

The State of Iowa

**ACTION PLAN FOR
DISASTER RECOVERY
2020 MIDWEST DERECHO
(DR-4557)**

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1. Executive Summary

1.1 Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Iowa will receive \$57,566,000 in funding to support long-term recovery efforts following DR 4557 Iowa Severe Storms (August 2020 Midwest Derecho) through the Iowa Economic Development Authority (IEDA). 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 the State of Iowa.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$57,566,000 in CDBG-DR funds to the State of Iowa in response to DR 4557, through the publication of the Federal Register, Vol. 87, No. 23, February 3, 2022 and Vol. 87, No. 100, May 24, 2022. This allocation was made available through Public Law 117-43.

1.2 Disaster-Specific Overview

On August 10, 2020, several widespread lines of storms known as a “derecho” produced severe wind damage across portions of South Dakota, Nebraska, Iowa, Illinois, Wisconsin, Indiana, Michigan, and Ohio. Of all the states included, the storm hit Iowa the hardest, affecting around 36 counties with severe damage. Central and Eastern Iowa experienced wind gusts of 70–80 mph, with maximum wind gusts of more than 100 mph in a few isolated areas. This event caused widespread power outages and downed trees, damaged structures, toppled semi-trailers, and flattened crops over a large area. The strongest estimated wind speeds were identified in the vicinity of Cedar Rapids, Iowa, where wind speeds peaked at about 140 mph after intensifying over Marshall, Tama, and Benton counties. The high winds were reportedly so strong that they flipped or blew some tractor-trailers off roadways, downed trees, flattened acres of agricultural crops, damaged Iowa’s grain storage capacity, shattered the power grid, and caused widespread property damage. Many people were trapped in their homes or were hurt when the storm blew in and at least four people died as a result of the storm.

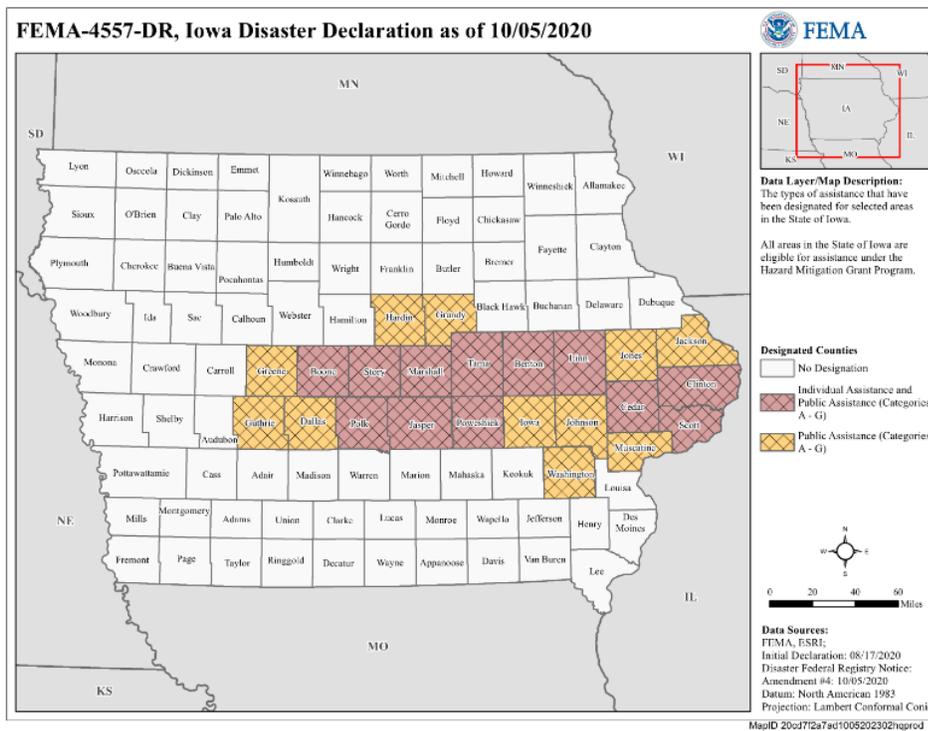
Figure 1: Path of Wind Gusts, August 2020 Midwest Derecho



On August 16, 2020, Governor Kim Reynolds requested a major disaster declaration for Individual Assistance (IA) for 27 counties, Public Assistance (PA) for 16 counties, and Hazard Mitigation statewide.¹ The disaster was presidentially declared on August 17, 2020.

Twenty-three of Iowa's 99 counties were included in the disaster declaration under DR-4557, including Benton, Boone, Cedar, Clinton, Dallas, Greene, Grundy, Guthrie, Hardin, Jackson, Jasper, Johnson, Jones, Linn, Marshall, Muscatine, Polk, Poweshiek, Scott, Story, Tama, and Washington. Based on the impacts of the disaster (see Figure 2 below), some counties received only FEMA PA and others received both FEMA PA and IA.

Figure 2: FEMA DR-4557, Iowa's Presidentially Declared Disasters by County



According to the National Oceanic and Atmospheric Administration, the [damage to Iowa](#) resulted in inflation-adjusted costs of \$12.1 billion in damages. The short-term impacts of the disaster affected housing, businesses, power supply, transportation, and the natural environment. Many homes in the State suffered some form of damage and many Iowans lost their possessions, faced food shortages, and faced power and internet outages. Because of the loss of housing and shortage of available homes after the disaster, people were pushed into unsafe living conditions (i.e., living in a temporary home or living out of their vehicles) or scrambling to buy or rent whatever was available in the housing market. In Cedar Rapids alone, more than 1,000 housing units were deemed unlivable in the week after the storm. Finding shelter was a critical need after the disaster.

¹ [FEMA-4557-DR Preliminary Damage Assessment Report](#).





Most local businesses were closed and many incurred significant damages to property, machinery and equipment, and inventory. Because of the closures, businesses sustained millions in lost revenue and unpaid wages. Fortunately, insurance has helped cover many of the losses and most businesses did not experience long-term business interruption due to the disaster.

The storm created issues with Iowa's power grid and thousands of Iowans remained without power. Days after the disaster, thousands of people were still without critical power. The lack of power affected critical needs such as telecommunications, which made it difficult for residents to communicate with each other and for public officials to communicate with the community.

The storm also made many of the roads impassable. Traffic slowed due to the severe weather and vehicle crashes. The downed trees also affected the ability of residents to navigate from one area to another. Many of the big trees in the city fell on homes, vehicles, and on public streets. Days after the storm, cities began clearing the streets of debris and removing trees damaged in the storm from the right-of-way.

The long-term impacts of the storm are still prevalent. Residents still lack access to affordable single-family homes and rental housing. More importantly, the State has seen that refugee and immigrant populations suffered heavily from the storm. These impacted groups are severely limited in their ability to attain housing. The State will look to address this issue using CDBG-DR funding. Repairs are still needed to local infrastructure and tree removal and cleanup activities remain ongoing 2 years after the storm. In addition, cities need to find solutions to addressing access to sustainable and resilient power sources during times of critical need.

HUD identified Linn County as the most impacted and distressed (MID) area and the State is proposing to include Marshall, Tama, and Benton counties as the State-identified most impacted and distressed areas. Eighty percent of funding will fund the HUD MID area and 20% will fund the State MID areas. Linn County had many of the hardest hit communities from the storm. In the county, Cedar Rapids was one of the hardest hit cities, where more than 800 buildings suffered partial collapse, and because the electrical grid was not functioning, the residents were without power for days after the storm.

In Marshall County, residents were already impacted by the 2018 tornados and were recovering, but then they were subsequently impacted by the 2020 Midwest Derecho. In Marshalltown, a city in the county, the windstorm was measured at 106 mph. The effects of both disasters are making recovery in Marshall County a slower process for residents. A lot of work has been done by the community to remove debris from the streets and downed trees that damaged housing, vehicles, and infrastructure. The State will look to speed up recovery and build resilience in the community to mitigate against future disasters.





Benton and Tama also were affected by the derecho. In Benton County, disaster recovery efforts began immediately but continued to be hampered by lack of cell phone, landline, and radio communications capabilities that lasted for days after the disaster. This situation made it complicated for local governments to provide resources to residents who needed them. In Tama County, some residents in the area were without power for days, county buildings were damaged, and tree canopies were destroyed. Almost 2 years later, these counties are still showing signs of damage.

1.3 Summary

The State of Iowa has been gathering data for the unmet needs assessment and engaging local communities since the 2020 Midwest Derecho. To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, the State has initiated consultation meetings with various county and city leaders, and nonprofit organizations. These meetings have been beneficial in gathering information about the impacts of the storm, existing challenges to address, and solutions.

To fulfill the requirements of this allocation, the State must submit an Action Plan for Disaster Recovery that identifies its unmet recovery and resilience needs to HUD. This Action Plan outlines the proposed use of the CDBG-DR funds and eligible activities available to assist impacted counties meet unmet housing, infrastructure, planning, and other needs that have resulted from the 2020 Midwest Derecho. Specifically, this plan aims to promote and ensure fair access to housing for all residents, expand sustainable homeownership opportunities for low- to moderate-income persons, and strengthen neighborhoods impacted by the disaster by investing in infrastructure.

As part of the development of the Action Plan, there are opportunities for communities to review and provide feedback on program design and comment on how the State and municipalities implement the CDBG-DR funds. The State will convene at least one public hearing in the HUD-identified MID area on the draft CDBG-DR Action Plan after being posted on its website for public comment and prior to submission to HUD. Notice of all hearings will be posted a minimum of 10 business days prior to public hearings. The State has published this draft CDBG-DR Action Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan will remain available on the IEDA website throughout the 30-day comment period.

Based on the unmet needs assessment presented in this document, the State has calculated total unmet needs of \$140,419,093 attributable to the 2020 Midwest Derecho. The State used best available data sources to perform the analyses of demographic characteristics of the areas of impact; the losses sustained; and the available resources in response to housing, infrastructure, and economic revitalization. To adequately distribute CDBG-DR funding, the State will manage a competitive process for municipalities to submit applications for funding. The State will allocate 80% to the HUD-designated MID area of Linn County and the remaining 20% to Marshall, Benton, and Tama counties.



1.4 Unmet Needs and Proposed Allocations

The table below gives losses across all categories (housing, economic development, and infrastructure) before and after adjusting for identified funding sources. The unmet needs are calculated by subtracting the resources available from the value of the total damages. The housing unmet needs number represents the impact on housing that needs to be rehabilitated, reconstructed, or newly built. This Action Plan includes new housing initiatives for both rental properties and owner properties. To increase the housing stock of the disaster-affected area, IEDA intends to initiate programs that will result in the new building of new homes and rental properties, which will serve the unmet housing needs of the public. These new homes will be capped at a sale value of \$185,000 and rents will be subject to the 65% HOME limits for the affordability period. IEDA reserves the right to increase the maximum for sale amount when the State, subrecipient and/or development team has paired, included, or otherwise made available financial resources to ensure the home is affordable to LMI households. These new housing programs, alongside the existing home rehabilitation and reconstruction programs, serve to make up the entirety of the housing unmet needs.

IEDA is allocating funds to programs to align with the need. Slight discrepancies between the need and the funding can be explained by the increased need for affordable housing and a lack of need from the community for business support. IEDA has identified existing programs and resources for Infrastructure and Economic Revitalization to supplement the recovery.

Table 1: Unmet Needs and Proposed Allocations

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Housing	\$93,108,047	66%	\$41,000,000	71%
Infrastructure	\$33,198,390	24%	\$13,687,700	24%
Economic Revitalization	\$14,112,656	10%	\$0	0%
Public Service	\$0	0%	\$0	0%
Mitigation	\$0	0%	\$0	0%
Administrative	N/A	N/A	\$2,878,300	5%
TOTAL	\$140,419,093	100%	\$57,566,000	100%

2. Unmet Needs Assessment

2.1 Overview

This section follows U.S. Department of Housing and Urban Development (HUD) requirements and details the losses and needs resulting from the 2020 Midwest Derecho, including the unmet housing, infrastructure, economic revitalization, and mitigation needs. The information collected through the unmet recovery and mitigation needs assessment process serves as the foundation





for the State’s Community Development Block Grant – Disaster Recovery (CDBG-DR) program funding and prioritization decisions.

To prepare this assessment, the Iowa Economic Development Authority (IEDA) consulted with and drew on data from the following:

- U.S. Department of Housing and Urban Development
- Federal Emergency Management Agency (FEMA)
- Small Business Administration (SBA)
- Councils of Governments (COGs)
- Local Governments

HUD has identified the most impacted and distressed (MID) area to be Linn County. As a result, Linn County will receive 80% of the CDBG-DR funding. In addition to the HUD-identified MID area, the state has identified Benton, Marshall, and Tama as MID areas to receive the remaining 20% of the CDBG-DR funding.

2.2 Housing Unmet Needs

2.2.1 Disaster Damage and Impacts

The 2020 Midwest Derecho had a significant impact on the communities in the most impacted and distressed (MID) areas. Residents either suffered extensive damage to the structure of their house or were displaced from their existing housing. Two years later and many residents, including refugees and immigrants severely impacted by the disaster, still are searching for livable and affordable housing. While the impacted areas have available housing units, the ability of low- to moderate-income (LMI) residents to access affordable housing is limited. The housing market has not kept up with the demand for affordable housing in Iowa.

The derecho affected the limited supply of affordable housing stock pre-disaster. The MID areas lost a substantial amount of affordable housing and there was an impact seen in most of the mobile home communities. Any affordable units available after the storm were quickly filled up due to the higher demand for housing. Because of the lack of housing and the lack of resources to fix their homes, some residents were forced to find substandard housing or leave their neighborhoods. There are still dilapidated structures that remain and homes that need rehabilitation.

Adequate housing is needed for the vulnerable populations, such as low income persons, elderly, disabled, refugees, immigrants, non-English speaking people, and people experiencing homelessness in the MID areas. Some of the barriers to housing people include limited housing supply, low income, limited knowledge about process, and lack of credit. To get the MID-areas to pre-disaster housing conditions, people need the funds to complete minor damages that remain on their homes, a greater diversity in housing choice, and support services that assist individuals and families who want to own a home in navigating the process to purchase homes





or find rental units. The derecho highlighted the need for more affordable housing and housing that is built to higher standards to withstand natural hazards, particularly wind events.

Affordable housing is a priority in both rural and urban areas of the State. To address the need in rural communities, IEDA recently awarded Iowa State University funding for the development of three-dimensional printed technology as a solution for constructing affordable and resilient housing in the State.² This funding is part of a larger effort to develop the rural economy, which plays an important role in the national economy. The technology could be scaled up to address needs in all parts of the State.

Age is a surrogate for many housing problems and Iowa has many problems with housing quality, with roughly 39.3% of current housing stock built before 1950.³ In addition, data from Iowa State University show that, in the impacted MID areas, the percentage of housing units built before 1940 is greater than the national average (see Table 2 below). The housing technologies and materials used for the construction of housing previously have left the existing housing stock severely outdated and not resilient to disasters such as the 2020 Midwest Derecho and future storm events. It is imperative to build more resilient and cost-effective housing that LMI residents can afford.

Table 2: Average Housing Age by Iowa MID Areas

Area	% Built Before 1940
United States	13.5
Benton	34.7
Linn	15.4
Marshall	36.5
Tama	41.2

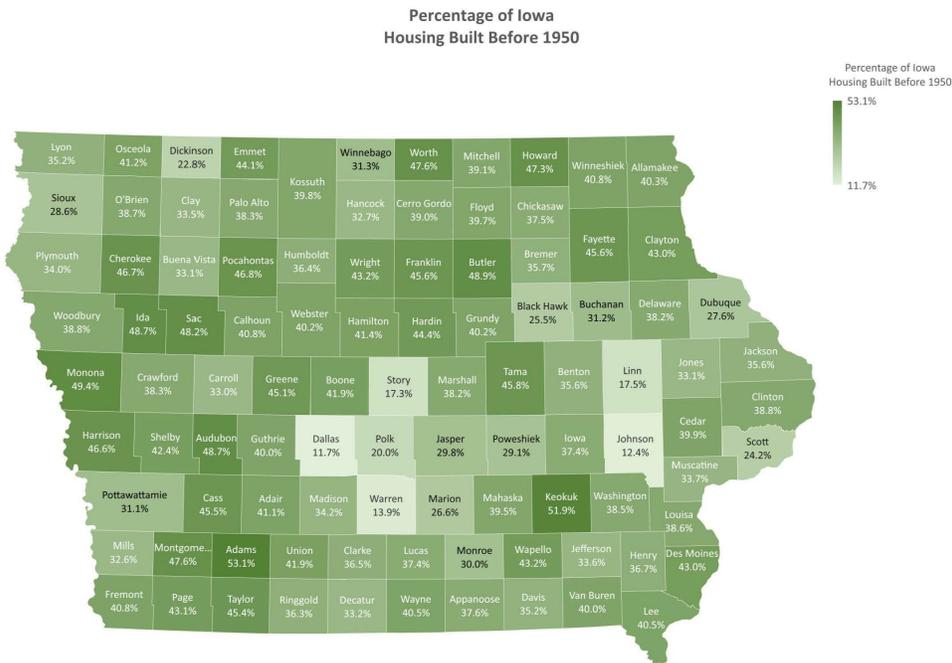
Reference: [American Community Survey Housing Age](#)

² [IEDA board approves funding through the Strategic Infrastructure Program.](#)

³ [HUD, Health and Housing Enforcement in Urban and Rural Areas of Iowa.](#)



Figure 3: Percentage of Iowa Housing Built Before 1950⁴



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2.2.2 Single-Family vs. Multifamily Needs: Owner Occupied vs. Tenant

Multifamily Rental Properties

1. Definition of Affordable Rents

IEDA is defining “affordable rents” as those rents whose limits do not exceed HUD’s 65% Fair Rent Limit determinations for the current year of application. FMRs regularly published by HUD represent the cost to rent a moderately priced dwelling unit in the local housing market. Below are the current 65% Rent Limits for the HUD and State MID counties. Note: Linn County is included in the Cedar Rapids metropolitan area.

Affordable rent limits will be adjusted when HUD updates their income limits.

⁴ [Health and Housing Enforcement in Urban and Rural Areas of Iowa.](#)





Table 3: HUD 65% Rent Limits for 2022

Metropolitan Area	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
Benton County Metro	\$1,004	\$1,077	\$1,294	\$1,487	\$1,640
Cedar Rapids Metro	\$998	\$1,070	\$1,286	\$1,477	\$1,628
Marshall County	\$879	\$943	\$1,133	\$1,300	\$1,431
Tama County	\$879	\$943	\$1,134	\$1,302	\$1,433

Reference: [FY 2022 Fair Market Rent Documentation System – Statewide Summary for Iowa \(huduser.gov\)](https://www.huduser.gov/portal/publications/2022/2022-Fair-Market-Rent-Documentation-System-Statewide-Summary-for-Iowa.pdf).

2. Income Limits

IEDA is using the HUD CDBG income limits to determine eligible CDBG-DR LMI households for affordable rental housing. Households that are 80% of the area medium income (AMI) or below are eligible to rent CDBG-DR assisted rental properties. Below are the current HUD income limits for 2022. The IEDA CDBG-DR income limits will be adjusted annually based on the HUD income limits determined for the year.

Table 4: HUD CDBG Income Limits for 2022

Benton County Metro FMR Area	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$18,900	\$21,600	\$24,300	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$31,500	\$36,000	\$40,500	\$45,000	\$48,600	\$52,200	\$55,800	\$59,400
80% AMI	\$50,400	\$57,600	\$64,800	\$72,000	\$77,800	\$83,550	\$89,300	\$95,050
Cedar Rapids FMR Area	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$18,800	\$21,450	\$24,150	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$31,300	\$35,800	\$40,250	\$44,700	\$48,300	\$51,900	\$55,450	\$59,050
80% AMI	\$50,050	\$57,200	\$64,350	\$71,500	\$77,250	\$82,950	\$88,700	\$94,400
Marshall County	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$16,600	\$18,950	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$27,650	\$31,600	\$35,550	\$39,450	\$42,650	\$45,800	\$48,950	\$52,100
80% AMI	\$44,200	\$50,500	\$56,800	\$63,100	\$68,150	\$73,200	\$78,250	\$83,300
Tama County	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$16,600	\$19,000	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$27,650	\$31,600	\$35,550	\$39,500	\$42,700	\$45,850	\$49,000	\$52,150
80% AMI	\$44,250	\$50,600	\$56,900	\$63,200	\$68,300	\$73,350	\$78,400	\$83,450

Reference: [HUD FY 2022 Income Limits Documentation System](https://www.huduser.gov/portal/publications/2022/2022-Income-Limits-Documentation-System.pdf)



3. Minimum Affordability Period

IEDA is implementing the affordability periods as prescribed in the Federal Register Notice (87 FR 6364), requiring the CDBG-DR funds to follow the HOME federal funding requirements for affordability. For multifamily rental housing, HUD requires following 92 CFR 252(e)(1). See the requirements below.

(e) *Periods of affordability.* The HOME-assisted units must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion.

(1) The affordability requirements:

- (i)** Apply without regard to the term of any loan or mortgage, repayment of the HOME investment, or the transfer of ownership;
- (ii)** Must be imposed by a deed restriction, a covenant running with the land, an agreement restricting the use of the property, or other mechanisms approved by HUD and must give the participating jurisdiction the right to require specific performance (except that the participating jurisdiction may provide that the affordability restrictions may terminate upon foreclosure or transfer in lieu of foreclosure); and
- (iii)** Must be recorded in accordance with State recordation laws.

Table 5: HOME Affordability Requirements for CDBG-DR (24 CFR 92.252(e)(1))

Rental Activity CDBG-DR Amount per Unit	Minimum Period of Affordability in Years
Rehabilitation or acquisition of existing housing per unit amount of CDBG-DR funds: Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000 or rehabilitation involving refinancing	15
New construction or acquisition of newly constructed housing (five units or more)	20

Single-Family New Construction

IEDA is implementing the affordability periods as prescribed in the Federal Register Notice (87 FR 6364) requiring the CDBG-DR funds to follow the HOME federal funding requirements for affordability. For single-family homeownership and single-family rental new construction, HUD requires following 92 CFR 254(a)(4).





See the requirements below.

Homeownership Assistance CDBG-DR Amount per Unit	Minimum Period of Affordability in Years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

Resale/Recapture Requirements for Single-Family New Housing Construction

IEDA is establishing resale/recapture requirements for direct CDBG-DR homebuyer assistance. The Federal Register Notice allocating the 2020 CDBG-DR funds state the following:

Grantees shall establish resale or recapture requirements for housing funded pursuant to this paragraph and **shall describe those requirements in the Action Plan** or substantial amendment in which the activity is proposed. The resale or recapture requirements must clearly describe the terms of resale or recapture and the specific circumstances under which resale or recapture will be used.

Recapture or Resale Provisions (Homeownership Activities)

IEDA will invest 2020 CDBG-DR resources to benefit qualified low-income homebuyers through direct acquisition assistance and new construction/sale of single-family housing when appropriate to further the State’s housing goals. In accordance with the applicable homebuyer recapture/resale provision outlined in 24 CFR Part 92.254, IEDA has adopted the recapture provision for its 2020 CDBG-DR assisted homeownership projects.

All subrecipients who administer homebuyer programs will follow recapture provisions that have been adopted by IEDA. The recapture provision is enforced through execution of covenants and restrictions recorded at closing, which identify the period of affordability, primary residency requirement, and terms and conditions required when using the recapture provision. These provisions also will be detailed in a written agreement executed at closing between the homebuyer and the subrecipient to ensure that the homebuyer is made fully aware of the compliance requirements associated with the use of 2020 CDBG-DR assistance.

A mortgage secured through a receding forgivable loan will be recorded at the time of closing for the amount of direct subsidy that enabled the homebuyer to purchase the property. This direct subsidy includes down payment assistance, closing costs, or other CDBG-DR assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and the purchase price.

In the event that a homeowner unit that is assisted with IEDA 2020 CDBG-DR Homeowner Program is sold, conveyed, or otherwise transferred during the affordability period, the total amount of the 2020 CDBG-DR investment for the homeownership unit will be recaptured out of the available net proceeds. The recapture provision will ensure that each 2020 CDBG-DR





assisted unit will remain affordable for a period of time determined by the preceding affordability schedule, established in accordance with 24 CFR 92.254(a)(4).

Homebuyer Compliance

Subrecipients are required to track and report to IEDA if recapture or resale activity impacts any 2020 CDBG-DR assisted unit. The subrecipient also is responsible for verifying annually that the assisted homebuyer is maintaining the home as the principal residence. A “principal residence verification” report will be submitted upon request to IEDA compliance staff.

Definition of Affordable Housing

IEDA will use the HUD definition of “affordable housing” below:

Affordable Housing: Affordable housing is generally defined as housing on which the occupant is paying no more than 30% of gross income for housing costs, including utilities. Reference: <https://archives.hud.gov/local/nv/goodstories/2006-04-06glos.cfm>.

Income Limits

IEDA is using the HUD CDBG income limits to determine eligible CDBG-DR LMI households for affordable new housing. Households that are 80% of the AMI or below are eligible to purchase CDBG-DR assisted new single-family affordable housing units. Below are the current HUD income limits for 2022. The IEDA CDBG-DR income limits will be adjusted annually based on the HUD income limits determined for the year.

Table 6: HUD CDBG Income Limits for 2022

Benton County Metro FMR Area	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$18,900	\$21,600	\$24,300	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$31,500	\$36,000	\$40,500	\$45,000	\$48,600	\$52,200	\$55,800	\$59,400
80% AMI	\$50,400	\$57,600	\$64,800	\$72,000	\$77,800	\$83,550	\$89,300	\$95,050
Cedar Rapids FMR Area	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$18,800	\$21,450	\$24,150	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$31,300	\$35,800	\$40,250	\$44,700	\$48,300	\$51,900	\$55,450	\$59,050
80% AMI	\$50,050	\$57,200	\$64,350	\$71,500	\$77,250	\$82,950	\$88,700	\$94,400
Marshall County	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$16,600	\$18,950	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$27,650	\$31,600	\$35,550	\$39,450	\$42,650	\$45,800	\$48,950	\$52,100
80% AMI	\$44,200	\$50,500	\$56,800	\$63,100	\$68,150	\$73,200	\$78,250	\$83,300





Tama County	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
30% AMI	\$16,600	\$19,000	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
50% AMI	\$27,650	\$31,600	\$35,550	\$39,500	\$42,700	\$45,850	\$49,000	\$52,150
80% AMI	\$44,250	\$50,600	\$56,900	\$63,200	\$68,300	\$73,350	\$78,400	\$83,450

Reference: [HUD FY 2022 Income Limits Documentation System](#)

2.2.2.1 FEMA Individual Assistance (IA) Owner Occupied

Table 7: FEMA IA Owner Occupied

County	No. of Applicants	No. of Inspections	No. of Inspections with Damage	No. Received IHP ⁵	Total FEMA Verified Loss	Average FEMA Verified Loss
Benton	504	92	69	46	\$446,946.94	\$886.80
Boone	273	52	43	22	\$300,060.61	\$1,099.12
Cedar	163	28	15	9	\$132,612.48	\$813.57
Clinton	276	55	39	29	\$171,202.45	\$620.30
Jasper	450	104	83	49	\$508,333.62	\$1,129.63
Linn	6,326	1,200	958	634	\$5,581,569.82	\$882.32
Marshall	865	184	158	101	\$1,068,333.84	\$1,235.07
Polk	1,028	270	190	100	\$1,309,959.93	\$1,274.28
Poweshiek	140	21	16	11	\$132,330.73	\$945.22
Scott	784	134	94	55	\$501,077.81	\$639.13
Story	417	72	53	38	\$366,828.13	\$879.68
Tama	347	62	54	31	\$396,203.39	\$1,141.80
TOTAL	11,573	2,274	1,772	1,125	\$10,915,459.75	\$943.18

Reference: [FEMA Individual Assistance Dataset April 2022](#)

⁵ FEMA IHP: Individuals and Households Program



2.2.2.2 FEMA IA Tenant Applicants

Table 8: FEMA IA Tenant Applicants

County	No. of Applicants	No. of Inspections	No. Inspected with Damage	No. Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Benton	190	75	46	42	\$94,023.95	\$494.86
Boone	88	38	18	5	\$37,171.25	\$422.40
Cedar	174	108	70	28	\$189,743.37	\$1,090.48
Clinton	248	43	24	17	\$68,182.13	\$274.93
Jasper	442	118	63	29	\$109,707.00	\$248.21
Linn	6,147	3,368	2,333	1,554	\$5,782,114.81	\$940.64
Marshall	329	134	74	47	\$166,588.21	\$506.35
Polk	901	337	171	93	\$386,698.41	\$429.19
Poweshiek	59	23	15	7	\$29,442.54	\$499.03
Scott	809	301	190	125	\$354,842.03	\$438.62
Story	164	43	23	11	\$53,233.05	\$324.59
Tama	104	26	13	9	\$23,536.48	\$226.31
TOTAL	9,655	4,614	3,040	1,967	\$7,295,283.23	\$755.60

Reference: [FEMA Individual Assistance Dataset April 2022](#)

2.2.2.3 FEMA IA Applications by Housing Type

Table 9: FEMA IA Applications by Housing Type

Residence Type	No. of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	4,058	0.05%	99.90%	0.05%	19.11%
Assisted Living Facility	15	0.00%	100.00%	0.00%	0.07%
Boat	3	33.33%	66.67%	0.00%	0.01%
Condo	232	61.64%	38.36%	0.00%	1.09%
Correctional Facility	2	0.00%	100.00%	0.00%	0.01%
House/Duplex	14,347	68.56%	31.43%	0.01%	67.56%
Military Housing	3	0.00%	100.00%	0.00%	0.01%
Mobile Home	1,424	84.90%	14.96%	0.14%	6.71%
Other	518	51.54%	48.07%	0.39%	2.44%
Townhouse	588	14.29%	85.71%	0.00%	2.77%
Travel Trailer	46	67.39%	32.61%	0.00%	0.22%

Reference: [FEMA Individual Assistance Dataset April 2022](#)

2.2.2.4 FEMA Real Property Damage – Owner-Occupied Units



Table 10: 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
Benton	19	39	5	4	2
Boone	14	20	8	1	0
Cedar	1	10	4	0	0
Clinton	18	19	1	1	0
Jasper	32	35	11	5	0
Linn	332	471	104	49	2
Marshall	51	75	25	7	0
Polk	59	89	33	9	0
Poweshiek	4	7	4	1	0
Scott	40	43	10	1	0
Story	19	20	9	5	0
Tama	14	26	11	3	0
TOTAL	603	854	225	86	4

Reference: [FEMA Individual Assistance Dataset April 2022](#)

2.2.2.5 FEMA Real Property Damage – Rental Units

Table 11: FEMA Real Property Damage – Rental Units

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Benton	17	10	9	10	0
Boone	6	4	3	5	0
Cedar	21	13	12	18	6
Clinton	5	3	5	9	2
Jasper	29	12	9	12	0
Linn	731	507	523	485	86
Marshall	24	19	7	21	3
Polk	60	33	31	43	4
Poweshiek	5	4	3	3	0
Scott	76	59	26	26	3
Story	7	8	5	3	0
Tama	8	0	2	3	0
TOTAL	989	672	635	638	104

Reference: [FEMA Individual Assistance Dataset April 2022](#)



2.2.3 Public Housing and Affordable Housing

IEDA intends to construct new multifamily housing as part of this Action Plan through the New Rental Housing Program. See additional program details in [Section 4](#).

2.2.3.1 Multifamily HUD-Assisted Housing

Table 12: Multifamily HUD-Assisted Housing

Type of Damage	No. of Properties	No. of Units	No. of Units Assisted	No. of Units Waiting Assistance
Benton	2	72	72	0
Boone	3	141	34	107
Clarke	1	170	0	170
Clinton	3	109	58	51
Dallas	3	603	0	603
Jackson	2	78	78	0
Jasper	5	248	197	51
Johnson	2	160	0	160
Linn	18	1,241	1,114	127
Marshall	2	122	70	52
Polk	18	1,755	804	951
Poweshiek	2	68	68	0
Scott	13	1,754	529	1,225
Story	4	276	231	45

Reference: [HUD Field Policy and Management Report September 09, 2020](#)

2.2.3.2 Public Housing Authorities (PHAs) Damaged

Table 13: Public Housing Authorities (PHAs) Damaged

County	Total No. of PHAs	Total PHAs Damaged	No. of Units Damaged
Linn	1	1	17
Total	1	1	17

Reference: [HUD Public and Indian Housing Situation Report for September 08, 2020](#)

2.2.3.3 Owner with Unmet Needs in a Floodplain

Data not available based on number of individuals without flood insurance. The 2020 Midwest Derecho was not a flooding event.



2.2.3.4 Insurance Claims and Losses in Disaster-Impacted Areas

Data not available based on number of claims resulting in loss.

2.2.3.5 Total Home Loans Approved by SBA

Table 14: Total Home Loans Approved by SBA

County	No. of Home Loans
Benton	45
Boone	27
Cedar	9
Clinton	10
Iowa	2
Jasper	19
Linn	556
Marshall	39
Polk	53
Poweshiek	9
Scott	39
Story	22
Tama	26
TOTAL	856

Reference: [SBA Disaster Loan Statistics Report for February 22, 2022](#)

2.2.4 Social Equity, Fair Housing, and Civil Rights

Section 109 of Title I of the Housing and Community Development Act of 1974 prohibits discrimination on the basis of race, color, national origin, sex, or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program. The Affirmatively Furthering Fair Housing (AFFH) goals described in [HUD's Fair Housing Planning Guide](#) the goals that grantees should try to meet. They include:

1. Analyze and eliminate housing discrimination in the jurisdiction
2. Promote fair housing choice for all persons
3. Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin
4. Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities
5. Foster compliance with the nondiscrimination provisions of the Fair Housing Act





CDBG grantees are responsible for ensuring that all housing assisted with CDBG funds is made available on a non-discriminatory basis: that is, without regard to race, color, religion, sex, disability, familial status, age, or national origin. Discriminatory housing practices might include any action in which an individual or class of individuals in a specific protected class is treated differently than others who are not in that protected class, when the result of that action denies that individual or class of individuals equal access to or benefit of a housing opportunity.

The State of Iowa is focused on supporting efforts to affirmatively further fair housing. As part of their 2018 analysis of impediments to fair housing in response to changing HUD rules, Iowa identified what factors were contributing to fair housing issues, areas having racial and ethnic concentrations of poverty, and limiting access to opportunity⁶. Iowa's vulnerable populations and protected classes could face the following barriers:

- Access to affordable housing for persons with disabilities. The insufficient inventory of affordable housing exacerbates the problem of addressing housing needs for persons with disabilities. CDBG-DR programs will look to provide incentives to encourage the construction of more visitable units in multi-family housing and ensure multi-family developments are built to the required accessibility design standard. IEDA is working to address this impediment through 2020 CDBG-DR by proposing two programs for the new construction of affordable, resilient housing. One program will be for rental housing (1-4 unit single-family and 5+ unit multi-family housing) and the other program will be for for-sale single-family (1-4 units) housing.
- Access to home ownership for low- and moderate- income persons. As per the study of impediments, racial and ethnical minorities, families with children, persons with disabilities, foreign-born residents, and other protected classes tend to have higher rates of cost burdens, various housing needs, have insufficient understanding of credit, and are more likely to live in poverty that can inhibit their ability to meet their housing needs. Solutions to this problem include providing individuals and families with access to low interest loans, providing financial counseling, and promoting the development of affordable housing units in key areas. IEDA is working to address this impediment through 2020 CDBG-DR by requiring applicant cities, counties, and tribes for the new housing programs to provide a Fair Housing Plan, which will outline their steps to comply with mandatory and elective Fair Housing activities and describe their outreach efforts to protected classes, including but not limited to:
 - Performing outreach and engagement to understand the needs of impacted residents
 - Creating a personalized recovery plan (during the application stage) that addresses the needs of the local community
 - Coordinating with government agencies and developers

⁶ [2018 State of Iowa Analysis of Impediments to Fair Housing Choice](#)





- Coordinating with local organizations to ensure that protected classes (including but not limited to refugee and immigrant populations) are aware of the assistance and can access it
- Coordinating with local nonprofit organizations that provide services to people experiencing homelessness, people with disabilities, and historically underserved populations to ensure the promotion of the program and help remove their barriers to accessing the assistance
- Completing a Language Access Plan and identifying language access needs for the community.

IEDA is also working to promote the development of affordable housing in key areas. Newly constructed units will be located close to amenities such as walking & biking trails, parks, open space, and public transit (if located within an urban area). No housing projects will be awarded within the 100-year floodplain. Projects located close to services and community amenities will be scored higher. These include full service grocery stores; gyms, community pools, public library, schools, emergency shelter, clothing stores, hardware stores, childcare, etc. See the 2020 Iowa Green Streets Criteria 2.5 Proximity to Services and Community Resources for more information.

