



Action Plan

FOR STATE OF MISSOURI
COMMUNITY DEVELOPMENT BLOCK GRANT MITIGATION
(CDBG-MIT)

Missouri Department of Economic Development | Business and Community Solutions |
February 19, 2020

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Executive Summary

The CDBG-MIT funds represent a unique and significant opportunity for the State of Missouri to use this assistance in areas impacted by the 2017 disasters (DR-4317). The funds are intended for the State of Missouri to carry out strategic and high-impact activities to mitigate disasters risks and reduce future losses. While it is impossible to eliminate all risks, CDBG-MIT funds will enable the State of Missouri to mitigate against disaster risks, while at the same time allowing the State the opportunity to transform its State and local planning to align its mitigation objectives.

CDBG-MIT funds are to be used for distinctly different purposes than CDBG-DR funds. For the purpose of the CDBG-MIT Federal Register Notice (84 FR 45838), mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters. The amount of funding provided through the CDBG-MIT allocation and the nature of the programs and projects that are likely to be funded requires that CDBG-MIT grantees and their subrecipients strengthen their program management capacity, financial management, and internal controls.

The State of Missouri has been allocated \$41,592,000 in CDBG-MIT funds. The Missouri Department of Economic Development (MO-DED) has been designated by Governor Mike Parson as the responsible entity for administering the CDBG-MIT funds. The Federal Register Notice (FRN) allocating the \$41,592,000 of CDBG-MIT funds requires that all programs or projects using CDBG-MIT funds meet the definition of mitigation and that 50% (or \$20,796,000) of funding be spent in the HUD identified “most impacted and distressed (MID)” areas.

Figure 1: HUD Identified Most Impacted and Distressed Areas from 2017 Disasters (DR-4317)



Table 1: HUD MID Zip Codes and Counties under DR 4317

HUD MID Zip Codes	63935, 63965, 64850, 65616, 65775
HUD MID Counties	Carter, Douglas*, Howell, McDonald*, Newton, Reynolds*, Ripley, Taney

*Adjacent to county primarily containing MID but contains small section of MID Zip Code as well. To prevent exclusion in analysis, these counties are also considered MID Counties.

The remaining 50% of funds may be spent for activities that meet the definition of mitigation in the following eligible counties when supported by determinations based on the Risk-Based Needs Analysis.

Table 2: State MID Counties under DR-4317

State MID Counties	Barry, Barton, Bollinger, Boone, Butler, Camden, Cape Girardeau, Cedar, Christian, Cole, Crawford, Dade, Dallas, Dent, Dunklin, Franklin, Gasconade, Greene, Iron, Jasper, Jefferson, Lawrence, Madison, Maries, Miller, Mississippi, Morgan, New Madrid, Oregon, Osage, Ozark, Pemiscot, Perry, Phelps, Pike, Pulaski, Ralls, Scott, Shannon, St. Louis, Ste. Genevieve, Stone, Texas, Wayne, Webster, Wright
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To align with the requirements in the Federal Register Notice (84 FR 45840), the State of Missouri’s Department of Economic Development (DED) has developed this risk-based mitigation needs assessment to identify and analyze all significant current and future disaster risks in order to provide a substantive basis for the activities proposed in Section 5 CDBG-MIT Program Design .

The Risk-Based Needs Assessment:

1. Provides an overview of Missouri’s geographic landscape.
2. Summarizes climate trends and projections that may contribute to current and future risks.
3. Discusses historic damage patterns that have impacted the State of Missouri.
4. Identifies all considered resources including the FEMA approved State Hazard Mitigation Plan (SHMP) and local Hazard Mitigation Plans (HMP).
5. Assesses current and future risk to critical service areas or community lifelines.
6. Assesses risk to vulnerable populations and LMI.
7. Addresses unmet mitigation needs in response to identified current and future risks.

The State consulted with the State Emergency Management Agency (SEMA), regional planning commissions, the private sector, and other governmental agencies to provide a multi-hazard risk-based mitigation needs assessment for the HUD and Missouri State Most Impacted and Distressed (MID) Areas. This analysis of a broad range of data sources

was key in development of a comprehensive assessment of the hazards discussed here, which pose substantial risk of loss of life, injury, damage and loss of property, along with suffering and hardship.

The data suggests that based on total number of high-ranking hazards in each of Missouri’s county local hazard mitigation plans, the top risks impacting the state in order are:

1. Thunderstorms
2. Tornadoes
3. Flooding (riverine and flash)
4. Severe winter weather

For this reason, the State of Missouri has identified the above hazards as the state’s greatest risks, which are discussed in Section 4.5 State Greatest Risk Profile.

The State of Missouri used the results of the risk assessment to inform program design for the CDBG-MIT funds with the objective of ensuring proposed activities meet the definition of mitigation, address a current or future identified hazard, and comply with HUD’s CDBG eligibility criteria and national objectives.

Table 3: State of Missouri’s Proposed CDBG-MIT Programs and Budgets

Program	Allocation	% Total Funds	HUD MIDs	State MIDs	Max Award	Eligible Applicants
Infrastructure	\$33,273,600	80%	\$16,636,800	\$16,636,600		
General Infrastructure	\$13,309,440	32%	\$ 6,654,720	\$ 6,654,720	\$2.5M	Units of Local Government
Public Facility Hardening	\$13,309,440	32%	\$ 6,654,720	\$ 6,654,720	\$5M	Units of Local Government
Generators for Critical Facilities	\$ 3,327,360	8%	\$ 1,663,680	\$ 1,663,660	\$50K	Units of Local Government
Warning Systems	\$ 3,327,360	8%	\$ 1,663,680	\$ 1,663,660	\$50K	Units of Local Government
Planning and Capacity Grants	\$ 6,238,800	15%	\$ 3,119,400	\$ 3,119,400		
Mitigation Planning	\$ 3,119,400	7.5%	\$ 1,559,700	\$1,559,700	\$150K	Units of Local Government and COGs
Capacity Grants	\$ 1,934,028	4.6%	\$ 967,014	\$ 967,014	\$200K	Units of Local Government and COGs

Program	Allocation	% Total Funds	HUD MIDs	State MIDs	Max Award	Eligible Applicants
NFIP Coordinator	\$ 249,552	.6%	NA	NA	NA	NA
DED Planning	\$935,820	2.3%	NA	NA	NA	NA
DED Administration	\$2,079,600	5%	NA	NA	NA	NA
	41,592,000	100%	\$19,163,514	\$19,163,514		

The State of Missouri put great effort into determining meaningful mitigation activities that would insure the \$41,492,000 of funds could garner the most impact to both the HUD and State MID communities. After determining reasonable project maximum awards in each activity, the State should at a minimum be able to complete 170 separate mitigation activities! Below are the assumptions based on applicants receiving the maximum award.

General Infrastructure Program

- Total Program Funds: \$13,309,440
- Total Funds for HUD MIDs: \$ 6,654,720
- Total Funds for State MIDs: \$6,654,720
- Maximum Award per Project: \$2,500,000
- Total Estimated Projects: 6 (3 per each MID region)

Public Facility Hardening Program

- Total Program Funds: \$13,308,440
- Total Funds for HUD MIDs: \$6,654,720
- Total Funds for State MIDs: \$6,654,720
- Maximum Award per Project: \$5,000,000
- Total Estimated Projects: 2 (at least 1 in each MID region)

Critical Facility Generators Program

- Total Program Funds: \$3,327,360
- Total Funds for HUD MIDs: \$1,663,680
- Total Fund for State MIDs: \$1,663,680
- Maximum Award per Project: \$50,000
- Total Estimated Projects: 66 (at least 33 projects in each MID region)

Warning Systems Program

- Total Program Funds: \$3,327,360
- Total Funds for HUD MIDs: \$1,663,680
- Total Fund for State MIDs: \$1,663,680
- Maximum Award per Project: \$50,000
- Total Estimated Projects: 66 (at least 33 projects in each MID region)

Mitigation Planning

- Total Program Funds for Mitigation Planning: \$3,119,400
- Total Funds for HUD MIDs: \$1,559,700
- Total Funds for State MIDs: \$1,559,700
- Maximum Award per Project: \$150
- Total Estimated Projects: 20 (10 projects in each MID region)

Capacity Grants

- Total Program Funds for Capacity Grants: \$ 1,934,028
- Total Funds for HUD MIDs: \$967,014
- Total Funds for State MIDs: \$967,014
- Maximum Award per Project: \$200,000
- Total Estimated Projects: 10 (5 staff in each MID region)

Public Engagement

Prior to the publication of this draft Action Plan, the MO-DED conducted 5 informational and public engagement meetings to hear from the most impacted and distressed areas based on HUD's determination. The following hearings were held the week of January 28-31, 2020.

Van Buren City Hall, Tuesday, 01/28/2020

Registration & Interactive Workshop: 10:00am

Presentation & Comments: 11:00am

Doniphan Community Center, Tuesday, 01/28/2020

Registration & Interactive Workshop: 6:00pm

Presentation & Comments: 7:00pm

West Plains Civic Center, Wednesday, 01/29/2020

Registration & Interactive Workshop: 6:00pm

Presentation & Comments: 7:00pm

Branson City Hall Council Chambers, Thursday, 01/30/2020

Registration & Interactive Workshop: 6:00pm

Presentation & Comments: 7:00pm

Neosho Civic Center, Friday, 01/31/2020

Registration & Interactive Workshop: 10:00am

Presentation & Comments: 11:00am

1. Definitions, Acronyms & Abbreviations

100-YEAR FLOOD PLAIN—the geographical area defined by FEMA as having a 1% chance of being inundated by a flooding event in any given year.

500-YEAR FLOOD PLAIN—the geographical area defined by FEMA as having a 2% chance of being inundated by a flooding event in any given year.

STATE CDBG—Annual allocation of Community Development Block Grant funds from Department of Housing and Urban Development (HUD)

CDBG-DR—Community Development Block Grant - Disaster Recovery (CDBG-DR) funds are issued through Federal Register Notice from Department of Housing and Urban Development (HUD) for long-term recovery of specific disaster events.

CDBG-MIT—Community Development Block Grant - Mitigation (CDBG-MIT) funds are issued through Federal Register Notice from Department of Housing and Urban Development (HUD) for mitigation projects based on determination of a risk-based needs assessment.

DOB—Duplication of Benefits is any assistance provided to subrecipients for the same purpose (i.e., for repair, replacement or reconstruction) as any previous financial or in-kind assistance already provided for the same. This prohibition comes from the Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act) and therefore, these duplicated sources of funds must be deducted from any potential award.

FEMA—Federal Emergency Management Agency that provides immediate response to disasters and issues Individual Assistance, Public Assistance, and hazard mitigation assistance

HMGP—Hazard Mitigation Grant Program provides FEMA funds for projects that mitigate against impacts from future disasters.

HUD - Department of Housing and Urban Development (HUD) is Lead Federal agency for CDBG, CDBG-DR, and CDBG-MIT

HUD MIDs—Most Impacted and Distressed areas as determined by HUD in the CDBG-MIT Federal Register notice (84 FR 45838, 8/30/19).

LMA - Low-to-Moderate Area Benefit describes activities where the area served includes 51% or more LMI households.

LMI—Low-to-Moderate Income is an income of less than 80% of the local area median income.

LMH—Low-to-Moderate Income Household is a household with an income of less than 80% of the local area median income (AMI).

LOCAL HMP - is the Hazard Mitigation Plan for the local community.

MACOG – The Missouri Association of Councils of Governments (MACOG) is the statewide organization representing Missouri’s 19 regional planning commissions and councils of governments.

MITIGATION ACTIVITY – As defined by HUD in the CDBG-MIT Federal Register notice (84 FR 45838, 8/30/19) mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

MHDC – Missouri Housing Development Commission administers the federal and Missouri Low-Income Housing Tax Credit (LIHTC) programs, the Affordable Housing Assistance Program Tax Credit (AHAP), federal HOME funds, and the direct funding of several housing assistance programs. Further, the Commission administers homeless assistance funds for permanent housing in an effort to end homelessness in Missouri. The Commission also provides advisory, consultative, training and educational services to non-profit housing organizations

MO-DED – State of Missouri Department of Economic Development is the Lead state agency for the State of Missouri’s HUD grants.

NFIP—National Flood Insurance Program.

SHMP—State Hazard Mitigation Program

STATE MIDS – Most Impacted and Distressed areas as determined by the State of Missouri based on the Presidentially Declared counties in DR-4317.

SUBRECIPIENT— a city or a county or other eligible applicant that has applied for and been awarded a grant by the Missouri Department of Economic Development (MO-DED).

2. Appropriations Act and Funding Authority

The U.S. Department of Housing and Urban Development (HUD) published its Federal Register notice for allocation of \$41,592,000 in Community Development Block Grant Mitigation (CDBG-MIT) funds to the State of Missouri for qualifying 2017 disasters (DR-4317) on August 30, 2019 (84 FR 45838).

Figure 2: FEMA DR-4317 Disaster Declaration

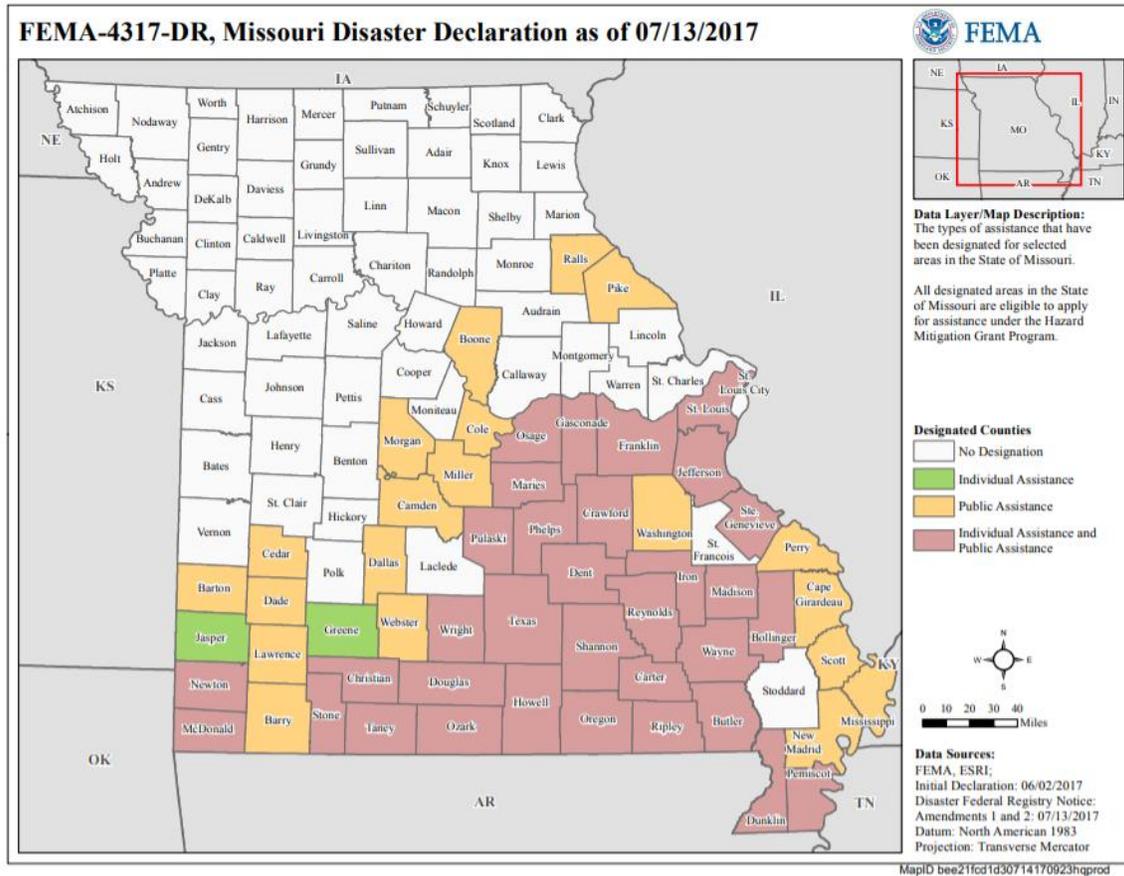


Image from FEMA <https://www.fema.gov/disaster/4317>

These funds were allocated by Congress through its allocation of \$6.875 billion in funding made available by the Further Additional Supplemental Appropriations for Disaster Relief Requirements Act, 2018 (approved February 9, 2018).

The CDBG-MIT funds represent a unique and significant opportunity for the State of Missouri to use this assistance in areas impacted by the 2017 disasters. The funds are intended for the grantee to carry out strategic and high-impact activities to mitigate disasters risks and reduce future losses. While it is impossible to eliminate all risks, CDBG-MIT funds will enable the State of Missouri to mitigate against disaster risks, while at the same time allowing the State the opportunity to transform its State and local planning to align its mitigation objectives.

The guiding structure and objectives established for the CDBG-MIT funds bear similarities to other federal programs that address hazard mitigation, particularly FEMA's Hazard Mitigation Grant Program (HMGP). Through this allocation for mitigation, HUD seeks to:

- Support data-informed investments in high-impact projects that will reduce risks attributable to natural disasters, with particular focus on repetitive loss of property and critical infrastructure;
- Build the capacity of States and local governments to comprehensively analyze disaster risks and to update hazard mitigation plans through the use of data and meaningful community engagement;
- Support the adoption of policies that reflect local and regional priorities that will have long-lasting effects on community risk reduction, to include the risk reduction to community lifelines such as Safety and Security, Communications, Food, Water, Sheltering, Transportation, Health and Medical, Hazardous Material (management), and Energy (Power and Fuel);
- Adopt a forward-looking land use plan that integrates the hazard mitigation plan, latest edition of published disaster-resistant building codes and standards, vertical flood elevation protection, and policies that encourage hazard insurance for private and public facilities; and
- Maximize the impact of available funds by encouraging leverage, private-public partnerships, and coordination with other Federal programs.

2.1 DEFINITION OF MITIGATION

For the purpose of the CDBG-MIT FRN, mitigation activities are defined as those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.

2.2 HUD AND STATE MOST IMPACTED AND DISTRESSED (MID) AREAS

The State of Missouri has been allocated \$41,592,000 in CDBG-MIT funds. The Missouri Department of Economic Development (MO-DED) has been designated by Governor Mike Parson as the responsible entity for administering the CDBG-MIT funds. The Federal Register Notice (FRN) allocating the \$41,592,000 of CDBG-MIT funds requires that all programs or projects using CDBG-MIT funds meet the definition of mitigation and that 50% (or \$20,796,000) of funding be spent in the HUD identified "most impacted and distressed (MID)" areas. These areas have been identified as the following:

Figure 3: HUD Identified Most Impacted and Distressed Areas from 2017 Disasters (DR-4317)



Table 4: HUD MID Zip Codes and Counties under DR 4317

HUD MID Zip Codes	63935, 63965, 64850, 65616, 65775
HUD MID Counties	Carter, Douglas*, Howell, McDonald*, Newton, Reynolds*, Ripley, Taney

*Adjacent to county primarily containing MID but contains small section of MID Zip Code as well. To prevent exclusion in analysis, these counties are also considered MID Counties.

The remaining 50% of funds may be spent for activities that meet the definition of mitigation in the following eligible counties when supported by determinations based on the Risk-Based Needs Analysis.

Table 5: State MID Counties under DR-4317

State MID Counties	Barry, Barton, Bollinger, Boone, Butler, Camden, Cape Girardeau, Cedar, Christian, Cole, Crawford, Dade, Dallas, Dent, Dunklin, Franklin, Gasconade, Greene, Iron, Jasper, Jefferson, Lawrence, Madison, Maries, Miller, Mississippi, Morgan, New Madrid, Oregon, Osage, Ozark, Pemiscot, Perry, Phelps, Pike, Pulaski, Ralls, Scott, Shannon, St. Louis, Ste. Genevieve, Stone, Texas, Wayne, Webster, Wright
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2.3 EXPENDITURE OF FUNDS

The FRN has waived the 70% overall benefit requirement for low-to-moderate income (LMI) beneficiaries and requires that the CDBG-MIT funds have a 50% overall benefit for LMI. The State makes prioritizing the protection of LMI individuals a priority that is reflected in the proposed programs and projects described in this Action Plan.

The FRN requires that 50% of the CDBG-MIT funds be expended within six (6) years of HUD’s execution of the grant agreement and 100% of funds expended within twelve (12) years of HUD’s execution of the CDBG-MIT grant agreement with the State of Missouri.

2.4 COORDINATION AND CONSULTATION

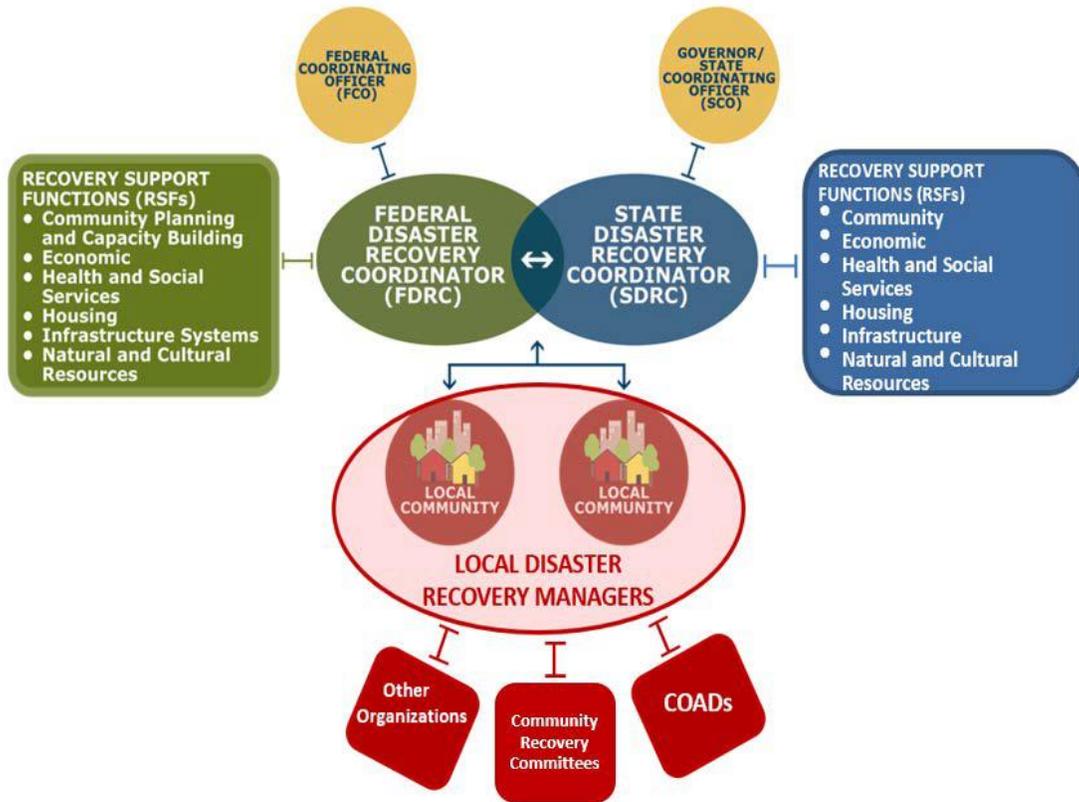
State-Wide Coordination

CDBG-MIT planning and mitigation activities require coordination across multiple regions of the State and identification of existing funding sources. MO-DED has and will leverage the State’s existing coordination structure to engage relevant stakeholders in planning and coordination process for its mitigation activities. The State of Missouri has developed its Missouri Disaster Recovery Framework (MDRF) as a guidance platform for coordination based on FEMA’s National Disaster Recovery Framework (NDRF) which incorporates recovery principles and aligns with the national coordination structure to better address gaps and needs, avoid duplication of efforts, and leverages resources during long-term recovery. The State has developed the plan for effective coordination of partners and resources to ensure continuity of services and support to meet community needs for financial, emotional, and/or physical impacts regardless of the type, size or scope of the disaster event. The State will leverage this existing framework for on-going coordination and consultation for its CDBG-MIT activities.

Coordination Structure

The MDRF mirrors the NDRF with a Recovery Coordinator and six Recovery Support Functions (RSFs). The figure below depicts Federal, State, and local coordination although the Federal counterparts are typically deployed only in larger or more catastrophic federally declared disasters where the State communicates that its recovery capabilities are overwhelmed. This coordinated approach facilitates comprehensive, sustainable, and resilient recovery in mission essential areas of impacted communities across the state.

Figure 4: Missouri Disaster Recovery Framework Coordination Structure¹



The structure identifies leadership roles, organizes whole community partners by RSF, defines roles and responsibilities, and explains the communication and coordination process. The RSF functions include:

- RSF #1 – Community Recovery Support Function: has responsibility to coordinate the development of executable strategic, operational, and/or tactical-level approaches to meet defined objectives.
- RSF #2 – Economic Recovery Support Function: has responsibility to coordinate returning economic and business activities (including food and agriculture) to a healthy state and develops new business and employment opportunities that result in an economically viable community.
- RSF #3 – Health and Social Services Recovery Support Function: has responsibility to coordinate the restoration and improvement of health and social services capabilities and networks to promote the resilience, independence, health (including behavioral health), and well-being of the whole community.

¹ Missouri Disaster Framework, v2.3, August 2019

- RSF #4 – Housing Recovery Support Function: has the responsibility to coordinate housing solutions that effectively support the needs of the whole community and contribute to its sustainability and resilience.
- RSF #5 – Infrastructure Recovery Support Function: has responsibility to coordinate the stabilization of critical infrastructure functions, minimizes health and safety threats, and efficiently restores and revitalizes systems and services to support a viable, resilient community.
- RSF #6 – Natural and Cultural Resources Recovery Support Function: has the responsibility to protect natural and cultural resources and historic properties through appropriate planning, mitigation, response, and recovery actions to preserve, conserve, rehabilitate, and restores them consistently with post-disaster community priorities, using best practices, and in compliance with applicable environmental and historic preservation laws and executive orders.

Recovery Support Function – Lead Agencies/Coordinating Agencies

The designated RSF Lead Agency serves as the State’s lead coordinator for its relevant functional area and liaisons to the State Disaster Recovery Coordinator (SDRC) and their Federal RSF counterparts. The State RSF Lead Agencies and Federal RSF Coordinating Agencies generally have similar subject matter expertise, mission elements, and/or grants in common. The State’s FSF Lead Agencies and corresponding Federal Coordinating Agencies are in Table 6 below.

Table 6: State of Missouri RSF Lead Agencies and Federal Coordinating Agencies²

State Recovery Support Functions	Federal Coordinating Agency
RSF #1 Community Missouri Dept. Of Economic Development	Community Planning and Capacity Building Federal Emergency Management Agency
RSF #2 Economic Missouri Dept. Of Economic Development	Economic U.S. Dept. Of Commerce
RSF #3 Health & Social Services Missouri Dept. Of Health and Senior Services	Health & Social Services U.S. Dept. Of Health and Human Services
RSF #4 Housing Missouri State Treasurer’s Office	Housing U.S. Dept. Of Housing & Urban Development
RSF #5 Infrastructure Missouri Dept. Of Transportation	Infrastructure Systems U.S. Army Corps of Engineers
RSF #6 Natural & Cultural Resources Missouri Dept. Of Natural Resources	Natural & Cultural Resources U. S. Dept. Of Interior

² Missouri Disaster Recovery Framework, v.2.3, August 2019

*Aligning CDBG-MIT with the Missouri Disaster Recovery Framework (MDFR)
Communication and Coordination*

The MDRF requires that a clear communication strategy be maintained on an on-going basis throughout the year when in a steady-state or non-disaster scenario. The MO-DED is active as a Lead Agency for RSFs #1 & #2 and will use these coordination opportunities to provide information regarding CDBG-MIT activities and solicit consultations from relevant RSFs regarding project impacts on their respective functional areas.

The SDRC will convene coordination meetings at least quarterly, either conference calls or face-to-face meetings. At least one meeting per year will include all RSF Partners for cross-sector networking. RSF Leads will maintain communication with RSF Partners at least quarterly and will include relevant industry or community news as well as resources and training. RSF Partners represent organizations with missions and resources directly related to their functional sector and/or conduct specific activities related to the overall RSF mission.

2.5 COORDINATION WITHIN THE HUD IDENTIFIED MOST IMPACTED AND DISTRESSED (MID) AREAS

The State of Missouri Department of Economic Development (MO-DED) has a long-standing relationship with the Missouri Association of Council of Governments (MACOG) and has for years coordinated closely with the COGs for the regular State CDBG programs and more recently the CDBG Disaster Recovery (CDBG-DR) funds. MO-DED leveraged this relationship to gain input from the COGs representing the HUD and State identified MIDs and sent out a survey to each of the following COGs to obtain additional detail regarding the impacts to the communities in their areas, identified risks, costs of the 2017 disaster, and types of mitigation activities they would like to see implemented with the CDBG-MIT funds in their areas. Results from the survey are addressed in Section 4 Risk-Based Mitigation Needs Assessment and Appendix 1.

Table 7: COGs and Counties in the HUD and State MIDs

Regional COG	Counties Represented by COG
Bootheel Regional Planning and Economic Development Commission	Dunklin
	Mississippi
	New Madrid
	Pemiscot
East-West Gateway Council of Governments	Scott
	Franklin
	Jefferson
Harry S Truman Coordinating Council	St. Louis
	McDonald (HUD MID)
	Newton (HUD MID)
	Barton
Kaysinger Basin Regional Planning Commission	Jasper
	Cedar

Regional COG	Counties Represented by COG
Lake of the Ozarks Council of Local Governments	Camden
	Miller
	Morgan
Mark Twain Council of Governments	Pike
	Ralls
Meramec Regional Planning Commission	Crawford
	Dent
	Gasconade
	Maries
	Osage
	Phelps
	Pulaski
	Washington
Mid-Missouri Regional Planning Commission	Boone
	Cole
Ozark Foothills Regional Planning Commission	Carter (HUD MID)
	Reynolds (HUD MID)
	Ripley (HUD MID)
	Butler
	Wayne
South Central Ozark Council of Governments	Douglas (HUD MID)
	Howell (HUD MID)
	Oregon
	Ozark
	Shannon
	Texas
	Wright
Southeast Missouri Regional Planning Commission	Bollinger
	Cape Girardeau
	Iron
	Madison
	Perry
	Ste Genevieve
Southwest Missouri Council of Governments	Taney (HUD MID)
	Barry
	Christian
	Dade
	Dallas
	Greene
	Lawrence
	Stone
	Webster

Coordinating with the Missouri Association of Councils of Government (MACOG) for the CDBG-MIT funding is an especially good fit as large mitigation planning and activities tend to be regional in nature. MACOG is the statewide organization representing Missouri's 19 regional planning commissions and councils of governments. These professional organizations represent the entire State of Missouri and are committed to enhancing the state's regions. Regional councils are engaged in a myriad of activities that align with areas that must be evaluated for CDBG-MIT funding activities, including:

- Economic and community development
- Housing initiatives
- Safety and security
- Transportation planning
- Environmental issues
- Quality-of-life issues

Due to the broad spectrum of functions that COGs undertake as part of their mission, coordination, planning, and implementation of CDBG-MIT activities are a natural fit guaranteeing broad stakeholder input and CDBG-MIT activity support in the affected MID areas. Most regional planning commissions deal with infrastructural issues, such as public water supply; sanitary sewage collection and treatment; and planning for various modes of transportation, including local streets and roads, highways, airports, port development, as appropriate, mass transit, and in some instances, rail. Regional planning commissions are also, from time to time, involved in park, recreational and open space planning and issues; development of various ordinances, such as subdivision regulations, zoning ordinances, mobile home park ordinances and the like; coordination of programs on behalf of county and municipal members with state and federal agencies; solid waste planning; hazardous waste planning; stormwater damage and flood control, including the National Flood Insurance Program; working for Improved educational and training facilities; manpower planning and job training issues; health and health facility's needs; and planning for compatible land usage.

Most regional planning commissions also prepare grant applications for implementation of various capital improvements and initiation of various programs. Numerous regional planning commissions also assist county and municipal government in administration of grants-in-aid. Some regional planning commissions are also involved in agricultural issues, housing development, and provision of a variety of direct services under an agreed upon basis with member units of government. A number of regional councils provide mapping and drafting services for their memberships.

The role of the regional planning commission or council of government varies in each region, depending upon the desires of the member counties and municipalities and their representatives. Nonetheless, the prime role of the regional planning commission is to provide a technical staff capable of providing sound advice to its membership and to work for coordination of various planning and infrastructural needs among the various counties

and municipalities, as appropriate. Many regional planning commissions/councils of government conduct a considerable amount of research as a matter of course in their day-to-day operations and often have a considerable amount of data and information available for use by their members and citizens of the region. A number of the regional planning commissions in Missouri serve as repositories for census data under an agreement with the Missouri State Library and its Data Affiliate Program. Most of the regional planning commissions have a small technical and planning library which also houses a wealth of data and information about their respective regions and, perhaps, a broader area.

The regional planning commissions across the State of Missouri provide an effective way for local governments to work together to address common problems and to share technical staff for problems that cross border lines or boundaries and need an areawide approach as CDBG-MIT activities generally require. They also are available to assist their member entities in coordinating the needs of the area with state and federal agencies or with private companies or other public bodies.

2.6 PRIVATE SECTOR

In December 2019, the MO-DED sent out a survey to local businesses to obtain additional detail regarding the impacts to their businesses, costs of the 2017 disaster, and types of mitigation activities they would like to see implemented in their areas. The survey was implemented via a Google Form and sent via email to potential participants.

The survey received four responses from businesses, all of which were in State MID counties.

Disaster Impact

Of the four respondents, three indicated that their business was affected by the 2017 disaster. All three cited lost accessibility to business for customers, while wind damage, flooding and water damage were also reported. Two businesses reported approximately \$100,000 in damage or lost revenue, while one business reported less than \$10,000 in damage and lost revenue. None of the three businesses reported receiving assistance from the SBA for this disaster event.

Of the three respondents who experienced impacts from the 2017 disaster, two of them selected flood mitigation as a mitigation activity that would improve their resiliency. One business selected roof reinforcement. The full analysis of the survey can be found in Appendix 2.

2.7 NATIVE AMERICAN TRIBES

The State of Missouri does not have any Federally recognized Native American Tribes within the State. The State of Missouri uses HUD's searchable directory for Tribes at <https://egis.hud.gov/TDAT> to obtain contacts for the following Tribes that do still hold

interest in Barry County which falls within the State identified eligible counties. Each of the Tribes were provided a draft of the Action Plan for their comments.

- Osage Nation
- Delaware Nation, Oklahoma
- Apache Tribe of Oklahoma
- Caddo Nation of Oklahoma
- Delaware Tribe of Indians
- Seneca-Cayuga Nation

2.8 OTHER GOVERNMENT AGENCIES (INCLUDING STATE AND LOCAL EMERGENCY MANAGEMENT)

The MO-DED coordinated with representatives of the Missouri State Emergency Management Agency (SEMA) and the Missouri Association of Councils of Governments (MACOG) via email and conference call to coordinate data sharing and to verify greatest mitigation needs. THE MO-DED also made several attempts to reach out to the USACE representative, but no response was received before the draft Action plan was completed. However, the Risk Assessment does use data from the Army Corps of Engineers, 2015 Recent US Climate Change and Hydrology Literature Applicable to US Army Corps of Engineers Missions - Upper Mississippi Region.

Additionally, MO-DED met with Missouri Housing Development Commission representative for Disaster Housing Management. The representative attended the overview of the risk assessment methodology and reviewed the determination of the four highest hazards for the State. The representative agreed with the Risk Assessment results.

2.9 CDBG-MIT ALIGNMENT WITH OTHER FEDERAL, STATE, OR LOCAL MITIGATION AND PLANNING

The MO-DED has taken the following actions to align the CDBG-MIT Action Plan with local mitigation and planning processes.

Missouri State Hazard Mitigation Plan (2018)

In writing this document, the MO-DED has drawn heavily from the Missouri State Hazard Mitigation Plan to ensure close alignment with its identified risks and recommendations. In addition to the coordination described with COGs above, the MO-DED utilized the analysis of local plans presented in the SHMP to further understand the most pressing risks in the State and HUD MID counties. The MO-DED also utilized state- and county-specific data from the SHMP to produce maps and tables presented in the Mitigation Needs Assessment section of this Action Plan.

[U.S. Army Corps of Engineers Hazard Mitigation Actions in Relation to State Hazard Mitigation Plans Kansas and Missouri, 2013](#)

Under the USACE Silver Jackets Program, the Missouri district prepared a summary document meant to enhance the state hazard mitigation plan (SHMP) on various risks discussed throughout. This document was coordinated by the Kansas City District Silver Jackets Coordinator for Kansas and Missouri. While the state utilized this plan for consideration in the 2018 State Hazard Mitigation Plan update, the summary was reviewed individually and considered as part of this action plan.

[Missouri Department of Transportation \(DOT\) Long Term Plan Update \(2018\) and Transportation Asset Management Plan \(2019\)](#)

The Missouri 2018 Long Range Transportation Plan (LRTP), A Citizen’s Guide to Missouri’s Transportation Future, “provides strategic direction to align transportation investment decisions with performance outcomes, to address transportation needs and demands amid steady population growth and declining revenues...” consistent with federal surface transportation funding programs. The LRTP and Transportation Asset Management Plan document existing conditions of the state’s multi-modal system, identify deficiencies, and set priorities for future investments. This Action Plan draws on the DOT’s assessment to support the risk assessment of future hazards.

[Missouri Disaster Recovery Framework \(2019\)](#)

The Missouri Disaster Recovery Framework (MDRF) is a collaborative effort introduced by the State of Missouri to enhance the long-term recovery capabilities of communities. Its purpose is to more quickly restore basic services to individuals and families, enable timely return to functionality, and reestablish social and economic order following a disaster.

Missouri has traditionally had a strong emergency response network. The development and implementation of a framework that focuses on the recovery portion of the disaster continuum will accomplish an efficient and well-rounded approach to the state’s disaster recovery efforts. Missouri is finalizing the state’s first MDRF Plan to codify both the statewide approach to long term recovery and also provide the detail for each of the Recovery Support Functions (RSF).

The MDRF focuses on community-wide resilience. Some examples of resilience-building activities that Missouri has already undertaken include:

- Residential and commercial buyouts
- NFIP participation
- Protective levees and berms
- Relocation of critical infrastructure
- Resilient design of roads and bridges

The most successful of those planning dollars were provided to Regional Planning Commissions (RPCs) and Councils of Government (COGs). Each could self-select from a series of planning activities designed in a manner to be replicated in other areas of the state when funding became available. Examples of planning projects included working with local governments in their regions to identify and map all the county low water bridges in the region with overlay detail which includes damage, water heights, closure information and casualties. The information is available to inform and prioritize local bridge improvements which are eligible under the CDBG-MIT Transportation Infrastructure activity.

The Missouri program will enlist FEMA Region VII Community Planning Recovery Support Function staff to support training for the communities and the plans will be modeled after the pilot plans initiated by previous planning dollars. The recovery plans will enhance existing plans by allowing further assessment of hazard risks, including construction standards, review of land use and wetland practices, and flooding.

3. Summary of Impacts Under DR-4317

The CDBG-MIT funds have been allocated to the State of Missouri to implement mitigation activities that address impacts from disasters occurring in 2017 under DR-4317. Following is an overview of the disaster impacts as they occurred in April and May 2017.

Between April 28 and May 11, 2017, the state of Missouri was struck by severe storms, tornadoes, straight-line winds, and flooding. During the weekend of April 29-30, a strong storm system brought multiple rounds of thunderstorms and heavy rain to the southern two-thirds of Missouri. Rainfall totals surpassed nine inches in some locations causing flash flooding and historic flooding along some of the tributaries of the Missouri and Mississippi Rivers. A few thunderstorms also became severe during the afternoon of April 29 with two documented tornadoes.

April 2017 became the second wettest April on record in Missouri over the past 123 years largely because of this event. A report from the US Department of the Interior listed 27 monitored rivers and creeks that reached flood stage. Ten of those reached an historic peak. Two rivers' peak record (Jacks Ford, Current River) had stood since 1904. The peak stage of the Current River at Van Buren exceeded the previous maximum stage by 8.4 ft.

By Saturday evening of that weekend, flash flooding and flooding had already led to 93 evacuations and 33 rescues conducted by local and state responders. Five deaths were reported in Missouri. After the storming and flooding ended, a total of 55 counties were declared Federal disaster areas. More than 1,200 homes were initially assessed as damaged or destroyed. Final FEMA counts would add another 700-plus homes. In addition, there were initial estimated damages of \$58 million to roads, bridges and other public infrastructure. This assessment would double in size to more than \$113M when final FEMA Project Worksheets were tallied.

This series of storms was preceded just 17 short months earlier by an almost identical severe storm, straight-line winds and flooding event. In early January of 2016, 42 counties in the southern part of the state were declared a disaster area by FEMA. Many of the same households and businesses just recovering from the 2016 flooding event were hit again by record storms in 2017. After this record flooding event, 55 counties were presidentially declared a disaster area. FEMA deployed its host of tools in the Individual Assistance and Public Assistance Programs.

3.1 SUMMARY OF IMPACTS AND PRESIDENTIALLY DECLARED COUNTIES

On May 24, 2017, Governor Eric R. Greitens requested a major disaster declaration due to severe storms, tornadoes, straight-line winds, and flooding during the period of April 28 to May 11, 2017. The Governor requested a declaration for Individual Assistance for 37 counties, Public Assistance for 46 counties, and Hazard Mitigation statewide. During the period of May 10-23, 2017, joint federal, state, and local government Preliminary Damage Assessments (PDAs) were conducted in the requested counties and are summarized below.

Table 8: Demographic Characteristics of Declared Counties

Factor	Declared Counties	Missouri	United States
POPULATION			
Population estimates, July 1, 2017, (V2017)	3,197,970	6,113,532	325,719,178
Population, percent change – 4-1-2010 to 7-1-2017	1.34%	2.10%	5.50%
AGE AND SEX			
Persons under 5 years, percent	5.92%	6.10%	6.10%
Persons 65 years and over, percent	19.23%	16.50%	15.60%
HOUSING			
Housing units, July 1, 2017, (V2017)	1,466,509	2,792,506	137,403,460
Owner-occupied housing unit rate, 2012-2016	71.09%	66.80%	63.60%
Median value of owner-occupied housing units, 2012-2016	\$103,000	\$141,200	\$184,700
Median selected monthly owner costs -with a mortgage, 2012-2016	\$947	\$1,210	\$1,491
Median selected monthly owner costs -without a mortgage, 2012-2016	\$329	\$407	\$462
Median gross rent, 2012-2016	\$600	\$759	\$949
Building permits, 2017	8,853	18,811	1,281,977
FAMILIES AND LIVING ARRANGEMENTS			
Households, 2012-2016	1,245,689	2,372,506	137,403,460
Persons per household, 2012-2016	2.52	2.48	2.64
Living in same household 1 year ago, percent of persons age 1 year+, 2012- 2016	84.69%	84.00%	85.20%
Language other than English spoken at home, percent of persons age 5 years+, 2012-2016	3.65%	6.00%	21.10%

Factor	Declared Counties	Missouri	United States
EDUCATION (2012-2016)			
High school graduate or higher, >25 years old	83.52%	88.80%	87.00%
Bachelor's degree or higher, >25 years old	16.67%	27.60%	30.30%
HEALTH			
With a disability, under age 65 years, 2012-2016	14.39%	10.40%	8.60%
Persons without health insurance, under age 65 years, percent	13.37%	10.80%	10.20%
ECONOMY			
In civilian labor force, total, percent of population age 16 years+, 2012-2016	55.79%	62.90%	63.10%
Total manufacturers' shipments, 2012 (\$1,000)	47,285,681	111,535,362	5,696,729,632
Total merchant wholesaler sales, 2012 (\$1,000)	49,442,871	91,916,351	5,208,023,478
Total retail sales, 2012 (\$1,000)	54,903,912	90,546,581	4,219,821,871
Total retail sales per capita, 2012	\$11,118	\$15,036	\$13,443
TRANSPORTATION (2012-2016)			
Mean travel time to work (minutes), workers 16 years+	24.06	23.4	26.1
INCOME AND POVERTY (2012-2016)			
Median household income (in 2016 dollars)	\$38,846	\$49,593	\$55,322
Per capita income in past 12 months (in 2016 dollars),	\$20,424	\$27,044	\$29,829
Persons in poverty, percent	18.53%	13.40%	12.30%
BUSINESSES			
Total employer establishments, 2016	87,229	160,912	7,757,807
Total employment, 2016	1,304,185	2,494,720	126,752,238
Total annual payroll, 2016 (\$1,000)	57,299,020	112,072,115	6,435,142,055
Total employment, percent change, 2015-2016	1%	2.10%	2.10%

Source: CDBG-DR Action Plan, American Community Survey 2017

Individual Impacts

Total Number of Residences Impacted – 1,923

- Destroyed 396
- Major Damage 848
- Minor Damage 477
- Affected 202

Percentage of Insured Residences 19.6%

Percentage of Low-Income Households 49.2%

Percentage of Elderly Households 15.7%

Total Individual Assistance Cost Estimate \$28,583,646

Public Infrastructure Impacts

A FEMA Public Assistance Summary for DR-4317 indicates the receipt of 248 applicants requested assistance of which 223 were deemed eligible. The public infrastructure costs derived from the FEMA Project Worksheets total \$113.9M, almost doubling the initial estimate of \$57.2M. Almost every category has seen significant increases with Category C, Roads and Bridges increasing from an estimated \$32M to \$52M and Category F, Public Utilities increasing from \$11M to almost \$31M.

Additional applications came from 55 non-profit service providers in the area, one public institution of higher education, four independent school districts, six state government facilities, and two regional government organizations.

The primary infrastructure impacts were damages to roads and bridges.

Statewide per capita impact \$9.55

Statewide per capita impact indicator \$1.43

Total Public Assistance cost estimate \$57,198,629

Business Impacts

The Small Business Administration (SBA) conducted a survey of the 37 counties included in the Governor's request for Individual Assistance during the period May 10 through May 18, 2017.

Businesses Impacted

- 283 with major damage estimated at \$38,100,000
- 353 with minor damage estimated at \$12,600,000

Non-Profit Organizations

- 13 with major damage estimated at \$ 1,400,000
- 11 with minor damage estimated at \$ 197,000

In total, the SBA damage assessments indicated 1279 structures (homes and businesses) with major damage. Of those 37 counties, 27 counties were declared eligible for disaster loans. SBA declared access to economic injury-only loans to 27 more contiguous counties.

Presidential Declaration

On June 2, 2017, a Presidential Declaration of a Major Disaster was announced for a total of 55 counties in response to the historic flooding that caused destruction of homes, businesses, roads, bridges, other public infrastructure, as well as, damage and interruption of non-profit service providers. FEMA declared 33 counties for both Public Assistance and Individual Assistance, 20 counties for Public Assistance only, and 2 counties for Individual Assistance only.

4. Risk-Based Mitigation Needs Assessment

4.1 INTRODUCTION

To align with the requirements in the Federal Register Notice (84 FR 45840), the State of Missouri's Department of Economic Development (DED) has developed this risk-based mitigation needs assessment to identify and analyze all significant current and future disaster risks in order to provide a substantive basis for the activities proposed in Section 5 CDBG-MIT Program Design.

This Assessment:

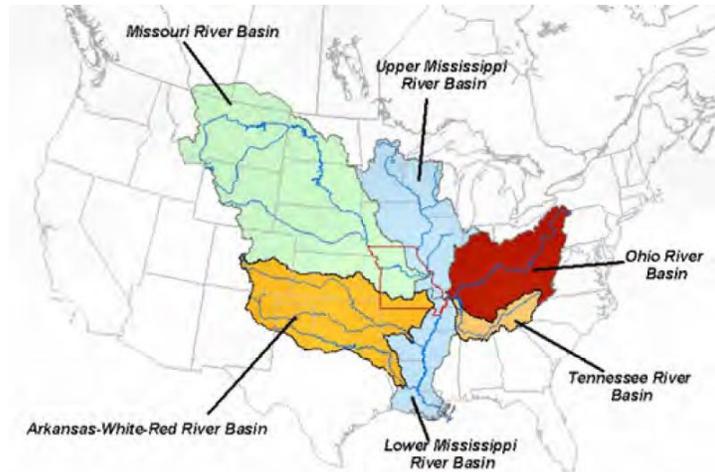
8. Provides an overview of Missouri's geographic landscape;
9. Summarizes climate trends and projections that may contribute to current and future risks;
10. Discusses historic damage patterns that have impacted the State of Missouri;
11. Identifies all considered resources including the FEMA approved State Hazard Mitigation Plan (SHMP) and local Hazard Mitigation Plans (HMP);
12. Assesses current and future risk to critical service areas or community lifelines;
13. Assesses risk to vulnerable populations and LMI;
14. Addresses unmet mitigation needs in response to identified current and future risks.

The State consulted with the State Emergency Management Agency (SEMA), regional planning commissions, the private sector, and other governmental agencies to provide a multi-hazard risk-based mitigation needs assessment for the HUD and Missouri State Most Impacted and Distressed (MID) Areas. This analysis of a broad range of data sources was key in development of a comprehensive assessment of the hazards discussed here, which pose substantial risk of loss of life, injury, damage and loss of property, along with suffering and hardship.

4.2 OVERVIEW OF STATE LANDSCAPE AND CLIMATE CONDITIONS

Missouri's landscape presents unique and dynamic challenges for the state in terms of hazards and risks. Because the land that forms the State of Missouri is contained within the Mississippi, Missouri, and Arkansas-White-Red River Basins (Figure 5), the state is faced with river drainage from multiple sources. One of these, the Mississippi River Basin, is the largest in terms of volume of water drained on the North American continent. Because of this, Missouri is subject to widespread flooding statewide.

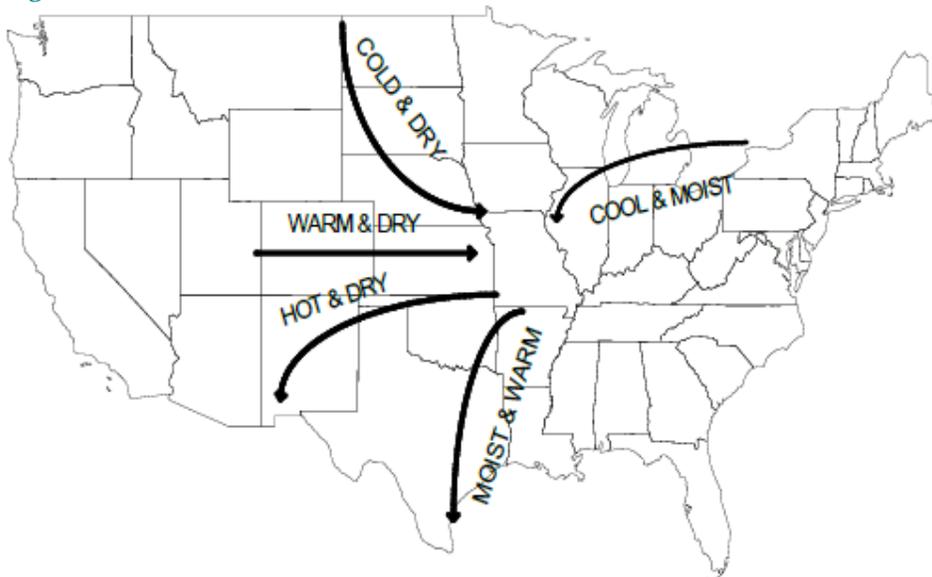
Figure 5



From <https://dnr.mo.gov/geology/wrc/interstatewaters.htm>

Missouri also lacks strong geographic barriers, which allows for cold, dry air from the north to collide with warm moist air from the Gulf of Mexico (Figure 6). This frequently triggers severe weather from thunderstorms, high winds, heavy rain, tornadoes, and hail³.

Figure 6



From Missouri State Hazard Mitigation Plan, Page 3.59

³ Missouri State Hazard Mitigation Plan, Page 3.51

Projected Climate Conditions

Missouri’s longstanding history of flooding and other risks may be affected by changing climate conditions. The SHMP highlighted projected changes in temperature, precipitation, and storm events.⁴ The findings of the recently released Fourth National Climate Assessment (NCA₄) provide updated information that reinforces the SHMP’s conclusions.⁵ These climate factors need to be considered in planning future investments, to help ensure that programs and projects successfully increase resilience under both current and future conditions. Key findings from NCA₄ and other sources are summarized below.

Temperature

Warm-season temperatures are projected to increase more in the Midwest than any other region of the United States. This dynamic will extend the number of frost-free days. Periods of extreme heat are expected to increase. The NCA₄ report states that “By the middle of this century (2036–2065), 1 year out of 10 is projected to have a 5-day period that is an average of 13°F warmer than a comparable period at the end of last century (1976–2005).⁶ Table 9 shows projected 5-day maximum temperatures for Southern Missouri.

Increasing average and extreme temperatures will contribute to increased incidence and duration of drought, with significant implications for Missouri’s agriculture, forests, and soil conditions, as well as impacts on water quality and public health. These impacts have both economic and social effects that can reduce communities’ adaptive capacity.

Table 9: Modeled Historical and Projected Average Annual 5-day Max Temperatures

Average Annual 5-Day Maximum Temperature			
Geographic Area	Modeled Historical (1976–2005)	Mid-21st Century (2036–2065) for Lower Scenario (RCP4.5)	Mid-21st Century (2036–2065) for Higher Scenario (RCP8.5)
Northern Minnesota	88°F	93°F	95°F
Southern Missouri	97°F	102°F	103°F

Table 21.1: These modeled historical and projected average annual 5-day maximum temperatures illustrate the temperature increases projected for the middle of this century across the Midwest. Sources: NOAA NCEI and CICS-NC.

Source: NCA₄, chapter 21.

⁴ Miss Missouri State Hazard Mitigation Plan, 2018, Chapter 3.

⁵ Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II, Chapter 21: Midwest. U.S. Global Change Research Program, Washington, DC, USA, pp. 872–940. doi: 10.7930/NCA4.2018.CH21

On the Web: <https://nca2018.globalchange.gov/chapter/midwest>

⁶ Vose, R.S., D.R. Easterling, K.E. Kunkel, A.N. LeGrande, and M.F. Wehner, 2017: Temperature changes in the United States. Climate Science Special Report: Fourth National Climate Assessment, Volume I. Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA, 185-206. <http://dx.doi.org/10.7930/J0N29V45>. As cited in NCA₄ Chapter 21.

Precipitation

Total annual precipitation in the Midwest has been increasing and this trend is projected to continue. According to NOAA, “Missouri has experienced an increase in the number of heavy rain events, and the state’s position in the lower river basins of several large Midwestern rivers makes downstream flooding an extreme hazard in this state. Missouri is ranked fourth in state losses due to flooding for the period of 1955–1997.”⁷

The NCA₄ states “Winter and spring precipitation are important to flood risk in the Midwest and are projected to increase by up to 30% by the end of this century. Heavy precipitation events in the Midwest have increased in frequency and intensity since 1901 and are projected to increase through this century.”⁸ This will further exacerbate Missouri’s risks of flooding incidents, and points to the need to plan for higher volumes of water and geographic extent of inundated areas.

4.3 HISTORIC DAMAGE PATTERNS & STORMS

Due to Missouri’s geography and weather patterns, the state has a long history of natural disasters. Ice storms, tornadoes, severe storms, and flooding are all common occurrences that impact the state of Missouri⁹. Since 1957, Missouri has received over 60 federal major disaster declarations (44 C.F.R. § 206.36(b)).

Major Disasters Declared

Table 10 shows major disaster declarations in the state of Missouri since 1957 by type.

Table 10: Major Disaster Declarations in State of Missouri

Year	Date	Disaster Type	Disaster Number
2019	20-Jul	Severe Storms, Tornadoes, and Flooding	4451
2019	20-May	Severe Storms, Straight-line Winds, and Flooding	4435
2017	28-Apr	Severe Storms, Tornadoes, Straight-line Winds, and Flooding	4317
2015	27-Dec	Heavy Rains, Widespread Flash Flooding, and Flooding	4250
2015	10-Aug	Severe Storms, Tornadoes, Straight-line Winds, and Flooding	4238
2014	31-Oct	Severe Storms, Tornadoes, Straight-line Winds, and Flooding	4200
2013	6-Sep	Severe Storms, Straight-line Winds, and Flooding	4144
2013	19-Jul	Severe Storms, Straight-line Winds, Tornadoes, and Flooding	4130
2011	22-Aug	Severe Storms, Tornadoes, and Flooding	4012

⁷ WWW.NCEI.NOAA.GOV | HTTPS://STATESUMMARIES.NCICS.ORG/MO | Lead Authors: Rebekah Frankson, Kenneth E. Kunkel | Contributors: Sarah Champion, Brooke C. Stewart

⁸ Easterling, D.R., K.E. Kunkel, J.R. Arnold, T. Knutson, A.N. LeGrande, L.R. Leung, R.S. Vose, D.E. Waliser, and M.F. Wehner, 2017: Precipitation change in the United States. Climate Science Special Report: Fourth National Climate Assessment, Volume I. Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA, 207-230. <http://dx.doi.org/10.7930/JoH993CC>.

⁹ Missouri State Emergency Management Agency https://sema.dps.mo.gov/maps_and_disasters/disasters/

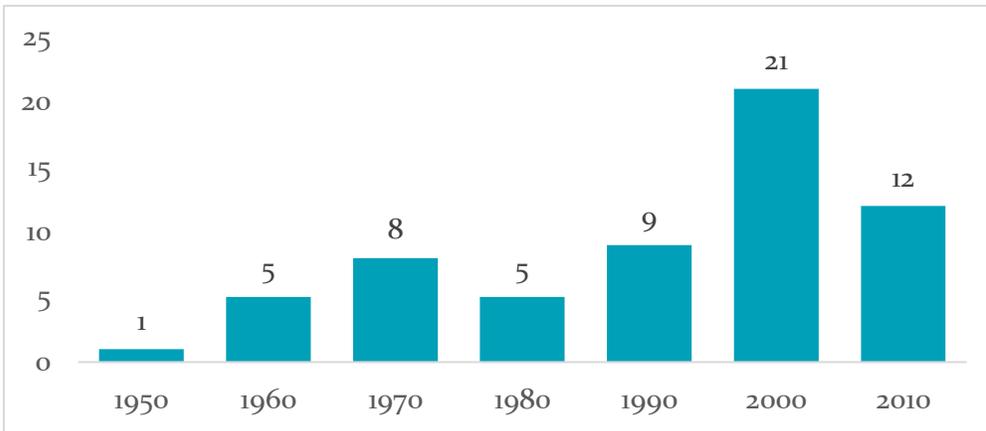
Year	Date	Disaster Type	Disaster Number
2011	22-Apr	Severe Storms, Tornadoes, and Flooding	1980
2011	23-Mar	Severe Winter Storm and Snowstorm	1961
2010	17-Aug	Severe Storms, Flooding, and Tornadoes	1934
2009	19-Jun	Severe Storms, Tornadoes, and Flooding	1847
2009	17-Feb	Severe Winter Storm	1822
2008	13-Nov	Severe Storms, Flooding, and a Tornado	1809
2008	25-Jun	Severe Storms and Flooding	1773
2008	23-May	Severe Storms and Tornadoes	1760
2008	19-Mar	Severe Storms and Flooding	1749
2008	12-Mar	Severe Winter Storms and Flooding	1748
2008	5-Feb	Severe Storms, Tornadoes, and Flooding	1742
2007	27-Dec	Severe Winter Storms	1736
2007	21-Sep	Severe Storms and Flooding	1728
2007	11-Jun	Severe Storms and Flooding	1708
2007	15-Jan	Severe Winter Storms and Flooding	1676
2006	29-Dec	Severe Winter Storms	1673
2006	2-Nov	Severe Storms	1667
2006	5-Apr	Severe Storms, Tornadoes, and Flooding	1635
2006	16-Mar	Severe Storms, Tornadoes, and Flooding	1631
2004	11-Jun	Severe Storms, Tornadoes, and Flooding	1524
2003	6-May	Severe Storms, Tornadoes and Flooding	1463
2002	6-May	Severe Storms and Tornadoes	1412
2002	6-Feb	Ice Storm	1403
2000	12-May	Severe Thunderstorms and Flash Flooding	1328
1999	20-Apr	Severe Storms and Flooding	1270
1998	19-Oct	Severe Storms and Flooding	1256
1998	14-Oct	Severe Storms and Flooding	1253
1995	2-Jun	Severe Storm, Tornadoes, Hail, Flooding	1054
1994	21-Apr	Severe Storm, Flooding, Tornadoes	1023
1993	1-Dec	Flooding, Severe Storm, Tornadoes	1006
1993	9-Jul	Flooding, Severe Storm	995
1993	11-May	Severe Storm, Flooding	989
1990	24-May	Flooding, Severe Storm	867
1986	14-Oct	Severe Storms, Flooding	779
1984	21-Jun	Severe Storms, Flooding	713
1982	10-Dec	Severe Storms, Flooding	672
1982	26-Aug	Severe Storms, Flooding	667
1980	15-May	Severe Storms, Tornadoes	620
1979	21-Apr	Tornadoes, Torrential Rain, Flooding	579
1977	14-Sep	Severe Storms, Flooding	538
1977	7-May	Tornadoes, Flooding	535

Year	Date	Disaster Type	Disaster Number
1976	21-Jul	Severe Storms, Flooding	516
1975	3-May	Tornadoes, High Winds, Hail	466
1974	10-Jun	Severe Storms, Flooding	439
1973	1-Nov	Severe Storms, Flooding	407
1973	19-Apr	Heavy Rains, Tornadoes, Flooding	372
1965	27-Jul	Severe Storms, Flooding	203
1965	14-Jun	Flooding	198
1964	8-Jul	Severe Storms, Flooding	173
1961	27-May	Floods	114
1960	20-Apr	Floods	100
1957	22-May	Tornadoes, Floods	75

Data Retrieved from <https://www.fema.gov/disasters>

Figure 7 summarizes the trend of disaster declarations over time since the 1950s for the state.

Figure 7: Missouri Declared Disasters by Decade (1957-2019)

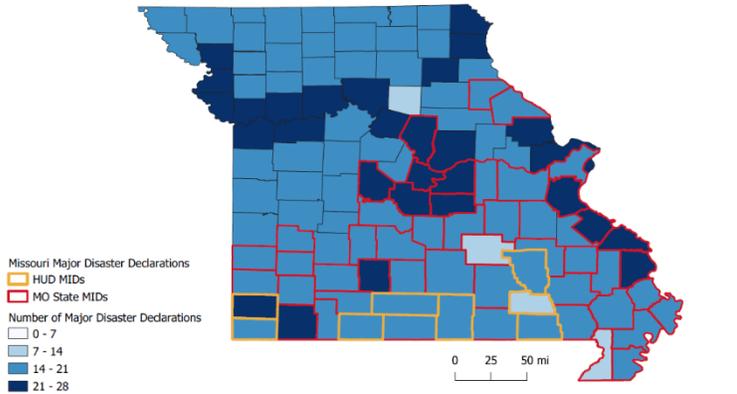


Data Retrieved from <https://www.fema.gov/disasters>

Disasters in Missouri are often widespread and impact several counties. Table 11 depicts the total disaster declarations that have impacted the 55 State and HUD Most Impacted and Distressed (MID) counties in the state respectively and Figure 8 depicts this visually.

Figure 8: Major Declared Disasters by County

Missouri Major Declared Disasters by County 1957 - 2017



Data from FEMA Summary of Disaster Declarations and Grants - [fema.gov/media-library/assets/documents/106308](https://www.fema.gov/media-library/assets/documents/106308)

Table 11: Major Disasters in State and HUD MID Counties 1957 - 2017

County Name	Total Declared Disasters
Jefferson	25
Miller	25
Osage	25
Webster	25
Ste. Genevieve	24
Cole	23
Newton	23
Barry	22
Boone	22
Cape Girardeau	22
Marion	22
Morgan	22
Perry	22
Camden	21
Pike	21
Ralls	21
Stone	21
Dallas	20
Franklin	20
Greene	20
McDonald	20
Phelps	20
Pulaski	20
Scott	20
St. Louis	20
Texas	20
Barton	19
Cedar	19
Iron	19
Bollinger	18
Christian	18
Crawford	18
Dade	18
Jasper	18

HUD MID
State MID

4.4 DATA SOURCES, RESEARCH AND ANALYSIS

Considered Resources

Missouri Department of Economic Development certifies that, in responding to this Action Plan requirement and presenting the required information, the department has reviewed and considered all applicable sources including, but not limited to:

1. The FEMA Hazard Mitigation Plan Resources
<https://www.fema.gov/hazard-mitigation-planning-resources>
2. The FEMA State Mitigation Planning Resources
website: <https://www.fema.gov/state-mitigation-planning-resources>;
3. FEMA State Mitigation Planning Key Topics Bulletins:
https://www.fema.gov/medialibrary/assets/documents/il_5780;
4. The FEMA Local Mitigation Planning Resources
<https://www.fema.gov/local-mitigation-planning-resources>;
5. The U.S. Forest Service's wildland fire resources:
<https://www.fs.fed.us/managing-land/fire>
6. The National Interagency Coordination Center (NICC):
<https://www.nifc.gov/nicc/>
7. HUD's CPD Mapping Tool:
<https://egis.hud.gov/cpdmaps/>.
8. DHS Office of Infrastructure Protection:
<https://www.dhs.gov/sites/default/files/publications/ip-fact-sheet-508.pdf>;
9. FEMA Community Lifelines Implementation Toolkit
<https://www.fema.gov/media-library/assets/documents/177222>
10. Army Corps of Engineers, 2015. Recent US Climate Change and Hydrology Literature Applicable to US Army Corps of Engineers Missions - Upper Mississippi Region.
11. U.S. Department of Energy Office of Energy Policy and Systems Analysis. Climate Change and the U.S. Energy Sector: Regional Vulnerabilities and Resilience Solutions, October 2015

State Hazard Mitigation Plan

The state of Missouri's 2018 Hazard Mitigation Plan is the most recent risk assessment completed through FEMA's Hazard Mitigation Plan process and serves as the foundation for this Risk-Based Mitigation Needs Assessment. The State's FEMA approved Hazard Mitigation Plan (SHMP) was completed by Missouri's Department of Public Safety, State

Emergency Management Agency (SEMA). This Missouri State Hazard Mitigation Plan is a critical component of state-level programs for management of disasters and their impacts and takes into account years of mitigation experience and initiatives. The plan serves to summarize the methods the State will use to prioritize cost-effective mitigation measures and provides a blueprint for hazard mitigation activities in Missouri¹⁰. The plan includes a risk assessment that identifies the type and location of hazards that can affect Missouri and vulnerability to those hazards identified. This Risk-Based Mitigation Needs assessment aligns with the hazards discussed in the State Hazard Mitigation Plan's Risk Assessment.

Missouri State Hazard Mitigation Viewer

As part of Missouri's 2018 Hazard Mitigation Plan update, SEMA provided online access to the risk assessment data and associated mapping for the 114 counties in the State through a web-based Missouri Hazard Mitigation Viewer. This application provides local planners or other interested parties hazard datasets used to develop the 2018 State Plan update which can be used for both statewide and local risk assessments in one central location. These datasets were utilized as a starting point for much of the Risk-Based Mitigation Needs Assessment in this plan in an effort to align with the state Hazard Mitigation Plan.

2019/2020 Missouri Association of Council of Governments (MACOG) Survey

In addition, in December of 2019 the Missouri's Department of Economic Development developed a survey for each of the State's regional planning commissions in order to obtain additional detail regarding the impacts to the communities in their areas, identified risks, costs of the 2017 disaster, and types of mitigation activities they would like to see implemented with the CDBG-MIT funds in their areas. The survey was implemented via a Google Form and sent via email to potential participants. The results of this survey can be found in Appendix 2.

ANALYSIS OF LOCAL MITIGATION PLANS

As part of the State's 2018 FEMA approved Hazard Mitigation Plan, the State Emergency Management Agency (SEMA) reviewed the risk assessments of each county's FEMA approved local, regional or multi-jurisdictional hazard mitigation plan in order to help the State better understand vulnerability of the jurisdictions and identify those most threatened by hazards. The ranking given was primarily described in terms of high, moderate, or low¹¹. Several local HMPs were expired or will be due to expire at the time this action plan is published. For purposes of this risk assessment, the State utilized the best or most recent available data and aligned this table to what has been published in the State's Hazard Mitigation Plan. A list of the Missouri Local Hazard Mitigation Plans, with

¹⁰ Missouri State Hazard Mitigation Plan, Page 2

¹¹ Missouri State Hazard Mitigation Plan, Section 3.563, Page 593

https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/MO_Hazard_Mitigation_Plan2018.pdf

expiration dates, is available on SEMA’s website here:

<https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/local-hazard-mitigation-list-update.pdf>. These counties should note they are eligible for funding to update local hazard mitigation plans through this funding opportunity.

Missouri’s department of Economic Development used the findings here and identified the HUD and State MIDs in Table 12 Hazard Rankings by County for HUD and State MIDs.

Table 12: Hazard Rankings by County for HUD and State MIDs

County	Flooding (Major and Flash)	Levee Failure	Dam Failure	Earthquake	Land Subsidence / Sink Holes	Drought	Extreme Temperature	Severe Thunderstorm	Severe Winter Storm	Tornadoes	Wildfire	HUD MID County
												State MID County
												Hazard Ranking
												High
												Moderate
												Low
Carter	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Douglas*		L	M	L	M		H		H		H	
Howell	L	M	H	M	M		H		H	H	H	
McDonald*	L	M	L	M	H		M		M	H	H	
Newton	L	M	L	M	L		M		M	M	H	
Reynolds	M	M	H	L	H		H		H		M	
Ripley									M		M	
Taney	M	L	L	H	M		H		M	H	H	
Barry	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Barton									M		M	
Bollinger		M	M		M				H	H	H	
Boone	M	H	M	H	H		H		H	H	H	
Butler	M	M	H	L	H		H		H		H	
Camden	L	H	L	H	M	L	H		H	H	H	
Cape Girardeau	L	M	M	M	M	M	H	L	H	H	H	
Cedar	L	M	L	L	M	L	H	M	M	H	H	
Christian												
Cole	L	H	M	M	H		H	M	H	H	H	
Crawford	L	L	M	H	H	L	H		H	H	M	
Dade	M	M	L	M	L	L	M		M	H	H	
Dallas	L	L	L	L	L	L	H		H	H	H	
Dent	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Dunklin	M	M	M		M		M		M	H	M	
Franklin	L	M	H	M	H		H		L	H	H	
Gasconade	L	L	M	H	H	L	H		H	H	L	
Greene	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Iron	M	M	M	H	M	L	H		H	H	H	
Jasper	L	M	L	M	L	L	M		M	M	H	
Jefferson	L	M	H	L	H		H		M	H	H	
Lawrence	L	M	M		L	L	M		L	H	H	
Madison	L	L	M	L	L		H		M	H	H	
Maries	L	L	M	H	H	L	H		H	H	L	
Miller	L	M	L	L	M		H		H		H	
Mississippi		M	H		M		M		M	H	M	
Morgan	L	M	L	M	M	L	H		H		H	
New Madrid		M	M		M		M		M	H	M	

County	Flooding (Major and Flash)	Levee Failure	Dam Failure	Earthquake	Land Subsidence / Sink Holes	Drought	Extreme Temperature	Severe Thunderstorm	Severe Winter Storm	Tornadoes	Wildfire
Oregon	L	M	M	M	L		H		H	H	H
Osage	L	L	M	H	H	L	H	L	H	H	M
Ozark	L	L	M	L	M		H		H		H
Pemiscot		M	H		M		H		M	H	M
Perry	L	M	M	M	M	H	H	L	M	H	H
Phelps		L		H	L				L	M	H
Pike	L	M	M	L	M	L	H		H	M	M
Pulaski		L		H	L				L	M	H
Ralls	M	M	L	L	M	L	H		M	H	H
Scott	L	M	M		M		M		M	H	M
Shannon	L	L	M	L	M		H		H		H
St. Louis	L	M	H	L	H		H		H	H	H
Ste. Genevieve	M	M	M	M	M	M	H	M	H	H	H
Stone	L	L	L	L	L		H		H	H	H
Texas	L	M	M	L	L		H	L	M	H	H
Wayne	M	M	H	M	M		H		M		H
Webster	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Wright	L	L	L	L	L		L		M	M	M

Retrieved from Missouri State Hazard Mitigation Plan, Section 3.568

[https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/MO_Hazard Mitigation Plan 2018.pdf](https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/MO_Hazard_Mitigation_Plan_2018.pdf)

Based on the above local risk assessment summary, the State Emergency Management Agency (SEMA) summarized the hazards by number of counties that ranked them at each of the scale levels: High, Moderate, and Low¹². This analysis was used to determine which hazards are of high concern to each county and allowed for identification of the top ranked hazards statewide as shown in Table 13.

Table 13: Local Risk Assessment Hazard Ranking Summary (Ranked by Number of Highs)

Hazard	High	Moderate	Low	N/A
Thunderstorms	67	17	1	29
Tornadoes	66	29	3	16
Flooding (Riverine and Flash)	57	26	8	23
Severe Winter Weather	52	40	6	16
Extreme Temperatures	23	57	19	15
Earthquakes	17	42	36	19
Fires (Urban/Structural and Wild)	15	35	39	25
Drought	11	60	27	16

¹² Missouri State Hazard Mitigation Plan, Section 3.563 Page 534

Hazard	High	Moderate	Low	N/A
Lightning	5	3	6	100
Levee Failure	3	9	7	95
Dam Failure	2	23	62	27
Land Subsidence/Sinkholes	1	4	28	81

Table from Missouri State Hazard Mitigation Plan, Section 3.564 Page 594

The data suggests that based on total number of high ranking in each of Missouri’s county local hazard mitigation plans, the top risks impacting the state in order are:

5. Thunderstorms
6. Tornadoes
7. Flooding (riverine and flash)
8. Severe winter weather

For this reason, the State of Missouri has identified the above hazards as the state’s greatest risks, which are discussed in Section 4.5.

4.5 STATE GREATEST RISK PROFILE

Severe Thunderstorm

Overview of Hazard

A thunderstorm is defined as a storm that contains thunder and lightning, caused by unstable atmospheric conditions. Upper level cold air sinks, while warm moist air rises, spurring the development of storm clouds or “thunderheads,” resulting in a thunderstorm. Thunderstorms can occur singularly, or in clusters or lines. A “severe” thunderstorm according to the National Weather Service is one that contains either one inch hail or wind gusts exceeding 58mph (note that the size range for severe storm was upgraded from $\frac{3}{4}$ of an inch to one inch during the development of the SHMP, so $\frac{3}{4}$ inch was used for the development of the SHMP)¹³. Severe thunderstorms are associated with other hazards such as flooding, tornadoes, damaging winds, hail and lightning. This section focuses on damaging winds, hail and lightning.

Damaging winds

Thunderstorms can produce damaging winds such as downbursts, microbursts, and straight-line winds. Downbursts are localized currents of air that emanate from a point source above and blow out radially from the ground surface landing point. Microbursts are smaller downbursts occurring in an area of less than 2.5 miles across. Downbursts

¹³ Missouri State Hazard Mitigation Plan Section 3.280

create wind shear (rapid change in wind speed or direction) and can also create straight-line winds (thunderstorm winds not associated with rotation).¹⁴

Lightning

Lightning is a giant spark of electricity in the atmosphere between clouds, the air and the ground, and can strike as far as 10 miles away from the rainfall area. Lightning is more likely to strike tall objects such as buildings, trees or mountains.¹⁵

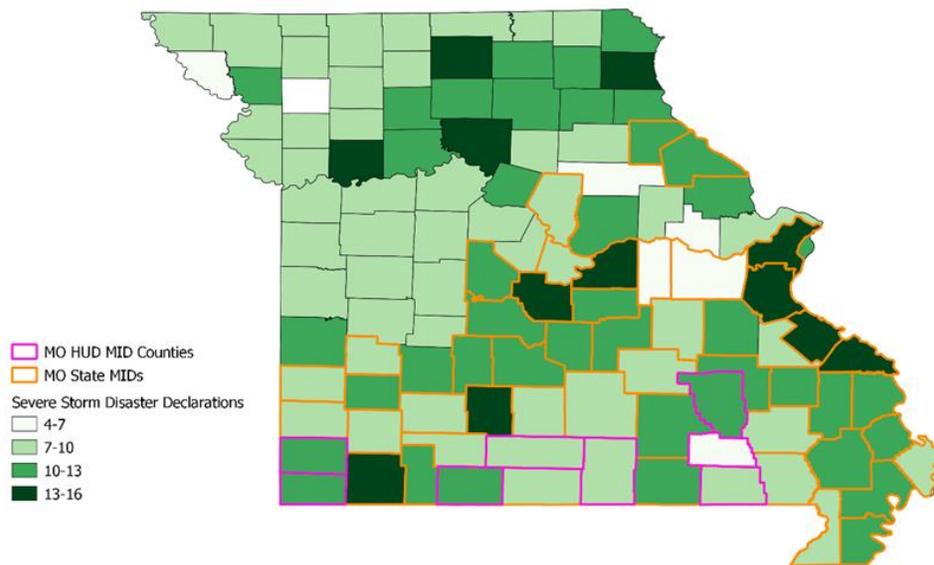
Hail

Hail is precipitation in the form of solid ice that forms inside thunderstorm updrafts. Hail can range in size from tiny pellets smaller to a pea to grapefruit sized. Large hailstones (over 4inch diameter) can fall at speeds of 100mph.¹⁶

Historical Impact Statewide

Severe thunderstorms are common in Missouri, with all areas of the state affected. In the past 40 years, Missouri has experienced 10,593 high wind events over 40mph. These events have caused a total of \$289m in property damages and \$33m in crop losses.¹⁷ In the same time period, there were 12,694 hail events with hail larger than ¾ inch, with property damages topping \$1bn. 226 lightning events were also reported, with over \$9m in damages. From 1975 to 2016, there were 41 presidentially declared disasters in Missouri which included severe thunderstorms.

Figure 9: Severe Thunderstorm Disaster Declarations by County 1975-2016



¹⁴ <https://www.nssl.noaa.gov/education/svrwx101/wind/types/>

¹⁵ <https://www.nssl.noaa.gov/education/svrwx101/lightning/>

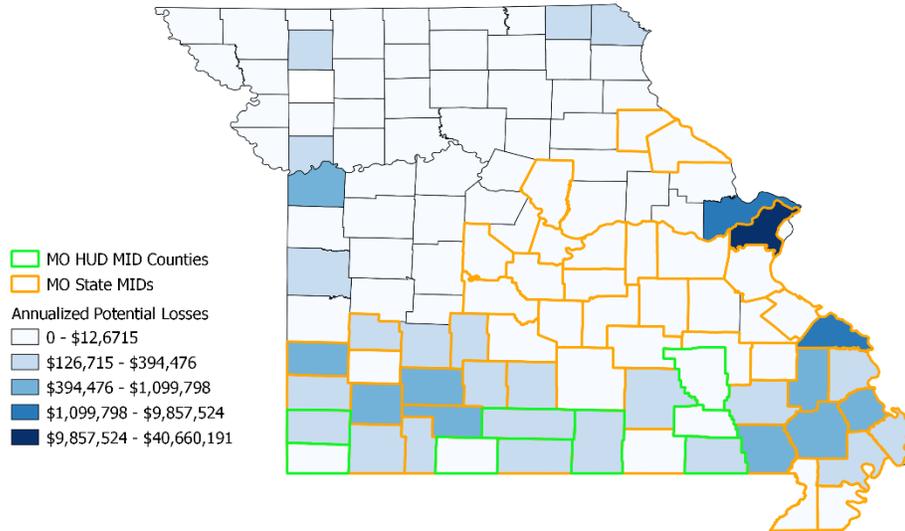
¹⁶ <https://www.nssl.noaa.gov/education/svrwx101/hail/>

¹⁷ Source: NCEI (<http://www4.ncei.noaa.gov/cgi-win/wwcgi.dll?wwEvent~Storms>); *Through 12/31/2016

Future Risk

While severe thunderstorms effect the whole state, potential losses (annualized losses from wind damage, hail, and lightning are highest in the southern part of the state, as well as areas with high population density around St. Louis. Six of the top ten highest potential loss counties are State MID counties.

Figure 10: Annualized Potential Losses from Severe Thunderstorms by County



Source: State Hazard Mitigation Plan page 3.313; aggregated High Wind, Hail and Lightning

Figure 11: Top Ten Counties for Severe Storm Annualized Potential Losses

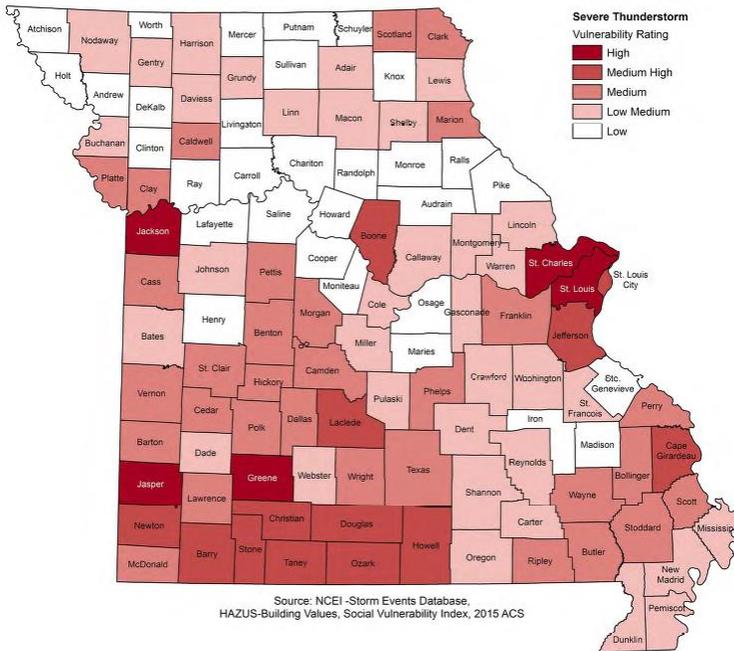
County	Severe Thunderstorm Annualized Potential Loss
St Louis	\$40,660,191.00
St Charles	\$9,857,524.00
Perry	\$2,768,048.00
Jackson	\$1,099,798.00
Greene	\$898,315.00
Butler	\$585,333.00
Bollinger	\$552,048.00
Stoddard	\$546,858.00
Lawrence	\$546,524.00
Scott	\$546,382.00

State MID
County

HUD MID Counties	
County	Severe Thunderstorm Annualized Potential Loss
Ripley	\$328,000.00
Douglas	\$301,262.00
Newton	\$207,001.00
Howell	\$199,810.00
Taney	\$126,715.00
Carter	\$121,000.00
Reynolds	\$ 2,905.00

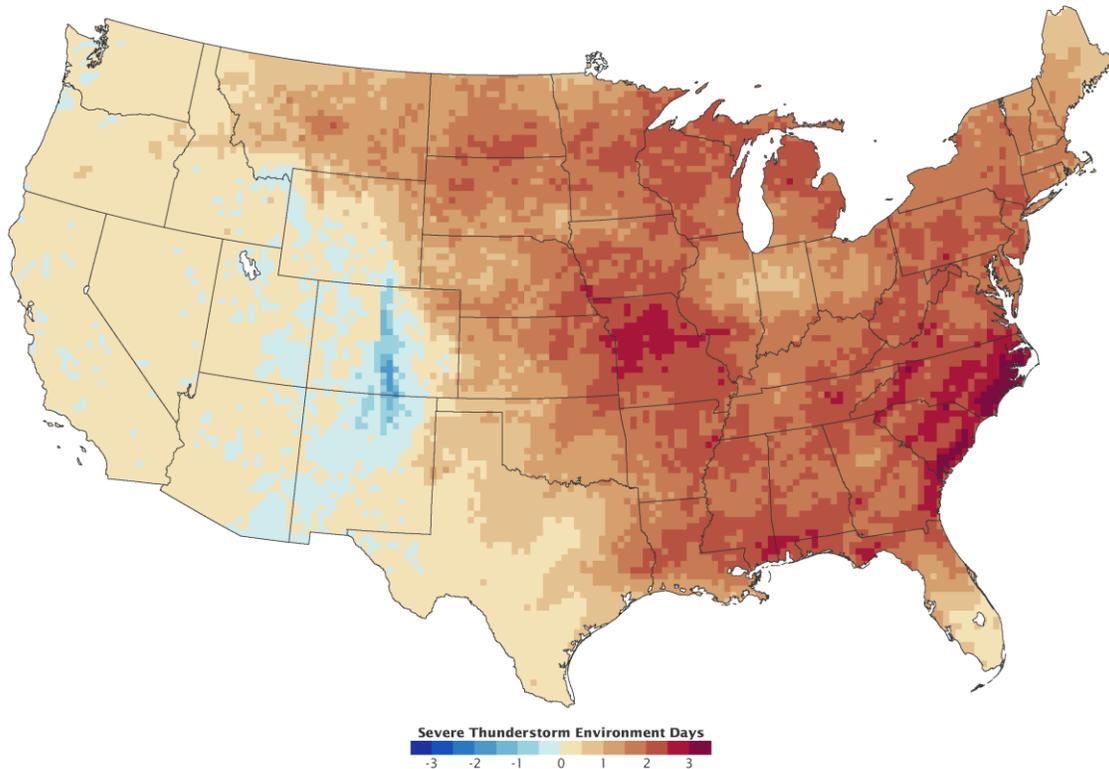
The State HMP conducted an analysis to determine vulnerability to severe thunderstorms across Missouri using data from the National Center for Environmental Information (NCEI), HAZUS Building Exposure Value data, manufactured housing unity (MHU) data from the US Census, and the Social Vulnerability Index (SOVI). The analysis took into account housing density, building exposure, percentage of MHUs, social vulnerability, likelihood of occurrence and past property loss. The combined vulnerability summary map for severe thunderstorms is shown below:

Figure 12: Social Vulnerability Map for Severe Thunderstorms



While climate change was not factored into the vulnerability analysis, climate change is expected to cause increases in the number of days with favorable conditions for thunderstorms, with Missouri seeing 2-3 increased days per year, as evidenced in the map below¹⁸.

Figure 13: Projection of Increase in Severe Thunderstorm Environment Days 1962-2099, NASA



Source: <https://earthobservatory.nasa.gov/images/80825/severe-thunderstorms-and-climate-change>

Tornadoes

Overview of Hazard

Tornadoes are narrow, violently rotating columns of air that extends from a thunderstorm cloud to the ground. Tornadoes are a vortex storm with two types of winds: rotational and uplift current. winds can measure up to 500 miles per hour and the dynamic forces of these two wind types can cause dangerous vacuums that overpressure buildings from the inside. Tornadoes' destruction is a result of these winds themselves coupled with the powerful impacts of windblown debris. The tornado's contact with the ground typically

¹⁸ <https://earthobservatory.nasa.gov/images/80825/severe-thunderstorms-and-climate-change>

lasts 30 minutes and covers a distance of 15 miles. The width of a tornado is usually about 300 yards but can be up to a mile wide.

Tornadoes are more common in the Midwest, where geography and meteorological conditions are favorable to their formation. During the spring and fall, the jet stream (prevailing winds in the US) crosses Missouri, During the spring and fall, the jet stream (prevailing wind stream in the US that separates the dry northern air from warm Gulf air) crosses Missouri, causing large thunderstorms that can lead to tornadoes. Tornadoes are very difficult to predict, meaning that impacted communities often have little warning before a tornado strikes. Coupled with their destructive power, these factors make them costly and deadly.

Historical Impact Statewide

Missouri is affected by tornadoes every year. On average, 39-40 tornadoes hit the state each year, with approximately 6 deaths and 66 injuries. Since 1950, 2,650 tornadoes have been recorded in Missouri, with 394 deaths and 4,430 injuries. Since 1975, 25 presidential disaster declarations have been made that have included tornado activity. According to the USDA, insured crop losses from tornadoes in the past ten years have totaled \$139,097.

Figure 14: Deaths in Missouri due to Tornadoes, 1950-2019 by County

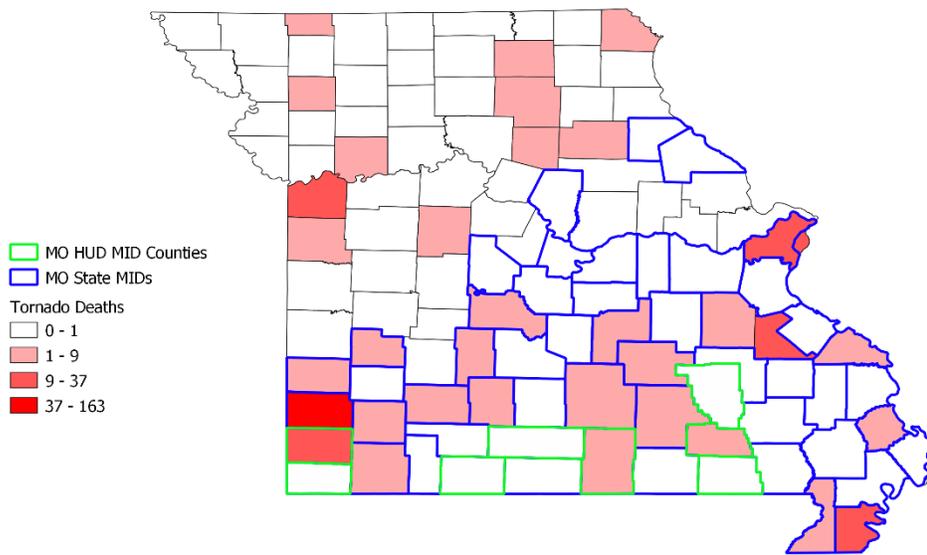


Table 14: Counties with >1 Tornado Death, 1950-2019

County	Deaths
Jasper County	163
Jackson County	37
Pemiscot County	22
Newton County	17
St. Louis County	15

County	Deaths
St. Francois County	13
St. Louis City County	11
Lawrence County	9
Carter County	7
Scott County	7
Barton County	5
Greene County	5
Washington County	5
Camden County	4
Cedar County	4
Randolph County	4
Barry County	3
Cass County	3
Dallas County	3
Dekalb County	3
Perry County	3
Pettis County	3
	3
Adair County	2
Clark County	2
Dent County	2
Dunklin County	2
Howell County	2
Macon County	2
Monroe County	2
Phelps County	2
Ray County	2
Texas County	2
Webster County	2
Worth County	2
Andrew County	1
Bollinger County	1
Butler County	1
Caldwell County	1
Callaway County	1
Cape Girardeau County	1
Christian County	1
Henry County	1
Johnson County	1
Lafayette County	1
Ripley County	1
Stoddard County	1
Sullivan County	1

Data Source: <https://www.ncdc.noaa.gov/stormevents/choosedates.jsp?statefips=29%2CMISSOURI>

Tornado deaths are a major cause of concern for the state of Missouri. In May 2011, a supercell thunderstorm storm produced an EF-5 tornado over Joplin, Missouri which

causing incredible devastation and resulted in in 158 fatalities and over 1000 injuries in the Joplin MO area¹⁹. These types of deaths are preventable with proper mitigation measures such as tornado safe rooms.

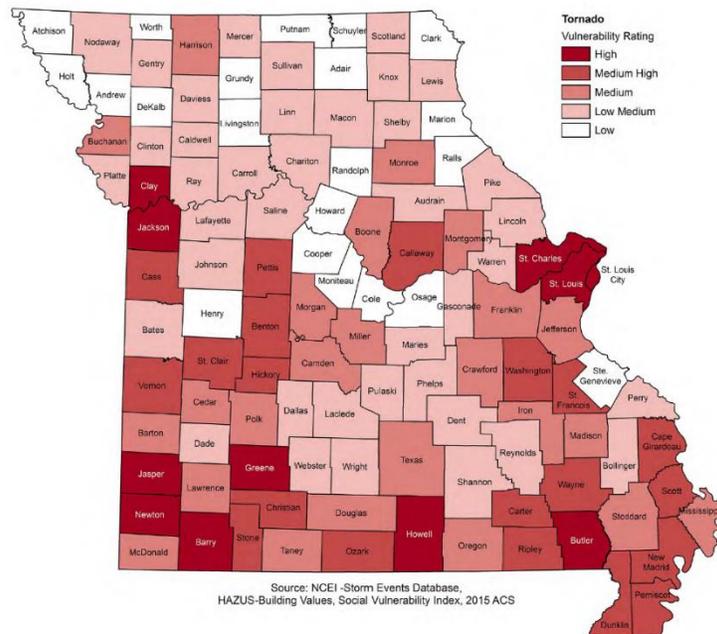
Future Risk

While relatively rare overall, each tornado has the potential for catastrophic damage and loss of life in its path. In total 66 county local hazard mitigation plans rated the risk of tornados as high.

In addition, tornados may become more frequent due to climate change. 2015 research concluded that the number of days with large tornado outbreaks has been increasing since the 1950s, continuing to the present²⁰.

The State HMP conducted an analysis to determine vulnerability to tornadoes across Missouri using data from the National Center for Environmental Information (NCEI), HAZUS Building Exposure Value data, manufactured housing unity (MHU) data from the US Census, and the Social Vulnerability Index (SOVI). The analysis took into account housing density, building exposure, percentage of MHUs, social vulnerability, likelihood of occurrence and past property loss. The combined vulnerability summary map for tornadoes is shown below. Several HUD and State MID counties are rated as “high” vulnerability, including St. Louis, Newton, Barry, Greene, Howell and Butler.

Figure 15: Social Vulnerability for Tornadoes

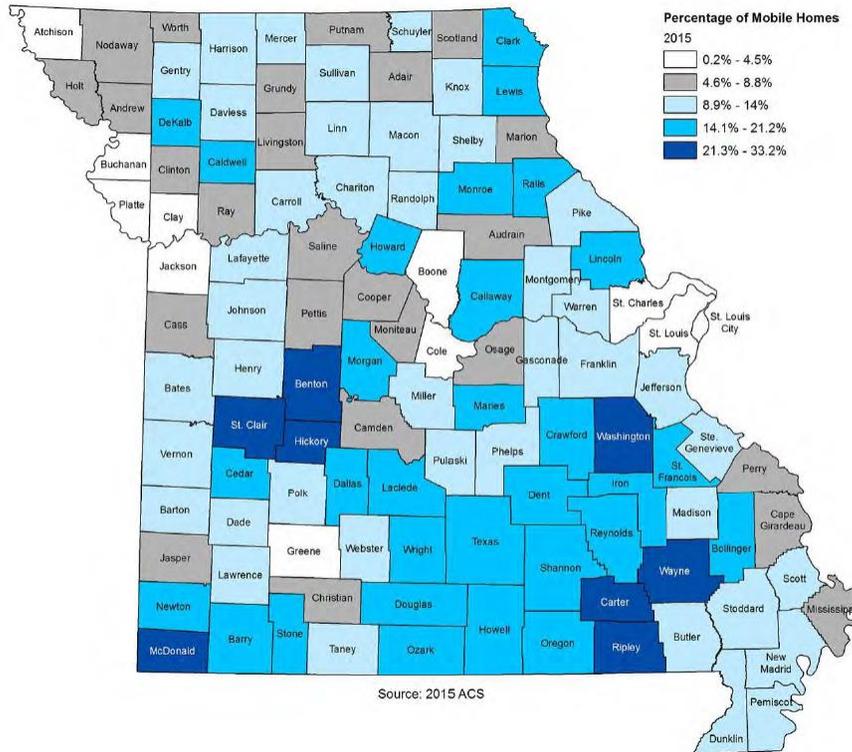


¹⁹ 7th Anniversary of the Joplin Tornado - May 22nd, 2011 from: https://www.weather.gov/sgf/news_events_2011may22

²⁰ State Hazard Mitigation plan page 3.377

One factor that was taken into account for this vulnerability analysis to tornadoes is the percentage of MHUs in each county. It is notable that this percentage is high in several HUD and State MID counties including Washington, Wayne, Carter, and Ripley.

Figure 16: Percent of Mobile Homes Affecting Vulnerability



Flooding

Overview of Hazard

Flooding is defined as the partial or complete inundation of normally dry land areas resulting from the overflow of inland or tidal water and surface water runoff from any source. Floods are one of the most common natural disasters in the United States and one of the greatest risks facing the state of Missouri. Within the state, there are typically two distinct types of flooding that should be noted:

Riverine flooding

Riverine flooding is defined as the overflow of rivers, streams, drains, and lakes due to excessive water from sources like rainfall or rapid melting of snow or ice. There are several

types of riverine floods, including headwater, backwater, interior drainage, and flash flooding²¹.

Flash flooding

Flash flooding is characterized by the rapid accumulation or runoff of surface waters from any source. This type of flooding impacts smaller rivers, creeks, and streams and can occur as a result of dams being breached or overtopped. Because flash floods can develop in a matter of hours, most flood-related deaths result from this type of event²².

Flooding as a Result of Levee or Dam Failure

Levee Failure

Levees are embankments constructed along rivers and coastlines that serve to protect adjacent lands from flooding. Levee failure refers to either breaching or overtopping of a levee whereby part of the levee structure breaks away allowing water to rush through, or floodwaters rise above the levee. This causes a sudden and often highly damaging release of flood surge or flood wave downstream.

Dam Failure

A dam is typically defined as an artificial barrier that is constructed across a stream or water channel, to block off water flow. Dam failure is characterized by an uncontrolled release of water from behind a dam as a result of structural deficiency or damage due to flooding, earthquakes, landslides, poor construction or maintenance, improper operation, or intentional destruction. Similar to levee failure, when a dam failure occurs, a large and damaging volume of water is immediately released. This has the potential to damage infrastructure and cause flooding to the area downstream of the dam.

The 2018 Missouri SHMP recognizes Levee and Dam Failure as their own natural, flood-related hazards. However, the state also recognizes that only a limited number of local hazard mitigation plans discussed levee failure as a hazard separate from flooding²³. For this reason, this action plan discusses flooding as one sole hazard.

Data and Sources on Historical Impact on HUD and State MIDs

Missouri has a long history of extensive flooding over the past century as flooding along Missouri's major rivers generally results in slow moving disasters and places a heavy burden in terms of human suffering and losses to public and private property²⁴. A study by NOAA documented an increase in extreme precipitation events in Missouri since 1900, as shown in Figure 17.

²¹ Missouri State Hazard Mitigation Plan, Page 3.80

²² Missouri State Hazard Mitigation Plan, Page 3.80

²³ Missouri State Hazard Mitigation Plan, Page 3.563

²⁴ Missouri State Hazard Mitigation Plan, Page 3.82

Figure 17: Extreme Precipitation Events

Observed Number of Extreme Precipitation Events

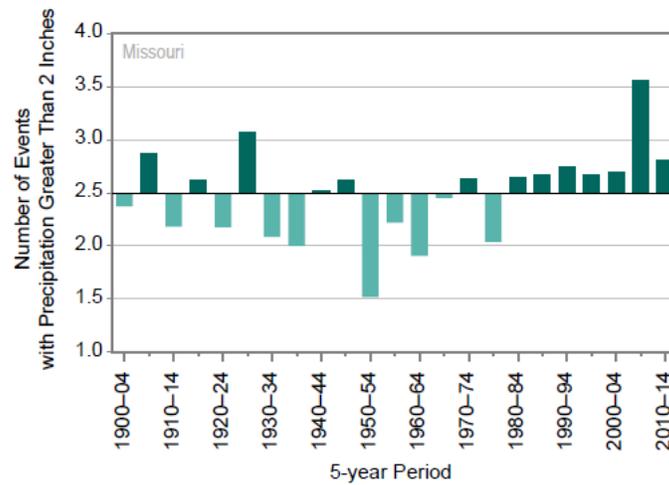


Figure 5: The observed number of days with extreme precipitation events (annual number of days with precipitation above 2 inches) for 1900–2014, averaged over 5-year periods; these values are averages from 28 long-term reporting stations. The dark horizontal lines represent the long-term average. A typical station experiences 2–3 days annually with 2 inches or more of precipitation. Over the past three decades, Missouri has experienced an above average number of extreme precipitation events, with the highest number occurring during 2005–2009 when a typical station experienced 3–4 such events each year. Source: CICS-NC and NOAA NCEI.

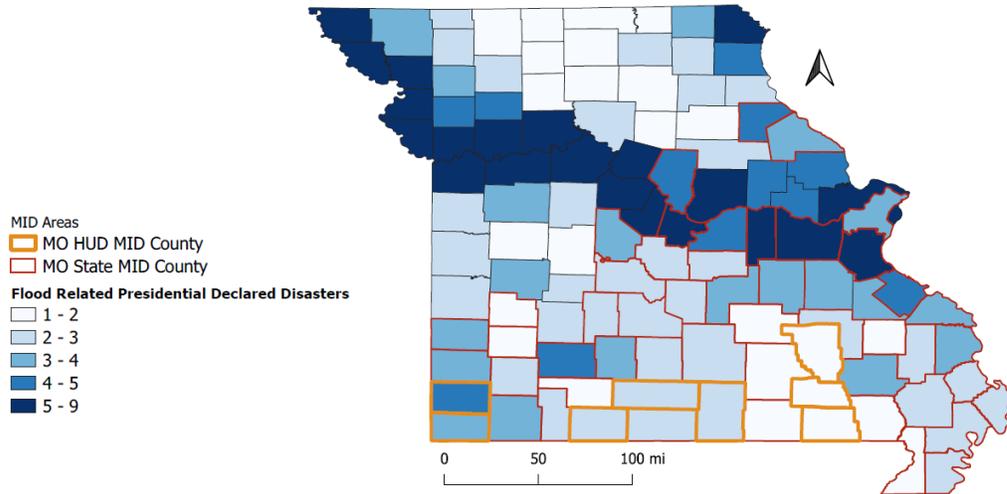
Source: NOAA National Centers for Environmental Information | State Summaries 149-MO.
www.NCEI.NOAA.Gov | <https://Statesummaries.NCICS.Org/Mo> | Lead Authors: Rebekah Frankson, Kenneth E. Kunkel | Contributors: Sarah Champion, Brooke C. Stewart

Flash flood events in recent years have caused a higher number of deaths and major property damage in many areas across the state. The State of Missouri has had more than 40 flood-related disaster declarations since the 1970s²⁵ which have impacted all of the counties within the state to varying degrees as depicted in Figure 18.

²⁵ FEMA.gov <https://www.fema.gov/media-library/assets/documents/106308>

Figure 18: Flood-Related Disaster Declarations 1960 - 2017

Number of Flood Related Presidential Disaster
Declarations 1960 - 2017



Data from: <https://www.fema.gov/disasters/state-tribal-government/>

The analysis here shows that historically, the following State or HUD MID counties have had the most flood-related presidentially declared disasters:

Table 15. Top 10 Counties with Most Flood Related Presidential Declared Disasters 1960 – 2017

County	Flood Related Presidential Declared Disasters	State MID	HUD MID
Franklin	8		
Cole	7		
Gasconade	6		
Jefferson	6		
Boone	5		
Greene	5		
Osage	5		
Ralls	5		
St. Genevieve	5		
Newton	5		

However, the number of presidentially declared disasters is not fully indicative of the type of damage and impact that floods have on the State of Missouri. SEMA analyzed National Flood Insurance Program (NFIP) flood-loss data in order to determine areas of Missouri with the greatest flood risk. The greatest losses have been in the counties along the

Mississippi River corridor²⁶. The top 10 counties for flood insurance dollars historically paid from 1978 to 2017 are depicted in Table 16.

Table 16: Top 10 Counties for Flood Insurance Dollars Paid (Historical), 1978-2017

County	Dollars Paid (Historical)	Flood Claims	Current Policies	Coverage
St. Louis	\$ 184,007,986	10,427	3,968	\$1,024,874,500
St. Charles	\$ 135,291,321	10,999	1,707	\$361,441,500
Jefferson	\$ 58,862,527	4,604	1,101	\$187,524,500
Clay	\$ 44,314,003	2,351	1,469	\$398,377,000
Holt	\$ 34,003,713	1,106	214	\$24,946,800
Lincoln	\$ 32,481,413	2,332	360	\$40,671,900
Franklin	\$ 25,889,776	1,092	412	\$70,329,700
Taney	\$ 16,308,666	387	517	\$90,706,400
Platte	\$ 13,828,821	380	182	\$47,705,800
Buchanan	\$ 13,514,850	435	352	\$69,651,900
Totals	\$558,503,076	34,113	7,715	\$2,316,230,000

State MID
HUD MID

Source: Table from State Hazard Mitigation Plan, Page 3.106, Data from FEMA CIS November 2017
Note: Only NFIP participating communities can have flood insurance losses

Repetitive Loss from Floods

Missouri’s State Emergency Management Agency (SEMA) employs a Repetitive Flood Loss Strategy which is based on the State Risk Assessment and the State addressing repetitively flooded structures in its risk assessment. SEMA provides guidance and outreach to all state communities and informs local jurisdictions of the number of severe repetitive loss Properties.²⁷

Per Missouri’s 2018 State Hazard Mitigation Plan, the State of Missouri had 196 properties designated as Severe Repetitive Loss with total payments to property owners (building and contents) of more than \$35 million. These 196 SRL properties had 1,460 losses or an average of 7.4 losses for each SRL property. The breakdown of each county is included in Table 17 below.

²⁶ Missouri State Hazard Mitigation Plan, Page 3.106

²⁷ Missouri State Hazard Mitigation Plan, Page 4.37

Table 17: Missouri Severe Repetitive Loss Summary

County	Number of SRL Properties	Total Paid Losses	Sum of Average Payments (All Communities)
Jefferson	43	\$7,797,381	\$126,433
St. Charles	44	\$7,789,418	\$97,433
St. Louis	13	\$2,827,961	\$136,872
Phelps	10	\$2,435,446	\$116,280
Holt	8	\$1,714,593	\$71,441
Franklin	7	\$1,434,802	\$103,022
Taney	6	\$1,380,133	\$158,273
Cole	6	\$1,177,147	\$22,471
Gasconade	8	\$1,065,631	\$30,821
Pike	7	\$884,717	\$28,080
Lincoln	7	\$877,438	\$18,362
Newton	5	\$789,957	\$94,945
St. Francois	1	\$539,485	\$33,718
Pulaski	3	\$430,859	\$35,905
Carter	2	\$383,322	\$47,915
Cass	3	\$361,337	\$40,703
Clay	4	\$346,873	\$33,976
McDonald	2	\$337,822	\$84,455
Cape Girardeau	3	\$259,295	\$36,779
Boone	1	\$219,131	\$21,913
St. Genevieve	2	\$181,751	\$30,625
Andrew	1	\$134,321	\$33,580
Christian	1	\$85,082	\$17,016
Butler	1	\$83,777	\$20,944
Maries	1	\$76,195	\$19,048
Jasper	1	\$65,904	\$16,476
Jackson	1	\$64,466	\$13,893
Osage	1	\$52,823	\$8,804
Warren	1	\$50,096	\$14,774

State MID
HUD MID

Data from SEMA and Missouri State Hazard Mitigation Plan

Future Risk

With the prospect of climate change and increase in global temperatures, the state of Missouri is likely to see an increase in the pattern and frequency of floods across the state. In an examination on whether the magnitude and/or frequency of flood events is

remaining constant or has been changing over recent decades, strong evidence points to an increasing frequency of flooding²⁸.

The increased frequency in flooding results from projected changes in both seasonal rainfall and temperature across the state of Missouri. Over the last half century, average annual precipitation in most of the Midwest has increased by 5 to 10 percent²⁹. Although projections of overall annual precipitation in Missouri are uncertain, winter and spring precipitation are projected to increase, while summer precipitation may decrease³⁰ (Figure 19, Projected Change in Spring Precipitation). This indicates growing seasonal risks of flooding in winter and spring, absent mitigation actions.

Projected Change in Spring Precipitation

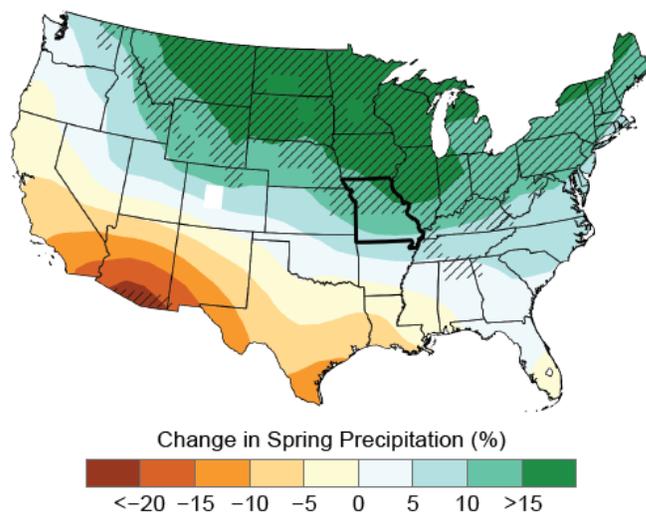


Figure 6: Projected change in spring precipitation (%) for the middle of the 21st century compared to the late 20th century under a higher emissions pathway. Hatching represents areas where the majority of climate models indicate a statistically significant change. Projected increases in spring precipitation are part of a large area of projected increases in the Northeast and Midwest. Source: CICS-NC, NOAA NCEI, and NEMAC.

²⁸ Mallakpour, I., Villarini, G. The changing nature of flooding across the central United States. *Nature Clim Change* 5, 250–254 (2015) doi:10.1038/nclimate2516

²⁹ EPA What Climate Change Means for Missouri <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-mo.pdf>

³⁰ NOAA National Centers for Environmental Information | State Summaries 149-MO. www.NCEI.NOAA.Gov | <https://Statesummaries.NCICS.Org/Mo> | Lead Authors: Rebekah Frankson, Kenneth E. Kunkel | Contributors: Sarah Champion, Brooke C. Stewart

Source: NOAA National Centers for Environmental Information | State Summaries 149-MO.
www.NCEI.NOAA.Gov | <https://Statesummaries.NCICS.Org/Mo> | Lead Authors: Rebekah Frankson, Kenneth E. Kunkel | Contributors: Sarah Champion, Brooke C. Stewart

Further, a study conducted by the World Meteorological Organization indicates that The Simple Daily Intensity Index (the total precipitation per year divided by the number of days with precipitation) on a US area-averaged basis, shows an upward trend and when precipitation does occur, it tends to be heavier³¹. Figure 20 depicts a daily intensity graph.

Figure 20: Daily Intensity of Precipitation Measured using the Simple Daily Intensity Index

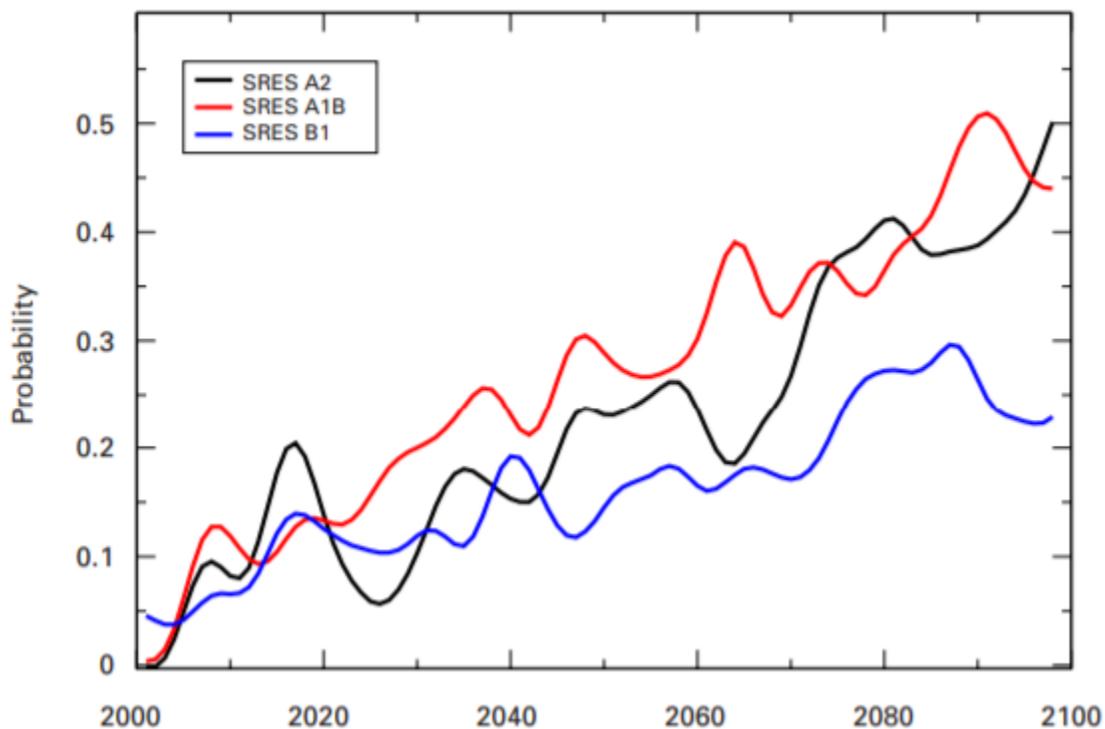


Image from: <https://public.wmo.int/en/bulletin/weather-and-climate-change-implications-surface-transportation-usa>

With the risk of increased severe rainfall events as noted above, Missouri's SHMP has also conducted an analysis using FEMA's Hazus modeling software to estimate potential losses where flood losses could occur and the degree of severity using a consistent methodology. The purpose of this analysis is to quantify risk in known flood-hazard areas, but also

³¹ McGuirk, Marjorie, Scott Shuford, Thomas C. Peterson, and Paul Pisano. "Weather and climate change implications for surface transportation in the USA." WMO bulletin 58, no. 2 (2009): 85.

estimate losses for areas where lesser streams and rivers exist but where flood hazard may not have been previously studied³² but may occur due to climate change. The statewide analysis utilized FIRM data, draft floodplain data, and Hazus-generated floodplain data in conjunction with residential structures from US Census data to estimate both the number of residential structures at risk of damage and the projected residential loss value expected during a 1-percent annual chance flood event. The results are mapped in Figure 21 and the top counties with loss are shown in Table XA and XB.

Figure 21: Projected Cost of Loss to Residential Structures Resulting from 1% Annual Flood

Projected Cost of Loss to Residential Structures as a Result of a 1% Annual Flood Event

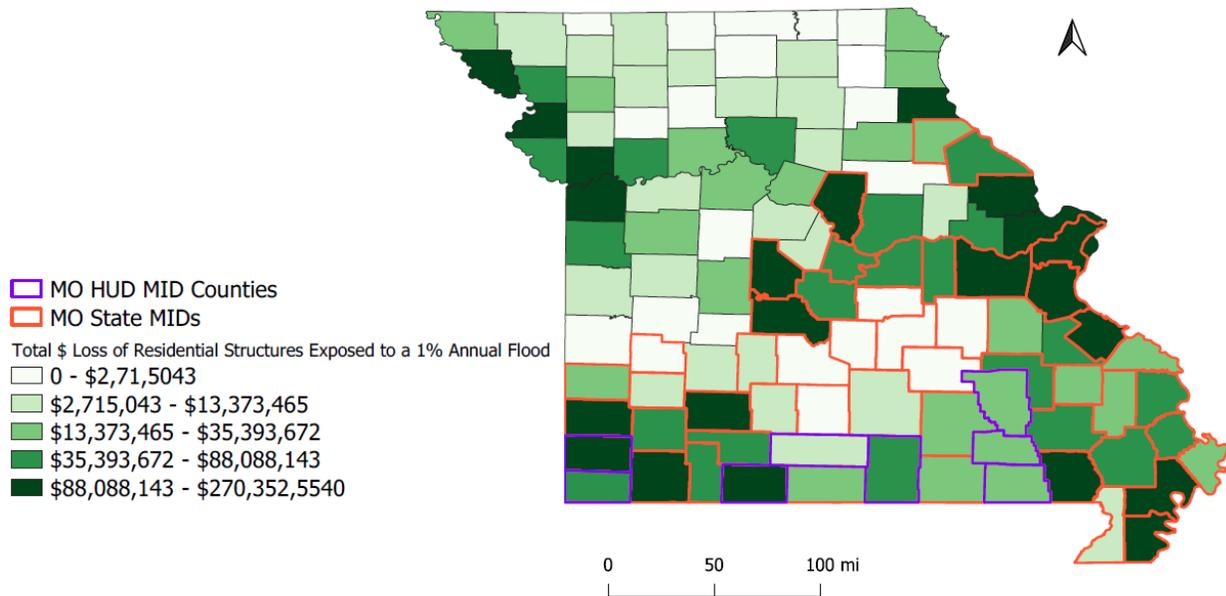


Table 18a: Total \$ Loss of Residential Structures Exposed to a 1% Annual Flood in HUD MIDs.

HUD MID Counties	
County	Total \$ Loss of Residential Structures Exposed to a 1% Annual Flood
Taney	\$239,482,799
Newton	\$149,877,828
Howell	\$54,137,634
Ripley	\$33,092,545
Reynolds	\$30,722,780

³² Missouri State Hazard Mitigation Plan, Page 3.109

HUD MID Counties	
Carter	\$22,852,496
Douglas	\$5,637,630

Table 18b: Total \$ Loss of Residential Structures Exposed to a 1% Annual Flood in State

State MID Counties (Top 10)	
County	Total \$ Loss of Residential Structures Exposed to a 1% Annual Flood
St Louis	\$2,703,525,540
Jefferson	\$958,407,803
Pemiscot	\$673,477,516
Butler	\$584,733,857
Franklin	\$297,298,075
Camden	\$252,163,261
New Madrid	\$219,784,761
Boone	\$202,290,325
Greene	\$130,296,313

Severe Winter Storm

Overview of Hazard

Severe winter weather refers to snowstorms, ice storms, extreme cold, freezing rain and high winds. Winter storms can affect any area of Missouri and per the 2018 State Hazard Mitigation Plan have a 100% probability with 233 events per year average³³. The SHMP also states that weather data indicates that Missouri counties north of the Missouri River receive an average annual snowfall of 18 to 22 inches and those south of the Missouri River see an annual average snowfall of 8 to 12 inches³⁴.

Data and Sources on Historical Impact on HUD and State MIDs

Winter storms are dangerous due to their impact on populations and bring the threat of loss of life by causing car accidents, hypothermia, frostbite, carbon monoxide poisoning, and heart attacks from overexertion³⁵.

The economic impact of severe winter storms in Missouri result from downed trees impacting electric power lines and poles, telephone lines, and communications towers,

³³ Missouri State Hazard Mitigation Plan, Page 3.321

³⁴ Missouri State Hazard Mitigation Plan, Page 3.322

³⁵ Snowstorms & Extreme Cold <https://www.ready.gov/winter-weather>

which also create a risk of fire. They also impede regular utility and city operations due to the immediate need of debris removal and landfill hauling³⁶

As part of the State Hazard Mitigation plan, historical information on severe winter weather events was obtained from the NCEI Storm Database and losses were presented on annual events for ice storms, heavy snow, blizzards, winter storms, and winter weather, respectively³⁷. Based on the analysis here, it was determined that ice storm events are the costliest winter related hazard impacting the state. The cost associated with property damages as a result of ice storm events is depicted in Table 19.

Table 19: Impact of Annual Ice Storm Events in Missouri 1996 - 2016

Annual Ice Storm Events in Missouri, 1996-2016					
Year	# of Events	Deaths	Injuries	Property Damages	Crop Damages
1996	46	0	0	4,235,000	0
1997	32	0	0	0	0
1998	40	0	0	0	0
1999	32	0	0	150,000	0
2000	37	0	0	10,000	0
2001	44	0	0	25,000	0
2002	32	0	0	\$32,437,000	0
2003	0	0	0	0	0
2004	24	0	0	0	0
2005	21	0	0	\$20,000	0
2006	30	0	0	\$10,000	0
2007	152	0	0	\$373,213,000	0
2008	94	0	0	0	0
2009	12	0	0	\$50,190,000	0
2010	1	0	0	0	0
2013	15	0	0	\$750,000	0
2014	0	0	0	0	0
2015	0	0	0	0	0
2016	0	0	0	0	0
Grand Total	612	0	0	\$461,040,000	0

³⁶ Missouri State Hazard Mitigation Plan, Page 3.321

³⁷ Missouri State Hazard Mitigation Plan, Page 3.322

Future Risk

In order to determine potential financial loss estimates resulting from severe winter weather in Missouri, the State analyzed historical property loss data to come to an annualized loss by county by utilizing historical loss data from the NCEI Storm Event Database for Blizzard, Heavy Storm Ice Storm, Winter Storm and Winter Weather for the period from 1996 to December 2016.³⁸ These annualized historical loss data should be considered as an indicator for future potential losses.

Figure 22: Annualized Winter Weather Related Property Loss
Annualized Winter Weather Related Property Loss

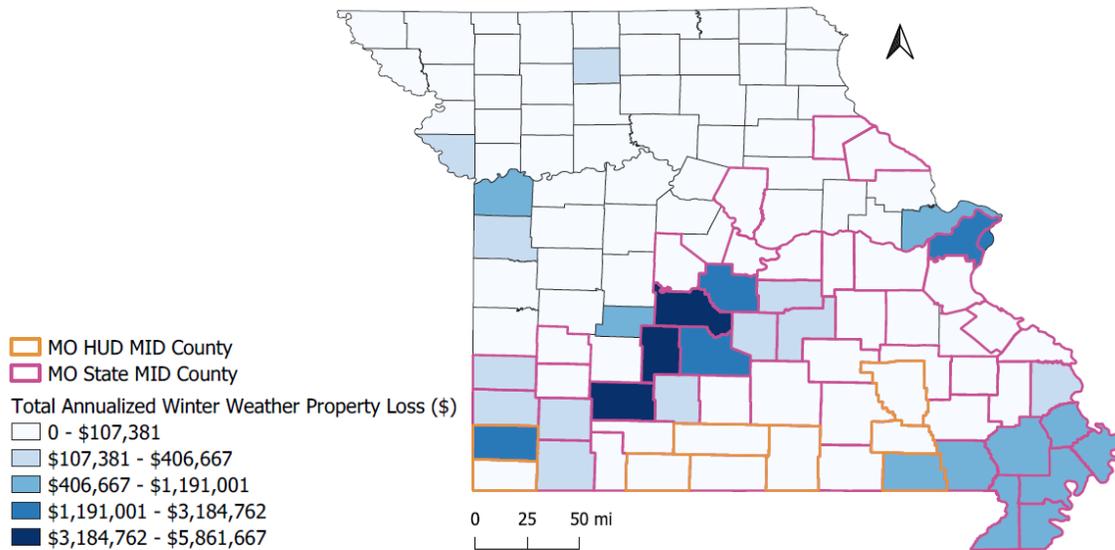


Table 20: Top 15 Annualized Property Loss from Winter Weather for State and HUD MID Counties

County	Total Annualized Winter Weather Property Loss (\$)
Greene	\$5,861,667
Camden	\$5,736,667
Dallas	\$5,011,429
Miller	\$3,184,762
St Louis	\$2,085,714
Newton	\$1,931,667
Dunklin	\$1,191,001
Pemiscot	\$1,191,001
Scott	\$1,035,905

³⁸ Missouri State Hazard Mitigation Plan, Page 3,348

County	Total Annualized Winter Weather Property Loss (\$)
New Madrid	\$1,033,810
Butler	\$990,476
Mississippi	\$985,714
Ripley	\$728,571
Pulaski	\$406,667

In addition, with changes in global climate and temperatures, Missouri has the potential to see a shorter overall winter season and fewer days of extreme cold³⁹.

Warmer winter temperatures may result in reduced lake ice cover leaving Missouri’s waterbodies more exposed to wind, evaporation and subsequent increase in precipitation which makes the event of freezing rain more likely⁴⁰. Additional precipitation during the winter season may contribute to an increase in ice storm damages as depicted historically in Table 20 above should rain conditions be ideal for freezing. In the event that precipitation increases but increased temperatures prevent freezing of rain, this may still contribute to an increased risk and severity of spring flooding discussed in the flooding section.

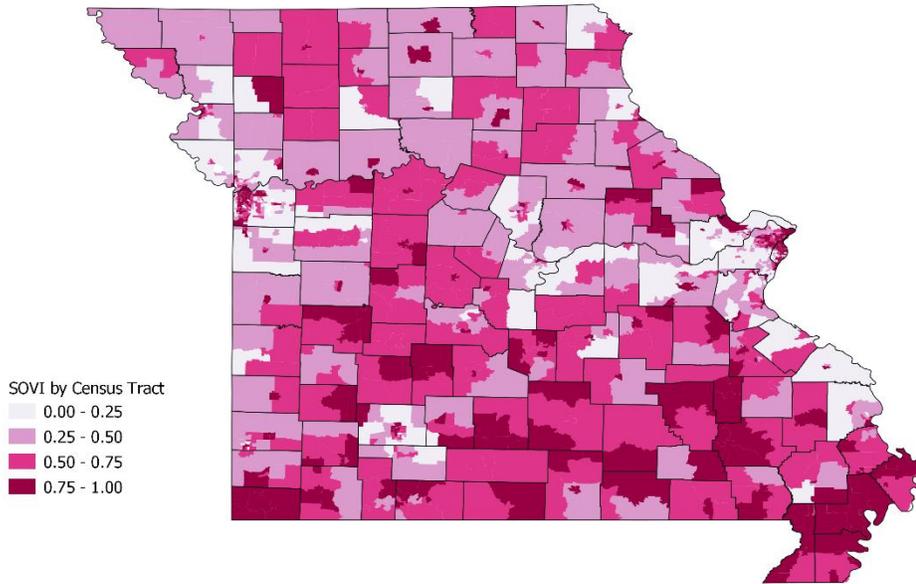
4.6 SOCIAL VULNERABILITY

In addition to environmental risks, a community’s ability to respond to and recover from disaster is also dependent on socioeconomic and demographic factors. CDC developed the social vulnerability index (SOVI) to quantify the aggregate the toll of these factors based on statistics such as poverty rate, access to transportation, and housing crowding. The index is based on four categories, which are then rolled up to a final 0-1 score, with 0 being less vulnerable and 1 being more vulnerable. In the map below, social vulnerability is higher in urban areas of Missouri as well as rural areas in the southern part of the state.

³⁹ Missouri State Hazard Mitigation Plan, Page 3.41

⁴⁰ Missouri State Hazard Mitigation Plan, Page 3.338

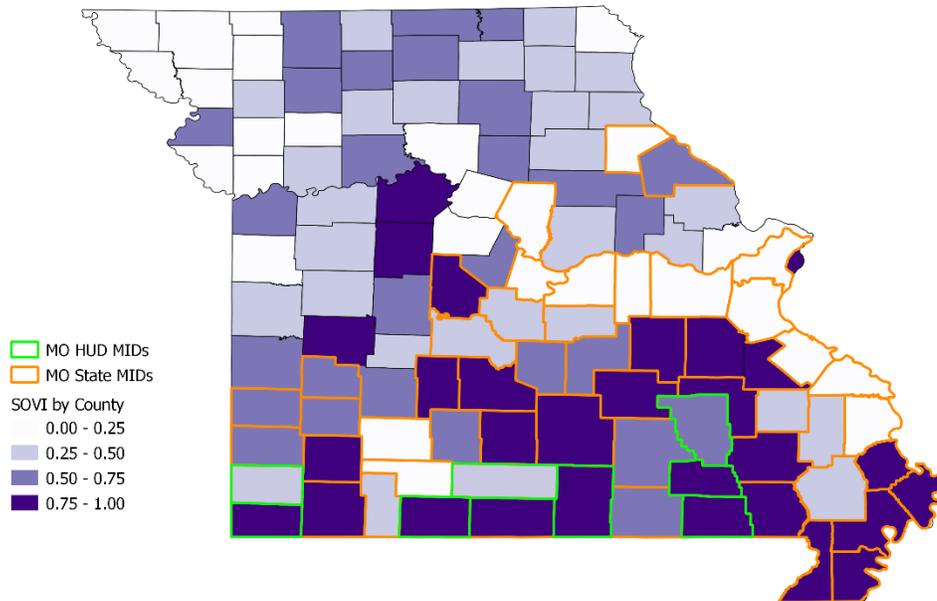
Figure 23: Missouri Social Vulnerability Index by Census Tract (2016)



Source: <https://svi.cdc.gov/>

If aggregated at the county level and compared with the HUD and State MIDs, it is notable that most of the counties in the highest vulnerability category are in the State or HUD MIDs.

Figure 24: Missouri Social Vulnerability Index (2016) by County with HUD and State MIDs



Source: <https://svi.cdc.gov/>

Figure 25: LMI Percent by Block Group

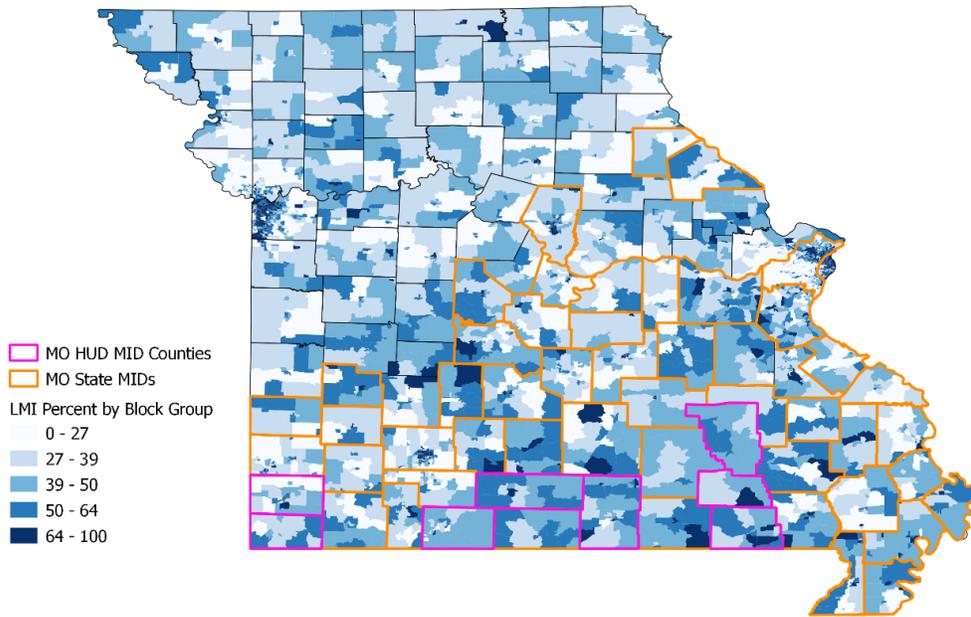


Table 21: Low- and Moderate-Income Percentage by County

Counties	LMI Percent
HUD MID Counties	
Douglas County	51.76%
Ripley County	50.74%
Carter County	46.55%
Howell County	46.13%
Reynolds County	45.96%
Taney County	43.49%
McDonald County	42.83%
Newton County	35.80%
State MID Counties	
Mississippi County	57.79%
Wright County	54.87%
Pemiscot County	53.31%
Dunklin County	52.57%
Cedar County	49.85%
Ozark County	49.28%
Oregon County	49.26%
Wayne County	48.66%
New Madrid County	47.66%
Franklin County	47.34%
Washington County	46.99%
Boone County	46.56%
Morgan County	46.35%
Barton County	46.34%
Dent County	45.62%
Crawford County	45.50%
Webster County	45.26%
Dallas County	44.82%
Greene County	44.65%
Butler County	44.38%
Texas County	44.25%
Iron County	44.19%
Dade County	44.14%
Madison County	43.21%
Barry County	42.74%

Counties	LMI Percent
Scott County	42.11%
Shannon County	42.11%
Phelps County	42.09%
Pike County	42.06%
Jefferson County	41.89%
Bollinger County	41.32%
Maries County	41.20%
Lawrence County	41.15%
Miller County	40.47%
Camden County	39.24%
Jasper County	38.48%
Stone County	38.25%
St. Louis County	37.85%
Cole County	37.34%
Pulaski County	37.24%
Cape Girardeau County	36.92%
Gasconade County	36.87%
Osage County	36.60%
Ste. Genevieve County	36.28%
Perry County	36.02%
Christian County	34.48%
Ralls County	34.25%

4.7 COMMUNITY LIFELINES

FEMA’s National Response Framework defines community lifelines as those services that enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security⁴¹. Lifelines are the integrated network of assets, services, and capabilities that are used day-to-day to support the recurring needs of the community⁴². The 7 Community Lifelines are defined as:

⁴¹ FEMA National Response Framework Fourth Edition October 28, 2019, Page ii, Retrieved from: https://www.fema.gov/media-library-data/1572366339630-0e9278a0ede9ee129025182b4dof818e/National_Response_Framework_4th_20191028.pdf

⁴² FEMA Community Lifelines Implementation Toolkit Version 2.0 November 2019, retrieved from: <https://www.fema.gov/media-library-data/1576770152678-87196e4c3d091f0319da967cf47ffd9c/CommunityLifelinesToolkit2.ov2.pdf>

1. Safety and Security
2. Communications
3. Food, Water, Sheltering
4. Transportation
5. Health and Medical
6. Hazardous Material (Management)
7. Energy (Power & Fuel)



Image from: <https://www.fema.gov/media-library-data/157677015267887196e4c3d091f0319da967cf47ffd9c/CommunityLifelinesToolkit2.ov2.pdf>

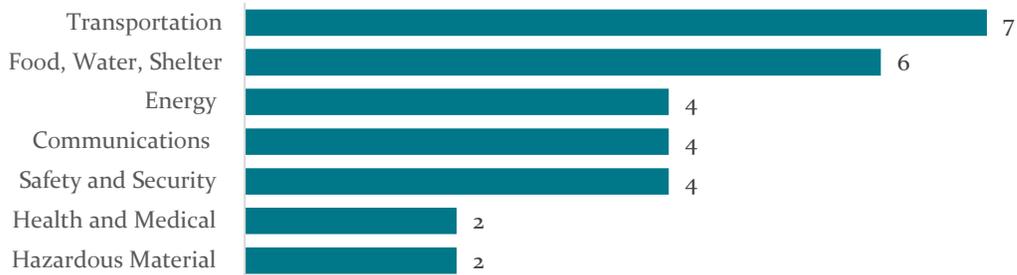
Stabilization of community lifelines in the wake of disasters is essential for communities to be able to not only respond to disasters in the immediate aftermath but restore a sense of normalcy once the disaster has gone. Mitigation activities that ensure that these critical areas are made more resilient and are able to reliably function during future disasters, can reduce the risk of loss of life, injury, and property damage and accelerate recovery following a disaster⁴³.

In December 2019, the MO-DED sent out a survey to each of the state’s COGs to gain information on the impacts to the 7 Critical Community Lifelines areas that were impacted in each planning commissions counties during the DR 4317 disaster events.

Regarding the impacts to community lifelines during the 2017 events the COGs with State/HUD MID counties reported that transportation was the most selected, followed by food, water and shelter. About half of respondents selected Energy, Communications and Safety and Security lifelines. COGs without MID counties had similar responses, although none selected Hazardous Material. The results are depicted below

⁴³ 45838 Federal Register / Vol. 84, No. 169 / Friday, August 30, 2019 / Notices

Figure 26: Results from 2019/2020 Missouri Council of Governments Survey (Appendix 1) on Effects of the 2017 Floods on Community Lifelines for COGs with State/HUD MID Counties



As part of the requirements set forth in the Federal Register Notice (84 FR 45838), this section quantitatively assesses the significant potential impacts and risks of hazards affecting the 7 FEMA defined critical service areas, or community lifelines.

Safety and Security

The Safety and Security lifeline is composed of services that protect the community. The components include law enforcement and security, fire services, search and rescue, government services and community safety. Disasters of any kind can greatly impact safety and security by limiting the capabilities of response activities such as impacting emergency operations, delivery of medical care, or impeding the ability to rescue those in life-threatening scenarios.

During the floods of DR-4317, the Governor of Missouri deployed the State Highway Patrol, the Missouri National Guard, Missouri Task Force 1, and water rescue teams on land, water, and sky to protect Missouri which resulted in 164 documented rescues and 128 documented evacuations⁴⁴. Ensuring this capacity is readily available will ensure that response times do not suffer, and communities can be properly secured during times of disaster.

Flooding can pose a great threat to the delivery of services offered by the maintenance and operation of a community's critical facilities. Especially when critical service facilities are located in areas of frequent impact such as Special Flood Hazard Areas. In February of 2019, Flash flooding from two creeks in Van Buren forced flooded the Van Buren Fire Station with at least 10 inches of water which caused damage to the building and equipment located inside⁴⁵. During the 2017 floods in the Bootheel region, emergency

⁴⁴ KY3 "Early estimate: Flood damage across Missouri will cost \$86 million" <https://www.ky3.com/content/news/flooding-costs-missouri-424447713.html>

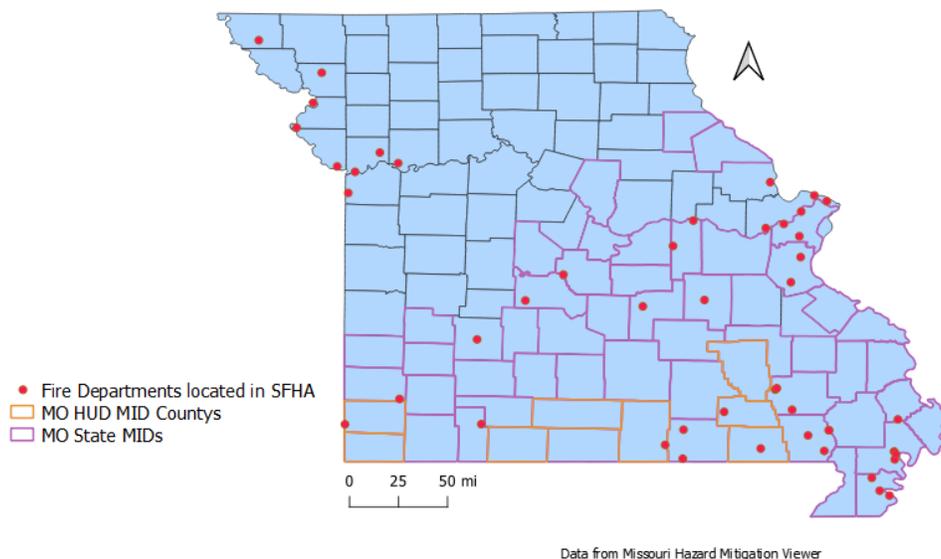
⁴⁵ KFVS 12 "Fire crews rescue couple during flash flooding; fire station floods too" From: <https://www.kfvs12.com/2019/02/07/fire-crews-rescue-couple-during-flash-flooding-fire-station-floods-too/>

responders were called for rescues and evacuations due to flooded roads. When roads were closed, response times of emergency responders increased. Potosi Fire Station was cut-off and/or flooded, which resulted in equipment being relocated. South Central Ozark region also reported that rescue services/capacities were maximized where flooding occurred.⁴⁶

Missouri has several fire departments that are located in a FEMA Special Flood Hazard Area.

Figure 27: Fire Departments in Special Flood Hazard Area

Fire Departments Located in Special Flood Hazard Area



Mitigation measures like resilient building construction ensure that critical facilities located in areas that are susceptible to damage from disaster are less impacted and able to respond to the community’s needs during disaster.

Communications

The Communications lifeline is composed of communications infrastructure, responder communications, alerts, warnings and messaging, financial systems and emergency dispatch. During times of disaster, communications are essential to relaying information and coordinating emergency response which are critical to preventing deaths and saving lives.

During ice storms during December 2006-January 2007, a lack of connectivity and communication left state and local government left thousands of citizens without power

⁴⁶ 2019/2020 Missouri Council of Governments Survey Response

for weeks. This led to the state establishing a coordinated conference call system for state and local emergency managers, along with the National Weather Service, so that every agency can be briefed by the National Weather Service on what to expect; and organizations can discuss needs and status of resources. From these conferences, a "situation report" is then published on SEMA's web site, which compiles the conference call and subsequent efforts to find resources needed requested and proves to be an invaluable way to communicate⁴⁷. Planning efforts and funding should ensure that the community is continually made aware of these public notices to better equip disaster preparedness and response.

In 2011 a deadly EF-5 tornado with winds of more than 200 mph took 161 lives in Joplin, MO. The catastrophic event prompted a wave of initiatives throughout the state to reduce risks to lives and damage to property in the path of another disaster, one of which was the evaluation and replacement of emergency sirens⁴⁸. Then, in May of 2019, a tornado cut a devastating path along Jefferson City and damaged residential structures, buildings, and downed power lines. Residents were given relatively short notice due to competing emergency efforts related to flooding and thunderstorms combined with the typically short warning period that tornados present. However, in the following days there were no confirmed deaths, which the state attributed to the effective warning communications including use of the sirens - one before the tornado arrived in Jefferson City and another as it touched the ground⁴⁹. This increased mitigation to communication lifelines shows the importance of communication during disaster events as a means to prevent loss of life and ensure residents able to be informed and respond in a timely manner.

Food/Water/Shelter

The Food, Water and Shelter lifeline is comprised of food supply chains, water and utilities (waste and drinking), housing, shelters, agriculture and livestock. These are not only fundamental operations for daily life, but critical to preventing loss of life in the wake of disaster. Disaster events can put a significant strain on the ability to maintain the supply chain of food, potable water, and shelter to residents. Without proper mitigation measures, this strain will feasibly increase as projected flood risk increases with the prospect of climate change.

Food

Nearly all of Missouri's agricultural land is susceptible to flooding and has already been affected by 2019's heavy precipitation. The agricultural impacts of this wet weather have been numerous, including poor corn stands, nitrogen fertilizer loss, poor weed control

⁴⁷ <https://www.govtech.com/public-safety/Coordinated-Communications-Eases-Impact-of-Midwest.html>

⁴⁸ New Sirens Save Lives During 2019 Missouri Tornado, <https://www.fema.gov/news-release/2019/08/22/new-sirens-save-lives-during-2019-missouri-tornado>

⁴⁹ <https://www.kansascity.com/news/state/missouri/article230738659.html>

and delayed soybean planting⁵⁰. This becomes problematic for long term recovery with regard to crop management and food stabilization after disaster events.

In addition, disaster events can impact communities' emergency food supply at the local level. In the 2017 floods in the Bootheel region, foodbanks were depleted in the flooded area. In one county in the Ozark Foothills region, the only grocery store in the entire county was flooded, making the purchase of food and clean drinking water difficult at best.⁵¹

Water

Disaster events can impact the ability to provide clean running water. Flood events bring excessive levels of turbidity, fine particles in the water, which can carry bacteria, viruses and parasites that cause illness. Many municipal drinking water and wastewater facilities that serve Missouri communities along the Missouri and Mississippi rivers and their tributaries are affected by flooding events⁵². Record flooding along the Missouri River in March of 2019 impaired treatment of drinking supplies in Kansas City. This was due to broken pumps at wastewater treatment plants located upstream that were submerged by floodwater⁵³. During the floods of 2017, Southwest Missouri COG reported wastewater treatment plants, lift stations, and well pumps were threatened or flooded. Well/pump housing providing potable water to Fort Leonard Wood was under water and the Fort was only hours away from being without water ⁵⁴ Utilizing mitigation funds to increase resilience of infrastructure systems related to water supply would ensure continued ability to supply clean water to Missouri's residents.

Shelter

Disaster events both impact residential shelter by destroying homes but also can put a strain on dedicated storm shelters. The Joplin tornado in May 2011 damaged 553 business structures and nearly 7,500 residential structures; with over 3,000 of those residences were heavily damaged or totally destroyed⁵⁵. Joplin school storm shelters took in 1,500-1,700 occupants when the tornado struck⁵⁶.

⁵⁰ <https://extension2.missouri.edu/programs/flood-resources/crops-and-soils-flood-resources>

⁵¹ 2019/2020 Missouri Council of Governments Survey

⁵² <https://dnr.mo.gov/pubs/pub2753.htm>

⁵³ "Flooding impairs drinking water treatment for Kansas City, Missouri", Karen Dillion from: <https://www.reuters.com/article/us-usa-weather/flooding-impairs-drinking-water-treatment-for-kansas-city-missouri-idUSKCN1R4oND>

⁵⁴ 2019/2020 Missouri Council of Government Survey Response

⁵⁵ <https://www.nist.gov/el/disaster-resilience/joplin-missouri-tornado-2011>

⁵⁶ "Missouri Schools Build Safe Rooms for Shelter from Tornadoes"

<https://www.fema.gov/news-release/2019/08/28/missouri-schools-build-safe-rooms-shelter-tornadoes>

Transportation

The Transportation lifeline refers to the highways, roadways, bridges, and infrastructure that make transit possible on land, water and in the air. This includes mass transit like buses and ferries, railway (freight or passenger), aviation (commercial and military) and maritime (waterways and ports). Transportation systems in Missouri provide critical lifeline services and are highly important for response and recovery operations before, during and after disaster events. Transportation networks are critical in their relation to the other critical service areas listed here. For example, in order to provide food or medical supplies when they are critically needed, transportation networks like roadways need to be passable. Likewise, disrupted transportation networks can block public access to essential services, including hospitals, and support from fire department and police. In Missouri, flooding, tornadoes, severe thunderstorms and winter storms often damage transportation infrastructure and impede services that utilize them.

For example, flash flooding along the Meramec River damaged structures, roads, and bridges⁵⁷. During the 2017 floods, 10 of 11 COGs surveyed reported that transportation was adversely affected. For example, Cedar county experienced road closures, and incurred thousands of dollars in damage to county gravel roads due to the roads being washed out. Major roads were also closed in Phelps County, Maries County and Gasconade County. All bridges across the Gasconade River in the Meramec Region were closed at some point; all counties had local roads and bridges that were damaged and closed.⁵⁸ These impacts have both near-term consequences for urgently needed relief and recovery services, and long-term repercussions for local economies and community life.

The condition of transportation infrastructure is a critical factor in assessing risk. Roads and bridges that are in good repair withstand flooding and severe weather to a greater degree than infrastructure that has deteriorated. The state's multi-modal transport network is essential for both passenger and freight movement, and loss of connectivity in goods movement can have cascading impacts on local and regional communities. Infrastructure that is sited and constructed with future severe weather conditions in mind can help avoid future disruptions and reduce future costs of repairs.

The 2018 Missouri Department of Transportation (MoDOT) Long Term Plan Update⁵⁹ reported that "The number of poor condition bridges increased from 817 in 2012 to 883 in 2016." The MoDOT Asset Management Plan (TAMP) documents the condition of roads and bridges, to help identify needs and prioritize investments. The recently published 2019

⁵⁷ Winston, W. E., and R. E. Criss. 2003. Flash Flooding in the Meramec Basin, May 2000. In *At the Confluence: Rivers, Floods, and Water Quality in the St. Louis Region*, edited by R.E. Criss and D. A. Wilson. St. Louis, MO: Missouri Botanical Garden Press

⁵⁸ 2019/2020 Missouri Council of Government Survey Response

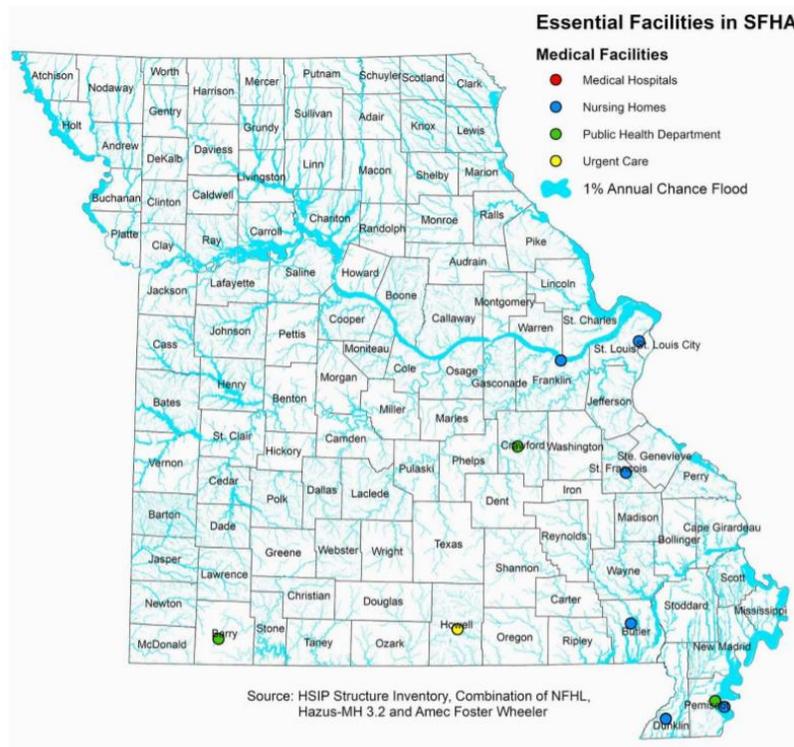
⁵⁹ Missouri Department of Transportation. 2019 Long Range Transportation Plan Update: Technical Memorandums. 2018.

MoDOT TAMP reports that the state is “steadily losing ground on our number of poor bridges with the count over 900” and notes that Missouri has over 1,200 structures with a weight restriction.⁶⁰ This Action Plan will align with MoDOT’s strategic priorities as it continues to invest in repairs and new construction,

Health and Medical

The Health and Medical lifeline includes medical care, patient movement, fatality management, public health and medical supply chain, all complex systems which can be affected by disasters. Severe thunderstorms or tornadoes can cause power outages that impact hospitals and other medical facilities, underscoring the need for backup generation capabilities to preserve essential function. Flooding can also directly impact medical facilities or transportation to those facilities. In the Ozark Foothills region during the floods of 2017, patients could not travel to medical appointments and some doctor's offices were closed.⁶¹ The map below shows ten essential medical facilities that are especially vulnerable to flood loss as they are located within the Special Flood Hazard Area, nearly all of which are in State or HUD MID counties.

Figure 28: Essential Facilities in the Special Flood Hazard Area



⁶⁰ Missouri Department of Transportation. MoDOT’s National Highway System Transportation Asset Management Plan, August 2019.

⁶¹2019/2020 Missouri Council of Government Survey Response.

Image from Missouri State Hazard Mitigation Plan, Page 7.107 Retrieved from: https://sema.dps.mo.gov/docs/programs/LRMF/mitigation/MO_Hazard_Mitigation_Plan2018.pdf

Hazardous Material (Management)

Floodwaters in Missouri often have the potential to interact with hazardous materials. This has prompted the evacuation of many citizens near such materials stored in large containers that could break loose or puncture as a result of flood activity⁶².

The Union Pacific route between St. Louis and Kansas City and the Norfolk Southern route from Hannibal to Kansas City are both used for large radioactive material shipments⁶³.

Energy (Power and Fuel)

The Energy lifeline is perhaps one of the most critical as it includes the power grid and its critical facilities, including fuel supply lines.

Figure 29:
Energy Lifeline

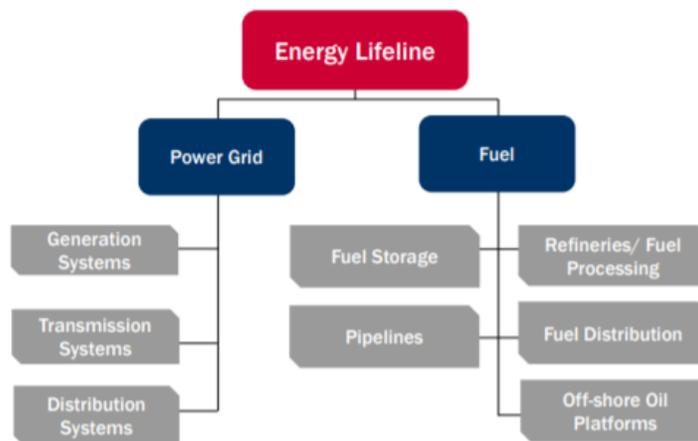


Image from FEMA's Community Lifeline Implementation Toolkit v2.0

Damage to power infrastructure often results in loss of power supply, which can cause loss of life or greatly impede other critical service areas such as communications. Examples of events over the past two decades illustrate the hazard.

⁶² Missouri State Hazard Mitigation Plan, Page 3.121

⁶³ Missouri State Hazard Mitigation Plan, Page 3.468

In January 2002 a major ice and snow storm blasted much of northwest, northern and central Missouri and caused at one point 409,504 total customers to be without electrical power, with some residents without power up to two weeks.⁶⁴

In January 2007 a major ice storm in southwest Missouri, including the Springfield metro area caused power outages which occurred for over three weeks in many areas⁶⁵.

In May 2011 an EF-5 tornado with wind speeds in excess of 200 mph caused major damage or complete destruction across Joplin, Mo. Energy infrastructure like the Cummins generator building, electric power company sub-station, major cell and power transmission towers were damaged as a result of this storm⁶⁶.

During the floods of 2017, levee districts in the Bootheel region were forced to run pumps more frequently than normal, which drove up fuel costs⁶⁷. Also, in South Central Ozark region, power lines were down in areas of high straight-line winds and thunderstorms and substations were submerged underwater.

Power outages also create an increased risk of fire, as home occupants use alternative fuel sources (wood, kerosene, etc. for heat and fuel burning lanterns or candles for emergency lighting).⁶⁸

Severe weather events have impacted both the generation and transmission of power. Under future climate conditions, the scale and frequency of these impacts may increase. In addition, increasing temperatures can reduce generation capacity by reducing the efficiency of thermal generation and increasing fuel needs.⁶⁹

Increasing periods of extreme heat can also be expected to increase demand for electricity, placing more stress on the grid and exacerbating energy requirements in the region. Loss of air conditioning capacity can be life threatening for vulnerable populations, impacting hospitals and other health facilities. This underscores the critical importance of reliable energy service to the health and safety of communities.

4.8 Risk Assessment Conclusion

The State of Missouri has taken a data-driven approach to determining the highest risks to its residents and businesses. Based on the Risk Analysis in this section, the data suggests

⁶⁴ Missouri State Hazard Mitigation Plan 3.323

⁶⁵ Missouri State Hazard Mitigation Plan 3.323

⁶⁶ https://www.weather.gov/sgf/news_events_2011may22

⁶⁷ 2019/2020 Missouri Council of Government Survey Response

⁶⁸ Missouri State Hazard Mitigation Plan, Page 3.321

⁶⁹ U.S. Department of Energy Office of Energy Policy and Systems Analysis. Climate Change and the U.S. Energy Sector: Regional Vulnerabilities and Resilience Solutions, October 2015.

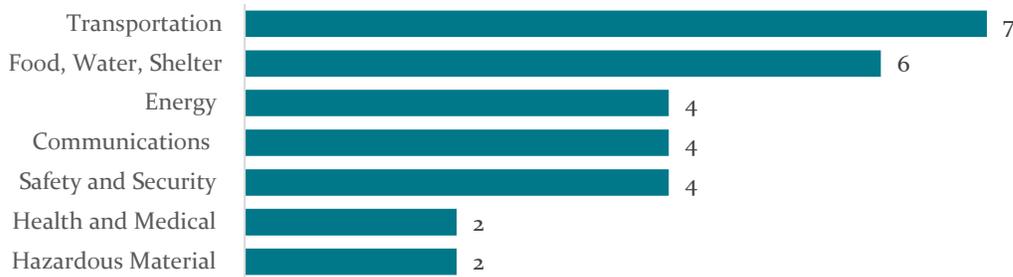
(based on total number of high-ranking hazards in each of Missouri’s county local hazard mitigation plans), the top risks impacting the state in order are:

1. Thunderstorms
2. Tornadoes
3. Flooding (riverine and flash)
4. Severe winter weather

In addition to assessing the hazards identified in the county’s hazard mitigation plans, the MO-DED sent surveys to all of the regional planning commissions in the Missouri Council of Governments (COGs) and businesses in December 2019 to obtain further data on how these hazards impact the 7 Critical Community Lifelines during the 2017 disaster events.

Regarding the impacts to community lifelines during the 2017 events the COGs with State/HUD MID counties and businesses reported that transportation as the highest impact, followed by food, water and shelter. About half of respondents selected Energy, Communications and Safety and Security lifelines. The results are depicted below from the COGs survey:

Results from 2019/2020 Missouri Council of Governments Survey (Appendix 1) on Effects of the 2017 Floods on Community Lifelines for COGs with State/HUD MID Counties



The State of Missouri has determined based on the analysis of the Risk-Based Mitigation Needs Assessment and reported impacts to the 7 Critical Community Lifelines from local communities that the following activities will be implemented to advance long-term resiliency for future disasters in the HUD and State MIDs resulting from the 2017 disasters. These programs align with other planned capital improvements and promote community-level and regional planning. The CDBG-MIT Activities will build upon planning investments made with the CDBG-DR funds previously allocated for regional planning after the 2017 disaster.

5. CDBG-MIT Program Design

The State of Missouri has looked to the eligible activities that can be funded with the CDBG-MIT funds and aligned their program design to address the highest four hazards for the HUD and State MIDs. The CDBG-MIT Program activities include:

1. **Mitigation Planning and Capacity Building** – promote planning to increase resiliency through updating local hazard mitigation plans, codes and land use regulations to encourage wind engineering measures and construction techniques, increase participation in NFIP, and provide staffing for planning and management capacity to local governments to implement their mitigation activities. Given the success of the use of CDBG and CDBG-DR funds for planning purposes, the CDBG-MIT program will allow for planning costs to be included to further develop both pre- and post-disaster plans for the communities identified in the most impacted and distressed areas (5 zip code areas) as well as the State’s most impacted and distressed areas under DR-4317. The plans will be required to take into consideration and complement the existing hazard mitigation plans, the THIRA (Threat and Hazard Identification and Risk Assessment), the emergency management plan and local land use, comprehensive and strategic plans.
2. **General Infrastructure** – increase resiliency and mitigate for future flooding by designing and implementing updated roads, bridges, culverts, etc. the CDBG-MIT funds will allow local communities to fund previously identified infrastructure mitigation needs and/or identify infrastructure mitigation needs that will reduce or eliminate damages and loss of life and property. Eligible projects will ensure engineering designs include features that mitigate weaknesses that contributed to the previous infrastructure failure.
3. **Public Facility Hardening** – increase resiliency and mitigation for future impacts from disasters for public facilities, public shelters, and all critical public facilities such as potable water facilities, wastewater treatment facilities, etc. CDBG-MIT funds will allow local communities to fund previously identified public facility mitigation needs and/or identify public facility mitigation needs that will harden the facility and reduce or eliminate damages and loss of life and property. Eligible projects will ensure that engineering designs include features that mitigate against current and future disasters.
4. **Critical Facility Generators** – increase resiliency for critical public facilities such as fire and police stations, shelters, hospitals, etc. The CDBG-MIT funds will allow local communities to identify critical facilities necessary to support community lifelines and install generators that will assist with reducing damages and loss of life. The generators will be permanent fixtures integrated into the broader systems to ensure continuity of services. Portable generators will not be eligible.
5. **Warning Systems** – increase resiliency and safety from future severe weather by installing Warning Systems in vulnerable communities. The CDBG-MIT funds will allow local communities to identify areas of vulnerable populations and install

warning systems necessary to assist with reducing damages and loss of life. Warning systems can include text alerts and other means of reaching the community to notify residents of hazardous conditions.

5.1 PROGRAM/PROJECTS DESCRIPTION

The State of Missouri has determined that all proposed mitigation activities are informed based on the Risk-Based Needs Assessment and meet the HUD requirements for mitigation activities including:

1. Meets the definition of a mitigation activity by increasing resilience to disasters and will reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.
2. Each proposed mitigation activity addresses the current and future risks identified in the Risk-Based Needs Assessment discussed in Chapter 4 of this Action Plan.
3. Are CDBG-eligible activities under title I of the Housing and Community Development Act of 1974 or HCDA or otherwise eligible pursuant to a waiver or alternative requirement.
4. Meets a national objective, including additional criteria for mitigation activities and Covered Projects.

Table 22: CDBG-MIT Mitigation Activities Alignment with Risk-Based Needs Assessment

Mitigation Activity	1. Meets Mitigation Definition	2. Current & Future Risk Addressed	3. CDBG Eligible Activity	4. National Objective
Mitigation Planning: Plans to upgrade building codes or regional land use plans, local HMP, feasibility plan, etc. to mitigate floods, severe storms, and tornadoes	Creates resiliency by requiring elevation and other mitigation against future floods and severe storms to reduce or eliminate damages and loss of life and property	Develop plans to address Flooding, Severe Storms, and Tornadoes. Create resiliency by requiring building and land use codes to mitigate against severe storms and tornadoes.	Planning HCDA – 105(a)(12)(A)	Planning and Administration: 24 CFR 483(f) or 24 CFR 483(b)(5) [if plan benefits 51% or more LMI]
Capacity Grants: Additional staffing capacity to support subrecipient’s implementation of their mitigation activity	Provide subrecipients with the capacity to carry out management, coordination, and monitoring of mitigation activities	Additional staff capacity ensures that the CDBG-MIT funded activities are implemented, and resiliency is increased in the community.	Capacity Building HCDA – 105(a)(12)(B)	Planning and Administration: 24 CFR 483(f)

Mitigation Activity	1. Meets Mitigation Definition	2. Current & Future Risk Addressed	3. CDBG Eligible Activity	4. National Objective
	necessary for effective planning and implementation.			
NFIP Coordinator: State staff position to coordinate with non-NFIP counties to facilitate participation	Counties participating in the NFIP program are more resilient against future flooding and property loss.	25% of counties are not NFIP participants. Participation has potential to lower flood insurance rates by increasing CRS score.	Capacity Building HCDA – 105(a)(12)(B)	Planning and Administration: 24 CFR 483(f)
DED Planning: Allows MO-DED to develop Risk Assessments, Action Plans, and Action Plan amendments for the CDBG-MIT funds.	CDBG-MIT funds cannot be expended until the State completes a HUD approved Risk Assessment and CDBG-MIT Action Plan.	CDBG-MIT Action Plan includes the State’s Risk-Based Needs Assessment and programs and funding designed to address those risks	Planning HCDA – 105(a)(12)(A)	Planning and Administration: 24 CFR 483(f)
General Infrastructure Increase resiliency for bridges, roads, drainage, etc.	Increasing resiliency for transportation infrastructure mitigates against future floods and severe storms to reduce or eliminate damages increasing safety and preventing loss of life and property.	Local communities in the HUD and State MIDs lost access during the 2017 disasters when roads, bridges, and other infrastructure were damaged by floods and severe weather.	Public Facilities and Improvements HCDA – 105(a)(2)	Low-Mod Area Benefit: 24 CFR 570.483(b)(1)(i)) Urgent Need: 24 CFR 570.483(d)
Public Facility Hardening: Harden and increase resilience for fire & police departments, water and wastewater treatment facilities, emergency shelters, etc.	Increasing resiliency for Public Facilities mitigates against future floods and severe storms to reduce or eliminate damages increasing safety and preventing	Local communities in the HUD and State MIDs suffered loss of public facilities due to flooding and severe weather.	Public Facilities and Improvements HCDA – 105(a)(2)	Low-Mod Area Benefit: 24 CFR 570.483(b)(1)(i)) Urgent Need: 24 CFR 570.483(d)

Mitigation Activity	1. Meets Mitigation Definition	2. Current & Future Risk Addressed	3. CDBG Eligible Activity	4. National Objective
	loss of life and property.			
Critical Facility Generators Install generators to critical facilities to ensure local governments have access to power throughout an emergency when local sources or power our out.	Installation of generators to the structures of critical public facilities (e.g., potable water facilities, wastewater facilities, police and fire departments, emergency shelters, etc.) increases safety and helps prevent loss of life and property.	Local communities in the HUD and State MIDs suffered power outages during the 2017 disasters.	Public Facilities and Improvements HCDA – 105(a)(2)	Low-Mod Area Benefit: 24 CFR 570.483(b)(1)(i)) Urgent Need: 24 CFR 570.483(d)
Warning Systems Warning systems to alert communities when severe weather or flooding is imminent.	Warning systems increase a community’s ability to seek shelter and protect property in advance of severe weather and tornadoes thus increasing safety and preventing loss of life.	Many communities within the HUD and State MIDs do not have warning systems.	Public Facilities and Improvements HCDA – 105(a)(2)	Low-Mod Area Benefit: 24 CFR 570.483(b)(1)(i)) Urgent Need: 24 CFR 570.483(d)

Urgent Need National Objective for Mitigation

The Appropriations Act directs the Department to allocate CDBG–MIT funds to grantees that received CDBG–DR funds to assist in recovery from major federally declared disasters occurring in 2015, 2016 and 2017. To reflect the direction of the Appropriations Act to allocate funds to grantees recovering from recent disasters and to address the demonstrable need for significant mitigation improvements by those grantees, the Department is waiving the criteria for the urgent national objective as provided at 24 CFR 570.208(c) and 24 CFR 570.483(d) and is establishing an alternative requirement to include new urgent need national objective criteria for CDBG–MIT activities. To meet the alternative criteria for the urgent need mitigation (UNM) national objective, each grantee

must document that the activity: (i) Addresses the current and future risks as identified in the grantee's Mitigation Needs Assessment of most impacted and distressed areas; and (ii) will result in a measurable and verifiable reduction in the risk of loss of life and property.

The State of Missouri will prioritize LMI beneficiaries to the greatest extent possible and will ensure meeting or exceeding the 50% expenditure requirement for LMI activities. The UNM national objective will be used as described below and result in measurable and verifiable reduction of the risk of loss of life and property as follows:

- Infrastructure and public facility mitigation will keep roads and bridges operating in future disaster events of similar nature as identified in the Risk Assessment allowing emergency responders to reach areas residents and save lives.
- Critical facility generators will keep critical public facilities (e.g., hospitals, shelters, police and fire departments, etc.) open and operating that provide services to the residents throughout a community allowing for verifiable and measurable reduction of the risk of loss of life and property.
- Warning systems will alert residents of impending hazardous conditions that will allow them to take safety precautions and secure property in advance of the hazardous conditions identified in the Risk Assessment resulting.

Covered Projects

In the CDBG-MIT FRN, a Covered Project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million of CDBG funds regardless of source (CDBG-DR, CDBG-National Disaster Resilience (NDR), CDBG-MIT, or CDBG)). The State of Missouri does not anticipate any projects that meet the definition of a covered project. If it is determined that a project will meet the definition of a Covered Project, the State will include the Covered Project in a substantial Action Plan amendment and follow the public hearing process before committing to funding.

5.2. Elevation and Construction Standards

Elevation Standards

The following elevation standards apply to new construction, repair of substantial damage, or substantial improvement of structures located in an area delineated as a flood hazard area or equivalent in FEMA's data source identified in 24 CFR 55.2(b)(1). All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the 100-year (or 1 percent annual chance) floodplain that receive assistance for new construction, repair of substantial damage, or substantial improvement, as defined at 24 CFR 55.2(b) (10), must be elevated with the lowest floor, including the basement, at least two feet above the base flood elevation.

Mixed-use structures with no dwelling units and no residents below two feet above base flood elevation, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above base

flood elevation. Please note that grantees should review the UFAS accessibility checklist available at: <https://www.hudexchange.info/resource/796/ufasaccessibilitychecklist/> and the HUD Deeming Notice, 79 FR 29671 (May 23, 2014) to ensure that these structures comply with accessibility requirements.

All Critical Actions, as defined at 24 CFR 55.2(b)(3), within the 500-year (or 0.2 percent annual chance) floodplain must be elevated or floodproofed (in accordance with the FEMA standards) to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Critical Actions are defined as an “activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property.”

For example, critical actions include hospitals, nursing homes, police stations, fire stations and principal utility lines. Applicable State, local, and tribal codes and standards for floodplain management that exceed these requirements, including elevation, setbacks, and cumulative substantial damage requirements, must be followed.

5.3 CONSTRUCTION STANDARDS

Resilient Home Construction Standard

The State of Missouri places particular emphasis on quality, durability, energy efficiency, sustainability, and mold resistance when scoping materials for construction.

Subrecipients are encouraged to incorporate a Resilient Home Construction Standard and meet an industry recognized standard such as those set by the FORTIFIED Home™ Gold level for new construction of single- family, detached homes; and FORTIFIED Home™ silver level for reconstruction of the roof, windows and doors; or FORTIFIED Home™ Bronze level for repair or reconstruction of the roof; or any other equivalent comprehensive resilient or disaster resistant building program. Further, grantees are strongly encouraged to meet the FORTIFIED Home™ Bronze level standard for roof repair or reconstruction.

FORTIFIED Home™ is a risk-reduction program providing construction standards for new homes and retrofit standards for existing homes, which will increase a home’s resilience to natural hazards, including high wind, hail, and tropical storms. Insurers can provide discounts for homeowner’s insurance for properties certified as FORTIFIED. Grantees should advise property owners to contact their insurance agent for current information on what discounts may be available. More information is also available at <https://disastersafety.org/fortified/fortifiedhome/>.

Green Building Requirements

The State of Missouri strongly encourages subrecipients to meet the Green Building Standard in this subparagraph for:

- All new construction of residential buildings and
- all replacement of substantially damaged residential buildings. Replacement of residential buildings may include reconstruction (i.e., demolishing and rebuilding a housing unit on the same lot in substantially the same manner) and may include changes to structural elements such as flooring systems, columns, or load-bearing interior or exterior walls.

For purposes of this Action Plan, the Green Building Standard means that the State of Missouri and its subrecipients will consider meeting one of the following industry recognized standards for all construction covered above through implementation of one or more of the following programs:

- ENERGY STAR (Certified Homes and Multifamily High-Rise),
- Enterprise Green Communities,
- LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development),
- ICC-700 National Green Building Standard,
- EPA Indoor AirPlus (ENERGY STAR a prerequisite) or
- any other equivalent comprehensive green building program acceptable to HUD.

Subrecipients should identify, in each project file, which Green Building Standard will be used, if any, on any building covered above.

5.4 CDBG-MIT PROGRAM BUDGET

The CDBG-MIT program budget is based on the FRN requirements which states that 50% of CDBG-MIT funds must be expended in the HUD identified MIDs and the remaining 50% may be expended in the State identified MIDs. The Table below lists the Programs and Activities determined based on the Risk-Based Needs Assessment, the percent of the total CDBG-MIT budget that each activity will receive, and the total amounts for each activity allocated to the HUD and State MIDs.

Table 23: CDBG-MIT Program Budget and Eligible Applicants

Program	Allocation	% Total Funds	HUD MIDs	State MIDs	Max Award	Eligible Applicants
Infrastructure	\$33,273,600	80%	\$16,636,800	\$16,636,600		
• General Infrastructure	\$13,309,440	32%	\$ 6,654,720	\$ 6,654,720	\$2.5M	Units of Local Government
• Public Facility Hardening	\$13,309,440	32%	\$ 6,654,720	\$ 6,654,720	\$5M	Units of Local Government

Program	Allocation	% Total Funds	HUD MIDs	State MIDs	Max Award	Eligible Applicants
• Generators for Critical Facilities	\$ 3,327,360	8%	\$ 1,663,680	\$ 1,663,660	\$50K	Units of Local Government
• Warning Systems	\$ 3,327,360	8%	\$ 1,663,680	\$ 1,663,660	\$50K	Units of Local Government
Planning and Capacity Grants	\$ 6,238,800	15%	\$ 3,119,400	\$ 3,119,400		
• Mitigation Planning	\$ 3,119,400	7.5%	\$ 1,559,700	\$1,559,700	\$150K	Units of Local Government and COGs
• Capacity Grants	\$ 1,934,028	4.6%	\$ 967,014	\$ 967,014	\$200K	Units of Local Government and COGs
• NFIP Coordinator	\$ 249,552	.6%	NA	NA	NA	NA
• DED Planning	\$935,820	2.3%	NA	NA	NA	NA
DED Administration	\$2,079,600	5%	NA	NA	NA	NA
	41,592,000	100%	\$19,163,514	\$19,163,514		

5.6 METHOD OF DISTRIBUTION

Missouri will use a Method of Distribution that allows eligible cities, counties, and COGs to apply for funds from the CDBG-MIT Program under a competitive process for each Program Category which will be established after HUD’s final approval of the CDBG-MIT Action Plan. Upon receipt of CDBG-MIT award, the unit of local government is the administering entity for program activities. The State will provide training and technical assistance.

Federal Priority Funding – Distribution Ratios

HUD has stated in the FRN that 50% of all funds shall be expended in the HUD MID zip codes and counties and all activities must meet the definition of mitigation. The 5 zip code areas are:

- 63935 – Doniphan area
- 63965 – Van Buren area
- 64850 – Neosho area
- 65616 – Branson area
- 65775 – West Plains area

The remaining 50% of the funds are available to the State MID counties with a presidential declaration under DR-4317 and include:

Barry, Barton, Bollinger, Boone, Butler, Camden, Cape Girardeau, Cedar, Christian, Cole, Crawford, Dade, Dallas, Dent, Dunklin, Franklin, Gasconade, Greene, Iron, Jasper, Jefferson, Lawrence, Madison, Maries, Miller, Mississippi, Morgan, New Madrid, Oregon, Osage, Ozark, Pemiscot, Perry, Phelps, Pike, Pulaski, Ralls, Scott, Shannon, St. Louis, Ste. Genevieve, Stone, Texas, Wayne, Webster, Wright

Low-to-Moderate Beneficiaries

The CDBG-MIT funds will be used solely for necessary expenses related to mitigation activities, as applicable, in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.). With respect to activities expected to be assisted with CDBG-MIT funds, this action plan has been developed to give priority to activities that will benefit low- and moderate-income families. The aggregate use of CDBG-MIT funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 50 percent of the CDBG-MIT grant amount is expended for activities that benefit such persons.

Subrecipients will not attempt to recover any capital costs of public improvements assisted with CDBG-MIT funds by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

Eligible Applicants

Units of General Local Government (UGLGs), cities and counties only, within the 55 counties presidentially declared under DR-4317. The only exception to the City and County applicants falls under the Category of Planning where Regional Planning Commissions may apply directly to the CDBG-MIT Program for planning funds.

- Eligible Sub-Applicants/Sub-Recipients: City and county governments may choose to partner with eligible quasi-governmental agencies or non- profits.
- Priority Sub-Applicants/Sub-Recipients: Priority consideration will be given to applications from cities and counties that partner with RPCs/COGs as sub-applicants.

Program Categories

Categories indicate the use of funds for a specific purpose. This Action Plan defines the categories of funds under Infrastructure, Planning, and Administration. The categories define the specific purpose, the total funds allocated to the category, the application method for accessing funds, deadline dates for applications within the Category, the maximum amounts available per applicant and the maximums per beneficiary.

Maximum Award

The State of Missouri has fully determined maximum awards under each Program Category based on a cost reasonableness approach and objective to maximize the CDBG-MIT funds to the greatest extent possible. Based on the funding caps in each category, the State of Missouri estimates at least 170 mitigation projects to be implemented in the HUD and State MIDs funded with CDBG-MIT funds. As the State and local communities make efforts to leverage other mitigation funding sources, these projects could increase to 200.

General Infrastructure Program

- Total Program Funds: \$13,309,440
- Total Funds for HUD MIDs: \$ 6,654,720
- Total Funds for State MIDs: \$6,654,720
- Maximum Award per Project: \$2,500,000
- Total Estimated Projects: 6 (3 per each MID region)

Public Facility Hardening Program

- Total Program Funds: \$13,308,440
- Total Funds for HUD MIDs: \$6,654,720
- Total Funds for State MIDs: \$6,654,720
- Maximum Award per Project: \$5,000,000
- Total Estimated Projects: 2 (at least 1 in each MID region)

Critical Facility Generators Program

- Total Program Funds: \$3,327,360
- Total Funds for HUD MIDs: \$1,663,680
- Total Fund for State MIDs: \$1,663,680
- Maximum Award per Project: \$50,000
- Total Estimated Projects: 66 (at least 33 projects in each MID region)

Warning Systems Program

- Total Program Funds: \$3,327,360
- Total Funds for HUD MIDs: \$1,663,680
- Total Fund for State MIDs: \$1,663,680
- Maximum Award per Project: \$50,000
- Total Estimated Projects: 66 (at least 33 projects in each MID region)

Mitigation Planning

- Total Program Funds for Mitigation Planning: \$3,119,400
- Total Funds for HUD MIDs: \$1,559,700
- Total Funds for State MIDs: \$1,559,700
- Maximum Award per Project: \$150

- Total Estimated Projects: 20 (10 projects in each MID region)

Capacity Grants

- Total Program Funds for Capacity Grants: \$ 1,934,028
- Total Funds for HUD MIDs: \$967,014
- Total Funds for State MIDs: \$967,014
- Maximum Award per Project: \$200,000
- Total Estimated Projects: 10 (5 staff in each MID region)

Table 24: Maximum Project Award Per Program

Program	Allocation	# Est. Projects	Maximum Award	Eligible Applicants	LMI Priority
Infrastructure	\$33,273,600	140			
• General Infrastructure	\$13,309,440 HUD MID	6	\$ 5,000,000	Units of Local Government	Must show how LMI prioritized
• Public Facility Hardening	\$13,309,440	2	\$ \$1,000,000	Units of Local Government	Must show how LMI prioritized
• Generators for Critical Facilities	\$ 3,327,360	66	\$ 50,000 per generator	Units of Local Government	Must show how LMI prioritized
• Warning Systems	\$ 3,327,360	66	\$ 50,000 per system	Units of Local Government	Must show how LMI prioritized
Planning and Capacity Grants	\$ 6,238,800	30			
• Mitigation Planning	\$ 3,119,400	20	\$ 150,000	Units of Local Government and COGs	Must show how LMI prioritized
• Capacity Grants	\$ 1,934,028	10	\$ 200,000	Units of Local Government and COGs	Must show how LMI prioritized

5.7 CDBG-MIT APPLICATION AND LMI PRIORITY FUNDING

The state CDBG-MIT Program will prioritize funding based upon an evaluation using 100-point scoring criteria. Within this matrix will be a criterion called “Priority LMI” that provides up to 10 points for projects with 51% or more LMI beneficiaries. Additional criteria could potentially include readiness to proceed, funds leveraged, activity supports other mitigation efforts, etc. Once the final criteria are determined for each program application it will be weighted and assigned point value.

The State CDBG-MIT Program will prioritize funding based upon an evaluation using 100-point scoring criteria. Applications for assistance will include the scoring criteria for each component of the evaluation and points associated with the meeting the criteria.

Each program Category for Infrastructure and Planning will have an accompanying application form and guidelines to assist eligible cities and counties with submission of their requests to the State CDBG-MIT Program at the Missouri Department of Economic Development (MO-DED).

The eligible geographic area is defined by the UGLG winning the award. If the subrecipient is a county, then the eligible geographic area is the area within that jurisdiction. If it is a regional COG, then it would be for the region represented by that COG.

5.8 OPERATIONS AND MAINTENANCE

The CDBG-MIT funds will be awarded for eligible projects to UGLGs through competitive application process. Where a project is wholly contained within a jurisdiction, that jurisdiction is responsible for identifying local resources to cover the operation and maintenance costs. The jurisdiction must provide an operations and maintenance plan with its application. If the jurisdiction will be reliant on any proposed changes to existing taxation policies or tax collection practices, these proposed changes will also be required with the application with the relevant milestones included. Where projects may be regional in nature and cross jurisdictions, the applicants will have to provide a Memorandum of Understanding describing how long-term operation and maintenance will be shared by the entities and include description of any proposed change to taxation or tax collection practices.

5.9 EXCEPTION POLICY

The State of Missouri will make exceptions to the maximum award amounts based on its Exception Policy. Each request for an exception to the maximum award amount or other program policies will be reviewed on a case-by-case basis by MO-DED. Requests must be submitted in writing and include a justification for exceeding the maximum award amount or other policy requirements. The policy exception is not to be implemented until the MO-DED authorizes the exception in writing. Requests will be review by MO-DED and a response will be provided in writing within 5 business days. All exceptions must still meet HUD's requirements for necessary and reasonable.

5.10 LEVERAGED FUNDS

Infrastructure

The State of Missouri understands the importance of leveraging funds to increase its ability to address major disasters and implement mitigation projects. As part of the initial response to the 2017 disasters, the State CDBG-DR Program established a system for notification by the FEMA and SEMA Public Assistance programs when communities were hesitating to engage in Public Assistance projects because of the cost of the local match,

and when communities were hesitating to engage in Public Assistance projects with additional mitigation activities because of the cost of the local match. Based upon this partnership, MO-DED worked to support local eligible communities with matching funds to allow the projects to take advantage of the federal Public Assistance dollars as well as take advantage of additional mitigation design elements.

The MO-DED enjoys strong ties to infrastructure funding partners in the state and has co-sponsored the Missouri Water and Wastewater Review Committee for more than 15 years. The Committee is made up of the Missouri Department of Natural Resources and the Rural Development State Offices of the USDA; the agencies that represent the largest public infrastructure financing in the state.

In addition, CDBG has also had longstanding partnerships with the:

- US Army Corps of Engineers,
- Economic Development Administration
- Missouri Department of Transportation
- Local statutory authorities of Community Improvement Districts, Transportation Development Districts, and Tax Increment Financing Districts.

The goal for the use of the CDBG-DR funding is to continue the track record of leveraged investments.

Housing

Although not an objective of these CDBG-MIT funds, the state has, and will continue to encourage the leveraging of funding for housing from the:

- MHDC HOME Investment Partnership, HERO program, state and federal low-income housing tax credits (both 4% and 9%) and Emergency Shelter Grant program,
- Department of Economic Development, Division of Business and Community Services, CDBG Program and Neighborhood Preservation Tax Credit Program
- Department of Economic Development, Division of Energy, Weatherization Program
- U.S. Department of Agriculture - Rural Development
- U.S. Department of Housing and Urban Development
- Department of Public Safety, State Emergency Management Agency, Hazard Mitigation Program
- Small Business Administration, Home Disaster Loan Program
- the non-governmental philanthropic organizations, non-profit development organizations
- private sector development community

- disaster survivor financial participation and sweat equity (to the extent feasible and practical).

The goal is to facilitate housing rehabilitation, reconstruction and new construction of affordable single- family homes and multifamily dwellings in a manner consistent with the need for resiliency and mitigation in the HUD and State MIDs. Care will be taken to consider mitigation design and demand suitable to the market.

Economic Revitalization

The state has and will continue to leverage funding assistance for economic revitalization from the SBA business loan and economic injury disaster loan program

- EDA disaster funding for commercial revitalization, planning and infrastructure development activities that support business development
- Missouri Development Finance Board Small Business Loan Program
- Missouri Department of Economic Development, Division of Tourism, matching tourism marketing grant program
- Local non-profit and quasi-governmental revolving business loan programs
- USDA Rural Development business lending and infrastructure development programs
- Missouri Department of Transportation Economic Development set-aside for transportation in direct support of business development.

The goal is to facilitate business retention and expansion in support of the restoration of the negative impacts to the regional economy.

5.11 COST REASONABLENESS AND COST ANALYSIS

Local government grantees receiving CDBG-MIT funds are required to follow State CDBG-MIT program policies and procedures in order to assess the cost-effectiveness of mitigation projects relative to other alternatives by deploying a cost reasonableness test. The test must describe the method for determining when the cost of the mitigation will not be cost-effective relative to other means of assistance.

The policies and procedures will address controls for assuring construction costs are consistent with market cost at the time and place of construction. Costs cannot exceed the maximum award amounts described in this Action Plan. If an activity is required to exceed the maximum award amount, the local government must submit a request for an exception per the MO-DED Exception Policy.

All other changes to the original scope of construction work must be addressed through a Change Order process. The Change Order process requires that the Change Order be submitted in writing to the local government with justification for making the change. The Change Order must be necessary and reasonable for reimbursement from CDBG-MIT

funds. The State will require local government grantees to require construction contractors to implement cost control measures or verify that reimbursable costs are correctly controlled during the project.

Standard Agreements with jurisdictions will include subrogation clauses in case of the event of noncompliance with the applicable requirements and regulations. A grantee may find it necessary to provide exceptions on a case-by-case basis to the maximum amount of assistance or cost effectiveness criteria; the State CDBG-MIT program will describe the process UGLGs will use to make such exceptions in its policies and procedures. All CDBG-MIT expenditures remain subject to cost principles in 2 CFR part 200, subpart E – Cost Principles, including the requirement that costs be necessary and reasonable for the performance of the grantee’s CDBG-MIT grant.

5.12 POLICIES AND PROCEDURES

A manual outlining the Policies and Procedures associated with the use of CDBG-MIT Funding will be available at: <https://ded.mo.gov/programs/cdbg/mitigation>.

In addition to the federal compliance areas of procurement, citizen participation, financial management, labor standards, equal opportunity and fair housing, environmental review and contract management, the manual will include housing quality standards, green building standards, and construction standards related to housing rehabilitation, housing reconstruction and new construction, duplication of benefits requirements and processes, deed restrictions and applicable Uniform Relocation Act requirements, Optional Relocation Plans, resolutions related to flood insurance requirements, Program agreements and contract documents, beneficiary intake forms, etc. In regard to applicable Uniform Relocation Act requirements, the State will define “demonstrable hardship” in the policies and procedures.

Duplication of Benefits Review

A duplication of benefits occurs when an impacted community receives financial assistance from multiple sources such as FEMA, USACE, EDA, insurance, etc. for a cumulative amount that exceeds the total need for a particular mitigation purpose. A duplication of benefits (DOB) review will be applied to all CDBG-MIT activities. In determining an applicant’s unmet need, grantees must follow the State’s Duplication of Benefits policy or develop policies and procedures to prevent any duplication of benefits in accordance with the State’s policy. The State will review the Grantee’s duplication of benefits policy and procedures to ensure that it meets the DOB requirements of the Stafford Act and HUD’s guidance under Federal Register Notices 84 FR 28836, 84 FR 28848, published June 20, 2019 and 76 FR 71060 published November 16, 2011. At a minimum, the process for determining any duplications will include assessing the need, identifying the total assistance available to the applicant, deducting benefits received for a different purpose, deducting funds received for the same purpose but a different eligible use, and funds not available. Once the duplicated funds have been identified and

subtracted from the unmet need amount, any remaining unmet need can be assisted with the CDBG-MIT funds.

The State requires a subrogation agreement to be signed by every applicant for CDBG-MIT assistance. A subrogation agreement ensures that any benefits received by the sub-recipient after the processing of the grant award that may represent a duplication will be paid back.

Training and Technical Assistance

The complexity associated with using CDBG-MIT funds requires training and technical assistance to ensure that project goals are achieved while remaining compliant with program rules and regulations for mitigation activities. The CDBG-MIT Program will offer training opportunities to interested parties at the application stage and the new grantee training stage. Training to build subrecipient capacity will be implemented throughout the year by focusing on specific program compliance areas. Technical assistance is available to every potential applicant, sub-applicant, and professional service provider throughout each stage of the process. The Missouri CDBG-MIT Program employs regional field representatives assigned to specific areas of the state, as well as specialists, who maintain expertise in certain fields such as housing, economic development, and infrastructure and compliance areas such as procurement, equal opportunity and fair housing, Uniform Relocation Act, labor standards, financial management, and environmental review. MO-DED may include Special Conditions in the subrecipient agreement to address identified capacity issues.

5.13 CDBG-MIT DISASTER WEBSITE

A dedicated CDBG-MIT web page found at:

<https://ded.mo.gov/programs/cdbg/mitigation> will be used to post a copy of the draft Action Plan for public comment and the final HUD-approved Action Plan and any Amendments. The CDBG-MIT website will comply with the following requirements from the FRN. The Website Policy is included with the Citizen Participation Plan found in Appendix 3, Attachment A.

The information on the CDBG-MIT subsite will include but may not be limited to:

- Action plans and amendments
- Information on each program, requirements, and steps to apply
- Program policies and procedures
- Procurement
- Procurement Policies
- Current RFPs
- Eligibility for competitive sub-awards (if applicable)
- Awarded contracts

- CDBG-MIT Citizen Participation Plan
- Quarterly Performance Reports
- Statistics/graphics displaying expenditures and outcomes to date and projections
- Accessibility and LEP requirements

6. CDBG-MIT Activities Analysis Impacts on Protective classes

Fair Housing

The State of Missouri is committed to providing housing assistance programs in a manner that furthers fair housing opportunities to all residents. The State will enact planning and outreach efforts to ensure rebuilding is equitable across communities and that public infrastructure projects seek to assist LMI persons on an area-wide benefit. The State will implement all regulations in accordance with the Fair Housing Act. All sub-grantees will be required to certify that they will administer their programs in accordance with the Fair Housing Act and that the program will affirmatively further fair housing. Each sub-grantee will promote more resilient and affordable fair housing choices.

Accessibility Accommodations

The use of CDBG-MIT funds must meet accessibility standards, provide reasonable accommodations to persons with disabilities and take into consideration the functional needs of persons with disabilities in the relocation process. Guidance on relocation considerations for persons with disabilities may be found in Chapter 3 of HUD's Relocation Handbook 1378.0 (available on the HUD Exchange website at https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/13780). A checklist of accessibility requirements under the Uniform Federal Accessibility Standards (UFAS) is available at <https://www.hudexchange.info/resources/documents/Ufas-Accessibility-Checklist.pdf>. The HUD Deeming Notice 79 FR 29671 (May 23, 2014) explains when HUD recipients can use 2010 ADA Standards with exceptions, as an alternative to UFAS to comply with Section 504.

Impact to Vulnerable Populations

Returning to pre-flood circumstances is not an acceptable alternative for many vulnerable community members. As a community rebuilds its housing, infrastructure and economic base, there is also a necessary effort to improve the opportunities for many citizens. The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act), as amended, contains Section 308, Nondiscrimination in Disaster Assistance which is designed to protect individuals from discrimination based on their race, color, nationality, sex, age or economic status.

All recipients of CDBG-MIT funding must comply with Title VI of the Civil Rights Act of 1964. HUD FRN (84 FR 45838), requires Grantees to assess how planning decisions may

affect members of protected classes, racially and ethnically concentrated areas, as well as concentrated areas of poverty; will promote the availability of affordable housing in low-poverty, nonminority areas where appropriate; and will respond to natural hazard-related impacts. In line with Missouri’s method of distribution, the grantee (UGLG) must adhere to this requirement when applying for planning and other CDBG-MIT activities.

The U. S. Department of Justice offers guidance to communities undertaking disaster recovery:

1. Reaffirm commitment to non-discrimination protections
2. Engage and include diverse racial, ethnic and Limited English Proficient (LEP) populations
3. Provide meaningful access to LEP individuals
4. Include immigrant communities in recovery efforts
5. Collect and analyze data

In addition to the LEP plan and other activities/supportive services to ensure the inclusion of all affected persons, the State CDBG-MIT Program must also evaluate the physical infrastructure that supports vulnerable populations such as housing for disabled persons, homeless shelters and transitional housing.

The state relied on three data sources to evaluate the need related to housing for vulnerable persons:

1. The FEMA 1-800 number registration information
2. A county by county survey of unmet need conducted by the Community Action Agencies
3. Interviews and data collection from the Missouri Housing Development Commission (MHDC).

Note: In the immediate aftermath of the flood, the MHDC, their partners at the Community Action Agencies, and members of the Governor’s Partnership reached out to vulnerable populations in damaged dwellings in order to connect them to state and local resources.

FEMA data provided the following self-reported circumstances that may be classified as vulnerable in the HUD and State MIDs:

Table : Owner-occupied/Renter Vulnerability for HUD and State MIDs

Vulnerability	Owner-Occupied	Renter/Tenant
Occupied by 62 or older and living alone	326	24
Occupied by person with disabilities	48	14
Occupied by persons with no reported income	117	98
Occupied by person with less than 30% MHI	404	293
Total	895	429

6.1 PROMOTE HOUSING FOR VULNERABLE POPULATIONS

The State of Missouri conducted an unmet needs survey following the 2017 disasters to identify impacts to vulnerable populations. While the unmet need survey performed did not result in consistent responses from every county the total homeless count was on par with the point-in-time survey performed by MHDC. More importantly, the survey did indicate damage to dormitories (68 units), a group home (1), and several transitional housing units (36) which, when combined with the point-in-time survey and the “Statewide Homeless Study” will help to inform a category set-aside of funds to address homelessness in the disaster regions for assistance with CDBG-DR funds. The total dollar value of unmet need expressed on the surveys was \$3.2M.

Citations of need also are sourced from the University of Missouri St. Louis Public Policy Research Center, the MHDC sponsored “Statewide Homeless Study”, and the Point in Time Count. There are eight Continuum of Care (CoC) operating in the state; seven that serve metropolitan areas and the eighth which serves 101 non-entitlement Missouri Counties. The disaster counties are served by the Joplin CoC, the Springfield CoC, the St. Louis CoC and the “Balance of State” CoC. Generally, the disaster area regions in the Balance of the State CoC include portions of Region 1, 2, 5, 6, 7, 8, 9 and 10.

Table 26: Balance of State Homeless Count

Balance of CoC Region	Number of Sheltered and Unsheltered Homeless Persons by Region	Number of Sheltered and Unsheltered Homeless Households by Region
1	61	45
2	12	12
5	439	325
6	78	53
7	88	77
8	71	48
9	60	44
10	154	101
Total	963	705

The split between sheltered versus unsheltered is 77% versus 23%, respectively. Homeless sub-populations include 16% with mental illness, 21% with a substance disorder, less than 1% with HIV/AIDS and 24% victims of domestic violence. 100 of the total persons and 98 of the total households are veterans. 104 of the total persons are unaccompanied youth; 28 of whom are less than 18 years of age. Of the counties declared in the disaster, Boone, Butler, Cole, Howell, Phelps and Dunklin are in the top ten counties with the highest homeless population.

CDBG-MIT funds will be used to increase resiliency and safety for vulnerable populations in the HUD and State MIDs by installing Warning Systems and Critical Infrastructure

Generators which will provide life-saving warnings ahead of severe storms and Tornadoes. Additionally, hardening the transportation infrastructure will help to keep roadways and bridges open so that emergency responders can reach these vulnerable populations during a disaster event.

6.2 MINIMIZE DISPLACEMENT

The use of CDBG-MIT funded activities will be designed to minimize displacement. In accordance with the Housing and Community Development Act of 1974, as amended, (HCDA), and US Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and 570.440 (1), use of Community Development Block Grant Mitigation (CDBG-MIT) funds must minimize adverse impacts on persons of low and moderate-income persons. Any person or business displaced due to a CDBG-MIT activity will be eligible for full Uniform Relocation Assistance (URA) as allowed per implementing regulations at 49 CFR Part 24.

Proposed CDBG-MIT projects are not anticipated to displace or adversely affect low- and moderate-income persons. However, Voluntary Buyout activities are an eligible use of CDBG-MIT funds and could be allocated in the future if need is determined. In the event that a Voluntary Buyout program is created under the CDBG-MIT program, the State may provide Optional Relocation assistance to the low-to-moderate income households to ensure they can find permanent safer and more resilient housing in a safer area. If through a Voluntary Buyout a tenant is displaced, the tenant household will be eligible for full URA benefits.

Uniform Relocation Assistance

A displaced person is eligible to receive advisory services, reasonable moving expenses and security deposits and credit checks, interim living costs for actual reasonable out-of-pocket costs incurred in connection with the displacement including moving expenses, and replacement housing assistance as described above and in the Missouri CDBG-DR Program Housing Guidelines.

Minimizing Displacement

The following steps will be taken, where applicable, to minimize direct and indirect displacement of persons from their homes. Applicability of items on this checklist is dependent upon the project objectives and related feasibility of each action.

1. Coordinate code enforcement with rehabilitation and housing assistance programs.
2. Evaluate housing codes and rehabilitation standards in subrecipients' project areas to prevent undue financial burden on established owners and tenants.
3. Adopt policies which provide reasonable protections for tenants residing in affected properties.

4. Schedule rehabilitation of apartment units to allow tenants to remain in the building/complex as long as possible during and after rehabilitation, working with empty units first.
5. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
6. Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.
7. Establish or utilize approved local counseling centers to provide homeowners and tenants with assistance to understand their options and implement their choices in the face of displacement.
8. If feasible, demolish or convert only dwelling units that are not occupied or vacant occupiable “dwelling units” (as defined in 24 CFR 42.305).
9. Target only those properties deemed essential to the need or success of the project to avoid displacement that is unnecessary.

7. Application Status, Timely Expenditures, and Projections for Expenditures and Performance Outcomes

7.1 APPLICATION STATUS

The MO-DED will accept and process applications from eligible applicants for eligible CDBG-MIT funded projects. Eligible applicants include local cities, counties, and COGs. Applicants will be able to obtain applications from the CDBG-MIT website. Status on all applications for CDBG-MIT funds will be accessible through the website. Applicant Statuses will include the following:

- Application Received
- Application Under Review
- Application on Hold Pending Further Information
- Application Funded
- Application Not Funded

7.2 TIMELY EXPENDITURES

The MO-DED will ensure timely expenditure of funds through the following means:

- All grant awards will be tracked through the MO-DED grants management system for monthly expenditures.
- Subrecipients will be required to report quarterly on program performance of CDBG-MIT activities.
- If subrecipient appears to be falling behind expenditure schedule, MO-DED will meet with the subrecipient to determine why the project is not moving forward and a corrective action will be determined.

- If a subrecipient cannot meet the first 6-year expenditure requirement of 50% of the funds, MO-DED reserves the right to recapture the grant and fund an alternative mitigation project.

Subrecipients will be required to show that invoices and bills submitted were paid in a timely manner and only eligible costs that are included in the scope of works were reimbursed before MO-DED will expend CDBG-MIT funds to reimburse its subrecipients.

7.3 PROJECTIONS FOR EXPENDITURES AND PERFORMANCE OUTCOMES

The State of Missouri projects the following expenditures and performance outcomes. As funds become available and applications for mitigation projects have been approved, the MO-DED will adjust projections to align with awarded projects.

Table 27: Projections for Expenditures and Performance Outcomes

Program	Allocation	% Total Funds	Expended by 2026	Expended by 2032	Max Award	Performance Outcomes
Infrastructure	\$33,273,600	80%	\$16,636,800	\$33,273,600		140 projects
• General	\$13,309,440	32%	\$ 6,654,720	\$13,309,440	\$2.5M	6 projects
• Infrastructure						
• Public Facility Hardening	\$13,309,440	32%	\$ 6,654,720	\$13,309,440	\$5M	2 projects
• Generators for Critical Facilities	\$ 3,327,360	8%	\$ 1,663,680	\$ 3,327,360	\$50K	66 projects
• Warning Systems	\$ 3,327,360	8%	\$ 1,663,680	\$ 3,327,360	\$50K	66 projects
Planning and Capacity Grants	\$ 6,238,800	15%	\$ 3,119,400	\$ 6,238,800		30 projects
• Mitigation Planning	\$ 3,119,400	7.5%	\$ 1,559,700	\$ 3,119,400	\$150K	20 projects
• Capacity Grants	\$ 1,934,028	4.6%	\$ 967,014	\$ 1,934,028	\$200K	10 projects
• NFIP Coordinator	\$ 249,552	.6%	\$125,000	\$ 249,552	\$125K per yr.	1 staff for two years
• DED Planning	\$935,820	2.3%	\$467,910	\$935,820	NA	Action Plan, Amendments, etc.
DED Administration	\$2,079,600	5%	\$1,039,800	\$2,079,600		
	41,592,000	100%	\$20,519,900	41,592,000	NA	

Quarterly Performance Reports (QPRs)

The MO-DED will be responsible for reporting CDBG-MIT performance in the HUD DRGR data management system. MO-DED will ensure that actual and projected expenditures of funds are accurately reported in the Quarterly Performance Reports (QPR). QPRs will be posted on the CDBG-MIT website within 3 days of being submitted to HUD each quarter. Reports will include data from the monthly and quarterly performance reports submitted by the Subrecipients to MO-DED.

8. Administration, Substantial, and Non-Substantial Amendments

8.1 ADMINISTRATIVE FUNDS

State administrative costs, including grantee administration costs, will not exceed five percent or \$2,079,600 of the \$41,592,000 allocation. Planning and administrative costs combined will not exceed 20 percent.

The provisions outlined under 42 U.S.C. 5306(d) and 24 CFR §570.489(a)(1)(i) and (iii) will not apply to the extent that they cap state administration expenditures and require a dollar-for-dollar match of state funds for administrative costs exceeding \$100,000.

Pursuant to 24 CFR §58.34(a)(3), except for applicable requirements of 24 CFR §58.6, administrative and management activities are exempt activities under this Action Plan.

8.2 PROGRAM INCOME

The use of CDBG-MIT funds may potentially generate program income. Should any funds be generated, recovery of funds including program income, refunds and rebates will be used before drawing down additional CDBG-MIT funds. The DRGR system requires grantees to use program income before drawing additional grant funds and ensures that program income retained by one will not affect grant draw requests for other grantees. Grantees will be required to report program income quarterly and will be subject to applicable rules, regulations and HUD guidance. Retention of program income will be in compliance with the grantee agreements. Policies and procedures for program income are included in the CDBG-DR and CDBG-MIT Implementation Manual.

8.3 PRE-AGREEMENT COSTS

The State of Missouri will reimburse eligible pre-award costs for CDBG-MIT activities. The provisions of 24 CFR 570.489(b) are applied to permit a State grantee to charge to the grant eligible pre-award costs incurred by itself, its recipients or subrecipients (including public housing authorities (PHAs)) that are associated with CDBG-MIT funds and comply with grant requirements. Section 24 CFR 570.200(h)(1)(i) will not apply to the extent that it requires pre-award activities to be included in a consolidated plan. Each grantee must include all pre-award activities in its action plan.

Under the Prior Notices, grantees were permitted to charge to grants the pre-award and pre-application costs of homeowners, businesses, and other qualifying entities for certain eligible recovery costs they incurred within one year of a qualified disaster. Because the one-year period has passed for all grantees receiving an allocation pursuant to this notice and because CDBG-MIT funds are provided in order to reduce risks from future disasters, CDBG-MIT funds shall not be used to reimburse homeowners, businesses or entities

(other than grantees, local governments, and subrecipients described above) for mitigation activities completed prior to the applicability date of this notice.

The regulation cited at 2 CFR 200.458 defines pre-agreement costs as “those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency”.

Since the disaster occurred in the spring of 2017 and access to the disaster funding is expected in mid-2020, the Missouri CDBG-MIT Program anticipates the request of pre-agreement costs, consistent with the regulation, the accompanying CPD Notices and the related Federal Register for only a few specific project costs incurred.

Once a grant agreement is fully executed, the Missouri CDBG-MIT Program will allow the drawdown of pre-agreement costs associated with eligible mitigation activities dating back to the date of the 2017 disaster for subrecipients with appropriate documentation. The Missouri CDBG-MIT Program will submit only those costs that follow the CDBG cross-cutting regulations and only those that meet the definition of mitigation as per the FRN. No requests shall be of the size or amount that will cause a substantial amendment to the Action Plan and all costs will be clearly identified in a category recognized in the Action Plan.

8.4 SUBSTANTIAL AND NON-SUBSTANTIAL ACTION PLAN AMENDMENTS

Substantial Amendments to the Action Plan will require public notice and 30 days public comment. The public notice will be posted on the CDBG-MIT website and follow procedures detailed in the Citizen Participation Plan (Attachment X). The thresholds for a substantial amendment are as follows:

1. Action Plan – an amendment shall be considered substantial (requiring public notification and 30 day comment period) in the following events:
 - a. a new funding source be added to the Plan
 - b. the addition or deletion of an activity
 - c. a change in program benefit or eligibility criteria
 - d. the allocation for a new funding category or reallocation of a monetary threshold more than 25% of the allocation transferred between funding categories not to exceed HUD established maximums
 - e. a Covered Project is proposed

Requirements for Local Governments Receiving CDBG-DR Funds

Recipients of CDBG-DR funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570 as amended by the FRN (84 FR 45838). All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG-MIT project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them.

Citizens shall be provided adequate and timely information, to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least the determination of needs, the review of the proposed activities, and the review of past program performance, in the following manner:

- 1) At least one public hearing shall be held prior to the submission of an application for housing and/or non-housing needs being submitted to the State for funding through the CDBG-MIT program. Hearings shall be scheduled at a time and location felt to be most likely possible of the majority of interested citizens to attend without undue inconvenience. The development of needs and the review of the proposed activities and their possible environmental impact must be addressed at this hearing as reflected by minutes of the hearing. The hearing cannot be more than six months prior to application submittal. The second required hearing is held to address the performance on the funded grant at a minimum of 80% completion. The review of performance (during the grant) must be addressed in public hearing prior to grant close-out. Proof of said hearing will be part of close-out documentation.
- 2) Notification of all hearings shall be given a minimum of five full days (actually seven days, as the day of the notice and the day of the hearing cannot be counted as one of the five full days) in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution, and/or by posting letters, flyers, and any other forms that are clearly documented with wide circulation. All hearings must be accessible to handicapped persons. Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance.

The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the decision-making time. Any criticism submitted in writing at any time should be answered in writing within fifteen working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Availability to the Public

The state will provide the Action Plan, as adopted, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at: <https://ded.mo.gov/programs/cdbg/mitigation>.

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the state's CDBG-MIT Action Plan and the State's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the state has designated an appropriate and practicable procedure to handle complaints from citizens related to the consolidated plan, amendments, and performance reports. Upon receiving a complaint, the state will provide a timely, substantive written response to written citizen complaints within a fifteen working day time period. Further information regarding Complaints are in the attached Citizen Participation Plan, Appendix 3.

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1- 800-347-3735 or email: hotline@hudoig.gov).

9. Citizen Advisory Group for CDBG-MIT Activities

The FRN for the CDBG-MIT funds requires that following the CDBG-MIT Action Plan approval, the State of Missouri is to form one or more citizen advisory committees that shall meet in an open forum not less than twice annually in order to provide increased transparency in the implementation of CDBG-MIT funds, to solicit and respond to public comment and input regarding the grantee's mitigation activities and to serve as an on-going public forum to continuously inform the grantee's CDBG-MIT projects and programs.

The MO-DED will work with the HUD and State MID communities and their respective COGs to form the required Citizen Advisory Group(s). The MO-DED will use the CDBG-MIT website and outreach strategies to notify residents of the opportunity to participate.

Once the Group(s) are established, MO-DED will post meeting times and places, agendas, and meeting minutes to the CDBG-MIT website.

10. Citizen Participation

State of Missouri has a comprehensive Citizen Participation Plan for stakeholders and residents to be fully informed regarding participation in the State of Missouri's CDBG-MIT Action Plan development. All Public Notices, informational material, signage, and comment cards were made available in both English and Spanish. Facilities utilized for public engagement were accessible to persons in wheelchairs/walkers. Anyone needing alternative accommodations are provided a phone number and email address to request their accommodations. The full Citizen Participation Plan is in Appendix 2 of the Action Plan.

In compliance with the FRN, the State of Missouri is holding pre-Action Plan informational and comment hearings in 5 locations throughout the HUD MID counties. The Public Notice below was posted on the CDBG-MIT website on January 14, 2020 and sent to MO-DED listservs for notification of the upcoming hearings.

Missouri Department of Economic Development
Community Development Block Grant – Mitigation
(CDBG-MIT)
Notice of Public Hearings

The Department of Economic Development (DED) will hold two public hearings to offer citizens the opportunity to provide public comment and input into the plan for spending \$41 Million of CDBG-MI funding allocated by Federal Register notice 84 FR 45838 from the U.S. Department of Housing and Urban Development (HUD) on Aug. 30, 2019.

CDBG-MIT funds represent an opportunity for the State of Missouri to use this assistance in areas impacted by 2017 floods to carry out strategic and high-impact projects that will mitigate disaster risks and reduce future losses. While it is impossible to eliminate all risks, CDBG-MIT funds will help communities mitigate against future disaster risks and coordinate State and local planning activities. This funding is separate from the HUD CDBG-DR funding that has been provided to the State for assistance to individual households.

The hearings will:

- Explain what mitigation is and how CDBG-MIT funding may be used
- Allow members of the public to provide comments and ask questions
- Offer an interactive workshop focused on different mitigation topics.

Depending on the location, the public will have access to the hearing facilities during a morning session (10:00am) or evening session (6:00pm). The first hour will be dedicated

to an interactive workshop, proceeding with the presentation and public comments period. Written public comments may also be submitted by email to mocdbg-mit@ded.mo.gov or by mail to P.O. Box 118 Harry S. Truman Building Jefferson City, MO 65102. Those needing special accommodations to attend the hearings, should call (844)847-0499 or email mocdbg-mit@ded.mo.gov. For additional information visit the DED website at <https://ded.mo.gov/mitigation>.

Van Buren City Hall

Tuesday, 01/28/2020

Registration & Interactive Workshop: 10:00am

Presentation & Comments: 11:00am

1401 Main St

Van Buren, MO 63965

Doniphan Community Center

Tuesday, 01/28/2020

Registration & Interactive Workshop: 6:00pm

Presentation & Comments: 7:00pm

105 Washington

Doniphan, MO 63935

West Plains Civic Center

Wednesday, 01/29/2020

Registration & Interactive Workshop: 6:00pm

Presentation & Comments: 7:00pm

110 St. Louis Street

West Plains, MO 65775

Branson City Hall Council Chambers

Thursday, 01/30/2020

Registration & Interactive Workshop: 6:00pm

Presentation & Comments: 7:00pm

110 W Maddux St. #210

Branson, MO 65616

Neosho Civic Center

Friday, 01/31/2020

Registration & Interactive Workshop: 10:00am

Presentation & Comments: 11:00am

109 W. Main St. Neosho, MO 64850

10. Pre-Action Plan Workshop Outcomes

The MO-DED held an informational and interactive workshop prior to each public meeting. Attendees were asked to “vote” by placing stickers in the topic areas that they would like to see assisted with CDBG-MIT funds. The summary table below captures the outcome from the public’s engagement.

	BRANSON	DONIPHAN	NEOSHO	VAN BUREN	WEST PLAINS	TOTAL
AFFORDABLE HOUSING VOTING POSTER: My community needs more (vote for your top two choices)...						
Affordable, quality homes for sale	9	1	8	1	11	30
Affordable, quality rental units	3	3	6		7	19
Housing choices outside of flood zones		1	2	2	3	8
Parks and recreational space	2	1	4	1	8	16
Community amenities (such as good schools, stores, etc.)		10	1	2		13
BUYOUT VOTING POSTER: If the Buyout Program becomes available for your neighborhood, do you think you might participate in the program?						
Yes	22	12	5		46	85
No	1		2			3
I need more information			1		1	2
It would depend on many factors			3	1	4	8
It would depend on what my neighbors do	1					1

	BRANSON	DONIPHAN	NEOSHO	VAN BUREN	WEST PLAINS	TOTAL
It would depend on whether I can find a new home in the same area	1				3	4
INFRASTRUCTURE VOTING POSTER: Which infrastructure improvements are most important to protect Missouri from future disasters?						
Water and wastewater treatment facilities	33		5	3	13	54
Electric Grid	2		2	1	5	10
Natural Infrastructure	2		12	4	19	37
Transportation	6	12	2	3	33	56
PLANNING & RESILIENCE VOTING POSTER: What are the most important planning activities that Missouri and impacted communities should undertake to mitigate the impact of future disasters?						
Planning studies to identify mitigation opportunities	28	5	5	1	9	48
Changes to local and state zoning and building codes	8		1	4	6	19
Resilient construction practices	2	5	4	3	15	29
Training and building capacity of local	2	2	5	1	8	18

	BRANSON	DONIPHAN	NEOSHO	VAN BUREN	WEST PLAINS	TOTAL
		>50 Votes		50>30 Votes		

10.1 Pre-Action Plan Comments

The State of Missouri was very pleased with attendance of over 150 residents during the Mitigation Workshops and CDBG-MIT presentation. Several attendees provided comments and suggestions noted below. The suggestions were taken into consideration by the State and CDBG-MIT activities have been determined that will provide resilience planning including updates to local hazard mitigation plans. The majority of funds are allocated for infrastructure projects that mitigate future flooding such as raising low-water bridges and hardening critical public facilities to further protect homes and businesses. The State encourages green building and nature-based solutions as key components of proposed projects. The State will take under consideration commercial buyouts when necessary to purchase properties to implement flood mitigation.

BRANSON – Total attendance: 51

- Please consider opportunities to fund resilience planning projects like comprehensive stormwater plans, floodplain management plans, low water crossing inventories plus replacement plans, match for U.S. Army Corps Community Plans, etc. Including housing assessments to identify housing needs and develop a housing plan.
- Please consider funding projects outside of the MIDs, such as Marshfield Planning projects, transportation, infrastructure in Webster County, floodproofing/mitigation efforts in Cassville and Hurley, MO.
- Please consider funding projects to floodproof critical infrastructure such as wastewater treatment plants, improve low-water crossings.
- Please consider covering the local match requirement for FEMA funding to update multijurisdictional Hazard Mitigation Plans.

WEST PLAINS – Total attendance: 51

- Since 1991 Howell Creek flows out of its banks about every 4-5 years. What is the plan to ensure the water will stay within its banks? During the 2017 flood there was significant number of businesses affected by flooding. I would like to know what percent of commercial property was impacted compared to homes impacted within the City limits of West Plains, MO. I would also like to know if any economic studies were done to see how the flood impact the City and State due to the businesses closing permanently or temporarily. West Plains has lost a lot of businesses in the past few years. For West Plains to continue to thrive, the businesses still in West Plains need to be assisted to not just homeowners. I feel the [public hearing information] boards at the presentation do not address the issues I'm concerned about.
- Interested in Commercial Buyouts.

- 1033 6th street Buyout? [Appears to be a home address.] 2017 floods, affordable housing?

DONIPHAN/VAN BUREN (Applies to NEOSHO/WEST PLAINS) – Total attendance 12

- I attended the CDBG-Mitigation hearings in Van Buren and Doniphan, MO as a representative of The Nature Conservancy's (TNC) interests in working with communities to address flood hazards and mitigation opportunities. Specifically, we would like to see communities applying for CDBG-Mitigation funds utilize nature-based solutions to help make their infrastructure and citizens more resilient to flood events. TNC considers the following examples of nature-based solutions (please see the included sheets for more information on these practices):
 - Nature-based streambank stabilization
 - Protecting and restoring habitat along rivers and streams (such as green water retention ponds)
 - Restoring floodplains, wetlands, and riparian zones with natural vegetation and trees
 - Property buyouts
 - Open space preservation through land acquisition
 - Creation of regulations and policies (such as city ordinances) that protect streambanks and riparian areas from development
 - Flood-friendly stream crossings.
 While use of any one of these listed practices would help with flood resilience, it is TNC's position that the best plans will incorporate several of these. Most notably, we would like to point out the potential of including protecting and restoring habitat, restoring floodplains and riparian areas, and flood-friendly stream crossings in plans. Restoring and maintaining habitat, floodplains, and riparian areas improves terrestrial landscapes abilities to absorb rainwater, slows runoff, and slows the speed of floodwaters. Also, flood-friendly stream crossings are less likely to be damaged in a flood and allow water to flow more naturally through the stream channel and reducing it's need to hunt for new paths. Flood-friendly crossings also restore aquatic organisms' access to upstream portions of river systems, an additional benefit for areas supporting popular fisheries.

DONIPHAN – Total attendance 9

- Current River was always _____. At this point they do not allow gravel and be taken out of river. There ____ the river has filled in and spread out causing flooding in our town and county, causing a lot of damage.
- The City of Doniphan would like to see funding made available to acquire and demolish blighted properties within the City of Doniphan. After acquiring and demolition, building affordable housing on those properties would help replace the housing lost in previous floods.

VAN BUREN – Total attendance 3

- Please consider commercial buyouts as one of the eligible projects under the economic development category.
- Would like to be able to dig out ditches and low water crossings, build up the based to help prevent overflow. Also, raise low water bridges.
- Would like to be able to make the buyout properties useful in some ways not just empty lots of parking lots.

NEOSHO – Total attendance 36

- Would like to see more natural infrastructure and hardened infrastructure dollars on the front end of funding. Also, more funds allocated for collaborative planning (inter-agency and community-level) on front end.

Appendices

APPENDIX 1 - 2019/2020 MISSOURI COUNCIL OF GOVERNMENTS (COG) SURVEY ANALYSIS

2019/2020 Missouri Council of Governments (COG) Survey Analysis

In December 2019, the MO-DED sent out a survey to each of the COGs to obtain additional detail regarding the impacts to the communities in their areas, identified risks, costs of the 2017 disaster, and types of mitigation activities they would like to see implemented with the CDBG-MIT funds in their areas. The survey was implemented via a Google Form and sent via email to potential participants.

The survey received 16 responses from 11 unique COGs, eight of which contain State or HUD MID counties, and three that do not:

COGs with State/HUD MID Counties	Number of Responses
Bootheel Regional Planning and Economic Development Commission	1
Kaysinger Basin Regional Planning Commission	1
Lake of the Ozarks Council of Local Governments	1
Mark Twain Regional Council of Governments	1
Meramec Regional Planning Commission	1
South Central Ozark Council of Governments	1
Southwest Missouri Council of Governments	1
Ozark Foothills Regional Planning Commission	2
COGs without State/HUD MID Counties	
Pioneer Trails Regional Planning Commission*	4
Northeast Missouri Regional Planning Commission*	2
Green Hills Regional Planning Commission*	1

*While the original intention of the survey was to capture responses from the COGs that include the State and HUD MIDs, we also received responses from three other COGs. We have separated their responses when applicable in this analysis.

The results of the quantitative survey questions were analyzed using simple descriptive statistics and are presented by survey question below. Qualitative responses are featured in the Risk Based Needs Assessment within the relevant risk sections as well as section XX on Community Lifelines. In instances where there were multiple responses per COG, multiple responses were aggregated into one response.

What are the top risks encountered in your regions' counties?

The chart below displays the top risks selected by the COGs. For the COGs that include State/HUD MIDs, the most frequently selected risks were flooding, with all 8 of these respondents selecting Flash Flooding. More than half of the respondents also selected riverine flooding, severe thunderstorm, urban flooding and tornadoes. COGs without MID counties responded similarly, although more were concerned about drought, extreme temperatures and levee failure.

Exhibit 1. Top Rated Risks for COGs with State/HUD MID Counties

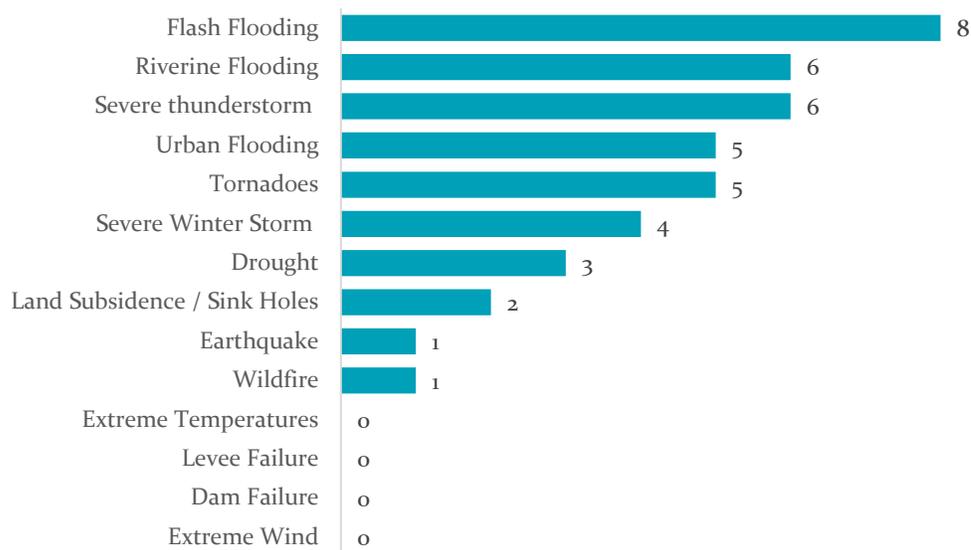


Exhibit 2. Top Rated Risks for all COG respondents

Risk	COGs with State/ HUD MID Counties	COGs without MID Counties	Total
Flash Flooding	8	3	11
Riverine Flooding	6	2	8
Severe thunderstorm	6	3	9
Urban Flooding	5	2	7
Tornadoes	5	3	8
Severe Winter Storm	4	3	7
Drought	3	3	6
Land Subsidence / Sink Holes	2	0	2
Earthquake	1	0	1
Wildfire	1	1	2
Extreme Temperatures	0	2	2
Levee Failure	0	2	2
Dam Failure	0	1	1
Extreme Wind	0	1	1

In the Floods of 2017 – select all of the 7 Critical Community Lifelines areas that were impacted in your planning commissions counties

Regarding the impacts to community lifelines during the 2017 flood events for the COGs with State/HUD MID counties, transportation was the most selected, followed by food, water and shelter. About half of respondents selected Energy, Communications and Safety and Security lifelines. COGs without MID counties had similar responses, although none selected Hazardous Material.

Exhibit 3. Effects of the 2017 Floods on Community Lifelines for COGs with State/HUD MID Counties

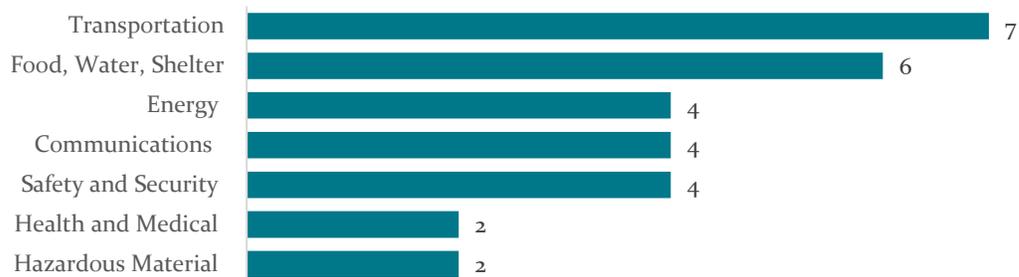


Exhibit 4. Effects of the 2017 Floods on Community Lifelines for all COG Respondents

Community lifelines	COGs with State/ HUD MID Counties	COGs without MID Counties	Total
Transportation	7	3	10
Food, Water, Shelter	6	2	8
Energy	4	1	5
Communications	4	1	5
Safety and Security	4	1	5
Health and Medical	2	1	3
Hazardous Material	2	0	2

Please indicate type(s) of mitigation activities that would best address your identified mitigation needs

The chart below shows the types of mitigation activities that each COG with State/HUD MID counties identified as best addressing their mitigation needs. Flood mitigation and tornado safe rooms were most frequently selected, with approximately half selecting the other three options. There were no differences between COGs with MID counties and those without.

Exhibit 5. Mitigation Activities Selected by COGs with State/HUD MID Counties

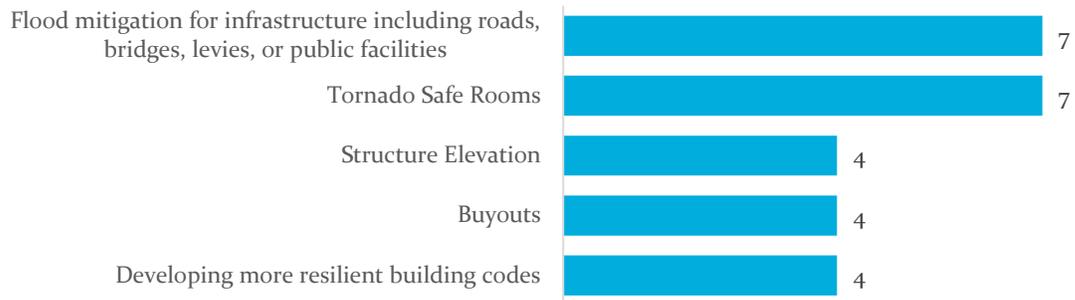


Exhibit 6. Mitigation Activities Selected by All COG Respondents

Activity	COGs with State/HUD MID Counties	COGs without MID Counties	Total
Flood mitigation for infrastructure including roads, bridges, levies, or public facilities	7	3	10
Tornado Safe Rooms	7	3	10
Structure Elevation	4	1	5
Buyouts	4	1	5
Developing more resilient building codes	4	1	5

2019/2020 Missouri Business Survey Analysis

Sample and Methods

In December 2019, the MO-DED sent out a survey to local businesses to obtain additional detail regarding the impacts to their businesses, costs of the 2017 disaster, and types of mitigation activities they would like to see implemented in their areas. The survey was implemented via a Google Form and sent via email to potential participants.

The survey received four responses from businesses, all of which were in State MID counties

Figure 1. Respondents by County



The types of businesses that responded to the survey were diverse, including one of each of the following:

- Low income housing
- Health provider
- Family Entertainment Center
- Commercial Retail

The results of the quantitative survey questions were analyzed using simple descriptive statistics and are presented by survey question below.

Disaster Impact

Of the four respondents, three indicated that their business was affected by the 2017 disaster. All three cited lost accessibility to business for customers, while wind damage, flooding and water damage were also reported. Two businesses reported approximately \$100,000 in damage or lost revenue, while one business reported less than \$10,000 in damage and lost revenue. None of the three businesses reported receiving assistance from the SBA for this disaster event.

Figure 2. Types of Damage

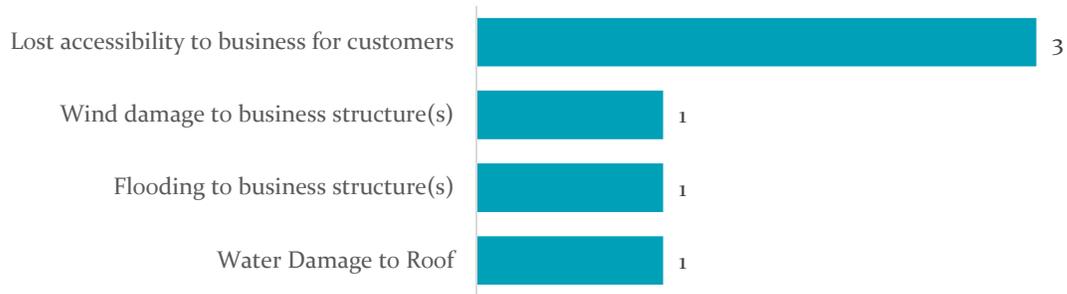
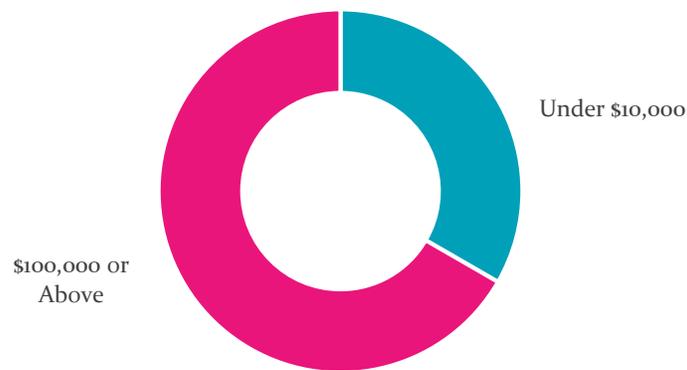


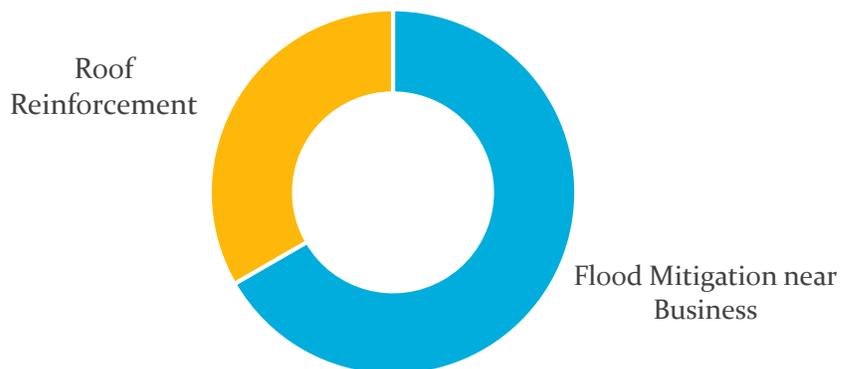
Figure 3. Amount of Damage



WHAT TYPE OF MITIGATION ACTIVITY WOULD MAKE YOUR BUSINESS MORE RESILIENT FOR SIMILAR FUTURE DISASTERS?

Of the three respondents who experienced impacts from the 2017 disaster, two of them selected flood mitigation as a mitigation activity that would improve their resiliency. One business selected roof reinforcement.

Figure 4. Types of Mitigation Activities



APPENDIX 3 - CITIZEN PARTICIPATION PLAN

State of Missouri Citizen Participation Plan for State CDBG, CDBG-DR, And CDBG-MIT

1. PURPOSE

The State of Missouri has adopted a Citizen Participation Plan (CPP) that sets forth the State's procedures for citizen participation in the development and implementation of HUD funded activities and programs. Substantial amendments to the Consolidated Plan and Action Plans for State CDBG, Action Plans for CDBG-DR and CDBG-MIT, and the Assessment of Fair Housing (AFH) will also require public notice and engagement.

The state of Missouri constructs a thorough citizen participation plan that encourages citizens to participate in the development of:

- The five-year Consolidated Plan (State HUD Programs)
- Annual action plans (State HUD Programs)
- Assessment of Fair Housing (AFH)
- Mitigation Action Plan (CDBG-MIT)
- Disaster Recovery Action Plan (CDBG-DR)

The citizen participation plan was developed in accordance with the requirements listed in 24 CFR Part 91.115 (Citizen Participation Plan for States) and HUD requirements contained in the relative Federal Register Notices allocating funds for disaster recovery and mitigation. These requirements are designed specially to encourage participation by low- and moderate-income persons, particularly those living in blighted areas and/or disaster impacted communities, and those living in areas where CDBG, CDBG-DR, and CDBG-MIT funds are proposed to be used. The plan provides citizens (including minorities, the disabled, and non-English speaking persons), units of local government, Tribes, Continuums of Care, organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) and other interested parties a reasonable opportunity to comment on the plan and encourages them to do so.

2. OUTREACH

The Missouri Department of Economic Development (MO-DED), as Lead Agency for the State of Missouri HUD grants, will ensure all HUD requirements for citizen engagement are met. Prior to the release and following the publication of any plan (Draft Consolidated Plan, Action Plans, or AFH), the State will use several techniques that encourage the development of a shared vision of change for the community and the review of program performance. The techniques are clarified throughout the length of the Citizen Participation Plan. In summary they include:

- i. Informational Meetings and Public Hearings
- ii. Webinars
- iii. Postings on the Department of Economic Development (DED) and Missouri Housing Development Commission (MHDC) websites
- iv. DED and MHDC community emails
- v. Notices provided to local governments and other local partners via the states' regional planning commissions and councils of government, the Missouri Municipal League, and the Missouri Association of Counties

The Disaster Recovery and Mitigation Action Plans will also be supported by:

- vi. Postings and notices on the CDBG-DR web page and the Mitigation web page (subsite of the CDBG-DR web page) housed on the DED website.
- vii. Formation of one or more Citizen Advisory Committees
- viii. Formal invitation to key stakeholders, including any separate agency of the jurisdiction that is responsible for the development of FEMA Hazard Mitigation Plan, including the State Hazard Mitigation Officer.

The State of Missouri will provide citizens and units of general local government a reasonable opportunity to comment on the CPP and any subsequent substantial CPP amendments and will make the CPP available to the public.

3. CITIZEN PARTICIPATION PLAN AND ACCESSIBILITY FOR CDBG, CDBG-DR, AND CDBG-MIT

To ensure minorities and persons with disabilities have prior notice and access to the public hearings, MO-DED will take the following actions:

- Announce public hearings to organization that represent minorities and person with disabilities at least 10 days prior to the public hearing date(s).
- Include a statement in notices of public hearings indicating that participants in the hearings may request language interpretation to assist in their participation.
- Include a statement in notices of public hearings that location of the meetings are accessible to person with physical disabilities.
- Include a statement in notices of that participants can request reasonable accommodations from the State to participate in public meetings.
- Notify organizations that represent minorities that every reasonable effort will be made to translate documents including having documents on the State's website translatable using "Google Translate".

Residents who require special accommodations to attend the hearing, should contact the state by emailing Daniel Engler, Daniel.engler@ded.mo.gov and/or calling 573-751-3600 to make advance arrangements. For hearings that are held in areas that meet the minimum threshold for LEP accommodations, Spanish translations will be provided through translated closed captioning (CART).

MO-DED provides guidance to its Units of Local Government (UGLG) on developing a local language access plan (LAP). This guidance is provided with this document as Attachment A. Provisions for interpretation shall be made for limited English proficiency (LEP) residents to encourage and ensure meaningful access to participation for public hearings, communication materials, websites, public comments, etc.

4. Regular State CDBG Consolidated Plan and Annual Action Plan - Public Notice and Comment Period

Every 5 years the State of Missouri completes a Consolidated Plan for its HUD funded programs and an Annual Action Plan each subsequent year. Before the State adopts the Consolidated Plan, residents, public agencies and other interested parties are given access to information about the programs involved in the plan, including:

1. The amount of assistance the State expects to receive,
2. The range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income,
3. The plans to minimize displacement of persons and to assist any persons displaced.

Prior to the start of the Consolidated Plan or annual Action Plan process, the State will hold an informational meeting each year approximately 45 days prior to the release of the draft Plans which will inform the public and interested parties of the upcoming Consolidated Plan/Action Plan process.

The State will provide notice of this meeting via the following methods:

- Notice posted on Department of Economic Development and Missouri Housing Development Commission websites
- Notice provided to local governments and other local partners via the states' regional planning commissions and councils of government, the Missouri Municipal League, and the Missouri Association of Counties
- Department of Economic Development community group emails (approximately 4,000 communities and community organizations statewide)
- Missouri Housing Development Commission community group emails
- State's public housing agencies
- Missouri Commission on Human Rights
- State's community action agencies

Publishing the plan with reasonable opportunity for public review

The State will make every effort to publish the proposed Consolidated Plan in a manner that affords residents, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments.

Website

To notify the public of the plans' availability, MO-DED will post the CDBG Consolidated Plan and Action Plans on the State CDBG web page: www.ded.mo.gov.

Additionally, public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan is also sent to other partner state agencies and via email to identify the locations where the plans will be available as well as a schedule of upcoming public hearings. The announcement will also explain that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments. The State will provide a free copy of the plans to interested parties upon request and will make the plan available during the hearings. A press release will be issued statewide, notifying the public of the Action Plan or Consolidated Plan process, the opportunity to review the plan, and the schedule of public hearings.

Public Hearings

The State will conduct at least one "in-person" public meeting in Jefferson City during the 30-day comment period and will conduct another public meeting via webinar. Instructions for joining webinar will be provide in the public hearing notices.

All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency (LEP). Both in-person and webinar hosted hearings will be promoted through a statewide press release, posting on the CDBG website and notices placed in newspapers in geographic proximity to the location of the hearing.

Time period for comments

The State provides approximately 30-days to receive comments from residents and units of local government on the plans (Consolidated Plan; Action Plan; AFH). During that time period, the State schedules at least four public hearings around the state to distribute copies of the plan and discuss the plan with the public. The public hearings give the state the opportunity to present the content of the plan (Consolidated Plan; Action Plan; AFH) and receive and record comments from the public.

The plan will be available on the DED website (www.ded.mo.gov) and the MHDC website (www.mhdc.com).

Consideration of Public Comments

The State considers any comments or views of residents and units of general local government received in writing or orally at the public hearings, in preparing the final consolidated plan. A summary of these comments, including those not accepted and reasons therefore, will be attached to the final AFH, Action Plan or Consolidated Plan.

SUBSTANTIAL AMENDMENT

Substantial amendments to either the Action Plan, Consolidated Plan or the AFH will require public notice. The thresholds for a substantial amendment are as follows:

- a. Action Plan or Consolidated Plan – An amendment shall be considered substantial (requiring public notification and comment period) in the following events:
 - i. A new funding source be added to the Plan
 - ii. Actual annual allocations from HUD differ more than 10% of projected amount
 - iii. For the CDBG Program only, a new funding category is created or more than 25% of the annual allocation is transferred between funding categories
- b. Assessment of Fair Housing (AFH) – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:
 - i. A material change in circumstances that affects the information on which the AFH is based. Examples include, but are not limited to, a Presidentially declared disaster event that are of such a nature to impact the steps required to affirmatively further fair housing, significant demographic changes, new significant contributing factors in the State’s jurisdiction, and civil rights findings, determinations, settlements, or court orders,

The State will provide public notice of the substantial amendments to the plan and the subsequent hearings via the following methods:

- Notice posted on DED website (www.ded.mo.gov) and the MHDC website (www.mhdc.com).
- Notice provided to local governments and other local partners via the states’ regional planning commissions and councils of government, the Missouri Municipal League, and the Missouri Association of Counties
- Department of Economic Development community group emails (approximately 4,000 communities and community organizations statewide)
- Missouri Housing Development Commission community group emails
- State’s public housing agencies
- Missouri Commission on Human Rights
- State’s community action agencies

The State provides approximately 30-days to receive comments from residents and units of local government on the substantial amendments of the plan (Consolidated Plan; Action Plans; AFH).

- i. Written comments may be submitted by mail at P.O. Box 118, Jefferson City, MO 65109 and/or email at publiccomments@ded.mo.gov at any time during the public comment period and may be directed to any of the State participating agencies (departments of Economic Development, Health and Senior Services, and Social Services, and the Missouri Housing Development Commission).

The State considers any comments or views of residents and units of general local government received in writing or orally at the public hearings, in preparing the substantial amendment of the plans (Consolidated Plan; Action Plans; AFH). A summary of these comments, including those not accepted and reasons therefore, will be attached to the final AFH, action plan or consolidated plan.

PERFORMANCE REPORTS

The State provides reasonable notice and an opportunity to comment on performance reports made by the programs involved with Consolidated Plan and Annual Action Plan. Data contained in the performance reports is compiled and sent out approximately two months after the end of the program year. The program year associated with the Consolidated Plan ends on March 31 of each year.

Copies of the actual performance reports are mailed to 20 public agencies around the state, and notice of the performance report availability is made via mail to the Consolidated Plan mailing list. The public is provided a 30-day comment period and may submit written comments by mail at P.O. Box 118, Jefferson City, MO 65109 and/or email at publiccomments@ded.mo.gov at any time during the public comment period.

Comments received on the performance reports are recorded, and a summary of the comments is attached to the performance report which is submitted to no later than June 1 for the Consolidated Plan.

REQUIREMENTS FOR LOCAL GOVERNMENTS RECEIVING STATE CDBG FUNDS

Local government recipients of CDBG funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG project, with the exception of confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them.

Residents shall be provided adequate and timely information to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least:

1. The determination of needs;
2. The review of the proposed activities;
3. And the review of past program performance, in the following manner:
 - a. At least two public hearings shall be scheduled at times and locations felt to be most likely to make it possible for the majority of impacted persons to attend without undue inconvenience, addressing the three items above. At least one hearing must be held to address items (1) and (2) above prior to the submission of the application for housing and/or non-housing needs. Item 3 must be addressed in a public hearing to review performance of the recipient in a previous program and must occur prior to closeout of any loan or grant for which performance evaluation has not occurred in a previous hearing.
 - b. Notification of any and all hearings shall be given a minimum of five full days in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution. Additional advertisement may be conducted by posting letters, flyers and any other forms which seem practical; however, publication is required.
 - c. All hearings must be accessible to persons with disabilities. Provisions for interpretation shall be made at all public hearings for LEP residents if such residents are expected to be in attendance.

Action Plan Availability to the Public

The State will provide the Consolidated Plan and Annual Action Plan, as adopted, substantial amendments and the performance reports to the public. These documents are made available to the public electronically at (www.ded.mo.gov) and the MHDC website (www.mhdc.com).

The CDBG-DR Action plan and substantial amendments are made available at public hearings. All documents related to the consolidated plan are available upon request and will be provided to anyone requesting them. Materials will be provided in a form accessible to persons with disabilities or limited English proficiency (LEP) upon request. Requests may be made by email to Daniel Engler at Daniel.engler@ded.mo.gov or by calling 573-751-3600.

Access to Records

Residents, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the State's CDBG-DR Action Plan and the State's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials from previous 5 years are available to the public upon request. Requests may be made by email to info@ded.mo.gov or by calling Dan Engler, 573-751-3600.

Complaints

The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office. Any criticism submitted in writing at any time will be answered in writing within fifteen working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Complaints should be sent in writing to:

Daniel Engler, Policy and Planning Officer
P.O. Box 118
Jefferson City, MO 65109
Daniel.Engler@ded.mo.gov
573-751-3600

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1- 800-347-3735 or email: hotline@hudoig.gov).

Complaints regarding accessibility can be reported to the State's 504 Coordinator. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

State 504 Accessibility Coordinator:
Amy Werner, Compliance Specialist
MO Department of Economic Development
301 W. High Street, Suite 700
P.O. Box 118
Jefferson City, MO 65102
573-751-2039

Use of Citizen Participation Plan

The State will follow the citizen participation plan in full and to the best ability possible, as described above.

5. CDBG-DR Action Plans - Public Notice and Comment Periods

The State of Missouri is also the recipient of HUD CDBG-DR funds allocated through Federal Register Notices in response to Federally Declared Disasters in 2017 and 2019. These notices state that Citizen Participation is to follow the requirements for the Federal Register Notice issued August 14, 2018 (83 FR 40314). The Federal Register Notice waives regular citizen participation requirements and states requirements for notifying the public regarding use of the disaster CDBG funds (CDBG-DR).

CDBG-DR Citizen Participation Waiver (83 FR 40314, August 14, 2018)

Citizen participation waiver and alternative requirement. To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. The streamlined requirements do not mandate public hearings but do require the grantee to provide a reasonable opportunity (at least 30 days) for citizen comment and ongoing citizen access to information about the use of grant funds. The streamlined citizen participation requirements for a grant under this notice are:

- a. Publication of the action plan, opportunity for public comment, and substantial amendment criteria. Before the grantee adopts the action plan for this grant or any substantial amendment to the action plan, the grantee will publish the proposed plan or amendment. The manner of publication must include prominent posting on the grantee's official website and must afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan or amendment's contents. The topic of disaster recovery should be navigable by citizens from the grantee's (or relevant agency's) homepage. Grantees are also encouraged to notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

CDBG-DR Action Plan

The MO-DED will post the draft CDBG-DR Action Plan or any Substantial Amendment for at least 30 days of public comment on the CDBG-DR website:

<https://ded.mo.gov/DisasterRecovery>. Notice of all hearings will be posted a minimum of 10 business days prior to public hearings.

The state makes every effort to publish the draft CDBG-DR Action Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. To do this, the current draft of the CDBG-DR Action Plan was published and made available to the public for 30 days. The plan will remain available on the DED website <https://ded.mo.gov/DisasterRecovery>.

To notify the public of the plan's availability, public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan is also sent to other partner state agencies. The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments, as the state will also provide a copy of the plans to interested parties upon request. The state will make the plan available for a minimum 30-day comment period.

The state considers any comments or views of citizens and units of general local government received in writing or orally in preparing the final CDBG-DR Action Plan. A summary of these comments, including those not accepted and reasons, therefore, will be attached to the final CDBG-DR Action Plan.

Website

To notify the public of the CDBG-DR Plan's availability, MO-DED will post the CDBG-DR Action Plan and Substantial Amendments on the CDBG-DR web page: <https://ded.mo.gov/DisasterRecovery>. The CDBG-DR web page is linked to the State's main website: <https://ded.mo.gov/> and the CDBG-MIT web page: CDBG-MIT address <https://ded.mo.gov/programs/cdbg/mitigation>. For further information regarding the website content please see Attachment B - Website Policy.

Additionally, public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan is also sent to other partner state agencies and via email to identify the locations where the plans will be available as well as a schedule of upcoming public hearings. The announcement will also explain that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments. The State will provide a free copy of the plans to interested parties upon request and will make the plan available during the hearings. A press release will be issued statewide, notifying the public of the Action Plan or Consolidated Plan process, the opportunity to review the plan, and the schedule of public hearings.

Public Hearings

Per the Federal Register's streamlined approach for CDBG-DR, public hearings are not required during the 30-day comment period. The State may determine a public hearing(s) regarding the CDBG-DR funds is warranted for the purposes of more comprehensive

public involvement. If a public hearing is to be held regarding use of the CDBG-DR funds or a substantial amendment, the process below will be followed.

All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency (LEP). Both in-person and webinar hosted hearings will be promoted through a statewide press release, posting on the CDBG-DR website and notices placed in newspapers in geographic proximity to the location of the hearing for at least 10 business days prior to the hearing.

Time period for comments

The State provides at least 30-days for public comment from residents and units of local government on the plans CDBG-DR Action Plan.

The plan will be available on the DED CDBG-DR website (<https://ded.mo.gov/DisasterRecovery>) and the MHDC website (www.mhdc.com).

Consideration of comments

The State considers any comments or views of residents and units of general local government received in writing or orally in preparing the final CDBG-DR Action Plan. A summary of these comments will be attached to the final Action Plan or Substantial Amendment.

Substantial Amendment

Substantial Amendments to the CDBG-DR Action Plan will require at least 30-days of public notice. The public notice will be made in the same manner as prescribed in this document. The thresholds for a substantial amendment are as follows:

Action Plan – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:

- a. a new funding source be added to the Plan
- b. the addition or deletion of an activity
- c. a change in program benefit or eligibility criteria
- d. the allocation for a new funding category or reallocation of a monetary threshold more than 25% of the allocation transferred between funding categories not to exceed HUD established maximums

Requirements for Local Governments Receiving CDBG-DR Funds

Recipients of CDBG-DR funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of

applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG-DR project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them. Citizens shall be provided adequate and timely information, to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least the determination of needs, the review of the proposed activities, and the review of past program performance, in the following manner:

- 1) At least one public hearing shall be held prior to the submission of an application for housing and/or non-housing needs being submitted to the State for funding through the CDBG-DR program. Hearings shall be scheduled at a time and location felt to be most likely possible of the majority of interested citizens to attend without undue inconvenience. The development of needs and the review of the proposed activities and their possible environmental impact must be addressed at this hearing as reflected by minutes of the hearing. The hearing cannot be more than six months prior to application submittal.

The second required hearing is held to address the performance on the funded grant at a minimum of 80% completion. The review of performance (during the grant) must be addressed in public hearing prior to grant close-out. Proof of said hearing will be part of close-out documentation.

- 2) Notification of all hearings shall be given a minimum of five full days (actually seven days, as the day of the notice and the day of the hearing cannot be counted as one of the five full days) in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution, and/or by posting letters, flyers, and any other forms that are clearly documented with wide circulation.

All hearings must be accessible to handicapped persons. Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance. The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the decision-making time. Any criticism submitted in writing at any time should be answered in writing within fifteen working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Availability to the Public

The state will provide the Action Plan, as adopted, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at (<https://ded.mo.gov/DisasterRecovery>).

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the state's CDBG-DR Action Plan and the state's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the state has designated an appropriate and practicable procedure to handle complaints from residents related to the CDBG-DR Action Plan, substantial amendments, and performance reports. Upon receiving a complaint, the state will provide a timely, substantive written response to written citizen complains within a 15 working day time period.

Complaints should be sent in writing to:

Daniel Engler, Policy and Planning Officer
P.O. Box 118
Jefferson City, MO 65109
Daniel.Engler@ded.mo.gov
573-751-3600

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1- 800-347-3735 or email: hotline@hudoig.gov).

Complaints regarding accessibility can be reported to the State's 504 Coordinator. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

State 504 Coordinator:

Amy Werner, Compliance Specialist
MO Department of Economic Development
301 W. High Street, Suite 700
P.O. Box 118
Jefferson City, MO 65102
573-751-2039

Use of Citizen Participation Plan

The State will follow the citizen participation plan in full and to the best ability possible, as described above.

6. CDBG-MIT Action Plans – Public Notice and Comment Period

The State of Missouri has been allocated CDBG-MIT funds for mitigation activities to address identified risks resulting from the 2017 Federally Declared disasters (DR-4317). Activities funded with the CDBG-MIT funds must meet HUD’s definition of mitigation and 50% of funds must be expended in the HUD identified “most impacted and distressed (MID)” zip codes identified below. The CDBG-MIT Federal Register notice provided the waiver and requirements cited below regarding Citizen Participation for the CDBG-MIT funds.

