



U.S. Department of Housing and Urban
Development
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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD- assisted 24 CFR Part 58

Project Information

Project Name: Tier I Environmental Review Record
State of California
2023 Community Development Block Grant – Disaster
Recovery, Owner-Occupied Mitigation Program

Responsible Entity (RE): State of California, Department of Housing and Community
Development (HCD)

State/Local Identifier: Ventura County, California under B-23-DG-06-0001

RE Preparer: Not Applicable

Certifying Officer: Stacy Rodgers, Disaster Recovery Branch Chief

Grant Recipient (if different than Responsible Entity): Not Applicable

Consultant (if applicable): Hagerty Consulting and Civix
Point of Contact: Doug Ganey

Project Location: Ventura County, California

Direct Comments to: Mattox Linden at dr-enviro@hcd.ca.gov

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed projects under this Broad-Level Tiered Environmental Review will be limited to Ventura County, California. 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. Due to the destruction, Ventura County was included in the presidentially declared disaster, DR-4683. Ventura County was identified as a Most Impacted and Distressed (MID) Area. As a result of DR-4683, the federal government appropriated Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to support the unmet recovery needs in Ventura County. The California Department of Housing and

Community Development (HCD) is the lead and responsible agency for administering the CDBG-DR funds allocated to the State of California.

The 2023 Manufactured Home Replacement and Elevation (MHRE) Program was established to provide grants to mobile home owners to fund the replacement and elevation of their qualifying mobile home or manufactured housing units (MHUs). Ventura County 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 supports the lack of unmet need for an MHRE program in Ventura County. Data provided by Disaster Case Managers in November 2024 shows that a very low number of MHUs in Ventura County were still damaged.

The OOM Program objectives are to provide aid to 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. Additionally, the Program is designed to ensure that the housing needs of very-low, low- and moderate-income (LMI) households and vulnerable populations are addressed to the greatest extent feasible. Applicants applying for OOM Program funding to mitigate their homes may receive up to \$100,000 in grant assistance.

The program will provide housing mitigation assistance to eligible applicants. Eligible program activities include the following, but not limited to:

- Remove any debris/combustible material items and vegetation (live or dead) under and within five feet from each structure, excluding decks and pergolas, unless deteriorated.
- Provide minimal grading away from the home to achieve positive drainage.
- Install pea gravel or other non-combustible hardscape under and within five feet from each structure, and if applicable, an attached deck in Zone 0.
- Remove any tree limbs and brush (live or dead) that is within five feet from each Zone 0 structure. Must have ten feet above roof and ten feet away from any chimneys and stovepipe outlets.
- Remove any combustible material items and vegetation (live or dead) on roof, including roof covering, roof valleys, and gutters.
- Remove any deteriorated and combustible non-structural features which are within the area of a means of egress from the structure that are within five feet of primary structure, which include combustible porches, stairs and landings, ramps, and railings. Replace it with ignition resistant standard grade material.
- 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").

- 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.
- Coat exposed foundation/stem wall/perimeter foundation with waterproof coating paint and sealant.
- Seal penetrations in walls up to the flood line with waterproof coating paint and sealant.
- Seal cracks in windows and doors which are below the flood line.
- 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.
- Repair any deteriorated areas or holes in combustible roof eaves, soffit, or fascia to prevent ember penetration into roof cavity.
- 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.
- Install metal flashing around the bottom, tops and sides of combustible garage doors to seal from embers.
- Install a spark arrestor for non-compliant chimneys and stovepipes.
- Install metal flashing or ignition-resistant material at roof-to-wall intersection to extend a minimum of 6 feet up the combustible wall and repair small gaps or holes in a combustible exterior.
- Remove any attached combustible fences, gates and retaining walls and replace with noncombustible alternative, up to eight feet on each side of the primary structure.
- Remove damaged gutters, or plastic gutters and downspouts and/or install metal gutters, gutter guards, downspouts, and underground downspouts.
- Replace and/or install aluminum window, door and sliding glass door screens.
- Install visible address marker on structure for emergency services if not clearly visible from street.
- 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.
- Install berms, swales and/or French drains around house.
- Provide resident with deployable flood barriers on doors and windows below the flood line.
- Install flood shutters, flood logs, flood gate on doors and windows below the flood line.
- Plant vegetation and add mulch on hills sloping towards property to control erosion.
- Remove all dead trees, plants, grass and weeds, dead or dry leaves, pine needles, cut lumber and firewood piles within 30 foot radius of primary structure – Zone 1 (5'-0" to 30'-0").
- 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").

- Create 10 feet 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").
- Create 10 feet of clearance of bare soil and nonflammable vegetation around all outbuildings and wood piles in Zone 2 (30'-0" to 100'-0").
- Remove any combustible material items and vegetation (live or dead) on roofs, or structures in Zone 2 (30'-0" to 100'-0").
- Cut or mow grass and shrubs to a minimum of 4" high in Zone 2 (30'-0" to 100'-0").
- Create horizontal and vertical space between shrubs and trees in Zone 2 (30'-0" to 100'-0").
- Remove all tree branches 6' from ground, and all shrubs from under trees. Dead needles, leaves twigs and bark permitted to depth of 3".
- Demolish and remove any Accessory Buildings which cannot be mitigated.
- Remove any combustible roof attachments (Solar Panel Mounts, HVAC Roof Mounts, Antenna Mounts, etc.) and replace them with non-combustible metal attachments.
- Repair up to 200 square feet 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).
- 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).
- 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.
- Replace or repair damaged siding and/or trim with ignition resistant siding and trim.
- Replace combustible garage door(s) if mitigation is not possible.
- Elevate electrical enclosures, junction boxes, panels, outlets, and switches above the flood line.
- Install ground fault circuit interrupters (GFCIs) in areas prone to water exposure. If not possible, make enclosures, wire and junctions rated for water submersion.
- Install a separate electrical main shut-off switch outside of main electrical panel.
- Provide backflow preventer on main water line.
- Install check valve on sewer line.
- Include rainwater harvesting tank or barrels.

- Remove or move any sheds or outbuildings not constructed of ignition resistant material (complying with current Building Code standards) to be at least 30' away from primary structures.
- Provide 6 vertical inches of noncombustible siding applied at ground-level and 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.

Program grant recipients must meet the following 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, mobile home or Manufactured Housing Unit. 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).
- Building code compliance must be easily attainable by the Program.

Prioritization criteria for participation in the Program will ensure that sufficient housing mitigation programming will be directed toward LMI beneficiaries.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the Program is to assist in the mitigation of homes that were not damaged by the 2023 disasters but are located in Ventura County, which was identified as a MID county. This Program will take place under the conditions of a housing crisis already affecting California, with low vacancy rates and increasing costs of construction. Recognizing the requirement included in Federal Register Notice 87 FR 6364 to address housing needs first, HCD has determined that mitigating owner-occupied housing is the priority for CDBG-DR funding currently available to California.

The need for the proposed Program is directly related to the need for assistance from homeowners with little other means to incorporate wildfire and flood mitigation measures. To fully understand the impacts and to better develop a long-term recovery strategy, the State of California has completed a comprehensive needs assessment for the disaster impact areas. The assessment specifically identifies the effects, long-term unmet needs, and priorities for the HUD allocated CDBG-DR funding intended to aid in recovery, resilience, and mitigation of future disasters.

Federal Register Notice 87 FR 6364 outlines the methodology HUD used to determine serious unmet needs for the major disasters. HUD's methodology typically uses Individual Assistance funding through the Federal Emergency Management Agency (FEMA) and the U.S. Small Business Administration home loan registrations to calculate serious unmet needs. For its part, HCD recognizes the importance of using a more granular and locally informed unmet needs methodology to build the foundation for an equitable distribution of recovery funds. To accomplish this, HCD has elected to utilize more detailed information and alternative data sources, particularly damage survey assessments by the California Department of Forestry and Fire Protection (CAL FIRE), to qualify both the impacts and remaining unmet needs for disaster declared areas. The CAL FIRE survey uses a post-disaster, property-by-property survey conducted of all destroyed properties, which presents a more accurate picture of the unmet recovery needs in MID areas. HCD also takes very seriously a commitment to not just anti-discrimination of protected classes, but also to support those individuals who may be disparately impacted. Therefore, HCD used demographic analyses to determine allocation methodologies and scoring priorities.

Existing Conditions and Trends [24 CFR 58.40(a)]:

Describe the existing conditions of the project area and its surroundings, and the trends likely to continue in the absence of the project.

The project area was severely damaged by the 2022 and 2023 disasters. Emergency response efforts, debris removal programs, and restoration projects have continued in the disaster areas since. Varying degrees of housing mitigation have started in the impacted areas, but many homes were not insured or were under insured and those owners lack the resources to mitigate their houses. Many of these residents are LMI households and may not be able to mitigate their homes without this program. The Program will allow willing, qualified homeowners to mitigate their homes on their existing properties, ensuring neighborhoods are better protected from future disaster.

Approximate size of the project area:

The project area is within the limits of Ventura County, see Figure 1.

Length of time covered by this review:

The Program activities are being evaluated through a tiered environmental review. This Tier 1 Review will be valid for five (5) program years after the issuance of the Authority to Use Grant Funds, barring any major changes in the program and/or in environmental conditions.

Maximum number of dwelling units or lots addressed by this tiered review:

Up to 100 units.

Level of Environmental Review Determination:

Environmental Assessment in compliance with the laws and authorities at 24 CFR §58.6 and §58.5.

