COMMUNITY DEVELOPMENT BLOCK GRANT

DISASTER RECOVERY- ROUND II ($113M)



INITIAL ACTION PLAN FOR

THE CITY OF JOPLIN

Supplemental CDBG Disaster Recovery
Authorized by the Disaster Relief Appropriations Act, 2013
(Public Law 113-2)
U.S. Department of Housing and Urban Development
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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 3,500 dwellings were destroyed with an additional 4,000damaged 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.

Although the FEMA THU program has officially ended, the City has been left with a number of vacant lots throughout the tornado area. As an update to the City's first Housing Impact Assessment, the City commissioned an updated Housing Study by Novogradac as well as using internal methods to estimate population loss.

The following text is an excerpt from the Novogradac Housing Study updated in 2012:

> *"Analysis: In the May 2011 tornado, 602 housing units suffered partial or semi-major damage while 4,252 units were completely damaged or destroyed. In addition over 2,700 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.*
>
> *Per our calculation from our September 2011 study, in order to determine the number and type of units that need to be replaced, we utilized the 3,422 units that were completely damaged or destroyed as a starting point. First, we determined 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, we assumed that approximately 45 percent of the units destroyed were rental units.*

NUMBER OF REPLACEMENT 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 REPLACEMENT OWNER-OCCUPIED UNITS	
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 assumed 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 recommended the replacement of 1,400 rental units and 1,700 owner-occupied units for a total of 3,100 units.

As of mid-June 2012, a total of 951 multifamily rental units had been permitted for rebuilding or repairing. In addition, there are 248 LIHTC units that have received allocations and are in the planning process but have not yet been issued permits. Thus, the total number of permitted and approved multifamily rental units equates to 1,199 units, which is 201 units below our initial September 2011 recommendation of 1,400 units.

For the 1,400 rental units, we recommended a combination of market rate single-family homes, market rate traditional multifamily developments and affordable developments for a total of 625 market rate units and 775 affordable units. Approximately 651 affordable (LIHTC and Section 8) units have come online or been permitted as of mid-June 2012. Based on this data combined with interviews with local stakeholders, we believe that the number of LIHTC units in the market is currently sufficient; however, an additional 125 units for very low income households is still necessary to house all of the remaining tenants in the FEMA units. As of October 2012, out of the 160 families housed in FEMA trailers the majority were seeking rental resources.

The difference between the number of units we recommended in our September 2011 study and the number of units that have currently been issued/planned is 201 units. As previously noted, we recommend the addition of 125 units for very low income households. At this time, until all of the proposed multifamily stock comes online, we believe that an additional 75 market rate units for moderate income households could be supported in the market.

In our September 2011 report, we estimated that 1,700 owner-occupied units needed to be replaced. As of mid-May 2012, 716 homes have been completely rebuilt or newly built, and 3,299 homes have been repaired. Of the 716 homes that have been completely rebuilt, approximately 55.7 percent have cost $110,000 or less, indicating that they are targeting low to moderate income households. Interviews with market participants indicate that, at this time, there is not a need for speculative homes to be built in the Joplin area; however, interviewees did indicate that there are some prior homeowners that are still waiting to see what is being built before rebuilding themselves. In addition, there are still prior

homeowners living with family and friends at the present time. A city-wide door-to-door survey illustrated that 157 families were doubled-up with another family in a temporary situation. In addition, 100 families from Joplin Schools Survey were identified as still need permanent housing. Overall, we estimate that approximately 20 percent of prior homeowners are still waiting to rebuild or living with family; thus, we estimate that approximately 340 owner-occupied homes still need to be rebuilt in the market.

Action:

- *Build 125 Section 8 multifamily rental units.*
- *Build 75 market rate multifamily units targeted toward persons with moderate incomes.*
- *Replace/build 340 owner-occupied homes to satisfy demand for remaining households that have yet to rebuild or are staying with family and friends."*

The City's first allocation of CDBG-DR funding includes the following programs to address these needs:

Program	Funding	Unit Estimates
Direct Homeownership Assistance	$12,750,000	Minimum 400
Multi-family Residential	$9,000,000	Approximately 500
Single Family Rehabilitation	$1,500,000	Approximately 100

In an effort to project population loss, the City collected data from the following sources:

1) City's Building Permit Data
2) Aerial Photography
3) School Enrollment Data
4) Utility Service Data (Empire District Electric & Missouri American Water)

Based on these data sources, the City believes that the potential number of households lost post-tornado is between 1,400 and 1,800. When looking at this data combined with the Novogradac recommended actions listed above, the City believes that its current programs provide opportunity for the market of housing demand that remains in the Joplin. In addition to addressing this need, the City's housing programs also address the need to minimize the amount of vacant lots in the community through encouraging new residents to locate within Joplin through its Direct Homeownership Assistance activity (a.k.a. the Principal Reduction Program). This activity is structured in a way such that the assistance will be provided directly to purchasers of housing and will not create a situation that funding will create speculative housing.

Although there is a discrepancy between the goals set by the Novogradac study to ensure that the current population has its housing needs met and the goal set by the City to maximize the redevelopment of vacant lots, the City believes that the amount of funding allocated toward housing activities in its first round of CDBG-DR funding adequately addresses the known housing demand at this point.

INFRASTRUCTURE IMPACT AND UNMET NEEDS

The City's previous round of CDBG-DR funding was allocated to infrastructure based on the immediate assessment of public infrastructure and infrastructure systems that were damaged due to the May 22nd tornado. Since that time, additional assessments have occurred to update the unmet infrastructure needs inside the tornado-affected area. In furthering the effort to ensure that the tornado-affected area is as attractive as possible to returning and new residents, these projects will ensure that all residents have the benefit of infrastructure that will enhance the quality of life and protect property. These projects will include repairs necessary due to direct storm damage, damage from recovery efforts, and will further enhance systems to attract residents to repopulate the area.

Mental Health

For two years Joplin Schools has been able to help meet the social and emotional needs by having ancillary professional staff to help students and families still suffering the effects of the tornado. This funding, however, is expected to decrease this upcoming year.

Currently Joplin Schools has 7,400 students and approximately 1,200 staff. Referrals from students, parents and staff have assisted us with the identification of distressed students, as have disciplinary referrals, attendance and grade data. In Academic Year 2011-2012 mental health professionals employed by Ozark Mental Health Center served over 2,200 children in our schools while referring many for individual professional counseling in the community. Many students were on long wait lists and needed the support of the school.

This year over 1300 students were served by Project HOPE direct mental health interventions. We have successfully kept students in the regular classroom environment avoiding special education by supporting teachers with strategies to prevent educational disruptions.

The School District has provided the above data and the conclusion of research reinforce the need for continued support. Joplin School District anticipates needing 8 mental health professionals to meet the needs of at least 1,000 students expected to be underserved by current resources.

Storm Sewer

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 our existing storm water system and estimated replacement costs on undersized, damaged, or otherwise inadequate lines and inlets. 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. Stormwater projects will be completed prior to paving activity to minimize damage to new pavement.

Sanitary Sewer

As with storm sewers, the tornado and ensuing heavy equipment caused significant damage to the manhole and sanitary sewers across the tornado recovery area.

All EDR area sanitary sewers were videoed, measured, and rated from 1-5, 1 being best condition and 5 being the worst condition. We extrapolated those rankings and percentages across the entire tornado area. We estimated approximately $12 million for repairing the category 3 and above lines which are comprised of approximately 444,000 linear feet of Sanitary Sewer. The project also involves repairing all manholes in the tornado area, of which there are approximately 1,700.

