

# **CITY OF MOORE, OKLAHOMA**

## **COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR) ACTION PLAN SUBSTANTIAL AMENDMENT**

**Proposed Uses of the Allocation of CDBG-DR Funds Under the Disaster Relief  
Appropriations Act, 2013 (Public Law 113-2) through the  
U.S. Department of Housing and Urban Development (HUD)**

**For public comment June 30th to July 17<sup>th</sup>, 2017**

**City of Moore, Capital Planning and Resiliency**

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## **EXECUTIVE SUMMARY**

### **(A) Overview**

The Third Substantial Amendment modifies the City of Moore's Community Development Block Grant – Disaster Recovery Action Plan of 2014 as follows:

#### Housing

The Third Substantial Amendment (SA) updates the housing needs assessment based on current data and adjusts the budgets by ending the housing rehabilitation program and establishing the down payment assistance, closing costs assistance, and equity buy down (DPA) program.

The SA revises housing program descriptions to better define program eligibility, objectives, and priorities and establishes the criteria for the DPA program.

The SA establishes criteria for multifamily new construction consisting of Broadband Infrastructure, the Green Standard definition, Crime Prevention Through Environmental Design and ICC 500-2014 Standard and Commentary ICC/NSSA Standard for the Design and Construction of Storm Shelters – Community or Residential Shelters.

#### Infrastructure

- The SA updates the infrastructure needs assessment based on current data and adjusts the budgets by allocating funding from the administrative and resiliency budget to the infrastructure budget

#### Public Facilities

- The SA updates the public facilities needs assessment based on current data.

#### Economic Development

- The SA updates the economic development needs assessment based on current data.

#### Resiliency

- The SA reallocates funding to planning and to infrastructure, thereby closing Resiliency

#### Planning

- The SA provides update of planning activities completed and in progress; and
- Reallocates funding to Planning from Resiliency and reallocates funding from planning budgets to infrastructure projects

#### Administration

- The SA provides update of administrative activities completed and in progress;

- Reports on upgrades to accounting systems
- Adjusts the budget based on new internal plan; and
- Reallocates funding from administrative budgets to infrastructure projects

**(B) Administering Agency**

The government of the City of Moore is divided into executive and legislative branches. The Mayor of Moore is elected by general election for a term of four years. The City Manager manages the day to day operations of the City. The City Manager hires staff who oversees the various departments. City Council is the legislative branch and is made up of seven (7) City Council members, two from elected from each Ward and the Mayor

Department of Capital Planning and Resiliency (CP&R) is charged with the responsibility of overseeing the administration of CDBG; CDBG-DR; federal; and state transportation funds. CP&R answers directly to an Assistant City Manager. CP&R manages contractors for various infrastructure housing and public facilities projects undertaken by the City.

CP&R manages state and federal funds designated for community development activities in the City including CDBG, CDBG-DR, and Federal transportation and State funds for equipment improvement.

**(C) Proposed Activities**

***INFRASTRUCTURE PROJECTS***

The City will continue to address and complete projects identified in the Infrastructure Recovery and Implementation Plan (IRIP).

***HOUSING PROJECTS***

The City will continue work on the LMI housing proposed at the Royal Park Redevelopment site, and will initiate a down payment and closing cost (DPA) program targeting LMI households purchasing housing that meets the City’s wind resistance code and has a safe room or shelter that meets the FEMA P-320 or P321 standard.

***PUBLIC FACILITIES PROJECTS***

The City will complete work on the repairs and renovations to Little River Park

***PROPOSED ACTIVITY SUMMARY***

<b>Table 1: Proposed Activity Summary</b>		
<b>Activity</b>	<b>Current Allocation</b>	<b>Proposed Allocation</b>
Housing	\$16,000,000.00	\$16,000,000.00

Infrastructure	\$18,000,000.00	\$26,941,317.74
Public Facilities	\$2,000,000.00	\$2,000,000.00
Economic Revitalization	\$0.00	\$0.00
Resiliency	\$5,760,000.00	\$0.00
Administration	\$2,610,000.00	\$2,610,000.00
Planning	\$7,830,000.00	\$4,648,682.26
Total	\$52,200,000.00	\$52,200,000.00

## SECTION I: PLAN NARRATIVE

### (A) Needs Assessment

#### 1. Housing

##### Initial Needs Assessment

The 2013 tornado disaster significantly impacted the City’s housing sector. The majority of the property in Moore that was affected by the May 20, 2013 tornado was residential property that contained a variety of single and multi-family as well as owner and renter-occupied dwellings. 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 two apartment complexes, one mobile home complex, and single family residences, showed that a total of 2,491 units received some level of damage from this disaster. Approximately 1,091 dwellings were destroyed with an additional 1,400 damaged.

Using the methodology outlined by FEMA, over 2,400 owners’ primary residences and renter-occupied homes were affected by this disaster experiencing minor, major or destroyed homes.

A rapid response team of structural engineers surveyed the tornado area beginning on May 21, 2013. Their findings confirmed that of the 814 homes that were affected or received minor damage from the tornado, much of the damage was caused by blowing debris. Pieces of buildings, outbuildings, and trees became projectiles as the high wind speed blew them into homes. Often times, something as small as a 2X4 structural timber from a residential structure would pierce a brick home through the exterior wall. Many windows were blown out by flying debris. In more serious instances, commercial shipping containers, vehicles of all weight and sizes, and even large gas and oil tank batteries were carried by the tornado’s winds for over a quarter mile, contributing to the major damage or destruction of 1,276 homes.

After insurance and FEMA payments, the City estimates over \$22.8 million in unmet housing needs.

### **Updated Housing Needs Assessment**

The City, in conjunction with other funding sources, focused on the immediate needs of its LMI residents with housing rehabilitation and infrastructure projects. The City identified housing as the largest unmet need for the low-moderate income population. Funding from the first allocation was used to fund low-moderate income (LMI) and non-LMI households for unmet housing rehabilitation needs from the tornado; to acquire land for replacement of LMI rental housing destroyed by the tornado and to provide for a down payment and closing cost program to encourage the redevelopment of single family housing on lots left vacant after the demolition of homes in the aftermath of the tornado. In total, the City allocated \$16 million for housing activities in tornado impacted areas.

