Department of Housing and Community Development



State of California Action Plan for Disaster Recovery from 2018 Disasters Action Plan Amendment No. 4

California Department of Housing and Community Development

Public Comment Period: May 1st – June 1st, 2023 Submitted to HUD: Approved by HUD:

For submission to the U.S. Department of Housing and Urban Development (HUD) to fulfill requirements related to Community Development Block Grant Disaster Recovery (CDBG-DR) Funds in Response to 2018 Disasters (FEMA DR-4382 and DR-4407)





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I. Background and Summary of Changes

On January 27, 2020, the U.S. Department of Housing and Urban Development (HUD) allocated \$1,017,399,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of California to support California's unmet recovery needs, related to the Federal Emergency Management Agency (FEMA) Major Disaster Declarations DR-4407 and DR4382 for the 2018 wildfire season. The funds were released in two allocations: Public Law 115-254 Unmet Needs allocation of \$491,816,000 and Public Law 116-20 Unmet Needs allocation of \$525,583,000.

The California Department of Housing and Community Development (HCD) manages CDBG-DR funds, in accordance with the goals and objectives set forth in the state's initial HUD-approved Action Plan for 2018 disasters ("18DR-Action Plan"). This is the fourth amendment to this Action Plan.

This amendment proposes two updates:

Owner Occupied Rehabilitation and Reconstruction Program: 18DR APA 4 modifies the state's Owner-Occupied Rehabilitation and Reconstruction Program (OOR) to better assist LMI households who have a gap in their total assistance and as such cannot currently receive an award from the program. To ensure that assisted households can complete their repair or reconstruction projects, OOR makes awards only to projects that will be fully funded through the addition of the CDBG-DR assistance. HCD estimates there are over 100 applicant households experiencing such a shortfall. The amendment provides a path to award and project completion for this population by introducing a forgivable loan that may be awarded in addition to grant funds.

The forgivable loan will be based on the amount of the applicant's gap, is available only to qualifying Solution 1 (state managed reconstruction) LMI households and is capped at \$250,000. Loans will only be available in conjunction with a grant. The loan cap was determined based on an analysis of applicant need and is projected to assist 68% of that population. To allow for awarding the proposed forgivable loans, the amendment also proposes increasing the total CDBG-DR funding cap from \$500,000 to \$750,000, inclusive of both grant and loan funding. The amendment clarifies deed restrictions for the subsidized loan and the agreements to be signed and the form in which the assistance is provided.

General Budget Updates: General Budget Updates: 18APA 4 consists of two budget updates:

Activity Delivery Costs: The original 2018 Action Plan allocated \$66,392,850 to activity delivery costs (ADC) which HUD defines as the costs to deliver CDBG-DR programs. In the Action Plan budget, these funds were shown in their own line item. All ADCs must be directly tied to a CDBG-DR funded program in HUD's Disaster Recovery Grant Reporting system (DRGR). In order to align the program budgets in the Action Plan with the DRGR budgets, HCD is updating the Action Plan in 18APA 4 to show the \$66,392,850 is allocated to active programs.

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Reduction of funding for the Planning Program: 18APA 4 reduces the planning budget by \$24,888,348.12 and moves the funding into programs where additional funding is needed to support the implementation of the programs. This budget change right-sizes the budgets for the existing 2018 DR Planning Program and the 2018 CDBG-Mitigation Planning and Public Services Program.

Page numbers are provided with the proposed changes. Removed and replaced text updates have been made in the context of the named section within the Action Plan. APA 4 has been determined to be a substantial amendment.

Summary:

Action Plan Amendment 4 (APA 4) will address changes in the following items:

1. **Executive Summary**, proposed uses of CDBG-DR funds: Provides an update to include the subsidized loan for the OOR program and budget adjustments to allocate planning dollars and ADC costs.