Funding Information

Grant Number	HUD Program	Program Name	Funding Amount
B-23-DG-06-0001	CDBG-DR	OOM	\$6,320,112

Estimated Total HUD Funded Amount: \$6,320,112

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$6,320,112. This EA covers both project implementation and activity delivery costs under CDBG-DR.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No ☐ ☒	The purpose of 24 CFR Part 51D is to promote compatible land uses around civil airports and military airfields. It is HUD policy to not provide any assistance to projects and actions in Runway Protection, Accident Potential, or Clear Zones if the project is frequently used or occupied by people. To ensure compatible land use development, the site's proximity to civil and military airports must be determined. In accordance with 24 CFR 51.301(c), civil airports are defined as commercial service airports designated by the Federal Aviation Administration's National Plan of Integrated Airport Systems (NPIAS). In Ventura County, there are no commercial service airports (U.S. Department of Transportation, 2024).

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		HUD regulations include restrictions on construction and major rehabilitation in clear zones and accident potential zones associated with runways at military airfields. There are no known military clear zones or accident potential zones in Ventura County. This project is in compliance with 24 CFR Part 51 Subpart D.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No ☐ ☒	The Coastal Barrier Resources Act applies to coastal barriers along the Atlantic Ocean, the Gulf of Mexico, the Great Lakes, U.S. Virgin Islands, and Puerto Rico coasts. This project is located in a state outside of the Coastal Barrier Resource System. This project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No ☒ ☐	The Flood Disaster Protection Act of 1973 requires that projects receiving federal assistance be covered by flood insurance if they are located in a Special Flood Hazard Area (SFHA) as designated by the Federal Emergency Management Agency (FEMA). If a property is located in a SFHA on a National Flood Insurance Program map, the homeowner is required to maintain flood insurance. Ventura County participates in the NFIP (See Attachment 1) and has several areas that have been designated within the 100-year and 500-year floodplains provided on Figure 2 (FEMA, 2024). Compliance will be achieved at the site-specific level of environmental review.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Program applicants for home sites in the floodplain will be required to provide verification of flood insurance coverage before application approval. A Programmatic 8-step process was performed for floodplain impacts as described under the Floodplain Management section and provided as Attachment 2. Compliance will be achieved at the site-specific level of environmental review.
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No ☐ ☒	The Clean Air Act is administered by the U.S. Environmental Protection Agency (USEPA) which sets National Ambient Air Quality Standards. Ventura County is considered a nonattainment area as viewed on the USEPA's "Counties Designated Nonattainment" map (Attachment 3). The California Air Resources Board administers and enforces air quality in accordance with the State Implementation Plan per the Clean Air Act. According to the USEPA Greenbook, Ventura County was in nonattainment in 2025 for 8-hour Ozone (2008 & 2015 standards) (USEPA, 2025). The USEPA predicted the average indoor radon screening level for Ventura County as less than 2 picocuries per liter or Zone 3. USEPA recommends homes be fixed if the radon level is 4 pCi/L (picocuries per liter) or more. Because there is no known safe level of exposure to radon, EPA also recommends that Americans consider

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		fixing their home for radon levels between 2 pCi/L and 4 pCi/L. Ventura County is served by the Ventura County Air Pollution Control Agency feedback is provided in Attachment 3. Projects will be completed on existing home sites and do not include conversion of land use facilitating the development of public, commercial, or industrial facilities or five or more dwelling units. Site-specific projects will comply with any local construction permit and/or code requirements. This project is in compliance with the Clean Air Act.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No ☒ ☐	The coastal zone in Ventura County includes areas adjacent to the Pacific Ocean. The coastal zone in Ventura County is approximately 43 miles long and is bounded on the north by Santa Barbara county line and to the south by Los Angeles county line as presented in Figure 3. The coastal zone for Ventura County is governed by the South Central Coast District of the California Coastal Commission and Local Coastal Programs managed by Ventura County and the following cities: Oxnard, Port Hueneme, and Ventura. California Public Resources Code, Division 20, California Coastal Act, Section 30610(a) authorizes improvements to existing single-family residences; provided, however, that the commission shall

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		specify, by regulation, those classes of development which involve a risk of adverse environmental effect and shall require that a coastal development permit be obtained pursuant to this chapter. Site-specific projects located within the coastal zone will comply with applicable local regulations but will be subject to local coastal agency approval. Agency consultation correspondence is provided as Attachment 4. Compliance will be achieved at the site-specific level of environmental review.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No ☒ ☐	Proposed program activities will be completed on existing residential sites and potentially proximate to contaminated sites. It is HUD's policy, as described in 24 CFR Part 50.3(i) and 24 CFR 58.5(i)(2), that all properties proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, if a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property. Attention should be given to any proposed program site in the general proximity of areas such as dumps, landfills, industrial sites, or other locations that contain or may have contained hazardous wastes. California's Department of Toxic Substances Control (DTSC) maintains a list of hazardous waste and substances sites in its EnviroStor database. According

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		to EnviroStor’s “Hazardous Waste and Substances Site List (Cortese List)” there are four sites in Ventura County with active state or federal response (CA DTSC, 2025). There are 12 open leaking underground storage tank cases in Ventura County (GeoTracker, 2025). According to CA DTSC there are three permitted hazardous waste disposal facilities and two new pending hazardous waste disposal facility permits for Ventura County. In Ventura County, there is one listed “Superfund”/ National Priorities List site under the federal Comprehensive Environmental Response, Compensation and Liability Act (DTSC, 2025). A map of solid and hazardous waste disposal facilities, contaminated sites, and large quantity hazardous waste generator locations in Ventura County is provided as Figure 4. Program locations may include lead-based paint and materials containing asbestos. These are hazardous materials that could affect the health of residents. All activities must comply with applicable federal, state, and local laws and regulations regarding asbestos and lead-based paint. Compliance will be achieved at the site-specific level of environmental review.
Endangered Species Endangered Species Act of	Yes No ☒ ☐	The Endangered Species Act (ESA), as amended, is intended to protect and recover species in danger of extinction and the ecosystems they depend upon. HUD

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
1973, particularly section 7; 50 CFR Part 402		must ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species in the wild or destroy or adversely modify its critical habitat. Program locations in Ventura County could potentially impact resources managed or regulated by the U.S. Fish and Wildlife Service (FWS) and/or the California Department of Fish and Wildlife (CDFW). In Ventura County there are 48 threatened, endangered, or candidate species and 15 critical habitats managed or regulated by the FWS. In addition to these federally-listed species, the CDFW has identified 24 species classified as endangered, threatened, or official candidate under the California Endangered Species Act. Since the program consists of existing single-family owner-occupied housing mitigation activities generally within the existing footprint, no habitat disturbance is expected. Figure 5 shows threatened and endangered species and critical habitats found in Ventura County. See Attachment 5 for the Ventura County federal and state official species list and agency coordination. Compliance will be achieved at the site-specific level of environmental review.
Explosive and Flammable Hazards	Yes No ☐ ☒	The purpose of the explosive and flammable hazards category is to establish safety standards to keep HUD-assisted projects at acceptable distances from

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
24 CFR Part 51 Subpart C		specific, stationary, hazardous operations that store, handle, or process hazardous substances. The proposed projects do not increase residential densities as they are owner-occupied housing mitigation activities. Because the proposed projects do not increase the number of people being exposed to hazardous operations by increasing residential densities, the proposed project does not meet the definition of a HUD-assisted project per 24 CFR 51.201. The proposed projects will not include hazardous facilities, a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries. This project is in compliance with 25 CFR Part 51, Subpart C.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No ☐ ☒	The purpose of the Farmland Protection Policy Act is to minimize the effect of Federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. This program will provide grants to eligible homeowners to mitigate their homes in federally declared disaster areas. Project activities do not involve farmland conversion and take place on land that was already committed to urban development. This project is in compliance with the Farmland Protection Policy Act.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No ☐ ☒	HUD regulations require compliance with Executive Order 11988, Floodplain Management. Executive Order 11988 requires federal activities to avoid impacts to flood plains and to avoid direct and indirect support of floodplain development to the extent practicable. The purpose of this program is for owner-occupied homes to add wildfire and flood mitigation features to reduce damage from future disasters. Any activities will take place in the disturbed area of the developed parcel and are not expected to result in any permanent direct or indirect impacts to the floodplain. Nevertheless, each subject property will be evaluated for its exact location within the Federal Flood Risk Management Standard (FFRMS) floodplain and the base flood elevation (BFE) in the area to evaluate flood risks and impacts. A programmatic 8-step wetland/floodplain decision-making analysis was performed for the project to determine whether there are practicable alternatives to providing CDBG-DR assistance in these areas. The Programmatic 8-step process was performed for potential floodplain and wetland impacts in the Program counties. This analysis is provided as Attachment 2 and contains a review of alternatives to the proposed project work in the floodplain. The selected alternative, Alternative 1, allows for the mitigation of homes located in the floodplain. Alternative 1 does not allow for project work in the regulatory