### ***Housing Rehabilitation Program***

Moore instituted an owner occupied housing rehabilitation program in July 2015 targeted at households directly impacted by the qualifying event. The owner occupied rehabilitation program did not generate the demand expected. The success of private fundraising efforts through church groups, donations and fundraising efforts, coupled with a high level of volunteer involvement from communities around the country led to most housing rehabilitation needs being addressed by the Local Area Relief Council (LARC). LARC coordinated resources for the area, accepting and acting applications for rehabilitation assistance City wide utilizing private donations and volunteer labor. Due to lack of demand, the City closed the owner occupied housing rehabilitation program in October 2016. As of this submission, \$59,639 has been expended. The program is in the closeout process.

### ***Multifamily Replacement Housing Program***

The decision by the owner of the partially destroyed Royal Park Mobile Home Park to close the mobile home park provided Moore with an opportunity to replace a portion of the 357 units of LMI affordable rental housing destroyed by the tornado. In the spring of 2015 the City moved to acquire 14.4 acres of the former Royal Park site for redevelopment as a mixed use, mixed income urban village. The City acquired the land for redevelopment on October 30<sup>th</sup>, 2015 utilizing \$3,246,031 in CDBG-DR funds.

In 2016 the City completed demolition of the remaining structures and completed asbestos abatement.

The Royal Park Master Plan was completed in July 2016 and City Council adopted the plan on 1 August 2016.

A design statement for a planned unit development on the site was approved by the Moore Planning



Commission on September 21<sup>st</sup>, 2016 as Planned Unit Development #946E.

The master planning process established design guidelines and an overall plan for the site. Current estimates are 170 affordable units and 30 market rate units will be built at an overall cost of \$36 - \$40 million, including a \$13.5 million CDBG-DR subsidy. The City is currently developing the Request for Proposals for the developer of the Royal Park Redevelopment. As of this submission, \$3,804,031 has been expended on the project<sup>1</sup>.

***Down Payment and Closing Cost Assistance Program***

Post event over 600 homes were demolished as unsafe or abandoned properties which posed a threat to health and safety. Thus far, rebuilding on these now vacant lots has been spotty, with 148 vacant lots remaining. Strategically, the City recognizes that encouraging the development of single family homes on these vacant sites is critical to the revitalization of the City’s tornado affected areas. For this reason, the City has prepared for the implementation of a down payment and closing cost assistance program (DPA program) targeted at up to 95 LMI households to encourage the redevelopment of vacant lots in the affected area. In October 2016 City Council adopted the policies and procedures for the DPA program and in April 2017 the City procured a sub-recipient to operate the program. The City has allocated \$1 million to the program. No funds have been obligated or expended.

The DPA program has the following eligibility criteria:

<b>Eligible Properties</b>	<b>Type</b>	<ul style="list-style-type: none"> <li>• Eligible properties are detached single-family residences used as the primary residence of the borrower.</li> <li>• Eligible properties must be unoccupied for 90 days before the home buyer signs a sales contract for the property.</li> </ul>
	<b>Price</b>	<ul style="list-style-type: none"> <li>• The price of the property cannot exceed \$138,000 for an existing residence, and \$180,000 for a newly constructed residence.</li> </ul>
	<b>Condition</b>	<ul style="list-style-type: none"> <li>• An appraisal of the property is required.</li> <li>• The property must meet all applicable City zoning and building code requirements, and have a shelter or safe room that meets or exceeds the FEMA standard established at FEMA P-320 and P-321, as determined by City Inspector.</li> <li>• All units must meet or exceed Ordinance: 768(14) 3/17/14 Dwelling code 5-204 C</li> </ul>
	<b>Location</b>	<ul style="list-style-type: none"> <li>• The property must be located within the tornado impacted area. See boundary descriptions and maps in Appendix C: Property Requirements.</li> </ul>

<sup>1</sup> June 19<sup>th</sup>, 2017

<p><b>Eligible Applicants</b></p>	<ul style="list-style-type: none"> <li>• Households whose income is between 50% and 80% of the area median.</li> <li>• Total housing expenses cannot exceed 32% of the income or be less than 25% of income;</li> <li>• Debt-to-income ratio cannot exceed 42% of income. For more detail, please refer to the calculation worksheet in Appendix B: Buyer Eligibility Worksheet.</li> <li>• Buyer’s contribution is expected to be 1% of the price of home. Buyer’s contribution may only be utilized for equity.</li> <li>• Buyers must have three months of mortgage payments in the bank at closing.</li> </ul>
<p><b>Gifts</b></p>	<ul style="list-style-type: none"> <li>• Grants or Contributions from third parties not associated with the seller, realtor, contractor, developer, or City are permitted including: <ul style="list-style-type: none"> <li>• Family donations</li> <li>• Foundations</li> <li>• Religious or ecumenical groups</li> <li>• State or federal government</li> </ul> </li> <li>• Eligible contributions are subject to first mortgage lender’s requirements.</li> <li>• All eligible contributions require a Gift Affidavit from the giver</li> </ul>
<p><b>CDBG-DR Requirements</b></p>	<ul style="list-style-type: none"> <li>• Loan origination fees cannot exceed 3% of total cost of home.</li> <li>• Estimated closing costs are anticipated to be 4% of the price of home.</li> <li>• Total assistance package, including the equity contribution, cannot exceed \$40,000.</li> <li>• All household members must provide proof of US citizenship or Resident Alien status.</li> <li>• All applicants must undergo a Duplication of Benefits review.</li> </ul>
<p><b>Ineligible Types of Financing</b></p>	<ul style="list-style-type: none"> <li>• Balloon Financing</li> <li>• Variable Rate Financing</li> <li>• Co-signers who are not or will not be primary residents of the home</li> <li>• Piggyback loans</li> <li>• Any loan type where the buyer(s) receive a payout at closing</li> <li>• Financing which requires additional subordination below the City’s second lien position</li> </ul>
<p><b>Deadlines and other requirements</b></p>	<ul style="list-style-type: none"> <li>• The application period opens upon the City of Moore’s announcement, and continues until program funds are expended.</li> <li>• The prospective homebuyer must submit an application.</li> </ul>

## 2. Infrastructure

### Initial Needs Assessment

The tornado had an extensive impact on the City’s infrastructure. As the tornado moved across the City it hit 23 neighborhoods creating significant direct and indirect damage. Local roadways experienced significant damage due to the disaster. Trees and debris made roads impassable. As the city moved forward with debris removal the City’s roadways suffered more significant damage.

