



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 October 21, 2022 from U.S. Department of Housing and Urban Development (HUD) to support long-term recovery efforts on Owner-Occupied Rehabilitation/Reconstruction (OOR) Program following federally declared disasters during late 2020.

It is our understanding that OOR Program is being evaluated programmatically under a tiered National Environmental Policy Act (NEPA) Environmental Assessment because of the use of federal funds. The Program has been determined to be exempt under CEQA per categorical exemption 15302 (replacement or reconstruction). The number of homes to be rebuilt in Los Angeles County is currently unknown as income-qualified homeowners will apply to the Program at a later date. HUD anticipates that the actions of the OOR 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. Also, HUD committed this OOR 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 OOR 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 OOR 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

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

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