

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF FINANCIAL ASSISTANCE**

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Friday July 31, 2020

Mr. Robert Kard
Air Pollution Control Officer
San Diego Air Pollution Control District
10124 Old Grove Road
San Diego, California 92131
Transmitted via email: robert.kard@sdcounty.ca.gov

Re: Tiered Environmental Review of Single-Family Home Projects in San Diego
County
2017 Community Development Block Grant Disaster Recovery

Dear Mr. Kard:

The State of California's Department of Housing and Community Development (HCD) is serving as the lead and responsible agency for administering the Community Development Block Grant – Disaster Recovery (CDBG-DR) from the U.S. Department of Housing and Urban Development to support long-term recovery efforts following the federally declared disasters in October 2017. The 2017 CDBG-DR program will provide grants to owner-occupied homeowners to rehabilitate or reconstruct homes damaged or destroyed by the October 2017 disasters (DR-4344). Under the CDBG-DR funding umbrella, HCD has established an Owner-Occupied Rehabilitation and Reconstruction Program (the "Program") to support long-term recovery efforts and address unmet housing needs in areas impacted by the 2017 disasters. The program is designed to ensure that the housing needs of very-low, low- and moderate-income households and vulnerable populations are addressed to the greatest extent feasible.

The Program will allow affected residents to apply directly to the State for gap financing grants to repair or reconstruct their single-family homes. Projects under the program are expected to involve repair/rehabilitation or reconstruction of single-family dwellings, such as stick built, modular, or manufactured housing unit. Reconstruction has been defined by the Program as the rebuilding of a structure on the same site in substantially the same footprint and manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

HCD is facilitating the federally-required environmental reviews for the Program in San Diego County and 11 other California counties in accordance with 24 CFR Part 58.

As specified in the State of California, March 19, 2019 *Action Plan for Disaster Recovery*, the best currently available data suggests that approximately 400 homeowners may seek funding through this program. Individual project sites will be reviewed as part of Tier 2 once those sites are identified.

To expedite environmental review while complying with Part 58 and other applicable laws and regulations, HCD seeks to provide the San Diego Air Pollution Control District with notice of the program and to obtain written confirmation that the proposed activities will be in compliance with the Federal and California air quality standards for the following types of single-family housing unit projects:

1. Replacement of damaged or destroyed necessary equipment, such as HVAC units;
2. Repairs to disaster-damaged primary structures;
3. Reconstruction of the disaster-damaged primary structure;
4. Upgrades required to meet current building code (including the 2019 Building Energy Efficiency Standards, where applicable);
5. Site work to meet California Wildland Urban Interface standards for homes in high risk areas;
6. Addition of handicap accessibility features (if applicable); and,
7. Lead-based paint and asbestos abatement (if applicable).

HCD anticipates that the actions of the program will conform to the State Implementation Plan because they are not anticipated to:

1. Cause or contribute to a new violation of any existing standard;
2. Increase the frequency or severity of any existing violation of any standard; or
3. Delay timely attainment of any standard.

Mitigation measures, such as dust suppression, covering haul loads, vehicle idling reduction, and spill mitigation measures, among others, are examples of best management practices that may be implemented during program activities.

HCD is requesting a response letter addressing the project work within your jurisdiction in San Diego County to document completion of coordination with the San Diego Air Pollution Control District and compliance with Federal and State air quality standards.

HCD is dedicated to providing disaster assistance to people in need of single-family housing as a result of the 2017 disasters as soon as possible. Due to the importance of this matter, we ask that you please respond electronically to Joseph Helo at Joseph.Helo@hcd.ca.gov no later than 30 days from receipt of this letter.

Thank you in advance for your assistance, if you have any questions or would like additional information please contact Joseph Helo at (916) 263-6693 or Joseph.Helo@hcd.ca.gov.

Sincerely,

Janice L. Waddell

Janice L. Waddell

Branch Chief, Federal Programs