



# COMMUNITY DEVELOPMENT BLOCK GRANT - DISASTER RECOVERY ACTION PLAN 2023 ACTION PLAN AMENDMENT NUMBER 2



California Department of Housing and  
Community Development

July 2025





STATE OF CALIFORNIA 2023 CDBG-DR ACTION PLAN  
AMENDMENT NUMBER 2  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

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**ACTION PLAN AMENDMENT TABLE**

<b>Amendment</b>	<b>Substantial or Non-Substantial</b>	<b>HUD Review/Approval</b>	<b>Summary of Changes</b>
<b>No. 1</b>	Non-substantial	February 10, 2025	<ul style="list-style-type: none"> <li>– Modified and removed some provisions for programs.</li> <li>– Added the projection of expenditures and outcomes to the Disaster Recovery Multifamily Housing Accelerator (DR-ACCEL) Program, Manufactured Housing Replacement and Elevation (MHRE) Program, and Mitigation Resiliency Infrastructure Program (MIT-RIP).</li> <li>– Changed the current \$10 million threshold for substantial amendments to \$30 million.</li> </ul>
<b>No. 2</b>	Substantial		<ul style="list-style-type: none"> <li>– Adding a top-up allocation of \$85,349,000 for DR-4683.</li> </ul>

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			<ul style="list-style-type: none"> <li>– Adding disaster recovery tie-back portion of the allocation of \$ 70,505,380 to the DR-ACCEL Program.</li> <li>– Modifying eligibility criteria for the DR-ACCEL Program to open the program up to more projects.</li> <li>– Redistributing \$5,881,971 million within the MHRE Program.</li> <li>– Adding \$4,256,058 of the top-up grant mitigation set-aside to the Mitigation Resiliency Infrastructure Program.</li> <li>– Adding \$6,320,112 of the top-up grant mitigation set-aside to an Owner-Occupied Mitigation (OOM) subgrant to Ventura County.</li> </ul>
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**SUMMARY OF CHANGES**

# STATE OF CALIFORNIA 2023 CDBG-DR ACTION PLAN

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### DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

The U.S. Department of Housing and Urban Development (HUD) allocated \$115,022,000 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 Declaration DR-4683 through the publication of the Federal Register, Vol. 88, November 27, 2023 ([88 FR 82982](#)). This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2023 (division B of Public Law 117-43) and allocates remaining funding made available through Public Law 117-32.

Additionally, under the authority of [Public Law 118-158](#), HUD announced on May 19, 2025, through the Federal Register publication ([90 FR 21328](#)). California would be receiving \$85,000,000 in additional CDBG-DR funding for the 2023 disaster, FEMA DR-4683. HUD has allocated a total of \$200,371,00 in CDBG-DR funds to the State of California in response to FEMA DR-4683.

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 2023 disasters ("2023 CDBG-DR-Action Plan"). This Action Plan Amendment will update the Action Plan subject to the requirements of HUD's CDBG-DR Universal Notice ("Universal Notice"), published on January 8, 2025, in the Federal Register at [90 FR 1754](#).

### **Action Plan Amendment Number 2**

Action Plan Amendment Number 2 (APA 2) is a substantial amendment that adds \$85,349,000, allocated as follows, along with these modifications:

1. Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL): Updates the unmet need for multifamily rental housing, adds \$70,565,200 disaster recovery tie-back funds to the DR-ACCEL Program and updates the Program eligibility criteria.
2. Manufactured Housing Replacement and Elevation Program (MHRE): Updates the unmet needs for the MHRE Program, redistributes \$5,881,971 of unallocated MHRE funds within the Program and increases the grant cap per eligible applicant from \$350,000 to \$500,000.
3. Mitigation Resiliency Infrastructure Program (MIT-RIP): This amendment modifies and removes provisions that are no longer applicable, updates the allocation to each subrecipient to reflect the correct funding amount, and adds projection of expenditures and outcomes.
4. Owner-Occupied Mitigation (OOM) Program: This amendment adds \$6,320,112 of mitigation set-aside funds to an OOM Program allocated to Ventura County.

## **Executive Summary**



# STATE OF CALIFORNIA 2023 CDBG-DR ACTION PLAN

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This Action Plan is subject to the requirements of HUD's CDBG-DR Universal Notice ("Universal Notice"), published on January 8, 2025, in the Federal Register at [90 FR 1754](#).

The U.S. Department of Housing and Urban Development (HUD) announced in November 2023 that the State of California will receive \$115,022,000 ([Public Law 117-328](#)) in funding to support long-term recovery efforts following [FEMA DR-4683](#) through the California Department of Housing and Community Development (HCD). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet need in California in the five most impacted and distressed counties.

Additionally, under the authority of [Public Law 118-158](#), HUD announced on May 19, 2025, through the Federal Register publication ([90 FR 21328](#)). California would be receiving \$85,000,000 in additional CDBG-DR funding for the 2023 disaster, FEMA DR-4683. HUD has allocated a total of \$200,371,00 in CDBG-DR funds to the State of California in response to FEMA DR-4683.

## Disaster Specific Overview

The 2023 water year began with continuation of the dry conditions that had characterized the three prior drought years, but a pattern shift occurred in late December with the arrival of an exceptionally strong atmospheric river storm. The remainder of the wet season was characterized by an abundance of atmospheric river storms in stark contrast to their relative paucity in the prior dry years. California received about half of its average annual precipitation between December 26 and January 19. Multiple state emergency proclamations were issued in March in response to the winter storms, resulting in most of the state's counties being covered by an emergency proclamation by the end of the month. The wet season's storm tracks favored the central and southern Sierra, resulting in 237 percent and 300 percent, respectively, of average snowpacks there. Some of the most significant flood damages also occurred in the middle part of the state.<sup>1</sup>

From late December 2022 through early April 2023, California endured at least 12 atmospheric river storms, corridors of air that can carry massive amounts of water over thousands of miles, producing cascading impacts including landslides, sinkholes and downed trees that damaged roads and homes. It is estimated that as of early January more than 34 million Californians were under a flood watch – about 90 percent of Californians and about 10 percent of the U.S. population. On January 9, downtown Los

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<sup>1</sup> [California Department of Water Resources. "Water Year 2023: Weather Whiplash, From Drought To Deluge" \(October 2023\).](#)

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Angeles was under a flash flood watch until midnight, an area of more than 7 million people.<sup>2</sup>

Parts of the central California coast got inundated with 1 to 1.25 inches of rainfall per hour, which triggered significant flooding, mudslides, debris flows and closed roadways. And hurricane-force wind gusts hit Oroville, California clocking in at 132-mph, the Weather Prediction Center said. For those at higher elevations, intense snow and ferocious winds were listed as being the biggest concerns. Parts of the higher elevations in the Sierra Nevada had gotten more than 100 inches – or 8.3 feet – of snow in just the previous few weeks, and later in January another 6 feet of snow was expected in some parts of the Sierra. California had experienced “more deaths in this flood storm since December 31 than we had in the last two fire seasons of the highest fire acreage burned in California.” At least 22 deaths were confirmed as storm related.

By the end of March 2023, the National Flood Insurance Program (NIFP) has paid out over \$26 million across 489 claims just for the storms and flooding that took place between December 27, 2022, and January 31, 2023.<sup>3</sup>

One of the hardest hit counties was Merced, especially the small town of Planada, in the central valley. The small, mostly Latino town was among the first to be flooded in January.

Researchers at [UC Merced’s Community and Labor Center](#) analyzed data from a community survey of 236 households. Researchers estimated more than 700 Planada households – about 83 percent of the town – experienced some type of economic loss from flooding on January 8, 2023. Before the flood, census data showed more than 35 percent of families lived below the poverty line, and 97 percent of the nearly 4,000 residents were Hispanic or Latino.

Some key takeaways from the study include:

- Only 17 percent of Planada households emerged unharmed without losing property or missing work.
- 41 percent of households had no property loss but had at least one worker miss work because of flooding. The median number of days of lost work per household was 21 days.
- Among households that lost work, 57 percent had no one eligible for unemployment insurance.

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<sup>2</sup> [Nouran Salahieh, Holly Yan and Haley Brink. “90% of Californians are under flood watches as another storm threatens mudslides, power outages and deadly inundation” CNN, January 9, 2023.](https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html)  
<https://www.cnn.com/2023/01/09/us/california-flooding-atmospheric-river-monday/index.html>

<sup>3</sup> [FEMA. “More than \\$26 Million Paid in National Flood Insurance Claims”, March 27, 2023,](https://www.fema.gov/press-release/20230327/more-26-million-paid-national-flood-insurance-claims)  
<https://www.fema.gov/press-release/20230327/more-26-million-paid-national-flood-insurance-claims>

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- Half the households are renters and 94 percent of them did not have flood insurance.
- An estimated 211 households lost at least one car, 95 lost a heating system and 108 lost a cooling system.
- About 56 percent of households with property damage said they now have issues with mold.
- More than one-quarter of renters said landlords increased their rent or threatened to evict them.
- About 43 percent of households that lost work or experienced property damage also reported falling behind on bills, such as rent or mortgage payments, utilities, or both. Unpaid bills averaged \$1,448 per household.<sup>4</sup>

### **Most Impacted and Distressed Areas**

#### *December through January Storms (DR-4683)*

On January 14, 2023, President Joseph R. Biden, Jr. declared that federal disaster assistance has been made available to the State of California to supplement state, local and tribal recovery efforts in the areas affected by severe winter storms, flooding, landslides, and mudslides beginning on December 27, 2022, and continuing.<sup>5</sup> All told, the declaration covered 14 counties, including Alameda, Amador, Calaveras, Contra Costa, Mendocino, Merced, Monterey, Sacramento, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Cruz, and Ventura.

As of January 25, 2023, Moody's catastrophe risk modeling estimated total U.S. economic losses from the recent California flooding at US \$5-7 billion. This estimate reflects inland flood impacts for the U.S. and includes property damage, contents, and business interruption, across residential, commercial, industrial, automobile and infrastructure assets.<sup>6</sup> The insured losses are anticipated to be between US\$0.5-1.5 billion, including losses to the National Flood Insurance Program (NFIP) and the private flood market. However, less than 2 percent of California households have flood insurance.

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<sup>4</sup> Foy, Nicole. "California flooding harmed 4 out of 5 households in this city. A study tallies the damage" CalMatters, June 15, 2023, <https://calmatters.org/california-divide/2023/06/california-flooding-3/>

<sup>5</sup> FEMA. "President Joseph R. Biden, Jr. Approves Major Disaster Declaration for California", January 15, 2023, <https://www.fema.gov/press-release/20230115/president-joseph-r-biden-jr-approves-major-disaster-declaration-california>

<sup>6</sup> Moody's. "Moody's RMS Estimates US\$5-7 Billion in Total U.S. Economic Losses from California Flooding", January 25, 2023, <https://www.rms.com/newsroom/press-releases/press-detail/2023-01-25/moodys-rms-estimates-us5-7-billion-in-total-us-economic-losses-from-california-flooding>

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The storms and damages from subsequent flooding resulted in the disaster becoming one of the first of 2023 to be included in the National Centers for Environmental Information's [list of billion-dollar disasters](#).<sup>7</sup>

#### Overview of the Impacts of the Qualifying Disaster

In April of 2018, UCLA released a study on California's extreme weather event future, which included a prediction of increased "extreme weather event whiplash," defined as the non-incremental transition between very dry and very wet weather. California's Fourth Extreme weather event Change Assessment projected that extreme weather event change will make forests more susceptible to extreme wildfires, especially if greenhouse gas emissions continue to rise and the miles of highways susceptible to coastal flooding in a 100-year storm event will triple from current levels to 370 miles with over 3,750 miles exposed to temporary flooding.<sup>8</sup>

The "whiplash" is evident in the 2022-2023 water year, which runs October through September. While a banner year for critically needed water, it also brought devastation throughout the state with floods, mudslides and debris flows. And while the California Department of Forestry and Fire Protection (CAL FIRE), is pleased that as of September 2023 the state has only seen about 276,000 acres burn so far this year, standing in stark contrast to 2020 and 2021 which were [California's worst wildfire seasons on record](#), with 4.3 million and 2.6 million acres burned, respectively, they are also very clear that fire season is now year-round and is not over. The state's most devastating fires have occurred in the fall and winter.

The [first winter outlook](#) from the National Oceanic and Atmospheric Administration (NOAA) predicts that a strong El Niño will remain in place through at least the spring, with further strengthening possible over the next couple of months. With a strong El Niño predicted for the coming year, there is above average precipitation forecasted for all of California and higher than average winter temperatures.<sup>9</sup> This means there is likely to be reduced snowpack as a collection and storage mechanism for all that water, leaving the vast majority of the stormwater as surface water in California's rivers, streams, and lakes, with accumulation in any low-lying areas. It also increases the likelihood of burn scars from previous fire sliding, and further saturation and erosion of hillsides and mountain areas inundated in the December 22 and January 23 storms. Obviously, this El Niño cycle has strong potential for adding to the devastation by

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<sup>7</sup> Center for Disaster Philanthropy. "California Storms", n.d., <https://disasterphilanthropy.org/disasters/california-storms/#:~:text=The%20series%20of%20winter%20storms%20in%20late%20December,than%20wildfires%20in%20the%20past%20two%20years%20combined.>

<sup>8</sup> FEMA. "President Joseph R. Biden, Jr. Approves Major Disaster Declaration for California", January 15, 2023, <https://www.fema.gov/press-release/20230115/president-joseph-r-biden-jr-approves-major-disaster-declaration-california>

<sup>9</sup> Smith, Hayley. "A warm, wet El Niño winter is in store for California and much of the U.S.", Los Angeles Times, October 19, 2023, <https://www.latimes.com/environment/story/2023-10-19/noaa-predicts-warm-wet-el-nino-winter-for-california-after-summer-of-record-heat>



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bringing another year of deluge, which will exacerbate the current impacts on every level.

The scope and severity of damage wrought by the 12 atmospheric rivers that inundated California between late December 2022, and the end of January 2023 is difficult to overstate. Those winter storms claimed 22 lives, inundated more than 5,102 buildings, dropped more than 27-million-acre feet of precipitation, battered the state with winds gusts up to 132 mph, prompted FEMA IA declarations for 15 counties, and forced the evacuation or displacement of thousands of residents.<sup>10</sup>

Key facts include:

- The series of winter storms in late December 2022 through mid-January 2023 caused [at least 22 storm-related deaths](#) across California, which is more lives lost than wildfires in the past two years combined.
- The California Geological Survey (CGS) said they had [counted more than 700 landslides](#) across the state between Dec. 30, 2022, and Jan. 23, 2023. [CGS said](#), “Large, deep-seated landslides can happen weeks to months after heavy rains and remain a hazard through the spring and summer.”
- The storms through January 2023 helped the Sierra Nevada region to [reach more than 200 percent of its typical snowpack](#) for that time of year, which eased immediate drought concerns.
- According to the National Weather Service Weather Prediction Center, the statewide [average rainfall for California](#) between December 26 and January 17 was 11.47 inches.
- Precipitation totals [broke records](#) including in San Francisco, which on Jan. 4 marked the wettest 10-day period since January 1862.
- Data from the California Department of Water Resources indicates that the state’s snowpack total for 2022-23 likely [surpassed the record set 40 years ago](#) in 1982-83. While the news was welcome in drought-ridden California, it does come with flooding risk.
- Following weeks of rain and snow, [short-term drought conditions and reservoir levels improved](#), but California is not in the clear when it comes to long-term drought. By early March the amount of water in the snowpack was expected to [continue to alleviate leftover drought conditions](#) but also contribute to ongoing flooding.
- Estimates from Moody’s put the [total U.S. economic losses](#) from the California flooding and severe weather in late December 2022 through mid-January 2023 at \$5 billion to \$7 billion. The flood’s damage [highlighted the need to address infrastructure](#), which requires significant resources.
  - The storms and damages from subsequent flooding resulted in the disaster becoming one of the first of 2023 to be included in the National Centers for Environmental Information’s [list of billion-dollar disasters](#).

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<sup>10</sup> [California Storms - Center for Disaster Philanthropy](#)

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- As California prepares for the 2023-2024 storm season, with a strong El Nino predicted for the coming year, there is above average precipitation forecasted for all of California and higher than average winter temperatures. This means there is likely to be reduced snowpack as a collection and storage mechanism for all that water, leaving the vast majority of the stormwater as surface water in California's rivers, streams, and lakes, with accumulation in any low-lying areas. It also increases the likelihood of burn scars from previous fires sliding, and further saturation and erosion of hillsides and mountain areas inundated in the December 22 and January 23 storms.

All these impacts further exacerbated the existing housing crisis in California. Communities impacted by the 2023 winter storms had near zero housing vacancies prior to disasters, limiting options for disaster survivors for either temporary or more long-term housing options. High housing costs resulted in rent-burdened households and many who live precariously close to homelessness.

Given the profound impacts and disruption wrought by the 2023 winter storms on the State of California, unmet needs in the state's Most Impacted and Distressed areas (MID) remain significant. HCD is committed to addressing these needs via pursuing additional resources, including state affordable housing funding, and leveraging other resources to support the statewide recovery effort. In addition, HCD continues to coordinate closely with local, state, and federal partners to collect and analyze data, identify resources, and understand how jurisdictions' unmet needs evolve over time.

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**Disaster Recovery Unmet and Mitigation Needs Assessment Summary**

The following table is updated to reflect the most recent information and data to date utilized to calculate the HUD unmet need methodology.

<b>Cost Categories</b>	<b>A</b>	<b>B</b>	<b>A-B</b>	
	<b>Direct and Indirect Need HUD METHOD</b>	<b>Financial Assistance Budgeted and Obligated</b>	<b>Unmet Need HUD METHOD</b>	<b>% of Unmet Needs</b>
<b>Rental Housing</b>	<b>\$2,272,523.00</b>	<b>\$0.00</b>	<b>\$2,272,523.00</b>	<b>1.81%</b>
<b>Owner-Occupied Housing</b>	<b>\$20,131,502.00</b>	<b>\$0.00</b>	<b>\$20,131,502.00</b>	<b>16.02%</b>
<b>Infrastructure</b>	<b>\$149,837,285.00</b>	<b>\$106,046,206.00</b>	<b>\$66,266,661.00</b>	<b>52.72%</b>
<b>Economic Development</b>	<b>\$74,204,380.00</b>	<b>\$37,172,882.00</b>	<b>\$37,031,498.00</b>	<b>29.46%</b>
<b>Total</b>	<b>\$246,445,690.00</b>	<b>\$143,219,088.00</b>	<b>\$125,702,184.00</b>	<b>100.00%</b>

Note: Owner Occupied: VFL Owner RP based on the losses HUD formula plus Owner PP losses 18,684,542 + 1,446,960; Rental Housing: PP Renter VFL; Infrastructure: FEMA PA C-G Categories; Economic development: VFL by HUD Categories Real Estate and Content

**Unmet Needs Assessment**

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The State of California completed the following needs assessment to identify the effects, long-term needs, and priorities for CDBG-DR funding allocated as a result of the 2023 disasters. The presidentially declared disaster covered by this needs assessment includes the FEMA declaration DR-4683.

The needs assessment includes specific details about unmet needs within the eligible and Most Impacted and Distressed communities. This includes details for housing, infrastructure, and economic revitalization. This assessment discusses additional types of assistance that may be available to affected communities and individuals, such as insurance, other federal assistance or other possible funding sources.

HCD understands that additional information may become available, and anticipates that if additional funds are allocated, there may be a different methodology for the distribution of funds. Adjustments to the Action Plan may be needed as a result of additional data or modified distribution methods; HCD will amend this assessment, and the Action Plan as needed in the future.

The table below lists the counties that FEMA designated for FEMA Individual Assistance (IA) following the disaster of 2023: DR-4683. FEMA IA designation allows the individuals and households in these counties to apply for financial and direct services after a federally declared disaster. These jurisdictions are also referred to as disaster-impacted counties.

**FEMA IA DECLARED COUNTIES**

<b>DR-4683</b>
Alameda, Amador, Calaveras, Contra Costa, Mendocino, Merced, Monterey, Sacramento, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Ventura

Source: FEMA

Within the FEMA IA declared counties, HUD will define the Most Impacted and Distressed (MID) areas. HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HUD determines MID areas using the following factors:

- Areas where FEMA has determined the damage was sufficient to declare the disaster are eligible to receive Individual and Households Program (IHP) funding.
- 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.



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- One or more county that meets the definition of Most Impacted and Distressed
- An aggregate of Most Impacted zip codes of \$10 million or more

HUD designated five counties (Merced, Santa Cruz, San Luis Obispo, San Joaquin, and Ventura) as MID areas from the DR-4683 disaster.

The Federal Register Notice provided clarification that, where HUD has identified an entire zip code as a MID area for the purposes of allocating funds, a grantee may expand program operations to the whole county or counties that overlap with that zip code. HCD proposes to expand eligibility to the county level for both identified zip codes. This expansion will allow housing recovery provided by this grant to help to minimize exposure to future risks for eventual beneficiaries. The zip codes identified in Ventura and Merced include large sections of land in designated floodplains. Our outreach has not identified significant infrastructure or other type of mitigation for these floodplains.

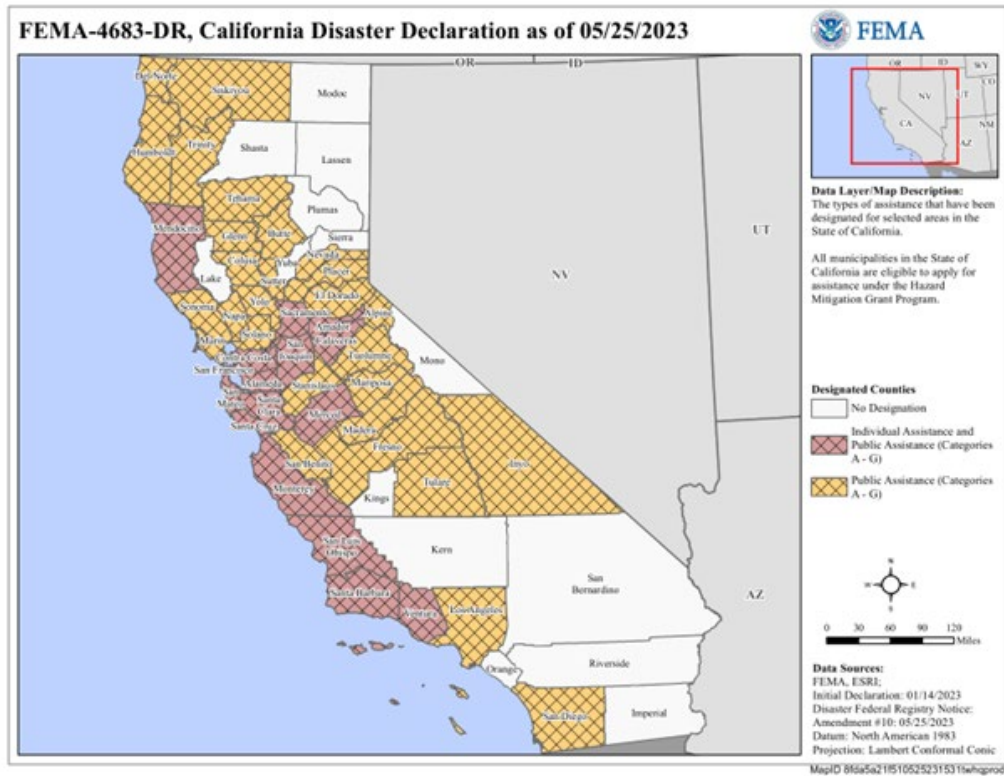
The table below lists the counties that FEMA designated for FEMA IA and the HUD MID counties following the disaster of 2023: DR-4683.

**FEMA IA DECLARED COUNTIES AND HUD  
MID**

<b>DR-4683</b>	<b>HUD MID</b>
Alameda	
Amador	
Calaveras	
Contra Costa	
Mendocino	
Merced	X
Monterey	
Sacramento	
San Joaquin	X
San Luis Obispo	X
San Mateo	
Santa Barbara	
Santa Clara	
Santa Cruz	X
Ventura	X

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The following map illustrates the FEMA DR-4683 Disaster Declaration Area



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The following map illustrates the FEMA declared disaster areas and the HUD MID counties for DR-4683.



## Legend

DR-4683

MID

IA/PA

County Boundary

DR-4683 Most Impacted and Distressed Areas (2023)



Data Source: FEMA

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## Housing Unmet Need

The DR-4683 led to impacts on housing in impacted areas. The geographic spread of the disaster across the State of California presents challenges for identifying consistent data to understand housing unmet needs. This section examines the data available to understand impacts to housing across the disaster area. Data related to housing cost burdens, increased rents, and impacts to Manufactured Housing Units (MHUs) is provided to identify post disaster housing recovery needs for susceptible populations.

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as “cost burdened.” Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation and childcare, and often lack adequate savings to spend on evacuation, shelter, or recovery from disaster scenarios. Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. Every disaster impacted county population is at least 35 percent cost burdened. Amador, San Joaquin, Santa Cruz and Merced County all have populations that are at least 50 percent cost burdened.

## HUD Unmet Needs Methodology

The following figure provides a summary of disaster impacts from DR-4683 using HUD’s unmet recovery needs methodology as outlined in the Federal Register Notice.

Cost Categories	A	B	A-B	
	Direct and Indirect Need HUD METHOD	Financial Assistance Budgeted and Obligated	Unmet Need HUD METHOD	% of Unmet Needs
Rental Housing	\$2,272,523.00	\$0.00	\$2,272,523.00	1.81%
Owner-Occupied Housing	\$20,131,502.00	\$0.00	\$20,131,502.00	16.02%
Infrastructure	\$149,837,285.00	\$106,046,206.00	\$66,266,661.00	52.72%
Economic Development	\$74,204,380.00	\$37,172,882.00	\$37,031,498.00	29.46%
Total	<b>\$246,445,690.00</b>	<b>\$143,219,088.00</b>	<b>\$125,702,184.00</b>	100.00%
Owner Occupied: VFL Owner RP based on the losses HUD formula plus Owner PP losses 18,684,542 + 1,446,960 Rental Housing: PP Renter VFL Infrastructure: FEMA PA C-G Categories Economic development: VFL by HUD Categories Real Estate and Content				



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Owner Occupied Housing Impacts DR-4683DR-4683 Owner Occupied Housing Impacts					
County	# FEMA Flood Verified Loss Properties	Estimated recovery needs	Repair and Rental Assistance FEMA	Remaining Unmet need	Percentage Unmet Needs
<b>Santa Cruz</b>	920	\$31,756,560	\$16,450,628	\$15,305,932	27%
<b>San Luis Obispo</b>	770	\$26,578,860	\$10,270,084	\$16,308,776	29%
<b>San Joaquin</b>	504	\$17,397,072	\$5,302,131	\$12,094,941	21%
<b>Merced</b>	485	\$16,741,230	\$6,343,725	\$10,397,505	18%
<b>Ventura</b>	192	\$6,627,456	\$3,720,359	\$2,907,097	5%
<b>Total</b>	<b>2,871</b>	<b>\$99,101,178</b>	<b>\$42,086,927</b>	<b>\$57,014,251</b>	<b>100%</b>
Sources: FEMA IA October 2023, UC Merced study.					

The data HUD uses to calculate unmet needs for 2023 and 2024 qualifying disasters come from the FEMA IHP data on housing unit damage as of November 20, 2024, and reflect disasters occurring in 2023 and declared on or before November 1, 2024.

## Alternate Methodology

The previous section provided a description of housing impacts from DR-4683 using HUD's approved methodology. However, as noted, the limited number of FEMA IA registrations with verified losses and the emphasis on stick-built homes do not capture the impacts to susceptible populations. Based on FEMA's damage assessment those living in manufactured homes and LMI renters are acutely susceptible population in the impacted areas and not accounted for in FEMA's datasets. Therefore, an alternative methodology is required for capturing an accurate portrait of unmet post disaster housing recovery needs for these susceptible populations. Many of the most susceptible populations faced technology or language barriers accessing FEMA resources. FEMA is attempting to address this issue for future disasters through the Interim Final Rules for IA programs released on January 22, 2024.

## HCD Alternative Unmet Needs Methodology

HCD's alternative unmet need methodology is updated utilizing the most recent data on housing, infrastructure, economic, and mitigation needs to calculate the remaining unmet need across the MID counties.

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	Direct and Indirect Need HCD METHOD	Financial Assistance Budgeted and Obligated	Unmet Need HCD METHODOLOGY	% of Unmet Needs
<b>Rental Housing</b>	\$3,600,084,262	\$436,710,447	\$3,163,373,815	94%
<b>Owner-Occupied Housing</b>	\$99,101,178	\$42,086,927	\$57,014,251	2%
<b>Infrastructure</b>	\$294,296,980	\$193,958,547	\$100,338,433	3%
<b>Economic Development</b>	\$74,204,380	\$37,172,882	\$ 37,031,498	1%
<b>Total</b>	\$4,067,686,800	\$709,928,803	\$3,357,757,997	100%
<p>Rental Housing: RHNA 6 cycle VLI and LI units needs multiplied by DR-MHP Loan Limit 2024 3 bdr. (+) DR-ACCEL requests (-) NOFA ALL MHP Awards 2022-2025, March 2025</p> <p>Owner Occupied: FEMA verified Loss Property Damage multiplied by UC Merced Method minus Repair and Rent Assistance provided, October 2023</p> <p>Economic Development: SBA Verified Loss minus amount disbursed, February 2025</p> <p>Infrastructure: PA and HMGP combined data (needs minuses funds obligated) PLUS standalone project data collected from MID counties, February 2025</p>				

Given the data challenges presented in the housing unmet needs section, including the limited FEMA IA and SBA home loan registrations, HCD proposes the following Alternative Methodology for a more holistic portrait of unmet recovery needs. HCD believes this shows a more accurate portrait of total housing impacts from the disasters. This narrative will draw on:

The unmet needs analysis reliance on FEMA and SBA data as required by the FRN creates two significant issues and negatively impacting the most susceptible community members with the biggest recovery needs. First, the prescribed FRN methodology over counts homeowners and under counts the impacts to renters. For DR-4683 FEMA IA Housing assistance totaled \$74,443,923 for owners, but only \$8,481,443 for renters. For MID HUD Counties and DR-4683 FEMA IA Housing assistance totaled \$40,701,182 for owners but only \$4,735,584 for renters. Other federal housing recovery programs, such as those provided by USDA also focus more on property owners and not renters. Yet renters, especially LMI renters face the largest obstacles to post disaster housing recovery. When landlords repair and rehab rental units, unless they are regulatory restricted, rents will raise making the disaster impacted rental unit unaffordable and inaccessible for prior LMI renters. Data continues to show increasing rents in DR-4683 MID counties since 2023.

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**Housing and Hazard Exposure in DR-4683 MID counties**

<b>Total Housing Units in High Fire &amp; Flood Hazard Areas</b>				
<b>DR-4683 MID County</b>	Units in High/Very High Fire Hazard Severity Zone (FHSZ)	Units in 100-year Special Flood Hazard Area	<b>Total in High Fire and Flood Hazard Areas</b>	<b>% Units in High Fire and Flood Hazard Areas</b>
<b>Merced</b>	7	19,295	<b>19,302</b>	<b>12.21%</b>
<b>Santa Cruz</b>	11,230	9,476	<b>20,706</b>	<b>13.10%</b>
<b>San Luis Obispo</b>	25,372	5,247	<b>30,619</b>	<b>19.37%</b>
<b>San Joaquin</b>	5	11,189	<b>11,194</b>	<b>7.08%</b>
<b>Ventura</b>	62,838	13,378	<b>76,216</b>	<b>48.23%</b>
<b>Totals</b>	99,452	58,585	<b>158,037</b>	100%

An assessment of total housing units across geographies of the five MID counties was examined to determine the total housing units in high hazard exposure areas for both flood and fire. This assessment contributed to the alternative unmet need assessment as a factor to determine where the most mitigation needs are for housing.

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**FEMA IA AWARD FOR HOUSING ASSISTANCE BY RENTER AND OWNER**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$ 7,221,999	\$ 1,323,125	\$ 8,545,124
Amador	\$ 994,034	\$ 115,131	\$ 1,109,165
Calaveras	\$ 818,438	\$ 51,263	\$ 869,701
Contra Costa	\$ 5,221,201	\$ 132,148	\$ 5,353,349
Mendocino	\$ 949,731	\$ 6,418	\$ 956,149
Merced	\$ 5,152,946	\$ 1,398,834	\$ 6,551,780
Monterey	\$ 2,676,505	\$ 561,191	\$ 3,237,696
Sacramento	\$ 3,373,220	\$ 420,731	\$ 3,793,951
San Joaquin	\$ 5,210,428	\$ 364,435	\$ 5,574,863
San Luis Obispo	\$ 10,469,024	\$ 593,122	\$ 11,062,146
San Mateo	\$ 6,793,016	\$ 572,766	\$ 7,365,782
Santa Barbara	\$ 4,985,911	\$ 526,192	\$ 5,512,103
Santa Clara	\$ 708,686	\$ 36,894	\$ 745,580
Santa Cruz	\$ 16,636,634	\$ 1,548,622	\$ 18,185,256
Ventura	\$ 3,232,150	\$ 830,571	\$ 4,062,721
<b>Total</b>	<b>\$ 74,443,923</b>	<b>\$ 8,481,443</b>	<b>\$ 82,925,366</b>

Source: FEMA, October 2023

## Disaster Case Management

Second, impacted populations with language or technology barriers, as well as those with non-traditional living arrangements were not able to qualify for FEMA aid. The presidential disaster declaration that authorized FEMA IA also served to trigger the Disaster Case Management program, whereby local and state government and private organizations could apply for funding to increase disaster case management services available for impacted individuals. The limitation to FEMA data is seen in the data provided by Disaster Case Manager Providers (DCMPs) deployed for DR-4683. DCMPs deployed for DR-4683 reporting working with the most susceptible populations including many seniors and renters with significant amount of housing uncertainty. DCMP data as of December 2023 identifies 485 renters and 268 owners in the populations, they are serving with unmet housing recovery needs.

Local government and community members provided critical services immediately after both disasters, evacuating neighborhoods, coordinating shelters and supplies, and getting information to displaced residents. Local public service providers in both DR-4683 -affected areas increased their capacity and organized together to serve the needs of the thousands of individuals and families that were impacted by the winter storms. Catholic Charities of California is the lead disaster case management organization for many counties in Northern and Central California recovering from DR-4683. Most households served by Catholic Charities were renters and had no



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insurance, and had not received FEMA, SBA, or supplemental grant funding. The value of the case management data is highlighted below to demonstrate the vulnerability and ultimate goals of the most impacted populations for DR-4683. The data provided by DCMPs continues to show unmet housing recovery needs for LMI renters in DR-4683 counties. The population served by DCMPs lack private resources or insurance to respond to their post disaster housing needs. This is heavily exacerbated by the housing crisis and lack of affordable rental units in DR-4683 counties.

**CASE MANAGEMENT HOUSING GOALS**

<b>Ultimate Housing Goals</b>	<b>DR-4683 Number</b>	<b>DR-4683 Percent</b>
Stay in County	697	81%
Stay, Renter	452	53%
Stay, Owner	220	26%
Stay, Undecided	23	3%
Stay, Other	2	0%
Leave County	8	1%
Leave, Renter	7	1%
Leave, Owner	0	0%
Leave, Undecided	1	0%
Leave, Other	0	0%
Unknown	48	6%

Source: DCMP December 2023. Catholic Charities.

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**DISASTER CASE MANAGEMENT VULNERABILITIES**

<b>Vulnerabilities</b>	<b>DR-4683 Number</b>	<b>DR-4683 Percent</b>
Urgent Basic Needs	341	40%
Immediate Medical Needs	27	3%
Safety Risk	93	11%
Housing Insecurity	175	20%
Poverty	171	20%
Unemployment	221	26%
Elderly (65+)	100	12%
Minor Child (w/o adult)	11	1%
Single Head of Household	54	6%
Disabled	98	11%
Uninsured/Underinsured	126	15%
Isolated	24	3%
Emotional Distress	111	13%
Limited Literacy	74	9%
Limited English	73	9%
Limited Transportation	12	1%
Limited Info. Access	7	1%
Functional Needs (AFN)	24	3%

Source: DCMP December 2023. Catholic Charities

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**DISASTER CASE MANAGEMENT NEEDS**

<b>Metric</b>	<b>DR-4683 Number</b>	<b>DR-4683 Percent</b>
Advocacy	259	30%
Clothing	282	33%
Children's Services	68	8%
Domestic Animal Services	13	2%
Education/Job Training	34	4%
Employment Assistance	155	18%
Emotional/Spiritual Care	110	13%
Functional Needs (AFN)	83	10%
Funeral Assistance	2	0%
Food/Nutrition	364	43%
Household Needs	351	41%
Legal Assistance	85	10%
Medical Assistance	22	3%
Medical Insurance	13	2%
Missing Person Assistance	0	0%
Removal of Debris	48	6%
Repair/Rebuild	225	26%
Transportation	58	7%
Utilities	182	21%

Source: DCMP December 2023, Catholic Charities

**SBA LOANS**

The SBA offers Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) to businesses to repair or replace disaster damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations such as charities, churches, and private universities are also eligible. The law limits these business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

The total verified loss for real estate for both federally declared disaster areas was \$124.5 million.

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**SBA HOME LOAN APPLICATIONS AND VERIFIED LOSS BY COUNTY**

<b>County</b>	<b>Total SBA Applications Submitted</b>	<b>Total SBA Loans Approved</b>	<b>SBA Total Verified Loss</b>
Alameda	417	204	\$ 11,100,751.45
Amador	80	28	\$ 1,502,238.71
Calaveras	88	33	\$ 2,673,041.31
Contra Costa	382	225	\$ 12,574,547.74
Mendocino	76	11	\$ 1,254,405.28
Merced	435	95	\$ 9,933,481.67
Monterey	132	50	\$ 3,666,944.08
Sacramento	507	157	\$ 10,403,988.88
San Joaquin	384	113	\$ 7,750,506.67
San Luis Obispo	549	247	\$ 16,365,341.13
San Mateo	268	147	\$ 9,122,677.80
Santa Barbara	329	132	\$ 9,330,161.64
Santa Clara	10	6	\$ 328,172.79
Santa Cruz	778	377	\$ 22,158,774.38
Ventura	314	64	\$ 6,369,942.97
<b>Total</b>	<b>4749</b>	<b>1889</b>	<b>\$ 124,534,976.50</b>

Source: Small Business Administration, Dec 2023

Within the most impacted and distressed areas, SBA has issued 2,460 applications with 896 being approved. The table below details the total approved amount for the MID counties at \$11,896,600.

