

The State of Iowa

Action Plan for Disaster Recovery Spring 2019 Flooding (DR-4421)

March 2022

Submitted to HUD: June 2020

Approved by HUD: August 7, 2020

Amendment #1 (Non-Substantial): December 2020

Amendment #2 (Substantial): January 2022

Amendment #3 (Non-Substantial): March 2022



Contents

Executive Summary.....	4
Introduction	4
Proposed Program Budget Summary	6
Section One – Disaster Introduction.....	7
Appropriations Act.....	7
Summary of Impact and Presidentially Declared Counties	8
FEMA Eligibility Map	9
Counties Eligible for FEMA Assistance.....	10
Section Two: Iowa Disaster Recovery.....	11
Iowa Disaster Recovery Framework	11
Governor’s Flood Recovery Advisory Board	12
Section Three: Overall Storm Impact.....	17
Pre-Disaster Conditions.....	17
People.....	18
Economic Conditions.....	18
Storm Inundation	23
Section Four: Impact and Unmet Needs Assessment.....	24
General Impact.....	24
Housing.....	25
Infrastructure	27
Economic Revitalization	28
State Flood Mitigation Board	29
Section Five: Method of Distribution & Connection to Unmet Need	31
Method of Distribution	31
Policies and Procedures	32
Training and Technical Assistance.....	32
Cross-Cutting Regulations	32
Application Evaluation.....	38
CDBG-DR Program National Objectives	38
Housing Program Summaries.....	41
Buyouts FEMA Match.....	41
New Housing Production	42
Down-payment Assistance	46
Infrastructure	46
Planning.....	47
Projections of Expenditure and Outcomes	49

FEMA Match Buyouts.....	49
Rental Housing New Construction	49
Single Family New Construction	50
Infrastructure in Support of Housing.....	51
Planning Funding.....	52
Stormwater Infrastructure Funding.....	52
Section Six: Program Administration	53
Administrative Funds	53
Pre-Agreement Costs	53
Citizen Participation Plan	53
Publishing the Plan, Comments and Amendments.....	54
Performance Reports	54
Requirements for Local Governments Receiving CDBG Funds.....	54
Availability to the Public.....	55
Access to Records.....	56
Complaints.....	56
Measures for Language Access Plan– IowaCDBG Language Access Plan:	56
Resources Used to Inform Action Plan:.....	56
Appendix A –Implementation Plan and Capacity Assessment	57
Disaster Recovery Website DR-4421.....	61
List of Abbreviations.....	61
Appendix B – Iowa CDBG LEP Guidance	62
Appendix C – Certifications.....	65
Certifications Waiver and Alternative Requirements	65
Appendix D – Public Comment	68
Public Comment and Response.....	68
Appendix E – MID County Expansion Request and Response	74
Appendix F – Amendments.....	78

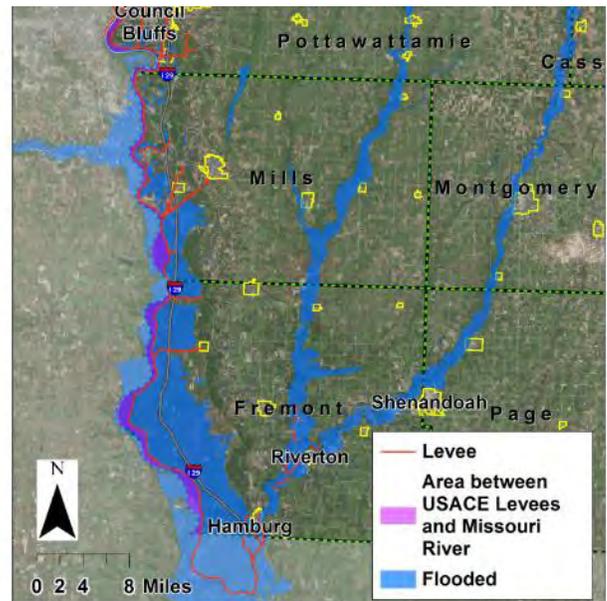
Executive Summary

Introduction

After an extremely cold and snowy winter of 2018-2019, a very strong storm system developed across Colorado on March 13, 2019; lifting northwest through the plains and Iowa the following two days. A period of warmer than normal temperatures, along with widespread rainfall, impacted much of Iowa as well as upstream basins of the Missouri River. Within two days, virtually all of the snowpack that existed across Iowa had melted and added to the widespread 1-3 inches of rain that fell across the entire state between March 12 and March 14. This series of weather patterns, and the still frozen soils, made condition in Iowa ripe for springtime flooding that began on March 13, 2019 and continued, primarily in southwest Iowa through the summer and into the fall.

The Missouri River U. S. Army Corps of Engineers levee system experienced at least nineteen levee breaches from Council Bluffs (Pottawattamie County) and south to the Missouri state line. The flood inundation levels were beyond any State or Federal capabilities to prepare for or prevent. Residents in the area east of the Missouri River to the Loess Hills were forced to evacuate due to rising and sustained floodwaters. Historic impacts to homes were witnessed in not only Fremont and Mills counties in the far southwest corner of the state, but all along the lengths of the Missouri River. It is estimated that many homes in the inundation area received as much as eight feet of water above the finished first floor, which did not recede for several weeks.

Due to the unprecedented nature of the levee system failure, along the Missouri River it is estimated that at least 400 homes in just two of the ten counties designated for individual assistance by the Federal Emergency Management Agency (FEMA) have received major damage or were completely destroyed. Damage to homes during this event reached catastrophic levels resulting in over 2,300 registrations and over \$13 million in grants approved under the FEMA Individual Assistance program. Of these registrations, 133 reached the FEMA Housing Assistance maximum grant cap, and as such could not fully recovered from the even with those resources.



Only a few weeks later, the Mississippi River on the state's eastern border was also swelling from increased snow melt, frozen soils unable to absorb recent rains, and increasing river flows. While the Mississippi River valley has a more robust flood protection mitigation system, and all temporary levees were installed in a timely manner according to river levels, however, on April 30, 2019 a breach of the temporary levee system, resulted in significant flooding in Downtown Davenport, IA. The State's third most populated city saw flood waters inundate the commercial downtown along the Mississippi River, and on May 2, 2019, the Mississippi River crested at 22.7 feet, the highest level ever recorded in that location.

As with all disasters, the assessment of damage, and response is conducted multiple times by different organizations and for different purposes. This document tries to reflect those counts as time progressed to show the need and impact resulting from the flooding. Beginning with the Presidential Declaration of Disaster 4421, through the assessment and support provided by the Federal Emergency Management Agency (FEMA) and other Federal and State partners, through the assessment of unmet needs and the programming of funds.

As a result of the documented damage, and the remaining unmet need, the Federal Department of Housing and Urban Development allocated \$96,741,000 to the State of Iowa in Community Development Block Grant – Disaster Recovery (CDBG-DR) funds. The Iowa CDBG-DR Program used data from many partners as the basis of unmet need calculations while attempting to verify it with current survey information. In the months after the storm, and as a result of the allocation of Supplemental Disaster CDBG funding, the Iowa CDBG-DR Program, in conjunction with its partner agencies, the Regional Planning Commissions and Community Action Agencies, assessed the remaining unmet need in the affected counties. Unmet need was discovered in the areas of housing, public infrastructure, and economic revitalization. The purpose of this Action Plan is to outline the use of these CDBG disaster funds in a manner that directly addresses the unmet needs. The focus initially is on housing, as required in the Federal Register. **This document will outline the impact of the disaster - focusing on the most impacted counties, document response efforts and remaining unmet needs, and will explain how CDBG-DR programs will be established and implemented to address those unmet needs.**

The CDBG Disaster Recovery Program will accept applications using an “open cycle” format allowing cities and counties to apply under any of the programs established. The expenditure of funds rate will be analyzed to ensure a timely use of funds. If the “open cycle” methodology is not producing applications and activities at a pace consistent with the planned expenditure rate, the State reserves the right to establish category deadlines with the intention of increasing the expenditure pace. Any change in access to applications for assistance will be announced publicly. Maximum application amounts, if applicable, and maximum beneficiary amounts, if applicable are spelled out in the Plan. At the point that the unmet housing need is exhausted, the CDBG-DR Program will formally amend the Plan to reflect the use of remaining funds in areas of unmet need in the categories of infrastructure and economic revitalization. This current Plan provides the unmet needs information for both of those categories and the amended Plan will provide an update as well as a method of distribution that reflects areas most impacted. The amendment will provide detail on categories of funding available, deadline dates, as applicable, and any maximums per applicant or beneficiary.

Key Numbers about this allocation

Total Allocation to the State of Iowa: \$96,741,000

80% of Allocation limited to MID Counties (Mills, Fremont & Harrison): \$77,392,800

70% of Allocation must benefit Low-to-Moderate Persons: \$64,197,327*

Programs must primarily consider and address unmet housing recovery needs first.

*calculated in accordance with 24CFR750.200(a)(3) where admin and planning are subtracted from the total so the aggregate of CDBG program funds are used to support activities benefitting low-and moderate income persons.

Proposed Program Budget Summary

Program	Funding by Program	%	Activity	Funding by Activity
Housing	\$90,468,676	93.52%		
			Buyout – FEMA Match (8.00%)	\$7,754,627
			Infrastructure in Support of Housing (46.63%)	\$42,184,092
			Construction of New Housing with Down Payment Assistance for Homeowner (34.00%)	\$30,759,822
			Construction of Rental Housing (10.80%)	\$9,770,135
Infrastructure	\$2,692,304	2.78%	CDBG-DR Stormwater Infrastructure	\$2,692,304
Planning	\$710,256	0.73%	Land use planning	\$710,256
Admin	\$2,869,764	2.97%	IEDA Staff, Recipient Grant Administration, and Professional Services Contracts to assist with grant administration.	\$2,869,764
	\$96,741,000	100%	Total Funds Allocated	\$96,741,000



March 28, 2019 – I-29 & US 34 Interchange, Iowa DOT

Section One – Disaster Introduction

Appropriations Act

During the months that followed the spring 2019 flooding and disaster declaration, the U. S. Congress passed H. R. 2157, the *Additional Supplemental Appropriations for Disaster Relief Act, 2019*, and on June 6, 2019, President Donald J. Trump signed the act into law. (Public Law 116-20). Versions of the act had been drafted in Congress in February of 2019, specifically to address 2018 Disaster events such as Hurricanes Michael and Florence, wildfires, typhoons and volcanic activity. When the Midwest floods and other spring 2019 disaster events occurred, those more recent events were added to the draft act, and ultimately incorporated into the law.

The Department of Housing and Urban Development (HUD) uses the “best available” data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure, and housing and economic revitalization. Based on this assessment, HUD notified the State of Iowa that it will receive an allocation of \$96,741,000 in disaster recovery funds to assist in recovery from the floods of 2019, as detailed in Federal Register Notice 85 FR 4681, Dated January 27, 2020.

Due to the fact that the Act, included both new disaster appropriations, and supplement to existing CDBG-DR awards for earlier disasters, the Federal Register notice that included Iowa’s allocation of \$96,741,000, referenced prior Federal Register Notices for federal requirements and program compliance. The additional applicable Federal Register Notices with guidance and requirements for this program include:

83 FR 5844, February 9, 2018

83 FR 40314, August 14, 2018

84 FR 4836, February 19, 2019

84 FR 28848, June 20, 2019

The Additional Supplemental Appropriations for Disaster Relief Act requires that the state or local government must expend the funds within six years of the signed agreement between HUD and the State (grantee) unless an extension is granted by HUD. To ensure that the funds assist the most impacted areas, at least 80 percent of the combined total awarded to the state will go to the most impacted and distressed (MID) counties. All the allocated funds must be used for eligible disaster-related activities. Effective controls must be in place and monitored for compliance to ensure that fraud, waste, and misuse of funds does not occur.

The Iowa Economic Development Authority (IEDA) has been designated by Governor Kim Reynolds as the responsible entity for administering the CDBG-DR funds allocated to the state. Iowa submits this Action Plan to outline its unmet needs and establish how the state will allocate its funds through its programs. This includes the proposed use of funds, criteria for eligibility, and how funds will address long-term recovery in the most impacted and distressed areas. The Unmet Needs Assessment, which evaluates the three core aspects of recovery – housing, infrastructure, and economic development-- forms the basis for the decisions outlined in the Method of Distribution. This Action Plan was developed with the help of many state and local stakeholders as well as the public to target the unmet need that can be addressed by these limited federal funds.

Summary of Impact and Presidentially Declared Counties

On March 21, 2019, Iowa Governor Kim Reynolds requested an expedited Presidential Major Disaster Declaration for 57 counties in Iowa impacted by flooding along the Missouri River and other parts of the state, which began on March 12, 2019 and was on-going at the time of the request. On March 23, 2019 President Donald J. Trump issued a Major Disaster Declaration (DR-4421). The flooding event continued, and the incident period remained open until June 15, 2019. By the end of the incident period, 80 of Iowa's 99 counties were included in the Presidential Disaster Declaration for some level of Public Assistance, and 10 counties: Fremont, Harrison, Louisa, Mills, Monona, Muscatine, Pottawattamie, Scott, Shelby and Woodbury were eligible for Individual Assistance.

While some impacted properties remained inaccessible for weeks after the start of the disaster event, joint federal, state, and local government Preliminary Damage Assessments (PDAs) were conducted in the requested counties and are summarized below. The following data was provided to the state by HUD in the Allocation Methodology meeting on January 8, 2020 and reflects the full extent of the declaration for Disaster 4421.

Individual Impacts

- Total Serious Housing Damage - 571
 - Total Serious Damage – 491
 - Total Serious Unmet Need - 407
 - Owner Serious Unmet Need - 325
 - Renter Serious Unmet Need - 82
- Total Individual Assistance Cost Estimate - \$23,140,238

Public Infrastructure Impacts

The Primary impact was damage to roads, bridges, and water systems

- Total Public Assistance cost estimate - \$275,316,594
- Total Local Share (Unmet Need) - \$68,829,148

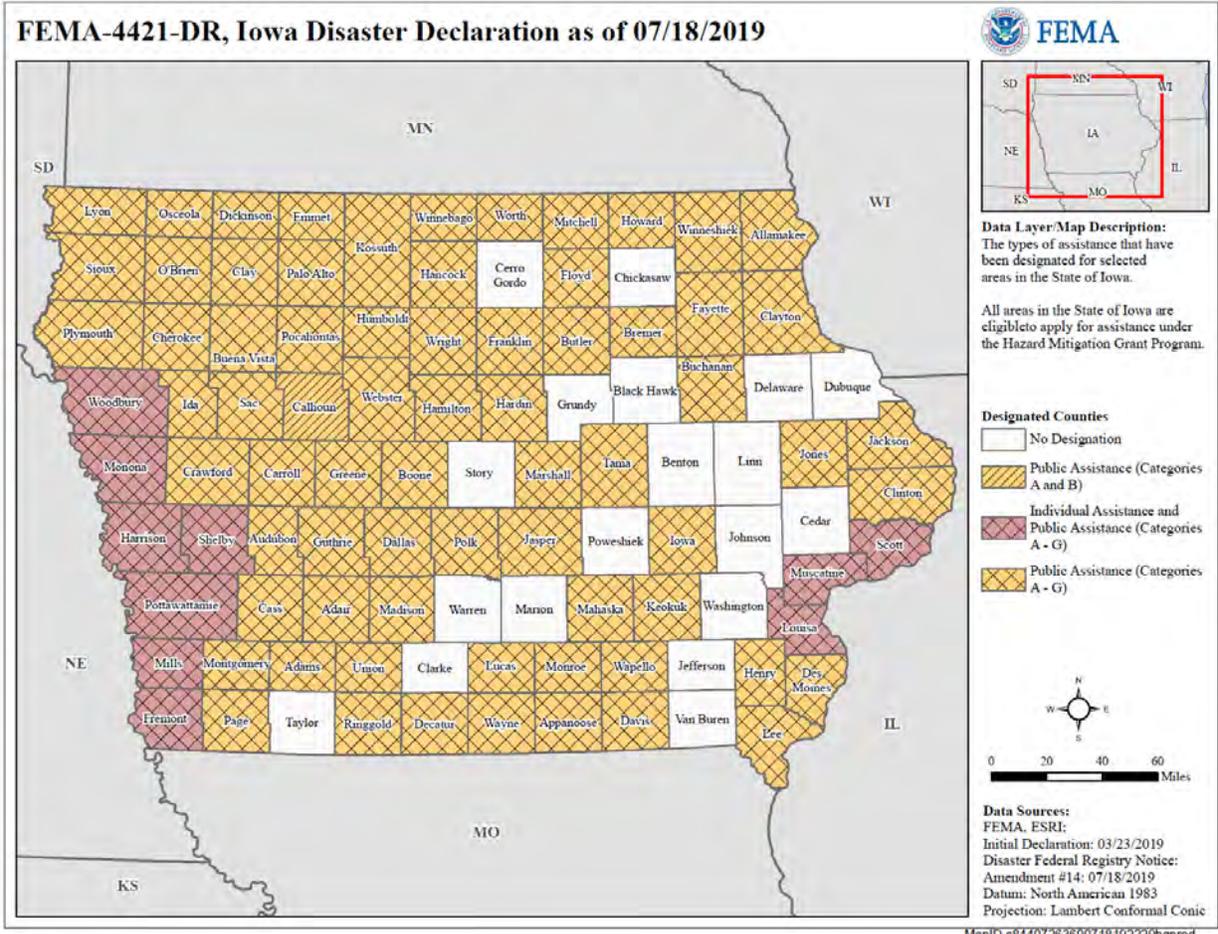
Business Impacts

- Estimated Serious Unmet Business Needs - \$4,771,913



March 28, 2019 Iowa 2, Pilot Travel Center, Iowa DOT

FEMA Eligibility Map



Counties Eligible for FEMA Assistance

County	Public Assistance	Individual Assistance
Adair	X	
Adams	X	
Allamakee	X	
Appanoose	X	
Audubon	X	
Benton		
Black Hawk		
Boone	X	
Bremer	X	
Buchanan	X	
Buena Vista	X	
Butler	X	
Calhoun	X	
Carroll	X	
Cass	X	
Cedar		
Cerro Gordo		
Cherokee	X	
Chickasaw		
Clarke		
Clay	X	
Clayton	X	
Clinton	X	
Crawford	X	
Dallas	X	
Davis	X	
Decatur	X	
Delaware		
Des Moines	X	
Dickinson	X	
Dubuque		
Emmet	X	
Fayette	X	
Floyd	X	
Franklin	X	
Fremont	X	X
Greene	X	
Grundy		
Guthrie	X	
Hamilton	X	
Hancock	X	
Hardin	X	
Harrison	X	X
Henry	X	
Howard	X	
Humboldt	X	
Ida	X	
Iowa	X	
Jackson	X	

County	Public Assistance	Individual Assistance
Jasper	X	
Jefferson		
Johnson		
Jones	X	
Keokuk	X	
Kossuth	X	
Lee	X	
Linn		
Louisa	X	X
Lucas	X	
Lyon	X	
Madison	X	
Mahaska	X	
Marion		
Marshall	X	
Mills	X	X
Mitchell	X	
Monona	X	X
Monroe	X	
Montgomery	X	
Muscatine	X	X
O'Brien	X	
Osceola	X	
Page	X	
Palo Alto	X	
Plymouth	X	
Pocahontas	X	
Polk	X	
Pottawattamie	X	X
Poweshiek		
Ringgold	X	
Sac	X	
Scott	X	X
Shelby	X	X
Sioux	X	
Story		
Tama	X	
Taylor		
Union	X	
Van Buren		
Wapello	X	
Warren		
Washington		
Wayne	X	
Webster	X	
Winnebago	X	
Winneshiek	X	
Woodbury	X	X
Worth	X	
Wright	X	

Section Two: Iowa Disaster Recovery

Iowa Disaster Recovery Framework

The State of Iowa exercises a robust Recovery Support Function (RSF) program, in accordance with Federal Department of Homeland Security, through Federal Emergency Management Agency (FEMA) models, engaging relevant state partners and resources in both exercising and responding to disaster events. Iowa has historically had a strong emergency response network with county emergency managers receiving training and technical support from the State.

Recovery is the process of returning a community to a normal state, albeit a “new normal”, after a disastrous incident. Recovery planning is paramount because no community is immune to a disaster. A well-organized and collaborative approach will allow a faster recovery that leaves impacted communities more resilient. Emergency response is undoubtedly best achieved under a command and control structure, but recovery is best achieved through building consensus. It requires local dialogue, input, collaboration and participation from all sectors of the community. Iowa provides an organizational structure for addressing both the pre- and post-disaster recovery concerns for all hazard types. It is patterned after the National Disaster Recovery Framework (NDRF) that “establishes a common platform and forum for how the whole community builds, sustains, and coordinates delivery of recovery capabilities. Resilient and sustainable recovery encompasses more than the restoration of a community’s physical structures to pre-disaster conditions.

Through effective coordination of partners and resources, we can ensure the continuity of services and support to meet the needs of affected community members who have experienced the hardships of financial, emotional, and/or physical impacts of devastating disasters.” Pre-disaster planning greatly improves a community’s ability to successfully recover from a disaster. By identifying available resources, roles, and responsibilities, state and local officials will have the knowledge to better leverage assistance and coordinate with RSF partners to maximize availability and use of those resources. A whole community approach requires state and local governments; volunteer, faith- and community-based organizations; other non-governmental organizations; the private sector; and the public to work together. This teamwork enables communities to develop collective, mutually supporting local capabilities to withstand the potential initial impacts of these incidents, respond quickly, and recover in a way that sustains or improves the community’s overall well-being.

The long-term recovery effort considers community and regional recovery for public and private sector partners. It uses existing resources of the state; local, professional, technical, and financial programs to facilitate faster and more resilient recovery. The structure allows creative uses of existing programs. It also uses partnerships to form and solve problems. Stakeholder input is critical at every level. The State of Iowa specifies emergency operations necessary to coordinate disaster relief efforts for rapid return to pre-emergency conditions. It defines the state and local government roles and procedures for implementing supplemental federal

disaster assistance available under PL 93-288, the Robert T. Stafford Disaster Relief Act of 1988, as amended by PL 100-707. Providing services to people with disabilities and others with access and functional needs is implicit to the success of any recovery effort.

The Spring 2019 flooding event response was coordinated in accordance with such models. The State Emergency Operations Center (SEOC) was stood up, along with a web-based EOC to allow for a single point of data-sharing from remote disaster affected areas, and resources from around the state mobilized in response. As the local county emergency managers issued evacuation notices based on weather and flood gauge information, the State was also mobilizing resources. The Iowa Commission on Volunteer Services in coordination with local emergency managers established volunteer reception centers in Hamburg, Iowa (Fremont County) and Glenwood, Iowa (Mills County). These reception centers became one-stop-shops for flood impacted victims to access necessary supplies and make contact with disaster case managers for available resources.



Glenwood – Volunteer Reception Center

Governor’s Flood Recovery Advisory Board

On April 15, 2019, Governor Kim Reynolds signed Executive Order #4 to establish the Flood Recovery Advisory Board to serve as a central point of coordination of state activities for the recovery and rebuilding efforts. The board was made up of both State agency leaders and community leaders from affected counties. The executive order further established six sub-committee working groups of the Flood Recovery Advisory Board:

- Finance
- Economic Development

- Agriculture
- Workforce and Housing
- Flood Management and Infrastructure
- Public Health

These working groups were staffed by State of Iowa employees and included members of the public and impacted citizens. The working groups met regularly and reported up to the Flood Recovery Advisory Board through their working group board representative.

Additionally, the State Legislature amended the existing Iowa Flood Mitigation Board to offer a disaster response, recovery, and mitigation grant program, dedicated to the ten FEMA declared Individual Assistance counties. Details on this program are included in Section Four.

Response Activities from Date of Incident

Shelters

Shelters were established in various communities throughout the state and were supported by the American Red Cross, the Salvation Army, and numerous local volunteers. During immediate response to the incident, there were a total of 10 shelters open and active from Sioux County south to Fremont County, and also in Kossuth County. The majority of individuals being housed in shelters were forced from their homes within Fremont and Mills counties.

Schools

This event severely impacted the educational systems in Fremont and Mills counties. Due to flood water inundation of water treatment and wastewater treatment facilities, the water systems in both Hamburg (Fremont) and Glenwood (Mills) were forced to end operations, leaving not only the community but the schools without water. Hamburg Community School District and Glenwood Community School District worked diligently to provide some normalcy to students at a time when many were forced to also address flooding at home. Resources such as water buffalos and bottled water were stationed at various school buildings for sanitary and feeding purposes. Once school had dismissed for the summer, there remained a concern that displaced residents will require additional access and transportation to area schools.

Transportation

Due to the magnitude of floodwaters, the Iowa Department of Transportation was forced to close a number of major transportation routes across the state. The interchange of two major interstates, I-29 and I-680 were closed south of Council Bluffs (Pottawattamie) to the Missouri state line. This route created detour of approximately 134 miles for travelers between Kansas City, Missouri, and Council Bluffs, Iowa. Locally, these closures upwards of 20 to 30 miles on average to daily commutes for 76 days from March 12 through May 10, 2019. These same interchanges were subsequently closed beginning on May 29 and remained closed for the summer and into the fall. Road closures not only cause an increased cost of living but have impacted survivors' ability to maintain employment across state lines, specifically into Nebraska.

Healthcare

Hospitals, clinics, and pharmacies throughout the declared area were inundated and forced to activate emergency operations plans. The primary care provider for the southwestern region of Iowa, George C. Grape Community Hospital, was provided water through the state emergency operation center and the Iowa National Guard until the city of Hamburg's public water supply DCM Justification Brief was back online on May 20, 2019. Other businesses, including pharmacies, continue efforts to reopen.

Housing

Evacuations occurred through the impacted area.

- All residents living west of I-29 and in the nearby unincorporated town of Bartlett (Fremont County)
- Southern half of the City of Hamburg (Fremont County)
- City of Thurman (Fremont County)
- City of Missouri Valley (Harrison County)
- All residents in the immediate vicinity of the southern portion of Levee 601 within Mills County
- City of Pacific Junction (Mills County)
- All residents west of the Loess Hills to the Missouri River in Mills County
- City of Kozsta (Iowa County)

Over 23,000 homes were assessed immediately following the event and nearly 1,200 were estimated to be majorly impacted. After the declaration was approved, an additional four counties were assessed to have between twenty and thirty majorly impacted homes, but by June 2019, floodwaters have not fully receded, leaving many homes inaccessible.

There is a severe lack of temporary and permanent housing options in the area along the Missouri River, which impacted residents' abilities to fully recover. Due to the shortage of housing, the State of Iowa requested and received approval for FEMA's Direct Housing Assistance for eligible residents in Fremont and Mills counties. Forty residents were identified for potential direct housing assistance.

As of June 17, 2019, the FEMA IA Daily Summary indicated:

- 2,239 registrations have been approved for Housing Assistance for over \$11 million
- An additional \$1.6 million has been approved for eligible Other Needs Assistance
- 250 registrants sustained over \$17,000 in FEMA Verified Loss (FVL)
- 380 residences sustained major damage or were destroyed
- 133 registrants received the maximum award of \$34,930
- 39 households are eligible for Direct Housing Assistance

In addition to housing assistance and repair, 994 individuals are or have received rental assistance. The evacuations sited above resulted in numerous residents having to find shelter at

campgrounds, with friends or family, or in area hotels. The City of Pacific Junction (Mills) was inaccessible and underwater for approximately three weeks, resulting in the displacement of all 470 residents. Because of this critical need, the state activated Emergency Support Function 6 on April 10, 2019, and the governor activated a Flood Recovery Advisory Board on April 24, 2019, to identify strategies and recovery resources throughout the state.

Long-Term Recovery Committees (LTRCs) were established throughout the affected area. Woodbury and Scott counties have permanent Community Organizations Active in Disasters (COADs) groups and were active immediately at the beginning of the incident. Four other counties (Fremont, Harrison, Mills, and Pottawattamie) activated LTRCs between April 16 and May 2. These organizations activated city and county organizations, civic groups, service organizations, public health representatives, and emergency management to address the needs of their citizens

The Iowa Department of Homeland Security and Emergency Management activated Emergency Support Function #6 for Mass Care, Emergency Assistance, Temporary Housing and Human Services on April 10, 2019. The group includes federal, state, local, and voluntary agency representatives and was organized to identify potential temporary housing solutions within the declared area. The Iowa Finance Authority, as the state lead, provided information on the lack of housing stock in and around the counties along the Missouri River. This, in addition to the increased flood risk due to the lack of permanent flood protection, has increased the vulnerability of repeat and severe flooding along the river corridor.

Through FEMA's Individual Assistance, seven Disaster Recovery Centers (DRCs) were opened throughout the declared counties. The centers in Fremont and Mills County were scheduled to be open for an extended time in order to address the large population affected and will transition to Community Recovery Centers to continue to support residents. Across the DRCs over 1,400 contacts have been made with residents and assistance has been provided.

Since March 25th, 2019 Community Action Agencies have been implementing disaster case management services in Harrison, Mills, Monona, Pottawattamie, Sioux, and Woodbury counties, as well as on March 15th, Shelby County, and on April 11th, Louisa and Scott counties.

