



COMMUNITY DEVELOPMENT BLOCK GRANT - DISASTER RECOVERY ACTION PLAN 2023



California Department of Housing and
Community Development

Submitted to HUD April 4, 2024
Approved by HUD XXX X, 2024



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1. Executive Summary

Overview.

The U.S. Department of Housing and Urban Development (HUD) announced that the State of California will receive \$115,022,000 in funding to support long-term recovery efforts following [FEMA DR-4683](#) through the California Department of Housing and Community Development (HCD). Community Development Block Grant- Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in California in the five most impacted and distressed counties.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$115,022,000 in CDBG-DR funds to the State of California in response to FEMA DR-4683, through the publication of the Federal Register, *Vol. 88, (88 FR 82982) November 27, 2023*. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2023 (division B of Public Law 117-43) and allocates remaining funding made available through Public Law 117-32.

Disaster Specific Overview.

The 2023 water year began with continuation of the dry conditions that had characterized the three prior drought years, but a pattern shift occurred in late December with the arrival of an exceptionally strong atmospheric river storm. The remainder of the wet season was characterized by an abundance of atmospheric river storms in stark contrast to their relative paucity in the prior dry years. California received about half of its average annual precipitation between December 26th and January 19th. Multiple state emergency proclamations were issued in March in response to the winter storms, resulting in most of the state's counties being covered by an emergency proclamation by the end of the month. The wet season's storm tracks favored the central and southern Sierra, resulting in 237 percent and 300 percent, respectively, of average snowpacks there. Some of the most significant flood damages also occurred in the middle part of the state.¹

From late December 2022 through early April 2023, California endured at least 12 atmospheric river storms, corridors of air that can carry massive amounts of water over thousands of miles, producing cascading impacts including landslides, sinkholes and downed trees that damaged roads and homes.²

It is estimated that as of early January more than 34 million Californians were under a flood watch - about 90 percent of Californians and about 10 percent of the U.S. population. On January 9th, downtown Los Angeles was under a flash flood watch until midnight, an area of more than 7 million people.³

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Parts of the central California coast got walloped with 1 to 1.25 inches of rainfall per hour, which triggered significant flooding, mudslides, debris flows and closed roadways. And hurricane-force wind gusts hit Oroville, California clocking in at 132-mph, the Weather Prediction Center said. ⁴

For those at higher elevations, intense snow and ferocious winds were listed as being the biggest concerns. Parts of the higher elevations in the Sierra Nevada had gotten more than 100" – or 8.3 feet – of snow in just the previous few weeks, and later in January another 6 feet of snow was expected in some parts of the Sierra.⁵

California had experienced “more deaths in this flood storm since December 31 than we had in the last two fire seasons of the highest fire acreage burned in California.”⁶ At least 22 deaths were confirmed as storm related.⁷

By the end of March 2023, the National Flood Insurance Program (NIFP) has paid out over \$26 million across 489 claims just for the storms and flooding that took place between December 27, 2022, and January 31, 2023.⁸

One of the hardest hit counties was Merced, especially the small town of Planada, in the central valley. The small, mostly Latino town was among the first to be flooded in January.

Researchers at [UC Merced's Community and Labor Center](#) analyzed data from a community survey of 236 households. Researchers estimated more than 700 Planada households – about 83 percent of the town – experienced some type of economic loss from flooding on Jan. 8. Before the flood, census data showed more than 35 percent of families lived below the poverty line, and 97 percent of the nearly 4,000 residents were Hispanic or Latino.

Some key takeaways from the study include:

- Only 17 percent of Planada households emerged unharmed without losing property or missing work.
- 41 percent of households had no property loss but had at least one worker miss work because of flooding. The median number of days of lost work per household was 21 days.
- Among households that lost work, 57 percent had no one eligible for unemployment insurance.
- Half the households are renters and 94 percent of them did not have flood insurance.
- An estimated 211 households lost at least one car, 95 lost a heating system and 108 lost a cooling system.
- About 56 percent of households with property damage said they now have issues with mold.
- More than one-quarter of renters said landlords increased their rent or threatened to evict them.

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- About 43 percent of households that lost work or experienced property damage also reported falling behind on bills, such as rent or mortgage payments, utilities, or both. Unpaid bills averaged \$1,448 per household⁹

December through January Storms (DR-4683)

On January 14, 2023, President Joseph R. Biden, Jr. declared that federal disaster assistance has been made available to the state of California to supplement state, local and tribal recovery efforts in the areas affected by severe winter storms, flooding, landslides, and mudslides beginning on December 27, 2022, and continuing.¹⁰ All told, the declaration covered 14 counties, including Alameda, Amado, Calaveras, Contra Costa, Mendocino, Merced, Monterey, Sacramento, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Cruz, and Ventura.

As of January 25, 2023, Moody's catastrophe risk modeling estimated total U.S. economic losses from the recent California flooding at US \$5-7 billion. This estimate reflects inland flood impacts for the U.S. and includes property damage, contents, and business interruption, across residential, commercial, industrial, automobile and infrastructure assets.¹¹

The insured losses are anticipated to be between US\$0.5-1.5 billion, including losses to the National Flood Insurance Program (NFIP) and the private flood market. However, less than 2 percent of California households have flood insurance.¹²

The storms and damages from subsequent flooding resulted in the disaster becoming one of the first of 2023 to be included in the National Centers for Environmental Information's [list of billion-dollar disasters](#).¹³

Ongoing Threat

In April of 2018, UCLA released a study on California's climate future, which included a prediction of increased "climate whiplash," defined as the non-incremental transition between very dry and very wet weather. California's Fourth Climate Change Assessment projected that climate change will make forests more susceptible to extreme wildfires, especially if greenhouse gas emissions continue to rise and the miles of highways susceptible to coastal flooding in a 100-year storm event will triple from current levels to 370 miles with over 3,750 miles exposed to temporary flooding.¹⁴

The "whiplash" is evident in the 2022-2023 water year, which runs October through September. While a banner year for critically needed water, it also brought devastation throughout the state with floods, mudslides and debris flows. And while the California Department of Forestry and Fire Protection (CAL FIRE), is pleased that as of September 2023 the state has only seen about 276,000 acres burn so far this year, standing in stark contrast to 2020 and 2021 which were [California's worst wildfire seasons on record](#), with 4.3 million and 2.6 million acres burned, respectively, they are

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also very clear that fire season is now year-round and is not over. The state's most devastating fires have occurred in the fall and winter.

The [first winter outlook](#) from the National Oceanic and Atmospheric Administration (NOAA) predicts that a strong El Niño will remain in place through at least the spring, with further strengthening possible over the next couple of months. With a strong El Niño predicted for the coming year, there is above average precipitation forecasted for all of California and higher than average winter temperatures.¹⁵ This means there is likely to be reduced snowpack as a collection and storage mechanism for all that water, leaving the vast majority of the stormwater as surface water in California's rivers, streams, and lakes, with accumulation in any low-lying areas. It also increases the likelihood of burn scars from previous fire sliding, and further saturation and erosion of hillsides and mountain areas inundated in the December 22 and January 23 storms. Obviously, this El Niño cycle has strong potential for adding to the devastation by bringing another year of deluge, which will exacerbate the current impacts on every level.

Summary.

The scope and severity of damage wrought by the 12 atmospheric rivers that inundated California between late December 2022 and the end of January 2023 is difficult to overstate. Those winter storms claimed 22 lives¹⁶, inundated more than 5,102 buildings, dropped more than 27-million-acre feet of precipitation, battered the state with winds gusts up to 132 mph, prompted FEMA IA declarations for 15 counties, and forced the evacuation or displacement of thousands of residents.

1 [California Department of Water Resources. "Water Year 2023: Weather Whiplash, From Drought To Deluge" \(October 2023\). https://water.ca.gov/-/media/DWR%20Website/Web%20Pages/Water%20Basics/Drought/Files/Publications%20And%20Reports/Water%20Year%202023%20wrap%20up%20brochure_01?utm_medium=email&utm](https://water.ca.gov/-/media/DWR%20Website/Web%20Pages/Water%20Basics/Drought/Files/Publications%20And%20Reports/Water%20Year%202023%20wrap%20up%20brochure_01?utm_medium=email&utm)

2 [Center for Disaster Philanthropy. "California Storms", n.d, https://disasterphilanthropy.org/disasters/california-storms/#:~:text=The%20series%20of%20winter%20storms%20in%20late%20December,than%20wildfires%20in%20the%20past%20two%20years%20combined.](https://disasterphilanthropy.org/disasters/california-storms/#:~:text=The%20series%20of%20winter%20storms%20in%20late%20December,than%20wildfires%20in%20the%20past%20two%20years%20combined.)

3 [Nouran Salahieh, Holly Yan and Haley Brink. "90% of Californians are under flood watches as another storm threatens mudslides, power outages and deadly inundation" CNN, January 9, 2023, https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html](https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html)

4 [Nouran Salahieh, Holly Yan and Haley Brink. "90% of Californians are under flood watches as another storm threatens mudslides, power outages and deadly inundation" CNN, January 9, 2023, https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html](https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html)

5 [Nouran Salahieh, Holly Yan and Haley Brink. "90% of Californians are under flood watches as another storm threatens mudslides, power outages and deadly inundation" CNN, January 9, 2023, https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html](https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html)

6 [Nouran Salahieh, Holly Yan and Haley Brink. "90% of Californians are under flood watches as another storm threatens mudslides, power outages and deadly inundation" CNN, January 9, 2023, https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html](https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html)

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7 Center for Disaster Philanthropy. "California Storms", n.d, <https://disasterphilanthropy.org/disasters/california-storms/#:~:text=The%20series%20of%20winter%20storms%20in%20late%20December,than%20wildfires%20in%20the%20past%20two%20years%20combined.>

8 FEMA. "More than \$26 Million Paid in National Flood Insurance Claims", March 27, 2023, <https://www.fema.gov/press-release/20230327/more-26-million-paid-national-flood-insurance-claims>

9 Foy, Nicole. "California flooding harmed 4 out of 5 households in this city. A study tallies the damage" CalMatters, June 15, 2023, <https://calmatters.org/california-divide/2023/06/california-flooding-3/>

10 FEMA. "President Joseph R. Biden, Jr. Approves Major Disaster Declaration for California", January 15, 2023, <https://www.fema.gov/press-release/20230115/president-joseph-r-biden-jr-approves-major-disaster-declaration-california>

11 Moody's. "Moody's RMS Estimates US\$5-7 Billion in Total U.S. Economic Losses from California Flooding", January 25, 2023, <https://www.rms.com/newsroom/press-releases/press-detail/2023-01-25/moodys-rms-estimates-us5-7-billion-in-total-us-economic-losses-from-california-flooding>

12 Moody's. "Moody's RMS Estimates US\$5-7 Billion in Total U.S. Economic Losses from California Flooding", January 25, 2023, <https://www.rms.com/newsroom/press-releases/press-detail/2023-01-25/moodys-rms-estimates-us5-7-billion-in-total-us-economic-losses-from-california-flooding>

13 Center for Disaster Philanthropy. "California Storms", n.d, <https://disasterphilanthropy.org/disasters/california-storms/#:~:text=The%20series%20of%20winter%20storms%20in%20late%20December,than%20wildfires%20in%20the%20past%20two%20years%20combined.>

14 FEMA. "President Joseph R. Biden, Jr. Approves Major Disaster Declaration for California", January 15, 2023, <https://www.fema.gov/press-release/20230115/president-joseph-r-biden-jr-approves-major-disaster-declaration-california>

15 Smith, Hayley. "A warm, wet El Niño winter is in store for California and much of the U.S.", Los Angeles Times, October 19, 2023, <https://www.latimes.com/environment/story/2023-10-19/noaa-predicts-warm-wet-el-nino-winter-for-california-after-summer-of-record-heat>

16 Center for Disaster Philanthropy. "California Storms", n.d, <https://disasterphilanthropy.org/disasters/california-storms/#:~:text=The%20series%20of%20winter%20storms%20in%20late%20December,than%20wildfires%20in%20the%20past%20two%20years%20combined.>

Key facts include ¹⁷:

- The series of winter storms in late December 2022 through mid-January 2023 caused [at least 22 storm-related deaths](#) across California, which is more lives lost than wildfires in the past two years combined.
- The California Geological Survey (CGS) said they had [counted more than 700 landslides](#) across the state between Dec. 30, 2022, and Jan. 23, 2023. [CGS said](#), "Large, deep-seated landslides can happen weeks to months after heavy rains and remain a hazard through the spring and summer."
- The storms through January 2023 helped the Sierra Nevada region to [reach more than 200% of its typical snowpack](#) for that time of year, which eased immediate drought concerns.
- According to the National Weather Service Weather Prediction Center, the statewide [average rainfall for California](#) between Dec. 26 and Jan. 17 was 11.47 inches.

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- Precipitation totals [broke records](#) including in San Francisco, which on Jan. 4 marked the wettest 10-day period since January 1862.
- Data from the California Department of Water Resources indicates that the state's snowpack total for 2022-23 likely [surpassed the record set 40 years ago](#) in 1982-83. While the news was welcome in drought-ridden California, it does come with flooding risk.
- Following weeks of rain and snow, [short-term drought conditions and reservoir levels improved](#), but California is not in the clear when it comes to long-term drought. By early March the amount of water in the snowpack was expected to [continue to alleviate leftover drought conditions](#) but also contribute to ongoing flooding.
- Estimates from Moody's put the [total U.S. economic losses](#) from the California flooding and severe weather in late December 2022 through mid-January 2023 at \$5 billion to \$7 billion. The flood's damage [highlighted the need to address infrastructure](#), which requires significant resources.
 - The storms and damages from subsequent flooding resulted in the disaster becoming one of the first of 2023 to be included in the National Centers for Environmental Information's [list of billion-dollar disasters](#).
- As California prepares for the 2023-2024 storm season, with a strong El Niño predicted for the coming year, there is above average precipitation forecasted for all of California and higher than average winter temperatures.¹⁸ This means there is likely to be reduced snowpack as a collection and storage mechanism for all that water, leaving the vast majority of the stormwater as surface water in California's rivers, streams, and lakes, with accumulation in any low-lying areas. It also increases the likelihood of burn scars from previous fires sliding, and further saturation and erosion of hillsides and mountain areas inundated in the December 22 and January 23 storms.

All these impacts further exacerbated the existing housing crisis in California. Communities impacted by the 2023 winter storms had near zero housing vacancies prior to disasters, limiting options for disaster survivors for either temporary or more long-term housing options. High housing costs resulted in rent-burdened households and many who live precariously close to homelessness.

Given the profound impacts and disruption wrought by the 2023 winter storms on the State of California, unmet needs in the state's Most Impacted and Distressed areas (MID) remain significant. HCD is committed to addressing these needs via pursuing additional resources, including state affordable housing funding, and leveraging other resources to support the statewide recovery effort. In addition, HCD continues to coordinate closely with local, state, and federal partners to collect and analyze data, identify resources, and understand how jurisdictions' unmet needs evolve over time.

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The following figure provides a summary of disaster impacts from “DR-4683” using HUD’s unmet recovery needs methodology as outlined in the November 27, 2023, Federal Register Notice.¹⁹

Unmet Need and Proposed Allocation

Category	Remaining Unmet Need	Percent of Unmet Need	Program Allocation Amount	Percent of Program Allocation
Administration	\$0.00	0.00%	\$5,751,100.00	5.00%
Planning	\$0.00	0.00%	\$0.00	0.00%
Housing	\$1,573,704,423.00	78.86%	\$94,267,900.00	81.96%
Infrastructure	\$241,269,658.95	12.09%	\$0.00	0.00%
Economic Revitalization	\$148,385,252.50	7.44%	\$0.00	0.00%
Public Services	\$0.00	0.00%	\$0.00	0.00%
Mitigation	\$32,200,000.00	1.61%	\$15,003,000.00	13.04%
Total	\$1,995,559,334.45	100.00%	\$115,022,000.00	100.00%

Data Source(s): HCD Regional Housing Need Allocation, HCD Notice of Funding Availability - 2022, 2023, 2024 FEMA and SBA Data Allocation Amount includes project delivery costs and does not include administration and planning costs.

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

2. Unmet Needs Assessment

Overview.

The State of California completed the following needs assessment to identify the effects, long-term needs, and priorities for CDBG-DR funding allocated as a result of the 2023 disasters. The presidentially declared disaster covered by this needs assessment includes the FEMA **declaration DR-4683**.²⁰

¹⁷ Ibid

¹⁸ Smith, Hayley. “A warm, wet El Niño winter is in store for California and much of the U.S.”, Los Angeles Times, October 19, 2023, <https://www.latimes.com/environment/story/2023-10-19/noaa-predicts-warm-wet-el-nino-winter-for-california-after-summer-of-record-heat>

¹⁹ Department of Housing and Urban Development (HUD). “Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements Notice.” Federal Register Vol. 88, No. 226, Part III (Monday November 27, 2023): 82982 Docket Number FR-6428-N-01. Vol. 88, No. 226, Part III (88 FR-82982, November 27, 2023) Docket Number FR-6428-N-01

²⁰ FEMA. “Reports and Notices: Disaster 4683”, n.d, <https://www.fema.gov/disaster/4683/notices>

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The needs assessment includes specific details about unmet needs within the eligible and Most Impacted and Distressed communities. This includes details for housing, infrastructure, and economic revitalization. This assessment discusses additional types of assistance that may be available to affected communities and individuals, such as insurance, other federal assistance or other possible funding sources.

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

The table below lists the counties that FEMA designated for FEMA Individual Assistance (IA) following the disaster of 2023: DR-4683. FEMA IA designation allows the individuals and households in these counties to apply for financial and direct services after a federally declared disaster. These jurisdictions are also referred to as 'disaster-impacted counties.

FEMA IA DECLARED COUNTIES

DR-4683
Alameda, Amador, Calaveras, Contra Costa, Mendocino, Merced, Monterey, Sacramento, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Ventura

Source: FEMA

Within the FEMA IA declared counties, HUD will define the Most Impacted and Distressed (MID) areas. HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HUD determines MID areas using the following factors:²¹

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

21 Cal OES. "2023 Winter Storms Recovery", January 16, 2023, <https://news.caloes.ca.gov/2023-winter-storms-recovery/>

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HUD designated five counties (Merced, Santa Cruz, San Luis Obispo, San Joaquin, and Ventura) as MID areas from the DR-4683 disaster.

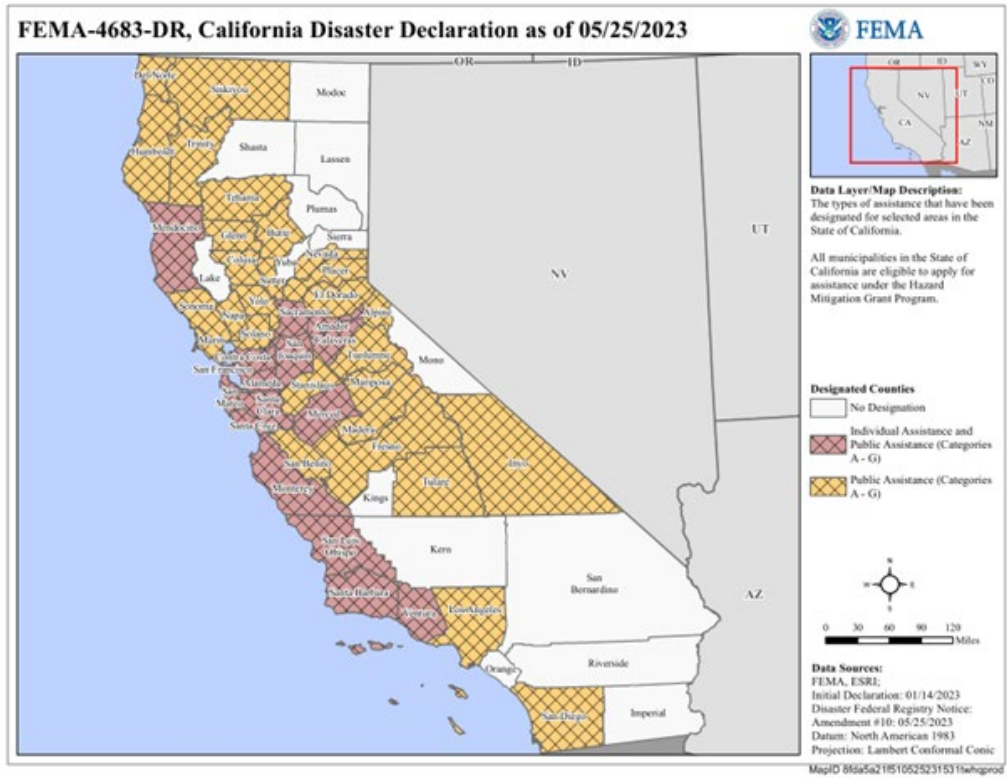
The Federal Register Notice provided clarification that, where HUD has identified an entire zip code as a MID area for the purposes of allocating funds, a grantee may expand program operations to the whole county or counties that overlap with that zip code. HCD proposes to expand eligibility to the county level for both identified zip codes. This expansion will allow housing recovery provided by this grant to help to minimize exposure to future risks for eventual beneficiaries. The zip codes identified in Ventura and Merced include large sections of land in designated floodplains. Our outreach has not identified significant infrastructure or other type of mitigation for these floodplains.

The table below lists the counties that FEMA designated for FEMA IA and the HUD MID counties following the disaster of 2023: DR-4683.

**FEMA IA DECLARED COUNTIES AND HUD
MID**

DR-4683	HUD MID
Alameda	
Amador	
Calaveras	
Contra Costa	
Mendocino	
Merced	X
Monterey	
Sacramento	
San Joaquin	X
San Luis Obispo	X
San Mateo	
Santa Barbara	
Santa Clara	
Santa Cruz	X
Ventura	X

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The following map illustrate the FEMA declared disaster areas and the HUD MID counties for DR-4683.

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Legend

- DR-4683
- MID
- IA/PA
- County Boundary

DR-4683 Most Impacted and Distressed Areas (2023)



Data Source: FEMA

a. Housing Unmet Need

The DR-4683 led to impacts on housing in impacted areas. The geographic spread of the disaster across the State of California presents challenges for identifying consistent data to understand housing unmet needs. This section examines the data available to understand impacts to housing across the disaster area. Data related to housing cost burdens, increased rents, and impacts to MHUs is provided to identify post disaster housing recovery needs for vulnerable populations.

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as “cost burdened.” Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation and childcare, and often lack adequate savings to spend on evacuation, shelter, or recovery from disaster scenarios.²² Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. Every disaster impacted county population is at least 35 percent cost burdened. Amador, San Joaquin, Santa Cruz and Merced County all have populations that are at least 50 percent cost burdened.

Alternate Methodology

The previous section provided a description of housing impacts from DR-4683 using HUD’s approved methodology. However, as noted, the limited number of FEMA IA registrations with verified losses and the emphasis on stick-built homes do not capture the impacts to vulnerable populations. Based on FEMA’s damage assessment those living in manufactured homes and LMI renters are acutely vulnerable population in the impacted areas and not accounted for in FEMA’s datasets. Therefore, an alternative methodology is required for capturing an accurate portrait of unmet post disaster housing recovery needs for these vulnerable populations. Many of the most vulnerable populations faced technology or language barriers accessing FEMA resources. FEMA is attempting to address this issue for future disasters through the Interim Final Rules for IA programs released on January 22, 2024.

Given the data challenges presented in the housing unmet needs section, including the limited FEMA IA and SBA home loan registrations, HCD proposes the following Alternative Methodology for a more holistic portrait of unmet recovery needs. HCD believes this shows a more accurate portrait of total housing impacts from the disasters. This narrative will draw on:

The unmet needs analysis reliance on FEMA and SBA data as required by the FRN creates two significant issues and negatively impacting the most vulnerable community members with the biggest recovery needs. First, the prescribed FRN methodology over

²² California Air Resources Board. “California Housing and Transportation Costs: Impacts and Implications”, n.d, <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/research-solicitations/housing-plus-trans-costs>

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counts homeowners and under counts the impacts to renters. For DR-4683 FEMA IA Housing assistance totaled \$74,443,923 for owners, but only \$8,481,443 for renters. For MID HUD Counties and DR-4683 FEMA IA Housing assistance totaled \$40,701,182 for owners but only \$4,735,584 for renters. Other federal housing recovery programs, such as those provided by USDA also focus more on property owners and not renters. Yet renters, especially LMI renters face the largest obstacles to post disaster housing recovery. When landlords repair and rehab rental units, unless they are regulatory restricted, rents will raise making the disaster impacted rental unit unaffordable and inaccessible for prior LMI renters. Data continues to show increasing rents in DR-4683 MID counties since 2023.

FEMA IA AWARD FOR HOUSING ASSISTANCE BY RENTER AND OWNER

County	Owner	Renter	Total
Alameda	\$ 7,221,999	\$ 1,323,125	\$ 8,545,124
Amador	\$ 994,034	\$ 115,131	\$ 1,109,165
Calaveras	\$ 818,438	\$ 51,263	\$ 869,701
Contra Costa	\$ 5,221,201	\$ 132,148	\$ 5,353,349
Mendocino	\$ 949,731	\$ 6,418	\$ 956,149
Merced	\$ 5,152,946	\$ 1,398,834	\$ 6,551,780
Monterey	\$ 2,676,505	\$ 561,191	\$ 3,237,696
Sacramento	\$ 3,373,220	\$ 420,731	\$ 3,793,951
San Joaquin	\$ 5,210,428	\$ 364,435	\$ 5,574,863
San Luis Obispo	\$ 10,469,024	\$ 593,122	\$ 11,062,146
San Mateo	\$ 6,793,016	\$ 572,766	\$ 7,365,782
Santa Barbara	\$ 4,985,911	\$ 526,192	\$ 5,512,103
Santa Clara	\$ 708,686	\$ 36,894	\$ 745,580
Santa Cruz	\$ 16,636,634	\$ 1,548,622	\$ 18,185,256
Ventura	\$ 3,232,150	\$ 830,571	\$ 4,062,721
Total	\$ 74,443,923	\$ 8,481,443	\$ 82,925,366

Source: FEMA, October 2023

Disaster Case Management

Second, impacted populations with language or technology barriers, as well as those with non-traditional living arrangements were not able to qualify for FEMA aid. The presidential disaster declaration that authorized FEMA IA also served to trigger the Disaster Case Management program, whereby local and state government and private organizations could apply for funding to increase disaster case management services available for impacted individuals. The limitation to FEMA data is seen in the data provided by Disaster Case Manager Providers (DCMPs) deployed for DR-4683. DCMPs deployed for DR-4683 reporting working with the most vulnerable populations including many seniors and renters with significant amount of housing uncertainty. DCMP data as

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of December 2023 identifies 485 renters and 268 owners in the populations, they are serving with unmet housing recovery needs.

Local government and community members provided critical services immediately after both disasters, evacuating neighborhoods, coordinating shelters and supplies, and getting information to displaced residents. Local public service providers in both DR-4683 -affected areas increased their capacity and organized together to serve the needs of the thousands of individuals and families that were impacted by the winter storms. Catholic Charities of California is the lead disaster case management organization for many counties in Northern and Central California recovering from DR-4683. Most households served by Catholic Charities were renters and had no insurance, and had not received FEMA, SBA, or supplemental grant funding. The value of the case management data is highlighted below to demonstrate the vulnerability and ultimate goals of the most impacted populations for DR-4683. The data provided by DCMPs continues to how unmet housing recovery needs for LMI renters in DR-4683 counties. The population served by DCMPs lack private resources or insurance to respond to their post disaster housing needs. This is heavily exacerbated by the housing crisis and lack of affordable rental units in DR-4683 counties.

CASE MANAGEMENT HOUSING GOALS

Ultimate Housing Goals	DR-4683 Number	DR-4683 Percent
Stay in County	697	81%
Stay, Renter	452	53%
Stay, Owner	220	26%
Stay, Undecided	23	3%
Stay, Other	2	0%
Leave County	8	1%
Leave, Renter	7	1%
Leave, Owner	0	0%
Leave, Undecided	1	0%
Leave, Other	0	0%
Unknown	48	6%

Source: DCMP December 2023. Catholic Charities.

DISASTER CASE MANAGEMENT VULNERABILITIES

Vulnerabilities	DR-4683 Number	DR-4683 Percent
Urgent Basic Needs	341	40%
Immediate Medical Needs	27	3%
Safety Risk	93	11%
Housing Insecurity	175	20%
Poverty	171	20%
Unemployment	221	26%
Elderly (65+)	100	12%

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Minor Child (w/o adult)	11	1%
Single Head of Household	54	6%
Disabled	98	11%
Uninsured/Underinsured	126	15%
Isolated	24	3%
Emotional Distress	111	13%
Limited Literacy	74	9%
Limited English	73	9%
Limited Transportation	12	1%
Limited Info. Access	7	1%
Functional Needs (AFN)	24	3%

Source: DCMP December 2023. Catholic Charities

DISASTER CASE MANAGEMENT NEEDS

Metric	DR-4683 Number	DR-4683 Percent
Advocacy	259	30%
Clothing	282	33%
Childrens Services	68	8%
Domestic Animal Services	13	2%
Education/Job Training	34	4%
Employment Assistance	155	18%
Emotional/Spiritual Care	110	13%
Functional Needs (AFN)	83	10%
Funeral Assistance	2	0%
Food/Nutrition	364	43%
Household Needs	351	41%
Legal Assistance	85	10%
Medical Assistance	22	3%
Medical Insurance	13	2%
Missing Person Assistance	0	0%
Removal of Debris	48	6%
Repair/Rebuild	225	26%
Transportation	58	7%
Utilities	182	21%

Source: DCMP December 2023, Catholic Charities

SBA LOANS

The SBA offers Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) to businesses to repair or replace disaster damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment and

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working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations such as charities, churches, and private universities are also eligible. The law limits these business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

The total verified loss for real estate for both federally declared disaster areas was \$124.5 million.

SBA HOME LOAN APPLICATIONS AND VERIFIED LOSS BY COUNTY

County	Total SBA Applications Submitted	Total SBA Loans Approved	SBA Total Verified Loss
Alameda	417	204	\$ 11,100,751.45
Amador	80	28	\$ 1,502,238.71
Calaveras	88	33	\$ 2,673,041.31
Contra Costa	382	225	\$ 12,574,547.74
Mendocino	76	11	\$ 1,254,405.28
Merced	435	95	\$ 9,933,481.67
Monterey	132	50	\$ 3,666,944.08
Sacramento	507	157	\$ 10,403,988.88
San Joaquin	384	113	\$ 7,750,506.67
San Luis Obispo	549	247	\$ 16,365,341.13
San Mateo	268	147	\$ 9,122,677.80
Santa Barbara	329	132	\$ 9,330,161.64
Santa Clara	10	6	\$ 328,172.79
Santa Cruz	778	377	\$ 22,158,774.38
Ventura	314	64	\$ 6,369,942.97
Total	4749	1889	\$ 124,534,976.50

Source: Small Business Administration, Dec 2023

Within the most impacted and distressed areas, SBA has issued 2,460 applications with 896 being approved. The table below details the total approved amount for the MID counties at \$11,896,600.

TOTAL SBA BUSINESS LOANS APPROVED

County	Sum of Total Verified Loss	Sum of Total Amount Disbursed	Unmet Need
Alameda	\$11,446,236.83	\$1,025,700.00	\$10,420,536.83
Amador	\$1,082,181.78	\$56,800.00	\$1,025,381.78
Calaveras	\$967,478.48	\$143,500.00	\$823,978.48
Contra Costa	\$2,152,863.63	\$213,400.00	\$1,939,463.63

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Mendocino	\$551,647.06	\$115,100.00	\$436,547.06
Merced	\$24,527,488.30	\$1,186,000.00	\$23,341,488.30
Monterey	\$1,185,491.10	\$226,100.00	\$959,391.10
Sacramento	\$73,784.31	\$6,547.33	\$67,236.98
San Joaquin	\$8,006,657.86	\$2,528,300.00	\$5,478,357.86
San Luis Obispo	\$12,464,122.57	\$4,030,500.00	\$8,433,622.57
San Mateo	\$5,762,554.44	\$658,500.00	\$5,104,054.44
Santa Barbara	\$26,676,849.34	\$1,464,000.00	\$25,212,849.34
Santa Clara	\$3,736,590.00	\$0.00	\$3,736,590.00
Santa Cruz	\$12,526,465.87	\$2,866,000.00	\$9,660,465.87
Ventura	\$12,484,454.30	\$1,285,800.00	\$11,198,654.30
Total	\$123,644,865.87	\$15,806,247.33	\$107,838,618.54

Source: SBA, December 2023

Additional SBA information for DR-4683 demonstrates landlord verified loss for real properties and the remaining unmet need. Landlords of multifamily buildings who received FEMA and SBA loans are still left with a large gap in unmet need for repair and recovery purposes. This has compounding impacts on the affected LMI and renter populations as these households are faced with increase in rents or the access to repaired housing units. The table below highlights the highest unmet needs are in Merced, Monterey, Sacramento and San Joaquin counties with Merced and San Joaquin being two counties designated as a MID county.

