ADECA
Alabama Department of Economic and Community Affairs

STATE OF *Alabama*

Action Plan for Disaster Recovery

2023

Tornadoes Plus Up Allocation

Change Log

Version (Date)	Summary of Changes Made
Version 1 (Month Day, Year)	Action Plan Approved by HUD.

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Executive Summary

Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Alabama will receive $7,719,000 in funding to support long-term recovery efforts following the *2023 Tornadoes* DR-4684 through the *Alabama Department of Economic and Community Affairs*. 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 in the HUD-identified Most Impacted and Distressed (MID) area of Dallas County, as well as the additional State-identified MID of Autauga County.

To meet disaster recovery needs, the appropriations act(s) 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 facilitate a quicker recovery. HUD has allocated *$7,719,000* in CDBG-DR funds to the *State of Alabama* in response to *2023 Tornadoes, DR-4684,* through the Allocation Announcement Notice published in the Federal Register at *Vol. 90, No. 95, May 19, 2025*[1] *(https://www.govinfo.gov/content/pkg/FR-2025-05-19/pdf/2025-08908.pdf).* This allocation was made available through the American Relief Act of 2025 (Public Law 118-158[2]).

Disaster-Specific Overview

On January 12, 2023, several supercell thunderstorms (DR-4684) spawned multiple tornadoes which caused significant damage in many areas of Alabama. The severe thunderstorms also produced damaging straight-line winds and hail up to golf ball size. The most severe damage from these tornadoes was in Autauga and Dallas Counties. The impacted areas experienced freezing temperatures following the disaster, making the situation worse due to the lack of electricity. These storms led to a presidential disaster declaration on January 15, 2023 and to the availability of Federal Emergency Management Agency (FEMA) Public Assistance (PA) and Individual Assistance (IA) in Dallas and Autauga Counties.

Most Impacted and Distressed Areas

As required by the Federal Register notice, Alabama will spend at least 80% of its allocation in the HUD identified MID area of Dallas County. Additionally, no less than 70% of the total allocation will be expended to benefit Low- to Moderate-Income persons. Proposed programs will include some disaster recovery related mitigation initiatives, as applicable, and may allow stand-alone mitigation activities to ensure that ADECA complies with the 15% mitigation expenditure requirement established by HUD for this allocation of CDBG-DR funds.

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[1] Federal Register, Vol. 90, No. 95, Monday, May 19, 2025 is publicly available at: https://www.govinfo.gov/content/pkg/FR-2025-05-19/pdf/2025-08908.pdf

[2] Full text of Public Law 118-158 is publicly available at: https://www.congress.gov/118/bills/hr10545/BILLS-118hr10545enr.pdf

HUD-identified MID Areas

Dallas County, Alabama

At 12:02 pm on January 12, 2023, a powerful high-end EF-2 tornado formed just outside the Town of Orville in Dallas County, Alabama, and moved quickly at 50 mph towards the southwest portion of the City of Selma with winds up to 130 mph. The tornado cut a wide path through Selma's historic downtown area, where homes were destroyed, brick buildings collapsed, oak trees were uprooted, cars were tossed onto their sides, and power lines were left dangling. Damaged areas included densely populated neighborhoods. The overall length and width of the damage had devastating impacts.

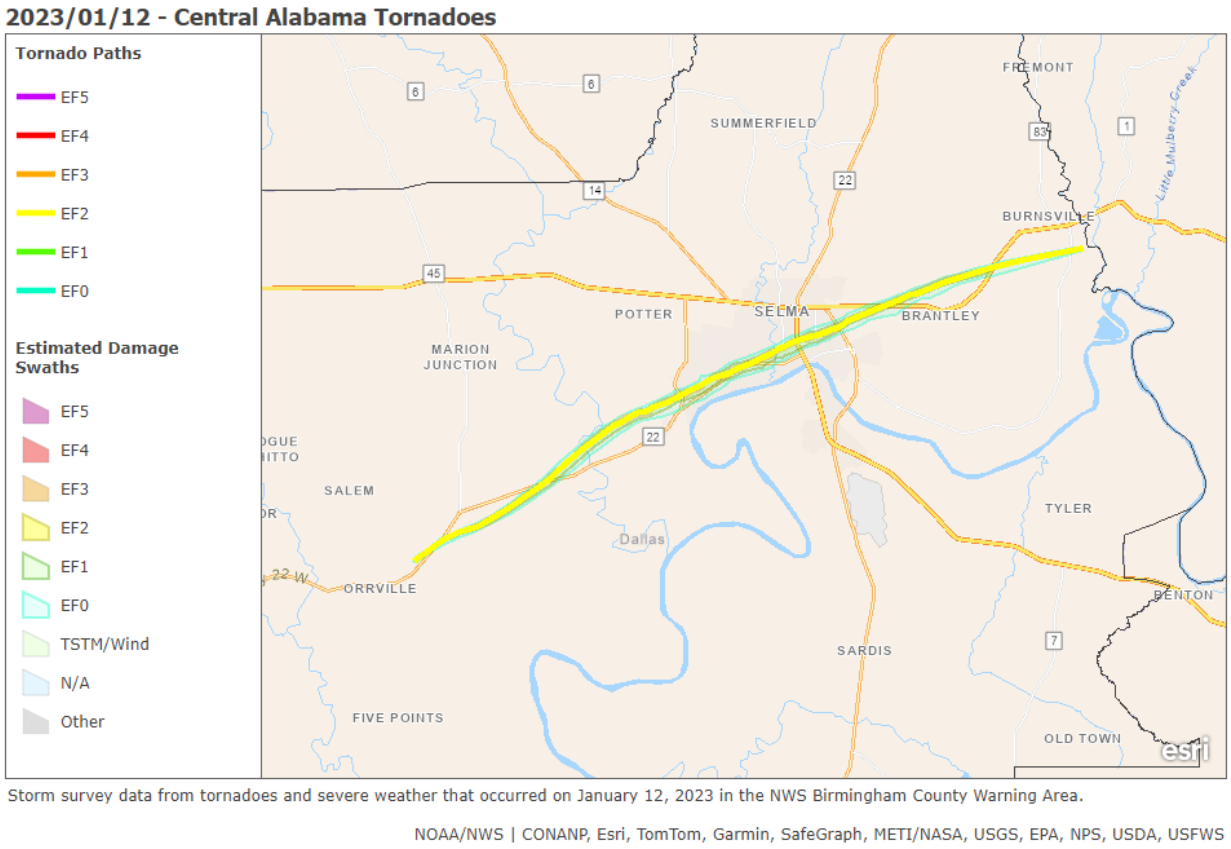


Figure 1: Map of the path and damage swath of the EF-2 tornado in Selma, Alabama on January 12, 2023, Courtesy of the National Weather Service.

Just outside the city limits of Selma, the tornado quickly intensified to an EF-2. Hardwood trees were uprooted and softwood trees were snapped, many landing on homes. The roof and exterior walls of a daycare on the southwest side of Selma were heavily damaged. Over 70 children and daycare workers took shelter in small interior rooms and bathrooms as portions of the roof collapsed into the classrooms and former sanctuary. Nearby, many of the buildings at the Selma Country Club sustained significant wind damage and elder trees were completely blown down.

Figure 2: A strip mall was heavily damaged in downtown Selma. (Image credit: NWS Birmingham, AL Damage Assessment[3])

Figure 3: Damaged historical homes in downtown Selma, January 12, 2023. (Image credit: NWS Birmingham, AL Damage Assessment[4])

[3] id

[4] id

As the EF-2 tornado exited downtown Selma, it caused additional structural damage to buildings, homes, and the Dallas County Jail, before it finally began to weaken and lift near the Brantley community.

Figure 4: Daycare on W Dallas Ave and Cooper Dr in Selma sustained heavy roof and exterior wall damage. (Image credit: NWS Birmingham, AL Damage Assessment[5])

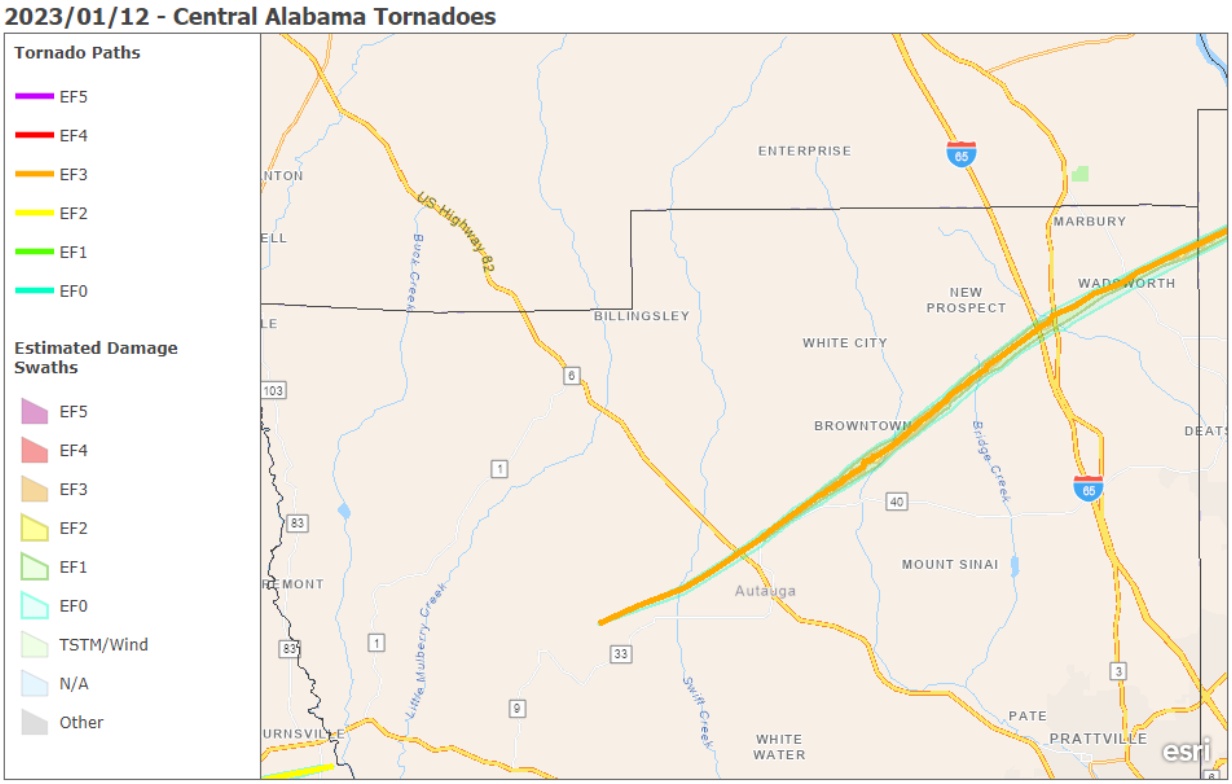
As the tornado continued further north and east, it entered the northern sections of downtown Selma. Many trees fell on historic homes, and some homes lost entire roofs; others still, completely collapsed. A strip mall in the heart of downtown Selma had much of its roof blown off, and some of the X-braces in a metal building system failed.

[5] https://www.weather.gov/bmx/event_01122023

Grantee-identified MID Areas

Autauga County, Alabama

At approximately 12:40 pm on January 12, 2023, a long-track tornado formed west of U.S. Highway 82 near Independence. Over the next two miles, it developed into an EF-3 tornado, resulting in 150 mph winds and causing catastrophic damage to the Old Kingston Community in Autauga County. Several mobile home communities were destroyed along a 3-mile path between County Road 43 and County Road 42. Vehicles were thrown up to 100 yards, creating impacting craters where they landed. Seven deaths were confirmed, 12 people were treated for injuries in hospitals, and approximately 40 homes were destroyed or seriously damaged.



Storm survey data from tornadoes and severe weather that occurred on January 12, 2023 in the NWS Birmingham County Warning Area.

NOAA/NWS | Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Figure 2: Map of the path and damage swath of the EF-3 tornado in Autauga County, Alabama on January 12, 2023, Courtesy of the National Weather Service

Figure 3: Mobile home completely destroyed with debris thrown more than 100 yards away (Image credit: NWS Birmingham, AL Damage Assessment[6])

Figure 4: Truck cab torn from bed in Autauga County during EF-3 tornado on January 12, 2023. (Image credit: NWS Birmingham, AL Damage Assessment[7])

In the residential community along Sandy Ridge Road, the tornado caused five deaths in three separate residences, with one home being thrown 250 yards into a field. The most severe damage

[6] id

[7] id

was seen along the path between County Road 43 to County Road 42, where wind speeds reached 150 mph. As the tornado continued along this path, it began to weaken a bit, but not before it caused significant damage to several single-family, site-built homes and numerous trees.

Figure 5: Brick house with walls and roof collapsed after EF-3 tornado tore through Autauga County, AL on January 12, 2023. (Image credit: NWS Birmingham, AL Damage Assessment[8])

The tornado weakened as it entered neighboring Elmore County and continued through three additional Alabama counties before dissipating in Chambers County. The total track of this tornado spanned more than 82 miles through five Alabama counties, with the most significant damage seen in Autauga County.

MID Low-to Moderate-Income Populations

In Dallas and Autauga Counties, the average median household income is $53,326, with an average per capita income of $30,298. The number of individuals below the poverty level in these counties is 17,023, representing 18.37% of the population. For context, the median household income for the

[8] id

State of Alabama is $62,027, with a per capita income of $34,835. Approximately 768,185 individuals (or 15.60%) have an income below the poverty level.