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		floodway since HUD will not fund projects in the floodway. Early and final notices of the 8-step analysis were posted on HCD's website in the Program counties as described in Attachment 2. No public comments were received on either notice. Compliance with Executive Order 11988 has been attained for home sites in the project area.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No ☒ ☐	The National Historic Preservation Act of 1966, particularly Sections 106 and 110, protects historic properties from possible harm by federal agency programs. Section 106 review is detailed in 36 CFR Part 800 and will be followed during Tier 1 and Tier 2 activities. Each subject property will be evaluated to determine the year-built date of structures to be replaced. Properties over 45 years may be considered a historic property. For potentially historic properties and buildings, consultation with the California State Historic Preservation Officer (SHPO) will be necessary to determine if the site is historic and if the undertaking will have adverse effects. Reconstruction of destroyed historic features or mitigation for loss of such features may be required. Native American tribes with potential cultural and traditional affiliations to Ventura County were contacted.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		See Attachment 6 for letters to California SHPO and associated tribal consultation information. Compliance will be achieved at the site-specific level of environmental review.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No ☐ ☒	It is HUD's general policy to provide minimum national standards applicable to HUD programs to protect citizens against excessive noise in their communities and places of residence. For modernization projects in noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. The HUD Noise Abatement and Control requirements do not apply to any action or emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster. This program provides grants to mitigate homes from future disaster; therefore it is exempt from HUD Noise and Abatement Control requirements per 24 CFR Part 51.101(a)(5)). The Project is in compliance with the Noise Control Act of 1972, as amended.
Sole Source Aquifers	Yes No ☐ ☒	According to the U.S. Environmental Protection Agency's Sole Source Aquifers

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		(SSA) Protection Program, there are no Sole Source Aquifers in Ventura County. The Project is in compliance with the Safe Drinking Water Act of 1974, as amended.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No ☒ ☐	Executive Order 11990 protects wetlands and requires federal activities to avoid adverse impacts to wetlands. Jurisdictional wetlands are visible through the National Wetlands Inventory Map. Ventura County wetlands are shown in Figure 6, National Wetlands Inventory Map. The purpose of this project is for eligible homeowners of owner-occupied residential structures in Ventura County to incorporate wildfire and flood mitigation measures. Any activities will take place on developed parcels and are not expected to result in any new permanent direct or indirect impacts to wetlands. Nevertheless, each subject property will be evaluated for its proximity to wetland resources. A programmatic 8-step decision making analysis was performed to determine whether there are practicable alternatives to providing CDBG-DR assistance in these areas. Best management practices for soil erosion and stormwater management will be applied as appropriate for protection of wetlands. The Programmatic 8-step analysis is provided as Attachment 2. The selected alternative, Alternative 1, allows for

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		mitigation of homes located adjacent to wetlands but specifies minimum construction BMPs for protection of water quality and wetlands ecology. Early and final notices of the 8-step analysis were posted on HCD's website as described in Attachment 2. No public comments were received on either notice. Compliance with Executive Order 11990 has been attained for home sites in the Program County.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No ☒ ☐	The Sespe Creek in Ventura County is designated as a Wild and Scenic River according to the Wild and Scenic River Systems Designations Map, compiled by the USDA Forest Service (USDA Forest Service, 2016). This river has outstanding natural, cultural, and recreational values and the Act is intended to protect these rivers in a free-flowing condition for the enjoyment of present and future generations. The Nationwide Rivers Inventory (NRI) is a listing of free-flowing river segments that are potential candidates for future inclusion in the National Wild and Scenic River System. Under the Wild and Scenic Rivers Act section 5(d)(1) and related guidance, all federal agencies must seek to avoid or mitigate actions that would adversely affect an NRI segment. The NRI river segments located in Ventura County include: Piru Creek and Big Sycamore River (NPS, 2016).

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Each subject property will be evaluated for its proximity to the above noted Wild and Scenic and NRI river segments. Any properties within proximity will be evaluated to see if the project would pose an adverse effect on the natural, cultural, and/or recreational values of the river. Figure 7 shows the location of the Wild and Scenic and NRI river segments in Ventura County. See Attachment 7 for National Park Service consultation. Compliance will be achieved at the site-specific level of environmental review.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27]

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the Program area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action.

Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

(1) Minor beneficial impact

(2) No impact anticipated

(3) Minor Adverse Impact – May require mitigation

(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
Land Development		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Program's mitigation activities will be conducted on existing residential lots, consistent with local planning and zoning ordinances. Land use and housing density would not change and would therefore remain compatible with existing and surrounding land uses. The mitigated homes would provide a benefit by making houses safer and more fire resistant in disaster-prone areas.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	The soil in the Program area is assumed to be suitable for its proposed use since it has previously supported the same use at the same location. Slope is not expected to be altered due to the proposed Program and impacts from changes in slope drainage patterns and are not anticipated. Exposed soils will be protected from storm water runoff using erosion and sediment control measures sufficient to prevent soils from reaching onsite or offsite wetlands or waters.
Hazards and Nuisances including Site Safety and Noise	3	The natural hazards present in the Program area would be similar to those previous to wildfires and flooding. Hazard mitigation programs are being

Environmental Assessment Factor	Impact Code	Impact Evaluation
		implemented throughout high hazard areas of the state to reduce the risk from wildfire, flooding and other disasters. Depending on location, these may include requirements for ground elevation, as well as other hazard mitigation defensible space (e.g. 100-feet of vegetation clearance as wildfire defensible space) around houses and home “hardening” or ignition-resistant construction requirements. Design and construction approval is to be coordinated with the local building and/or planning department. Hazards and nuisances and site safety during construction will be assessed on a site-by-site basis. Contractors will be required to provide health and safety plans and monitoring during mitigation. Implementation activities would result in ambient noise levels being temporarily elevated in the areas around each site. Temporary noise impacts would be mitigated to the greatest extent feasible. The Program is not expected to have impacts on long-term ambient noise levels as future noise levels at the home sites are expected to be similar to levels before the disasters occurred.
Energy Consumption	1	Project activities would consume energy over the short-term implementing the Program, but significant changes in long-term energy consumption are not anticipated as the Program is mitigating existing homes, not expanding the housing supply. Homes would be mitigated using current building codes which require the use of energy efficient building materials and systems and would likely result in a slight reduction in energy consumption. All proposed actions will comply with HUD standards and local building codes.
Socioeconomic Factors		
Employment and Income Patterns	2	Employment and income patterns of the impacted County will not be significantly altered by the proposed Program. The Program would not create new demand for employment that did not exist before the disasters occurred.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Demographic Character Changes, Displacement	2	The proposed Program will support inclusive neighborhoods and not significantly alter the demographic characteristics of the community. The proposed Program will not cause direct or indirect displacement.
Community Facilities and Service		
Educational and Cultural Facilities	2	Educational and cultural facilities of the impacted County will not be significantly altered by the proposed Program. The Program would not create new demand for these facilities that did not exist before the disasters occurred.
Commercial Facilities	2	The Program would not significantly alter demand for local goods and services and support local commercial facilities. Those businesses and commercial facilities that support the residential construction industry and its workforce could see a temporary increase in demand during implementation of the Program.
Health Care and Social Services	2	The Program would not create new demand for health care and social services that did not exist before the disasters occurred. It is expected that these facilities should be able to provide services at pre-disaster levels, after a period of adjustment. Therefore, no significant impacts to health care and social services are anticipated.
Solid Waste Disposal / Recycling	2	Program activities would result in generation of construction waste in the short-term. All solid waste would be properly handled and disposed of or recycled in accordance with applicable regulations. The proposed activities would return residents to impacted areas and would not create new demand for long-term solid waste/recycling collection and disposal services.
Waste Water / Sanitary Sewers	2	The Program would not create new demand for wastewater collection and treatment services that did not exist before the disasters occurred. Mitigated houses are expected to utilize existing septic systems or existing sewer service. Repairing or replacing septic systems are not included on the

Environmental Assessment Factor	Impact Code	Impact Evaluation
		list of program activities. Therefore, no significant impacts to wastewater services are anticipated.
Water Supply	2	The Program would not create new demand for water supply services that did not exist before the disasters occurred. Mitigated houses are expected to utilize the same source of water that supplied the home before the disaster. Repairing or replacing wells are not included on the list of program activities. Therefore, no significant impacts to water supply services are anticipated.
Public Safety - Police, Fire and Emergency Medical	2	The Program would not create new demand for public safety services including police, fire, and emergency medical that did not exist before the disasters occurred. It is expected that these facilities should be able to provide services at pre-disaster levels, after a period of adjustment. Therefore, no significant impacts to public safety services are anticipated.
Parks, Open Space and Recreation	2	The Program would not introduce new residents to the impacted county, therefore there would be no change to the demand for parks, open space and recreation from pre-disaster levels. Mitigation activities would occur on previously zoned and developed lots and would not adversely impact open space.
Transportation and Accessibility	2	The proposed Program consists of the mitigation of homes and will not result in changes to public transportation. Some slight increases to ridership may occur on public transportation, although levels are expected to remain near pre-disaster levels. Accessibility design requirements will not be applicable as the homes being mitigated are private.
Natural Features		
Unique Natural Features, Water Resources	2	The proposed Program consists of the mitigation of houses on developed lots and would not have impacts on unique natural features or water resources.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Vegetation and Wildlife	3	Mitigation activities would occur on developed lots that were not damaged by wildfire and/or flooding. Significant impacts to vegetation or wildlife due to mitigation activities are not anticipated, although site-specific pre-construction biological surveys and/or monitoring during construction would be required if sensitive vegetation and wildlife species are observed during the Tier 2 onsite surveys.
Climate and Energy		
Climate Change Impacts	2	HUD provides guidance for climate change analysis stating that the first step is to understand the likely impacts of climate change in the project area. Then, the project can employ adaptation strategies, such as those found in the USEPA's Climate Change Adaptation Resource Center. California is preparing for a changing climate and increased threat of frequent and extreme weather events. The project is designed in a way that it will withstand, within the useful life of the project, the expected climate related changes projected for the area. Hazard mitigation programs are being implemented throughout high hazard areas of the state to reduce the risk from wildfire. In the past decade California has adopted new building codes to increase the resilience of homes. Increased home resilience leads to a reduction in loss due to wildfire, flood, earthquake, mudslide, or other natural disaster; and safeguards the federal investment of CDBG-DR funds in the housing recovery process. This program aligns with the state's Integrated Climate Adaptation and Resiliency Program, which directs state agencies to account for current and future climate conditions, including an increased likelihood of natural disasters, in all infrastructure investment. There will not be increased detrimental impacts to the social vulnerability of the project's residents and surroundings from the proposed project, as low- to moderate-income residents will have homes mitigated to a higher standard of protection from wildfires and/or flooding.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		The overall Program impact with respect to climate change is a no impact anticipated.
Energy Efficiency	1	The Program will consist of the mitigation of existing homes and incorporate higher energy efficiency standards than their original construction. Housing mitigation will be designed to meet the requirements of HUD's Green Building Standards and. California Green Building Standards Code (CALGreen). CALGreen is California's first green building code, enacted as mandatory in 2011, and adopted to address five divisions of building construction and improve public health, safety and general welfare. The divisions addressed are as follows: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The State of California intends to promote high quality, durable, energy efficient, and sustainable mitigation methods and materials in all Program areas. HCD is considering all industry-recognized standards, including LEED, as required by the Federal Register Notice, as it develops its program guidelines. The overall Program impact with respect to energy efficiency is a minor beneficial impact.