LANDLORD VERIFIED LOSS OF REAL PROPERTY DAMAGE – BUSINESS/EIDL DATA

County	Total Landlord - VL	Total Disbursed	Unmet Need	Percent of Unmet Need
Alameda	\$687,550	\$534,600	\$152,950	22.25%
Amador	\$59,873	\$50,000	\$9,873	16.49%
Calaveras	\$42,660	\$12,900	\$29,760	69.76%
Contra Costa	\$141,880	\$65,500	\$76,380	53.83%
Mendocino	\$110,793	\$115,100	-\$4,307	-3.89%
Merced	\$5,105,878	\$635,200	\$4,470,678	87.56%
Monterey	\$356,484	\$79,800	\$276,684	77.61%
Sacramento	\$1,723,718	\$469,100	\$1,254,618	72.79%
San Joaquin	\$427,912	\$98,500	\$329,412	76.98%
San Luis Obispo	\$1,829,067	\$1,217,900	\$611,167	33.41%
San Mateo	\$787,923	\$610,800	\$177,123	22.48%
Santa Barbara	\$721,917	\$640,200	\$81,717	11.32%
Santa Clara	\$0	\$0	\$0	0.00%
Santa Cruz	\$3,409,361	\$1,489,300	\$1,920,061	56.32%

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Ventura	\$513,977	\$479,900	\$34,077	6.63%
Total	\$15,918,993	\$6,498,800	\$9,420,191	59.18%

Source: SBA Business/EIDL Data, according to NAICS Code – 2023

Manufactured Home Damage and Unmet Need

MANUFACTURED HOUSING UNITS IMPACTED IN MID COUNTIES DR-4683

2023 MID Counties	Number of damaged MHU units	Total Need Impact	HCD MORE Program Available Funds	Total Unmet Need	Percent of Unmet Need
Santa Cruz	71	\$24,850,000	\$10,900,000	\$13,950,000	8%
Merced	176	\$61,600,000	\$27,250,000	\$34,350,000	19%
San Joaquin	236	\$82,600,000	\$36,787,500	\$45,812,500	25%
Ventura	94	\$32,900,000	\$14,987,500	\$17,912,500	10%
San Luis Obispo	328	\$114,800,000	\$46,325,000	\$68,475,000	38%
Totals	905	\$316,750,000	\$136,250,000	\$180,500,000	100%

Note: \$323,000 per unit cost plus \$27,000 per unit to elevate unit above flood plain level.

Source(s): Local Jurisdiction; HCD OOR Program DR Grant Implementation 2017-2018 and HCD NOFA for Manufactured Housing Opportunity & Revitalization Program (MORE).

LMI Households

The information provided from DCMP data and outreach to local governments and stakeholders impacted by DR-4683 show how California’s ongoing affordable housing crisis was exasperated by this disaster. The housing crisis demonstrated the low vacancy rates and a mismatch between housing costs and income, making communities more vulnerable to recovering from disasters. In DR-4683 MID counties faced significant amounts of rent burden and overcrowding.

Overpayment (Housing Cost Burden)

The table below illustrates the housing cost burden for both owner and renter households in the five MID counties of DR-4683. Current standards measure housing cost in relation to gross household income: households spending more than 30 percent of their income, including utilities, are generally considered to be overpaying or “cost burdened.” Severe overpaying occurs when households pay 50 percent or more of their gross income for housing. The impact of cost burden is exacerbated by disaster and disproportionately affects the low-income households, especially renters. This cost-burden is brought on by the historic lack of affordable housing in the impacted areas of DR-4683. These renter low-income households that are cost-burdened are not resilient to withstanding disaster recovery as they have insufficient resources to seek new housing and are at high risk for displacement.

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HOUSING COST BURDEN IN MID COUNTIES - DR-4683

	California	Merced County	San Joaquin County	San Luis Obispo County	Santa Cruz County	Ventura County
Total:	13,550,586	87,830	241,903	111,713	96,015	278,631
Owner-occupied housing units:	7,565,502	51,369	153,146	68,511	57,911	182,466
Less than \$20,000:	419,236	3,831	8,335	4,707	3,360	8,403
30 percent or more	379,461	3,348	7,449	4,491	2,760	7,987
\$20,000 to \$34,999:	454,678	3,981	10,239	5,095	3,857	8,921
30 percent or more	320,761	2,761	7,430	3,306	2,306	7,049
\$35,000 to \$49,999:	490,930	4,783	11,484	5,108	2,693	11,171
30 percent or more	285,548	2,908	6,508	2,874	1,223	7,324
\$50,000 to \$74,999:	879,331	9,277	20,257	7,109	5,405	19,303
30 percent or more	436,256	3,737	9,162	2,184	2,790	9,578
\$75,000 or more:	5,248,939	28,513	101,881	46,492	42,008	132,190
30 percent or more	911,560	4,020	14,534	7,434	7,646	25,943
Zero or negative income	72,388	984	950	0	588	2,478
Renter-occupied housing units:	5,985,084	36,461	88,757	43,202	38,104	96,165
Less than \$20,000:	787,034	6,102	12,490	6,472	5,685	10,258
30 percent or more	727,180	5,846	11,397	6,033	5,237	9,327
\$20,000 to \$34,999:	707,031	5,750	9,508	3,907	5,038	10,146
30 percent or more	653,544	5,068	9,120	3,610	4,494	9,016
\$35,000 to \$49,999:	640,021	3,637	12,359	4,985	3,534	11,446
30 percent or more	549,908	2,271	10,337	3,699	2,670	9,771

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\$50,000 to \$74,999:	958,848	7,936	15,147	7,066	5,164	15,146
30 percent or more	667,392	3,022	8,554	5,561	3,553	12,716
\$75,000 or more:	2,583,155	9,659	33,336	18,433	16,773	44,698
30 percent or more	582,627	113	4,220	3,089	4,400	13,247
Zero or negative income	106,562	1,403	1,468	505	596	1,318
No cash rent	202,433	1,974	4,449	1,834	1,314	3,153

Source: U.S. Census Bureau. "Tenure by Housing Costs as a Percentage of Household Income in the Past 12 Months." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25106, 2022

Flood Insurance and Tenure

FEMA and SBA housing assistance appears to have met the needs of single-family stick-built owners. HCD recognizes that there are some very limited numbers of homeowners who continue to face challenges in post disaster housing recovery. Limited information provided by local organizations does appear to indicate eligibility for CDBG-DR funds. Some homeowners are limited in their ability to rebuild due to ongoing flood plain management and levee repair discussions that have not been finalized at time of this Action Plan. The rental housing stock impacted by DR-4683 was comprised of small landlords, who operated one or two single family rentals. No multifamily housing with 5 or greater housing units was impacted by DR-4683. These small landlords are not eligible for FEMA assistance for their rental units. With virtually no National Flood Insurance Program insurance coverage, small landlords will have to rely on capital markets to cover repair and rehabilitation of damaged units. With continued reports of rents increasing in MID counties, unless a unit is deed restricted it will not be affordable to prior tenants. Therefore, construction of new rental units is a key part of post disaster housing recovery from LMI renters impacted by DR-4683.

FLOOD INSURANCE AND TENURE – DR-4683

DR-4683	Total	With Flood Insurance	% of total	Without Flood Insurance	% of Total
Owners	16,097	1,290	8.0	14,807	92.0
Renters	8,255	166	1.4	8,139	98.6
No Tenure	221	13	5.9	208	94.1
Totals	24,573	1,419		23,154	

Source: FEMA FIDA Report 21196, April 2023

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Overcrowding

Overcrowding is defined as a unit occupied by 1.01 persons or more per room (excluding bathrooms and kitchens) and units with severely overcrowded units are occupied by more than 1.5 persons per room. Overcrowding is directly related to the lack of availability of affordable housing stock in disaster impacted areas of DR-4683. As previously demonstrated, the direct relation of housing income and cost burden are tied to overcrowded households whereby low-income households struggle with cost burden are households that tend to be overcrowded, in particular, renter households impacted by disaster. Households overcrowded before the disaster were most prominent in Merced, San Joaquin and Ventura counties.

OVERCROWDED HOUSEHOLDS IN MID COUNTIES - DR-4683

	California	Merced County	San Joaquin County	San Luis Obispo County	Santa Cruz County	Ventura County
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Total:	13,550,586	87,830	241,903	111,713	96,015	278,631
Owner occupied:	7,565,502	51,369	153,146	68,511	57,911	182,466
0.50 or less occupants per room	5,047,547	30,918	94,380	50,763	38,866	129,404
0.51 to 1.00 occupants per room	2,175,576	17,343	48,768	15,826	16,925	44,935
1.01 to 1.50 occupants per room	245,855	2,176	7,572	1,635	1,595	6,299
1.51 to 2.00 occupants per room	69,554	652	1,861	239	352	1,187
2.01 or more occupants per room	26,970	280	565	48	173	641
Renter occupied:	5,985,084	36,461	88,757	43,202	38,104	96,165
0.50 or less occupants per room	2,804,056	16,742	40,786	24,177	17,179	43,837
0.51 to 1.00 occupants per room	2,405,487	14,279	37,329	15,754	16,155	40,811

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1.01 to 1.50 occupants per room	434,042	3,400	7,593	2,007	2,721	6,588
1.51 to 2.00 occupants per room	243,934	828	2,347	1,038	1,104	3,269
2.01 or more occupants per room	97,565	1,212	702	226	945	1,660

Source: U.S. Census Bureau. "Tenure by Occupants per Room." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25014, 2022

OVERCROWDED BY PERCENT FOR MID COUNTIES - DR-4683

County	Overcrowding -Total	Overcrowding -Owner	Overcrowding -Renter	Severe Overcrowding - Total	Severe Overcrowding - Owner	Severe Overcrowding - Renter
Ventura	7.05%	4.45%	11.98%	2.43%	1.00%	5.13%
San Joaquin	8.53%	6.53%	11.99%	2.26%	1.58%	3.44%
San Luis Obispo	4.65%	2.81%	7.57%	1.39%	0.42%	2.93%
Merced	9.73%	6.05%	14.92%	3.38%	1.81%	5.60%
Santa Cruz	7.18%	3.66%	12.52%	2.68%	0.91%	5.38%

Source: U.S. Census Bureau. "Tenure by Occupants per Room." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25014, 2022,

These impacts were evident during the immediate aftermath of DR-4683. The lack of available vacancies and large numbers of overcrowded. Seniors living in Arbor Mobile Home Park are reporting continued occupancy of damaged MHUs, because there are not options for alternative housing with FEMA assistance provided. As highlighted by DR-4683 Housing Impact Assessment and Recovery Needs Analysis produced with the inter-agency recovery directorate which included emergency management agencies, as well as HUD staff deployed for DR-4683, the flood risk is most prominent in areas that are primarily rural and relies heavily on agriculture. Manufactured home units represent a significant portion of the non-deed restricted affordable housing stock in DR-4683 MID counties.

MANUFACTURED HOUSING UNITS IMPACTED IN MID COUNTIES DR-4683

2023 MID Counties	Number of damaged MHU units	Total Need Impact	HCD MORE Program Available Funds	Total Unmet Need	Percent of Unmet Need
Santa Cruz	71	\$24,850,000	\$10,900,000	\$13,950,000	8%
Merced	176	\$61,600,000	\$27,250,000	\$34,350,000	19%
San Joaquin	236	\$82,600,000	\$36,787,500	\$45,812,500	25%

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Ventura	94	\$32,900,000	\$14,987,500	\$17,912,500	10%
San Luis Obispo	328	\$114,800,000	\$46,325,000	\$68,475,000	38%
Totals	905	\$316,750,000	\$136,250,000	\$180,500,000	100%

Source(s): Local Jurisdiction; HCD OOR Program DR Grant Implementation 2017-2018 and HCD NOFA for Manufactured Housing Opportunity & Revitalization Program (MORE).

Pre-Disaster Housing Needs

The flooding caused adverse impacts on lower-income communities particularly in Merced and Santa Cruz counties and compounded the state’s historic lack of affordable housing stock for low- and moderate-income residents. The makeup of these residents includes vulnerable populations such as migrant seasonal workers and homeless populations that are acutely challenged to recover quickly from the loss of jobs and housing. Moreover this impacted pre-disaster housing stock and the geographic distribution of housing stock for farmworkers in rural agricultural as compared to more metropolitan areas where more housing choice and access are available is unique to the impacted areas of DR-4683.

The need for additional housing, in particular affordable housing with access and functional needs, is highlighted by the pre-disaster housing stock. In these areas, flooding intensified the lack of infrastructure and shortages of quality affordable housing. Farmworkers have significant and compounded impacts to the state’s robust agriculture industry, which has cross-cutting and cascading impacts on housing. Reports from USDA on available vacancies in rental projects average 4 percent vacancy rate in Merced, San Joaquin, San Luis Obispo and Ventura counties as of January 2024. Santa Cruz county is not eligible for USDA funding.

USDA VACANCY RATE IN MID COUNTIES - DR-4683

MID County	Total USDA Rental Units	Available Vacancies (Jan 2024)	
Merced	568	27	4.8%
Santa Cruz	N/A	N/A	
San Joaquin	31	3	9.7%
San Luis Obispo	352	12	3.4%
Ventura	160	4	2.5%
Total	1111	46	4.1%

Source: USDA Rural Development

Living within the MID areas of DR-4683 are the most vulnerable populations which include high percentage of renter households that cover the following household characteristics²³:

²³ Cal OES. “2023 Winter Storms Recovery”, January 16, 2023, <https://news.caloes.ca.gov/2023-winter-storms-recovery/>

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- Survivors who live in manufactured housing/Mobile home housing
- Elderly Survivors
- Survivors with access and functional needs
- Migrant and year-round farm workers who utilize
- Homeless population
- Undocumented population

Overall, pre-disaster housing stock data availability and existing lack of affordable housing units were identified by all stakeholders as the key to equitable recovery from DR-4683.

Rent Increases

The table below demonstrates the percent increase of rents in the five MID counties for DR-4683. Post-disaster increases in rents are often caused by the limited supply of units prior to a disaster. Tenants, especially renters, are most at risk of facing increasing housing cost due to the availability of units post-disaster. This scenario of having a limited supply of units and a rising housing cost more often lead to overcrowding of units in the disaster impacted areas.

OBSERVED RENT INCREASE FOR MID COUNTIES

DR-4683 MID Counties	Zillow Observed Rent Index 12/31/2021	Zillow Observed Rent Index 12/31/2022	Since 12/31/21	Since 12/31/22	Percent Change Since 12/31/21	Percent Change Since 12/31/22
Ventura County	\$2,680.97	\$2,796.41	\$217.27	\$101.83	8.10%	3.64%
San Joaquin County	\$2,140.77	\$2,223.94	\$157.93	\$74.77	7.38%	3.36%
San Luis Obispo County	\$2,406.64	\$2,582.30	\$359.98	\$184.32	14.96%	7.14%
Merced County	\$1,783.38	\$1,838.96	\$125.28	\$69.70	7.02%	3.79%
Santa Cruz County	\$3,198.07	\$3,481.92	\$286.40	\$2.55	8.96%	0.07%

Source: Zillow

Multifamily Housing Units - Regional Housing Need Allocation (RHNA)

The State of California has made significant investment of state funds and enhanced planning and regulatory requirements to address the housing crisis. However, the scale of the housing crisis is much larger and need greater than currently allocated for. This is especially important for LMI housing development. The table summarized the continued gap of LMI housing units as conducted by HCD’s Housing Policy Division and

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implementation of state Housing Element law. The table below clearly indicates the continued housing gaps and that CDBG-DR resources allocated for this purpose will not be supplanting any other resources. Even with the state of California’s investment of \$1.2 billion in LMI rental housing new construction, HCD is estimating a \$1.5 billion gap in funding

MULTIFAMILY HOUSING RHNA FOR MID COUNTIES - DR-4683

MID Counties	Total Units RHNA VLI and LI	Total Fundings needed for VLI and LI	Resources Available per NOFAs	Unmet Need (Totals RHNA less Resources)	% of Unmet Need
Merced	1756	\$ 522,603,828	\$ 225,815,000	\$296,788,828	19%
San Joaquin	2969	\$ 851,270,439	\$ 356,550,000	\$494,720,439	31%
San Luis Obispo	1306	\$ 401,729,119	\$178,275,000	\$223,454,119	14%
Santa Cruz	2468	\$816,229,744	\$356,550,000	\$459,679,744	29%
Ventura	544	\$ 170,371,293	\$ 71,310,000	\$ 99,061,293.	6%
Total	9043	\$2,762,204,423	\$1,188,500,000	\$1,573,704,423.	100%

Source: HCD RHNA, HCD NOFAs 2022, 2023, 2024

Housing Recovery Programs

The alternative methodology proposed clearly demonstrate the need for post disaster housing recovery programs for addressing the needs of MHU owners as well as LMI renters. To allocate funds between housing programs for these two populations, HCD relied on data from DCMPs.

HCD proposes the two housing programs: Disaster Recovery MHP accelerator and MHU replacement and elevation is not apportioned as follows.

HOUSING RECOVERY PROGRAMS - DR-4683

DCMP Data				Proposed Housing Recovery Programs	
268	Owners	36%	37%	\$35,250,000	MHU Replacement-OOR
485	Renters	64%	63%	\$59,017,900	MHP Accelerator
753	Total	100%	100%	\$94,267,900	

Source: DCMP December 2023, Catholic Charities, Local Jurisdiction.

Disaster Damage and Impacts.

The DR-4683 led to significant impacts on housing in impacted areas. The geographic spread of the disasters across the State of California also presents challenges for

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identifying consistent data to understand housing unmet needs. This section examines the data available to understand impacts to housing across the disaster area.

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

The scope of the 2023 storm damage is unprecedented in California's recent history. 5,102 residences reported some level of flooding, 3,225 (63.2%) had a recorded high-water mark at the time of the FEMA inspection on the first floor of the residence. Sixteen residences experience water levels above the first floor of the residence. Of those with high water location on the first floor, 2,431 (75.4%) experienced 6 inches of water or less. An additional 1,450 (28.4%) residences had high water locations recorded as being outside of the residence, suggesting that flood waters did not enter those residences but inundated their properties.

The 2023 storms claimed 22 lives, prompted FEMA IA declarations for 13 counties, and forced the evacuation or displacement of tens of thousands of residents.

California's financial resources and recovery infrastructure, which were already beleaguered by the slew of fire and fire-related environmental disasters and drought disasters in past years, and the global COVID-19 pandemic, are stretched thin. While the storms brought much needed water to the state, the historic drought and heavy drafting of ground water in the central valley over the years have caused severe subsidence issues. According to the US Geological Survey, subsidence has been recorded at over a foot per year²⁴ in some locations, the effects of subsidence include damage to buildings and infrastructure, increased flood risk in low-lying areas, and lasting damage to groundwater aquifers and aquatic ecosystems²⁵

As California endures for the 2023-24 winter storm season, the effects of climate change show no signs of slowing, and areas already damaged by earlier fires, flooding/mudslides, and those vulnerable to future disasters are bracing for continued challenges. The storms that comprised DR-4683 only further highlight the need for both disaster recovery and mitigation funding, planning, and program implementation in California's impacted and vulnerable areas.

All these impacts further exacerbated the existing housing crisis in California. Communities impacted by pre-existing impacts of disasters over the last 5 years, and the 2023 storms had near zero housing vacancies prior to disasters, limiting options for

²⁴ USGS. "Areas of Land Subsidence in California", n.d, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html

²⁵ USGS. "Measuring Land Subsidence in California", n.d, <https://www.usgs.gov/centers/land-subsidence-in-california#:~:text=The%20effects%20of%20subsidence%20include,groundwater%20aquifers%20and%20aquatic%20ecosystems.>

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disaster survivors for either temporary or more long-term housing options. High housing costs and record inflation have resulted in rent-burdened households and many who live precariously close to homelessness.

Limitation of Data

This section presents an analysis of FEMA IA, SBA, and CDI data to reflect damage caused by DR-4683 and to demonstrate the ongoing unmet recovery needs of residents impacted by the disasters. Ultimately, no one data source accurately captures the population impacted by DR-4683. This Action Plan and unmet needs analysis captures a point in time and reflects the best available data at the time of its publication.

- **FEMA Individual Assistance (IA)** – The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. Residents register voluntarily for FEMA IA, and eligible applicants include both renters and owners. FEMA Verified Loss awards only provide assistance for repair and replacement to make the home habitable. As the data limitations above note, residents must register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. While the FEMA-IA dataset alone does not represent the full scale of the disaster impacts, data available at the household level, including income and damage, allows for an analysis that follows the unmet needs calculation outlined in the Federal Register Notice.
- **Small Business Administration** – Similar to FEMA IA, the SBA disaster loan program is a voluntary program available to impacted households. As a loan program, SBA residential loan registrations skew towards homeowners. However, compared to FVL inspections, which only cover the cost for repair and replacement, SBA loan amounts are based on an inspection that covers the full cost to restore a home.
- **California Department of Insurance Claims (CDI)** – While floods and hurricanes can rely on National Flood Insurance Program data, fire damage must be collected from individual insurance companies. HCD requested address level insurance claim information for disaster impacted households through the CDI, but household level information on claims was not available. However, the CA Department of Insurance collected information from individual insurance companies on claims by zip code. As better data becomes available, HCD will provide an updated estimate of claims by household. This data covers a large period of time and does not guarantee that claims are disaster related.
- **American Community Survey 2022 (ACS-5 Year) and Decennial Census (DEC 2020)** – The American Community Survey (ACS) is ongoing and updated annually and is based on a sample of United States residents (3.5 million) in the 50 states. The ACS asks more comprehensive questions than the ten-year census with the goal of “providing current information to communities every year... for programs, economic development, emergency management, and understanding local issues and conditions”. The decennial census, on the other

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hand, is conducted every ten years and counts every person living in the United States. The census asks a shorter set of questions concerning age, sex, race, Hispanic origin, and owner/renter status. The goal of the census is to “provide an official count of the population... (and) provide critical data that lawmakers and many others use to provide daily services, products, and support for communities”²⁶. Both the ACS and DEC data are displayed at a county level in this report and therefore, may aggregate the data in a way that obscures important details. For example, poverty rate may be low at a County-level but concentrated in just a few zip codes which may be more vulnerable.

- **Center for Disease Control/ Agency for Toxic Substances and Disease Registry Social Vulnerability Data** – The CDC/ATSDR Social Vulnerability Index was created as a geographic database to help emergency response planners and public health officials identify and map communities to prepare and respond to disaster events. The index ranks each census tract in the United States (and aggregates into the county level) on 15 social factors, including socioeconomic status – below poverty, unemployment rate, income, no high school diploma, household composition and disability – age 65 or older, age 17 or younger, civilian with a disability, single parent households, minority status and language – minority and speaks English “less than well”, and housing type and transportation – multi-unit structures, mobile homes, crowding, no vehicle, group quarters²⁷. The benefit of this data is that it provides an aggregate score to better understand holistic vulnerabilities compared to similar geographies around the United States. The limitation of this data is that it was last updated in 2020 and therefore, may be outdated.
- **Homeless Point-In-Time Count** – The Point-In-Time (PIT) Count is an annual count conducted by every Continuum of Care (CoC) in the country over the course of a single night in January. It counts the number of people housed in emergency shelter, transitional housing, Safe Havens, and the number of people who are unsheltered. Because the count only takes place on one day, it is a static count and may not reflect annual numbers. Because point-in-time counts include the number of people sleeping outside and in shelters, they often undercount the “hidden homeless” - people experiencing homelessness who are sleeping in motels, on friends’ couches, in cars, etc. This count often underestimates children and families experiencing homelessness.²⁸
- **Low- and Moderate- Income Data** – This data is available on HUD Exchange at the block group, census tract, and county level. The limitation of this data is that the LMI calculations come from the 2011-2015 ACS data and may be outdated. Percent LMI is used to determine if programs meet national objectives for Community Development Block Grant funding. According to the description of the

²⁶ U.S Census Bureau. “Understanding and Using the American Community Survey Public Use Microdata Sample Files”, February 2021,

https://www.census.gov/content/dam/Census/library/publications/2021/acs/acs_pums_handbook_2021.pdf.

²⁷ Centers for Disease Control and Prevention. “CDC SVI Documentation 2018.”, January 31, 2020,

https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2018.html

²⁸ Agans, Robert P. et al. “Enumerating the Hidden Homeless: Strategies to Estimate the Homeless Gone Missing From a Point-in-Time Count” *Journal of Official Statistics*, vol.30, no.2, 2014, pp.215-229,

<https://sciendo.com/article/10.2478/jos-2014-0014>

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LMI data provided, the statistical information used in the calculation of estimates identified in the data sets comes from two sources: 1) the 2011-2015 American Community Survey (ACS), and 2) the Income Limits for Metropolitan Areas and for Non-Metropolitan Counties. The data necessary to determine an LMI percentage for an area is not published in the publicly available ACS data tables. Therefore, the Bureau of Census matches family size, income, and the income limits in a special tabulation to produce the estimates.²⁹

Housing and Urban Development (HUD) Income Limit Data - This data is available on HUD Exchange at the block group, census tract, and county level. The HUD limits calculate the very low (50 percent) income limit, extremely low-income limits, and low (80 percent) income limits for 1 person to 8 person families for every county and state in the United States. The limits are recalculated annually to determine eligibility for public housing, section 8 vouchers, and disabilities and elderly programs.³⁰

(1) Single Family v. Multi-Family Needs; Owner Occupied v. Tenant.

HCD will implement a suite of housing recovery programs to address the unmet recovery need in the HUD MID areas: an Owner-Occupied Housing Replacement and Elevation Program focused on MHUs only (MHU), and a Multifamily Housing Program (DR-ACCEL). Further details are provided in this Action Plan in the Housing Recovery Programs section.

For the 2023 disaster year, housing programs will receive \$94,267,900, while mitigation programs will receive \$15,003,000.

Affordable Rents

Eligibility of multifamily project proposals to be funded by CDBG-DR will be assessed by HCD. Specific eligibility criteria will identify projects that have received funding commitments but continue to have a financial gap in reaching construction and occupancy. HCD is proposing to establish an accelerator program based on affordable rents at the annual high HOME rents for each applicable area. For those units that are planned for extremely low-income maximum households, HCD is proposing to establish program affordable rents at the CTCAC rents for 30 percent area median income (AMI) for each applicable area.

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

²⁹ HUD. "FY 2023 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data", n.d., <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

³⁰ HUD. "Income Limits", May 15, 2023, https://www.huduser.gov/portal/datasets/il.html#2021_query

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

FEMA Individual Assistance

The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. However, as the data limitations above note, residents must voluntarily register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. Despite these limitations, the following section provides an overview of the housing impacts for FEMA Disaster 4683. Across the disaster areas, a total 25,067 households registered for FEMA IA assistance, including 16459 owner-occupied households and 8380 renter households. The 2023 FRN outlines the following the damage categories by owner-occupied and rental units:

FEMA Inspected Owner Units

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

FEMA Inspected Owner Units - Personal Property

- Minor-Low: Less than \$2,500 of FEMA inspected personal property damage.
- Minor-High: \$2,500 to \$3,499 of FEMA inspected personal property damage.
- Major-Low: \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- Major-High: \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Rental Units

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.

