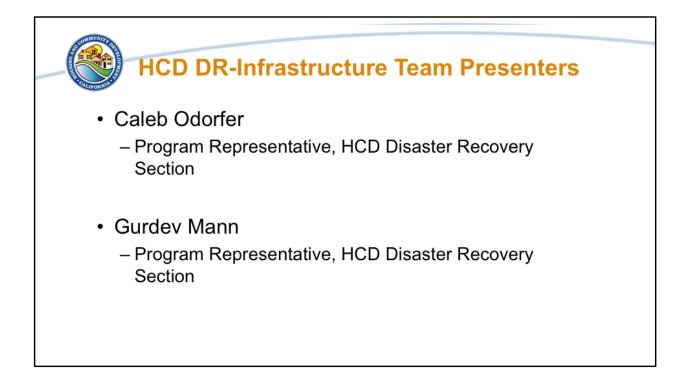
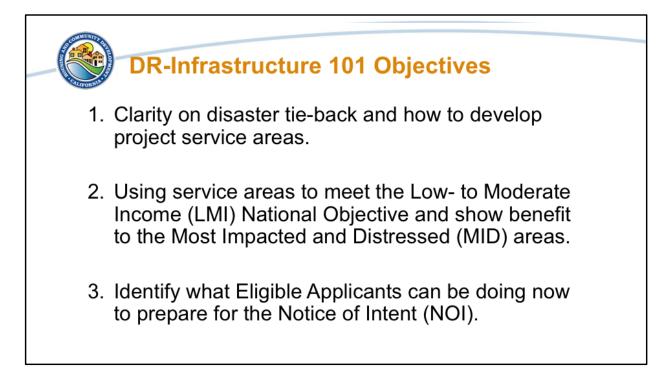


Hello and welcome to the State of California Department of Housing and Community Development's Disaster Recovery Infrastructure Program 101 webinar.



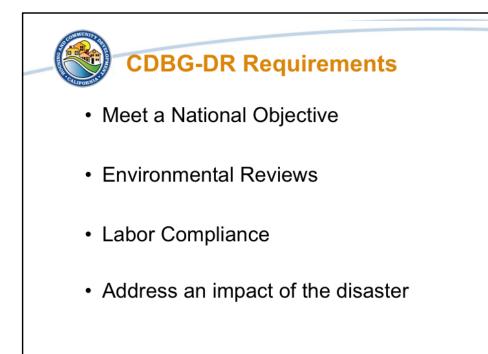
My name is Caleb Odorfer, Program Representative in HCD's Disaster Recovery Section. I am joined by my colleague Gurdev Mann, who is also a Program Representative in HCD's Disaster Recovery Section.



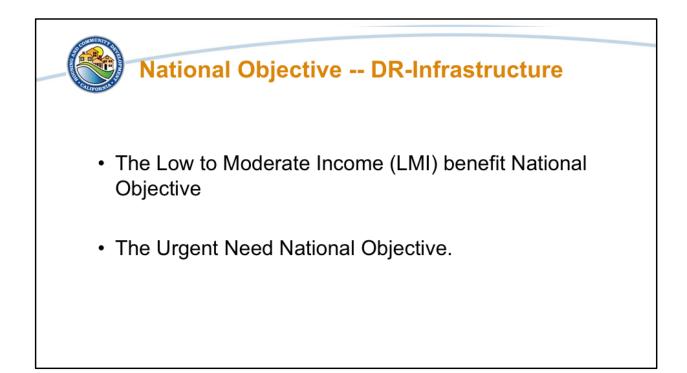
Objectives of the DR-Infrastructure 101 webinar will be to:

- 1. * Provide clarity on disaster tie-back and how to develop project service areas.
- 2. * Using service areas to meet the Low- to Moderate Income (LMI) National Objective and show benefit to Most Impacted and Distressed (MID) areas.
- 3. * Identify what Eligible Applicants can be doing now to prepare for the Notice of Intent (NOI).

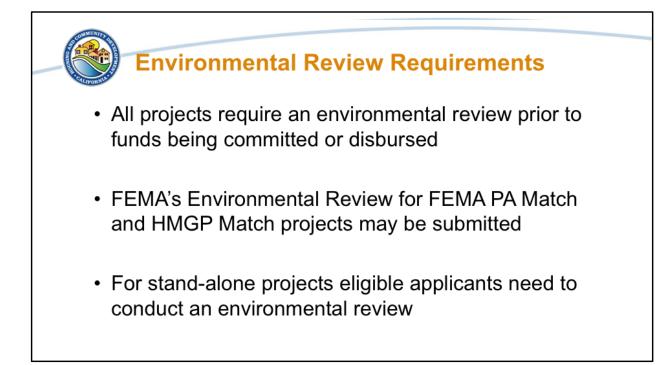
We also want to note that there may be a slight delay when we move between slides.



We will begin with a quick overview of various Community Development Block Group Disaster Recovery (CDBG-DR) requirements. To be eligible for CDBG-DR, an activity must meet a National Objective. Those are Activities Benefitting Low/Moderate Income Persons, Prevention/Elimination of Slums or Blight and Urgent Need. Projects need to have environmental reviews, and meet national and state environmental regulations. Further, projects need to meet national labor compliance standards, if the project is completed after August 21, 2019. And all CDBG-DR activities must clearly address a direct impact of the disaster in a county covered by a Presidential disaster declaration.



For the DR-Infrastructure Program, all projects must meet either: the Low to Moderate Income (LMI) benefit National Objective, or the Urgent Need National Objective. It is the responsibility of the Eligible Applicant to substantiate LMI or Urgent Need as the project's National Objective.



An environmental review that complies with National Environmental Policy Act (NEPA) must be completed before CDBG-DR funds are expended. However, HUD grantees are permitted to adopt FEMA's review if that Federal agency has previously performed an environmental review for assistance under the Robert T. Stafford Disaster Relief and Emergency Assistant Act. In those cases, the work performed by FEMA and HUD must be exactly the same work.

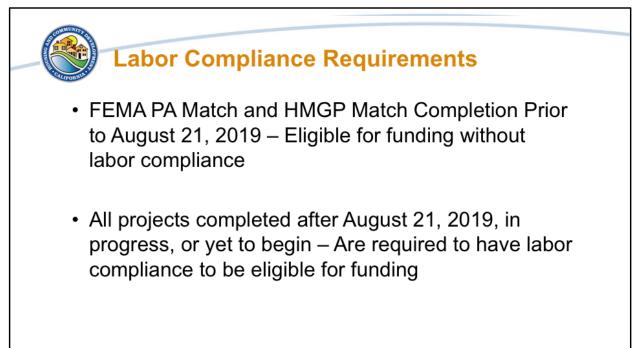
As such, eligible FEMA Public Assistance (PA) Match and Hazard Mitigation Grant Program (HMGP) Match projects may submit FEMA's completed environmental review. If a project's scope changes beyond what was approved in the project worksheet, an additional HUD environmental review must be completed. When submitting FEMA's environmental review, the Subrecipient must obtain a completed copy of FEMA's environmental review and keep the copy in its project file. If the environmental review documentation is not available, verification from FEMA or the California Governor's Office of Emergency Services (Cal OES) is necessary.

