCORE	SET ASIDE	CITY	COUNTY
CA-24-07	Summer Oaks	Large Family	\$1,533,000	\$1,891,188	109.38	77.70%	Rural Apartment (HOME)	San Jose	Alameda
CA-24-111	Parkside Apartments	Large Family (H)	\$1,713,181	\$1	109.38	75.88%	Rural Apartment (CDBG-DR)	Lakeport	Lake
CA-24-100	Oak Road Apartments	Large Family (H)	\$2,500,000	\$1,331,321	109.38	66.90%	Rural Apartment (CDBG-DR)	Parkside	Butte
CA-24-101	Oak Road Apartments Phase II	Large Family	\$2,500,000	\$1,331,321	109.38	66.90%	Rural Apartment (CDBG-DR)	Parkside	Butte
CA-24-060	Union Street Senior Apartments	Seniors	\$2,081,728	\$1	109.38	66.01%	Rural Apartment (CDBG-DR)	Troala	Butte
CA-24-061	Leaville Oaks Apartments	Large Family	\$2,500,000	\$1	109.38	66.00%	Rural Apartment (CDBG-DR)	Magala	Butte
CA-24-050	Brookside Senior Village	Seniors	\$2,500,000	\$1,707,618	109.38	64.52%	Rural Apartment (HOME)	Palmdale	San Diego
CA-24-102	Cypress Lake Senior Apartments	Seniors	\$2,328,712	\$1,748,074	109.38	64.10%	Rural Apartment (CDBG-DR)	Parkside	Butte
CA-24-073	Carolina Pines Apartments	Large Family	\$1,080,218	\$1,024,001	109.38	49.55%	Rural Apartment (HOME)	Carleton	San Luis Obispo
CA-24-023	Lone Oak Senior Apartments I	Seniors	\$1,421,540	\$1	109.38	44.20%	Rural Apartment (HOME)	Palm Valley	Tulare
CA-24-103	Bainbridge Senior Apartments	Seniors	\$1,948,430	\$1	109.38	37.18%	Rural Apartment (CDBG-DR)	Lakeport	Lake
CA-24-021	Dorland View Apartments II	Large Family	\$1,624,934	\$461,038	109.38	34.21%	Rural Apartment (CDBG-DR)	Shasta	Butte

- Although Parkside Apartments has been the highest scoring tax credit project for both 9% and 4% CDBG-DR projects in the last several rounds, it still hasn't received an award from TCAC. As such, this development should be considered for funding with this Action Plan Amendment.
- The most recent round of tax credits is the 4% second round that closed August 27, 2024. The only CDBG-DR project that applied for credits was Parkside Apartments.
- It should be noted that the Clearlake allocation is going to a project that hasn't applied for tax credits in 2024. Not sure if there is a time constraint for this development.
- There is still unmet need in Lake County, especially Lakeport, and as such there should be an allocation to Lakeport of \$17,000,000 to fully fund Parkside Apartments.

Thanks again for your consideration and continued support of the Parkside Apartments DR-MHP project in Lakeport, California.

Sincerely,

 Chris Westlake
 Owner/Consultant

Public Comment Email letter received from Kevin Ingram - City Manager, City of Lakeport on 9/27/24.

CITY OF LAKEPORT

*Over 130 years of community
pride, progress and service*



September 27, 2024

Action Plan Amendment, Number 7, on the CDBG-DR Plan Webpage
Electronically Submitted--(DisasterRecovery@hcd.ca.gov)

RE: City of Lakeport Comments to State of California Action Plan for Disaster Recovery from 2018 Disasters Action Plan Amendment No. 7

Dear California Department of Housing and Community Development,

I am submitting this public comment regarding Action Plan Amendment Number 7, acknowledging that the official public comment period ended on September 26, 2024, at 5:00 PM. However, the Lakeport City Council met on September 26, 2024, at 6:00 PM and unanimously approved both a request for an extension of the comment period for CDBG-DR and the reallocation of \$2.4 million of CDBG-DR funds to the Parkside Apartments project. We respectfully ask that this input be considered as part of the broader discussion around the allocation of Community Development Block Grant Disaster Recovery (CDBG-DR) funds.

I would like to raise several important points for consideration regarding the allocation and reallocation of these funds:

- From the Round 1 CDBG-DR Notice of Funding Availability (NOFA), which closed on September 6, 2024, \$26,699,371 was set aside for the cities of Malibu, Calabasas, and Agoura Hills. It is my understanding that no applications have been submitted for this set-aside. As this funding is linked to the 2018 disasters, it is our belief that these funds should be redirected to the Multifamily Housing program and utilized to fully fund the Parkside Apartments development in Lakeport.
- In any instance where a CDBG-DR project selected to receive additional funds from this Action Plan subsequently secures a tax credit allocation in 2024, we propose that the project should become ineligible for additional CDBG-DR funding. HCD should reallocate these funds to the next eligible CDBG-DR project, ensuring that financial resources are distributed where they are most needed.
- We recommend that HCD rank projects based on their tie-breaker scores from the latest round of 9% tax credits. Since all CDBG-DR projects initially contemplated the inclusion of tax credit equity in their financial plans, funding should be awarded to the highest-scoring projects, with remaining funds allocated to subsequent projects following a

*City Hall • 225 Park Street • Lakeport, CA 95453
(707) 263-5615 ext. 104 • kingram@cityoflakeport.com*