Curb & Gutter

Staff code enforcement officers surveyed the area to determine extent of tornado damage and ensuing heavy equipment damage to curbs and gutter due to debris removal. Roughly 700,000 linear feet of curb and gutter is damaged. Staff has the least invasive approach is to partially remove the curb and replace with an S-Curb, or a stand-up curb in lieu of removing and replacing the entire curb and gutter. This will expedite the process and result in less disturbance on areas already paved.

Sidewalks

Staff analyzed city aerials and determined which areas of the tornado area had sidewalks on both sides, one side, or none. Pre-tornado, there were 658,096 feet in the tornado area that did not have sidewalks, 321,120 feet that had sidewalk on both sides, and 38,178 feet that only had sidewalk on one side.

Staff code enforcement officers surveyed the area that had sidewalk on one or both sides to determine condition. After the survey, it was determined that there are 116,193 feet in the tornado area that were severely damaged and needed immediate replacement. Added to the 658,096 feet without sidewalks and the 38,178 feet to add a sidewalk on both sides in areas with only one sidewalk, we have a need of 812,467 feet of sidewalk to be installed or replaced in the tornado area.

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 90 percent, or 500 businesses, are back in operation. Thirty businesses have indicated that they will not rebuild/reopen.

Between 4,500 and 5,000 employees were affected by the tornado but approximately 3,000 were kept on payroll in some capacity, 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. This number is lower than the previously reported 90 percent in the City's Round I of CDBG-DR funding.

The following table represents the most impacted businesses by Business Type and NAICS code:

Business Type	NAICS Code	Count
Medical Facility/Offices	621	148
Restaurants/Food Services	722	41
Religious/Civic	813	33

Overall, the local economy is fairly strong although smaller businesses are still struggling. For smaller companies, it is nearly impossible to get resources, yet they are the ones with the least capacity to pay for quality training and growth. The City is working with the Joplin Area Chamber of Commerce to dedicate CDBG-DR funds to Job Training available to small businesses. This activity has not been fully developed and is thus not included in this Partial Action Plan.

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.

In an effort to address the affected employees that were not kept on payroll in some capacity, the City is also working with the Joplin Area Chamber of Commerce to develop a program that would help expand infrastructure in one of the City's Industrial Parks that sustained damages in the May 22nd Tornado. 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) was present in Joplin since the beginning of the rescue operations and continues into the recovery process.

FEMA Assistance (as of May 15, 2013):

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 provided direct, temporary housing to **586 households** occupying temporary housing units, among **15** sites throughout the metro Joplin area. *As of June 9, 2013* - **586 households (100%) have moved out** of FEMA temporary housing and into longer term or permanent housing.

- FEMA has provided more than **$4.8 million** to help fund crisis counseling services through community-based outreach and short-term interventions. The services help disaster survivors review their recovery options, discuss their reactions and learn coping strategies.
- The U.S. Small Business Administration (SBA) has approved more than **$43.4 million** in

low-interest disaster loans for **521** tornado-impacted individuals, businesses and not-for-profits. SBA provides these loans to help cover property losses. In addition, SBA provides economic injury loans (working capital) for eligible businesses.

1. 417 low-interest disaster loans to homeowners for $26.8 million
2. 100 low-interest disaster loans to businesses for $16.4 million
3. low-interest disaster loans to not-for-profits for $256,400

Public Assistance:

- 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.

- FEMA expects to spend **nearly $150 million*** in both counties to help remove debris, provide emergency protective measures and to permanently repair or replace public buildings and infrastructure damaged or destroyed by the tornado. **About $20 million** of this amount will help fund eligible recovery costs for the City of Joplin; about **$2.5 million** for the City of Duquesne. So far, about **$97.5 million** has been paid to the State of Missouri for disbursement to **25** eligible entities, including local governments, school districts and critical facilities such as hospitals.

** Funding subject to change based eligibility review process and potential insurance proceeds. Does not include costs for U.S. Army Corps of Engineers Debris Removal operations.*

Insurance Statistics

Losses as of October 31, 2012:
Provided by Missouri Department of Insurance, Financial Institutions, and Professional Registration

Line of Business	Claims Received	Claims Expected	Losses Paid	Losses Incurred
Commercial Property	2,142	2,159	$986,829,440	$1,320,220,325
Residential Property	8,647	8,784	$535,724,886	$554,388,779
Commercial Auto	309	309	$4,377,076	$4,783,049
Private Auto	6,982	7,117	$47,898,047	$51,084,766
Other Commercial	313	315	$15,031,287	$19,210,900
Total	**18,393**	**18,683**	**$1,589,860,736**	**$1,949,687,819**
County Mutuals	1,477	1,516	$61,789,887	$67,876,781
Total	**19,870**	**20,199**	**$1,651,650,623**	**$2,017,564,600**

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 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 City believes that the amount of funding allocated toward housing activities in its first round of CDBG-DR funding adequately addresses the known housing demand at this point. A summary of those activities found in the first round of funding is listed below:

Program	Funding (Previous Award)	Unit Estimates
Direct Homeownership Assistance	$12,750,000	Minimum 400
Multi-family Residential	$9,000,000	Approximately 500
Single Family Rehabilitation	$1,500,000	Approximately 100

In furthering the effort to ensure that the tornado-affected area is as attractive as possible to returning and new residents, the planned infrastructure projects will ensure that all residents have the benefit of adequate infrastructure that will enhance the quality of life and protect property. These projects will include repairs necessary due to direct storm damage, damage from recovery efforts, and will further enhance systems to attract residents to repopulate the area.

Program	Funding This Round	Estimated Final Funding	Unit Estimates
Sidewalk Reconstruction	$ 588,000	$11,400,000	Approximately 812,000 feet
Sanitary Sewer	$ 4,500,000	$12,000,000	Approximately 444,000 feet
Storm Sewer	$ 2,381,400	$17,500,000	34 Separate Projects
Curb & Gutter	$ 393,000	$ 7,700,000	Approximately 700,000 feet

Although the City has identified the activities above, it is anticipated that future projects will be identified and included in additional Partial Action Plans that will assist in providing infrastructure and public facility resources to the residents that will encourage a repopulation of the tornado area. The City is focused on providing as much funding as possible to make this portion of the community an area that will attract residents now and in the future.

The City is also working with the Joplin Area Chamber of Commerce to dedicate CDBG-DR funds to Job Training available to small businesses. This activity has not been fully developed and is thus not included in this Partial Action Plan.

In an effort to address the affected employees that were not kept on payroll in some capacity, the City is also working with the Joplin Area Chamber of Commerce to develop a program that would help expand infrastructure in one of the City's Industrial Parks that sustained damages in

the May 22nd Tornado. This will help bring the employment level back to the pre-tornado levels as well as provide important resources for the residents.

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. For property owners that do choose to build in the floodplain, the City will continue to follow its floodplain management ordinances which meet the FEMA standards for this type of activity.

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 its 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.

The City updated its Comprehensive Plan in 2012 which took into consideration the CART recommendations as well as many other post-recovery efforts. The 2012 Comprehensive Plan will be used to guide development in the City for future years and there is a strong coordination between these CDBG-DR Action Plan and that Comprehensive Plan. The City is also an active member of the Joplin Area Transportation Study Organization, the MPO for the region, and coordination with this group has also been consistent.

LEVERAGING OF FUNDS

The City has made an effort to design the activities included in this plan to maximize the benefit that will be realized by Low-Moderate Income individuals. In doing this, the City identified projects that had recovery needs outside of LMI areas and has assigned other fund sources to as much of these areas as possible. The following table is a summary of local/state/other funds that will be leveraged to complete the overall recovery in these activities. The amounts shown for CDBG-DR funding represent the total amount anticipated for each activity including future rounds of construction that will appear in future partial Action Plans.