For Stand-alone DR-Infrastructure Projects, each Eligible Applicant is required to perform a NEPA environmental review on the Project prior to federal funds being committed or disbursed by HCD. The environmental review shall document

compliance with 24 CFR Part 58, NEPA, and all related laws, authorities, and executive orders.

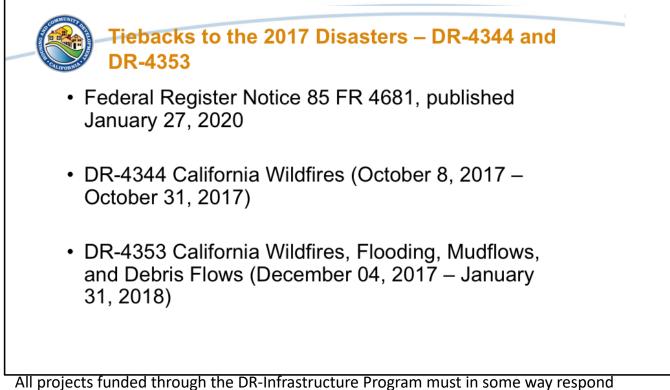
Subrecipients will be responsible for ensuring that DR-Infrastructure Program projects are in compliance with the California Environmental Quality Act (CEQA) and obtain all necessary local and state permits.

More details can be found in the forthcoming Policies and Procedures.

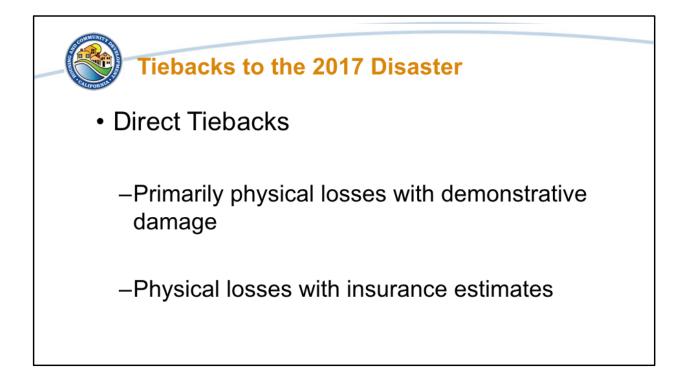


Due to the date that HCD signed the agreement with HUD, any FEMA PA Match and HMGP projects completed prior to the date of August 21, 2019 that were not Davis Bacon or Section 3 compliant are eligible for non-federal match funding under the DR-Infrastructure Program. Eligibility of FEMA PA Match or HMGP Match projects that were completed after August 21, 2019 or are in progress at the time of the application requires that the Eligible Applicant must show project compliance with federal regulations and federal labor regulations (i.e. Davis Bacon Compliance and Section 3).

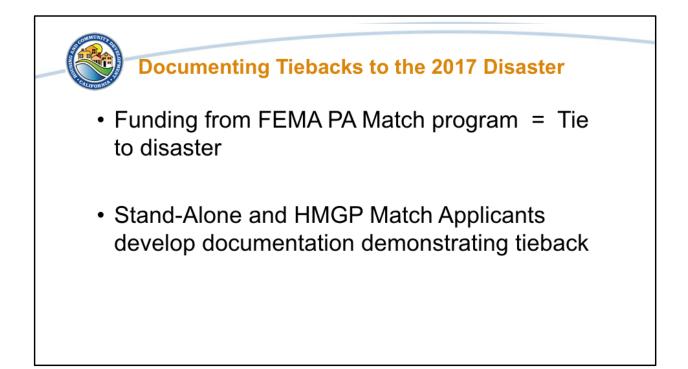
Stand-alone projects are required to have labor compliance (i.e. Davis-Bacon and Section 3) in order to be eligible for funding under the CDBG DR-Infrastructure Program. More specifics regarding compliance can be found in the forthcoming Policies and Procedures Manual.



All projects funded through the DR-infrastructure Program must in some way respond to a direct impact from the following federally declared disasters as per Federal Register Notice 85 FR 4681, published January 27, 2020, to address the unmet infrastructure recovery needs, related to: DR-4344 California Wildfires (October 8, 2017 – October 31, 2017) or DR-4353 California Wildfires, Flooding, Mudflows, and Debris Flows (December 04, 2017 – January 31, 2018).



Direct Tiebacks are the clearest and most demonstrative type of impact from the disaster. This is primarily physical losses with demonstrative damage or physical losses with insurance estimates (the most effective tool) . An important consideration for direct tiebacks is that the damage isn't always evident right after the disaster. Months or years later, the damage to infrastructure might show itself.

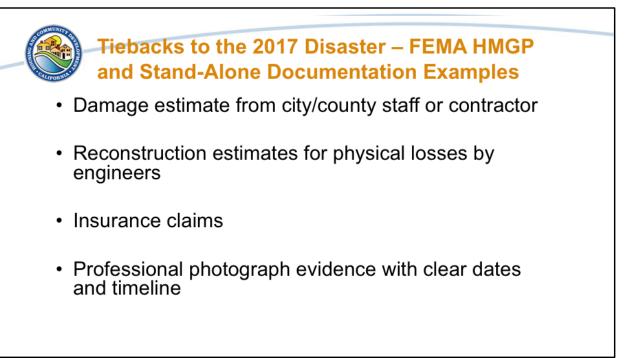


The FEMA PA program requires clear documentation showing a direct disaster-related impact as a prerequisite for entry into FEMA PA program. Only after an impact threshold has been met will FEMA consider making disaster funds available to applicants. It is assumed that if the potential applicant received funding and support through the FEMA PA program, the submitted FEMA PA Match project has a tie to one of the declared disasters. For FEMA PA Match projects, that tie to the 2017 disasters is documented by FEMA's approval of the Project Worksheet. That documentation will need to be uploaded as part of the Notice of Intent (NOI) and Application process.

For the Stand-Alone and HMGP Match projects, the tie to the 2017 disasters is documented as part of the NOI and Application process and stored in the program file. In practice, this means that you will need to upload the documentation demonstrating the projects tie to the 2017 disasters into Grants Network. The specifics of Grants Network will be covered at another time.

