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Office of Community Development CDBG-DR Disaster Recovery Action Plan First Amendment

Montgomery County



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Executive Summary

Beginning Memorial Day evening, May 27, 2019, and into Tuesday, May 28, 2019, 21 EF-0 to EF-4 tornadoes struck Ohio, with nearly two-thirds of the touchdowns occurring in three adjacent counties in the Dayton region. The devastation in the Miami Valley was immense, and disproportionately impacted already economically distressed urban and densely populated areas. The storms damaged nearly 6,000 homes, of which nearly 1,200 incurred major damage or were destroyed. Additionally, the storms devastated some of the region's most vulnerable populations, cutting a path that disproportionately impacted high-poverty neighborhoods where many residents were underinsured or uninsured. The tornadoes dramatically impacted the business community, damaging nearly 400 commercial and industrial businesses. Two of the three counties that received both Public Assistance (PA) and Individual Assistance (IA) in the Presidential Disaster Declaration as a result of the tornadoes were in the Miami Valley Region. Prior to these tornadoes, Ohio's last declared emergency was more than 12 years ago.



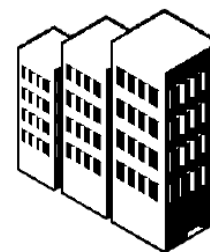
19
Tornadoes



Nearly 6,000
homes damaged



Nearly 1,200 homes
with major damage or
destroyed



Nearly 400
businesses damaged

Figure 1

Overall, the tornadoes' strength ranged from EF0 to EF4. Greene, Miami, and Montgomery counties experienced severe damage. The National Weather Service (NWS) initially declared the tornado that touched down outside Dayton as an EF3, but later determined it to be an EF4 after survey teams assessed the damage. Maximum winds were estimated at 170 miles per hour destroying buildings, utilities, and trees. According to the NWS, the tornado moved west across Montgomery County starting outside of Brookville and ending in Riverside. It was the first violent EF4+ tornado in Montgomery County since 1950.

Unfortunately, dozens of people were injured and one killed. On May 29, 2019, the National Weather Service issued 36 tornado warnings and one flash flood warning. People in Dayton reported hail the size of golf balls. The storms caused gas leaks, fires, power outages, and water supply shutdowns. Additional information will be provided below regarding indirect damages and secondary effects, damage estimates, demographic changes, immediate response, and community feedback.

On June 11, 2019, Governor Mike DeWine requested a major disaster declaration due to the severe storms, straight-line winds, tornadoes, flooding, and landslides from May 27, 2019 to May 29, 2019. On June 18, 2019, President Trump declared a major disaster existed in Ohio. The U.S. Department of Housing and Urban Development (HUD) allocated \$12,305,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the state. At least \$9,844,000, no less than 80%, must be

expended for recovery in the HUD-identified most impacted and distressed (MID) area - ZIP Code 45426, the City of Trotwood, in Montgomery County. However, HUD will allow the most impacted area to be categorized and utilized countywide. Therefore, the State of Ohio will utilize all CDBG-DR funds countywide in the MID county, Montgomery County. Due to the extreme damage the storms inflicted on housing, Ohio will utilize the CDBG-DR funds to construct new or rehabilitate multifamily housing and provide housing rehabilitation and repairs, and new construction for single-family, homeowner households in Montgomery County.

Substantial Amendment Update Summary

Budget Update and addition of Planning Activity, page 85.

Change to Single-Family Programs eligible activities, page 98.

Addressed HUD comments on Action Plan submission #1, Appendix 4.

Part 1: Assessing the Current Situation

Pre-Disaster Conditions

County Information

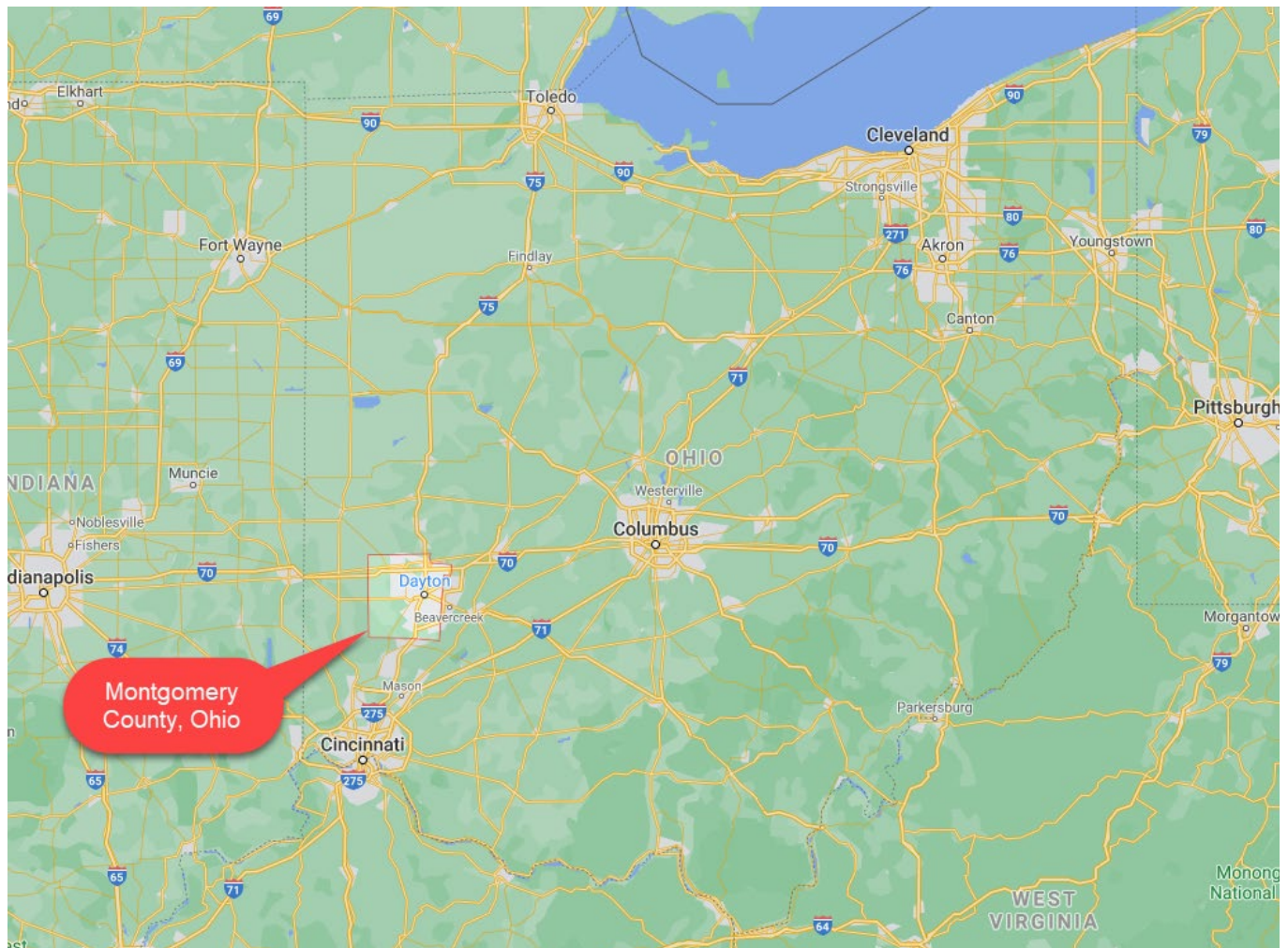
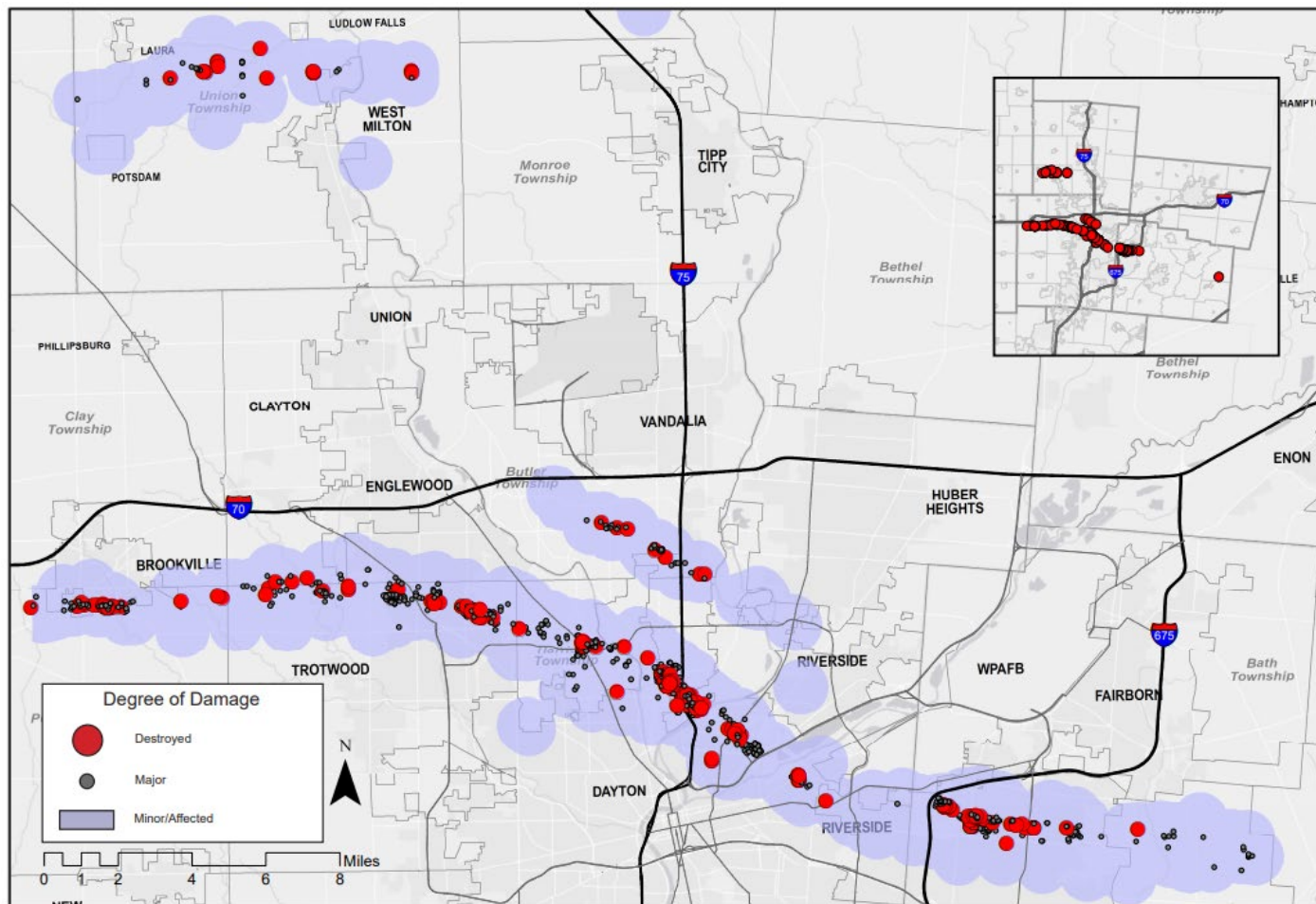


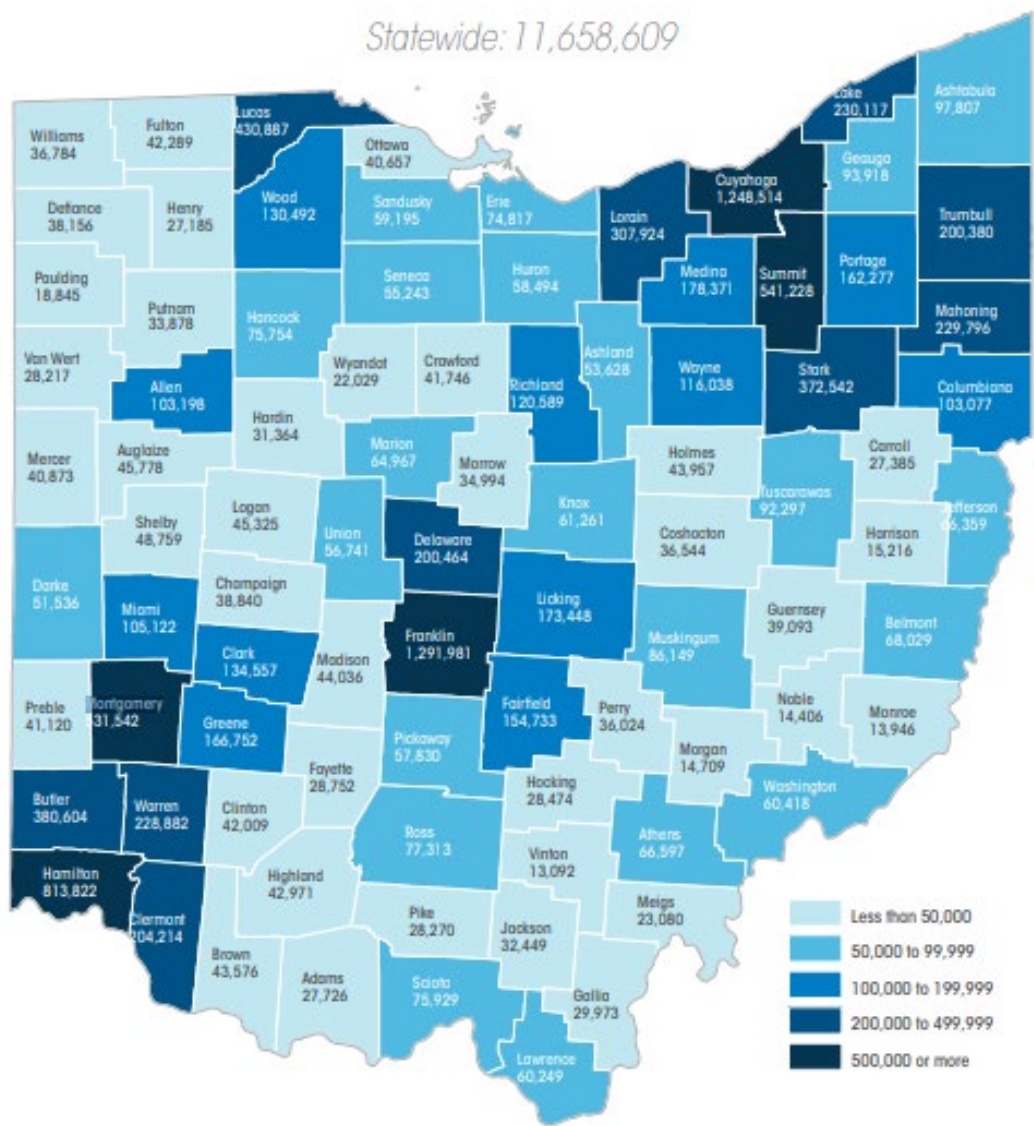
Figure 2: Montgomery County, Ohio

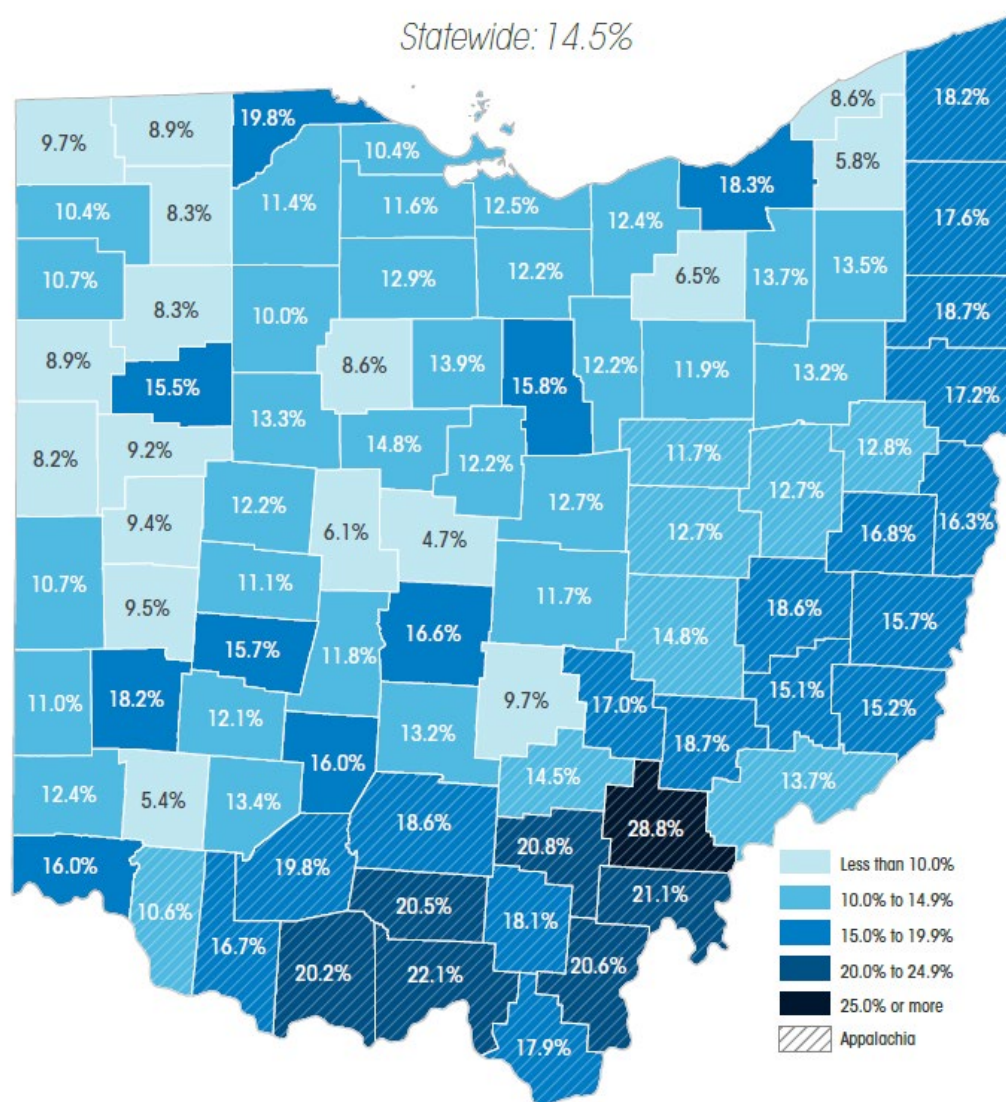
Figure 3: Miami Valley Region Memorial Day 2019 Tornado Damage Assessment



Montgomery County is located in southwest Ohio. It has state's fifth largest county population and has 28 municipalities and townships spanning 461.7 square miles. Dayton is the largest city and county seat. The land is 44.54% developed, 40.67% cultivated crops/hay and pasture, 12.91% forest land, and the remaining 1.88% is open water, barren, or shrub/scrub and grassland. The total population is 532,000

with 39 as the median age. The county's racial composition is 73.2% white, 20.6% African American, and 6.2% of other races. (Development, 2018)





Source: 2016 Small Area Income and Poverty Estimates, U.S. Census Bureau

Figure 5: Overall Poverty Rate by County

Income, Poverty, and Property

The household median income is \$47,000 and increasing. Median monthly gross rent averages \$754 and the median monthly owners' costs average \$1,197. Fourteen percent of households are below the poverty line, with 55% of single women with children living below the poverty line. In total, the county has 254,840 housing units; 87.7% are occupied, and 12.3% are vacant. Homeowners occupy 61.2% of housing units, and renters occupy 38.8%. The median home value is \$112,000 and 77.7% of homes were built in or before 1979. Only 7% of homes were built in 2000 or later.

More than 390,000 renters in Ohio – 25% – experience severe housing cost burden, spending at least 50% of their income on rent and utilities. Standard measures of rent burden suggest rents above 30% of household income limit affording other basic household necessities; 47% of Ohio renters exceed this threshold. Renters in the Trotwood-Madison City school district in Montgomery County ranks 20 in the

state for school districts where renter-occupied households are experiencing severe housing cost burden.

Two Montgomery County school districts hit hard in the tornadoes already ranked in the state's top 20 school districts of students experiencing homelessness. Dayton City ranks 11 with 254, 1.9% of student enrollment experiencing homelessness, and Trotwood-Madison City is 18 with 175 students, 6.8% of student enrollment experiencing homelessness. (OHFA, 2019)

The figure below shows the point-in-time count of the homeless population over a 10-year period. Montgomery County ranked fifth highest in Ohio.

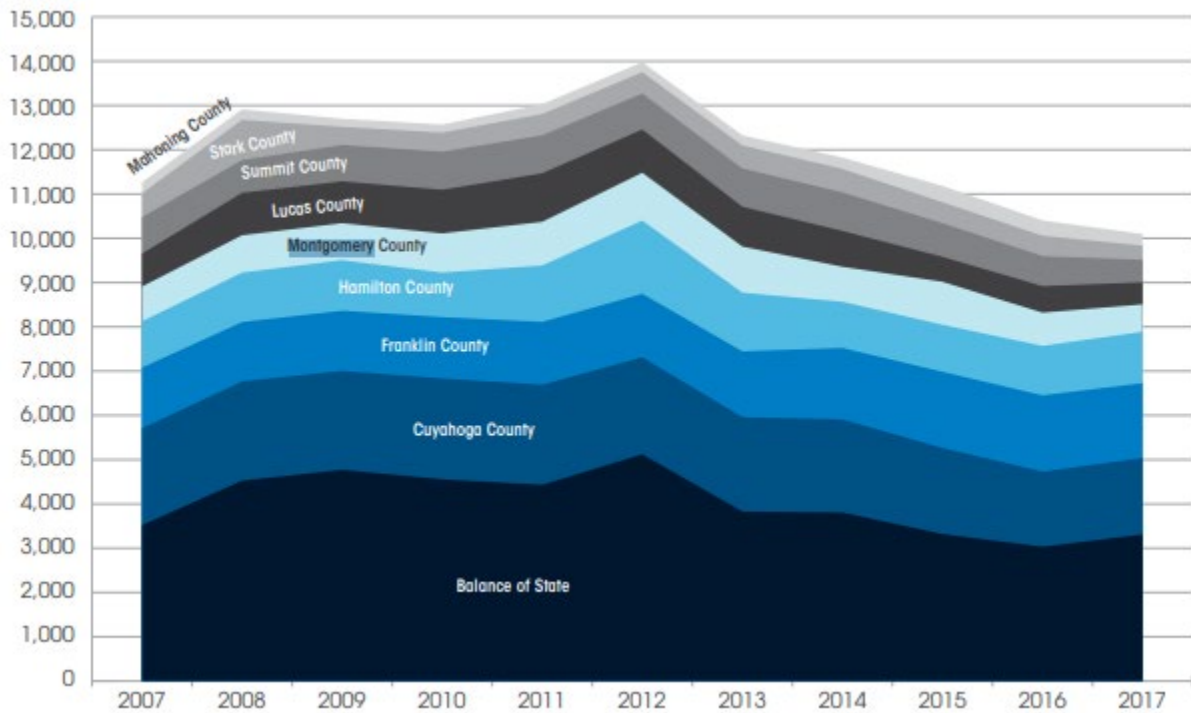


Figure 6: Point-in-Time Count of Homeless Population by Continuum of Care.

Vulnerable Populations

Numerous measures in [Ohio's FY 2021 Housing Needs Assessment](#) (data reflecting pre-tornado conditions) indicate that Montgomery County residents' housing need and vulnerability exceeded the state average in many categories. Table 1 highlights some of these findings.

Table 1: Ohio Housing Needs Assessment Highlights

	Montgomery County	Ohio	Notes
Affordable and available units per 100 extremely-low income (ELI) renters	32	44	Shortage of 17,790 units in Montgomery County
Affordable and available units per 100 very-low income (VLI) renters	73	80	Shortage of 11,360 units in Montgomery County
Renter households with severe rent burden	24.3%	23%	21,250 renter households who are severely cost-burdened

	Montgomery County	Ohio	Notes
Projected share of population 55 years of age and older by 2030	33.1%	32%	164,430 residents
Single mother renters	16.5%	14.8%	14,449 residents
Adults with a disability	18.1%	16.8%	73,483 adults
Opiate overdose mortality rate (per 100,000 residents)	51.4	26.5	1,368 overdose deaths involving opiates (2014 - 2018)
Infant mortality rate (per 1,000 live births)	7.53	7.30	510 infant deaths (2009 – 2018)
Eviction filing rate	6.7%	6.5%	5,850 eviction filings (2018)

Infant Mortality Hot Spot

Ohio's children face poverty and health challenges related to their housing environment. If the mother lives in low-quality and has inconsistent housing, it can contribute to infant mortality (OHFA, 2019). Ohio is eighth in the country for a high infant mortality rate. Furthermore, there is a stark racial gap in infant mortality. Montgomery County's infant mortality rate was 6.8 deaths for every 1,000 births overall in 2018, though the rate was 10.5 deaths per 1,000 births for black infants. In 2016, for every 1,000 children born, 7.4 died before their first birthday with black infants experiencing 15.2 deaths per 1,000 live births.

Education and Employment

In Montgomery County only 36.9% of residents ages of 25 and older received an associate degree or higher, 63.1% have no degree, and 10.1% do not have a high school diploma. Montgomery County does not have four-year public universities or regional campuses. The county has one two-year public college, one technical center, and two private universities.

The Dayton region tends to lag behind national trends, so the unemployment rate is higher, closer to 4.5%. But that's a sharp decrease from five years ago when the unemployment rate in the Dayton Metropolitan Statistical Area (MSA), defined as Montgomery, Greene and Miami Counties, was at 5.87%. Prior to COVID-19, the Dayton Research Advisory Council was confident unemployment in the area would remain low. Steady but slow job growth was predicted for Dayton with 2,200 jobs to be added by the end of 2020. According to the ManpowerGroup Employment Outlook Survey, 26% of employers in the Dayton MSA plan to hire more employees in the first quarter of 2020. ManpowerGroup also reports a majority of businesses surveyed, 67%, will maintain current staff levels. (Research Advisory Council, 2020).

Dayton is Ohio Aerospace Hub and has the largest single-site employer in Ohio, Wright-Patterson Air Force Base. With 30,000 employees, Wright-Patt is the largest employer in Dayton. Healthcare remains the second fastest growing industry for the Dayton Metropolitan Statistical Area (MSA) just behind government jobs at Wright-Patterson Air Force Base. 29 hospitals and health organizations in the greater Dayton region have an \$8.1 billion economic impact and employ nearly 35,000 people – well above the national average. Manufacturing, transportation/warehousing and logistics remain strong industries within the region but the RAC notes employment is still below pre-recession levels. (Research Advisory Council, 2020)

According to a report conducted by the U.S. Conference of Mayors (of which Dayton Mayor Nan Whaley is a member) at the peak of the 2007 recession, the Dayton region lost more than 34,000 jobs and the

report predicts it will be 2024 before all of those jobs return. The auto industry remained a little soft in 2019 but the RAC predicts it will stabilize in the second quarter of 2020. From 2014 to 2019, manufacturing jobs grew by more than 4,000 in the Dayton MSA. Transportation and warehousing grew by 6% within the same time period. The RAC said the overall softening is a national trend but those industries are more volatile here in Dayton, partially because wages lag slightly behind the national average. According to the most recent wage estimates by the U.S. Bureau of Labor Statistics, median hourly earnings for all production occupations in the nation are at \$16.86. In the Dayton MSA, those same occupations earn a median hourly wage of \$16.54. (Research Advisory Council, 2020)

The county's civilian labor force is more than 250,700. Of that total 239,400 are employed.

Economic Conditions

For more than a decade, the Dayton region has struggled to remain economically viable. It was hit hardest when automotive-related manufacturing sites closed during the 2007 recession. Several of the region's largest employers also left Ohio. More than a decade later the job market is growing, despite the labor shortage, but the job growth and unemployment rate are higher than the national average. The supply chain and healthcare economies are growing industries; however, the county needs to implement workforce development initiatives to support them.

The economy overall experienced budget cuts from intergovernmental revenues but currently has no deficits. Revenues increase by 5.1%, property values increased by 4.6%, and sales tax increased from .25% to 1.25%, the first increase in 30 years. Dayton's MSA specifically experienced a major decrease in jobs within the nonagricultural sectors, but an increase in the health, trade, transportation, and utility, and federal sectors.

Plans and Needs

The county plans to diversify its economic base and leverage its technology, research, and development sectors at the Wright Patterson AFB. The county is also actively working to implement a long-term financial plan encompassing planning processes and allocation methodology, capital issues, financial projections, and general economic trends. Montgomery County wants to improve overall services for families and children. Therefore, the plan will include managing the Human Service Levy Funds. The county also wants to address changes and needs for food security, environmental development, and disability services and regulations. To achieve these goals the county prioritized these initiatives in its financial plan and has prepared to manage finances accordingly for efficient investment in community and economic development. (Keith, 2018)

Post-Disaster Conditions

Memorial Day, May 27, 2019, through the early morning hours of May 28, 2019 was a historic 24-hour period in Ohio. Starting at sunset on May 27, 20 separate tornadoes hit the Dayton area, the most ever recorded in a 24-hour period in Ohio. Four tornadoes registered as EF3 or higher: one was an EF4 and three were rated EF3. This was the largest tornado event in Ohio history.

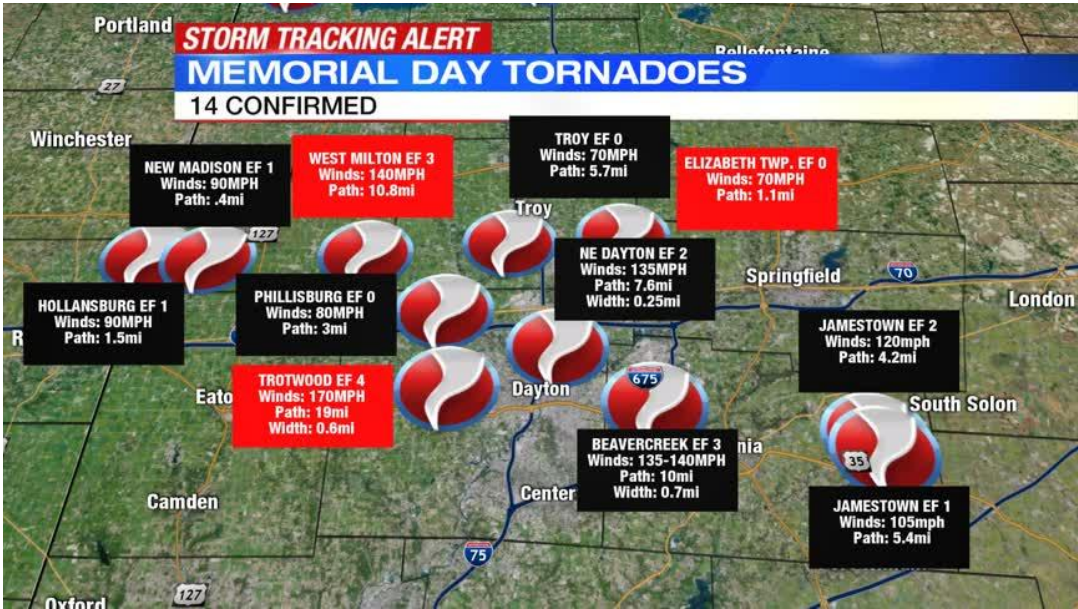


Figure 7: Shows an early report from Dayton local new ABC9

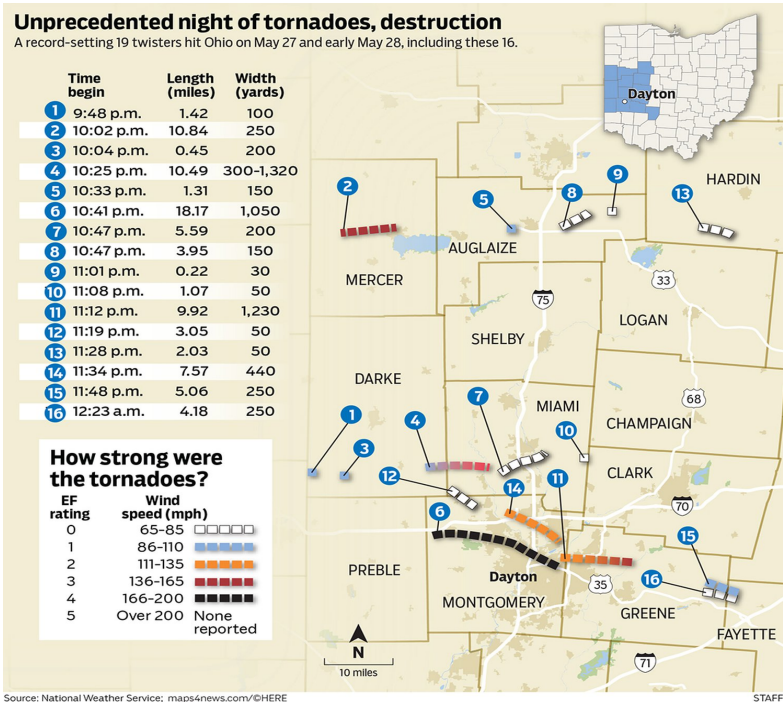


Figure 8: Ohio Tornado Map with Time, Distance and Wind Speeds

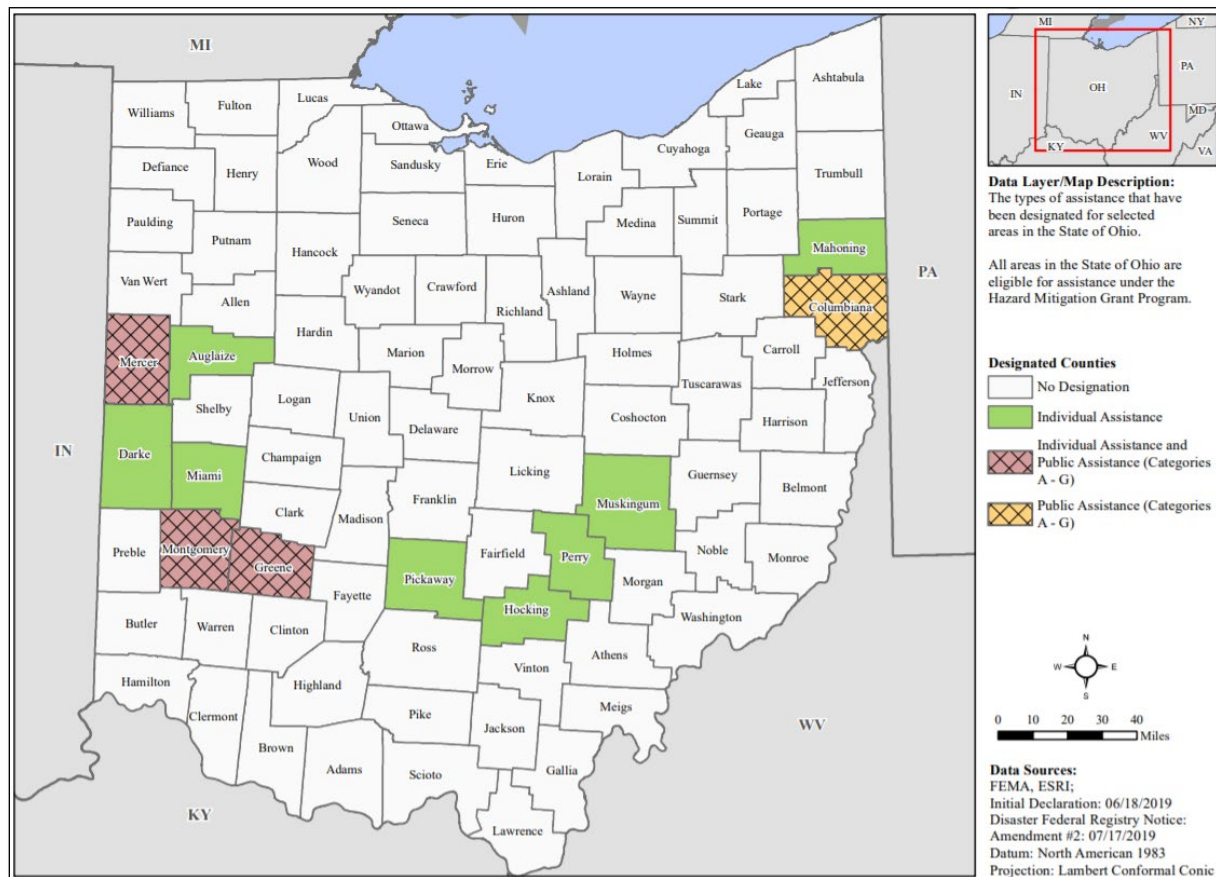


Figure 9: Ohio –Severe Storms, Straight-line Winds, Tornadoes, Flooding, and Landslides FEMA-4447-DR Declared on June 18, 2019, President Trump declared that a major disaster exists in the State of Ohio. This declaration made Individual Assistance available

Business and Economic Impact

The disaster disproportionately impacted already economically distressed areas. Based on current American Community Survey (ACS) data Dayton, Harrison Township and Trotwood each have a poverty rate greater than 20%. Harrison Township's and Trotwood's unemployment rates have averaged more than 9% over the past three years.

Employment and Labor Statistics

The business sector was significantly impacted by the tornadoes. Information from the county's community and economic development department indicated that 12 business sustained more than \$9.2 million in damage, production loss and lost wages. As a result, 266 workers were displaced. One company paid hotel costs for 25 of its employees whose homes were damaged. All of the company's employees, 50 total, were displaced because of lost production.

Businesses in Old North Dayton employ more than 10,000 people. Two businesses, Dayton-Phoenix Group and Lion Apparel, are currently closed due to damage from the tornadoes. The Dayton-Phoenix Group, based in Dayton, was founded in 1939 and employed 250 people. They design and manufacture electrical and locomotive components for industrial and railroad markets worldwide. They also design

and manufacture 3- and 4-cylinder motor-driven pistons compressor motors and NEMA-type motors for screw-compressor applications.

Lion Apparel manufactures turn-out gear for first responders and employs 40 people. They held the grand opening for a new production facility (\$1.7 million) on May 22, 2019. The tornado destroyed their building. The damage also included one production line being destroyed, resulting in an inventory loss and product manufacturing being halted. The estimated economic impact on the business is \$3.5 million. The company met sales needs by shifting work to another facility, but the company constructed the new facility to accommodate increased sales.

The impact on Harrison Township's, Trotwood's, and Vandalia's economies was significant. However, the county has been diligent in its efforts to be resilient and return stability to the region. Business First! For a Greater Dayton Region visited 418 businesses to examine the storms' impact and gather information on what companies needed to continue operating. The group organized Disaster Recovery Business Walks in Trotwood, Harrison Township, and Vandalia to assist companies with finding resources and aid and obtain estimates for repairs and revitalization.

According to the Disaster Recovery Walk Summary Data, Business First targeted 585 commercial properties and contacted 418. As a result of the tornadoes, 26% of businesses remained open, 71% closed temporarily, and 3% are still closed. Regarding damage, 20% experienced minimal damage such lost shingles, 24% minor damage, and 11% major damage. The main type of businesses affected were services, retail, manufacturing, and restaurants and 220 people lost employment. The total estimated financial impact, a total of \$8.6 million, encompassed structural and foundation, inventory and product, equipment and asset, sales, revenue and other costs.

Disaster Recovery Walk Summary Data

	Vandalia 6/17	Trotwood 6/26	Harrison - N. Main 7/17	Harrison Dixie 7/26	Email Campaign	Total
Commercial Properties Targeted	102	142	156	185	n/a	585
# of Volunteers	24	39	22	29	n/a	114
Business Touched	59	103	67	147	42	418

Did your business close as a result of tornado?