HCD updated the following table with the most recent SBA verified loss data to reflect the overall unmet need that remains for the MID counties.

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SBA Verified Loss by HUD Categories MID County DR-4683

County	Sum of Total Real Estate and Content Verified Loss	Sum of Physical Amount Disbursed	Unmet Need	Unmet Need Percentage
Merced	\$7,769,720.00	\$3,132,300.00	\$4,637,420.00	12.52%
San Joaquin	\$8,510,599.17	\$5,509,900.00	\$3,000,699.17	8.10%
San Luis Obispo	\$21,585,310.66	\$9,715,600.00	\$11,869,710.66	32.05%
Santa Cruz	\$29,342,002.52	\$15,334,482.00	\$14,007,520.52	37.83%
Ventura	\$6,996,747.26	\$3,480,600.00	\$3,516,147.26	9.50%
<b>Total</b>	<b>\$74,204,379.61</b>	<b>\$37,172,882.00</b>	<b>\$37,031,497.61</b>	<b>100.00%</b>
Source: Small Business Administration, March 2025				

**TOTAL SBA BUSINESS LOANS APPROVED**

County	Sum of Total Verified Loss	Sum of Total Amount Disbursed	Unmet Need
Alameda	\$11,446,236.83	\$1,025,700.00	\$10,420,536.83
Amador	\$1,082,181.78	\$56,800.00	\$1,025,381.78
Calaveras	\$967,478.48	\$143,500.00	\$823,978.48
Contra Costa	\$2,152,863.63	\$213,400.00	\$1,939,463.63
Mendocino	\$551,647.06	\$115,100.00	\$436,547.06
Merced	\$24,527,488.30	\$1,186,000.00	\$23,341,488.30
Monterey	\$1,185,491.10	\$226,100.00	\$959,391.10
Sacramento	\$73,784.31	\$6,547.33	\$67,236.98
San Joaquin	\$8,006,657.86	\$2,528,300.00	\$5,478,357.86
San Luis Obispo	\$12,464,122.57	\$4,030,500.00	\$8,433,622.57
San Mateo	\$5,762,554.44	\$658,500.00	\$5,104,054.44
Santa Barbara	\$26,676,849.34	\$1,464,000.00	\$25,212,849.34
Santa Clara	\$3,736,590.00	\$0.00	\$3,736,590.00
Santa Cruz	\$12,526,465.87	\$2,866,000.00	\$9,660,465.87
Ventura	\$12,484,454.30	\$1,285,800.00	\$11,198,654.30
<b>Total</b>	<b>\$123,644,865.87</b>	<b>\$15,806,247.33</b>	<b>\$107,838,618.54</b>

Source: SBA, December 2023

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Additional SBA information for DR-4683 demonstrates landlord verified loss for real properties and the remaining unmet need. Landlords of multifamily buildings who received FEMA and SBA loans are still left with a large gap in unmet need for repair and recovery purposes. This has compounding impacts on the affected LMI and renter populations as these households are faced with increase in rents or the access to repaired housing units. The table below highlights the highest unmet needs are in Merced, Monterey, Sacramento and San Joaquin counties with Merced and San Joaquin being two counties designated as a MID county.

**LANDLORD VERIFIED LOSS OF REAL PROPERTY DAMAGE – BUSINESS/EIDL DATA**

<b>County</b>	<b>Total Landlord - VL</b>	<b>Total Disbursed</b>	<b>Unmet Need</b>	<b>Percent of Unmet Need</b>
Alameda	\$687,550	\$534,600	\$152,950	22.25%
Amador	\$59,873	\$50,000	\$9,873	16.49%
Calaveras	\$42,660	\$12,900	\$29,760	69.76%
Contra Costa	\$141,880	\$65,500	\$76,380	53.83%
Mendocino	\$110,793	\$115,100	-\$4,307	-3.89%
Merced	\$5,105,878	\$635,200	\$4,470,678	87.56%
Monterey	\$356,484	\$79,800	\$276,684	77.61%
Sacramento	\$1,723,718	\$469,100	\$1,254,618	72.79%
San Joaquin	\$427,912	\$98,500	\$329,412	76.98%
San Luis Obispo	\$1,829,067	\$1,217,900	\$611,167	33.41%
San Mateo	\$787,923	\$610,800	\$177,123	22.48%
Santa Barbara	\$721,917	\$640,200	\$81,717	11.32%
Santa Clara	\$0	\$0	\$0	0.00%
Santa Cruz	\$3,409,361	\$1,489,300	\$1,920,061	56.32%
Ventura	\$513,977	\$479,900	\$34,077	6.63%
<b>Total</b>	<b>\$15,918,993</b>	<b>\$6,498,800</b>	<b>\$9,420,191</b>	<b>59.18%</b>

Source: SBA Business/EIDL Data, according to NAICS Code – 2023

**LMI Households**

The information provided from DCMF data and outreach to local governments and stakeholders impacted by DR-4683 show how California's ongoing affordable housing crisis was exasperated by this disaster. The housing crisis demonstrated the low vacancy rates and a mismatch between housing costs and income, making communities more susceptible to recovering from disasters. In DR-4683 MID counties faced significant amounts of rent burden and overcrowding.



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**Overpayment (Housing Cost Burden)**

The table below illustrates the housing cost burden for both owner and renter households in the five MID counties of DR-4683. Current standards measure housing cost in relation to gross household income: households spending more than 30 percent of their income, including utilities, are generally considered to be overpaying or “cost burdened.” Severe overpaying occurs when households pay 50 percent or more of their gross income for housing. The impact of cost burden is exacerbated by disaster and disproportionately affects the low-income households, especially renters. This cost-burden is brought on by the historic lack of affordable housing in the impacted areas of DR-4683. These renter low-income households that are cost-burdened are not resilient to withstanding disaster recovery as they have insufficient resources to seek new housing and are at high risk for displacement.

**HOUSING COST BURDEN IN MID COUNTIES - DR-4683**

	California	Merced County	San Joaquin County	San Luis Obispo County	Santa Cruz County	Ventura County
Total:	13,550,586	87,830	241,903	111,713	96,015	278,631
Owner-occupied housing units:	7,565,502	51,369	153,146	68,511	57,911	182,466
Less than \$20,000:	419,236	3,831	8,335	4,707	3,360	8,403
30 percent or more	379,461	3,348	7,449	4,491	2,760	7,987
\$20,000 to \$34,999:	454,678	3,981	10,239	5,095	3,857	8,921
30 percent or more	320,761	2,761	7,430	3,306	2,306	7,049
\$35,000 to \$49,999:	490,930	4,783	11,484	5,108	2,693	11,171
30 percent or more	285,548	2,908	6,508	2,874	1,223	7,324
\$50,000 to \$74,999:	879,331	9,277	20,257	7,109	5,405	19,303
30 percent or more	436,256	3,737	9,162	2,184	2,790	9,578
\$75,000 or more:	5,248,939	28,513	101,881	46,492	42,008	132,190
30 percent or more	911,560	4,020	14,534	7,434	7,646	25,943
Zero or negative income	72,388	984	950	0	588	2,478

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<b>Renter-occupied housing units:</b>	5,985,084	36,461	88,757	43,202	38,104	96,165
Less than \$20,000:	787,034	6,102	12,490	6,472	5,685	10,258
30 percent or more	727,180	5,846	11,397	6,033	5,237	9,327
\$20,000 to \$34,999:	707,031	5,750	9,508	3,907	5,038	10,146
30 percent or more	653,544	5,068	9,120	3,610	4,494	9,016
\$35,000 to \$49,999:	640,021	3,637	12,359	4,985	3,534	11,446
30 percent or more	549,908	2,271	10,337	3,699	2,670	9,771
\$50,000 to \$74,999:	958,848	7,936	15,147	7,066	5,164	15,146
30 percent or more	667,392	3,022	8,554	5,561	3,553	12,716
\$75,000 or more:	2,583,155	9,659	33,336	18,433	16,773	44,698
30 percent or more	582,627	113	4,220	3,089	4,400	13,247
Zero or negative income	106,562	1,403	1,468	505	596	1,318
No cash rent	202,433	1,974	4,449	1,834	1,314	3,153

Source: U.S. Census Bureau. "Tenure by Housing Costs as a Percentage of Household Income in the Past 12 Months." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25106, 2022

## Flood Insurance and Tenure

FEMA and SBA housing assistance appears to have met the needs of single-family stick-built owners. HCD recognizes that there are some very limited numbers of homeowners who continue to face challenges in post disaster housing recovery. Limited information provided by local organizations does appear to indicate eligibility for CDBG-DR funds. Some homeowners are limited in their ability to rebuild due to ongoing flood plain management and levee repair discussions that have not been finalized at the time of this Action Plan. The rental housing stock impacted by DR-4683 was comprised of small landlords, who operated one or two single family rentals. No multifamily housing with five or greater housing units was impacted by DR-4683. These small landlords are not eligible for FEMA assistance for their rental units. With virtually no National Flood Insurance Program insurance coverage, small landlords will have to rely on capital markets to cover repair and rehabilitation of damaged units. With continued reports of rents increasing in MID counties, unless a unit is deed restricted it will not be affordable

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to prior tenants. Therefore, construction of new rental units is a key part of post disaster housing recovery from LMI renters impacted by DR-4683.

**FLOOD INSURANCE AND TENURE – DR-4683**

DR-4683	Total	With Flood Insurance	% of total	Without Flood Insurance	% of Total
Owners	16,097	1,290	8.0	14,807	92.0
Renters	8,255	166	1.4	8,139	98.6
No Tenure	221	13	5.9	208	94.1
Totals	24,573	1,419		23,154	

Source: FEMA FIDA Report 21196, April 2023

**Overcrowding**

Overcrowding is defined as a unit occupied by 1.01 persons or more per room (excluding bathrooms and kitchens) and units with severely overcrowded units are occupied by more than 1.5 persons per room. Overcrowding is directly related to the lack of availability of affordable housing stock in disaster impacted areas of DR-4683. As previously demonstrated, the direct relation of housing income and cost burden are tied to overcrowded households whereby low-income households struggle with cost burden are households that tend to be overcrowded, in particular, renter households impacted by disaster. Households overcrowded before the disaster were most prominent in Merced, San Joaquin and Ventura counties.

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**OVERCROWDED HOUSEHOLDS IN MID COUNTIES - DR-4683**

	<b>California</b>	<b>Merced County</b>	<b>San Joaquin County</b>	<b>San Luis Obispo County</b>	<b>Santa Cruz County</b>	<b>Ventura County</b>
	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>
<b>Total:</b>	13,550,586	87,830	241,903	111,713	96,015	278,631
<b>Owner occupied:</b>	7,565,502	51,369	153,146	68,511	57,911	182,466
0.50 or less occupants per room	5,047,547	30,918	94,380	50,763	38,866	129,404
0.51 to 1.00 occupants per room	2,175,576	17,343	48,768	15,826	16,925	44,935
1.01 to 1.50 occupants per room	245,855	2,176	7,572	1,635	1,595	6,299
1.51 to 2.00 occupants per room	69,554	652	1,861	239	352	1,187
2.01 or more occupants per room	26,970	280	565	48	173	641
<b>Renter occupied:</b>	5,985,084	36,461	88,757	43,202	38,104	96,165
0.50 or less occupants per room	2,804,056	16,742	40,786	24,177	17,179	43,837
0.51 to 1.00 occupants per room	2,405,487	14,279	37,329	15,754	16,155	40,811
1.01 to 1.50 occupants per room	434,042	3,400	7,593	2,007	2,721	6,588
1.51 to 2.00 occupants per room	243,934	828	2,347	1,038	1,104	3,269
2.01 or more occupants per room	97,565	1,212	702	226	945	1,660

Source: U.S. Census Bureau. "Tenure by Occupants per Room." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25014, 2022

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**OVERCROWDED BY PERCENT FOR MID COUNTIES - DR-4683**

County	Overcrowding -Total	Overcrowding -Owner	Overcrowding -Renter	Severe Overcrowding - Total	Severe Overcrowding - Owner	Severe Overcrowding - Renter
Ventura	7.05%	4.45%	11.98%	2.43%	1.00%	5.13%
San Joaquin	8.53%	6.53%	11.99%	2.26%	1.58%	3.44%
San Luis Obispo	4.65%	2.81%	7.57%	1.39%	0.42%	2.93%
Merced	9.73%	6.05%	14.92%	3.38%	1.81%	5.60%
Santa Cruz	7.18%	3.66%	12.52%	2.68%	0.91%	5.38%

Source: U.S. Census Bureau. "Tenure by Occupants per Room." American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B25014, 2022,

These impacts were evident during the immediate after math of DR-4683. The lack of available vacancies and large numbers of overcrowded. Seniors living in Arbor Mobile Home Park are reporting continued occupancy of damaged MHUs because there are not options for alternative housing with FEMA assistance provided. As highlighted by DR-4683 Housing Impact Assessment and Recovery Needs Analysis produced with the inter-agency recovery directorate which included emergency management agencies, as well as HUD staff deployed for DR-4683, the flood risk is most prominent in areas that are primarily rural and relies heavily on agriculture. Manufactured home units represent a significant portion of the non-deed restricted affordable housing stock in DR-4683 MID counties. As of March 2025, Santa Cruz and Ventura Counties reported that they no longer had unmet manufactured housing needs.

**MANUFACTURED HOUSING UNITS IMPACTED IN MID COUNTIES DR-4683 (March 2025)**

2023 MID Counties	Number of damaged MHU's	Total Unmet Need	Percent of Unmet Need
Santa Cruz	9	\$4,500,000	3%
Merced	105	\$52,500,000	35%
San Joaquin	121	\$60,500,000	41%
Ventura	4	\$2,000,000	1%
San Luis Obispo	57	\$28,500,000	20%
Totals	296	\$148,000,000	100%

Source(s): Local Disaster Case Managers, Impacted Mobilehome Park owners and HCD CDBG-DR 2017-2018 OOR Program

- Santa Cruz County: Santa Cruz County requested a reallocation of the funding originally provided to the County for the Manufactured Housing Replacement and Elevation (MHRE) Program. Citing a lack of unmet need for an MHRE program, Santa Cruz has identified a Resilient Infrastructure Program would better serve the recovery needs of their community. Data collected from multiple outreach efforts support the lack of an unmet need for a county administered MHRE

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program of large scale. Data provided by Disaster Case Managers suggests that a very low number of manufactured housing units (MHU's) in the county were still damaged as of November 2024. According to their estimates, only approximately 9 MHU owners in Santa Cruz County needed possible assistance. Additionally, in January 2025, HCD conducted outreach to 33 Mobilehome Park owners in Santa Cruz County. HCD connected with 16 of the 33 Mobilehome Park owners, all of whom reported zero flood related damages to units.

- **Ventura County:** Ventura County also requested a reallocation of the funding originally provided to the County in the MHRE program. Citing a lack of unmet need for an MHRE program, Ventura County identified an Owner-Occupied Mitigation (OOM) program would better serve the recovery needs of their community. Data collected by HCD from multiple outreach efforts support the lack of unmet need for an MHRE program in Ventura County. Data provided by Disaster Case Managers in November 2024 show a very low number of MHUs in Ventura County were still damaged. According to their estimates, approximately 4 MHU owners in Ventura County needed possible assistance. Additionally, in January 2025, HCD conducted outreach to 21 Mobilehome Park owners in Ventura County. HCD was able to connect with 7 of the 21 Mobilehome Park owners, all of whom reported zero flood related damage to units.

### **Pre-Disaster Housing Needs**

The flooding caused adverse impacts on lower-income communities particularly in Merced and Santa Cruz counties and compounded the state's historic lack of affordable housing stock for low- and moderate-income residents. The makeup of these residents includes susceptible populations such as farmworker seasonal workers and homeless populations that are acutely challenged to recover quickly from the loss of jobs and housing. Moreover this impacted pre-disaster housing stock and the geographic distribution of housing stock for farmworkers in rural agricultural as compared to more metropolitan areas where more housing choice and access are available is unique to the impacted areas of DR-4683.

The need for additional housing, in particular affordable housing with access and functional needs, is highlighted by the pre-disaster housing stock. In these areas, flooding intensified the lack of infrastructure and shortages of quality affordable housing. Farmworkers have significant and compounded impacts to the state's robust agriculture industry, which has cross-cutting and cascading impacts on housing. Reports from USDA on available vacancies in rental projects average 4 percent vacancy rate in Merced, San Joaquin, San Luis Obispo and Ventura counties as of January 2024. Santa Cruz county is not eligible for USDA funding.



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**USDA VACANCY RATE IN MID COUNTIES - DR-4683**

<b>MID County</b>	<b>Total USDA Rental Units</b>	<b>Available Vacancies (Jan 2024)</b>	
Merced	568	27	4.8%
Santa Cruz	N/A	N/A	
San Joaquin	31	3	9.7%
San Luis Obispo	352	12	3.4%
Ventura	160	4	2.5%
<b>Total</b>	<b>1111</b>	<b>46</b>	<b>4.1%</b>

Source: USDA Rural Development

Living within the MID areas of DR-4683 are the most susceptible populations which include high percentage of renter households that cover the following household characteristics.

- Survivors who live in manufactured housing/Mobile home housing
- Elderly Survivors
- Survivors with access and functional needs
- Homeless population

Overall, pre-disaster housing stock data availability and existing lack of affordable housing units were identified by all stakeholders as the key to equitable recovery from DR-4683.

### **Rent Increases**

The table below demonstrates the percent increase of rents in the five MID counties for DR-4683. Post-disaster increases in rents are often caused by the limited supply of units prior to a disaster. Tenants, especially renters, are most at risk of facing increasing housing cost due to the availability of units post-disaster. This scenario of having a limited supply of units and a rising housing cost more often lead to overcrowding of units in the disaster impacted areas.

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**OBSERVED RENT INCREASE FOR MID COUNTIES**

DR-4683 MID Counties	Zillow Observed Rent Index 12/31/2021	Zillow Observed Rent Index 12/31/2022	Since 12/31/21	Since 12/31/22	Percent Change Since 12/31/21	Percent Change Since 12/31/22
Ventura County	\$2,680.97	\$2,796.41	\$217.27	\$101.83	8.10%	3.64%
San Joaquin County	\$2,140.77	\$2,223.94	\$157.93	\$74.77	7.38%	3.36%
San Luis Obispo County	\$2,406.64	\$2,582.30	\$359.98	\$184.32	14.96%	7.14%
Merced County	\$1,783.38	\$1,838.96	\$125.28	\$69.70	7.02%	3.79%
Santa Cruz County	\$3,198.07	\$3,481.92	\$286.40	\$2.55	8.96%	0.07%

Source: Zillow

**Multifamily Housing Units - Regional Housing Need Allocation (RHNA)**

The State of California has made significant investment of state funds and enhanced planning and regulatory requirements to address the housing crisis. However, the scale of the housing crisis is much larger and needs greater than currently allocated for. This is especially important for LMI housing development. The table summarized the continued gap of LMI housing units as conducted by HCD's Housing Policy Division and implementation of state Housing Element law. The table below clearly indicates the continued housing gaps and that CDBG-DR resources allocated for this purpose will not be supplanting any other resources. Even with the state of California's investment of in LMI rental housing new construction, HCD is estimating a \$2.8 billion gap in funding.

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UNMET MULTIFAMILY RENTAL NEEDS (RHNA X MHP MAXIMUM LOAN LIMIT)

County	Total Units RHNA VLI and LI	Total Funding needed for VLI and LI (Loan Limit)	Resources Available per NOFAs Awards	Unmet Need (Totals RHNA less Resources)	% of Unmet Need
<b>Merced</b>	1756	\$646,566,224	\$80,221,882	\$566,344,342.00	20%
<b>Santa Cruz</b>	2468	\$908,727,472	\$88,850,920	\$819,876,552.00	28%
<b>San Luis Obispo</b>	1306	\$480,874,424	\$60,827,039	\$420,047,385.00	15%
<b>San Joaquin</b>	2969	\$1,093,197,676	\$41,887,276	\$1,051,310,400.00	36%
<b>Ventura</b>	544	\$200,302,976	\$164,923,330	\$35,379,646.00	1%
<b>All Totals</b>	<b>9043</b>	<b>\$3,329,668,772</b>	<b>\$436,710,447</b>	<b>\$2,892,958,325.00</b>	100.00%

Source: Rental Housing: RHNA 6 cycle VLI and LI units needs multiplied by DR-MHP Loan Limit 2024 3 bdr. (+) DR-ACCEL requests (-) NOFA ALL MHP Awards 2022-2025, March 2025

### Housing Recovery Programs

The alternative methodology proposed clearly demonstrate the need for post disaster housing recovery programs for addressing the needs of MHU owners as well as LMI renters. To allocate funds between housing programs for these two populations, HCD relied on data from DCMPs.

HCD's programs aim to focus on project readiness while expending allocated funds both quickly and efficiently to meet the needs of LMI individuals and communities within the grant timeline.

HCD proposes the following updates to the housing programs:

1. Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL): Update the unmet need for multifamily rental housing, add \$70,565,200 disaster recovery tie-back funds to the DR-ACCEL Program and update the Program eligibility criteria.
2. Manufactured Housing Replacement and Elevation Program (MHRE): Update the unmet needs for the MHRE Program, redistribute \$5,881,971 of unallocated MHRE funds within the Program and increase the grant cap per eligible applicant from \$350,000 to \$500,000.
3. Owner-Occupied Mitigation (OOM) Program: Add \$6,320,112 of mitigation set-aside funds to an OOM Program allocated to Ventura County.

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**Disaster Recovery Multifamily Accelerator Program (DR-ACCEL):**

	<b>Project</b>	<b>Developer</b>	<b>County</b>	<b>Affordable units</b>	<b>Funding Gap</b>
1	Waterstone	Pacific SW	Merced	59	\$ 14,654,238
2	Mercy Village	UP Holdings	Merced	69	\$ 21,077,941
3	Del Rio Ridge	Peoples Self-Help	San Luis Obispo	41	\$ 19,326,348
4	Paseo Paloma	Peoples Self-Help	San Luis Obispo	71	\$ 33,811,189
5	Hunter House	Service First of Northern CA	San Joaquin	119	\$ 27,525,993
6	Casa de Mariposa	Visionary Home Builders	San Joaquin	56	\$ 28,256,899
7	Beverly Gardens	Pacific Southwest	Santa Cruz	24	\$ 7,572,630
8	Capitola Manor	MidPen	Santa Cruz	51	\$ 23,238,094
9	525 Water Street	Kingdom Development	Santa Cruz	89	\$ 45,858,841
10	Aspire Apartments	Many Mansions	Ventura	87	\$ 24,751,918
11	Cypress Place	Peoples Self-Help	Ventura	59	\$ 22,790,122
12	Camino de Salud	Cabrillo Economic Dev. Corp.	Ventura	48	\$ 24,122,915
13	Fillmore Terrace	Peoples Self Help	Ventura	49	\$ 29,077,270
Total Gap/Unmet Need					\$ 322,064,398
Original Allocation					\$ 52,576,258
NEW Total Gap/Unmet Need					\$ 269,488,140

- An expedited approach by adding new funds into the existing DR-ACCEL program based on known needs and the identified unmet rental housing needs.

**Disaster Damage and Impacts.**

The DR-4683 led to significant impacts on housing in impacted areas. The geographic spread of the disasters across the State of California also presents challenges for identifying consistent data to understand housing unmet needs. This section examines the data available to understand impacts to housing across the disaster area.

Sources: FEMA Individual Assistance, SBA, the Census and American Community Survey, Continuum of Care Point-in-Time Counts, Centers for Disease data, Housing

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and Urban Development (HUD) income data, and insurance claim information provided by the California Department of Insurance (CDI).

The scope of the 2023 storm damage is unprecedented in California's recent history. 5,102 residences reported some level of flooding, 3,225 (63.2 percent) had a recorded high-water mark at the time of the FEMA inspection on the first floor of the residence. Sixteen residences experience water levels above the first floor of the residence. Of those with high water location on the first floor, 2,431 (75.4 percent) experienced 6 inches of water or less. An additional 1,450 (28.4percent) residences had high water locations recorded as being outside of the residence, suggesting that flood waters did not enter those residences but inundated their properties.

The 2023 storms claimed 22 lives, prompted FEMA IA declarations for 13 counties, and forced the evacuation or displacement of tens of thousands of residents.

California's financial resources and recovery infrastructure, which were already beleaguered by the slew of fire and fire-related environmental disasters and drought disasters in past years, and the global COVID-19 pandemic, are stretched thin. While the storms brought much needed water to the state, the historic drought and heavy drafting of ground water in the central valley over the years have caused severe subsidence issues. According to the US Geological Survey, subsidence has been recorded at over a foot per year in some locations, the effects of subsidence include damage to buildings and infrastructure, increased flood risk in low-lying areas, and lasting damage to groundwater aquifers and aquatic ecosystems.<sup>11</sup>

As California endures for the 2023-24 winter storm season, the effects of extreme weather event change show no signs of slowing, and areas already damaged by earlier fires, flooding/mudslides, and those susceptible to future disasters are bracing for continued challenges. The storms that comprised DR-4683 only further highlight the need for both disaster recovery and mitigation funding, planning, and program implementation in California's impacted and susceptible areas.

All these impacts further exacerbated the existing housing crisis in California. Communities impacted by pre-existing impacts of disasters over the last five years, and the 2023 storms had near zero housing vacancies prior to disasters, limiting options for disaster survivors for either temporary or more long-term housing options. High housing costs and record inflation have resulted in rent-burdened households and many who live precariously close to homelessness.

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<sup>11</sup> USGS. "Measuring Land Subsidence in California", n.d, <https://www.usgs.gov/centers/land-subsidence-in-california#:~:text=The%20effects%20of%20subsidence%20include,groundwater%20aquifers%20and%20aquatic%20ecosystems.>

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## Limitation of Data

This section presents an analysis of FEMA IA, SBA, and CDI data to reflect damage caused by DR-4683 and to demonstrate the ongoing unmet recovery needs of residents impacted by the disasters. Ultimately, no one data source accurately captures the population impacted by DR-4683. This Action Plan and unmet needs analysis captures a point in time and reflects the best available data at the time of its publication.

- **FEMA Individual Assistance (IA)** – The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. Residents register voluntarily for FEMA IA, and eligible applicants include both renters and owners. FEMA Verified Loss awards only provide assistance for repair and replacement to make the home habitable. As the data limitations above note, residents must register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. While the FEMA-IA dataset alone does not represent the full scale of the disaster impacts, data available at the household level, including income and damage, allows for an analysis that follows the unmet needs calculation outlined in the Federal Register Notice.
- **Small Business Administration** – Similar to FEMA IA, the SBA disaster loan program is a voluntary program available to impacted households. As a loan program, SBA residential loan registrations skew towards homeowners. However, compared to FVL inspections, which only cover the cost for repair and replacement, SBA loan amounts are based on an inspection that covers the full cost to restore a home.
- **California Department of Insurance Claims (CDI)** – While floods and hurricanes can rely on National Flood Insurance Program data, fire damage must be collected from individual insurance companies. HCD requested address level insurance claim information for disaster impacted households through the CDI, but household level information on claims was not available. However, the CA Department of Insurance collected information from individual insurance companies on claims by zip code. As better data becomes available, HCD will provide an updated estimate of claims by household. This data covers a large period of time and does not guarantee that claims are disaster related.
- **American Community Survey 2022 (ACS-5 Year) and Decennial Census (DEC 2020)** – The American Community Survey (ACS) is ongoing and updated annually and is based on a sample of United States residents (3.5 million) in the 50 states. The ACS asks more comprehensive questions than the ten-year census with the goal of “providing current information to communities every year for programs, economic development, emergency management, and understanding local issues and conditions”. The decennial census, on the other hand, is conducted every ten years and counts every person living in the United States. The census asks a shorter set of questions concerning age, sex, race, Hispanic origin, and owner/renter status. The goal of the census is to “provide an official count of the population and provide critical data that lawmakers and many



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others use to provide daily services, products, and support for communities.”<sup>12</sup> Both the ACS and DEC data are displayed at a county level in this report and therefore, may aggregate the data in a way that obscures important details. For example, poverty rate may be low at a County-level but concentrated in just a few zip codes which may be more susceptible.

- **Homeless Point-In-Time Count** – The Point-In-Time (PIT) Count is an annual count conducted by every Continuum of Care (CoC) in the country over the course of a single night in January. It counts the number of people housed in emergency shelters, transitional housing, Safe Havens, and the number of people who are unsheltered. Because the count only takes place on one day, it is a static count and may not reflect annual numbers. Because point-in-time counts include the number of people sleeping outside and in shelters, they often undercount the “hidden homeless” - people experiencing homelessness who are sleeping in motels, on friends’ couches, in cars, etc. This count often underestimates children and families experiencing homelessness.<sup>13</sup>
- **Low- and Moderate-Income Data** – This data is available on HUD Exchange at the block group, census tract, and county level. The limitation of this data is that the LMI calculations come from the 2011-2015 ACS data and may be outdated. Percent LMI is used to determine if programs meet national objectives for Community Development Block Grant funding. According to the description of the LMI data provided, the statistical information used in the calculation of estimates identified in the data sets comes from two sources: 1) the 2011-2015 American Community Survey (ACS), and 2) the Income Limits for Metropolitan Areas and for Non-Metropolitan Counties. The data necessary to determine an LMI percentage for an area is not published in the publicly available ACS data tables. Therefore, the Bureau of Census matches family size, income, and the income limits in a special tabulation to produce the estimates.<sup>14</sup>

**Housing and Urban Development (HUD) Income Limit Data** – This data is available on HUD Exchange at the block group, census tract, and county level. The HUD limits calculate the very low (50 percent) income limit, extremely low-income limits, and low (80 percent) income limits for 1 person to 8 person families for every county and state in the United States. The limits are recalculated annually to determine eligibility for public housing, section 8 vouchers, and disabilities and elderly programs.<sup>15</sup>

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<sup>12</sup> U.S Census Bureau. “Understanding and Using the American Community Survey Public Use Microdata Sample Files”, February 2021, [https://www.census.gov/content/dam/Census/library/publications/2021/acs/acs\\_pums\\_handbook\\_2021.pdf](https://www.census.gov/content/dam/Census/library/publications/2021/acs/acs_pums_handbook_2021.pdf).

<sup>13</sup> Agans, Robert P. et al. “Enumerating the Hidden Homeless: Strategies to Estimate the Homeless Gone Missing From a Point-in-Time Count” *Journal of Official Statistics*, vol.30, no.2, 2014, pp.215-229, <https://sciendoc.com/article/10.2478/jos-2014-0014>

<sup>14</sup> HUD. “FY 2023 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data”, n.d., <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

<sup>15</sup> HUD. “Income Limits”, May 15, 2023, [https://www.huduser.gov/portal/datasets/il.html#2021\\_query](https://www.huduser.gov/portal/datasets/il.html#2021_query)

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**(1) Single Family v. Multi-Family Needs; Owner Occupied v. Tenant**

HCD will implement a suite of housing recovery programs to address the unmet recovery need in the HUD MID areas: a Manufactured Housing Replacement and Elevation Program focused on MHUs in Mobilehome Parks only, and a Disaster Recovery Multifamily Housing Program. Further details are provided in this Action Plan in the Housing Recovery Programs section.

For the 2023 disaster year, housing programs will receive \$94,267,900, while mitigation programs will receive \$15,003,000.

**Affordable Rents**

Eligibility of multifamily project proposals to be funded by CDBG-DR will be assessed by HCD. Specific eligibility criteria will identify projects that have received funding commitments but continue to have a financial gap in reaching construction and occupancy. HCD is proposing to establish an accelerator program based on affordable rents at the annual Multifamily Tax Credit Subsidy Projects (MTSP) Regular Income and Rent Limits published by HCD annually for each county, to determine rent limits. For those units that are planned for extremely low-income maximum households, HCD is proposing to establish program affordable rents at the CTCAC rents for 30 percent area median income (AMI) for each applicable area.

HCD will determine the number of units or funding gap in an approved multifamily development that will be leased to tenants with an income of up to 80 percent of the AMI based on regulatory and program requirements.

New construction, rehabilitation, or reconstruction of affordable rental housing projects shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55 years.

**FEMA Individual Assistance**

The Federal Emergency Management Agency (FEMA) Individual Assistance Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees. However, as the data limitations above note, residents must voluntarily register with FEMA for assistance, which leaves a gap between the true disaster impacts and the households that register for assistance. Despite these limitations, the following section provides an overview of the housing impacts for FEMA Disaster 4683. Across the disaster areas, a total of 25,067 households registered for FEMA IA assistance, including 16,459 owner-occupied households and 8,380 renter households. The 2023 FRN outlines the following damage categories by owner-occupied and rental units:

**FEMA Inspected Owner Units**

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- Minor-Low: Less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage.
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Owner Units - Personal Property

- Minor-Low: Less than \$2,500 of FEMA inspected personal property damage.
- Minor-High: \$2,500 to \$3,499 of FEMA inspected personal property damage.
- Major-Low: \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- Major-High: \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

FEMA Inspected Rental Units

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of "Moderate" damage by the FEMA inspector.
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of "Major" damage by the FEMA inspector.
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of "Destroyed" by the FEMA inspector.

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**TOTAL FEMA IA REGISTRATIONS DR-4683**

Disaster	Owner	Renter	Unknown	Grand Total
DR-4683	16459	8380	228	25067

Source: FEMA, Oct 2023

While total registrations show the scale and scope of the disaster impacts, FEMA Verified Loss provides a more accurate understanding of households that not only registered for FEMA but also inspected by FEMA for a documented loss related to the disaster, a FEMA Verified Loss. The following figure provides an overview of the number of FEMA Verified Losses over \$0 for both owner-occupied and renter-occupied units.

**FEMA INDIVIDUAL ASSISTANCE BY RENTER AND OWNER - DR-4683**

Disaster Declaration	Owner	Renter	Unknown	Total
<b>DR-4683</b>	<b>16,459.00</b>	<b>8,380.00</b>	<b>228</b>	<b>25,067.00</b>
Alameda	1559	626	33	<b>2218</b>
Amador	227	94	1	<b>322</b>
Calaveras	345	93	6	<b>444</b>
Contra Costa	1369	243	17	<b>1629</b>
Mendocino	258	53	3	<b>314</b>
Merced	1204	1969	38	<b>3211</b>
Monterey	568	503	0	<b>1071</b>
Sacramento	2433	1142	17	<b>3592</b>
San Joaquin	1482	731	6	<b>2219</b>
San Luis Obispo	1834	650	25	<b>2509</b>
San Mateo	1086	273	16	<b>1375</b>
Santa Barbara	1104	500	22	<b>1626</b>
Santa Clara	245	81	3	<b>329</b>
Santa Cruz	2057	868	28	<b>2953</b>
Ventura	688	554	13	<b>1255</b>

Source: FEMA, Oct 2023

The previous figure provides an overview of the total count of FEMA IA Verified Losses, but to understand the costs measured through data collected by FEMA, the following provides an overview of average FEMA Verified Losses for properties with over \$0 in losses. This figure includes both Personal Property (Renter) and Real Property (Owner) damages. These numbers do not reflect the total cost needed for reconstruction of owner-occupied or renter-occupied households.

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**AVERAGE FEMA IA VERIFIED LOSS - OVER \$0 DR-4683**

<b>Disaster Declaration</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
<b>DR-4683</b>	\$36,070,010.67	\$3,458,797.44	\$39,528,808.11

Source: FEMA, Oct 2023

**Impact on Renters**

Through FEMA IA, renters are eligible to apply for monthly rental assistance and for funding to replace damaged or destroyed personal property. FEMA does not inspect rental properties for real property damage, so the following table only includes personal property damage. The following figure shows the number of renters who registered for FEMA IA that have a Verified Loss over \$0 of personal property damage. The table shows the number of renter-occupied households by County and HUD-defined damage category.