Program	Anticipated Total CDBG-DR Funding	Anticipated Local/State/Other Funding
Sidewalk Reconstruction	$11,400,000	$ 9,600,000
Sanitary Sewer	$12,000,000	$ 0
Storm Sewer	$17,500,000	$ 0
Curb & Gutter	$ 7,700,000	$ 7,000,000
Mental Health	$ 500,000	$ 124, 770
TOTAL	**$ 49,100,000**	**$ 16,724,770**

USE OF QUALITY CONSTRUCTION METHODS & GREEN BUILDING

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.

The City's Plan does not include the construction or rehabilitation of residential buildings and the City does not anticipate adding these activities in the future. According to the current Needs Assessment, this has been addressed in the City's previous award. Because disaster recovery is an every-changing process, however, the City will ensure to include criteria and requirements for Green Building Standards and HUDS CPD Green Building Retrofit Checklist in any future residential activity according to the applicable CPD notices.

PUBLIC HOUSING, HUD-ASSSISTED HOUSING & HOUSING FOR THE HOMELESS

The City's Housing Task Force and Housing & Neighborhood Sector of the CART process have been the main conduits through which the City has tracked the progress of Public and HUD-Assisted Housing. HUD and Joplin Housing Authority representatives have both been involved in these groups throughout the recovery and have provided constant information regarding the recovery of these resources.

According to the most recent data provided by these agencies, rehabilitation and replacement of all damages/destroyed facilities in this category have either occurred or are near completion of construction. Although this successful recovery has occurred, the Joplin Housing Authority has provided input that there is a need for assistance in the Housing Choice Voucher program. There is currently a lack of funding for vouchers that are needed in the community. Because the current year's allocation was based on the demand during the period of time directly following the tornado, the funding is lower than pre-tornado levels. The City is currently working with the Joplin Housing Authority to develop a program that is acceptable to HUD's Community Planning & Development office as well as its Public and Indian Housing office. This funding will be addressed in the previous round of funding rather than this Action Plan.

The City is unaware of any McKinney-Vento funded shelters that have an outstanding need for recovery assistance. The appropriate amount of funding for all known outstanding needs has been included in the City's previous $45 Million allocation.

ADEQUATE (& DISASTER RESISTANT) HOUSING FOR ALL INCOMES

As previously mentioned, the City's housing assessment indicates that the funding allocated in the City's first award of $45 Million is adequate to address the housing needs of all Income levels. The City has successfully completed its Temporary Housing mission with FEMA which

includes working through case management with all families to ensure that permanent resources were identified.

The City did amend its previous plan to extend Temporary Housing through a non-profit agency to a limited number of households. Through allocating funds to low-income rental housing, the City is adequately addressing the need identified by its Housing Study as well as its consultation with the Joplin Housing Authority. 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 Housing Activities in the previous Action Plan will promote affordable housing dispersed throughout the community which will include areas that are low poverty and non-minority areas. The tornado area did have a high poverty concentration and thus it will be natural that housing activities will need to be placed in these areas. However, in an effort to disperse concentrations some of the proposed Multi-family activities will also allow for and promote the development of mixed-income developments.

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

The City 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

PROGRAM INCOME

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 not expected from any of the activities listed in this plan.

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 on a provided certification form. This form will list FEMA, SBA, Insurance, and an "Other" category to ensure that all possible duplications are fully disclosed by the applicant.

Based on a comparison of the amount of assistance previously received and the amount of assistance requested by the applicant, the City and/or its subrecipients will determine the unmet needs before awarding assistance. The personnel responsible for this task will be the agency that is processing the applications. A statement is included in the Duplication of Benefits verifications that the applicant agrees to repay any assistance that is found to be duplicative.

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 City's Finance Department does not contain an Internal Auditor. However, 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 and/or at-desk monitoring of files will be conducted according to the nature and

scope of the project. These monitoring events will address Exhibits 3-1 through 3-22 of the CPD Grantee Monitoring Handbook as applicable. Topics will include Eligibility, National Objective, Rehabilitation, Economic Development, Overall Management, Financial Management, Cost Allowability, Procurement, and review of Equipment Management. Not all topics will be monitored every year, but rather, these topics will be addressed according to the risk assessed by staff. Random monitoring will occur at a minimal of an annual basis based on risk of the current activities. 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.

PROCEDURES TO DETECT FRAUD, WASTE, AND ABUSE OF FUNDS

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 below. 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.

The City has reserved funding in the Administration funds for local costs. These funds have been used to create an additional CDBG Manager position to increase the local capacity and it is possible that this funding could be used to add staff if determined necessary in the future.

The City of Joplin has also 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 either:
    a) Increase/Decrease funding by $100,000 for a single activity; or
    b) Increase/Decrease the physical size of a project by 10% or greater.

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 finalized minor amendments will be posted on the City's website.

IV. PROGRAM DESCRIPTIONS

MENTAL HEALTH PROGRAMS

Program/Activity Details

Administering Entity:	Joplin School District
Budget:	$332,730.00 (CDBG) / $124,770.00 School District
Geographic Area:	Joplin School District (parts of Jasper/Newton County)
Applicant Eligibility:	Any individual in need of programs as determined by School District Staff
Start/End Dates:	November 2013 – June 2014
Performance Outcomes:	Approximately 1,000 Students assisted

Budget Details:

STAFF	Salary + Benefits for 11 Months	Joplin School 3 months Funded	CDBG Request – 8 Months
1 FTE Director:	$78,000.00	$21,270.00	$56,730.00
3 FTE Mental Health Counselors:	$203,500.00	$55,500.00	$148,000.00
4 FTE School/Family Liaisons (formerly Case Managers and Check & Connect):	$176,000.00	$48,000.00	$128,000.00
Total:	$457,500.00	$124,770.00	$332,730.00

Basis for Allocation

For two years Joplin Schools has been able to help meet the social and emotional needs by having ancillary professional staff to help students and families still suffering the effects of the tornado. After the tornado, we, the leaders of Joplin Schools, quickly came to understand the extent to which many students and staff had been traumatized. The lives of our children, their families, and the staff had been changed forever. Returning to the "daily business" of successfully educating children would require more extensive support and expertise than that in place in the pre-tornado school world. Based on the experience of others who had undergone similar disasters, national consultants and the research literature on overcoming trauma, we anticipated one half to a third of our students and staff might experience Post Traumatic Stress Disorder (PTSD) or symptoms of trauma-related anxiety, fear, confusion, and/or depression severe enough to require direct attention. As we investigated those similar situations, we also learned the psychological effect of trauma could become deep-rooted and reoccurring.

Currently Joplin Schools has 7,400 students and approximately 1,200 staff. Referrals from students, parents and staff have assisted us with the identification of distressed students, as have disciplinary referrals, attendance and grade data. In Academic Year 2011-2012 mental health professionals employed by Ozark Mental Health Center served over 2,200 children in our schools while referring many for individual professional counseling in the community. Many students were on long wait lists and needed the support of the school.

This year over 1300 students were served by Project HOPE direct mental health interventions. We have successfully kept students in the regular classroom environment avoiding special education by supporting teachers with strategies to prevent educational disruptions. Families of students have been helped with avoiding homelessness from resource linkages in the community. Emergency assistance has been provided for vital psychological medication for students. Therapy groups have been formed to meet the needs of students to reduce anger and aggression, self-harm, and violent relationships. These groups have helped students to set a path of healthy relationships for their future. Our mental health professionals have collaborated with Mercy Hospital at their community dinners. We have connected with over 300 Joplin Schools' families during these dinners.

