

Moore, Oklahoma

Disaster Recovery Program

Action Plan

Submitted to the

U.S. Department of Housing and Urban Development

By Moore, Oklahoma

March 22nd, 2014

Updated May 4, 2023

Table of Contents

I. Executive Summary	5
II. Introduction	12
III. Disaster Impact and Response	16
Overview	16
Summary of Damages	16
Housing.....	17
Economic Development	17
Public Facilities	18
Infrastructure	18
Direct Damages	19
Immediate Response.....	20
Lasting Effects	24
IV. Unmet Needs Assessment	25
Housing	25
Needs Assessment: Owner-Occupied Housing (Rehabilitation, Reconstruction and New Construction)	25
Needs Assessment: Multifamily Housing.....	33
Needs Assessment: Homelessness, Transitional and Supportive Facilities, Units and Populations	35
Economic Revitalization	36
Needs Assessment	36
Infrastructure	40
Needs Assessment	40
Public Facilities	43
Needs Assessment	43
Resiliency Investments.....	44
Needs Assessment	44

V. Proposed Use of the Funding	45
Housing (Rehabilitation, Reconstruction & New Construction).....	46
Single Family.....	46
Multi-family Housing	47
Housing Goals.....	48
Owner-occupied Housing Program	48
Owner-occupied Housing Programs: Summary of Program Eligibility and Program Priorities	49
Multifamily New Construction Program	52
HUD-assisted Housing, McKinney-Vento funded shelters, other HUD Properties	54
Infrastructure	55
Infrastructure Goals.....	55
Infrastructure Program	55
Eligibility Threshold Requirements	56
Funding Priorities	56
Construction / Reconstruction of Streets and Drainage Systems.....	56
Public Facilities	57
Economic Revitalization	57
Mitigation & Resiliency	57
Resilience Goals	57
ShelterMoore - Moore Residential Storm Shelter Program	57
Eligibility Threshold Requirements	58
Funding Priorities	59
Planning	59
Administration	60
VI. Federal, State, Local, Non-profit, and Individual Sources of Funding to be Leveraged.....	61
VII. CDBG-DR Program Allocations.....	63
Planning	64

Planning Goals.....	64
Administration	65
Long-Term Recovery Planning.....	67
Short to Mid-Term Housing Demand.....	67
Impact of Tornado Frequency on Housing Market.....	68
Area Master Plan.....	69
Capital Improvements Plan.....	69
Capacity Improvements Plan	69
VIII. Other Program Requirements	70
Green Building Standards	70
Compliance and Monitoring.....	71
Duplication of Benefits	71
Program Income.....	74
Capacity Building.....	76
Minority Owned, Women Owned and Sections 3 (Disadvantaged) Business.....	76
Policy: Contracting with Small and Minority Businesses, Women Business Enterprise and Labor Surplus Firms	76
Definitions	77
Citizen Participation	78
Action Plan Amendments	81
Substantial Amendments to the Action Plan.....	81
Non-Substantial Amendments to the Action Plan	82
Performance Reports	82
Citizen Complaint Procedures	83
Limited English Proficiency.....	84
APPENDICES	85

I. Executive Summary

The City of Moore Action Plan for Community Development Block Grant Program Disaster Recovery (this “Action Plan”) is required to be submitted by the City of Moore (the “Moore”) to the U.S. Department of Housing and Urban Development (“HUD”), as a condition to its receipt of \$52,200,000 of federal funding under the Community Development Block Grant – Disaster Recovery (CDBG-DR) Program (the “Funding”).¹

The Funding was authorized under The Disaster Relief Appropriations Act (the “Act”), which was signed into law by President Barack Obama on January 29, 2013. The allocation of the Funding to Moore is intended primarily to enable it to address immediate unmet housing, public facilities, infrastructure and economic revitalization needs within the City of Moore resulting from the tornado of May 20th, 2013

Moore must submit this Action Plan and obtain its approval by HUD before it can receive any portion of the Funding.



Figure 1: F5 Tornado in Moore, OK - May 20, 2013

This Action Plan describes the programs and activities for which Moore intends to expend the Funding in compliance with the federal requirements set forth in public notices released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant

(CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07).

This above guidance is hereafter referenced collectively as the “Federal Register Notice”.

In accordance with the Federal Register Notice, this Action Plan must also provide an assessment of the need for the Funding and the City’s public outreach and citizen participation practices. Moore is obligated to ensure that the processes, procedures, and fiscal and administrative controls to be used in the course of expending the Funding are sufficient to safeguard the Funding from waste, fraud and abuse.

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the City. Accordingly, HUD is allowing Grantees to request less than the full funding amount in a Partial Action Plan. The City of Moore will pursue incremental obligation of the Funding to support its tornado relief and restoration programs and activities to ensure compliance with HUD’s deadlines.

This Action Plan fully complies with the Federal Register Notice and describes the City’s intended use of all of the Funding. The following table identifies planned activities and full allocations for the entire \$52.2 million in accordance with all grant agreements.

Moore Action Plan: CDBG-DR Allocations by Grant Agreement							
Program Category	Obligated Round #1	Obligated Round #2	Obligated Round #3	Obligated Round #4	Obligated Round #5	Round #5 Extension	Total Obligation
Administration	\$ 460,743.49	\$ 788,469.77	\$ 63,653.20	\$ 288,576.14	\$ 357,433.09	\$ 651,124.31	\$ 2,610,000.00
Economic Revitalization	-	-	-	-	-	-	-
Housing	39,838.45	3,275,162.03	541,447.62	115,291.01	1,525,643.94	10,603,106.40	\$ 16,100,489.45
Infrastructure	116,475.48	8,326,305.05	6,768,887.37	1,533,488.45	9,671,269.63	4,264,244.14	\$ 30,680,670.12
Planning	582,942.58	610,063.15	97,910.22	62,644.40	-	-	\$ 1,353,560.35
Public Facilities	-	-	1,353,376.56	-	101,903.52	-	\$ 1,455,280.08
Resiliency	-	-	-	-	-	-	-
Total	\$ 1,200,000.00	\$ 13,000,000.00	\$ 8,825,274.97	\$ 2,000,000.00	\$ 11,656,250.18	\$ 15,518,474.85	\$ 52,200,000.00

Moore Action Plan: CDBG-DR Allocations by Grant Agreement							
Program Category	Obligated Round #1	Obligated Round #2	Obligated Round #3	Obligated Round #4	Obligated Round #5	Round #5 Extension	Total Obligation
Administration	\$ 460,743.49	\$ 788,469.77	\$ 63,653.20	\$ 288,576.14	\$ 357,433.09	\$ 651,124.31	\$ 2,610,000.00
Economic Revitalization	-	-	-	-	-	-	\$ -
Housing	39,838.45	3,275,162.03	541,447.62	115,291.01	1,525,643.94	10,603,106.40	\$ 16,100,489.45
Infrastructure	116,475.48	8,326,305.05	6,768,887.37	1,533,488.45	9,671,269.63	4,264,244.14	\$ 30,680,670.12
Planning	582,942.58	610,063.15	97,910.22	62,644.40	-	-	\$ 1,353,560.35
Public Facilities	-	-	1,353,376.56	-	101,903.52	-	\$ 1,455,280.08
Resiliency	-	-	-	-	-	-	\$ -
Total	\$ 1,200,000.00	\$ 13,000,000.00	\$ 8,825,274.97	\$ 2,000,000.00	\$ 11,656,250.18	\$ 15,518,474.85	\$ 52,200,000.00

The Act provides that funding under the CDBG-DR Program must be used “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 resulting from a major disaster.”

In addition to specifying the amount of funds allocated to Moore, the Federal Register Notice also sets forth, among other requirements, the programs or activities for which the Funding can be used, and the national objectives that each program or activity must meet.

The only areas in which the Funding can be expended are within the City of Moore.

Broad categories for CDBG-DR Program eligible activities include: Housing, Infrastructure, Public Facilities, Economic & Commercial Revitalization, Resiliency, and Planning. A limited portion of the funds may be used for the cost of administering the CDBG-DR Program.

Some of the specific CDBG-DR Program eligible activities that HUD has identified include the following:

- Acquisition of real property;
- Acquisition, rehabilitation and construction of public works and facilities;
- Buyouts;
- Code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties;
- New construction, reconstruction and rehabilitation of public housing;
- Repair or rehabilitation of infrastructure;
- American Disability Act improvements;
- Rental assistance (limited); storm mitigation measures;
- Special economic development including: grants and loans to SBA-defined small businesses, job training, and the revitalization of business districts; fair housing counseling;
- Homeownership counseling and assistance; and
- Assistance to Community-Based Development Organizations for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, and administrative costs, including actions to meet the grantee’s certification to affirmatively further fair housing.

With respect to CDBG-DR Program eligible activities, Public Law 113-2 grantees must ensure that at least 50% of its CDBG-DR grant funds are used for activities that benefit low- and moderate-income

("LMI") persons. However, on September 9, 2017, HUD granted a waiver to lower the low and moderate income overall benefit to 42%. LMI persons are defined for the purposes of the CDBG-DR Program as persons and families whose income does not exceed 80% of the area median income ("AMI"), as determined by HUD. This 42% requirement applies to the Moore's expenditure of the entirety of the funding, less administration and planning, and does not apply to each individual program or activity.

As set forth in the Federal Register Notice, the Funding cannot be used for any of the following purposes: to assist second homes (as defined in IRS Publication 936); and to assist private utility companies or organizations.

In addition, all expenditures of the Funding, other than Administration and Planning, must meet at least one of the three federally-mandated national objectives (each a "National Objective"): low- and moderate income benefit; elimination of slum and blight; and urgent need.

Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is not an activity for which any of the Funding can be used unless a specific waiver of such ineligibility has been granted by HUD and/or the federal Office of Management and Budget.

Moore may request additional waivers of program requirements by providing sufficient evidence that such waiver is necessary for the effective administration of the Funding. As of the date of this Action Plan, Moore has not requested any such specific waivers. Moore reserves the right to pursue such waivers under all broad program categories, as may be appropriate and necessary as additional information relative to "unmet need" and other parameters is obtained.

Moore will administer the Funding through application processes. The eligibility requirements identified by Moore include the following (though not all requirements will apply to all types of projects):

- Applicants must be "Eligible Applicants" as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each proposed activity must be an "Eligible Activity" as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each project must meet at least one National Objective and such National Objective(s) must be fully supported within the application;

- Consistency with the goals and strategies of the Action Plan must be demonstrated;
- Fair Housing and Equal Opportunity compliance must be evidenced by a Fair Housing Action Plan (Appendix E) that complies with Moore’s guidelines/policies; and
- Each applicant must be in compliance with all existing assistance agreements with Moore and cannot be in default under any HUD-administered program, nor debarred by the Federal government, the State of Oklahoma, or Moore.

In addition to meeting the federal obligations associated with the Funding, this Action Plan reflects the fact that the City’s first priority is to get financial assistance to as many affected residents as possible, assisting them in the repair or reconstruction of their homes to get their lives back in order.

The City will use the Funding to provide financial assistance directly to assist eligible homeowners, Public Housing Authorities, transitional housing developers, shelter developers, and/or multi-family property developers¹. The City will also use the Funding to finance other eligible projects ensuring the City’s recovery from the damage caused by the tornado in all areas for which the Funding can be used under applicable federal regulations. This Action Plan describes the priorities that the City has used to allocate the Funding among the eligible activities.

¹ There are no Public Housing Authorities within Moore’s City limits. There are 571 HUD subsidized units, none of which have an unmet need. There are no transitional, supportive housing or other Continuum of Care or McKinney-Vento sponsored housing within the City of Moore.

II. Introduction



Figure 2: Ariel View of Moore Oklahoma Tornado Damage

The City of Moore is a medium-sized city in the Oklahoma City MSA, with a population of approximately 55,081. Although the Moore Housing Market Area can be described in general terms as upper middle-class, research has shown that approximately 23% of all households in Moore are considered to be of moderate to very low income. As of 2008, Moore had an estimated 4,500 households who fall into the income bracket of \$34,999 or less and about 2,000 households are on varying degrees of public assistance. In 2010, the City of Moore became a Community Development Block Grant Entitlement Community, with an average allocation of \$280,000 per year.

On Monday, May 20, 2013 a massive, mile-wide F-5 tornado with winds up to 200 mph killed 24 people during 35 terrifying minutes of destruction across the City of Moore. In this short time frame, Moore saw two schools, a school administration building, a regional hospital, 90 businesses and over 2,400 housing units damaged or destroyed.

In January 2013 Congress passed, and the President signed into law, The Disaster Relief Appropriations Act, also known as Public Law 113-2 (the “Act”), which appropriated approximately \$50 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act, as well as disasters occurring in the remaining months of Fiscal Year 2013. Of those funds, approximately \$16 billion was set aside for the Community Development Block Grant - Disaster Recovery Program (the “CDBG-DR Program”), to be administered by the United States Department of Housing and Urban Development (“HUD”). The Moore tornado and other tornadoes affecting Oklahoma during the period April 19th through May 31st, 2013 were included by HUD in the allocation created by the Act. On August 30th, 2013 HUD announced an initial allocation of \$26.3 million in CDBG-DR funds for the City and on June 3, 2014 another \$25.9 million in CDBG-DR funding was allocated to Moore.

On December 16, 2013, HUD released its initial CDBG-DR Program allocations and program requirements in the Federal Register at Vol. 78, No. 241, Page 76154 in a notice entitled: “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

HUD’s allocation of CDBG-DR Program funds was based on its estimate of critical unmet needs for repairing and rebuilding housing, public facilities, infrastructure, and economic revitalization in the most impacted areas, primarily using data provided by FEMA.

This Action Plan primarily focuses on Moore’s proposed use of the Funding, specifically the immediate unmet needs of individuals and families for housing that was affected by the Moore tornado as well as assisting the local government in repairing, rebuilding and increasing the resiliency of infrastructure and public facilities, within Moore city limits.

In accordance with the Federal Register Notice, Moore is required to prepare and submit this Action Plan to describe the proposed use of the Funding, including:

- The proposed use of the Funding;
- The criteria for eligibility under any program or activity for which the Funding is to be used;
- How the use of the Funding will address the long-term recovery, restoration of housing, infrastructure, and economic revitalization in most impacted and stressed areas;
- The process for Citizen Participation; and

- The standards for grant administration.

This Action Plan must be submitted to HUD within ninety (90) days of the Effective Date of the Federal Register Notice (i.e. March 23, 2014). The City must obtain HUD’s approval of the Action Plan before Moore can access the Funding.



Figure 3: Damages at Plaza Tower Elementary

The programs and activities set forth in this Action Plan and the policies, processes, and procedures in accordance with which Moore will administer the Funding will comply with all applicable federal requirements, including all requirements specifically set forth in the Federal Register Notice. Without limitation, these requirements include the requirement that 50% of the funds, less planning and administration, must be expended to benefit low- and moderate-income (“LMI”) persons and that all of the Funding must be used for eligible activities that achieve at least one of the three federally-mandated national objectives (each a “National Objective”): low- and moderate income benefit; elimination of slum and blight; and urgent need.

The Federal Register Notice also imposes strict expenditure and compliance deadlines on Moore. Accordingly, HUD has strongly recommended that Moore not request the entire Funding at the time of its submission of this Action Plan. Based on this advice, Moore, like other entities to which CDBG-DR Program funds were allocated by HUD, will pursue the incremental obligation of the Funding to support

the Moore tornado relief and restoration programs and activities (as applications are approved and projects become shovel ready) to ensure compliance with HUD's deadlines. HUD has assured Moore that as it submits additional requests for additional portions of the Funding to be released; such funds will be available promptly and without delay.

This Action Plan was developed after extensive public outreach, data collection, consultation and input from a host of stakeholders, constituents, organizations and other agencies, as described in more detail in this Action Plan.

III. Disaster Impact and Response

Overview

On May 20, 2013, the City of Moore experienced an EF5 tornado that cleared a path of destruction 17.5 miles long and up to 1.3 miles wide through the City from west to east, destroying over 1,000 single family homes, 94 duplexes, 53 mobile homes and affecting 2 apartment complexes. Over 2,400 homes were affected by this disaster. The aftermath of this disaster has caused great need in the community for housing, public infrastructure, public services, and business recovery, among others. Figure 4 illustrates the path of the May 20, 2013 tornado damage through various census tracts within the City of Moore.

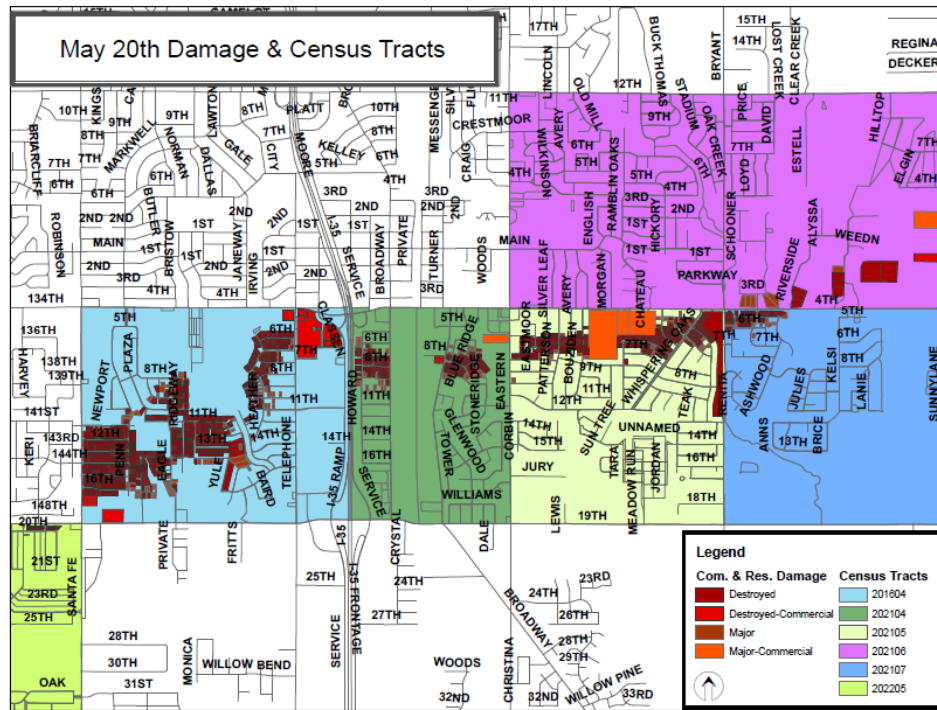


Figure 4: May 30th Tornado Path Through Moore

Summary of Damages

HUD requires the City to complete an unmet need assessment that quantifies the funding needed for recovery. The assessment is used to determine the extent of unmet needs and to help prioritize among those needs, with a focus on low- and moderate- income households and the most impacted areas. The assessment must evaluate three core recovery sectors: housing; the economy; and infrastructure.

Housing

The 2013 tornado disaster significantly impacted the City's housing sector. The majority of the property in Moore 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, affecting residents of all demographic and income statuses.

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 experienced minor or major damage or were completely destroyed in this disaster.

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.

Economic Development

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 are at 42% of the budgeted amount with 50% of the fiscal year expired. When compared to year-to-date expenses the City faces a \$1.1 million shortfall that has reduced fund reserves.

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

Public Facilities

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 are currently being rebuilt. Plaza Towers Elementary is under construction with the 300 students relocated to the Central Junior High School, known locally as Plaza 800. Briarwood Elementary will be rebuilt in 2014, with the 567 students currently 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 is in parks and recreational facilities at \$17.2 million. In total, the City estimates an unmet need for public facilities of \$35.9 million.

Infrastructure

The tornado had an extensive impact on the City's infrastructure. As the tornado moved across the City, it hit 23 neighborhoods causing significant direct and indirect damage. This disaster also caused significant damage to local roadways. 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 will require major investments to recover.

The magnitude of the storms impact stretched the City’s general fund account. Funding from FEMA’s Public Assistance program did help cover some of the costs, but the City faced the ongoing challenge of paying for the damages for years to come.

The City’s initial estimate of unmet in infrastructure need is in excess of \$50 million at the time of the first submission of the action plan. The Infrastructure Recovery and Implementation Plan (IRIP) later identified \$162 million in infrastructure improvements.

Direct Damages

Current data indicates the following:

TABLE 1: DIRECT DAMAGES TO BUILDINGS					
Type	Affected	Minor	Major	Destroyed	Totals
Single Family	369	445	190	1,086	2,091
Mobile Home	0	0	32	21	53
Apartments	0	0	347	0	347
Business	12	39	2	37	90
Public Facilities	0	0	1	3	4
Total Buildings	381	484	382	1,147	2,585

Table 2 provides the estimated dollar amount of damages by category

TABLE 2: MOORE DIRECT DAMAGES			
<u>Category</u>	<u>Type</u>	<u>Amount</u>	<u>Total</u>
Housing			\$188,810,000
Economic Development			\$84,840,000
Public Facilities			
	Public Buildings	\$ 73,000,000	
	Public Utility	15,000,000	
	Equipment	650,000	
	Parks & Recreational	12,750,000	
	Public Buildings	<u>70,300,000</u>	
Subtotal			\$171,700,000
Infrastructure			\$162,000,000
Total Damages			\$607,350,000.00

Immediate Response

Days before the tornado struck Moore, weather forecasters recognized the potential for severe weather in the Oklahoma City area. The Norman Office of the National Weather Service discussed the possibility for severe weather as early as Friday, May 17th. On Saturday, weather elements began to converge and on Sunday there was severe weather in the area, including a tornado that struck eastern Norman and western Shawnee, Oklahoma.

At 10:00 a.m. on Monday, May 20th, the National Weather Service Forecast Office in Norman, Oklahoma conducted a briefing by Internet for public safety officials within their county warning area. During the briefing, forecasters discussed the likelihood and potential timing of severe weather. After the briefing, the Norman office of the NWS distributed further information about the impending severe weather by various means – the Internet, Twitter®, and Facebook®. In turn, the City’s Emergency Management office used similar electronic means to further distribute this information to the public. The Director of the City’s Emergency Management office made sure that the local school district was aware of the potential for

severe weather as well as the possible timing of the event – prior to the regular release of school for the day. At 1:11 p.m., the Superintendent of Schools issued information to the district staff cancelling all evening activities, but indicating that the school would stand by its regular time for dismissal.

A tornado watch for our area was issued by the National Storm Prediction Center at 1:10 p.m. Shortly thereafter and as the building storms were just beginning to show on the radar, the City's Emergency Management office activated the local volunteer storm spotters and sent them into the field to observe the impending weather. At 2:12 p.m., the first weather warning was issued for a severe thunderstorm. Finally, a tornado warning was issued at 2:40 p.m. that included northern Cleveland County and the City of Moore.

Following actions outlined in the City's Emergency Operations Plan and the Severe Weather Operations Guide, the City activated all 36 outdoor warning devices (tornado sirens) to warn the public at large. The City also distributed the warning by electronic and social networking means. In addition, the warning was broadcast by NOAA's All-Hazards Radio and our Oklahoma City area radio and television stations.

The tornado warning was reissued by the National Weather Service at 3:01 p.m. with the heightened "tornado emergency" status.

The situational awareness in the City's small Emergency Operations Center included watching the tornado live on feeds from all three of the local television stations. Local media dispatched helicopters, experienced storms chasers, and news crews to follow the storm. From their live "wall-to-wall" coverage and the reports of the City's spotters, residents could track the progress of the tornado.

At 3:17 p.m., telemetry from several outdoor warning devices showed that they had lost commercial electrical power, giving Emergency Management officials an indication that the tornado had actually entered the city limits, at that time. Since roughly two-thirds of the warning devices operate from battery power, officials were still able to continue alerting those within our City.

Emergency Management officials could see visually that the approaching tornado was both large and violent. The National Weather Service later determined the tornado was approximately ½ mile wide on the ground, causing EF-5 damage beginning almost at the Moore city limits. As noted previously, the tornado destroyed Briarwood Elementary School and then Plaza Towers Elementary School – the site where 7 young students tragically lost their lives. Other persons were killed or injured in homes near the school. The tornado continued in an east-northeast direction across the southern end of the City's largest

cemetery, and crossed through the heart of Little River Park. It returned into residential neighborhoods and neared Interstate 35 in the center of the community. As it approached the highway, it destroyed several businesses, including a convenience store where 3 more people lost their lives.

The tornado struck and destroyed the Moore Medical Center - the local hospital - but due largely to advance planning, shelter in place exercises, practicing evacuations and warning no one was injured or killed. Nearby, the United States Post Office was struck, as well as a credit union where employees took shelter in the vault and survived. It narrowly missed a large movie theatre complex and then moved east into additional residential areas.

Before the tornado completed its path of destruction, it damaged one of the city's clear well water storage and pumping stations, taking it off-line until emergency repairs could be made the next day. This became a key challenge when the tornado later severed power to Oklahoma City's Lake Draper water plant. These two facilities provide much of the water for Moore, and the water situation was critical for the first day or two after the tornado.

The Moore Public Schools District is the third largest in the State of Oklahoma, with 32 educational campuses in Moore and south Oklahoma City serving over 21,000 students. As the tornado moved through the east side of Moore, it struck Highland East Junior High School, damaging the main school building and destroying the gymnasium/choir building. In total, two elementary schools and the district information technology center were destroyed, and one junior high school and the district administration building were heavily damaged.

Two of the City's 36 outdoor warning devices were destroyed outright by the tornado, with two more damaged beyond repairs. Several other sirens received damage to their electrical components due to the power issues caused by this storm and another that followed on Friday, May 31st.

Search and rescue operations started immediately. The newly constructed Fire Administration building and Fire Station #1 is located just south of the path of the tornado. Station #1 personnel chose to move their fire apparatus out of the storm's path rather than taking shelter in their station's tornado safe room. This allowed both the preservation of much needed rescue equipment as well as quick deployment into the damage area after the wind passed. Moore police personnel also immediately responded and assisted in rescuing many survivors. By evening, there were hundreds of rescuers from all parts of Oklahoma on site, including our State's Incident Management Team, Oklahoma Urban Search and Rescue Task Force 1, and many assets of the Regional Response System. The Incident Command Post for the event was

established in the truck bays at Fire Station #1. Incident Command remained in place through a visit from President Obama that occurred on Sunday, May 26th.

FEMA debris removal began within a day after the tornado. Since residents are experienced with tornadoes, many already knew to move their debris to the curb and began doing so almost immediately. This helped the City and FEMA expedite the debris removal. Approximately 85% of the debris was picked up within two months of the event and debris removal was finished by the first week of September. As of September 4th, the City had picked up and removed over 172,000 tons (11,600 truckloads) of debris.

Thousands of volunteers from throughout the nation arrived to assist in removal of debris and to begin relief activities in the impacted areas. For instance, the City's largest cemetery contained a great amount of debris. On Wednesday before Memorial Day, the City marshaled over 2,500 emergency volunteers who cleaned the cemetery within 4 hours. Local Boy Scouts were able to safely post American flags in the cemetery, allowing the community the opportunity to still honor veterans on Memorial Day.

Through the organization of ServeMoore – a local grassroots coalition of community members and faith-based groups that organized in the hours after our event – more than 35,000 volunteers spent over 230,000 hours assisting Moore residents.

In addition, the City and its schools received thousands of monetary donations that will also assist in recovery from the disaster. Entertainers Toby Keith and Blake Shelton raised over \$9 million dollars for statewide recovery efforts. The American Red Cross raised \$3.75 million for Moore, which has been dedicated to the construction of safe rooms or shelters.

Two ad hoc committees, the Oklahoma Disaster Recovery Project (ODRIP) and the Local Area Recovery Committee (LARC) were formed to response to the disaster. ODRIP's focus has been to fund local agencies responding to the disaster, while LARC's focus has been to respond to the individual needs created by the disaster.

ODRIP consists of the American Red Cross, Salvation Army, Catholic Charities, United Methodist Committee on Relief, and the Society of St. Vincent de Paul. LARC consist of over thirty local groups, including organizations, charities, and faith based entities.

Lasting Effects

As the City moves forward, long term recovery needs will become more apparent. The damage to the City's housing stock, local economy, and public infrastructure will have a long term lasting impact on the City's financial health and local affordable housing options for LMI residents. Due to significant damage from the tornado, a 90-unit duplex development was destroyed. Although re-development plans for approximately 125 rental units have been submitted, the projected rental rates of \$700-1200 per month will be well above the means of LMI residents. Additionally, the 173-unit mobile home park that provided housing for LMI residents has announced that it will be closing due to the negative impacts of the tornado. This will be a big loss of affordable housing for the City's LMI residents, as there are currently no plans for the private housing industry to replace those affordable units.

With the significant loss of housing and commercial businesses, the Moore Public Works Authority is currently experiencing a dramatic decrease in revenue from utility billing, at 9% below budgeted collections, or \$1 million in deficit. Additionally, with the high loss of real property within the City, revenue from General Obligation Bonds (based on the valuation of real property) to fund capital improvements throughout the City are anticipated to fall short of the projected collections. The decrease of both revenue streams will be a significant challenge in the future, as many capital projects such as street, waterline, sewer line, and public facility construction may be underfunded.

IV. Unmet Needs Assessment

Housing

Needs Assessment: Owner-Occupied Housing (Rehabilitation, Reconstruction and New Construction)

Overview of the Moore Housing Market

Based on data obtained from the Cleveland County real property tax assessment database, the City of Moore contains a total of 21,199 residential dwelling units comprised single family detached, mobile homes, duplexes, and garden apartments.

In 2012, the Moore housing inventory contained 69% owner occupied homes, compared to 59% of owner occupied homes in the State of Oklahoma and 66% in the nation. The renter occupied inventory in Moore was 26% in the same year, compared to 29% in the state and 34% in the nation. The percentage of rental occupied homes rose from 22% in 2000 to 26% in 2012, following a national trend.

Based on an inventory of 1,899 apartments and 853 duplexes/triplexes of which 90%, or 768, are likely rentals, the balance of approximately 2,845 renter occupied dwellings, are single family detached units.

Between 2010 and 2013 the highest number of homes, 1,213, were sold in the \$100,000 to \$150,000 range, followed by 1,138 home sales in the \$150,000 to \$200,000 range. Just over 1,000 homes were sold below \$100,000, and 296 homes were sold above \$250,000. Four (4) single family home developments comprise a total of 721 new units have been proposed.

Most of the remaining developable land in Moore falls into the Rural Residential and Urban Residential/Low Density zoning designations, with only small amounts of acreage that could be developed to Medium Density or High Density Residential. In total, vacant and underutilized land could support a range of 2,123 to 16,478 residential units at full build out, with a midpoint of 9,300 units. The minimum build out of 2,123 units is estimated at approximately 4-7 years, the maximum build out of 16,478 units is estimated at 34-55 years, and the midpoint of 9,300 units is estimated at 19-31 years².

² Comprehensive Market Analysis: City of Moore; December 2013; RKG Associates; page 6

To date, the housing recovery from the tornado has been strong. Of the 1,086 homes destroyed, the Building Inspections Department has issued 442 new residential housing permits. It is estimated that approximately 50% of the new starts are for existing residents within the tornado area, with the remaining new starts being built as spec homes, by the home building industry. It is anticipated that the number of new residential building permits being issued within the tornado area will begin to taper off as the supply of new housing within the tornado area exceeds demand.

Owner Occupied Unmet Need

The highest unmet need in the area of Owner Occupied Housing (Rehabilitation, Reconstruction and New Construction) is rehabilitation resulting from wind and associated storm damage. The table below provides a breakdown of FEMA’s Unpaid Losses and Open Claims.

Data collected by FEMA and Moore indicates over 5,600 registrants in the City of Moore, damages in excess of \$188 million and an unmet housing need of \$32.5 million.

TABLE 3: FEMA UNPAID LOSSES	
Total Estimated Housing Damages	\$188,810,000
FEMA Unpaid Losses (unmet need)	\$ 32,449,128
Estimated Rehabilitation	\$ 10,000,000
Estimated Reconstruction or Replacement	\$ 22,449,128

Subsequent to the tornado, two LMI rental developments were demolished by the owners. The estimated replacement value of the 269 units LMI units demolished is in excess of \$40 million.

Moore opened an owner-occupied housing rehabilitation program in July 2015. However, it did not generate the expected demand. The success of private fundraising efforts through church groups and donations, coupled with a high level of volunteer involvement from communities around the county led to most housing rehabilitation needs by the Local Area Relief Council (LARC). Due to the lack of demand, the City closed the program in October 2016 after assisting three households.

In July of 2017, the City opened a down payment and closing cost assistance program. Although the response was significant and there were a number of qualified applicants, the availability of eligible homes

was less than originally anticipated. After assisting three households, the program closed in December 2019.

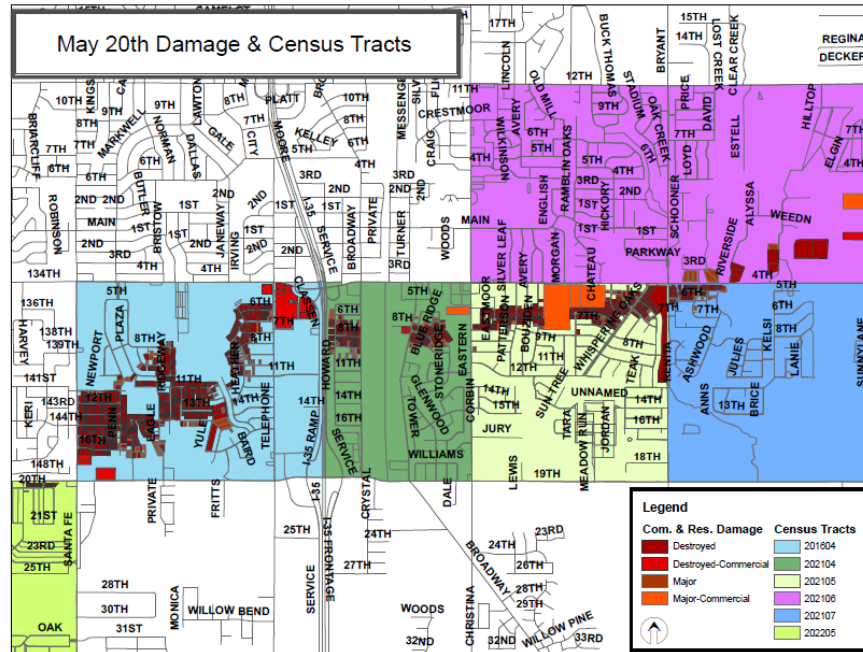


Figure 5: Path of May 20th Tornado Through Moore Census Tracts

The tornado crossed six Census Tracts in the City. Census Tract demographic data is provided for each tract. The Tracts are presented west to east reflecting the path of the tornado.

Census Tract 2022.05

Census Tract 2022.05 was the western starting point of the tornado within the City of Moore. Tract 2022.05’s total population in 2012 was 6,212. Over 26 percent (26.2%) of Tract 2022.05’s population is minority. The largest minority populations are Black and American Indian with 8.7% and 4.1% of the population, respectively. Ten percent (10.0%) of the population is elderly.

Tract 2022.05’s estimated median household income in 2012 was \$64,728, higher than the City’s median household income of \$56,892 and the State’s median household income of \$44,891. The estimated poverty rate for Tract 2022.05 was nearly four percent (3.7%) lower than the City’s poverty rate of 7.6% and the State’s poverty rate of 12.3%.

Tract 2022.05's homeownership rate in 2012 was 92.6%, higher than the City's homeownership rate of 74.6% and the State's homeownership rate of 67.2%³. The current estimated median house or condo value for the City is \$113,800, up 3.4% over the last year. Rents in the City have increased 10.9% since January of 2012. The current average advertised rent is \$1,095 a month for a three bedroom, two bath unit⁴.

Census Tract 2016.04

Census Tract 2016.04 extends from Santa Fe on the west to I-35 on the east, south to 20th Street and north to 134th Street. Tract 2016.04 received the most overall damage from the tornado within the City. Tract 2016.04's total population in 2012 was 4,053. Nearly eleven percent (10.8%) of Tract 2016.04's population is minority. The largest minority populations are American Indian and Other with 3.8% and 3.0% of the population, respectively. Nearly twenty-eight percent (27.8%) of the population is elderly.

Tract 2016.04's estimated median household income in 2012 was \$44,987, lower than the City's median household income of \$56,892 and higher than the State's median household income of \$44,891. The estimated poverty rate for Tract 2022.05 was nearly nine percent (8.9%), higher than the City's poverty rate of 7.6% and lower than the State's poverty rate of 12.3%.

Tract 2016.04's homeownership rate in 2012 was 71.6%, lower than the City's homeownership rate of 74.6% and higher than the State's homeownership rate of 67.2%⁵. The current estimated median house or condo value for the City is \$113,800, up 3.4% over the last year. Rents in the City have increased 10.9% since January of 2012. The current average advertised rent is \$1,095 a month for a three bedroom, two bath unit⁶.

Census Tract 2021.04

Census Tract 2021.04 extends from I-35 on the west to Corbin on the east, south to 19th Street and north to 50th Street. Tract 2021.04's total population in 2012 was 2,299. Over fourteen percent (14.4%) of Tract 2021.04's population is minority. The largest minority populations are American Indian and Asian with

³ State and City Data from American Community Survey (January 2014); Tract Data from the 2010 Census

⁴ Zillow Rent Index and Zillow Median House Value Index (January 2014)

⁵ State and City Data from American Community Survey (January 2014); Tract Data from the 2010 Census

⁶ Zillow Rent Index and Zillow Median House Value Index (January 2014)

8.2% and 2.1% of the population, respectively. Nearly thirteen percent (12.8%) of the population is elderly.

Tract 2021.04's estimated median household income in 2012 was \$66,278, higher than the City's median household income of \$56,892 and higher than the State's median household income of \$44,891. The estimated poverty rate for Tract 2021.04 was four percent (4.0%), lower than the City's poverty rate of 7.6% and lower than the State's poverty rate of 12.3%.

Tract 2021.04's homeownership rate in 2012 was 82.4%, higher than the City's homeownership rate of 74.6% and higher than the State's homeownership rate of 67.2%⁷. The current estimated median house or condo value for the City is \$113,800, up 3.4% over the last year. Rents in the City have increased 10.9% since January of 2012. The current average advertised rent is \$1,095 a month for a three bedroom, two bath unit⁸.

Census Tract 2021.05

Census Tract 2021.05 extends from Corbin on the west to Renita on the east, south to 19th Street and north to 5th Street. Tract 2021.05 received the second most overall damage from the tornado within the City. Tract 2021.05's total population in 2011 was 4,330. Nearly twenty-five percent (24.7%) of Tract 2021.05's population is minority. The largest minority populations are Two or More Races and African-American with 8.3% and 4.3% of the population, respectively. Approximately eight percent (8.4%) of the population is elderly.

Tract 2021.05's estimated median household income in 2012 was \$58,456, higher than the City's median household income of \$56,892 and higher than the State's median household income of \$44,891. The estimated poverty rate for Tract 2021.05 was seven percent (7.3%), lower than the City's poverty rate of 7.6% and lower than the State's poverty rate of 12.3%.

Tract 2021.05's homeownership rate in 2012 was 82.9%, higher than the City's homeownership rate of 74.6% and higher than the State's homeownership rate of 67.2%⁹. The current estimated median house or condo value for the City is \$113,800, up 3.4% over the last year. Rents in the City have increased

⁷ State and City Data from American Community Survey (January 2014); Tract Data from the 2010 Census

⁸ Zillow Rent Index and Zillow Median House Value Index (January 2014)

⁹ State and City Data from American Community Survey (January 2014); Tract Data from the 2010 Census

10.9% since January of 2012. The current average advertised rent is \$1,095 a month for a three bedroom, two bath unit¹⁰.

Census Tract 2021.07

Census Tract 2021.07 extends from Renita on the west to the City line on the east, south to 19th Street and north to 5th Street. Tract 2021.07 received damage in the northwest corner of the tract.

Tract 2021.07 total population in 2011 was 2,053. Twenty percent (20%) of Tract 2021.07's population is minority. The largest minority populations are African-American and Two or More Races with 7.7% and 4.8% of the population, respectively. Nearly eleven percent (10.9%) of the population is elderly.

Tract 2021.07's estimated median household income in 2012 was \$77,760, higher than the City's median household income of \$56,892 and higher than the State's median household income of \$44,891. The estimated poverty rate for Tract 2021.07 was nearly two percent (1.9%), substantially lower than the City's poverty rate of 7.6% and the State's poverty rate of 12.3%.

Tract 2021.07's homeownership rate in 2012 was 90.1%, higher than the City's homeownership rate of 74.6% and higher than the State's homeownership rate of 67.2%¹¹. The current estimated median house or condo value for the City is \$113,800, up 3.4% over the last year. Rents in the City have increased 10.9% since January of 2012. The current average advertised rent is \$1,095 a month for a three bedroom, two bath unit¹².

Census Tract 2021.06

Census Tract 2021.06 extends from Corbin on the west to the City Line on the east, south to 5th Street and north to 12th Street. Tract 2021.06 received significant damage in the southern half of the tract. Tract 2021.06's total population in 2012 was 6,444. Nearly twenty-four percent (23.8%) of Tract 2021.06's population is minority. The largest minority populations are Two or More Races and American Indian with 11.1% and 4.4% of the population, respectively. Fourteen percent (14.3%) of the population is elderly.

¹⁰ Zillow Rent Index and Zillow Median House Value Index (January 2014)

¹¹ State and City Data from American Community Survey (January 2014); Tract Data from the 2010 Census

¹² Zillow Rent Index and Zillow Median House Value Index (January 2014)

Tract 2021.06’s estimated median household income in 2012 was \$65,964, higher than the City’s median household income of \$56,892 and higher than the State’s median household income of \$44,891. The estimated poverty rate for Tract 2021.06 was nearly ten percent (9.5%), higher than the City’s poverty rate of 7.6% and lower than the State’s poverty rate of 12.3%.

Tract 2021.06’s homeownership rate in 2012 was 87.5%, higher than the City’s homeownership rate of 74.6% and higher than the State’s homeownership rate of 67.2%¹³. The current estimated median house or condo value for the City is \$113,800, up 3.4% over the last year. Rents in the City have increased 10.9% since January of 2012. The current average advertised rent is \$1,095 a month for a three bedroom, two bath unit¹⁴.

Homeowners from each of these census tracts may apply for funding under the CDBG-DR owner-occupied rehabilitation program, if they meet all eligibility criteria.

TABLE 4: SUMMARY OF AFFECTED CENSUS TRACT DATA							
Tract	Population	Percent Minority	Median Household Income	Poverty Rate	Home Ownership Rate	Median House or Condo Value	Advertised Rent
2022.05	6,212	26.2%	\$64,728	3.7%	92.6%	\$113,800	\$1,095
2016.04	4,053	10.8%	\$44,987	8.9%	71.6%	\$113,800	\$1,095
2021.04	2,299	14.4%	\$66,278	4.0%	82.4%	\$113,800	\$1,095
2021.05	4,330	24.7%	\$58,456	7.3%	82.9%	\$113,800	\$1,095
2021.07	2,053	20.0%	\$77,760	1.9%	90.1%	\$113,800	\$1,095
2021.06	6,444	23.8%	\$65,964	3.7%	92.6%	\$113,800	\$1,095
Citywide	55,081	21.3%	\$56,892	7.6%	74.6%	\$113,800	\$1,095

¹³ State and City Data from American Community Survey (January 2014); Tract Data from the 2010 Census

¹⁴ Zillow Rent Index and Zillow Median House Value Index (January 2014)

Moore Demographics

The City of Moore's population grew from 41,699 in 2000 to 55,081 in 2010, over 32%, a faster pace than Cleveland County, the Oklahoma City Metropolitan Statistical Area (MSA), and the State of Oklahoma. According to the Oklahoma Department of Commerce, the population of Cleveland County is projected to grow an additional 14.5% in the next ten years, from 262,862 in 2012 to 303,105 in 2022.

Households grew at an even faster rate than population, increasing almost 36% from 2000 to 2010. Non-family households make up 26.7% of the households in Moore, and nearly 80% are one-person households. Moore's highly regarded school system has been largely credited for the attraction of family households to Moore.

The City of Moore's population is relatively young, having a median age of 32.0 in 2012, compared to 32.7 in the county, 36.3 in the state and 37.0 in the nation. Historic trends show the median age of Moore residents staying stable at 32 years of age since 2000. The percentage of persons age 65 and over is relatively low at 9.3%, compared to Cleveland County (10.2%), Oklahoma City (11.3%) and the State of Oklahoma (13.4%). The 65+ age cohort increased from 7.0 % in 2000 to 9.3% in 2012, at a faster rate than the comparative areas. Nonetheless, Moore's elderly population remains a smaller proportion. In the future, demand may strengthen for both age restricted housing, as well as targeted retirement and assisted living development.

Household income data shows that incomes in Moore (\$56,601) are higher than Cleveland County as a whole (\$53,759), and significantly higher than the State of Oklahoma (\$44,287). When adjusted for inflation to current dollars, median household incomes in Moore increased by 30.4%, from \$44,287 in 2000 to \$56,601 in 2012. Among the three comparative study areas, the City of Moore has the largest proportion of households (71.9%) that fall between the income ranges of \$35,000 and \$150,000¹⁵.

¹⁵ City of Moore Comprehensive Market Analysis; December 2013; RKG Associates; page 5

Needs Assessment: Multifamily Housing

Summary

Moore’s rental housing can be categorized into two major groups: purpose built rental housing, which is comprised primarily of apartments and duplexes and single family dwellings that are rented. Based on the preceding analysis, rental housing can be broken out as follows:

TABLE 5: MOORE RENTAL MARKET	
Apartments	1,899
Duplexes	768
Estimated Single Family Rentals	2,845
Total Rental Units	5,512

Moore has a total of 300 age restricted units for rent, and 302 group housing units that include assisted living and nursing homes.

Tornado damage in multifamily housing developments was concentrated in Census Tracts 2022.06 and 2021.05. In total, two multifamily developments comprising 357 units sustained major damage. In addition, 53 “for rent” mobile homes were either damaged or destroyed and 90 duplexes were damaged or destroyed. Subsequent to the storm, all 90 duplexes were demolished and the mobile home operator shut down the 179 unit mobile home park. The City does not contain any transitional or supportive housing, shelters, public housing authorities or public housing units.

TABLE 6: MULTIFAMILY DAMAGES			
Project Name	Units	Damage Category	Estimated Damage
The Greens at Moore	197	Major	\$4,925,000
The Fairways at Moore	150	Major	\$3,750,000
Royal Park Mobile Home Park	21	Destroyed	\$882,000
Royal Park Mobile Home Park	32	Major	\$800,000

Duplexes at 20th & Ridgeway	21	Destroyed	\$2,835,000
	69	Major	\$3,450,000
Totals	490	----	\$16,642,000

The Greens and The Fairways contain 357 units which suffered major damage. The Royal Park Mobile Home Park took a direct hit. Royal Park contained over 179 units, of which 21 were destroyed and 32 received major damage. A group of 90 duplexes adjacent to the mobile home park also took a direct hit.

HUD and Low Income Housing Tax Credit subsidized multifamily housing in Moore includes¹⁶:

TABLE 7: HUD & LIHTC PROPERTIES IN MOORE				
Project	Units	Subsidy	Type	Address
Jamestown Square	100	236(j)(1)	Family	1200 NW 10th Street Moore, OK 73170-1214
Langley Village	35	202	Elderly & Disabled	300 North Turner Avenue Moore, OK 73160-5944
Langley Village II	16	202	Elderly & Disabled	372 North Turner Avenue Moore, OK 73160-5956
Nottingham Square	159	223(a)(7)/221(d)(4)M	Family	2444 N Nottingham Way Moore, OK 73160-1254
-----	7	LIHTC	Family	1000 NW 18th St Moore, OK 73160
Regency Park Apartments	162	LIHTC	Family	2444 N Nottingham Way Moore, OK 73160-1254
Lyon's Estates	92	LIHTC	Family	214 N Eastern Ave Moore, OK 73160
TOTAL UNITS	571	-----	-----	

No HUD subsidized units were directly affected. No specific requests for rehabilitation funds were made by owners of multifamily property. The recently completed CMHA study identified the multifamily or rental projects in the pipeline:

- A 110-unit duplex project is planned;

¹⁶ HUD Multifamily Inventory of Subsidized Units; dated July 10, 2010 and HUD Low Income Housing Tax Credit Database; accessed 28 Dec 2013

- Two apartment projects totaling 702 units, which will be the first new apartments constructed in Moore in over ten years;
- Two senior housing projects totaling sixty-six (66) units;
- Thirty (30) additional apartment or condo units are on the drawing board for the Fritts property, but that could be subject to change depending on market conditions; and
- Additional projects in the “discussion stages” include 150 single family dwellings, 150 apartments, and 60 senior housing units¹⁷. None of the proposed developments include housing affordable to LMI residents.

Multifamily Housing Unmet Need

The greatest unmet need is the replacement of rental properties (units, duplexes and mobile homes) severely damaged or destroyed by the tornado. Approximately 269 units of rental housing which serve LMI persons were damaged by the tornado.

The estimated cost of the replacing rental housing units permanently lost due to the tornado and subsequent private activity is at least \$39.8 million. The rental mobile home units will be demolished to make room for retail and other unspecified uses. The total estimated replacement cost of the 179 mobile homes within the City limits of Moore has been estimated at \$26.8 million. The replacement cost of the ninety (90) rental duplexes has been estimated at \$19.8 million.

While the CHMA clearly shows an increase in the development of multifamily units overall, the targeting of the new units is primarily at market rate and above. There are no stated plans to build affordable housing units in the CHMA.

Needs Assessment: Homelessness, Transitional and Supportive Facilities, Units and Populations

As stated previously, there are no shelters, transitional or supportive housing, or public housing authorities or units within the City of Moore. The Continuum of Care of Cleveland County (“CoC Cleveland Co.”) serves Moore for homeless, transitional and supportive facilities. The CoC Cleveland Co. reports one person displaced by the May 20th tornado.

¹⁷ Comprehensive Housing Market Analysis: City of Moore, OK; December 2013; RKG & Associates; page 7

Although we recognize that the displacement of a number of families and households occurred as a result of the damage caused by the tornado, to date we have not received any information identifying any unmet need or a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities. Objectively, we recognize that the loss of units, and the displacement of these families, if even temporarily, has placed added stress on this valuable community resource. However, there are no homeless shelters or transitional and supportive housing facilities within the City limits of Moore.

Economic Revitalization

Needs Assessment

The May 20th tornado impacted the City's economy by temporarily or permanently curtailing specific economic activity including, for example, cancelled tourist visits, forgone business revenue due to shuttered offices and stores, and wages not paid to workers who could not work during the tornadoes' aftermath. In addition, the physical damage to residential housing, commercial buildings, public facilities, infrastructure and business equipment, and inventory required new unplanned expenditures that diverted funds that could otherwise be reasonably expected to have been directed towards savings and investment. In addition, the City lost sales tax and property tax revenue in the wake of the tornado. Current estimates indicate an overall impact to the City in excess of a half billion dollars including over \$452 million in direct damages.

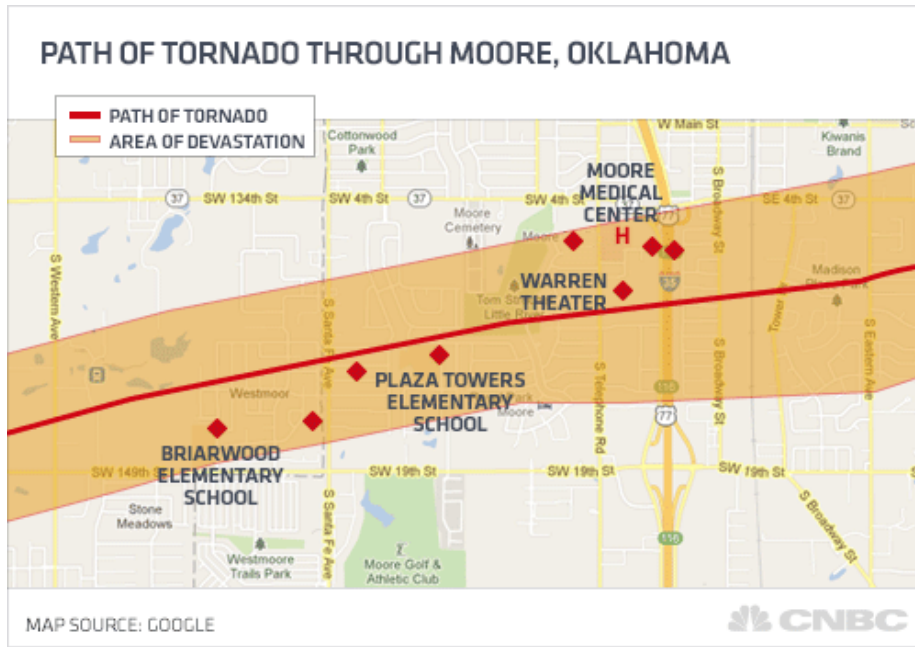


Figure 6: Tornado Path & Impacts

Disruption to the City's Economy

The May 20th tornado damaged commercial operations, transportation, energy distribution, and telecommunications infrastructure, which led to sustained disruptions to businesses and their employees.

The tornado devastated many businesses within the City, causing substantial commercial property damage and short-term and long-term business operations losses. In the entire City over 200 businesses were affected by the tornado, either through direct damage or indirect damage caused by power outages and wind damage. Total commercial losses are currently estimated at \$84,840,000.

Separately, damages to public infrastructure such as roads and 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.

TABLE 8: COMMERCIAL STRUCTURES DAMAGED IN THE CITY OF MOORE					
Type	Affected	Minor	Major	Destroyed	Totals
Businesses	12	39	2	37	90

Unmet Economic Development Needs

According to data gathered by the City, SBA, FEMA, and insurance claims data obtained by the City, there are unmet small business needs in the amount of approximately \$1.95 million. These activities include structural repairs (approximately \$1.9 million) and the repair or replacement of equipment (approximately \$468,000).

The following is a summary of the unmet needs related to building damage reported by NAICS classification:

TABLE 9: NAICS CODED STRUCTURAL BUSINESS DAMAGES				
Number of Businesses	NAICS Classification	NAICS Code	Total Estimated Damages	Total Unmet Need
1	Electric Power Transmission, Control, and Distribution	22112	\$1,500,000	\$250,000
2	Plumbing, Heating, and Air-Conditioning Contractors	23822	\$3,000,000	\$400,000
3	Other Building Equipment Contractors	23829	\$2,995,000	\$531,000
1	Motorcycle, Boat, and Other Motor Vehicle Dealers	44122	\$500,000	\$0
1	Automotive Parts and Accessories Stores	44131	\$30,000	\$1,500
3	Supermarkets and Other Grocery (except Convenience) Stores	44511	\$1,020,000	\$500
3	Convenience Stores	44512	\$880,000	\$153,000
2	Pharmacies and Drug Stores	44611	\$80,000	\$0
1	Women's Clothing Stores	44812	\$5,000	\$500
2	Children's and Infants' Clothing Stores	44813	\$15,000	\$1,500
1	Jewelry Stores	44831	\$600,000	\$100,000
4	Commercial Banking	52211	\$435,000	\$130,000
1	Credit Unions	52213	\$200,000	\$50,000
3	Insurance Agencies and Brokerages	52421	\$540,000	\$150,000
1	Title Abstract and Settlement Offices	54119	\$100,000	\$30,000

1	Technical and Trade Schools	61151	\$40,000	\$1,500
1	All Other Schools and Instruction	61169	\$40,000	\$560
1	Offices of All Other Health Practitioners	62139	\$20,000	\$0
1	General Medical and Surgical Hospitals	62211	\$22,500,000	\$0
1	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly	62331	\$30,000	\$0
1	Other Individual and Family Services	62419	\$50,000	\$0
1	Fitness and Recreational Sports Centers	71394	\$50,000	\$2,000
1	Bowling Centers	71395	\$110,000	\$0
1	All Other Amusement and Recreation Industries	71399	\$4,200,000	\$50,000
2	Restaurants and Other Eating Places	72251	\$60,000	\$30,000
1	Other Automotive Repair and Maintenance	81119	\$7,000	\$0
1	Hair, Nail, and Skin Care Services	81211	\$10,000	\$0
2	Dry cleaning and Laundry Services (except Coin-Operated)	81232	\$15,000	\$1,500
44	TOTALS	-----	\$39,032,000	\$1,883,560

Not included in the list are four strip shopping centers which sustained general property damages and damages to vacant storefronts. Businesses in strip shopping centers that were damaged are included in the list.

A wide range of businesses were impacted, with the greatest concentration of monetary damages in General Medical and Surgical Hospitals (\$22.5 million); Plumbing; Heating; and Air-Conditioning Contractors (\$3 million); and Other Building Equipment Contractors of various types (\$3 million).

All of the impacted businesses were either in the direct path of the tornado or received damages due to flying debris. The unmet needs reflected in the table above do not reflect potential mitigation or

resiliency costs. Data regarding such costs will be gathered through the application and project cost estimating process.

The following table is a summary of the equipment damage unmet needs reported by NAICS classification:

TABLE 10: NAICS CODED BUSINESS EQUIPMENT DAMAGES				
Number of Businesses	NAICS Classification	NAICS Code	Total Estimated Damages	Total Unmet Need
1	Other Building Equipment Contractors	23829	\$41,500	\$41,500
1	Convenience Stores	44512	\$4,000	\$ 500
1	Jewelry Stores	44831	\$2,500,000	\$400,000
1	Technical and Trade Schools	61151	\$15,000	\$1,000
1	All Other Schools and Instruction	61169	\$80,000	\$25,000
1	Restaurants and Other Eating Places	72251	\$5,000	\$500
6	TOTALS	-----	\$2,645,500	\$468,500

A range of businesses were impacted, with the greatest concentration of costs in Jewelry Stores (\$2.5 million); and All Other Schools and Instruction (\$80,000). Data gathered from the affected business indicates most losses were insured and the resulting unmet need is relatively small given the tornados overall economic impact.

Infrastructure

Needs Assessment

The tornado had an extensive impact on the City’s infrastructure. As the tornado moved across the City it hit 23 neighborhoods, causing 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, local 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 will require major investments to recover.

Based on the City's needs assessment survey, public outreach and FEMA reports, it is clear that Moore sustained significant damage to infrastructure as a result of the tornado of May 20th. Initial estimates indicate \$110,337,500 in overall infrastructure damages to the City. The City completed an Infrastructure Recovery and Implementation Plan (IRIP) to assess the amount of infrastructure damages.

Infrastructure Recovery and Implementation Plan (IRIP)

The project selection methodology utilized in the IRIP begins by subdividing the study area (Figure 5) into eight distinct assessment areas. Each assessment area generally encompasses a distinct neighborhood or district within Moore and may or may not include multiple development patterns or land use types. Assessment areas utilized in the IRIP include: Baer's Westmore (BW), Plaza Towers (PT), Kings Manor (KM), Southmoor(SM), Madison Place/Hunter's Glen (MH), Eastmoor/JD Estates (EJ), Heatherwood (HW), Estates of Wyndemere/Olde Stonebridge (EO), arterial roadway corridors (AR).

Within each assessment area, assessment sub-areas were developed. These assessment sub-areas represent smaller organizational units within each assessment area and serve as the basis for infrastructure assessment and project selection activities. The limits of each assessment sub-area has been developed based on existing development patterns and land use types as appropriate. Within each assessment sub-area, assessment of the existing infrastructure was completed across seven general infrastructure categories: streets, drainage systems, sanitary sewer collection systems, water distribution systems, sidewalks, bikeway/trail systems, gateway/streetscape.

In assessing a given infrastructure category within an assessment sub-area, points were awarded to each assessment sub-area based on infrastructure specific metrics developed through geographic information system (GIS) analysis as well as field inspection and observation. Each point awarded with a given infrastructure category to an assessment sub-area was adjusted by a weighing factor to reflect the relative importance of each metric contained within the scoring methodology of the subject infrastructure category. The developed methodology awarded points within each of the following infrastructure assessment categories: background data, condition, damage score, proximity analysis, low-moderate income benefit, health and safety, long term recovery/economic revitalization, and opportunity.

Once the assessment was completed in all categories, scores were summed from each infrastructure assessment category to generate an Infrastructure Rating Index (IRI) for the given infrastructure category within the sub-area. This IRI was compared against the IRI in all other assessment sub-areas to identify those assessment sub-areas where new infrastructure projects may be most warranted. Using this approach, an IRI was generated for each infrastructure category within each assessment sub-area. Once all IRI's were developed for each infrastructure category across each assessment sub-area, GIS analysis was completed to identify how IRI scores vary within the assessment sub-area as well as across the larger study area. Based on this analysis, logical project scopes were developed. As a result, each project scope developed had a Project Rating Index (PRI) equal to the summation of the IRIs it involves. Using this approach, a comprehensive list of infrastructure projects within the study area was developed. Projects with higher PRIs represented those infrastructure projects anticipated to have a more significant impact on Moore's recovery. This assessment is located in Appendix I of this action plan.

Table 11 provides a summary of the Infrastructure Damages and Unmet Need:

TABLE 11: INFRASTRUCTURE DAMAGES & UNMET NEED		
Activity	Total Estimated Damages	Total Unmet Need
Bikeway/Trail	\$6,650,000	\$4,700,000
Drainage	\$15,680,000	\$10,920,000
Gateway/Streetscape	\$34,560,000	\$24,785,000
Sanitary Sewer	\$18,100,000	\$12,170,000
Sidewalk	\$20,710,000	\$15,230,000
Street	\$53,940,000	\$30,560,000
Water Distribution	13,070,000	\$11,000,000
TOTALS	\$161,950,000	\$109,365,000

Infrastructure projects represent a wide range of unmet need encompassing numerous types of infrastructure repair including, for example, dredging existing drainage channels and repairing or replacing fences, sidewalks, and guardrails along critical roadways.

Public Facilities

Needs Assessment

Based on the City's needs assessment and FEMA reports, Moore sustained significant damage to public facilities as a result of the May 20th tornado. Current estimates indicate \$102.4 million in public facilities and publically owned utilities were damaged or destroyed.

TABLE 12: Public Facilities Damage and Unmet Need		
Activity	Total Damages	Total Unmet Need
Parks & Recreational Facilities	\$12,750,000	\$11,480,752
Public Buildings	\$70,300,000	\$0
Public Utilities	\$18,777,110	\$15,429,697
Equipment	\$650,000	\$0
TOTALS	\$102,477,110	\$26,910,449

The tornado compromised water and electrical utility systems which has caused significant disruption to the City's economy and have had a corresponding negative impact on businesses and residents trying to recover after the storm.



Figure 7: Norman Regional Hospital, Moore

The tornado financially impacted the Moore Public Works Authority (MPWA) due to the loss of income from homes and businesses within the City and \$18,777,110 in direct damages. Per the December 31, 2013 financial statement (exactly half of the MPWA fiscal year): Revenues are at 42% of budgeted amount with 50% of the fiscal year expired. When compared to year-to-date expense there is a \$1.1 million which has reduced the fund reserves.

Moore has identified four (4) potential projects with unmet needs totaling approximately \$12.75 million. These projects are all parks and recreational facility repairs.

The Plaza Towers and Briarwood Elementary schools and the Regional Medical Center are being rebuilt with insurance proceeds and other funds.

Resiliency Investments

Needs Assessment

Based on the City's needs assessment survey and public outreach, a significant demand exists for establishing safe rooms or shelters in private residences and public facilities within the City. Since the tornado, over 1,200 permits have been obtained to create safe rooms or install storm shelters in owner occupied units.

At public hearings and meetings held during the creation of the Action Plan, participants constantly referred to the need for safe rooms or shelters

In addition, the City recognized that some resiliency measures in either public facilities or infrastructure should be undertaken once an analysis of feasibility is completed.

V. Proposed Use of the Funding

A summary of the unmet needs and proposed allocations by activity category is set forth in the table below.

TABLE 13: SUMMARY OF UNMET NEEDS & PROPOSED ALLOCATIONS		
Activity	Unmet Need	Proposed Allocation
Housing	\$32,449,128	\$16,100,489.45
1. Owner-Occupied Housing (Rehabilitation & Reconstruction);		
2. Downpayment and Closing Cost Assistance; and		
3. Multi-family Housing (Rehabilitation & New Construction)		
Infrastructure	\$109,365,000	\$30,680,670.12
Public Facilities	\$26,910,449	\$1,455,280.08
Economic & Commercial Revitalization	\$2,362,060	----
Resiliency	----	-----
Administration	----	\$2,610,000
Planning	----	\$1,353,560.35
TOTAL	\$171,086,637	\$52,200,000

All of the programs to be administered in the project categories identified in the table above, with the exception of Administration and Planning, will achieve one or more of the National Objectives.

Housing (Rehabilitation, Reconstruction & New Construction)

Allocation \$16,100,489.45

TABLE 14: USE OF FUNDS			
Type of Assistance	Number of Units	Per Unit Average Estimated Cost	Allocation
Rehab Assistance Owner Occupied	3	\$19,782.66	\$58,447.54
Downpayment and Closing Cost Assistance	3	\$22,196.59	\$66,589.79
New Construction Multifamily	244	\$65,483.03	\$15,977,860.15
TOTAL UNMET NEED	250	-----	\$16,100,489.45

Single Family

In terms of volume, most of the damage caused by the tornado was to residential structures with over 2,400 units affected, damaged or destroyed. Getting individuals and families back in their homes is a top priority for Moore.

Data from FEMA, SBA, the Oklahoma Department of Insurance, and local surveys completed by the City indicate that approximately 2,491 homes were damaged or destroyed by the tornado. Moore's current count of units damaged or destroyed is 2,491 units. The total value of housing losses exceeded \$188 million. The high losses reflect the large number of single family units (1,091) destroyed by the tornado. After calculating insured losses, FEMA and SBA financial assistance and other benefits, the remaining unmet need for single family housing is estimated to be between \$20 and \$25 million representing rehabilitation and/or reconstruction of approximately 600 units. This range of estimated unmet housing needs anticipates that as the recovery process proceeds, additional unmet needs may present themselves including, for example, damages not previously known or estimated and the consideration of code compliance.

The number of homeowners whose unmet needs can be met through this allocation depends on the actual rehabilitation, reconstruction, or new construction costs and the ultimate number of homeowners who will be determined to be eligible for assistance with the Funding. In any event, the City will continue to work to prioritize assistance to LMI persons who have been most impacted. Of the 600 units

currently estimated to have unmet housing needs, approximately 210 are estimated to be ineligible for the Funding, leaving 390 units to be rehabilitated at an approximate cost of \$33,333 a unit.

Multi-family Housing

Approximately 357 multifamily units and 269 non-multifamily rental units were directly affected by the tornado.

The largest overall impact was to non-multifamily rental units with 53 rental mobile homes and 90 rental duplexes destroyed or damaged. Post tornado, all 90 duplexes were torn down and 179 rental mobile home units in Royal Park were slated for removal by the respective owners. All of the duplexes and mobile homes for rent had rents targeted at households who are LMI.

The City will focus multifamily efforts on new construction of multifamily units to replace a portion of the LMI units lost due to the tornado, in the Royal Park Mobile Home Park and in the duplexes.

Based on recent experience, the multifamily funding can be used to leverage other funding for affordable multifamily housing (e.g., 4% and 9% low-income housing tax credits, tax exempt bond financing, private financing, and federal historic tax credits and other local and federal funding) at a rate of four times (4x), (i.e. every CDBG-DR dollar yields approximately \$3 from another source). The City expects minimal leverage will be available for the 357 units requiring only rehabilitation and significant leverage will be available for the newly constructed units.

The unmet need estimate in this housing sector does not include construction of over 100 units of new affordable multifamily units that is needed in the CDBG-DR Program eligible areas. The need for additional affordable units is evidenced by the rent spike highlighted in the Needs Assessment sections below. As indicated in the Federal Register Notice, new construction of affordable units is an eligible activity with the funding. Moore has allocated funds to multifamily new construction.

The Funding will be used to provide financial assistance for the rehabilitation of damaged units; feasibility determinations for the construction of multifamily units within a proposed redevelopment area; and environmental, architectural and engineering activities for eligible projects.

Housing Goals

The City's housing recovery programs are designed to meet the unmet housing needs of the households most impacted by the tornado (i.e. the costs of repairs, reconstruction and new construction that insurance, FEMA and any other sources of funding does not cover). The objectives of the housing programs include helping people directly affected by the tornado by:

1. Replacing and rehabilitating homes, including identifying opportunities for mitigation enhancement measures;
2. Improving the resilience of their homes while restoring their buildings/residences;
3. Assisting homeowners, multifamily property owners, and other housing providers in completing applications for funding; and
4. Directing homeowners, multifamily property owners, and other housing providers to additional potential sources of funding.

To pursue these objectives, the City has developed a program that incorporates best practices from past disasters and builds upon stakeholder input from agencies and relevant organizations across the City, to ensure the diverse needs of residents and neighborhoods are appropriately addressed.

The City's strategy will balance speedy response with proper planning and support while considering and incorporating the distinct needs and resources of different neighborhoods. The City will manage all program operations and ensure that all appropriate accountability and oversight mechanisms are in place. To supplement the City's overall capacity to effectively and efficiently deliver CDBG-DR assistance, Moore will contract with Oklahoma City's Planning Department to implement the actual rehabilitation of owner occupied housing affected by the tornado. Moore will manage the application and intake process and Oklahoma City will manage the contracting and rehabilitation process. The principles of the Inter-local Agreement have been defined and agreed to.

Owner-occupied Housing Program

Based on lessons learned from past disasters, and the particular needs of the City's most impacted areas, the City will have a single owner-occupied housing program to provide funding both to property

owners that need only rehabilitation assistance and those that need substantial rehabilitation or reconstruction assistance.

The City staff and third-party contractors will provide assistance to potential applicants at the application and intake stage and then will work closely with homeowners eligible for assistance under this program to evaluate the extent of the damage and engage a contractor to perform the appropriate scope of construction work.

Owner-occupied Housing Programs: Summary of Program Eligibility and Program Priorities

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each property must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance, including, without limitation, the following activities:
 - Acquisition of real property; buyouts; code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties; new construction, reconstruction and rehabilitation of public housing; American Disability Act improvements; fair housing counseling; homeownership counseling and assistance; and actions to meet the State’s certification to affirmatively further fair housing.
- Impacted and Distressed Area – each property served must be located within the Moore City limits;
- Readiness to Proceed – each property must be capable of being undertaken immediately to provide outcomes to intended beneficiaries effected by the disaster;
- Feasibility – each property must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted areas;
- Consistency with Consolidated Plan/Action Plan – each property must be reflective of the goals, priorities and requirements of the City of Moore’s 2010-2015 Consolidated Plan; and

- No portion of the Funding may be used to reimburse the applicant for costs incurred prior to its application.

Funding Priorities

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the City to satisfy the federal requirement that at least 50% of the Funding benefit low moderate income persons;
- Projects that include deep income targeted units (i.e. units for extremely low income persons or families, the homeless or persons at risk of becoming homeless);
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective safe rooms and other activities designed to protect lives and harden the property in order to minimize reoccurrence of storm damage whenever possible.

Downpayment and Closing Costs Assistance Program

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:

Eligible Properties	Type	<ul style="list-style-type: none"> • Eligible properties are detached single-family residences used as the primary residence of the borrower. • Eligible properties must be unoccupied for 90 days before the home buyer signs a sales contract for the property.
	Price	<ul style="list-style-type: none"> • The price of the property cannot exceed \$138,000 for an existing residence, and \$180,000 for a newly constructed residence.
	Condition	<ul style="list-style-type: none"> • An appraisal of the property is required. • 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. • All units must meet or exceed Ordinance: 768(14) 3/17/14 Dwelling code 5-204 C
	Location	<ul style="list-style-type: none"> • The property must be located within the tornado impacted area. See boundary descriptions and maps in Appendix C: Property Requirements.
Eligible Applicants	<ul style="list-style-type: none"> • Households whose income is between 50% and 80% of the area median. • Total housing expenses cannot exceed 32% of the income or be less than 25% of income; • Debt-to-income ratio cannot exceed 42% of income. For more detail, please refer to the calculation worksheet in Appendix B: Buyer Eligibility Worksheet. • Buyer’s contribution is expected to be 1% of the price of home. Buyer’s contribution may only be utilized for equity. • Buyers must have three months of mortgage payments in the bank at closing. 	
Gifts	<ul style="list-style-type: none"> • 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"> • Family donations • Foundations • Religious or ecumenical groups • State or federal government • Eligible contributions are subject to first mortgage lender’s requirements. • All eligible contributions require a Gift Affidavit from the giver 	

CDBG-DR Requirements	<ul style="list-style-type: none"> • Loan origination fees cannot exceed 3% of total cost of home. • Estimated closing costs are anticipated to be 4% of the price of home. • Total assistance package, including the equity contribution, cannot exceed \$40,000. • All household members must provide proof of US citizenship or Resident Alien status. • All applicants must undergo a Duplication of Benefits review.
Ineligible Types of Financing	<ul style="list-style-type: none"> • Balloon Financing • Variable Rate Financing • Co-signers who are not or will not be primary residents of the home • Piggyback loans • Any loan type where the buyer(s) receive a payout at closing • Financing which requires additional subordination below the City’s second lien position
Deadlines and other requirements	<ul style="list-style-type: none"> • The application period opens upon the City of Moore’s announcement, and continues until program funds are expended. • The prospective homebuyer must submit an application.