The State of Iowa requested and received additional FEMA resources in the form of a Disaster Case Management award. These funds, awarded through FEMA, worked through the Iowa Department of Human Services to the FEMA declared individual assistance counties through a network of Community Action Agencies. The Disaster Case Management funds are used to provide training, supplies and materials to the State to ensure sufficient case managers are able to meet with disaster victims and identify unmet needs, connect them with existing services and ensure that they are receiving all necessary and available benefits. In coordination with State partners, including the Flood Recovery Advisory Board and the Long-term Housing Solutions Working Group, these Community Action Agencies have been able to provide assistance to flood impacted victims in the year since the disaster event.

Iowa Economic Development Authority's Role in Response

The IEDA staff were actively engaged in the State's response efforts from the very beginning. Prior to the establishment of the Governor's Flood Recovery Advisory Board, IEDA's Director and staff met with the Governor regarding response efforts. After the Flood Recovery Advisory Board was established, several IEDA staff participated in the working groups, meeting frequently with flood impacted victims and touring the damaged areas to assess strategies for recovery.

IEDA staff participated in the Long-Term Housing Recovery Work Group Meeting, before any CDBG-DR funding was considered to meet the unmet need. IEDA staff provided guidance and assistance in housing disaster response. Once the *Additional Supplemental Appropriations for Disaster Relief Act, 2019* became law, IEDA Community Development Staff further engaged with local residents and impacted municipalities to best inform this Action Plan. In addition to early community engagement from FEMA, IHSEMD and local municipalities regarding disaster response and recovery that saw public engagement and participation from a majority of impacted residents, the following is a summary of some of the public engagement that occurred prior to drafting this document:



June 4, 2019 Workforce & Housing Working Group

June 4, 2019: IEDA Staff and the Workforce and Housing Working Group tour the damaged area and meet with impacted citizens.

July 2, 2019: Workforce and Housing Working Group host a public meeting regarding safety measures for rebuilding.

September 25, 2019: Workforce and Housing Working Group meet in Mills County discuss results of IEDA's Housing survey and talk about potential CDBG-DR funding programs.

January 14, 2020: IEDA and HSEMD Discuss Flood Mitigation Board Funding

February 4, 2020: IEDA Community Development presents DRAFT Action Plan to the public in Mills County including builders, developer and financiers interested in supporting the development of new housing.

February 18, 2020: IEDA and HSEMD met with the City of Hamburg and later with Fremont County Board of Supervisors regarding Flood Mitigation Funds and CDBG-DR eligible Projects.

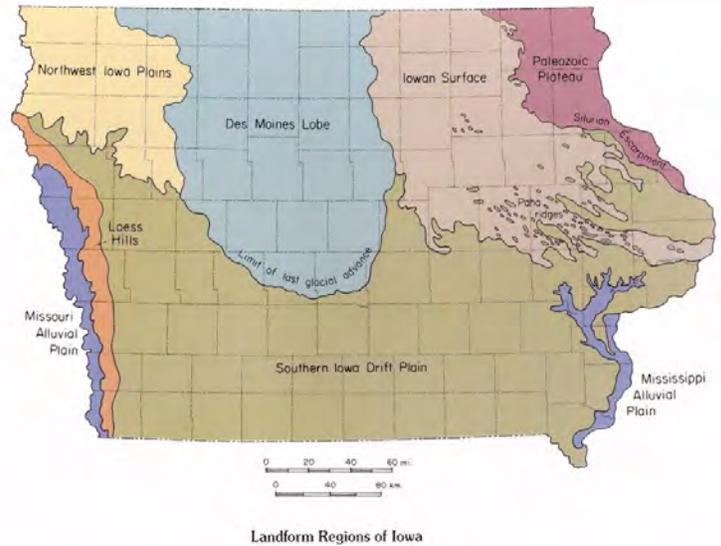
March 9, 2020: IEDA staff met with interested parties from Mills County to talk about Utility and Housing projects.

Section Three: Overall Storm Impact

Pre-Disaster Conditions

The 80 declared counties impacted by this disaster span the entire state of Iowa, with the initial and most severe impacts occurring primarily in the southwest Iowa counties along the Missouri River.

The unique geography of western Iowa features the Loess Hills. Situated between one and 15 miles east of the Missouri River, the large bluffs rise up to 200 feet above the flat plains of the Missouri River valley floodplain. During the last ice age, glaciers advanced to the middle of North America, grinding the underlying rock into dust like glacial flour. As temperatures warmed, the glaciers retreated, and vast amounts of meltwater and sediment flooded the Missouri River Valley. The sediment was deposited on the flood plain, creating huge mud flats. When meltwaters receded, these mud flats were exposed, and as prevailing winds impacted the mud flats, large dunes formed in the eastern extent of the river valley. Eventually these dunes were stabilized by grass and prairie plants, forming the unique landform and drainage patterns of the Loess Hills. This Missouri Alluvial Plain spans along the western border of the state of Iowa from the Missouri River to the Loess Hills and can stretch up to fifteen miles wide (west-to-east). This flat



Iowa Geological Survey



Existing Levee System

river valley allows for agricultural production and ease of transportation along the river, and as such a complex series of levee structures that have been built over the past two centuries to protect this Missouri Alluvial Plain. Rural communities continued to establish within the river valley, protected by man-made levees, however these communities, farms and developments remain subject to flooding events during years of heavy snowmelt, increased rain events, or high soil saturation, as was seen in the Spring 2019 events.

The Spring 2019 flooding event continued over a four-month period, during which rivers, tributaries, and streams in Iowa swelled, resulting in flooding damage to 80 of Iowa's 99 counties. However, the counties with the most severe damage were those counties declared for Individual

and Public Assistance by FEMA: Fremont, Harrison, Louisa, Mills, Monona, Muscatine, Pottawattamie, Scott, Shelby and Woodbury. All of those counties, except for Shelby County, experienced flooding in the Iowa Geological Survey mapped Alluvial Plains. First along the Missouri River to the west, and later during the incident period along the Mississippi River on the eastern border of the state. Furthermore, the residents most significantly impacted by the disaster event were residents of Mills and Fremont Counties.

People

The two southwestern most counties of Iowa, Mills and Fremont Counties were the most impacted counties during the 2019 event, and as such, determined by the Federal Department of Housing and Urban Development (HUD) to be the Most Impacted and Distressed and Urgent Need (MID URN) areas. On January 13, 2020, the State of Iowa submitted a request to HUD to expand the MID to include Missouri Valley, Iowa in Harrison County. Based on FEMA data of Verified Losses, Missouri Valley is the only municipality to have a significant number of FEMA Verified Loses (FVL) and a total FVL percentage per population over 3% outside of Mills and Fremont Counties. This request was approved by HUD on June 1, 2020.

Table II.65.8
Population by Race and Ethnicity
Mills County
2010 Census & 2017 Five-Year ACS

Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	14,639	97.2%	14,433	96.7%
Black	57	0.4%	118	0.8%
American Indian	49	0.3%	107	0.7%
Asian	55	0.4%	32	0.2%
Native Hawaiian/ Pacific Islander	10	0.1%	0	0%
Other	84	0.6%	83	0.6%
Two or More Races	165	1.1%	160	1.1%
Total	15,059	100.0%	14,933	100.0%
Non-Hispanic	14,700	97.6%	14,510	97.2%
Hispanic	359	2.4%	423	2.8%

Table II.36.8
Population by Race and Ethnicity
Fremont County
2010 Census & 2017 Five-Year ACS

Race	2010 Census		2017 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	7,212	96.9%	6,716	96.1%
Black	39	0.5%	50	0.7%
American Indian	23	0.3%	35	0.5%
Asian	20	0.3%	0	0%
Native Hawaiian/ Pacific Islander	1	0%	0	0%
Other	79	1.1%	101	1.4%
Two or More Races	67	0.9%	83	1.2%
Total	7,441	100.0%	6,985	100.0%
Non-Hispanic	7,254	97.5%	6,808	97.5%
Hispanic	187	2.5%	177	2.5%

Prior to this flooding event, these areas experienced some prior flooding, and population loss associated with past events, including events in 1993 and 2011. The State of Iowa is the 31st most populated State with an estimated 2018 population of 3,156,145. Out of Iowa's 99 counties, Mills County ranks 53rd with a population of 15,063, while Fremont County, Iowa's southwestern most county ranks 91st with a population of 6,993. Both counties are predominantly white, with minimal change in demographic population over the past decade.

Economic Conditions

Prior to the disaster event, Mills and Fremont counties had similarly positive economic conditions, with unemployment levels around 2.1% and 1.9% respectively, slightly lower than the State's 2.5% unemployment rates in the year prior to the disaster event.

Located close to the Omaha-Council Bluffs metropolitan area, with transportation and access to jobs in both Iowa and Nebraska, the economic conditions in these two counties were stable.

Prior to the disaster, Mills County had 30% of the households with income above \$100,000 and a poverty rate of 9.2% and Fremont County had 20% of households earning above \$100,000 a poverty rate of 11%.

Vulnerable Communities

As described above, the most impacted populations from the flooding were those areas of the counties that fall within the Alluvial Plain, or the floodplain of the Missouri River. One municipality in each county, along with some unincorporated areas of the counties were most significantly impacted during the disaster event: Pacific Junction in Mills County and Hamburg in Fremont County. The State used the county level to assess vulnerable populations, because unlike urban areas, where census data may pinpoint concentrations of vulnerability, these rural communities, with few tracts per county, are most reasonably assessed at the county or regional level to capture all conditions and needs.



In Pacific Junction, a town with a population of 470 people, the pre-disaster unemployment rate was 6%, much higher than the county or the state. The average earnings in Pacific Junction were \$32,438 with primary employment in manufacturing, construction, retail, and healthcare. The most recent American Community Survey indicated a Low- and Moderate-Income population of 62.9%, and a poverty rate of 14%.

Hamburg, a town in Fremont County with a population of 1,089, had a pre-disaster unemployment rate of 8.9% and average earnings of \$37,662 with jobs primarily in farming, manufacturing, construction, retail, and transportation. The most recent American Community Survey indicated a Low- and Moderate-Income population of 61.3% and a poverty rate of 13%.



With economic conditions such as these pre-disaster, the flooding event of 2019 caused even greater hardship on these vulnerable populations.

Furthermore, the state has researched these counties in relation to the vulnerable populations included in Federal Register Notice 83FR5844 and provides the following assessment for pre-disaster conditions:

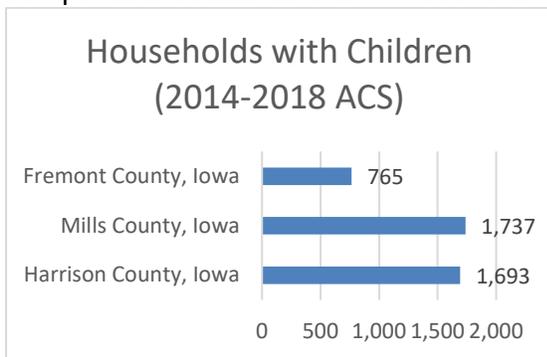
Racially and Ethnically Concentrated Areas of Poverty:

The state of Iowa has assessed areas that qualify for HUD’s definition of Racially and Ethnically Concentrated Areas of Poverty, known as R/ECAP, and through the State’s Analysis of Impediments (AI), documented that no such areas are present in the state outside of entitlement cities, see page 54 in the following link

<https://www.iowaeconomicdevelopment.com/UserDocs/documents/IEDA/2018-Iowa-AI-DPR.pdf>. As such, no R/ECAP are present in the MID counties where program funds will be expended.

Families with Children:

According to the ACS, 23.2% of Iowa’s population is under the age of 18. The State of Iowa has a total of 371,350 families with Children according to the 2014-2018 ACS. The State has compared that total to the MID Counties identified by HUD:

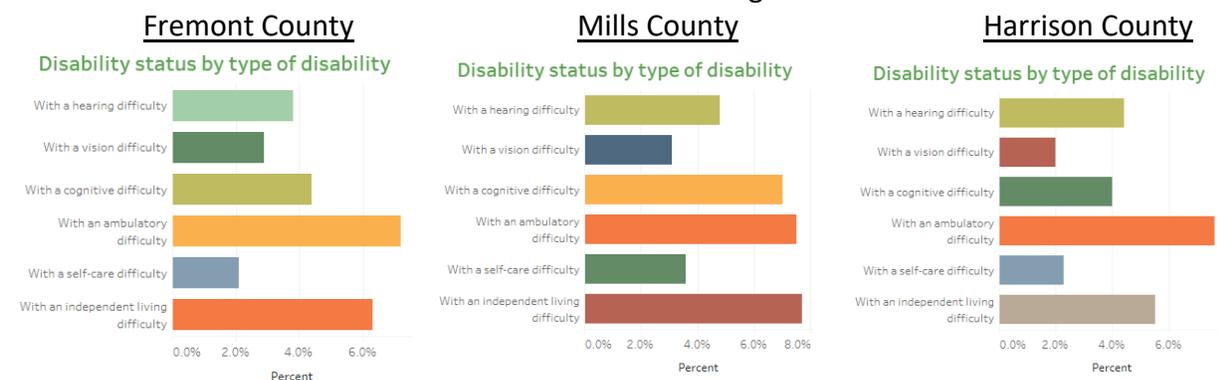


Persons with Disabilities:

According to the U.S. Census American Community Survey (ACS) 11.7% of the population of the State of Iowa is disabled, with 7.8% persons with disabilities under age 65. The MID counties included in this disaster demonstrate higher percentages than the state for that category:

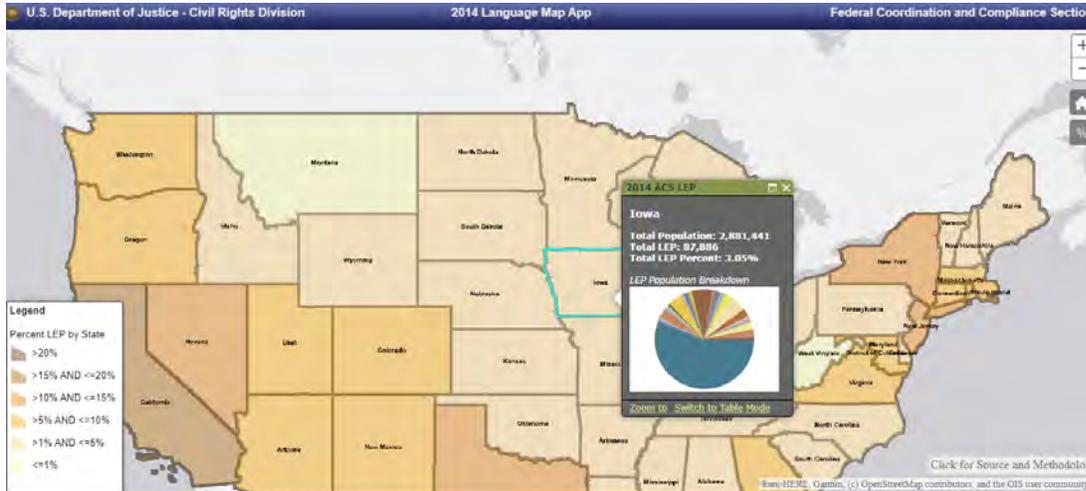
Health	Harrison County, Iowa	Fremont County, Iowa	Mills County, Iowa	Iowa
With a disability, under age 65 years, percent, 2014-2018	8.0%	9.6%	11.3%	7.8%

Those disabilities are further broken down in the following tables:



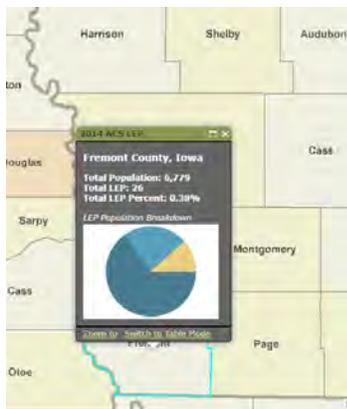
Limited English Proficiency (LEP):

In an assessment of persons with limited English Proficiency within the MID counties identified by HUD, the State presents the following data obtained from LEP.gov. Overall, the state of Iowa has an LEP population of 3.05%:

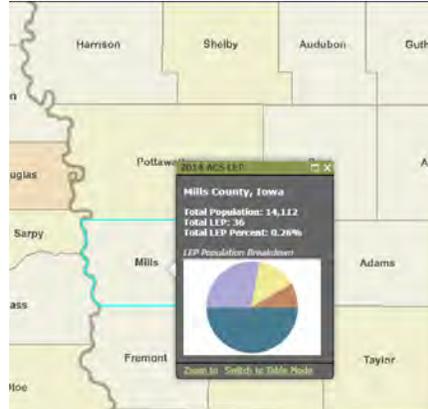


However, the represented MID counties have LEP Populations percentages less than half of 1%:

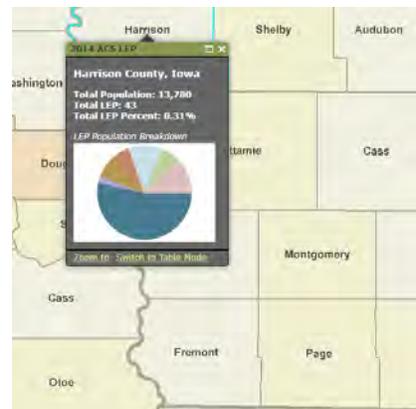
Fremont County
LEP Population 0.31%



Mill County
LEP Population 0.38%



Harrison County
LEP Population 0.26%



The State has conducted an assessment of this LEP data, which is included in Appendix B of this document, in the Iowa CDBG LEP Guidance.

Supportive Housing Needs:

The State has assessed the local needs for persons who are not homeless but require supportive housing. The state's Iowa Finance Authority (IFA) currently manages the ESG program for the State and coordinates needs for this vulnerable populations. In delivering ESG, IFA consults with the Iowa Council on Homelessness (ICH), which is currently the decision-making body for the Iowa Balance of State (BoS) Continuum of Care (CoC), to ensure alignment

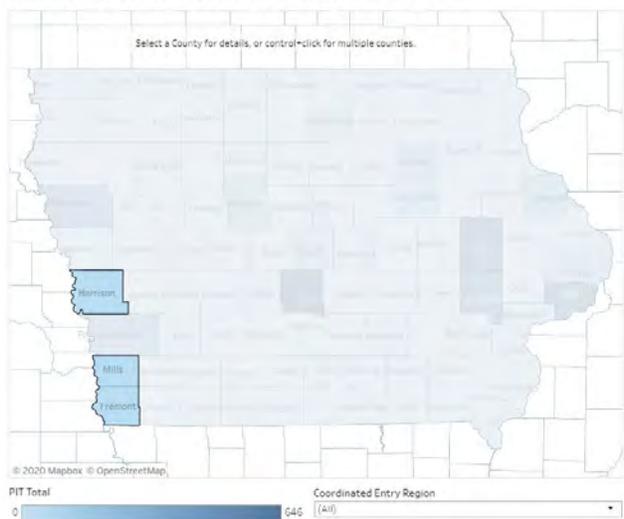
of program activities and consistency in program delivery. In delivering HOPWA, IFA consults with the five project sponsors in the state to ensure that needs across the state are being met and are being coordinated among the project sponsors. The project sponsors in the state are Primary Health Care in Des Moines, Iowa; Siouxland Community Health Center DBA Ruby Slippers Project in Sioux City, Iowa; Cedar Valley Hospice DBA Cedar AIDS Support System in Waterloo, Iowa; the University of Iowa in Iowa City, Iowa; and The Project of the Quad Cities in Moline, Illinois and Davenport, Iowa.

To ensure services are appropriately targeted with community needs, IFA staff assigned to homeless activities consult regularly with the BoS CoC, the ICH, and regional institutional entities. Likewise, IFA staff regularly consult with the five HOPWA service providers to ensure that services are being delivered to meet the needs of the HIV/AIDS population in the state. This includes coordinating the 120 delivery of services funded through HOPWA and ESG and other federal, state, local, and private funding sources. The BoS CoC establishes examples of best practices and provides technical assistance to underperforming organizations that provide services to homeless persons to ensure that programs are structured to best meet the needs of the community and the target population(s).

Through coordinating with the Iowa Council on Homelessness, BoS CoC, and the five HIV/AIDS service providers, IFA is able to coordinate the delivery of services for persons experiencing homelessness and for special needs populations. This collaborative effort also creates efficiencies in identifying the needs and committing CPD funding to leverage other federal, state, local, and private funding services to provide appropriate services for homeless and other special needs populations.

While data regarding this vulnerable population is generally centered in more urban areas, the State provides the following point-in-time data to assist in this analysis:

2020 Point in Time



Mills County	
Total for the year	21
(based on zip code of last permanent address)	
Point In Time Count for 2020:	
Total:	0
Sheltered	0
Unsheltered	0
Veterans	0
Sheltered Veterans	0
Unsheltered Veterans	0

Fremont County	
Total for the year	15
(based on zip code of last permanent address)	
Point In Time Count for 2020:	
Total:	0
Sheltered	0
Unsheltered	0
Veterans	0
Sheltered Veterans	0
Unsheltered Veterans	0

Harrison County	
Total for the year	24
(based on zip code of last permanent address)	
Point In Time Count for 2020:	
Total:	0
Sheltered	0
Unsheltered	0
Veterans	0
Sheltered Veterans	0
Unsheltered Veterans	0

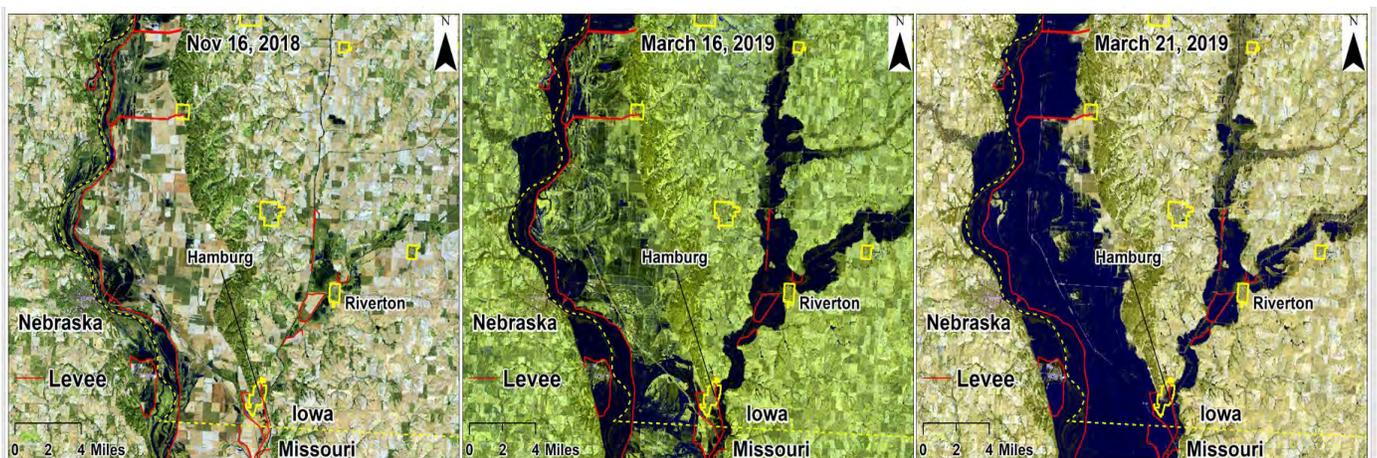
Storm Inundation

In mid-March 2019, heavy rain and above-freezing temperatures on top of deep snowpack in much of South Dakota, Nebraska and Iowa combined to create prime flooding conditions and ice jams along the Missouri River and its tributaries. The National Weather Service indicated that much of the Midwest soil was saturated even before the snowier-than-average winter after mild flooding in the fall of 2018. By March 17th, the power at Hamburg's water treatment plant was shut off just hours before floodwaters inundated the building. Residents of Mills and Fremont counties along the Missouri River were evacuated as necessary, including Pacific Junction, which after multiple levee breaches became inundated with up to 8 feet of water within hours.

On March 19th, Vice President Mike Pence and Governor Kim Reynolds surveyed damage in western Iowa and eastern Nebraska, and just a few days later on March 21st, floodwaters inundated the water treatment facility servicing Pacific Junction and Glenwood, the county seat of Mills County. As early as March 30th, some Hamburg residents were able to access homes and assess damage, however several properties remained inaccessible due to standing flood waters.

While flood waters were somewhat receding along the Missouri River, on April 30th a temporary flood wall failed along the Mississippi River on the eastern border of Iowa in the City of Davenport, sending a rush of flood waters into Davenport's commercial downtown, creating widespread flooding in Iowa's third most populated city.

Flood assessment and clean-up efforts continued throughout the spring, however, heavy rains in June, re-flooded the Missouri River valley, leaving many houses submerged for a second or even third time that spring.



2019 Spring Flood Inundation, Iowa Flood Center

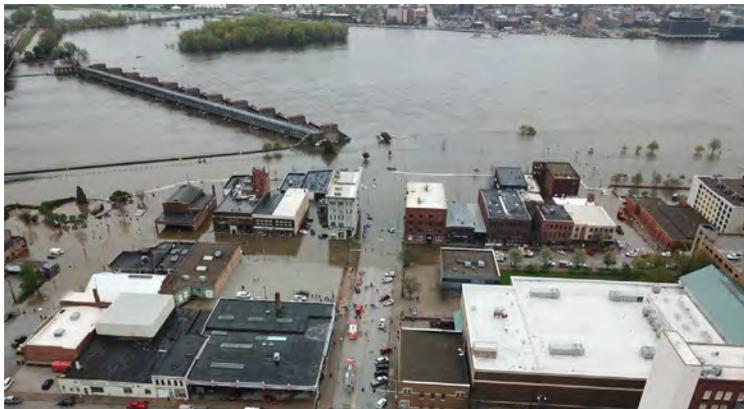
Section Four: Impact and Unmet Needs Assessment

General Impact

The spring 2019 floods caused significant damage to housing, agricultural production, private and publicly held infrastructure, public utilities, and businesses. While the western flooding spanned somewhat low-density population areas, the significant impact to the agricultural lands and storage facilities in the area was notable. Due to the close proximity to the river and transportation, many agricultural storage silos were located in the inundation area. Flooding caused silo collapses and the complete loss of stored products. Some silos were upended and carried significantly downstream. Homes were inundated for weeks, causing hundreds to be documented as destroyed, major roads closed for extended periods, agriculture missing the entire growing season and businesses closed indefinitely.



April 4, 2019, I-29 Between US 34 and Hamburg, Iowa DOT



April 20, 2019, Davenport Breach, National Weather Service

Eastern Iowa flooding saw inundation of a downtown commercial corridor, impacting restaurants, retail, recreation, infrastructure and multi-family housing. The failure of a temporary flood protection HESCO barrier caused flood waters to expand into downtown Davenport. Several other breaches in storm protection cause isolated damages to homes, infrastructure and business along the Mississippi River.

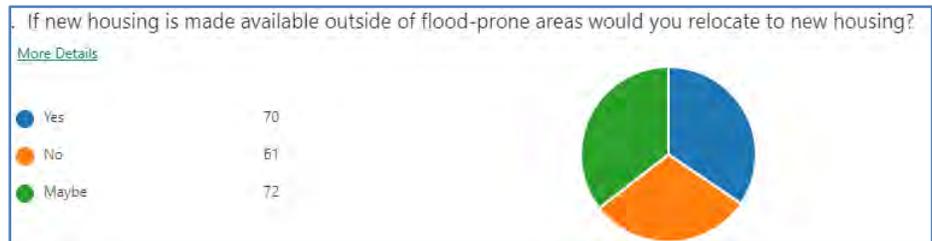
The Governor's Flood Recovery Advisory Board assessed the impact through sub-committee working groups. The two groups that most relate to the identification of unmet needs for the CDBG-DR program were the Workforce & Housing and the Economic Development working groups. Both groups met regularly and established methods of reaching out to flood impacted persons and organizations to gather data regarding unmet recovery needs. Infrastructure needs were considered by the Flood Management and Infrastructure working group. While FEMA identified a significant infrastructure need (over \$275 million), much of the infrastructure work is contingent upon flood control systems, such as Levees and Floodwalls, typically items not funded with CDBG-DR.

Housing

In July 2019, the IEDA, in coordination with the Governor’s Flood Recovery Advisory Board Workforce and Housing working group, published an online survey of flood impacted citizens to gauge their most significant remaining needs. The survey was anonymous, with 211 total responses. While most respondents answered all questions, some skipped questions, therefore the percentages provided in this assessment are based on the total who answered each individual question, not the total survey participants. While FEMA programs were continuing to deploy, and not all benefits had been expended to flood victims, and the State was able to get a good sense of the current unmet needs. A need that resonated throughout the survey was housing. 68% of all respondents indicated that they could not reside in their own home after the disaster event. While 73% indicated that they had received or qualified for some form of assistance including assistance from FEMA, SBA, and Flood Insurance, only 8% indicated that the assistance met their needs.