Additionally, Check and Connect - a dropout prevention program - was implemented by 5 case managers. They worked with over 100 secondary level students and their families to remediate barriers to school attendance and academic success.

Since these data and the conclusion of research reinforce the need for continued support, we anticipate needing 8 mental health professionals to meet the needs of at least 1,000 students we believe will need services.

CDBG Eligibility and National Objective
This Activity is eligible under 05O, Mental Health Services, and will utilize the National Objective of Low-Moderate Income Clientele. The Joplin School District will collect Income documentation from each family assisted through their programs to ensure that 51% of the families are considered Low-Moderate Income.

Long-term Recovery from Specific Disaster
Our future goal is to continue with professional mental health counseling, case management and dropout prevention strategies. Additionally we desire to develop strong social and emotional skills within the general curriculum so that all students will have resiliency strategies for use in their future. As the home environment sets the stage for school success, we desire to build stronger partnerships with parents, especially those who are experiencing social and emotional distress.

STORM-WATER IMPROVEMENTS (DESIGN ONLY)

Program/Activity Details

Administering Entity:	City of Joplin / Hired Contractor
Budget:	$ 2,381,400.00
Geographic Area:	City of Joplin; Tornado Area
Applicant Eligibility:	N/A; Public Infrastructure
Start/End Dates:	October 2013 – October 2015
Performance Outcomes:	Design for a project to result in the completion of 34 separate Improvement/Facility Projects

Basis for 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.

SANITARY SEWER IMPROVEMENTS (DESIGN & CONSTRUCTION PHASE 1)

Program/Activity Details

Administering Entity:	City of Joplin / Hired Contractor
Budget:	$ 4,500,000.00
Geographic Area:	City of Joplin; Tornado Area
Applicant Eligibility:	N/A; Public Infrastructure
Start/End Dates:	October 2013 – October 2015
Performance Outcomes:	Reconstruction of approximately 230,000 linear feet of sewer and 900 manhole structures

Basis for Allocation

As with storm sewers, the tornado and ensuing heavy equipment caused significant damage to the manhole and sanitary sewers across the tornado recovery area.

The city has an annual capital program that repairs and replaces sanitary sewers and the annual budget is $1.5 million, which is currently being used primarily to clean and TV the entire system as per DNR bypass elimination plan and for I&I reduction projects in portions of the Turkey Creek collection system that have the highest metals levels as a requirement of the operating permit for Turkey Creek WWTP. All EDR area sanitary sewers were videoed, measured, and rated from 1-5, 1 being best condition and 5 being the worst condition. We extrapolated those rankings and percentages across the entire tornado area. Using comparable bids from a neighboring town, cost was calculated at approximately $12 million for repairing the category 3 and above lines. Estimates and ranking scale, as well as the sewers in the tornado area, are included as a part of this work. The work involves cleaning and TV inspection of the remaining lines in the tornado area to determine exact project scope, similarly to what was done for the EDR portion of the project. The project also involves repairing all manholes in the tornado area, of which there are approximately 1700. The repair of the sewer lines is anticipated to be slip-lining the pipe with occasional replacement in areas that cannot be navigated by the slip lining process. The intention is to complete as many storm sanitary projects as possible prior to paving activity to minimize damage to new pavement.

CDBG Eligibility and National Objective

This Activity is eligible under 03J, Water and Sewer 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 sanitary sewer service as well as significant reductions in Infiltration and Inflow (I/I). Having an upgraded and modernized sewer system reduces I/I and also extends the life of our treatment plants, as well as reduces the number of sewer backups into citizens' households after large rain events. The city will have a well mapped system with a ranking to identify future preventative maintenance needs. In combination with annual capital

funds in 2013, this funding will result in 30% I/I reduction of the city's sewers being newly repaired or replaced. In addition, the Department of Natural Resources has a storm water management program which requires modernization to reduce I/I. This upgrade to our system will position us in better compliance with state regulation and will ultimately reduce citizen user fees.

CURB & GUTTER IMPROVEMENTS (DESIGN ONLY)

Program/Activity Details

Administering Entity:	City of Joplin / Hired Contractor
Budget:	$ 393,000.00
Geographic Area:	City of Joplin; Tornado Area
Applicant Eligibility:	N/A; Public Infrastructure
Start/End Dates:	October 2013 – October 2015
Performance Outcomes:	Design for a project to result in the reconstruction of approximately 700,000 linear feet of curb and gutter

Basis for Allocation

Staff code enforcement officers surveyed the area to determine extent of tornado damage and ensuing heavy equipment damage to curbs and gutter due to debris removal. Roughly 700,000 linear feet of curb and gutter is damaged. Staff has the least invasive approach is to partially remove the curb and replace with an S-Curb, or a stand-up curb in lieu of removing and replacing the entire curb and gutter. This will expedite the process and result in fewer disturbances on areas already paved. The estimated cost for saw cutting, removal and replacement of curb is $20/linear foot.

CDBG Eligibility and National Objective

This Activity is eligible under 03K, Street 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 aesthetics of streets and private property frontage while improving stormwater capture and management through neighborhoods and commercial areas. Improving the stormwater capture as well as directing it appropriately, helps us with our permitting, not only for stormwater, but efficient stormwater management reduces Infiltration and Inflow (I&I) in the sanitary sewer system as well, thus having a significant cumulative effect and cost benefit.

SIDEWALK & ADA RAMP CONSTRUCTION AND RECONSTRUCTION (DESIGN ONLY)

Program/Activity Details

Administering Entity:	City of Joplin / Hired Contractor
Budget:	$ 588,000.00
Geographic Area:	City of Joplin; Tornado Area
Applicant Eligibility:	N/A; Public Infrastructure
Start/End Dates:	October 2013 – October 2015
Performance Outcomes:	Design for a project to result in the reconstruction of approximately 800,000 linear feet of sidewalk

Basis for Allocation

Staff analyzed city aerials and determined which areas of the tornado area had sidewalks on both sides, one side, or none. Pre-tornado, there were 658,096 feet in the tornado area that did not have sidewalks, 321,120 feet that had sidewalk on both sides, and 38,178 feet that only had sidewalk on one side.

Staff code enforcement officers surveyed the area that had sidewalk on one or both sides to determine condition. After the survey, it was determined that there are 116,193 feet in the tornado area that were severely damaged and needed immediate replacement. Added to the 658,096 feet without sidewalks and the 38,178 feet to add a sidewalk on both sides in areas with only one sidewalk, we have a need of 812,467 feet of sidewalk to be installed or replaced in the tornado area. At $20/Lineal Foot this highlights $16,249,340 needed for sidewalks.

In addition, almost every ADA ramp surveyed is not in compliance and most intersections do not have ramps at all. There are 416 intersections in LMI areas, each with 4 corners providing 1,664 ADA ramps needed. At $2000/ramp gives us $3,328,000 needed for ADA ramps inside the LMI area.

This will maximize our CDBG usage in the tornado area for ADA. The other ramps outside the LMI areas will be done with the curb and gutter money from the state. A significant number of street curb and gutters were heavily damaged during debris removal process and will be replaced through this process as well.

CDBG Eligibility and National Objective

This Activity is eligible under 03L, Sidewalks, 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.