- Limited Housing Choice. Because of lower incomes for members of protected classes, there is a gap between homes that are affordable for white households and those that are affordable to non-white households. Preserving the existing affordable housing inventory through the rental rehabilitation program and investing in new affordable housing will address this barrier. IEDA is working to address this impediment through two of its 2020 CDBG-DR programs. The owner-occupied rehabilitation program will assist low to moderate income households with repairs to their homes incurred by, or as a result of, the disaster event. The new construction of affordable rental and for-sale housing will also help to promote affordable housing opportunities.
- More Fair Housing Education, Outreach, and Enforcement. As the population continues to diversify, the need for fair housing services will also increase. Vulnerable populations and protected classes need to be made aware of discriminatory behaviors that are illegal and what recourse they have to address actions preventing them from meeting their housing needs. IEDA is working to address this impediment through providing all subrecipients and beneficiaries of funds with a contractor fraud checklist as prepared by the Iowa Attorney General. This checklist will outline signs of contractor fraud and how to report contractor fraud to the proper authorities. The Fair Housing Plans as prepared by the applicant cities, counties, and tribes will also describe how the subrecipients intend to remove barriers to assistance, including discriminatory behaviors to persons of protected classes, and what recourses discriminated individuals have to address actions preventing them from meeting their housing needs.





Both the Iowa Economic Development Authority and Iowa Finance Authority certified that they will affirmatively further fair housing by taking appropriate actions to overcome the effects of these factors.

To meet the civil rights requirements, as part of the Action Plan development, IEDA has identified which populations are vulnerable and historically underserved. IEDA met with several communities that have substantial immigrant and refugee residents that were impacted by the 2020 Midwest Derecho. Many residents have faced discrimination, continued issues with landlords, issues with FEMA, difficult developers, and lack of financial support resulting in many leaving their communities. Residents in other protected classes (race, color, national origin, religion, sex, their familial status, and disability) and racially and ethnically concentrated areas may have faced similar unjustified discriminatory practices. As shown later in this plan, IEDA has identified to the extent possible where these populations are and using the latest Analysis of Impediments, IEDA will make sure that subrecipients are addressing the needs of these impacted populations.

IEDA will look to leverage existing local funds and coordinate on services that provide low-income individuals and families with children, elderly persons, persons with disabilities, and victims of domestic violence with the financial and legal support to facilitate the participation in the CDBG-DR housing programs, address housing needs, and prevent them from becoming homeless. IEDA will encourage subrecipients to:

1. Provide residents with tools to understand homeownership and renting guidelines and the process before housing is built as well as providing counseling on financial literacy. The application will require subrecipients explain how they intend to engage with immigrant and refugee populations. When needed, IEDA will also provide subrecipients with referrals to organizations that specialize in providing these services.
2. Ensure that public documents target specific language translations such that affected communities are able to understand the support that the CDBG-DR programs aim to provide.
3. Uphold the minimum units for accessibility under the Americans with Disabilities Act of 1990 (ADA) rules and align design requirements with the Iowa Green Streets Criteria.
4. Utilize existing or develop relationship with applicable Continuum of Care organizations to ensure that progress is made on addressing housing needs and preventing homelessness.

To address the special needs of persons who are not experiencing homelessness but require supportive housing, IEDA will promote existing resources that are available through the Iowa Finance Authority Homelessness Program and the Habitat for Humanity of Iowa. Individuals experiencing homelessness or are at-risk of becoming homeless can be assisted by [local organizations](#). These housing organizations provide a network of housing support services to at-risk individuals which include:





- Provide low income rental housing and new home construction
- Provide household goods and building materials
- Provide short and long term housing for people recovering from substance abuse
- Provide transitional housing for women without children
- Provide financial assistance for necessary services such as rent and utilities in an emergency
- Provide loans, grants, and loan guarantees for individuals and businesses to assist with affordable housing

For individuals already experiencing homelessness in Linn County, the existing [Iowa PATH](#) (Projects for Assistance in Transition from Homelessness) program funded by the Substance Abuse and Mental Health Administration (SAMHSA) works with adults who are homeless and live with mental illness, substance abuse, and trauma. The program helps individuals obtain permanent supportive housing, transitional housing, or emergency shelter.

The CDBG-DR housing programs listed in this Action Plan will allow IEDA to take action in increasing the stock of affordable housing for impacted residents. The housing programs will be implemented to ensure vulnerable populations can access opportunities for funding. Each applicant will be required to have a Fair Housing plan as part of their proposal, IEDA will evaluate the maximum awards on case by case basis, and IEDA will monitor the efforts subrecipients are making towards furthering fair housing.

- During Application Process: IEDA will encourage subrecipients to provide documentation that they can comply with fair housing requirements early in the process. In addition, IEDA will frequently reach out to subrecipients on the development of programs, encourage subrecipients to provide translation based on their LAP guidelines, require subrecipients to partner with non-profits to work on outreach, review the number of and method of engagements (word of mouth, public notifications, meetings, workshops) to vulnerable/impacted communities and protected classes, and utilize existing processes developed by the [Iowa's Civil Rights Commission](#) (ICRC) to ensure compliance.
- Monitoring Process: IEDA will maintain documentation on how subrecipients addressed AFFH by requiring subrecipients to submit documentation on the number of outreach efforts conducted and provide data on program accomplishments. Based on the review, IEDA may provide technical assistance when specific programs are not equitably serving vulnerable and marginalized groups. The assistance will determine if subrecipients have completed their own Analysis of Impediments and whether subrecipients have records documenting their AIs and the actions taken to remedy or ameliorate impediments to fair housing choice in the local government's community.





There are many socially vulnerable populations in Benton, Linn, Marshall, and Tama counties based on several key indicators. Using HUD’s LMI calculations, the Centers for Disease Control and Prevention (CDC) and the Agency for Toxic Substances and Disease Registry (ATSDR) Social Vulnerability Index (SVI), and the U.S. Environmental Protection Agency’s (EPA) EJScreen, an examination of the data reveals that there are a large number of disadvantaged residents in all four counties.

HUD’s LMI calculations demonstrate the percentage of residents that are at or below 80% of the AMI based on 2011–2015 American Community Survey (ACS) estimates. In Benton County, 37.51% of residents are at or below 80% of the AMI; in Linn County, 39.41% of residents live at or below the AMI; in Marshall County, 40.83% of residents live at or below the AMI; and in Tama County, 35.98% of residents live at or below the AMI. See Table 15 and Figure 4 for an LMI county-level estimate and map.

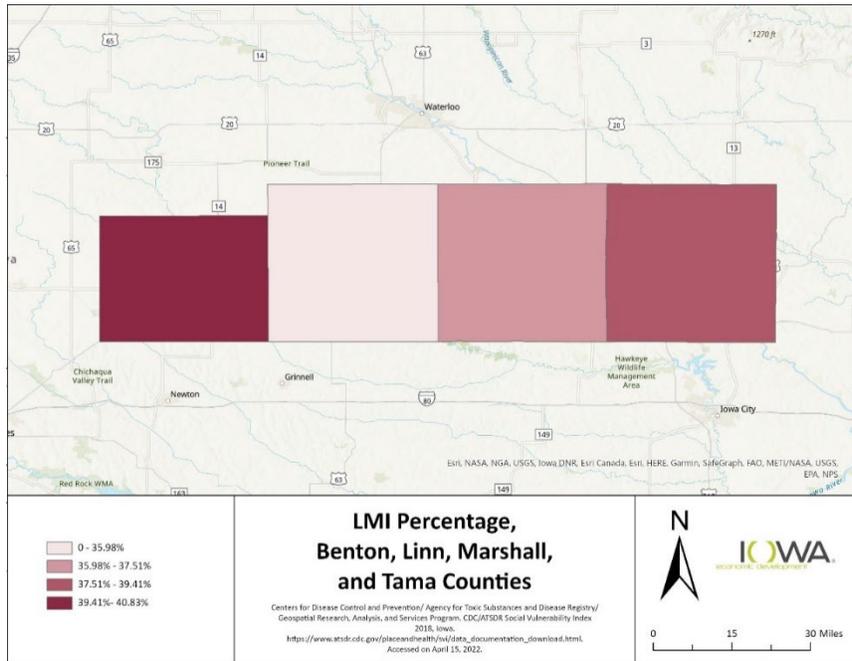
Table 15: County-Level LMI Average – Benton, Linn, Marshall, and Tama Counties

County Total	Number of Residents at or Below 80% of the AMI	Percentage of Residents at or Below 80% of the AMI
Benton County	9,553	37.51%
Linn County	83,409	39.41%
Marshall County	16,269	40.83%
Tama County	6,145	35.98%

Reference: [FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data - HUD Exchange](#)



Figure 4: LMI Percentage – Benton, Linn, Marshall, and Tama Counties



ing the Climate Crisis at the overall benefits” of ntaged communities. This is and adaptation largely agencies and covered et populations with the CDC’s

nton, Linn, Marshall, and ation of residents that identify ties and tracts on 15 social d further groups them into emes are Socioeconomic guage, and Housing Type & ive vulnerability of a given l support to recover following le ranking calculation that

represents the proportion of tracts that are equal to or lower than a tract of interest in terms of social vulnerability. For example, a CDC/ATSDR SVI ranking of 0.60 signifies that 60% of tracts in the State or nation are less vulnerable than the tract of interest and that 40% of tracts in the State or nation are more vulnerable.

Forty-four percent of census tracts in Benton, Linn, Marshall, and Tama counties have an SVI percentile of 0.5. Nearly 31% of census tracts in the four counties have a poverty rate above the national average of 11.6%. The average percentile for tracts in Benton County is 0.03; in Linn County, 0.43; in Marshall County, 0.95; and in Tama County, 0.73. See Table 16 and Figure 5 for SVI percentiles and relevant demographic data.

Table 16. SVI Data – Benton, Linn, Marshall, and Tama Counties

Location	Total Population	Percentage of Residents Living in Poverty	Percentage of Disabled Residents	Percentage of Residents Who Are Single Parents	Percentage Minority	Percentage of Residents with Limited English Proficiency	Overall SVI Percentile
Benton County	25,626	9.2%	11.2%	6.9%	3.5%	0.3%	0.03%
Linn County	222,121	9.5%	10.1%	8.8%	13.6%	1%	0.43%
Marshall County	40,271	10.9%	11.9%	8.8%	28.3%	7.7%	0.95%
Tama County	17,136	12.1%	11.4%	8.3%	18.5%	2.4%	0.73%

Reference: [CDC/ATSDR Social Vulnerability Index](#)



Figure 5. SVI Comparison Across Benton, Linn, Marshall, and Tama Counties

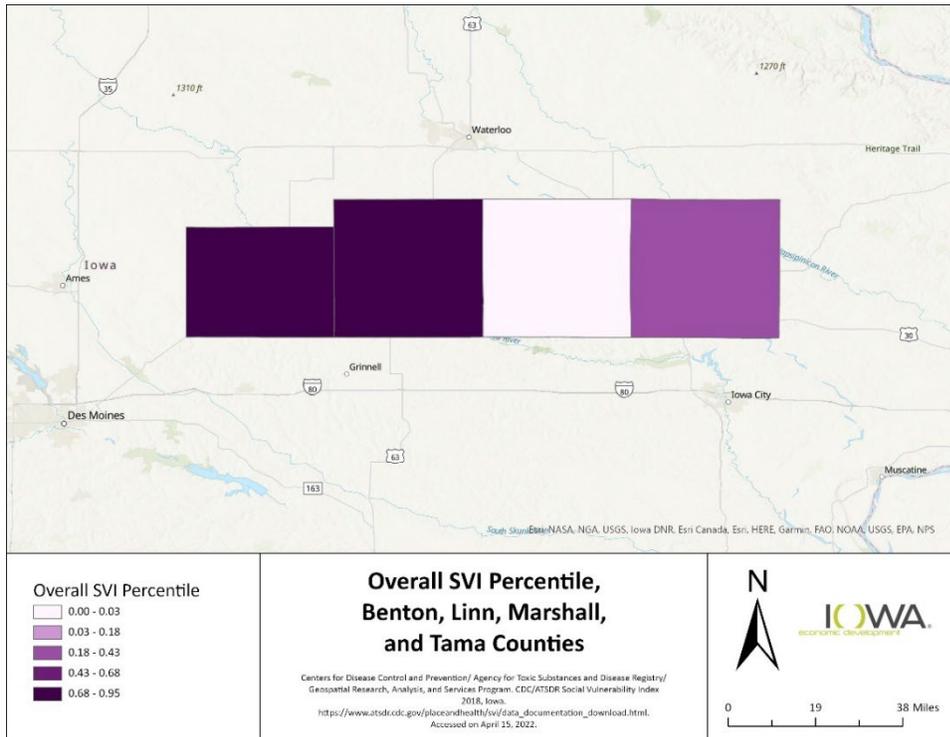
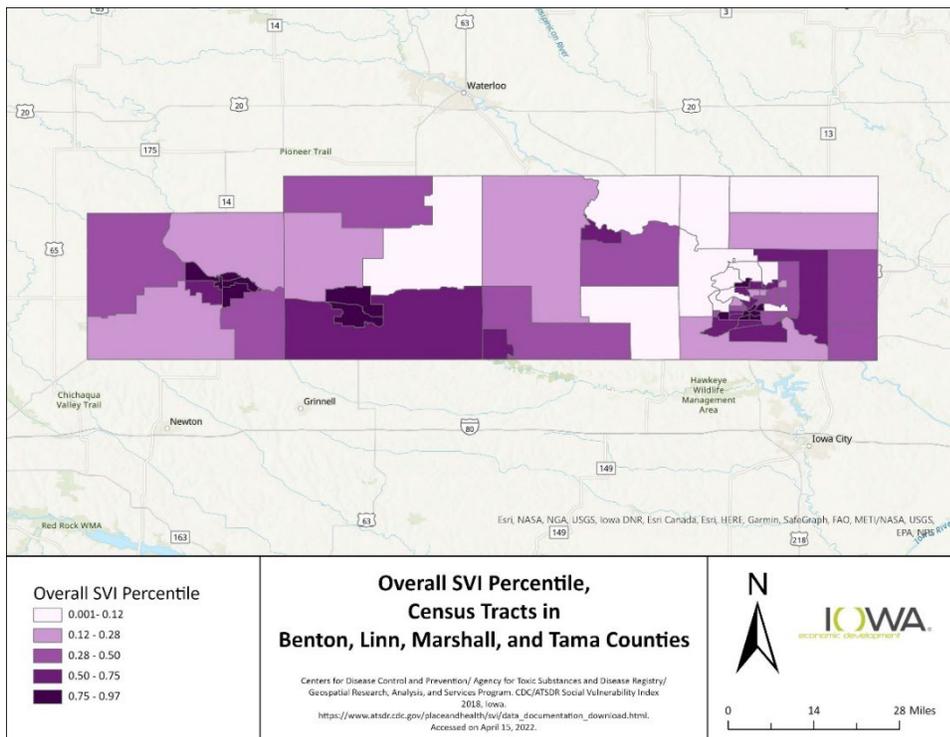
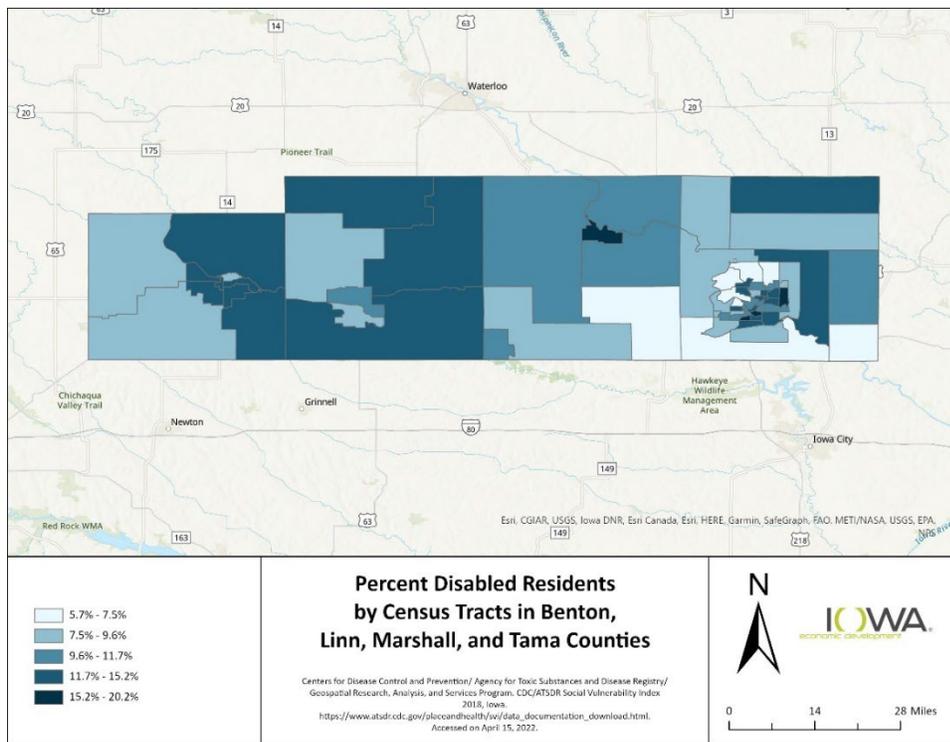
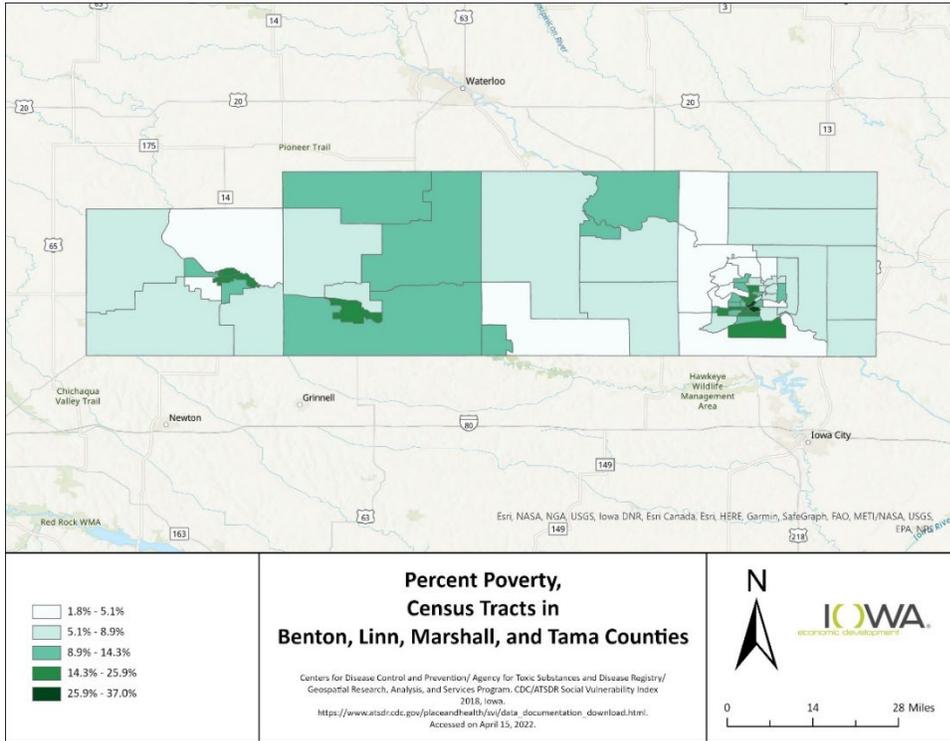


Figure 6. SVI Census Tract Maps – Benton, Linn, Marshall, and Tama Counties





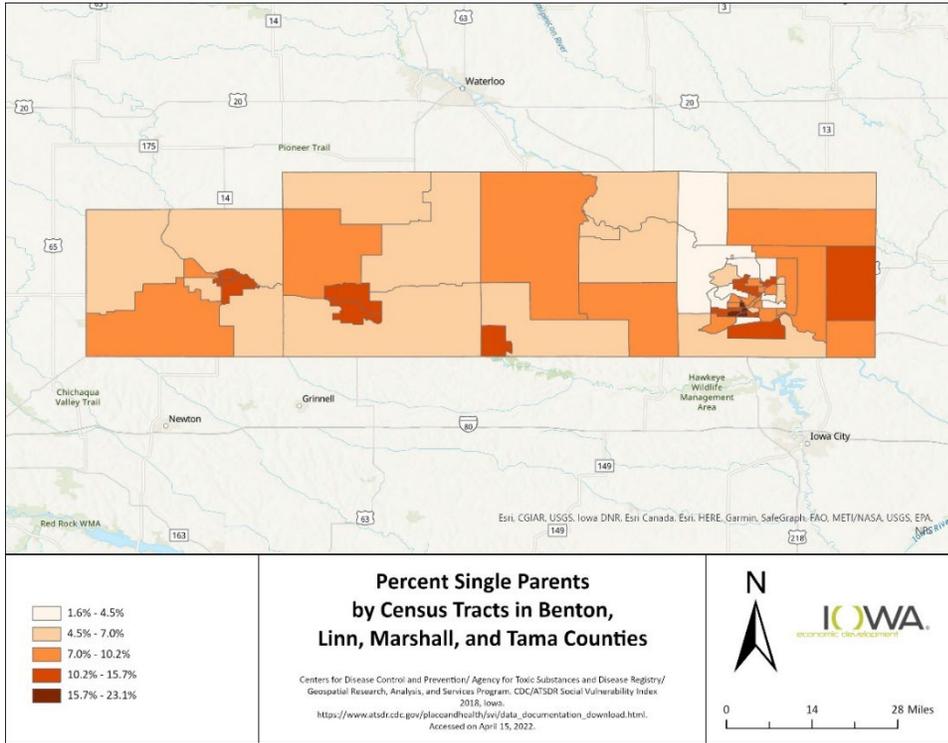
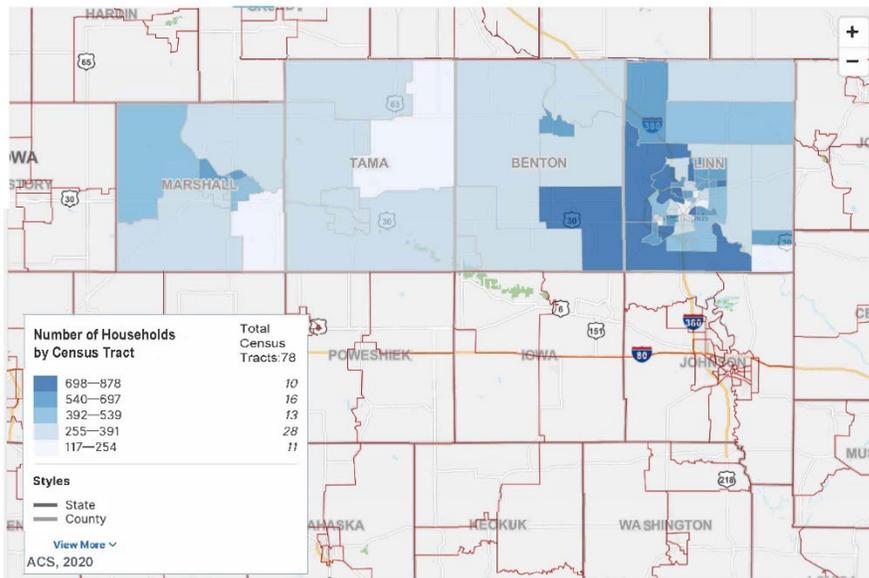


Figure XX. Percentage of Persons by Household Category & Familial Status

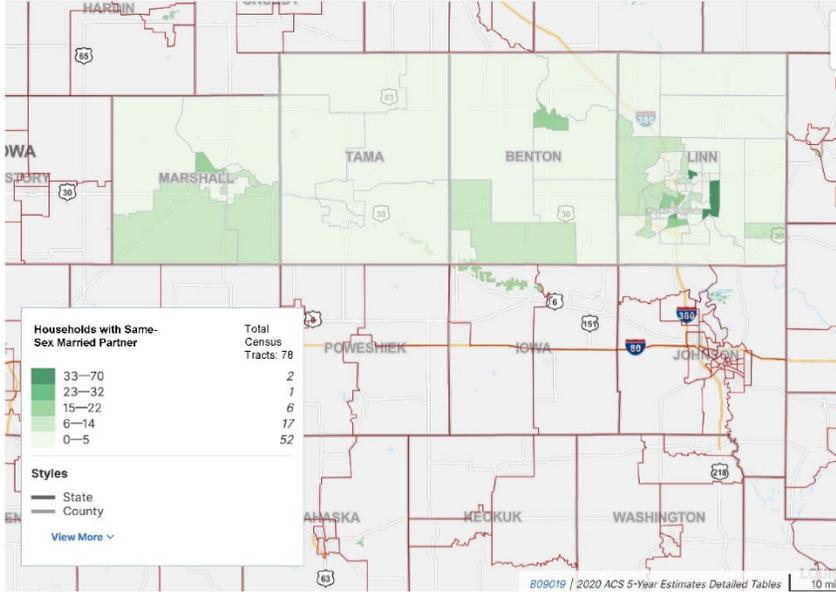
The following maps show the percentage of persons belonging to Federally protected classes under the Fair Housing Act by familial status in the HUD and State-identified MID areas (Benton, Linn, Marshall, and Tama Counties). The data is sourced from the American Community Survey (2020).

Households with Children Under the Age of 18



Households with Same-Sex Married Partner

2020 : ACS 5-Year Estimates Detailed Tables



Households with Same-Sex Unmarried Partner

2020 : ACS 5-Year Estimates Detailed Tables

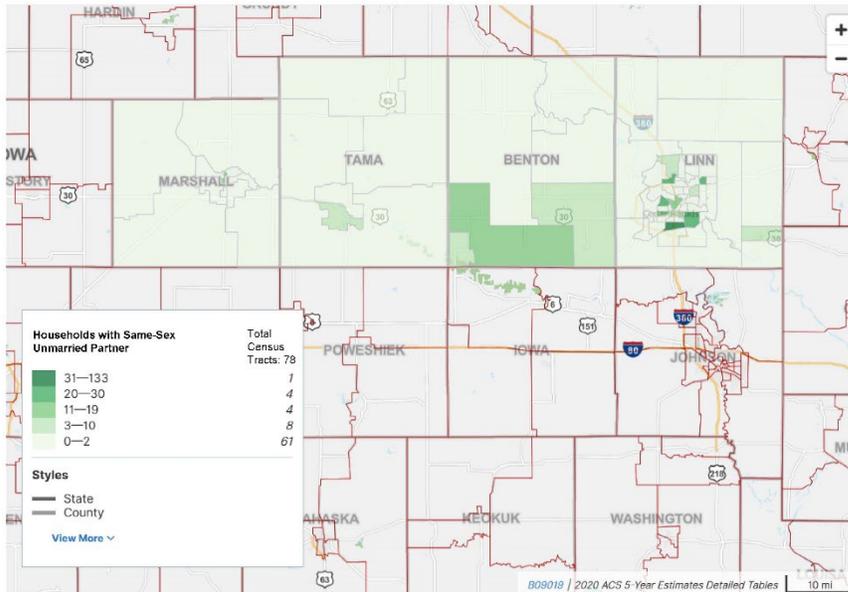


Table XX. Percentage of Persons by Religious Affiliation

The Iowa population is majority Christian, with a smaller subset that is unaffiliated. Below is a map from a 2020 survey on American Religions conducted by the [Public Religion Research Institute](#)





(PRRI). The table below shows the proportion of people in each county identifying with different religious affiliation categories. The data displayed below is not inclusive of all religious categories. More details about the data can be found on Public Religion Research Institute's [website](#).

Location	Total Population	Percentage of White Christian Identity	Percentage of White Catholic Identity	Percentage of Hispanic Catholic Identity	Percentage of Black Protestant Identity	Percentage of Religiously Unaffiliated Identity
Benton County	26,000	69%	11%	2%	1%	25%
Linn County	227,000	63%	17%	2%	1%	28%
Marshall County	39,000	64%	14%	8%	0%	24%
Tama County	17,000	69%	15%	1%	0%	26%



2.2.4.1 Racially/Ethnically-Concentrated Areas of Poverty (R/ECAPs)

Racially/ethnically-concentrated areas of poverty (R/ECAPs) are census tracts determined by HUD to have a non-white population of 50% or more and where more than 40% of the population lives in poverty. As shown below in the figure, none of the HUD or State-identified MID areas have R/ECAP areas.

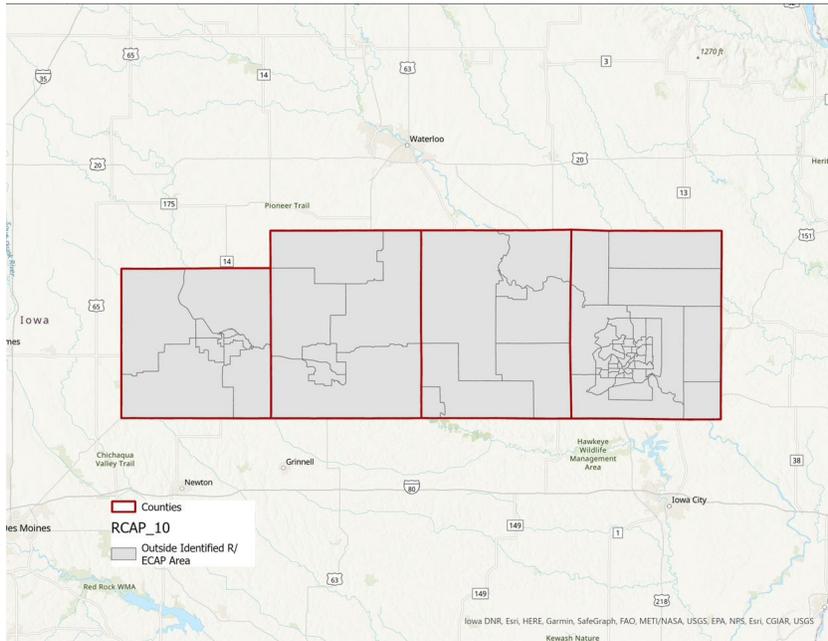
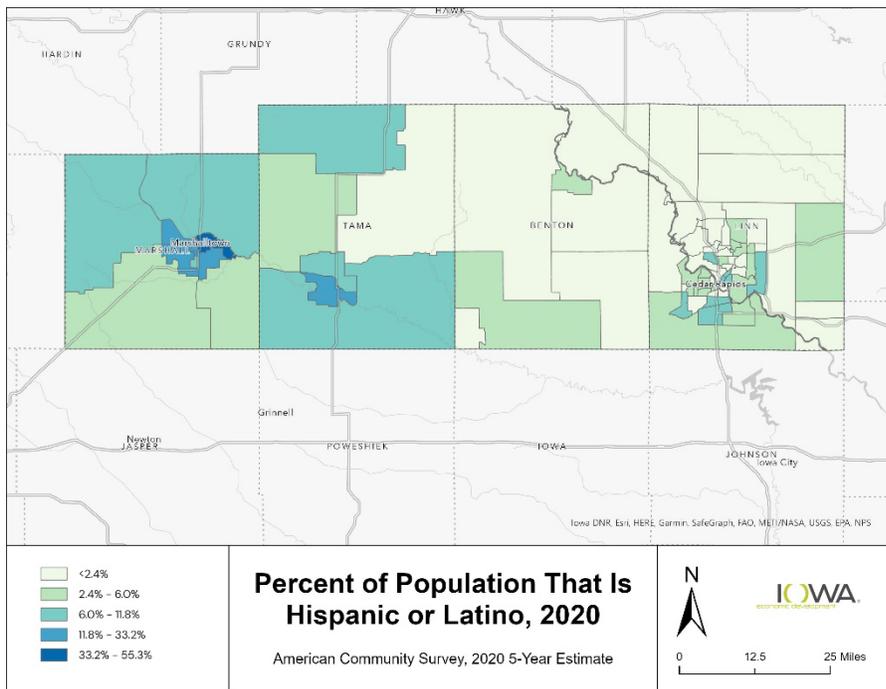
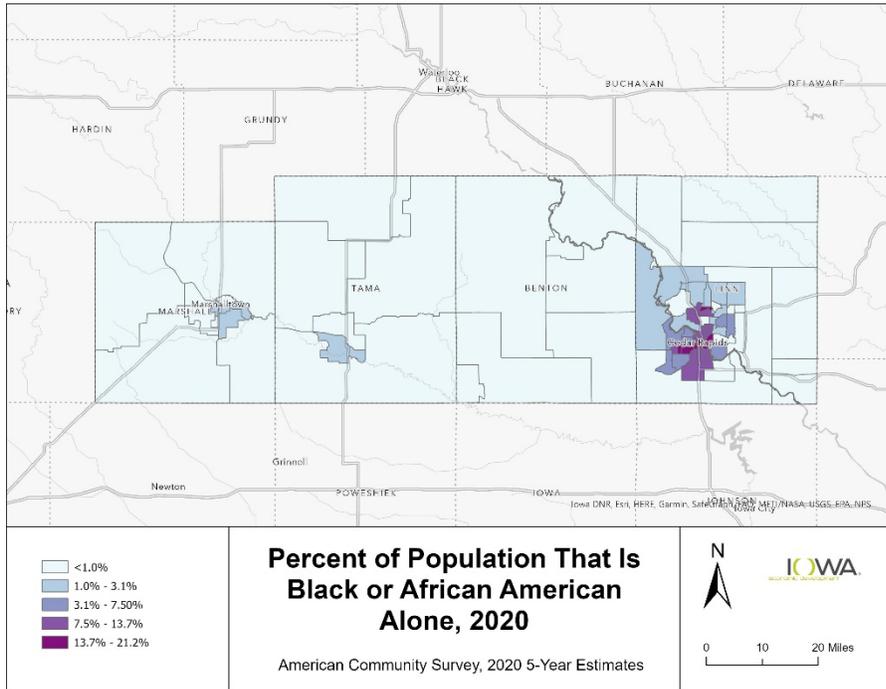
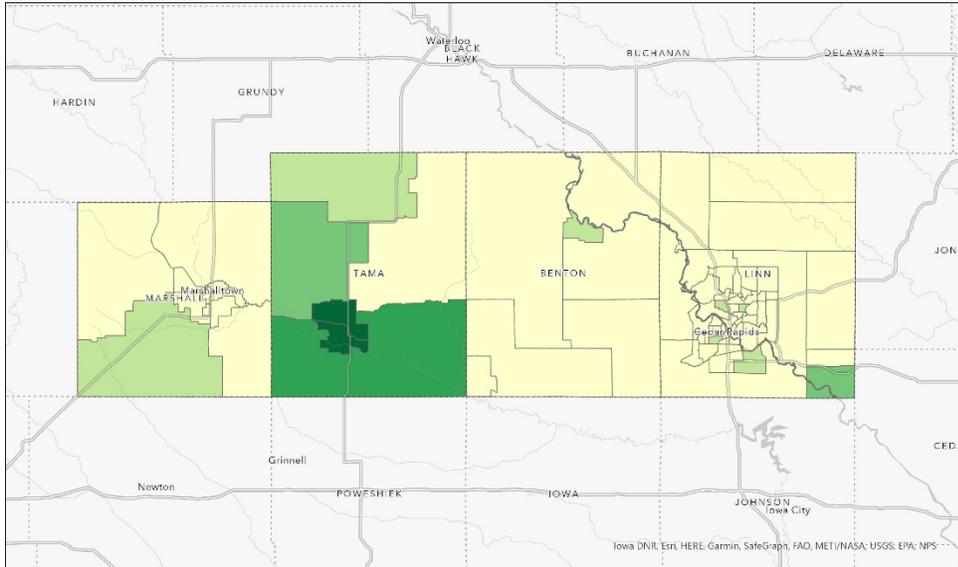


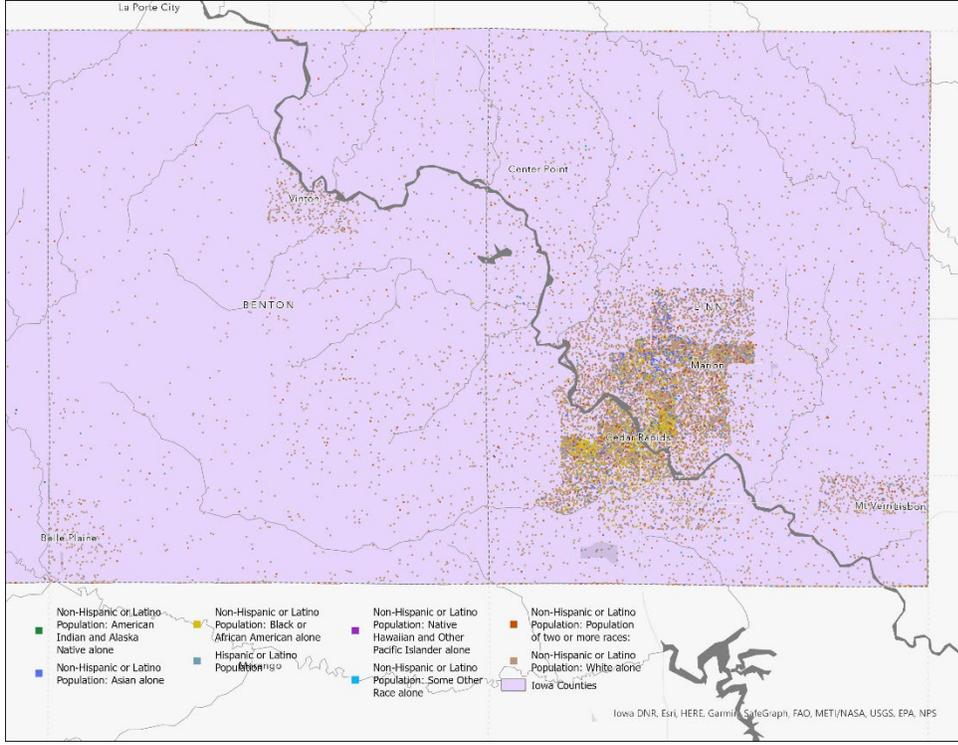
Figure XX. Percentage of Persons by Race

The following maps show the percentage of persons belonging to Federally protected classes under the Fair Housing Act by race group in the HUD and State-identified MID areas (Benton, Linn, Marshall, and Tama Counties). The data is sourced from the American Community Survey (2020).