	Vandalia 6/17	Trotwood 6/26	Harrison - N. Main 7/17	Harrison Dixie 7/26	Email Campaign	Total
Not Closed	37%	17%	27%	23%	36%	26%
Closed Temporarily	63%	79%	71%	75%	59%	71%
Still Closed	0%	4%	2%	2%	5%	3%
No Damage	57%	44%	45%	44%	37%	45%
Affected	12%	14%	12%	24%	39%	20%
Minor Damage	20%	30%	33%	24%	7%	24%
Major Damage	12%	13%	10%	8%	17%	11%

Type of Business

	Vandalia 6/17	Trotwood 6/26	Harrison - N. Main 7/17	Harrison Dixie 7/26	Email Campaign	Total
Health	3%	7%	20%	3%	3%	6%
Info Tech	3%	0%	0%	0%	5%	1%
Logistics	9%	0%	0%	1%	5%	2%
Manufacturing	12%	1%	5%	9%	50%	11%
Restaurant	6%	15%	11%	3%	3%	8%
Retail	11%	36%	20%	26%	11%	23%
Service	36%	36%	34%	55%	18%	40%
Wholesale	6%	0%	0%	3%	3%	2%
Other	14%	6%	10%	0%	3%	6%

Number of Employees

	Vandalia 6/17	Trotwood 6/26	Harrison - N. Main 7/17	Harrison Dixie 7/26	Email Campaign	Total
Before TORNADOS	1,576	689	637	843	2,732	6,477
After TORNADOS	1,528	626	536	889	2,678	6,257

Estimated Financial Impact

	Vandalia 6/17	Trotwood 6/26	Harrison - N. Main 7/17	Harrison Dixie 7/26	Email Campaign	Total
Structure/Foundation	\$38,000	\$720,000	\$120,000	\$170,500	4,010,250	\$5,058,750
Inventory/Product	\$41,250	\$25,075	\$101,200	\$8,200	36,120	\$211,845
Equipment/office/assets	\$12,500	\$1,000,000	\$0	\$0	190,000	\$1,202,500
Sales/revenue	\$538,500	\$217,600	\$269,500	\$63,000	465,000	\$1,553,600
Other	\$1,000	\$0	\$16,000	\$0	24,439	\$41,439
Total	\$607,250	\$5,620,000	\$508,500	\$477,000	\$1,453,559	\$8,666,309

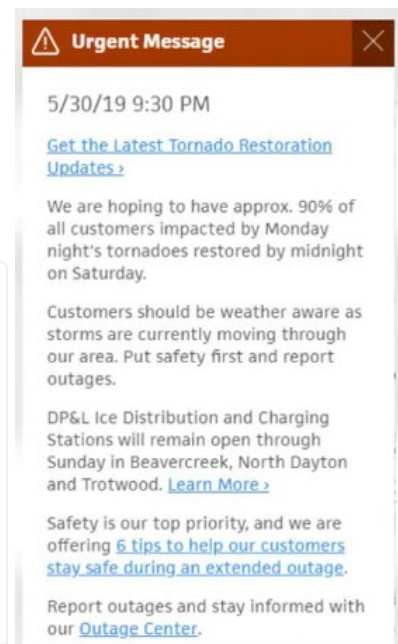
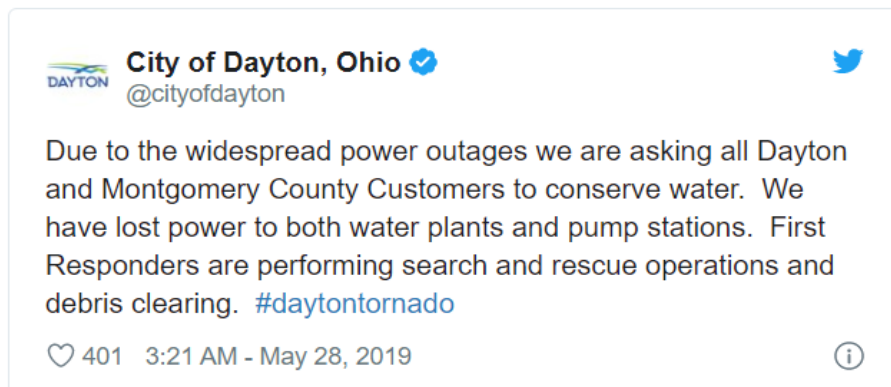


Figure 10: Urgent Message: Update on Restoration of power.

Figure 11: Twitter Screenshot: City of Dayton requesting customers to conserve water due to widespread power outage.

Infrastructure Impact

The tornadoes impacted Montgomery County's infrastructure, causing even more distress to communities. About 5 million citizens did not have electricity for days. By June 7, 2019, 11 days after the storm, crews had restored power to all the areas significantly impacted. The tornadoes downed power lines and hit 85 traffic lights in Dayton.

The storms impacted Dayton's water system, resulting in a partial depressurization or boil advisory for nearly 410,000 customers in the greater Dayton area. Of those customers, approximately 250,000 receive water through a county-operated system. The city lost power to its water treatment plant's generators and residents were without potable water for four days until the water system was re-pressurized on May 30, 2019. The final boil advisory lifted on May 31, 2019. In December 2019, Dayton applied for \$4.7 million from the U.S. Economic Development Administration recovery grant for new generators to mitigate effects of large power outages.

The county lost power to both wastewater treatment plants and pump stations and advised residents to conserve water in preparation for generator shutdown. After the two pump stations lost power, county sewer workers had to divert 4.7 million gallons of wastewater directly into the Stillwater River.

A retention area of a water control facility located in Harrison Township sustained damage to approximately 1,053 linear feet of security fence. Additionally, the tornadoes damaged two pumps designed to push chamber water out of the wellfield. These wellfields are Dayton's fresh water source, and the retention area discharges contaminants away from this fresh water source. Estimated damages for the water control facilities were \$127,000.

In addition to power outages, the tornadoes uprooted trees, damaged sidewalks, and damaged railings and fences. Fortunately, there was a positive volunteer turnout. Across the region people gathered to assist in removing debris and cleaning up. (Wilson, Baker, Kronenberger, Frolik, & Blizzard, 2019) There were also numerous water donations and participation in community watch for criminal activity.

Montgomery County road damages are likely underrepresented. The impacted roads are not built to sustain continued traffic to restore power and remove debris. Therefore, these costs will likely increase during the long-term recovery effort.

Prior to the tornadoes, Dayton had a high demand for demolishing blighted structures. The city utilized various funding sources to demolish hundreds of units in the several years prior to the tornadoes, including federal Community Development Block Grant (CDBG), Neighborhood Stabilization Program (NSP), state Moving Ohio Forward and local funding. However, the tornadoes added a significant number of additional properties to the demolition list. The city partnered with the Montgomery County Land Bank to address some of these properties. The Ohio Housing Finance Agency utilized \$18.6 million in federal Hardest Hit Funds in Montgomery County to help eliminate blighted properties that depress nearby property values. These funds allowed the Montgomery County Land Bank to demolish 1,088 housing units, 80% of which were located in Dayton. Demolition remains a priority in the area, especially after the tornadoes.

While there was a significant number of demolitions before the storm, most, if not were of uninhabitable, condemned and/or vacant properties. Nevertheless, demolition reduces the number of overall housing units in the county. Many of the units destroyed by the tornadoes were naturally-occurring affordable

housing, adversely impacting low-income populations. With many units destroyed by the tornadoes and requiring emergency demolition, the county needs to create new affordable units.

Impacted jurisdictions completed spot demolitions of destroyed and unsafe properties where property owners did not have the means to demolish their properties, using mostly Federal Emergency Management Agency (FEMA) and local CDBG funds. These demolitions did not further impede vulnerable populations by assessing the property with a lien.

Environmental Impact

The Ohio Emergency Management Agency's (EMA) Assessment Public Assistance Impacts Joint Preliminary Damage Assessment (Joint PDA) estimated debris removal for Montgomery County at more than \$6 million.

In Harrison Township, the tornadoes created an estimated \$765,000 in damage at Sinclair Park. The Park Club Housing, two picnic shelters, a storage building, a restroom, playground equipment, the park entrance signage and message board, and a cast concrete split rail fence sustained damage. In addition, more than 380 trees were destroyed and/or damaged. This accounts for approximately 90% of the park's trees. This park was a focal point for tourism and community outings and celebrations in the greater Dayton area. Revenue loss from facility rentals makes the township's recovery more challenging.

The City of Dayton moved more than 115,000 cubic yards of debris to two major debris staging sites where it was chipped and hauled away. All debris blocking city public rights of way was removed by October 2019, five months after the event.



Figure 12: City of Dayton debris staging area.

The destructive nature of tornadoes can cause environmental damage. Damaged buildings that expose gas lines can cause fires, releasing carbon dioxide into the atmosphere. Damage also kills animals and disrupts the food chain. Trees alone take about 100 years to grow to maturity and as numerous trees were destroyed by tornadoes, it impacts the neighborhood's vitality, releases less oxygen into the environment, and decimates animal habitats. Farms hit by tornadoes create food shortages and profit

loss. Lastly, land and water contamination effects human, animal, and plant health. (Achenbach & Samenow, 2019)



An aerial photo of Sinclair Park in Harrison Township, Montgomery County





Tree Damage Pictures from 2019 Memorial Day Tornadoes



Dayton Memorial Park- North Dixie Drive cemetery sustained damages. More than 170 gravestones were toppled

Housing Impact

Tornado Damage Assessments

In the Federal Emergency Management Agency's (FEMA) Joint Preliminary Damage Assessment (Joint PDA), 974 properties were reported as damaged by the tornado event. However, the Affected Properties Damage Assessment, completed by the Montgomery County Auditor, reports 5,663 properties in Montgomery County were damaged as a result of the tornadoes. This increase in the number of damaged properties is 581% higher than the initial assessment.

The county auditor's assessment addressed properties not units. Therefore, the total number of damaged units is expected to be higher. The Auditor divided the analyzed properties into the taxable property types: apartments, mobile homes and trailers, and single-family dwellings. The calculations indicate that 2,633 apartments, 101 mobile homes or trailers, and 2,929 single family homes were affected by the storms. The table below also analyzes the assessment by jurisdiction.

Table 2: Affected Properties Damage Assessment by Jurisdiction (June 2019)

Jurisdiction	Affected	Destroyed	Inaccessible	Major	Minor	Total
Brookville						
Apartment	1	0	0	0	0	1
Mobile Home/Trailer	1	0	0	0	0	1
Single Family Dwelling	149	33	1	56	91	330
Totals	151	33	1	56	91	332
Butler Township						
Apartment	1	0	0	4	6	11
Single Family Dwelling	45	8	0	10	77	140
Totals	46	8	0	14	83	151
Clayton						
Apartment	26	0	0	1	0	27
Single Family Dwelling	105	12	1	16	51	185
Totals	131	12	1	17	51	212
Dayton						
Apartment	86	71	3	139	199	498
Single Family Dwelling	242	23	1	75	145	486

Jurisdiction	Affected	Destroyed	Inaccessible	Major	Minor	Total
Totals	328	94	4	214	344	984
Harrison Township						
Apartment	9	292	0	138	285	724
Mobile Home/Trailer	70	12	0	6	12	100
Single Family Dwelling	298	44	1	150	268	761
Totals	377	348	1	294	565	1585
Riverside						
Apartment	197	2	0	34	34	267
Single Family Dwelling	214	1	0	20	53	288
Totals	411	3	0	54	87	555
Trotwood						
Apartment	120	629	0	251	105	1105
Single Family Dwelling	223	50	1	159	298	731
Totals	343	679	1	410	403	1836
Vandalia						
Single Family Dwelling	4	0	0	1	3	8
Totals	4	0	0	1	3	8
Grand Total	1791	1177	8	1060	1627	5663

Table 3: Affected Properties Damage Assessment by Housing Type (June 2019)

Housing Type	Affected	Destroyed	Inaccessible	Major	Minor	Total
Apartment	440	994	3	567	629	2633
Mobile Home/Trailer	71	12	0	6	12	101
Single Family Dwelling	1280	171	5	487	986	2929
Grand Total	1791	1177	8	1060	1627	5663

For the purpose of the county auditor's survey, the county defined the categories as follows:

- Affected: shingle or roof damage.
- Minor Damage: minor damage to the property which could include shingle and/or roof and includes additional damages.
- Major Damage: major damage to the property, but not destroyed.
- Destroyed: the property, or a structure on the property, is destroyed.
- Inaccessible: units where the county could not access the property.

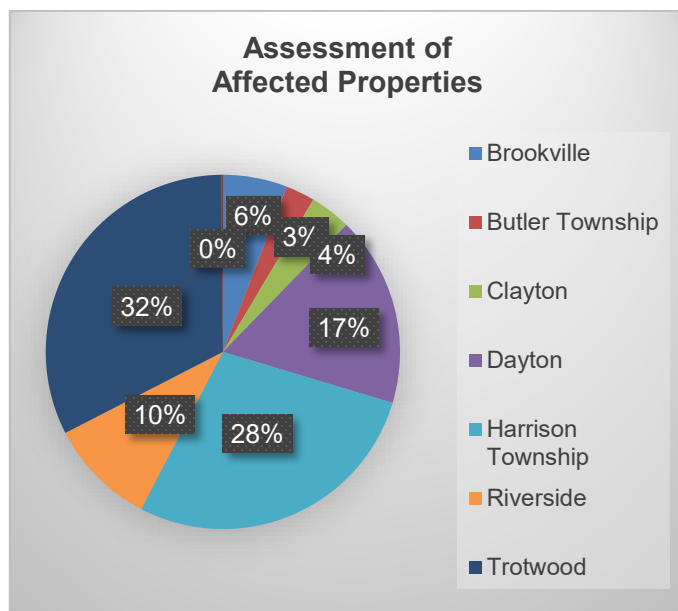


Figure 21: Assessment of Affected Properties

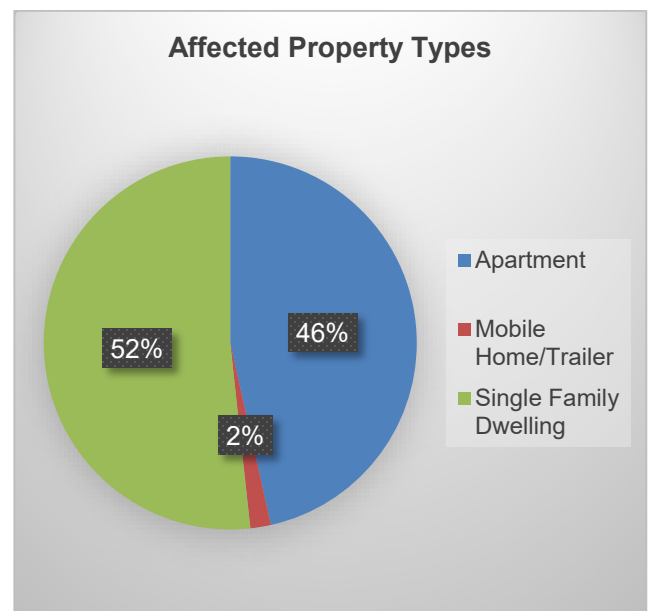
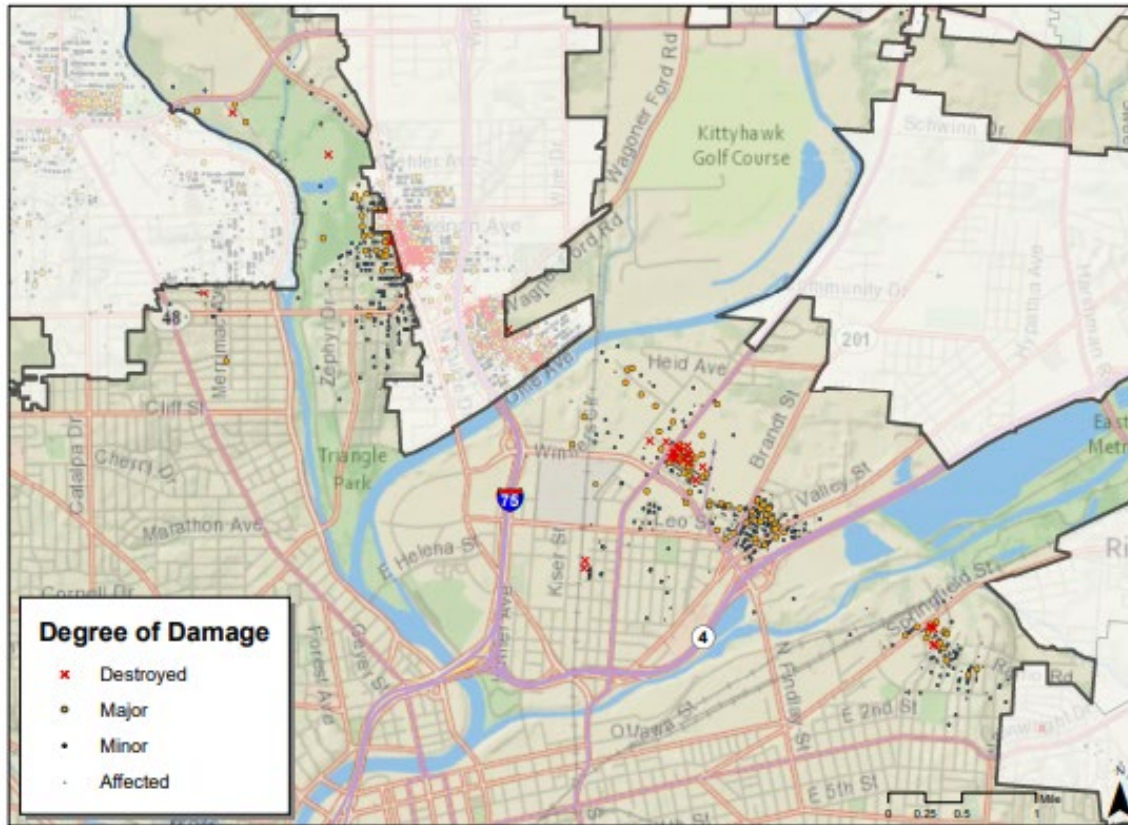


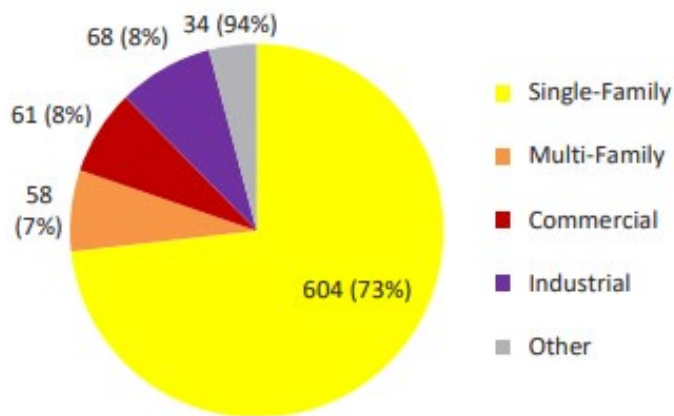
Figure 22: Affected Property Types

According to the most recent census bureau statistics, of Trotwood's 24,435 population, 51.3% are homeowners. Trotwood's ZIP code was flagged as the only MID ZIP code for the Ohio Community Development Block Grant Disaster Recovery (CDBG-DR) award. Roughly half of the population resides in rental housing units. Damage assessment from the Trotwood area reveal the rental population was hardest hit by the tornadoes. With a median household income of just \$32,977 and a poverty rate of 25.6%, this population is most likely to experience housing instability as a result of the tornadoes.

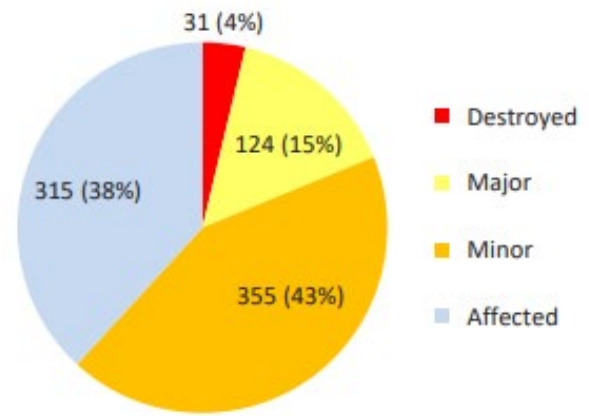
Dayton Tornado Damage Assessment



Affected Land Uses



Types of Damage



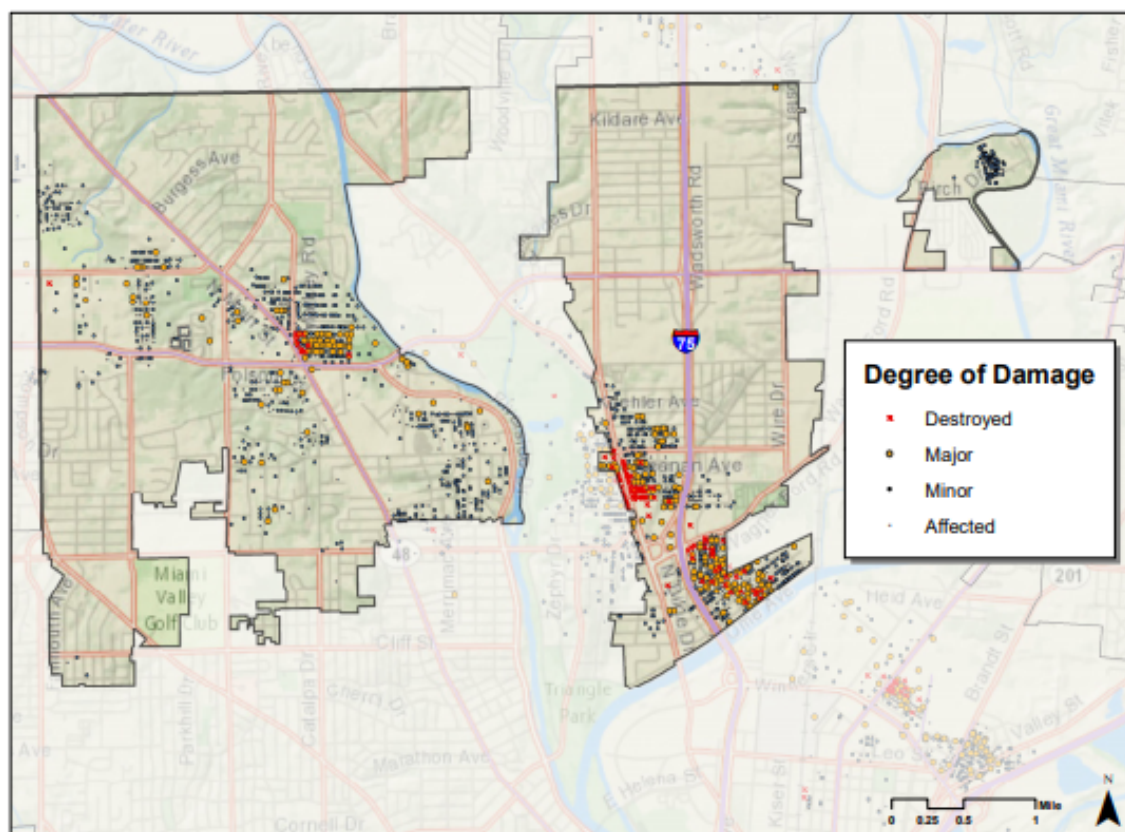
	Destroyed	Major	Minor	Affected
Single Family	12 (38.7%)	82 (66.1%)	266 (74.9%)	244 (77.5%)
Multi Family	5 (16.1%)	13 (10.5%)	13 (3.7%)	27 (8.6%)
Commercial	3 (9.7%)	9 (7.3%)	35 (9.9%)	14 (4.4%)
Industrial	9 (29.0%)	18 (14.5%)	20 (5.6%)	21 (6.7%)
Other	2 (6.5%)	2 (1.6%)	21 (5.9%)	9 (2.9%)
Total	31 (100.0%)	124 (100.0%)	355 (100.0%)	315 (100.0%)

Date Produced: 11/12/2019
Montgomery County Auditor
Produced by MVRPC

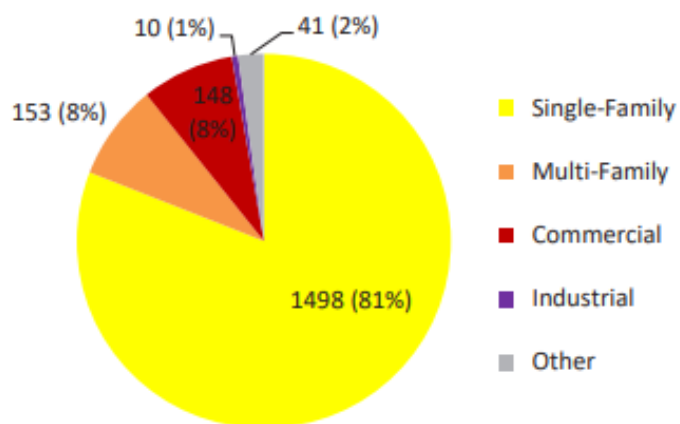


Figure 23: Dayton Tornado Damage Assessment Map with Damage Detail

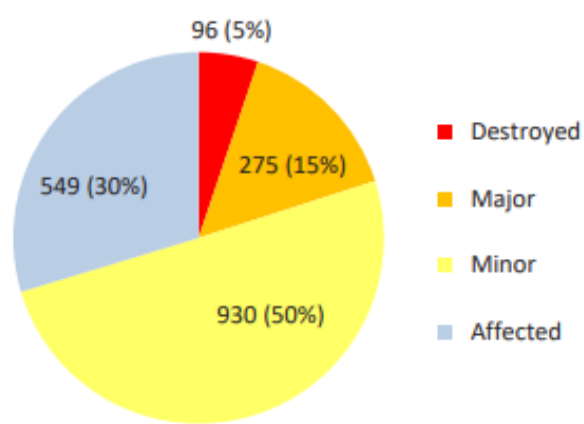
Harrison Township Tornado Damage Assessment



Affected Land Uses



Types of Damage



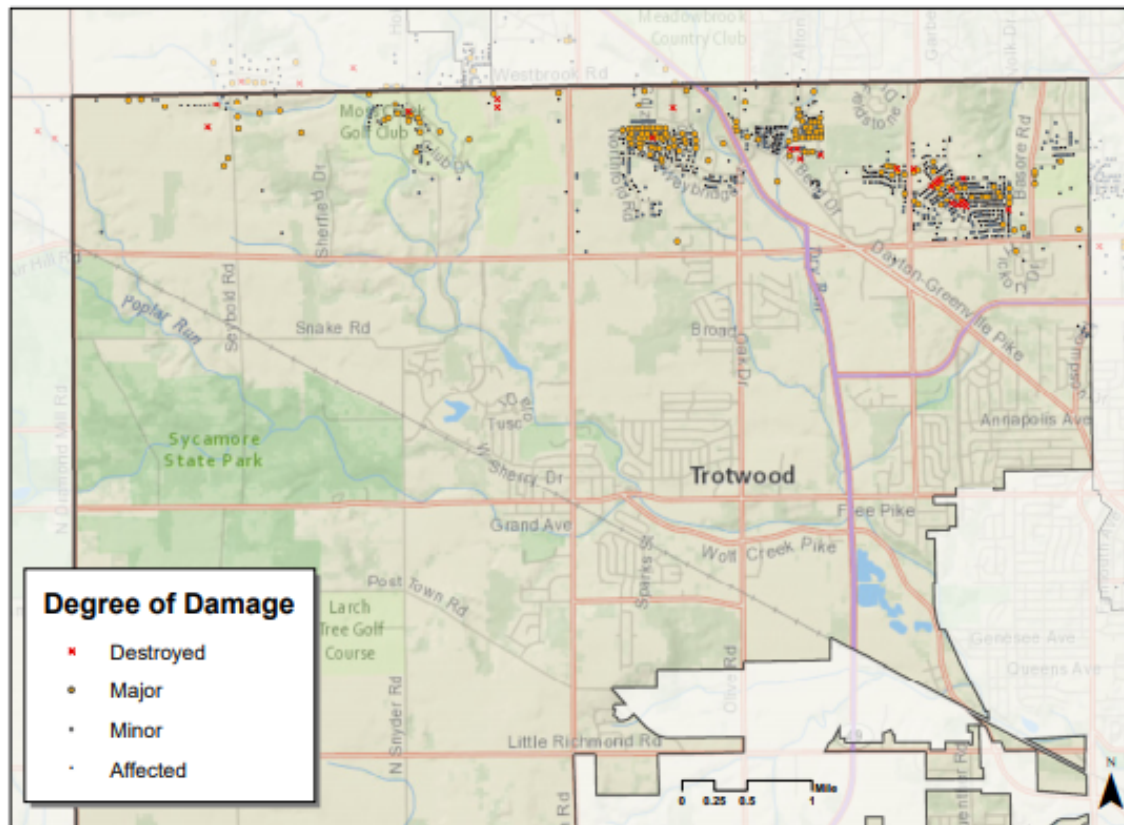
	Destroyed	Major	Minor	Affected
Single Family	51 (53.1%)	228 (82.9%)	844 (90.8%)	375 (68.3%)
Multi Family	2 (2.1%)	14 (5.1%)	14 (1.5%)	123 (22.4%)
Commercial	36 (37.5%)	28 (10.2%)	48 (5.2%)	36 (6.6%)
Industrial	0 (0.0%)	3 (1.1%)	3 (0.3%)	4 (0.7%)
Other	7 (7.3%)	2 (0.7%)	21 (2.3%)	11 (2.0%)
Total	96 (100.0%)	275 (100.0%)	930 (100.0%)	549 (100.0%)

Date Produced: 11/12/2019
Montgomery County Auditor
Produced by MVRPC

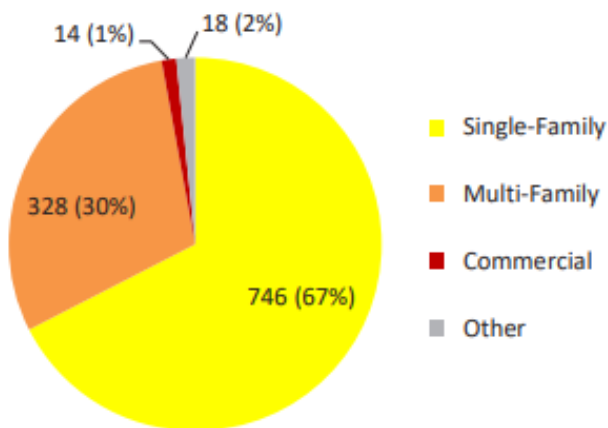


Figure 24: Harrison Township Tornado Damage Assessment

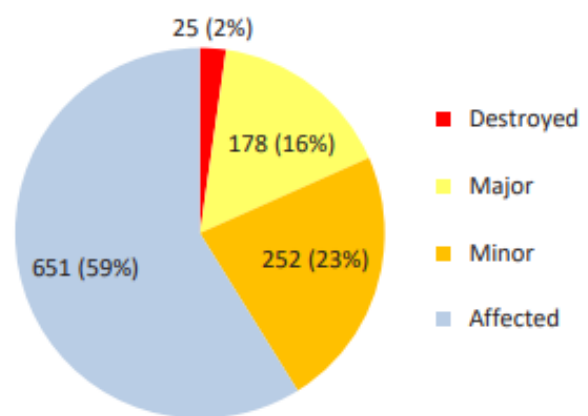
Trotwood Tornado Damage Assessment



Affected Land Uses



Types of Damage



	Destroyed	Major	Minor	Affected
Single Family	22 (88.0%)	148 (83.1%)	202 (80.2%)	374 (57.5%)
Multi Family	2 (8.0%)	18 (8.1%)	45 (17.9%)	263 (40.4%)
Commercial	0 (0.0%)	5 (2.5%)	2 (0.8%)	7 (1.1%)
Industrial	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Other	1 (4.0%)	7 (3.9%)	3 (1.2%)	7 (1.1%)
Total	25 (100.0%)	178 (100.0%)	252 (100.0%)	651 (100.0%)

Date Produced: 11/12/2019
Montgomery County Auditor
Produced by MVRPC



Figure 25: Trotwood Tornado Damage Assessment

Housing Impact for Vulnerable Populations

Individuals with access and functional needs limitations will require assistance with accessing and/or receiving disaster resources. These individuals can range from children to older adults, physically disabled to having limited English proficiency. It is imperative that the county is aware of these affected populations as their level of resiliency may be impeded even more. Specialized resources may include, but are not limited to social services, accommodations, information, transportation, or medications to maintain health. Regardless of the nature of the need, recovery efforts must ensure that all individuals are able to access disaster recovery resources.

The state has limited data regarding how the tornadoes impacted specific subsets of the population, including vulnerable populations

Homeless/Transitional Housing

Montgomery County has emergency shelters and rapid re-housing assistance available, funded by the Ohio Development Services Agency's Office of Community Development. During peak times in the days following the tornadoes, the American Red Cross operated five temporary shelters assisting a total of 126 people. Montgomery County has four permanent emergency shelters that operate as a part of the community's homeless crisis response system. The shelters are the St. Vincent de Paul Shelter for Women and Families, Gettysburg Gateway for Men, Daybreak Youth Shelter and the YWCA Dayton Domestic Violence Shelter.

The tornadoes caused minor damage to one of the St. Vincent de Paul's Safe Haven properties, which provides housing and case management for the severely mentally ill and is leased from the YWCA. A large tree fell on the house knocking down the chimney, causing a hole in the roof and several broken rafters. It also caused damage to the gutters and downspouts and demolished several sections of the privacy fence. Even though the house had to be vacated to complete repairs, all clients continued to receive normal service during the repairs. In addition, the St. Vincent de Paul Queen of Martyrs Conference Center, which provides services such as utilities and rent assistance, clothing and food to low-income families temporarily suspended providing direct services. As of this report, all the damage to the Safe Haven house has been repaired and direct services through the Conference restored.

The typical path to access Rapid Re-Housing (RRH) is for the individual or family residing in an emergency shelter. Montgomery County had adequate shelter beds available with the flexibility to absorb large increases in shelter demand. However, the shelters never experienced a substantial increase in demand. Following the tornadoes, the region lead added a question to the Homeless Management Information System (HMIS) to capture if people were displaced by the tornadoes. As of March 2020, 52 households entering emergency shelters indicated they were seeking shelter as a result of the tornadoes. Those households are comprised of 46 single adults and six families (five with children and one couple without children).

While the number of households entering the emergency shelter system has been modest in comparison to the number of impacted households in the county, the homeless system has been impacted in other ways. The tornadoes damaged more than 1,000 apartment units and destroyed or majorly damaged an additional 1,500 more. According to data from Montgomery County Auditor, 2,633 affordable and subsidized housing units were damaged or destroyed, adding more strain on an already challenged affordable housing market. The average length of time households experience homelessness at the system level before and after the tornadoes increased by four days. In addition to losing housing units,

the homeless system has also experienced a significant increase in rental costs as a result of the demand for housing from those displaced by the tornadoes. It has become a supplier's market and demand for housing following the tornadoes has allowed landlords to add additional fees and charges to maximize profit.

Approximately 179 individuals receiving services through the Montgomery County Board of Developmental Disabilities Services (MCBDDS) were also impacted by the incident. One of the hardest hit areas, Trotwood, saw more than 1,800 residential units damaged and more than 600 destroyed. Several supportive living settings were destroyed or damaged as the area is home to a significant number of individuals receiving MCBDDS services. Immediately after the incident, the MCBDDS and the Miami Valley In-Ovations (MVIO) staff worked to provide temporary housing for individuals displaced by the storms and coordinated an array of services to promote continuity of care. MVIO was not able to allow residents to return to the properties and requested they move forward with securing long-term alternative housing operations for the individuals impacted by the incident. MVIO does intend to repair the properties, but the timeframe is unknown. Approximately 60 individuals resided in properties that sustained some type of damage related to the storm.

Echoing Woods Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID) relocated 31 individuals which required them to share space with 30 individuals at a sister facility. The MCBDDS is working with the Ohio Department of Developmental Disabilities and Montgomery County Alcohol, Drug Addiction and Mental Health Services to facilitate renting space on the grounds of the former Montgomery Developmental Center (MDC) to house displaced individuals.

Residents displaced as a result of the tornado addressed their housing needs in a variety of ways. They moved in with friends and family, hotels and homeless shelters, and some lived out of their cars. Also, some families had to separate and couch surf between households or choose to remain in their damaged homes. Citizens are aware that recovery efforts could take time. Therefore, nonprofits and churches have assisted with rebuilding efforts, housing, feeding and clothing residents, and providing necessities. FEMA also played a role in providing housing resource fairs and hosting housing recovery events. In addition to searching for temporary shelter, residents had difficulty finding permanent housing. Properties that were once habitable were either too expensive or unclean. Applying for multiple housing units is cost-prohibitive for most households in the area.

There are no unmet needs for these facilities as it relates to the disaster. The current emphasis for this population is on COVID-19-related needs. Currently, Coronavirus Aid, Relief, and Economic Security Act (CARES) Act and stimulus funding is addressing these needs. Development is currently providing \$4,210,800 in funding to Dayton/Montgomery County for homeless and supportive housing services for individuals and families (including sub-populations) that are homeless and at risk of homelessness. This includes in \$605,800 in Emergency Solutions Grants – CARES Act (ESG-CV) funding to assist those impacted by the COVID-19 pandemic. These activities include providing motel vouchers to help homeless shelters meet increased demand while maintaining social distancing, personal protective equipment (PPE), and rental assistance for individuals and households who are homeless or at risk of homelessness. Development also plans to make ESG-CV funding available to help emergency shelter providers renovate facilities to address COVID-19-related long-term permanent solutions

Currently Development is providing \$848,700 in funding to Montgomery County to provide homelessness prevention and rapid rehousing services. In addition, Development is supporting homeless organizations to operate 382 shelter beds and 67 transitional housing units for homeless males, females, youth, and households with children. Development funding is also supporting homeless organizations to operate

384 units of permanent supportive housing for homeless persons with a disability, including mental health and substance abuse.



Limited English Proficiency (LEP)



Figure 26: Dayton Immigration Population

According to U.S. Census data and demonstrated in Figures 29, 30, 31 and 32, approximately 6% of the population in the county speaks a language other than English at home and 2.4% do not understand English well. Service providers will take careful consideration of the language needs of these populations during the applicant intake process. The U.S. Census estimated 499,313 citizens age 5 and older in Montgomery County, nearly 12,000 residents in the impacted county, do not speak English well. The national origin for new citizens in Dayton in the past five years have been Russia, India, Turkey, the Philippines, and Mexico, and the most predominate non-English languages in the area are Turkish and Spanish.

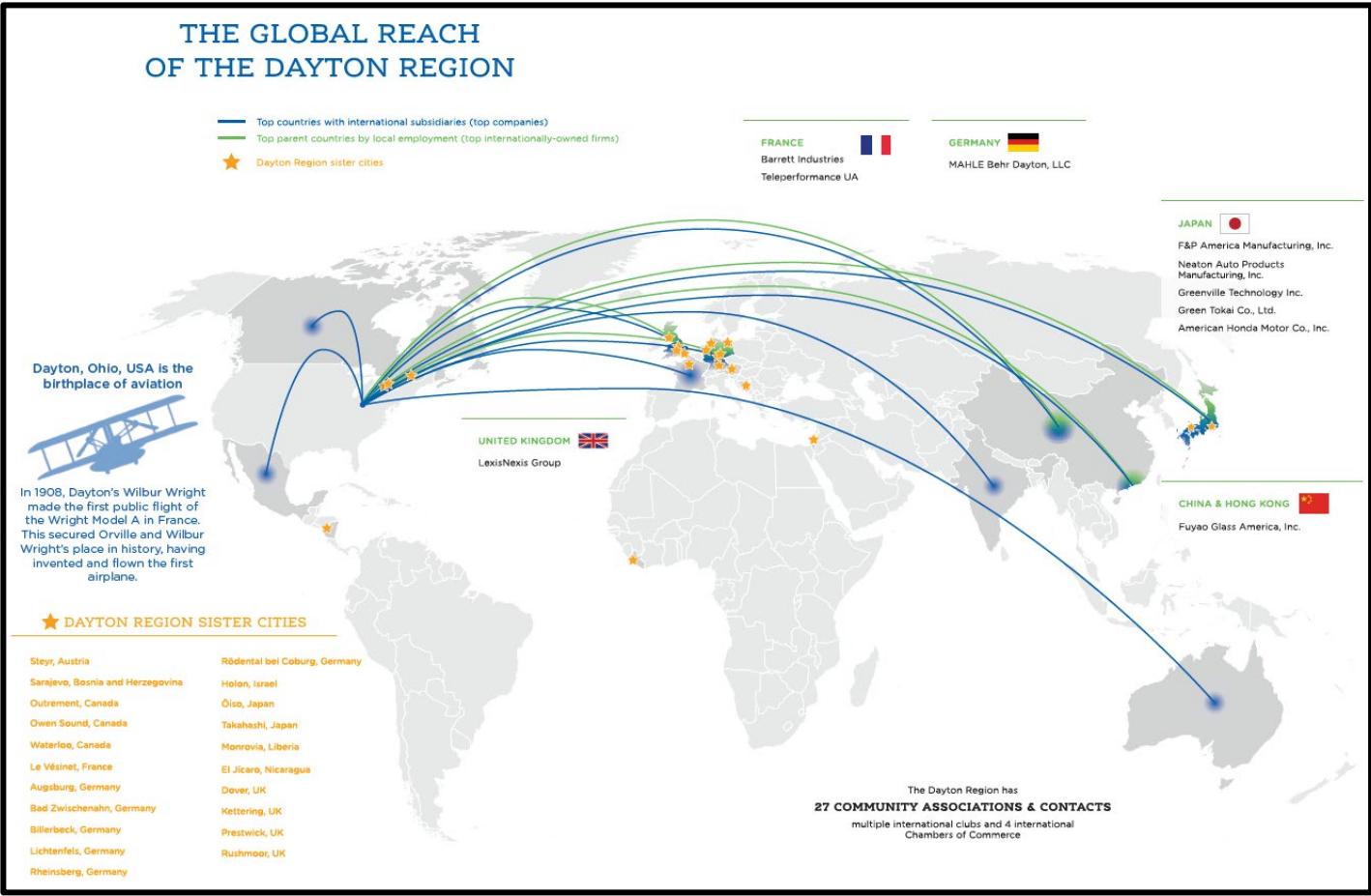


Figure 27: The Global Reach of the Dayton Region

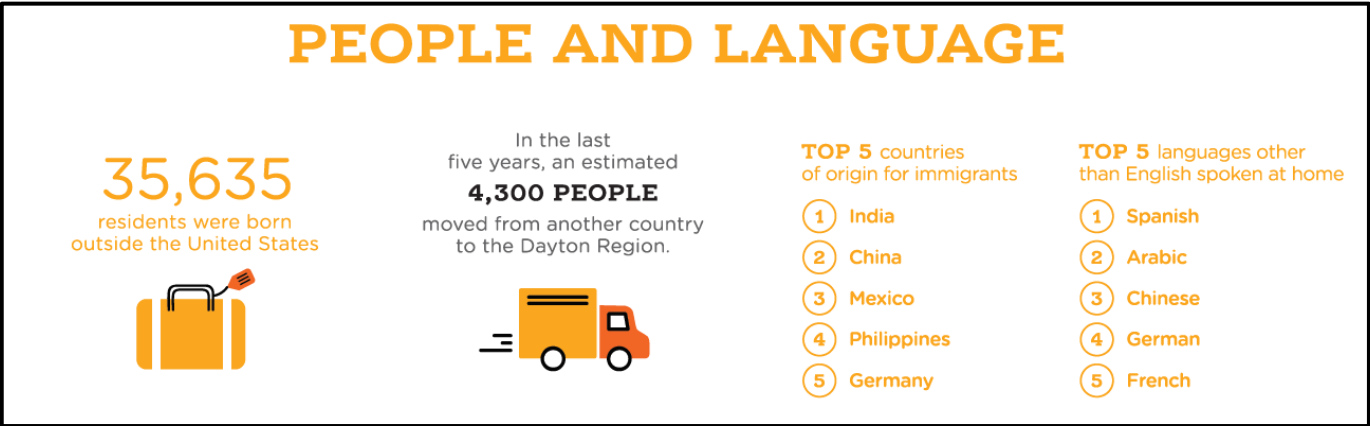


Figure 28: People and Language

According to figure 29, the Old North Dayton, Wright View and Riverside areas have the highest concentration of people with limited English proficiency in the tornado path.

