



**Department of  
Development**

# **State of Ohio CDBG-Disaster Recovery Action Plan**

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**Logan County**

Version: 1.0

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Prepared By:

Ohio Department of Development

Community Services Division

Office of Housing Support

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Version (Date)	Summary of Changes Made
Version 1 (Month Day, Year)	Action Plan Approved by HUD.

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## Executive Summary

On Thursday, March 14, 2024, 11 tornadoes carved paths of destruction across eastern Indiana and Western and Central Ohio, resulting in four fatalities and 68 injuries. Two tornadoes were rated as intense EF-3s and were responsible for all of the fatalities. The cause of most of these tornadoes were two supercell thunderstorms that formed in central Indiana and moved eastward. The first, located further north, produced five tornadoes during its more than 120-mile path from Adams County, Indiana to Licking County, Ohio. The second storm, situated further south, produced two tornadoes along its more than 75-mile path from Delaware County, Indiana to Miami County, Ohio. In addition, two other cyclic thunderstorms produced a combined three tornadoes in northern Ohio from this event.

Logan County was impacted by an EF3 Tornado entering from Auglaize County and sweeping a path 8/10ths of a mile wide across the Village of Lakeview, parts of Stokes and Washington Township, and through the Village of Russell's Point. Three of the four confirmed fatalities occurred in Lakeview with 27 injured. Widespread damage affected over 1,500 properties and businesses, with at least 239 homes destroyed.



*Figure 1: leveled Lakeview cottages photo from Sidney Daily News on March 15, 2024*

Emergency response and damage assessments were conducted over the first 30 days, with Emergency Declarations issued by the County Commissioners and Ohio Governor, including public assistance through the State Disaster Relief Program. A Presidential Disaster Declaration authorizing Federal Emergency Management Agency (FEMA) Individual Assistance was approved on May 2, 2024, as DR#4777-OH. The federal declaration provided grant assistance to individuals and families and access to the Small Business Administration loan programs.

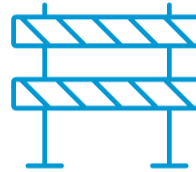
# Storm Impact



11 Tornadoes



Nearly 1,200 homes damaged



Over 300 homes with major damage or destroyed



Nearly 90 businesses damaged



The U.S. Department of Housing and Urban Development (HUD) announced that the State of Ohio will receive \$14,116,000 in funding to support long-term recovery efforts following Ohio Tornadoes DR-4777-OH through the Ohio Department of Development. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet need in the State of Ohio

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. HUD has allocated \$14,116,000 in CDBG-DR funds to the State of Ohio in response to the Ohio Tornadoes DR-4777-OH, through the publication of the Federal Register 90 FR 4760. This allocation was made available through the Extending Government Funding and Delivering Emergency Assistance Act (division B of Pub. L. 117-43).

## Draft Proposed Program Budget

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
<b>Administration</b>	\$705,800	5%			
<b>Planning</b>	\$1,000,000	7.1%	0		
<b>Housing</b>	\$6,295,680	44.6%	60%	100%	70%
<b>Infrastructure</b>	\$3,997,120	28.3%	40%	100%	70%
<b>Mitigation Set-Aside</b>	\$2,117,400	15% <sup>1</sup>	100%	100%	70%
<b>Total</b>	\$14,116,000	100%	100%	95%	70%
<b>% of Total</b>	100	100	15	95 <sup>2</sup>	70 <sup>3</sup>

### Part 1: Assessing the Current Situation

Pre-Disaster Conditions

County Information



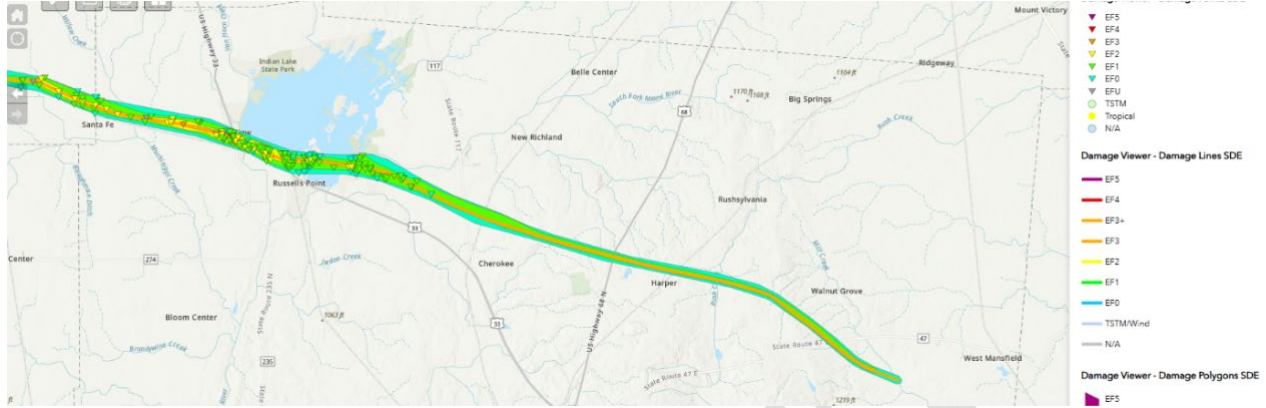
Logan County, Ohio

<sup>1</sup> At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster.

<sup>2</sup> Grantees are required to spend a minimum of 80% of their funds in the HUD identified MID areas.

<sup>3</sup> Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries.

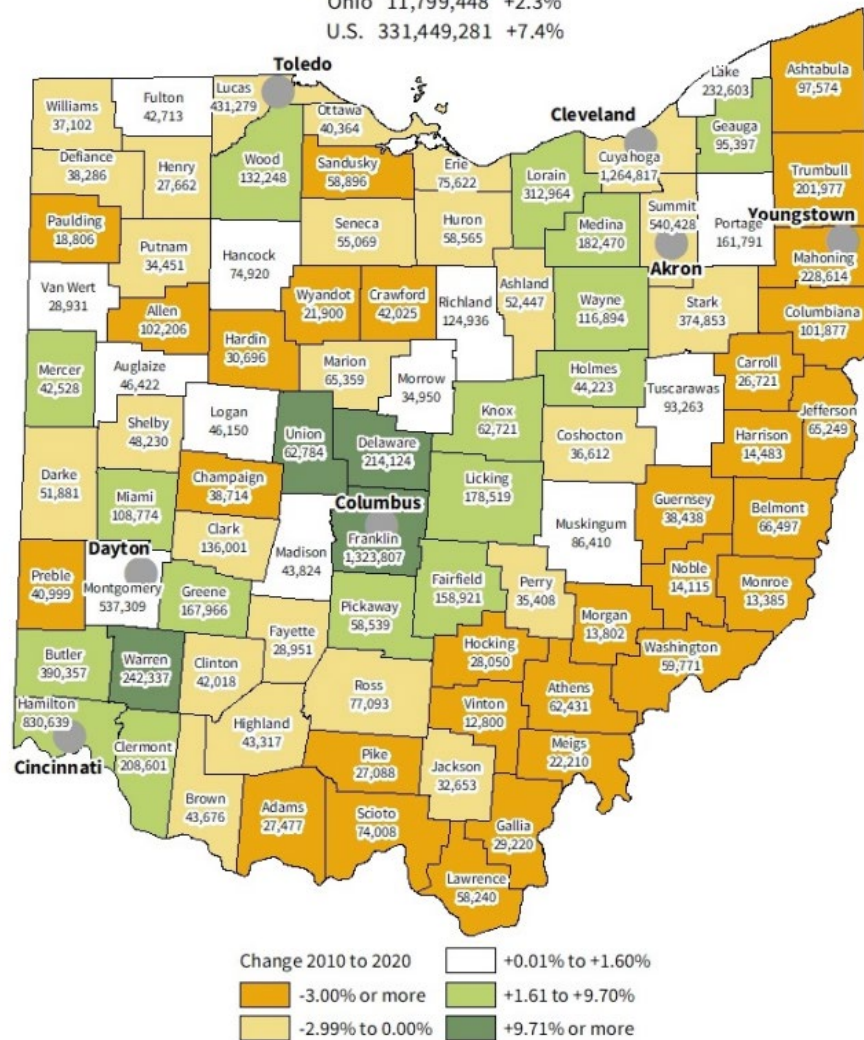
Logan County is in Northwest Ohio. It has the 53<sup>rd</sup> largest population of the 88 counties in Ohio, with approximately 46,047 people, spanning 459 square miles. Bellefontaine is the largest city and the county seat. Logan County is also home to a popular recreation destination, Indian Lake, which boasts a robust summer tourism sector and vacation destination for others in the region.



