

California Department of Housing and Community Development

Community Development Block Grant – Mitigation Action Plan



June 1, 2020

Public Law 115-123, February 9, 2018 and

Public Law 116-20, June 2019

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I. Executive Summary

In February 2018, the President signed Public Law 115-123 appropriating \$28 billion to the U.S. Department of Housing and Urban Development (HUD) to assist communities impacted by disasters. Of this allocation, the State of California (state) received a total of \$212 million in funding to support recovery and mitigation efforts following the wildfires, flooding, mudflows, and debris flows that occurred in October and December 2017. The funding is tied to Federal Emergency Management (FEMA) Major Disaster Declarations DR-4344 and DR-4353. The California Department of Housing and Community Development (HCD) is the responsible entity for administering disaster recovery funding allocated to the State of California.

HUD approved HCD's 2017 Unmet Recovery Needs Action Plan on March 15, 2019, and HCD signed a grant agreement with HUD to begin drawing down the \$124 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funding in August 2019. This Action Plan covers the \$88 million in Community Development Block Grant Mitigation (CDBG-MIT) funds appropriated in Public Law 115-123, and the document follows requirements outlined in the Federal Register Notice published on August 23, 2019 for CDBG-MIT funding.¹

A. HUD Mitigation Definition

HUD states that CDBG-MIT funds are for different purposes than the Unmet Recovery Needs funding (i.e. CDBG-DR). While CDBG-DR funds focus on addressing unmet needs directly resulting from the disasters, CDBG-MIT funds are intended to be forward looking and programmed in such a way that they increase community resilience, reduce the risk to loss of life, and lessen the impact of future natural disasters. In the Federal Register Notice, HUD defines mitigation as:

“Mitigation activities are those that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.”²

CDBG-MIT blends requirements and objectives between CDBG-DR and FEMA funding sources, including Hazard Mitigation Grant Program (HMGP) funding. HCD currently administers disaster recovery funding, including the CDBG National Disaster Resilience (CDBG-NDR) and the 2017 CDBG-DR Unmet Recovery Needs funding, but to ensure that the CDBG-MIT Action Plan reflects best practices in hazard mitigation, HCD has worked closely and consulted with state and federal partners that work directly on emergency response, hazard mitigation, resilience planning, and fire protection. HCD consulted with the California Department of Forestry and Fire Protection (CAL FIRE), the California Governor's Office of Planning and Research (OPR), the State Hazard Mitigation Officer (SHMO), and California Governor's Office of Emergency Services (Cal OES) throughout the development of the CDBG-MIT Action Plan to ensure the Action Plan leverages existing state mitigation activities and funding sources.

¹Department of Housing and Urban Development. August 2019. Federal Register Notice. 84 FR 45838. Available at: <https://www.govinfo.gov/content/pkg/FR-2019-08-30/pdf/2019-18607.pdf>

² Department of Housing and Urban Development. August 2019. Federal Register Notice. 84 FR 45838. Available at: <https://www.federalregister.gov/d/2019-18607/p-43>

B. Overview of Qualifying Disasters

CDBG-MIT funding differs from traditional CDBG-DR funding in that it does not require a direct tie-back to the qualifying disasters. While there is no direct tie-back requirement, funding must be spent in and to benefit the Most Impacted and Distressed Areas (MID) from FEMA DR-4344 and DR-4353. Furthermore, with \$88 million to support mitigation efforts in both Northern and Southern California, HCD uses the qualifying disasters and mitigation efforts related to the disasters to ensure that mitigation funding is targeted and maximizes current investments to reduce future risks to the MID areas. The qualifying disasters include October 2017 and December 2017 disasters:

- **October 2017 Wildfires (DR-4344)** - The October 2017 fires spanned from the north coast of the San Francisco Bay Area, to the northern Central Valley and Orange County. Fires included the Central Lake-Napa Unit (LNU) Complex (including the Pocket, Tubbs, Nuns, and Atlas fires) in Sonoma and Napa Counties, the Mendocino Lake Complex (including the Redwood Valley and Sulphur fires), and Wind Complex (Cascade and Laporte, Lobo, and McCourtney fires) in the Tri-County region including Butte, Nevada, and Yuba Counties, as well as the Canyon fire in Orange County.
- **December Wildfires, Mudflows, and Debris Flows (DR-4353)** - The December 2017 fires, mudflows, and debris flows impacted counties across Southern California. Fires include the Thomas Fire, impacting Ventura and Santa Barbara Counties, the Rye Fire and Creek Fire in Los Angeles County, and Lilac fire in San Diego. Following the fires, debris, and mudflows severely impacted the footprint of the Thomas Fire, devastating the Montecito area in Santa Barbara County.

C. Ongoing Threat

California's Fourth Climate Change Assessment, conducted in 2018, projected that climate change will make forests more susceptible to extreme wildfires, especially if greenhouse gas emissions continue to rise.³ Anthropogenic, or human factors, such as ignitions, infrastructure, and development at the wildland-urban interface also contribute to the presence and characteristics of wildfires; approximately 85 percent of all fire ignitions in California are the result of human activity, with the rest due to lightning.

This Action Plan covers the DR-4344 and DR-4353 disasters from 2017, but California continues to face extreme fire threat. The current status of California's forest is a deadly combination of drought, buildup of vegetation, dead and dying trees, and unprecedented development in the state's Wildland Urban Interface (WUI). These conditions, as well as extreme wind events, including extended fire seasons, have contributed to the most destructive and deadliest wildfires in the state's history in 2017 and 2018.⁴

California will continue to grapple with severe fire risk due to the backlog in forest management work in both federal lands and state lands, where millions of acres need treatment and

³ Governor's Office of Planning and Research, the State of California Energy Commission and the California Natural Resources Agency. 2018 "California's Fourth Climate Change Assessment". Available at: <http://www.climateassessment.ca.gov/>.

⁴ California Department of Forestry and Fire Protection. 2019. Community Wildfire Prevention & Mitigation Report. Available at: <https://www.fire.ca.gov/media/5584/45-day-report-final.pdf>

maintenance. This Action Plan proposes programs to increase community resilience through planning and infrastructure mitigation efforts with a focus on programs that support low-income and minority communities, vulnerable populations, and Native American tribes, all of whom face elevated risk. In developing this Action Plan, HCD made a concerted effort to engage Native American tribes located in the MID for input specific to their communities. Additional information on those efforts can be found in Appendix A. Better prepared communities, and forest treatments will reduce fire severity, still, climate change will continue to lead to more severe weather events, including extreme winds. While restoring the state's forest health will take decades, the programs proposed in this document will support resilience in communities impacted by DR-4344 and DR-4353, reducing community risk and protecting vulnerable communities.

Since the 2017 disasters, California continues to experience severe weather and fires that threaten communities across the state. The 2018 fire season included FEMA DR-4407 and DR-4382, including the Camp Fire that devastated the City of Paradise and Butte County. Out of this disaster, Governor Gavin Newsom issued an Executive Order to fund projects that immediately protect California's vulnerable populations under state-funded projects. This included projects that protect communities living in poverty, persons with disabilities, persons with limited English proficiency, households with children under five years of age, elderly populations (over the age of 65), and households without a car.⁵ HUD issued a press release on December 3, 2019 announcing nearly \$1 billion in CDBG-DR funding to support recovery from DR-4407 and DR-4382, which will be outlined in a forthcoming Action Plan.⁶ CDBG-DR and CDBG-MIT programming does not follow the same prioritization as the state program and is designed to target unmet or greatest need resulting from the related disasters.

In October 2019, investor owned electric utilities began Public Safety Power Shutoffs (PSPS), de-energizing electric power to reduce wildfire risk due to strong winds and hot weather.⁷ Between October 5, 2019 and November 1, 2019, twelve shut off events took place, impacting 800,000 people across the state.⁸ These sudden shutoffs impacted many communities that experienced disasters in 2017 and 2018, including households across Northern and Southern California, and, as with other disasters, disproportionately impacted the most vulnerable (especially those with home medical equipment, lost wages due to job closures, and food insecurity from lost power).⁹ In response, Governor Newsom launched the PSPS Resiliency Program designed to protect public health, safety, and commerce in impacted areas. The PSPS program includes \$150,000 for each county in California, \$8 million in competitive grants to

⁵ California Department of Forestry and Fire Protection. 2019. Community Wildfire Prevention & Mitigation Report. Available at: <https://www.fire.ca.gov/media/5584/45-day-report-final.pdf>

⁶ U.S. Department of Housing and Urban Development Office of Public Affairs. 2019. "HUD Continues Support For Fifteen States and Four U.S. territories Recovering From Major Disasters." Available at: https://www.hud.gov/press/press_releases_media_advisories/HUD_No_19_173

⁷ California Public Utilities Commission, De-Energization. Available at: <https://www.cpuc.ca.gov/deenergization/>

⁸ Canon, Gabrielle. November 2019. "California launches investigation into public safety power shutoffs by PG&E, other utilities. USA Today. Available at: <https://www.usatoday.com/story/news/politics/2019/11/13/california-launches-probe-into-public-safety-power-shutoffs-pg-e-others/4180480002/>

⁹ Irfan, Umair. October 2019. "PG&E's power shutoff in California shows inequities of climate risks" Vox. Available at: <https://www.vox.com/2019/10/9/20906551/pge-power-shutdown-blackout-fire-bankruptcy>

incorporated cities, and \$1.5 million for tribal governments. These funds are designed to support energy sources for essential facilities and critical infrastructure.

The programs proposed in this Action Plan apply lessons learned from disasters occurring subsequent to 2017 and the assessment outlined in this document builds off existing work by CAL FIRE, Cal OES, and OPR to create data-informed investments, build capacity of local governments, and support local and regional planning to reduce the cost of future disasters.

D. Anticipated Mitigation Needs

HCD will administer the CDBG-MIT funds in accordance with the requirement outlined in the Federal Register Notice. This Action Plan includes the Mitigation Needs Assessment, a review of long-term planning and risk mitigation, how CDBG-MIT funds may be leveraged with other funds, and an overview of proposed method of distribution and programming.

Public and stakeholder engagement is central to the development of the State of California's CDBG-MIT Action Plan and Mitigation Needs Assessment. HCD consulted with impacted counties and municipalities, then conducted two rounds of public meetings across the disaster impacted areas (with a focus on the HUD-designated MID). HCD hosted its first round of public meetings in January 2020 in Mendocino, Sonoma, Yuba, Los Angeles, and Ventura Counties, providing an overview of CDBG-MIT requirements, a summary of initial data and findings from the Mitigation Needs Assessment, and an initial programmatic structure for feedback and public comment. In March 2020, HCD hosted its second round of public meetings in Ventura, Santa Barbara, and Napa Counties. Due to COVID-19, HCD hosted its final two public meetings as webinars for residents of Sonoma, Nevada, Butte, and Yuba counties. The second round of meetings provided an overview of the proposed CDBG-MIT programs and provided an opportunity for stakeholder and public feedback and public comments.

Mitigation programs must prioritize the protection of low-and-moderate income (LMI) persons and fifty percent of CDBG-MIT funds must benefit LMI individuals or households within the MID. Using the qualitative and quantitative data collected, interviews and consultations with state, and federal partners, and consultation with local government entities, HCD proposes the creation of a resilient infrastructure program to support critical infrastructure and reduce risk through funding fire mitigation activities. These activities will prepare local governments, protect low income, vulnerable populations and federally protected classes as identified in 84 FR 45847, and reduce ongoing risk to loss of life and property. Federally protected classes under the Fair Housing Act include race, color, national origin, religion, sex, familial status, and disability. HCD also allocates funding to planning activities, to support resilient planning related to forest management, emergency management, and hazard mitigation. Finally, HCD will allocate funds for public service activities to build local capacity and support community education and outreach related to preparedness and mitigation principles.

II. Mitigation Needs Assessment

A. Introduction

CDBG-MIT funds provide a unique opportunity for California communities impacted by the 2017 FEMA DR-4344 and DR-4353 disasters to fund and implement strategic mitigation activities, minimize disaster risks, and reduce future impacts.

The October 2017 (DR-4344) fires spanned from the north coast of the San Francisco Bay Area, to the northern Central Valley, and Orange County. Fires included the Central Lake-Napa Unit (LNU) Complex (including the Pocket, Tubbs, Nuns, and Atlas fires) in Sonoma and Napa Counties, the Mendocino Lake Complex (including the Redwood Valley and Sulphur fires), and the Wind Complex (Cascade and Laporte, Lobo, and McCourtney fires) in the Tri-County region including Butte, Nevada and Yuba Counties, as well as the Canyon fire in Orange County.

The October 2017 wildfires burned over 200,000 acres combined and destroyed 8,922 structures, with the Central LNU Complex fire responsible for much of the damage. The areas affected sustained approximately \$8.6 billion in property damages and losses, as reported through insurance claims. During and after the disaster, cities and counties responded with services and shelters for those displaced to help begin the process of recovery. However, one year later a survey of households with insurance claims showed 53 percent had not completed the dwelling portion of their claim and 62 percent still planned to rebuild.

The December 2017 fires, mudflows, and debris flows (DR-4353) impacted counties across Southern California. Fires included the Thomas fire, impacting Ventura and Santa Barbara Counties, the Rye and Creek fires in Los Angeles County, and Lilac fire in San Diego. Following the fires, debris, and mudflows severely impacted the footprint of the Thomas fire, devastating the Montecito area in Santa Barbara County.

Across all the Southern California fires, a total of 308,383 acres were burned, with the Thomas fire alone becoming the largest single fire in California history at 281,893 acres burned, until the Mendocino Fire Complex in 2018. The devastation created by the fires was exacerbated by heavy rains that followed, resulting in massive mud and debris flows. Electricity, gas, cellular telephone, internet, drainage, sewer, and water service were all compromised, homes were destroyed, lives were lost, and communities were displaced.

1. Mitigation Funding Background

On February 9, 2018, the President signed Public Law 115-123 that included an appropriation to the U.S. Department of Housing and Urban Development (HUD) of \$28 billion. HUD allocated \$88,000,000 of that appropriation in Community Development Block Grant Mitigation (CDBG-MIT) funds to the State of California for mitigation activities as a result of the 2017 October Wildfires (DR-4344) and December Wildfires, Mudslides, and Debris Flows (DR-4353). HUD provided Federal Register Notice 84 FR 45838¹⁰ (the Notice) as an outline for specific framework in the development of CDBG-MIT programming. The Notice provides definitions of mitigation activities, expenditure requirements, and funding timelines separate from the CDBG-DR allocation provided for the same disaster events. Additionally, the Notice clarifies the close

¹⁰ Department of Housing and Urban Development, August 2019. Federal Register Notice. 84 FR 45838. Available <https://www.govinfo.gov/content/pkg/FR-2019-08-30/pdf/2019-18607.pdf>

relationship between CDBG-MIT funds and FEMA funds (i.e. the Hazard Mitigation Grant Program [HMGP]).

Although Public Law 115-123 tied the allocation to the State of California to wildfire, mudslides, and debris flows, mitigation funds are 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. The MID Local Hazard Mitigation Plans (LHMPs) were also referenced in order to establish a targeted view of how the wildfires, mudslides, and debris flows affected the MID.

- FEMA Local Mitigation Planning Handbook,
- Department of Homeland Security (DHS) Office of Infrastructure Protection,
- National Association of Counties, Improving Lifelines Brief,
- U.S. Forest Service (USFS) wildland fire resources,
- National Interagency Coordination Center for coordinating the mobilization of resources for wildland fire, and
- HUD Community Planning and Development (CPD) Mapping tool.

The foundation of the Mitigation Needs Assessment is the State of California's Hazard Mitigation Plan (SHMP) (including the risks identified in the plan) drafted by the California Governor's Office of Emergency Services (Cal OES). The SHMP is a federally mandated plan that identifies hazards that could potentially affect California and determines actions to reduce the loss of life and property from a disaster across the state. The plan is required to have the following components as mandated by the Disaster Mitigation Act of 2000:¹¹ planning process, risk assessment, mitigation strategies, coordination of local plans, plan maintenance, and plan adoption and assurances.

¹¹ Disaster Mitigation Act of 2000 (Public Law 106-390 October 30, 2000). Available at: <https://www.fema.gov/media-library-data/20130726-1524-20490-1790/dma2000.pdf>

The Mitigation Needs Assessment will therefore consider the California SHMP and LHMPs as they relate to the MID for the October 2017 Wildfires (DR-4344) and December 2017 Wildfires, Mudflows, and Debris Flows (DR-4353). Twelve jurisdictions, including two counties and five zip codes designated Most Impacted and Distressed by HUD, are included in the figure below.

TABLE 1: FEDERALLY DECLARED DISASTER AREAS

DR-4344	DR-4353	Most Impacted and Distressed County	Most Impacted and Distressed Zip Code
Butte County	Los Angeles County	Sonoma County	95470
Lake County	San Diego County	Ventura County	95901
Mendocino County	Santa Barbara County	-	94558
Napa County	Ventura County	-	95422
Nevada County	-	-	93108
Orange County	-	-	-
Sonoma County	-	-	-
Yuba County	-	-	-

SOURCE: FEMA

2. HUD Designated Most Impacted and Distressed Areas

HUD requires that 50 percent of CDBG-MIT funds be spent within the MID. HUD determines the MID using the following factors:¹²

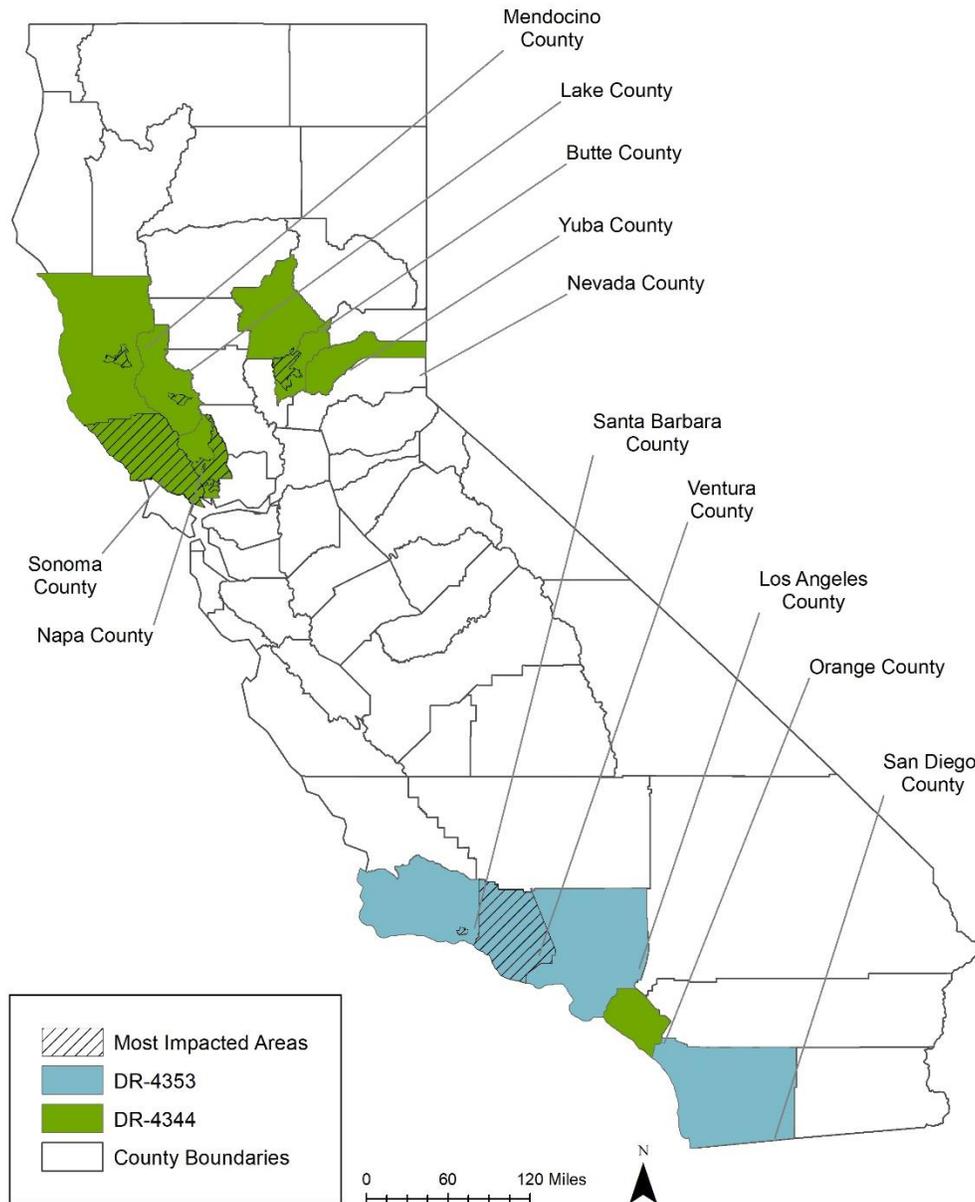
- Areas where FEMA has allocated FEMA Individual Assistance/Individual Household Program, and
- Areas with concentrated damage defined as:
 - Counties exceeding \$10 million in serious unmet housing needs—and most impacted zip codes,
 - Zip codes with \$2 million or more of serious unmet housing needs,
 - Disaster meeting the Most Impacted threshold,
 - One or more county that meets the definition of Most Impacted and Distressed, and
 - An aggregate of Most Impacted zip codes of \$10 million or more.

The following map shows the DR-4344 and DR-4353 impacted counties, the two Most Impacted and Distressed Counties (Sonoma and Ventura) and five Most Impacted and Distressed Zip Codes:

- 95470 – Mendocino County
- 95901 – Predominantly Yuba County
- 94558 – Predominantly Napa County
- 95422 – Predominantly the City of Clearlake in Lake County
- 93108 - City of Montecito, located in Santa Barbara County

¹² U.S Department of Housing and Urban Development, August 2018. Federal Register Notice. 83 FR 40314. Available at: <https://www.gpo.gov/fdsys/pkg/FR-2018-08-14/pdf/2018-17365.pdf>.

FIGURE 1: DECLARED DISASTERS AND MOST IMPACTED AND DISTRESSED AREAS



SOURCE: HUD, ESRI

B. Method

The Mitigation Needs Assessment builds off of existing documents developed by the State of California to address state and local mitigation efforts including: the SHMP, the LHMPs, data collected from county resources (specifically on how the October 2017 Wildfires (DR-4344) and December 2017 Wildfires, Mudflows, and Debris Flows (DR-4353) and subsequent wildfires continue to affect localities), 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-

4344 and DR-4353 impacted areas. 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.

C. State Hazard Mitigation Plan

HUD requires an assessment of the State of California's most recent SHMP to inform the use of the CDBG-MIT funds. The following section provides an overview of the SHMP and examines the state's overall risks. The California Governor's Office of Emergency Management Services (Cal OES) led the development of the FEMA-approved 2018 SHMP pursuant to 44 CFR part 201.4.¹³ The State Hazard Mitigation Team (SHMT), inclusive of 800 members from public, private, local, tribal, state, and federal agencies, and over 300 organizations, drafted the SHMP using analysis and citizen participation processes to identify the state's top concerns. The development of the CDBG-MIT Action Plan was directly informed by the findings of the SHMP and its risk assessment.

In the 2018 SHMP, the arrangement of hazard risk assessments was streamlined by the SHMT to effectively show grouping by hazard type. The 2018 hazard groupings present hazards of similar function together however, earthquakes, floods, and fires are still considered California's primary hazards due to the following:

- Earthquake, flood, and fire hazards have historically caused the greatest human, property, and/or monetary losses, as well as economic, social, and environmental disruptions within the state.
- 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.
- Together, these three hazards have the greatest potential to cause significant losses and disruptions, throughout the State of California.

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 2018 SHMP.¹⁴ For example, earthquake, while still considered a primary hazard, is grouped with related geologic hazards including landslides and volcanoes. Flooding is still considered a primary hazard, but the new flood hazards also include sections on other types of flood hazards, including coastal flooding, tsunami, levee failure, and dam safety. The third primary hazard, fire, includes both wildfire and structural fires. During the most recent SHMP update, the SHMT, made the decision with the Cal OES SHMP Coordinator to update the hazard organization structure using primary hazards, hazard grouping, and related secondary hazards.

¹³ U.S. Government Publishing Office (GPO). Federal Emergency Management Agency, DHS. Available at: <https://www.govinfo.gov/content/pkg/CFR-2011-title44-vol1/pdf/CFR-2011-title44-vol1-sec201-4.pdf>

¹⁴ California Governor's Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan. Page 51. Available at: https://www.caloes.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

TABLE 2: STATE OF CALIFORNIA PRIMARY HAZARD GROUPING

Hazard	Hazard Grouping
Earthquake - Earthquakes represent the most destructive source of hazards, risk, and vulnerability, both in terms of recent state history and the probability of future destruction of greater magnitudes.	<ul style="list-style-type: none"> • Landslide and Other Earth Movement • Volcano
Flood - Floods represent the second most destructive source of hazard, vulnerability, and risk, both in terms of recent state history and the probability of future destruction at greater magnitudes than previously recorded.	<ul style="list-style-type: none"> • Riverine, Stream and Alluvial Flood • Sea-Level Rise, Coastal Flooding, and Erosion • Tsunami and Seiche • Levee Failure and Safety • Dam Failure and Safety
Fire - California is recognized as one of the most fire-prone natural landscapes in the world.	<ul style="list-style-type: none"> • Wildfire • Urban Structural Fires

Source: CA SHMP Section 1.2 - page 8

D. Primary Hazard Rankings by DR-4344 and DR-4353 Impacted Counties

The relative rank of the three main hazards as derived from review of California-approved LHMPs as of May 2017 is shown in Figures 4 and 5. All counties have risk for the primary hazards of flood, fire, and earthquake, as these hazards are neither localized nor limited to any one region and have large area impact when they do occur. Counties with proximity to major fault lines or that contain areas with large amounts of biomass will have one or more of the primary hazards with a high ranking. In Figure 4, Butte County has a high ranking for flood and fire risks because its geography includes the Sacramento River as well as large forested areas. Butte County also contains a minor active fault line that covers a small area, but it is not as likely to cause the same amount of damage as a fire or flood, thus dropping the relative ranking for earthquake to moderate. Figure 5 lists the higher ranked primary hazards by county, demonstrating that these are also not localized hazards. For example, an earthquake that impacts Los Angeles and Ventura counties, will also affect Orange county. A fire burning in Sonoma may spread and impact parts of Napa or Mendocino counties as well. ¹⁵

¹⁵ At the time of the 2018 SHMP, the “no data” counties had no reported data available for inclusion.

TABLE 3: PRIMARY HAZARD RANKING, BY DR-4344 AND DR-4353 IMPACTED COUNTIES¹⁶

County	Ranking	Hazard
Butte	High	Flood Fire
Butte	Moderate to Low	Earthquake
Lake	High	Earthquake Flood Fire
Los Angeles	High	Earthquake Flood Fire
Mendocino	High	Earthquake
Mendocino	Moderate to Low	Flood Fire
Napa	High	Fire
Napa	Moderate to Low	Earthquake Flood
Nevada	High	Earthquake Flood Fire
Nevada	Moderate to Low	N/A
Orange	High	Flood Fire
Orange	Moderate to Low	Earthquake
San Diego	High	*no data as of May 2017
San Diego	Moderate to Low	*no data as of May 2017
Santa Barbara	High	*no data as of May 2017
Santa Barbara	Moderate to Low	*no data as of May 2017
Sonoma	High	Earthquake Flood Fire
Ventura	High	Earthquake Flood Fire
Yuba	High	Flood
Yuba	Moderate to Low	Earthquake Fire

¹⁶ California Governor's Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan. At the time of the 2018 SHMP, the "no data" counties had no reported data available for inclusion.

TABLE 4: DR-4344 AND DR-4353 IMPACTED COUNTIES BY STATE OF CALIFORNIA PRIMARY HAZARDS

Hazard	Ranking	Counties
Earthquake	High	Mendocino Sonoma Lake Nevada Ventura Los Angeles
Earthquake	Moderate to Low	Butte Yuba Napa Orange
Earthquake	*No Data as of May 2017	Santa Barbara San Diego
Flood	High	Sonoma Lake Butte Yuba Nevada Los Angeles Ventura Orange
Flood	Moderate to Low	Napa Mendocino
Flood	*No Data as of May 2017	San Diego Santa Barbara
Fire	High	Sonoma Lake Napa Butte Ventura Los Angeles Orange Nevada
Fire	Moderate to Low	Mendocino Yuba
Fire	*No Data as of May 2017	Santa Barbara San Diego

In addition to the three primary hazards, the 2018 SHMP identifies other hazards of concern that impact various regions of the State of California. These other hazards typically are characterized by more isolated, localized, and/or infrequent disaster incidents. The figure below groups secondary hazards into three broad categories with two of the three being human-caused rather than natural disasters.

TABLE 5: STATE OF CALIFORNIA OTHER HAZARDS OF CONCERN

Other Hazards Category Name	Secondary Hazards
Other Climate and Weather-Influenced Hazards	<ul style="list-style-type: none"> • Agricultural and Silvicultural Pests and Diseases • Air Pollution • Aquatic Invasive Species • Avalanches • Drought and Water Shortages • Energy Shortage and Energy Resiliency • Epidemic/Pandemic/Vector Borne Disease • Extreme Heat • Freeze • Severe Weather and Storms • Tree Mortality
Sociotechnical/Technological Hazards	<ul style="list-style-type: none"> • Hazardous Material Release • Oil Spills • Natural Gas Pipeline Hazards • Radiological Accidents • Train Accidents Resulting in Explosions and/or Toxic Releases • Well Stimulation and Hydraulic Fracturing Hazards
Threat and Disturbance Hazards	<ul style="list-style-type: none"> • Terrorism • Cyber Threats • Civil Disorder in California

The 2018 SHMP thoroughly categorizes each identified hazard, inclusive of a description, extent, location, hazard history, changing future conditions, impact, future probability, and emergency operation plan. This Action Plan’s Mitigation Needs Assessment does not reference all sections of the SHMP, but the full final plan is available at: https://www.CalOES.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf#page=305&zoom=100,0,226.

The State of California has a total of 451 jurisdictions with adopted and FEMA-approved LHMPs. Cal OES Hazard Mitigation Planning staff administers the LHMP program for the state. The DR-4353 and DR-4344 impacted jurisdictions account for 13 of the 451 LHMPs. The figure below provides information about the approval and expiration dates for LHMPs.

TABLE 6: LHMPs YEAR APPROVED AND YEAR EXPIRED

Plan	Plan Approved	Plan Expiration
Butte County Local Hazard Mitigation Plan Update	Submitted to Cal OES 2019	2024
Lake County Hazard Mitigation Plan Update	June 26, 2018	2023
City of Clearlake Local Hazard Mitigation Plan Update	June 2019	2024
Los Angeles County All-Hazard Mitigation Plan	Update on-going	2019
Mendocino County Multi-Hazard Mitigation Plan	May 2014	2019
Napa County Operational Area Hazard Mitigation Plan Update	2013	2018
Nevada County Local Hazard Mitigation Plan Update	2017	2022
Orange County Local Hazard Mitigation Plan Update	2015	2020
San Diego County Multi-Jurisdictional Hazard Mitigation Plan Update	2018	2023
Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan Update	2017	2022
Sonoma County Hazard Mitigation Plan Update	2016	2021
Ventura County Multi-Hazard Mitigation Plan Update	2015	2020
Yuba County Multi-Jurisdictional Local Hazard Mitigation Plan Update	2015	2020

E. California’s Primary Hazards: Risks and Mitigation

The previous section described the State of California’s primary hazards, this section examines the risks and mitigation activities identified in the SHMP. Flooding and fire occur the most often. Most recently fire has emerged as an annual threat roughly comparable to floods. Earthquakes, on the other hand, have a lower frequency but can result in extreme disaster events and therefore remain California’s top primary hazard.¹⁷ A review of the risks imposed by each primary hazard related to the MID informed the Mitigation Needs Assessment and provided focus for proposing mitigation activities.

¹⁷ California Governor’s Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan. Page 507. Available at: https://www.caloes.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

1. Earthquakes and Geologic Hazards

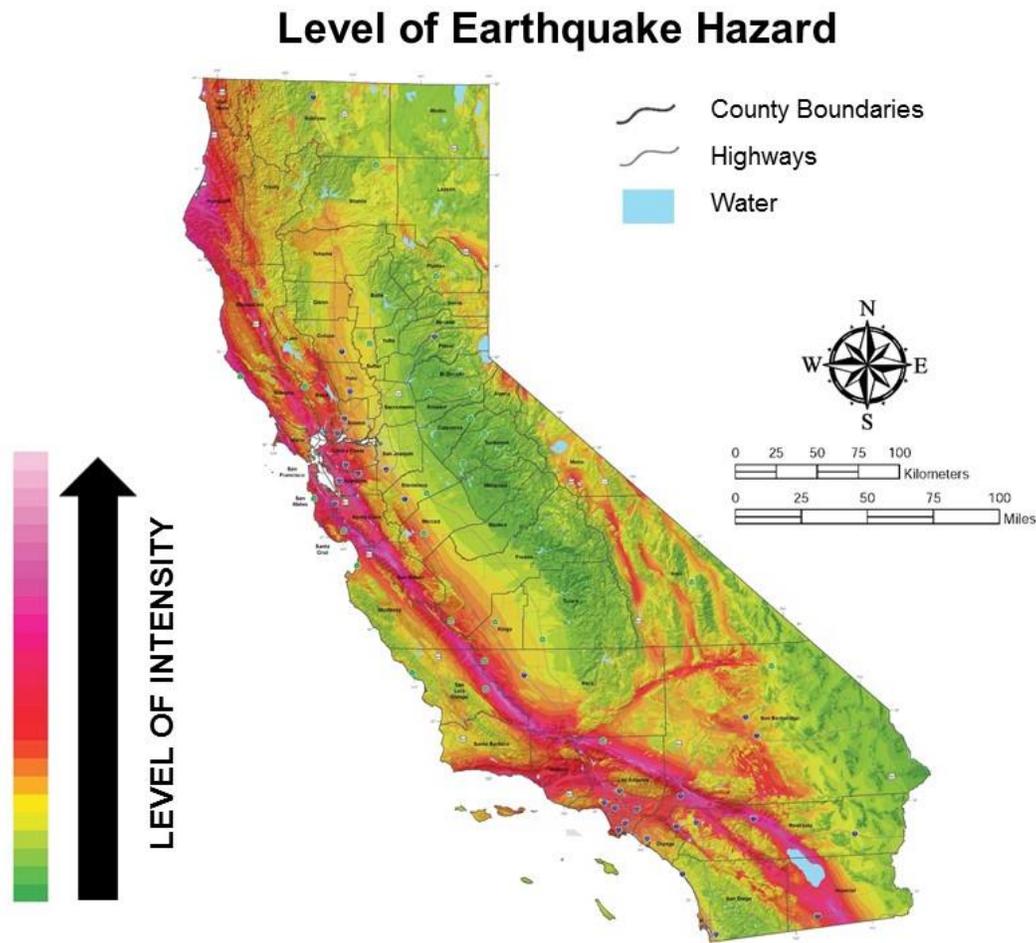
Earthquakes represent the most destructive hazard, both in terms of recent state history and the probability of future destruction, inclusive of risk and vulnerability. In the disaster-impacted counties, earthquakes are identified as a high hazard for six counties, and four counties have identified earthquakes as a moderate to low hazard.

a) Probability of Seismic Hazards Statewide

Based on the most recent earthquake forecast model for California, the United States Geological Survey (USGS) and other scientists estimate a 72 percent probability that at least one earthquake of magnitude 6.7 or greater, capable of causing widespread damage, will strike the San Francisco Bay Area before 2044. For the Los Angeles region, the same model forecasts a 60 percent probability that an earthquake of magnitude 6.7 or greater will occur before 2044.

