

Public Action Plan

2022 DRGR Public Action Plan



ABSTRACT

Action Plan for Program Administrative Costs

The amount budgeted for ADECA's program administrative costs includes anticipated expenditures of grant funds for ADECA's staff to work on this program. These funds include staff salaries (direct and indirect costs), travel, equipment, supplies, and other necessary and proper uses of funds as needed for management and oversight of the grant program. Staff work includes, but is not limited to, drafting the State's plans and any substantial amendment(s); drafting and publishing public notices of public hearings, plans, and notices of funds availability in statewide newspapers and online on ADECA's Disaster Program webpage; conducting public hearings and public comment periods for said plans; conducting training workshops that include grant application and compliance requirements; providing technical assistance to subgrant recipients; processing grant award documents and requests for payment of grant funds; monitoring local projects for program compliance; closing out open grants; maintaining records per ADECA's Records Disposition Authority requirements; drafting and submitting quarterly progress reports to HUD; and participating in federal monitoring visits conducted by HUD.

Recognizing the magnitude of the grant allocation, ADECA heretofore recognizes the need of a national consulting firm experienced in assisting States and communities with the development and implementation of disaster recovery grants. This is more so true with the February 3, 2022 Federal Register's Consolidated Notice that has created additional requirements, many of which are technical in nature. Thus, to ensure that this disaster recovery and mitigation grant is properly and timely implemented, ADECA is setting aside a significant amount of this grant's funds for such consultant contractual purposes.

Public Action Plan for Hurricanes Sally and Zeta

Toward the end of 2020, as the State of Alabama was dealing with the impacts of the COVID-19 global pandemic, two hurricanes—Sally and Zeta—struck the southern and central parts of the state, causing substantial damage to the state's infrastructure, economy, and housing supply.

Hurricane Sally, which made landfall as a strong Category 2 hurricane near Gulf Shores September 16, 2020, produced widespread wind, storm surge, and freshwater flooding across coastal Alabama, and was directly responsible for three deaths.

Around five weeks after Hurricane Sally made landfall in Alabama, strong winds from Hurricane Zeta caused extensive damage in the southern and central parts of the state, which led to around 400,000 residents losing power at one point during the event.

HUD identified four Hurricane Sally and Zeta-impacted counties as the Most Impacted and Distressed (MID) areas in Alabama—Baldwin, Clarke, Escambia, and Mobile. The state subsequently identified five others—Dallas, Marengo, Perry, Washington, and Wilcox—that qualify as MID areas.

The recovery programs in this action plan are proposed to not only assist in the long-term recovery of those HUD- and state-identified MID areas, but to mitigate the impact of future disasters, while also meeting CDBG program objectives such as advancing equity, and prioritizing vulnerable populations, protected classes, and underserved communities in those areas.

The state completed an Impact and Unmet Needs Assessment, a Mitigation Needs Assessment, held multiple public hearings, and conducted other outreach and engagement activities to determine where the greatest unmet need remains and the types of recovery activities the state should prioritize.

In accordance with HUD guidance, this action plan prioritizes housing recovery, but also allocates dollars toward infrastructure, economic revitalization, planning, and administration activities.

AMENDMENTS

Non-Substantial Amendment 1 04/21/2023

No changes were made to the narrative of the Public Action Plan but we did remove two Grantee Programs that we decided were unnecessary.

Initial 01/12/2023

Submission of The State of Alabama CDBG-DR Action Plan

TABLE OF CONTENTS

[1. Executive Summary](#)

[Overview](#)

[Disaster Specific Overview](#)

[Summary](#)

[Unmet Need and Proposed Allocation](#)

[2. Unmet Needs Assessment](#)

[Overview](#)

- [a. Housing Unmet Need](#)
 - [Disaster Damage and Impacts](#)
 - [\(1\) Single Family v. Multi-Family Needs; Owner Occupied v. Tenant](#)
 - [\(2\) Public Housing and Affordable Housing](#)
 - [Public Housing Authorities Damaged](#)
 - [Fair Housing, Civil Rights Data and Advancing Equity](#)
 - [Grantee Demographics and Disaster Impacted Populations](#)
 - [Income Demographics](#)
 - [Income Demographics - Low Income](#)
 - [LMI Analysis - Overall](#)
 - [LMI Analysis - Federally Declared Disaster Areas](#)
 - [Limited English Proficiency Breakdown of Disaster-Related Areas](#)
 - [Point-in-Time Count - Impacted by Disaster](#)
- [b. Infrastructure Unmet Need](#)
 - [Disaster Damage and Impacts - Infrastructure](#)
- [c. Economic Revitalization Unmet Need](#)
 - [Disaster Damage and Impacts - Economic Revitalization](#)
- [d. Mitigation Only Activities](#)

[3. General Requirements](#)

- [a. Citizen Participation](#)
 - [Outreach and Engagement](#)
 - [Public hearings](#)
 - [Complaints](#)
 - [b. Public Website](#)
 - [c. Amendments](#)
 - [Substantial Amendment](#)
 - [Non-Substantial Amendment](#)
 - [d. Displacement of Persons and Other Entities](#)
 - [e. Protection of People and Property](#)
 - [Elevation standards](#)
 - [Flood Insurance Requirements](#)
 - [Construction Standards](#)
 - [Contractors Standards](#)
 - [Preparedness, Mitigation and Resiliency](#)
 - [Broadband Infrastructure in Housing](#)
 - [Cost-Effectiveness](#)
 - [Duplication of Benefits](#)

[4. Grantee Proposed Use of Funds](#)

- [Overview](#)
 - [a. Program Budget](#)
 - [Connection to Unmet Needs](#)
 - [Leveraging Funds](#)
 - [Program Partners](#)
 - [Distribution of Funds](#)
 - [Program Income](#)
 - [Resale or Recapture](#)
 - [b. Program Details](#)
 - [Housing Program\(s\)](#)
 - [Buyout Program\(s\)](#)
 - [Infrastructure Program\(s\)](#)
 - [Economic Revitalization Program\(s\)](#)
 - [Public Facilities Program\(s\)](#)
 - [Public Services Program\(s\)](#)
 - [Mitigation Program\(s\)](#)

[5. Appendix](#)

- [a. Certifications](#)
- [b. Waivers \(if applicable\)](#)
- [c. Summary and Response of Public Comments](#)
- [d. Data Sources/Methodologies](#)
- [e. Important Definitions and Terms](#)
- [f. Standard Form 424](#)

1. Executive Summary

Overview. The U.S. Department of Housing and Urban Development (HUD) announced that the State of *Alabama* will receive \$501,252,000 in funding to support long-term recovery efforts following *Hurricane Sally and Zeta* through the *Alabama Department of Economic and Community Affairs (ADECA)*. Community Development Block Grant- Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in *Alabama; (Baldwin, Mobile, Escamiba and Clarke counties (HUD identified MIDs) and additional state identified MIDs Dallas, Washington, Wilcox, Marengo, and Perry Counties)*.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$ 501,252,000 in CDBG-DR funds to the *State of Alabama* in response to *Hurricane Sally and Zeta, 4563 & 4573*, through the publication of the Federal Register, 87 FR 31636 May 24, 2022. This allocation was made available through [Public Law 117-43](#).

Disaster Specific Overview.

Alabama was impacted by two major disasters in 2020: Hurricane Sally (DR-4563) and Hurricane Zeta (DR-4573). These storms resulted in 35 counties presidentially declared for FEMA Public Assistance, of which, 9 counties were also declared for FEMA Individual Assistance. On Wednesday, September 16, 2020, Hurricane Sally made landfall near Gulf Shores, Alabama, as a Category 2 hurricane with torrential rainfall, powerful storm surge and maximum sustained winds of 105 mph. Flooding rainfall spread heavy rain inland into parts of Georgia, the Carolinas and as far north as Virginia. The storm tore through buildings, flooded neighborhoods, submerged homes, and reports indicate that nearly 400,000 residents were left without power in Mobile and Baldwin Counties. Hurricane Sally is estimated to have caused approximately \$311.9 million in damage in Alabama, according to National Centers for Environmental Information, and was directly responsible for three deaths, one of them an apparent drowning that occurred in Orange Beach and another that occurred in the Foley area as a result of storm cleanup.

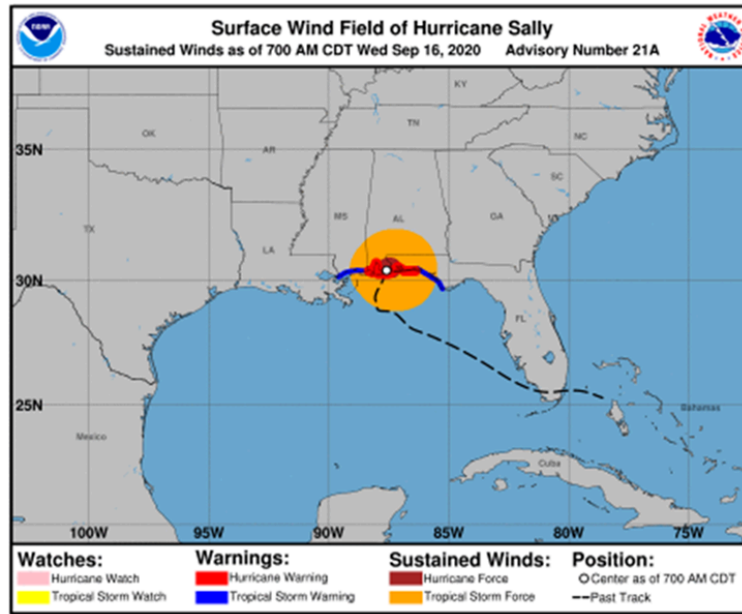


Figure 1: Surface Wind Field of Hurricane Sally, Courtesy of NOAA

Hurricane Sally began as Tropical Depression Nineteen just off the coast of South Florida on September 11th and strengthened to Tropical Storm Sally over the Gulf of Mexico just off the southwest coast of Florida on September 12th. The following day Sally moved northward over the eastern Gulf of Mexico. Just before noon on September 14th it intensified into a hurricane while centered approximately 165 miles southeast of Biloxi, Mississippi. Hurricane Sally then slowed to a crawl making it hard to forecast when and where exactly it would go. Sally finally developed a small inner core, strengthening it to a Category 2 hurricane before making landfall. Hurricane Sally dumped as much as 30 inches of rain in southern Alabama and the Florida Panhandle before downgrading to a tropical storm with maximum sustained winds of 70mph. It continued to weaken to a post-tropical depression Thursday, September 17th, as it moved northeast and dropped heavy rain in the Carolinas. This was the first hurricane to hit Alabama since Hurricane Ivan in 2004, coincidentally on the same date and in the same location.

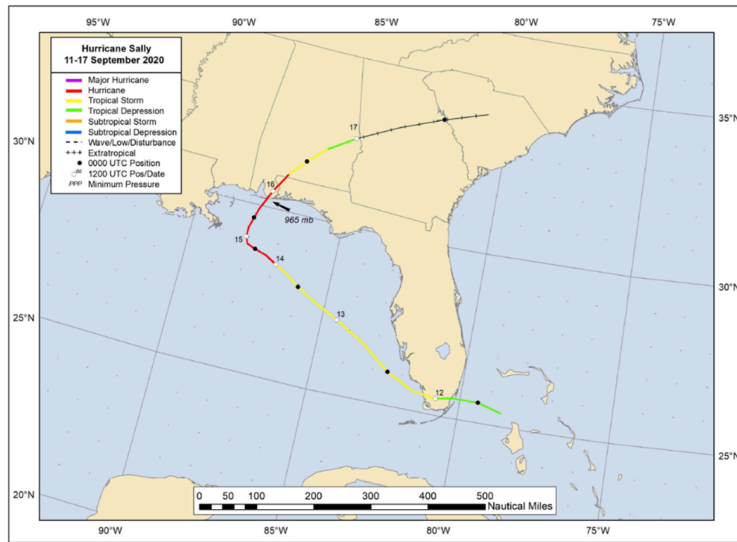


Figure 2: Best track positions for Hurricane Sally, 11–17 September 2020. The extratropical track over the United States is partially based on analyses from the NOAA Weather Prediction Center.

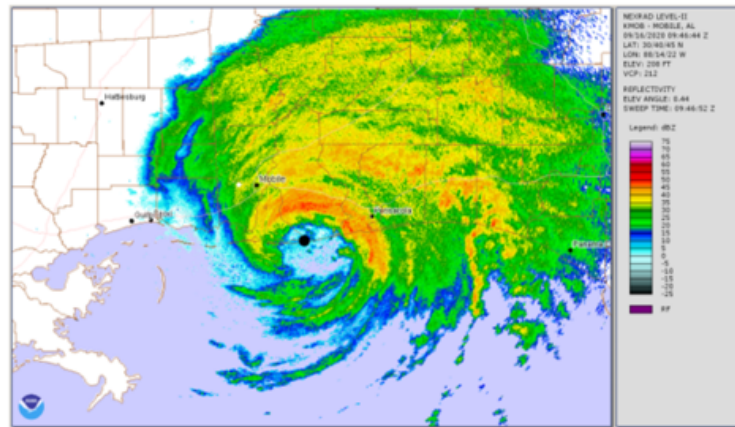


Figure 3: Radar reflectivity from the National Weather Service WSR-88D radar in Mobile, Alabama, at 0946 UTC 16 September, around the time of Sally’s landfall at Gulf Shores, Alabama. At the time, Sally’s center (denoted by the black dot) was located on the northwestern side of the eye.

The hardest hit area in Alabama was Orange Beach, where one death occurred due to drowning. Widespread damage and power outages were reported in Gulf Shores, Orange Beach, Dauphin Island and along the Alabama, Mississippi, and Florida coasts. People were seen kayaking down a flooded street in Gulf Shores, Alabama. There was a range of damage that occurred due to this storm including the wall of a residential high-rise building that was ripped completely off, leaving multiple levels of bedrooms exposed. One of the most unique casualties occurred in Mobile, Alabama, where winds toppled the spire of a church causing it to crash onto the church roof, where luckily no one was harmed. Due to the heavy flooding and power outages, at the time of the storm it was reported that Mobile and Baldwin Counties experienced almost 12,000 gallons of sewage overflow. Additionally, many farmer’s fields suffered due to the strong winds and flooding which destroyed crops leaving many farmers across the state without hopes for successful harvest. The agricultural industry was already suffering due to impacts from the COVID-19 pandemic. These are just some examples of destruction left in the wake of Hurricane Sally.



Figure 4: Fallen steeple at El Primitive Baptist Church, Mobile, Alabama Image courtesy of Armondo Moralez (Alabama church steeple toppled as Sally tears through Mobile | Fox News) <https://www.foxnews.com/us/alabama-church-steeple-toppled-sally-mobile>

Figure 5: Tropic Isles condominiums are seen after Hurricane Sally moved through the area, Sept.16, in Orange Beach, Alabama Image courtesy of Gerald Herbert Alabama

Hurricane Zeta struck downtown Mobile, Alabama on October 28 and 29 of 2020, only about a month after Hurricane Sally hit the same area. Hurricane Zeta made landfall as a Category 2 with 110 mph winds Wednesday in southeast Louisiana then moved northeast into southwest Alabama late Wednesday night. These strong winds caused widespread tree and power line damage. On October 28th Alabama Power reported at least 494,000 outages across the state. Rainfall totals were generally in the 2-5 inches range. Hurricane Zeta is estimated to have caused approximately \$840 million in damage across the state, according to National Centers for Environmental Information, and was responsible for six total deaths, one in Clarke County, Alabama while the five others occurred across the southeast.

Figure 6: Rainfall accumulations, Image courtesy of David Roth at the NOAA Weather Prediction Center

Prior to hitting Alabama, Zeta developed over the Western Caribbean Sea on October 24, 2020, as a tropical storm and slowly moved west, impacting portions of the Yucatan Peninsula in the southern Gulf of Mexico then turning northwest becoming a hurricane on Wednesday, October 28th. The hurricane's eye moved directly over New Orleans a few hours after landfall, with the center crossing into southern Mississippi that night and moving across southwestern Alabama early the next day, bringing strong winds well inland. Zeta weakened to a tropical storm just south of Tuscaloosa, Alabama early on October 29th and then raced northeastward across northern Georgia and the southern Appalachian Mountains. The storm transitioned into a post-tropical cyclone over central Virginia and continued moving rapidly northeastward dissipating over the western Atlantic Ocean a couple of hundred miles east of Atlantic City, New Jersey. This was a fast-moving storm, within 24 hours Zeta travelled 1,300 miles before fading away.

Figure 7: National Weather Services, Hurricane Zeta Best Track Positions, 24-29 October 2020

The damage left as a result of Hurricane Zeta impacted a wide area, most of which was still recovering from Hurricane Sally which made landfall the month prior. Dauphin Island experienced major flooding, including to their fire station which was flooded inside and out. Most of the damage was a result of the strong winds that were up to or over 90 miles per hour reported in Mobile, Washington, Clarke, Greene, and Wilcox counties. These powerful winds extended from Mobile County in South Alabama to Calhoun and Cleburne counties in Northeast Alabama and caused a slew of damage including power outages for almost 500,000 people. The wind also blew metal off buildings and knocked down trees which had ripple effects causing a wide range of damage. This damage included broken waterlines, damaged cars, downed powerlines, fences, and signs. The most devastating of the losses was the death caused as a result of a tree crashing on top of a mobile home.

Figure 8: Flooding in Gulf Shores, AL Hwy 59 <https://www.cbs42.com/alabama-news/zeta-storm-surge-and-flooding-in-gulf-shores/>

Figure 9: Structural Damage in Goodwater, AL <https://www.al.com/news/2020/10/hurricane-zeta-latest-photos-videos-of-damage.html>

As recovery efforts continued throughout the impacted areas, concerns of Hurricane Zeta focused on the lack of experience some of the affected counties had with hurricanes. Typically, hurricane recovery operations are more likely to occur in coastal Alabama counties such as Mobile and Baldwin counties which were still recovering from the massive damage brought about by Hurricane Sally when Hurricane Zeta hit. However, heavy tree damage and massive power outages extended north to Citronelle, which had not dealt with major damage from a hurricane since at least Hurricane Frederic in 1979.

Summary.

In the May 24th, 2022, and February 3rd, 2022, Federal Register allocation notices ([87 FR 6364](#) and [87 FR 31636](#), respectively), Section II, Use of Funds, states: “The Appropriations Act requires that prior to the obligation of CDBG-DR funds by the Secretary, a grantee shall submit a plan to HUD for approval detailing the use of funds. The plan must include the criteria for eligibility, and how the use of these funds will address long-term recovery and restoration of infrastructure and housing, economic revitalization, and mitigation in the MID areas.” ADECA is the administering agency for these recovery funds. Additionally, all CDBG-DR funded activities must clearly address the impact of the disaster for which funding was allocated. This means each activity must:

- Be a CDBG eligible activity (or be eligible under a waiver or alternative requirement in applicable Federal Register Notices),
- Meet a National Objective, and
- Address a direct or indirect impact from the major disaster in a Presidentially declared county.

In compliance with these requirements outlined in the Federal Register, ADECA has developed this 2022 State Action Plan for Disaster Recovery (the “Action Plan”) to describe how the allocated funding will be administered to address long-term recovery needs in the HUD- and State-identified MID areas in a way that is compliant with all federal, state, and local regulations.

The programs and method of distribution outlined in this Action Plan are supported by the findings of the unmet needs assessment, included in this document, along with results of outreach and collaboration with local community stakeholders in the areas impacted by Hurricanes Sally and Zeta. These sources helped determine the remaining unmet needs in local affected communities, as required by HUD. Based on the Unmet Needs Assessment, the largest portion of unmet needs resulting from the covered storms is related to housing recovery. The State has calculated a total unmet need of \$770,193,957 as a result of Hurricane Sally and Hurricane Zeta.

The proposed allocation of funding described in this Action Plan includes activities for the administration and planning of recovery programs, housing, infrastructure, and economic revitalization, and other CDBG-DR eligible activities, as needed. The programs and method of distribution proposed are wide ranging and include a State-administered single-family housing recovery program, a formula allocation, and a competitive allocation to address as much unmet need as possible with an emphasis on local participation, outreach, and impact to the most vulnerable and hard to reach populations impacted by the hurricanes.

Unmet Need and Proposed Allocation

| Category | Remaining Unmet Need | % of Unmet Need | Program Allocation Amount | % of Program Allocation |
|-------------------------|-------------------------|-----------------|---------------------------|-------------------------|
| Administration | \$0.00 | 0.00% | \$25,062,600.00 | 5.00% |
| Planning | \$0.00 | 0.00% | \$20,050,080.00 | 4.00% |
| Housing | \$711,920,934.00 | 92.43% | \$364,911,456.00 | 72.80% |
| Infrastructure | \$13,508,011.00 | 1.75% | \$68,420,898.00 | 13.65% |
| Economic Revitalization | \$44,765,011.00 | 5.81% | \$22,806,966.00 | 4.55% |
| Public Services | \$0.00 | 0.00% | \$0.00 | 0.00% |
| Mitigation | \$0.00 | 0.00% | \$0.00 | 0.00% |
| Total | \$770,193,956.00 | 100.00% | \$501,252,000.00 | 100.00% |

Data Source(s): Federal Emergency Management Agency (FEMA) U.S. Department of Housing and Urban Development (HUD), U.S. Small Business Administration (SBA), U.S. Census Bureau (Census), and Zillow Home Value Estimates

* Allocation Amount includes project delivery costs and does not include administration and planning costs.

2. Unmet Needs Assessment

Overview.

ADECA has identified over \$770 million in remaining unmet disaster recovery needs resulting from impacts of Hurricanes Sally and Zeta. The table below provides the overall unmet need and disaster impacts of Hurricanes Sally and Zeta, by sector. To determine unmet needs, ADECA used a methodology described in further detail in Section 4.3 of this Action Plan.

ADECA has completed the following unmet needs assessment in accordance with the latest HUD guidance by analyzing the best available state and federal data sources as of July 6, 2022, including but not limited to the Federal Emergency Management Agency (FEMA), U.S. Department of Housing and Urban Development (HUD), U.S. Small Business Administration (SBA), U.S. Census Bureau (Census), and Zillow Home Value Estimates to identify needs and align priorities in response to impacts from Hurricanes Sally (2020) and Zeta (2020).

On September 16, 2020, Hurricane Sally made landfall in Baldwin County, Alabama causing hurricane-force winds, storm surges, heavy rainfall, and freshwater flooding. Southern Alabama experienced maximum sustained winds of approximately 110 mph, storm surge flooding measuring between 5 to 7 feet above ground level (AGL), rainfall measuring between 1-2.5 feet, and record-breaking freshwater flooding. Sally's highest recorded rainfall total was in Orange Beach, Alabama, at 29.99 inches.

Mobile and Baldwin counties reported damage to trees, power lines, homes, and buildings. Over 275,000 households and businesses and nearly all of Baldwin and Escambia counties lost power during the storm. Heavy rainfall and flash flooding damaged roads and bridges in Escambia and Coffee Counties.

Hurricane Zeta reached southwestern Alabama as a tropical storm on October 29, 2020.^[1] Peak sustained winds of 53 kt were measured at Buccaneer Yacht Club in Mobile Bay, Mobile and peak gusts at 79 kt were measured near the same time at Mobile Regional Airport. A maximum water level of 6.9 ft Mean Higher High Water (MHHW) was measured at Bayou La Batre Bridge in Alabama, and high-water marks up to 8ft were found in Coden, possibly due to wave action on top of the storm surge. Remnants of debris lines up to 7 ft above ground level (AGL) were found in Daphne and Spanish Fort due to waves atop the storm surge as well. Peak rainfall within the State of Alabama measured at 4.26 inches in Woodville.

Zeta hit Mobile and Baldwin Counties the hardest, with damages to power lines and poles resulting in loss of power to over 400,000 customers, downed trees creating roof and structural damage to homes, flooding on U.S. Highway 90 Causeway in Baldwin County, and flooding throughout Downtown Mobile.

HUD identified Most Impacted and Distressed (MID) Counties

- Baldwin, Mobile, and Escambia Counties; 36545 (Clarke County)

State identified Most Impacted and Distressed (MID) Counties

- Clarke, Dallas, Marengo Perry, Washington, Wilcox Counties

[\[1\] https://www.nhc.noaa.gov/data/tcr/AL282020_Zeta.pdf](https://www.nhc.noaa.gov/data/tcr/AL282020_Zeta.pdf)

a. Housing Unmet Need

Disaster Damage and Impacts.

To provide insight into the pre-storm housing conditions in Alabama, ADECA reviewed its FY2020-2024 Five-Year Consolidated Plan. According to this analysis, ADECA found that a significant number of households across the entire State are in need of some type of housing assistance, with measurable representation of those households with the lowest incomes.

Housing needs are similar between owner and renter households. Across all age and racial groups, both groups experience some level of housing cost burden. Of the 2,231,126 housing units in Alabama in 2017, over 83% were occupied with a median annual income of \$46,742. According to the 2010 Census, nearly 130,000 households had incomes of less than 30% of the area median income, which translated into a housing cost burden of 50% or more. Although the housing needs were similar between owners and renters, renters represented approximately 60% of the cost burdened households in Alabama.

Over two-thirds of Alabama's housing stock is owner-occupied. Overall home prices are below the national average, but ADECA notes that homeownership can still be too costly for many households to achieve. Most owner-occupied homes in Alabama are single-family, detached homes, followed by mobile homes. Owner-occupied households without a mortgage had a cost burden rate of 6.4% and a severe cost burden rate of 4.6%. Owner-occupied households with a mortgage had a cost burden rate of 14.6%, and severe cost burden at 10.2%; 20% of renters were cost burdened, and 17.8% percent were severely cost burdened.
[\[1\]](#)

Prior to Hurricane's Sally and Zeta, Alabama was experiencing a shortage of available and affordable rental homes for extremely low-income households. Extremely low-income (ELI) is defined as those households whose income is at or below thirty percent (30%) of their area median income. According to the 2020 5-Year ACS Public Use Microdata Sample (PUMS), 181,179 renter households across Alabama are considered extremely low income with a shortage of 76,023 rental homes needed at that point in time. The maximum income reported in this sample was \$26,200 annually for a 4-person family in Alabama. Sixty-seven percent (67%) of extremely low-income renter households were also considered to be experiencing severe housing cost burden, defined as spending more

than half of their income on housing. Studies have shown that those who are severely cost burdened are more likely to experience unstable housing situations as they sacrifice other necessities such as healthy food and healthcare in order to pay their rents.^[2] The COVID-19 pandemic further complicated the affordable housing issue in Alabama, creating additional impediments to renters' ability to pay their rent.

This assessment will detail the ninety-two percent (92%) of unmet needs that have been identified in housing and the programs created will detail how this Action Plan will address these issues.

The State has determined a total unmet housing need of \$711,920,934. This dollar value was determined by first estimating initial impact to housing at \$706,811,201. The initial impact was multiplied by 1.15 to account for a 15% cost increase associated with added resilience measures, economic impact of the COVID-19 pandemic, and general inflation, to give an estimated cost of impacts with resilience measures of \$812,832,881. The amount of available housing recovery funding, \$100,911,947 was then subtracted from the total estimated impact, resulting in the unmet need amount of \$711,920,934. Table 2 and Table 5 below outlines the high-level and detailed housing unmet needs calculation.

Unmet Needs Assessment Methodology

HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. FEMA IA data is useful for damage assessment values; however, there are limitations associated with this data source due to how FEMA assesses damage and because data can be difficult to obtain after a major disaster event. Due to the limitations and lack of availability of this data, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home. Generally, this is accomplished by "using the average real property damage repair costs determined by the Small Business Administration (SBA) for its disaster loan program for the subset of homes inspected by both SBA and FEMA. Because SBA is inspecting for full repair costs, it is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable"^[3] A

Available data for these disasters show that FEMA loss estimates are lower than SBA estimates for both real property and personal property. The average FEMA real property loss for Sally and Zeta was \$5,340 based on 18,683 applicants with FEMA verified losses. SBA average verified losses per household were valued at \$40,183 based on 5,401 applicants. SBA applicants with verified property losses represent a 7.5 times higher verified loss amount than FEMA. SBA median loss value of \$25,118 is 31.9 times higher than FEMA's value of \$785 for the same group of applicants.

Employing more accurately representative data sources than FEMA IA data is important to develop a more accurate estimation of unmet needs FEMA IA data often undervalue the extent of damage caused by a natural disaster for the following reasons:

- FEMA funding post-disaster is made available upon applicant eligibility including factors including but not limited to citizenship status, verifiable identity, home and/or flood insurance, and home ownership^[4].
- FEMA IA funds are not intended to return homes to their pre-disaster conditions but are limited to bringing damaged homes back to a habitable standard. For example, FEMA's IA program does not provide evaluations for non-essential living spaces such as extra bedrooms or living spaces inside homes.^[5] These standards limit the damage assessment data provided by FEMA and its use and value when analyzing a community's unmet needs.
- FEMA damage inspections do not account for repairs needed due to deferred maintenance or hardening/mitigation improvements.
- Hurricane's Sally and Zeta hit the State of Alabama in the Fall of 2020, during the COVID-19 pandemic. Due to the safety hazards associated with conducting on-site damage assessments, many assessments were conducted as "desktop" assessments, if at all.^[6] This likely caused significant under valuation of real and personal property damage assessments, leaving impacted populations with little to no relief.

Therefore, in order to determine the amount of unmet need more accurately, ADECA developed the following methodology that provides more accurate assessment by including resilience costs, factors in the increased costs of construction materials, leverages single family home values as a proxy for reconstruction costs, and accounts for households that may have remaining damage but did not apply for FEMA IA.

The following variables were used to calculate housing unmet needs and are described in more detail in sections 4.3.1 – 4.3.6, below:

1. FEMA Damage Category Application Counts of Minor-Low to Major-Low
2. FEMA Damage Category Application Counts of Major-High to Severe
3. FEMA "Other" Residence Type Application Counts of Major-High to Severe
4. FEMA IA Applications without Real Property FEMA Verified Loss
5. Estimate of Disaster Survivors that did not apply to FEMA
6. SBA Application Counts to Homeowner Associations and Landlords

For FEMA IA Applications with minor-low, minor-high, and major-low damage according to FEMA, the count of those applications in each county was multiplied by the overall average SBA verified property loss per damage category to determine the estimated total loss/support. The results of these calculations are provided in Table 4 below.