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

TOTAL FEMA IA REGISTRATIONS DR-4683

Disaster	Owner	Renter	Unknown	Grand Total
DR-4683	16459	8380	228	25067

Source: FEMA, Oct 2023

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

FEMA INDIVIDUAL ASSISTANCE BY RENTER AND OWNER - DR-4683

Disaster Declaration	Owner	Renter	Unknown	Total
DR-4683	16,459.00	8,380.00	228	25,067.00
Alameda	1559	626	33	2218
Amador	227	94	1	322
Calaveras	345	93	6	444
Contra Costa	1369	243	17	1629
Mendocino	258	53	3	314
Merced	1204	1969	38	3211
Monterey	568	503	0	1071
Sacramento	2433	1142	17	3592
San Joaquin	1482	731	6	2219
San Luis Obispo	1834	650	25	2509
San Mateo	1086	273	16	1375
Santa Barbara	1104	500	22	1626
Santa Clara	245	81	3	329
Santa Cruz	2057	868	28	2953
Ventura	688	554	13	1255

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Source: FEMA, Oct 2023

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

AVERAGE FEMA IA VERIFIED LOSS - OVER \$0 DR-4683

Disaster Declaration	Owner	Renter	Total
DR-4683	\$36,070,010.67	\$3,458,797.44	\$39,528,808.11

Source: FEMA, Oct 2023

Impact on Renters

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

FEMA IA RENTERS - LOSS OVER \$0 WITH PERSONAL PROPERTY DAMAGE - HUD DAMAGE CATEGORY - DR-4683

Disaster Declaration	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Grand Total
DR-4683	7370	513	304	99	36	8322
Alameda	585	23	10	6	3	627
Amador	77	3	3	10	1	94
Calaveras	86	5	2	0	0	93
Contra Costa	232	4	2	3	2	243
Mendocino	52	1	0	0	0	53
Merced	1706	102	101			1909
Monterey	429	48	21	3	2	503
Sacramento	1071	50	15	4	2	1142
San Joaquin	661	35	18	13	4	731
San Luis Obispo	559	44	29	10	8	650
San Mateo	217	23	19	12	2	273
Santa Barbara	432	39	16	7	6	500
Santa Clara	76	2	1	1	1	81
Santa Cruz	746	48	43	27	5	869

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Ventura	441	86	24	3	0	554
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Source: FEMA, Oct 2023

FEMA IA Owner, LOSS OVER \$0 WITH PERSONAL PROPERTY DAMAGE, BY HUD DAMAGE CATEGORY

Disaster Declaration	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Grand Total
DR-4683	15805	356	182	79	34	16456
Alameda	1526	23	8	2	0	1559
Amador	223	3	0	1	0	227
Calaveras	331	8	5	1	0	345
Contra Costa	1353	12	1	1	1	1368
Mendocino	255	1	1	0	0	257
Merced	1063	55	43	31	12	1204
Monterey	544	15	6	1	1	567
Sacramento	2406	19	7	1	0	2433
San Joaquin	1423	28	21	7	3	1482
San Luis Obispo	1736	55	28	9	6	1834
San Mateo	1005	38	29	11	3	1086
Santa Barbara	1081	14	4	1	4	1104
Santa Clara	243	2	0	0	0	245
Santa Cruz	1952	69	25	9	2	2057
Ventura	664	14	4	4	2	688

Source: FEMA, Oct 2023

FEMA IA Owner, LOSS OVER \$0 WITH REAL PROPERTY DAMAGE, BY HUD DAMAGE CATEGORY

Disaster Declaration	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Grand Total
DR-4683	13,700	1,367	1,057	288	47	16,459
Alameda	1327	110	104	14	4	1559
Amador	179	25	18	5	0	227
Calaveras	292	39	9	4	1	345
Contra Costa	1218	64	66	20	1	1369
Mendocino	220	24	11	3	0	258
Merced	883	145	151	22	3	1204
Monterey	428	71	54	13	2	568
Sacramento	2216	159	45	13	0	2433
San Joaquin	1231	163	73	12	3	1482
San Luis Obispo	1399	204	179	46	6	1834
San Mateo	880	91	88	24	3	1086
Santa Barbara	986	64	40	12	2	1104

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Santa Clara	216	12	14	3	0	245
Santa Cruz	1633	151	167	88	18	2057
Ventura	592	45	38	9	4	688

Source: FEMA, Oct 2023

Average FEMA IA Verified Loss for Personal Property by Renter and Owner

County	Owner	Renter	Total
Alameda	\$143,833.80	\$158,838.62	\$302,672.42
Amador	\$24,776.82	\$101,824.22	\$126,601.04
Calaveras	\$47,135.01	\$21,888.48	\$69,023.49
Contra Costa	\$96,457.97	\$61,098.96	\$157,556.93
Mendocino	\$18,110.11	\$5,675.45	\$23,785.56
Merced	\$542,717.32	\$938,275.89	\$1,480,993.21
Monterey	\$75,610.26	\$201,102.55	\$276,712.81
Sacramento	\$133,399.15	\$209,503.39	\$342,902.54
San Joaquin	\$218,814.99	\$261,670.23	\$480,485.22
San Luis Obispo	\$314,208.37	\$306,481.51	\$620,689.88
San Mateo	\$266,219.96	\$186,247.98	\$452,467.94
Santa Barbara	\$119,759.31	\$231,698.31	\$351,457.62
Santa Clara	\$15,679.55	\$23,168.45	\$38,848.00
Santa Cruz	\$289,254.72	\$415,207.33	\$704,462.05
Ventura	\$106,056.04	\$336,116.07	\$442,172.11
Total	\$2,412,033.38	\$3,458,797.44	\$5,870,830.82

Source: FEMA, Oct 2023

Average FEMA IA Verified Loss for Real Property by Renter and Owner

County	Owner	Renter	Total
Alameda	\$2,873,106.20	\$0.00	\$2,873,106.20
Amador	\$535,091.92	\$0.00	\$535,091.92
Calaveras	\$573,407.91	\$0.00	\$573,407.91
Contra Costa	\$2,256,655.16	\$0.00	\$2,256,655.16
Mendocino	\$443,786.39	\$0.00	\$443,786.39
Merced	\$3,460,943.88	\$0.00	\$3,460,943.88
Monterey	\$1,670,092.38	\$0.00	\$1,670,092.38
Sacramento	\$2,193,294.96	\$0.00	\$2,193,294.96
San Joaquin	\$2,549,261.65	\$0.00	\$2,549,261.65
San Luis Obispo	\$4,969,742.29	\$0.00	\$4,969,742.29
San Mateo	\$2,617,108.47	\$0.00	\$2,617,108.47
Santa Barbara	\$1,615,789.44	\$0.00	\$1,615,789.44
Santa Clara	\$310,649.04	\$0.00	\$310,649.04
Santa Cruz	\$6,393,372.63	\$0.00	\$6,393,372.63

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Ventura	\$1,195,674.97	\$0.00	\$1,195,674.97
Total	\$33,657,977.29	\$0.00	\$33,657,977.29

Source: FEMA, Oct 2023

FEMA IA Award for Personal Property by Renter and Owner

County	Owner	Renter	Total
Alameda	\$25,788.66	\$53,752.77	\$79,541.43
Amador	\$8,276.31	\$93,107.86	\$101,384.17
Calaveras	\$21,271.45	\$5,470.42	\$26,741.87
Contra Costa	\$3,686.45	\$20,167.77	\$23,854.22
Mendocino	\$3,725.45	\$2,680.45	\$6,405.90
Merced	\$235,734.09	\$676,810.64	\$912,544.73
Monterey	\$24,483.44	\$115,244.31	\$139,727.75
Sacramento	\$38,553.78	\$91,201.45	\$129,755.23
San Joaquin	\$87,691.08	\$120,493.93	\$208,185.01
San Luis Obispo	\$83,845.12	\$106,357.79	\$190,202.91
San Mateo	\$74,543.13	\$87,694.77	\$162,237.90
Santa Barbara	\$27,767.05	\$122,961.53	\$150,728.58
Santa Clara	\$1,891.95	\$2,117.59	\$4,009.54
Santa Cruz	\$80,050.14	\$257,516.92	\$337,567.06
Ventura	\$44,468.72	\$124,776.26	\$169,244.98
Total	\$761,776.82	\$1,880,354.46	\$2,642,131.28

Source: FEMA, Oct 2023

FEMA IA Award for Repair by Renter and Owner

County	Owner	Renter	Total
Alameda	\$3,550,261.22	\$0.00	\$3,550,261.22
Amador	\$609,254.80	\$0.00	\$609,254.80
Calaveras	\$582,731.26	\$0.00	\$582,731.26
Contra Costa	\$2,587,325.65	\$0.00	\$2,587,325.65
Mendocino	\$617,004.24	\$0.00	\$617,004.24
Merced	\$2,524,244.07	\$0.00	\$2,524,244.07
Monterey	\$1,200,668.71	\$0.00	\$1,200,668.71
Sacramento	\$1,550,561.62	\$0.00	\$1,550,561.62
San Joaquin	\$2,578,191.63	\$0.00	\$2,580,820.38
San Luis Obispo	\$6,005,586.64	\$0.00	\$6,008,178.19
San Mateo	\$3,036,768.53	\$0.00	\$3,036,768.53
Santa Barbara	\$2,449,839.60	\$0.00	\$2,449,839.60
Santa Clara	\$194,689.02	\$0.00	\$194,689.02
Santa Cruz	\$8,566,626.18	\$0.00	\$8,566,626.18
Ventura	\$1,481,880.11	\$0.00	\$1,481,880.11

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Total	\$37,535,633.28	\$0.00	\$37,540,853.58
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Source: FEMA, Oct 2023

FEMA IA Award for Housing Assistance by Renter and Owner

County	Owner	Renter	Total
Alameda	\$ 7,221,999	\$ 1,323,125	\$ 8,545,124
Amador	\$ 994,034	\$ 115,131	\$ 1,109,165
Calaveras	\$ 818,438	\$ 51,263	\$ 869,701
Contra Costa	\$ 5,221,201	\$ 132,148	\$ 5,353,349
Mendocino	\$ 949,731	\$ 6,418	\$ 956,149
Merced	\$ 5,152,946	\$ 1,398,834	\$ 6,551,780
Monterey	\$ 2,676,505	\$ 561,191	\$ 3,237,696
Sacramento	\$ 3,373,220	\$ 420,731	\$ 3,793,951
San Joaquin	\$ 5,210,428	\$ 364,435	\$ 5,574,863
San Luis Obispo	\$ 10,469,024	\$ 593,122	\$ 11,062,146
San Mateo	\$ 6,793,016	\$ 572,766	\$ 7,365,782
Santa Barbara	\$ 4,985,911	\$ 526,192	\$ 5,512,103
Santa Clara	\$ 708,686	\$ 36,894	\$ 745,580
Santa Cruz	\$ 16,636,634	\$ 1,548,622	\$ 18,185,256
Ventura	\$ 3,232,150	\$ 830,571	\$ 4,062,721
Total	\$ 74,443,923	\$ 8,481,443	\$ 82,925,366

Source: FEMA, Oct 2023

FEMA IA Award for Replace by Renter and Owner

County	Owner	Renter	Total
Alameda	\$0.00	\$0.00	\$0.00
Amador	\$0.00	\$0.00	\$0.00
Calaveras	\$0.00	\$0.00	\$0.00
Contra Costa	\$0.00	\$0.00	\$0.00
Mendocino	\$0.00	\$0.00	\$0.00
Merced	\$0.00	\$0.00	\$0.00
Monterey	\$0.00	\$0.00	\$0.00
Sacramento	\$0.00	\$0.00	\$0.00
San Joaquin	\$0.00	\$0.00	\$0.00
San Luis Obispo	\$0.00	\$0.00	\$0.00
San Mateo	\$0.00	\$0.00	\$0.00
Santa Barbara	\$0.00	\$0.00	\$0.00
Santa Clara	\$0.00	\$0.00	\$0.00
Santa Cruz	\$0.00	\$0.00	\$0.00
Ventura	\$0.00	\$0.00	\$0.00
Total	\$0.00	\$0.00	\$0.00

Source: FEMA, Oct 2023

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Small Business Administration Loans

Small Business Administration Housing (SBA) loans are the basic form of federal disaster assistance for homeowners with good credit history and income, and whose private property sustained damage that is not fully covered by insurance. Homeowners and renters whose property was damaged by a presidentially declared disaster are eligible to apply for an SBA low-interest loan. Interest rates on these loans are determined by law and are assigned on a case-by-case basis. Households in DR-4683 impacted counties submitted a total of xx applications, but to date only xx have been approved. The figures below give an overview of total applications, approvals, and total SBA Verified Losses by county.

SBA HOME LOAN APPLICATIONS AND VERIFIED LOSS BY COUNTY (DR-4683)

County	Total SBA Applications Submitted	Total SBA Loans Approved	SBA Total Verified Loss
Alameda	417	204	\$ 11,100,751.45
Amador	80	28	\$ 1,502,238.71
Calaveras	88	33	\$ 2,673,041.31
Contra Costa	382	225	\$ 12,574,547.74
Mendocino	76	11	\$ 1,254,405.28
Merced	435	95	\$ 9,933,481.67
Monterey	132	50	\$ 3,666,944.08
Sacramento	507	157	\$ 10,403,988.88
San Joaquin	384	113	\$ 7,750,506.67
San Luis Obispo	549	247	\$ 16,365,341.13
San Mateo	268	147	\$ 9,122,677.80
Santa Barbara	329	132	\$ 9,330,161.64
Santa Clara	10	6	\$ 328,172.79
Santa Cruz	778	377	\$ 22,158,774.38
Ventura	314	64	\$ 6,369,942.97
Total	4749	1889	\$ 124,534,976.50

Source: Small Business Administration, Dec 2023

Summary of Housing Impacts

Using the methodology provided by HUD in the 2023 FRN, the following figure provides the baseline calculation for housing unmet needs in counties impacted by the 2023 disasters in California.

HOUSING UNMET NEED - HUD METHODOLOGY

Damage Category	Owner	Owner	Renter	Renter	Total	Total
	Count	Total Damage	Count	Total Damage	Count	Total Damage
Major-Low	1239	\$12,991,494.89	304	\$849,952.72	1,543	\$13,841,447.61
Major-High	367	\$5,953,734.42	99	\$769,242.23	466	\$6,722,976.65
Severe	81	\$270,387.30	36	\$490,148.61	117	\$760,535.91
Total	1687	\$19,215,616.61	439	\$2,109,343.56	2,126	\$21,324,960.17

Housing Tenure

A Harvard University study entitled “America’s Rental Housing 2022” posited that renters are uniquely vulnerable to climate change and related disasters because renters receive less assistance after disasters than homeowners. The study cited a 2019 HUD analysis of CDBG-DR-funded recovery examples, which showed that only an eighth of housing activities funding went to affordable rental construction or rental assistance. They also found that renter households often lack the “financial resources to evacuate, information about disaster risks, and adequate insurance cover.”³¹ A 2017 survey showed that nearly 40 percent of renters did not have the funds necessary to evacuate in a disaster - more than three times the percent of homeowners.³²

Every county impacted by the 2023 disasters is an owner-occupied majority county. At the same time, renters make up a significant portion of every county’s population, with the most renter-occupied housing units in Alameda, Merced, Monterey, Sacramento, San Mateo, Santa Barbara, Santa Clara, San Joaquin, and Santa Cruz which all have 40 percent or more renter-occupied housing units.

HOUSING TENURE BY COUNTY

County	Owner-Occupied Housing Units	Owner-Occupied Housing Units	Renter-Occupied Housing Units	Renter-Occupied Housing Units
DR-4683	2,121,552		1,498,261	
Alameda	317,451	54.2%	268,367	45.8%
Amador	12,440	79.0%	3,305	21.0%
Calaveras	14,114	82.1%	3,084	17.9%
Contra Costa	274,388	67.2%	134,149	32.8%
Mendocino	21,044	60.9%	13,513	39.1%
Merced	44,156	53.4%	38,604	46.6%

³¹ Joint Center for Housing Studies of Harvard University. “America’s Rental Housing”, 2024, https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Americas_Rental_Housing_2024.pdf

³² Joint Center for Housing Studies of Harvard University. “America’s Rental Housing”, 2017, https://www.jchs.harvard.edu/sites/default/files/harvard_jchs_americas_rental_housing_2017_0.pdf

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Monterey	68,359	52.2%	62,614	47.8%
Sacramento	328,664	58.3%	235,192	41.7%
San Joaquin	142,391	60.0%	95,032	40.0%
San Luis Obispo	67,031	62.0%	41,068	38.0%
San Mateo	157,368	59.5%	106,955	40.5%
Santa Barbara	78,168	52.8%	69,864	47.2%
Santa Clara	361,551	55.6%	288,801	44.4%
Santa Cruz	57,852	60.0%	38,635	40.0%
Ventura	176,575	64.1%	99,078	35.9%

Source: U.S. Census Bureau 2018-2022 American Community Survey, 5 Year Estimates

Median House Value

After disasters, areas that were affected by or adjacent to disaster incidents often experience a statistically significant decline in housing value.³³ The table below established the median housing values in impacted counties before the floods of 2023. The pre-2023 median house values for disaster-impacted counties range from around \$400,000 (Amador, Calaveras, Mendocino, Sacramento, San Joaquin) to a high range of \$999,000 for Alameda and \$1,400,000 for San Mateo County.

MEDIAN HOUSE VALUE - OWNER OCCUPIED HOUSING

DR-4683 County	Median Value
Alameda	\$999,200
Amador	\$409,600
Calaveras	\$404,200
Contra Costa	\$787,300
Mendocino	\$463,700
Merced	\$342,300
Monterey	\$683,700
Sacramento	\$465,900
San Joaquin	\$462,000
San Luis Obispo	\$726,700
San Mateo	\$1,441,300
Santa Barbara	\$714,800
Santa Clara	\$1,316,800
Santa Cruz	\$951,300
Ventura	\$719,100

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

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Source: U.S. Census Bureau 2018-2022 American Community Survey, 5 Year Estimates

MEDIAN GROSS RENT – DR-4683

DR-4683 County	Median Gross Rent
Alameda	\$2,229
Amador	\$1,257
Calaveras	\$1,621
Contra Costa	\$2,234
Mendocino	\$1,240
Merced	\$1,200
Monterey	\$1,873
Sacramento	\$1,599
San Joaquin	\$1,542
San Luis Obispo	\$1,800
San Mateo	\$2,805
Santa Barbara	\$1,964
Santa Clara	\$2,719
Santa Cruz	\$2,094
Ventura	\$2,140

Source: U.S. Census Bureau 2018-2022 American Community Survey, 5 Year Estimates

(2) Public Housing and Affordable Housing.

MULTIFAMILY ASSISTED HOUSING - 2023

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

Source(s): <https://hudgis-hud.opendata.arcgis.com/datasets/multifamily-properties-assisted/explore>, Accessed 2023

PUBLIC HOUSING AUTHORITIES DAMAGED - 2023

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Alameda	0.00	0.00	0.00	\$0.00

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Amador	0.00	0.00	0.00	\$0.00
Calaveras	0.00	0.00	0.00	\$0.00
Contra Costa	0.00	0.00	0.00	\$0.00
Mendocino	0.00	0.00	0.00	\$0.00
Merced	421	0.00	0.00	\$0.00
Monterey	0.00	0.00	0.00	\$0.00
Sacramento	0.00	0.00	0.00	\$0.00
San Joaquin	992	0.00	0.00	\$0.00
San Luis Obispo	0.00	0.00	0.00	\$0.00
San Mateo	0.00	0.00	0.00	\$0.00
Santa Barbara	0.00	0.00	0.00	\$0.00
Santa Clara	0.00	0.00	0.00	\$0.00
Santa Cruz	0.00	0.00	0.00	\$0.00
Ventura	1,176	0.00	0.00	\$0.00
Total	0.00	0.00	0.00	\$0.00

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

Multifamily Assisted Housing

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	0.00	0.00	0.00	0.00	\$0.00
Minor-High	0.00	0.00	0.00	0.00	\$0.00
Major-Low	0.00	0.00	0.00	0.00	\$0.00
Major-High	0.00	0.00	0.00	0.00	\$0.00
Severe	0.00	0.00	0.00	0.00	\$0.00
Total	0.	0.	0.	0.	\$0.00

Source(s): No Damage Data Reported
FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.

Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Merced	421	0	0	\$0.00
San Joaquin	992	0	0	\$0.00
San Luis Obispo	0	0	0	\$0.00
Santa Cruz	0	0	0	\$0.00
Ventura	1,176	0	0	\$0.00

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County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Total	2,589	0	0	\$0.00

Source(s): No Damage Data Reported. No Unit number data were reported from San Luis Obispo and Santa Cruz Counties.

Fair Housing, Civil Rights Data and Advancing Equity.

The Governor’s Office of Planning and Research (OPR) leads long range planning and recovery project implementation for climate resilience and sets equitable recovery goals for state agencies. HCD’s proposed 2023 Action Plan and proposed programs align with these goals outlined by OPR and presents programs that allow disaster impacted communities with different capacity levels to have access to disaster recovery and mitigation programs.

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

“Climate vulnerability describes the degree to which natural, built, and human systems are at risk of exposure to climate change impacts. Vulnerable communities experience heightened risk and increased sensitivity to climate change and have less capacity and fewer resources to cope with, adapt to, or recover from climate impacts. These disproportionate effects are caused by physical (built and environmental), social, political, and/ or economic factor(s), which are exacerbated by climate impacts. These factors include, but are not limited to, race, class, sexual orientation and identification, national origin, and income inequality.³⁴

To further state identified goals and address climate vulnerability, HCD’s proposed 2023 CDBG-DR and Mitigation program endeavor to align planning efforts at the state and local level, promote housing and infrastructure to reduce climate risk and reduce climate risk, and develop planning documents that are used throughout government decision-making processes. For the proposed disaster recovery and mitigation programs, HCD will work to align program design to fit the following activities:

³⁴ State of California. “Strengthen Protections for Climate Vulnerable Communities”, n.d, <https://climateresilience.ca.gov/priorities/strengthen-protections/>

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

Affirmatively Further Fair Housing

HCD affirms its commitment to affirmatively furthering fair housing through its CDBG-DR programs. At the point of the Action Plan development, FEMA Individual Assistance does not provide racial and demographic information on applicants, but other analysis of available data on protected classes is contained in the Action Plan document. All program guidelines include details on collecting demographic information of applicants (OOR), and LMI and any other specific vulnerable populations served by applicants (MHP).

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

Disasters exacerbate existing problems in a community, particularly as protected classes have fewer resources to rebound from them. With high housing costs across the state and limited options available, disasters further tighten already stressed housing markets, including many areas impacted by the 2023 disasters. Due to lack of available housing, many disaster survivors, if financially able, move out of the area or

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state, while others are forced to live in temporary housing or lose their home.³⁵ HCD is committed to Affirmatively Furthering Fair Housing and all disaster recovery and mitigation programs will adhere to its approved Analysis of Impediments to Fair Housing.³⁶ HCD goes beyond the federal requirements for furthering fair housing including implementation of AB 686, and the ongoing work of the Fair Housing and Accountability and Enforcement teams within the department.³⁷ The following provides an analysis of federal protected classes within the areas impacted by the 2023 disasters, including Most Impacted and Distressed Areas. The Fair Housing Act defines federal protected classes as race, color, national origin, religion, sex, familial status, and disability. HCD is committed to fulfilling its fair housing and civil rights duties for all CDBG-DR and Mitigation activities. Furthermore, fair housing and civil rights obligations, including potential impacts to protected classes, will be taken into consideration in the event that CDBG-DR and Mitigation funds are re-programmed in the future.

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

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

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

³⁵ SAMHSA. "Disaster Technical Assistance Center Supplemental Research Bulletin Greater Impact: How Disasters Affect People of Low Socioeconomic Status", July 2017, https://www.samhsa.gov/sites/default/files/dtac/srb-low-ses_2.pdf

³⁶ HCD. "Final 2020 Analysis of Impediments to Fair Housing Choice", June 2020, <https://www.hcd.ca.gov/policy-research/plans-reports/docs/executivesummary.pdf> HCD. "Final 2020 Analysis of Impediments to Fair Housing Choice", June 2020, <https://www.hcd.ca.gov/policy-research/plans-reports/docs/executivesummary.pdf>

³⁷ HCD. "AB 686 Summary of Requirements in Housing Element Law Government Code Section 8899.50, 65583(c)(5), 65583(c)(10), 65583.2(a)", April 23, 2020, https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab686_summaryhousingelementfinal_04222020.pdf

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- Historically distressed and underserved communities.

This section examines data showing protected classes, vulnerable populations, and historically underserved groups in the areas impacted by the 2023 disasters, including maps showing LMI and RECAP areas. The Outreach and Engagement section provides further details on HCD's approach to engage with and communicate opportunities for how protected classes can participate in the planning process, which protected classes may be recipients or beneficiaries of CDBG-DR or Mitigation funding, and HCD's approach to ensuring both outreach and program activities follow both federal and state requirements in terms of accessibility and reasonable accommodation.

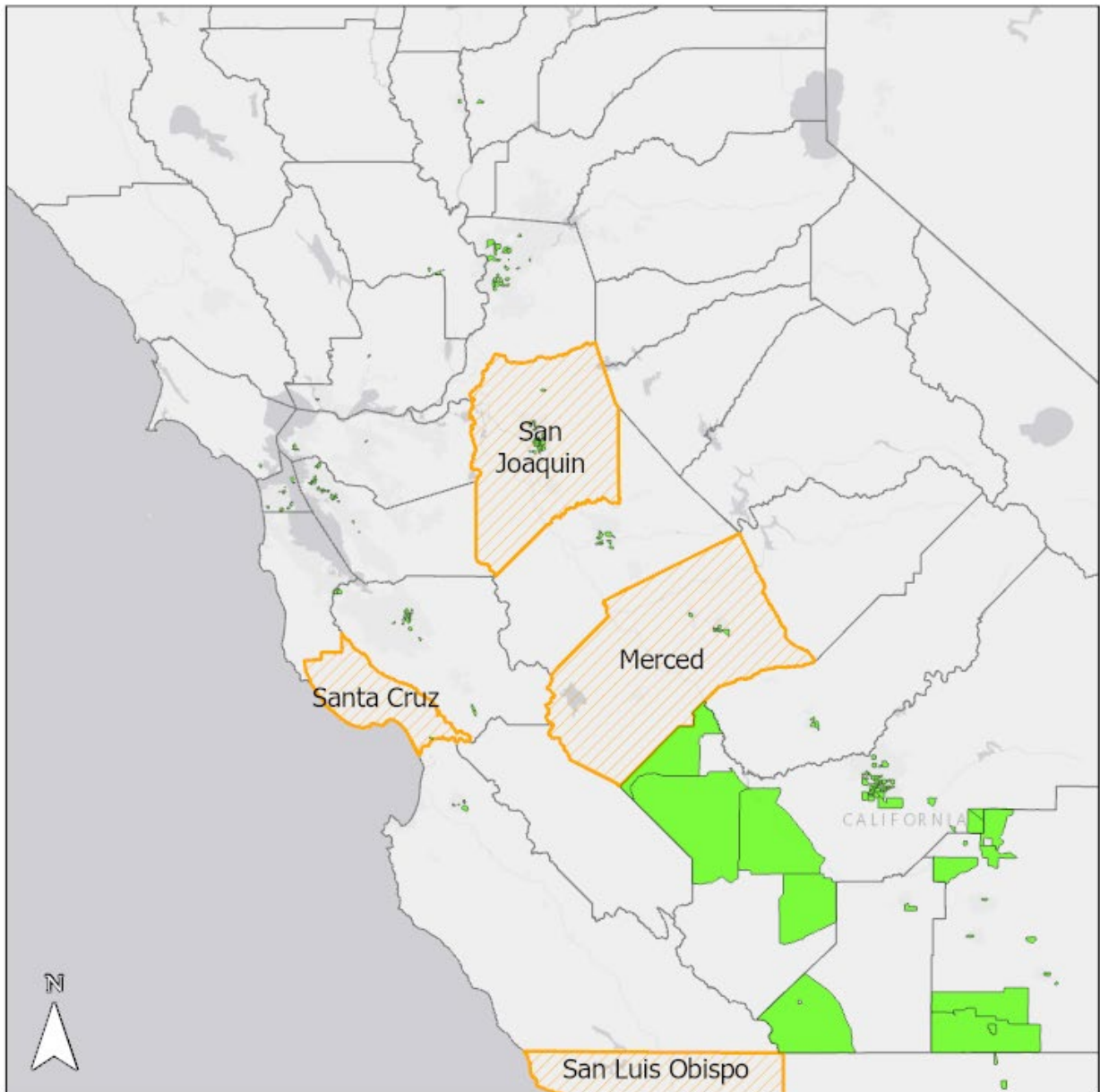
The Proposed Use of Funds section outlines HCD's approach to ensure that the all proposed programs addressing barriers that individuals may face when enrolling in and accessing CDBG-DR assistance.

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

Racially and Ethnically Concentrated Areas of Poverty




HUD defines Racially and Ethnically Concentrated Areas of Poverty (RECAP) as areas that have a non-White population of 50 percent or more with 40 percent or more of the population in in poverty, or a poverty rate that is greater than three times the average poverty rate in the area. The following maps show the RECAP areas within the counties impacted by DR-4683.

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0 15 30 60
Miles

Legend

-  R/ECAP
-  2023 DR-4683 MID Counties
-  County Boundary

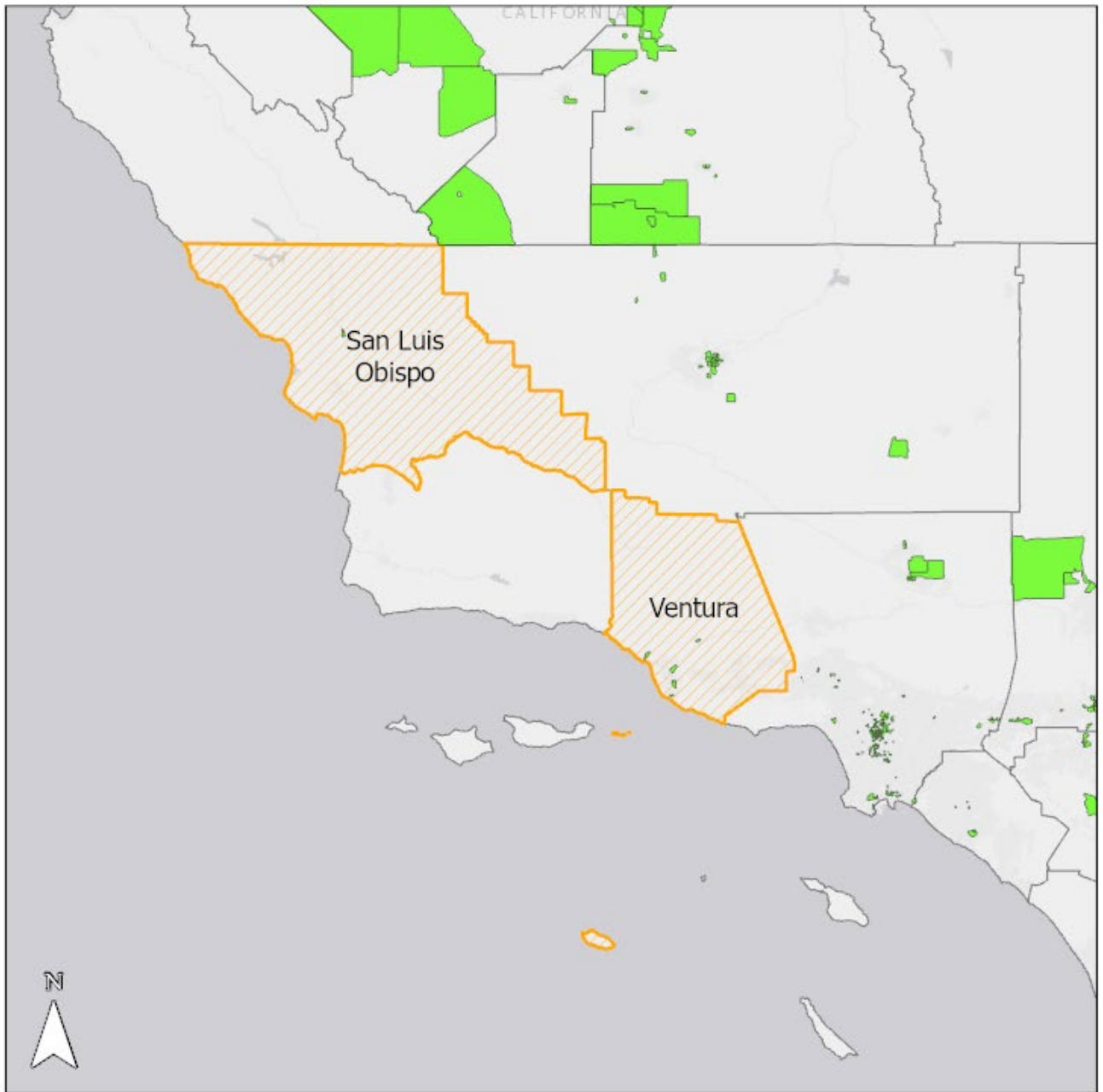
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) - 2023



Data Source: HUD (2023)




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0 15 30 60
Miles

Legend

-  R/ECAP
-  2023 DR-4683 MID Counties
-  County Boundary

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) - 2023



Data Source: HUD (2023)

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Poverty Rate

People living in poverty are disproportionately affected by disasters. People in poverty are more likely to be exposed to disasters due to a higher likelihood to live in riskier areas – disaster risk and a history of redlining nonwhite, lower income populations to high-risk areas makes homes in riskier areas more accessible and less expensive for people in poverty.

Of the counties impacted by DR-4683, Merced, Mendocino and Calaveras counties have the highest poverty rates, with more than 10 percent of the population living in poverty. San Mateo, Santa Clara, and Amador have the lowest poverty rates, with less than 8 percent of the population living in poverty. In total, the disaster impacted over 3,000,000 people living in poverty across all impacted counties.