The figure below demonstrates the risks of impacts and damages from earthquake shaking throughout California. The more intense estimates follow the major fault lines in the state, such as the San Andreas, showing which counties are most at risk for building and infrastructure damage from intense shaking.

FIGURE 2: EARTHQUAKE SHAKING HAZARD AFFECTING BUILDINGS

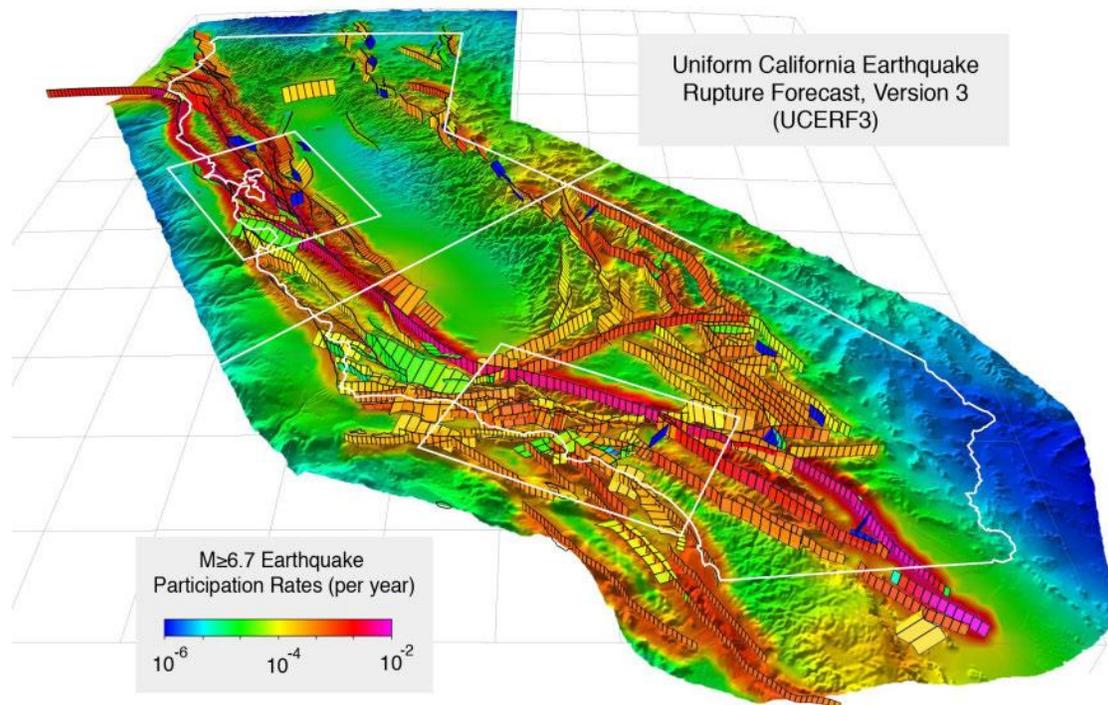


SOURCE: BRANUM, D., R. CHEN, M. PETERSEN AND C. WILLS. 2016. EARTHQUAKE SHAKING POTENTIAL FOR CALIFORNIA. CALIFORNIA GEOLOGICAL SURVEY, UNITED STATE GEOLOGICAL SURVEY. AVAILABLE AT [HTTPS://WWW.CONSERVATION.CA.GOV/CGS/DOCUMENTS/MS_048.PDF](https://www.conservation.ca.gov/cgs/Documents/MS_048.pdf)

The figure below, from the USGS Open File Report 2013-1165, shows the likelihood of an intense earthquake (6.7 magnitude or greater) across fault lines within the state.

These two figures show the significance of earthquake risks and impacts to regions in California and the need for preparation and mitigation efforts to reduce the high probability of property and infrastructure damage during the next large earthquake or series of tremors.

FIGURE 3: PROBABILITY OF EARTHQUAKE MAGNITUDE 6.7 OR GREATER OCCURRING IN 30 YEARS, BY REGION



SOURCE: FIELD, EDWARD H., GLENN BIASI, PETER BIRD, ET AL. 2013. UNIFORM CALIFORNIA EARTHQUAKE RUPTURE FORECAST VERSION 3 – THE TIME-INDEPENDENT MODEL. U.S. DEPARTMENT OF INTERIOR AND U.S. GEOLOGICAL SOCIETY. AVAILABLE AT: [HTTPS://PUBS.USGS.GOV/OF/2013/1165/PDF/OFR2013-1165.PDF](https://pubs.usgs.gov/of/2013/1165/pdf/ofr2013-1165.pdf)

2. Flood Hazards

Flood hazards are among California's three primary hazards and include riverine, stream, alluvial flooding, coastal flooding, erosion, and sea level rise. All flood hazards vary depending upon climate and weather. Levee and dam failure are identified as related secondary hazards, as they may be triggered by primary hazard events or by flooding and inundation resulting from flood generated tsunamis.

California's flood risk seriously impacts its economy and environmental resources and poses a severe threat of loss of life. The SHMP includes the following flood impacts for California:

- Critical infrastructure being damaged and offline for long periods
- Closure or disruption of vital services
- Loss of jobs due to businesses closing
- Water supply and quality being affected
- Vulnerable communities being displaced
- Natural Resources and public access being damaged

California has a robust system of flood infrastructure comprised of about 20,000 miles of levees, more than 1,500 dams and reservoirs, and over 1,000 debris basins. Still, the SHMP emphasizes that flooding is a significant concern within the state for several reasons:

- California has a long and destructive flood history,
- Through the FEMA Flood Insurance Rate Maps (FIRMs) the state has widespread flood vulnerability, specifically identifying flood hazard zones in populated areas, and
- Most local governments have flagged flooding as a critical hazard in their FEMA-approved LHMPs.

The State of California has 10 hydrologic regions, or water resource regions, that present various flood mitigation challenges. They are:

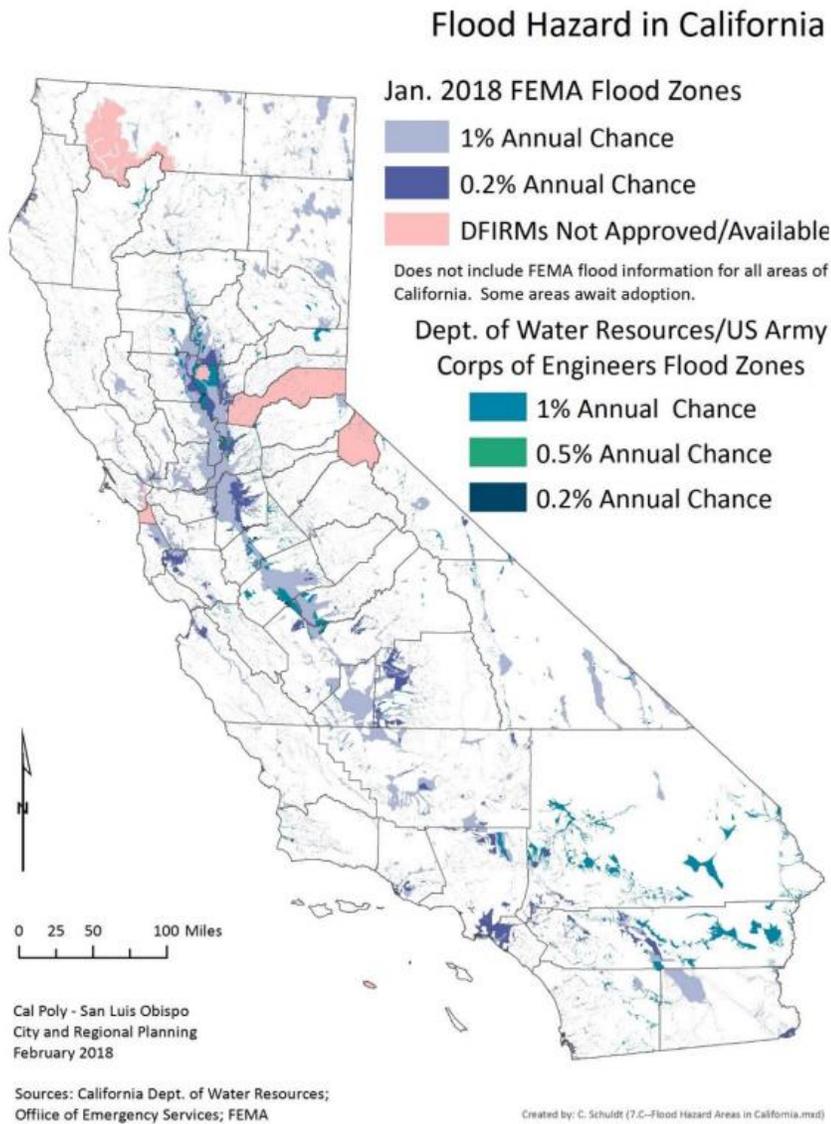
- North Coast Hydrologic Region
- San Francisco Bay Hydrologic Region
- Central Coast Hydrologic Region
- South Coast Hydrologic Region
- Sacramento River Hydrologic Region
- San Joaquin River Hydrologic Region
- Tulare Lake Hydrologic Region
- North Lahontan Hydrologic Region
- South Lahontan Hydrologic Region
- Colorado River Hydrologic Region

a) 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 five 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.

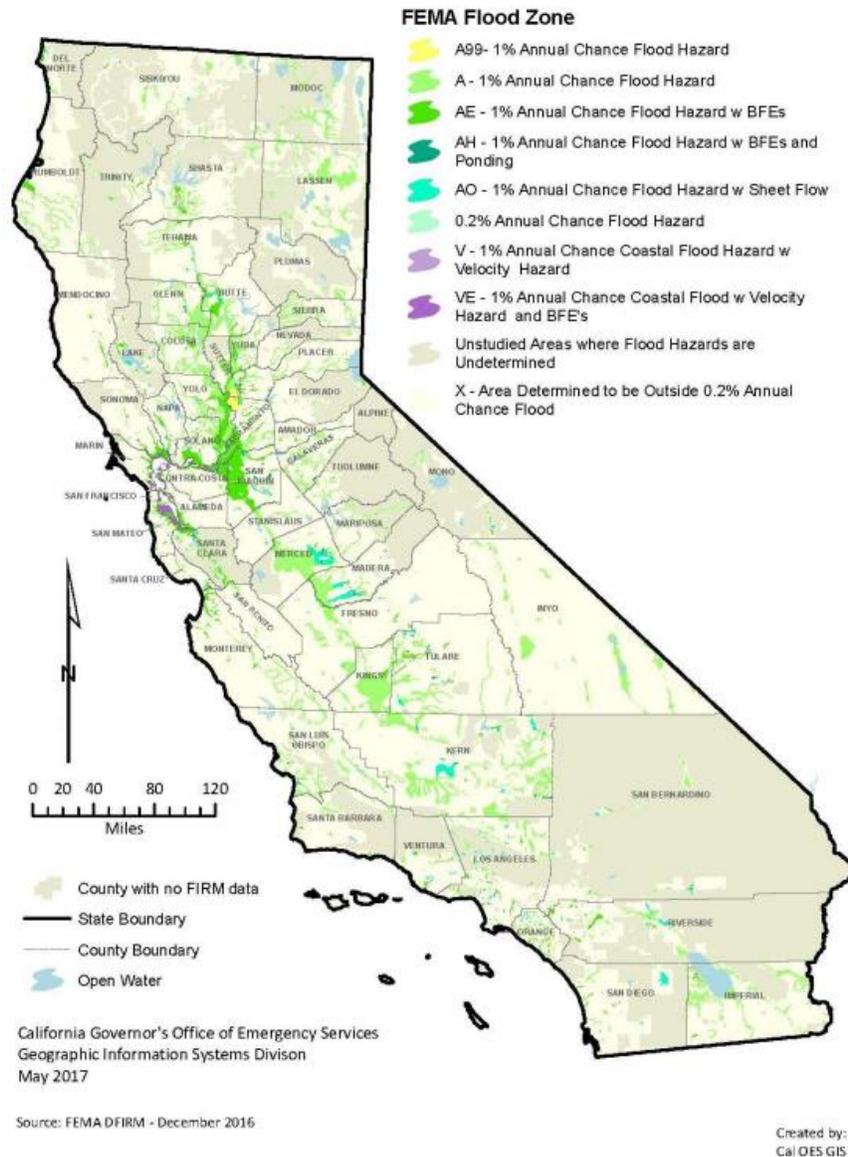
FIGURE 4: FLOOD HAZARDS IN CALIFORNIA



SOURCE: 2018 CALIFORNIA STATE HAZARD MITIGATION PLAN, SECTION 7.1, PAGE 383

FIGURE 5: FEMA FLOOD INSURANCE RATE MAP

Federal Emergency Management Agency (FEMA)
 Flood Insurance Rate Map (FIRM)



SOURCE: 2018 CALIFORNIA STATE HAZARD MITIGATION PLAN, SECTION 7.1, PAGE 386

b) 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 can reduce the ability of a landscape to retain rainfall, which often leads to flooding and mudflows.

3. Wildfire Hazards

Wildfire hazards represents the third of California's three primary hazards, and the most prominent cause of damage and recovery efforts in recent years. In 2017 there were two significant national disaster declarations for wildfires: DR-4344 and DR-4353, which took place across Northern and Southern California over a span of approximately three months. DR-4344 burned over 200,000 acres, destroying an estimated 7,050 parcels and 8,922 structures. Additionally, 41 lives were lost in the Central LNU Complex fire in Napa and Sonoma Counties. DR-4353 burned over 300,000 acres in Southern California and destroyed over 1,000 residences. The fires also impacted electricity, gas, cellular telephone, internet, drainage, sewer, and water services.¹⁸ The damages caused by DR-4344 and DR-4353 were directly related to California's growing wildfire risk. Wildfire, and particularly wildland-urban interface (WUI) fire, has historically resulted in significant hazard impacts and has a high probability of future destruction of greater magnitudes than previously recorded. As a result, this Action Plan will identify wildfire mitigation activities to reduce the severity and impacts of future wildfire in the State of California.

a) Probability of Fire Hazards Statewide

The State of California is experiencing a heightened risk of fire danger due to the five-year state-wide drought (2012-2017), tree mortality, and an increase of severe weather events.

Starting in 2013, Governor Edmund G. Brown Jr. declared a State of Emergency to take precaution against severe drought conditions across the state. Drought severely impacts the health of California's forests. In December 2017, the U.S. Forest Service (USFS) and CAL FIRE announced that a total of 129 million trees died due to drought and bark beetles across 8,900,000 acres of the state. The ongoing drought conditions inhibited tree recovery, making forests vulnerable to bark beetles and increasing the wildfire risk for California communities. Although, following substantial winter storms, Governor Brown lifted the Drought State of Emergency in April 2017, the number of dead trees remains an ongoing threat.

The SHMP identifies flammable expanses of brush, diseased timberland, overstocked forests, hot and dry summers, extreme topography, intense fire weather and wind events, summer lighting storms, and human acts as main culprits of California's wildfire threat. Destructive fire events in 2015, 2016, and 2017 including the Tubbs Fire in Santa Rosa, and the intense 2018 and 2019 wildfires, have cemented the need to implement robust mitigation efforts.

Effective management of human/wildfire interface areas necessitates focused long-term, system-wide, mitigation measures, which include:¹⁹

- An educated general public that makes informed decisions related to wildfire protection,
- Land use policies that protect life, property, and natural resources,
- Building and fire codes that decrease the likelihood of structural ignitions and flame contact from WUI fire areas, reducing the ability of fire to spread to structures
- Construction and property standards that enforce defensible space,

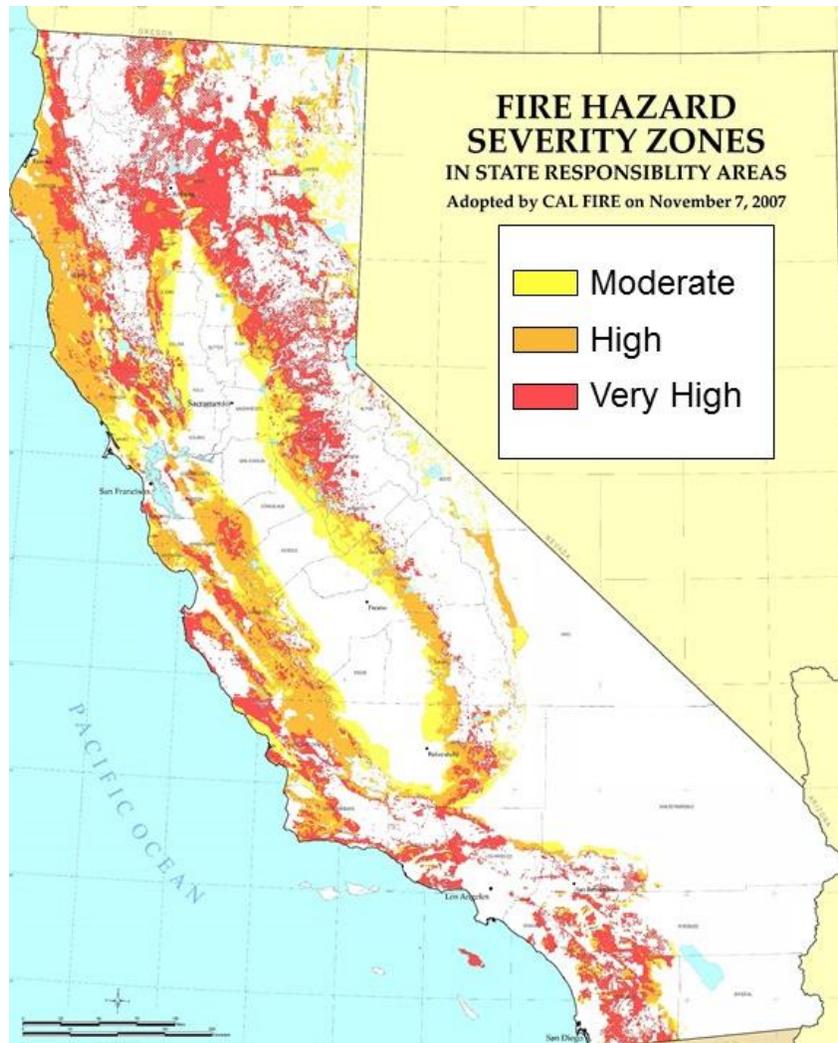
¹⁸ U.S. Department of Housing and Community Development. State of California 2018 CDBG-DR Action Plan, Pages 12-13.

¹⁹ California Governor's Office of Emergency Services. September 2018. California State Hazard Mitigation Plan. Page 540. Available at: https://www.caloes.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

- Forest management commitments to manage towards more natural forest conditions,
- Regulatory mechanisms permitting aggressive hazardous fuel management programming, and
- Effective wildfire suppression programs.

CAL FIRE and the Office of the State Fire Marshal produce maps to show areas with significant fire hazards based on local fuels, terrain, weather, and other factors. These maps impact requirements for clearance and property development standards and new construction, as well as influence risk determinations on properties that are within Fire Hazard Severity Zones. Maps also include State Responsibility Areas that CAL FIRE oversees, and give a hazard score of moderate, high, and very-high based on a number of factors that influence fire likelihood and fire behavior (i.e. fire history, fuel levels, terrain, and weather). Figure 11 shows the most recent Fire Hazard Severity Zones for state responsibility areas.

FIGURE 6: FIRE HAZARD SEVERITY ZONES IN STATE RESPONSIBILITY AREAS



SOURCE: STATE OF CALIFORNIA AND THE DEPARTMENT OF FORESTRY AND FIRE PROTECTION, 2007,
[HTTPS://OSFM.FIRE.CA.GOV/MEDIA/6636/FHSZS_MAP.PDF](https://osfm.fire.ca.gov/media/6636/fhszs_map.pdf)

c) Wildfire Threat Areas

According to the 2018 SHMP, fire threat is a combination of two factors, fire frequency, or likelihood of a given area burning and potential fire behavior. The map below highlights the extent of high, very high, and extreme wildfire threat areas across the state including DR-4344 and DR-4353 impacted areas. The map also overwhelmingly establishes that the south western counties (particularly Santa Barbara, Ventura, Los Angeles, and Orange counties) have large concentrations of either very high or extreme wildfire threat areas.

FIGURE 7: WILDFIRE THREAT AREAS²⁰



SOURCE: CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION, FIRE AND RESOURCE ASSESSMENT PROGRAM, FIRE THREAT. 2019. AVAILABLE AT [HTTPS://FRAP.FIRE.CA.GOV/MEDIA/10315/FIRETHREAT_19_ADA.PDF](https://frap.fire.ca.gov/media/10315/firethreat_19_ada.pdf)

²⁰ “Fire threat provides a measure of fuel conditions and fire potential in the ecosystem, representing the relative likelihood of “damaging” or difficult to control wildfire occurring for a given area. Fire Threat is not a risk assessment by itself, but can be used to assess the potential for impacts on various assets and values susceptible to fire. Impacts are more likely to occur and/or be of increased severity for the higher threat classes. Fire threat is a combination of two factors: 1) fire probability, or the likelihood of a given area burning, and 2) potential fire behavior (hazard). These two factors are combined to create 5 threat classes ranging

d) Climate Change and Wildfire Hazard

Climate change alters wildfire hazards in frequency, size, and severity often beyond the historic range, by increasing the length of the fire season, creating drier fuels, decreasing forest health, and altering ignition patterns. Climate change is a driver of increased wildfire severity, and the greatest impacts can be seen in the mixed conifer forest of the Sierra Nevada and throughout Northern California. On the other hand, human-caused ignitions are often the cause of increased fire in the chaparral shrub lands of Southern California. However, the impacts to weather and seasonal patterns have changed the frequency and behavior of wildfires so that CAL FIRE is currently updating the Fire Hazard Severity Zone maps, which will be released during 2020.

Wildland fire also has secondary impacts, in the form of air pollution and soil erosion resulting in increased siltation in streams and lakes, or mudslides. Areas decimated by fire experience increases in runoff during rain storms when vegetation is no longer available to help soil absorb water leaving the top soil loose. This can lead to mudslides in the immediate area, and rivers and lakes that capture water runoff collect experience increased levels of soil and debris as everything washes downstream. Winds that feed fires also carry ash and smoke over large areas of the state, often creating hazardous breathing conditions that can aggravate respiratory conditions or be dangerous with prolonged exposure. Concerned about the unhealthy air quality caused by smoke blowing west from the Camp Fire in 2018, public schools in Alameda, Contra Costa, Marin, Napa, San Francisco, and Solano counties closed.²¹

4. Climate Change

Climate change is related to changes in climatological conditions that result from increased greenhouse gas (GHG) concentrations in the atmosphere which are linked to an increase in average global temperature. According to the National Oceanic and Atmospheric Administration (NOAA) Earth System Research Laboratory Trends in Atmospheric Carbon Dioxide, monthly GHG levels now exceed 400 parts per million (ppm) for the first time in recorded history. Increased GHG emissions and global average temperature result in changes to the global climate shifts in seasonal temperature patterns, changes in precipitation amount, timing and location, sea-level rise, ocean acidification due to increased carbon dioxide (CO₂) absorption, altered wind and storm event frequency, severity, and location. These climatological changes result in prolonged drought, increased coastal flooding and erosion, tree mortality, increase in average temperatures (more extreme heat days, fewer cold nights), shifts in the water cycle with less annual snow fall, and more snowmelt and rainwater running off sooner in the year. As a result, California continues to experience increased extreme weather events and hazards, most recent examples being heat waves, wildfires, droughts, and floods.

from low to extreme. This version (fthrt14_2) is an update created from fthrt14_1 (created for the FRAP 2017 Forest and Rangeland Assessment). Fire Rotation data in fthrt14_1 was replaced with Annual Fire Probability data." California Department of Forestry and Fire Protection. 2019. Available at HTTPS://FRAP.FIRE.CA.GOV/MEDIA/10315/FIRETHREAT_19_ADA.PDF

²¹ Levi, Ryan and Rancaño, Vanessa. November 2018. "To Close or Not to Close For Bad Air? No Easy Answer For Bay Area Schools" KQED News. Available at: <https://www.kqed.org/news/11706988/to-close-or-not-to-close-for-bad-air-no-easy-answer-for-bay-area-schools>

Impacts from climate change are considered secondary hazards in the Mitigation Needs Assessment. Extreme temperatures and increased or decreased precipitation create the conditions for more intense fires, flooding, and landslides. These weather events have the potential to cause injuries or fatalities, environmental damage, property damage, infrastructure damage, and interruption of operations. Examples of specific types of impacts include softening of asphalt roads and warping of railroad rails, damage to roads, flooding of roadways, rail routes, and airports from extreme events, and interruptions to flight plans due to severe weather.

As a result of the increase in climate augmented extreme weather events and hazards, California Executive Order S-03-05 created the California Climate Change Assessment Program. The program executes scientific assessments on the potential impacts of climate change in California and reports potential climate adaptation responses.

The first assessment was completed and released in 2006 and concentrated on the effects of climate change on critical state resources including water supply, public health, agriculture, coastal areas, forestry, and electricity production/demand. The second assessment, released in 2009, provides estimates of the economic impacts of climate change on the state. The third assessment released in 2012 came as a result of requests for more information regarding vulnerability and adaptation options discussed in the 2009 California Adaptation Strategy. The fourth and most recent assessment is tied to California's comprehensive strategy to act on cutting edge climate research. The fourth assessment seeks to provide improved vulnerability assessments based on more in-depth understandings of projected weather extremes, and reports on scientific results that can support action, especially if greenhouse gas emissions continue to rise.²²

The state must prepare for a changing climate and increased threat of frequent and extreme weather events. Verisk Analytics gauged the risk to residential properties in California and found "more than 2,000,000 homes – about 15 percent of all housing units in the state – have a high to extreme risk of wildfire damage. In seven counties, mostly in Northern California, more than two-thirds of all homes were in jeopardy."²³

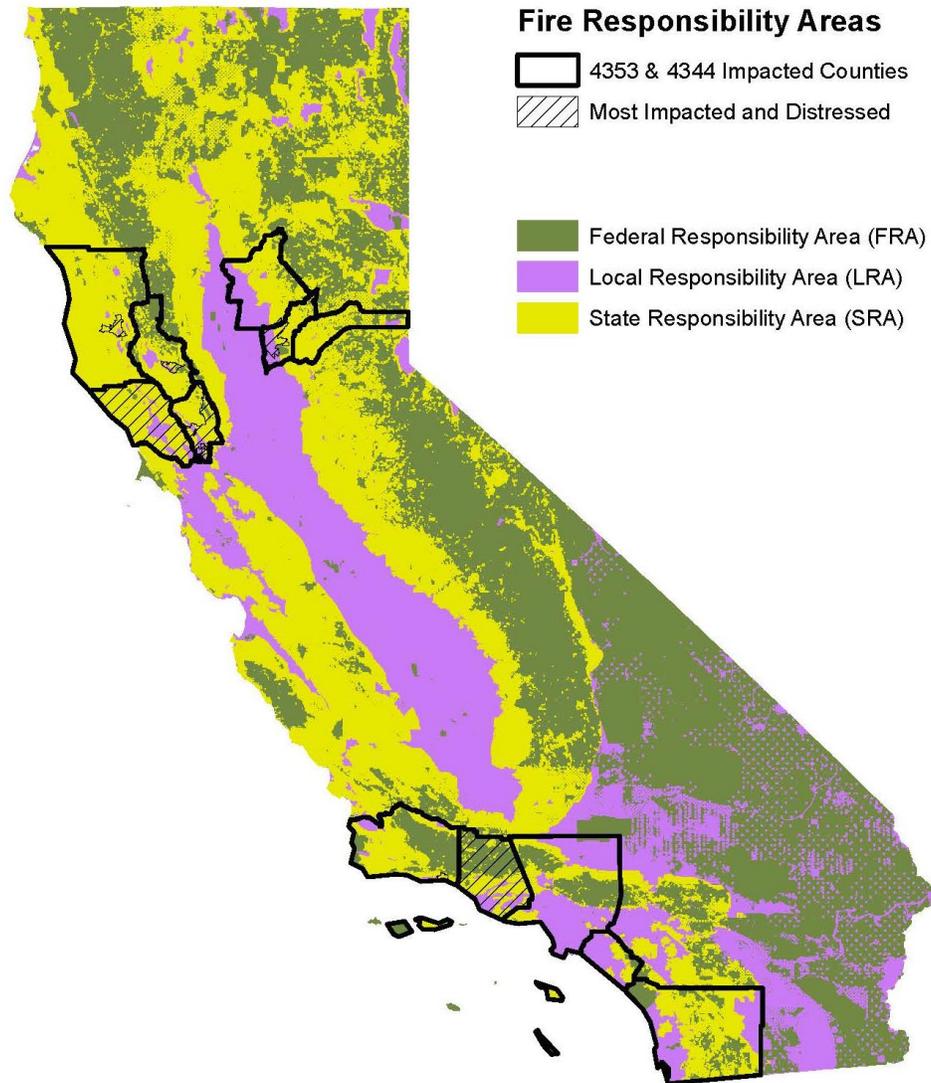
²² Governor's Office of Planning and Research, the State of California Energy Commission and the California Natural Resources Agency, "California's Fourth Climate Change Assessment". Available at: <http://www.climateassessment.ca.gov/>.

²³ Finch II, Michael, August 2018. "These California counties have the highest concentration of homes vulnerable to wildfire." Sacramento Bee. Available at: <https://www.sacbee.com/news/state/california/fires/article216076320.html>.