The County Count of FEMA IA Damage Category Applications

X (times)

Average SBA Verified Property Loss

= (equals)

Estimated Total Loss/Support for Damage Category

FEMA Damage Category Application Counts of Major-High to Severe

For FEMA IA Applications with major-high to severe damage, it was assumed that those structures were substantially damaged and require reconstruction. To determine the replacement cost of the home, ADECA used each county’s Zillow Single Family Home Value from August 2020. Since this Zillow home value also includes the cost of the land, ADECA assumed 66% of the value was attributable to the structure on the property, then took the average of all counties and multiplied this value by the total count of applications in the major-high to severe damage categories. The results of these calculations are provided in Table 4 below.

The County Count of FEMA IA Damage Category Applications

X (times)

Average Zillow Home Value (minus land)

= (equals)

Estimated Total Loss/Support for Damage Category

FEMA “Other” Residence Type Application Counts of Major-High to Severe

To account for impacts to FEMA IA Applications with major-high to severe damage categories and “Other” property types, ADECA used the average total for FEMA real property verified loss for those categories and multiplied them by the total county count of applications. The results of these calculations are provided in Table 4 below.

The County count of Other Residence Types FEMA IA Damage Category Applications

X (times)

Average FEMA Real Property Verified Loss

= (equals)

Estimated Total Loss/Support for Damage Category

FEMA IA Applications without Real Property FEMA Verified Loss

ADECA also accounted for the damage to applications without Real Property FEMA verified loss (RPFVL) because due to the COVID-19 pandemic and other reasons, an inspection never physically took place or no damages were found, likely because they were desktop inspections. To account for these types of impacts, ADECA accounted for count of applications by county with no RPFVL and multiplied it by average value for minor-low damage per the SBA. The results of these calculations are provided in Table 4 below.

Per County count of FEMA IA Applications without RPFVL

X (times)

Average SBA Value for Minor-Low Damage

= (equals)

Estimated Total Loss/Support for Damage Category

Estimate of Disaster Survivors that did not apply to FEMA

The total number of FEMA applications was subtracted from the total number of occupied housing units in each county. This remainder was multiplied by the percentage of SBA home loan applications that did not have a FEMA Registrant ID associated with them. The resulting count of estimated applicants who did not apply for FEMA assistance is multiplied by the SBA average value for minor-low damaged structures to produce an estimate of loss to the applicants. The results of these calculations are provided in Table 4 below.

Total Number of Occupied Housing Units per County

- (minus)

Total Count of FEMA Applications

X (times)

Percentage of SBA Home Loan Applications without FEMA Registration ID

= (equals)

County Count of Applicants that did not apply to FEMA

X (times)

Average SBA Value for Minor-Low Damage

= (equals)

Estimated Total Loss/Support for Damage Category

SBA Application Counts of Homeowner Associations and Landlords

Homeowner associations (HOA) and landlords are not eligible for FEMA housing assistance, but in some places (especially coastal areas) represent a significant portion of the housing stock. To assess impacts to these groups, ADECA summarized impacts through available SBA business data. Damages to HOAs, classified in SBA by the North American Industrial Classification System (NAICS) code 813990, and landlords, classified by NAICS code 531110 were calculated utilizing HUD's Federal Register damage classification system and summed for each county. The results of these calculations are provided in Table 4 below.

Total County Count of HOA and/or Landlords

X (times)

Average SBA Value for Classification Type

= (equals)

Estimated Total Loss/Support for Damage Category

The Unmet Needs Assessment methodology described above leverages SBA estimates of damage and repair needs, FEMA IA housing assistance data, and Zillow data of housing values to provide a more accurate representation of unmet need than only on FEMA verified losses alone. Specifically, utilizing SBA damage estimates provides a more comprehensive look at recovery than FEMA inspected damage, as SBA sends "construction specialists" trained to evaluate a more complete cost of repairing or replacing a damaged structure to each applicant, returning a more comprehensive estimate of recovery than original estimates from FEMA, and accounting for under-representation of impacted populations stemming from FEMA ineligible applicants or for disaster survivors that did not apply to FEMA provides a more accurate picture of overall housing impact across the impacted area.

Several additional considerations are factored to arrive at a more comprehensive picture for this estimated unmet need for impacted counties. Utilizing the average SBA real property damage amount for HUD damage thresholds (Minor-Low, Minor-High, and Major-Low) referenced below accounts for FEMA's recognized underestimation.^[7] Therefore, applying the average SBA property loss amount by county/HUD damage category to the total number of SBA applicants who were not approved, in conjunction with Zillow estimates of property values for those units experiencing major-high and severe damage, provides a more current estimate and realistic view of losses to residential property across the impacted areas.

Utilizing the unmet needs values from HUD discussed below, and FEMA data for the number of applicants results in an unadjusted housing impact of \$706.8 million. This value increases to more than \$812.8 million when adding fifteen percent (15%) resilience factor.

The State determined the level of damage for **Owner-Occupied** housing units according to **87 FR 31636** using the following thresholds^[7]:

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

The State determined the level of damage for **Renter-Occupied** housing units **87 FR 31636** using the following thresholds^[7]:

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

The table on the following page outlines the calculations made to determine overall housing unmet needs.

[1] State of Alabama, PY2020-PY2024 Five-Year Consolidated Plan. <https://adeca.alabama.gov/wp-content/uploads/2020-2024-Alabama-Five-Year-Consolidated-Plan.docx>

[2] Alabama | National Low Income Housing Coalition (nlihc.org)

[3] Federal Register Vol. 78, No. 43 /Tuesday, March 5, 2013. <https://www.govinfo.gov/content/pkg/FR-2013-03-05/pdf/2013-05170.pdf>

[4] <https://www.fema.gov/assistance/individual/program/eligibility>

[5] FEMA. (2019). Fact sheet: Reasons why you might have been found ineligible by FEMA. Retrieved from <https://www.fema.gov/fact-sheet/common-reasons-fema-may-find-you-ineligible-assistance-0>

[6] https://www.fema.gov/sites/default/files/2020-06/2020_Hurricane_Pandemic_Plan.pdf

[7] Federal Register, Vol. 87, No. 100. Tuesday, May 24, 2022.

[8] ADECA conducted outreach in attempts to obtain data from Public Housing Authorities, but at time of publication, data received was insufficient to include in this unmet needs analysis. Please see section 4.6 and 5.2.5 of this plan for more information regarding outreach efforts.

[9] Totals were derived from an analysis completed at the county-level and then aggregated for this summary.

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

FEMA IA applications were nearly split evenly between owners and renters with owners comprising fifty-five percent (55%) and renters comprising forty-five percent (45%) of all applications. Applicants from renter-occupied units were found to have slightly higher verified damage in their category than owner-occupied units, at eighty-three percent (83%) and seventy-seven percent (77%) respectively.

Thirty-six percent (36%) of applicants from owner-occupied units and forty-nine percent (49%) from renter-occupied units were found to have damage. Twenty-seven percent (27%) of applicants from owner-occupied units and forty percent (40%) of renter-occupied units received federal assistance. This results in a nine percent (9%) gap between units found to have damage and received assistance for both owner-occupied and renter-occupied units.

Over twenty-five percent (25%) of all units in Baldwin and Clarke counties are renter occupied, followed by twenty-two percent (22%) in Escambia and fifteen percent (15%) in Mobile.

A much larger share of applications came from house/duplexes at sixty-nine percent (69%), fourteen percent (14%) from mobile homes, and twelve percent (12%) from apartments.

Over twenty-five percent (25%) of all units in MID counties are mobile home units. Sixty-three percent (63%) of all damaged units in Clarke County were mobile home units, followed by thirty-eight percent (38%) in Escambia, twenty-four percent (24%) in Baldwin, and just six percent (6%) in Mobile.

Over half of the total FEMA verified loss was in Mobile County, followed by Baldwin County at twenty-nine percent (29%). Damage in Clarke and Escambia counties accounts for just six percent (6%) of the total.

The majority of applications from Mobile County were from renter-occupied units at fifty-nine percent (59%), while forty-one percent (41%) were from owner-occupied units. Two-thirds of damaged units in Mobile County were renter-occupied units. Fifty-five percent (55%) of renter applicants and forty-one percent (41%) of owner applicants in Mobile County were found to have damage. Just forty-five percent (45%) of renter applicants and thirty-one percent (31%) of owner applicants received assistance, leaving a ten percent (10%) gap between applicants found to have damage and received assistance for both renters and owners.

Only thirty-seven percent (37%) of all damage totals were from flooding, while sixty-three percent (63%) of damages were from other causes. Over twice as many renters were deemed to have flood damage than owners, sixty-eight percent (68%) and thirty-two percent (32%) respectively. Over two-thirds of applicants with flood damage did not have flood insurance, therefore did not receive insurance coverage for their damages.

FEMA IA Owner-Occupied

FEMA IA for owner-occupied units represents a total of \$114,808,557 FEMA verified loss. Forty-three percent (43%) of applicants received inspections, thirty-six percent (36%) of applicants were found to have damage and twenty-seven percent (27%) of applicants received assistance. Owners from Mobile County submitted the most applications at 22,921, of which thirty-one percent (31%) received assistance. Mobile County had the highest FEMA verified loss, totaling \$53,533,776. Baldwin County submitted the second most applications at 21,127, of which eighteen percent (18%) received assistance. Baldwin County had the second highest FEMA Verified Loss, totaling \$42,285,296.

FEMA IA Tenants Applications

FEMA IA Assistance for renter-occupied units represent a total of \$43,346,034 FEMA verified loss. Renters from Mobile County submitted the most applications, of which forty-five percent (45%) received assistance. Mobile County also had the highest FEMA verified loss, totaling \$37,954,533.

Sixty-four percent (64%) of applicants received inspections, forty-nine percent (49%) of applicants were found to have damage, and forty percent (40%) of applicants received assistance.

FEMA IA Applications by Housing Type

FEMA IA Applications received from owner-occupied units account for about fifty-five percent (55%) of all applications, while about forty-five percent (45%) were from renter-occupied units. Applications from house/duplex accounted for about sixty-nine percent (69%) of applications while nearly twelve percent (12%) were from apartments, and nearly fourteen percent (14%) were from mobile homes.

FEMA Real Property Damage Owner-Occupied Units

Thirty-six percent (36%) of owner-occupied units inspected for real property damage were found to have some level of damage according to the damage thresholds outlined in Federal Register Vol. 87, No. 100. Wilcox County had the highest percentage of applicants within the county found to have damage with fifty-three percent (53%), followed by Marengo County and Perry County each with forty-nine percent (49%) of applicants found to have damage.

FEMA Real Property Damage Rental Units

Forty-nine percent (49%) of applicants who received FEMA inspections from renter-occupied Units were found to have Real Property damage according to the damage thresholds outlined in Federal Register Vol. 87, No. 100. Mobile County had the highest percentage of applicants within the county found to have damage with fifty-five percent (55%), followed by Clarke County and Washington County, each with forty percent (40%) of applicants found to have real property damage.

Total Owner-Occupied and Renter-Occupied Units by County

Flood Damage and Insurance Summary

Over ninety-five percent (95%) of all FEMA IA applicants did not have flood insurance, and the majority of FEMA IA applicants with flood damage were renters. While renters do not typically hold flood insurance policies, their landlords may; however, damage to renters' personal property and loss of living space is not covered under a landlord's policy. Renters in Mobile County were hit the hardest, accounting for fifty-eight percent (58%) of all FEMA IA applicants with flood damage. Similarly, forty-two percent (42%) of all FEMA IA applicants without flood damage were renters from Mobile County. FEMA IA owner-occupied units in a flood zone that experienced flood damages were found to have nearly seven times the unmet need compared to those owners without flood damages, totaling \$18,212,777 and \$2,674,779, respectively.

Number of FEMA IA Applicants with Flood Damage

Sixty-eight percent (68%) of FEMA IA applicants with flood damage were renters and thirty-two percent (32%) were owners. Seventy percent (70%) of FEMA IA Applicants with flood damage were from Mobile County and twenty-five percent (25%) were from Baldwin County. Fifty-eight percent (58%) of all applicants with flood damage were renters from Mobile County.

Number of FEMA IA Applicants without Flood Damage

Forty-eight percent (48%) of FEMA IA applicants without flood damage were renters and fifty-two percent (52%) were from owners. Sixty-eight percent (68%) of FEMA IA applicants without flood damage were from Mobile County and eighteen percent (18%) were from Baldwin County. Forty-two percent (42%) of all applicants without flood damage were renters from Mobile County.

Number of FEMA IA Applicants with Flood Damage with or without Flood Insurance

Ninety-five and a half percent (95.5%) of all FEMA IA applicants did not have flood insurance and nine percent (9%) of all FEMA IA applicants without flood insurance had flood damage and sustained real or personal property losses. Over fourteen percent (14%) of FEMA IA applicants with flood insurance had flood damage and sustained real or personal property loss.

Owners in a flood zone with non-flood unmet needs

Owners in a flood zone with flood-related unmet needs

Major-High and Severe Damage to Houses by Type and County

Minor-Low, Minor-High and Major-Low Damage to Houses by Type and County

Pre-Disaster Owner and Rental Vacancy rates by County

(2) Public Housing and Affordable Housing.

The State acknowledges the impact disasters have on the rental housing stock and their subsequent impact on the availability of affordable housing.^[1] ADECA has reached out to several Public Housing Authorities (PHAs) with limited results – these and other outreach efforts are described in section 5.2. The needs of PHAs will also be considered when reviewing local recovery plans and proposed projects/activities.

ADECA also consulted with the **Alabama Housing Finance Authority (AHFA)** to assess storm impacts to its assisted housing portfolio, and the authority confirmed a total of nine (9) properties (547 units) located across Baldwin, Mobile and Clarke Counties were damaged by the storms totaling over \$4 million in damage. All of these damaged affordable housing properties were insured at the time of the storms, and it is expected these properties met their deductibles and were covered by insurance. However, the remaining unmet needs of these, and other affordable housing properties remains unclear.

While the State has received limited data on the impact Hurricanes Sally and Zeta have had on public and affordable housing, ADECA will continue outreach efforts and will update this section as more information is made available.

Pre/Post Storm Need for Affordable Housing

According to the National Low Income Housing Coalition (NLIHC) Gap Report, *“Across Alabama, there is a shortage of rental homes affordable and available to ELI households, whose incomes are at or below the poverty guideline or thirty percent (30%) of their area median income. Many of these households are severely cost burdened, spending more than half of their income on housing. Severely cost burdened households are more likely than other renters to sacrifice other necessities like healthy food and healthcare to pay the rent, and to experience unstable housing situations like evictions.”*

According to key figures from the Gap Report, 181,179 (or thirty one percent (31%) of renter households are ELI in Alabama, and of these ELI renter households eighty six percent (86%) are cost burdened and over two-thirds or sixty-seven percent (67%) are severely cost burdened. Further, across the State, there is a shortage of 76,023 affordable and available rental homes for ELI renters. There are only 58 affordable and available rental homes per 100 renter households in Alabama.

Pre-Disaster Owner-Occupied and Rental Vacancy Rates

According to HUD’s Market at a Glance, the most current vacancy data for the State of Alabama and the most impacted counties demonstrates a tight housing market with annual vacancy rate declining from 2010 to 2019 for both owner-occupied/for sale and rentals. Statewide the data demonstrates an average 2010-2019 rental vacancy rate of approximately 10.8% and a sales vacancy rate of approximately 2.1%. The pre-disaster rental vacancy rate data for the most impacted counties range from four percent (4%) (Clarke) to eight percent (8%) (Escambia) with Baldwin County being an outlier with a vacancy rate of forty-six percent (46%). The pre-disaster for sale vacancy rates ranges from two percent (2%) (Clarke) to three percent (3%) (Baldwin). The severe and major-high levels of damage of more than 4,731 housing units in the impacted counties will affect vacancy rates as disaster survivors compete for affordable and available housing.

While only six percent (6%) of Americans live in manufactured/mobile homes, over thirteen percent (13%) of Alabama households are manufactured/mobile homes. Nearly fourteen percent (14%) of all FEMA IA applications were from manufactured/mobile homes, and over fifteen percent (15%) of all FEMA IA applicants found to have some level of damage were from manufactured/mobile homes, and nearly thirty percent (30%) of all manufactured/mobile homes in disaster declared counties applied for FEMA IA assistance.

Given these findings, the State finds manufactured/mobile homes to play a large role in the affordable housing stock and has further researched its role in providing affordable housing opportunities for impacted populations.

Data collected in 2019 for the Manufactured Housing Survey by the U.S. Census Bureau shows the average sale price for a newly constructed manufactured home was \$86,474, while the average price of new single-family home was \$383,900.^[2] In that same year, nearly 95,000 new manufactured housing units were produced, accounting for over ten percent (10%) of all single-family units produced in 2019.

Amid the growing housing affordability crisis, which has only worsened due to the pandemic, Americans are looking to manufactured housing due to its affordability more than ever. According to the Urban Institute, construction of manufactured housing units costs less than half of the price to construct traditionally built single-family home units.^[3] Just this year, the Biden Administration announced its plan to support manufactured housing as an answer to the affordable housing crisis in the United States.^[4]

The State will utilize this information to target impacted populations from manufactured/mobile homes during the development of its programs.

Definition of Affordable Rents

ADECA has included the definition of affordable rents, income limits and minimum affordability periods within each of the applicable program descriptions in Section 8.

[1] ¹³ Bernstein, M. A., Kim, J., Sorensen, P., Hanson, M. A., Overton, A., and Hiromoto, S. (2006). *Rebuilding Housing Along the Mississippi Coast: Ideas for Ensuring an Adequate Supply of Affordable Housing*. RAND Corporation. Available online at: https://www.rand.org/pubs/occasional_papers/OP162.html; Reece, J. (2011). *Galveston After Ike: Moving Together Towards a Full Recovery*. The Kirwan Institute for Race and Ethnicity. Available online at: http://www.kirwaninstitute.osu.edu/reports/2012/01_2012_GalvestonOppMapping.pdf; Fussell and Harris, (2014).; Aurand and Emmanuel, 2019.; Ortiz, G., Schultheis, H., Novack, V., and Holt, A. (2019). *Extreme Weather as an Affordable Housing Crisis Multiplier*. Center for American Progress. Available online at: <https://www.americanprogress.org/issues/green/reports/2019/08/01/473067/a-perfect-storm-2/>; Rumbach, A., and Makarewicz, C. (2016). "Affordable housing and disaster recovery: a case study of the 2013 Colorado floods," in *Coming Home after Disaster: Multiple Dimensions of Housing Recovery*, ed A. Sapat and A.-M. Esnard (Boca Raton, FL: CRC Press), 99–112.; Hamideh et al., 2018; Weicher et al., 2017; Vinogradasky, 2009; Hamideh and Rongerude, 2019; Hirsch and Levert, 2009.

[2] U.S. Census Bureau

[3] <https://housingmatters.urban.org/articles/how-manufactured-housing-can-fill-affordable-housing-gaps>

[4] <https://www.bloomberg.com/news/features/2022-06-11/white-house-touts-factory-made-homes-as-affordable-housing>

Public Housing Authorities Damaged

| County/Municipality | Total # PHAs | Total PHAs Damaged | # of Units Damaged | Remaining Unmet Need |
|---------------------|--------------|--------------------|--------------------|----------------------|
| Baldwin | 2.00 | 0.00 | 0.00 | \$0.00 |
| Clarke | 0.00 | 0.00 | 0.00 | \$0.00 |
| Escambia | 2.00 | 1.00 | 68.00 | \$0.00 |
| Mobile | 4.00 | 0.00 | 0.00 | \$0.00 |
| Total | 8.00 | 1.00 | 68.00 | |

Data Source(s): ADECA has also reached out to Public Housing Authorities (PHA) across the MID Counties and the Alabama Housing Finance Authority (AHFA) to assess the impacts of the storms, these PHA's are listed below: • Chickasaw Housing Authority • Mobile County Housing Authority • Mobile Housing Authority • Prichard Housing Authority • Bay Minette Housing Authority • Foley Housing Authority • Housing Authority of the City of Brewton • Housing Authority of Atmore The Housing Authority of Atmore reported some properties suffered damage from the storms, but the housing authority met the insurance deductible, and they were fully covered by insurance. The Chickasaw Housing Authority confirmed there was no damage to their properties.

Fair Housing, Civil Rights Data and Advancing Equity.

Fair Housing

Alabama is dedicated to ensuring CDBG-DR funds reach individuals of Federally protected classes according to the Fair Housing Act and the Age Discrimination Act of 1975 including, but not limited to:

- Age
- Race
- Ethnicity
- National Origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial Status
- Disability

Through its efforts in advancing equity, ADECA has analyzed the readily available demographic data on the protected classes across the MID census tracts and will use it to inform the planning, design, and implementation of its disaster recovery programs in addition to diminishing the barriers that individuals face when accessing assistance. This data has been compiled and provided in table format included in the Appendices.

The State understands Federally protected classes experience higher disparities to accessing safe and affordable housing, better education, and employment opportunities. These disparities also impact Federally Protected Classes, vulnerable populations, and historically underserved groups from accessing disaster recovery funding and programs.

These disparities can be attributed to factors including but not limited to housing discrimination and/or displacement, overcrowding, and lack of public and private investments in housing, all of which contribute to increased housing cost burdens. Complicated application requirements such as proof of homeownership, duplication of benefit paperwork, proof of prior expenditures, verification of household income, and proof of flood insurance are additional

hurdles to overcome when applying for disaster recovery assistance. ADECA used has used this information to inform its CDBG-DR funding and programs, which include additional opportunities for individuals who face these barriers to access such as housing counseling, targeted outreach and marketing, and accessible language and translating services for people with Limited English Proficiency (LEP) and the deaf and hard of hearing. These additional services create equitable access for communities who have faced historical discrimination and disinvestment.

Analyzing demographic indicators on historically underserved and vulnerable populations has provided ADECA with the information needed to ensure its CDBG-DR funding and programs do not have an unjustified discriminatory effect or failure to benefit these populations. This information was used to develop the method of distribution for CDBG-DR funding allocations and program design.

As discussed further in Section 4.10, social vulnerability (SoVI) includes 29 criteria including race and poverty, dependence and age, wealth, barriers to access and ethnicity, gender and gendered employment, and household size and dependence to examine the capacity for the population to prepare, respond, and recover from disasters. As such, Social Vulnerability (SoVI) was used as part of the method of distribution to determine funding allocations for the HHMID and MID counties, in addition to total unmet need and total population.

Further, ADECA's CDBG-DR programs informed by this unmet needs assessment have been designed to directly impact populations who have experienced disproportionate and unfavorable outcomes due to historical discrimination and disinvestment in their communities. ADECA's 2020 analysis on fair housing choice in Alabama identified that Black and Hispanic households in the State experience disproportionate barriers to accessing safe, decent, sanitary, and affordable housing. Additionally, disability and failure to provide reasonable accommodations were the top complaints regarding fair housing issues between 2004 – 2014. These populations also experienced barriers to homeownership due to discriminatory lending practices, which contribute to these disproportionate housing needs.

ADECA has utilized this information in the development of its programs, which include the following requirements to address the needs of these populations who experience disproportionate needs:

- Home Recovery Alabama Program:
 - Prioritizes low- and moderate-income families and households with members of ages 17 and under, 65 and over, and persons with disabilities.
 - ADECA will perform targeted outreach to vulnerable populations and R/ECAP areas to ensure equitable access to program information and opportunities.
 - Rental program prioritizes HUD-identified MIDs and requires a 5-year affordability period.
- Local Recovery Planning Program:
 - Submitted projects are required to engage, evaluate, and consult with local vulnerable populations. A description on impact of proposed activities is also required within the plan.
 - Evaluation criteria includes: Serving an underserved community (defined as areas that were designated as a Promise Zone, Opportunity Zone, a Neighborhood Revitalization Strategy Area, a tribal area, or those areas that meet at least one of the distress criteria established for the designation of an investment area of Community Development Financial Institution at 12 CFR 1805.201(b)(3)(ii)(D)), vulnerable populations, Federally protected classes, hard-to-reach populations, Social Vulnerability Score (SoVI), proximity to underserved areas, and areas that were economically distressed prior to the disasters.
- Local Recovery Housing Competition:
 - Evaluation criteria may include: Serving an underserved community (defined as areas that were designated as a Promise Zone, Opportunity Zone, a Neighborhood Revitalization Strategy Area, a tribal area, or those areas that meet at least one of the distress criteria established for the designation of an investment area of Community Development Financial Institution at 12 CFR 1805.201(b)(3)(ii)(D)), vulnerable populations, Federally protected classes, hard-to-reach populations, Social Vulnerability Score (SoVI), proximity to underserved areas, and areas that were economically distressed prior to the disasters.
 - Affordable rents: new construction of housing of five or more units must be rented to low- and moderate-income households with incomes that do not exceed 80% area median income (AMI). See section 8.3.10 Affordability Period and Affordable Rents for more information on how ADECA defines affordable rents.

The program guidelines will provide further detail how programs will create equitable access to opportunity or mitigate the reinforcement of such exclusionary patterns.

In order to achieve HUD's goal of advancing equity with the use of its CDBG-DR funds, ADECA referred to HUD's Citizen Participation and Equitable Engagement (CPEE) toolkit for guidance and completed an assessment of whether ADECA's planned use of funds will likely have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs. The assessment includes a description of how the recovery needs of impacted individuals with disabilities will be addressed.

ADECA adhered to HUD's guidance on facilitating equitable engagement, by engaging with community partners, including them in the decision-making, and changing action plan program design based on their input.

As outlined in the Outreach and Engagement section of this Action Plan, ADECA reached out to numerous nonprofit and non-governmental advocacy organizations that provide services for those experiencing food insecurity, underserved youth, and homelessness to gather information on Sally and Zeta's impact to these populations and the types of services they need post-disaster. Unfortunately, ADECA did not receive extensive feedback. However, ADECA will continue to assess these needs and will update the unmet needs assessment and action plan and will offer public services as needs arise and/or are identified in Local Recovery Plans.

Public hearing information will be posted on the website. Accessible language and translating services will be available for these materials as well. The State recognizes certain populations experience additional barriers to accessing information on the assistance available and will provide accessible and remote information and application intake options.

ADECA held two public hearings on September 12, 2022 and September 13, 2022 in Baldwin and Mobile counties (both HUD-identified MID areas), respectively, as well as a listening session with community partners in Mobile (City) August 10, 2022 to inform program design in the action plan, as well as the types of recovery programs ADECA should seek to implement.

In developing the recovery and mitigation programs and selection criteria in this action plan, ADECA accounted for HUD's requirement to advance equity for protected class groups. A protected class group is a group of people with a common characteristic who are legally protected from discrimination based on that characteristic.

To complete its assessment, ADECA included available data and descriptions for the HUD-identified MID areas for which tables and maps are included in the appendices:

- Racial and ethnic makeup of the population, including relevant sub-populations, and the specific sub-geographies in the MID areas in which ADECA's programs will be carried out
- LEP populations
- Persons with disabilities
- Persons belonging to Federally protected classes under the Fair Housing Act (race, color, national origin, religion, sex—which includes sexual orientation and gender identity—familial status and disability) and other vulnerable populations (See appendix for tables and maps)
- Indigenous populations and tribal communities, including number and percentage of each identified group (See appendix for tables and maps)
- HUD Identified Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) Census Tracts

Historically distressed and underserved communities (See appendix for tables and maps)

Descriptions regarding the importance of collecting data for protected classes, vulnerable populations, and underserved communities are provided below. Maps depicting gender, religious affiliation, predominant living arrangements, Opportunity Zones, Indigenous Populations and Tribal Communities, and historically distressed and underserved populations are located in the appendix.

- **Predominant gender:** According to the National Women's Law Center, women face higher rates of poverty, especially elderly women, women with disabilities, women of color, and female-headed households. Having access to this information will help ADECA prevent discrimination of females in its programs.
- **Sexual orientation and gender identity:** According to HUD-funded studies, same-sex couples and transgender persons experience unfavorable treatment when attempting to access rental housing. Under the Fair Housing Act, interpretation of sex discrimination must include discrimination because of sexual orientation and gender identity.^[1] According to the Census Bureau, lesbian, gay, bisexual, or transgender (LGBT) adults experienced higher rates of economic hardship and mental health hardship during the COVID-19 pandemic. This information can be useful to ensure they do not receive additional barriers to accessing funding and programs due to their sexual orientation and/or gender identity.
- **Religious affiliation:** Housing discrimination because of religious affiliation may include but are not limited to refusing to rent or sell, steering renters or buyers to neighborhoods with certain religious institutions, preventing renters from displaying religious symbols and decorations, and making false statements about housing availability.^[2] This information can be useful to ensure they do not receive additional barriers to accessing funding and programs due to their religious affiliation.
- **Predominant living arrangements:** According to HUD, 75% of HUD rental assistance program funding serves female-headed households. Additionally, the National Women's Law Center found female renters are more likely than men to be low-income.^[3] About 60% of children living with unmarried, female-headed households are in poverty.^[4] This information can be useful to ensure female-headed households with children do not receive additional barriers to accessing funding and programs due to their familial status.
- **Opportunity zones:** Opportunity zones are economically distressed communities and are reported at the census tract level.^[5] Mapping of opportunity zones provides ADECA with insight into the areas which have experienced historical public and private disinvestment. The programs funded in this Action Plan, such as the Local Recovery Planning Program, direct allocations and competitive grant programs, may include opportunity zones as part of the program priorities and scoring criteria to encourage investment in these areas.
- **Indigenous populations and tribal communities:** Mapping out the location of indigenous populations and tribal communities gives ADECA the information needed to ensure prevention of discrimination within these communities.

Historically distressed and underserved communities: The Justice40 Initiative is a goal of the White House for 40% of Federal investment to be spent in communities who have experienced environmental injustice and decades of disinvestment.^[6] Mapping Justice40 communities allows ADECA to see which communities have lacked federal funding and target funding and program opportunities in these areas.

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

Maps that include Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) along with predominant race, Limited English Proficiency (LEP), and English language aptitude are provided below. R/ECAP areas are defined based on thresholds based on percentage rates of racial/ethnic concentrations and poverty, down to the census tract level. The racial/ethnic threshold is defined by having a non-white population of 50% or more, and the poverty threshold used by HUD is defined by having either a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower. The disaster-impacted counties with identified R/ECAP areas are Dallas, Marengo, Mobile, and Wilcox Counties.

Our analysis found there to be a significant impact to populations within R/ECAP areas. Owners in these areas had a total real property verified loss of nearly \$12 million. Renters had a total personal property verified loss of nearly \$9 million.