**FEMA IA RENTERS - LOSS OVER \$0 WITH PERSONAL PROPERTY DAMAGE -  
HUD DAMAGE CATEGORY - DR-4683**

<b>Disaster Declaration</b>	<b>Minor-Low</b>	<b>Minor-High</b>	<b>Major-Low</b>	<b>Major-High</b>	<b>Severe</b>	<b>Grand Total</b>
<b>DR-4683</b>	<b>7370</b>	<b>513</b>	<b>304</b>	<b>99</b>	<b>36</b>	<b>8322</b>
Alameda	585	23	10	6	3	627
Amador	77	3	3	10	1	94
Calaveras	86	5	2	0	0	93
Contra Costa	232	4	2	3	2	243
Mendocino	52	1	0	0	0	53
Merced	1706	102	101			1909
Monterey	429	48	21	3	2	503
Sacramento	1071	50	15	4	2	1142
San Joaquin	661	35	18	13	4	731
San Luis Obispo	559	44	29	10	8	650
San Mateo	217	23	19	12	2	273
Santa Barbara	432	39	16	7	6	500
Santa Clara	76	2	1	1	1	81
Santa Cruz	746	48	43	27	5	869
Ventura	441	86	24	3	0	554

Source: FEMA, Oct 2023

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**FEMA IA Owner, LOSS OVER \$0 WITH PERSONAL PROPERTY DAMAGE, BY HUD  
 DAMAGE CATEGORY**

<b>Disaster Declaration</b>	<b>Minor-Low</b>	<b>Minor-High</b>	<b>Major-Low</b>	<b>Major-High</b>	<b>Severe</b>	<b>Grand Total</b>
<b>DR-4683</b>	<b>15805</b>	<b>356</b>	<b>182</b>	<b>79</b>	<b>34</b>	<b>16456</b>
Alameda	1526	23	8	2	0	1559
Amador	223	3	0	1	0	227
Calaveras	331	8	5	1	0	345
Contra Costa	1353	12	1	1	1	1368
Mendocino	255	1	1	0	0	257
Merced	1063	55	43	31	12	1204
Monterey	544	15	6	1	1	567
Sacramento	2406	19	7	1	0	2433
San Joaquin	1423	28	21	7	3	1482
San Luis Obispo	1736	55	28	9	6	1834
San Mateo	1005	38	29	11	3	1086
Santa Barbara	1081	14	4	1	4	1104
Santa Clara	243	2	0	0	0	245
Santa Cruz	1952	69	25	9	2	2057
Ventura	664	14	4	4	2	688

Source: FEMA, Oct 2023



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**FEMA IA Owner, LOSS OVER \$0 WITH REAL PROPERTY DAMAGE, BY HUD  
DAMAGE CATEGORY**

<b>Disaster Declaration</b>	<b>Minor-Low</b>	<b>Minor-High</b>	<b>Major-Low</b>	<b>Major-High</b>	<b>Severe</b>	<b>Grand Total</b>
<b>DR-4683</b>	<b>13,700</b>	<b>1,367</b>	<b>1,057</b>	<b>288</b>	<b>47</b>	<b>16,459</b>
Alameda	1327	110	104	14	4	1559
Amador	179	25	18	5	0	227
Calaveras	292	39	9	4	1	345
Contra Costa	1218	64	66	20	1	1369
Mendocino	220	24	11	3	0	258
Merced	883	145	151	22	3	1204
Monterey	428	71	54	13	2	568
Sacramento	2216	159	45	13	0	2433
San Joaquin	1231	163	73	12	3	1482
San Luis Obispo	1399	204	179	46	6	1834
San Mateo	880	91	88	24	3	1086
Santa Barbara	986	64	40	12	2	1104
Santa Clara	216	12	14	3	0	245
Santa Cruz	1633	151	167	88	18	2057
Ventura	592	45	38	9	4	688

Source: FEMA, Oct 2023

**Average FEMA IA Verified Loss for Personal Property by Renter and Owner**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$143,833.80	\$158,838.62	\$302,672.42
Amador	\$24,776.82	\$101,824.22	\$126,601.04
Calaveras	\$47,135.01	\$21,888.48	\$69,023.49
Contra Costa	\$96,457.97	\$61,098.96	\$157,556.93
Mendocino	\$18,110.11	\$5,675.45	\$23,785.56
Merced	\$542,717.32	\$938,275.89	\$1,480,993.21
Monterey	\$75,610.26	\$201,102.55	\$276,712.81
Sacramento	\$133,399.15	\$209,503.39	\$342,902.54
San Joaquin	\$218,814.99	\$261,670.23	\$480,485.22
San Luis Obispo	\$314,208.37	\$306,481.51	\$620,689.88
San Mateo	\$266,219.96	\$186,247.98	\$452,467.94
Santa Barbara	\$119,759.31	\$231,698.31	\$351,457.62
Santa Clara	\$15,679.55	\$23,168.45	\$38,848.00
Santa Cruz	\$289,254.72	\$415,207.33	\$704,462.05
Ventura	\$106,056.04	\$336,116.07	\$442,172.11
<b>Total</b>	<b>\$2,412,033.38</b>	<b>\$3,458,797.44</b>	<b>\$5,870,830.82</b>

Source: FEMA, Oct 2023

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**Average FEMA IA Verified Loss for Real Property by Renter and Owner**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$2,873,106.20	\$0.00	\$2,873,106.20
Amador	\$535,091.92	\$0.00	\$535,091.92
Calaveras	\$573,407.91	\$0.00	\$573,407.91
Contra Costa	\$2,256,655.16	\$0.00	\$2,256,655.16
Mendocino	\$443,786.39	\$0.00	\$443,786.39
Merced	\$3,460,943.88	\$0.00	\$3,460,943.88
Monterey	\$1,670,092.38	\$0.00	\$1,670,092.38
Sacramento	\$2,193,294.96	\$0.00	\$2,193,294.96
San Joaquin	\$2,549,261.65	\$0.00	\$2,549,261.65
San Luis Obispo	\$4,969,742.29	\$0.00	\$4,969,742.29
San Mateo	\$2,617,108.47	\$0.00	\$2,617,108.47
Santa Barbara	\$1,615,789.44	\$0.00	\$1,615,789.44
Santa Clara	\$310,649.04	\$0.00	\$310,649.04
Santa Cruz	\$6,393,372.63	\$0.00	\$6,393,372.63
Ventura	\$1,195,674.97	\$0.00	\$1,195,674.97
<b>Total</b>	<b>\$33,657,977.29</b>	<b>\$0.00</b>	<b>\$33,657,977.29</b>

Source: FEMA, Oct 2023

**FEMA IA Award for Personal Property by Renter and Owner**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$25,788.66	\$53,752.77	\$79,541.43
Amador	\$8,276.31	\$93,107.86	\$101,384.17
Calaveras	\$21,271.45	\$5,470.42	\$26,741.87
Contra Costa	\$3,686.45	\$20,167.77	\$23,854.22
Mendocino	\$3,725.45	\$2,680.45	\$6,405.90
Merced	\$235,734.09	\$676,810.64	\$912,544.73
Monterey	\$24,483.44	\$115,244.31	\$139,727.75
Sacramento	\$38,553.78	\$91,201.45	\$129,755.23
San Joaquin	\$87,691.08	\$120,493.93	\$208,185.01
San Luis Obispo	\$83,845.12	\$106,357.79	\$190,202.91
San Mateo	\$74,543.13	\$87,694.77	\$162,237.90
Santa Barbara	\$27,767.05	\$122,961.53	\$150,728.58
Santa Clara	\$1,891.95	\$2,117.59	\$4,009.54
Santa Cruz	\$80,050.14	\$257,516.92	\$337,567.06
Ventura	\$44,468.72	\$124,776.26	\$169,244.98
<b>Total</b>	<b>\$761,776.82</b>	<b>\$1,880,354.46</b>	<b>\$2,642,131.28</b>

Source: FEMA, Oct 2023

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**FEMA IA Award for Repair by Renter and Owner**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$3,550,261.22	\$0.00	\$3,550,261.22
Amador	\$609,254.80	\$0.00	\$609,254.80
Calaveras	\$582,731.26	\$0.00	\$582,731.26
Contra Costa	\$2,587,325.65	\$0.00	\$2,587,325.65
Mendocino	\$617,004.24	\$0.00	\$617,004.24
Merced	\$2,524,244.07	\$0.00	\$2,524,244.07
Monterey	\$1,200,668.71	\$0.00	\$1,200,668.71
Sacramento	\$1,550,561.62	\$0.00	\$1,550,561.62
San Joaquin	\$2,578,191.63	\$0.00	\$2,580,820.38
San Luis Obispo	\$6,005,586.64	\$0.00	\$6,008,178.19
San Mateo	\$3,036,768.53	\$0.00	\$3,036,768.53
Santa Barbara	\$2,449,839.60	\$0.00	\$2,449,839.60
Santa Clara	\$194,689.02	\$0.00	\$194,689.02
Santa Cruz	\$8,566,626.18	\$0.00	\$8,566,626.18
Ventura	\$1,481,880.11	\$0.00	\$1,481,880.11
<b>Total</b>	<b>\$37,535,633.28</b>	<b>\$0.00</b>	<b>\$37,540,853.58</b>

Source: FEMA, Oct 2023

**FEMA IA Award for Housing Assistance by Renter and Owner**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$ 7,221,999	\$ 1,323,125	\$ 8,545,124
Amador	\$ 994,034	\$ 115,131	\$ 1,109,165
Calaveras	\$ 818,438	\$ 51,263	\$ 869,701
Contra Costa	\$ 5,221,201	\$ 132,148	\$ 5,353,349
Mendocino	\$ 949,731	\$ 6,418	\$ 956,149
Merced	\$ 5,152,946	\$ 1,398,834	\$ 6,551,780
Monterey	\$ 2,676,505	\$ 561,191	\$ 3,237,696
Sacramento	\$ 3,373,220	\$ 420,731	\$ 3,793,951
San Joaquin	\$ 5,210,428	\$ 364,435	\$ 5,574,863
San Luis Obispo	\$ 10,469,024	\$ 593,122	\$ 11,062,146
San Mateo	\$ 6,793,016	\$ 572,766	\$ 7,365,782
Santa Barbara	\$ 4,985,911	\$ 526,192	\$ 5,512,103
Santa Clara	\$ 708,686	\$ 36,894	\$ 745,580
Santa Cruz	\$ 16,636,634	\$ 1,548,622	\$ 18,185,256
Ventura	\$ 3,232,150	\$ 830,571	\$ 4,062,721
<b>Total</b>	<b>\$ 74,443,923</b>	<b>\$ 8,481,443</b>	<b>\$ 82,925,366</b>

Source: FEMA, Oct 2023

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**FEMA IA Award for Replace by Renter and Owner**

<b>County</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>
Alameda	\$0.00	\$0.00	\$0.00
Amador	\$0.00	\$0.00	\$0.00
Calaveras	\$0.00	\$0.00	\$0.00
Contra Costa	\$0.00	\$0.00	\$0.00
Mendocino	\$0.00	\$0.00	\$0.00
Merced	\$0.00	\$0.00	\$0.00
Monterey	\$0.00	\$0.00	\$0.00
Sacramento	\$0.00	\$0.00	\$0.00
San Joaquin	\$0.00	\$0.00	\$0.00
San Luis Obispo	\$0.00	\$0.00	\$0.00
San Mateo	\$0.00	\$0.00	\$0.00
Santa Barbara	\$0.00	\$0.00	\$0.00
Santa Clara	\$0.00	\$0.00	\$0.00
Santa Cruz	\$0.00	\$0.00	\$0.00
Ventura	\$0.00	\$0.00	\$0.00
<b>Total</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

Source: FEMA, Oct 2023

### **Small Business Administration Loans**

Small Business Administration Housing (SBA) loans are the basic form of federal disaster assistance for homeowners with good credit history and income, and whose private property sustained damage that is not fully covered by insurance. Homeowners and renters whose property was damaged by a presidentially declared disaster are eligible to apply for an SBA low-interest loan. Interest rates on these loans are determined by law and are assigned on a case-by-case basis. Households in DR-4683 impacted counties submitted a total of 4749 applications, but to date only 1889 have been approved. The figures below give an overview of total applications, approvals, and total SBA Verified Losses by county.

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**SBA HOME LOAN APPLICATIONS AND VERIFIED LOSS BY COUNTY (DR-4683)**

<b>County</b>	<b>Total SBA Applications Submitted</b>	<b>Total SBA Loans Approved</b>	<b>SBA Total Verified Loss</b>
Alameda	417	204	\$ 11,100,751.45
Amador	80	28	\$ 1,502,238.71
Calaveras	88	33	\$ 2,673,041.31
Contra Costa	382	225	\$ 12,574,547.74
Mendocino	76	11	\$ 1,254,405.28
Merced	435	95	\$ 9,933,481.67
Monterey	132	50	\$ 3,666,944.08
Sacramento	507	157	\$ 10,403,988.88
San Joaquin	384	113	\$ 7,750,506.67
San Luis Obispo	549	247	\$ 16,365,341.13
San Mateo	268	147	\$ 9,122,677.80
Santa Barbara	329	132	\$ 9,330,161.64
Santa Clara	10	6	\$ 328,172.79
Santa Cruz	778	377	\$ 22,158,774.38
Ventura	314	64	\$ 6,369,942.97
<b>Total</b>	<b>4749</b>	<b>1889</b>	<b>\$ 124,534,976.50</b>

Source: Small Business Administration, Dec 2023

**Summary of Housing Impacts**

Using the methodology provided by HUD in the 2023 FRN, the following figure provides the baseline calculation for housing unmet needs in counties impacted by the 2023 disasters in California.

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**HOUSING UNMET NEED - HUD METHODOLOGY**

Damage Category	Owner	Owner	Renter	Renter	Total	Total
	Count	Total Damage	Count	Total Damage	Count	Total Damage
Major-Low	1239	\$12,991,494.89	304	\$849,952.72	1,543	\$13,841,447.61
Major-High	367	\$5,953,734.42	99	\$769,242.23	466	\$6,722,976.65
Severe	81	\$270,387.30	36	\$490,148.61	117	\$760,535.91
<b>Total</b>	<b>1687</b>	<b>\$19,215,616.61</b>	<b>439</b>	<b>\$2,109,343.56</b>	<b>2,126</b>	<b>\$21,324,960.17</b>

**Impacts to Owner Occupied Housing Units DR-4683**

County	# FEMA Flood Verified Loss Properties	Estimated recovery needs	Repair and Rental Assistance FEMA	Remaining Unmet need	Percentage Unmet Needs
<b>Santa Cruz</b>	920	\$31,756,560	\$16,450,628	\$15,305,932	27%
<b>San Luis Obispo</b>	770	\$26,578,860	\$10,270,084	\$16,308,776	29%
<b>San Joaquin</b>	504	\$17,397,072	\$5,302,131	\$12,094,941	21%
<b>Merced</b>	485	\$16,741,230	\$6,343,725	\$10,397,505	18%
<b>Ventura</b>	192	\$6,627,456	\$3,720,359	\$2,907,097	5%
<b>Total</b>	<b>2,871</b>	<b>\$99,101,178</b>	<b>\$42,086,927</b>	<b>\$57,014,251</b>	<b>100%</b>
Sources: FEMA IA October 2023, UC Merced study.					

## Housing Tenure

A Harvard University study entitled “America’s Rental Housing 2022” posited that renters are uniquely susceptible to extreme weather event change and related disasters because renters receive less assistance after disasters than homeowners. The study cited a 2019 HUD analysis of CDBG-DR-funded recovery examples, which showed that only an eighth of housing activities funding went to affordable rental construction or rental assistance. They also found that renter households often lack the “financial resources to evacuate, information about disaster risks, and adequate insurance cover.”<sup>16</sup> A 2017 survey showed that nearly 40 percent of renters did not have the funds

<sup>16</sup> Joint Center for Housing Studies of Harvard University. “America’s Rental Housing”, 2024, [https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard\\_JCHS\\_Americas\\_Rental\\_Housing\\_2024.pdf](https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Americas_Rental_Housing_2024.pdf)

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necessary to evacuate in a disaster - more than three times the percent of homeowners.<sup>17</sup>

Every county impacted by the 2023 disasters is an owner-occupied majority county. At the same time, renters make up a significant portion of every county's population, with the most renter-occupied housing units in Alameda, Merced, Monterey, Sacramento, San Mateo, Santa Barbara, Santa Clara, San Joaquin, and Santa Cruz which all have 40 percent or more renter-occupied housing units.

### HOUSING TENURE BY COUNTY

County	Owner-Occupied Housing Units	Owner-Occupied Housing Units	Renter-Occupied Housing Units	Renter-Occupied Housing Units
<b>DR-4683</b>	2,121,552		1,498,261	
Alameda	317,451	54.2%	268,367	45.8%
Amador	12,440	79.0%	3,305	21.0%
Calaveras	14,114	82.1%	3,084	17.9%
Contra Costa	274,388	67.2%	134,149	32.8%
Mendocino	21,044	60.9%	13,513	39.1%
Merced	44,156	53.4%	38,604	46.6%
Monterey	68,359	52.2%	62,614	47.8%
Sacramento	328,664	58.3%	235,192	41.7%
San Joaquin	142,391	60.0%	95,032	40.0%
San Luis Obispo	67,031	62.0%	41,068	38.0%
San Mateo	157,368	59.5%	106,955	40.5%
Santa Barbara	78,168	52.8%	69,864	47.2%
Santa Clara	361,551	55.6%	288,801	44.4%
Santa Cruz	57,852	60.0%	38,635	40.0%
Ventura	176,575	64.1%	99,078	35.9%

Source: U.S. Census Bureau 2018-2022 American Community Survey, 5 Year Estimates

### Median House Value

After disasters, areas that were affected by or adjacent to disaster incidents often experience a statistically significant decline in housing value.<sup>18</sup> The table below established the median housing values in impacted counties before the floods of 2023. The pre-2023 median house values for disaster-impacted counties range from around

<sup>17</sup> Joint Center for Housing Studies of Harvard University. "America's Rental Housing", 2017, [https://www.jchs.harvard.edu/sites/default/files/harvard\\_jchs\\_americas\\_rental\\_housing\\_2017\\_0.pdf](https://www.jchs.harvard.edu/sites/default/files/harvard_jchs_americas_rental_housing_2017_0.pdf)

<sup>18</sup> Katherine A. Kiel and Victor A. Matheson, "The Effect of Natural Disasters on Housing Prices: An Examination of the Fourmile Canyon Fire," Journal of Forest Economics 33 (December 2018): pp. 1-7, <https://doi.org/10.1016/j.jfe.2018.09.002>.

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\$400,000 (Amador, Calaveras, Mendocino, Sacramento, San Joaquin) to a high range of \$999,000 for Alameda and \$1,400,000 for San Mateo County.

**MEDIAN HOUSE VALUE - OWNER OCCUPIED HOUSING**

<b>DR-4683 County</b>	<b>Median Value</b>
Alameda	\$999,200
Amador	\$409,600
Calaveras	\$404,200
Contra Costa	\$787,300
Mendocino	\$463,700
Merced	\$342,300
Monterey	\$683,700
Sacramento	\$465,900
San Joaquin	\$462,000
San Luis Obispo	\$726,700
San Mateo	\$1,441,300
Santa Barbara	\$714,800
Santa Clara	\$1,316,800
Santa Cruz	\$951,300
Ventura	\$719,100

Source: U.S. Census Bureau 2018-2022 American Community Survey, 5 Year Estimates



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**MEDIAN GROSS RENT – DR-4683**

<b>DR-4683 County</b>	<b>Median Gross Rent</b>
Alameda	\$2,229
Amador	\$1,257
Calaveras	\$1,621
Contra Costa	\$2,234
Mendocino	\$1,240
Merced	\$1,200
Monterey	\$1,873
Sacramento	\$1,599
San Joaquin	\$1,542
San Luis Obispo	\$1,800
San Mateo	\$2,805
Santa Barbara	\$1,964
Santa Clara	\$2,719
Santa Cruz	\$2,094
Ventura	\$2,140

Source: U.S. Census Bureau 2018-2022 American Community Survey, 5 Year Estimates

**(2) Public Housing and Affordable Housing.**

**MULTIFAMILY ASSISTED HOUSING - 2023**

<b>Type Of Damage</b>	<b># of Properties</b>	<b># of Units</b>	<b># of Units Assisted</b>	<b># of Units Waiting Assistance</b>	<b>Remaining Unmet Need</b>
Minor-Low	0.00	0.00	0.00	0.00	\$0.00
Minor-High	0.00	0.00	0.00	0.00	\$0.00
Major-Low	0.00	0.00	0.00	0.00	\$0.00
Major-High	0.00	0.00	0.00	0.00	\$0.00
Severe	0.00	0.00	0.00	0.00	\$0.00
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>\$0.00</b>

Source(s): <https://hudgis-hud.opendata.arcgis.com/datasets/multifamily-properties-assisted/explore>, Accessed 2023

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**PUBLIC HOUSING AUTHORITIES DAMAGED - 2023**

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Alameda	0.00	0.00	0.00	\$0.00
Amador	0.00	0.00	0.00	\$0.00
Calaveras	0.00	0.00	0.00	\$0.00
Contra Costa	0.00	0.00	0.00	\$0.00
Mendocino	0.00	0.00	0.00	\$0.00
Merced	421	0.00	0.00	\$0.00
Monterey	0.00	0.00	0.00	\$0.00
Sacramento	0.00	0.00	0.00	\$0.00
San Joaquin	992	0.00	0.00	\$0.00
San Luis Obispo	1,000	0.00	0.00	\$0.00
San Mateo	0.00	0.00	0.00	\$0.00
Santa Barbara	0.00	0.00	0.00	\$0.00
Santa Clara	0.00	0.00	0.00	\$0.00
Santa Cruz	379	0.00	0.00	\$0.00
Ventura	1,176	0.00	0.00	\$0.00
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>\$0.00</b>

Source(s): HUD Public Housing Authorities, <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::public-housing-developments/explore>

**Multifamily Assisted Housing**

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	0.00	0.00	0.00	0.00	\$0.00
Minor-High	0.00	0.00	0.00	0.00	\$0.00
Major-Low	0.00	0.00	0.00	0.00	\$0.00
Major-High	0.00	0.00	0.00	0.00	\$0.00
Severe	0.00	0.00	0.00	0.00	\$0.00
<b>Total</b>	<b>0.</b>	<b>0.</b>	<b>0.</b>	<b>0.</b>	<b>\$0.00</b>

Source(s): No Damage Data Reported. FEMA does not inspect rental units for real property damage, so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.

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**Public Housing Authorities Damaged**

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Merced	421	0	0	\$0.00
San Joaquin	992	0	0	\$0.00
San Luis Obispo	1,000	0	0	\$0.00
Santa Cruz	379	0	0	\$0.00
Ventura	1,176	0	0	\$0.00
<b>Total</b>	<b>3,968</b>	<b>0</b>	<b>0</b>	<b>\$0.00</b>

Source(s): No Damage Data Reported. No Unit number data were reported from San Luis Obispo and Santa Cruz Counties.

**Poverty Rate**

People living in poverty are disproportionately affected by disasters. People in poverty are more likely to be exposed to disasters due to a higher likelihood to live in riskier areas – disaster risk and a history of redlining nonwhite, lower income populations to high-risk areas makes homes in riskier areas more accessible and less expensive for people in poverty.

Of the counties impacted by DR-4683, Merced, Mendocino and Calaveras counties have the highest poverty rates, with more than 10 percent of the population living in poverty. San Mateo, Santa Clara, and Amador have the lowest poverty rates, with less than 8 percent of the population living in poverty. In total, the disaster impacted over 3,000,000 people living in poverty across all impacted counties.

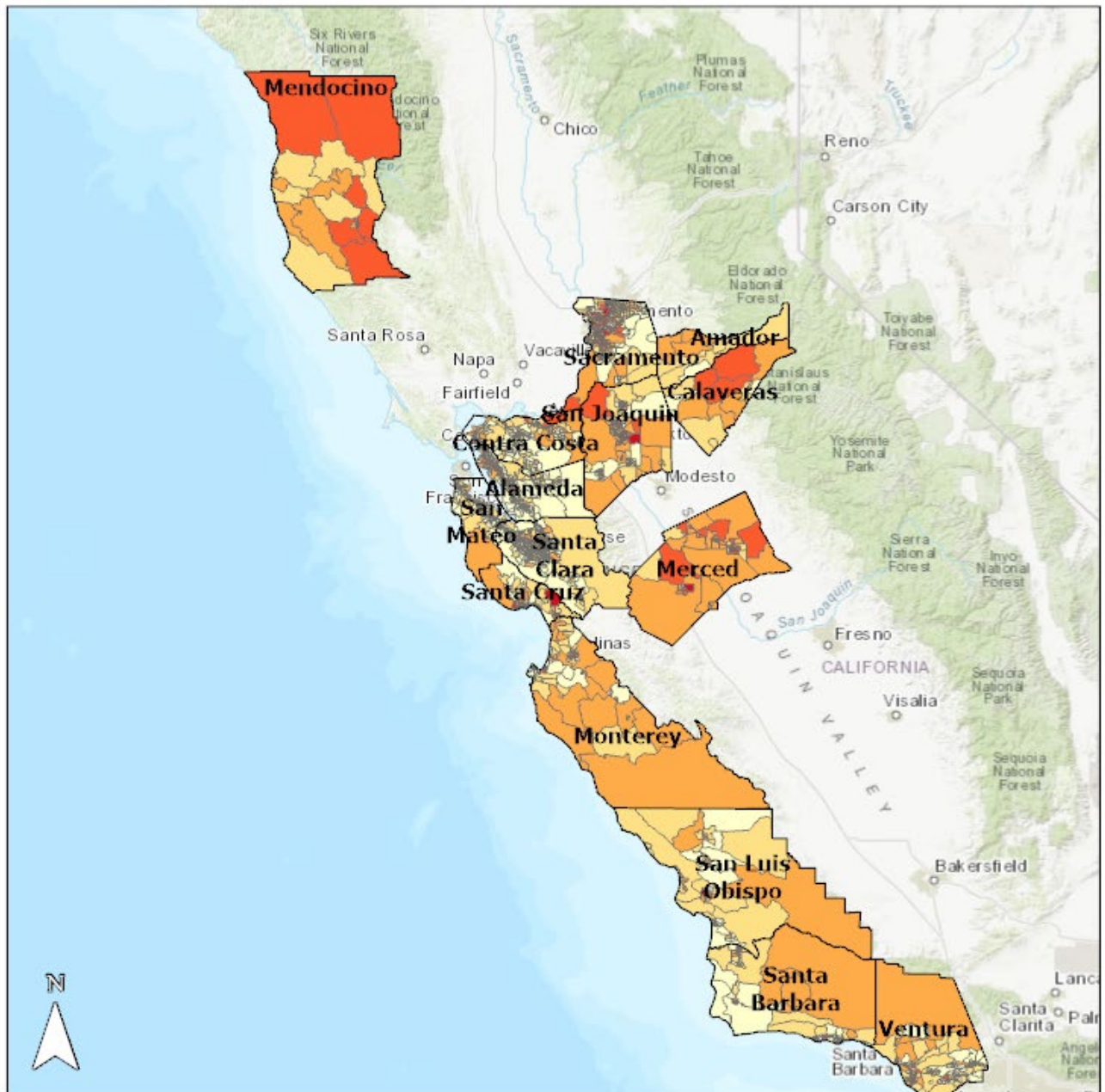
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**DR-4683 POVERTY RATE BY COUNTY**

<b>County</b>	<b>Total Household</b>	<b>Below poverty level</b>	<b>Percent below poverty level</b>
Alameda	32,220	585,818	5.5%
Amador	677	15,745	4.3%
Calaveras	1,410	17,198	8.2%
Contra Costa	23,287	408,537	5.7%
Mendocino	3,974	34,557	11.5%
Merced	12,828	82,760	15.5%
Monterey	11,788	130,973	9.0%
Sacramento	52,439	563,856	9.3%
San Joaquin	23,980	237,423	10.1%
San Luis Obispo	6,594	108,099	6.1%
San Mateo	10,309	264,323	3.9%
Santa Barbara	10,806	148,032	7.3%
Santa Clara	26,664	650,352	4.1%
Santa Cruz	5,982	96,487	6.2%
Ventura	16,539	275,653	6.0%

Source: U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates

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0 25 50 100  
Miles

Poverty rate by percentage



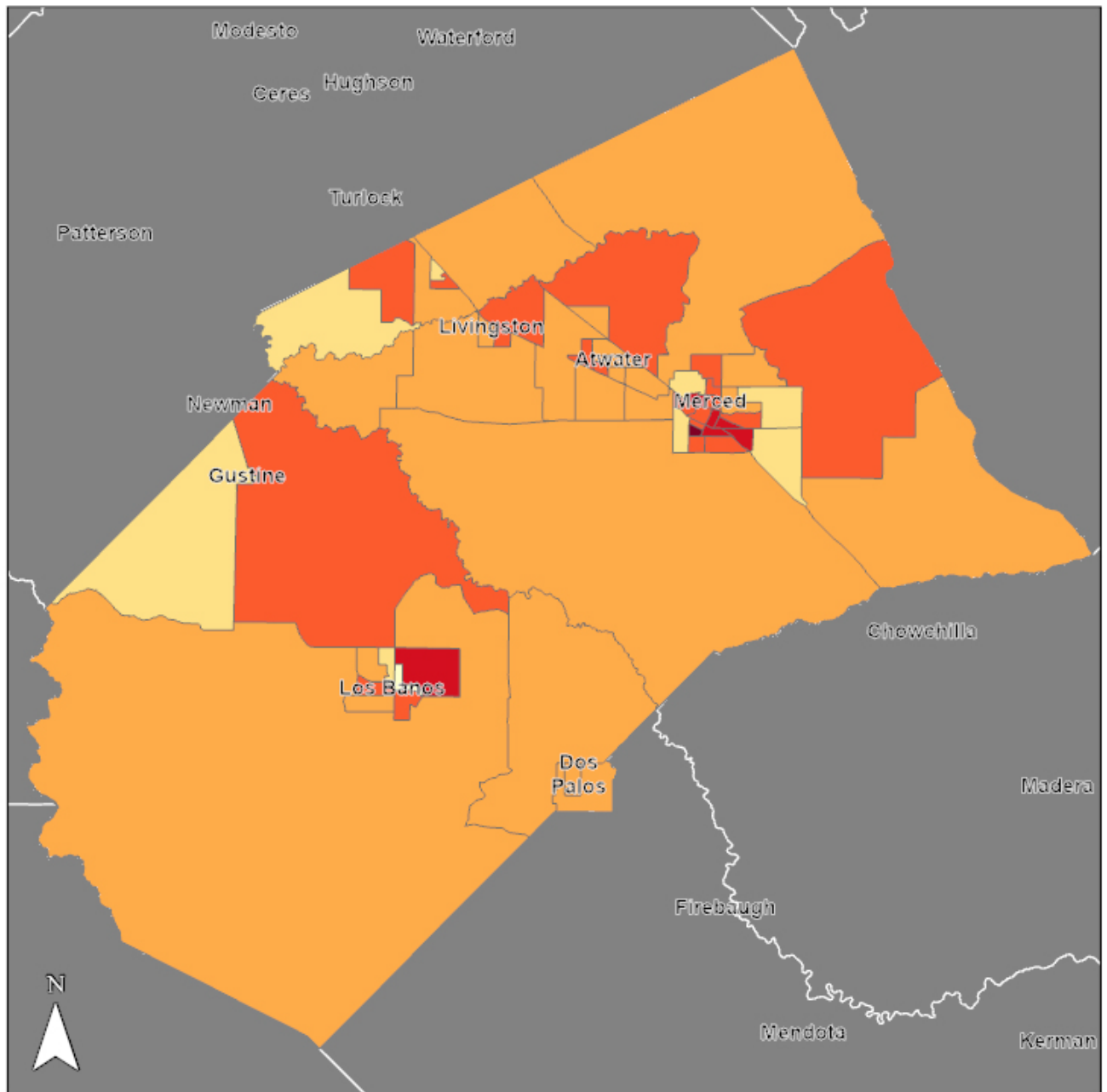
Percentage of persons by poverty estimate (2022)

DR-4683 counties by census tract

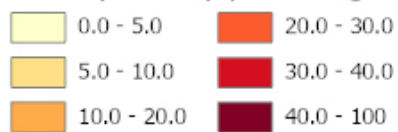


Data Source: 2018-2022 ACS 5-Year Estimates

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Poverty rate by percentage



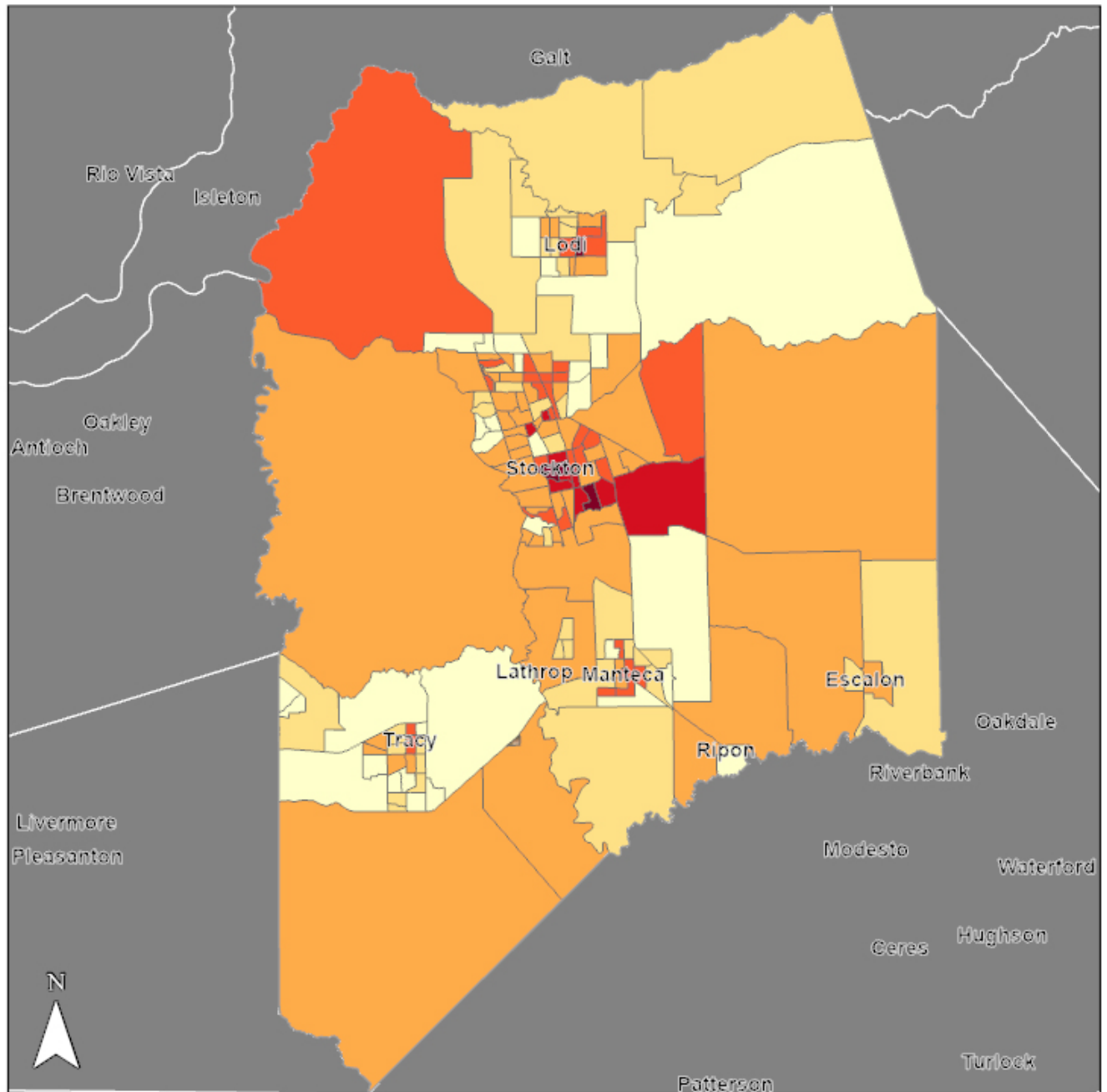
Percentage of persons below by poverty estimate (2022)

Merced County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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Poverty rate by percentage

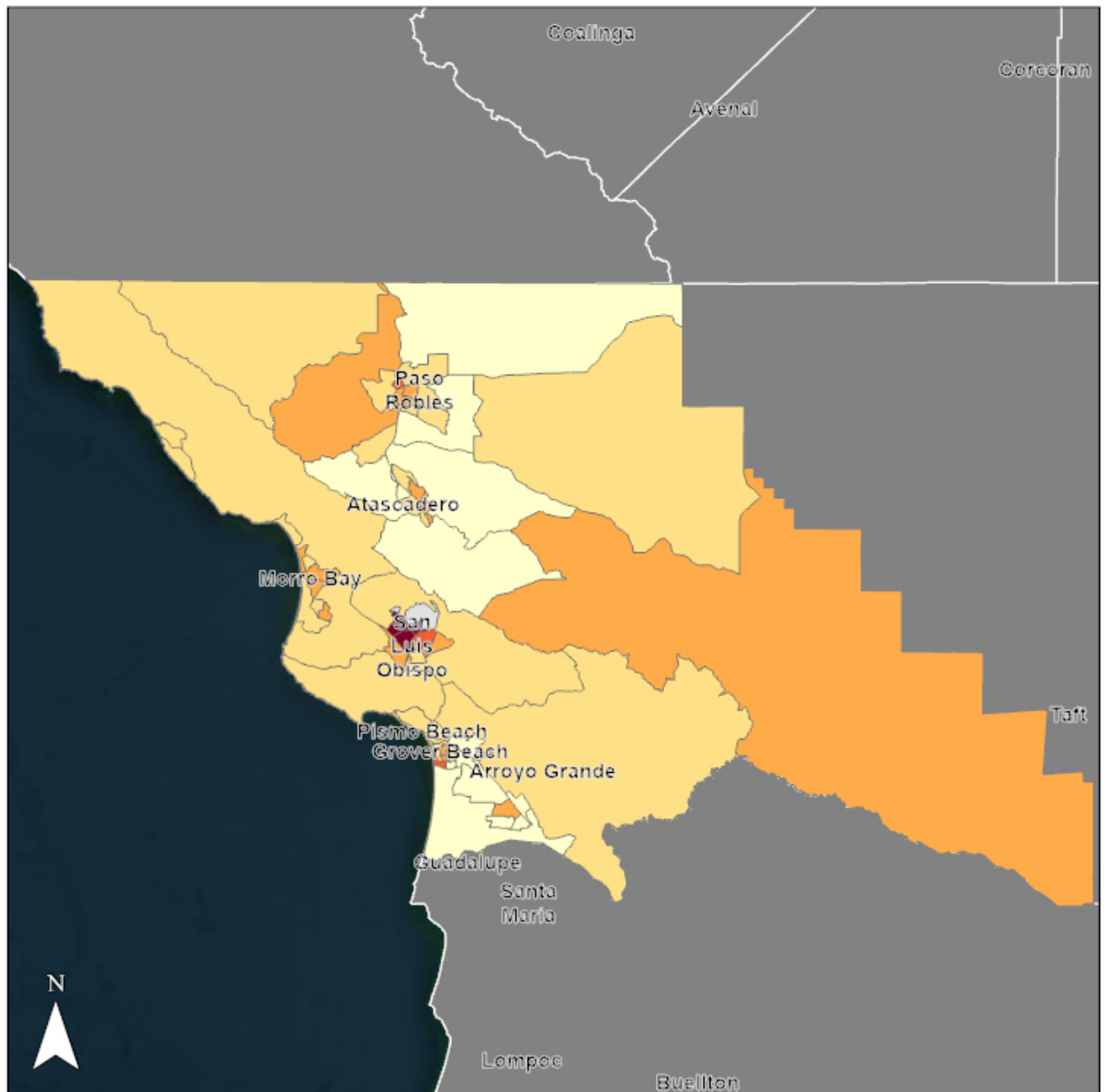
0.0 - 5.0	20.0 - 30.0
5.0 - 10.0	30.0 - 40.0
10.0 - 20.0	40.0 - 100

Percentage of persons below by poverty estimate (2022)  
San Joaquin County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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Poverty rate by percentage