Additional Studies Performed:

No additional studies were performed as part of this Tier 1 EA. Citations are provided in the reference section of this document.

Additional studies that may be required during Tier 2 could include wetlands delineations and phase I environmental site assessments depending on the findings of site-specific environmental reviews. Pre-construction biological and/or cultural resources surveys may also be required.

Field Inspection (Date and completed by):

Field inspections will be conducted as part of the Tier 2 environmental reviews once specific OOM program sites are identified. Tier 2 environmental review reports will be included as Attachment 8 and as part of the HUD Environmental Review Record.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Sources, Agencies, Persons Consulted	Title
Stacy Rodgers	Branch Chief, California Department of Housing and Community Development
Erin Wilson-Olgin	Regional Manager, California Department of Fish and Wildlife
Reginald Pagaling	Vice Chairperson, Native American Heritage Commission
Steve Bowes	California Project Coordinator – Wild and Scenic Rivers
Julianne Polanco	State Historic Preservation Officer
Shannon Pries	State Historian II
Paul Souza	Regional Director, U.S. Fish and Wildlife Service
Ali Reza Ghasemi	Air Pollution Control Officer, Ventura County Air Pollution Control District
Steve Hudson	California Coastal Commission, South Central Coast
Rosalie del Rosario	West Coast Region Endangered Species Act Section 7 Consultations Coordinator West, U.S. National Marine Fisheries Service
Native American Tribes (Copies of Tribal consultation letters attached to this Environmental Assessment)	

List of Permits Obtained:

Standard building permits and approvals will be obtained as required by Ventura County. The potential need for State of California and Federal government environmental permits (e.g. Clean Water Act National Pollution Discharge Elimination System [NPDES]) will be obtained if necessary for site-specific work.

Public Outreach [24 CFR 50.23 & 58.43]:

The California HCD, as the responsible entity, prepared a Finding of No Significant Impact (FONSI) notice using the current HUD-recommended format to present a finding of no

significant impact to the public. The FONSI notice was published concurrently with NOI/RROF required by § 58.70. The combined notice clearly indicates an intention to meet two separate procedural requirements and advises the public to specify which part of the Notice they are addressing. All comments were considered, and any necessary modifications made prior to completion of the environmental certification. Outreach included email notification to known interested individuals and groups including the appropriate Tribal, local, State and Federal agencies. The Notice will be posted concurrently with the legal notices published on HCD's website (<https://www.hcd.ca.gov/grants-and-funding/disaster-recovery-and-mitigation/environmental-compliance-dr-oor>).

Cumulative Impact Analysis [24 CFR 58.32]:

The emergency response, debris removal program, and ongoing reconstruction efforts following wildfire disasters statewide from 2017 through 2023 have resulted in increased truck traffic across the disaster-impacted areas. Hazard tree and debris removal programs both public and private have been performed or are ongoing for multiple disaster areas. These efforts will result in substantial additional truck trips and construction equipment working statewide but focused in the areas of heaviest impacts.

These multiple, simultaneous disaster recovery and rebuilding efforts located within the impacted areas have the potential to result in cumulative environmental impacts with respect to environmental impact categories including air quality, water quality, noise, biological resources, etc.

The Program houses will be spread across Ventura County. The small footprint of these home mitigation projects and their widespread distribution across the County means the OOM Program is not expected to have a significant cumulative environmental impact.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]:

There is no alternative to mitigating homes that is considered viable for analysis. The proposed Program is intended to assist homeowners in mitigating their homes to make them more resistant to future disasters. The results of this Tier 1 analysis as documented by sufficient evidence documented herein, indicates the proposed project merits a FONSI. Potential environmental impacts, both beneficial and adverse have been evaluated. Environmental mitigation measures will be implemented to eliminate or minimize potential adverse environmental impacts associated with housing mitigation.

No Action Alternative [24 CFR 58.40(e)]:

Without the proposed Program, some or all of the eligible houses would not be mitigated, leaving the houses susceptible to severe damage in the event of future disasters. The No Action Alternative could have minimal ecological benefits, but it would have negative socioeconomic impacts on the nine disaster-impacted counties. This option would deny aid to willing very low-, low-, and moderate-income homeowners to receive mitigation

assistance for their homes and deny opportunities to aid with actions that restore neighborhoods by preserving the quality and property value of homes. This option does not promote HCD's disaster funding goal which is to help communities and neighborhoods that otherwise might not recover due to limited resources. The CDBG-DR funds are available for housing mitigation; therefore, the no action alternative is not considered viable.

Summary of Findings and Conclusions:

The project will contribute much needed assistance for disaster mitigation by providing mitigation features to homes in areas that are likely to experience future disasters. The Program will meet HUD standards for mitigation, and no significant impact is foreseen.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]:

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Site-specific environmental mitigation measures will be developed in detail contingent on the findings of site-specific Tier 2 environmental reviews. The following general Tier 1 mitigation measures will be required project-wide.

Law, Authority, or Factor	Mitigation Measure
Coastal Zone Management	1. Determine if the site is within the California Coastal Zone. If no, review complete. 2. If yes, the California Coastal Commission will be contacted to determine the appropriate coastal development permit process.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	1. Identify any facilities near the proposed project location that contained hazardous materials, contamination, toxic chemicals, etc., using California's EnviroStor database. This includes sites within 3,000-feet of a solid waste landfill; a proposed location with an underground storage tank; or a hazardous waste site. If none, and home was built after 1978, review complete. 2. If yes, work with HCD to identify the mitigation needed according to applicable regulations to ensure the homeowner

Law, Authority, or Factor	Mitigation Measure
	will not incur exposure to any toxic chemicals or contaminants. A Phase I environmental site assessment prepared in accordance with ASTM International, Inc. standards may be required. 3. For homes built prior to 1978: - All exposed surfaces shall be inspected for lead-based paint and defective surfaces will be tested for lead based paint. If any lead-based paint is found, coverage, removal, or other corrective action will be taken to comply with applicable regulations. - Homes are tested for the presence of asbestos if the home is demolished for replacement.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	- Determine if all proposed activities are occurring in the pre-existing disturbed area associated with the structure. Confirm the following: - The scope of work does not include any native tree removal. - The scope of work does not have the potential to affect any federally or state-listed species and/or designated critical habitat. - The pre-construction survey of the property/project location does not identify any nesting birds that may be protected under the Migratory Bird Treaty Act (MBTA) of 1918 or adjacent to a stream. - If yes to all, review concluded. - If proposed activities involve construction outside of pre-existing disturbed area, evaluate if any of the federally or state listed species or critical habitats are present or potentially present? Are they potentially subject to disturbance from project activities? If yes, prepare a Biological Assessment to assess if proposed activities “may affect” proposed species and designated and proposed critical habitat. - Consult State and Federal wildlife agencies if needed for determination (e.g. property is adjacent to a stream).

Law, Authority, or Factor	Mitigation Measure
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Ventura County participates in the National Flood Insurance Program. 1. Include a copy of the FEMA Flood Insurance Rate Map (FIRM) for the proposed site. 2. If the proposed site is in a special flood hazard area (SFHA), a copy of the flood insurance policy declaration or paid receipt should be obtained. Homeowners are required to maintain flood insurance if the program activity is within a SFHA.
Floodplain Management	Identify if the proposed site is in a the FFRMS floodplain based upon the steps in the 8-Step Analysis and HCD's standard procedures for floodplain evaluation (Attachment 2). Project sites located within the FFRMS (100- year or 500-year floodplain) have been addressed in the attached Programmatic 8-Step Process document prepared according to 24 CFR Part 55.20. If the parcel is located within the FFRMS floodplain mitigation is permitted under the Program as described in the 8-Step analysis. The Program will not result in increased net development in the floodplain. Review the property locations to identify any within a FEMA-delineated regulatory floodway. Any located within a FEMA-delineated floodway are not eligible for the Program.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	For potentially historic properties and buildings (45 years old or greater), consultation with the SHPO will be necessary to determine if site is historic and if the undertaking will have adverse effects. The following process will be followed: 1. HCD will request consultation under Section 106 from the SHPO if any of the following circumstances are encountered: a. A subject property will undergo exterior work and is older than 45 years old; b. A rehabilitation project involves substantial earth moving, such as footing/foundation trenching, utility line excavation, septic tank excavation, or if the possibility exists that such earth disturbance may or will occur on or near an archeological site; or,

Law, Authority, or Factor	Mitigation Measure
	If any activities would be considered new construction, HCD will consult with SHPO on a case-by-case basis. Full SHPO consultation procedures are provided in Attachment 6.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Verify if the project area is located adjacent to a designated wetland or within the wetland buffer zone identified on the NWI. If so, install minimum construction BMPs as stated in the 8 Step Process (Attachment 2). An Erosion Control Plan including the placement of BMPs for soil erosion prevention and water quality will be implemented in advance of construction. Any construction sites greater than 1 acre will require permitting under NPDES through the California Regional Water Quality Control Board; however, the maximum ground disturbance on any Program lot will be limited to one half acre.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	1. Determine if the site is within proximity (generally within a quarter of a mile) to a Wild and Scenic River or a NRI listed river segment. 2. Consult with the managing federal agency to determine if the proposed project may have an adverse effect on the natural, cultural, and/or recreational values of the river and, if so, to determine the appropriate avoidance or mitigation measures.

