



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Initial Consultation for Community Development Block Grant - Disaster Recovery (CDBG-DR)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document, which was sent to us in email on March 22, 2023, from U.S. Department of Housing and Urban Development (HUD) to support long-term recovery efforts on Owner-Occupied Housing Mitigation (OOM) Program following federally declared disasters during late 2020.

It is our understanding that the OOM Program is currently undergoing a tiered National Environmental Policy Act (NEPA) Environmental Assessment due to the use of federal funds. Although the OOM Program is similar to HCD's Owner-Occupied Rehabilitation and Reconstruction (OOR) Program, there is a key difference between the two. Specifically, the OOR Program provides assistance with the reconstruction and rehabilitation of single-family homes destroyed by a disaster. On the other hand, the OOM Program provides funding to homeowners to apply wildfire mitigation features to their homes.

The OOM Program has been determined to be exempt under CEQA per categorical exemption 15302 (replacement or reconstruction). As specified in the HCD's Community Development Block Grant Action Plan 2020, it is estimated that around 500 homeowners may seek funding through this program based on the best currently available data. The review of individual project sites will be conducted as part of Tier 2 once those sites are identified. HUD anticipates that the actions of the OOM program will conform to our State Implementation Plan (SIP) because they are not anticipated to cause or contribute to a new violation of any existing standard, not increase the frequency or severity of any existing violation of any standard; or not delay timely attainment of any standard. In addition, HUD committed this OOM program will comply with any local regulations, including those applying to lead-based paint and asbestos abatement activities. HCD will also employ mitigation measures, such as dust suppression, covering haul loads, vehicle idling reduction, and spill mitigation measures, as best management.

Please send a copy of any follow-up updates on this OOM Program and actions when they become available. South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Actions in OOM Program are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

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Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

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