DR-4683 POVERTY RATE BY COUNTY

County	Total Household	Below poverty level	Percent below poverty level
Alameda	32,220	585,818	5.5%
Amador	677	15,745	4.3%
Calaveras	1,410	17,198	8.2%
Contra Costa	23,287	408,537	5.7%
Mendocino	3,974	34,557	11.5%
Merced	12,828	82,760	15.5%
Monterey	11,788	130,973	9.0%
Sacramento	52,439	563,856	9.3%
San Joaquin	23,980	237,423	10.1%
San Luis Obispo	6,594	108,099	6.1%
San Mateo	10,309	264,323	3.9%
Santa Barbara	10,806	148,032	7.3%
Santa Clara	26,664	650,352	4.1%
Santa Cruz	5,982	96,487	6.2%
Ventura	16,539	275,653	6.0%

Source: U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates

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0 25 50 100
 Miles

Poverty rate by percentage

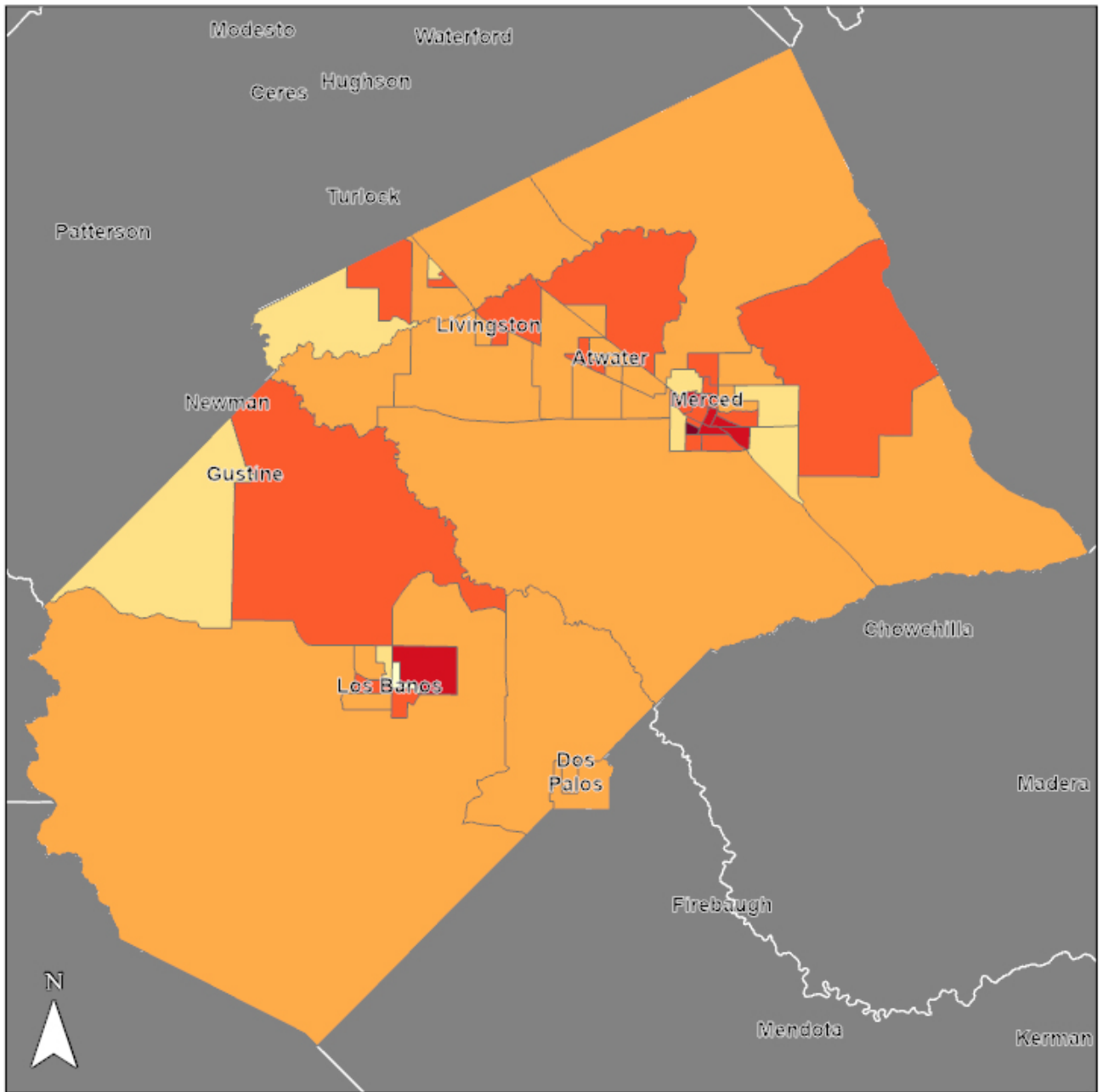
0.0 - 5.0	20.0 - 30.0
5.0 - 10.0	30.0 - 40.0
10.0 - 20.0	40.0 - 100

Percentage of persons by poverty estimate (2022)
 DR-4683 counties by census tract



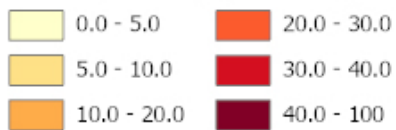
Data Source: 2018-2022 ACS 5-Year Estimates

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0 5 10 20 Miles

Poverty rate by percentage

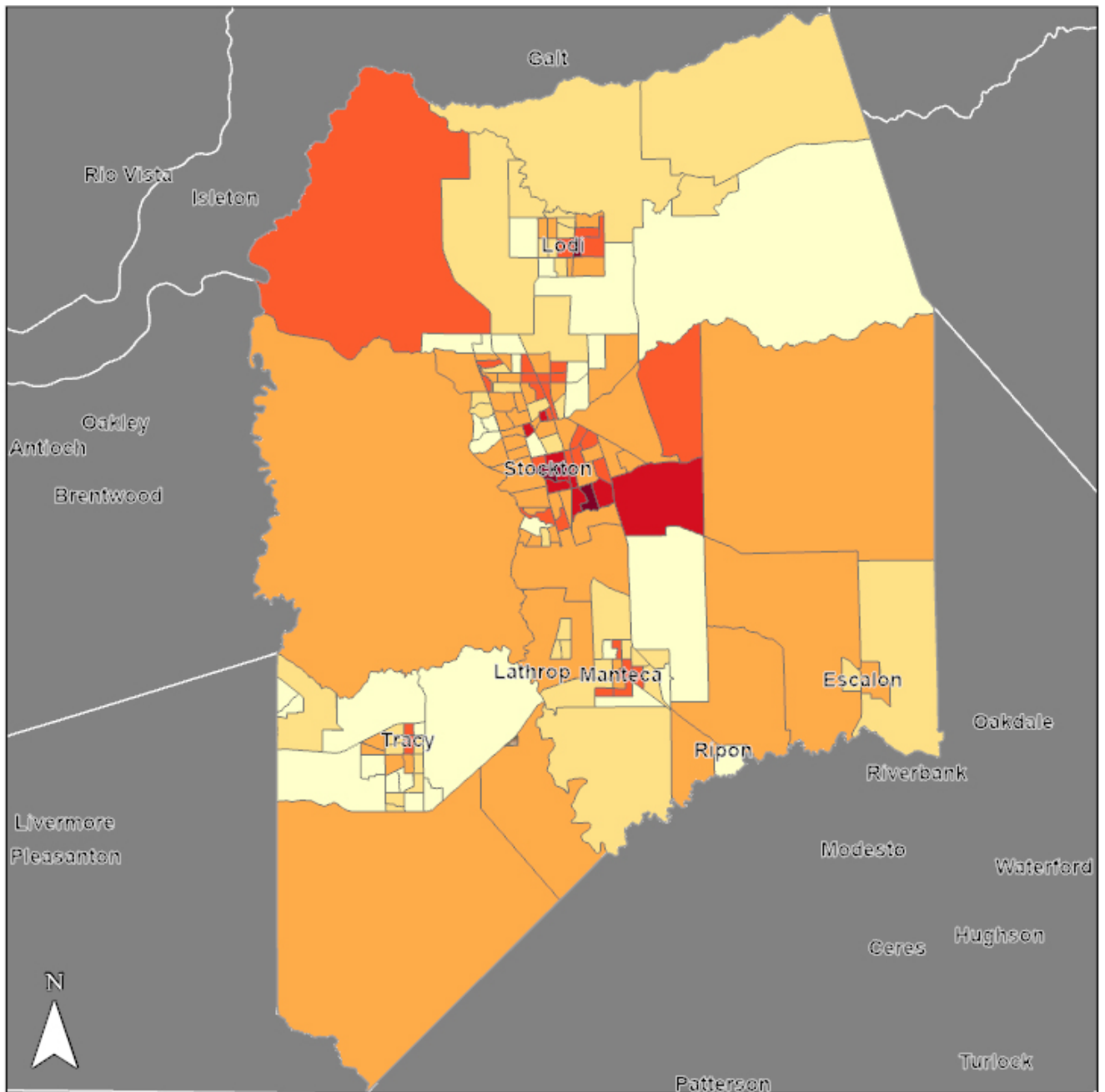


Percentage of persons below by poverty estimate (2022)
 Merced County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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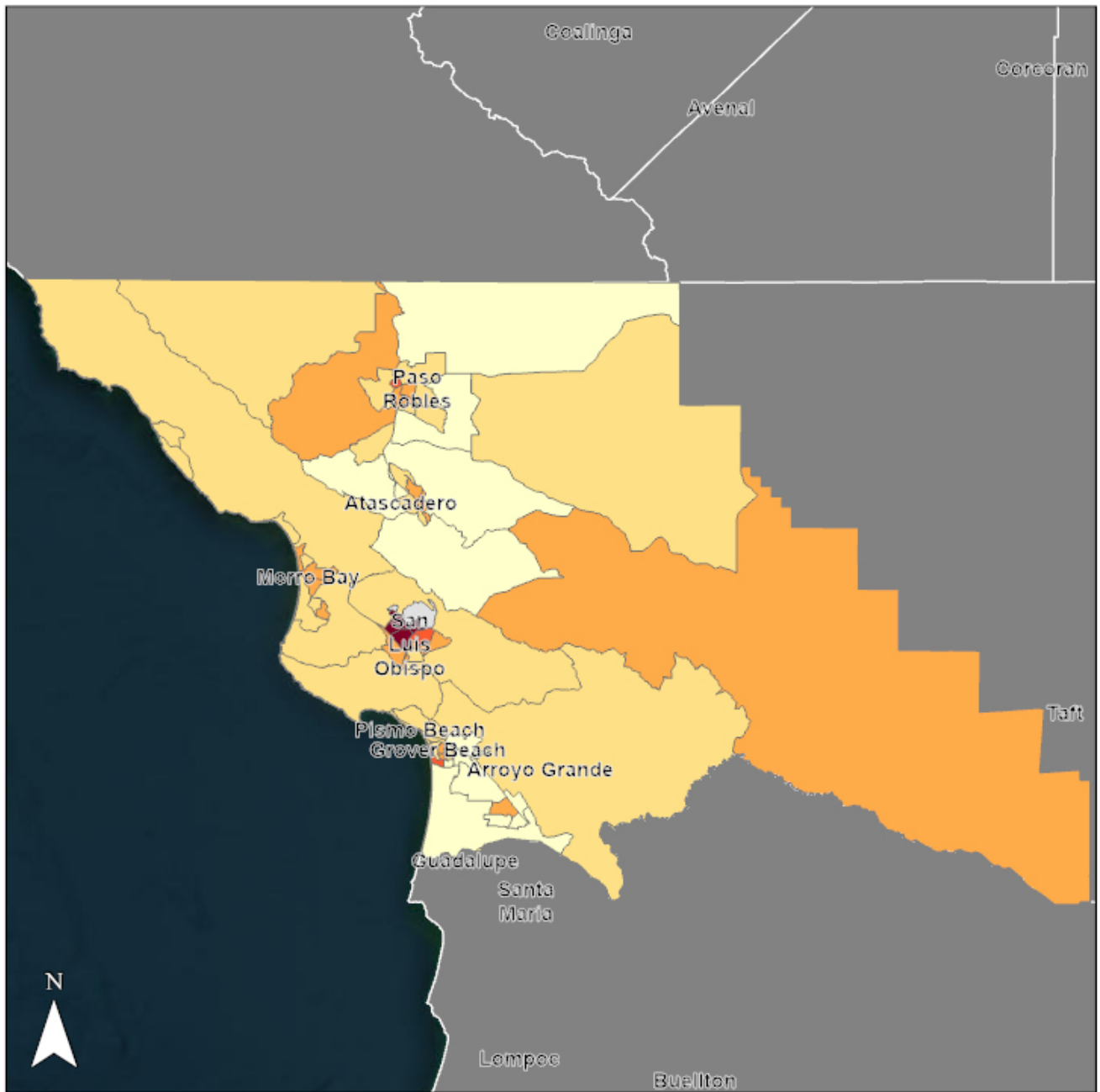
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Poverty rate by percentage	
0.0 - 5.0	20.0 - 30.0
5.0 - 10.0	30.0 - 40.0
10.0 - 20.0	40.0 - 100

Percentage of persons below by poverty estimate (2022)
 San Joaquin County by census tract

Data Source: 2018-2022 ACS 5-Year Estimates

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0 5 10 20 Miles

Poverty rate by percentage



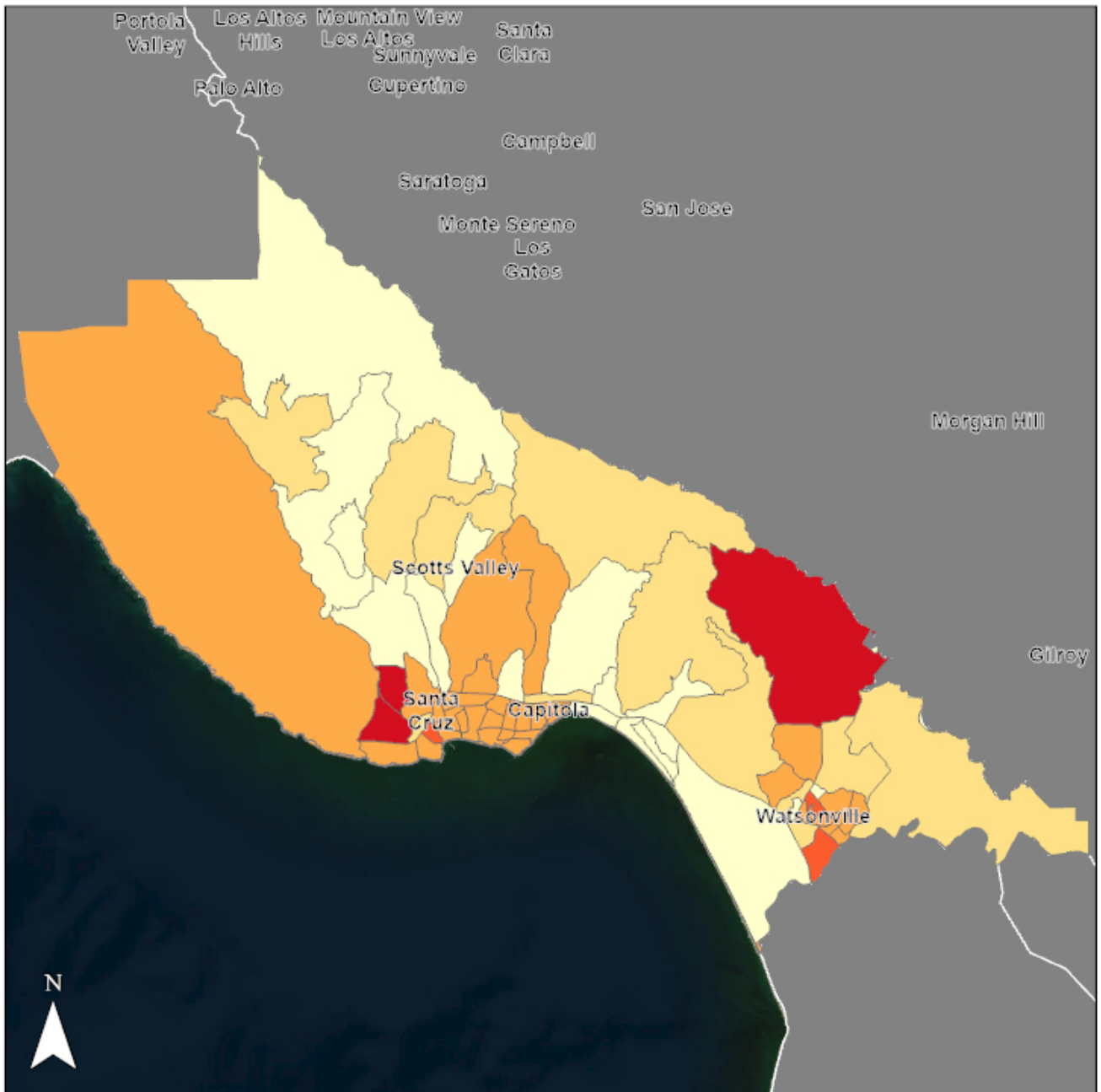
Percentage of persons below by poverty estimate (2022)

San Luis Obispo County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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0 2.5 5 10
 Miles

Poverty rate by percentage

0.0 - 5.0	20.0 - 30.0
5.0 - 10.0	30.0 - 40.0
10.0 - 20.0	40.0 - 100

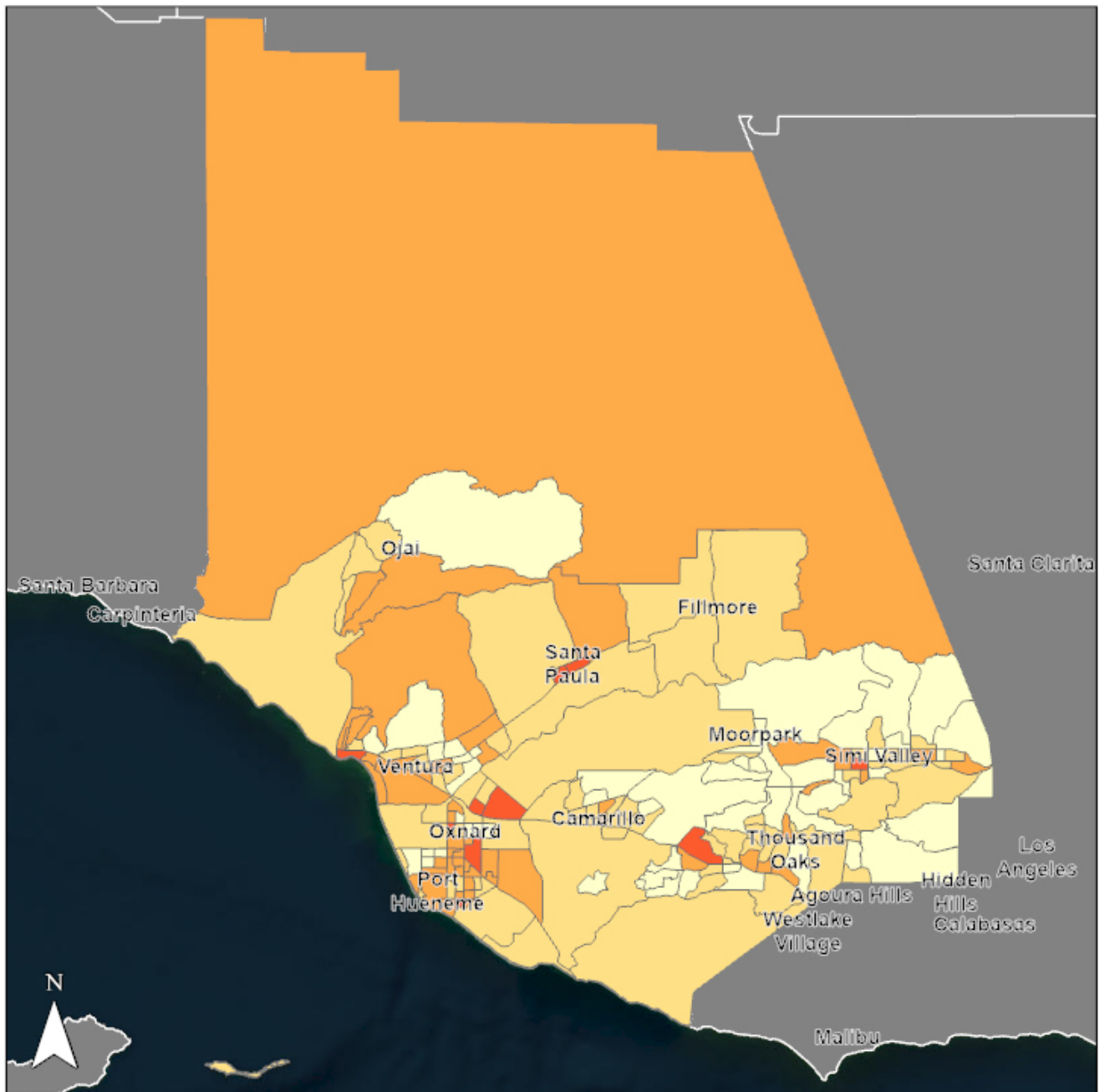
Percentage of persons below by poverty estimate (2022)

Santa Cruz County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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0 5 10 20 Miles

Poverty rate by percentage	
0.0 - 5.0	20.0 - 30.0
5.0 - 10.0	30.0 - 40.0
10.0 - 20.0	40.0 - 100

Percentage of persons below by poverty estimate (2022)
 Ventura County by census tract

Data Source: 2018-2022 ACS 5-Year Estimates

Demographic Profile of Impacted Counties

The counties impacted by DR-4683 represent a diverse range of demographics. The geographic spread of the disasters across the State of California results in a wide range of populations, geographies, housing inventories, resources, and challenges. The counties themselves represent a large range of populations – from low population density, rural counties to high density and urban counties.

The counties also exhibit differing needs regarding populations and access to resources. There is a considerable disparity between the lowest median household income counties (Mendocino at \$61,335) to the highest median household income counties (Santa Clara at \$153,792) and a similarly large difference for housing values and gross rent. The following section shows that many of the impacted counties rank among the top 80th percentile of vulnerability in the United States (Alameda, Merced, Monterey, Santa Barbara and Santa Cruz), while others fall into the lowest quartile of vulnerability in the country (Calaveras, Contra Costa, and Ventura). Some counties, like Merced and San Joaquin, have special challenges like a large, limited English proficiency population, or may have particularly large, unhoused populations.

Even the wealthiest, most well-resourced counties have pockets of vulnerability. For instance, San Mateo has the lowest poverty rate but still has 3.9 percent of the total population living in poverty. Every county also has a significant portion of people who may have additional challenges or needs in disaster and disaster recovery, including homeless populations, people over age 65, and people living with disabilities.

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

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

Social Vulnerability Index (SoVI)

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

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minority, speaks English “less than well,” multi-unit structure, mobile homes, crowding, no vehicle, and group quarters.³⁸

The CDC social vulnerability index is intended as a tool to help public health officials and local planners better prepare for and respond to disasters by estimating and planning for the needs of vulnerable populations. The SOVI can help counties calculate supply and emergency personnel needs to serve an area, identify areas in need of emergency shelters, plan evacuation methods for those without cars or with mobility issues, and identify or who may have special needs regarding evacuation, and to identify communities that may have access to greater resources during disaster response and recovery.³⁹

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

The most vulnerable disaster impacted counties include Alameda, Mendocino, Merced, Monterey, and Santa Cruz which are all in the top 70th percentile vulnerability in the country. Santa Barbara ranks in the top 90th percentile.

DR-4683 SOCIAL VULNERABILITY INDEX

County	Overall SoVI® Percentile Ranking
Alameda	87.72%
Amador	66.67%
Calaveras	0.00%
Contra Costa	12.28%
Mendocino	78.95%
Merced	80.70%
Monterey	84.21%
Sacramento	42.11%
San Joaquin	59.65%
San Luis Obispo	33.33%
San Mateo	35.09%
Santa Barbara	98.25%
Santa Clara	64.91%
Santa Cruz	82.46%
Ventura	22.81%

³⁸ Hallisey, Elaine et al. “A Social Vulnerability Index (SVI) from the CDC” Centers for Disease Control, n.d, https://svi.cdc.gov/Documents/Publications/CDC_ATSDR_SVI_Materials/SVI_Poster_07032014_FINAL.pdf

³⁹ Centers for Disease Control and Prevention. “CDC SVI Documentation 2018.”, January 31, 2020, https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2018.html

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Source: 2020 Center for Disease Control/Agency for Toxic Substances and Disease Registry Social Vulnerability Index

HUD Income Limits

Proposed disaster recovery and mitigation programs and projects must prioritize the protection of low-and-moderate income (LMI) persons and meet the overall LMI benefit national objective. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent must be expended to benefit the MID. As defined by HUD, LMI households earn a gross household income of under 80 percent of Area Median Income (AMI), adjusted for family size.⁴⁰ Statewide median income as of 2021 in California is \$90,100; a household of four is considered LMI if earning a gross income of \$64,850 or less⁴¹

STATEWIDE INCOME LIMITS

Household Size	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Extremely Low Income (30%)	\$22,400	\$25,600	\$28,800	\$32,000	\$34,600	\$37,150	\$39,700	\$42,250
Low Income (50%)	\$37,350	\$42,700	\$48,000	\$53,350	\$57,650	\$61,900	\$66,150	\$70,450
Low Income (80%)	\$59,750	\$68,300	\$76,850	\$85,400	\$92,250	\$99,050	\$105,900	\$112,750

Source: 2023 HUD Income Limits

The following figures provide a breakdown of the state's 2023 income limits by counties impacted by DR-4683.

INCOME LIMITS FOR EXTREMELY LOW INCOME DR-4683

County	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Alameda	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
Amador	19,250	22,000	24,860	30,000	35,140	40,280	45,420	50,560
Calaveras	20,050	22,900	25,750	30,000	35,140	40,280	45,420	50,560
Contra Costa	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
Mendocino	17,850	20,400	24,860	30,000	35,140	40,280	45,420	50,560
Merced	17,350	19,800	24,860	30,000	35,140	40,280	45,420	50,560
Monterey	25,300	28,900	32,500	36,100	39,000	41,900	45,420	50,560

⁴⁰ HUD. "Income Limits", May 15, 2023, https://www.huduser.gov/portal/datasets/il.html#2021_query

⁴¹ HCD. "2023 State Income Limits", June 6, 2023, <https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf>

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Sacramento	22,550	25,750	28,950	32,150	35,140	40,280	45,420	50,560
San Joaquin	18,450	21,050	24,860	30,000	35,140	40,280	45,420	50,560
San Luis Obispo	24,350	27,800	31,300	34,750	37,550	40,350	45,420	50,560
San Mateo	39,050	44,600	50,200	55,750	60,250	64,700	69,150	73,600
Santa Barbara	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
Santa Clara	37,450	42,800	48,150	53,500	57,800	62,100	66,350	70,650
Santa Cruz	34,600	39,550	44,500	49,400	53,400	57,350	61,300	65,250
Ventura	27,900	31,900	35,900	39,850	43,050	46,250	49,450	52,650

Source: 2023 HUD Income Limits

Race

Race is a protected class under the Fair Housing Act. As such, HCD assesses all programs to evaluate the equity and impact on protected classes. Disaster impacts vulnerable populations disproportionately due to “housing patterns, building construction, community isolation and cultural insensitivity.”⁴² A 2021 New York Times article entitled “Why Does Disaster Aid Often Favor White People” found that that white disaster victims often receive more disaster aid from FEMA than their Black neighbors. The report found that white residents of counties with significant disaster damage that received FEMA assistance had their wealth increase years later (five times as much, on average, as white residents who had not experienced FEMA assistance) while Black residents maintained less wealth in the same time period.⁴³

Ethnicity

A 2020 research study posits that Hispanic or Latino communities need special consideration in disaster planning processes and recovery in order to achieve equitable outcomes. The study found that vulnerable people were often not included in the planning process and suffered from the “slow violence” of emergency plans that overlooked their needs.⁴⁴ Examples include emergency information that is not available in Spanish, significant lack of insurance coverage available or affordable to immigrants. California has a large population of undocumented Latino/a and Indigenous immigrants, last estimated at 2.6 million residents. The study also found that immigrants may be

⁴² Fothergill, Maestas, and Darlington. “Race, ethnicity and disasters in the United States: a review of the literature.” *Disasters* vol. 23,2 (1999): 156-73. doi:10.1111/1467-7717.00111, <https://www.semanticscholar.org/paper/Race%2C-ethnicity-and-disasters-in-the-United-States%3A-Fothergill-Maestas/5fec2375586f6536ff3d45c8563c36d68b79a1ff>

⁴³ Christopher Flavelle, “Why Does Disaster Aid Often Favor White People?,” *The New York Times*, June 7, 2021, <https://www.nytimes.com/2021/06/07/climate/FEMA-race-climate.html>

⁴⁴ Méndez, Michael et al. “The (in)visible victims of disaster: Understanding the vulnerability of undocumented Latino/a and indigenous immigrants.” *Geoforum; journal of physical, human, and regional geosciences* vol. 116 (2020): 50-62. doi:10.1016/j.geoforum.2020.07.007, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7413658/>

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afraid to seek assistance after disasters due to fears of detention and deportation⁴⁵. Majority of DR-4683 impacted counties have Latino populations that make up at least 20 percent of the total county population. In the MID counties, in particular, Merced and San Joaquin counties, are majority Latino population.

ETHNICITY BY HISPANIC OR LATINO ORIGIN DR-4683

Hispanic or Latino Origin by County	Population Total:	Hispanic or Latino:	Percent Hispanic or Latino	MID
California	39,356,104	15,617,930	40%	
Alameda	1,663,823	369,603	22%	
Amador	40,577	6,140	15%	
Calaveras	45,674	6,197	14%	
Contra Costa	1,162,648	306,895	26%	
Mendocino	91,145	24,414	27%	
Merced	282,290	174,732	61%	X
Monterey	437,609	261,954	60%	
Sacramento	1,579,211	378,350	24%	
San Joaquin	779,445	331,382	43%	X
San Luis Obispo	281,712	65,946	23%	X
San Mateo	754,250	180,393	24%	
Santa Barbara	445,213	207,576	47%	
Santa Clara	1,916,831	476,352	25%	
Santa Cruz	268,571	91,923	34%	X
Ventura	832,605	370,200	44%	X

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates B03002 HISPANIC OR LATINO ORIGIN BY RACE

People with Disabilities

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

The American Community Survey measures six disability types:

- Hearing Difficulty, deaf or having serious difficulty hearing.

⁴⁵ Méndez, Michael et al. "The (in)visible victims of disaster: Understanding the vulnerability of undocumented Latino/a and indigenous immigrants." *Geoforum; journal of physical, human, and regional geosciences* vol. 116 (2020): 50-62. doi:10.1016/j.geoforum.2020.07.007, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7413658/>

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- Vision difficulty, blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive Difficulty because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory Difficulty, having serious difficulty walking or climbing stairs.
- Self-care difficulty, having difficulty bathing or dressing.
- Independent living difficulty, because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping.⁴⁶

Within the DR-4683, Calaveras, Amador, and Mendocino counties have the highest percent population with a disability, each with a population of more than 18 percent.

All CDBG-DR programs have an obligation to comply with relevant federal laws that prohibit discrimination on the basis of disability and to require physical accessibility and the provision/allowance of reasonable accommodations and reasonable modifications, including the federal Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act.

Percent of Population with Disability by County for DR-4683

Percent of Population with Disability by County	Total Population (non-institutionalized)	Total with Disability of All Types (non-institutionalized)	Percent	MID
California	38,874,540	4,275,158	11%	
Alameda	1,654,106	157,897	10%	
Amador	37,591	6,812	18%	
Calaveras	45,341	9,660	21%	
Contra Costa	1,157,711	130,100	11%	
Mendocino	90,359	16,931	19%	
Merced	279,730	35,696	13%	X
Monterey	422,849	38,882	9%	
Sacramento	1,565,603	192,518	12%	
San Joaquin	769,518	93,701	12%	X
San Luis Obispo	276,398	36,013	13%	X
San Mateo	750,550	65,466	9%	
Santa Barbara	437,957	47,547	11%	
Santa Clara	1,906,731	163,504	9%	
Santa Cruz	267,448	31,335	12%	X
Ventura	834,383	94,179	11%	X

⁴⁶ U.S. Census Bureau, “How Disability Data are Collected from the American Community Survey,” <https://www.census.gov/topics/health/disability/guidance/data-collection-acrs.html>

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Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S1810
 DISABILITY CHARACTERISTICS

Population 65 and Older

Senior households face special challenges and are disproportionately affected by disasters. Challenges for seniors may include owner-occupied households non-existent or inadequate insurance (due to a lack of resources, or because the mortgage has been paid off), individuals unable to access medication or care when medical systems are disrupted, or mobility or cognitive impairments that hinder safe evacuations, issues while may limit ability to evacuate. Data shows the percentage of population over 65 in disaster impacted counties. Amador, Calaveras, Mendocino and San Luis Obispo counties each have elderly populations that make up more than 20 percent of the county population.⁴⁷

Percent of Population over 65 by County in DR-4683

Percent of Population over 65 by County	Total Population	Population Aged 65 Years or Older	Percent	MID
California	39,356,104	5,865,300	15%	
Alameda	1,663,823	243,239	15%	
Amador	40,577	10,925	27%	
Calaveras	45,674	13,155	29%	
Contra Costa	1,162,648	190,307	16%	
Mendocino	91,145	21,197	23%	
Merced	282,290	32,222	11%	X
Monterey	437,609	62,381	14%	
Sacramento	1,579,211	230,399	15%	
San Joaquin	779,445	101,414	13%	X
San Luis Obispo	281,712	59,439	21%	X
San Mateo	754,250	127,520	17%	
Santa Barbara	445,213	70,948	16%	
Santa Clara	1,916,831	269,943	14%	
Santa Cruz	268,571	47,668	18%	X
Ventura	842,009	137,596	16%	X

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S0103
 POPULATION 65 YEARS AND OLDER

Population with Limited English Proficiency

The Civil Rights Act of 1964 prohibits discrimination on the basis of national origin and requires that government entities ensure that persons with Limited English Proficiency

⁴⁷ U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates, <https://www.census.gov/newsroom/press-kits/2021/acs-5-year.html>

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(LEP) have access to the same benefits, services, and information as English-speaking residents. As such, disaster preparedness and recovery must consider and plan for those who need translators and translated materials. Alameda, Contra Costa, Merced, Monterey, Sacramento, San Joaquin, San Mateo, Santa Barbara, Santa Clara, Santa Cruz and Ventura all have a percent population of people who speak English less than well that is over 10 percent of the population. Because disaster preparedness and recovery must include the need for translators and translated materials, it is important to assess which languages are commonly spoken in impacted areas. In every disaster impacted county, the majority of non-English speakers speak Spanish. A few of the larger counties also include a significant number of Indo-European and Asian or Pacific Island speakers as well.⁴⁸

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⁴⁸ U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates, <https://www.census.gov/newsroom/press-kits/2021/acs-5-year.html>.