A consideration on project eligibility and disaster tieback is that if FEMA determined that a PA project is ineligible due to lack of evidence of disaster tieback, and that project is being submitted to HCD as a Stand-Alone project, it will be difficult for HCD

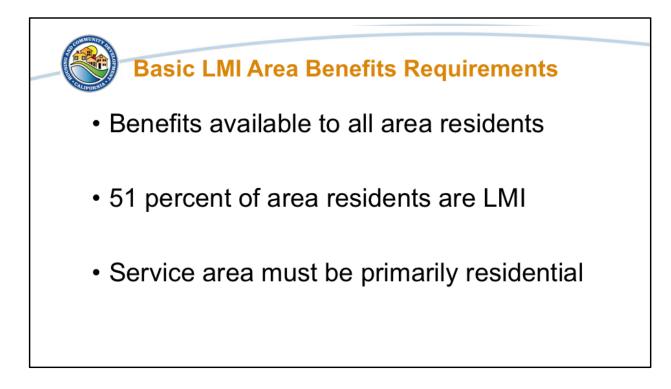
to fund that project unless the Eligible Applicant has substantial evidence. #



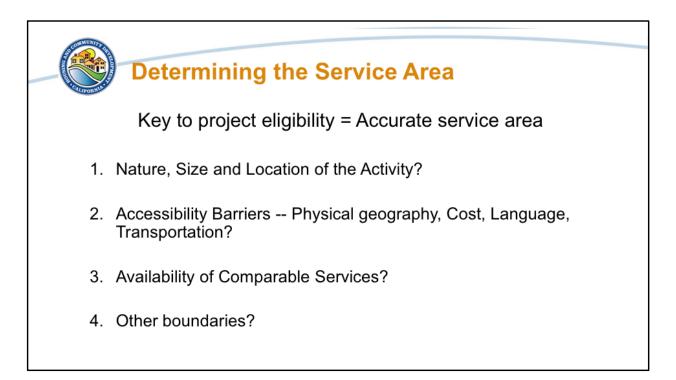
Documentation that can show a direct impact can include, but is not limited to: Damage estimate prepared by city/county staff or contractor; Reconstruction estimates for physical losses by engineers or other similar professionals; Insurance claims; or Professional photograph evidence of the physical impact of the disaster on the project with clear dates and timeline.



Projects will be funded according to Priority Levels as well as a pro rata schema, the final details of which will be in the forthcoming Policies and Procedures. The Priority Levels were set to enable HCD to achieve the target goals of 80% MID funding and 70% LMI benefit funding as required by the Federal Register Notice. The Priority Levels are: Priority 1: MID Benefit and LMI Service Area Benefit. Priority 2: No MID Benefit, but LMI Service Area Benefit. Priority 3: MID Benefit, No LMI Service Area Benefit. No LMI Service Area Benefit.



Basic qualification requirements for an LMI area benefit include: The benefits are available to all area residents. At least 51 percent of the area residents are low- and moderate-income persons. At least 51 percent means 51 percent or greater, so no rounding up! Service area must be primarily residential. As a note, while LMI area benefit is the main methodology used to show LMI, there are others that could be used. It all depends on the activity.

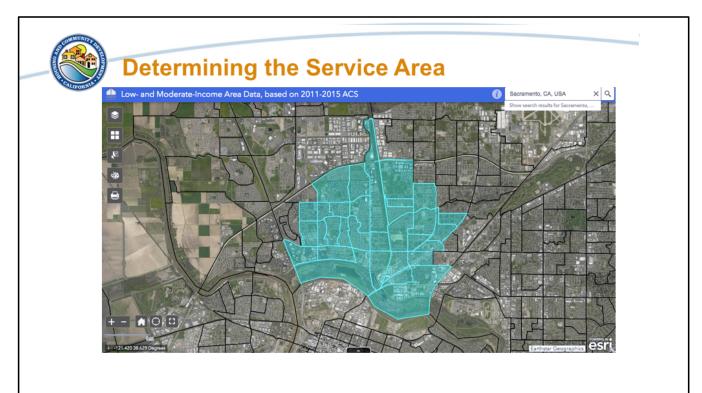


When developing the Service Area the primary question is: What is the area that will benefit? This is crucial as a key component for demonstrating project eligibility is being able to accurately identify the project's service area and who it serves. We suggest seeking input from an expert on both the infrastructure project and on the geography and population it overlaps and serves.

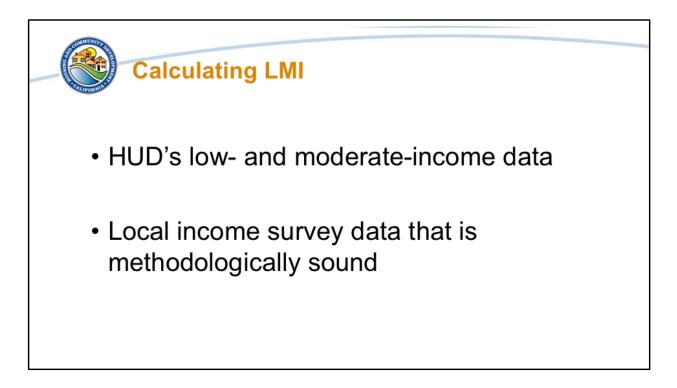
When drawing the service area consider: 1. What is the Nature, Size and Location of the Activity? 2. What are the Accessibility Barriers related to Physical geography, Cost, Language, Transportation, etc.? In other words, are people able to easily access the activity? 3. What is the Availability of Comparable Services? Are there other services that already provide the same or similar benefit to the area? 4. What other boundaries, such as fire districts or utility networks are there? Will this hinder or hamper your efforts or cause a duplication of services?

Things to remember are that Boundaries do not need to be coterminous with Census %

boundaries. i.e. it does not need to be an exact match between the service area and the census area with LMI. What it must be is a **REASONABLE** Boundary that is based upon the nature of the activity



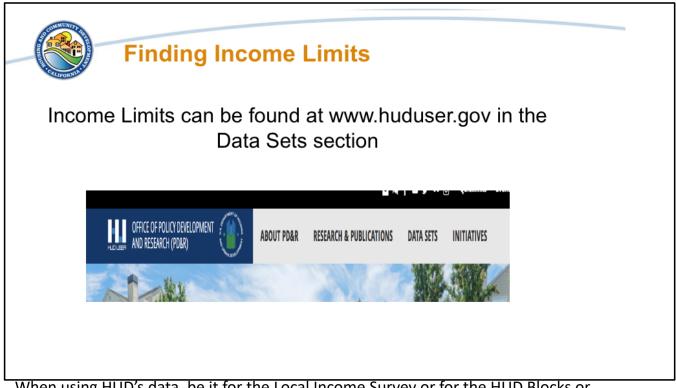
Things to remember: A service areas might overlap with multiple Blocks, like in this example of a hypothetical service area in Sacramento. We can see that the blue "service area" incorporates several HUD Blocks. When this happens you will need to calculate the LMI of all the blocks together to find the total LMI for that service area.