Percentage of persons below by poverty estimate (2022)

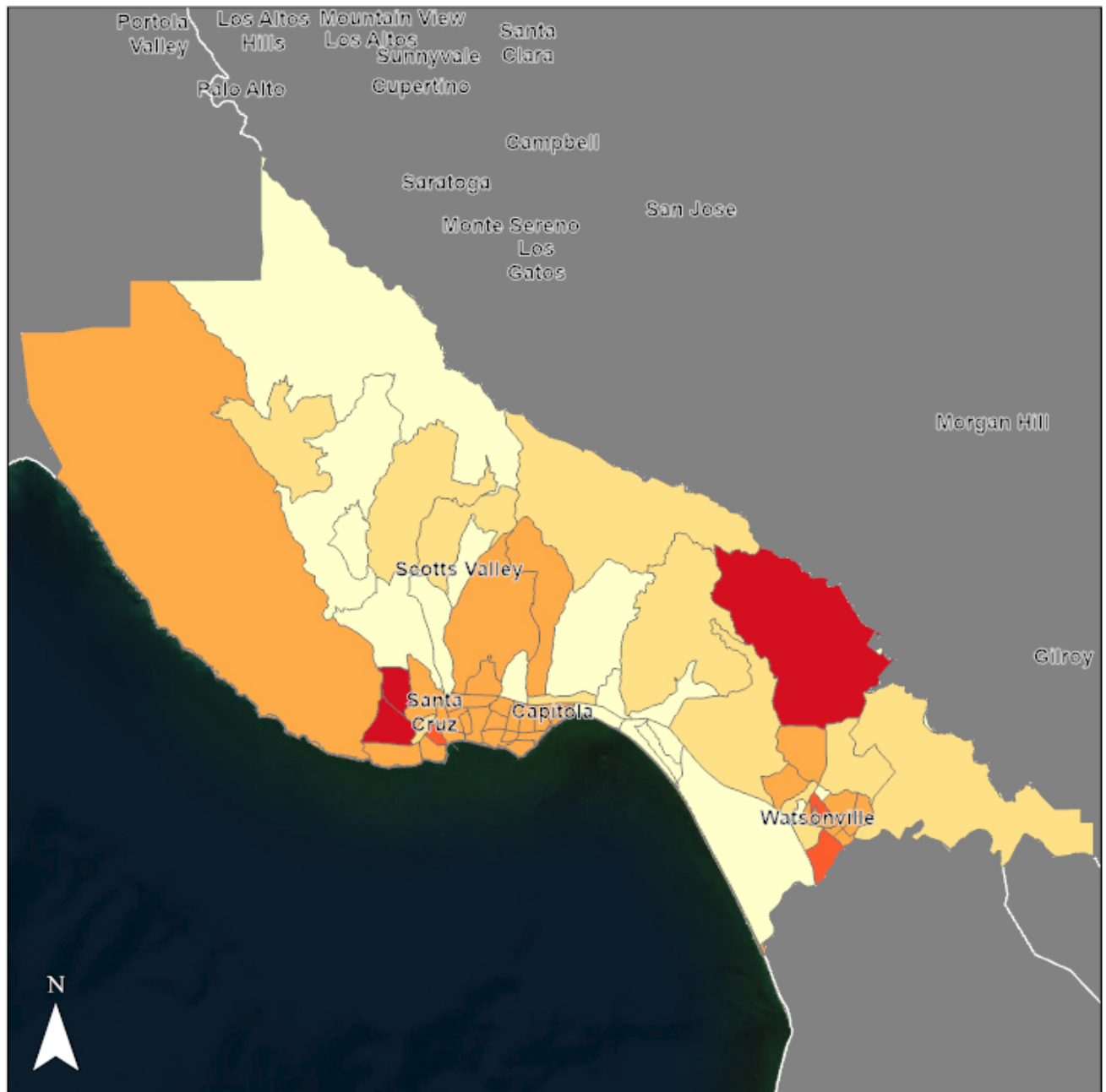
San Luis Obispo County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates



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0 2.5 5 10  
Miles

Poverty rate by percentage

0.0 - 5.0	20.0 - 30.0
5.0 - 10.0	30.0 - 40.0
10.0 - 20.0	40.0 - 100

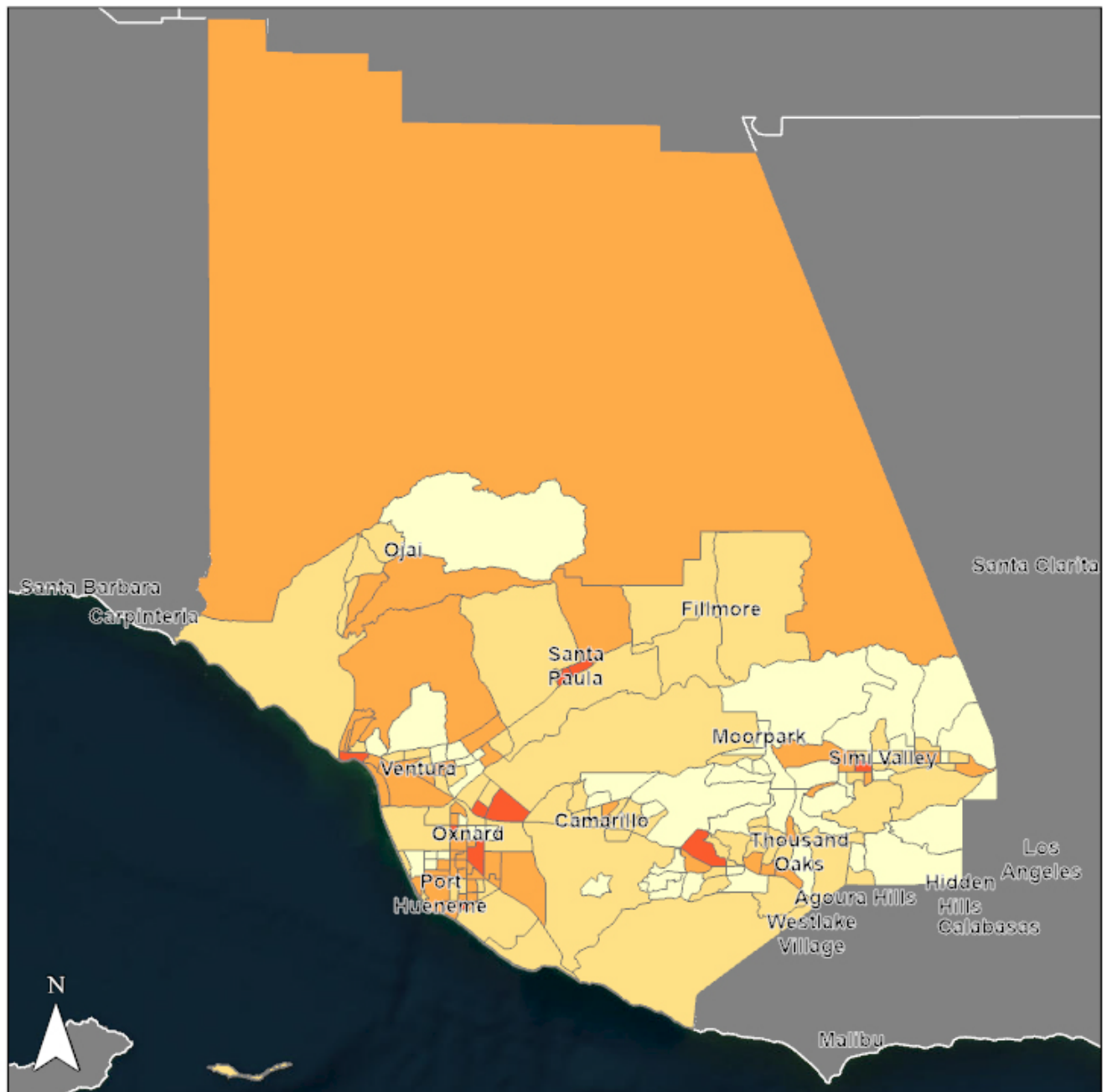
Percentage of persons below by poverty estimate (2022)

Santa Cruz County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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Poverty rate by percentage



Percentage of persons below by poverty estimate (2022)  
 Ventura County by census tract



Data Source: 2018-2022 ACS 5-Year Estimates

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## **Demographic Profile of Impacted Counties**

The counties impacted by DR-4683 represent a diverse range of demographics. The geographic spread of the disasters across the State of California results in a wide range of populations, geographies, housing inventories, resources, and challenges. The counties themselves represent a large range of populations – from low population density, rural counties to high density and urban counties.

The counties also exhibit differing needs regarding populations and access to resources. There is a considerable disparity between the lowest median household income counties (Mendocino at \$61,335) to the highest median household income counties (Santa Clara at \$153,792) and a similarly large difference for housing values and gross rent. The following section shows that many of the impacted counties rank among the top 80 percentile of vulnerability in the United States (Alameda, Merced, Monterey, Santa Barbara and Santa Cruz), while others fall into the lowest quartile of vulnerability in the country (Calaveras, Contra Costa, and Ventura).

Even the wealthiest, most well-resourced counties have pockets of vulnerability. For instance, San Mateo has the lowest poverty rate but still has 3.9 percent of the total population living in poverty. Every county also has a significant portion of people who may have additional challenges or needs in disaster and disaster recovery, including homeless populations, people over age 65, and people living with disabilities.

## **Impacts on Low- and Moderate-Income (LMI) Populations**

Proposed disaster recovery and mitigation activities must prioritize the protection of low- and moderate-income (LMI) persons and meet the overall LMI benefit national objective. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent of the total allocation must be expended to benefit populations 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. Merced county contains LMI populations accounting for more than 51 percent of the total county populations. While the rest of the counties are not considered LMI designated counties, they do have significant LMI populations that make up at least 38 percent of the total population.

## **HUD Income Limits**

Proposed disaster recovery and mitigation programs and projects must prioritize the protection of low- and moderate-income (LMI) persons and meet the overall LMI benefit national objective. Seventy percent of CDBG-DR funds must be spent to benefit LMI persons and 80 percent must be expended to benefit 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.<sup>19</sup> Statewide median income as of 2021 in California is

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<sup>19</sup> HUD. "Income Limits", May 15, 2023, [https://www.huduser.gov/portal/datasets/il.html#2021\\_query](https://www.huduser.gov/portal/datasets/il.html#2021_query)

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\$90,100; a household of four is considered LMI if earning a gross income of \$64,850 or less<sup>20</sup>

**STATEWIDE INCOME LIMITS**

<b>Household Size</b>	<b>1 person</b>	<b>2 persons</b>	<b>3 persons</b>	<b>4 persons</b>	<b>5 persons</b>	<b>6 persons</b>	<b>7 persons</b>	<b>8 persons</b>
Extremely Low Income (30%)	\$22,400	\$25,600	\$28,800	\$32,000	\$34,600	\$37,150	\$39,700	\$42,250
Low Income (50%)	\$37,350	\$42,700	\$48,000	\$53,350	\$57,650	\$61,900	\$66,150	\$70,450
Low Income (80%)	\$59,750	\$68,300	\$76,850	\$85,400	\$92,250	\$99,050	\$105,900	\$112,750

<sup>20</sup> HCD. "2023 State Income Limits", June 6, 2023, <https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf>

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The following figures provide a breakdown of the state's 2023 income limits by counties impacted by DR-4683.

**INCOME LIMITS FOR EXTREMELY LOW-INCOME DR-4683**

<b>County</b>	<b>1 person</b>	<b>2 persons</b>	<b>3 persons</b>	<b>4 persons</b>	<b>5 persons</b>	<b>6 persons</b>	<b>7 persons</b>	<b>8 persons</b>
Alameda	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
Amador	19,250	22,000	24,860	30,000	35,140	40,280	45,420	50,560
Calaveras	20,050	22,900	25,750	30,000	35,140	40,280	45,420	50,560
Contra Costa	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
Mendocino	17,850	20,400	24,860	30,000	35,140	40,280	45,420	50,560
Merced	17,350	19,800	24,860	30,000	35,140	40,280	45,420	50,560
Monterey	25,300	28,900	32,500	36,100	39,000	41,900	45,420	50,560
Sacramento	22,550	25,750	28,950	32,150	35,140	40,280	45,420	50,560
San Joaquin	18,450	21,050	24,860	30,000	35,140	40,280	45,420	50,560
San Luis Obispo	24,350	27,800	31,300	34,750	37,550	40,350	45,420	50,560
San Mateo	39,050	44,600	50,200	55,750	60,250	64,700	69,150	73,600
Santa Barbara	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
Santa Clara	37,450	42,800	48,150	53,500	57,800	62,100	66,350	70,650
Santa Cruz	34,600	39,550	44,500	49,400	53,400	57,350	61,300	65,250
Ventura	27,900	31,900	35,900	39,850	43,050	46,250	49,450	52,650

Source: 2023 HUD Income Limits

## People with Disabilities

People with disabilities are disproportionately impacted by disasters, as disruptions in support systems and medical care exacerbate challenges people reckon with as part of regular life. Due to impaired or limited physical or cognitive abilities, individuals may be unable to evacuate safely or easily, create or maintain a preparedness plan, advocate fully for their needs, or seek out necessary care while displaced. After disasters, people with disabilities face significant barriers in finding and securing appropriate housing, transportation, employment, physical and mental health services, and other supports critical to long-term recovery.

The American Community Survey measures six disability types:

- Hearing Difficulty, deaf or having serious difficulty hearing.
- Vision Difficulty, blind or having serious difficulty seeing, even when wearing glasses.

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- 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.<sup>21</sup>

Within the DR-4683, Calaveras, Amador, and Mendocino counties have the highest percent population with a disability, each with a population of more than 18 percent.

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

**Percent of Population with Disability by County for DR-4683**

Percent of Population with Disability by County	Total Population (non-institutionalized)	Total with Disability of All Types (non-institutionalized)	Percent	MID
California	38,874,540	4,275,158	11%	
Alameda	1,654,106	157,897	10%	
Amador	37,591	6,812	18%	
Calaveras	45,341	9,660	21%	
Contra Costa	1,157,711	130,100	11%	
Mendocino	90,359	16,931	19%	
Merced	279,730	35,696	13%	X
Monterey	422,849	38,882	9%	
Sacramento	1,565,603	192,518	12%	
San Joaquin	769,518	93,701	12%	X
San Luis Obispo	276,398	36,013	13%	X
San Mateo	750,550	65,466	9%	
Santa Barbara	437,957	47,547	11%	
Santa Clara	1,906,731	163,504	9%	
Santa Cruz	267,448	31,335	12%	X
Ventura	834,383	94,179	11%	X

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S1810  
DISABILITY CHARACTERISTICS

<sup>21</sup> U.S. Census Bureau, "How Disability Data are Collected from the American Community Survey," <https://www.census.gov/topics/health/disability/guidance/data-collection-acrs.html>

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## Population 65 and Older

Senior households face special challenges and are disproportionately affected by disasters. Challenges for seniors may include owner-occupied households non-existent or inadequate insurance (due to a lack of resources, or because the mortgage has been paid off), individuals unable to access medication or care when medical systems are disrupted, or mobility or cognitive impairments that hinder safe evacuations, issues while may limit ability to evacuate. Data shows the percentage of population over 65 in disaster impacted counties. Amador, Calaveras, Mendocino and San Luis Obispo counties each have elderly populations that make up more than 20 percent of the county population.<sup>22</sup>

**Percent of Population over 65 by County in DR-4683**

Percent of Population over 65 by County	Total Population	Population Aged 65 Years or Older	Percent	MID
California	39,356,104	5,865,300	15%	
Alameda	1,663,823	243,239	15%	
Amador	40,577	10,925	27%	
Calaveras	45,674	13,155	29%	
Contra Costa	1,162,648	190,307	16%	
Mendocino	91,145	21,197	23%	
Merced	282,290	32,222	11%	X
Monterey	437,609	62,381	14%	
Sacramento	1,579,211	230,399	15%	
San Joaquin	779,445	101,414	13%	X
San Luis Obispo	281,712	59,439	21%	X
San Mateo	754,250	127,520	17%	
Santa Barbara	445,213	70,948	16%	
Santa Clara	1,916,831	269,943	14%	
Santa Cruz	268,571	47,668	18%	X
Ventura	842,009	137,596	16%	X

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S0103  
POPULATION 65 YEARS AND OLDER

## Housing Impact Cost Burdened Households

HUD describes households that spend more than 30 percent of their gross monthly income on housing costs as “cost burdened.” Cost-burdened households usually experience greater struggles with other living costs like healthcare, food, transportation, and childcare, and often lack adequate savings to spend on evacuation, shelter, or

<sup>22</sup> U.S. Census Bureau, 2016-2020 American Community Survey, 5-Year Estimates, <https://www.census.gov/newsroom/press-kits/2021/acs-5-year.html>



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recovery from disaster scenarios.<sup>23</sup> Due to financial insecurity, these households are often less able to recover or bounce back quickly after a disaster. Every disaster impacted county population is on average 47 percent cost burdened.

### **Persons Experiencing Homelessness**

Persons experiencing homelessness are especially susceptible during disasters and require additional support during disaster recovery. Lack of permanent addresses or limited digital communications access can make locating and evacuating unhoused people very difficult, and the trauma of a major disaster can amplify any existing physical or mental health challenges. For people already struggling with housing and resource instability, a disaster and subsequent displacement can be disproportionately destructive.

The tables below illustrate a one-night count of unhoused people in each county. These counts measured the number of sheltered and unsheltered persons experiencing homelessness in each of the continuum of care regions, some of which are shared by multiple counties. Some of the counties share the same continuum of care regions and resources. Results of the one-night count ranged from 368 persons (Merced City and County CoC) to 7,708 persons (San Jose/Santa Clara City and County CoC). Additional data from the same point-in time count reveals that the majority individuals seeking shelter after disasters in impacted CoCs come from unhoused populations.<sup>24</sup>

Addressing homelessness is an ongoing challenge for communities across California, but the state commits significant state resources for local governments including areas impacted by the 2023 disasters. The Governor's 2024-25 budget proposes \$3.4 billion for nearly 30 homelessness related programs across state departments.<sup>25</sup> This includes previously budgeted amounts of \$400 million for a third round of encampment resolution grants and \$1 billion for a fifth round of Homeless Housing, Assistance, and Prevention (HHAP) grants. HCD is a key agency in implementing these programs from federally funded programs to newer programs like Project Homekey.<sup>26</sup>

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<sup>23</sup> HCD. "Housing and Transportation", n.d, <https://www.hcd.ca.gov/policy-and-research/intersectional-policy-work/housing-and-transportation>

<sup>24</sup> HUD. "CoC Homeless Populations and Subpopulations Reports", 2023, <https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

<sup>25</sup> State of California. "2024-25 State Budget Proposal Protects Core Priorities and Ensures Fiscal Stability", January 10, 2023, <https://www.gov.ca.gov/2024/01/10/2024-25-state-budget-proposal-protects-core-priorities-and-ensures-fiscal-stability/>

<sup>26</sup> HCD. "Bringing California Home", January 17, 2024, <https://www.hcd.ca.gov/grants-and-funding/homekey>



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**Emergency Solutions Grant Program** – Grants to address homelessness by providing funding for supportive services, emergency shelter/transitional housing, homelessness prevention assistance, and permanent housing.

**HOME American Rescue Plan** – Assists individuals or households at risk of, or experiencing homelessness, and other susceptible populations, by providing housing, rental assistance, supportive services, and non-congregate shelter.

**Housing for a Healthy California** – Funds the creation and support of new and existing permanent supportive housing for people who are experiencing chronic homelessness or are homeless and high-cost health users.

**Housing Navigators Program** – Provides funds to counties for the support of housing navigators to help young adults aged 18 to 21 years secure and maintain housing, with priority given to young adults in the foster care system.

**Multifamily Housing Program** – State program providing low-interest, long-term deferred-payment loans for new construction, rehabilitation, and preservation of permanent rental housing for lower-income households.

**No Place Like Home** – Funds the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or at risk of chronic homelessness.

**Permanent Local Housing Allocation (PLHA)** – Grant funding available to eligible local governments in California for housing-related projects and programs that assist in addressing the unmet housing needs of their local communities.

**Pet Assistance and Support (PAS) Program** – Grant funds to homeless shelters for pet shelters, food and basic veterinary services for pets owned by individuals experiencing homelessness.

**Transitional Housing Program** – Funds to help young adults 18-24 years secure and maintain housing, with priority given to those formerly in the foster care or probation systems.

**Veterans Housing and Homelessness Prevention Program** – Long-term loans for development or preservation of rental housing for very low- and low-income veterans and their families.

While shelter, addressing homelessness, supportive housing, and other efforts remain needs for areas impacted by the 2023 disasters, HCD proposes to utilize its proposed Multifamily to create long-term housing solutions to add units for low-income individuals in disaster impacted areas. The Outreach and Engagement section of this document provides additional details on consultations with renters and homeowners displaced by the 2023 disasters.

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#### **Mobile Housing Units**

Mobilehomes are more susceptible to disasters than permanent residential structures due to structural deficiencies and an increased likelihood of being in exposed, higher-risk areas. A recent case study of mobile home parks in flood-affected communities found that mobilehome parks faced unique disaster vulnerabilities due to a high concentration socioeconomic instability, stigmatization by local government and community, and exclusion or disenfranchisement during post disaster recovery due to that stigmatization.<sup>27</sup>

Mobilehomes account for over 6 percent or more of the total housing stock in Mendocino, Merced, and Santa Cruz counties and reflect a substantial portion of homes damaged by the 2023 Winter storms. Mobilehomes represent a significant portion of the non-deed restricted affordable housing stock in all DR-4683 identified MID counties.

#### **Displacement of Persons and Other Entities**

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, HCD will coordinate with Governor's Office of Emergency Services (Cal OES) and other State Agencies to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

HCD develops all programs with the intent to minimize displacement of persons or entities, following its existing Residential Anti-displacement and Relocation Assistance Plan (RARAP) in accordance with 24 CFR part 42.325. All program policies and procedures, applications, and technical assistance provided will include policies around displacement. HCD will amend the existing RARAP to reflect the requirements and applicable waivers and requirements as modified by the Consolidated Notice, 87 FR 6381, prior to implementing any activity with 2023 CDBG-DR grants funds.

HCD will minimize displacement of persons or entities as a result of the implementation of CDBG-DR projects by ensuring that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24) and part 104(d) of the Housing and Community Development Act of 1974 and the implementing regulations at 24 CFR part 570.496(a). All recovery programs outlined in this Action Plan will be implemented with the goal of minimizing displacement of individuals and families from their home, whether rental or owned, and/or their neighborhoods.

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<sup>27</sup>Andrew Rumbach, Esther Sullivan, and Carrie Makarewicz, "Mobile Home Parks and Disasters: Understanding Risk to the Third Housing Type in the United States: Natural Hazards Review: Vol 21, No 2," Natural Hazards Review (American Society of Civil Engineers, January 21, 2020), <https://par.nsf.gov/servlets/purl/10318308>

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HCD understands the individualized nature of disaster recovery and the complexities of the recovery process, as well the necessity to join in that process to provide support and guidance through that process.

#### **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.

The California Department of Water Resources (DWR) Statewide Flood Management Planning (SFMP) program works with organizations across the State to develop flood management policies and guide financial investments to protect people and property from flooding.

In partnership with the U.S. Army Corps of Engineers, DWR developed California's Flood Future: [Recommendations for Managing the State's Flood Risk](#), a comprehensive look at flooding throughout the state.

#### *Elevation standards.*

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest floor, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

The structures will be elevated to 2 feet above Base Flood Elevation (BFE) or higher if required by locally adopted regulations known as Design Flood Elevation (DFE) to meet the required Federal Flood Risk Management Standard (FFRMS).

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 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 market value of the property is considered substantially damaged and will require the entire home to be brought into building code compliance, including compliance with the current local floodplain regulations.

Elevated structures will meet federal accessibility design and construction standards to accommodate persons with a disability under the Fair Housing Act, Section 504, the ADA, and 24 CFR 8.22.

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**Social and Public Service Programs**

Disasters exacerbate preexisting conditions in communities and disproportionately affect susceptible populations. Deaths, injuries, and the loss of property or possessions due to disasters can magnify ongoing health and mental health issues and create additional challenges in a household and community's recovery process. Social service programs work to address these challenges by identifying susceptible communities, providing financial and logistical support, and promoting physical and mental wellness in communities throughout California. Social service professionals act as advocates and service providers to underserved populations, and connect survivors with critical supplies and services before, during, and after a disaster. Social services directly mitigate the impacts of disasters on susceptible populations, and help communities recover stronger and faster. The following programs provide these services to impacted communities across California, from the local to state level:

**Case Management**

Disaster Case Management is provided by local Disaster Case Manager Partners (DCMP) agencies throughout the state in the disaster impacted counties. In more rural areas, multiple counties may be served by the same organization. For instance, Catholic Charities Diocese of Fresno as of January 2023 was currently serving survivors of the 2023 flooding in Kern, Merced, Madera, Mariposa, and Tulare counties. In previous disasters, the State was told what a significant effort it is to get people's homes and lives back together and that both the counties and the cities desperately need help building capacity.

Catholic Charities of California, an organization that coordinates the Disaster Case Management Program, provided the following table of case management activities and metrics through December 31, 2023.

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**CASE MANAGEMENT CASELOADS AND CLOSURES**

<b>Metric</b>	<b>DR-4683</b>	<b>Unassigned</b>
Survivors Served (all dates)	882	Unknown
Survivors Served (open last day)	590	Unknown
Caseload (last day)	249	Unknown
Waitlist (last day)	353	Unknown
Referrals		Unknown
Number of Referrals Made	1,301	Unknown
Value	\$225,326.10	Unknown
Closures		Unknown
Total Survivors Closed	280	Unknown

Source: Catholic Charities of California - All Data Through 12/31/2023

The tables below regarding vulnerabilities of case management clients shows that DR-4683 saw many cases in which people had urgent basic needs, were uninsured/underinsured, or dealing with housing insecurity, poverty, or unemployment. Disaster DR-4683 also had many clients who spoke limited English or experience limited literacy (nine percent).

**DR-4683 CASE MANAGEMENT -SUSCEPTIBILITY**

<b>-Susceptibility</b>	<b>DR-4683 Number</b>	<b>DR-4683 Percent</b>
Urgent Basic Needs	341	40%
Immediate Medical Needs	27	3%
Safety Risk	93	11%
Housing Insecurity	175	20%
Poverty	171	20%
Unemployment	221	26%
Elderly (65+)	100	12%
Minor Child (w/o adult)	11	1%
Single Head of Household	54	6%
Disabled	98	11%
Uninsured/Underinsured	126	15%
Isolated	24	3%
Emotional Distress	111	13%
Limited Literacy	74	9%
Limited English	73	9%
Limited Transportation	12	1%
Limited Info. Access	7	1%
Functional Needs (AFN)	24	3%

Source: DCMP December 2023. Catholic Charities

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**Grantee Demographics and Disaster Impacted Populations**

Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	39,356,104.00	100%	10,591,008.00	28.04%	2,454,027.00	6.23%
Under 5 years	2,258,308.00	5.70%	600,395.00	5.66%	143,103.00	5.83%
65 years and over	5,865,300.00	14.09%	1,618,353.00	15.28%	378,339.00	15.41%
Population with a Disability	4,275,158.00	11.00%	1,120,241.00	10.57%	290,924.00	11.85%
White or Caucasian	18,943,660.00	48.10%	4,880,057.00	46.07%	1,382,896.00	56.35%
Black or African American	2,202,587.00	5.60%	590,389.00	5.57%	84,488.00	3.44%
American Indian and Alaska Native	394,188.00	1.00%	94,423.00	0.89%	13,136.00	0.53%
Asian	5,949,136.00	15.10%	2,288,361.00	21.60%	239,237.00	9.74%
Native Hawaiian and Other Pacific Islander	150,531.00	0.40%	64,057.00	0.60%	8,360.00	0.34%
Other	6,388,999.00	16.20%	1,352,362.00	12.76%	336,821.00	13.72%

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates  
Demographics Characteristics, U.S. Bureau, 2015-2019 American Community Survey

**Income Demographics**

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Median Household Income	\$91,905.00	\$91,474.00	\$90,158.00
Per Capita Income	\$45,591.00	\$47,370.00	\$41,372.00

Source(s): Data Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S1901 INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)

**Income Demographics - Low Income**

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	8.50	7.80	8.78

Source(s): U.S. Census Bureau, 2018-2022 American Community Survey, 5-Year Estimates S1901 INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)

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**LMI Analysis - Overall**

<b>Category</b>	<b>Total LMI Persons</b>	<b>Total Population</b>	<b>Percent LMI</b>
Area wide	18,023,159.00	37,604,155.00	47.69%

Source(s): HUD FY 2021 (2011-2015 ACS)

**LMI Analysis - Federally Declared Disaster Areas**

<b>County/Municipality</b>	<b>Non-MID Total LMI Persons</b>	<b>Non-MID Total Population</b>	<b>Non- MID Percent age LMI</b>	<b>MID Total LMI Person</b>	<b>MID Total Population</b>	<b>MID Percent age LMI</b>
Non-MID Counties: Alameda, Amador, Calaveras, Contra Costa, Mendocino, Monterey, Sacramento, San Mateo, Santa Barbara, Santa Clara, MID Counties: Merced, San Joaquin, San Luis Obispo, Santa Cruz, Ventura	3,350,799	7,663,625	43.72%	1,017,295	2,298,105	44.27%

Source(s): HUD FY 2021 (2011-2015 ACS)

**Manufactured Housing Units Impacted by Disaster**

<b>County/Municipality</b>	<b>Number of Units</b>	<b>% of Total Units in County/Municipality</b>	<b>Remaining Unmet Need</b>
Santa Cruz	71.00	8.00%	\$13,950,000.00
Merced	176.00	19.00%	\$34,350,000.00
San Joaquin	236.00	25.00%	\$45,812,500.00
San Luis Obispo	328.00	38.00%	\$68,475,000.00
Ventura	94.00	10.00%	\$17,912,500.00
<b>Total</b>	<b>905.00</b>	<b>100.00%</b>	<b>\$180,500,000.00</b>

Source(s): Disaster Case Management Data Local Government Data

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**Point-in-Time Count - Type of Shelter**

<b>Geography</b>	<b>Emergency Shelter</b>	<b>Transitional Housing</b>	<b>Unsheltered Homeless</b>	<b>Total Known Homeless</b>
Area wide	34,996.00	8,581.00	110,451.00	154,028.00
FEMA Declared	8,546.00	2,112.00	28,217.00	38,875.00
MID	1,997.00	316.00	5,296.00	7,609.00

Source(s): HUDexchange.info, 2023 CoC Homeless Populations and Subpopulations Reports:  
<https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

**Point-in-Time Count - Impacted by Disaster**

<b>Geography</b>	<b>Emergency Shelter</b>	<b>Transitional Housing</b>	<b>Unsheltered Homeless</b>	<b>Total Known Homeless</b>
Area wide	46,111.00	11,865.00	123,423.00	181,399.00
FEMA Declared	11,120.00	2,896.00	33,636.00	47,652.00
MID	2,570.00	485.00	5,960.00	9,015.00

Source(s): HUDexchange.info, 2023 CoC Homeless Populations and Subpopulations Reports:  
<https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

**Assisted Housing Impacted by the Disaster**

<b>County/Municipality</b>	<b>Total Housing Choice Vouchers</b>	<b>Total Impacted Housing Choice Voucher Units</b>	<b>Total LIHTC Units</b>	<b>Total Impacted LIHTC units</b>	<b>Total Public Housing Dwelling Units</b>	<b>Total Impacted Public Housing Dwelling Units</b>	<b>Remaining Unmet Need</b>
Merced	68	0.00	2,135	0.00	421	0.00	\$0.00
San Joaquin	232	0.00	4,240	0.00	992	0.00	\$0.00
San Luis Obispo	156	0.00	2,501	0.00	0	0.00	\$0.00
Santa Cruz	269	0.00	2,468	0.00	0	0.00	\$0.00
Ventura	63	0.00	7,077	0.00	1176	0.00	\$0.00
<b>Total</b>	<b>788</b>	<b>0</b>	<b>18,421</b>	<b>0</b>	<b>2,589</b>	<b>0</b>	<b>\$0.00</b>

Source(s): Local Government and Public Housing Authorities Data

## Infrastructure Unmet Need

### Disaster Damage and Impacts - Infrastructure

The FEMA Public Assistance (FEMA PA) program is designed to provide immediate assistance to disaster-impacted jurisdictions for emergency work (under FEMA Sections



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403 and 407) and permanent work (Sections 406 and 428) on infrastructure and community facilities. Data from these programs was used to assess the impact of the disasters on infrastructure and calculate unmet need.

Although there is a clear need for infrastructure repairs and improvements, due to the limited available funding, this Action Plan focuses on unmet recovery needs related to housing and housing related infrastructure with an emphasis on projects that meet the LMI National Objective. After extensive outreach with local governments and NGOs, no infrastructure projects were identified that would benefit LMI communities in DR-4683 MID identified counties. In addition, other flood mitigation and resiliency needs, such as levee repair work are being funded by other state resources through Department of Water Resources and through Army Corps of Engineers.

Overall, the known universe of housing and housing related infrastructure needs have clearer ties to LMI communities than the universe of infrastructure needs derived from FEMA-PA. Furthermore, the housing and housing related infrastructure needs better align with the timeline HCD has to spend these funds as compared to the universe of infrastructure needs derived from FEMA-PA.

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

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**TOTAL COST AND NEED BY PA CATEGORY**

<b>PA Category</b>	<b>Estimated PA Cost</b>	<b>Federal Resources</b>	<b>Local Match</b>	<b>Resiliency</b>	<b>Total Need (Match + Resiliency)</b>
A - Debris	\$220,979,671.50	\$167,717,869.25	\$53,261,802.25	\$7,989,270.34	\$61,251,072.59
B - Emergency Measures	\$131,620,551.36	\$103,153,777.32	\$28,466,774.04	\$4,270,016.11	\$32,736,790.15
C - Roads and Bridges	\$344,942,167.54	\$258,706,626.04	\$86,235,541.50	\$12,935,331.22	\$99,170,872.72
D - Water Control Facilities	\$257,843,929.73	\$193,382,947.51	\$64,460,982.22	\$9,669,147.33	\$74,130,129.55
E - Building and Equipment	\$87,338,483.32	\$65,503,862.85	\$21,834,620.47	\$3,275,193.07	\$25,109,813.54
F - Utilities	\$92,757,072.29	\$92,757,072.29	\$0.00	\$0.00	\$0.00
G - Other	\$275,100,409.05	\$206,361,894.29	\$68,738,514.76	\$10,310,777.21	\$79,049,291.97
<b>Total</b>	<b>\$1,410,582,284.79</b>	<b>\$1,087,584,049.55</b>	<b>\$322,998,235.24</b>	<b>\$48,449,735.28</b>	<b>\$371,447,970.52</b>

Data Source(s): FEMA December 2023

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**FEMA PA Local Share Only for DR-4683 by Category**

<b>Category</b>	<b>Projects</b>	<b>Total Damage</b>	<b>Total Resources</b>	<b>Total Unmet Need</b>
A - Debris Removal	574	\$220,979,671.50	\$167,717,869.25	\$53,261,802.25
B - Emergency Protective Measures	644	\$131,620,551.36	\$103,153,777.32	\$28,466,774.04
<b>Total</b>	<b>66</b>	<b>\$352,600,222.86</b>	<b>\$270,871,646.57</b>	<b>\$81,728,576.29</b>

Data Source(s): FEMA December 2023

**FEMA PA Local Share Only for DR-4683 by Category**

<b>Category</b>	<b>Projects</b>	<b>Total Damage</b>	<b>Total Resources</b>	<b>Total Unmet Need</b>
C - Roads and Bridges	689	\$344,942,167.54	\$258,706,626.04	\$86,235,541.50
D - Water Control Facilities	261	\$257,843,929.73	\$193,382,947.51	\$64,460,982.22
E - Buildings and Equipment	344	\$87,338,483.32	\$65,503,862.85	\$21,834,620.47
F - Utilities	207	\$92,757,072.29	\$92,757,072.29	\$0.00
G - Parks, Recreational Facilities, and Other Items	574	\$275,100,409.05	\$206,361,894.29	\$68,738,514.76
<b>Total</b>	<b>2075</b>	<b>\$1,057,982,061.93</b>	<b>\$816,712,402.98</b>	<b>\$241,269,658.95</b>

Data Source(s): FEMA December 2023

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**Total Cost and Need by PA Category**

<b>PA Category</b>	<b>Estimated PA Cost</b>	<b>Local Match</b>	<b>Resiliency</b>	<b>Total Need (Match + Resiliency)</b>
A - Debris	\$220,979,671.50	\$53,261,802.25	\$7,989,270.34	\$61,251,072.59
B - Emergency Measures	\$131,620,551.36	\$28,466,774.04	\$4,270,016.11	\$32,736,790.15
C - Roads and Bridges	\$344,942,167.54	\$86,235,541.50	\$12,935,331.22	\$99,170,872.72
D - Water Control Facilities	\$257,843,929.73	\$64,460,982.22	\$9,669,147.33	\$74,130,129.55
E - Building and Equipment	\$87,338,483.32	\$21,834,620.47	\$3,275,139.07	\$25,109,813.54
F - Utilities	\$92,757,072.29	\$0.00	\$0.00	\$0.00
G - Other	\$275,100,409.05	\$68,738,514.76	\$10,310,777.21	\$79,049,291.97
<b>Total</b>	<b>\$1,410,582,284.79</b>	<b>\$322,998,235.24</b>	<b>\$48,449,681.28</b>	<b>\$371,447,970.52</b>

Data Source(s): FEMA December 2023

Data Source(s): CalOES – Dec 2023

**HCD INFRASTRUCTURE UNMET NEEDS PER COUNTY**

<b>HCD Infrastructure Total of Unmet Needs</b>					
<b>County</b>	<b>Total Amount of All Projects</b>	<b>Total Costs HMGP, PA &amp; Stand Alone</b>	<b>All Total Federal Share</b>	<b>All Total Unmet Needs</b>	<b>Percentage of Unmet Needs</b>
Merced	73	\$67,560,544	\$41,413,284	\$26,147,260	26.06%
San Joaquin	125	\$17,541,720	\$14,407,664	\$3,134,056	3.12%
San Luis Obispo	187	\$75,176,136	\$50,090,378	\$25,085,758	25.00%
Santa Cruz	149	\$84,826,288	\$49,958,196	\$34,868,092	34.75%
Ventura	119	\$49,192,292	\$38,089,025	\$11,103,267	11.07%
<b>All Totals</b>	<b>653</b>	<b>\$294,296,980</b>	<b>\$193,958,547</b>	<b>\$100,338,433</b>	<b>100.00%</b>

Data Source(s): CalOES HMGP, FEMA PA, March 2025 plus Stand-Alone Projects

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The use of the CDBG-DR for PA/HMGP match needs are to serve LMI needs.