In addition to the transportation damage, the City had to contend with extensive damage to other public infrastructure. Public water supply and wastewater systems suffered damage and loss of revenue from the reduction in the number of homes and businesses purchasing services. City parks were significantly damaged and are requiring major investments to recover.

While the final cost of recovery is not yet known, the magnitude of the storms impact is expected to stretch the City's general fund account. Funding from FEMA's Public Assistance program will help cover some of the costs, but the City will face the ongoing challenge of paying for the damages for years to come.

The City's initial estimate of unmet infrastructure need was in excess of \$50 million.

### **Updated Needs Assessment**

In accordance with Federal Register Notice (FRN) [FR-5696-N-01](#): *Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013*; (March 5, 2013). The City procured Cardinal Engineering to complete an Infrastructure Recovery and Implementation Plan (IRIP). The IRIP was designed to meet the FRN requirement that: *grantees must conduct an assessment of community impacts and unmet needs to guide the development and prioritization of planned recovery activities*. The IRIP was completed in February 2015 and was adopted by the City Council on March 12, 2015.

The IRIP served to further refine infrastructure-related data presented in the City of Moore Disaster Recovery Action Plan (Action Plan) submitted to the United States Department of Housing and Urban Development on March 22, 2014. This Action Plan was submitted by the City of Moore as a condition of its receipt of \$26.3-million in federal funding under the Community Development Block Grant – Disaster Recovery (CDBG-DR) Program (Allocation No. 1).

Based on the limited information available to the City of Moore at submission of the Action Plan, total public infrastructure damages related to the May 20, 2013 Tornado were estimated at \$110.3 million.

The primary objectives of the IRIP were to (1) *further refine the originally provided infrastructure damage estimates*, (2) *identify public infrastructure improvements which will improve the future*

*resiliency of the City of Moore as well as the quality of life for its citizens, (3) combine the identified public infrastructure improvements (or sub-projects) into logical, coordinated projects, and (4) develop a funding strategy and implementation schedule for these projects.*<sup>2</sup>

The IRIP utilized an Infrastructure Rating Index (IRI) to assess the projects across seven assessment zones impacted by the tornado. The IRIP identified \$162-million in infrastructure improvements representing 158 sub-projects consolidated into 47 projects within the tornado impacted area.

The IRIP Assessment Team recommended that:

*“...the City focus recovery activities within the Plaza Towers, King’s Manor, and J.D. Estates Assessment Zones. Based on all field review and subsequent documentation and analysis, it appears that these areas were among the most impacted from the May 20, 2013 Tornado. Completing improvements to public infrastructure in these Assessment Zones will help to insure that recovery across the central portion of the Study Area occurs as quickly as possible. Further, the Assessment Team anticipates that improvements in these key areas will also serve to encourage current residents and citizens, as well as potential property owners that recovery within the City of Moore is occurring in a deliberate and tangible way.”*<sup>3</sup>

At the time of the IRIP the King’s Manor projects were within an LMA census block group.

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<sup>2</sup> Infrastructure Recovery and Implementation Plan (IRIP); page 8; March 15, 2015

<sup>3</sup> Infrastructure Recovery and Implementation Plan (IRIP); page 64; March 15, 2015

### **3. Public Facilities**

#### **Initial Needs Assessment**

The tornado's impact on public facilities included damages to the publically owned utility, damages to parks and recreational areas, and damages to public buildings, including schools.

The schools were fully insured and were being rebuilt. Plaza Towers Elementary was under construction with the 300 students relocated to the Central Junior High School, known locally as Plaza 800. Briarwood Elementary was to be rebuilt in 2014, with the 567 students relocated to the Emmaus Baptist Church campus.

The other public buildings affected were insured and there is no unmet need. Many of the publically owned utility costs were insured, with an unmet need of \$18.7 million. The remaining unmet need was in parks and recreational facilities at \$17.2 million. In total, the City estimated an unmet need for public facilities of \$35.9 million.

#### **Updated Needs Assessment**

The two public schools were rebuilt and are currently operating. The reconstruction included establishing storm shelters to the specification required by the ICC 500-2014 Standard

#### **Public Utilities**

The City utilized rate increases to affect repairs to public utilities except for the replacement of water and sewer lines in tornado impacted areas where roads were reconstructed. These projects are identified in the IRIP

#### **Parks & Recreation**

The Little River Park, the public facility located in census tract 2016.04, took a direct hit from the tornado.

The City has allocated \$2,005,000 for playground equipment of which \$482,986<sup>4</sup> has been expended.

The City received a contribution from Devon Energy of \$300,000 to add pavilions to the Little River park renovations and Oklahoma City Community Foundation (Cardinal Care Grant) of \$140,000 to install restrooms

The City received \$100,000 from the Coca Cola Foundation for the rehabilitation of Veteran's Park which was completed without CDBG-DR assistance in 2015.

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<sup>4</sup> As of June 19<sup>th</sup>, 2017

#### ***4. Economic Development***

##### **Initial Needs Assessment**

The 2013 tornado devastated many businesses within the City, causing substantial commercial property damage and short-term and long-term business operations losses. Over 200 businesses in the City were affected by the tornado, either through direct damage or indirect damage caused by power outages and wind damage. Ninety (90) businesses received direct damages.

Separately, damages to public infrastructure such as roads, bridges as well as compromised water and electrical utility systems have caused significant interruption on the City's economy and have had a corresponding negative impact on businesses trying to recover after the storm. Gas unavailability also created issues for businesses trying to return to routine operations.

In the months following the tornado, many businesses grappled with the cost of repairing damaged buildings that resulted from temporary closures and unavailability of their respective customer bases. The tornado also impacted business related revenues for the City. Per the December 31, 2013 financial statement (exactly half of the fiscal year), revenues were at 42% of the budgeted amount with 50% of the fiscal year expired. When compared to year-to-date expenses the City faced a \$1.1 million shortfall that reduced fund reserves.

After insurance, Small Business Administration loans and FEMA payments, the City estimated, based on communications with the affected business, an unmet need of \$1.95 million.

##### **Updated Needs Assessment**

Commercial and business sectors in Moore have largely recovered from the tornado impacts. The City's sales tax base had stabilized by the end of the City's 2015 fiscal year and is now experiencing modest growth. The damages to the commercial area around the regional hospital and the Warren Theater have been rebuilt or replaced. The commercial corridor along SW 19<sup>th</sup> St has expanded into residential areas directly impacted by the tornado, resulting in the loss of LMI housing units, and an increase in commercial activity. No additional SBA loans related to the disaster were issued after 2013 within the City.