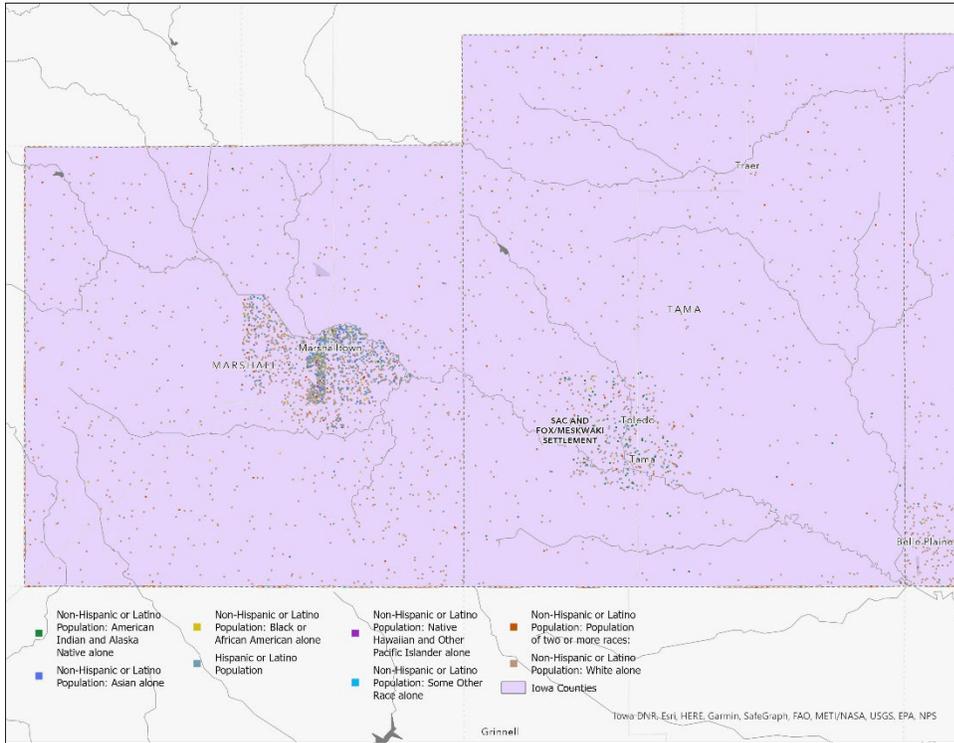




<ul style="list-style-type: none"> <0.4% 0.4% - 1.6% 1.6% - 3.8% 3.8% - 6.6% 6.6% - 16.6% 	<h3>Percent of Population that is American Indian and Alaska Native, 2020</h3> <p>American Community Survey, 2020 5-Year Estimate</p>	<p>0 10 20 Miles</p>
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<ul style="list-style-type: none"> Non-Hispanic or Latino Population: American Indian and Alaska Native alone Non-Hispanic or Latino Population: Asian alone 	<ul style="list-style-type: none"> Non-Hispanic or Latino Population: Black or African American alone Hispanic or Latino Population 	<ul style="list-style-type: none"> Non-Hispanic or Latino Population: Native Hawaiian and Other Pacific Islander alone Non-Hispanic or Latino Population: Some Other Race alone 	<ul style="list-style-type: none"> Non-Hispanic or Latino Population: Population of two or more races Non-Hispanic or Latino Population: White alone Iowa Counties <p>Iowa DNR, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS</p>
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Number of Foreign Born Residents

2020 / ACS 5-Year Estimates Detailed Tables

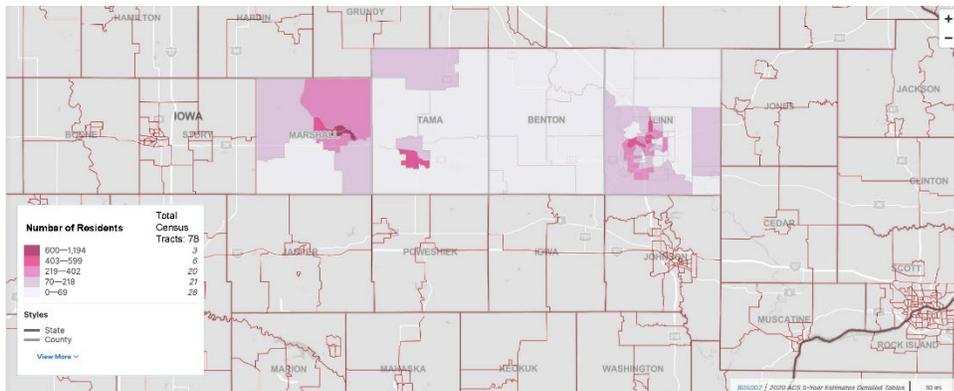
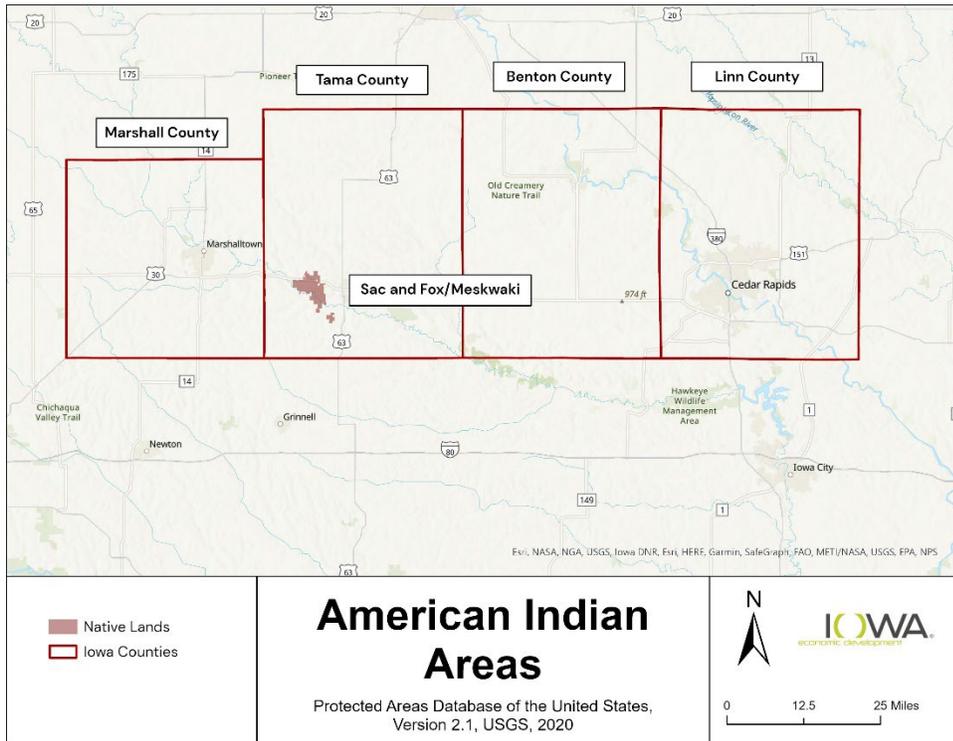


Figure XX. Indigenous Populations and Tribal Communities

The figure below shows the indigenous populations and tribal communities identified in the MID areas ((Benton, Linn, Marshall, and Tama Counties). Iowa’s only federally recognized Indian tribe and the primary group is the Meskwaki Nation of the Sac & Fox Tribe located primarily in Tama County.



EPA’s EJScreen tool is an environmental justice mapping and screening tool that provides EPA with a nationally consistent dataset and approach for combining environmental and demographic indicators.⁷ EJScreen evaluates 12 environmental and seven demographic indicators and consolidates the two indicators into 12 environmental justice (EJ) indicators. Each EJ index combines demographic indicators with a single environmental indicator.

The four counties rank higher than the State or regional average on several EJ indicators, including particulate matter 2.5 (PM 2.5) exposure and ozone exposure. See Table 17 for EJScreen indicators within the counties.

Table 17. EJScreen Environmental Justice Indicators – Benton, Linn, Marshall, and Tama Counties



EJScreen Report (Version 2.0)



County: Linn,Benton,Tama,Marshall, IOWA, EPA Region 7

Approximate Population: 306,493

Input Area (sq. miles): 2738.30

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 (µg/m ³)	8.65	8.23	70	8.26	70	8.74	51
Ozone (ppb)	42.4	41.8	72	44.1	31	42.6	51
2017 Diesel Particulate Matter* (µg/m ³)	0.194	0.17	67	0.221	50-60th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	22	22	90	26	50-60th	29	<50th
2017 Air Toxics Respiratory HI*	0.26	0.24	83	0.33	<50th	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	450	390	79	410	76	710	66
Lead Paint (% Pre-1960 Housing)	0.34	0.41	42	0.33	58	0.28	67
Superfund Proximity (site count/km distance)	0.16	0.11	82	0.1	85	0.13	80
RMP Facility Proximity (facility count/km distance)	1	1.2	57	0.95	67	0.75	76
Hazardous Waste Proximity (facility count/km distance)	0.48	0.45	69	1	52	2.2	43
Underground Storage Tanks (count/km ²)	1.9	1.7	73	2.5	66	3.9	57
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.015	0.21	90	2.9	75	12	72

Early in 2022, the Council on Environmental Quality released a beta version of a Climate and Economic Justice Screening Tool. The tool identifies disadvantaged communities, which are defined as “those that are marginalized, underserved, and overburdened by pollution. These communities are at or above the combined thresholds in one or more of eight categories of criteria.”⁸ The criteria for identifying whether a census tract is a disadvantaged community is determining whether the tract is above a defined threshold for one or more environmental, climate, health, or socioeconomic burden indicators, and whether the tract is above the defined thresholds for socioeconomic indicators.

⁷ EPA, EJScreen.

⁸ Climate and Economic Justice Screening Tool, U.S. Council of Environmental Quality.



Linn County has five census tracts that are identified as disadvantaged (all in Cedar Rapids), Marshall County has two census tracts that are identified as disadvantaged, and Tama County has one census tract that is identified as disadvantaged (see Figure 7). There are no flagged thresholds in Benton County.

Through its programs IEDA will monitor to ensure that CDBG-DR funds will benefit racial and ethnic minorities in proportion to their communities’ needs and not have an unjustified discriminatory effect on their health, safety, and housing needs. Environmental Justice is a consideration in New Construction programs in that they encourage orderly development that will result in new resilient housing stock utilizing the existing municipal services. By also requiring affordability for units means that other units are at market rate and the multi-family building will have varying levels of income. Lastly, by using modern methods to make the new housing stock more resilient, homeowners and renters will be protected from effects of extreme weather events and other natural hazards.

Figure 7. Climate and Economic Justice Screening Tool Disadvantaged Census Tracts – Linn, Marshall, and Tama Counties



2.2.4.1 Statewide Demographics and Disaster-Impacted Populations

Table 18: Statewide Demographics and Disaster-Impacted Populations

Demographic	State Estimates	State Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Estimates	MID Percentage
Total population	3,106,492	100%	1,602,044	51.6%	223,679	7.2%
Under 5 years	195,462	6.3%	102,693	6.4%	14,148	6.3%
65 years and older	514,976	16.6%	235,224	14.7%	34,880	15.6%
Population with a Disability	365,878	11.8%	167,090	10.4%	22,410	10.0%
White or Caucasian	2,769,025	89.1%	1,384,148	86.4%	195,778	87.5%



Black or African American	112,676	3.6%	77,624	4.8%	12,342	5.5%
American Indian and/or Alaska Native	10,133	0.3%	4,588	0.3%	399	0.2%
Asian	79,011	2.5%	58,130	3.6%	5,114	2.3%
Native Hawaiian and Other Pacific Islander	3,923	0.1%	1,202	0.1%	352	0.2%
Other	131,724	4.2%	76,352	4.8%	9,694	4.3%

Reference: [2019 American Community Survey 5-Year Estimate Race and Ethnicity](#)

2.2.4.2 Education Demographics

Table 19: Education Demographics

Education	State Estimates	State Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Estimates	MID %
Population 25 and over	2,092,785	100%	1,056,394	50.5%	150,555	7.2%
Less than high school graduate	165,514	7.9%	74,913	7.1%	8,290	5.5%
High school graduate or equivalency	648,398	31%	289,269	27.4%	40,706	27.0 %
Some college, associate degree	681,042	32.5%	330,531	31.3%	51,669	34.3 %
Bachelor's degree or higher	597,831	29%	361,681	34.2%	49,890	33.1 %

Reference: [2019 American Community Survey 5-Year Estimate Educational Attainment](#)

2.2.4.3 Income Demographics

Table 20: Income Demographics

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Median Household Income	\$60,523.00	\$64,568.00	\$67,301.00
Per Capita Income	\$33,021.00	\$34,936.61	\$36,321.00

Reference: [2019 American Community Survey 5-Year Estimate Income Demographics](#)

Table 21: Income Demographics - Low Income

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	339,090	175,032	20,670

Reference: [2019 American Community Survey 5-Year Estimate Income Demographics](#)



2.2.4.4 LMI Analysis – Overall

Table 22: LMI Analysis – Overall

Category	Total LMI Persons	Total Population	Percentage LMI
Statewide	1,230,035	2,992,805	41.1%

Reference: [FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data - HUD Exchange](#)

2.2.4.5 LMI Analysis – Federally Declared Disaster Areas

Table 23: LMI Analysis – Federally Declared Disaster Areas

County	Non-MID Total LMI Persons	Non-MID Total Population	Non-MID Percentage LMI	MID Total LMI Persons	MID Total Population	MID Percentage LMI
Benton	9,553	25,470	37.5%	0	0	0.0%
Boone	10,255	25,480	40.2%	0	0	0.0%
Cedar	5,784	18,020	32.1%	0	0	0.0%
Clinton	19,370	47,440	40.8%	0	0	0.0%
Dallas	19,475	74,275	26.2%	0	0	0.0%
Greene	3,999	9,054	44.2%	0	0	0.0%
Grundy	3,795	12,270	30.9%	0	0	0.0%
Guthrie	5,014	10,559	47.5%	0	0	0.0%
Hardin	6,503	16,535	39.3%	0	0	0.0%
Iowa	6,160	15,970	38.6%	0	0	0.0%
Jackson	7,773	19,330	40.2%	0	0	0.0%
Jasper	13,240	34,810	38.0%	0	0	0.0%
Johnson	62,280	131,290	47.4%	0	0	0.0%
Jones	6,805	19,095	35.6%	0	0	0.0%
Linn	0	0	0.0%	83,409	211,670	39.4%
Marshall	16,269	39,849	40.8%	0	0	0.0%
Muscatine	16,380	42,340	38.7%	0	0	0.0%
Polk	182,244	443,170	41.1%	0	0	0.0%
Poweshiek	6,800	16,945	40.1%	0	0	0.0%
Scott	62,685	166,880	37.6%	0	0	0.0%
Story	42,830	84,485	50.7%	0	0	0.0%
Tama	6,145	17,080	36.0%	0	0	0.0%
Washington	8,590	21,665	39.6%	0	0	0.0%
Total	521,949	1,292,012	40.40%	83,409	211,670	39.40%

Reference: [FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data - HUD Exchange](#)



2.2.4.6 Manufactured Housing Units Impacted by Disaster

Table 24: Manufactured Housing Units Impacted by Disaster

County	No. of Units	% of Total Units in County	Unmet Need
Benton	66	0.26%	\$208,430
Boone	23	0.09%	\$25,410
Cedar	16	0.09%	\$0
Clinton	12	0.03%	\$11,230
Jasper	40	0.11%	\$68,898
Linn	1,033	0.47%	\$1,712,210
Marshall	67	0.17%	\$138,133
Polk	66	0.01%	\$122,515
Poweshiek	17	0.10%	\$20,333
Scott	59	0.03%	\$65,943
Story	50	0.06%	\$88,668
Tama	21	0.13%	\$46,798
TOTAL	1,470	0.13%	\$2,508,282

Reference: FEMA Individual Assistance Dataset April 2022; 2019 American Community Survey 5-Year Estimate Housing Tenure

2.2.4.7 SNAP and D-SNAP Applicants Impacted by the Disaster

Table 25: SNAP and D-SNAP Applicants Impacted by the Disaster

County	No. of SNAP Households Impacted	No. of SNAP Individuals Impacted	No. of Households Issued D-SNAP Benefits	No. of Individuals Issued D-SNAP Benefits
Benton	880	1,663	68	193
Boone	871	1,652	282	838
Cedar	443	953	39	107
Clinton	3,287	6,262	36	87
Dallas	1,327	2,805	0	0
Greene	444	904	0	0
Grundy	264	564	0	0
Guthrie	399	796	0	0
Hardin	703	1,464	0	0
Iowa	387	792	0	0
Jackson	814	1,620	0	0
Jasper	1,783	3,406	789	2,210
Johnson	4,696	9,367	0	0
Jones	744	1,463	0	0
Linn	11,682	22,432	5,827	15,818
Marshall	1,981	4,181	1,928	6,798





Muscatine	2,545	5,183	0	0
Polk	28,741	56,750	8,163	23,850
Poweshiek	578	1,103	366	979
Scott	11,735	22,657	5,339	12,087
Story	2,141	3,985	352	955
Tama	655	1,443	810	2,398
Washington	777	1,587	0	0
Total	77,877	153,032	23,999	66,320

Reference: [Iowa Department of Human Services SNAP & D-SNAP Report](#)



2.2.4.8 Limited English Proficiency Breakdown

Table 26: Limited English Proficiency Breakdown

County	Estimate Speak English Less Than “Very Well”	Percentage Speak English Less Than “Very Well”
Benton	125	0.49%
Boone	174	0.66%
Cedar	98	0.53%
Clinton	314	0.67%
Dallas	3,518	3.89%
Greene	156	1.75%
Grundy	88	0.72%
Guthrie	116	1.08%
Hardin	270	1.60%
Iowa	118	0.73%
Jackson	76	0.39%
Jasper	555	1.50%
Johnson	8,149	5.40%
Jones	151	0.73%
Linn	5,155	2.29%
Marshall	4,547	11.42%
Muscatine	1,741	4.08%
Polk	24,961	5.14%
Poweshiek	218	1.19%
Scott	3,996	2.31%
Story	4,209	4.32%
Tama	575	3.39%
Washington	688	3.11%
TOTAL	59,998	3.70%

Reference: [2019 American Community Survey 5-Year Estimate Language Spoken at Home](#)



2.2.4.9 Languages Spoken Within the State

Table 27: Languages Spoken Within State

Languages Spoken	Estimated Number of Population	Percentage of Population	County
Speak only English	23,341	0.74%	Benton
Speak Spanish	297	0.01%	Benton
Speak other Indo-European languages	330	0.01%	Benton
Speak Asian and Pacific Island languages	2	0.00%	Benton
Speak other languages	3	0.00%	Benton
Speak only English	24,289	0.77%	Boone
Speak Spanish	483	0.02%	Boone
Speak other Indo-European languages	154	0.00%	Boone
Speak Asian and Pacific Island languages	1	0.00%	Boone
Speak other languages	0	0.00%	Boone
Speak only English	17,301	0.55%	Cedar
Speak Spanish	194	0.01%	Cedar
Speak other Indo-European languages	28	0.00%	Cedar
Speak Asian and Pacific Island languages	12	0.00%	Cedar
Speak other languages	30	0.00%	Cedar
Speak only English	43,068	1.37%	Clinton
Speak Spanish	467	0.01%	Clinton
Speak other Indo-European languages	148	0.00%	Clinton
Speak Asian and Pacific Island languages	227	0.01%	Clinton
Speak other languages	49	0.00%	Clinton
Speak only English	74,222	2.36%	Dallas
Speak Spanish	3,736	0.12%	Dallas
Speak other Indo-European languages	2,767	0.09%	Dallas
Speak Asian and Pacific Island languages	2,064	0.07%	Dallas
Speak other languages	764	0.02%	Dallas
Speak only English	8,060	0.26%	Greene
Speak Spanish	224	0.01%	Greene
Speak other Indo-European languages	33	0.00%	Greene
Speak Asian and Pacific Island languages	47	0.00%	Greene
Speak other languages	45	0.00%	Greene
Speak only English	11,333	0.36%	Grundy
Speak Spanish	172	0.01%	Grundy
Speak other Indo-European languages	80	0.00%	Grundy





Languages Spoken	Estimated Number of Population	Percentage of Population	County
Speak Asian and Pacific Island languages	21	0.00%	Grundy
Speak other languages	0	0.00%	Grundy
Speak only English	9,919	0.31%	Guthrie
Speak Spanish	164	0.01%	Guthrie
Speak other Indo-European languages	25	0.00%	Guthrie
Speak Asian and Pacific Island languages	47	0.00%	Guthrie
Speak other languages	0	0.00%	Guthrie
Speak only English	15,456	0.49%	Hardin
Speak Spanish	482	0.02%	Hardin
Speak other Indo-European languages	85	0.00%	Hardin
Speak Asian and Pacific Island languages	14	0.00%	Hardin
Speak other languages	73	0.00%	Hardin
Speak only English	14,839	0.47%	Iowa
Speak Spanish	176	0.01%	Iowa
Speak other Indo-European languages	174	0.01%	Iowa
Speak Asian and Pacific Island languages	40	0.00%	Iowa
Speak other languages	2	0.00%	Iowa
Speak only English	17,760	0.56%	Jackson
Speak Spanish	193	0.01%	Jackson
Speak other Indo-European languages	137	0.00%	Jackson
Speak Asian and Pacific Island languages	97	0.00%	Jackson
Speak other languages	0	0.00%	Jackson
Speak only English	33,574	1.07%	Jasper
Speak Spanish	558	0.02%	Jasper
Speak other Indo-European languages	262	0.01%	Jasper
Speak Asian and Pacific Island languages	167	0.01%	Jasper
Speak other languages	408	0.01%	Jasper
Speak only English	120,125	3.81%	Johnson
Speak Spanish	6,009	0.19%	Johnson
Speak other Indo-European languages	5,899	0.19%	Johnson
Speak Asian and Pacific Island languages	5,610	0.18%	Johnson
Speak other languages	4,349	0.14%	Johnson
Speak only English	19,113	0.61%	Jones
Speak Spanish	190	0.01%	Jones
Speak other Indo-European languages	81	0.00%	Jones





Languages Spoken	Estimated Number of Population	Percentage of Population	County
Speak Asian and Pacific Island languages	132	0.00%	Jones
Speak other languages	0	0.00%	Jones
Speak only English	199,149	6.32%	Linn
Speak Spanish	3,673	0.12%	Linn
Speak other Indo-European languages	3,620	0.11%	Linn
Speak Asian and Pacific Island languages	2,877	0.09%	Linn
Speak other languages	2,134	0.07%	Linn
Speak only English	29,024	0.92%	Marshall
Speak Spanish	6,659	0.21%	Marshall
Speak other Indo-European languages	269	0.01%	Marshall
Speak Asian and Pacific Island languages	1,184	0.04%	Marshall
Speak other languages	52	0.00%	Marshall
Speak only English	34,405	1.09%	Muscatine
Speak Spanish	4,663	0.15%	Muscatine
Speak other Indo-European languages	519	0.02%	Muscatine
Speak Asian and Pacific Island languages	206	0.01%	Muscatine
Speak other languages	174	0.01%	Muscatine
Speak only English	390,654	12.40%	Polk
Speak Spanish	25,778	0.82%	Polk
Speak other Indo-European languages	12,362	0.39%	Polk
Speak Asian and Pacific Island languages	14,366	0.46%	Polk
Speak other languages	8,020	0.25%	Polk
Speak only English	16,657	0.53%	Poweshiek
Speak Spanish	421	0.01%	Poweshiek
Speak other Indo-European languages	168	0.01%	Poweshiek
Speak Asian and Pacific Island languages	225	0.01%	Poweshiek
Speak other languages	28	0.00%	Poweshiek
Speak only English	151,305	4.80%	Scott
Speak Spanish	5,090	0.16%	Scott
Speak other Indo-European languages	2,518	0.08%	Scott
Speak Asian and Pacific Island languages	2,650	0.08%	Scott
Speak other languages	389	0.01%	Scott
Speak only English	82,026	2.60%	Story
Speak Spanish	1,902	0.06%	Story
Speak other Indo-European languages	2,476	0.08%	Story



Languages Spoken	Estimated Number of Population	Percentage of Population	County
Speak Asian and Pacific Island languages	5,988	0.19%	Story
Speak other languages	562	0.02%	Story
Speak only English	13,998	0.44%	Tama
Speak Spanish	1,219	0.04%	Tama
Speak other Indo-European languages	98	0.00%	Tama
Speak Asian and Pacific Island languages	9	0.00%	Tama
Speak other languages	550	0.02%	Tama
Speak only English	19,075	0.61%	Washington
Speak Spanish	895	0.03%	Washington
Speak other Indo-European languages	584	0.02%	Washington
Speak Asian and Pacific Island languages	112	0.00%	Washington
Speak other languages	0	0.00%	Washington

Reference: [2019 American Community Survey 5-Year Estimate Language Spoken at Home](#)

2.2.4.10 Affected Continuum of Care (CoC) Entities

Table 28: Affected Continuum of Care (CoC) Entities

CoC Number	CoC Entity	Impacted County	Homeless Count
IA-501	Iowa Balance of State CoC	Benton	0
IA-501	Iowa Balance of State CoC	Boone	21
IA-501	Iowa Balance of State CoC	Cedar	0
IA-501	Iowa Balance of State CoC	Clinton	110
IA-501	Iowa Balance of State CoC	Dallas	31
IA-501	Iowa Balance of State CoC	Greene	0
IA-501	Iowa Balance of State CoC	Grundy	0
IA-501	Iowa Balance of State CoC	Guthrie	0
IA-501	Iowa Balance of State CoC	Hardin	0
IA-501	Iowa Balance of State CoC	Iowa	0
IA-501	Iowa Balance of State CoC	Jackson	0
IA-501	Iowa Balance of State CoC	Jasper	14
IA-501	Iowa Balance of State CoC	Johnson	113
IA-501	Iowa Balance of State CoC	Jones	0
IA-501	Iowa Balance of State CoC	Linn	324
IA-501	Iowa Balance of State CoC	Marshall	6
IA-501	Iowa Balance of State CoC	Muscatine	13
IA-501	Iowa Balance of State CoC	Poweshiek	10



CoC Number	CoC Entity	Impacted County	Homeless Count
IA-501	Iowa Balance of State CoC	Scott	291
IA-501	Iowa Balance of State CoC	Story	94
IA-501	Iowa Balance of State CoC	Tama	0
IA-501	Iowa Balance of State CoC	Washington	17
IA-502	Des Moines/Polk County CoC	Polk	576
Total			1,620

Reference: [2021 Point in Time Count ICA](#)

2.2.4.11 Point-in-Time Count – Type of Shelter

Table 29: Point-in-Time Count – Type of Shelter

Scale of Data	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	1,645	517	439	2,628

Reference: [2022 Point in Time Count ICA](#)

2.2.4.12 Point-in-Time Count – Impacted by Disaster

Table 30: Point-in-Time Count – Impacted by Disaster

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area Wide	1,645	517	439	2,628
FEMA Declared	1,072	338	241	1,675
MID	127	105	11	243

Reference: [2022 Point in Time Count ICA](#)

2.2.4.13 HUD-Assisted Housing Impacted by Disaster

Data not available at this time for HUD-assisted housing impacted by the disaster.

Table 31: Point-in-Time Count – Impacted by Disaster

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Benton	0	0	0	0	0	0	0



Boone	0	0	229	0	0	0	0
Cedar	0	0	24	0	0	0	0
Clinton	0	0	328	0	0	0	0
Dallas	0	0	1,123	0	0	0	0
Greene	0	0	59	0	0	0	0
Grundy	0	0	16	0	0	0	0
Guthrie	0	0	10	0	0	0	0
Hardin	0	0	71	0	0	0	0
Iowa	0	0	48	0	0	0	0
Jackson	0	0	64	0	0	0	0
Jasper	0	0	497	0	0	0	0
Johnson	0	0	907	0	0	0	0
Jones	0	0	0	0	0	0	0
Linn	0	0	2,147	4	0	0	0
Marshall	0	0	346	2	0	0	0
Muscatine	0	0	422	0	0	0	0
Polk	0	0	6,839	0	0	0	0
Poweshiek	0	0	105	0	0	0	0
Scott	0	0	1,977	0	0	0	0
Story	0	0	373	0	0	0	0
Tama	0	0	48	0	0	0	0
Washington	0	0	54	0	0	0	0
Total	0	0	15,687	6	0	0	0

Reference: April 2021, LIHTC Dataset Iowa Finance Authority

2.3 Infrastructure Unmet Needs

2.3.1 Disaster Damage and Impacts

Iowa faces various natural hazards such as windstorms, flash floods, river floods, severe winter storms, thunderstorms, lightning and hail, and extreme heat. These hazards can significantly impact Iowa’s housing stock, agriculture, and infrastructure systems. As per [FEMA’s Community Lifelines](#), shelter and energy are critical elements to making sure that communities have the resources to respond to emergencies during disaster events. Using Iowa’s Green Streets Criteria, IEDA will encourage subrecipients to use better construction materials to build more resilient homes that can withstand windstorms and flooding events. For future storms, more resilient homes will help reduce the number of residents displaced from their homes due to storms.



Also, as described in data and conversations with virtually every community in the MID areas, the storm severely impacted trees and essential power capacity. Damage to trees has a major impact on the residents' heating and cooling energy uses, and the lack of reliable power sources during the storm hindered the response of emergency services and the ability for residents to seek help. While several local governments have existing programs and some available funding. IEDA will align the CDBG-DR investment with the need and current investments planned by local governments.

2.3.1.1 Loss of a Significant Portion of Iowa's Tree Canopy

The highest wind speeds recorded during the derecho event peaked at about 140 mph. The wind speeds damaged acres of urban tree canopy that help reduce ground temperatures and air pollution. Without the tree canopy, the State anticipated seeing higher utility bills due to the heat and limited protection from stormwater runoff.

An aerial survey conducted by the Iowa Department of Natural Resources and the nonprofit organization Trees Forever estimated that a total of 4.4 million trees had been damaged or destroyed across 103,193 acres. The survey looked at existing trees exhibiting signs of damage or mortality. When calculating for the cost of losing the benefit of carbon sequestration that trees provide, the cost is \$90 million.⁹ It will take years of sustained replanting efforts across the State in order to replace the tree population that was lost.

For local communities, there are still hazards that remain from trees that have not been cleared and the removal of damaged trees is still ongoing. The main focus of many communities is on replanting trees and restoring the environment to pre-disaster conditions to aid in disaster preparedness.

2.3.1.2 Need for Reliable Power Source

From the consultations with local communities, the feedback indicated that several communities and parts of Cedar Rapids were without power for nearly two weeks while power lines were down and being repaired by utility providers. The lack of power in homes resulted in the loss of food and medicine for families and lack of power in critical facilities hindered the efficiency of communications and public services. Some critical facilities, such as hospitals and fire stations, had generators but had to rely on fuel deliveries from the Iowa National Guard to keep generators online. The storm highlighted the need for resiliency and redundancy in how power is distributed for emergency shelters and other facilities during a storm.

The CDBG-DR program will fund the installation of new generators for critical facilities that offer shelter to residents or provide a critical service during a disaster. Generators will utilize modern technology to ensure that they are optimized for power production, align with the need of the

⁹ [Iowa Department of Natural Resources, Assessment of urban tree canopy damage resulting from the August 2020 Midwest Derecho.](#)



facility, can operate for an extended period of time, and can cover the range of power needed at various times during a disaster event.

2.3.2 FEMA Public Assistance Program

The FEMA Public Assistance Program provides supplemental grants to state, tribal, territorial, and local governments, and certain types of private non-profits, so that communities can quickly respond to and recover from major disasters or emergencies. FEMA also encourages protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process.

As of March 2022, for DR-4557, the State’s obligation has been established as 10 percent of eligible project costs while the federal share has been established as 90 percent. The State will not be allocating funds to address this unmet need as the unmet need analysis and community consultation shows that the allocation should be prioritized to other infrastructure needs.

The tables below indicate the amount of FEMA Public Assistance funding and need based on the number of damaged sites and obligations determined by FEMA by damage category type.

Table 32: FEMA Public Assistance Program

PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A – Debris Removal	215	\$38,226,173.18	\$34,403,555.86	\$3,822,617.32
B – Emergency Protective Measures	140	\$4,103,506.80	\$3,693,156.12	\$410,350.68
C – Roads and Bridges	34	\$897,997.95	\$808,198.16	\$89,799.80
D – Water Control Facilities	1	\$6,075.00	\$5,467.50	\$607.50
E – Buildings and Equipment	99	\$3,566,801.69	\$3,210,121.52	\$356,680.17
F – Utilities	41	\$9,582,990.58	\$8,624,691.52	\$958,299.06
G – Parks, Recreational Facilities, and Other Items	51	\$1,240,339.32	\$1,116,305.39	\$124,033.93
All Categories	581	\$57,623,884.52	\$51,861,496.07	\$5,762,388.46
TOTAL- without A and B	226	\$15,294,204.54	\$13,764,784.09	\$1,529,420.46

Reference: [Iowa FEMA Public Assistance Data February 2022](#)



2.3.3 Total Cost and Need by Public Assistance (PA) Category

Table 33: Total Cost and Need by PA Category

PA Category	Estimated PA Cost	10% Local Match	15% Resiliency	Total Need (Match + Resiliency)
A – Debris Removal	\$38,226,173.18	\$3,822,617.32	\$5,733,925.98	\$9,556,543.30
B – Emergency Protective Measures	\$4,103,506.80	\$410,350.68	\$615,526.02	\$1,025,876.70
C – Roads and Bridges	\$897,997.95	\$89,799.80	\$134,699.69	\$224,499.49
D – Water Control Facilities	\$6,075.00	\$607.50	\$911.25	\$1,518.75
E – Buildings and Equipment	\$3,566,801.69	\$356,680.17	\$535,020.25	\$891,700.42
F – Utilities	\$9,582,990.58	\$958,299.06	\$1,437,448.59	\$2,395,747.65
G – Parks, Recreational Facilities, and Other Items	\$1,240,339.32	\$124,033.93	\$186,050.90	\$310,084.83
TOTAL All Categories	\$57,623,884.52	\$5,762,388.46	\$8,461,582.68	\$14,405,971.14

Reference: [Iowa FEMA Public Assistance Data February 2022](#)

2.3.4 Approximate Recovery Cost per Agency

The table below shows the State agencies that have identified damaged sites that are eligible to receive FEMA Public Assistance and their approximate cost to be reimbursed.