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Percentage of limited English speakers

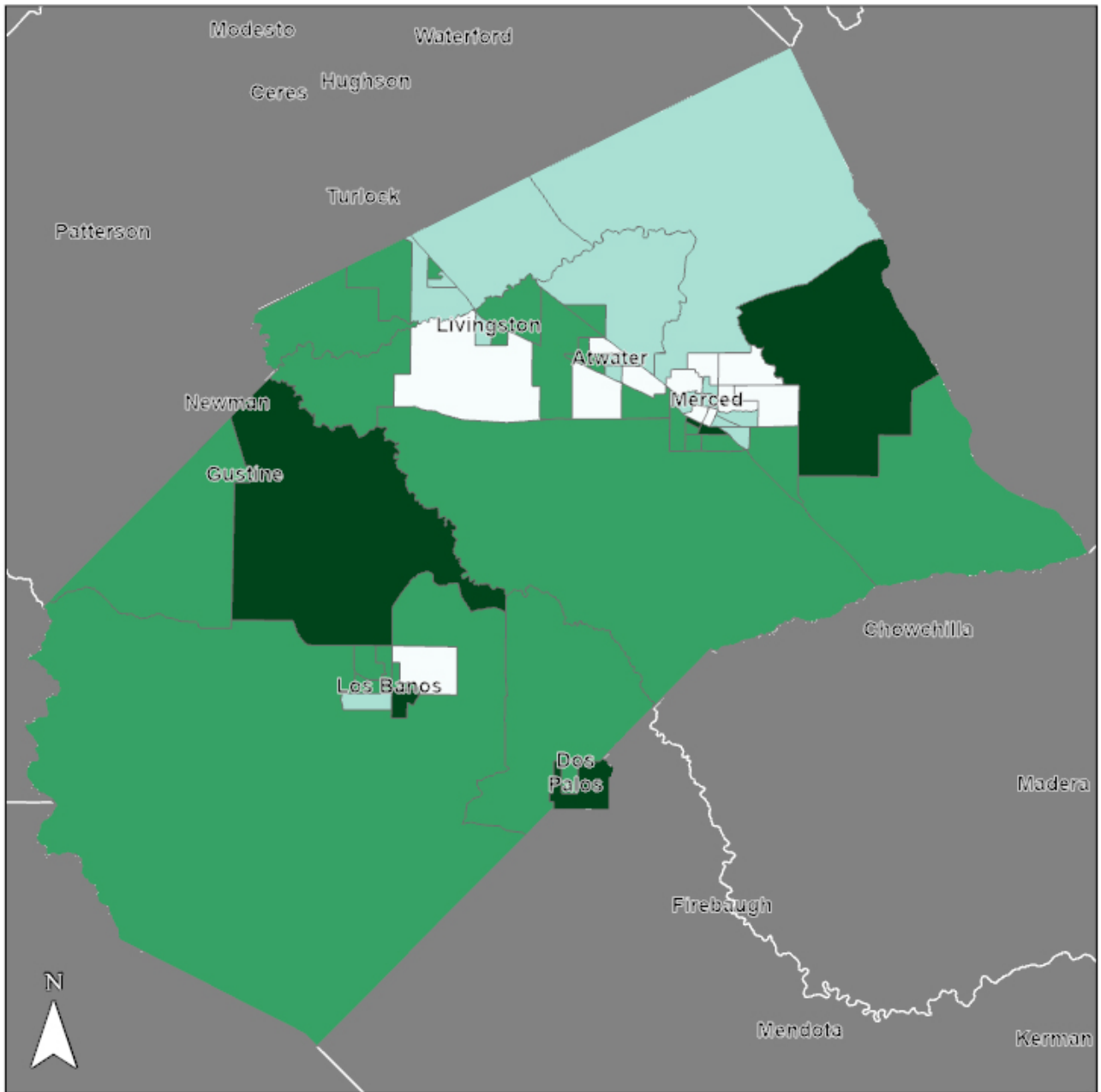
- 0.0 - 5.0
- 5.0 - 10.0
- 10.0 - 25.0
- 25.0 - 100

Percent of persons who speak English "less than well" of all languages (2022)
 DR-4683 counties by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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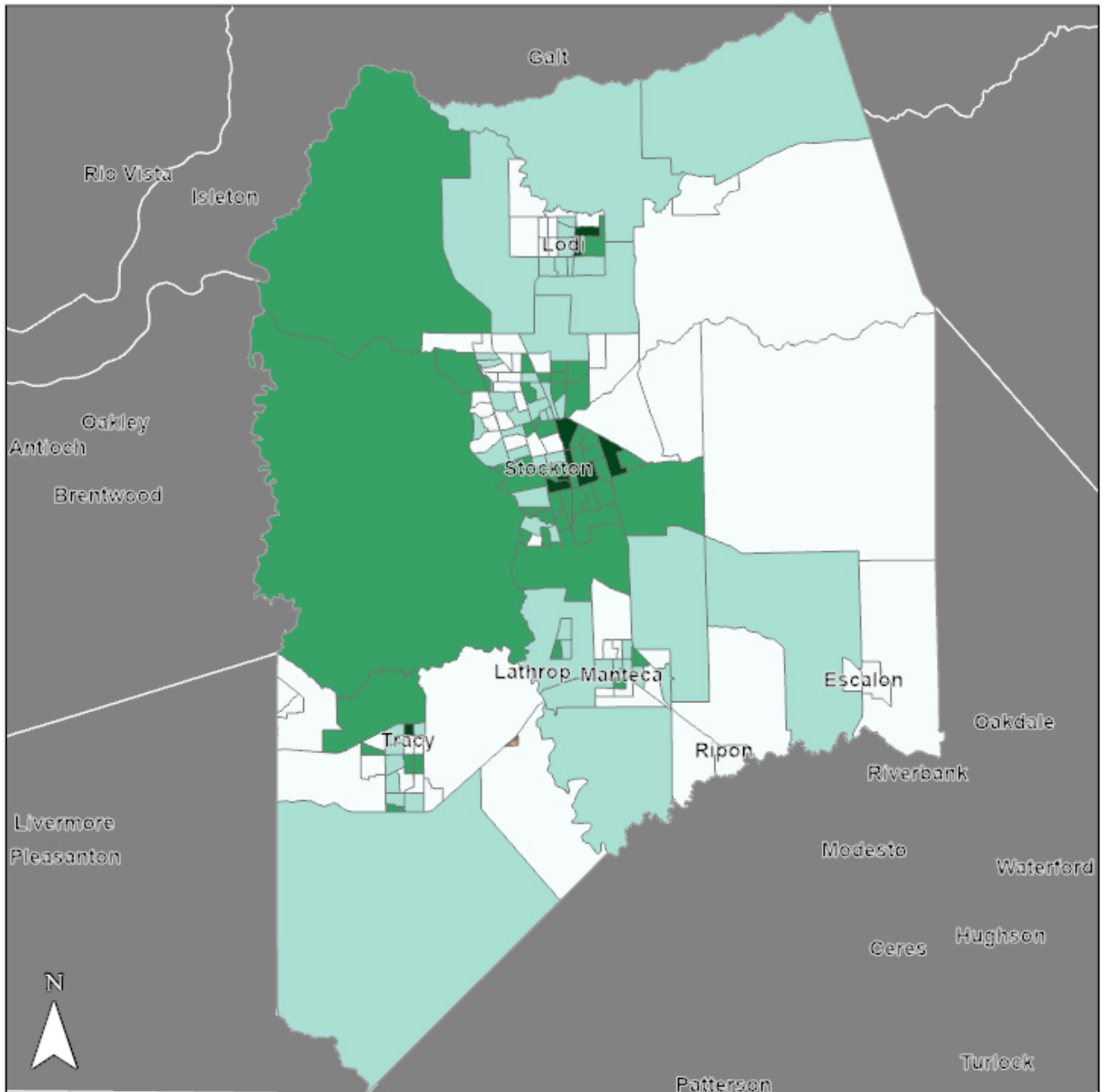


0 5 10 20 Miles

<p>Percentage of limited English speakers</p> <ul style="list-style-type: none"> 0.0 - 5.0 5.0 - 10.0 10.0 - 25.0 25.0 - 100 <p>Percent of persons who speak English "less than well" of all languages (2022) Merced County by census tract</p>	
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Data Source: 2018-2022 ACS 5-Year Estimates

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0 5 10 20 Miles

Percentage of limited English speakers

- 0.0 - 5.0
- 5.0 - 10.0
- 10.0 - 25.0
- 25.0 - 100

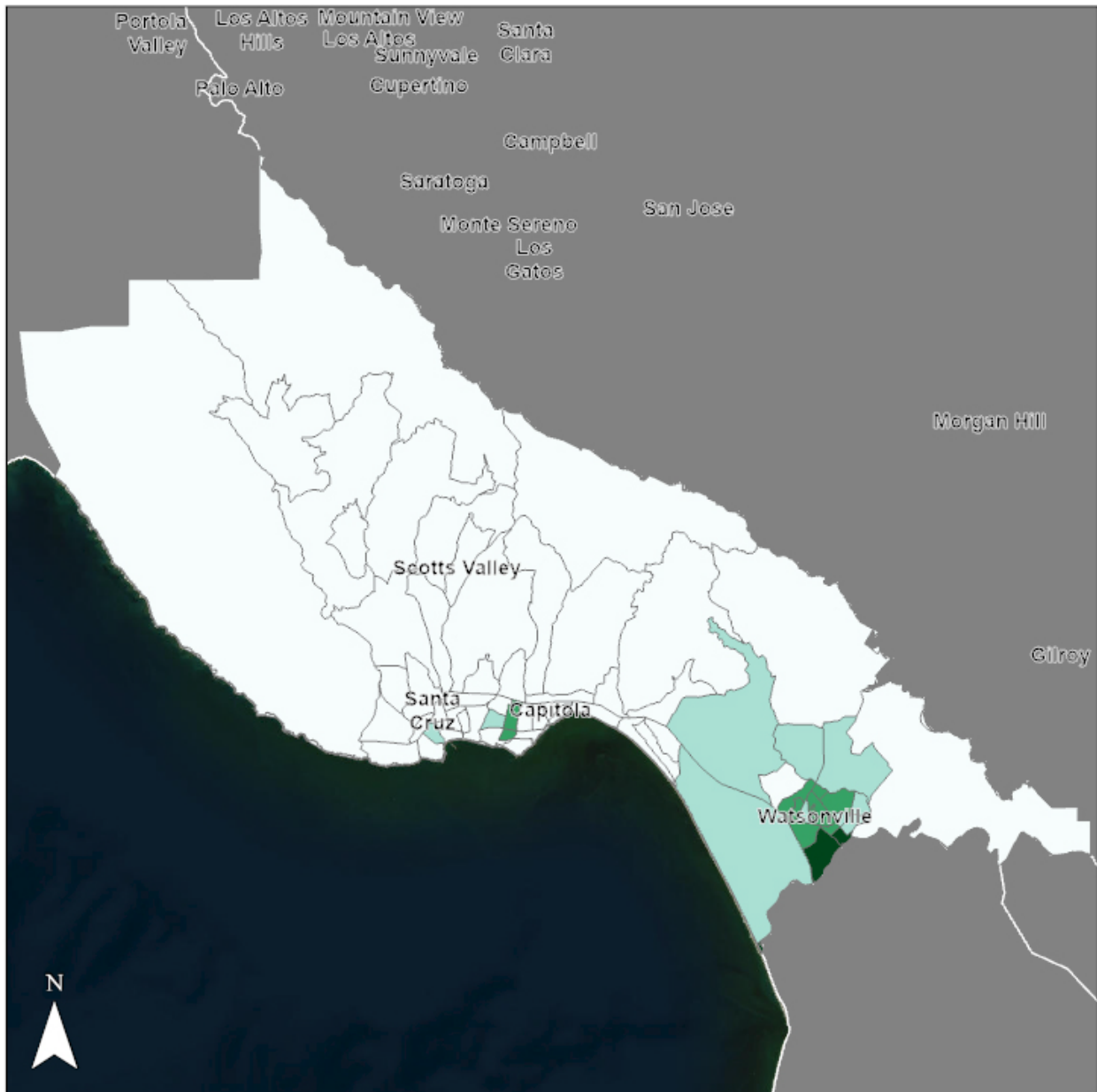
Percent of persons who speak English "less than well" of all languages (2022)
 San Joaquin County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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0 2.5 5 10
Miles

Percentage of limited English speakers

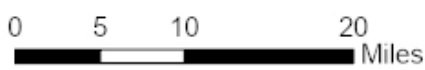
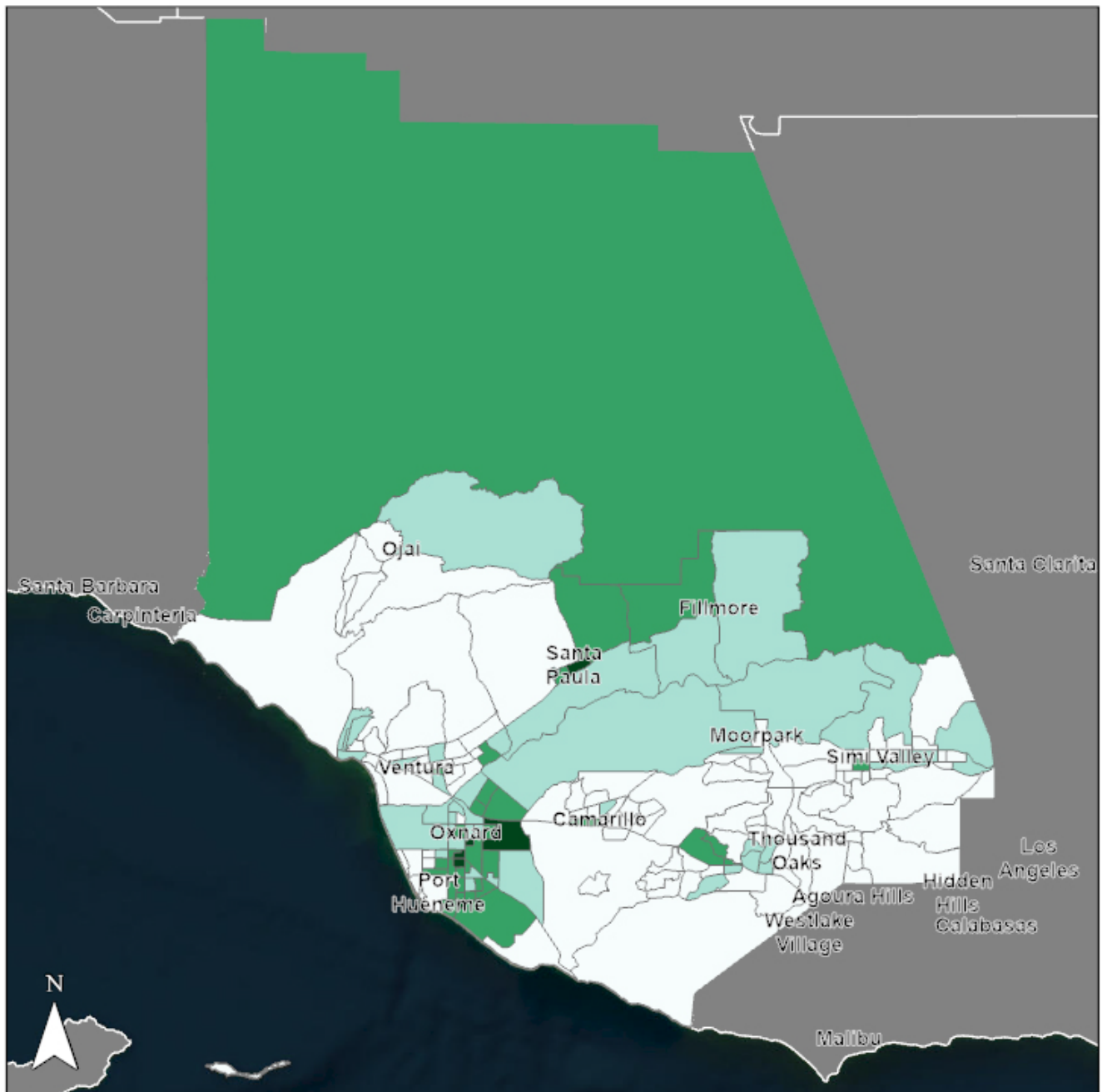
- 0.0 - 5.0
- 5.0 - 10.0
- 10.0 - 25.0
- 25.0 - 100

Percent of persons who speak English "less than well" of all languages (2022)
Santa Cruz County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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Percentage of limited English speakers

- 0.0 - 5.0
- 5.0 - 10.0
- 10.0 - 25.0
- 25.0 - 100

Percent of persons who speak English "less than well" of all languages (2022)
 Ventura County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

Housing Impact Cost Burdened Households

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as “cost burdened.” Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation, and childcare, and often lack adequate savings to spend on evacuation, shelter, or recovery from disaster scenarios.⁴⁹ Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. Every disaster impacted county population is on average 47 percent cost burdened.

Persons Experiencing Homelessness

Persons experiencing homelessness are especially vulnerable during disasters and require additional support during disaster recovery. Lack of permanent addresses or limited digital communications access can make locating and evacuating unhoused people very difficult, and the trauma of a major disaster can amplify any existing physical or mental health challenges. For people already struggling with housing and resource instability, a disaster and subsequent displacement can be disproportionately destructive.

The tables below illustrate a one-night count of unhoused people in each county. These counts measured the number of sheltered and unsheltered persons experiencing homelessness in each of the continuum of care regions, some of which are shared by multiple counties. Some of the counties share the same continuum of care regions and resources. Results of the one-night count ranged from 368 persons (Merced City and County CoC) to 7,708 persons (San Jose/Santa Clara City and County CoC). Additional data from the same point-in time count reveals that the majority individuals seeking shelter after disasters in impacted CoCs come from unhoused populations.⁵⁰

Addressing homelessness is an ongoing challenge for communities across California, but the state commits significant state resources for local governments including areas impacted by the 2023 disasters. The Governor’s 2024-25 budget proposes \$3.4 billion for nearly 30 homelessness related programs across state departments.⁵¹ This includes previously budgeted amounts of \$400 million for a third round of encampment resolution grants and \$1 billion for a fifth round of Homeless Housing, Assistance, and

⁴⁹ HCD. “Housing and Transportation”, n.d, <https://www.hcd.ca.gov/policy-and-research/intersectional-policy-work/housing-and-transportation>

⁵⁰ HUD. “CoC Homeless Populations and Subpopulations Reports”, 2023, <https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

⁵¹ State of California. “2024-25 State Budget Proposal Protects Core Priorities and Ensures Fiscal Stability”, January 10, 2023, <https://www.gov.ca.gov/2024/01/10/2024-25-state-budget-proposal-protects-core-priorities-and-ensures-fiscal-stability/>

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Prevention (HHAP) grants. HCD is a key agency in implementing these programs from federally funded programs to newer programs like Project Homekey⁵².

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

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

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

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

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

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

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

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

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

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

⁵² HCD. "Bringing California Home", January 17, 2024, <https://www.hcd.ca.gov/grants-and-funding/homekey>

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While shelter, addressing homelessness, supportive housing, and other efforts remain needs for areas impacted by the 2023 disasters, HCD proposes to utilize its proposed Multifamily to create long-term housing solutions to add units for low-income individuals in disaster impacted areas. The Outreach and Engagement section of this document provides additional detail on consultations with renters and homeowners displaced by the 2023 disasters.

Mobile Housing Units

Mobile homes are more vulnerable to disasters than permanent residential structures due to structural deficiencies and an increased likelihood of being in exposed, higher-risk areas. A recent case study of mobile home parks in flood-affected communities found that mobile home parks faced unique disaster vulnerabilities due to a high concentration socioeconomic instability, stigmatization by local government and community, and exclusion or disenfranchisement during post disaster recovery due to that stigmatization.⁵³

Mobile homes account for over 6 percent or more of the total housing stock in Mendocino, Merced, and Santa Cruz counties and reflect a substantial portion of homes damaged by the 2023 Winter storms. Mobile homes represent a significant portion of the non-deed restricted affordable housing stock in all DR-4683 identified MID counties.

Social and Public Service Programs

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

Case Management

Disaster Case Management is provided by local Disaster Case Manager Partners (DCMP) agencies throughout the state in the disaster impacted counties. In more rural areas, multiple counties may be served by the same organization. For instance,

⁵³Andrew Rumbach, Esther Sullivan, and Carrie Makarewicz, "Mobile Home Parks and Disasters: Understanding Risk to the Third Housing Type in the United States: Natural Hazards Review: Vol 21, No 2," Natural Hazards Review (American Society of Civil Engineers, January 21, 2020), <https://par.nsf.gov/servlets/purl/10318308>

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Catholic Charities Diocese of Fresno as of January 2023 was currently serving survivors of the 2023 flooding in Kern, Merced, Madera, Mariposa, and Tulare counties. In previous disasters, the State was told what a significant effort it is to get people’s homes and lives back together and that both the counties and the cities desperately need help building capacity.

Catholic Charities of California, an organization that coordinates the Disaster Case Management Program, provided the following table of case management activities and metrics through December 31, 2023.

CASE MANAGEMENT CASELOADS AND CLOSURES

Metric	DR-4683	Unassigned
Survivors Served (all dates)	882	Unknown
Survivors Served (open last day)	590	Unknown
Caseload (last day)	249	Unknown
Waitlist (last day)	353	Unknown
Referrals		Unknown
Number of Referrals Made	1,301	Unknown
Value	\$225,326.10	Unknown
Closures		Unknown
Total Survivors Closed	280	Unknown

Source: Catholic Charities of California - All Data Through 12/31/2023

The below tables regarding vulnerabilities of case management clients shows that DR-4683 saw many cases in which people had urgent basic needs, were uninsured/underinsured, or dealing with housing insecurity, poverty, or unemployment. Disaster DR-4683 also had many clients who spoke limited English or experience limited literacy (nine percent).

DR-4683 CASE MANAGEMENT VULNERABILITIES

Vulnerabilities	DR-4683 Number	DR-4683 Percent
Urgent Basic Needs	341	40%
Immediate Medical Needs	27	3%
Safety Risk	93	11%
Housing Insecurity	175	20%
Poverty	171	20%
Unemployment	221	26%
Elderly (65+)	100	12%
Minor Child (w/o adult)	11	1%
Single Head of Household	54	6%
Disabled	98	11%
Uninsured/Underinsured	126	15%
Isolated	24	3%

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Emotional Distress	111	13%
Limited Literacy	74	9%
Limited English	73	9%
Limited Transportation	12	1%
Limited Info. Access	7	1%
Functional Needs (AFN)	24	3%

Source: DCMP December 2023. Catholic Charities

Grantee Demographics and Disaster Impacted Populations

Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	39,356,104.00	100%	11,036,221.00	28.04%	2,454,027.00	6.23%
Under 5 years	2,258,308.00	5.70%	627,177.00	27.77%	143,103.00	6.33%
65 years and over	5,865,300.00	14.09%	1,869,301.00	28.80%	378,339.00	6.45%
Population with a Disability	4,275,158.00	11.00%	1,120,241.00	26.20%	290,924.00	6.80%
White or Caucasian	18,943,660.00	48.10%	5,150,714.00	27.19%	1,382,896.00	7.30%
Black or African American	2,202,587.00	5.60%	598,820.00	27.18%	84,488.00	3.83%
American Indian and Alaska Native	394,188.00	1.00%	40,422.00	10.25%	13,136.00	3.33%
Asian	5,949,136.00	15.10%	2,312,688.00	38.87%	239,237.00	4.02%
Native Hawaiian and Other Pacific Islander	150,531.00	0.40%	64,619.00	42.92%	8,360.00	5.55%
Other	6,388,999.00	16.20%	1,407,362.00	22.02%	336,821.00	5.27%

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates Demographics Characteristics, U.S. Bureau, 2015-2019 American Community Survey

Income Demographics

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Median Household Income	\$91,905.00	\$91,474.00	\$90,158.00
Per Capita Income	\$45,591.00	\$47,370.00	\$41,372.00

Source(s): Data Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S1901 INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)

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Income Demographics - Low Income

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	8.50	7.80	8.78

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S1901 INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)

LMI Analysis - Overall

Category	Total LMI Persons	Total Population	Percent LMI
Area wide	18,023,159.00	37,604,155.00	47.69%

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

LMI Analysis - Federally Declared Disaster Areas

County/Municipality	Non-MID Total LMI Persons	Non-MID Total Population	Non-MID Percent age LMI	MID Total LMI Person	MID Total Population	MID Percent age LMI
Non-MID Counties: Alameda, Amador, Calaveras, Contra Costa, Mendocino, Monterey, Sacramento, San Mateo, Santa Barbara, Santa Clara, MID Counties: Merced, San Joaquin, San Luis Obispo, Santa Cruz, Ventura	3,350,799	7,663,625	43.72%	1,017,295	2,298,105	44.27%

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

Manufactured Housing Units Impacted by Disaster

County/Municipality	Number of Units	% of Total Units in County/Municipality	Remaining Unmet Need
Santa Cruz	71.00	8.00%	\$13,950,000.00
Merced	176.00	19.00%	\$34,350,000.00
San Joaquin	236.00	25.00%	\$45,812,500.00
San Luis Obispo	328.00	38.00%	\$68,475,000.00
Ventura	94.00	10.00%	\$17,912,500.00
Total	905.00	100.00%	\$180,500,000.00

Source(s): Disaster Case Management Data Local Government Data

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Limited English Proficiency Population of Disaster-Related Areas

County/Municipality	Language	# of LEP Speakers	% of Total Population
Alameda	English	256,871.00	16.30%
Amador	English	1,216.00	3.10%
Calaveras	English	785.00	1.80%
Contra Costa	English	145,157.00	13.20%
Mendocino	English	7,066.00	8.20%
Merced	English	55,924.00	21.40%
Monterey	English	103,614.00	25.40%
Sacramento	English	197,072.00	13.30%
San Joaquin	English	123,723.00	17.00%
San Luis Obispo	English	14,600.00	5.40%
San Mateo	English	116,306.00	16.30%
Santa Barbara	English	67,934.00	16.20%
Santa Clara	English	356,915.00	19.70%
Santa Cruz	English	30,522.00	11.90%
Ventura	English	115,755.00	14.50%

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates B16008 CITIZENSHIP STATUS BY AGE BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH

Point-in-Time Count - Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area wide	34,996.00	8,581.00	110,451.00	154,028.00
FEMA Declared	8,546.00	2,112.00	28,217.00	38,875.00
MID	1,997.00	316.00	5,296.00	7,609.00

Source(s): HUDexchange.info, 2023 CoC Homeless Populations and Subpopulations Reports: <https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

Point-in-Time Count - Impacted by Disaster

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area wide	46,111.00	11,865.00	123,423.00	181,399.00
FEMA Declared	11,120.00	2,896.00	33,636.00	47,652.00
MID	2,570.00	485.00	5,960.00	9,015.00

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Source(s): HUDexchange.info, 2023 CoC Homeless Populations and Subpopulations Reports:
<https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

Assisted Housing Impacted by the Disaster

County/Municipality	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Merced	68	0.00	2,135	0.00	421	0.00	\$0.00
San Joaquin	232	0.00	4,240	0.00	992	0.00	\$0.00
San Luis Obispo	156	0.00	2,501	0.00	0	0.00	\$0.00
Santa Cruz	269	0.00	2,468	0.00	0	0.00	\$0.00
Ventura	63	0.00	7,077	0.00	1176	0.00	\$0.00
Total	788	0	18,421	0	2,589	0	\$0.00

Source(s): Local Government and Public Housing Authorities Data

b. Infrastructure Unmet Need.

Disaster Damage and Impacts - Infrastructure.

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

Although there is a clear need for infrastructure repair and improvements, this Action Plan focuses on unmet recovery needs with prioritization given to housing recovery and housing-related infrastructure projects. One reason for this prioritization is that although total project costs have been calculated, project eligibility has not been determined for all project worksheets submitted. Therefore, the local share figures are preliminary and likely to increase substantially moving forward. Second, after extensive outreach with local governments and NGOs, no infrastructure project was identified that would benefit LMI communities in DR-4683 MID identified counties. Other flood mitigation and resiliency needs, such as levee repair work was being funded by state resources through Department of Water Resources, or through Army Corps of Engineers.

FEMA PA projects fall under the following categories:

- Emergency Protective Work

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

TOTAL COST AND NEED BY PA CATEGORY

PA Category	Estimated PA Cost	Federal Resources	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$220,979,671.50	\$167,717,869.25	\$53,261,802.25	\$7,989,270.34	\$61,251,072.59
B - Emergency Measures	\$131,620,551.36	\$103,153,777.32	\$28,466,774.04	\$4,270,016.11	\$32,736,790.15
C - Roads and Bridges	\$344,942,167.54	\$258,706,626.04	\$86,235,541.50	\$12,935,331.22	\$99,170,872.72
D - Water Control Facilities	\$257,843,929.73	\$193,382,947.51	\$64,460,982.22	\$9,669,147.33	\$74,130,129.55
E - Building and Equipment	\$87,338,483.32	\$65,503,862.85	\$21,834,620.47	\$3,275,193.07	\$25,109,813.54
F - Utilities	\$92,757,072.29	\$92,757,072.29	\$0.00	\$0.00	\$0.00
G - Other	\$275,100,409.05	\$206,361,894.29	\$68,738,514.76	\$10,310,777.21	\$79,049,291.97
Total	\$1,410,582,284.79	1,087,584,049.55	\$322,998,235.24	\$48,449,735.28	\$371,447,970.52

Data Source(s): FEMA December 2023

FEMA PA Local Share Only for DR-4683 by Category

Category	Projects	Total Damage	Total Resources	Total Unmet Need
A - Debris Removal	574	\$220,979,671.50	\$167,717,869.25	\$53,261,802.25
B - Emergency Protective Measures	644	\$131,620,551.36	\$103,153,777.32	\$28,466,774.04
Total	66	\$352,600,222.86	\$270,871,646.57	\$81,728,576.29

Data Source(s): FEMA December 2023

FEMA PA Local Share Only for DR-4683 by Category

Category	Projects	Total Damage	Total Resources	Total Unmet Need
C - Roads and Bridges	689	\$344,942,167.54	\$258,706,626.04	\$86,235,541.50

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D - Water Control Facilities	261	\$257,843,929.73	\$193,382,947.51	\$64,460,982.22
E - Buildings and Equipment	344	\$87,338,483.32	\$65,503,862.85	\$21,834,620.47
F - Utilities	207	\$92,757,072.29	\$92,757,072.29	\$0.00
G - Parks, Recreational Facilities, and Other Items	574	\$275,100,409.05	\$206,361,894.29	\$68,738,514.76
Total	2075	\$1,057,982,061.93	\$816,712,402.98	\$241,269,658.95

Data Source(s): FEMA December 2023

Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$220,979,671.50	\$53,261,802.25	\$7,989,270.34	\$61,251,072.59
B - Emergency Measures	\$131,620,551.36	\$28,466,774.04	\$4,270,016.11	\$32,736,790.15
C - Roads and Bridges	\$344,942,167.54	\$86,235,541.50	\$12,935,331.22	\$99,170,872.72
D - Water Control Facilities	\$257,843,929.73	\$64,460,982.22	\$9,669,147.33	\$74,130,129.55
E - Building and Equipment	\$87,338,483.32	\$21,834,620.47	\$3,275,139.07	\$25,109,813.54
F - Utilities	\$92,757,072.29	\$0.00	\$0.00	\$0.00
G - Other	\$275,100,409.05	\$68,738,514.76	\$10,310,777.21	\$79,049,291.97
Total	\$1,410,582,284.79	\$322,998,235.24	\$48,449,681.28	\$371,447,970.52

Data Source(s): FEMA December 2023

Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need
Alameda	\$12,879,953	\$9,659,965	\$3,219,989
Amador	\$0.00	\$0.00	\$0.00
Calaveras	\$3,199,650	\$2,399,738	\$799,913
Contra Costa	\$0.00	\$0.00	\$0.00

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Project	Cost	Funding Source	Unmet Need
Mendocino	\$328,821	\$246,616	\$82,205
Merced	\$30,766,500	\$23,074,875	\$7,691,625
Monterey	\$0.00	\$0.00	\$0.00
Sacramento	\$0.00	\$0.00	\$0.00
San Joaquin	\$0.00	\$0.00	\$0.00
San Luis Obispo	\$4,916,760	\$3,687,570	\$1,299,190
San Mateo	\$0.00	\$0.00	\$0.00
Santa Barbara	\$700,000	\$525,000	\$50,000
Santa Clara	\$23,296,023	\$17,472,017	\$5,824,006
Santa Cruz	\$200,000	\$150,000	\$50,000
Ventura	\$200,000	\$150,000	\$50,000
Total	\$76,487,707	\$57,365,781	\$19,066,928

Data Source(s): CalOES – Dec 2023

c. Economic Revitalization Unmet Need.