REFERENCES

California Coastal Commission. (2025) *Local Coastal Program Areas*.
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California State Water Resources and Control Board. (2025). *GeoTracker database*.
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U.S. Environmental Protection Agency. (August 5, 2025). *RCRA Info Search*.
<https://enviro.epa.gov/facts/rcrainfo/search.html>.

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Determination:

- ☐ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.
- ☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27] The project may significantly affect the quality of the human environment.

Preparer Signature: _____ Date: _____

Name/Title/Organization: _____

Certifying Officer Signature: _____ Date: _____

Name/Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

This document represents the Tier 1 or Broad-Level review *only*. As individual sites are selected, this review must be supplemented by individual Tier 2 or Site-Specific reviews for each site. All laws and authorities requiring site-specific analysis will be addressed in these individual reviews

Attachment 1: National Flood Insurance Program Information

Attachment 2: 8-Step Floodplain and Wetland Analysis

Eight-Step Decision-Making Process

Programmatic Compliance with Executive Order 11988

Floodplain Management, as amended by Executive Order 13690, and 11990 Protection of Wetlands

2023 Community Development Block Grant – Disaster Recovery (CDBG-DR)

Owner Occupied Mitigation (OOM) Program Ventura County

The California Department of Housing and Community Development (HCD) 2023 CDBG-DR OOM Program will assist local jurisdictions with home mitigation projects to mitigate future disaster risks and to provide decent, safe, and sanitary housing in the areas impacted by the disaster. The OOM Program is designed to ensure that the housing needs of very-low, low- and moderate-income (LMI) households and vulnerable populations, including individuals who were made homeless as a result of the disaster, are addressed to the greatest extent feasible.

The OOM Program will provide home mitigation assistance to eligible applicants. Eligible homes must be located in Ventura County. Eligible properties must be a single-family dwelling on a permanent foundation or affixed to a permanent pad. Eligible Program activities include the following:

- Remove any debris/combustible material items and vegetation (live or dead) under and within five feet from each structure, excluding decks and pergolas, unless deteriorated.
- Provide minimal grading away from the home to achieve positive drainage.
- Install pea gravel or other non-combustible hardscape under and within five feet from each structure, and if applicable, an attached deck in Zone 0.
- Remove any tree limbs and brush (live or dead) that is within five feet from each Zone 0 structure. Must have ten feet above roof and ten feet away from any chimneys and stovepipe outlets.
- Remove any combustible material items and vegetation (live or dead) on roof, including roof covering, roof valleys, and gutters.
- Remove any deteriorated and combustible non-structural features which are within the area of a means of egress from the structure that are within five feet of primary structure, which include combustible porches, stairs and landings, ramps, and railings. Replace it with ignition resistant standard grade material.
- 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").
- 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.
- Coat exposed foundation/stem wall/perimeter foundation with waterproof coating paint and sealant. Seal penetrations in walls up to the flood line with waterproof coating paint and sealant.

- Seal cracks in windows and doors which are below the flood line. Replace the following vents with Office of the State Fire Marshall (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.
- Repair any deteriorated areas or holes in combustible roof eaves, soffit, or fascia to prevent ember penetration into roof cavity.
- 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. Install metal flashing around the bottom, tops and sides of combustible garage doors to seal from embers.
- Install a spark arrestor for non-compliant chimneys and stovepipes.
- Install metal flashing or ignition-resistant material at roof-to-wall intersection to extend a minimum of 6 feet up the combustible wall and repair small gaps or holes in a combustible exterior.
- Remove any attached combustible fences, gates and retaining walls and replace with noncombustible alternative, up to eight feet on each side of the primary structure.
- Remove damaged gutters, or plastic gutters and downspouts and/or install metal gutters, gutter guards, downspouts, and underground downspouts.
- Replace and/or install aluminum window, door and sliding glass door screens. Install visible address marker on structure for emergency services if not clearly visible from street.
- 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. Install berms, swales and/or French drains around house.
- Provide resident with deployable flood barriers on doors and windows below the flood line.
- Install flood shutters, flood logs, flood gate on doors and windows below the flood line. Plant vegetation and add mulch on hills sloping towards property to control erosion.
- Remove all dead trees, plants, grass and weeds, dead or dry leaves, pine needles, cut lumber and firewood piles within 30 foot radius of primary structure – Zone 1 (5'-0" to 30'-0").
- 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").
- Create 10 feet 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").
- Create 10 feet of clearance of bare soil and nonflammable vegetation around all outbuildings and wood piles in Zone 2 (30'-0" to 100'-0").
- Remove any combustible material items and vegetation (live or dead) on roofs, or structures in Zone 2 (30'-0" to 100'-0").
- Cut or mow grass and shrubs to a minimum of 4" high in Zone 2 (30'-0" to 100'-0").
- Create horizontal and vertical space between shrubs and trees in Zone 2 (30'-0" to 100'-0").
- Remove all tree branches 6' from ground, and all shrubs from under trees. Dead needles, leaves twigs and bark permitted to depth of 3".

- Demolish and remove any Accessory Buildings which cannot be mitigated.
- Remove any combustible roof attachments (Solar Panel Mounts, HVAC Roof Mounts, Antenna Mounts, etc.) and replace them with non-combustible metal attachments.
- Repair up to 200 square feet 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).
- 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).
- 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.
- Replace or repair damaged siding and/or trim with ignition resistant siding and trim.
- Replace combustible garage door(s) if mitigation is not possible.
- Elevate electrical enclosures, junction boxes, panels, outlets, and switches above the flood line.
- Install ground fault circuit interrupters (GFCIs) in areas prone to water exposure. If not possible, make enclosures, wire and junctions rated for water submersion.
- Install a separate electrical main shut-off switch outside of main electrical panel.
- Provide backflow preventer on main water line.
- Install check valve on sewer line. Include rainwater harvesting tank or barrels.
- Remove or move any sheds or outbuildings not constructed of ignition resistant material (complying with current Building Code standards) to be at least 30' away from primary structures.
- Provide 6 vertical inches of noncombustible siding applied at ground-level and 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.
-

Based upon the project description, none of the exceptions at 24 CFR 55.12 or 55.13 apply, and therefore, the 8-Step process is required, including an evaluation of direct and indirect impacts associated with the construction, occupancy, and potential modification of the floodplains and/or wetlands.

Step 1: DETERMINE IF PROPOSAL IS IN A FEDERAL FLOOD RISK MANAGEMENT STANDARD FLOODPLAIN OR WETLAND

This project proposes the mitigation of homes on scattered sites throughout the Program County. Each proposed project location will be evaluated for its exact location within the Federal Flood Risk Management Standard (FFRMS) floodplain and the BFE in the area. Each project will first be evaluated using the Climate-Informed-Science-Approach (CISA), which applies the best-available, actionable, hydrologic, and hydraulic data, if available, to determine its exact location of the project site with respect to the FFRMS. If CISA data are not available for the proposed project location, the FEMA Map Service Center will be evaluated to determine if FEMA defined the 0.2-percent-annual-chance floodplain and provides a BFE. If neither CISA nor FEMA-mapped data are available for the Percent Annual Chance Floodplain Approach 0.2-PFA, the Freeboard Value Approach must be used and an additional two feet must be added to the BFE.

Table 1 shows the Program-eligible California County being analyzed and the acres of land in the floodplain and wetlands. The FEMA 1-percent annual chance (“100-year floodplain”) and 0.2-percent annual chance (“500-year floodplain”) floodplain data layers were used for this analysis. The U.S. Fish and Wildlife Service National Wetland Inventory (NWI) was used to calculate the area of wetlands.

Table 1 – Floodplain and Wetland Areas		
County	Acres of 500 & 100-Year Floodplain	Acres of NWI Wetlands
Ventura	38,998	334,640

It is noted that all properties in the program will be developed, single-family residential properties. Floodplain and wetlands will be considered on a site-specific basis during the Tier 2 environmental review process and any work in floodplains and wetlands will be avoided to the maximum extent practical. Best management practices (BMPs) for soil erosion and stormwater management will be applied through minimum construction standards.

Step 2: INVOLVE PUBLIC IN DECISION-MAKING PROCESS (NOTICE)

The Early Floodplain/Wetland Public notice was published on HCD’s website at: <https://www.hcd.ca.gov/grants-and-funding/environmental-review> on **DATE**. The required 18 days were allowed for early public review. Copies of the publication are provided at the end of this 8-Step analysis. No public comments were received on the early notice.

Step 3: DETERMINE IF THERE IS A PRACTICABLE ALTERNATIVE

HCD considered the following factors in developing the OOM program, including:

- Mitigating future disaster risks and providing decent, safe, and sanitary housing in the areas impacted by the disaster.
- Ensuring that the housing needs of very-low, low- and moderate-income households and vulnerable populations are addressed to the greatest extent feasible.