#### ***5. Resiliency***

The City had allocated \$3.7 million to create a debris wall along the interstate corridor designed to deflect tornado debris. A Preliminary Feasibility Study of a Site Specific Debris Wall was completed

in November 2015. The City determined, with assistance from HUD, that the proposed hazard mitigation wall would not be eligible for CDBG-DR funding. The City could not find another resource to complete the hazard mitigation wall and the project was canceled in December 2015. The associated costs of the feasibility study were transferred to planning and the balance of the allocation was reallocated to infrastructure projects.

**(B) Allocation of Funds**

The following is a summary of our proposed final Grant Agreement 5.

<b>Program Category</b>	<b>Amount Previously Obligated</b>	<b>Proposed Final Obligation #5</b>	<b>Proposed Total Obligation</b>
Housing	\$3,830,820.55	\$12,169,179.45	\$16,000,000.00
Infrastructure	\$15,913,464.18	\$11,027,853.56	\$26,941,317.74
Public Facilities	\$1,275,000.00	\$725,000.00	\$2,000,000.00
Economic Revitalization	\$0.00	\$0.00	\$0.00
Resiliency	\$83,351.57	-\$83,351.57	\$0.00
Administration	\$1,202,849.44	\$1,407,153.56	\$2,610,000.00
Planning	\$2,719,788.23	\$1,928,894.03	\$4,648,682.26
<b>Total</b>	<b>\$25,025,274.97</b>	<b>\$27,258,080.60</b>	<b>\$52,200,000.00</b>

***Infrastructure Projects***

In February 2014 the City allocated a total of \$3 million for various infrastructure projects identified in the Infrastructure Recovery and Implementation Plan (IRIP). Upon award of the second grant the City adopted an allocation for the second grant award which included an additional \$15 million for infrastructure and \$3.7 million for resiliency. Current infrastructure status is summarized in the following table:

<b>National Objective</b>	<b>Budget</b>	<b>Expended</b>	<b>2017 Allocation</b>	<b>Status</b>	<b>Number of Projects</b>
LMA	\$ 3,600,000	\$ 3,560,798	\$ 3,560,798	Complete	2
LMA	\$ 3,600,000	\$ 95,273	\$ 3,200,000	In Progress	2
URG	\$ 2,500,000	\$ 2,337,745	\$ 2,337,745	Complete	4
URG	\$15,000,000	\$ 9,933,609	\$15,000,000	In Progress	5

<sup>5</sup> As of June 19, 2017

TOTAL	\$24,700,000	\$ 11,334,051	\$24,098,543		13
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***Housing Programs and Projects***

The City has completed a housing rehabilitation program, initiated a rental housing replacement project and is in the process of initiating a down payment, closing cost and equity buy down program. The balances of CDBG-DR funds originally targeted to a housing rehabilitation program have been re-targeted to other activities.

<b>Table 4: Housing Programs<sup>6</sup></b>				
<b>Program</b>	<b>2014 Allocation</b>	<b>Expended</b>	<b>2017 Allocation</b>	<b>Status</b>
Housing Rehabilitation	\$2,500,000	\$ 59,639	\$ 59,639	Complete
Rental Development	\$13,500,000	\$ 3,804,031	\$13,500,000	In Progress
DPA	\$0	\$0	\$1,000,000	New
TOTAL	\$16,000,000	\$3,863,670	\$14,559,639	

***Public Facilities Projects***

The current allocation for public facilities will not change from the previous allocation.

<b>Table 5: Public Facilities Projects</b>			
<b>Program</b>	<b>Allocation</b>	<b>Expended</b>	<b>Status</b>
LMA Public Facilities	\$0	\$0	Complete
LMA Public Facilities	\$500,000	\$ 482,987	In Progress
TOTAL	\$500,000	\$ 482,987	

***Economic Development Projects***

The City did not allocate funds for economic development from either award due to the limited unmet need. No new needs have been identified.

**(C) Planning and Coordination**

The City established four main goals for Planning funding in the 2014 Disaster Action Plan:

- The City will use a portion of Planning Funding to develop a Capital Improvements Plan for the tornado impacted area (\$125,000). The objective of the Capital Improvements Plan is to provide the City with the ability to plan for the long-term recovery of the City; (infrastructure; drainage; storm water; storm sewer; water & sewer);

<sup>6</sup> As of June 19, 2017



- The City will use a portion of Planning Funding to develop master plan for the development of a parcel as a multifamily property (\$125,000);
- The City will use a portion of Planning Funding to acquire software and to provide training to staff that will assist the City in meeting Federal Requirements (\$50,000);
- The City will use a portion of Planning Funding to conduct a Feasibility Study for the construction of “debris barrier walls” that are intended to protect selected neighborhoods from projectile debris, thereby reducing the number of homes being affected or damaged from projectile debris in future storm events (\$75,000); and
- The City will be reimbursed approximately \$25,000 in costs related to the development of the Action Plan.

The City has accomplished the following:

- A Preliminary Feasibility Study of a Site Specific Debris Wall: The preliminary study was completed in November 2015. The City determined, with assistance from HUD, that the proposed hazard mitigation wall would not be eligible for CDBG-DR funding. The City could not find another resource to complete the hazard mitigation wall and the project was canceled in December 2015.
- Gateway Designs: The City procured a design team to establish gateway designs for six neighborhoods impacted by the tornado. The gateway designs are helping to re-brand and revitalize the affected neighborhoods. The designs were completed in May 2016 and have been implemented as part of infrastructure projects in four affected communities.
- Comprehensive Storm Water Management and Drainage Plan: The City of Moore procured an engineering firm to prepare the [Comprehensive Storm Water Management and Drainage Plan](#) with the goal of developing a comprehensive, integrated storm water plan for the City, The plan evaluated existing and potential drainage and flooding problems within the City and recommend capital improvement projects and/or programmatic measures to correct or avoid such problems. Also included is the Compliance and Monitoring Plan for the Lake Thunderbird Total Maximum Daily Load (TMDL) and a 5 year Storm Water Quality Management Plan. The plan was completed in January 2017.
- The [S.W. 17<sup>th</sup> Street/S. Janeway Master Plan](#) (“the Master Plan”) was completed in July 2016 and City Council adopted the plan on 1 August 2016. The process included design charrettes, public meetings and numerous levels of citizen participation The Master Plan addresses the

replacement of rental units lost in the tornado with at least 200 rental units of which 80% will be affordable to households at or below 80% of AMI. The planning process included significant and ongoing citizen participation in the conceptualization and redevelopment of the property. The Master Plan was completed in September 2016. The resulting redevelopment strategy is currently in procurement for a qualified developer.