Table 34: Approximate Recovery Cost per Agency

Agency	Approximate Cost
Anamosa State Penitentiary – Department of Corrections	\$17,773.35
Iowa Communications Network	\$44,255.62
Iowa Correctional Institution for Women	\$61,759.11
Iowa Department of Human Services	\$445,105.32
Iowa Department of Natural Resources – Parks Bureau	\$609,687.11
Iowa Department of Public Defense – Military Division	\$24,343.54
Iowa Department of Transportation	\$0.00
Iowa Homeland Security and Emergency Management Department	\$2,900,981.47
Iowa PBS	\$29,722.79
Iowa State University	\$1,236,518.78
Iowa Veterans Home	\$404,721.36
Sixth Judicial District – Department of Corrections	\$80,806.08
University of Iowa	\$10,873.43
Total	\$5,866,547.96

Reference: [Iowa FEMA Public Assistance Data February 2022](#)



2.3.5 Hazard Mitigation Needs per County or Known Project

The table below indicates the amount of FEMA HMGP funding and need based on the eligible applications received to date. The table below reflects a projected 90% federal cost share and 10% non-federal cost share.

Table 35: Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need (10% Local Match)
Black Hawk	\$1,396,505.02	\$1,256,854.52	\$139,650.50
Bremer	\$3,195,348.00	\$2,875,813.20	\$319,534.80
Buena Vista	\$25,285.03	\$22,756.53	\$2,528.50
Carroll	\$9,923.67	\$8,931.30	\$992.37
Cedar	\$77,728.04	\$69,955.24	\$7,772.80
Cerro Gordo	\$2,098,924.20	\$1,889,031.78	\$209,892.42
Cherokee	\$2,713,610.80	\$2,442,249.72	\$271,361.08
Dallas	\$279,370.85	\$251,433.77	\$27,937.09
Des Moines	\$2,364,489.66	\$2,128,040.69	\$236,448.97
Dickinson	\$66,078.83	\$59,470.95	\$6,607.88
Iowa	\$174,567.80	\$157,111.02	\$17,456.78
Johnson	\$306,834.90	\$276,151.41	\$30,683.49
Jones	\$29,272.68	\$26,345.41	\$2,927.27
Keokuk	\$18,230.02	\$16,407.02	\$1,823.00
Linn	\$3,133,444.50	\$2,820,100.05	\$313,344.45
Marion	\$306,812.48	\$276,131.23	\$30,681.25
Marshall	\$3,235,863.10	\$2,912,276.79	\$323,586.31
Multiple Counties	\$2,766,483.00	\$2,489,834.70	\$276,648.30
Poweshiek	\$384,905.40	\$346,414.86	\$38,490.54
Scott	\$3,195,829.29	\$2,876,246.36	\$319,582.93
Statewide	\$18,863,446.40	\$16,977,101.76	\$1,886,344.64
Story	\$25,425.00	\$22,882.50	\$2,542.50
Wapello	\$2,766,383.00	\$2,489,744.70	\$276,638.30
Wayne	\$22,500.00	\$20,250.00	\$2,250.00
Webster	\$40,149.01	\$36,134.11	\$4,014.90
Winneshiek	\$205,071.60	\$184,564.44	\$20,507.16
TOTAL	\$47,732,482.28	\$42,932,234.05	\$4,770,248.23

Reference: [Iowa FEMA HMGP Application Data April 2022](#)



2.4 Economic Revitalization Unmet Needs

2.4.1 Disaster Damage and Impacts

Iowa's economy took a heavy hit from the 2020 Midwest Derecho. Housing units were damaged or deemed unlivable in the week after the storm, many agricultural farmlands were destroyed in Iowa, which serves as a major food and ethanol supplier, and businesses faced structural damages and/or were either shutdown for weeks due to lack of patronage. Many residents have reportedly lost jobs due to 2020 pandemic, but also due to local conditions exacerbated by the derecho.

The impact to pre-disaster conditions can be seen in how the storm damaged the housing stock and worsened the availability of affordable housing. This impact created an immediate surge in demand for people – especially low-and-moderate income people – looking for affordable housing after the derecho and for a diversity in available housing options. By addressing housing to increase both the stock and the resiliency of housing, the State will look to restore and improve on the housing market.

Additionally, with the focus on the tree planting, there is an opportunity to restore the substantial loss in benefits from Iowa's tree canopy. Trees are important as they can support higher home values and lower energy usage in homes. As reported by the Iowa's Department of Natural Resources, the overall loss is in the billions which will take years to restore to pre-disaster conditions. The State will support existing local efforts by providing additional funding to cover the need for tree stump removal and further native tree planting on public property, freeing local resources to assist with replanting efforts private property.

2.4.1.1 Derecho Impact on Iowa Agriculture

Iowa's corn and soybean farms are estimated to have suffered \$802 million in damages.¹⁰ The Iowa Department of Agriculture and Land Stewardship reported that more than 57 million bushels of grain storage were destroyed and would cost more than \$300 million to remove, replace, or repair the damaged grain storage bins. Iowa farmers were fortunately able to access insurance proceeds to cover 95% of the costs.

2.4.1.2 Impact on Iowa's Businesses

Iowa's businesses saw decreased revenue and sales due to downed power lines, street debris, and the lack of internet and phone communications that forced many to temporarily close. Again, insurance proceeds have helped reimburse economic losses.¹¹

¹⁰ [American Farm Bureau Federation](#), 2020 Disaster Estimations Reveal at Least \$3.6 Billion in Uncovered Losses.

¹¹ [Cedar Rapids Economic Development](#), Business Storm Loss Survey Report.



2.4.2 Total Business Loans Approved by the SBA

The Small Business Administration provides low-interest loans to homeowners who have suffered damage from natural disaster events in order to help the homeowner recover more swiftly. After a homeowner applies for a loan from the SBA, the loan undergoes an approval process and, upon approval of the loan application, an amount is determined and presented to the applicant. From here, the homeowner can accept the terms of the loan or decide to cancel their loan and decline the funds. The tables below show the dollar amount associated with businesses in their respective counties and a breakdown of business type and count.

Table 36: Total Business Loans Approved by the SBA

County	Business/EIDL Loans
Benton	\$81,900
Boone	\$12,900
Cedar	\$75,400
Iowa	\$20,000
Linn	\$1,252,300
Marshall	\$45,600
Polk	\$137,200
Poweshiek	\$84,200
Scott	\$48,600
TOTAL	\$1,758,100

Reference: [SBA Disaster Loan Statistics Report for February 22, 2022](#)



Table 37: Total Business Loans Approved by the SBA by Business Category

County	Business Code/Category	Business/EIDL Loans
Benton	Other Services	26
Boone	Child Day Care Services	1
Boone	Other Services	20
Cedar	General Freight Trucking, Local	1
Cedar	Other Services	4
Clinton	Other Services	7
Iowa	Other Services	2
Jasper	Lessors of Residential Buildings and Dwellings	1
Jasper	Other Services	14
Linn	Beauty Salons	1
Linn	Landscaping Services	1
Linn	Lessors of Nonresidential Buildings (except mini warehouses)	2
Linn	Lessors of Residential Buildings and Dwellings	23
Linn	Nail Salons	2
Linn	Painting and Wall Covering Contractors	1
Linn	Tax Preparation Services	1
Linn	Used Car Dealers	2
Linn	Other Services	388
Marshall	Other Services	30
Polk	Framing Contractors	1
Polk	Lessors of Residential Buildings and Dwellings	2
Polk	Other Services	40
Poweshiek	Lessors of Residential Buildings and Dwellings	5
Poweshiek	Other Services	8
Scott	Lessors of Residential Buildings and Dwellings	4
Scott	Other Services	34
Story	Other Services	16
Tama	Other Services	12
TOTAL	N/A	649

Reference: [SBA Disaster Loan Statistics Report for February 22, 2022](#)



2.4.3 SBA Applicant Breakdown

The table below reflects information from SBA Business/EIDL applicants and their associated application status as well as unmet need.

Table 38: SBA Applicant Breakdown

Application Type	No. of Applications	Percentage
Total Business Applications	179	100.00%
Processed Applications	179	100.00%
In-Process Applications	0	0.00%
Declined Applications	138	77.09%
Withdrawn Applications	0	0%
Approved Applications	41	22.91%
Unmet Need	\$6,065,827.36	77.91%

Reference: [SBA Disaster Loan Statistics Report for February 22, 2022](#)

2.4.4 Estimating Business Operations Losses

The table below reflects information from SBA Business/EIDL applicants, and therefore does not include loss information on businesses that did not apply to the SBA.

Table 39: Estimating Business Operations Losses

Operational Loss Category	No. of Businesses with Verified Losses	Average Verified Loss	Estimated Additional Losses to Businesses
Furniture/Fixtures	3	\$4,566.67	\$13,700.01
Machinery/Equipment	3	\$8,066.67	\$24,200.01
Inventory	1	\$1,000.00	\$1,000.00
Other (Real Estate)	544	\$20,660.11	\$11,239,099.84
TOTAL	551	\$34,293.45	\$11,277,999.86

Reference: [SBA Disaster Loan Statistics Report for February 22, 2022](#)



2.4.5 Increased Occupation Demands

The table below demonstrates the increased occupation demands in Iowa as well as employment projections and expected job sector growth.

Table 40: Increased Occupation Demands

Occupation	Currently Unemployed	Currently Employed	Projected Employment	Projected Growth	Projected Growth %	Total Job Openings	Supply Gap or Overage
Architecture and Engineering	0	80,550	86,785	6,235	8%	7,380	0
Arts, Design, Entertainment, Sports, and Media	0	95,470	101,495	6,025	6%	11,970	0
Building and Grounds Cleaning and Maintenance	0	237,250	266,715	29,465	12%	35,820	0
Business and Financial Operations	0	295,280	324,980	29,515	10%	32,060	0
Community and Social Services	0	110,720	127,910	17,190	16%	14,410	0
Computer and Mathematical	0	156,630	179,310	22,710	14%	14,540	0
Construction and Extraction	0	314,685	356,260	41,645	13%	40,820	0
Education, Training, and Library	0	489,875	530,355	40,495	8%	49,360	0
Farming, Fishing, and Forestry	0	79,370	77,280	-2,125	-3%	12,460	0
Food Preparation and Serving Related	0	546,785	596,915	50,115	9%	103,605	0
Healthcare Practitioners and Technical	0	340,845	389,675	48,865	14%	25,640	0
Healthcare Support	0	183,205	212,860	29,650	16%	25,545	0
Installation, Maintenance, and Repair	0	292,850	318,420	25,555	9%	32,475	0
Legal	0	34,765	37,680	2,895	8%	2,890	0
Life, Physical, and Social Science	0	49,000	53,865	4,885	10%	5,885	0
Management	0	703,980	740,375	36,395	5%	68,695	0
Office and Administrative Support	0	952,310	959,560	7,230	1%	113,685	0
Personal Care and Service	0	240,685	280,600	39,920	17%	43,020	0
Production	0	629,320	629,955	1,365	0%	73,695	0
Protective Service	0	90,775	95,920	5,180	6%	11,285	0
Sales and Related	0	685,735	717,505	31,755	5%	102,195	0
Transportation and Material Moving	0	571,160	625,125	54,005	9%	79,065	0

Reference: [Iowa Workforce Development Occupational Projections](#)



2.5 Mitigation-Only Activities

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural threats and hazards in Benton, Linn, Marshall, and Tama counties—the four counties that HUD and IEDA define as “most impacted and distressed” (MID) by the 2020 Midwest Derecho. The Mitigation Needs Assessment was undertaken to inform the use of the State’s 15% CDBG – Mitigation set-aside and to help build resilience and mitigation measures into recovery programs and projects.

Importantly, this assessment does not only look at windstorm risk but also any natural hazard likely to threaten Benton, Linn, Marshall, and Tama counties, including flash floods, river floods, severe winter storms, thunderstorms, lightning and hail, and extreme heat. These hazards were identified in Iowa’s FEMA-approved Enhanced Hazard Mitigation Plan (EHMP), as well as the multi-jurisdictional plans for Benton, Linn, Marshall, and Tama counties.

In addition to current hazards posed to the MID counties, the Mitigation Needs Assessment considers future threats, particularly as severe weather events become more frequent and severe. In this way, the State can ensure that it minimizes vulnerabilities to the impacts of future extreme events through its recovery and mitigation projects and programs.

This assessment will provide a basis upon which to propose programs and projects as part of this plan that will mitigate current and future hazards. In addition, it will inform all projects undertaken through CDBG-DR such that, at a minimum, they do not exacerbate natural hazard threats and make use of scarce resources for recovery and mitigation.

As part of this assessment, the State also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions, and/or are critical to human health and safety and economic security.

2.5.1 Greatest Risk Hazards

Analysts identified the greatest risk hazards as those natural hazards designated either as “High Priority” in the Marshall County Hazard Mitigation Plan or “Priority Level 1” in the Linn County Multi-Jurisdictional Hazard Mitigation Plan.

2.5.1.1 Tornado and Windstorm

A tornado is a violent windstorm characterized by a twisting, funnel-shaped cloud. Tornadoes are most often generated by thunderstorm activity but sometimes result from hurricanes and other tropical storms. Tornadoes occur when cool, dry air intersects and overrides a layer of warm, moist air, forcing the warm air to rise rapidly. Tornado wind speeds normally range from 65 mph to more than 200 mph but can reach more than 300 mph. The maximum winds in tornadoes are often confined to extremely small areas and vary tremendously over short distances, even within the funnel itself. These storms typically travel around 10 to 20 mph but can move at more than 60 mph. Damage paths can vary from as narrow as 1 mile to as wide as 50 miles. Tornadoes can occur at any time of the year and at any time of the day.



Tornadoes are measured by their intensity in terms of wind speed and their area using the Enhanced Fujita (EF) Scale. The scale ranges from EF0, with minor damages from winds ranging 65–85 mph, to EF5 with severe damages from winds more than 200 mph.¹²

Table 41. Enhanced Fujita Scale

EF Number	Estimated 3-second gust (mph)	Typical Damage
0 (Gale)	65–85	Some damage to chimneys; branches broken off trees; shallow-rooted trees blown over; damaged signboards.
1 (Weak)	86–110	Surfaces peeled off roofs; mobile homes pushed off foundations or overturned; autos pushed off roads.
2 (Strong)	111–135	Roofs torn off frame houses; mobile homes demolished; boxcars pushed over; large trees snapped or uprooted; light object missiles generated.
3 (Severe)	136–165	Roof and some walls torn off well-constructed houses; trains overturned; most trees in forests uprooted. Well-constructed houses leveled; structures with weak foundations blown off, sometimes to a distance; cars flung about and large missiles generated.
4 (Devastating)	166–200	Well-constructed houses leveled; structures with weak foundations blown off some distance; cars flung about and large missiles generated.
5 (Incredible)	200+	Strong frame houses lifted off foundations and carried considerable distances to disintegrate; automobile-sized missiles flying through the air more than 100 meters; trees debarked; steel-reinforced concrete structures badly damaged.

Benton, Linn, Marshall, and Tama counties have experienced 44 instances of tornadoes over the past 10 years (see Table 42 below). One tornado in Marshall County in 2018 was classified as EF3, Severe, on the Enhanced Fujita scale. It caused nearly \$200 million in property damage and caused 22 direct injuries.

Table 42. Tornadoes in Benton, Linn, Marshall, and Tama Counties with Injuries and Property Damage, 2012–2022

County	Location	Date	Magnitude	Injuries	Property Damage
Marshall	Marietta	7/19/2018	EF3	22	\$200,000,000
Linn	Fairfax	7/17/2016	EF2	4	\$250,000
Marshall	St. Anthony	6/30/2014	EF1	0	\$150,000
Tama	Traer	6/30/2014	EF2	0	\$150,000
Marshall	Bangor	6/30/2014	EF0	0	\$50,000

¹² NOAA, [The Enhanced Fujita Scale](#).

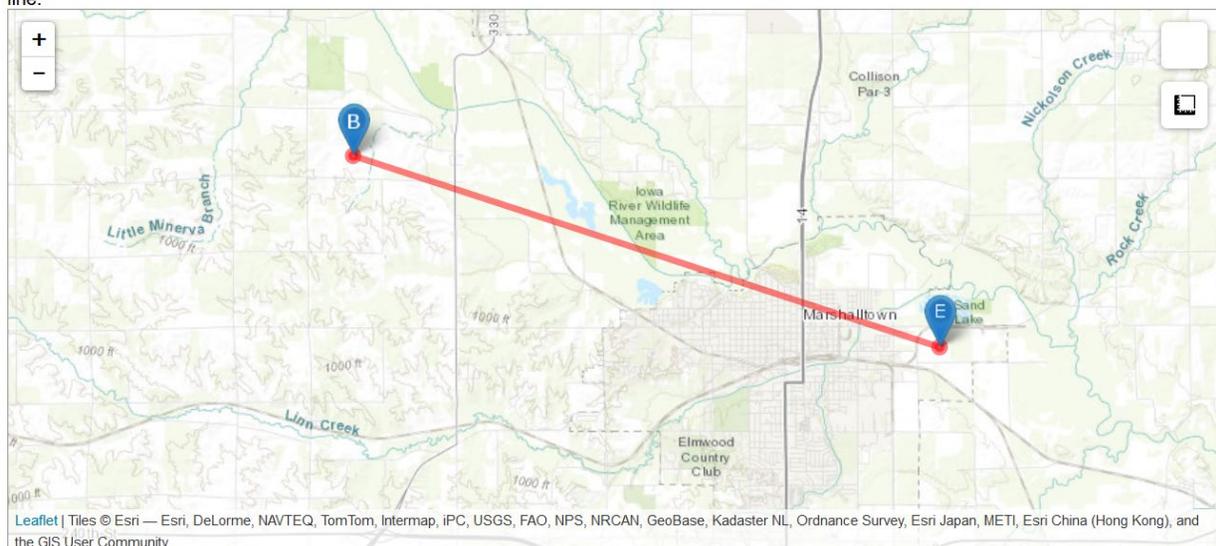


Linn	Covington	9/03/2018	EF1	0	\$35,000
Tama	Buckingham	7/06/2014	EF1	0	\$25,000
Benton	Norway	7/17/2016	EF1	0	\$25,000
Tama	Dysart	7/14/2021	EF1	0	\$25,000
Marshall	Marietta	8/10/2020	EF1	0	\$20,000
Marshall	Pickering	11/11/2015	EF0	0	\$1,000
Linn	Alburnett	9/25/2018	EF1	0	\$1,000
Benton	Vinton	7/17/2016	EF2	5	0
Linn	Central City	6/28/2017	EF2	1	0
Linn	Beverly	4/07/2021	EF0	1	0

Figure 8. Event Path, Marietta EF3 Tornado Event, July 19, 2018

Event Map:

Note: The tornado track is approximate based on the beginning (B) and ending (E) locations. The actual tornado path may differ from a straight line.



Certain populations, such as those with residents who live in mobile homes, are more vulnerable to impacts from tornadoes. The 2020 ACS estimate for Benton, Linn, Marshall, and Tama counties of mobile home units is 4,363, or nearly 3.5% of the occupied housing units. Residents living in these units will need additional assistance in finding shelter during tornado events.

Tornadoes may become more frequent or severe due to climate change. Higher temperatures and humidity may increase the atmospheric instability associated with the generation of severe thunderstorms and tornadoes. However, vertical wind shear also could decrease, resulting in fewer or weaker severe thunderstorms and tornadoes.



2.5.1.2 Flash Flood

A flash flood is an event that occurs with little or no warning where water levels rise at an extremely fast rate. Flash flooding results from intense rainfall over a brief period, sometimes combined with rapid snowmelt, ice jam release, frozen ground, saturated soil, or impermeable surfaces. Most flash flooding is caused by slow-moving thunderstorms or thunderstorms repeatedly moving over the same area. Even with information on soil saturation and predicted rainfalls, flash floods can still catch people by surprise. Flash flooding is an extremely dangerous form of flooding that can reach full peak in only a few minutes and allows little or no time for protective measures to be taken by those in its path. Flash flood waters move at very fast speeds and can move boulders, tear out trees, scour channels, destroy buildings, and obliterate bridges. Flash flooding often results in higher loss of life, both human and animal, than slower developing river and stream flooding.

A flash flood event can impact areas far from a tributary or body of water. Streets can become swift moving rivers, and basements can become deathtraps because flash floods can fill them with water in minutes. Nearly half of all flash flood fatalities are automobile related. Motorists often try to traverse water-covered roads and bridges and are swept away by the current. Recreational vehicles and mobile homes located in low-lying areas also can be swept away by water.

Buildings, infrastructure, and land can be eroded, extensively damaged, or completely destroyed in a flood event. Disruption or complete shutdown of essential facilities and services, such as major travel routes, water distribution, and wastewater treatment facilities, often occurs during severe flood events. Depending on the severity, overall disruption may occur for just a few hours, causing minor inconveniences, or up to months, causing major environmental and economic impacts in the county and State.

FEMA has identified and mapped areas of flood risk on Flood Insurance Rate Maps (FIRMs), with the highest risk zones called Special Flood Hazard Areas (SFHAs).¹³ The 100-year floodplain is considered a high-risk area and is denoted as Zone A. The 500-year floodplain is shown by the notation Zone C or Zone X. The areas between the 100-year and 500-year floodplains are shown using Zone B and Zone X. In addition, high-risk coastal areas are denoted as Zone V. This information is shown in Table 43.

Table 43. FEMA-Designated Flood Zones

Zone	Description
Low- to Moderate-Risk Areas	
C and X (Unshaded)	Area of minimal flood hazard usually depicted on FIRMs as above the 500-year flood level. Zone C may have ponding and local drainage problems that do not warrant a detailed study or designation as a base floodplain. Zone X is the area determined to be outside the 500-year floodplain and protected by a levee from the 100-year flood.

¹³ [FEMA Flood Zones – Glossary.](#)

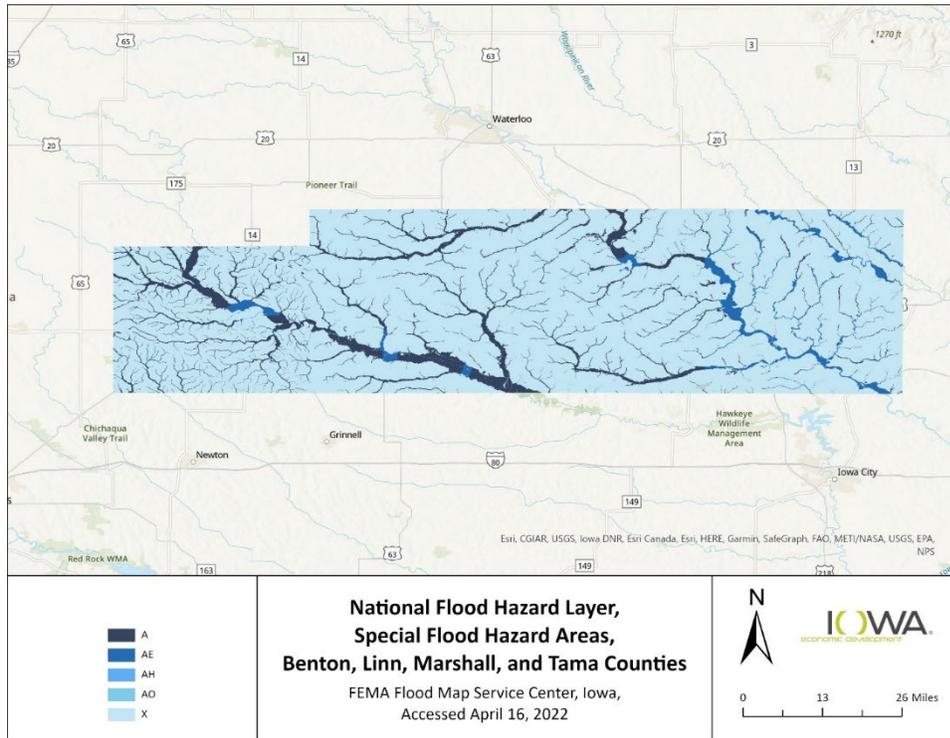


Zone	Description
B and X (Unshaded)	Area of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods. Zone B also is used to designate base floodplains of lesser hazards, such as areas protected by levees from 100-year floods, or shallow flooding areas with average depths of less than 1 foot or drainage areas of less than 1 square mile.
High-Risk Areas	
A	Areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. Because detailed analyses are not performed for such areas, no depths or base flood elevations are shown within these zones.
AE	The base floodplain where base flood elevations are provided.
AH	Areas with a 1% annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Base flood elevations derived from detailed analyses are shown at selected intervals within these zones.
AO	
High-Risk Coastal Areas	
V	Coastal areas with a 1% or greater chance of flooding and an additional hazard associated with storm waves. These areas have a 26% chance of flooding over the life of a 30-year mortgage. No base flood elevations are shown within these zones.
Undetermined Risk Areas	
D	Areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk.

Flash flooding can occur in many areas of Linn and Marshall counties. Certain areas have a greater potential to be affected due to factors such as low elevation, nearby waterways, insufficient stormwater management, intense urban or agricultural development, and so forth. SFHAs can be found in Figure 9.



Figure 9. Special Flood Hazard Areas – Benton, Linn, Marshall, and Tama Counties



Benton, Linn, Marshall, and Tama counties have experienced 44 flash flood events over the past 10 years, resulting in one injury and one death during a heavy rain event on June 30, 2014, when two teenage boys were swept into a large storm sewer. Flash floods have caused more than \$1.46 million in property damage across the four counties. Further details can be found in Table 44.

Table 44. Flash Flood Events in Benton, Linn, Marshall, and Tama Counties with Deaths, Injuries, or Property Damage, 2012–2021

County	Location	Event Date	Deaths	Injuries	Property Damage
Tama	Traer Municipal Airport	5/29/2013	0	0	\$450,000
Linn	Walker	4/17/2013	0	0	\$250,000
Marshall	Luray	5/26/2013	0	0	\$250,000
Marshall	Luray	5/29/2013	0	0	\$200,000
Marshall	Haverhill	5/26/2013	0	0	\$100,000
Marshall	Quarry	6/30/2014	0	0	\$50,000
Marshall	Liscomb	6/15/2019	0	0	\$50,000
Marshall	St. Anthony	5/26/2013	0	0	\$25,000
Marshall	Clemons	5/26/2013	0	0	\$25,000
Marshall	Marshalltown Airport	5/26/2013	0	0	\$20,000
Marshall	Dunbar	9/02/2018	0	0	\$20,000
Tama	Traer Municipal Airport	9/01/2018	0	0	\$10,000
Marshall	Rhodes	5/25/2013	0	0	\$5,000
Linn	Hiawatha	9/08/2016	0	0	\$1,000
Linn	Cedar Rapids	9/23/2016	0	0	\$1,000
Linn	Cedar Rapids	6/30/2014	1	1	0

The 2010 Climate Change Impacts on Iowa report notes that there is a trend toward more frequent intense rainfall events. If this trend continues, flash flooding events and associated impacts will likely occur more often in Iowa. The frequency of 2-inch extreme precipitation events has increased, with the highest number occurring during the past 16 years.¹⁴

2.5.1.3 River Flood

A river flood is a temporary condition of partial or complete inundation of normally dry land areas from the overflow of stream banks. Flooding results when the flow of water is greater than the normal carrying capacity of the stream channel. Floodwaters can be extremely dangerous; the force of 6 inches of swiftly moving water can knock people off their feet and 2 feet of water can float a car. Floods can be slow- or fast-rising but generally develop over a period of days.

¹⁴ [National Climate Summaries: Iowa.](#)



Flooding is a natural and expected phenomenon that occurs annually, usually restricted to specific streams, rivers, or watershed areas.

River flooding also can be caused by ice jams. Ice jam flooding generally occurs when warm weather and rain break up frozen rivers or any time there is a rapid cycle of freezing and thawing. The broken ice floats downriver until it is blocked by an obstruction such as a bridge or shallow area, where an ice jam forms, blocking the channel and causing flooding upstream.

River flooding does not have as high of a risk to humans as does flash flooding, mostly because of the slow onset of river flooding. People in a flood zone, downstream from a dam or levee, or in low-lying areas are especially vulnerable in any type of flood event. In addition, people located in areas with narrow stream channels, saturated soil, or on land with large amounts of impermeable surfaces are likely to be impacted in the event of a significant rainfall.

Thousands of miles of rivers flow through Iowa, which is bordered by the Mississippi River to the east and the Big Sioux and Missouri rivers to the west.¹⁵ With many of these waterways located alongside cities and farmland, flooding is a severe hazard. From 1955 to 1997, Iowa was ranked first in State losses due to flooding. During the first 2 weeks of June 2008, heavy rainfall on soil already saturated from unusually wet conditions caused record flooding along multiple rivers. Numerous long-term stations reported more than 10 inches during the 2-week period, and levels on the Cedar River, which runs through Benton, Linn, and Tama counties, exceeded the previous record by more than 11 feet. Of the State's 99 counties, 83 were declared disaster areas, and damages were estimated at almost \$10 billion.

Benton, Linn, Marshall, and Tama counties have experienced 39 flood events over the past 10 years, resulting in \$5.9 million in property damages (see Table 45). A 2016 flood in Linn County caused the Cedar River to crest to 22 feet, 6 feet above the major flood stage level. It was the second-highest crest on record for the location.¹⁶ More than 100 buildings and homes were impacted by the flooding, resulting in \$2.2 million in property damages; dozens of blocks were closed off due to temporary barriers related to the flooding for a few to several days; and local agencies reported that 27 roads were closed across the county. Roughly 100 homes were evacuated in Palo, a community near Cedar Rapids along the Cedar River. All bridges, except for the I-380, were closed and all schools in Cedar Rapids were closed for 3 days.

¹⁵ [Ibid.](#)

¹⁶ [NOAA, National Centers for Environmental Information \(NCEI\), Storm Events Database.](#)



Table 45. Flood Events in Benton, Linn, Marshall, and Tama Counties with > \$50,000 in Property Damages, 2012–2021

County	Location	Date	Property Damage
Linn	Covington	9/26/2016	\$2,200,000
Marshall	St. Anthony	3/14/2019	\$2,000,000
Tama	Dysart	6/23/2020	\$400,000
Marshall	Minerva	5/26/2013	\$250,000
Marshall	Marshalltown	8/30/2015	\$250,000
Marshall	St. Anthony	3/14/2019	\$200,000
Tama	Lincoln	3/15/2019	\$200,000
Marshall	St. Anthony	12/14/2015	\$100,000
Benton	Mt. Auburn	9/25/2016	\$100,000
Tama	Montour	9/04/2018	\$100,000
Marshall	Marshalltown	12/14/2015	\$50,000
Marshall	Dunbar	9/02/2018	\$50,000

The 2010 Climate Change Impacts on Iowa report notes that there is a trend toward more frequent intense rainfall events. Although very heavy precipitation does not always result in river flooding, it can occur when the very heavy precipitation occurs frequently without enough time for the watershed to drain properly. The frequency of 2-inch extreme precipitation events has increased, with the highest number occurring during the past 16 years (Figure 10).¹⁷ Increases in precipitation are projected for Iowa, most likely during the winter and spring. Increases in the frequency and intensity of extreme precipitation are also projected, potentially increasing the frequency and intensity of floods (Figure 11).¹⁸

¹⁷ [National Climate Summaries: Iowa](#).

¹⁸ Ibid.



Figure 10. Observed Number of 2-Inch Extreme Precipitation Events

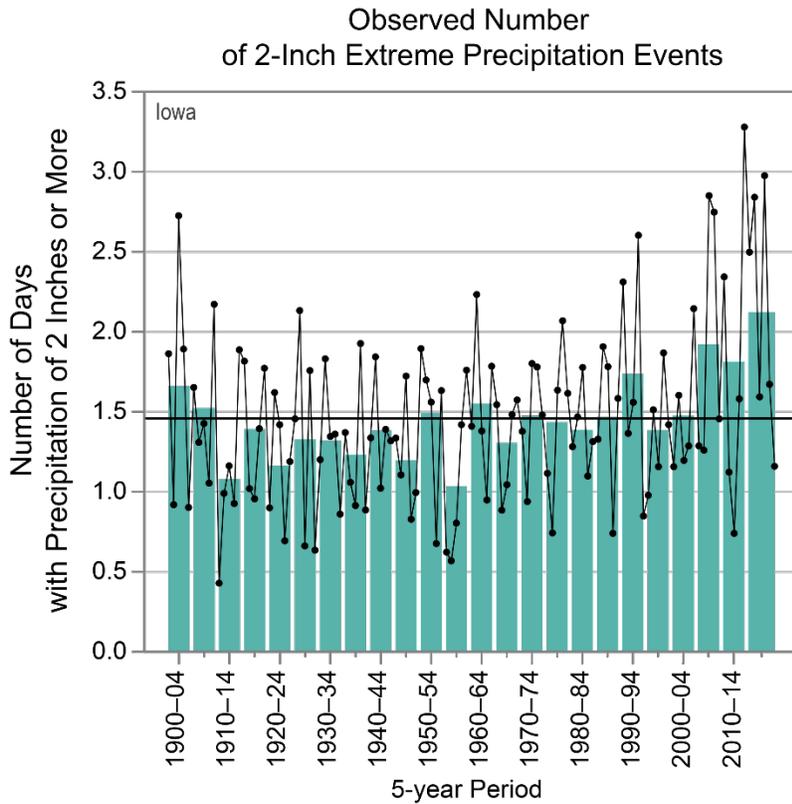
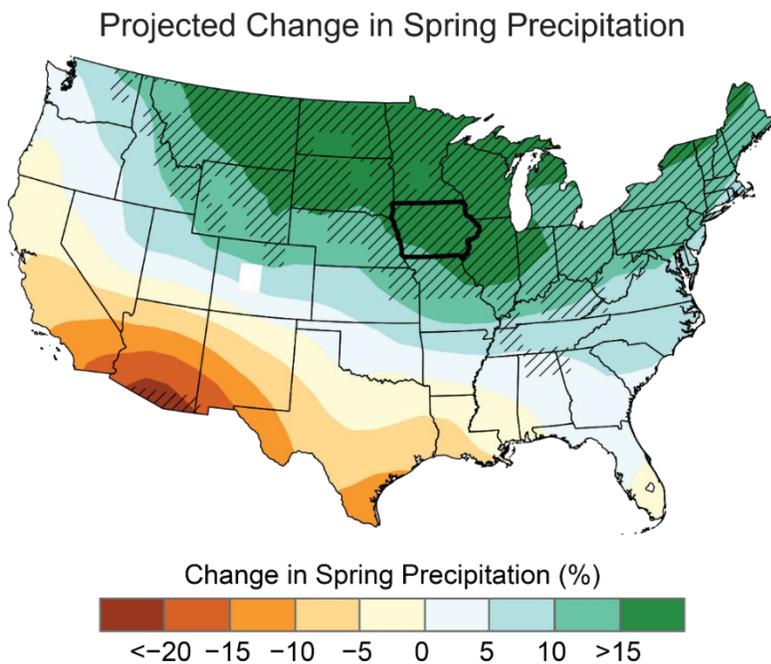


Figure 11. Projected Change in Precipitation

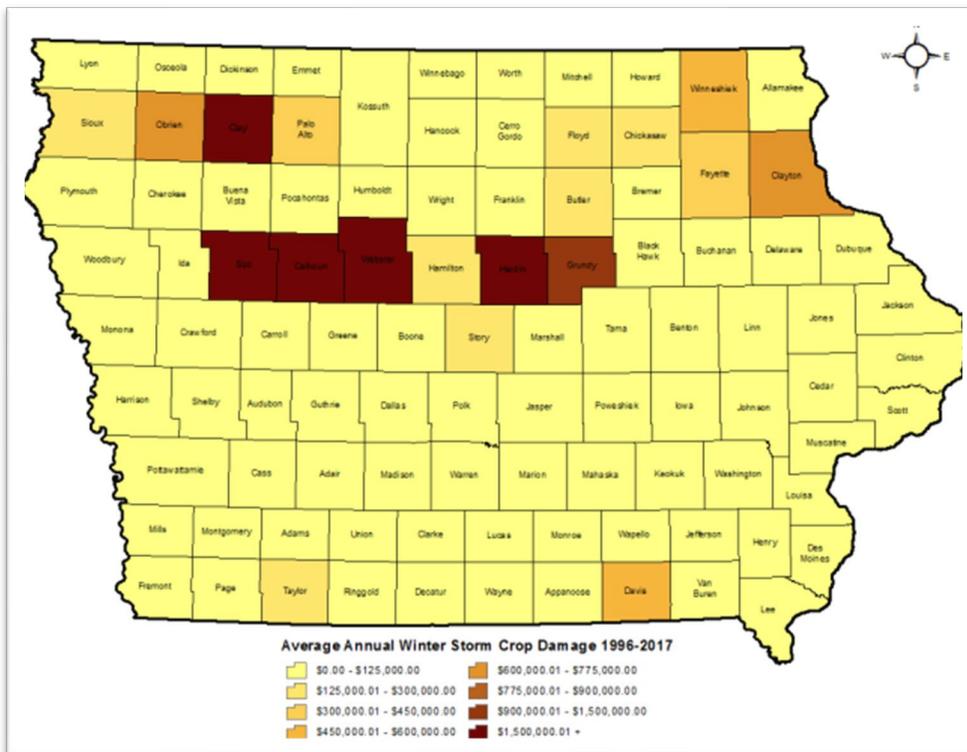


2.5.1.4 Severe Winter Storm

In the Midwest, winter storms usually occur when cold Arctic air from Canada meets warmer, moist air from the Gulf of Mexico, producing heavy snow and sometimes blizzard conditions. Severe winter storms can be characterized by heavy and/or blowing snow, freezing rain, sleet, and extreme cold. Winter storms usually occur between October and April and can cause considerable damage, with heavy snow immobilizing transportation systems, downing trees and power lines, collapsing buildings, and resulting in crop and livestock losses.