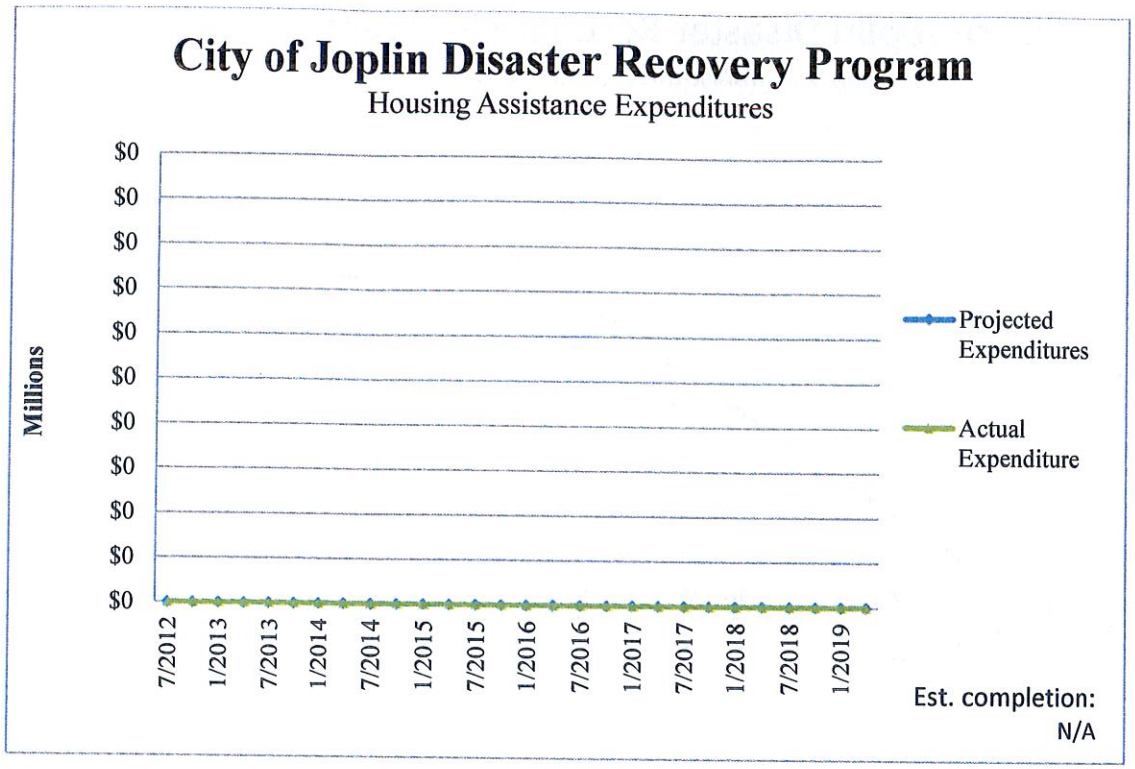
Long-term Recovery from Specific Disaster

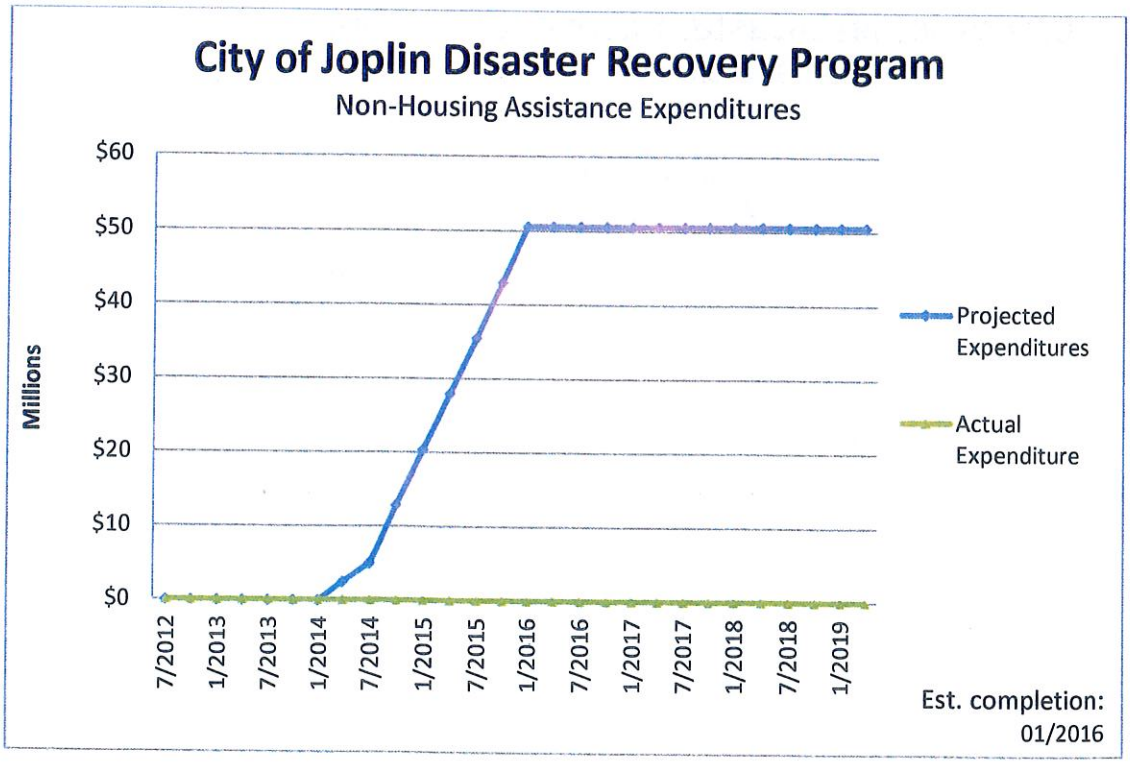
This project will dramatically improve the quality of life as sidewalks are the backbone of a multi-modal pedestrian access network to the new trails through neighborhoods to major retail and commercial destinations and services. Having newly installed sidewalks and modernized ADA compliant ramps at intersections conforms to the newly adopted *Comprehensive Plan 2012*

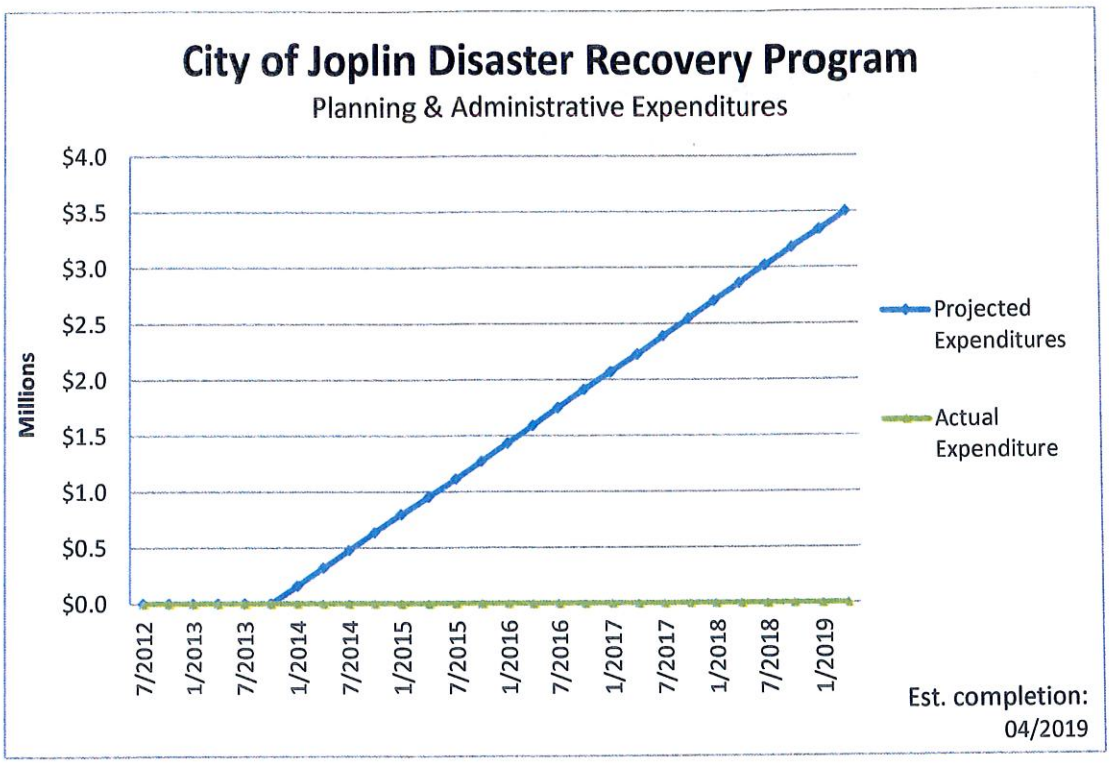
and also meets the needs expressed by residents as identified in the Citizens Advisory Recovery Team's *Implementation Next Steps*.