F. California Responsibility Areas

In California there are Local Responsibility Areas (LRA), Federal Responsibility Areas (FRA), and State Responsibility Areas (SRA), which are defined by legal and congressional jurisdictional boundaries. The figure below shows all three Responsibility Areas in the State of California by color coding. Within the responsibility areas are different agencies and organizations charged with the task of protecting and defending designated areas.²⁴

FIGURE 8 CALIFORNIA STATE RESPONSIBILITY AREAS



SOURCE: CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION, 2017

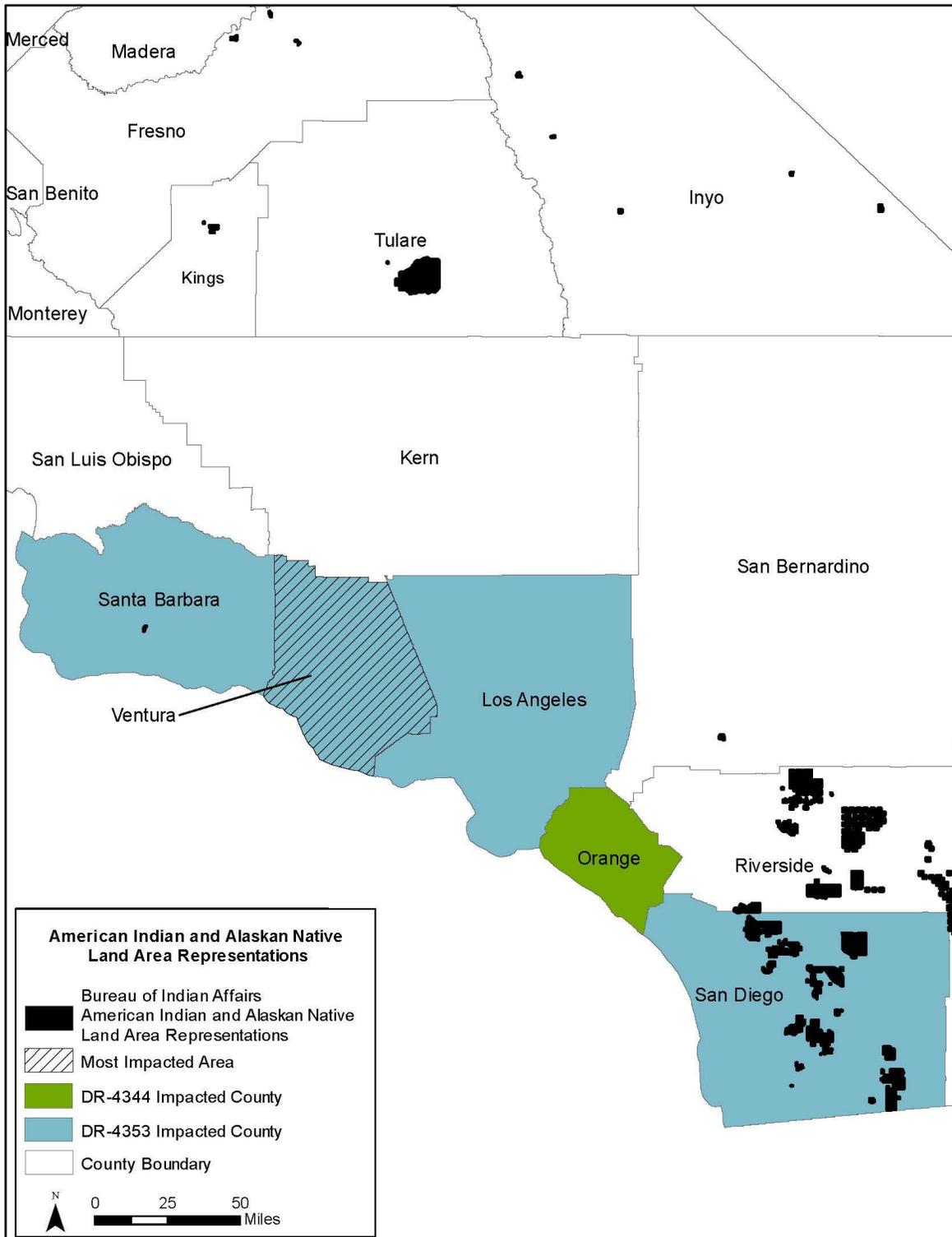
²⁴ Artley, Donald K. August 2009. Wildland Fire Protection and Response in the United States, The Responsibilities, Authorities, and Roles of Federal, State, Local, and Tribal Government, The International Association of Fire Chiefs (IAFC). Available at: https://www.forestsandrangelands.gov/documents/strategy/foundational/wildlandfire_protectresponse_us_20090820.pdf

The organizations include:

- *United States Forest Service (USFS)* - The mission of the USFS is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. In meeting its mission, the USFS manages and provides wildland fire protection on 18 national forests in California covering almost 21 million acres.
- *The Bureau of Land Management (BLM)* - The mission of the BLM is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. In meeting its mission, the BLM manages and protects over 15 million acres in California and provides wildland fire protection on almost 14 million acres.
- *The National Park Service (NPS)* - The mission of the NPS is to preserve the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. In meeting its mission, the NPS manages over 7.5 million acres in California.
- *U.S Fish and Wildlife Service* - The U.S. Fish and Wildlife Service, working with others, is responsible for conserving, protecting, and enhancing fish and wildlife and their habitats for the continuing benefit of the American people through federal programs relating to migratory birds, endangered species, interjurisdictional fish and marine mammals, and inland sport fisheries. In meeting its mission, the FWS is responsible for managing 34 National Wildlife Refuges in California, covering about 465,000 acres.
- *California Department of Forestry and Fire Protection (CAL FIRE)*- CAL FIRE is responsible for the wildland fire protection system in the state. The Board of Forestry has the authority to determine State Responsibility Areas (SRA) for private lands. These are lands for which CAL FIRE has wildland fire protection responsibility. All non-federal lands not assigned to an SRA are by default LRA. As a result, wildfire protection in California (approximately 90 million acres) is divided almost equally among CAL FIRE, local government, and the federal government.
- *The Bureau of Indian Affairs and Tribal Government (BIA)*- The Bureau of Indian Affairs' mission is to enhance the quality of life, to promote economic opportunity, and to carry out the responsibility to protect and improve the trust assets of American Indians, Indian tribes and Alaska Natives. The BIA is responsible for wildland fire protection on the other 103 reservation and rancherias. The BIA provides protection for tribal trust lands in northern California, but contracts with CAL FIRE for the protection of scattered tribal trust lands in southern California. The following maps show the BIA recognized tribal governments in Northern and Southern California.

FIGURE 9: BIA LAND AREA REPRESENTATIONS – NORTHERN CALIFORNIA

FIGURE 10: BIA LAND AREA REPRESENTATIONS – SOUTHERN CALIFORNIA



SOURCE: U.S. DEPARTMENT OF THE INTERIOR INDIAN AFFAIRS,
[HTTPS://BIAMAPS.DOI.GOV/BOGS/DATADOWNLOAD.HTML](https://BIAMAPS.DOI.GOV/BOGS/DATADOWNLOAD.HTML)

G. Local Hazard Mitigation Plan

The LHMPs for the MID provide critical hazard and risk information as well as actionable and localized mitigation approaches identified by its authors. The figure below pulled the most common hazards from the LHMPs. The most frequently identified hazards were wildfires, floods, and earthquakes. The hazard table reinforces the SHMP's hazard prioritization and reiterates the need for wildfire mitigation to be a primary focus for mitigation approaches. 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 wildfires and, where applicable, flooding. After wildfires, flooding, and earthquakes, climate change is the next most commonly identified top hazard and an important consideration when planning future mitigation activities. The unpredictability of climate change will inevitably expand the reach of hazards in areas that have not previously experienced wildfires or flooding events.

TABLE 7: LOCAL HAZARD MITIGATION PLANS TOP HAZARDS

Hazard Mitigation Plans	Butte - 2019	Lake - 2018	City of Clearlake - 2019	Los Angeles - 2019	Mendocino - 2014	Napa - 2013	Nevada - 2017	Orange - 2015	San Diego - 2017	Santa Barbara - 2017	Sonoma - 2017	Ventura - 2015	Yuba - 2007
Agricultural Pest/Invasive species	-	x	x	-	-	-	x	-	-	-	-	-	-
Dam Failure	x	-	-	-	-	-	-	-	-	-	-	-	-
Climate Change	x	x	-	x	-	-	-	-	-	x	x	x	-
Earthquake	-	-	-	x	x	x	x	x	x	x	x	x	x
Flood	x	-	-	-	x	x	x	x	x	x	x	x	x
Hazardous Materials Release	-	-	-	-	x	-	-	-	x	-	-	-	-
Landslides	-	-	-	x	-	-	-	-	-	-	x	x	-
Severe Weather or Storms	x	-	-	-	-	-	x	-	-	-	-	-	x
Tsunami	-	-	-	-	-	x	-	x	-	-	-	-	-
Wildfire	x	x	-	x	x	x	x	x	x	x	x	x	x
Other Human- Caused Hazard	-	-	-	-	-	-	-	-	x	-	-	-	-

H. Primary Risks and Exposure Identified in LHMPs

Many LHMPs identify the risks presented for structures, people, and critical facilities, and quantify the potential value of structures and property at risk. Data for earthquake, flood, wildfire, and other hazards based on approved LHMPs as of May 2017 is outlined below. Not surprisingly, earthquakes generally put the most people and property at risk in California.

TABLE 8: STATEWIDE RISK AND EXPOSURE, MAY 2017

Statewide Risk and Exposure - May 2017	Earthquake	Flood Risk	Fire Risk	Other Hazard Risk
Structures subject to earthquake risk	7,270,459	379,953	737,491	1,942,642
People subject to earthquake risk	3,401,541	871,070	2,072,358	4,182,930
Critical facilities subject to earthquake risk	9,238	6,434	11,650	14,160
Potential value of structures/property subject to earthquake risk	\$230 billion	\$44.4 billion	\$192 billion	\$135 billion

SOURCE: 2018 CALIFORNIA STATE HAZARD MITIGATION PLAN

I. Safety Element of County General Plans

The State of California mandates that counties develop a Safety Element as part of its general plan to address protection of the community from natural hazards, including the effects of climate change.²⁵ The county general plan Safety Element covers land uses and protections from risks from geologic hazards, flooding, and wildland and urban fires, as well as conservation efforts. The Safety Elements were added to the general plans under SB-379 for counties to assess vulnerabilities and have a better understanding of how their region has been impacted by climate change. Understanding climate adaptation allows officials to identify and implement resiliency measures and reduce risks to the community. The figure below summarizes the Safety Elements by county and the year the Safety Element was last updated. Safety Elements are reviewed and approved by CAL FIRE.

TABLE 9: SUMMARY OF GENERAL PLAN SAFETY ELEMENTS

County	Year Adopted	Safety Element Summary
Butte ²⁶	2016	<ul style="list-style-type: none"> • Policies to project the community through the year 2030. • Covers noise, floods, seismic and geologic hazards, fires, hazardous materials, disaster preparedness, and community health.
Lake ²⁷	2008	<ul style="list-style-type: none"> • Provides goal, policies, and implementation measures designed to protect public health, safety, and welfare of community from unreasonable risks while minimizing damage to structures, property, and infrastructure resulting from natural and man-made hazards.

²⁵ California Legislative Information. Senate Bill-379, Land Use: General Plan: Safety Element (2015-2016). Available at: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201520160SB379

²⁶ Butte County General Plan 2030, Ch. 11 Health And Safety Element, http://www.buttecounty.net/Portals/10/Planning/General%20Plan/2018%20Updated%20GP/11_Health_Safety_PRR.pdf.

²⁷ Lake County General Plan, Chapter 7 Health and Safety Element. Available at: <http://www.lakecountyca.gov/Assets/Departments/CDD/2008+General+Plan+Final+Version/2008+General+Plan+Docs/Chapter+7+-+Health+and+Safety.pdf>.

Los Angeles ²⁸	1990	<ul style="list-style-type: none"> Identifies environmental hazards including seismic activity, geotechnical hazards, floods, and fires. Outlines regulations in place to mitigate risks and identifies agencies that provide oversight.
Mendocino ²⁹	2009	<ul style="list-style-type: none"> Sets policy to minimize natural hazard risks (e.g., earthquakes, wildfire, flooding) as well as manmade hazards and nuisances (e.g., noise, poor air quality, hazardous materials).
Nevada ³⁰	2014	<ul style="list-style-type: none"> Centered on emergency preparedness for natural hazards including seismic activity, floods, fires, severe weather, and manmade environmental hazards, including airport and military airspace hazards, hazardous materials, and public safety services and facilities issues. Designed to mitigate disasters by addressing the impacts of developing in high-risk areas, management of the natural environment as it pertains to potential hazards, and by outlining a rapid response system that includes assuring the supporting infrastructure necessary for disaster responses as well as a logistical plan.
Napa ³¹	2009	<ul style="list-style-type: none"> Identifies earthquakes, fires, floods, liquefactions (when water saturated soil “liquifies” during an earthquake and structures sink into the ground), and dam inundation as potential risks to public safety. References the Napa County Operational Area Hazard Mitigation Plan (NOAHMP), adopted in 2004, as the primary resource for detailed analyses of each of the potential hazard types. Policies related to interdepartmental cooperation in hazard mitigation efforts, information dissemination, risk evaluation, and the need for individual/community disaster plans are outlined in the safety element.
Santa Barbara ³²	2015	<ul style="list-style-type: none"> Identifies known and potential hazards, outlines existing resources and policies, provides information on existing partnerships, jurisdictions, emergency response plans, and additional recommendations.

²⁸ County of Los Angeles Department of Regional Planning. December 1990. Los Angeles County General Plan, Safety Element. Available at: http://planning.lacounty.gov/assets/upl/project/gp_web90-safety-element.pdf.

²⁹ County of Mendocino. September 2008. General Plan Update, Draft Environmental Impact Report. Chapter 4.6 Geology, Soils, and Mineral Resources. Available at: <https://www.mendocinocounty.org/home/showdocument?id=6412>.

³⁰ Nevada County General Plan Volume 1. No Date. Chapter 10: Safety. Available at: <https://www.mynevadacounty.com/DocumentCenter/View/12582/Chapter-10-Safety-2014-PDF>.

³¹ Napa County. June 2009. Napa County General Plan: Safety. Available at: <https://www.countyofnapa.org/DocumentCenter/View/3326/Safety-Element-PDF>.

³² Santa Barbara County Department of Planning and Development. February 2015. Santa Barbara County Comprehensive Plan: Seismic Safety & Safety Element. Available at: <http://longrange.sbcountyplanning.org/programs/genplanreformat/PDFdocs/Seismic.pdf>

Sonoma ³³	2014	<ul style="list-style-type: none"> • Intended to protect community from unreasonable risks from seismically induced surface rupture, ground shaking, ground failure, tsunami, dam failure, slope instability leading to mudslides, landslides, subsidence and other known geologic hazards, flooding, and fire. • Includes maps of known hazards, and assesses evacuation routes, water supply needs, road widths, clearances around structures, and items related to potential catastrophic events.
Ventura ³⁴	2016	<ul style="list-style-type: none"> • Designed to inventory and monitor natural and man-made resources with discretionary development as it pertains to environmental concerns in mind. • Specific hazard mitigation goals aim to minimize the risk to the community, society, and structures that result from disasters by identifying programs for investigation and alleviation of risks, providing guidance for discretionary development toward the same end, and by outlining specific policies for risk reduction.
Yuba ³⁵	2011	<ul style="list-style-type: none"> • Identifies goals, objectives, and implementation plan for seismic safety, fire hazards, flood hazards, and airport hazards in the safety element. • Reviews jurisdictions and emergency services.

J. Low Income Population in Most Impacted and Distressed Areas

Proposed mitigation programs and projects must prioritize the protection of low-and-moderate income (LMI) persons and meet the overall LMI benefit national objective. Fifty percent of CDBG-MIT funds must be spent to benefit LMI persons 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.³⁶ Statewide median income as of 2019 for a family of four in California is \$82,200; a household of four is considered LMI if earning a gross income of \$65,750 or less.³⁷

³³ Sonoma County Permit and Resource Management Department. September 2014. Sonoma County General Plan 2020: Public Safety Element. Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/Public-Safety/>.

³⁴ Ventura County Board of Supervisors. March 2019. Ventura County General Plan. Available at: <https://docs.vcrma.org/images/pdf/planning/plans/Goals-Policies-and-Programs.pdf>

³⁵ Yuba County Community Development & Services Agency. June 2011. Yuba County 2030 General Plan, Chapter 6: Public Health and Safety Element. Available at: <https://www.yuba.org/Yuba%20County/Community%20Development/Planning/General%20Plan/Chapter%206%20Public%20Health%20&%20Safety%20Element.pdf>

³⁶ U.S. Department of Housing and Urban Development Office of Planning and Community Development. Laws and Regulations. Low- and Moderate-Income Definitions under the CDBG Program. Available at: https://www.hud.gov/program_offices/comm_planning/communitydevelopment/rulesandregs/memoranda/lmidef84

³⁷ HUD User Fiscal Year 2019 Income Limits Documentation System. Available at: https://www.huduser.gov/portal/datasets/il/il2019/2019summary.odn?inputname=STTLT*0699999999%2BCalifornia&selection_type=county&stname=California&statefp=06.0&year=2019

TABLE 10: 2019 STATEWIDE INCOME LIMITS FOR LMI HOUSEHOLDS

Household Size	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons
Extremely Low Income (30%)	\$17,250	\$19,750	\$22,200	\$24,650	\$26,650	\$28,600	\$30,600	\$32,550
Low Income (50%)	\$28,750	\$32,900	\$37,000	\$41,100	\$44,400	\$47,700	\$50,950	\$54,250
Low Income (80%)	\$46,050	\$52,600	\$59,200	\$65,750	\$71,000	\$76,300	\$81,550	\$86,800

SOURCE: HUD 2019

The following figures provide a breakdown of the 2019 LMI HUD income limits by Municipal Service Area (MSA) within DR-4344 and DR-4353.

TABLE 11: 2019 LMI INCOME LIMITS FOR DR-4344 IMPACTED AREAS

DR-4344 Areas	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Butte County (Chico MSA)	\$37,250	\$42,600	\$47,900	\$53,200	\$57,500	\$61,750	\$66,000	\$70,250
Lake County	\$36,300	\$41,500	\$46,700	\$51,850	\$56,000	\$60,150	\$64,300	\$68,450
Mendocino County	\$36,300	\$41,500	\$46,700	\$51,850	\$56,000	\$60,150	\$64,300	\$68,450
Napa MSA	\$55,650	\$63,600	\$71,550	\$79,500	\$85,900	\$92,250	\$98,600	\$104,950
Nevada County	\$44,650	\$51,000	\$57,400	\$63,750	\$68,850	\$73,950	\$79,050	\$84,150
Orange County (Santa Ana-Anaheim-Irvine, CA HUD Metro FMR Area)	\$66,500	\$76,000	\$85,500	\$94,950	\$102,550	\$110,150	\$117,750	\$125,350
Sonoma County (Santa Rosa MSA)	\$60,500	\$69,150	\$77,800	\$86,400	\$93,350	\$100,250	\$107,150	\$114,050
Yuba County (Yuba City MSA)	\$36,300	\$41,500	\$46,700	\$51,850	\$56,000	\$60,150	\$64,300	\$68,450

SOURCE: HUD 2019

TABLE 12: 20: 2019 LMI INCOME LIMITS FOR DR-4353 IMPACTED AREAS

DR-4353 Impacted Area	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Los Angeles County (Los Angeles-Long Beach-Glendale, CA HUD Metro FMR Area)	\$58,450	\$66,800	\$75,150	\$83,500	\$90,200	\$96,900	\$103,550	\$110,250
San Diego County (San Diego-Carlsbad MSA)	\$59,950	\$68,500	\$77,050	\$85,600	\$92,450	\$99,300	\$106,150	\$113,000
Santa Barbara County (Santa Maria-Santa Barbara, CA MSA)	\$61,850	\$70,650	\$79,500	\$88,300	\$95,400	\$102,450	\$109,500	\$116,600
Ventura County (Oxnard-Thousand Oaks-Ventura, CA MSA)	\$58,600	\$67,000	\$75,350	\$83,700	\$90,400	\$97,100	\$103,800	\$110,500

SOURCE: HUD 2019

For CDBG-MIT funding to be used as an LMI benefit, at least 51 percent of households in the area served need to be considered LMI. Based on HUD’s 2011-2015 American Community Survey (ACS) LMI summary data, the vast majority of counties within DR 4344 and DR 4353 do not meet the expenditure threshold for persons served of at least 51 percent LMI persons. Overall, DR 4344 has 47.6 percent LMI persons. The figure below shows that only Lake County meets the LMI threshold at 51.4 percent. DR 4353 has an LMI percentage of 53.2 percent. Los Angeles County is the only county within this disaster area that meets and exceeds the LMI threshold with 56 percent LMI persons.

Although most of the federally declared disaster areas do not meet the LMI threshold, the percentage of LMI households increased in some impacted counties. Between 2010 and 2015, the percentage of LMI persons collectively increased 1.4 percent for both DR 4344 and DR 4353, compared to 2 percent in the State of California. Lake County, in DR 4344 had the most significant increase of 5.3 percent during this time period.

The MID saw a slight LMI increase of 0.2 percent between 2010 and 2015. However, zip code 95422, located in Clearlake, Lake County increased 6.4 percent, going from 63.9 percent LMI persons in 2010 to 70.3 percent in 2015.

HCD will emphasize the MID as target locations for projects and LMI benefit will be a selection criterion in order to meet the LMI threshold.

TABLE 13: LOW-TO-MODERATE INCOME ANALYSIS OF THE STATE OF CALIFORNIA AND FEDERALLY DECLARED DISASTER AREAS, 2006-2010 AND 2011-2015

Geography	Total 2015 Low-to-Moderate Income Persons	Total 2015 Low-to-Moderate Universe Population	2006-2010 Percentage Low-to-Moderate Income Estimate	2011-2015 Percentage Low-to-Moderate Income Estimate	2010-2015 Change in LMI %
State of California	18,023,159	37,604,155	45.9%	47.9%	2.0%
DR-4344	2,012,880	4,230,130	45.8%	47.6%	1.8%
Butte County	99,865	217,170	43.0%	46.0%	3.0%
Lake County	32,495	63,160	46.1%	51.4%	5.3%
Mendocino County	39,105	85,250	45.6%	45.9%	0.3%
Napa County	56,785	135,745	41.3%	41.8%	0.5%
Nevada County	38,295	97,410	35.9%	39.3%	3.4%
Orange County	1,514,000	3,073,130	47.1%	49.3%	2.2%
Sonoma County	199,765	486,120	42.0%	41.1%	-0.9%
Yuba county	32,570	72,145	44.9%	45.1%	0.2%
DR-4353	7,580,759	14,243,055	51.9%	53.2%	1.3%
Los Angeles County	5,526,234	9,863,045	55.1%	56.0%	0.9%
San Diego County	1,494,925	3,134,140	44.4%	47.7%	3.3%
Santa Barbara County	202,565	416,855	48.1%	48.6%	0.5%
Ventura County	357,035	829,015	42.0%	43.1%	1.1%
DR-4344 and DR-4353 Total	9,593,639	18,473,185	50.5%	51.9%	1.4%

Source: American Community Survey 5-Year 2006-2010 and 2011-2015 Low and Moderate-Income Summary Data

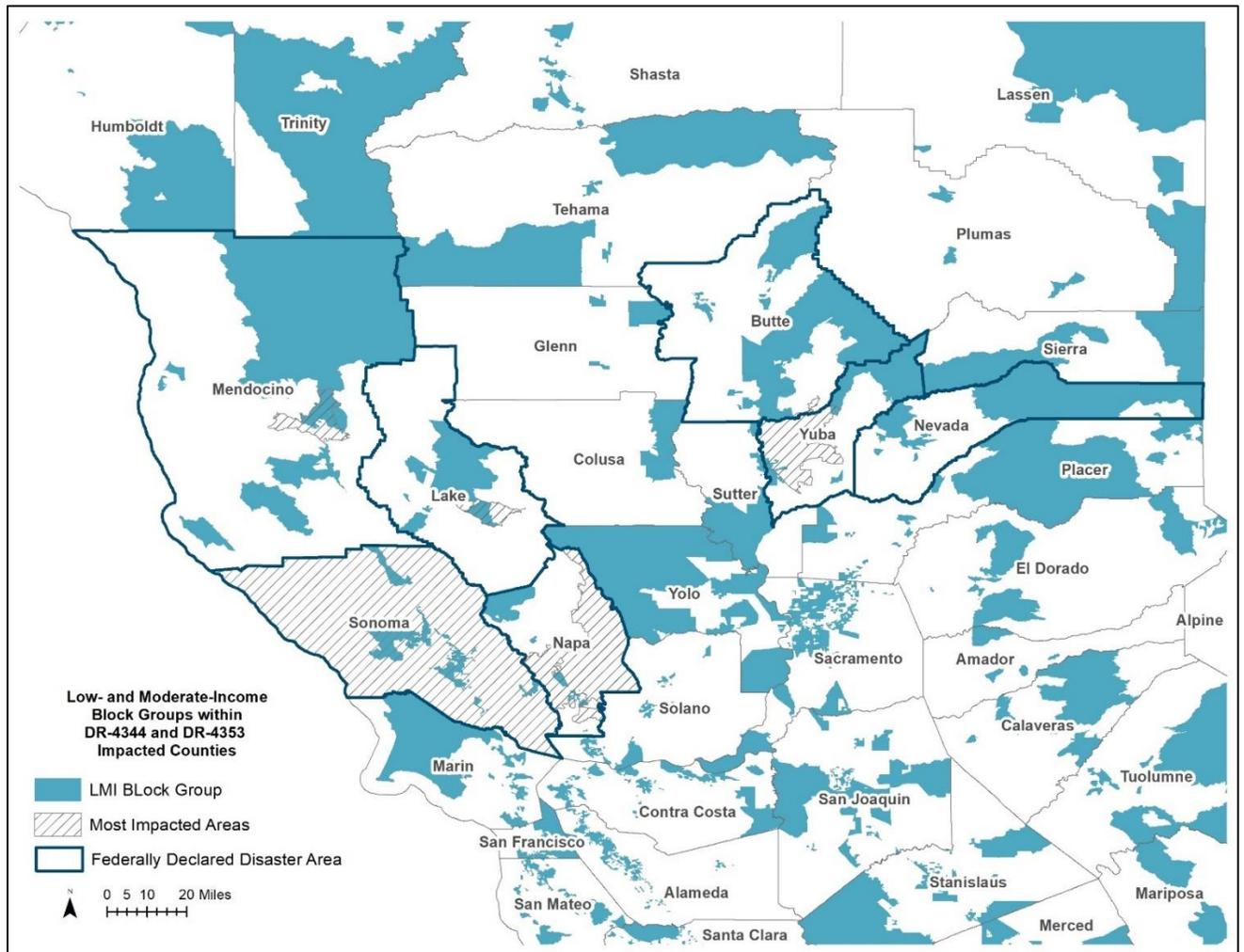
TABLE 14: LOW-TO-MODERATE INCOME ANALYSIS OF MOST IMPACTED AND DISTRESSED AREAS, 2006-2010 AND 2011-2015

County	Total 2015 Low-to-Moderate Income Persons	Total 2015 Low-to-Moderate Universe Population	2006-2010 Percentage Low-to-Moderate Income Estimate	2011-2015 Percentage Low-to-Moderate Income Estimate	2010-2015 Change in LMI %
Sonoma County	199,765	486,120	42.0%	41.1%	-0.9%
Ventura County	357,035	829,015	42.0%	43.1%	1.1%
Zip Code	Total 2015 Low-to-Moderate Income Persons	Total 2015 Low-to-Moderate Universe Population	2006-2010 Percentage Low-to-Moderate Income Estimate	2011-2015 Percentage Low-to-Moderate Income Estimate	2010-2015 Change in LMI %
95470 (Mendocino County)	2,595	8,890	36.5%	29.2%	-7.3%
95901 (Yuba County)	34,695	76,690	44.1%	45.2%	1.1%
94558 (Napa County)	30,285	75,100	42.3%	40.3%	-2.0%
95422 (Lake County)	10,855	15,445	63.9%	70.3%	6.4%
93108 (Santa Barbara)	4,055	16,225	28.0%	25.0%	-3.0%
Most Impacted and Distressed Areas Total	639,285	1,507,485	42.2%	42.4%	0.2%

Source: American Community Survey 5-Year 2006-2010 and 2011-2015 Low and Moderate-Income Summary Data

The map below shows the LMI block groups across impacted counties in Northern California for DR-4344 and DR-4353. The blue areas are block groups that have a population that is over 51 percent LMI. The hash marks highlight most impacted counties (Sonoma) and zip codes. The map includes LMI areas throughout the region because CDBG-MIT programs and activities may benefit multiple counties.

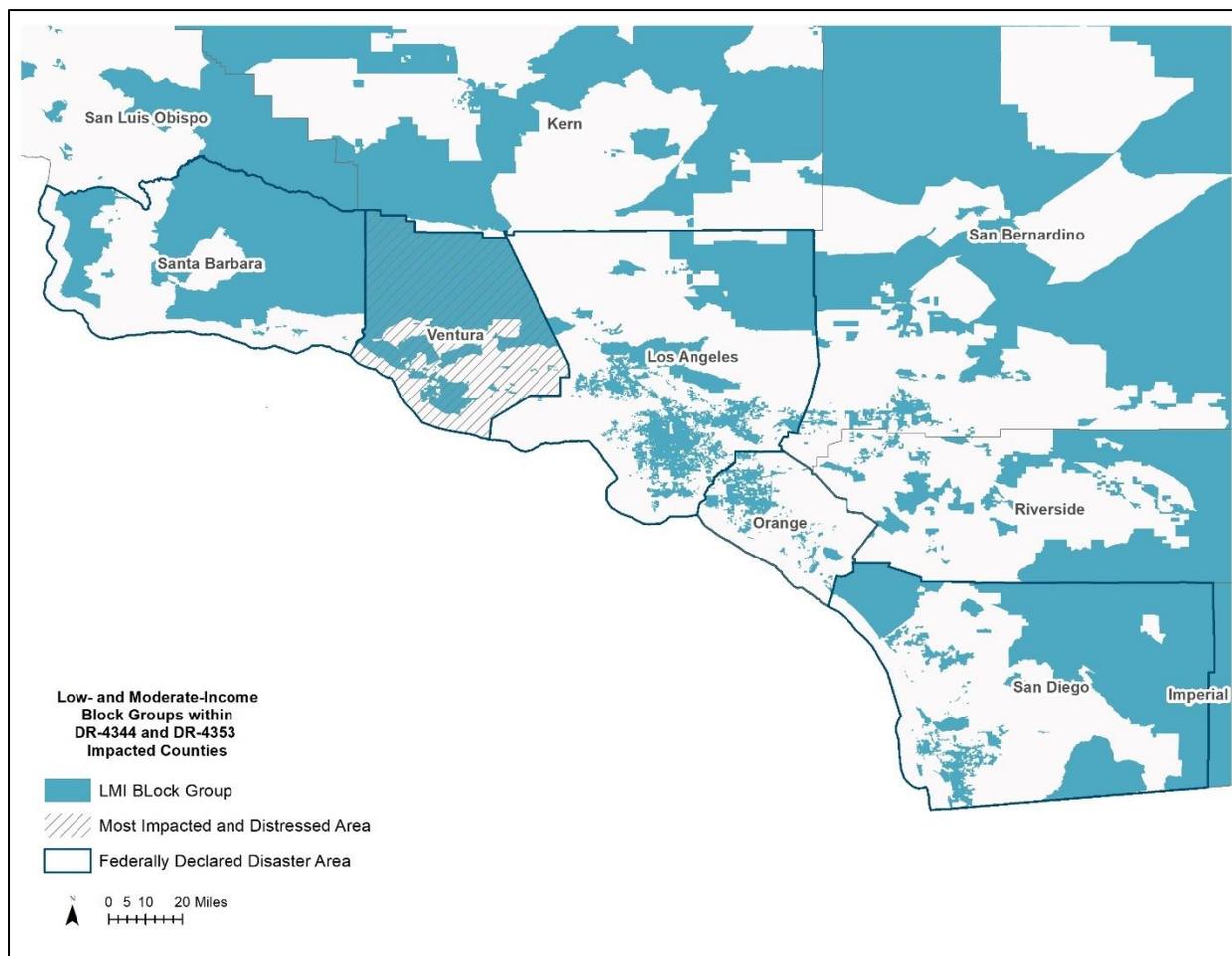
FIGURE 11: 2019 LMI BLOCK GROUPS – NORTHERN CALIFORNIA



SOURCE: ESRI, HUD, FEMA

The following shows the LMI block groups for Southern California. The map includes the MID including Ventura County and the zip code in Santa Barbara County (93108).

FIGURE 12: 2019 LMI BLOCK GROUPS – SOUTHERN CALIFORNIA



SOURCE: HUD, FEMA, ESRI

1. Affirmatively Further Fair Housing

Disasters also 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 DR-4344 and DR-4353. Due to lack of available housing, many disaster survivors, if financially able, move out of the area or state, while others are forced to live in temporary housing or lose their home.³⁸ HCD is committed to Affirmatively Furthering Fair Housing. The following provides an analysis of federal protected classes within the areas impacted by DR-4344 and DR-4353, including Most Impacted and Distressed Areas. The Fair Housing Act defines federal protected classes as race, color, national origin, religion, sex,

³⁸ Fixing America's Broken Disaster Housing Recovery System. National Low Income Housing Coalition. https://nlihc.org/sites/default/files/Fixing-Americas-Broken-Disaster-Housing-Recovery-System_P1.pdf

familial status, and disability. HCD is not proposing a housing program or providing assistance to individual beneficiaries through the current CDBG-MIT programs, but HCD affirms that CDBG-MIT funds will include requirements to further fair housing and that it will assess potential impacts on federally protected classes. Notwithstanding the nature of the proposed programming, HCD is committed to fulfilling its fair housing and civil rights duties for all CDBG-MIT activities. Furthermore, fair housing and civil rights obligations, including potential impacts to protected classes, will be taken into consideration in the event that CDBG-MIT funds are re-programmed in the future. HCD is committed to an ongoing assessment of impacts of CDBG-MIT investments to protected classes. This commitment will be demonstrated during the program design phase, and, more specifically, once the locations of proposed projects are known. As projects are proposed, HCD will conduct an analysis of potential impacts on federally protected classes and the outcomes of the analysis will be considered within the project selection process.

e) Race and Ethnicity

Within the DR-4344 and DR-4353 impacted counties, 58 percent of the population is white, followed by 13 percent Asian, and 15 percent Some other race alone. Sonoma and Ventura Counties are MID areas and the population is predominantly White; 71 percent in Sonoma County and 77 percent in Ventura County. 12 percent of Sonoma County's population identified as Some other race, and 7 percent of Ventura's population identified as Asian alone.

TABLE 15: RACE BY COUNTY

County	White alone	Black or African American	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two of more races ³⁹
Lake	49,463	1,562	2,426	661	30	8,048	3,916
Yuba	56,344	2,432	1,079	5,104	343	4,126	12,130
Santa Barbara	344,026	8,626	4,389	23,863	814	42,024	39,992
Sonoma	375,519	7,960	4,854	20,087	1,636	63,422	55,678
Napa	102,711	2,867	1,198	11,373	272	16,738	10,742
San Diego	2,335,447	166,412	20,980	390,418	13,903	205,307	340,732
Mendocino	73,121	531	3,591	1,689	170	4,020	8,600
Los Angeles	5,186,859	823,987	70,527	1,469,968	27,929	2,121,102	795,360
Butte	186,095	3,477	2,885	10,151	427	9,890	28,300
Orange	1,950,902	54,732	14,466	635,672	9,442	370,679	256,578
Nevada	91,579	655	864	1,008	154	1,379	6,906
Ventura	680,197	14,835	7,069	61,772	1,771	44,907	75,122

SOURCE: U.S. CENSUS BUREAU, 2014-2018 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES

³⁹ Combines the following categories: Two or more races; two races including some other race; two races excluding some other race, and three or more races.

Within DR-4344 and DR-4353 impacted areas, 42 percent of the population identifies as Hispanic. Within the Counties, Los Angeles County has the highest percentage of population that identifies as Hispanic, while Nevada County has the lowest percentage. For the MID Areas, 42 percent of Ventura County and 27 percent of Sonoma County identify as Hispanic.