2. Program Overviews

- a. Owner Occupied Housing Rehabilitation and Reconstruction, Maximum Assistance: This section updated to provide an update to include the funding from the subsidized loan assistance.
- b. Owner Occupied Housing Rehabilitation and Reconstruction, Maximum Assistance, Hardship: This section updated to provide an update to include the funding from the subsidized loan assistance.
- c. Owner Occupied Housing Rehabilitation and Reconstruction, Deed Restrictions and Restrictive Covenants: Update to the deed restrictions.
- d. Owner Occupied Housing Rehabilitation and Reconstruction, Form of Assistance: This section updated to provide an update to include the subsidized loan for the OOR program.
- e. Multifamily Housing Program: Update to unmet needs section to change the program budget.
- f. Multifamily Housing Program: Update to Allocation Methodology to align with the budget update.
- g. Infrastructure Program: Update to unmet needs section to change the program budget.
- h. Workforce Development: Update to unmet needs section to change the program budget.

II. Action Plan Amendment

Text updates inserted or deleted made in the context of the section within the Action Plan are listed below.

1. Executive Summary, proposed uses of CDBG-DR Funds (page 10)

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Remove:

FIGURE 1: 2018 CDBG-DR BUDGET SUMMARY - PROPOSED APA 3 BUDGET

Program	Original Program Allocation	APA2 Change	Revised APA2 Allocations	Percentage of Total Program Allocation	APA3 No change
Total CDBG-DR Funds	\$1,017,399,000		\$1,017,399,000	100.0%	\$1,017,399,000
Housing	\$455,794,752	+28,000,000	\$483,794,752	47.55%	\$483,794,752
Owner-Occupied Rehabilitation and Reconstruction	\$205,107,638	+\$2,000,000	\$207,107,638	20.36%	\$207,107,638
Homebuyer Assistance Program		+\$26,000,000	\$26,000,000	2.56%	\$26,000,000
Multifamily/Small Rental Housing	\$250,687,114		\$250,687,114	24.64%	\$250,687,114
Infrastructure	\$317,428,488	\$347,428,488	\$347,428,488	34.15%	\$347,428,488
Local Infrastructure/ FEMA Match	\$317,428,488		\$317,428,488	31.2%	\$317,428,488
Paradise Sewer A&E		\$30,000,000	\$30,000,000	2.95%	\$30,000,000
Economic Revitalization	\$40,695,960		\$40,695,960	4.0%	\$40,695,960
Workforce Development	\$40,695,960		\$40,695,960	4.0%	\$40,695,960
Planning	\$86,217,000	(\$58,000,000)	\$28,217,000	2.77%	\$28,217,000
Technical Assistance & Capacity Building	\$15,000,000		\$15,000,000	1.47%	\$15,000,000
Regional & Local Planning Activities	\$71,217,000	(\$58,000,000)	\$13,217,000	1.30%	\$13,217,000
State and Local Program Delivery	\$66,392,850		\$66,392,850	6.53%	\$66,392,850
Administration	\$50,869,950		\$50,869,950	5.0%	\$50,869,950

Replace:

FIGURE 2: 2018 CDBG-DR BUDGET SUMMARY - PROPOSED APA 4 BUDGET

	Current Budget	APA 4 Change	APA 4 Budget	Local Assistance	Percentage
Total CDBG-DR				N/A	
Funds	\$1,017,399,000	N/A	\$1,017,399,000.00	IN/A	100.00%
Housing	\$483,794,752	\$46,061,064.20	\$529,855,816.20	N/A	52.08%