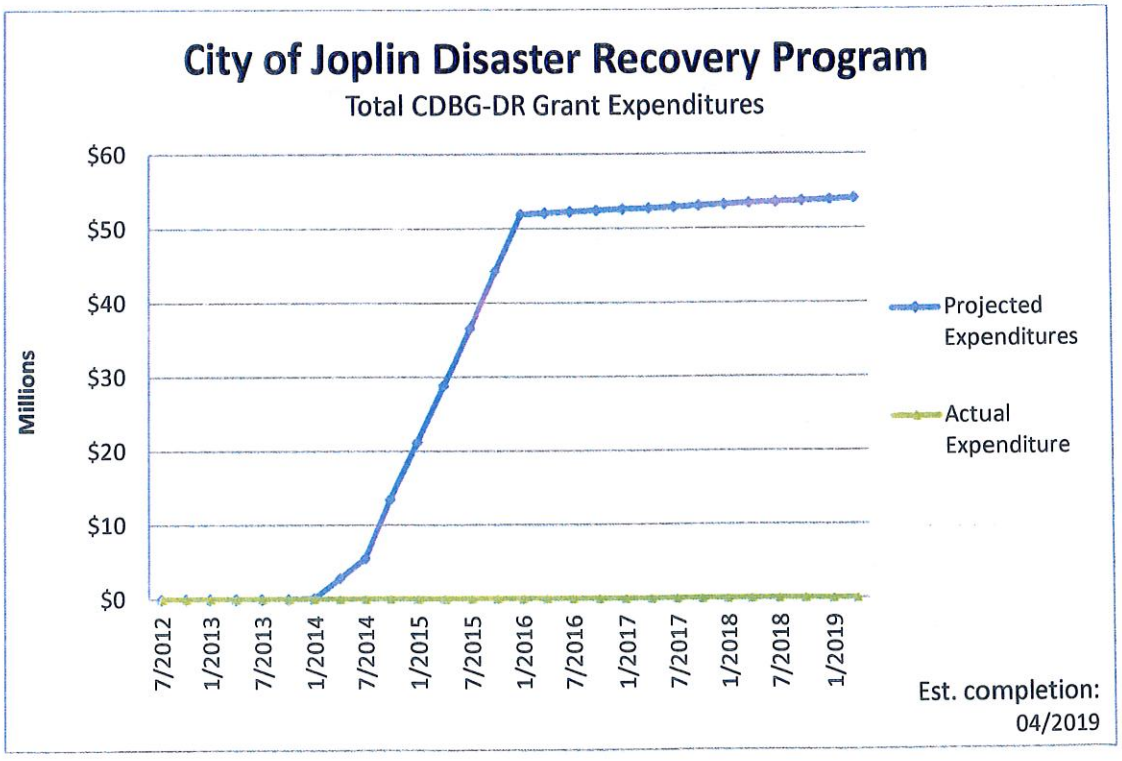
V. PERFORMANCE SCHEDULES

The following tables illustrate the approximate projected expenditures based on HUDs recommendations of Housing, Non-housing, and Administration categories. The City does not anticipate funding any Housing activities with this round of funding.

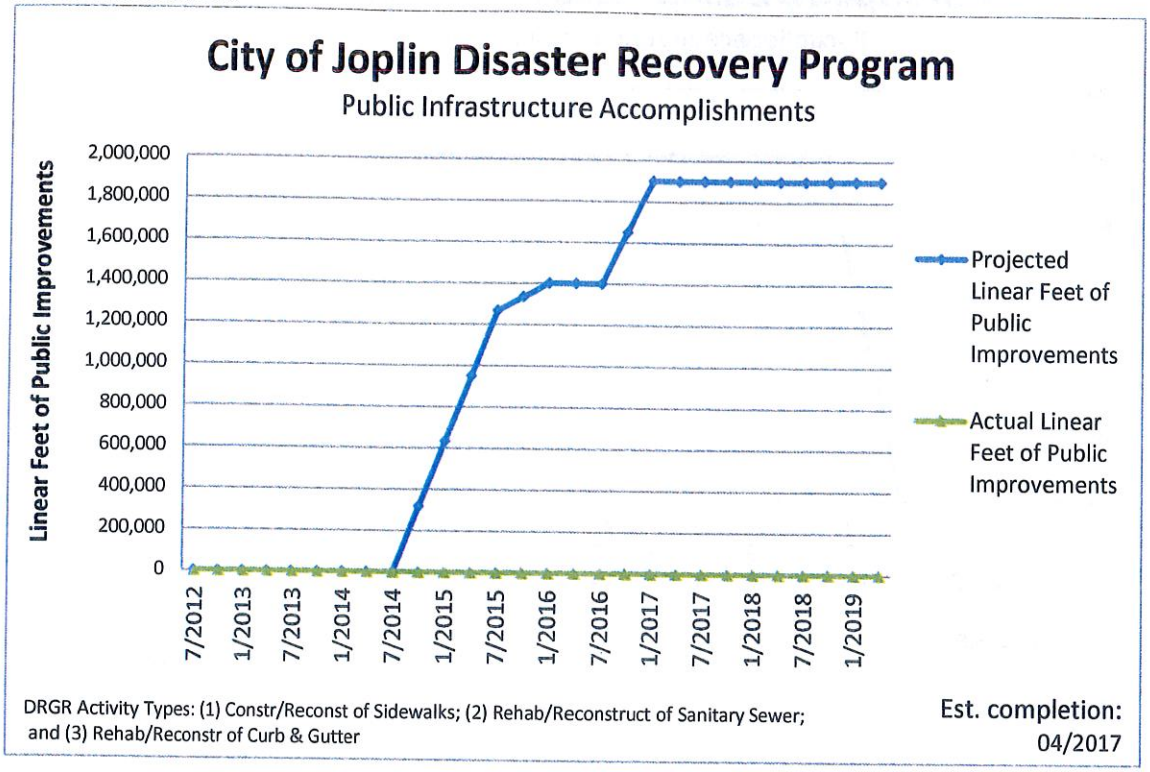

City of Joplin Disaster Recovery Program
Housing Assistance Expenditures
Millions
$0
$0
$0
$0
$0
$0
$0
$0
$0
$0
7/2012
1/2013
7/2013
1/2014
7/2014
1/2015
7/2015
1/2016
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
Projected Expenditures
Actual Expenditure
Est. completion: N/A