HCD considered several alternative actions in terms of the goals identified in the project description and reviewed or considered through the lenses of natural, social, and economic values explained in 24 CFR 55.20(c)(2):

Alternative 1: Perform home mitigation in the FFRMS floodplain but not in the floodway.

This option appears to be the best option for selection since it allows the maximum number of homes to be selected under 24 CFR 55 possible. Homes that were previously built in the floodplain may be mitigated, but homes that are in the floodway may not be mitigated under the OOM Program. A regulatory floodway comprises the channel of a river or other watercourse and the adjacent land areas that must be reserved to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. This is the segment of the floodplain which presents the greatest risk to structures. Based on information received to date, this option leaves out very few homes that were identified during the early application process as being in a floodway. This option aligns with the U.S. Department of Housing and Urban Development (HUD)'s directive not to provide financial assistance in floodways unless an exception in section 55.12(c) applies or the project is a functionally dependent use (e.g. dams, marinas, and port facilities) or a floodplain function restoration activity.

Alternative 2: Mitigate homes outside of the FFRMS floodplain.

While this option is the most protective of the FFRMS floodplain (and wetland areas), it does not allow the maximum number of homeowners to be served by the CDBG-DR OOM Program. To be eligible for the Program, each property must have been correctly permitted and permissible for the zoning area or local development standard. This option would deny aid to willing very low-, low-, and moderate-income homeowners to receive mitigation assistance for their homes and deny opportunities to aid with actions that restore neighborhoods by preserving the quality and property value of homes. This option does not promote HCD's disaster funding goal which is to help communities and neighborhoods that otherwise might not be able to mitigate wildfire damage due to limited resources.

Alternative 3: Evaluate infrastructure action or other flood protection measures.

Historically, flood control measures have been used to protect housing in a floodplain using dikes, walls, levees, and other flood protection structures. These mitigation measures have proven to have mixed results in effectively protecting communities from flooding. These actions do not address the housing needs of the homeowners, and in general are not feasible based on the limited size of most properties and are far less effective when implemented on individual scattered sites. Flood protection structures are prohibitively expensive on a house-by-house, or small-scale basis. Furthermore, construction of these structures oftentimes redirects the flooding problem onto other properties downstream. For these reasons, this alternative is not practicable.

Alternative 4: "No Action"

The "No Action" alternative would not provide financial support for housing mitigation to very low-, low-, and moderate-income homeowners with homes located in the floodplain or

adjacent to wetlands. Without financial assistance, these property owners may not be able to have safe, disaster resistant and affordable housing. Without financial assistance to mitigate these houses to meet local and/or county building codes, these homes would not be protected from future disaster and there would be no improvements to the floodplain. Such an alternative would pass up an opportunity to serve homeowners, neighborhoods and community residents using disaster recovery funding and would run contrary to HUD and HCD's mission of providing housing to disaster recovery victims. This alternative would not fully contribute to the long-term recovery and economic revitalization of the County. Because of these reasons, the No Action alternative was not considered viable.

Step 4: IDENTIFY POTENTIAL DIRECT AND INDIRECT IMPACTS ASSOCIATED WITH FLOODPLAIN DEVELOPMENT.

The OOM Program will have no adverse impacts that cannot be mitigated. It will not result in the development of new housing sites, as work will be conducted on developed home sites.

The natural environments of each project site will not change from its current use as a home site. The topography and existing habitats will not be altered, nor will this project introduce new hazards.

This program will have no impact on land use patterns as the program will maintain existing land uses. Many residents are very low-, low-, or moderate-income households that may not be able to afford to mitigate their homes without this program. The program will not have any adverse impact on existing deeds or leases. Only owner-occupied single-family homeowners are eligible for the program and housing mitigation must occur on the same parcel where the original house is.

Step 5: MITIGATE ADVERSE IMPACTS

HCD intends to design the proposed actions to minimize the potential adverse impacts to lives and property and preserve the beneficial values provided by floodplains and wetlands. HCD has established a resilient design for the OOM Program and will adhere to all applicable building codes and local floodplain ordinances.

Construction adjacent to wetlands will require the implementation of BMPs to prevent impacts to water quality and wetlands ecosystems. For work adjacent to wetlands, construction teams will install silt fencing and/or hay bales between the work site and wetland area to prevent impacts from soil erosion and stormwater runoff into wetland areas. Mitigation of impacts to potential wetland species will be conducted as part of the Tier 2 site-specific review of biological resources for each OOM Program site.

The Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) requires that projects receiving federal assistance and located in an area identified by FEMA as being within a Special Flood Hazard Area, such as the 100-year floodplain, be covered by flood insurance under the National

Flood Insurance Program. HCD will require proof of insurance as part of the OOM Program application process.

Step 6: RE-EVALUATE ALTERNATIVES

HCD has determined that the most practicable alternative on a programmatic level for the specified OOM Program counties is **Alternative 1: Perform home mitigation in the FFRMS floodplain but not in the floodway.** This alternative best meets the goal of the OOM Program, which includes providing safe housing for applicants while allowing the most applicants to remain in their communities, and mitigating, to the extent practicable, future hazards from flooding. This alternative also addresses the need for safe and affordable housing and provides protection of the regulatory floodway. Adverse impacts will be mitigated by performing no new development in the floodplain and allowing no Program funded work in the floodway. Design and construction will adhere to local building codes and floodplain ordinance requirements. BMPs for soil erosion, storm water management and protection of wetlands will be applied through minimum construction standards.

Alternative 2: Mitigate homes outside of and not affecting the FFRMS floodplain.

Alternative 2 was not chosen because it does not allow the maximum number of homeowners to be served by the CDBG-DR OOM program. While this option is the most protective of the FFRMS floodplain and wetland areas, it is not feasible. This option would deny aid to willing very low-, low-, and moderate-income homeowners to receive mitigation of their homes and deny opportunities to aid with actions that restore neighborhoods by preserving the quality and property value of homes. This option also does not promote HUD and HCD's disaster funding objective to help communities and neighborhoods that otherwise might not recover due to limited resources.

Alternative 3: Evaluate infrastructure action or other flood protection measures.

Alternative 3 was not chosen because, historically, these mitigation measures have proven to have mixed results in effectively protecting communities from flooding. These actions do not address the housing needs of the homeowners and, in general, are not feasible based on the limited size of most properties and are far less effective when implemented on individual scattered sites. These structures are expensive to construct and require lifelong maintenance. Furthermore, the construction of these structures oftentimes redirects the flooding problem onto other properties downstream.

Alternative 4: "No Action." Alternative 4 was not selected since a viable option (Alternative 1) is available. The No Action alternative does not fully promote HUD and HCD's objective to provide decent, safe, and sanitary housing in the areas affected by the disasters.

Step 7: ANNOUNCE AND EXPLAIN DECISION TO THE PUBLIC (NOTICE)

The Final Floodplain/Wetland Public notice was published on HCD's website on [Insert Date]. The required 10 days were allowed for final public review. Copies of the advertisements and verification of publication are provided at the end of this 8-Step analysis.

Step 8: IMPLEMENT PROPOSAL WITH APPROPRIATE MITIGATION

HCD will ensure that this plan as described above is executed and necessary language will be included in all agreements with participating parties. HCD or their consultant will take an active role in monitoring the rehabilitation/reconstruction process to ensure no unnecessary impacts occur nor unnecessary risks are taken, as individual sites are selected.

Public Notice Documents

Early Notice and Public Review of Proposed Activity in a 100-Year Floodplain and/or Wetland

To: All interested Agencies, Groups and Individuals

This is to give notice that California Department of Housing and Community Development (HCD) has determined that the following proposed action under 2023 Community Development Block Grant Disaster Recovery (CDBG-DR) – Owner Occupied Mitigation (OOM) Program under HUD Grant No. B-23-DG-06-0001 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain and/or wetland, and HCD will be identifying and evaluating practicable alternatives to locating the action within the FFRMS floodplain and/or wetlands and the potential impacts on the FFRMS floodplain and/or wetlands from the proposed action, as required by Executive Order 11988, as amended by Executive Order 13690 and Executive Order 11990, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project location is at various yet to be determined locations within Ventura County, California. The extent of the FFRMS floodplain was determined using either the Climate Informed Science Approach (CISA), the 0.2 Percent Annual Chance Floodplain Approach, or the Freeboard Value Approach.

The CDBG-DR OOM Program will provide home mitigation for very-low, low- and moderate-income households and vulnerable populations. All mitigation activities will abide by local building code requirements.

Floodplains are areas of land adjacent to rivers, ponds, lakes and the coast that flood periodically at different points in time. Under Executive Order 11988, as amended by Executive Order 13690, management of floodplains is encouraged to achieve reduction in the risk of flood loss, minimization of flood impacts on human safety, health and welfare, and restoration and preservation of the natural and beneficial floodplain values. Wetlands are those areas that are inundated by surface or ground water with a frequency sufficient to support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, wet meadows, river overflows, and mud flats. Executive Order 11990 requires protection of wetlands due to their beneficial values including providing habitat for fish, wildlife and plants, groundwater recharge, flood reduction, drinking water source and supporting cultural and recreational activities.

While the process of confirming the number of homes and locations in Ventura County is currently in progress, some of the potential applications are anticipated to be in the floodplain and/or adjacent to wetlands. The approximate acres of Federal Emergency Management Agency mapped floodplain and National Wetland Inventory (NWI) mapped wetlands Ventura County are provided in Table 1 below.