Owner-Occupied					
Rehabilitation and					
Reconstruction	\$207,107,638	\$15,275,984.19	\$222,383,622.19	\$199,033,341.84	21.86%
Homebuyer					
Assistance					
Program	\$26,000,000	\$332,686.65	\$26,332,686.65	\$23,567,754.56	2.59%
Multifamily/Small					
Rental Housing					
Program	\$250,687,114	\$30,452,393.36	\$281,139,507.36	\$250,687,114	27.63%
Infrastructure	\$347,428,488	\$41,920,212.80	\$389,348,700.80	\$347,441,663.22	38.27%
Local Infrastructure					
/FEMA Match	\$317,428,488	\$41,920,212.80	\$359,348,700.80	\$347,441,663.22	35.32%
Paradise Sewer					
A&E	\$30,000,000	\$	\$30,000,000	N/A	2.95%
Economic					
Revitalization	\$40,695,960	\$5,846,412.33	\$46,542,372.33	N/A	4.57%
Workforce					
Development	\$40,695,960	\$5,846,412.33	\$46,542,372.33	\$40,741,655.74	4.57%
Planning	\$28,217,000	\$(24,888,348.12)	\$3,328,651.88	N/A	0.33%
Technical	. , ,		,		
Assistance &					
Capacity Building	\$15,000,000	\$(15,000,000.00)	\$0		0.00%
Regional & Local		,			
Planning Activities	\$13,217,000	\$(12,434,839.33)	\$782,160.67	N/A	0.33%
State and Local					
Program Delivery	\$66,392,850	\$(66,392,850.00)	\$0	\$0	0.00%
Administration	\$50,869,950	\$	\$50,869,950	N/A	5.00%

Remove: The majority of funds will be allocated to housing recovery programs. This includes the state-run Owner-Occupied Rehabilitation and Reconstruction Program which allows affected residents to apply directly to the state for grants up to \$200,000.

Replace: The majority of funds will be allocated to housing recovery programs. This includes the state-run Owner-Occupied Rehabilitation and Reconstruction Program which allows affected residents to apply directly to the state for grants up to \$500,000 and subsidized loans up to \$250,000 to repair or rebuild their homes.

Remove: Though economic revitalization made up only about 16 percent of the total unmet recovery need, it still resulted in an unmet need of over \$1 billion. HCD is therefore allocating \$40.7 million toward a workforce development grant program to meet the otherwise unmet needs of the workforce impacted by the 2018 fires.

Replace: Though economic revitalization made up only about 16 percent of the total unmet recovery need, it still resulted in an unmet need of over \$1 billion. HCD is therefore allocating \$46,542,372 toward a workforce development grant program to meet the otherwise unmet needs of the workforce impacted by the 2018 fires.

Remove: HCD will allocate \$86.2 million toward planning efforts and to support local capacity building.

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Replace: HCD has reallocated most of the original \$86.2 million, for planning efforts and support of local capacity building, to new housing and infrastructure programs. HCD has left \$782,160.67 allocated to the planning efforts.

2. Allocation of funds

Remove:

FIGURE 3: CDBG-DR PROGRAM BUDGET

PROGRAM	PROGRAM ALLOCATION	Percentage of Total
Total CDBG-DR	\$1,017,399,000	
Funds		
Housing Programs	\$480,794,752	47.3%
Infrastructure	\$347,428,488	34.1%
Economic	\$40,695,960	4%
Revitalization		
Program Delivery	\$66,392,850	6.5%
Planning	\$31,217,000	3.1%
Administration	\$50,869,950	5%
Total CDBG-DR	\$1,017,399,000	100
Funds		

Replace:

FIGURE 4: CDBG-DR PROGRAM BUDGET

PROGRAM	PROGRAM ALLOCATION	PERCENTAGE OF TOTAL
Total CDBG-DR Funds	\$1,017,399,000	
Housing Programs	\$529,855,816.20	52.08%
Infrastructure	\$389,348,700.80	38.27%
Economic	\$46,542,372.33	4.57%
Revitalization		
Program Delivery	\$0	0%
Planning	\$782,160.67	.08%
Administration	\$50,869,950	5.0%
Total CDBG-DR Funds	\$1,017,399,000	100.0%

3. Program Overviews

A. Housing Recovery Programs Remove:

Together, the housing programs will receive \$455,794,752 of the total CDBG-DR allocation. This

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represents approximately 57 percent of the CDBG-DR program funds allocated to the State of California.