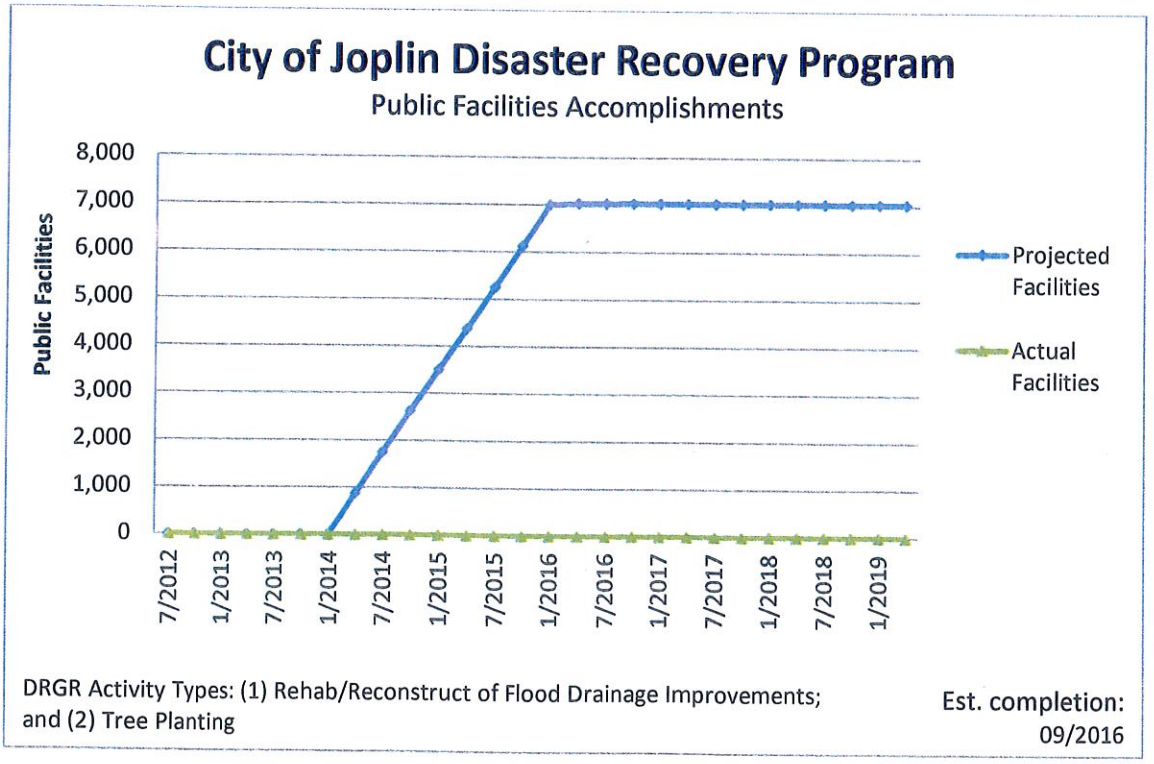

City of Joplin Disaster Recovery Program
Non-Housing Assistance Expenditures
Millions
$60
$50
$40
$30
$20
$10
$0
7/2012
1/2013
7/2013
1/2014
7/2014
1/2015
7/2015
1/2016
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
Projected Expenditures
Actual Expenditure
Est. completion: 01/2016

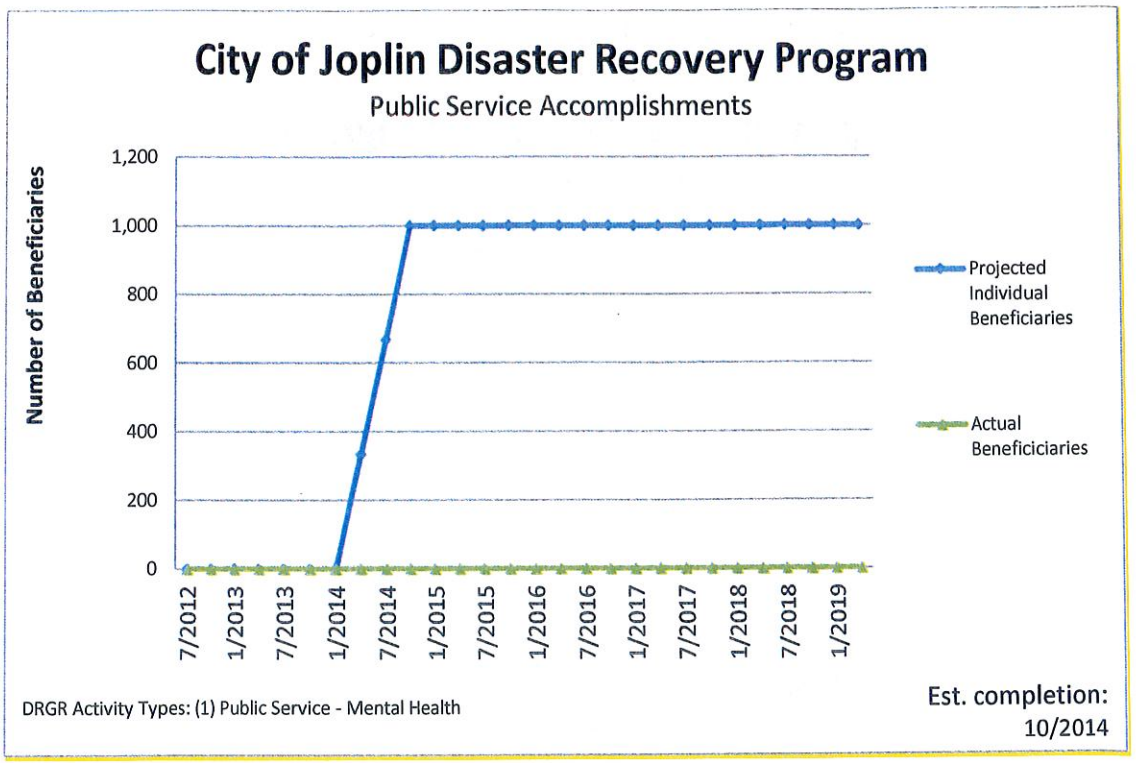

City of Joplin Disaster Recovery Program
Planning & Administrative Expenditures
Millions
$4.0
$3.5
$3.0
$2.5
$2.0
$1.5
$1.0
$0.5
$0.0
7/2012
1/2013
7/2013
1/2014
7/2014
1/2015
7/2015
1/2016
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
Projected Expenditures
Actual Expenditure
Est. completion: 04/2019


City of Joplin Disaster Recovery Program
Total CDBG-DR Grant Expenditures
Millions
$60
$50
$40
$30
$20
$10
$0
7/2012
1/2013
7/2013
1/2014
7/2014
1/2015
7/2015
1/2016
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
Projected Expenditures
Actual Expenditure
Est. completion: 04/2019

The outcome measures for each activity grouping are also found according to HUDs recommendations.






