

# 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 November 2, 2018 through December 3, 2018

City of Moore, Capital Planning and Resiliency

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## **Executive Summary**

### **(A) Overview**

The fourth substantial amendment modifies the City of Moore's Community Development Block Grant Disaster Recovery action plan of 2014 as follows:

#### Housing –

The substantial amendment (SA) updates the housing needs assessment based on current data, and adjusts the budgets by amending the allocation to provide for the remaining funds needed to complete the down-payment, closing costs, and equity buy-down assistance program and the multi-family development.

#### Infrastructure –

The SA updates the infrastructure needs assessment based on current data, and adjusts the budgets by allocating funding from the planning and public facilities projects to infrastructure.

#### Public Facilities –

The SA updates the public facilities needs assessment based on current data, and reallocates remaining funds to the infrastructure project.

#### Economic Development –

The status of the economic development project has not changed since its updated needs assessment in the third substantial amendment.

#### Resiliency –

The SA provides for no change in the closed status of the resiliency project.

#### Planning –

All planning activities are complete. The SA reallocates funds remaining to the infrastructure project.

#### Administration –

The SA provides for no change in the status of the allocation to administration.

### **(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 is responsible for 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 consists of six city council members, two elected from each ward, and the Mayor.

The department of Capital Planning and Resiliency (CP&R) is charged with the responsibility of overseeing the administration of Community Development Block Grant (CDBG), CDBG-Disaster Recovery, and other State and Federal grant funds. The department reports to an Assistant City Manager. CP&R manages contracts for various infrastructure and public facility projects undertaken by the city.

**(C) Proposed Activities**

Infrastructure Activities –

The city will continue to address and complete activities identified in the Infrastructure Recovery and Implementation Plan (IRIP). In support of recovery efforts in the area, improvements to the channel area of Little River Park just north of the proposed LMI multi-family redevelopment is in progress. Remaining unexpended funds, if any, will assist with street repairs to Janeway Avenue, as it serves this park and the redevelopment.

Housing Activities –

The city is working to complete the LMI multi-family redevelopment and the down-payment, closing cost, and equity buy-down assistance program.

**Proposed Projects Summary:**

Table 1: Proposed Project Summary		
Activity	Current Allocation	Proposed Allocation
Administration	\$ 2,610,000.00	\$ 2,610,000.00
Economic Revitalization	-	-
Housing	16,000,000.00	16,126,902.04
Infrastructure	26,941,317.74	30,057,911.30
Planning	4,648,682.26	1,949,906.58
Public Facilities	2,000,000.00	1,455,280.08
Resiliency	-	-
<b>Total</b>	<b>\$ 52,200,000.00</b>	<b>\$ 52,200,000.00</b>

## Plan Narrative

### (A) Needs Assessment

#### 1. Housing

##### Initial Needs Assessment

The May 20, 2013 tornado significantly impacted the city's housing sector. The majority of the property in Moore that was affected 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 affecting residents of all demographics.

Using the methodology outlined by FEMA, the estimates of affected residential dwellings were over 2,400. Out of the total, approximately 1,091 dwellings were destroyed, and an additional 1,400 damaged. Residential dwellings included two apartment complexes, one mobile home complex, and single family residences.

A rapid response team of structural engineers surveyed the tornado area beginning on May 21, 2013. Their findings confirmed that of the 814 homes affected by the tornado, much of the damage was caused by blowing debris. Pieces of buildings, outbuildings, and trees became projectiles as the high winds blew them into homes. Dwellings were damaged by parts of other dwellings, such as 2 x 4 structural timber, piercing through exterior walls. Many windows were blown out by flying debris. Commercial shipping containers, vehicles of all weights and sizes, and 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 homes.

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

##### Updated Housing Needs Assessment

The housing rehabilitation program, initiated in July 2015, assisted three homes with unmet needs to repair damages. The program closed in October 2016.

The city's focus remains on the immediate needs of its LMI residents as it manages the down-payment, closing cost, and equity buy-down assistance program and the completion of a multi-family LMI development.

The down-payment, closing cost, and equity buy-down program has yielded successful closings for two low-income families since the program began in July 2017. Applications for LMI households continue to be processed with the goal of placing more families in permanent homes. Although the response has been significant and there are a number of qualified applicants, the availability of eligible homes is less than originally anticipated. Therefore, the budget is being amended in order to reallocate funds to the multi-family LMI development activity. The program will continue until the allocated funds have been expended.

The city completed a master plan for the multi-family LMI development activity in July 2016, and City Council adopted the plan on August 1, 2016. The plan addressed the replacement of rental units lost in the tornado; providing for at least 200 rental units, of which at least 80% would 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 property was referred to as *Royal Rock* on the original plat, and therefore was originally referred to as the *Royal Rock Development*.

The master plan for the development labels it as SW 17<sup>th</sup>/Janeway. The development has been named *The Curve*, and will be recorded as such on the updated plat.

Land, purchased by the city in October 2015, has been improved and prepared for the building of the LMI multi-family development. The site has been prepared for construction by completing asbestos removal, demolition, site leveling, and the installation of utilities. The city is working to successfully complete a disposition and development agreement in order to convey the property to a developer. The construction of this development will provide the replacement of 244 rental homes, with a 20-year covenant on the land that ensures at least 80% of the mixed-income development remain available to low to moderate income households.

## 2. Infrastructure

### Initial Needs Assessment

The tornado had an extensive impact on the city's infrastructure. It moved across the city, causing direct and indirect damage in 23 neighborhoods. Local roadways were significantly damaged as a result of this disaster. Trees and debris made many roads impassable. The roads were significantly damaged further as a result of disaster recovery activities to remove debris.

In addition to roadways, the event caused damages to other public infrastructure. Public water supplies and wastewater systems suffered damages that caused a decrease in demand for services, interrupted services, and losses in revenues for both the city and public businesses.

The magnitude of this federally-declared disaster is expected to create challenges for years to come, the result of which is to stretch the city's general fund beyond the assistance provided by insurance coverages and FEMA public assistance. The city's initial estimate of unmet need in infrastructure repairs was in excess of 50 million dollars.

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) in order to assess community impacts, identify unmet needs, and plan and prioritize recovery activities. The IRIP refined original damage estimates, and identified needed public infrastructure improvements that totaled \$162 million. Forty-seven projects that encompass 158 sub-projects within the tornado were identified.

### Updated Needs Assessment

The city has completed 14 infrastructure activities; restoring and constructing damaged roadways and sidewalks, repairing and constructing sewer and water systems, and rebuilding public parks. An infrastructure activity is in progress in the area of the Little River public park and the multi-family LMI development site to restore and improve the channel running through and along-side these disaster damaged properties. This activity will serve to mitigate future flood events, improving the rate of storm-water flow. Any remaining allocated infrastructure project funds will be utilized to repair a roadway that was damaged by the event and recovery responses. The roadway serves these two properties.

## 3. Public Facilities

### Initial Needs Assessment

The tornado's impact on public facilities included damages to publically-owned utilities, damage to parks and recreational areas, and damage to public buildings. Each of the public buildings damaged was insured, leaving no unmet need for buildings. Although public utilities were insured, it was determined that more than \$18 million in unmet need existed. Unmet need for repairs and restoration to

public parks and recreational facilities was determined to be slightly more than \$17 million. The total unmet need for public facilities was over \$35 million.

#### Updated Needs Assessment

Disaster Recovery funds, along with donations from Devon Energy and a Cardinal Care Grant awarded through the Oklahoma City Community Foundation enabled the city to recover from damages at Little River Park caused by a direct hit from the May 20, 2013 tornado.

Recovery included the construction of a playground, splash pad and trail, restoring the park for public use in September 2017.

#### 4. Economic Development

##### Initial Needs Assessment

Over 200 businesses within the city were affected by the tornado. Businesses experienced short- and long-term damages in the form of property damage, power outages, wind damage, and operations losses. Significant damages resulted in interruption of utility services that had a negative effect on the economy, and a negative effect on the ability of businesses to recover after the storm.

These damages also affected the city, reducing budgeted revenues to just 42% of expected in the first six months following the storm. The reduction in revenues increased the difficulty of providing recovery services needed by its citizens and businesses. The city estimated, that after insurance, Small Business Administration loans, and FEMA payments were applied, there was almost \$2 million in unmet need remaining.

##### Updated Needs Assessment

Business sectors in Moore have largely recovered from the tornado impacts. The city's sales tax base has stabilized, and businesses have been rebuilt.

#### 5. Resiliency

##### Initial Needs Assessment

The city had allocated \$3.7 million to create a hazard mitigation wall along the interstate corridor designed to deflect future tornado debris. A feasibility study was completed in November 2015.

##### Updated Needs Assessment

The city determined, with assistance from HUD, that the proposed hazard mitigation wall would not be eligible for CDBG-DR funds. Funds expended for the feasibility study were moved to planning, and the activity was canceled in December 2015. The unexpended funds were reallocated to infrastructure activities. The city has been unable to locate another resource to fund the hazard mitigation wall.

**(B) Allocation of Funds**

The following is a summary of the city’s proposed substantial amendment of grant agreement five:

Table 2: Allocation of Funds				
Program Category	Amount Previously Obligated Rounds 1 - 4	Original Obligation #5	Proposed Amendment Obligation # 5	Proposed Total Obligation
Administration	\$ 2,043,507.29	\$ 566,492.71	\$ 566,492.71	\$ 2,610,000.00
Economic Revitalization	-	-	-	-
Housing	3,975,338.99	12,024,661.01	12,151,563.05	16,126,902.04
Infrastructure	15,758,347.15	10,492,291.85	14,299,564.15	30,057,911.30
Planning	1,894,704.98	3,444,656.02	55,201.60	1,949,906.58
Public Facilities	1,353,376.56	646,623.44	101,903.52	1,455,280.08
Resiliency	-	-	-	-
<b>Total</b>	<b>\$ 25,025,274.97</b>	<b>\$ 27,174,725.03</b>	<b>\$ 27,174,725.03</b>	<b>\$ 52,200,000.00</b>

*Infrastructure Activities*

Table 3: Infrastructure Activities					
National Objective	Budget	Expended	Allocation	Status	Number of Activities
URG	\$ 12,421,059.94	\$ 2,290,321.30	\$ 12,421,059.94	In Progress	1
URG	13,385,013.96	13,385,013.96	13,385,013.96	Complete	10
LMA/LMI	4,251,837.40	4,251,837.40	4,251,837.40	Complete	3
<b>Project Total</b>	<b>\$ 30,057,911.30</b>	<b>\$ 19,927,172.66</b>	<b>\$ 30,057,911.30</b>		



*Housing Activities*

The city has completed a housing rehabilitation activity, initiated a down-payment, closing cost and equity buy-down activity, and initiated the construction of an LMI multi-family development in order to replace rental homes destroyed by the storm.

Table 4: Housing Activities					
Activity	National Objective	Budget	Expended	Allocation	Status
Housing Rehabilitation	LMI	\$ 59,639.39	\$ 59,639.39	\$ 59,639.39	Completed
DPA	LMI	100,000.00	33,765.66	100,000.00	In Progress
Multi-family Redevelopment	LMI	15,967,262.65	5,364,156.25	15,967,262.65	In Progress
Project Total		\$ 16,126,902.04	\$ 5,457,561.30	\$ 16,126,902.04	

*Public Facilities Activities*

Table 5: Public Facilities Activities				
Activity	National Objective	Allocation	Expended	Status
City Park Playground	URG	\$ 610,666.03	\$ 610,666.03	Completed
City Park Splashpad	URG	844,614.05	844,614.05	Completed
Project Total		\$ 1,455,280.08	\$ 1,455,280.08	

*Economic Development Activities*

The city did not allocate funds for any unmet economic development need. No new unmet needs have been identified.

*Planning Activities*

Planning activities in order to respond and rebuild after the 2013 disaster have been completed. The city allocated and expended \$1,949,906.58 on planning activities as it worked to recover from the 2013 disaster.

An Infrastructure Recovery and Implantation Plan was completed in March 2015 in order to identify, catalog and prioritize needs resulting from the disaster. The plan included assessment of damages to streets, storm water drainage, water and sewer lines, and sidewalks and trails within the tornado area. The plan has been instrumental in identifying infrastructure activities and unmet needs in the most impacted areas.

A feasibility study of a 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 city completed a comprehensive storm water management and drainage plan. The plan evaluated existing and potential drainage and flooding problems within the City and recommended capital improvement projects and/or programmatic measures to correct or avoid such problems. The plan included a compliance and monitoring plan for the Lake Thunderbird total maximum daily load (TMDL) and a five-year storm water quality management plan. The plan was completed in January 2017.

The city updated its comprehensive land-use plan. The City of Moore needed an updated comprehensive plan due to the myriad of changes within the community since the last plan was adopted in 2006. The City needed to reevaluate its vision, goals, and priorities for the future as it rebuilt from multiple tornados. 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.

The city expended planning funds to upgrade its GIS system, and thereby increasing its capacity to respond to future disasters. The upgrade allowed improvements to infrastructure to be recorded, and more readily available to mitigate damages incurred by disasters. Location of emergency shelters for both residential and commercial structures are recorded in order to assist with recovery efforts. The upgrade is was completed in December 2017.

### **(C) Leveraging Funds**

The city has leveraged the CDBG-DR funds in order to achieve the best use of grant funds. General funds have been employed to cover management staff time, grant employee benefits earned, and legal counsel expenses.

Donation funds were available and used to assist with disaster recovery efforts at Little River Park.

## **CITIZEN PARTICIPATION, ACCESSIBILITY, AND AMENDMENTS**

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

This draft substantial amendment will be posted from November 2, 2018 through December 03, 2018 to allow for the public to comment on the proposed use of funds.

Comments may also be received at a CDBG Advisory Committee public meeting that will be held at 5:30 pm on November 15, 2018. The draft will be reviewed by the committee for approval.

The draft substantial amendment will be presented to city council at a public hearing on December 3, 2018 at 6:30 pm.

These meetings will be held at Moore City Hall in the city council chambers, 301 N Broadway Ave, Moore, OK 73160.

The City of Moore encourages participation from all its citizens. If participation at any public meeting is not possible due to a disability (such as a hearing or speech disability) or a language barrier,

notification to the City Clerk at least forty-eight (48) hours prior to the scheduled public meeting is encouraged to allow the City to make the necessary accommodations.

The City conducted two public hearings in the development of the CDBG-DR Substantial Amendment. The first public hearing, held on November 15, 2018, identified community needs; whereas, the second public hearing, held on December 3<sup>rd</sup>, 2018, considered plan recommendations. Both public hearings were widely advertised by postings of meeting notices in select public places, posting on the City of Moore's website, and publishing of the notices in the *Daily Oklahoman* at least 30 days prior to the meeting. All published notices invited interested parties to submit written comments directly to the Project Grants Manager.

On November 2, 2018 the CDBG-DR Substantial Amendment was published for public comment. The thirty (30) day comment period ended on December 3, 2018. 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 December 3, 2018. City Council Persons, the Vice 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: November 15, 2018, Substantial Amendment**
  - Posted notice at City Hall, Public Library, and Brand Senior Center 13 days prior to the hearing
  - Posted notice to City's Website 13 days prior to public hearing
  - Published Public Hearing Notice in the *Daily Oklahoman* on November 2, 2018
- **Public Hearing #2: December 3, 2018 Substantial Amendment**
  - Posted notice at City Hall, Public Library, and Brand Senior Center 30 days prior to the hearing
  - Posted notice to City's Website 30 days prior to public hearing
  - Published Public Hearing Notice in the *Daily Oklahoman* on November 2, 2018

Time was allowed during each public hearing for public comment. No comments were received during this time. The City welcomed public comments and encouraged citizens to submit written comments. All written comments were to be submitted to the City of Moore, Project-Grants Manager, 301 North Broadway Moore, OK, 73160 or by email at [cdbg@cityofmoore.com](mailto:cdbg@cityofmoore.com). The City did not receive any additional comments from the public.