	Median Household Income	Per Capita Income	Number with Income Below Poverty Level (past 12 months)	Percent with Income Below Poverty Level (past 12 months)
Dallas	$36,810	$24,368	10,748	29.00%
Autauga	$69,841	$36,227	6,275	10.70%
Statewide	$62,027	$34,835	768,185	15.60%

Table 1: Household Income for MID Areas

For Dallas County (HUD-identified MID), the median household income is $36,810, with a notably lower per capita income of $24,368. The number of individuals below the poverty level is 10,748, or 29% of the population, indicating a considerably higher poverty rate compared to the state. Autauga County has a median household income of $69,841 and per capita income of $36,227, which is higher than the statewide median household income and per capita income. Although Autauga County fares better than Dallas County and the state as a whole, many of the most impacted areas of the county were in rural residential mobile home communities. Overall, these figures suggest that Dallas County and Autauga County have persisting economic vulnerabilities, particularly for those below the poverty threshold and those most impacted by the disaster.

	Total LMI Persons	Total Population for Which LMI is Calculated	Percentage LMI
State of Alabama	1,967,744	4,775,835	41.20%
Dallas County	19,590	37,625	52.07%
Autauga County	20,310	55,055	36.89%

Table 2: Low to Moderate Income Population

Low to Moderate Income (LMI) data shows that 43.05% of the MID area population qualifies as LMI, which is higher than the statewide (41.20%) average. This suggests that the MID areas of Dallas and Autauga Counties combined fare worse economically than the state as a whole and a sizable portion of the population still faces economic challenges, underscoring the need for targeted recovery efforts.

Overview of the Impacts of the Qualifying Disaster

The qualifying disasters, Alabama Severe Storms, Straight-line Winds, and Tornadoes (DR-4684-AL), caused widespread devastation in Dallas and Autauga Counties. On January 12, 2023, there were reports of at least 45 tornadoes according to preliminary data from the National Weather Service Storm Prediction Center.

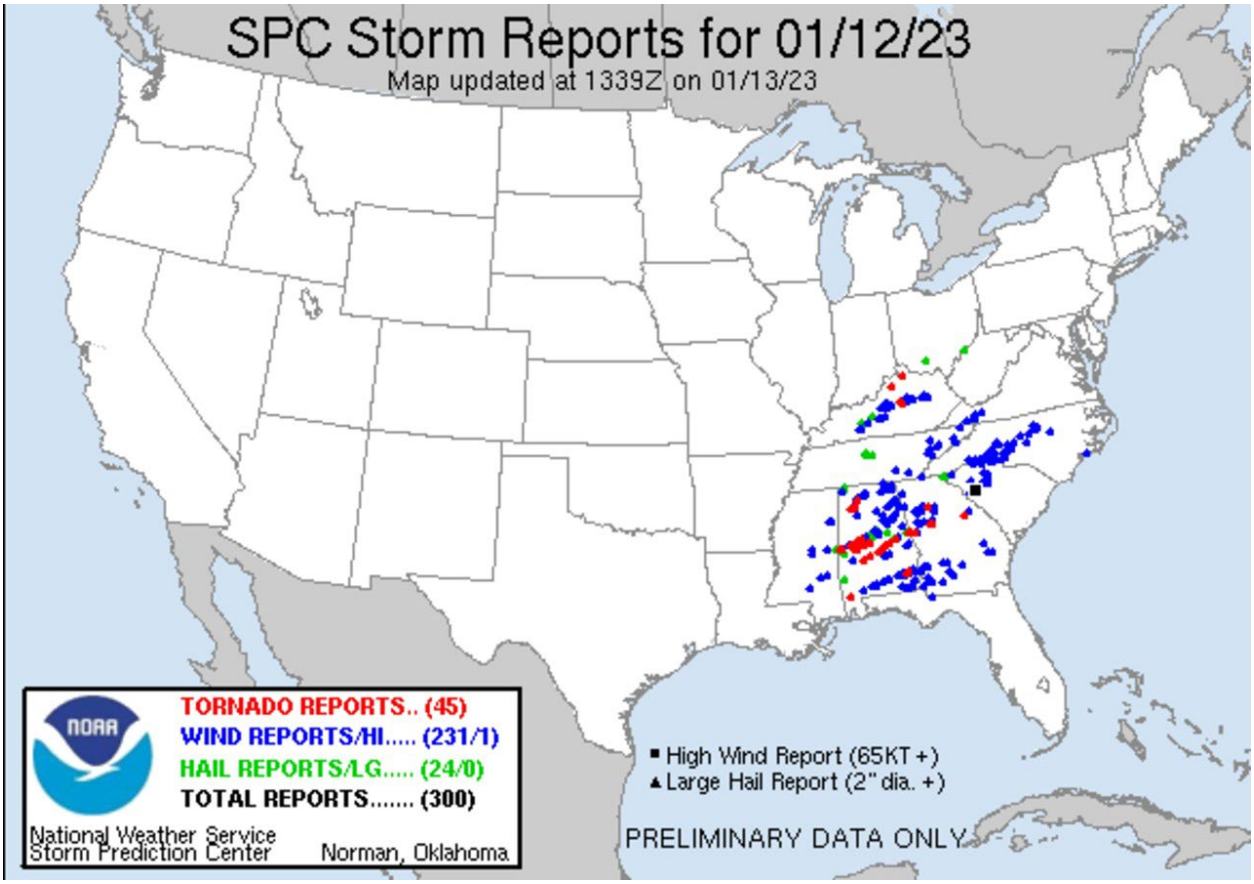


Figure 9: Storm Prediction Center storm reports for January 12, 2023, showing numerous tornado reports in Alabama. (Image credit: NWS Norman, Oklahoma Storm Prediction Center Preliminary Data[9])

The first tornado impacted densely populated residential areas in the City of Selma with high-end EF-2 damage to homes, businesses, and municipal buildings. The EF-2 tornado in Dallas County tore through downtown Selma and caused significant residential destruction, leaving a lasting impact on the community with the most pressing unmet needs currently focused on long-term housing repairs, particularly in the hardest-hit neighborhoods in the City of Selma.

[9] https://www.al.com/news/2023/01/how-many-tornadoes-hit-alabama-on-thursday-nws-to-continue-damage-surveys.html

Figure 10**:** Mangled steel beams and debris from the mobile home community of Old Kingston in Autauga County, AL. (Image credit: Jake Crandall, Montgomery Advertiser[10])

The second tornado touched down in Autauga County about an hour after the Selma tornado. The Autauga tornado caused catastrophic damage along its path, which was 1,500 yards wide at its widest. The community of Old Kingston, which is a residential neighborhood with mostly mobile and manufactured homes, was hit the hardest with winds of 150 miles per hour and complete destruction of most of the homes in the community. After devastating the Old Kingston community in unincorporated Autauga County, the tornado ripped apart homes and shredded trees in a residential area along Sandy Ridge Road.

[10] https://www.montgomeryadvertiser.com/story/news/local/progress/2024/01/11/one-year-later-deadly-autauga-county-tornado-reshaped-lives/72090041007/

Figure 11**:** Debris from homes lay near Sandy Ridge Road in Autauga County on January 19, 2023. (Image credit: Jake Crandall, Montgomery Advertiser.[11])

With an estimated $48.5 million in damages overall, Dallas and Autauga Counties sustained catastrophic damage, including homes that were heavily damaged or destroyed, numerous snapped and downed trees, with some trees on homes, vehicles that were moved or flipped, homes and businesses with compromised walls, complete obliteration of manufactured homes, and many homes rendered uninhabitable due to the degree of damage sustained.

Despite initial FEMA assistance, many residents still require substantial funding for reconstruction of their homes, or permanent repairs, including but not limited to roof replacements, foundation repairs, and electrical rewiring, particularly for low-income families who may not qualify or lack sustainable income for full coverage insurance.

Infrastructure systems were impacted by the 2023 tornadoes, but not significantly, and ample resources have been made available to assist with much of the impact. There was documented damage to roads and bridges, public buildings, and public utilities, but the FEMA Public Assistance (PA) Program has covered much of the infrastructure recovery in Dallas and Autauga Counties.

Businesses in Dallas and Autauga Counties were minimally impacted and much of the economic recovery was covered with existing funds or other recovery funding streams.

[11] id

Disaster Summary	
Qualifying Disaster:	DR-4684-AL
HUD-identified MID Areas:	Dallas County
Grantee-Identified MID Areas	Autauga County

Table 3: Disaster Overview

CDBG-DR Allocation Overview	
CDBG-DR Allocation:	$6,712,000
CDBG-DR Mitigation Set Aside:	$1,007,000
Total Allocation:	$7,719,000

Table 4: CDBG-DR Allocation Overview

Unmet Needs and Mitigation Needs Summary

The table below provides an overview of the $7,719,000 in CDBG-DR funding allocated to Alabama to support recovery from the 2023 Tornadoes. Because the state's unmet recovery needs exceed the available CDBG-DR resources, ADECA has prioritized use of funds to achieve the greatest impact in communities with the fewest resources to recover. All program activities will be carried out within Dallas and Autauga Counties, which is the HUD-designated and Grantee-identified Most Impacted and Distressed (MID) area.

As required by HUD, at least 70% of the funds will benefit low- and moderate-income (LMI) individuals and households. The priorities in this Action Plan reflect both the quantitative damage and unmet needs assessments and extensive input from residents, local organizations, and stakeholders.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
Administration	$ 385,950	5.0%			
Planning	$ -	0%	0%		
Housing	$7,333,050	95%	100%	80%	100%
Infrastructure (CDBG-DR Mitigation Set-aside)	$ -	0%	0%	0%	0%
Economic Revitalization	$ -	0%	0%	0%	0%
Public Services	$ -	0%	0%	0%	0%
TOTAL	**$7,719,000**	**100%**	**15%**	**80%**	**100%**

Table 5: Unmet Needs and Proposed Allocations

Unmet Need and Proposed Allocation

This Action Plan for Alabama ADECA 2023 Tornadoes details the allocation of all CDBG-DR funds, outlining eligibility requirements and how the funds will be used to support long-term recovery, rebuild infrastructure and housing, promote economic renewal, and mitigate future risks in the areas most affected and distressed. The Unmet Needs Assessment (UNA) is designed to explain the impact of qualifying disasters and highlight the most significant recovery needs that remain unresolved by insurance, federal aid, or other funding sources.

Drawing on data from FEMA, HUD, and additional sources, the UNA reviews recovery priorities in three main categories: housing, infrastructure, and the local economy (such as estimated job losses). It also considers ongoing challenges, like shortages of affordable housing, that have been worsened by the disaster. In accordance with federal guidelines, the housing needs analysis covers emergency shelters, temporary and permanent housing solutions, single-family and multifamily units for both renters and owners, public housing (including HUD-supported options), and other affordable housing types, ensuring that individuals who experienced homelessness prior to the disaster are included.

ADECA has identified over $29 million in remaining unmet disaster recovery needs resulting from impacts of the 2023 tornadoes. The table below provides the overall unmet need and disaster impacts of the 2023 tornadoes, by sector. To determine unmet needs, ADECA used a methodology described in further detail below in this section of the Action Plan.

Summary Impact, Support and Unmet Needs				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	$31,263,891	$13,708,736	$3,556,786	$48,529,412
Amount of Funds Available	$6,188,668	$11,544,183	$2,124,900	$19,857,751
Unmet Needs (Impact - Available Funds) + Resiliency Costs	$25,075,223	$2,164,552	$1,861,452	$29,101,226
Percent of Total Unmet Needs	86%	7%	6%	100%

Table 67: Estimated Impact, Support and Unmet Needs for IA Declared Counties

The 2023 Tornadoes produced an estimated $48.5 million in combined impacts across housing, infrastructure, and the local economy. Of this amount, approximately $19.9 million has been supported through available funds, leaving a significant unmet need of more than $29.1 million once resiliency costs and a 30% contingency are factored in.

Housing represents the most substantial area of need, accounting for $25.1 million or 86% of total unmet needs. This reflects the widespread damage to owner- and renter-occupied units documented in Dallas and Autauga Counties, as well as the limitations of available FEMA and SBA programs to fully cover losses. Infrastructure accounts for $2.16 million, or about 7% of unmet needs, as available funding has offset most—but not all—of the documented damage. Economic losses are estimated at $1.86 million, or 6% of total unmet needs, underscoring smaller but still meaningful impacts on local businesses and employment.

In summary, while the tornadoes created measurable effects across all sectors, unmet need is overwhelmingly concentrated in housing. Addressing these gaps is critical to stabilizing households, supporting community recovery, and ensuring that long-term resilience measures are integrated into rebuilding efforts.

Housing Unmet Need

Disaster Damage and Impacts

To provide insight into the pre-storm housing conditions in Alabama, ADECA reviewed its FY2025-2029 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.

According to the review of Alabama's FY2025-2029 Five-Year Consolidated Plan, ADECA determined that a large portion of households throughout the state require some form of housing support, with a notable concentration among those with the lowest incomes. Both homeowners and renters face varying degrees of housing cost burden. In 2023, Alabama had 2,360,135 housing units, of which 2 million were occupied—about 29.6% renter-occupied (592,043 units) and 70.4% owner-occupied (1,377,062 units). 25.4% of households were spending at least 30% of their income on housing costs. These data highlight that a significant segment of Alabama's residents are allocating a substantial share of their earnings to housing and thus have a critical need for more affordable options.

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. 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% were severely cost burdened.[12]

Prior to the severe thunderstorms and tornadoes in 2023, 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 30% of their area median income. According to the 2023 5-Year ACS Public Use Microdata Sample (PUMS), 173,399 renter households across Alabama are considered extremely low- income, with a shortage of 83,649 rental homes needed at that point in time. The maximum income reported in this sample was $30,220 annually for a 4-person family in Alabama. 70% of ELI 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.[13]

[12] https://adeca.alabama.gov/wp-content/uploads/2025-2029-Alabama-Five-Year-Consolidated-Plan.docx

[13] https://nlihc.org/housing-needs-by-state/alabama

Summary of Unmet Needs for Housing

FEMA, SBA, and insurance data show that housing losses from the January 2023 tornadoes totaled approximately $18.5 million, with the largest share attributed to owner-occupied units ($8.9 million) and SBA home loan verified losses ($8.86 million). Renter households experienced a smaller but notable share of losses ($707,000), while NFIP damages were negligible. No additional reported losses were identified for public housing.