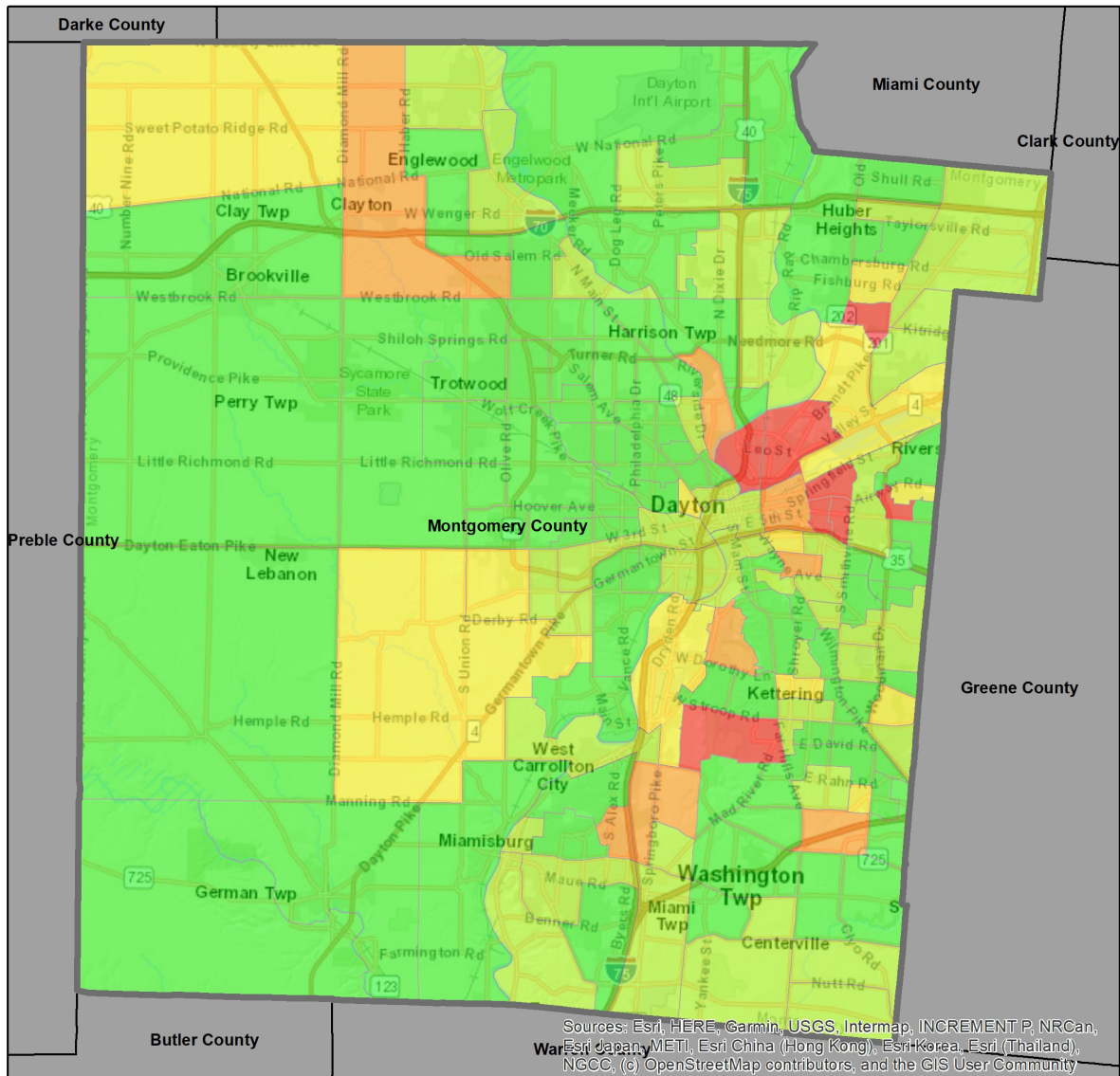
Percentage of Persons with Limited English Proficiency



Development Services Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor

Lydia L. Mihalik, Director



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

0 0.5 1 2 3 4 Miles

Persons (age 5+) who speak English "less than well"

- 0% - 0.5%
- 0.6% - 1.5%
- 1.6% - 2.8%
- 2.9% - 4.6%
- 4.7% - 7.7%

Data source: Centers for Disease Control and Prevention/
Agency for Toxic Substances and Disease Registry
Social Vulnerability Index 2018 Database Ohio
<https://svi.cdc.gov/data-and-tools-download.html>

Date: 2/24/2021

Figure 29: Persons with Limited English Proficiency

Special Needs Populations

Figure 30 illustrates that the majority of persons with disabilities in Montgomery County reside in Dayton, close to available services. A high percentage of residents also live in Brookville, Clay Township and Huber Heights. Persons suffering from disabilities have a hard time surviving, let alone recovering from disasters. In the aftermath of disaster, these people are often unable to seek additional assistance due to the barriers to accessing services. For this reason, these populations are considered vulnerable with higher risks and greater needs. Following the tornadoes, 12% of households seeking assistance from the MVLTROG were households with a disabled household member. As of March 2021, 18% (29) of 160 open cases are households with a disability.

Ethnicity

Figure 31 shows Montgomery County citizens' ethnicity by census tract. The tornado path aligns with some census tracts with the highest populations of Hispanic or Latinx residents. 51% of those seeking assistance through the MVLTROG disaster recovery declined to share ethnicity. As a result, only 2% of those seeking assistance are reported to be Hispanic or Latinx. As of March 2021, two households with open cases are of Hispanic or Latinx origin and 78% of open cases declined to share ethnicity.

Households with Families and Children

Figures 32, 33 and 34 show the census tracts in Montgomery County with higher percentages of families and households with children under the age of 18. The census tracts incorporating and surrounding downtown Dayton have the lowest percentages of families and households with children. Most of the county's census tracts have higher percentages of families and households with children. 27% of those seeking assistance following the tornadoes were households with children under the age of 18. As of March 2021, 15% of open cases are households with children.

Percent Hispanic or Latino of any Race



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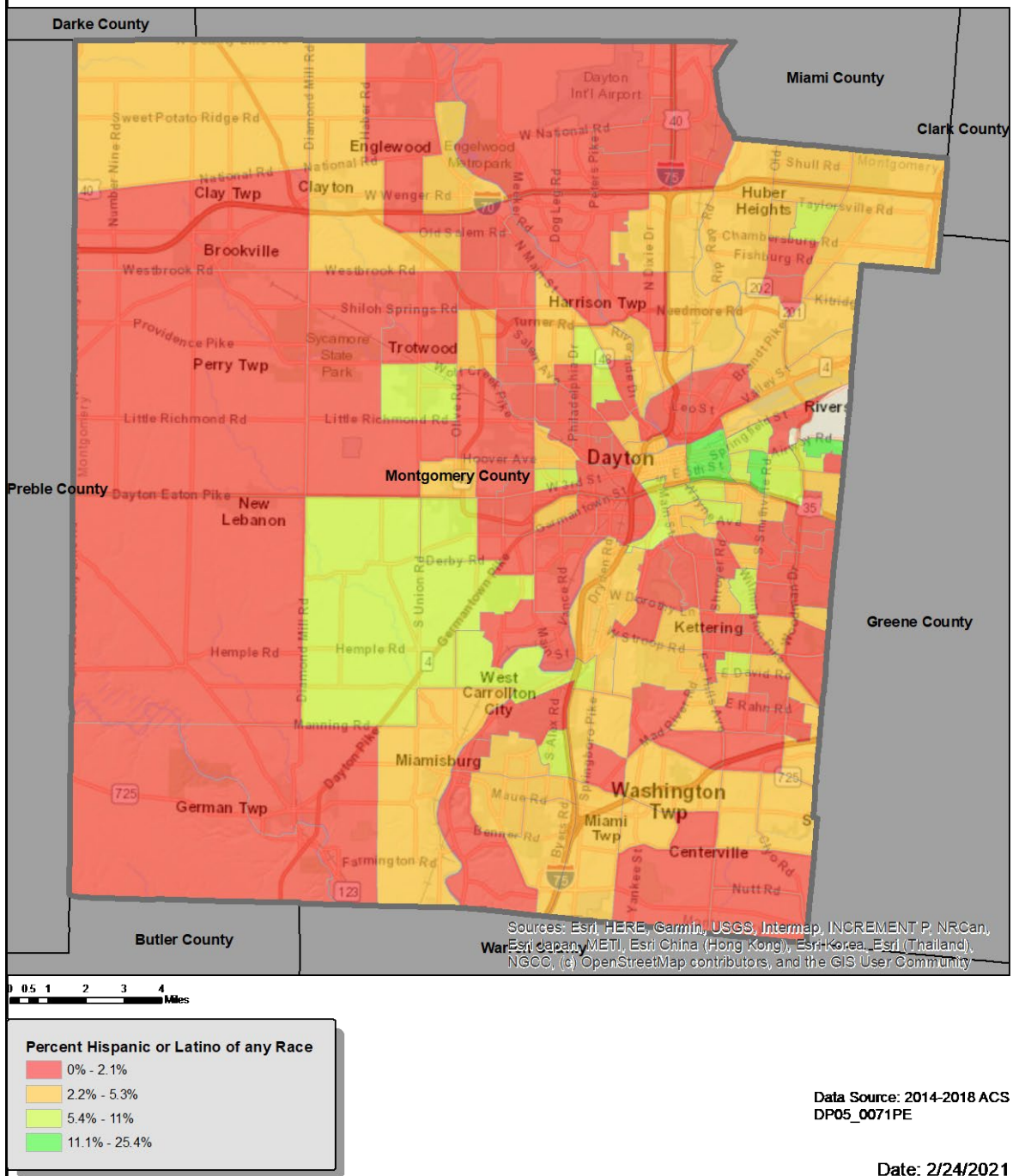


Figure 31: Persons of Hispanic or Latino Ethnicity

Percentage of Families by Census Tract



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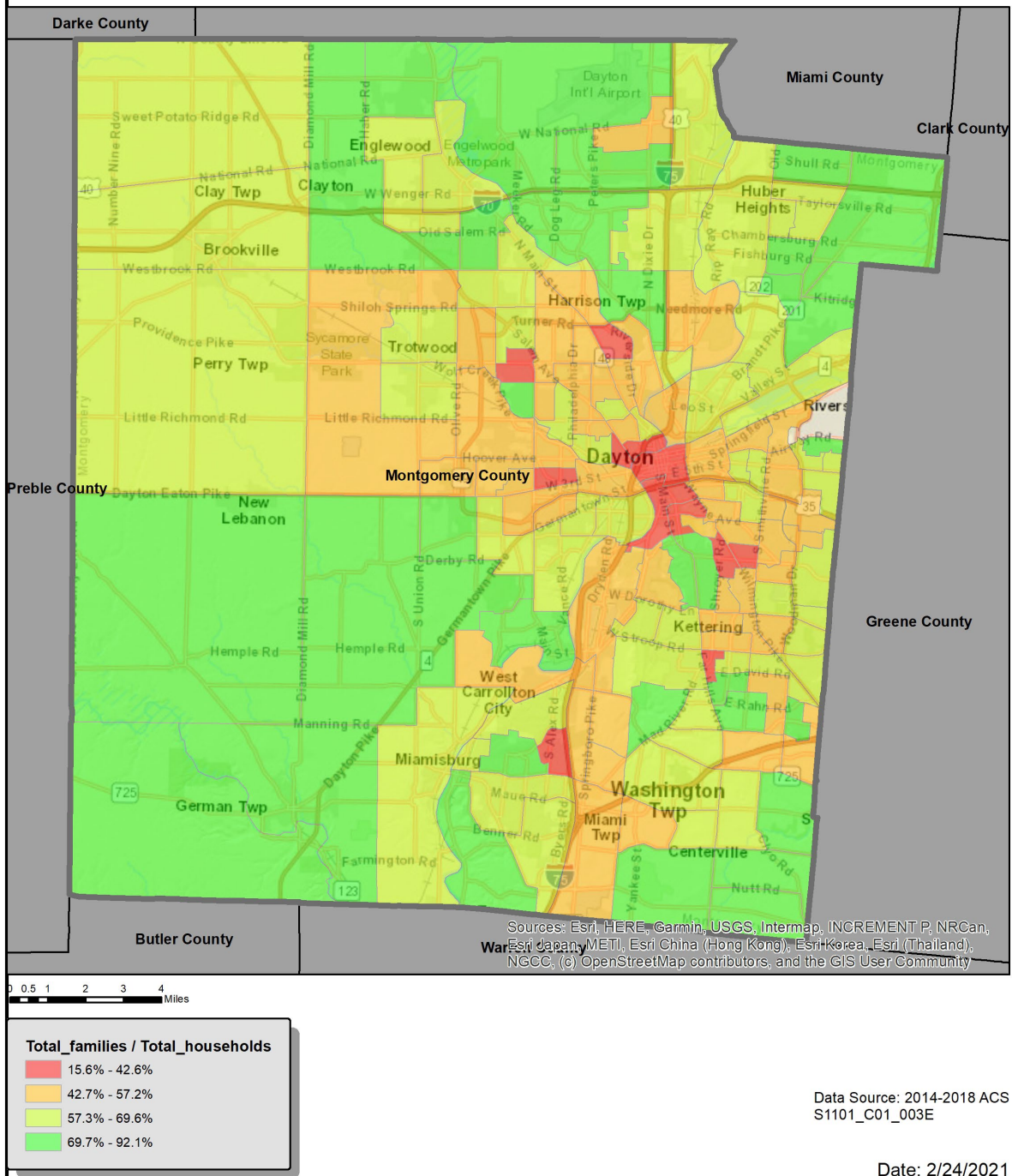


Figure 32: Percentage of households with families

Total Number of Families



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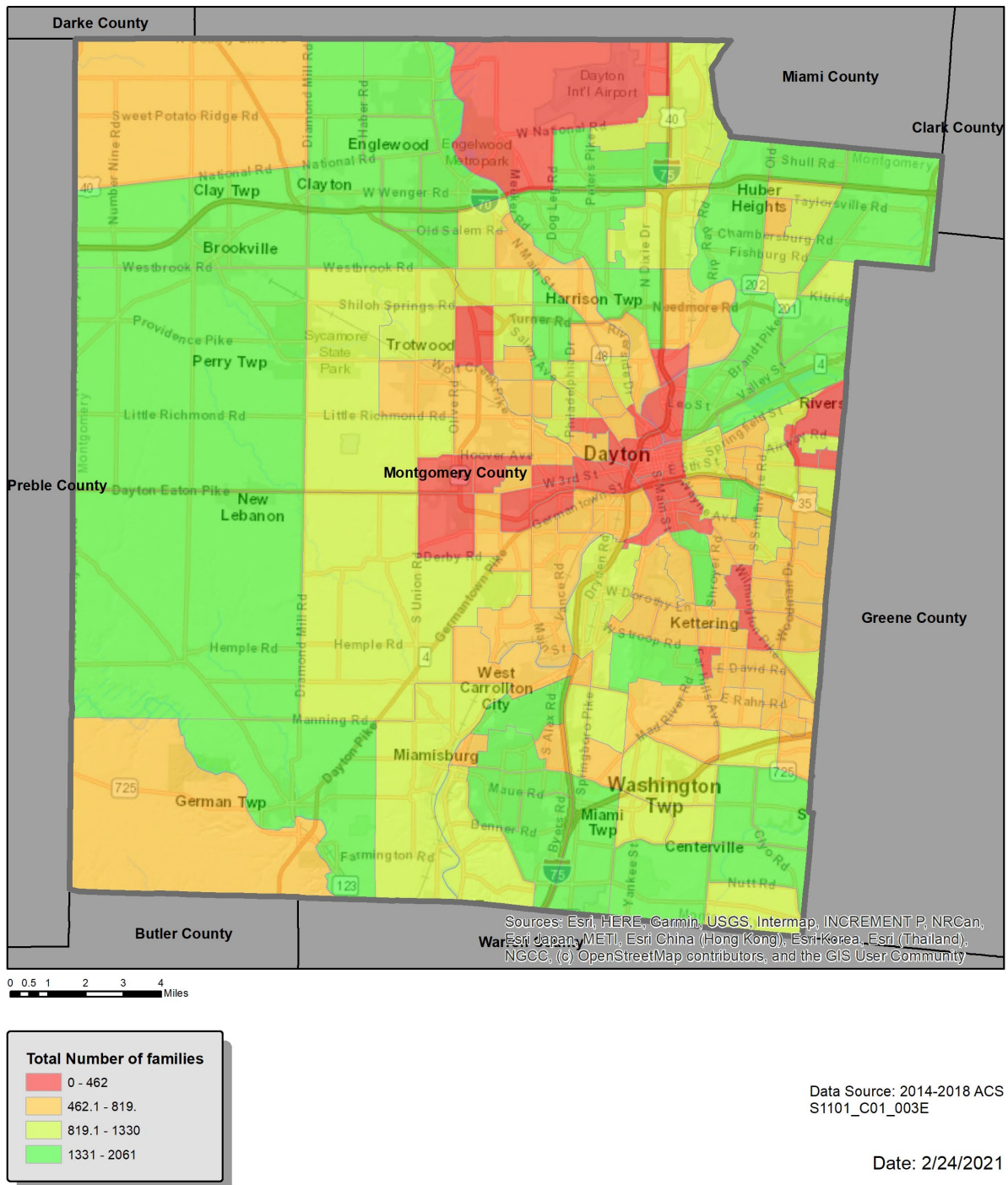


Figure 33: Total number of families by census tract

Households with Own Children of the Householder Under 18 Years



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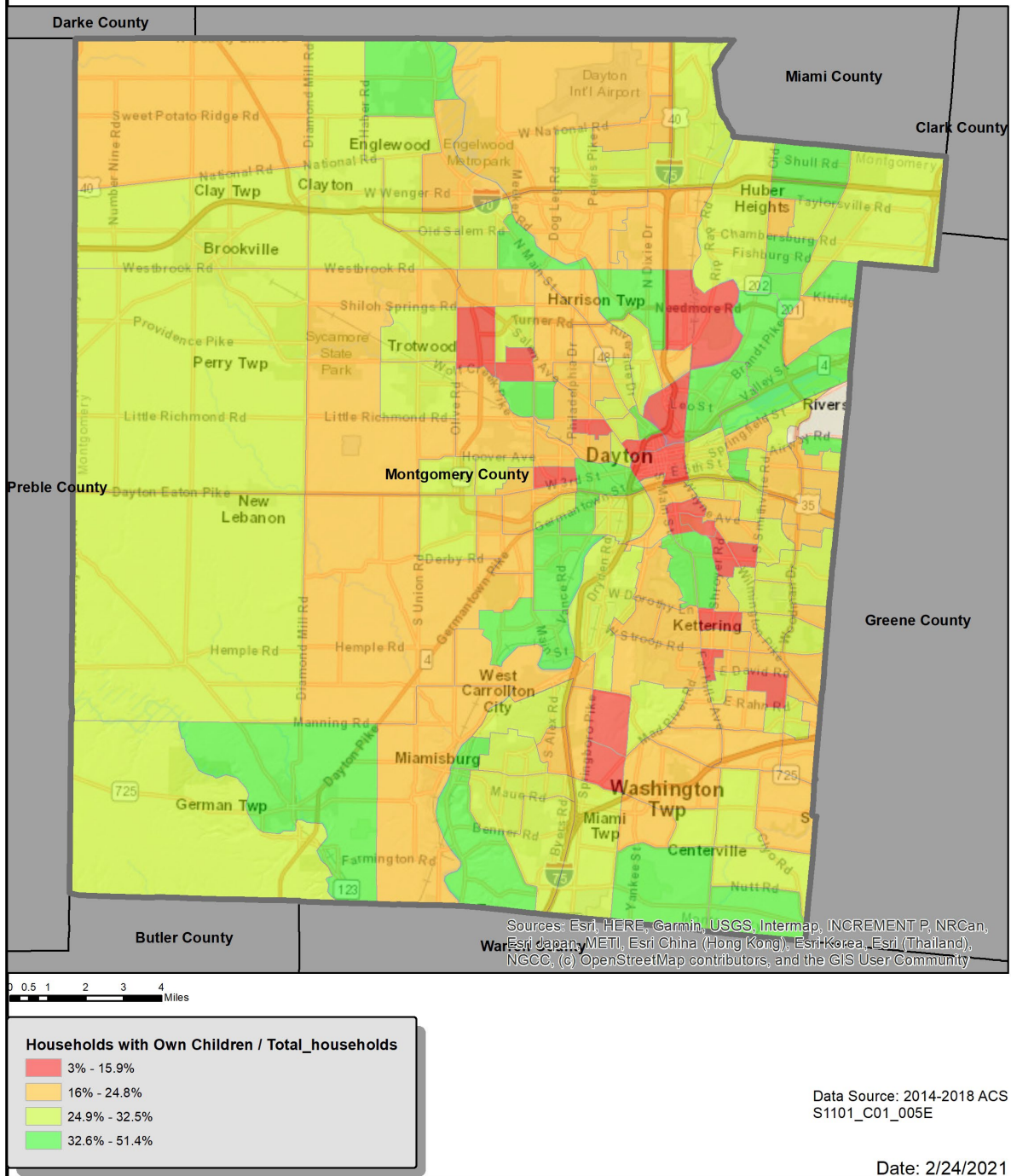


Figure 34: Households with Children under 18

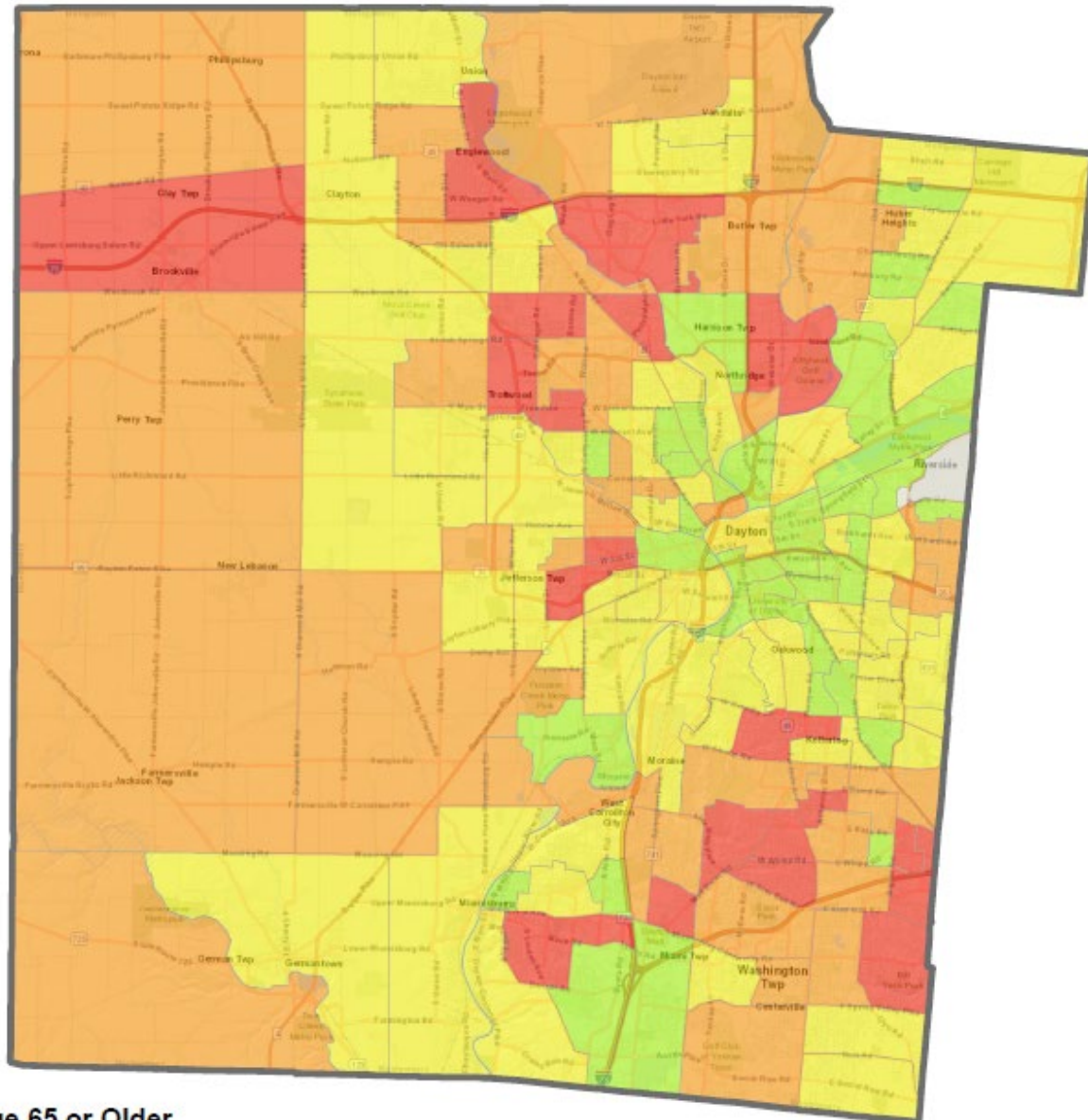
Percentage of persons aged 65 or older



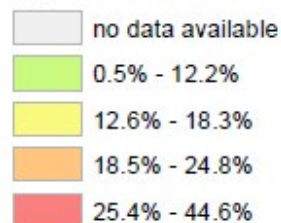
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Age 65 or Older



Data source: Centers for Disease Control and Prevention/
Agency for Toxic Substances and Disease Registry
Social Vulnerability Index 2018 Database Ohio
<https://svi.cdc.gov/data-and-tools-download.html>

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Figure 35: Montgomery County Percentage of persons aged 65 or older

2011-2015 ACS Low and Moderate Income Census Tracts



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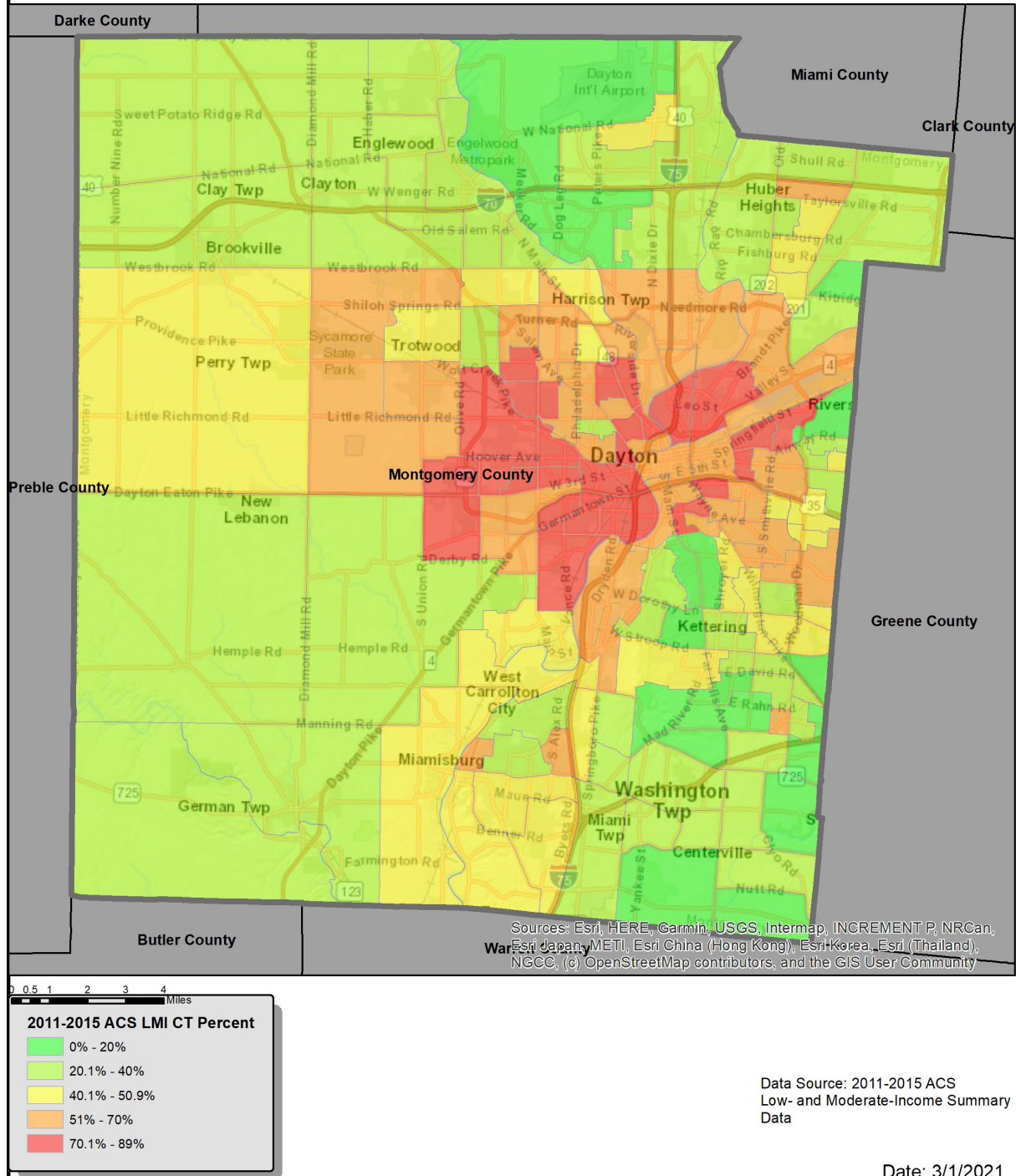


Figure 36: Montgomery County Census Tracts Low and Moderate Income

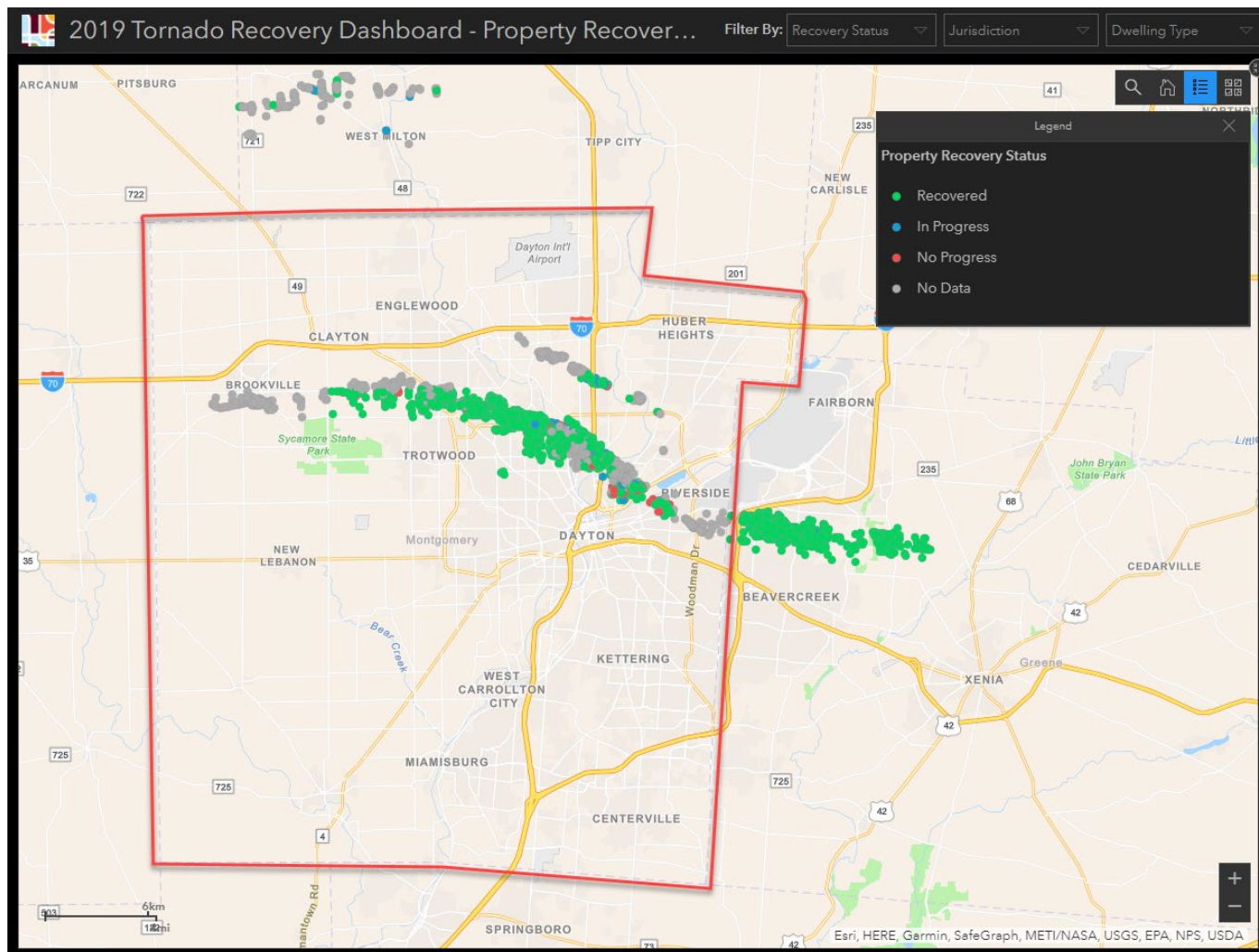


Figure 37: MVLTRG Mapping of Impacted Properties and Recovery Status

When comparing Figure 37 with Figures 29-36, it appears the tornadoes impacted vulnerable populations.

Elderly

Age contributes to a household's potential vulnerability. Emergency relief and even basic services are often hard to access for older residents. Some citizens older than 65 are likely not to have access to personal vehicles, creating a barrier to obtaining services. Also, according to 2018 ACS data for Montgomery County, the median retirement income is \$26,875. This limited income makes it difficult to recover from disasters. Figure 35 highlights where adults aged 65 or older comprise more than 25% of the population, many living in the most-impacted communities. Seniors made up 29% of the households seeking assistance following the tornadoes. As of March 2021, 44% of open cases are senior households.

LMI Populations

Figure 36 shows where the low-to-moderate (LMI) population is most concentrated. LMI residents live in Dayton's inner city, and extend as far as Trotwood, Harrison Township, and the outskirts of Kettering along I-75 and I-35. Unfortunately, the tornado damage occurred mostly within these zones. Because

residents in these areas are already LMI, it will be difficult to reverse Montgomery County's economic trend. According to 2018 ACS data, 36.2% of Montgomery County's population is at or below 199% of the poverty level.

Many of the affected areas have a high percentage of uninsured low-income families. These survivors may not have the means to rebuild and/or relocate without additional support. There are also neighborhoods that do not welcome federal and/or state support and are therefore not receiving any needed assistance. Following the tornadoes, 37% of households seeking assistance were at or below the federal poverty level for Montgomery County. As of March 2021, only 12% of open cases are households at or below the poverty level.

Public Housing Authority

Greater Dayton Premier Management (GDPM), the local public housing authority, did not experience major damage to its public housing units, other than power loss. Currently, the GDPM has two properties, with a combined total of approximately 85 units with outstanding damage from the tornadoes. The tornadoes mostly caused external damages to structures, particularly siding and porch posts. Initially, GDPM planned to address the storm damage during rehabilitation to eliminate disruption to clients currently residing in the properties. The units that sustained damages were covered by insurance, however, GDPM will need additional capital funds to complete the rehabilitation for both properties. Due to timing, GDPM proceeded with tornado damage repairs using insurance funds. GDPM is currently working with a developer on a competitive Housing Development Assistance Program application through OHFA for the additional capital funds needed for the rehabilitation.

Vulnerable Populations Needs Post Disaster

These numbers highlight the critical need to leverage the limited CDBG-DR funds with Low Income Housing Tax Credits (LIHTC) to construct as many affordable units as possible. The tornadoes created a severe need for housing and a greater need for related supportive services. Additionally, all developments utilizing LIHTC through OHFA are required to provide service coordination to residents as well as connections to information and resources appropriate to the population being housed. Developers must submit a supportive services plan at project completion for all developments utilizing CDBG-DR funds. Requirements for supportive service plans are outlined on pages 23-24 of the [2021 Qualified Allocation Plan](#).

Furthermore, a small portion of the CDBG-DR funds will be targeted to single-family homeownership. This activity will allow vulnerable populations impacted by the tornadoes the opportunity to become homeowners after working through case management and supportive social services to become homeownership ready.

The units created as a result of these funds will be marketed to residents impacted by the tornadoes, including the vulnerable populations identified above. OHFA and Development will work closely with developer partners, and local, state, and regional organizations that are most connected to these populations to ensure they have the opportunity to obtain safe, healthy, affordable, and accessible housing.

Furthermore, the Dayton/Kettering/Montgomery County Continuum of Care (CoC), OH-505, can support the promotion of housing for vulnerable populations as outlined in its FY 2019 CoC application at <https://www.mcoho.org/OH-505%20CoC%202019%20Consolidated%20Application.pdf>.

Speed to Repopulate Area

Helping communities affected by the tornadoes restore some level of normalcy is a long-term effort. Commercial, residential, and other buildings and facilities must be repaired, rebuilt, or demolished and restored. Also, replenishing the broken and uprooted trees in communities will not only take time, but a significant financial investment. In addition, assistance to businesses and service providers to continue operating are critical.



Figure 38: Repair and cleaning efforts begin on a neighborhood damaged by a tornado system that destroyed homes and cut off access to utilities in Dayton, Ohio. (John Minchillo/AP)



Figure 39: Storm damage litters a residential neighborhood, in Dayton, Ohio, Tuesday, after a rapid-fire line of apparent tornadoes tore across Indiana and Ohio overnight. The storms were packed so closely together that one crossed the path carved by another.