Table 1 – Information by County		
County	Acres of 500 & 100-year floodplain	Acres of NWI Wetlands
Ventura	38,998	334,640

There are three primary purposes for this notice. First, people who may be affected by activities in FFRMS floodplain and/or wetlands and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the FFRMS floodplain and/or wetlands, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about FFRMS floodplain and/or wetlands can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in FFRMS floodplain and/or wetlands, it must inform those who may be put at greater or continued risk.

Written comments must be received by HCD at the following address on or before **February XX, 2026** [a minimum 18 calendar day comment period will begin the day after the posting and end on the 19th day after the publication]: California Department of Housing and Community Development, 651 Bannan Street, Suite 400, Sacramento, CA 95811 (916) 263-6461. Attention: Stacy Rodgers. Comments may also be submitted via email at dr-enviro@hcd.ca.gov.

Date: January X, 2026

Attachment 3: Clean Air Act

Attachment 4: Coastal Zone Management

Attachment 5: Endangered Species Act

Attachment 6: Historic Preservation

Standard Operating Procedures

Tier 2 Site-Specific Cultural Resources Review

2023 Community Development Block Grant – Disaster Recovery (CDBG-DR)
Owner Occupied Mitigation (OOM) Grant Program

The California Department of Housing and Community Development (HCD) has consulted with the State Historic Preservation Office (SHPO) on potential cultural resources impacts from the 2023 OOM Program through a series of meetings and consultation letters provided in the previous 2017/2018 Owner-Occupied Housing Rehabilitation and Reconstruction (OOR) Program documents and attached to this Tier 1 Programmatic EA. The HCD OOM team has developed these standard operating procedures (SOPs) for review of Program homes for potential cultural resources impacts during Tier 2. These SOPs have been agreed upon by the SHPO and will be utilized for Tier 2 review of home sites until a potential programmatic agreement is established between HCD and the SHPO.

NEPA Review and SHPO Consultation

Environmental review of OOM Program is being conducted under the National Environmental Policy Act (NEPA) Guidelines of the U.S. Department of Housing and Urban Development (HUD). Specifically, a tiered environmental review is being conducted as defined under 40 Code of Federal Regulations (CFR) 1508.28. A broad level Tier 1 EA has been conducted by Hagerty Consulting and the Tier 2 site-specific reviews for the 2023 Program are being conducted by the construction management team's environmental contractors. As part of both stages of review, consultation has been performed with the SHPO, including several conversations and email exchanges between HCD and Shannon Pries, Supervisor, Cultural Resources Programs. A Programmatic Agreement (PA) between HCD and SHPO for disaster recovery projects has been drafted; and is currently under final review by SHPO but has not been finalized. Instead, the SHPO has provided a "Letter of Understanding" (LOU) and has directed HCD to follow the requirements of the LOU for historic resources review under the OOM Program.

Letter of Understanding

The SHPO sent a letter to HCD dated October 30, 2020 and in response to HCD's request for a LOU in a previous letter on October 28, 2020. The LOU and follow up conversations indicated that the SHPO considered the replacement of single-family mobile homes as rehabilitation projects, but the LOU requested that HCD consult with the SHPO if a rehabilitation project involves substantial earth moving, such as footing/foundation trenching, utility line excavation, or septic tanks, and the possibility exists that such earth disturbance may or will occur on or near an archeological site.

The attachment to the LOU under Threshold 1 specified that "if an application calls for work that is limited to the interior of a property (and the work will not be visible from the exterior at all) you do not need to consult the SHPO, regardless of the property's age. (Your Section 106 consultation obligations are complete)."

The attachment to the LOU under Threshold 2 specified “If an application calls for work on the exterior of a property that is less than 45- 50 years old, you do not need to consult the SHPO. (Your Section 106 consultation obligations are complete.)”

Based on the contents of the LOUs and direction from the SHPO the following SOPs were established for Tier 2 site review:

California Owner Occupied Mitigation Program

Section 106 Review Procedures

This document outlines the procedures to be undertaken to comply with Section 106 of the National Historic Preservation Act for the 2023 OOM Program in California. These programs are receiving HUD Community Development Block Grant – Disaster Recovery (CDBG-DR) funding. HCD is the Responsible Entity and assumes the HUD federal lead agency responsibilities under 24 CFR Part 58 (Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities) for the required environmental reviews in accordance with HUD regulations and guidance. The procedures outlined in this document are required, in part, because no PA exists that covers the proposed program activities.

The actions to be implemented under these programs would occur at individual residential locations where the property owner owned and occupied the home as their primary residence at the time of the qualifying disaster, the property is a single-family dwelling (such as stick built, modular, or mobile home), and the number of dwelling units on site would not increase; there are other requirements, but these are the requirements most pertinent to the Section 106 process. The proposed project activities that would occur at the individual residential locations are 1) wildfire mitigation.

The program actions would occur in Ventura County.

This document addresses the procedures for architectural resources, archaeological resources, and Native American resources.

Architectural Resources

1. If a project activity involves only interior rehabilitation or involves a manufactured housing unit, no consultation with SHPO or other Section 106 activities are required.
2. If a project activity involves a structure that is less than 45 years old and is outside of a designated historic district, no consultation with SHPO or other Section 106 activities are required. The date of construction will be determined using public property records, such as those maintained by a county assessor’s office. The structure’s age will be determined from the time of Section 106 review.
3. If a project activity involves a structure that is 45 years old or older, consultation with SHPO is required. This step must be completed by an architectural historian who meets the appropriate qualifications established by the Secretary of the Interior (SOI). The SOI-qualified architectural historian will consult with SHPO to further evaluate whether the existing structure is already listed in the National Register of Historic Places (National Register) (individually or as a contributor to a historic district) or is potentially eligible for listing in the National Register at the individual level. Consultation will include a transmittal letter and package with the following

items:

- Clear photographs of exterior of the property (proposed to include all four sides of the structure, three-quarter views of the front of the structure, and streetscape)
 - Information about the age of the property. If the date of construction is not publicly available, this can be a best guess/estimate based on style and type of property and development patterns in the area
 - A description of the work associated with the program activities (typically, mitigation within original dwelling footprint)
 - A California Department of Parks and Recreation (DPR) 523A Primary Record and DPR 523B Building, Structure, and Object Record for the property that includes only the information relevant to the undertaking
 - A summary of historic information about the property obtained from sources like local historical societies, Native American tribes, interested parties, historic preservation boards or commissions, planning departments, etc.
 - Information from historic resources surveys completed by, or for, HCD at an earlier date
 - A statement determining whether or not HCD believes the property is eligible for the National Register
4. If SHPO agrees with the determination that a property is not eligible for the National Register, no further Section 106 activities are required.
 5. If SHPO agrees with the determination that a property is eligible for the National Register, mitigation activities should be conducted in accordance with SOI's Standards for Rehabilitation, and project plans should be submitted for SHPO review.
 6. If SHPO agrees with the determination that a property is eligible for the National Register, mitigation activities would require further SHPO coordination regarding treatment and other mitigation measures.

Archaeological Resources

1. If the project activity is mitigation within original dwelling footprint, no consultation with SHPO or other Section 106 activities are required.
2. If the project activity involves substantial subsurface ground disturbance (i.e., footing/foundation trenching, utility line excavation, sewer, water, gas, leach, septic tanks, etc.), and the possibility exists that ground disturbance may or will occur on or near an archaeological site, consultation with SHPO may be required. To determine if consultation is required, an SOI-qualified archaeologist would complete the following steps.
 - Conduct a record search through the appropriate information center of the California Historical Resources Information System (CHRIS) for the disaster areas, grouping of parcels, or each of the 9 counties addressed by the OOM Programs and provide those results to SHPO.
 - Parallel to the record searches, prepare a desktop study of the archaeological context for sensitivity for areas, such as the disaster areas, grouping of parcels, or each county that the program encompasses. Background research for the desktop study can include (but is not limited to) available online historic maps and aerial photography, county general plans regarding cultural resources, local historical societies, available archaeological and historic context, ethnographic, and environmental (i.e., watersheds, geological, soils, etc.) sources. This research will be used to determine the archaeological sensitivity of an area.
 - If the project involves substantial subsurface ground disturbance, where the record search results and desktop review show no known archaeological sites within the subject parcel or

within 100 feet of the parcel, no consultation with SHPO or other Section 106 activities are required. For the same project activities, where the record search results or desktop study shows known archaeological sites within the parcel or within 100 feet of the subject parcel, consultation with SHPO is required. Consultation will include a transmittal letter and package with the following items:

- o Property address and parcel map
- o Area of potential effect
- o Clear photographs of the mitigation site
- o Summary of the record search results or desktop study and the presence or absence of archaeological resources
- o A description of the work associated with the program activities (typically any substantial earth moving activities)
- o A statement of the level of effect determination

In consultation with the SHPO, and until a PA can be established between SHPO and HCD, archaeological sensitivity models will be developed by HCD's Tier 2 environmental consulting team. This approach was decided upon due in part to the CHRIS digital data not being readily available due to some access restrictions related to the ongoing COVID-19 pandemic. The OOM Program in total encompasses thousands of individual residential parcels spread across 9 counties. SHPO and HCD agreed this program is relatively unique as it only enables privately owned residential parcels to protect existing housing from future wildfires. The agencies recognize that the delays, particularly acute due to current COVID restrictions, in obtaining third-party CHRIS data from such widely distributed impacted areas would result in hardship to impacted California citizens simply trying to mitigate their homes. The use of archaeological sensitivity models and mapping was therefore deemed to be a reasonable alternative.