- **A Comprehensive Plan:** A Comprehensive Plan is a statement of a community's vision of itself now and in the future, which directs the physical growth, development and redevelopment of a community. The plan serves as a tool, combining the many functional parts of a city into a unified document that helps the community to achieve its long-term goals and objectives. The City of Moore needed an updated comprehensive due to the myriad of changes within the community since the last plan was adopted in 2006. The City underwent tremendous development along the I-35 Corridor and SW 19<sup>th</sup> Street, and made major public investments in fire stations and a new Emergency Operations Center. After redevelopment and rebuilding from multiple tornados, the City needed to reevaluate its vision, goals and priorities for the future. The adopted comprehensive plan, Envision Moore 2040, includes goals and policy recommendations that address the most common problems within a rapidly growing community, including traffic congestion, the need for sidewalks and trails, the location and quality of new housing developments, and improving the appearance of blighted areas.
- **Foxglove Trail Plan;** The Foxglove Trail Plan is a preliminary engineering plan for a small neighborhood walking park in a tornado impacted area. The plan is expected to be complete by July 2017.
- **GIS System Upgrade:** The GIS upgrade was undertaken to increase the City's capacity to respond to changes in the City, its infrastructure, demographics and emergency services. The upgrade is expected to be complete in December 2017.
- **Railroad Underpass:** A health and safety problem identified in the IRIP was the level grade crossing of SE 4<sup>th</sup> St and the BNSF main line from Dallas to Oklahoma City. SW & SE 4<sup>th</sup> St constitute the main east west arterial on the north side of the City, providing direct access to the Norman Regional Hospital that serves Moore. The crossing makes the movement of emergency vehicles through the City difficult during normal times, and extremely difficult during a disaster. Railroad underpass planning is focused on establishing the groundwork for the replacement of the level grade with an underpass. The planning process involves the City,

the State of Oklahoma DOT, and BNSF Railroad. The planning process is underway with an expected completion of September 2018.

**(D) Leveraging Funds**

The City has leveraged the CDBG-DR funds through a combination of paying for staff time from City funds, and where applicable, utilizing other public or private sources to leverage CDBG-DR funds. The total amount of leverage thus far is \$174,740.92.

**(E) Protection of People and Property**

In accordance with the requirements of FR-5696-N-01 the City has taken numerous steps to increase the protection of people and property from harm. Highlights include: A safe room/shelter program funded with private donations which subsidized 1,614 safe rooms or shelters; a revised building code for new construction, considered the toughest tornado building code in the country at its adoption by the City; A requirement that multifamily new construction completed with CDBG-DR funds meet green building standards and meet the specifications of the ICC 500-2014 Standard and Commentary ICC/NSSA Standard for the Design and Construction of Storm Shelters – Community or Residential Shelters (ICC 500-2014 standard). the Moore school system is utilizing the ICC 500-2014 standard and for all school based shelters; and the City is requiring purchases made with the new low-moderate income DPA program include a storm shelter or safe room that meets FEMA P-320 and P-321 requirements.

**(F) Impact on Public Housing, HUD-Assisted Housing, and Housing for the Homeless**

There are no Public Housing Authorities within Moore's City limits. There are 571 HUD subsidized units, none of which have an unmet need attributable to the disaster. There are no transitional, supportive housing or other Continuum of Care or McKinney-Vento sponsored housing within the City of Moore.

The City is part of the Continuum of Care of Cleveland County ("CoC Cleveland Co."). Members of the CoC Cleveland Co. reported no spike in demand on any available CoC Cleveland Co. services. Only one tenant displacement occurred which involved a member of the CoC Cleveland Co.

The CoC Cleveland Co. reported a slight decline in operational support by traditional non-federal sources as funds were diverted to the tornado's impact.

Through the various data and information collection efforts carried out by the City, as previously detailed, there have not been any HUD-assisted housing properties identified as having unmet needs. As a result, the City has not reserved any funding to specifically to address the rehabilitation, reconstruction or replacement of any McKinney-Vento funded shelters and housing for the homeless.

Should information relative to unmet need associated with alleviating the pressures of homelessness associated with the devastation caused by the tornado become apparent, the City is committed to allocating any necessary resources from the allocation consistent with all federal requirements and obligations.

### **(G) Construction and Rehabilitation Standards**

#### ***Single Family Residential***

**New Construction:** The Moore City Code was updated in 2014 to include wind resistance features in design and construction. The City's building code is based on IBC 2009, with amendments. All single family new construction must meet City Code.

**Existing Housing for Purchase:** The City's Down Payment and Closing Cost Assistance Program ("DPA") requires properties purchased be built after the implementation date (June 2, 2014) of wind resiliency requirements, have a safe room or shelter which meets the FEMA P320 requirements, and meet all applicable City codes.

**Rehabilitation:** The City of Moore requires all homes receiving CDBG-DR funding be brought up to the applicable City code.

#### ***Multifamily Residential***

**New Construction:** The City's new construction building code is based on IBC 2009, with amendments.

Multifamily residential funded with CDBG-DR funds include the following requirements: the ICC 500-2014 Standard and Commentary ICC/NSSA Standard for the Design and Construction of Storm Shelters – Community or Residential Shelters; The availability of broadband infrastructure to provide Wi-Fi to tenants in accordance with Federal Register Notice [FR 5890-F-02](#); Meet an industry-recognized standard that has achieved certification under at least one of the following programs: (i) ENERGY STAR (Certified Homes or Multifamily High Rise); (ii) Enterprise Green Communities; (iii) LEED (NC, Homes, Midrise, Existing Buildings O&M, or Neighborhood Development); (iv) ICC-700 National Green Building Standard; (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite); or (vi) any other equivalent comprehensive green building

program in accordance with the requirements of [FR-5696-N-01](#); and, Include Crime Prevention Through Environmental Design (CPTED) in the design and operation of the property<sup>7</sup>.