Financial Impact

Until Development secures data from FEMA, SBA and the Ohio Department of Insurance, total losses are unknown. However, the Columbus Dispatch reported in August 2019 insured losses from the storms impacting western Ohio total between \$465 million and \$480 million to date based on insurer survey data from the Ohio Insurance Institute. Ohio Insurance Institute president, Dean Fadel, stated that total is conservative and likely to increase. To date, insured clients filed more than 30,000 claims, about 70% of which are homeowner or auto claims. (Williams, 2019)

Furthermore, Montgomery County experienced a significant economic impact due to the tornadoes. According to Dayton Daily News, the city lost \$46.3 million in property values. Also, the county auditor stated a \$1.7 million loss in tax revenues that went to schools, libraries, parks, townships, and cities in 2020. Schools alone would lose more than \$900,000. Figure 40 shows tax losses by jurisdiction, schools, and services. (Stewart, Memorial Day tornadoes' toll: \$46.3M in lost property values, schools to lose big, 2019)

Tax impact from Memorial Day tornadoes

CITIES	Applications received	Total reduction in taxable value	Tax revenue loss
Trotwood	418	-\$18,430,000	-\$151,000
Dayton	205	-\$7,892,000	-\$28,000
Brookville	99	-\$3,173,000	-\$1,000
Clayton	33	-\$2,102,000	-\$8,000
Vandalia	16	-\$2,306,000	-\$3,000
Riverside	13	-\$1,145,000	-\$4,000
Englewood	7	-\$221,000	-\$435

SCHOOLS	Applications received	Total reduction in taxable value	Tax revenue loss
Trotwood-Madison City Schools	394	-\$16,773,000	-\$320,000
Dayton Public Schools	374	-\$10,635,000	-\$248,000
Northridge Local Schools	236	-\$5,625,000	-\$121,000
Brookville Local Schools	134	-\$4,409,000	-\$63,000
Vandalia Butler City Schools	59	-\$3,822,000	-\$61,000
Northmont City Schools	52	-\$3,741,000	-\$72,000
Mad River Local Schools	13	-\$1,145,000	-\$23,000

TOWNSHIPS	Applications received	Total reduction in taxable value	Tax revenue loss
Harrison Twp.	401	-\$8,353,000	-\$126,000
Perry Twp.	121	-\$3,987,000	-\$6,000
Butler Twp.	43	-\$1,516,000	-\$11,000
Clay Twp.	6	-\$234,000	-\$1,000

OTHER GOVERNMENTS	Applications received	Total reduction in taxable value	Tax revenue loss
Human Services Levy	1,268	-\$46,265,000	-\$223,000
Sinclair Community College	1,268	-\$46,265,000	-\$66,000
Dayton Metro Library	1,267	-\$46,254,000	-\$53,000
Miami Valley Career Technology Center	881	-\$34,485,000	-\$46,000
MetroParks	1,268	-\$46,265,000	-\$32,000
Montgomery County	1,268	-\$46,265,000	-\$28,000
Developmental Disabilities	1,268	-\$46,265,000	-\$6,000

TOTAL	Applications received	Total reduction in taxable value	Tax revenue loss
Total	1,268	-\$46,260,000	-\$1,700,000

*Figure 40: Tax impact from Memorial Day tornadoes on Montgomery County
Source: Montgomery County Auditor's Office*

Recovery Efforts

Montgomery County's Disaster Recovery follows the FEMA Disaster Recovery Continuum: short-, intermediate and long-term recovery. Short-term recovery focuses on the days following the disaster including mass care and sheltering, clearing transportation routes, business support and emergency medical care. Intermediate recovery lasts weeks to months and includes interim housing, debris removal, business support, health care continuity, and community engagement to rebuild communities. Long-term recovery can take 10 years or more. Long-term recovery includes permanent housing, rebuilding

infrastructure, revitalizing the economy, reestablishing healthcare systems and mitigation activities. Montgomery County is now focused on the community's long-term recovery.



Figure 41: Twitter Post from ODOT Dayton on the night of the Tornadoes

Short-Term Recovery

Immediate Response Assistance

The county suggested residents affected by the tornadoes contact their landlord or property management company to request recommendations for alternate living situations and terminating rental agreements to locate suitable housing arrangements in the tornadoes' aftermath. Also, residents were eligible for a refund of their security deposit as a result of vacating inhabitable housing. Residents could utilize resources such as grant and loan programs to receive funding to repair homes and businesses. Overall, communities utilized charitable and nonprofit services available to them. In addition to managing housing issues, communities prioritized clearing debris and providing water and basic living items.

Recovery Efforts of Volunteers



Figure 42: Volunteers offer water and assistance to neighbors in Terrace Park, after tornadoes touched down in Brookville, destroying numerous homes and leaving scattered debris on May 28, 2019. Meg Vogel



Figure 43: Volunteers distributed food and supplies at Kroger on W. Siebenthaler Ave., in Dayton on May 31, 2019. Relief efforts continue after multiple tornadoes struck the area on May 27th. The National Weather Service rated the tornadoes as high as EF3. Sam Greene/The Enquirer



Figure 44: Volunteers from Mathew 25 Ministries and Procter & Gamble collect laundry to be washed for free at the Home Depot location on Salem Road in Trotwood on May 31, 2019. Relief efforts continue after multiple tornadoes struck the Dayton area on May 27th. The National Weather Service rated the tornadoes as high as EF3. Sam Greene/The Enquirer



Figure 45: Paulina Ambrosio, 14, of Dayton, unpacks pallets of diapers at the Mathew 25 Ministries relief depot at the Montgomery County Fairgrounds in Dayton on May 31, 2019. Relief efforts continue after multiple tornadoes struck the area on May 27th. The National Weather Service rated the tornadoes as high as EF3. Sam Greene/The Enquirer

Stakeholders in Community

- Assistance for Homeowners
 - United Way's 211 Helpline- Helps navigate the local nonprofit network and assist with problem solving and crisis intervention. This is the recovery system's primary marketing and entry point.
 - Miami Valley Community Action Partnership – Helps with moving expenses, rental deposit, rent and utility payments, and short-term case management. Partners with local communities to eliminate poverty causes and conditions and promote individual independence and self-sufficiency.
 - Available Housing Units (MVCAP) – Provides a map of available units
 - St. Vincent de Paul Conferences – Aids with moving expenses, rental deposits, rent and utility payments, and short-term case management.
 - Miami Valley Fair Housing Center – Works to eliminate housing discrimination and ensure equal housing opportunity for all people.
 - Auditors Office Notice for Home/Property Owners – Determines eligibility for a deduction in taxable property value.
 - Greater Dayton Premier Management- (Metropolitan Housing Authority)- administers housing choice vouchers and offers public housing. – Gives additional preference points to people displaced by the tornado for its public housing units per HUD approval.
 - Ohio Realtors Housing Disaster Relief Fund – Provides up to \$1,000 to qualified applicants to assist with owner or rental repairs resulting from the tornadoes.
 - Federal Loan Bank Disaster Reconstruction Program (DRP) – Provides grants of up to \$20,000 toward repair of their primary residences, or eligible for \$5,000 towards purchasing a home to eligible homeowners in Greene, Miami, and Montgomery counties following the storms.
 - Montgomery County Transitional Housing – Provides short-term stay and assistance in locating and moving into permanent home. Units operated by charities or nonprofits for single parents, children, the disabled, and others in the Montgomery County and greater Dayton community.
 - Dayton Foundation - Established a Disaster Relief Fund to support the tornadoes' immediate aftermath by supporting groups' emergency efforts. Committed additional funds for long-term disaster recovery efforts. Also provided volunteers and volunteer coordination.

- Salvation Army – Provides financial assistance for utility and energy bills, shelters for homeless men, women and children, rent assistance, emergency food and heating bills payment assistance, free school supplies, winter coats, and social development programs.
- Germantown Community Services – Volunteer-run assistance program that helps people living in Farmersville and Germantown with mortgage and rent expenses, food, utilities, heating bills, and medication.
- Community Action Partnership of the Greater Dayton - Provides various assistance programs and services for families and individuals residing in Montgomery, Butler, Darke, Greene, Warren and Preble counties.
- Volunteers of America – Provides advice to low-income and working poor families struggling with rent payments or facing eviction. Food, thrift stores, and Christmas toys or gifts may also be offered in Dayton.
- Veterans Service Commission - a county agency dedicated to serving Montgomery County veterans and helping veterans.
- Veterans Affairs Disaster Assistance – Provides current disaster guidance, forbearance requests, moratorium on foreclosures, late charge waivers, credit and VA reporting, and VA Home Loan information.
- DAV Disaster Relief - Provided a total of 470 drafts totaling \$296,250 and roughly 370 Comfort and Hygiene supply kits. The kits – which included backpacks, blankets and hygiene kits – provide an additional resource for safety, comfort, and self-sufficiency in an extended emergency, disaster or evacuation.
- Montgomery County Veterans' Services Deductible Assistance – Provides assistance when navigating U.S. Department of Veterans Affairs (VA) services including compensation claims and widows' benefits. Financial assistance to eligible veterans and family members with a demonstrated need.
- Airman and Family Readiness Center - Offers emergency financial assistance and grants to military members and their families in Montgomery County. Funds can be used to pay for rent, vehicle repairs, miscellaneous living expenses, funeral costs, or other expenses. Some expenses, such as medical and dental bills, will be covered by no-interest loans.
- Assistance for Businesses
 - Small Business Association - Offers low-interest disaster loans direct from the U.S. Treasury for businesses of all sizes, nonprofit and faith-based organizations, and homeowners and renters for underinsured and uninsured losses.
 - Dayton Area Chamber of Commerce – Provides resource listing for impacted business owners.
 - Business First - Connects businesses with resources and assistance.
- Local Charities and NPOs
 - Foodbank Pantry- serves as the primary source of food for the hunger relief network in the Miami Valley. Relieves hunger in the community through a network of partner agencies by acquiring and distributing food
 - Local Churches provide spiritual support and guidance
 - Montgomery County Department of Job Prevention and Human Services – Provides job and financial assistance.
 - East End Community Service Corporation - Provides emergency financial assistance paying utility, water, heating, and electric bills before disconnection.
 - Sunrise Center - Offers referrals to Montgomery County programs, coordinates and advises individuals and families on available social services.

- Good Neighbor House – Provides advice and assistance to residents living in poverty on food assistance, counseling, wellness education, medical and dental care, and clothing.
- Gospel Mission - Focused on food as part of the Fishes and Loaves Program. Also provides furniture, counseling, gently used computers for job seekers, and other basic needs.
- Medical Assistance
 - Reach Out of Montgomery Ohio – Provides information on and access to healthcare services by helping children and their families find a primary healthcare provider, insurance, and prescription medications.
 - Wellness Connection of Miami Valley - Provides health care and medical bill assistance to improve conditions for individuals and families that may be afflicted with heart disease and cancer through direct service (medication and equipment assistance, help with bills and advice on medical debts, transportation, support groups), promoting health awareness, and supporting health care professionals in Montgomery County.
 - Montgomery County Clinics – Provides medical services through nonprofit, government-certified, and/or free community clinics.
- Legal Assistance and Document Replacement
 - Legal Aid of Western Ohio (LAWO) – Provides free help with civil legal problems.
 - Advocates for Basic Equal Equality (ABLE) – Provides free help with civil legal problems
 - County Recorder – Provides free property deeds to homeowners who have been directly and substantially impacted.
 - VITA Tax Assistance - Provides advice, guidance, and free tax returns.
 - Department of Job and Family Services of Montgomery County – Accepts applications for state and federal government public aid and benefits. The Dayton office administers assistance programs for low-income households, elderly, veterans, and disabled populations.
 - Greater Dayton Volunteer Lawyer - Offers free civil legal services, advice, and consultations to low-income individuals in Montgomery County.

Community Feedback

Communities were terrified and devastated when the 20 catastrophic tornadoes occurred on Memorial Day 2019. Residents were primarily concerned about family members; wondering if they were hurt, where they will live, and if they will be able to provide for them. In the aftermath, residents are still concerned about repair costs and, if they have it, what insurance will cover. Residents are also upset about losing their possessions and the devastation the tornadoes caused in their communities.

However, residents responded powerfully. Surrounding cities and townships helped with recovery efforts by volunteering to provide water, helping with debris removal, and donating necessities to affected residents. Cincinnati-based Proctor and Gamble supplied laundry trucks for residents to wash laundry free of charge. While they wish the recovery process was quicker, residents remain hopeful and resilient and continue to work together to rebuild their communities.

After the storms, residents told the Dayton Daily News that within hours, neighbors started working to remove trees, provide food and water, and organize volunteer cleanup efforts. “There were people coming down the hill with food and supplies for a good solid month,” said one Dayton resident.

Residents want some normalcy as quickly as possible. They are proud of their resilience and grateful for help and donations but are concerned about being forgotten. Recovery efforts have not fully restored their communities and they continue to need support.

Short-Term Assistance

Montgomery County residents received individual and public assistance from Federal Emergency Management Agency (FEMA). Ohio Development Services Agency's (Development), Office of Community Development (OCD) is currently working to secure a data feed detailing the assistance FEMA provided. Development is also working on a Memorandum of Agreement (MOA) with the Ohio Department of Insurance and Small Business Administration.

Many people turned to the federal government for help. According to the Dayton Daily News, FEMA received 4,632 applications for assistance from Montgomery County, 600 from Greene County and 117 from Miami County. Montgomery County residents who rent submitted more than half of the applications. Of the 2,726 homeowners and 2,604 renters who applied for help from FEMA, 254 homeowners and 1,057 renters were approved. In total, the federal agency provided more than \$3.7 million in direct assistance. The most common reasons FEMA denied assistance to homeowners included insufficient damage, the damage was insured, FEMA was unable to reach the applicant for inspection, or the applicant did not verify he or she lived in the home during the storm. (Stewart & Sweigart, Tracking the money: How millions in tornado assistance is being spent, 2019)

On May 29, 2019, the Dayton Foundation created a Disaster Relief Fund to support recovery efforts. Since then, it has received roughly 3,400 gifts globally, totaling nearly \$1.8 million. The foundation spent about \$863,000 in the storms' immediate aftermath supporting group emergency efforts such as the St. Vincent de Paul homeless shelter and the Red Cross operations. The balance is allocated to support long-term disaster recovery efforts once all other funds have been exhausted.

Long-Term Recovery Efforts

The local Emergency Management Agency developed the Miami Valley Disaster Recovery Leadership Board to successfully guide and support Miami Valley's long-term recovery efforts over the next six to 10 years. The board will provide strategic leadership, oversight, and transparency for the community on these efforts. The board will also assist with fundraising, communications, and potential policy and protocol creation to aid the community in rebuilding and recovering post-disaster, as well as strengthening the community's future disaster recovery capacity.

The board has 17 voting members: 12 from local core institutions and five at-large community members. Miami Valley Regional Planning Commission (MVRPC) will provide staffing and administrative support to the board. The board will create and convene sub-groups, as necessary. Roughly 40 government and non-governmental agencies serve on the board or act as a strategic partner on the Miami Valley Recovery Leadership Board.

Organization/Representing:

- Miami Valley Regional Planning Commission
- The Dayton Foundation
- Dayton Business Committee
- Dayton Development Coalition
- Chamber of Commerce
- GDAHA/Healthcare
- Sinclair Community College/Education
- City-Wide
- Montgomery County

- Greene County
- Miami County
- City of Dayton
- Community Members

The following local, state and federal entities are strategic partners and organizations contributing to the Disaster Recovery project recovery efforts:

- State of Ohio (Ohio EMA, JobsOhio, Development Services Agency)
- Local Disaster Recovery Managers: critical to ensure all parties understand coordinating and executing strategic recovery plan/goals and have equal access and technical support necessary to pursue various resources.
- Participating local governments include:
 - Montgomery County
 - Greene County
 - Miami County
 - City of Dayton
 - City of Trotwood
 - City of Brookville
 - City of Clayton
 - City of Vandalia
 - Harrison Township
 - City of Beavercreek
 - Beavercreek Township
 - City of Union
- Local economic development organizations and Chambers of Commerce
- Dayton Development Coalition
- Dayton Area Chamber of Commerce
- Greene County Chamber of Commerce
- Long-term Disaster Recovery Individual Assistance/Operations Group: representatives from local nonprofit organizations focused on disaster recovery and resiliency for individuals
- State and federal elected officials: to provide updates on the region's disaster recovery strategy and ensure communities have resources necessary to advocate for regional needs
- Federal agencies (EDA, FEMA, EPA, etc.): maximize and coordinate regional resources.

Miami Valley built a comprehensive, coordinated long-term disaster recovery system using the National Disaster Recovery Framework (NDRF) to serve all impacted counties. The NDRF provides guidance on recovery efforts by defining recommended roles, responsibilities, coordination and planning among all jurisdictions. Based on decades of disaster response best practices, it focuses on how to restore, redevelop and revitalize the community's health, social, physical, economic, natural and environmental fabric and build resiliency for the future.

MVRPC leads the Long-Term Community Disaster Recovery Network, part of the established NDRF for the Miami Valley region. MVRPC is working with Ohio EMA, FEMA and government leadership of all impacted communities to coordinate applying for, distributing and reporting on disaster aid, hazard mitigation and resiliency planning funding from multiple federal and state sources.

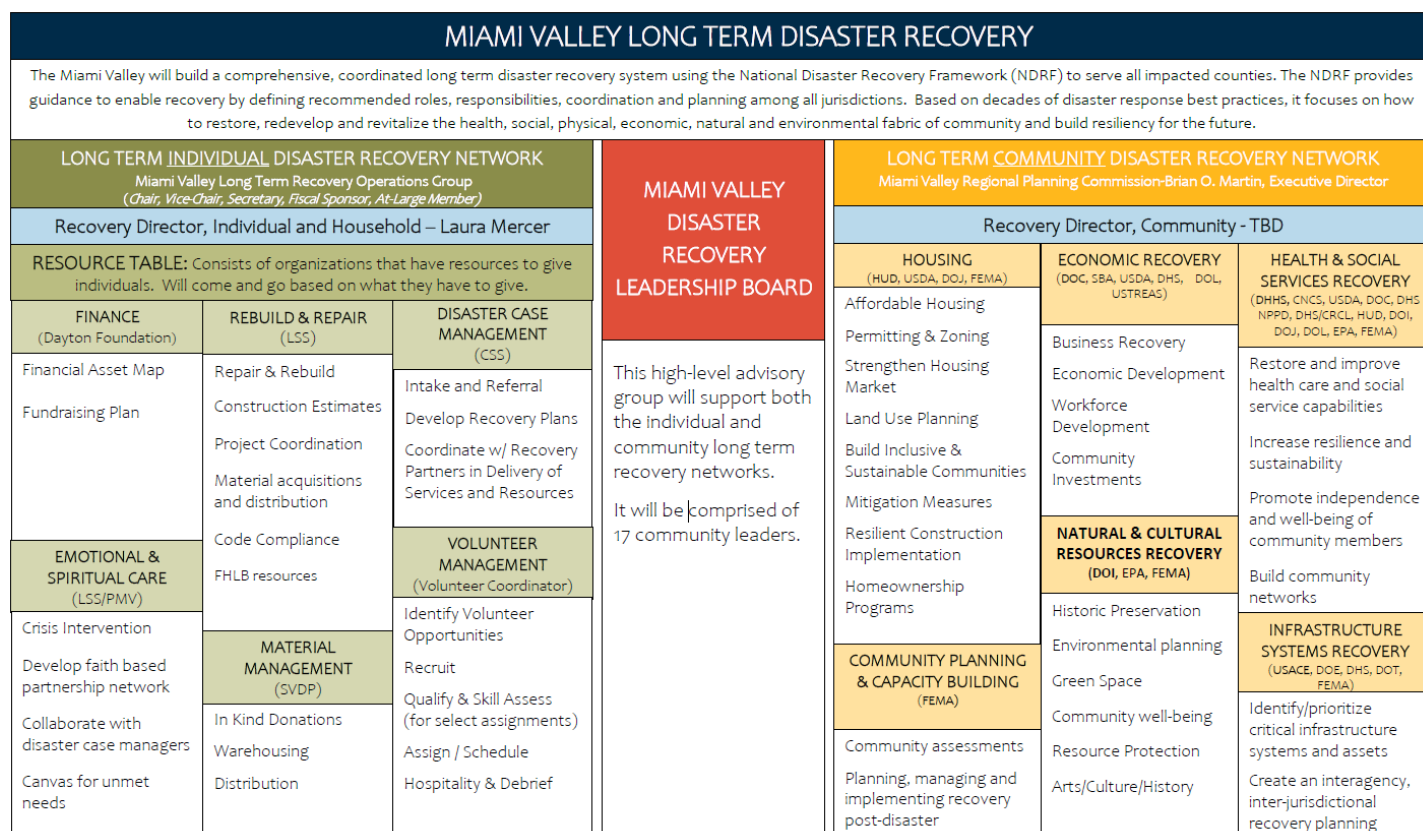


Figure 46: Miami Valley Disaster Recovery Leadership Board

Individual and Household Recovery

The Miami Valley Long Term Recovery Operations Group (MVLTRDG), Long-Term Individual Disaster Recovery Network leads individual and household recovery efforts. The group is a consortium of nonprofit organizations and community stakeholder groups working together to aid individuals and households in recovering from the Memorial Day 2019 tornadoes. The Executive Committee, headed by a loaned Executive Director from Sinclair Community College, leads the group. The Resource Table, a MVLTRDG subcommittee, assesses available resources and assigns them to a project. The recovery timeline for this group is one to three years.

MVLTRDG focuses on individual recovery and connecting resources to unmet needs. This allowed for all survivors in need of assistance to call *211 or visit <https://mvstrong.org/>. The Recovery Network provides case management to individuals and households seeking recovery assistance, whether financial, emotional/spiritual, or housing assistance related to the tornado events. A case manager assisted each survivor to review the household's situation and determine what help they needed. All survivors seeking assistance are receiving the resources they need to recover.

MVLTROG completed extensive outreach to ensure that tornado-impacted individuals are aware of the resources available to them. All survivors are connected to a disaster case manager who works with them to identify and meet their tornado-related needs. The case management process includes:

- Checking eligibility and duplication of benefits (i.e. verification that they were tornado impacted, and of what benefits they received [including FEMA Individual Assistance and insurance] and how those benefits were used);
- Securing disaster caused damage assessments and estimates;
- Packaging client cases for the MVLTROG Resource Table presentation; and
- Serving as a liaison to the survivor throughout the recovery process.

All client cases presented to the resource table were connected to resources they needed to be made whole. By leveraging the muscle, material and money (3Ms), described below, MVLTROG was able to resolve the region's home repair needs in a timely and efficient manner.

Muscle

- Voluntary Organizations Active in Disaster: MVLTROG worked with many engaged organizations that specialize in post-disaster repair and rebuild work.
 - Brethren Disaster Ministries established a national host site in Montgomery County in April 2020 and has been working continuously since that time.
 - Mennonite Disaster Services has been working since the disaster. First doing debris removal and tarping roofs, then moving onto repairs. In May 2020, they set up a host site to allow them to expand their presence and capabilities.
 - Several local groups including Southbrook Christian Church's Disaster Response Team and Presbyterian Disaster Assistance have also been key in the region's recovery work.
- MVLTDRG's construction management team supports these build teams' work. Leveraging resources creates efficiencies in completing repair work. For example, MVLTDRG recently completed a roof replacement estimated at \$15,000 based on contractor bids. By leveraging partnerships with the VOAD teams, MVLTROG received donated materials and financial assistance to complete the replacement.
- Local non-profit organizations engagement and contributions: Habitat for Humanity of Greater Dayton has been especially helpful with recovery efforts by completing large rebuild projects. In addition, County Corp, Miami Valley Community Action Partnership and Rebuilding Together Dayton have all been active partners in regional recovery.

Materials

- Good 360: A national organization that specializes in helping manufacturers and distributors donate excess inventory. With help from The Dayton Foundation, MVLTDRG received shingles, appliances, fixtures, furniture, and household goods for repairs.
- A local company, Boral Building Products, donated roughly 56 pallets of vinyl siding.
- Habitat and their local ReStore help to ensure MVLTDRG leverage donated materials where appropriate.

Money

- Greater Dayton Disaster Relief Fund: The Dayton Foundation launched the Greater Dayton Disaster Relief Fund immediately after the tornadoes. This fund received nearly \$2.8 million from 3,782 donations and supports individual household recovery needs through a resource table process. MVLTDRG's Resource Table grant funds for vetted, case managed survivors' repair/rebuild needs and through grants to front line organizations partnering on recovery work with local organizations. As this fund continues to receive donations and Federal Home Loan Bank's (FHLB) Disaster Reconstruction Program (DRP) replenishes the fund through

reimbursements (see Federal Home Loan Bank Disaster Reconstruction Program description below). As of October 2020, the fund balance was \$1.5 million.

- Voluntary Organizations Active in Disasters (VOAD) contributions: Several of the partnering VOADs provided funds for recovery efforts.
- Federal Home Loan Bank Disaster Reconstruction Program: A coalition of financial institutions and nonprofit organizations are working to aid Dayton-area homeowners who need repairs due to tornado damage. This coalition will distribute a \$5 million fund available through Federal Home Loan Bank of Cincinnati's Disaster Reconstruction Program (DRP). Coalition partners include:
 - [CareSource](#)
 - [Huntington Bank](#)
 - [KeyBank](#)
 - [County Corp](#)
 - [Rebuilding Together Dayton](#)
 - [Habitat for Humanity of Greater Dayton](#)
 - [Miami Valley Community Action Partnership](#).

Homeowners in Greene, Miami and Montgomery counties who need home repairs may be eligible for grants of up to \$20,000 toward repairing their primary residence. Homeowners who have less than \$2,500 in repairs receive funds directly. Homeowners seeking repair assistance should call *211, the coalition's single point of contact for assistance. Additionally, residents who need assistance purchasing or constructing a new home, the DRP can provide existing qualified homeowners in the affected counties with grants of up to \$20,000 towards purchasing or constructing a new home. Renters in the affected counties may also be eligible for \$5,000 towards a home purchase.

As of October 1, 2020, Federal Home Loan Bank approved 49 requests for assistance totaling \$645,393. To date, applicants requested \$655,000 for acquisition and \$754,000 for rehabilitating properties.

Greater Dayton Premier Management (GDPM), the largest local affordable housing provider, is a critical part of the long-term recovery process and can provide Housing Choice Vouchers for households who urgently need a rental subsidy. GDPM received approval from HUD to give additional preference points to people displaced by the tornadoes for public housing units. In addition, GDPM housed income-qualified tornado victims and waived security deposits. Waiting list participants affected by the tornadoes contacted GDPM's office to update their application for housing preference points. As of August 2019, 151 waiting list participants claimed the additional preference points. Of that number, 38 completed the verification, signed a lease and moved into public housing.

Community Recovery

MVRPC and the Long-Term Community Disaster Recovery Network Community lead recovery efforts. Under MVRPC's leadership, the Network consists of representatives from local jurisdictions, government agencies and community stakeholders. These partners work collaboratively on long-term recovery efforts focused on community rebuilding, economic recovery, infrastructure, urban planning and local policy. The recovery timeline for this group is five to 10 years. The Dayton Foundation committed some Disaster Relief funds toward longer-term community recovery for parks and infrastructure needs.

The Disaster Recovery project will have significant, long-term economic benefits to the Miami Valley region, especially since Opportunity Zones overlap disaster-impacted communities. The Community Long-Term Recovery's central focus is intentionally and strategically incorporating infrastructure enhancements, mitigation actions and inclusive, comprehensive planning in economic recovery decision

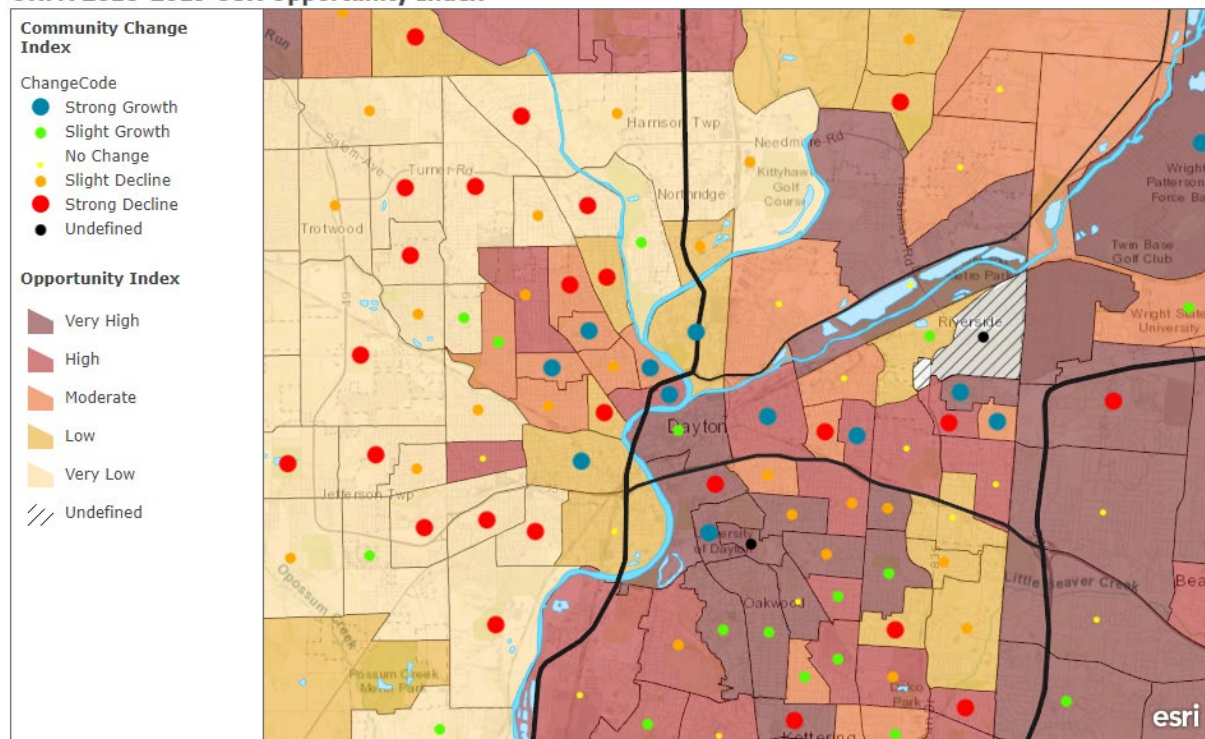
making to build resiliency and preparedness for future natural disasters and unforeseen industry disruptions.

As a result of the tornadoes, serious concerns exist regarding workforce depletion, adverse impacts to industry and comprehensive mitigation and resiliency planning needs. Because of the vast devastation in disaster-impacted commercial corridors, there will be an intense focus led by the MVRPC Disaster Recovery Manager to create a robust economic reuse and redevelopment strategy for the region. There are 17 Opportunity Zones that directly correspond to disaster-impacted areas. The MVRPC Disaster Recovery Manager will focus on Opportunity Zone management, convening community stakeholders to develop an investment plan and identifying potential projects for each Opportunity Zone. The Disaster Recovery Manager will work with regional partners including the business community and economic development organizations to mitigate unemployment impacts and workforce challenges through job-skill development and training, industry diversification, business expansion, employment alternatives and synergy between retention and outside investment strategies.

Opportunity Index

OHFA and the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University collaborated to develop a mapping tool to support affordable housing development for households and families and to advance the state's Annual Plan goals, including promoting strategies that advance and promote compliance with the Fair Housing Act. The Opportunity Index utilizes several indicators to identify dimensions of strong, vibrant and healthy communities and will be used to identify areas of opportunity, particularly regarding locating family housing sites in Ohio. The Kirwan Institute defines opportunity as a set of conditions that place people in positions to be more likely to succeed or excel. Analyzing differences in access to opportunity structures aligns with state and federal initiatives to further fair housing, deconcentrate poverty and maximize equitable outcomes for low-income households.

OHFA 2018-2019 USR Opportunity Index

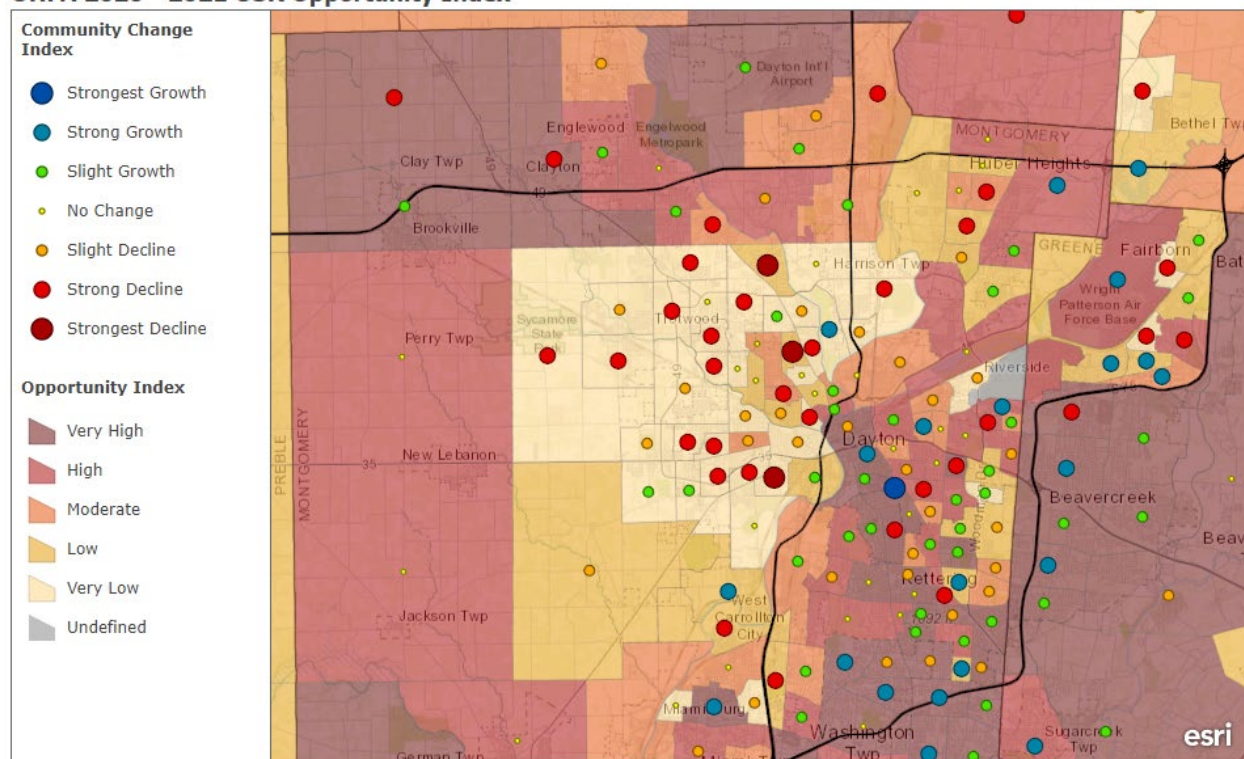


The 2018-2019 USR Opportunity Index is a new data tool developed by the Ohio Housing Finance Agency and The Kirwan Institute for the Study of Race and Ethnicity to aid developers and advocates in the placement of low income housing.

County of Montgomery, OH, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | source: National Hydrography Dataset - USGS | Sources: Esri, Bureau of Transportation Statistics, GeoSystems Global Corporation in association with National Geographic Maps and Melcher Media, Inc.

Figure 47

OHFA 2020 - 2021 USR Opportunity Index



County of Montgomery, OH, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

Figure 48

According to the Kirwan Institute, opportunity is a set of conditions that people experience. When considering relocating in opportunity-rich communities, housing and neighborhoods are primary criteria for most families. Ohioans seeking social opportunity want meaningful human connections, access to education, and a stable social network. Those seeking economic opportunity want access to living-wage jobs, a strong housing market, and a desire to benefit from national economic growth. The American Dream combines the concepts of economic and social opportunity by describing an American culture that is both equitable and fair; stable and inclusive. By clearly defining opportunity as access to both social and economic structures that create a set of conditions placing people in positions to be more likely to succeed or excel, opportunity matters to all Ohioans. (Sweeney, Outrich, Forcone, & Kenitzer, 2019)

Using pre-disaster data, the 2020-2021 USR Opportunity Index showed the Trotwood, Harrison Township and Northwest Dayton areas, those most impacted by the tornadoes, had the very lowest opportunity index for Ohioans.

Fair Housing

The State of Ohio conducted an Analysis of Impediments to Fair Housing Choice (AI) in 2020 to identify impediments to fair housing in non-entitlement areas of the state. Identified impediments and recommended actions are outlined in the table below.

In Ohio, the HUD-identified most impacted and distressed area resulting from the major disaster that occurred in 2019 is ZIP Code 45426, located in Montgomery County (85 FR 4681). Montgomery County, an entitlement jurisdiction, participated in a regional AI in 2015, entitled “Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering, OH”. In addition, Montgomery County participated in a 2016 – 2020 regional fair housing plan with the cities of Dayton and Kettering.

In administering its CDBG-DR award, the State of Ohio will affirmatively further fair housing and support Montgomery County’s ongoing fair housing efforts.

¹ State of Ohio Fair Housing

Impediment	Tactics
Lack of affordable housing. The statewide shortage of affordable housing limits housing choice and disproportionately impacts members of protected classes, especially minority populations, families with large households, and individuals with disabilities.	The Office of Community Development (OCD) will continue to offer a variety of affordable housing programs that leverage federal and state funds. Ohio’s affordable housing programs have been supported by the following sources of funds since 1993: • Community Development Block Grant (CDBG) – Federal • Ohio Housing Trust Fund (OHTF) – State • Neighborhood Stabilization Program (NSP) – Federal • National Housing Trust Fund (NHTF) – Federal • HOME Investment Partnerships Program (HOME) – Federal

¹ From: State of Ohio Analysis of Impediments (May 2020)

Impediment	Tactics
	OCD provides communities and nonprofit organizations with funding to help preserve and expand the affordable single-family housing stock in Ohio, promote affordable housing opportunities and improve housing conditions for low-income families through the Housing Assistance Grant Program and the Community Housing Impact and Preservation (CHIP) Program. • <u>Housing Assistance Grant Program</u>: This program is available to nonprofit agencies that contract with local qualified construction companies to complete home repairs and renovations. The program enables homeowners at or below 50% of median income to stay in their homes by providing essential home repairs and renovations for handicap accessibility. ○ Approximate Budget for 2-year Grant: \$4.5 Million ○ Approximate Outcome for 2-year Grant: 1,570 Households • <u>Community Housing Impact and Preservation (CHIP) Program</u>: This program is available to local governments to preserve and improve the affordable housing stock for low-to-moderate income Ohioans and strengthen neighborhoods through community collaboration. CHIP activities include: ○ <i>Owner and Rental Rehabilitation Assistance</i> –corrects substandard conditions so that homes are safe, healthy, durable, energy-efficient, and affordable. ○ <i>Owner and Rental Repair Assistance</i> – designed to correct one or more specific deficiencies that adversely affect the occupant's health and safety and/or the house's structural integrity. ○ <i>Homeownership Assistance</i> – provides assistance to families to purchase homes. It may include a subsidy to lower the interest rate for the loan and/or principal amount, providing down payments, and paying reasonable closing costs. ▪ <i>Down Payment Assistance and Rehabilitation</i> – homeownership assistance combined with rehabilitation assistance on an existing home that does not meet applicable standards. ▪ <i>Down Payment Assistance only</i> – homeownership assistance on a new or existing home that already meets applicable standards. ▪ <i>New home construction in partnership with Habitat for Humanity</i> – homeownership assistance provided for a newly constructed home to a family qualified by a Habitat for Humanity affiliate. ○ <i>Tenant-Based Rental Assistance</i> – provided to property owners to subsidize an income-eligible tenant's monthly rent payments. The assistance can also include security and utility deposits. ○ Approximate Budget for 2-year Grant: \$23 Million ○ Approximate Outcome for 2-year Grant: 873 Households

Impediment	Tactics
	OCD also provides funds to the Ohio Housing Finance Agency (OHFA) to support the capacity of multi-family housing development organizations and provide financing for eligible housing developments to expand the decent, safe, affordable housing supply for very low- to moderate income households. Funding is provided through OHFA for the Housing Development Assistance Program (HDAP) and the HOME Community Housing Development Organizations (CHDOs) Set-aside Program. • <u>Housing Development Assistance Program (HDAP)</u>: This program provides grants and loans for the development and preservation of affordable housing. Awarded as soft funding, HDAP resources enable developers and owners of affordable housing to serve households at or below 50% of Area Median Income (AMI). ○ Approximate Budget for 4-year Grant: \$26 Million ○ Approximate Outcome for 4-year Grant: 2,146 Households • <u>HOME Community Housing Development Organizations (CHDOs) Set-aside Program</u>: The state of Ohio receives a yearly allocation of HOME funds from the Department of Housing and Urban Development. Fifteen percent (15%) of those funds must be "set-aside" to be awarded to CHDOs to develop housing. The Ohio Housing Finance Agency (OHFA) administers this program and distributes the set-aside funds for the state through its Housing Tax Credit (HTC) program in the form of gap financing for HTC developments. OHFA offers several additional Multifamily Housing Development Programs that facilitate the development of affordable housing, including the Housing Tax Credit Program, Housing Development Loan (HDL) Program, Multi-family Lending Program (MLP), and the Multi-family Bond Program. • <u>Housing Tax Credit Program</u>: The Low-Income Housing Tax Credit (LIHTC) program is a tax incentive program designed to increase the supply of quality, affordable rental housing by helping developers offset the costs of rental housing developments for individuals with low- to moderate-income. This program has been the largest driver of the production of new affordable housing in the state and nation over the past several years. Since 1987, OHFA has used the HTC program to facilitate the development of over 100,000 affordable rental housing units in Ohio. • <u>Housing Development Loan (HDL) Program</u>: The Housing Development Loan (HDL) program provides short-term, low-interest loans to developers who have an award of housing credits through either the competitive (9%) Low-Income Housing

Impediment	Tactics
	Tax Credit round or the Bond Gap Financing (BGF) round. Funding comes from the Ohio Department of Commerce, Division of Unclaimed Funds. • <u>Multi-family Lending Program (MLP)</u>: The Multi-family Lending Program (MLP) provides long-term, permanent financing for multi-family rental housing developments that serve low- to moderate-income residents. • <u>Multi-family Bond Program</u>: The multi-family bond program provides lower-cost debt financing for the acquisition, construction and substantial rehabilitation of multi-family housing and single-family housing for low- and moderate-income residents through the issuance of tax-exempt mortgage revenue bonds.
Need for fair housing education. Non-entitlement local governments overwhelmingly indicate that citizens in their communities lack a basic understanding of fair housing rights. Local governments noted a strong need for improved education for the general public, local government officials, social service agencies and housing providers.	• OCD will continue to require each local government grant recipient to develop and implement a Standard Fair Housing Program, which includes focused fair housing education and outreach. Local governments must design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups. In addition, to reach a broad community audience, local governments must also develop an annual plan to distribute fair housing brochures, pamphlets, posters and other informational materials to 10 area agencies, organizations, or public events. • OCD will continue to operate the New Horizons Fair Housing Assistance Program. This program provides discretionary funds to units of local government, or consortia of units of local government, to implement innovative training, outreach, and planning activities that serve to affirmatively further fair housing. New Horizons fair housing strategies are based on locally assessed needs and further the state's fair housing goals. Eligible jurisdictions include direct Community Development Program Allocation cities and counties. OCD allocates up to \$50,000 annually to the New Horizons Fair Housing Assistance Program. • OCD will encourage grantees to develop or strengthen relationships with the Ohio Civil Rights Commission (OCRC) to address discrimination in the community through services the Commission provides.
Lack of accessible housing.	• In all Ohio Housing Finance Agency (OHFA) funded projects, 5% of all units in each development shall meet Section 504 requirements. An additional two percent of all units shall be

Impediment	Tactics
An estimated 14% of Ohioans identify as having a disability, and 64% of discrimination complaints in non-entitlement communities are based on disability (Table 9; Appendices 10-14). This suggests that individuals with disabilities may face a disproportionate difficulty in accessing suitable housing.	sensory compatible for persons with sight and hearing disorders. Site features and common areas shall be accessible including but not limited to dumpsters, outdoor grills, parking, play areas, and community shelters. Accessible units should be provided in a variety of unit configurations. • OHFA will continue to endorse the Universal Design concept and all units utilizing OHFA resources must be designed to meet those principals to the greatest extent practicable. OHFA encourages developments to incorporate the Principals of Universal Design and the Goals of Universal Design. • OHFA, Ohio Department of Medicaid (ODM), Ohio Department of Developmental Disabilities (DoDD) and Ohio Department of Mental Health and Addiction Services (OhioMHAS) have partnered to implement the Ohio 811 Project Rental Assistance program. This program allows extremely low-income households composed of one or more adults with a disability to live in an integrated setting through rental subsidy and access to supportive services. Residents pay 30% of their income toward rent. The 811 program provides rental subsidy to cover the difference between the rental payment and the 50% tax credit rent for the unit. 496 units across the state of Ohio have commitments for the program, 171 are under contract, and 22 are leased. The balance of the units are undergoing environmental review or are under construction. All units are expected to be filled by 2023. Each rental assistance contract is for a period of 20 years. • Additionally, OHFA and the above stated partners have submitted a proposal to HUD in response to a NOFA for additional 811 Project Rental Assistance Program funds. Awards are expected to be announced by the end of summer 2020. If awarded, rental subsidy for an additional 250 housing units would be made available for qualifying individuals with disabilities. • The Ohio Department of Medicaid Subsidy Demonstration (ODMSD) program is a partnership between ODM and OHFA that is similar to the 811 Project Rental Assistance program. ODMSD targets extremely low-income people with disabilities who are exiting facility-based settings and who require accessible housing. OHFA has awarded 15-year contracts to 8 properties that will provide rental subsidy for 26 fully-accessible units. An additional 10 units are under construction and expect to be leased by the end of the year. Residents pay 30% of their income toward rent. The ODMSD program provides rental subsidy to cover the difference between the rental payment and the 50% tax credit rent for the unit. • OCD will provide specialized training to grantees to facilitate an understanding of basic universal design principles. • OCD will link grantees with resources, agencies and organizations in the community that serve disabled residents.

Impediment	Tactics
	OCD will discuss with communities how zoning and building codes can address housing barriers for disabled residents.
Limited access to public transit in rural areas. The scarcity of public transit options in Ohio's small cities and rural communities presents impediments to housing choice for those with disabilities, older adults, and individuals without personal automobiles. Access to transportation options in many cases may be the sole determination of where a family or individual is able to seek housing.	According to the Ohio Department of Transportation, Ohio's 34 rural transit agencies spend about \$38 million a year to provide service. Although this is a small portion (about 4%) of the overall transit investment, rural services operate in 35 counties and provide more than 2 million trips annually. Approximately half of existing funding for rural agencies comes from the federal government. Many rural areas also raise funds by contracting with human service agencies and other partners. Local funds, passenger fares and state funds are also important resources for the rural agencies. There are about 550 vehicles in Ohio's rural fleet. An estimated 150 buses and vans are past their useful life and need to be replaced in the immediate term. Rural areas also need more service. The analysis found a current need for an additional 1 million transit trips. By 2025, as Ohio's rural population continues to grow older and rely more on public transit, the need for service will grow to more than 4 million trips each year. This estimate does not include the 27 Ohio counties that do not have any existing public transit service. These communities currently need roughly 2 million trips and are expected to need 3 million trips per year by 2025. The 2015 investment needs for rural communities include: <i>System Preservation</i> - \$22 million to replace vehicles already beyond their useful lives, and \$11 million to purchase vehicles expiring in 2015 and fund other infrastructure needs. <i>System Expansion</i> - \$18 million to operate and \$11 million to purchase vehicles for additional service in areas that already have some transit. <i>New Systems</i> - \$48 million for transit service in the 27 counties that currently have none. Noted Benefits of Investing in Rural Transit: - Ensure all Ohio residents have access to some public transportation. Expanding service to areas that currently do not have public transportation would reach an estimated 1 million individuals. - Provide access to jobs, job training, health care and basic personal services. Expanding mobility is important statewide, but

Impediment	Tactics
	especially for people living in Ohio’s small towns and rural communities and for employers needing a workforce that can get to work. Transportation needs in these areas are expected to increase as their populations grow older and poorer. Investing in services now will ensure the state has infrastructure in place to support individuals, Ohio businesses and health and human service programs. The Ohio Department of Transportation’s recommended short-term strategies to invest in rural transit to meet the needs of older adults, disabled, and low-income individuals and households include: • Incentivize coordination between human service and public transportation. Grants may also support extending or providing service in counties where none exist. • Establish a cabinet-level Human Service Transportation Coordinating Committee to examine statewide policies to encourage coordinated transportation services. Largely aimed at rural counties and systems, this committee would include, at minimum, the Ohio Department of Job and Family Services, Ohio Department of Medicaid, Ohio Department of Aging, and Ohio Department of Transportation. • Establish a Blue Ribbon Funding Committee to identify and move forward a statewide dedicated public transportation funding source. This would benefit urbanized areas and also address significant rural transit needs.

Summarizing Community Resiliency

The University of Dayton recently published “[Dayton’s Darkest Summer: The Rise from Tragedy](#)” video. It illustrates the community’s strength and resiliency as they recover.

Part 2: Estimating Unmet Needs

The need estimation is based upon data available at the time of this assessment. Ohio has not received damage estimates or data from FEMA, the Small Business Association or the Ohio Department of Insurance. This needs assessment reflects information received from the MVRPC, MVLTRG, Montgomery County, and reputable online news sources. The assessment will be reevaluated and updated as more information is provided.

The Memorial Day 2019 tornadoes that hit Montgomery County largely impacted its housing stock, affecting all neighborhoods including affluent suburbs, rural communities and inner-city neighborhoods. The property damage assessment conducted by the Montgomery County Auditor's Office detailed more than 5,000 affected properties, mostly impacting the county's most vulnerable populations. Of that total, 52% were single family dwellings, 46% apartments, and 2% mobile homes. The community and long-term recovery board identified housing as the largest unmet need. Many victims of the Memorial Day tornadoes in Montgomery County are still believed to be living with relatives and couch-surfing.

Housing

Prior to the disaster, the Ohio Housing Finance Agency (OHFA), as part of their annual housing needs assessment, calculated the affordable housing demand in Ohio by census tract. The assessment estimated that Montgomery County had 40,913 very-low income (VLI) renters, with only 29,839 affordable rental units available, an 11,074 shortage of available affordable rental units for the very-low-income population.

Montgomery County has 281 active housing tax-credit-funded permanent supportive housing rentals, ranking third statewide. They are fifth in active non-housing tax credit OHFA-financed affordable rental units with 224 units. Montgomery County had 6,872 active HUD-subsidized rental units.

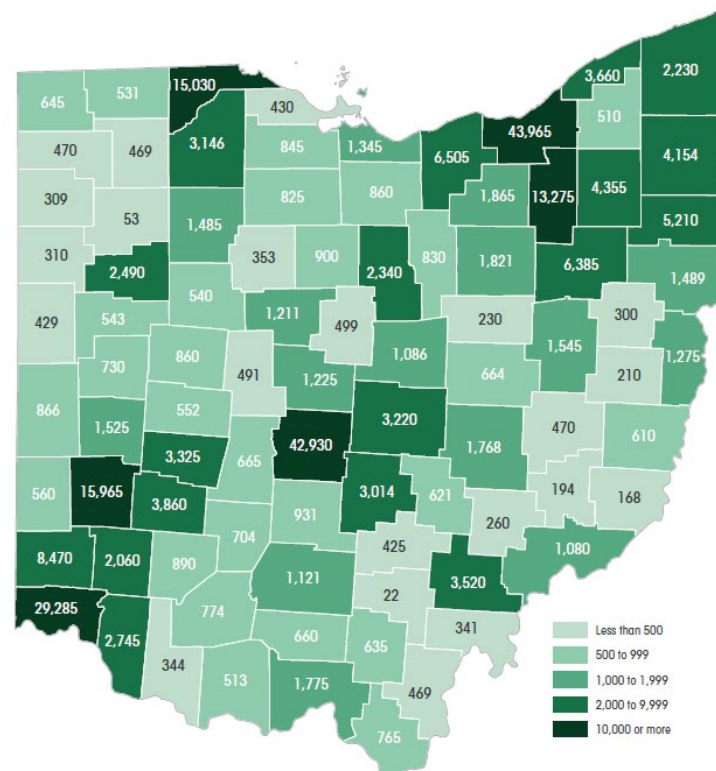


Table 4: HUD Damage Categories

Category	FEMA inspected real property damage
Minor-Low	< \$3,000
Minor-High	\$3,000 - \$7,999
Major-Low	\$8,000 - \$14,999 and/or 1 to 4 feet of flooding on the first floor;
Major-High	\$15,000 - \$28,800 and/or 4 to 6 feet of flooding on the first floor.
Severe	> \$28,800 or determined destroyed and/or 6 or more feet of flooding on the first floor.

The average cost to fully repair a home to code for a specific disaster within each of the damage categories noted above are calculated using the multipliers provided by HUD for Ohio (see in the table below). The multipliers use the median real property damage repair costs determined by the Small Business Administration for its disaster loan program. By multiplying the number of units by the multipliers, the housing unmet needs was calculated.

Table 5: HUD 2019 Serious Housing Unmet Needs (Data from 11-15-2019)

Grantee	Ohio
Disaster Number	4447
Disaster Type	Severe Storms/ Tornadoes/ Flood/Wind/ Landslides/ Mudslides
Serious Unmet Housing Need Estimate Most Impacted Area	\$4,713,745
County Most Impacted Areas	0
Zip Code Most Impacted Areas	1
Total Most Impacted Areas	(No less than \$9,844,000) Zip Code: 45426 (Montgomery)
Total Any Damage	710
Total Serious Damage	256
Owner Serious Unmet	3
Renter Serious Unmet	133
Total Serious Unmet	136

Ohio Serious Unmet Housing Need Multipliers

Major-low	\$21,666
Major-High	\$37,804
Serve	\$38,965

However, based upon the Montgomery County Auditor's property assessments of the HUD-identified Most Impacted and Distressed Area (MID) the impact to housing greatly exceeded original estimates. HUD identified 710 units with damage and 256 units severely impacted, however, the Auditor's Office identified 1,027 units destroyed and two additional inaccessible/condemned.

Table 6: Montgomery County Damage Categories

FEMA	County Auditor's Code	Degree of damage to impacted residences
Minor-Low	Affected: 2-Shingle Damage	Some shingle and/ or Tree Damage, but still habitable
Minor-High	Affected: 3- Roof Damage	Some roof damage and Tree Damage, but still habitable
Major-Low	Minor Damage: 4- Minor	Home is damaged and uninhabitable, but may be made habitable in short period of time with repairs

FEMA	County Auditor's Code	Degree of damage to impacted residences
Major-High	Major Damage: 5-Major	Substantial failure to structural elements of residence (e.g., walls, floors, foundation), or damage that will take more than 30 days to repair
Severe	Destroyed: 6-Destroyed	Total loss of structure, structure is not economically feasible to repair, or complete failure to major structural components (e.g., collapse of basement walls/foundation, walls or roof)

Table 7: Montgomery County MID Property Assessment After the Storm

MC Auditor Rating FEMA Category	Affected Minor-Low & High	Destroyed Severe	Inaccessible Severe	Major Major-High	Minor Major-Low	Grand Total
Harrison Township						
Apartment	9	292	0	138	285	724
Mobile Home/Trailer	70	12	0	6	12	100
Single Family Dwelling	298	44	1	150	268	761
Subtotal	377	348	1	294	565	1585
Trotwood						
Apartment	120	629	0	251	105	1105
Single Family Dwelling	223	50	1	159	298	731
Subtotal	343	679	1	410	403	1836
Grand Total for MID	720	1027	2	704	968	3421
Grand Total for County	1791	1177	8	1060	1627	5663

Based upon HUD's provided housing multiplier, the total estimated housing impact on Montgomery County is \$126,869,347 as detailed in the table below.

Table 8: Montgomery County Property Assessment Impact

Category	Ohio Housing Multiplier	Total County Properties Assessed in Category	Total Estimated Impact
Minor	\$3,000*	1791	\$5,373,000
Major-low	\$21,666	1627	\$35,250,582
Major-High	\$37,804	1060	\$40,072,240
Severe	\$38,965	1185	\$46,173,525
Total Impact			\$126,869,347

*\$3,000 is an estimate average cost based on FEMA's property damage range for this category.

Six months after the tornadoes, the Montgomery County Auditor's Office inspected units deemed Category 5 (Major Damage) or 6 (Destroyed) after the initial inspections. Of the original 1,177 original properties deemed 'Destroyed' (MC Auditor 6-Destroyed), 155 remain destroyed and/or untouched, with an additional 33 properties inaccessible. This does not provide a total count of housing units. One apartment property consisting of several buildings in Harrison Township has approximately 400 units that

were destroyed and inaccessible. Nearly 70%, 729, of the originally assessed 1,060 properties which had major-high (MC Auditor 5-Major) continue to have major property damage.

Table 9: Montgomery County Property Assessment Updated January 2020

MC Auditor Rating FEMA Category	Destroyed Severe	Inaccessible Severe	Major Major-High	Grand Total
Brookville	18		61	79
Butler Township	4		50	54
Clayton	3		12	15
Dayton	31		124	155
Englewood	0		2	2
Harrison Township	63	33	275	371
Perry Township	5		20	25
Riverside	1		1	2
Trotwood	25		178	203
Vandalia	3		6	9
Grand Total for MID	88	33	453	574
Grand Total for County	153	33	729	915

According to the FEMA-4447-OH Preliminary Assessment Report, 62.3% of the affected residents were insured, and 14.9% of the affected residents were poverty households. Presumably, the properties in Table 9 have not received insurance payments, were under insured or did not receive FEMA assistance since over six months after the disaster no improvements have been made. Based upon the HUD serious unmet need housing multiplier, the unmet serious housing need for the MID area is \$21,839,977 and \$34,845,571 for Montgomery County as shown in the table below.

Table 10: Calculated Unmet Housing Need as of January 2020

MC Auditor Rating	Destroyed	Inaccessible	Major	Grand Total
HUD Multiplier	\$38,965	\$38,965	\$37,804	
Grand Total for MID	88	33	453	574
MID Unmet Need	\$3,428,920	\$1,285,845	\$17,125,212	\$21,839,977
Grand Total for County	153	34	729	916
County Unmet Need	\$5,961,645	\$1,324,810	\$27,559,116	\$34,845,571

Estimated Unmet Housing Need
\$34,845,571

As of June 1, 2020, the MVLTRG reports the following disaster case management updates.

- 854 calls to *211; 493 have been 'closed' and 361 remain 'open' waiting assistance
- Household Characteristics of Open cases:
 - 43% have children under 18
 - 27% have members over age 60
 - 52% are homeowners; 44% renters and 4% other
- Top Requests for assistance include household appliances, repair/reconstruction, rental deposit and utility assistance, food assistance, and assistance with FEMA and other benefit access.
- 444 homeowners have applied for assistance
 - 68% indicated they need help with repair/rebuild
 - 52% of the 444 homeowners indicated they are insured. However, many "insured" survivors are encountering challenges that are impacting their ability to recover and will require MVLTRG assistance to repair/rebuild.
 - 34% are underinsured
 - 14% are uninsured

This map shows a database of locations compiled from the Case Management System (acquired in February 2020 and updated through April 21, 2020) and county sources (Greene, Miami, and Montgomery; acquired in 2019). The origin of the data for the county sources are typically the Auditor's Office and the county EMA office. All information is associated with damage wrought by the tornadoes of May 2019.

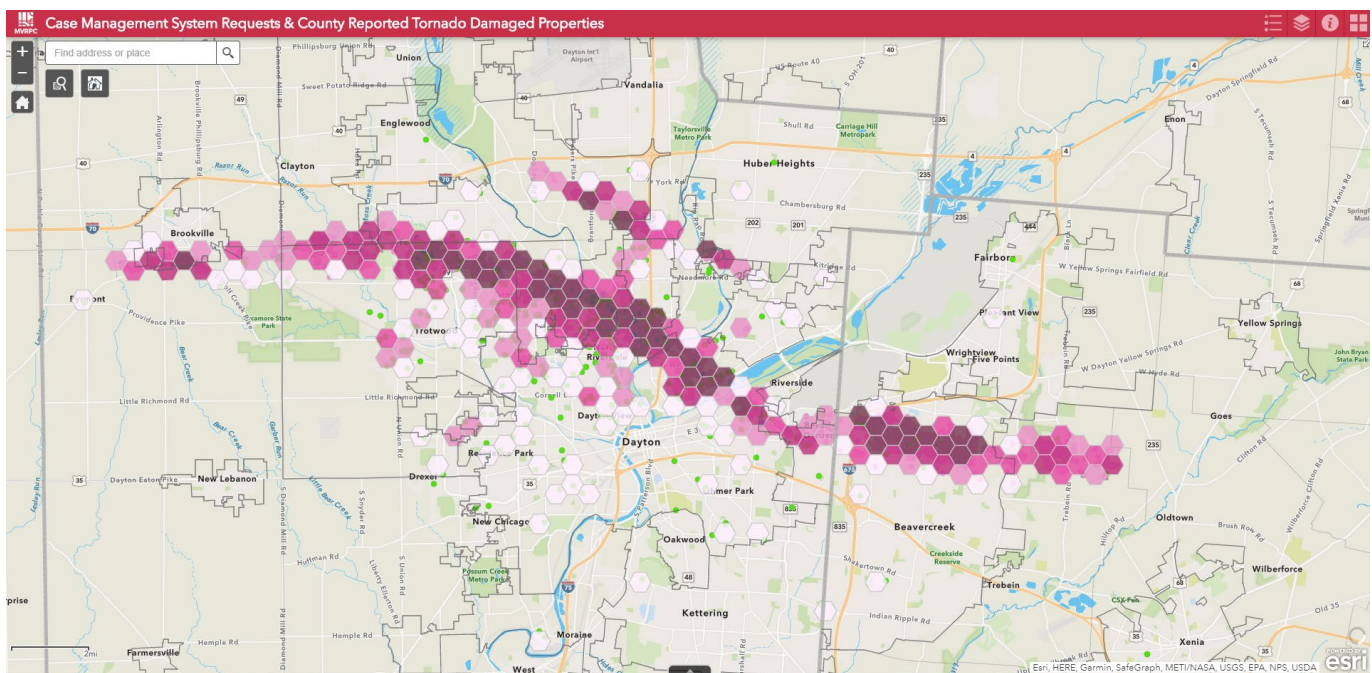


Figure 50: Case Management Dashboard map showing locations of with damage as result of tornadoes.

Prepared by [MVRPC](#), April 2020. App revision May 2020. The darkest pink dots are areas with properties with damage and are still in the case management system.

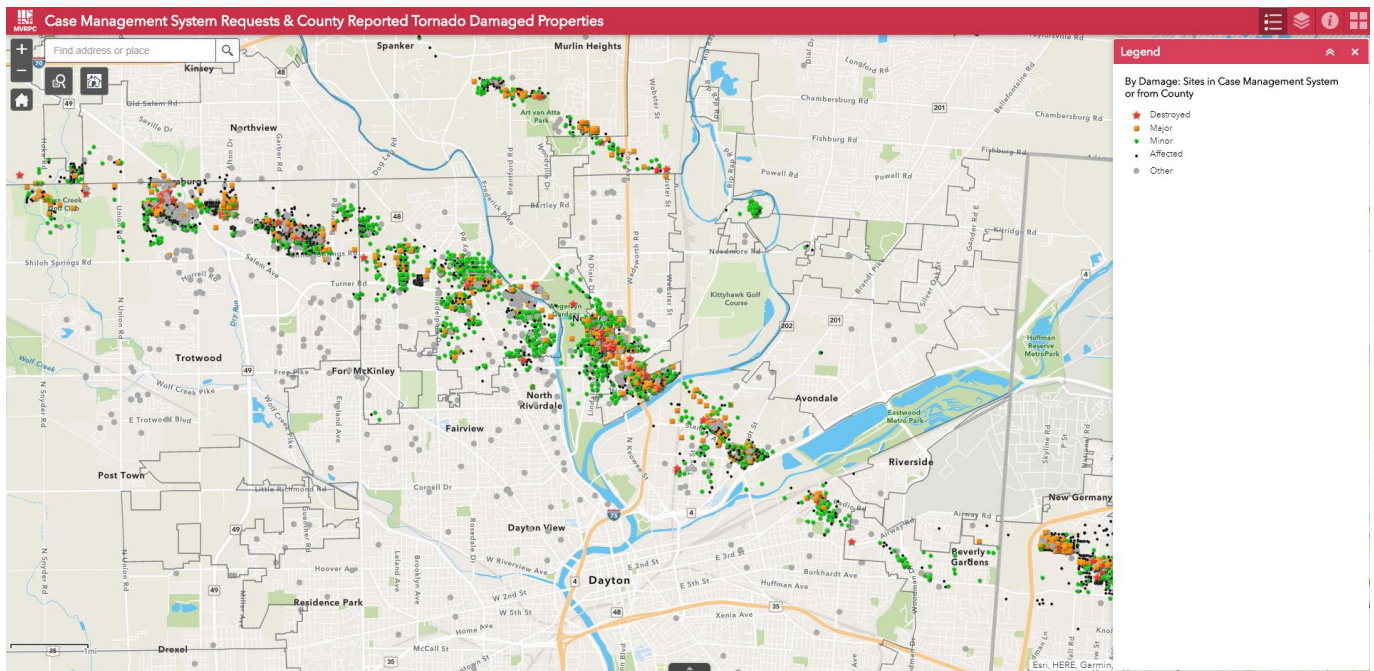


Figure 51: Case Management Dashboard Map showing damage by color

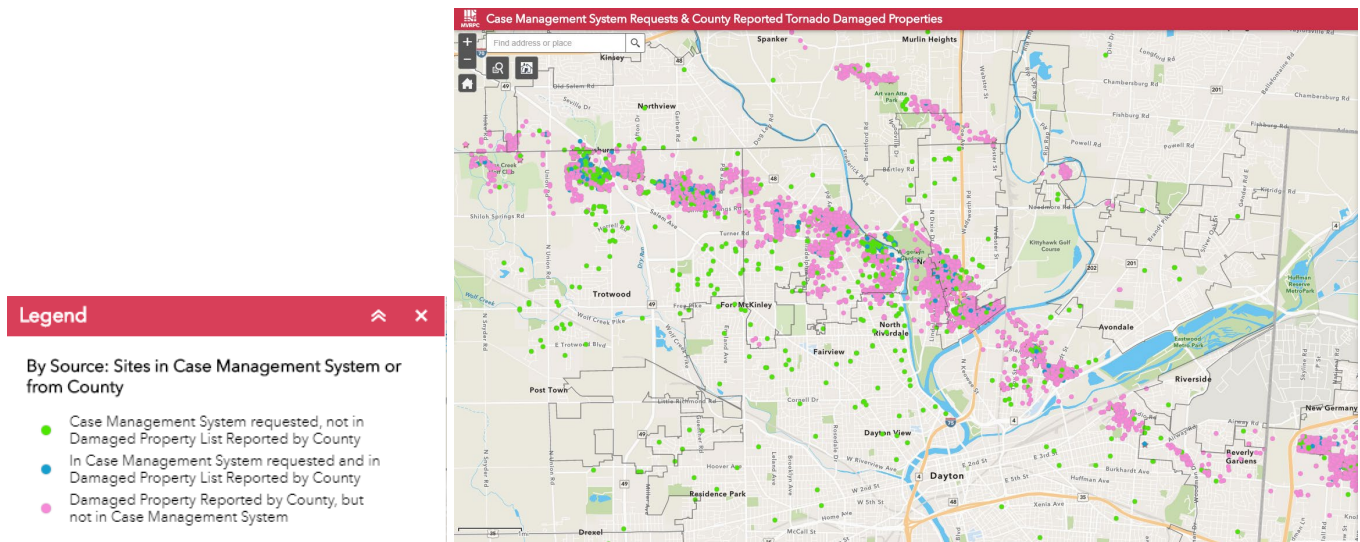


Figure 52: Case Management Dashboard Map showing damaged properties in or not in Case Management System

MVRPC hosts a recovery monitoring center for property and individual recovery at <https://experience.arcgis.com/experience/c416a08f3455438a8fde4cd6ad42a702/>. Data on recovery of the Miami Valley Region continues to be aggregated from multiple sources, including local jurisdictions and the MVLTRG. The dashboard mapping the Individual Recovery cases with updated data from case management is available at <https://mvrpc.maps.arcgis.com/apps/opsdashboard/index.html#/ebf27362236b4eee8555fb81f32cc72d>

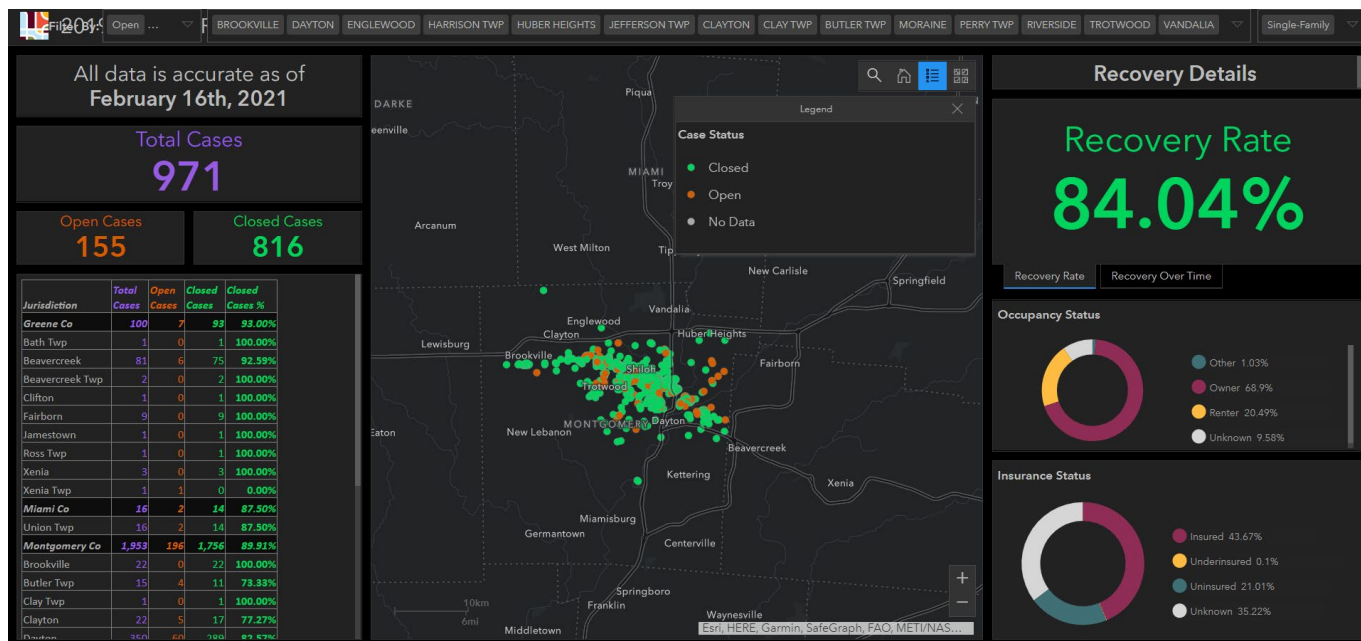


Figure 53: Case Management Dashboard showing MID County Recovery

As of February 2020, data from the Red Cross Coordinated Assistance Network (CAN), a tool used by all disaster case managers, show the unmet needs of individuals impacted by the tornadic events:

- 971 total cases in Montgomery County (MID County)
 - 757 closed
 - 129 open
- 42.05% renters/48.25% homeowners/1% other/8.68% unknown
 - 27.73% were insured,
 - 31.23% were uninsured,
 - 0.11% were underinsured, and
 - 40.92% unknown
- 244 cases multifamily, 29 non-residential, 528 single-family, 8 cases Subsidized (Section 8/HUD), 4 vacant/unknown
- Nearly 200 families needed assistance finding new options for affordable rental housing/shelter and/or subsidizing rental payments as a direct impact of the tornadoes. It is not atypical for families to have been displaced from their residence at the time of the tornadoes and continue to struggle to recover.
 - Some survivors quickly moved into substandard housing in their urgency to immediately find post-tornado shelter. These households subsequently relocated to escape dangerous and unsanitary conditions.
 - Due to the lack of affordable housing in the region - and exacerbated by the tornadoes' destruction of several large affordable housing complexes – many relocated to housing that was much more expensive than their previous residences and have been relying on short-term rental subsidies (FEMA and community organization support). This is unsustainable long-term.
 - Some survivors who were unable to find affordable housing in their home tornado-impacted communities temporarily relocated to other areas hoping to eventually return home.

Unmet Housing Needs of FHA Protected Groups

The unmet housing needs of protected groups under the Fair Housing Act (FHA), seniors and low-income vulnerable populations are further detailed below. The information in the table below is a result of the MVLTROG case management data.

Table 11: Montgomery County Disaster Case Management

Demographic Category	# Open Cases n=160 (Number and Percentage)		Total # Households N=1886 (Number and Percentage)	
Households with Children (<18)	24	15%	510	27%
Households with Seniors (60+)	70	44%	539	29%
Households with a Disabled household member	29	18%	227	12%
Ethnicity				
Hispanic or Latino	2	1%	40	2%
Not Hispanic or Latino	42	26%	1139	60%
Undetermined / Declined	124	78%	969	51%
Race				
American Indian or Alaska Native	0	0%	2	0%
Native Hawaiian or Pacific Islander	0	0%	2	0%
Black or African American	25	16%	894	47%
White	20	13%	276	15%
Undetermined / Declined	123	77%	948	50%
Income				
Annual Income Less than \$30,000*	19	12%	702	37%

According to U.S. Census Bureau's American Community Survey and Quick Facts data, adults 65 and older comprise 23% of Montgomery County's population. As a result, MVLTROG is serving a disproportionately high number of seniors. Furthermore, seniors have the highest number of open cases, indicating an unmet need. Montgomery County's population with a disabled household member is 14% and the City of Dayton's is 15%. Therefore, the case management data indicates that MVLTROG is serving a disproportionately high number of families with disabilities. Black or African American families make up 21% of Montgomery County's population and 38% of the City of Dayton's population. Data indicates MVLTROG is serving a disproportionately high number of Black families. The population living at or below 200% of the federal poverty level in Montgomery County is 36% and in Dayton, 31%. As a result, MVLTROG is serving a large number of families experiencing high poverty levels.

MVLTROG did not collect data related to families experiencing homelessness or public assistance, however the Homeless Solutions Policy Board recently published figures that showed that Montgomery County had 4,700 homeless individuals in 2018 and 48% of those were African American <https://www.mcoho.org/2019%20Annual%20Report.pdf>.

A disproportionately high number of seniors, persons with disabilities, Black or African American families, and low-income families had unmet housing needs as a result of the tornadoes. In terms of open cases,

this disproportionality is even more evident in seniors and those with disabilities – indicating that their cases are likely more complex and require more resources to resolve.

Business

According to summary data from the Disaster Recovery Walk in the MID area, 585 commercial properties were targeted, and 418 were touched by the tornadoes. Twenty-six percent of businesses did not have to close; however, 71% closed temporarily, and 3% remain closed. Only 20% of businesses were affected (ex. lost shingles), 24% experienced minor damage, and 11% major damage. The main type of businesses affected were services, retail, manufacturing, and restaurants. A total of 220 people were unemployed as a result of the damage. The total estimated financial impact encompassed costs associated with structural, foundations, inventory, products, equipment and assets, sales, revenue and other costs. In total, the financial impact exceeded \$8.6 million.

The Ohio Small Business Administration indicated no businesses applied for assistance. Many businesses had insurance to cover losses or the business was a total loss.

Table 12: HUD 2019 Disasters- Serious Unmet Business Needs (Data from 11-15-2019)

Grantee	Ohio	Disaster Type	Severe Storms/Tornadoes/ Flood/Wind/Landslides/ Mudslides
Disaster Number	4447	Multiplier for pre-inspection denial due to credit or income	1.97
Estimated Applicants with Serious Unmet Needs (Inspected and Uninspected)	45	Estimated Serious Unmet Business Needs	\$6,430,222
Applicants Inspected with serious damage and denied or still in processing	23	--	--

Estimated Unmet Business Need
\$0

Infrastructure

While some infrastructure sustained damages, local communities identified other sources to assist in addressing immediate damages. The City of Dayton applied for funding in December of 2019 for water pumps.

To calculate unmet needs for infrastructure projects, Development used data provided by the Governor's Office for the initial June 18, 2019 declaration showing the amount needed to repair the permanent public infrastructure (Categories C to G) to their pre-tornado condition.

Public assistance is provided to state, tribal, and local governments and certain private nonprofit organizations for emergency work and repairing or replacing disaster-damaged facilities, which may include the following Categories:

- A – Debris removal
- B – Emergency protective measures
- C – Roads and bridges
- D – Water control facilities
- E – Buildings and equipment
- F – Utilities
- G – Parks, recreational, and other facilities

Table 13: HUD 2019 Disasters-Infrastructure Need (Data from November 15, 2019)

Grantee	Ohio	Disaster Type	Severe Storms/Tornadoes/ Flood/Wind/Landslides/Mudslides
Disaster Number	4447	Federal Share Percent	75%

Category C to G FEMA PA Estimate	\$4,642,696
Federal Share	\$3,482,022
Local Share (Unmet Need)	\$1,160,674

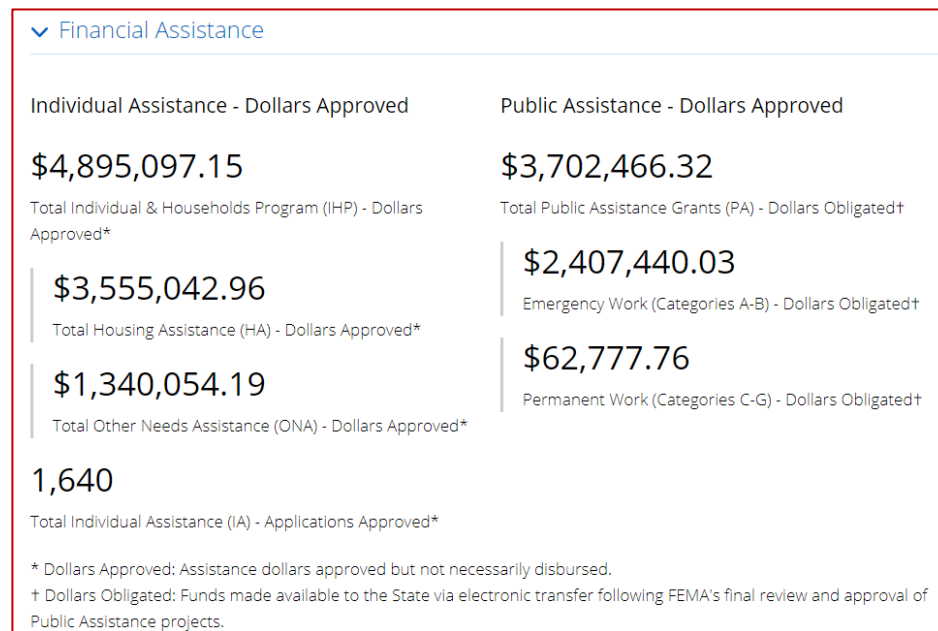


Figure 54: FEMA Financial Assistance Data (4-17-2020)

According to FEMA data (FEMA, 2020), only \$62,777.76 has been obligated by FEMA toward the \$4,642,696 estimated need in Categories C to G. However, \$2,407,440 has been obligated to assist with emergency work in Categories A and B. With the information available, Development will adopt HUD's \$1,160,674 estimate as the unmet infrastructure need.

As of June 1, 2020, OEMA public assistance has had 42 applicants. FEMA has awarded over \$7 million. They continue to process projects and request payments be sent to applicants as projects are awarded by FEMA.

As of February 2021, the City of Dayton provided the following figure of infrastructure recovery projects.

Overview of Recovery Projects & Sources

Project	Funding Source	Amount \$
Water Generator Project	US Economic Development Administration	3,600,000
Debris Removal from Right of Way (115,000 Cubic Yards)	Federal Emergency Management Agency	1,890,396
Reimbursement for Repairs to Ottawa Treatment Plant	Insurance	617,631
Reimbursement for Emergency Operations (Police, Fire, Water)	Federal Emergency Management Agency	397,417
Hazardous Tree Removal in Parks & Right of Way	Federal Emergency Management Agency	202,146
Ridgecrest Park Restoration	Federal Emergency Management Agency	24,568
Infrastructure Repairs	Federal Emergency Management Agency	42,872
Repairs to City Facilities***	Insurance, City of Dayton General Capital	114,620
Sub-Total Federal Emergency Management Agency		2,557,399
Sub-Total US Economic Development Administration		3,600,000
Sub-Total Insurance and General Capital		732,251
Grand Total Memorial Day Tornado Projects		6,889,650

*FEMA supported project amounts include the Ohio EMA contribution of 12.5%

***Chart includes proceeds paid-out as of 01-26-2020. The City has not begun the settle-up process for administrative, engineering and other expenses."

****Repairs at Wegerzyn site are completed but invoices have not been paid. Reflects total budget for facility repairs undertaken by insurance and capital."