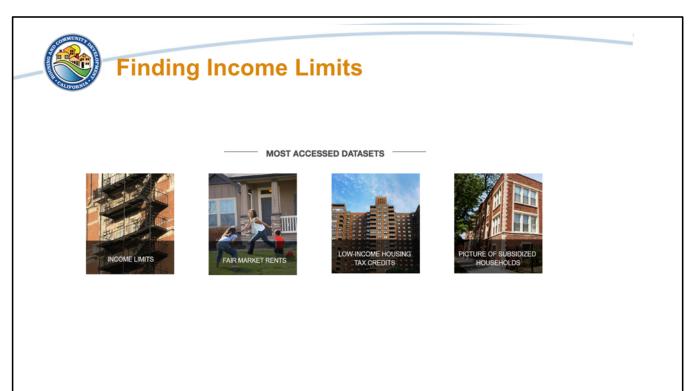
To calculate the LMI service benefit area Eligible Applicants may use either: HUD's low- and moderate-income data, or local income survey data that is methodologically sound. It is recommended to use HUD's low- and moderate-income data first, but we will start with an overview of how to use Local Income Survey's as it provides a glance into the process as it gives an idea of how HUD approaches the data before diving into how to use HUD's data.

Methods of Local Income Surveys Collection Methods: Questions to ask: Door-to-Door Surveys Mail Surveys Telephone Surveys Web Surveys Race/Ethnicity

There are four primary methods of collecting Local Income data:1. Door-to-Door Surveys; 2. Mail Surveys; 3. Telephone Surveys; and 4. Web surveys. There are also four basic questions to ask. 1. Number of families in the household? This is because HUD CDBG goes beyond normal requirements and considers unrelated people living in a house to be separate families for the purposes of the LMI. 2. Number of persons in a family? 3. Family Income. If people are not comfortable providing family income, ask if the family income is above or below the Family Income Limit, and 4.Race/Ethnicity.



When using HUD's data, be it for the Local Income Survey or for the HUD Blocks or Places it is good to know where to find Income Limits. Income Limits can be found at www.huduser.gov in the Data Sets section.



In the Data Sets page find the HUD Data for Income Limits on the Income Limits Section.

A CONTRACTOR OF THE PARTY OF TH	Using HUD Income Limits Data Sets
	2020 2019 2018 2017 2016 2020 -
	Query Tool Data FAQs
	Effective April 1, 2020.
	Access Individual Income Limits Areas
	This system provides complete documentation of the development of the FY 2020 income Limits (ILs) for any area of the country selected by the user. Official ILs, available in pdf and excel formats at this link, may differ slightly from those calculated in the documentation system, and should be used for ALL official purposes. Click Here for FY 2020 IL Documentation
	NOTE: Due to the Housing and Economic Recovery Act of 2008 Public Law 110-28(8) the data presented in this system may not be applicable to projects financed with Section 42 Law Income Housing Tax Credits (LHTC) or section 142 tax exempt private equity bonds. These projects should use the Multifermily Tax Subsidy Project Income Limits available at Multifermily Tax Subsidy Project Income Limits
	Access Individual Median Family Income Areas
	This system provides concentration of the development of the FY 2020 Median Family income (MFI) estimates for any area of the country selected by the user. After selecting the development was is provided a page containing a detailed account of how the final FY 2020 MFIs were developed using data from the 2012 American Community Survey (ACS) data.

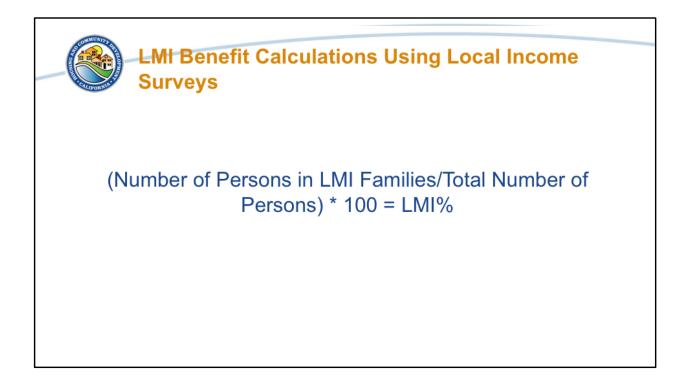
On the Income Limits page select the year (2020 in this example). Next choose Individual Limits.

First selfct a state: The select a state: <	Using Hl	JD Income Limits Data Sets
Alabama -AL Alabama -AS Artencian Samoa -AS Artencian Samoa -AS Artencian -AZ Artencian -AX Artencian -AZ Artencian -AX Artencian -AX	HEUGER	FY 2020 Income Limits Documentation System
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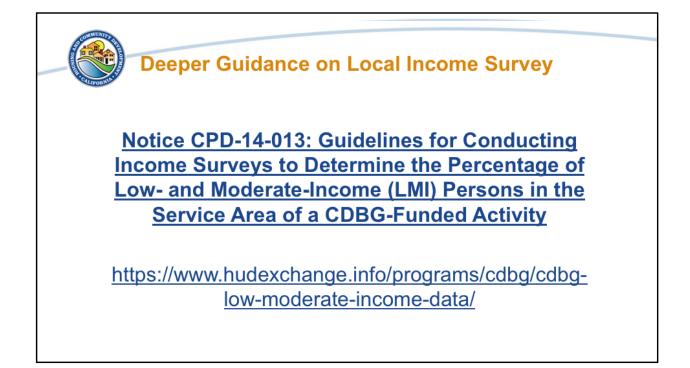
Next select your state and then your county. In this example, we are choosing Sacramento.

HUD In	come	Limits D)ata	Se	ts					
FY 2020 Income Limit Area	Median Family Income Explanation	FY 2020 Income Limit Category	1	2	3	Persons i 4	n Family 5	6	7	8
	o \$86,300	Very Low (50%) Income Limits (\$) Explanation	30,250	34,550	38,850	43,150	46,650	50,100	53,550	57,000
SacramentoRoseville Arden-Arcade, CA HUD Metro FMR Area		Extremely Low Income Limits (\$)* Explanation	18,150	20,750	23,350	26,200	30,680	35,160	39,640	44,120
		Low (80%) Income Limits (\$) Explanation	48,350	55,250	62,150	69,050	74,600	80,100	85,650	91,150

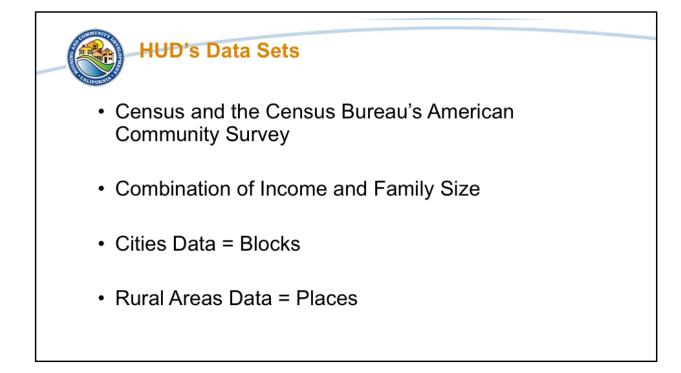
Use the LOW, 80% of median family income, category to find the Low- and Moderate-Income Limit for the selected area. For Sacramento County we can see that in the yellow highlighted category shows 80% of median family income, the Low- and Moderate-Income Limit, for a family of four is \$69,050.