Disaster Damage and Impacts - Economic Revitalization.

The SBA offers Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) to businesses to repair or replace disaster damaged property, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations such as charities, churches, and private universities are also eligible. The law limits these business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss. In total for Business and EIDL approved applications in 2023 disaster impacted areas, applicants requested over \$123 million in support, while only \$15.8 million has been dispersed to date. This leaves \$107.8 million in unmet needs for businesses in impacted areas.

TOTAL SBA BUSINESS LOANS APPROVED

County	Sum of Total Verified Loss	Sum of Total Amount Disbursed	Unmet Need
Alameda	\$11,446,236.83	\$1,025,700.00	\$10,420,536.83
Amador	\$1,082,181.78	\$56,800.00	\$1,025,381.78
Calaveras	\$967,478.48	\$143,500.00	\$823,978.48
Contra Costa	\$2,152,863.63	\$213,400.00	\$1,939,463.63
Mendocino	\$551,647.06	\$115,100.00	\$436,547.06
Merced	\$24,527,488.30	\$1,186,000.00	\$23,341,488.30
Monterey	\$1,185,491.10	\$226,100.00	\$959,391.10

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Sacramento	\$73,784.31	\$6,547.33	\$67,236.98
San Joaquin	\$8,006,657.86	\$2,528,300.00	\$5,478,357.86
San Luis Obispo	\$12,464,122.57	\$4,030,500.00	\$8,433,622.57
San Mateo	\$5,762,554.44	\$658,500.00	\$5,104,054.44
Santa Barbara	\$26,676,849.34	\$1,464,000.00	\$25,212,849.34
Santa Clara	\$3,736,590.00	\$0.00	\$3,736,590.00
Santa Cruz	\$12,526,465.87	\$2,866,000.00	\$9,660,465.87
Ventura	\$12,484,454.30	\$1,285,800.00	\$11,198,654.30
Total	\$123,644,865.87	\$15,806,247.33	\$107,838,618.54

Source: Small Business Administration, December 2023

SBA APPLICANT BREAKDOWN, EIDL AND BUSINESS LOANS – DR-4683

County	Approved	Auto Decline - Credit	Declined	Duplicate	Withdrawn	Grand Total
Alameda	17	6	22	1	25	71
Amador	3	1	11	0	7	22
Calaveras	4	1	8	1	5	19
Contra Costa	8	2	18	1	12	41
Mendocino	3	2	5	0	7	17
Merced	18	16	42	0	56	132
Monterey	8	3	16	2	13	42
Sacramento	21	18	51	7	47	144
San Joaquin	22	11	37	1	39	110
San Luis Obispo	53	6	57	4	83	203
San Mateo	17	6	18	2	31	74
Santa Barbara	36	5	67	4	29	141
Santa Clara	6	0	0	0	1	7
Santa Cruz	40	14	67	11	68	200
Ventura	13	7	16	1	29	66
Grand Total	269	98	435	35	452	1289

Source: Small Business Administration, December 2023

SBA ECONOMIC INJURY DISASTER LOAN, DR-4683

County	Total SBA EIDL Applications	Total Approved EIDL Applications	Total of EIDL Disbursed
Alameda	38	4	\$248,900.00
Amador	7	2	\$273,600.00
Calaveras	9	0	0
Contra Costa	40	5	\$570,400.00
Mendocino	9	3	\$142,400.00

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Merced	23	6	\$130,300.00
Monterey	53	10	\$2,077,900.00
Sacramento	65	10	\$866,700.00
San Joaquin	48	9	\$1,083,700.00
San Luis Obispo	50	5	\$926,600.00
San Mateo	29	3	\$603,500.00
Santa Barbara	45	9	\$485,800.00
Santa Clara	52	8	\$365,800.00
Santa Cruz	86	12	\$400,500.00
Ventura	32	8	\$1,324,800.00
Total	586	94	\$9,500,900.00

Source: Small Business Administration, December 2023

EIDL AND BUSINESS LOANS - DR-4683

County	Approved	Total Loans	Total Verified Loss	Total Distributed
Alameda	17	\$1,217,000.00	\$11,446,236.83	\$1,025,700.00
Amador	3	\$56,800.00	\$1,082,181.78	\$56,800.00
Calaveras	4	\$231,600.00	\$967,478.48	\$143,500.00
Contra Costa	8	\$501,400.00	\$2,152,863.63	\$213,400.00
Mendocino	3	\$131,700.00	\$551,647.06	\$115,100.00
Merced	18	\$3,516,700.00	\$24,527,488.30	\$1,186,000.00
Monterey	8	\$502,900.00	\$1,185,491.10	\$226,100.00
Sacramento	21	\$3,180,400.00	\$11,067,646.97	\$982,100.00
San Joaquin	22	\$2,848,600.00	\$8,006,657.86	\$2,528,300.00
San Luis Obispo	53	\$6,195,800.00	\$12,464,122.57	\$4,030,500.00
San Mateo	17	\$2,966,100.00	\$5,762,554.44	\$658,500.00
Santa Barbara	36	\$33,773,800.00	\$26,676,849.34	\$1,464,000.00
Santa Clara	6	\$3,730,800.00	\$3,736,590.00	\$0.00
Santa Cruz	40	\$4,748,100.00	\$12,526,465.87	\$2,866,000.00
Ventura	13	\$2,348,400.00	\$12,484,454.30	\$1,285,800.00
Total	269	\$65,950,100.00	\$134,638,728.53	\$16,781,800.00

Source: Small Business Administration, December 2023

d. Mitigation Only Activities.

The geographic breadth, unprecedented severity, and diversity of communities impacted by the 2023 Winter Storms creates unique challenges to recovery, as well as opportunities to integrate mitigation activities critical to the state's resilience to future disasters.

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

- A Mitigation Needs Assessment in this plan in addition to a disaster recovery-focused unmet needs assessment
- Proposed mitigation activities that clearly tie back to the 2023 disasters and the Mitigation Needs Assessment
- Proposed eligible activities that do not have a tie-back, but are tied to the Mitigation Needs Assessment and meet the HUD definition of mitigation
- Descriptions of how mitigation measures have been incorporated into recovery-related construction projects

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

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

Mitigation Funding Background

On November 27, 2023, the U.S. Department of Housing and Urban Development (HUD) allocated over \$142 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds appropriated by the Disaster Relief Supplemental Appropriations Act, 2023 (Public Law 117– 328). HUD allocated \$100,019,000 of that appropriation to the State of California for disaster recovery and mitigation activities as a result of the 2023 winter storms (DR-4683), with \$15,003,000 identified as a “CDBG-DR mitigation set-aside amount.”

HUD provided Federal Register Notice. The Notice provides definitions of mitigation activities, expenditure requirements, and funding timelines separate from the CDBG-DR allocation provided for the same disaster events.

Although Public Law 117– 328 tied the disaster recovery portion of the total allocation to the State of California to the winter storms, the mitigation set-aside intended to focus on preventative actions. The Notice requires that MIT funds respond to risks, based on a risk-based Mitigation Needs Assessment.

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

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- State of California's Hazard Mitigation Plan (SHMP)
- FEMA Local Mitigation Planning Handbook
- FEMA 2022-2026 Strategic Plan
- National Association of Counties, Improving Lifelines Brief,
- HUD Community Planning and Development (CPD) Mapping tool
- MID Local Hazard Mitigation Plans (LHMPs)
- Community Resilience Centers (CRC) Program
- CalOES's Joint Hazard Mitigation Strategy

The Mitigation Needs Assessment is updated to consider the California SHMP and LHMPs as they relate to the MIDs for the 2023 winter storms events that occurred from December 26, 2022 – January 31, 2023 (DR-4683).

Method

The Mitigation Needs Assessment builds on documents developed by the State of California to address state and local mitigation efforts including: the SHMP, the LHMPs, data collected from county resources, other California state agency planning documents, and the local stakeholder knowledge in disaster-impacted areas. The Mitigation Needs Assessment captures a point in time for the mitigation needs of the DR-4683 impacted areas and responds to requirements set forth in the FRN. If new risks are identified, or risks identified in this Action Plan are addressed, the state may update the Mitigation Needs Assessment through a non-substantial or substantial Action Plan Amendment.

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

State Hazard Mitigation Plan

The State of California's Hazard Mitigation Plan (SHMP) serves as the foundation for the Mitigation Needs Assessment. Drafted by the California Governor's Office of Emergency Services (Cal OES) and approved by FEMA in 2018, the SHMP is a federally mandated document that identifies hazards that could potentially affect California and lays out a state-wide plan to reduce loss of life and property that may be caused by a disaster. The SHMP underwent its latest update in August 2023. Cal OES led the development of the 2023 SHMP pursuant to 44 CFR part 201.4. For the 2018 SHMP, California utilized a State Hazard Mitigation Team consisting of horizontal and vertical stakeholder partners that met at least quarterly. For the 2023 SHMP, California adopted a Hazard and Working Group model. The Working Groups analyzed and counseled on overarching themes in the 2023 SHMP. The development of this Action Plan, as well as all California action plans and amendments since 2018, were directly informed by findings and risk assessment produced by the SHMP.

HUD requires an assessment of the State of California's most recent SHMP to inform the use of CDBG-DR funds for activities proposed in this plan. The following section provides an overview of the SHMP and examines the state's overall risks. As of January

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2023, the 2023 SHMP remains a significant guiding document for the development of this Mitigation Needs Assessment.

The 2023 SHMP arranged risk assessments into groupings of hazards with similar characteristics. While the SHMP addresses a host of disasters with potential to impact the state, earthquakes, floods, and fires are still considered California’s primary hazards. These three hazards have historically caused the greatest human, property, and/or monetary losses, as well as economic, social, and environmental disruptions within the state. They also have the greatest potential to cause significant losses and disruptions in the future. Past major disaster events have led to the adoption of statewide plans for mitigation of these hazards, including the California Earthquake Loss Reduction Plan, State Flood Hazard Mitigation Plan, and California Fire Plan.

As a result of the frequency, intensity, and variety of California’s past natural disasters, earthquake, flood, and fire hazards have long been identified as the State of California’s main hazards of concern, including the findings of the 2023 SHMP. For flooding impacts specifically, 38 counties in California identified flooding as a high-risk hazard and 16 considered it medium risk. All 5 DR-4683 MID counties identified flooding as a high-risk hazard within their Local Hazard Mitigation Plans (LHMP).

2023 IMPACTED COUNTIES BY HIGH FLOOD RISK

Flood	High	Amador, Mendocino, Merced , Monterey, Sacramento, San Joaquin , San Luis Obispo , Santa Clara, Santa Cruz , Ventura
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Source: 2023 SHMP, Section 2-13, page 71

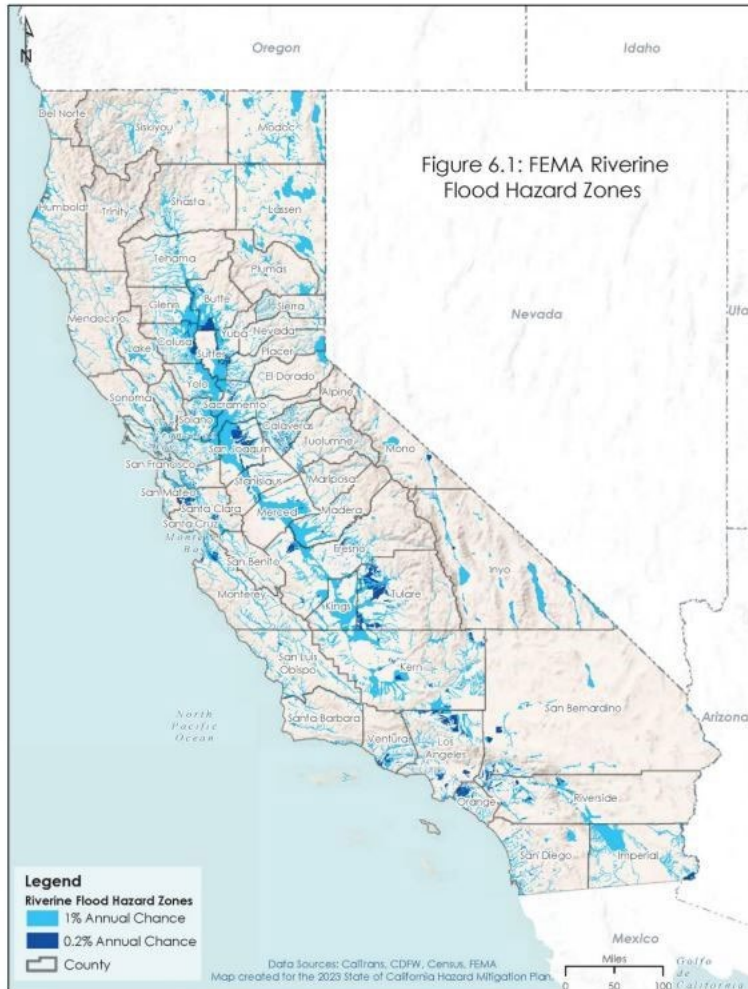
Probability of Flood Hazards Statewide

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

The figure below, produced by the California Department of Water Resources, shows the flood hazard areas through the state. The areas designated for one percent and .2 percent flood hazards align with major rivers and delta systems that run through the Central Valley and Sacramento regions, as well as other significant watersheds and reservoirs across the state.

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Source: 2023 California State Hazard Mitigation Plan, Section 6.5, page 161

Climate Change and Flood Hazards

Climate change impacts are already being felt throughout the State of California, including the disaster-impacted counties. Impacts are reflected in the reduction of precipitation in some regions and an increase in severity and frequency of flooding in other regions. Change in snowfall or rainfall patterns can also contribute to a severe increase in flooding events. Climate change impacts the variability, intensity, frequency, and seasonal patterns of California's primary hazards. For example, larger and more frequent wildfires brought on by climate change reduce the ability of a landscape to retain rainfall, which often leads to flooding and mudflows. Every region in California experiences climate impacts but population vulnerability, scale, and severity vary statewide.

Joint Hazard Mitigation Strategy

The Joint Hazard Mitigation Strategy (April 2023) is a partnership between California Governor's Office of Emergency Services (Cal OES) and Federal Emergency Management Agency (FEMA) Region 9 to identify actions, goals and objectives for federal designated counties (DR-4683) damaged by the 2023 storm events, flooding, landslides and mudslides. The Joint Hazard Mitigation Strategy was a valuable resource to inform HCD of the appropriate uses of CDBG-DR funds for activities proposed in this plan.

Hazard Mitigation is defined in the Joint Hazard Mitigation Strategy and by FEMA as any sustained action taken to reduce or eliminate long-term risk to people and property from hazards and their effects. The intent is to enhance the communities' ability to prepare for and recover from future hazardous events by providing resources for identifying risks and vulnerabilities, establishing short and long-term strategies for protecting people and property as well as developing and implementing plans that will increase community resilience.

Goals and objectives of the Joint Hazard Mitigation Strategy

1. Partner with communities to identify, develop, and fund projects that reduce loss of life and injuries from future hazard events. Specifically, engage with communities to develop projects that achieve one or more of the following goals:
2. Protect a disadvantaged community
3. Implement a nature-based solution to reduce risk and/or advance climate adaption goals
4. Advance whole community risk reduction
5. Protect large critical infrastructure
6. Build local capacity in historically underserved or socially vulnerable communities to develop local hazard mitigation plans and to identify, develop, and fund equity-centered mitigation projects
7. Prioritizing whole community plans that create a better picture of the risks to a planning area
8. Building State, Local, and Tribal Capacity
9. All decisions and actions executed in this operation need to be designed with the intent of building State, Local, and Tribal capacity.

The highest priorities, in order of highest priority first, for Hazard Mitigation Grant Program (HMGP) project funding include 1) Development and updating hazard mitigation plans statewide, 2) Advance assistance for HMGP programs, 3) Shovel-ready and phased projects that meet certain criteria, 4) Planning activities, advance assistance, etc. for non-socially vulnerable communities.

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Winter Storm events of 2023

From an incident period between December 26, 2022, to January 31, 2023, a total of nine atmospheric rivers in rapid succession drenched the state of California from north to south and back again with an estimated 32 trillion gallons of water, punctuated by days of damaging wind gusts. Widespread flooding, landslides, mudslides, and power outages occurred statewide. Heavy snowfall was seen in the eastern Sierra Nevada California mountain ranges, with totals up to 15 ft in the higher elevations. A total of 23 flash flood warnings were issued, and a total of five Moderate Risks for excessive rainfall were issued by the Weather Prediction Center. During this timeframe, several rivers exceeded their flood stage, with some even reaching their preliminary flood of record. The events tapered off around January 17, 2023, and the incident period closed on January 31, 2023.

LHMP discussions

California’s Local Hazard Mitigation Plans (LHMPs) provide critical hazard and risk information for each county in the state as well as actionable and localized mitigation approaches identified by its authors. The table below illustrates which hazards each MID county identified as threats to their jurisdiction in their most recent LHMP. As seen below, the most commonly identified hazards in the areas designated as MIDs for DR-4683 are wildfires, floods, and earthquakes. This consistency bolsters the SHMP’s state-wide hazard rankings and reinforces the prioritization of wildfire mitigation strategies in the state’s long-term recovery plan. Flooding is also identified as a primary hazard as evidenced by the mudslides and debris flows. Although earthquakes are identified as a primary hazard, due to the nature of disasters that triggered the funding, the focus of the mitigation approaches will be on flooding.

Local Hazard Mitigation Plans – Top Hazards

Hazard Mitigation Plans	Merced Multi-Jurisdictional HMP 2021	San Joaquin County LHMP 2023	San Luis Obispo County LHMP 2019	County of Santa Cruz LHMP 2021	Ventura County Multi-Jurisdictional HMP 2022
Agriculture Pest and Disease					
Climate Change		X		X	
Cyber Attack					
Dam Incidents					X
Drought	X	X	X	X	X
Earthquake		X	X	X	X
Flood and Levee Failure	X	X		X	X
Hazardous Materials					
Landslide		X		X	X

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Pandemic/Epidemic					
Sever Weather or Storms	X				X
Tsunami		X		X	X
Wildfire	X	X	X	X	X
Other Human Caused Hazard					

Source: DR-4683 MID Counties LHMPs

Threat to Community Lifelines

The following section identifies risks to indispensable services and community lifelines for the State of California. In July 2023, FEMA updated their Community Lifelines Implementation Toolkit which focuses on eight categories of Community Lifelines. FEMA defines these lifelines as enabling the continuous operation of critical government and business functions and are essential to human health and safety or economic security. Lifelines are the most fundamental services in the community that enable all other aspects of society to function. Lifelines are the integrated network of assets, services, and capabilities that are used day-to-day to support the recurring needs of the community. When a lifeline is affected by a disaster, survivors may experience disruptions which reduce their ability to receive critical services and recover from the effects of the incident.

- **Safety and security** - The destruction of communications infrastructure by flooding impacts first responder communications and emergency notification capabilities. Cellular communications, broadband, radio, and television infrastructure are susceptible to damage by flooding and can leave responders unable to coordinate and residents unable to receive critical evacuation or shelter orders.
- **Food, hydration, shelter** – Flooding can cause major property damage and destroy houses or other structures which creates a need for emergency shelter during evacuations. Flooding can also disrupt food distribution or food chains if flooding occurs in agricultural areas.
- **Health and medical** - Flood disasters create medical and public health hazards. Survivors must be triaged, immediate medical needs assessed, and long-term medical care that may have been disrupted, such as prescriptions or regular treatments, must be addressed. Field facilities providing medical treatment need supplies and medicine, which may need to be coordinated with first responders and government officials. Animals are often a concern as well. Often veterinary care and safe housing for pets and service animals is required, in addition to addressing citizen needs.
- **Energy** - Energy delivery systems (electricity, natural gas, oil) impact the ability of residents and first responders to access internet, phone, radio, and television. Disruption to energy delivery systems can adversely affect critical medial services and water infrastructure (i.e., water pumps) if redundant systems are not

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operationalized (i.e., emergency generators). Issues with downed powerlines can block roadways, stopping egress and ingress of residents and first responders.

- **Communications** - The destruction of communications infrastructure by flooding severely impacts first responder communications and emergency notification capabilities. Cellular communications, broadband, radio, and television infrastructure are susceptible to damage by flooding and can leave responders unable to coordinate and residents unable to receive critical evacuation or shelter orders.
- **Transportation** - Transportation infrastructure (i.e., highways, bridges, railways) are susceptible to flooding which can severely impact emergency response and emergency evacuations of residents. The SHMP identifies the washout of State Route 74 during the February 2019 flash floods in Riverside County, which impacted movement of residents and emergency response capabilities.
- **Hazardous Material** - Management of hazardous materials and containment of those materials during a disaster event are critical to public safety. Uncontained hazardous materials during a disaster can affect the ability of first responders to provide search and rescue. Such materials may also exacerbate additional hazards in a disaster situation. Community leaders and service providers must coordinate with facilities to identify existing security gaps.
- **Water Systems** - Water storage facilities and delivery systems are at serious risk of flooding impacts. For example, increased runoff from rain events can overload storage capacity in dams and reservoirs, creating spillovers. Serious rain events can cause levee or dam failure.

COMMUNITY LIFELINE COMPONENTS

Safety & Security	Food, Hydration & Shelter	Health and Medical	Energy	Communications	Transportation	Hazardous Material	Water Systems
Law Enforcement/ Security	Food	Medical Care	Power Grid	Infrastructure	Highway/ Roadway/ Motor Vehicle	Facilities	Potable Water Infrastructure
Fire Service	Hydration	Public Health	Fuel	Responder Communications	Mass Transit	HAZMAT, Pollutants, Contaminant	Wastewater Management
Search and Rescue	Shelter	Patient Movement		Alerts, Warnings, and Messages	Railway		
Government Service	Agriculture	Medical Supply Chain		Finance	Aviation		
Community Safety		Fatality Management		911 and Dispatch	Maritime		

Source: FEMA Community Lifelines Implementation Toolkit V 2.1, page 13

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

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

Risk Assessment

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

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

STATEWIDE HAZARDS BY COMMUNITY LIFELINE (1 OF 2)

Hazard	Safety and Security	Food, Hydration, Sheltering	Health and Medical	Energy
Agricultural Pest/Invasive species	Very Low Threat	Extreme Threat	Moderate Threat	Very Low Threat
Dam Failure	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Climate Change	High Threat	High Threat	High Threat	High Threat
Earthquake	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Flood	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Hazardous Material Release	High Threat	High Threat	High Threat	Moderate Threat
Landslide and Other Earth Movements	Extreme Threat	Extreme Threat	Moderate Threat	High Threat

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Severe Weather/Storms	Moderate Threat	Moderate Threat	Moderate Threat	High Threat
Tsunami	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Wildfire	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Other Human-Caused Hazards	Moderate Threat	Moderate Threat	Moderate Threat	Moderate Threat

Source: FEMA Community Lifelines Implementation Toolkit.

STATEWIDE HAZARDS BY COMMUNITY LIFELINE (2 OF 2)

Hazard	Communication	Transportation	Hazardous Material	Water Systems
Agricultural Pest/Invasive species	Very Low Threat	Very Low Threat	Very Low Threat	Low Threat
Dam Failure	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Climate Change	High Threat	High Threat	High Threat	Extreme Threat
Earthquake	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Flood	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Hazardous Material Release	Moderate Threat	High Threat	High Threat	High Threat
Landslide and Other Earth Movements	High Threat	Extreme Threat	High Threat	High Threat
Severe Weather/Storms	High Threat	Moderate Threat	Low Threat	High Threat
Tsunami	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Wildfire	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Other Human-Caused Hazards	Moderate Threat	Moderate Threat	Moderate Threat	Moderate Threat

Source: FEMA Community Lifelines Implementation Toolkit.

Community Resilience Center Program

The Community Resilience Center (CRC) Program under the California Strategic Growth Council (SGC) will fund new construction and upgrades of neighborhood-level resilience centers to provide shelter and resources during climate and other emergencies, such as extreme heat events and poor air quality days. The program will also fund ongoing year-round community services and programs, such as food distribution and workforce development training, that build overall community resilience.

The Community Resilience Centers (CRC) program intends to build both climate resilience and community resilience across California. The program will fund physical infrastructure, including retrofits and new construction of facilities and accompanying campus amenities, as well as social infrastructure, including integrated delivery of services and programs to share knowledge, build networks, and strengthen capacity. CRC projects should balance shorter-term needs and longer-term needs, equip CRC Facilities with emergency activation capabilities and plans, and include year-round delivery of services and programs that build community resilience. CRCs also prioritize the most vulnerable residents and communities in their decision-making, design, and implementation.

Goals and objectives of the Community Resilience Center (CRC) program

1. Offer multi-benefit physical community-serving spaces, resilient to current and future climate hazards;
2. Provide integrated delivery of essential services and programming to local communities during disasters, emergencies, and disruption events, as well as year-round to address ongoing community needs and build community cohesion;
3. Integrate physical infrastructure projects with social infrastructure, through community driven partnerships and programming to increase climate resilience, expand economic opportunities, and reduce health, environmental, and social inequities across California.
4. Leverage and build a skilled, diversified, and trained workforce and promote local workforce development and training opportunities, with a focus on preparing community members for high-quality career pathway jobs in a future net zero carbon economy that are resilient to current and future climate change impacts; and to
5. Build, strengthen, and sustain local leadership and grassroots engagement in civic and community development, and climate resilience awareness and activities.

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The CRC program intends to balance both shorter-term emergency response needs, as well as longer-term ongoing community needs and services. Examples of shorter-term emergency response include HVAC improvements, food distribution, backup power, emergency preparedness presentation and trainings. CRCs are required to provide certain functions such as activation 24/7 in an emergency, provide necessary infrastructure for weather respite (heating, cooling, clean air centers or hydration stations), or act as evacuation or emergency response centers. CRCs must also have required features like ADA-compliant facilities, showers, shelter for people to sleep during emergencies, refrigeration, laundry services, etc. A key component of the CRC program is to achieve racial equity in operations, investments, and policy initiatives across statewide. While all communities are eligible to apply, targeted work will occur to prioritize and reach out to priority communities. Priority communities include those that are under-resourced meaning they are classified as a disadvantaged census tract, have a median household income at or below 80 percent the statewide median income, or meet HCD's threshold of low-income designation.

Statewide flooding

In terms of recent disasters and the probability of future destruction at increasing magnitudes, floods represent one of California's most destructive sources of hazard, vulnerability, and risk. 15 percent of the State's population lives within a 1% and 0.2% annual chance flood hazard area. Even more alarming, it is estimated that 41% of that population is identified as living in an equity priority community.

Types of Flooding

Riverine flooding occurs when rivers, streams, or lakes overflow their banks and adjacent areas are subject to excess runoff or accumulation of flowing water over areas.

Flash flooding is sudden, rapid flooding of low-lying areas usually caused by intense rainfall. It can be highly destructive such as dam failure, and can severely damage infrastructure, roads or buildings.

Localized flooding occurs when drainage systems are overwhelmed during or after rain events and causes pooling of water, creating flooding in local streets, yards or in structures.

Alluvial fan flooding occurs on alluvial fan landforms and are caused by sediment erosion from an upland water source.

Flood Risk

Flood Insurance Rate Map (FIRM) are created by FEMA for use by communities to know which areas have the highest risk of flooding. FEMA maintains, updates data and assesses risk for areas to determine the likelihood of an area to flood. These maps

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delineate the Special Flood Hazard Areas (SFHAs), the Base Flood Elevations (BFEs) and the risk premium zones applicable to the community. Places with a 1% or higher chance of experiencing a flood each year are considered to be high risk areas. These measurements reflect statistical averages only, and it is possible for two or more floods with a 1% annual chance to occur in close timeframe. These maps are important in use for community planning efforts as they can help make informed decisions of where to make infrastructure improvements and lessen risk to people or property.

All areas have risks of flooding, but some areas have a lower or more moderate risk than others. In California, every region can experience flood in a variety of forms including flash floods or alluvial fan flooding. Between 1950 to 2022, California had 161 Federal or State emergency declarations related to flooding. On average, California experiences more than 20 flash flood events and just under 20 flood events per year. Certain parts of the state are more prone to flooding than other areas, and the frequency and damage caused by flood events can vary. While flood risk varies across the state, flooding damage can occur more frequently as more development is increasing within floodplain regions.

Climate Change Adaptation Strategies/Hazard Mitigation

According to the 2023 SHMP, adapting to the changing climate will require an approach to hazard mitigation that prioritizes long-term community resilience practices. Such practices aim to reduce harm for those who experience greater risk and burden of harm due to historical and current marginalization and under-investment, thus resulting in greater resilience across the whole community. Climate change is projected to continue in frequency, duration and intensity so greater preparation and planning for vulnerable communities ultimately supports the long-term goal of risk reduction. It is projected that the frequency and severity of flooding events will increase over the next 30 years due to climate change impacts.

RETROFIT/CLIMATE MITIGATION STRATEGIES

Temperature/extreme heat/wildfire	Flooding	Storms
Cool roof or light colored/reflective surfaces	Wet or dry floodproofing	Impact-rated windows, doors, garages, storm shutters, wind rated materials
Green roofs/green facades with vegetation, community gardens	Elevation of entire building or utilities	Sealed windows and exterior walls/roofs

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HVAC systems, energy efficient appliances, generators, solar panels	Repurpose ground floor or fill in of basements	Connection of structural elements, strengthened roof deck
Features such as windows, blinds, curtains, exterior features	Water resistant materials (replace drywall with water-resistant materials like concrete or tile, also reduces risk of mold)	
High efficiency fixtures, labeled with EPA's Water Sense program.	Rainwater catchment systems, retention basins	
Enhanced air filtration/ember resistant vents, wildfire resistant roof, non-combustible materials		

Source: Resilient Retrofits, Climate Upgrades for Existing Buildings (2022)

Additional Environmental Hazards

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

Pollution burden includes both exposures to ozone concentrations, traffic, pesticides, PM2.5 concentrations, diesel PM emissions, drinking water contaminants, children's lead risk from housing, use of certain high-hazard, high volatility pesticides, and toxic releases from facilities. Black and Latino Californians both disproportionately reside in high pollution burden areas and are disproportionately impacted by high pollution burdens. Pollution not only leads to major health issues like asthma, cancer, low birth weight, cardiovascular disease, etc. but also limits peoples' abilities to make use of ecosystem resources.

Statewide Plan Alignment for Equitable Recovery from Disasters

The Governor's Office of Planning and Research (OPR) leads long range planning and recovery project implementation for climate resilience and sets equitable recovery goals for state agencies. HCD's proposed 2023 Action Plan and proposed programs align with these goals outlined by OPR and presents programs that allow disaster impacted

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communities with different capacity levels to have access to disaster recovery and mitigation programs.

OPR prioritizes creating an equitable recovery, disaster resilience, and climate change mitigation. HCD's proposed programs will integrate these principles as disasters, disaster recovery, and mitigation from natural hazards continue to impact the State of California and its residents. HUD requires CDBG-DR grantees to focus on vulnerable populations in its recovery and mitigation activities, and HCD and its state partners further that commitment by defining, identifying, and prioritizing vulnerable populations in its recovery and mitigation programs. Social equity should be a key consideration as vulnerable populations and culturally sensitive groups may be most impacted by disasters.

In the context of climate adaptation, OPR and the Integrated Climate Adaptation and Resiliency Program (ICARP) define vulnerable communities as:

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

To further state identified goals and address climate vulnerability, HCD's proposed 2023 CDBG-DR and Mitigation program endeavor to align planning efforts at the state and local level, promote community resiliency to reduce climate risk, and develop planning documents that are used throughout government decision-making processes. For the proposed disaster recovery and mitigation programs, HCD will work to align program design to fit the following activities:

- Plan Alignment – align recovery and mitigation activities with existing state and local planning documents including:
- General Plans (Housing and Safety Element), State Hazard Mitigation Plan, Joint Hazard Mitigation Strategy, Local Hazard Mitigation Plan, Local Coastal Programs
- Encourage planning efforts beyond jurisdictional boundaries.
- Examples of implementation activities that advance the State's climate resilience/ mitigation and equitable recovery goals include:
- Using nature-based solutions to reduce community climate risk, protect watershed health and reduce infrastructure costs.
- Reduce risk of disaster impacts through the advancement of actions and mitigation strategies that increase community resiliency.
- Support needs and priorities of underserved communities through public engagement and coordination with community partners.