Total Derived Impacts and Unmet Needs for Housing for MID Counties			
Data	**Applicants**	**Average Real Property Loss**	**Estimated Total Loss**
MID Owner-Occupied FEMA IA Verified Losses	2,355	$42,997.31	$8,932,514
MID Renter-Occupied FEMA IA Verified Losses	1,269	$12,699.39	$707,433
SBA Home Loan Verified Total Loss			$8,855,856
Real Property Insurance Claims			NA
NFIP Identified Damages	2	$ -	$3,540
Damage to Public Housing			NA
Total Housing Loss			**$18,499,344**
Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience)			$24,049,147
Accounting for an additional 30% in increased building and material costs			**$31,263,891**
FEMA payments to repair homes			$2,576,289
SBA Loans to repair homes			$3,328,778
Real Property Insurance Payments			$283,601
NFIP Building Payments			$ -
Total Assistance			**$6,188,668**
Initial Unmet Needs			**$12,310,676**
Total Unmet Housing Need *(Accounting for an additional 30% in funding needed to support rebuilding to higher standards (resilience))*			**$17,860,479**
Accounting for an additional 30% in increased building and material costs			**$25,075,223**

Table 8: Summary Housing Impacts and Unmet Needs Analysis

When accounting for resilience needs and increased construction costs, the estimated total housing impact rises to $31.3 million, reflecting the additional resources required to rebuild to stronger standards and address ongoing inflation in building materials. Against this level of impact, only $6.2

million in assistance has been provided to date, including $2.6 million in FEMA payments, $3.3 million in SBA loans, and about $284,000 in insurance payouts.

This comparison reveals a substantial gap, with the majority of documented housing needs still unmet despite the availability of federal disaster programs. The persistence of these gaps highlights the scale of housing recovery challenges facing Dallas and Autauga Counties and underscores the importance of targeted investment to support long-term, resilient rebuilding.

Unmet Needs Methodology Assessment for Housing

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 Individual Assistance (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”.

For this assessment, the housing unmet needs calculation combines verified losses from FEMA Individual Assistance, SBA disaster home loans, and NFIP claims to establish a baseline estimate of total damages. From this, assistance already provided through FEMA payments, SBA loans, and insurance is subtracted. To account for rebuilding to resilient standards and rising construction costs, a 30% resilience factor and a 30% cost escalation factor are applied, producing the final estimate of total unmet housing need.

Unmet Needs for Owner and Renter Occupied Units

Analysis of FEMA Individual Assistance (IA) and damage data underscores that both owners and renters in Dallas and Autauga Counties experienced substantial housing impacts from the January 2023 tornadoes, though the scale and nature of those impacts differed. Owners made up nearly two-thirds of all applications, representing more than $8.9 million in verified real property losses, with Dallas County alone accounting for two-thirds of that total. Renters, while a smaller share of applicants, showed proportionally higher rates of verified damage (37% vs. 28% for owners) and were heavily concentrated in Dallas County. Across both groups, mobile homes and lower-value housing types were disproportionately represented among damaged units, highlighting the vulnerabilities of households with fewer resources and limited access to insurance coverage.

Although no major-high or severe structural losses were recorded, more than 570 units experienced minor to moderate damage levels, with Dallas County bearing the greatest share. Inspections confirm that only about one-fifth to one-quarter of applicants ultimately received assistance, leaving significant unmet needs across both renter and owner households. Taken together, these trends illustrate that while owners sustained the highest dollar value of losses, renters and mobile home residents remain highly vulnerable, facing persistent gaps in recovery resources that compound existing housing precarity. The following section delves into each of the elements of FEMA IA data for this assessment.

FEMA IA Owner Applications

FEMA IA for owner-occupied units represents a total of $8,932,514 FEMA verified loss. 56% of applicants received inspections, 28% of applicants were found to have damage and 22% of applicants received assistance. Owners from Dallas County submitted 1,873 applications, of which 21% received assistance. Owners from Autauga County submitted 482 applications, of which 25% received assistance. Dallas County had a FEMA verified loss totaling $5,935,030 and Autauga County had a FEMA verified loss totaling $2,997,484.

FEMA IA Owner Occupied						
County	Number of Applicants	Number of Inspections	Number Inspected with Damage	Number Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Dallas	1,873	1,021	510	396	$5,935,030	$61,222
Autauga	482	291	155	121	$2,997,484	$24,773
Grand Total	2,355	1,312	665	517	$8,932,514	

Table 9: FEMA IA verified loss for Owner-Occupied units by County.

FEMA IA Tenant Applications

FEMA IA Assistance for renter-occupied units represents a total of $707,433 FEMA verified loss. Renters from Dallas County submitted 1,184 applications, of which 21% received assistance. Renters from Autauga County submitted 85 applications, of which 22% received assistance. Dallas County had a FEMA verified loss totaling $612,172 and Autauga County had a FEMA verified loss of $95,261. 76% of applicants received inspections, 24% of applicants were found to have damage, and 21% of applicants received assistance.

FEMA IA Tenants						
County	Number of Applicants	Number of Inspections	Number Inspected with Damage	Number Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Autauga	85	61	20	19	$95,261	$13,516.64
Dallas	1,184	903	281	247	$612,172	$11,882.14
Grand Total	1,269	964	301	266	$707,433	

Table 10: Verified loss for FEMA IA tenant-occupied units, by county.

FEMA IA Applications by Housing Type

FEMA IA Applications received from owner-occupied units account for about 65% of all applications, while about 34.5% were from renter-occupied units. Applications from houses/duplexes accounted for about 69% of applications while nearly 9% were from apartments, and nearly 16% were from mobile homes.

FEMA IA Applications by Housing Type								
Residence Type	Number of Applicants	Number Owner Occupied	Percent Owner Occupied	Number Tenants	Percent Tenants	Number Unknown/ Other	Percent Unknown	Percent Housing Type
Apartment	326	2	0.61%	324	99%	0	0%	9%
Assisted Living Facility	0	0	0%	0	0%	0	0%	0%
Boat	1	0	0%	1	100%	0	0%	0%
Condo	2	1	50%	1	50%	0	0%	0%
Correctional Facility	0	0	0%	0	0%	0	0%	0%
House/Duplex	**2,550**	**1776**	**70%**	**732**	**29%**	**0**	**0%**	**69%**
Military Housing	0	0	0%	0	0%	0	0%	0%
Mobile Home	**596**	**473**	**79%**	**118**	**20%**	**0**	**0%**	**16%**
Other	154	75	49%	76	49%	0	0%	4%
Townhouse	23	7	30%	15	65%	0	0%	1%
Travel Trailer	27	21	78%	2	7%	0	0%	1%
Grand Total	**3,679**	**2,355**	**64%**	**1,269**	**34.5%**	**0**	**-**	**-**

Table 11: FEMA IA Applications by Housing Type

Mobile Home Units Impacted by Disaster

While only 6% of Americans live in mobile homes, over 13% of Alabama households are mobile homes.[14] Nearly 16% of all FEMA IA applications were from mobile homes.

Given these findings, the State finds 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 2024 for the Manufactured Housing Survey by the U.S. Census Bureau shows the average sale price for a newly constructed manufactured home in Alabama was $110,700[15], while the average price of new single-family home was $225,579[16]. In that same year, nearly 95,000 new manufactured housing units were produced, accounting for over 10% of all single-family units produced in 2019.

Amid the growing housing affordability crisis, Americans are looking to mobile homes due to their affordability more than ever. According to the Urban Institute, construction of manufactured housing units cost less than half of the price to construct traditionally stick-built single-family home units.

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

[14] https://www.census.gov/programs-surveys/mhs/data/annual-data.html
[15] https://www.census.gov/programs-surveys/mhs/data/annual-data.html
[16] Average House Price by State in 2024 | The Motley Fool

Mobile Home Units Impacted by Disaster			
County	Number of Units	Percent of Total Units in County	Remaining Unmet Need
Dallas	353	10.80%	$155,285
Autauga	243	5.91%	$1,373,069
Grand Total	596	8.08%	$1,528,354

Table 12: Mobile Home Units Impacted by Disaster, by County

FEMA Real Property Damage Owner-Occupied Units

Across the MID counties, 28% of owner-occupied units inspected for real property damage were found to have some level of damage,

FEMA Real Property Damage Owner Occupied Units								
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe	Units with No Damage	Total	% with Damage
Autauga	48	52	13	12	30	327	482	32%
Dallas	204	174	82	25	25	1363	1873	27%
Grand Total	252	226	95	37	55	1,690	2,355	28%

Table 13: FEMA Real Property Damage to Owner-Occupied Units, by County

FEMA Real Property Damage Rental Units

Across the MID counties, 37% 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. 90, No. 5.

FEMA Real Property Damage Renter Occupied Units								
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe	Units with No Damage	Total	% with Damage
Autauga	18	1	1	6	5	54	85	36%
Dallas	289	62	38	42	9	744	1184	37%
Grand Total	307	63	39	48	14	798	1269	37%

Table 14: FEMA Real Property Damage to Rental Units

Total Owner-Occupied and Renter-Occupied Units by County

County	Total Units	Owner-Occupied Units	Owner-Occupied Units (%)	Renter-Occupied Units	Renter-Occupied Units (%)
Dallas	18,880	9,685	60%	6,352	40%
Autauga	24,350	16,542	74%	5,870	26%

Table 15: Owner- and Renter-Occupied units by County

FEMA Individual Assistance (IA) data underscores substantial housing losses in Dallas and Autauga Counties, with Dallas carrying the greatest burden. Owner-occupied units make up nearly two-thirds of applications and $8.9 million in verified losses, including $5.9 million in Dallas. Renters, while fewer in number, showed proportionally higher damage rates—37% of inspected units compared to 28% of owner units—pointing to vulnerabilities in rental housing stock. Mobile homes and rental properties feature prominently among damaged units, yet only one-fifth to one-quarter of applicants ultimately received aid. These findings reveal a clear gap between identified damages and awarded resources, with unmet recovery needs concentrated in Dallas County and in lower-value housing types.

Flood Damage and Insurance Summary

While this disaster was not a flood event, FEMA IA Applications from both Dallas and Autauga Counties were almost entirely without flood insurance. The average of homeowners who applied to FEMA IA that resided in a floodplain and did not carry flood insurance was over 98% in both MID counties, despite their income category.

Number of FEMA IA Applicants with Flood Damage

Although this disaster was not a flood event, FEMA IA data shows minor claims of flood damage. The damage was insignificant, with a count of two owners and two renters with proven flood damage, which accounted for 44% of all applications with flood damage across the State.

County Name	Owner Count with Flood Damage	Owner Total Damage	Renter Count with Flood Damage	Renter Total Damage	Total Count with Flood Damage	Total Damage
Autauga	0	$ -	0	$ -	0	$ -
Dallas	2	$2,960.11	2	$1,455.89	4	$4,416.00

Table 16: FEMA IA Applicants with flood damage

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

FEMA data indicate that a total of 92 residential structures in Dallas and Autauga Counties sustained verified physical damage, primarily affecting single-family homes and mobile homes. The majority of damaged units were located in Dallas County (50 units), with Autauga County accounting for 42 units. Houses and duplexes represented the largest share of affected structures (51 units), followed closely by mobile homes (39 units). No damage was reported across other residential categories such as apartments, condos, or assisted living facilities.

These findings confirm that the 2023 tornadoes primarily impacted traditional single-family housing stock and mobile homes—two of the most common and vulnerable housing types in the affected areas. The concentration of damages in these categories underscores the continued recovery needs among owner-occupied and manufactured housing units, particularly in Dallas County where the storm's path caused widespread localized damage.

	APT	Assisted Living	Boat	College Dorm	Condo	Correctional Facility	House / Duplex	Military Housing	Mobile Home	Other	Town House	Travel Trailer	Grand Total
Autauga	0	0	0	0	0	0	7	0	34	0	0	1	42
Dallas	0	0	0	0	0	0	44	0	5	0	0	1	50
Grand Total	0	0	0	0	0	0	51	0	39	0	0	2	92

Table 17: Major-High and Severe Damage to Houses by County

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

Damage assessments show that a total of 572 housing units across Dallas and Autauga Counties experienced minor-low, minor-high, or major-low levels of damage. The majority of these cases were concentrated in Dallas County (459 units), primarily affecting houses/duplexes and mobile homes. Autauga County reported 113 such units, with mobile homes comprising the largest share of impacts.

	APT	Assisted Living	Boat	College Dorm	Condo	Correctional Facility	House/ Duplex	Military Housing	Mobile Home	Other	Town House	Travel Trailer	Grand Total
Autauga	0	0	0	0	0	0	36	0	72	2	0	3	113
Dallas	0	0	0	0	0	0	364	0	91	0	1	4	459
Grand Total	0	0	0	0	0	0	400	0	163	2	1	7	572

Table 18: Minor-Low, Minor-High, and Major-Low Damage to Houses by Type and County

Mapping FEMA – Verified Losses

The following figures illustrate the spatial distribution and scale of FEMA-verified real property losses across Dallas and Autauga Counties. Together, they provide a layered view of the number of affected applicants, the average losses experienced per household, and the total cumulative dollar impact of the 2023 tornadoes.

The first map below shows the number of FEMA IA applicants with verified real property damages. Concentrations of applicants are heavily clustered in Dallas County, particularly in and around Selma, with smaller but notable clusters present in Autauga County. This reflects the storm's path of destruction across residential areas.