The archaeological sensitivity models therefore are focused solely on identifying landforms where significant (NRHP-eligible) undisturbed prehistoric Native American sites could potentially be located. Each individual application parcel will be submitted to SHPO under a consultation package where the factors identified in the archaeological models will be analyzed in relation to its site-specific characteristics. Archaeological model criteria to be applied in each model will include soil type and drainage characteristics; distance from a water source and type of water source; distance from wetlands and type of wetlands; land slope; and aspect (facing direction).

Native American Resources

This SOP provides the procedures through which the HCD / Responsible Entity (RE), shall conduct Tribal consultation for CDBG-DR/MIT funded-programs for the term of this Agreement. Each HCD program shall require separate consultation with the Tribes.

NOTE: Whenever a contacted Native American Tribe raises a concern about a CDBG-DR/MIT funded program or specific Undertaking, HCD shall, if not already the Responsible Entity, assume that role with respect to further consultation with that Tribe.

Step 1. Identify tribes with affiliation to and interest in the project area and initiate consultation.

The RE will use various methods to identify Tribes with a current or ancestral interest in the counties where the project(s) are located. Tribes may have an interest in counties far from their current location, counties where the Tribe lived centuries or millennia ago, as defined by each Tribe individually.

a. Tribal Directory Assessment Tool (TDAT)

TDAT is a web-based directory of federally-recognized Tribes and their geographic areas of interest. Type the project addresses into the locator box in TDAT and it will return a list of Tribes with interest in the area, with contact names, addresses, e-mail addresses, fax numbers and phone numbers.

b. Native American Heritage Commission (NAHC)

The California Native American Heritage Commission is a California Agency founded as the primary government agency responsible for identifying and cataloging Native American cultural resources. Fill out The Local Government Tribal Consultation List Request and a template letter to accompany the form request. The form and letter will be reviewed and sent to NAHC by the RE at nahc@nahc.ca.gov. This list will be compared to the information gathered from TDAT and any Tribes not listed in TDAT will be added to the consultation list.

c. The California Indian Assistance Program (CIAP)

The California Indian Assistance Program (CIAP) is an HCD program established in 2019 by Assembly Bill (AB) 1010 to provide comprehensive technical assistance to Tribes, Tribally Designated Housing Entities, and Tribal partners in the funding of affordable housing in California. The RE will send a general inquiry email to ciap.hcd.ca.gov requesting a list of Tribes in the ReCoverCA program counties. Any Tribes identified by CIAP not listed in TDAT or NAHC lists will be added to the consultation list.

d. Non-federally Recognized Tribes

Although REs are only required to consult with federally-recognized Tribes, HCD will invite non-federally recognized Tribes with a demonstrated interest in the project area to consult as additional consulting parties. Non federally recognized Tribes will be consulted with following the same consulting process as federally recognized Tribes, as outlined in this document.

e. Contact Tribe(s) and invite consultation.

Once the RE has identified Tribes with a potential interest in the project area and consolidated the three lists as outlined above, the RE mails a letter to each Tribe to invite consultation at both the county wide (Tier 1) level as well as the site specific (Tier 2) / individual project level. The letter(s), on RE letterhead, may instead be transmitted by email. HCD shall keep a copy of the letter(s) in the Environmental Review Record (ERR) for monitoring purposes.

For each program involving a Tier 1 level and for all standalone multifamily or infrastructure projects, a follow up phone call will be made to each Tribe to ensure they received the invitation to consult. If HCD is unable to reach the Tribe via phone, HCD will make a total of 3 contact attempts inviting the Tribe to consult. If the phone number provided by TDAT, NAHC and CIAP lists are invalid, HCD will make a reasonable effort to find a replacement phone number and conduct the phone calls with an updated number. If unable to contact the

Tribe via phone number, and no email response has been provided by the Tribe, a follow up email will be sent inviting each Tribe to consult.

f. Historic Properties of Religious and Cultural Significance

The letter that invites consultation will contain a request for assistance in identifying historic properties of religious and cultural significance in the project area - archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places or landscapes, and buildings or structures with significant Tribal association - and any initial concerns with impacts by the project on those resources.

g. Tribal Historic Preservation Officer (THPO)

Some Tribes have both a Tribal leader and a Tribal Historic Preservation Officer (THPO). The RE shall send letters to both and ask that the Tribe's response indicate who should be the RE's main point of contact, if possible. On Tribal lands, a THPO may have assumed authority for Section 106 review in lieu of the State Historic Preservation Officer (SHPO). On non-Tribal lands, the THPO may have been delegated by the Tribe to represent them in Section 106 reviews, but the tribal leader will also be included in the correspondence.

h. Outreach Letter

The RE will ensure a description of the project is included in the letter. The description shall include, as applicable: the location and size of the property; type of project; type and scale of new building(s) or structures; number of housing units; and the anticipated depth and area of ground disturbance. For scattered single family residential disaster recovery sites, much of this information will not be available at the county wide, Tier 1 consultation level. An invitation to opt out to the site specific, Tier 2 consultation will be included in the Tier 1 outreach letter. HCD shall include direct Area of Potential Effect (APE) in Tier 2 site specific letters, however indirect APE will be defined through a combination of the architectural analysis as well as any traditional cultural landscapes or individual historic properties that a Tribe identifies.

The RE -- not a contractor, lender, sponsor, sub-recipient or other grantee -- must sign the letter and send it to the Tribe(s). The RE is required to conduct government-to-government consultation.

i. Map

Except for county-level Tier 1 letters where no specific project locations have been defined, all outreach letters shall include a map showing the location of the project(s) at a scale that shows clearly its location.

j. Timeframes

HCD's policy is to request a response to the invitation to consult within 45 days from the date after the letter is received by the Tribe, which is greater than the 30-day period outlined in the National Historic Preservation Act. For gauging the beginning and end of the 45-day period, the RE shall send the request during normal workdays and hours and may assume that an emailed letter is received on the date it is sent. For a hard copy letter, the RE may send the letter by certified mail, or if certified mail is unavailable and mail delivery is predictable and

reliable, the RE may assume a 5-day delivery period and assume that the response period ends 50 days after the letter is mailed.

If a Tribe wishes to be a consulting party, the Tribe must respond within 45 days with an indication of their desire to consult. The Tribe does not need to actually provide specific information about historic properties of cultural significance within 45 days; that can be determined through the Step 2 process, below. If a Tribe responds that they do not want to consult on a particular program or project, the RE shall document the response in the program ERR. If a Tribe does not respond to the invitation to consult within 45 days, the RE can document the invitation and lack of response in the ERR; further consultation is not required. If a Tribe responds after the 45-day period, HCD will proceed with further consultation as if the response was received within 45 days.

Step 2. Consult with Tribe(s) if any concerns are raised during Step 1.

If the RE receives a response from the above outreach stating a concern with the proposed program / project and its potential effects on a tribal cultural property, the processes outline here shall be followed. If the RE involved is not HCD itself, the RE is required to notify HCD so that the agency can become directly involved at this stage.

a. Consultation Meeting(s)

After receiving a response that a Tribe wants to consult, the RE will contact the Tribe(s) to arrange further consultation which may take place by phone, web meeting, or face-to-face meeting. The RE shall accommodate a Tribe's preferences as to meeting location and method of communication where able to do so. If more than one Tribe wants to consult, the RE shall consult jointly if possible but separately if a Tribe wishes it. The RE shall integrate tribal consultation with other non-tribal parties, including the SHPO, as possible and appropriate.

b. Confidentiality of Information

The RE recognizes that some Tribes may not want to consult jointly, particularly where there are concerns for confidentiality of information. Tribes may also be hesitant to share information on the location, character, and use of historic properties of special religious and cultural significance. The RE shall discuss with the Tribe(s) ways to protect confidentiality of such information.

c. Identify tribal concern about project.

At the consultation meeting, the RE shall hear the Tribe(s) concerns about the project in order to understand the nature of those concerns and to provide any additional information about the project that the tribal representatives request so they can better understand it. The goal will be to identify the section 106 determination such as "No Historic Properties Affected," "No Adverse Effect," or "Adverse Effect" findings that the Tribes may deem appropriate for the undertaking.

Step 3. Consult to resolve adverse effects if identified during Step 2.

If Tribes state their knowledge that the project will result in an direct, indirect, and/or cumulative adverse effect on their identified historic property / PTRCI, the HCD shall work with the

Tribe(s), SHPO and other consulting parties as appropriate to consider alternatives that would avoid or minimize these effects, including possible design changes, additional studies, monitoring, etc. If no agreement on the adverse effect resolution is possible, HCD shall identify whether the project remains viable or if the disagreement is to be sent to the Advisory Council on Historic Preservation including the Office of Tribal and Indigenous Peoples (OTIP) for their input.

Notification of Unanticipated Discoveries During Construction

If previously unknown below ground historic properties / PTRCIs of Native American origin are unearthed during project construction (e.g., stone tools or waste flakes, ceramic sherds), construction at that part of the property will immediately stop until tribal consultation can occur. The HCD will notify all Tribes contacted in Step 2, above, and re-enter consultation following the procedures outline in **ARTICLE VI.A.7** of the programmatic agreement. If the unanticipated discoveries during construction are determined to be human remains, they should be respectfully covered over and secured. If law enforcement determines the remains are not a recent crime, HCD shall make extraordinary efforts to ensure the Tribe(s) are contacted to re-open consultation on the discoveries.

Attachment 7: Wild and Scenic Rivers

Attachment 8: Site Specific or Tier 2 Reviews

Attachment 8: Site-Specific or Tier 2 Reviews

Update this document as site-specific reviews are completed. Complete each site-specific review according to the written strategies outlined in the broad-level review and attach it in the environmental review record.

[illegible]