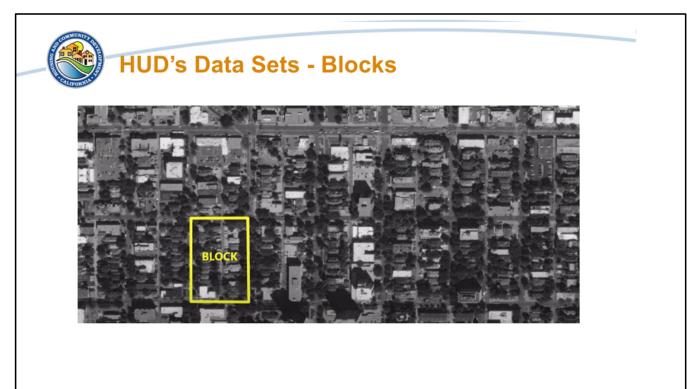
Once you have collected all the appropriate data you the use the following formula to calculate the LMI% of the area surveyed. (Number of Persons in LMI Families/Total Number of Persons) * 100 = LMI%.



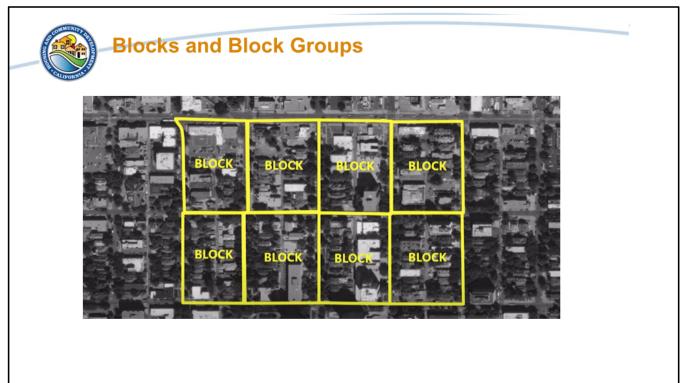
More guidance on how to do an Income Survey, from confidence intervals to sample size can be found in: <u>Notice CPD-14-013</u>: <u>Guidelines for Conducting Income Surveys</u> to Determine the Percentage of Low- and Moderate-Income (LMI) Persons in the <u>Service Area of a CDBG-Funded Activity</u>. You can also find more information about calculation specifics at <u>https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data/</u>. An important thing to keep in mind is that the basis for all the confidence interval thresholds and the sample size if you are doing your own survey is that it has to be at least as good as the HUD provided data. Given the resources and time needed to devote to doing a Local income survey we highly recommend using HUD's data.</u>



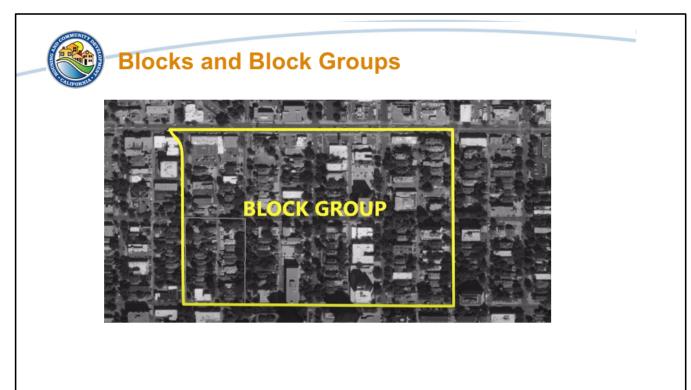
HUD's data is from the Census and the Census Bureau's American Community Survey. HUD combines Income and Family size data. For Cities Data is formed into Blocks (i.e. the homes on a single street block) and for Rural Areas Data is formed into Places. Something to keep in mind is that Block Groups are the best granular data for urban areas LMI Service Areas and Places are the best granular data for rural areas LMI service areas.



This is an example of a Block. You can see that it is all the residences along a single street unit.



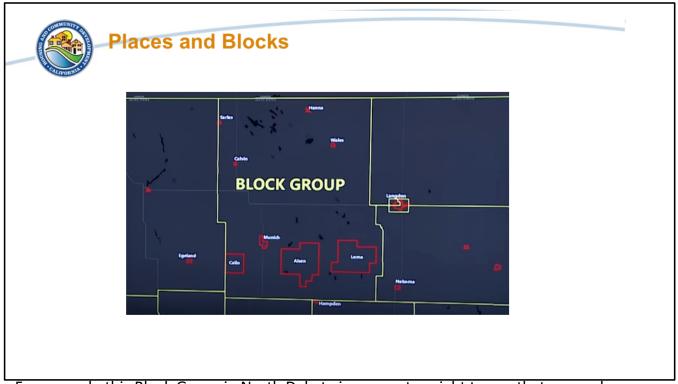
Next you can see how the Blocks in a single geography can line up. As a note, blocks are based on residences and don't contain economic data, so that's why we can only use block groups and tracts for LMI calculations.



The Blocks in a single geography are then formed into a Block Group which is HUD's basic unit of provided data that they combine with Census data to get the economic information. Something to keep in mind is that Block groups can and will be combined to create the service area for your activity.

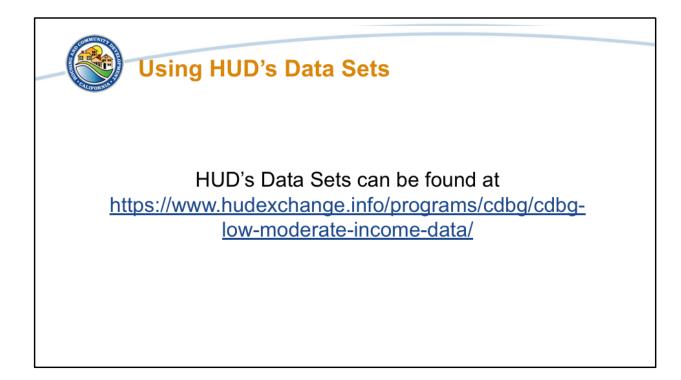


Rural areas are different than cities due to the lower population density. As such the unit of data HUD provides for LMI Service Area Calculations is for a Place, which often incorporates a town. As Block Groups are based on population size, rural area's Block Groups will often incorporate multiple small towns.