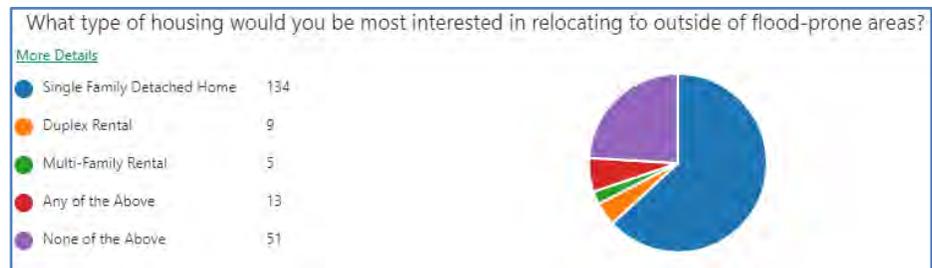
With the unique circumstance of this disaster and inundation area was limited to the geography of the Alluvial Plains, with continued

flood risks, the State asked about impacted victims’ interest in relocating outside of flood-prone areas. The responses were split in almost exact thirds, with 34% willing to relocate, 30% unwilling and the balance undecided.



The State asked if respondents rented or owned their home prior to the disaster event, 82% of respondents indicated they owned their home, with 18% identifying as renters. When asked about the type of housing that most appealed to flood impacted victims, an overwhelming majority, 63%, indicated a desire to relocate to a single family detached home outside of the flood prone areas,

followed by, “any,” duplex and rental in that order. While 24% of the respondents indicated that they would not relocate to new housing outside of the flood prone area. This leaves 76% of all respondents interested in new housing units, however, a lack of available housing makes meeting these needs impossible with the current housing stock.



During the spring 2019 flooding event, 100% of the residential structures in Pacific Junction, portions of Hamburg and surrounding unincorporated Mills and Fremont Counties, were inundated with water, some as high as eight-to-nine feet above first floor level and some for as long as eight weeks. This massive inundation resulted in the eligibility for FEMA’s Hazard

Mitigation Grant Program (HMGP) for buyouts and the preservation of cleared land in perpetuity as open green space to reduce future flood loss and improve stormwater management. At the time of this report, 128 out of approximately 198 residential housing units in Pacific Junction are pending an HMGP buyout. Similar conditions exist in Hamburg, where 74 properties are pending a buyout. Between Mills and Fremont Counties alone, close to 300 properties are proposed for buyout. The occupants of these houses pending buyouts have been displaced from their homes for over a year and will never move back to their flood affected properties. Many of these residents are in temporary housing, unable to afford a permanent solution until they are compensated for the sale of their home. As such, the State has prioritized the voluntary buyout of impacted residents as the greatest unmet housing need. The monetary proceeds of a buyout will be the first step forward for most of the flood impacted residents.

The State of Iowa's HMGP program (funded with federal FEMA funds managed by the State) currently has requests from municipalities seeking voluntary buyout for 300 properties totaling \$74,083,159; however, the State only has \$35 million available for this program. So even though the program can award as much as 75% per buyout application, there are not enough funds to fully fund all HMGP applications to the 75% federal share, leaving an unmet need for both the State and Local share and the Federal Share for remaining unfunded applicants.

As buyouts remain a voluntary process until closing, it is challenging to fully estimate amounts, but as of the writing of this Plan, 278 properties in the MID counties are being considered for buyout, of which 64 properties were tenant occupied prior to the disaster.

Additionally, at least one larger 22-unit multi-family rental facility in Hamburg, IA was damaged beyond repair, creating an unmet rental housing need in the region.

Post-Disaster Survey Comments:

Housing. I don't have an income that allows for me to replace everything and start over.

Waiting for a place to live.

Rent has gone up by 500 a month since being displaced. We had to furnish an entire house along with all the other items that belong in a house. We needed to purchase clothing for four people, so now money is extremely tight!! So in a nut shell money for day to day living.

The money I received from FEMA was one third or less of what it would cost to rebuild. I appealed it but lost the appeal . It's a fight to get rental assistance all the paperwork and documentation they keep adding.

Need more rental assistance no one can afford to pay the mortgage on the home that was in the disaster and rent another place also some fema money was used to rebuild and then second flood came and ruined al that was fixed

Need more money to pay rent and mortgage and rebuild

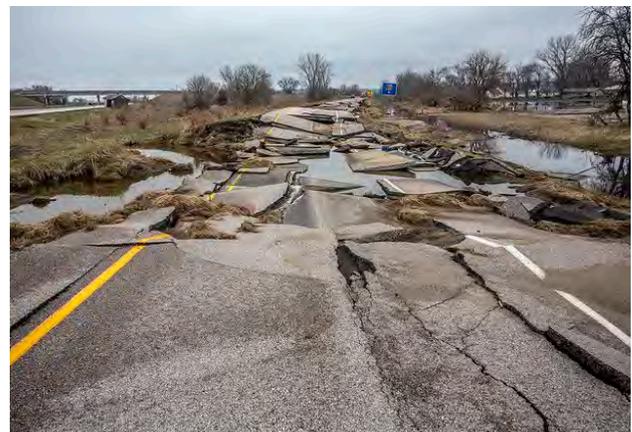
Not direct impact from Mississippi River flooding. Tremendous street flooding due to inadequate storm sewers

The second highest unmet need from the spring 2019 flooding is the production of new housing units. The pre-disaster vacancy rate for housing was only 2.6% for all of Mills County, and only two new building permits were issued for the entire county in 2018. Fremont County had slightly higher vacancy at 16.5% and only 8 new building permits in 2018. With this lack of available housing, the inundation of close to 300 households seeking new housing has further increased the costs of existing housing, leaving little to no affordable housing available. Creating new housing with CDBG-DR funding is necessary to not only replace housing lost as a result of the disaster, but to increase the availability of affordable housing throughout the impacted counties.

Although a significant number of houses were inundated during the disaster, a majority of the most damaged properties will be participating in a buyout program, and the remaining significantly damaged properties continue to be at risk of future flooding. The IEDA has determined that while a need for housing rehabilitation or reconstruction may exist, the ability to elevate properties nine feet high (in freezing climates and utility challenges), enforce flood insurance requirements, and additional costs for compliance, rehab is likely unfeasible. The private market has resulted in some repair and rehabilitation of flood affected properties without federal regulations.

Infrastructure

In HUD's assessment of FEMA eligible Public Assistance Categories C-G for permanent repairs to public infrastructure such as roads, bridges, water systems, municipal buildings and content, public utilities and recreation areas, the spring 2019 floods resulted in projects estimated at \$275,316,594. As the FEMA Public Assistance program provides funding for 75% of estimated costs, there is a remaining unmet need of \$68,829,148, representing the 25% required to be funded by State and local resources. Many of the public infrastructure repair projects are contingent upon the expansion and hardening of flood control systems, such as levees and flood walls. With the historic number of levee breaches in the spring of 2019, much of the public infrastructure was damaged and estimated for repair and will remain at risk until further investment is made in hardening flood management. As there are opportunities for recovery outside of the flood risk area, some public infrastructure may be abandoned as a result of the high number of residential properties seeking buyouts. As such, it is very difficult to assume the public infrastructure need based solely on FEMA's damage assessments. Comprehensive land use planning will be required to determine if infrastructure repair projects will be eligible for CDBG-DR funding.



April 4, 2019, Off Ramp from I-29 south of US 34

In addition to the local match needs for FEMA Public Assistance infrastructure, the State has determined, through the assessment of housing needs above, that in order to re-house flood impacted victims outside of flood risk or flood prone areas, significant investment in infrastructure in support of new housing, including new streets, stormwater management, utilities, sidewalks, etc. required for the establishment of new housing communities, is necessary.

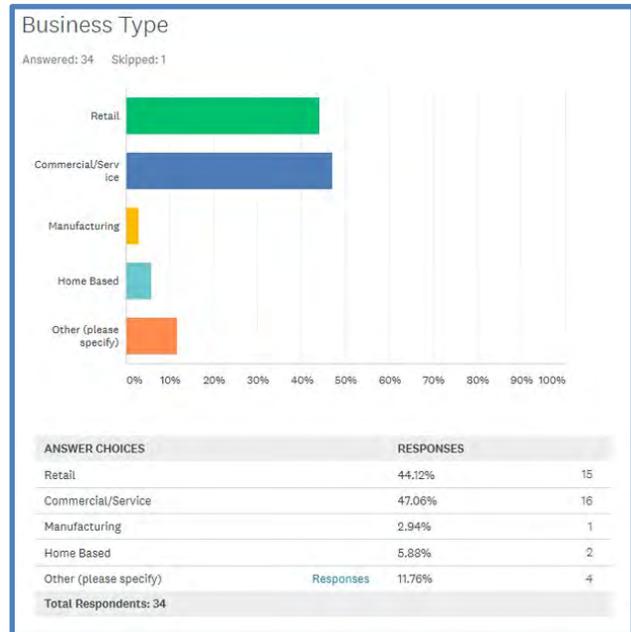
Lastly, the State has determined a need to harden or expand flood control systems in order to further protect those citizens who choose to remain in the current flood risk areas. This could include the installation of public infrastructure for enhanced stormwater management such as creating or expanding wetlands, elevating, and improving pump stations or public utilities to be more resilient to flooding events.

Economic Revitalization

The spring 2019 flooding caused the prolonged closure of Interstate-29, which runs north-to-south along the western edge of the state of Iowa. I-29 is the main route from Sioux City, IA to Kansas City, MO, with significant commerce and trucking transit. These interstate closures required transportation to be diverted through Des Moines, IA, adding one hundred miles to the route. Furthermore, the impacted areas of Mills and Fremont Counties along I-29 feature several transportation and commerce stops, such as gas stations, convenient stores, truck and trailer sales, repair shops, etc., all of which were inundated by flooding for extended periods.

In a joint report between FEMA and Iowa Homeland Security and Emergency Management dated July 16, 2019, the Small Business Administration reported that 463 businesses had been referred by FEMA as being impacted by the disaster. Only 109 had applied to SBA, and of that amount only 26 loan awards had been made, for a total of \$2,847,200. HUD further analyzed FEMA's data regarding business and economic needs and assumed that at least 40 businesses qualified for a serious unmet economic need, for an estimated financial need of \$4,771,913.

The Governor’s Flood Recovery Advisory Board, working group on Economic Development, surveyed impacted businesses in August 2019 to help determine a state level unmet need. The survey received 35 responses. Of which, 93% of the respondents owned their property, 63% of the businesses are located in the 100-year flood plain; however, only 27% carried flood insurance. 75% of the surveyed business have not relocated and are not planning to relocate as a result of the disaster. The total estimated damage calculated from the survey, including payroll, personal property, clean-up and repair costs, and damage/loss equals \$29,170,036.



State Flood Mitigation Board

In 2012, the State of Iowa Legislature established the Iowa Flood Mitigation Board (Iowa Code, Chapter 418). The purpose of this board is to create and oversee a flood mitigation program for the State of Iowa. The board is made up of four members of the public, six subject matter experts from state agencies, as well as four ex-officio members from the General Assembly. Prior to the 2019 floods, the Iowa Flood Mitigation Board received, approved, and oversaw applications from local governments for mitigation projects funded through a Sales Tax Increment program.

Iowa Homeland Security and Emergency Management – Iowa Flood Mitigation Board

On May 8, 2019, Governor Reynolds signed an amendment to the code creating a grant program for flood response, recovery, and mitigation, and appropriated an initial \$15 million of State funds. These funds are limited to the ten FEMA declared Individual Assistance Counties in response to the 2019 flooding event. The Board met in September of 2019 and reviewed the initial applications for these funds. The initial request of funds was \$23,620,375.80, and the Board was only able to award the appropriated \$15 million.

Even after the initial award of funds, the State continued to receive applications for funding. On February 13, 2020, the State Legislature passed SF 2144 which appropriated an additional \$21,003,186 to further meet the remaining unmet need. The Iowa Flood Mitigation Board was able to fund a total of \$36,003,186, primarily on projects where no other funding program was currently available. However, in the Flood Mitigation Board applications alone, over \$56 million in requests remained unfilled. These funds primarily assisted infrastructure, levee repairs, and land acquisition for redevelopment. And over \$30 million was requested for new housing needs. However, the Iowa Flood Mitigation Board did not award those projects due to insufficient funding to meet the need.

Reference Number*	Recipient	Project Title	Funding Agreement Executed	Awarded
2	City of Hamburg	Hamburg 2019 Demolition, Land Acquisition, Housing Incentive	10/21/2019	\$ 940,857
3	City of Fredonia	Fredonia 2019 Flood Mitigation Project	10/21/2019	\$ 135,550
4	City of Hornick	Hornick 2019 Flood Mitigation Project	11/4/2019	\$ 2,071,708
5	City of Hamburg	Hamburg Ditch 6 Levee Elevation	10/21/2019	\$ 6,356,324
6	Mills (County)	Mills Co 2019 Acquisition/Demolition Local Match	11/4/2019	\$ 2,341,923
7	City of Pacific Junction	Pacific Junction 2019 Acquisition/Demolition Local Match	11/4/2019	\$ 3,153,638
8	City of Buffalo	Buffalo Elm Street Basin	3/2/2020	\$ 211,021
9	City of Council Bluffs	Property Acquisition	Pending Signature	\$ 342,540
10	Fenster Drainage District	Levee Improvements	3/2/2020	\$ 76,849
11	Fremont (County)	Fremont County Property Acquisition	3/2/2020	\$ 15,954
12	Fremont (County)	Recovery Match - Debris and Asphalt	3/2/2020	\$ 38,025
13	Scott County EMA	Medical Center Utility Water Well	3/2/2020	\$ 417,375
14	City of Hamburg	Hamburg Levee Drainage Pumps and Demo	Pending Signature	\$ 1,100,000
15	Coulthard Levee District	Levee Improvements	3/2/2020	\$ 4,427,965
16	L-584 - Pleasant Valley Levee District	Levee Improvements	3/2/2020	\$ 862,000
17	Wabonsie Levee	Levee Improvements	3/2/2020	\$ 809,915
18	L-601 Missouri River LB - Bartlett Segment	Levee Improvements	3/2/2020	\$ 804,350
19	L-601 Missouri River LB - Miller Sturgeon	Levee Improvements	3/2/2020	\$ 852,850
20	M & P Missouri River Levee District	Levee Improvements - Planning	3/2/2020	\$ 279,149
21	M & P Missouri River Levee District	Levee Improvements	3/2/2020	\$ 1,709,474
22	Mills-Fremont Drainage District	Levee Improvements	3/2/2020	\$ 1,465,000
23	Lorimor Drainage District	Levee Improvements	3/2/2020	\$ 733,300
24	Pony Creek Drainage District	Levee Improvements	3/2/2020	\$ 1,152,300
25	New St. Mary's Drainage District	Levee Improvements	3/2/2020	\$ 685,500
26	Plattville Drainage District	Levee Improvements	3/2/2020	\$ 425,700
27	Honey Creek Drainage District #6	Levee Improvements	3/2/2020	\$ 651,519
28	Nobles Lake Drainage District	Levee Improvements	3/2/2020	\$ 51,090
29	Pigeon Creek Drainage District #2	Levee Improvements	3/2/2020	\$ 206,100
30	Pigeon Creek Drainage District #8	Levee Improvements	3/2/2020	\$ 8,400
31	Sac Drainage District	Levee Improvements	3/2/2020	\$ 42,404
32	Vanman Levee District	Levee Improvements	3/2/2020	\$ 3,369,107
33	Watkins Drainage District	Levee Improvements	3/2/2020	\$ 465,500
				\$ 36,003,186

* Awards numbered 2 - 7 are supported by the appropriation authorized on May 8, 2019 by Senate File 638.
Awards numbered 8 - 33 are supported by the supplemental appropriation authorized on February 13, 2020 by Senate File 2144.

Section Five: Method of Distribution & Connection to Unmet Need

Method of Distribution

When accessing disaster funds, Iowa will use a Method of Distribution that allows eligible cities and counties to apply for funds from the CDBG-DR Program under a series of Program Categories which are laid out over application rounds with deadline dates, per Category, or an open-cycle (first-come/highest) process (see Program Summaries below).

Federal Priority Funding – HUD has provided, by rule, that all funds shall first serve unmet needs in housing with 80% of the funds prioritized in three counties, Mills, Fremont, and Harrison and the remaining 20% of the funds to the Counties with a presidential declaration under DR-4421 (see map, page 10). Federal Priority Funding – Housing: HUD has also provided, by rule, that the unmet needs in the housing sector be addressed prior to entertaining any application for funds under the categories of Economic Revitalization or Infrastructure, unless it is infrastructure specifically tied to addressing an unmet housing need.

State CDBG-DR Priority Funding - The State CDBG-DR Program will prioritize funding based upon an equitable evaluation within each program. In addition to the Federal Priorities noted above, the State will prioritize most impacted communities outside of the MID counties above, along with projects focused on green building standards, green infrastructure, and flood resiliency.

Program Categories - Categories indicate the use of funds for a specific purpose. This Action Plan defines the categories of funds under Housing (see Program Summary Budget and Housing Program Detail), Infrastructure and Planning. The categories define the specific purpose, the total funds allocated to the category, the application method for accessing funds, deadline dates for applications within the Category, the maximum amounts available per applicant and the maximums per beneficiary.

Program Year - The year beginning at the point in which the agreements are executed between HUD and the State of Iowa. The program regulations provided that CDBG-DR funds are to be expended in six years.

Application and Guidelines - Each program Category will have an accompanying application form and guidelines cities and counties may use to submit their requests to the State CDBG-DR Program. All applications will be processed through the State's online grants management tool iowagrants.gov. Details are included in the Policies and Procedures Document. Once an application has been submitted through iowagrants.gov applicants can log-on and check the status of their application or submitted grant forms any time during the process.

Disaster Website – CDBG-DR will maintain a 2019 Disaster page within the agency's website at www.iowaeda.com which will contain a copy of the Action Plan, Action Plan amendments, application status reporting for grantee and beneficiaries, procurement information including

contracts for outside services, a contractor complaint hotline and general contact information, and more. A complete list of website content is available in APPENDIX A in this action plan document.

Policies and Procedures

A manual outlining the Policies and Procedures associated with the use of 2019 CDBG-DR Funding will be available to all interested parties and included in the dedicated website. In addition to the federal compliance areas of procurement, citizen participation, financial management, risk analysis process and tools, labor standards, equal opportunity and fair housing, environmental review and contract management, the manual will include housing quality standards and construction standards related to housing new construction, duplication of benefits requirements and processes, deed restrictions and applicable Uniform Relocation Act requirements, Optional Relocation Plans, resolutions related to flood insurance requirements, program agreements and contract documents, beneficiary intake forms, etc. None of the proposed programs are anticipated to produce program income, however all policies associated with the receipt and expenditure of program income are included in the Policies and Procedures Manual and the *Financial Management and Grant Compliance Certification for States and Grantees*.

Training and Technical Assistance

The complexity associated with using CDBG-DR funds requires training and technical assistance to ensure that project goals are achieved while remaining compliant with program rules and regulations. The CDBG-DR Program will offer training opportunities to interested parties at the application stage and the new grantee training stage. Training to build capacity will be implemented throughout the year by focusing on specific program compliance areas. Technical assistance is available to every potential application, sub-applicant, and professional service provider throughout each stage of the process. The Iowa CDBG-DR and CDBG Program trains regional Councils of Government (COG)s assigned to specific areas of the state, as well as specialists and consultants, who maintain expertise in certain fields such as housing, economic development, and infrastructure and compliance areas such as procurement, equal opportunity and fair housing, Uniform Relocation Act, labor standards, financial management, and environmental review. These experts act as Grant Administrators for all CDBG and CDBG-DR projects. All municipalities will work with a qualified Grant Administrator who has participated in IEDA sponsored trainings.

Cross-Cutting Regulations

The IEDA will ensure the compliance with all cross-cutting regulations for projects funded under this CDBG-DR Program. All contracts with recipients will reiterate the compliance requirements as applicable for the program type. Below is a summary of cross-cutting regulations and IEDA's efforts to document compliance. Further details will be provided in the CDBG-DR 2019 Policies and Procedures document.

Section 3

Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 75) requires that recipients of CDBG-DR funds, to the greatest extent feasible, provide job training, employment, and contract opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods. Section 3 applies to activities involving housing (construction, demolition, rehabilitation), other public construction — i.e. roads, sewers, community centers, etc, and other economic opportunities. The regulations seek to ensure that low- and very low-income persons, and the businesses that employ these individuals, are notified about the expenditure of HUD funds in their community and encourages them to seek opportunities (if they are created). Furthermore, Section 3 applicability depends on the size of the contract. As per 24 CFR Part 75, Section 3 requirements apply to program assistance for a Section 3 covered project(s) for which the amount of the assistance exceeds \$200,000. Section 3 requirements also apply to contractors and subcontractors performing work on Section 3 covered project(s) for which the amount of the assistance exceeds \$200,000.

There is an extensive section starting on page 43 of the CDBG-DR Policy and Procedure Manual regarding IEDA's implementation of Section 3 into the Disaster Recovery program. Compliance with Section 3 is verified at closeout with recipient upload reports in our grant's management software IowaGrants. Compliance with the requirements are verified up front as well as during monitoring of projects. Annually, IEDA holds a Section 3 training for recipients and grant administrators.

Davis-Bacon and Related Acts:

The Davis-Bacon and Related Acts, as amended, require that each CDBG-DR funded contract over \$2,000 for the construction, alteration, or repair of public buildings or public works shall contain a clause setting forth the minimum wages to be paid to various classes of laborers and mechanics employed under the contract. Davis-Bacon is applicable to demolition work only when the demolition activity is part of a construction project that requires Davis-Bacon. Demolition for purposes of blight removal only and that is not part of "...construction, alteration or repairs..." does not trigger Davis-Bacon Act requirements. The term "construction work" applies to both labor and/or materials. If CDBG-DR funds are only used to pay for the cost of materials for a Davis-Bacon covered project, Davis-Bacon requirements would still apply. Under the provisions of the Act, contractors or their subcontractors are to pay workers employed directly upon the site of the work no less than the locally prevailing wages and fringe benefits paid on projects of a similar character. The Davis-Bacon Act directs the Secretary of Labor to determine such local prevailing wage rates. In addition to the Davis-Bacon Act itself, Congress has added prevailing wage provisions to approximately 60 statutes, which assist construction projects through grants, loans, loan guarantees, and insurance. These "Related Acts" involve construction in such areas as transportation, housing, air and water pollution reduction, and health. If a construction project is funded or assisted under more than one Federal statute, the Davis-Bacon prevailing wage provisions may apply to the project if any of the applicable statutes require payment of Davis-Bacon wage rates.

IEDA has a designated staff person that assists recipients in understanding the Davis-Bacon Act requirements. We also have a detailed process for the retrieval of wage determinations as well as additional classifications with complete instructions. These are uploaded to our grant's management software IowaGrants. Compliance with the requirements are verified up front as well as during monitoring of projects. Annually, IEDA holds a Davis Bacon training for recipients and grant administrators.

Environmental Review:

The environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects, including CDBG-DR funded projects, to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Recipients follow 24 CFR 58. IEDA acts as HUD and releases funds on projects that are completed by a unit of general local government including opportunities for the public to review and comment on these environmental reviews.

IEDA does intend to accept other federal agency (FEMA) ERR documentation for our matching buyout program. IEDA is authorized to do this by the following language in P.L. 166-20: *That, notwithstanding the preceding proviso, recipients of funds provided under this heading that use such funds to supplement Federal assistance provided under section 402, 403, 404, 406, 407, 408(c)(4), or 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) may adopt, without review or public comment, any environmental review, approval, or permit performed by a Federal agency, and such adoption shall satisfy the responsibilities of the recipient with respect to such environmental review, approval or permit: Provided further, That, notwithstanding section 104(g)(2) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(g)(2)), the Secretary may, upon receipt of a request for release of funds and certification, immediately approve the release of funds for an activity or project assisted under this heading if the recipient has adopted an environmental review, approval or permit under the preceding proviso or the activity or project is categorically excluded from review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.):*

Therefore, after consultation with our HUD CPD specialist, it is allowable for our recipients to adopt another agency ERR without reproducing it on HUD forms or publishing a new notice and conducting their own public comment period. IEDA as the agency that acts as HUD and releases funds would also not need to allow for a comment period and can immediately release funds upon receipt of the Request for Release of Funds Form.

In the 2019 CDBG-DR policy and procedure manual, there is a section that pertains to environmental review process as well as the process for accepting other federal agency reviews. IEDA also has a dedicated staff member that review recipient ERR's and releases funds on HUD projects. Compliance with the environmental review process is verified with recipient

uploaded ERR's in our grant's management software IowaGrants. Compliance with the requirements are verified up front as well as during monitoring of projects. Annually IEDA holds an Environmental Review training for recipients and grant administrators.

Should in the future, activities be added that would result in construction in the 100-year floodplain or a Critical Action in the 500-year floodplain, triggering the need for proper elevation, Elevations standards for new construction, repair of substantial damage, or substantial improvement as stated in 83 CFR 5844 will be required. These elevation standards will be incorporated into the Iowa Green Streets Criteria and will be applicable to any new housing production, or any future applicable program added through an amendment of the Action Plan.

Acquisition and Relocation:

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act). The Uniform Act provides important protections and assistance for people affected by the acquisition, rehabilitation, or demolition of real property for Federal or federally funded projects. This law was enacted by Congress to ensure that people whose real property is acquired, or who move as a direct result of projects receiving Federal funds, are treated fairly and equitably and receive assistance in moving from the property they occupy. On October 1, 2014, Section 1521 of the Moving Ahead for Progress in the 21st Century (MAP-21) provisions changed payment limits and replacement housing payment eligibility criteria in the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). IEDA will use CPD-14-09 for more guidance on this issue.

HUD has issued various guidance and forms to assist in the compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, including Handbook 1378.0, Tenant Assistance, Relocation and Real Property Acquisition Handbook.

Acquisition and relocation is a process IEDA's recipients will need to review prior to acquiring property as part of their CDBG-DR project. In summary, before beginning a project, the recipient will determine if real property acquisitions are subject to URA voluntary acquisition requirements, or if they are subject to the full acquisition requirements of 49 CFR 24 Subpart B. 4. Real property may need to be appraised in accordance with URA appraisal requirements and an offer of just compensation will need to be given to the seller.

Depending on the type of acquisition, the recipient will need to understand if the occupant is entitled to relocation assistance. All efforts to minimize displacement will be taken when possible, particularly for infrastructure activities, where alternatives may be considered to minimize and/or reduce displacement.

Per 83 FR 5858 the one-for-one replacement requirements at section 104(d)(2)(A)(i) and (ii) and (d)(3) of the HCD Act and 24 CFR 42.375 are waived in connection with funds allocated under this notice for lower-income dwelling units that are damaged by the disaster and not suitable

for rehabilitation. The section 104(d) one-for-one replacement requirements generally apply to demolished or converted occupied and vacant occupiable lower-income dwelling units. This waiver exempts disaster-damaged units that meet the grantee's definition of "not suitable for rehabilitation" from the one-for-one replacement requirements.

The definition of "not suitable for rehabilitation" will be any units within the inundated area of the March 2019 flood event that if acquired and demolished would create a benefit to floodplain management of the area.

Fair Housing:

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. 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.

There are also other Acts that are considered: Title VI of the Civil Rights Act of 1964 as amended in 1988, Title VIII of the Civil Rights Act of 1968 (Fair Housing Act, 42 U.S.C. 3601-3619) as amended, Architectural Barriers Act of 1968, Section 504 of the Rehabilitation Act of 1973, Section 508 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990 as well as other Acts and various executive orders.

The Fair Housing Act (and subsequent laws reaffirming its principles) not only prohibited discrimination in housing related activities and transactions but also imposed a duty to affirmatively further fair housing (AFFH). As part of meaningfully implementing the fair housing regulations state and each local government to certify that it will affirmatively further fair housing. AFFH is defined in the regulations as: having an Analysis of Impediments (AI) to fair housing choice; taking appropriate actions to overcome the effects of identified impediments; and keeping records reflecting the analysis and showing the actions taken. The state is required to assume responsibility by: conducting an analysis to identify impediments to housing choice; taking appropriate actions to overcome the effects of the impediments; maintaining records of analysis and actions; and ensuring that units of local government funded by the State comply with the certification requirements.

The state's latest AI can be found on the website:

<https://www.iowaeconomicdevelopment.com/our-agency-detail-resources/6501>.

Limited Language English Proficiency (LEP):

EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance and finalized the guidance on February 21, 2007. It is entitled: "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons". IEDA has LEP Guidance in the CDBG-DR policy and procedure manual, and in Appendix B of this document.

Application Evaluation

Application Evaluation will vary by program. All applications within a program type will be treated fairly and equitably. Some programs may have no competition, based on agency policy, while others must meet eligibility thresholds, and still other programs will be competitive with application rounds and uniform scoring. A summary of the application evaluation is as follows:

Program	Application Evaluation Process
Buyout FEMA Match	No competition, contracts will be made directly with the communities eligible for FEMA HMGP buyouts. Award amounts will be determined through consultation with HSEMD and the local community.
New Construction Housing – including infrastructure in support of housing and down payment assistance.	IEDA will publish competitive application rounds. All applications within a round will be reviewed, scored, ranked, and awarded based on score. A minimum threshold score will be established to ensure high quality projects are selected. Program will be limited to the MID Counties only.
Infrastructure (Stormwater and Public)	<p>Applications will be submitted to IEDA on an open-cycle. IEDA will limit applications to the MID for the first two years of the program. After the first two years, the applications will be open to municipalities in any of the presidentially declared counties.</p> <p>All infrastructure must be directly related to the disaster and stormwater infrastructure must be in support of LMI Housing (either new or existing housing). A minimum threshold will be applied to ensure applications are eligible for funding and meet the program requirements. Once IEDA determines a project eligible for funding, IEDA will contract with the municipality based on the application submitted.</p>
Planning	IEDA will issue Requests for Proposals (RFP)s as needed for Planning Awards.

CDBG-DR Program National Objectives

1. OVERALL REQUIREMENTS:

- a. 80% of the total grant amount (\$77,392,800) must benefit the Most Impacted and Distressed (MID) areas determined by HUD to be Mills, Fremont, and Harrison Counties, and expanded to include Harrison County on June 1, 2020. The remaining 20% of funds (\$19,348,200) will be available to benefit other counties Presidentially Declared and FEMA designated for Public Assistance and/or Individual Assistance under Disaster Declaration DR-4421.
- b. 70% of the total funds must benefit low- to moderate-income (LMI) persons (approximately \$64 million)
- c. All funded activities must meet 1 of 3 national objectives:
 - i. Benefit persons of low- and moderate-income, or

- ii. Aid in the prevention or elimination of slums or blight, or
 - iii. Meet other urgent community development needs
 - d. Programs must stem from an unmet recovery need not already addressed by other federal, state/local, nonprofit funds, or private insurance. Grantees will be required to document a connection to the disaster.
2. THE PRIORITIES OF THE STATE SHALL BE TO:
- a. Address needs of the most vulnerable populations.
 - b. Address the needs of low- to moderate income persons and families.
 - c. Mitigate risk and hazards due potentially related to future natural disasters.



March 28, 2019 – South of Percival

<u>Action Plan Need</u>	<u>Activity</u>	<u>HUD National Objective</u>	<u>HUD Eligible Activity</u>	<u>Funding Amount</u>	<u>Action Plan Amount</u>
Housing	Buyout FEMA Match	LMB	Acquisition & demolition	\$2,363,593	\$90,468,676
Housing	Buyout FEMA Match	UN	Acquisition & demolition	\$5,391,034	
Housing	Construction of New Housing with Down Payment Assistance	LMH	Housing	\$30,759,822	

Housing	Construction of Rental Housing	LMH	Housing	\$9,770,135	
Housing	Infrastructure in support of Housing (roads, utilities, etc.)	LMA	Housing	\$42,184,092	
Infrastructure	Public / Stormwater Management	LMA	Public Facilities	\$2,692,304	\$2,692,304
Planning	Planning	N/A	Planning	\$710,256	\$710,256
Administration	Admin	N/A	Admin	\$2,692,304	\$2,692,304

Housing Program Summaries

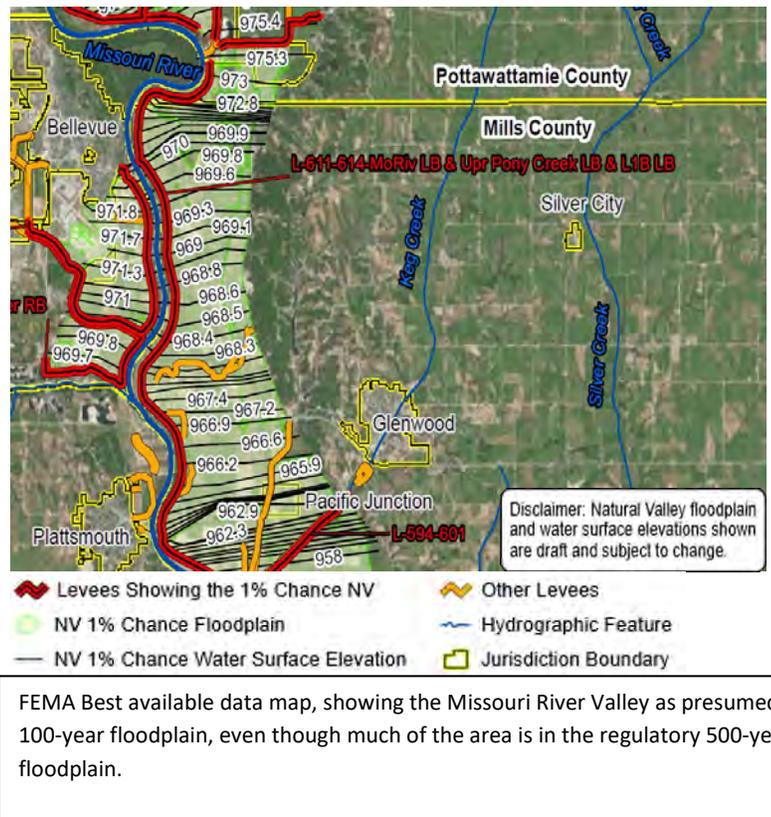
Buyouts FEMA Match

Program eligible activities include acquisition buyout of residential real property, clearance and demolition. The term “buyout” as referenced in this plan refers to acquisition of properties located in a floodway and floodplain that is intended to reduce risk from future flooding and the acquisition of properties in Disaster Risk Reduction Areas as designated by the grantee. The key factor in determining whether the acquisition is a buyout is whether the intent of the purchase is to reduce risk of property damage in a floodplain or a Disaster Risk Reduction Area. All properties acquired under this program will be Buyouts.

The IEDA is working closely with Iowa Homeland Security and Emergency Management (IHSEMD), the lead state agency for the FEMA-funded Hazard Mitigation Grant Program (HMGP) buyouts. Typically, FEMA HMGP buyouts are limited to properties located within the floodway or 100 year floodplain; however, due to the unique geography of this flood impacted area, and the failure of the levees protecting the Missouri River Valley as 500-year floodplain, IHSEMD and FEMA are using best available data to determine eligible buyout areas. All eligibility for this program will be established by IHSEMD, in coordination with FEMA. CDBG-DR funding will be used to cover the State and Local match, for a minimum grant match of 25%. As the HMGP need is higher than available HMGP funding, CDBG-DR may provide more than the 25% minimum match, in order for HMGP to provide buyouts to more eligible municipalities. The Match will be determined based on:

- Percentage of LMI persons participating in the Buyout,
- The location of Buyouts within the HUD MID Counties,
- Available funding.

As the HMGP program is income blind, IEDA will coordinate the income verification of all participants to determine if the acquisition will qualify as meeting the LMB National Objective. Any over-income (80% AMI) will be funded under the Urgent Need National objective. IEDA will work with the local communities, and HSEMD to calculate the award amount for FEMA Match



buyouts to ensure that all flood impacted victims are treated equitably and receive equal compensation for their buyout. Contracts between IEDA and the participating municipalities will outline the total amount of CDBG-DR awarded to the buyout and the number of properties participating in the program.

This will be a program that provides pre-disaster fair market value (FMV) to buyout applicants, as such, it provides compensation at an amount greater than the post-disaster FMV. When the purchase price exceeds the current FMV, any CDBG-DR funds in excess of the FMV are considered assistance to the seller, thus making the seller a beneficiary of CDBG-DR assistance. If the seller receives assistance as part of the purchase price, this may have implications for duplication of benefits calculations or for demonstrating national objective criteria, as discussed below.

Low/Mod Buyout (LMB) Low/Mod Buyout (LMB). When CDBG-DR funds are used for a buyout award to acquire housing owned by a qualifying LMI household, where the award amount is greater than the post-disaster fair-market value of that property; urgent need will be used for any household that does not qualify as LMI.

As FEMA will be the Lead Agency for these HMGP buyouts, the CDBG-DR program will assume their compliance with federal laws and executive orders, including environmental review. The CDBG-DR program will concur with the FEMA approved appraisals and offers of buyout as long as all offers exceed the post-disaster fair market value, as required to qualify under the LMB National Objective.

In accordance with HMGP requirements, all properties acquired, accepted, or from which a structure will be removed pursuant to the project will be dedicated and maintained in perpetuity, with a deed restriction or covenant running with the property, for a use that is compatible with open space, recreational, or floodplain and wetlands management practices.

As buyouts remain a voluntary process until closing, it is challenging to fully estimate amounts, but as of the writing of this Plan, 278 properties in the MID counties are being considered for buyout, as such the State is anticipating approximately 300 properties could be included in this activity over the life of the grant.

New Housing Production

This activity is limited to Mills, Fremont, and Harrison Counties only.

Communities will face significant needs for restoring and improving the housing stock. This is necessary to both replace the large number of houses participating in the buyout as well as increasing affordable housing. New construction of housing units is the construction of single-family houses and multi-family structures on vacant lots within existing neighborhoods, or the development of new neighborhoods for residential purposes. This approach is used to create more affordable housing, while promoting community revitalization. CDBG-DR funds are

eligible to assist new construction activities as stated by the waiver providing alternative requirements (83 FR 5844 Section VI, B. 32). The State is referencing Federal Register Notice 83 FR 5844, in order to clarify the ability for these CDBG-DR funds to be used for the purpose of the construction of new housing units, “Alternative requirements are adopted to the extent necessary to permit new housing construction, and to require construction standards on structures constructed with CDBG-DR funds as part of activities eligible under 42 U.S.C. 5305(a.)”

Based on the disaster impact and the 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. While an initial focus will be on the replacement of housing units lost as a result of the disaster, with approximately 23% rental units (based on 68 rental buyouts out of 278 total buyouts), the State understands the value of increasing single family homeownership opportunities as a tool to build wealth and reduce poverty, particularly for low-and-moderate income households. The State is currently anticipating the creation of 300 new housing units over the life of this grant.

The State of Iowa’s New Housing Production program will involve a financial investment in the construction of new housing units. The New Construction Program will be limited to the MID Counties. Municipalities must coordinate with developers/builders to submit an application to IEDA for the financial investment in the construction of new housing units.

Program Guidelines will be fully developed for this New Housing Program, but will include:

- \$75,000 per housing unit award for construction reimbursement with CDBG-DR.
 - Single Family Construction - Awarded as a Grant, with 10% retainage held until LMI qualified buyer occupies the home.
 - Multi-Family New Construction – Awarded as a Non-Receding Forgivable Loan in the amount of the award for the Affordability Period, with 10% retainage held until LMI qualified tenants occupy 51% of units.
- Developer chooses to construct housing units for Sale or for Rent.
- Developer must own the building lots or can demonstrate site control.
- 40-unit maximum number of units per application.
- All units must have access and connection to municipal utilities including water and sewer, no project dependent on wells and/or septic will be eligible.
- All properties must be located outside of the 100-year floodplain and priority will be given to projects located outside of the 500-year floodplain.
- CDBG-DR Financial investment award can be drawn down mid-construction with supporting documentation of costs incurred.
- All units must be marketed to citizens directly impacted by the 2019 Disaster Event for 4 months, before being offered to an eligible member of the general public.

- Sale of all housing units is capped at \$175,000 and all sales must be to LMI qualified buyers.
- All new housing developments/sub-divisions (construction of homes on land previously not used as residential) will be required to participate in an IEDA planning and/or design consultation process prior to applying for CDBG-DR construction funding. This will ensure that proper stormwater management and green building practices are incorporated into new housing developments.
- All Units must comply with HUD stipulated Affordability Period for New Construction, where all buyers and 51% of tenants will be income verified at or below 80% AMI, and all rents will be capped at the applicable 65% HOME Rates:
 - 5-years for Single Family Homes or Multi-family of 4 units or less
 - 20-years for Multi-Family developments of 5 units or more
 - Affordability Period does not apply to housing units newly constructed for an owner-occupant to replace an owner-occupied home that was destroyed by the disaster.

Selection Methodology/Scoring: As noted above, 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 high quality projects are selected. This program will be limited to the MID Counties only. Scoring priorities will include but are not limited to:

- Readiness to Proceed – how quickly can a project move from award to construction, this includes site control, established financing, project plans and specifications.
- 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, etc.
- Financial Stability and Proven Record of Development Team – demonstrating experience
- Proximity to the Disaster Impacted Area
- Furthering Orderly/Planned Development

Cost Reasonableness: The State of Iowa will prepare a memo documenting how average home construction costs were generated and how the developer cash, sale cap, and buyer's capacity were determined. In brief, IEDA has utilized data from other state new construction programs to determine that a reasonable cost for new construction in Mills, Fremont, and Harrison Counties is \$225,000 - \$250,000. The average home value of a pre-flood disaster property is around \$70,000. With a sale cap of \$175,000, the average buyer could apply their buyout benefits to the purchase, potentially a CDBG down payment assistance if still needed, and be able to afford a much lower mortgage, while the developer would not receive much more than the cost to construct the home. This assumes the developer owns the land. If land acquisition is added, the developer's profit margin further decreases (in some instances, land is currently owned by municipalities and will be made available for development at little cost to the builder).

All homes constructed under this program will be required to comply with a Green Building Standard or equivalent as stipulated in the Iowa Green Streets program. The Iowa Green Streets program fully integrates accessibility into the construction standards, enforcing Section 504 of the Americans with Disabilities Act. Furthermore, through public outreach, the State has identified housing for seniors and ADA accessible housing as a regional need. The State's scoring methodology will reflect this priority. In addition, HUD has strongly encouraged CDBG-DR recipients to incorporate a Resilient Home Construction Standard. The New Housing Production policies and procedures will include further details for these standards along with Quality Construction Standards. The cost of Green Streets compliance is assumed in the initial cost reasonableness assessment above, however, builders who choose to construct high-performance, resilient buildings may submit a request for additional funding for the increased costs of high-performance or resilient construction. Each request must include a cost comparison analysis to justify the request for increased funds beyond the established \$75,000 per unit max.

While this program is currently limited to new production of housing outside of the floodplain, should in the future activities be added that would result in construction in the 100-year floodplain or a Critical Action in the 500-year floodplain, triggering the need for proper elevation, elevation standards for new construction, repair of substantial damage, or substantial improvement as stated in 83 CFR 5844 will be required. These elevation standards will be incorporated into the Iowa Green Streets Criteria and will be applicable to this new housing production, or any future applicable program added through an amendment of the Action Plan.

Infrastructure in support of housing will also be included in this financial investment in the construction of new housing units. For all housing applications that require the construction of roads, utility access including broadband where practicable, stormwater management, etc. the developer will provide a line-item request for such funding. This request will be outside of the per-unit housing maximum and must be based on actual construction estimates. Additionally, if other funding sources are available to cover such costs such as Tax Increment Financing or Department of Transportation funds, those sources must be sought, and CDBG-DR funding will only be awarded when no other funding sources is available for the creation of roads necessary for the production of new housing units. Each request must include a cost analysis and justification for the additional line-item request for infrastructure funding.

Housing newly constructed with CDBG-DR funds and made available for affordable homeownership or tenant occupancy to low- and moderate-income persons, and to enforce those restrictions through recorded deed restrictions, covenants, or other similar mechanisms, for a period not less than five years, and up to twenty years for developments of five units or more. Grantees shall establish resale or recapture requirements for housing funded pursuant to this paragraph and shall outline those requirements. 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.

In addition to the above structure, the State will allow eligible municipalities to apply to the State for costs associated with directly developing housing units. Based on local municipal interest and capacity, eligible cities or counties could directly develop housing units by procuring construction contractors to construct new housing and infrastructure in support of housing. As such, those municipalities choosing to run their own direct housing program may or may not utilize the structure above, but will formalize their development plan, including CDBG-DR financial assistance in application to IEDA.

Down-payment Assistance

The CDBG-DR funds may be used for down payment assistance upon completion of the construction housing units. The maximum allowed is 50 percent of the required down payment, based on lender requirements and credit assessment of the buyer, plus closing costs. Qualified LMI households, under 80% 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.

The State will coordinate with HUD-certified housing counseling organizations by sharing this action plan and requesting their comments. Such organizations may identify a role in the above program activities as applicable.

Additional resources on HUD's Housing Counseling Program including a list of participating agencies on HUD's website and the program page on HUD Exchange:

https://www.hud.gov/program_offices/housing/sfh/hcc

<https://www.hudexchange.info/programs/housing-counseling/>

CPD notice 07-08, provides additional guidance as to how to use CDBG and CDBG-DR to fund housing counseling activities:

<https://www.hudexchange.info/resource/2771/notice-cpd-07-08-use-of-cdbg-program-funds-in-support-of-housing/>

Office of Housing Counseling's Disaster Planning and Recovery Toolkit in order to prepare for disaster events and engage with local partners that receive funding following disasters. The toolkit can be found at:

<https://www.hudexchange.info/programs/housing-counseling/topics/#disaster-recovery-toolkit>

Infrastructure

In addition to the infrastructure in support of housing mentioned above (specifically for new subdivisions or developments), the IEDA will create an infrastructure and storm water management infrastructure program. These funds are intended to improve disaster damaged

infrastructure and increase stormwater management in order to make the disaster affected communities more resilient to flood water impacts and prevent future disaster events. These stormwater practices may:

- Repairs to disaster damaged public infrastructure (damage must be documented as disaster related. Funds can match FEMA eligible projects, but cannot supplant or duplicate FEMA funding)
- Increase stormwater capacity of existing facilities.
- Install new stormwater utilities where such service is needed but does not exist.
- Install new stormwater management practices installed on deed-restricted buyout land, including but not limited to:
 - Wetland creation or expansion
 - Bioretention cells
 - Rain Gardens
 - Ponds
 - On-road structures
- Install new stormwater management on non-buyout but publicly owned/managed land for storm water mitigation.
- All infrastructure should document a connection to housing needs, unless the State has notified HUD that all unmet housing needs have been satisfied.
- All applications for infrastructure must be based on engineered plans and cost estimates

Municipalities in all 80 counties included in the presidentially declared FEMA designated Public Assistance counties will be eligible for infrastructure for stormwater management. These applications will be submitted by the municipality to IEDA in a “open cycle” format. The constructed practices will be considered public infrastructure and be owned and maintained by the municipality or county that applies for the funding.

While the State may document these infrastructure activities under National Objectives and Eligible Activities that are not specifically associated with Housing, the intent of this infrastructure program is designed to either improve or protect residential areas, therefore projects funded under these activities will primarily address unmet housing needs.

Planning

Immediately after the disaster event, the State of Iowa considered the response and recovery effort from a holistic perspective. While the Governor’s Flood Recovery Advisory Board working groups focused on individual topics, the groups frequently crossed over and jointly updated the Board on response and recovery needs and efforts. Through that process, the State generated and submitted a comprehensive land use planning grant application to the US Department of Commerce’s Economic Development Administration (EDA). The purpose of the planning effort is to collaborate multiple State and Federal agencies, local municipalities and industries in the flood impacted region to fully assess the best and highest uses of land in order to prevent future loss while recovering and expanding economic opportunities. The IEDA is still awaiting a

determination on this grant application. If awarded, some CDBG-DR funds may be used as match for the EDA planning grant.

Furthermore, the IEDA has identified a need for planning to assist project implementation regarding high-performance housing and green infrastructure. Some planning funds may be made available for the creation and dissemination of technical assistance and planning tools to support housing designers, builders, and infrastructure engineers to ensure that high performance design techniques are utilized to maximize the federal investment in these projects.

All planning efforts will go through a specific Request for Proposals (RFP) process with a clear scope of work and a cost reasonableness evaluation prior to proposal review.

Projections of Expenditure and Outcomes

Activity projects will be divided between FEMA Match Buyouts, Rental Housing New Construction, Single Family New Construction, Infrastructure in Support of Housing expenditures, Planning expenditures, and Stormwater Infrastructure expenditures. Each quarter, these projects will be updated with their actual expenditures. This assumes a CDBG-DR contract date in Q3 of 2020, and the first SPR submitted after Q4 2021.

FEMA Match Buyouts

Assumes 300 units

<u>Quarter</u>	<u>Projected Total Units Bought Out</u>	<u># of Buyout Units (Quarterly Projection)</u>	<u>Actual Units Completed (QPR)</u>
Jan-21	0	0	
Apr-21	20	20	
Jul-21	40	20	
Oct-21	60	20	
Jan-22	80	20	
Apr-22	100	20	
Jul-22	120	20	
Oct-22	125	10	
Jan-23	130	10	
Apr-23	140	10	
Jul-23	150	10	
Oct-23	160	10	
Jan-24	180	10	
Apr-24	200	10	
Jul-24	210	10	
Oct-24	220	10	
Jan-25	230	10	
Apr-25	240	10	
Jul-25	250	10	
Oct-25	260	10	
Jan-26	270	10	
Apr-26	280	10	
Jul-26	290	10	
Oct-26	300	20	

Rental Housing New Construction

Assumes 111 units

<u>Quarter</u>	<u>Projected Total Units Bought Out</u>	<u># of Buyout Units (Quarterly Projection)</u>	<u>Actual Units Completed (QPR)</u>
Jan-21	0	0	
Apr-21	0	0	
Jul-21	0	0	
Oct-21	5	5	
Jan-22	10	5	
Apr-22	15	5	
Jul-22	20	5	

Oct-22	25	5	
Jan-23	30	5	
Apr-23	35	5	
Jul-23	40	5	
Oct-23	45	5	
Jan-24	50	5	
Apr-24	55	5	
Jul-24	60	5	
Oct-24	66	6	
Jan-25	72	6	
Apr-25	78	6	
Jul-25	84	6	
Oct-25	90	6	
Jan-26	96	6	
Apr-26	101	5	
Jul-26	106	5	
Oct-26	111	5	

Single Family New Construction

Assumes 115 new housing units constructed and occupied by qualified owners/tenants

<u>Quarter</u>	<u>Projected Total Units Constructed</u>	<u># of New Housing Units (Quarterly Projection)</u>	<u>Actual Units Completed (QPR)</u>
Jan-21	0	0	
Apr-21	0	0	
Jul-21	0	0	
Oct-21	5	5	
Jan-22	10	5	
Apr-22	15	5	
Jul-22	20	5	
Oct-22	25	5	
Jan-23	30	5	
Apr-23	35	5	
Jul-23	40	5	
Oct-23	45	5	
Jan-24	50	5	
Apr-24	55	5	
Jul-24	60	6	
Oct-24	65	7	
Jan-25	70	6	
Apr-25	75	7	
Jul-25	80	5	
Oct-25	85	5	
Jan-26	90	5	
Apr-26	105	5	
Jul-26	110	6	
Oct-26	115	8	

Infrastructure in Support of Housing

<u>Quarter</u>	<u>Projected Expenditure Total</u>	<u>Quarterly Projection</u>	<u>Actual Expenditure</u>
21-Jan	\$0.00	\$0.00	
21-Apr	\$1,755,364.00	\$1,755,364.00	
21-Jul	\$5,266,092.00	\$1,755,364.00	
21-Oct	\$5,266,092.00	\$1,755,364.00	
22-Jan	\$7,021,456.00	\$1,755,364.00	
22-Apr	\$8,776,820.00	\$1,855,959.00	
22-Jul	\$10,632,779.00	\$1,855,959.00	
22-Oct	\$12,488,738.00	\$1,855,959.00	
23-Jan	\$14,344,697.00	\$1,855,959.00	
23-Apr	\$16,200,656.00	\$1,855,959.00	
23-Jul	\$18,056,615.00	\$1,855,959.00	
23-Oct	\$19,912,574.00	\$1,855,959.00	
24-Jan	\$21,768,533.00	\$1,855,959.00	
24-Apr	\$23,624,492.00	\$1,855,959.00	
24-Jul	\$25,480,451.00	\$1,855,959.00	
24-Oct	\$27,336,410.00	\$1,855,959.00	
25-Jan	\$29,192,369.00	\$1,855,959.00	
25-Apr	\$31,048,328.00	\$1,855,959.00	
25-Jul	\$32,904,287.00	\$1,855,959.00	
25-Oct	\$34,760,246.00	\$1,855,959.00	
26-Jan	\$36,616,205.00	\$1,855,959.00	
26-Apr	\$38,472,164.00	\$1,855,959.00	
26-Jul	\$40,328,123.00	\$1,855,959.00	
26-Oct	\$42,184,092.00	\$1,855,969.00	

Planning Funding

<u>Quarter</u>	<u>Projected Total Expenditure</u>	<u>Quarterly Projection</u>	<u>Actual Expenditure (QPR)</u>
Jan-21	\$0.00	\$0.00	
Apr-21	\$80,000.00	\$80,000.00	
Jul-21	\$160,000.00	\$80,000.00	
Oct-21	\$240,000.00	\$80,000.00	
Jan-22	\$320,000.00	\$80,000.00	
Apr-22	\$400,000.00	\$80,000.00	
Jul-22	\$480,000.00	\$80,000.00	
Oct-22	\$560,000.00	\$80,000.00	
Jan-23	\$640,000.00	\$80,000.00	

Stormwater Infrastructure Funding

<u>Quarter</u>	<u>Projected Expenditure Total</u>	<u>Quarterly Projection</u>	<u>Actual Expenditure (QPR)</u>
Jan-21	\$0.00	\$0.00	
Apr-21	\$117,057.00	\$117,057.00	
Jul-21	\$351,171.00	\$117,057.00	
Oct-21	\$351,171.00	\$117,057.00	
Jan-22	\$468,228.00	\$117,057.00	
Apr-22	\$585,285.00	\$117,057.00	
Jul-22	\$702,342.00	\$117,057.00	
Oct-22	\$819,399.00	\$117,057.00	
Jan-23	\$936,456.00	\$117,057.00	
Apr-23	\$1,053,513.00	\$117,057.00	
Jul-23	\$1,170,570.00	\$117,057.00	
Oct-23	\$1,287,627.00	\$117,057.00	
Jan-24	\$1,404,684.00	\$117,057.00	
Apr-24	\$1,521,741.00	\$117,057.00	
Jul-24	\$1,638,798.00	\$117,057.00	
Oct-24	\$1,755,855.00	\$117,057.00	
Jan-25	\$1,872,912.00	\$117,057.00	
Apr-25	\$1,989,969.00	\$117,057.00	
Jul-25	\$2,107,026.00	\$117,057.00	
Oct-25	\$2,224,083.00	\$117,057.00	
Jan-26	\$2,341,140.00	\$117,057.00	
Apr-26	\$2,458,197.00	\$117,057.00	
Jul-26	\$2,575,254.00	\$117,057.00	
Oct-26	\$2,692,304.00	\$117,050.00	

Section Six: Program Administration

Administrative Funds

State administrative costs, including grantee administration costs, will not exceed five percent, \$4,837,050 of the \$96,741,000 allocation. Planning and administrative costs combined will not exceed 20 percent of the total allocation. The provisions outlined under 42 U.S.C. 5306(d) and 24 CFR §570.489(a)(1)(i) and (iii) will not apply to the extent that they cap state administration expenditures and require a dollar-for-dollar match of state funds for administrative costs exceeding \$100,000. Pursuant to 24 CFR §58.34(a)(3), except for applicable requirements of 24 CFR §58.6, administrative and management activities are exempt activities under this Action Plan.

Pre-Agreement Costs

The regulation cited at 2 CFR 200.458 defines pre-agreement costs as “those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency”.

Since the disaster occurred in the spring of 2019 and access to the disaster funding is expected in fall 2020, the Iowa CDBG-DR Program anticipates the request of pre-agreement costs, consistent with the regulation, the accompanying CPD Notices and the related Federal Register for only a few specific project costs incurred. Once a grant agreement is fully executed, the Iowa CDBG-DR Program will allow the drawdown of pre-agreement costs associated with eligible costs associated with the set-up and establishment of the CDBG-DR programs. The Iowa CDBG-DR Program will submit only those costs that follow the CDBG cross-cutting regulations and only those that are a direct result of activities related to the presidentially declared flooding event. No requests shall be of the size or amount that will cause a substantial amendment to the Action Plan and all costs will be clearly identified in a category recognized in the Action Plan.

Citizen Participation Plan

The State of Iowa created a thorough citizen participation plan that encourages all citizens to participate in the development of the Action Plan for funds associated with the Supplemental Disaster CDBG, as prescribed in Public Laws 116-2 and further detailed in the applicable Federal Register Notices. These funds were provided to assist with unmet needs remaining from the historic flooding events in Iowa during the Spring of 2019. This citizen participation plan was developed in accordance with the requirements listed in 24 CFR Part 91.115 (Citizen Participation Plan for States). The plan provides citizens (including minorities, the disabled and non-English speaking persons), units of local government, and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so. The full Citizen

participation plan is included in the Policies and Procedures document for this disaster event and posted on IEDA's website.

Publishing the Plan, Comments and Amendments

The State makes every effort to publish the draft 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. To do this, the draft Action Plan was published and made available to the public on or around May 1, 2020. The plan will remain available on the IEDA website (<https://www.iowaeconomicdevelopment.com/>). To notify the public of the plans' availability, public notification was provided via newsletter, press release, direct email and via partnering associations such as the Iowa League of Cities and Iowa Association of Councils of Government. The plan was also sent to other partner state agencies. The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments, as the State would also provide a copy of the plans to interested parties upon request. Comments would be accepted until June 1, 2020. The State will make the plan available for a minimum 30-day comment period.

The State considers any comments or views of citizens and units of general local government received in writing or orally in preparing the final Action Plan. A summary of these comments, including those not accepted and reasons therefore, will be attached to the final consolidated plan.

Substantial Amendments to the Action Plan will require public notice. The public notice will be made in the same manner as prescribed in this document. The thresholds for a substantial amendment are as follows:

1. Action Plan – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:
 - a. A change in program benefit or eligibility criteria;
 - b. The addition or deletion of an activity; or
 - c. The allocation or reallocation of CDBG-DR funds within existing programs in excess of five million dollars per occasion.

Performance Reports

The State provides reasonable notice and an opportunity to comment on performance reports required as part of the funding. Comments received on the performance reports are recorded, and a summary of the comments is attached to the performance report

Requirements for Local Governments Receiving CDBG Funds

Recipients of CDBG funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be

kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them.

Citizens shall be provided adequate and timely information, to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least 1) the determination of needs, 2) the review of the proposed activities, and 3) the review of past program performance, in the following manner:

1. At least two public hearings shall be scheduled at times and locations felt to be most likely to make it possible for the majority of interested persons to attend without undue inconvenience, addressing the three items above. At least one hearing must be held to address items (1) and (2) above prior to the submission of the application for housing and/or non-housing needs. Item 3 must be addressed in a public hearing to review performance of the recipient in a previous program and must occur prior to closeout of any loan or grant for which performance evaluation has not occurred in a previous hearing.
2. Notification of all hearings shall be given a minimum of five full days in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution. Additional advertisement may be conducted by posting letters, flyers and any other forms which seem practical; however, publication is required. All hearings must be accessible to handicapped persons.

Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance.

The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the decision-making time. Any criticism submitted in writing at any time should be answered in writing within fifteen working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Availability to the Public

The State will provide the Action Plan, as adopted, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at <https://www.iowaeconomicdevelopment.com/>.

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the State's Action Plan and the State's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the State has designated an appropriate and practicable procedure to handle complaints from citizens related to the this disaster action plan, amendments, and performance reports. Upon receiving a complaint, the State will provide a timely, substantive written response to written citizen complains within a fifteen working day time period. Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1- 800-347-3735 or email: hotline@hudoig.gov).

Measures for Language Access Plan– IowaCDBG Language Access Plan:

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons). The State of Iowa CDBG and CDBG-DR programs are a recipient of federal funds and, thus, obligated to reduce language barriers that can preclude meaningful access by LEP persons to DCA programs. Iowa CDBG has prepared Iowa CDBG LEP Guidance, which defines the actions to be taken to ensure meaningful access to agency services, programs, and activities on the part of persons who have limited English proficiency. This guidance may be found in Appendix B of this document. The State has used the LEP data provided earlier in this document and determined that LEP the population in the MID counties is below the threshold to trigger translation and posting of documents prior to a specific request for such services. In accordance with the Iowa CDBG Language Access Plan, all individual requests for services will be considered and accommodations provided when reasonable.

Resources Used to Inform Action Plan:

Iowa Dashboard – Iowa Finance Authority: <http://www.westernes.com/iowa/>

Iowa Floods 2019 – State of Iowa: <https://floods.iowa.gov/>

FEMA DR-4421: <https://www.fema.gov/disaster/4421>

Iowa Flood Information System: <http://ifis.iowafloodcenter.org/ifis/>

Iowa Flood Mitigation Board:

https://www.homelandsecurity.iowa.gov/about_HSEMD/flood_mitigation_board.html

HUD CDBG-DR: <https://www.hudexchange.info/programs/cdbg-dr/>

Iowa Geological Survey: <https://www.iihr.uiowa.edu/igs/>

National Weather Service: https://www.weather.gov/dvn/summary_SpringFlooding_2019

Appendix A –Implementation Plan and Capacity Assessment

As part of our pre-award certifications, the Iowa Economic Development Authority (IEDA) must create an Implementation Plan and Capacity Assessment and submit the plan to HUD with our financial and programmatic certifications. The requirements for the plan and assessment are found in [85 FR 10182](#), with the criteria described in [83 FR 5844](#) section VI.A.1.b (page 5848 - 5849).

Timely information on application status:

- a. IEDA's efforts to sub-recipients: In the programmatic guidelines for each specific program, a timeline for application review will be detailed:
 - i. Application Due Date
 - ii. Application Review Date
 - iii. Application Award Date

Award communications are done by email and formal award letter signed by the Director of IEDA. Unsuccessful applicants will also be notified by letter signed by the Division Administrator of Community Development. The unsuccessful applicants will be told why they did not receive an award.

The guidelines will also indicate a person to contact with questions about the application.

Applications are submitted through our online IowaGrants system and are reviewed by IEDA staff.

- b. Subrecipient efforts with applicants: Subrecipients that will assist individual homeowners via homebuyer assistance programs will establish their own applicant review process, including timely information on application status. That policy will indicate a method of communication, ensure privacy, frequency, and personnel that is responsible for updating application status. At the very least, every applicant will have a contact person and phone number to call about their application.

Capacity Assessment:

1. IEDA staff have been involved in previous disaster recovery efforts. In 2009, the state received \$890,869,466 (73 FR 52870, 73 FR 77818, 74 FR 7244, 74 FR 41146 & DREF) to respond to flooding in 2008. In 2016, the State received \$96,887,177 ([81 FR 36557](#)) as part of the National Disaster Resilience competition.
2. IEDA also administers the annual allocation of regular CDBG funds.
3. IEDA feels confident that it has extensive knowledge of CDBG regulations and has the technical expertise to effectively implement and administer the disaster grant.
4. Capacity Gap: IEDA needs to hire additional staff for the current disaster award. The milestones to hire included:
 - a. Development of the position description: March 2020
 - b. Approval through state system: April/May 2020
 - c. Posting of position: June 2020
 - d. Hiring the position: after the grant agreement is signed with HUD
5. IEDA does not have any outstanding monitoring findings on other awards.

Staffing:

1. The Action Plan for the current disaster recovery award will be very focused. Allowing us to concentrate our efforts on activities that will meet the unmet needs of affected areas in the state.
2. IEDA has performed an internal assessment and concluded that we need to hire an additional 1.5 staff. The organizational chart in Appendix 1 illustrates the vacant positions as well as one staff person for each major activity are of the action plan. One staff person will be for housing programs and the ½ position will be for CDBG sponsored buyouts. The majority, if not all, of the buyouts will be as FEMA match with FEMA taking on the majority of the responsibility for title search and environmental review. Our main responsibility for FEMA matched buyouts will be verification and publication of environmental review requirements, DOB, and additional compliance.
3. IEDA also has a compliance team separate from the disaster recovery team that are responsible for additional monitoring, reimbursement, receiving recipient audits, and contract close-out.
4. The disaster recovery team has project management staff, monitoring, and a technical specialist for labor, procurement, and Section 3 implementation by subrecipients.
5. IEDA will work with the State Auditor to provide additional programmatic and financial auditing through an agreed upon procedures letter. Audit frequency will be agreed to in the letter. The auditor is an independent state agency with an elected official at its administrator. The State Auditor will report any findings to the IEDA director as well as the Governor (chief elected official).

Internal and Interagency Coordination:

1. Communication within the Disaster Recovery and Compliance Team, as well as management, is excellent. The units are co-located together with the team leaders sitting adjacent to each other. Staff are also co-mingled. The teams will have weekly meetings with written issues, to do lists, and areas of additional collaboration. Management for the teams sits in the same general vicinity as the two teams and regularly interact via meetings and informal communication. The legal and financial teams are also located within the building and representatives of those teams will attend the weekly team meetings.
2. IEDA is the lead agency for the award and will interact with our subrecipients via face to face and video conferencing, letters, email, and through our electronic grants management system, IowaGrants. For each subrecipient, there is a project manager at IEDA that is the administrator of their contract.
3. IEDA has a good working relationship with Iowa's homeland security agency, regional and local economic developers from the disaster effected regions, as well as local bankers and chief elected officials. IEDA plans to hold multiple public hearings about the action plan as well as listening sessions as the grant gets underway to be sure recipients and area residents understand that the lines of communication are open.

Technical Assistance:

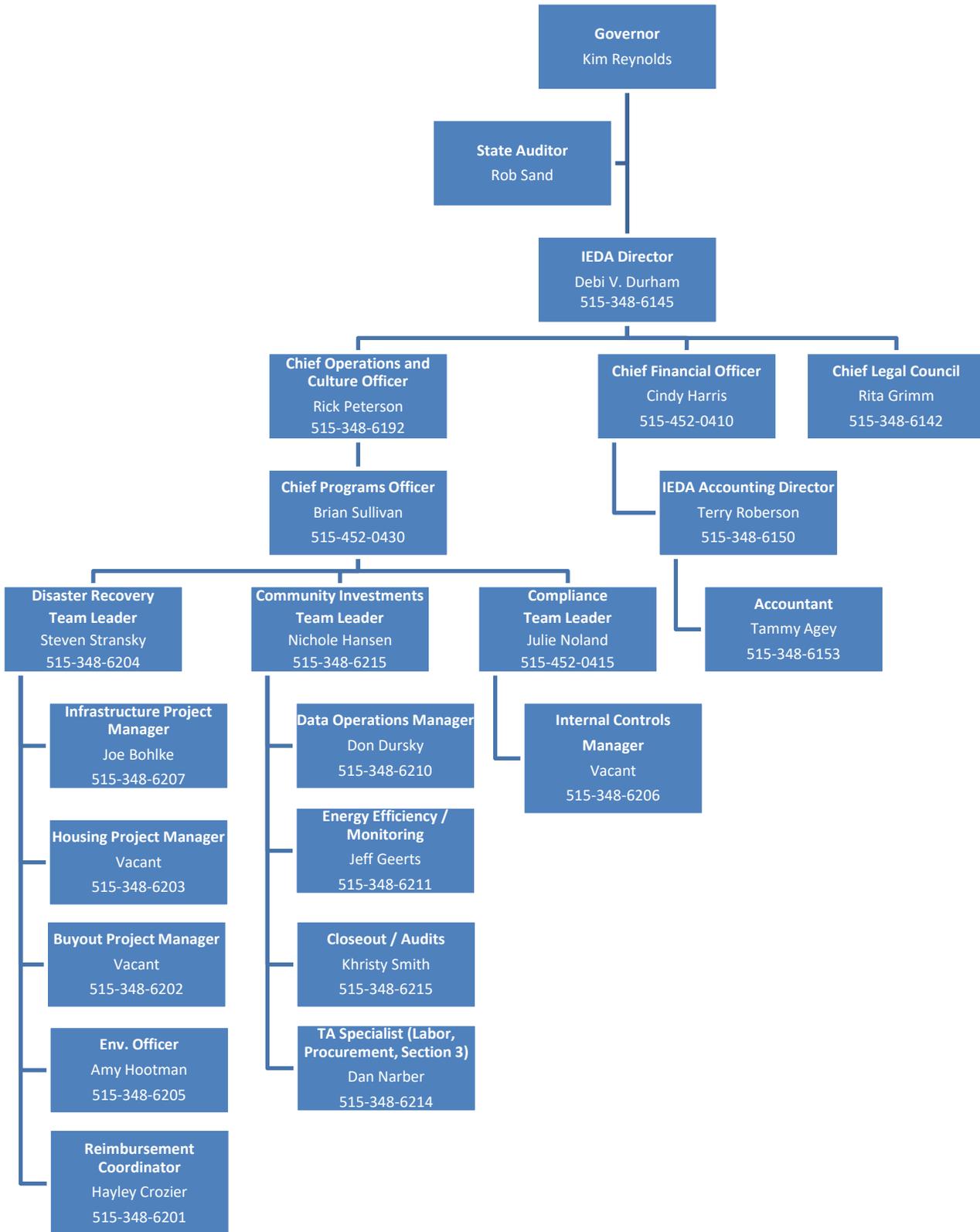
1. Although IEDA feels confident in its knowledge of CDBG regulations, it has plans to hire technical assistance for our sub recipients:

- a. Integrated Design Assistance: IEDA seeks to hire a consultant team with experience in facilitating integrated design workshops, high performance building practices, energy efficient designs and construction, and stormwater best management practices. The consultant team will provide technical assistance to help IEDA recipients and partners to achieve high performing projects emphasizing infiltration-based stormwater practices and meeting or exceeding IEDA's [Iowa Green Streets Criteria](#).
 - b. Historic Preservation Assistance: IEDA seeks to hire to hire a consultant to assist subrecipients in completing Iowa Site Inventory Forms for section 106 consultation.
 - c. Buyout Consultant: IEDA seeks to hire a consultant team with experience in facilitating the CDBG-DR buyout process including legal and title search, records compliance, and file keeping.
2. IEDA will hire these consultants after the grant agreement with HUD is signed, but before sub grantee contracts are signed.

Accountability:

1. IEDA will be the lead agency. The head of IEDA is Director Debi Durham. She reports directly to the Governor Kim Reynolds, the chief elected official for the State of Iowa.

Organizational Chart



Disaster Recovery Website DR-4421

A common means for communication among all parties will be the website. Development and build out of the site will incorporate memorandums, Q&A, best practices, and organizing and posting on the website, any information sought by any of our partners and any potential beneficiaries. The CDBG-DR Program is actively working with the IEDA Communications unit to design and build a dedicated website for the 2019 disaster event. The website will maintain its own address as well as access direct from the IEDA homepage and will contain the following information:

- Draft and final Action Plans
- Action Plan amendments, as applicable
- Grant awards
- Copies of relevant procurement documents, grantee administrative contracts, and details of ongoing procurement processes, as required by Federal Register Notice.
- Program Policies and Procedures
- Program general inquiry phone number and general inquiry email
- General program expenditure and production progress reports
- Public announcements such as application intake beginning, and end periods, etc.

List of Abbreviations

CAA – Community Action Agencies

CDBG-DR -Community Development Block Grants – Disaster Recovery

COG – Council of Government

FEMA – Federal Emergency Management Agency

HMGP – Hazard Mitigation Grant Program (funded by FEMA)

HUD – Department of Housing and Urban Development

LEP – Limited English Proficiency

LMI – Low-to-Moderate Income

LMA – Low-to-Moderate Income Area Benefit

LMB – Low-to-Moderate Income Buyout

LMH - Low-to Moderate Income Housing Benefit

DRF – Disaster Recovery Framework

IEDA – Iowa Economic Development Authority

IHSEMD – Iowa Homeland Security and Emergency Management Department

NDRF – National Disaster Recovery Framework

NFIP – National Flood Insurance Program

PDA – Preliminary Disaster Assessment

PPVL – Personal Property Verified Loss

RPC – Regional Planning Commission

RSF – Recovery Support Functions

SBA – Small Business Administration

VOAD –Voluntary Agencies Active in Disaster

Appendix B – Iowa CDBG LEP Guidance

Background:

EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ’s Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance and finalized the guidance on February 21, 2007. It is entitled: “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons” and can be found here:

<https://www.govinfo.gov/content/pkg/FR-2007-01-22/pdf/07-217.pdf>

Four Factor Analysis: Recipients are required to take reasonable steps to ensure meaningful access to LEP persons. This “reasonableness” standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens. As a starting point, a recipient may conduct an individualized assessment, called the four factors analysis, to determine if translation services are necessary:

1. The number or proportion of LEP persons served or encountered in the eligible service population;
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program; and
4. The resources available and costs to the recipient.

As it relates to how to determine if written translation is necessary, local governments can use this chart

Size of Language Group	Recommendation
1,000 or more LEP in community	Translate vital documents (applications, guidance, etc)
More than 5% of LEP and more than 50 in number	Translate vital documents (applications, guidance, etc)
More than 5% of LEP but less than 50 in number	Translate written notice of right to receive free oral interpretation of documents
5% or less of LEP and less than 1,000 in number	No written translation is required

Language assistance that a recipient might provide to LEP persons includes, but is not limited to:

1. Oral interpretation services;
2. Bilingual staff;
3. Telephone service lines interpreter;
4. Written translation services;
5. Notices to staff and recipients of the availability of LEP services; or
6. Referrals to community liaisons proficient in the language of LEP persons.

Language Implementation Plan: After completing the four-factor analysis and deciding what language assistance services are appropriate, a recipient may develop an implementation plan or LAP to address identified needs of the LEP populations it serves. Some elements that may be helpful in designing an LAP include:

1. Identifying LEP persons who need language assistance and the specific language assistance that is needed;
2. Identifying the points and types of contact the agency and staff may have with LEP persons;
3. Identifying ways in which language assistance will be provided;
4. Outreaching effectively to the LEP community;
5. Determining which documents and informational materials are vital;
6. Translating informational materials in identified language(s) that detail services available to beneficiaries;

Notification of LEP persons: Once a local government has decided, based on the four factors, that it will provide language services, it is important for the recipient to let LEP persons know that those services are available and that they are free of charge. All costs associated with providing translation services are an eligible, reimbursable CDBG cost. Recipients should provide this notice in a language that LEP persons will understand. Examples of notification that recipients should consider include:

1. Posting signs in common areas, offices, and anywhere applications are taken. When language assistance is needed to ensure meaningful access to information and services, it is important to provide notice in appropriate languages in initial points of contact so that LEP persons can learn how to access those language services. This is particularly true in geographic areas with high volumes of LEP persons seeking access to the recipient's major programs. For instance, signs in offices where applications are taken could state that free language assistance is available. The signs should be translated into the most common languages encountered. They should explain how to get the language help.
2. Stating in outreach documents that language services are available from the recipient. Announcements could be in, for instance, brochures, booklets, and in outreach and application information. These statements should be translated into the most common languages and could be "tagged" onto the front of common documents.
3. Working with grassroots and faith-based community organizations and other stakeholders to inform LEP individuals of the recipients' services, including the availability of language assistance services.

4. Providing notices on non-English language radio and television stations about the available programs and how to access them.

Iowa Statistics: U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates.

- Percentage of Iowans who speak a language other than English at home, percent of persons age 5 years or older from 2014-2018: 8%
- Language spoken at home in 2017 for the state:
 - English only: 91.9%
 - Spanish: 3.9%

To find out about your community: <https://www.census.gov/quickfacts/IA> or <https://www.iowadatatcenter.org/>

Language Spoken at Home by the Ability to Speak English
(5-year period estimates)

Universe: Population 5 years and over

Geographic name	Language spoken at home	2014-2018			
		Speak English "very well"		Speak English less than "very well"	
		Estimate	Margin of error	Estimate	Margin of error
Fremont County	Spanish	115.0	(+/-)46	24.0	(+/-)20
	Korean	0.0	(+/-)13	0.0	(+/-)13
	Chinese (incl. Mandarin, Cantonese)	0.0	(+/-)13	0.0	(+/-)13
	Vietnamese	0.0	(+/-)13	0.0	(+/-)13
	Arabic	0.0	(+/-)13	0.0	(+/-)13
Harrison County	Spanish	42.0	(+/-)23	28.0	(+/-)23
	Korean	3.0	(+/-)6	0.0	(+/-)15
	Chinese (incl. Mandarin, Cantonese)	14.0	(+/-)19	0.0	(+/-)15
	Vietnamese	6.0	(+/-)7	0.0	(+/-)15
	Arabic	3.0	(+/-)7	0.0	(+/-)15
Mills County	Spanish	136.0	(+/-)65	96.0	(+/-)52
	Korean	0.0	(+/-)15	0.0	(+/-)15
	Chinese (incl. Mandarin, Cantonese)	0.0	(+/-)15	0.0	(+/-)15
	Vietnamese	0.0	(+/-)15	0.0	(+/-)15
	Arabic	0.0	(+/-)15	0.0	(+/-)15

Language Spoken at Home by the Ability to Speak English
(5-year period estimates)

Universe: Population 5 years and over

Geographic name	Language spoken at home	2014-2018			
		Speak English "very well"		Speak English less than "very well"	
		Estimate	Margin of error	Estimate	Margin of error
Iowa	Spanish	69,829	(+/-)1,879	48,880	(+/-)1,536
	Korean	1,507	(+/-)361	1,352	(+/-)299
	Chinese (incl. Mandarin, Cantonese)	4,938	(+/-)624	7,325	(+/-)983
	Vietnamese	2,955	(+/-)527	5,594	(+/-)814
	Arabic	4,497	(+/-)731	3,489	(+/-)749

The State has used the LEP data provided earlier in this document and determined that LEP the population in the MID counties is below the threshold to trigger translation and posting of documents prior to a specific request for such services. In accordance with the Iowa CDBG Language Access Plan, all individual requests for services will be considered and accommodations provided when reasonable.

Appendix C – Certifications

Certifications Waiver and Alternative Requirements

IEDA has provided to HUD the necessary *Financial Management and Grant Compliance Certification for States and Grantees*. In addition to those executed documents:

24 CFR 91.225 and 91.325 are waived. Each grantee receiving a direct allocation under this notice must make the following certifications with its action plan:

a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.

b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

c. The grantee certifies that the action plan for disaster recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken 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 91.115 or 91.105 (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. State grantee 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:

(1) 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 2019 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

(2) With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.

(4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

(a) Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or

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

i. The grantee certifies that the grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing.

j. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, must certify that they will require local governments that receive grant funds to certify that they have adopted and are enforcing:

(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

(2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

k. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a. under section VI and its Implementation Plan and Capacity Assessment and related submissions to HUD referenced at A.1.b. under section VI.

l. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

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

Debi Durham, Director,
Iowa Economic Development Authority

Appendix D – Public Comment

Public Comment and Response

The Public Comment Period for this Action Plan was May 2, 2020 – June 1, 2020. Comments regarding the CDBG-DR Action Plan were accepted via web email to ann.schmid@iowaeda.com, mailed to the Iowa Economic Development Authority, 1963 Bell Avenue, Suite 200, Des Moines, IA 50315, and collected during the public hearing. All comments and responses are included below.

Action Plan Comment Period:
May 2, 2020 – June 1, 2020
Public Hearing: May 20, 2020

- 1. Q: If a contractor, property owner or city were to develop a subdivision, how much funding would be available for infrastructure (streets, water, sewer) and stormwater management if over 51% of the housing built is for LMI individuals?**

A: Infrastructure in support of housing is eligible for reimbursement through this program under certain circumstances. In order to meet a HUD National Objective, infrastructure must serve at least 51% LMI qualified residents, therefore infrastructure that supports at least 51% of housing units within a single application for funding can be funded based on true cost for infrastructure, as long as no other funds had been previously made available (TIF, Transportation, etc.). Housing must be part of the application, new subdivision infrastructure alone will not meet a National Objective, as no households are served. This program can fund 100% of true costs for infrastructure as long as the 51% housing unit ratio is met. If a subdivision proposes less than 51% LMI housing, then a ratio of eligible infrastructure costs will be established. For example, if a subdivision will be built for 20 home and only 10 will be limited to LMI, then only 50% of the infrastructure costs would be eligible, however if that same subdivision built 11 LMI houses, then 100% of the infrastructure would be eligible.

- 2. Q: Infrastructure Funding - Although the City (Pacific Junction) will be received FEMA public assistance funds to repair or reconstruction flood damaged infrastructure, we anticipate further damage to streets due to traffic generated by the demolition of approximately 150 homes. A vast majority of existing streets are relatively thin chip seal roadways which are not designed for heavy weights or additional traffic. Upon completion of buyouts, some roadways may no longer be needed and potentially demolished. Based on these anticipated needs, we would advocate funding be allocated for street infrastructure in addition to storm water infrastructure.**

A: Based on this comment, the Action Plan has been modified to allow for improvements to existing infrastructure, that was damaged by the disaster and needs repair. In order to utilize

these funds, the infrastructure must service an LMI population of at least 51% Area Benefit. When using CDBG-DR funding as a match to FEMA, or as a stand-alone funding source, all Labor Standards compliance will be triggered for the entire project. FEMA funded projects are exempt from compliance with Davis Bacon prevailing wages, but matching CDBG-DR funds to a FEMA infrastructure project will require Davis Bacon wages on the entire project. This is something to take into consideration before applying for CDBG-DR funding for FEMA match infrastructure projects.

- 3. Q: Commercial Rehabilitation - All of the City's privately owned commercial buildings were damaged in the flood event. These properties are not included in the buyout program. We are concerned these buildings will continue to remain vacant and continue to deteriorate. The City prefers to preserve as many of these commercial structures as possible rather than just demolition. Although the commercial section of the City is not of a significant size, preservation of these structures is important to our sense of community. We request that funding be allocated for commercial rehabilitation of privately owned properties.**

A: The HUD Federal Register Notice 85 FR 4681, which allocated the State of Iowa these CDBG-DR funds, specifically states: "each grantee receiving an allocation for a 2018 or 2019 disaster is required to primarily consider and address its unmet housing recovery needs. These grantees may, however, propose the use of funds for unmet economic revitalization and infrastructure needs unrelated to the grantee's unmet housing needs if the grantee demonstrates in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other sources of funds." As such, the State is required to address all unmet housing needs before any economic development programming is possible. The State has determined a substantial unmet housing need as a result of the number of buyouts associated with this disaster. Commercial Building rehabilitation is only eligible as an economic unmet need, as such the State must first prove that all housing needs are met before offering any economic development programs. The State is able to amend the Action Plan, meaning, if in the future, all housing needs are met, and resources are still available for economic development needs, the State can at that time, offer such a program. Interior and exterior rehabilitation of privately held buildings for commercial purposes would also be tied to job creation to be eligible for CDBG-DR funding. Therefore, in order for the business to be eligible for commercial rehabilitation funds, 51% of the jobs created would be required to be LMI.

- 4. Q: Single Family Rehabilitation/Demolition - Not all residential property owners are participating in the buyout program. These residents have decided to remain and are either repairing their property or rebuilding. The only assistance for these residents has been FEMA assistance previously received. Unfortunately, this assistance is insufficient for the full cost of repairing a flood damaged property. Additionally, some residents would just like assistance to demolish the existing property and replace it with a new structure. We request that funding be allocated for single family rehabilitation and demolition assistance for property owners not participating in the buyout program. Since the City is not located in a 100-year flood plain, we believe this type of investment in the community is appropriate.**

A: Based on this comment, the Action Plan has been modified to allow for a demolition/clearance activity. This would be limited to properties where the owner retained the parcel, and the City documented that the building was impacted by the disaster and is a slum and blight concern based on disaster damage.

The State has thoughtfully considered a rehabilitation program and has determined that meeting federal regulations such as Lead Safe Work requirements, Environmental Regulations, Duplication of Benefits, documentation of cost incurred, etc. overly burden a rehab program and makes it difficult if not impossible to utilize these funds.

5. **Q: New Housing Program - Program guidelines state that “All properties must be located outside of the 100-year floodplain and priority will be given to projects located outside of the 500-year floodplain.” As previously stated, our understanding is the City is not in a 100-year floodplain but is located in a 500-year floodplain protected by a levee. Does this mean the new housing construction using CDBG -DR funding is possible in Pacific Junction. We advocate it should be eligible.**

A: The State has worked very closely with FEMA and the Iowa Department of Natural Resources to consider flood risk associated with the sites for the investment of federal funds in housing. Pacific Junction is currently mapped as 500-year floodplain, and as levee systems and infrastructure improvements are made the flood risk may diminish. The State is working with the Federal Economic Development Administration on a comprehensive land use plan for Mills and Fremont Counties. This plan will assess Missouri River flood risk and make recommendation for resilient flood uses. Based on all of this information, the State will continue to prioritize housing outside of all flood risk and all new housing will be scored and ranked, but, depending on need and demand, construction of new housing in the 500-year floodplain may be awarded. Certain mitigation requirements such as obtaining and maintaining flood insurance, or elevation of mechanical systems may be required for such new construction. The program guidelines will outline specific requirements for construction in the 500-year floodplain.

6. **Q: Approximately 39 properties in rural Pottawattamie County north of Council Bluffs were inundated by the 2011 and 2019 flood events. These properties are vulnerable and unprotected. Pottawattamie County needs funding to supplement the HMGP for these properties.**

A: As noted in the Action Plan, 80% of these CDBG-DR Funds must be spent in the HUD identified MID Counties (Mills, Fremont and Harrison). As Pottawattamie County is not one of the MID Counties, the State is able to expend funds from the remaining 20% for these purposes, however there may be some delay in expending these funds, as the State works to ensure the full 80% will be expended in the MID. The State will work closely with HSEMD on the eligibility and timing of all buyout applications.

7. **Q: If we are planning to build multi-family housing (36-40 units), are we eligible for \$75,000 per unit or is the award based on actual construction costs?**

A: Both. The Project would be eligible for \$75,000 per housing unit generated in the program. In application to IEDA, the project would identify the total number of units to be produced, which would be multiplied by \$75,000 for a total federal award. When drawing down these funds during construction, invoices for the reimbursement of these funds must be substantiated by incurred construction costs associated with the construction of these units. CDBG-DR funds cannot account for 100% of the project funding, and the LMI ratio (number of housing units rented to LMI qualified tenants) may be adjusted to align with the percentage of funding made available to the project, but cannot go below 51% of the units generated in a multi-family housing project.

8. Q: I was told by SWIPCO that the funds we will be reimbursed after completion. In the Draft Action Plan, though, it states the investment award can be drawn down mid-construction (with supporting documentation). Will you please clarify?

A: Yes, construction costs for both housing and infrastructure can be drawn down during construction to assist in the financing of the development of housing units. These draws must be supported with invoices/documentation of costs incurred associated with the construction of these housing units. A retention will be held back until units are sold/leased to LMI qualified occupants to ensure a HUD National Objective is met. Details regarding draw-down and retention will be included in the program guidelines.

9. Q: Is there still additional award money if units are built to "high-performance standards?" (Mentioned in February meeting.)

A: Yes. All housing units produced under this program will be required to meet a minimum standard for housing construction. This checklist will be included in program guidelines and applied to all new housing units. Our team is currently working on a "high-performance" standard that will support resilient construction above and beyond the minimum standard. There will be an opportunity for builders to select that checklist and request additional funding for increased cost of high-performance construction based on the real cost differential between minimum standard and high-performance.

10. Q: I want to clarify that these multi-family apartments will need to be rented to LMI tenants for 20 years. In Feb, I had written down that income & rent limits would fall off within 5-10 years, depending on the size of the project.

A: Yes, this is a change from the February meeting. Since that time, the State has been notified that HUD is regulating rental terms of affordability. As the Iowa CDBG-DR funding is included as a supplemental funding to both existing and new HUD recipients, the guidance on this issue has changed over time. The initial Federal Register notice (83 FR 5844) mandated 20-year term of affordability for all rental projects. A subsequent notice (83 FR 40314) modified that requirement to "New construction multi-family rental projects with five or more units ... 20 years." As such the State is limited by these requirements and must impose them on all projects funding with these funds.

11. Q: Is the developer able to sell their (rental) property that was constructed using these funds, say, after 5-10 years? If so, are there any restrictions, will money need to be paid back, etc.?

A: Yes, the sale or transfer of ownership is allowed during the Term of Affordability, as long as there is a written agreement from the new owner to maintain the covenants and restrictions associated with the Term of Affordability. If the new owner does not want to comply, 100% of the invested federal funds will be due back to the state at the time of noncompliance.

12. Q: Why not Pottawattamie County and Council Bluffs?

A: The Most Impacted and Distressed (MID) Counties are determined by HUD and included in the Federal Register Notice and Award of CDBG-DR funding. HUD selects MID locations based on FEMA damage assessments and the State is not included in that initial determination. As the State requested an expansion of the MID to include Harrison County, an assessment of “substantially damaged” houses in ratio to total houses was used as the justification. While Council Bluffs and Pottawattamie County suffered damage during the 2019 flooding event, the more densely populated total housing units, resulted in a lower percentage of substantially damaged houses compared to total housing units.

13. Q: Are the buyouts for owner-occupied only? Or is that up the city/county?

A: Because CDBG-DR funding comes later in the disaster recovery process, the State has determined to mirror the FEMA eligibility criteria for buyouts. As such, FEMA eligibility will apply to these funds. FEMA allows for non-owner-occupied buyouts and that is included in the City/County Administrative Plan for buyout.

14. Q: How is CDBG going to look at the City of Pacific Junction? We are in a 500 yr flood zone and but have the highest LMI %. Flood Recovery Funds allowed us a little over \$3,000,000 to buy out homes and keep the land. We have a need to plan and develop on this land...How are you looking at us.

A: According to the Action Plan, Pacific Junction is eligible for buyout match funding, infrastructure funding (see answer # 2), storm water management funding, and potentially housing funding (see answer #5). The State is working diligently to provide resources where needed, but protecting federal investment from future flood risk, and ensuring that the LMI population is protected from both flooding risk and increased costs of living associated with flood insurance requirements. Additional planning is ongoing and will help inform how/where funding can best serve Pacific Junction.

15. Q: How long does the developer have to own their rental project

A: There is no requirement to hold rental property after completion, but the covenants and restrictions will remain on the land for the Term of Affordability, so any transfer or sale will require the assumption of the Covenants and restrictions by the new owner. (Also see question #11).

16. Q: The funding is mainly geared towards a developer incentive. Would a household be able to hire a contractor and build their own house? I have received this question.

A: This would only be available to an LMI qualified household. They would be able to submit a single house application that named the qualified buyer, housing builder, and identified the lot for construction. It would work the same as above but act as a single house application.

17. Q: How many participants joined this forum today?

A: During the virtual public hearing held on May 20, 2020, the State was aware of 29 active participants. After downloading the participant report, the system indicated that 49 separate entities “joined” the meeting during the duration of the Public Hearing.

18. Q: Will HUD consider grouping LMI income limits like USDA does?

A: HUD has not made this change at this time. It would require a nation-wide consistent change of HUD programs. The State has asked this question and been told it is not currently under consideration by HUD.

19. Q: Will the sale of houses require an Abstract, or can Title Insurance be sufficient?

A: In 1947, the Iowa General Assembly enacted Iowa Code §515.48(10) prohibiting the sale of title insurance in Iowa. The Iowa Supreme Court upheld the prohibition in 1977 in Chicago Title Insurance Company v. Huff, 256 N.W. 2d 17 (Iowa 1977). Further, Iowa Code §535.8(4)(b)(1) prohibits lenders from charging a borrower for a title insurance fee or premium. The State of Iowa has established a clear title requirement through the use of an abstract pursuant to the Marketable Record Title provisions at Iowa Code section 614.29 et seq., Iowa Code section 16.90 et seq., and the Iowa Administrative Code, 265 IAC Chapter 9.

20. Q: Does the State offer any lending programs that could work in conjunction with this housing program?

A: The Iowa Finance Authority (IFA) does offer many lending tools for home buyers. Persons who would qualify for the purchase of a home under the CDBG-DR income limits who are interested in purchasing one of these CDBG-DR funded properties should contract a local participating lender to see if there are programs available to assist. IFA has a search tool to help identify local lenders who participate in and offer IFA lending tools:

<https://www.iowafinance.com/find-lender-realtor/>

Appendix E – MID County Expansion Request and Response

IOWA ECONOMIC DEVELOPMENT AUTHORITY
1900 Bell Avenue, Suite 200 | Des Moines, Iowa, 50315 USA | Phone: 515.348.8200
iowaeda.com



January 13, 2020

The Honorable Benjamin S. Carson, Sr. M. D.
Secretary
Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410

RE: CDBG-DR Supplemental for DR-4421 Most Impacted and Distressed (MID) Areas

Dear Secretary Carson:

The State of Iowa has received the Explanation of Funding Allocation under Public Law 115-254 and 116-20 dated December 3, 2019. The State of Iowa is grateful for the thoughtful allocation of funds and is actively planning programs to best meet the remaining unmet needs of our most vulnerable disaster affected population.

The devastating spring 2019 Iowa flooding was severe and prolonged throughout the Missouri River Valley in Southwest Iowa. The State agrees with HUD's analysis of the most impacted and distressed areas, in terms of disaster impact; however, these areas of significant impact remain at risk to future flooding as a result of numerous levee breaches. While efforts will be made to harden infrastructure, the State believes it is imperative to offer communities redevelopment opportunities outside of inundation areas and at-risk flood plains. As such, IEDA requests that HUD reconsider the designated MID areas to include, in addition to Mills County (already a MID), all of Fremont County, and the Harrison County zip code of 51555. By expanding the MID to the full counties of southwest Iowa most impacted by the disaster event, and an impacted community with safe, dry land to expand to, the State can encourage redevelopment outside of the at-risk areas, while allowing residents to remain within their county of residence.

Please see attached maps of current and proposed expanded MID areas. The goal is to relocate clean, quality, affordable housing adjacent to, but outside of at-risk flood inundation areas.

Sincerely,

Debi V. Durham
Director
Iowa Economic Development Authority
Iowa Finance Authority

cc. Phyliss Foulds, CPD Specialist, HUD

HUD MID's as noted in the Explanation of Funding Allocation under Public Law 115-254 and 116-20 dated December 3, 2019.



Mills County, IA



Zip Code 54640, Fremont County

State of Iowa's Proposed MID's



Mills County, IA



Fremont County, IA (this includes 51640 but expands to allow the entire county as a MID)



Zip Code 51555 Harrison County, Missouri Valley is the only municipality outside of Mills and Fremont Counties to have a significant number of FEMA Verified Losses, and a total FVL per population of over 3%. Expanding the MID to include Missouri Valley will allow redeveloped opportunities outside of the at-risk flood plain.

June 1, 2020



ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

Ms. Debi Durham
Director
Iowa Economic Development Authority
1963 Bell Avenue, Suite 200
Des Moines, IA 50315

Dear Ms. Durham:

Thank you for your letter of January 13, 2020, regarding the Iowa Economic Development Authority's (IEDA) request to expand the area designated by the Department as Most Impacted and Distressed (MID) for the State of Iowa's 2019 Community Development Block Grant Disaster Recovery (CDBG-DR) allocation. Your letter requests the inclusion of all of Fremont County and ZIP Code 51555 in Harrison County, as those areas have demonstrated significant unmet needs as a result of the flooding events of 2019.

In accordance with the *Federal Register* Notice issued January 27, 2020, (85 FR 4681) no less than 80 percent (\$77,393,000) of the State's 2019 grant award must be expended for recovery in the HUD-identified MID areas. The Notice defined the MID area for this award as all of Mills County, and the 51640 ZIP Code within Fremont County. Your request to expand the MID area is supported by FEMA Verified Loss (FVL) data. According to that data, Missouri Valley (served by ZIP Code 51555) is the only municipality outside of Mills and Fremont Counties to have a significant number of FVL and an FVL damage rate over 3 percent per capita. Based on the significant FVL, the Department finds that good cause exists to expand its defined MID area to include the area within Harrison County that is within the 51555 ZIP Code.

The Notice (85 FR 4681) further states that "...if HUD designates a ZIP Code for 2018 and 2019 disasters as a most-impacted and distressed area for purposes of allocation funds, the grantee may expand program operations to the whole county (county is indicated in parentheses next to the ZIP Code) as a most impacted and distressed area." Based on this provision and the Department's approval of the additional ZIP Code in Harrison County, IEDA may expand the MID area for this grant award to include the entire area of all three named counties (Mills County, Fremont County, and Harrison County).

The Department has the authority to waive regulatory requirements as established in 24 CFR 5.110. This request, however, is not a waiver of a regulatory requirement and therefore will not be published in a subsequent *Federal Register* Notice. Please be further advised that all other programmatic requirements, including but not limited to corresponding Action Plan amendments, remain the responsibility of the IEDA.

www.hud.gov

espanol.hud.gov

If you have any questions, please contact Tennille S. Parker, Director, Disaster Recovery and Special Issues Division by email at Tennille.S.Parker@hud.gov.

Sincerely,



Digitally signed
by JOHN GIBBS
Date: 2020.05.29
16:36:14 -04'00'

John Gibbs
Assistant Secretary (Acting)

Appendix F – Amendments

State of Iowa – Action Plan, Amendment #1 Non-Substantial

As the State staff have been finalizing our program guidelines and started to populate DRGR with Eligible Activities and National Objectives, the State of Iowa realized that as proposed, some activities would not meet a National Objective on their own, as such some activities need to be separated and others merged to better align with HUD eligible Activities and National Objectives.

The Method of Distribution as stated in the July 2020 Action Plan, approved by HUD on August 7, 2020 is as follows (note a rounding error resulted in the actual total of the funding by activity to be over the allocation by two dollars):

Proposed Program Budget Summary

Program	Funding by Program	%	Activity	Funding by Activity
Housing	\$72,555,750	75%	Buyout – FEMA Match (35%)	\$25,394,513
			Buyout – All CDBG (14.862%)	\$10,783,236
			Demolition / Clearance (.138%)	\$100,127
			Developer Housing Incentive (33%)	\$23,943,398
			Infrastructure in Support of Housing (14%)	\$10,157,805
			Down Payment Assistance (3%)	\$2,176,673
Infrastructure	\$19,154,718	19.8%	CDBG-DR Stormwater Infrastructure	\$19,154,718
Planning	\$193,482	0.20%	Land use planning	\$193,482
Admin	\$4,837,050	5%	IEDA Staff, Recipient Grant Administration, and Professional Services Contracts to assist with grant administration.	\$4,837,050
	\$96,741,000	100%	Total Funds Allocated	\$96,741,000

We will split this between rental and single family

We will merge this into the Single Family New Construction

Due to rounding errors, the activities on this table sum to \$96,741,002 (this will be corrected with this amendment)

After further consideration it seems that in order for the Housing Incentive for the construction of new Single Family Housing to be funded as an eligible activity, it needs to be combined with Down Payment Assistance to ensure that an LMI buyer is the beneficiary of the new housing. As such the State of Iowa proposes the following modification the Action Plan: Split the “Developer Housing Incentive” into “Construction of New Housing with Down payment Assistance” and “Construction of Rental Housing.” This also requires merging “Down Payment Assistance into Construction of New Housing for Single Family housing. Furthermore, the rounding error above is corrected in these final numbers, maintaining the original *Funding by Program* numbers but correcting the *Funding by Activity* numbers. The changed rows are marked with arrows below:

Program	Funding by Program	%	Activity	Funding by Activity	Activity Type DRGR	National Objective
Housing	\$72,555,750	75%	Buyout – FEMA Match (35%)	\$25,394,513	Buyout of Residential Properties	LMI & LPI
			Buyout – All CDBG (14.862%)	\$10,783,236	Buyout of Residential Properties	LMI & LPI
			Demolition / Clearance (.138%)	\$100,127	Clearance and Demolition?	SO
			Infrastructure in Support of Housing (14%)	\$10,157,805	Construction/Reconstruction of streets	LMI
			Construction of New Housing with Down payment Assistance for Homeowners	\$15,000,000	Construction of new housing	LMI
			Construction of Rental Housing	\$11,140,000	Affordable Rental Housing	LMI
Infrastructure	\$19,154,718	19.8%	CDBG-DR Stormwater Infrastructure	\$19,154,718	Rehabilitation/Restoration of public improvements?	LMI
Planning	\$193,482	0.20%	Land use planning	\$193,482	Planning	
Admin	\$4,837,050	5%	IEDA Staff, Recipient Grant Administration, and Professional Services Contracts to assist with grant administration.	\$4,837,050	Administration	
	\$96,741,000	100%	Total Funds Allocated	\$96,741,000		

IEDA considers this change non-substantial as the State will still be offering the same programs described in the Action Plan, there is no change in beneficiaries, and all changes in funding are within the Housing Program, therefore there is no trigger of the definition of Substantial Amendment in the Action Plan. Please review these changes and the State will incorporate them into our Published Action Plan prior to making awards for funding.

RE: State of Iowa Action Plan Amendment #1 (Follow-up)



Burgess, Adriane T <Adriane.T.Burgess@hud.gov>

To: Ann Schmid; Foulds, Phyllis J; Wilkerson, Jo A; Forsyth, Chad R; Disaster_Recovery
Cc: Steven Stransky; Makaria Kirianov

Tue 12/15/2020 6:34 PM

Reply Reply All Forward

This message was sent with High importance.



Good afternoon Ann,

The Department has received and reviewed the State of Iowa's Non-substantial Action Plan Amendment (APA) #1 for the 2019 CDBG-DR grant. As previously discussed with the State, the final review of this amendment was pending execution of the grant agreement. As noted below, Non-substantial APA #1 reallocates funds from multiple activities within the overall Housing program. The State also identified a miscalculation in the Proposed Program Budget Summary (table). Due to rounding errors, the sum of the program activities slightly exceeds the grant award, however, these errors will be corrected with this amendment and incorporated within the Master Action Plan (which is posted online). These proposed budget reallocations include the following:

1. Split of Developer Housing Incentives program budget of \$23,943,398 between Rental and Single-family Housing activities
2. Merger of Down Payment Assistance program budget of \$2,176,673 into Single-family New Construction Housing activity

This amendment is considered non-substantial in accordance with the requirements of the State's Action Plan. It does not change any of the original activities' planned benefit or eligibility criteria, or exceed the budget reallocation limit, thus it does not meet the threshold of a Substantial Amendment. This amendment's reallocation is limited to the Housing program within the State's Action Plan.

This email serves as HUD's acknowledgement of Non-substantial APA #1.

Thank you,

Adriane T. Burgess

Community Planning & Development (CPD) Specialist
U.S. Department of Housing and Urban Development
Office of Block Grant Assistance (OGBA)
Disaster Recovery and Special Issues (DRSI) Division
500 Poydras Street, 9th Floor
New Orleans, Louisiana 70130

Adriane.T.Burgess@hud.gov

Phone: (504) 671-3786

Mobile: (202) 763-3295

Fax: (504) 671-3019

State of Iowa – Action Plan, Amendment #2 Substantial

The State of Iowa has reviewed the 2019 CDBG-DR Action Plan and determined that based on demonstrated need through the submittal of applications to IEDA from eligible applicants for the available funding programs, the State must Substantially Amend the Action Plan in order to make awards to projects. The State has had all Action Plan programs open for one year, and based on requests and project needs, the State is proposing the following Substantial Amendment to the 2019 CDBG-DR Action Plan.

This Substantial Amendment will do the following:

- Reduce funding to \$0 and eliminate the CDBG-DR Funded Buyout Program,
- Reduce funding to \$0 and eliminate the CDBG-DR Demolition & Clearance Program,
- Reduce funding by \$17,639,886 for the FEMA Match Buyout Program,
- Reduce funding by \$1,349,934 for the Construction of Rental Housing,
- Reduce funding by \$16,462,414 for Stormwater Infrastructure,
- Reallocate \$30,135,444 to the activity of Public Infrastructure in Support of Housing,
- Reallocate \$15,759,822 to the activity of Construction of New Housing with Down payment Assistance for Homeowners,
- Reallocate \$516,774 to Planning,
- Reduce Admin fund by \$76,443.

This Substantial Amendment to eliminate programs and reallocate funds to programs with demonstrated need could result in the State's ability to fully obligate the remaining CDBG-DR funds.

As noted in the published Action Plan for 2019 CDBG-DR programs, a Substantial Amendment occurs when the State adds or deletes activities and when the State reallocates funding to programs in excess of five million dollars, as such these changes are considered Substantial and require the State to make this proposed amendment open for public comment.

The State is making this Substantial Amendment available to the public for comment between December 30, 2021 and January 30, 2022. Comments can be made by emailing Disaster@IowaEDA.com

The following table outlines all proposed changes and the revised budgets based on this Substantial Amendment:

Program	Funding by Program	%	Activity	Funding by Activity	Awarded to-date	Pending Award	Balance	Proposed Action Plan Amendment #2	Revised Action Plan
Housing	\$72,555,750	75%							
			Buyout – FEMA Match	\$25,394,513	\$7,690,216	\$64,411	\$17,639,886	-\$17,639,886	\$7,754,627
			Buyout – CDBG funded	\$10,783,236			\$10,783,236	-\$10,783,236	\$0
			Demolition / Clearance	\$100,127			\$100,127	-\$100,127	\$0
			Infrastructure in Support of Housing	\$10,157,805		\$40,293,249	-\$30,135,444	+\$30,135,444	\$40,293,249
			Construction of New Housing with Down Payment Assistance for Homeowners	\$15,000,000	\$121,250	\$30,638,572	-\$15,759,822	+\$15,759,822	\$30,759,822
			Construction of Rental Housing	\$11,120,069	\$9,610,135	\$160,000	\$1,349,934	-\$1,349,934	\$9,770,135
Infrastructure	\$19,154,718	19.8%	CDBG-DR Stormwater Infrastructure	\$19,154,718	\$2,692,304		\$16,462,414	-\$16,462,414	\$2,692,304
Planning	\$193,482	0.20%	Land use planning	\$193,482	\$40,000	\$670,256	-\$516,774	+516,774	\$710,256
Admin	\$4,837,050	5%	IEDA Staff, Recipient Grant Administration, and Professional Services Contracts to assist with grant administration.	\$4,837,050	\$213,296 (TA) \$4,547,311 (State)		\$76,443	-\$76,443	\$4,760,607
	\$96,741,000	100%	Total Funds Allocated	\$96,741,000					\$96,741,000



IOWA ECONOMIC DEV. AUTHORITY
1963 BELL AVE STE 200

DES MOINES IA 503151000

of Affidavits 1

This is not an invoice

AFFIDAVIT OF PUBLICATION

State of Wisconsin

County of Brown, ss.:

The undersigned, being first duly sworn on oath, states that The Des Moines Register and Tribune Company, a corporation duly organized and existing under the laws of the State of Iowa, with its principal place of business in Des Moines, Iowa, the publisher of

THE DES MOINES REGISTER

newspaper of general circulation printed and published in the City of Des Moines, Polk County, Iowa, and that an advertisement, a printed copy of which is attached as Exhibit "A" and made part of this affidavit, was printed and published in The Des Moines Register in the editions dated

Ad No.	Start Date	Editions Dated	Cost:
0005064131	12/30/21	12/30/2021	\$38.42

Copy of Advertisement
Exhibit "A"

Denise Roberts

Staff member, Register Media

Subscribed and sworn to before me by said affiant this

30 day of December, 2021

Kathleen Allen

Notary Public

1-7-25

Commission expires

KATHLEEN ALLEN
Notary Public
State of Wisconsin

State of Iowa
2014 Community Development
Block Grant Disaster Recovery
(CDBG-DR)
Substantial Amendment to the
State's Action Plan
Notice of Availability

The Iowa Economic Development Authority (IEDA) announces the availability of a Substantial Amendment to the State's Community Development Block Grant Disaster Recovery Action Plan. Based on funding requests submitted to the State, the Action Plan must be adjusted to make awards as the adjustment exceeds \$1million, and therefore is considered a Substantial Amendment. The Action Plan and the enclosed Amendment detail how the Iowa Economic Development Authority (IEDA) plans to expend the CDBG-DR allocation Supplemental Appropriations for Disaster Relief Act (P.L. 114-201) passed by congress which allocated \$8,741,000 to the state of Iowa for purpose of assisting in long term recovery from the major flooding disaster that took place in the Spring of 2015.

The notice is anticipated to comment through 11:59 p.m. on Sunday, January 30, 2017. The report may be obtained by viewing the file named "State of Iowa 2017 CDBG-DR Amendment #2" located under the Resources section of the disaster web page. <http://www.iowadca.com/disaster-recovery2017/> and comments are accepted by emailing disaster@iowadca.com or by contacting Steven Strasky, Disaster Recovery Project Manager, IEDA, 1943 Bell Ave, Des Moines, 50315 or by e-mail of Steven.Strasky@iowadca.com or phone 515 348 6504.

Public Comment and Response:

The public comment period for Amendment 2 was from December 30, 2021 through January 30, 2022. Comments regarding the CDBG-DR Action Plan were accepted via web email to Steven.Stransky@IowaEDA.com and Disaster@IowaEDA.com.

The State received public comment. The comments and response are as follows.



January 4, 2022

Ms. Debi Durham, Director
Iowa Economic Development Authority
1963 Bell Avenue, Suite 200
Des Moines, Iowa 50315

RE: Public Comment to Substantial Amendment #2 to the Community Development Block Grant Disaster Recovery (CDBG-DR) Program for Flood Recovery

Dear Ms. Durham:

The City of Council Bluffs wishes to respond to the request for public comment for the substantial amendment to the Community Development Block Grant Disaster Recovery (CDBG-DR) Program. I strongly encourage you reconsider the amendment reallocating all funding from the "Buyout CDBG-DR Only" activity to new housing construction.

The 2019 Missouri River flood greatly impacted the adjacent communities. The City of Council Bluffs was no exception. A disaster declaration was made by President Trump for Pottawattamie County on March 23, 2019. Pottawattamie County was one of nine counties eligible for individual assistance. Levee breaches occurred around Council Bluffs, but the city's extensive investment in flood risk reduction prevented a catastrophic flood event. The city went to extremes to keep water out of populated areas including operating large pumps along the river to push water back into the "wet side" of the levee.

The Missouri River in the area of Council Bluffs crested three times from March to September 2019 with levels of 34.40 feet (3-17-2019), 31.96 feet (6-5-2019) and 30.58 feet (9-22-2019). All three crests are within the top six historic crests for the Missouri River and are at or above moderate flood stage. A previous historic crest in 2011 reached 36.29 feet is the second highest recorded level at the gauge location.

Despite the risk reduction provided by the City's levee system, inundation from ground water penetrated homes and damaged properties. The City was proactive and encouraged residents to disconnect sump pumps whenever soils were being pumped with the water. By allowing basements to fill with water, the structures were saved from a full collapse. However, because our levees held and inundation occurred on the "dry side" of the levee, the city was not eligible for FEMA assistance to buy out damaged and threatened homes. The Iowa Flood Mitigation Board awarded Council Bluffs \$342,000 to buy out three homes with foundation collapses but no other assistance was received.

During 2019 and 2020, City Staff met with IEDA Staff to discuss assistance from the CDBG-DR program to complete a \$10 million buyout program that would create resiliency in the city's stormwater system. The City proposed the creation of a large storm water detention area that consistency floods during sustained rains and a buffer around the levee for maintenance and easier access. The City requested IEDA approach HUD and requested Pottawattamie County be added as a Most Impacted and Distressed (MID) counties but the request was denied by HUD.

City of Council Bluffs Municipal Government
209 Pearl Street, Council Bluffs, IA 51503
councilbluffs-ia.gov | 712-890-5100
"An Equal Opportunity Employer"

The activity, "Buyout CDBG-DR Only" on page 41 of the Action Plan states:

In very few circumstances, HMGP funds may not be available to municipalities because properties impacted by the disaster event are outside of the 100-year floodplain and/or FEMA's best available data, and any levee or existing mitigation remained undamaged and/or certified for protection from flooding events. In some cases, ground water back-up caused wide-spread damage to LMI residential areas and continues to pose risk to these neighborhoods.

The City of Council Bluffs is one of a few, possibly the only, community that meets this criterion because our inundation was on the "dry side" of the levee making us ineligible for FEMA funding. This week we were informed the funding was being reprogrammed, "After seeing a strong demand for new housing for low-to-moderate income households across communities the MID counties, IEDA leadership decided it would be best to dedicate the remaining funding to new housing construction in the MID area."

The \$10,783,236 designated to this activity is only 11.14% of the total program funding (\$96,741,000) but it could have the greatest impact on Southwest Iowa when another large-scale flood occurs. Removal of the "Buyout CDBG-DR Only" means the City of Council Bluffs cannot access CDBG-DR funds and create additional stormwater detention and a levee maintenance buffer.

With a population of 62,355, Council Bluffs is the largest city and the largest employment center for Southwest Iowa. Over 21 square miles of the city's 45.5 square miles is FEMA designated "X-protected by levee." This represents approximately 720 commercial and public properties, 700 industrial properties and 12,000 residential structures. The residential area houses approximately 35,500 citizens of which 57.19% are considered low-to-moderate income households according to HUD.

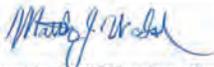
A buyout program is not something we take lightly. During the 2019 disaster, the availability of affordable housing began to shrink after many households relocating from surrounding small communities moved from their own flooded properties. The current housing market has ballooned that finding a quality, affordable housing unit is substantially harder than ever before. As of today there are only 29 units on the market between for under \$250,000. We understand removing the proposed units will potentially exacerbate the problem of finding affordable housing. However, the need for long-term sustainability of the city's stormwater system is paramount to the safety and vitality of Council Bluffs.

Again, I request you reconsider your decision to reallocate all funding from the "Buyout CDBG-DR Only" and give Council Bluffs the opportunity to request assistance for its stormwater buyout program to create additional stormwater capacity and a buffer around the Missouri River levee. These funds are essential to the City's long-term goals for flood sustainability, mitigation and continued resiliency.

Thank you for your consideration. Please feel free to contact me with any questions you may have regarding this request.

Sincerely,

Matthew J. Walsh, Mayor



CC: Tim Severin, CPD Director, Omaha Office

A:

When considering Amendment 2 to the Action Plan, the State considered additional interest in buyout funds and the additional need for new housing in the MID area. Regarding the FEMA Match Buyout Program, all eligible entities had been contacted and all but one of the eligible entities submitted applications.

Regarding the CDBG-DR Only Buyout Program that is the subject to this public comment, this program had not yet been launched. The State's priority was seeing through the FEMA Match Buyout Program before opening this program up for applications. Under the Program Guidelines published in December 2020, this program would have accepted applicants only from the MID counties (Harrison, Mills, and Fremont) for 2021 and the State would, in one year's time, reassess county eligibility for 2022 and further years based on funding projections and expenditures in the MID area.

While considering amending the action plan, the State reviewed funding projections and expenditures in the MID area and determined that remaining funds would better meet unmet needs in the MID area if they were programmed to support the construction of new housing for LMI households rather than launch new buyout programs.

With Amendment 2, the 2019 CDBG-DR program funds would support the construction of 253 new LMI housing units in the MID area if all approved and submitted applications are fully completed. This would come close to replacing the 262 housing units in the MID area that have been awarded buyout funds through the FEMA Match Buyout Program. Without Amendment 2, the imbalance between units lost and units gained in the MID area through disaster recovery efforts would significantly increase as fewer new housing units could be awarded without the reprogrammed funds.

The MID area consists of rural communities with considerably fewer financial resources and economic growth than the City of Council Bluffs. Without the incentives of the 2019 CDBG-DR housing programs, it is unlikely that the small towns in the MID area could support constructing enough housing units to replace the units lost to buyouts. Provided the pandemic-driven surge in the cost of building materials, it is unlikely that new housing units constructed in the MID area would be affordable to LMI renters and LMI buyers as housing units constructed under the 2019 CDBG-DR programs are required to be. It was with this in mind that the State determined that Amendment 2 should direct funds to support the construction of new housing in the MID area rather than support FEMA ineligible buyout programs inside and outside of the MID area.



January 28, 2022

Debi Durham
Iowa Department of Economic Development
1963 Bell Avenue, Suite 200
Des Moines, Iowa 50315

RE: Proposed Amendment No. 2 to the 2019 CDBG-DR Action Plan

Dear Ms. Durham:

The Metropolitan Area Planning Agency submits this letter on behalf of several communities within our region regarding the above referenced amendment. These include the City of Council Bluffs, City of Pacific Junction and Pottawattamie County.

Council Bluffs

We object to reducing funding to \$0 for the CDBG-DR funded buyout program. We understand that the City of Council Bluffs was planning to apply for \$10,783,236 to undertake a buyout effort near the I-29 and I-80 interchange. Although the City has a robust levee system which protects against severe flooding, the City's storm water system discharges into the Missouri River. During high water events, the water table is elevated and storm water discharge is significantly reduced. As such, any snowmelt or rainfall isn't absorbed and the storm water system becomes over capacitated resulting in flooding in lower areas along the levee system. An additional side effect of a prolonged water table is basement flooding. Although many home basement drainage and pump systems, homes in close proximity to the levee can pump soil material with the water which can result in erosion of soil under the structure and in some cases near and under the levee itself. The City is then faced with ordering homes to stop pumping which results in basement flooding and in some instances basement collapse. To protect the levee system, homes near the levee need to be acquired and removed to eliminate future flooding and property damage, protect the levee from erosion, and to provide emergency access to repair breaches in the levee if they were to occur.

Pottawattamie County

We object to reducing funding by \$17,639,886 for the FEMA Match Buyout Program. Specifically, the County has been tentatively notified by HSEMD that it will receive \$1,430,066.25 in HMGP funds for Phase II acquisition and demolition of flood damaged properties. The County planned to receive an additional \$476,688.75 in CDBG-DR funds to cover the 25% match requirement for Phase II. To our knowledge CDBG-DR funds were awarded to all previous HMGP buyout projects in Fremont, Mills, and Pottawattamie Counties. Although the County had requested HMGP funds previously and HSEMD has provided tentative approval, final approval by the FEMA is pending. In anticipation of this award, the County was working on

making an application for CDBG-DR funds prior to the November 15, 2021 deadline for Phase II buyouts, but IDEA informed all funds were committed and the County could not apply.

Secondly, two buyout projects were previously funded in Pottawattamie County. These include \$98,536 for buyouts in the City of Oakland and \$500,324 for Phase I buyouts in Pottawattamie County. Together, these projects total \$598,860 in CDBG-DR funds which represents .52% of the \$96,741,000 awarded to Iowa. Adding Phase II would increase the total to \$1,075,549 or 1.11% of the total awarded. We understand that IDEA can allocate 20% non-mid counties.

Finally, we believe the most resilient objective for flood recovery is the acquisition and demolition of residential structures along the Missouri River that experience repetitive flood events. Not only does this prevent future flood damage, it gives flood victims an opportunity to relocate outside of the floodplain. Based on the buyout funding awarded to date, this opportunity has been granted to other jurisdictions but only partially given to residents of northeast Pottawattamie County. The 2019 flooding impacted the floodplain properties in Fremont, Harrison, Mills and Pottawattamie equally.

Pacific Junction

We object to the reduction of \$16,462,414 for stormwater infrastructure and would advocate IDEA reserve some CDBG-DR funding not only for stormwater infrastructure but other public infrastructure. The basis of our objection is fourfold. First, Pacific Junction is the community hardest hit by the 2019 flood event. The City is receiving HMGP, CDBG, and Iowa FRF funds for property buyouts for approximately 120 homes. Even with assistance from MAPA and multiple subcontractors, the City's staff time is consumed by the buyout project. As such, the City has not had sufficient time to fully evaluate and to take advantage of CDBG infrastructure funds that were previously allocated. Although we anticipate the buyout program will be completed this spring, we ask that time be afforded for Pacific Junction to determine its path forward. Second, the City received FEMA Public Assistance and Iowa FRF funding to repair flood damage to its storm water and street infrastructure. However, initial analysis indicates that the awarded funds will not be sufficient due to cost escalations and damage to the street system as a result of a significant demolition project. Further, no funding was awarded to address the City water and sanitary sewer needs. Finally, IDEA sponsored planning project in Fremont and Mills which the City participated in. Pacific Junction was one of four focus areas of the plan. This project is in the final stages and a plan will be published in the near future. One of the justification of the effort was to identify projects that CDBG-DR funds could be utilized for. If funds for storm water infrastructure are reallocated, there are no dedicated funds available for the implementation of the plan—nullifying the efforts of the community leaders and partners to develop the plan.

Sincerely,



Michael Helgerson
Executive Director

A: Omaha-Council Bluffs Metropolitan Area Planning Agency

When considering Amendment 2 to the Action Plan, the State considered additional interest in buyout funds and the additional need for new housing in the MID area. Regarding the CDBG-DR Only Buyout Program, this program had not yet been launched and made available to Council Bluffs and other entities across the state. The State's priority was seeing through the FEMA Match Buyout Program before opening this program up for applications. Under the Program Guidelines published in December 2020, this program would have accepted applicants only from the MID counties (Harrison, Mills, and Fremont) for 2021 and further years based on funding projections and expenditures from the MID area. When considering amending the action plan, the State reviewed funding projections and expenditures in the MID area and determined that remaining funds would better meet unmet needs in the MID area if they were programmed to support the construction of new housing for LMI households rather than launch the program in 2022 and further reduce the availability of housing without having constructed new housing in the MID area to help substitute the units lost to the buyouts in the MID area.

Regarding the FEMA Match CDBG-DR Buyout Program, the State quickly expanded the program throughout its initial year from initially the MID counties to the counties declared for Individual Assistance outside of the MID area and finally to all of the counties covered by the presidential disaster declaration. The State proactively sought out eligible applicants. All but one of the eligible entities submitted an application, including Pottawattamie County, and all applications were fully awarded ahead of launching this amendment. The State considered additional interest in the buyout program when developing this amendment and reviewing public comments but determined that the need for new LMI housing in the MID area to help substitute housing units lost to buyouts outweighed the need for further buyouts outside of the MID area.

Regarding the stormwater infrastructure program, the State opened the program for applications in December 2020 and, while developing this amendment, reached out to both councils of governments conducting project delivery to assess further stormwater infrastructure needs in the MID area. No applications were under development at that time due to the recent awards to local communities from the State's Flood Recovery Fund. The State considered this public comment of retaining unobligated funds for future applications but determined that remaining funds could better meet the unmet need for new LMI housing in the MID area to help substitute units lost to buyouts.

With Amendment 2, the 2019 CDBG-DR program funds would support the construction of 253 new LMI housing units in the MID area if all approved and submitted applications are fully completed. This would come close to replacing the 262 housing units in the MID area that have been awarded buyout funds through the FEMA Match Buyout Program. Without Amendment 2, the imbalance between units lost and units gained in the MID area through disaster recovery efforts would significantly increase as fewer new housing units could be awarded without the reprogrammed funds. The MID area consists of rural communities with considerably fewer financial resources and economic growth than the City of Council Bluffs and Pottawattamie County experience. Without the incentives of the 2019 CDBG-DR new housing programs, it is unlikely that small towns in the MID area could support constructing enough housing units to replace the units lost to buyouts. Provided the pandemic-driven surge in the cost of building materials, it is unlikely that new housing units constructed in the MID area would be affordable to LMI renters and LMI buyers as housing units constructed under 2019 CDBG-DR programs are required to be. It was with this in mind that the State determined that Amendment 2 should direct funds to support the construction of new housing in the MID area rather than support further stormwater infrastructure projects within the MID area and further buyouts outside of the MID area.

Steven Stransky

From: Larry Winum <lwinum@glenwoodstatebank.com>
Sent: Tuesday, January 25, 2022 18:53
To: Steven Stransky
Cc: Alexis Fleener; Brian Kissel (cityadmin@cityofglenwood.org); 'cityclerk@cityofglenwood.org'; Marco Floreani; Kate McGann; malvernclerk@malverniowa.org; cityclerk@cityoftabor.org
Subject: 2019 CDBG-DR Amendment 2 Open for Public Comment

Hi Steven,

I just wanted to respond to your email below.

As you know the flood of 2019 pretty much destroyed the community of Pacific Junction. Approximately 200 homes were under water for over 2 months, with all the families living in those homes displaced to temporary living arrangements. The CDBG funds that have been made available through IEDA for LMI single and multi-family housing projects in Mills County provide the best possible opportunity for these home owners and families to obtain affordable housing and start over again. It is my understanding that with the proposed CDBG housing projects in Glenwood, Malvern and Tabor, there is the potential to create over 150 units of LMI housing in the form of new single family homes and rental/apartment units. I'm sure I am biased, but I don't believe any County lost more homes in the 2019 flood than Mills County. With 200 homes lost in Pacific Junction, and probably another 50 lost in the County scattered along the Missouri river bottom, the need for these 150 units is more than justified. I would assume IEDA and the State of Iowa would agree, and Mills county is certainly appreciative of these funds being available. Hopefully all the applications that were submitted in the 2nd round from the communities of Malvern, Tabor and Glenwood will be approved. We have developers and builders ready to go to work on these new LMI housing projects. Thank you for your consideration, and if you are in need of additional information, please let me know.

Larry

Larry Winum
Glenwood State Bank
32 N Walnut St
Glenwood, Iowa 51534
712-527-3157
Cell 402-960-5385
NMLS 658325

On Jan 3, 2022, at 8:57 AM, Steven Stransky <Steven.Stransky@iowaeda.com> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you are expecting this message and know the content is safe.

All,

In case you missed it, on December 30, 2021, public notice was published in the *Des Moines Register* regarding IEDA re-launching Amendment 2 to the 2019 CDBG-DR Action Plan. This amendment is the

same as the prior amendment, but this public comment period will be 30 days, through January 30, 2021, rather than the 15-day comment period that was mistakenly applied before.

If you provided public comment in the prior round, please resubmit those public comments to me, Steven.Stransky@IowaEDA.com, or to disaster@iowaeda.com by the end of the day on January 30. Feel free to provide any additional comments you may have on the amendment. You can access the amendment at the link here or on our disaster recovery website: [2019-dr-drrg-action-plan-amendment-2.pdf \(iowaeda.com\)](#)

If you have any questions, feel free to contact me. Please share this with anyone else you may wish.

Sincerely,

Steven Stransky, AICP | Disaster Recovery Project Manager
He/him/his



IOWA ECONOMIC DEVELOPMENT AUTHORITY
1963 Bell Avenue Suite 200 | Des Moines, Iowa 50315
PH: 515.348.6204
Steven.Stransky@IowaEDA.com
www.IowaEDA.com

A: Larry Winum, Glenwood State Bank

When considering Amendment 2 to the Action Plan, the State reviewed its funding projections and expenditures in the MID area and determined that remaining grant funds would better meet unmet needs through the construction of new housing for LMI households. Under currently awarded and pending applications, 2019 CDBG-DR funds would support the construction of 253 new LMI housing units in the MID area if all awarded and pending award projects are fully completed. 170 of these new construction LMI units are located in Mills County and are a mixture of rental and single-family owner-occupied units. If all awarded and pending award projects are fully completed, this new construction will nearly replace the approximately 187 units awarded FEMA Match buyout funds in Mills County.

Steven Stransky

From: Larry Winum <lwinum@glenwoodstatebank.com>
Sent: Wednesday, January 26, 2022 16:52
To: Steven Stransky
Cc: Brian Kissel (cityadmin@cityofglenwood.org); Alexis Fleener; Marco Floreani
Subject: RE: City of Glenwood Support of CDBG Funding

Steven,
Please see email public comment from Amber the Glenwood City administrator.
Thanks Amber and have a good night!!

Larry Winum
Glenwood State Bank
32 N Walnut St
Glenwood, Iowa 51534
712-527-3157
Cell 402-960-5385
NMLS 658325

From: Amber Farnan <cityadmin@cityofglenwood.org>
Sent: Wednesday, January 26, 2022 3:50 PM
To: Larry Winum <lwinum@glenwoodstatebank.com>
Subject: City of Glenwood Support of CDBG Funding

CAUTION! - EXTERNAL EMAIL - Do not open attachments or click on links unless you were expecting this email from the sender.

The City of Glenwood supports the recent CDBG funding that has been awarded to our area. Since the flood, it has been evident that we lack affordable housing. This was highlighted even more in the rural housing readiness survey that was recently completed. Recent projects that have been approved for CDBG are bringing much needed affordable apartments and low to moderate income housing.

Amber Farnan
City Administrator/Finance Director
City of Glenwood

A: City of Glenwood

When considering Amendment 2 to the Action Plan, the State reviewed its funding projections and expenditures in the MID area and determined that remaining grant funds would better meet unmet needs through the construction of new housing for LMI households. Amendment 2 to the Action Plan was proposed to help address the need for more affordable housing construction in the MID area. All units constructed with CDBG-DR funds will contain affordability provisions intended to keep rents and sale prices affordable to LMI households. With Amendment 2, the State will be able to award projects proposing to construct approximately 120 rental and single-family owner-occupied units in Glenwood for LMI households. These units will increase affordable housing opportunities in Glenwood.

Steven Stransky

From: Marco Floreani <marco@millscountyiowa.com>
Sent: Thursday, January 27, 2022 08:44
To: Steven Stransky
Subject: Words of Support

Steven,

The Mills County Economic Development Foundation board and our elected officials throughout Mills County are witnessing the benefits from the CDBG Flood Recovery Funds. The program will be assisting in the development of new multi-family and single-family homes throughout the county. In total, there is near 60 new apartment units and 80 new affordable homes coming on the market as a result of the program. The 2019 floods caused significant damage to properties in Mills and the recovery process has not been swift, but the deployment of housing funds injected new life in the communities and sprung local developers to focus on rebuilding affordable housing stock with green infrastructure and clean energy incorporated to the develops – resulting in a more resilient housing stock. The projects will have a profound effect on making housing options available for Mills County residences that have often been left looking for more affordable housing options outside of the county.

The Mills County Economic Development Foundation, along with the Mills County Board of Supervisors believe more funds would be put to use and we appreciate the assistance of our Council of Governments, IEDA, and HUD in assisting Mills County is a stronger future with more diverse housing options.

B afij£ #}£fna i #
2...nj · #n# vñj #f#
B vññ. £ · i #£j£ i £ ~ vñ# n"n)£« ~ ni #£ · j l a #£ i #
, ~ " £ , - i " . ~ " #
~ afij£ 0 ~ vññ£ - i #££ * a ij£ ~ #
» » » i vññ£ · i #££ * a ij£ ~ #



A: Mills County Economic Development Foundation

When considering Amendment 2 to the Action Plan, the State reviewed its funding projections and expenditures in the MID area and determined that remaining grant funds would better meet unmet needs through the construction of new housing for LMI households. Amendment 2 to the Action Plan was proposed to help increase affordable housing opportunities in Mills County. With Amendment 2, the State will be able to award projects proposing to construct approximately 79 rental and 85 single-family owner-occupied units in Mills County for LMI households.

Steven Stransky

From: Hamburg Iowa <cityofhamburg106@gmail.com>
Sent: Thursday, January 27, 2022 07:30
To: Steven Stransky
Subject: Housing Project

Since the Flood of 2019 we will have lost over sixty homes which is huge for our town. Hamburg houses 90% of the jobs in Fremont County. By having the housing project we won't just rebuild our town but also bring children into our school district. With all the job opportunities available not just in Hamburg but in the surrounding areas housing is a must. We have two 10 acres plots of ground for housing developments. This grant is giving Hamburg the ability to help grow Fremont County as well as our community. With new housing opportunities not only will we grow our community but also it will help expand our Main Street businesses.

Thank you,
Sheryl Owen
City Clerk
City of Hamburg

A: City of Hamburg

When considering Amendment 2 to the Action Plan, the State reviewed its funding projections and expenditures in the MID area and determined that remaining grant funds would better meet unmet needs through the construction of new housing for LMI households. With Amendment 2, the State will be able to award a project proposing to construct approximately 40 single-family owner-occupied units in Hamburg for LMI households. If the pending award project in Hamburg is fully completed, this new construction will come close to replacing the approximately 59 units awarded FEMA Match buyout funds in the community.

Steven Stransky

From: awlogan@iowatelecom.net
Sent: Wednesday, January 26, 2022 15:13
To: Steven Stransky
Subject: 2019 CDBG-DR

Steven,

I am the City Clerk/Administrator for the City of Logan. Logan currently has 3 homes that are being considered for the CDBG-DR funds. If the funding is granted for these 3 homes, it will make a significant impact on Logan in various ways. First, the City will have 3 new-construction, available homes for families in Logan. Affordable, high efficient, new homes in Logan are rarely available so this will also help to attract new families into Logan from surrounding cities. Secondly, the area where these 3 homes will be built was previously a blighted area. The lots held old, uninhabited mobile homes that had been uninhabited for over 5 years. The City purchased one of these properties and used grant funds to help clean up the lot and the developer purchased the adjacent lot and did the same. The City sold their lot to the neighboring developer and now 3 new homes will be built where there once stood two dilapidated mobile homes. This will make a huge improvement to this neighborhood and the surrounding properties. The City plans to make improvements to the adjacent street, water and sewer lines, thus improving City infrastructure for the whole block. The City Council and Mayor are actively trying to grow Logan by finding ways to offer housing to all income levels. This is a huge step in that direction!

With regards to the proposed Amendment #2, the City agrees with the proposal to reallocate funds to the programs with the demonstrated need. The reallocation in support of construction of new housing with down payment assistance and infrastructure in support of housing will make a substantial investment in rural housing in Southwest Iowa! Thank you for your continued efforts in improving rural housing in Iowa!

Sincerely,
Angela Winther
City Clerk/Administrator
City of Logan, Iowa

A: City of Logan

When considering Amendment 2 to the Action Plan, the State reviewed its funding projections and expenditures in the MID area and determined that remaining grant funds would better meet unmet needs through the construction of new housing for LMI households. With Amendment 2, the State will be able to award a project proposing to construct approximately 3 single-family owner-occupied LMI units in Logan, a community in the MID area. In total, with Amendment 2 and if all currently awarded and pending applications are fully completed, 2019 CDBG-DR funds would support the construction of 253 new LMI housing units in the MID area. This would come close to replacing the 262 housing units in the MID area that have been awarded buyout funds through the FEMA Match Buyout Program.

City of Woodbine
517 Walker Street
Woodbine, IA 51579
712.647.2550 (ofc)
712.647.2522 (fax)



Date: January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

As the Mayor of Woodbine, and on behalf of the City of Woodbine, please acknowledge my support, and the full support of this municipality for the CDBG-DR grant. Our community is growing, but the current demand for affordable housing across the full spectrum of demographics greatly exceeds the supply. I can't overstate how great the impacts of the CDBG-DR program will for our school system and local workforce development. Businesses in the wider Woodbine area are growing, but it is difficult for new families moving to the area to find the type of safe, energy-efficient housing this program would provide. Therefore, the rapid construction of new affordable housing would provide an immediate boost to Woodbine and the surrounding communities.

Sincerely,



Robert P. Cogdill
Mayor
City of Woodbine
Rob.Cogdill@gmail.com
712.269.5849 (cell)

Woodbine Community School District

501 Weare Street, Woodbine, IA 51579

Jill Ridder
Elementary School Principal
Phone (712) 647-2440
Fax (712) 647-2526

Justin Wagner
Superintendent of Schools
Phone (712) 647-2411
Fax (712) 647-2526

Scott Breyfogle
Secondary School Principal
Phone (712) 647-2227
Fax (712) 647-2526

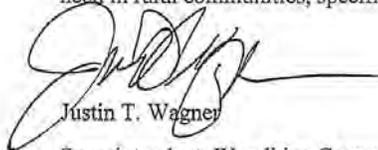
Date: Jan 26, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

My name is Justin Wagner and I am the Superintendent of the Woodbine Community School District and the IGNITE Pathways Regional Career and Technical Education Center. There is an immediate need for affordable housing for all demographics, families, senior citizens and first time homebuyers. There have been 41 new students that have enrolled in the Woodbine Community School District in the last 18 months. This is unprecedented growth, which is only compounding our existing need for immediate affordable housing for all demographics.

Additionally, there is a scarcity of rentals and efficient homes throughout the community. A majority of our housing stock was built prior to 1945 and requires high costs associated with the maintenance of those homes. Unquestionably, additional housing will positively influence workforce recruitment for businesses in the area as well the 41 new students and families to the community.

Finally, with the IGNITE Pathways Regional Center being constructed and opening in August of 2023, there will undoubtedly be more families and students coming to Woodbine. The need will only continue to grow and be exacerbated by the first ever Regional CTE Center in Southwest, Iowa. We are experiencing growth on top of an decade long of unmet housing needs. We need immediate assistance in affordable housing. Thank you for your support and for your recognition of the affordable housing need in rural communities, specifically in Woodbine. Your support is appreciated!



Justin T. Wagner

Superintendent, Woodbine Community Schools

Mission Statement: " Woodbine provides an environment where all are welcome and given access to personalized, unparalleled experiences that will positively shape futures".



January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

The CDBG-DR grant will bring unprecedented opportunities to Southwest Iowa. As Director of Building Blocks Academy Childcare Center in Woodbine, I hear of the need for more affordable housing in our town every day. Nearly half of the children enrolled in our center live in communities other than our community. Many of the families travelling to Woodbine for childcare have expressed interest in relocating to our growing community – but have found housing options scarce and less than desirable. I believe that creating efficient affordable housing options will exponentially increase the need for quality childcare in our community – thus enable the childcare center I operate to grow and prosper. More affordable housing for families coming into our community will also positively impact Woodbine's school and small businesses – things vital to a small town. I fully support and believe the CDBG-DR grant will positively impact the social and economic opportunities of Woodbine and all of Harrison County.

Sincerely,

A handwritten signature in black ink, appearing to read "Deb Moores", written in a cursive style.

Deb Moores

Director, Building Blocks Academy Childcare Center



Woodbine Community Schools

Mrs. Jill Ridder, Elementary Principal (712) 647-2440
Mr. Scott Breyfogle, High School Principal (712) 647-2227
Mr. Justin Wagner, Superintendent (712) 647-2411

Date: Jan. 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To whomever it may concern:

I am writing this letter in support of the CDBG grant within the community I reside. The need for housing is apparent, and I personally know of families waiting to formally join Woodbine, but cannot do so due to the scarcity and affordability of housing. Small rural communities need to be aggressive when it comes to innovative approaches on attracting others to our towns, and this grant will be a step in allowing Woodbine to do this. When the population grows, so do businesses within a community. Woodbine Community entities do not work in singletons, but as a team growing together within our businesses and education.

In closing, I am in full support of the CDBG-DR grant, and I'm eager to see the positive impact it will have on our community, county and region.

Sincerely,

Jill Ridder

501 Weare Street Woodbine, IA 51579 | (712) 647.2227 | woodbine.k12.ia.us

Kyle Bartels
43 9th Street
Woodbine, IA 51579

Date: January 27, 2022

RE: **Amendment 2 to the 2019 CDBG-DR Action Plan**

To whom it may concern,

I'm writing this letter in support of Amendment 2 to the CDBG-DR Action Plan. As an educator in Woodbine Iowa, I see the importance of this amendment and the impact it will have on your community. Our community is in the midst of a growth spurt and we are in desperate need of affordable housing. There is a minimal selection of houses to purchase in Woodbine and most of the houses were stock built prior to 1945 and have a high level of maintenance required to them before becoming livable for incoming families. I am in full support of the initiatives this community is currently investing in and the CDBG-DR grant will impact our community, county, and region in a positive way.

Sincerely,

Kyle Bartels

**FARMERS TRUST
AND SAVINGS BANK**
Earling • Harlan • Woodbine

January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom it may concern,

I am President and CEO of Farmers Trust and Savings Bank and Board member of Woodbine Community Betterment & Development corp. As many small towns do our community has been working to keep our community growing over the last 25 years. One item that has always been a need for Woodbine is quality affordable housing. A lot of the current housing inventory was built prior to 1950. We have done a lot of work over the years to rehab existing homes in the community but the need for safe, energy efficient housing is a real need in Woodbine.

The project will have a direct positive impact on our School system and enrollment and aid the recruitment of workforce for the businesses in Woodbine and surrounding area. The new development and construction will have a positive impact on the economy, creating jobs as well as building much needed tax base for the County and City.

I am in full support of the project and grant award as the CDBG-DR grant will have a very positive impact on not only the community of Woodbine but Harrison County as well.

Sincerely,



Roger Kenkel
President & CEO
Farmers Trust & Savings Bank
510 Lincoln Way
Woodbine IA 51579

EARLING OFFICE
122 Main Street • PO Box 285
Earling, IA 51530-0285
(712) 747-2000 • Fax # (712) 747-6275

HARLAN OFFICE
1901 Chatham Ave • PO Box 724
Harlan, IA 51537-0724
(712) 235-2000 • Fax # (712) 235-2003

WOODBINE OFFICE
510 Lincoln Way • PO Box 11
Woodbine, IA 51579-0011
(712) 647-3375 • Fax # (712) 647-3378

Visit our Web Site at www.ftsbank.net

W**WOODBINE COMMUNITY SCHOOLS****W****501 WEARE STREET
WOODBINE, IOWA 51579**Mrs. Jill Rikler
Elementary Principal
647-2400Mr. Scott Brejckle
High School Principal
647-2227Mr. Justin Wagner
Superintendent
647-2411

Date: Jan 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom It May Concern:

I am writing in regards to the Amendment 2 to the 2019 CDBG-DR Action Plan. We, as a nation, need to be strategic in planning and supporting our area communities with affordable housing, especially those in impoverished counties like Harrison County, Iowa. There are a multitude of positive benefits for those that live in our area who need affordable housing if the Amendment 2 to the 2019 CDBG-DR takes place. First, it would eliminate the scarcity of efficient homes in decent price points that middle class people can afford. It would also increase suitable rentals as the market would open up opportunities of livable establishments. One example of the rental and affordable housing scarcity in the area, a family had to move out of the county and are currently living in a mobile camper until something becomes available for them so their five children can attend school where they have gone to school since preschool. Another example, a family had an accidental house fire and had to stay with extended family until they found a suitable home which ended up being out of the county as well. As you can see, the shortage of rental and properties for sale is scarce. The second reason for approving the amendment would be to provide new housing that is efficient with minimal maintenance due to the fact that a majority of the housing in our area was built prior to 1945. This also brings about the fact that the housing is not energy efficient and lacks the safety requirements that are in place today. The money that our families have to budget goes towards heating, electricity, natural gas, and water because of these inefficiencies within the home that they live in. If affordable, new housing was available it would mean that these wasteful expense practices would be eliminated. The biggest improvement for the county would be that it would positively impact workforce recruitment for area businesses and even bring new businesses into the area. The domino effect would impact the schools in the area as well which again increases the migration of people and families into the county. Finally, aren't our families, seniors, first time home buyers worth it? I think they are. Our county is worth being able to offer affordable housing, improved community planning, and increased employment opportunities - all of these will follow if we say yes to Amendment 2 to the 2019 CDBG-DR Action Plan.

I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Sincerely,



Tracy Lee Kelley
Woodbine & Boyer Valley Schools
Elementary Curriculum & PD Director
Home address:
2999 231st Street
Logan, IA 51546



Caren & Gary Alton
2956 Par Trail
Woodbine, IA 51579

Date: January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

It is my firm belief that the CDBG-DR grant will offer breakthrough opportunities for a wide demographic of the people in our area. Families, seniors, and first home buyers will have the prospect of new, modern, and energy efficient housing in a community that currently has little to no available housing units. Expansion of affordable housing translates to workforce and business growth that will fuel our community's ability to thrive.

Sincerely,

Gary Alton



501 Normal Street PO Box 139
 Woodbine, Iowa 51579
 712-647-2221

FOUTS FUNERAL HOME

Toll Free 1-800-644-3996
Paul A. Fouts, Director

Serving Woodbine, Dunlap, & Surrounding Areas
www.foutsfuneralhome.com
pafouts@windstream.net



Highway 30 & Court Streets
 Dunlap, Iowa 51529
 712-643-5123

January 27, 2022

RE: Amendment to the 2019 CDBG-DR Action Plan

Woodbine is in need of affordable housing for all demographics. (Families, seniors and first time home buyers). The rentals in town are filled and have a waiting list to get into them. Most of the existing homes were built prior to 1945. New energy efficient housing will positively impact our workforce recruitment for our businesses in town, help our school system and spur other economic growth in our community.

I am in full support and believe the CDBG-DR grant will be positive for our community and area.

Thanks for your time.

Paul A. Fouts

Paul A. Fouts

FARMERS TRUST
AND SAVINGS BANK

Earling • Harlan • Woodbine

January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom It May Concern:

Amendment 2 to the 2019 CDBG-DR Action Plan has my full support for the Woodbine Community. I've been involved in this up and coming community for over three years. In these three years, I have seen a constant battle for housing. I have no doubt in my mind that this amendment will give the Woodbine Community the breakthrough that it needs. In order for the community to keep improving, it need's the affordable, appropriate, available housing this amendment will provide. Low to moderate income homes fuel this town. The elderly/retired class left a mark here, and it shouldn't be erased. If they're just given an opportunity, the first-time home buyers can start their lives here. This will benefit the entire Woodbine community.



Max Langenfeld
Consumer Lender

EARLING OFFICE
122 Main Street • PO Box 285
Earling, IA 51530-0285
(712) 747-2000 • Fax # (712) 747-6275

HARLAN OFFICE
1901 Chatburn Ave • PO Box 724
Harlan, IA 51537-0724
(712) 235-2000 • Fax # (712) 235-2003

WOODBINE OFFICE
510 Lincoln Way • PO Box 11
Woodbine, IA 51579-0011
(712) 647-3375 • Fax # (712) 647-3378

Visit our Web Site at www.ftnsbank.net

TOMMY GATE®

Woodbine Manufacturing Company P (602) 955-2144
33717 N. Scottsdale Road, Suite 120 F (602) 955-3902
Scottsdale Arizona 85266 E info@tommygate.com

January 26, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

My name is Jeremy Jacobsen and I am the Director of Workforce Development for Woodbine MFG./Tommy Gate located in Woodbine, Iowa. The availability of cost and energy efficient homes for rent or purchase in our community are in short supply. We have an immediate need for affordable housing in the region for a variety of demographics such as families, first-time home buyers and seniors. With the enrollment growth in our local school system and employers increasing need for workers the addition of housing will have nothing but positive impacts. Housing availability is crucial when employers are recruiting workers that do not live in the immediate area and are looking to relocate.

I am in full support of the CDBR-DR grant and feel that it will have a positive impact on our community for many years to come.

Sincerely,

Jeremy Jacobsen

Director of Workforce Development

Woodbine Mfg./Tommy Gate



www.tommygate.com



Woodbine Community Schools

Mrs. Jill Ridder, Elementary Principal (712) 647-2400
Mr. Scott Breyfogle, High School Principal (712) 647-2227
Mr. Justin Wagner, Superintendent (712) 647-2411

Date: January 26th, 2022

To Whom it May Concern:

I am writing this letter in support to for the CDBG-DR grant and the impact it will have on the community of Woodbine as well as in Harrison County. My family and I moved to Woodbine in the fall of 2020 when I took the 5-12 Principal position. We have fallen in love with the people, the community, and the school over the past 18 months. This community is one that is fully supportive of innovation and growth. My wife and I are so excited about the learning and living opportunities that our three children have in front of them and have already seen the benefits in their development.

When we first started looking at housing in town, there was not a vast selection of suitable homes for our 5 person family. Luckily for us, a home was in the process of being refinished by the Woodbine School Construction Trades program. While things worked out for our family, my concern is that with limited housing available in town, this community will be unable to handle the growth that I have seen coming first hand because of my position. We had 11 new students start at the school in January and I believe this trend will continue due to the ongoing efforts of a team that believes deeply in transforming education. The work being done has caught peoples attention and will continue to attract families outside of Woodbine!

I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Scott Breyfogle
Woodbine CSD
5-12 Principal/Activities Director

501 Weare Street Woodbine, IA 51579 | (712) 647.2227 | woodbine.k12.ia.us

Grato Holdings, Inc.

Energique, Inc. • Apotheca, Inc. • Liddell Laboratories, Inc. • Peaceful Mountain, Inc.
201 APPLE BLVD, WOODBINE, IA 51579 800-736-3130 FAX 888-898-0401

January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

The CDBG-DR grant provides for critical housing needs in our area by providing suitable and affordable housing. The current options are very not efficient and require significant upkeep which to many is outside of their budget. The additional housing options will also aid in recruitment of workforce in the area which desperately needed.

I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Sincerely,



Mike Evans, CEO



Murdock

Carrie Murdock
1400 Quay Ave Woodbine, IA 51579
402-290-7574
carriem@nustyle.net

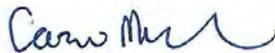
January 27, 2022

Re: Amendment 2 to the 2019 CDBG-DR Action Plan

To whom it may concern,

My husband and I are Napa store owners in and around Harrison County. We also own a car wash in Harrison County. The Crew Center and Ignite Pathways regional center was finished in Woodbine in late 2020. Since that was built, we have seen huge increases in enrollments at the Woodbine School and housing needs in Woodbine. We need safe and efficient housing for families. The Woodbine community is lacking affordable housing for families, seniors, and first-time home buyers. There are wait lists for rentals and a lack of efficient homes at a decent price point. Also, the majority of our housing inventory was built prior to 1945 which causes families to pay a lot in maintenance. New construction of affordable housing will greatly impact families and seniors in Harrison County and Woodbine. The new affordable housing will positively impact the workforce recruitment for our business that has been lacking over the past two years.

Sincerely



Carrie Murdock

January 25, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

Woodbine is one of the few small towns in Iowa that is continuously growing. It is empowered by driven community members that take pride and initiative to promote improvement for a sustained future. I was born and raised in Woodbine and recently moved back in the fall of 2020.

Woodbine's newly developed Crew Center (Wellness/Rec Center), that serves the entire region, created a job opportunity for me to relocate back home with my wife and kids. I am the Director at the Center. Since moving back to Woodbine, I have yet to be able to find any available homes in the area to settle down in. I am one of many examples that are looking for housing in a growing community that doesn't exist.

Woodbine's rapidly evolving community has many projects occurring; most revolving around the vast increase in school enrollment and families wanting to move to the area. If there ever has been a good time and location for increased housing development it is right now in Woodbine, Iowa. I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Sincerely,

Kane Thompson
26 9th Street Unit A
Woodbine, IA 51579



Date: Jan 25, 2022

RE: Amendment 2 2019 CDBG-DR Action Plan – Public Comments

I am writing to convey my positive support for the Affordable Family Homes plan for Harrison County and Woodbine per the CDBG grant.

As a community and economic development professional, I see the need for various price points to meet demand as our area industries work to fill positions. We have a robust group of businesses in the area creating a reliable and sound economic climate with growth potential. In order for their HR to recruit and sustain staffing, an adequate housing supply must be available.

This grant will be a huge shot in the arm for Harrison County and area communities. I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be tremendously positive.

Regards,



Deb Sprecker
Executive Director

Woodbine Main Street, Inc.
313 Walker Woodbine, Iowa 51579
www.woodbineia.com
woodbinemainstreet@windstream.net
(712) 647-3434



Date: January 26, 2022

Iowa Economic Development Authority
1963 Bell Avenue, Suite 200
Des Moines, IA 50315

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom it May Concern:

Arch Icon is a small housing development business in Woodbine. Over the past 11 years we've helped create 46 housing units in Woodbine in the way of upper story downtown apartments and townhomes for both families and the elderly. All of these units are full and have been for years. Arch Icon alone has a waiting list of 7 families looking for rental units with no units available. Rose Court Estates, 14 elderly duplexes for rent, has a waiting list so long they're no longer taking names. The need and demand for any and all types of housing (single family, townhome, multifamily, for sale and for rent, affordable and market rate) in Woodbine and the adjacent communities of Dunlap, Logan and Missouri Valley along Highway 30 in Harrison County is urgent. Few, if any, single family homes come up for sale that are affordable to those making at or under the Median Area Income. And, they are typically sold in one or two weeks. The housing stock on average is old (1945) and needs new elderly independent living units to make room for younger single families in renovated older housing stock. We have never seen so much demand, which we believe can be attributed to:

- Strong employment base with several large employers including Woodbine Manufacturing (Tommy Gate), Grato Holdings pharmaceuticals, Azria Health nursing home, Woodbine Community School.
- Community growth – Woodbine's CREW (Community, Recreation, Education and Wellness) Center drawing people to Woodbine.
- Housing growth – new Harvest Hills subdivision.
- School growth – Career and Technical Education opportunities now being offered through Ignite Pathways is drawing new students to our school and their parents to relocate to Woodbine.
- Rural migration – We've seen increased demand for relocation from urban areas filling local job opportunities, for those who can work remotely and who want to enjoy the safety and peace of rural living and with a school district with educational opportunities not found elsewhere in rural Iowa.

Woodbine has a proven track record when it comes to sustainable economic development with housing as the foundation for that development. Per capita, I'd would guess Woodbine is outperforming many more urban areas in western Iowa. We are in full support and believe the CDBG-DR grant impacts for Woodbine and Harrison County will be positive, measurable and sustainable.

Sincerely,

Darin Smith
Arch Icon Development

Date: Jan 26th, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom it may Concern

The GDBG grant funding would allow the need for affordable housing for all demographics: families, seniors, first time home buyers efficient homes at a decent price point with the majority of our housing stock built prior to 1945.

The need for safe energy efficient homes comes with high level of importance due to the growing demands on electric transmission infrastructure.

Housing will positively impact workforce recruitment for existing and future business, directly impacting the local school district.

Woodbine Municipal Light & Power is in full support and believes the CDBG-DR grant will greatly impact community, county and region.

Sincerely,



James Reisz

Woodbine Municipal Light & Power
Electric / Water Superintendent

Date: January 26, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

The CDBG-DR grant will have an immediate and lasting impact on not only the Woodbine, IA community, but the entire southwest Iowa region. Affordable housing is often the number one concern of residents either looking to transition from their current home or move into a new community. As housing costs for new construction and the resale market continues to increase faster than household incomes, communities like Woodbine must look to these CDBG grants to continue to grow and sustain itself. In an environment where young families are needing the career opportunities of a larger city while seeking the comfort and feel of a small community, Woodbine is in a unique position to offer both. This grant will allow the community located just 45 minutes from the Omaha, NE metro area an opportunity for young families to get the best of both worlds. New families are critical to the school system, support local businesses in the region, and plant roots that have generational impacts. Affordable housing is the number one need for this to take place. For this reason and more, I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Sincerely,

Nathan Barry
3002 194th St.
Woodbine, IA 51579

January 26, 2022

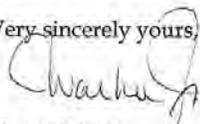
Public Comment for Amendment 2 to the 2019 CDBG-DR Action Plan

I am writing to convey my positive support for the Housing for Families construction of 40 homes for Harrison County and Woodbine per the CDBG grant.

This grant will be immensely helpful to our scarcity of housing, especially for people who require a price point within their budget. It will allow families to move in to our area and work in our businesses. The project will also be a boon to our excellent school system.

I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Very sincerely yours,

A handwritten signature in black ink that reads "Chuck Warner". The signature is written in a cursive style with a large, looped initial "C".

Chuck Warner

112 Fischer Drive

Woodbine, IA 51579

**FARMERS TRUST
AND SAVINGS BANK**

Earling • Harlan • Woodbine

January 26, 2022

TO: Whom it may concern

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

My name is Randy Bruck, Assistant VP with Farmers Trust & Savings Bank in Woodbine, IA. In my 12-year banking career I have helped numerous individuals purchase a home and a significant number purchase their first home; a great pride I take in helping a family make this step in life. I have worked with a number of down payment assistance grants for first time home buyers and without the grant the buyers would be unable to afford purchasing a home.

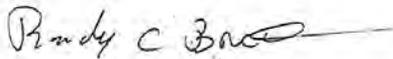
The CDBG-DR Grant will be a large impact of the community I support; not just being housing in Woodbine and Harrison County, but many neighboring communities, Woodbine School district and many local businesses. Housing is the backbone of any community and Woodbine needs additional affordable housing. I have met with a number of individuals in the past 6 months that would be excellent candidates of the new housing development. One individual just purchased a home 2 months prior and needed to do repairs as they had bats in their kids' bedroom. They purchased the home with little money down and are unable to afford the necessary repairs. The CDBG-DR Grant would have been a huge benefit to this family as a new home would be affordable and no maintenance required for the first several years.

With limited housing available rental rates have increased. I have a customer who purchased a few rentals within the past year and they had multiple request to rent the home; rates above cost of homeownership. The CDBG-DR Grant will help in creating additional homes for these families moving to Woodbine.

Small communities like Woodbine are much like families; we do anything we can to help those in need. This grant will be another way we as businesses and individuals are able to help those families. Homeownership is the American dream; and with this grant we can make that dream become a reality for many families; and having affordable home ownership can ensure the next generation a better start for their future.

As you can understand I'm in full support and believe the CDBG-DR grant will have a positive impact on my community.

Sincerely,



Randy Bruck
AVP Ag/Comm Loan Officer

Date: January 26, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

From a small community in Harrison County, Woodbine is very appreciative of the opportunity to received affordable housing grants. Like many small/rural community's we don't have the same equal opportunities as other more populated areas have. Although we may have less people, we are a growing community trying to build and sustain safe and affordable housing for the long term. Our need for affordable housing is just as important because we don't have as many options for people to choose from on housing. Our housing need is high as majority of the time there are wait lists and people looking to buy. We have seen an increase of people want to raise their families in small communities like Woodbine. They want to give their kids the positive opportunities to have smaller class size, able to participate in all or activities of their choosing, walkability, and a safer community. Again, we hope the state keeps granting small and rural communities to receive affordable housing grants in the future to help grow and sustain small town living at its best, what Iowa Stands for!

Thanks

Mindy Crook
702 Walker Steet
Woodbine, IA 51579

Family of 7
Main Street Business Owner
Landlord of 12 years
Community Volunteer
Life time resident of Iowa!



January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

The growth and development of the Woodbine community has been due to the diligent, responsible and continuous efforts of individual volunteers, and the cooperative efforts of community organizations, the city and the school district.

While economic development projects such as downtown revitalization, business development recruitment, and health & wellness facilities have been completed, one growth component is lagging. We are missing and needing the Housing part of community development. Available housing for rent or for purchase is very limited in Woodbine. Newer, affordable housing is a necessary ingredient to continue building a sustainable growth economy for our school, area employers, and residents.

I fully support the CDBG grant funding which will create Affordable Housing for Families.

Sincerely,

Dr. Jacqueline Thomsen DC
Board Member
Woodbine Betterment and Development Corporation

1922 Perkins Ave Woodbine Iowa 51579 402-65-1373



HARRISON COUNTY CONSERVATION BOARD

Scott Nelson, Director
2725 Easton Trail
Woodbine, Iowa 51579-9739
www.HarrisonCountyParks.org

Phone: (712) 647-2785
Fax: (712) 647-3225
Email: hccb@HarrisonCountyParks.org
Find us on Facebook

January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

In rural areas such as Harrison County, there is a great need for affordable housing for families, senior citizens, and first-time home buyers. In those homes that are available, they may be energy inefficient and require additional costly maintenance. Low-income housing will positively impact not only the current population, but make communities attractive to new residents wishing to relocate for employment or for their children's school.

I am in full support and believe the CDBG-DR grant impacts for my community, county, and region will be positive.

Sincerely,

Scott Nelson, Director

**FARMERS TRUST
AND SAVINGS BANK**
Earling • Harlan • Woodbine

January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom It May Concern:

I strongly support Amendment 2 to the 2019 CDBG-DR Action plan. There is an urgent need in Woodbine for affordable housing across all demographics including seniors, low-income families, and first-time home buyers. This program would also give a much needed boost to the local workforce as many people employed in our area cannot find affordable housing in or around Woodbine. This amendment would be essential in removing obstacles to affordable housing in our area and beneficial to the community as a whole.

Sincerely,



Hannah V. Heistand
Customer Service Representative

EARLING OFFICE
122 Main Street • PO Box 285
Earling, IA 51530-0285
(712) 747-2000 • Fax # (712) 747-6275

HARLAN OFFICE
1901 Chatburn Ave • PO Box 724
Harlan, IA 51537-0724
(712) 235-2000 • Fax # (712) 235-2003

WOODBINE OFFICE
510 Lincoln Way • PO Box 11
Woodbine, IA 51579-0011
(712) 647-3375 • Fax # (712) 647-3378

Visit our Web Site at www.ftnsbank.net



HARRISON COUNTY RURAL ELECTRIC COOPERATIVE

105 Enterprise Drive, PO Box 2
Woodbine, Iowa 51579
Telephone: 712-647-2727

Our mission is to safely provide reliable electric power and related services at the best possible value for our members.

January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To how it my concern,

Housing in our community will positively impact our workforce recruitment for our business. It will also help provide safe and energy efficient housing for our membership, schools districts, and the community we service.

I am in full support and believe the CDBG-DR grant impacts for my community, county and region will be positive.

Sincerely,



Shadon Blum
Director of Operations

105 Enterprise Drive Woodbine, IA 51579
Office: 712.647.2727
Fax: 712.647.2906
www.hcrec.coop

HCREC is an equal opportunity provider.

Harrison County Rural Electric Cooperative is an equal opportunity provider and employer.

Fax: 712-647-2906
email: harrisoninfo@hcrec.coop
website: www.hcrec.coop

A Touchstone Energy® Cooperative 

FARMERS TRUST
AND SAVINGS BANK
Earling • Harlan • Woodbine

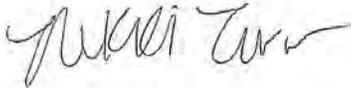
January 27, 2022

RE: Amendment 2 to the 2019 CDBG-DR Action Plan

To Whom This May Concern:

I strongly recommend the Amendment 2 to the 2019 CDBG-DR Action Plan. There is an urgent need in Woodbine for affordable housing for all demographics families, seniors, first time home buyers. This program would also boost to the local workforce as some may find it difficult to find affordable housing in or around the Woodbine area. This Amendment would be essential in removing obstacles to affordable housing in our community.

Sincerely,



Nikki Turner
Customer Service Representative

EARLING OFFICE
122 Main Street • PO Box 285
Earling, IA 51530-0285
(712) 747-2000 • Fax # (712) 747-6275

HARLAN OFFICE
1901 Chatburn Ave • PO Box 724
Harlan, IA 51537-0724
(712) 235-2000 • Fax # (712) 235-2003

WOODBINE OFFICE
510 Lincoln Way • PO Box 11
Woodbine, IA 51579-0011
(712) 647-3375 • Fax # (712) 647-3378

Visit our Web Site at www.fnsbank.net

A: City of Woodbine, Woodbine Community School District, Building Blocks Childcare Academy, Kyle Bartels, Farmer's Trust & Savings Bank, Caren & Gary Alton, Fouts Funeral Home, Tommy Gate, Grato Holdings, Inc., Carrie Murdock, Kane Thompson, Woodbine Main Street, Arch Icon, Woodbine Municipal Light and Power, Nathan Barry, Chuck Warner, Mindy Crook, Ah!Pointment Therapy Chiropractic, Harrison County Conservation Board, Harrison County Rural Electric Cooperative

When considering Amendment 2 to the 2019 CDBG-DR Action Plan, as will be submitted to the federal Department of Housing and Urban Development, the State reviewed its funding projections and expenditures in the MID area (Mills, Fremont, and Harrison counties) and determined that remaining grant funds would better meet unmet needs through the construction of new housing for Low to Moderate Income (LMI) households, those households making up to 80% of the area median income. With Amendment 2, the State will be able to award a housing project proposing to construct approximately 40 single-family owner-occupied homes in Woodbine that will be affordable for LMI households with purchase prices no greater than \$175,000, with up to \$20,000 in down payment assistance available. These homes will be built according to the State's Green Streets Criteria that meets the green building standards required by the *Federal Register* notices for this funding source. While Woodbine did not have any FEMA Match Buyouts, it is a community within the MID area. 262 housing units in the MID area have been awarded buyout funds through the FEMA Match Buyout Program and all new construction units under the State's 2019 CDBG-DR new housing program will be available for a period of time first to 2019 flood victims, which will help to provide affordable units to flood victims who received a buyout or incurred flood damage while also increasing Woodbine's population as addressed in these public comments. Under currently awarded and pending applications, 2019 CDBG-DR funds would support the construction of 253 new LMI housing units in the MID area if all awarded and pending award projects are fully completed, including 40 units in Woodbine.



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

Ms. Deborah V. Durham
Director
Iowa Economic Development Authority
1963 Bell Avenue
Des Moines, Iowa 50315-1000

Dear Ms. Durham:

The Department is approving the State of Iowa's Action Plan Amendment (APA) 2 for Community Development Block Grant disaster recovery (CDBG-DR) funds appropriated under the Additional Supplemental Appropriations for Disaster Relief Act, 2019 Public Law 116-20 in response to 2017, 2018 and 2019 disasters. The State of Iowa was allocated \$96,741,000 from this appropriation for flooding in 2019. The Amendment will now be considered part of the State's approved Action Plan under grant number B-19-DF-19-0001.

Previously, HUD approved APA 1 to the State's 2019 CDBG-DR Action Plan on December 15, 2020. APA 1 reallocated funds from activities within the Housing Program. The budget reallocations included: 1) split of developer housing incentives program budget of \$23,943,398 between rental and single-family housing activities; and 2) merger of down payment assistance program budget of \$2,176,673 into single-family new construction housing activity.

On December 1, 2021, the State submitted APA 2 for reallocating funds from the Federal Emergency Management Agency (FEMA) Match Buyout, CDBG-DR Funded Buyout, and Stormwater Infrastructure activities to the Construction of New Housing with Down Payment Assistance and Public Infrastructure in Support of Housing Activities in the most impacted and distressed (MID) area. The State provided a 15-day citizen comment period, from November 16, 2021 - December 1, 2021, on the amendment. On December 22, 2021, the Department advised the State that they were required to republish the substantial amendment for 30 days in order to comply with Federal Register notice 85 FR 4681 requirements for public comment periods. The State reopened its public comment period for the APA 2 for 30 days, from December 30, 2021 - January 30, 2022.

On January 31, 2022, the State resubmitted the APA 2 to HUD. APA 2 reallocates funds from the FEMA Match Buyout, CDBG-DR Funded Buyout, and Stormwater Infrastructure activities to the Construction of New Housing with Down Payment Assistance and Public Infrastructure in Support of Housing activities in the MID area. When considering APA 2 to the State's Action Plan, the State reviewed funding projections and expenditures in the MID area and determined that funds would better meet unmet needs in the MID area if they were programmed to support the construction of new housing for low- and moderate-income (LMI) households rather than launch new buyout or stormwater infrastructure activities.

www.hud.gov

espanol.hud.gov

With APA 2, program funds would support the construction of 253 new LMI housing units in the MID area if all approved and submitted applications are fully completed. This would come close to replacing the 262 housing units in the MID area that have been awarded buyout funds through the FEMA Match Buyout Program. Without the amendment, the imbalance between units lost and units gained in the MID area would increase as fewer new housing units could be awarded without the reprogrammed funds.

APA 2 will make the following changes in the State's Action Plan:

- Reduce funding by \$17,639,886 for the FEMA Match Buyout
- Reduce funding to \$0 and eliminate the CDBG-DR Funded Buyout
- Reduce funding to \$0 and eliminate the CDBG-DR Demolition & Clearance
- Reduce funding by \$1,349,934 for the Construction of Rental Housing
- Reduce funding by \$16,462,414 for Stormwater Infrastructure
- Reduce administration funding by \$76,443
- Reallocate \$15,759,822 to the activity of Construction of New Housing with Down payment Assistance for Homeowners
- Reallocate \$30,135,444 to the activity of Public Infrastructure in Support of Housing
- Reallocate \$516,774 to Planning

The following table outlines the changes and the revised budget based on APA 2.

Table 1: CDBG-DR Allocations

in in

Program	Activity	APA 1	APA 2 Proposed Change	HUD Approved APA 2
Housing \$72,555,750	Buyout-FEMA Match	\$25,394,513	-\$17,639,886	\$7,754,627
	Buyout-CDBG funded	\$10,783,236	-\$10,783,236	\$0
	Demolition/ Clearance	\$100,127	-\$100,127	\$0
	Infrastructure in Support of Housing	\$10,157,805	+\$30,135,444	\$40,293,249
	Construction of New Housing with Down Payment Assistance	\$15,000,000	+\$15,759,822	\$30,759,822
	Construction of Rental Housing	\$11,120,069	-\$1,349,934	\$9,770,135
Infrastructure \$19,154,718	CDBG-DR Stormwater Infrastructure	\$19,154,718	-\$16,462,414	\$2,692,304
Planning \$193,482	Land Use Planning	\$193,482	+516,774	\$710,256
Administration \$4,837,050	IEDA Staff, Recipient Grant Admin, Professional Services Contracts to assist grant admin	\$4,837,050	-\$76,443	\$4,760,607
	Total	\$96,741,000		\$96,741,000

The Department is committed to working with you and your staff to address the State's recovery needs and assist citizens of the State of Iowa. If you have any questions, please contact Ms. Tennille Parker, Director, Disaster Recovery and Special Issues Division, at (202) 402-4649 or by email at Disaster_Recovery@hud.gov.

Sincerely,

Digitally signed by JESSIE
KOME
Date: 2022.02.28 11:28:28
-05'00'

JESSIE KOME
Jessie Handforth Kome
Director
Office of Block Grant Assistance

State of Iowa – Action Plan, Amendment #3 Non-Substantial

While amid the public comment period for Amendment 2 to the State of Iowa’s 2019 CDBG-DR Action Plan, appropriate documentation was submitted for an infrastructure in support of housing component to a pending housing award in Round 2 of the State’s Construction of New Housing with Down Payment Assistance for Homeowners program. This infrastructure in support of housing request is necessary for the housing project to be constructed. In order to fund this, the Method of Distribution as approved after Amendment 2 needs to be adjusted to accommodate the request. This will occur through reducing Admin and redirecting those funds into Housing.

See the table below for the current Program Budget Summary in the 2019 Action Plan as amended through Amendments 1 and 2:

Current Program Budget Summary

Program	Funding by Program	%	Activity	Funding by Activity
Housing	\$88,577,833	92%	Buyout – FEMA Match (8%)	\$7,754,627
			Infrastructure in Support of Housing (42%)	\$40,293,249
			Construction of New Housing with Down Payment Assistance for Homeowner (32%)	\$30,759,822
			Construction of Rental Housing (10%)	\$9,770,135
Infrastructure	\$2,692,304	3%	CDBG-DR Stormwater Infrastructure	\$2,692,304
Planning	\$710,256	1%	Land use planning	\$710,256
Admin	\$4,760,607	5%	IEDA Staff, Recipient Grant Administration, and Professional Services Contracts to assist with grant administration.	\$4,760,607
	\$96,741,000	100%	Total Funds Allocated	\$96,741,000

See the table below for the proposed Program Budget Summary through Amendment 3:

Proposed Program Budget Summary

Program	Funding by Program	%	Activity	Funding by Activity
Housing	\$90,468,676	93.52%		
			Buyout – FEMA Match (8.00%)	\$7,754,627
			Infrastructure in Support of Housing (46.63%) (plus \$1,890,843)	\$42,184,092
			Construction of New Housing with Down Payment Assistance for Homeowner (34.00%)	\$30,759,822
			Construction of Rental Housing (10.80%)	\$9,770,135
Infrastructure	\$2,692,304	2.78%	CDBG-DR Stormwater Infrastructure	\$2,692,304
Planning	\$710,256	0.73%	Land use planning	\$710,256
Admin	\$2,869,764	2.97%	IEDA Staff, Recipient Grant Administration, and Professional Services Contracts to assist with grant administration. (minus \$1,890,843)	\$2,869,764
	\$96,741,000	100%	Total Funds Allocated	\$96,741,000

IEDA considers this change non-substantial as the State will still be offering the same programs described in the Action Plan as previously amended, there is no change in beneficiaries, and the amount being reallocated between existing programs is less than \$5 million. Therefore, this change will not trigger the definition of a substantial amendment in the Action Plan. Please review these changes and the State will incorporate them into our Published Action Plan prior to making an award for this pending project.

Steven Stransky

From: Wilkerson, Jo A <Jo.A.Wilkerson@hud.gov>
Sent: Friday, March 4, 2022 10:17
To: Steven Stransky
Cc: Disaster_Recovery; Foulds, Phyllis J; Parker, Tennille S; McNally, Francis P; Forsyth, Chad R; Hulse, Dawn A
Subject: RE: <External Message> Amendment 3 - State of Iowa 2019 CDBG-DR Action Plan

Dear Steven:

This email serves as acknowledgement of the Action Plan Amendment (APA) 3 Non-Substantial for the State of Iowa's 2019 CDBG-DR grant.

The purpose of the APA 3 is to adjust the method of distribution in order to reallocate funds from Administration and redirect the funds to the Housing Program. Documentation has been submitted to the State for an Infrastructure in Support of Housing component to a pending housing award in Round 2 of the State's Construction of New Housing with Down Payment Assistance Program. The Infrastructure in Support of Housing request is necessary for the housing project to be constructed.

HUD acknowledges that the APA is non-substantial in accordance with the requirements in the State's 2019 Action Plan. The State will be offering the same programs in the Action Plan, there is no change in beneficiaries, and the amount being reallocated between existing programs is less than \$5 million.

Thank you.

Jo Ann Wilkerson

From: Steven Stransky <Steven.Stransky@IowaEDA.com>
Sent: Tuesday, March 1, 2022 11:55 AM
To: Wilkerson, Jo A <Jo.A.Wilkerson@hud.gov>
Cc: Disaster_Recovery <DisasterRecovery@hud.gov>
Subject: <External Message> Amendment 3 - State of Iowa 2019 CDBG-DR Action Plan

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,

I have attached to this email Amendment 3, which is a non-substantial amendment proposing to reallocate funds between Admin and Housing. I have also attached an updated version of the Action Plan including this amendment and updating spending projections. We will have this posted to the website later today.

I believe there is a 5-day review period for this. Please correct me if I'm incorrect on that.

Let me know if you need anything else. Hope you have a good day!

Steven Stransky, AICP | Disaster Recovery Team Lead
He/him/his



IOWA ECONOMIC DEVELOPMENT AUTHORITY

1963 Bell Avenue Suite 200 | Des Moines, Iowa 50315

PH: 515.348.6204

IEDA Mobile: 515.214.7321

Steven.Stransky@IowaEDA.com

www.IowaEDA.com