Blizzards are winter storms lasting at least 3 hours with sustained wind speeds exceeding 35 mph, visibility of 0.25 mile or less, and white-out conditions. When heavy snow or freezing accumulates in excess of 6 inches in a 12-hour period or 0.25 inch, respectively, it can disrupt the flow of vital supplies and disrupt emergency and medical services. Severe ice storms also can result in electric power loss to large areas of Iowa, impeded emergency assistance, and stranded motorists.

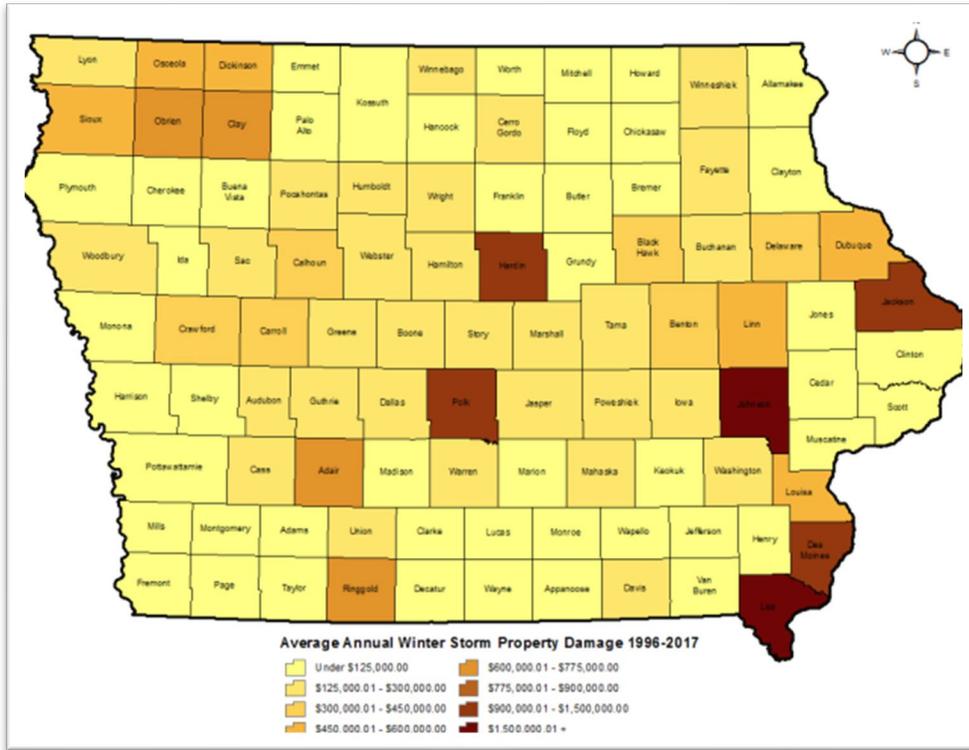
Figure 12: Iowa Winter Storm Crop Damage, 1996–2017¹⁹



¹⁹ NOAA, NCEI.



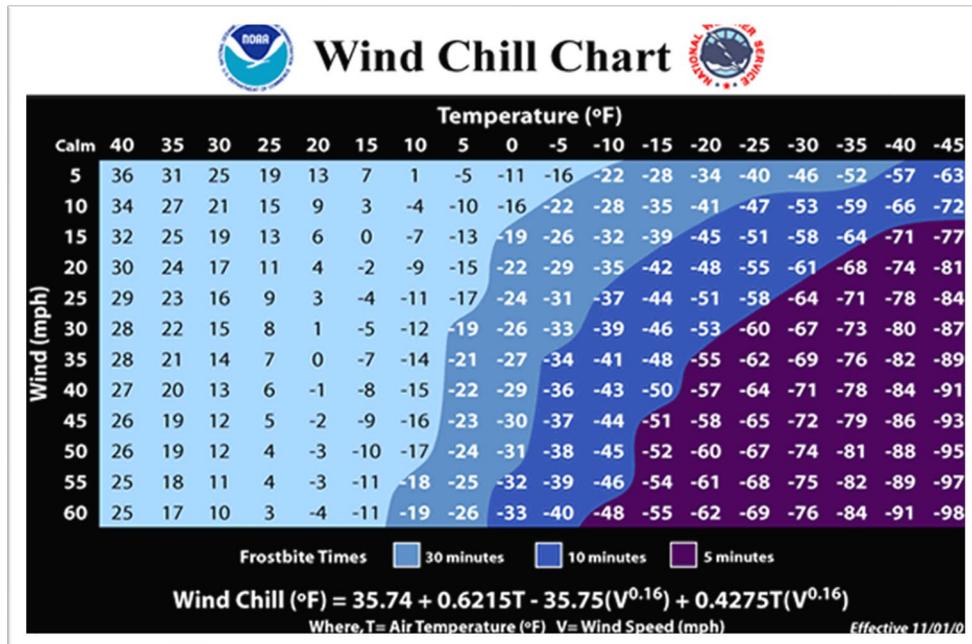
Figure 13: Iowa Winter Storm Property Damage, 1996–2017²⁰



The frigid temperatures and wind chills associated with severe winter storms also are dangerous to people, particularly children and the elderly, sometimes resulting in hypothermia, frostbite, and in rare cases, death. Such temperatures also can freeze pipes and kill livestock, fish, wildlife, and pets. The figure below illustrates the frostbite potential relative to the duration of bare skin exposure.

²⁰ Ibid.

Figure 14. National Oceanic and Atmospheric Administration Wind Chill Chart²¹



From 2013 to 2017, Iowa experienced 50 winter weather events, including 23 winter storms, nine blizzards, four ice storms, 20 heavy snow events, and 17 extreme cold events, some of which overlapped. Since 1991, Iowa has had eight severe winter storm-related presidentially declared major disasters, as depicted in the table below.

Table 46: Number of Iowa Counties Impacted by Various Disaster Events

Date/Event	Counties Impacted	Description/Damage
1991, Ice Storm	16	Extensive damage to power lines, including the collapse of numerous high-tension towers in north-central Iowa.
1997, Severe Winter Storm	13	
2007, Severe Winter Storm	48	Up to 16 inches of snow, combined with strong winds gusting to 50–55 mph, causing blizzard conditions. 250,000+ without electricity for more than 10 days.
2007, Severe Winter Storm	23	
2008, Severe Winter Storm	30	
2010, Severe Winter Storm	27	
2013	5	

²¹ National Weather Service, Wind Chill Chart.



2.5.1.5 Thunderstorms, Lightning, and Hail

Thunderstorms can be dangerous by themselves and can cause destructive, deadly flooding. When storms contain strong winds, hail, and tornadoes, they can turn violent. The National Oceanic and Atmospheric Administration (NOAA) classifies a storm as “severe” when it produces wind gusts of at least 58 mph and/or hail 1 inch in diameter (about the size of a quarter) or larger, and/or a tornado. Iowa averages 40 to 50 thunderstorms each year.²²

Thunderstorms vary in type depending on size and organization. NOAA classifies thunderstorms by cells, or convection in the form of a single updraft, downdraft, or updraft/downdraft couplet, typically seen as a vertical dome or tower as in a towering cumulus cloud.²³

- Ordinary cell thunderstorms only have one cell. These storms also may be referred to as single-cell thunderstorms or pulse thunderstorms.
- Multi-cell cluster thunderstorms are organized in clusters of two to four short-lived cells.
- Multi-cell line thunderstorms form in a line that extends sometimes for hundreds of miles and can persist for hours. These are called squall lines and they can be continuous or include contiguous precipitation.
- Long-lived squall lines are called derechos and can cause severe damage with fast straight-line winds.
- Supercell thunderstorms are very dangerous storms with long-lived, strong tornadoes and damaging wind, hail, and flash floods.

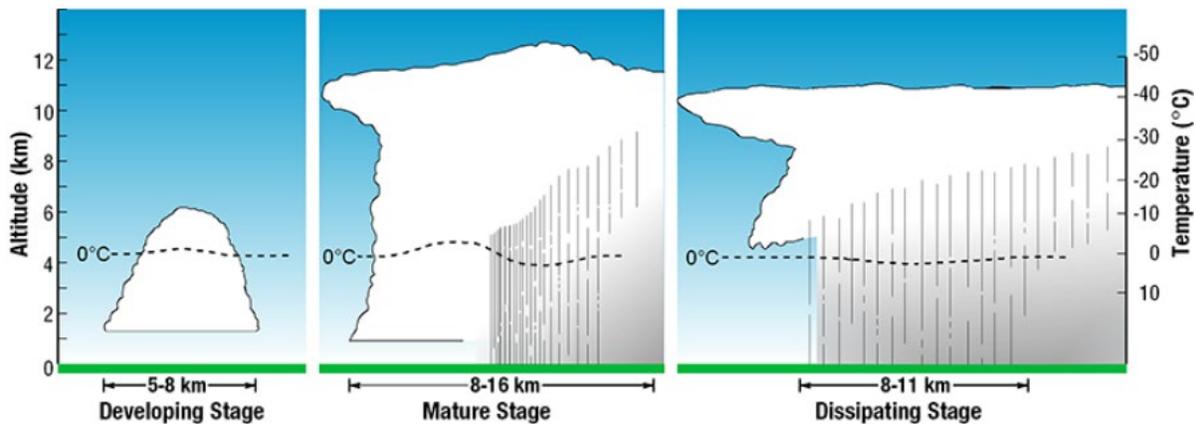
Thunderstorms form due to three conditions: moisture, rising unstable air (air that keeps rising when given a nudge), and a lifting mechanism to provide the “nudge.” Thunderstorms have three stages in their life cycle—the developing stage, the mature stage, and the dissipating stage. The developing stage of a thunderstorm is marked by a cumulus cloud that is being pushed upward by a rising column of air (updraft). There is little to no rain during this stage but there is occasional lightning. The thunderstorm enters the mature stage when the updraft continues to feed the storm but precipitation begins to fall out of the storm, creating a downdraft (a column of air pushing downward). When the downdraft and rain-cooled air spreads out along the ground, it forms a gust front or a line of gusty winds. The mature stage is the most likely time for hail, heavy rain, frequent lightning, strong winds, and tornadoes. Eventually, a large amount of precipitation is produced and the updraft is overcome by the downdraft, starting the dissipating stage.

²² [Iowa State University, Thunderstorm Climatology.](#)

²³ [NOAA National Severe Storms Laboratory, Severe Weather 101.](#)



Figure 15. Severe Storm Life Cycle²⁴



Severe storms can have significant impacts on infrastructure. Lightning strikes can cause infrastructure and tree damage, start fires, and pose a threat to human life. Damage from hail increases with the size of the hail and can cause damage to vehicles, aircraft, and homes, and can be fatal to people and livestock. While most buildings are built to Iowa Building Code standards to remain structurally sound in up to 105-mph wind speeds, and most storms do not have strong enough wind speeds to cause significant damage, there have still been instances of structural damage due to wind. In addition, flooding from precipitation can cause significant property damage.

Since 2012, there have been more than 484 events in Benton, Linn, Marshall, and Tama counties with hail larger than an inch, lightning, or thunderstorm winds, resulting in four direct deaths, 105 direct injuries, and more than \$1.467 million in property damage.²⁵ Events resulting in injuries, death, or more than \$50,000 in damage can be found in Table 47.

In addition, derechos have caused devastating damage across the counties. In August 2020, a powerful line of severe thunderstorms produced a derecho that tracked across eastern Iowa and northwest Illinois, resulting in widespread straight-line wind damage.²⁶ The cost of the damage from this storm was extreme, reaching an estimated \$7.5 billion along the path of these storms from Iowa through Illinois. The most extreme winds, estimated at 110–140 mph, destroyed or damaged numerous outbuildings, barns, grain bins, homes, mobile homes, apartment buildings, trees, and power poles in parts of Benton, Linn, Jones, Cedar, and Clinton counties. The Cedar Rapids area was particularly hard hit. One fatality occurred in Linn County as a tree fell on a cyclist. In addition to the damage, numerous long-duration power outages occurred across the region. In a July 2011 Benton County incident, a derecho had sustained winds of more than

²⁴ [Ibid.](#)

²⁵ <https://www.ncdc.noaa.gov/stormevents/>.

²⁶ [NOAA, Storm Event Database, 2020 Derecho.](#)



130 mph for 30 minutes. The path of the storm was 10 miles wide across the 24-mile width of the county.

Table 47. Severe Storms with Injuries, Deaths, and/or > 50,000 Damage, 2012–2021, Linn and Marshall Counties

County	Beginning Location	Date of Occurrence	Event Type	Magnitude	Direct Deaths	Direct Injuries	Property Damage
Benton	Walford	12/15/2021	Thunderstorm Wind	70 knots	1	0	0
Linn	Marion Evans Airport	6/30/2014	Thunderstorm Wind	87 knots	0	0	\$200,000
Linn	Mt. Vernon	9/07/2012	Lightning		0	0	\$50,000
Linn	Covington	8/10/2020	Thunderstorm Wind/Derecho	122 knots	1	100	0
Linn	Fairfax	6/30/2014	Thunderstorm Wind	72 knots	1	1	0
Linn	Palo	6/20/2015	Lightning		1	0	0
Linn	Cedar Rapids	6/30/2014	Thunderstorm Wind	72 knots	0	4	0
Marshall	Marshalltown	6/27/2014	Thunderstorm Wind	65 knots	0	0	\$200,000
Marshall	Liscomb	6/30/2014	Thunderstorm Wind	65 knots	0	0	\$100,000
Marshall	Marshalltown	5/17/2017	Thunderstorm Wind	61 knots	0	0	\$100,000
Marshall	Marshalltown	5/16/2019	Hail	1.5 knots	0	0	\$100,000
Marshall	Le Grand	4/18/2015	Thunderstorm Wind	61 knots	0	0	\$50,000
Tama	Chelsea	9/19/2013	Thunderstorm Wind	54 knots	0	0	\$50,000
Benton	Belle Plaine Municipal Airport	8/10/2020	Thunderstorm Wind/Derecho	126 knots	0	0	–
Marshall	Marshalltown	8/10/2020	Thunderstorm Wind/Derecho	87 knots	0	0	–
Tama	Toledo/Elberon	8/10/2020	Thunderstorm Wind/Derecho	87 knots	0	0	–

Thunderstorms will potentially become more intense and severe as climate change creates conditions that are conducive to thunderstorm formation, with warmer surface temperatures and more moisture in the air due to increased evaporation. Measured increases in humidity will likely continue to fuel convective thunderstorms in Iowa.²⁷

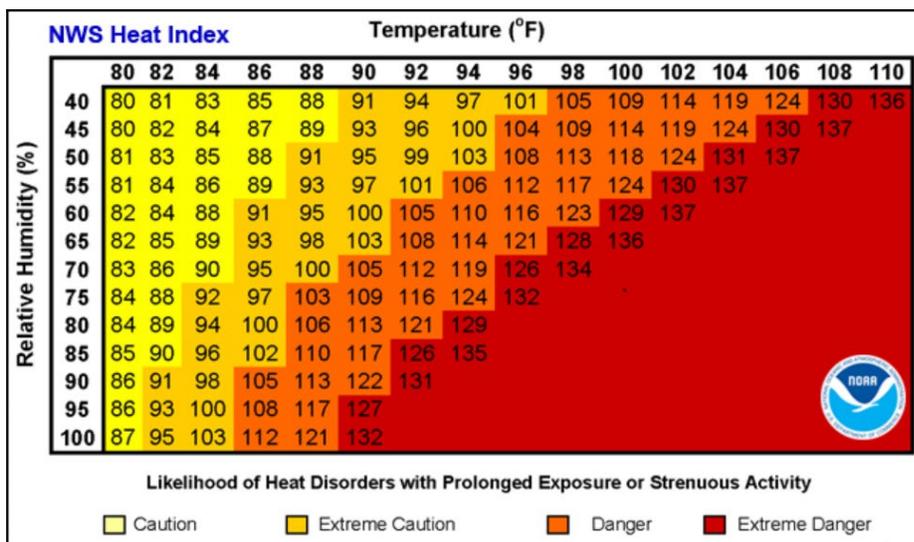
²⁷ Iowa Department of Natural Resources, Climate Change.



2.5.1.6 Extreme Heat

Conditions for extreme heat are defined by summertime weather that is substantially hotter and/or more humid than average for a location at that time of year. This includes temperatures (including heat index) in excess of 100°F or at least three successive days of 90+°F. The heat index is a number in degrees Fahrenheit that tells how hot it really feels when relative humidity is factored into actual air temperature. Exposure to full sunshine can increase the heat index by at least 15°F. Figure 16 shows the heat index values when both humidity and temperature are considered. It also shows the likelihood of heat disorders with prolonged exposure to or strenuous activity under such conditions.

Figure 16. National Weather Service Heat Index



Under extreme heat conditions, the National Weather Service can issue either a heat advisory or an excessive heat warning. A heat advisory is issued when a heat index of 100°F or higher is expected for a period of 3 hours or more. An excessive heat warning is used when a heat index of 105°F or higher is expected for a period of 3 hours or more.

Extreme heat can impose stress on humans and animals. Exposure to heat can lead to a variety of adverse health impacts, ranging from cramps to death.²⁸ Heat exhaustion is a relatively common reaction to excessive heat and can include symptoms such as headaches, dizziness, and fainting. If exposure is prolonged, heatstroke can occur. This reaction is more severe and requires medical attention. Deaths from heat exposure typically occur in individuals with pre-existing conditions, frequently those with heart conditions.

²⁸ [Union of Concerned Scientists, Heat Waves and Climate Change.](#)



There are certain demographic groups that are particularly vulnerable to adverse health impacts from extreme heat events.²⁹ Very young children, seniors, and populations with physical and psychiatric medical conditions are more vulnerable to health impacts from heat events than the general population. In addition, people of color and low-income residents are at greater risk from adverse health impacts from extreme heat.

Urban areas also are particularly at risk because of air stagnation and large quantities of heat-absorbing materials such as streets and buildings. Extreme heat also can result in distortion and the failure of structures and surfaces such as roadways and railroad tracks.

There have been eight heat and extreme heat events in Benton, Linn, Marshall, and Tama counties over the past 10 years (Table 48). In 2020 alone, Benton, Linn, Marshall, and Tama counties had more than 119 heat-related emergency department visits (see Figure 17).³⁰

Table 48. Heat and Excessive Heat Events – Benton, Linn, Marshall, and Tama Counties, 2012–2021

County	Date	Event Type
Linn	7/04/2012	Excessive Heat
Benton	7/04/2012	Excessive Heat
Benton	8/26/2013	Heat
Linn	8/26/2013	Heat
Marshall	7/20/2016	Excessive Heat
Tama	7/20/2016	Excessive Heat
Marshall	7/18/2019	Excessive Heat
Tama	7/18/2019	Excessive Heat

²⁹ Ibid.

³⁰ [Iowa Public Health Tracking Portal, Heat-Related Illness ED Visits Data.](#)



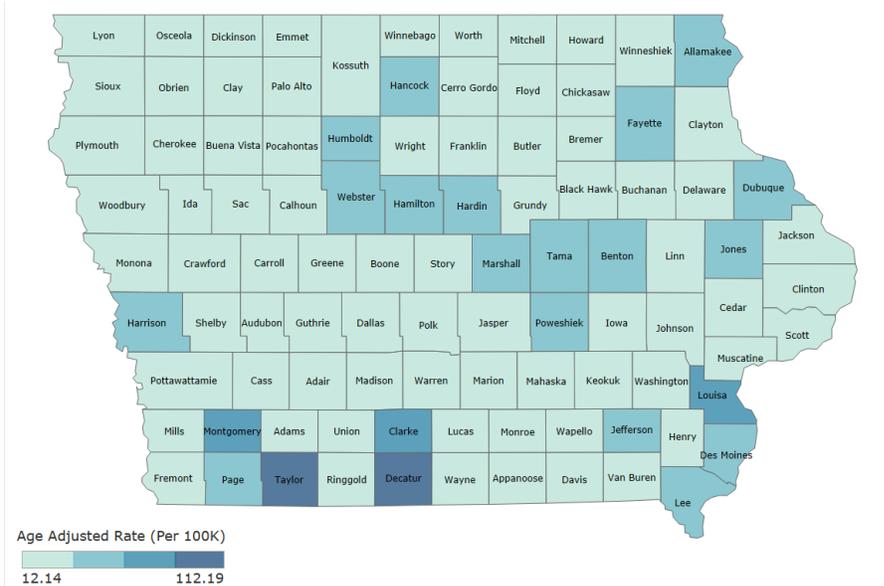
Figure 17. Map of Heat-Related Emergency Department Visits by County, Iowa, 2020

Emergency Department (ED) Visits for Heat Illness - 2020

May through September

Hover over a County to see the County Name and values for that County.

Clicking on a County will show the values for that County in the lower right.

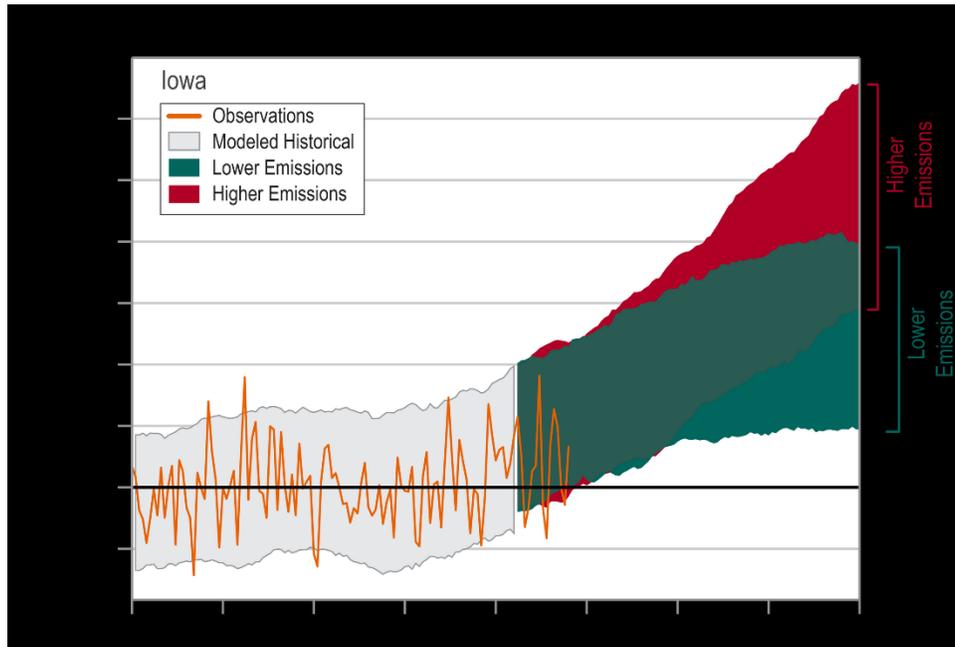


Climate change is projected to increase the frequency, duration, and severity of extreme heat events in Iowa. Temperatures in Iowa have risen more than 1°F since the beginning of the 20th century.³¹ Temperatures in the 2000s have been higher than in any other historical period, with the exception of the Dust Bowl drought in the early 1930s. Under a higher emissions pathway, historically unprecedented warming is projected during this century (Figure 18). Even under a lower emissions pathway, annual average temperatures are projected to most likely exceed historical record levels by the middle of this century. However, a large range of temperature increases is projected under both pathways, and under the lower pathway, a few projections are only slightly warmer than historical records. Intense heatwaves can occur in Iowa, often accompanied by high humidity. Heatwaves are projected to become more intense, and impacts on human health could be significant.

³¹ [National Climate Summaries: Iowa.](#)



Figure 18. Observed and Projected Temperature Change, Iowa³²



2.5.2 Indispensable Services

Indispensable services are those that enable the continuous operation of critical business and government functions and/or are critical to human health and safety and economic security. As part of the EHMP, the State of Iowa Department of Homeland Security and Emergency Management (HSEMD) defined and quantified such critical facilities that would be needed during or immediately after a natural disaster.

In Benton County, HSEMD identified 34 facilities as “critical assets.” The Benton County Multi-Jurisdictional Hazard Mitigation Plan includes 15 different municipalities, each with its own community profile that identifies the facilities deemed essential to the health and welfare of their residents. Atkins, for example, identified 23 such facilities, including, Atkins City Hall, Atkins Fire Stations, and three emergency shelters, as well as County Road E-44, seven utility systems, two schools, one senior center, one financial institution, two grocery stores, one hardware store, one gas station, and two healthcare facilities.

Marshall County invited each of the 18 municipalities that participated in its multi-jurisdictional hazard mitigation planning process to identify what they deemed to be “community assets,” including critical facilities such as shelters, police stations, and hospitals, as well as other infrastructure, buildings, and institutions they determined necessary to protect from “the harmful impacts of hazard events,” such as utilities, grocery stores, and banks. Taken together, the community identified 482 such services.

³² Ibid.



Likewise, Tama County identified 605 facilities that they characterized as “essential in providing utility or direction either during the response to an emergency or during the recovery operation” and organized them according to FEMA’s Seven Lifelines, which are Communication; Energy; Food, Water, Shelter; Hazardous Material; Health and Medical; Safety and Security; and Transportation. Each of the 13 jurisdictions participating in the plan had at least one such service in their area representing at least one lifeline, with some jurisdictions having as many as 447 services across six different lifelines.

As part of the EHMP, HSEMD also identified State facilities within the SFHA, as shown below.

Figure 19: State Facilities in a Special Flood Hazard Area, 2017

County	No. of Facilities	Building Cost	Content Cost
Linn	2	\$74,600	\$400
Tama	2	\$150,000	\$100

2.5.3 Conclusion

As this Mitigation Needs Assessment makes clear, there are at least six natural hazards that pose a considerable risk to Linn, Benton, Marshall, and Tama counties, those counties most impacted and distressed by the 2020 Midwest Derecho event. By characterizing these hazards in terms of their frequency and each county’s vulnerability, IEDA and its subrecipients can draw on this needs assessment to identify current and future hazards in their communities and target CDBG-DR funds toward cost-effective solutions to mitigate them over the long term. In addition, this assessment will inform all CDBG-DR programs and activities undertaken as part of this allocation such that, at a minimum, they do not exacerbate hazards but rather serve to lessen their impacts.



3. General Requirements

3.1 Citizen Participation

3.1.1 Outreach and Engagement

In the development of this disaster recovery action plan, IEDA conducted a survey of various communities and organizations that assessed the damages suffered by the derecho, the challenges of receiving assistance after the storm, and the current needs of those communities that still required assistance. The survey identified a need for more affordable single family and multifamily housing, tree planting to restore the urban tree canopy and natural habitat in certain areas, and a solution to a prolonged loss of power during and after the storm.

IEDA also consulted with disaster-affected residents, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure the consistency of disaster impacts identified in the plan, and that the plan and planning process were comprehensive and inclusive.

Through these consultation meetings, IEDA was able to gather data, experiences, and community insight to develop an initial unmet needs assessment. All engagements were conducted virtually and surveys were submitted by each city and community organization. Below are the consultation events held to date.

Figure 20: Consultation Events Held to Date

Date	Attendees
February 16, 2022	Linn and Benton counties, East Central Iowa Council of Governments (ECICOG)
March 10, 2022	City of Cedar Rapids
March 22, 2022	City of Springville and ECICOG
March 22, 2022	City of Ely and ECICOG
March 22, 2022	City of Marion and ECICOG
March 22, 2022	City of Palo and ECICOG
March 22, 2022	City of Lisbon and ECICOG
March 22, 2022	City of Bertram and ECICOG
March 23, 2022	Linn County and ECICOG
March 28, 2022	City of Central City and ECICOG
March 30, 2022	City of Mount Vernon and ECICOG
March 30, 2022	City of Hiawatha and ECICOG
April 6, 2022	City of Fairfax and ECICOG
April 7, 2022	Iowa Legal Aid – Disaster Recovery and ECICOG
April 12, 2022	Catherine McAuley Center, Cedar Rapids
April 14, 2022	Lemi Tilahun, Refugee and Immigrant Advocate
April 14, 2022	Catherine McAuley Center, Cedar Rapids, in-person refugee & staff engagement
April 14, 2022	United We March Forward, Cedar Rapids, in-person refugee engagement





April 28, 2022	Region 6 Council of Governments
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IEDA recognizes that affected stakeholders are at the center of, and partners in, the development and implementation of this plan. IEDA has published this Action Plan on the [2020 CDBG-DR Derecho Recovery website](#) for a 30-day public comment period. Citizens will be notified through postings in select newspapers. IEDA will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency.

A summary of citizen comments on this Action Plan, along with IEDA responses is included in [Appendix 5.3](#) of this document.

The Public Comment Period for this Action Plan was May 5, 2022 – June 5, 2022. Comments regarding the CDBG-DR Action Plan were accepted via web email to Disaster@IowaEDA.com, mailed to the Iowa Economic Development Authority, 1963 Bell Avenue, Suite 200, Des Moines, IA 50315, and collected during the public hearing. IEDA also held consultations with the following communities to discuss the action plan in greater detail ahead of and at the start of the public comment period:

Date	Attendees
May 2, 2022	City of Belle Plaine, East Central Iowa Council of Governments (ECICOG)
May 2, 2022	City of Marshalltown, City of St. Anthony, Region 6 Council of Governments (Region 6)
May 2, 2022	City of Fairfax, ECICOG
May 3, 2022	City of Marion, ECICOG
May 3, 2022	City of Hiawatha, ECICOG
May 3, 2022	City of Vinton, ECICOG
May 4, 2022	City of Fairfax, City of Lisbon, City of Ely, ECICOG
May 5, 2022	Linn County
May 6, 2022	City of Cedar Rapids
May 12, 2022	Refugee in-person engagement with the City of Cedar Rapids
May 19, 2022	Benton County communities, ECICOG
May 23, 2022	Tama County Economic Development, City of Tama
May 25, 2022	Benton County communities, ECICOG
May 26, 2022	Sac and Fox Tribe of the Mississippi in Iowa, Region 6

For more information, citizens can refer to the IEDA citizen participation plan that can be found at <https://www.iowaeda.com/disaster-recovery/cdbg-derecho/>.



3.1.2 Public Hearings

Per the Federal Register’s approach for CDBG-DR, at least one public hearing in Linn County is required during the 30-day comment period to obtain citizens’ views and to respond to proposals and questions. The process below will be followed for a public hearing regarding the use of CDBG-DR funds or a substantial amendment.

All public hearings (whether in-person, virtual, or hybrid) will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency. If the hearing will be conducted virtually, the hearing will allow questions in real time for all attendees. Both in-person and webinar hosted hearings will be promoted through direct email and via partnering associations for at least 5 business days prior to the hearing.

IEDA held its public hearing on the action plan virtually on May 26, 2022. The notification about the hearing was posted in the Des Moines Register and Cedar Rapids Gazette and sent to local governments, councils of governments, and local organizations. Along with the hearing, IEDA has provided key information and recorded presentations on the Action Plan and the funded programs on its disaster recovery website. As per the Language Access Plan, IEDA made available versions of the Action Plan in both English and Spanish.

3.1.3 Complaints and Appeals

IEDA or its subrecipients will provide a written response to each formal complaint within 15 working days of recipient of the complaint or will document why additional time for a response is needed.

- Formal complaints are written statements of grievance, including email, comments posted on the IEDA website, and handwritten complaints. IEDA shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the IEDA website. IEDA shall maintain a tracker for collecting and categorizing complaints through resolution.
- Informal complaints are verbal complaints. IEDA and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process
- 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 Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

IEDA will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on the [2020 CDBG-DR Derecho Recovery website](#) to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

IEDA or its subrecipients will include a written appeals process within each set of program guidelines. The appeals processes will include, but are not limited to, the following:



- The process for submitting, tracking, and resolving a written appeal to the organization administering the program (IEDA or its subrecipient), to include whether an appeals committee will be established to review and/or rule on appeals.
- The documentation required when submitting an appeal.
- The timelines for reviewing and providing a response to the appeal.
- Clarification of what may or may not be appealed. Generally, policies that have been approved and adopted within program guidelines may not be appealed. IEDA and its subrecipients do not have the authority to grant an appeal to a regulatory or statutory or HUD-specified CDBG-DR requirement.

3.1.4 Public Website

IEDA has developed the [2020 CDBG-DR Derecho Recovery website](#) that does and will continue to maintain information on how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, as well as details on all contracts and ongoing procurement processes.

As IEDA gets its 2020 CDBG-DR Program underway, IEDA will make the following items available:

- Action Plan created using a Disaster Recovery Grant Reporting (DRGR) system (including all amendments).
- Each Quarterly Progress Report (as created using the DRGR system).
- Citizen Participation Plan.
- Procurement policies and procedures.
- All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts).
- Summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made quarterly.

3.1.5 Amendments

Over time, recovery needs will change. Thus, IEDA 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, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.



When unmet needs and program descriptions or other sections rise to the level of requiring an action plan amendment, the State will do the following:

- Ensure that the current version of the Action Plan is accessible for viewing as a single document, with all amendments, so that the public and HUD do not have to view and cross-reference changes among multiple amendments.
- Identify amendments by highlighting added or changed text and striking out deleted text.
- Include a table that clearly illustrates where the funds are coming from and where they are going. Include a revised budget allocation table that reflects the entirety of all funds, if applicable to the amendment.

3.1.5.1 Substantial Amendment

A change to this Action Plan is considered substantial if it meets the following criteria:

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity,
- The allocation or reallocation in excess of \$5 million or greater of a program budget, and
- A proposed change to an adopted method of distribution.

When IEDA pursues the substantial amendment process, the amendment will be posted on the [2020 CDBG-DR Derecho Recovery website](#) for a 30-day public comment period. The amendment will be posted in adherence with the Americans with Disabilities Act (ADA) and limited English proficiency requirements. IEDA will review and respond to all public comments received and submit to HUD for approval.

A substantial action plan amendment shall require the following:

- The State will revisit the impact and needs assessment when moving funds from one program to another through a substantial amendment.
- A 30-day public comment period will include the following:
 - The State will prominently post the action plan amendment on the IEDA official disaster recovery site at <https://www.iowaeda.com/disaster-recovery/cdbg-derecho/>.
 - The State will afford residents, affected local governments, and other interested parties a reasonable opportunity to review the plan or substantial amendment.
 - The State will identify and consider potential barriers that limit or prohibit equitable participation and will undertake reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with limited English proficiency. This includes the following:
 - The action plan amendment will be translated according to the CDBG-DR Language Access Plan.



- The action plan amendment will be posted in a way that meets all accessibility requirements
- The State will review and respond to all written and oral public comments received. Any updates or changes made to the Action Plan in response to public comments shall be clearly identified in the Action Plan and amendments. The public comments also will be submitted to HUD with the final Action Plan amendment.
- Receipt of approval from HUD.

3.1.5.2 Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. IEDA will notify HUD 5 business days before the change is effective. All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

3.2 Displacement of Persons and Other Entities

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, IEDA and subrecipients will coordinate with applicable agencies and entities to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and implementing regulations at 24 CFR Part 570.496(a).

These regulations and requirements apply to both property owners and tenants in the event that proposed projects cause the displacement of persons or other entities. IEDA will include detailed policies and procedures for when proposed programs or projects could potentially cause the displacement of people or other entities. IEDA also will budget to cover the costs involved in implementing those policies and procedures. Currently, it is not anticipated that proposed programs will cause displacement.

IEDA will draw on existing Residential Antidisplacement and Relocation Assistance Plans (RARAPs) and will adapt them to meet the URA, Section 104(d), and related waivers and the alternative requirements specified in the Consolidated Notice. The adapted RARAP also will be updated prior to implementing any activity with CDBG-DR grant funds.

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.

The derecho displaced many residents, both tenants and homeowners who are still looking for access to the housing market. Due to the limited stock of affordable housing, residents are finding it difficult to become first-time homebuyers or find suitable rental housing to move into.



The proposed programs in this Action Plan will look to address displacement due to the derecho by providing new housing opportunities.