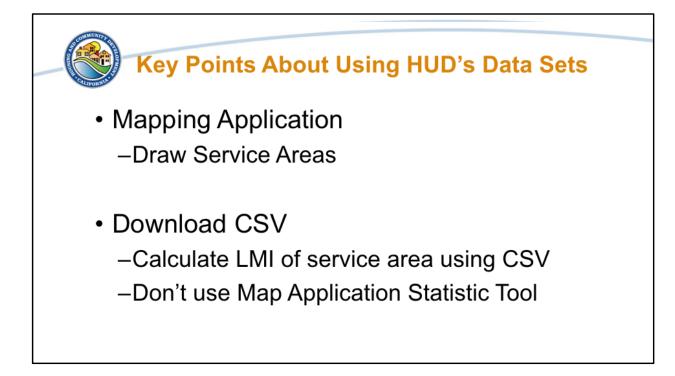


For example this Block Group in North Dakota incorporates eight towns that are each separate Places.

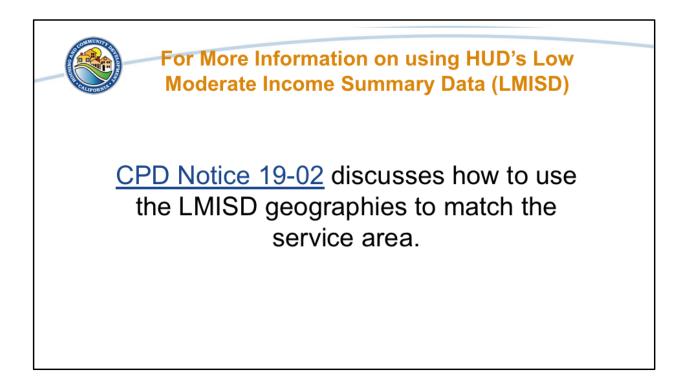
As most activities for Places and Jurisdictions won't benefit an entire rural Block Group, you won't calculate the LMI based on the Block Group.



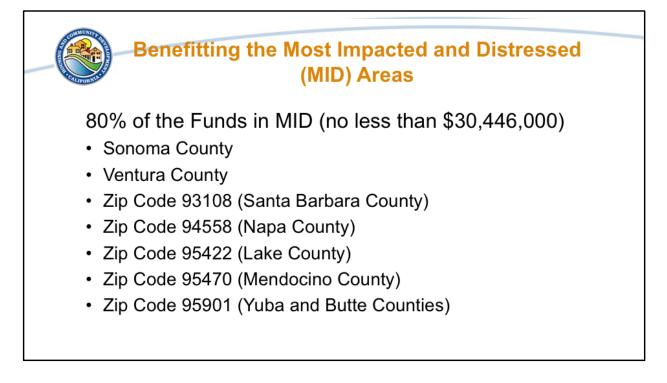
HUD's data sets can be found at HUD Exchange under their CDBG LMI Data page. There you can find tutorials that will walk you through exactly how to use HUD's data to map service areas and calculate the service area's LMI. If you have any further questions about using HUD's data please email us or bring your questions to an Office Hour session.



There are a few important Key Points about using HUD's data that we do want to mention here though. First, is that the easiest way to get the information is to use HUD's Mapping Application. There are different way to get the information but this is the easiest to generally draw your service areas and get the LMI for the area. Further, if you don't have a GIS person on your team HUD's mapping application can be helpful. The second key point is to make sure to download the CSV spreadsheet for the service area if you draw it in HUD's mapping application. It is important to have the real data to make your calculations for the service area's LMI. Don't use the Map Application's Statistic tool as it rounds up the percentages before calculating the average and will give you the wrong number.



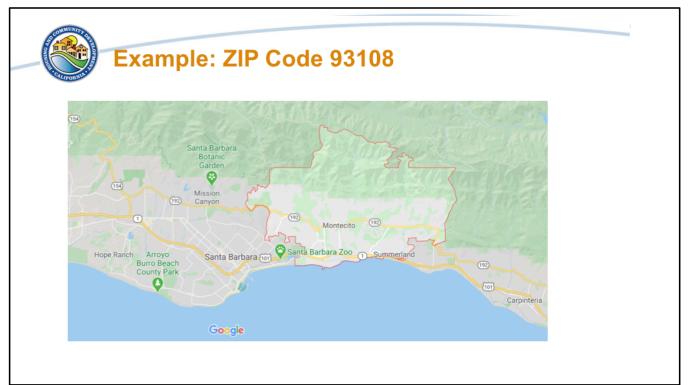
You can find more details in CPD Notice 19-02 which discusses how to use the LMISD geographies to match the service area. The LMI percentages are determined for various geographies, including each block group, each local government (both incorporated and unincorporated cities and towns, i.e. "places"), and each CDBG grantee.



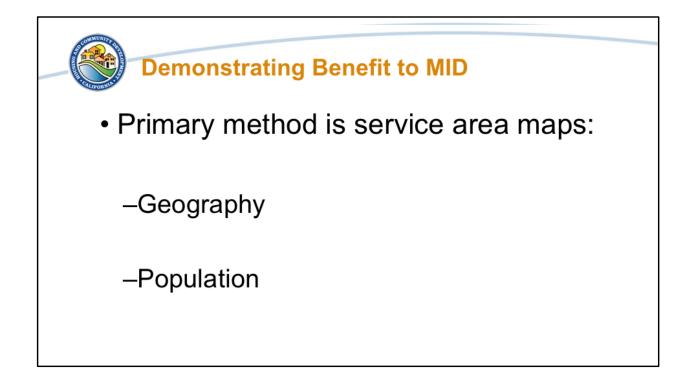
Per 85 FR 4681, Published January 27, 2020, 80% of the Funds (no less than \$30,446,000) must go towards activities in the MID which are established as Sonoma County, Ventura County, and the zip codes: 93108, 94558, 95422, 95470, 95901.



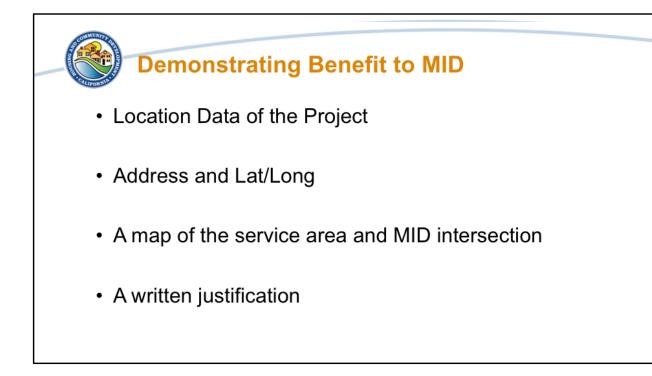
Eligible Applicants that intend to qualify projects under Priority 1 or Priority 3 need to show that the project's service area benefits MID areas.