**Rehabilitation**

The City is not engaged in the rehabilitation of multifamily properties.

**(H) Displacement**

If any of the funded projects require displacement or relocation of residents, relocations will be funded in accordance with the regulations and limitations set out under the Uniform Relocation Act (URA)

**(I) Management of Program Income**

The activities proposed in this Substantial Amendment are not expected to result in program income.

The City will provide grants within all components of CDBG-DR. Liens will be filed on each property to ensure compliance requirements, with recapture of all or a portion of the grant in the event of any noncompliance during the compliance period. The City does not intend to fund revenue generating activities as part of its administration of the funding.

In the event that any program income is nevertheless generated in connection with the City’s administration of the CDBG-DR funding, the City will comply with HUD requirements found in 24 CFR 570.489 regarding program income.

**(J) Monitoring Standards and Procedures**

**1. Project Oversight**

The Department of Capital Planning and Resiliency (CP&R) is charged with the responsibility of overseeing the administration of CDBG; CDBG-DR; federal; and state transportation funds. CP&R answers directly to an Assistant City Manager. CP&R manages contractors for various infrastructure, housing and public facilities projects undertaken by the City. CP&R utilizes the City’s CDBG/CDBG-DR Manual to manage programmatic activities.

**2. City’s Fiscal and Programmatic Monitoring**

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<sup>7</sup> CPTED is a long term commitment to maintaining the property in a manner which reduces the possibility of crime. The City police department will provide an annual inspection of CPTED properties.

CP&R has two Compliance Specialists who develop risk assessments and undertake monitoring based on the risk assessed. Each program area has a specific monitoring procedure in the City's CDBG/CDBG-DR Manual. The City has contracted with an Internal Auditor to assist in maintaining fiscal and compliance activity in accordance with the applicable federal requirements.

Fiscal monitoring is completed by staff of CP&R and reviewed by the Internal Auditor.

CP&R has contracted with CDBG-DR consultant to assist the City in program development and implementation

### ***3. City's Audit Procedures***

The electronic records kept by the City of Moore are audited each year at the end of the fiscal year by the external Auditor. Random records are selected from each area receiving or distributing cash, then followed through the system to check for accuracy and potential for abuse and fraud.

All funds within the City's accounting records are included in the audit report. A Single Audit is performed to comply with federal requirements.

The Department of Capital Planning and Resiliency maintains an Internal Auditor to periodically review the City's use of Community Development Block Grant Disaster Recovery (CDBG-DR) funds.

#### **Accounting Upgrades**

The City contracted for an upgrade of the City's overall accounting system in 2014. The conversion included the capability to maintain project based accounts and to meet all other federal requirements. The software conversion has the capability to meet and federal requirements and is operational.

The City contracted with a consultant utilizing City funds for an upgrade of the City's Account policies and procedures and an Accounting manual. Council adopted the updated Accounting Manual on October 3<sup>rd</sup>, 2016

### ***4. Other City Monitoring Practices***

#### **Minority Business Enterprise and Women Business Enterprise (MBE/WBE):**

The City provides a preference for MBE/WBE in contracting. To insure MBE/WBE are utilized to the degree stated in a successful proposal, the City requires reporting at each draw of the amount paid to WBE/MBE's. The Monitoring Plan for a contractor includes desk monitoring of MBE/WBE compliance

### **Section 3**

The City provides a preference for Section 3 Businesses in contracting. To insure Section 3 Businesses are utilized to the degree stated in a successful proposal, the City requires reporting at each draw of the amount paid to Section 3 Businesses. The monitoring plan for a contractor includes desk monitoring of Section 3 Business compliance and may require on-site monitoring. Section 3 hiring requirements are included in all contracts, with payment contingent on submission of Section 3 New Hire Reports, Business Reports and ongoing evidence of outreach to entities who can generate Section 3 hires and/or Section 3 business. The monitoring plan for a contractor includes desk monitoring of Section 3 new hire and outreach compliance and may require on-site monitoring.

#### ***5. Procedures to Detect and Prevent Waste, Fraud, Abuse, and Mismanagement***

The City's CDBG Policies and Procedures manual specifies steps to be taken in each program or project activity to detect and prevent waste, fraud, abuse, and mismanagement. General requirements include:

Each CDBG-DR funded activity receives a risk assessment and monitoring plan. The risk assessment determines the level and timing of monitoring. Monitoring teams of staff and technical experts are utilized for on-site monitoring. Monitoring reports are completed for each on-site monitoring. Any deficiencies identified in monitoring reports are corrected in accordance with the guidance provided by the monitoring team. Evidence of fraud is referred to appropriate authorities.

Both CDBG-DR funded projects and programs undergo a duplication of benefits review. Duplication of benefits review is performed by for all households participating in the City's down payment assistance program. Evidence of fraud is referred to appropriate authorities.

The Department of Capital Planning and Resiliency (CP&R) has an Internal Auditor who reviews policies, procedures and activities. Deficiencies identified by the Internal Auditor are addressed by CP&R management.

The City is undergoes an annual independent audit that meets the requirements of the State of Oklahoma and the applicable federal Government Accounting Standards. A Single Audit for the CDBG-DR program is performed to comply with federal requirements.

**6. *Prevention of Duplication of Benefits***

Duplication of benefits calculations are completed by the staff of CP&R utilizing policies and procedures specific to the program or project activity. Policies and procedures require a Compliance Specialist to verify duplication of benefits calculations. The verification of benefits procedure insures accuracy and provides a check of the duplication of benefits calculations. In addition, the internal auditor reviews duplication of benefit policies and procedures to insure overall compliance with the Stafford Act.

**(K) Capacity**

The Department of Capital Planning and Resiliency (CP&R) manages the day to day operations of the CDBG and CDBG-DR programs. CP&R is directly responsible to an Assistant City Manager. The Assistant City Manager also manages the Community Development Department which undertakes planning activities utilizing CDBG-DR funds

CP&R has five full time employees and utilizes additional employees in the City for planning, inspections and financial management.

The CDBG Manager manages the CDBG and the CDBG-Disaster Recovery (DR) program and oversees all Public Service and non-construction portions of CDBG and CDBG-DR programs. The CDBG Manager also verifies beneficiaries and subrecipients are meeting all HUD regulations and guidelines and requests Integrated Disbursement and Information System (IDIS) and Disaster Recovery Grant Reporting System (DRGR) draws.