Replace:

Together, the housing programs will receive \$529,855,816.20 of the total CDBG-DR allocation. This represents approximately 52 percent of the CDBG-DR program funds allocated to the State of California.

Owner Occupied Housing Rehabilitation and Reconstruction Program (page 138)

Remove:

1. Allocation Amount: \$205,107,638

Eighty (80) percent of funds must address unmet need in the HUD-identified "most impacted and distressed" counties.

Replace:

Allocation Amount: \$222,383,622.19

Eighty (80) percent of funds must address unmet need in the HUD-identified "most impacted and distressed" counties.

Owner Occupied Housing Rehabilitation and Reconstruction (page 139)

Remove: The maximum amount of assistance is \$500,000 per damaged structure, after applying any duplication of benefits to the cost of the total rehabilitation or reconstruction. Reconstruction is permissible where the total cost of rehabilitation is greater than the cost to reconstruct or where rehabilitation is otherwise technically infeasible. Reconstruction is defined as the rebuilding of a structure on the same site in substantially the same manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease.

Replace: Reconstruction is permissible where the total cost of rehabilitation is greater than \$100,000 or where rehabilitation is otherwise technically infeasible. Reconstruction is defined as the rebuilding of a structure on the same site in substantially the same manner. A reconstructed property must not increase the number of dwellings on site, although the number of rooms may increase or decrease. The maximum amount of assistance is \$750,000 per damaged structure, after applying any duplication of benefits to the cost of the total rehabilitation or reconstruction. Grant awards are capped at \$500,000, subsidized loans are capped at \$250,000, and together they may not exceed \$750,000.

Owner Occupied Housing Rehabilitation and Reconstruction (page 139)

Remove: As a standard practice, program applicants requiring more than the cap on assistance must fund the remainder of their project with private funds or other resources; however, exceptions to the maximum award will be considered on a case-by-case basis.

Replace: As a standard practice, program applicants requiring more than the assistance maximum must fund the remainder of their project with private funds or other resources;

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however, exceptions to the grant, loan, and combined award caps will be considered on a case-by-case basis.

Owner Occupied Housing Rehabilitation and Reconstruction (page 140)

Remove: To safeguard the CDBG-DR investment in the property, HCD will require a deed restriction or restrictive covenant on properties funded through the program. The deed restriction or restrictive covenant will remain in effect for a period of two years, following the date of receipt of the certificate of occupancy of the rehabilitated or reconstructed structure.

Replace: To safeguard the CDBG-DR investment in the property, HCD will require a deed restriction or restrictive covenant on properties funded through the program. The deed restriction or restrictive covenant will remain in effect for a period of two years for grants and five years for subsidized loans, following the date of receipt of the certificate of occupancy of the rehabilitated or reconstructed structure.

Owner Occupied Housing Rehabilitation and Reconstruction (page 144)

Remove: Assistance is provided in the form of a grant after a contractor has been selected to perform the scope. The scope of work is determined by a site inspection performed by qualified construction estimators. Once the scope of work has been determined, the applicant signs a three-party construction agreement between the applicant, contractor, and HCD. The assistance is provided based on approved construction inspections via two party check to the applicant and the contractor engaged to perform the work, or directly to the contractor depending on the program option selected by the applicant.

Replace: Assistance is provided in the form of grants and subsidized loans made to qualifying applicants after a contractor has been selected to perform the approved scope. Applicants receiving a subsidized loan will be provided loan disclosures as described in the program policy and procedures. The assistance is provided as reimbursement payments for costs incurred and expended. Once the scope of work has been determined, the applicant is issued an award offer which states the amount and form of assistance (grant or grant and loan). Applicants who accept their offer will then execute program grant and loan documents (as applicable).

Multifamily Housing Program (page 145)

Remove:

1. Unmet Needs

The unmet needs analysis identified significantly less damage to rental property than owner-occupied units. However, the impact to LMI populations were higher among renters than homeowners, and the State recognizes that renters are often harder to track, and the State is in need of additional affordable housing. Multifamily housing projects will be funded to address the unmet housing recovery need. Of the \$455,794,752 identified to address the housing recovery need, \$250,687,114 will be used to address the rental

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housing recovery need through multifamily housing development.