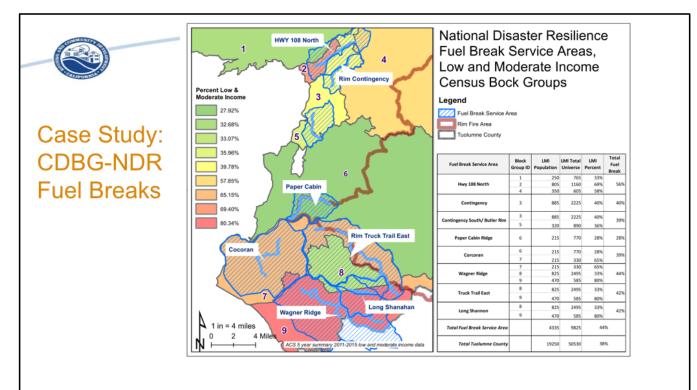
When submitting projects under Priority 1 and Priority 3, the Eligible Applicant must show that the project's service area provides a benefit to MID. Under the 2017 CDBG-DR funds, the MID is limited the exact boundaries listed in the Federal Register Notice, so under the example of this map of ZIP code 93108 in Santa Barbara County, the project's service area must show a benefit to the geographic area of ZIP code 93108 or the population contained within ZIP code 93108. More specifically for this example, the Eligible Applicant will need to show how the service area benefits the 93108 ZIP Code.



Benefit of the MID can be shown in a different ways. Primary methods to demonstrate the benefit of the activity to the MID is through service area maps focused on either: Geography or Population. Geography is when the benefit to the MID can be demonstrated with a service maps showing how the activity is located within the MID, or it services the geographic area of the MID. Population MID benefit is when the service maps that demonstrate how the activity being funded services the people living in the MID and who were impacted by the disasters.



To demonstrate benefit to MID, Eligible Applicants need to provide: Location Data of the Project, Address and Lat/Long and A map of the service area and the intersection with the MID. Eligible applicants also need to submit a written justification of how the activity services the MID. More information will be available when the Policies and Procedures are released.

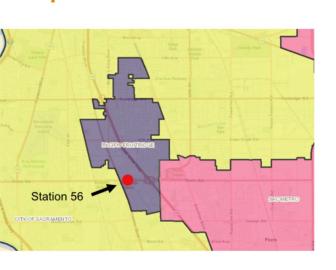


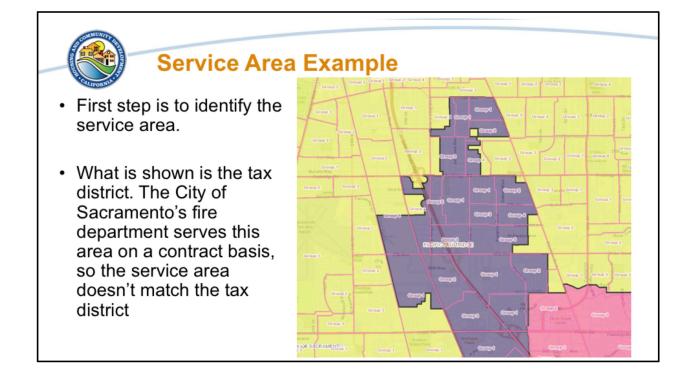
This is a case study from for CDBG-NDR on Fuel Breaks that has a service map putting it all together– LMI Blocks, MID, and service areas. HCD partnered with CAL FIRE and the USFS on this project to install fuel breaks in Tuolumne County, which for this examples is being used as a MID. CAL FIRE, as the experts, completed the analysis to define the service area for each fuel break. As a reminder it is important to consult experts for the role of defining the service area. Then the LMI population was calculated using the block groups that intersected with the service area. The orange and above on the map indicates the LMI blocks, and in the chart, there is more specific information regarding the LMI breakdown. The key takeaway is if you're working with other agencies or departments on DR-Infrastructure projects, especially with PA Match and HMGP Match, it is important to work with those agencies and/or departments to determine the project's service area or areas. In this project's case, multiple service areas were combined to create a single LMI benefit percentage.

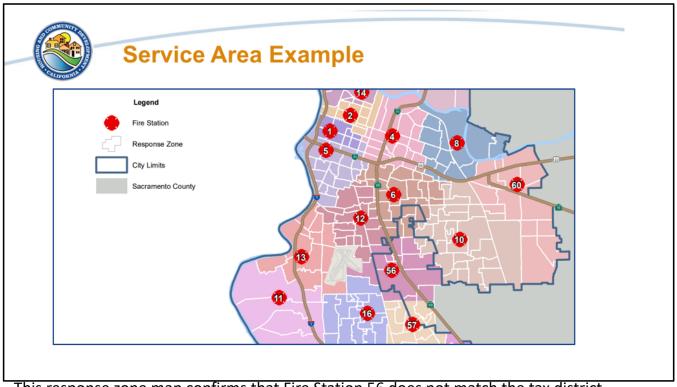


Service Area Example

- Example: Replacement of Fire Station 56 within the Pacific Fruitridge Fire Protection District in Sacramento County.
- Assume it was damaged by a disaster.





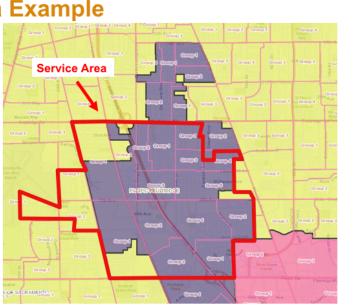


This response zone map confirms that Fire Station 56 does not match the tax district as shown in this map. While the tax districts are found using Sacramento County's GIS online map system, you may need to contact other departments or dig deeper to determine the service area.



Service Area Example

- Use all fully contained block groups, as well as partially contained block groups as part of the service area.
- HUD will not allow block groups to be prorated.

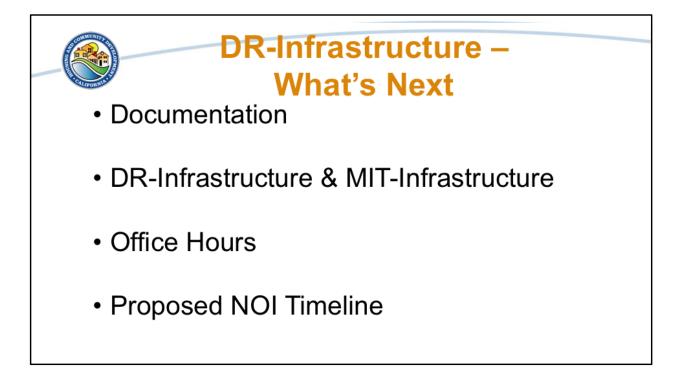


Because the service areas are not likely to line up perfectly with block groups, use all fully contained block groups, as well as partially contained block groups, even if the service area boundary only intersects with one percent of the block group. HUD will not allow block groups to be prorated. All of the block groups shown within the service area are over 51% LMI, so this project would meet the LMI national objective.