HCD reached out to cities and counties to collect unmet needs data, specifically any identified projects that go beyond FEMA PA and HMGP project data. HCD then added up the estimated project budgets by project type to provide these numbers. HCD also collected project information asking for projects: 1) to have either a tie-back or meet the definition of mitigation, 2) serves the MID, 3) can be completed in 5-years' time, 4) is an eligible activity type: infrastructure, mitigation-planning, or mitigation – infrastructure, 5) project name and brief description, and 6) estimated project budget that specifies the amount covered by CDBG-DR funds.

### **Economic Revitalization Unmet Need.**

#### **Disaster Damage and Impacts – Economic Revitalization.**

The SBA offers Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) to businesses to repair or replace disaster damaged property, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations such as charities, churches, and private universities are also eligible. The law limits these business loans to \$2 million, and the amount cannot exceed the verified uninsured disaster loss. In total for Business and EIDL approved applications in 2023 disaster impacted areas, applicants requested over \$123 million in support, while only \$15.8 million has been dispersed to date. This leaves \$107.8 million in unmet needs for businesses in impacted areas.

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SBA Verified Loss by HUD Categories, MID Counties DR-4683

<b>SBA Verified Loss by HUD Categories MID County DR-4683</b>				
<b>County</b>	<b>Sum of Total Real Estate and Content Verified Loss</b>	<b>Sum of Physical Amount Disbursed</b>	<b>Unmet Need</b>	<b>Unmet Need Percentage</b>
Merced	\$7,769,720.00	\$3,132,300.00	\$4,637,420.00	12.52%
San Joaquin	\$8,510,599.17	\$5,509,900.00	\$3,000,699.17	8.10%
San Luis Obispo	\$21,585,310.66	\$9,715,600.00	\$11,869,710.66	32.05%
Santa Cruz	\$29,342,002.52	\$15,334,482.00	\$14,007,520.52	37.83%
Ventura	\$6,996,747.26	\$3,480,600.00	\$3,516,147.26	9.50%
<b>Total</b>	<b>\$74,204,379.61</b>	<b>\$37,172,882.00</b>	<b>\$37,031,497.61</b>	<b>100.00%</b>
Source: Small Business Administration, March 2025				

Source: Small Business Administration, March 2025

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**TOTAL SBA BUSINESS LOANS APPROVED**

<b>County</b>	<b>Sum of Total Verified Loss</b>	<b>Sum of Total Amount Disbursed</b>	<b>Unmet Need</b>
Alameda	\$11,446,236.83	\$1,025,700.00	\$10,420,536.83
Amador	\$1,082,181.78	\$56,800.00	\$1,025,381.78
Calaveras	\$967,478.48	\$143,500.00	\$823,978.48
Contra Costa	\$2,152,863.63	\$213,400.00	\$1,939,463.63
Mendocino	\$551,647.06	\$115,100.00	\$436,547.06
Merced	\$24,527,488.30	\$1,186,000.00	\$23,341,488.30
Monterey	\$1,185,491.10	\$226,100.00	\$959,391.10
Sacramento	\$73,784.31	\$6,547.33	\$67,236.98
San Joaquin	\$8,006,657.86	\$2,528,300.00	\$5,478,357.86
San Luis Obispo	\$12,464,122.57	\$4,030,500.00	\$8,433,622.57
San Mateo	\$5,762,554.44	\$658,500.00	\$5,104,054.44
Santa Barbara	\$26,676,849.34	\$1,464,000.00	\$25,212,849.34
Santa Clara	\$3,736,590.00	\$0.00	\$3,736,590.00
Santa Cruz	\$12,526,465.87	\$2,866,000.00	\$9,660,465.87
Ventura	\$12,484,454.30	\$1,285,800.00	\$11,198,654.30
<b>Total</b>	<b>\$123,644,865.87</b>	<b>\$15,806,247.33</b>	<b>\$107,838,618.54</b>

Source: Small Business Administration, December 2023

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**SBA APPLICANT BREAKDOWN, EIDL AND BUSINESS LOANS – DR-4683**

<b>County</b>	<b>Approved</b>	<b>Auto Decline - Credit</b>	<b>Declined</b>	<b>Duplicate</b>	<b>Withdrawn</b>	<b>Grand Total</b>
Alameda	17	6	22	1	25	71
Amador	3	1	11	0	7	22
Calaveras	4	1	8	1	5	19
Contra Costa	8	2	18	1	12	41
Mendocino	3	2	5	0	7	17
Merced	18	16	42	0	56	132
Monterey	8	3	16	2	13	42
Sacramento	21	18	51	7	47	144
San Joaquin	22	11	37	1	39	110
San Luis Obispo	53	6	57	4	83	203
San Mateo	17	6	18	2	31	74
Santa Barbara	36	5	67	4	29	141
Santa Clara	6	0	0	0	1	7
Santa Cruz	40	14	67	11	68	200
Ventura	13	7	16	1	29	66
<b>Grand Total</b>	<b>269</b>	<b>98</b>	<b>435</b>	<b>35</b>	<b>452</b>	<b>1289</b>

Source: Small Business Administration, December 2023



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**SBA ECONOMIC INJURY DISASTER LOAN, DR-4683**

<b>County</b>	<b>Total SBA EIDL Applications</b>	<b>Total Approved EIDL Applications</b>	<b>Total of EIDL Disbursed</b>
Alameda	38	4	\$248,900.00
Amador	7	2	\$273,600.00
Calaveras	9	0	\$0
Contra Costa	40	5	\$570,400.00
Mendocino	9	3	\$142,400.00
Merced	23	6	\$130,300.00
Monterey	53	10	\$2,077,900.00
Sacramento	65	10	\$866,700.00
San Joaquin	48	9	\$1,083,700.00
San Luis Obispo	50	5	\$926,600.00
San Mateo	29	3	\$603,500.00
Santa Barbara	45	9	\$485,800.00
Santa Clara	52	8	\$365,800.00
Santa Cruz	86	12	\$400,500.00
Ventura	32	8	\$1,324,800.00
<b>Total</b>	<b>586</b>	<b>94</b>	<b>\$9,500,900.00</b>

Source: Small Business Administration, December 2023

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**EIDL AND BUSINESS LOANS - DR-4683**

County	Approved	Total Loans	Total Verified Loss	Total Distributed
Alameda	17	\$1,217,000.00	\$11,446,236.83	\$1,025,700.00
Amador	3	\$56,800.00	\$1,082,181.78	\$56,800.00
Calaveras	4	\$231,600.00	\$967,478.48	\$143,500.00
Contra Costa	8	\$501,400.00	\$2,152,863.63	\$213,400.00
Mendocino	3	\$131,700.00	\$551,647.06	\$115,100.00
Merced	18	\$3,516,700.00	\$24,527,488.30	\$1,186,000.00
Monterey	8	\$502,900.00	\$1,185,491.10	\$226,100.00
Sacramento	21	\$3,180,400.00	\$11,067,646.97	\$982,100.00
San Joaquin	22	\$2,848,600.00	\$8,006,657.86	\$2,528,300.00
San Luis Obispo	53	\$6,195,800.00	\$12,464,122.57	\$4,030,500.00
San Mateo	17	\$2,966,100.00	\$5,762,554.44	\$658,500.00
Santa Barbara	36	\$33,773,800.00	\$26,676,849.34	\$1,464,000.00
Santa Clara	6	\$3,730,800.00	\$3,736,590.00	\$0.00
Santa Cruz	40	\$4,748,100.00	\$12,526,465.87	\$2,866,000.00
Ventura	13	\$2,348,400.00	\$12,484,454.30	\$1,285,800.00
Total	269	\$65,950,100.00	\$134,638,728.53	\$16,781,800.00

Source: Small Business Administration, December 2023

**d. Mitigation Only Activities**

The geographic breadth, unprecedented severity, and variety of communities impacted by the 2023 Winter Storms creates unique challenges to recovery, as well as opportunities to integrate mitigation activities critical to the state's resilience to future disasters.

The Federal Register Notice [88 FR 82982](#) and [90 FR 21328](#) sets forth new requirements that grantees use 15 percent of their total allocation to fund mitigation activities and requires that grantees include a mitigation needs assessment in the Action Plan that clearly illustrates the connections between impacts of current and future hazards, mitigation needs, and proposed mitigation activities. To address this challenge, this Action Plan includes:

- A Mitigation Needs Assessment in this plan in addition to a disaster recovery-focused unmet needs assessment.
- Proposed mitigation activities that clearly tie back to the 2023 disasters and the Mitigation Needs Assessment.
- Proposed eligible activities that do not have a tie-back but are tied to the Mitigation Needs Assessment and meet the HUD definition of mitigation.
- Descriptions of how mitigation measures have been incorporated into recovery-related construction projects.

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

HCD conducted the following risk-based assessment of current and future hazards to inform the use of the CDBG-DR mitigation set-aside. Ensuring continuous operation of indispensable services, which include critical business and government functions, services critical to health and human safety, and economic security for all community members, is vital to assessing and planning for disaster mitigation needs.

### **Mitigation Funding Background**

On November 27, 2023, the U.S. Department of Housing and Urban Development (HUD) allocated over \$142 million in Community Development Block Grant Disaster Recovery (CDBG–DR) funds appropriated by the Disaster Relief Supplemental Appropriations Act, 2023 (Public Law 117– 328). HUD allocated \$100,019,000 of that appropriation to the State of California for disaster recovery and mitigation activities as a result of the 2023 winter storms (DR-4683), with \$15,003,000 identified. HUD then allocated an additional \$85, 349,000 from which \$11,132,000 set aside from the FRN ([90 FR 21328](#)) as a “CDBG–DR mitigation set-aside amount.”

Although Public Law 117– 328 tied the disaster recovery portion of the total allocation to the State of California to the winter storms, the mitigation set-aside 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.

- State of California’s Hazard Mitigation Plan (SHMP)
- MID Local Hazard Mitigation Plans (LHMPs)
- CalOES’s Joint Hazard Mitigation Strategy

The Mitigation Needs Assessment is updated to consider the California SHMP and LHMPs as they relate to the MIDs for the 2023 winter storms events that occurred from December 26, 2022 – January 31, 2023 (DR-4683).

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HCD HAZARD MITIGATION PROGRAM

MITIGATION RESILIENT INFRASTRUCTURE PROGRAM (MIT-RIP) (FORMERLY  
MIGRANT RESILIENCY CENTER PROGRAM)

PHA	Migrant Centers	Allocation #1	Allocation #2	New Total Allocation
Stanislaus Regional Housing Authority ( <b>Santa Cruz County MID allocation</b> )	Buena Vista	\$3,668,715	<b>\$4,472,322</b>	\$8,141,037
Housing Authority County of <b>San Joaquin</b>	Harney Laney	\$4,585,894	<b>\$4,292,947</b>	\$8,878,841
Housing Authority of the <b>County of Merced</b>	TWO CENTERS: 1) Merced and 2) Felix Torres	\$4,847,946	<b>\$2,423,973</b>	\$7,271,919
Total		\$13,102,555	<b>\$11,189,242</b>	\$24,291,797

HCD has assessed over \$178 million in standalone hazard mitigation needs, in addition to HMGP unmet needs. Due to this need, HCD will increase the RRCP by \$10 million because of known needs. A total of 3 of 4 projects are LMI and Can count 40 percent of UN project as LMI.

## Method

The Mitigation Needs Assessment builds on documents developed by the State of California to address state and local mitigation efforts including: the SHMP, the LHMPs, data collected from county resources, other California state agency planning documents, 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-4683 impacted areas and responds to requirements set forth in the FRN. 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.

## State Hazard Mitigation Plan

The State of California's Hazard Mitigation Plan (SHMP) serves as the foundation for the Mitigation Needs Assessment. Drafted by the California Governor's Office of Emergency Services (Cal OES) and approved by FEMA in 2018, the SHMP is a federally mandated document that identifies hazards that could potentially affect

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California and lays out a state-wide plan to reduce loss of life and property that may be caused by a disaster. The SHMP underwent its latest update in August 2023. Cal OES led the development of the 2023 SHMP pursuant to 44 CFR part 201.4. For the 2018 SHMP, California utilized a State Hazard Mitigation Team consisting of horizontal and vertical stakeholder partners that met at least quarterly. For the 2023 SHMP, California adopted a Hazard and Working Group model. The Working Groups analyzed and counseled on overarching themes in the 2023 SHMP. The development of this Action Plan, as well as all California action plans and amendments since 2018, were directly informed by findings and risk assessment produced by the SHMP.

HUD requires an assessment of the State of California's most recent SHMP to inform the use of CDBG-DR funds for activities proposed in this plan. The following section provides an overview of the SHMP and examines the state's overall risks. As of January 2023, the 2023 SHMP remains a significant guiding document for the development of this Mitigation Needs Assessment.

The 2023 SHMP arranged risk assessments into groupings of hazards with similar characteristics. While the SHMP addresses a host of disasters with potential to impact the state, earthquakes, floods, and fires are still considered California's primary hazards. These three hazards have historically caused the greatest human, property, and/or monetary losses, as well as economic, social, and environmental disruptions within the state. They also have the greatest potential to cause significant losses and disruptions in the future. 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.

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 2023 SHMP. For flooding impacts specifically, 38 counties in California identified flooding as a high-risk hazard and 16 considered it medium risk. All 5 DR-4683 MID counties identified flooding as a high-risk hazard within their Local Hazard Mitigation Plans (LHMP).

#### 2023 IMPACTED COUNTIES BY HIGH FLOOD RISK

Flood	High	Amador, Mendocino, <b>Merced</b> , Monterey, Sacramento, <b>San Joaquin</b> , <b>San Luis Obispo</b> , Santa Clara, <b>Santa Cruz</b> , <b>Ventura</b>
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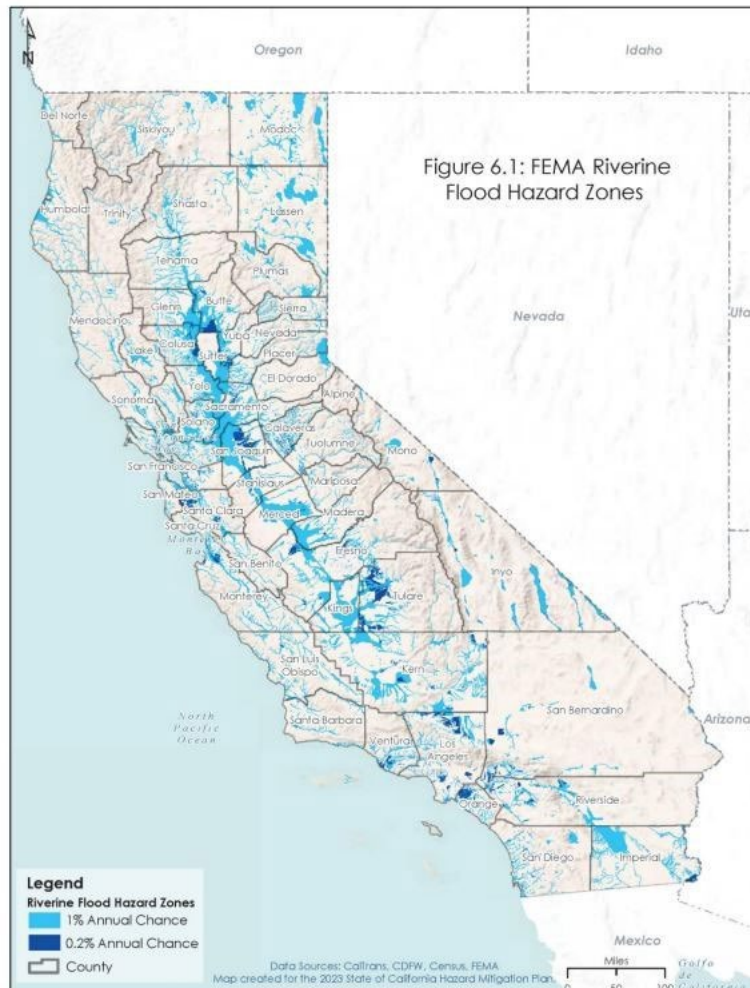
Source: 2023 SHMP, Section 2-13, page 71

#### 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.

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The figure below, produced by the California Department of Water Resources, shows the flood hazard areas throughout the state. The areas designated for one percent and .2 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.



Source: 2023 California State Hazard Mitigation Plan, Section 6.5, page 161

## Extreme weather event Change and Flood Hazards

Extreme weather event 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. Changes in snowfall or rainfall patterns can also contribute to a severe increase in flooding events. Extreme weather event change impacts the variability, intensity, frequency, and seasonal patterns of California's primary hazards. For example, larger and more frequent wildfires brought on by extreme weather event

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change reduce the ability of a landscape to retain rainfall, which often leads to flooding and mudflows. Every region in California experiences extreme weather event impacts but population vulnerability, scale, and severity vary statewide.

#### **Joint Hazard Mitigation Strategy**

The Joint Hazard Mitigation Strategy (April 2023) is a partnership between California Governor's Office of Emergency Services (Cal OES) and Federal Emergency Management Agency (FEMA) Region 9 to identify actions, goals and objectives for federal designated counties (DR-4683) damaged by the 2023 storm events, flooding, landslides and mudslides. The Joint Hazard Mitigation Strategy was a valuable resource to inform HCD of the appropriate uses of CDBG-DR funds for activities proposed in this plan.

Hazard Mitigation is defined in the Joint Hazard Mitigation Strategy and by FEMA as any sustained action taken to reduce or eliminate long-term risk to people and property from hazards and their effects. The intent is to enhance the communities' ability to prepare for and recover from future hazardous events by providing resources for identifying risks and vulnerabilities, establishing short and long-term strategies for protecting people and property as well as developing and implementing plans that will increase community resilience.

#### **Goals and objectives of the Joint Hazard Mitigation Strategy**

1. Partner with communities to identify, develop, and fund projects that reduce loss of life and injuries from future hazard events. Specifically, engage with communities to develop projects that achieve one or more of the following goals:
2. Protect a disadvantaged community.
3. Implement a nature-based solution to reduce risk and/or advance extreme weather event adaption goals.
4. Advance whole community risk reduction.
5. Protect large critical infrastructure.
6. Build local capacity in susceptible communities to develop local hazard mitigation plans and to identify, develop, and fund mitigation projects.
7. Prioritizing whole community plans that create a better picture of the risks to a planning area.
8. Building State, Local, and Tribal Capacity
9. All decisions and actions executed in this operation need to be designed with the intent of building State, Local, and Tribal capacity.

The highest priorities, in order of highest priority first, for Hazard Mitigation Grant Program (HMGP) project funding include 1) Development and updating hazard mitigation plans statewide, 2) Advance assistance for HMGP programs, 3) Shovel-ready and phased projects that meet certain criteria, 4) Planning activities, advance assistance, etc. for non-socially susceptible communities.

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**Winter Storm events of 2023**

From an incident period between December 26, 2022, to January 31, 2023, a total of nine atmospheric rivers in rapid succession drenched the state of California from north to south and back again with an estimated 32 trillion gallons of water, punctuated by days of damaging wind gusts. Widespread flooding, landslides, mudslides, and power outages occurred statewide. Heavy snowfall was seen in the eastern Sierra Nevada California mountain ranges, with totals up to 15 feet in the higher elevations. A total of 23 flash flood warnings were issued, and a total of five Moderate Risks for excessive rainfall were issued by the Weather Prediction Center. During this timeframe, several rivers exceeded their flood stage, with some even reaching their preliminary flood of record. The events tapered off around January 17, 2023, and the incident period closed on January 31, 2023.

**LHMP discussions**

California's Local Hazard Mitigation Plans (LHMPs) provide critical hazard and risk information for each county in the state as well as actionable and localized mitigation approaches identified by its authors. The table below illustrates which hazards each MID county identified as threats to their jurisdiction in their most recent LHMP. As seen below, the most commonly identified hazards in the areas designated as MIDs for DR-4683 are wildfires, floods, and earthquakes. This consistency bolsters the SHMP's state-wide hazard rankings and reinforces the prioritization of wildfire mitigation strategies in the state's long-term recovery plan. 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 flooding.



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**Local Hazard Mitigation Plans – Top Hazards**

<b>Hazard Mitigation Plans</b>	<b>Merced Multi-Jurisdictional HMP 2021</b>	<b>San Joaquin County LHMP 2023</b>	<b>San Luis Obispo County LHMP 2019</b>	<b>County of Santa Cruz LHMP 2021</b>	<b>Ventura County Multi-Jurisdictional HMP 2022</b>
Agriculture Pest and Disease					
Extreme weather event		X		X	
Cyber Attack					
Dam Incidents					X
Drought	X	X	X	X	X
Earthquake		X	X	X	X
Flood and Levee Failure	X	X		X	X
Hazardous Materials					
Landslide		X		X	X
Pandemic/Epidemic					
Sever Weather or Storms	X				X
Tsunami		X		X	X
Wildfire	X	X	X	X	X
Other Human Caused Hazard					

Source: DR-4683 MID Counties LHMPs

**Threat to Community Lifelines**

The following section identifies risks to indispensable services and community lifelines for the State of California. In July 2023, FEMA updated their Community Lifelines Implementation Toolkit which focuses on eight categories of Community Lifelines. FEMA defines these lifelines as enabling the continuous operation of critical government and business functions and are essential to human health and safety or economic security. Lifelines are the most fundamental services in the community that enable all other aspects of society to function. Lifelines are the integrated network of assets, services, and capabilities that are used day-to-day to support the recurring needs of the community. When a lifeline is affected by a disaster, survivors may experience disruptions which reduce their ability to receive critical services and recover from the effects of the incident.

- **Safety and security** – The destruction of communications infrastructure by flooding impacts first responder communications and emergency notification capabilities. Cellular communications, broadband, radio, and television

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infrastructure are susceptible to damage by flooding and can leave responders unable to coordinate and residents unable to receive critical evacuation or shelter orders.

- **Food, hydration, shelter** – Flooding can cause major property damage and destroy houses or other structures which creates a need for emergency shelter during evacuations. Flooding can also disrupt food distribution or food chains if flooding occurs in agricultural areas.
- **Health and medical** – 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.
- **Energy** – 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.
- **Communications** – The destruction of communications infrastructure by flooding severely impacts first responder communications and emergency notification capabilities. Cellular communications, broadband, radio, and television infrastructure are susceptible to damage by flooding and can leave responders unable to coordinate and residents unable to receive critical evacuation or shelter orders.
- **Transportation** – Transportation infrastructure (i.e., highways, bridges, railways) are susceptible to flooding which can severely impact emergency response and emergency evacuations of residents. The SHMP identifies the washout of State Route 74 during the February 2019 flash floods in Riverside County, which impacted movement of residents and emergency response capabilities.
- **Hazardous Material** – 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.
- **Water Systems** – Water storage facilities and delivery systems are at serious risk of flooding impacts. For example, increased runoff from rain events can overload storage capacity in dams and reservoirs, creating spillovers. Serious rain events can cause levee or dam failure.

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**COMMUNITY LIFELINE COMPONENTS**

<b>Safety &amp; Security</b>	<b>Food, Hydration &amp; Shelter</b>	<b>Health and Medical</b>	<b>Energy</b>	<b>Communications</b>	<b>Transportation</b>	<b>Hazardous Material</b>	<b>Water Systems</b>
Law Enforcement/ Security	Food	Medical Care	Power Grid	Infrastructure	Highway/ Roadway/ Motor Vehicle	Facilities	Potable Water Infrastructure
Fire Service	Hydration	Public Health	Fuel	Responder Communications	Mass Transit	HAZMAT, Pollutants, Contaminant	Wastewater Management
Search and Rescue	Shelter	Patient Movement		Alerts, Warnings, and Messages	Railway		
Government Service	Agriculture	Medical Supply Chain		Finance	Aviation		
Community Safety		Fatality Management		911 and Dispatch	Maritime		

Source: FEMA Community Lifelines Implementation Toolkit V 2.1, page 13

The focus of the Implementation Toolkit is organizing resources and activating lifelines for support during incident response. By identifying the most heavily impacted Community Lifelines, HCD will be able to focus CDBG-DR funds in those areas and provide long-lasting or permanent interventions, breaking the cycle of repeated federal, state, and local investment in the same susceptible 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.

## **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 eight 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. Extreme weather event, hazardous material release, and landslides/other earth movements are categorized as

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high threats due to their unpredictable nature and acute impacts to the Community Lifelines.

**STATEWIDE HAZARDS BY COMMUNITY LIFELINE (1 OF 2)**

<b>Hazard</b>	<b>Safety and Security</b>	<b>Food, Hydration, Sheltering</b>	<b>Health and Medical</b>	<b>Energy</b>
Agricultural Pest/Invasive species	Very Low Threat	Extreme Threat	Moderate Threat	Very Low Threat
Dam Failure	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Extreme weather event	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

Source: FEMA Community Lifelines Implementation Toolkit.

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**STATEWIDE HAZARDS BY COMMUNITY LIFELINE (2 OF 2)**

<b>Hazard</b>	<b>Communication</b>	<b>Transportation</b>	<b>Hazardous Material</b>	<b>Water Systems</b>
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
Extreme weather event	High Threat	High Threat	High Threat	Extreme Threat
Earthquake	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Flood	Extreme Threat	Extreme Threat	Extreme Threat	Extreme Threat
Hazardous Material Release	Moderate Threat	High 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	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

Source: FEMA Community Lifelines Implementation Toolkit.

### **Community Resilience Center Program**

The Community Resilience Center (CRC) Program under the California Strategic Growth Council (SGC) will fund new construction and upgrades of neighborhood-level resilience centers to provide shelter and resources during extreme weather events and other emergencies, such as extreme heat events and poor air quality days. The program will also fund ongoing year-round community services and programs, such as food distribution and workforce development training, that build overall community resilience.

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The Community Resilience Centers (CRC) program intends to build both extreme weather event resilience and community resilience across California. The program will fund physical infrastructure, including retrofits and new construction of facilities and accompanying campus amenities, as well as social infrastructure, including integrated delivery of services and programs to share knowledge, build networks, and strengthen capacity. CRC projects should balance shorter-term needs and longer-term needs, equip CRC Facilities with emergency activation capabilities and plans, and include year-round delivery of services and programs that build community resilience. CRCs also prioritize the most susceptible residents and communities in their decision-making, design, and implementation.

#### Goals and objectives of the Community Resilience Center (CRC) program

1. Offer multi-benefit physical community-serving spaces, resilient to current and future extreme weather event hazards;
2. Provide integrated delivery of essential services and programming to local communities during disasters, emergencies, and disruption events, as well as year-round to address ongoing community needs and build community cohesion;
3. Integrate physical infrastructure projects with social infrastructure, through community driven partnerships and programming to increase extreme weather event resilience, expand economic opportunities, and reduce health, environmental, and social inequities across California.
4. Leverage and build a skilled, diversified, and trained workforce and promote local workforce development and training opportunities, with a focus on preparing community members for high-quality career pathway jobs in a future net zero carbon economy that are resilient to current and future extreme weather event change impacts; and to
5. Build, strengthen, and sustain local leadership and grassroots engagement in civic and community development, and extreme weather event resilience awareness and activities.

The CRC program intends to balance both shorter-term emergency response needs, as well as longer-term ongoing community needs and services. Examples of shorter-term emergency response include HVAC improvements, food distribution, backup power, emergency preparedness presentation and trainings. CRCs are required to provide certain functions such as activation 24/7 in an emergency, provide necessary infrastructure for weather respite (heating, cooling, clean air centers or hydration stations), or act as evacuation or emergency response centers. CRCs must also have required features like ADA-compliant facilities, showers, shelter for people to sleep during emergencies, refrigeration, laundry services, etc. A key component of the CRC program is to achieve fairness in operations, investments, and policy initiatives across

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statewide. While all communities are eligible to apply, targeted work will occur to prioritize and reach out to priority communities. Priority communities include those that are under-resourced meaning they are classified as a disadvantaged census tract, have a median household income at or below 80 percent the statewide median income, or meet HCD's threshold of low-income designation.

### **Statewide flooding**

In terms of recent disasters and the probability of future destruction at increasing magnitudes, floods represent one of California's most destructive sources of hazard, vulnerability, and risk. 15 percent of the State's population lives within a 1 percent and 0.2 percent annual chance flood hazard area. Even more alarming, it is estimated that 41 percent of that population is identified as living in a low priority community.

### **Types of Flooding**

Riverine flooding occurs when rivers, streams, or lakes overflow their banks and adjacent areas are subject to excess runoff or accumulation of flowing water over areas.

Flash flooding is sudden, rapid flooding of low-lying areas usually caused by intense rainfall. It can be highly destructive such as dam failure, and can severely damage infrastructure, roads or buildings.

Localized flooding occurs when drainage systems are overwhelmed during or after rain events and causes pooling of water, creating flooding in local streets, yards or in structures.

Alluvial fan flooding occurs on alluvial fan landforms and are caused by sediment erosion from an upland water source.

### **Flood Risk**

Flood Insurance Rate Map (FIRM) are created by FEMA for use by communities to know which areas have the highest risk of flooding. FEMA maintains, updates data and assesses risk for areas to determine the likelihood of an area to flood. These maps delineate the Special Flood Hazard Areas (SFHAs), the Base Flood Elevations (BFEs) and the risk premium zones applicable to the community. Places with a 1 percent or higher chance of experiencing a flood each year are considered to be high risk areas. These measurements reflect statistical averages only, and it is possible for two or more floods with a 1 percent annual chance to occur in close timeframe. These maps are important in use for community planning efforts as they can help make informed decisions of where to make infrastructure improvements and lessen risk to people or property.

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All areas have risks of flooding, but some areas have a lower or more moderate risk than others. In California, every region can experience flooding in a variety of forms including flash floods or alluvial fan flooding. Between 1950 to 2022, California had 161 Federal or State emergency declarations related to flooding. On average, California experiences more than 20 flash flood events and just under 20 flood events per year. Certain parts of the state are more prone to flooding than other areas, and the frequency and damage caused by flood events can vary. While flood risk varies across the state, flooding damage can occur more frequently as more development is increasing within floodplain regions.

**Extreme weather event Adaptation Strategies/Hazard Mitigation**

According to the 2023 SHMP, adapting to the changing extreme weather event will require an approach to hazard mitigation that prioritizes long-term community resilience practices. Such practices aim to reduce harm for those who experience greater risk and burden of harm due to historical and current marginalization and under-investment, thus resulting in greater resilience across the whole community. Extreme weather events change is projected to continue in frequency, duration and intensity so greater preparation and planning for susceptible communities ultimately supports the long-term goal of risk reduction. It is projected that the frequency and severity of flooding events will increase over the next 30 years due to extreme weather event change impacts.



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**RETROFIT/EXTREME WEATHER EVENT MITIGATION STRATEGIES**

<b>Temperature/extreme heat/wildfire</b>	<b>Flooding</b>	<b>Storms</b>
Cool roof or light colored/reflective surfaces	Wet or dry floodproofing	Impact-rated windows, doors, garages, storm shutters, wind rated materials
Green roofs/green facades with vegetation, community gardens	Elevation of entire building or utilities	Sealed windows and exterior walls/roofs
HVAC systems, energy efficient appliances, generators, solar panels	Repurpose ground floor or fill in of basements	Connection of structural elements, strengthened roof deck
Features such as windows, blinds, curtains, exterior features	Water resistant materials (replace drywall with water-resistant materials like concrete or tile, also reduces risk of mold)	
High efficiency fixtures, labeled with EPA's Water Sense program.	Rainwater catchment systems, retention basins	
Enhanced air filtration/ember resistant vents, wildfire resistant roof, non-combustible materials		

Source: Resilient Retrofits, Extreme weather event Upgrades for Existing Buildings (2022)

**Statewide Plan Alignment for Equitable Recovery from Disasters**

The Governor's Office of Land Use and Extreme weather event Innovation (LCI), formerly known as Planning and Research (OPR) leads long range planning and recovery project implementation for extreme weather event resilience and sets equitable recovery goals for state agencies. HCD's proposed 2023 Action Plan and proposed programs align with these goals outlined by LCI and presents programs that allow disaster impacted communities with different capacity levels to have access to disaster recovery and mitigation programs.

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LCI prioritizes creating equitable recovery, disaster resilience, and extreme weather event change mitigation. HCD's proposed programs will integrate these principles as disasters, disaster recovery, and mitigation from natural hazards continue to impact the State of California and its residents. HUD requires CDBG-DR grantees to focus on susceptible populations in its recovery and mitigation activities. HCD and its state partners further that commitment by defining, identifying, and prioritizing susceptible populations in its recovery and mitigation programs. Social fairness should be a key consideration as susceptible populations may be most impacted by disasters.

In the context of extreme weather event adaptation, LCI and the Integrated Extreme weather event Adaptation and Resiliency Program (ICARP) define susceptible communities as:

*“Extreme weather event vulnerability describes the degree to which natural, built, and human systems are at risk of exposure to extreme weather event change impacts. Susceptible communities experience heightened risk and increased sensitivity to extreme weather event change and have less capacity and fewer resources to cope with, adapt to, or recover from extreme weather event impacts. These disproportionate effects are caused by physical (built and environmental), social, political, and/ or economic factor(s), which are exacerbated by extreme weather event impacts. These factors include, but are not limited to, race, class, sexual orientation and identification, national origin, and income inequality.”*

To further state identified goals and address extreme weather event vulnerability, HCD's proposed 2023 CDBG-DR and Mitigation program endeavor to align planning efforts at the state and local level, promote community resiliency to reduce extreme weather event risk, and develop planning documents that are used throughout government decision-making processes. For the proposed disaster recovery and mitigation programs, HCD will work to align program design to fit the following activities:

- Plan Alignment – align recovery and mitigation activities with existing state and local planning documents including:
  - General Plans (Housing and Safety Element), State Hazard Mitigation Plan, Joint Hazard Mitigation Strategy, Local Hazard Mitigation Plan, Local Coastal Programs
  - Encourage planning efforts beyond jurisdictional boundaries.
- Examples of implementation activities that advance the State's extreme weather event resilience/ mitigation and equitable recovery goals include:
  - Using nature-based solutions to reduce community extreme weather event risk, protect watershed health and reduce infrastructure costs.
  - Reduce risk of disaster impacts through the advancement of actions and mitigation strategies that increase community resiliency.
  - Support needs and priorities of underserved communities through public engagement and coordination with community partners.

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- Advance fairness by promoting short-term extreme weather event resilience activities or long-term development in LMI and susceptible communities that are disproportionately impacted by disasters.
- Hardening structures to reduce extreme weather event hazard risk to homes and businesses.
- Coordinating incentives for strategic land assemblage to conserve natural/working lands, restore natural landscape functions, and/or transfer redevelopment to lower-risk locations.

**Connection to Unmet Needs**

The allocations for each recovery program are based on the unmet needs analysis, which identified housing as a serious unmet recovery need. The FEMA IA declared counties for DR-4683 and the HUD defined MID areas were determined to be of most need based on FEMA determined areas of concentrated damage. The damage emphasized for DR-4683 was on manufactured homes and the susceptible populations living within these homes and the general impacted areas. Furthermore, the unmet need was created on limited data (verified property level information) in the defined impacted areas as detailed in the alternate methodology. The alternative methodology demonstrates a reasonable and proportional allocation of resource based on the alternative unmet need assessment based on greatest housing and infrastructure mitigation needs.

As required by the FRN 88 FR 82983, HCD will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a DR-4683 presidential major disaster declaration. However, due to the limited disaster recovery funds available and the amount of unmet need remaining in the MID areas, this Action Plan directs 100 percent of the funds to address unmet needs with the HUD-identified MID areas.

This action plan primarily considers and addresses the unmet need in the MID identified counties. Programs are developed to address the most severe unmet needs of most susceptible populations and in full compliance with the Federal Register Notice. The level of unmet recovery need identified in 2023 MID counties, far exceeds the amount available through the current 2023 funding allocation. With limited funds available, HCD must prioritize its limited funding on areas that provide a significant direct impact for those entities in the HUD MID, and a significant indirect impact to the beneficiaries served by these jurisdictions.

Given the small allocation size for DR-4683, limited set of potential projects with need, none of which benefited LMI communities, and availabilities of other state and federal infrastructure funds, HCD is not allocating any funds for infrastructure activities in the 2023 MID.

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As previously detailed in our alternative methodology, the CDBG-DR funded programs will also consider eligible CDBG activities and will be responsive to CDBG national objectives. Both housing programs and the proposed mitigation program will comply with all regulatory guidance issued to HCD, and considers best practices established through similar recovery initiatives.

In accordance with the Federal Register Notice directive to first address the unmet housing recovery need, the primary recovery needs include owner occupied housing replacement and elevation for single-family housing and affordable rental housing development via the Manufactured Home Replacement and Elevation and Disaster Recovery Multifamily Housing Accelerator Program. This Action Plan also addresses mitigation needs, including a portion of CDBG-DR mitigation set aside funding of critical infrastructure for the proposed Migrant Resiliency Center Program and owner-occupied housing mitigation retrofits. Therefore, any housing and mitigation projects funded with this allocation of CDBG-DR will have a documented contribution to the long-term recovery and restoration of housing.

## **General Requirements**

### **Citizen Participation**

In the development of this disaster recovery action plan, HCD consulted with other state agencies and departments, Indian Tribes, and local governments in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive. HCD also consulted with agencies that managed local Continuums of Care, Public Housing Agencies and HUD-approved housing counseling agencies, as well as nongovernmental organizations, and the private sector that were involved in the citizen participation process.

HCD recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through the many stakeholder meetings.

### **Outreach and Engagement**

The Action Plan presents an opportunity to define housing problems, educate, and create solutions for post disaster housing recovery needs. HCD recognizes the outreach challenges and encourages participation of citizens in all aspects of the State's CDBG DR program and implementation process, by going above and beyond the disaster recovery requirements.