The disaster-impacted counties with identified R/ECAP areas are Dallas, Marengo, Mobile, and Wilcox Counties.

Information regarding the FEMA IA applications received from these areas is included below:

FEMA IA Applicants from R/ECAP Areas of **Mobile County**:

- There were 10,713 FEMA IA applications from R/ECAP areas within Mobile County making up over 19% of all applications received county-wide.
- 3,563 of all FEMA IA applications were for owner-occupied units. Of these, 1,962 were found to have Real Property FEMA Verified Loss, totaling \$9,886,138.63.
- 7,130 of all FEMA IA applications were for renter-occupied units. Of these, 4,236 were found to have Personal Property FEMA Verified Loss, totaling \$8,586,757.11.

FEMA IA Applicants from R/ECAP Areas of **Dallas County**:

- There were 772 FEMA IA applications from R/ECAP areas within Dallas County.
- 505 of all FEMA IA applications were for owner-occupied units. Of these, 234 were found to have Real Property FEMA Verified Loss, totaling \$953,707.88.
- 266 of all FEMA IA applications were for renter-occupied units. Of these, 92 were found to have Personal Property FEMA Verified Loss, totaling \$128,932.59.

FEMA IA Applicants from R/ECAP Areas of **Marengo County**:

- There were 52 FEMA IA applications from R/ECAP areas within Marengo County.
- 39 of all FEMA IA applications were for owner-occupied units. Of these, 19 were found to have Real Property FEMA Verified Loss, totaling \$74,784.03.
- 13 of all FEMA IA applications were for renter-occupied units. Of these, 7 were found to have Personal Property FEMA Verified Loss, totaling \$8,075.36.

FEMA IA Applicants from R/ECAP Areas of **Wilcox County**:

- There were 547 FEMA IA applications from R/ECAP areas within Wilcox County.
- 481 of all FEMA IA applications were for owner-occupied units. Of these, 253 were found to have Real Property FEMA Verified Loss, totaling \$911,415.23.
- 65 of all FEMA IA applications were for renter-occupied units. Of these, 25 were found to have Personal Property FEMA Verified Loss, totaling \$20,241.88.

Social Vulnerability

Understanding the additional hurdles certain populations face can help provide a more tailored approach to meet the specific needs of vulnerable populations impacted by disaster. ADECA has utilized an innovative and holistic approach to identify the specific needs of more vulnerable populations by analyzing various demographic indicators of vulnerability across counties impacted by Hurricanes Sally and Zeta. Understanding how human demographics, natural processes, and the built environment contribute to the inequitable distribution of disaster impacts and social burdens some communities face allows us to better facilitate equitable disaster recovery programs.

ADECA utilized data from the Social Vulnerability Index (SoVI), which evaluates the social vulnerability of all census tracts of the populations included in the Presidentially Declared Disaster Area of Interest (AOI). SoVI uses the most up to date census data (2016-2020) including 29 criteria including race and poverty, dependence and age, wealth, access barrier and ethnicity, gender and gendered employment, and household size and dependence to examine the capacity for the population to prepare, respond, and recover from disasters.

Results of ADECA's analysis of Hurricane Sally and Zeta's impact determined there are 205,241 people in 66 census tracts found to have high social vulnerability.

How Vulnerability Relates to Disaster Recovery

Understanding the vulnerability of disaster-impacted populations can help disaster recovery professionals provide specialized care in these areas when planning mitigation, response, and recovery efforts. Social vulnerability is the increased susceptibility of low-income and people of color to be impacted by detrimental climate disasters. In addition to income and race/ethnicity, households with children and/or disabled residents and household employment status are important vulnerability indicators associated with disaster recovery outcomes.[\[7\]](#)

When an intersection of these vulnerabilities occurs, impacted populations become even more likely to experience unfavorable recovery outcomes[\[8\]](#). Recognizing the importance of intersections between social vulnerability indicators can help disaster recovery programs to identify populations with multiple indicators for additional assistance in accessing resources for recovery. The use of SoVI maps like the one above allows for agencies involved in recovery efforts to better target these populations.

A causation of preexisting social inequities, vulnerable populations are more likely to experience slower and inadequate recovery outcomes.[\[9\]](#) Research shows that socially vulnerable populations experience barriers to access of recovery assistance after disaster strikes. Program eligibility requirements, complex application requirements, and lack of awareness of the existence of recovery programs, are examples of the challenges socially vulnerable populations face in the context of disaster emergencies.[\[10\]](#)

Natural and Environmental Hazards

The State has identified several natural and environmental hazards and their proximity to vulnerable populations and protected classes. ADECA will use this information to inform Program design, and mitigation and resilience components throughout all CDBG-DR programs. Through analyzing data from the National Housing Preservation Database (NHPD), ADECA has identified eight (8) public or affordable housing developments located within the floodplain, with an additional 45 developments located within 500 feet of a flood plain totaling 53 developments, housing over 3,000 household located in or near the flood plain. Furthermore, ADECA has identified 630 toxic or hazardous sites located within Racially and Ethnically – Concentrated Areas of Poverty (R/ECAP) Census Tracts using ESRI Living Atlas – Environmental Protection Agency (EPA) Toxic Sites data, the most prevalent hazards totaling 303 sites are Water Dischargers, and Hazardous Waste totaling 232 sites within these R/ECAP census tracts. Proximity to natural hazards identified in this analysis will be considered when reviewing submissions from subrecipients to administer programs and/or activities.

[1] https://www.hud.gov/sites/dfiles/PA/documents/HUD_Memo_EO13988.pdf

[2] https://www.hud.gov/program_offices/fair_housing_equal_opp/14religion#:~:text=In%20the%20process%20of%20buying,to%20discriminate%20based%20on%20rel

[3] <https://nwlc.org/resource/national-snapshot-poverty-among-women-families-2020/>

[4] <https://nwlc.org/resource/national-snapshot-poverty-among-women-families-2020/>

[5] <https://opportunityzones.hud.gov/>

[6] <https://www.whitehouse.gov/environmentaljustice/justice40/>

[7] Griego, A., Flores, A., Collins, T., and Grineski, S. (2020). Social Vulnerability, disaster assistance, and recovery: A population-based study of Hurricane Harvey in Greater Houston, Texas. <https://doi.org/10.1016/j.ijdr.2020.101766>

[8] Emrich, C., Tate, E., Larson, S., and Zhou, Y. (2019). Measuring social equity in flood recovery funding. <https://doi.org/10.1080/17477891.2019.1675578>

[9] Griego, A., Flores, A., Collins, T., and Grineski, S. (2020). Social Vulnerability, disaster assistance, and recovery: A population-based study of Hurricane Harvey in Greater Houston, Texas. <https://doi.org/10.1016/j.ijdr.2020.101766>

[10] (Wilson, B., Tate, E., Emrich, C., 2021; SAMHSA, 2017; Mickelson et al., 2019; American Flood Coalition, 2020.).

The table below includes demographic information statewide, in disaster-declared areas, and the MIDs. The two columns to the right represent combined totals for the HUD-identified and state-identified MID areas.

Grantee Demographics and Disaster Impacted Populations

| Demographic | Area-Wide Estimates | Area-Wide Percent | Disaster Declaration Estimate | Disaster Declaration Percent | MID Estimates | MID Percent |
|--|---------------------|-------------------|-------------------------------|------------------------------|---------------|-------------|
| Total Population | 5,039,877.00 | 100.00% | 802,389.00 | 15.90% | 711,826.00 | 14.10% |
| Under 5 years | 292,313.00 | 5.80% | 47,333.00 | 16.20% | 42,126.00 | 14.40% |
| 65 years and over | 887,018.00 | 17.60% | 151,336.00 | 17.10% | 133,089.00 | 15.00% |
| Population with a Disability | 477,579.00 | 9.50% | 66,397.00 | 13.90% | 56,455.00 | 11.80% |
| White or Caucasian | 3,472,475.00 | 68.90% | 520,027.00 | 15.00% | 485,493.00 | 14.00% |
| Black or African American | 1,350,687.00 | 26.80% | 246,654.00 | 18.30% | 193,671.00 | 14.30% |
| American Indian and Alaska Native | 35,279.00 | 0.70% | 8,547.00 | 24.20% | 7,126.00 | 20.20% |
| Asian | 80,638.00 | 1.60% | 12,035.00 | 14.90% | 11,531.00 | 14.30% |
| Native Hawaiian and Other Pacific Islander | 5,040.00 | 0.10% | 821.00 | 16.30% | 712.00 | 14.10% |
| Other | 95,758.00 | 1.90% | 14,305.00 | 14.90% | 13,293.00 | 13.90% |

Data Source(s): US Census Bureau - ACS

Income Demographics

| Income/Economic Demographics | Statewide | Areas Impacted by Disaster | HUD MIDs |
|------------------------------|-------------|----------------------------|-------------|
| Median Household Income | \$52,035.00 | \$39,100.00 | \$46,071.00 |
| Per Capita Income | \$28,934.00 | \$23,841.00 | \$25,923.00 |

Data Source(s): US Census Bureau - ACS

Income Demographics - Low Income

| Income/Economic Demographics | Statewide | Areas Impacted by Disaster | HUD MIDs |
|--|------------|----------------------------|------------|
| Income in the past 12 months below poverty level | 762,642.00 | 129,618.00 | 106,322.00 |

Data Source(s): US Census Bureau - ACS

LMI Analysis - Overall

| Category | Total LMI Persons | Total Population | Percent LMI |
|-----------|-------------------|------------------|-------------|
| Area wide | 1,953,270.00 | 4,713,130.00 | 41.44% |

Data Source(s): US Census Bureau - ACS

LMI Analysis - Federally Declared Disaster Areas

| County/Municipality | Non-MID-Total LMI Persons | Non-MID-Total Population | Non-MID-Percentage LMI | MID-Total LMI Persons | MID-Total Population | MID-Percentage LMI |
|---------------------|---------------------------|--------------------------|------------------------|-----------------------|----------------------|--------------------|
| Baldwin | 0.00 | 0.00 | 0.00% | 29,986.00 | 218,289.00 | 13.74% |
| Mobile | 0.00 | 0.00 | 0.00% | 98,742.00 | 413,977.00 | 23.85% |
| Clarke | 0.00 | 0.00 | 0.00% | 3,450.00 | 23,866.00 | 14.46% |
| Escambia | 0.00 | 0.00 | 0.00% | 4,446.00 | 36,775.00 | 12.09% |
| Dallas | 3,627.00 | 38,184.00 | 9.50% | 0.00 | 0.00 | 0.00% |
| Perry | 1,035.00 | 9,104.00 | 11.37% | 0.00 | 0.00 | 0.00% |
| Marengo | 1,174.00 | 19,138.00 | 6.13% | 0.00 | 0.00 | 0.00% |
| Washington | 1,757.00 | 16,336.00 | 10.76% | 0.00 | 0.00 | 0.00% |
| Wilcox | 2,244.00 | 10,552.00 | 21.27% | 0.00 | 0.00 | 0.00% |
| Total | 9,837.00 | 93,314.00 | 10.54% | 136,624.00 | 692,907.00 | 19.72% |

Data Source(s): ACS 2016-2020

Limited English Proficiency Breakdown of Disaster-Related Areas

| County/Municipality | Estimate Speak English Less than 'Very Well' | Percent Speak English Less than 'Very Well' |
|---------------------|--|---|
| Baldwin | 3,733.00 | 2.00% |
| Clarke | 66.00 | |
| Escambia | 283.00 | 1.00% |
| Mobile | 5,764.00 | 1.00% |
| Total | 9,846.00 | |

Data Source(s): US Census ACS 5-year estimates 2016-2020

Point-in-Time Count - Impacted by Disaster

| Geography | Emergency Shelter | Transitional Housing | Unsheltered Homeless | Total Known Homeless |
|---------------|-------------------|----------------------|----------------------|----------------------|
| Area wide | 1,421.00 | 631.00 | 1,299.00 | 3,351.00 |
| FEMA Declared | 493.00 | 286.00 | 439.00 | 1,029.00 |
| MID | 493.00 | 286.00 | 439.00 | 1,029.00 |

b. Infrastructure Unmet Need.

Disaster Damage and Impacts - Infrastructure.

For decades, infrastructure in Alabama has suffered from a lack of investment with a clear need for improvements across the infrastructure sector in many categories. In 2015, The American Society of Civil Engineers gave Alabama a C- grade on its infrastructure report card and the latest report card published on March 31, 2022, shows the same C- grade. On the infrastructure report card the “Dams” category cannot be graded since Alabama is still the only State in the United States without a dam safety program. Consequently, Alabama is disqualified from accessing federal infrastructure funds for dam-related inspections, training, and rehabilitation. Based on estimates from ADECA, United States Army Corp of Engineers (USACE) and other sources, the National Inventory of Dams shows that Alabama has 226 high hazard potential dams, which means that if they were to fail it would lead to loss of life or significant property damage[1]. Alabama has experienced 42 extreme weather events in the last 10 years which has cost the State up to \$20 billion in damages[2].

A major issue that Alabama faces is the condition of the roads and bridges. There are currently 620 bridges and over 2,960 miles of highway in poor condition and as a result, commute times have increased by 8.9% in Alabama since 2011. Additionally, public transit is in need of upgrades since twenty-five percent (25%) of transit vehicles in Alabama are past their useful life[3]. In 2019, Governor Kay Ivey enacted the first infrastructure investment effort in almost 30 years, the Rebuild Alabama Act. One of the programs included in this effort sets aside \$30 million annually for projects of local interest in the State highway system[4]. As of July 2022, President Biden’s Bipartisan Infrastructure Law has announced \$1.6 billion in funding to Alabama with over 80 specific projects identified already. Within this year \$1.3 billion will go towards repairs to roads, bridges, public transit, ports, and airports and over \$137 million for clean water[5].

Infrastructure systems affected by Hurricanes Sally and Zeta included damage to roads, bridges, water control facilities, including wastewater treatment and drinking water treatment, public buildings, public utilities, recreational facilities including beaches, parks, and other recreational areas. The immediate recovery efforts were well-documented by initial project worksheets submitted for Public Assistance and were analyzed in order to assess the specific infrastructure impacts from Hurricanes Sally and Zeta.

The FEMA Public Assistance (FEMA-PA) Program is designed to provide immediate assistance to impacted jurisdictions for emergency protective measures and permanent repairs to infrastructure and community facilities. The Federal share of assistance is generally not less than seventy-five percent (75%) of the eligible project cost, requiring the state to contribute the remaining twenty-five percent (25%) in cost share; however, for these disasters the Federal share was modified to ninety percent (90%) Federal share, and ten percent (10%) state contribution.

The Public Assistance Program for FEMA Disaster No. 4563 & 4573 identified a total of \$191,343,972 for Category A (Debris removal) and \$31,555,194 for Category B (Emergency protective measures) in public assistance.

Additionally, the State has identified \$95,033,145 in public assistance need for Categories C-G (permanent repair) to date. These categories include:

- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Buildings and Equipment
- Category F: Utilities
- Category G: Parks, Recreational Facilities, and Other Facilities

The table below includes the Estimated PA Cost, Local Match, Resiliency Measures (inclusive of increased cost of construction), and the total need (local match + resiliency). The infrastructure analysis assumes FEMA Public Assistance data is the baseline costs of the PA project, but to estimate infrastructure unmet need the baseline PA project costs needs to include the future costs of the project including resilience, and then increased costs of construction to more accurately estimate the Federal Share (90%) and the local share/unmet need (10%).

Based on this data, and local documentation for where the cost share will be covered before any application is approved, the State should have minimal unmet need for public assistance projects. If counties were to have zero (\$0) matching funds for these projects, the difference between total project amount (Estimated PA Cost + Resiliency) and the federal share obligated would represent a potential unmet need of \$13,508,011 (Local Match) for identified infrastructure damage eligible under FEMA-PA Categories C-G. Total Cost and Need by PA Category.

[1] Alabama Section of ASCE – Advancing the Science and Profession of Civil Engineering in Alabama (alabama-asce.org)

[2] Alabama-BIL-Fact-Sheet.pdf (whitehouse.gov)

[3] ALABAMA_The-Infrastructure-Investment-and-Jobs-Act-State-Fact-Sheet.pdf (whitehouse.gov)

[4] Infrastructure - Office of the Governor of Alabama

[5] Alabama-BIL-Fact-Sheet.pdf (whitehouse.gov)

c. Economic Revitalization Unmet Need.

Disaster Damage and Impacts - Economic Revitalization.

Hurricanes Sally and Zeta devastated the Alabama economy already reeling from the economic impacts from the COVID-19 pandemic that had shut down several economic sectors ranging from tourism, and hospitality sectors, commercial and office space, as well as the agriculture sector. Despite clear impacts from COVID-19, Alabama was found to be among the top states for economic development in 2020. Alabama was ranked ninth in job-creating economic development projects per capita by Site Selection Magazine in its yearly Governor's Cup analysis. [1] However, despite this economic growth, the benefits were not evenly distributed across the State. Most of this growth was concentrated in and around the Huntsville, AL metro area, over 300 miles away from the gulf coast.

According to local reporting, Sally and Zeta have further set back the tourism industry by closing beaches for approximately five weeks at the initial height of the pandemic, which led to cancellations of vacation rentals and decreases in occupancy that was already impacted by the pandemic. [2] In 2020 after shutdown orders were lifted and before Hurricanes Sally and Zeta hit Alabama, Mobile created Alabama's first Tourism Improvement District to market itself in an effort to attract more visitors to the area. The Mobile Tourism Improvement District (MTID) created a new stream of funding estimated at \$1.5 million per year over the next five years which would ideally result in increased tourism-driven revenue and assist Alabama in coming out of the pandemic stronger and faster than cities without the same resource. [3]

Alabama's agriculture industry is multifaceted and boasts more than 43,000 farms across 8.9 million acres. One (1) out of every 4.6 jobs is related to agriculture in the State and the industry contributes approximately \$70.4 billion to Alabama's annual economy^[4]. The agriculture industry was affected by both Hurricanes as they struck near harvest time, flooding, and damaging crops. This was especially devastating to farmers since they were already having a difficult year due to impacts from COVID. The Farm Service Agency (FSA) of the United State Department of Agriculture (USDA) acknowledged that Hurricane Sally's flooding and high winds impacted the agriculture regions in Alabama and neighboring states to the extent that it offered technical and financial assistance to eligible farmers and livestock producers.^[5]

According to an analysis of the Small Business Administration (SBA) Business loan data for applications with approved or denied loans that meet a HUD category of loss, the State realized a total verified loss for all businesses of approximately \$44,488,319, after accounting for an additional fifteen percent (15%) resilience costs, the State's total estimated economic impact is approximately \$51,161,567. According to the SBA business report, the SBA provided \$6,396,556 in total benefits to businesses. Of this total benefit amount, \$4,012,300 were paid out for repairs, replacement, or reconstruction to businesses. Therefore, the State's remaining economic unmet needs are valued at \$44,765,011.

Total Business Loans Approved by the SBA

SBA Applicant Breakdown

Estimating Business Operations Losses

^[1] [Alabama among top states for economic development in 2020 ranking - al.com](#)

^[2] <https://www.al.com/news/2020/09/crops-tourism-pummeled-hurricane-sally-rattles-coastal-alabamas-economy.html>

^[3] [Mobile leaders tout state's first tourism improvement district - al.com](#)

^[4] [Alabama Agriculture - Farm Flavor](#)

^[5] <https://www.fsa.usda.gov/state-offices/Alabama/news-releases/2020/usda-offers-disaster-assistance-to-farmers-and-livestock-producers-in-alabama-and-surrounding-states-impacted-by-hurricane-sally>

d. Mitigation Only Activities.

ADECA conducted a comprehensive mitigation needs assessment. The information provided herein is a summary of the findings of the mitigation needs assessment. A full copy of the full version can be made available upon request. The analysis in the mitigation needs assessment considers hazards with the potential to occur across those Alabama counties impacted by Hurricanes Sally and Zeta in 2020 with specific focus on those hazards most highly prioritized by impacted county hazard assessments and the State of Alabama mitigation plan risk assessment.^[1] Historically, this part of Alabama has been exposed to a variety of hazard events, including: riverine flooding, severe storms, straight-line winds, hurricane storm surges and wind, wildfires, hail, tornadoes, droughts, temperature extremes, lightning, fog, and coastal erosion/sea-level rise.

The risk assessment includes four (4) basic steps, including: hazard identification; profiling of hazard events; inventory of assets; and an estimate of potential human and economic losses based on exposure and vulnerability of people, buildings, and infrastructure.^[2] Additionally, the assessment connects empirically based hazard assessments with vulnerability, community lifelines information, and severity of consequences data, to provide a more holistic view of risks across the Alabama Sally/Zeta Area of Interest (AOI).

Based on the analysis and accounting for individual county and state hazard mitigation priorities utilized in this assessment, six (6) hazards posing the greatest threat to lives and property were targeted. Hurricane wind and storm surge, severe storms, sea-level rise/coastal hazards, tornadoes, and flooding are identified in the top six (6) hazards for each of Alabama's Sally/Zeta AOI county risk assessments^[3], with hurricanes topping each county's Severity Of Consequences (SOC) list. In Alabama, like elsewhere, hurricanes cause damage from wind and flooding. These six hazard threat types are recognized as high SOC based on their past frequency, historical impact to lives and property, climate sensitivity, frequency/severity portion, and current priority within county hazard risk assessments.

Following the identification of the top hazard threats, ADECA analyzed geographic locations most vulnerable to those hazards and corresponding mitigation projects for those areas. The list below provides a high-level summary of the hazards, geographic areas, and beneficial projects for mitigation.

Hurricane Force Winds

Mobile County, Baldwin County, and few places in Clarke and Escambia stand out with the highest amount of area in high hurricane wind risk zones. Most other counties in the AOI have medium or lower overall hurricane wind risk with Dallas, Marengo, and Perry each containing more than 90% of their land area in medium-low to low hurricane wind risk zones.

Mitigation projects to address hurricane force winds may include retrofitting homes and buildings to protect the most vulnerable components such as roofing, windows, and doors to make them more capable of sustaining high winds during events such as hurricanes.^[4]

Hurricane Storm Surges

Mobile and Baldwin have the most exposure to hurricane storm surge, followed by portions of Southern Clarke and Washington Counties. Only Mobile and Baldwin Counties have more than 10% of their land area in medium to high surge risk areas, indicating that areas with high storm surge threat do not often have high populations, great amounts of infrastructure, or higher social vulnerability relative to other places in the AOI.

Mitigation projects to address hurricane storm surge may include home elevations, securing manufactured housing units to a permanent foundation, and installation of storm shutters.^[5]

Sea-Level Rise (SLR) & Coastal Flooding

Only Baldwin and Mobile Counties have land area in the highest threat category for SLR hazard threat with 13% and 10% respectively. Beyond these two coastal counties, both Washington and Clarke Counties have areas in low, medium-low, and medium SLR hazard threat categories, making it a potential hazard of concern for these counties as well.

Mitigation projects to address sea level rise and coastal flooding may include home elevation and relocation projects.

Tornadoes

More than 75% of Washington's land area and 61% of Clarke's are categorized as high tornado threat compared to other AOI areas. Furthermore, Perry, Wilcox, and Marengo Counties are both largely characterized by medium-high tornado hazard threat with 67%, 52%, and 34% (respectively) of their land area seeing 1.5 – 2 warnings per year. Both Washington and Clarke have the greatest land area (20% and 17% respectively) in the medium overall tornado risk category. Although tornado risk is relatively low across the AOI, mitigating activities in these "greatest risk" areas will still have a positive societal impact.

Mitigation projects to address impacts from tornadoes may include retrofitting homes and businesses to include safe rooms, structural bracing, shutters, and hail-resistant roofing or flashing.^[6]

100-year Flooding

100-Year Flood hazard threat potential is present in every county but is significantly more pronounced along the tributaries to several major rivers across the AOI and the south shore of Baldwin and Mobile Counties. Baldwin, Dallas, and Wilcox each have the highest percentage of their land area in high flood hazard categories, followed by Clarke, Marengo, and Mobile.

Mitigation projects to address 100-year flood events may include stormwater management projects, relocation, or elevation of housing, relocation of mechanical and electrical equipment, and elevating other utilities and water heaters above base flood elevation (BFE).^[7]

Severe Storms

Mobile and Washington Counties, along with a large portion of Clarke County have been exposed to severe storms more frequently than other counties in the AOI with portions of these counties seeing more than 9 severe storm warning per year (on average). Additionally, Baldwin, Clarke, and Escambia all have significant portions of their counties in medium to medium-high severe storm threat areas. 84% of Escambia and nearly 80% of Baldwin County are located in a medium-high severe storm threat hazard area. More than 11% of Mobile County is located in a medium-high severe storm threat category, with Washington, Baldwin, and Clarke each containing areas categorized with higher risk than surrounding places.

Mitigation projects to address severe storms include retrofitting of public and private buildings to increase structural capacity to withstand heavy wind, rain, and snow events, and relocation projects.

[1] Priority of analysis determined by the Alabama counties impacted by Hurricanes Sally and Zeta - <https://ema.alabama.gov/county-mitigation-plan/> and the Alabama State Hazard Assessment - https://alabamaema.files.wordpress.com/2018/11/state-of-alabama_state-hazard-mitigation-plan-2018-update_final_07182018.pdf

[2] United States. FEMA. Hazard Mitigation Planning - <https://www.fema.gov/hazard-identification-and-risk-assessment> .

[3] Priority of analysis determined by the Alabama counties impacted by Hurricanes Sally and Zeta - <https://ema.alabama.gov/county-mitigation-plan/> and the Alabama State Hazard Assessment - https://alabamaema.files.wordpress.com/2018/11/state-of-alabama_state-hazard-mitigation-plan-2018-update_final_07182018.pdf

[4] https://www.fema.gov/sites/default/files/documents/fema_technical-job-aid-hurricane-wind-retrofit.pdf

[5] https://www.fema.gov/sites/default/files/documents/fema_protect-your-property-storm-surge.pdf

[6] https://www.fema.gov/sites/default/files/2020-06/fema-mitigation-ideas_02-13-2013.pdf

[7] https://www.fema.gov/sites/default/files/2020-06/fema-mitigation-ideas_02-13-2013.pdf

3. General Requirements

a. Citizen Participation.

To ensure that the disaster recovery action plan is comprehensive, addresses the State's largest unmet needs, and aligns with regional redevelopment plans, ADECA consulted with several stakeholders, citizens, local governments, and other entities to solicit feedback in the development of this plan. In accordance with the allocation notice, ADECA has scheduled two (2) public hearings – one (1) each in the HUD-identified MID areas of Baldwin and Mobile counties -- to solicit feedback on the proposed programs. A third public hearing is scheduled to be held in a location to be determined following publication of the action plan on the ADECA public website.

All comments ADECA receives at the public hearings will be considered when developing this action plan. Any changes ADECA makes to the action plan in response to public comments will be included in the final version of the action plan, in addition to a summary of the comments received and ADECA's response to each.

A summary of ADECA's outreach and engagement activities with state agencies, Indian tribes, local governments, and other entities during the development of this action plan is detailed in the section below.

ADECA's citizen participation plan is posted on the public website, which can be found at the following URL: <https://adeca.alabama.gov/>. An addendum to the citizen participation plan has been approved to specify the policies and procedures specific to the State's CDBG-DR allocation in accordance with the requirements specified in the allocation notices and the applicable provisions at 24 CFR 91.115.

Outreach and Engagement. In the development of this disaster recovery action plan, ADECA consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive. *Grantees should list key State, tribes, local governments, Federal partners, nongovernmental organizations, the private sector that were involved in the citizen participation process.*

ADECA recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through the following methods.

To ensure that the Action Plan aligns with regional redevelopment plans and the State's unmet needs, ADECA consulted with various stakeholders in the impacted areas, including local governments, state agencies, the MOWA Band of Choctaw Indians, non-governmental organizations, and public housing authorities, among other entities, to solicit feedback and inform the Action Plan.

Listening and Breakout Sessions

The largest outreach event the State hosted was a listening session on August 10, 2022, at the Mobile City and County Auditorium. ADECA hosted the listening session to consult with its community partners and to solicit input from stakeholders in the disaster-affected areas, regarding its disaster recovery grant, including the preliminary plans for use of the funds. The event provided a forum for the communities impacted by the disaster to provide input and direction related to the State's long-term recovery and was well-attended; it involved approximately 120 individual stakeholders.

Prior to the session, ADECA sent an email to various organizations inviting hundreds of stakeholders and interested parties to the session.

During the session on August 10th, ADECA delivered a presentation to provide attendees with an overview of the CDBG-DR grant. ADECA provided a high-level review of the notable federal requirements specified in the applicable Federal Register Notices and discussed the eligible uses of the CDBG-DR funds, among other topics. The presentation ended with ADECA fielding questions and comments from session participants.

Many of the comments received at the session underscored where some of the greatest unmet needs in the disaster-impacted areas remain, including in the housing supply and basic infrastructure. Participants highlighted the need for an increase in Baldwin County's affordable housing supply and a homeowner rehabilitation program. Spokespersons for the City of Daphne and the utility company mentioned that the city's water treatment and power systems need to be upgraded following the disaster and that financial assistance is needed for those activities.

Persons representing Saraland Water and Sewer and the predominantly LMI Town of Chickasaw also indicated that the public utility infrastructure in those municipalities needs to be upgraded after the disaster accentuated deficiencies in the current systems.

Following the session, ADECA conducted one-on-one sessions with county officials representing MID areas, as well as with individuals representing the State recognized MOWA Choctaw Indian tribe, whose population is based largely in the disaster-affected southwestern part of the State.

Individuals representing state agencies, Indian tribes, local governments, non-governmental organizations, the private sector, the Alabama Emergency Management Agency (AEMA) and other interested parties attended the session.

Damage Assessment Survey

The email from ADECA that invited community partners to the listening session also contained a damage assessment survey the State developed to help collect input and drive decision-making regarding how to use the disaster recovery funds; the survey proved to be both informative and helpful in developing this action plan.

ADECA received survey responses from area homeowners and renters, government employees, elected officials, and community stakeholders, with most of the responses coming from impacted persons/organizations in Baldwin County, followed by Mobile, Escambia, and Clarke counties. Additional survey respondents included persons representing Conecuh, Dallas, Marengo, Washington, and Wilcox counties—all counties that FEMA approved for public assistance for one of the two hurricanes.

The survey responses aided in the development of this action plan in multiple ways. Respondents expressed a strong preference for recovery dollars to be put toward infrastructure and economic development programs (above housing even), despite the unmet housing need in the State having been found to equal around ninety-two percent (92%) of the total unmet need.

