



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

*Office of the Executive Officer*  
*Wayne Nastri*  
909.396.2100, fax 909.396.3340

August 14, 2020

Mr. Joseph Helo, Disaster Recovery Housing Program Manager  
California Department of Housing and Community Development  
Division of Financial Assistance  
2020 West El Camino Avenue, Suite 200  
Sacramento, California 95833  
Sent via e-mail: [Joseph.Helo@hcd.ca.gov](mailto:Joseph.Helo@hcd.ca.gov)

Dear Mr. Helo:

Thank you for reaching out to the South Coast Air Quality Management District (South Coast AQMD) for coordination on the California Department of Housing and Community Development's (HCD) tiered environmental review of projects in Orange and Los Angeles counties for the 2017 Community Development Block Grant Disaster Recovery Program (Program) to support the State of California's unmet recovery needs related to the Federal Emergency Management Agency Major Disaster Declarations in October 2017 for wildfires and December 2017 for wildfires, mudflows, and debris flows.

The Program will provide grants to owner-occupied homeowners to rehabilitate or reconstruct single-family homes damaged or destroyed by the 2017 disasters and address unmet housing needs focusing on the HUD-defined Most Impacted and Distressed areas. Reconstruction involves the rebuilding of a structure on the same site in substantially the same footprint and manner, while reconstruction does not allow for the increase in dwelling units on the site. In accordance with U.S. Code of Federal Regulations Title 24 Part 58, the HCD is currently conducting Tier 1 of the environmental review which is a county-wide environmental review and will conduct Tier 2 site-specific environmental reviews once individual single-family home project sites are selected.

The South Coast AQMD supports providing disaster assistance to people in need and does not have any air quality concerns associated with the Tier 1 environmental review at this time. When the HCD conducts Tier 2 environmental reviews of selected homes, South Coast AQMD appreciates the opportunity for continued coordination to address any air quality questions or

Mr. Joseph Helo

August 14, 2020

concerns that may arise, such as lead-based paint, South Coast AQMD Rule 1403<sup>1</sup> requirements for asbestos abatement, and Rule 403<sup>2</sup> requirements for reducing fugitive dust emissions and may provide comments on air quality issues in the future documents.

We look forward to working together to support your long-term recovery efforts and reduce air pollution.

Sincerely,



Wayne Natri  
Executive Officer

WN:PF:SN:JW:ls

cc: Ms. Janice L. Waddell, California Department of Housing and Community Development  
Ms. Amanda Ohman, California Department of Housing and Community Development  
Ms. Susan Naramore, California Department of Housing and Community Development

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<sup>1</sup> South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

<sup>2</sup> South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

## Helo, Joseph@HCD

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**From:** Jillian Wong <jwong1@aqmd.gov>  
**Sent:** Friday, August 14, 2020 3:25 PM  
**To:** Helo, Joseph@HCD  
**Cc:** Waddell, Janice@HCD; Ohman, Amanda@HCD; Naramore, Susan@HCD; Wayne Nastri; Jill Whynot; Philip Fine; Susan Nakamura; Lijin Sun  
**Subject:** FW: Tiered Environmental Review of Single-Family Home Projects in Orange and Los Angeles Counties  
**Attachments:** South Coast AQMD HCD Response Letter 8-14-20.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon Mr. Helo,

Attached is South Coast AQMD's response to your letter dated July 31, 2020.

Have a wonderful weekend,  
Jillian Wong, Ph.D.  
Planning and Rules Manager  
South Coast AQMD  
21865 Copley Drive,  
Diamond Bar, CA 91765  
Direct: 909-396-3176  
Fax: 909-396-3640

**From:** Helo, Joseph@HCD <[Joseph.Helo@hcd.ca.gov](mailto:Joseph.Helo@hcd.ca.gov)>  
**Sent:** Wednesday, August 5, 2020 5:00 PM  
**To:** Wayne Nastri <[wnastri@aqmd.gov](mailto:wnastri@aqmd.gov)>  
**Cc:** Waddell, Janice@HCD <[Janice.Waddell@hcd.ca.gov](mailto:Janice.Waddell@hcd.ca.gov)>; Ohman, Amanda@HCD <[Amanda.Ohman@hcd.ca.gov](mailto:Amanda.Ohman@hcd.ca.gov)>; Naramore, Susan@HCD <[Susan.Naramore@hcd.ca.gov](mailto:Susan.Naramore@hcd.ca.gov)>  
**Subject:** Tiered Environmental Review of Single-Family Home Projects in Orange and Los Angeles Counties

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING  
AGENCY GAVIN NEWSOM, Governor

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**DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT**

**DIVISION OF FINANCIAL ASSISTANCE**

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Friday July 31, 2020

Mr. Wayne Nastri  
Air Pollution Control Officer  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 91765  
Transmitted via email: [wnastri@aqmd.gov](mailto:wnastri@aqmd.gov)

Re: Tiered Environmental Review of Single-Family Home  
Projects in Orange and Los Angeles Counties  
2017 Community Development Block Grant Disaster  
Recovery

Dear Mr. Nastri:

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 Orange County, Los Angeles County and 10 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 South Coast Air Quality Management 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 Orange and Los Angeles Counties to document completion of coordination with the South Coast Air Quality Management 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](mailto: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](mailto:Joseph.Helo@hcd.ca.gov).

Sincerely,

<Signed copy of this letter is attached>

Janice L. Waddell  
Branch Chief, Federal Programs

<image004.jpg>

**Joseph Helo** | Disaster Recovery Housing Program Manager  
Division of Financial Assistance  
California Department of Housing and Community Development  
2020 W. El Camino Avenue, Suite 200 | Sacramento, CA 95833  
Phone: 916.263.6693

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