In addition, disaster recovery programs and policies are aligning housing strategies with housing production, infrastructure improvements, and resiliency goals to mitigate future

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disasters. In proposed resilience-related activity descriptions, HCD will include outreach strategies to increase awareness of the hazards in MID-area communities.

The Outreach Plan outlines a comprehensive plan to inform stakeholders about the CDBG-DR grant and proposed programs, and to engage other federal and state resources to assist with recovery after a disaster. This plan identifies not only mandated outreach requirements, but also the broader set of stakeholders engaged with housing and community development in impacted areas.

### **Stakeholder Consultation**

Community outreach methods will seek to engage a diverse group of community members, including populations defined as protected classes by HUD. The broad set of stakeholders targeted for outreach include:

- Disaster Property Owners
- Disaster Affected Cities and Counties
- Affordable Housing Developers
- Voluntary, Charitable, Faith, and Community based Organizations
- Tribal Government
- Long-Term Housing Recovery Groups
- Non-Profits
- Government Agencies
- Local Emergency Management Agencies
- Public Housing Authorities (PHAs)
- Private Sector
- Organizations that represent protected class members and susceptible population

To facilitate outreach involvement, HCD will coordinate actions to encourage participation and allow equal access to information about the action plan. These methods include a variety of digital and non digital means, in multiple languages, and with varying levels of detailed information. These may include, but are not limited to:

- Print media, such as the newspaper (mandated for FRN)
- HCD's and other agencies social media
- State of California Governor's Office of Emergency Services (Cal OES), State of California Office of Land Use and Planning (LCI), formerly known as, Planning and Research (OPR), Department of General Services (DGS)
- HCD Emails and meeting announcements to Government Agencies
- HCD Emails to Affordable Housing Developers in DR counties
- HCD Emails and Meeting announcements to Voluntary Organizations and Non-Profits
- Announcements in interagency meetings
- Notices posted to HCD's CDBG-DR website in English and Spanish
- Direct mail and email to Tribal Government via HCD and Cal OES contact list

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- Interagency consultation and coordination
- HCD's Long-term Recovery Meetings Organized by Cal OES and FEMA
- Recovery Support Function Meetings (RSF)
- Virtual targeted community meetings in disaster impacted areas
- Virtual meetings with stakeholders listed above
- Broad HCD Distribution List
  - CDBG-DR program contact list
  - Other State and Federal program contact list
  - HCD's and Cal OES Tribal Initiative
  - HPD contact list

In addition to the activities above, HCD has published this action plan on the [HCD Website](#) for a 30-day public comment period. Citizens were notified through digital and non-digital means, in multiple languages, and with varying levels of detailed information. These may include, but are not limited to:

- Print media, such as the newspaper (mandated for FRN)
- HCD's and other agencies social media
- State of California Governor's Office of Emergency Services (Cal OES), State of California Office of Land Use and Planning (LCI), formerly known as, Office of Planning and Research (OPR), Department of General Services (DGS)
- HCD Emails and meeting announcements to Government Agencies
- HCD Emails to Affordable Housing Developers in DR counties
- HCD Emails and Meeting announcements to Voluntary Organizations and Non-Profits
- Announcements in interagency meetings
- Notices posted to HCD's CDBG-DR website in English and Spanish
- Direct mail and email to Tribal Government via HCD and Cal OES contact list
- Interagency consultation and coordination
- HCD's Long-term Recovery Meetings Organized by Cal OES and FEMA
- Recovery Support Function Meetings (RSF) Organized by Cal OES with State and Federal Agencies
- Virtual targeted community meetings in disaster impacted areas
- Virtual meetings with stakeholders listed above
- Broad HCD Distribution List
  - CDBG-DR program contact list
  - Other State and Federal program contact list
  - HCD's and Cal OES Tribal Initiative Groups
  - HCD's Housing Policy Department (HPD) contact list

### **Primary Stakeholder Group**

The primary stakeholders include mandated outreach per FRN as well as key partners helping communities' recovery from disasters. They include:

- Disaster Survivors

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- Affected Disaster Recovery Cities and Counties (multiple meetings)
  - Housing and Community Development Staff
  - Infrastructure Public Works/Debris Removal
  - Planning and Permitting
  - Emergency Response Managers
- Tribal Government in disaster declared areas
- Government Partners (multiple meetings)
  - California Governor's Office of Emergency Services (Cal OES)
  - Governor's Office of Land Use and Planning (LCI), formerly known as, Governor's Office of Planning and Research (OPR)
  - California Department of Forestry and Fire Protection (CalFire)
  - Department of Insurance (CDI)
  - Department of General Services (DGS)
  - Department of Water Resources (DWR)
  - California Department of Transportation (Caltrans)
  - Federal Emergency Management Agency (FEMA)
  - United States Department of Agriculture (USDA)
  - Housing and Urban Development (HUD)
- Public Housing Authorities (PHAs) and Continuum of Care (Coc's)
- Long-Term Housing Recovery Groups
- Disaster Case Managers
- Organizations that represent protected classes and susceptible populations

### **Secondary Stakeholder Advisors**

The secondary stakeholder comprises groups that are either not directly impacted by the disaster or mandated by the FRN. These secondary groups can assist primary stakeholders in their recovery needs and will benefit from awareness of disaster recovery efforts as the state implements various housing, transportation, or extreme weather event change policies. They include:

- Affordable Housing Developers in the disaster impacted counties
- Statewide organizations such as Housing California or California Housing Partnership Corporation
- Organizations that work primarily in rural communities, such as, Rural Community Assistance Corporation (RCAC)
- State and Local Hazard Mitigation Planners, Funders, and Implementers
- Legislative Offices and Policy makers
- Regional Planning Entities
- Universities and Research Groups

HCD Conducted the following consultations during the 2023 CDBG-DR Pre-Federal Register (FRN) Notice Meetings.

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Prior to release of FRN, HCD met with all the FEMA DR-4683 IA counties to explain the CDBG-DR processes and Action Plan requirements. This was critical since we are dealing with several overlapping disasters. CDBG-DR requires tie-back to use of funds, where it is critical for stakeholders and jurisdictions to understand the program and its requirements.

- Long-Term Recovery Group and Other State and Federal Agencies – September 11, 2023 and September 15, 2023
- Impacted Local Government – September 15, 2023 through October 30, 2023
- Disaster Case Managers and Local Charities – November 6, 2023

A summary of citizen comments on this action plan, along with HCD's responses, is in Appendix c of this document. For more information, citizens can refer to HCD's citizen participation plan that can be found on HCD's website.

See attachment A for details on the 2023 CDBG-DR Outreach Plan.

### **Public hearings.**

### **Types of Stakeholder Meetings**

There were multiple meetings for specific target groups and topics starting in September of 2023 and ending with final public comment meeting. HCD will advertise these public meetings 15-30 days prior in English and Spanish to all the stakeholders identified above according to HUD and HCD standards. A contact person's name was included for reasonable accommodation, translation services, and any other questions. Registration instructions for the meetings will be included in the announcements.

All notices of publications will run on February 28, 2024, in English and Spanish through HCD email blast, social media, and following publications: The Sacramento Daily Recorder, SF Daily Journal, LA Daily Journal and posted on HCD's website. There was an announcement of both the public comment period of 30 days (beginning February 28, 2024, and ending March 28, 2024) and the public meeting webinars held on March 20, 2024 at 6pm PST, in English, and March 21, 2024 at 6pm PST, in Spanish. HCD held three local public comment meetings during the public comment period.

The PDFs of these presentations can be found on HCD's 2023 Disaster Recovery website: [Disaster Recovery & Mitigation | California Department of Housing and Community Development](#). All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allowed for questions and answer in real time between public meeting participants and HCD staff (in both English and Spanish). All questions and answers received during the public comment period, either through the public meetings or through written comments to HCD staff are addressed in writing in this Action Plan.



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### **Pre-Federal Register (FRN) Notice Meetings**

Prior to release of FRN, HCD met with all the Individual Assistance counties identified in FEMA DR-4683 to explain the CDBG-DR processes and Action Plan requirements. This was critical since we are dealing with several overlapping disasters. CDBG-DR requires tie-back to use of funds, where it is critical for stakeholders and jurisdictions understand the program and its requirements.

### **Action Plan Development Meetings**

HCD held meetings with state agency partners and local governments about the specific 2023 CDBG-DR allocation requirements, processes, and updated timelines. These meetings will focus on the development of Action Plan document and preparation for public release and before the start of public comment period.

### **Public Comment Period Meeting**

HCD will hold two public hearings with CDBG-DR grantees and Disaster Survivors in English and Spanish after it has published on its website to solicit public comment and before submittal of the action plan to HUD. HCD will provide a period of 30 calendar days for comments on the Action Plan. Directions for submitting comments will be included in the public hearing notice. Comments can be submitted to the Department via mail, email, or by telephone through the contact information provided on webpages on the Department's website, or by reaching out to the contact information provided in the public notice.

As part of the public hearing process, all efforts will be made to accommodate participation for individuals with disabilities and/or limited English proficiency individuals with appropriate auxiliary aids and services offered to ensure effective communication.

The HCD disaster recovery team will develop FAQ (Frequently Asked Questions) for the HCD website after the first public meeting and update throughout the planning process. The presentation materials will be shared with all attendees and meeting recordings will be posted on the HCD website. All public comment questions will be answered in a timely manner and added to the Action Plan and posted to the HCD website.

### **Complaints**

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)). HCD will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on [Community Development Block Grant \(CDBG\) - Disaster Recovery \(DR\)](#) to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse. The Fraud, Waste, and Abuse Policies and Procedures are included in HCD's Grant Administration Manual.

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#### **Public Website**

HCD will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through [HCD's CDBG-DR Action Plan for 2023 Disasters](#). Specifically, HCD will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, HCD will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. All materials uploaded onto the website will be published in a form accessible to persons with disabilities and limited English proficiency (LEP) individuals. The documents being uploaded onto the CDBG-DR Program website are translated in accordance with HCD's Citizens Participation Plan. The website can also be translated into a variety of languages, including Spanish, using one-click translation at the top of each page. The website is maintained in a manner that is accessible to persons with disabilities, in accordance with 24 CFR 8.6, and HCD's ADA policies that can be found at this link: <https://www.hcd.ca.gov/accessibility>

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

#### **Amendment**

Over time, recovery needs will change. Thus, HCD will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop overtime an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

#### **Substantial Amendment**

A change to this action plan is considered to be a substantial amendment if it meets the following criteria:

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- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity,
- A proposed reduction in the overall benefit requirement, or
- The allocation or reallocation of \$30,000,000

When California pursues the substantial amendment process, the amendment will be posted here at [HCD's Website](#) for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. California will review and respond to all public comments received and submit to HUD for approval.

There are additional circumstances for which HCD is required by the Consolidated Notice, 87 FR 6364, to submit a substantial amendment.

A substantial amendment is needed if the method of distribution for a program is not known at the time HCD submits the action plan to HUD. Method of distribution descriptions must include:

- Eligibility criteria for assistance. This includes description of all exceptions that may be provided on case-by-case basis.
- Associated national objectives for each program.
- Description of the maximum amount of assistance (i.e., award cap) available to a beneficiary under each of the disaster recovery programs.
- Projected uses for the CDBG-DR funds, by responsible entity, activity, and geographic area.
- Identify all allocation criteria involved in method of distribution to local governments or Indian tribes. The criteria must be identified in the action plan or substantial amendment and approved by HUD before distributing the funds to a local government or Indian tribe.
- Identify all criteria, and the relative importance of each criterion, and any eligibility requirements, used to select applications for funding. This is applicable to applications solicited for programs carried out directly.

The amendment must also provide the description of resale or recapture requirements and for which activity the use is proposed if this differs from the description provided in the initial action plan. The resale or recapture requirements must clearly describe the terms of resale or recapture and the specific circumstances under which resale or recapture will be used.

### **Non-Substantial Amendment**

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. HCD will notify HUD five (5) business days before the change is effective.

All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

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### **Flood Insurance Requirements**

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). HCD may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. HCD is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120 percent AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.
- To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:
  - The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
  - The household earns less than 120 percent AMI and has unmet recovery needs.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120 percent AMI or the national median and has unmet recovery needs.

### **Construction Standards**

HCD will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)

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- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

HCD will use *housing construction codes of the State of California* for the proposed programs or activities.

For rehabilitation of non-substantially damaged residential buildings, HCD will follow the guidelines to the extent applicable as specified in the [HUD CPD Green Building Retrofit Checklist](#). When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP) – designed products and appliances.

For infrastructure projects, HCD will encourage, to the extent practicable, implementation of housing construction codes of the State of California.

### **Contractors Standards**

Contractors selected under HCD will make every effort to provide opportunities to low- and very low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. Grantees may elaborate on specific steps to promote Section 3. HCD will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Policy and procedures for the Manufactured Home Replacement and Elevation Program will include a description of the standards to be established for construction contractors performing work in the jurisdiction and the mechanisms that HCD will use to assist beneficiaries in responding to contractor fraud, poor quality work, and associated issues as well as details on the warranty period post construction. The Manufactured Home Replacement and Elevation Program policy and procedures will also address the program's mechanism for homeowners to appeal rehabilitation, replacement, and elevation work.

The Program will follow the program's policy and procedures to assure that construction costs are reasonable and consistent with market costs at the time and place of construction.

### **Preparedness, Mitigation and Resilience**

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

To integrate hazard mitigation and resilience planning with recovery efforts HCD will promote sound, sustainable, long-term recovery planning informed by post-disaster

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evaluation of hazard risk, including extreme weather event-related hazards, and the creation of resilience performance metrics.

This Action Plan includes a mitigation needs assessment that reviews the hazards and risks to the 2023 impacted communities and a demographic analysis examining the susceptible populations within the impacted area. HCD is not currently proposing to use the 2023 allocation to fund a resilience planning program, since several other state agencies (including LCI, CalOES, DWR, and CalFire) all provide such planning grants. HCD is proposing to use its CDBG-DR Mitigation set-aside to enhance housing stock for seasonal farmworkers and for community resiliency centers to house underserved or LMI populations in future disaster response and sheltering needs. This Action Plan provides information on California State Plans and funding sources for resilience planning in the Mitigation Needs Assessment section (2.d. Mitigation Only Activities).

HUD defines resilience for CDBG-DR grantees as a “community’s ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks”HCD’s construction related programs include construction standards that will incorporate resilience and hazard mitigation measures into CDBG-DR funded activities.

In response to 88 FR 82982 this Action Plan must align with existing FEMA or other state, local, or tribal hazard mitigation plans. In addition, mitigation measures must be incorporated when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds.

### **Broadband Infrastructure in Housing**

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

### **Cost-Effectiveness**

#### **The Manufactured Home Replacement and Elevation Program**

The primary objective of the Manufactured Home Replacement and Elevation Program is the provision of decent, safe, and sanitary housing in the areas impacted by the DR-4568 disaster. Additionally, the program is designed to ensure that the housing needs of very-low, low- and moderate-income households and susceptible populations, including

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individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

The program will provide rehabilitation or replacement assistance to eligible applicants based on the extent of damage to their primary residences. The maximum amount of assistance available for rehabilitation and replacement of MHU's is \$350,000 per damaged structure after applying any duplication of benefits reductions.

### **Demonstrable Hardship**

HUD requires HCD to define "demonstrable hardship" and any related exceptions to program policies for applicants who demonstrate undue hardship. A demonstrable hardship is defined as a substantial change in a household's situation that prohibits or severely affects their ability to provide and maintain a minimal standard of living or basic necessities, such as food, housing, clothing and transportation, causing economic distress well beyond mere inconvenience. A demonstrable hardship must occur after the floods and must be documented with objective evidence.

The demonstrable hardship must be of a severe, involuntary and unexpected nature, and not generally for the same reasons shared with other households affected by the disaster. Examples of demonstrable hardship may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. However, there is no one event that automatically defines a demonstrable hardship. HCD will consider each applicant's overall situation if a demonstrable hardship is claimed, and documentation can be provided showing the cause and other factors relevant to the issue of demonstrable hardship.

### **Duplication of Benefits**

A duplication of benefits occurs when an impacted person, household, business, government, or other entity receives financial assistance from multiple sources such as FEMA, USACE, EDA, insurance, etc. for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. A duplication of benefits (DOB) review will be applied to all CDBG-DR activities. In determining an applicant's unmet need, subrecipients must follow HCD's DOB policy. The process for determining any duplicates includes assessing the need, identifying the total assistance available to the applicant deducting benefits received for a different purpose, deducting funds received for the same purpose but different eligible use, and funds not available. Once the duplicated funds have been identified and subtracted from the unmet need amount, any remaining unmet need can be assisted with the CDBG-DR funds.

All agreements between HCD and beneficiaries, and HCD and subrecipients require all sources of possible duplicative assistance to be disclosed to HCD. Additionally, a

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subrogation clause contained in these agreements requires any person who receives further assistance to repay that assistance, if the amount of assistance exceeds the funding required for the project.

#### **4. Grantee Proposed Use of Funds**

##### **Overview**

HCD is the lead agency and responsible entity for administering \$200,371,000 in CDBG-DR funds allocated for disaster recovery and hazard mitigation.

These programs include two housing recovery programs to address the unmet recovery need in the HUD MID areas: the 2023 Manufactured Home Replacement and Elevation Program, and a Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL). The Mitigation Resilient Infrastructure Program and an Owner-Occupied Mitigation set-aside provides for CDBG-DR Mitigation funds to assist mitigation projects in MID.



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**Program Budget**

<b>Program Category</b>	<b>Program</b>	<b>Budget</b>	<b>HUD Identified MID Budget</b>	<b>Grantee Identified MID Budget</b>	<b>% of Allocation</b>	<b>Maximum Award</b>
<b>Housing</b>	Rehab	\$35,250,000	\$35,250,000	\$0	30.65%	\$350,000
	Buyout	\$0	\$0	\$0	0%	\$0
	New Construction	\$59,017,900	\$59,017,900	\$0	51.31%	\$0
	Other			\$0		\$0
<b>Economic Revitalization</b>	Workforce Training	\$0	\$0	\$0	0%	\$0
	Business Grants	\$0	\$0	\$0	0%	\$0
	Other	\$0	\$0	\$0	0%	\$0
<b>Infrastructure</b>	Water/sewer Improvements	\$0	\$0	\$0	0%	\$0
	Health Facilities	\$0	\$0	\$0	0%	\$0
	Other			\$0		\$0
<b>Public Services</b>	Legal Services	\$0	\$0	\$0	0%	\$0
	Housing Counseling	\$0	\$0	\$0	0%	\$0
	Other	\$0	\$0	\$0	0%	\$0
<b>Mitigation</b>	Mitigation	\$15,003,000	\$15,003,000	\$0	13.04%	\$0
<b>Admin</b>	Admin	\$5,751,100	\$5,751,100	\$0	5%	\$0
<b>Planning</b>	Planning	\$0	\$0	\$0	0%	\$0
<b>Total</b>	<b>\$115,022,000</b>	<b>\$115,022,000</b>	<b>\$0</b>	<b>100%</b>		

Data Source: 2023 Unmet Needs Analysis

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<b>Programs</b>	<b>Current Budget \$115M</b>	<b>Proposed +\$85M</b>	<b>Total \$200M</b>
<b>Mitigation Total (15%)</b>	\$15,003,000	\$10,576,170	\$25,579,170
Migrant Resiliency Center expanded to Mitigation Resilient Infrastructure Program (MIT-RIP)	\$15,003,000	\$4,256,058	\$19,259,058
Owner Occupied Mitigation – (Ventura Only)	\$0	\$6,320,112	\$6,320,112
<b>Housing Total</b>	\$94,267,900	\$70,505,380	\$164,773,280
DR-MHP Accelerator	\$59,017,900	\$70,505,380	\$129,523,280
Manufactured Home Replacement and Elevation	\$ 35,250,000	\$0	\$35,250,000
Admin	\$5,751,100	\$4,267,450	\$10,018,550
<b>Total DR-4683 Allocation</b>	\$115,022,000	\$85,349,000	\$200,371,000

### Leveraging Funds

Over the last three decades, HCD has provided more than \$3 billion in funding for the development of affordable housing and associated infrastructure. HCD manages non-entitlement programs, providing leadership and policies to preserve and expand safe and affordable housing opportunities and promote strong communities for all Californians. By administering programs that provide grants and loans from both state and federal housing programs, HCD can leverage existing programs to increase the impact of CDBG-DR funding.

To maximize the impact of the CDBG-DR funding provided to the state, there will be an ongoing commitment to identify and leverage other federal and non-federal funding sources. HCD will also utilize existing relationships and strive to create new partnerships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of leveraging all viable sources of funding.

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CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources, including FEMA and SBA. Existing state resources and other funds from the disaster appropriation will also be examined to ensure that all available funding is used where it is most needed.

Furthermore, the state has designed all housing programs in this Action Plan to cover the gap in funding remaining after insurance, and other assistance has been applied to each project. Understanding the limited funding for recovery, the state will encourage all program applicants to seek out other funding sources to meet their full recovery needs.

The state has authorized many housing programs that may complement the recovery effort. These programs are either competitive or are issued based on a formula allocation; no loans or grants are made directly to individual households. Cities, counties, qualified CHDOs, affordable housing corporations, and other qualified applicants may apply to build more affordable housing in their community to speed recovery.

#### **Program Partners**

Not applicable to program design.

#### **Distribution of Funds**

HCD will distribute funds to beneficiaries using one of two methods: 1) HCD administered programs and 2) local government and non-profit organization (known as “subrecipients”) administered projects.

#### **Eligible Geographic Location - 2023 HUD MID Areas**

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HCD will spend 100 percent of the 2023 DR Allocation, to include the mitigation set-aside, in the HUD MID areas.

The following counties make up the MID areas for DR-4568: Merced, Santa Cruz, San Luis Obispo, San Joaquin, and Ventura. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

#### **Criteria to determine the method of distribution**

Funds are distributed among proposed programs using an objective methodology targeted towards the Most Impacted and Distressed counties identified earlier in this document. Distribution methods are designed to consider the unique context and needs of affected populations as well as the administrative capacity of jurisdictions that will manage the local recovery process. This methodology ensures that CDBG-DR funds will be used to maximum benefit to address unmet housing recovery, and mitigation needs.

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As required by the Federal Register Notice, HCD conducted an assessment of its internal capacity during program planning and design. The capacity assessment concluded that, with organizational and staffing adjustments at HCD, the Department can successfully launch and directly manage housing recovery accelerator program.

HCD also assessed the capacity of local governments to administer CDBG-DR funded programs during recovery planning and coordination discussions. This assessment included evaluations of localities' familiarity with key federal grant administration requirements, experience managing programs similar to those proposed in this Action Plan, and ability to add necessary capacity and subject matter expertise through hiring or procurement.

Through the conversations and working sessions with local officials, HCD gained a clear understanding of local strengths and how best to leverage the capacity and expertise at the local level. These assessments concluded that local governments are best positioned to operate and manage project specific funding related to MHU replacement and elevation as well as the mitigation program.

The level of unmet recovery need identified in both eligible 2023 counties, as well as the MID counties far exceeds the amount available through the current 2023 funding allocation. With limited funds available, HCD must prioritize its limited funding on areas that will make the most impact for low and moderate income, federally protected classes, and susceptible populations. In an effort to maximize its impact, HCD proposes to use the 2023 funds to focus on unmet housing needs.

As discussed in the Unmet Needs section, there are unmet recovery needs across all eligible activities. The needs assessment influenced the development and prioritization of recovery activities outlined in the Action Plan. HCD consulted with affected citizens, stakeholders, local governments, social services providers, public health agencies, flood plain management agencies, and public housing authorities within the most impacted and distressed areas (HUD MID) to assess needs. The full list of consultations is available in the Appendix (A).

HCD consulted with the Cities and Counties impacted by the 2023 disasters, details of these consultations can be found in the Appendix A. With limited CDBG-DR resources available, HCD is committed to utilizing the state resources available to them to meet the needs of unhoused populations in the impacted area. HCD conducted data analysis on federally protected classes within the 2023 disaster impacted area and consulted with service providers and local governments that work with susceptible populations.

The proposed CDBG-DR programs encourage applicants to prioritize susceptible populations in the Manufactured Home Replacement and Elevation Program and through project selection in the Multifamily program. In addition, HCD proposes to leverage other state funding available to support the needs of susceptible populations in the impacted area. Following the guidance in the federal register notice, along with

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California's existing affordable housing crisis, the State will focus its 2023 CDBG-DR resources primarily on housing program in MID areas.

**Disaster Recovery Multifamily Housing Accelerator Program**

For the Multifamily Housing Accelerator Program, HCD will use housing accelerator style program that enables shovel-ready affordable housing projects that, despite having received one or more awards from other HCD programs, are unable to move forward due to funding gaps that resulted from their inability to access tax-exempt bond allocations or low-income housing tax credits.

HCD is aware that disasters disproportionately affect LMI households, and that this disparate impact, combined with pre-disaster vulnerabilities, make the recovery process especially challenging for susceptible populations and underserved communities. LMI households are also more likely to be displaced during and after a disaster due to limited resources and a diminished stock of affordable, available, and safe housing.

**Manufactured Home Replacement and Elevation Program**

HCD will provide funding to subrecipients based on disaster impacts in the MID counties on manufactured housing units and unmet needs to that jurisdiction. The sum of this allocation of funds disbursed for each subrecipient's jurisdiction divided by the total damage data is the proportionate share of funding. This allocation also ensures that 100 percent of MHU recovery funds are spent in MID areas. Based on the information gathered from DCMP's and local governments, the priority population for the program will be the LMI owners of MHUs that have been severely damaged or are not suitable for rehabilitation. The general demographic for older MHU's are LMI households as well as seniors. This program will prioritize MHU owners with largest need.

**Protected Classes**

In addition, HCD also considered the impacts to protected classes as part of the program design and method of distribution. For each program, an analysis of the data and potential impacts was conducted and incorporated into the design. HCD has described the potential impacts and barriers that each protected class may encounter as a result of the program proposed, and mitigating steps taken through program design and implementation. Furthermore, HCD understands the ever-changing world of disaster recovery and mitigation programs and is committed to revisiting and analyzing these impacts throughout the life of each program.

**Race/Ethnicity**

**Manufactured Housing Replacement and Elevation Program**

Historic redlining and discriminatory lending practices have historically disadvantaged communities across the United States and the State of California. Property values in

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redlined and susceptible communities result in lower housing values that may impact the benefit limitations, award caps, and thresholds of a housing recovery program. While barriers to homeownership remain and access to capital for home repair remains unequal, HCD's Manufactured Housing Replacement and Elevation Program prioritizes susceptible populations and includes hands on case management to ensure that outreach is conducted to the most susceptible populations with Limited English Proficiency recovering from the disaster.

The program subrecipient will follow HCD's affirmative marketing procedures for outreach to LMI population in the protected class groups least likely to apply to the Manufactured Home Replacement and Elevation Program. The program will require the subrecipients to proactively reach to the most susceptible populations (persons over age 65 and persons with access and functional needs), including coordination with disaster case managers for outreach to LMI population in the protected class groups least likely to apply to the Manufactured Home Replacement and Elevation Program with limited English Proficiency.

### **Mitigation Program**

Each year during the planting and harvesting season agricultural farm workers and their families migrate from their homes to work in California's fields and canneries. The Office of Migrant Service (OMS) centers have been used as emergency shelters during the off season, between November and March for DR-4683 and 4699, as well as prior federally declared disasters in 2018 and 2020. HCD's proposed 2023 Mitigation program will provide capital improvements for OMS centers to improve building standards and install infrastructure that can both provide enhanced opportunities to temporary shelter susceptible populations in future disasters. Additionally, during non-disaster period, the OMS centers will also provide improved housing for seasonal farmworkers. Seasonal farmworkers have the least amount of resources to support their housing needs in California's housing crisis.

### **Households with Children**

#### **Manufactured Housing Replacement and Elevation Program**

The housing crisis impacting the State of California limits the number of housing types available for residents, including families with children. The lack of appropriately sized homeownership opportunities may lead to overcrowding or unsafe conditions. From 2015 to 2020, the greatest number of fair housing complaints, as reported by DFEH and FHEO, were attributed to discrimination based upon disability, followed by discrimination based upon race, and then by discrimination based upon familial status. HCD's program is open and available for all household sizes.

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**Disaster Recovery Multifamily Accelerator Program**

As with homeownership, households with children face a limited supply of affordable housing opportunities across the state of California. Disaster exacerbates this availability of different unit sizes and affordability, pushing impacted households, including families with children further from the disaster impacted areas. The MHP program allows for a variety of unit sizes and are projects are screened for their tie-back to the disaster, ensuring that rental housing is sited appropriately for renters. The MHP program also requires an AFHMP that ensures equal access to CDBG-DR funded properties.

**Persons with Disabilities**

Analysis of impacts from DR-4683 did not identify a disproportionate impact to persons with disabilities. That said, HCD is committed to ensuring equitable access for persons with disabilities. HCD includes the following in its policies and procedures to ensure equal access for persons with disabilities:

"In accordance with Section 504 of the Rehabilitation Act of 1973 requirements, necessary accommodations are made to ensure that eligible elderly persons and persons with special needs can successfully participate in the Program. special accommodation by presentation of a mobility card, or presentation of proof of SSDI benefits." "Additional modifications to increase accessibility for applicants or household members of applicants who have access and functional needs is an allowable part of the repair, reconstruction, or relocation assistance provided by the Program."

**Persons over the age of 65**

Many of the rural communities impacted by the 2023 disaster have a higher proportion of residents over the age of 65 compared to the state overall. Many residents over the age of 65 are on fixed incomes, or face barriers to rebuilding after a disaster. Due to the health and safety issues, many of the fatalities from flooding have included persons over the age of 65. Merced, San Joaquin, and Santa Cruz County had the highest number of MHU owners over the age of 65 impacted by the 2023 disaster. The HCD is coordinating with DCMP's to assist all applicants, including those over the age of 65 through the application process. The Subrecipients will be required to include case management team that will adapt to the needs of the population to ensure they have access to the program. This includes meeting in person with applicants, providing paper applications in different languages, and assisting applications throughout the rebuilding process.

**Disaster Recovery Multifamily Accelerator Program**

HCD's multifamily Universal Scoring Criteria awards points to applications that include units serving Older Adults in Need of Supportive Services, which includes individuals who are age 55 or older and who need supportive services to maintain and stabilize their housing.

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**Population with Limited English Proficiency**

MHU owners whose primary language is not English are provided vital Program documents (e.g., brochures and any relevant forms, applications, surveys, etc.) as well as other tools for guidance translated to their native language. By translating and providing Program documents into their native language, all homeowners are given reasonable opportunity to understand Program requirements. As a standard practice, Program documentation is translated into Spanish. Translation into other languages is completed upon request. The case management team has team members on staff who are able to directly manage households where English is not the primary language.'

**Disaster Recovery Multifamily Housing Accelerator Program**

All developers are required to submit an AFHMP (Affirmative Fair Housing Marketing Plan) as part of their application and a program threshold. The AFHMP must include how the developer will complete outreach and marketing to ensure those with limited English proficiency have access to the affordable housing units. Each AFHMP is reviewed by HCD as part of the program application and NOFA process.

**HCD Administered**

HCD will directly operate the Multifamily Accelerator Program and follow HCD's Multifamily Program's guidelines.

**Subrecipient Administered**

HCD will engage with subrecipients to administer the Manufactured Housing Rehabilitation and Elevation as well as Mitigation Programs. All projects will be vetted for CDBG-DR compliance and eligibility, ensuring that proposed projects adhere to federal requirements and the requirements set forth in the Action Plan and program policies and procedures. 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. More specific program details can be found in the Program Section of this Action Plan.

**Reimbursement Payments to Subrecipients**

HCD operates on a reimbursement basis for all CDBG-DR and MIT projects. All costs must be incurred and paid for by the subrecipient prior to HCD providing 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 FI\$Cal and Grants Network, the financial system and systems of



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record for the state and HCD. Processes for monitoring expenditures of subrecipients and payment processing are outlined in HCD's Grant Administration Manual (GAM). Under certain conditions, subrecipients may incur costs prior to the effective date of their grant agreement. The subrecipient may then pay those costs (including reimbursing itself if it used its own funds to pay the costs) after the effective date of the grant agreement. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with written approval of HCD.

If pre-award costs (also known as pre-agreement costs) are incurred for an eligible activity listed in this action plan, the payment for eligible costs must comply with the pre-award regulations at 24 CFR 570.200(h) and 570.489(b) and follow the guidance issued by HUD in the Community and Planning Development (CPD) notice 15-07. Full eligibility criteria will be provided in the program policies and procedures and will be made available during the project application phase.

### **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 and must be expended by the subrecipient prior to additional grant funds being drawn. 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, quarterly, all program income to HUD through the HUD Disaster Recovery Grant Reporting system (DRGR). 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 track through the Standard Agreement system of record.

### **Resale or Recapture**

#### **Manufactured Home Replacement and Elevation Program**

Under the Manufactured Home Replacement and Elevation Program an applicant may be required to repay all, or a portion of the assistance received from the Program. The reasons for grant recapture may include the following reasons:

- Providing false or misleading information to the MHRE
- Withdrawal from MHRE prior to completion of the project. Withdrawal from the program must be in writing or email and a new survey and application will be required if the applicant wishes to participate again.
- Construction is not completed due to non-cooperation by owner(s).

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- Non-compliance with the approved SOW in a manner that would make the home ineligible (i.e., did not comply with lead paint abatement requirements).
- Failure to report the receipt of additional insurance, SBA, FEMA, non-profit assistance and/or any other DOB received after award.

To address any potential future DOB, applicant beneficiaries must, as a requirement for participating in MHRE, agree to enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, after an award is issued, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

### **Disaster Recovery Multifamily Housing Accelerator Program**

New construction, rehabilitation, or reconstruction of rental projects with more than 5 units shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55-years.

DR-ACCEL policies and procedures provide that a Developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements of 55-years for the entire period specified in the agreement.

## **b. Program Details**

### **Housing Program**

#### **2023 Manufactured Home Replacement and Elevation Program**

<b>Grant Type</b>	<b>Grant Number</b>	<b>Proposed Budget</b>	<b>Proposed HUD-Identified MID Budget</b>	<b>Proposed Grantee-Identified MID Budget</b>
<b>Parent</b>	<b>B-23-DG-06-0001</b>	\$36,250,000	\$36,250,000	<b>\$0.00</b>

#### *Narratives*

- **Program Description**

The primary objective of the Manufactured Home Replacement and Elevation (MHRE) Program is the provision of decent, safe, and sanitary housing in the areas impacted by the DR-4683 disaster. Additionally, the program is designed to ensure that the housing needs of very-low, low-, and moderate-income households and susceptible populations, including individuals that were made homeless as a result of the disaster, are addressed to the greatest extent feasible. Furthermore, the program will not only address disaster-related damages but also will mitigate potential future damage.

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The program will provide assistance to eligible applicants based on the extent of damage to their MHU primary residences. The maximum amount of assistance available for replacement and elevation of a unit is \$500,000 per damaged structure after applying any duplication of benefits reductions. This amount is intended to cover the cost of purchase, installation, and elevation of MHU at 2 feet above Base Flood Elevation (BFE) or higher if required by locally adopted regulations known as Design Flood Elevation (DFE).

- **Program Tieback to Disaster/Unmet Needs**

HCD will spend 100 percent of the 2023 CDBG-DR allocation in the HUD MID areas. The MHUs must have been damaged or destroyed as a result of the qualifying disaster and located in mobilehome parks in the MID counties.

The data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan. The data provided by the Disaster Case Management providers and local governments identified the greatest owner-occupied post disaster housing needs as those related to manufactured housing units in mobilehome parks impacted by DR-4683. The damage data demonstrated need across all five MID counties.

**MANUFACTURED HOUSING UNITS IMPACTED IN MID COUNTIES DR-4683**

2023 MID Counties	# of damaged MHU's	Total Unmet Needs	Percent of Unmet Needs
<b>Santa Cruz</b>	9	\$4,500,000	3%
<b>Merced</b>	105	\$52,500,000	35%
<b>San Joaquin</b>	121	\$60,500,000	41%
<b>Ventura</b>	4	\$2,000,000	1%
<b>San Luis Obispo</b>	57	\$28,500,000	20%
<b>Totals</b>	296	\$148,000,000	100%

Source(s): Local Disaster Case Managers, Impacted Mobilehome Park Owners and HCD CDBG-DR 2017-2018 OOR Program.

While HCD recognizes that some single-family stick- built housing was impacted by DR-4683, information provided through FEMA and SBA data as well as DCMP and local governments did not indicate eligible households for CDBG-DR resources. Other funding sources, such as HOME Program or the State funded CalHOME Program are a better match for the impacted stick-built population. Furthermore, HCD has partnered with state public agencies to monitor for any mold related health impacts in DR-4683 impacted counties. As of January 22, 2024, California Department of Public Health's Center for Preparedness and Response (CPR) and Environmental Health Epidemiology Investigations (EHEI) both report having no collected data indicating post flood outbreaks or clusters of health impacts related to

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mold exposure in DR-4683 counties. CDPH CPR checked their Regional Disaster Medical Health Specialists/Coordinators (RDMHS/C) reports for any post flood mold related health impacts occurring at the local level and found none.

- **How Program will Promote Housing for Susceptible Populations**

Applicants eligible for the Manufactured Home Replacement and Elevation Program funding must be LMI and the unit must be their primary residence located in mobilehome parks in the MID counties. Residences must have experienced at least \$3,000 in damage to the MHU from the qualifying disaster as evidenced by FEMA's Preliminary Damage Assessment. The \$3,000 damage level is the minimum threshold for HUD's definition of Minor-High damage. The 2023 flood damages had different levels of water damage inside the impacted units. A minor damage poses health and safety risk to disaster survivors and their housing needs especially for MHU. Information provided by DCMP, and local governments identified senior household impacted by flooding in mobilehome parks that had unmet needs.