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- Advance equity by promoting short-term climate resilience activities or long-term development in LMI and vulnerable communities that are disproportionately impacted by disasters.
- Hardening structures to reduce climate hazard risk to homes and businesses.
- Coordinating incentives for strategic land assemblage to conserve natural/working lands, restore natural landscape functions, and/or transfer redevelopment to lower-risk locations.

3. General Requirements

a. Citizen Participation.

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

HCD recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through the many stakeholder meetings.

Outreach and Engagement.

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

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

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lost. Successful public participation is important because vulnerable population have historically faced barriers to engaged or receiving assistance from disaster recovery programs.

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

Stakeholder Consultation

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

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

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

- Print media, such as the newspaper (mandated for FRN)
- HCD's and other agencies social media
- State of California Governor's Office of Emergency Services (Cal OES), State of California Office of Planning and Research (OPR), Department of General Services (DGS)
- HCD Emails and meeting announcements to Government Agencies
- HCD Emails to Affordable Housing Developers in DR counties

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- HCD Emails and Meeting announcements to Voluntary Organizations and Non-Profits
- Announcements in interagency meetings
- Notices posted to HCD's CDBG-DR website in English and Spanish
- Direct mail and email to Tribal Government via HCD and Cal OES contact list
- Interagency consultation and coordination
- HCD's Long-term Recovery Meetings Organized by Cal OES and FEMA
- Recovery Support Function Meetings (RSF)
- Virtual targeted community meetings in disaster impacted areas
- Virtual meetings with stakeholders listed above
- Broad HCD Distribution List
 - CDBG-DR program contact list
 - Other State and Federal program contact list
 - HCD's and Cal OES Tribal Initiative
 - HPD contact list

In addition to the activities above, HCD has published this action plan on [HCD Website](#) for a 30-day public comment period. Citizens were notified through digital and non-digital means, in multiple languages, and with varying level of detailed information. These may include, but are not limited to:

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

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Primary Stakeholder Group

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

- Disaster Survivors
- Affected Disaster Recovery Cities and Counties (multiple meetings)
 - Housing and Community Development Staff
 - Infrastructure Public Works/Debris Removal
 - Planning and Permitting
 - Emergency Response Managers
- Tribal Government in disaster declared areas
- Government Partners (multiple meetings)
 - California Governor's Office of Emergency Services (Cal OES)
 - Governor's Office of Planning and Research (OPR)
 - California Department of Forestry and Fire Protection (CalFire)
 - Department of Insurance (CDI)
 - Department of General Services (DGS)
 - Department of Water Resources (DWR)
 - California Department of Transportation (Caltrans)
 - Federal Emergency Management Agency (FEMA)
 - United States Department of Agriculture (USDA)
 - Housing and Urban Development (HUD)
- Public Housing Authorities (PHAs) and Continuum of Care (Coc's)
- Long-Term Housing Recovery Groups
- Disaster Case Managers
- Organizations that represent protected classes and vulnerable populations

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

Secondary Stakeholder Advisors

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

- Affordable Housing Developers in the disaster impacted counties
- Statewide organizations such as Housing California or California Housing Partnership Corporation

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- Organizations that work primary in rural communities, such as, Rural Community Assistance Corporation (RCAC)
- State and Local Hazard Mitigation Planners, Funders, and Implementers
- Legislative Offices and Policy makers
- Regional Planning Entities
- Universities and Research Groups

HCD Conducted the following consultations during the 2023 CDBG-DR Pre-Federal Register (FRN) Notice Meetings.

Prior to release of FRN, HCD met with all the FEMA DR-4683 IA counties to explain the CDBG-DR processes and Action Plan requirements. This was critical since we are dealing with several overlapping disasters. CDBG-DR requires tie-back to use of funds, there is it is critical for stakeholders and jurisdictions understand the program and its requirements.

- Long-Term Recovery Group and Other State and Federal Agencies - 9/11/23 and 9/15/23
- Impacted Local Government - 9/15/23 through 10/30/23
- Disaster Case Managers and Local Charities - 11/6/23

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

A summary of citizen comments on this action plan, along with HCD's responses, is in Appendix c of this document. For more information, citizens can refer to HCD's citizen participation plan that can be found at [HCD Website](#).

See attachment A for details on the 2023 CDBG-DR Outreach Plan.

Public hearings.

Types of Stakeholder Meetings

There will be multiple meetings for specific target groups and topics starting in September of 2023 and ending with final public comment meeting. HCD will advertise these public meetings 15-30 days prior in English and Spanish to all the stakeholders identified above according to HUD and HCD standards. A contact person's name will be included for reasonable accommodation, translation services, and or any other questions. Registration instructions for the meetings will be included in the announcements.

All notices of publications will run on February 28, 2024, in English and Spanish through HCD email blast, social media, and following publications: The Sacramento Daily Recorder, SF Daily Journal, LA Daily Journal and posted on HCD's website. It will include an announcement of both the public comment period of 30 days (beginning

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February 28, 2024, and ending March 28, 2024) and the public meeting webinars held on March 20th at 6pm PST, in English, and March 21st at 6pm PST, in Spanish. HCD will also hold three local public comment meetings during the public comment period.

The PDFs of these presentations can be found on HCD's 2023 Disaster Recovery website: [Disaster Recovery & Mitigation | California Department of Housing and Community Development](#). All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allowed for questions and answer in real time between public meeting participants and HCD staff (in both English and Spanish). All questions and answers received during the public comment period, either through the public meetings or through written comments to HCD staff are addressed in writing in this Action Plan.

Pre-Federal Register (FRN) Notice Meetings

Prior to release of FRN, HCD met with all the Individual Assistance counties identified in FEMA DR-4683 to explain the CDBG-DR processes and Action Plan requirements. This was critical since we are dealing with several overlapping disasters. CDBG-DR requires tie-back to use of funds, there is it is critical for stakeholders and jurisdictions understand the program and its requirements.

Action Plan Development Meetings

HCD held meetings with state agency partners and local governments about the specific 2023 CDBG-DR allocation requirements, processes, and updated timelines. These meetings will focus on the development of Action Plan document and preparation for public release and before the start of public comment period.

Public Comment Period Meeting

HCD will hold two public hearings with CDBG-DR grantees and Disaster Survivors in English and Spanish after it has published on its website to solicit public comment and before submittal of the action plan to HUD. HCD will provide a period of 30 calendar days for comments on the Action Plan. Directions for submitting comments will be included in the public hearing notice. Comments can be submitted to the Department via mail, email, or by telephone through the contact information provided on webpages on the Department's website, or by reaching out to the contact information provided in the public notice.

The HCD disaster recovery team will develop FAQ (Frequently Asked Questions) for the HCD website after the first public meeting and update throughout the planning process. The presentation materials will be shared with all attendees and meeting recordings will be posted on the HCD website. All public comment questions will be answered in a timely manner and added to the Action Plan and posted to the HCD website.

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Limited English Proficiency

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

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

Complaints.

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

b. Public Website.

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

These items are made available through [HCD's CDBG-DR Action Plan for 2023 Disasters](#). Specifically, HCD will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g.,

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phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

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

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

c. Amendments.

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

Substantial Amendment.

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

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

When California pursues the substantial amendment process, the amendment will be posted here at [HCD's Website](#) for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. California will review and respond to all public comments received and submit to HUD for approval.

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

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

- Eligibility criteria for assistance. This includes description of all exceptions that may be provide on case-by-case basis.
- Associated national objectives for each program.
- Description of the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the disaster recovery programs.

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- Projected uses for the CDBG-DR funds, by responsible entity, activity, and geographic area.
- Identify all allocation criteria involved in method of distribution to local governments or Indian tribes. The criteria must be identified in the action plan or substantial amendment and approved by HUD before distributing the funds to a local government or Indian tribe.
- Identify all criteria, and the relative importance of each criterion, and any eligibility requirements, used to select applications for funding. This is applicable to applications solicited for programs carried out directly.

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

Non-Substantial Amendment.

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

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

d. Displacement of Persons and Other Entities.

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, HCD will coordinate with Governor's Office of Emergency Services (Cal OES) and other State Agencies to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

HCD develops all programs with the intent to minimize displacement of persons or entities, following its existing Residential Anti-displacement and Relocation Assistance Plan (RARAP) in accordance with 24 CFR part 42.325. All program policies and procedures, applications, and technical assistance provided will include policies around displacement. HCD will amend the existing RARAP to reflect the requirements and applicable waivers and requirements as modified by the Consolidated Notice, 87 FR 6381, prior to implementing any activity with 2023 CDBG-DR grants funds.

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

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

HCD understands the individualized nature of disaster recovery and the complexities of the recovery process, as well as the necessity to join in that process to provide support and guidance through that process.

e. Protection of People and Property.

The State of California has a long history of promoting building design and zoning to protect people and property from harm due to natural disaster.

California Department of Water Resources (DWR) Statewide Flood Management Planning (SFMP) program works with organizations across the State to develop flood management policies and guide financial investments to protect people and property from flooding.

In partnership with the U.S. Army Corps of Engineers, DWR developed California's Flood Future: [Recommendations for Managing the State's Flood Risk](#), a comprehensive look at flooding throughout the state.

Elevation standards.

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three feet above the 100-year floodplain.

Costs of elevation will be included as part of the overall cost of rehabilitation of a property. Many homes in the impacted areas with substantial damage need updates to meet current federal, state and local code requirements when repaired. If a home is within a 100-year floodplain, a cost estimate will be completed and compared with local and national averages comparable to the home's size, number of feet required for elevation and the geography of the location. Any building that has a total cost of repairs greater than 50 percent of the pre-disaster value of the property is considered

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substantially damaged and will require the entire home to be brought into code compliance.

Flood Insurance Requirements.

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). HCD may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. HCD is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120 percent AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.
- To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:
 - The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
 - The household earns less than 120 percent AMI or the national median and has unmet recovery needs.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% AMI or the national median and has unmet recovery needs.

Construction Standards.

HCD will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

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- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

HCD will use *housing construction codes of the State of California* for the proposed programs or activities.

For rehabilitation of non-substantially damaged residential buildings, HCD will follow the guidelines to the extent applicable as specified in the [HUD CPD Green Building Retrofit Checklist](#). When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, HCD will encourage, to the extent practicable, implementation of housing construction codes of the State of California.

Contractors Standards.

Contractors selected under HCD will make every effort to provide opportunities to low and very-low income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. *Grantees may elaborate on specific steps to promote Section 3.* HCD will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Policy and procedures for the Manufactured Home Replacement and Elevation Program will include a description of the standards to be established for construction contractors performing work in the jurisdiction and the mechanisms that HCD will use to assist beneficiaries in responding to contractor fraud, poor quality work and associated issues as well as details on the warranty period post construction. The Manufactured Home Replacement and Elevation Program policy and procedures will also address the program's mechanism for homeowners to appeal rehabilitation, replacement, and elevation work.

The Program will follow the program's policy and procedures to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.

Preparedness, Mitigation and Resilience.

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

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To integrate hazard mitigation and resilience planning with recovery efforts HCD will promote sound, sustainable, long-term recovery planning informed by post-disaster evaluation of hazard risk, including climate-related hazards, and the creation of resilience performance metrics.

This Action Plan includes a mitigation needs assessment that reviews the hazards and risks to the 2023 impacted communities and a demographic analysis examining the vulnerable populations within the impacted area. HCD is not currently proposing to use the 2023 allocation to fund a resilience planning program, since several other state agencies (including OPR, CalOES, DWR, and CalFire) all provide such planning grants. HCD is proposing to use its CDBG-DR Mitigation set-aside to enhance housing stock for seasonal farmworkers and for community resiliency centers to house underserved or LMI populations in future disaster response and sheltering needs. This Action Plan provides information on California State Plans and funding sources for resilience planning in the Mitigation Needs Assessment section (2.d. Mitigation Only Activities).

HUD defines resilience for CDBG-DR grantees as a “community’s ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks”^[80] HCD’s construction related programs include construction standards that will incorporate resilience and hazard mitigation measures into CDBG-DR funded activities.

In response to 88 FR 82982 this Action Plan must align with existing FEMA or other state, local, or tribal hazard mitigation plans. In addition, mitigation measures must be incorporated when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds.

Broadband Infrastructure in Housing.

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

Cost-Effectiveness.

^[80] “Climate Resilience and Disaster Recovery at HUD” (Disaster Recovery & Special Issues Division - Office of Community Planning & Development, n.d.), https://www.hud.gov/sites/dfiles/CPD/documents/Climate_Action_Equity_and_Recovery_Slides.pdf.

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The Manufactured Home Replacement and Elevation Program

The primary objective of the Manufactured Home Replacement and Elevation Program is the provision of decent, safe, and sanitary housing in the areas impacted by the DR-4568 disaster. Additionally, the program is designed to ensure that the housing needs of very-low, low-, and moderate-income households and vulnerable populations, including individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

The program will provide rehabilitation or replacement assistance to eligible applicants based on the extent of damage to their primary residences. The maximum amount of assistance available for rehabilitation and replacement of MHU is \$350,000 per damaged structure after applying any duplication of benefits reductions.

Demonstrable Hardship

HUD requires HCD to define “demonstrable hardship” and any related exceptions to program policies for applicants who demonstrate undue hardship. A demonstrable hardship is defined as a substantial change in a household’s situation that prohibits or severely affects their ability to provide and maintain a minimal standard of living or basic necessities, such as food, housing, clothing and transportation, causing economic distress well beyond mere inconvenience. A demonstrable hardship must occur after the floods and must be documented with objective evidence.

The demonstrable hardship must be of a severe, involuntary and unexpected nature, and not generally for the same reasons shared with other households affected by the disaster. Examples of demonstrable hardship may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. However, there is no one event that automatically defines a demonstrable hardship. HCD will consider each applicant’s overall situation if a demonstrable hardship is claimed, and documentation can be provided showing the cause and other factors relevant to the issue of demonstrable hardship.

Disaster Recovery Multifamily Housing Accelerator Program

The DR-ACCEL per-unit maximum loan assistance is consistent with the Basic Statutory Mortgage Limits, Section 234, adjusted for high-cost areas as published by the Federal Housing Administration (FHA). As a state-wide program with a variety of housing markets and corresponding costs, HCD uses the FHA limits as a federally established industry standard and safe harbor for cost reasonableness on a per-unit basis for housing serving low-income households. Consistent with other HUD affordable housing funding sources, these per-unit loan limits ensure an appropriate level of federal investment in Multifamily projects on a per-unit basis. This policy direction

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encourages leveraging with HOME, Tax Credits, State MHP, and other available affordable housing resources.

MULTIFAMILY HOUSING PROGRAM MAXIMUM PER-UNIT LOAN LIMIT (2022)

Bedrooms	Maximum Subsidy
0	\$179,723
1	\$206,024
2	\$250,530
3	\$324,105
4	\$355,766

For MHP loan limit calculations, the unit count may include the number of Restricted Units within the project, including units with long-term, low-income or occupancy restrictions imposed by HCD, Tax Credit Allocation Committee (TCAC), or other public agencies and restricted at no greater than 65 percent of AMI. Awards of CDBG-DR funds shall not exceed the lesser of the demonstrated need or the MHP Maximum Per-Unit Loan Limit calculation.

Duplication of Benefits.

A duplication of benefits occurs when an impacted person, household, business, government, or other entity receives financial assistance from multiple sources such as FEMA, USACE, EDA, insurance, etc. for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. A duplication of benefits (DOB) review will be applied to all CDBG-DR activities. In determining an applicant's unmet need, subrecipients must follow HCD's DOB policy. The process for determining any duplicates includes assessing the need, identifying the total assistance available to the applicant deducting benefits received for a different purpose, deducting funds received for the same purpose but different eligible use, and funds not available. Once the duplicated funds have been identified and subtracted from the unmet need amount, any remaining unmet need can be assisted with the CDBG-DR funds.

All agreements between HCD and beneficiaries, and HCD and subrecipients require all sources of possible duplicative assistance to be disclosed to HCD. Additionally, a subrogation clause contained in these agreements requires any person who receives further assistance to repay that assistance, if the amount of assistance exceeds the funding required for the project.

4. Grantee Proposed Use of Funds

Overview.

HCD is the lead agency and responsible entity for administering \$115,022,000 in CDBG-DR funds allocated for disaster recovery.

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These programs include two housing recovery programs to address the unmet recovery need in the HUD MID areas: the 2023 Manufactured Home Replacement and Elevation Program, and a Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL). The Migrant Resiliency Center Program provides for CDBG-DR Mitigation funds to assist mitigation projects in MID.

a. Program Budget

Program Category	Program	Budget	HUD Identified MID Budget	Grantee Identified MID Budget	% of Allocation	Maximum Award	National Objective	Program Category
Housing	Rehab	\$35,250,000	\$35,250,000	\$0	30.65%	\$350,000	LMI	Housing
	Buyout	\$0	\$0	\$0	0%	\$0	Not applicable	
	New Construction	\$59,017,900	\$59,017,900	\$0	51.31%	\$0	LMI	
	Other			\$0		\$0	Not applicable	
Economic Revitalization	Workforce Training	\$0	\$0	\$0	0%	\$0	Not applicable	
	Business Grants	\$0	\$0	\$0	0%	\$0	Not applicable	
	Other	\$0	\$0	\$0	0%	\$0	Not applicable	
Infrastructure	Water/sewer Improvements	\$0	\$0	\$0	0%	\$0	Not applicable	
	Health Facilities	\$0	\$0	\$0	0%	\$0	Not applicable	
	Other			\$0		\$0		
Public Services	Legal Services	\$0	\$0	\$0	0%	\$0	Not applicable	
	Housing Counseling	\$0	\$0	\$0	0%	\$0	Not applicable	
	Other	\$0	\$0	\$0	0%	\$0	Not applicable	
Mitigation	Mitigation	\$15,003,000	\$15,003,000	\$0	13.04%	\$0	LMI	Mitigation
Admin	Admin	\$5,751,100	\$5,751,100	\$0	5%	\$0	Not applicable	Admin
Planning	Planning	\$0	\$0	\$0	0%	\$0	Not applicable	
Total		\$115,022,000	\$0	100%				Total

Data Source: 2023 Unmet Needs Analysis

Connection to Unmet Needs.

The allocations for each recovery program are based on the unmet needs analysis, which identified housing as a serious unmet recovery need. The FEMA IA declared counties for DR-4683 and the HUD defined MID areas were determined to be of most need based on FEMA determined areas of concentrated damage. The damage emphasized for DR-4683 were on manufactured homes and the vulnerable populations living within these homes and the general impacted areas. Furthermore, the unmet need was created on limited data (verified property level information) in the defined impacted areas as detailed in the alternate methodology.

As required by the FRN 88 FR 82983, HCD will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a DR-4683 presidential major disaster declaration. However, due to

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the limited disaster recovery funds available and the amount of unmet need remaining in the MID areas, this Action Plan directs 100 percent of the funds to address unmet needs with the HUD-identified MID areas.

This action plan primarily considers and addresses the unmet need in the MID identified counties. Programs are developed to address the most severe unmet needs of most vulnerable populations and in full compliance with the Federal Register Notice. The level of unmet recovery need identified in 2023 MID counties, far exceeds the amount available through the current 2023 funding allocation. With limited funds available, HCD must prioritize its limited funding on areas that providing a significant direct impact for those entities in the HUD MID, and a significant indirect impact to the beneficiaries served by these jurisdictions.

Given the small allocation size for DR-4683, limited set of potential projects with need, none of which benefited LMI communities, and availabilities of other state and federal infrastructure funds, HCD is not allocating any funds for infrastructure activities in the 2023 MID.

As previously detailed in our alternative methodology the CDBG-DR funded programs will also consider eligible CDBG activities, will be responsive to CDBG national objectives. Both housing programs and the proposed mitigation program will comply with all regulatory guidance issued to HCD, and considers best practices established through similar recovery initiatives.

The primary recovery needs include owner occupied housing replacement and elevation for housing (Manufactured Home Replacement and Elevation and Disaster Recovery Multifamily Housing Accelerator Program). In accordance with the Federal Register Notice directive to first address the unmet housing recovery need, this Action Plan also addresses the housing need, including a portion of CDBG-DR funding of critical infrastructure for the proposed Migrant Resiliency Center Program. Therefore, any housing and mitigation projects funded with this allocation of CDBG-DR will have a documented contribution to the long-term recovery and restoration of housing.

Leveraging Funds.

Over the last three decades, HCD has provided more than \$3 billion in funding for the development of affordable housing and associated infrastructure. HCD manages non-entitlement programs, providing leadership and policies to preserve and expand safe and affordable housing opportunities and promote strong communities for all Californians. By administering programs that provide grants and loans from both state and federal housing programs, HCD can leverage existing programs to increase the impact of CDBG-Dr funding.

To maximize the impact of the CDBG-DR funding provided to the state, there will be an ongoing commitment to identify and leverage other federal and non-federal funding sources. HCD will also utilize existing relationships and strive to create new

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partnerships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of leveraging all viable sources of funding.

CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources, including FEMA and SBA. Existing state resources and other funds from the disaster appropriation will also be examined to ensure that all available funding is used where it is most needed.

Furthermore, the state has designed all housing programs in this Action Plan to cover the gap in funding remaining after insurance, and other assistance has been applied to each project. Understanding the limited funding for recovery, the state will encourage all program applicants to seek out other funding sources to meet their full recovery needs.

The state has authorized many housing programs that may complement the recovery effort. These programs are either competitive or are issued based on a formula allocation; no loans or grants are made directly to individual households. Cities, counties, qualified CHDOs, affordable housing corporations, and other qualified applicants may apply to build more affordable housing in their community to speed recovery.

Program Partners.

Not applicable to program design.

Distribution of Funds.

HCD will distribute funds to beneficiaries using one of two methods: 1) HCD administered programs and 2) local government (known as “subrecipients”) administered projects.

Eligible Geographic Location - 2023 HUD MID Areas

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HCD will spend 100 percent of the 2023 DR Allocation, to include the mitigation set-aside, in the HUD MID areas.

The following counties make up the MID areas for DR-4568: Merced, Santa Cruz, San Luis Obispo, San Joaquin, and Ventura. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

Criteria to determine the method of distribution

Funds are distributed among proposed programs using an objective methodology targeted towards the Most Impacted and Distressed counties identified earlier in this document. Distribution methods are designed to consider the unique context and needs

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of affected populations as well as the administrative capacity of jurisdictions that will manage the local recovery process. This methodology ensures that CDBG-DR funds will be used to maximum benefit to address unmet housing recovery, and mitigation needs.

As required by the Federal Register Notice, HCD conducted an assessment of its internal capacity during program planning and design. The capacity assessment concluded that, with organizational and staffing adjustments at HCD, the Department can successfully launch and directly manage housing recovery accelerator program.

HCD also assessed the capacity of local governments to administer CDBG-DR funded programs during recovery planning and coordination discussions. This assessment included evaluations of localities' familiarity with key federal grant administration requirements, experience managing programs similar to those proposed in this Action Plan, and ability to add necessary capacity and subject matter expertise through hiring or procurement.

Through the conversations and working sessions with local officials, HCD gained a clear understanding of local strengths and how best to leverage the capacity and expertise at the local level. These assessments concluded that local governments are best positioned to operate and manage project specific funding related to MHU replacement and elevation as well as the mitigation program.

The level of unmet recovery need identified in both eligible 2023 counties, as well as the MID counties far exceeds the amount available through the current 2023 funding allocation. With limited funds available, HCD must prioritize its limited funding on areas that will make the most impact for low and moderate income, federally protected classes, and vulnerable populations. In an effort to maximize its impact, HCD proposes to use the 2023 funds to focus on unmet housing needs.

As discussed in the Unmet Needs section, there are unmet recovery needs across all eligible activities. The needs assessment influenced the development and prioritization of recovery activities outlined in the Action Plan. HCD consulted with affected citizens, stakeholders, local governments, social services providers, public health agencies, flood plain management agencies, and public housing authorities within the most impacted and distressed areas (HUD MID) to assess needs. The full list of consultations is available in the Appendix (A).

HCD consulted with the Cities and Counties impacted by the 2023 disasters, details of these consultations can be found in the Appendix A. With limited CDBG-DR resources available, HCD is committed to utilizing the state resources available to them to meet the needs of unhoused populations in the impacted area. HCD conducted data analysis on federally protected classes within the 2023 disaster impacted area and consulted with service providers and local governments that work with vulnerable populations.

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The proposed CDBG-DR programs encourage applicants to prioritize vulnerable populations through tiering the Manufactured Home Replacement and Elevation Program and through project selection (multifamily program). In addition, HCD proposes to leverage other state funding available to support the needs of vulnerable populations in the impacted area. Following the guidance in the federal register notice, along with California's existing affordable housing crisis, the State will focus its 2023 CDBG-DR resources primarily on housing program in MID areas.

Disaster Recovery Multifamily Housing Accelerator Program

For the Multifamily Housing Accelerator Program, HCD will use housing accelerator style program that enables shovel-ready affordable housing projects that, despite having received one or more awards from other HCD programs, are unable to move forward due to funding gaps that resulted from their inability to access tax-exempt bond allocations or low-income housing tax credits.

HCD is aware that disasters disproportionately affect LMI households, and that this disparate impact, combined with pre-disaster vulnerabilities, make the recovery process especially challenging for vulnerable populations and underserved communities. LMI households are also more likely to be displaced during and after a disaster due to limited resources and a diminished stock of affordable, available, and safe housing.

Manufactured Home Replacement and Elevation Program

HCD will provide funding to subrecipients based on disaster impacts in the MID counties on manufactured housing units and unmet needs to that jurisdiction. The sum of this allocation of funds disbursed for each subrecipient's jurisdiction divided by the total damage data is the proportionate share of funding. This allocation also ensures that nearly 100 percent of MHU recovery funds are spent in MID areas. Based on the information gathered from DCMP's and local governments, the priority population for the program will be the LMI owners of MHU that have been severely damaged or are not suitable for rehabilitation. The general demographic for older MHU units, are LMI households as well as seniors. This program will prioritize MHU owners with largest need.

Protected Classes

In addition, HCD also considered the impacts to protected classes as part of the program design and method of distribution. For each program, an analysis of the data and potential impacts was conducted and incorporated into the design. HCD has described the potential impacts and barriers that each protected class may encounter as a result of the program proposed, and mitigating steps taken through program design and implementation. Furthermore, HCD understands the ever changing world of disaster recovery and mitigation programs and is committed to revisiting and analyzing these impacts throughout the life of each program.

Race/Ethnicity

Manufactured Housing Replacement and Elevation Program

Historic redlining and discriminatory lending practices have historically disadvantaged Black, Indigenous, and People of Color (BIPOC) across the United States and the State of California. Property values in redlined and vulnerable communities result in lower housing values that may impact the benefit limitations, award caps, and thresholds of a housing recovery program. While barriers to homeownership remain and access to capital for home repair remains unequal, HCD's Manufactured Housing Replacement and Elevation Program prioritizes vulnerable populations and includes hands on case management to ensure that outreach is conducted to the most vulnerable populations with Limited English Proficiency recovering from the disaster.

The program subrecipient will follow HCD's affirmative marketing procedures for outreach to LMI population in the protected class groups least likely to apply to the Manufactured Home Replacement and Elevation Program. The program will require the subrecipients to proactively reach to the most vulnerable populations (persons over age 65 and persons with access and functional needs), including coordination with disaster case managers for outreach to LMI population in the protected class groups least likely to apply to the Manufactured Home Replacement and Elevation Program with limited English Proficiency.

Mitigation Program

Each year during the planting and harvesting season agricultural farm workers and their families migrate from their homes to work in California's fields and canneries. The Office of Migrant Service (OMS) centers have been used as emergency shelters during the off season, between November and March for DR-4683 and 4699, as well as prior federally declared disasters in 2018 and 2020. HCD's proposed 2023 Mitigation program will provide capital improvements for OMS centers to improve building standards and install infrastructure that can both provide enhanced opportunities to temporary shelter vulnerable populations in future disasters. Additionally, during non-disaster period, the OMS centers will also provide improved housing for seasonal farmworkers. Seasonal farmworkers have the least amount of resources to support their housing needs in California's housing crisis.

Households with Children

Manufactured Housing Replacement and Elevation Program

The housing crisis impacting the State of California limits the number of housing types available for residents, including families with children. The lack of appropriately sized homeownership opportunities may lead to overcrowding or unsafe conditions. From 2015 to 2020, the greatest number of fair housing complaints, as reported by DFEH and FHEO, were attributed to discrimination based upon disability, followed by

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discrimination based upon race, and then by discrimination based upon familial status. HCD's program is open and available for all household sizes.

Disaster Recovery Multifamily Accelerator Program

As with homeownership, households with children face a limited supply of affordable housing opportunities across the state of California. Disaster exacerbates this availability of different unit sizes and affordability, pushing impacted households, including families with children further from the disaster impacted areas. The MHP program allows for a variety of unit sizes and are projects are screened for their tie-back to the disaster, ensuring that rental housing is sited appropriately for renters. The MHP program also requires an AFHMP that ensures equal access to CDBG-DR funded properties.

Persons with Disabilities

Analysis of impacts from DR-4683 did not identify a disproportionate impact to persons with disabilities. That said HCD is committed to ensuring equitable access for persons with disabilities. HCD includes the following in its policies and procedures to ensure equal access for persons with disabilities:

"In accordance with Section 504 of the Rehabilitation Act of 1973 requirements, necessary accommodations are made to ensure that eligible elderly persons and persons with special needs can successfully participate in the Program. special accommodation by presentation of a mobility card, or presentation of proof of SSDI benefits." "Additional modifications to increase accessibility for applicants or household members of applicants who have access and functional needs is an allowable part of the repair, reconstruction, or relocation assistance provided by the Program. "

Persons over the age of 65

Many of the rural communities impacted by the 2023 disaster have a higher proportion of residents over the age of 65 compared to the state overall. Many residents over the age of 65 are on fixed incomes, or face barriers to rebuilding after a disaster. Due to the health and safety issues, many of the fatalities from flooding have included persons over the age of 65. Merced, San Joaquin, and Santa Cruz County had the highest number of MHU homeowners over the age of 65 impacted by the 2023 disaster. The HCD is coordinating with DCMP's to assist all applicants, including those over the age of 65 through the application process. The Subrecipients will be required to include case management team that will adapt to the needs of the population to ensure they have access to the program. This includes meeting in person with applicants, providing paper applications in different languages, and assisting applications throughout the rebuilding process.

Disaster Recovery Multifamily Accelerator Program

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HCD's multifamily Universal Scoring Criteria awards points to applications that include units serving Older Adults in Need of Supportive Services, which includes individuals who are age 55 or older and who need supportive services to maintain and stabilize their housing.

Population with Limited English Proficiency

MHU owners whose primary language is not English are provided vital Program documents (e.g., brochures and any relevant forms, applications, surveys, etc.) as well as other tools for guidance translated to their native language. By translating and providing Program documents into their native language, all homeowners are given reasonable opportunity to understand Program requirements. As a standard practice, Program documentation is translated into Spanish. Translation into other languages is completed upon request. The case management team has team members on staff who are able to directly manage households where English is not the primary language.

Disaster Recovery Multifamily Housing Accelerator Program

All developers are required to submit an AFHMP (Affirmative Fair Housing Marketing Plan) as part of their application and a program threshold. The AFHMP must include how the developer will complete outreach and marketing to ensure those with limited English proficiency have access to the affordable housing units. Each AFHMP is reviewed by HCD as part of the program application and NOFA process.

HCD Administered

HCD will directly operate the Multifamily Accelerator Program and follow HCD's Multifamily Program's guidelines.

Subrecipient Administered

HCD will engage with subrecipients to administer the Manufactured Housing Rehabilitation and Elevation as well as Mitigation Program. All projects will be vetted for CDBG-DR compliance and eligibility, ensuring that proposed projects adhere to federal requirements and the requirements set forth in the Action Plan and program policies and procedures. The implementation and management of individual projects will be the responsibility of participating subrecipients, while HCD will provide monitoring and broad oversight of subrecipient administered funds. More specific program details can be found in the Program Section of this Action Plan.

Reimbursement Payments to Subrecipients

HCD operates on a reimbursement basis for all CDBG-DR and MIT projects. All costs must be incurred and paid for by the subrecipient prior to HCD providing reimbursement from the U.S. Treasury. Subrecipients are expected to submit payment requests on a monthly basis according to the Standard Agreement and provide evidence that all invoices and costs incurred were paid and the work was inspected.