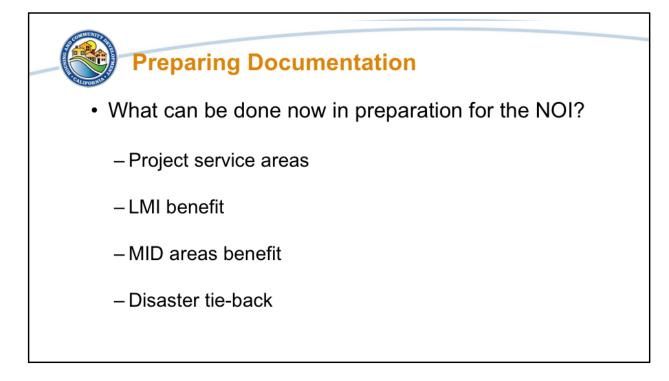


Service Area Example: Key Takeaways

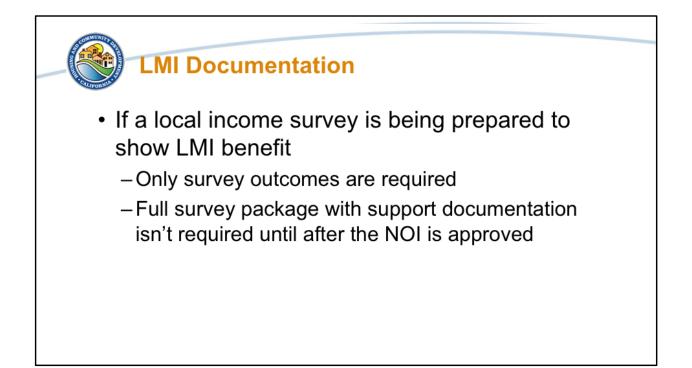
- Provide detailed documentation on <u>who</u> the project serves. Especially important for projects that don't have a clear service area (e.g. road/bridge projects).
- In your LMI calculations, include all block groups that are within and partially overlap the service area. If those partial block groups change the benefit area to below 51% LMI, consider an income survey.



The next slides will describe what's next with the DR-Infrastructure program, how this program relates to the MIT-Infrastructure, office hours sessions, and the proposed NOI timeline.



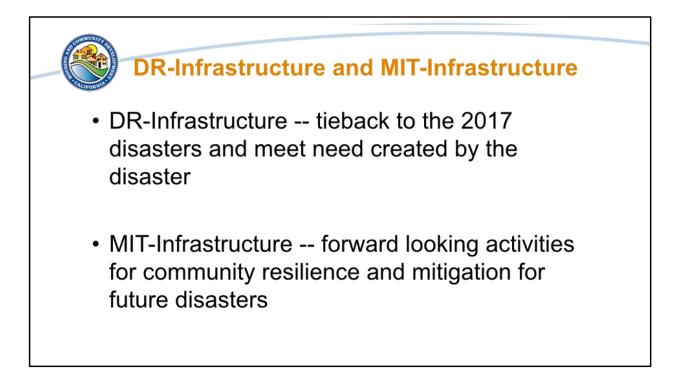
What can be done now to prepare for the NOI: Develop service areas for all projects by creating maps of the service area. Use the service area and use HUD's LMI data to determine if the project might benefit an LMI population. Also use the service area to see if it benefits the MID areas as defined by HUD. Gather documentation on a direct disaster tie-back.



If you are going to use a Local Income Survey, you will also need to develop and conduct that as well. Only survey outcomes are required. The full survey package with support documentation isn't required until after the NOI is approved. Once again, our recommendation is to use HUD's provided data to calculate the LMI benefit, given the resources and time involved in conducting a Local Income Survey.



CDBG Mitigation is another grant program being launched for communities impacted by DR-4344 and DR-4353. \$61 million is directed toward Infrastructure needs. While there is no tie-back requirement for the MIT-Infrastructure Program, there are specific mitigation and resiliency requirements. HCD will hold a webinar on MIT-Infrastructure 101 diving into more details about the program will be held in late September. Details will follow in the next few weeks.



The two programs can work together, but the key is that: DR-Infrastructure is focused on activities that have a tieback to the 2017 disasters and are meeting a need that is a loss created by the disaster; and MIT-Infrastructure are forward looking activities to make something (either impacted or not impacted) stronger so as to make the community more resilient and mitigate the impacts of future disasters.

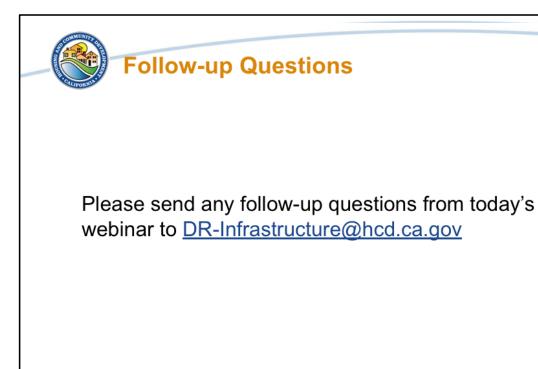


HCD will be holding individual office hours in September and October on Tuesdays and Thursdays. There are office hours set aside for the morning and afternoon at 10 am and 3 pm. All Primary Points of Contact for each Eligible Applicant should have received the announcement regarding the individual webinars that includes a Doodle Poll link to sign up for an office hour. Please use the Doodle Poll that was shared to sign up for a session. They are first come, first served.

If there are questions about how to develop a service area, where to find the data needed to calculate the LMI benefit, or other technical assistance questions, these sessions are for that purpose. Please note that HCD will not be determining project eligibility at these office hours meetings.



It is anticipated that the NOI will be released in October 2020. The NOI will be fillable by the Eligible Applicants but cannot be submitted until the NOI submission period opens in November 2020. The NOI will stay open through December 2020. NOIs will be reviewed in early-2021 and grant awards will be made following review.



Please send any follow-up questions from today's webinar to DR-Infrastructure@hcd.ca.gov. All follow-up questions will be answered and shared by email with the Eligible Applicants' Point of Contacts







That concludes DR-Infrastructure 101. Thank you all for joining us today. Once again if you have any questions regarding today's webinar please contact us at DR-Infrastructure@hcd.ca.gov. The PDF of this presentation and any follow-up questions and answers will be shared with all eligible applicants. We look forward to seeing at the individual Office Hours starting in September. Thank you and have a great day.



Follow-up Question

 In the CDBG-DR-Infrastructure webinar "family income" was referenced vs. "household income". Could you please clarify? Generally, we count all members of a household, whether or not related, as a household and use HUD's income limits, which are provided by household size. In the case of more than one family occupying a single unit, all occupants constitute a household.



The DR-Infrastructure Program uses family income to calculate income for area benefit activities, but household income is used for all housing activities. Because this is strictly an infrastructure program and no tie to housing is required, HCD will require the use of family income when income surveys are conducted.

Regarding your question about more than one family occupying a single unit, family income is based on the size of a cohabiting family (i.e. the "related"* number of people living within a residence). If "unrelated" people are living in a together residence or household then they are categorized as separate families for the purposes the DR-Infrastructure Program and their family incomes will be calculated separately.