Count of Applicants with Real Property Verified Loss (RPFVL)

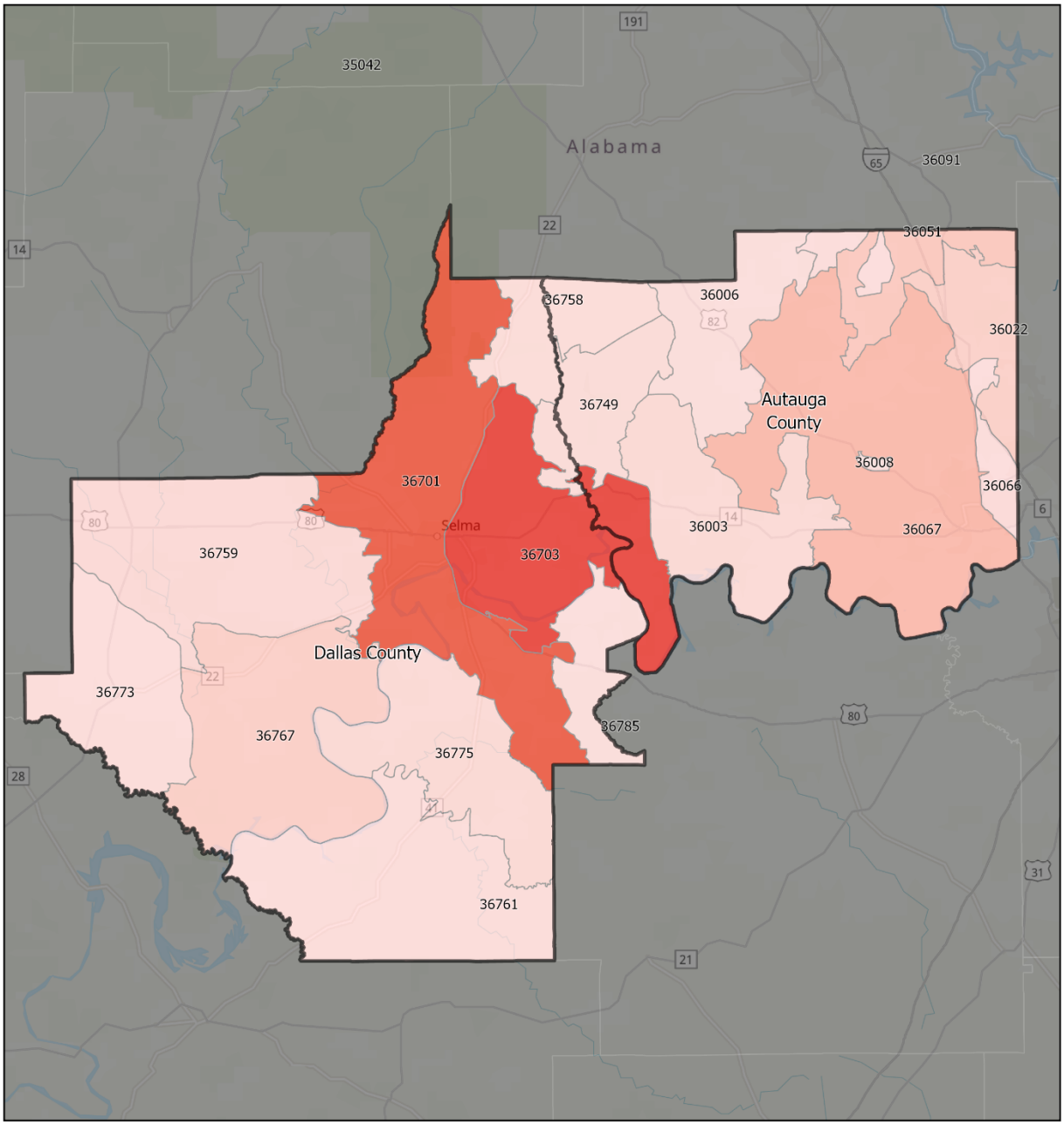


Figure 6: Count of Applicants Real Property FEMA Verified Loss across Alabama's 2023 Tornadoes impact area

The second map highlights the average verified losses per applicant, showing variation in the intensity of damages. While Dallas had the largest volume of applicants, several census tracts in both Dallas and Autauga Counties experienced higher average losses per household, underscoring localized areas of severe damage.

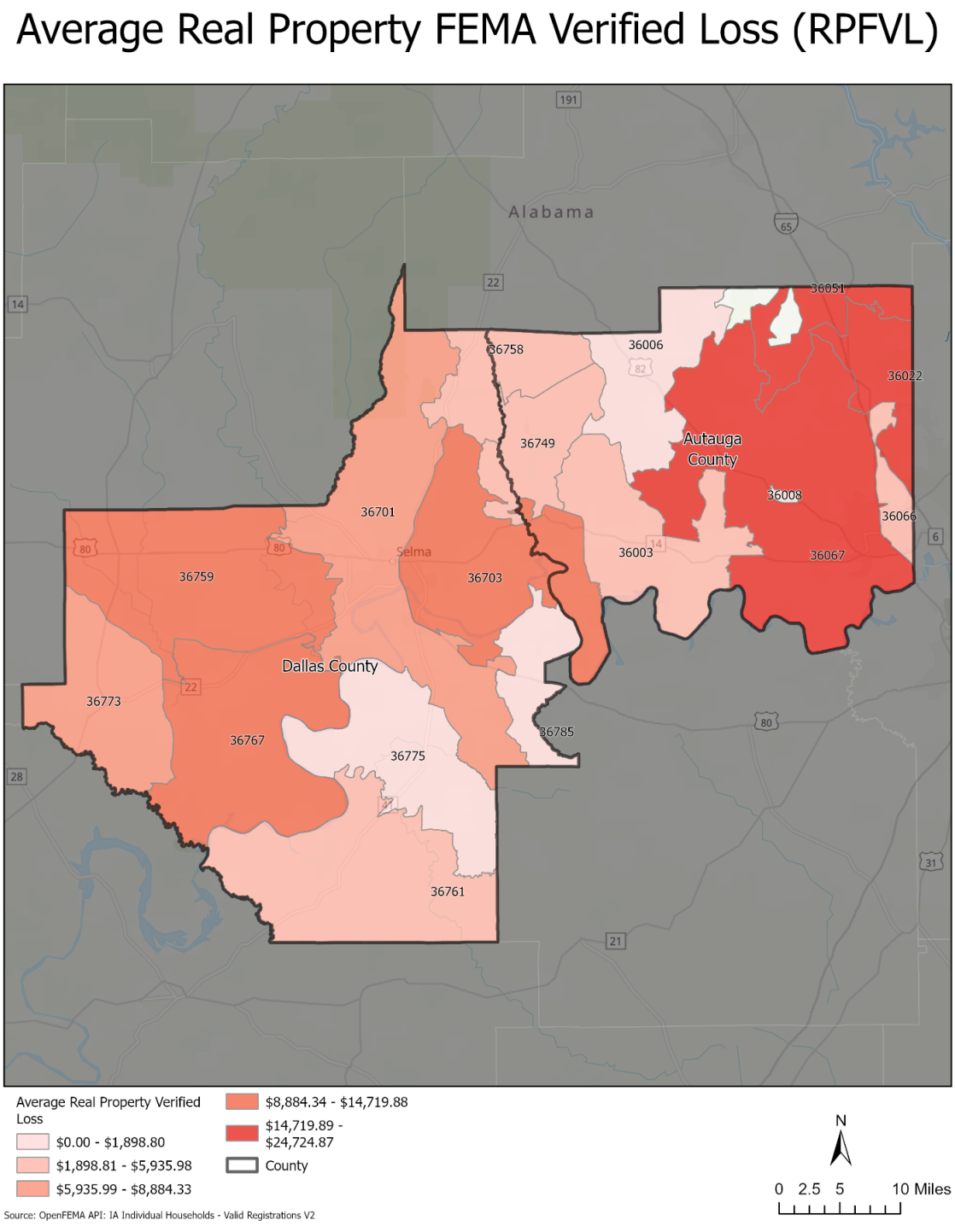


Figure 7: Average Real Property FEMA Verified Loss across Alabama's 2023 Tornadoes impact area

The third map depicts the total cumulative dollar value of verified losses, which are most heavily concentrated in Dallas County, followed by Autauga County. These totals align with the concentration of housing damage and the relative scale of impact in each county.

Total Real Property FEMA Verified Loss (RPFVL)

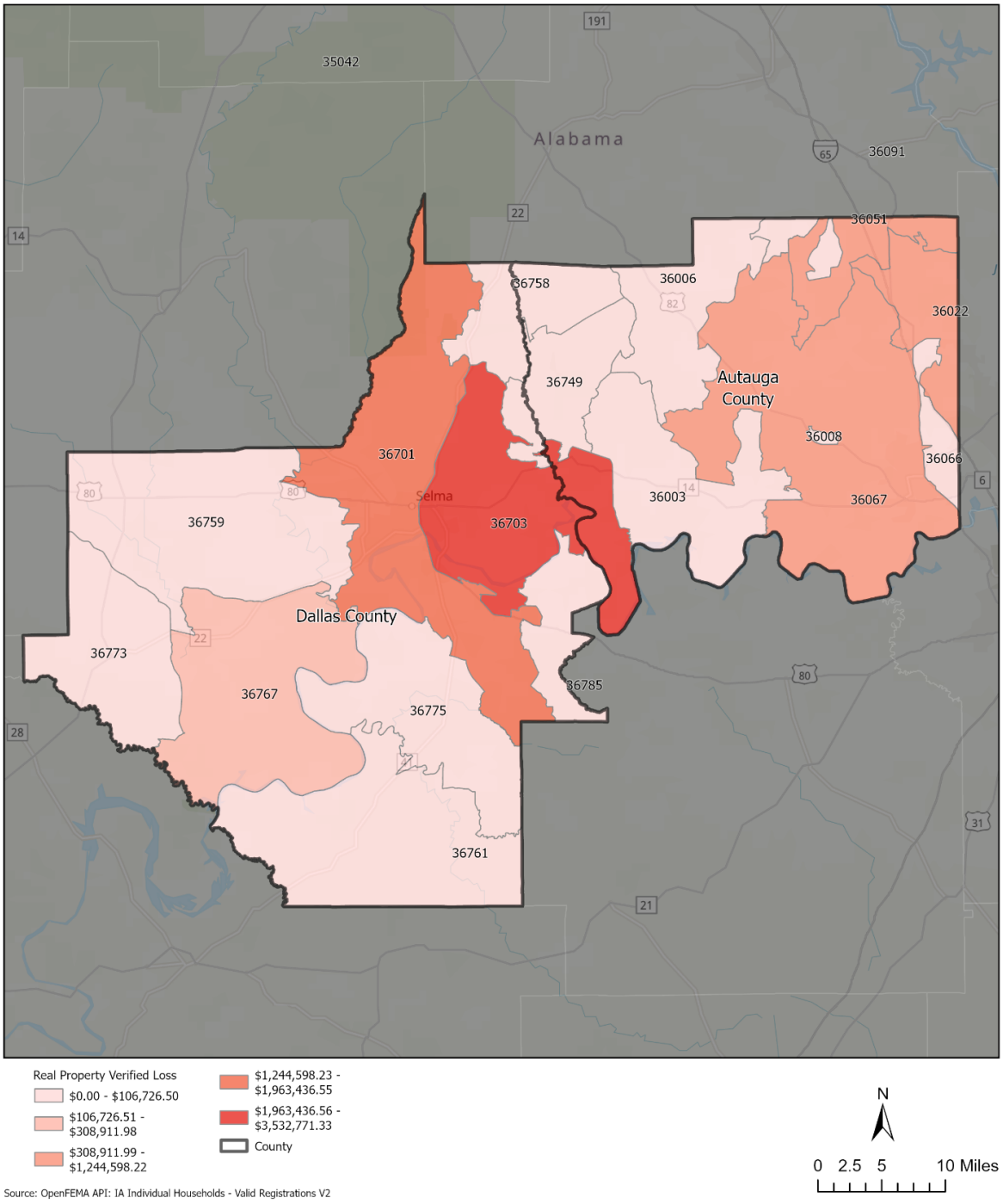


Figure 11: Total Real Property FEMA Verified Loss across 2023 Tornadoes impact area

Taken together, these maps confirm that Dallas County experienced the highest concentration and overall scale of housing losses, while Autauga County experienced more moderate but still significant

impacts. Importantly, the comparison of applicant counts with average and total losses reveals that while Dallas bears the brunt of cumulative damages, certain areas of Autauga absorbed disproportionately high losses per household. These findings highlight the uneven distribution of impacts across the tornado-affected region and reinforce the importance of tailoring recovery resources to both scale and severity of need.

SBA Home Loan – Impacts and Needs

Small Business (SB) Home Loan data provides additional insight into the financial impacts of the 2023 Tornadoes. This dataset captures verified losses, loan assistance, and unmet needs for applicants who pursued SBA disaster home loans. The results highlight both the distribution of losses across categories and the extent to which loan assistance and insurance coverage offset damages.

SB Home Loan Losses, Assistance, and Unmet Needs					
Loss Category	Count of Applications	Total Verified Loss	Total Loan Amount	Insurance Total	Unmet Need
Category 1: Below $12,000	20	$93,318	$109,600	$283,601	$(299,884)
Category 2: $12,000–$29,999	40	$818,537	$723,300	$ -	$95,237
Category 3: $30,000–$64,999	27	$1,222,617	$748,400	$ -	$474,217
Category 4: $65,000–$149,999	23	$2,379,633	$898,400	$ -	$1,481,233
Category 5: $150,000 and above	16	$4,341,751	$1,705,000	$ -	$2,636,751
Grand Total	**126**	**$8,855,856**	**$4,184,700**	**$283,601**	**$4,387,555**

Table 19: Summary SBA Home Loan Analysis for 2023 Tornadoes

As of October 2025, a total of 126 applications were recorded, representing $8.86 million in verified losses. Of this, $4.18 million was provided in loan assistance and approximately $283,600 came from insurance. Despite these resources, a significant $4.39 million in unmet need remains. The majority of unmet needs are concentrated in higher loss categories: Category 5 (losses above $150,000) accounts for $2.64 million, while Category 4 ($65,000–$149,999) adds another $1.48 million. Together, these two categories represent over 90% of the total unmet need. Lower categories showed smaller gaps, and Category 1 (losses under $12,000) reflects a negative unmet need due to insurance payouts exceeding verified loss amounts.