Since, MHUs represent a significant portion of the non-deed restricted affordable housing stock in DR-4683 MID counties. This program will fill the gap for the susceptible population of MHU owners and provide sustainable and resilient housing options. This program will also pay for enhanced elevation of 2 feet above Base Flood Elevation (BFE) or higher if required by locally adopted regulations known as Design Flood Elevation (DFE) to ensure long-term sustainability and resiliency. If the rehabilitation cost exceeds the purchasing of a new MHU, this program will replace the unit and provide for anchoring and elevation when appropriate. New MHU's are built to higher standards and will provide safe and affordable housing for a longer period of time.

#### Affirmative Marketing

The program subrecipient will follow HCD's affirmative marketing procedures for outreach to LMI population in the protected class groups least likely to apply to the Manufactured Home Replacement and Elevation Program. The program will require the subrecipients to proactively reach the most susceptible populations (persons over age 65 and persons with access and functional needs), including coordination with disaster case managers and persons with limited English Proficiency.

Affirmative marketing plans shall include specific and meaningful targeted outreach efforts to reach those populations identified as least likely to apply for the housing opportunity. For more information on federal and state protected classes, see HCD's 2020 Analysis of Impediments to Fair Housing:

<https://www.HCD.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>

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**Mobilehome Residency Law Protection Program**

HCD's Division of Codes and Standards is responsible for implementing a variety of regulatory and administrative tasks related to MHUs in California. These include tasks such as titling and registration for each MHU in California as well as mobilehome residency and renter protection programs. The Mobilehome Residency Law Protection Act of 2018 Assembly Bill 3066 (Chapter 774, Statutes of 2018) authorized HCD to implement programs to help resolve some of these disputes that can arise between mobilehome/manufactured homeowners and park management. The Mobilehome Assistance Center (MAC) receives and processes complaints from the public and from public officials related to living conditions in manufactured homes and mobilehomes. Staff provides information, coordination, referrals, and other assistance to help resolve complaints generally related to:

- The operation of mobilehome parks related to health and safety matters.
- The purchase, sale, financing, titling, and registration of manufactured homes and mobilehomes.
- The installation, inspection, and maintenance or alteration of manufactured homes, mobilehome accessory structures, and park grounds.

Subrecipients will inform program applicants about services available through MAC through distribution of outreach materials.

- **Program Affordability Period**

There is no affordability period for MHRE Program projects.

- **Program Definition of Second Home/Eligibility**

Assistance for second homes is not an eligible activity.

- **Program National Objective**

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR funded activities must satisfy a national objective. All replacement activities will meet either the urgent need or LMI housing national objective criteria related to disaster recovery.

As stated in the Needs Assessment, the location of the disasters presents unique challenges for addressing housing impacts. The disasters impacted households of all incomes and landscapes, including suburban neighborhoods and rural communities. While there are regional differences in the housing markets, all of the impacted areas struggle to provide an adequate supply of affordable homes to area residents. The dollar amount directed towards the Manufactured Home Replacement and Elevation Program reflects the type of tenure of housing losses

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in the qualifying disaster. This program aims for 100 percent of funds to be used towards the LMI national objective by requiring beneficiaries to be LMI households.

- **Program Eligibility**

*Owner-Occupants*

Applicants who are owner-occupants will be eligible to participate in the MHRE Program if they meet the following criteria:

- Must have owned the MHU at the time of the qualifying disaster.
- Must have occupied the MHU's as their primary residence at the time of the qualifying disaster.
- The MHU must have sustained at least \$3,000 in damage from the qualifying disaster as evidenced by FEMA's Preliminary Damage Assessment.
- Must be LMI, as defined by the CDBG Program.
- The Applicant must have a valid lease for the lot on which the replacement MHU is installed and must be located in a mobilehome park that has an active permit to operate.
- The damaged residence must be a mobilehome or manufactured housing unit (i.e., not a stick-built single-family home, condominium, duplex, fourplex, or other multi-owner property).

Subrecipients will assess applicant eligibility on a case-by-case basis according to the eligibility criteria fully defined in the program policy and procedures.

- **Program Responsible Entity**

The Manufactured Home Replacement and Elevation Program is delivered at the local level under the guidance of HCD's housing subject matter experts and contract managers.

HCD is the responsible entity across programs. HCD may consult with subrecipients for gathering information. HCD will do all tier 1 review to ensure consistency across methodology and geography.

- **Program Maximum Assistance**

The maximum amount of assistance available for the Manufactured Home Replacement and Elevation Program is \$500,000 per damaged structure after applying any duplication of benefits reductions.

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**Demonstrable Hardship**

HUD requires HCD to define “demonstrable hardship” and any related exceptions to program policies for applicants who demonstrate undue hardship. A demonstrable hardship is defined as a substantial change in a household’s situation that prohibits or severely affects their ability to provide and maintain a minimal standard of living or basic necessities, such as food, housing, clothing and transportation, causing economic distress well beyond mere inconvenience. A demonstrable hardship must occur after the flood and must be documented with objective evidence. Exceptions to hardships will be detailed in the program policies and procedures.

The demonstrable hardship must be of a severe, involuntary and unexpected nature, and not generally for the same reasons shared with other households affected by the disaster. Examples of demonstrable hardship may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. However, there is no one event that automatically defines a demonstrable hardship.

Subrecipients will consider each applicant’s overall situation if a demonstrable hardship is claimed, and documentation can be provided showing the cause and other factors relevant to the issue of demonstrable hardship.

- **Program Estimated Begin and End Dates**

The Manufactured Home Replacement and Elevation Program is expected to commence following HUD’s approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

- **Other Program Details**

HCD will provide technical assistance to subrecipients including program policies and procedures that will outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating applications and approving MHU replacement and elevation projects.

**Priority Population**

Based on the information gathered from DCMP’s and local governments, the priority population for the program will be the owners of MHUs in mobilehome parks that have at least \$3,000 in damage from DR-4683.

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**Program Competitive Application Overview**

Not Applicable.

- Program Method of Distribution Description/Overview**

HCD will distribute grant funds to beneficiaries through subrecipients to administer the Program. Local governments and nonprofit organizations are eligible to serve as subrecipients within the program.

Subrecipient-Administered Allocation Amount is shown below based on Manufactured Housing Impacts from 2023 disasters, DR-4683 in the MID Counties. This data set was provided by DCMP and local impacted mobilehome park owners.

*Allocation Methodology*

Funding is available to subrecipients based on a formula to determine a proportionate share of the total program allocation based on the disaster impacts to that jurisdiction. This allocation also ensures that 100 percent of MHU recovery funds are spent in MID areas.

2023 MID Counties	# of Damaged MHU's	Percent of Total Damaged MHU's	Local Allocation
Santa Cruz	9	3%	\$0
Merced	105	35%	\$10,384,706
San Joaquin	121	41%	\$10,899,756
Ventura	4	1%	\$0
San Luis Obispo	57	20%	\$10,938,837
Total	296	100%	\$ 32,223,299

- Santa Cruz County:** Santa Cruz County requested a reallocation of the funding originally provided to the County for the Manufactured Housing Replacement and Elevation (MHRE) Program. Citing a lack of unmet need for an MHRE program, Santa Cruz has identified a Resilient Infrastructure Program would better serve the recovery needs of their community. Data collected from multiple outreach efforts support the lack of an unmet need for a county administered MHRE program of large scale. Data provided by Disaster Case Managers suggests that a very low number of manufactured housing units (MHU's) in the county were still damaged as of November 2024. According to their estimates, only approximately nine MHU owners in Santa Cruz County needed possible assistance. Additionally, in January 2025, HCD conducted outreach to 33 mobilehome park



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owners in Santa Cruz County. HCD connected with 16 of the 33 mobilehome park owners, all of whom reported zero flood related damages to units.

- **Ventura County:** Ventura County also requested a reallocation of the funding originally provided to the County in the MHRE program. Citing a lack of unmet need for an MHRE program, Ventura County identified an Owner-Occupied Mitigation (OOM) program would better serve the recovery needs of their community. Data collected by HCD from multiple outreach efforts support the lack of unmet need for an MHRE program in Ventura County. Data provided by Disaster Case Managers in November 2024 show a very low number of MHUs in Ventura County were still damaged. According to their estimates, approximately 4 MHU owners in Ventura County needed possible assistance. Additionally, in January 2025, HCD conducted outreach to 21 mobilehome park owners in Ventura County. HCD was able to connect with 7 of the 21 mobilehome park owners, all of whom reported zero flood related damage to units.

### **Delivery**

The Manufactured Home Replacement and Elevation Program will be administered and monitored by HCD. However, HCD will enter into a subrecipient agreement with local governments to manage the CDBG-DR funds and the Program.

HCD will leverage internal resources, bring on staff to increase capacity and expertise, and procure a consultant to provide technical assistance, maintaining the responsibility of overseeing the program and compliance of individual projects. Subrecipients will be responsible for outreach, implementation, and oversight of approved projects, with regular monitoring by the state.

- **How Mitigation Set-Aside Activities Will Meet Definition of Mitigation?**

The Federal Flood Risk Management Standard (FFRMS) applies to Federal investments. Structures that experience a loss, would be required to build to newer elevation standards (both FFRMS and TMAC requirements) when rebuilding. In general, the higher a structure is above the Base Flood Elevation (BFE) – 100-year floodplain – the less likely the structure is to have a loss.

Parallel to these FEMA driven approaches, the American Society of Engineers (ASCE) will be updating building code best practices, including incorporating requirements for different types of structures to be elevated to at least 1 foot above the BFE, and possibly incorporation of 2 feet elevation requirements to align with FEMA proposal for the FFRMS.

Therefore, HCD is requiring that replacement of MHUs to be installed at 2 feet above Base Flood Elevation (BFE) or higher if required by locally adopted regulations known as Design Flood Elevation (DFE) and include proper

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anchoring of MHUs. These two factors will mitigate impacts from future floods and help protect investment made by this grant.

- **How Mitigation Set-Aside Activities will Address Current and Future Risks?**

Impacts from DR-4683 were due to floods; this program not only replaces but elevates and anchors MHU's' to mitigate against future flood impacts.

Projection of Expenditures and Outcomes

**See Appendix B for HCD's 2023 Projections and Outcomes for MHRE and DR-ACCEL Programs**

Disaster Recovery Multifamily Housing Accelerator Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-06-0001	\$129,522,380	\$129,522,380	\$0.00

*Narratives*

- **Program Description**

The Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL) is designed to meet the unmet rental housing needs of LMI populations, including the needs of individuals displaced from rental mobilehomes, single-family and multifamily rental units, as well as individuals made homeless as a result of the disaster. Multifamily projects include apartment complexes and mixed-use developments. The objective of the CDBG-DR funds is to provide necessary gap financing for the development of rental housing units in the HUD MID areas from DR-4683.

The DR-ACCEL Program is proposed to close gaps for MF projects that have received a direct award from at least one HCD multifamily housing loan program prior to the closing date for the DR-ACCEL round one application. Projects that have secured such funding must have included and received approvals for affirmative marketing and outreach plans in accordance with HCD's funding program procedures and requirements, including efforts to reach those least likely to apply, and persons with limited English proficiency. In addition, applicants must have also demonstrated that proposed projects will affirmatively further fair housing as condition of state MF awards.

HCD multifamily housing funding program requires developers to demonstrate that proposed projects will affirmatively further fair housing, and are likely to

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lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, non-minority areas in response to natural hazard related impacts.

Projects must commit to an affordability period of 55-years. If other funds requiring a longer affordability period are committed to the project, the longest affordability period will prevail for the project.

- **Program Tieback to Disaster/Unmet Needs**

HUD requires that 80 percent of CDBG-DR funding be spent within areas designated as Most Impacted and Distressed (MID areas). HCD will spend 100 percent of the 2023 DR Allocation, including the mitigation set-aside, in the HUD MID areas for DR-4683. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan. LMI renters receive the least amount of resources after disasters yet face the largest need for housing. The housing programs were allocated based on data from DCMPs. Based on data provided by DCMPs, the largest group of LMI populations impacted by DR-4683 are renters, who plan on continuing renting.

The following counties make up the MID areas for DR-4683: Merced, Santa Cruz, San Joaquin, San Luis Obispo, and Ventura. Data sources relating to these MID counties are further explained in the Unmet Needs Assessment section of this Action Plan.

One of the prioritization criteria is distance to DR-4683 flooded areas. Project closest to DR-4683 and not in 100-year flood plain areas will receive more points for this program.

- **How Program will Promote Housing for Susceptible Populations**

*Affirmative Marketing and Fair Housing*

The DR-ACCEL Program applications must have secured funding from at least one other HCD source. All HCD funding sources include requirements for affirmative marketing plans as well as commitment to fair housing and outreach to protected classes.

*Prioritization Criteria*

This program is intended to be an accelerator type program and close gaps for MF projects that have secured at least one funding source from an HCD multifamily housing loan program prior to the closing date for the DR-ACCEL round one application and yet face gaps limiting ability to initiate construction. Projects that meet this criterion will be prioritized based on the number of affordable units, fund leveraging, distance from the flood, and readiness. The

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tiebreaker is based on affordability levels and targeting homeless or at-risk of homelessness.

HCD will develop an application to gather required information. At the close of the application period, projects receiving the highest points will initiate negotiations to execute subrecipient or development agreements.

- **Program Affordability Period**

New construction, rehabilitation, or reconstruction of rental projects with more than five (5) units shall be deed restricted by a Regulatory Agreement for a minimum affordability period of 55-years.

MHP policies and procedures provide that a Developer may be required to repay all, or a portion of the funds received. The reasons for recapture include not meeting the affordability requirements for the entire period specified in the agreement.

- **Program Definition of Second Home/Eligibility**

Not applicable to DR-ACCEL Program.

- **Program National Objective(s)**

In accordance with 24 CFR 570.208, all CDBG-DR funded activities must satisfy a national objective. For the Multifamily program, all projects will meet the low to moderate income housing national objective. While proposed projects may be mixed-income, CDBG-DR funds will only be applied to the affordable units restricted for occupancy by low-to-moderate-income households.

- **Program Eligibility**

Eligibility of multifamily housing project proposals will be assessed by HCD. Specific eligibility criteria include:

Threshold Criteria

The MHP is intended to close gaps for multifamily housing projects that have secured at least one funding source from an HCD multifamily housing loan program prior to the closing date for the DR-ACCEL round one application and yet face gaps limiting their ability to initiate construction. Additional threshold criteria include:

- The proposed project must be located in a MID area, DR-4683.
- The application must be complete, using unaltered application forms and including all required attachments.

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- The application must include an authorizing resolution that the Department reasonable deems legally sufficient.
- The application and proposed project are in compliance with the requirements specified in the Program Policies and Procedures.
- The project shall not have commenced construction.
- The project must demonstrate financial feasibility for the 20-year DR-ACCEL loan term and commit to a 55-year affordability period.
- The project must comply with all federal cross cutting requirements, including prevailing wage, Section 3, and environmental review.
- If located in a floodplain, the project must meet the CDBG-DR elevation requirements and maintain flood insurance into perpetuity.
  - Projects may not be located in the floodway.

Projects that meet this threshold criteria will be scored in accordance with the scoring criteria and tiebreaker criteria (if applicable) below.

HCD will develop an application to gather required information. At the close of the application period, projects receiving the highest points will receive an award and the Department will enter into one or more agreements with the project developer.

### **Program Responsible Entity**

The DR-ACCEL is administered and monitored by HCD. HCD will publish program policies and procedures to govern the program and ensure compliance with the established program policies and procedures, regulatory requirements, and broader recovery goals. HCD is responsible for overseeing the program, publishing and reviewing applications to develop new construction multifamily project units or substantially rehabilitate multifamily project units.

Multifamily developments funded under this CDBG-DR grant will adhere to standard requirements set by HCD to ensure compliance. All requirements of the MHP will be outlined in detail in the program policies and procedures. HCD will provide technical assistance to awarded developers to ensure compliance with CDBG-DR requirements and consistency with the program policies and procedures. In addition, periodic risk-based monitoring of the project construction will be conducted to test compliance and ensure timely project completion. HCD is solely responsible for making awards to successful applicants, facilitating execution of appropriate agreements including regulatory agreements to restrict MHP units within a project for a period of not less than 55-years, and overseeing compliance with all requirements of the MHP policies and procedures.

Once HCD selects projects and announces awards, the form of agreement with successful applicant developers will be a Standard Agreement which will define each party's obligations, commit funding to the project, establish timelines and

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milestones, and reiterate relevant compliance requirements. HCD will be responsible for monitoring developer or contractor compliance with construction advertisement and notification to minority and women-owned businesses of contacting opportunities available for the federally assisted project. HCD will monitor labor standards compliance and compliance with HUD's Section 3 quantitative and qualitative benchmarks.

- **Program Maximum Assistance**

The maximum amount of program funds available for awards is approximately \$ 129,522,380. An applicant may apply for the full amount of the project's remaining funding gap, not to exceed the available award amount. There is no per project cap for this program.

The previous allocation of \$59,017,0000 was intended to fund up to two projects. With the additional allocation of \$70,505,380, for a total program allocation of \$129,522,380, the DR-ACCEL Program can fund up to five projects.

- **Program Estimated Begin and End Dates**

The DR-ACCEL program will begin following HUD's approval of the Action Plan and execution of the grant agreement with HUD and HCD. Individual construction timeframes will be specific to each selected application.

- **Program Competitive Application Overview**

Applications that pass the initial threshold review will be scored using the Scoring Criteria detailed below. In the event of tied point scores, HCD shall rank tied applications pursuant to the tiebreaker scoring system detailed below. Incomplete applications or others not expected to receive an award of funds due to relatively low scores may not be fully evaluated. The Department reserves the right to provide partial awards should funds remain after fully funding the gaps of top scoring projects.

Scoring Criteria	Breakdown	Points
Number of units	Highest points go to projects with the most affordable units.	Within the pool of applications, Highest number of affordable units gets 5 points, Next highest gets 4 points, etc.

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Leverage	Points based on lowest per unit request for program funds.	5 points = less than \$100k/unit 4 points = \$101k - \$200k/unit 3 points = \$201k - \$300k/unit 2 points = \$301k - \$400k/unit 1 point = \$401k – 500k/unit 0 points = \$501k+
Readiness	Demonstrated readiness to commence construction within 180 days of award. Confirmed site control, entitlements, funding commitments. HCD is the responsible entity across programs. HCD may consult with subrecipients for gathering information. HCD will do all tier 1 review to ensure consistency across methodology and geography.	Up to 20 points. 5 points may be scored by each criterion: confirmed site control, entitlements, funding commitments and environmental review.
Distance from DR-4683 floods	Points based on the project's proximity to the impacted areas.	5 points = 0-10 miles 4 points = 11-20 miles 3 points = 21-30 miles 2 points = 31-40 miles 1 point = 41-50 miles 0 points = 51+ miles HCD will determine each project's proximity to DR-4683 flooding based on

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		agency geospatial data.
<b>Tiebreaker Scoring System</b>		
Homeless, Special Needs and Other Population Targeting	<p>Homeless Targeting: 0.3 points awarded for each percentage of total project units restricted to occupancy by households experiencing homelessness, including:</p> <p>1) At Risk of Homelessness, as defined in 24 CFR Part 578.3; 2) individuals who are experiencing Homelessness and individuals experiencing Chronic Homelessness as defined under the federal Continuum of Care Program at 24 CFR Part 578.3; 3) homeless youth as defined in Government Code Section 12957, subdivision (e)(2).</p> <p>; or</p> <p>Large Family, ELI and Special Needs Targeting: 0.2 points awarded for each percentage of total project units that are <u>not</u> restricted to occupancy by households experiencing homelessness and are either:</p> <p>1.3+ bedrooms</p> <p>2.Restricted to occupancy by ELI households</p> <p>3.Restricted to a special needs population defined as one or more following groups who need Supportive Services (“Supportive Services” means social, health, educational, income support and employment services and benefits, coordination of community building and educational activities, individualized needs assessment, and individualized assistance with obtaining services and benefits) to maintain and stabilize their housing: (1) people with disabilities; (2) agricultural workers (3) individuals with substance use disorders; (4) frequent users of public health or mental health services, as identified by a public health or mental health agency; (5) individuals who are fleeing domestic violence, sexual assault, and human trafficking; (6) families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; (7) individuals exiting from institutional settings or at risk of placement in an institutional setting; (8) Older Adults in Need of Supportive Services (individuals who are age 55 or older and who need Supportive Services); or (9) other specific groups with unique housing needs as determined by the Department. Special Needs Populations does not include “seniors or veterans” unless they otherwise qualify as a “Special Needs Population” as required by other statutory laws.</p>	

- **Program Method of Distribution/Description/Overview**

The DR-ACCEL is a competitive Accelerator type program to close the gaps for eligible projects and is open to projects in all MID counties. HCD may consider overall geographic distribution for final selection of Accelerator projects.



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- **How Mitigation Set-Aside Activities Will Meet Definition of Mitigation?**

Not applicable.

- **How Mitigation Set-Aside Activities Will Address Current and Future Risks?**

Not applicable

**Projection of Expenditures and Outcomes.**

**See Appendix B – 2023 Projections and Outcomes for MHU and MHP Programs**

**Owner-Occupied Mitigation (OOM) Program**

<b>Grant Type</b>	<b>Grant Number</b>	<b>Proposed Budget</b>	<b>Proposed HUD-Identified MID Budget</b>	<b>Proposed Grantee-Identified MID Budget</b>
<b>Parent</b>	<b>B-23-DG-06-0001</b>	<b>\$6,320,112</b>	<b>\$6,320,112</b>	<b>\$0.00</b>

**Narratives**

- **Program Description**

The OOM Program aids eligible homeowners of owner-occupied residential structures in Ventura County to incorporate wildfire and flood Mitigation measures, including the use of ignition resistant building materials and the creation of Defensible Space, to increase the level of protection against future disasters.

- **Program Tieback to Disaster/Unmet Needs**

Not applicable.

- **How Program will Promote Housing for Susceptible Populations**

The program subrecipient will follow HCD's affirmative marketing procedures for outreach to LMI population in the protected class groups least likely to apply to the OOM Program. The program will require the subrecipients to proactively reach the most susceptible populations (persons over age 65 and persons with access and functional needs), including persons with limited English Proficiency.

Affirmative marketing plans shall include specific and meaningful targeted outreach efforts to reach those populations identified as least likely to apply for the housing opportunity. For more information on federal and state protected classes, see HCD's 2020 Analysis of Impediments to Fair Housing:

<https://www.HCD.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf>

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- **Program Affordability Period**

There is no affordability period for OOM Program projects.

- **Program Definition of Second Home/Eligibility**

Assistance for second homes is not an eligible activity. However, Accessory Dwelling Units (ADUs) are eligible if either the main home or ADU are owner-occupied.

- **Program National Objective**

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR funded activities must satisfy a national objective. All OOM Program activities will meet either the urgent need or LMI housing national objective criteria related to disaster recovery.

- **Program Eligibility**

Applicant Eligibility Criteria:

- Applicant must be a U.S. Citizen or a qualified alien to receive federal public benefits
- Applicant must demonstrate they had ownership/ownership interest and occupied the home as their primary residence at the time of the qualifying disaster. (Second Homes, vacation homes, and rental properties are not eligible for assistance under the Program).
- Applicant must currently occupy the property as their primary residence.
- Applicant must be current on property taxes or have an approved payment plan or tax exemption.
- Applicant(s) must have legal authority to complete an application, provide certifications and accept their Grant Award.
- Applicant must allow access to the property for all necessary Program staff.

Property Eligibility Criteria:

- Property must be located in Ventura County
- The property must be a single-family dwelling on a permanent foundation or affixed to a permanent pad (leased or owned pad), such as a stick-built, modular, mobilehome or MHU. The Program may provide assistance for more than one primary residential unit on the same property i.e. main home and ADU on one site.
- There must be a registered, metered electrical connection on-site.
- There must be site access to a water source, and it must have sufficient water flow rate to support the structure.
- Home site must be connected to a wastewater treatment system (septic or city sewer).

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- Building code compliance must be easily attainable by the Program.

Ineligible Structure Types:

- Structures found not to be structurally sound, rely on non-standard building practices to maintain structural integrity, or where mitigation efforts would pose a risk to the safety and security of the home are not eligible for assistance.
- Structures that are not safe, sanitary, and secure to an acceptable level will not be eligible for assistance.

- **Program Responsible Entity**

The OOM Program is delivered at the local level by Ventura County under the guidance of HCD's housing subject matter experts and contract managers.

HCD is the responsible entity across programs. HCD may consult with subrecipients for gathering information. HCD will complete the Tier 1 environmental review to ensure consistency across methodology and geography.

- **Program Maximum Assistance**

The maximum award is \$100,000 per eligible Household for both wildfire and flood Mitigation items. All assistance will be provided in the form of a CDBG-DR grant. The Program understands that the maximum award may not allow for all necessary mitigation the home needs.

As such, the Program will institute the following "Level of Importance" approach in developing scopes of work that increase the level of protection against wildfires and flooding. Funding will first be allocated to items that are the highest level of importance ("Level 1"), then to lower levels in order until either there are no more mitigation items or the maximum award of \$100,000 is reached.

Items marked with \* indicate flood mitigation items.

<p><b>GOAL FOR LEVEL 1:</b> To protect the envelope of the home from fire and water intrusion and install a Zone 0 protective (5'-0") barrier around the primary structure without altering aesthetics.</p>	<p>1.01 – Remove any debris/combustible material items and vegetation (live or dead) under and within five feet (5'-0") from each structure, excluding decks and pergolas, unless deteriorated. 1.01A * – Provide minimal grading away from the home to achieve positive drainage. 1.02 – Install pea gravel or other non-combustible hardscape under and within five feet (5'-0") from each structure, and if applicable, an attached deck in Zone 0. 1.03 – Remove any tree limbs and brush (live or dead) that is within five feet (5'-0") from each Zone 0 structure. Must</p>
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	<p>have ten feet (10'-0") above roof and ten feet (10'-0") away from any chimneys and stovepipe outlets.</p> <p>1.04 – Remove any combustible material items and vegetation (live or dead) on roof, including roof covering, roof valleys, and gutters.</p> <p>1.05 – Remove any deteriorated and combustible features which are within the area of a means of egress from the structure that are within (5'-0") of primary structure, which include combustible porches, stairs and landings, ramps, and railings. Replace it with ignition resistant standard grade material.</p> <p>1.06 – Remove any deteriorated combustible decks and/or pergolas attached to structure, that are beyond repair, and replace with ignition resistant standard grade (Class A fire rating, heavy timber, or other materials meeting building code standards) steps and landings (5'-0" x 5'-0" or 5'-0" x 10'0").</p> <p>1.07 – Enclose underside of elevated porches, stairs, landings, decks, ramps, and steps with ember resistant wire mesh to prevent combustible material accumulation and penetration of embers.</p> <p>1.08 * – Coat exposed foundation/stem wall/perimeter foundation with waterproof coating paint and sealant.</p> <p>1.09 * – Seal penetrations in walls up to the flood line with waterproof coating paint and sealant.</p> <p>1.10 * – Seal cracks in windows and doors which are below the flood line.</p> <p>1.11 – Replace the following vents with OSFM approved flame and ember resistant vents. These include fresh air intake, dryer, attic, gable, soffit, and under-floor ventilation vents. *Switch to flood vents in foundation walls. If not feasible for replacement vents, then provide 1/8" mesh or 1/16" mesh over existing vents.</p> <p>1.12 – Repair any deteriorated areas or holes in combustible roof eaves, soffit, or fascia to prevent ember penetration into roof cavity.</p> <p>1.13 – Repair or remove and replace damaged or deteriorated windows, doors, siding, shingles, or other critical items affecting the living conditions of the applicant and home, with non-combustible materials.</p> <p>1.14 – Install metal flashing around the bottom, tops and sides of combustible garage doors to seal from embers.</p> <p>1.15 – Install a spark arrestor for non-compliant chimneys and stovepipes.</p> <p>1.16 – Provide 6 vertical inches of noncombustible siding applied at roof to wall intersection, at ground-level and</p>
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	<p>above any attached horizontal surface (e.g. deck or patio). Acceptable noncombustible siding materials include exposed concrete foundation, fiber-cement siding, brick, stone, stucco, or metal flashing; also apply this standard to the bottom of combustible deck posts.</p> <p>1.17 – Remove any attached combustible fences, gates and retaining walls and replace with noncombustible alternative, up to eight feet (8’0”) on each side of the primary structure.</p> <p>1.18 – Remove damaged gutters, or plastic gutters and downspouts and/or install metal gutters, gutter guards, downspouts, and underground downspouts.</p> <p>1.19 – Replace AND/OR install aluminum window, door and sliding glass door screens.</p> <p>1.20 – Install visible address marker on structure for emergency services if not clearly visible from street.</p> <p>1.21 * – Provide grading away from home. Fix any negative slopes. If not possible to grade, dam around house using 4’ or less retaining walls or riprap.</p> <p>1.22 * – Install berms, swales and/or French drains around house.</p> <p>1.23 * – Provide resident with deployable flood barriers on doors and windows below the flood line.</p> <p>1.24 * – Install flood shutters, flood logs, flood gate on doors and windows below the flood line.</p> <p>1.25 * – Plant vegetation and add mulch on hills sloping towards property to control erosion.</p>
<p><b>GOAL FOR LEVEL 2:</b> Clear Defensible Space per CalFire Requirements working from Zone 1 (5’-0” to 30’0”), Zone 2 (30’-0” to 100’-0”) to reduce ember quantity and travel.</p>	<p>2.01 – (CalFire Requirements) Remove all dead trees, plants, grass and weeds, dead or dry leaves, pine needles, cut lumber and firewood piles within 30’ radius of primary structure – Zone 1 (5’-0” to 30’-0”).</p> <p>2.02 – (CalFire Requirements) Trim all live tree branches to a minimum of 10’ from other trees within 30’ radius of primary structure – Zone 1 (5’-0” to 30’-0”).</p> <p>2.03 – Create 10 feet (10’-0”) of clearance of bare soil and nonflammable vegetation around and under all outbuildings, and if applicable, an attached deck, in Zone 1 (5’-0” to 30’-0”).</p> <p>2.04 – Create 10 feet (10’-0”) of clearance of bare soil and nonflammable vegetation around all outbuildings and wood piles in Zone 2 (30’-0” to 100’-0”).</p> <p>2.05 – Remove any combustible material items and vegetation (live or dead) on roofs, or structures in Zone 2 (30’-0” to 100’-0”).</p> <p>2.06 – (CalFire Requirements) Cut or mow grass and shrubs to a minimum of 4” high in Zone 2 (30’-0” to 100’-0”).</p>

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	<p>2.07 – (CalFire Requirements) Create horizontal and vertical space between shrubs and trees in Zone 2 (30'-0" to 100'-0"). Removing all tree branches 6' from ground, and all shrubs from under trees. Dead needles, leaves twigs and bark permitted to depth of 3."</p> <p>2.08 – Demolish and remove any Accessory Buildings which cannot be mitigated.</p>
<p><b>GOAL FOR LEVEL 3:</b> Once Level 1 and Level 2 items are exhausted, then minimal alterations to aesthetics of home by repairing or replacing combustible items or items beyond useful life.</p>	<p>3.01 – Remove any combustible roof attachments (Solar Panel Mounts, HVAC Roof Mounts, Antenna Mounts, etc.) and replace them with non-combustible metal attachments.</p> <p>3.02 – Repair up to Two Hundred Square Feet (200' SQFT) of existing roof with Class A asphalt shingles, underlayment, with ember-resistant venting, flashing, drip edge and fascia (remove any skylights during roof repair or replacement).</p> <p>3.03 – Full roof replacement with Class A asphalt shingles, underlayment, with ember-resistant venting, flashing, drip edge and fascia (remove any skylights during roof repair or replacement).</p> <p>3.04 – Replace combustible door(s) and/or window(s) with fire rated compliant alternatives that would meet the requirements of currently adopted codes. Replace windows with dual pane tempered glass windows (with the tempered glass pane installed to face the inside of the structure) meeting California Building Code standards, ideally replace with dual pane windows with both panes being tempered glass (with visible corner etching on both). Replace combustible doors with noncombustible material or solid-core wood at least 1 ¾ inches thick, with a noncombustible threshold. If the door includes glass, provide two panes of tempered glass. Alternatively, a noncombustible storm door can be installed over the existing door.</p> <p>3.05 – Replace or Repair damaged siding and/or trim with ignition resistant siding and trim.</p> <p>3.06 – Replace combustible garage door(s) if mitigation is not possible.</p> <p>3.07 * – Elevate electrical enclosures, junction boxes, panels, outlets, and switches above the flood line.</p> <p>3.08 * – Install ground fault circuit interrupters (GFCIs) in areas prone to water exposure. If not possible, make enclosures, wire and junctions rated for water submersion.</p> <p>3.09 * – Install a separate electrical main shut-off switch outside of main electrical panel.</p> <p>3.10 * – Provide backflow preventer on main water line.</p> <p>3.11 * – Install check valve on sewer line.</p> <p>3.12 * – Include rainwater harvesting tank or barrels.</p>

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	3.13 – Remove or move any sheds or outbuildings that cannot be mitigated with ignition resistant material (complying with current Building Code standards) to be at least 30' away from primary structures.
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### Demonstrable Hardship

HUD requires HCD to define “demonstrable hardship” and any related exceptions to program policies for applicants who demonstrate undue hardship. A demonstrable hardship is defined as a substantial change in a household’s situation that prohibits or severely affects their ability to provide and maintain a minimal standard of living or basic necessities, such as food, housing, clothing and transportation, causing economic distress well beyond mere inconvenience. A demonstrable hardship must occur after the flood and must be documented with objective evidence.

The demonstrable hardship must be of a severe, involuntary and unexpected nature, and not generally for the same reasons shared with other households affected by the disaster. Examples of demonstrable hardship may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and excessive amount of debt due to a natural disaster, etc. However, there is no one event that automatically defines a demonstrable hardship.

Subrecipients will consider each applicant’s overall situation if a demonstrable hardship is claimed, and documentation can be provided showing the cause and other factors relevant to the issue of demonstrable hardship.

- **Program Estimated Begin and End Dates**

The OOM Program is expected to commence following HUD’s approval of the Action Plan and execution of the grant agreement between HCD and HUD, with applications opening to Program participants in the spring/summer of 2026 and remain operational through the end of the grant term or the exhaustion of funds, whichever comes first.

- **Other Program Details**

HCD will provide technical assistance to its subrecipient including program policies and procedures that will outline the requirements of the program and rules for specific projects, including general eligibility, specific eligible and ineligible costs, and the criteria for evaluating applications and approving projects.

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**Priority Population**

The Program will prioritize households earning at or below 80 percent AMI (LMI Households). If funding remains after all eligible LMI households are served, the Program will serve households earning up to 120 percent AMI. Additionally, the Program may prioritize one or two neighborhoods that are already engaged with the Ventura County Fire Department and/or the Ventura Regional Fire Safe Council, a local home hardening program, where mitigation needs still exist to achieve community-wide resiliency.

**Program Competitive Application Overview**

Not Applicable.

- **Program Method of Distribution Description/Delivery**

HCD will distribute grant funds to beneficiaries through its subrecipient, Ventura County, to administer the Program. HCD will enter into a subrecipient agreement with Ventura County to manage the CDBG-DR funds and the Program.

HCD will leverage internal resources, bring on staff to increase capacity and expertise, and procure a consultant to provide technical assistance, maintaining the responsibility of overseeing the program and compliance of individual projects. The Subrecipient will be responsible for outreach, implementation, and oversight of approved projects, with regular monitoring by the state.

- **How Mitigation Set-Aside Activities Will Meet Definition of Mitigation?**

The OOM Program meets the definition of Mitigation by incorporating the Levels of Importance above in determining fire and flood retrofits for each eligible home. The Levels of Importance criteria was designed in coordination with state and local CalFIRE departments and best practices for flood mitigation.

- **How Mitigation Set-Aside Activities will Address Current and Future Risks?**

The OOM Program addresses the ubiquitous fire and flood hazards in Ventura County in two significant ways: On the individual property level, the program helps homeowners mitigate risk on their parcels by providing home hardening and flood mitigation retrofits for eligible owner-occupied structures. On the local jurisdiction level, the program supports community-wide hazard mitigation by prioritizing communities already engaged with local home hardening programs, where mitigation needs still exist.



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**Projection of Expenditures and Outcomes**

**See Appendix B for HCD's 2023 Projections and Outcomes for the OOM program.**

**Mitigation Resilient Infrastructure Program**

<b>Grant Type</b>	<b>Grant Number</b>	<b>Proposed Budget</b>	<b>Proposed HUD-Identified MID Budget</b>	<b>Proposed Grantee-Identified MID Budget</b>
<b>Parent</b>	<b>8-23-DG-06-0001</b>	<b>\$19,259,058.25</b>	<b>\$19,259,058.25</b>	<b>\$0.00</b>

**Narratives**

- **Program Description**

This program provides local jurisdictions with an expansive and hands-on role in driving local community infrastructure needs that meet the definition of mitigation. The Mitigation Resilient Infrastructure Program (MIT-RIP) will assist local jurisdictions in addressing mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the Mitigation Needs Assessment. Projects 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. Ultimately, the program accomplishment will be the funding of mitigation projects that will allow for more resilient infrastructure against future disasters.

The Funding is available to eligible jurisdictions and eligible entities via direct awards as established by an allocation methodology that averages percent LMI, the percent of area of the county that includes 100-year or 500-year flood zones, and the percent of total acres of moderate, high, and very high fire hazard areas. Each composite average was applied towards the total set-aside allocation to determine direct awards. Upon action plan amendment approval of these direct allocations, applicants will be able to submit eligible projects towards their allocations until all funds are obligated. HCD will review projects for the use of funds and provide technical assistance and oversight to ensure that local governments and eligible entities are receiving funds to execute their infrastructure recovery effectively. All funded projects will be reviewed for compliance with CDBG requirements, and if compliant, approved by HCD before

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funds are provided to subrecipients. Eligible project types will include Standalone or federal match.

- **How will Program Meet Definition of Mitigation**

The Mitigation Resilient Infrastructure Program will fund projects that increase resilience to future disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property and suffering and hardship. The Program will 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. All submitted projects will be reviewed and technical assistance will be provided by HCD to ensure projects meet program requirements and include relevant mitigation measures.