Estimated Unmet Infrastructure Need
\$1,160,674

Part 3: Determining Capacity

According to HUD's *Guide for Review of Financial Management of CDBG-DR Grantees*, each grantee must submit Risk Analysis Documentation to demonstrate that it has proficient controls, procedures, and management capacity in place. This includes the grantee's ability to prevent duplication of benefits as defined by Section 312 of the Stafford Act. Additionally, the grantee must demonstrate it can effectively manage the funds, ensure timely fund expenditures, maintain a comprehensive website regarding all disaster recovery activities assisted with these funds, and ensure timely communication to applicants regarding application status for disaster recovery assistance. Finally, the grantee must demonstrate that it has adequate policies and procedures to detect and prevent fraud, waste and abuse.

Accountability

Development will act as the principal agency responsible for the award. Development is a cabinet-level agency whose Director reports to the Governor. Development's Office of Community Development (OCD) will implement the CDBG-DR award. OCD is the business unit that administers HUD's grant programs for the state, including the Community Development Block Grant, HOME Investment Partnership, Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS Programs and the National Housing Trust Fund. In Program Year 2019, OCD administered a total of over 81 million dollars in HUD-granted funds. Recently, the State of Ohio received \$130.7 million in CARES Act funding to address the COVID-19 pandemic.

Preliminary Program Design

The OCD is developing a Method of Distribution (MOD) based action plan for this grant that will focus primarily on the affordable rental housing shortage in the City of Trotwood, Harrison Township, and the Wright View, DeWeese Ridgecrest, and Old North Dayton neighborhoods in Dayton, the areas most impacted areas by the storms. The Ohio Housing Finance Agency (OHFA), a state agency and long-time affordable rental housing development partner will be partnering on implementing the program and acting as a subgrantee.

In addition, OCD may allocate a portion of the CDBG-DR for single-family home repair and rehabilitation resulting from the tornadoes. The activity scope will be countywide with the scale to be determined based upon local recovery success and repair efforts currently in progress. Montgomery County would act as the subgrantee for this activity and partner with the local MVLTRG for implementation.

Application Process

Upon executing the CDBG-DR grant agreement with HUD, Development will directly grant funds to OHFA, the state's housing finance agency, and Montgomery County, the MID county.

OCD will utilize its existing online grants management system, OCEAN, for subgrantees to manage their grant funding and submit project data for reporting and submit draw requests. OCEAN provides 24/7 access to application status in addition to email notifications when an application status changes. When OCD awards funding, it will inform the applicant via email.

As a MOD implementation, OCD's application will not include submitting individual applicant information. All data requested and submitted will be aggregate community-level data. The Residential Revitalization

Manager will have overall responsibility for managing the application process with support from the Grants Operation Manager, Deputy Chief, and staff.

OHFA will utilize their online system to accept proposals for multifamily projects.

Montgomery County will continue to utilize the Red Cross CAN system for single family individual recovery application/case management.

Capacity Assessment and Technical Assistance

On an annual basis, OCD administers up to \$80 million in HUD funding through various programs, primarily in housing. OCD-administered HUD programs are generally considered to be run effectively and efficiently, meeting all requirements for timeliness of commitments and expenditure ratios. There are no outstanding monitoring findings and HUD generally considers Ohio a low-risk grantee. OCD also has a history of successfully integrating supplemental or new funding sources into its portfolio without decreasing performance as evidenced by implementing the three Neighborhood Stabilization Program grants as well as the seamlessly integrating National Housing Trust Fund dollars.

The MOD OCD is currently developing for the CDBG-DR implementation will utilize the existing Housing Development Assistance Program for multi-family development in partnership with OHFA. Utilizing the existing program structure and associated systems will minimize the impact of the influx of funds and enable the state to efficiently deploy resources. OHFA is fully committed to providing the necessary resources to implement the program as a subgrantee. In addition, OCD has multiple existing programs that focus on single-family home repair and rehabilitation and will be able to quickly create a program to address storm damage-related home repair and rehabilitation in partnership with Montgomery County. OCD staff will be fully engaged in HUD CDBG-DR training opportunities including participating in the August CDBG-DR workshop in Chicago, attending DRGR training when available, and attending any additional related trainings when applicable. Staff is also experienced in interpreting and applying requirements as outlined in Federal Register Notices and HUD policies and guidance. As the program moves from planning to implementation, OCD will identify areas of opportunity to engage HUD technical assistance providers to address unique challenges that arise.

Staffing Assessment

OCD's staffing model will be flexible to accommodate the needs associated with program development. As the programs launch, OCD will make the appropriate adjustments to accommodate the workload. The agency organizational chart, Figure 56, provides a visual representation of the various functions associated with the program activities undertaken with the CDBG-DR funds. Key staff members have prior experience with the HUD-funded CDBG annual program.

Case management

Case management will be limited to implementing the home repair/rehabilitation program. This will be managed by the subgrantee and OCD will evaluate the case management plan assessment and evaluation during program application review. Based upon the region's current recovery efforts, case management will likely be coordinated with the MVLTRG, which currently manages overall case management in the region. OCD will provide funding for training and technical assistance to the grantee and case management providers.

Program management (In-Place)

Overall responsibility of the CDBG-DR grant is with OCD's Deputy Chief. The Residential Revitalization Manager will supervise program implementation. The Residential Revitalization Manager is the program manager for OCD-administered HUD housing programs and as the CDBG-DR award is primarily focused on housing, it is appropriate that the Residential Revitalization Manager is the lead. The Residential Revitalization Manager will be supported by the Community Investments Manager in areas where recovery efforts include economic revitalization and infrastructure development. The Community Investments Manager is the program manager for OCD's economic development and infrastructure programs funded through HUD.

Staffing (3 In-Place, 2 hire)

As this will be primarily a housing program, OCD is dedicating an existing Residential Revitalization Specialist to support the program up to full-time depending on need. OCD is in the process of hiring an additional Residential Revitalization Specialist position to back-fill for the position that will support the CDBG-DR implementation. Additionally, existing Residential Revitalization and Community Investments staff will be available to support the CDBG-DR implementation as needed.

Procurement/Contract Management (In-Place)

The OCD Training and Technical Assistance Manager is responsible for developing and implementing the Procurement Policy for all OCD-administered HUD programs, including the CDBG-DR allocation.



Environmental Compliance (In-Place)

The OCD Training and Technical Assistance Manager, assisted by the Environmental Compliance Specialist, is responsible for environmental compliance for all OCD-administered HUD programs, including the CDBG-DR allocation.

Section 3 and FHEO (In-Place)

The OCD Training and Technical Assistance Manager, assisted by the Compliance Specialist, is responsible for Section 3 reporting and fair housing compliance for all OCD-administered HUD programs, including the CDBG-DR allocation.

Monitoring

OCD anticipates two subgrantees for the CDBG-DR and will monitor those two grants with a combination of staff identified in sections described above.

Financial Management (In-Place)

Three primary business units will implement the financial components of the CDBG-DR grant. The Accounting Manager and staff will manage overall accounting and cash management. Development's Budget Officer, who reports to Development's Chief Financial Officer, will manage budgets within the OAKS state accounting system, verify vouchers, and manage administrative funds. All other grant-level financial management including grantee request for payments, financial status reporting, and DRGR will be managed by OCD's Grant Operations Manager and staff.

Independent Audit Staff (In-Place)

Development's Audit Office includes six auditors in addition to the Special Project Coordinator and Audit Executive. The Audit Executive reports Development's Chief Financial Officer and Chief of Staff to the Agency Director. Existing audit resources will be sufficient to provide internal audit oversight for the two subgrantees.

Internal and Interagency Coordination

Interagency Communication

OCD has systems and processes in place to ensure effective communication between different departments and the division implementing CDBG-DR activities. Currently, OCD manages over \$80 million annually in HUD programs for the state. OCD managers meet weekly to discuss all programs in the OCD portfolio.

Communication between OCD and Subgrantees

OCD met with local officials and representatives from the Miami Valley Long Term Disaster Recovery Board to ensure planning is consistent with local and regional planning efforts. OCD anticipates two CDBG-DR Program subgrantees. Typically, OCD subrecipients are required to report every six months. However, since CDBG-DR is a new program, OCD staff will communicate regularly with subrecipients to assess progress and provide technical assistance.

Part 4: Prioritizing Needs

Prior to the Memorial Day tornadoes, affordable housing was a major need for Montgomery County. While businesses and infrastructure were impacted, housing had the largest impact and remains the primary need.

The estimated impact from the tornado is a combined \$142,519,483 across the housing, economy, and infrastructure sectors. The figure is calculated on best available data and may be adjusted as additional data becomes available. After considering funds already available through insurance payments and state and federal assistance, the remaining overall unmet need is approximately \$36,006,245 for all three categories. The \$12,305,000 federal allocation allow the state to address approximately 34% of the overall unmet need.

Table 14: Total Storm Impact

HUD Category	Estimated Impact		Unmet Need		Grand Total
Housing	\$126,869,347	89.0%	\$34,845,571	96.8%	\$161,714,918
Business	\$8,600,000	6.0%	\$ -	0.0%	\$8,600,000
Infrastructure	\$7,050,136	4.9%	\$1,160,674	3.2%	\$8,210,810
Total	\$142,519,483	100.0%	\$36,006,245	100.0%	\$178,525,728

When examining the relative need by sector, housing represents the greatest need with \$34,845,571 (96.8% of total) in unmet need, followed by infrastructure with \$1,160,674 (3.2% of total) in unmet need. The economic sector did not have any unmet needs.

Federal Register notice 83 FR 40314 allows grantees to propose a funding allocation that includes unmet economic revitalization and infrastructure needs that are unrelated to unmet housing needs after the grantee demonstrates in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other funding sources. At this time, it is evident there is a significant unmet housing need, and the primary focus will be to address the unmet housing needs with this CDBG-DR funding.

Despite Montgomery County being declared eligible for FEMA Individual Assistance, many people were left with their housing needs unmet. This section will detail the priorities for funding allocation and explain the justifications for creating the programs to assist those in need.

Development seeks to assist those with unmet housing needs by offering a Multifamily Rental Program, a Homeowner Rehabilitation and Repair Program, and a Homebuyer Program. These programs will be discussed in detail in Part 5, Method of Distribution.

Priorities for Funding Allocation

HUD provided the state with \$12.305 million in disaster recovery funds to assist in recovery efforts and addressing unmet needs from the 2019 Memorial Day tornadoes. The state will use CDBG-DR funds for necessary expenses related to long-term recovery, restoration, and revitalization within the impacted and distressed areas as declared in DR-4447. To prioritize funding in areas with the highest damage, HUD identified one ZIP code as the “most impacted and distressed” (MID) area and required that at least 80% of the state’s allocation must address unmet needs within ZIP code 45426, the City of Trotwood; however, that may be expanded to include the rest of Montgomery County. The remaining 20% of

CDBG-DR funding will also be allocated to Montgomery County, the MID area, to further assist recovery efforts.

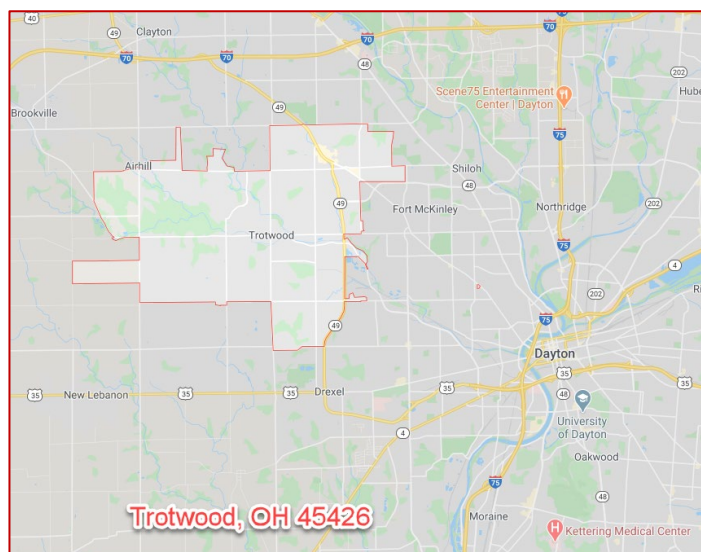


Figure 57: MID Zip Code- 45426

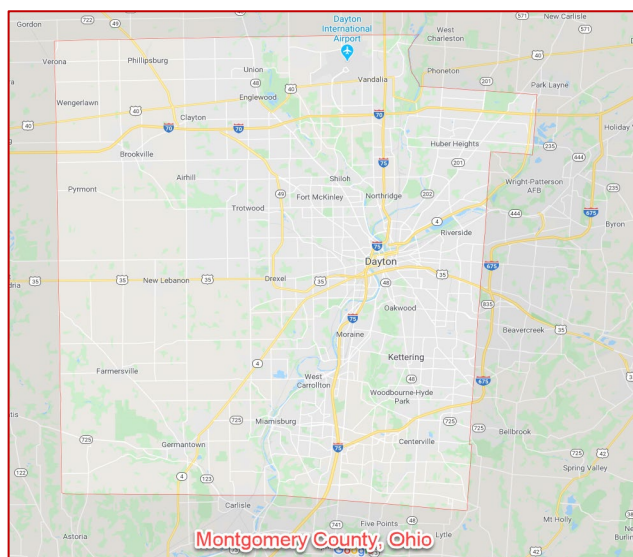


Figure 58: County-wide Service Area

Federal Register notice 83 FR 40314 allows grantees to propose allocating funds to address unmet economic revitalization and infrastructure needs unrelated to unmet housing needs. The grantee must demonstrate in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other funding sources. Due to the significant unmet housing need, the state will use CDBG-DR funding to help create affordable housing.

OHFA will implement the multifamily rental program. OHFA will incorporate the CDBG-DR funds into its existing Housing Development Assistance Program (HDAP). The program provides grants and loans for the development and preservation of affordable housing statewide. Awarded as soft funding, HDAP resources enable affordable housing developers and owners to serve households at or below 50% of Area Median Income (AMI). OHFA awards HDAP funds on a competitive basis through three funding programs based on other financing developers and owners are working to secure - competitive 9% housing tax credits, non-competitive 4% housing tax credits, or HDAP only. From funding execution to project completion, HDAP projects are completed in less than four years. Therefore, this model allows the state to complete the most housing units with the funds available.

The Montgomery County Economic and Community Development (MCECD) office will partner with the MVLTRG to implement the Single-Family Homeowner Program. MCECD is a HUD Entitlement and Participating Jurisdiction currently managing HUD funding. As a result of MVLTRG's case management 18 months after the disaster, MVLTRG has identified *Pathways to Homeownership* as a community need to provide an opportunity for residents to find housing. Renters who were impacted by the disaster had received counseling through case management process and are eligible to become homeowners. However, due to the massive housing shortage, affordable single-family homes are not readily available. The MVLTRG is collaborating with local organizations, land banks and jurisdictions to acquire properties to build new homes or rehabilitate existing homes for potential homebuyers. Upon construction completion, the nonprofit will sell the home to one of the tornado-impacted renter households ready for homeownership.

As of February 2021, MVLTROG identified 37 vacant lots and five properties for rehabilitation. Currently MVLTROG has 16 tornado-impacted renter household who are eligible to purchase a home; eight (50%) of those households have children in the home, 14 (88%) of the families are African American, and two applicants (13%) have a household member with a disability. One household is a veteran with disabilities. Most of these applicants are currently spending 36-40% of their household income on rent. Current rents range from \$550 to \$1,200. Three projects utilizing other funding are underway, with the first being new construction.



Figure 59: CAD drawing of one of first three Pathways to Homeownership Project

According to the MVLTROG, as of February 2021, there are 2,051 total cases in Miami Valley since the disaster. Of that number, 1,874 are closed, leaving 177 still open. 129 of the 177 are in the MID. 84 of the open cases are homeowners who have requested repair/reconstruction assistance. Currently, 45 active repair/rebuild projects are underway with MVLTROG funding. 18 additional projects are being assessed for repair/rebuild. The remaining 30 cases are open due to more complex issues like legal action and households the compounding impact of the COVID-19 pandemic.



Figures 60-65: A recent MVLTRQG rebuild project completed



Figures 66-67: MVLTROG repair project completed with Habitat for Humanity

Data on recovery of the Miami Valley Region continues to be aggregated and available on the recovery monitoring center for property and individual recovery at

<https://experience.arcgis.com/experience/c416a08f3455438a8fde4cd6ad42a702/>.

Ohio established these funding priorities as the most impactful in meeting the unmet housing needs, especially for vulnerable populations. The MVLTROG determined needs through the disaster recovery case management system. Of those with open cases in the case management system, a high number of those cases still needing assistance are seniors and households with disabilities. The Housing Development Assistance Program will develop affordable housing opportunities to help replace affordable and naturally affordable housing destroyed by the tornadoes. The high limits and flexibility of the rehabilitation and repair programs will help to assistance in these more complex cases. The Pathways to Homeownership program is an opportunity for renters, most of whom are identified as vulnerable populations, to become homeowners. Concentrating recovery efforts to the MID will help a disproportionately high number of low- to moderate-income populations access affordable housing.

Part 5: Method of Distribution

The Method of Distribution is tasked with allocating resources based upon multiple layers of need and prioritization. As mentioned in Part 4, OCD will expend all CDBG-DR funds in the most impacted and distressed (MID) county, as Ohio only had one MID ZIP code. Due to the extent of the damage, OCD prioritized housing programs over infrastructure and economic programs. OCD will allocate the funds to the following programs: Housing Development Assistance Program (HDAP) – Multifamily Rental Program (85%), Single-Family Homeowner Programs (9.3%), planning (0.7%), and administration (5%).

Program Budget

OCD anticipates Montgomery County's unmet housing needs for its most vulnerable citizens will exceed the available funding and since the Federal Register Notice requires unmet housing needs be served first, Ohio will allocate all program dollars for housing recovery activities and administrative activities. The program budget is outlined in the table below.

Table 15: CDBG-DR Program Budget (\$12,305,000)

Housing Program	Allocation	% of Allocation	Amount serving LMI	LMI %	National Objective
Multi-Family Rental Program Housing Development Assistance Program	\$10,450,000	84.9%	\$7,315,000	70%	LMI
Single Family Homeowner Programs - Housing Rehabilitation - New Construction (Reconstruction) - Homeownership Assistance	\$1,150,000	9.3%	\$1,150,000	100%	LMI
Planning	\$90,000	0.7%			
Administration	\$615,000	5.0%			
State Administration	\$246,000	2.0%			
Subgrantee Administration	\$369,000	3.0%			
Total Planning and Administration	\$705,000	5.7%			
Grand Total	\$12,305,000	100.0%	\$8,533,750		

Rationale for Distribution of Funding

Multi- and single-family housing seem to have been closely impacted by the number of affected properties identified in the Montgomery County Auditor's assessment of damaged properties. The state's goal is to provide the community with the most affordable housing units possible with its CDBG-DR funds. Focusing on multi-family units would allow the state to maximize the number of affordable housing units available to the community and help restore a portion of the large number of naturally affordable housing units impacted by the disaster.

Additionally, due to the quick response for single-family case management, MVRPC estimates only 10% of cases remain open and need additional funding. See the MVRPC Tornado Recovery Dashboard at <https://experience.arcgis.com/experience/c416a08f3455438a8fde4cd6ad42a702/>.

As noted in the Montgomery County Damage Table (tables 6-9) apartments made up 46% of the properties damaged and almost 85% of the properties destroyed. Data from the Montgomery County Auditor shows that 2,633 affordable and subsidized housing units were damaged or destroyed. As a result of this decrease in available and affordable units, rental housing costs increased. Trotwood and Harrison Township were hit hardest, with median household income already 30% less than the county's median household income. Additionally, approximately half of Trotwood's residents reside in rental housing units. Based on this information and the remaining unmet needs identified in the plan, the state prioritizes constructing new rental housing units with its CDBG-DR funds.

CDBG-DR Program National Objectives

Development designed the CDBG-DR program in compliance with Housing and Community Development Act national objectives and will ensure that communities prioritize the most disadvantaged populations. Development will ensure, as is required in the Federal Register, that at least 70% of the aggregate of CDBG-DR program funds are used to support activities benefitting low- and moderate-income (LMI) persons. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI) in the county where the applicant lives. While slum and blight clearance and addressing urgent needs are also national objectives under CDBG, the state will not utilize those options.

As a federal CDBG funds steward, Ohio complies with HUD's mission to develop viable communities by the provision of decent housing, a suitable living environment and expanding economic opportunities. To this end, all funded activities the state administers will meet Housing and Community Development Act national objectives to benefit LMI persons. The LMI benefit national objective housing category qualifies activities undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households.

Multi-family Rental Program (Housing Development Assistance Program:

- National Objective: Low- and moderate-income benefit
- At least 51% of affordable multifamily units using CDBG-DR funds will be reserved for individuals at or below 80% of AMI. Subrecipients will adhere to the most current HUD Income Limits at the time of application for Montgomery County, Ohio (the Dayton Metropolitan Service Area).

Single Family Homeowner Programs:

- National Objective: Low- and moderate-income benefit
- All program funds will meet a low- and moderate-income national objective. Households with income higher than 80% of AMI will not be eligible for this program. Applicants will declare their income on the intake application and case managers will verify the income.
- Subrecipients will adhere to the most current HUD Income Limits at the time of application for Montgomery County, Ohio (the Dayton Metropolitan Service Area).

Funding assistance and workforce development support remain available from existing state, regional and local programs. There is no anticipated need for urgent additional disaster recovery funding at this time.

Duplication of Benefits

In accordance with the Robert T. Stafford Act, as amended, Development will implement policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to

recover from 2019 Presidentially Declared Disasters. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss for which the person has received financial assistance under any other program, from private insurance, charitable assistance or any other source. To prevent duplication of benefits, Development will require that all sources (federal, state, local, private and charitable) and amounts of disaster assistance received or reasonably anticipated are documented with application submission for CDBG-DR funding. Development, Ohio Housing Finance Agency and Montgomery County will monitor and review information provided to determine what, if any, duplication may occur. Applicant awardees must subrogate any additional funds received for damage caused by the presidentially declared disasters back to Development.

Public Services

Due to the overwhelming unmet housing need, Development will implement programs to serve those needs. Montgomery County will utilize the MVLTDRC individual recovery continuum of care to provide legal services to individual applicants. Consideration will also be made for citizens with communication limitations, disabilities, those in need of mental health services, and general health services and translation services as the need arises.

Eligible Activities

- Multifamily Rental New Construction and Rehabilitation:
 - Housing Development Assistance Program: This activity is addressed in the B.34 “Addressing Unmet Affordable Rental Housing Needs” section in the February 9, 2018 Federal Register Notice (83 FR 5844).
- Single Family Homeowner Program:
 - Housing Rehabilitation/Repair: Section 105(a)(4) of the HCD Act is for Housing Rehab and is also clarified in the February 9, 2018 Federal Register Notice (83 FR 5844) under the “Clarification of disaster-related activities” “housing” section.
 - New Construction: This activity is address in the B.32 of section VI of February 9, 2018 Federal Register Notice 83 FR 5844
 - Homebuyer Assistance: **24 CFR** 570.201(n)

Planning

The State of Ohio Hazard Mitigation Plan (SOHMP) contains information on natural hazards that could impact Ohio and the state's blueprint for reducing risk posed by those hazards. The highest priority hazards in Ohio include riverine flooding, tornadoes, winter storms, landslides, dam/levee failure, wildfire, coastal flooding/seiche, earthquakes, coastal erosion, drought, severe summer storms, invasive species, and land subsidence. The plan identifies actions that the state will undertake to help protect people and property from natural hazards and their effects. The current (2019) State of Ohio Hazard Mitigation Plan is available at: https://www.ema.ohio.gov/mip/planning_sohmp.aspx. The state's plan has an objective to prioritize acquiring properties, including those in high-risk areas (floodways) or those in imminent danger (e.g., landslide) for available funds from FEMA mitigation programs. Because Montgomery County does not have coastal boundaries, the state does not have to plan for storm surges. Furthermore, one of the state plan's objectives is to promote wind mitigation techniques and programs by continuing to implement and improve the Ohio Safe Room Rebate Program.

The MID area is covered by the Montgomery County Natural Hazard Mitigation Plan that was revised in 2020 and is available at <https://services.dps.ohio.gov/MIP/PublicSite/LocalPlan/GetDocument?fileUploadID=4184&filename=2019%20Montgomery%20County%20Natural%20Hazard%20Mitigation%20Plan%2C%20Revised%202020.pdf>. The pre-mitigation planning team focused on short- and long-term projects to lessen future events. Activities in the plan encouraged jurisdictions to enforce or enhance building, zoning, and planning codes and/or code enforcement. The plan's strategies and objectives encourage all governments, the public, and the building and construction industries to utilize construction methods that make new and existing structures safer or resistant to damage typically caused by natural hazards, including encouraging the use of wind and impact resistant building components designed to withstand tornado strength winds. Ohio Residential Building Code requires roofing materials have a wind design speed rating of at least 115 mph.

CDBG-DR planning funds will be utilized directly for the CDBG-DR necessary planning, including the Action Plan and Program Policies/Program Design to benefit the MID. All CDBG-DR funding will be spent in the MID area. Programs will incorporate appropriate mitigation and resilience measures and floodplain management opportunities as necessary. The programs will promote sound, sustainable long-term recovery planning supported by evaluating post-disaster hazard risk, especially construction standards and land-use decisions that reflect responsible floodplain and wetland management as necessary and coordinate with other local and regional planning efforts to ensure consistency. While this may increase initial costs, it will protect the community against future hazards. Multi-family site selection and development scope will support increased standards for green building and energy efficiency, wind, flood and a more resilient power and water supply.

The State of Ohio did not use CDBG-DR funds were not utilized to develop the statewide or MID area Hazard Mitigation Plans. Both plans were completed before HUD allocated the state its CDBG-DR funding. The state will use less than 1% of its CDBG-DR allocation to complete a CDBG-DR unmet needs assessment for the CDBG-DR Action Plan.

Activity Design: Multi-family Rental Program

Housing Development Assistance Program (HDAP)

National Objective/ Eligible Activity Regulations	Benefit to low- and moderate-income persons 24 CFR 570.483
CDBG-DR Allocation	\$10,450,000
Projected Accomplishments	The state estimates it will be able to assist up to 300 low- and moderate-income households with affordable rental units.
Proposed Start Date	2021
Proposed End Date	2025
Maximum Award	\$3,000,000
Affordability Period	30-years

Goal: The goal of the Housing Development Assistance Program (HDAP) is to provide financing for eligible housing developments to expand the decent, safe, affordable housing supply for very low-to-moderate income persons and households in the state of Ohio. Development utilizes a subrecipient agreement with OHFA to administer their funding for multi-family rental development through the HDAP. This funding includes HOME Investments Partnerships Program, Ohio Housing Trust Fund, and National

Housing Trust Fund dollars. CDBG-DR funds will be incorporated into the HDAP and administered in a similar fashion to other HDAP funding sources. HDAP, with additional CDBG-DR funds, will facilitate creating and rehabilitating quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by the storms.

For more than 30 years, OHFA has served as the state's affordable housing leader. The Agency relies on its partnerships with the private, nonprofit and public sectors to serve homebuyers, renters and populations with special housing needs. By partnering with OHFA to administer the CDBG-DR funds for multifamily rental housing development, Ohio will be able to maximize the impact of its CDBG-DR dollars by leveraging other housing resources to produce a greater number of units. The agency partners with experienced developers who are familiar with the requirements involved in federal funding. Incorporating CDBG-DR funding into its existing program structure will ensure the state deploys funds quickly.

Eligible activities will include constructing new rental housing units in areas impacted by the Memorial Day 2019 tornadoes, as well as rehabilitating rental developments damaged by the tornadoes. All CDBG-DR funding will serve as gap financing in developments predominantly serving low- to moderate-income households with incomes at or below 80% of the area median income.

In an effort to make the greatest impact and achieve maximize leveraging existing resources and developer experience, CDBG-DR funds will be utilized in projects also use Low-Income Housing Tax Credits (LIHTC). Specifically, OHFA will award CDBG-DR funds to eligible developments through the Bond Gap Financing (BGF) program, one of the existing HDAP programs used to fund multi-family rental projects. The BGF program provides gap financing to developments using multi-family bonds with non-competitive (4%) HTC's to renovate or construct affordable housing serving low- and moderate-income households. If coupled with LIHTC, OHFA estimates it will be able to fund at least five developments totaling 300 affordable units with the CDBG-DR funds.

This program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the tornadoes. Providing safe, disaster resistant housing for residents impacted by the 2019 tornadoes is critical to the long-term recovery strategies of the eligible areas.

- I. **Eligible HDAP Developer Applicants:** Applicants for HDAP projects can be private for-profit, nonprofit developers/owners, or public housing authorities (PHAs).

Applying for HDAP funds - including CDBG-DR - is a competitive process based on the funding considerations and priorities outlined in **VIII. Application Review Criteria and Process**. OHFA places a high level of importance on the development team's experience and capacity. As the development will also include LIHTC as a funding source, applicants must meet all applicable experience and capacity requirements outlined in the OHFA Qualified Allocation Plan (QAP). Applicants will be evaluated to determine if they have the ability to undertake the project, which may include, but is not limited to, prior development experience, readiness to proceed, concurrent developments underway, and experience with federal funding sources.

Because of the competitive nature of the program, no specific applicant will be given priority for HDAP funds. OHFA considered prioritizing PHAs, specifically Greater Dayton Premier Management (GDPM), the agency instead opted to follow its current HDAP guidelines and award funding based on the proposed development's project details and how well it meets the needs identified and maximizes the limited resources available. While OHFA does not provide priority to PHAs directly, competitive points and set-asides for projects going through a Rental Assistance Demonstration

(RAD) conversion as well as those preserving higher percentages of project-based rental subsidy are included in all of OHFA's competitive funding rounds (tax credits and HDAP).

- II. Projects per Developer:** Developers may submit more than one proposed development per year based upon the organization's capacity to implement multiple and/or simultaneous projects. OHFA reserves the right to require further information and to decide on an organization's capacity to complete multiple developments, which will include status and progress on projects using any resources provided by OHFA. OHFA may also limit the amount of total HDAP funds awarded to any single developer. OHFA reserves the right to combine the costs for developments located near each other and share similar attributes such as project type, construction style, and development team.
- III. Eligible Activities:** Eligible activities will include constructing and rehabilitating tornado-damaged rental housing in Montgomery County and the City of Dayton, with specific focus on ZIP Code 45426 (the hardest hit area). Developments must have a minimum of 30 units. HDAP funds may be applied in the development budget toward non-related party acquisition, hard costs associated with construction, and developer fees associated with the project.

Similar to other HDAP funding sources (such as National Housing Trust Fund), if the CDBG-DR funds are utilized by a PHA, the funds may only be used in the following circumstances:

1. New construction of public [housing](#) as part of the HUD Choice [Neighborhoods](#) program;
2. New public housing units that have been allocated and will receive low-income housing tax credits under section 42 of the Internal Revenue Code of 1986; or
3. Rehabilitation of existing public [housing](#) units in which the public [housing](#) assistance will be converted and used at the properties under the HUD Rental Assistance Demonstration (RAD) program.

Mixed-income and mixed-use projects are eligible, but the HDAP funds may only be applied to the affordable residential portion of the overall project.

- IV. Funding Limits:** The maximum award amount per project is \$3 million. Award amounts will be based on funding availability, construction type (new vs. rehabilitation), project needs, and number of units. Projects proposing new construction and projects proposing a higher number of affordable units will be eligible for a higher award amount as outlined below.

Construction Type	Number of Affordable Units	CDBG-DR Amount
<i>New Construction</i>	30-39	Up to \$1,500,000
	40-49	Up to \$2,000,000
	50-59	Up to \$2,500,000
	60+	Up to \$3,000,000
<i>Rehabilitation</i>	30-39	Up to \$500,000
	40-49	Up to \$750,000
	50-59	Up to \$1,000,000
	60+	Up to \$1,250,000

At the discretion of OHFA, award amount may exceed \$3,000,000 based on availability of funding and project need.

V. Affordability Requirements:

Affordability period: The required length of the affordability period is 30 years for both new construction and rehabilitation projects. OHFA has decided to exceed the minimum affordability limits as set in 83 FR 40314, aligning the affordability period with the LIHTC affordability period. This will allow for efficiencies in compliance monitoring for both the project owner and OHFA. The affordability period will be enforced through a restrictive covenant on the property. Compliance monitoring will be administered by OHFA and projects will be subject to the compliance monitoring schedule and requirements of the LIHTC program.

Affordable rents: OHFA defines affordable as affordable to and occupied by households at or below 80% of the area median income (AMI). At least 51% of the units in each development funded with CBDG-DR will be required to be affordable to and occupied by households at or below 80% AMI for during the affordability period. Priority may be given to those developments offering a higher percentage of affordable units or targeting a lower AMI.

OHFA will use the HTC rents as the standard for determining affordable rents. Additionally, if the unit receives federal or state project-based rental subsidy, the maximum rent is the rent allowable under that rental subsidy program as long as the tenant pays no more than 30% of his or her adjusted income.

VI. Financing Structure: Awarded funds will be structured as a cash flow loan, similar to the other HDAP funding sources. Terms will be as follows:

- 2% interest charged unless otherwise agreed to by OHFA.
- Loan matures at the end of the affordability period.
- Collateral will be a subordinate mortgage. OHFA must be in second or shared-second lien position unless otherwise agreed to by OHFA based upon good cause and sufficient supporting documentation.
- Payments will be based on a percentage of the cash flow as defined by OHFA. If loan payments flow from a third party to the HDAP recipient, they will be excluded from cash flow analysis provided they are transferred to OHFA in full. Any remaining balance on the loan will be due as a balloon payment at the end of the term or upon sale, whichever is first. On a case-by-case basis, OHFA may agree to subordinate to other government investors and accept payments consistent with their terms.
- Loan interest will accrue and repayment obligations will start following project closeout, regardless of the Placed-in-Service date. Closeout means the HDAP recipient leased the affordable units, provided the appropriate documentation to OHFA, and OHFA approved the documentation as evidenced by a closeout letter from the OHFA Housing Grant Analyst.

OHFA reserves the right to allow for forgiveness of all or a portion of the outstanding debt if, at the end of the 30-year loan period, OHFA determines that the property has been maintained as a safe, decent, and sanitary affordable housing project, as defined by the Uniform Physical Condition Standards or current standards used in the OHFA Compliance Division, throughout the term.

VII. Financial Feasibility: All developments will be required to meet the financial criteria outlined in the [OHFA Multifamily Underwriting Guidelines](#). Developments will be evaluated for financial feasibility and long-term viability in accordance with the above-mentioned guidelines and the Office of Management and Budget standard of cost reasonableness. Compliance with all federal cross-cutting requirements will also be evaluated.

OHFA may evaluate developments, including those that have previously received a HDAP award, and that have received other forms of federal subsidy to determine what amount, if any, the development needs to be financially feasible. OHFA may evaluate such developments to determine the facts and circumstances that necessitate the need for additional funds and to ensure projects are not over subsidized.

VIII. Application Review Criteria and Process: All programs under the HDAP includes reviewing all applications and required supporting documentation to ensure that the development is financially feasible and meets all OHFA requirements and the specific funding source, including CDBG-DR. OHFA reserves the right to determine cost reasonableness and fees associated with the development.

The application will be assigned to a Housing Grant Analyst (HGA) who will be responsible for application review, funding agreement processing and resolving post-award implementation issues.

Threshold Review: OHFA will review applications for funding to confirm they meet all program threshold requirements, as well as all applicable OHFA Underwriting Guidelines and Design Standards. Applications that do not meet the threshold requirements will not be considered for funding.

Financial Review: Each application will undergo a financial evaluation which will include a review of the financing sources, development budget, income and operating expenses, a cash flow analysis, and an evaluation to determine the amount of funds necessary to complete the actual project development, considering all other committed sources.

Review of development costs: OHFA will evaluate development cost by comparing application costs to similar developments from current and/or previous years, based on construction type, population served, and region. Additional information may be required for developments that exceed expected budget projections based on comparable developments. Developments that do not provide sufficient response or justification may be adjusted to match industry norms or removed from funding consideration.

Total development costs will be evaluated on a per-unit and per-square foot basis and are required to fall under the cost containment limits for both per-unit and per-square-foot established in the program guidelines. OHFA develops these cost containment limits on an annual basis by analyzing historical project cost data, stakeholder input, and construction industry research (such as the Turner Construction Cost Index, RSMeans, and data from the Associated General Contractors of America). OHFA will develop the cost containment limits for this program in conjunction with the program guidelines closer to application intake. OHFA will take into consideration the additional construction costs necessary for projects utilizing CDBG-DR funds for items such as hazard risk mitigation and sustainable site and building design when developing these limits. For reference purposes, current cost containment limits for projects seeking 9% low-income housing tax credits can be found on page 29 of the [2021 Qualified Allocation Plan](#). All projects are required to submit cost certifications upon completing the project, and may be subject to penalties if they exceed the original cost containment limits at construction completion. The Multifamily Underwriting Guidelines also include limits on construction interest,

contingencies, contractor fee, and contractor cost limits (profit, overhead, and general requirements).

Review of project pro forma: The financial review for rental housing developments includes the analysis of a 15- or 30-year pro forma, assuming a 2% annual revenue increase, a 3% annual operating expense increase, and a 7% stabilized vacancy rate. If the pro forma forecasts different assumptions, the developer must provide justification. The affordability analysis for rental developments requires the resident's rent and utility payments not to exceed 30% of an income-qualified household's income at the projected affordability level. Utility allowance information must be obtained from the local public housing authority, local utility provider, or other approved source (e.g. actual usage history on rehabilitation developments).

Evidence of cost controls: The U.S. Government Accountability Office (GAO) recently conducted a review of the Housing Credit program with a report on development costs published in 2018. The review examined cost certification data from 1,849 projects funded by 12 Housing Credit agencies in 10 states, Ohio included, over a period of 4 years. Of those agencies, Ohio had the third-lowest development costs per unit for new rental housing due in part to OHFA's well-developed cost containment policies. OHFA has already implemented many of the recommendations resulting from the GAO's review.

Additional details on OHFA's underwriting process and requirements can be found in the OHFA Multifamily Underwriting Guidelines.

Competitive Review Criteria: Once the review team determines that a proposal has satisfied all minimum threshold and underwriting requirements, it will evaluate the competitive review criteria. In a scenario where funding requested does not exceed the funding available, the competitive review criteria may not be utilized as long as the proposals meet all other minimum program requirements. Exact competitive review criteria scoring values will be determined through additional stakeholder and agency feedback, prior to the release of the program guidelines. It will include the following:

Type of affordability: Developments proposing newly affordable, newly constructed units

Prioritization: highest to lowest:

1. *Developments proposing newly constructed and newly affordable housing units*
 - a. *Also includes the adaptive reuse of structures not currently used for residential purposes.*
2. *Developments proposing rehabilitating existing, subsidized rental developments where the need for rehabilitation is a direct result of the tornadoes.*
3. *Developments proposing rehabilitating existing, subsidized rental developments where the need for rehabilitation is unrelated to the tornadoes.*

Number of units being proposed: Developments proposing a higher number of affordable units

Prioritization: highest to lowest:

1. *Developments proposing 60 or more affordable units*
2. *Developments proposing 40-59 affordable units*
3. *Developments proposing 30-39 affordable units*

Location of development: In an effort to add to the affordable housing stock in both areas of opportunity and areas identified as experiencing the most damage, developments in either of the locations identified in #1 below.

Prioritization: highest to lowest:

1. *Developments in an area of Montgomery County identified as being a “High” or “Very High” opportunity area, as identified in the OHFA/Kirwan Institute USR Opportunity Map; OR Developments in the most impacted and distressed zip code, 45426.*
2. *Developments outside of the above areas but located in the cities of Dayton and Trotwood, or in Harrison Township (locations identified by the Montgomery County Auditor as having the highest numbers of affected and/or destroyed apartments).*
3. *Developments outside of either of the above areas, but within Montgomery County.*

Range of incomes being served: Developments serving higher percentages of ELI renters

Prioritization- highest to lowest:

1. *Developments that commit to at least 20% of all affordable units being occupied by and affordable to households at or below 30% AMI.*
2. *Developments that commit to at least 15% of all affordable units being occupied by and affordable to households at or below 30% AMI.*
3. *Developments that commit to at least 10% of all affordable units being occupied by and affordable to households at or below 30% AMI.*

Accessible Design: Developments providing more-than-required number of 504-accessible units and/or units that incorporate a minimum number of universal design features. The current requirement is 5% for all OHFA-funded multifamily developments, regardless of federal funding

Prioritization- highest to lowest:

1. *Developments providing twice as many fully accessible 504 units than are currently required by OHFA*
2. *Developments providing a specified number of Universal Design components, as outlined in Appendix D of the State of Ohio 2020-2021 Qualified Allocation Plan, in 100% of affordable units.*
3. *Developments providing a specified number of Universal Design components, as outlined in Appendix D of the State of Ohio 2020-2021 Qualified Allocation Plan, in 50% and up to 100% of affordable units.*

Special consideration may be given to mixed-income, mixed-use, or other proposals that are transformative in nature and are highly impactful to the community.