Overall, SBA home loan data confirms that while smaller claims were often covered through loans or insurance, large-loss households continue to face substantial unmet needs. The concentration of gaps in higher damage categories underscores the recovery challenges for severely affected households, many of whom may lack sufficient resources to fully rebuild without additional support.

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. ADECA has reached out to the Selma Housing Authority, the Dallas County Commission, the City of Selma, and the Prattville Housing Authority and is awaiting a reply at this time. ADECA will update at a later date as information becomes available.

While the State has received limited data on the impact the 2023 tornadoes have had on public and affordable housing, ADECA is committed to continued outreach efforts and will update the unmet needs assessment 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 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, 186,962, or 31% of renter households are ELI in Alabama. Of these ELI renter households, 84% are cost burdened, and 70% are severely cost burdened. Further, across the State, there is a shortage of 94,229 affordable and available rental homes for ELI renters. There are only 50 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 2020 to 2022 for both owner-occupied/for sale and rentals. Statewide the data demonstrates an average 2020-2022 rental vacancy rate of approximately 7.8% and a sales vacancy rate of approximately 1.2%. The pre-disaster rental vacancy rate data for the most impacted counties range from 5.2% to 8.4% in Dallas County and range from 2.9% to 6.9% in Autauga County. The pre-disaster for sale vacancy rates ranged from 2.3% to 3.5% in Dallas County and 0.9% to 1.1% in Autauga County.

According to ACS 2017-2021, pre-disaster housing tenure was 60% for owner-occupied units in Dallas County and 74% in Autauga County. The owner vacancy rate was very low at 2% in Dallas County and 1% in Autauga County and the vacancy rate for renters was slightly higher at 9% in Dallas County and 7% in Autauga County.

County	% Owner-Occupied Units	% Renter-Occupied Units	Owner Vacancy Rate	Renter Vacancy Rate
Alabama (Statewide)	68%	32%	1%	11%
Dallas	60%	40%	2%	9%
Autauga	74%	26%	1%	7%

Table 20: Owner and Renter Vacancy Rates

Public Housing Authorities Damaged

ADECA has also reached out to Public Housing Authorities (PHA) in Dallas and Autauga Counties and the Alabama Housing Finance Authority (AHFA) to assess the impacts of the storms. These PHA's are listed below:

- Selma Housing Authority
- Prattville Housing Authority

ADECA has not yet received responses to requests for storm impacts from the PHAs contacted and will update this section as information becomes available.

Multifamily Assisted Housing

ADECA has reached out to the Selma Housing Authority and the Prattville Housing Authority, and we are awaiting a reply at this time. ADECA will update information becomes available.

FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage.

Assisted Housing Impacted by the Disaster

ADECA reached out to the Alabama Housing Finance Authority (AHFA) for information on assisted housing impacted by disaster and are awaiting reply at this time. ADECA will update as information becomes available.

Point-in-Time Count – Impacted by Disaster

HUD's Point-in-Time (PIT) count indicates that a total of 425 individuals experiencing homelessness were identified within the FEMA-declared MID areas, representing about 16% of the statewide count of 2,586. Within these counties, 197 individuals were staying in emergency shelters, 33 in transitional housing, and 195 were unsheltered. The data highlights the presence of both sheltered and unsheltered populations in disaster-impacted areas, underscoring the need for recovery efforts to account for housing instability among people experiencing homelessness.

Scale of Data	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	1,073	295	1,218	2,586
FEMA Declared	197	33	195	425
MID Areas	197	33	195	425

Table 21: Point in Time Count - Type of Shelter

Affected Continuum of Care Entities

Two Continuum of Care entities serve the impacted counties: the Montgomery City & County CoC, which covers Dallas County and reported 345 individuals experiencing homelessness, and the Balance of State CoC, which includes Autauga County and reported 283 individuals. These figures reflect a substantial share of the statewide homeless population and emphasize the importance of coordinating with CoC partners to address the disaster's impacts on vulnerable households lacking stable housing.

CoC Number	CoC Entity	Impacted County	Homeless Count
AL-504	Montgomery City & County CoC	Dallas	345
Alabama Balance of State CoC	Largely Rural CoC	Autauga	283

Table 22: Affected Continuum of Care Entities

ADECA reviewed HUD's Point-in-Time Counts by shelter across the State and post-disaster to assess the need for housing options for disaster-impacted populations experiencing homelessness.

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. 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.

There was documented damage to roads and bridges, public buildings, and public utilities, but the majority of FEMA assistance funds to cover infrastructure went towards debris removal. 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 75% of the eligible project cost, requiring the State to contribute the remaining 25% in cost share.

The Public Assistance Program for FEMA Disaster No. 4684 identified a total of $8,457,379.75 for Category A (debris removal) and $1,698,566 for Category B (emergency protective measures and work donated measures) in public assistance.

Additionally, the State has identified $3,092,217 in public assistance needs 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, Resiliency Measures, Local Match, and the total need (local match + resiliency + increased cost of construction). 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 need to include the future costs of the project including resilience, and then increased costs of construction to more accurately estimate the Federal Share (75%) and the local share/unmet need (25%).

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 + Contingency) and the federal share obligated would represent a potential unmet need of $2,164,552 (Local Match) for identified infrastructure damage eligible under FEMA-PA Categories C-G. Total Cost and Need by PA Category.

PA Category	Project Count	Estimated PA Cost	Federal Share	Local Share (25%)	Resilience 15%	30% Increased	25% Local Match + Resilience

						Cost of Construction	(Total Unmet Need)
A - Debris Removal	11	$8,457,380	$7,709,882	$ -	$ -	$ -	$ -
B - Emergency Protective Measures	5	$1,604,642	$1,258,770	$ -	$ -	$ -	$ -
B - Emergency Work Donated Resources	1	$93,924	$73,477	$ -	$ -	$ -	$ -
C - Roads and Bridges	2	$223,123	$167,342	$55,781	$33,468	$66,937	$156,186
E - Buildings and Equipment	9	$609,055	$456,791	$152,264	$91,358	$182,716	$426,338
F - Utilities	1	$1,999,211	$1,499,409	$499,803	$299,882	$599,763	$1,399,448
G - Parks, Recreational Facilities, and Other Items	3	$260,828	$195,621	$65,207	$39,124	$78,248	$182,580
Grand Total	**36**	**$13,708,736**	**$11,821,864**	**$773,054**	**$463,833**	**$927,665**	**$2,164,552**

Table 23: Infrastructure Unmet Needs, Total Cost and Need by PA Category

Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need
DR-4684	$97,024.64	HMGP	$24,256.16

Table 24: Hazard Mitigation Unmet Needs

Economic Revitalization Unmet Need

The January 2023 tornadoes caused measurable economic losses in Dallas and Autauga Counties, though the overall scale of impact was limited when compared to the extensive unmet housing needs. Damage to businesses included real estate and content losses but left a remaining unmet need.

Disaster Damage and Impacts - Economic Revitalization

The verified business losses from the tornadoes totaled approximately $3.56 million, with $3.39 million attributed to real estate damage and $170,000 to business content losses. These figures represent the direct physical impacts to business properties and equipment within the disaster-affected areas, particularly among small businesses with limited resources to absorb or quickly recover from such damages.

Disaster Impact			
Total Verified Real Estate Loss	Total Verified Business Content Loss	Total Verified Business Loss	
$3,387,078	$169,708	$3,556,786	
Disaster Assistance			
Total Current Real Estate Assistance	Total Current Contents Assistance	Total Insurance	Total Assistance
$1,977,500	$147,400	$0	$2,124,900
Remaining Unmet Need			
Total Applications	Total Verified Loss	Total Assistance	Total Remaining Unmet Need**
31	$3,556,786	$2,124,900.00	$1,431,886
			Resilience 30% added = $1,861,452

Table 25: Economic Revitalization Unmet Needs

Disaster recovery assistance provided for businesses amounted to $2.12 million, including nearly $1.98 million in real estate assistance and $147,400 in contents assistance. No insurance payments were reported in the available data. After accounting for assistance, a total unmet need of approximately $1.43 million remains across 31 business applications. The remaining gap underscores that while assistance helped offset a majority of losses. When taking into account a resilience multiplier of 30%, we are at $1.8M of remaining need.

Although the scale of economic impact is modest relative to housing needs, the damage was concentrated in local service businesses and commercial properties that play a vital role in community recovery. Addressing these gaps is important to sustaining employment, services, and neighborhood revitalization in the disaster-impacted areas. The unmet need for economic revitalization amounted to $3,556,786 of which $2,124,900 of funds were made available, leaving roughly 6% of an unmet need. As a result of this minimal need as compared to the substantial need in housing, the funding made available will not be allocated to economic revitalization. The State will update new information as it becomes available.

Mitigation Needs Assessment

Mitigation Only Activities

The Mitigation Needs Assessment looks at potential natural hazards and threats in the State of Alabama, and in particular—Dallas and Autauga County. The assessment looks at all current and future risks across the state and in the eligible counties for the 2023 Tornadoes Recovery Program. The assessment will help inform mitigation measures taken on housing projects over the life of the program to ensure that homes are not only repaired or reconstructed, but made more resilient to the natural hazards they are likely to face in the future.

ADECA conducted a mitigation needs assessment. The information provided herein is a summary of the findings of the mitigation needs assessment. A copy of the full assessment can be provided upon request. The analysis in the mitigation needs assessment considers hazards with the potential to occur across those Alabama counties impacted by the 2023 tornadoes with specific focus on those hazards most highly prioritized by impacted county hazard assessments and the State of Alabama mitigation plan risk assessment. 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. Per HUD guidance published at Federal Register Vol. 90, No. 95, Monday, May 19, 2025 (90 FR 21328), the Appropriations Act for Public Law 118–158 requires HUD to include with any final allocation for the total estimate of unmet need an additional amount of 15% of that estimate for mitigation activities that reduce risk in the most impacted and distressed (MID) areas.

Mitigation activities are defined by HUD 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.

The State faces a variety of hazardous events that can impact lives, damage or destroy property, and cause suffering and hardship. These hazards have been assessed at the state level and county jurisdictions as part of the hazard mitigation planning process funded by FEMA hazard mitigation assistance (HMA) programs. ADECA thus adopts the risk-based assessment methodology and planning efforts of the Alabama Emergency Management Agency (AEMA) as published in the current State Hazard Mitigation Plan (State HMP), and profiles the research and determinations completed by the agency within this section of the Action Plan. Much of the language contained herein is directly transcribed from the definitions, data analysis approach, and determinations published in the State HMP in order to preserve the integrity of the agency's research and conclusions. Where appropriate, content within this section of the Action Plan, has been truncated to key takeaway information for readers' convenience in identifying important information within a manageable number of pages. For full context on the State's assessment of hazards and risks, readers are encouraged to consult the plan in its entirety found at https://ema.alabama.gov/wp-content/uploads/2024/05/AL-2023-SHMP-Final-Plan.pdf. Readers are also advised that when implementing mitigation projects with this allocation of federal funds, decision-makers and implementing practitioners under ADECA authority shall consult the most current data sets available, GIS resources where practicable, and specific site condition reports to determine the eligibility and feasibility of mitigation activities that reach the most impactful outcome.

Risk Based Needs Assessment

In compliance with the HUD requirements at 90 FR 21328, the tornado action plan includes a risk-based assessment to inform the use of the CDBG–DR mitigation set-aside considering identified current and future hazards. Unlike recovery activities where grantees must demonstrate that their activities ''tie-back'' to the specific disaster and address a specific unmet recovery need for which the CDBG–DR funds were appropriated, activities funded by the CDBG–DR mitigation set-aside do not require such a ''tie-back'' to the specific qualified disaster that has served as the basis for the grantee's allocation. Instead, this set-aside encourages eligible recovery activities that both address the impacts of the disaster (i.e., have "tie-back" to the specific qualified disaster) and incorporate mitigation measures into the recovery activities.

Mitigation solutions designed to be resilient only for threats and hazards related to a prior disaster can leave a community vulnerable to negative effects from future extreme events related to other threats or hazards. When risks are identified among other vulnerabilities during the framing and design of mitigation projects, implementation of those projects can enhance protection and save lives, maximize the utility of scarce resources, and benefit the community long after the projects are complete.

Review of Statewide Data and Analysis

In spirit with HUD guidance at 90 FR 21328, this plan considers the most current analysis of the risks identified in the current FEMA-approved state or local Hazard Mitigation Plan (HMP), the best available data at the time of publishing. For this analysis, the following plans have been consulted:

- 2015 Autauga County Hazard Mitigation Plan.[17]
- 2015 Dallas County, Alabama Natural Hazard Mitigation Plan.[18]
- 2023 Alabama State Hazard Mitigation Plan.[19]
- ADECA, Hurricane Sally and Zeta Risk Mitigation Needs Assessment.[20]

In these reports county and state jurisdictions have studied and reported on the risk of these events to evaluate a comprehensive assessment of hazard risks, considering the spatial extent of past hazards, the likelihood of future impacts, and their interaction with critical infrastructure. Developing this understanding requires evaluating past hazard events and impacts while strategically aligning with and extending current state and impacted county assessments.

For this analysis, the State has chosen to reference the most current information in the 2023 Alabama State HMP as the best available data to provide valuable insights into areas most in need of hazard mitigation investments. Additional coordination with AEMA and county hazard mitigation staff will continue throughout the program lifecycle ensuring appropriate updates to this information and coordinated use of data in the implementation of mitigation projects.

[17] https://ema.alabama.gov/wp-content/uploads/2017/01/autauga-county-hazard-mitigation-plancomplete.pdf
[18] https://ema.alabama.gov/wp-content/uploads/2017/05/dallas-cmp.pdf
[19] https://ema.alabama.gov/wp-content/uploads/2024/05/AL-2023-SHMP-Final-Plan.pdf
[20] https://adeca.alabama.gov/wp-content/uploads/Alabama-DRGR-Public-Action-Plan-Approved-1.12.23.pdf

Summary of Statewide Hazard Mitigation Plan

Alabama's State Hazard Mitigation Plan (HMP), last updated in August 2023, streamlines the identification and implementation of appropriate hazard mitigation actions throughout the state (p. 4-5). The HMP document provides an in-depth analysis of statewide natural hazards, a risk assessment detailing potential losses to physical assets, people, and operations; and a set of goals, objectives, strategies, and actions to guide the state's mitigation efforts. It also includes a comprehensive plan for implementing and monitoring the required aspects of the Plan. This approved and adopted plan serves as the foundation for determining, evaluating, and executing emergency management mitigation activities across Alabama.

The HMP delivers both empirical and qualitative assessments to identify and evaluate potential hazards threatening Alabama. Contributions from various state and federal government agencies resulted in the inclusion of fourteen (14) hazards in the 2023 HMP, such as:

1. Dam and Levee Failure;
2. Drought;
3. Earthquakes;
4. Extreme Temperatures;
5. Flooding (riverine flooding, storm surge, flash floods);
6. Hail;
7. High Winds (hurricanes, tornadoes, windstorms);
8. Landslides;
9. Lightning;
10. Sea Level Rise and Coastal Land Change;
11. Sinkholes and Land Subsidence;
12. Tsunamis;
13. Wildfires; and
14. Winter Storms.

Autauga and Dallas County

For this CDBG-DR mitigation set-aside, the risk-based needs assessment focuses on the two counties in which project funds will be expended on eligible activities. By incorporating multi-hazard risk mitigation into project design, the affected counties can maximize the use of federal funds for future loss prevention. These areas have been identified as:

- Dallas County, the HUD designated MID, and
- Autauga County, the state designated MID.

The risk-based needs assessment applied to the January 2023 tornadoes MID areas focuses on the assessment of hazards present in the two counties as determined by the counties in 2015 HMPs, and detailed analysis of losses and vulnerability for hazards determined to be of significant relevance in the 2023 State HMP using the Risk Factor (RF) analysis prioritization approach. A matrix analysis of hazards identified as relevant by the county jurisdictions can be seen below:

	Autauga County**				Dallas County***		
Hazard	City of Prattville	Town of Autaugaville	Town of Billingsley	Unincorporated County	Orville	Selma	Valley Grande
Dam Failure	R	R	n/a	R	R	R	R
Drought	R*	R*	R*	R*	R	R	R
Earthquakes	n/a	n/a	n/a	n/a	R	R	R
Extreme Temperatures	R*	R*	R*	R*	R	R	R
Flooding (riverine flooding, storm surge, flash floods)	R	R	R	R	R	R	R
Hail	R	R	R	R	R*	R*	R*
High Winds (hurricanes, tornadoes, windstorms)	R*	R*	R*	R*	R*	R*	R*
Landslides	n/a	n/a	n/a	n/a	R	R	R
Lightning	R	R	R	R	R*	R*	R*
Sea Level Rise and Coastal Land Change	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Sinkholes and Land Subsidence	n/a	n/a	n/a	n/a	R	R	R
Tsunamis	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Wildfires	R	R	R	R	R	R	R
Winter Storms	R	R	R	R	R	R	R

R R =Risk

n/a n/a = not applicable to this assessment due to the identification of no risk by the County

* Items with an asterisk indicate hazard categories that are analyzed at the county level as an individual or grouped hazard that differs slightly from the 2023 State HMP

** Autauga County combines the hazards of drought and high heat. It also combines the categories of Hurricane/Tropical Storm/Tropical Depression/High Wind/Strong Wind

*** Dallas County combines hail, high wind, lightning and thunderstorms into the category of Severe Storms.

Table 26: Matrix hazards identified by Autauga and Dallas Counties

Methodology

This risk-based assessment adopts the methodology and planning efforts of the State HMPS in which the assessment of risk was conducted based on FEMA requirements at 44 CFR Part 201 for federal regulations for mitigation planning and the State Mitigation Plan Review Guide for the FEMA official interpretation of these regulations. Thus, the requirements upon which the assessment of risk are based include:

- An overview of the type and location of all natural hazards that can affect the state, including information on previous occurrences of hazard events and the probability of future hazard events. According to the State Mitigation Plan Review Guide, the probability of future hazard events "must include considerations of changing future conditions, including the effects of long-term changes in weather patterns and climate;"
- An overview and analysis of the state's vulnerability to these hazards. According to the CFR, the state risk assessment should address the jurisdictions most threatened by the identified hazards, as well as the state assets located in the identified hazard areas;
- An overview and analysis of the potential losses to the identified vulnerable structures. According to the CFR, the state risk assessment should estimate the potential dollar losses to state assets and critical facilities located in the identified hazard areas.

Hazards Assessment

The hazard list includes hazards that have occurred in the past as well as those that may occur in the future. The identified hazards vary in their probability of affecting the State and in their potential impact on the State.

The State utilized two main sources for characterizing the hazards that affect the State. They are: (1) the record of significant meteorological events compiled in the NWS Storm Events Database, and (2) the record of federal disaster declarations compiled by FEMA. The State implemented a five category ranking methodology including: (1) Probability; (2) Impact; (3) Spatial Extent; (4) Warning time; and (5) Duration enabled the state to classify each of the target hazards empirically. Results of this Risk Assessment identified Flooding (including 100-year flooding and hurricane storm surge), and high winds (including wind, tornadoes, and windstorms) of highest concern for the State. These were followed by six additional hazards of moderate concern and 6 hazards of lower concern.

Vulnerability Assessment

Vulnerability assessment is the process of evaluating the potential loss to a community from natural hazards. Vulnerability depends on the probability of occurrence of a hazard event, the exposure of people and property to the hazard, and the susceptibility of people and property to the hazard. Different methodologies exist for assessing the risk posed by natural hazard events, ranging from qualitative to quantitative. In the State HMP, quantitative methodologies are applied to the six hazards identified by the SHMT as having a high probability, high mitigation potential, and/or well-developed assessment methodology. Those six hazards include extreme temperatures, flooding, high winds, lightning, sea level rise, and sinkholes. Quantitative methodologies were applied to determine the vulnerability of both state assets and local jurisdictions.

State Assets

According to FEMA guidance, State assets "may include state-owned or operated buildings, infrastructure, and critical facilities." Critical facilities are those "structures that the state determines must continue to operate before, during, and after an emergency."[21]

Local Jurisdictions

According to State Mitigation Plan Review Guide, state hazard mitigation plans "must provide a current summary of the most vulnerable jurisdictions," and vulnerability should be analyzed in terms of "damage and loss…related to populations and assets". To meet these criteria, the SHMT decided to apply FEMA's Hazus (Hazard US) loss estimation software. Hazus is an integrated GIS-based simulation system that was designed to promote more consistent and standardized assessments of vulnerability, and more transparent and effective approaches to setting local and state priorities.

The methodology embedded in the Hazus software divides the loss estimation process into three phases: hazard analysis, damage estimation, and loss estimation.

In the hazard analysis phase, the model analyses the physical processes that determine loss. In the case of flood hazards, for example, the model would determine the depth and velocity of flooding associated with different flood frequencies. In the damage estimation phase, the model overlays the hazard layer with an inventory layer to identify the buildings and infrastructure exposed to the hazard, then uses vulnerability curves to estimate the extent of structural damage. Each of the Hazus analyses conducted for Alabama used the default Hazus inventory. This inventory includes information on (1) the general building stock (the number and characteristics of residential, commercial, industrial, agricultural, and other buildings), (2) essential facilities (e.g., police stations), (3) high potential loss facilities (e.g., dams), and (4) selected transportation and utility systems (e.g., highway bridges and water treatment plants). Hazus uses census data to determine the distribution of residential structures, and Dun & Bradstreet data to determine the distribution of non-residential structures. The version of Hazus applied for this plan update uses data from the 2020 Census, National Structure Inventory (NSI) 2022 data from USACE, and primarily 2022 economic values.

In the loss estimation phase, the model quantifies the economic losses caused by the estimated structural damage. Each of the Hazus analyses conducted for Alabama used the damage estimates to calculate two kinds of economic losses: 1) immediate losses related to the damage to structures and their contents (building loss, content loss, and business inventory loss); and 2) business interruption losses related to how long businesses remain inoperable (relocation loss, wage loss, income loss, and rental income loss. Note that income loss refers to business owners' income). The spatial resolution of the modelled losses depends on the modelled hazard. While losses related to flooding and high winds are calculated at the census block level (the smallest census geography), losses related to earthquakes are calculated at the census tract level. The frequency of the modelled losses can also vary depending on the available data. When data is available on the extent of the natural hazard at different probability levels, it is common to present loss estimates in terms of the average annualized loss (AAL). This value condenses the estimated losses at each modelled probability level into a single value representing the average annual loss. Only two of the three Hazus analyses conducted for Alabama present the loss estimates in terms of average annualized loss: the earthquake analysis and the high winds analysis. While data for these hazards was available at a

[21] https://ema.alabama.gov/wp-content/uploads/2024/05/AL-2023-SHMP-Final-Plan.pdf

series of probability levels, data for flood hazards was only available for the 1%-annual-chance flood. Loss estimates for flood hazards are therefore presented for only the 1%-annual-chance event.

Determination of Risk

According to the State HMP, the 2023 planning process involved applying a methodology for prioritizing the list of identified hazards for further analysis to include a Risk Factor (RF) analysis, which ranks hazards by the degree of risk they pose based on a set of factors deemed important by the SHMT and other stakeholders.

Applying this approach, the SHMT and FEMA determined that detailed vulnerability assessments should be conducted only for certain hazards. The RF analysis assigns numeric values to hazards based on factors such as probability, impact, spatial extent, warning time, and duration, aggregated into a composite RF value. Higher RF values indicate greater risk.

Probability assesses the frequency of hazard events, impact measures potential loss of life and property, spatial extent covers the geographic area affected, warning time evaluates advance notice, and duration indicates how long the hazard lasts. These values are derived from historical data, local knowledge, and consensus from the SHMT.

Hazard Profiles and Local Jurisdiction Risk

The following hazards are depicted here in alignment with State HMP carrying through the data assessment and planning analysis performed by the AEMA State Hazard Mitigation Team (SHMT) with the input of a broad range of stakeholders from federal agencies, state agencies, institutions of higher education, and local organizations.

The hazard list selected for the State HMP includes hazards that have occurred in the past as well as those that may occur in the future. In addition, hazards with the greatest chance of significantly affecting the state and its residents are included. A variety of sources were consulted to determine hazards that have impacted the state historically or that may occur in the future. These included national, regional, and local sources. Some of the specific sources include:

- AEMA;
- US Geological Survey (USGS);
- Alabama Department of Insurance;
- Alabama Forestry Commission;
- NOAA;
- Geological Survey of Alabama (GSA);
- ADECA;
- FEMA.

Input from experts at these agencies, and many others, was also solicited during the review of the hazards.

Mitigation Assessment Conclusion

The Mitigation Needs Assessment outlines several risks faced by residents in Dallas and Autauga Counties. Areas of highest risk, particularly for this geographic footprint, include high winds and flooding. Based on the overall housing need in the HUD and State identified MIDs, and the available

CDBG-DR funding, the 2023 Tornadoes Recovery Program will be fully focused on housing. With that being the case, the mitigation set aside of at least 15% will be dedicated to mitigation efforts around housing. Specifically, the funds will be used to reduce risk by: elevating structures as needed, utilizing high-quality and durable materials, and ensuring homes are built to modern code in order to mitigate future impacts of all potential risks, in particular flooding and high winds.

Connection of proposed programs and projects to unmet needs and mitigation needs.

As required by the Federal Register/Vol. 90, No. 95/May 19, 2025 (90 FR 21330), ADECA will allocate at least 80% of the funds to address unmet needs with HUD-identified "most impacted and distressed" areas. The remaining 20% of the allocation may be used to address unmet needs that received a presidential major disaster declaration for the 2023 tornadoes. HUD has identified Dallas County as the "most impacted and distressed" (MID) area and ADECA's unmet needs assessment further localizes the greatest impacts and unmet needs in Alabama. ADECA is electing to identify Autauga County receiving a Presidential declaration for individual assistance as the State MID area.

This Action Plan primarily considers and addresses housing unmet need and incorporates mitigation activities. This aligns with ADECA's overall assessment of unmet needs which indicates approximately 86% of remaining need is related to housing while simultaneously highlighting that the majority of affected applicants were single family homeowners.

At least 70% of all program funds will benefit LMI persons or households. As the program submitted in the Action Plan is limited to benefitting LMI persons, 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.

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; 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 2015 Autauga County Hazard Mitigation Plan, 2015 Dallas County, Alabama Natural Hazard Mitigation Plan, 2023 Alabama State Hazard Mitigation Plan (SHMP), the most recent risk assessment completed through the FEMA hazard mitigation planning process and the ADECA, Hurricane Sally and Zeta Risk Mitigation Needs Assessment. The SHMP was completed by AEMA 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 2023 SHMP identifies hazards based on the history of disasters within the State and lists goals, objectives, strategies, and actions for reducing future losses.

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. ADECA will also consider and incorporate the following established planning initiatives as it responds to the impacts and unmet needs of the 2023 Tornadoes:

- 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

Eligible Cost Category	Unmet Need	% of Unmet Need (rounded to 100%)	% of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Allocation Amount (Including Mitigation Set-Aside)	% of CDBG-DR Allocation (rounded to 100%)
Administration				$385,950	5%
Housing	$25,075,223	86%	80%	$7,333,050	95%
Infrastructure	$2,164,552	7%	0%	$ -	0%
Economic Revitalization	$1,861,452	6%	0%	$ -	0%
Total CDBG-DR Grant for 2023 Tornadoes Plus Up				$7,719,000	100%

Table 27: CDBG-DR Program Allocation and Funding Thresholds

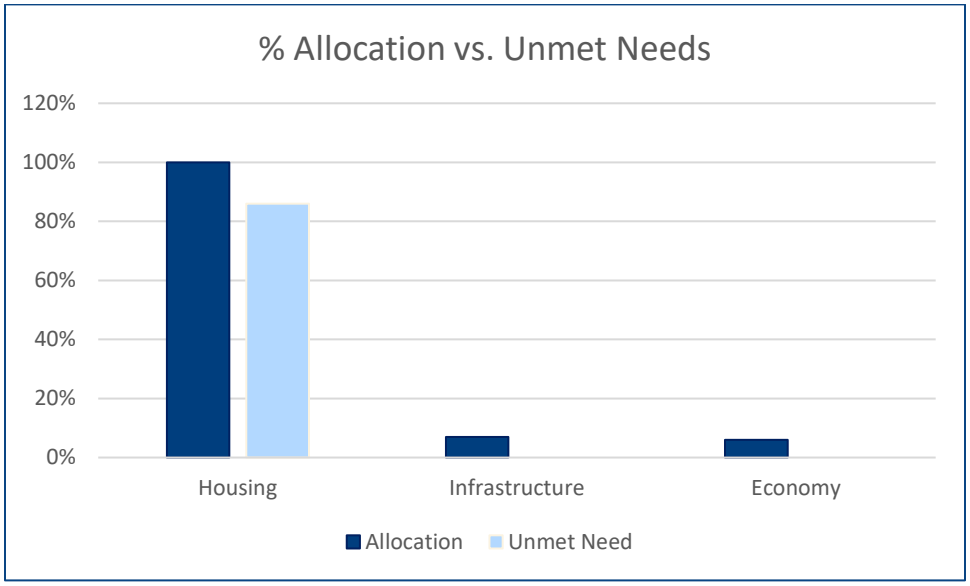


Table 28: % Allocation vs. Unmet Needs

Compliance Statement

ADECA will ensure all programs comply with the following:

- Section 109 of the HCDA, 42 U.S.C. 5309;
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act), 42 U.S.C. 3601 – 19;
- Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794; The Americans with Disabilities Act of 1990,42 U.S.C. 12131 et seq.; and
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).

Minimizing Displacement

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, ADECA will coordinate with all agencies and entities necessary to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are met.

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.

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 will also 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 the 2023 tornadoes CDBG-DR activities, will ensure minimized 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 the use of eminent domain.

Allocation and Award Caps

ADECA is the lead agency and responsible entity for administering $7,719,000 in CDBG-DR funds allocated for the January 2023 tornadoes recovery efforts. CDBG-DR funds from this specific Plus-Up allocation available to address unmet needs will be allocated to basic program categories pursuant to the table below.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
Administration	$ 385,950.00	5.0%			
Planning	$ -	0%	0%		
Housing	$ 7,333,050.00	95%	100%	80%	100%
Infrastructure (CDBG-DR Mitigation Set-aside)	$ -	0%	0%	0%	0%
Economic Revitalization	$ -	0%	0%	0%	0%
Public Services	$ -	0%	0%	0%	0%
TOTAL	**$ 7,719,000.00**	**100%**	**15%**	**80%**	**100%**

Table 29: CDBG-DR Program Allocation and Funding Thresholds

Funding Criteria

General Exception Criteria

ADECA will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards, or to reasonably accommodate a person with disabilities, and to further advance an impactful and efficient recovery, in accordance with 2 CFR 200 - Cost Principles. ADECA may make exceptions to program policy, at its discretion. Specific guidance regarding policy exceptions will be outlined in program guidelines, as applicable.

General Obligation and Expenditure of Funds

In accordance with the March 31, 2025, HUD Memorandum 25-03 that revises additional sections of the Universal Notice (90 FR 1754), pursuant to 2 CFR Part 200 and Executive Order 14218 (90 FR 10581), ADECA ensures that no federal public benefit is provided to any individual who is an ineligible alien, defined as someone who has entered the United States illegally or is otherwise unlawfully present.

Administration

ADECA is the lead agency and responsible entity for administering $7,719,000.00 in CDBG-DR funds allocated for disaster recovery. ADECA has prioritized a program 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 Housing as the primary unmet recovery need. ADECA's program design aims to address these unmet needs and increase resilience against future disasters in impacted communities.

The State intends to implement a program that results in mitigation and resilience improvements in impacted areas 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 86% of the total remaining unmet need in impacted areas. As such, 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.

For this plus-up allocation, ADECA has opted to utilize 5% of the current allocation for administration costs. As further described in the Grant Funding Interchangeability section below, program administrative costs for the first allocation will be funded from the Public Law 117-43 CDBG-DR allocation. Funds have been allocated to the administration budget for the first allocation 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 15% of grant funds to planning activities, as allowed by HUD. As required by the Federal Register, the State will spend a minimum of 80% of the total allocation in the HUD-identified MID area of Dallas County. Remaining funds will be used to carry out eligible activities in the State-Designated MID area, Autauga County. Additionally, no less than 70% of the total allocation will be expended to benefit LMI persons.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration	$ 385,950.00	5%

Table 30: Grantee Administration Activity(ies) Overview

Grant Funding Interchangeability

Public Law 117-43[22] permits grantees that receive funds appropriated under Public Law 117-43 and any prior or future appropriations for activities authorized under title I of the HCDA related to unmet recovery needs, to use grant funds interchangeably for the same activities in overlapping HUD-identified or Grantee-identified Most Impacted and Distressed (MID) areas if the activities address unmet needs of both disasters. ADECA intends to utilize funding appropriated under Public Law 117-43 for Hurricanes Sally and Zeta as program administrative costs and activity costs for activities proposed in this Action Plan. In addition, ADECA intends to utilize remaining funding associated with Public Law 113-2[23] to supplement the funding allocated to the State of Alabama for recovery from the 2023 Tornadoes. This funding will be utilized as activity costs in the state-identified MID county, Autauga County due to overlapping impacts from each allocation. Below are tables outlining the intended use of prior funding allocations and a high-level budget breakdown.

Funding Interchangeability		
Funding Allocation	**Amount of Funding**	**Type of Costs**
Public Law 113-2 (2011 Tornadoes) B-13-DS-01-0001	$891,553.80	Grant Funds in State-identified MID County[24]
Public Law 117-43 (2020 Hurricanes Sally and Zeta) B-21-DZ-01-0001	$1,696,292.00	Program Administrative Costs
Public Law 117-43 (2020 Hurricanes Sally and Zeta) B-21-DZ-01-0001	$2,080,000.00	Grant Funds in HUD-identified MID County[25]
Public Law 117-328 (2023 Tornadoes) B-23-DG-01-0001	$10,403,000.00	Grant Funds in HUD- and State-identified MID Counties
Public Law 118-158 (2023 Tornadoes Plus-Up) B-25-DG-01-0001	$7,719,000.00	Grant Funds in HUD- and State-identified MID Counties

Table 31: Grant Funding Interchangeability Breakdown

[22] The Continuing Appropriations Act, 2023 (Pub. L. 117-180), approved September 30, 2022, and the Department of Housing and Urban Development Appropriations Act, 2023 (Pub. L. 117–328, Division L, Title II), approved December 29, 2022.
[23] Disaster Relief Appropriations Act of 2013 (Public Law 113-2, approved January 29, 2013).
[24] Autauga County is included as a MID county under both the P.L. 113-2 allocation and the P.L. 117-328 allocation.
[25] Dallas County is included as a state-identified MID county under the P.L. 117-43 allocation and is the HUD-identified MID county under the P.L. 117-328 allocation.

High Level Budget	
[A] Total Budget	$22,789,845.80
[B] Admin Budget = PAC From P.L. 117-43 Allocation & 5% from Plus-Up Allocation	$2,082,242.00
[C] Programs Budget = [A] - [B]	$20,707,603.80

Table 32: ADECA High Level Budget Breakdown

Housing

Housing Program Overview

ADECA will implement a state-administered housing rehabilitation/reconstruction program. The MOD described herein will support the recovery of residents by supporting the critical recovery area of housing and prioritize MID areas and LMI households, serving the most vulnerable and hardest to reach populations impacted by the tornadoes. ADECA will continue to update the unmet needs assessment as needed.

Approximately 69% 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 all of its awarded funds to a state-administered single-family rehabilitation/reconstruction program that addresses the unmet needs of impacted households that reside within the MID and State-MID counties. The funding allocated to this single-family housing recovery initiative is supported by the significant amount 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 mobile homes; relocation assistance; inclusion of mitigation and resilience measures, and related public services, as needed.

The following table provides an overview of the programs, their respective budgets, and estimated benefits to LMI households:

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Home Recovery Alabama Program – Tornado Recovery (HRAP-TR)	$7,333,050	100%
Housing Programs Total	**$7,333,050**	**100%**

Table 33: Housing Program Overview

Home Recovery Alabama Program – Tornado Recovery (HRAP-TR)

Amount of CDBG-DR Funds Allocated to this Program: $7,333,050

- At least $5,133,135 reserved for LMI households with an estimated $7,333,050 on LMI (100% of allocation)

Eligible Activity(ies):

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 mobile home units
- Hazard mitigation
- Elevation
- Relocation assistance
- Demolition only
- Public service (e.g., housing counseling, legal counseling, job training, mental health, general health, etc. ((15%) cap)
- Administrative activities associated with recovery of single-family housing stock

National Objective: Low- and Moderate-Income Housing (LMH) - 24 CFR.570.208(a)(3)

Connection to Unmet Needs: As required by the Federal Register/Vol. 90, No. 95/May 19, 2025 (90 FR 21330), ADECA will allocate at least 80% of the funds to address unmet needs with HUD-identified "most impacted and distressed" areas. The remaining 20% of the allocation may be used to address unmet needs that received a presidential major disaster declaration for the 2023 tornadoes. HUD has identified Dallas County as the "most impacted and distressed" (MID) area and ADECA's unmet needs assessment further localizes the greatest impacts and unmet needs in Alabama. ADEA is electing to identify Autauga County receiving a Presidential declaration for individual assistance as the State MID area.

This Action Plan primarily considers and addresses housing unmet need and incorporates mitigation activities. This aligns with ADECA's overall assessment of unmet needs which indicates approximately 86% of remaining need is related to housing while simultaneously highlighting that the majority of affected applicants were single family homeowners.

At least 70% of all program funds will benefit LMI persons or households. As the program submitted in the Action Plan is limited to benefitting LMI persons, 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.

Lead Agency and Distribution Model: ADECA will administer the program. To evaluate environmental factors for CDBG-DR-funded projects and activities, ADECA, as a responsible Entity (RE), will ensure compliance with the environmental requirements listed under 24 CFR 58.

Program Description: To assist the households most severely impacted by the disaster, the State will directly implement the Home Recovery Alabama Program – Tornado Recovery (HRAP-TR) 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 Mobile Homes.
3. Inclusion of needed and appropriate mitigation and resilience measures, including but not limited to elevation, roof reinforcement, or floodproofing.

The State will require construction methods, standards, and materials that are high quality, durable, energy efficient, sustainable, and mold resistant. All rehabilitation, reconstruction, and new construction will meet all applicable state and local building codes, as well as any minimum construction standards required under the Federal Notice (88 FR 82996).

If older or obsolete products are replaced due to rehabilitation work, the State 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 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 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 — 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 for eligible homeowners and rental property owners in impacted areas to repair, reconstruct, or replace storm-damaged properties 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.

Eligible Geographic Areas: Dallas and Autauga Counties

Other Eligibility Criteria: The Home Recovery Alabama Program – Tornado Recovery (HRAP-TR) will offer pathways to assist both owner-occupied and rental housing units. Priority will be given to owner-occupied 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 the 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 damage 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

As stated above priority will be given to owner occupied housing units. However, to be eligible for program funding rental property applicants must meet all criteria listed below:

- Applicant must not be in bankruptcy or active foreclosure.
- Property taxes and mortgage must be current (if applicable) and in good standing.
- Applicant 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.
- Property must not be located in a FEMA-designated 100-year floodplain.
- Properties must be unoccupied at the time of application.
- At least 51% of units must be occupied by certified LMI households if awarded program funds.

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

Program Priorities: Applications for owner-occupied households will be prioritized as follows:

- **Priority 1:** LMI (80% AMI and below) with both an age-dependent household member (minor child(ren) or elderly person(s)) AND disabled household member(s);
- **Priority 2:** LMI (80% AMI and below) with either an age-dependent household member (minor child(ren) or elderly person(s)) OR disabled household member(s);
- **Priority 3:** LMI (80% AMI and below) with neither an age-dependent household member (minor child(ren) or elderly person(s)) OR disabled household member(s);
- **Priority 4:** Rental Property (Landlord) Applications- should funding remain available after assisting previous priorities, rental applications may be processed.

For program priorities, age-dependent households include those with members who are either 65 years or older, or 17 years or younger.

Maximum Award Amount: $235,000

Maximum Income of Beneficiary: 80% of Area Median Income (AMI)

Mitigation Measures: Hazard mitigation measures will be incorporated into construction activities where determined to be necessary and cost reasonable, in accordance with applicable HUD guidance and local code requirements, and program goals for increased resilience. For relocation activities, replacement housing units, including manufactured housing units (MHUs), must be sited

outside the 100-year floodplain, consistent with program objectives to relocate homeowners out of high-risk areas.

Reducing Impediments for Assistance: The HRAP-TR is available to all Dallas and Autauga County homeowners who have been impacted by the qualifying disaster event of the January 2023 Tornadoes. The intake center will be accessible to individuals with disabilities (ADA compliant), and communication assistance will be provided upon request. All Dallas and Autauga County homeowners will have equal access to the application process.