- **How will Program Address Current and Future Risks/Mitigation Needs Assessment**

HCD will incorporate mitigation measures into activities by meeting required building code, hazard mitigation plans, and other resiliency plans, which incorporates enhanced mitigation measures. Furthermore, the program is aligned to meet policy goals and objectives as defined in the most recent State Hazard Mitigation Plan (SHMP) and the respective counties' Local Hazard Mitigation Plans (LHMP) that center on mitigating for present and future floods.

- **Program Tieback to Disaster/Unmet Needs**

The Universal Notice defines mitigation activities as those that increase resilience to future disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property and suffering and hardship. The universal notice sets forth the requirement for HCD to use 15 percent of the total allocation to fund mitigation activities and inform these programs via the mitigation needs assessment that clearly illustrates the connections between impacts of the current and future hazards, mitigation needs, and proposed mitigation activities. Projects that meet the definition of mitigation and also have a tie-back to the qualifying disasters will also be eligible under this program.

- **Program National Objective(s)**

In accordance with 24 CFR 570.208 and Section 104(b)(3) of the Housing and Community Development Act (HCDA), all CDBG-DR mitigation set aside funded activities must satisfy a national objective. All activities will meet either the Urgent Need, or low- and moderate-income National Objective.

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- **Program Eligibility**

Local jurisdiction and entity in MID counties are eligible for these funds.

The use of the mitigation set-aside must ensure that proposed activities are CDBG eligible under title I of the Housing and Community Development Act, or otherwise eligible pursuant to a waiver of alternative requirement in the FRN:

HCDA Section 105(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvement (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).

Through the FRN, 87 FR 6370, HUD adopts alternative requirements to activities eligible under the Housing and Community Development Act (HCDA) Section 105(a) which allows California to carry out modified activities to comply with the requirements in the FRN to incorporate mitigation measures as a construction standard.

HCD will work with each local jurisdiction and entity to finalize a scope of work for remining needs identified to determine which meet HUD's definition of mitigation. This scope of work and other regulatory requirements will be captured in a subrecipient agreement with HCD and local jurisdiction and entity.

- **Program Responsible Entity**

The California Department of Housing and Community Development (HCD) is the lead and responsible agency for administering these CDBG-DR funds. HCD will distribute grant funding using a subrecipient administered approach. Thus, subrecipients will assume the authority for the decision making and completion of the environmental review per 24 CFR 58.4. As a result, HCD will provide technical assistance and monitor subrecipients to ensure they exercise HUDs environmental review responsibilities and follow the requirements per 24 CFR 58.4(b)(2) and 24 CFR 58.18.

- **Program Maximum Assistance**

There will be no project-based award cap for MIT-RIP. Eligible applicants may apply their direct award towards one or more projects up to their award amount. Please see the Funding Allocation table with total allocations.

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- **Program Estimated Begin and End Dates**

The Mitigation Resilient Infrastructure Program is expected to commence following HUD's approval of the Action Plan and execution of the grant agreement between HCD and HUD and remain operational through the end of the grant term or the exhaustion of funds.

- **Other Program Details**

Not applicable

- **Program Competitive Application Overview**

Not applicable.

- **Program Method of Distribution Description/Overview**

HCD will provide oversight for the Mitigation Resilient Infrastructure Program. Local jurisdictions or entities will be responsible for implementing project in accordance FRN requirements that meet the definition of mitigation.

Local jurisdictions or entities in MID counties are eligible for these funds. Using the 2018 CNA study, data provided by jurisdictions, HCD allocated funds to each county based on remaining proportional needs identified for capital improvements. HCD will work with each local jurisdiction or entity to finalize a scope of work for remaining capital needs identified to determine which meet HUD's definition of mitigation. This scope of work and other regulatory requirements will be captured in a subrecipient agreement with HCD and local jurisdiction or entity. In APA 1, the table was updated to adjust the regional allocations for each subrecipient to account for activity delivery costs for program implementation.

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**Funding Allocation**

<b>County</b>	<b>Jurisdiction or Entity</b>	<b>Allocation</b>	<b>Percent of Total Need</b>
<b>Santa Cruz</b>	Buena Vista Center, Santa Cruz County	\$5,968,017.87	31%
<b>Merced</b>	Merced Center, Felix Torres Center, Atwater Center, Rafael Silva Center	\$5,551,000.00	29%
<b>San Joaquin</b>	Artesi II Center, Artesi III Center, Harney Lane Center	\$5,201,000.00	27%
<b>San Luis Obispo</b>	San Luis Obispo County	\$2,539,040.38	13%
<b>Total</b>		\$19,259,058.25	100%

**Projection of Expenditures**

APA 1 – Added projections for the MHRE and DR-ACCEL programs approved by HUD during the initial submittal of the Public Action Plan and add projections for the MIT-RIP program. The Expenditure Projections will be included in the policies and procedures.

**5. Appendix**

**a. Certifications.**

**b. Waivers.**

To date, HCD has not requested any additional waivers outside of the general waivers HUD included in FRN governing the 2023 allocation, 88 FR 82982.

**c. Summary and Response of Public Comments.**

**Public Hearing and Comments for the 2023 CDBG-DR Original Action Plan**

HCD conducted public hearings during the 2023 Action Plan public comment period to ensure robust participation, following the Citizen Participation Plan. HCD facilitated both local and virtual public comment meetings in English and Spanish. The public meetings were announced at the start of the public comment period on February 28, 2024, to all

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the stakeholders, as stated in our outreach plan according to HUD and HCD standards. The draft Action Plan was available for public review and comment for 30 days from February 28, 2024 through 5:00 p.m. Pacific Standard Time on March 28, 2024. Comments were allowed to be submitted electronically, postal mail, and during the public meetings.

A contact person's name was included for reasonable accommodation, translation services, and any other questions. Registration instructions for the meetings was included in the announcements. All meeting notices included a contact to request reasonable accommodation for the public meetings to ensure equal access for persons with disabilities. The public hearings were held virtually and allowed for questions and answer in real time between public meeting participants and HCD staff.

The Action Plan and PDFs of the public comment meeting presentation slides was posted on HCD's Disaster Recovery web page, under 2023 Disasters: [Action Plans and Federal Register Notices \(FRNs\) | California Department of Housing and Community Development](#)

### **Public Meeting Schedule**

There was a total of three local and two virtual meetings held. Both local and virtual meetings were held in English and Spanish for LEP assistance.

### **In-person General Public Meeting in English and Spanish:**

- San Joaquin County on March 12, 2024, 6-8pm at Grape Festival Grounds (Jackson Hall), 413 E. Lockeford St, Lodi, CA 95240
  - 34 Attendees
- Merced County on March 13, 2024, 6-8pm at Merced County Board Chamber, 3rd Floor, 2222 M Street, Merced, CA 95340
  - 52 Attendees
- San Luis Obispo County on March 14, 2024, 6-8pm at Morro Bay Veteran's Memorial Building, 209 Surf Street, Morro Bay, CA 93442
  - 13 Attendees

### **Virtual General Public Meeting**

- March 20, 6pm-8pm in English – 27 Attendees
- March 21, 6pm-8pm in Spanish – 7 Attendees

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**Public Comment and Questions**

These are the summary of public comments and questions received for the 2023 CDBG-DR Action Plan during the public comment period beginning February 28, 2024, through March 28, 2024. All Comments were considered that were received during the meeting and emailed to HCD's disaster recovery email point. The questions and public comments are transcribed below for each meeting and answers from HCD and county staff. HCD will make public comments available to citizens, public agencies, and other interested parties upon request and post it to the HCD website

The following transcript is from the local public hearing held in San Joaquin County on March 12, 2024. Questions and comments are from meeting participants and answers are from HCD and County staff.

**Public Comment Question:** My main concern is around the Culvert being blocked in east side. Are you guys getting those cleaned? Do you know who I would contact?

**HCD Response:** The CDBG-DR Program does not work around Culvert's. The programs that are proposed today, Manufactured Home Replacement and Elevation, Multifamily housing and Mitigation programs.

**County Response:** Contact for Culvert issues is San Joaquin Public Works Department. Phone number was provided by the county staff.

**Public Comment:** Our neighborhood floods because of the infrastructure. Even if the manufactured homes are elevated the area will still flood due to the poor infrastructure.

**HCD Response:** Unfortunately, this money is specifically for housing recovery and will not cover the larger infrastructure issue that causes flooding.

**Public Comment:** Number came from FEMA? Money cover repairs on homes still needed that FEMA did not cover? Elevation only for replacement of home?

**HCD Response:** Program is required to first show tie-back to DR-4683. Where rehabilitation cost will be higher than cost to replace is prioritized. These homes will have new elevation.

**Public Comment:** Is income status a factor to be eligible for program?

**HCD Response:** Yes, these programs are eligible to LMI household/renters.

**Public Comment:** Is there duplication of benefits?

**HCD Response:** Yes. We must account for all dollars received for housing needs. All the assistance received (receipts) must be presented at time of applying for CDBG-DR.

**Public Comment:** What if I haven't spent disaster recovery money?

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**HCD Response:** Bring it to the application process and DOB will be assessed for eligibility to housing program.

**Public Comment:** Does an applicant need to apply to FEMA first to be eligible for CDBG DR?

**HCD Response:** No, but the applicant still needs to show documentation of tie back to DR-4683.

The following transcript is from the local public hearing held in Spanish in San Joaquin County on March 12, 2024. Questions are from meeting participants and answers are from HCD staff.

**Public Comment:** I live in a mobile home and my air conditioner was destroyed by the storms, could you replace my air conditioner.

**HCD Response:** We can replace your mobile home but not just your air conditioner.

**Public Comment:** Could I receive assistance to purchase a new car?

**HCD Response:** These funds are for reconstructing mobile homes and multifamily homes, not purchasing a new car.

**Public Comment:** Will you have more meetings like this?

**HCD Response:** Yes, we will have more meetings. I am not sure when we will but if you sign up for the email list on HCD's website you can receive notifications about this program.

**Public Comment:** The storm destroyed the items in my garage, could you replace those items?

**HCD Response:** No, we cannot replace the items in your garage.

**Public Comment:** If I receive these funds, will I be tied down to anything if I try and sell my house?

**HCD Response:** What type of house do you have?

**Public Comment:** I have a multifamily home.

**HCD Response:** Do you have renters?

**Public Comment:** Yes, I do.

**HCD Response:** If you accept these funds, your multifamily home may become affordable housing. This funding is also not available for rehabilitation of multifamily home.



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The following transcript is from the local public hearing held in Merced County on March 13th, 2024. Questions and comments are from meeting participants and answers are from HCD staff.

**Public Comment Question:** Where did you get the data for the mobilehomes damaged? Did the data say 5 or 11 damaged for Merced.

**HCD Response:** The data for the mobilehomes damaged were collected from the county and disaster case managers. The data for Merced County is broken down by what was given to us by the County and Habitat for Humanity. If you add all 3 data sources, the total was 126 MH Units destroyed or damaged in Merced County.

**Public Comment:** The website will announce the programs that be available on the county website.

**HCD Response:** We will work with our local partners to announce the launch of the programs. We do not want to confuse recipients that this is a state-run program and not a local run program.

**Public Comment:** The Accelerator award for the CDBG Funds, is it going to be like only tax credits projects that have yet to receive tax credits. What is that limiting pool for eligible awards? We have a Homekey project that we submitted.

**HCD Response:** This is for any projects that has secured at least one award from HCD. If you have secured that award, we will send a letter notifying of the available funds. If you can get to construction fastest, we will award you the funds. It is not tied to tax credit but to getting to construction as soon as possible. Yes, that is correct.

**Follow-up Question:** So, someone received small infill grant, they can apply for this to accelerate construction of the project?

**HCD Response:** Yes. For the those not familiar with affordable housing, you get multiple awards for construction of housing.

**Public Comment:** Can you go back to the Income Limit slides?

**HCD Response:** We have a hand-out for the Income limits on CDBG-DR for 2023. Staff gave the income limit hand-outs.

**Public Comment:** The slide showed some funding given to Rural Camps taking on evacuees. The Hamptons took some evacuees on their own and dropped prices to 50%, since people were not comfortable going to shelters for privacy issues. Will they be considered in given some funding just as rural centers have?

**HCD Response:** Unfortunately, the answer is No. We recognize there are a lot of recovery needs, but the \$115 million will not be able to make all the recovery needs addressed. Private entities are encouraged to apply for Small Business Administration

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(SBA) loans.

**Public Comment:** I live in a mobilehome park. How should I apply for the reconstruction?

**HCD Response:** Application will open up after HUD approves this Action Plan authorizing the program. The program is projected to start sometime in early 2025. This \$115 million is not in HCD's bank account. We have to follow these steps to get the action plan approved before we can start the programs.

**Public Comment:** We received some FEMA money, some things got fixed and some did not. Habitat for Humanity came and did the assessment and asked for the information. Will that be enough or do we have to submit document again.

**HCD Response:** If you received any FEMA, SBA, Insurance settlements, we must account for that first before you can get the CDBG DR funding. Receipts that show assistance money went for housing e.g., hotels, rental etc. You do not have to have a FEMA IA registration or FEMA award to apply for the MHRE program.

**Public Comment:** If FEMA did not give you enough money and someone else provided funds for you to fix the unit, do you still need receipts?

**HCD Response:** Yes, you do. We recognize that is a tough issue. HCD does not have the authority to waive the duplication of benefit (DOB) requirements.

**Public Comment:** My son bought the material; can he make a written receipt?

**HCD Response:** We require an official receipt for DOB requirements.

**Public Comment:** Habitat for Humanity came and did the inspection and took some pictures. Can they use those pictures or shall I take pictures again? They did it two months ago, would they have the pictures.

**HCD Response:** Yes, we need to have a tie-back to the DR 4683. We need documentation and proof that the unit was damaged from the floods and not there before. We cannot answer for Habitat for Humanity but you can check with them.

**Public Comment:** DR 4683, what was the incident of the flood?

**HCD Response:** The floods from January of 2023. There were 2 disasters in 2023, this has to be the one in January not the March floods.

**Public Comment:** I applied with FEMA but was not eligible. I fixed my home using my own funds and do not have the receipts.

**HCD Response:** If you were denied by FEMA, you would likely not be eligible for CDBG DR either because this is a federal funding. If you have no receipts, we are not able to assist you.

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**Public Comment:** Is Habitat for Humanity dispersing any money or is it being dispersed through HCD? Will Habitat for Humanity provide workers to keep cost down?

**HCD Response:** We will work with the county to identify a local partner to implement this program. No, we have not a identified local partner yet.

We know this is a complicated program, it is important for us to tell you what is eligible and what is not eligible.

**Public Comment:** Since the Action Plan is slated to be approved in June of 2024, is there an estimated timeline for when the approved funds will be received?

**HCD Response:** The anticipated grant agreement is when we will have access to these dollars, then programs will be implemented. The timeline will also be dependent local partners ability to get the applications going.

**Public Comment:** For the Infrastructure funding, if we expect the funding to be utilized for future floods?

**HCD Response:** No, we have to use data to show HUD how the funding is allocated. If you look at the methodology on the presentation slide for unmet needs, housing needs is by far the largest need. We have allocated funding for housing needs.

**Public Comment:** If we were to utilize the Community Action Agency to do the work and they would get the funding in return or is there other funding?

**HCD Response:** Correct, if the Community Action Agency would be the place people applied and they did the installation work and they send us the paperwork, then we would repay them.

When we get to the program implementation in 2025, the program will have an outreach equal to this, explaining the process of program application and delivery.

**Public Comment:** The mobilehome park was impacted, FEMA went in to review the damage, we received assistance from FEMA. Lot of people during disasters took advantage who were looking for opportunity. Hispanic communities, in general, try to save money. An example, if they allowed us \$5,000 to fix skirt of the mobilehome, construction guy asked how much money FEMA gave and the construction guy asked for that amount to fix the skirt. But if we went with a family member who knew construction, they would have charged us \$3,000, we could save money for other repairs or for potential future needs. We understand there are rules and it is upsetting for us. I feel that they are closing the doors on us and on the assistance that they can potentially receive.

**HCD Response:** We fully understand, and every household has to make the decision that is best for them and their recovery efforts. This federal requirement is something we cannot waive. It is built into the process to try to limit unscrupulous actors and constructors that come in and try to take advantage of folks.

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**Public Comment:** If she received \$5,000 and there are more damages to fix, can she apply? Will it be DOB?

**HCD Response:** Yes, if there are receipts that were used for housing purposes, if there are other needs, then no. If there are no receipts, the award would be reduced by that \$5,000 from the FEMA award.

**Public Comment:** Does estimate suffice?

**HCD Response:** Estimates are not allowed; we are talking about receipts for work done.

**Public Comment:** FEMA assisted with only \$270, I had more damages in laundry area, flooring, etc., and got another \$300. I had to figure out if to fix the house or use funds for emergency needs. Power was out during that time; people used that money to buy food. I do not have receipts and my house is not fixed.

**HCD Response:** Maybe potentially eligible to apply, would need to bring receipts for housing repairs.

**Public Comment:** When I purchase the home, the realtor said I was not in the flood area so insurance was not bought for floods. After being declined by FEMA, I spent \$67 for faxes for receipts, FEMA sent her letter stating for me to pay for flood insurance. The rent is also going up with no justification. Now she received the letter that she is in the flood zone but before the flood, she was not in the flood zone.

**HCD Response:** We cannot speak for FEMA and the requirements. For the program eligibility, you need to show some documentation from the January floods, we can use that as a tie-back to DR 4683. If you are getting the CDBG DR award, you will be required to get National Flood Insurance Policy. If you don't get the insurance, you will not be able to apply for future CDBG DR funding. HCD cannot comment on the flood insurance and rent increases.

We recognize that rent is increasing and the housing need for renters. Our goal is to build restricted affordable rental units, with the goal of these new units bringing rents down eventually.

**Public Comment:** You said if we qualify for this program, we need to get flood insurance. I called before to try to get flood insurance. I was told that MH units cannot have flood insurance unless they are high for damage.

**HCD Response:** Our program includes the purchase of the unit, installation, and elevation. We recognize resiliency from future floods, so we have to do an elevation of 2 to 3 feet. This requirement is from the State Department of Water Resources which does flood management. You are not required to stay in the same park, you can move to a different park, as long as it is in the county. We also recognize the factors as to

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where people live due to finances, schools, jobs, family, and other choices. dents the same opportunity as affluent survivors to move or stay at the same place.

**Public Comment:** We had 2 separate individuals come in to take estimates after the disaster. The 2<sup>nd</sup> individuals did not know who the first were. FEMA never came. How do I know who they were?

**HCD Response:** We cannot answer for or have authority for those early stages of inspection. The key eligibility is that your MH Unit was damaged by the January 2023 floods. Part of the application will be doing the scope of work; you will be working with folks within our program.

Our recommendation is to talk to disaster case managers, working for Catholic Charities, who are in the area and have access to programs beyond HCD.

**Public Comment:** To clarify, will there be some inspection done for this funding?

**HCD Response:** Yes, once you apply, you will need to show connection to the January flood and go through the program requirements.

**Public Comment:** Is application for first come, first serve? Are they prioritizing replacement of MH Units?

**HCD Response:** We are prioritizing those people need a full replacement of their mobilehomes or MH Units. With the amount of money divided in 5 counties, we do not believe there will be money left for small repairs. Yes, if the cost of the repair is more than buying a new unit, we buy a new unit.

**Public Comment:** To clarify, to get future funding, we have to apply for flood insurance?

**HCD Response:** If you get awarded the CDBG DR funds, you have to get flood insurance for any future disasters.

**Public Comment:** There are non-profit organizations in the room who help in Planada, and we are also here in Merced. We would like to help in Merced. You can register with us and Catholic Charities. We do your case management.

**Public Comment:** I have an estimate of certain things that did not get covered for FEMA money, can I still use that estimate for this program?

**HCD Response:** I encourage you to apply when the program comes out and the inspector will come and do the cost estimate, we will do the DOB analysis, and it will spell out the awards and you have a choice to accept or decline that award.

**Public Comment:** If I get a new MH unit, will I get the title apart from the requirement for flood insurance

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**HCD Response:** The requirement is that this is your primary home, you stay in the home for 2 years, if you move before 2 years, you might pay a portion back. This is a free federal grant with no repayment.

**Public Comment:** Habitat took pictures, how do I know they have everything on file?

**DCM Response:** If anyone needs to be connected to Habitat for Humanity, the DCM associate can give them the contact information. Dial 2-1-1 for contact information for DCM and United Way.

**HCD Response:** We appreciate the partnership with Catholic Charities and United Way.

**Public Comment:** From now to then, what are the next steps?

**HCD Response:** We will wait for HUD to approve the action plan, execute grant agreement and then start program implementation.

**Public Comment:** If they are still building, can they keep receipts? Do we have to register to get this funding?

**HCD Response:** We are at the stage where we are proposing this program. We will have outreach and community forms etc. once the program is launched.

**Public Comment:** What were the 5 counties?

**HCD Response:** Merced, San Joaquin, Santa Cruz, San Luis Obispo, Ventura.

**Public Comment:** If we do not have pictures but we have videos, can they be used?

**HCD Response:** Yes.

**Public comment:** FEMA denied my claim, 60 days for appeal letter, are there any resources available for proper appeal letter?

**HCD Response:** Yes, DCM can assist with that. They are in the room.

**Public Comment:** I am renting the MH space, should the landlord have flood insurance? If someone falls in my home, shall I have insurance for that?

**HCD Response:** We do not know that.

Please sign up for HCD emails to be notified about the program announcements.

The following transcript is from the local public hearing held in San Luis Obispo County on March 14, 2024. Questions and comments are from meeting participants and answers are from HCD staff.

**Public Comment:** Is the word "mitigation" flexible? Does it apply to the rural centers and expand on definition of infrastructure?

**HCD Response:** Building upgrades. Rural Service Centers need updating to physical

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infrastructure. Improving to these structures to be used year-round and to be used as temporary shelters. HUD definition for mitigation means project that quantifies improvement to seven FEM lifelines. HCD definition hinges on improved housing for seasonal farmers and temporary shelter for disaster housing. The infrastructure is in support of making the structure habitual.

**Public Comment:** How is resilience defined? Not rebuilding in flood plains and how mobile homeowners that do live in floodplains and how they will be moved? Expand on this?

**HCD Response:** Mitigation is two folds. First is 2 to 3 feet above base flood elevation based on DWR is a 500-year flood protection. Second, primary home impacted but don't have to stay in same park but can move to another park in the county that is more appropriate for you and your family. Want to provide LMI households opportunity to move to another mobile home park in San Luis Obispo County. Tie-back provision is emphasized so all work in the plan must tie back to disaster. For mobile home some documentation of impact specific to DR-4683. Don't have to have FEMA but some documentation.

**Public Comment:** How is this disaster being collected? Is this really all of the data? Seems a lot was not reported.

**HCD Response:** Based on FEMA data set there is low/negative count. We supplemented with DCMP and collected data to show there are still households that are in que and need assistance. mobilehome data was across multiple sources. Rental properties are part of data and why we looked at landlord data. Landlords going to banks to get loans to repair property then rents increase to recoup cost. Which is why money is going towards building new rental homes across counties.

**Public Comment:** Do you feel like the recipient of this assistance are aware of it?

**HCD Response:** We are at stage to get program proposal. Once approved then we will get outreach to all impacted areas and push information out through FEMA contacts. At this stage it is to present what is coming. This is partly HUD design for money to come in after all primary resources have been exhausted. This is fastest move for CDBG DR money.

### **Virtual Public Hearing**

The following transcript is from the virtual public hearing held on March 20, 2024, as the required public hearing for the 2023 CDBG-DR Action Plan. Questions are from meeting participants and answers are from HCD staff.

**Public Comment:** Referring to the table for the type of damages as first floors and others. Simply curious what the other categories were, it is 14 percent and what is the other?

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**HCD Response:** This data comes from FEMA and based on their verified inspection, and we are not completely sure what is all others mean, this is our first CDBG-DR Grant in response to the flood category we will check with FEMA and provide a response when we do the responses for all comments. Additional responses to 14percent of other water damage: According to the FEMA Policy - Other represents any area outside of the home (in the yard, a shed, or secondary structures, etc.) that is not considered to be essential living space. Data used from this table focused on housing not the other.

**Public Comment:** When FEMA does an inspection, do they look into the sanitation infrastructure of the home, or is that kind of carved out in the grant at all?

**HCD Response:** We are not aware of all the details of what the FEMA does as part of inspections, we can look and get back to you. But it is about the CDBG-DR grant, and we rely on the FEMA data and other data. But as you saw in the presentation FEMA data is not inclusive of the population that we want to focus on, which are renters, and farmworkers, and does kind off susceptible populations. So, we have and apply data from Disaster Case Managers, Local Government Partners, and Non-Profits as well. Additional response to the FEMA inspections: Yes, according to the FEMA Preliminary Damage Assessment Guide, sanitation is included in the Inspections and is considered as Habitability. FEMA defines “habitable” as safe, sanitary, and functional.

**Public Comment:** When determining the location of a project, are we focused on simply the mailing/legal address or which Housing Authority that project reports to? For example, a project is in San Benito County, not listed in the DR-4683 as MID County but does report to the Santa Cruz Housing Authority which is listed in DR-4683 MID County. Would this type of project would be eligible for DR-4683 funding?

**HCD Response:** The answer to that is No. The driver of this funding is the location of the Project, and has to be within does eligible Counties, so since the San Benito is not an eligible county this would not be an eligible project.

**Public Comment:** Can you provide some examples of housing projects that are tied back to the disaster?

**HCD Response:** Two programs have tied back to the disaster: Manufactured Home Replacement and Elevation Program (MHRE), the tie back is that mobile home or manufactured home unit must have been damaged as part of DR-4683. That has to be documentation provided that makes it connected to DR-4683, that could be FEMA registration, but you don’t have to be registered for FEMA assistance. In the Multi-Family Program, Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL) the tie back to the disaster is based on he footprints of the DR-4683 floods, without being in the floodplain itself. So, the tiebacks to the disaster are a direct tie-back for the manufactured homes and an indirect tie-back for the rental properties.



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**Public Comment:** Based on other emergencies how would flood work differently for farmers housing mobile homes?

**HCD Response:** Not truly clear about this question, but we defined in the programs we are implementing these funds in each program one of the programs we are using \$15 million for farmworker housing, and it is the Rural Resiliency Center Program. The second program is defined as the Manufactured Home Replacement and Elevation Program (MHRE) to provide full replacement of the mobile homes or manufactured homes, and the third is the Multifamily Rental Program.

**Public Comment:** You talked about prioritizing HCD Loans, can you describe it in more detail, is there technical assistance for that?

**HCD Response:** Currently a typical Multifamily Affordable Rental Project has four to five different layers of funding in order to get to construction. In our Disaster Recovery Multifamily Housing Accelerator Program (DR-ACCEL) we are looking for a project that already secured one of the fundings from HCD, they might have funding at the local level, but they have some sort of a gap, they are maybe applying for the other source of affordable housing funds. We are going to reach out to the list of projects that secured HCD loans. HCD will notify them about the availability of the CDBG-DR program and ask them to write an application to say what exactly their gap is and demonstrate the readiness to use these funds to get to the construction. This must be a project that can incorporate Federal Funding and meet environmental, labor, and other requirements that come with Federal funding. We recognized not all the projects may do that. The following transcript is from the virtual public hearing held in Spanish on March 21, 2024. Questions are from meeting participants and answers are from HCD staff.

**Public Comment Question:** Hi, I am not sure about the dates of the storms you are talking about.

**HCD Response:** I am referring to the months of December 2022 and January 2023.

### **Written Public Comments**

The following questions were received via Electronic Mail (email) by HCD staff during the required 30-day public comment period for the 2023 Action Plan.

**a. Public Comment Email Received from Mariposa County Official on  
February 29, 2024**

Hi CDBG Disaster Recovery Unit,

I recently received your announcement about disaster recovery funds that are becoming available for DR-4683. I wanted to confirm that Mariposa County is eligible since it wasn't mentioned in the announcement (there were other counties mentioned specifically). We were part of the DR-4683 disaster declaration.

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We have a flood mitigation project, which we've already created a project scope and budget for, that we would love to target for this funding. I wanted to confirm our eligibility before attending the webinar.

**HCD Response:**

Thank you for your inquiry. Mariposa County was part of **Public Assistance** for California's 2023 [FEMA DR 4683](#). The CDBG-DR funding is allocated for **Individual Assistance (IA)** and the [Federal Register Notice](#) released on 11/27/23 identified only 5 counties under the FEMA IA.

Unfortunately, Mariposa County was not part of the FEMA IA and is not eligible for the 2023 CDBG DR Funding. However, there may be other federal or state programs available for your project. Thank you.

**b. Public Comment Email Received from State Water Resources on March 7, 2024**

I am an engineer and emergency management coordinator for the State Water Resources Control Board, a regulatory agency within the California Environmental Protection Agency (CalEPA). Under the agency's various Emergency Service Functions, my team supported the State Operations Center during the 2022-2023 Winter Storms, and we continue to support FEMA with permit-inquiries related to DR-4683 Public Assistance projects. I serve as the agency Lead for wastewater critical infrastructure coordination and extreme weather event change strategic planning, with a current focus on flood/storm emergency management operations.

I recently became aware of the Community Development Block Grant–Disaster Recovery plan. I look forward to learning more about plans to support flood-impacted areas in Merced, Santa Cruz, San Luis Obispo, San Joaquin, and Ventura during the public meeting on March 20<sup>th</sup>. Will any major talking points or details related to wastewater utilities/management be discussed? Also, is there a preferred mechanism for state-agency coordination on this plan and subsequent efforts? Thank you for the time and attention.

**HCD Response:**

We have posted the [draft 2023 CDBG-DR Action Plan](#) on HCD's website (under CDBG-DR Action Plan for 2023 Disasters). Unfortunately, with limited allocation amount, there are no programs for wastewater utilities project, but HCD will discuss the proposed CDBG-DR housing and mitigation programs in the following public meeting webinars:

- **Public webinar (English)** – March 20, 2024, 6:00 pm-7:30 pm

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- Register for the public webinar: <https://hcd-ca-gov.zoom.us/j/81hZTq-43> [hcd-ca-gov.zoom.us]
- **Public webinar (Spanish)** – March 21, 2024, 6:00 pm-7:30 pm
  - Register for the public webinar: <https://hcd-ca-gov.zoom.us/j/9UKq4dwa> [hcd-ca-gov.zoom.us]

For more information, please visit our [Disaster Recovery & Mitigation | California Department of Housing and Community Development](#). Please let us know if you need any other information.

**c. Public Comment Email Received from San Luis Obispo resident March 8, 2024**

I am interesting in attending the meeting held in San Luis Obispo but cannot physically attend. Will the meeting be recorded/posted after. What I am really interested in is the proposed CDBG-DR housing and mitigation programs, and the budget and funding timeline. Let me know what is available. Thank you.

**HCD Response:**

HCD will discuss the proposed CDBG-DR housing and mitigation programs in the following public meeting webinars:

- **Public webinar (English)** – March 20, 2024, 6:00 pm-7:30 pm
  - Register for the public webinar: <https://hcd-ca-gov.zoom.us/j/81hZTq-43> [hcd-ca-gov.zoom.us]
- **Public webinar (Spanish)** – March 21, 2024, 6:00 pm-7:30 pm
  - Register for the public webinar: <https://hcd-ca-gov.zoom.us/j/9UKq4dwa> [hcd-ca-gov.zoom.us]

The **draft 2023 CDBG-DR Action Plan** on HCD's website (under CDBG-DR Action Plan for 2023 Disasters). For more information, please visit our [Disaster Recovery & Mitigation | California Department of Housing and Community Development](#). Please let us know if you need any other information.

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**d. Public Comment Email Received from Morro County resident March 20, 2024**

I have registered for the above Zoom Meeting but due to extenuating circumstances That have come to be, I cannot attend the meeting at this time.

How can I get the necessary information regarding this event since I had considerable property damage due to the 2023 Winter Storms.

I received no assistance from FEMA or other agencies for the loss of property due to erosion as it was related to the flooding to my property caused by the Morro Creek in Morro Bay, CA.

Can you provide me with a telephone number so I can clarify what the above meeting was about and what your involvement is.

I would appreciate your assistance as a homeowner since I have received little to none from the San Luis Obispo County.

**HCD Response:**

We are sorry to hear that you were not able to attend the virtual meeting for the 2023 CDBG DR Action Plan.

The meeting was for the January 2023 winter storms, flooding, landslides, and mudslides (DR-4683). The State of California received \$115,022,000 of CDBG-DR funds to address disaster impacts and mitigate future disasters. HCD discussed the proposed CDBG-DR housing and mitigation programs, and the budget and funding timeline in the public meeting.

The [draft 2023 CDBG-DR Action Plan](#) on HCD's website (under CDBG-DR Action Plan for 2023 Disasters). We will post the presentation on the same link under the 2023 Disasters.

Please note that the programs will not be implemented until next year.

For more information, please visit our [Disaster Recovery & Mitigation | California Department of Housing and Community Development](#). Please let us know if you need any other information.

**e. Public Comment Email Received from Santa Cruz County Officials on March 20, 2024**

HCD Team,

I am happy to discuss some of the elements of the proposed action plan, but I wanted to articulate some of my concerns as currently proposed:

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- Proposing \$35 million for Manufactured Home Replacement and elevation
  - The County has 1 mobile home park that lies within a FEMA flood zone, could language be added to this program to add the potential for a buy out to relocate folks out of the floodway entirely? Could they get funds to buy a new MHU and place it in another safer location in other words?
    - I support the place based allocations in ALL of the funding allocations, but perhaps there is a percentage hold back if one community oversubscribes, or the ability after a certain length of time to free up allocations to be available to other counties?
- Multi-family accelerator
  - There does NOT appear to be a place-based allocation for the Multi-family accelerator funding? This would be a shift from 2020 Action Plans.
  - I believe it is equally important to the above to have some defined amounts per County.
  - I would like to, given the proximity to the community of Pajaro have enough flexibility that IF an eligible project were identified within a certain distance of the impacted MID community the project could be developed in an adjacent jurisdiction, there is in the scoring criteria highest points given to 0-10 miles. This would encompass the community of Pajaro, which is in Monterey County.
  - Because there is no project CAP, I worry that without MID County allocations like in 2020 this could be challenging to implement equitably.
- Rural Resiliency Center Program
  - I do not know if the population or sizes of centers goes into the funding allocation formula. However, they are close enough that perhaps 33 percent for each County would be acceptable.
  - Could program eligibility include projects for NEW construction in more resilient locations for this population?

**HCD Response:**

Thank you for your comments and questions for the 23 CDBG-DR DR 4683 Action Plan. We appreciate engagement from our local partners as we implement CDBG-DR grants. HCD's aim for this CDBG-DR grant implementation is focused on the fastest way possible for implementation, while meeting program requirements and unmet recovery needs. It modified the method of delivery and removes various program requirements to meet this goal. Specifically, In response to your questions or comments:

1. Two mitigation measures have been proposed for MHRE program. First, MH owners can choose any MH park in the county to address their housing needs and reduce their risk profile. They are not required

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to stay in the same MH park they currently reside in. They must show an impact from DR 4683 for the tie-back provision of this grant. Second, current flood elevation standards are 1foot above base minimum. According to Dept of Water Resources Floodplain management division, 2 to 3 feet above base minimum will provide 500 year flood protection. It was their expert opinion to implement this measure. Buy-out programs were discussed, but none of the eligible jurisdictions, including Santa Cruz, had a plan or framework for executing this work. We encourage your office to work with planning grants, such as those from HUD, LCI or CalOES, to develop a buy-out program. This will help in securing funding to implement this work. Another option is the open NOFA from HUD for [Preservation and Reinvestment Initiative for Community Enhancement \(PRICE\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](https://www.hud.gov/programs/price) It has a June 5 application due date.

2. The MF Accelerator is focused on expediting construction of new MF affordable rental units. HCD may consider geographic distribution when making awards. Additional program criteria have shown to impact implementation timelines for prior CDBG-DR grants. The eligible pool of MF projects as of January 2024, shows a solid distribution across all eligible counties. HCD continues to make awards, so we expect this list to grow. DR 4683 is not eligible for use in Monterey County, so MF projects cannot be placed in that county.

No of Eligible Projects to date from HCD/DFSA (as of Jan 24)	County Location
6	Merced
7	San Joaquin
8	SLO
9	Santa Cruz
12	Ventura

3. CDBG-DR requires data analysis to tie allocations to unmet needs. The allocation for Rural Resiliency centers were based on unmet needs from Capital Needs Assessment completed for these centers. State resources covered a portion of these, but there are remaining needs at these existing facilities. These centers have a long history of neglect and can use these funds to provide both post disaster housing as well as for seasonal farmworkers. Improving these centers should

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be considered in addition to constructing new housing units to address our existing housing crisis. HCD issued a Serna farmworker NOFA in 2023 to construct new rental units, as well as a Serna homeownership NOFA projected in Summer 2024, to construct single family homes for farmworkers. Some of the projects eligible for MF Accelerator program include the Serna Farmworker rental housing awards.

Please let us know if you have additional questions. We will be reaching out soon to discuss implementation of the MHRE program to identify a local operator in Santa Cruz county.

**Follow-up Question from Santa Cruz County:**

Thanks for these responses. Could you please also provide us with a breakdown of the 9 Santa Cruz County projects on your MF accelerator list by which local city (or unincorporated county) they are located in? I'd like to know if any of them are in unincorporated Santa Cruz County.

**HCD Response:**

I would like to share the list, after the Action Plan is approved. Between now and then, some projects on the list now might get their tax credits and move into construction removing them from the list, while other new awards will be made to add to the list of viable

**d. Data Sources/Methodologies.**

**e. Important Definitions and Terms.**

AMI: Area Median Income  
CBDO: Community Based Development Organization  
CDBG: Community Development Block Grant  
CDBG-DR: Community Development Block Grant- Disaster Recovery  
CFR: Code of Federal Regulations  
CO: Certifying Officer  
CP: Participation  
DCM: Disaster Case Managers  
DOB: Duplication of Benefits  
DRGR: Disaster Recovery and Grant Reporting System  
FEMA: Federal Emergency Management Agency  
HCD Act: Housing and Community Development Act of 1974, as amended  
HMGP: Hazard Mitigation Grant Program  
IA: (FEMA) Individual Assistance  
LIHTC: Low-Income Housing Tax Credit  
LMI: Low and moderate-income

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MHU: Manufactured Housing Unit

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of general local government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers