AMENDMENT #3 – November 17, 2014

The amended text is found in the following pages to highlight the information that has changed. The information is also integrated into the entire Action Plan that follows.

The City of Joplin is amending the Community Development Block Grant Disaster Recovery (CDBG-DR) Program's action plan. A submission of this amendment will be made to the U.S. Department of Housing and Urban Development (HUD) following the 7 day comment period.

The amendment includes the addition of two activities to the City's existing Action Plan. The following activities will be added and funded with funds from the pre-existing Land Acquisition/Assemblage and the Mixed-Income Multi-Family Residential activities.

1) **Joplin Affordable Senior Housing**
   Within the Joplin area there are eight senior residential facilities, representing virtually all senior care facilities in Joplin and are representative of the housing choices available to seniors requiring special care housing. The Joplin senior care market is reporting overall occupancy rates between 84.8% (congregate care) to 98.3% (nursing care). As such, there appears to be a shortage of nursing care housing opportunities in the Joplin market. The proposed project will add a variety of affordable senior living options including adding additional beds to the current inventory, reducing this shortage within the community.

2) **Storm Water Improvements**
   The tornado and ensuing heavy equipment caused significant damage to the manhole and storm sewers across the tornado recovery area. In addition, storm debris resulted in blocked drains and significant water damage caused erosion and collapse of areas. Staff surveyed the existing storm water system and estimated replacement costs on undersized, damaged, or otherwise inadequate lines and inlets. Thirty-four projects have been identified with existing priority drainage problems; these projects consist primarily of needed residential neighborhood drainage improvements, with a smaller number of improvements at street intersections and commercial areas. Stormwater projects will be completed prior to paving activity to minimize damage to new pavement.

Activity	Original Funding	New Funding
Land Acquisition/Assemblage	$ 7,440,000.00	$ 6,440,000.00
Mixed-Income Multi-Family Residential	$ 9,000,000.00	$ 4,500,000.00
Joplin Senior Housing	$ 0.00	$ 4,500,000.00
Storm-water Improvements	$ 0.00	$ 1,000,000.00

STORM WATER IMPROVEMENTS

How the assessment informed allocation

The tornado and ensuing heavy equipment caused significant damage to the manhole and storm sewers across the tornado recovery area. In addition, storm debris resulted in blocked drains and significant water damage caused erosion and collapse of areas.

The city has an annual capital program that repairs and replaces system storm sewers with an

annual budget of $96,185.00 annually. Staff surveyed our existing storm water system and estimated replacement costs on undersized, damaged, or otherwise inadequate lines and inlets. The total estimated cost for this project is $14.97 million. Thirty-four projects have been identified with existing priority drainage problems; these projects consist primarily of needed residential neighborhood drainage improvements, with a smaller number of improvements at street intersections and commercial areas. These improvements also allow comprehensive GIS mapping of existing and added improvements. Modernized GIS maps reduce future operational costs as well as master planning development. Stormwater projects will be completed prior to paving activity to minimize damage to new pavement.

CDBG Eligibility and National Objective
This Activity is eligible under 03I, Flood Drainage Improvements, and will utilize the National Objective of Low and Moderate Income Area and Slum and Blight Area. In neighborhoods where the census data indicates the Census Block Groups are eligible to receive LMA assistance, this income classification will be used. For those areas that will not qualify under that National Objective, Slum and Blight classification will be used based on the conditions created by the tornado damage.

Long-term Recovery from Specific Disaster
This project will dramatically improve identified residential and commercial concerns by getting the stormwater off streets quicker and into upgraded conduits, and provides appropriate detention areas for stormwater. The areas identified have deteriorated or were damaged by the tornado and need repair/replacement in order to provide the appropriate amount of service to the areas. Handling the water prior to it backing up streams and onto properties also helps alleviate sanitary sewer issues as well as property flooding. Stormwater flooding can cause significant damage, erosion to property, as well as potential life threatening issues. This project will enhance the targeted neighborhoods by significantly mitigating flooding and reducing stormwater on roadways and properties as quickly and efficiently as possible.

Criteria used to select applications
Applications will not be needed for this program. The priorities of projects will all be decided administratively by the Public Works Department.

JOPLIN AFFORDABLE SENIOR HOUSING

How the assessment informed allocation
Within the Joplin area there are eight senior residential facilities, including one independent living facility, three congregate care facilities, six assisted living facilities, and three nursing homes (note: some projects offer more than one housing type). These eight facilities represent virtually all senior care facilities in Joplin, post tornado, and are representative of the housing choices available to seniors requiring special care housing.

Most effective housing possibilities for aging seniors include multiple housing and care choices in a concentrated area. Referencing Medicare.com and Missouri Department of Health and Senior Services websites for all licensed assisted living facilities, and cross referencing this list

with other senior care facility resources, the identified senior care facilities represent all licensed facilities in Joplin.

The Joplin senior care market is reporting overall occupancy rates between 84.8% (congregate care) to 98.3% (nursing care). The American Seniors Housing Association (ASHA) conducts an annual survey of retirement and senior residential care communities. While the occupancy rate at most senior care facilities surveyed by Bowen National Research within Joplin after the tornado event are comparable to those reported within the region and the nation by (ASHA), the nursing care occupancy rate of 98.3% in Joplin is extremely high and much higher than the ASHA averages. These statistics do not factor in affordability.

As such, there appears to be a shortage of affordable senior care housing options in the Joplin market. Joplin proposes that a range of affordable senior care housing be constructed in the tornado zone, replacing nursing care and other senior housing destroyed.

CDBG Eligibility and National Objective
This Activity is eligible under 03P, Health Facilities, and will utilize the National Objective of serving Low-Moderate Income Clientele.

Long-term Recovery from Specific Disaster
This project specifically aims to provide housing opportunities to seniors within the community. This funding is specifically proposed to fund infrastructure costs associated with the site improvements of the proposed facility, focusing on providing storm water drainage. Creating these rental resources will allow a subset of the population, that may not have the resources, to afford housing tailored specifically to the senior population, and this facility will be essential in reducing the shortage as identified during the earlier Bowen National Research, Housing Needs Assessment study issued April 18, 2014.

Criteria used to select applications
Joplin will request proposals from entities that can demonstrate the ability to finance, construct and manage affordable senior housing. Successful proposals will demonstrate that they have secured a Certificate of Need from the State of Missouri. Joplin will indicate disaster recovery funds will assist with site improvements for the proposal submitted, based on need as shown in submitted underwriting.

BUDGET (Revised 11/17/2014)

COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY BUDGET

Infrastructure Activities	
Sidewalk Reconstruction/Construction	$ 2,500,000.00
Trail Construction	$ 2,000,000.00
Tree Planting	$ 2,000,000.00
Storm Water Improvements	$ 1,000,000.00
Sub Total	**$ 7,500,000.00**
Economic Development	
SPARK – Performing Arts/Depot Renovation	$ 5,390,000.00
Sub Total	**$ 5,390,000.00**
Housing Activities	
Single Family Homeownership Direct Assistance	$12,750,000.00
(Safe Rooms Included in New Construction Activities)	
Mixed-Income Multi-family Residential	~~$ 9,000,000.00~~ $ 4,500,000.00
Joplin Affordable Senior Housing	$ 4,500,000.00
Single Family Rehabilitation	$ 1,500,000.00
Land Acquisition/Assemblage	~~$ 7,440,000.00~~ $ 6,440,000.00
FEMA THU Relocation	$ 60,000.00
Housing Authority Tenant Based Rental Assistance	$ 290,000.00
Housing Authority Site Improvements Repair	$ 210,000.00
Sub Total	**$ 30,250,000.00**
Program Administration Activities	
City of Joplin Administrative Costs	$ 452,667.09
Description: Pro-rata share of salary and benefits of Planning/ Community Development staff plus overhead including supplies, rent, etc	
Consultant Administrative Costs	$ 1,674,041.91
Description: Negotiated Administrative cost to allow for the hiring of a consulting firm to manage the majority of the grant admin and activities. **(5% maximum = $2,263,335.45)**	
Program Planning Activities	
Planning Activities (15% max. = $6,790,006.35)	$ 0.00
Sub Total (20% maximum)	**$ 2,126,709.00**
TOTAL CDBG-DR AWARD	**$ 45,266,709.00**

COMMUNITY DEVELOPMENT BLOCK GRANT

DISASTER RECOVERY

ACTION PLAN FOR THE CITY OF JOPLIN

Supplemental CDBG Disaster Recovery
Authorized by the Supplemental Appropriations Act, 2011
(Public Law 112-55)
U.S. Department of Housing and Urban Development
Docket No. FR-5628-N-01
[Federal Register: April 16, 2012 (Volume 77, Number 73)]

Initial Approval – September 14, 2013

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I. UNMET NEEDS

HOUSING IMPACT AND UNMET NEEDS

The majority of the property in Joplin that was affected by the May 20, 2011 tornado was residential property that contained a variety of single and multi-family as well as owner and renter-occupied dwellings. Because the tornado touched down on the west-side of the City, and indiscriminately tore through neighborhoods, residents of all demographic and income statuses were affected.

The estimates of affected residential dwellings, which would include everything from 1 apartment unit to a single family residence, showed that a total of 7,500 units received some level of damage from this disaster. Approximately 4,000 dwellings were destroyed with an additional 3,500 damaged affecting an estimated 17,000 residents. The dwellings that were deemed uninhabitable were estimated to displace approximately 9,200 residents from the City of Joplin.

A large portion of those 7,500 households that were affected were able to find housing resources either through existing available housing stock or through temporarily staying with friends and family. The immediate housing needs that were identified by the City and FEMA resulted in the placement of 586 Temporary Housing Units (THUs) throughout the community. It became clear very quickly that the regional housing market could not provide for the affected households. The temporary solution of FEMAs THUs was crucial in housing families after the storm; however, these are families that will need permanent housing solutions.

Shortly after the tornado, the City of Joplin commissioned a comprehensive Housing Study to assess the situation. The following are selected recommendations from that study that confirm the need for housing in Joplin[1]:

> *Objective #3: Introduce alternative housing options into the market including condominiums and townhomes to target young professionals and empty nesters.*
>
> Analysis:
> According to demographics provided by ESRI, the age cohorts that include ages 20 to 24 and 30 to 34 are the largest age cohorts in the Joplin area. Many of the people in these age cohorts are young professionals, and some of them are young professionals with children. This segment of the population is an important and growing segment, and housing options should be targeted to meet their growing needs. In addition, the City of Joplin Planning Department stated that it has received several inquiries regarding the availability of condominiums or townhomes in the area by persons looking for lower-maintenance housing options while still maintaining ownership.

[1] Source: Updated Comprehensive Housing Market Analysis; Joplin, Jasper County, Missouri. Novogradac & Company, LLP. 2011

Action:

- Promote the development of upscale townhomes and condominiums with ample amenities for young professionals and empty nesters that are seeking high quality housing without maintenance responsibilities.
- Construct condominiums in urban areas like the CBD and just outside of the CBD so that young professionals can take advantage of being close to transportation while having entertainment options.

Objective #5: Replace demolished/destroyed Section 8 housing in a timely manner.

Analysis:
The May 2011 tornado destroyed or heavily damaged all of the family Section 8 properties in Joplin as well as two senior Section 8 properties leaving just one Senior Section 8 property in service in Joplin. Oak Meadows, Cedar Hill Apartments, Magnolia Heights and Mercy Village at St. John's have stated that they will rebuild their properties. However, Hampshire Terrace and JMA II Apartments were completely demolished and plans to rebuild at this time are unknown. Springview Gardens has not yet reported what will happen in the future.

Action:

- For Section 8 properties that are unsure whether they will rebuild or not, provide incentives to encourage rebuilding.
- Encourage Section 8 properties to apply for LIHTC funds for rehabilitation.
- Expedite the rehabilitation of these properties to place these developments back in service as soon as possible.

Objective #6: Encourage the development of affordable housing including LIHTC properties.

Analysis:
Only two LIHTC developments were affected by the tornado, Redwood Gardens and Redwood Towers; however, Redwood Gardens sustained major damage and Redwood Towers was completely demolished. The destruction of these two developments as well as the low vacancy rates and lengthy waiting lists at existing LIHTC developments indicate the need for additional LIHTC properties. Further, the demographics of the census tracts were tornados completely destroyed the housing stock illustrate a high percentage of renters and a high percentage of low to moderate income households. In order to provide appropriate replacement housing for these households, LIHTC properties would meet these needs by offering affordable rental housing.

Action:

- Entice developers through low-interest loans to increase the amount of LIHTC properties.

- Increase awareness and knowledge of the LIHTC and other state and federally assisted housing programs.
- Construct LIHTC properties near where many of the low to moderate income households previously lived.
- Encourage the development of all unit types from one to four-bedroom units in both multifamily and single-family units to create housing for both persons that were previously renters in traditional multifamily housing, as well as renters that were renting out larger single-family homes.
- Build approximately 560 new units of affordable housing including a combination of single-family rental homes and traditional multifamily apartments.

Objective #7: Educate low to moderate income households on how they can purchase homes and increase the supply of owner-occupied homes that are moderately priced.

Analysis:
Much of the single-family home housing stock that was destroyed by the tornado was older, lower priced homes. There is now a shortage of lower to moderately priced homes in the Joplin area and many of the available homes are new construction with high price tags. As a result, the city needs to encourage the construction of moderately priced homes so that the residents that are now housed in the FEMA trailers can afford to move back into single-family homes.

Action:
- Educate future and prior homebuyers on financing options, access to capital and how to improve their credit worthiness.-Inform future and prior homebuyers on how they can maximum their insurance claims and use this money to rebuild and/or purchase a new home.
- Reach out to local developers to encourage the construction of moderately priced homes to replace the destroyed housing stock.

Objective #8: Replace at least 3,100 housing units including 1,400 rental units and 1,700 owner-occupied units. For the rental units, approximately 560 units should be affordable.

Analysis:
In the May 2011 tornado, 602 housing units suffered partial or semi-major damage while 3,422 units were completely damaged or destroyed. In addition over 3,000 homes suffered some form of damage, thus a total of over 7,000 homes were damaged by the May 2011 tornado. Residents of some of these destroyed units were able to find replacement housing among Joplin's existing housing stock or repair their homes. In order to determine the number and type of units that need to be replaced, we utilize the 3,422 units that were completely damaged or destroyed as a starting point. First, we determine the number of rental units and the number of owner-occupied units that need to be replaced. Based upon the renter percentage in the most densely populated areas that were damaged by the tornado, as

illustrated on page 57, we assume that approximately 45 percent of the units destroyed were rental units.

Number of units that were completely destroyed or damaged 3,422
*
Percentage of units that were rental units 45.0%
=Total Number of Replacement Rental Units Proposed 1,540

Number of units that were completely destroyed or damaged 3,422
*
Percentage of units that were owner-occupied units 55.0%
=Total Number of Replacement Owner-Occupied Units Proposed 1,882

We assume that residents in approximately ten percent of the 3,422 units found other replacement housing among Joplin's existing housing stock or chose to repair/rebuild their homes. As a result, we recommend the replacement of 1,400 rental units and 1,700 owner-occupied units for a total of 3,100 units. The 1,700 owner-occupied units should contain a small percentage of condominium units through newly developed mixed-use developments and mostly single-family homes. These homes need to be priced at a variety of price points including homes for low to moderate income households that are priced at $95,000 or less.

Given that approximately 40 percent of households overall (both renter and home-owner) whose homes were damaged by the tornado were low to moderate income households, it is expected that a slightly lower percentage of home-owners were low to moderate income since it is often difficult for low to moderate income families to come up with down payment money for a home. As such, around 30 to 35 percent of owners have low to moderate incomes, which results in the need for 525 to 550 affordable homes. If 525 to 550 homes are built and priced at $95,000 or below, there should be an adequate amount of affordable owner-occupied homes to replace the destroyed units.

For the 1,400 rental units, we recommend a combination of market rate single-family homes, market rate traditional multifamily developments and affordable developments. To determine the number of affordable units that should be built, we have relied upon the percentage of low to moderate income households in the most densely populated areas that were damaged by the tornado, illustrated on page 41, and we assume that approximately 40 percent of households would qualify to live in affordable rental housing.

Number of proposed replacement rental units 1,400
*
Percentage of households that are low to moderate income 40.0%
= Total Number of Replacement Affordable Rental Units Proposed 560

As the above table illustrates, approximately 560 out of the 1,400 rental units should be affordable units that target low to moderate income households. The remaining 840 unit should be traditional market rate units. Of the 560 affordable units, we recommend that

approximately 70 percent of these units should be traditional multifamily housing and 30 percent should be single-family rental homes. For the 840 market rate units, we recommend that the majority of these units should be traditional multifamily housing since single-family homes are not typically built to be permanent rentals.

Action:

- Replace market rate multifamily apartments that were destroyed by building approximately 840 new market rate units, most of which are traditional multifamily apartments.
- Build approximately 1,700 new single-family homes in the areas that were heavily damaged by the tornado including single-family homes priced at $95,000 or below to attract low to moderate income households.
- Build approximately 560 new units of affordable housing including a combination of single-family rental homes and traditional multifamily apartments.

INFRASTRUCTURE IMPACT AND UNMET NEEDS

An assessment of public infrastructure and infrastructure systems that were damaged due to the May 22nd tornado was performed by the City's Public Works Department with the initial FEMA assistance was considered. The three main infrastructure elements that need additional assistance at this point are Sidewalks, Trails, and Trees.

The assessment for damaged sidewalks resulted in a conservative estimate need of $2,500,000. The City did receive $117, 897 from FEMA for Sidewalk repair; however, the budget for this item remains at $2,500,000 to include a small amount for contingencies.

An important goal that was a result of the CART process was to incorporate more trails for the purpose of alternative forms of transportation. The City will use the construction of sidewalks along with the construction of trails to provide a safe means of transportation. The aim of this project will be to ensure that people of all income levels have access to the resources of the community through linking the damaged neighborhoods to each other and to the commercial and cultural resources of the City. The initial estimates for restoring trails in Parr Hill and Campbell Parks as well as adding connections from these parks to other resources totaled approximately $2,200,000.

Joplin lost between 15,000 and 20,000 trees according to the Missouri Department of Conservation sponsored task force which evaluated the loss soon after the disaster. Those trees were a hodgepodge variety of species which more or less acted effectively as shade trees and wind-blocks, acted as traffic calming measures and reduced street maintenance.

Expected costs can be about $15/tree/month for a minimum of 5 months/year, or $150/tree. Such companies expect to be hired to plant the tree to ensure accordance with planting standards, about $100/tree. So each tree costs, with all tallied, about $350. The proposed CDBG funds would provide funds for approximately 6,333 ROW trees. This amount is estimated to be the excess need after all current funds and donations are considered. These numbers do not include

trees that people go out and buy themselves.

ECONOMIC IMPACT AND UNMET NEEDS

The path of the May 22, 2011 tornado also crossed a few of the commercial corridors in the City of Joplin which had a large effect on the local economy. There were 553 businesses destroyed or severely damaged, but approximately 85 percent, or 446 businesses, percent are back in operation. Thirty-nine businesses have indicated that they will not rebuild/reopen, and 21 new businesses have opened in the area.

Between 4,500 and 5,000 employees were affected by the tornado but over 90 percent of jobs have been regained, which is partially attributable to the fact that many jobs were at major employers such as the hospitals and Wal-Mart, which have decided to rebuild. Overall, the local economy is fairly strong although smaller businesses are still struggling. The large number of volunteers, resources, and support has helped increase spending in the area and sales tax revenue is up 14 percent compared to a year ago. Future revenue will depend on how long the rebuilding will take and continued development of Joplin. Although the short-term sales tax revenue has prospered due to rebuilding activity, it will be important to introduce more diverse revenue sources back into the community that will ensure that revenues will remain after the rebuilding activities subside.

Certain areas, such as those along Range Line Road and near Mercy Hospital, have experienced more rapid development for retail and businesses whereas other areas, such as that along 20th Street, have been slower to rebuild. It will be important to try to provide resources to ensure that the rest of the economic recovery is attained. Because of the slow development of smaller business and all businesses along certain corridors, it seems evident that stimulus will be needed to help recover economically. This will help bring the employment level back to the pre-tornado levels as well as provide important resources for the residents.

ASSISTANCE EXPECTED/RECEIVED

The Federal Emergency Management Agency (FEMA) has been present in Joplin since the beginning of the rescue operations and continues into the recovery process. The Housing Assistance that FEMA has provided to residents of Joplin to this point has reached $7,995,703 for Rental Assistance, Home Repair, and/or Replacements funds. These funds have assisted 2,979 households.

FEMA Assistance (as of May 7, 2012):

Individuals and Businesses:

- Nearly **$21 million** in grants has been approved in Jasper and Newton counties for home repairs, temporary housing and other critical disaster-related needs through the Individuals and Households Program.
- FEMA also is providing temporary housing units for individuals and families who have not yet been able to move into a more permanent housing option. These units are disbursed among 12 pre-existing commercial sites and three community sites that were

built specifically to temporarily house tornado survivors. At the peak of this housing effort, 586 individuals and families were provided a temporary home among one of these sites.

- FEMA approved an Immediate Services Program grant for more than $1.5 million to the Missouri Department of Mental Health for crisis counseling services for survivors of the severe storms, flooding and tornadoes. Of that, more than $1.4 million was provided to Ozark Access Crisis Intervention (ACI) hotline for Jasper and Newton counties.
- The U.S. Small Business Administration (SBA) provides low-interest disaster loans to individuals and businesses of all sizes to help with eligible, disaster-related needs. To date, SBA has approved more than $40.8 million for 516 tornado-impacted individuals, businesses and non-profits.
    - 416 low-interest disaster loans to homeowners for $26.7 million
    - 96 low-interest disaster loans to businesses for $13.9 million
    - 4 low-interest disaster loans to non-profits for $256,400

FEMA provides grants to local, state and federal governmental entities, Tribal nations and certain not-for-profit organizations to help reimburse eligible costs to remove debris, provide emergency protective measures and to repair or replace damaged public infrastructure and facilities. In Jasper and Newton counties, nearly **$150 million*** in federal money has been obligated on behalf of **25 applicants** such as local governments, school districts and critical facilities for **351 projects** to remove debris, provide emergency protective measures and to repair or replace damaged public infrastructure and facilities.

** Funding subject to change based on eligibility review process and potential insurance proceeds.*

Insurance Statistics

Losses as of April 30, 2012:

Provided by Missouri Department of Insurance, Financial Institutions, and Professional Registration

Losses as of April 30th, 2012

Line of Business	Claims Received	Claims Expected	Losses Paid	Losses Incurred	Percent
Commercial Property	2,063	2,087	$850,049,017	$1,228,746,672	69%
Residential Property	8,564	8,736	$520,281,192	$552,073,887	94%
Commercial Auto	313	315	$4,412,659	$4,765,428	93%
Private Auto	6,806	6,949	$47,596,261	$51,153,034	93%
Other Commercial	300	304	$13,883,055	$19,301,460	72%
Total (Excluding County Mutuals)	**18,046**	**18,391**	**$1,436,222,184**	**$1,856,040,480**	**77%**
County Mutuals	1,477	1,516	$61,789,887	$67,876,781	91.0%
Total	**19,523**	**19,907**	**1,498,012,071**	**1,923,917,261**	**77.9%**

UNMET NEED SUMMARY

The initial single family housing need estimate of 1,700 units when compared to the approximate 700 single family units that have been permitted leaves an unmet need to assist the construction of approximately 1,000 single family homes. This will be addressed by the planned Direct Homeownership Assistance and Land Assemblage programs.

While the permit data indicated the majority of construction activity occurred with rehabilitation activities, there are still cases that are in process through non-profit agencies that approximate the need for a minimum of 100 houses with remaining need. The assessment for this need will be ongoing. This is addressed in The Single Family Rehabilitation activity.

The infrastructure activities revealed an unmet need that is estimated at $2,500,000 for sidewalks after reimbursement from FEMA. The need for additional trail access as a means of transportation for those residents living in the tornado-affected is estimated at this point to be $2,000,000 to effectively connect this returning population with the unaffected portions of the City which will help provide resources for these residents.

Thirty-nine businesses have indicated that they will not rebuild/reopen, and 21 new businesses have opened in the area. This leaves a remaining need to replace the economic effects of 18 businesses. Although the exact number of jobs and tax revenue is not noted at this time, the effort to replace a portion of this will be made through the proposed SPARK plan.

II. PLANNING EFFORTS

LAND USE PLANS FOR MITIGATION

Land use plans and decisions cannot be made to mitigate risk of future tornado damage due to their lack of causation based on geographic location. Where a flood can generally be tied to a floodplain or at least proximity to a water source, tornadoes may strike any location. Joplin, however, does realize the need to use this opportunity provided by the May 22nd tornado to re-evaluate land uses that occur in other hazard prone areas such as flood plains. Joplin has taken steps in the form of educating the public, working with other public entities, and has even begun the processes for application of Hazard Mitigation Grant Program funds to purchase property and ensure a more suitable land use is achieved.

During the Citizens Advisory Recovery Team process, a large outcome of these public participation forums was the desire for trails and green-spaces. These forums became a great tool to educate the public with the ideas that placement of green-spaces and potential trails were ideal for floodplain areas. The placement of floodplains in Joplin has been utilized to co-locate parks in the past and the idea of extending the system along these areas was heavily promoted both by the citizens and to the citizens during this process.

The other tangible example is the relocation of the Joplin High School and Franklin Technology Center. Although these educational institutions will occupy the same general location, property acquisition along the perimeter allowed for better site planning ensuring that the structures are not located in the floodplain that is located on the property. The previous high school placement was directly in the floodplain.

COORDINATED PLANNING

Joplin had the advantage of being offered assistance through FEMA's Emergency Support Function 14, Long Term Community Recovery. In Joplin, this process culminated in the form of the Citizens Advisory Recovery Team (CART). This was a volunteer advisory board composed of local leaders from all sectors of the community. The importance of the CART was that it was a citizen driven process that resulted in a list of recovery projects that was presented to the appropriate governmental/elected boards.

All of the projects that are included in this Action Plan are either taken directly from the CART Next Steps plan or are a derivation of projects suggested in that plan. These recommended projects were the result of numerous Town Hall meetings, public-comment booths at community events, a CART website using virtual town-hall technology, and the numerous sub-committee meetings of citizen volunteers with passion in the areas of: Economic Development, Schools and Public Facilities, Housing and Neighborhoods, and Infrastructure and Environment.

The CART Next Steps plan has been and is continuously being implemented through many different avenues. One of the most important local and regional planning efforts that built on the success of the CART plan is Joplin's Comprehensive Plan. The City of Joplin was due for a

Comprehensive Plan update shortly after the May 22nd tornado and used the CART process as a springboard to ensure that it's new comprehensive plan effectively used the opportunities presented by the tragedy as well as respecting the efforts of the citizens that were put forth in the CART plan.

City staff attempted to incorporate as many goals of the CART plan into the Comprehensive Plan as possible. The two documents, although separate, are completely complimentary and coordinated. The projects presented in this Action Plan were born in the CART process and further refined in the Comprehensive Planning process. This process included more citizen participation with general public meetings, sessions with the Planning & Zoning Commission, and sessions with the Joplin City Council.

LEVERAGING OF FUNDS

The City has hired Wallace Bajjali as a Master Developer to help coordinate the City's recovery. The City's CDBG-DR funds will be just one small funding stream that Wallace Bajjali will be incorporating into the recovery projects for the community. It is still the intention of the City of Joplin to procure a separate firm to administer and ensure compliance specifically for the CDBG-DR funds. The following table illustrates the potential for funds being leveraged in the proposed activities for this Action Plan.

Project	Total	CDBG
	$ in millions	
Joplin Redevelopment Corporation—Land Banking	30.00	8.00
Housing Reconstruction:		
Principal Reduction Program / Affordable Housing	40.00	4.50
Market-rate Single Family	162.50	8.25
Affordable Multi-Family	18.78	4.50
Market-rate Multi-Family	36.60	4.50
Single Family Rehabilitation		1.50
Neighborhood Revitalization—Walk/Bike Trails, etc.		6.50
SPARK—Performing / Visual Arts center, Depot renovation	68.00	5.39
Salvation Army Transitional-living Program	1.50	
Downtown education complex [current library site]	72.50	
Allocation for Administration		2.12
Totals	429.88	45.26

USE OF QUALITY CONSTRUCTION METHODS

The City of Joplin currently operates under the International Building Code (IBC) of 2006 and is in the process of evaluating the update for IBC 2012. It is the normal practice of the City to update its standards every 6 years. In addition to evaluating the update for IBC 2012, the City of Joplin made a few additions to its effective code as a result of the May 22nd Tornado. These measures include the mandatory use of "Hurricane Straps" used to make a stronger connection between all elements of the residential building from the foundation to the roof. The second addition was the mandatory filling of cells in the concrete block foundations at a higher frequency than previously allowed under the City's code.

ADEQUATE (& FLOOD RESISTANT) HOUSING FOR ALL INCOMES

A majority of the CDBG-DR funds in this Action Plan are proposed to promote housing to fulfill the need created by the May 22nd Tornado. All of these programs will follow environmental regulations and current city building codes in relation to issues of the flood plain. This Action Plan has dedicated funds to assist affordable housing units as well as market rate housing units. This assistance will also be distributed to home ownership units as well as rental units. These activities will promote affordable housing dispersed throughout the community which will include areas that are low poverty and non-minority areas. Some of the proposed Multi-family activities will also allow for and promote the development of mixed-income developments.

With the investment in affordable rental units, the aim is to provide assistance to those at the lowest end of the income scale to provide housing opportunity. For those individuals that do not have income sources that allow them to find housing and are homeless, the City of Joplin has and will continue to participate in the local Continuum of Care process. The City of Joplin provides annual funds to allow the management of a Homeless Management Information System (HMIS). This system will help indicate if more resources are needed for the homeless population in the community.

The City of Joplin has made attempts through a local Housing Task Force as well as the CART's Housing and Neighborhood Sector to constantly evaluate the housing needs of the community. This includes the Special Needs population that can require more resources and attention when recovering from a disaster. These committees have included local agencies and will continue to gain input from agencies such as The Independent Living Center and Community Support Services.

PLANS TO MINIMIZE DISPLACEMENT

It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 FRF 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG program.

III. PROGRAMATIC PROCEDURES

HOW WILL PROGRAM INCOME BE USED

The City of Joplin reserves the right to utilize up to 5% of Program Income received from these CDBG-DR activities as additional Administrative funds. Program Income will roll back into the project from which it is originated unless otherwise amended. Program Income is expected from the Land Assemblage activity. The Program Income generated from this activity will be used to create a Revolving Loan Fund to contribute to a variety of projects that would need additional land purchasing.

MONITORING STANDARDS AND PROCEDURES

Non-duplication of benefits

Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C. 5155), as amended, prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster as to which that person has received financial assistance under any other program or from insurance or from any other source. CDBG disaster recovery funds will not be used for activities for which funds have been received (or will be received) from FEMA; the SBA; other local, state, or federal programs; insurance; or recovery support from private charity organizations. However, CDBG funds may be used to provide assistance to the extent that a disaster recovery need has not been met by other sources. Applicants for assistance will be required to disclose all sources of assistance received or to be received.

FEMA, SBA, and other federal agencies will be asked to provide verification of benefits supplied to all applicants that are involved in the programs funded by CDBG-DR funds.

Continual Quality Assurance

All recipients of CDBG-DR funding will be subject to monitoring conducted by both the City of Joplin Staff and any administering agents hired by the City of Joplin. The City of Joplin plans to hire a consulting firm with extensive experience in administering CDBG-DR funds which will include a proven monitoring process bases on all applicable regulations. In the case that monitoring is needed before an external firm can be hired, the internal audit function outlined below will be applicable to any and all programs included in this Action Plan as deemed necessary by City of Joplin staff.

Internal Audit Function w/ responsible Audit staff

The CDBG Program staff will be in contact with subrecipients of the program, according to the terms of their Subrecipient Agreements, to track progress of compliance issues and ensure timeliness. On-site monitoring visits will be conducted according to the nature and scope of the

project. Forms to verify LMI participation and/or benefit are collected based on the scope of each project.

SCHEDULE OF EVENTS – The usual schedule of events for CDBG monitoring visits will be as follows:

1. The CDBG Program Specialist schedules the monitoring visit by phone or e-mail contact with the subrecipient.
2. The on-site monitoring visit is conducted, and consists of the following:
   a. Conference
   b. Documentation, data gathering and analysis

A letter is sent to the subrecipient regarding the monitoring visit. The letter includes information about any problems discovered or discussed during the monitoring visit, as well as information that recognize the successes of the subrecipient. If the CDBG Program staff deems necessary, requests may be made of the subrecipient to ensure compliance with all applicable rules and regulations of the program.

STEPS TO PREVENT FRAUD

All activities must be conducted in compliance with applicable CDBG rules and regulations, as well as other applicable federal regulations such as OMB Circulars A-87, A-133, and 24 CFR Part 85 (Uniform Administrative Requirements). Subrecipients who have received $500,000 or more in federal funding during the preceding year will be required to submit an audit in accordance with OMB Circular A-133.

Efforts to mitigate fraud, abuse, and mismanagement include regular monitoring of activities, as described. The City of Joplin, or other entity as assigned by the City of Joplin, will review expenditures, while independent auditors will audit activities for program and financial compliance. The City of Joplin reserves the right to take appropriate action in instances of non-compliance, fraud, and mismanagement including, but not limited to, disallowing ineligible costs, terminating contracts/agreements, and requiring repayment of funds.

As required under the Notice, the City of Joplin, or its assigned agent, will submit quarterly reports to HUD through the Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following each calendar quarter.

INCREASING CAPACITY OF THOSE ADMINISTERING ACTIVITIES

The vast majority of Administration funds available under the CDBG-DR program will be made available to the firm that is hired to administer the entire CDBG-DR program for the City of Joplin. This organization that is chosen to administer grants will be encouraged to use funds to attend trainings that will increase the efficiency with which projects are completed.

Private funds will be provided as they become available through the Master Developer partnership to help further the capacity of administering organizations. The Master Developer

team will also be encouraged by the City of Joplin to collaborate and assist programs administration to ensure that the recovery effort is a coordinated effort.

The City of Joplin has received funds from the Economic Development Administration to hire a staff planner. The Disaster Planner (EDA position) will also be dedicated to providing assistance to recovery efforts which will include the projects that are funded by the CDBG-DR funds. This additional assistance to administering groups will increase the capacity of all groups involved.

SUBSTANTIAL AMMENDMENT

The following events will be considered substantial amendments to the Action Plan for Disaster Recovery:

- The addition or deletion of any activity described in the Plan;
- A change in the planned beneficiaries of an activity, and
- A change to the scope of the project that would result in the allocation or reallocation of more than $1,000,000.

Substantial amendments must be approved by the Joplin City Council. For substantial amendments, Joplin will post the amendment on its web-page and receive comments for 7 days. Following the public notice period, proposed amendments will then be submitted to the HUD Kansas City Field Office for review. For minor amendments, the City of Joplin will simply notify the Kansas City Field Office and update projects within the DRGR system. Finalized minor amendments will be posted on the City's website.

CONNECTION BETWEEN UNMET NEEDS AND ALLOCATION

The three categories of Housing, Infrastructure, and Economic Need were individually discussed at the beginning of this document. The City evaluated the needs in these three categories and determined the greatest amount of need to be in Housing followed by Infrastructure then Economic Need. The City does strongly believe, however, that if the recovery of one of these sectors occurred in an isolated way, the community would not have a healthy recovery.

The current proposed budget includes an emphasis on housing activities as that is the largest unmet need at the time of this initial plan. The numbers of single and multi-family units needed were closely considered when making the allocation to these activities.

The City's Public Works Department created an update as of July 1, 2012 as to the unmet need for infrastructure repairs as a result of the tornado. The amount allocated to these activities will ensure that the residents have a quality level of service when they return to the damaged area.

The City, through the Joplin Area Chamber of Commerce, has closely monitored the economic recovery of the community. The small amount of funds allocated to these types of activity do not reflect the overall unmet need, but rather reflect the stronger need for housing recovery. The need to ensure that adequate and appropriate employment is available to residents will continue to be evaluated for future amendments to this plan.

IV. PROGRAM DESCRIPTIONS

SIDEWALK CONSTRUCTION AND RECONSTRUCTION

How the Assessment informed allocation

An existing conditions report was completed by the City of Joplin's Engineering Department to assess the infrastructure that has been damaged as a result of the May 22, 2011 tornado. These items have been prioritized based on importance and cost. The amount of FEMA funds designated to repairing infrastructure was compared to the comprehensive needs established in this survey. The shortfall that was a result of that comparison informed the allocation for the need for sidewalk

CDBG Eligibility and National Objective

This Activity is eligible under 03L, Sidewalk Improvements, and will utilize the National Objectives of both Low-Moderate Income Area and Urgent Need. In neighborhoods where the census data indicates the Census Block Groups are eligible to receive LMA assistance, this will be used. For those areas that will not qualify under that National Objective, Urgent Need will be used based on the impediment to public health and safety that inadequate and dangerous sidewalk infrastructure can cause and/or the Slum and Blight Area national objective.

Long-term Recovery from Specific Disaster

This program will greatly improve the recovery of neighborhoods throughout the City through providing amenities and pedestrian safety. This project will look at both reconstructing sidewalks in neighborhoods that had them prior to the storm as well as adding them in neighborhoods that did not originally have them. This additional need was brought about in the CART process as residents have requested the ability to have sidewalks available as modes of transportation and as measures of safety as the community desires to use alternative modes of transportation such as walking.

Criteria used to select applications

Applications will not be needed for this program. The priorities of projects will all be decided administratively by the Public Works Department.

TRAIL CONSTRUCTION/RECONSTRUCTION

How the Assessment informed allocation

In another attempt to create suitable and attractive neighborhoods for residents to return, the community through the CART process has asked for an expansion of the current trail opportunities throughout the community and especially throughout the tornado damaged area. The need that surfaced was that there should be a connection of the existing trails along Campbell Parkway southwest through the damaged area to connect ultimately to the trails system near Wildcat Glades Nature Center.

CDBG Eligibility and National Objective

This Activity is eligible under 03, Other Public Facilities and Improvements, and will utilize the National Objective of Urgent Need. Urgent Need will be used based on the impediment to public health and safety that inadequate and dangerous pedestrian infrastructure can cause. If

necessary, the National Objective of Slum and Blight Area may also be used if the City decides to declare the area one of Slum and Blight. Both of these objectives will result in contributing to the recovery of housing through improving the neighborhoods in which people will return.

Long-term Recovery from Specific Disaster
The allocation to this activity will not fund all of the combined on and off-road trail necessities to make this happen, but will make an important stride in providing the alternative transportation method for residents. This is especially necessary for the City's recovery as it will provide a transportation alternative to low-income residents and other residents that need affordable transportation for work and services.

This program will greatly improve the recovery of neighborhoods throughout the City through providing amenities and pedestrian safety. Similar to the Sidewalk demand, the need for trails was brought about in the CART process as residents have requested the ability to have trails available as modes of transportation and as measures of safety as the community desires to use alternative modes of transportation such as walking.

Criteria used to select applications
Applications will not be needed for this program. The priorities of projects will all be decided administratively by the Public Works Department.

TREE PLANTING

How the Assessment informed allocation
After the tornado, the damage to the built environment was evident and publicized. The community quickly realized that it also lost a large part of its natural environment in the urbanized setting, its trees. The City has been provided a Community Forestry Recovery Coordinator by the Missouri Department of Conservation. The following assessment was completed by that individual.

Joplin lost between 15,000 and 20,000 trees according to the Missouri Department of Conservation sponsored task force which evaluated the loss soon after the disaster. Those trees were a variety of species which more or less acted effectively as shade trees and wind-blocks, acted as traffic calming measures and reduced street maintenance.

Cost of an initial tree planting can be regulated by the size of the initial planting, the size of the new saplings, and the availability of the species listed in the plantings. According to our present ordinance, we can plant 1 shade tree on each side of the street/block due to the need to leave the sight triangle of each intersection free from obstruction. If we make changes to the code and allow tree planting to start at 40 ft. from the corner, as many cities do, we can plant 8 shade trees each side/block, amounting to $6,400 initially effectively making it a tree-lined cityscape. This is a simple example, a fleshed out plan will show some variety, perhaps suggested by present utilities.

This projection assumes concordance with changes that can allow us to follow the CART recommendation that we develop sustainability of the urban forest and address the loss of trees

after the tornado event of 2011. 7,144 variable sized trees have been donated and planted in City parks and neighborhoods to date and an additional 2,414 this spring. Our projected outcome is to replace approximately 15,000 trees lost to the storm. We can expect about 1,523 more donated trees; therefore, we project planting 6,333 ROW trees. These numbers do not include trees that people go out and buy themselves.

Expected cost of a wholesale tree	$ 82
Cost of planting a tree	$116
Cost of 2 year establishment	$124
Establishing each tree	$322
Establishing 6,333 ROW trees	$2,039,226

CDBG Eligibility and National Objective

This Activity is eligible under 03N, Tree Planting, and will utilize the National Objective of Low and Moderate Income Area and Urgent Need. In neighborhoods where the census data indicates the Census Block Groups are eligible to receive LMA assistance, this will be used. For those areas that will not qualify under that National Objective, Urgent Need will be used based on the impediment to public health and safety citing the numerous benefits to public health that will be gained through this activity. The City may also choose to use the Slum and Blight national objective, if the tornado area is designated a Slum and Blight area.

Long-term Recovery from Specific Disaster

This program will greatly improve the recovery of neighborhoods throughout the City through providing a healthier living environment for residents. Similar to the Sidewalk demand, the need for trees was brought about in the CART process as residents have requested the ability to recover the natural environment that infiltrated the urban landscape prior to the tornado.

Criteria used to select applications

Applications will not be needed for this program. The priorities of projects will all be decided administratively by the Public Works Department.

SINGLE-FAMILY DIRECT HOMEOWNERSHIP ASSISTANCE

How the Assessment informed allocation

The City of Joplin has commissioned a Housing Study that was discussed in the Housing Impact section of this plan. This is the main means by which the City has been able to gauge the need for housing throughout the community. The study along with constant monitoring of building activity through building permits has allowed the City to develop both the single and multi-family programs described in this Action Plan. This project specifically aims to provide direct home-ownership assistance to approximately 1,700 households.

CDBG Eligibility and National Objective

This Activity is eligible under 13, Direct Homeownership Assistance, and will utilize the National Objectives of both Low-Moderate Income Housing and Urgent Need. For households that will not qualify under the Low-Moderate Income National Objective, Urgent Need will be used based on the clear need for housing and all income levels established in the City's studies.

Long-term Recovery from Specific Disaster
The objective of this project is to provide attractive housing with a monthly payment that is affordable for low and middle income families, either for those displaced from the area or new residents bringing a new vitality and population diversity to the neighborhood. The residential rebuilding program will represent a "showcase" project for recovering from the devastating tornado of May 22, 2011.

This project will be used in conjunction with the Land Assemblage activity to ensure that the bottom-line mortgage of households is brought to an affordable level. As a major part of the overall rebuilding effort, the City of Joplin, and Wallace Bajjali as the Master Redeveloper, will bring to bear a variety of financing sources for this project and for overall neighborhood redevelopment [see below], including takeout financing commitments from lenders active in the local market and down payment assistance for moderate-income buyers. All of these, taken together, will enhance the marketability of the project and support the goal of creating a high-quality, affordable neighborhood. The down payment assistance will be the portion funded by this CDBG grant. The following is an example of what the structure of financing may look like:

Example for the home buyer at an average construction price of $100,000

1) Equity Capital/Down Payment from Buyer:	$	5,000
2) Forgivable Debt to Equity Capital (MHTC):	$	10,000
3) Community Development Block Grant Money:	$	11,250
4) TSA Gran Funding:	$	8,750
5) Conventional Senior debt with takeout:	$	65,000
	$	100,000

Criteria used to select applications
Applications will be accepted from individuals for this program based on their ability to qualify for the necessary financing. Application to administer this program will not be accepted at this time. The City will properly procure any services that may be needed to help administer the program.

MIXED INCOME MULTI-FAMIY RESIDENTIAL

How the Assessment informed allocation
The Housing Study along with constant monitoring of building activity through building permits has allowed the City to develop both the single and multi-family programs described in this Action Plan. The need for rental resources was apparent through the Census data that was analyzed in the housing study. The City also realizes that there is a high potential for previous homeowners that were either under-insured or uninsured will be faced with the need to convert to becoming renters.

CDBG Eligibility and National Objective
This Activity is eligible under 13, Direct Homeownership Assistance, and will utilize the National Objectives of both Low-Moderate Income Housing and Urgent Need. For households that will not qualify under the Low-Moderate Income National Objective, Urgent Need will be used based on the clear need for housing and all income levels established in the City's studies.

Long-term Recovery from Specific Disaster
This project specifically aims to provide housing opportunities that integrate households of various income levels into multi-family developments. This funding is specifically proposed to fund infrastructure costs associated with and estimated total of 500 units. Of these 500 units, at least 255 units will be rented to households that meet the criteria for a low-moderate income household. Providing these rental resources will allow a subset of the population that may not have the resources to achieve home-ownership, even with the proposed Direct Homeownership Assistance program, the ability to return to Joplin and specifically to the tornado affected area. The rental market in Joplin has been a large part of the housing sector and to have a healthy recovery, it will be essential to include assistance for this type of development.

Criteria used to select applications
Application to administer this program will not be accepted at this time. The City will properly procure any services that may be needed to help administer the program.

SINGLE-FAMILY REHABILITATION

How the Assessment informed allocation
The City of Joplin has commissioned a Housing Study that was discussed in the Housing Impact section of this plan. This is the main means by which the City has been able to gauge the need for housing throughout the community. The study along with constant monitoring of building activity through building permits has allowed the City to observe that a large portion of needed rehabilitation has been occurring. The City believes that, based on permit information, there is still a need to support ongoing Single Family rehabilitation. This project specifically has potential to provide assistance to 100 homes at an average rehabilitation of $25,000.

CDBG Eligibility and National Objective
This Activity is eligible under 13, Direct Homeownership Assistance, and will utilize the National Objectives of both Low-Moderate Income Housing and Urgent Need. For households that will not qualify under the Low-Moderate Income National Objective, Urgent Need will be used based on the clear need for housing and all income levels established in the City's studies.

Long-term Recovery from Specific Disaster
The long-term benefit gained from this project will result in the creation of more habitable residential properties to meet the housing needs that have been discussed previously in this document.

Criteria used to select applications
The City will release the means for individual home-owners to apply for this assistance at a later time. A managing organization has not been identified for this activity at this point and proper procurement procedures will be followed in the selection of a management organization.

LAND ACQUISITION/ASSEMBLAGE

How the Assessment informed allocation
Land assemblage will help further the redevelopment goals for both residential and commercial projects. The need to redevelop the vacant properties is apparent from the fact that 3,500 residential properties will need to be completely redeveloped due to the tornado.

Threshold factors and grant size limits
The estimated cost for lost is $15,000 which is based on market data that averages residential and commercial properties for a total of approximately 500 lots to acquire.

CDBG Eligibility and National Objective
The eligibility of this activity is under 01, Acquisition of Real Property, and the primary national objective for this project will be Urgent Need. This will serve the purpose of securing lots that could otherwise become vacant and endanger the public and will also help provide incentive to address the urgent needs of residential redevelopment to serve the citizens of Joplin.

How will programs help long-term recovery from specific disaster
The Joplin Redevelopment Corporation (a Missouri 353 Corporation) will be used to acquire various parcels of land in the EDR. Properties acquired by the Joplin Redevelopment Corporation would then be sold to prospective homeowners to rebuild in the community. All net proceeds resulting from the sale of land will be used to create a Revolving Loan Fund for the purchasing of additional land within the city limits for the same purpose.

By serving as a ready cash buyer, the Land Bank can acquire larger blocs of land at attractive prices, which can then be resold to returning or relocating homeowners or businesses at prices enabling them to rebuild cost-effectively. With a larger inventory of land and a support team of service providers (such as homeowner financial assistance programs, appraisers, title companies and mortgage lenders), the process of buying land from the Land Bank can be expedited, allowing the rebuilding process to proceed more quickly and efficiently. This supports the city's goal to "build back better", fosters the sense of community which has developed after the disaster, and increases the chances for local business to locate successfully in the neighborhood.

Criteria used to select applications
The City will release the means for individual home-owners to apply for this assistance at a later time. A managing organization has not been identified for this activity at this point and proper procurement procedures will be followed in the selection of a management organization.

FEMA Temporary Housing Unit Relocation

How the Assessment informed allocation
The City of Joplin has continually worked with a group of local, state, and national housing partners since the May 22, 2011 tornado called the Housing Task Force. One major component of this group was tracking and assisting the transition of households out of the FEMA Temporary Housing Units into more permanent housing situations. FEMA will no longer be offering its Temporary Housing Unit (THU) program after the first week of June 2013. With this deadline in sight, the Housing Task Force has identified approximately 11 potential households that are currently housed in the THUs and would be assisted by being provided more time in the THUs at a better location.

The group has identified a local non-profit that will receive the donated THUs and operate them as temporary housing for these homeless individuals. The non-profit, Catholic Charities, will also provide social services to these households and assist them in finding more permanent

housing. The THUs will be operated as temporary transitional housing with affordable rents capped according to the household's income.

CDBG Eligibility and National Objective
This Activity is eligible under 570.201(d) as Clearance and Remediation, and will utilize the National Objectives of Low and Moderate Income Clientele with a Presumed Benefit to Homeless Households.

Long-term Recovery from Specific Disaster
The long-term benefit gained from this project will result in the placing of homeless households into more permanent housing with assistance to locate permanent housing.

Criteria used to select applications
The City will work with FEMA and Catholic Charities to identify those households that are still eligible to remain in the housing units and are a good fit for the program.

SPARK – PERFORMING AND VISUAL ARTS CENTER

How the Assessment informed allocation
The need that is addressed by this project is the need for economic recovery in the community. Through job creation and the introduction of increased economic activity in a Slum and Blight Area, the choice to include the SPARK plan was informed by the need to fill the need to recover those businesses that have decided to not return to Joplin.

CDBG Eligibility and National Objective
The eligibility of this project is under 03, Other Public Facilities/Improvements, and the primary national objective for this project will be the elimination of a Slum and Blight Area.

Long-term recovery from specific disaster
This activity will include the rehabilitation of the Historic Joplin Union Depot and converting it into a performing and visual arts center. This new center will be a driving force in the community to attract economic activity through tourism. Employment will also be a benefit gained from adding this resource to the downtown area. Plans for the Union Depot have continuously arisen in recent years and interest was once again renewed as the CART looked at ways to accelerate the Economic Recovery of the community through enhanced community facilities.

Criteria used to select applications
Applications will not be needed for this program. The priorities of projects will all be decided administratively by the Public Works Department.

JOPLIN HOUSING AUTHORITY TENANT BASED RENTAL ASSISTANCE

How the assessment informed allocation
As a result of the May, 2011 tornado, Joplin's housing stock including its Section 8 voucher program, was severely impacted. In regards to the Section 8 program, 85 voucher-holders were displaced. Since the tornado, new housing units have gradually been added to Joplin's inventor; however many of these are more costly as Joplin's rental market evolves. Compounding the

issue, during its recovery, the Joplin Housing Authority experienced a decrease in its "fundable" voucher population due to the lack of available units. As a result of this decrease, the voucher budge provided to the City also decrease, despite the needs of additional households that were displaced.

Therefore, HUD through the Community Development Block Grant Program – Disaster Recovery and through the Public and Indian Housing Program have granted waivers to allow CDBG-DR funds to assist Joplin's Housing Authority restore its program to reach pre-disaster voucher levels. Tenant-based rental assistance will be assisted with a maximum of $290,000.00 in CDBG-DR funds within a two year period.

CDBG Eligibility and National Objective
This Activity is eligible under 570.207(4) as waived (Income Payments), and will utilize the National Objectives of Low and Moderate Income Clientele.

Long-term Recovery from Specific Disaster
The long-term benefit gained from this project will result in the restoration of Section 8 voucher-holders at pre-tornado levels.

Criteria used to select applications
The Joplin Housing Authority will determine eligibility of low-income households that would benefit from the Section 8 Voucher Program, assuring rental affordability.

JOPLIN HOUSING AUTHORITY SITE IMPROVEMENTS REPAIR

How the assessment informed allocation
Due to tornado damage and subsequent damage and wear and tear from heavy trucks and equipment used in the clean-up effort which included demolition, construction and repair of utilities, several Joplin Housing Authority parking lots were damaged as well as damage to the parking lot of their temporary office location at 424 S Turk Street. Costs to repair and/or overlay were not covered by FEMA, insurance or other funding sources. Additionally, yards and trees at Joplin Housing Authority's housing sites were damaged. These repairs are central to the viability and livable of the affordable rental housing units as well as access to the Housing Authority's temporary office where they accept applicants. Therefore, up to $210,000 will be available in Community Development Block Grant Program – Disaster Recovery funds to make the necessary repairs.

CDBG Eligibility and National Objective
This Activity is eligible under 570.202(a)(2) as Rehabilitation and Preservation, and will utilize the National Objectives of Low and Moderate Income Clientele.

Long-term Recovery from Specific Disaster
The long-term benefit gained from this project will result in the continued viability of existing public housing units by improving parking and landscaping associated with the units.

Criteria used to select applications
The City and the Joplin Housing Authority will select locations and improvements needed to the public housing sites and office site.

STORM-WATER IMPROVEMENTS

How the assessment informed allocation
The tornado and ensuing heavy equipment caused significant damage to the manhole and storm sewers across the tornado recovery area. In addition, storm debris resulted in blocked drains and significant water damage caused erosion and collapse of areas.

The city has an annual capital program that repairs and replaces system storm sewers with an annual budget of $96,185.00 annually. Staff surveyed our existing storm water system and estimated replacement costs on undersized, damaged, or otherwise inadequate lines and inlets. The total estimated cost for this project is $14.97 million. Thirty-four projects identified consist of existing priority drainage problems and are largely made up of needed residential neighborhood drainage improvements with a smaller number of improvements at street intersections and commercial areas. These improvements also allow comprehensive GIS mapping of existing and added improvements. Modernized GIS maps reduce future operational costs as well as master planning development. Stormwater projects will be completed prior to paving activity to minimize damage to new pavement.

CDBG Eligibility and National Objective
This Activity is eligible under 03I, Flood Drainage Improvements, and will utilize the National Objective of Low and Moderate Income Area and Slum and Blight Area. In neighborhoods where the census data indicates the Census Block Groups are eligible to receive LMA assistance, this will be used. For those areas that will not qualify under that National Objective, Slum and Blight will be used based on the conditions created by the tornado damage.

Long-term Recovery from Specific Disaster
This project will dramatically improve identified residential and commercial concerns by getting the stormwater off streets quicker and into upgraded conduits, and provides appropriate detention areas for stormwater. The areas identified have deteriorated or were damaged by the tornado and need repair/replacement in order to provide the appropriate amount of service to the areas. Handling the water prior to it backing up streams and onto properties also helps alleviate sanitary sewer issues as well as property flooding. Stormwater flooding can cause significant damage, erosion to property, as well as potential life threatening issues. This project will enhance the targeted neighborhoods by significantly mitigating flooding and reducing stormwater on roadways and properties as quickly and efficiently as possible.

Criteria used to select applications
Applications will not be needed for this program. The priorities of projects will all be decided administratively by the Public Works Department.

JOPLIN AFFORDABLE SENIOR HOUSING

How the assessment informed allocation

Within the Joplin area there are eight senior residential facilities, including one independent living facility, three congregate care facilities, six assisted living facilities, and three nursing homes (note: some projects offer more than one housing type). These eight facilities represent virtually all senior care facilities in Joplin, post tornado, and are representative of the housing choices available to seniors requiring special care housing.

Most effective housing possibilities for aging seniors include multiple housing and care choices in a concentrated area. Referencing Medicare.com and Missouri Department of Health and Senior Services websites for all licensed assisted living facilities, and cross referencing this list with other senior care facility resources, the identified senior care facilities represent all licensed facilities in Joplin.

The Joplin senior care market is reporting overall occupancy rates between 84.8% (congregate care) to 98.3% (nursing care). The American Seniors Housing Association (ASHA) conducts an annual survey of retirement and senior residential care communities. While the occupancy rate at most senior care facilities surveyed by Bowen National Research within Joplin after the tornado event are comparable to those reported within the region and the nation by (ASHA), the nursing care occupancy rate of 98.3% in Joplin is extremely high and much higher than the ASHA averages. These statistics do not factor in affordability.

As such, there appears to be a shortage of affordable senior care housing options in the Joplin market. Joplin proposes that a selection of affordable senior care housing be constructed in the tornado zone, replacing nursing care and other senior housing destroyed.

CDBG Eligibility and National Objective

This Activity is eligible under 03P, Health Facilities, and will utilize the National Objective of serving Low-Moderate Income Clientele.

Long-term Recovery from Specific Disaster

This project specifically aims to provide housing opportunities to seniors within the community. This funding is specifically proposed to fund infrastructure costs associated with the site improvements of the proposed facility, focusing on providing storm water drainage. Creating these rental resources will allow a subset of the population that may not have the resources to afford housing tailored specifically to the senior population, and the project will be essential in reducing the shortage as identified during the earlier Bowen National Research, Housing Needs Assessment study issued April 18, 2014.

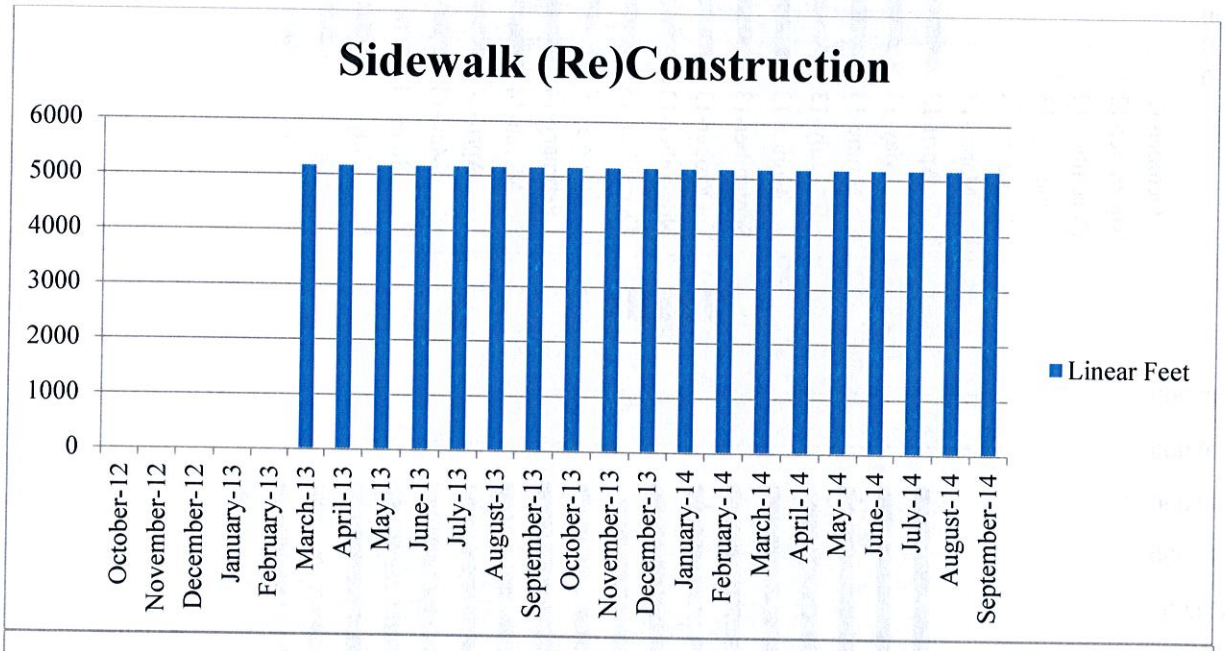
Criteria used to select applications

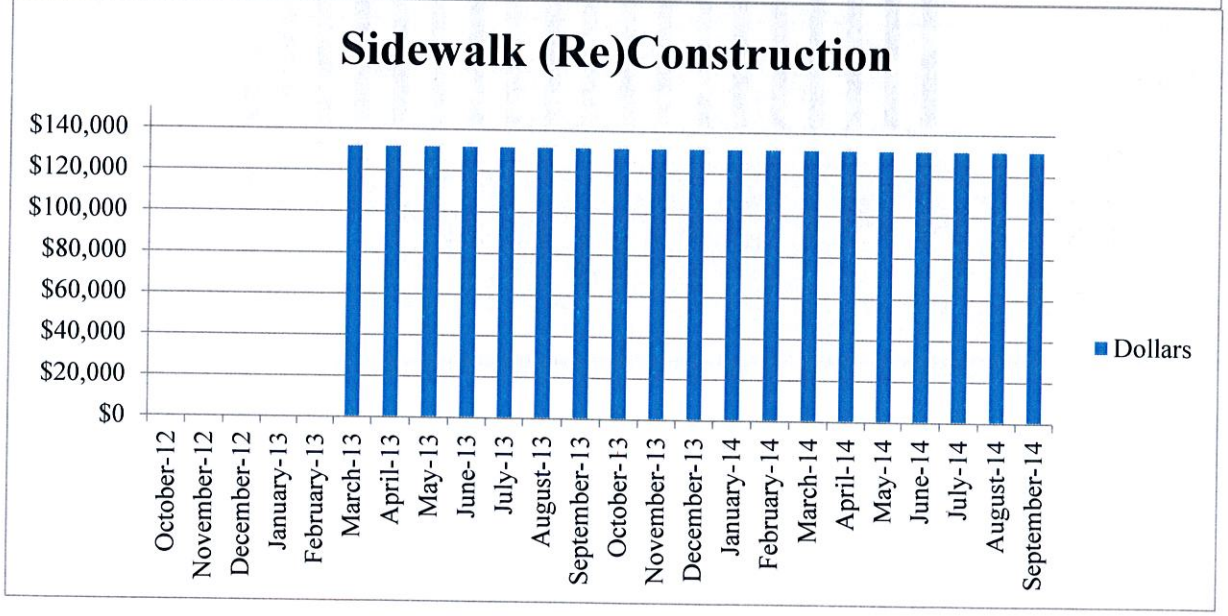
Joplin will request proposals from entities that can demonstrate the ability to finance, construct and manage affordable senior housing. Successful proposals will demonstrate that they have secured a Certificate of Need from the State of Missouri. Joplin will indicate disaster recovery funds will assist with site improvements for the proposal submitted, based on need as shown in

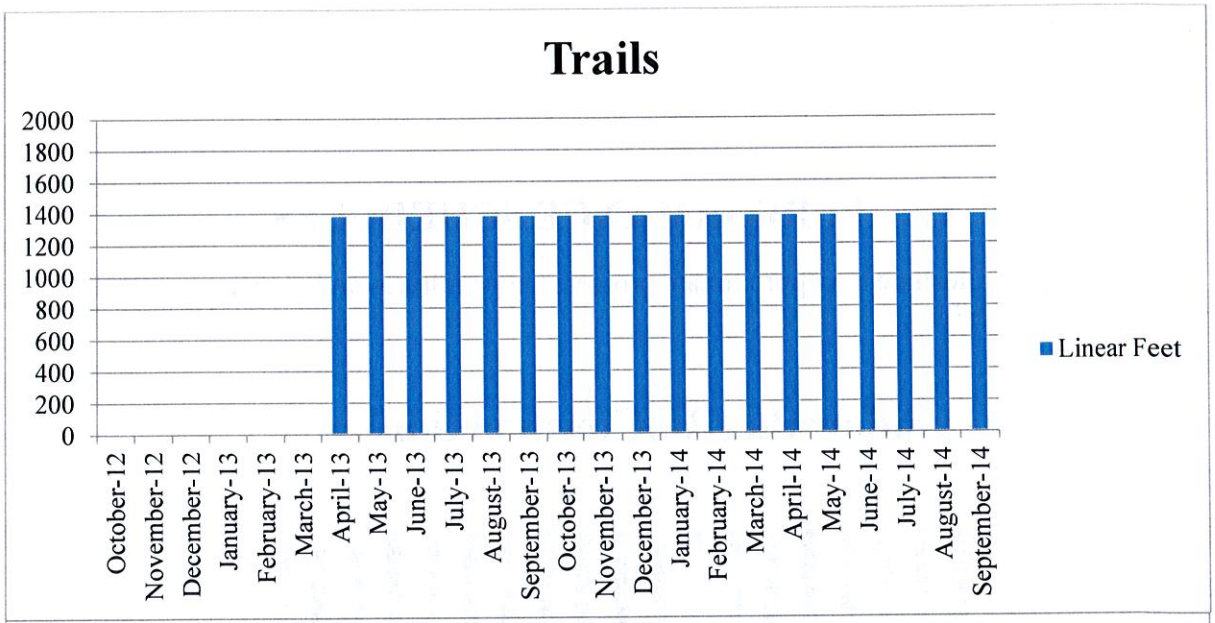
submitted underwriting.

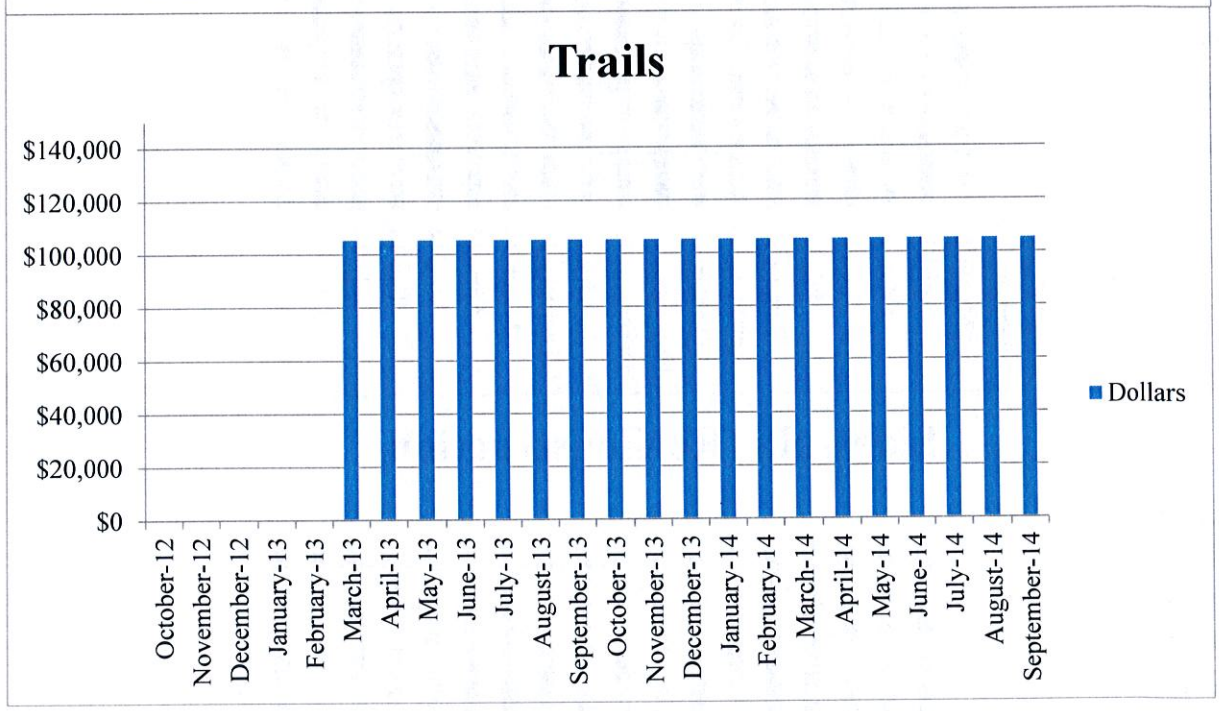
V. PERFORMANCE SCHEDULES

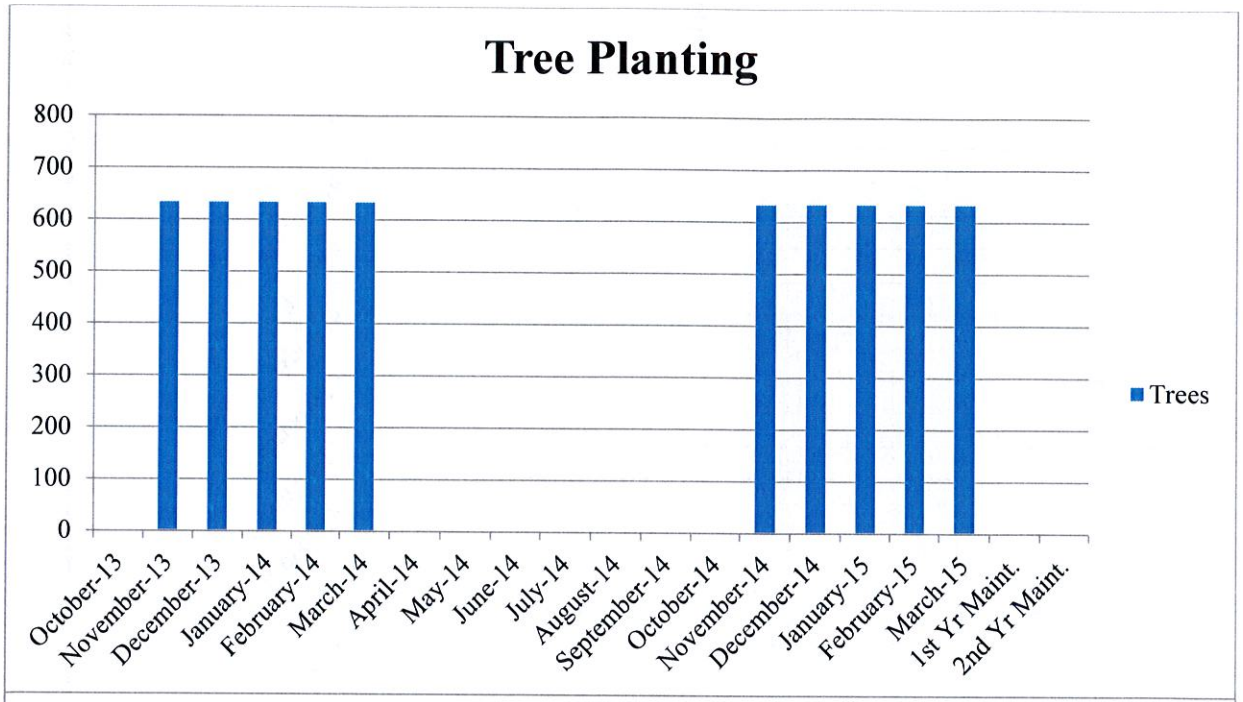
The following tables illustrate the approximate projected expenditures and outcome measures for each activity as applicable.

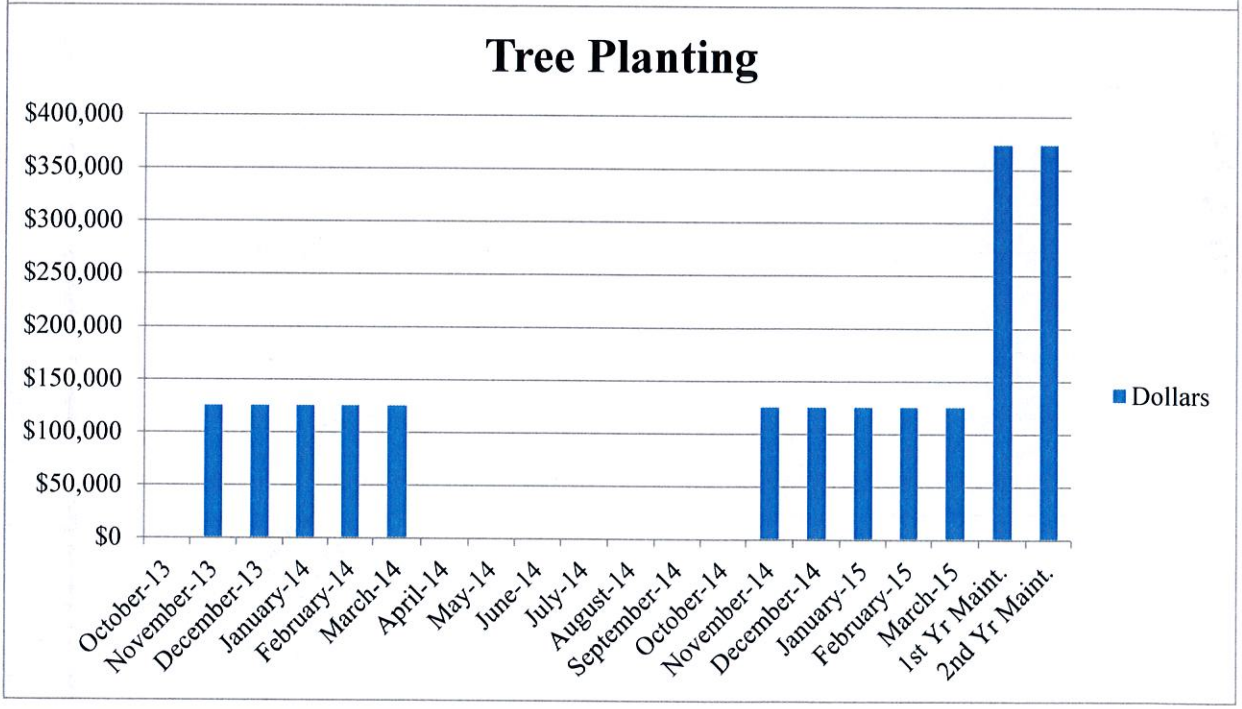


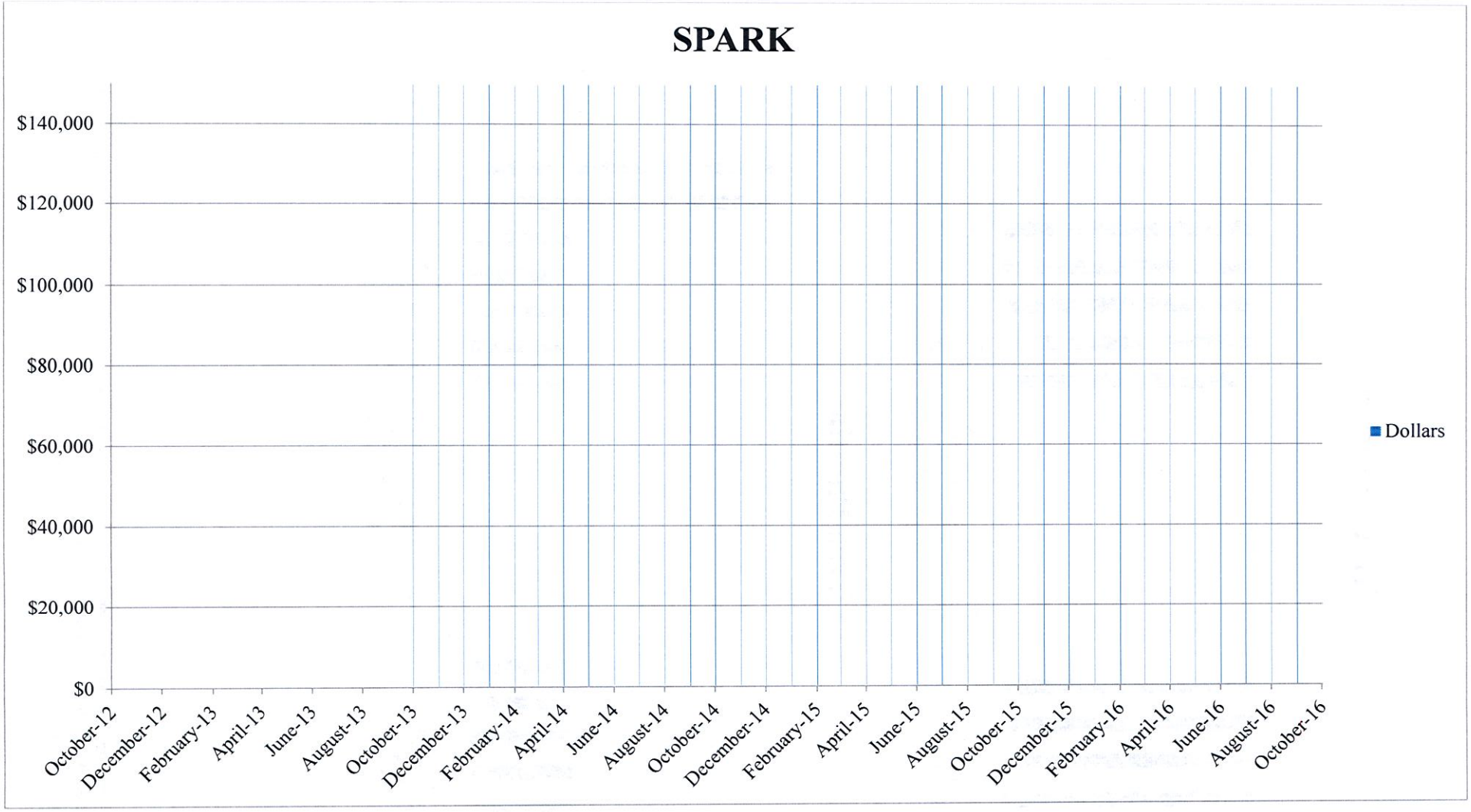


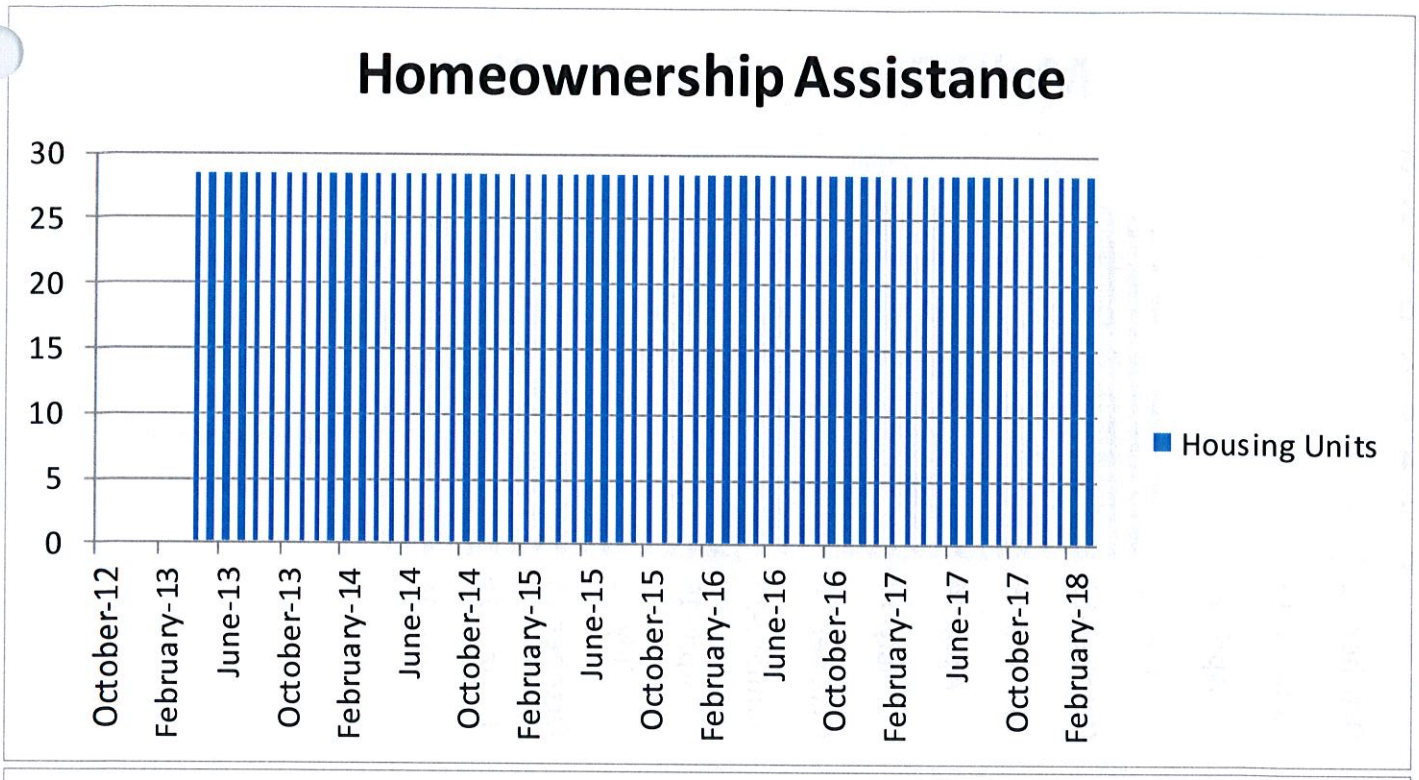

Trails
2000
1800
1600
1400
1200
1000
800
600
400
200
0
October-12
November-12
December-12
January-13
February-13
March-13
April-13
May-13
June-13
July-13
August-13
September-13
October-13
November-13
December-13
January-14
February-14
March-14
April-14
May-14
June-14
July-14
August-14
September-14
Linear Feet

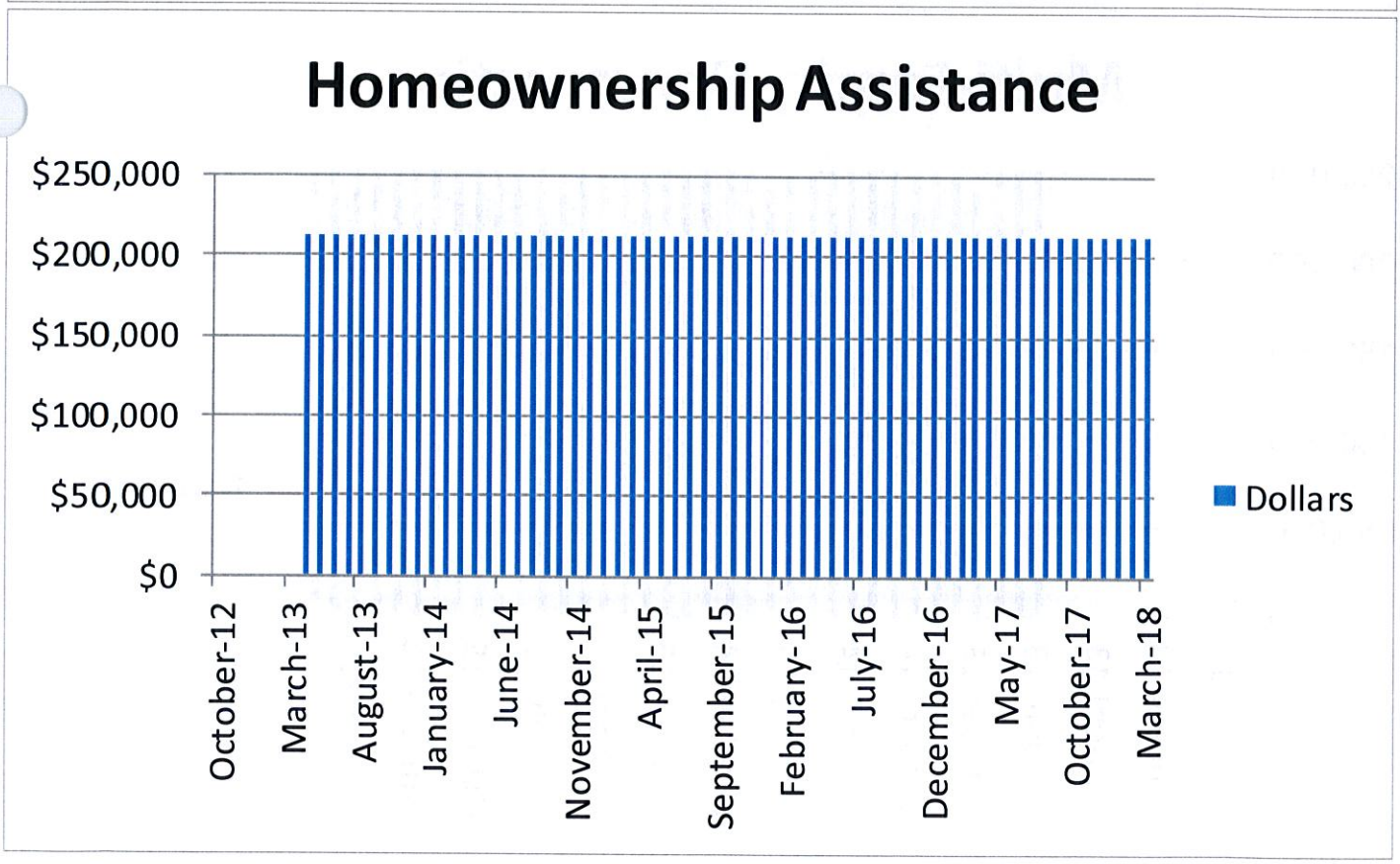

Trails
$140,000
$120,000
$100,000
$80,000
$60,000
$40,000
$20,000
$0
October-12
November-12
December-12
January-13
February-13
March-13
April-13
May-13
June-13
July-13
August-13
September-13
October-13
November-13
December-13
January-14
February-14
March-14
April-14
May-14
June-14
July-14
August-14
September-14
Dollars

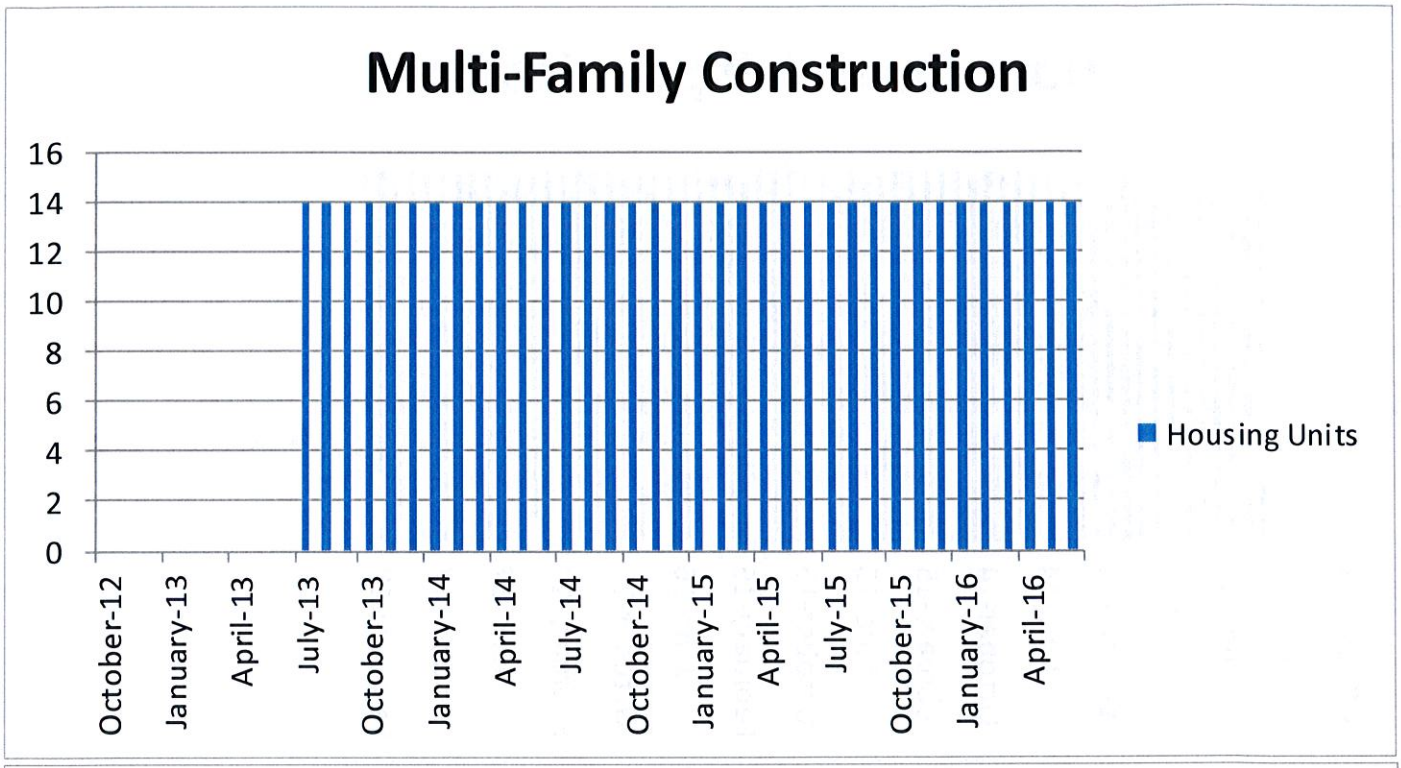

Tree Planting
800
700
600
500
400
300
200
100
0
October-13
November-13
December-13
January-14
February-14
March-14
April-14
May-14
June-14
July-14
August-14
September-14
October-14
November-14
December-14
January-15
February-15
March-15
1st Yr Maint.
2nd Yr Maint.
Trees

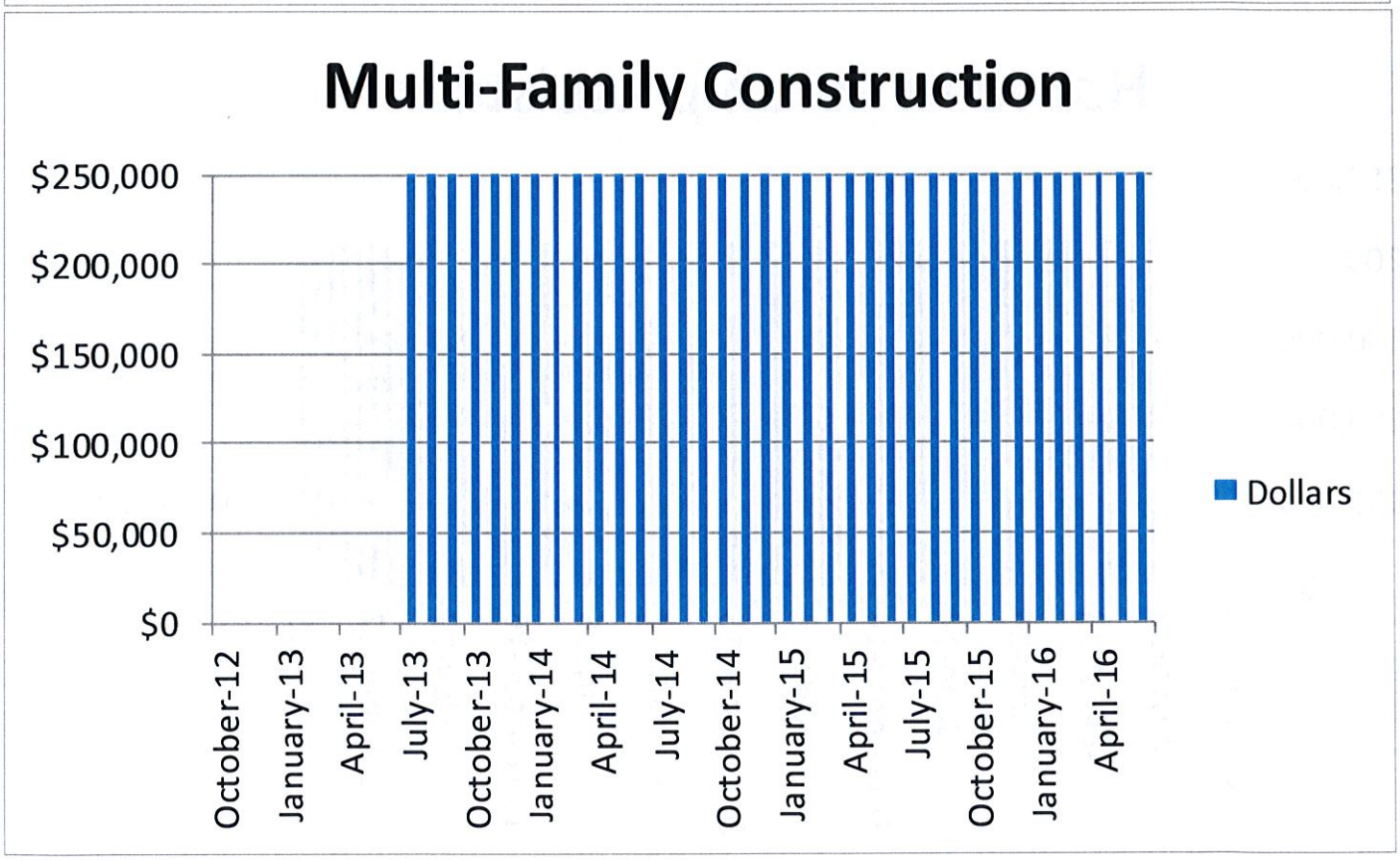

Tree Planting
$400,000
$350,000
$300,000
$250,000
$200,000
$150,000
$100,000
$50,000
$0
October-13
November-13
December-13
January-14
February-14
March-14
April-14
May-14
June-14
July-14
August-14
September-14
October-14
November-14
December-14
January-15
February-15
March-15
1st Yr Maint.
2nd Yr Maint.
Dollars

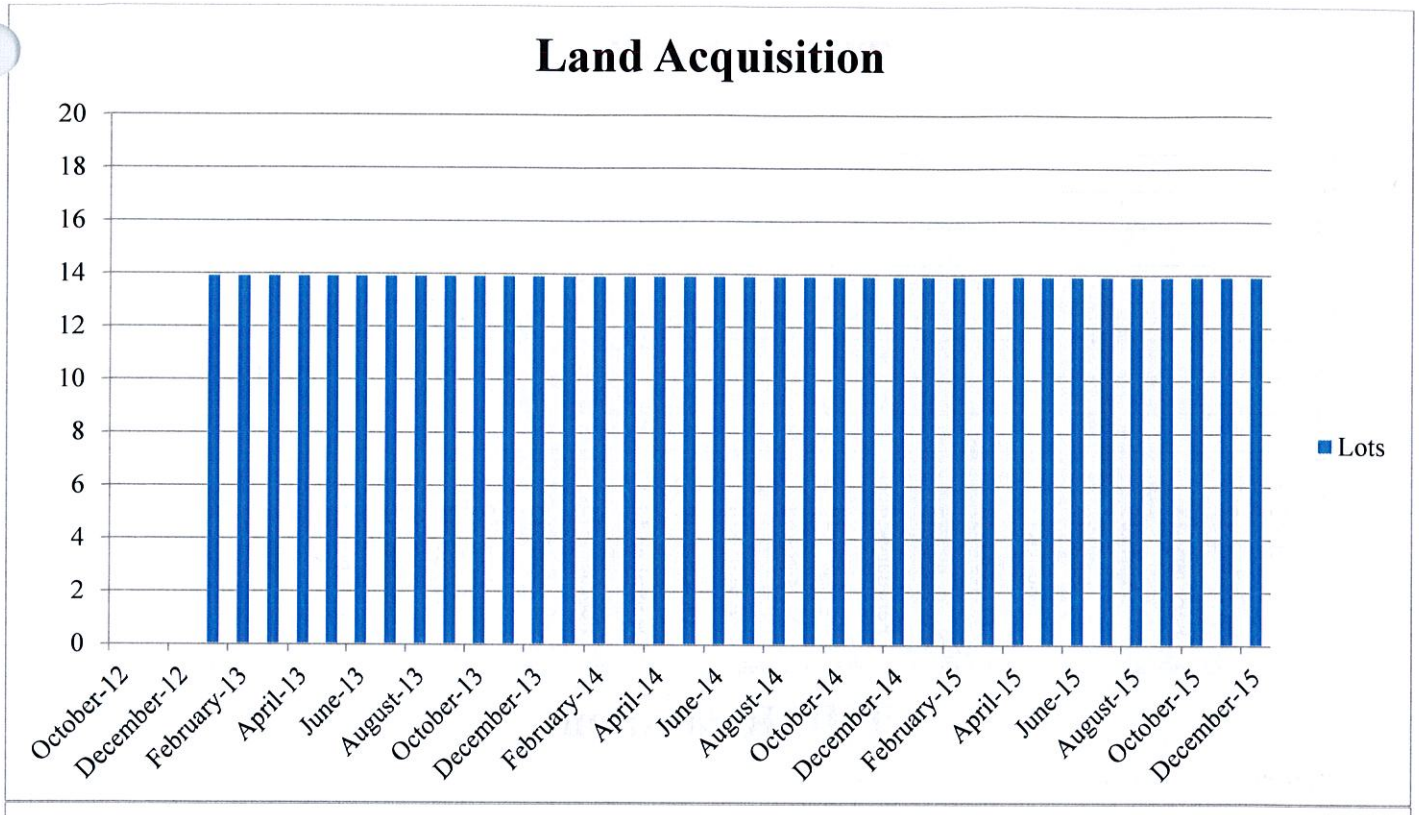

SPARK
$140,000
$120,000
$100,000
$80,000
$60,000
$40,000
$20,000
$0
October-12
December-12
February-13
April-13
June-13
August-13
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
February-16
April-16
June-16
August-16
October-16
Dollars

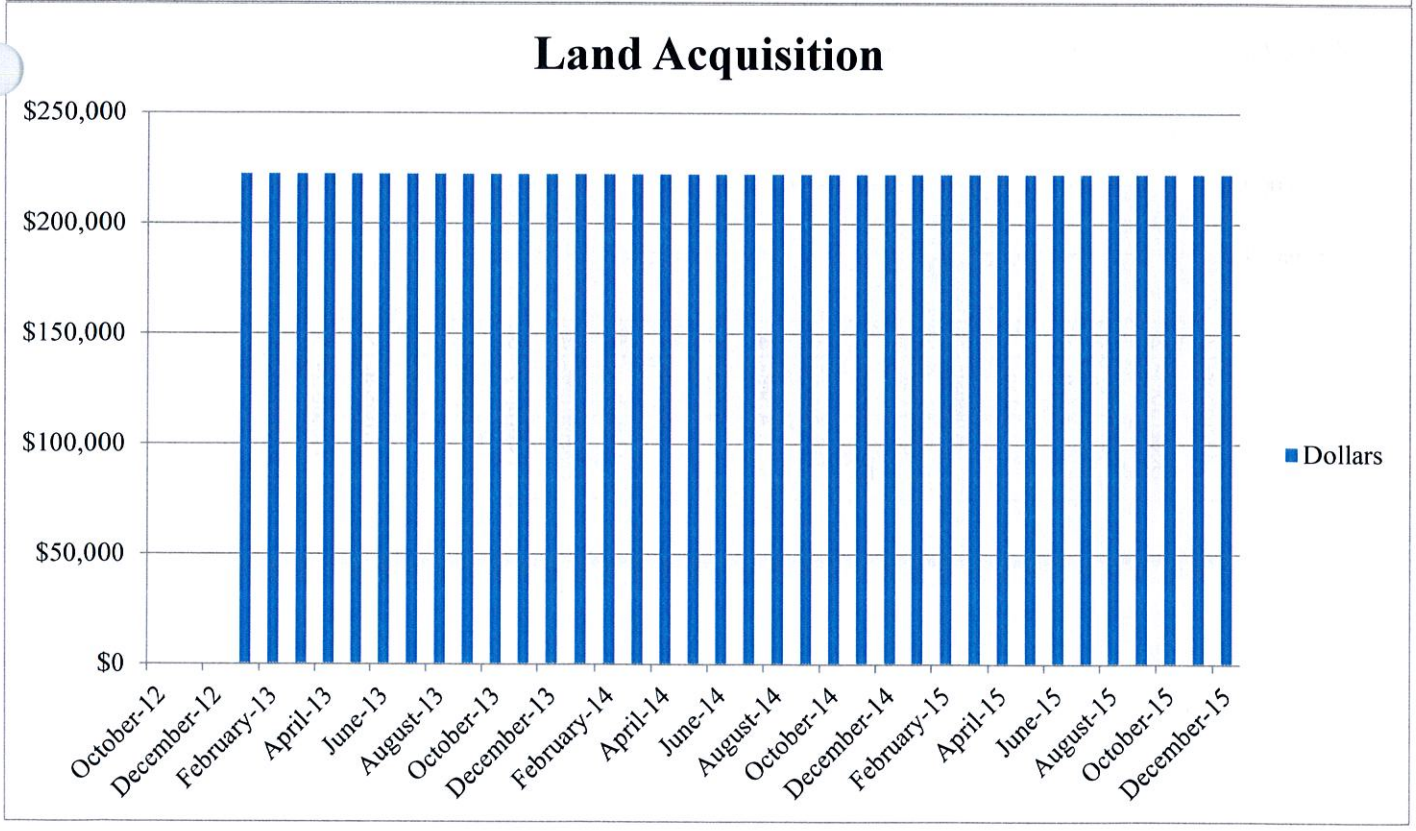

Homeownership Assistance
30
25
20
15
10
5
0
October-12
February-13
June-13
October-13
February-14
June-14
October-14
February-15
June-15
October-15
February-16
June-16
October-16
February-17
June-17
October-17
February-18
Housing Units

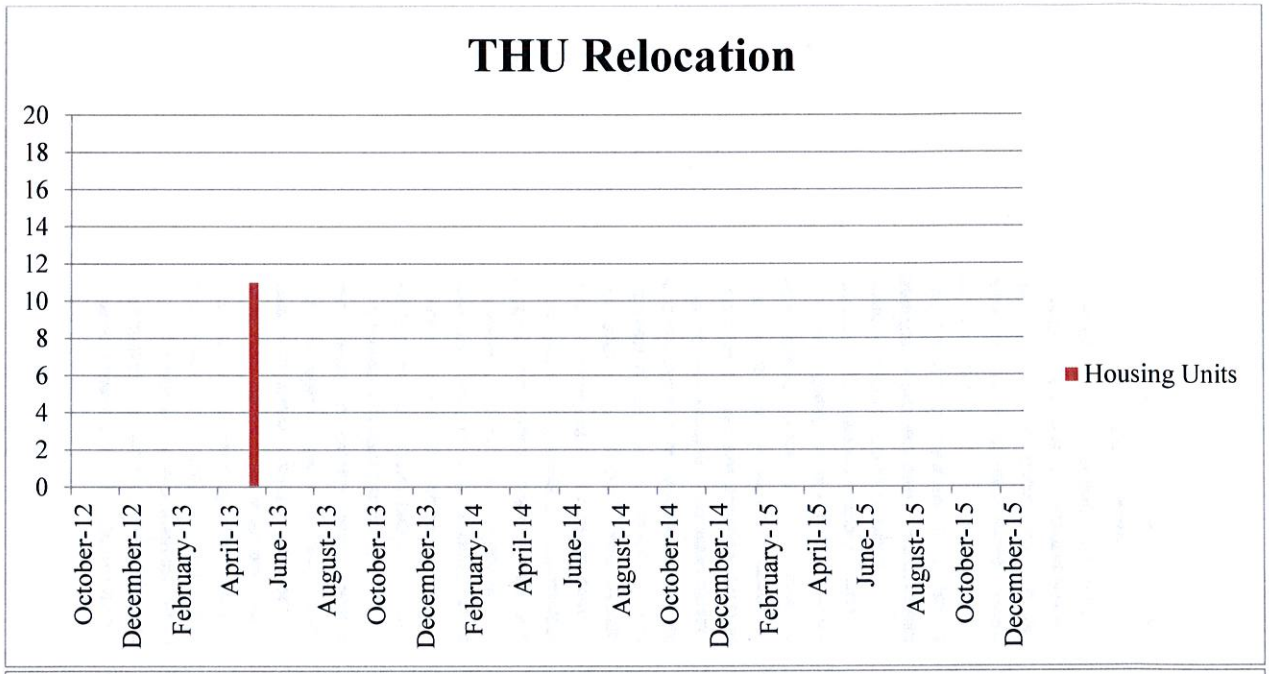

Homeownership Assistance
$250,000
$200,000
$150,000
$100,000
$50,000
$0
October-12
March-13
August-13
January-14
June-14
November-14
April-15
September-15
February-16
July-16
December-16
May-17
October-17
March-18
Dollars

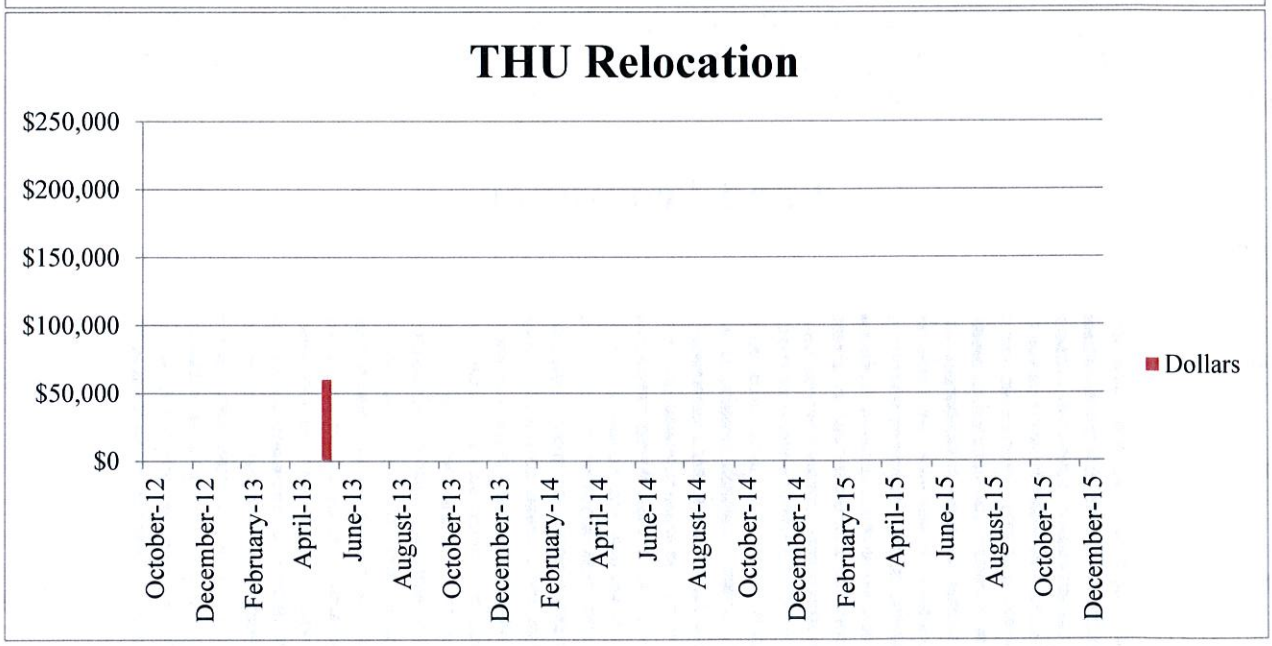

Multi-Family Construction
16
14
12
10
8
6
4
2
0
October-12
January-13
April-13
July-13
October-13
January-14
April-14
July-14
October-14
January-15
April-15
July-15
October-15
January-16
April-16
Housing Units

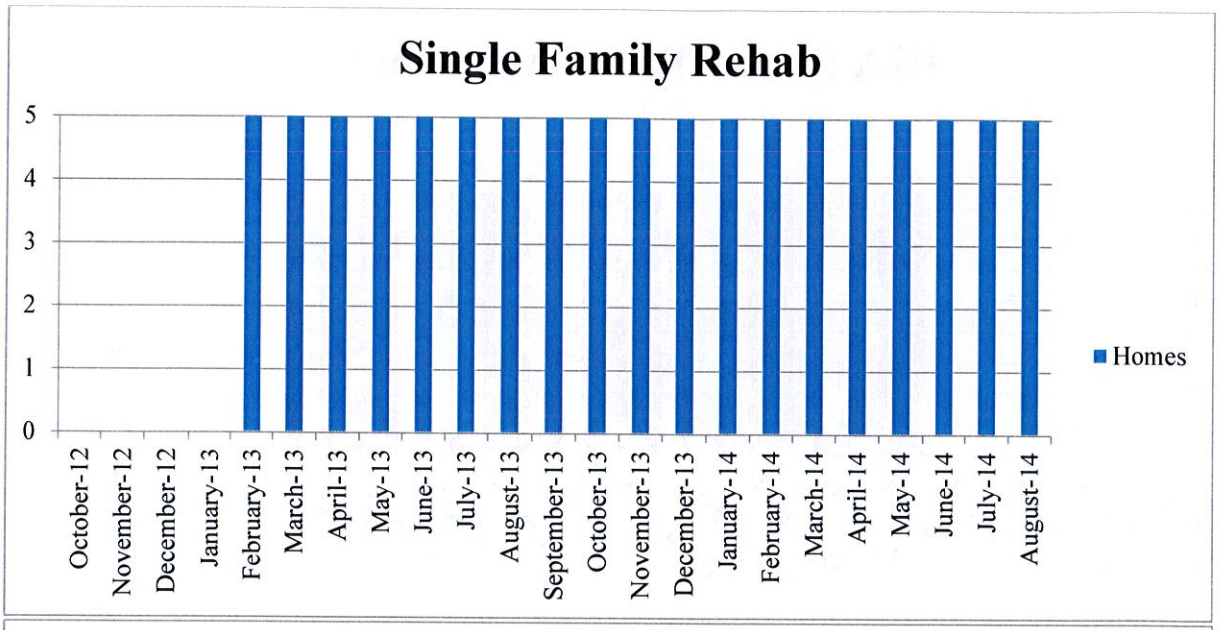

Multi-Family Construction
$250,000
$200,000
$150,000
$100,000
$50,000
$0
October-12
January-13
April-13
July-13
October-13
January-14
April-14
July-14
October-14
January-15
April-15
July-15
October-15
January-16
April-16
Dollars

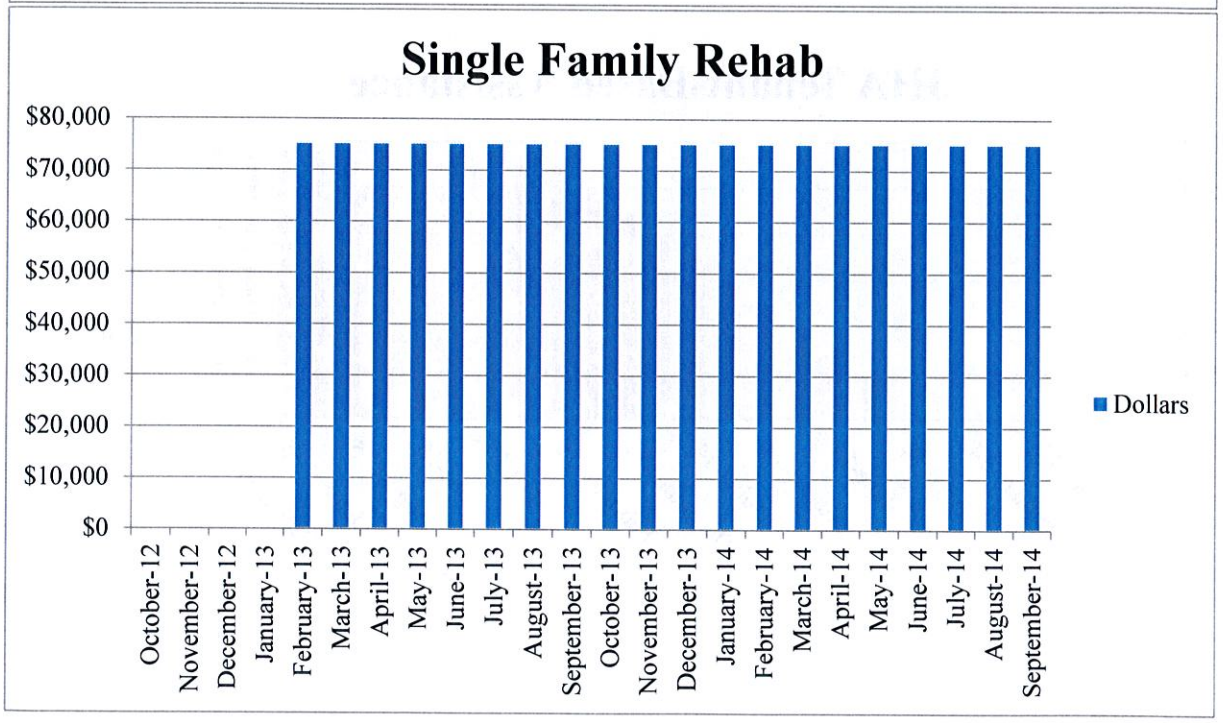

Land Acquisition
20
18
16
14
12
10
8
6
4
2
0
October-12
December-12
February-13
April-13
June-13
August-13
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
Lots

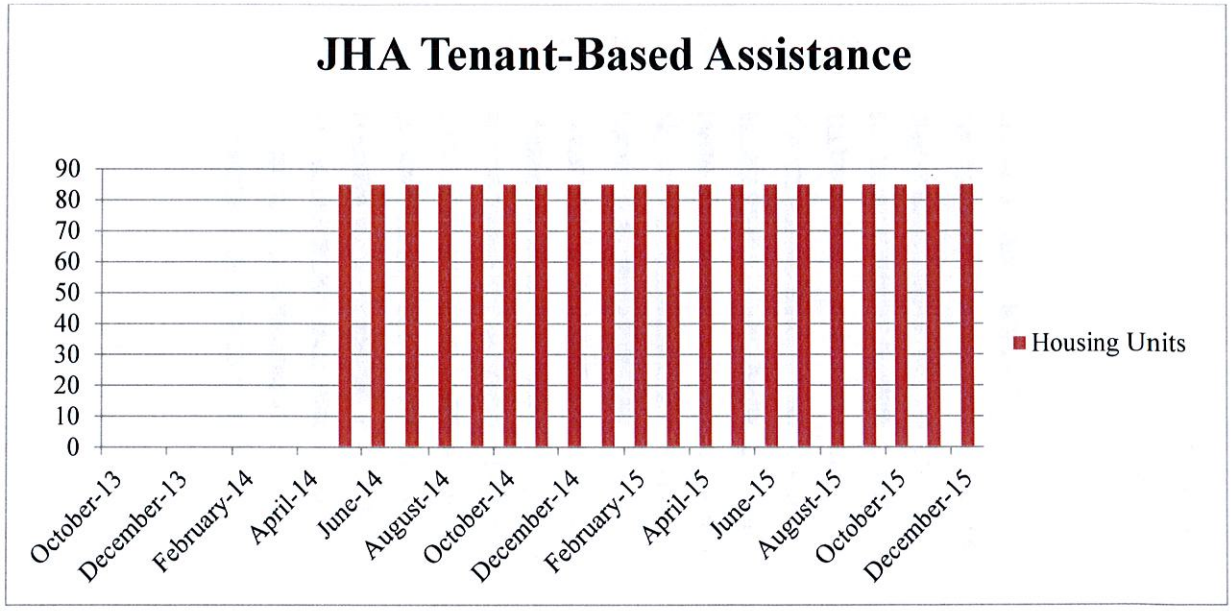

Land Acquisition
$250,000
$200,000
$150,000
$100,000
$50,000
$0
October-12
December-12
February-13
April-13
June-13
August-13
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
Dollars

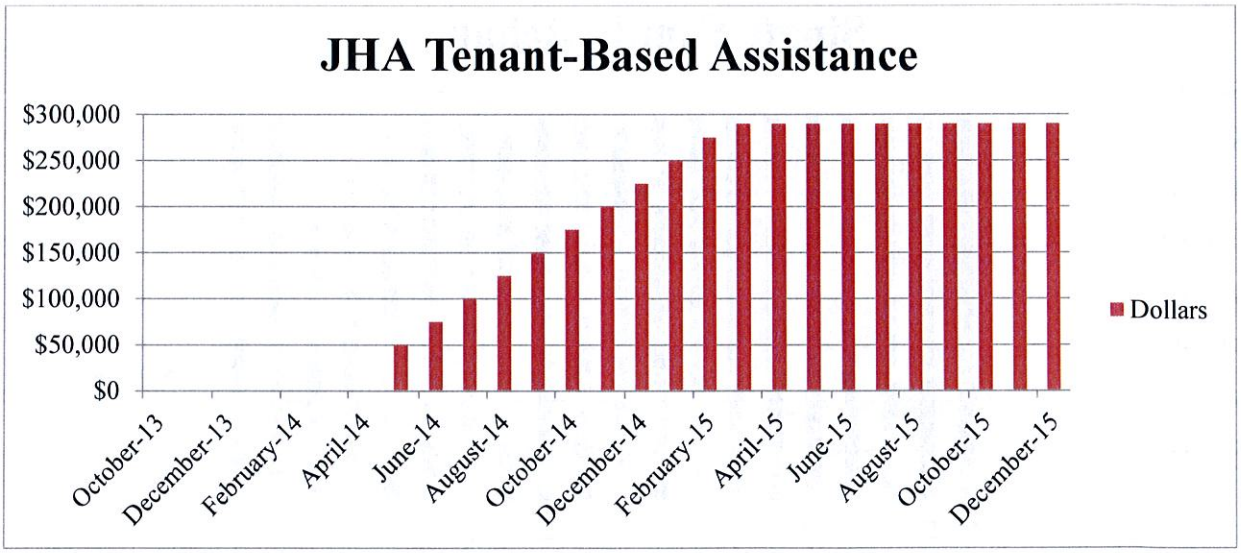

THU Relocation
20
18
16
14
12
10
8
6
4
2
0
October-12
December-12
February-13
April-13
June-13
August-13
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
Housing Units

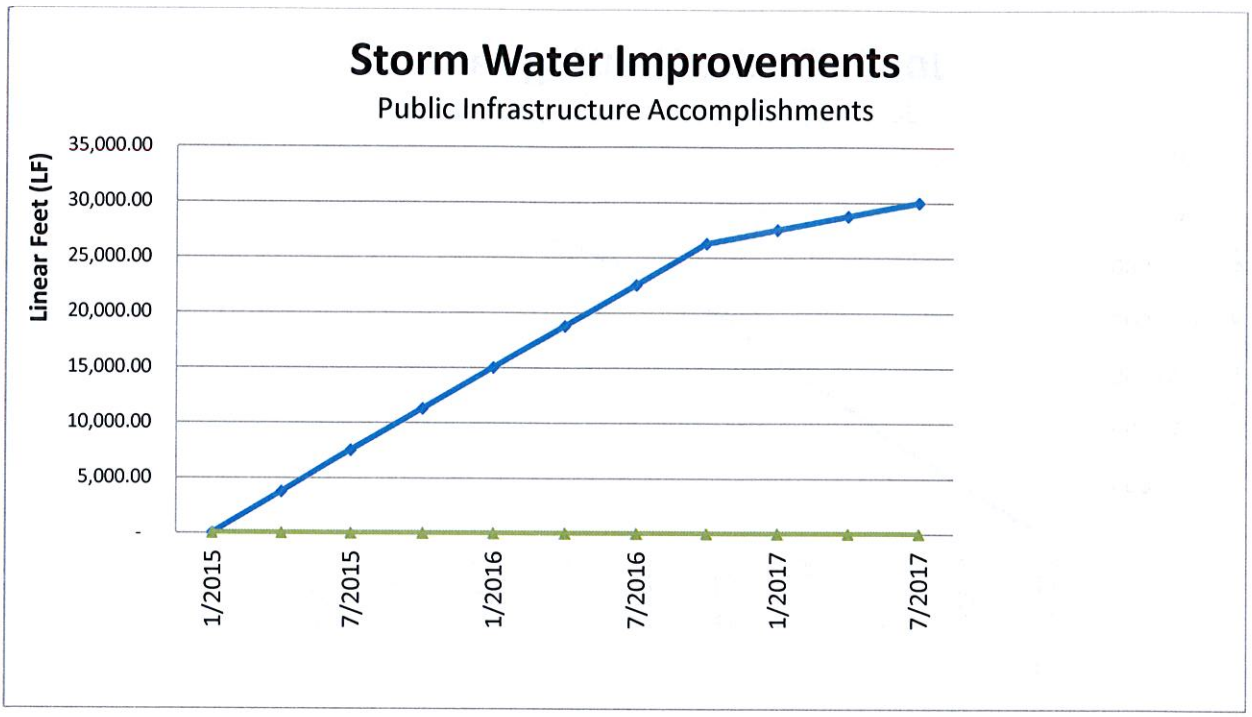

THU Relocation
$250,000
$200,000
$150,000
$100,000
$50,000
$0
October-12
December-12
February-13
April-13
June-13
August-13
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
Dollars

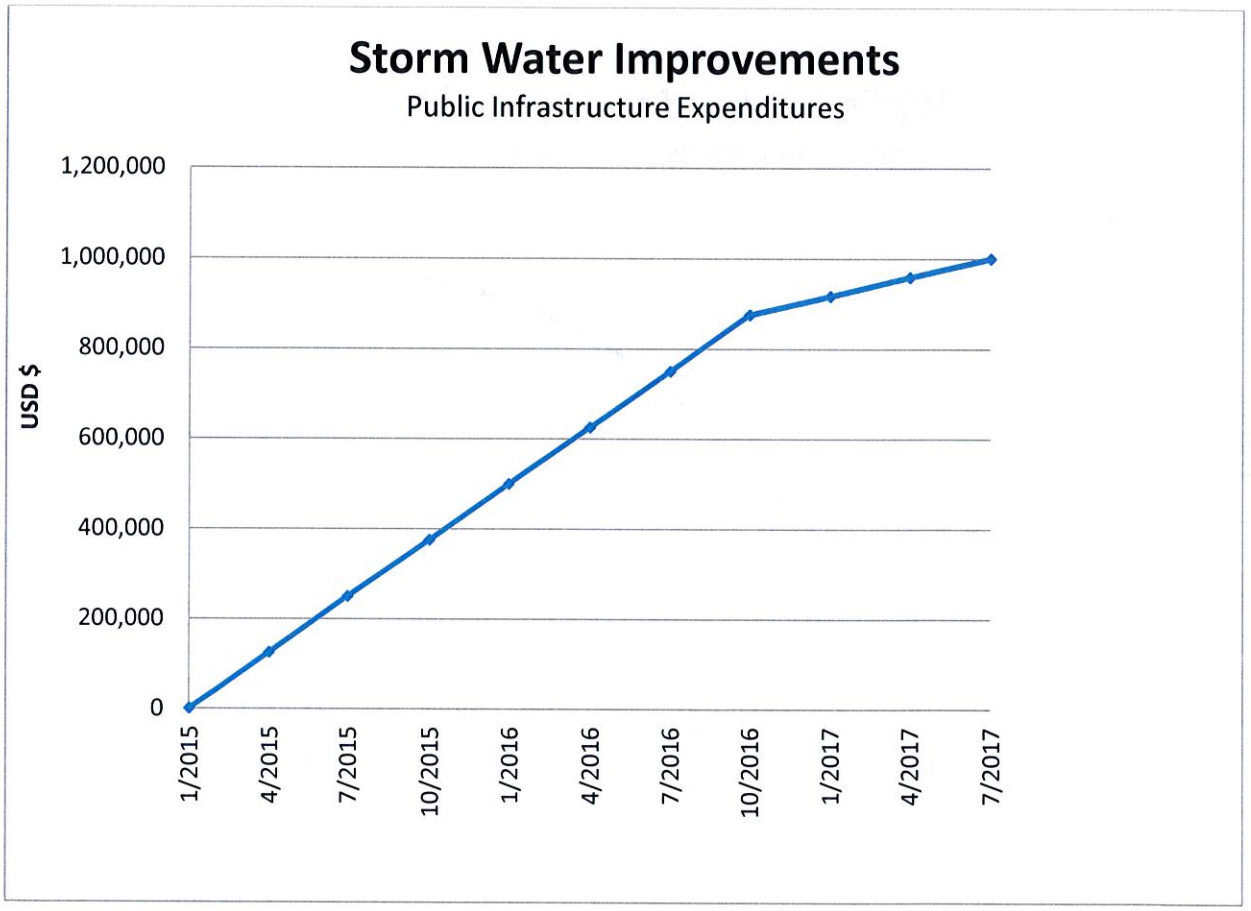

Single Family Rehab
5
4
3
2
1
0
October-12
November-12
December-12
January-13
February-13
March-13
April-13
May-13
June-13
July-13
August-13
September-13
October-13
November-13
December-13
January-14
February-14
March-14
April-14
May-14
June-14
July-14
August-14
Homes

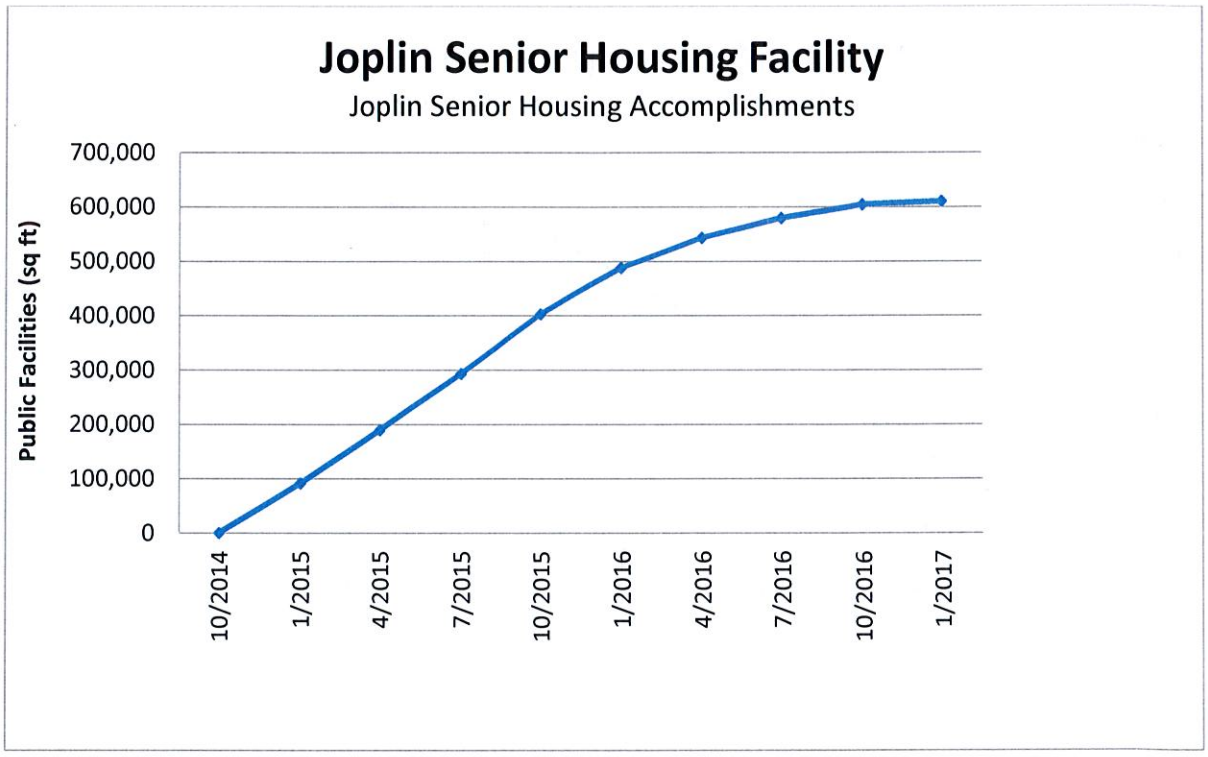

Single Family Rehab
$80,000
$70,000
$60,000
$50,000
$40,000
$30,000
$20,000
$10,000
$0
October-12
November-12
December-12
January-13
February-13
March-13
April-13
May-13
June-13
July-13
August-13
September-13
October-13
November-13
December-13
January-14
February-14
March-14
April-14
May-14
June-14
July-14
August-14
September-14
Dollars

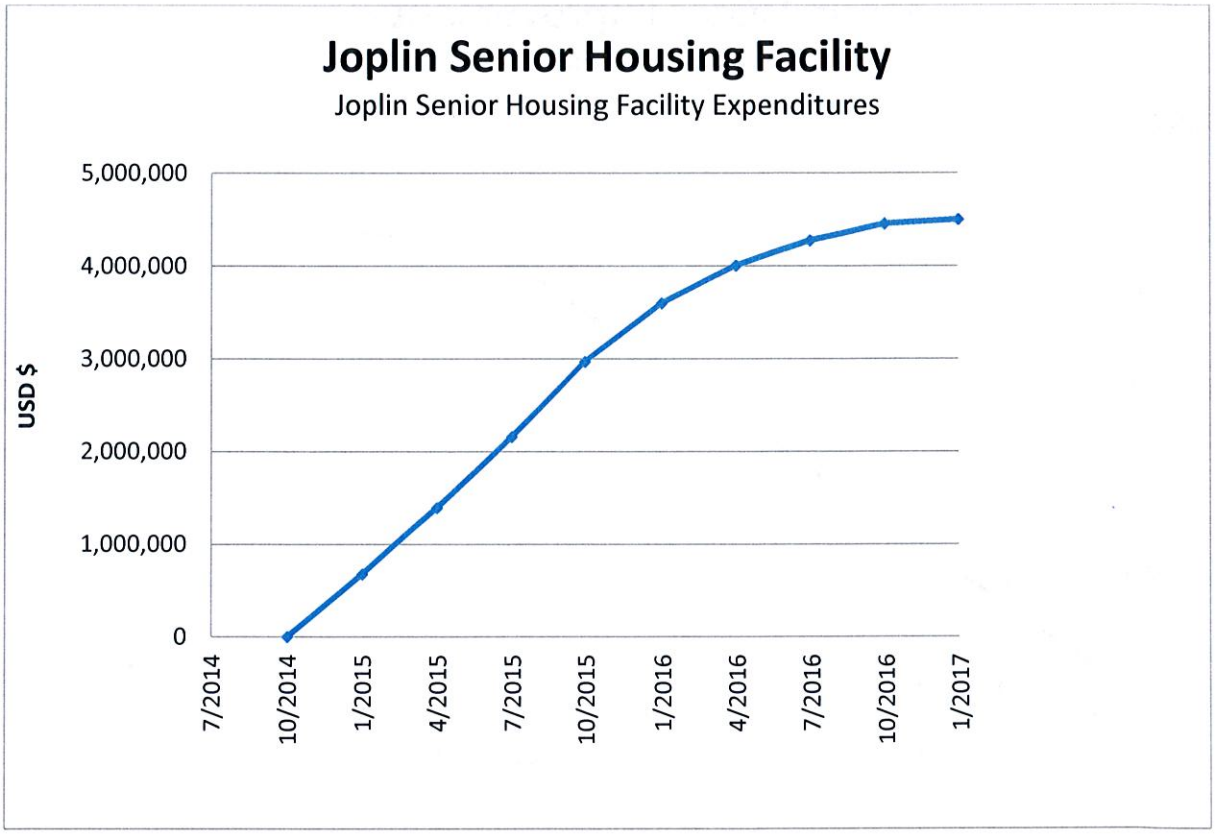

JHA Tenant-Based Assistance
90
80
70
60
50
40
30
20
10
0
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
Housing Units

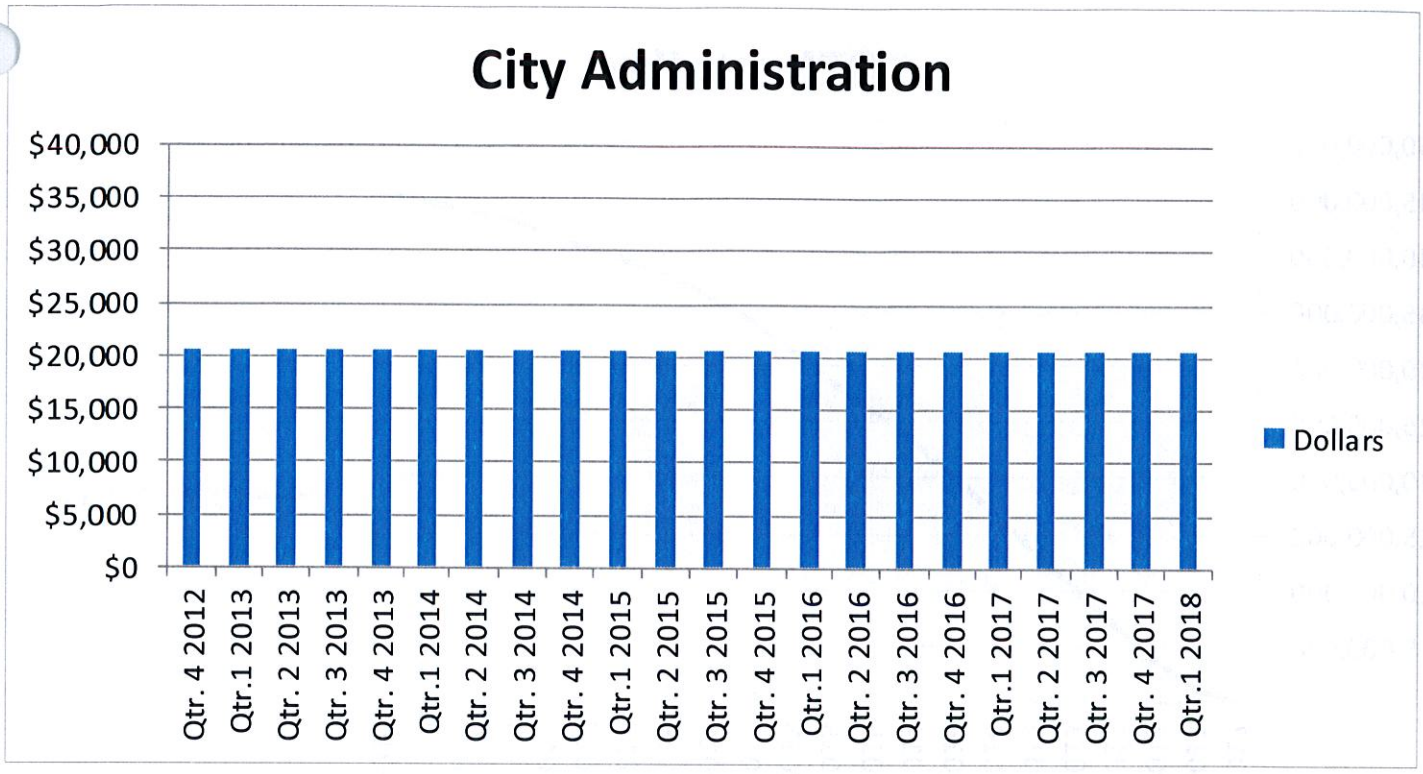

JHA Tenant-Based Assistance
$300,000
$250,000
$200,000
$150,000
$100,000
$50,000
$0
October-13
December-13
February-14
April-14
June-14
August-14
October-14
December-14
February-15
April-15
June-15
August-15
October-15
December-15
Dollars

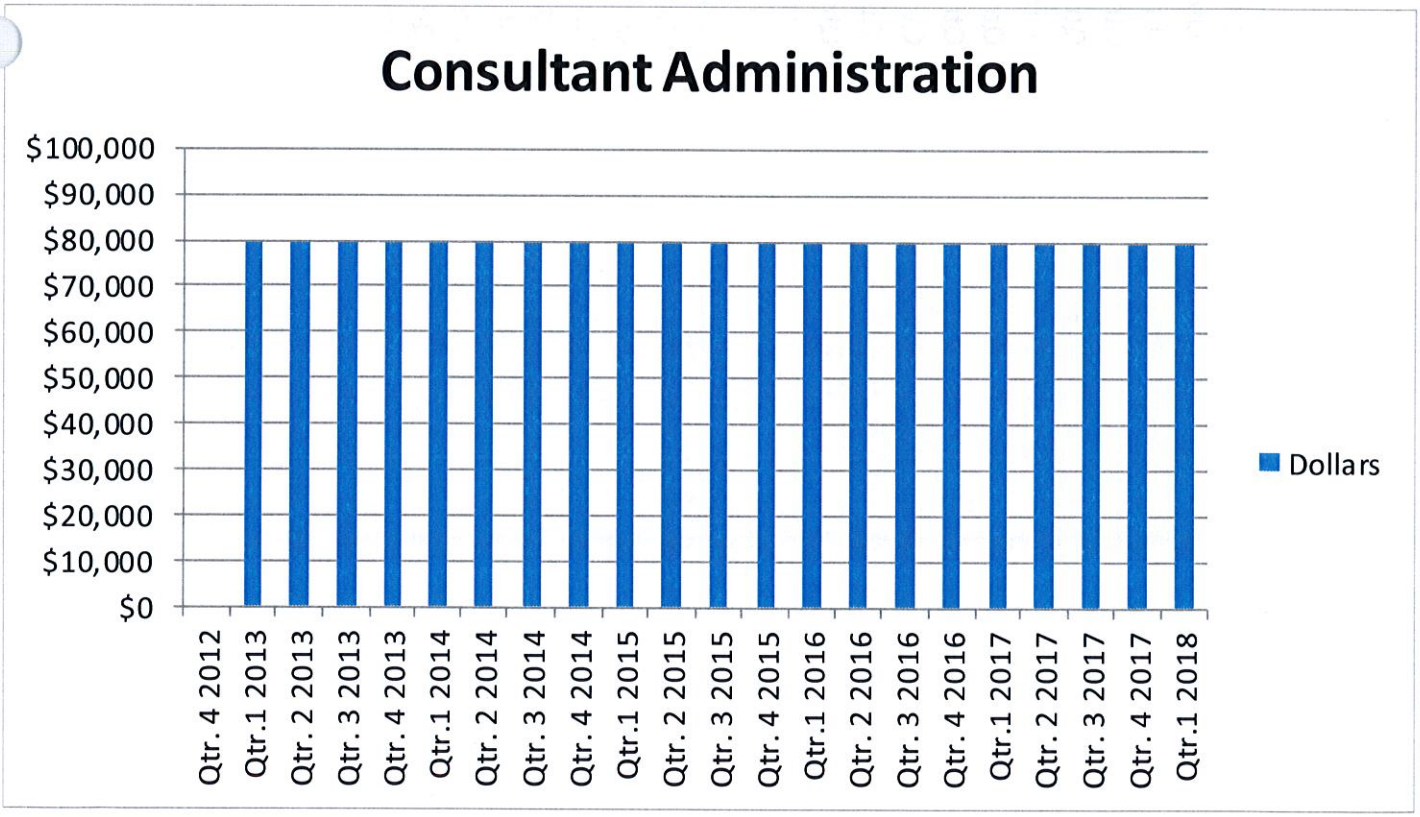

Storm Water Improvements
Public Infrastructure Accomplishments
Linear Feet (LF)
35,000.00
30,000.00
25,000.00
20,000.00
15,000.00
10,000.00
5,000.00
-
1/2015
7/2015
1/2016
7/2016
1/2017
7/2017

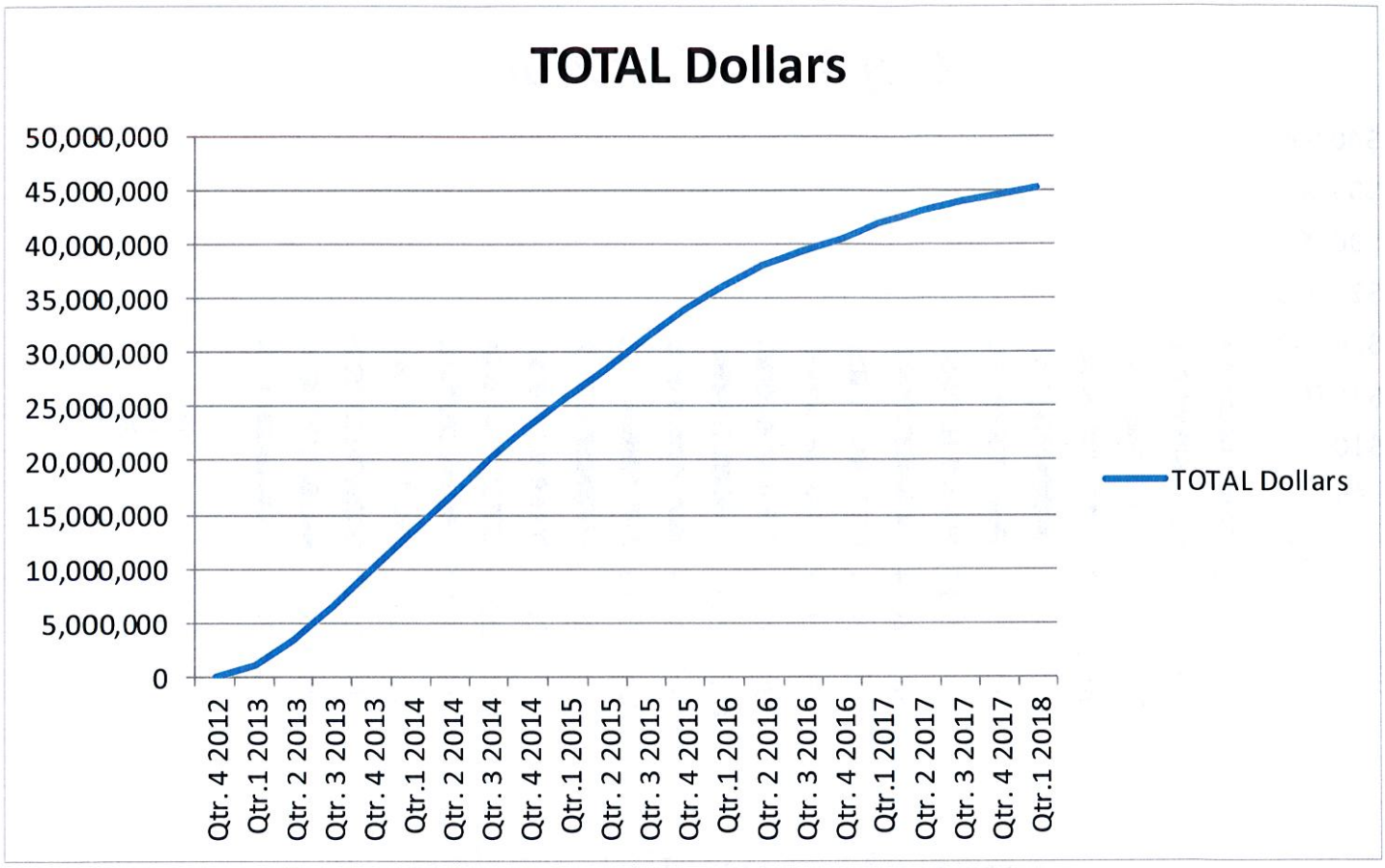

Storm Water Improvements
Public Infrastructure Expenditures
USD $
1,200,000
1,000,000
800,000
600,000
400,000
200,000
0
1/2015
4/2015
7/2015
10/2015
1/2016
4/2016
7/2016
10/2016
1/2017
4/2017
7/2017


Joplin Senior Housing Facility
Joplin Senior Housing Accomplishments
Public Facilities (sq ft)
700,000
600,000
500,000
400,000
300,000
200,000
100,000
0
10/2014
1/2015
4/2015
7/2015
10/2015
1/2016
4/2016
7/2016
10/2016
1/2017


Joplin Senior Housing Facility
Joplin Senior Housing Facility Expenditures
USD $
5,000,000
4,000,000
3,000,000
2,000,000
1,000,000
0
7/2014
10/2014
1/2015
4/2015
7/2015
10/2015
1/2016
4/2016
7/2016
10/2016
1/2017


City Administration
$40,000
$35,000
$30,000
$25,000
$20,000
$15,000
$10,000
$5,000
$0
Qtr. 4 2012
Qtr.1 2013
Qtr. 2 2013
Qtr. 3 2013
Qtr. 4 2013
Qtr.1 2014
Qtr. 2 2014
Qtr. 3 2014
Qtr. 4 2014
Qtr.1 2015
Qtr. 2 2015
Qtr. 3 2015
Qtr. 4 2015
Qtr.1 2016
Qtr. 2 2016
Qtr. 3 2016
Qtr. 4 2016
Qtr.1 2017
Qtr. 2 2017
Qtr. 3 2017
Qtr. 4 2017
Qtr.1 2018
Dollars


Consultant Administration
$100,000
$90,000
$80,000
$70,000
$60,000
$50,000
$40,000
$30,000
$20,000
$10,000
$0
Qtr. 4 2012
Qtr.1 2013
Qtr. 2 2013
Qtr. 3 2013
Qtr. 4 2013
Qtr.1 2014
Qtr. 2 2014
Qtr. 3 2014
Qtr. 4 2014
Qtr.1 2015
Qtr. 2 2015
Qtr. 3 2015
Qtr. 4 2015
Qtr.1 2016
Qtr. 2 2016
Qtr. 3 2016
Qtr. 4 2016
Qtr.1 2017
Qtr. 2 2017
Qtr. 3 2017
Qtr. 4 2017
Qtr.1 2018
Dollars


TOTAL Dollars
50,000,000
45,000,000
40,000,000
35,000,000
30,000,000
25,000,000
20,000,000
15,000,000
10,000,000
5,000,000
0
Qtr. 4 2012
Qtr.1 2013
Qtr. 2 2013
Qtr. 3 2013
Qtr. 4 2013
Qtr.1 2014
Qtr. 2 2014
Qtr. 3 2014
Qtr. 4 2014
Qtr.1 2015
Qtr. 2 2015
Qtr. 3 2015
Qtr. 4 2015
Qtr.1 2016
Qtr. 2 2016
Qtr. 3 2016
Qtr. 4 2016
Qtr.1 2017
Qtr. 2 2017
Qtr. 3 2017
Qtr. 4 2017
Qtr.1 2018
TOTAL Dollars

VI. BUDGET (Revised 11/17/2014)

COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY BUDGET

Infrastructure Activities	
Sidewalk Reconstruction/Construction	$ 2,500,000.00
Trail Construction	$ 2,000,000.00
Tree Planting	$ 2,000,000.00
Storm Water Improvements	$ 1,000,000.00
Sub Total	**$ 7,500,000.00**
Economic Development	
SPARK – Performing Arts/Depot Renovation	$ 5,390,000.00
Sub Total	**$ 5,390,000.00**
Housing Activities	
Single Family Homeownership Direct Assistance	$12,750,000.00
(Safe Rooms Included in New Construction Activities)	
Mixed-Income Multi-family Residential	$ 4,500,000.00
Joplin Affordable Senior Housing	$ 4,500,000.00
Single Family Rehabilitation	$ 1,500,000.00
Land Acquisition/Assemblage	$ 6,440,000.00
FEMA THU Relocation	$ 60,000.00
Housing Authority Tenant Based Rental Assistance	$ 290,000.00
Housing Authority Site Improvements Repair	$ 210,000.00
Sub Total	**$ 30,250,000.00**
Program Administration Activities	
City of Joplin Administrative Costs	$ 452,667.09
Description: Pro-rata share of salary and benefits of Planning/ Community Development staff plus overhead including supplies, rent, etc	
Consultant Administrative Costs	$ 1,674,041.91
Description: Negotiated Administrative cost to allow for the hiring of a consulting firm to manage the majority of the grant admin and activities. **(5% maximum = $2,263,335.45)**	
Program Planning Activities	
Planning Activities (15% max. = $6,790,006.35)	$ 0.00
Sub Total (20% maximum)	**$ 2,126,709.00**
TOTAL CDBG-DR AWARD	**$ 45,266,709.00**

VII. Public Comment

The City of Joplin provided an informal public meeting on July 3rd with a prominent posting on the City's official website indicating written comments would be accepted through July 12th at 5pm. The public meeting was advertised in the Joplin Globe and information was disseminated through local groups that have been active in Joplin's recovery efforts. Although conversations were held with the attendees of the public meeting, no written public comments were received during the mandatory 7-day comment period nor have any written comments been received before or after the official comment period.

VIII. Certifications and SF-424

The necessary SF-424 and Certifications required for these CDBG-DR funds are attached to this document and can be found in Appendix A.

Appendix A - CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the Disaster Recovery Action Plan, the jurisdiction certifies that:

A. Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

B. Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

C. Lobbying Certification – The Grantee certifies that its compliance with restriction on lobbying required by 24 CFR party 87, together with disclosure forms, if required by part 87.

D. State and Local Laws – The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice.

E. Consistency with Action Plan – The grantee certifies that activities to be undertaken with funds under Federal Register Volume 77, Number 73 are consistent with its Action Plan.

F. Acquisition and Relocation – 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.

G. Section 3 – 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.

H. Public Participation – The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements o f24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant).

I. Use of Funds – 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 2011, 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 disaster recovery 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 disaster recovery funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 50 percent 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 disaster recovery grant funds, by assessing any amount against properties owned and occupied by persons of low and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (A) Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (B) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (A).

J. Civil Rights -- 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) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations.

K. Excessive Force -- The grantee certifies that it has adopted and is enforcing the following policies:
(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
(2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

L. Capacity -- Each State or unit of local government receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) has the capacity to carry out disaster recovery activities in a timely manner; or the State or unit of local government will develop a plan to increase capacity where such capacity is lacking.

M. Special Flood Hazard Area -- The grantee certifies that it will not use CDBG disaster recovery funds for any activity in an area delineated as a special flood hazard area 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.

N. Lead-based Paint -- 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.

O. Applicable Laws -- The grantee certifies that it will comply with applicable laws.

_____ _____

Signature/Authorized Official Date

_____

Title

Appendix B – LOCAL COUNCIL RESOLUTION