Multifamily New Construction Program

The Multifamily New Construction Program will target the replacement of rental units destroyed by the tornado. These rental units include mobile homes, duplexes, and single family homes for rent. The City will seek to acquire land and provide site improvements and related infrastructure for new multifamily housing, particularly housing that will compensate for the loss of low-income rental housing. After identifying and acquiring the land, and making the necessary improvements the City will solicit bids through a Request for Proposals (“RFP”) for the development of new multifamily units. The RFP will provide detailed information, response times and other specific requirements. The general requirements of this program are as follows:

1. Eligible applicants may be for-profit and non-profit as well as public housing authorities;
2. The eligible applicant must have demonstrated capacity to develop, own and manage the proposed development for a period of not less than 20 years;
3. At least 51% of the new units must be affordable to LMI families;

4. Units to be constructed must meet applicable State and local codes at completion and meet the federal requirements for green building and energy efficiency;
5. The developer must include either safe rooms or shelters which meet the applicable FEMA criteria and are adequate to house the development's population during a tornado.
6. The applicant must be current on property taxes on all existing properties owned, if applicable ("current on property taxes" includes being in compliance with a payment plan or stipulated agreement with the taxing entity);
7. The applicant will be required to propose the financial structure, which, at a minimum shall meet all of the following criteria:
 - a. CDBG-DR Program funds are utilized as gap financing in the form of subordinate debt, which may be secured with a mortgage;
 - b. CDBG-DR Program funds are limited to the hard and soft costs of mitigation and rehabilitation or new construction;
 - c. The applicant must propose a financial structure that leverages CDBG-DR Program funds by:
 - i. Utilizing four percent or nine percent low income housing tax credits; or
 - ii. Utilizing other forms of financing or equity except deferred development fees;
 - d. The applicant must define an acceptable timeline for development of the property to the specifications provided by the City in the RFP.
8. All properties assisted with CDBG-DR Program funds shall be encumbered with a lien for a period to be determined by the City based on its underwriting of the project;
9. The property and the applicant must meet all of the federal, State and local requirements of eligibility and underwriting for CDBG-DR Program funding and all other applicable federal requirements; and
10. No portion of the Funding may be used to reimburse the applicant for costs incurred prior to its application;

HUD-assisted Housing, McKinney-Vento funded shelters, other HUD Properties

There are no Public Housing Authorities within Moore’s City limits. There are 571 HUD subsidized units, none of which have an unmet need. 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. reports 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 detailed earlier in this section and described in the Citizen Participation portion of section XII, there have not been any HUD-assisted housing properties identified as having unmet needs.

As a result, the City has not reserved any of the first allocation of Funding specifically to address the rehabilitation, reconstruction or replacement of any McKinney-Vento funded shelters and housing for the homeless – including emergency shelters and transitional and permanent housing for the homeless, and private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program. The City has, however, defined funding eligibility for multifamily housing to include each of these activities. As the City continues to work on recovery efforts, and continues planning activities for future disasters, it will continue to reach out to public housing authorities, owners/operators of HUD-assisted housing, homeless service and shelter providers, as well as the owners and managers of both transitional and permanent housing for the homeless in order address any newly identified unmet needs that may arise. In addition, the City may allocate a portion of additional CDBG Program funding to address the resiliency measures for transitional and permanent housing for the homeless, in order to protect the homeless and other vulnerable populations.

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.

Infrastructure

Allocation \$30,680,672.12

The City has identified at least forty seven (47) infrastructure projects with unmet needs totaling approximately \$109.3 million.

There are a number of infrastructure projects that have the potential to affect the health, safety and welfare of the local community and are therefore urgent priorities. The allocation of the Funding for infrastructure projects will focus on unmet needs that are urgent in nature and can be immediately addressed, including, but not limited to drainage repairs; critical road repairs; and water and sewer repairs.

In December of 2017, the City completed an upgrade to its Geographic Information System (GIS) utilizing a portion of the planning allocation. This update increased the City's capacity to respond to changes in the city, its infrastructure, demographics, and emergency services. As part of this update, a new GIS server was purchased. In August of 2019, HUD determined the GIS update activity did not comply with 24 CFR 570.205 and concluded the activity was ineligible. HUD accepted a repayment plan for the CDBG-DR funds in May of 2020. The repayment plan consists of four payments that were made during a two year time period totaling \$589,350. These funds were reallocated to the infrastructure program.

Infrastructure Goals

The primary goal of Moore's CDBG-DR disaster recovery program with regard to infrastructure is to restore a suitable living environment in disaster impacted areas by rehabilitating or reconstructing infrastructure. The City also intends to make infrastructure repairs in a manner that supports energy conservation/efficiency objectives and responsible growth as well as transit-oriented development.

Infrastructure Program

As previously noted, it is not expected that this amount is sufficient to address a large portion of the City's unmet infrastructure needs. HUD has indicated that future CDBG-DR funding will be intended primarily for unmet infrastructure, public facility, and mitigation "only" needs. The City will more fully address its infrastructure needs when such future funds are allocated.

Consistent with CDBG-DR Program requirements, the City's use of a portion of the Funding for this program will be consistent with the following:

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each project must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and related guidance;
- Impacted and Distressed Area – each project must be located in the city limits of Moore;
- Readiness to Proceed – each project must be capable of being undertaken (design or construction) immediately to provide outcomes to intended beneficiaries effected by the disaster;
- Feasibility – each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of the City; and
- Consistency with Consolidated Plan/Action Plan – each project must be reflective of the goals, priorities and requirements of the City's 2010-2015 Consolidated Plan.

Funding Priorities

- Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that address conditions that threaten the health and safety of either the occupants or the public; and
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area.

Construction / Reconstruction of Streets and Drainage Systems

Infrastructure activities will include the construction or reconstruction of streets and drainage systems. The City's needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Necessary repairs are estimated to cost approximately \$6.9 million. Their

repair is second only to roads which are estimated to cost \$6.7 million. Anticipated uses of funds in this activity area are expected to include a focus on road and drainage improvements.

A portion of the infrastructure funds will be utilized to make drainage and infrastructure improvements to the area around the Plaza Towers Elementary School.

Public Facilities

Allocation: \$1,455,280.08

The City has identified at least five Public Facilities projects with unmet needs totaling approximately \$31.5 million. The unmet need in Public Facilities is predominately parks and recreation. The City has decided to fund the reconstruction of Little River Park with CDBG-DR funding.

Economic Revitalization

Allocation: \$0

While over 200 businesses were affected by the tornado in Moore, the vast majority had insurance and are being rebuilt. Given the amount of the CDBG-DR allocation and the high level of insured commercial losses, the City has opted not to allocate funds in this category. If during implementation of the CDBG-DR program the City determines a need for a specific economic revitalization strategy, the City will amend this Action Plan

Mitigation & Resiliency

Allocation: \$0.00

Resilience Goals

The City's primary goal through resiliency programs and projects is to reduce the potential for loss of life in a future tornado or storm.

ShelterMoore - Moore Residential Storm Shelter Program

The City has established, funded, and begun implementation of a safe room rebate program utilizing \$3.75 million in funds collected by the American Red Cross on behalf of the City's residents, Hazard Mitigation

Funds, and other funds. As the ShelterMoore program unfolds the City will evaluate the response and determine whether a safe room or shelter program utilizing CDBG-DR will be needed.

On January 20, 2014, the City began soliciting applicants for the ShelterMoore program. For those selected and approved, the program will provide a one-time rebate of up to \$2,500 after the applicant contracts for, installs, and has city inspector approval of a storm shelter which meets or exceeds the requirements established in FEMA Publication 361¹⁸.

The ShelterMoore program is projected to provide over \$3.75 million in rebates to residents of Moore who install safe rooms or storm shelters. Current estimates indicate over 1,450 Moore residents could benefit from the rebate program. In addition, the \$2,500 rebate will permit households who utilized FEMA's Hazard Mitigation Grant ("HMG") program to install either safe rooms or storm shelters at a minimal cost to the household. In some cases, HMG will pay 75% of the cost while the ShelterMoore program will reimburse the family for the required 25% match.

To facilitate quick implementation of the ShelterMoore program, the City has partnered with the State Office of Emergency Management which will provide intake and qualification for the program.

Eligibility Threshold Requirements

- Fundable – There must be funds available to provide the rebate;
- Eligible – To be eligible, a person must be the homeowner and resident of a single-family residence located within the city limits of the City of Moore;
- Primary Residence - The residence where the storm shelter is installed must be the primary residence of the homeowner; and
- Meets or Exceeds FEMA Standard – the storm shelters meets or exceed the requirements established in FEMA Publication 361 as determined by a City inspector.

¹⁸ Residential Storm Shelter Program, City of Moore; Jan 20, 2014

Funding Priorities

- Homeowners whose primary residences were destroyed or received significant damage in the May 20th, 2013 tornado and the May 31st storm will receive first priority for selection.
 - Significant damage will be determined based on the necessity of obtaining a building permit from the City. If a building permit was obtained for building a home to replace one destroyed on May 20th, or a building permit was obtained for rebuilding/remodeling of a home damaged on May 20th or May 31st, those residences will be given priority for a storm shelter rebate.
- All other residences will have second priority.

Planning

Allocation: \$1,353,560.35

To facilitate long-term recovery, the City will utilize planning funds for six critical areas:

1. A Capital Improvements Plan for the tornado impacted area. 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);
2. 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 receiving “minor” damage or less (“affected”) from future tornado events;
3. A Comprehensive Plan update and replacement of the Moore Vision 20/20 Plan completed in 2006. The plan will provide guidance to government staff, elected and appointed officials, businesses, civic organizations and its citizens on how to address existing issues and position the city for future recovery and successes.
4. A Comprehensive Stormwater Management and Master Drainage Plan will give the city several beneficial tools for analyzing and managing future development and existing infrastructure.
5. A master plan for the redevelopment of a parcel as a multifamily, mixed use property; and

6. Software and training of staff that will assist the City in meeting Federal requirements and engage in long term planning.

In addition, a significant and necessary investment has been made in preparation for the receipt and distribution of the Funding. Accordingly, the City will utilize a portion of these Planning funds to offset the costs incurred to develop the proposed programs and activities through which the Funding will be administered. The City may expend approximately \$25,000 for such costs.

In December of 2017, the City completed an upgrade to its Geographic Information System (GIS) utilizing a portion of the planning allocation. This update increased the City's capacity to respond to changes in the city, its infrastructure, demographics, and emergency services. As part of this update, a new GIS server was purchased. In August of 2019, HUD determined the GIS update activity did not comply with 24 CFR 570.205 and concluded the activity was ineligible. HUD accepted a repayment plan for the CDBG-DR funds in May of 2020. The repayment plan consists of four payments that were made during a two year time period totaling \$589,350. These funds were reallocated to the infrastructure program.

Administration

Allocation: \$2,610,000

In order to effectively administer the Funding consistent with these federal requirements, and to ensure that the necessary safe guards are provided, and monitoring processes and procedures are established and followed, the City intends to utilize the full allotment of administrative funds allowed under the Federal Register Notice.

VI. Federal, State, Local, Non-profit, and Individual Sources of Funding to be Leveraged

Moore has identified the following preliminary list of sources of leverage for the Funding:

MULTIFAMILY HOUSING		
Program	Explanation	Amount
LIHTC – 4%	Non-competitive open application period with award based on viability of the project	Unlimited
LIHTC – 9%	Competitive allocation of credits	TBD
OHFA – HOME	May be available in conjunction with 4% or 9% tax credit financing	TBD
FEMA	Hazard Mitigation Grant Program	TBD
City of Moore Contributions	The City of Moore will make contributions to LMI multifamily projects through the expenditure of local general funds.	TBD

SINGLE FAMILY HOUSING		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
Local Area Recovery Committee	Single Family Housing	(up to \$4 million)

INFRASTRUCTURE		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
City of Moore Contributions	The City of Moore will make contributions to infrastructure projects through the expenditure of local general funds.	TBD

PUBLIC FACILITIES		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD

Coca Cola Foundation	Rebuilding of Memorial Park	\$100,000
Devon Energy	Pavilions for Little River Park	\$300,000
Oklahoma City Community Foundation	Installation of restrooms/fitness area	\$140,000
City of Moore Contributions	The City of Moore will make contributions to public facilities projects through the expenditure of local general funds.	TBD

COMMERCIAL REVITALIZATION		
Program	Explanation	Amount
(NONE)		\$0

MITIGATION AND RESILIENCY		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
American Red Cross Fund	Safe Rooms/Shelters	\$3.75 million

In all, the City has identified at least eight (8) forms of leverage to increase the impact of the Funding. Of the potential sources of leverage, the Multi-family Housing (New Construction) program will have the highest leverage. Leverage in the owner occupied rehabilitation program will vary greatly by the applicant and will be dependent on a number of factors which cannot reasonably be quantified at this time, such as the availability of private insurance and National Flood Insurance Program paid claims payments, and foundation and/or other philanthropic awards. Mitigation leverage will be heavily dependent on the ability of the City to identify all applicable properties prior to the required FEMA deadlines for property registration. Infrastructure and Resiliency measures are expected to have lower leverage ratios.

VII. CDBG-DR Program Allocations

MOORE CDBG-DR PROGRAM ALLOCATIONS	
Activity	Allocation
Housing	\$16,100,489.45
Infrastructure	\$30,680,670.12
Public Facilities	\$ 1,455,280.08
Economic Revitalization	
Mitigation/Resiliency	
Administration	\$2,610,000.00
Planning	\$1,353,267.86
TOTAL	\$52,200,000.00

Consistent with the Federal Register Notices, the primary purpose of the Funding is to address the immediate unmet housing and economic revitalization needs of our City. The City’s allocation of the Funding by activity (as set forth in the table above) is guided by several critical federal requirements set forth in the Federal Register Notice.

- First, the Federal Register Notice requires that all funding must be used to provide assistance in the City of Moore.
- Second, all activities, with the exception of Administration and Planning, must meet at least one of the National Objectives.
- Third, at least 42% of the funding must meet the Low/Moderate Income Benefit National Objective granted by a HUD granted waiver on September 9 2017. As a result, the City must be able to demonstrate that the Funding is being expended to assist LMI persons.
- Fourth, while homeownership assistance may be provided to households up to 120% of AMI, only those funds used to serve households with up to 80% of AMI may qualify as meeting the low- and moderate-income person benefit national objective.
- Finally, the Funding cannot be used to assist second homes (as defined in IRS Publication 936) or private utilities.

The City's first priority with the CDBG-DR grant is to assist as many affected residents as possible in repairing their homes so they can get their lives back in order and restore the local economy. With this priority in mind, the City will consider additional factors to determine allocations of the Funding.

The City's estimate of the unmet needs at the time activities are implemented will also influence funding decisions. Current estimates are based on the City's review of data from FEMA, SBA, the Oklahoma Insurance Department and local codes enforcement data. The estimate of unmet is necessarily preliminary. City officials continue to receive and evaluate new or revised data pertaining to unmet needs and the availability of funding from private insurance, FEMA, SBA and other sources. The City's estimate of the both the number of homes and businesses affected by the tornado as well as the magnitude of unmet needs will continue to be refined. The focus of this Action Plan -- single family and multifamily homes, planning, and urgent infrastructure needs -- is based on that current assessment of unmet needs.

Planning

HUD guidelines allow the City to opt to expend up to 15% of its CDBG-DR Program funding allocation on planning activities. The City intends to expend \$1,353,267.86 in planning activities to assist in the planning processes associated with the redevelopment of tornado impacted areas.

In addition, consistent with CDBG Program regulations, the City intends to expend a portion of the Planning Funding on costs incurred in the course of developing the CDBG-DR programs and activities.

Planning Goals

In September 2013 the City procured a comprehensive housing market analysis of the City which was completed in December 2013. The analysis provided Moore with both a snapshot of the existing market and a projection of market trends for the City for the next ten years.

- The City will use a portion of Planning Funding to develop a Capital Improvements Plan for the tornado impacted area. 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);
- The City will use a portion of Planning Funding to develop master plan for the development of a parcel as a multifamily property;

- 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; and
- A Comprehensive Stormwater Management and Master Drainage Plan will give the city several beneficial tools for analyzing and managing future development and existing infrastructure.

In December of 2017, the City completed an upgrade to its Geographic Information System (GIS) utilizing a portion of the planning allocation. This update increased the City’s capacity to respond to changes in the city, its infrastructure, demographics, and emergency services. As part of this update, a new GIS server was purchased. In August of 2019, HUD determined the GIS update activity did not comply with 24 CFR 570.205 and concluded the activity was ineligible. HUD accepted a repayment plan for the CDBG-DR funds in May of 2020. The repayment plan consists of four payments that were made during a two year time period totaling \$589,350. These funds were reallocated to the infrastructure program.

Administration

The City will act as the lead agency for the administration of the Funding. The City will administer and directly disburse the Funding directly to benefit homeowners, multifamily property owners, and other eligible beneficiaries of the Funding. Administration of the Funding by the City will ensure that program activities reach affected residents in a consistent and coordinated manner. The City will implement the programs and activities detailed in this Action Plan primarily through dedicated staff, consultants, and third-party contractors.

The City intends to create additional staff positions shown on the organizational chart below resulting in 3.0 full-time equivalents. These include:

- Compliance Specialist
- Accountant
- Administrative Assistant for CDBG-DR.

Consultants will also be hired to provide additional administrative services, possibly to include those related to compliance and monitoring.

Third-party contractors will be retained by the City as necessary under certain activity categories (i.e., Infrastructure, Public Facilities, Planning and Administration) and will include, but not be limited to:

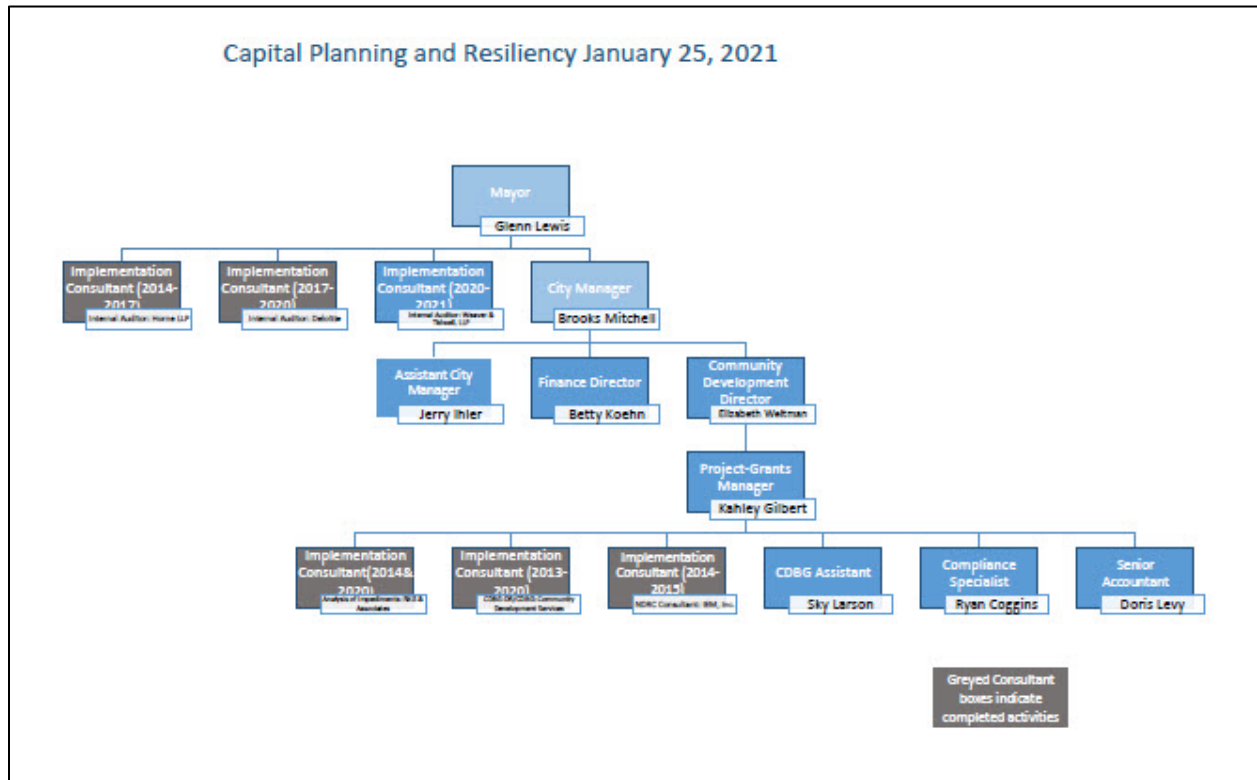
- Environmental Review services (including historic preservation review);
- Architectural and Engineering services;
- Legal services;
- Internal auditing services;
- Construction management services; and
- General contracting (including subcontracting).

City staff dedicated to the administration of the Funding will be responsible for complying with the significant federal requirements related to financial management and control, programmatic compliance and monitoring, affirmative fair housing, the prevention of fraud, waste and abuse. These staff members will be responsible for administering all aspects of the City's CDBG-DR Program, including oversight of all contractors, working with individual applicants, processing the necessary payments, tracking projects and program activities, reporting in the federal Disaster Recovery Grants Administration (DRGR) system, as well as coordinating the activities of other agencies in relation to the tornado recovery. All administrative processes will be managed in a manner consistent with the Certifications offered by the City of Moore prior to submission of this Action Plan.

As indicated above, the City will also procure an Internal Auditor for CDBG-DR programs, who will report directly to the Mayor. The Internal Auditor for CDBG-DR programs is responsible for ensuring that procedures to detect fraud, waste, and abuse are both adopted and implemented in accordance with federal requirements and consistent with the Statement on Auditing Standards No. 99 (SAS99) and the standards established for the International Standards for the Professional Practice of Internal Auditing as promulgated by the Institute of Internal Auditors (IIA).

The City staff will also oversee the extensive federal requirements associated with programmatic compliance and monitoring. Staff members will be responsible for ensuring the overall administration of the Funding complies with all applicable federal requirements. They will monitor other City staff to ensure the proper implementation of consistent processes and procedures, particularly as they relate to the identification and prevention of the duplication of benefits. This compliance team will also be responsible for monitoring all the City's contractors and service providers as detailed in the CDBG-DR Compliance and Monitoring Manual, attached as Appendix C to this Action Plan. As

previously noted, there will also be long term compliance requirements associated with some of these program activities (i.e. liens on homeowner and multifamily properties for extended periods). Due to the scope and complexity necessary to meet these federal obligations, the City intends to use the full amount HUD allows the State to allocate for administration of the Funding (i.e. 5% of the grant).



Long-Term Recovery Planning

The City has already procured a Comprehensive Housing Market Analysis (“CMHA”) designed to assist the City in long term recovery planning. The CMHA has provided valuable information to the City regarding housing and economic growth rates as well as the demand for safe rooms. Highlights of the CMHA include:

Short to Mid-Term Housing Demand

The findings and conclusions of the housing and affordability analysis are summarized below:

- Housing absorption in Moore has average approximately 500 units per year for the past twelve years, but has slowed to about 270 units per year the last two years.

- Sales activity since 2010 shows the most activity in the \$100,000 to \$250,000 range, with sales almost evenly split between the \$100,000-\$150,000 range at 1,213 units and the \$150,000-\$250,000 range at 1,138 units.
- Residential projects in the pipeline include 721 new single family detached units.

Conclusion: New single family detached homes are moving up in price closer to the \$250,000 to \$300,000 range, as buyers are demanding more living space and amenities such as 3-car garages, safe rooms, and quality finishes and fixtures. The full purchasing power of homeowners in Moore has not been realized, as evidenced by the preponderance of housing in the lower affordability thresholds.

- Renter occupied homes comprise 26% of the stock, compared to 31% in the county, 32% in the state, and 34% in the nation.
- Apartment vacancies in the larger and newer complexes are were consistently less than 5% before the tornado, according to property managers surveyed.
- Residential development projects in the pipeline include 721 apartment units and 110 duplexes. A 150-unit apartment complex is being considered for a parcel on the west side of S. Eastern Avenue at S.E. 8th Street, but has met public opposition.

Conclusion: Local developers are responding to pent up demand as the new apartment complexes proposed are the first since 2006, when a 60-unit complex was built in Old Town. Based on information from local realtors and property managers, much of the apartment demand is being generated from young workers who were raised in and want to remain in Moore, but do not have the resources or desire to buy, and desire the amenities and convenience of modern apartment living. Developers with apartments in the pipeline anticipate rents ranging from \$700 to \$1,100 a month.

Impact of Tornado Frequency on Housing Market

Moore experienced tornados in 1998, 1999, 2003, 2010, and most recently, May 2013. Since 2000, the population has grown by 14,692, or 26%, and over 7,200 dwelling units have been built. The highest number of units built in that period was 904 in 2004, the year following a tornado. In the six months

since the most recent event, 342 permits have been issued for rebuilds, representing over 30% of the units destroyed. Most are expected to rebuild as insurance claims are settled.

Stakeholders interviewed were specifically asked if the frequency of tornadoes in Moore would have an impact on future growth. All stakeholders interviewed saw no immediate or long term impact. Post tornado permitting supports the stakeholders, as over 210 building permits have been pulled for reconstruction of destroyed properties and a similar number have been pulled for new construction on lots within the City. The pace of rebuilding can be partially attributed to the boom in horizontal drilling in the area.

The most recent event has caused a surge in permits for safe rooms, however, and realtors report that new home builders are building in provisions for quick and inexpensive installation of safe rooms, if the buyer desires¹⁹.

Area Master Plan

The City proposes to procure an area master plan for an as yet undefined area with the purposed purpose of siting a multifamily development. The estimated cost of the Area Master Plan is \$125,000.

Capital Improvements Plan

The City proposes to procure a capital improvements plan (CIP) to ascertain the City's need for upgrading existing infrastructure and/or building new infrastructure to meet the rebuilding and resiliency needs of the City. The estimated cost of the CIP is \$125,000.

Capacity Improvements Plan

An analysis of the capacity needs in the area of managing a rehabilitation program of the size and scope provided for in the Action Plan was completed by Training and Development Associates under contract with HUD. The evaluation indicated Oklahoma City's Housing Rehab Tracking System (HRTS) does not meet all of the requirements of a complete disaster recovery rehab program. Oklahoma City and Moore received a demonstration of Developer Pro (DP) on January 15th, 2014 and subsequently agreed to utilize an upgraded HRTS and DP in tandem to meet the necessary Federal Requirements for the housing rehabilitation program.

¹⁹ Comprehensive Housing Market Analysis; December 2013; RKG Associates; pages 7-1 to 7-3

In order to meet the Federal requirements, the City will acquire the DP software and obtain training for persons who will utilize the software. The City will also reimburse Oklahoma City for the costs to upgrade HRTS to include additional templates, checklists, and criteria for Moore's rehabilitation programs.

In addition, Moore will obtain a GIS software upgrade to assist the City in managing long term responses to the disaster. The City will leverage the GIS upgrade with general funds to upgrade hardware. The estimated cost of Capacity Building is \$50,000

VIII. Other Program Requirements

Green Building Standards

The City has adopted the HUD CPD Green Retrofit Checklist for rehabilitation and the International Energy Conservation Code 2006 ("IECC") and the Enterprise Green Communities Criteria for reconstruction and/or new construction.

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 the Enterprise Green Communities Criteria.

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.

While the standards noted above are for the bricks and mortar aspects of replacing damaged residential properties, the City will also encourage the use of green infrastructure techniques to mitigate against storm water run-off and flooding when repairing or replacing damaged infrastructure.

Compliance and Monitoring

As part of the City's ongoing responsibilities for the administration of HUD's federally funded programs, the City will conduct comprehensive monitoring reviews for all programs and activities that fall under Title H.R. 152, titled: Division A: The Disaster Relief Appropriations Act; also known as Public Law 113-2. The City is a recipient of funding for the purpose of assisting in the development and redevelopment of homes, facilities, and infrastructure lost or devastated by the tornado under the Community Development Block Grant Program - Disaster Recovery (CDBG-DR) administered by HUD.

The Funding is targeted to areas with the greatest needs based on data provided by FEMA, the State and the City. The Funding must be used in accordance with the Federal Register Notice, which provides the regulatory framework established by HUD for the CDBG-DR Program and the Funding.

To assist the City meet its compliance and monitoring obligations, the City's administration of the funding shall be subject to review by an Internal Auditor procured specifically to insure the compliance and integrity of CDBG-DR funds. The Internal Auditor will report directly to the Office of the Mayor and to City Council. The Internal Auditor will check for fraud, waste, and abuse by utilizing the applicable internal auditing standards. The Internal Auditor will apply the standards in the Statement on Auditing Standards No. 99 (SAS 99) Consideration of Fraud in a Financial Statement Audit and the standards established in the International Standards for the Professional Practice of Internal Audit as promulgated by the Institute of Internal Auditors ("IIA"). The IIA is the lead organization that sets the standards for the practicing of Internal Auditing.

Program monitoring staff and/or contractors will follow the procedures described in the CDBG-DR Compliance and Monitoring Manual (see Appendix C of this Action Plan), with a particular emphasis on the accuracy of information provided by applicants, identification of the duplication of benefits, and compliance with all applicable state and federal requirements associated with the CDBG-DR funding.