The CDBG Administrative Assistant reports to the CDBG Manager and assists the CDBG Manager with various administrative, program and project tasks.

Two Compliance Specialists complete risk assessments and monitor all CDBG and CDBG-DR subrecipients and contractors to verify federal funding is being used correctly. Compliance Specialists also monitor contractor activities for Section 3, Davis-Bacon, Minority-Owned Business, and Women-Owned Business compliance, and complete all environmental reviews. The Accountant II reports to the CDBG Manager and is responsible for assembling all duplication of benefits certifications, approving IDIS and DRGR draws; reviewing all check



requests for accuracy against the subrecipient or contractor agreement, and producing and tracking all monthly draw and expenditure reports

In addition to CP&R staff, consultants are utilized for engineering, architectural, planning, CDBG compliance and internal audits. A subrecipient is utilized for implementation of the down payment assistance program and contractors are utilized for various construction activities

## **SECTION II: LOCATION, MITIGATION MEASURES, AND USE OF URGENT NEED**

### **(A) Presidentially-declared County**

The City of Moore is located in Cleveland County, Oklahoma, a Presidentially-declared county in DR-4117 for the period May 18<sup>th</sup> through June 2<sup>nd</sup>, 2013.

### **(B) Mitigation Measures**

#### **Green Infrastructure**

The Infrastructure Recovery and Implementation Plan (“IRIP”) provided the framework for the City’s commitment to green infrastructure. IRIP encouraged the use of green infrastructure to mitigate against storm water run-off and flooding when repairing or replacing damaged infrastructure. The City has built these mitigation concepts into infrastructure projects when financially feasible.

#### **Green Building - Residential**

In terms of complying with the Green Building Standard established in the Federal Register Notice, the City will require that replacement of residential properties, including reconstruction and new construction of substantially damaged properties meet and be certified under one of the following criteria: ENERGY STAR (Certified Homes or Multifamily High Rise); Enterprise Green Communities; LEED (NC, Homes, Midrise, Existing Buildings O&M, or Neighborhood Development); or ICC–700 National Green Building Standard;

For those buildings that are not substantially damaged, the City will require that they be rehabilitated following the HUD CPD Green Buildings Retrofit Checklist. The requirement for rehabilitation means that the developer and/or construction team will strive to meet the checklist standard to the extent that there are Energy Star, Water Sense and Federal Energy Management Program-designated products available. The City recognizes that most energy- and water-

consuming appliances and products now are available with these designations, and therefore, acknowledges that in a rehabilitation situation most products will be available with conservation designations.

### **Resilience Performance Standards**

- For new construction multifamily properties the provision of either safe rooms or shelters which meet or exceed the ICC 500-2014 Standard and Commentary ICC/NSSA Standard for the Design and Construction of Storm Shelters – Community or Residential Shelters is a threshold requirement.
- For properties purchased under the Down Payment and Closing Cost Assistance Program either safe rooms or shelters which meet or exceed the applicable FEMA standard are a threshold requirement.
- The City developed a residential new construction tornado resiliency code in cooperation with the Oklahoma University. The code revisions were adopted by Moore City Council in June 2014.
- A Preliminary Feasibility Study of a Site Specific Debris Wall: The preliminary study was completed in November 2015. The City determined, with assistance from HUD, that the proposed hazard mitigation wall would not be eligible for CDBG-DR funding. The City could not find another resource to complete the hazard mitigation wall and the project was canceled in December 2015. Funds utilized for the feasibility study were moved to Planning activities.

### **Other Performance Standards**

- The availability of broadband infrastructure to provide Wi-Fi to tenants is a threshold requirement in multifamily new construction in accordance with Federal Register Notice [FR 5890-F-02](#).
- The City has established Crime Prevention Through Environmental Design (CPTED) as a threshold requirement for multifamily new construction.

### **(C) Use of Urgent Need**

The City will be using the Urgent Need national objective in carrying some of the proposed infrastructure activities.

## **SECTION III: CITIZEN PARTICIPATION, ACCESSIBILITY, AND AMENDMENTS**

### **(A) Public Comment**

Per HUD regulations, this draft Substantial Amendment will be posted from June 30<sup>th</sup>, 2017 to July 30<sup>th</sup>, 2017 to allow for the public to comment on the proposed use of funds.

A meeting of the CDBG Advisory Committee Meeting will be held at 6:00 pm on July 13, 2017

In addition, a public hearing will be held on July 17, 2017 at 6 pm in the City Council Room at the City of Moore.

In 2010, the City of Moore prepared and adopted a Citizen Participation Plan (CPP) as required by HUD. This plan provides citizens with information on how they can participate in the City's CDBG Program. Upon notification that the City would receive a CDBG-DR grant allocation, the City modified this Plan in accordance with Federal Register Notice Vol. 78, No. 43 published on Tuesday, March 5, 2013. The City further clarified elements of the CPP with the adoption of a revised CDBG/CDBG-DR Policy and Procedure Manual which was approved by City Council on October 16<sup>th</sup>, 2016

A summary of the Plan's main topics are as follows:

- Standards for Participation: require a minimum of 2 community-wide meetings
- Access to Adequate and Timely Information: provides for full public access to records and information regarding all aspects of the CDBG and CDBG-DR Programs
- Public Hearings: requires at least 2 public hearings and a minimum 7-day advance notice publication and notice postings of public hearings.
- Non-English Speaking Residents: provides for accommodation of non-English speaking residents
- General Accessibility: provides for the needs of all citizens by removing, to the extent possible, the physical, informational, social, and psychological barriers to participation

- Obtaining Citizen Views: provides a variety of methods for the submission of citizen comments; directly to the Community Development Department via phone, mail, or e-mail, at CDBG Citizen Advisory Meetings, and at formal public hearings
- Consideration of Objection to Applications: requires the City to consider all citizen comments and views and publish written explanation of comments, encourages citizens objections to Plan approval to be directed to HUD
- Complaints: direct complaints to the CDBG Coordinator, requires the City to provide written responses within 15 working days, calls for the maintenance and annual review of complaints for the purpose of program improvements
- Technical Assistance: provides for the provision of technical assistance to anyone requesting help in the development of proposals, applications and views
- Publishing the Plan: requires the City to publish its plans prior to submission to HUD for approval for the purpose of gathering public views and comments
- Program Amendments: requires for reasonable advance notice and opportunity to comment on substantial changes to the approved Consolidated Plan, Annual Action Plan and CDBG-DDR Action Plan
- Contingency and Local Option Activities: makes provision for unapproved plan activities

The City conducted two public hearings in the development of the CDBG-DR Substantial Amendment. The first public hearing, held on July 13<sup>th</sup>, 2017, identified community needs; whereas, the second public hearing, held on July 17<sup>th</sup> considered plan recommendations. Both public hearings were widely advertised by postings of meeting notices in select public places, and publishing of the notices in the *Daily Oklahoman* and *Moore American* newspapers at least 14-days prior to the meeting. All published notices invited interested parties to submit written comments directly to the CDBG Coordinator.