3.3 Protection of People and Property

The State of Iowa will leverage CDBG-DR funds to build economic and disaster resilience into all recovery programs and activities. The Action Plan, as written, intends to promote the development of affordable and resilient housing that serves impacted residents, the replanting of trees in the natural area to promote energy efficiency, and the upgrading of reliable power sources for critical facilities. All housing rehabilitation, reconstruction, or new construction will meet the Green Streets Criteria.

The State-developed Iowa Green Streets Criteria will be used to ensure sustainable building practices, including energy efficiency, durability, health, and safety. The green building practices improve affordable housing and community facilities by ensuring they are cost effective to build while also being durable and practical to maintain and enhancing quality of life for residents. Some of the measures from the criteria include:

- Ensuring residential construction projects either construct a basement or provide a storm shelter to protect against wind forces and wind debris during severe weather
- Managing moisture in roofing and wall systems to avoid mold and degradation over time
- Prohibiting new development within the 100-year floodplain
- HUD-assisted projects shall consider water and resource efficiencies, improved indoor air quality filtration and enhanced Operation & Maintenance plans that will serve to scale up deployment of renewable energy best practices.

At least 15% of the CDBG-DR funds will be used for mitigation.. For new housing, the mitigation funds will encourage the the use of high quality and durable building materials that can withstand future storms. For infrastructure, the mitigation funds will foster the growth of new native trees that will provide climate benefits and improve neighborhood values. Mitigation funds in infrastructure will also provide for the installation of generators that provide a place of shelter and emergency services during prolonged power outages during and after future natural disasters.

The 2020 Midwest Derecho was a high-wind event and each of the programs looks to address its impacts and mitigate against future severe storm effects. The following sections will focus on the various standards that will be used to address the protection of people and property.

3.4 Elevation Standards

All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 1% annual chance (or 100-year) floodplain, which receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor,



including the basement, at least 2 feet above the 1% annual chance floodplain elevation (base flood elevation). Mixed-use structures with no dwelling units and no residents below 2 feet above base flood elevation must be elevated or floodproofed in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or a successor standard up to at least 2 feet above base flood elevation.

If a Critical Action structure is located in a 500-year floodplain, the structure must be elevated 3 feet above the 100-year floodplain. Critical Actions are defined as “any activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.” For example, Critical Actions include hospitals, nursing homes, emergency shelters, police stations, fire stations, and principal utility lines.

IEDA has a prohibition against using CDBG-DR funding to support new housing construction or rehabilitating housing within the FEMA SFHA, or 100-year floodplain, as well as new housing construction in the 500-year floodplain. However, if the prohibition would change, IEDA will ensure that the HUD-required elevation standards are met by developing elevation construction requirements for each applicable housing program. The cost of elevation will be included as part of the overall cost of rehabilitation or replacement of a property. As this cost could vary from site to site depending on several factors, the standards will include a mechanism to determine cost reasonableness, which could include analyzing multiple bids from contractors, using cost-estimating software, and/or reviewing examples of comparable costs to elevate structures in similar markets.

Residential rehabilitation and new construction will emphasize the strength and durability of construction materials to help mitigate similar wind events in the future through the use of FORTIFIED construction standards where these standards exceed the Iowa Green Streets Criteria.

3.5 Flood Insurance Requirements

The 2020 Midwest Derecho was not a flooding event. Property owners who are receiving assistance must comply with all flood insurance requirements. However, because the related disaster was a wind event instead of a flood disaster event, the following conditions **do not** apply:

- HUD-assisted homeowners for a property located in an SFHA must obtain and maintain flood insurance in the amount and duration prescribed by FEMA’s National Flood Insurance Program. IEDA may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has received federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. IEDA is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:
 1. The combined household income is greater than 120% of the AMI or the national median,
 2. The property was located in a floodplain at the time of the disaster, and



3. The property owner did not maintain flood insurance on the damaged property.
- To ensure that adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance, such persons may receive CDBG-DR assistance if:
 4. The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
 5. The household earns less than 120% of the AMI or the national median and has unmet recovery needs.

3.6 Construction Standards

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

IEDA will support HUD's Climate Action Plan (November 2021) in placing greater emphasis on strengthening green building design in new construction, reducing total building energy output while maximizing site selection and development for energy reduction practices, including thermal and solar opportunities, to meet the President Joe Biden Administration reduction target goal of lowering economy-wide net greenhouse gas emissions by 50 to 52 percent by 2030.

IEDA will consider HUD's new Environmental Assessment Factors eGuide on Climate Change, Energy Efficiency and Environmental Justice when considering; 1) Access to mass transit as a key component to future stability 2) Access to biking/walking trails, and open space/recreation parks as key drivers to long-term wellness; 3) Promotion of transit-oriented development to reduce vehicle dependencies and create more sustainable transportation opportunities; 4) Access to alternative transportation modes and walkability 5) Land-use changes that allow for denser, transit-oriented housing developments to reduce households' reliance on cars, thereby improving access for minority, low income, and immigrant populations' accessibility to employment and public services, while creating a meaningful shift to using low and zero-carbon energy.

IEDA will use its Iowa Green Streets Criteria for the proposed programs or activities. The [Iowa Green Streets Criteria](#) was created by IEDA in collaboration with Enterprise Green Communities and has influenced the development of thousands of residences and projects since 2008. The guidelines have recently been updated to integrate safe rooms, broadband, zero energy and zero carbon, healthier materials, and other optional and required criteria to keep the guidelines up to date and relevant. The criteria promote resilient and mitigatory construction focused on public health, energy efficiency, water conservation, smart locations, operational savings, and sustainable building practices. Examples of mitigatory construction measures include the installation of a saferoom in homes with no basement. There also are measures that prevent mold, such as managing the moisture outside the home, ventilation, and the use of moisture-resistant backing materials in the bath, kitchen, and laundry areas.



Iowa intends to meet the Green and Resilient Building standard for all new construction and reconstruction of residential buildings and all rehabilitation activities of substantially damaged residential buildings utilizing the Iowa Green Streets criteria. The Green Streets Criteria meets and/or exceeds the Enterprise Green Communities standard.

For rehabilitation of non-substantially damaged residential buildings, IEDA will follow the guidelines to the extent applicable as specified in the HUD Community Planning and Development (CPD) Green Building Retrofit Checklist or, if more stringent, the Iowa Green Streets Criteria. When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR®-labeled, WaterSense-labeled, or Federal Energy Management Program-designed products and appliances.

The definition of “substantial damage” in 44 CFR 59.1 is any reconstruction, rehabilitation, addition, or other improvement to a structure, the total cost of which equals or exceeds 50% of the market value of the structure before the damage occurred.

All projects will be subject to cost reasonableness standards as outlined in the policies and procedures of the applicable program specific to the applicable activity to ensure that construction costs are reasonable and consistent with market costs.

3.7 Contractors’ Standards

Contractors selected under IEDA will make every effort to provide opportunities to LMI persons by providing resources and information to notify Section 3 individuals and businesses about opportunities in the community. Grantees may elaborate on specific steps to promote Section 3.

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

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

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

Recovery programs implemented by IEDA and its subrecipients will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. All contractors also must possess an Iowa business license. Construction contractors will be required to carry the required licenses and insurance coverage for all work performed, and contractors will be required to provide a warranty period for all work performed. The Iowa Green Streets Criteria also has construction management requirements.



Contractors' standards, warranty periods, and warranty notification periods will be detailed in the respective policies and procedures documents and will pertain to the scale and type of work being performed, including the controls for ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction. Rehabilitation contract work provided through a program administered by IEDA included in this Action Plan may be appealed by homeowners and small businesses (if applicable) whose property was repaired by contractors under the State's control.

In addition, IEDA staff will make CDBG-DR beneficiaries aware of the risks of contractor fraud and other potentially fraudulent activities that can occur in communities recovering from a natural disaster. The Iowa Attorney General Consumer Protection Division's checklist will be provided to subrecipients and published on IEDA's 2020 CDBG-DR disaster recovery webpage. This checklist provides information on how individuals can detect possibly fraudulent contractors. Information on how to report to the Iowa Attorney General Office's Consumer Protection Division, will also be provided with the checklist. All subrecipients, contractors, and beneficiaries will be required to affirm that they have reviewed the checklist. If a CDBG-DR beneficiary experiences contractor or other fraud, it will be referred to the Iowa Attorney General's office.

The processes for homeowners to submit appeals for rehabilitation work, as well as complaints such as contractor fraud, poor quality work, and associated issues, will be detailed within each respective set of program guidelines.

3.8 Preparedness, Mitigation, and Resiliency

3.8.1 Design Programs Protecting People and Property from Harm

The primary focus of the housing recovery program is to provide relief for those affected by disasters while complying with all CDBG-DR requirements and addressing recognized impediments to fair housing choice as required under the Fair Housing Act. Assistance may be provided to eligible applicants under a variety of housing option activities, including acquisition, rehabilitation, reconstruction, new construction, demolition, elevation, hazard mitigation, down payment assistance, reimbursement, and storm hardening of homeowner and rental housing units, as allowable. All housing activities should consider the following objectives:

- Provide high-quality, durable, resilient, mold-resistant, energy-efficient, decent, safe, and sanitary housing that meets Green Building Standards and mitigates the impact from future disasters.
 - Resilient measures may include elevating the first floor of habitable area, breakaway ground floor walls, reinforced roofs, storm shutters, and so forth.
 - Rental units also will follow safe, decent, and sanitary requirements in the impacted areas identified in the HUD-approved Action Plan.
- Prioritize households while affirmatively furthering fair housing for the following:
 - Families with children under age 18



- Elderly households
- Disabled households
- Veteran populations
- Emphasize housing choices and designs to reduce maintenance and insurance costs, as well as provide independent living options.
- Make improvements to reduce the possibility of property damage, personal and commercial hardship, and long-lasting monetary burdens.

3.8.2 Emphasizing High Quality, Durability, Energy Efficiency, and Sustainability

For rehabilitation construction, the State will follow the Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold-resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program-designated products and appliances or other equivalent.

IEDA will support HUD's Climate Action Plan (November 2021) in placing greater emphasis on strengthening green building in new construction, reducing total building energy output while maximizing site selection and development for energy reduction practices, including thermal and solar opportunities to meet the President Joe Biden Administration reduction target goal of lowering economy-wide net greenhouse gas pollution by 50 to 52 percent by 2030.

3.8.3 Enforcement of Resilient Building Codes

IEDA will require both quality inspections and code compliance inspections on all projects. Site inspections will be required on all projects to ensure quality and compliance with building codes. IEDA will encourage and support subrecipients' efforts to update and strengthen local compliance codes to mitigate hazard risks due to high winds, tornados, and flooding where applicable. In the project application, subrecipients will submit an explanation of both current and future planned codes to mitigate hazard risks. IEDA will provide technical guidance on hazard mitigation code examples.

3.8.4 Funding Feasible, Cost-Effective Measures

IEDA will require that grantees demonstrate that projects (1) address a problem that has been repetitive or a problem that poses a significant risk to public health and safety if left unsolved; (2) cost less than the anticipated value of the reduction in both direct damages and subsequent negative impacts on the area if future disasters were to occur; (3) have been determined to be the most practical, effective, and environmentally sound alternative after consideration of a range of options; (4) contribute, to the extent practicable, to a long-term solution to the problem it is intended to address; and/or (5) consider long-term changes to the areas and entities it protects and have manageable future maintenance and modifications requirements.



3.8.5 Making Land Use Decisions to Reduce Future Risks

IEDA will local planning commissions to inform land use decisions associated with use of the 2020 CDBG-DR funds. The commissions primarily act in an advisory capacity to the elected body. The commission studies issues, oversees the preparation of plans and ordinances, and reviews and advises on development proposals. The commission can become an effective force in shaping the future of a community when its work leads to solving practical problems in an informed, impartial manner.

The Iowa Code spells out two specific responsibilities for the commission related to the development and maintenance of the zoning ordinance.

While the elected body has the power to adopt the zoning ordinance, the responsibility for overseeing the preparation of the ordinance falls to the planning commission. Iowa Code §§ [414.6 \(cities\)](#) and [335.8 \(counties\)](#) specifically require the commission “to recommend the boundaries of the various original [zoning] districts, and appropriate regulations and restrictions to be enforced therein. Such commission shall, with due diligence, prepare a preliminary report and hold public hearings thereon before submitting its final report; and the [elected body] shall not hold its public hearings or take action until it has received the final report of such commission.” Usually, the commission works with a consultant, council of governments, or the city or county’s own staff, who handle the technical details of ordinance drafting.

Iowa Code §§ [414.6 \(cities\)](#) and [335.8 \(counties\)](#) provide that after the initial adoption of the zoning ordinance, “the zoning commission may, from time to time, recommend to the [elected body] amendments, supplements, changes or modifications.” This includes any change proposed by a landowner to the map (for example, requesting that a property be rezoned from one district classification to another) or the text of the ordinance. The planning commission should study the proposed change, hold a public hearing, and forward its recommendations to the elected body. Likewise, the responsibilities of the commission include keeping the zoning ordinance current by recommending amendments that affect a broader area or the community as a whole when the commission’s study and experience indicates a change is necessary. Such recommendations for updates should be forwarded to the elected body.

The planning commission plays a vital role in developing land use policy that goes well beyond the duties outlined in the Iowa Code. While the policy development responsibilities of the commission vary considerably from community to community, some of the most common tasks include:

- Assisting in the preparation of the comprehensive plan; functional plans such as for bike trails, transportation, or sanitary sewer expansion; and plans for geographic subareas like downtowns, neighborhoods, or recently annexed areas.
- Assisting in the preparation of the subdivision ordinance.
- Assisting in the preparation of a community capital improvement plan (CIP). The CIP is a management and fiscal planning tool that communities use for scheduling, financing, and constructing needed public improvements. The planning commission’s participation in CIP



development is crucial because the CIP should be directly linked to the goals and objectives of the comprehensive plan.

- Undertaking other special studies related to the physical development of the community, as requested by the elected body. These studies could address such varied topics as the need for more affordable housing, responses to new State or federal directives, or the demand for increased parkland.
- Informing and educating citizens about ongoing planning projects and community development issues.

3.8.6 Increase Awareness of Hazards

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

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

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

3.8.7 Developing the Risk Assessment

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

IEDA has completed this risk-based [Mitigation Needs Assessment](#) to identify and analyze all significant current and future disaster risks that provide a substantive basis for the activities



proposed in [Section 4](#). The assessment utilized the findings of Iowa’s State Hazard Mitigation Plan; data and research acquired from essential data resources; and consultation with public, private, and nonprofit stakeholders to arrive at a thorough assessment of the hazards that pose substantial risk of loss of life, injury, damage, and loss of property, along with suffering and hardship.

3.8.8 Using the Hazard Mitigation Plan (HMP)

The State of Iowa’s 2020 Comprehensive Emergency Plan (CEP) is the most recent risk assessment completed through the FEMA hazard mitigation planning process and is the starting point for the Action Plan’s risk-based Mitigation Needs Assessment. The CEP was completed by the Iowa Department of Homeland Security and Emergency Management, which focuses on emergency management and the hazards faced by Iowans and provides a mitigation strategy for the State. The purpose of the CEP is to reduce death, injuries, and property losses caused by natural hazards in Iowa. The 2020 CEP identifies hazards based on the history of disasters within the State and lists goals, objectives, strategies, and actions for reducing future losses.

This assessment utilizes the findings of Iowa’s CEP; data and research acquired from essential data resources; and consultation with public, private, and nonprofit stakeholders to arrive at a thorough assessment of the hazards that pose a substantial risk of loss of life, injury, damage, and loss of property, along with suffering and hardship.

3.8.9 Mitigation Efforts Must Be Cost Reasonable

All rehabilitation, reconstruction, and new construction work will be designed to incorporate the principles of sustainability, including water and energy efficiency, resilience, and mitigation against the impact of future disasters. IEDA will—and will encourage its subrecipients to—incorporate preparedness and mitigation measures for rebuilding activities. This helps to ensure that communities build back safer and stronger than before the disaster. Incorporation of these measures also reduces costs in recovering from future disasters. Mitigation measures that are not incorporated into those rebuilding activities must be a necessary expense related to disaster relief, long-term recovery, and the restoration of infrastructure.

3.8.10 Long-Term Recovery Planning

IEDA has an excellent relationship with the statewide COGs and will coordinate with the COGs to promote sound, sustainable, long-term recovery planning that has been informed through the evaluation of natural hazards. In preparing this Action Plan, IEDA met with COGs, nonprofits, and agencies as reflected in Figure 20, Consultation Events Held to Date.

3.9 Broadband Infrastructure in Housing

Per [24 CFR 570.202](#), any substantial rehabilitation or new construction of a building with more than four rental units will include the installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,



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

3.10 Cost-Effectiveness

The State will establish policies and procedures to assess the cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation or reconstruction program or activity funded with CDBG-DR funds. Policies and procedures also will establish the criteria for determining when the cost of rehabilitation or reconstruction of the unit will not be cost-effective relative to other means of assisting the property owner.

As mentioned above, the existing housing stock is not affordable for the residents who need housing the most. Rehabilitating old and damaged housing may not be the most cost-effective way and will certainly not address future storms like the derecho. Constructing new housing using updated technologies and better energy-efficient materials will ensure that residents can own a home that is resilient and addresses the risks faced by the community.

IEDA will define “demonstrable hardship” as experiencing conditions such as continued financial hardships, impacts from COVID-19 on the affordability of the housing stock, or residing in unsafe or unsanitary living conditions as a result of the 2020 Midwest Derecho.

IEDA defines a residential property as “not suitable for rehabilitation” if any of these conditions apply:

- The property is declared a total loss.
- Repairs would exceed 50% of the cost of reconstruction.
- Homes cannot be rehabilitated or reconstructed in place under existing agency policies and award caps due to legal, engineering, or environmental constraints, such as permitting, extraordinary site conditions, or historic preservation.

The State may provide exceptions to award maximums on a case-by-case basis and will include procedures within program guidelines on how the State or its subrecipients will analyze the circumstances under which an exception is needed, and the amount of assistance necessary and reasonable.

3.11 Duplication of Benefits

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, generally prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster for which such person, business concern, or other entity has received financial assistance under any other program or from insurance or any other source.





To comply with Section 312, IEDA shall ensure that each program and activity provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met.

As per the Duplication of Benefits Policies and Procedures Manual, IEDA and its subrecipients are subject to the requirements in Federal Register Notices explaining the duplication of benefits requirement (84 FR 28836 and 84 FR 28848, published June 20, 2019, or other applicable notices).

4. Proposed Use of Funds

4.1 Overview

The Iowa Economic Development Authority is the lead agency and responsible entity for administering \$57,666,000 in CDBG-DR funds. These programs included:

- New Resilient Affordable Single-Family Housing
- New Housing – Rental
- Infrastructure to Support Housing
- Owner-Occupied Rehabilitation
- Tree Canopy and Tree Replanting Program
- Generators for Critical Facilities
- Administrative

The State of Iowa conducted engagements with impacted communities and analyzed data on the impact from the 2020 Midwest Derecho (DR-4557) as part of the unmet needs assessment to understand what forms of damage communities suffered because of this disaster, what challenges the communities continue to face, and what programs would be the most impactful. From the data received, the State has prioritized programs that will assist in addressing both the short- and long-term recovery needs of its residents and communities.

Based on the unmet needs assessment and hazard risk assessment, recovery is needed primarily in housing, infrastructure to support housing, and resilient infrastructure. For housing, responses from conducted surveys indicate that a major challenge to the State is a lack of resilient, affordable new homes to purchase after the disaster. In addition, affordable rental units existing at the time of the disaster have gone up in price and are no longer available or affordable. Therefore, affordable new rental housing is an unmet need after the disaster. The effects of the 2020 COVID Pandemic also exacerbated the lack of affordable housing in the State by limiting people's ability to pay their mortgages, increasing construction delays, increasing the cost of materials, and reducing the number of housing units entering the supply chain.

Due to the nature of this disaster being wind-driven, most damages caused were covered by homeowner's insurance. Furthermore, the damages tended to be less severe compared to a





flooding event. The State is developing a homeowner rehabilitation program to assist homeowners with the remaining repairs due to the 2020 Midwest Derecho impacts. The State intends to use CDBG-DR funding to provide rehabilitation for current homeowners and support the construction of both new owner-occupied and rental housing in the most impacted areas of the State. In total, the State intends to commit approximately 71% of program funding to housing activities to help residents apply for rehabilitation on their homes, build new affordable housing units, and support the ability of tenants to purchase homes and attain more personal, emotional, and financial security in their living situation than they experienced while renting during the derecho.

For Infrastructure, the State is committed to ensuring the development of new resilient, affordable housing and is committing infrastructure funds in support of new housing development. In addition, responses from the survey highlighted the effects of prolonged power outages, significant tree loss in key areas, and damage to public buildings and facilities due to the 2020 Midwest Derecho. The State will commit approximately 24% of program funding to infrastructure. Proposed infrastructure activities are intended to support new resilient, affordable housing development and tree replanting efforts to assist with future climate mitigation and to improve the energy resiliency of critical facilities that provide benefit to communities.

Five percent of the overall grant will be used for administration of the grant. Administration of the grant would include compliance monitoring, performance tracking, grant reporting, and general administration.

There is currently no intended use for planning funding. IEDA has coordinated with all relevant stakeholders and assessed current needs and is ready to start implementing the programs. As IEDA monitors programs and performance, IEDA will also evaluate and determine if an adjustment needs to be made to use CDBG-DR funds for planning.

Through consultations and an analysis of other funds and resources available, at this time, there is no intended use for public housing and emergency shelters. IEDA will continue to monitor the needs for long term disaster recovery and may redirect funds to other CDBG-DR activities.



4.2 Program Budget

Table 49: Program Budget

Project	Program	Budget Allocation	HUD MIDs (80%)	State MIDs (20%)	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	New Resilient, Affordable Single-Family Housing	\$20,772,308	\$16,768,317	\$4,003,991	36.0%	\$125,000 per unit	LMI Housing	125 units
	Infrastructure to Support Housing	\$4,047,384	\$4,047,384	\$0	0.70%	Up to \$70,000	LMI Area	57 units
	Owner-Occupied Rehabilitation	\$2,500,000	\$2,500,000	\$0	4.3%	\$50,000 per LMI unit	LMI Housing or Urgent Need	50 units
	New Housing – Rental	\$19,868,008	\$17,093,008	\$2,775,000	34.5%	\$90,000 per unit	LMI Housing	209 units
Infrastructure	Tree Canopy and Tree Replanting Program	\$5,500,000	\$4,400,000	\$1,100,000	9.6%	\$1,000 per tree	LMI Area or Urgent Need	5,239 trees
	Generators for Critical Facilities	\$2,000,000	\$1,300,000	\$700,000	3.5%	\$100,000	LMI Area or Urgent Need	20 generators
Administrative	Administrative	\$2,878,300	\$2,302,640	\$575,660	5.0%	N/A	N/A	N/A
TOTAL BUDGET		\$57,566,000	\$48,411,349	\$9,154,651	100.0%			

The notices also include the following expenditure requirements, which are reflected in Table 49:

- **Program Administration Costs:** Limited to 5%—or \$2,878,300—of the total allocation.
- **Mitigation Activities:** At least 15%—or \$7,509,000—must be used for mitigation activities and/or the incorporation of mitigation measures into recovery activities. The State plans on incorporating resilience and mitigation measures into all construction programs. The State will define mitigation activities and establish mitigation measures within each program.
- **HUD-Identified Most Impacted and Distressed (MID) Areas:** At least 80%—or \$46,052,800—of the total allocation must benefit the HUD-identified areas. This includes 80% of expenditures for program administration.
- **Benefits for Low- to Moderate-Income (LMI) Persons:** At least 70%—or \$37,931,390—of the allocation (less planning and administration costs) must be used for activities that benefit LMI persons.

Table 50 summarizes how the State estimates it will meet or exceed HUD’s expenditure requirements. Actual expenditures will be tracked and reported publicly on the CDBG-DR website.



Table 50: State Requirements by Program

Project	Program	Budget Allocation	% of Total Allocation	Estimated \$ to Mitigation Activities	Estimated % to HUD-Defined MID Areas	Estimated % to LMI
Housing	New Resilient, Affordable Single-Family Housing	\$20,772,308	34.7%	\$3,450,000	80%	100%
	Infrastructure to Support Housing	\$4,047,384	10.7%	N/A	80%	70%
	Owner-Occupied Rehabilitation	\$2,500,000	4.3%	N/A	80%	70%
	New Housing – Rental	\$19,868,008	32.1%	\$2,920,000	80%	100%
Infrastructure	Tree Canopy and Tree Replanting Program	\$5,500,000	9.6%	\$5,500,000	90%	70%
	Generators for Critical Facilities	\$2,000,000	3.5%	\$2,000,000	65%	70%
Administrative	Administrative	\$2,878,300	5.0%	N/A	80%	N/A
TOTAL BUDGET		\$57,566,000	100.0%	\$13,870,000		

Descriptions of how these funding decisions reflect the Unmet Needs and Mitigation Needs Assessments and the State’s guiding principles are included within each of the program descriptions further below in the Action Plan.

4.3 How the Programs Promote Long-Term Resilience

4.3.1 Housing

The housing programs will help the State of Iowa replace damaged or destroyed housing with housing stock that is more energy-efficient and resilient to hazards in the impacted-communities (including windstorms, flooding, thunderstorms, and extreme heat weather events based on the location of the housing). In addition, the replacement housing will be built to standards that will allow impacted residents to age in place and increase the housing stock available to individuals living with disabilities. By building to higher energy efficiency, resilience, and more accommodating construction standards, the State of Iowa aims to help mitigate future loss of life and property and reduce short- and long-term interruptions caused by future disasters.

4.3.2 Infrastructure

The infrastructure programs will help the State reinvest in the natural environment that was severely impacted by the 2020 Midwest Derecho. The replanting program will allow the State to build new trees that will support aesthetic benefits, energy resiliency, carbon sequestration, and



mitigate against storm flooding. The installation of generators will support critical facilities that need to remain open and provide a public service during emergencies. These efforts are aligned with the State's initiatives and are forward-thinking in how they look to address the impact on vulnerable communities and build resiliency against future storms.

4.4 Connection to Unmet Needs

As required by 87 FR 6364 (FR-6303-N-01), the Iowa Economic Development Authority will allocate at least 80% of the funds to address unmet needs in the HUD-identified "most impacted and distressed" (MID) areas. The remaining 20% of the allocation may be used to address unmet needs in a grantee-identified MID area that received a 2020 Midwest Derecho (DR-4557) presidential major disaster declaration. Currently, the State anticipates putting 80% of funding in Linn County and the remaining 20% will be focused on supporting recovery efforts in the counties of Marshall, Tama, and Benton.

This Action Plan primarily considers and addresses housing and infrastructure unmet needs and incorporates mitigation activities into all programs.

At least 70% of all program funds will benefit LMI persons or households. Based on data and the current priorities to encourage LMI persons to participate in the program, the State anticipates meeting the LMI requirement. In addition, the State also will 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.

4.5 Leveraging Funds

The State of Iowa understands the importance of leveraging all available funds and resources to increase its ability to address and mitigate against major disasters. The State anticipates leveraging CDBG-DR funds with other funding sources such as FEMA and other State and local funds. CDBG-DR funds will be used to address critical unmet needs that remain after all other federal sources have been committed and exhausted to prevent any duplication of benefits. In addition, to ensure coordination in funding and activities, the State will utilize its strong inter-agency partnerships to ensure that information, program updates, and data are shared when necessary and utilize methods to reach vulnerable populations, protected classes, persons experiencing homelessness, and those historically underserved. Further efforts to leverage other funds and programs are detailed below:

1. The State of Iowa will coordinate with their Councils of Governments to leverage similar services being offered to communities to provide home repairs. IEDA will ensure that there are no duplicated efforts and that all funding can be maximized. For example, the East Central Iowa Council of Governments (ECICOG) has been running their [PATCH](#) (Providing Assistance to Community Homeowners) program, which aims to fill a gap in resources following the 2020 Midwest Derecho. The program will provide support, referrals, and financial assistance to LMI Linn County homeowners impacted by the storm.
2. The proposed tree removal and planting program also will leverage the existing program in Cedar Rapids called [ReLeaf Cedar Rapids](#). Following the August 2020 Midwest Derecho,





the program is guiding the city, institutions, nonprofit organizations, and private landowners in replanting more than 42,000 trees in the urban canopy in Cedar Rapids. The ReLeaf Cedar Rapids program was designed so that tree plantings address climate concerns, preserve neighborhood character, and balance equity across neighborhoods.

3. IEDA will leverage affordable housing investments by offering incentives to build resilient, affordable owner and rental housing. Incentives will include \$100,000 per unit for new single-family owner-occupied housing and \$75,000 per unit for rental housing. This is anticipated to leverage close to \$72 million in development costs.
4. Iowa Disaster Case Management: Disaster Case Management is a time limited resource and process that involves a partnership between a disaster case manager and a household impacted by a disaster to develop and carry out a Disaster Recovery Plan. This partnership provides the client with a single point of contact to facilitate access to a broad range of resources, promoting sustainable assistance for individual's and a household's recovery. These services are client focused, and provided in a manner consistent with standards for trauma-informed practice in human services.
5. Derecho Legal Hotline: Derecho 2020 survivors in Linn County who are experiencing legal problems due to the storm now have an easy way to get free legal advice. Legal problems may include issues such as: FEMA denials, problems with insurance, landlord/tenant issues, unemployment benefits denials, employment issues, contractor issues, or identity theft. Call 1-877-469-2259 during the hours of 9:00 a.m. – 4:00 p.m., Monday through Friday.
6. Community Action Agencies: A network of 17 community action agencies offer assistance, such as food delivery initiatives, clothing, diapers, and addressing emergency and disaster needs. Find a community action agency near you at <https://humanrights.iowa.gov/dcaa/iowas-community-action-agencies>. For the Linn County area, visit Hawkeye Community Action Agency at <https://www.hacap.org/>.
7. Waypoint is an organization in Cedar Rapids that has a coordinated entry for people experiencing homelessness to get housing and working with households to keep them from becoming homeless. The State has been coordinating sheltering and temporary housing services with Waypoint. Below is a list of their programs:
 - o **Madge Phillips Center Shelter**: providing overnight shelter, basic needs, information, referrals, one-on-one support, and skill development to women and families experiencing homelessness.
 - o **Coordinated Entry**: a statewide homeless service system that ensures all people experiencing homelessness are quickly identified, assessed and connected to the most appropriate housing intervention led by Waypoint in Linn, Benton, and Jones County to ensure all households in this region have fair and equal access to services.



- **Rapid Re-Housing**: helping households experiencing homelessness secure permanent housing through housing search and identification, landlord advocacy, case management, and limited financial assistance.
 - **Homeless Prevention Services**: supporting households who are at risk of entering the homeless service system with referrals to community resources to support housing stabilization.
 - **Tenant Academy**: a nine-hour housing education course providing individuals with "certification of completion" to show reliability and knowledge to potential landlords.
 - **Balance of the State Call Center**: connecting households experiencing a housing crisis throughout the state of Iowa with their local Coordinated Entry system.
8. Multi-lingual hotline: A multi-lingual hotline is available statewide for Iowans who need resources. Call the 211 Language Help Line 1-877-558-2609.

4.6 Program Partners

East Central Iowa Council of Governments (ECICOG): Based in Cedar Rapids, the organization provides regional planning and technical assistance to local governments and communities in the region. ECICOG serves the counties of Benton, Cedar, Iowa, Johnson, Jones, Linn, Tama, and Washington. ECICOG has experience in writing and administering grants, developing and assisting with citizen engagement and outreach, providing project management and administrative services, preparing maps and information to our communities about environmental factors, and supporting community development.

Region 6 Resource Partners: The association provides member communities (any local government in Hardin, Marshall, Poweshiek, and Tama counties) with professional services in the areas of comprehensive planning, access to federal and State transportation funding, housing assistance, public transit services, and grant writing and administration.

4.7 Distribution of Funds

Based on the unmet needs assessment and input from impacted communities in Iowa, the State has prioritized housing and infrastructure programs that will assist in recovery from the 2020 Midwest Derecho. Of the total grant allocation, 71% will be for assisting Iowa residents with housing needs, 24% will go for infrastructure to support new housing development and for infrastructure resiliency, and the remainder will support the State's administration needs.

Most Impacted and Distressed Areas: Based on the unmet needs, the State recognizes that Linn County suffered the most damage from the disaster event. HUD also has stated that 80% of program funding should be allocated to Linn County. In addition, the State intends to allocate the remaining 20% to Marshall, Benton, and Tama counties, which also were impacted by the 2020 disaster event. Due to continued impacts on Marshall County and the lack of funding to address all resiliency needs in the county, the State will seek to use the remaining funds to





address additional resiliency in the area. In Benton County, the devastating derecho windstorm left 90% of Benton County without power and at least 90% of the county’s residents with wind damage, ranging from minor to severe. Tama County also suffered severe damage to the area’s farm crops, livestock, and many agricultural buildings.

Eligible Applicants: All of the programs in this Action Plan will be implemented by units of general local government (UGLGs), cities, counties, and tribes, only, within the four identified MID counties presidentially declared under DR-4557 that apply for CDBG-DR funding from the State of Iowa.

Scoring Criteria: For all programs, IEDA will establish competitive application rounds. All applications within a round will be reviewed, scored, ranked, and awarded based on their scores. A minimum threshold score will be established to ensure that high-quality projects are selected. The rehabilitation program will be first-come, first-serve after meeting eligibility requirements. Programs will be limited to the HUD and State MID counties only.

All damage to infrastructure must be directly related to the disaster and infrastructure must be in support of LMI housing (either new or existing housing). A minimum threshold will be applied to ensure that applications are eligible for funding and meet the program requirements. Once IEDA determines that a project is eligible for funding, IEDA will contract with the municipality based on the application submitted.

Maximum Awards: The State of Iowa has determined maximum awards under each program based on a cost reasonableness approach and the objective of the grant to maximize the use of CDBG-DR funds to the greatest extent possible. Below is a table containing the maximum award thresholds for each program.

Exception: The State of Iowa will make exceptions to the maximum award amounts, 500-year floodplain restrictions, and other policy requirements based on its Exception Policy in program guidelines. Each request for an exception to the maximum award amount or other program policies will be reviewed on a case-by-case basis by IEDA. Requests must be submitted in writing and include a justification for exceeding the maximum award amount or other policy requirements. The policy exception is not to be implemented until IEDA reviews the request, provides a response, and authorizes the exception in writing. All exceptions must still meet HUD’s requirements for necessary and reasonable, comply with federal accessibility standards, and accommodate a person with disabilities if applicable.



Table 51: Maximum Awards by Program

Project	Program	Maximum Award
Housing	New Resilient Affordable Housing	\$125,000 per unit
Housing	Infrastructure in Support of Housing	\$70,000 per unit
Housing	New Housing – Rental	\$90,000 per unit
Housing	Owner-Occupied Rehabilitation	\$50,000 per unit
Infrastructure	Tree Canopy and Tree Replanting Program	\$1,000 per tree
Infrastructure	Generators for Critical Facilities	\$100,000 per generator

Eligible Activities: A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act (HCDA) of 1974, as amended. The Disaster Relief Supplemental Appropriations Act requires that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity:

1. Be CDBG eligible (or receive a waiver);
2. Meet a national objective as defined by 24 CFR 570.483; and
3. Addresses a direct or indirect disaster impact in a presidentially declared impacted area.

Low- to Moderate-Income Beneficiaries: This Action Plan has been developed to give priority to activities that will benefit LMI households and persons. The programs, in aggregate, will seek to benefit LMI families in a manner which ensures that at least 70% of the CDBG-DR funding is expended for activities that benefit such persons. The recovery activities described will make use of the following national objectives: LMI persons and urgent needs.

Use of the Urgent Need National Objective: As mentioned IEDA will prioritize low-and-moderate income persons, households, and areas in the administration of its programs. The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation benefits within the HUD- or grantee- identified MID. Applications submitted to IEDA will address the urgency, type, scale, and location of the disaster-related impact in order to inform when the urgent need category is needed.

4.8 Program Income

The State understands that when implementing certain activities with CDBG-DR funds, there is the potential for generating program income. Currently, none of the proposed programs are anticipated to produce program income. If applicable, the State’s management system is set up to track program income and the State will develop program income policies and procedures for specific programs. Consider the following:



- **During the Grant Period:** Should program income be generated, program 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.
- **Grant Is Closed:** The recipient of program income will mail the payment to IEDA with the contract and activity number in the memo line. The funds will be deposited by IEDA and recorded as program income to be applied to the State’s annual CDBG Program. Program income funds will be expended first for eligible annual CDBG claims. Any remaining balance in CDBG-DR activities, resulting from the use of program income, will be de-obligated by the State at activity closeout.