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Payments for eligible costs are processed when submitted to HCD as reimbursements for subrecipients for expenses incurred during the project. Mitigation staff then reconcile expenditures with FISCAL and Grants Network, the financial system and systems of record for the state and HCD. Processes for monitoring expenditures of subrecipients and payment processing are outlined in HCD's Grant Administration Manual (GAM). Under certain conditions, subrecipients may incur costs prior to the effective date of their grant agreement. The subrecipient may then pay those costs (including reimbursing itself if it used its own funds to pay the costs) after the effective date of the grant agreement. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with written approval of HCD.

If pre-award costs (also known as pre-agreement costs) are incurred for an eligible activity listed in this action plan, the payment for eligible costs must comply with the pre-award regulations at 24 CFR 570.200(h) and 570.489(b) and follow the guidance issued by HUD in the Community and Planning Development (CPD) notice 15-07. Full eligibility criteria will be provided in the program policies and procedures and will be made available during the project application phase.

Program Income.

HCD manages program income through the provisions in the Standard Agreement, which all subrecipients must sign to receive funding from HCD. Subrecipients report program income to HCD through a request for payment and must be expended by the subrecipient prior to additional grant funds being drawn. Program income may only be used for eligible project or administration costs related to the awarded project before additional grant dollars are expended. Subrecipients provide monthly reports to HCD on program income generated and retained. Program income remaining at the end of each quarter is remitted to the state. HCD reports, quarterly, all program income to HUD through the HUD Disaster Recovery Grant Reporting system (DRGR). If at the end of a Standard Agreement there is remaining program income, it is returned to HCD during closeout where the Division of Administration and Management Accounting office tracks the program income until it is obligated in a new Standard Agreement and track through the Standard Agreement system of record.

Resale or Recapture.

Manufactured Home Replacement and Elevation Program

Under the Manufactured Home Replacement and Elevation Program an applicant may be required to repay all, or a portion of the assistance received from the Program. The reasons for grant recapture may include the following reasons:

Providing false or misleading information to the MHRE

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Withdrawal from MHRE prior to completion of the project. Withdrawal from the program must be in writing or email and a new survey and application will be required if the applicant wishes to participate again.

Construction is not completed due to non-cooperation by owner(s).

Non-compliance with the approved SOW in a manner that would make the home ineligible (i.e., did not comply with lead paint abatement requirements).

Failure to report the receipt of additional insurance, SBA, FEMA, non-profit assistance and/or any other DOB received after award.

To address any potential future DOB, applicant beneficiaries must, as a requirement for participating in OOR, agree to enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, after an award is issued, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

Disaster Recovery Multifamily Housing Accelerator Program

New construction, rehabilitation, or reconstruction of rental projects with more than 5 units shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55-years.

DR-ACCEL policies and procedures provide that a Developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements of 55-years for the entire period specified in the agreement.

b. Program Details

Housing Program

2023 Manufactured Home Replacement and Elevation Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-06-0001	\$35,250,000	\$35,250,000	\$0.00

Narratives

- **Program Description**

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The primary objective of the Manufactured Home Replacement and Elevation (MHRE) Program is the provision of decent, safe, and sanitary housing in the areas impacted by the DR-4683 disaster. Additionally, the program is designed to ensure that the housing needs of very-low, low-, and moderate-income households and vulnerable populations, including individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

The program will provide assistance to eligible applicants based on the extent of damage to their Manufacture Housing Unit (MHU) primary residences. The maximum amount of assistance available for replacement and elevation of a unit is \$350,000 per damaged structure after applying any duplication of benefits reductions. This amount is intended to cover the cost of purchase, installation, and elevation of MHU at 2' to 3' above 100-year flood levels.

- **Program Tieback to Disaster/Unmet Needs**

HCD will spend 100 percent of the 2023 CDBG-DR allocation in the HUD MID areas. The MHU must have been damaged or destroyed as a result of the qualifying disaster and located in the MID counties.

The data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan. The data provided by the Disaster Case Management providers and local governments identified the greatest owner-occupied post disaster housing needs as those related to manufactured housing units in mobilehome parks impacted by DR-4683. The damage data demonstrated need across all five MID counties.

MANUFACTURED HOUSING UNITS IMPACTED IN MID COUNTIES DR-4683

2023 MID Counties	# of damaged MHU units	Total Need Impact	HCD MORE Program Available Funds	Total Unmet Needs	Percent of Unmet Needs
Santa Cruz	71	\$24,850,000	\$10,900,000	\$13,950,000	8%
Merced	176	\$61,600,000	\$27,250,000	\$34,350,000	19%
San Joaquin	236	\$82,600,000	\$36,787,500	\$45,812,500	25%
Ventura	94	\$32,900,000	\$14,987,500	\$17,912,500	10%
San Luis Obispo	328	\$114,800,000	\$46,325,000	\$68,475,000	38%
Totals	905	\$316,750,000	\$136,250,000	\$180,500,000	100%

Source(s): Local Jurisdiction; HCD OOR Program DR Grant Implementation 2017-2018 and HCD NOFA for Manufactured Housing Opportunity & Revitalization Program (MORE).

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While HCD recognizes that some single-family stick-built housing was impacted by DR-4683, information provided through FEMA and SBA data as well as DCMP and local governments did not indicate eligible households for CDBG-DR resources. Other funding sources, such as, HOME Program or the State funded CalHOME Program are a better match for the impacted stick-built population. Furthermore, HCD has partnered with state public agencies to monitor for any mold related health impacts in DR-4683 impacted counties. As of January 22, 2024, California Department of Public Health's Center for Preparedness and Response (CPR) and Environmental Health Epidemiology Investigations (EHEI) both report having no collected data indicating post flood outbreaks or clusters of health impacts related to mold exposure in DR-4683 counties. CDPH CPR checked their Regional Disaster Medical Health Specialists/Coordinators (RDMHS/C) reports for any post flood mold related health impacts occurring at the local level and found none.

- **How Program will Promote Housing for Vulnerable Populations**

Applicants eligible for the Manufactured Home Replacement and Elevation Program funding must be LMI and the unit must be primary residence located in the MID counties. Residences must have experienced FEMA defined minor or major damage in the qualifying disaster. The 2023 flood damages had different levels of water damage inside the impacted units. A minor damage poses health and safety risk to disaster survivors and their housing needs especially for MHU. Information provided by DCMP, and local governments identified senior household impacted by flooding in mobilehome parks that had unmet needs.

Since, MHUs represent a significant portion of the non-deed restricted affordable housing stock in DR-4683 MID counties. This program will fill the gap for the vulnerable population of MHU owners and provide sustainable and resilient housing options. Program will also pay for enhanced elevation of 2 or 3 feet above 100-year flood levels to ensure long-term sustainability and resiliency. If the rehabilitation cost exceeds the purchasing a new MHU, this program will replace the unit and provide for anchoring and elevation when appropriate. New MHU are built to higher standards and will provide safe and affordable housing for longer period of time.

Affirmative Marketing

The program subrecipient will follow HCD's affirmative marketing procedures for outreach to LMI population in the protected class groups least likely to apply to the Manufactured Home Replacement and Elevation Program. The program will require the subrecipients to proactively reach the most vulnerable populations (persons over age 65 and persons with access and functional needs), including coordination with disaster case managers and persons with limited English Proficiency.

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Affirmative marketing plans shall include specific and meaningful targeted outreach efforts to reach those populations identified as least likely to apply for the housing opportunity. For more information on federal and state protected classes, see HCD's 2020 Analysis of Impediments to Fair Housing:
<https://www.HCD.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>

Mobilehome Residency Law Protection Program

HCD's Division of Codes and Standards is responsible for implementing a variety of regulatory and administrative tasks related to MHUs in California. These include tasks such as titling and registration for each MHU in California as well as mobile home residency and renter protection programs. The Mobilehome Residency Law Protection Act of 2018 Assembly Bill 3066 (Chapter 774, Statutes of 2018) authorized HCD to implement programs to help resolve some of these disputes that can arise between mobilehome/manufactured homeowners and park management. The Mobilehome Assistance Center (MAC) receives and processes complaints from the public and from public officials related to living conditions in manufactured homes and mobilehomes. Staff provides information, coordination, referrals, and other assistance to help resolve complaints generally related to:

- The operation of mobilehome parks related to health and safety matters.
- The purchase, sale, financing, titling, and registration of manufactured homes and mobilehomes.
- The installation, inspection, and maintenance or alteration of manufactured homes, mobilehome accessory structures, and park grounds.

Subrecipients will inform program applicants about services available through MAC through distribution of outreach materials.

- **Program Affordability Period**

There is no affordability period for MHRE Program projects.

- **Program Definition of Second Home/Eligibility**

Assistance for second homes is not an eligible activity.

- **Program National Objective**

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR funded activities must satisfy a national objective. All replacement activities will meet either the urgent need or LMI housing national objective criteria related to disaster recovery.

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As stated in the Needs Assessment, the location of the disasters presents unique challenges for addressing housing impacts. The disasters impacted households of all incomes and landscapes, including suburban neighborhoods and rural communities. While there are regional differences in the housing markets, all of the impacted areas struggle to provide an adequate supply of affordable homes to area residents. The dollar amount directed towards the Manufactured Home Replacement and Elevation Program reflects the type of tenure of housing losses in the qualifying disaster. This program aims for 100 percent of funds to be used towards the LMI national objective by requiring beneficiaries to be LMI households.

- **Program Eligibility**

Owner-Occupants

Applicants who are owner-occupants will be eligible to participate in the MHRE Program if they meet the following criteria:

- Must have owned the MHU at the time of the qualifying disaster.
- Must have occupied the MHU as their primary residence at the time of the qualifying disaster.
- The MHU must have experienced minor or major damage or been destroyed as a result of the qualifying disaster and located in the MID.
- Must be LMI, as defined by the CDBG Program.
- Must be current on property taxes or have been correctly permitted and permissible for the zoning area or local development standard.
- The damaged property must be a mobile home or manufactured housing unit (i.e., not a stick-built single-family home, condominium, duplex, fourplex, or other multi-owner property).

Subrecipients will assess applicant eligibility on a case-by-case basis according to the eligibility criteria fully defined in the program policy and procedures.

- **Program Responsible Entity**

The Manufactured Home Replacement and Elevation Program is delivered at the local level under the guidance of HCD's housing subject matter experts and contract managers.

HCD will monitor subrecipients to ensure that appropriate marketing and outreach, environmental reviews, award closings, monitoring, and closeout are conducted on a per-project basis. HCD will also monitor to ensure that the specific requirements of duplication of benefits to the project are also considered.

- **Program Maximum Assistance**

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The maximum amount of assistance available for the Manufactured Home Replacement and Elevation Program is \$350,000 per damaged structure after applying any duplication of benefits reductions.

Demonstrable Hardship

HUD requires HCD to define “demonstrable hardship” and any related exceptions to program policies for applicants who demonstrate undue hardship. A demonstrable hardship is defined as a substantial change in a household’s situation that prohibits or severely affects their ability to provide and maintain a minimal standard of living or basic necessities, such as food, housing, clothing and transportation, causing economic distress well beyond mere inconvenience. A demonstrable hardship must occur after the flood and must be documented with objective evidence.

The demonstrable hardship must be of a severe, involuntary and unexpected nature, and not generally for the same reasons shared with other households affected by the disaster. Examples of demonstrable hardship may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. However, there is no one event that automatically defines a demonstrable hardship.

Subrecipients will consider each applicant’s overall situation if a demonstrable hardship is claimed, and documentation can be provided showing the cause and other factors relevant to the issue of demonstrable hardship.

- **Program Estimated Begin and End Dates**

The Manufactured Home Replacement and Elevation Program is expected to commence following HUD’s approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

- **Other Program Details**

HCD will provide technical assistance to subrecipients including program policies and procedures that will outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating applications and approving MHU replacement and elevation projects.

Priority Population

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Based on the information gathered from DCMP’s and local governments, the priority population for the program will be the owners of MHU that have minor or major damage from DR-4683.

Program Competitive Application Overview

Not Applicable.

- **Program Method of Distribution Description/Overview**

HCD will distribute grant funds to beneficiaries through local governments (known as “subrecipients”) to administer the Program.

Subrecipient-Administered Allocation Amount is shown below based on Manufactured Housing Impacts from 2023 disasters, DR-4683 in the MID Counties. This data set was provided by DCMP and local governments.

Allocation Methodology

Funding is available to subrecipients based on a formula to determine a proportionate share of the total program allocation based on the disaster impacts to that jurisdiction. HCD used a methodology to calculate the allocations based on the manufactured housing impacts from the MID counties. The sum of this allocation of funds disbursed for each subrecipient’s jurisdiction divided by the total damage data is the proportionate share of funding. This allocation also ensures that nearly 100 percent of MHU recovery funds are spent in MID areas.

2023 Mid Counties	# of Damaged MHU Units	Percent of Total Damaged MHU Units	Local Allocation
Santa Cruz	71	8%	\$2,531,030
Merced	176	20%	\$6,274,102
San Joaquin	236	27%	\$8,413,000
Ventura	94	11%	\$3,350,941
San Luis Obispo	328	35%	\$10,979,678
Total	905	100%	\$31,548,750

Delivery

The Manufactured Home Replacement and Elevation Program will be administered and monitored by HCD. However, HCD will enter into a subrecipient agreement with local governments to manage the CDBG-DR funds and the Program.

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HCD will leverage internal resources, bring on staff to increase capacity and expertise, and procure a consultant to provide technical assistance, maintaining the responsibility of overseeing the program and compliance of individual projects. Local jurisdictions will be responsible for outreach, implementation, and oversight of approved projects, with regular monitoring by the state.

• **How Mitigation Set-Aside Activities Will Meet Definition of Mitigation?**

The Federal Flood Risk Management Standard (FFRMS) applies to Federal investments. Structures that experience a loss, would be required to build to newer elevation standards (both FFRMS and TMAC requirements) when rebuilding. In general, the higher a structure is above the Base Flood Elevation (BFE) – 100-yr floodplain – the less likely the structure is to have a loss.

Parallel to these FEMA driven approaches, the American Society of Engineers (ASCE) will be updating building code best practices, including incorporating requirements for different types of structures to be elevated to at least 1" above the BFE, and possibly incorporation of 2" or 3" elevation requirements to align with FEMA's proposal for the FFRMS.

Therefore, HCD is requiring that replacement of MHU be 2" or 3" above base flood elevation and include proper anchoring of MHU. These two factors will mitigate impacts from future floods and help protect investment made by this grant.

• **How Mitigation Set-Aside Activities will Address Current & Future Risks?**

Impacts from DR-4683 were due to floods, this program not only replaces but elevates and anchors MHU's to mitigate against future flood impacts.

Projection of Expenditures and Outcomes

See Appendix B for HCD's 2023 Projections and Outcomes for MHU and MHP Programs

Disaster Recovery Multifamily Housing Accelerator Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-06-0001	\$59,017,900	\$59,017,900	\$0.00

Narratives

- **Program Description**

The Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL) is designed to meet the unmet rental housing needs of LMI populations, including the needs of individuals displaced from rental mobile homes, single-family and multifamily rental units, as well as individuals made homeless as a result of the disaster. Multifamily projects include apartment complexes and mixed-use developments. The objective of the CDBG-DR funds is to provide necessary gap financing for the development of rental housing units in the HUD MID areas from DR-4683.

The DR-ACCEL Program is proposed to close gaps for MF projects that have received an award from at least one HCD funding source from a multifamily housing loan program NOFA prior to 2024. Projects that have secured such funding must have included and received approvals for affirmative marketing and outreach plans in accordance with HCD's funding program procedures and requirements, including efforts to reach those least likely to apply, and persons with limited English proficiency. In addition, applicants must have also demonstrated that proposed projects will affirmatively further fair housing as condition of state MF awards.

HCD multifamily housing funding program require developers to demonstrate that proposed projects will affirmatively further fair housing, and are likely to lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, nonminority areas in response to natural hazard related impacts.

Projects must commit to an affordability period of 55-years. If other funds requiring a longer affordability period are committed to the project, the longest affordability period will prevail for the project.

- **Program Tieback to Disaster/Unmet Needs**

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HCD will spend 100 percent of the 2023 DR Allocation, including the mitigation set-aside, in the HUD MID areas for DR-4683. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan. LMI renters receive the least amount of resources after disasters yet face the largest need for housing. The housing programs were allocated based on data from DCMPs. Based on data provided by DCMPs, the largest group of LMI populations impacted by DR-4683 are renters, who plan on continuing renting.

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The following counties make up the MID areas for DR-4683: Merced, Santa Cruz, San Joaquin, San Luis Obispo, and Ventura. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

One of the prioritization criteria is distance to DR-4683 flooded areas. Project closest to DR-4683 and not in 100-year flood plain areas will receive more points for this program.

- **How Program will Promote Housing for Vulnerable Populations**

- Affirmative Marketing and Fair Housing*

- The DR-ACCEL Program applications must have secured funding from at least one other HCD source. All HCD funding sources include requirements for affirmative marketing plans as well as commitment to fair housing and outreach to protected classes.

- Prioritization Criteria*

- This program is intended to be an accelerator type program and close gaps for MF projects that have secured at least one HCD funding source from a multifamily housing loan program NOFA prior to 2024 and yet face gaps limiting ability to initiate construction. Projects that meet this criterion will be prioritized based on number of affordable units, fund leveraging, distance from the flood, and readiness. The tiebreaker is based on affordability levels and targeting homeless or at-risk of homelessness.

- HCD will develop an application to gather required information. At the close of the application period, projects receiving the highest points will initiate negotiations to execute subrecipient or development agreements.

- **Program Affordability Period**

- New construction, rehabilitation, or reconstruction of rental projects with more than five (5) units shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55-years.

- MHP policies and procedures provide that a Developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements for the entire period specified in the agreement.

- **Program Definition of Second Home/Eligibility**

- Not applicable to DR-ACCEL Program.

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- **Program National Objective(s)**

In accordance with 24 CFR 570.208, all CDBG-DR funded activities must satisfy a national objective. For the Multifamily program, all projects will meet the low to moderate income housing national objective. While proposed projects may be mixed-income, CDBG-DR funds will only be applied to the affordable units restricted for occupancy by low-to-moderate-income households.

- **Program Eligibility**

Eligibility of multifamily housing project proposals will be assessed by HCD. Specific eligibility criteria include:

Threshold Criteria

The MHP is intended to close gaps for multifamily housing projects that have secured at least one HCD funding source from a multifamily housing loan program NOFA prior to 2024 and yet face gaps limiting their ability to initiate construction. Additional threshold criteria include:

- The proposed project must be located in a MID area, DR-4683.
- The application must be complete, using unaltered application forms and including all required attachments.
- The application must include an authorizing resolution that the Department reasonable deems legally sufficient.
- The application and proposed project are in compliance with the requirements specified in the Program Policies and Procedures.
- The project must demonstrate financial feasibility for the 55-year affordability period.
- The project must comply with all federal cross cutting requirements, including prevailing wage, Section 3, and environmental review.
- If located in a floodplain, the project must meet the CDBG-DR elevation requirements and maintain flood insurance in to perpetuity.
 - Projects may not be located in the floodway.

Projects that meet this threshold criteria will be scored in accordance with the scoring criteria and tiebreaker criteria (if applicable) below.

HCD will develop an application to gather required information. At the close of the application period, projects receiving the highest points will receive an award and the Department will enter into one or more agreements with the project developer.

Program Responsible Entity

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The DR-ACCEL is administered and monitored by HCD. HCD will publish program policies and procedures to govern the program and ensure compliance with the established program policies and procedures, regulatory requirements, and broader recovery goals. HCD is responsible for overseeing the program, publishing and reviewing applications to develop new construction multifamily project units or substantially rehabilitate multifamily project units.

Multifamily developments funded under this CDBG-DR grant will adhere to standard requirements set by HCD to ensure compliance. All requirements of the MHP will be outlined in detail in the program policies and procedures. HCD will provide technical assistance to awarded developers to ensure compliance with CDBG-DR requirements and consistency with the program policies and procedures. In addition, periodic risk-based monitoring of the project construction will be conducted to test compliance and ensure timely project completion. HCD is solely responsible for making awards to successful applicants, facilitating execution of appropriate agreements including regulatory agreements to restrict MHP units within a project for a period of not less than 55-years, and overseeing compliance with all requirements of the MHP policies and procedures.

Once HCD selects projects and announces awards, the form of agreement with successful applicant developers will be a Standard Agreement which will define each party's obligations, commit funding to the project, establish timelines and milestones, and reiterate relevant compliance requirements. HCD will be responsible for monitoring developer or contractor compliance with construction advertisement and notification to minority and women-owned businesses of contacting opportunities available for the federally assisted project. HCD will monitor labor standards compliance and compliance with HUD's Section 3 quantitative and qualitative benchmarks.

- **Program Maximum Assistance**

The maximum amount of program funds available for awards is approximately \$47,214,320 million. An applicant may apply for the full amount of the project's remaining funding gap, not to exceed the available award amount. There is no per project cap for this program.

- **Program Estimated Begin and End Dates**

The DR-ACCEL program will begin following HUD's approval of the Action Plan and execution of the grant agreement with HUD and HCD. Individual construction timeframes will be specific to each selected application.

- **Program Competitive Application Overview**

Applications that pass the initial threshold review will be scored using the Scoring Criteria detailed below. In the event of tied point scores, HCD shall rank tied

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applications pursuant to the tie-breaker scoring system detailed below. Incomplete applications or others not expected to receive an award of funds due to relatively low scores may not be fully evaluated.

Scoring Criteria	Breakdown	Points
Number of units	Highest points go to projects with the most affordable units.	Within the pool of applications, Highest number of affordable units gets 5 points, Next highest gets 4 points, etc.
Leverage	Points based on lowest per unit request for program funds.	5 points = less than \$100k/unit 4 points = \$101k - \$200k/unit 3 points = \$201k - \$300k/unit 2 points = \$301k - \$400k/unit 1 point = \$401k – 500k/unit 0 points = \$501k+
Readiness	Demonstrated readiness to commence construction within 180 days of award. Confirmed site control, entitlements, funding commitments, NEPA environmental clearance.	20 points = Yes 0 points = No
Distance from DR-4683 floods	Points based on the project’s proximity to the impacted areas.	5 points = 0-10 miles 4 points = 11-20 miles 3 points = 21-30 miles 2 points = 31-40 miles 1 point = 41-50 miles 0 points = 51+ miles
Tiebreaker Scoring System		
Homeless, Special Needs and Other Population Targeting	Homeless Targeting: 0.3 points awarded for each percentage of total project units restricted to occupancy by households experiencing homelessness; or Large Family, ELI and Special Needs Targeting: 0.2 points awarded for each percentage of total project units that are <u>not</u> restricted to occupancy by households experiencing homelessness and are either: 1.3+ bedrooms 2.Restricted to occupancy by ELI households 3.Restricted to a special needs population defined as agricultural workers, individuals living with physical or sensory disabilities and transitioning from hospitals, nursing homes, development centers, or other care facilities; individuals living with developmental disabilities, serious mental illness or substance abuse disorders; individuals who are survivors of domestic violence, sexual assault, and human trafficking; individuals with HIV;	

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	families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; frequent users of public health or mental health services, as identified by a public health or mental health agency; Frail Elderly persons. “Special Needs Populations” do not include seniors unless they otherwise qualify as a Special Needs Population.
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- **Program Method of Distribution/Description/Overview**

The DR-ACCEL is an Accelerator type program to close the gaps for projects with HCD Super-NOFA for Multifamily housing and other funding for each region in the MID counties which includes activity delivery costs (ADC). HCD may consider overall distribution for final selection of Accelerator projects.

- **How Mitigation Set-Aside Activities Will Meet Definition of Mitigation?**

Not applicable.

- **How Mitigation Set-Aside Activities Will Address Current & Future Risks?**

Not applicable

Projection of Expenditures and Outcomes.

See Appendix B – 2023 Projections and Outcomes for MHU and MHP Programs

Migrant Resiliency Center Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	8-23-DG-06-0001	\$15,003,000	\$15,003,000	\$0.00

Narratives

- **Program Description**

Each year during the planting and harvesting season agricultural farm workers and their families migrate from their homes to work in California's fields and canneries. This sudden influx of family households to California's rural areas presented a strain on the already overburdened local affordable housing market. Therefore, the California Department of Housing and Community Development, through its Office of Migrant Services (OMS), contracts with local governments to provide decent and affordable housing for over 7,000 migrants, in 24 housing centers, in 15 agricultural counties. These centers are occupied between six-to-

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nine-month during the agricultural season which starts as early as March and continues as late as December. Based on this occupancy timeframe, OMS centers have had available vacancies and have been used as temporary sheltering and housing in federally declared disasters. The proposed mitigation program for this grant is intended to implement a variety of physical and infrastructure improvements to enhance the ability of OMS centers to host disaster survivors and act as Community Resiliency Centers.

In 2018, HCD contracted with Basis Architecture & Consulting, Inc. (Contractor) to conduct Physical Needs Assessments (PNA) at the 24 migrant farmworker centers. During the property investigation and research, the Contractor's property evaluator met with center operators and reviewed the property and its history. An individual PNA report was then prepared for every migrant center which included an assessment of the overall property condition, a determination of the property's Useful Life, and cost estimates for immediate repairs, critical repairs, and deferred maintenance items. After obtaining the PNAs, HCD received a \$30M general fund allocation from the State budget to complete critical repairs and deferred maintenance across the portfolio. This \$30 million covered a portion of total needs for OMS centers. The migrant centers have completed projects that include, but are not limited to, wastewater treatment plant improvements, new roofs, drainage, foundation repairs, street lighting, heating and cooling systems, ADA accessibility and asphalt repairs. All of this funding has been expended. As renovations are completed, the Department is keenly aware of the remaining needs for improvement at the migrant centers. The cost estimates based on the 2018 PNAs were not able to account for the large increase in material and labor costs in 2023. Therefore, the mitigation portion of the 23 CDBG-DR grants will allow migrant centers to complete remaining renovations and/or complete new renovation by closing funding gaps.

The capital improvements envisioned for this program will allow the OMS centers to provide enhanced opportunities to temporary shelter vulnerable populations in future disasters.

- **How will Program Meet Definition of Mitigation**

Hardening, climate retrofitting, and improving building conditions of OMS housing units to withstand future disasters meets the definition of mitigation by increasing resilience to future flooding or storm events and reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship. The 2018 CNA completed an assessment of the overall property condition, a determination of the property's Useful Life, and cost estimates for immediate repairs, and critical repairs. HCD staff will work with each PHA to finalize a site-specific scope of work that identified specific activities that meet HUD's definition of mitigation per FRN requirements.

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- **How will Program Address Current & Future Risks/Mitigation Needs Assessment**

HCD will incorporate mitigation measures into activities under the OMS Center rehabilitation by meeting required building code, which incorporates enhanced mitigation measures. The capital improvements envisioned for this program will allow OMS centers to provide temporary sheltering in future disasters. For example, there are minimum standards for materials and material assemblies to provide a reasonable level of exterior flooding exposure protection for buildings in high-risk flood zone areas whereby base-floor elevation standards are also applied. Furthermore, the program is aligned to meet policy goals and objectives as defined in the most recent State Hazard Mitigation Plan (SHMP) and the respective counties' Local Hazard Mitigation Plans (LHMP) that center on mitigating for present and future floods.

- **Program Tieback to Disaster/Unmet Needs**

The centers have been used as emergency shelters during the off season, between November and March for DR-4683 and 4699. Last year, the Empire, Hollister, Felix Torres and Arturo Ochoa centers operated emergency shelter programs for individuals experiencing homelessness, or at-risk of homelessness, or families impacted by the floods. OMS centers were also used to temporary shelter disaster survivors in 2018 (DR4407) and in 2020 (DR4558/4569).

- **Program National Objective(s)**

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR mitigation set aside funded activities must satisfy a national objective. All migrant center activities will meet either the Urgent Need, Limited Seasonal Clientele, or Low-Moderate Housing National Objective.

- **Program Eligibility**

OMS centers in MID counties are eligible for these funds.

The use of the mitigation set-aside must ensure that proposed activities are CDBG eligible under title I of the Housing and Community Development Act, or otherwise eligible pursuant to a waiver of alternative requirement in the FRN:

HCDA Section 105(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvement (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).

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The eligibility of housing projects is further established in the Consolidated Notice (FRN), 87 FR 6370, which requires HCD to address unmet housing needs with CDBG-DR funds. New housing construction is also eligible as established in the FRN, 87, FR 6371, paragraph B.1 of Section II.

Through the FRN, 87 FR 6370, HUD adopts alternative requirements to activities eligible under the Housing and Community Development Act (HCDA) Section 105(a) which allows California to carry out modified activities to comply with the requirements in the FRN to incorporate mitigation measures as a construction standard.

HCD will work with each PHA to finalize a scope of work for remaining capital needs identified to determine which meet HUD's definition of mitigation. This scope of work and other regulatory requirements will be captured in a subrecipient agreement with HCD and PHAs.

- **Program Responsible Entity**

HCD will allocate funds to each county with an operating OMS to implement activities to improve the physical condition of building or other on-site infrastructure to allow for improved community resiliency centers. HCD will provide technical assistance and oversight to Public Housing Authorities currently responsible for operations and maintenance of OMS centers in MID counties. PHA will be responsible for implementing projects, meeting environmental, labor and other federal requirements.

- **Program Maximum Assistance**

Please see table with total allocations for each county.

- **Program Estimated Begin and End Dates**

The Migrant Resiliency Center Program is expected to commence following HUD's approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

- **Other Program Details**

Not applicable

- **Program Competitive Application Overview**

Not applicable.

- **Program Method of Distribution Description/Overview**

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HCD will provide oversight for the Migrant Resiliency Center Program. Public Housing Authorities (PHAs) will be responsible for implementing project in accordance FRN requirements that meet the definition of mitigation.

OMS centers in MID counties are eligible for these funds. Using the 2018 CNA study, HCD allocated funds to each county with an OMS center based on remaining proportional needs identified for capital improvements. HCD will work with each PHA to finalize a scope of work for remaining capital needs identified to determine which meet HUD’s definition of mitigation. This scope of work and other regulatory requirements will be captured in a subrecipient agreement with HCD and PHAs.

Funding Allocation

County	OMS Migrant Center	Allocation	Percent of Total Need	Total Local Allocation
Santa Cruz	Buena Vista	\$4,251,000	28%	\$3,825,900
Merced	Merced, Felix Torres, Atwater, Rafael Silva	\$5,551,000	37%	\$4,995,900
San Joaquin	Artesi II, Artesi III, Harney Lane	\$5,201,000	35%	\$4,680,900
Total		\$15,003,000	100%	\$13,502,700

Projection of Expenditures

Not applicable

Projection of Outcomes

Not applicable

5. Appendix

a. Certifications.

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b. Waivers.

To date, HCD has not requested any additional waivers outside of the general waivers HUD included in FRN governing the 2023 allocation, 88 FR 82982.

c. Summary and Response of Public Comments.

The public comment period for the 2023 CDBG-Disaster Recovery Action Plan will be from February 28, 2024, through March 28, 2024. Public notices will be sent out with information on how to attend public meetings and submit public comment.

d. Data Sources/Methodologies.

e. Important Definitions and Terms.

AMI: Area Median Income
CBDO: Community Based Development Organization
CDBG: Community Development Block Grant
CDBG-DR: Community Development Block Grant- Disaster Recovery
CFR: Code of Federal Regulations
CO: Certifying Officer
CP: Participation
DCM: Disaster Case Managers
DOB: Duplication of Benefits
DRGR: Disaster Recovery and Grant Reporting System
FEMA: Federal Emergency Management Agency
HCD Act: Housing and Community Development Act of 1974, as amended
HMGP: Hazard Mitigation Grant Program
IA: (FEMA) Individual Assistance
LIHTC: Low-Income Housing Tax Credit
LMI: Low and moderate-income
MHU: Manufactured Housing Unit
NFIP: National Flood Insurance Program
PA: (FEMA) Public Assistance
RE: Responsible Entity
RFP: Request for Proposals
SBA: U.S. Small Business Administration
SFHA: Special Flood Hazard Area
UGLG: Unit of general local government
URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended
USACE: U.S. Army Corps of Engineers

f. Standard Form 424.