TABLE 16: ETHNICITY BY COUNTY

County	Total Population	Hispanic or Latino	Percent Hispanic
Butte	227,075	36,358	16%
Lake	64,148	12,830	20%
Mendocino	87,422	21,679	25%
Napa	137,135	46,934	34%
Nevada	99,092	9,281	9%
Orange	3,164,182	1,080,195	34%
Sonoma	501,317	132,985	27%
Yuba	75,493	20,990	28%
Los Angeles	10,098,052	4,893,603	48%
San Diego	3,302,833	1,106,925	34%
Santa Barbara	443,738	200,060	45%
Ventura	848,112	360,017	42%
Total	19,048,599	7,921,857	42%

SOURCE: U.S. CENSUS BUREAU, 2014-2018 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES

f) Population with Limited English Proficiency

Limited English Proficiency (LEP) persons are people who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English. LEP persons are especially vulnerable in the face of disaster as they may not be able to effectively participate in or benefit from federally assisted programs. Title VI of the Civil Rights Act of 1964 requires recipients of federal financial assistance to take reasonable steps to ensure meaningful access of LEP persons.

For the development of the CDBG-MIT Action Plan, HCD followed its Citizen Participation Plan and Language Access Plan to ensure that language assistance and support services were advertised in announcements of public meetings and that all documentation and meeting materials were available in Spanish. HCD will include HUD’s LEP Guidance into all CDBG-MIT program polices (<https://www.hud.gov/sites/documents/FINALLEP2007.PDF>). The following provides a breakdown of LEP population by County for the areas impacted by DR-4344 and DR-4353. For the MID Counties, 11.2 percent of Sonoma County’s population and 15.1 percent of Ventura County’s population speak English “less than well.” To address any language barriers, HCD offered translation services on its website, made flyers and other public documents available in Spanish, which was the only language that met the four-factor analysis threshold.

TABLE 17: LANGUAGE SPOKEN AT HOME BY COUNTY

Geography	Population - Over 5 Years Old	Language Speakers that Speak English Less Than Well	Percent of Language Speakers that Speak English Less Than Well
Butte County	214,552	11,652	5.4%
Lake County	60,465	3,875	6.4%
Los Angeles County	9,473,307	2,266,632	23.9%
Mendocino County	82,279	7,679	9.3%
Napa County	133,212	21,084	15.8%
Nevada County	94,871	2,090	2.2%
Orange County	2,975,226	586,819	19.7%
San Diego County	3,090,864	436,345	14.1%
Santa Barbara County	415,382	72,082	17.4%
Sonoma County	475,581	53,453	11.2%
Ventura County	796,403	120,189	15.1%
Yuba County	69,367	6,417	9.3%

SOURCE: U.S. CENSUS BUREAU, 2014-2018 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES

g) Persons with a Disability

Persons with disabilities are particularly at risk of suffering negative effects from natural disasters.⁴⁰ Some of the reasons disabled people experience difficulty and are vulnerable include: inability to evacuate immediately without difficulty in the event of a sudden disaster; absence of an individual preparedness plan for natural disasters; availability of another person to help them evacuate; lack of awareness of their community’s disaster preparedness plan; and, lack of consultation during the preparation of disaster preparedness plans.

The American Community Survey measures six disability types⁴¹:

- Hearing Difficulty, deaf or having serious difficulty hearing.
- 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.

The figure below shows the number and percentage by County impacted by DR-4344 and DR-4353 for noninstitutionalized populations. Lake County has the highest percentage of population with a disability at 20.1 percent, with the MID areas of Sonoma County at 12.1 percent and Ventura County at 10.9 percent. As the Camp Fire in 2018 demonstrated, the elderly and persons with disabilities are some of the highest at-risk populations during wildfire events.

⁴⁰ Ideas for Development, “Persons with Disabilities: Among the First Victims of Natural Disasters,” <https://ideas4development.org/en/persons-disabilities-among-first-victims-natural-disasters/>

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

All CDBG-MIT programs have an obligation to comply with relevant federal laws that prohibit discrimination on the basis of disability and 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.

TABLE 18: POPULATION WITH A DISABILITY BY COUNTY

Geography	Total Noninstitutionalized Population	Total Civilian Noninstitutionalized Population with a Disability	Percent of Total Noninstitutionalized Population with a Disability
Butte County	224,510	38,146	17.0%
Lake County	63,451	12,766	20.1%
Los Angeles County	10,030,450	993,035	9.9%
Mendocino County	86,575	14,566	16.8%
Napa County	138,703	16,313	11.8%
Nevada County	98,103	14,614	14.9%
Orange County	3,147,477	269,618	8.6%
San Diego County	3,204,470	314,897	9.8%
Santa Barbara County	436,711	43,333	9.9%
Sonoma County	497,067	60,313	12.1%
Ventura County	841,489	92,104	10.9%
Yuba County	73,339	11,572	15.8%

SOURCE: U.S. CENSUS BUREAU, 2014-2018 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES

h) Population Over the Age of 65

Senior households face special challenges and are disproportionately affected in the face of disasters. Challenges range from owner occupied households not having insurance as the mortgage is likely paid off, to persons unable to take medication due to lack of electricity, which is needed to properly store medications. The 2018 Camp Fire disproportionately impacted the elderly.⁴² The following table shows the percentage of population over 65 in the DR-4344 and DR-4353 impacted counties. Nevada County has the highest percentage of people over 65 at 25.4 percent, while Sonoma County's population over 65 is 18.2 percent and Ventura County's is 14.6 percent.

TABLE 19: POPULATION OVER THE AGE OF 65

County	Total Population	Population Over 65	Percent Over 65
Butte County	227,075	40,219	17.7%
Lake County	64,148	13,941	21.7%
Los Angeles County	10,098,052	1,299,277	12.9%
Mendocino County	87,422	17,845	20.4%
Napa County	140,530	25,360	18.0%
Nevada County	99,092	25,177	25.4%
Orange County	3,164,182	440,488	13.9%
San Diego County	3,302,833	439,595	13.3%
Santa Barbara County	443,738	64,775	14.6%
Sonoma County	501,317	91,097	18.2%
Ventura County	848,112	123,435	14.6%
Yuba County	75,493	9,075	12.0%

SOURCE: U.S. CENSUS BUREAU, 2014-2018 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATES

⁴² Poor, elderly and too frail to escape: Paradise fire killed the most vulnerable residents. Los Angeles Times, February 10, 2019. Available at: <https://www.latimes.com/local/lanow/la-me-ln-camp-fire-seniors-mobile-home-deaths-20190209-story.html>

i) Farm Workers

The DR-4344 and DR-4353 disasters impacted key agricultural areas within the State of California. The following provides the number of Farm Workers by County as captured through the 2017 Farm Labor Survey administered by the National Agricultural Statistics Service and United States Department of Agriculture. While this survey does not cover all farm workers or undocumented workers, it provides an overview of the work force in the impacted counties. According to 805 Undocufund, many farmworkers lost work due to smoke and evacuations due to the disasters.⁴³

TABLE 20: 2017 FARM LABOR SURVEY BY COUNTY

County	Under 10 Hired Workers	10 or More Hired Workers	Part Time Workers - 150 days or more	Not Specified	Total Workers
Butte	2,327	573	1,011	2,900	6,811
Lake	859	291	276	1,150	2,576
Los Angeles	1,742	438	494	2,180	4,854
Mendocino	1,241	611	586	1,852	4,290
Napa	2,274	1,078	1,022	3,352	7,726
Nevada	550	48	109	598	1,305
Orange	401	222	198	623	1,444
San Diego	8,780	1,073	1,668	9,853	21,374
Santa Barbara	2,529	863	1,006	3,392	7,790
Sonoma	4,461	1,506	1,786	5,967	13,720
Ventura	3,885	776	1,114	4,661	10,436
Yuba	781	262	314	1,043	2,400
Total	29,830	7,741	9,584	37,571	84,726

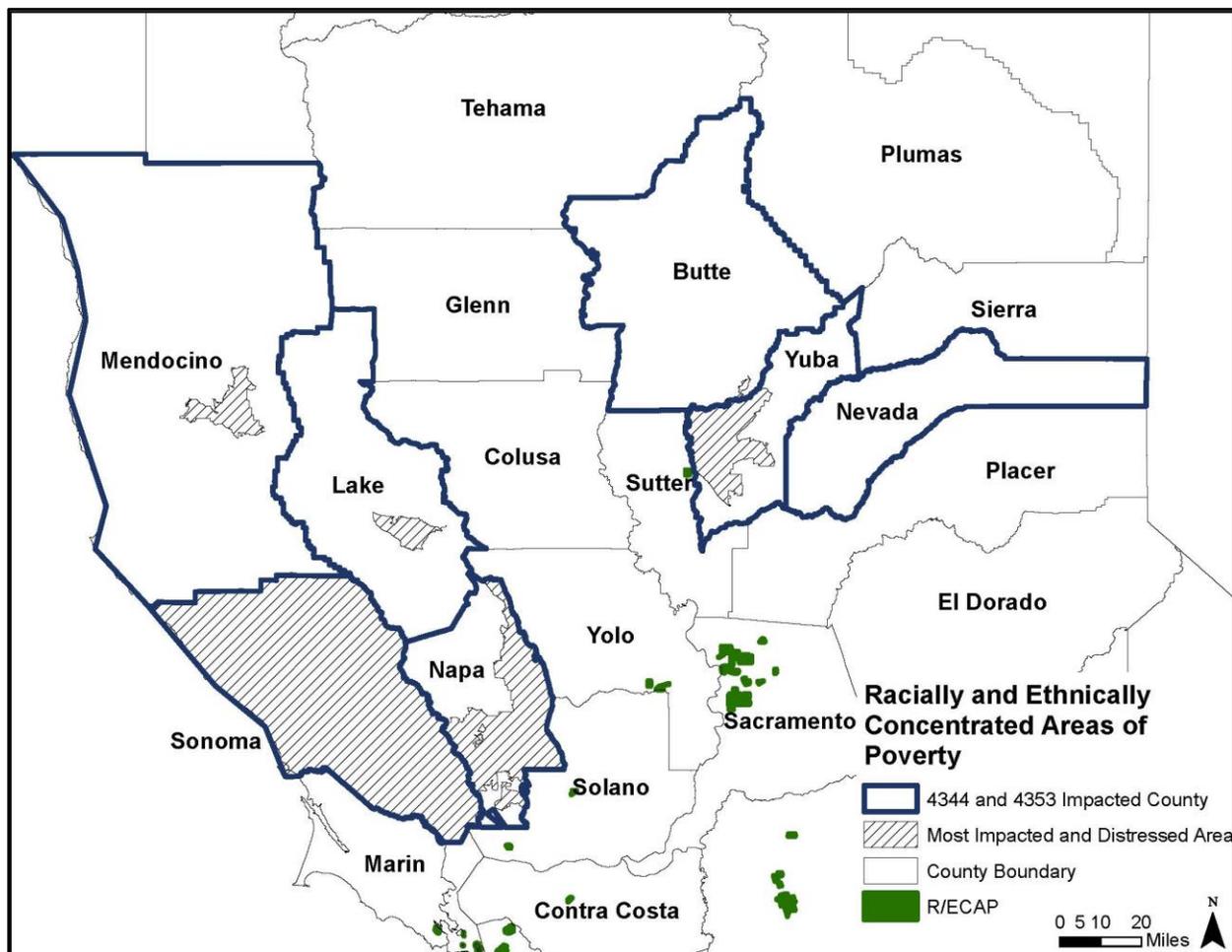
SOURCE: USDA 2017,
[HTTPS://WWW.NASS.USDA.GOV/SURVEYS/GUIDE_TO_NASS_SURVEYS/FARM_LABOR/](https://www.nass.usda.gov/surveys/guide_to_nass_surveys/farm_labor/)

⁴³ Boyd-Barrett, Claudia. January 7, 2020. Wildfires Expose gaps in Disaster Relief for Undocumented Communities. Available at: <https://www.calhealthreport.org/2020/01/07/wildfires-expose-gaps-in-disaster-relief-for-undocumented-communities/>

j) 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 poverty, or a poverty rate that is greater than three times the average poverty rate in the area.⁴⁴ The following maps show the RECAP areas within DR-4344 and DR-4353 impacted counties as well as MID areas. Within the Northern California counties and MID areas, there are no RECAP areas. For impacted areas, there are three RECAP areas within Ventura County, which is a MID area.

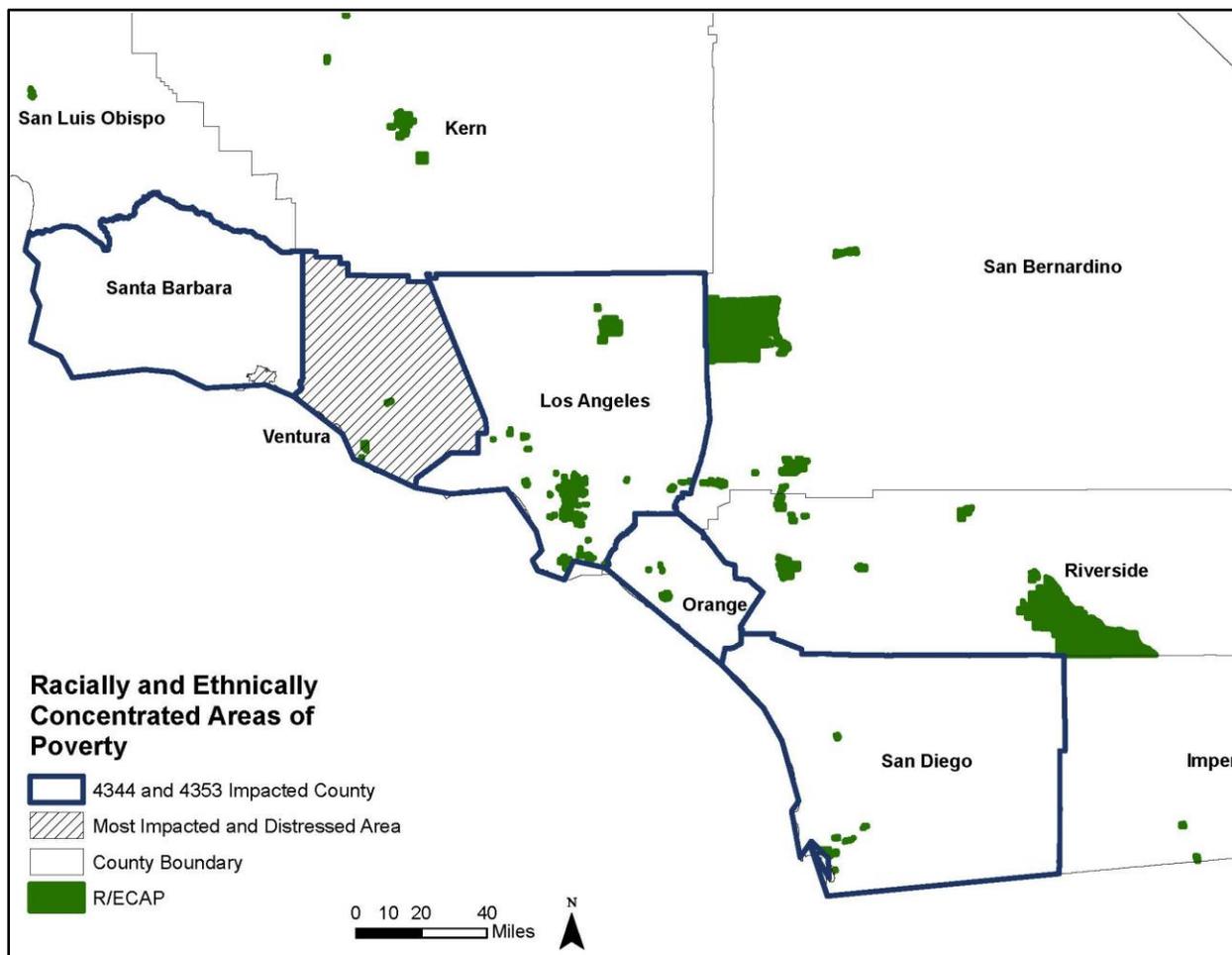
FIGURE 13: RECAP AREAS – NORTHERN CALIFORNIA



SOURCE: DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, 5/15/20

⁴⁴ Department of Housing and Urban Development, available at: https://hudgis-hud.opendata.arcgis.com/datasets/56de4e4dea8264fe5a344da9811ef5d6e_0

FIGURE 14: RECAP AREAS – SOUTHERN CALIFORNIA



SOURCE: DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, 5/15/20

2. Social Vulnerability Index

Under the DR-4344 and DR-4353 Action Plan, LMI communities were also assessed according to the Social Vulnerability Index (SoVI). The SoVI identifies vulnerabilities in communities and compares social factors, by geography, that may determine a community's uneven ability to prevent suffering and loss after a disaster. It includes many social and housing categories that may impact the community, including the LMI population, disability status, number of multifamily developments and mobile homes, and rates of overcrowding. In the unmet needs analysis completed for the DR-4344 and DR-4353 events, the SoVI provided additional information in determining where funding allocations may support mitigation for pre-existing socially vulnerable areas. This data will be used to inform the needs for mitigation assistance to LMI households or areas, and within the MID. While HCD will account for protected classes and vulnerable population in project selection, SOVI will not be used as a determining factor for project selection. The following figure shows the SoVI ratings for the MID counties and counties with MID zip codes.

TABLE 21: SOCIAL VULNERABILITY INDEX (SOVI) OF DR-4344 AND DR-4353 IMPACTED COUNTIES

DR-4344 County	Total Population	Sum of All Series Themes	Overall SoVI® Percentile Ranking
Yuba	73,897	9.5614	0.8421
Lake	64,076	9.2281	0.7895
Mendocino	87,409	8.7018	0.6842
Napa	140,823	6.5088	0.3333
Sonoma	497,776	5.7719	0.193
DR-4353 County	Total Population	Sum of All Series Themes	Overall SoVI® Percentile Ranking
Santa Barbara	439,395	8.3684	0.6316
Ventura	843,110	6.5614	0.3509

SOURCE: UNIVERSITY OF SOUTH CAROLINA, SOVI 2010-2014

K. Threat to Community Lifelines

The following section identifies risks to indispensable services and community lifelines for the State of California. In February 2019, FEMA released the Community Lifelines Implementation Toolkit which focuses on seven categories of Community Lifelines.⁴⁵ FEMA defines these lifelines as critical business, government and essential services that provide health, safety, and economic security within a community. Community lifelines in preparedness planning and recovery provide details on the critical functions and stakeholders that facilitate the most effective response and get services and infrastructure back online after a disaster. In order to examine how risks and hazards affect human health, safety, and economic security, the state has completed a quantitative analysis of the significant potential impacts and risks of these critical service areas:

- Safety and Security** - Wildfires and flood hazards create significant immediate threats to life and property in impacted communities. Emergency responders, police officers, and government officials must be able to meet critical needs to ensure the public’s safety at the time of the threat and address situations until they are able to return to normal. First responders and personnel are responsible for ensuring plans, systems, and communications are in place to meet the need of the situation, secure any threats to life, and mitigate citizen needs for recovery. According to CAL FIRE as of December 2016, statewide emergency response capability is a force of nearly 5,300 full-time fire professionals, foresters, and administrative employees, 1,783 seasonal firefighters, 2,750 local government volunteer firefighters, 600 Volunteers in Prevention, and 4,300 inmates and wards that provide 196 fire crews.⁴⁶
- Communication** – The destruction of communications infrastructure by fire severely impacts emergency notification capabilities. In the 2017 Tubbs Fire, several cellular phone towers were destroyed, affecting residents who opted for emergency notification services via their cell phones. Similarly, radio and television infrastructure are

⁴⁵ FEMA. November 2019. Community Lifelines Implementation Toolkit 2.0. Available at: <https://www.fema.gov/media-library/assets/documents/177222>

⁴⁶ CAL Fire. December 2016. Fire and Emergency Response. Available at: <https://www.fire.ca.gov/media/4932/fireandemergencyresponse.pdf>

susceptible to damage, further impacting emergency notifications (such as evacuation orders) and complicating the communication ability and safety of first responders.

- **Food, Water, Sheltering** - Water storage facilities and delivery systems are at serious risk of wildfire damage. For example, increased sediment loading due to soil erosion resulting from fires can decrease water storage capacity in dams and reservoirs. Watersheds are identified as essential pieces of California's water system. Measures to maintain and restore forested watersheds can reduce the risk of damaging fires that can cut water supplies.⁴⁷
- **Flood Risk** - The SHMP calculates that one in every five California residents live in a floodplain (500-year flood zone) and all counties in California have populations that have some exposure to flood risks. The SHMP reports that the statewide value of structures and contents at risk from a 500-year flood event is more than \$575 billion, distributed over all 10 Hydrologic Regions. Specifically, Los Angeles, Orange, and Santa Clara Counties are most in jeopardy with more than 500,000 people, structures, and contents worth more than \$70 billion, at risk of flooding. Flooding disproportionately affects urban areas, along with the high concentrations of socially vulnerable populations in California's most heavily populated counties of Southern California, Monterey Bay, and San Francisco Bay Areas. There are over 20,000 state-owned structures at risk of flooding (in 100 and 500-year flood plains) totaling \$14.22 billion at risk. In the 100-year flood zone there are \$11.62 billion at risk.
- **Transportation** - Transportation infrastructure (i.e. highways, bridges, railways) are susceptible to wildfire disruption which can severely impact emergency response and emergency evacuations of residents. The SHMP identifies the closure of U.S. Highway 101 during the 2017 Thomas fire, which impacted movement of residents and emergency response capabilities.⁴⁸
- **Health and Medical** - Wildfire and 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. Furthermore, wildfires create hazardous air quality conditions that reach far beyond the boundaries of the impacted area. California has air quality districts responsible for monitoring the safety of the air using the Air Quality Index⁴⁹ and releasing warnings to the public if it is unsafe to be outside. However, these air quality ratings do not always

⁴⁷ California's Governor's Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan. Page 532. Available at: https://www.caloes.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

⁴⁸ California's Governor's Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan. Page 53. Available at: https://www.caloes.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

⁴⁹ Air Now: Air Quality Index (AQI) Basics. Available at: <https://airnow.gov/index.cfm?action=aqibasics.aqi>

come with clear guidance for schools and other institutions for when or if closures may be warranted or other measures may be necessary.

- **Hazardous Material (Management)** – 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.
- **Energy (Power and Fuel)** - 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 operationalized (i.e. emergency generators). Issues with downed powerlines can block roadways, stopping egress and ingress of residents and first responders.⁵⁰

The focus of the Implementation Toolkit is organizing resources and activating lifelines for support during incident response. The components of the Community Lifelines are indicated below:

TABLE 22: FEMA COMMUNITY LIFELINES COMPONENTS

Community Lifelines	Component	Community Lifelines	Component
Safety and Security	Law Enforcement/Security	Energy	Power (Grid)
Safety and Security	Search and Rescue	Energy	Temporary Power
Safety and Security	Fire Services	Energy	Fuel
Safety and Security	Government Service	Communications	Infrastructure
Safety and Security	Responder Safety	Communications	Alerts, Warnings, Messages
Safety and Security	Imminent Hazard Mitigation	Communications	911 and Dispatch
Food, Water, Sheltering	Evacuations	Communications	Responder Communications
Food, Water, Sheltering	Food/Potable Water	Communications	Financial Services
Food, Water, Sheltering	Shelter	Transportation	Highway/Roadway
Food, Water, Sheltering	Durable Goods	Transportation	Mass Transit
Food, Water, Sheltering	Water Infrastructure	Transportation	Railway
Food, Water, Sheltering	Agriculture	Transportation	Aviation

⁵⁰ California’s Governor’s Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan. Page 531. Available at: https://www.caloes.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

To assess the damage previously dealt to each lifeline, FEMA Public Assistance (PA) project costs and FEMA Individual Assistance (IA) FEMA Verified Loss (FVL) for both DR-4344 and DR-4353 were reviewed for the MID.

By identifying the most heavily impacted Community Lifelines, HCD will be able to focus CDBG-MIT 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.

1. FEMA Public Assistance

The FEMA PA program is designed to provide immediate assistance to the 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 establish the impact of the disasters on infrastructure and identify the unmet need. HCD's Unmet Recovery Needs Action Plan, approved by HUD in March 2019, included a total of \$34,673,327 in Unmet Needs for FEMA PA projects.

FEMA PA projects fall under the following categories:

- Emergency Protective Work
 - 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

Figure 27 provides an overview of the FEMA PA Unmet Needs by category from the March 2019 HUD approved Unmet Recovery Needs Action Plan:

TABLE 23: STATE AND LOCAL SHARE, UNMET FEMA PA NEEDS FOR DR-4344 AND DR-4353

Category	Total Projects	State & Local Share - Unmet Need
A	51	\$24,124,079
B	168	\$0
C	42	\$2,237,204
D	11	\$412,182
E	78	\$3,948,135
F	52	\$2,283,540
G	34	\$1,668,187
Total	436	\$34,673,327

SOURCE: CAL OES, AUGUST 2018

FEMA PA projects have evolved since August 2018, but infrastructure needs continue to be a pressing need for DR-4344 and DR-4353 recovery. As of Quarter 3 of 2019, DR-4344 and DR-4353 impacted areas have \$10,155,309 in local share for Categories C through G.

TABLE 24: LOCAL SHARE FOR FEMA PUBLIC ASSISTANCE DR-4344, 2019

County	Category C	Category D	Category E	Category F	Category G	Total
Lake	\$1,067	-	\$387	\$3,181	-	\$4,636
Los Angeles	\$16,908	-	\$524,776	-	-	\$541,684
Mendocino	\$246,197	-	\$33,121	\$1,624	\$20,634	\$301,576
Napa	\$23,353	-	\$55,134	\$93,540	\$2,551	\$174,578
Orange	-	-	\$204	\$3,909	\$2,280	\$6,394
Sonoma	\$613,027	-	\$367,788	\$1,242,169	\$929,915	\$3,152,899
Yuba	\$2,047	\$17,366	\$319	\$4,958	-	\$24,690
Total	\$902,599	\$17,366	\$981,731	\$1,349,381	\$955,380	\$4,206,456

SOURCE: CAL OES, 2019

TABLE 25: LOCAL SHARE FOR FEMA PUBLIC ASSISTANCE DR-4353, 2019

County	Category C	Category D	Category E	Category F	Category G	Total
Santa Barbara	\$549,816	\$526,201	\$153,597	\$4,399,840	\$12,709	\$5,642,162
Ventura	\$31,810	\$43,137	\$56,906	\$135,422	\$39,417	\$306,691
Total	\$581,625	\$569,338	\$210,502	\$4,535,261	\$52,126	\$5,948,853

SOURCE: CAL OES, 2019

FEMA PA projects provide insight into unmet recovery need, but this data only shows part of the infrastructure needs in DR-4353 and DR-4344 impacted areas. During stakeholder consultations, all jurisdictions highlighted infrastructure projects, beyond FEMA PA projects, that would increase their resilience to reduce future loss of life and reduce the risk of future wildfires, mudslides, debris flows, and earthquakes.

2. FEMA Individual Assistance

The IA data provided by FEMA on May 24, 2018, was used to quantify housing applicants impacted by DR-4344 and DR-4353. This analysis updates the Methodology for Funding Allocation under Public Law 115-123 provided by HUD to HCD in April 2018, which used FEMA IA data from February 2018. This section presents the unmet needs calculation for renter and owner households. FEMA received 29,363 total applicants for both DR-4344 and DR-4353, including 18,035 owner occupied households (61 percent) and 11,251 renter occupied households (38 percent). Of the 29,363 total FEMA IA applicants, only 3,971 (14 percent) of applicants had an FVL above \$0. FVL is based on calculations taken from an inspector. The Stafford Act limits FEMA home repair assistance to expenses that return an eligible applicant's pre-disaster home to a safe, sanitary, and secure condition, not necessarily pre-disaster conditions. Of households with an FVL above \$0, 1,037 were owner occupied (34 percent) and 2,009 (66 percent) were renter occupied.

TABLE 26: TOTAL FEMA INDIVIDUAL ASSISTANCE APPLICATIONS

FEMA Individual Assistance	4344	4353	Total
Total Registrations	25,292	3,904	29,196
Total FVL Over \$0	2,217	831	3,048
Total with Unmet Needs	4,673	727	5,400
Average FVL	\$34,605	\$25,385	\$29,995

SOURCE: FEMA, MAY 2018

The following figure provides a breakdown of FEMA funding by community lifeline.

TABLE 27: FEMA INDIVIDUAL AND PUBLIC ASSISTANCE BY COMMUNITY LIFELINE (1 OF 2)

Disaster	Damage Verification Source	Safety and Security	Food, Water, Sheltering	Health and Medical	Energy
DR-4344	Public Assistance	\$140,127,539	\$348,823	\$33,953,185	\$11,306,594
DR-4344	Individual Assistance	N/A	N/A	N/A	N/A
DR-4353	Public Assistance	\$124,103,447	\$1,509,200	\$2,211,264	\$4,611,521
DR-4353	Individual Assistance	N/A	N/A	N/A	N/A
Total	-	\$246,230,896	\$1,858,023	\$36,164,449	\$15,918,115

TABLE 28: FEMA INDIVIDUAL AND PUBLIC ASSISTANCE BY COMMUNITY LIFELINE (2 OF 2)

Disaster	Damage Verification Source	Communications	Transportation	Hazardous Materials Management	Total
DR-4344	Public Assistance	N/A	\$14,253,485	\$182,950,620	\$382,940,246
DR-4344	Individual Assistance	N/A	N/A	N/A	N/A
DR-4353	Public Assistance	N/A	\$3,247,422	\$58,290,173	\$193,973,027
DR-4353	Individual Assistance	N/A	N/A	N/A	N/A
Total	-	N/A	\$17,500,907	\$241,240,793	\$576,913,273

L. 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 seven 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.

TABLE 29: STATEWIDE HAZARDS BY COMMUNITY LIFELINE (1 OF 2)

Hazard	Safety and Security	Food, Water, Sheltering	Health and Medical	Energy
Agricultural Pest/Invasive species	Very Low Threat	High 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
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

TABLE 30: STATEWIDE HAZARDS BY COMMUNITY LIFELINE (2 OF 2)

Hazard	Communications	Transportation	Hazardous Material Management	Combined Threat
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	High Threat

Earthquake	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Flood	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Hazardous Material Release	Moderate Threat	Moderate 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	Moderate 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

M. CDBG-DR Considerations

Mitigation funds are tied to CDBG-DR requirements and planning under Public Law 115-123. The 2017 CDBG-DR Action Plan is focused on the recovery of communities impacted by wildfires and mudflows from DR-4344 and DR-4344 through housing rehabilitation, affordable multi-family housing development, and infrastructure repairs. However, the 2017 CDBG-DR Action Plan also recognized the need for preventative measures in rebuilding to limit future losses and outlined requirements for new construction to meet the most recent state resilience measures. FEMA and Pew Charitable Trusts research have shown that investments in mitigation measures can lead to significant savings in disaster recovery spending, estimating that for every one dollar invested, mitigation saves as much as six dollars in disaster recovery spending.⁵¹ The figure below shows the average per dollar amount spent by the State of California by disaster type.

TABLE 31: SAVINGS PER DISASTER FOR EVERY DOLLAR SPENT ON MITIGATION

State	Floods	Winds	Earthquakes	Fires
California	\$6.55	\$7.00	\$2.80	\$3.27

SOURCE: STAUFFER, FOARD, SPENCE. 2019. THE PEW CHARITABLE TRUSTS. DATA HIGHLIGHT STATE-BY-STATE BENEFITS OF FEDERAL NATURAL DISASTER MITIGATION GRANTS. AVAILABLE AT [HTTPS://WWW.PEWTRUSTS.ORG/EN/RESEARCH-AND-ANALYSIS/ARTICLES/2019/06/17/DATA-HIGHLIGHT-STATE-BY-STATE-BENEFITS-OF-FEDERAL-NATURAL-DISASTER-MITIGATION-GRANTS](https://www.pewtrusts.org/en/research-and-analysis/articles/2019/06/17/data-highlight-state-by-state-benefits-of-federal-natural-disaster-mitigation-grants)

As a result, CDBG-MIT and CDBG-DR programs and outcomes will coordinate to address similar needs and build community resilience to wildfire and flood hazards. While CDBG-DR will emphasize housing recovery, there are resilience elements incorporated into the requirements so building materials and clearance and designs have greater fire resistance. Similarly, infrastructure projects under CDBG-DR will be held to the same requirements as CDBG-MIT in terms of reducing impacts and risks in future disasters. HCD is integrating mitigation-focused staff into the CDBG-DR Section to ensure proper coordination and oversight of the two grants and related programs.

⁵¹ 2018 The Pew Charitable Trusts. January 11, 2018. "Every \$1 Invested in Disaster Mitigation Saves \$6" Available at [https://www.pewtrusts.org/en/research-and-analysis/articles/2018/01/11/every-\\$1-invested-in-disaster-mitigation-saves-\\$6](https://www.pewtrusts.org/en/research-and-analysis/articles/2018/01/11/every-$1-invested-in-disaster-mitigation-saves-$6)

N. Assessing Priorities

The Mitigation Needs Assessment considered data on the impacts of common and frequent hazards in the state, including current plans and outcomes from past efforts to address risks and recovery. After reviewing priorities of the SHMP, local HMPs, and FEMA tools and resources, a selection of projects and programs were considered for proposal under this Action Plan with the following considerations:

- Focus on eligible activities
- Scale of geography within the MID
- Available local resources and other funding sources
- Feasibility and capacity needs

HCD intends to use CDBG-MIT funds in ways that are most impactful and coordinated with the state and local priorities. Projects under CDBG-MIT will focus on emergency infrastructure and forest and watershed infrastructure, as well as planning and capacity building to support local governments build out plans and resources for mitigation efforts in the long term. HCD will coordinate with other state and federal resources but will prioritize projects that cannot be funded by allocations other than CDBG-MIT.