Pre-Award Site Visit: OHFA may conduct a site visit prior to submitting a funding recommendation. The purpose of the visit is 1) to evaluate the proposed development site for suitability and impact on the surrounding community; 2) to confirm the status of previously funded developments; and 3) to develop the relationship between the applicant and OHFA. Both parties can discuss any issues or concerns regarding the proposed development and the organization has an opportunity to familiarize OHFA staff with their overall programs and operations.

Formal Recommendation for Funding: OHFA will present the development and submit a funding recommendation, either for approval or rejection, to the OHFA Board's Multifamily Committee. This Committee will submit a formal recommendation to the OHFA's Board for consideration and approval.

IX. Promotion and Marketing to Vulnerable Populations: While post-tornado data did not identify the impact to specific subsets of the population, the tornadoes had a disproportionate impact on areas whose residents have a lower median income and higher poverty rate than the county and state as a whole. Additionally, as stated earlier in the plan, Montgomery County has higher-than-average vulnerable populations, including disabled adults and individuals with substance abuse disorders, as well as a housing shortage for ELI and VLI renters.

Combining this information with other program goals (unit production, leverage, and development readiness, for example), OHFA plans to promote housing created with CDBG-DR funds to these vulnerable populations in the following ways:

- Competitive consideration for developments
 - Creating newly affordable units
 - Creating higher numbers of units
 - Serving higher percentages of ELI renters
 - Providing higher-than-required numbers of 504-accessible units and/or units that incorporate a minimum number of universal design features
- Requirement that each development provide service coordination to residents, including submitting a supportive services plan that OHFA will review and approve prior to leasing.
 - Supportive services plans must be unique to the development, identify the population served, and be customized to that population. Items the plan must specify include, but are not limited to:
 - Population(s) to be served and the experience that the supportive services provider(s) have serving the target population(s);
 - Methods to provide residents with information and referrals to all appropriate resources; and
 - Specific services to be provided, including all of the following:
 - Identifying partnerships with qualified service-provider agencies;
 - Methods to assess resident needs and develop a plan for service delivery;
 - Providing transportation to off-site services and referral entities;
 - Memorandum of understanding with all applicable local service providers; and
 - Methods to monitor and evaluate service delivery and outcomes.

While OHFA plans to promote housing for vulnerable populations through the actions above, we do not anticipate funding any solely permanent supportive housing (PSH) developments with CDBG-DR funding. OHFA will continue to fund PSH developments through other available funding programs that have been more closely tailored to the specific needs and requirements of these developments. Because PSH projects go through a well-defined and lengthy review and prioritization process by the applicable Continuum of Care, and because they are generally much more expensive to build and operate, the CDBG-DR funding is not a good fit for these projects.

The units created as a result of these funds will be marketed to those impacted by the tornadoes, including the vulnerable populations identified above. OHFA and Development will work closely with developer partners and local, state, and regional organizations that are most connected to these populations to ensure they have the opportunity to obtain safe, healthy, affordable, and accessible housing.

As the project owner and developer are primarily the parties responsible for the marketing a development, OHFA will require or encourage the following marketing practices by all CDBG-DR funding recipients.

Required:

- OHFA requires Affirmative Fair Housing Marketing Plans (AFHMP) and affirmative marketing procedures for all of its funded projects. Affirmative marketing procedures must continue throughout the affordability or compliance period. Guidance and policy regarding Affirmative Fair

Housing Marketing Plans can be found at <https://ohiohome.org/compliance/documents/ECP-21-AFHMP-Guide.pdf>

- Notification to all accessibility groups in the same county as the development that accessible housing is being proposed. Notification must be provided prior to submitting the funding application to OHFA, and the application must include copies of all correspondence between the applicant and accessibility groups to show compliance with these requirements. Owners agree to accept referrals for prospective residents and consider design recommendations for the property.
- Listing of the property on the [Ohio Housing Locator](#), which includes filters for senior housing, accessible units, bilingual landlords, and housing choice vouchers, as well as a separate section for disaster assistance/emergency housing.
- Incorporate priority selection criteria for impacted residents in a project's Tenant Selection Plan. Priority would be given to residents that were displaced and/or experienced major or severe damage from the tornadoes for a certain period of time after construction completion.

Encouraged:

- Advertising and marketing materials offered in alternative formats (braille, large print) or multiple languages.
- Notification to/coordination with (OHFA will provide assistance to funding recipients in connecting with these organizations):
 - Local housing organizations, such as Greater Dayton Premier Management and Miami Valley Community Action Partnership.
 - Local and regional fair housing agencies, such as Legal Aid of Western Ohio, Inc. and the Miami Valley Fair Housing Center.
 - Existing housing partners (and their local counterparts) in the Ohio Department of Medicaid, Ohio Department of Developmental Disabilities, and Ohio Department of Mental Health and Addiction Services and the Montgomery County Continuum of Care.

Additional Requirements for Developments Receiving CDBG-DR Funding:

- 1) Reporting and Record Keeping:** The applicant will be responsible for compliance with applicable implementation, reporting and recordkeeping requirements associated with CDBG-DR and state regulations.
- 2) Environmental Review Requirements:** OHFA conducts a supplemental environmental review for all projects receiving HDAP funds, including CDBG-DR. The environmental review will be completed in accordance with 24 CFR Part 58. Development serves as the Responsible Entity and will grant the environmental clearance to the development upon the HUD Release of Funds.
- 3) Development Standards:** Developments that involve rehabilitating structures must adhere to the [OCD Residential Rehabilitation Standards \(RRS\)](#) or other standards agreed upon by OHFA and the OCD. All new construction must adhere to [OHFA's Design and Architectural Standards](#), including all applicable local and state building codes.

In addition to meeting all energy efficiency requirements as stated in the Ohio Building Code or Residential Code, all multi-family developments receiving OHFA funding must obtain one of the following green building certifications as stated in the OHFA Design and Architectural Standards:

- Enterprise Green Communities
- Leadership in Energy & Environmental Design (LEED)
- ICC 700 National Green Building Standard (NGBS)

- 4) **Accessibility:** All developments receiving funding from OHFA funding are required to meet the accessibility requirements under Section 504 of the Rehabilitation Act of 1973. Additionally, all projects must to comply with the accessibility requirements as outlined in the Ohio Building Code, Chapter 4101:1-11, which includes the use of ICC/ANSI A117.1-2009 for the designing and constructing accessible units. In regard to requirements in 83 FR 5850, specific accessibility standards shall be detailed in the Program Policy for HDAP funds.
- 5) **Relocation Standards:** All developments, regardless of funding source, that involve rehabilitating existing occupied units must submit a Relocation Plan or rehabilitation strategy that outlines the plan to work with the tenants in place. If the development receives federal funds, the plan must meet the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. If the development involves acquisition, the applicant must supply the Real Property Acquisition and Relocation Certifications and Voluntary Acquisition Forms for the project.
- 6) **Changes to Approved Applications:** The HDAP recipient must notify OHFA, in writing, of all changes, financial or otherwise, relating to an application for financial assistance of an approved development. Failure to notify OHFA may jeopardize the applicant's ability to receive future assistance. If there are any substantive changes to the development prior to executing the Funding Agreement, OHFA may require the applicant resubmit the application.
- 7) **Cost Certification:** After construction is completed, each development may be required to obtain and submit a cost certification prepared by an independent certified public accountant or other comparable documentation approved by OHFA.
- 8) **Developer Fee Limits:** Developer's fee for applications submitted for HDAP funding must be consistent with the limits established in the OHFA Multifamily Underwriting Guidelines, QAP, BGF Guidelines, or other funding guidelines.
- 9) **Public Notification:** Applicants intending to develop rental housing must comply with the Ohio Revised Code §175.07 pertaining to public notification.
- 10) **Fees:**
 - Application Fee:* OHFA may elect to impose application, document correction and/or funding fees as it determines necessary. Fees may be based on threshold deficiencies and designed to encourage complete and accurate application submissions with a likelihood of success.
 - Amendment/Extension or Reinstatement to Funding Agreements:* OHFA may elect to impose a \$100 fee for each amendment or extension made to the funding agreement. OHFA may also elect to impose a \$1,000 fee to reinstate an expired funding agreement. These fees are implemented to encourage applicants to complete developments in a timely manner and as proposed in the application.
- 11) **Waivers:** OHFA reserves the right to waive state-imposed requirements if the applicant demonstrates a compelling reason. OHFA will review such requests on a case-by-case basis.

Activity Design: Single Family Homeowner Programs

Single Family Homeowner Programs

National Objective/ Eligible Activity Regulations	Benefit to low- and moderate-income persons 24 CFR 570.483
CDBG-DR Allocation	\$1,150,000
Projected Accomplishments	The state estimates it will be able to assist up to 5 low- and moderate-income households.
Proposed Start Date	2021
Proposed End Date	2025

To assist the most vulnerable families in their recovery efforts, Development developed a CDBG-DR Single Family Homeowner Rehabilitation Program to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster-resistant housing for residents impacted by the 2019 tornadoes. This program is critical to eligible areas' long-term recovery strategies

OCD has structured the Single Family Homeowner Program after an existing program currently administered in the non-entitlement areas of Ohio with State HOME and CDBG funds. The program has three possible activity categories: Owner Rehabilitation, Home Repair, and Pathways to Homeownership (New Construction and Homeownership Assistance). Owner rehabilitation is intended to address problems through the home, while home repair is intended to provide limited assistance to address one or more specific significant problems. Pathways to Homeownership will provide down payment assistance and/or mortgage subsidy to the newly built construction units to provide new affordable home opportunities for citizens impacted by the tornadoes.

Owner Rehabilitation

Eligible Activity Regulation:	24 CFR Part 570.202
Maximum Per Unit Limit of Assistance	\$100,000
Affordability Period	5 years

Owner Rehabilitation is intended to address problems throughout the home. In most circumstances, this means that the home's mechanical systems (electrical, plumbing and, heating systems) and exterior and interior structural components (roof, walls, floors, and foundation) will be repaired or replaced to meet the required standards. Occasionally room additions, such as extra bedrooms, can be constructed to alleviate overcrowded conditions, or other rooms and modifications can be constructed to make the home accessible in accordance with Section 504, as well as meeting the functional needs of residents in socially vulnerable populations. The work completed to improve accessibility will comply with or exceed the accessibility requirements of the Fair Housing Act, Section 504, and Titles II and III of the ADA.

This activity can include replacing an owner-occupied dwelling that is unable to be rehabilitated, with an approved manufactured unit or a site-built unit located on the same property. When Owner Rehabilitation funds are used to replace a unit (commonly referred to as "reconstruction"), the funds can only pay for construction-related expenses and eligible related soft costs. In limited instances, this activity can include refinancing a small amount of existing debt on a home to be

rehabilitated providing it is necessary to complete the project, as noted in 24 CFR Part 570.202 (b)(3). When refinancing is proposed, grantees must obtain prior from OCD. OCD encourages grantees to consider conducting an environmental assessment for the housing programs to ensure that the highest clearance level needed can be obtained. This will permit replacing substandard homes and other activities that, for environmental review purposes, are similar to “new construction” (such as room additions, tap-ins, etc.) to be conducted.

Because rehabilitation must correct all substandard conditions that adversely affect the occupant’s health and safety and the dwelling’s structural integrity, the scope of work is generally comprehensive, and the cost is usually high. However, cost limitations often require the work to be prioritized so that the most substandard conditions (i.e., problems affecting occupant health and safety and structural integrity) are corrected before less important concerns are addressed. OCD expects that all the substandard conditions be corrected before a project is considered complete. Homes that have numerous problems that cannot be corrected within the limit of financial assistance are inappropriate projects and must not be rehabilitated or considered for reconstruction unless sufficient funds from supplemental sources exist. The rehabilitation standard to which all projects must comply is in Part II of the OCD Housing Handbook known as the [State of Ohio Residential Rehabilitation Standard \(RRS\)](#).

With MVLTROG resource table, it is estimated units will not need this maximum amount of funding. The resource table reviews each project to assess where new donated materials and other funding sources can be collaborated. Nevertheless, this limit will allow for more flexibility when incorporating resiliency measures and green building standards.

Home Repair

Eligible Activity Regulation:	24 CFR Part 570.202 (b, 2, 4, 6, 7 (iv), and 11)
Maximum Per Unit Limit of Assistance	\$25,000
Affordability Period	Grant

The purpose of the Home Repair activity is to help preserve the affordable housing stock affected by the 2019 tornadoes by providing owner-occupied households with income levels at or below 80% of Area Median Income with limited financial assistance to correct significant problems in the home. Unlike Owner Rehabilitation, which addresses the entire home, the Owner Home Repair activity can address one or more specific problems that adversely affect occupant health and safety and/or structural integrity. The types of work that are generally considered eligible for the Owner Home Repair activity include, but are not limited to, structure, mechanical, plumbing, and well/septic system repairs, as well as, weatherization, accessibility and more. More detail on eligible repairs will be detailed in the policy and procedure manual.

New Construction/ Homeownership Assistance (Pathways to Homeownership)

Eligible Activity Regulation:	B.32 of section VI of 83 FR 5844 and 24 CFR 570.201(n)
Maximum Per Unit Limit of Assistance	\$250,000
Affordability Period	10 years, compliant with 83 FR 40314

The Pathways to Homeownership is a multifaceted program. The subgrantee or MVLTRG will work with local organizations, land banks and jurisdictions to identify the properties best [-suited] for this project. Following property acquisition, an affordable single-family house will be built on a vacant property. Upon completion, the home will be sold to an income-eligible household who is a disaster-impacted renter and now ready for homeownership. This household will be provided with homeownership assistance through a mortgage buydown. Therefore, the Pathways to Homeownership Program can fund both affordability and construction gap needs as one form of assistance.

New Construction

New Construction will create new permanent housing to expand the affordable owner-occupied housing stock. As part of the MVLTRG case management, these households have received counseling since the disaster through the local Home Ownership Center. This would allow households impacted by the disaster who are currently not in affordable housing to obtain long-term affordable housing in their own home. The New Construction activity will increase the number of owner-occupied households with income levels at or below 80% AMI and improve and protect that housing stock.

Construction Standards

The standard to which the reconstructed or newly constructed home must comply with is the [State of Ohio Residential Rehabilitation Standard \(RRS\)](#), resiliency measures and any locally adopted codes. For reconstructed units, to ensure that homes are safe, all defects that adversely affect the occupants' health and safety must be corrected prior to resale to the income eligible household closing and prior to the buyer occupying the home. A new home will be constructed to be purchased by a disaster impacted rental household with a household income that does not exceed 80 % of Area Median Income. When CDBG-DR funds are used for the new construction, recapture provisions outlined in and 83 FR 40314.

Homeownership Assistance

Homebuyer assistance may be provided if a home is available which does not require rehabilitation. This means that the home must either be a new or existing home that already meets applicable standards, or a home that the improvements have been completed by other programs or through the financing arrangement.

Through this activity, financial assistance is provided to households to purchase homes. The assistance may include providing a subsidy to lower the interest rate for the loan and/or principal amount, providing down payments, and paying reasonable closing costs. All loans from financial institutions must, at a minimum, meet the requirements outlined in OCD's Underwriting Process. Grantees must follow all Uniform Relocation Assistance and Real Property Acquisition policies and procedures to ensure that the purchases are considered voluntary.

Homebuyer Counseling

The new construction and homebuyer assistance activities must also include homebuyer counseling by a HUD Certified Homebuyer Counselor to help ensure that LMI homeowner are well informed about private financing and the real estate purchasing process.

Clients do not have to receive both New Construction and Homeownership Assistance; however, the two activities can be combined.

Cost Verification

Project bidding procedures will be detailed in the program policies and procedure manual. All construction costs will be reviewed for reasonableness and consistency with market costs at the time and location of construction.

Applicant Criteria

All applicant homeowners will be held to the following eligibility criteria:

- Must be primary resident homeowner; no second homes allowed.
- Must not resell rehabilitated homes solely for profit (A control measure will be put in place in the policies and procedures to prevent this).
- Household must have unmet housing need as a result of the 2019 tornado events after conducting a duplication of benefits analysis.

The Miami Valley Long Term Recovery Operations Group (MVLTROG) completed extensive outreach and marketing to ensure that tornado-impacted households know assistance is available. These marketing efforts included yard signs, commercials, and door hangers. MVLTROG will continue marketing as needed. Applicants will apply through the current *211 system with MVLTDROG as the first point of contact in order to remove obstacles to applicant participation. Applicants with unmet needs remaining in the MVLTROG case management system will be the first served and will be able to determine application status through case managers.

The Miami Valley Long Term Recovery Operations Group (MVLTROG) started a pilot program, Pathways to Homeownership, and completed extensive outreach and marketing to ensure that tornado-impacted renters are aware of the opportunity. The clients with unmet needs remaining in the MVLTROG case management system will be the first served.

Applicant Status

All applicant information is tracked in the American Red Cross' Coordinated Assistance Network (CAN). CAN, through its partner agencies, focuses on ways to best apply resources to serve those in need following a disaster using a variety of security measures to protect personal information. American Red Cross maintains physical, electronic and procedural safeguards to help prevent unauthorized access to and improper use of personally identifiable information. The CAN system follows all protocol for privacy.

Each member of the MVLTROG case management team has access to his or her assigned cases through a secure log in process. An individual can contact his or her case manager to inquire about the status of an application by providing his or her name and secure case number.

NFIP Requirement

Rehabilitated homes inside the 100-year floodplain must be insured under a flood insurance policy in the amount of the lesser of either the structure's full insurable value as determined by the applicable property insurer, or the maximum amount available for the structure under the National Flood Insurance Program (NFIP). The structure's full insurable value will be based upon the program's final total project cost for the applicant. Failure to maintain flood insurance will result in an applicant's property being ineligible for future disaster relief. Upon the property's sale or transfer, applicants will, on or before the date of transfer, notify all transferees in writing of the continuing obligation to maintain flood insurance on the property, and include the requirement on all documents and deeds.

Temporary Relocation

OCD will develop a temporary relocation assistance policy in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601 et seq.)

("URA") and section 104(d) of the Housing and Community Development Act (42 U.S.C. 5304(d))(Section 104(d)), as well as the implementing regulations for the URA at 49 CFR part 24 and the regulations for section 104(d) at 24 CFR part 42, subpart C as part of the policies and procedures governing the program.

Not Suitable for Rehabilitation

The definition of "not suitable for rehabilitation" will be defined in the policies and procedures governing the program.

Exemptions

Exemptions to the Single Family Homeowner Program award maximums will be granted on a case-by-case basis.

Activity Design: Administration and Planning

Administration and Planning Activities

National Objective/ Eligible Activity Regulations	24 CFR Part 570.206
CDBG-DR Allocation	\$705,000
Proposed Start Date	2020
Proposed End Date	2025

As stated in the Federal Register Notice, grantees can use up to 5% of the total grant award for grant administration. This allocation will cover administrative costs to run the program and is designated for local government subrecipients and Development. Up to 15% of the total grant award maybe used for planning, however Ohio will utilize less than 1% for development and reassessment of the Action Plan.

Administration Costs

Eligible Activity Regulation: 24 CFR Part 570.206

A maximum of 5% of the total grant request may be budgeted for eligible general administrative activities. The Fair Housing activities may be included in the CDBG administrative funds request. Eligible administrative costs are identified at 24 CFR 570.206 for CDBG Program funds. All soft costs related to work completed on a specific unit meeting a national objective or income eligibility must be paid for in one of two ways: (a) these costs may be charged to the unit; or (b) these costs may be charged to administration. All soft costs associated with projects that do not meet a national objective or income eligibility must be charged to administration. Eligible soft costs for the CDBG Program are defined at 24 CFR Part 570.202(b)(9).

Fair Housing

Eligible Activity Regulation: 24 CFR Part 570.206

Grantees must establish a Fair Housing training and outreach program specific to CDBG-DR Program activities and participants. Fair Housing information (i.e., brochures) must be distributed to each program applicant and/or assistance recipient. Grantees are required to establish a system to intake and process fair housing complaints. Grantees must maintain records to document implementing the Fair Housing program.

Planning

Eligible Activity Regulation: 24 CFR Part 570.205

Approximately 1% of the total grant award will be budgeted for eligible planning activities. Planning activities which consist of all costs of data gathering, studies, analysis, needs assessment and plan preparation and identifying actions that will implement the CDBG-DR Action Plan.

Expenditure Schedule

Expenditure Schedule will be included with the Financial Certifications submitted to HUD.

General Requirements

Protection of People and Property: Construction Methods

The housing assistance provided under the CDBG-DR program will be built with emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. These include the following minimum standards:

- Construction standards will be based on Ohio's Building Codes and must meet or exceed applicable requirements. HDAP new construction projects must meet [OHFA's Design and Architectural Standards and Rehabilitation](#) and Single Family Homeowner Projects must meet Development's [Residential Rehabilitation Standards](#).
- Construction will comply with a Green Building Standard for all new residential building construction and for all substantially damaged residential building repairs. The state will require that these construction and repair activities meet an industry-recognized standard that has achieved certification under at least one of the programs listed in paragraph B.32.a of Section VI. (83 FR 5850 and 83 FR 5861).
- Construction will comply with the accessibility requirements of the Fair Housing Act, Section 504, and Titles II and III of the ADA.
- For rehabilitating non-substantially damaged buildings (where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab), the state will follow the Green Building Retrofit Checklist. To note, this requirement does not apply when Energy Star, Water-Sense Labeled, or FEMP-designated products do not exist. (83 FR 5850 and 83 FR 5861).
- OCD will provide a mechanism for homeowners to appeal rehabilitation work quality.
- OCD will require a warranty period post-construction for housing with all work being performed by the contractor. Information about the complainant's rights and how to file a complaint or appeal regarding work quality will be printed on program applications and/or guidelines. Complaints should be submitted to the local government subrecipient and responded to in a timely manner. The local government subrecipient will keep records of each complaint on file.

Home Elevation

The State of Ohio and its subrecipients will adhere to the advanced elevation requirements established in paragraph B.32.e of section VI (83 FR 5861) by evaluating the costs associated with elevating structures on a case-by-case basis. The elevation cost is site specific and depends on site context and accessibility, and the type and size of the structure. For reference, the Ohio Emergency Management Agency (OEMA) provided an estimate of the average costs associated with elevating structures based on recent data from Ottawa County, Ohio. Using a dataset composed of single family dwellings built between 1930 and 1969 on either slab or crawl space foundations, OEMA calculated an estimated average elevation cost of \$111,955. The state and its subrecipients, in consultation with the Montgomery County Office of Emergency Management and/or the OEMA, will evaluate the cost effectiveness of each proposed new construction, substantial damage repair or improvement in the 100-year floodplain to determine if elevation or an alternative strategy is cost reasonable and consistent with the Montgomery County Natural Hazard Mitigation Plan's goals.

The state will require the following elevation standards for new construction, repair, or substantial damage, or substantial improvement:

All structures designed principally for residential use and located in the 100-year (or 1% annual chance) floodplain that receive assistance, 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.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are in a FEMA-designated floodplain. This requirement is mandated to protect resident safety and their property and federal funding investments. The state will ensure adherence to Section 582 of the National Flood Insurance Reform Act requiring property owners receiving disaster assistance triggering the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so.

By achieving the goals within this Action Plan, initiating strong and energy efficient building codes, and requiring both residential and non-residential structures be built at least two feet above the new Advisory Base Flood Elevation (ABFE), the state guarantees a more successful long-term disaster recovery.

Any elevation construction will comply with the Fair Housing Act's accessibility requirements in Section 504, and Titles II and III of the ADA. Elevation activities and eligible costs will be further defined in the program guidelines.

Section 8 Tenants and Housing Needs of Persons that are Homeless

OCD will encourage subrecipients to identify private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program; and any other housing assisted under a HUD program that needs rehabilitation, reconstruction, or replacement. OCD will also encourage subrecipients to identify emergency shelters and transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are homeless and at-risk of homelessness. OCD has existing programs that subrecipients may refer these persons to that may be able to help.

Cost Reasonableness/Effectiveness

Cost-effectiveness will be outlined in the Disaster Recovery Program Housing Guidelines. The program guidelines for HDAP will detail the controls for housing projects involving eight or more units.

Demonstrable Hardship and Exceptions

OCD will further develop detailed program guidelines in and exceptions to the policies and procedures to address situations not considered during the program design phase. The exceptions policies and procedures will consider changes to the maximum award amounts for applicants who demonstrate undue hardship and other exceptional situations. Demonstrable hardship may include but is not limited to prolonged job loss, substantial reduction of household income, death of a family member on whom the surviving household was financially dependent, illness, unexpected and extraordinary medical bills, disability, etc. OCD will further define "demonstrable hardship" and the exception policies in program policies and procedures.

Stormwater Infrastructure Needs

The state will work with local government subrecipients to identify stormwater infrastructure needs. Stormwater improvements will be made as a result of a housing need within flood-impacted areas.

Leveraging of Funds

OCD is seeking to leverage CDBG-DR funds on projects utilizing Low Income Housing Tax Credits (LIHTC). Although a tax credit allocation is not considered federal financial assistance under the Uniform Relocation Act and Section 104(d) of the Community Redevelopment Act of 1974, OCD

requires owners of projects that receive a Tax Credit Allocation make every effort to minimize displacing existing tenants.

No other federal funds are expected to be used on the projects.

Additional Resources

CDBG-DR funds are a last resort funding source. The state worked with HUD, FEMA, SBA, other federal agencies and state agencies to identify and catalog available sources of assistance for recovery from the 2019 Presidentially Declared Disaster. OCD will ensure that CDBG- DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

- FEMA Individual Assistance grants, FEMA Hazard Mitigation Grant Program, SBA Disaster Loans,
- Federal Home Loan Bank Disaster Recovery Program,
- Private insurance, and
- Private foundations

Other Funding Sources

Montgomery County is planning to support projects and activities in the balance of county area, i.e. impacted communities of Trotwood, Harrison, Riverside, et al., but not within the City of Dayton. This is because the City of Dayton receives their own allocations of funds from the U.S. Department of Housing and Urban Development, such as Community Development Block Grant (CDBG) and HOME programs. In the event that affordable rental units are sited in communities that were not tornado impacted but that provide opportunities for displaced and impacted residents, Montgomery County is agreeable to considering those projects as well. Currently, Montgomery County has a minimum of \$100,000 available from the HOME program for leveraging with tax credit projects. Montgomery County can also provide HOME funds for down payment assistance for first-time homebuyers, and this is estimated to be \$100,000. Montgomery County can also provide up to \$500,000 from CDBG funds for demolition of properties that meet the definition of blighted, especially in those neighborhoods where CDBG-DR funds are being utilized to further stabilize the neighborhood.

The City of Dayton set aside a total of \$490,180 in CDBG funding for tornado response. Of the funding set aside, \$125,400 is being spent on the Long-Term Recovery Case Management program. Dayton currently does not yet have a use for the remaining \$364,780 as of yet. We have not allocated any funds (CDBG or HOME) for housing of any kind.

ReTreet – The organization focuses on the restoration of trees on private properties and work with individual homeowners. They are a national organization with support from big companies. ReTreet CEO visited Montgomery County in October 2020. They will visit twice a year starting in spring 2021. ReTreet will utilize volunteers and will pick a different neighborhood for each visit. 300 trees per neighborhood will be planted each time ReTreet visits.

The Ohio Safe Room Rebate Program was developed by the Ohio Emergency Management Agency to provide a rebate for the purchase and installation of safe rooms for Ohio homeowners. Homeowners that are selected and qualify for the rebate program are eligible for a rebate of 75% of the allowable costs that was used to install and construct their safe room, up to a maximum of \$4,875. Homeowners that have been selected must also be able to attend a mandatory "Safe Room Briefing" meeting to be eligible for the rebate. Funding for the Ohio Safe Room Rebate Program is made available through the Federal

Emergency Management Agency (FEMA) Hazard Mitigation Assistance (HMA) Grant Program (75%), and homeowner contributions (25%). The Ohio Emergency Management Agency plans to offer this program on an annual basis, contingent upon federal and/or state funding.

Part 6: Program Administration

Citizen Participation – Outreach Efforts

Development in conjunction with the Ohio Housing Finance Agency met with local officials of most impacted and distressed (MID) area, Montgomery County and City of Dayton after receiving notification of the state's CDBG-DR allocation. OCD informed the communities of the state's CDBG-DR Program allocation and discussed MID and housing requirements, discussed the tornadoes' impact, and further assessed unmet need.

Development staff attended monthly MVLTRG Individual Recovery Group monthly meetings and Impacted Jurisdiction meetings quarterly. The MVLTRG has a vast membership including local citizens, discussing the current needs of individuals impact by the disaster. This allowed OCD to access current needs.

Public Notice and Comment Period of Draft Action Plan

Development encourages involvement from citizens in all aspects of the CDBG-DR Program. To this end, Development seeks to ensure citizens and interested members of the public have an opportunity to review and comment on the draft Action Plan. The draft Action Plan will be posted on Development's website for a 30-day public review period beginning on July 9, 2020. A summary of all comments and responses will be included in the final Action Plan submitted to HUD for approval. The final, HUD-approved Action Plan will be posted on Development's website at https://development.ohio.gov/cs/cs_cdbq-dr.htm.

Amendments to the Action Plan

As additional information becomes available and programs evolve through the grant administration process, amendments to this plan are expected. Prior to adopting any substantial amendment to this Action Plan, Development will publish the proposed amendment on the CDBG-DR web page and will afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan's or amendment's contents and make comments. Substantial amendments include adding or deleting any allowable activity described in the approved application; allocating or reallocating more than \$1 million; or a change in planned beneficiaries. Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery web page. For other non-substantial amendments, the state will notify HUD, but public comment is not required. Every amendment, substantial or not, will be posted on the CDBG-DR web page in addition to all previous versions of the plan.

Performance Reporting

In accordance with HUD requirements, OCD will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following the end of each calendar quarter. Program QPRs will be posted to Development's website on a quarterly basis until all funds are expended and all expenditures reported.

Limited English Proficiency and Accessibility

OCD is committed to providing all citizens with equal access to information regarding the CDBG-DR Program, including persons with disabilities and limited English proficiency (LEP). OCD follows HUD's

regulation, 24 CFR Part 1, “Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development—Effectuation of Title VI of the Civil Rights Act of 1964”, which requires all HUD grantees provide meaningful access to LEP individuals. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Where a significant number of non-English speaking residents can be reasonably expected to participate in public hearings or open comment periods, printed materials will be translated into the appropriate language, citizen comments in a language other than English will be translated, and translators will be present.

All documentation available to the public on Development’s website will be available in the appropriate language of the individual accessing it. The website and plan will be Section 508 compliant; Ohio follows ADA-compliant standards for website accessibility and readability. The content and web page layout are designed with best practices for people who use adaptive aids.

Applicants

Application intake will be performed by the subgrantees. Subgrantees will be required to keep applicants informed on their application status and be responsive to inquiries.

Citizen Complaint Procedures

Citizens may file a written complaint or appeals through the Disaster Recovery email at CDBG-DR@development.ohio.gov or submit by mail to the following address:

Ohio Development Services Agency
Office of Community Development
Attention: CDBG-DR
77 South High Street
Columbus, OH 43215

OCD will make every effort to provide a timely response within 15 working days of the receipt of complaint, where practicable. Responses to documents mailed to the office may experience longer delays due to remote work as a result of the COVID-19 pandemic.

Program Income

The state will not generate program income separate from its subrecipients, as it will not be directly implementing any part of the CDBG-DR program. Program income will be tracked by Development subrecipients and reported with each draw request. Development’s Program Income Policy can be found at <https://development.force.com/OCDTA/s/article/15-04-Program-Income-Policy>.

The state will permit local governments and subrecipients to retain program income and establish program income accounts in the DRGR system. The state acknowledges that the Disaster Recovery Grant Reporting (DRGR) system requires grantees to use program income before drawing additional grant funds and will ensure that program income retained by one organization will not affect grant draw requests for other organizations. Program income will be reported in the DRGR system in a timely and accurate manner as defined by Federal Register prior notices.

Each subrecipient will execute a Revolving Loan Fund (RLF) Agreement with Development. Any income received after the grant closeout, will be transferred to the subrecipient's CDBG Revolving Loan Fund (RLF) account to continue CDBG-eligible activities. Proceeds from the disposition of real property constructed or improved partially with CDBG-DR funds shall be prorated to reflect the percentage of CDBG-DR funds used.

Pre-agreement Activities

The provisions at 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs it, its subrecipients and subgrantees incurred on or after the covered disaster occurred. The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by it, its subgrantees or subrecipients prior to executing a grant agreement with HUD. This includes but is not limited to activities supporting program development, action plan development and stakeholder involvement support and other qualifying eligible costs incurred in response to an eligible disaster covered under Public Law 116-20. OCD incurred pre-award costs and will seek reimbursement for these costs that are reasonable and allowable under this regulation. These include salary, fringe benefits, and direct operating costs for each employee based on their individual percentage of time spent on planning the state's CDBG-DR program.

Anti-displacement

The State of Ohio plans to minimize displacing individuals or entities and assist individuals or entities displaced due to implementing a project with CDBG-DR funds. The state will ensure that the assistance and protections afforded to individuals or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The state accepts the HUD waiver of Section 104(d) requirements which assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-5938-N-01.

Ohio will ensure CDBG-DR funded activities will be designed to minimize displacement. In accordance with the Housing and Community Development Act of 1974, as amended, (HCDA), and U.S. Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and 570.440 (1), use of Community Development Block Grant Disaster Recovery (CDBG-DR) funds must minimize adverse impacts on LMI persons.

Based upon the Unmet Needs Assessment, Tenant Relocation Assistance is not a defined program activity in this disaster recovery strategy, however it may be applicable to acquisition activities. The state will ensure full compliance with URA should the program discover a renter living in a home being purchased or acquired as part of the program. The state recognizes URA requirements and will ensure that UGLGs, nonprofit and for-profit developers purchasing and acquiring homes will abide by the state's policies and procedures and the following terms and conditions.

Waivers

For the purpose of promoting the availability of decent, safe, and sanitary housing, HUD waived the following URA and section 104(d) requirements with respect to using CDBG-DR funds, as applicable:

- Tenant-based Rental Assistance: The requirements of sections 204 and 205 of the URA, and 49 CFR 24.2(a)(6)(vii), 24.2(a)(6)(ix), and 24.402(b) are waived to the extent necessary to meet all

or a portion of replacement housing payment obligations to a displaced tenant by offering rental housing through a tenant-based rental assistance (TBRA) housing program subsidy, (e.g., Section 8 rental voucher or certificate), provided that comparable replacement dwellings are made available to the tenant in accordance with 49 CFR 24.204(a) where the owner is willing to participate in the TBRA program, and the period of authorized assistance is at least 42 months. Households may be denied URA assistance as a result of being unable, because of a major disaster as determined by the President, to meet the occupancy requirements set by the URA.

- One-for-one replacement: Requirements at section 104(d)(2)(A)(i) and (ii) and (d)(3) of the Housing and Community Development Act and 24 CFR 42.375 regarding one-for-one replacement are waived in connection with funds allocated under this notice for lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation. This waiver exempts disaster damaged units that meet are “not suitable for rehabilitation”, defined by the Ohio CDBG-DR Program as those units for which the rehabilitation cost, including clear consideration for resolving issues affecting health and safety, exceeds the project’s cap.
- Housing incentive payments: 42 USC 5305(a) and associated regulations are waived to the extent necessary to provide housing incentives as appropriate for the purpose of relocating to a suitable housing development or an area promoted by the community’s adopted recovery plan.
- Occupancy requirement: Homeowner occupants and tenants displaced from their homes as a result of the identified disasters and who would have otherwise been displaced as a direct result of any acquisition or demolition of real property for a federally funded program or project may become eligible for a replacement housing payment notwithstanding their inability to meet occupancy requirements prescribed in the URA. To the extent that it would apply to real property acquisition, rehabilitation or demolition for a project commencing more than a year after the Presidentially declared disaster, Section 414 of the Stafford Act and implementing regulation at 49 CFR 24.403(d)(1) are waived, provided that the project was not planned, approved or otherwise underway prior to the disaster. See exception for persons meeting occupancy requirements and/or displaced due to other HUD-funded projects at 83 FR 5859.

Low-income households permanently displaced as a result of CDBG-DR activities will be provided with relocation assistance under the URA and implementing regulations at 49 CFR Part 24.

Appendices

Public Comments on the CDBG-DR Action Plan

The Office of Community Development held the 30-day public comment period beginning July 9, 2020, along with a virtual Public Hearing that was held via WebEx on July 23, 2020. All information that was made available for public viewing and comment along with the memo announcing these opportunities was posted on the Development website at https://development.ohio.gov/cs/cs_cdbg-dr.htm

All comments received along with the corresponding responses prepared by OCD concerning the Draft PY 2020 CDBG-DR Action Plan have been included below:

Tawana S. Jones
Community and Economic Development Operations Manager
Montgomery County Business Services-Community and Economic Development

Comment/Question:

Can you provide additional clarification about the funds being used in areas outside of zip code 45426?

Response:

HUD requires 80% of the funding to be spent in the Zip Code 45426 (Trotwood) by regulation. However, understanding that maybe too restrictive, HUD allows in 83 FR 5868 for the 'most impacted and distressed' (MID) area to be opened to the entire County in which the zip code sets. Therefore, Montgomery County (including the City of Dayton) will be the eligible area for the projects, with a focus on the Trotwood/Harrison township area if possible. Due to the small amount of funding received for CDBG-DR, Development decided to limit all funds to Montgomery County (MID area) to provide the most impact.

Adam Blake, Vice President of Housing
County Corp Affordable Housing

Comment/Question:

Currently there are four agencies working with homeowners in Montgomery County directly impacted by the Tornadoes with funding provided by the Federal Home Loan Bank of Cincinnati's Disaster Recovery Program: County Corp, Rebuilding Together Dayton, Habitat for Humanity and MV CAP. Here is the most recent reporting from the FHLB:

FHLB Disaster Recovery Program, Dayton, Ohio

2019

Partnership	Number	Amount
County Corp and CareSource	6	\$96,465
Habitat and CareSource	2	\$25,792
MVCAP and Key	6	\$120,000
Rebuilding Together Dayton and Huntington	7	\$95,680
Total	21	\$337,937

2020

Partnership	Number	Amount
County Corp and CareSource	12	\$186,865
Habitat and CareSource	17	\$217,724
MVCAP and Key	0	\$0
Rebuilding Together Dayton and Huntington	5	\$68,757
Total	34	\$473,346

Total

Partnership	Number	Amount
County Corp and CareSource	18	\$283,330
Habitat and CareSource	19	\$243,517
MVCAP and Key	6	\$120,000
Rebuilding Together Dayton and Huntington	12	\$68,757
Total	55	\$811,284

Withdrawn

Partnership	Number	Amount
County Corp and CareSource	4	\$36,500
Habitat and CareSource	1	\$11,385
MVCAP and Key	0	\$0
Rebuilding Together Dayton and Huntington	0	\$0
Total	5	\$47,885

Completed

Partnership	Number	Amount
County Corp and CareSource	3	\$37,655
Habitat and CareSource	9	\$98,688
MVCAP and Key	5	\$77,081
Rebuilding Together Dayton and Huntington	8	\$59,768
Total	25	\$273,193

FHLB CAP is \$500,000 per sponsor and member totaling \$2,000,000 per year.

Eligibility ends June 18, 2021

The last day a reservation can be submitted is 6-18-21. Commitment expiration would be 1 year or 6 months after the approval date, depending on the project type.

You'll note that MVCAP has made the least number of reservations and requested the lowest amount of funding. Given this, I am concerned that MV CAP is the only agency listed in the CDBG DR Draft to assist homeowners with this program.

From Page 75 of the draft: *Applicants will apply to the MVCAP, the Miami Valley Individual Recovery point of contact. This will help remove obstacles to the applicant participation. Applicants will be able to determine application status through case managers. MVCAP's website will include a listing of all intake centers and contact information.*

Based on the evidence and performance of all four agencies listed above and the capacity these agencies have developed with FHLB DRP, it doesn't make sense to have MVCAP the only agency involved in working with homeowners who are dealing with repair issues. MVCAP has worked with the LEAST number of homeowners with the FHLB DRP program. Why wouldn't ODSA want ALL of the agencies with capacity and experience working with these homeowners?

Response:

Thank you very much for this information and feedback.

This was a misunderstanding that MVCAP was the first point of contact for all the Miami Valley Disaster Individual Recovery funding. There was no attempt to exclude anyone, only identify the system already in place. Therefore, the CDBG-DR Action Plan has been updated to reflect the applicant will apply through the current system for individual recovery in place with the *211 line.