CDBG-MIT Citizen Participation Waiver (84 FR 45838)

To permit a more robust process and ensure disaster recovery and mitigation activities are developed through methods that allow all stakeholders to participate, and because citizens recovering from disasters are best suited to ensure that grantees will be advised of any missed opportunities and additional risks that need to be addressed, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 § 91.105(b) and (c), and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. These revised requirements mandate public hearings (the number of which is based upon the amount of a grantee’s CDBG–MIT allocation) across the HUD-identified MID areas and require the grantee to provide a reasonable opportunity (at least 45 days) for citizen comment and ongoing citizen access to information about the use of grant funds.

HUD Identified Most Impacted and Distressed Areas from 2017 Disasters (DR-4317)



HUD MID Zip Codes	63935, 63965, 64850, 65616, 65775
HUD MID Counties	Carter, Douglas*, Howell, McDonald*, Newton, Reynolds*, Ripley, Taney

*Adjacent to county primarily containing MID but contains small section of MID Zip Code as well. To prevent exclusion in analysis, these counties are also considered MID Counties.

Remaining Counties Adversely Affected and Eligible for CDBG-MIT under DR-4317

State MID Counties	Barry, Barton, Bollinger, Boone, Butler, Camden, Cape Girardeau, Cedar, Christian, Cole, Crawford, Dade, Dallas, Dent, Dunklin, Franklin, Gasconade, Greene, Iron, Jasper, Jefferson, Lawrence, Madison, Maries, Miller, Mississippi, Morgan, New Madrid, Oregon, Osage, Ozark, Pemiscot, Perry, Phelps, Pike, Pulaski, Ralls, Scott, Shannon, St. Louis, Ste. Genevieve, Stone, Texas, Wayne, Webster, Wright
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CDBG-MIT Action Plan Development

The MO-DED will provide one or more opportunities for residents in the HUD identified MIDs to ask questions and provide input into the development of the CDBG-MIT draft Action Plan prior to being published on the CDBG-MIT website for public comment. The CDBG-MIT web page is located at: <https://ded.mo.gov/programs/cdbg/mitigation>.

To notify the public of the opportunity to ask questions or provide input during the development of the draft CDBG-MIT Action Plan public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League, Missouri Association of Councils of Government, and Missouri Association of Counties. The plan is also sent to other partner state agencies and Tribes. The public announcement explains that the public will be provided an overview of the purpose of the CDBG-MIT funds and their intended use. Interested parties are given a reasonable opportunity to provide input through written and oral options. Notice of all hearings will be posted a minimum of 10 business days prior to public hearings.

CDBG-MIT Action Plan

The MO-DED will post the draft CDBG-MIT Action Plan for at least 45 days of public comment on the CDBG-MIT web page: <https://ded.mo.gov/programs/cdbg/mitigation> which is linked to the State of Missouri’s main CDBG-DR disaster website located: <https://ded.mo.gov/DisasterRecovery>.

Additionally, to notify the public of the CDBG-MIT Action Plans availability, public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Municipal League and Missouri Association of Counties. The plan is also sent to other partner state agencies. The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments, as the state will also provide a copy of the plans to interested parties upon request.

The state will make the plan available for a minimum 45-day comment period.

All plan publication efforts and public hearings will comply with civil rights requirements, including meeting the effective communications requirements under Section 504 of the Rehabilitation Act (see, 24 CFR 8.6) and the Americans with Disabilities Act (see 28 CFR 35.160); and must provide meaningful access for persons with Limited English Proficiency (LEP) (see Attachment A for State's LEP Plan and Guidance).

The state considers any comments or views of citizens and units of general local government received in writing or orally in preparing the final CDBG-MIT Action Plan. A summary of these comments, including those not accepted and reasons, therefore, will be attached to the final CDBG-MIT Action Plan.

Website

To notify the public of the CDBG-MIT Action Plan's availability, MO-DED will post the Plan on the State's CDBG-MIT web page: <https://ded.mo.gov/programs/cdbg/mitigation>. The CDBG-MIT web page is linked to the State's CDBG-DR website: <https://ded.mo.gov/DisasterRecovery> and the main State CDBG web page: <https://ded.mo.gov/>. For further information regarding the website content please see Attachment B Website Policy.

Additionally, public notification is provided via newsletter, press release, direct email and via partnering associations such as the Missouri Association of Council of Governments (COGs), Missouri Municipal League and Missouri Association of Counties. The plan is also sent to other partner state agencies and via email to identify the locations where the plans will be available as well as a schedule of upcoming public hearings. The announcement will also explain that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments. The State will provide a free copy of the plans to interested parties upon request and will make the plan available during the hearings. A press release will be issued statewide, notifying the public of the CDBG-MIT Action Plan process, the opportunity to review the plan, and the schedule of public hearings.

Action Plan Public Hearings

The State will conduct at least one pre-draft public meeting in the HUD MIDs prior to publishing the Draft CDBG-MIT Action Plan. After the draft CDBG-MIT Action Plan is posted, there will be a 45-day comment period and will conduct at least one public hearing in a different location in the HUD MIDs. Additional hearing which may be in-person or via webinar may be scheduled if the State determines it is beneficial for development of the CDBG-MIT Action Plan. Instructions for joining webinar will be provide in the public hearing notices.

All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited

English proficiency (LEP). Both in-person and webinar hosted hearings will be promoted through a statewide press release, posting on the CDBG-MIT website and notices placed in newspapers in geographic proximity to the location of the hearing.

Time Period for Public Comments

The State provides approximately 45-days to receive comments from residents and units of local government on the CDBG-MIT Action Plan. During that time period, the State schedules at least one public hearing in the HUD MIDs to distribute copies of the plan and discuss the plan with the public. The public hearings give the state the opportunity to present the content of the CDBG-MIT Action Plan and receive and record comments from the public.

The plan will be available on the DED CDBG-MIT website:

<https://ded.mo.gov/programs/cdbg/mitigation> and the MHDC website www.mhdc.com.

Consideration of Public Comments

The State considers any comments or views of residents and units of general local government received in writing or orally at the public hearings, in preparing the final CDBG-MIT Action Plan. A summary of these comments, including those not accepted and reasons, therefore, will be attached to the final CDBG-MIT Action Plan.

Substantial Amendment

Substantial Amendments to the CDBG-MIT Action Plan will require public notice and posting on the CDBG-MIT website for 30 days public comment. The public notice will be made in the same manner as prescribed in this document. The thresholds for a substantial amendment are as follows:

Action Plan – an amendment shall be considered substantial (requiring public notification and comment period) in the following events:

- a. a new funding source be added to the Plan
- b. the addition or deletion of an activity
- c. a change in program benefit or eligibility criteria
- d. the allocation for a new funding category or reallocation of a monetary threshold more than 25% of the allocation transferred between funding categories not to exceed HUD established maximums

Requirements for Local Governments Receiving CDBG-MIT Funds

Recipients of CDBG-MIT funds must comply with the State Citizen Participation Plan requirements as found in 24 CFR 570. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of

applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG-MIT project, except for confidential matters relating to housing and economic development programs, shall be open to examination by all residents.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them. Citizens shall be provided adequate and timely information, to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least the determination of needs, the review of the proposed activities, and the review of past program performance, in the following manner:

- 1) At least one public hearing shall be held prior to the submission of an application for housing and/or non-housing needs being submitted to the State for funding through the CDBG-MIT program. Hearings shall be scheduled at a time and location felt to be most likely possible of the majority of interested citizens to attend without undue inconvenience. The development of needs and the review of the proposed activities and their possible environmental impact must be addressed at this hearing as reflected by minutes of the hearing. The hearing cannot be more than six months prior to application submittal.

The second required hearing is held to address the performance on the funded grant at a minimum of 80% completion. The review of performance (during the grant) must be addressed in public hearing prior to grant close-out. Proof of said hearing will be part of close-out documentation.

- 2) Notification of all hearings shall be given a minimum of five full days (actually seven days, as the day of the notice and the day of the hearing cannot be counted as one of the five full days) in advance to allow citizens the opportunity to schedule their attendance. Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution, and/or by posting letters, flyers, and any other forms that are clearly documented with wide circulation.

All hearings must be accessible to handicapped persons. Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance. The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the decision-making time. Any criticism submitted in writing at any time should be answered in writing within fifteen working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Availability to the Public

The MO-DED will provide the CDBG-MIT Action Plan, as adopted, substantial amendments, use of funds and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at CDBG-MIT web page:

<https://ded.mo.gov/programs/cdbg/mitigation>.

CDBG-MIT Citizen Advisory Committees

The MO-DED will form one or more CDBG-MIT Citizen Advisory Committees to meet no less than twice annually to provide increased transparency in the implementation of the CDBG-MIT funds. The Committee will meet in an open forum to solicit and respond to public comment and input regarding the State's mitigation activities. The Committee will serve as an on-going public forum to continuously inform the State's CDBG-MIT projects and programs.

Notice of the Citizen Advisory Committee activities including meeting times and places, meeting materials and reports, meeting minutes, and other relevant items will be posted on the CDBG-MIT web page: <https://ded.mo.gov/programs/cdbg/mitigation>.

Access to Records

Residents, public agencies and other interested parties are given reasonable and timely access to the information and records relating to the State's CDBG-MIT Action Plan and the State's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the state has designated an appropriate and practicable procedure to handle complaints from citizens related to the consolidated plan, amendments, and performance reports. Upon receiving a complaint, the state will provide a timely, substantive written response to written citizen complaints within a fifteen working day time period.

Complaints should be sent in writing to:

Daniel Engler, Policy and Planning Officer
P.O. Box 118
Jefferson City, MO 65109
Daniel.Engler@ded.mo.gov
573-751-3600

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1- 800-347-3735 or email: hotline@hudoig.gov).

Complaints regarding accessibility can be reported to the State's 504 Coordinator. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.

State 504 Coordinator:

Amy Werner, Compliance Specialist
MO Department of Economic Development
301 W. High Street, Suite 700
P.O. Box 118
Jefferson City, MO 65102
573-751-2039

Attachment A: Missouri CDBG, CDBG-DR, and CDBG-MIT Grantee Language Access Plan Guidance

This document provides additional guidance on how to accomplish timely and reasonable steps to provide Limited English Proficient (LEP) persons with meaningful access to programs and activities funded by the federal government and awarded by MO CDBG, CDBG-DR, and CDBG-MIT. Refer to the CDBG LAP Policy and the Civil Rights section of the CDBG Administrative Manual, then complete the steps described in detail below to develop a local LAP:

STEP 1: PROVIDE GENERAL INFORMATION:

Provide the following information at the beginning of the local government's Language Access plan

- Grantee
- CDBG Grant Number
- Target Area
- Preparer's name, phone number, email address

STEP 2: CONDUCT A FOUR-FACTOR ANALYSIS TO DETERMINE HOW TO PROVIDE NEEDED LANGUAGE ASSISTANCE

Recipients are required to take reasonable steps to ensure meaningful access to LEP persons. This "reasonableness" standard is intended to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations. Use data to answer the question:

- How many Limited English Proficient people are in your local government's city or county's jurisdiction?
- Attach maps (if applicable) or other relevant data to your Language Access Plan. All data or maps provided must be accurately sourced.

As a starting point, a recipient may conduct an individualized assessment that balances the following four factors:

FACTOR 1: DETERMINE THE NUMBER OF LEP PERSONS SERVED OR ENCOUNTERED IN THE ELIGIBLE SERVICE POPULATION

Most grantees will depend on the most recent release of data from the American Community Survey Table B16001 and Table S1601, updated each year in December, to determine the number of LEP persons in the service area. In the case where the overall jurisdiction numbers fall below the Safe Harbor thresholds to provide translated written

documents but existing or planned CDBG target areas exist, the CDBG grantee must evaluate whether there are LEP households within the target areas that may need notification or other LAP services. The grantee’s evaluation should use local knowledge or data or other relevant data in conducting its evaluation and should indicate its conclusions regarding the steps necessary reach

out to these households in the language they speak to ensure that adequate notification is achieved. This evaluation will be particularly important for housing grants where eligible applicants for assistance may need application or other documents translated to take advantage of available services. All data provided must be accurately sourced. The size of the language group determines the recommended provision for written language assistance, as determined by the “safe harbors” outlined in the federal register, 72 FR 2732.

TABLE 1- SAFE HARBOR THRESHOLDS

Size of Language Group	Recommended Provision of Written Language Assistance
100 or more in the eligible population	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1000 in number	No written translation is required

A vital document is any document that is critical for ensuring meaningful access to the grantees' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in is not provided accurately or in a timely manner. Where appropriate, grantees are encouraged to create a plan for consistently determining, over time and across its various activities, what documents are "vital" to the meaningful access of the LEP populations they serve. Leases, rental agreements and other housing documents of a legal nature enforceable in U.S. courts should be in English.

FACTOR 2: THE FREQUENCY WITH WHICH LEP PERSONS COME INTO CONTACT WITH THE PROGRAM:

Grantees should assess, as accurately as possible, the frequency with which they have or should have contact with an LEP individual from different language groups seeking assistance. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual’s program or activity contact is unpredictable or infrequent. But even recipients that serve LEP persons on an unpredictable or infrequent basis should determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate. It may be as

simple as being prepared to use one of the commercially available telephonic interpretation services to obtain immediate interpreter services. In applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.

For CDBG, CDBG-DR, and CDBG-MIT grants, grantees must engage with the public at these critical steps:

- When notifying the public about a grant award application and its proposed activities
- When notifying the public about the grant award and its funded activities
- When seeking applicants to participate in the program (e.g., when seeking homeowners for rehabilitation assistance)
- When seeking qualified contractors
- When working with homeowners selected for assistance
- When seeking bids from builders to construct the homes
- When notifying the public about the grant award closeout and its accomplishments

Answer the following questions:

1. What is the nature of the program? e.g. providing improved water and sewer services.
2. What is the importance of the program?
3. Would denial or delay of access to services or information have serious or even life-threatening implications for the LEP individual?

FACTOR 3: THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE PROVIDED BY THE PROGRAM:

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP persons, the more likely the need for language services. The grantee needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual. Decisions by HUD, another federal, state, or local entity, or the recipient to make a specific activity compulsory in order to participate in the program, such as filling out particular forms, participating in administrative hearings, or other activities, can serve as strong evidence of the program's importance.

Determine the resources to be made available if any.

FACTOR 4: THE RESOURCES AVAILABLE AND COSTS TO THE RECIPIENT:

Language assistance that a grantee might provide to LEP persons includes, but is not limited to

- a) Oral interpretation services;
- b) Bilingual staff;
- c) Telephone service lines interpreter;
- d) Written translation services;
- e) Notices to staff and subrecipients of the availability of LEP services; or
- f) Referrals to community liaisons proficient in the language of LEP persons.
- g) Provide "I speak" card, available at <https://www.lep.gov/ISpeakCards2004.pdf>
- h) Use of the many brochures, handbooks, booklets, factsheets, and forms that are available in multiple languages on the HUD website:
https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep#Booklets

A recipient's level of resources and the costs that would be imposed on it may have an impact on the nature of the steps it should take. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Resource and cost issues, however, can often be reduced by technological advances; sharing of language assistance materials and services among and between recipients, advocacy groups, and federal grant agencies; and reasonable business practices. Where appropriate, training bilingual staff to act as interpreters and translators, information sharing through industry groups, telephonic and video conferencing interpretation services,

pooling resources and standardizing documents to reduce translation needs, using qualified translators and interpreters to ensure that documents need not be "fixed" later and that inaccurate interpretations do not cause delay or other costs, centralizing interpreter and translator services to achieve economies of scale, or the formalized use of qualified community volunteers, for example, may help reduce costs. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. Small recipients with limited resources may find that entering into a bulk telephonic interpretation service contract will prove cost effective.

Large entities and those entities serving a significant substantiated before using this factor as a reason to limit language assistance. Such recipients may find it useful to articulate, through documentation or in some other reasonable manner, their process for determining that language services would be limited based on resources or costs.

The four-factor analysis necessarily implicates the “mix” of LEP services the recipient will provide. Recipients have two main ways to provide language services: Oral interpretation in person or via telephone interpretation service (hereinafter “interpretation”) and through written translation (hereinafter “translation”). Oral interpretation can range from on-site interpreters for critical services provided to a high volume of LEP persons through commercially available telephonic interpretation services. Written translation, likewise, can range from translation of an entire document to translation of a short description of the document. In some cases, language services should be made available on an expedited basis, while in others the LEP individual may be referred to another office of the recipient for language assistance. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis. For instance, a public housing provider in a largely Hispanic neighborhood may need immediate oral interpreters available and should give serious consideration to hiring some bilingual staff. (Of course, many have already made such arrangements.) By contrast, there may be circumstances where the importance and nature of the activity and number or proportion and frequency of contact with LEP persons may be low and the costs and resources needed to provide language services may be high – such as in the case of a voluntary public tour of a recreational facility – in which pre-arranged language services for the particular service may not be necessary. Regardless of the type of language service provided, quality and accuracy of those services can be critical in order to avoid serious consequences to the LEP person and to the recipient. Recipients have substantial flexibility in determining the appropriate mix.

STEP 3: PREPARE A LANGUAGE ACCESS PLAN (LAP) AND SUBMIT IT TO YOUR CDBG FIELD REP THAT INCLUDES:

After completing the four-factor analysis and deciding what language assistance services are appropriate, grantees must develop a Language Assistance Plan to address identified needs of the LEP populations it serves. An effective LAP should include:

- The Four Factor Analysis
- The points and types of contact the agency and staff may have with LEP persons
- The procedures the grantee will use to identify LEP individuals who need language assistance
- Ways in which language assistance will be provided by the grantee
- A list of vital documents to be translated (if necessary)
- The grantee’s plan for training staff members on LEP guidance and the LAP
- The grantee’s plan for monitoring and updating the LAP
- A plan for complaints and appeals

LANGUAGE ACCESS PLAN FREQUENTLY ASKED QUESTIONS

Who are limited English proficient (LEP) persons?

Persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand. For purposes of Title

VI and the LEP Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.

What is Title VI and how does it relate to providing meaningful access to LEP persons?

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

What do Executive Order (EO) 13166 and the Guidance require?

EO 13166, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance.

Who must comply with the Title VI LEP obligations?

All programs and operations of entities that receive financial assistance from the federal government, including but not limited to state agencies, local agencies and for-profit and non-profit entities, must comply with the Title VI requirements. A listing of most, but not necessarily all, HUD programs that are federally assisted may be found at the "List of Federally Assisted Programs" published in the Federal Register on November 24, 2004 (69 FR 68700). Sub-recipients must also comply (i.e., when federal funds are passed through a recipient to a sub-recipient). As an example, Federal Housing Administration (FHA) insurance is not considered federal financial assistance, and participants in that program are not required to comply with Title VI's LEP obligations, unless they receive federal financial assistance as well. [24 CFR 1.2 (e)].

Does a person's citizenship and immigration status determine the applicability of the Title VI LEP obligations?

United States citizenship does not determine whether a person is LEP. It is possible for a person who is a United States citizen to be LEP. It is also possible for a person who is not a United States citizen to be fluent in the English language. Title VI is interpreted to apply to citizens, documented non-citizens, and undocumented non-citizens. Some HUD programs require recipients to document citizenship or eligible immigrant status of

beneficiaries; other programs do not. Title VI LEP obligations apply to every beneficiary who meets the program requirements, regardless of the beneficiary's citizenship status.

What is expected of recipients under the Guidance?

The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP. HUD recognizes that some projects' budgets and resources are constrained by contracts and agreements with HUD. These constraints may impose a material burden upon the projects. Where a HUD recipient can demonstrate such a material burden, HUD views this as a critical item in the consideration of costs in the four-factor analysis. However, refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI. The agency may, for example, have a contract with another organization to supply an interpreter when needed; use a telephone service line interpreter; or, if it would not impose an undue burden, or delay or deny meaningful access to the client, the agency may seek the assistance of another agency in the same community with bilingual staff to help provide oral interpretation service.

What are examples of language assistance?

Language assistance that a grantee might provide to LEP persons includes, but is not limited to:

- Oral interpretation services;
- Bilingual staff;
- Telephone service lines interpreter;
- Written translation services;
- Notices to staff of the availability of LEP services; or
- Referrals to community liaisons proficient in the language of LEP persons.

How may a grantee determine the language service needs of a beneficiary?

Grantees should elicit language service needs from all prospective beneficiaries (regardless of the prospective beneficiary's race or national origin). If the prospective beneficiary's response indicates a need for language assistance, the grantee may want to give applicants or prospective beneficiaries a language identification card (or "I speak" card). Language identification cards invite LEP persons to identify their own language needs. Such cards, for instance, might say "I speak Spanish" in both Spanish and English, "I speak Vietnamese" in both Vietnamese and English, etc. To reduce costs of compliance, the federal government has made a set of these cards available on the Internet located at: <https://www.lep.gov/resources/resources.html>.

How may a grantee's limited resources be supplemented to provide the necessary LEP services?

A grantee should be resourceful in providing language assistance as long as quality and accuracy of language services are not compromised. The grantee itself need not provide the assistance but may decide to partner with other organizations to provide the services. In addition, local community resources may be used if they can ensure that language services are competently provided. In the case of oral interpretation, for example, demonstrating competency requires more than self-identification as bilingual. Some bilingual persons may be able to communicate effectively in a different language when communicating information directly in that language but may not be competent to interpret between English and that language.

In addition, the skill of translating is very different than the skill of interpreting and a person who is a competent interpreter may not be a competent translator. To ensure the quality of written translations and oral interpretations, HUD encourages grantees to use members of professional organizations. Examples of such organizations are national organizations, including American Translators Association (written translations), National Association of Judicial Interpreters and Translators, and International Organization of Conference Interpreters (oral interpretation); state organizations, including Colorado Association of Professional Interpreters and Florida Chapter of the American Translators Association; and local legal organizations such as Bay Area Court Interpreters.

While HUD recommends using the list posted on the official LEP website, its limitations must be recognized. Use of the list is encouraged, but not required or endorsed by HUD. It does not come with a presumption of compliance. There are many other qualified interpretation and translation providers, including in the private sector.

May grantees rely upon family members or friends of the LEP person as interpreters?

Generally, grantees should not rely on family members, friends of the LEP person, or other informal interpreters. In many circumstances, family members (especially children) or friends may not be competent to provide quality and accurate interpretations. Therefore, such language assistance may not result in an LEP person obtaining meaningful access to the grantees' programs and activities. However, when LEP persons choose not to utilize the free language assistance services expressly offered to them by the grantee but rather choose to rely upon an interpreter of their own choosing (whether a professional interpreter, family member, or friend), LEP persons should be permitted to do so, at their own expense. Grantees may consult HUD LEP Guidance for more specific information on the use of family members or friends as interpreters. While HUD guidance does not preclude use of friends or family as interpreters in every instance, HUD recommends that the grantee use caution when such services are provided.

Are leases, rental agreements and other housing documents of a legal nature enforceable in U.S. courts when they are in languages other than English?

Generally, the English language document prevails. The translated documents may carry a disclaimer. For example, "This document is a translation of a HUD-issued legal document. HUD provides this translation to you merely as a convenience to assist in your understanding of your rights and obligations. The English language version of this document is the official, legal, controlling document. This translated document is not an official document." Where both the landlord and tenant contracts are in languages other than English, state contract law governs the leases and rental agreements. HUD does not interpret state contract law. Therefore, s regarding the enforceability of housing documents of a legal nature that are in languages other than English should be referred to a lawyer well-versed in contract law of the appropriate state or locality. Neither EO 13166 nor HUD LEP Guidance grants an individual the right to proceed to court alleging violations of EO 13166 or HUD LEP Guidance.

In addition, current Title VI case law only permits a private right of action for intentional discrimination and not for action based on the discriminatory effects of a grantee's practices. However, individuals may file administrative complaints with HUD alleging violations of Title VI because the HUD grantee failed to take reasonable steps to provide meaningful access to LEP persons. The local HUD office will intake the complaint, in writing, by date and time, detailing the complainant's allegation as to how the state failed to provide meaningful access to LEP persons. HUD will determine jurisdiction and follow up with an investigation of the complaint.

Who enforces Title VI as it relates to discrimination against LEP persons?

Most federal agencies have an office that is responsible for enforcing Title VI of the Civil Rights Act of 1964. To the extent that a grantee's actions violate Title VI obligations, then such federal agencies will take the necessary corrective steps. The Secretary of HUD has designated the Office of Fair Housing and Equal Opportunity (FHOO) to take the lead in coordinating and implementing EO 13166 for HUD, but each program office is responsible for its grantees' compliance with the civil rights related program requirements (CRRPRs) under Title VI.

How does a person file a complaint if he/she believes the state is not meeting its Title VI LEP obligations?

If a person believes that the state is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD's local Office of FHOO. For contact information of the local HUD office, go to the HUD website or call the housing discrimination toll free hotline at 800-669- 9777 (voice) or 800-927-9275 (TTY).

What will HUD do with a complaint alleging noncompliance with Title VI obligations?

HUD's Office of FHEO will conduct an investigation or compliance review whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance with Title VI obligations by the state. If HUD's investigation or review results in a finding of compliance, HUD will inform the state in writing of its determination. If an investigation or review results in a finding of noncompliance, HUD also will inform the state in writing of its finding and identify steps that the state must take to correct the noncompliance. In a case of noncompliance, HUD will first attempt to secure voluntary compliance through informal means. If the matter cannot be resolved informally, HUD may then secure compliance by:

- a) Terminating the financial assistance of the state only after the state has been given an opportunity for an administrative hearing; and/or
- b) Referring the matter to DOJ for enforcement proceedings.

How will HUD evaluate evidence in the investigation of a complaint alleging noncompliance with Title VI obligations?

Title VI is the enforceable statute by which HUD investigates complaints alleging a grantee's failure to take reasonable steps to ensure meaningful access to LEP persons. In evaluating the evidence in such complaints, HUD will consider the extent to which the state followed the LEP Guidance or otherwise demonstrated its efforts to serve LEP persons. HUD's review of the evidence will include, but may not be limited to, application of the four-factor analysis identified in HUD LEP Guidance. The four-factor analysis provides HUD a framework by which it may look at all the programs and services that the grantee provides to persons who are LEP to ensure meaningful access while not imposing undue burdens on grantees.

What is a safe harbor?

A "safe harbor," in the context of this guidance, means that the grantee has undertaken efforts to comply with respect to the needed translation of vital written materials. If a grantee conducts the four-factor analysis, determines that translated documents are needed by LEP applicants or beneficiaries, adopts an LAP that specifies the translation of vital materials, and makes the necessary translations, then the grantee provides strong evidence, in its records or in reports to the agency providing federal financial assistance, that it has made reasonable efforts to provide written language assistance.

What "safe harbors" may grantees follow to ensure they have no compliance finding with Title VI LEP obligations?

HUD has adopted a "safe harbor" for translation of written materials, as outlined in Table 1 of this document. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Failure to provide written translations under these cited circumstances does not mean that the grantee is in noncompliance. Rather, the "safe harbors" provide a starting point for grantees to consider

Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;

- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and
- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the "safe harbor" would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

When HUD conducts a review or investigation, it will look at the total services the grantee provides, rather than a few isolated instances.

Is the grantee expected to provide any language assistance to persons in a language group when fewer than 5 percent of the eligible population and fewer than 50 in number are members of the language group?

HUD recommends that grantees use the four-factor analysis to determine whether to provide these persons with oral interpretation of vital documents if requested.

Are there "safe harbors" provided for oral interpretation services?

There are no "safe harbors" for oral interpretation services. Grantees should use the four-factor analysis to determine whether they should provide reasonable, timely, oral language assistance free of charge to any beneficiary that is LEP (depending on the circumstances, reasonable oral language assistance might be an in-person interpreter or telephone interpreter line).

What are the obligations of HUD grantees if they operate in jurisdictions in which English has been declared the official language?

In a jurisdiction where English has been declared the official language, a HUD grantee is still subject to federal nondiscrimination requirements, including Title VI requirements as they relate to LEP persons.

Where can I find more information on LEP?

Additional resources on HUD compliance policies and guidance can be found in the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons

Notice: <https://www.gpo.gov/fdsys/pkg/FR-2007-01-22/pdf/07-217.pdf>. Complete LEP resources and information for all federal programs can be found on this website:

<https://www.lep.gov/>.

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Attachment B: State of Missouri Website Policies and Procedures for CDBG-DR and CDBG-MIT

1. WEBSITE PURPOSE

The State of Missouri is currently creating and will maintain comprehensive websites for the U. S. Department of Housing and Urban Development (HUD), Community Development Block Grant-Disaster Recovery (CDBG-DR) in accordance with HUD requirements, as cited in Federal Register Notice, 83 FR 5844, February 9, 2018 (Prior Notice for 83 FR 40314, August 14, 2018 which allocated \$58,535,000 of CDBG-DR funds to Missouri). CDBG-DR funds must be used to address unmet needs (with a priority focus on housing) that can be tied-back to the 2017 disasters declared under DR-4317.

Concurrently, MO-DED will also create and maintain a CDBG Mitigation (CDBG-MIT) web page linked to the CDBG-DR web page in accordance with Federal Register Notice 84 FR 45838, August 30, 2019. CDBG-MIT funds must be used to address Mitigation Risks identified in the CDBG-MIT Action Plan. All CDBG-MIT activities must address mitigation of future disasters.

The websites serve as a central source for CDBG-DR and CDBG-MIT information and is intended to provide transparency into the State of Missouri's disaster recovery activities using these funds. The website will host: Action Plans and Amendments; Citizen Participation Policies; Public Hearing Notices; CDBG-DR and CDBG-MIT program policies, eligibility requirements, and steps to apply for funding; procurement policies, solicitations, and awarded contracts (including those procured by subrecipients); procedures for Complaints, Appeals, and fraud reporting; Quarterly Performance Reports (QPRs); expenditure projections and outcomes; and for CDBG-MIT, information on the Citizens Advisory Group for Mitigation.

The Lead Agency (i.e. Grantee) for Missouri's CDBG-DR and CDBG-MIT allocations has been designated as the Missouri Department of Economic Development (MO-DED). This department is also the Lead Agency for the State's annual CDBG allocation. MO-DED currently manages websites associated with the State's CDBG program.

2. WEBSITE CONTENT

The MO-DED website address for CDBG-DR is located:

<https://ded.mo.gov/DisasterRecovery>

The MO-DED website address for CDBG-MIT is located:

<https://ded.mo.gov/programs/cdbg/mitigation>

Each program page will have links to its counterpart (i.e., the CDBG-DR page will link to the CDBG-MIT page and vice versa).

Website locations will be printed on all program advertisements and outreach materials. The State of Missouri adheres to ADA compliant standards for website accessibility and readability. Content and website layout will be designed with best practices for adaptive use in mind. The State supports accommodations for citizens with limited English proficiency and will publish program documents in languages based on the need of non-English speaking communities.

The information that will be available for CDBG-DR on the MO-DED website will include but may not be limited to the following:

CDBG-DR Requirements

1. CDBG-DR Unmet Needs Assessment
2. CDBG-DR Action Plan and Amendments
3. CDBG-DR Announcements of Public Hearing(s)
4. Citizen Participation Plan
5. Accessibility and LEP requirements
6. Information on each CDBG-DR program, eligibility requirements, and steps to apply
7. CDBG-DR Appeals Procedure
8. CDBG-DR Citizen Complaint Procedures
9. List of all CDBG-DR Sub-Recipients and Contractors
10. CDBG-DR Procurement
 - a) Procurement Policies
 - b) Current RFPs
 - c) Eligibility for competitive sub-awards (if applicable)
 - d) Awarded contracts and sub-recipient contract summary
11. CDBG-DR Quarterly Performance Reports (QPR)
12. A link to CDBG-MIT web page
13. Additional reporting as required by HUD

CDBG-MIT Requirements

The information on the CDBG-MIT web page will include but may not be limited to:

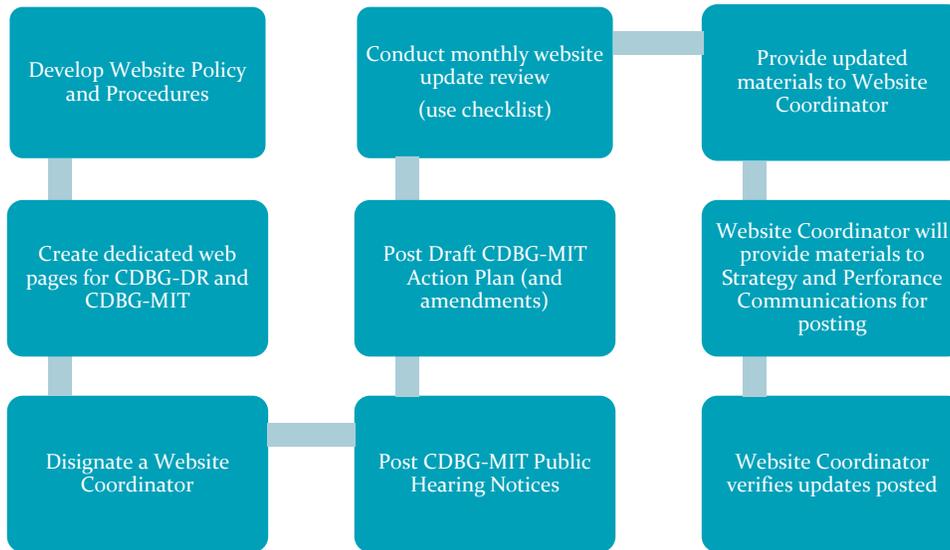
1. CDBG-MIT Risk Assessment
2. CDBG-MIT Action plans and amendments

3. CDBG-MIT Announcements and Public Hearings
4. Citizen Participation Plan
5. Accessibility and LEP requirements
6. Information on each CDBG-MIT program, eligibility requirements, and steps to apply
7. CDBG-MIT Appeals Procedures
8. CDBG-MIT Citizen Complaint Procedures
9. List of all CDBG-MIT Sub-Recipients and Contractors
10. CDBG-MIT Procurement
 - a. Procurement Policies
 - b. Current RFPs
 - c. Eligibility for competitive sub-awards
 - d. All awarded contracts to be paid with CDBG-MIT
11. CDBG-MIT Quarterly Performance Reports
12. CDBG-MIT Statistics/graphics displaying expenditures and outcomes to date and projections
13. A link to the CDBG-DR web page
14. Additional reporting as required by HUD
15. Information on the Citizen's Advisory Group for Mitigation

3. WEBSITE PROCESS

MO-DED Website Coordinator will ensure that the CDBG-DR and CDBG-MIT webpages are reviewed monthly and updated as required by this website policy. The Website Coordinator will use the Monthly Website Update Checklist to complete the review. The website will be reviewed on the 30th of each month and updated materials will be posted by the 15th of the following month.

Website Development and Administration Process



Responsible Staff

Responsible Position	Website Role	Contact Information
CDBG Policy and Planning	Website Coordinator	Daniel Engler Daniel.Engler@ded.mo.gov 573-751-3600
CDBG Financial Management Team	CDBG-DR Content Reviewer	Marcy Mealy marcy.mealy@ded.mo.gov 573-522-8569
CDBG Financial Management Team	CDBG-MIT Content Reviewer	Marcy Mealy marcy.mealy@ded.mo.gov 573-522-8569
Strategy and Performance Communication Team	CDBG-DR Content Approver	Maggie Kost Maggie.Kost@ded.mo.gov 573-751-9065
Strategy and Performance Communication Team	CDBG-MIT Content Approver	Maggie Kost Maggie.Kost@ded.mo.gov 573-751-9065
Strategy and Performance Communication Team	Website Content Manager (Upload docs to websites)	Maggie Kost Maggie.Kost@ded.mo.gov 573-751-9065