HCD will utilize metrics and/or indicators to assess potential mitigation methods for their effectiveness in mitigating risk to community lifelines. HCD will also calculate benefits through the consideration of risk reduction value. Furthermore, HCD will consider how projects will address the functional needs of persons in protected classes, as well as other vulnerable persons.

The 2018 California SHMP outlines four goals and multiple strategies for each goal to reduce risk across the State of California. The CDBG-MIT cannot address all goals and strategies in the SHMP, but the proposed activities of planning, public services, and resilient infrastructure overlap with many of the goals and strategies outlined in the SHMP. The following section draws from Section 3.3 of the SHMP and identifies relevant mitigation goals and strategies where the CDBG-MIT activities align with the SHMP.⁵²

⁵² California Governor's Office of Emergency Services. September 2018. State of California Hazard Mitigation Plan, Section 3.3. Page 67. Available at: https://www.Cal OES.ca.gov/HazardMitigationSite/Documents/002-2018%20SHMP_FINAL_ENTIRE%20PLAN.pdf

Goal 1: Significantly reduce life loss and injuries, especially low-income and vulnerable communities.

Between 2013 and 2018, the most fatalities related to disasters in the State of California are attributed to wildfire in the wildland urban interface (WUI) in mountainous region.

- Objective 1 - Improve understanding within all governmental levels, the private sector, and individuals, of the locations, potential and cumulative impacts, and linkages among threats, hazards, risks, and vulnerability; as well as measures needed to protect human life, health, and safety, including those of vulnerable populations.
- Objective 2 - Ensure that hazard mitigation measures selected and the allocation of mitigation funds address the historic adverse effects of disasters on areas with a relatively high population of persons in protected classes and other vulnerable populations. Such persons include racial and national origin minorities, persons with a disability, the elderly, members of tribes, and persons with limited English proficiency. Prior to ranking and selecting projects, selecting mitigation measures, and allocating CDBG-MIT funds, the State will reach out to such persons and organizations that represent them to obtain a greater understanding of historic patterns of segregation and under-service with respect to disaster relief and recovery, as well as their functional needs.

Goal 2: Minimize damage to structures and property and minimize interruption of essential services and activities.

- Objective 4 - Reduce repetitive property losses due to flood, fire, and earthquake by updating land use, design, and construction policies.
- Objective 5 - Establish and maintain partnerships among all levels of government, private sector, community groups, and institutions of higher learning that improve and implement methods to protect property, lifelines, and essential services.
- Objective 6 - Support the protection/redundancy of vital records, the strengthening or replacement of buildings and infrastructure, and the protection/redundancy of lifelines to minimize post-disaster disruption and to facilitate short-term recovery and strengthen long-term recovery.

Goal 3: Protect the environment.

- Objective 2: Encourage hazard mitigation measures that promote and enhance nature-based solutions, natural processes, and ecosystem benefits while minimizing adverse impacts to the environment.
- Objective 3 - Encourage mitigation planning programs at all levels of government to protect the environment and promote enforcement of sustainable mitigation actions.

Goal 4: Promote community resilience through integration of hazard mitigation with public policy and standard business practices.

- Objective 1 - Create incentives for community resilience through preparation, adoption, and implementation of multi-hazard mitigation plans and projects at all governmental levels.
- Objective 2 - Acknowledge, incorporate, and integrate recognized data on climate change impacts on hazards, risks, and vulnerabilities available from credible scientific

sources into state, local, tribal, and private sector mitigation plans, strategies, and actions.

- Objective 3 - Promote, coordinate, and implement hazard mitigation plans and projects that are consistent with and supportive of climate action and adaptation goals, policies, and programs at all governmental levels.
- Objective 5 - Engage a broad range of stakeholders, from different sectors and community groups, in hazard mitigation planning processes to improve cross sector-coordination and emphasize engagement with underserved or vulnerable populations and other underrepresented groups, to ensure that social equity and environmental justice issues are integrated into hazard mitigation planning.

While the SHMP includes additional mitigation activities, goals, and strategies, this Action Plan focuses on activities that build local capacity, support resilient planning activities for reducing risk, and projects that build long term resilience through emergency and hazard mitigation infrastructure activities. CDBG-MIT programs and activities must primarily serve the MID, and reduce risk to the MID, so the proposed activities focus on leveraging existing funding, such as FEMA HMGP and state funds, and fill gaps for eligible CDBG-MIT activities that build community resilience for areas impacted by DR-4344 and DR-4353, with a focus on the MID.

O. Long-Term Planning and Risk Mitigation Consideration

1. Leveraging Funds

As a department, HCD manages non-entitlement programs, providing leadership and policies to promote resilient communities for all Californians. HCD utilizes existing relationships and strives to create new partnerships with other federal and state agencies, corporations, foundations, nonprofits, and stakeholders as a means of leveraging all viable sources of funding. A full list of programs currently funded by HCD can be found on the February 2020 Notice of Funding Availability (NOFA) Calendar.⁵³ To maximize the impact of the CDBG-MIT funding provided to the state, there will be an ongoing commitment to identify and leverage additional federal and non-federal funding sources. Furthermore, HCD has funding currently available for planning and infrastructure projects. This funding will not duplicate the proposed CDBG-MIT programs; rather, it will strive to fill existing mitigation needs gaps. An overview of these programs can be found in the figure below.

TABLE 32: HCD PLANNING AND INFRASTRUCTURE FUNDING AVAILABLE, FEBRUARY 2019

Funding Source	NOFA Release Date	Application Due Date	Available Funding	Program Purpose
Affordable Housing and Sustainable Communities (AHSC)	November 2019	February 2020	\$550 million	Reduce GHG emissions through projects implementing land-use, housing, transportation, and agricultural land preservation practices to support infill and compact development and support related and coordinated public policy objectives. Funding for the AHSC program is provided

⁵³ California Department of Housing and Community Development. 2019. Notice of Funding Availability Calendar. <https://www.hcd.ca.gov/grants-funding/nofas/docs/NOFA-Schedule.pdf>

Funding Source	NOFA Release Date	Application Due Date	Available Funding	Program Purpose
				from the Greenhouse Gas Reduction Fund (GGRF), an account established to receive Cap-and-Trade auction proceeds.
Community Development Block Grant (CDBG)	January 2020	April 2020	\$60 million	Provide communities with flexible resources to address a wide range of unique community development needs including public facilities, infrastructure, public services, planning and technical assistance, single-family housing rehabilitation, homebuyer assistance, infrastructure in support of housing, multi-family housing rehabilitation, business assistance, microenterprise assistance, and infrastructure in support of businesses.
Infill Infrastructure Grant Program (IIG)	October 2019	February 2020	\$194 million	Provide grants for capital improvement projects in support of qualifying infill projects or qualifying infill areas.

2. Community Wildfire Protection Plans

Community Wildfire Protection Plans are community-based planning documents that identify and address local hazards and risks from wildfire and provides a roadmap of actions for a community to address wildfire threats. Community Wildfire Protection Plans (CWPP) also create the opening for government entities to be eligible for federal funding opportunities for plan implementation. The CWPP's are authorized and defined by Title I of the Healthy Forests and Restoration Act (HFRA), passed in Congress in 2003.

CWPPs can vary in scope, scale, and detail but must meet three minimum requirements to be adopted per the HFRA and the State of California. The requirements include:

- Collaboration – CWPPs must be collaboratively developed. Local and state officials must meaningfully involve nongovernmental stakeholders and federal agencies that manage land in the vicinity of the community.
- Prioritized Fuel Reduction – CWPPs must identify and prioritize areas for hazardous fuel-reduction treatments on both federal and non-federal land.
- Treatment of Structural Ignitability – CWPPs must recommend measures that homeowners and communities can take to reduce the ignitability of structures throughout the plan area.⁵⁴

⁵⁴ City of Santa Rosa Fire Department. Community Wildfire Protection Plan. Available at: <https://srcity.org/3114/Community-Wildfire-Protection-Plan>

TABLE 33: COUNTIES IN DR-4344 AND DR-4353 WITH COMMUNITY WILDFIRE PROTECTION PLANS

DR-4344	Year Adopted	DR-4353	Year Adopted
Butte County	2008	Los Angeles County	2012
Lake County	2009	San Diego County	2006
Mendocino County	2005	Santa Barbara County	2012
Napa County	2009	Ventura County	2010
Nevada County	2009	-	-
Orange County	--	-	-
Sonoma County	2010	-	-
Yuba County	2009	-	-

SOURCE: CALIFORNIA COMMUNITY WILDFIRE PROTECTION PLANS - WILDLAND FIRE LESSONS LEARNED CENTER
[HTTPS://WWW.WILDFIRELESSONS.NET/COMMUNITIES/COMMUNITY-HOME/LIBRARYDOCUMENTS?COMMUNITYKEY=49E8C861-F977-4684-B67F-D1176E5D5B38&TAB=LIBRARYDOCUMENTS](https://www.wildfirelessons.net/communities/community-home/librarydocuments?communitykey=49e8c861-f977-4684-b67f-d1176e5d5b38&tab=librarydocuments)

3. FEMA Hazard Mitigation Grant Program

The FEMA Hazard Mitigation Grant Program (HMGP) serves as a resource to fund programs that reduce the risk of loss of life and property and is offered following a presidential major disaster declaration. HMGP funds, provided at the amount of FEMA disaster recovery assistance under the presidential declaration, are allocated on a sliding scale formula based on an appropriate percentage of the estimated total of federal assistance (less administrative costs) wherein each individual activity is required to have at least a 25 percent non-federal cost share. The HMGP funding ceiling is estimated by FEMA at 90-days post disaster and maintained at the same amount until a lock in ceiling is established six months after the disaster declaration. Twelve months after the disaster declaration a final review of the lock in ceiling determines an official final amount of HMGP fund availability. The final amount will not be less than the six-month lock-in amount.

HMGP application data to evaluate unmet needs based on local matching dollar amounts for DR-4344 and DR-4353 impacted counties. Data was evaluated by categorizing the applications by hazard, location within declaration areas, location within most impacted areas, project type, total cost, and by unmet need dollar amount. The figure below summarizes this data for the MID. As of October 2019, a total of 73 HMGP project applications were submitted to Cal OES within Impacted Areas, 67 of which are from DR-4344 and six from DR-4353. The total impacted area federal dollar amount was \$196,280,649 and the local matching (unmet) amount was \$59,315,607. Within most impacted areas projects are not distributed evenly across DR-4353 and DR-4344. DR-4344 has significantly more projects and funds than DR-4353.

Tracking the status of projects within the MID informs the Mitigation Needs Assessment. 48 applications have been approved or are under review, five in DR-4353 and 43 within DR-4344. Applications that are approved or under review in DR-4353 total \$11,673,630, federal funds total \$5,203,603 and local match amounts to \$6,533,244. DR-4344 totals \$97,884,823 with \$73,161,267 in federal funds and \$24,769,721 in unmet local match fund for applications that are approved or under review. 25 projects across the two impacted areas have been waitlisted, not submitted, withdrawn, or denied. These projects total \$86,722,196, with \$252,800 in DR-4353 and \$86,469,396 in DR-4344. The majority of these projects are in DR-4344 with only one in DR-4353.

TABLE 34: DR-4344 AND DR-4353 HMGP PROJECT SUMMARY

Disaster	Status	Count	Project Cost	Federal Share	Applicant Request Match
4353	In Review or Approved	5	\$11,673,630	\$5,203,603	\$6,470,044
4353	Waitlisted, Not Submitted, Withdrawn or Denied	1	\$252,800	\$189,600	\$63,200
4353	Total	6	\$11,926,430	\$5,393,203	\$6,533,244
4344	In Review or Approved	43	\$97,884,823	\$73,161,267	\$24,769,721
4344	Waitlisted, Not Submitted, Withdrawn or Denied	24	\$86,469,396	\$58,456,754	\$28,012,643
4344	Total	67	\$184,354,219	\$131,618,021	\$52,782,363
Total 4353 & 4344	In Review or Approved	48	\$109,558,453	\$78,364,870	\$31,239,765
Total 4353 & 4344	Waitlisted, Not Submitted, Withdrawn or Denied	25	\$86,722,196	\$58,646,354	\$28,075,843
Total 4353 & 4344	Total	73	\$196,280,649	\$137,011,224	\$59,315,607

Source: FEMA HMGP Applications, October 2019

These funds support a wide range of projects types. Projects found in the most impacted areas include:

- Acquisition
- Defensible Space
- Equipment
- Flood Control
- Generator
- Ignition-Resistant Construction
- Mitigation Reconstruction
- Miscellaneous/Other
- Planning
- Non-Structural & Structural Retrofit
- Non-Structural Retrofit
- Replanting/Reforestation
- Sea Level Rise

- Structural Retrofit
- Vegetation Management

Projects found in the other parts of the state include:

- Elevation
- Equipment
- Fire Resistant Materials
- Hazard Identification
- Post Disaster Code Enforcement
- Seismic Structural Retrofitting

The figure below illustrates the top projects across both impacted areas. DR-4353 and DR-4344 vary in their priorities; however, Equipment and Soil Stabilization/Erosion Control are common project types for DR-4344 and DR-4353 disaster impacted areas. Not all the top projects proposed for HMGP funding have been approved or are under review by FEMA.

While the status and selection of proposed HMGP projects within the MID does inform the Mitigation Needs Assessment, a project’s status as being unfunded within HMGP will not be used as a basis for allocating CDBG-MIT funds or making project selection decisions.

TABLE 35: DR-4344 AND DR-4353 HMGP PROJECT STATUS

In Review and Approved	Waitlisted, Not Submitted, Withdrawn or Denied	Overall top project of approved and waitlisted
Generator	Elevation	Soil Stabilization/ Erosion Control
Soil Stabilization/ Erosion Control	Equipment	Generator
Ignition-Resistant Construction	Soil Stabilization/ Erosion Control	Equipment
Equipment	Sea Level Rise	Elevation

Source: FEMA Public Assistance, October 2019

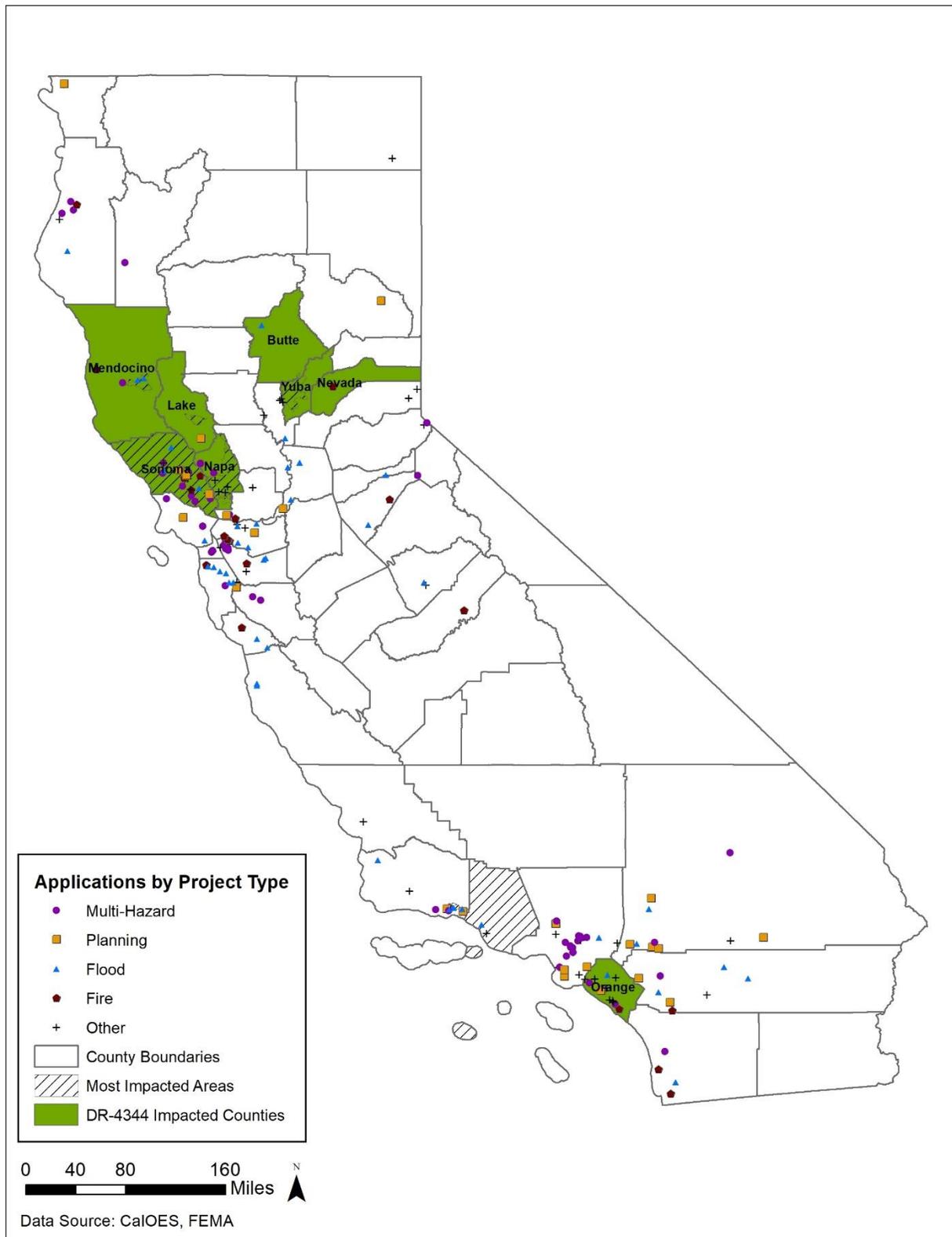
TABLE 36: DR-4344 AND DR-4353 HMGP TOP PROJECTS APPROVED AND UNDER REVIEW

4353 MID	4344 MID	4353 & 4344 MID
In Review and Approved	In Review and Approved	In Review and Approved
Acquisition	Generator	Generator
Early Warning System	Soil Stabilization/ Erosion Control	Soil Stabilization/ Erosion Control
Education Campaign	Ignition-Resistant Construction	Ignition-Resistant Construction
Soil Stabilization/ Erosion Control	Equipment	Equipment

Source: FEMA Public Assistance, October 2019

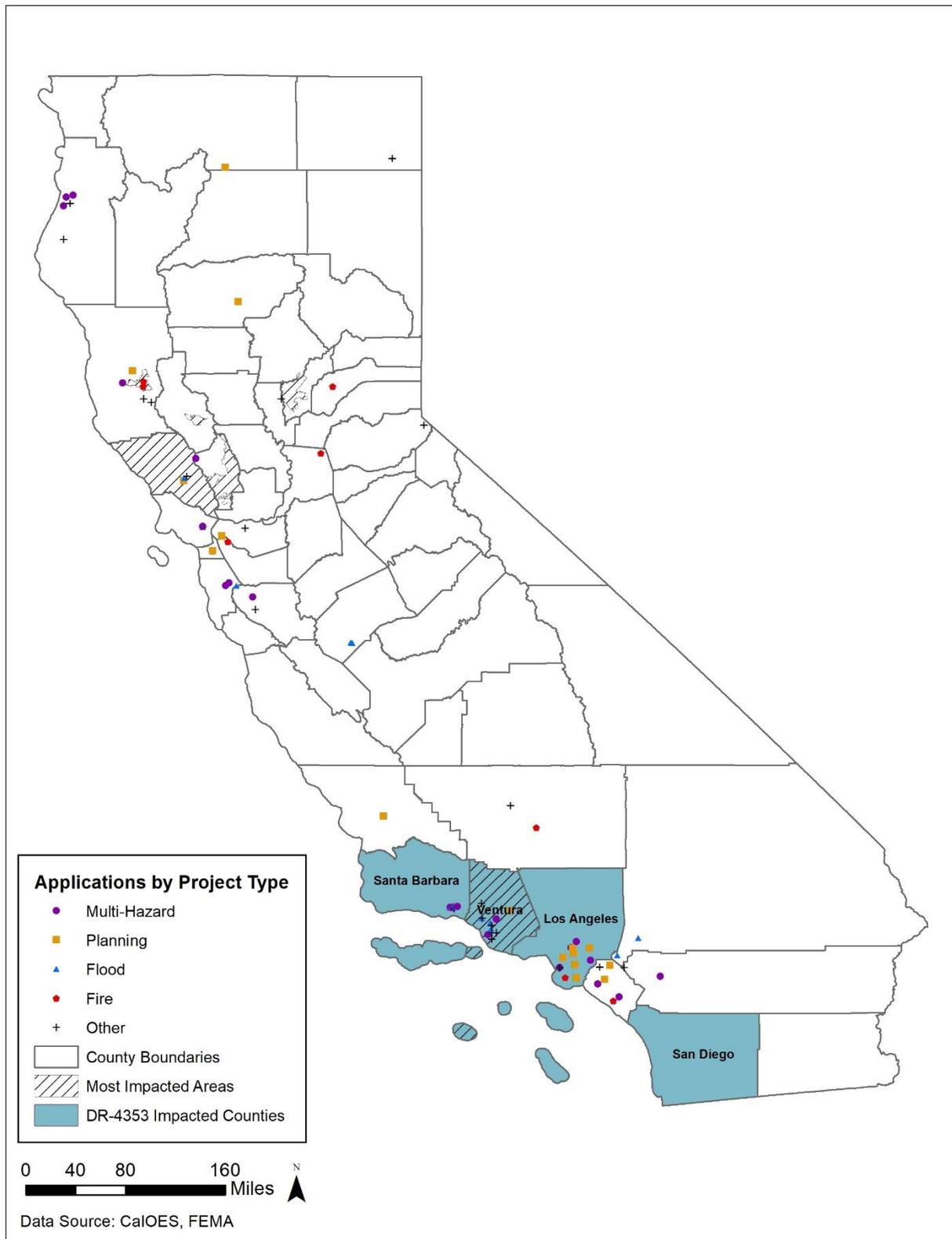
To provide further insight about the type of mitigation activities by HMGP application and the proximity of the applications to DR-4344 and DR-4353 impacted areas, the map below shows HMGP applications by project type.

FIGURE 15: DR-4344 HMGP APPLICATIONS BY TYPE



SOURCE: ESRI, FEMA, CAL OES

FIGURE 16: DR-4353 HMGP APPLICATIONS BY TYPE



SOURCE: ESRI, FEMA, CAL OES

4. AB 2140, Hancock. General plans: safety element

AB 2140⁵⁵ authorizes a city, county, or a city and county to adopt, with its Safety Element, a federally specified LHMP that includes specified elements and require Cal OES to give preference to local jurisdictions that have not adopted a LHMP with respect to specified federal programs for assistance in developing and adopting a plan.

5. SB 1035, Jackson. General plans

The Planning and Zoning Law requires cities and counties to adopt a comprehensive, long-term general plan that includes, among others, a housing element and a safety element for the protection of the community from unreasonable risks associated with the effects of various hazards, such as seismic, flooding, and wildland and urban fires. Existing law requires the housing element to be revised at least once every eight years. However, the housing element is also reviewed and updated according to revisions of the safety element. This helps jurisdictions to identify new information related to flood and fire hazards that was not previously available and be able to address risk in both elements of the general plan. Existing law also requires the safety element to be reviewed and updated as necessary to address climate adaptation and resiliency strategies applicable to the city or county.

6. SB 901, Dodd. Wildfires

SB 901⁵⁶ was signed into law to help mitigate wildfire risk and expand and speed up recovery efforts. In addition, it established the Commission on Catastrophic Wildfire Cost and Recovery within the Office of Planning and Research. The commission consists of five appointed members with specified expertise and is required to hold at least four public meetings throughout the state relating to the costs of damage associated with catastrophic wildfires. In 2019 the commission, in consultation with the Public Utilities Commission (PUC) and the Insurance Commissioner, prepared a report containing its assessment of the issues surrounding catastrophic wildfire costs and the reduction of damage, and making recommendations for changes to law that would ensure equitable distribution of costs among affected parties.

7. California FAIR Plan

The FAIR Plan is an association of all insurers authorized to provide basic property insurance in California and provides insurance of last resort. The Plan is intended to provide basic property insurance to those who cannot obtain insurance in the voluntary market due to circumstances outside of their control. No public funding is used in the FAIR Plan and it is not administered by a state agency.⁵⁷

In November 2019, the state ordered the FAIR Plan to offer more comprehensive policies and increase the amount of coverage to \$3 million, in comparison to the current basic policies that require additional coverage to meet the needs of property owners. State insurance regulators have placed a one-year moratorium banning insurers from dropping policies of homeowners in and around areas hardest hit by recent fires. This is a response to the complaints of

⁵⁵ California Legislative Information. Assembly Bill-2140 General plans: safety element (2005-2006). Available at: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB2140

⁵⁶ California Legislative Information. Senate Bill-901 Wildfires. (2017-2018) Available at: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB901

⁵⁷ California Fair Plan Property Insurance. Available at: <https://www.cfpnet.com/>

homeowners that they cannot find affordable insurance, or insurance at all. The moratorium includes more than 800,000 homeowners in zip codes next to 16 recently declared wildfire disasters in Northern and Southern California.⁵⁸

6. Governor's 2020-2021 Budget⁵⁹

Governor Newsom submitted his 2020-2021 budget request in January 2020 that includes funding to address the threat of catastrophic wildfires. The budget request includes funding to increase emergency management services, and funding to address climate change and promote resilience. The proposal uses a mix of existing programs, and new proposed programs:

- Ongoing support for CAL FIRE's forest and health and fuel reduction programs
 - Healthy and resilience forest funding
 - Update the Forest Carbon Plan and support prescribed fires and fuel reduction
 - Expanded fire safety and prevention
- Funding for resilience planning and Community Resilience Centers
 - Planning to address community specific risks and resilience
 - Build new and retrofit existing facilities to address local climate risks
- Expand funding for wildfire prevention
 - Hardening for critical community infrastructure
 - Address water infrastructure, emergency shelters, and public medical facilities in low income areas with significant wildfire risk
- Climate Resilience Bond – create a revolving loan fund to address immediate risks (drought, wildfire, flooding), and long term risks (sea level rise and extreme heat)

⁵⁸ Serna, Joseph. December 2019. "California Bans insurers from dropping policies in fire-ravaged areas". Los Angeles Times. Available at: <https://www.latimes.com/california/story/2019-12-05/california-bans-insurers-from-pulling-policies-in-fire-ravaged-areas>

⁵⁹ California Governor's Budget Summary. 2020-2021. Available at: <http://www.ebudget.ca.gov/2020-21/pdf/BudgetSummary/ClimateResilience.pdf>

III. General Requirements

A. Substantial Amendment

HCD will follow the CDBG Citizen Participation Plan and all requirements in the Federal Register Notice prior to making a substantial amendment to the Action Plan. Substantial amendments are characterized by either an addition or deletion of any CDBG-MIT funded program, any funding change greater than \$3 million of the CDBG-MIT allocation, or any change in the designated beneficiaries of the program. Substantial amendments will be available on the State of California CDBG-MIT Action Plan website

(<https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/cdbg-mit-2017/index.shtml>) for public review and comment for at least 30 days before finalization and incorporation into the comprehensive Action Plan. A summary of all comments received will be included in the final substantial amendment submitted to HUD for approval.

B. Non-substantial Amendment

Non-substantial Amendments are minor, administrative changes that do not materially alter activities or eligible beneficiaries. Such amendments will be presented to HUD five days prior to incorporation in the comprehensive Action Plan. Every amendment to the Action Plan (substantial and non-substantial) will be numbered and posted on the HCD website.

C. 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. They must also expend program income prior to additional grant funds being drawn down.

Local government subrecipients may retain program income for the repair, operation, and maintenance of publicly owned and operated projects with CDBG-MIT funds, provided that: (1) the agency that owns and operates the project has entered into a written agreement with HCD that commits the agency to providing not less than 50 percent of funds necessary for the annual repair, operating and maintenance costs of the project; and (2) HCD adopts policies and procedures to provide for HCD's regular, on-site inspection of the project in order to ensure its proper repair, operation and maintenance. As a state HUD grantee, HCD retains the right to request a future waiver from HUD for the use of program income for this purpose.

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 all program income to HUD through the DRGR on a quarterly basis. 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 tracked through the Standard Agreement system of record. As HCD finalizes program designs and determines if program income will be generated, HCD will refine the program income section of the Mitigation Addendum to the CDBG-DR Grants Administration

Manual (CDBG-MIT GAM Addendum) to accurately describe how program income will be managed.⁶⁰

When implementing activities that could generate program income, HCD will develop and adopt program income policies and procedures for the specific program. The state does not anticipate program income from the administration of the projects and programs in this Action Plan; however, program income generated by CDBG-MIT funds under this grant will be returned to HCD, unless otherwise specified in program policies and procedures.

D. Construction Standards

The State Housing Law Program under HCD continuously refines building standards to ensure they comply with new or changing laws and regulations and develops statewide building standards for new construction of all building types and accessories. The State Housing Law Program also develops the building standards necessary to provide accessibility in the design and construction of all housing other than publicly funded housing. The building standards are published as the California Building Standards Code under title 24 California Code of Regulations, and construction standards in the Standard Agreement must meet or exceed all applicable requirements for housing or building construction.

All new construction is required to pass quality inspections and code enforcement inspections over the development of the project. New construction and alterations must meet applicable accessibility standards and other requirements of the federal Fair Housing Act, substantially equivalent state and local laws, Titles II and III of the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. HCD will require a one-year post construction warranty period for all work performed on CDBG-MIT projects, including work completed by subcontractors.

1. Green Building Standards

HUD requires all rehabilitation, reconstruction, and new construction to be designed to incorporate principles of sustainability, including water and energy efficiency, resilience, and mitigating the impact of future disasters. Wherever feasible, the State of California follows best practices, such as those provided by the U.S. Department of Energy, Home Energy Professionals: Professional Certifications and Standard work specifications. For CDBG-MIT funded projects, HUD requires green building standards for replacement and new construction of residential housing.

a) 2019 Building Energy Efficiency Standards

The State of California intends to promote high quality, durable, and energy efficient construction methods in areas impacted by the 2017 fires. All newly constructed buildings must meet locally-adopted building codes, standards, and ordinances. In May 2018, the California Energy Commission adopted new building standards that require all newly constructed homes to include solar photovoltaic systems, effective January 1, 2020. Homes built with the 2019 standards will use approximately 53 percent less energy than those built under current 2016

⁶⁰ California Department of Housing and Community Development, "Community Development Block Grant Program - Disaster Recovery (CDBG-DR)" webpage. Available at: <http://www.hcd.ca.gov/community-development/disasterrecoveryprograms/cdbg-dr.html>.

standards. The California Energy Commission estimates a cost of \$9,500 per home for initial solar installation.⁶¹

b) Green Building Standards

All new construction of residential buildings or reconstruction of substantially damaged buildings must incorporate the state's green building standards. California Green Buildings Standards Code (CALGreen) is California's first green building code, enacted as mandatory in 2011, and adopted to address five divisions of building construction and improve public health, safety and general welfare. The divisions addressed are as follows: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen applies to the planning, design, operation, construction, use, and occupancy of nearly every newly-constructed building or structure in the state, as well as additions and alterations to existing buildings that increase the building's conditional area, interior volume, or size.⁶²

2. Residential Construction Standards

In the event programs under this Action Plan do support housing, all residential construction projects will comply with the housing construction codes of the State of California. Housing construction codes for building in California follow federal and state laws, regulations, and adaptations for construction of single family and multifamily units.

Construction standards for HCD's housing projects can be referenced in the *Guide to California Housing Codes*.⁶³ Housing construction will also be built to meet the requirements of HUD's Green Building Standards and CALGreen.

3. Small Business Rehabilitation Construction Standards

At this time, small business rehabilitation is not being funded by this Action Plan. If there are program changes to include small business rehabilitation, HCD will amend the Action Plan and incorporate small business rehabilitation construction standards.

4. Elevation Standards

HCD requires its subrecipients and contractors to comply with the national floodplain elevation standards for new construction, repair of substantially damaged structures, or substantial improvements to residential structures in flood hazard areas. All structures designed for residential use within a 100-year (or one percent annual chance) floodplain will be elevated with the lowest floor at least two feet above the base flood elevation level and comply with the requirements of 83 FR 5850 and 83 FR 5861.

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

⁶¹ California Energy Commission, Efficiency Division. March 2018. 2019 Building Energy Efficiency Standards, Frequently Asked Questions. Available at: https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.

⁶² California Department of Housing and Community Development, Building Standards, CALGreen Compliance. Available at: <http://www.hcd.ca.gov/building-standards/calgreen/index.shtml>.

⁶³ California Department of Housing and Community Development. January 2014. A Guide to California Housing Construction Codes. Available at: <http://www.hcd.ca.gov/building-standards/state-housing-law/docs/HCDSHL600.pdf>.

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

Where a neighborhood or large tract of houses have substantial damage and also require elevation, the overall impact of elevation on the long-term affordability and maintenance of the housing stock for that area will be considered in determining the best and most reasonable way forward to provide repairs.

5. Mold Remediation

California housing code lists both mold and dampness as conditions of substandard housing that must be remediated. All new construction is expected to be mold-free at time of completion and pass code inspection. In the event programs under this Action Plan do support housing, any mold discovered in existing structures must be remediated appropriately and meet housing construction codes of the State of California.

6. AB 2911, Friedman. Fire Safety

AB 2911⁶⁴ requires the State Fire Marshal, no later than January 31, 2020, in consultation with the Director of Forestry and Fire Protection and the Director of Housing and Community Development, recommend updated building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading based on lessons learned from the wildfires of 2017 and to develop a list of low-cost retrofits that provide for comprehensive site and structure fire risk reduction. In addition, the law requires, on or before July 1, 2021, and every five years thereafter, the State Board of Forestry and Fire Protection, in consultation with the State Fire Marshal, to survey local governments and fire districts to identify existing subdivisions, in either a state responsibility area or a very high fire hazard severity zone, that are at significant fire risk and without secondary egress routes. It also authorizes the director of the Department of Forestry and Fire Protection to authorize an owner of any other property to construct a firebreak, or implement appropriate vegetation management techniques, if it is determined by the director as necessary to protect life, property, and natural resources from unreasonable risks associated with wild land fires.