The Grantee Proposed Uses of Funds section of this action plan gives weight to this preference by allocating a total of twenty percent (20%) of the State's recovery dollars to multi-sector infrastructure/economic development/mitigation programs—even though the unmet infrastructure and economic development need was found to be around eight percent (8%) of the State's unmet need.

Survey respondents also expressed a preference for single-family housing programs (both owner-occupied and rental) among the types of housing programs offered as choices. This preference is also reflected in the budget and recovery programs the State has proposed to implement. The State has decided to allocate \$280 million (around 56%) of its total allocation to a State-run single-family housing repair program. The \$280 million figure greatly exceeds the amount the State has allocated to any other program proposed for implementation.

The type of infrastructure and economic development programs respondents indicated they would like to see implemented varied, with many program types (e.g., stormwater, roads and bridges, small business loan, workforce development, etc.) in each sector garnering more than tepid support. ADECA has decided to implement two (2) multi-sector infrastructure/economic development/mitigation programs. The non-competitive program will be implemented by Baldwin and Mobile counties, as well as the city of Mobile. All three (3) entities will receive a direct allocation. The remaining multi-sector recovery dollars will be disbursed to subrecipients via a competitive program.

Following consultation with impacted residents and community partners, the subrecipients will be able to determine the multi-sector projects that will most effectively advance those counties' long-term recovery, while also achieving program objectives.

In addition to housing, infrastructure, and economic development, some survey respondents expressed an interest in the State's recovery dollars being put toward something other than those sectors. The State has subsequently proposed to allocate four percent (4%) of its recovery dollars to planning programs, with one program to be administered by the State and one to be administered by ADECA subrecipients.

Below is a summary of the outreach and engagement activities ADECA has conducted with various organizations and entities that have aided in the development of this action plan.

Additional outreach will be conducted, as needed, throughout the life of the grant. ADECA intends to use the guidelines in HUD's Citizen Participation and Equitable Engagement (CPEE) toolkit to implement and refine its outreach strategy during grant implementation.

A summary of the results of the 20-question online survey, including the results, is included in the Appendices.

Federal Partners

ADECA has worked closely with the HUD field office in Birmingham and the regional office in Atlanta to develop its disaster recovery programs and will continue to consult with HUD officials to ensure that the CDBG-DR funds are used in compliance with program requirements and to ensure timely disbursement of the funds.

ADECA also coordinated with FEMA and SBA to obtain data to inform the unmet needs assessment and other critical aspects of this plan such as the Method of Distribution.

Local governments

ADECA has collaborated extensively with officials in Baldwin and Mobile counties (both HUD-identified MID areas) and has also conducted separate outreach activities with local governments, as indicated below.

- A meeting was held with Baldwin County officials March 22, 2022, in Montgomery to discuss the method of distribution related to Alabama's CDBG-DR grant.
- A meeting was held with Mobile County officials on July 27, 2022. The method of distribution for the CDBG-DR funds was also discussed at this meeting.
- A listening session was held at the Government Plaza Building in Mobile August 10, 2022, that included many officials representing local governments, including all four HUD-identified MID areas – Baldwin, Clarke, Escambia, and Mobile counties. Officials representing several municipalities in Alabama also attended the session, including those from the cities of Atmore, Bayou La Batre, Brewton, Chickasaw, Citronelle, Daphne, Fairhope, Foley, Mobile, Prichard, Robertsdale, Saraland, and Thomasville. Other government officials who attended the session include State Representative Adline Clark (Mobile), a representative of Perry County, and the Baldwin County Coroner.
- One-on-one meetings that provided more focused time to the local government officials were held August 10, 2022, following the Listening Session. Those meetings were held with officials representing Baldwin and Mobile counties, and the cities of Foley (Baldwin County) and Prichard (Mobile County). Topics ADECA discussed with the officials include the method of distribution for the CDBG-DR funds, the HUD-preferred emphasis on housing recovery programs, housing recovery progress since the disasters, and the possibility of ADECA's directly implementing planning programs/activities. Recovery needs identified during the session include community centers and shelters in Mobile County, infrastructure improvements, and agricultural programs to benefit farmers in the area.
- Officials representing the following local governments responded to the State's damage assessment survey that was emailed July 27, 2022: Atmore, the Baldwin County Commission, Chickasaw, Creola, Elberta, Fairhope, Faunsdale, Flomaton, Foley, Magnolia Springs, Perdido Beach, Prichard, and Summerdale.
- ADECA distributed the Damage Assessment Survey to all jurisdictions located in the MID areas.

Consultation with local governments will continue throughout implementation of the grant, including and especially with Baldwin County and Mobile (City and County), since those jurisdictions will be responsible for using and managing a large portion of the State's allocation. Local Recovery Plans will require subrecipients to demonstrate adequate outreach to and coordination with local governments occurred as a condition for approval.

State and Local Agencies

Officials representing the Alabama Tombigee Regional Commission (ATRC), which represents 10 counties—Choctaw, Clarke, Conecuh, Dallas, Marengo, Monroe, Perry, Sumter, Washington, and Wilcox counties—in west-central and southwestern Alabama, attended the August 10, 2022, listening session that was held at the Government Plaza Building in Mobile. The Alabama Emergency Management Agency (AEMA), which is the state agency that has primary responsibility for the administration of FEMA funds, as well as the Baldwin County Emergency Management Agency, also attended the session.

ADECA has collaborated extensively—separate from the listening session—with the AEMA and regional planning commissions in the State.

As detailed more extensively in the Unmet Needs Assessment in this action plan, ADECA has conducted outreach with public housing authorities, including the Housing Authority of Atmore (Escambia County) and the Chickasaw Housing Authority. ADECA has also made other attempts at outreach to several public housing authorities in three HUD-identified MID areas – Baldwin, Mobile, and Escambia counties. An official representing the Prichard Housing Authority (Mobile County) attended the listening session.

Officials representing the following state and local agencies responded to the State's damage assessment survey: the ATRC, the Baldwin County Emergency Management Agency, the Bay Minette Housing Authority (Baldwin County), and the Top of Alabama Regional Council of Governments (TARCOG).

Tribal Government

ADECA's engagement with state-recognized Indian tribes mostly consisted of a one-on-one meeting that was held with representatives of the MOWA Choctaw Indians (southwest Alabama) at the Government Plaza Building in Mobile Aug. 10, 2022, following the listening session.

The MOWA representatives indicated that the CDBG-DR funds have the potential to meet unmet infrastructure needs in the area, since in some cases, FEMA did not approve any financial assistance for the damages the tribe-owned facilities incurred.

The MOWA Choctaw Indians also attended the ADECA listening session that was held at the Government Plaza Building in Mobile Aug. 10, 2022, prior to the one-on-one meeting with the tribe officials, and had questions related to eligible activities and cost reimbursement. The MOWA tribe contains a significant elderly and disabled population that is living in LMI housing or mobile home units, according to the tribe representatives.

Additional meetings will be scheduled with any federally- or state-recognized Indian tribe, upon request.

Non-governmental organizations and the private sector

Both private sector stakeholders and non-governmental organizations in Alabama attended the listening session ADECA held at the Government Plaza Building in Mobile Aug. 10, 2022. Some of the Alabama businesses that attended include:

- Adams & Reese (law firm)
- HGI (professional services)
- Kimley-Horn (professional services)
- Volkert, Inc. (professional services)
- Southern Engineering Solutions (professional services)

To comply with HUD's requirement to consult with organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities, ADECA invited several organizations to attend the listening session, which drew persons representing the following organizations:

- Azalea City CDC (food distribution center)
- Universal Childhood Enlightenment Council (non-profit organization)
- Concrete Rose Foundation (non-profit organization that serves underserved youth)
- Family Promise of Baldwin County (homelessness organization)
- Juneteenth Mobile (non-profit organization)
- United Way (Baldwin County)

ADECA has conducted separate outreach with the Alabama Rural Coalition for the Homeless and Alabama Arise, the latter of which is a non-profit organization that attempts to advance public policies to improve the lives of Alabama residents who are marginalized by poverty. Additionally, ADECA has successfully engaged with Alabama Appleseed for Law and Justice, which is a non-profit organization that is a member of a national organization that works with communities to end poverty and achieve racial justice at the federal, state, and local levels.

Officials representing the following organizations participated in the State's damage assessment survey: the American Red Cross, Dumas Wesley Community Center (Mobile), Family Promise of Baldwin County, Homeless in Mobile, Penelope House (Mobile), Southern Engineering Solutions, and United Way (Baldwin County).

Further, subrecipients must demonstrate adequate outreach has been done to non-governmental organizations and the private sector has been done as a condition for approval.

Other stakeholders and affected parties

Various other organizations in Alabama attended the listening session ADECA held in Mobile Aug. 10, 2022, including media and utility companies, housing organizations, and faith-based organizations. Individuals representing the following media companies attended the session:

- Call News
- Alabama Media Group

Individuals representing the following utility companies attended the session:

- Alabama Power Company
- Saraland Water and Sewer Board
- Daphne Utilities

Individuals representing the following housing organizations attended the session:

- Manna Homes (Mobile)
- Prichard Housing Authority (Mobile County)
- Center for Fair Housing (Mobile, non-profit organization)
- Africatown Redevelopment Corporation (Mobile)

Individuals representing the following faith-based groups attended the session:

- Present Truth Outreach Ministry
- Entrepreneurs for Christ
- Hope Community Group

Officials representing the following organizations participated in the State's damage assessment survey: the Magnolia Springs Public Library, the Magnolia Springs Volunteer Fire Department, and the Saraland Water and Sewer Board.

All affected Alabama residents and interested parties will have the opportunity to comment on the proposed action plan following its publication on the State's website—prior to submittal of the action plan to HUD. Future opportunities for action plan input will be provided via 30-day public comment periods for all substantial amendments that will be submitted to HUD for approval.

In addition to the activities above, ADECA has published this action plan on <https://adeca.alabama.gov/> for a 30-day public comment period. Citizens were notified through ADECA website, Newspaper, and listserv email. ADECA will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP).

A summary of citizen comments on this action plan, along with ADECA responses, is in Appendix c of this document.

For more information, citizens can refer to ADECA citizen participation plan that can be found at <https://adeca.alabama.gov/compliance-plans/>

Public hearings.

As required per the federal allocation notices, ADECA, as a HUD recipient whose CDBG-DR allocation is greater than \$500 million, conducted multiple public hearings in HUD-identified MID areas to solicit public comments related to this action plan. To maximize citizen participation efforts, ADECA held two public hearings prior to publication of the action plan on the ADECA website. A third hearing will be held after the plan is published on the public website Sept. 20, 2022. The hearings will have provided reasonable opportunity, geographic balance, and maximum accessibility for citizen comment and ongoing citizen access to the use of grant funds. The first two public hearings were held in the two counties—Baldwin and Mobile—where the State's most substantial unmet needs remain. The hearings were held on dates and in the locations listed in the table below:

During the September hearings, the State presented a detailed breakdown of the allocation and the State's proposed use of the funds, including the specific recovery programs the State is proposing to implement and the type of program (i.e., direct-run, subrecipient-administered, competitive process, direct allocation) that will be implemented to disburse funds to individual applicants and eligible entities.

The September hearings were advertised on the ADECA website Aug. 16, 2022 (27 days prior to the first hearing) and published in the print and online versions of the *Mobile Press-Register* Aug. 21, 2022, in accordance with ADECA's Citizen Participation Plan. The hearings were held in facilities physically accessible to persons with disabilities, with accommodation to ensure full participation opportunities, and were also accessible for individuals with Limited English Proficiency.

A 30-day public comment period that commenced Sept. 20, 2022, and ended Oct. 20, 2022, was provided following publication of the Action Plan on the public website.

When developing the action plan, ADECA considered all public comments it received at the hearings. All comments and questions ADECA received during the 30-day public comment period, as well as ADECA's response to each, will be included as an appendix to the final Action Plan submitted to HUD.

Complaints. Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). ADECA will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on <https://adeca.alabama.gov/> to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

As required per the allocation notices, ADECA will provide a timely written response to every citizen complaint it receives. The response will be provided within fifteen (15) working days of receipt of the complaint. If a response cannot be provided within fifteen (15) working days, ADECA will document why additional time for the response is required.

A complaint or a grievance is defined as a wrong that is perceived by a citizen to have occurred or been committed during the implementation of any of the disaster recovery programs, wherein the citizen pursues resolution of that perceived wrong by bringing an action to be addressed by the affected entities or interested parties.

Complaints and grievances are to be stated in writing by the aggrieved party or his representative, and are to be submitted to the applicable local, state, or federal government agency, for resolution.

When a unit of local government receives written complaints concerning its disaster recovery programs or its citizen participation plan, that unit of local government is to follow its complaint resolution process to address those written comments and complaints within a reasonable time, or otherwise when practicable.

At any time, a citizen may directly contact ADECA or HUD to submit comments and complaints concerning a local government's work pertaining to its CDBG-DR grant application, grant administration, and grant program implementation processes. However, citizens are encouraged to first resolve their comments and complaints at the local government level prior to initiating an attempt to involve ADECA or HUD in their comment or complaint resolution process.

All such comments, complaints, and grievances submitted to ADECA or to HUD shall be addressed in writing to the following designees:

ADECA:

Alabama Department of Economic and Community Affairs (ADECA)

Community and Economic Development Division

401 Adams Avenue, Room 500; Post Office Box 5690

Montgomery, Alabama 36103-5690

HUD:

United States Department of Housing and Urban Development

Office of Community Planning and Development

Medical Forum Building, Suite 900

950 22nd Street North

Birmingham, AL 35203

Records of the citizens' comments and complaints that have been received by a local government concerning its CDBG-DR Program, and records of the subsequent actions that have been taken by the local government in response to those comments and complaints, shall be maintained on file at the local government's headquarters office, and shall be made available for public review and inspection upon request.

All verbal complaints the State receives will be considered informal and not subject to the same resolution process described above. ADECA will attempt to resolve any such complaint(s) it receives.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review and can be submitted multiple ways—via email, phone, online, or mail. To speak with a Fair Housing Equal Opportunity (FHEO) intake specialist, complainants should call 1-800-669-9777. To speak with their local FHEO office (Region IV includes Alabama), complainants should call 1-800-440-8091.

Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735, or email: hotline@hudoig.gov).

Accessibility

The action plan, substantial action plan amendments, and performance evaluation reports shall be made available to citizens, citizen groups, public agencies, and other interested parties upon request and will also be available on the public website. Information regarding how to obtain the materials will be made available through public hearings that are held throughout implementation of the CDBG-DR grant.

The materials will also be made available in various formats and in Spanish, upon request, and shall be accessible to persons with disabilities and to persons of Limited English Proficiency. Persons with disabilities or special needs who may require special materials, services, or assistance with accessing program materials should call Mr. Trent Williams at (334) 353-3409, or, email him at trent.williams@adeca.alabama.gov.

Conclusions from a four-factor analysis that is included in the state's Language Access Plan for Limited English Proficiency persons (for all HUD-assisted programs) will guide the state in determining which language assistance measures will be undertaken to guarantee access to the CDBG-DR program by LEP persons.

To determine the state's LEP population, ADECA used census data, which showed that the state meets the 1,000 LEP persons threshold for Spanish (or Spanish Creole) speaking LEP persons, other Indo-European language speaking LEP persons, and Asian and Pacific Island language speaking LEP persons. However, since the latter two groups are comprised of several hundred related languages and dialects, neither meets the 1,000-person threshold. Additionally, of the nine HUD- and state-identified MID areas, only Mobile County meets the threshold of 1,000 LEP persons (Spanish or Spanish Creole-speaking) within the respective jurisdiction.

Any entity that is awarded program funding will be required to conduct a four-factor analysis to determine which language assistance measures need to be undertaken to provide access to the CDBG-DR program by LEP persons. If the analysis determines that a population exceeding 1,000 LEP persons exists within the service area, the entity must develop a Language Access Plan and provide a description of its proposed outreach efforts during the Letter of Conditional Commitment stage. Because the state's most recent analysis has already identified Mobile County as an area with more than 1,000 LEP persons, Mobile County will be required to prepare a Language Access Plan regardless of the results of its four-factor analysis.

The state commits to monitoring its subrecipients' implementation of their language access plans, including the identification and provision of the materials that will be made available to LEP persons, the means by which the materials will be made available, and the identification and provision of any translation services that may be necessary. The state will require all language access plans to include certifications that language access plans have been developed, adopted, and will be implemented for all CDBG-DR projects. The subrecipients' language access plans must also identify all LEP populations exceeding 1,000, or five percent of the total jurisdiction population, whichever is less.

If a subrecipient's Language Access Plan reveals that an LEP population of 1,000 or more persons (or five percent of total population but at least 50 persons) exists within the jurisdiction, the subrecipient must provide appropriate language assistance through the posting of public hearing notices in areas frequented by LEP persons of the threshold population(s) in the language(s) spoken. If translation services at the public hearings are requested by LEP persons, the subrecipients must also accommodate those needs.

Persons requesting oral or written translation services for any public hearing should contact Mr. Trent Williams at (334) 353-3409 or email him at trent.williams@adeca.alabama.gov; the state will ensure that ADECA or the subrecipient can accommodate the request for translation services prior to the public hearing being held.

As noted in the Construction Standards section of the action plan, Section 504 of the Rehabilitation Act and the Americans with Disabilities Act require all construction activities assisted with federal funds to comply with applicable federal accessibility mandates to ensure that accommodations for persons with disabilities are implemented. For the state, this will include compliance with the federal laws and effectively communicating with disabled individuals by providing auxiliary aids and services, as needed.

The descriptions of the proposed recovery programs in the action plan clarify that the state will consider exceptions to each of the award caps, as needed, to accommodate individuals with disabilities. Additionally, the state will require all entities applying for funding to the proposed Local Recovery Planning program (eligible entities include the nine HUD- and state-identified MID areas) to submit recovery plans that adequately plan to serve vulnerable populations, which include individuals with disabilities, prior to receiving funding.

Citizens, citizen groups, public agencies, and other interested parties will be allowed access to program-related information, documents, and records—covering at a minimum the preceding five-year period. The materials will be accessible during regularly scheduled business hours of the local government, agency, or other entity responsible for administering the applicable program, or at the time, location, and in the format decided by the responsible entity—and according to the applicable situation or circumstance.

- Since HUD has waived the provision of the federal regulation related to citizen participation that requires a 15-day public comment period be provided for the quarterly performance evaluation reports, ADECA will forego providing a public comment period for performance reports related to the hurricanes Sally and Zeta CDBG-DR grant. This is the same policy ADECA has implemented for the CDBG-DR grant it received from HUD for the 2011 tornadoes that precipitated a federally declared disaster and congressional appropriation to the State.

b. Public Website.

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

The items are made available through <https://adeca.alabama.gov/>. Specifically, ADECA will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and

status of services or goods currently being procured by the grantee or subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, ADECA will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly. ADECA will make all documents available in a form accessible to persons with disabilities and Limited English Proficiency, as needed. In addition, ADECA will maintain its comprehensive website regarding all disaster recovery activities assisted with these funds.

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

ADECA will amend its action plan to update its needs assessment, modify or create new activities, or re-program funds, as necessary. All action plan amendments will include a chart or table that illustrates how all funds are budgeted (e.g., by program, subrecipient, grantee-administered activity, or another category) and will be published on the ADECA website. Each amendment will describe the changes within the context of the entire Action Plan.

The current version of the action plan will be viewable as a single document. At a minimum, each amendment will: (1) identify exactly what content is being added, deleted, or changed, (2) clearly illustrate where funds are coming from and where they are moving to, and (3) include a revised budget allocation table that reflects the entirety of all funds, as amended.

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

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity, or
- Proposes a reduction in the overall benefit requirement, or
- The allocation or reallocation of greater than 10% of the budget allocation

When ADECA pursues the substantial amendment process, the amendment will be posted here at <https://adeca.alabama.gov/> for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. ADECA will review and respond to all public comments received and submit to HUD for approval.

ADECA will provide a 30-day comment period prior to submission of all substantial action plan amendments to HUD. All substantial amendments will be published on ADECA's disaster recovery website and will afford citizens, affected local governments, and interested parties an opportunity to review and comment on the proposed amendment.

Any updates or changes to the action plan in response to public comments will be clearly identified in the action plan. A summary of the public comments received regarding the amendment, and ADECA's response to each, will be included in the amendment's finalization process.

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

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

An amendment to the Action Plan that does not meet any of the criteria noted in the above Substantial Amendment section will be considered a non-substantial amendment. Non-substantial amendments may be made at the discretion of ADECA and will not require a public comment period. Notice of a non-substantial amendment will be provided through ADECA's usual program communication processes to chief elected officials, public agencies, citizen groups, and interested parties.

ADECA may also publish additional public notices and conduct additional hearings (or provide public comment periods) to meet program requirements, if unique circumstances arise (e.g., a natural disaster, pandemic, emergency allocation of funds, or another situation that is not already accounted for).

ADECA will notify HUD when it makes any amendment to the action plan that is not substantial and will publish the amendment on the public website.

d. Displacement of Persons and Other Entities.

Alabama's Plan for Minimizing Displacement (<https://adeca.alabama.gov/wp-content/uploads/State-of-Alabama-Plan-for-Minimizing-Displacement.doc>) declares that the State will discourage entities from designing programs that involve extensive displacement, and that entities should displace persons and businesses only when there is no reasonable alternative to accomplishing the purposes of their program.

To minimize the displacement of individuals, families, businesses, farms, and nonprofit organizations that may be affected by the activities outlined in this action plan, ADECA will coordinate with all agencies and entities necessary to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and the implementing regulations at 24 CFR Part 570.496(a) to minimize displacement.

Displacement policies and procedures apply to both property owners and renters. Should any proposed projects or activities cause the displacement of people, the appropriate policies will be adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met. ADECA will include detailed policies and procedures for when proposed programs or projects could potentially cause the displacement of people or other entities. ADECA also will budget to cover the costs involved in implementing those policies and procedures and the reasonable costs necessary to carry out the purposes of the grantee's program.

The State's Uniform Relocation Assistance Guide and Residential Anti Displacement and Relocation Assistance Plan (RARAP) is located on the ADECA's webpage at <https://adeca.alabama.gov/cdbg-disaster-recovery/>. This plan, which will be amended as needed to reflect Hurricane Sally and Zeta activities, will ensure subrecipients minimize displacement.

The State of Alabama's Plan for Minimizing Displacement also requires that that all localities applying HUD funds through the State certify that, "*The City/County will minimize displacement of persons as a result of activities with CDBG funds and will assist persons actually displaced as a result of such activities.*" Further, upon funding, all recipients shall be required to keep a local Plan for Minimizing Displacement in the program files. ADECA can provide assistance to localities if they need to create this plan.

CDBG-DR funds may not be used to support any federal, state, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. None of the currently planned projects under this Action Plan contemplate use of eminent domain.

e. Protection of People and Property.

This action plan details how this funding will be allocated to reduce the effects of natural disasters and eliminate long-term risks to southern Alabama. The goal of the CDBG-DR funded activities outlined in this plan is to reduce risks and vulnerabilities of people in hazard-prone areas through current technology; reduce the potential impact of natural disasters on new and existing properties, infrastructure, and local economies; and promote education, outreach and research and development programs to improve the knowledge and awareness among citizens and local industries, about potential hazards and mitigation alternatives that can reduce vulnerabilities.

Through its programs, ADECA intends to promote high quality, durable, energy efficient, sustainable, and mold resistant construction methods in areas impacted by the disaster. All newly constructed buildings will meet all locally adopted building codes, standards, and ordinances. In the absence of locally adopted and enforced building codes, the requirements of the Alabama State Building Code will apply. Future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations. The incorporation of these measures will help to ensure that communities build back safer and stronger than before Hurricanes Sally and Zeta and reduce costs in recovering from future disasters.

Elevation standards.

New construction, repair of substantially damaged structures, or substantial improvement to structures principally for residential use and located in the one percent (1%) annual (or 100-year) floodplain, requires the structure to be elevated with the lowest floor, including the basement, at least two (2) feet above the one percent (1%) annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents below two (2) feet above base flood elevation must be elevated, or flood proofed up to at least two (2) feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three (3) feet above the 100-year floodplain. Subrecipients may elevate up to three feet above the base flood elevation for the subject property so that it qualifies for NFIP flood insurance premium discounts when it is cost reasonable for the subrecipient to do so and when it does not create other conflicts.

The State will—at a minimum—adhere to the advanced elevation requirements established in section II.B.2.c. of the Federal Register Notice, subtitled "*Elevation standards for new construction, reconstruction and rehabilitation of substantial damage, or rehabilitation resulting in substantial improvements.*" To this effect, future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

Nationally, the average cost to elevate a home is between \$30,000 and \$100,000. The average cost to elevate a home is dependent upon several factors including, but not limited to the size of the home, the number of feet it must be elevated, type of foundation, and the location of the home. Based on preliminary research, the average cost to elevate a home in Alabama aligns with the national average, between \$30,000 and \$100,000. However, the cost to elevate can be more or less depending on the value of the home and the factors mentioned above.

Nonresidential structures, including infrastructure, assisted with CDBG-DR funds will adhere to the requirements established in section II.C.2. of the Federal Register Notice, subtitled “*Elevation of nonresidential structure.*” Nonresidential structures will be elevated or floodproofed up to at least two feet above the 100-year (or one percent annual chance) floodplain. All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain will be elevated or floodproofed to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure will be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Activities subject to elevation requirements will comply with applicable federal accessibility mandates.

In addition to the other requirements in this section, ADECA will comply with applicable state, local, and tribal codes, and standards for floodplain management, including elevation, setbacks, and cumulative substantial damage requirements for both residential and nonresidential elevation scenarios. As applicable and within its policies and procedures on a program- by-program basis, the State or its subrecipients will document decisions to elevate structures. This documentation will address how projects will be evaluated and how elevation costs will be reasonably determined relative to other alternatives or strategies, such as the demolition of substantially damaged structures with reconstruction of an elevated structure on the same site, property buyouts, or infrastructure improvements to reduce the risk of loss of life and property.

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

- The combined household income is greater than 120% AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

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

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

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance in perpetuity if their properties are located in a FEMA designated floodplain. This requirement is mandated to protect the safety of residents and their property and the investment of federal dollars. ADECA will ensure adherence to Section 582 of the National Flood Insurance Reform Act regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so. Additional Alabama State Building Code requirements may apply in addition to local codes, as applicable

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

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

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

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

For infrastructure projects, ADECA will encourage, to the extent practicable, implementation of Alabama State Building Code and require the implementation of sustainable planning, and design methods that promote adaptation and resilience.

Subrecipients are required to incorporate a Resilient Home Construction Standard for substantially damaged residential buildings or new construction that incorporate a Resilient Home Construction Standard recognized such as those set by the FORTIFIED Home™ Gold Level for new construction or single family, detached homes; and FORTIFIED Home™ Bronze level for repair or reconstruction of the roof; or any other equivalent comprehensive resilient or disaster

resistant building program. Resilient standards when incorporated will increase a home's resilience to natural hazards, including high wind, hail, and tropical storms.

Substantially damaged structures, as determined by the local jurisdiction's floodplain manager, may require additional construction considerations. Substantially damaged structure means a structure in a Special Flood Hazard Area – or floodplain – for which the total cost of repairs is fifty percent (50%) or more of the structure's market value before the disaster occurred, regardless of the cause of damage.

All construction activities will comply with applicable federal accessibility mandates to ensure accommodations for persons with disabilities are implemented when necessary to comply with Section 504 of the Fair Housing Act and/or the Americans with Disabilities Act. Program guidelines will further describe accessibility requirements.

All projects will be subject to cost reasonableness standards as outlined in the policies and procedures of the applicable program specific to the applicable activity.

Dams/Levees

As stated in the Federal Register, CDBG-DR funds are prohibited from being used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event, without obtaining pre-approval from HUD and any Federal agencies that HUD determines are necessary based on their involvement or potential involvement with the levee or dam. ADECA will ensure that if subrecipients use CDBG-DR funds for levees and dams, the subrecipient will follow the following guidance, as outlined by HUD at Federal Register Vol. 87, No. 23 (p. 6375): (1) register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams; (2) ensure that the structure is admitted in the USACE PL 84–99 Program (Levee Rehabilitation and Inspection Program); (3) ensure the structure is accredited under the FEMA National Flood Insurance Program. The Department will upload into the DRGR system the exact location of the structure and the area served and protected by the structure and maintain file documentation demonstrating that the grantee has conducted a risk assessment prior to funding the flood control structure and document that the investment includes risk reduction measures.

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

ADECA will undertake the following efforts to help meet its Section 3 goals:

- Ensure that Section 3 requirements are outlined in all applicable contracts and subrecipient agreements.
- Build the capacity of stakeholders, including subrecipients and contractors, to meet Section 3 standards through technical assistance, tools, and guidance.
- Designate a Section 3 coordinator who will manage, support, and facilitate an effective Section 3 program, and who will be able to effectively communicate program requirements to stakeholders.

ADECA will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Contractors will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1700lu) and implementing regulations at 24 CFR part 75. Contractors selected by ADECA or its subrecipient will ensure, to the greatest extent feasible, that employment and other economic opportunities are directed to low-and very low-income persons, particularly local residents and businesses that meet the qualifications of the project. Contractors will make every effort to recruit, target, and direct opportunities to Section 3 residents and businesses as well as notifying Section 3 residents about training opportunities. ADECA or its subrecipient will provide Contractors with helpful resources to maximize these efforts including, but not limited to, a Section 3 Business Registry, and examples of training and employment opportunities. Contractor procurement procedures will be monitored by ADECA.

Recovery programs implemented by the State of Alabama will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. Construction contractors will be required to carry required licenses, insurance coverage(s) for all work performed, and state-contracted contractors will be required to provide a warranty period for all work performed. Contractor standards will be enumerated for each program (e.g., homeowners and rental property owners) in respective policies and procedures documents and will pertain to the scale and type of work being performed, including the controls for assuring that construction costs are reasonable and consistent with market costs at the time and place of construction. Rehabilitation contract work provided through an ADECA administered program described in this Action Plan may be appealed by homeowners or small business owners (as applicable) whose property was repaired by contractors under the State's control.

ADECA or its subrecipient will require a warranty period post-construction for housing work performed by the contractor to be guaranteed for a period of one year. In addition to this 1-year general warranty for repairs to the home, the following warranties on construction are in place, as applicable:

- 2 years – electrical, plumbing, and mechanical warranty (if such work is performed)
- 10 years – structural warranty (if structural work is performed)

The homeowner will be provided with applicable instruction booklets and warranty information.