Duplication of Benefits

HUD has instituted specific reporting, written procedures, monitoring, and internal audit requirements for each grantee to ensure compliance with program rules for CDBG disaster recovery awards, including rules related to prevention of fraud, abuse, and duplication of benefits. Two authorities form the

foundation of duplication of benefit inquiries—the Stafford Act and applicable “necessary and reasonable cost principles in 24 CFR part 570 and in OMB Cost Circulars (codified in title 2 of the Code of Federal Regulations). Supplemental appropriations statutes often reinforce and supplement these authorities.

The Stafford Act. The Stafford Act directs administrators of Federal assistance to ensure that no “person, business concern or other entity” will receive duplicative assistance and imposes liability “to the extent such assistance duplicates benefits available to the person for the same purpose from another source.” 42 U.S.C. 5155(a). Specifically, section 312 of the Stafford Act prohibits any person, business concern, or other entity from receiving “any part of such loss as to which he has received financial assistance under any other program or from insurance or any other source.” 42 U.S.C. 5155(a). Duplication occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The Stafford Act requires a fact specific inquiry into assistance received by each person, household, or entity. A grantee may not make a blanket determination that a duplication of benefits does not exist for all beneficiaries or recipients under a disaster recovery program. As a result, all disaster recovery funds must be governed by policies and procedures to prevent duplication of benefits.

The City will establish a methodology for the collection of data on each resident/client receiving any portion of the Funding and will implement the following framework for determining and preventing Duplication of Benefits in its CDBG-DR Program:

- Assessment of need prior to assistance: The City will first determine the applicant’s total post disaster need in the absence of any duplicative benefits or program caps. For housing and infrastructure programs, this will be accomplished by the City’s use of its Construction Specialists or an independent qualified contractor in obtaining construction cost estimates, on all projects seeking assistance. For recovery programs not involved with physical rebuilding, such as economic development to provide an affected business with working capital, the total need may not necessarily be based on construction cost estimates. In such scenarios, the potential award will be determined by the program and be guided by standard City underwriting principles in determining cost reasonableness.

- Total assistance available to the person or entity: Assistance includes all benefits available to a funding recipient; including cash and other resources such as insurance proceeds, grants, and SBA loans (private loans not guaranteed by SBA are exceptions and will not be included in accordance with guidance from HUD). The City through its Community Development Planning staff will identify all assistance received by each person, business concern, or other entity, via insurance, FEMA, SBA, other local, state, or federal programs, and private or nonprofit charity organizations. The homeowner will be required to sign a “Consent and Release Form”. This form will allow the City to share all of the owner information and all owner non-public personal information with agencies and companies in order to process the application of CDBG-DR funds. Each form only allows the sharing of information required for completing the duplication of benefits check. In addition, each applicant for CDBG-DR funds will be required to complete an “Insurance and Other Fund Sources Affidavit”. This form will be used to collect information on assistance received by the homeowner and/or entity for the same purpose.
- The City will also identify reasonably anticipated assistance, such as future insurance claims or approved SBA loan proceeds. Reasonably anticipated funds include assistance that has been awarded, but has not yet been received. This information will be entered in the database for calculation of the CDBG-DR unmet need. To address any potential duplication, beneficiaries will be required to sign a “Subrogation and Assignment Agreement” to repay any assistance later received for the same purpose as the CDBG –DR funds. The signing of this document ensures that if the applicant receives additional funds, the applicant pays the City back enough to prevent any duplication of benefit. This also ensures that CDBG-DR funds are not being used to cover losses already covered by “any other source”. (Ref. Sec. 312. Duplication of Benefits (42 U.S.C. 5155) The City will identify a method in its administrative manual for the CDBG-DR Program to monitor compliance with the agreement for a reasonable period subsequent to close out of the project.
- **Non-duplicative assistance excluded from final benefit calculation**: Once the City has determined the potential award and the total assistance received or to be received, the following assistance will be excluded for duplication of benefit purposes: (1) assistance provided for a different purpose; (2) used for a different, eligible purpose; (3) not available to the applicant; (4) private loan not guaranteed by SBA; or (5) any other asset or line of credit available to the applicant.

- **Cost reasonableness:** Non-duplicative assistance which may be excluded from the benefit calculation shall be subject to review and underwriting by the City to the extent that loans, assets, or the refusal to accept an SBA loan results in CDBG-DR funding failing the Cost Reasonableness tests required by OMB Circular A-87. The City may deny CDBG-DR funding to any applicant who has been determined by the City not to have met Cost Reasonableness criteria or may require the applicant to provide the funds necessary to meet Cost Reasonableness criteria.

The City will take into consideration that funding for the repair, replacement, rehabilitation, or new construction of public facilities or improvements could potentially involve a duplication of benefits. The City will address on a project basis whether other sources of funds are available for that same purpose and for that specific project because funds used directly by City and other government entities for public facilities or other purposes are also subject to the duplication of benefits prohibitions under the Stafford Act.

Program Income

The City will provide grants within all components of the CDBG-DR. However, 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 that 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 Funding, such funds will become program income in the City's annual budget and the City will apply such program income to its annual budget and award the funds based on its then current method of distribution as described in the applicable Action Plan. Additionally, the City will withhold five percent of such program income to offset the City's administrative cost and any other eligible administrative expenses.

Program Income that has been derived from the CDBG-DR activities may be used only for eligible CDBG Program activities and in accordance with the provisions of Title I of the Housing and Community Development Act of 1974, as amended, 24 CFR Part 570.489(e), and the program income guidelines of the CDBG Grant Management Manual that is under development by the City. Program Income is defined as gross income received by a recipient (or sub recipient) that has been directly generated from the use of Small Cities Program funds, and includes the following:

- Payments of principal and interest (including late fees) on loans made using CDBG-DR funds. For any loan that was partially funded with CDBG-DR Program funds, program income is only the prorated portion of the income that reflects the actual percentage of CDBG-DR participation. For example, if a loan was made with 50% local funds and 50% CDBG-DR funds and a \$100 payment is received, \$50 would be CDBG-DR program income;
- Interest earned on program income pending disposition of same, but excluding interest earned on funds held in a revolving fund account;
- Net proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG-DR Program funds;
- Proceeds from the disposition of equipment purchased with CDBG-DR Program funds;
- Gross income from the use or rental of real or personal property acquired by a State, a unit of general local government; a tribe or sub recipient of a State or a sub recipient of a unit of general local government or tribe with CDBG-DR Program funds; less the costs incidental to the generation of the income (i.e. net income);
- Net income from the use or rental of real property owned by a State, a unit of general local government, or tribe or a sub recipient of a unit of general local government or State or tribe, that was constructed or improved with CDBG-DR Program funds; less the costs incidental to the generation of the income;
- Proceeds from the sale of liens made with CDBG-DR Program funds;
- Proceeds from the sale of obligations secured by liens made with CDBG-DR Program funds;
- Funds collected through special assessments made against properties owned and occupied by households not low-and moderate-income, where the special assessments are used to recover all or part of the CDBG-DR Program portion of a public improvement; and
- Gross income paid to a State, UGLG, tribe, or paid to a sub recipient thereof from the ownership interest in a for-profit entity in which the income is returned for the provision of CDBG-DR assistance.

Program Income is the amount of revenue received in a single program year which is greater than or equal to \$25,000.

Capacity Building

The City of Moore recognizes the need to establish program and staff capacity to undertake the CDBG-DR Grant Program. For administration of many aspects of the program, OneCPD Training will be utilized whenever possible for new and existing staff. Additionally, the proposed Housing Rehab Program will require significant investment to meet the logistical challenges of operating a housing rehab program in conjunction with a the City of Oklahoma City. In order to effectively coordinate the Housing Rehab Program tasks with Oklahoma City personnel, the City of Moore will upgrade their GIS, both in terms of data, and hardware and software (if needed). Additionally, the City of Moore will purchase Housing Developer Pro software in order to share electronic files and information with Oklahoma City housing inspectors.

Any hardware or other capital items purchased for use by the City of Oklahoma City will be returned to the City of Moore no later than by the completion of the CDBG-DR Housing Rehab Program.

Minority Owned, Women Owned and Section 3 (Disadvantaged) Business

The City's Affirmative Outreach and Marketing efforts are governed by the following initiatives, efforts, or programs.

Policy: Contracting with Small and Minority Businesses, Women Business Enterprise and Labor Surplus Firms

It is national policy to award a fair share of contracts to small, women and minority business firms. Accordingly, affirmative steps must be taken to assure that small and minority/women businesses are utilized when possible as sources of supplies, equipment, construction, and services. Affirmative steps shall include the following:

1. Including qualified small and minority/women businesses on solicitation lists.
2. Assuring that small and minority/women businesses are solicited whenever there are potential sources.

3. When economically feasible, dividing total requirements into smaller tasks or quantities so as to permit maximum small and minority/women business participation.
4. Using the services and assistance of the Small Business Administration, the Office of Minority Business Enterprise of the Department of Commerce and the Community Services Administration as required.
5. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises.
6. If any subcontracts are to be let, requiring the prime contractor to take affirmative steps in 1 through 5 above.
7. Grantees shall take similar appropriate affirmative action in support of women's business enterprises.
8. Grantees are encouraged to procure goods and services from labor surplus areas.
9. Grantor agencies may impose additional regulations and requirements in the foregoing areas only to the extent specifically mandated by statute or presidential direction.

Definitions

Minority Business Enterprise – A Minority Business Enterprise is a business in which minority group members own 51 percent or more of the company; or, in the case of a publicly-owned business, one in which minority group members own at least 51% of its voting stock and control management and daily business operations. For this purpose, minority group members are those groups of U.S. citizens found to be disadvantaged by the Small Business Administration pursuant to [Section 8\(d\) of the Small Business Act](#). Such groups include, but are not limited to, Black Americans, Hispanic Americans, Native Americans, Indian tribes, Asian Pacific Americans, Native Hawaiian Organizations, and other minorities.

Women Business Enterprise - A Women Business Enterprise is a small business that is at least 51% owned by one or more women. In the case of publicly owned businesses, at least 51% of the stock is owned by one or more women and the management and daily operations of the business are controlled by one or more women.

Small Business - A business that is independently owned and operated and which is not dominant in its field of operation and in conformity with specific industry criteria defined by the Small Business Administration (SBA)

Small Disadvantaged Business - A Small Disadvantaged Business is a small business that is at least 51% owned and controlled by a socially and economically disadvantaged individual or individuals. Small Disadvantaged Businesses are often referred to as Section 3 businesses.

Racial and Ethnic Groups - The following are HUD defined recognized and ethnic categories:

- *White, Not Hispanic Origin* - A person having origins in any of the original peoples of Europe, North Africa, or the Middle East, but not of Hispanic origin.
- *Black, Not Hispanic Origin* - A person having origins in any of the black racial groups of Africa, but not of Hispanic origin.
- *Hispanic* - A person of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.
- *Asian and Pacific Islander* - A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.
- *American Indian or Alaskan Native Origin* - A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal.

Citizen Participation

In 2010, the City of Moore prepared and adopted a Citizen Participation Plan 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

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 14-day advance notice publication and notice postings of public hearings
- Non-English Speaking Residents: provides for accommodation of non-English speaking residents
- 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 Action Plan (even though HUD requires only one public hearing under the Federal Notice referenced above). The first public hearing, held on January 8, 2014, identified community needs; whereas, the second public hearing, held on March 5, 2014, 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 February 24, 2014, the Draft CDBG-DR Action Plan was published for public comment. The seven (7) day comment period ended on March 5, 2014. Additional public comments were accepted at the 2nd public hearing held on that date. The proposed CDBG-DR Action Plan was presented to the City Council and approved on March 17, 2014. City Council Persons, the Mayor, City Manager, and City staff attended.

A chronology of public hearings conducted as part of the CDBG-DR Action Plan is as follows.

- **Public Hearing #1: January 8, 2014, Needs Assessment**
 - Notification published as a block ad in the non-legal section of *The Daily Oklahoman* and *Moore American* newspapers
 - Posted notice at City Hall, Public Library, and Brand Senior Center 14-days prior to the hearing
 - Posted notice to City's Website 14-days prior to public hearing
- **Public Hearing #2: March 5, 2014, Action Plan Recommendations**
 - Notification published as a block ad in the non-legal section of *The Daily Oklahoman* and *Moore American* newspapers
 - -Posted notice at City Hall, Public Library, and Brand Senior Center 14-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 as written comments. 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:

- The *Daily Oklahoman* South Metro Section and the free weekly publication *The Moore American* were used for all legal notices, including the public hearings. The notices were published in the non-legal section. Notices were published at least 14 days in advance of the meetings.
- 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.
- Mailed invitations were sent to Public Service Organizations and Agencies that serve children, elderly, disabled, homeless and persons with HIV/AIDS for the CDBG Public Service Applications invitations.

Action Plan Amendments

Substantial Amendments to the Action Plan

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.

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 State 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.

Performance Reports

The City must submit a Quarterly Performance Report (“QPR”) through HUD’s Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Within three (3) days of submission to HUD, the QPR must be posted on the City’s official Tornado page on the City website for public review and comment. The City’s first QPR is due after the first full calendar quarter after the grant award. QPR’s will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported. Each QPR will include information about the uses of funds in activities identified in the Action Plan as entered in the DRGR reporting system. This

includes, but is not limited to: project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total amount of any non-CDBG-DR Program funds to be expended on each activity; beginning and actual completion dates of completed activities; achieved performance outcomes such as number of housing units complete or number of low and moderate income persons benefiting; and the race and ethnicity of persons assisted under direct-benefit activities. The City must also record the amount of funding expended for each contractor identified in the Action Plan. Efforts made by the City to affirmatively further fair housing will also be included in the QPR.

During the term of the grant, the grantee will provide citizens, affected local governments, and other interested parties with reasonable and timely access to information and records relating to the approved program and to the grantee's use of grant funds as well as contracts procured with CDBG-DR funding. This information shall be posted on the State's official Tornado page on the City's website.

Citizen Complaint Procedures

The City will accept written citizen complaints from citizens related to the disaster recovery programs, Action Plans, Substantial Amendments, or quarterly performance reports. Written complaints should be submitted via email cdbg-dr@cityofmoore.com or be mailed to:

Grants Manager
Community Development
301 N. Broadway, Moore, OK 73160

The City will make every effort to provide a timely written response to every citizen complaint within fifteen working days of the receipt of the complaint, where practical.

The City of Moore contracts with Metropolitan Fair Housing Council of Oklahoma, Inc. for Fair Housing Administration. All citizen complaints relative to Fair Housing/ Equal Opportunity violations involving discrimination will be forwarded to the following address for disposition:

Metropolitan Fair Housing Council of Oklahoma, Inc.
1500 Northeast 4th Street, Suite 204, Oklahoma City, OK 73117

Limited English Proficiency

Requests for this Action Plan or related documents in alternate formats consistent with the provisions of federal requirements related to limited English proficiency must be directed to Jared Jakubowski of the Community Development Department.

APPENDICES