Finally, AB 2911 authorizes any person who owns, controls, operates, or maintains any electrical transmission or distribution line to traverse land as necessary, regardless of land ownership or express permission from the landowner, after providing notice and an opportunity to be heard to the landowner, to prune trees to maintain clearances, and to abate any hazardous, dead, rotten, diseased, or structurally defective live trees. The bill would provide that these provisions do not exempt any person who owns, controls, operates, or maintains any electrical transmission or distribution line from liability for damages for the removal of vegetation that is not covered by any easement granted to him or her for the electrical transmission or distribution line.

⁶⁴ California Legislative Information. Assembly Bill- 2911 Fire Safety (2017-2018). Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB2911

7. SB 901, Dodd. Wildfires.

SB 901⁶⁵ was signed into law to help mitigate wildfire risk and expand and speed up recovery efforts. In addition, it established the Commission on Catastrophic Wildfire Cost and Recovery within the Office of Planning and Research. The commission consists of five appointed members with specified expertise and is required to hold at least four public meetings throughout the state relating to the costs of damage associated with catastrophic wildfires. In 2019, the commission, in consultation with the Public Utilities Commission (PUC) and the Insurance Commissioner, prepared a report containing its assessment of the issues surrounding catastrophic wildfire costs and the reduction of damage and making recommendations for changes to law that would ensure equitable distribution of costs among affected parties.

E. Minimizing Displacement and Ensuring Accessibility

HCD develops all programs with the intent to minimize displacement of persons or entities, following its Residential Antidisplacement and Relocation Assistance Plan (RARAP) in accordance with 24 CFR part 42.325. All policies and procedures, applications, and technical assistance provided will include policies around displacement. HCD will minimize displacement of persons or entities as a result of the implementation of CDBG-MIT projects by ensuring that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR part 24) and §104(d) of the Housing and Community Development Act of 1974 and the implementing regulations at 24 CFR part 570.496(a). All programs outlined in this Action Plan will be implemented with the goal of minimizing displacement of families from their home, whether rental or owned, and/or their neighborhoods. In the event a housing program is implemented with CDBG-MIT funds, HCD may consider relocation and rebuilding of some communities due to their proximity to sensitive ecological areas, such as forests, cliffs, mountainsides, and valleys, or those that are at high risk for future impacts, if necessary and reasonable, and if it does not cause undue hardship to citizens or the environment. Relocation efforts would require substantial coordination with local jurisdictions and community members to minimize displacement. For any program under this Action Plan, HCD will coordinate with HUD-certified housing counseling organizations to ensure that information and services are made available to both renters and homeowners as appropriate and/or required.

The relocation assistance requirements at § 104(d)(2)(A) of the Housing and Community Development Act and 24 CFR part 42.350 are waived to the extent that they differ from the requirements of the URA and implementing regulations at 49 CFR part 24, as modified by the Notice, for activities related to disaster recovery. Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation).

The impacts of the disasters are vast and, in many cases, have destroyed homes. In the instance that homes may be rehabilitated, HCD will opt for rehabilitation to minimize the displacement of the homeowner. Additionally, the required affordability periods of 15 and 20 years for multifamily rental units will also assist with prevention of displacement.

⁶⁵ California Legislative Information. Senate Bill- 901 Wildfires (2017-2018)
https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB901

F. 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. Since the mid-1980s the state has promoted “defensible space” for homeowners living in fire prone areas. In 1993, the nonprofit California Fire Safe Council was established to promote fire safety and to support local community fire safe councils. In 2005, a comprehensive set of state legislation passed to require homeowners to maintain defensible space and established local Fire Safe Councils. At the same time the WUI codes were adopted requiring local jurisdictions’ zoning comply with the state’s standards.

1. Wildland-Urban Interface Requirements

The WUI is the area where structures meet or intermingle with undeveloped wildland vegetation. These structures are vulnerable to fire damage, as they are close to fire hazards. In 2003, the California State Fire Marshal, in consultation with the Director of Forestry and Fire Protection and HCD, was tasked with developing statewide fire protection requirements for roofs, exterior walls, structure projections, and structure opening of buildings located in WUI Fire Areas. These requirements became fully effective in 2007, and all new homes built must meet these building requirements.

Through a collaborative effort of the California Department of Forestry and Fire Protection, Office of the State Fire Marshal, local fire districts, building associations and other public safety organizations, the WUI codes have been developed to encourage ignition resistant construction in California’s fire prone areas. The codes include specific material, design, and construction standards to maximize ignition resistance.

The WUI codes are a requirement for new buildings in Fire Hazard Severity Zones in State Responsibility Areas (where the state is primarily responsible for the prevention and suppression of forest fires) and otherwise adopted at the discretion of local districts responsible for their own fire protection. A majority of impacted areas are located in State Responsibility Areas.

Building standards include specific regulation of materials and design for roofing, attic ventilation, exterior walls, decking, and underfloor. WUI regulations also require that homeowners clear flammable vegetation within 30 feet of buildings and modify vegetation within 100 feet around buildings to create a defensible space for firefighters to safely protect vulnerable property and to reduce fuels by which fire may continue to grow or spread.

In accordance with the Federal Register Notice requirement, HCD must support the adoption and enforcement of modern and/or resilient building codes and mitigation of hazard risk for structures located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any WUI Fire Area designated by the enforcing agency. The following maps show the fire hazard areas for the counties impacted by the DR-4344 and DR-4353 disasters.

2. California Fire Safe Councils

The California Fire Safe Council (CFSC) was formed in 1993. It leads and coordinates grassroots efforts that seek to ensure communities can adapt to fire risks. As a statewide non-profit, the CFSC receives federal grant funding from the US Forest Service, National Park

Service, and the Bureau of Land Management. The funds are made available to local Fire Safe Councils and other organizations in California through their online Grants Clearinghouse site.⁶⁶ The function of the Clearinghouse site is to improve relationships between local communities, state, and federal agencies and form new opportunities for relationship building and yielding funding opportunities for eligible organizations.

Since 2008, the CFSC has funded more than 850 grants, over \$81 million worth of projects, to reduce hazardous fuels, educate communities on wildfire prevention, and crafting Community Wildfire Protection Plans and risk assessments. In 2017, 21 projects were chosen for the Grants Clearinghouse funding process. The selected projects were given access to \$2.1 million in federal grant funding with the aim to aid wildfire risk reduction in vulnerable communities across 15 counties in California.

⁶⁶ California Fire Safe Council Grants Clearing House. Available at: <https://cafiresafecouncil.org/grants-and-funding/apply-for-a-grant/>

The following figure indicates the number of grants and total value of projects made available to local Fire Safe Councils from 2008 to 2017.

TABLE 37: FIRE SAFE COUNCIL GRANTS

Year	Total Value of Projects	Number of Grants
2008	\$5,281,04	77
2009	\$17,791,675	160
2010	\$20,874,237	158
2011	\$8,950,627	81
2012	\$5,437,783	52
2013	\$4,937,941	53
2014	\$4,028,427	38
2015	\$3,358,081	25
2016	\$2,149,999	20
2017	\$2,100,000	21
Total	\$74,909,824	685

Source: 2018 California State Hazard Mitigation Plan, Section 8.1, Page 556

HCD conducted outreach to Fire Safe Councils in DR-4344 and DR-4353 impacted jurisdictions to understand local fire mitigation needs and capacity and to gain context about local mitigation activities. The figure below captures the feedback provided by the Fire Safe Councils.

TABLE 38: FIRE SAFE COUNCILS PROGRAM RECOMMENDATIONS

County Fire Safe Council	Program Suggestions
Butte Fire Safe Council	<ul style="list-style-type: none"> Biomass infrastructure for biowaste Forest Health Restoration projects
Mendocino Fire Safe Council	<ul style="list-style-type: none"> Chipper program Projects targeting LMI
Sonoma Fire Safe Council	<ul style="list-style-type: none"> Funding for fulltime and part time staff Fund projects with Safety, Environment, and Property in mind
Napa Fire Safe Council	*No response was captured
Napa County Fire Department	<ul style="list-style-type: none"> Fuel breaks around WUI
Yuba Fire Safe Council	<ul style="list-style-type: none"> Defensible space Chipping program
Ventura Fire Safe Council	<ul style="list-style-type: none"> Home ignition Zone assessments
San Diego Fire Safe Council	<ul style="list-style-type: none"> Home Hardening Cost share
Orange Fire Safe Council	<ul style="list-style-type: none"> Community Education Defensible Space

Additionally, each of the FSCs were asked to rank the type of projects from most needed to least needed in each of their communities from the following list:

- Home hardening
- Forest and watershed health projects (such as fuel breaks)
- Wildland Urban Interface
- Defensible space

The FSCs identified home hardening as the top ranked project of most need, followed by forest and watershed health projects, and WUI rounding out third most needed project type to mitigate fire risk in their respective areas.

3. Firewise USA

The goal of Firewise USA program is to incentivize and promote local actions that ultimately decrease the likelihood of home loss to wildfire risks. Firewise works to educate homeowners on best practices in preparation for a wildfire. The CFSC connected the Firewise program in its list of local organizations and local FSCs as entities eligible for its grant funding.

The Firewise Community framework is based on 3 concepts:

- Wildland fire staff from federal, state, and local agencies provide communities with information about coexisting with wildfire hazard and provides specific mitigation information for the community area.
- The community conducts a risk assessment and establishes a network of homeowners, agencies, and local organizations.
- The community network identifies and ultimately implements local mitigation solutions.

G. Cost Reasonableness

All construction activities that utilize CDBG-MIT funds must be reasonable and consistent with market costs at the time and place of construction. To comply with this requirement, HCD will follow the procedures outlined in Section VI, Part N of the CDBG-DR Grants Administration Manual (CDBG-DR GAM) to complete and document independent cost estimates (ICE), cost or price analyses, and cost reasonableness determinations within each of its programs. Specific parameters regarding cost reasonableness requirements will also be outlined within policies and procedures on a program-by-program basis. As applicable, more detailed cost verification requirements for Covered Projects are provided, in accordance with Section V.A.2.H. of the FRN, in Section VI, Part A of the CDBG-DR GAM Mitigation Addendum.

IV. Proposed Mitigation Projects and Leverage

As a result of the destructive nature of the wildfires and subsequent flooding, HCD has prioritized mitigation programs that focus on resilient infrastructure and planning activities to bolster capacity of local stakeholders in planning for and mitigating against the continued growing threat of annual extreme wildfires. HCD has consulted the SHMP and local HMPs and met with local stakeholders and local planning organizations, including the Fire Safe Councils, to ensure it promotes and implements local and regional planning and infrastructure considerations that were informed by the Mitigation Needs Assessment.

In coordination with these efforts, HCD has considered bolstering building codes and standards, such as the WUI where fuel reduction and vegetation management needs are of critical importance. Other considerations, such as public roadway improvements and evacuation routes, seismic retrofitting, and eligible communication upgrades, will help local communities address multiple hazards like wildfires and earthquakes. Flooding also impacted communities as a result of the wildfires (manifested as mud and debris flows). Therefore, efforts to align CDBG-MIT activities with, and educate the public on, wildfire- and flood-resilient planning initiatives will help support and promote projects to build in multiple natural disaster mitigation and risk-reduction strategies.

In building a resilient infrastructure, forest and watershed health mitigation programming is also being targeted, which ensures that effective water and forest management systems are implemented to reduce the exposure of vulnerable communities and increase the resilient capacity of most-impacted communities. Lastly, HCD will make funding available within the planning programming to explore home hardening techniques and defensible space that will help low- and moderate-income communities be able to afford wildfire mitigation efforts for people who would otherwise not be able to safeguard their homes. Programming executed by HCD or its subrecipients will comply with all applicable Fair Housing and Civil Rights laws, including the obligation to affirmatively further fair housing and Section 3 of the Housing and Urban Development Act of 1968 (24 CFR part 135), promote more resilient housing, and respond to natural hazard related impacts. HCD will emphasize the MID as target locations for projects and the impacts to LMI households and individuals in order to meet the LMI threshold.

The mitigation activities will:

1. Mitigate risks, especially in vulnerable communities,
2. Advance long-term resilience,
3. Align with other planned capital improvements, and
4. Promote community-level and regional planning for current and future disaster recovery efforts and additional mitigation investment.

HCD will leverage CDBG-MIT funds with other funding provided through federal, state, local, private, and nonprofit sources to generate more effective and comprehensive outcomes. These funding sources include, but are not limited to, CDBG-DR funding, FEMA HMGP funding, and CAL FIRE wildfire grant funding.

A. Mitigation Activities and Allocation of Funds

The primary consideration in developing effective CDBG-MIT programming is the Mitigation Needs Assessment. Programs are developed to address identified hazards, risks, and

vulnerabilities, create more resilient communities, and ensure full compliance with the requirements and objectives outlined in the Federal Register Notice. In addition to addressing identified mitigation needs, the CDBG-MIT funded programs also consider the connection to community lifelines, protecting vulnerable populations, alignment with the SHMP and local mitigation planning efforts, and how programs will provide funding for projects that meet the definition of mitigation activities. Furthermore, CDBG-MIT programs must adhere to eligible CDBG activities, be responsive to CDBG national objectives (including the new Urgent Need Mitigation category), comply with all regulatory guidance issued to HCD, and consider best practices established through similar resilience and preparedness initiatives. In addition, HUD has defined infrastructure projects with a total cost of \$100 million, of which at least \$50 million is CDBG, CDBG-DR, CDBG-NDR, or CDBG-MIT funds, as a Covered Project. HCD does not intend to fund projects that meet the definition of a Covered Project; however, should a mitigation project be expected to cost more than \$100 million, HCD will consult with HUD and ensure the proper procedures are followed.

Grants under the Appropriations Act are only available for activities authorized under Title I of the Housing and Community Development Act of 1974 related to disaster relief, long term recovery, restoration of infrastructure and housing, and economic revitalization in the MID resulting from an eligible disaster. Further, CDBG-MIT funds may not be used for activities reimbursable by or for which funds are made available by FEMA, the US Army Corps of Engineers (USACE), or other federal funding sources.

The allocations for each program are based on the Mitigation Needs Assessment, which identified wildfire, earthquakes, and flooding as the primary hazards. HCD opened the Action Plan and the associated program funding allocations for public comment in March 2020 and completed public comment on April 6, 2020. Appendix B provides a comprehensive list of comments received and HCD's responses.

The total CDBG-MIT allocation for PL 1155-123 is \$88.2 million. HCD has allocated five percent of funding for administrative costs, twenty-five percent for the Resilience Planning and Public Services Program, and the remaining funding to the Resilient Infrastructure Program.

At this time, HCD commits to directing 50 percent of the allocated CDBG-MIT funds to low and moderate income (LMI) individuals or areas in accordance with Section 103 of the Housing and Community Development Act. HCD also commits to directing 50 percent of the CDBG-MIT funds to benefit HUD-identified MID Areas.

TABLE 39: CDBG-MIT ALLOCATION OF FUNDS

Program	Mitigation Need(s) Addressed	Program Allocation	Percentage of Total
Resilient Infrastructure Program	Wildfires, Flood, Earthquakes	\$ 61,379,000	69.6%
Round 1	--	\$ 43,080,000	48.8%
Round 2	--	\$ 18,299,000	20.8%
Resilience Planning and Public Services	Wildfires, Flood, Earthquakes	\$ 22,440,000	25.4%
Planning/Capacity Building	--	\$13,200,000	14.9%
Public Services	--	\$9,240,000	10.5%

Program	Mitigation Need(s) Addressed	Program Allocation	Percentage of Total
Administration	--	\$4,400,000.00	5.0%

1. Method of Distribution

HCD will distribute grant funding to beneficiaries using a subrecipient administered approach whereby subrecipients will engage with HCD to ensure that local mitigation needs are addressed. HCD will establish programs through which subrecipients will submit project proposals for funding. HCD will vet projects for CDBG-MIT compliance and eligibility, ensuring that proposed projects adhere to federal requirements and the requirements set forth in the Action Plan. 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.

2. Criteria to Determine Method of Distribution

HCD assessed its internal capacity as part of the capacity assessment required by the CDBG-MIT Federal Register Notice. The capacity assessment concluded that, with HCD’s organizational and staffing adjustments, HCD has the capacity to administer CDBG-MIT funding. However, given the types of activities likely to result from the identified programs, HCD determined that local governments, nonprofit entities, and other community-based organizations (i.e. subrecipients) are in the best position to carry out activities directly.

To that end, HCD also assessed the capacity of subrecipients and state partners to administer CDBG-MIT funded programs. While state partners are available for support in project evaluation, HCD’s assessment concluded that most subrecipients can operate and manage project-specific funding within the proposed framework of the CDBG-MIT programs.

For those entities who require capacity building, HCD has proposed a track within the Resilience Planning and Public Services Program that would provide subrecipients with the ability to gain expertise, complete planning initiatives, or otherwise be better prepared to manage CDBG-MIT funding prior to submitting a Resilient Infrastructure Program application for grant funding. Additionally, HCD continues to promote regional, long-term planning and will encourage local jurisdictions to work and build capacity together in support of proposing regional-scale projects that could benefit the HUD-identified MID and surrounding areas.

3. Program Allocations

Allocations for the mitigation programs have been developed to address the current and future risks as identified in the Mitigation Needs Assessment of most impacted and distressed areas. As shown in Section III – Mitigation Needs Assessment, the total unmet mitigation needs surpass the CDBG-MIT funds allocated to the state by HUD. HCD based programming decisions on reviews of the SHMP and local mitigation planning documents, consultations from federal, state, and local entities, best available data from multiple sources, including FEMA, CAL FIRE, Cal OES, and fire safe councils, broad engagement with the public and stakeholders, and exhaustive conversations about program typologies and design options to maximize the benefits of the available funding.

Funds for planning and public services were determined based on needs articulated in state and local hazard mitigation planning documents, and through consultations and outreach efforts at

the county and city levels. The state will prioritize activities that benefit vulnerable populations and support subrecipient capacity building relative to community resilience and disaster preparedness. Subrecipients will be considered at the county and municipality levels, according to local hazard mitigation plans, determined needs, and relation to the MID.

Similarly, infrastructure funding is allocated according to needs articulated in state and local hazard mitigation planning documents and through consultations and outreach efforts. The objective of the Resilient Infrastructure Program is to fund a broad range of infrastructure activities that address identified risks and vulnerabilities and create more resilient communities.

While HCD currently does not plan to fund housing programs with the CDBG-MIT allocation, HCD remains committed to addressing the needs of vulnerable and underserved populations, including children, homeless persons, immigrants, persons with disabilities, persons from diverse cultures, persons with chronic medical disorders, persons with limited English proficiency or who are altogether non-English speaking, senior citizens, and transportation disadvantaged persons. HCD acknowledges that it will administer CDBG-MIT grant expenditures in conformity with the Fair Housing Act (42 USC 3601-3619) and implementing regulations, Title VI of the Civil Rights Act of 1964 (42 USC 2000d), and that it will affirmatively further fair housing as applicable to its projects.

B. Mitigation Programs

1. Resilient Infrastructure Program

a) Program Description

HCD proposes a program that will provide local jurisdictions with an expansive and hands-on role in driving local community infrastructure needs that meet the definition of mitigation activities. The Resilient Infrastructure Program allocates \$61,379,000 of CDBG-MIT funding to assist local jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the Mitigation Needs Assessment. The program will promote a range of impactful projects, from fuel breaks in the forest to strategic risk reduction within the Wildland-Urban Interface (WUI) to roadway improvements within densely populated, vulnerable communities. Projects for infrastructure may address risks to a variety of systems and structures to enable continuous operations of critical business and government functions during future disasters and improve responses for human health and safety or economic security. HCD anticipates that the program design will present projects that could overlap across different environments, enabling HCD to determine maximum impact within the MID and surrounding areas.

Potential activities may include (but are not limited to):

- Emergency roadway improvements (ingress/egress and evacuation routes),
- Fuel breaks and fuel reduction measures, some of which may be outlined in local jurisdictions' hazard mitigation plans,
- Watershed management activities as outlined in local jurisdictions' hazard mitigation plans,
- Defensible space,
- Hardening of communication systems,
- Flood control structures,
- Flood drainage measures,

- Alternative energy generation,
- Seismic retrofitting, and/or
- Critical facility hardening.

HCD will consult with the appropriate state agencies to provide subject matter expertise in vetting and evaluating project proposals. These agencies will serve as state partners that support HCD in the development of assessment and selection criteria in evaluating project attributes, such as:

- Effectiveness in mitigating risk to community lifelines,
- Benefits by calculating risk reduction value,
- Risk reduction strategy is designed in a way that is cutting edge, sound, environmentally conscious, and potentially replicable, and
- Ability to leverage other funding sources and ensure state or local resources are considered in looking at a project's continued operation and maintenance.

HCD intends to consult with those state agencies that have subject matter expertise in forest and watershed health programs and experience directly and indirectly completing relevant infrastructure projects to protect life and property. State partner involvement will also provide a level of support to HCD in helping local entities establish and target projects in which these funds can have the greatest impact. HCD will develop a competitive application by which eligible applicants (units of local government) can apply for funding to support projects that reduce risk to the MID.

Policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility and specific eligible and ineligible costs. The policies and procedures will establish the metrics and/or indicators that HCD will use in assessing proposed projects' effectiveness in mitigating risk to community lifelines and risk reduction value.

This program may build off, but not supplant, other state agencies' existing programs that seek to reduce fire risk statewide. HCD will focus on implementation of projects in the MID that meet CDBG-MIT criteria.

Local jurisdictions will have the opportunity to submit project applications for Resilient Infrastructure Program funding. Local governments will also be eligible to respond to NOFAs. The application will require local entities to provide evidence of sufficient capacity in implementing one or more resilient infrastructure projects. HCD will create two rounds of funding under the Resilient Infrastructure Program.

Round One: The first round will make CDBG-MIT funding available to local projects that have completed designs, are already moving forward in initial design stages, or can exhibit some level of "shovel-readiness." In addition, the first round will serve jurisdictions that can demonstrate prior experience in implementing risk reduction projects of scale and scope similar to what they are proposing. Local jurisdictions that are not able to present shovel ready projects and exhibit a minimum standard of capacity for Round One project funding will be afforded an opportunity to complete relevant planning initiatives and build capacity through the Resilience Planning and Public Services Program. Once eligible applicants are able to present fully developed project proposals and demonstrate a proper level of capacity, they would be eligible to apply for

funding to implement their mitigation project. HCD anticipates the majority of Round One projects to be implemented, completed, and have met a National Objective within the first six years of the grant period.

Round Two: Funds are being reserved for a second round of applications to serve eligible applicants that require additional time to present fully developed project proposals and demonstrate sufficient capacity. Due to method of distribution by rounds, this program will remain active over the course of the entire grant period to ensure eligible jurisdictions in the MID that require time for planning activities and need capacity building support can implement projects of similar risk reductive impact in comparison to jurisdictions ready to implement projects during Round One. HCD will establish additional evaluation criteria under Round Two to ensure resilient infrastructure projects from applicants who received capacity building funding are given priority.

The Resilient Infrastructure Program will assist in the development of priority projects within the local entities' hazard mitigation plans or similar planning documents that have either been on hold or shelved due to a lack of resources needed to fully fund the project. In establishing priorities and analyzing data under the Mitigation Needs Assessment, HCD identified projects under multiple programs (e.g. Hazard Mitigation Grant Program and California State Fire Safe Council programs) where a lack of available funding may be inhibiting risk reduction projects from completion. In this sense, the CDBG-MIT dollars used here will most likely play a pivotal role in being the final funding piece on critical projects to enable their implementation. While the leveraging of funds may be an evaluation criterion, it is not considered a minimum requirement for project approval. HCD will consider additional criteria, such as benefits to vulnerable populations, location in the MID or direct benefit to a MID, and mitigation outcomes, as primary factors in project selection.

b) Eligible Activity(ies)

- HCDA Section 105(a)(1) – Acquisition of Real Property
- HCDA Section 105(a)(2) – Public Facilities and Improvements
- HCDA Section 105(a)(4) – Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing)
- HCDA Section 105(a)(9) – Payment of Non-Federal Share
- HCDA Section 105(a)(11) – Relocation

The eligible activities above allow for eligible jurisdictions to submit applications for funding based on their individual mitigation needs and address the hazards identified in the Mitigation Needs Assessment. The activities will involve public improvements to forested land, watersheds, and other public land, potential demolition and clearance activities, and local cost share requirements on hazard mitigation projects. Additionally, HCD will incorporate additional waivers and alternative requirements provided in Federal Register Notice 84 FR 45838 regarding additional activity eligibility.

c) National Objective

- Low- to Moderate-Income (LMI) and Urgent Need Mitigation (UNM)

In accordance with 24 CFR 570.208, Section 104(b)(3) of the HCDA, and as further outlined within the waivers and alternative requirements at 84 FR 45838, all CDBG-MIT funded activities must satisfy either the LMI or UNM national objective. All Resilient Infrastructure Program

activities will meet one national objective criterion related to its specific mitigation impact and defined direct benefits or service area. The prioritization criteria below for the Resilient Infrastructure Program will ensure that proposed projects, at a minimum, address how they will affect vulnerable and LMI populations. HCD’s analysis of LMI Summary Data (LMISD) of the MID within the Mitigation Needs Assessment indicates only one MID (the Lake County zip code) as being 51 percent or more LMI. In order to identify activities which may meet the LMI national objective, HCD will require local entities to look at LMISD on a block group level to determine project target areas and whether an LMI area benefit (LMA) exists.

HCD will utilize resources identified within the Mitigation Needs Assessment to aid in project selection (e.g., FEMA HMGP projects currently not awarded⁶⁷, CAL FIRE and Local Fire Safe Council program needs, Community Wildfire Prevention and Mitigation Report, established under the state’s Executive Order N-05-19⁶⁸). These reports and data also consider the identification of vulnerable communities based on socioeconomic characteristics to establish priority projects.

d) Delivery

HCD plans to administer Resilient Infrastructure Program funding in two rounds under two Notices of Funding Availability (NOFAs). As described above, the first round will make CDBG-MIT funding available to local projects that have completed designs, are already moving forward in initial design stages, or can exhibit some level of shovel-readiness. This round serves to incentivize local entities who have actively established priority projects through their local mitigation planning efforts and are ready to implement the full scope of such a project if they had the required funding. The first round will also help in identifying those applicants who may need additional support and capacity building to properly implement a CDBG-MIT activity.

After HCD completes awarding and obligation of funds to approved Round One projects, it will open a second round for local jurisdictions that required additional time to present fully developed project proposals and demonstrate sufficient capacity. The figure below presents the anticipated program launch schedule and funding amount by round. While HCD considers Round One’s current allocation as outlined below, it may reduce and move budgeted funds into Round Two if Round One does not award all budgeted funds to acceptable project applications. In the event a Round One unallocated amount is moved into Round Two to support additional projects, HCD will continue to follow all CDBG-MIT requirements, particularly to ensure the expenditure of 50 percent of the CDBG-MIT allocation within six years of grant agreement execution with HUD.

TABLE 40: PROPOSED FUNDING ROUNDS

Resilient Infrastructure Fund	Approximate Launch Date	Program Allocation
Round 1	Late 2020/Early 2021	\$ 43,080,000
Round 2	Early 2024	\$ 18,299,000

⁶⁷ Discussed in the Mitigation Needs Assessment - O. Long-Term Planning and Risk Mitigation - 1. FEMA HMGP

⁶⁸ State of California Executive Department. Executive Order N-05-19. Available at: <https://www.gov.ca.gov/wp-content/uploads/2019/01/1.8.19-EO-N-05-19.pdf>

Following full program design, HCD will release a NOFA to receive applications from eligible local jurisdictions for consideration under Round One. HCD will encourage local entities to build partnerships on both a state and local level if doing so accelerates the implementation schedule of their project. In this scenario, HCD expects a single entity to submit the project application but to outline the partners' roles and responsibilities within the project description. HCD will evaluate applications once the submission window closes and award selected project applications until either Round One funding is fully obligated or until the next eligible project application no longer meets the minimum standards outlined in the policies and procedures.

The NOFAs will be open to local governments (counties and municipalities).

The Resilient Infrastructure Program will include a maximum award, as a grant, of \$5,000,000 per project. Exceptions to the maximum award amount will be considered on a case by case basis, accounting for the amount of funding needed beyond the award cap, the benefits of the proposed project, and other funding included as leverage, among other factors. Full details on the process for requesting and evaluating exceptions to the maximum award amount will be included in the program policies and procedures. There will be no limit to the number of project applications a local entity can submit; however, no single jurisdiction can receive more than a total of \$10,000,000 in CDBG-MIT funding. Additionally, if a local entity has multiple applications determined to be eligible for funding, HCD will fund those projects pending an assessment of that entity's capacity to implement multiple projects concurrently.

Project applications that are either not funded or do not meet established requirements will be allowed to submit under Round Two. As appropriate, HCD will encourage jurisdictions to take part in the capacity building portion under the Resilience Planning and Public Services Program to ensure proper local implementation, oversight, and compliance with CDBG-MIT requirements. Eligible applicants will receive technical assistance regarding CDBG-MIT requirements, and HCD and its partners will help applicants identify or address both the short-term and long-term mitigation needs, develop and incorporate additional resilience elements in proposed projects, and develop projects that are scalable and replicable.

e) Eligibility

Proposed projects will be assessed by HCD. Specific eligibility criteria include:

- The proposed project must be located in a HUD-designated Most Impacted and Distressed area or be shown to have a demonstrable benefit to a HUD-designated Most Impacted and Distressed area.
- All sources of funding required to complete the project must be identified and secured or readily accessible.
- The proposed project must relate to infrastructure that meets the definition of a mitigation activity.
- The applicant must demonstrate sufficient capacity to manage and operate project specific CDBG-MIT funding.

HCD will create policies and procedures that outline the requirements of the program and rules for specific projects, including additional details regarding eligibility, program deadlines, protocols for demonstrating capacity, and specific eligible and ineligible costs. Selected subrecipients will be required to comply with applicable laws and regulations associated with

Fair Housing, Civil Rights, and Section 3. Requirements will be incorporated into standard agreements with associated penalty language for subrecipients who fail to comply.

Through state partnerships, HCD will encourage local jurisdictions to reach out to their local Fire Safe Councils to coordinate efforts with the goal of maximizing the impacts and identify other funding sources to leverage the CDBG-MIT grant. While specific individuals or homeowners are not eligible to apply directly for funding under this program, local jurisdictions can submit applications which may affect individual homeowners (e.g. defensible space).

f) Prioritization

Prioritization will ultimately occur at the local level through the selection of projects to propose to HCD for funding. HCD will evaluate projects to determine adherence to program requirements and applicable state and federal regulations, the benefit to LMI populations, and the direct benefit to the HUD-designated MID. Additional evaluation criteria include, but are not limited to:

- Identification of the priority project as a mitigation need on the local entity's hazard mitigation plan,
- Establishment of the project as preserving functional use of or reducing risk to a critical lifeline(s),
- Projects that improve resilience for underserved communities and vulnerable populations,
- Leveraging of funding sources,
- The ability of the project to be replicated in other communities,
- CAL FIRE's identification of an activity as a priority project,
- Quantitative data showing a project's anticipated impact on current and future risks, and
- An acceptable operations and maintenance plan, if applicable.

Prioritization criteria are expected to be supported by quantitative assessments and outcomes that show impacts and improvements to LMI, the MID, and community lifelines. Additionally, HCD anticipates conducting technical assistance and outreach prior to the release of the NOFA to ensure all potential applicants understand the criteria for award evaluation and prioritization and the application process.

g) Eligible and Ineligible Costs

CDBG-MIT awards under the Resilient Infrastructure Program may fund costs generally considered eligible within standard CDBG guidelines with consideration given to certain costs typically related to emergency management, disaster response, or disaster preparedness that are not generally eligible for CDBG funding but provide a demonstrable benefit to the community per the definition of a mitigation activity.

Ineligible costs include:

- Repair or replacement of private roads and bridges, and
- Repair, replacement, or relocation of private utilities.

Full details on eligible and ineligible costs will be outlined in the policies and procedures.

2. Resilience Planning and Public Services

a) Program Description

HCD completed individual mitigation needs sessions with interested state and local stakeholders as part of the Mitigation Needs Assessment. As outlined in the assessment, multiple stakeholders indicated a need for public education and awareness related to risks and vulnerabilities and actions that can be taken to be better prepared for future disasters. In addition, stakeholders expressed a desire to conduct planning initiatives that examine how best to prioritize mitigation in future housing, infrastructure, and economic development investments. Projects for planning and public services may address risks to, or across, community lifelines that support human health and safety and provide mitigation for individual and community-based systems. HCD proposes to allocate \$22,440,000 to the Resilience Planning and Public Services program to address these needs.

Planning and public service projects implemented under this program may include, but are not limited to:

- Creation of or updates to Community Wildfire Protection Plans,
- Addition of resilience or safety elements (e.g. evacuation routes or forest and vegetation management) to local comprehensive plans,
- Establishment of mitigation-related outreach and educational campaigns regarding proper disaster evacuation, disaster preparedness, and risk reduction initiatives,
- Additional public services (e.g. health or recreation) or planning that serve to enhance critical lifelines,
- Funding for local governments and non-profit organizations to perform additional services to inform the public on resilient-minded activities,
- Job training that benefits LMI individuals for local entities to build capacity in projects that address community mitigation needs and coordinating partnerships to establish resource leveraging, and
- Code enforcement activities, including training and staffing.