City of Joplin Disaster Recovery Program
Public Service Accomplishments
Number of Beneficiaries
1,200
1,000
800
600
400
200
0
7/2012
1/2013
7/2013
1/2014
7/2014
1/2015
7/2015
1/2016
7/2016
1/2017
7/2017
1/2018
7/2018
1/2019
Projected Individual Beneficiaries
Actual Beneficiciaries
DRGR Activity Types: (1) Public Service - Mental Health
Est. completion: 10/2014

VI. BUDGET

COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY
Round II Partial Plan #1 – Initial Budget

Infrastructure Activities	
Sidewalk Reconstruction/Construction (Design Only)	$ 588,000.00
Sanitary Sewer (Design & Construction Phase 1)	$ 4,500,000.00
Storm Sewer (Design Only)	$ 2,381,400.00
Curb & Gutter (Design Only)	$ 393,000.00
Sub Total	**$ 7,862,400.00**
Economic Development	
Sub Total	**$ 0.00**
Housing Activities	
Sub Total	**$ 0.00**
Public Service Activities	
Mental Health Needs (Joplin School District)	$ 332,730.00
Sub Total	**$ 332,730.00**
Program Administration Activities	
City of Joplin Administrative Costs	$ 101,951.30
Description: Pro-rata share of salary and benefits of Planning/ Community Development staff plus overhead including supplies, rent, etc	
Consultant Administrative Costs	$ 327,805.20
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 = $431,244.32)**	
Program Planning Activities	
Planning Activities (15% max. = $6,790,006.35)	$ 0.00
Sub Total (20% maximum)	**$ 429,756.50**
TOTAL BUDGETED CDBG-DR AWARD (of $113,276,000.00)	**$ 8,624,886.50**

VII. PUBLIC COMMENT

The City of Joplin provided prominent posting on the City's official website beginning on August 9, 2013 indicating written comments would be accepted through August 19th at 5pm. The City also presented the activities and funding amounts for the entire $113 Million allocation to the Joplin City Council and to the general public on the Council Meeting on June 17, 2013 and July 1, 2013.

One comment was received from the Joplin Housing Authority during the City's 7-day comment period. A summary of the comment and the City's Response is noted below.

Joplin Housing Authority Comment Summary

1) **HOUSING AUTHORITY COMMENT**
The Housing Authority wished to clarify that they have submitted a request for rental assistance as well as for property repairs (parking lots and general landscaping) that were not covered by property insurance or FEMA.

CITY RESPONSE
The City was aware of these requests that were made verbally before an official written response was made. Although the Housing Authority's written request was received (on August 7, 2013) after the majority of the preparation for this Action Plan occurred, the City has continued to research all items in the request. This research included the Rental Assistance mentioned in this Action Plan as well as the parking lot and landscaping needs of the facilities. The City is currently in discussions with its consultant and with HUD to determine what items in the request would be eligible. At this point, the City anticipates that whatever portion of these requests are deemed to be eligible will be covered with funds from the City's Round I ($45M) CDBG-DR funding.

2) **HOUSING AUTHORITY COMMENT**
The JHA is authorized for 497 Housing Choice Vouchers and 35 Veterans Affairs Supportive Housing Vouchers. There was a greate difficulty in using these vouchers after the tornado because of the shortage of housing available to be part of the affordable housing market. With the addition of new MHDC tax-credit units in the past year, the Joplin market loosened up and leasing rates have risen although all vouchers are still not utilized. Through use of a post-tornado agreement, the JHA is still using some of its vouchers outside of the City Limits.

When combining the budget for the City's first round ($45M) and the City's second round ($113M), the amount dedicated to housing activities is $31.75 million which is about 20% of overall funds awarded. There is muchof the remaining budget committed to infrastructure though, which is needed of course and will help to support any housing efforts.

All of the City's proposed projects have merit and 20% may be an appropriate amount

to go toward housing activities, but it's not clear to me how that decision is being made. The author of the Action Plan admits that "there is a discrepancy between the goals set by the Novogradac (housing study consultant) study to ensure that the current population has its housing needs met and the goal set by the City to maximize the redevelopment of vacant lots", going on to say that "the City believes that the amount of funding allocated toward housing activities in its first round of CDBG-DR funding adequately addresses the known housing demand at this point". It appears that the City has decided to commit less to housing activities than Novogradac suggests is needed. If the City's decision about funding for housing activities is based on a study performed in 2011, or on a study performed more recently but without input from all appropriate community partners, I would recommend a new study be performed (by Novogradac or another expert).

CITY RESPONSE

The City did utilize a 2011 Novogradac Housing Study as well as a 2012 update to that study to inform its decisions on level of housing funding. This updated study does include the interviews with community partners that were mentioned by the Housing Authority to occur in June of 2012. However, the comment that the City has decided to commit less to housing activities than Novogradac suggested is actually the opposite of what occurred. The following quoted portion of the plan, "there is a discrepancy between the goals set by the Novogradac (housing study consultant) study to ensure that the current population has its housing needs met and the goal set by the City to maximize the redevelopment of vacant lots", was meant to show that the city actually allocated more funds to housing activities in the Round I ($45M) Action Plan than were recommended in the 2012 Novogradac Study.

The City was comfortable in doing this because it took a stance to provide a large amount of funding that would be utilized on a demand-basis through the Joplin Homebuyer's Assistance Program (J-HAP). This program is designed to help attract individuals to the area and to repopulate the vacant lots mentioned in the above quote. In funding this demand based activity, the City felt confident that it could address the demand for the Novogradac study and allow for potential population growth and repopulation of the tornado-affected area without overbuilding the housing market.

3) HOUSING AUTHORITY COMMENT

The Housing & Neighborhoods Sector of the Citizens Advisory Recovery Team (CART) is referenced in the Action Plan. This group is (or was) a cross-section of housing-related experts and professionals, and the members are a good resource for discussions about planning. I was a Co-Chair of the committee as it became part of CART, but we had started assembling prior to the CART effort and were already involved individually in overall recovery efforts by then. We were very active for a year after the tornado, but haven't met as a group (to my knowledge) since September of 2012.

CITY RESPONSE

The CART was mentioned in this Action Plan in order to recognize the efforts of the many professionals that worked hard to create the CART's Next Steps Plan. This plan has been and continues to be a guiding document for the City in its efforts for redevelopment. The City appreciates the efforts that were made and will continue to consult with the individual members as recovery continues.

4) HOUSING AUTHORITY COMMENT

Many of the tornado-affected blocks in the neighborhoods where Habitat For Humanity and other non-profit organizations have been able to replace homes, which are in the core of the community, appear to have lots that could be part of a planned effort to finish the neighborhoods. I am not aware of such an effort and have concerns that the private homebuilding market may not provide finished neighborhoods in those areas for a long while. Members of the Housing & Neighborhood Sector would be a good group to consult (collectively or independently) for planning such an effort. The Housing Authority would likely be willing to partner as needed (and feasible and eligible).

CITY RESPONSE

A planned effort to finish the in-fill of redeveloping neighborhoods is a legitimate idea. This is something that the City is willing to consider and would welcome further detail on such a plan. At this point, the City's J-HAP program is the avenue through which the City is attempting to have a similar effect. While the program does not dictate exactly which lots the homebuyer's are to build, all funding is directed in the Tornado Path area. This program was developed after careful consideration of multiple factors that include increased management, administrative, and labor costs for activities that would fund the actual construction of units rather than assisting in the purchase of units through a Homebuyer's Assistance Program.

VIII. ACCESSIBILITY OF PLAN

The City of Joplin will make this plan available to all individuals including those with disabilities and those that are non-English speaking. Services will be provided upon request. Requests can be made by contacting our ADA Coordinator at 624-0820, Ext 210, or the City Clerk's Office at 624-0820, Ext 220. Kindly give us forty-eight (48) hour notice to arrange for the aids or service. TTD Number: (417) 625-4774.

IX. 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. In addition, the grantee certifies that agreements with subrecipients will meet all civil rights related requirements pursuant to 24 CFR 570.503(b)(5).

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 program.

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 this notice 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 of 24 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 the aftermath of Hurricane Sandy, 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 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. The relevant data source for this provision is the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

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.

P. Financial Controls – The grantee certifies that it has reviewed the requirements of this Notice and requirements of Public Law 113-2 applicable to funds allocated by this Notice, and that it has in place proficient financial controls and procurement processes and has established adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, to maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, and to detect and prevent waste, fraud, and abuse of funds.

_____ _____

Signature/Authorized Official Date

_____

Title