Complaints of contractor fraud, such as abandoning a job, will be reported to the OIG. In addition, ADECA will coordinate with the Department of Business and Professional Regulation to address such claims. To safeguard ADECA or its subrecipient, contractors are also required to submit proof of liability insurance and provide performance and payment bonds against the project.

Complaints of poor-quality work and associated issues can be reported to the program either directly to the subrecipient, or through ADECA. Complaints will be received and investigated and addressed with the subrecipient responsible for that project.

All complaints and claims of fraud will be logged in the program's system of record. Any appeals must comply with the policies and procedures of the specific program under which the homeowner or business owner's property was rehabilitated.

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

To integrate hazard mitigation and resilience planning with recovery efforts, ADECA will promote sound, sustainable, long-term recovery planning informed by post-disaster evaluation of hazard risk and the creation of resilience performance metrics.

The purpose of the mitigation activities outlined in this Plan is to detail a strategy that reduces risks and vulnerabilities of people in hazard-prone areas through current technology, reduces the potential impact of natural disasters on new and existing properties, infrastructure, and local economies, and promotes education, outreach and research and development programs to improve the knowledge and awareness among the citizens—particularly vulnerable populations and historically underserved communities—and industry about hazards they may face and mitigation alternatives that can reduce vulnerabilities.

In accordance with the Federal Register Notice, ADECA will ensure that the mitigation measures identified in this Action Plan will align with existing FEMA hazard mitigation plans or other state, local, or tribal hazard mitigation plans. In addition, mitigation measures will be incorporated when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds.

Hazard Mitigation Planning and Mitigation Needs Assessment

This Action Plan details how this funding will be allocated to reduce the effects of natural disasters and eliminate long-term risks to Alabamans. The purpose of a mitigation risk assessment is to detail a strategy that reduces the risks and vulnerabilities of people in hazard prone areas through current technology; reduces the potential impact of natural disasters on new and existing properties, infrastructure, and local economies; and promotes education, outreach, and research and development programs to improve knowledge and awareness among citizens and industry about the hazards they may face and mitigation alternatives that can reduce vulnerabilities.

ADECA has completed a risk-based Mitigation Needs Assessment to identify and analyze all significant current and future disaster risks that provide a substantive basis for the uses of funds proposed in this Action Plan. The assessment utilized the findings of the 2018 Alabama State Hazard Mitigation Plan (SHMP), the most recent risk assessment completed through the FEMA hazard mitigation planning process. The SHMP was completed by the Alabama Emergency Management Agency and focuses on emergency management and the hazards faced by Alabamans and provides a mitigation strategy for the State. The purpose of the SHMP is to reduce death, injuries, and property losses caused by natural hazards in Alabama. The 2018 SHMP identifies hazards based on the history of disasters within the State and lists goals, objectives, strategies, and actions for reducing future losses.

In addition to the SHMP, data and research was acquired from essential data resources, and consultations with public, private, and nonprofit stakeholders were performed to arrive at a thorough assessment of the hazards that pose substantial risk of loss of life, injury, damage, and loss of property, along with suffering and hardship.

ADECA will utilize pertinent information from local agencies to promote sound, sustainable, long-term recovery planning that has been informed through the evaluation of natural hazards. In addition to the efforts described above, ADECA will require that subrecipients consider local hazard mitigation plans and other local planning efforts. ADECA will also consider and incorporate the following established planning initiatives as it responds to the impacts and unmet needs of Hurricanes Sally and Zeta:

- Local Advisory Base Flood Elevations (BFEs) and Flood Insurance Rate Maps (FIRMs)
- Regional hazard mitigation plans
- County hazard mitigation plans
- Economic Development Plans and Strategies from Regional Planning Commissions
- An assessment of local land use plans, zoning and floodplain management ordinances and permit requirements

Resilience That is Reasonable and Cost-Effective

All rehabilitation, reconstruction, and new construction work will be designed to incorporate the principles of sustainability, including water and energy efficiency, resilience, and mitigation against the impact of future disasters. ADECA will encourage its subrecipients to—incorporate preparedness and mitigation measures for rebuilding activities. This helps to ensure that communities build back safer and stronger than before the disaster.

The Local Recovery Housing Competition and Local Recovery Planning program guidelines will require that all new housing units incorporate resilience measures to combat the effects of future disasters. The Local Recovery Planning program provides local governments the ability to make land use decisions to reduce future natural hazard risks specific to their geographical areas. ADECA will establish resilience performance metrics prior to implementation of the program and will require applicants to report on the performance measures for each activity. More information for requirements on cost-effective resiliency measure will be provided in the program guidelines. ADECA will require that subrecipients demonstrate that projects (1) address a problem that has been repetitive or a problem that poses a significant risk to public health and safety if left unsolved; (2) cost less than the anticipated value of the reduction in both direct damages and subsequent negative impacts on the area if future disasters were to occur; (3) have been determined to be the most practical, effective, and

environmentally sound alternative after consideration of a range of options; (4) contribute, to the extent practicable, to a long-term solution to the problem it is intended to address; and/or (5) consider long-term changes to the areas and entities it protects and have manageable future maintenance and modifications requirements. Incorporation of these measures will ultimately result in reduced costs of recovery from future disasters.

Ensuring Community and Stakeholder Awareness

Seeking input from stakeholders and communities around the State is an important component of the planning process. ADECA used a variety of methods to inform local officials and the public on the purpose and goals of mitigation, understanding risks, threats, and hazards in MID areas, and gathering feedback on how to craft programs that will meet the needs of communities as quickly as possible. In addition to gaining feedback, this process helped local stakeholders and members of the public understand what to expect from CDBG-DR funding and allowed them to play a key role in shaping the outcomes of this plan. The outreach methods, along with the feedback obtained, include webinars, a Community Stakeholder Survey, and Regional Stakeholder Meetings.

ADECA is committed to ensuring environmental justice in minority, low-income, refugee, and immigrant populations. Members of these populations are encouraged to participate in outreach efforts by ADECA to provide valuable input on the needs and priorities of these communities. To ensure adequate public participation and access to information as required by Executive Order 12898, ADECA will solicit public recommendations in developing and implementing environmental justice strategies, use public documents that are concise and understandable, and translate appropriate public documents for persons with limited English proficiency.

ADECA also will provide meaningful opportunities for public participation throughout the environmental review process as required by guidance from the Council on Environmental Quality.

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

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

The State will require the review for the feasibility of implementing the requisite broadband infrastructure in the plans and specifications approval process and will perform on-site inspections during construction and post construction to ensure compliance, where applicable.

Cost-Effectiveness.

As a recipient of federal funds, ADECA is responsible for ensuring that the costs of its disaster recovery activities are allowable, reasonable, necessary, and cost-effective. ADECA and its subrecipients will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household under any residential rehabilitation, reconstruction, new construction program, or activity funded by CDBG-DR funds. Those policies and procedures will address criteria for determining when the cost of rehabilitation, reconstruction or new construction is not cost-effective (for example, reconstruction and elevation if the cost of repair exceeds a specified threshold) and address possible alternatives if found not to be cost-effective.

Any exceptions to maximum award limitations are subject to grant fund availability. The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as:

- The process used to analyze the circumstances under which an exception was necessary,
- How the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart E—Cost Principles, and
- Justifying the reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

Duplication of Benefits.

In accordance with the Robert T. Stafford Act, as amended, ADECA will implement policies and procedures to ensure no individual or subrecipient receives CDBG-DR grant funds for the same purpose and/or effect as funding provided through ADECA's CDBG-DR grant. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss as to which they have received financial assistance under any other program, from private insurance, charitable assistance, or any other source.

To prevent a DOB, ADECA will require that all sources (federal, state, local, and private) and amounts of disaster assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding. DOB for CDBG-DR assistance will only consider other sources of funding pertaining to disaster impacts. Prior to program-related construction, applicant awardees must submit any additional funds received for damage caused by the presidentially declared hurricane disaster to the subrecipient to avoid DOB. DOB are statutorily not allowed. CDBG-DR funding must be the funding of last resort. Any additional funds paid to applicant awardees for the same purpose as the assistance awarded after the State has completed the project must be returned to ADECA.

ADECA has adopted a general DOB policy; however, detailed policies and procedures for assessing DOB may vary by program and are therefore included in individual program guidelines. Duplication of Benefits policies and procedures included in program guidelines will follow the guidance outlined in Federal Register Vol. 84, No. 119 (84 FR 28836, “2019 DOB Notice”). When possible, ADECA will electronically verify disaster recovery assistance received through federally and locally maintained datasets, such as FEMA IA and SBA disaster home loan datasets.

4. Grantee Proposed Use of Funds

Overview. ADECA is the lead agency and responsible entity for administering 501,252,000.00 in CDBG-DR funds allocated for disaster recovery. ADECA has prioritized programs that will assist in meeting the short- and long-term needs of impacted citizens and communities, in accordance with the unmet needs analysis and input from community stakeholders. The unmet needs analysis indicates there are unmet needs in three primary recover sectors: (1) Housing; (2) Infrastructure, and (3) Economic Revitalization. ADECA’s program design aims to address these unmet needs and increase resilience against future disasters in impacted community needs.

By far, the largest area of unmet need is in the housing sector, followed by economy, then infrastructure. The State, in partnership with eligible local governments, will deliver a complementary suite of programs to address unmet needs in each sector. Further, the State intends to implement programs that result in mitigation and resilience improvements in impacted areas, creating hardened housing, infrastructure, and communities that can better weather the impacts of future disasters.

Based on the best available data at time of publication, the unmet need in the housing sector accounts for over 90% of the total remaining unmet need in impacted areas. As such, the largest portion of program funding is dedicated to housing recovery efforts, with a specific focus on restoration and hardening of single-family owner- and renter-occupied units. Proposed housing activities are further described in the program description section below.

Although the unmet needs analysis revealed only a small portion of unmet needs in the economic revitalization and infrastructure sectors, feedback from public hearings, listening sessions, and damage assessments conducted by ADECA revealed infrastructure and economic development programming to be a top priority for impacted communities. In an effort to deliver a comprehensive recovery, the State has dedicated allocations to funding to both sectors in response to this feedback. Failing to adequately address needs in these sectors would be to neglect to recognize the cascading impacts of disaster and interconnected nature of housing, infrastructure, and economy.

Because the State understands that available data on infrastructure impacts and unmet needs is preliminary, and because local stakeholders have indicated a strong need for infrastructure and/or mitigation activities, a portion of grant funds greater than the percentage of unmet needs has been dedicated to the infrastructure sector.

Up to five (5) percent of the overall grant allocation will be used to cover costs associated with administration of the grant. Funds have been allocated to the administration budget to fund activities such as planning for, monitoring, and managing the CDBG-DR grant.

To maximize the amount of funds that benefit storm impacted communities, the State will not allocate the full fifteen (15) percent of grant funds to planning activities, as allowed by HUD. Instead, up to four (4) percent of the overall grant is set aside for planning activities. Planning activities include initiatives such as studies, analyses, and additional planning and capacity building efforts to aid eligible local government partners to develop additional recovery and resilience programs and initiatives. Planning funds may also support the design and implementation of disaster recovery initiatives outlined in this Action Plan.

As required by the Federal Register, the State will spend a minimum of 80% of the total allocation in the HUD-identified MID areas of Mobile, Baldwin, Clarke, and Escambia Counties. Remaining funds may be used to carry out eligible activities in State-Designated MID areas. Additionally, no less than 70% of the total allocation will be expended to benefit Low- to Moderate-income persons. All proposed programs will include some disaster recovery related mitigation initiatives, as well as allow for stand-alone mitigation activities to ensure the State complies with the 15% mitigation expenditure target.

The State will implement the Home Recovery Alabama Program (HRAP) and the Local Planning Recovery Program (LRP). Subrecipient partners will deliver other housing, infrastructure, and economic revitalization recovery efforts, to be further defined as an outcome of local planning efforts. All programs outlined in this program are subject to funding availability.

Program Budget

The budget table included below outlines how funds are allocated across each initiative described above. Funding will be used to address all three (3) HUD National Objectives, which are abbreviated in the table as follows:

- Low-to Moderate-Income: LMI
- Elimination of Slum and Blight: SB
- Meet an Urgent Need: UN

a. Program Budget

| Program Category | Program | Budget | HUD identified MID Budget | Grantee identified MID Budget | % of Allocation | Maximum Award | National Objective | Estimated Outcome |
|-------------------------|--------------------------|-------------------------|---------------------------|-------------------------------|-----------------|---------------|--------------------|-------------------|
| Housing | Rehab | \$280,000,000.00 | \$266,000,000.00 | \$14,000,000.00 | 55.86% | \$350,000.00 | LMI | 0 |
| | Buyout | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | New Construction | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$84,911,456.00 | \$54,911,456.00 | \$30,000,000.00 | 16.94% | \$0.00 | LMI, SB, UN | 0 |
| Economic Revitalization | Workforce Training | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Business Grants | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$22,806,966.00 | \$17,244,769.00 | \$5,562,197.00 | 4.55% | \$0.00 | LMI, SB, UN | 0 |
| Infrastructure | Water/sewer Improvements | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Health Facilities | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$68,420,898.00 | \$51,734,306.00 | \$16,686,592.00 | 13.65% | \$0.00 | LMI, SB, UN | 0 |
| Public Services | Legal Services | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Housing Counseling | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| | Other | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| Mitigation | Mitigation | \$0.00 | \$0.00 | \$0.00 | 0.00% | \$0.00 | 0 | 0 |
| Admin | Admin | \$25,062,600.00 | \$0.00 | \$0.00 | 5.00% | \$0.00 | 0 | 0 |
| Planning | Planning | \$20,050,080.00 | \$0.00 | \$0.00 | 4.00% | \$0.00 | 0 | 0 |
| Total | | \$501,252,000.00 | \$389,890,531.00 | \$66,248,789.00 | 100.00% | | | |

Data Source(s): ADECA Action Plan

Connection to Unmet Needs. As required by the 87 FR 6364, and 87 FR 31636, ADECA will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a Hurricane Sally and Hurricane Zeta presidential major disaster declaration.

This Action Plan primarily considers and addresses housing, infrastructure, and economic development unmet needs along with mitigation activities incorporated in all programs. The allocations for each recovery program are based on the Unmet Needs Analysis, which identified unmet needs in the areas of housing, economy, and infrastructure. ADECA also performed a Mitigation Needs Assessment to inform activities proposed for the mitigation funding requirement.

At least seventy percent (70%) of all program funds will benefit LMI persons or households. As most of the programs submitted in the Action Plan are either limited to benefitting LMI persons or prioritize assisting LMI persons in accessing programs, the State anticipates meeting the requirement. The State will also be assessing the status of eligible unmet needs of LMI persons and non-LMI persons and determining, at an appropriate stage, whether to request a modification of the requirement.

The table above shows a breakdown of the unmet needs and budget allocations per sector. The unmet needs for housing accounts for 92% of the total unmet needs and ADECA has allocated 80% of grant funding to housing. Due to the comments ADECA received from county stakeholders regarding the impacts Hurricanes Sally and Zeta had on local infrastructure, the State has allocated additional funding towards infrastructure to address these concerns.

Leveraging Funds.

To maximize the impact of the CDBG-DR funding provided to the State, there will be an ongoing commitment by ADECA to identify and leverage other federal and non-federal funding sources. ADECA understands the importance of leveraging all available funds to maximize the effectiveness of comprehensive recovery efforts and increase its ability to address and mitigate against major disasters.

ADECA will leverage CDBG-DR funds with other funding sources such as FEMA and other state and local funds. ADECA will maximize relationships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of leveraging all viable sources of funding. In addition, to ensure coordination in funding and activities, ADECA will utilize inter-agency partnerships to ensure that information, program updates, and data are shared when necessary.

The CDBG-DR funds will be used to address critical unmet needs that remain after all other sources have been committed and exhausted to prevent any duplication of benefits. The activities identified in this Action Plan were specifically selected as both eligible CDBG-DR activities and filling a gap that other funding sources could not fill. Specific efforts to leverage other funds and programs are as follows:

Housing

ADECA has designed the housing programs in this action plan to cover the gap funding needed by leveraging funds from insurance, FEMA, SBA, private and nonprofit entities, other assistance to complete the repairs from Hurricanes Sally and Zeta. The housing programs may also leverage CDBG-DR funds with funds that include but are not limited to the following programs: Low-Income Housing Tax Credit (LIHTC), HOME, Permanent Supportive Housing, and Continuum of Care.

Economic Development

ADECA will combine funding to address economic development unmet needs from other federal funding sources such as SBA loans, NFIP, non-disaster CDBG funding, USDA, and the U.S. Department of Commerce. Non-federal resources such as local and state economic development public funds, as well as private financing and equity investments, will provide additional leverage to disaster recovery funds.

Infrastructure

ADECA will combine funding to address infrastructure unmet needs from other federal funding sources such as non-disaster CDBG funding, USDA, and FEMA PA and HMGP. Additional non-federal resources such as local and state public funds will provide additional leverage to these disaster recovery funds. By encouraging local governments to use CDBG-DR to cover the required local match for the FEMA programs, communities will be able to maximize both funding sources.

Program Partners.

During the implementation of this grant, ADECA may enlist program partners through formal agreements such as subrecipient agreements and interagency agreements and through informal partnerships. If needed, ADECA will engage a broad array of program partners so that programs are accessible and tailored to equitably meet the unmet needs of disaster-impacted residents and communities.

ADECA will ensure that any selected subrecipients have the capacity and expertise to carry out the program activities included in their scope of work. If needed, ADECA may allocate administrative funding, as appropriate, to assist in improving subrecipient capacity by providing technical assistance and training to subrecipients on program requirements, applicable federal and state cross-cutting requirements, and reporting and performance requirements.

The program descriptions include the types of subrecipients or interagency partnerships that may support ADECA in the administration or implementation of specific programs.

Distribution of Funds.

ADECA will implement a hybrid method of distribution (MOD) inclusive of a state-administered housing rehabilitation/reconstruction program, a planning program, a formula allocation to the Hardest Hit MID (HHMID) areas, and competitive allocations for non-HHMID counties.

The MOD described herein will support the recovery of residents and businesses by supporting the critical recovery areas of housing, infrastructure, and economic revitalization, while prioritizing MID areas and LMI households and serving the most vulnerable and hardest to reach populations impacted by the hurricanes. ADECA will continue to update the unmet needs assessment as needed, and through this continued assessment may allocate funds to additional subrecipients.

Direct Housing Rehabilitation/Reconstruction Program – “Home Recovery Alabama Program” (HRAP) - \$280M

As described in the unmet need analysis, over 90% of all remaining unmet needs are related to housing. Approximately 80% of FEMA IA applications received across impacted areas are for typical single family housing types (house/duplex or mobile home). To address the overwhelming single family housing recovery need, ADECA will allocate nearly 77% of allocated housing funds to a state-administered single-family rehabilitation/reconstruction program that addresses the unmet needs of impacted households that reside within all MID and State-MID counties. The percent of funding allocated to this single-family housing recovery initiative is proportionate to the percentage of traditional single-family housing applications received by FEMA IA.

The housing program includes activities such as repair, rehabilitation, and reconstruction of owner and renter occupied units; replacement of substantially damaged Manufactured Housing Units; relocation assistance; inclusion of mitigation and resilience measures, and related public services, as needed.

Local Recovery Planning (LRP) - \$10M

ADECA will provide funding to MID counties to develop Local Recovery Plans (LRPs), with the intent of developing plans that describe the intended uses of funds for review and approval by ADECA (formula subrecipients) or a plan that describes the greatest needs and develops a list of projects that may then be submitted during the competition phase (competition subrecipients). All plans must demonstrate extensive local outreach; ensure collaboration with local governments, non-profits, and other stakeholders; and adequately demonstrate the subrecipient's capacity to administer programs or activities described in the plans. The successful development and approval of a LRP is required prior to the implementation of subrecipient recovery activities.

Hardest Hit MID (HHMID) Formula Allocations - \$123.8M

The unmet needs analysis revealed nearly all remaining unmet needs across all sectors are located within Mobile and Baldwin Counties. These two (2) counties account for nearly 93% of all remaining unmet need across all sectors. When considering storm impact in Mobile County, the City of Mobile suffered disproportionate impacts compared to other areas within the County. The City of Mobile accounts for 61.7% of the real property loss verified by FEMA and applicants in City of Mobile account for 71% of all FEMA IA applications submitted in Mobile County. The table below shows all unmet needs in each MID county by recovery category.

To respond to the needs of these Hardest Hit MIDs (HHMIDs) and ensure recovery dollars are expended in geographic areas with the highest storm impacts, the State has chosen to allocate funding directly to the HHMID areas, with funding in Mobile County distributed between the City of Mobile and Mobile County. Recovery in HHMIDs will be aided by the Home Recovery Alabama Program (HRAP), which will support the single-family housing recovery in the HHMID areas.

The HHMID areas of the City of Mobile, Baldwin and Mobile Counties will receive funding through a formula allocation, described in detail below.

HHMID Allocation Formula

The State has set-aside direct funding allocations for Baldwin and Mobile counties in the amount of \$123.8 million. Mobile County will receive \$80.5 million, split between Mobile City (\$52 million) and Mobile County excluding Mobile City (\$28 million). Baldwin County will receive \$43 million.

The formula used to calculate the direct allocation of funding to Baldwin and Mobile Counties uses the average of the following factors: Percent of population, Percent of remaining Unmet Needs, and Percent of Medium and High SoVi population. As a result of this formula, 65% of funding has been allocated to Mobile County, and 35% to Baldwin County.

The formula used to calculate the split allocation between Mobile City and Mobile County uses the average of the following factors: Percent of Real Property FEMA Verified Loss (RPFVL) and the Percent of Medium and High SoVi Population. As a result of this formula, Mobile City will receive 65% of the total funding allocation for Mobile County. Mobile County, excluding Mobile City, will receive 35% of the total funding allocation for Mobile County.

Based on the formula calculation, Mobile County, Mobile City, and Baldwin County will receive:

- Mobile County, excluding Mobile City, will receive \$15.6 million for infrastructure and economic development, and \$12.4 million for housing.
- Mobile City will receive \$29.1 million for infrastructure and economic development, and \$23.2 million for housing.
- Baldwin County will receive \$24.1 million for infrastructure and economic development, and \$19.2 million for housing.

These allocations will be available for a wide range of eligible activities to address unmet housing, infrastructure, economic development, mitigation, and other eligible unmet needs, as described in each subrecipient's Local Recovery Plan. HHMID subrecipients must align local recovery budgets by recovery category with unmet needs described in this Action Plan, unless a Local Recovery Plan proposes an alternative unmet needs analysis and budget allocation that is adequately supported by the best available local data.

Examples of eligible activities include, but are not limited to, affordable multifamily rental housing, first-time homebuyer assistance, voluntary buyout, rental assistance, construction or rehabilitation of storm water management systems, resilience measures for critical facilities, public facility improvements, and workforce training and development. Single-family rehabilitation activities will be ineligible.

MID Competitive Allocations - \$52.2M

All MID counties outside the HHMID areas will be eligible to submit projects and/or activities through a competitive process. There will be two competitive processes, one for housing activities and one for non-housing activities. Although the remaining unmet needs in the remaining MID areas (Clarke and Escambia) and the State-designated MIDs (Dallas, Washington, Wilcox, Marengo, and Perry) accounts for approximately 7 percent of the total unmet needs, the State determined that this proportion of grant funds was not sufficient to adequately address the need through these areas. Therefore, the State designated 10 percent of grant funds to address the disaster recovery and mitigation needs in these communities.

Housing - \$30M

This competition will seek to achieve the goals of improving/increasing the local affordable housing stock, improving housing security, and enabling households to move out of harm's way. The housing competition will allow for the submission and selection of CDBG-DR eligible activities such as affordable multifamily rental housing, first-time home buyer assistance, and voluntary buyout. Single-family rehabilitation and reconstruction will not be eligible.

Non-Housing \$22.2M

This competition will seek to achieve the goals of improving critical infrastructure, assisting in the recovery of commercial areas, providing critical public services, and increasing resilience for future disasters. Eligible activities under the non-housing competition may include, but are not limited to, flood control and drainage repair and improvements, resilience measures for critical facilities, public facility improvements, workforce training and development, façade improvements, housing counseling, and assistance to small businesses through grants or physical improvements.

Budgets for competitive allocations are split by recovery sector, with separate competitive allocations available to address unmet housing, and eligible non-housing needs in impacted communities. The table below outlines the funding distribution for competitive allocations, by recovery sector.

Program Income.

ADECA understands that when implementing certain activities with CDBG-DR funds there is the potential for generating program income. In the event a program involves program income, ADECA shall develop and adopt specific policies and procedures and will specify in those policies whether program income may be retained by local governments, if applicable. These amounts will be recorded and tracked in the State accounting systems and recorded in the DRGR system. Up to five percent (5%) of the program income generated by CDBG-DR funds may be used for administrative costs by ADECA, units of local government, or other subrecipients.

Unless otherwise specified in the program guidelines or delineated in subrecipient agreements, all program income shall be remitted to the State. To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Department of the Treasury are made. Grant funds are not allowed to be drawn until all program income has been expended. Program income will be treated as additional CDBG-DR funds subject to the requirements of the applicable Federal Register Notice and must use it in accordance with the disaster recovery action plan.

Subrecipients will be required to report program income quarterly and will be subject to applicable rules, regulations, and HUD guidance.

If any program income remains at program closeout, the Department may return these funds to HUD or transfer the balance to the State's annual CDBG program, as allowable per HUD.

Resale or Recapture.

A CDBG-DR award recipient may be required to repay all, or a portion of the funds received. The reasons for recapture include, but are not limited to, the following:

- An applicant is determined to have provided false or misleading information to ADECA or its subrecipient,
- An applicant withdraws from the program prior to completion of the project,

- An applicant does not complete construction,
- An applicant does not report the receipt of additional insurance, SBA, FEMA, non-profit assistance, and/or
- Any other DOB received after calculation of the award, and / or
- An applicant voluntarily or involuntarily relinquishes ownership of the property prior to the successful completion of a final program inspection.

ADECA shall establish resale or recapture requirements for programs funded and shall outline those requirements in the program guidelines for the activity. The resale and recapture provisions must clearly describe the terms of the resale and recapture, the specific circumstances under which these provisions will be used, and how the provisions will be enforced (whether by recorded deed restrictions, covenants, or other similar mechanisms). The affordability restrictions, including the affordability period requirements, do not apply to housing units newly constructed or reconstructed for an owner-occupant to replace the owner-occupant's home that was damaged by the disaster.

Obligations and means of enforcement for non-housing programs will vary depending on the nature of the grantee (i.e., public, or private entity), purpose, and amount of funds; all of which are subject to federal and state laws, regulations, and terms and conditions associated with the grant.

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

Pre-Agreement Costs

ADECA may seek reimbursement for pre-agreement costs after the effective date of the grant agreement. Pre-agreement costs could include the costs for salaries, benefits, and direct operating expenses of ADECA that were used for the planning of the CDBG-DR programs. Other pre-agreement costs could include activity delivery and projects costs associated with eligible disaster recovery programs identified within this Action Plan.

Moreover, the State may request reimbursement for certain eligible pre-award costs necessary for the efficient and timely implementation of its recovery programs. These costs may include environmental review, damage assessment and other costs necessary for determining eligibility of housing related projects. The State will also work with non-governmental entities working to fund housing recovery through short term, private and philanthropic loan funds intended to jump start critical housing recovery programs for at risk populations.

Outreach and Engagement

ADECA followed HUD's guidance on facilitating equitable engagement, by engaging with community partners, including them in the decision-making, and changing Action Plan program design based on their input.

As outlined in the Outreach and Engagement section of this Action Plan, the State reached out to numerous stakeholders in the impacted areas, including local governments, state agencies, the MOWA Choctaw Indians, non-governmental organizations, and public housing authorities, among other entities, to solicit feedback and inform the disaster recovery programs summarized in this action plan.

Additionally, ADECA held two public hearings on September 12 and 13, 2022 in Baldwin and Mobile counties (both HUD-identified MID areas), respectively, as well as an all-day listening session with community partners in Mobile (City) August 10, 2022, to inform the Action Plan, as well as the types of recovery programs ADECA should seek to implement.

To further ADECA's practice of equitable engagement, ADECA is allocating planning funds to eligible jurisdictions to engage in the community planning process to engage, more locally, communities and vulnerable populations to inform its recovery and mitigation unmet needs and identify projects that will equitably benefit those communities. In order for jurisdictions to administer programs through the direct allocation of funds or the housing, infrastructure and economic development competitions, jurisdictions will be required to have completed, submitted, and have an ADECA-approved Local Recovery Plan.

b. Program Details.

The State of Alabama's Community Development Block Grant – Disaster Recovery (CDBG-DR) funding will be allocated as shown on the preceding pages and as described below. The allocation awards will be announced on ADECA's website and through distributed public notifications. [Recovery Program \(H](#)

For a more detailed narrative of the considerations taken for method of distribution, see Distribution of Funds section above.

Home Recovery Alabama Program (HRAP)

- Exceptions to the maximum award caps may be made on a case-by-case basis. These exceptions may include but are not limited to additional funding necessary to comply with federal accessibility standards or reasonable accommodation for persons with disabilities. Any exceptions will be provided in accordance with the State's adopted exceptions policy.

HURRICANE IMPACT

The impacts of Hurricane's Sally and Zeta on homes in the impacted areas are estimated to be nearly \$750 million. The housing stock suffered damage from flooding, rain, and wind, impacting homes from the ground up, leaving homes severely damaged, families living in substandard or unsafe conditions or even displacing them from their communities. These storm impacts affected both Owner-Occupied housing, and Rental-Occupied housing.

ELIGIBLE ACTIVITIES

Section 105(a)(1), 105(a)(3), 105(a)(4), 105(a)(8), 105(a)(11), 105(a)(18), 105(a)(25)

- Single-family owner-occupied rehabilitation, reconstruction, or new construction
- Repair and replacement of manufactured housing units
- Hazard mitigation
- Elevation
- Relocation assistance
- Demolition only
- Public service (e.g., housing counseling, legal counseling, job training, mental health, general health, etc. (fifteen percent (15%) cap))
- Administrative activities associated with recovery of single-family housing stock

PROGRAM PRIORITIES

Applications for owner-occupied households will be prioritized based on specific income and vulnerability factors, as follows:

1. LMI (80% AMI and below) and
 1. Age-dependent household member(s) AND
 2. Household member(s) with a documented disability
2. LMI (80% AMI and below) and
 1. Age-dependent household member(s) OR
 2. Household member(s) with a documented disability
3. LMI (80% AMI and below)

For the purposes of program priorities, age-dependent households are defined as households including members greater than or equal to 65 years old and/or less than or equal to 17 years old.