The program allocation will be made available via an application process for subrecipients (i.e. local governments, non-profit entities, and community development organizations) to implement resilience planning and public service projects. In accordance with Section V.A.10 of the Notice (84 FR 45856), HCD will promote expansions of local and regional planning initiatives that would be consistent with those of entitlement communities. The program's scope and budget are consistent with HUD's request in the Notice to ensure planning and education are key components in utilizing this initial allocation of CDBG-MIT dollars.

b) Eligible Activity

- HCDA Section 105(a)(8) – Public Services
- HCDA Section 105(a)(12) – Planning and Capacity Building

Planning activities under the Resilience Planning and Public Services Program may involve the creation or updating of current plans for better alignment with mitigation principles or, in some cases, to examine hazards and establish actions for increasing resilience and preparedness. Entities may also use the funding to increase public services through establishing educational campaigns or local job training initiatives to ensure disaster preparedness is a vital component

of their communities' resilience efforts going forward. To meet community needs and language requirements, funds may be used to support language access services and effective communication strategies for persons with disabilities. The eligible activities above allow for regional or local jurisdictions and nonprofit organizations to submit appropriate applications for funding based on their individual mitigation needs as outlined within the Mitigation Needs Assessment. Additionally, HCD will incorporate additional waivers and alternative requirements in Federal Register Notice 84 FR 45838 regarding additional activity eligibility.

c) National Objective

- Low- to Moderate-Income (LMI), Urgent Need Mitigation (UNM), and N/A (planning)

In accordance with 24 CFR 570.208, Section 104(b)(3) of the HCDA, and as further outlined within the waivers and alternative requirements at 84 FR 45838, all CDBG-MIT funded activities must satisfy either the LMI or UNM national objective. Furthermore, the Notice (84 FR 45856) describes planning efforts as addressing the national objectives without the limitation of any circumstances.

d) Delivery

Local jurisdictions and nonprofit organizations that work within or impact the MID will submit planning and public services projects to HCD for funding consideration under a NOFA. HCD will review and approve project applications, ensuring compliance with policies and procedures and applicable state and federal regulations. Applications should demonstrate ability to comply with applicable laws and regulations associated with Fair Housing, Civil Rights, and Section 3 in project delivery. Once HCD evaluates all submitted applications, awards will be made until no remaining funding is available within the program budget. Maximum awards per project under this program will be capped at \$500,000. Exceptions to the maximum award amount will be considered on a case by case basis, accounting for the amount of funding needed beyond the award cap, the benefits of the proposed project, and other funding included as leverage, among other factors. Full details on the process for requesting and evaluating exceptions to the maximum award amount will be included in the program policies and procedures. There will be no limit to the number of project applications an entity can submit; however, no single entity can receive more than a total of \$2,500,000 in CDBG-MIT funding under this program.

HCD anticipates completing most of the work under this program within the first six years after execution of its grant agreement with HUD. HCD will ensure flexibility in identifying and prioritizing the projects that provide the most mitigation benefits, while also adhering to HUD requirements for this grant. HCD will monitor and provide technical assistance to its subrecipients throughout program implementation and prior to release of the NOFA.

e) Eligibility

Proposed projects will be assessed by HCD. Specific eligibility criteria include:

- The proposed project must be located in a HUD-designated Most Impacted and Distressed area or be shown to have a demonstrable benefit to a HUD-designated Most Impacted and Distressed area.
- All sources of funding required to complete the project must be identified and secured or readily accessible.

- The proposed project must relate to planning or public services that meets the definition of a mitigation activity.
- The applicant must demonstrate sufficient capacity to manage and operate project specific CDBG-MIT funding.

HCD will create policies and procedures that outline the requirements of the program and rules for specific projects, including additional details regarding eligibility, program deadlines, protocols for demonstrating capacity, and specific eligible and ineligible costs.

The NOFA will be open to local governments and local or regional non-profit organizations who assist in mitigation planning and disaster preparedness efforts.

Because resources do exist within the state to address planning efforts, including within HCD, additional technical assistance to applicants and coordination with other state and local partners will ensure there is no duplication of benefits. While local stakeholders have indicated the need for planning dollars, HCD will ensure that potential applicants have exhausted all other avenues of funding prior to receiving an award from this program.

f) Prioritization

Evaluation criteria under this program will primarily focus on LMI benefit and MID requirements, but will also consider other criteria, as listed below. Prioritization criteria are expected to be supported within applications by quantitative assessments and outcomes that show impacts and improvements to LMI, the MID and community lifelines.

- Impact of planning or public service effort within the community (as indicated by past disasters),
- The project's ability to reduce risk and loss of life and property during future disasters,
- Projects that improve resilience for underserved communities and vulnerable populations, and
- Leveraging of additional funding sources.

In addition to the prioritization criteria above, HCD will consider awards for funding under this program to local entities who are attempting to build capacity for implementing projects under the Resilient Infrastructure Program. Also, by supplementing planning efforts for these entities, HCD hopes to build upon an applicant's resilient infrastructure initiative. For example, a subrecipient awarded funding under the Resilient Infrastructure Program for roadway improvements may also receive specific prioritization for a public service project under this program to ensure the surrounding community knows its evacuation routes for future disasters.

The policies and procedures will outline all evaluation and prioritization criteria prior to the application submission period. Additionally, HCD, anticipates conducting technical assistance and outreach prior to the release of the NOFA to ensure potential applicants understand the application requirements, award prioritization and application process.

g) Eligible and Ineligible Costs

CDBG-MIT awards under the Resilience Planning and Public Services Program may fund costs generally considered eligible within standard CDBG guidelines, with consideration given to certain costs typically related to emergency management, disaster response, or disaster

preparedness that are not generally eligible for CDBG funding but provide a demonstrable benefit to the community per the definition of a mitigation activity.

According to the Notice, mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Full details on eligible and ineligible costs will be outlined in the policies and procedures.

C. Operations and Maintenance

Through its implementation of CDBG-MIT programs, HCD will plan for the long-term operation and maintenance of infrastructure and public facilities funded with CDBG-MIT funds. The Notice allows for flexibility in the use of program income to address operations and maintenance of mitigation projects. Eligible uses include repair, operation, and maintenance of publicly owned projects financed with CDBG-MIT funds. HCD will request an appropriate waiver in order to utilize such funds, as appropriate.

HCD will meet the following requirements within its policies and procedures on a program-by-program basis, including specific milestones to ensure operations and maintenance requirements are met:

- State or local resources will be identified for the operation and maintenance costs of projects assisted with CDBG-MIT funds.
- If operations and maintenance plans are reliant on any proposed changes to existing taxation policies or tax collection practices, those changes and relevant milestones will be expressly addressed.
- Any public infrastructure or facilities funded with CDBG-MIT resources will illustrate their ability to account for long-term operation and maintenance needs beyond an initial investment of CDBG-MIT funds.

V. Community Participation and Public Comment

The following citizen participation plan has been developed in compliance with 24 CFR §91.115 and applicable HUD requirements to enumerate citizen participation policies and procedures as they relate to this Action Plan, intended to maximize the opportunity for citizen involvement in the planning and development of the California CDBG-MIT program—including proposed program activities and amount of funding.

HCD has prioritized a robust citizen participation process to ensure all citizens and stakeholders are provided the opportunity to contribute to and understand the mitigation process. The stakeholders include county and city officials, local emergency management departments, and community development organizations. Not surprisingly, the outreach with stakeholders has continued to reinforce the understanding that wildfires and flooding remain an ever-present danger that stakeholders want mitigated. Conversations with state-level stakeholders concentrated on the need for more fire mitigation infrastructure (fuel breaks, forest health, fuel reduction measures). Conversations with local stakeholders echoed the state agency fire mitigation recommendations as well as highlighted the need for roadway improvements and investment in flood infrastructure. Both state and local level outreach identified the need for more community outreach and education around fire preparedness and highlighted updating planning documents to guide mitigation efforts.

A. Public Hearings

Based on California's CDBG-MIT award receipt of less than \$500 million, the Notice requires the State of California to hold two public hearings in different locations. The first, during Action Plan development, and the second during the public comment period. HCD conducted extensive public and stakeholder outreach in direct coordination with impacted local governments and California Office of Emergency Services (Cal OES); the meetings are detailed in Appendix A. In its two rounds of stakeholder and public meetings, HCD presented program information for comment by stakeholders and the public. HCD held Round I of public meetings during Mitigation Plan development to provide both an overview of the Mitigation Plan process and collect input from impacted citizens and community leaders. Feedback received in Round I informed the draft Mitigation Action Plan.

HCD staff traveled across the state and visited each of the HUD-identified Most Impacted and Distresses areas. HCD, as well as its local government partners publicized all public hearings in the applicable jurisdictions. Reasonable accommodation language and opportunities for translation or interpreter services were provided in all publications and meeting notices. All requests received were accommodated. HCD also created summary memos of CDBG-MIT funding and proposed programs and provided Spanish translated versions of these documents and meeting presentations to each meeting attendee. All meeting venues were selected in accordance with physical accessibility standards.

The Round I series of meetings commenced on January 8, 2020 and concluded on January 23, 2020 included a total of 171 meeting attendees. The first round of meetings included:

1. Round I

- a. January 8, 2020 – Mendocino County, County of Mendocino Administration Center, Ukiah, CA 95482
6 P.M – 8 P.M

Attendees: 22

- b. January 9, 2020 – City of Santa Rosa, City of Santa Rosa Utilities Field Operations Center
6 P.M – 8 P.M
Attendees: 46
- c. January 13, 2020 - Yuba County, Yuba County Board of Supervisors Chambers
Yuba City, CA
6 P.M – 8 P.M
Attendees: 17
- d. January 21, 2020 – City and County of Los Angeles, Los Angeles County Development Authority, Alhambra, CA
6 P.M – 8 P.M
Attendees: 27
- e. January 22, 2020 - Ventura County, City of Ventura City Council Chambers
6 P.M – 8 P.M
Attendees: 59

At these meetings, participants were given a brief overview of the proposed program with an opportunity to ask any questions that they may have of staff. Most meetings were open dialogue with local government officials, community leaders, and nonprofit organizations asking questions and HCD staff providing responses.

The following provides a summary of the key themes that were raised in the Round I January 2020 stakeholder meetings within each impacted community:

- **Federal Register Notice Requirements** – Attendees questioned and clarified the requirements set forth in the Federal Register Notice such as Low to Moderate Income benefit, the Mitigation Needs Assessment, and clarifying the geographies benefitting from the funds.
- **Funding timeline** – Clarification on when the CDBG-MIT funding will be available.
- **Mitigation** – Attendees posed questions on the types of projects that would qualify as mitigation and used by funds.
- **Allocation Methodology** – Local government representatives questioned the methodology of distribution for the various proposed programs and how it is translated into their community.
- **Owner Occupied Program** - Homeowners in attendance questioned the timeline and eligibility of the Owner-Occupied program.

Round II

The Round II CDBG-MIT public meetings commenced on March 4, 2020 and concluded on March 23, 2020 included a total of 97 meeting attendees. Due to COVID-19, the Department of Housing and Community Development changed the March 18 and 23, 2020 public meetings to

online only events due to restrictions on public gatherings. The second round of meetings included:

- a. March 4, 2020 – City of Ventura and Ventura County, County Government Center, Hall of Administration, Board of Supervisors Hearing Room and Training Room, 800 S. Victoria Avenue, Ventura, California 93009
6 P.M – 8 P.M
Attendees: 32
- b. March 5, 2020 – City of Santa Barbara, Santa Barbara County, County Board of Supervisor Hearing Room & Supervisors Conference Room, 105 E Anapamu St # 406, Santa Barbara, CA 93101
6 P.M. – 8 P.M.
Attendees: 18
- c. March 9, 2020 – City of Napa, Napa County, Napa Senior Center, 1500 Jefferson Street, Napa, CA 94559
6 P.M. – 8 P.M.
Attendees: 4
- d. March 18, 2020 – City of Santa Rosa, Sonoma County, online-only event.
6 P.M. – 8 P.M.
Attendees: 25
- e. March 23, 2020 – Nevada, Butte, and Yuba Counties, online-only event
6 P.M. – 8 P.M.
Attendees: 18

At the Round 2 public meetings, participants were given a brief overview of the proposed CDBG- MIT programs and with an opportunity to ask any questions to HCD staff. Meetings were an open dialogue with local government officials, community leaders, nonprofit organizations, and the general public asking questions and HCD staff responding.

The following provides a summary of the key themes that were raised in the Round II March 2020 stakeholder meetings within each impacted community:

- **Application Process** – What are the eligibility requirements for organizations, how to apply, leverage, and use matching funds.
- **Mitigation Definition** – What are the eligible hazards that would qualify for mitigation under the CDBG MIT Program.
- **Prioritization of CDBG-MIT Projects** – Questions were asked as to how the projects would be prioritized.
- **LMI Requirements** – What are and how to meet LMI requirements.
- **Housing** – How to use funds to address the needs of renters and homeowners.
- **Funding Timeline** – Clarification on when the CDBG-MIT funding will be available and how the funding is awarded.

Interpreters were made available at all CDBG-MIT meetings to assist participants in need of Spanish, English, and native languages translations. HCD accepted comments from citizens, either submitted in writing to the designated email (DisasterRecovery@hcd.ca.gov) or submitted

in writing via public comment card. The Action Plan was posted for public comment for 45 calendar days between February 21 – April 6, 2020 on HCD’s website (<https://www.hcd.ca.gov/community-development/disaster-recovery-programs/cdbg-dr/cdbg-mit-2017/index.shtml>) in English and Spanish and the publication was distributed to local governments, public meetings participants, interested parties, local governments and circulated to key stakeholders as outlined in Appendix B. HCD also posted the following to its CDBG-MIT website to accommodate any reasonable accommodation or additional translation requests: “Persons needing special assistance, or reasonable accommodation, please contact HCD at disasterrecovery@hcd.ca.gov within five working days of any public meeting in order to facilitate the request.” Both the English and Spanish public comment drafts of the CDBG-MIT Action Plan posted to HCD’s website were 508 compliant. Only public comments submitted during the formal public comment period are addressed in Appendix B. If, based on public comment, there is a substantial amendment to the Action Plan, citizens will be provided a minimum of 30 days to provide public comment on the amended Action Plan.

B. Local Government Consultation

The following provides summary of the key themes that were raised in the November and December 2019 briefings with local government stakeholders from all impacted counties, including local government officials and elected officials. A total of ten local governments were consulted across city and county levels. Departments represented included housing, emergency management, fire, planning, public works, and community development. The themes collected over the course of these meetings are as follows:

- **Organizational Capacity** – Local government staff expressed concern with undertaking the administrative and operational capacity to carry out mitigation programs and projects. Identifying most readily available and proposed mitigation projects that may utilize the mitigation funds.
- **Low-to-Moderate Income** – Concern that household income limitation and requirements are too low and unrealistic for the impacted areas.
- **Wildfire Mitigation** - Stakeholders identified areas and projects of highest concern in regard to wildfire mitigation within their communities. Need for additional financing for both shovel ready and pipeline projects.
- **Allocation Methodology** – Stakeholders inquired about the methodology of how funds will be distributed.

HCD also conducted two presentations to impacted jurisdictions and elected officials. The first briefings were held on January 3, 2020 with 20 participants via online webinar. The second briefing took place on February 20, 2020 and included 16 local government participants via webinar.

C. Citizen Complaints

HCD will provide a timely response to citizen complaints. Citizens may file a written complaint or appeal through the Disaster Recovery email: DisasterRecovery@hcd.ca.gov or to HCD’s Director of Disaster Recovery: Maziar.Movassaghi@hcd.ca.gov. Citizens may also submit complaints by postal mail to the following address:

ATTN: Maziar Movassaghi
Director of Disaster Recovery
Housing & Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

The response will be provided within fifteen working days of the receipt of the complaint, if practicable.

To submit fair housing complaint, contact one of the following:

- U.S. Department of Fair Housing and Equal Opportunity (FHEO)
 - Phone:
 - (415) 489-6524
 - (800) 347-3739
 - (415) 436-6594 TTY
 - Email: ComplaintsOffice09@hud.gov
- California Department of Fair Employment and Housing (DFEH)
 - Phone:
 - 800-884-1684
 - 800-700-2320 TTY
 - California's Relay Service at 711
 - Email: contact.center@dfeh.ca.gov

D. Citizen Advisory Committee

In accordance with the Notice (84 FR 45856), HCD will develop a Citizen Advisory Committee (CAC) that convenes no less than twice annually to review the mitigation needs of California. The CAC will provide an opportunity to solicit and respond to public comments about ongoing HCD mitigation activities, and to inform future CDBG-MIT programs and activities.

VI. Grant Management

The following sections provide an overview of HCD's capacity for managing federal grants and the integration of the CDBG-MIT allocation into its systems. Further details of all grant administration and financial management functions are outlined in the Certifications and Implementation Plan, the CDBG-DR Grants Administration Manual (GAM), and the CDBG-DR GAM Mitigation Addendum (CDBG-MIT GAM Addendum).

A. Financial Management

HCD is the responsible entity for all administration of CDBG-MIT funds for the State of California. Currently, HCD has eight divisions:

- Administration and Management
- Audit & Evaluation
- Codes and Standards
- Executive
- Financial Assistance
- Housing Policy
- Legal Affairs
- Legislation

The Division of Financial Assistance (DFA) manages federal programs for HCD through its Federal Programs Branch. For purposes of managing CDBG-MIT funds, HCD will build out capacity within the Disaster Recovery (DR) Section under DFA. The DR Section will have full time staff dedicated to the administration of the CDBG-MIT grants including staff overseeing all financial management, data management, and reporting requirements for the grant. The DR Section Mitigation staff will work with the Accounts Payable staff to ensure all grant payments are made in a timely manner and in adherence to all federal and state regulations.

1. Internal Controls

To ensure it has the capacity required to administer the CDBG-MIT and CDBG-DR appropriations, HCD is hiring new staff to manage mitigation programs and building out support staff positions for compliance and administrative functions to streamline management of all federal grants. As HCD builds its capacity for all CDBG-DR allocations, internal controls for grants remain the same. For invoice or request for payment submitted to HCD, the program and operational staff will review transactions for programmatic and fiscal compliance.

2. Standard Agreement

HCD's Standard Agreement is the contractual document that details the financial and recordkeeping requirements and standards for entities awarded funds to carry out specific eligible activities. By executing HCD's Standard Agreement, the subrecipient agrees to comply with all federal and state statutes, regulations, and rules that apply to the CDBG-MIT activities, as well as the requirements listed within the contract, in exchange for receiving the grant for the awarded activities.

DR Section staff responsible for administering mitigation programs and awards will provide oversight on Standard Agreements and subrecipients to ensure compliance as required by the

grant and contract and provide technical assistance as necessary to support projects through completion.

3. Reimbursement Payments

HCD operates on a reimbursement basis for all CDBG-DR and CDBG-MIT projects. All costs must be incurred and paid for by the subrecipient prior to HCD providing a 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. 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 systems of record for the state and HCD.

Processes for monitoring expenditures of subrecipients and payment processing are outlined in the GAM.

4. Program Income

In some circumstances, CDBG-MIT funded activities may generate program income. If a subrecipient's activities generate program income, it may only be used for eligible project or administration costs related to the awarded project before additional grant dollars are expended. Any income generated by a subrecipient must be reported to HCD on a regular basis, as detailed in the Standard Agreement between HCD and the subrecipient. HCD reports all program income to HUD through the DRGR.

Further details on how program income is managed and reported on by subrecipients and HCD is provided in the GAM.

5. Timeliness of Expenditures

At a minimum, HCD ensures timeliness with subrecipients and on projects in the following ways:

- Include start and end dates in all contracts,
- Include performance benchmarks that include projected expenditures in all contracts,
- Review and process expenses against eligible reimbursements provided by subrecipients and draw down expenditures in Grants Network and DRGR on a monthly reimbursement basis. This allows for internal monitoring of expenditures and ensures that funds are drawn within the system without delay or a lapse in time, and
- Monitor the progress of activities in order to address any delay in production.

For stalled activities, subrecipients submit an updated work plan designed to get the activity back on track so that funds can be drawn down, as outlined in the Standard Agreement performance measures. If an acceptable work plan cannot be prepared, HCD reallocates funds to other eligible projects through the use of an Amendment to the Action Plan.

B. Records Management

Records are maintained in accordance with 24 CFR part 570.490. Records are kept to document compliance with program requirements, with federal, state, and local regulations, and to facilitate audit review by HUD. CDBG-MIT records are subject to the Freedom of Information Act (FOIA) and California Access to Public Records.

Policies and procedures for file security, protection of Personally Identifiable Information, access to records, and retention can be found in the GAM.

VII. Administration and Planning

A. Application Status

HCD is responsible for the implementation of the CDBG-MIT programs and projects, including the means of communicating with program applicants. HCD is not proposing to implement programs directly at this time and will provide awards to subrecipients for them to directly manage and operate project funding. HCD will require commitments from its subrecipients under the Resilience Planning and Public Services programs to maintain regular applicant communication (where applicable) and to share timely and accurate information throughout the lifecycle of the program. HCD will include standard communication requirements in the notices of funding availability and within the Standard Agreement, as applicable, for subrecipients. The system of record for HCD's grant administration, Grants Network, also has built in messaging and communication functions that HCD and subrecipients can use to track applicant status and information.

To ensure effective communication, most notably within some public services activities, HCD will require that subrecipients, at a minimum, gather information from each beneficiary during the intake process that will be used for communication purposes. These communication methods include:

- Mailings to the damaged and current mailing addresses (as applicable),
- Emails to primary and secondary email addresses, and
- Phone calls to primary and secondary phone numbers.

Additionally, HCD uses the CDBG-MIT page on its website to share overall grant updates, publication of the Action Plan and action plan amendments, and critical grant communications. HCD will include hyperlinks to subrecipient websites specific to mitigation public service projects so that potential applicants can learn more about these programs. Subrecipients' websites for programs that are applicant-based will be required to include a link to submit contact information so that potential applicants can receive more information about programs for which they may qualify.

HCD and its subrecipients will ensure applications are accessible to all parties by following Section 504 of the Rehabilitation Act as it applies to communication and program accessibility requirements. Applicants with Limited English Proficiency who require translation or interpretation services are provided these services in accordance with HCD's Language Assistance Plan (LAP). Subrecipients who are implementing CDBG-MIT programs which may benefit individuals must have a LAP or adopt HCD's LAP. Furthermore, local governments must provide status updates and program materials in a format that is in accordance with the Americans with Disabilities Act (ADA) and Section 508 of the Rehabilitation Act.

1. Applicant Review

If any Mitigation program allows for direct applications, the Representative II (Mitigation) and Manager I (Program Implementation) will develop an AFWA process for each applicant receiving funds. The full AFWA process will be outlined in the program manual.

B. Program Budget

HCD commits to spending the CDBG-MIT allocation of \$88 million within the timeline required by the Notice. As outlined in Section V above, the allocations for each program are based on the Mitigation Needs Assessment, which identified wildfire, earthquakes, and flooding as the primary hazards. The grant has been allocated as shown in the figure below.

TABLE 41: CDBG-MIT FUNDING SUMMARY

Total CDBG-MIT Funds	\$88,219,000
Administration	\$4,400,000
Program Allocations	\$83,819,000
<i>Resilient Infrastructure Program</i>	<i>\$61,379,000</i>
<i>Resilience Planning and Public Services</i>	<i>\$22,440,000</i>

Appendix A – Public Consultations

Date	Contact Type	Meeting	Purpose	Parties Represented
10/18/2019	Stakeholder Outreach	Kick off	HCD, CAL OES, CAL FIRE, and GCR discussed overview of CDBG-MIT requirements. Included State Hazard Mitigation Officer (SHMO).	CAL FIRE, CAL OES, HCD, GCR
11/7/2019	Stakeholder Outreach	CAL FIRE Discussion	Discussion with CAL FIRE about overview of disaster recovery timeline, data needs, existing mitigation efforts and state and local coordination.	CAL FIRE, GCR
11/15/2019	Stakeholder Outreach	California Fire Safe Council (CFSC) Discussion	Discussion of home hardening work as it relates to AB 38 work, HCD's HMGP application for a pilot project for home hardening in conjunction with owner occupied reconstruction in the 2017 disaster area; and Implementation of the CDBG-DR Mitigation funds.	CAL FIRE, CFSC, HCD, GCR
12/2/2019	Stakeholder Outreach	OPR Discussion	Discussion with OPR on CDBG Mitigation overview and role of state polices and planning.	OPR, GCR
10/24/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Santa Barbara County	Santa Barbara County GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Santa Barbara County, HCD, GCR

Date	Contact Type	Meeting	Purpose	Parties Represented
10/25/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Mendocino County	Mendocino County GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Mendocino County, HCD, GCR
10/29/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Los Angeles County, City of Los Angeles	Los Angeles County and City of Los Angeles, GCR and HCD discussion remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Los Angeles County, City of Los Angeles, HCD, GCR
10/29/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Butte County	Butte County GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Butte County, HCD, GCR
11/1/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Yuba County	Yuba County GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Yuba County, HCD, GCR
11/1/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: City of Santa Rosa	City of Santa Rosa GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	City of Santa Rosa, HCD, GCR
11/6/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: City of Clearlake	City of Clearlake GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	City of Clearlake, HCD, GCR

Date	Contact Type	Meeting	Purpose	Parties Represented
11/14/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: City of Ventura, Ventura County	City of Ventura, Ventura County, GCR, and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	City of Ventura, Ventura County, HCD, GCR
11/22/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Napa County	Napa County GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Napa County, HCD, GCR
11/22/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: San Diego County	San Diego County, GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	San Diego County, HCD, GCR
11/22/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Nevada County	Nevada County, GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Nevada County, HCD, GCR
11/26/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Sonoma County	Sonoma County, GCR and HCD discussion of remaining needs from 2017 wildfires, future mitigation needs, proposed programs and next steps.	Sonoma County, HCD, GCR
12/2/2019 and 12/6/2019	Stakeholder Outreach	Consultation: California Governor's Office of Planning and Research	Governor's Office of Planning and Research, GCR and HCD discuss current mitigation planning efforts.	OPR, HCD, GCR

Date	Contact Type	Meeting	Purpose	Parties Represented
12/3/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: City of Napa	City of Napa, GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	City of Napa, HCD, GCR
12/3/19	Stakeholder Outreach	N/A	Reach out to United States Forest Service (USFS) staff to discuss CDBG-MIT	N/A
12/6/2019	Stakeholder Briefing	Stakeholder Briefing Webinar: Orange County	Orange County, GCR and HCD discussion of remaining needs from 2017 wildfires and mitigation needs, proposed programs and next steps.	Orange County, HCD, GCR
12/9/2019	Stakeholder Briefing	Stakeholder Briefing: FEMA Region IX	Provide overview of CDBG-MIT action plan requirements and current programming options.	FEMA, HCD, GCR
12/12/2019	Stakeholder Briefing	Stakeholder Briefing: CAL OES, SHMO	Brief SHMO on CDBG-MIT programming options and mitigation needs assessment.	CAL OES, HCD, GCR
12/12/2019	Stakeholder Briefing	Stakeholder Briefing: CAL FIRE	Brief CAL FIRE staff on mitigation needs assessment, consultations to date, and draft programming options.	CAL FIRE, HCD, GCR
1/8/2020	Public Meeting	Round 1 Public Meeting: Mendocino County	HCD provided CDBG-MIT overview and proposed mitigation programs for impacted households and general public.	General Public, HCD, GCR
1/9/2020	Public Meeting	Round 1 Public Meeting: Sonoma County and City of Santa Rosa	HCD provided CDBG-MIT overview and proposed mitigation programs for impacted households and general public.	General Public, HCD, GCR

Date	Contact Type	Meeting	Purpose	Parties Represented
1/13/2020	Public Meeting	Round 1 Public Meeting: Yuba County	HCD provided CDBG-MIT overview and proposed mitigation programs for impacted households and general public.	General Public, HCD, GCR
1/21/2020	Public Meeting	Round 1 Public Meeting: Los Angeles County and City of Los Angeles	HCD provided CDBG-MIT overview and proposed mitigation programs for impacted households and general public.	General Public, HCD, GCR
1/22/2020	Public Meeting	Round 1 Public Meeting: Ventura County and City of Ventura	HCD provided CDBG-MIT overview and proposed mitigation programs for impacted households and general public.	General Public, HCD, GCR
November/December 2019	Consultation	Butte Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Butte Fire Safe Council
November/December 2019	Consultation	Mendocino Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Mendocino Fire Safe Council
November/December 2019	Consultation	Sonoma County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Sonoma County Fire Safe Council

Date	Contact Type	Meeting	Purpose	Parties Represented
November/ December 2019	Consultation	Nevada County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Nevada County Fire Safe Council
November/ December 2019	Consultation	Napa County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Napa County Fire Safe Council
November/ December 2019	Consultation	Napa County Fire Department	GCR and Fire Department discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Napa County Fire Department
November/ December 2019	Consultation	Yuba County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Yuba County Fire Safe Council
November/ December 2019	Consultation	Ventura County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Ventura County Fire Safe Council
November/ December 2019	Consultation	San Diego County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and San Diego County Fire Safe Council

Date	Contact Type	Meeting	Purpose	Parties Represented
November/ December 2019	Consultation	Orange County Fire Safe Council	GCR and Fire Safe Council discuss ongoing fire mitigation projects, possibility of gap funding with mitigation funds and overall organizational capacity.	GCR and Orange County Fire Safe Council
February 2020	Consultation	Email to impacted tribal governments	Contact tribal governments for participation in CDBG- MIT public meetings and public comment draft.	List for DR-4434 and DR-4353 impacted tribal governments provided by the California Native American Heritage Commission and from https://egis.hud.gov/tat/
2/19/20	Stakeholder Outreach	Stakeholder briefing with CAL FIRE	Discuss proposed CDBG-MIT programs with CAL FIRE staff and provide opportunity to provide guidance on the document. Consulted on contacts with USFS and BLM staff.	HCD, CAL FIRE staff, GCR
2/19/20	Stakeholder Outreach	Stakeholder Briefing: CAL OES, SHMO	Brief SHMO on proposed CDBG-MIT programs.	HCD, Cal OES staff, GCR
2/20/20	Stakeholder Outreach	Webinar for impacted local governments	Presented draft CDBG- MIT programs to impacted local governments via webinar and provided opportunity for comments.	Local governments impacted by DR- 4344 and DR-4353, HCD, GCR
3/4/20	Public Meeting	Round 2 Public Meeting: City of Ventura and Ventura County	HCD presented the public comment draft of the CDBG-MIT Action Plan including draft programs, answered questions, and solicited public comments.	General Public, HCD, GCR
3/5/20	Public Meeting	Round 2 Public Meeting: City of Santa Barbara and Santa	HCD presented the public comment draft of the CDBG-MIT Action Plan including draft programs, answered	General Public, HCD, GCR

Date	Contact Type	Meeting	Purpose	Parties Represented
		Barbara County	questions, and solicited public comments.	
3/9/20	Public Meeting	Round 2 Public Meeting: City of Napa and Napa County	HCD presented the public comment draft of the CDBG-MIT Action Plan including draft programs, answered questions, and solicited public comments.	General Public, HCD, GCR
3/18/20	Public Meeting Webinar	Round 2 Public Meeting: Sonoma County and the City of Santa Rosa	HCD presented the public comment draft of the CDBG-MIT Action Plan including draft programs, answered questions, and solicited public comments.	General Public, HCD, GCR
3/23/20	Public Meeting Webinar	Round 2 Public Meeting: Nevada, Butte, and Yuba Counties	HCD presented the public comment draft of the CDBG-MIT Action Plan including draft programs, answered questions, and solicited public comments.	General Public, HCD, GCR

Appendix B – Public Comments

The following presents the public comments received for the CDBG-MIT Action Plan during the public comment period of February 21 – April 6, 2020 as well as HCD's responses to the comments. Comments are grouped by topic area.

C. Timeline

PUBLIC COMMENT: The Thomas fire had a huge impact on me. I lost my home to the fire. I experience PTSD and my home is just beginning to be built after 2 years and three months. Not happy we have to stop construction to get this grant.

HCD RESPONSE: The Owner-Occupied Housing Rehabilitation and Reconstruction Program is funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353), which is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the Owner-Occupied Housing Rehabilitation and Reconstruction Program please reference the [HCD website](#).

PUBLIC COMMENT: Not liking that we have to stop construction process in order to proceed with grant (have waited 2 years before starting construction).

HCD RESPONSE: The Owner Occupied Housing Rehabilitation and Reconstruction Program is funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353), which is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the Owner-Occupied Housing Rehabilitation and Reconstruction Program please reference the [HCD website](#).

D. Funding Decisions

PUBLIC COMMENT: Great program!

Could extra points/prioritization be given for projects that collaborate between jurisdictions in different zip codes/counties, perhaps as a region, (Sonoma, Ventura counties, 93108 etc).

Or even higher prioritization for those that leverage pub nonprofit-private partnerships and achieve program goas i.e. if Sonoma, Ventura or Santa Barbara counties collaborate to create one program design that would be implemented (and funded) in each respective county. One dataset could be collected then across different disasters, geographies, income levels, future risks, etc.

HCD RESPONSE: Scoring and prioritization for projects will be determined before a notice for funding availability will be released and will be detailed in program guidelines. HCD will consider prioritizing regional projects that meet grant requirements and provide the greatest outcomes.

PUBLIC COMMENT: We have several infrastructure projects that could qualify, but we are worried the county will shove their pet projects through. How do we get a fair shot at applying and getting past local politics?

HCD RESPONSE: While prioritization will ultimately occur at the local level, HCD will be responsible for the development of assessment and selection criteria for evaluating project attributes. Policies and procedures will also be established by HCD that outline the requirements of the program and rules for specific projects, including general eligibility and specific eligible and ineligible costs. The per project and per applicant funding caps, as well as the structure of funding rounds, are intended to provide eligible applicants with equal access to funding.

PUBLIC COMMENT: 1. Suggest inclusion in Round 1 for public services to enable those communities that are ready to act.

2. Incentivize partnering with local nonprofits and community groups in public service and outreach in criteria.

HCD RESPONSE: Public services will be available as part of Round 1 funding for eligible activities listed in the Action Plan. Round 1 for Infrastructure will include resources for planning. HCD will consider incentives or prioritizing public-private partnership projects that meet grant requirements.