On June 30<sup>th</sup>, 2017 the CDBG-DR Substantial Amendment was published for public comment. The thirty (30) day comment period ended on July 30<sup>th</sup>, 2017 Additional public comments were accepted at the 2nd public hearing held on that date. The proposed Substantial Amendment was presented to the City Council and approved on July 17<sup>th</sup>, 2017. City Council Persons, the Mayor,

City Manager, and City staff attended.

A chronology of public hearings conducted as part of the CDBG-DR Substantial Amendment is as follows.

- **Public Hearing #1: July 13, 2017, Substantial Amendment**
  - Posted notice at City Hall, Public Library, and Brand Senior Center 7-days prior to the hearing
  - Posted notice to City's Website 14-days prior to public hearing
- **Public Hearing #2: July 17, 2017 Substantial Amendment**
  - -Posted notice at City Hall, Public Library, and Brand Senior Center 7-days prior to the hearing
  - -Posted notice to City's Website 14-days prior to public hearing

Time was allowed during each public hearing for public comment. Comments were received during this time and addressed. The City welcomes public comments and encourages citizens to submit written comments. All written comments are submitted to the City of Moore, CDBG Coordinator, 301 North Broadway Moore, OK, 73160. Each comment will be considered and addressed by the City of Moore.

Comments were received either in person, by phone or written comments were received. Transcripts from each of the meetings and public hearings are provided in the appendix.

The City of Moore values the public's opinion by accepting citizen and other interested parties' comments throughout development and implementation of its CDBG-DR program. Every effort is made to reach minorities, non-English speaking residents, as well as persons with disabilities. For all meetings, comments, questions, and other information, a Spanish-speaking translator was made available on a daily basis. Translation services for other languages were available, if requested. No requests were made for Spanish or other translations.

To increase the public awareness of the CDBG-DR Program, the following public notification methods were used:

- Public Postings at Moore City Hall, Moore Public Library, and the Moore Brand Senior Center, were used for all public hearings, CDBG Advisory Committee meetings, and plan summary notices. Notices were posted at least 14 days in advance of the meetings.
- Website: Public Hearing and CDBG Advisory Committee meeting notices were posted on the City of Moore website at least 14 days prior to meeting date. CDBG and CDBG-DR updates and documents are also posted on a dedicated Grants page on the Community Development Section of the City of Moore website.
- Public Hearing notices posted on Cox Cable Channel 20 (Moore's local community access cable channel) at least 14 days prior to hearing date.

## **(B) Accessibility**

### *Limited English Proficiency*

Requests for this Substantial Amendment or related documents in alternate formats consistent with the provisions of federal requirements related to limited English proficiency must be directed to the Capital Planning and Resiliency Department.

### *Physical, Informational, Social and Psychological Barriers*

All public meetings will address the accessibility needs of all citizens by removing, to the extent possible, the physical, informational, social, and psychological barriers to participation.

To demonstrate a commitment to diversity and inclusion, City public meeting notices will specifically invite persons with physical, informational, social, and psychological barriers to participate and shall provide a contact and timeframe for obtaining assistance.

### **(C) Substantial Amendment**

A Substantial Amendment to the Action Plan shall be defined as:

1. a change in program benefit or eligibility criteria;
2. the addition or deletion of an activity; or
3. the allocation or reallocation of more than \$1 million between activities.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures previously identified herein. Specifically, a public notice will be published and comment will be sought when assistance programs are further defined (i.e. change in program benefit or eligibility criteria) or when funding allocations are further refined by type of activity and location, if applicable.

Citizens, units of local government, and our community partners will be provided with advanced notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. An electronic copy of the proposed Substantial Amendment will be posted on the official Tornado page of the City website. Hard copies will also be made available upon request. No less than seven days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval.

### **(D) Non-Substantial Amendments to the Action Plan**

Non-Substantial Amendments are defined as minor, one that does not materially change the activities or eligible beneficiaries. This provision should not be construed as allowing the general administrative budget to exceed the allowable limit. Additionally, a Substantial Amendment is not required in the case where the City is simply requesting additional funding from HUD. HUD must be notified in advance of a Non-Substantial Amendment becoming effective. Non-Substantial Amendments are not subject to the public notification and public comment procedures previously identified herein. All Amendments to the Action Plan (substantial and non-substantial) will be numbered sequentially and be posted to the Tornado page on the City website.

## **SECTION IV: DEADLINES AND PROJECT TRACKING**

Each project is scheduled to start in 2014-2019, and all funds will be expended within two years of obligation, as required by HUD. The City will expend 100 % of funds in areas most impacted and distressed by the 2013 disaster.

The City will follow provisions of 24 CFR 570.489(b) that permits the City to reimburse itself for otherwise allowable costs incurred by itself or its recipients, sub-grantees, or sub-recipients on or after the incident date of the covered disaster. Section 24 CFR 570.200 (h)(2)(i) will not apply to the extent that it requires pre-agreement activities to be included in a consolidated plan. All the pre-agreement costs such as engineering, planning, administration, and program delivery are exempt from the environmental process in accordance with 24 CFR 58.34.

The City will track project activity using the DRGR System. The DRGR system was developed by HUD and is used as a reporting tool to review activities of CDBG-DR recipients. As required by HUD, the City will create activities for each proposed project to monitor the timeliness of the activities and to ensure that performance outcomes and expenditures are consistent with those reported in the CDBG-DR Action Plan.

As the City continues its needs assessment and disaster recovery efforts progress, the City will request further obligation of funds or changes to proposed activities through substantial amendment(s) or non-substantial amendments to the CDBG-DR Action Plan, per HUD requirements.