ELIGIBILITY

The Home Recovery Alabama Program (HRAP) will offer pathways to assist both owner-occupied and rental housing units. Eligibility criteria for owner or renter pathways will be slightly different. Both are described below.

Owner-Occupied Housing Units

- The owner must have owned the home at the time of the qualifying disaster and at time of application. If the property is part of a multi-unit structure, such as a duplex, the applicant must own the entire structure
- The owner must have occupied the home as their primary residence at the time of qualifying disaster
- The home must be in a HUD- or State-identified MID area
- The home must have unrepaired damaged as a result of the qualifying disaster
- The structure must be a single-family dwelling, such as a stick-built, modular, or mobile home
- Property taxes current and mortgage (if applicable) must be in good standing

Rental Property Applicants

Property owners do not have to reside in the state at the time of application to be eligible.

Rental property and applicants must meet all criteria listed below to be eligible for program funding:

- Applicant must not be in bankruptcy or active foreclosure.
- Property taxes current and mortgage (if applicable) in good standing
- The owner must have owned the home at the time of the qualifying disaster and at time of application. If the property is part of a multi-unit structure, such as a duplex, the applicant must own the entire structure
- The home must be in a HUD- or State-identified MID area
- The home must have unrepaired damaged as a result of the qualifying disaster
- Property must be an eligible structure type; such as a stick-built, modular, or mobile home
- Properties must be unoccupied at the time of application
- At least fifty-one percent (51%) of units must be occupied by certified LMI households if awarded program funds

METHOD OF DISTRIBUTION

ADECA will administer the Home Recovery Alabama Program directly. Units of local government may partner with ADECA to support outreach activities within their jurisdiction.

PROGRAM OBJECTIVE & DESCRIPTION

To assist the most vulnerable and impacted households, the State will directly implement the **Home Recovery Alabama Program (HRAP)** to meet the housing needs identified in the unmet needs assessment. This housing program may include:

1. Repair, Rehabilitation and Reconstruction of existing Owner- and Renter-Occupied housing units,
2. Replacement of storm-damaged Manufactured Housing Units (MHU),
3. Inclusion of needed and appropriate mitigation and resilience measures, including but not limited to elevation, roof reinforcement, or floodproofing.

The State of Alabama will require construction methods, standards, and materials that are quality, durable, energy efficient, sustainable, and mold resistant. All rehabilitation, reconstruction, and new construction will meet all applicable state and local building codes, in addition to any minimum construction standards required under the Federal Notice (87 FR 31647). For instance, for all reconstruction, new construction or substantially improved structures, the State of Alabama will require new construction to meet a Green Building certification standard.

For any non-substantially damaged or improved structures, the State of Alabama will use HUD's CPD Green Building Guidelines and apply them to rehabilitation work to include the use of mold resilient products. Additionally, if older or obsolete products are replaced due to rehabilitation work, the State of Alabama will use products and appliances designated ENERGY STAR, WaterSense or Federal Energy Management Program (FEMP).

All housing activities will be required to, at a minimum, meet applicable and current HUD Housing Quality Standards (HQS). The State of Alabama will define "not suitable for rehabilitation" in the program guidelines.

Hazard mitigation and long-term resilience is a priority for the program; therefore, it may fund any necessary and appropriate mitigative, or resilience measure to that end. In addition to funding physical resilience measures, the program may provide assistance to eligible applicants for the initial purchase of required flood insurance coverage of the property for a duration up to the required occupancy period. Through this type of assistance, the homeowner will remain compliant with Federal flood insurance requirements during the initial occupancy period and provide necessary protection to the property for future disasters. During the period, it is expected that the homeowner will assume responsibility of the flood insurance premium to remain compliant after the initial term.

The State of Alabama will not distribute funds directly to eligible applicants. The intent of the program is to repair or replace damaged housing stock throughout the impacted areas. To that end, the State will directly manage all construction activities funded by this CDBG-DR allocation through the State procured construction contractor(s).

The primary objective of the program is the provision of decent, safe, and sanitary housing in the areas impacted by the disasters. The program is designed to ensure that the housing needs of extremely-low, very-low, low- and moderate-income households, protected classes, and vulnerable populations, including individuals that were made homeless as a result of the disasters, are addressed to the greatest extent feasible, including preventing these populations from experiencing homelessness. The program will address disaster-related damages, unrelated improvements to bring properties up to HUD Housing Quality Standards (HQS), if needed, and may mitigate potential future damage.

The program will provide grant funding to eligible homeowners and rental property owners in impacted areas to repair, reconstruct, or replace their storm-damaged property in place. Eligible property types may include stick-built homes, mobile home units (MHU), modular homes, and other single-family residence types. Grant funds will be used to pay for the cost of construction activities directly to program-selected general contractors. No funds will be distributed directly to homeowners.

AFFORDABILITY COMPLIANCE PERIOD AND AFFORDABLE RENTS

All assisted small rental properties (1-4 units) must be restricted to lease only to low- and moderate- income households (those households that do not exceed 80% of the Area Median Income (AMI)) at affordable rent rates during the affordability period of five years. Affordable rents are rents that do not exceed the lesser of either the High HOME Rent Limits adjusted for the number of bedrooms in the unit, and location of the property or thirty percent (30%) of the adjusted gross income of household.

For all assisted owner-occupied units, the applicant must agree to own and occupy the assisted property for 3 years after completion. Exceptions may be made for extenuating circumstances on a case-by-case basis as determined by ADECA.

Local Recovery Planning Program (LRP)

HURRICANE IMPACT

Robust local planning efforts are integral to the identification of planning programs and/or projects that address remaining localized unmet needs. LRP will ensure that adequate community engagement and outreach efforts occur, including consultation and collaboration with local governments, nonprofits, advocacy groups and other impacted stakeholders, especially those that cater to vulnerable populations. These plans will be submitted to ADECA for review and approval prior to the implementation of local recovery efforts to ensure proposed programs/activities are eligible, address unmet recovery or mitigation needs, and adequately serve LMI and vulnerable populations, including persons with disabilities.

ELIGIBLE ACTIVITIES

Eligible planning activities within this program are limited to: Section 105(a)(12) – Planning Activities

Program funds are restricted to planning activities only, including capacity building and development of local implementation plans. Counties must submit and receive approval of local recovery plans prior to submitting projects under the competitive programs or receiving funding for direct formula allocations.

ELIGIBILITY

Baldwin, Clarke, Dallas, Escambia, Marengo, Mobile, Perry, Washington, Wilcox Counties, and the City of Mobile.

METHOD OF DISTRIBUTION

The State may select an eligible nonprofit or nongovernmental organization, as a subrecipient, to act as an administering entity of the Local Recovery Planning Program. This administering entity may support individual subrecipients, and/or a consortium of subrecipients, as described in the program guidelines.

Formula Allocation Subrecipients

Baldwin and Mobile Counties and the City of Mobile, as formula allocation grantees, will be required to develop and submit a LRP to the State for review and approval. These plans must include a set of eligible recovery programs and/or projects to be implemented using the formula allocation based on data and outreach resulting from the planning process. LRPs must also demonstrate adequate local capacity to implement proposed programs and/or projects as a condition of approval.

Competitive Allocation Subrecipients

Counties that are eligible to participate in the competitive housing and non-housing programs will be required to submit a LRP to the State. These plans must identify projects that are eligible for submission to the competitive programs. All projects submitted during the competitive process must have been identified in the local recovery plan. LRPs must also demonstrate adequate local capacity to implement proposed programs and/or projects as a condition of approval. Counties may choose to execute intergovernmental agreements or establish a consortium to create economies of scale, enhance capacity, and ensure cross-jurisdictional recovery projects are considered. The State may also elect to establish a consortium of eligible counties and/or municipalities.

PROGRAM OBJECTIVE & DESCRIPTION

Planning efforts are critical to positioning counties by understanding the recovery, resilience and mitigation needs of their communities through direct outreach to local partners, identification of and engagement with priority populations, support of regional collaboration, and pinpointing the necessary components required to successfully implement disaster recovery and mitigation projects. This process is intended to assist the counties with engaging the community and identifying the most impactful programs and/or projects to address community unmet needs through the development of a Local Recovery Plan (LRP).

The intent of the LRP is to:

- Develop local recovery plans (LRP) for eligible uses of available CDBG-DR funds, ensuring local input, greatest unmet needs and needs of hard to reach/vulnerable populations are addressed.
- Allow counties, either individually or through a consortium led by a nonprofit or nongovernmental entity, to conduct an introspective capacity assessment and develop an implementation plan to ensure subrecipients will have the capacity to implement proposed projects. These assessments will help locals effectively identify necessary internal and external resourcing (staff hiring or consultant) needs, procurement activities and responsibilities, fiscal obligations, and receive or pursue technical assistance.
- Identify programs and/or projects that address immediate recovery needs while further positioning communities to pursue long-term mitigation actions at scale.

ADVANCING LONG-TERM RESILIENCE

This program is designed to promote sound, sustainable long-term recovery plans and programs and/or projects that account for the unique hazards, opportunities, vulnerabilities, and disaster impacts within Alabama's MID disaster impacted counties.

Formula Method of Distribution

- Activities carried out using Urgent Need as the National Objective will be required to provide detail as to what is the urgent need, why it is of specific urgency, and how the conditions pose a serious threat to the health and/or welfare of the community. Documentation will also require direct applicability to the unmet needs assessment, including urgency, type, scale, and location of the disaster-related impact.

HURRICANE IMPACT

Programs and/or projects must either have a demonstrable tie-back to the impacts from Hurricanes Sally and/or Zeta and address an unmet need or implement projects that mitigate activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

ELIGIBLE ACTIVITIES

Eligible activities within this program may include all community development activities under section 105(a) of the Housing and Community Development Act of 1974 (as amended), applicable waivers identified in applicable Federal Register notices, with the exception of single-family housing rehabilitation/reconstruction activities.

ELIGIBILITY

Eligible applicants and programs will be described in the approved local recovery plans.

INELIGIBLE ACTIVITIES

ADECA has allocated more than 50 percent of its grant to the direct-run single-family housing program; therefore, single-family owner-occupied and rental housing rehabilitation/reconstruction activities will be ineligible.

METHOD OF DISTRIBUTION

Formula Model

AWARD ALLOCATION BREAKDOWN

ADECA has allocated a total of \$123,890,531 to three subrecipients – the City of Mobile, Baldwin County, and Mobile County – on a formula basis to implement this program and assist with meeting residents' unmet housing, infrastructure, economic, mitigation, and other needs in the two most-impacted MID areas.

PROGRAM OBJECTIVE & DESCRIPTION

This subrecipient-administered program will allow for the local implementation of a wide range of housing, infrastructure, economic development, and mitigation activities, based on the needs of the State's Hardest Hit MID (HHMID) subrecipients—the City of Mobile, Baldwin County, and Mobile County.

Each subrecipient will be required to develop an individual Local Recovery Plan (LRP) as detailed in the Planning Program section of this action plan that identifies and describes the activities that will be eligible for funding using this formula allocation. ADECA will approve each subrecipient's LRP prior to the implementation of recovery activities. Subrecipients will be allowed to fund programs and/or projects identified in the LRP and approved by ADECA, giving preference to programs and/or projects that are prioritized as described in the program guidelines.

ADVANCING LONG-TERM RESILIENCE

Subrecipients will be required to demonstrate in their program guidelines how the proposed programs and/or projects will be operated and maintained beyond the life of the CDBG-DR grant. This program is designed to promote sound, sustainable long-term recovery that accounts for the unique hazards, opportunities, and disaster impacts within the State's impacted communities and will aid the State by replacing damaged or destroyed housing with stock that is more energy-efficient, and resilient to flood hazards and the projected impacts of climate change.

Program guidelines will require that all new housing units incorporate resilience measures to combat the effects of future disasters.

ADECA will establish resilience performance metrics prior to implementation of the program and will require applicants to report on the performance measures for each activity.

Addressing Disaster-Related Systems

Subrecipients will be required to address disaster-related systems in their local recovery plans.

Any construction of new stormwater management systems will be required to contain mitigation components that help protect against the future loss of life and property and can withstand future disasters and the impacts of climate change.

PROMOTING EQUITY IN HOUSING FOR VULNERABLE POPULATIONS

When designing programs and approving LRPs, ADECA will encourage the subrecipients to draw on analysis from ADECA's 2020 report that details the impediments to fair housing choice in Alabama. The 2020 analysis identified that Black and Hispanic households in the State have disproportionate rates of housing problems, and that disability was the number one housing basis for complaints with cause—between 2004 and 2014. Additionally, failure to provide reasonable accommodation accounted for the second largest number of issues for fair housing complaints during this period, according to the March 2020 report.

Discriminatory patterns in lending are a factor that was cited as contributing to impediments in multiple areas, including R/ECAPs, disproportionate housing need, and fair housing outreach and enforcement. Due to this barrier to homeownership, the possibility that the program could have an unjustified, discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs does exist.

To address this, ADECA has allocated sufficient funding to this program to aid qualified renters in accessing affordable homes. See section 8.3.10 Affordability Period and Affordable Rents for more information on how ADECA defines affordable rents.

The State will require awardees and subrecipients to complete training modules including but not limited to Fair Housing and Equal Opportunity, Minority- and Women-Owned Businesses, Section 3 to ensure prevention of discriminatory practices and failure of benefits reaching protected groups and vulnerable populations. These plans will include templates and technical assistance for subrecipients to assist them in being compliant with program requirements consistent with the Action Plan. The State will require subrecipients to consult with organizations that advocate on behalf of members of protected classes, vulnerable populations, and underserved communities to ensure that the proposed recovery programs align with both the communities' needs and the State's obligation to affirmatively further fair housing —when conducting their outreach and engagement activities.

Subrecipients will be required to include in their local recovery plans examples of how their actions can be expected to equitably benefit protected class groups, including racial and ethnic minorities, and sub-geographies in which residents belonging to such groups are concentrated. Additionally, subrecipients will be required to include examples of how the programs may overcome prior disinvestment in infrastructure and public services for protected class groups.

AFFORDABILITY PERIOD AND AFFORDABLE RENTS

If eligible activities result in the new construction of affordable rental housing of five or more units, CDBG-DR assisted units must be rented to low- and moderate-income households with incomes that do not exceed 80% area median income. Additionally, ADECA defines affordable rent not to exceed the lesser of either the High HOME Rents for the area and unit size or rent that does not exceed 30 percent of the adjusted gross income of the household. CDBG-DR

assisted units must meet the affordability periods below:

The enforcement of these affordability requirements will be through the registration of restrictive covenants, or other similar legal mechanism recorded to the property for the affordability period.

Local Recovery Housing Competition

- Exceptions to the maximum award caps may be made on a case-by-case basis. These exceptions may include, but are not limited to additional funding necessary to comply with federal accessibility standards or reasonable accommodation for persons with disabilities. Any exceptions will be provided in accordance with the State's adopted exceptions policy.
- Activities carried out using Urgent Need as the National Objective will be required to provide detail as to what is the urgent need, why it is of specific urgency, and how the conditions pose a serious threat to the health and/or welfare of the community. Documentation will also require direct applicability to the unmet needs assessment, including urgency, type, scale, and location of the disaster-related impact.

HURRICANE IMPACT

Programs and/or projects must either have a demonstrable tie-back to the impacts from Hurricanes Sally and/or Zeta and address an unmet need or implement projects that mitigate activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

ELIGIBLE ACTIVITIES

Eligible activities within this program may include but are not limited to the following: Section 105(a)(1), 105(a)(3), 105(a)(4), 105(a)(8), 105(a)(11), 105(a)(18), 105(a)(25).

Activities within this program may include, but are not limited to the following:

- Affordable Multi-Family Rental Housing
- First-time Homeowner/Homebuyer Assistance
- Voluntary Buyout
- Interim Housing Assistance/Rental Assistance
- Relocation Assistance
- Housing Counseling

ELIGIBILITY

Counties in HUD or State-Designated MID areas (excluding Mobile County or Baldwin County). Local governments, non-profits, or government agencies may work with their respective County to propose projects or programs.

INELIGIBLE ACTIVITIES

Ineligible activities within this program may include but are not limited to the following:

- Rehabilitation and reconstruction of single-family residences
- Creation of a secondary housing unit attached to a primary unit
- Installation of luxury items, such as a swimming pool
- Costs of equipment, furnishings, or other personal property not an integral structural fixture
- The value of the homeowner's sweat equity to rehabilitate their own property
- Mortgage guarantees
- Provision of on-going income payments
- Purchase of construction equipment

METHOD OF DISTRIBUTION

Competitive Model

The State may select an eligible nonprofit or nongovernmental organization, as a subrecipient, to act as an administering entity of the Local Recovery Housing Competition. This administering entity may support individual subrecipients, and/or a consortium of subrecipients, as described in the program guidelines.

PROGRAM OBJECTIVE & DESCRIPTION

In order to maximize the funding opportunities for housing recovery located outside of Mobile and Baldwin Counties not served by ADECA-implemented Home Recovery Alabama Program, the State of Alabama will implement a \$30 million-dollar competitive program to fund high-impact housing projects. Selected projects will maximize benefits to the community by providing funding for needed affordable housing projects, reducing area blight through housing redevelopment, preventing low-income individuals and families from experiencing homelessness, elevation and other mitigative measures. Other activities deemed necessary by local governments to meet the housing needs identified in the unmet needs assessment may also be eligible for funding under the housing competition.

Eligible applicants will be invited to submit applications for priority projects upon approval of their LRP. Submissions will be evaluated on several criteria including, but limited to, project beneficiaries, readiness, cost-benefit, mitigative aspects, service area demographics, and leveraging of other funding, among others as described in the program guidelines and grant application. A competitive process will ensure that implemented projects have high impacts and maximize the effects of the limited amount of CDBG-DR funding.

In order to enhance program participation and the geographic reach of these recovery funds, the Program may limit project/program submissions per applicant (whether applying individually or in partnership with another entity). This approach may increase the spread of CDBG-DR funding across the eligible area. Prior to opening the competitive application window, ADECA may send an announcement through its mailing list describing the details of this program as well as an announcement on the Department's disaster recovery website.

Competition Overview

ADECA will accept project submissions during an open application period. Program eligibility criteria will be published in the program guidelines and grant application. In addition to eligibility threshold criteria, applications may be evaluated on, but are not limited to, the following criteria:

- Meeting of a HUD national objective
- Benefits to low-to-moderate income persons
- Project beneficiaries, including vulnerable populations, protected classes, hard-to-reach populations
- Social vulnerability index (SoVI) score
- Serving an underserved community (defined as areas that were designated as a Promise Zone, Opportunity Zone, a Neighborhood Revitalization Strategy Area, a tribal area, or those areas that meet at least one of the distress criteria established for the designation of an investment area of Community Development Financial Institution at 12 CFR 1805.201(b)(3)(ii)(D).
- Serving an area that was economically distressed prior to the disasters
- Proximity to underserved areas
- Leveraging of other funding sources (I.e., providing the local FEMA match)
- Project readiness
- Demonstration of operations and maintenance feasibility

The scoring criteria will be included in the program guidelines and notice of funding availability advertised to the eligible areas. Supplemental information, data, analyses, documentation, commitments, assurances, etc. may be required or requested by ADECA for purposes of evaluating, rating, and selecting projects under this program.

AFFORDABILITY PERIOD AND AFFORDABLE RENTS

If eligible activities result in the new construction of affordable rental housing of five or more units, CDBG-DR assisted units must be rented to low- and moderate-income households with incomes that do not exceed 80% area median income.

Additionally, ADECA defines affordable rent not to exceed the lesser of either the High HOME Rents for the area and unit size or rent that does not exceed 30 percent (30%) of the adjusted gross income of the household.

CDBG-DR assisted units must meet the affordability periods below:

The enforcement of these affordability requirements will be through the registration of restrictive covenants, or other similar legal mechanism recorded to the property for the affordability period.

ADVANCING LONG-TERM RESILIENCE

This competitive program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, underserved communities, and disaster impacts within Alabama's disaster-impacted counties from Hurricanes Sally and Zeta. Awarded projects will include those that mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. Those projects will be required to be designed in such a way to minimize obsolescence.

Meeting Mitigation Requirements

HUD defines mitigation as "*those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.*" This program seeks to increase the resilience and reduce the long-term risk of damage. Favorable evaluation will be given to projects that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Local Recovery and Resilience Competition

- Exceptions to the maximum award caps may be made on a case-by-case basis. These exceptions may include, but are not limited to additional funding necessary to comply with federal accessibility standards or reasonable accommodation for persons with disabilities. Any exceptions will be provided in accordance with the State's adopted exceptions policy.

- Activities carried out using Urgent Need as the National Objective will be required to provide detail as to what is the urgent need, why it is of specific urgency, and how the conditions pose a serious threat to the health and/or welfare of the community. Documentation will also require direct applicability to the unmet needs assessment, including urgency, type, scale, and location of the disaster-related impact.

HURRICANE IMPACT

Projects must either have a demonstrable tie-back to the impacts from Hurricanes Sally and/or Zeta and address an unmet need or implement projects that mitigate activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

ELIGIBLE ACTIVITIES

Eligible activities within this program may include but are not limited to the following: Section 105(a)(1), (a)(2), (a)(4), (a)(5), (a)(7), (a)(8), (a)(9), (a)(11), (a)(14), (a)(15), (a)(16), (a)(17), (a)(21) and (a)(22).

Activities within this program may include, but are not limited to:

- Flood control and drainage repair and improvements, including the construction or rehabilitation of storm water management system.
- Restoration and modernization of infrastructure (such as water and sewer facilities, streets, provision of generators, bridges, public facilities, etc.)
- Resilience and elevation measures for critical facilities
- Repairs and modernization of damaged buildings that are essential to the health, safety, and welfare of a community when repairs to these buildings constitutes an urgent need (this can include police stations, fire stations, parks and recreational centers, community and senior centers, hospitals, clinics, homeless shelters, schools and educational facilities, and other public properties, including properties serving as emergency shelters)
- Natural or green infrastructure
- Communications infrastructure
- Public facility improvements, including streetscapes, lighting, sidewalks, and other physical improvements to commercial areas
- Acquisition, demolition, site preparation or rehabilitation of commercial structures carried out by a unit of local government
- Façade improvements to private or public structures in commercial areas
- Assistance to small businesses for rehabilitation and physical improvements to their places of business to increase resilience and to mitigate against future disasters
- Assistance to small businesses via grants or loans
- Workforce training and development
- Public services.

ELIGIBILITY

Counties in HUD or State-Designated MID areas (excluding Mobile County or Baldwin County); Local governments, non-profits, or government agencies may work with their respective County to propose projects or programs.

INELIGIBLE ACTIVITIES

- CDBG–DR funds may not be used to enlarge a dam or levee beyond the original footprint of the structure that existed prior to the disaster event. CDBG–DR funds for levees and dams are required to:
 - Register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams;
 - Ensure that the structure is admitted in the USACE PL 84–99 Rehabilitation Program (Rehabilitation Assistance for Non-Federal Flood Control Projects);
 - Ensure the structure is accredited under the FEMA NFIP; and
 - Maintain file documentation demonstrating a risk assessment prior to funding the flood control structure and documentation that the investment includes risk reduction measures.
- Funds may not be used to assist a privately owned utility for any purpose. A private utility, also referred to as an investor-owned utility, is owned by private investors and is for-profit as opposed to being owned by a public trust or agency (e.g., a coop or municipally owned utility).
- Buildings and facilities used for the general conduct of government (e.g., city halls, courthouses, and emergency operation centers).
- Contributions to a USACE project in excess of \$250,000.
- Assisting entities that failed to meet the conditions of obtaining and maintaining flood insurance on prior Federally assisted programs.
- If the property is purchased using eminent domain, the ultimate use of that property may not benefit a particular private party and must be for public use.
- Additional ineligible uses will be indicated in the program’s policy and procedures.

METHOD OF DISTRIBUTION

Competition Model

The State may select an eligible nonprofit or nongovernmental organization, as a subrecipient, to act as an administering entity of the Local Recovery Housing Competition. This administering entity may support individual subrecipients, and/or a consortium of subrecipients, as described in the program guidelines.

PROGRAM OBJECTIVE & DESCRIPTION

To maximize the funding allocated to counties outside of Mobile and Baldwin that were most impacted by Hurricanes Sally and Zeta, ADECA will implement a \$22.2 million dollar competitive program to fund a wide range of high-impact infrastructure and economic revitalization activities that will maximize benefits to the community by preserving and improving critical infrastructure and public facilities, supporting the recovery of commercial areas, restoring commercial activity in those areas, and increasing resilience to future disasters.

Eligible applicants will be invited to submit applications for priority projects that will be evaluated on several criteria including, but not limited to, project beneficiaries, readiness, cost-benefit, mitigative aspects, service area demographics, and leveraging of other funding, among others. A competitive process will ensure that implemented projects have high impacts and maximize the effects of the limited amount of CDBG-DR funding.

To enhance program participation and the geographic reach of these recovery funds, the Program may limit project submissions per applicant (whether applying individually or in partnership with another entity). This approach may increase the spread of CDBG-DR funding across the eligible area.

Prior to opening the competitive application period, ADECA may send an announcement through its mailing list describing the details of this program as well as an announcement on the Department's disaster recovery website.

Competition Overview

ADECA will accept project applications during an open application period. Applications may be evaluated on, but are not limited to, the following factors:

- Meeting of a HUD national objective
- Benefits to low-to-moderate income persons
- Project beneficiaries
- Cost per person benefiting
- Project beneficiaries including vulnerable populations, protected classes, hard-to-reach populations
- Social vulnerability index (SoVI) score
- Serving an underserved community (defined as areas that were designated as a Promise Zone, Opportunity Zone, a Neighborhood Revitalization Strategy Area, a tribal area, or those areas that meet at least one of the distress criteria established for the designation of an investment area of Community Development Financial Institution at 12 CFR 1805.201(b)(3)(ii)(D).
- Serving an area that was economically distressed prior to the disasters
- Leveraging of other funding sources (i.e., providing the local FEMA match)
- Project readiness

This scoring criteria will be included in the notice of funding availability advertised to the eligible areas. Supplemental information, data, analyses, documentation, commitments, assurances, etc. may be required or requested by ADECA for purposes of evaluating, rating, and selecting applicants under this program.

ADVANCING LONG-TERM RESILIENCE

This competitive program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, underserved communities, and disaster impacts within Alabama's disaster-impacted counties from Hurricanes Sally and Zeta. Awarded projects will include those that mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. Those projects will be required to be designed in such a way to minimize obsolescence.

Addressing Disaster-Related Systems

As described in the Unmet Needs Assessment, there are infrastructure and economic revitalization needs resulting from Hurricanes Sally and Zeta that were not covered by FEMA PA or HMGP, SBA, or other state resources. Many of the infrastructure needs may be due to lack of funding or because of the limitations placed by FEMA on what can be replaced with Public Assistance funds.

These program funds will be used to build, replace, or improve damaged systems that will help protect life and property and can withstand future disasters and the impacts of climate change. Projects that do so to a greater effect will be evaluated more favorably during the competitive process.

ADECA will require subrecipients to identify and submit projects that address remaining unmet needs. ADECA will require awarded entities to employ adaptable and reliable technologies to guard against premature obsolescence and ensure that the construction or rehabilitation of infrastructure will mitigate future flood risk.

Meeting Mitigation Requirements

HUD defines mitigation as *"those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters."* This program seeks to increase the resilience and reduce the long-term risk of damage. Favorable evaluation will be given to projects that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

Operations and Maintenance

In the application for funding, applicants will be required to communicate how they intend to fund, with local dollars, the long-term operations and maintenance of the infrastructure projects. Applications that do not fulfill this requirement will not be considered for funding.

Housing Program

No Grantee Program(s)

Buyout Program

No Grantee Program(s)

Infrastructure Program

No Grantee Program(s)

Economic Revitalization Program

No Grantee Program(s)

Public Facilities Program

No Grantee Program(s)

Public Services Program

No Grantee Program(s)

Mitigation Program

No Grantee Program(s)

5. Appendix

Certifications.

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
- f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

- h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- i. The grantee certifies that it is complying with each of the following criteria:
 - 1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - 2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - 3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
 - 4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
 - b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee’s implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
- n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA’s most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

b. Waivers (if applicable).

c. Summary and Response of Public Comments. The following provides a summary of public comments received for the *CDBG- Disaster Recovery Action Plan* in response to Hurricanes Sally & Zeta during the public comment period of September 20, 2022 through October 20, 2022. Alabama received a total of 33 comments during the 30 calendar days.