PUBLIC COMMENT: Brainwashing us to think \$88 million is not a bit of money is insulting--we lost everything! No water pressure. Infrastructure issues way more important than flyers at a community center in low income zip code!!!

HCD RESPONSE: The Resilient Infrastructure Program allocates \$61,379,000 of CDBG-MIT funding to assist local jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the Mitigation Needs Assessment. The program will promote a range of impactful projects, from fuel breaks in the forest to strategic risk reduction within the Wildland-Urban Interface (WUI) to roadway improvements within densely populated, vulnerable communities.

PUBLIC COMMENT: I firmly believe that the funding should be fully dedicated to infrastructure resilience.

The 100 page document does a good job of outlining the various types of disasters that California needs to be prepared for.

I am adamantly opposed to the idea that Local Non-Profits can receive large grants without tying back to a specific disaster for this specific money.

The last thing we need is a "sponsored" FB post reminding us how to duck, cover and hold. The purpose for this funding is for LONG TERM benefits.

A flyer sent to every household in what, 12 languages? will quickly be tossed in the garbage. A total waste.

There are many good resources that already exist that will be leveraged when the time is right. Example: United Way reminds low income people about the EIC Tax Credit.

They just copy and paste and make it look like they've really served their population.

THIS MONEY MUST BE SPENT to secure supplies and NECESSARY items for WHEN we have the next disaster.

PLEASE reconsider how much money is to be given to non-profits. I am completely onboard with serving the lower income populations. Housing too, but Mitigation funding HAS to be spent

on preparing for the future....fixing ingress/egress routes, creating storage space for emergency supplies, updating water/gas systems to improve dependability, which is a main issue for losing so many homes in the Thomas Fire....no water and no pressure) and, now as we are learning first-hand with the Coronavirus Pandemic, we will need paper goods, safety suits, flash lights, water, medical supplies and antibacterial products.

Thank you for working with HUD to secure this money. It is really a fantastic opportunity to make positive changes in the communities that apply for the funds!

Appreciate the opportunity to provide these comments and I promise to stay tuned on this issue.

HCD RESPONSE: Local jurisdictions and nonprofit organizations that work within or impact the MID will be eligible to apply for the Resilience Planning and Public Services Program. Planning activities under the Resilience Planning and Public Services Program may involve the creation or updating of current plans for better alignment with mitigation principles or, in some cases, to examine hazards and establish actions for increasing resilience and preparedness. Entities may also use the funding to increase public services through establishing educational campaigns or local job training initiatives to ensure disaster preparedness is a vital component of their communities' resilience efforts going forward. The eligible activities above allow for regional or local jurisdictions and nonprofit organizations to submit appropriate applications for funding based on their individual mitigation needs as outlined within the Mitigation Needs Assessment.

PUBLIC COMMENT:

 <p>March 6, 2020</p> <p>Mr. Doug McCauley Acting Director of Housing and Community Development State of California 2020 West El Camino Ave Sacramento, CA 95833</p> <p>Dear Mr. McCauley,</p> <p>In response to the public comment period for California Department of Housing and Community Development (HCD) Action Plan and as a collaborative partner to HCD, the City of Santa Rosa (City) presents the following comments related to the plan to allocate the identified funds. These comments have been vetted with our partners at Sonoma County and while they will be providing separate feedback, we have collaboratively developed our comments and are jointly committed to working with HCD to refine the draft action. The City seeks mitigation programs that provide the necessary flexibility to enable the City to address remaining unmet needs caused by the Tubbs Fire of 2017 and as a Most Impacted and Distressed community. Please note, these recovery priorities are shared to assist HCD in the planning process. They are consistent with the concepts identified in HUD's Federal Register. In preparation of this program, the City has also established a working group with Sonoma County to share mitigation priorities and understand where collaboration may take place. The City welcomes a discussion with HCD to review this feedback in more detail under the notion that the meeting can inform plan development prior to submission to HUD.</p> <p>Address the City's top mitigation priority:</p> <p>To mitigate future risk, the City intends to relocate its Fire Station #5 (F55), which burned down during the 2017 Tubbs Fire. F55 provides critical fire and EMS service to the City's Fountaingrove area, which was decimated during the 2017 Tubbs Fire.</p> <p>Staff has consistently informed HCD that relocating F55 is the City's top priority in the recovery process. The City is continuing to explore all funding avenues under Federal Emergency Management Agency's Public Assistance (PA) Program; however, a significant funding gap exists even if permanent relocation is approved. Following California Office of Emergency Services' (CalOES) review of the City's December 26, 2019, appeal for permanent relocation, CalOES submitted a response letter to FEMA supporting the City's appeal.</p> <p>The F55 project currently cannot move forward until FEMA responds to CalOES's letter. Given feedback from FEMA to date, the City is uncertain that FEMA will grant its appeal. As such, the City would like to pursue all relocation costs, facility enhancements and resiliency improvements as eligible under CDBG-MIT.¹</p> <p>Given this context, the City has the following observations related to the current Action Plan draft:</p> <hr/> <p><small>¹ Please note that even if FEMA grants the City's appeal, there would be additional unmet costs associated with F55 relocation. This means it would remain the City's top CDBG-MIT priority. The City is currently pursuing FEMA funding.</small></p> <p>100 Santa Rosa Avenue, Room 10 • Santa Rosa, CA 95404 Phone: (707) 543-3010 • Fax: (707) 543-3030</p> <p style="text-align: right;">1</p>	<p>Identify critical facility hardening as a potential activity</p> <p>To delineate the importance of F55, the City recommends that HCD include critical facility hardening in the roster of potential activities listed in the draft plan. This enables the City to utilize the existing argument and associated cost benefit analysis for relocating the fire station in its application to utilize CDBG-MIT funds for mitigation measures on the new facility.</p> <p>In addition, the City conducted a review of projects developed for application to FEMA's Hazard Mitigation as well as the City's Local Hazard Mitigation Plan and Community Wildfire Protection Plan. Through that effort, projects were grouped into categories to assist in determining City priorities. Infrastructure hardening was identified as a main project category. Example projects include:</p> <ul style="list-style-type: none"> • Fire Station replacement and construction of five station (5,6,8,9,12) • Regional dispatch center • Permanent Warm EOC • SRPD Radio Replacement and expansion • New Public Safety Building • Evacuation Routes Construction and Enhancement (ex. rolled curbs) • SRW pump station upgrades of three impacted stations (10,13,14) • Transit Mall Emergency Generator • Emergency Groundwater Wells • New evacuation center/shelter • Seismic Improvements to Steel Reservoirs • Treatment Plant Roof Project • Electric Utility Undergrounding in the WUI <p>Raise program caps of the Resilient Infrastructure Fund</p> <p>While the City recognizes program caps are necessary to demonstrate that financial controls are being utilized for HUD to approve the plan, they directly impact the City's top mitigation priority which meets the Eligibility criteria outlined in e) Eligibility as well as many of the f) Prioritization elements of the draft Action Plan, but may immediately exceed the \$5M program cap. Establishing a program cap of \$5M may restrict the level of risk reduction available to local communities. For example, eight (8) projects that the City submitted through FEMA's HMGIP, PDM and FLA mitigation programs were in excess of \$5M. Thus, the City would like to see a higher program cap. In addition, the City would like to better understand how the \$10M jurisdictional cap addresses the requirement of 50% of funding being allocated to projects in the MID communities and to address the LMI requirement. As written, this program only provides \$20M total to the City and the County, which by far realized the most significant impacts with the greatest combined unmet needs.</p> <p>Ensure launch dates of the Resilient Infrastructure Fund enable timely submission of projects.</p> <p>While the City has shovel ready projects in the project portfolio, projects in the mitigation portfolio that can provide a greater return on risk reduction such as F55 would not be considered a "shovel ready" project based on the Action Plan definition. The City anticipates the F55 project being ready well before</p> <p style="text-align: right;">2</p>
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the Early 2024 Approximate Launch date of Round 2 and is willing to further develop other projects that were explored related to FEMA's mitigation programs. However, these applications may not be fully developed prior to the current Round 1 timeline and the City would incur cost to continue project planning. To further enable eligibility, the City recommends:

- Removing the Rounds from the plan to eliminate the sequencing or,
- Clearly outline the timeline of application for Round 1. For example, will the program be first come first serve or will there be an application period with all projects evaluated together?
- Specifically acknowledging the use of design-build contracts to expedite project delivery.

Summary

The City welcomes a discussion with HCD to develop an Action Plan that will assist Santa Rosa in mitigating the impacts of future disasters. The City also recognizes that a substantial action plan amendment is being developed to allocate the supplemental DR funding granted to HCD from HUD. The City is happy to expand the meeting topics to include how potentially both of those funding sources can assist the City in recovering from the Tubbs Fire.

We appreciate your consideration of the City of Santa Rosa's input.

Thank you,


Sean McGlynn
City Manager

- c: Santa Rosa City Council
The Honorable Mike McGuire, California State Senate
The Honorable Marc Levine, California State Assembly
The Honorable Jim Wood, California State Assembly
The Honorable Bill Dodd, California State Senate
The Honorable Cecilia Aguilar-Curry, California State Assembly
Kyra Emanuel-Ross and David Jones, Emanuel Jones & Association
Kyriakos Pagonis, MMO Partners

HCD RESPONSE: HCD will develop a competitive application by which eligible applicants (units of local government) can apply for funding to support projects that reduce risk to the MID. HCD anticipates that the program design will present projects that could overlap across different environments, enabling HCD to determine maximum impact within the MID and surrounding areas. Potential activities may include (but are not limited to):

- Emergency roadway improvements (ingress/egress and evacuation routes),
- Fuel breaks and fuel reduction measures, some of which may be outlined in local jurisdictions' hazard mitigation plans,
- Watershed management activities as outlined in local jurisdictions' hazard mitigation plans,
- Defensible space,
- Hardening of communication systems,
- Flood control structures,
- Flood drainage measures,
- Alternative energy generation,
- Seismic retrofitting, and/or
- Critical facility hardening.

HCD acknowledges the importance of relocating Fire Station #5 and that the project is generally eligible for CDBG-MIT funding under HCDA Section 105(a)(2) – Public Facilities and Improvements; however, at this time, HCD cannot determine whether the project (or any other project) will receive funding as the policies and procedures for the Resilient Infrastructure Program have yet to be developed.

E. Grant Eligibility

PUBLIC COMMENT: I was forwarded the information you shared regarding the Hazard Mitigation Grant information. Last year, our City submitted several Haz Mitigation grant applications. It appears all the applications were either forwarded to County OES for possible funding or placed on a waiting list. City of Thousand Oaks staff made several inquiries regarding the status of the grant applications, including a request to clarify what the "Wait" list meant or the timeline for a funding decision.

My question to you or your HMGP rep is "Can a City re-submit an application that was submitted in 2019 for the Thomas Fire application process in 2020?"

Any help you can provide would be appreciated as I will not be able to attend the March 4 meeting.

HCD RESPONSE: As long as the proposed project has not been funded by a different source and meets the Resilient Infrastructure Program guidelines, it may be submitted for consideration. Policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility and specific eligible and ineligible costs.

PUBLIC COMMENT: We know nothing about available grants for victims of the Thomas fire. Did we miss something in your internet notice? We are concerned about burning palm fronds- one of which fell on our home.

HCD RESPONSE: The Owner-Occupied Housing Rehabilitation and Reconstruction Program is funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353), which is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the Owner-Occupied Housing Rehabilitation and Reconstruction Program please reference the [HCD website](#).

PUBLIC COMMENT: If the insurance did not give us enough to rebuild the total loss house are we qualified to receive a grant in order to finish our house?

HCD RESPONSE: The Owner Occupied Housing Rehabilitation and Reconstruction Program is funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353), which is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the Owner-Occupied Housing Rehabilitation and Reconstruction Program please reference the [HCD website](#).

PUBLIC COMMENT: Communities in Butte County are in strong need of fuels reduction, forest health thinning, evacuation route clearing, home hardening, planning, and fuel breaks.

We appreciate all the topics you have covered. We would recommend the Action Plan allow non-profits like the firesafe council to apply for projects.

HCD RESPONSE: HCD has consulted the SHMP and local HMPs and met with local stakeholders and local planning organizations, including the Fire Safe Councils, to ensure it promotes and implements local and regional planning and infrastructure considerations that were informed by the Mitigation Needs Assessment.

The Resilient Infrastructure Program allocates \$61,379,000 of CDBG-MIT funding to assist local jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the Mitigation Needs Assessment. The program will promote a range of impactful projects, from fuel breaks in the forest to strategic risk reduction within the Wildland-Urban Interface (WUI) to roadway improvements within densely populated, vulnerable communities. Projects for infrastructure may address risks to a variety of systems and structures to enable continuous operations of critical business and government functions during future disasters and improve responses for human health and safety or economic security. HCD anticipates that the program design will present projects that could overlap across different environments, enabling HCD to determine maximum impact within the MID and surrounding areas.

Through state partnerships, HCD will encourage local jurisdictions to reach out to their local Fire Safe Councils to coordinate efforts with the goal of maximizing the impacts and identify other funding sources to leverage the CDBG-MIT grant.

F. Eligible Activities

PUBLIC COMMENT: Would like to see some of these funds used for preventative mitigation in the areas of Code Training and Code Enforcement before these disasters occur. Local jurisdictions need resources badly.

HCD RESPONSE: These activities would be eligible projects under the public services program category. Eligible jurisdictions would be able to submit applications for consideration when the request for proposals is released.

PUBLIC COMMENT: More funding is needed for public education by building departments to help property owners, designers and contractors understand building code requirements while designing and constructing improvements to make buildings more resilient during brush fires, earthquakes, etc.

Also more funding would be very helpful to assist property owners upgrade their homes (when built prior to 2008) to comply with current construction standards for fire safety.

HCD RESPONSE: These activities would be eligible projects under the public services program category. Education and outreach projects will be considered when applications are submitted through the public service program request for proposals.

Funding for property owners is available through the Owner Occupied Housing Rehabilitation and Reconstruction Program and the Multifamily Housing Program which is funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353). This is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the multifamily and homeowner programs please reference the [HCD website](#).

G. Policy Decisions

PUBLIC COMMENT:

Greetings Ladies and Gentlemen, Damas y Caballeros ~

I enjoyed your presentation. I am especially interested in hazard mitigation in future incidents. Having worked for the U.S. Forest Service before living and working in Montecito, I received I knowledge of the cyclic role of fire in ecosystems. Whereas those who live in fixed habitations tend to view wildfires as destructive, indigenous peoples, especially nomadic and hunter-gather peoples have often appreciated fire as an energy flow that cycles through forests and grasslands as a regenerative force. When Spanish explorers landed in California, they described the landscape as a vast garden. It appeared so because the California tribes were fire wise. They did not suppress burns, but performed controlled burns to create meadows for planting chia seeds and to create meadows to attract deer and other game. They had learned, like some nomadic tribes, that fire is a close comrade of the rivers, as is a brother to his sisters. If fire, as an element in the metabolism of the forests and grasslands, burns in a balanced way, then the rivers and streams will tend to flow in a balanced way. In this way the metabolism of forests is similar to human metabolism. If the digestive fire burns too fiercely, the gastric juices may flow too abundantly. This will upset the metabolic ecology.

To maintain fire in its balanced state, knowledge is necessary. The knowledge is there, but it has been secreted away in Vedic, Chumash, and other originally oral traditions. Having been immersed in this knowledge for some decades, it became frustrating when I attempted to impress upon my neighbors the severity of what the streams and rivers were about to unleash in Montecito. Although the phrase “significant debris flows” had been officially broadcasted, at about ten on Monday morning the 8th of January, 2018, I received a call from MERRAG asking me to turn on my radio, remain in place, and report anything dangerous. I replied to the caller that she was giving out the wrong advice, that we were under a mandatory evacuation order,

and that I would pass along the message to my managers but advise that they disobey it and evacuate.

Some months after the debris flow, I learned from the National Geographic special on the debris flow that a SB County Sheriff officer had positioned herself on the San Ysidro Creek bridge just before the debris flow, and was saved only by serendipity. As she was sitting there, I had assumed everyone had evacuated and was sound asleep in a Motel 6 in San Luis Obispo. Had I know that twenty-three people, some of them my friends and neighbors, were going to die, I would have, before evacuating, gone knocking door to door.

Significant debris flows had been forecasted, but the message did not resonate with the Montecito population. Most blame evacuation fatigue. Perhaps it boils down to a matter of narrative design. The shape of the story. The tallness of the tale. Perhaps we must ask the following question: What are the characteristics of messages that DO work in such circumstances?

Traditional knowledge handed down from generation to generation helped to save ancient tribes on India's Andaman and Nicobar Islands from the worst of the Indonesian tsunami of 2008. Other isolated island communities who had moved to their islands from South East Asia only a centuries ago fared far worse than the indigenous peoples. The aboriginal tribes—some of the oldest and most isolated in the world—have oral traditions developed from previous earthquakes that instructed them to escape to higher ground before the massive tsunami struck the island chain off Indonesia. The Onge tribe, for example, have lived on Little Andaman for between 30,000 and 50,000 years and, though they are on the verge of extinction, almost all of the 100 or so people left seem to have survived the 26 December quake and the devastating waves that followed. Their folklore talks of huge shaking of ground followed by high wall of water." When the earthquakes struck, the Onges moved to higher ground deep inside their forest and escaped the fury of the waves that entered the settlements. Another aboriginal people—the Jarawa on South and Middle Andaman—also fled to higher ground before the waves.

Similarly, the knowledge of the cyclic ecological role of fire is there. This includes the knowledge of the relationship between fire and his sisters: the rivers and streams. So city planners must understand that Nature is not a place we visit. It is where we live. And they must design accordingly. All the knowledge on earth, however, will be of use if it is not heeded. And it will not be heeded unless it resonates. And it will not resonate unless it also is designed accordingly.

Therefore we must tell a story of the forests and her wildfires and streams and rivers and peoples that is alluring, that resonates in people's hearts and remains in their memories. I propose a two-pronged approach. First, igniting in each afflicted community its own oral tradition by taping an communal oral history of the fires and the subsequent debris flows. This will serve not only to continue and deepen a sense of community, but to act as a cathartic force and folkloric reminder. This oral history will be always available and remain in the community's memory. Second, we must have an educational component that lays out the science in a compelling way. With a background in the United States Forest Service, and having written my M.A. thesis at the University of California, Santa Barbara, on the subject of an oral tradition of fire ecology, I am well prepared to design a curriculum. In addition I am a journalist who contributes to the Santa Barbara Independent and a writer with a history of transforming complex subjects into easily digestible morsels. I am not, however, a nonprofit organization and seek advice on how to proceed.

HCD RESPONSE: In order for projects to be approved they must go through an Environmental Assessment (EA) and meet all state and federal requirements with regards to Tribal consultation including requirements of the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA).

PUBLIC COMMENT: Maintain public lands; same requirements that Government place on private home owners.

HCD RESPONSE: Federal and state agencies that maintain public lands have a number of laws, regulations, requirements, and statutes they must comply with in managing and maintaining public lands. The State of California regularly reviews and proposes updates for its agencies and local jurisdictions to adhere to for public land maintenance.

PUBLIC COMMENT: Multifamily housing built in fire, flood, and earthquake resistant zones—such as the urban core seem to be a key means of mitigating risk to life and property. Also—Earthquake retrofit bracing systems for mobile homes should be an eligible use under the home building program

HCD RESPONSE: The Owner Occupied Housing Rehabilitation and Reconstruction Program and the Multifamily Housing Program are funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353), which is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the multifamily and homeowner programs please reference the [HCD website](#).

PUBLIC COMMENT:

 <p>April 5, 2020</p> <p>Susan Naramore Senior Specialist – Disaster Recovery CA Dept. of Housing & Community Development 2020 West El Camino Avenue Sacramento, CA 95833</p> <p>RE: Community Development Block Grant – MIT Funding (Code Training & Enforcement)</p> <p>Dear Ms. Naramore,</p> <p>It was a pleasure to meet you March 9 in Napa at the HCD’s public meeting on CDBG-MIT funds. By way of this letter, I wanted to once again express the support of the International Code Council (ICC) for CDBG-MIT funding for code training and enforcement.</p> <p>The ICC is a non-governmental, non-profit organization, driven by the engagement of 65,000 members, dedicated to helping communities and the building industry provide safe, resilient, and sustainable construction through the development and use of model codes (I-Codes) and standards used in design, construction, and compliance processes. All 50 states, federal agencies, and many global markets choose the I-Codes to set the standards for regulating construction and major renovations, plumbing and sanitation, fire prevention, and energy conservation in the built environment. Several of the I-Codes are adopted here in California, including the Building Code, Fire Code, Residential Code, and Existing Building Code.</p> <p>Federal, state and local agencies, structural engineers and architects, members of the construction industry, and the fire services are active participants in the model code development process, ensuring the final consensus result balances cost, safety, and other public interest considerations. State and local governments adopt, amend, and enforce model building codes to advance policy goals and to ensure the health, safety, and welfare of their residents. The I-Codes are updated on a three-year cycle to allow for the capture of new research and technologies.</p> <p>ICC strongly supports the commitment to use funding to support community implementation of modern building codes and the enforcement of those codes. Research has shown that mitigation through current code adoption and following proper code enforcement procedures are key components to resiliency in the built environment. The National Institute of Building Sciences (NIBS) found that for every dollar invested, the 2018 International Building Code (IBC) and International Residential Code (IRC) provide \$11 in mitigation benefits against flood, hurricane, and earthquake risk - https://cdn.vimaweb.com/www.nibs.org/resources/resmgmcmc/NIBS_MSv2-2018_Interim-Report.pdf.</p>	<p>International Code Council Western Regional Office 1500 Capitol Mall, Suite 1000 Fremont, CA 94538 T 510.769.5400 F 510.769.5401 www.iccs.org</p> <p>In the most particular wildfire prone regions of the state, the NIBS project team found that meeting the International Wildland Urban Interface Code (IWUIC), which addresses ignition resistant construction, defensible space, and access for emergency responders and water, could generate more than \$6 in benefits for every \$1 invested.</p> <p>Although building code adoption alone generates enormous mitigation benefits, code enforcement is equally important. FEMA quantified the cost of Dade County’s inadequate code enforcement as a quarter of the \$16 billion in insured losses from Hurricane Andrew. Researchers found similar results about 15 years later: that implementing building codes at the local level by ensuring proper staffing, training and certification, provides an additional loss reduction value on the order of 15-25%.</p> <p>Recognizing the life safety and mitigation benefits that current building codes provide for communities, the U.S. Department of Housing and Urban Development (HUD) has both required applicants for disaster recovery funding commit to adopt resilient codes and made available significant sums for codes’ adoption and implementation. For the past seven years, and across multiple allocations, HUD has required Community Development Block Grants for Disaster Recovery (CDBG-DR) applicants demonstrate in their action plans how they will support the adoption of resilient building codes.</p> <p>HUD’s CDBG-MIT funding notice state that “through this allocation for mitigation”, HUD seeks to “support the adoption” of the “latest edition of the published disaster-resilient building codes and standards (to include wildland urban interface, flood and all hazards, ASCE-24 and ASCE-7 respectively).” As such, “grantees are encouraged to propose an allocation of CDBG-MIT funds for building code development and implementation, land use planning and/or hazard mitigation planning activities that may include but not need to be limited to: (a) the development and implementation of modern and resilient building codes consistent with an identified model or standard such as ASCE 24 and ASCE 7 as may be applicable, in order to mitigate against current and future hazards.”</p> <p>FEMA has similarly prioritized code adoption and enforcement, concluding in its most recent five year strategic plan (https://www.fema.gov/media-library-data/533052524606-b5137201a46144de5e0129e011ebf661strat_plan.pdf) that current building code adoption and enforcement are two of the most effective mitigation measures a jurisdiction can undertake by stating “disaster resilience starts with building codes, because they enhance public safety and property protection”. In the Plan’s very first objective, FEMA highlighted the importance of the Agency’s “advocating for the adoption and enforcement of modern building and property codes”.</p> <p>In August of 2019, the Mitigation Framework Leadership Group (MitFLG) – chaired by FEMA and made up of another 13 federal agencies and departments as well as state, tribal and local officials – released the National Mitigation Investment Strategy (NMIS). The Strategy makes several recommendations concerning the use, enforcement, and adoption of building codes including that “trained, certified professionals should handle building inspections and code administration.”</p>
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In California's CDBG-MIT Draft Action Plan, ICC suggests adding on to page 26's sentence "Building and fire codes that decrease the likelihood of structural ignitions and flame contact with WUI fire areas, reducing the ability of fire to spread to structures" so that it includes activities associated with adoption and use of the most current International Wildlife Urban Interface Code (IWUIC), including code review, materials, and training, as eligible for funding under the CDBG-MIT Plan. The 2021 IWUIC addresses many concerns including:

- Ignition resistant construction
- Noncombustible roof coverings
- Screens to prevent burning embers from penetrating into eaves and under foundations
- Creating and maintaining defensible spaces around buildings
- Fire service access to structures and to water supplies, and
- Fire protection planning

Additionally, ICC would like to encourage California's CDBG-MIT Draft Action Plan to expressly permit CDBG-MIT funds to be available for code enforcement activities, including training and staffing, which have proven to increase loss avoidance encouraged as part of our national mitigation strategy, and would be welcomed across the state. California's average department employee training expenditure per capita of population served is half the national average and average training expenditure as a percentage of overall department expenditure is 62% below the national average (<http://www.verisk.com/siteassets/media/downloads/underwriting/location/2019-beegs-schedule.pdf>). In California, all construction inspectors, plans examiners, and building officials are required to complete a minimum of 45 hours of continuing education for every three-year period, and funding for training would not only contribute to ensuring construction complies with adopted codes but assist in meeting this requirement.

Thank you in advance for your consideration of the adoption and enforcement of strong building codes which saves communities millions of dollars during natural disasters. If you have any questions, please don't hesitate to contact me (cocochoa@iccsafe.org) or my colleague Susan Dowty (sdowty@iccsafe.org).

Sincerely,



Christopher E. Ochoa, Esq.,
International Code Council

HCD Response: The Action Plan has been updated to include code enforcement activities including training and staffing as sample eligible uses within the Planning & Capacity Building program description.

H. Miscellaneous

PUBLIC COMMENT: Please email the slides? Thank you.

HCD RESPONSE: Slides may be emailed as requested. Slides from public meetings will also be made available on [HCD's website](#).

PUBLIC COMMENT: Lender sold my loan during rebuild from fire and sent my insurance proceeds to new lender. Took weeks to get new lender to acknowledge they had my insurance funds and to pay contractors already hired.

HCD RESPONSE: The Owner-Occupied Housing Rehabilitation and Reconstruction Program is funded through Community Development Block Grant Disaster Recovery (CDBG-DR) funds in response to 2017 Disasters (FEMA DR-4344 and DR-4353), which is a separate funding source than the CDBG Mitigation (CDBG-MIT) funding being addressed by this Action Plan. For additional details on the Owner-Occupied Housing Rehabilitation and Reconstruction Program please reference the [HCD website](#).

PUBLIC COMMENT: Hello, I received an email minutes ago (1/21/20) regarding this meeting tomorrow evening. I cannot attend the meeting on less than 24 hours notice. I do, however, have suggestions regarding mitigation measures that need to be addressed. Five years ago I raised the issue of dead and dying oak trees in record numbers in the vicinity of Sulphur

Mountain and Upper Ojai. CAL Fire came to our property and shared their concerns, but insisted there was no funding to remove the thick, dead trees, leaves and branches. They confirmed the trees had died from beetle infestation and drought. Sure enough, the Thomas fire started in the “worst possible location under the worst possible weather conditions” (Ojai Valley News). Within 3 hours, our property was engulfed in windblown flames and the dead or weakened oak trees burned for days. Dead half-burned brush is now thick in this area. Many damaged trees have fallen since the fire and are lying on the forest floor awaiting the next fire. Our Upper Ojai community was ground zero for the fire, yet not one offer to help to mitigate the mountains of debris covering the landscape has come forth. The only offers of assistance were exclusively for homes or burned buildings. Perhaps this new funding might help? I suggest you hold such a meeting with adequate notice in Upper Ojai, ground zero, where the interface with Los Padres National Forest and BLM land occurs. By our own community count, 900 people were left homeless in Upper Ojai. Many have moved away, only a few have been able to rebuild. I realize this funding is not for homes, rather for mitigations, which is exactly what we need. The last issue that may qualify for mitigation is the plethora of natural oil seeps that occur all over the area. During the fire the oil seeps ignited spewing toxic fumes for weeks and in a couple of cases for more than a year. How can we prepare for that highly likely recurrence in the next fire? How can residents be protected from the added toxicity in the air from highly dense burning oil?

HCD RESPONSE: The Resilient Infrastructure Program allocates \$61,379,000 of CDBG-MIT funding to assist local jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the Mitigation Needs Assessment. The program will promote a range of impactful projects, from fuel breaks in the forest to strategic risk reduction within the Wildland-Urban Interface (WUI) to roadway improvements within densely populated, vulnerable communities. Projects for infrastructure may address risks to a variety of systems and structures to enable continuous operations of critical business and government functions during future disasters and improve responses for human health and safety or economic security. HCD anticipates that the program design will result in projects that could overlap across different environments, enabling HCD to determine maximum impact within the MID and surrounding areas. Potential activities may include (but are not limited to):

- Emergency roadway improvements (ingress/egress and evacuation routes),
- Fuel breaks and fuel reduction measures, some of which may be outlined in local jurisdictions’ hazard mitigation plans,
- Watershed management activities as outlined in local jurisdictions’ hazard mitigation plans,
- Defensible space,
- Hardening of communication systems,
- Flood control structures,
- Flood drainage measures,
- Alternative energy generation,
- Seismic retrofitting, and/or
- Critical facility hardening.

HCD will consult with the appropriate state agencies to provide subject matter expertise in vetting and evaluating project proposals. These agencies will serve as state partners that

support HCD in the development of assessment and selection criteria in evaluating project attributes, such as:

- Effectiveness in mitigating risk to community lifelines,
- Benefits by calculating risk reduction value,
- Risk reduction strategy is designed in a way that is cutting edge, sound, environmentally conscious, and potentially replicable, and
- Ability to leverage other funding sources and ensure state or local resources are considered in looking at a project's continued operation and maintenance.

PUBLIC COMMENT: There was suppose to be an email that would be sent back to those who attended the HCD meeting on March 25th, 2020 containing what was presented along with questions asked and answers given. When should people expect to give this?

HCD RESPONSE: Slides may be emailed as requested. Slides from public meetings and the Action Plan, inclusive of public comments received and the responses to them, are posted to the [HCD website](#).

PUBLIC COMMENT: I would like to access information regarding Community Development Block Grant Mitigation (cdbg-mit). I know there is some sort of mailing list but I don't seem to find it on your website. Thanks so much

HCD RESPONSE: Thank you for your interest, we have added you to the mailing list. Information related to the CDBG-MIT program is available on the [HCD website](#).

Appendix C - Certification and Risk Analysis

The Department of Housing and Community Development submitted the Certification and Risk Analysis Implementation Plan to HUD on March 6, 2020.

A. CDBG-MIT Certifications

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation of CDBG– MIT funds must make the following

certifications with its action plan:

- a. The grantee certifies that it has in effect and is following a residential antidisplacement and relocation assistance plan in connection with any activity assisted with CDBG–MIT funding.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–MIT funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with CDBG–MIT funds are consistent with its action plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for CDBG–MIT funds.
- e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. State grantee certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - a. Funds will be used solely for necessary expenses related to mitigation activities, as applicable, in the most impacted and distressed areas for which the President declared a major disaster in 2015, 2016, or 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq.*).

- b. With respect to activities expected to be assisted with CDBG–MIT funds, the relevant action plan has been developed to give priority to activities that will benefit low- and moderate income families.
- c. The aggregate use of CDBG–MIT funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 50 percent (or another percentage permitted by HUD in a waiver published in an applicable **Federal Register** notice) of the CDBG– MIT grant amount is expended for activities that benefit such persons.
- d. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–MIT funds by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) CDBG–MIT funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- i. The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601– 3619), and implementing regulations, and that it will affirmatively further fair housing.
- j. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing:
 - a. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - b. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- k. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out mitigation activities, as applicable, in a timely manner and that the grantee has reviewed the respective requirements of this notice. The grantee certifies to the accuracy of its Public Law 115–56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at section V.A.1.a of this notice and its implementation plan and capacity assessment and related submissions to HUD referenced at section V.A.1.b.
- l. The grantee certifies that it considered the following resources in the preparation of its action plan, as appropriate: FEMA Local Mitigation Planning Handbook: https://www.fema.gov/media-library-data/20130726-1910-25045-9160/fema_local_mitigation_handbook.pdf; DHS Office of Infrastructure Protection: <https://www.dhs.gov/sites/default/files/publications/ip-fact-sheet-508.pdf>; National Association of Counties, Improving Lifelines (2014): https://www.naco.org/sites/default/files/documents/NACo_ResilientCounties_Lifelines_Nov2014.pdf; the National Interagency Coordination Center (NICC) for coordinating the mobilization of resources for wildland fire: <https://www.nifc.gov/nicc/>; the U.S. Forest Service’s resources around wildland fire

(<https://www.fs.fed.us/managing-land/fire>); and HUD's CPD Mapping tool:
<https://egis.hud.gov/cpdmaps/>.

- m. The grantee certifies that it will not use CDBG–MIT funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- n. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- o. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- p. The grantee certifies that it will comply with applicable laws.

The State of California Department of Housing and Community Development hereby certifies the above as authorized by the Executive Director.



Jennifer Seeger, Deputy Director, Division of Financial Assistance, CA HCD

B. 2. SF-424

HCD submits this Action Plan to HUD along with a completed and executed Federal Form SF- 424.