4.9 Resale or Recapture

As per the Federal Register Notice ([87 FR 6364](#)), IEDA shall establish resale or recapture requirements for housing programs funded and shall outline those requirements in the program guidelines for the activity. The resale and recapture provisions must clearly describe the terms of the resale and recapture provisions, the specific circumstances under which these provisions will be used, and how the provisions will be enforced (whether by recorded deed restrictions, covenants, or other similar mechanisms). The affordability restrictions, including the affordability period requirements, do not apply to housing units newly constructed or reconstructed for an owner-occupant to replace the owner-occupant’s home that was damaged by the disaster.

4.10 Program Details

4.10.1 Housing Programs

4.10.1.1 New Resilient Affordable Housing

Table 52: New Resilient Affordable Housing Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
New Resilient Affordable Housing	\$20,772,308	\$16,768,317	\$4,003,991

Program Description: Communities still face significant needs for restoring and improving the resilience of the housing stock in the disaster-impacted MID areas. The new resilient, affordable housing will be owner occupied and coordinated with a homebuyer assistance program. This program targets new homeowners who want to transition from renting to home ownership but will be available to previous or current homeowners. The program will offer the construction of single-family houses (1-4 units) on vacant lots within existing neighborhoods or the development of new neighborhoods for residential purposes. Based on industry standards, the average infrastructure cost associated with building new units averages about 35%, which equates to \$70,000 per housing unit to provide needed infrastructure to support housing development.

As per Federal Register Notice 83 FR 6364 (refer to II.B.1), CDBG-DR funds are eligible to assist new construction activities. When a CDBG-DR grantee carries out a new housing





construction activity, [24 CFR 570.202](#) shall apply and shall be read to extend to new construction in addition to rehabilitation assistance. Private individuals and entities must remain compliant with federal accessibility requirements, as well as with the applicable site selection requirements of 24 CFR 1.4(b)(3) and 8.4(b)(5).

Based on the disaster impact and post-disaster unmet needs assessment included in this document, the State understands that a variety of housing sizes and types are needed to respond to the needs of all residents. IEDA will make awards to projects that offer a variety of housing sizes in order to best serve families with children, disabled persons, and seniors. The State understands the value of increasing single family homeownership opportunities as a tool to build wealth and reduce poverty, particularly for LMI households.

Program guidelines will be fully developed for the new resilient, affordable housing for home ownership program, and will include the following:

- Instructions for local municipalities (city, county, or tribe) to submit competitive applications to IEDA, which will be scored and ranked.
- Incentives can be drawn down during construction.
- \$100,000 incentive award per owner-occupied housing unit for construction reimbursement with CDBG-DR funds.
- Up to \$25,000 mitigation incentive per unit for developers to use towards building materials that can better withstand storm events and mitigate against future natural disaster damage.
- All sold units can utilize CDBG-DR assistance for down-payment and closing costs as a benefit to the buyer, providing up to 100% of the minimum required down-payment and recorded with a 5-year receding lien.
- The developer must own the property of the building site or can demonstrate site control.
- New resilient, affordable housing will be awarded as a grant, with 10% retainage held until an LMI-qualified buyer occupies the home.
- For each sale, the applicant must be an LMI-qualified buyer.
- All new units must be constructed outside of the 100- and 500-year regulatory floodplains.
- All units must have access and connection to municipal utilities, including water, sewer, and broadband. No projects dependent on wells and/or septic systems will be eligible.
- Additional funds (up to \$70,000) needed to provide the infrastructure for the new housing development also is available as a component of the program.
- All units must be marketed to August 2020 derecho-impacted victims for 4 months before being offered to an eligible member of the public.
- The sale of housing units must be capped at no more than \$185,000 per housing unit . IEDA reserves the right to increase the maximum for sale amount when the State, subrecipient and/or development team has paired, included, or otherwise made available financial resources to ensure the home is affordable to LMI households..





- Developers who sell the housing unit will adhere to applicable affordability periods stated in IEDA’s program guidelines.

Public Services: Iowa’s CDBG-DR housing programs strive to provide housing that is permanent, affordable, and good quality. To ensure that homeowners and renters can afford their mortgage or lease, IEDA will coordinate with and encourage its subrecipients to make use of existing services or develop services that will provide applicants with housing counseling, financial, legal, and health support. For example, IEDA in its partnerships with Linn County, ECICOG and the City of Cedar Rapids will leverage the services offered through its [PATCH](#) program. The program will identify needs, identify contractors, and provide financial assistance to low-to-moderate income Linn County homeowners impacted by the storm. These services will help reduce the barrier to entry for homeowners and renters and provide stability for families to remain in their homes longer.

Homebuyer Assistance: Federal Register Notice 87 FR 6364 (refer to II.B.5.D) states that grantees, upon completing construction of the housing units, can provide down payment assistance. The maximum allowed is 100% of the required down payment, based on lender requirements and credit assessment of the buyer, plus closing costs. Qualified LMI households, under 80% of the AMI, are eligible to participate and must be able to secure a mortgage. Each potential buyer should be advised on the credit requirements needed to buy a home. This assistance will be documented in the form of a receding forgivable loan and is subject to recapture in accordance with the receding percentages documented in the filed loan.

Program Tieback to Disaster: This program addresses the unmet needs tied to providing new resilient, affordable housing to improve the housing stock in the disaster-impacted MID areas. The State intends to market to first-time homebuyers to assist impacts on the rental community but will not restrict the program to first-time homebuyers. The State is currently anticipating the creation of 137 new single-family housing units over the life of this grant.

Promoting Equity in Recovery: The disaster impacted the housing conditions of many residents in the community. Due to the lack of affordable housing in the market, many households were forced to make quick decisions. Many people, including vulnerable refugee and immigrant populations, were forced into unsuitable living conditions and homelessness. Years later, many of these impacted populations are still unable to find suitable and affordable housing. The CDBG-DR funds will be used to reduce the barriers (limited housing finances, available housing stock) that individuals still face accessing the housing market. The program is intended to help impacted residents, vulnerable populations, and members of underserved communities expedite their recovery by:

- Performing outreach and engagement to understand the needs of impacted participants.
- Creating a personalized recovery plan.
- Coordinating with government agencies and developers.
- Coordinate with local organizations to ensure that refugee and immigrant populations are aware of the assistance and can access it.





- Coordinate with local non-profit organizations that provide services to people experiencing homelessness, people with disabilities, and historically underserved populations to ensure the promotion of the program and help remove their barriers to access the assistance.

Program Affordability Period:

For single-family projects (1-4 completed units on a parcel), the affordability period will be 15 years...

Program’s Definition of “Second Home”: Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A “second home” is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. The program will not fund second homes.

Program National Objective(s):

- Low- to Moderate-Income Housing

Program-Eligible Activities: New construction, acquisition, clearance, and homeownership assistance; HCDA Section 105(a)1, 4, 5, 8, 11, 14, 15, and 24; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364).

Eligible Applicants/Program Responsible Entity: City, county, and tribal governments are the eligible applicants and Responsible Entities

Program Maximum Assistance: The program will provide standard awards of \$100,000 per housing unit, a mitigation incentive per unit, and up to 100% of down payment assistance and closing costs for qualified homebuyers.

Program Estimated Begin and End Dates: The program will launch within one month of the grant agreement between HUD and IEDA being signed and conclude within 6 months prior to grant closeout with HUD.

Program Competitive Application Overview: IEDA will publish competitive application rounds for the new production of resilient affordable housing. All applications within a round will be reviewed, scored, ranked, and awarded based on a score. A minimum threshold score will be established to ensure that high-quality projects are selected. This program will be limited to MID counties only. Scoring priorities will include, but are not limited to, the following:

- Readiness to Proceed – How quickly a project can move from award to construction. This includes site control, established financing, and project plans and specifications.
- Resilient features for wind resistance.
- Green Streets Score – Projects that select optional Iowa Green Streets components (above the minimum) will score higher and be more competitive. This includes selecting Green





Streets Plus designs, offering ADA-accessible units beyond minimum requirements, integrated stormwater management, and so forth.

- Financial Stability and Proven Record of Development Team – Demonstrating experience.
- Proximity to the disaster-impacted area.
- Furthering orderly/planned development.

The scoring criteria are as follows and each criteria on the application will be graded from 0 to 5 points.

1. Rank the level of development of the plans, renderings, and specifications provided.
2. Rank the wind resiliency features.
3. Rank the need for infrastructure support for the newly constructed housing unit.
4. Rank the Green Score: The degree to which the proposed project is consistent with sustainability and smart growth principles and the degree to which the project exceeds the Iowa Green Communities Criteria (higher points for requesting and integrating additional green and resiliency incentives).
5. Rank how the project included the recommendations provided in the IEDA design consultation.
6. Rank whether the project intends to comply with the U.S. Department of Energy Zero Energy Ready Homes program requirements and obtain certification.
7. Rank the project's alignment with the applicant's Community Development and Housing Needs Assessment.
8. Rank the community's proposed steps to Affirmatively Further Fair Housing
9. Rank how well the project furthers infill and/or orderly development.
10. Rank the project's shovel readiness.
11. Rank how well documented the other funding sources are.
12. Rank the level of optional local match.
13. Rank how detailed the development team is. Does it include email and phone number contact information for all development team members?
14. Rank how experienced the development team is with green and resilient building standards and/or the Iowa Green Streets Criteria.
15. Rank how experienced the development team is with HUD or other federally funded projects.

Program Method of Distribution: The program will award funding to the eligible city, county, or tribal applicants located in the HUD and State MID areas.



How Mitigation Set-Aside Activities Will Meet Definition of Mitigation: All mitigation activities funded through the Mitigation Incentive will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. Eligible Mitigation Incentive activities will be derived from the Iowa Green Streets Criteria and described in the program guidelines.

How Mitigation Incentive Will Address Current & Future Risks: The Mitigation Incentive will increase homes’ resilience to future natural disasters and reduce the long-term risk of loss of life, injury, damage to and loss of property, and lessen homeowners’ suffering and hardship and impact of future natural disasters.

4.10.1.2 Infrastructure in Support of Housing

Table 53: Infrastructure in Support of Housing Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
Infrastructure in Support of Housing	\$4,047,384	\$4,047,384	\$0

Program Description: The program will provide funding for infrastructure improvements required for housing units, such as road and roadway improvements, access to utilities, trees, and so forth that are eligible for an additional funding request. Associated infrastructure requests will be submitted based on actual cost/need and reviewed by IEDA prior to award. The developer can request up to 35% of the cost of housing construction to install the infrastructure needed to support housing development.

Program Tieback to Disaster: This program addresses the unmet needs tied to providing new resilient affordable housing to improve the housing stock in the disaster-impacted MID areas. To further incentivize the development of resilient affordable housing, the developer can request up to \$70,000 per unit for infrastructure needs.

Promoting Equity in Recovery: The State will prioritize projects that provide the essential public infrastructure necessary for housing and/or will protect life and property, including for members of protected classes, HUD-identified vulnerable populations, and historically underserved communities. Infrastructure in support of housing are for projects selected through IEDA’s competitive new housing programs’ process. IEDA has included ranking an applicant’s steps to affirmatively further housing in their projects.

Program’s Definition of “Second Home”: Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A “second home” is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. The program will not fund second homes.

Program National Objective(s):





- Low- to Moderate-Area Benefit

Program-Eligible Activities: Public facilities and improvements; HCDA 105(a) 1 and 2; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364) and other applicable notices or guides.

Eligible Applicants/Responsible Entity: City, county, and tribal governments are the eligible applicants and Responsible Entities.

Program Maximum Assistance: Up to \$70,000 per unit (or 35% of housing construction costs whichever is lower).

Program Estimated Begin and End Dates: The program will launch within one month of the grant agreement between HUD and IEDA being signed and conclude within 6 months prior to grant closeout with HUD.

Program Competitive Application Overview: As part of the application for new resilient, affordable housing, refer to the Program Competitive Application Overview in Section 4.9.1.1, New Housing – Owner Occupied and New Housing-Rental.

Program Method of Distribution: The program will award funding to the eligible applicants; cities, counties, and tribes.

Program Timeline: The State is prepared to begin the program shortly after the grant is awarded and is prepared to complete the program within the period of performance.

4.10.1.3 New Resilient, Affordable Rental Housing

Table 54: New Housing – Rental Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
New Housing – Rental	\$19,868,008	\$16,768,317	\$2,775,000

Program Description: Similar to the New Housing – Owner Occupied Program, the New Housing – Rental Program will offer the construction of single-family (1-4 units) and multifamily (5+ units) structures on vacant lots within existing neighborhoods or the development of new neighborhoods for residential purposes. The State is currently anticipating the creation of approximately 194 new rental housing units over the life of this grant.

As stated above, the program guidelines will be fully developed for the New Housing – Rental Program and will include the following:



- Local municipalities (city, county, or tribe) will submit competitive applications to IEDA, which will be scored and ranked.
- \$75,000 incentive award per rental housing unit for any given development project located in eligible areas.
- Up to \$15,000 mitigation incentive per unit for developers to use towards building materials that can better withstand storm events and mitigate against future natural disaster damage.
- Incentive can be drawn down during construction.
- Developer must own the building lots or can demonstrate site control.
- All new units must be constructed outside of the 100- and 500-year regulatory floodplains.
- All units must have access and connection to municipal utilities, including water and sewer, and broadband. No projects dependent on wells and/or septic systems will be eligible
- Additional funds (up to \$70,000) needed to provide the infrastructure for the new housing development also is available as a component of the program.
- All units must be offered to disaster-impacted victims for 4 months before being offered to an eligible member of the public.
- For all rental units, the developer must meet 51% LMI-qualified tenant occupancy for the term of affordability as per the program guidelines.
- All rental units (defined as five or more units) are subject to HUD's 65% HOME rent limits for the LMI tenants for the term of affordability (20 years for new construction of rental housing, refer to II.B.3 of the Federal Register Notice).

Program Tieback to Disaster: This program addresses the unmet needs tied to providing new resilient affordable housing to improve the rental housing stock in the disaster-impacted MID areas.

Promoting Equity in Recovery: The program is intended to help impacted residents, vulnerable populations, and members of underserved communities expedite their recovery by:

- Performing outreach and engagement to understand the needs of impacted participants.
- Creating a personalized recovery plan.
- Coordinating with government agencies and developers
- Coordinate with local organizations to ensure that refugee and immigrant population are aware of the assistance and can access it
- Coordinate with local non-profit organizations that provide services to people experiencing homelessness, people with disabilities, and historically underserved populations to ensure the promotion of the program and help remove their barriers to access the assistance.

Program Affordability Period:





For multifamily projects awarded 5 or more units, the affordability period will be 20 years. For single-family projects awarded 4 or fewer units, the affordability period will be 15 years. At least 51% of units in a project must be rented to persons of LMI income and subject to the 65% HOME rent limits for the affordability period.

Program’s Definition of “Second Home”: Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A “second home” is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. The program will not fund second homes.

Program National Objective(s):

- Low- to Moderate-Income Housing

Program-Eligible Activities: New construction, acquisition, clearance; HCDA Section 105(a)1, 4, 5, 8, 11, 14, 15, and 24; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364).

Eligible Applicants/Responsible Entity: City, county, and tribal governments are the eligible applicants and Responsible Entities.

Program Maximum Assistance: The program will provide standard awards of a maximum of \$75,000 per unit.

Program Estimated Begin and End Dates: The program will launch within one month of the grant agreement between HUD and IEDA being signed and conclude within 6 months prior to grant closeout with HUD.

Program Competitive Application Overview: IEDA will publish competitive application rounds for the new production of housing. All applications within a round will be reviewed, scored, ranked, and awarded based on score. A minimum threshold score will be established to ensure that high-quality projects are selected. This program will be limited to the MID counties only. The scoring criteria is as follows and each criteria on the application will be graded from 0 to 5 points.

1. Rank the level of development of the provided plans, renderings, and specifications.
2. Rank the wind resiliency features.
3. Rank the Green Score: The degree to which the proposed project is consistent with sustainability and smart growth principles and the degree to which the project exceeds the Iowa Green Communities criteria (higher points for requesting and integrating additional green and resiliency incentives).
4. Rank how the project included recommendations provided in the IEDA design consultation.
5. Rank whether the project intends to comply with the U.S. Department of Energy Zero Energy Ready Homes program requirements and obtain certification.



6. Rank the project’s alignment with the applicant’s Community Development and Housing Needs Assessment.
7. Rank the community’s proposed steps to Affirmatively Further Fair Housing.
8. Rank how well the project furthers infill and/or orderly development.
9. Rank the project’s shovel readiness.
10. Rank how well documented the other funding sources are.
11. Rank the level of optional local match.
12. Rank how detailed the development team is. Does it include email and phone number contact information for all development team members?
13. Rank how experienced the development team is with regard to green and resilient building standards and/or the Iowa Green Streets criteria.
14. Rank how experienced the development team is with regard to HUD or other federally funded projects.
15. Rental only: Rank how detailed the pro forma and rent calculation worksheet is.

Program Method of Distribution: The program will award funding to the eligible applicants; cities, counties, and tribes.

How Mitigation Set-Aside Activities Will Meet Definition of Mitigation: All mitigation activities funded through the Mitigation Incentive will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. Eligible Mitigation Incentive activities will be derived from the Iowa Green Streets Criteria and described in the program guidelines.

4.10.1.4 Owner-Occupied Rehabilitation

Table 55: Owner-Occupied Rehabilitation Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
Owner-Occupied Rehabilitation	\$2,500,000	\$2,500,000	\$0

Program Description: The Owner-Occupied Rehabilitation Program will seek to assist LMI and UN homeowners in addressing deficiencies incurred as a result of the August 2020 derecho.. The storm blew trees into the roofs of people’s homes and in some instances blew the roof off the home or caused other damage to the structure, resulting in interior damage to the home. From the surveys conducted, IEDA understands that there is a need for rehabilitation assistance.

Because the program will benefit homeowners impacted by the 2020 Midwest Derecho, the property must be the applicant’s principal place of residence and the applicant must own the property. Residential properties containing businesses and or any kind of rental unit are not





eligible for assistance. The maximum award amount is \$50,000 per unit. The State will review exceptions for increasing award amounts above the maximums on a case-by-case basis based on the Exception Policy in the program guidelines. Non-substantial rehabilitation will need to comply with the IEDA [HUD CPD Green Building Retrofit Checklist](#) and compliance will be managed through the [Iowa Green Streets](#) Program. The program will be restricted to the HUD most impacted and distressed area (Linn County).

Program Tieback to Disaster: This program addresses the unmet needs for homeowners located in eligible MID areas impacted by the disaster. Roughly 1,772 units were impacted by the disaster according to data from FEMA on real property damage. With the funding, IEDA expects to serve at least 50 housing units.

Promoting Equity in Recovery: The program is intended to help impacted residents, vulnerable populations, and members of underserved communities expedite their recovery by:

- Performing outreach and engagement to understand the needs of impacted participants.
- Creating a personalized recovery plan.
- Coordinate with local organizations to ensure that refugee and immigrant populations are aware of the assistance and can access it.
- Coordinate with local non-profit organizations that provide services to people with disabilities, and historically underserved populations to ensure the promotion of the program and help remove their barriers to access the assistance.
- A provision has been put in to review rehabilitation needs for LMI persons in need of assistance beyond the maximum award cap.

Program’s Definition of “Second Home”: Per the requirements in the Consolidated Notice, properties that served as second homes at the time of the disaster, or following the disaster, are not eligible for assistance for rehabilitation, reconstruction, new construction, or replacement. A “second home” is defined as a home that is not the primary residence of the owner, a tenant, or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. The program will not fund second homes.

Program National Objective(s):

- Low- to Moderate-Income Housing or Urgent Need. The program may use the Urgent Need national objective to provide assistance to eligible disaster-impacted applicants with incomes greater than 80% of area median income and up to 120 percent of area median income.

Program-Eligible Activities: Rehabilitation, reconstruction, elevation, new construction, public facilities, and infrastructure in support of housing development, acquisition, and clearance; HCDA Section 105(a)1, 2, 4, 5, 8, 11, and 14; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364).





Eligible Applicants/Responsible Entity: City, county, and tribal governments are the eligible applicants and Responsible Entities.

Program Maximum Assistance: The program will set a cap of no more than \$50,000 per unit.. Homeowners cannot receive more assistance than meets or exceeds 50% of their home’s pre-disaster market value. The State will review exceptions for increasing award amounts above the maximums on a case-by-case basis based on the Exception Policy in the program guidelines.

Program Estimated Begin and End Dates: The program will launch within one month of the grant agreement between HUD and IEDA being signed and conclude within 6 months prior to grant closeout with HUD.

Program Competitive Application Overview: IEDA will publish competitive application rounds for owner-occupied rehabilitation. All applications within a round will be reviewed, scored, ranked, and awarded based on score. A minimum threshold score will be established to ensure that high-quality projects are selected. This program will be limited to the HUD MID county only. The scoring criteria is as follows and each criteria on the application will be graded from 0 to 5 points.

1. Rank the percentage of requested LMI rehabilitation funding.
2. Rank how the project aligns with the applicant’s Community Development and Housing Needs Assessment.
3. Rank the community’s proposed steps to Affirmatively Further Fair Housing.
4. Rank the level of optional local match.
5. Rank the level of community readiness.

Program Method of Distribution: Municipalities will apply for properties to receive non-substantial rehabilitation assistance. If awarded CDBG-DR funding, cities/counties/tribes must have all units under contract within 6 months after receiving notice of release of funds, unless granted an extension by IEDA.

4.10.2 Infrastructure Programs

4.10.2.1 Tree Canopy and Tree Replanting Program

Table 56: Tree Canopy and Tree Replanting Program Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
Tree Canopy and Tree Replanting Program	\$5,500,000	\$4,400,000	\$1,100,000

Program Description: As a result of the 2020 Midwest Derecho, the [Iowa Department of Natural Resources](#) reported that the State lost nearly 4.5 million trees damaged or destroyed by the storm in cities and 2.7 million trees in rural areas. The result was an estimated \$20 million in



annual benefits lost from its urban tree canopy that was damaged. Of the total in cities, the report also found that Linn County lost a majority of the trees in the State.

Communities and nonprofits working with them have begun to replenish the trees that have been lost, relying mainly on volunteer efforts backed by State initiatives. Various initiatives of the tree planting include providing trees to households that otherwise might not have access to a new tree, supporting species dependent on the natural environment, and restoring the natural habitat.

IEDA is proposing to use CDBG-DR assistance to fund the removal of stumps and support the replanting activities occurring within the MID counties. Trees will be removed and/or trees native to Iowa replanted only on public property or the public right-of-way. For anything on private land, IEDA expects local entities to support homeowner needs with their own funding. In addition, the allocation for this activity will be treated as mitigation that will aim to protect and conserve the natural areas, improve on energy resiliency by providing shade from daylighting, and mitigate future storm flooding by capturing and storing stormwater runoff for reuse or irrigation.

To maximize the benefits to the communities, IEDA will leverage other funding sources to the extent possible.

Program Tieback to Disaster: This program addresses the infrastructure-related unmet needs in eligible MID areas impacted by the disaster.

How the Program Will Advance Long-Term Resilience: The program will increase communities' resilience to future natural disasters by reducing the loss of suffering and hardship and lessening the impact of future natural disasters by rebuilding the tree canopy, which will help to reduce stormwater runoff and reduce the urban heat island effect that contributes to elevated temperatures, severe weather, and climate change.

How the Program Will Address Disaster-Related Storm Water Management/Other Systems: The program will improve the resiliency of communities by capturing more storm water on-site during disaster-related events, which will reduce the volume and speed of storm water that contributes to disaster damages in a storm event.

Promoting Equity in Recovery: The State will prioritize areas that were most impacted by the destruction of trees, the natural environment, and in low- to moderate- areas. In addition, the State will look to incorporate resiliency measures to ensure that efforts protect life and property vulnerable populations from future storms.

Program National Objective(s):

- Low- to Moderate-Area Benefit or Urgent Need. The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation public infrastructure benefits within the HUD- or grantee- identified MID.





Program-Eligible Activities: Interim assistance, public facilities, code enforcement, HCDA 105(a) 2, 3, and 4, applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364) and other applicable notices or guides.

Eligible Applicants/Responsible Entity: City, county, and tribal governments are the eligible applicants and Responsible Entities.

Program Maximum Assistance: \$1,000 per tree planted or removed. IEDA may increase the per tree amount if subrecipients can demonstrate that \$1,000 is insufficient for planting trees and providing care.

Program Estimated Begin and End Dates: The program will launch within 6 months of the grant agreement between HUD and IEDA being signed and conclude within 6 months prior to grant closeout with HUD.

Program Competitive Application Overview: IEDA will publish competitive application rounds for the tree canopy and tree replanting program. All applications within a round will be reviewed, scored, ranked, and awarded based on score. A minimum threshold score will be established to ensure that high-quality projects are selected. This program will be limited to the HUD and State MID areas. The scoring criteria is as follows and each criteria on the application will be graded from 0 to 5 points.

1. Rank the percentage of activities in LMI areas
2. Rank the level of optional local match.
3. Rank the community's Tree Replanting Needs Assessment.
4. Rank the level of detail for proposed program activities.
5. Rank the level of project readiness.
6. Rank the community's proposed steps to Affirmatively Further Fair Housing.

A program guideline will be developed to further expand on the program description, the relevant application form, and guidelines to assist eligible cities and counties with the submission of their requests to the State.

Program Method of Distribution: Funds will be awarded through a competitive process to municipalities, counties, and tribes.

How Mitigation Set-Aside Activities Will Meet Definition of Mitigation: All mitigation activities funded through the program will increase resilience to disasters 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.

4.10.2.2 Generators for Critical Facilities



Table 57: Generators for Critical Facilities Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
Generators for Critical Facilities	\$2,000,000	\$1,300,000	\$700,000

Program Description: Communities were impacted as a result of the 2020 Midwest Derecho and suffered prolonged power outages. Many power lines were downed and, in many cases, power lines damaged homes or fell onto the roadway, blocking traffic or damaging the street. The increasing intensity of storms means that events like the 2020 Midwest Derecho are likely to occur again. Increased investments, whether related to an enhanced energy grid, more renewable options, battery storage, or lower cost energy solutions, will allow the State of Iowa to prepare for the future. As part of the implementation, IEDA will work with subrecipients to ensure that adaptable and reliable technologies are used so that the traditional or solar (or otherwise renewably-powered) generators last for an extended period and can provide value to the community.

Lack of access to power can be detrimental for providing critical services such as emergency medical care at hospitals and shelters for displaced residents. The Generators for Critical Facilities Program will allow communities to make more resilient critical buildings that serve a public safety purpose for local communities and reduce any damage and loss of life from future storm and disaster events.

The generators will keep critical public facilities open in disasters so they can continue to provide services to the residents throughout the community. The generators will be permanent fixtures integrated into the broader systems to ensure continuity of services. Portable generators will not be eligible.

Program Tieback to Disaster: This program addresses the infrastructure-related unmet needs in eligible MID areas impacted by the disaster.

How the Program Will Advance Long-Term Resilience: The program will increase communities’ resilience to future natural disasters by reducing the loss of suffering and hardship and lessening the impact of future natural disasters by providing electricity to a place of shelter or critical service during and after a natural disaster.

How the Program Will Address Disaster-Related Storm Water Management/Other Systems: The program will improve the resiliency of local power systems by providing electricity to places of shelter or critical services during and after a natural disaster.

Promoting Equity in Recovery: The State will prioritize projects that provide essential public services necessary to members of protected classes, HUD-identified vulnerable populations, and historically underserved communities with the fewest resources.

Program National Objective(s):



- Low- to Moderate-Area Benefit or Urgent Need. The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation public infrastructure benefits within the HUD- or grantee- identified MID.

Program-Eligible Activities: HCDA 105(a) 1, 2, and 4 applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364) and other applicable notices or guides.

Eligible Applicants/Responsible Entity: City, county, and tribal governments are the eligible applicants and Responsible Entities.

Program Maximum Assistance: The program will set a maximum award of no more than \$100,000 per generator installed.

Program Estimated Begin and End Dates: The program will launch within 6 months of the grant agreement between HUD and IEDA being signed and conclude within 6 months prior to grant closeout with HUD.

Program Competitive Application Overview: IEDA will publish competitive application rounds for the generators for critical facilities program. All applications within a round will be reviewed, scored, ranked, and awarded based on score. A minimum threshold score will be established to ensure that high-quality projects are selected. This program will be limited to the HUD and State MID areas. The scoring criteria is as follows and each criteria on the application will be graded from 0 to 5 points.

1. Rank the area's LMI percentage.
2. Rank the level of optional local match.
3. Rank the level of public accessibility amid or post disaster.
4. Rank of the level of described community need.
5. Rank the location outside of the 500-year floodplain.
6. Rank the community's proposed steps to Affirmatively Further Fair Housing.
7. Rank the proposed usage of solar or other renewably-powered generators (0-3 points)

A program guideline will be developed to further expand on the program description, the relevant application form, and guidelines to assist eligible cities, counties, and tribes with the submission of their requests to the State.

Program Method of Distribution: Funds will be awarded through a competitive process to municipalities, counties, and tribes.

How Mitigation Set-Aside Activities Will Meet Definition of Mitigation: All mitigation activities funded through the Generators for Critical Facilities program will increase resilience to





disasters 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.

How Mitigation Set-Aside Activities Will Address Current & Future Risks: The Generators for Critical Facilities program will increase communities' resilience to future natural disasters and reduce the long-term risk of loss of life, injury, damage to and loss of property, and lessen residents' suffering and hardship and impact of future natural disasters.





4.10.2.3 Administrative

Table 58: Administrative Budget

Program	Budget	HUD-Identified MID Budget	Grantee-Identified MID Budget
Administrative	\$2,878,300	\$2,302,640	\$575,660

Program Description: The administrative costs necessary for the general administration of the CDBG-DR grant include, but are not limited to, the State and subrecipient’s staff time administering programs; compliance and monitoring of the State’s subrecipients, vendors, and other recipients of funding; and other costs specified as eligible administrative expenses in 24 CFR 570.206. Up to 5% of the overall grant and any program income may be used for administration of the grant, inclusive of administrative costs incurred by IEDA and its subrecipients.

Program-Eligible Activities: Program administrative costs, defined at 24 CFR 570.205 and 570.206, and any applicable waivers or alternative requirements.

Eligible Applicants: State will manage these funds.



5. Appendix

5.1 Certifications

- a. The grantee certifies that it has in effect and is following a residential antidisplacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms, if required by Part 87.
- c. The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be administered with funds under this notice are consistent with its Action Plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR Part 24, except where waivers or alternative requirements are provided for in this notice.
- e. The grantee certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). 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 notices providing waivers and alternative requirements for this grant).
- g. Each State receiving a direct award under this notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including the method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - i. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - ii. 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.
- iii. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70% of the grant amount is expended for activities that benefit such persons.
 - iv. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
 - i. The grantee certifies that it will conduct and carry out the grant in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.
 - j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
 - i. 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
 - ii. 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.
 - k. Each State receiving a direct award under this notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its applicable Public Law Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced therein and its Implementation Plan and Capacity Assessment and related submission to HUD referenced therein.
 - l. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA’s most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR Part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA



data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

- m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K, and R.
- n. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.
- o. The grantee certifies that it will comply with applicable laws.
- p. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

5.2 Waivers

5.2.1 Applicability of Davis-Bacon and Related Acts, Section 3 and Section 504 Ongoing or Pre-Award Non-Residential Commercial Construction Work

If construction work is ongoing when an application for reimbursement or financing of construction costs is submitted, then Davis-Bacon prevailing wage rates are applicable. Under the regulations of the U.S. Department of Labor (DOL) at 29 CFR §1.6(g), where federal assistance is not approved prior to contract award (or the beginning of construction if there is no contract award), Davis-Bacon wage rates apply retroactively to the beginning of construction and must be incorporated retroactively in the contract specifications.

However, if there is no evidence that the owner intended to apply for CDBG-DR assistance prior to contract award or the start of construction, then IEDA is requesting for HUD to request that DOL allow prospective, rather than retroactive, application of the Davis-Bacon wage rates.

The State seeks a similar alternative requirement for the applicability of compliance with Section 3 and Section 504 under these circumstances.

5.2.2 Section 104(d) One-for-One Replacement of Lower-Income Dwelling Units

IEDA is adopting the waiver provided through Section IV.F.1 of the Consolidated Notice. For the purpose of complying with this alternative requirement, IEDA is defining "not suitable for rehabilitation" if any of these conditions apply:

- The property is declared a total loss.
- Repairs would exceed 50% of the cost of reconstruction.



- Homes cannot be rehabilitated or reconstructed in place under existing agency policies and award caps, due to legal, engineering, or environmental constraints, such as permitting, extraordinary site conditions, or historic preservation.

5.3 Summary and Response to Public Comments

The following provides a summary of public comments received for the CDBG- Disaster Recovery Action Plan in response to DR 4557 during the public comment period of May, 5, 2022 through June, 5, 2022. The State of Iowa received a total of 16 number of comments during the 30 calendar days.

Category: Submitted Comments

Question: *Our community lost several trees from the Derecho. We were hoping that we might be included in the eligibility to get some trees for our park and possibly interested residents to help with our tree canopy.*

IEDA Response: In reviewing many public comments in support of extending the tree canopy program to the State MID area, the State has determined to increase program funding from \$3.5 million to \$5.5 million and allocate \$1.1 million to the State MID area.

Question: *Section 4.10 gives the details on the housing program, and the top of page 81 says that the sales price on the new single family LMI homes cannot be greater than \$200,000. My wife and I are engaged in construction projects, and I think the \$200,000 is too restrictive. We have faced 25%+ construction cost increases within the last 12 months and it's not getting easier. What could it hurt the increase the maximum sales price to \$300,000?*

IEDA Response: The State set the per unit sale price limit of \$200,000 in order to ensure CDBG-DR homes would be affordable for an LMI household. In consideration of this public comment, the State examined the most recent average homebuyer data from the Iowa Finance Authority, and industry data for interest rates, total debt ratio, property insurance, etc. and determined that with rapidly rising interest rates, a \$200,000 per unit maximum would not be attainable for enough LMI buyers to sustain a program. An LMI household would also not be able to afford to purchase a \$300,000 home. In response, the State has determined to lower the maximum sale price to \$175,000 and propose a "Mitigation Incentive" of \$25,000 per property to aid in the increased cost of building materials while also ensuring that the homes constructed are more resilient to future natural disasters.

Question: *Can we see a higher rehab hard costs maximum than \$24,999?*

IEDA Response: In preparing the action plan, the State reviewed the Federal Register requirements for rehab programs, in addition to community input on the derecho's enduring impact and determined that \$24,999 was the appropriate maximum for rehabilitation hard costs for the State's proposed non-substantial rehab program in order to ensure that more homes can be rehabbed and not be subject to unnecessary lead abatement expenses. After reviewing



public comment, the State has determined to soften this maximum and prioritize homes with hard rehabilitation costs under \$25,000 and allow for LMI households to receive awards of hard rehabilitation costs not exceeding \$50,000 or 50% of the home's pre-disaster market value, whichever is lower. Total costs, including lead hazard reduction costs and project delivery, will not meet or exceed 50% of the home's pre-disaster market value. The State will review exceptions to the Urgent Need and LMI rehabilitation maximums as needed.

Question: *Can tree removal be funded under rehabilitation costs if the tree presents a danger to the home/structure as a result of the derecho?*

IEDA Response: The Owner-Occupied Rehabilitation program will offer homeowners impacted by the 2020 Derecho with assistance for exterior improvements. CDBG-DR allows for eligible payments on landscaping, sidewalks, garages, and driveways when accompanied with other rehabilitation needed on the property. A thorough review would need to be conducted to determine if tree removal is applicable to the rehabilitation. The Tree Canopy and Tree Replanting Program will only service trees that are on public right of ways.

Question: *Can we see a list of eligible facilities for the generator program, such as lift stations, shared City Hall/community centers, etc.?*

IEDA Response: The State will be preparing a list of eligible facilities for generators in the program guidelines based on CDBG regulations and will convey that information to communities and the public prior to opening applications and after HUD's approval of the public action plan.

Question: Why were Cedar, Jones, and Clinton counties not included in the State MID area?