Attachment of full public comment

| | <u>Date</u> | <u>Submitter</u> | <u>Question/Comment</u> | <u>Category</u> | <u>Draft Feedback</u> |
|--|-------------|------------------|-------------------------|-----------------|-----------------------|
| | | | | | |

| | | | | | |
|----|------|---------|---|-------------------------|---|
| 1. | 9/21 | Citizen | <p>Please allow for the commercial property owners to receive financial support and be considered among the group of recipients. I have read the list of identified recipients and the wording is vague and does not clearly mention commercial building owners as a potential recipient. The commercial properties were affected as well, and the cost associated with the damage of Sally and Zeta still plagues un-repaired buildings today.</p> | Program Design | <p>Assistance to commercial properties, such as façade improvements to private or public structures in commercial areas and assistance to small businesses for rehabilitation and physical improvements to their places of business to increase resilience and to mitigate against future disasters, may be eligible activities under the Local Recovery and Resilience Competition Program, and the Formula Distribution for Mobile and Baldwin counties, and the City of Mobile business owners.</p> |
| 2. | 9/21 | Citizen | <p>Please make the documents easily accessible to qualified applicants. Often those with more dire needs receive little to no assistance due to well-established business owners or people with close connections to politicians/government officials being the first to know and do not readily share the knowledge with others.</p> | Outreach, Accessibility | <p>ADECA will conduct multi-faceted outreach to ensure that the public is aware of important program developments and milestones.</p> <p>Program documents will be made available to citizens, citizen groups, public agencies, and other interested parties upon request and will also be available on the public website.</p> <p>The materials will also be made available in various formats and in Spanish, upon request, and shall be accessible to persons with disabilities and to persons of Limited English Proficiency.</p> |
| 3. | 9/21 | Citizen | <p>Please make the documents used by the public clear and user friendly.</p> <p>If possible, use local businesses as a base the qualified residential homeowners may have trained volunteers (colleges student or private school students in need of community service hours, sorority, or fraternity members etc.) assist those in need with completing the application process.</p> <p>I own and operate a coffee shop and I would volunteer my shop as a location residents may come for such service.</p> | Outreach, Accessibility | <p>ADECA acknowledges that program documents should be easily understandable and user-friendly.</p> <p>ADECA, its subrecipients, and procured service providers will collaborate on the best methods of outreach, engagement, and application intake. Appropriate accommodation will be provided for those who require assistance.</p> |

| | | | | | |
|----|------|---|---|--------------------------------------|---|
| 4. | 9/21 | Aletheia House, Birmingham – Non-Profit Organization | <p>We are a non-profit organization that would like to help renovate single family homes that can be used for rental housing. Is this an eligible activity under the HRAP program?</p> <p>Also, can you confirm the \$350,000 maximum award is per property and not per organization?</p> | Eligible Activity, Program Design | <p>One of the goals of the proposed HRAP program is to address unmet housing needs described in the Action Plan by repairing, rehabilitating, and reconstructing damaged owner- and renter-occupied single-family housing units.</p> <p>The Action Plan proposes a maximum award of \$350,000 per property. Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |
| 5. | 9/21 | Citizen | What are the requirements for the grants? | Program Eligibility | <p>In general, all CDBG grants must meet the following HUD requirements, 1) be an eligible activity, 2) meet a national objective, and 3) have a tie-back to the impact(s) of hurricane Sally and/or Zeta.</p> <p>Please refer to the Action Plan for general descriptions of the proposed recovery programs to be implemented. Forthcoming program guidelines will provide more details on eligibility and other requirements specific to each program.</p> |
| 6. | 9/24 | Citizen | <p>My mom and dad are both disabled. My dad is on oxygen and in hospice. My mom takes care of him 99.9 percent of the time. They also have custody of my nephew. Their home was severely damaged by Sally and Zeta. The home has now become what I would say is unsafe. But they are still living in it.</p> <p>The floors are caving in the home and have sunk a good foot or so in spots where the hurricane water got in the home. Also, the roof has a few leaks from the storm. They are very low income – only ssa [sic] – and it is not nothing when you look at both my nephew and my expense.</p> <p>Can you help them if they need something done? It is getting worse to where my mom or dad is going to get injured, or a fire, or something is falling apart. Thank you for your time.</p> | Program Eligibility | <p>The proposed Home Recovery Alabama Program (HRAP) in the state’s action plan is intended to aid residents of owner- and renter-occupied single-family housing that was damaged during one of the hurricanes—through the approval of activities such as repair, rehabilitation, and reconstruction of the housing units.</p> <p>The basic eligibility requirement for any housing recovery program will be the ability of the resident to prove that damage to a unit was caused by either Hurricane Sally or Zeta. Additional eligibility requirements will be detailed in the program guidelines, which will be posted to the website when available.</p> |

| | | | | | |
|----|------|-----------------------|--|---------------------|---|
| 7. | 9/26 | Mayor, City of Marion | <p>I hope all is well. I am sending this email because I have been informed of recovery funds for the City of Marion. The money stems from the damage accrued from Zeta in 2020. The funds are to be disbursed through the county government.</p> <p>I hope that this process can be waived, and funds sent directly to the City of Marion. The city completed its FEMA documents for recovery and repairs and is very familiar with the processes. Also, our county and city governments do not have the best relationship. If funds are sent through the county government, they may be held up because of politics, which is not good for community business.</p> | Allocation of Funds | <p>Municipalities and citizens in Perry County will be able to access the disaster funding via the following programs:</p> <ol style="list-style-type: none"> 1) The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis. 2) The Local Recovery Housing Competition, which will fund high-impact housing projects. 3) The Local Recovery and Resilience Competition, which will fund a wide range of high-impact infrastructure, economic revitalization, and mitigation activities. <p>As a state-identified MID area, Perry County will also potentially be eligible to receive Local Recovery Planning Program funding, which will allow for the development of local recovery plans that identify possible recovery and mitigation projects to implement in the MID area. Additional eligibility requirements will be detailed in the program guidelines, which will be posted to the website when available.</p> |
| 8. | 10/5 | Citizen | <p>I am disabled/retired individual who have worked and never allowed my disability to define me.</p> <p>I desperately need help in repairing my home and mitigating future storm/hurricane damages. My home has been remodeled to certain ADA guidelines to enable me to continue to live in my home, roof, windows, driveway and settling, caused by erosion, trees too close to house, sewer/septic system and other.</p> <p>There are many homes in my community still on septic systems after 30-50 years. Also, single head of household families in need of roof and other repairs.</p> | Program Design | <p>The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |

| | | | | | |
|-----|------|--|--|---------------------|---|
| 9. | 10/6 | Citizen | I applied for FEMA assistance from Zeta, Sally assistance and was denied. I was referred to SBA loan I could not afford a loan. I had roof, fence, land wash off from back ditch flooding, sink holes, damage from tree windows. | Program Eligibility | <p>Having been denied FEMA or SBA assistance does not preclude a homeowner from applying to the Home Recovery Alabama Program.</p> <p>The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |
| 10. | 10/6 | Prichard City Women Federated Club Origination | Request assistance due to roof damage, fence, siding, other tree damage to property | Program Eligibility | <p>If this request is made from the standpoint of a single-family homeowner, the Home Recovery Alabama Program is proposed to be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> <p>Assistance to commercial properties, such as façade improvements to private or public structures in commercial areas and assistance to small businesses for rehabilitation and physical improvements to their places of business to increase resilience and to mitigate against future disasters, are possible eligible activities under the Formula Distribution for Mobile County.</p> <p>The state encourages all eligible applicants to collaborate with Mobile County during the planning period that will follow execution of the state's subrecipient agreement with Mobile County.</p> |

| | | | | | |
|-----|------|---|--|---------------------|--|
| 11. | 10/6 | Citizen | Assistance with hurricane damage to property roof, fence, siding, heating | Program Eligibility | <p>The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |
| 12. | 10/7 | Legal Services Alabama – Private Sector | <p>Thank you for the informative Disaster Public Hearing held in Selma, Alabama, on October 6, 2022. Please provide information on how Legal Services Alabama can apply for funds to represent clients needing legal representation.</p> <p>Legal Services Alabama provides legal assistance to low-income residents in all 67 counties, and we address disasters through our centralized call center and disaster technology unit.</p> <p>We have a history of working with disasters and were part of the disaster team for Hurricane Katrina, the BP Oil Spill, and the tornadoes affecting Tuscaloosa. We have experience working with the federal disaster recovery center, where we place attorneys in these centers when a disaster occurs.</p> <p>Your clarity on how to proceed is appreciated.</p> | Program Eligibility | <p>Non-profit entities are encouraged to collaborate with county governments to access funding through:</p> <ol style="list-style-type: none"> 1) The Local Recovery Housing Competition, which will fund high-impact housing projects. 2) The Local Recovery and Resilience Competition, which will fund a wide range of high-impact infrastructure, economic revitalization, and mitigation activities. 3) The Local Recovery Planning Program, which will fund comprehensive recovery planning in impacted areas; or 4) Direct formula allocations to Mobile County, City of Mobile, or Baldwin County. |
| 13. | 10/9 | Citizen | I sent an email concerning my house. My home needs shingles and the foundation is moving because of Hurricane Zeta. | Program Eligibility | <p>The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |

| | | | | | |
|-----|------|--|--|------------------------------------|---|
| 14. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>The Baldwin County Commission lacks staff and administrative capacity to oversee a program of this size and ensure programmatic compliance by municipal subrecipients. We request that ADECA assume program oversight, project selection, and subrecipient responsibilities.</p> <p>While Baldwin County Commission supports provision of CDBG-DR funding (at current or higher amounts as may be determined), the County currently lacks administrative systems and personnel to provide oversight for \$43,361,686 in CDBG-DR grant funds, as proposed. Specifically, a subrecipient administered program is not viable for the Baldwin County Commission. Accordingly, we would advocate for a separate funding mechanism specific to Baldwin County that would allow the County to maintain its proposed formula allocation, while shifting project selection and subrecipient oversight to ADECA based on a competitive or formula-based selection methodology.</p> <p>Baldwin County Commission is not a U.S. Department of Housing and Urban Development (HUD) entitlement community (i.e., Urban County), with existing cooperation agreements or standard subrecipient policies and procedures in place, making it very difficult to manage multiple projects with various municipalities and/or non-profit organizations (as may be allowed through public services funding).</p> <p>Baldwin County has fourteen municipal governments (none of which exceed 30K in population), as compared to Mobile County which includes both a large urban city (i.e., City of Mobile) and ten smaller municipalities. Note both Mobile County and the City of Mobile are separate HUD entitlement communities, which only highlights the differences between Baldwin and Mobile counties relative to local capacity to administer CDBG-DR subrecipients.</p> <p>Baldwin County Commission has only two full time staff assigned to administration / coordination of County-wide grants. These staff are currently tasked with other projects, including: 1) U.S. Treasury Emergency Rental Assistance Program; 2) U.S. Treasury Coronavirus State & Local Fiscal Recovery Funds (a.k.a. ARPA Fiscal Recovery Funds); and 3) assisting various departments with making application and implementation of other grant programs. Accordingly, the ability of existing staff to administer/ oversee a large-scale CDBG-DR program (as a subrecipient to ADECA) is not feasible.</p> <p>While the County realizes that staffing can be augmented through direct hiring and/or contracting with a consultant, the State of Alabama has only limited CDBG Management Firms to assist with program implementation. Further, staff do not have the capacity to manage a local or national firm and hiring experienced staff would be challenging given that there are no plans to maintain these positions once the CDBG-DR program is closed out.</p> <p>Administration of potential housing related activities would require long term monitoring during the required period of affordability. This could vary in terms of the number of years (based on the activity); however, with current staff, it would be most challenging to oversee the various factors that will need to</p> | Action Plan, Subrecipient Capacity | <p>The concern regarding Baldwin County’s lack of administrative capacity—due to insufficient staffing and other factors—is a valid concern and one that is shared by many recipients of CDBG-DR funding.</p> <p>In most cases, other CDBG-DR subrecipients have alleviated this burden by procuring grant management services of a qualified administrative consultant to assist with the management and implementation of the federal grant. A firm that performs grant management services could provide supplemental staffing to assist the County with non-governmental functions as well as technical expertise in disaster recovery to support the county’s full-time administrative staff and potentially alleviate the County’s insufficient staffing issue.</p> <p>ADECA is available to assist the County with developing a Request for Proposals (RFP) and compliant procurement that would have the potential to generate interest from a large pool of qualified firms—located both inside and outside of Alabama—and will also be available as a resource for technical assistance throughout implementation of the grant. While we acknowledge that firms within the state may be limited, regional and national firms are likely to respond to such an RFP.</p> <p>One of the goals of the Local Recovery Planning Program is to provide funding resources for local governments to identify capacity needs and develop a strategy to address the needs identified. In this instance, the strategy could be to hire specific staff or to procure an outside firm to address staffing needs. Capacity planning is an eligible activity in addition to the planning being undertaken to identify possible recovery and mitigation projects. Additional information will be detailed in the</p> |
|-----|------|--|--|------------------------------------|---|

| | | | | |
|--|--|--|--|---|
| | | be reviewed annually (e.g., property and site conditions, continued occupancy, rent and utility levels, income levels, property and/or flood insurance, etc.). | | program guidelines, which will be posted to the website when available. |
|--|--|--|--|---|

| | | | | | |
|-----|------|--|--|----------------------------------|---|
| 15. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>We appreciate efforts to identify a fair and reasonable formula for allocation of funding; however, we would like to see additional funding provided for Baldwin County, as well as a different distribution method that alleviates subrecipient oversight for Baldwin County municipalities.</p> <p>Baldwin County (1,590 square miles) has the largest land area of any county in the State of Alabama and is 25.6% larger than Mobile County with 1,229 square miles (which includes the City of Mobile at 139.5 square miles). The complexities and added costs of constructing projects within the larger footprint only further complicates program implementation and oversight; however, there is no consideration for the differences between the geographic size of the State's Hardest Hit Most Impacted and Distressed Areas (MID's). Specifically, we would advocate for an allocation formula that also considers geographic size, as well as population, noting that less densely populated areas may involve projects that cover larger areas, making these more costly.</p> <p>The level of damage sustained in Baldwin County was commensurate with Mobile County; however, Mobile County and the City of Mobile (combined) are proposed to receive twice the allocation proposed for Baldwin County (see Table 55 on page 102). We would ask that the allocation formula be reevaluated to consider this factor as well.</p> <p>As noted above, shifting project selection and subrecipient administration / oversight to ADECA for Baldwin County Commission and its municipalities is the preferred distribution method.</p> | Action Plan, Allocation of Funds | <p>Regarding the County's request for a larger allocation of disaster recovery funds, please keep in mind that the state's total allocation from HUD (specified in the February and May 2022 allocation notices in the Federal Register) is less than the state's total amount of remaining identified unmet need. The allocated funds will be used to meet the greatest unmet needs as identified through the planning process but will be unable to meet the full unmet needs of the disaster-affected areas of the State.</p> <p>It is also important to note that the unmet needs assessment considers several factors in addition to the level of damage, including the availability of other sources of funds. Although the amount of damage Baldwin County experienced may be commensurate with what Mobile County experienced, the Unmet Needs Assessment revealed Baldwin County has had more of its need met through other funding sources, such as FEMA, the Small Business Administration (SBA), private insurance, etc. The direct allocation amounts the City of Mobile and Baldwin and Mobile counties will receive are proportional to the jurisdictions' remaining unmet need, as identified by the assessment.</p> <p>Baldwin County's status as Alabama's largest county geographically is not a factor that will lend it to receive a larger allocation. Geographic size is not a factor that has been used in HUD's methods for estimating unmet needs. HUD calculates unmet housing needs as the number of housing units with unmet needs times the estimated cost to repair those units less repair funds already provided by FEMA and SBA. Unmet infrastructure and economic revitalization needs are calculated using similar methodology. ADECA used data sources and methodologies that are consistent</p> |
|-----|------|--|--|----------------------------------|---|

| | | | | | |
|-----|------|--|--|--|--|
| | | | | | with HUD-approved precedent when developing the unmet needs assessment. |
| 16. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>HRAP provides a viable source of funding for single family owner renters and occupied properties in Baldwin County. The \$350,000 award limit should provide adequate funding for those properties requiring major rehabilitation, reconstruction, or even new construction, as may be required. Replacement of manufactured housing and inclusion of mitigation / resilience measures are also valuable features of this program, which can benefit our residents.</p> <p>Baldwin County Commission would like to see ADECA utilize a scoring/ranking system for provision of HRAP funding to ensure an equitable distribution of these funding based on location. Specifically, Baldwin County (i.e., one of two Hardest Hit MID areas) should receive HRAP funding equivalent to an amount not less than its percent of unmet housing needs.</p> <p>Baldwin County Commission looks forward to working with the ADECA to support outreach activities for HRAP.</p> | Action Plan, Allocation of Funds, Program Design | <p>The state equally looks forward to collaborating with Baldwin County to accomplish objectives of the Home Recovery Alabama Program (HRAP), as well as broader CDBG-DR and program objectives related to fair housing and equal opportunity and is appreciative of the County’s offer to support outreach activities related to the proposed housing program.</p> <p>The state has an obligation to affirmatively further fair housing with its CDBG-DR funds, which means taking meaningful actions to overcome patterns of segregation, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.</p> <p>When developing the program guidelines for the HRAP, the state will seek input from the hardest-hit most impacted and distressed (HHMID) areas, including Baldwin County, to ensure that the program provides for a fair and equitable distribution of funding, including supporting vulnerable populations and underserved communities, and advancing equity for protected class groups.</p> <p>ADECA will consider the County’s suggestion of using a ranking/scoring system when determining how to prioritize awarding program funding, including using geographic location as an eligibility criterion to ensure that recovery for Alabama residents in the HHMID areas is prioritized.</p> <p>The HRAP guidelines will be developed and finalized following HUD approval of the state’s action plan—which the state expects to receive around the end of January 2023.</p> |

| | | | | | |
|-----|------|--|---|--|--|
| 17. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>LRP (Local Planning Recovery Program) will provide financial assistance in support of much needed planning related to documentation of unmet needs, facilitation of community engagement / outreach, identification of programs and/or projects to address unmet needs and assessment / development of local capacity to inform a local recovery plan. We fully support funding for this program, noting that Baldwin County has unique challenges as compared to Mobile County / City of Mobile (which are classified along with Baldwin County as the Hardest Hit MID areas).</p> <p>We anticipate that the LRP will indicate a need to support eligible public service activities and would therefore request that consideration be given to providing a budgetary set-aside for Baldwin County Commission (\$250k to \$500k) to facilitate this.</p> <p>Table 50 on page 87 shows that the percentage of overall unmet needs for Baldwin County is 32%; however, the seven counties with <7% (combined) of overall unmet needs are proposed to receive the same amount of planning funding as Baldwin County. Distribution of planning funds should reflect and factor unmet needs into the proposed allocation.</p> <p>Given capacity issues also noted herein, Baldwin County Commission would ask that a higher dollar amount (\$1.75 million) be provided to Baldwin County as a Hardest Hit MID area, which is larger in geographic size and number of municipalities than Mobile County and lacks basic organizational and programmatic experience as afforded through the HUD entitlement program.</p> | Action Plan, Allocation of Funds, Program Design | <p>The current version of the state’s action plan specifies a \$10 million budget for the Local Recovery Planning (LRP) Program, with a \$1 million maximum award available to eligible entities—which include the nine HUD- and state-identified MID areas and the City of Mobile.</p> <p>The state expects that the potential \$1 million maximum award will be sufficient to meet each of the eligible subrecipient’s planning needs. If the maximum award is determined to be insufficient at a later date, the State may consider an increase to the maximum award amount if there is a reasonable justification and funding remains.</p> |
| 18. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>To further elaborate and clarify Action Plan data and text, we request that ADECA consider the following comments (with page numbers noted, as applicable):</p> <p>Hurricane Data (pages 1 - 8)</p> <p>Most of Baldwin County was without power, power outages were not limited to just Orange Beach and Gulf Shores. p.3</p> <p>The damages sustained by the Tropic Isles condominium in Gulf Shores (as shown on page 5) demonstrate the types of impacts that were experienced in Baldwin County; however, it is noteworthy that another mid-rise development (i.e., the <i>Plantation</i> on Fort Morgan) was also damaged. The damage to the <i>Plantation</i> displaced residents from two buildings (5 stories each with about 8 units per floor). p.4</p> <p>Baldwin County took a direct hit from the very slow-moving Hurricane Sally, with sustained high winds over a long period of time. Hurricane Zeta was a very fast-moving storm which hit Louisiana initially and then moved quickly through Mobile County. p.5</p> | Action Plan | <p>Note the state will edit the referenced sections in the action plan, as necessary, to correct any information that is not accurate in the current version of the action plan—prior to submitting the action plan to HUD.</p> |

| | | | | | |
|-----|------|--|--|-------------|--|
| 19. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>To further elaborate and clarify Action Plan data and text, we request that ADECA consider the following comments (with page numbers noted, as applicable):</p> <p>Housing Data (pages 12-36 and page 50)</p> <p>The impact of COVID was important and unique for Hurricanes Sally and Zeta. This is highlighted in the fourth bullet point on page 14; however, this context is critical to understanding the potential understatement of damages for both storms. p. 14</p> <p>Table 3 shows Baldwin County had higher levels of major-high and severe property loss values than the nine-county average. Severity of damage is an important indicator of impact levels. p. 18</p> <p>Table 4 shows that total occupied housing units are much lower for Baldwin County; however, this was due to the fact that rental units were impacted by both COVID and the threat of severe weather. p. 18</p> <p>Information provided at section 4.4 (paragraph 6) states that over half of total FEMA verified damage was in Mobile County and 29% in Baldwin County. While we understand that this information is based on FEMA IA verified loss for owner and tenant occupied properties (combined), we are concerned over the drastic difference between tenant applications as compared between Baldwin and Mobile counties. p. 22 & 23</p> <p>Please note that Table 6 shows Mobile County had twice as many FEMA verified inspections as Baldwin County, although there were roughly the same number of applications. We believe this was largely impacted by the fact that roads were less accessible due to more damage (downed power lines and trees) in Baldwin County. This factor alone would impact the amount of Total FEMA Verified Loss and subsequently impact the calculation of unmet needs to show less need in Baldwin County. p. 23</p> <p>Section 4.4.2 for FEMA IA Tenant Applications shows that Baldwin County had significantly less applicants than Mobile County; however, this could be related to condominiums being used for short term vacation rentals as opposed to year-round tenancy. This factor coupled with the lower percentage of inspections (due to inaccessible roads) may have negatively impacted tenant Total FEMA Verified Loss for Baldwin County. p. 23</p> <p>The renter-occupied vacancy rate for Baldwin County is shown as 46% (Table 20 on page 34), which is noted as being an outlier. We believe this number is not a true representation of actual vacancies within the County as a whole because this statistic has been skewed due to beach condominium rentals, which were negatively impacted by COVID. More specifically, as of the date of the 2020 Census (i.e., April 1, 2020), Alabama beaches were closed by proclamation of the Governor, which most certainly impacted the number of renters and artificially inflated vacancy rate information. p.28 and p.34</p> | Action Plan | <p>The state has noted the points the County made related to Total FEMA Verified Loss in Baldwin and Mobile counties identified in the draft action plan, including the higher number of FEMA-verified inspections that occurred in Mobile County—possibly at least partly due to the inaccessibility of damaged roads in Baldwin County. The County also mentioned that the fewer IA Tenant Applications FEMA received from Baldwin County could be a function of the condominium buildings in the County having been used for short-term vacation rentals, as opposed to year-round tenancy.</p> <p>The state incorporated an estimate of disaster survivors into the unmet needs formula by using the total number of occupied housing units and the percentage of SBA home loan applicants without an associated FEMA registrant ID. Please see Section 4.3.5 in the draft action plan for additional details related to the formula the state used to account for disaster survivors that did not apply to FEMA.</p> <p>Additionally, the letter mentioned that the Alabama governor’s COVID 19-related proclamation that closed Alabama beaches during a period in 2020 contributed to the higher percentage of renter-occupied vacancy rate the state identified for Baldwin County.</p> <p>The State is required by HUD to use the best available data when developing the action plan. In this case, the best and most consistent data the state can use in the population category in the method of distribution is to refer to the U.S. Census, which provides the most reliable information on the number of full-time residents who live in each of the affected counties. Using U.S. Census data allows the state to adopt the same approach across all MID areas when determining each county’s allocation.</p> |
|-----|------|--|--|-------------|--|

| | | | | | |
|-----|------|--|--|-------------|---|
| 20. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>To further elaborate and clarify Action Plan data and text, we request that ADECA consider the following comments (with page numbers noted, as applicable):</p> <p>Flood Damages (pages 25 - 28)</p> <p>Baldwin County renters (per Table 12) had significantly less applications than Mobile County renters; however, this could be impacted if Baldwin County renter applicants are grouped together under a single Homeowners and/or Condo Owners Association application. Applicability/ use of this information should be reevaluated depending upon how applications are counted. p.26</p> <p>Data at tables 4.5.4 and 4.5.5 reflect the highest number of owners and the highest level of both non-flood and flood-related unmet needs, which is an important consideration for impact assessment. p.27</p> | Action Plan | <p>The state can confirm that FEMA IA applications are only open to individuals in federally declared disaster areas. Homeowner associations and landlords are permitted to submit applications to the SBA, however. The state did use SBA data in the Unmet Needs Assessment to estimate impacts to homeowner associations and landlords. Please see section 4.3.6 of the draft application plan for additional details related to this estimate.</p> |
| 21. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter dated 10/4/22)</i></p> <p>To further elaborate and clarify Action Plan data and text, we request that ADECA consider the following comments (with page numbers noted, as applicable):</p> <p>Mitigation (pages 56 - 59)</p> <p>Section 4.15.1 indicates that only "scattered areas of Baldwin County" are in a high hurricane wind risk zone; however, it is our understanding that all of Baldwin County is in a high hurricane wind risk zone. p.57</p> | Action Plan | <p>Regarding the County's comments related to its location in a high hurricane wind risk zone, the state conducted a Risk Mitigation Needs Assessment to determine hazard risks per county using historical hazard data, coupled with population, social, and lifeline vulnerabilities.</p> <p>Using this formula, the majority of Baldwin County was assigned to a medium hurricane force wind risk category. The Risk Mitigation Needs Assessment will be included as an appendix to the final action plan.</p> |

| | | | | | |
|-----|------|--|--|-------------|--|
| 22. | 10/4 | Baldwin County Commission – Local Government | <p><i>(Excerpt from a submitted letter 10/4/22)</i></p> <p>To further elaborate and clarify Action Plan data and text, we request that ADECA consider the following comments (with page numbers noted, as applicable):</p> <p>Other Considerations / Economic & Tourism Impacts</p> <p>Baldwin County beaches attract a substantial number of tourists each year. According to the Current & future Needs Study - MRF Recycling (Gershman, Brickner & Bratton, Inc. July 9, 2022), the impact of tourism is equivalent to having an additional 95,890 full-time residents. The implications of these additional full-time residents are not reflected in Census data; however, the impacts to housing and the economy are significant factors that are not specifically highlighted in the draft AP. Given that population is part of the allocation formula, we would request consideration for these 95,890 additional full time equivalent persons in terms of the funding calculation.</p> <p>The following is an excerpt from Baldwin County Commission's First Appeal to FEMA on Private Property Debris Removal (PR# 175678 submitted 04/30/2021 and prepared by Baker, Donelson, Bearman, Caldwell, & Berkowitz, PC).</p> <p><i>Tourism is the County's largest business. In 2018, the State of Alabama received 27.7 million visitors, which contributed \$15.6 billion to the Alabama economy. In 2019, the State broke both of these records, attracting 28.7 million visitors and collecting \$16.8 billion in tourist spending. Specifically, Baldwin and Mobile County, which make up the Gulf Coast region, saw revenue from tourism spending rise to \$6.7 billion in 2019, up 8% from the \$6.2 billion seen in tourism spending in the area in 2018. Baldwin County itself exceeded the \$5 billion mark in travel-related spending in 2019. County officials estimate that over 54,000 workers are employed around the beach towns of Orange Beach (Ono Island) and Gulf Shores within the County, accounting for 26% of the tourism-related jobs in Alabama.</i></p> <p><i>However, the County's tourism industry took major hits during 2020. Hurricane Sally severely disrupted the County's tourism industry, which was already reeling as a result of the COVID-19 pandemic ...</i></p> <p>The highlighted portion above was footnoted with the following articles published via AL.COM on May 3, 2020 @ 8:00 a.m. It is noteworthy that Governor Ivey ordered beaches closed for 6 weeks prior to the publishing of the article, which is during the same time that Census information was being completed. The article speaks to the occupancy rates being below 10% at the beaches during this time, which further reinforces our confidence that vacancy rates were exaggeratedly high during the Census.</p> <p>John Sharp, Alabama Shatters Tourism Records in 2019, but 2020 Looks Bleak, AL.com (May 3, 2020), https://www.al.com/business/2020/05/alabama-shatters-tourism-records-in-2019-but-2020-looks-bleak.html</p> <p>Gulf Coast News Today.com, Another Top Year for Tourism on Alabama's Gulf Coast (May 11, 2020), https://gulfoastmedia.com/stories/another-top-year-for-tourism-on-alabamas-gulf-coast.92949</p> | Action Plan | <p>As mentioned in the <i>Housing Data</i> section above, the best data and most consistent approach the state can use in the population category in the method of distribution is to refer to the U.S. Census, which provides the most reliable information on the number of full-time residents who live in each of the affected counties.</p> <p>ADECA will reach out to Baldwin County to schedule a meeting to discuss the points the County raised in the letter and to offer the commissioners a chance to ask any follow-up questions regarding the draft action plan and the state's response to the County's concerns.</p> |
|-----|------|--|--|-------------|--|

| | | | | | |
|-----|-------|--|---|-------------|--|
| 23. | 10/16 | <p>Mayors of these 12 municipalities in Baldwin County submitted identical letters to support a letter sent by Baldwin County on 10/4/22:</p> <ul style="list-style-type: none"> · Bay Minette · Daphne · Elberta · Fairhope · Foley · Loxley · Magnolia Springs · Orange Beach · Robertsdale · Silverhill · Spanish Fort · Summerdale | <p>At the Baldwin County Mayors' Meeting held earlier today, County Commissioners and their staff made a presentation and reviewed highlights of the draft CDBG-DR Action Plan, as well as the County's comment letter. Considering the information presented and corresponding discussion regarding this program, we would like to express our full support of the Baldwin County Commission's CDBG-DR Action Plan comment letter dated October 4, 2022.</p> <p>Specifically, we agree that ADECA should assume program oversight, project selection, and subrecipient responsibilities for this program rather than placing responsibility on the County Commission. We also support maintaining the current level of funding, with re-evaluation of the proposed funding formula and allocation methodology to determine if additional CDBG-DR dollars can be awarded to Baldwin County to address unmet needs and mitigation projects.</p> <p>Please feel free to contact me should ADECA staff wish to discuss this further.</p> | Action Plan | <p>The state has noted the 12 letters mayors whose jurisdictions are in Baldwin County submitted in support of Baldwin County's 10/4/22 action plan review letter and has provided a written response to the County's letter, which is included in comment #s 14-22 in this table.</p> |
|-----|-------|--|---|-------------|--|