Matthew Currie, Managing Attorney
Advocates for Basic Legal Equality, Inc.

Comment:

- Advocates for Basic Legal Equality and the Miami Valley Fair Housing Center
- LIHTC Awards in Ohio, 2006-2015: Where are They Providing Housing for Families with Children?
- Using LIHTC to Provide Housing Opportunities for Families with Children in Ohio: Progress Report 2018

Response:

Upon approval of the plan, OHFA will begin to develop a Request for Proposals (RFP) with competitive criteria similar to that which is included in their Qualified Allocation Plan (QAP) and their Bond Gap Financing (BGF) guidelines. As noted in the plan, the State of Ohio has the discretion to expand the target area to include the entirety of Montgomery County and intends to do so. OHFA will consider inclusion of competitive criteria or incentives to develop in areas with less than 10% poverty, and/or less than 25% racial concentration, and/or in areas of High and Very High Opportunity according to OHFA's USR Opportunity Index, developed in partnership with The Ohio State University's Kirwan Institute for the Study of Race and Ethnicity.

**Written Comments of
Advocates for Basic Legal Equality
and the
Miami Valley Fair Housing Center
on the
Development Services Agency's Office of Community Development
Draft Program Year (PY) 2020 Community Development Block Grant Disaster Recovery
(CDBG-DR) Montgomery Country Action Plan**

Pursuant to the July 9, 2020 Notice of Public Hearing and 30-Day Public Comment Period from Matthew LaMantia, Deputy Chief, Office of Community Development, these Comments are being submitted on August 9, 2020 via email to CDBG-DR@development.ohio.gov

Introduction

Thank you for the opportunity to provide comments to the Ohio Development Services Agency's Office of Community Development Disaster Recovery CDBG-DR Plan for Montgomery County ("Action Plan"). Advocates for Basic Legal Equality, Inc. ("ABLE") is a non-profit regional law firm that provides high quality legal assistance in civil matters to help eligible low-income individuals and groups in western Ohio, including Montgomery County, achieve self-reliance, and equal justice and economic opportunity. Part of our work is to use the law to support community efforts that will stabilize property values, increase economic resources and improve the quality of life in the communities where our client populations lives. The feedback and suggestions below are informed by our work, including our work that supports community efforts to grow our local economy and create wealth from the ground up.

The Miami Valley Fair Housing Center, Inc. ("MVFHC") is a private, nonprofit 501(c)(3) organization in Dayton, Ohio, that recognizes the importance of "home" as a component of the American dream. We seek to eliminate housing discrimination against all persons because of race, color, religion, national origin, sex, disability, familial status, or any other characteristic protected under state or local laws. For the past 27 years, the Fair Housing Center has passionately pursued its mission to eliminate housing discrimination and ensure equal housing opportunity for all people in our region, the State of Ohio, and nationally.

Among the Fair Housing Center's core mission and goals is to support diverse and inclusive neighborhoods replete with the opportunities and resources people need to thrive. We work for the elimination of segregation in housing and the ability of our constituents to live in racially integrated communities. MVFHC has launched multiple educational campaigns to address housing discrimination designed to teach both consumers and housing professionals about equity

for neighborhoods, the negative consequences that flow from racial steering, and the benefits of residential diversity. The Fair Housing Center also has goals of identifying barriers to fair housing, protecting and improving fair housing laws, increasing broad public awareness and support of equal housing opportunity, and increasing investments in under resourced communities of color.

As organizations who constantly work to implement equity and anti-racist lenses to our advocacy, we submit these comments with a focus on ensuring equal housing opportunity for all families impacted by the tornados and the communities in Montgomery County. We are concerned and want to ensure the Action Plan will enable the State of Ohio, the Ohio Housing Finance Agency (“OHFA”) and local jurisdictions, as recipients of federal funds, to meet their legal obligation to affirmatively further the purpose of the federal Fair Housing Act, as amended. 42 U.S.C. §§ 3601 *et seq.*

There are four compelling reasons to revise the Action Plan: (1) The Action Plan relies upon the State of Ohio’s Analysis of Impediments to Fair Housing Choice (AI), not the regional AI for Montgomery County, and the Cities of Dayton and Kettering; (2) The 2019 Memorial Day Tornadoes primarily affected high poverty and racially segregated neighborhoods in Montgomery County; (3) While investment in the areas most critically affected by the tornadoes is important, the Action Plan fails to take into consideration the long-term pernicious racial segregation in Montgomery County; and (4) In order to meet obligations to promote fair housing choice¹ the State of Ohio and OHFA must develop affordable housing in areas of Montgomery County with poverty

¹ Both ABLE and the MVFHC have been in communication with OHFA since at least 2015 noting OHFA LIHTC awards have perpetuated racial and economic segregation of families with children in Ohio urban areas, including Montgomery County. These letters and other comments to OHFA are supported by two independent reports, from Abt Associates, published in 2016 and 2018. These reports are attached.

rates of less than 10 percent and areas with low racial concentrations where less than 25 percent of the population is Black or African American².

Background

Dayton, like other Ohio cities and cities throughout the country was built during a time of government sponsored and sanctioned discriminatory policies.³ For example, in 1937 the Home Owners' Loan Corporation created a "Residential Security 'Redlining' Map" for the Dayton area⁴ along with area description explaining the basis for the grade in area of the map.⁵ This map and the Area Descriptions "document how loan officers, appraisers, and real estate professionals evaluated mortgage lending risk during the era immediately before the surge of suburbanization in the 1950's."⁶ "Neighborhoods considered high risk or 'Hazardous' were often 'redlined' by lending institutions, denying them access to capital investment which could improve the housing and economic opportunity of residents."⁷ African Americans, immigrants, and low wage workers made up the population, or the projected population, of the neighborhoods deemed high risk, hazardous and therefore red lined.⁸

Like the rest of the country, these discriminatory policies are still impacting the lives of Dayton residents.⁹ The Action Plan briefly discusses high and low-opportunity areas, and how the

² In these comments, the terms "Black" and "African American" are used interchangeably.

³ See generally, Richard Rothstein, *The Color of Law, A Forgotten History of How Our Government Segregated America* (2017).

⁴ https://library.osu.edu/documents/redlining-maps-ohio/maps/Dayton_map.JPG.

⁵ https://library.osu.edu/documents/redlining-maps-ohio/area-descriptions/Dayton_Area_Description.pdf.

⁶ Bruce Mitchell PhD, *HOLC "redlining" maps: The persistent structure of segregation and economic inequality*, National Community Reinvestment Coalition, March 20, 2018.

⁷ *Id.*

⁸ See, e.g., Home Owners Loan Corporation (HOLC) Residential Security "Redlining" Map Area Descriptions Dayton, Ohio 1937.

⁹ See, e.g., Pub. Health Dayton & Montgomery Cty., *Opportunity Mapping: The Geography of Opportunity Dayton Ohio* (2015), http://www.mvfairhousing.com/ai2015/2015-02Opportunity_Mapping.PDF; Pub. Health Dayton &

destruction from the Memorial Day Tornadoes of 2019 primarily impacted those low-opportunity areas. (Action Plan at 59-61). “Low-opportunity areas” are closely aligned with redlined neighborhoods. As the Action Plan explains, the State of Ohio and OHFA are prepared to invest in these areas to create more affordable housing (Action Plan at 67-71), ABLE and the MVFHC are concerned that this will only perpetuate the segregation of low-income families and people of color in these “low-opportunity areas.”

Discussion

1. The Action Plan must incorporate and rely upon the local Analysis of Impediments.

The Action Plan seems to rely only on the State of Ohio Analysis of Impediments to Fair Housing and the recommendation in the state AI, although it references the “Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering”. (Action Plan at 40-45). The AI assists in the statutory requirement to affirmatively further fair housing by ensuring housing and community development programs not only do not discriminate, but that they identify, plan for, and take active steps to undo historic patterns of segregation and other types of discrimination. An AI also identifies needs for access to opportunity for those to whom it has historically been denied, including access to better education, jobs and living conditions like the kinds of physical danger residents may be exposed to, the kinds of professional and social associations available in the community, and what kinds of values and expectations are opened up to residents. If the Action Plan does not incorporate the Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering and

Montgomery Cty., Opportunity Mapping: The Geography of Opportunity Montgomery County Ohio (2015), and https://www.mcoho.org/departments/human_services_planning_and_development/MC_Opportunity_Map.pdf.

intentionally address the identified impediments, these CDBG-DR funds will not only fail to affirmatively further fair housing, but also will perpetuate enduring patterns of segregation.

2. The 2019 Memorial Day Tornadoes primarily impacted low-opportunity areas in Montgomery County.

In 2015 Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering (“AIMC”),¹⁰ opportunity maps illustrate where in the City of Dayton there is more or less opportunity. “Opportunity” was defined as having access to “employment, healthcare, decent and affordable housing, quality education, and goods and services.” (AIMC at 39). There are also opportunity maps for Montgomery County,¹¹ created by the same public entity whose map is used in the AIMC, that clearly show the neighborhoods impacted by the tornadoes are generally low opportunity areas, “due to housing and neighborhood conditions, transportation options, [and] access to healthcare, goods, and services.” (AIMC at 39). The Action Plan also notes areas hit by the tornadoes – the City of Trotwood, Harrison Township, and Northwest Dayton – were in the very lowest opportunity index for Ohioans *prior to the tornadoes* and are now areas with a “strong decline” in the likelihood for community change. (Exhibit 4-3 of Action Plan at 60). The bulk of the impacted areas are primarily neighborhoods of color, and low-moderate income census tracts. Additionally, the Northeast Dayton impacted area has a high percentage of persons who speak English “less than well.” (AIMC at 14-25; Exhibit 1-16 of Action Plan at 27).

¹⁰ AIMC is available at

http://mvfairhousing.com/ai2015/2015-10-23_2015_AI_Montgomery_County_Dayton_Kettering.PDF.

¹¹ While the AIMC contains an opportunity map for the City of Dayton completed by Public Health Dayton & Montgomery County, Public Health released an opportunity map for the entire county in May 2015. It is available on the Montgomery County website, https://www.mcohoio.org/departments/human_services_planning_and_development/MC_Opportunity_Map.pdf.

Twenty separate tornadoes struck the Dayton area on Memorial Day weekend 2019. More than 6,000 homes were affected, and unfortunately, most of the damage occurred in areas with low to moderate income residents. (Exhibit 1-18 of Action Plan at 28). Fifty-two percent were single-family dwellings, 46% were apartments, and 2% were mobile homes. (Action Plan at 46). Sixty-two percent of the affected residents were not insured, and 14.9% were in poverty households. (Action Plan at 48). HUD identified zip code 45426 in Montgomery County (the City of Trotwood) as the most impacted and distressed area because of the tornadoes. According to selectmcoho.com, 71.1% of residents in Trotwood are Black or African American, and 23.3% are White. In Harrison Township, also impacted by the tornadoes, 44.27% of residents are Black and 50.95% are White. (*See also* AIMC at 24).

Under-resourced areas like Trotwood, Harrison Township, or Northwest Dayton means students in the school district experience more homelessness,¹² renters experience severe housing cost burdens,¹³ and the communities have a high poverty rate.¹⁴ According to the Action Plan, the low-to-moderate incomes of these areas and the damage caused by the tornado will make it very difficult to reverse the downward economic trend for the County. (Action Plan at 28).

3. While it is important to invest in the areas critically impacted by the tornadoes, there is concern that these investments are not considering the perpetuation of preexistent, incessant effects of racial segregation in Montgomery County communities.

Montgomery County residents, primarily people of color, still experience harm of being purposefully segregated into low opportunity areas. According to the AIMC, three of the 13 impediments listed deal directly with racial issues in the Dayton/Montgomery County area.

¹² 6.8% of students enrolled in Trotwood-Madison City school district experience homelessness. (Action Plan at 9).

¹³ Renters in the Trotwood-Madison City school district rank 20th in the state for school district where renter-occupied households are experiencing severe house cost burden (severe cost burden occurs when a family spending at least 50% of a household's income on rent and utilities). (Action Plan at 8).

¹⁴ The Trotwood area has a poverty rate is 25.6% with an average household income of \$32,977. (Action Plan at 19).

Specifically, impediment 5, 10, and 11. (AIMC at 171, 173). The Action Plan discusses the Analysis of Impediments for the entire state of Ohio, but not the localized analysis for Montgomery County. This is problematic because in terms of rural and urban areas, Ohio is a very diverse state. The statewide AI addresses many concerns more applicable to the rural areas of Ohio, which while important, do not speak to the experiences of those living in Montgomery County. While the issues addressed by the Action Plan are important, there are more pressing needs to address identified in the Montgomery County Analysis of Impediments, particularly, the persistence of racial segregation.

AI 5 for Montgomery County is “Race, Ethnicity, and Color.” According to the AIMC, “Racial segregation is a persistent impediment of fair housing in the region due to income disparity, dual housing markets, and continued steering in the real estate market based on color, race and ethnicity.” (AIMC at 171). There are areas in Montgomery County (in the City of Dayton) where 92% of the population is Black, and other areas (outside the City of Dayton) where 90% of the population is White, proving there is still ethnic and racial clustering in the region. (AIMC at 172). In a test determining favorable behaviors, 10 out of 14 times African American home seekers received less favorable treatment than White home seekers. (AIMC at 171).

AI 10 for Montgomery County is “Systemic Lending Issues.” The AIMC explains that lending institutions do not maintain and market foreclosed properties in neighborhoods of color to the same degree they do in White neighborhoods. This disparately affects large areas in the cities of Dayton and Trotwood as well as in Jefferson Township. (AIMC at 173). Of the nearly 7,000 abandoned properties in Montgomery County in 2015, most were older homes in low-income and minority neighborhoods. (AIMC at 173).

AI 11 for Montgomery County is “Industries that Interconnect with Residential Homeownership.” Impediment 11 clearly states “[d]iscriminatory practices in real estate, mortgage lending, residential appraisal, and homeowner insurance markets exist which limit housing choice and availability.” (AIMC at 173). To this day, real estate appraisers consider the racial composition of neighborhoods when appraising homes, appraising neighborhoods of color lower than white neighborhoods. (AIMC at 173). “Because most lending institutions will not issue mortgages for properties valued below \$50,000, low appraisals limit the ability to obtain mortgages in neighborhoods of color, preventing investment by owner-occupants, in particular minorities, because they have less access to capital than Whites. Properties in neighborhoods of color are instead available only to investors with sufficient cash or are left abandoned, contributing to neighborhood blight.” (AIMC at 173).

Areas of Montgomery County have faced racial segregation and economic disparity for nearly a century. As explained above, residents living in these low-opportunity areas are often trapped by the lack of available resources necessary to allow for economic growth. After the tornadoes ripped through these low-opportunity areas, the first inclination was to help restore those areas. While it is important to rebuild what was destroyed, the draft Action Plan shows that the authors do not fully comprehend the stark racial disparities in Montgomery County. It is insufficient to restore Montgomery County to the way it was prior to the tornadoes. The Action Plan must direct investments to ensure that affordable housing is available in well-resourced, high opportunity areas.

4. The State of Ohio and OHFA must develop affordable housing in well-resourced, high opportunity areas in Montgomery County, in order to provide residents with the opportunity to move to these areas.

“Opportunity is not something that an individual can possess; rather, it is something that a person can experience. . . . Because opportunity is a set of

conditions that people experience, housing and neighborhoods are at the forefront of most people's minds when considering relocation in opportunity-rich communities. . . . The American Dream combines the concepts of economic and social opportunity by describing an American culture that both is economic and fair; stable and inclusive.” (Action Plan at 59, 61).

Should the State of Ohio, OHFA, and the impacted jurisdictions exclusively fund the construction of affordable housing in areas that are low-opportunity, high poverty,¹⁵ and racially concentrated,¹⁶ the stark economic and racially segregated housing patterns in Montgomery County, Ohio will perpetuate.

The racist public policies of the early 1900s are the antithesis of national principles embodied in the federal Fair Housing Act. There is ample empirical data to prove it is not only inadequate, but also unacceptable to commit public funds to restoring Montgomery County back to its state of being prior to the tornadoes of Memorial Day weekend 2019. The State of Ohio, OHFA and local jurisdictions are compelled by the Fair Housing Act to affirmatively choose to build affordable housing in areas with less than 10% poverty and with populations of less than 25% Black.¹⁷ Doing so provides all people real equal housing opportunities, and enables them to move to areas that best meet their needs.

Conclusion

From the crisis of the 2019 Memorial Day tornados springs an opportunity for the State of Ohio, OHFA and the local jurisdictions to create real housing choice and begin to eliminate impediments to equal housing opportunity. Seizing this opportunity is incumbent upon the elected

¹⁵ Defined as areas where the poverty rate is more than 10%.

¹⁶ Defined as areas where 25% or more of the population is Black or African American.

¹⁷ See the attached reports by Abt on the OHFA LIHTC program.

officials, public officials, and employees of Montgomery County and the State of Ohio. Doing so will also make them the vanguard of their peers from across the nation.

The CDBG-DR Action Plan explains that “[t]he Disaster Recovery project will have significant, long-term economic benefits to the Miami Valley region[.]” (Action Plan at 40). If significant, long-term economic benefits are to be realized, the investment of these funds must be mindful of the historic bad public policy that created the economic and racial segregation imposed upon residents of Montgomery County over the past century. The solution is not to simply build more affordable housing in the communities most devastated by the tornadoes. These neighborhoods need investment in spheres of life like access to fresh food, quality schools, public transportation, and social services. Housing units (new and replacement) funded by the Action Plan cannot only be sited in the communities stricken by the tornadoes. Rather, housing units must be created in areas of low poverty and low racial concentrations. Anything different will not address the impediments to Fair Housing Choice chronicled in multiple Analyses of Impediments for Montgomery County, Ohio over the past thirty years. Instead, it will exacerbate the impediments the County has been promising the federal government it was working to eliminate for more than 30 years.

We hope our comments and suggestions are given due consideration before funding decisions are made. Thank you for your consideration and time.

CDBG-DR Certifications

Due to internal security protocols, CDBG-DR Certifications submitted separate from Amendment. See attached document.

SF-424

Due to internal security protocols, SF-424 submitted separate from Amendment. See attached document.

HUD Comments on Action Plan Submission #1:

Comment #	Action Item(s)	Status
GENERAL ACTION PLAN REQUIREMENTS		Page
C1	<i>Needs Assessment:</i> The Plans does not take into account the costs of incorporating mitigation and resiliency measures to protect against future hazards. Please included this information in the plan and provide where the information can be found.	Page 87- Planning
C2	<i>Connections between needs and connection of funds:</i> We did observe the reasons provided as to why the selected activities and programs were selected for CDBG-DR funding, however we are asking the state to make a concerted effort at explaining in more detail why these activities/programs are best for the residents of the area, and especially those that are identified as “vulnerable populations.” Please included this information in the plan and provide where the additional information can be found.	Page 79-83: Priorities for Funding Allocation
C3	<i>Rehab/Reconstruction of Public Housing, Affordable Housing, and other forms of assisted housing</i> The state provided the following: <i>Greater Dayton Premier Management (GDPM), the local public housing authority, did not experience major damage to its public housing units, other than power loss. Currently, the GDPM has two properties, with a combined total of approximately 85 units with outstanding damage from the tornadoes. GDPM plans to address the storm damage during rehabilitation to eliminate disruption to clients currently residing in the properties. The units that sustained damages were covered by insurance, however, GDPM will need additional capital funds as well as to complete the rehabilitation for both properties.</i> It appears that GDPM will need additional capital funds to finish rehabilitation of the properties. Has GDPM identified where this additional capital will come from? Please identify all available funding sources, including CDBG-DR that will be/can be utilized to meet this apparent unmet need. Please include this information in the plan and provide where the additional information can be found.	Page 40: Public Housing Authority- Due to timing, GDPM has proceeded with tornado damage repairs with insurance funds. Tornado damage was all exterior repairs- siding damage and porch posts. Now, GDPM is working with a developer on a competitive Housing Development Assistance Program application through Ohio Housing Finance Agency for the additional capital funds needed for the planned rehabilitation of these properties.

Comment #	Action Item(s)	Status
C4	<i>Rehab/Reconstruction of Public Housing, Affordable Housing, and other forms of assisted housing</i> We also observed that housing authorities are eligible to apply for rehab cost through the existing HDAP program. Please address will priority be given to PHAs. if so, in which ways, if not, was it considered? Please include this information in the plan and provide where the additional information can be found.	Page 89- HDAP Section- Eligible HDAP Developer Applicants: Clarified applicants are HDAP Developers.
C5	<i>Rehab/Reconstruction of Public Housing, Affordable Housing, and other forms of assisted housing</i> Are Dayton/Montgomery Co./Trotwood/ other local governments allocating resources to Public/Affordable/Assisted Housing in response to the disaster in the MID area? If so, list these fund/Uses and sources. Please include this information in the plan, and provide where the additional information can be found.	Page 107- Other Funding Sources Updated local government contributions and other funding sources.
C6	Please update the income limits on page 65.	Page 86: Eligible Activities- Removed the income table and just reference the most current income limits.
C7	<i>Promote Housing for vulnerable populations</i> HUD observed the conditions of vulnerable populations as indicated on pages 23-30, and community partners and stakeholders services provided in the MID area. However, we are asking ODSA to expand this response by providing how ODSA/ CDBG-DR awarded subgrantee will promote housing for these populations including the prevention of low-income individuals and families with children from becoming homeless, the elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents, as identified in 24 CFR 91.315(e). This will help to tie back the planned activities to the needs identified. Please include this information in the plan, and provide where the additional information can be found.	Page 94-96: Promotion and Marketing to Vulnerable Populations All OHFA-funded developments that utilize low-income housing tax credits (which will include the projects funded with CDBG-DR) are required to provide service coordination to the residents and as part of that, they are required to submit a supportive services plan (SSP) to OHFA when they begin leasing. They are also required to evidence the SSP and any change in the service coordinator each year with their Annual Owner Certification that is part of the LIHTC requirements. This is different from developing Permanent

Comment #	Action Item(s)	Status
		Supportive Housing, which has a significant number of unique requirements in terms of ownership, required target populations, and coordination with the applicable Continuum of Care. The CDBG-DR funds are not the best source for developing Permanent Supportive Housing due to these additional, specialized requirements and therefore will not be utilized for developing PSH. The CDBG-DR funds will, however, be utilized in conjunction with LIHTC, therefore developments funded through this activity will be required to provide service coordination to their resident population. The CDBG-DR funds will not be used for service coordination or costs of providing services. CDBG-DR funds will only be used for construction-related costs as described in III. Eligible Activities.
C8	<i>Promote Housing for vulnerable populations</i> Please submit proposed marketing plans for each program, or provide the framework for the proposed marketing plan including any targeting, criteria, project underwriting, and outreach and marketing efforts. Please include this information in the plan, and provide where the additional information can be found.	Single-Family Programs- Page 49: Individual and Household Recovery Page 80-83: Priorities for Funding Page 101: Applicant Criteria Multi-Family Program- Page 40: Vulnerable Populations Needs Post Disaster Page 94-96: Promotion and Marketing to Vulnerable Populations

Comment #	Action Item(s)	Status
C9	<i>Elevation Standards</i> Please provide an estimate of the average costs associated with elevating structures as noted in (83 FR 5850). It would also be helpful in knowing how the state determined these cost. This needs to be addressed in the actual submitted action plan. Please include this information in the plan, and provide where the additional information can be found.	Page 104: Home Elevation OCD and its subrecipients will adhere to the advanced elevation requirements established in paragraph B.32.e of section VI (83 FR 5861) by evaluating the costs associated with elevating structures on a case-by-case basis. The cost of elevation is site specific, and depends on site context, site accessibility, and the type and size of the structure. For reference, the Ohio Emergency Management Agency (OEMA) provided an estimate of the average costs associated with elevating structures based on recent data from Ottawa County, Ohio. Using a dataset composed of single family dwellings built between 1930 and 1969 on either slab or crawl space foundations, OEMA calculated an estimated average elevation cost of \$111,955. OCD and its subrecipients, in consultation with the Montgomery County Office of Emergency Management and/or the OEMA, will evaluate the cost-effectiveness of each proposed new construction, repair of substantial damage, or substantial improvement in the 100-year floodplain to determine if elevation or an alternative strategy is cost reasonable and consistent with the goals of the Montgomery

Comment #	Action Item(s)	Status
		County Natural Hazard Mitigation Plan.
C10	<i>Elevation Standards</i> It is understood that in the MID area there may not be a whole lot of elevation work. However, the plan does not describe how the State/ Subrecipient will document on a neighborhood or local government level that elevation, as opposed to alternative strategies, is cost reasonable to promote a community's long-term recovery. Please include this information in the plan, and provide where the additional information can be found.	Page 104: Home Elevation
C11	<i>Protection of People and Property; Construction Methods</i> While it is observed on page 66 that the state will promote sound and sustainable long term recovery planning, the plan does not address high winds, storm surges, and little in flooding. HUD is asking ODSA to expand its response in this area. Please also address enforcement standards already in place. Please expand discussion of the OEMA plan, identifying/highlighting some of the standards and enforcement mechanisms in the OEMA plan, especially in the MID area. How will/have MID areas used this plan? Do MID jurisdictions have their own hazard mitigation plan? Were CDBG-DR funds considered in development of this plan, or expanding its use?	Page 80-81: Planning

Comment #	Action Item(s)	Status
C12	<i>CDBG-DR Certifications:</i> HUD did not observe certifications for the State of Ohio CDBG-DR Action Plan. They will need to be executed and submitted prior to the Action plan approval. I suggest that the state follows the below link, go to the last tab (certifications), and use this document as a template for execution. Please attach the certification when resubmitting the plan. o 2018-2019 Events Management Capacity, Initial Action Plan, and AP Certifications Checklists (XLSX) § Note: this link will also take you to the review checklist HUD uses when reviewing the submitted Action plan	Page 115: CDBG-DR Certifications
C13	<i>SF-424:</i> HUD did not observe a submitted SF-424 for the State of Ohio CDBG-DR Action Plan. One will need to be executed and submitted prior to the Action plan approval. Please attach a properly executed SF-424 when resubmitting the plan. o The CFDA # for the state's allocated CDBG-DR grant is #14.228	Page 117: SF 424
PROJECTS AND ACTIVITIES Comments/discussion items		
C14	How did the state come to the decision to fund the home owner rehab program at 10% Vs the HDAP at 85%?	Page 79: Rationale for Distribution of Funding (Added as a new section)
C15	How was the cap of 65K for the rehab program developed? Is this adequate for the type of housing needed?	Page 99- Owner Rehab- last paragraph Increased to \$100,000 gives room for flexibility and cost increases. Resource table allows for lower costs.
GRANTS MANAGEMENT AND BUDGET		
C16	<i>Cost Verification:</i> The plan does not describe the state controls for assuring that construction costs are reasonable and consistent with market costs at the time and place of construction. The Action Plan must address controls for housing projects involving eight or more units. How will underwriting standards ensure this? Please include this information in the plan, and provide where the additional information can be found. Note: The state's response on page 79 was observed.	Page 92: (HDAP) Financial Review Page 101: (Single Family) Cost Verification Page 105: Cost Reasonableness/Effectiveness

Comment #	Action Item(s)	Status
C17	<i>Program Income:</i> The notice referenced in the plan is not the notice that this allocation is funded under, please update the notice number, review requirements under the awarded notice, and update the PI section accordingly . Please include this information in the plan, and provide where the additional information can be found	Page 109: Program Income Updated and deleted incorrect reference.
C18	<i>Program Income:</i> Please expand/clarify use of PI returned or retained. How will it be used more specifically then what is referenced on page 82.	Page 109: Program Income
C19	<i>Application Status:</i> HUD did not observe policies and procedures to ensure the accessibility and privacy of individual applicant information. Understandably subrecipients will carry out direct program execution with beneficiaries, however please provide the standards that will be imposed dealing with the accessibility and privacy of individual applicant information . Please include this information in the plan, and provide where the additional information can be found.	Page 94- Applicant Status
FAIR HOUSING and EEO Comments on Action Plan		

Comment #	Action Item(s)	Status
DC1	1) the grantee did not provide demographic information on other protected classes, such as persons of Hispanic ethnicity, persons with disabilities, families with children, or limited English proficiency (LEP) populations in its impacted areas. In order to assess how planning decisions may affect protected groups, it would be useful for the grantee to provide demographic data noting the protected populations in its MID area (i.e., Montgomery County), as well as any racially and ethnically concentrated areas and concentrated areas of poverty in the MID area. The State may also consider what is the best representation of its MID area. In some cases, this data may best be represented at the census tract or neighborhood level as opposed to the county level. 2) In order to meet this FRN requirement, the grantee may analyze this demographic data in light of its planning decisions to determine the impact that its CDBG-DR programs and activities will have on protected classes, racially/ethnically concentrated areas, and concentrated areas of poverty. Specifically, it would be useful for the grantee to demonstrate the connections between its proposed CDBG-DR program and activities and funding allocations and its ability to meet the disaster recovery needs of protected groups, racially/ethnically concentrated areas and concentrated areas of poverty.	Pages 33-38: New Maps added for Persons of Hispanic ethnicity, persons with disabilities, families with children, number of households with children and limited English proficiency (LEP) populations in Montgomery County. Page 79-83: Priorities for Funding Allocation conclusion.
DC2	Page 79, Section 8 Tenants and Housing Needs of Persons that are Homeless Per 83 FR 5850, we recommend revising this section to include a description of activities the State plans to implement in order to address needs in the following areas: transitional housing, permanent supportive housing, and permanent housing needs of individuals and families (including subpopulations) that are homeless and at-risk of homelessness.	Now page 102. However, added info regarding current programs on Page 27: Housing Impact for Vulnerable Populations-Homeless/Transitional Housing Page 94-96- Promotion and Marketing to Vulnerable Populations (for the HDAP Program).

Comment #	Action Item(s)	Status
DC3	The grantee must note in its revised CDBG-DR AP steps taken to ensure that the AP was made available in an accessible format to persons with disabilities, in accordance with the requirements of Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act.	Page 108- Added Accessibility & Section 508 complaint. Action Plan and website will be accessible.
AC1	Page 15-16, Infrastructure Impact We note that the State reported using Federal funds for demolition and other storm recovery activities. We recommend that this section include a discussion of the implications of these activities as they apply to the overall needs assessment and action planning – e.g., impact of housing demolition on protected populations.	Now Page 17- Additional information included.
AC2	Page 24, Homeless/Traditional Housing This section notes that “several supported living settings,” which support persons with disabilities, were damaged. We recommend that the grantee provide additional information on the extent of this damage including a quantitative assessment of the unmet need to rehabilitate these living settings.	Page 26-27: Extent of damages and unmet need addressed.
AC3	Page 28 - Elderly and Low- and Moderate-Income Populations. We recommend expanding this section to include an estimation of the housing need among elderly persons and low- and moderate-income persons, including figures on the types of housing. Ideally, there would be an estimate of the number of elderly and low- and moderate- income persons whose housing was damaged or destroyed by the tornados.	Now Page 39-40 inserted household data from case management system.-Also see (page 69) Unmet Housing Needs of Vulnerable Populations.
AC4	Page 42, State of Ohio Fair Housing, Lack of Available Affordable Housing Units for Persons with Disabilities We recommend expanding this section by identifying the particular HUD program that provided \$11.9 for rental housing assistance, as well as the number of accessible units to be developed. In addition, the second bullet should note that the rental housing assistance described therein are subject to the applicable accessibility authorities such as, Section 504 and UFAS.	Page 55-61- Replaced this section with impediments from 2020 AI. At the time of submission, the 2015 was the approved Ohio AI. It has been updated with the most current HUD approved Ohio AI.

Comment #	Action Item(s)	Status
AC5	Page 42, State of Ohio Fair Housing, Reference to <i>Olmstead</i> This section of the AP states: “In response to the <i>Olmstead</i> decision, Ohio’s FY 2014 Consolidated Plan (p. 122-123) encourages <i>universal design</i> [emphasis added] as an objective to meet the needs of the disabled by developing housing to serve those with developmental disabilities, severe and persistent mental illness or mobility/sensory impairments.” We note that universal design is not a requirement under <i>Olmstead</i> . <i>Olmstead</i> addresses the availability of community-based housing opportunities for persons with a disability, which would include the availability of housing that meets <i>accessibility standards</i> . We recommend revising this section based upon this context.	Page 55-61- Replaced this section with impediments from 2020 AI. At the time of submission, the 2015 was the approved Ohio AI. It has been updated with the most current HUD approved Ohio AI.
AC6	Pages 47, Housing We recommend that the grantee consider adding a definition for inaccessible housing to Exhibit 2-4.	Completed. Page 21.
AC7	Page 49, Unmet Housing Needs This section notes the unmet housing needs in the State’s MID areas. We recommend expanding this section to include the quantitative assessments of the unmet housing needs of all protected groups under the Fair Housing Act (FHA) – e.g., families with children; families with a person with a disability; as well as vulnerable populations such as persons and families experiencing homelessness, and very low-income public and assisted housing residents. NOTE: Families with a person over 60 does not meet the definition of a protected class under the FHA.	Now Page 69: Unmet Housing Needs of FHA Protected Groups- Inserted as a new Section:
AC8	Page 54, Application Process We recommend that the AP explicitly specify the criteria for determining eligible subrecipients in this section.	Now Page 73: Application Process- updated.
AC9	Page 58, Section 3 and FHEO. We recommend that this section be expanded to include guidance on how Section 3 will be administered in the context of the CDBG-DR-funded programs in Montgomery County.	Response: Section 3 provisions will be included in grant agreements with subrecipients (i.e. OHFA and the County) and that administration and data collection will be incorporated into our policies and procedures

Comment #	Action Item(s)	Status
AC10	Page 64, CDBG-DR National Program Objectives This section should replace the term “HUD national objectives” with the “Housing and Community Development Act national objectives” In addition, the State should consider expanding this section to reflect that slum and blight clearance and addressing urgent needs are also national objectives under CDBG.	Page 85- Inserted "Housing and Community Development Act national objectives," and expanded the section to include other national objectives.
AC11	Page 67-68, Eligible Applicants We recommend that the State review the AP and clarify the range of eligible subrecipient applicants. The Eligible Applicants section specifies for-profit, non-profit, and PHA applicants. Elsewhere in the draft AP, there are references to local government subrecipients. Revisions need to be made to clarify the type of entity that can be an applicant or subrecipient.	Updated Eligible Applicants language to clarify applicants will be Developers for Multifamily Housing. Now page 89- Eligible Applicants
AC12	Page 70, Funding Considerations We recommend revising the competitive criteria for rating and ranking applications through the following: 1) Incorporate a specific measures into the rating system and define them; 2) Utilize a consistent point-based indication rating system as is often employed with competitive criteria such as these; 3) Define terms such as “location of development” and “leveraging other funding sources,” such as by specifying how different ranges of leverage will be rated; 4) Specify to what extent projects must serve persons in particular groups or whether ratings will be assigned based on the target population groups or the percentage or number of units set aside for persons in such groups.	Page 91: Application Review and Criteria and Process updated and expanded.

Comment #	Action Item(s)	Status
AC13	Page 71, Development Standards Page 73, Owner Rehabilitation We recommend that the State review and specify its accessibility standards in light of the requirements 83 FR 5850. If inconsistencies exist, the State should revise its AP to follow the provision. Specifically, the passage on Page 73 should also be revised in light of 83 FR 5850, namely “Grantees are reminded that the use of recovery 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.” We recommend deleting the phrase “more accessible for the elderly or persons with special needs” from the passage and replacing it with “accessible in accordance with Section 504, as well as meeting the functional needs of residents in socially vulnerable populations.”	Page 97: Development Standards- updated Page 98- Owner Rehabilitation Updated

Comment #	Action Item(s)	Status
AC14	Page 74, Owner Home Repair The draft plan states: “Accessibility: This type of work involves utilizing measures designed to improve access and mobility for occupants who are physically disabled or infirm. Generally, these measures include exterior ramps, grab bars and specialized bathroom fixtures. In some cases, more extensive work is required to remove architectural barriers, widen doorways, lower cabinets, or remodel bathrooms to meet household needs. The work completed to improve accessibility must meet or exceed the design and installation standards outlined in the Uniform Federal Accessibility Standards (UFAS).” We recommend that the State review the accessibility standards in its AP 83 FR 5850 and make necessary revisions to the AP’s references to accessibility standards. While conducting its re revision, the grantee should consult the 2010 ADA Standards for Accessible Design under Title II of the ADA as well as those published in the Federal Register on May 23, 2014, otherwise known as the “Deeming Notice.” Further information may be found here: https://www.hud.gov/program_offices/fair_housing_equal_opp/physical_accessibility	Page 99- Owner Home Repair This level of detail has been removed from the Action Plan and will be corrected addresses as HUD suggested in the Program Policy and Procedure Manual.
AC15	Pages 74-75, Lead-based Paint We recommend that this section reflect the official title of this HUD guidance: “Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Second Edition, July, 2012.”	Page 99- Owner Home Repair This level of detail has been removed from the Action Plan and will be corrected addresses as HUD suggested in the Program Policy and Procedure Manual.

Comment #	Action Item(s)	Status
AC16	Page 75, Temporary Relocation. We recommend that the State revise this section by adding a reference to the February 2018 notice with respect to relocation requirements – e.g., “in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601 et seq.) (“URA”) and section 104(d) of the Housing and Community Development Act (42 U.S.C. 5304(d))(Section 104(d)), as well as the implementing regulations for the URA at 49 CFR part 24 and the regulations for section 104(d) at 24 CFR part 42, subpart C.”	Page 102: Temporary Relocation- updated
AC17	Page 78, Protection of People and Property: Construction Methods Page 78, Home Elevation We recommend that the bullet list of requirements include the accessibility requirements of the Fair Housing Act, Section 504, and Titles II and III of the ADA 83 FR 5850. Furthermore, we highly recommend that the grantee include direction on accessibility of elevated homes. The direction may reflect the checklist of accessibility requirements in 83 FR 5850.	Page 104- added bullet point: "Construction will comply with the accessibility requirements of the Fair Housing Act, Section 504, and Titles II and III of the ADA." Page 104- Home Elevation: Added “Any elevation construction will comply with the accessibility requirements of the Fair Housing Act, Section 504, and Titles II and III of the ADA in the elevation section. Elevation activities and eligible costs will be further defined in the program guidelines."
AC18	Pages 82-83. Anti-Displacement The draft plan fails to describe how the State plans to minimize displacement as required by the 2018 CDBG-DR Notice at 83 FR 5850. Furthermore, the plan would benefit from more detail on how the State will assisted displaced persons or require this of subrecipients.	OHFA's URA documents here: https://ohiohome.org/ppd/resources.aspx Page 110-111: Anti-Displacement- updated.
AC19	Page 81, Citizen Participation – Outreach Efforts. In conjunction with the Ohio Housing Finance Agency the State met with local officials of the most impacted and distressed (MID) areas to discuss unmet needs and to solicit comments on the AP. It would be informative for the AP to provide information on outreach efforts and the steps taken to reach impacted citizens, including LMI persons, racial/ethnic minorities, persons with disabilities, and other vulnerable populations.	Page 108- Added additional information

Comment #	Action Item(s)	Status
AC20	Page 85, Citizen Participation – Outreach Efforts. In addition to the elements noted in Disapproval Comment 1, the State should provide a response to the public comments from Advocates for Basic Legal Equality and the Miami Valley Fair Housing Center.	<u>Response was provided in document:</u> "Upon approval of the plan, OHFA will begin to develop a Request for Proposals (RFP) with competitive criteria similar to that which is included in their Qualified Allocation Plan (QAP) and their Bond Gap Financing (BGF) guidelines. As noted in the plan, the State of Ohio has the discretion to expand the target area to include the entirety of Montgomery County and intends to do so. OHFA will consider inclusion of competitive criteria or incentives to develop in areas with less than 10% poverty, and/or less than 25% racial concentration, and/or in areas of High and Very High Opportunity according to OHFA's USR Opportunity Index, developed in partnership with The Ohio State University's Kirwan Institute for the Study of Race and Ethnicity."

Public Comments on Substantial Amendment #1

The Office of Community Development held the 30-day public comment period beginning April 16, 2021, along with a virtual Public Hearing that was held via WebEx on May 5, 2021. All information that was made available for public viewing and comment along with the memo announcing these opportunities was posted on the Development website at https://development.ohio.gov/cs/cs_cdbg-dr.htm

Development did not receive any official public comments regarding the Draft PY 2020 CDBG-DR Action Plan First Amendment but did receive a **request for clarification about the single-family programs Information about the Pathways to Homeownership, a new construction and homeownership assistance program, can be found starting on page 97.**

References

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