IEDA Response: In examining unmet needs from the derecho, the State examined FEMA, SBA, State, and other data to assess remaining unmet needs after the derecho. The State only considered counties that received both FEMA Public Assistance and FEMA Individual Assistance, and prioritized rural counties with higher unmet needs that may lack the resources to fully recover that urban counties may have. The State also examined the storm event for its greatest intensities, recorded generally over Benton and Linn counties, as well as its damage to socially vulnerable low-income populations. The State also considered counties who experienced recent natural disasters in which the derecho exacerbated the damage. Marshall County is still recovering from an EF-3 tornado that caused devastating damage in downtown Marshalltown and its low-income older neighborhoods. Benton and Tama Counties' tree canopies are still recovering from a derecho event in 2011. The State also considered counties with higher lower-income populations to target this funding towards. Marshall, Tama, and Benton counties met this criteria. If further funding becomes available, the State would reconsider expanding the State MID area.

Question: *Rental housing: is the conversion of existing buildings, possibly upper story housing units allowed for the \$75k grant assistance?*



IEDA Response: We can look into adaptive reuse of a building not currently used for housing but we cannot use these funds for existing housing that needs rehabbed. If a building downtown does not have housing units in it currently, we could do an adaptive reuse to add new housing units.

Question: *For new subdivision: can a city or non-profit serve as developer & owner for these new lots?*

IEDA Response: Infrastructure will need to be turned over to the City but the developer can be the City, nonprofit, or a for-profit developer. Note that if the City decides to develop the parcel on its own and not use a nonprofit or for-profit developer, it will need to procure for the contractors who work on the project.

Question: *Can the generator program be used as local match to FEMA?*

IEDA Response: While CDBG-DR funds can be used to provide the state and local match to FEMA programs, the State does not anticipate it being necessary for the generator program. A 2022 FEMA appropriation increased the FEMA match to 90%, with the remaining 10% provided by the state. Iowa Homeland Security and Emergency Management Department staff anticipate local governments in the disaster area receiving 90% for FEMA generator programs and the State has the funding in place for the remaining 10% State share. If the federal share is reduced from 90% on eligible applicants, the State will revisit this matter.

Question: *Is the funding just to buy the generator or does it include the other possible components – installation, crane lifting off the generator, cement pad, electrical switches, etc? Certainly a good part of this is Davis-Bacon related stuff.*

IEDA Response: Eligible expenses will include the purchasing and installation of the generator, parts of which could be subject to Davis Bacon.

Question: *Will the State consider revising the 100 and 500-year floodplain restriction to allow for areas in which flood controls have been built and will be certified but is not yet completed? If we don't build affordable housing in areas like NewBo now, the fear is that they will be built out and LMI households will be priced out by the time the flood control structures are certified.*

IEDA Response: For the LIHTC program, the State has approved a waiver of State prohibitions against new construction in the floodplain when flood control structures have been built but are still in the certification process. The State has considered this request for the 2020 Derecho CDBG-DR program but, in considering the State's previous CDBG-DR buyout projects after floods in 2008 and 2019, many of which occurred within the 500-year floodplain, the State has determined that new construction outside of the 100 and 500-year floodplains maximizes the federal investment's benefit to the community of building new affordable, resilient housing for low-to-moderate households outside of flood hazard areas. The State has evaluated the Federal Register requirements for constructing in the 100-year floodplain and considers them to



be too burdensome and costly for development under the proposed programs in this action plan. The State will consider exceptions to its prohibition against new construction in the 500-year floodplain if flood control structures are being built that can demonstrate future protection from mapped 500-year flood risks and, in the interest of equity, if the applicant can demonstrate that the proposed project will help LMI households afford to live in areas that they may not be able to afford without DR-funded new affordable, resilient housing.

Category: Public Outreach Events

Comment: *Commentors noted a language barrier in understanding official communications, resulting in residents missing out on opportunities in the immediate response to the derecho.*

IEDA Response: The State will work with subrecipients to ensure that language barriers are addressed and overcome in implementing the programs proposed in this action plan.

Date Received: May 12th (Refugee Outreach Meeting)

Comment: *My house was damaged by the Derecho and collapsed. I was outside with no shelter. I was shocked because this big city and organization could not come to people's rescue. We did not have insurance for the house, and got had no assistance.*

IEDA Response: The State will offer a rehabilitation program and will work with subrecipients to conduct outreach to the refugee community to access the assistance.

Comment: *Families had to leave Cedar Rapids. We want families to stay in Cedar Rapids. But when people do not get help, they cannot. People did not want to leave the apartment.*

IEDA Response: The State will be offering new housing programs and, if awarded to Cedar Rapids, will work with the City to conduct outreach to the refugee community for accessing these new units.

Question: *Are we planning to have an application late this fall? Are you hoping to break down the funding over multiple years? Give me kind of a breakdown of what we can expect from a fiscal standpoint.*

IEDA Response: We will launch our programs when we get our grant agreement signed by HUD. So, we would anticipate having applications open in late fall of this year for this program. It is our full goal and intention to get this program up and running by construction season next year. Applications will be submitted by the city, so reach out to your local city or county to initiate some discussions. We have been meeting with local governments who have been meeting with developers to discuss some possibilities based on how they know this program is operated. We have our scoring criteria and what we're looking for in a housing application in our action plan. We are going to be up front and transparent along the way, as we know our application window may be short but we'll anticipate making sure developers and cities are very well aware of what we're looking for, even before we open applications. We will attempt to award the full amount in



the first housing round, but if there are funds remaining, we will have a second or third housing round. We have six years to complete all the activities in this grant before closing it out with HUD. But we will be very front-heavy, front-heavy loaded with just dispersing these funds.

Date Received: May 26th (Public Hearing)

Question: *My question is about the money that is available for the purchase of power units or generators. Our need for a generator at the fire station is now. If we wait until fall to fill out the application and then are granted the funds, can that be used to reestablish the money that we spent out of our Rainy Day fund to purchase a generator? Or do we have to wait until that time?*

IEDA Response: Unfortunately, you would have to wait because we don't have access to these funds until HUD approves our action plan, and HUD signs our grant agreement. I don't know if your community applied for a program through FEMA for generators as there are some applications being taken for that. That could be a more immediate response, depending on what their timeline is. But unfortunately, we can't reimburse for that cost at this time, because we don't have access to those funds right now.

Date Received: May 26th (Public Hearing)

Question: *Post-flood 2008, there was a program called "The Roots", that was a CDBG-funded program that a lot of local builders took advantage of and utilized. Sounds very similar to this. We were targeting homes at the time; I think they were \$150,000 - \$180,000. For the Owner-occupied housing program, there's a \$100,000 total maximum award for a single-family housing; give me a level of how that works. You know somebody making \$50,000 a year would qualify for the 80th percentile; how's that funding to be spent? Is it essentially coming back to the home buyer as a grant with the portion to the developer to keep that price lower? Or how does that metric look?*

IEDA Response: The 2008 funding was through CDBG-DR so there will be some similarities. For the for-sale new housing construction program we have imposed a cap on the purchase price of those homes at \$175,000, and are providing down payment assistance to low-to-modern income people get into the homes. We are not fully subsidizing the construction of those homes, but we're providing a \$100,000 per unit incentive to developers to construct those homes. So, this will help to reduce the cost of constructing those homes and be able to have them sold at a price that is more affordable to low-to-modern income people. So, \$100,000 incentive applies to the developer, whereas the homeowner will not pay more than \$200,000 for the home. (This was revised down to a \$175,000 purchase price after further analyzing the purchasing power of LMI households amid rising interest rates).

5.4 Data Sources/Methodologies

5.4.1 Housing Unmet Needs Calculation

For its unmet housing needs calculation, HUD considers Major Low, Major High, and Severe damage categories for both owner and renter households, which are defined in the Federal Register Notice for calculating unmet recovery needs. For owner-occupied properties, which means anyone with real property damages above \$9,000 or \$3,000 in personal property



damages. For renter-occupied properties, that threshold includes anyone with more than \$2,000 in personal property damages. There are additional details below on the damage categories by owner-occupied and renter- (tenant) occupied households. Generally, FEMA categorizes manufactured homeowners who owned their unit as owners, even when their unit is placed on leased land.

Owner-Occupied Households

Real or Personal Property Damage Categories

- Minor Low:
 - Less than \$3,000 of FEMA-inspected real property damage or less than \$2,500 of FEMA-inspected personal property damage
- Minor High:
 - \$3,000 to \$7,999 of FEMA-inspected real property damage or \$2,500 to \$3,499 of FEMA-inspected personal property damage
- Major Low:
 - \$8,000 to \$14,999 of FEMA-inspected real property damage or \$3,500 to \$4,999 of FEMA-inspected personal property damage
- Major High:
 - \$15,000 to \$28,800 of FEMA-inspected real property damage or \$5,000 to \$9,000 of FEMA-inspected personal property damage
- Severe:
 - Greater than \$28,800 of FEMA-inspected real property damage or greater than \$9,000 of FEMA-inspected personal property damage

Renter-Occupied Households

Personal Property

- Minor Low:
 - Less than \$1,000 of FEMA-inspected personal property damage
- Minor High:
 - \$1,000 to \$1,999 of FEMA-inspected personal property damage
- Major Low:
 - \$2,000 to \$3,499 of FEMA-inspected personal property damage
- Major High:
 - \$3,500 to \$7,500 of FEMA-inspected personal property damage
- Severe:
 - Greater than \$7,500 of FEMA-inspected personal property damage



While the FEMA IA data are incomplete in presenting the true level of impact on owners and renters, it is the best available dataset available to the State that distinguishes between impacted owners and renters. The table below demonstrates the number of owners and renters who:

- Applied to FEMA IA (Total Registrants).
- Had a FEMA Verified Loss Greater than \$0 (Total FVL over \$0).
- Experienced Major to Severe Levels of FEMA Verified Loss (Total Major to Severe).

Table 59: FEMA Verified Loss for Owners and Renters

	Damage Category	No. of Damaged Properties	Real Property FVL	Personal Property FVL	Total FVL
Owner	Severe	4	\$149,920.00	\$21,378.45	\$171,298.45
	Major High	225	\$3,449,633.15	\$433,661.26	\$3,883,294.41
	Major Low	86	\$937,188.44	\$150,224.03	\$1,087,412.47
	TOTAL	315	\$4,536,741.59	\$605,263.74	\$5,142,005.33
Renter	Severe	104	\$15,379.92	\$930,110.69	\$945,490.61
	Major High	635	\$0.00	\$3,144,517.69	\$3,144,517.69
	Major Low	638	\$0.00	\$1,710,802.98	\$1,710,802.98
	TOTAL	1,377	\$15,379.92	\$5,785,431.36	\$5,800,811.28

Reference: [Data from FEMA FIDA \(FEMA Information Data and Analysis\) DR-4557, February 26, 2022.](#)

In order to create resilient and sustainable communities that can effectively mitigate against future disaster impacts and a changing climate, IEDA calculated the average infrastructure cost associated with new housing development. Using Building Advisor, IEDA was able to account for high and low ranges of costs for water/sewer, septic, utilities, and permitting costs, which came to an average infrastructure cost of \$70,480. The breakdown and averaging of these site development costs can be found in the table below. These estimates informed how much IEDA will be compensating the infrastructure that supports the development of new housing.



Table 60: Typical Site Development Costs

Description	Municipal Water/Sewer		Onsite Water/Septic	
	Low	High	Low	High
Permitting & Fees				
Building, inspection, certificate of occupancy (CO)	\$300	\$5,000	\$300	\$5,000
Soil test (perc testing)			\$100	\$500
Septic system			\$100	\$3,000
Well			\$100	\$1,000
Impact fee (if charged)	\$5,000	\$25,000	\$5,000	\$25,000
Driveway	\$50	\$500	\$50	\$500
Water & Sewer Connection: (total include tap fees, trenching, piping – some work may be done by private contractors)				
Municipal water	\$700	\$20,000		
Municipal sewer	\$1,000	\$15,000		
Utilities				
Electrical connection	\$1,000	\$5,000	\$1,000	\$5,000
Survey	\$300	\$3,000	\$300	\$3,000
Engineering inspection	\$0	\$1,000	\$0	\$1,000
Water well				
Drill, casing, and cap (per ft)		\$40	\$15	\$40
Development, pump and wiring, trenching, piping, pressure tank, disinfecting, etc.			\$2,000	\$5,000
Water treatment (if needed)			\$1,000	\$5,000
Septic System				
Soil testing			\$300	\$1,000
Design			\$500	\$1,000
Installation			\$5,000	\$30,000



Description	Municipal Water/Sewer		Onsite Water/Septic	
	Low	High	Low	High
Clearing	\$0	\$2,500	\$0	\$2,500
Earthwork				
Grading: Rough and final (typical site)	\$2,500	\$5,000	\$2,500	\$5,000
Site drainage (wet or steep sites)	\$1,000	\$5,000	\$1,000	\$5,000
Steep site: Grading, cut and fill	\$1,000	\$5,000	\$1,000	\$5,000
Retaining walls (per sq ft of wall face)	\$20	\$50	\$20	\$50
Landscaping	\$3,000	\$20,000	\$3,000	\$20,000
Paving (asphalt or concrete)	\$3,000	\$10,000	\$3,000	\$10,000
TOTAL	\$18,870	\$122,090	\$26,285	\$133,590
Average Infrastructure Cost				\$70,480

While rehabilitation of structures is certainly an option under CDBG-DR programming, IEDA’s analysis of impacted structures found that a significant percentage of affected structures in impacted communities is older housing stock built prior to the adoption of updated building codes and mitigation standards. As demonstrated in the table below, IEDA found that significant structures, if rehabilitated, would not meet HUD’s and IEDA’s mitigatory and resilient goals. By building new structures, IEDA ensures that resilient standards are met.

Table 61: Age of Housing Stock in Impacted Counties

Area	% of Homes Built Before 1940	Margin of Error (+/-)
United States	13.5	0.1
Benton	34.7	2.2
Linn	15.4	0.7
Marshall	36.5	2.0
Tama	41.0	2.1

Reference: [American Community Survey Housing Age](#)

5.4.2 Iowa Enhanced Hazard Mitigation Plan (EHMP)

The risk assessment for the EHMP provides the factual basis for developing a mitigation strategy for the State. Iowa’s foundation for hazard mitigation is based on a hazard analysis and risk assessment that is comprehensive and multi-hazard. The risk assessment identifies 20



hazards based on an analysis of federal risk assessment guidance, examination of past disasters, and other resources.

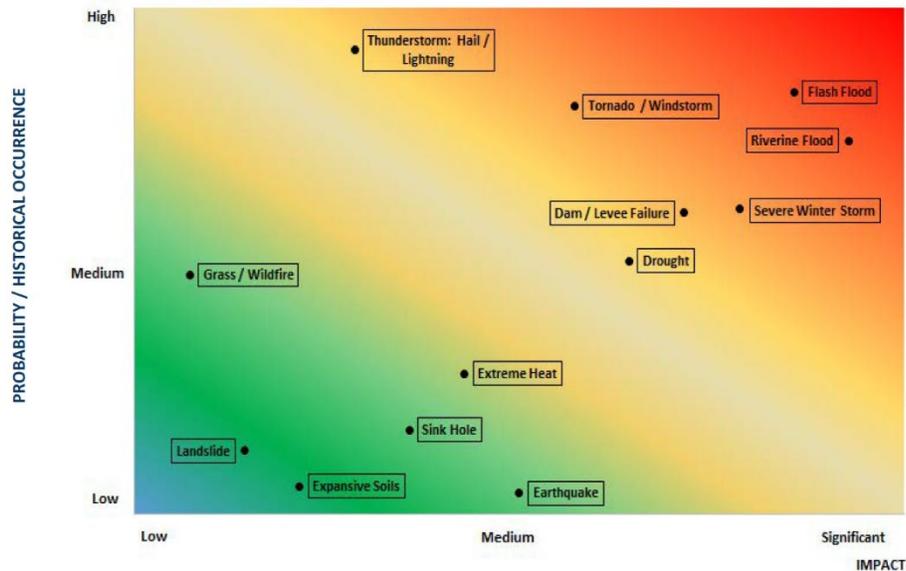
Each natural hazard profile includes a general description of the hazard; historical occurrences in the State; the location, probability, and extent of the hazard within the State; a summary of vulnerability, including the most vulnerable jurisdictions within the State; and a summary of the problem and identification of possible actions to mitigate the hazard. The 20 hazards are included in Table 62 and the quantified relative statewide risk of natural hazards is included as Figure 21.

Table 62. EHMP Identified Hazards

Type	Hazard
Natural	Dam/Levee Failure
	Drought
	Earthquake
	Expansive Soils
	Extreme Heat
	Flooding – River
	Flooding – Flash
	Grass or Wildland Fire
	Landslides
	Severe Winter Storms
	Sinkholes
	Thunderstorm – Hail and Lightning
	Tornado/Windstorm
Human-Caused/Biological	Animal/Plant/Crop Disease
	Hazardous Materials Incident
	Infrastructure Failure
	Pandemic Human Disease
	Radiological Incident
	Terrorism
	Transportation Incident



Figure 21. Relative Statewide Risk of Natural Hazards



In addition, the EHMP identifies climate risks and notes climate change trends in Iowa, including changes in temperature, changes in precipitation, and a summary of climate change in Iowa and effects on hazards.

5.4.3 Benton County Multi-Jurisdictional Hazard Mitigation Plan

Benton County has produced a Multi-Jurisdictional Hazard Mitigation Plan that profiles the natural, human-caused, and technological hazards that could impact the county. Each natural hazard profile includes a definition and description of the hazard; the probability, magnitude, and severity of the hazard; the warning time for the hazard; and hazard duration.

The risk assessment identifies 15 hazards based on an analysis of the State of Iowa 2018 Hazard Mitigation Plan. The 15 hazards are as follows:

- Extreme Heat
- Flash Flood
- Severe Winter Storm
- Thunderstorm/Lightning/Hail
- Tornado/Windstorm
- Grass/Timber/Wildland Fire
- River Flood
- Drought
- Transportation Incident



- Infrastructure Failure
- Hazardous Materials Incident
- Terrorism
- Human Disease
- Animal/Plant/Crop Disease
- Structural Fire

5.4.4 Linn County Multi-Jurisdictional Hazard Mitigation Plan

Linn County has produced a Multi-Jurisdictional Hazard Mitigation Plan that profiles the natural, human-caused, and technological hazards that could impact the county. Each natural hazard profile includes a description of the geographic areas affected, historical occurrences in the county, the probability and magnitude of future events, and event duration. The human-caused and technological hazard profiles include similar topics of discussion; however, not all aspects can be quantified due to limited data available and the imprecise nature of the human-caused and technological hazards.

The risk assessment identifies 19 hazards based on an analysis of the State of Iowa 2013 Hazard Mitigation Plan. The 19 hazards are as follows:

- Animal, Plant, and Crop Disease
- Drought
- Earthquake
- Expansive Soils
- Extreme Heat
- Flood
- Grass or Wildland Fire
- Human Disease
- Landslide
- Severe Winter Storm
- Sinkholes
- Thunderstorm, Lightning, and Hail
- Tornado and Windstorm
- Hazardous Materials Incident
- Infrastructure Failure
- Levee and Dam Failure



- Radiological Incident
- Transportation Incident
- Terrorism

5.4.5 Marshall County Multi-Jurisdictional Hazard Mitigation Plan

Marshall County has produced a Multi-Jurisdictional Hazard Mitigation Plan that profiles the natural, human-caused, and technological hazards that could impact the county. Each natural hazard profile includes a description of the geographic areas affected, historical occurrences in the county, the probability and magnitude of future events, and event duration. The human-caused and technological hazard profiles include similar topics of discussion; however, not all aspects can be quantified due to limited data available and the imprecise nature of the human-caused and technological hazards.

The risk assessment identifies 22 hazards based on an analysis of the State of Iowa 2013 Hazard Mitigation Plan. The 22 hazards are as follows:

- Animal, Plant, and Crop Disease
- Drought
- Earthquake
- Expansive Soils
- Extreme Heat
- Flood
- Grass or Wildland Fire
- Human Disease
- Landslide
- River Flooding
- Severe Winter Storm
- Sinkholes
- Thunder, Lightning, and Hail
- Tornado
- Windstorm
- Dam/Levee Failure
- Hazardous Materials Incident
- Levee and Dam Failure
- Radiological Incident



- Transportation Incident
- Infrastructure Failure
- Terrorism

5.4.6 Tama County Hazard Mitigation Plan

Tama County has produced a Hazard Mitigation Plan that profiles the natural, human-caused, and technological hazards that could impact the county. Each natural hazard profile includes a definition of the hazard, general description of the hazard, historical occurrence of the hazard, the probability of the hazard occurring again in the future, the vulnerability of people and property that would be affected by the hazard event, the severity of the hazard's potential impact on human life and property, and the speed of onset or amount of warning time before the hazard occurs.

The risk assessment identifies 17 hazards based on an analysis of the State of Iowa 2013 Hazard Mitigation Plan. The 17 hazards are as follows:

- Animal, Plant, and Crop Disease
- Drought
- Extreme Heat
- Flash Flood
- Grass or Wildland Fire
- Human Disease
- River Flooding
- Severe Winter Storm
- Thunder, Lightning, and Hail
- Tornado
- Windstorm
- Hazardous Materials Incident
- Levee and Dam Failure
- Radiological Incident
- Transportation Incident
- Infrastructure Failure
- Terrorism



5.5 Data Sources Referenced in the Action Plan

Owner Occupied Households:

- Minor Low:
 - Less than \$3,000 of FEMA-inspected real property damage or less than \$2,500 of FEMA-inspected personal property damage
- Minor High:
 - \$3,000 to \$7,999 of FEMA-inspected real property damage or \$2,500 to \$3,499 of FEMA-inspected personal property damage
- Major Low:
 - \$8,000 to \$14,999 of FEMA-inspected real property damage or \$3,500 to \$4,999 of FEMA-inspected personal property damage
- Major High:
 - \$15,000 to \$28,800 of FEMA-inspected real property damage or \$5,000 to \$9,000 of FEMA-inspected personal property damage
- Severe:
 - Greater than \$28,800 of FEMA-inspected real property damage or greater than \$9,000 of FEMA-inspected personal property damage

Renter Occupied Households:

- Minor-Low:
 - Less than \$1,000 of FEMA inspected personal property damage
- Minor-High:
 - \$1,000 to \$1,999 of FEMA inspected personal property damage
- Major-Low:
 - \$2,000 to \$3,499 of FEMA inspected personal property damage
- Major-High:
 - \$3,500 to \$7,500 of FEMA inspected personal property damage
- Severe:
 - Greater than \$7,500 of FEMA inspected personal property damage

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 - http://www.ecicog.org/uploads/2/6/9/0/26907680/linn_county_hazmit_2019_-_amendment_1_-_web.pdf
- Marshall County Multi-Jurisdictional Hazard Mitigation Plan
 - <https://protectingmarshallcountyiowa.org/wp-content/uploads/2021/11/Marshall-County-HMP-10292021-Draft.pdf?msclkid=c682dd06becd11ecbb427e2bf70c9c5c>
- Tama County Multi-Jurisdictional Hazard Mitigation Plan
 - <https://www.tamacounty.org/Documents/2021/EmergMgmt/Tama%20County%20HMP%20for%20Public%20Review.pdf>

Table Data Sources:

- 2020 Decennial Census Redistricting Data
- ACS 5-Year Estimates (2015–2019)
- ACS 5-Year Estimates (2014–2018)
- ACS 5-Year Estimates (2011–2015)
- [HUD Fair Market Rent Documentation System](#)





5.6 Important Definitions and Terms

AMI: Area Median Income

CBDO: Community-Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant – Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

COG(s): Councils of Government

CP: Citizen Participation

DOB: Duplication of Benefits

DRGR: Disaster Recovery Grant Reporting System

FEMA: Federal Emergency Management Agency. This program provides funding to State, local, tribal, and territorial governments so that they can rebuild in a manner that reduces or mitigates future disaster losses in their communities.

HCD Act: Housing and Community Development Act of 1974, as amended

HMGP: (FEMA) Hazard Mitigation Grant Program

HSEMD: Iowa Homeland Security and Emergency Management Department

HUD: U.S. Department of Housing and Urban Development

IA: (FEMA) Individual Assistance. This program provides financial help or direct services to those who have necessary expenses and serious needs if they are unable to meet these needs through other means.

IEDA: Iowa Economic Development Authority

LEP: Limited English Proficiency

LIHTC: Low-Income Housing Tax Credit

LMI: Low- to Moderate-Income Persons

NFIP: National Flood Insurance Program





PA: (FEMA) Public Assistance. This program provides supplemental grants to State, tribal, territorial, and local governments, as well as certain types of private nonprofits so that communities can quickly respond to and recover from major disasters or emergencies.

RE: Responsible Entity

RFP: Request for Proposal

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of General Local Government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

5.7 Standard Form 424

This is a standard form required for use as a cover sheet for submission of grant applications for federal assistance that provides required information about the applicant organization. The Iowa Economic Development Authority submits this form to HUD at the time of Action Plan submission through the HUD DRGR system.



Amendment 1- Non-Substantial

The State of Iowa is submitting Amendment 1, a non-substantial amendment, to HUD for its 2020 CDBG-DR program. This amendment is being submitted based upon feedback from cross-cutting partners at HUD to better align the plan's compliance with HUD expectations on fair housing and environmental justice. The State is also making a few technical corrections to programs, including the scoring criteria, descriptions, and funding amounts-based upon ensuring the programs operate efficiently in addressing unmet needs from the derecho.

This amendment is non-substantial as it does not meet the 2020 Derecho CDBG-DR Action Plan definition of a substantial amendment. That definition is as follows:

A change to this Action Plan is considered substantial if it meets the following criteria:

- *A change in program benefit or eligibility criteria,*
- *The addition or deletion of an activity*
- *The allocation or reallocation more than \$5 million or greater of a program budget, and*
- *A proposed change to an adopted method of distribution*

Proposed Changes

See the proposed changes to the Action Plan in the table on the following page:



Section	Description
2.2.4	<p>Incorporated revisions as required by HUD Fair Housing & Equal Opportunity (FHEO) in</p> <ol style="list-style-type: none"> 1. Providing an assessment of the potential unjustified discriminatory effects on or failure to benefit vulnerable populations and racial and ethnic communities in proportion to their needs 2. Including required data on number & percentage of persons belonging to Federally protected classes under the Fair Housing Act (race, color, national origin, sex, sexual orientation, gender identity, familial status, and disability); indigenous populations and tribal communities; racially and ethnically concentrated areas of poverty; and historically distressed and underserved communities. 3. Describes how the State of Iowa will ensure that subrecipients comply with their federal fair housing and nondiscrimination requirements
3.3	<p>Added language recommended by the HUD Office of Environment & Energy specifying that projects shall consider water & resource efficiencies, improved air quality filtration, and enhanced Operation & Maintenance plans. All of which is currently covered by the Iowa Green Streets Criteria.</p>
3.6 & 3.8	<p>Added language recommended by the HUD Office of Environment & Energy affirming that projects will consider HUD's new Environmental Assessment Factors eGuide on Climate Change</p>
4.10.1.1	<p>Clarified affordability period for single-family homes built for new construction to the definition included elsewhere in the action plan</p>
4.10.1.4	<p>Update to scoring criteria, clarified that interior rehabilitation work as an eligible activity</p>
4.10.2.1,	<p>Update to scoring criteria, increased per tree planted or stump removed incentive from \$600 to \$1,000 per unit.</p>
4.2, 4.7, 4.10.1.2, 4.10.1.3, 4.10.2.2, 4.10.2.3	<p>Typo and spelling corrections, edits for per tree unit to \$1,000 per unit maximum award</p>



Steven Stransky

From: Wilkerson, Jo A <Jo.A.Wilkerson@hud.gov>
Sent: Saturday, October 29, 2022 8:21 AM
To: Steven Stransky
Cc: Foulds, Phyllis J
Subject: HUD Acknowledgement of Action Plan Amendment 1 - Non-Substantial for State of Iowa's 2020 CDBG-DR Grant

Dear Steven,

This email serves as acknowledgement of Action Plan Amendment (APA) – Non-substantial for the State of Iowa 2020 CDBG-DR grant.

The purpose of the APA 1 is to make the following changes to the 2020 Action Plan:

Section 2.24

Incorporated revisions as required by HUD Fair Housing & Equal Opportunity (FHEO) in:

- Providing an assessment of the potential unjustified discriminatory effects on or failure to benefit vulnerable populations and racial and ethnic communities in proportion to their needs
- Including required data on number & percentage of persons belonging to Federally protected classes under the Fair Housing Act; indigenous populations and tribal communities; racially and ethnically concentrated areas of poverty; and historically distressed and underserved communities.
- Describes how the State of Iowa will ensure that subrecipients comply with their federal fair housing and nondiscrimination requirements

Section 3.3

- Added language recommended by the HUD Office of Environment & Energy specifying that projects shall consider water & resource efficiencies, improved air quality filtration, and enhanced Operation & Maintenance plans. All of which is currently covered by the Iowa Green Streets Criteria.

Section 3.6 & 3.8

- Added language recommended by the HUD Office of Environment & Energy affirming that projects will consider HUD's new Environmental Assessment Factors eGuide on Climate Change

Section 4.10.1.1

- Clarified affordability period for single-family homes built for new construction to the definition included elsewhere in the action plan

Section 4.10.1.4

- Update to scoring criteria, clarified that interior rehabilitation work as an eligible activity

Section 4.10.2.1

- Update to scoring criteria, increased per tree planted or stump removed incentive from \$600 to \$1,000 per unit.

Section 4.2, 4.7, 4.10.1.2, 4.10.1.3, 4.10.2.2, 4.10.2.3





EQUAL HOUSING
OPPORTUNITY



- Typo and spelling corrections, edits for per tree unit to \$1,000 per unit maximum award

HUD acknowledges that the APA is non-substantial in accordance with the requirements in the State's 2020 Acton Plan. The State is not changing a program benefit or eligibility criteria; adding or deleting an activity; allocating or reallocating more than \$5 million or greater of a program budget; or proposing a change to an adopted method of distribution.

Thank you.

Jo Ann Wilkerson

Jo Ann Wilkerson
Community Planning and Development Specialist
Disaster Recovery and Special Initiatives Division
Office of Block Grant Assistance
U.S. Department of Housing and Urban Development
307 W. 7th Street, Suite 1000
Fort Worth, TX 76102
(817) 978-5949





EQUAL HOUSING
OPPORTUNITY



Amendment 2- Non-Substantial

February 9, 2023

The State of Iowa is submitting Amendment 2, a non-substantial amendment, to HUD for its 2020 CDBG-DR program. This amendment is being submitted based on reviews of submitted applications for the new housing construction programs. The State is also making a few technical corrections to ensure programs operate efficiently in addressing unmet needs from the derecho.

This amendment is non-substantial as it does not meet the 2020 Derecho CDBG-DR Action Plan definition of a substantial amendment. That definition is as follows:

A change to this Action Plan is considered substantial if it meets the following criteria:

- *A change in program benefit or eligibility criteria,*
- *The addition or deletion of an activity*
- *The allocation or reallocation more than \$5 million or greater of a program budget, and*
- *A proposed change to an adopted method of distribution*

Proposed Changes

See the proposed changes to the Action Plan in the table on the following page:



Section	Description
2.2.2	Clarified the definition of Fair Market Rents to be the HOME 65% Rent Limits and updated figures displayed in the Action Plan for the HUD MID and State MID Areas
4.10.1.1	Allowing for an increase in the maximum sales price beyond \$175,000 when financial resources are paired to ensure the home is affordable to LMI households.

Table 49: Program Budget

Project	Program	Budget Allocation	HUD MIDs (80%)	State MIDs (20%)	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	New Resilient, Affordable Single-Family Housing	\$20,772,308	\$16,768,317	\$4,003,991	36.0%	\$125,000 per unit	LMI Housing	125 units
	Infrastructure to Support Housing	\$4,047,384	\$4,047,384	\$0	0.70%	Up to \$70,000	LMI Area	57 units
	Owner-Occupied Rehabilitation	\$2,500,000	\$2,500,000	\$0	4.3%	\$50,000 per LMI unit	LMI Housing or Urgent Need	50 units
	New Housing – Rental	\$19,868,008	\$17,093,008	\$2,775,000	34.5%	\$90,000 per unit	LMI Housing	209 units
Infrastructure	Tree Canopy and Tree Replanting Program	\$5,500,000	\$4,400,000	\$1,100,000	9.6%	\$1,000 per tree	LMI Area or Urgent Need	5,239 trees
	Generators for Critical Facilities	\$2,000,000	\$1,300,000	\$700,000	3.5%	\$100,000	LMI Area or Urgent Need	20 generators
Administrative	Administrative	\$2,878,300	\$2,302,640	\$575,660	5.0%	N/A	N/A	N/A
TOTAL BUDGET		\$57,566,000	\$48,411,349	\$9,154,651	100.0%			

Reallocation:

- \$1,237,540 from the Infrastructure to Support Housing State MID to New Housing-Rental HUD Mid.
- \$130,468 from the Infrastructure to Support Housing HUD MID to New Housing-Rental HUD MID.
- \$768,317 from the Infrastructure to Support Housing HUD MID to New Resilient, Affordable Single-Family Housing HUD MID.
- \$3,991 from the Infrastructure to Support Housing HUD MID to New, Resilient Affordable Single-Family Housing State MID.

Estimated Outcomes:

- Reduction of for-sale housing from 137 units to 125 units due to increase in down payment assistance to maximum award of 20% down payment to support housing units amid higher interest rates
- Reduction of units for infrastructure in support of housing from 88 units to 57 units
- Increase of units for rental housing from 194 units to 209 units



Steven Stransky

From: Wilkerson, Jo A <Jo.A.Wilkerson@hud.gov>
Sent: Monday, February 13, 2023 6:05 PM
To: Steven Stransky
Subject: Acknowledgement 2020 CDBG-DR Non-Substantial Amendment 2

Dear Steven,

This email serves as acknowledgement of Action Plan Amendment (APA) 2 – Non-substantial for the State of Iowa 2020 CDBG-DR grant. This acknowledgement will also be submitted through DRGR.

The purpose of the APA 2 is to make the following changes to the 2020 Action Plan:

Section 2.2.2

Clarified the definition of Fair Market Rents to be the HOME 65% Rent Limits and updated figures displayed in the Action Plan for the HUD MID and State MID areas.

Section 4.10.1.1

Allowing for an increase in the maximum sales price beyond \$175,000 when financial resources are paired to ensure the home is affordable to LMI households.

In addition, APA 2 reallocates funds from Infrastructure to Support Housing to New Housing-Rental and New, Resilient Affordable Housing-Single Family Housing in the HUD and State MID areas. The reallocation is being made in response to the State's reviews of submitted applications for the new housing programs. The reallocation includes:

- \$1,237,540 from the Infrastructure to Support Housing State MID to New Housing-Rental HUD MID
- \$130,468 from the Infrastructure to Support Housing HUD MID to New Housing-Rental HUD MID
- \$768,317 from the Infrastructure to Support Housing HUD MID to New Resilient, Affordable Single-Family Housing HUD MID
- \$3,991 from the Infrastructure to Support Housing HUD MID to New, Resilient Affordable Single-Family Housing State MID

The estimated outcomes for the reallocation of funds are:

- Reduction of for-sale housing from 137 units to 125 units due to increase in down payment assistance to maximum award of 20% down payment to support housing units
- Reduction of units for infrastructure in support of housing from 88 units to 57 units
- Increase of units for rental housing from 194 units to 209 units

HUD acknowledges that the APA 2 is non-substantial in accordance with the requirements in the State's 2020 Action Plan. The State is not changing a program benefit or eligibility criteria; adding or deleting an activity; allocating or reallocating more than \$5 million or greater of a program budget; or proposing a change to an adopted method of distribution.





Thank you.

Jo Ann

Jo Ann Wilkerson
Community Planning and Development Specialist
Office of Block Grant Assistance
U.S. Department of Housing and Urban Development
307 W. 7th Street, Suite 1000
Fort Worth, TX 76102
(817) 978-5949

From: Steven Stransky <Steven.Stransky@iowaEDA.com>
Sent: Thursday, February 9, 2023 4:02 PM
To: Wilkerson, Jo A <Jo.A.Wilkerson@hud.gov>
Subject: <External Message> 2020 CDBG-DR Non-Substantial Amendment

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have concerns about the content of the email, please send it to phishing@hud.gov or click the Report Phishing Button on the Outlook ribbon or Phishing option within OWA.

Hi, Jo Ann.

Our housing application round for the grant just closed and I've submitted a non-substantial amendment through DRGR. Here's an attachment that also outlines what we've proposed in the amendment. Please let me know of any questions.

Sincerely,

STEVEN STRANSKY | Disaster Recovery Team Lead
IOWA ECONOMIC DEVELOPMENT AUTHORITY
1963 Bell Avenue, Suite 200 | Des Moines, Iowa 50315
+1 (515) 348-6204 | steven.stransky@iowaeda.com