To encourage participation in disaster recovery programs by impacted individuals, ADECA will identify those expected to benefit from CDBG-DR-funded programs, establish program-specific prioritization criteria where appropriate, and implement a data-driven, targeted outreach and engagement campaign throughout the Most Impacted and Distressed (MID) area to ensure broad and effective program participation.

General Information

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 initial allocation notice, ADECA held one public hearing on June 25, 2024, in the HUD-identified MID area of Dallas County -- to solicit feedback on the proposed recovery/mitigation program.

All comments ADECA received at the public hearing have been 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. In addition to the initial Public Hearing and Public Comment period, ADECA consulted with various State and local stakeholders via consultation survey during the development of this new Action Plan including the latest plus-up allocation. There will also be an additional Public Comment period to ensure all feedback is taken into account.

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 notice and the applicable provisions at 24 CFR 91.115.

Consultation of Developing the Action Plan

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.

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 outreach to local governments, state agencies, and non-governmental organizations in the impacted areas.

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, non-governmental organizations, and public housing authorities, among other entities, to solicit feedback and inform the Action Plan.

Partners Consulted	Consultation Description
Federal Partners (FEMA, SBA)	• ADECA has worked closely with the HUD field office in Birmingham and the regional office in Atlanta to develop its disaster recovery program 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 reached out to 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. Updated data from these sources was unavailable at the time of the initial action plan development, but became available for the HRAP-TR Plus Up action plan and was utilized accordingly.
Local/State Government	• ADECA has collaborated with officials in the City of Selma, Dallas County, and Autauga County (HUD- and State-identified MID areas). • Consultation with local governments will continue throughout implementation of the grant, including and especially with the City of Selma, Dallas County Commission, and Autauga County, since housing recovery activities will take place exclusively in those areas. • Consultation surveys have been sent out to these groups to ensure the ability to provide adequate feedback was available.
Indian Tribes	• ADECA has reached out to the State of Alabama Indian Affairs Commission to coordinate outreach to any federally- or state-recognized tribes that were potentially impacted by the disaster. • Additional meetings will be scheduled with any federally- or state-recognized Indian tribe, upon request.

Nongovernmental organizations	• Several non-governmental organizations in Alabama were consulted with in the development of the action plan, including:
	  • Alabama-West Florida United Methodist Conference
	  • Selma Dallas Chamber of Commerce
	  • United Way Selma
	  • Edmundite Missions Selma

State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	• ADECA reached out to and collaborated with the Governor's Office of Volunteer Services, Alabama Emergency Management Agency (AEMA), Autauga County Emergency Management Agency, and Dallas County Emergency Management Agency to obtain data and damage assessments to inform the unmet needs assessment and housing recovery activities proposed by this action plan.
Agencies that manage local Continuum of Care	• Mid-Alabama Coalition for the Homeless • Alabama Rural Coalition for the Homeless

Public Housing Agencies	• As detailed more extensively in the Unmet Needs Assessment in this action plan, ADECA has conducted outreach with public housing authorities, including the Selma Housing Authority and the Prattville Housing Authority.
State Housing Finance Agencies	• Coordinated with Alabama Housing Finance Authority (AHFA) via consultation survey.
Other Stakeholders	• Various other organizations in Alabama were invited to attend the public hearing on June 25, 2024 and provide feedback during the public comment period for the action plan developed following the initial allocation of funds from the original HRAP-TR Action Plan. Notification of the public hearing was emailed to 500+ from the interested parties list which consisted of individuals and various stakeholders. • In addition to the activities above, ADECA is publishing this Action Plan on https://adeca.alabama.gov for a 30-day public comment period to gather additional feedback or additional information that may be desired since the initial publication and comment period.

Consultation Survey Responses

To date three (3) groups have responded to ADECA via the consultation surveys that were submitted. Full survey responses can be made available upon request. Updates will be made as needed should additional information come in from updated surveys. See details below regarding summarized findings of completed surveys for the HRAP-TR Plus Up Action Plan development.

1. **City of Selma**: the City of Selma reported displacement of residents, business closures, infrastructure damage, and housing damage for single-family, multi-family, renter-occupied, and owner-occupied housing. The City of Selma indicated between $5 and $25 million in damage and that the storm worsened existing poverty and infrastructure issues in Selma. Selma noted that vulnerable populations, especially LMI and elderly individuals faced multiple challenges, specifically housing related. The City of Selma indicated that most immediate support is needed for housing repairs and reconstruction (owner and renter), infrastructure repairs and mitigation, and economic and business assistance.
2. **United Way of Selma & Dallas County:** The nonprofit organization, United Way of Selma & Dallas County, completed and returned a survey response indicating that they received damage from the 2023 tornadoes and Hurricane Zeta prior in 2020. They indicated that they experienced between $10,000 and $49,000 in financial loss as a result of the 2023 tornadoes (between 10-24% of business). None of the employees were displaced or laid off due to the tornadoes and the workforce has returned to its pre-disaster size. They have received insurance funds, and this has fully covered their recovery needs.
3. **Dallas County Emergency Management:** Dallas County Emergency Management reported housing damage for single and multi-family housing (both owner and renter occupied), infrastructure damage, displacement of residents, business closure, and environmental damage. Overall, Dallas County EMA reported $25 million in damages.

They reported significant challenges to vulnerable populations with housing recovery due to low-income, lack of insurance, and homes not built to modern code. They indicated that housing repairs and reconstruction and rental assistance require the most immediate support. Lastly, Dallas County EMA indicated many citizens were either unable to apply for FEMA or only were provided temporary assistance; they would like to see home rebuilt or repaired to stronger standards to make individuals more resilient long-term.

As mentioned above, additional responses will be reviewed and updated as needed, and full survey responses may be provided upon request.

Public Comments

The Action Plan will be submitted for public comment in English to the website at http://adeca.alabama.gov on October 18, 2025, with a thirty (30) day public comment period as required by HUD ending on November 17, 2025.

The Action Plan can be viewed online or at the ADECA office at 401 Adams Avenue, Room 524, Montgomery, Alabama 36104, for the duration of the public comment period. All written comments should be received in the ADECA office no later than the close of business on Monday, November 17, 2025. Such comments are to be addressed to Mr. Trent Williams, ADECA, P.O. Box 5690, Montgomery, AL 36103-5690, or e-mailed to DisasterRecovery@adeca.alabama.gov.

Following consideration of comments received, ADECA will identify and make any necessary revisions to the Action Plan, after which the final Action Plan will be submitted to HUD for approval. All comments ADECA receives at 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 as an appendix in the final version of the action plan, in addition to a summary of the comments received and ADECA's response to each.

Public Hearings

ADECA was not required to hold public hearings to solicit input from the public on this Action Plan. Prior to the submission of the action plan for the original CDBG-DR funding allocation, ADECA conducted a public hearing in Dallas County on June 25, 2024 to solicit public comments. The hearing provided reasonable opportunity and maximum accessibility for citizen comment and was held in the HUD-identified MID area, where at least 80% of ADECA's grant amount will be expended. The hearing was held at the regional community college in Selma, AL, which was located within 30 minutes from all impacted areas.

During the hearing, the State presented a detailed breakdown of the allocation and the State's proposed use of the funds, including details relating to the specific recovery program the State is proposing to implement. When reviewing the action plan, ADECA considered all public comments it received at the hearing.

Access to Public Hearings

The public hearing was advertised on the ADECA website on June 12, 2024 (14 days prior to the first hearing) and was publicized in the print and online versions of the *Montgomery Advertiser* on June 9, 2024, and the *Selma Times Journal* on June 8, 2024, in accordance with ADECA's Citizen Participation Plan. The hearing was held in a facility physically accessible to persons with disabilities,

with accommodations to ensure full participation opportunities. The notice of the public hearing also included instructions for persons with disabilities or special needs who may require unique materials, services, or assistance to contact ADECA so that accommodation could be arranged. Following the hearing, ADECA posted to the public website a video recording of the entire hearing that included closed captions and subtitles.

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 provided on any notices and on ADECA's website. Materials will be made available in various formats and shall be accessible to persons with disabilities. Persons with disabilities or special needs who may require unique materials, services, or assistance with accessing program materials should contact ADECA.

Consideration of Public Comments

All comments ADECA receives during the public comment period will be considered when developing this Action Plan. Any changes ADECA makes to the Action Plan in response to public comments will be included as an appendix in the final version of the Action Plan, in addition to a summary of the comments received and ADECA's response to each.

Citizen 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 has made available on its public website–*https://adeca.alabama.gov*—detailed Fraud, Waste, and Abuse Policies and Procedures to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

As required per the allocation notice and consistent with ADECA's Citizen Participation Plan, 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 their representative, and are to be submitted to the applicable local, state, or federal government agency, for resolution.

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

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. Complainants needing assistance submitting a formal written complaint may call ADECA at (334) 242-5100.

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.

Public Website

ADECA will maintain a public website--https://adeca.alabama.gov/--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, activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

Specifically, ADECA will make the following items available: the Action Plan created using Disaster Recovery Grant Reporting (DRGR),including all amendments; each Quarterly Performance Report (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 and, a summary including the description and status of services or goods currently being procured by the grantee (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, may not be posted to ADECA's public website.

In addition, ADECA's public website will include information regarding all disaster recovery activities assisted with these funds, including environmental notices and reviews. 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 to the website will be made as and when necessary. Additionally, all documents will be made available in a form accessible to persons with disabilities, as needed.

Modifications to the Action Plan

Over time, recovery needs will change. ADECA will amend the disaster recovery Action Plan as often as necessary to best address long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop over time 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, grantee-administered activity, or another category) and will be published on the ADECA public 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,
- A proposed reduction in the overall benefit requirement, or
- The allocation or reallocation of 10% of the total allocation.

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.

Nonsubstantial 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. A non-substantial amendment does not require posting for public comment. 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 a public comment period may not be provided.

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. ADECA will notify HUD five (5) business days before the change(s) is effective.

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

Performance Reports

ADECA is dedicated to fostering a transparent and efficient process for the preparation of performance reports and will adhere to the specific reporting formats and data fields mandated by the HUD within the HUD Disaster Recovery Grant Reporting (DRGR) System. ADECA's primary objective is to deliver verified information that is substantiated by comprehensive documentation. This information not only showcases the tangible impact of our efforts but also incorporates valuable community feedback, reflecting the effectiveness of the CDBG-DR projects in meeting the critical needs of our residents. Through this process, ADECA will aim to ensure accountability and enhance the overall well-being of our local community. Changes and amendments to projects and programs will be recorded in the DRGR system. Any modifications to the Action Plan (AP) will be documented in both DRGR and the official Action Plan. Changes to projects set up in DRGR will only be made after HUD approves the changes in the formally submitted AP. Programmatic changes and revisions, as well as the recording of accomplishments and reporting, will also be managed through DRGR. Any necessary updates or changes in DRGR will occur within five business days of receiving approval from ADECA's Disaster Recovery Manager, or, in the case of Action Plan amendments, within five days of HUD approval. The ADECA Disaster Recovery Manager, in coordination with ADECA's CDBG-DR consultant, will oversee all updates, revisions, and reporting requirements needed to ensure compliance with DRGR programmatic regulations. ADECA will ensure that staff receive adequate training and that consultants possess sufficient knowledge and familiarity with DRGR for effective management of the DRGR Database.

Quarterly Reports: ADECA is required to complete Quarterly Performance Reports for each calendar quarter. These reports must be submitted to HUD no later than 30 days after the end of each quarter. They will provide detailed information regarding ADECA's CDBG-DR activities. Once approved by HUD in the DRGR system, these reports will be published on ADECA's CDBG-DR website. Reporting will continue until all CDBG-DR funds are spent and programs and projects are closed out.

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 to address program income, if applicable. These amounts will be recorded and tracked in the State accounting systems and recorded in the DRGR system. Up to 5% of the program income generated by CDBG-DR funds may be used for administrative costs by ADECA.

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.

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

APPENDIX A:

Certifications

ADECA acknowledges that it will administer the CDBG-DR grant consistent with the following certifications required by Federal statute and regulation.

1) Uniform Relocation Act (URA) and Residential Anti-displacement and Relocation Plan (RARAP)—ADECA certifies that it:
   (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
   (2) has in effect and is following a 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.
2) Authority of Grantee—ADECA certifies that the Action Plan for disaster recovery is authorized under State and local law (as applicable) and that ADECA, and any entity or entities designated by ADECA, 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.
3) Consistency with the Action Plan— ADECA certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
4) Citizen Participation— ADECA 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).
5) Consultation with Local Governments – ADECA 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 ADECA.
6) Use of Funds— ADECA certifies that it is complying with each of the following criteria:
   a. **Purpose of the funding.** 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 Stafford Act (42 U.S.C. 5121 et seq.).
   b. **Maximum Feasibility Priority.** 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.
   c. **Overall benefit.** The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70% (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
   d. **Special Assessment.** ADECA 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:

i. 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

ii. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, [Grantee] certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

7) Grant Timeliness—ADECA 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 ADECA has reviewed the requirements applicable to the use of grant funds.
8) Order of Assistance—ADECA certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG–DR assistance for the costs of carrying out the same activity.
9) Affirmatively Further Fair Housing— ADECA certifies it will affirmatively further fair housing.
10) Anti-Lobbying— ADECA certifies its compliance with the restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
11) Section 3— ADECA 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.
12) Compliance with Anti-discrimination Laws— ADECA certifies 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.
13) Excessive Force— ADECA 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.
14) Compliance with Laws— ADECA certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Appendix B

Waivers

ADECA does not request any waivers as part of the initial submission of this Action Plan for Disaster Recovery but may seek waivers via independent submission of such requests at any time.

Appendix C

Public Comments

Comment Received	ADECA's Response

Appendix D

Standard Form 424

Standard Form 424 will be included in the final submission of this Action Plan to HUD.