Replace:

1. Unmet Needs

The unmet needs analysis identified significantly less damage to rental property than owner-occupied units. However, the impact to LMI populations was higher among renters than homeowners, and the state recognizes that renters are often harder to track, and the state is in need of additional affordable housing. Multifamily housing projects will be funded to address the unmet housing recovery need. Of the \$529,855,816.20 identified to address the housing recovery need, \$281,139,507.36 will be used to address the rental housing recovery need through multifamily housing development.

Remove: Figure 93: Multifamily Housing Recovery By Subrecipient Allocation

	TOTAL APPLICANTS	% OF TOTAL	Original MF ALLOCATION	CHANGE (Phase II or Reallocation)	Current MF ALLOCATION
Total	12,775		\$250,687,114.00		\$250,687,114.00
Butte County	8,205	64.20%	\$161,008,827.43		\$178,982,374.42
Butte County	3,127	24.50%	\$61,361,926.06	\$9,823,547.00	\$71,185,473.06
Chico	1,656	13.00%	\$32,496,114.35		\$32,496,114.35
Gridley	122	1.00%	\$2,394,037.41		\$2,394,037.41
Oroville	451	3.50%	\$8,850,089.11	\$8,150,000.00	\$17,000,089.11
Paradise	2,849	22.30%	\$55,906,660.49		\$55,906,660.49
Lake County	511	4.00%	\$10,027,484.56		\$15,656,516.56
Lake County	387	3.00%	\$7,594,200.64	(\$7,594,200.64)	\$0.00
Clearlake				\$5,650,916.32	\$5,650,916.32
Lakeport	124	1.00%	\$2,433,283.92	\$7,572,316.32	\$10,005,600.24
Los Angeles County	1,498	11.70%	\$29,395,639.67		\$24,568,318.34
Los Angeles County	138	1.10%	\$2,708,009.53		\$2,708,009.53
Agoura Hills	246	1.90%	\$4,827,321.33	(\$4,827,321.33)	\$0.00
Calabasas	166	1.30%	\$3,257,460.74		\$3,257,460.74
Malibu	948	7.40%	\$18,602,848.07		\$18,602,848.07
Shasta County	1,183	9.30%	\$23,214,313.57		\$23,214,313.57
Shasta County	218	1.70%	\$4,277,870.13	\$745,683.78	\$5,023,553.91
Redding	849	6.60%	\$16,660,145.58		\$16,660,145.58
Anderson	38	0.30%	\$745,683.78	(\$745,683.78)	\$0.00
Shasta Lake	78	0.60%	\$1,530,614.08		\$1,530,614.08

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Ventura County	175	1.40%	\$3,434,070.05		\$3,434,070.05
Ventura County	87	0.70%	\$1,707,223.40	\$1,726,846.65	\$3,434,070.05
Thousand Oaks	88	0.70%	\$1,726,846.65	(\$1,726,846.65)	\$0.00
Phase II *	1,203	9.40%	\$23,606,778.72	-\$23,602,579.00	\$4,199.72

Replace:

FIGURE 93: MULTIFAMILY HOUSING RECOVERY BY SUBRECIPIENT ALLOCATION

	TOTAL APPLICANTS	% OF TOTAL	Original MF ALLOCATION	CHANGE (Phase II or Reallocation)	Current MF ALLOCATION
Total	12,775		\$250,687,114.00		\$250,687,114
Butte County	8,205	64.20%	\$161,008,827.43		\$178,982,373
Butte County	3,127	24.50%	\$61,361,926.06	\$9,823,547.00	\$71,185,473
Chico	1,656	13.00%	\$32,496,114.35		\$32,496,114
Gridley	122	1.00%	\$2,394,037.41		\$2,394,037
Oroville	451	3.50%	\$8,850,089.11	\$8,150,000.00	\$17,000,089
Paradise	2,849	22.30%	\$55,906,660.49		\$55,906,660
Lake County	511	4.00%	\$10,027,484.56		\$15,656,518
Lake County	387	3.00%	\$7,594,200.64	(\$7,594,200.64)	
Clearlake	-	-		\$5,650,916.32	\$5,650,917
Lakeport	124	1.00%	\$2,433,283.92	\$7,572,316.32	\$10,005,601
Los Angeles County	1,498	11.70%	\$29,395,639.67		\$24,568,318
Los Angeles					
County	138	1.10%	\$2,708,009.53		\$2,708,009
Agoura Hills	246	1.90%	\$4,827,321.33	(\$4,827,321.33)	
Calabasas	166	1.30%	\$3,257,460.74		\$3,257,461
Malibu	948	7.40%	\$18,602,848.07		\$18,602,848
Shasta County	1,183	9.30%	\$23,214,313.57		\$23,214,313
Shasta County	218	1.70%	\$4,277,870.13	\$745,683.78	\$5,023,554
Redding	849	6.60%	\$16,660,145.58		\$16,660,145
Anderson	38	0.30%	\$745,683.78	(\$745,683.78)	
Shasta Lake	78	0.60%	\$1,530,614.08		\$1,530,614
Ventura County	175	1.40%	\$3,434,070.05		\$3,434,070
Ventura County	87	0.70%	\$1,707,223.40	\$1,726,846.65	\$3,434,070
Thousand Oaks	88	0.70%	\$1,726,846.65	(\$1,726,846.65)	\$0.00
Phase II*	1,203	9.40%	\$28,434,100.72	-\$23,602,579.00	\$4,831,520.00

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Infrastructure Program (page 157)

Remove:

10. Unmet Needs

Funding stand-alone infrastructure projects that tie to DR-4382 or DR-4407 and the local portion of the non-federal share match on federal disaster-related grants in support of housing meet the requirement to address housing recovery needs first. Necessary infrastructure recovery must be complete before housing recovery is complete. The unmet needs assessment identified \$2,838,348,374 in unmet infrastructure recovery needs. Of the CDBG-DR funds received, \$317,428,488 will be used for Infrastructure Recovery Programs, which includes an estimated 38 percent of the total program allocation.

FIGURE 5: UNMET INFRASTRUCTURE RECOVERY NEED

CATEGORY	IDENTIFIED UNMET NEED	CDBG-DR FUNDED
Infrastructure Recovery	\$2,838,348,374	\$317,428,488

Replace:

10. Unmet Needs

Funding stand-alone infrastructure projects that tie to DR-4382 or DR-4407 and the local portion of the non-federal share match on federal disaster-related grants in support of housing meet the requirement to address housing recovery needs first. Necessary infrastructure recovery must be complete before housing recovery is complete. The unmet needs assessment identified \$2,838,348,374 in unmet infrastructure recovery needs. Of the CDBG-DR funds received, \$389,348,700.80 will be used for Infrastructure Recovery Programs, which includes an estimated 38 percent of the total program allocation.

FIGURE 6: UNMET INFRASTRUCTURE RECOVERY NEED

CATEGORY	IDENTIFIED UNMET NEED	CDBG-DR FUNDED
Infrastructure Recovery	\$2,838,348,374	\$389,348,700.80

Workforce Development Program (page 158)

Remove:

Workforce Development Program

Allocation Amount - HCD is allocating \$40,695,960 million to support workforce development in disaster impacted areas.

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Replace:

Workforce Development Program

Allocation Amount - HCD is allocating \$46,542,372.33 to support workforce development in disaster impacted areas.

Planning Program (page 168)

Remove:

A. Planning

Because of the recurring nature of wildfires in the impacted areas, planning efforts will be integral to a sound and long-term recovery process. HCD will make planning funds available to counties and impacted municipalities to fund resilience and mitigation planning efforts as well as updates to certain elements of the jurisdictions' General Plan. HCD encourages counties and municipalities to engage a broad range of stakeholders, from different sectors and community groups, in the 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 post-disaster planning.