| | | | | | |
|-----|-------|-------------------------|---|---------------------|--|
| 24. | 10/16 | Mayor, City of Prichard | <p>The City of Prichard wishes to address applications and requests for funding that have been submitted by The City but have not achieved equal opportunity in funding being allocated equitably with these requests. Prichard is a city in Mobile County, Alabama, United States. Prichard is the second largest city in Mobile County. As of the 2010 census, the population of the city is 22,659 at the time of impact. It is a part of the Mobile metropolitan area. Prichard borders the north side of Mobile, as well as the Mobile suburbs of Chickasaw, Saraland, Semmes, and the unincorporated sections of Eight Mile. Our data and statistical ratio have been included with surrounding counties.</p> <p>We are now again being shortfall of receiving the city's equal share of funding. For example, BP allocated over \$2 billion to the State of Alabama region, the city was due some assistance and we did not receive any funding from BP resources. Note, cities far north, not directly impacted, received funds.</p> <p>Secondly, we did not receive full benefits of ARPA funds (allocated over \$80 million dollars), that we perceived to be fair based on population and revenue as a non-essential unit (NEU). We are appreciative of the funding we have received, but we should not have to compete with other surrounding areas with limited resources to sustain long and short-term needs. We are striving to meet the essential needs of our citizens and developing projects that will increase revenue in and around The City of Prichard, Alabama.</p> <p>Today, we are faced with \$500 million dollars as it relates to the impact of Hurricanes, Sally, and Zeta, both destructive, that made landfall in the state of Alabama. We have short and long-term issues with water and sewer, infrastructure, and economic development. In looking at this opportunity set before us, it again appears to be non-equitable, because our population numbers and geographical layout of both the city of Mobile and the City of Prichard overlap, and now we are faced with dividing fund between ourselves and two other counties as we are the most underserved. <i>"We are asking if there is a more equitable way of evaluating and directing funding to the City of Prichard."</i></p> | Allocation of Funds | <p>Since Prichard is located within heavily impacted Mobile County—the MID area the state determined has the greatest remaining unmet need among all Alabama counties—Prichard has the benefit of having access to Mobile County's direct allocation of \$28.2 million, which will fund unmet housing, infrastructure, economic revitalization, and mitigation needs within the County.</p> <p>Both before and during the planning phase that will follow execution of the state's subrecipient agreement with Mobile County, the City should engage in ongoing collaboration with the County to make known the City's pressing recovery needs.</p> <p>The state has an obligation to prioritize the recovery of vulnerable populations and underserved communities where there has been a history of disinvestment of resources, and will require direct allocation recipients, such as Mobile County, to submit a local recovery plan to the state that is developed following consultation with local governments and other eligible entities that have a stake in the County's long-term recovery.</p> |
|-----|-------|-------------------------|---|---------------------|--|

| | | | | | |
|-----|-------|---|---|---|--|
| 25. | 10/17 | Washington County – Local Government | <p>Please find attached the suggested action plan for Washington County, Alabama. While it was not a county designated as a major disaster area, FEMA did designate it. The southern and southwestern portions of the county were the most devastated and this is the area that this plan addresses.</p> <p>Please look at the attached plan and please feel free to contact me if you have questions. I may be reached via email or cell phone at</p> <p><i>(Summary of a larger document, on file with ADECA)</i></p> <p><i>Washington County submitted a document entitled “Suggested Action Plan & Funding Justification” where they requested an allocation of approximately \$3.5 million dollars to implement the following programs:</i></p> <ul style="list-style-type: none"> · <i>Build Up! Single-Family</i> · <i>Build Up! Multifamily</i> · <i>Business Loan and Grant</i> · <i>Business PREP</i> · <i>Debris Removal/Clearance</i> · <i>Interim Assistance (via South Washington Economic Roundtable)</i> · <i>Infrastructure</i> · <i>Resiliency Property Purchase Program (via Alabama Province CHDO & Southern Province Developments, LLC)</i> · <i>Planning & Administration</i> · <i>Planning</i> · <i>Administration</i> | Allocation of Funds, Program Design | <p>As a state-identified MID area, the draft action plan identifies Washington County as an eligible entity to receive funding from the proposed Local Recovery Planning (LRP) program.</p> <p>Following HUD approval of the state’s action plan, the state will draft guidelines that will detail LRP program requirements and specify the criteria that should be included in each applicant’s local recovery plan. Washington County is encouraged to participated in the LRP Program and to submit to the state a local recovery plan that meets the criteria specified in the program guidelines.</p> <p>In addition to the LRP program, disaster-affected residents and eligible entities in Washington County will be eligible to apply to the state’s proposed Home Recovery Alabama Program (HRAP), and be eligible to compete for funding for infrastructure, economic development, and mitigation activities via the proposed Local Recovery and Resilience Competitive program, and for housing activities via the Local Recovery Housing Competition.</p> |
|-----|-------|---|---|---|--|

| | | | | | |
|-----|-------|---------|--|---------------------|---|
| 26. | 10/18 | Citizen | <p>I am writing to comment on the draft Hurricane Sally Action Plan.</p> <p>The Hurricane Sally funding is targeted in part to develop new quality storm resistant housing that will be available to the most vulnerable residents in these target counties. However, the funding set aside for such projects is insufficient to meet the need and should be increased. Allocating the funding based on FEMA claims or other metrics may not reflect either the need for new storm-resistant multifamily housing the target counties nor likely reflect the actual damage to this housing from Hurricane Sally. All such damage was clearly not reported. Moreover, development costs for storm resistant housing have risen dramatically in the last 24 months. It is well known that construction costs have gone up by approximately 50 percent. Interest rates have dramatically increased and in many coastal counties property insurance has risen dramatically as well both of which can reduce project mortgage amounts by millions of dollars. If sufficient funding is not available to make projects feasible, then few projects of any scale will be developed. And small projects are often unfeasible given compliance costs.</p> <p>Accordingly, the funding currently set aside for non-single family housing development should be at least doubled in order to create sufficient funds to make projects feasible. This is particularly true in those counties covered by the MID Competitive allocation process. Similarly, a presumptive cap of \$5,000,000 per project in these competitive counties is insufficient in light of current development costs.</p> <p>In at least those counties that will be competing for allocations, both municipalities and public housing authorities should be allowed to apply directly for funding from ADECA if the applicant can demonstrate in its application that it has a verifiable plan to ensure compliance with HUD rules.</p> | Allocation of Funds | <p>The design of the state’s action plan, including the recovery programs and award caps that are proposed to be implemented, must be kept within the parameters that the \$501 million allocation from HUD allows. Note the \$501 million allocation is hundreds of millions of dollars short of the unmet need the state calculated remains more than two years after the disasters.</p> <p>This means that the state’s long-term recovery cannot be fully met through this initial allocation of CDBG-DR funds alone. For this reason, the state encourages leveraging other funding sources to achieve the high-dollar developments that will assist the MID area in its recovery. If the state determines that the \$5 million award cap for the competitive programs is too low, it could later increase the cap via a substantial amendment to the action plan.</p> <p>Through outreach and engagement activities, the state determined that a single-family housing program represented the greatest need in the MID areas. Multi-family housing activities are also eligible through the direct allocations the state will make to three jurisdictions and through the proposed Local Recovery Housing Competition program.</p> <p>Public housing authorities are encouraged to collaborate with their respective county to propose recovery or mitigation projects.</p> <p>Prior to the state’s disbursement of any funding through the Local Recovery Housing Competition program and following a period of outreach and engagement with local governments, non-profit organizations, and government agencies, the eligible counties will be required to submit to the state a local recovery plan that identifies programs and projects to implement.</p> |
|-----|-------|---------|--|---------------------|---|

| | | | | | |
|-----|-------|---|--|---------------------|---|
| 27. | 10/18 | Citizen | <p>Still in need of repairs</p> <p>Roof damage: downstairs bedroom water leak in ceiling, downstairs bathroom water leak, upstairs bedroom water leak and damage, downstairs dining area water leak, French doors were blown open and destroyed by Zeta (caulked the door so it can stay secured until repaired; kitchen ceiling is buckling. Other damage in outside room.</p> <p>Recently repaired</p> <p>Water protruded down the bedroom walls from roof (just recently repaired the walls), water leak from roof destroyed bedroom floor and I just got it reinstalled, has bucket in room to catch future leaks to keep water from destroying floor again.</p> <p>Thanks for any support that you can provide.</p> | Program Eligibility | <p>The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |
| 28. | 10/19 | City Councilman, Fairhope – Government Official | <p>Fairhope has some of the highest housing costs in Alabama due to high land costs and coastal factors such as high property insurance and stronger building codes. This is on top of the large increase in construction costs.</p> <p>In recent years, Baldwin County has experienced dramatic population growth but has not seen a corresponding increase in affordable/workforce housing. Fairhope in particular needs new, high-quality storm-resistant housing.</p> <p>Hurricane Sally disaster funding appears to be designed to address these needs in Fairhope. The proposed funding of \$19,219,000 for Baldwin County is plainly insufficient given the extraordinary housing costs in the county and in Fairhope in particular. As a result, the funding available for new multifamily housing in Baldwin County should at least be doubled in amount to have any substantial impact in meeting the needs of the county.</p> | Allocation of Funds | <p>The current version of the action plan proposes a direct allocation of \$43,361,686 to assist Baldwin County in its long-term recovery from hurricanes Sally and Zeta. Following a planning period that includes consultation with community stakeholders, Baldwin County will be required to develop a local recovery plan that identifies the type(s) of programs and projects the County proposes to fund with its allocation.</p> <p>CDBG-eligible housing (including multi-family activities), infrastructure, economic development, and mitigation activities will constitute eligible uses of the funds. The County can prioritize the recovery and mitigation projects it deems most responsive to unmet needs —provided the plan complies with CDBG-DR program requirements and federal objectives related to advancing equity.</p> |

| | | | | | |
|-----|-------|---|--|-------------------------------------|--|
| 29. | 10/20 | Ecumenical Ministries Executive Director – Community Stakeholder | <p>Fairhope has some of the highest housing costs in Alabama due to high land costs and coastal factors such as high property insurance and stronger building codes. This is on top of the large increase in construction costs.</p> <p>In recent years, Baldwin County has experienced dramatic population growth but has not seen a corresponding increase in affordable/workforce housing. Fairhope in particular needs new, high-quality storm-resistant housing.</p> <p>Hurricane Sally disaster funding appears to be designed to address these needs in Fairhope. The proposed funding of \$19,219,000 for Baldwin County is plainly insufficient given the extraordinary housing costs in the county and in Fairhope in particular. As a result, the funding available for new multifamily housing in Baldwin County should at least be doubled in amount to have any substantial impact in meeting the needs of the county.</p> | Allocation of Funds | <p>The current version of the action plan proposes a direct allocation of \$43,361,686 to assist Baldwin County in its long-term recovery from hurricanes Sally and Zeta. Following a planning period that includes consultation with community stakeholders, Baldwin County will be required to develop a local recovery plan that identifies the type(s) of programs and projects the County proposes to fund with its allocation.</p> <p>CDBG-eligible housing (including multi-family activities), infrastructure, economic development, and mitigation activities will constitute eligible uses of the funds. The County can prioritize the recovery and mitigation projects it deems most responsive to unmet needs—provided the plan complies with CDBG-DR program requirements and federal objectives related to advancing equity.</p> |
| 30. | 10/20 | County Administrator, Escambia County – Local Government | <p>Thank you for this opportunity to submit comments regarding ADECA's Draft Action Plan for CDBG-Disaster Recovery for Hurricanes Sally and Zeta.</p> <p>The unmet needs assessment on page 87 of the plan indicates an unmet infrastructure need of \$347,066 for Escambia County. This amount would be wholly inadequate to address unmet infrastructure needs for mitigation purposes in Escambia County.</p> <p>Additionally, it is my understanding from individuals that attended the public hearing in Selma, that ADECA has announced that municipalities will have to apply for projects/funding through their county commissions. This was not discussed at the listening session in Mobile on August 10. This process has not been communicated to or discussed with the county commissions and/or their administrative staff.</p> <p>Escambia County and I believe, the other six rural counties, have relatively small finance and accounting staffs and would be hard pressed to administer these projects for the county and municipalities. This option may work fine in Baldwin and Mobile Counties but would be quite a burden for the other counties. Thank you for the consideration of these comments.</p> | Allocation of Funds, Program Design | <p>Citizens of Escambia County are eligible to apply directly to the Home Recovery Alabama Program (HRAP). Escambia County is an eligible entity to receive funding through the Local Recovery Planning (LRP) program, the Local Recovery Housing Competition, and the Local Recovery and Resilience Competition. The competitive programs will encourage collaboration between county administrations and local entities to put forth project applications.</p> <p>The action plan provides additional details regarding the state's proposed recovery programs.</p> <p>The State will provide capacity building training to aid counties in participating in CDBG-DR recovery efforts.</p> |

| | | | | | |
|-----|-------|---|---|------------------------|---|
| 31. | 10/20 | Clarke County Commission – Local Government | <p>After reviewing the information provided in the state’s action plan for the CDBG-DR for Hurricanes Sally and Zeta, we would like to express our disappointment that Clarke County was placed in the competitive grant funds category. Clarke County deserves an allocation like Mobile and Baldwin counties. We understand the amount would be much less than the amount allocated to these counties, but nonetheless we deserve an allocation. The county, with the assistance of the regional planning commission, has the capacity to administer allocated funds.</p> <p>The county experienced heavy damage from Hurricane Zeta and all communities were affected. Clarke County has significant differences from the larger Mobile and Baldwin counties so comparisons cannot be realistically made using FEMA and SBA reported statistics. If anything, the need for additional resources to recover is greater in Clarke County. The county is classified as a persistent poverty county, meaning its poverty rate has been over twenty percent for the last three decades.</p> <p>We respectfully ask that you consider this information before a final decision is made on the allocation of funds.</p> | Allocation of Funds | <p>The state completed the Unmet Needs Assessment using the best and most recent data that was available. At this point, the proposed allocation amounts will not be revised upward or downward for any direct (or non-direct) recipients.</p> <p>Representing a HUD-identified MID area, Clarke County residents and eligible entities will be able to apply for multiple recovery programs the state has proposed in the action plan, including the Home Recovery Alabama Program (HRAP), the Local Recovery Planning (LRP) program, the Local Recovery Housing Competition, and the Local Recovery and Resilience Competition.</p> |
|-----|-------|---|---|------------------------|---|

| | | | | | |
|-----|-------|--|--|-------------------------------------|---|
| 32. | 10/20 | Invictus Development – Private Sector | <p>We appreciate the opportunity to comment on the Hurricane Sally Action Plan. Based upon our review of the Action Plan, we feel the funding set aside for residents in the target counties is inadequate to address the needs of the most vulnerable residents in these counties. The measures used to assess the cost or replacement, or repairs as it relates to multifamily housing do not accurately reflect the true magnitude of the damage or the extent of the need.</p> <p>Construction and development costs have risen sharply over the past two years. In addition, interest rates have increased over recent months making construction budgets much more difficult. A third factor affecting coastal as well as all other real estate properties is the greatly increased insurance rates. When combined, these three factors make financing development projects much more difficult and demand substantially more funding to make them feasible.</p> <p>A cap of \$5,000,000 per project for non-single-family projects in the counties that have competitive funding is not sufficient in the current development environment and should be doubled to be realistic.</p> <p>We request that in counties competing for allocations, both municipalities and public housing authorities should be allowed to apply directly for funding from ADECA, provided the applicant can demonstrate in its application that it has a verifiable plan to ensure compliance with HUD rules.</p> <p>Please contact the undersigned should you have any questions.</p> | Allocation of Funds, Program Design | <p>The design of the state’s action plan, including the recovery programs and award caps that are proposed to be implemented, must be kept within the parameters that the \$501 million allocation from HUD allows. Note the \$501 million allocation is hundreds of millions of dollars short of the unmet need the state calculated remains more than two years after the disasters.</p> <p>This means that the state’s long-term recovery cannot be fully met through this initial allocation of CDBG-DR funds alone. For this reason, as well as the point Invictus made regarding the increase in construction costs that occurred in the industry, the state encourages leveraging other funding sources to achieve the high-dollar developments that will assist the MID area in its recovery. If the state determines that the \$5 million award cap for the competitive programs is too low, it could later increase the cap via a substantial amendment to the action plan.</p> <p>Through outreach and engagement activities, the state determined that a single-family housing program represented the greatest need in the MID areas. Multi-family housing activities are also eligible through the direct allocations the state will make to three jurisdictions and through the proposed Local Recovery Housing Competition program.</p> <p>Public housing authorities are encouraged to collaborate with their respective county to propose programs or projects.</p> <p>Prior to the state’s disbursement of any funding through the Local Recovery Housing Competition program and following a period of outreach and engagement with local governments, non-profit organizations, and government agencies, the eligible counties will be required to submit to the state a local recovery plan that identifies programs and projects to implement.</p> |
|-----|-------|--|--|-------------------------------------|---|



| | | | | | |
|-----|-------|----------|--|---------------------|---|
| 33. | 10/19 | Citizens | <p>These are individuals who needed assistance in responding to the Public Hearings Survey, mostly Prichard, Mobile, and Wilcox Counties. I am an outreach coordinator for Ozanam Charitable Pharmacy and loves in Prichard (Eight Mile). I was present at the hearing held in Prichard on 13 September and am very familiar with Mobile, Baldwin, Washington, Escambia, Clarke, and Wilcox Counties. I was born and raised in Wilcox County and attended Pine Hill High School. It's always a pleasure to give back to my community.</p> <p>***The following is a summary of damage comments compiled by Ms. Stewart and submitted along with her public comment***</p> <ul style="list-style-type: none"> · Little Fletcher, Eight Mile: Roof, flooding, interior damage, windows, doors, exterior siding, foundation, erosion, trees · Diana Shakelford, Mobile: Roof windows, doors, interior, furniture, foundation, erosion, driveway · Edward James, Eight Mile: Roof damage, leaking, trees need cut down- risk of falling on home, windows, painting, sewer/septic, driveway · Debrit Hudson, Prichard: Roof, loft damage, floors damaged from water, foundation · Jackie McCants, Eight Mile: Roof damage, water leaking, windows, shutters, felled trees · Dorothy Winfield, Eight Mile: Roof damage, interior ceiling damage, windows need replacing · Andrew Hawkins, Eight Mile: Damage to roof, windows, flooring · Arnold Kidd, Eight Mile: Roof damage, interior leaks, tree needs to be cut down · George Douglas, Eight Mile: Roof damage, replace deck top, fallen tree limbs, water well damaged · Rodrick Dungy, Eight Mile: Roof, leaks, sheet rock damage, walls, outside siding, fence damaged by falling tree · Georgia Lawrence, Eight Mile: Roof, Leaks, Etc. · Timothy Witherspoon, Eight Mile: Roof, interior leaks, ceilings, walls · Geraldine Jackson, Eight Mile: Roof damage, leaks, windows, doors, other · Janice Radcliff, Eight Mile: Roof, doors, shutters, windows · Alice Campbell, Mobile: Floors, roof · Palmer Nichols, Mobile: Erosion, need dirt, adjoining ditch needs attention, repair driveway · Kimberly Bates, Mobile: Roof, porch, interior, personal items · Kenneth Reese, Prichard: Roof, septic system, water damage in interior, erosion due to grading, foundation, windows, doors, etc. | Program Eligibility | <p>The Home Recovery Alabama Program will be administered directly by ADECA to repair, rehabilitate, and reconstruct existing owner- and renter-occupied single-family housing units. Citizens from all impacted counties may apply to that program on an individual basis.</p> <p>Further details on the HRAP will be published in Program Guidelines, which will be posted to the website when available.</p> |
|-----|-------|----------|--|---------------------|---|

- Albert Berteal, Mobile: Roof damage, ceiling, water entering two rooms and pulling ceilings down, doors, windows, foundation, etc.
- Vivian James, Orville: Wood frame house foundation settling, windows, doors, interior
- Billie Rae Poole, Mobile: Many damages, roof, interior leaks, doors, windows, foundation settling, etc.
- St. Louis Street Baptist Church, Mobile: provided list of church members stating individual home damage as well as church building damages
- Rev. Robert Stokes, Mobile: Roof damage
- Sarah Dixon, Eight Mile: Windows, doors, erosion, weatherization
- L.D. Portis, Lower Peach Tree: Roof and other leaks, etc.
- Veronica Portis, Lower Peach Tree: Roof damage, hail, mold, water heater damaged, leaking in bathroom and utility room, settling, shifting of doors and windows, water entering windows at air conditioning unit, food spoilage during power outage, plumbing under house and skirting
- Rita Carstarphen, Lower Peach Tree: Fence, storm shelter, shed top
- Sharon Stabler, Lower Peach Tree: Roof damage, water leaking inside, windows, doors, clothes, etc.
- William Pugh: Windows, doors, roof leaking, water damage interior
- Carrie Portis, Lower Peach Tree: Roof, porch, tents, interior leaking, water damage to interior, tree fell on roof, furniture damage, floor damage, clothing, carpentry work needed.
- Brian Kirkland, Lower Peach Tree: Roof damage, water leaks, windows, doors
- Santain Pugh, Lower Peach Tree: Uninhabitable trailer-willing to move if had means. Roof damage, leaking inside home, spots on ceilings, front door allowing water seepage, floors, electrical shortages, septic system, skirting, windows stuck, window unit leaking water, rotting wood, water lingering affecting stability of porch, erosion in yard, poor grading.
- Rosemary Blackmon, Thomasville: Roof, leaking in house, ceiling caved in, hardwood tile on floor, wind blowing water into front door, electrical issues caused by water. Willing to move if had means.
- Sabrina Patrick, Lower Peach Tree: Roof leaking over entire house, leaking over sink into sink drain, windows, doors settling. Willing to move.
- Brittany Jones, Thomasville: Roof damage, mildew in bathroom/bedroom. Willing to move if some place better.
- Janice Jones, Whatley: Roof
- Sandra Pugh, Lower Peach Tree: Roof damage, leaks into home, leaking underneath home, electrical blinking, doors, siding, food in freezer, windows

Hurricane Sally & Zeta Damage Assessment Survey

A total of 115 persons, including homeowners, renters, government employees, elected officials, and community stakeholders, responded to at least one question in the state's 20-question damage assessment survey the state emailed to Listening Session invitees. The number of responses the state received varied by question. Sixty-six of the 115 persons answered every question in the survey. A summary of the responses is below.

Survey Respondents Demographic Data

Around 63 percent of survey respondents identified themselves as homeowners, which was substantially greater than the percentage who identified as government employees (16.5 percent) among the choices the survey offered. In addition to those two groups, survey respondents also included those who identified themselves as community stakeholders (11.3 percent), as well as elected officials (7.8 percent), and renters (1.0 percent).

Nearly 82 percent of respondents indicated that they experienced one of the two hurricanes in Baldwin County. Around eight percent experienced one of the disasters in Mobile County, three percent in Escambia County, two percent in Clarke County and six percent experienced one of the hurricanes in another disaster-impacted county, including Conecuh, Dallas, Marengo, Washington, or Wilcox, each of which—except Conecuh County—is a HUD- or state-identified MID area.

English is the primary language of each of the survey respondents. No respondent identified a language other than English as a primary one.

Note the state's action plan lists the various organizations affiliated with the respondents who identified their organization in the survey.

Damage Assessment

Sixty-six persons responded to the survey question related to how they believed the hurricanes most impacted Alabama, with common answers including such things as damage to infrastructure (including utilities and municipal facilities), housing (including LMI housing), buildings, businesses, and personal property; flooding; wind damage; and downed trees and other debris restricting transportation.

Other responses included the loss of land and tourism revenue, power outages, and displacement of residents. Additionally, one respondent indicated that the state's agricultural industry was substantially impacted by the disasters. Disruption to income stream and increased personal expenses are two of the indirect financial impacts that resulted from the disasters.

Recovery Sectors

In terms of the recovery sector where survey respondents thought the state's disaster recovery funds would be best programed, infrastructure led the responses with around 58 percent identifying it as the top priority. Housing recovery was second with 35 percent, followed by Other at five percent, and Economic Development at three percent. The survey provided respondents the option to rank (1 – 4) the four sectors in terms of priority to them. Infrastructure led with the highest score of 3.48, followed by Housing (2.92) and Economic Development (2.27), with Other (1.32) ranking last.

Housing Recovery

The survey offered respondents a wide range of possible housing recovery programs to rank (1 – 9) based on preference to be implemented within their communities. Single-family owner-occupied housing (including reimbursement, reconstruction, and rehabilitation) garnered both the highest percentage of first-preference responses (50.0 percent) and the highest total combined score (7.92). Single-family rental housing (including reimbursement, reconstruction, and rehabilitation) had the second-highest combined score (6.03), followed closely by infrastructure directly supporting housing (5.95), voluntary buyout of impacted property (5.44), and multi-family rental housing (reconstruction/rehabilitation) (5.36).

Other housing programs the survey offered as options and how they ranked (combined score) in terms of preference include Multi-Family Housing with Low Income Housing Tax Credit (LIHTC) (4.65), Acquisition for Development of Affordable Housing (4.38), Mobile Home Optional Relocation or Replacement (3.67), and none of the above (1.59).

Other activities respondents offered separately as ones that should be considered for implementation include debris removal, single-family fixed income homes, low-income housing, transitional housing, senior housing, disabled housing, and workforce housing.

Infrastructure Recovery

The survey offered respondents seven choices, and none of the above, for possible infrastructure recovery programs that could be implemented and asked them to rank those (1 – 8) based on preference for implementation within their communities.

A stormwater program drew the highest percentage of first-preference responses (33.33 percent), as well as the highest total combined score (6.35). Generators for Critical Facilities and Roads and Bridges tied for second preference—both had a combined score of 5.76. Public Utilities had a combined score of 5.18, followed by Water Control Facilities (4.68), Treen Canopy/Re-planting (4.20), Parks and Recreational Facilities (2.91), with none of the above (1.17) last.

Other activities respondents offered separately as ones that should be considered for implementation include drainage improvements, acquisition/mitigation projects, elimination of septic tanks, and protection of the Magnolia River.

Economic Recovery

For possible Economic Development (ED) programs, the survey asked respondents the same question it asked regarding preference for various housing and infrastructure programs.

A Small Business Grant/Loan program garnered the highest percentage of first-preference responses (39.39 percent) and the highest combined score (4.82) among possible ED programs. Small Business Grant/Loan was followed closely by a possible Workforce Development/Job Training program (4.62). Technical Assistance was the third-most preferred type of ED program/activity (3.79), followed closely by industry-specific programs, such as those based in agriculture, fisheries, or tourism recovery (3.45). Some respondents indicated a preference for an ED program targeting assistance to other mid- to large-sized Alabama businesses (2.73).

Other activities respondents offered separately as ones that should be considered for implementation include additional services to the volunteer fire departments in Baldwin County, educational services, and social services program benefitting LMI persons.

Mitigation Activities

The survey offered respondents nine types of mitigation activities the funding could be directed toward. But instead of having the choices ranked 1-9, the survey offered respondents the option to select all activities where there was an interest.

Enhancing maintenance of vulnerable utilities (68.2 percent) was the activity that drew the highest percentage of responses, with enhancing the function of natural flood-mitigation features (63.6 percent) and strengthening emergency services (60.6 percent) close behind. Fortifying critical facilities (54.6 percent), replacing inadequate or vulnerable bridges and causeways (53.03 percent), and fortifying/hardening residential structures (50.0 percent) were also preferred by at least half of respondents.

Buyouts/acquisitions to remove people and property from hazard prone areas (34.9 percent), improving community awareness of hazard risks (25.8 percent), and developing or refining an evacuation plan (21.2 percent) are other mitigation activities for which respondents indicated an interest in programming the state's disaster recovery funds.

Public Services

One question in the survey offered respondents the opportunity to identify specific public services the state should consider for implementation. Seventy percent of respondents indicated that they did not prefer the state to implement a separate public services program. Among the 30 percent who indicated that a public/social services program should be considered, 20 individuals offered specific activities, many of which the state noted are not CDBG-eligible activities.

Among the responses were suggestions for pet shelters; emergency shelters for disaster-affected persons; a food bank; emergency aid (food and water); high-speed internet access in rural areas; restaurant vouchers to use when power outages exist; storm debris removal services; homelessness and elderly assistance; mental health services; coastal access for biking/walking trails and boating/fishing; a current radar and notification system for the area; upkeep of deceased persons, including storage and security; and SNAP benefits.

Hazard Mitigation Impediments

Sixty-six persons responded to the survey question pertaining to what is believed to be the biggest impediment to the implementation of hazard mitigation projects in the respondents' communities. Seventy percent of respondents indicated that funding is the biggest impediment. Capacity/staffing (13.6 percent), and legal impediments such as property rights and regulatory barriers (12.1 percent) lagged funding among the three options.

Three respondents offered an answer that was not included among the options. Those responses were: regulator indifference to dealing with pollution, overpopulation and development, and identification of the impediment as a multi-layered issue with no quick fix.

Unmet Needs Assessment

Seven of 66 respondents indicated that there are studies or data sets the state should use in the Unmet Needs Assessment. However, those respondents did not offer specific studies or data sets to use, and some of the responses that were offered did not address the survey question. One respondent suggested the state use the "past five years of population growth." Another respondent suggested the state use "past hurricane statistics" in the Unmet Needs Assessment.

Underserved Communities

The survey also asked respondents if they were aware of any residents or groups within their communities that may be considered 'hard to reach' or less likely to participate in public engagement activities, meaning that ADECA should reach out to them directly.

Seventy-seven percent indicated that they knew of no such hard-to-reach group, while 23 percent specified a population that warrants targeted outreach by the state.

Those residents and groups the respondents identified include: the elderly; widowed women; Keller Road residents; residents who do not live in Alabama year-round; persons lacking access to high-speed internet; residents who live outside incorporated areas; the undocumented immigrant population; persons with limited English proficiency; homeless and impoverished citizens; persons with special needs; and LMI persons.

e. Important Definitions and Terms.

- AMI: Area Median Income
- CBDO: Community Based Development Organization
- CDBG: Community Development Block Grant
- CDBG-DR:Community Development Block Grant- Disaster Recovery
- CFR: Code of Federal Regulations
- CO: Certifying Officer
- CP: Participation
- DOB: Duplication of Benefits
- DRGR: Disaster Recovery and Grant Reporting System
- FEMA: Federal Emergency Management Agency
- HCD Act: Housing and Community Development Act of 1974, as amended
- HHMID: Hardest Hit Most Impacted and Distressed
- HMGP: Hazard Mitigation Grant Program
- IA: (FEMA) Individual Assistance
- LIHTC: Low-Income Housing Tax Credit
- LMI: Low and moderate-income
- MID: Most Impacted and Distressed
- NFIP: National Flood Insurance Program
- PA: (FEMA) Public Assistance
- RE: Responsible Entity
- RFP: Request for Proposals
- SBA: U.S. Small Business Administration
- SFHA: Special Flood Hazard Area
- UGLG: Unit of general local government
- URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended
- USACE: U.S. Army Corps of Engineers

2021 CDBG-DR Form SF-424 Administrative Funds in Documents Tab

CDBG-DR Form SF-424 in Documents Tab