HCD will also utilize planning funds to support necessary capacity building at the County and municipal levels, where needed. Planning activities also include those related to the preparation and revision of this CDBG-DR Action Plan and related public engagement to ensure awareness and understanding of the programs and activities outlined within this plan.

1. Eligible Activities

Disaster recovery presents affected communities with unique opportunities to examine a wide range of issues such as housing quality and availability, environmental issues, and the adequacy of existing infrastructure. With an eye to the future, HCD will support long-term plans put in place by local and regional communities that promote sound, sustainable, and equitable, long-term recovery planning informed by a forward looking evaluation of hazard risk, especially land-use decisions that reflect proactive fire mitigation management and adaptation. HCD supports planning efforts towards certification as a FireWise community focused on resilience and education of mitigating fire risks. HCD will coordinate as much as possible with local and regional planning efforts to ensure consistency, to promote community-level and/or regional (e.g., multiple local jurisdictions) post disaster recovery and mitigation, and to leverage those efforts.

2. Allocation Methodology

HCD plans to retain a portion of the planning funds for activities at the State level. HCD will procure technical assistance planning services to award to the local jurisdictions to increase capacity and create knowledge transfer. For the portion of planning allocated at the local level, HCD will award planning funds through a NOFA process to allow for eligible applicants to submit planning activities for funding.

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3. Delivery

Planning funds will be administered at both the State and Subrecipient levels.

4. Timeline

Planning activities will commence upon Action Plan approval and grant agreement execution between HUD and HCD. HCD will work immediately to procure planning support for the State and local governments. They will work on development of a NOFA to be issued in Q2 2021.

Replace:

A. Planning

Because of the recurring nature of wildfires in the impacted areas, planning efforts will be integral to a sound and long-term recovery process. Additionally, it is critical for all recovery planning projects to incorporate mitigation elements. Therefore, HCD will run all planning programs for 2018 under the Mitigation grant. Through the NOFA process outlined in the Mitigation Action Plan and Policies and Procedures, impacted jurisdictions are encouraged to submit eligible projects through the 2018 Mitigation NOFA. All further details are outlined in the Mitigation Action Plan No. 2 and the MIT Planning and Public Service policies and procedures.

III. Public Comment

In keeping with the State's Citizen Participation Plan, as articulated in Section 1 and 4, under Publication, of the initial HUD-approved Action Plan, HCD published this proposed Action Plan Amendment, Number 4, on the CDBG-DR Action Plan webpage (https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/action-plans-and-federal-register-notices-frns) in English and Spanish.

APA 4 will be available for public review and comment for thirty (30) days from May 1st through 5:00 p.m. Pacific Standard Time on June 1st, 2023.

Comments can be submitted by the following methods:

- Electronic mail to (DisasterRecovery@hcd.ca.gov); or
- Post mail to Disaster Recovery Section, Attn: Mona Akbar, HCD, 2020 West El Camino Avenue, Suite 200, Sacramento, CA 95833

If submitting comments via regular post mail, please factor delivery time into your mailing date. As above, all comments must be in writing and received by HCD by 5:00 p.m. Pacific Daylight Time on June 1st, 2023.

Residents who require a reasonable accommodation or other assistance to fully participate in the public comment process can request assistance by contacting the HCD Disaster Recovery Section via the same methods, listed above, for submission of public comments.

HCD will consider all public comments received, timely and in writing, via e-mail, or

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delivered in person at official public hearings regarding this Action Plan Amendment, Number 4. HCD will make public comments available to citizens, public agencies, and other interested parties upon request.

A summary of all comments received, timely, will be included in the final Substantial Action Plan Amendment, Number 4, submitted to HUD for approval. Following HUD approval, all comments received, timely during the public comment period will be noted and summarized in the final, comprehensive Action Plan, as amended.