The median age in Logan County is 42 years and the racial composition is 92% White, 3% multiracial, 2% Black, 1% Asian, and 2% other.

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2020 Population and Change Since 2010  
 Ohio 11,799,448 +2.3%  
 U.S. 331,449,281 +7.4%



### Income, Poverty, and Property

The predominant industry in Logan County is manufacturing, making up 26.3% of all jobs, with healthcare, social assistance, and retail being the next most prominent industries. The average salary in Logan County is between \$40,000-50,000.

11.3% of individuals in Logan County live below the poverty line, a number that is lower than the national average of 12.4%. The largest demographic living in poverty are Females 18 - 24, followed by Females 25 - 34 and then Females 35 - 44. 15% of children were living in poverty in Logan County. The most common racial or ethnic group living below the poverty line in Logan County, OH is White, followed by multiracial and Black.

Logan County has a homeownership rate of 78%, with only 22% renters. The average rent for an apartment in Logan County is \$1,187. The average home value in Logan County is \$235,537, up 7% over the past year. The median listing home price is \$269,500, up 12% year over year. 11% of the population of Logan County lives with severe housing problems or are deemed housing insecure.

## Education and Employment

93% of individuals over 25 in Logan County have a high school diploma and nearly 20% of individuals over 25 hold a bachelor's degree or higher. Logan County is home to 13 school districts and career centers. The Bellefontaine location of Clark State Community College is located centrally in Logan County and Hocking College has a Logan Educational Site as well.

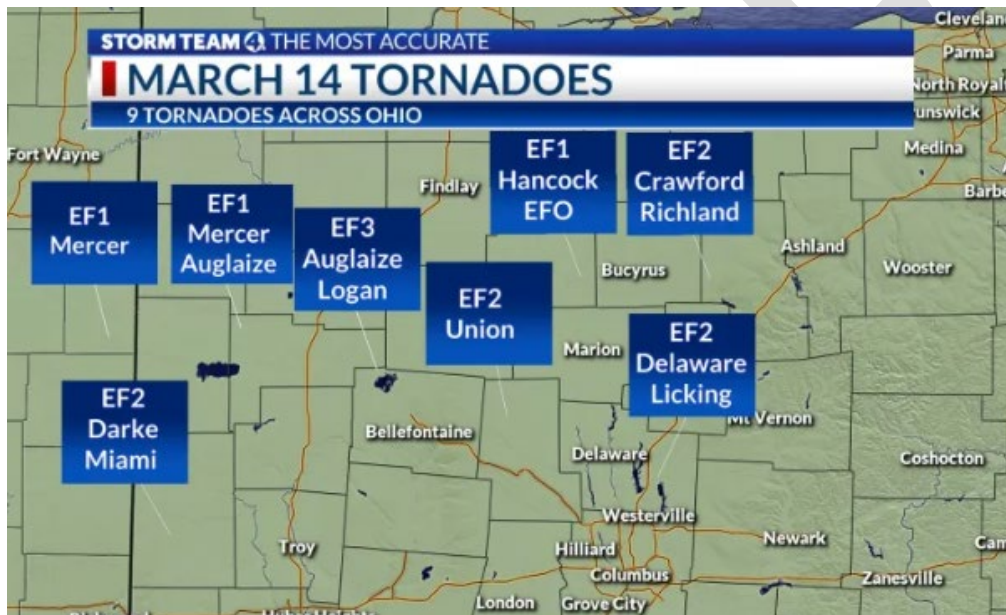
Logan County's unemployment rate is 4.9%, up slightly from 4.2% before the disaster. The employment sector continues to grow slowly, growing 0.4% between 2022 and 2023.

## Plans and Needs

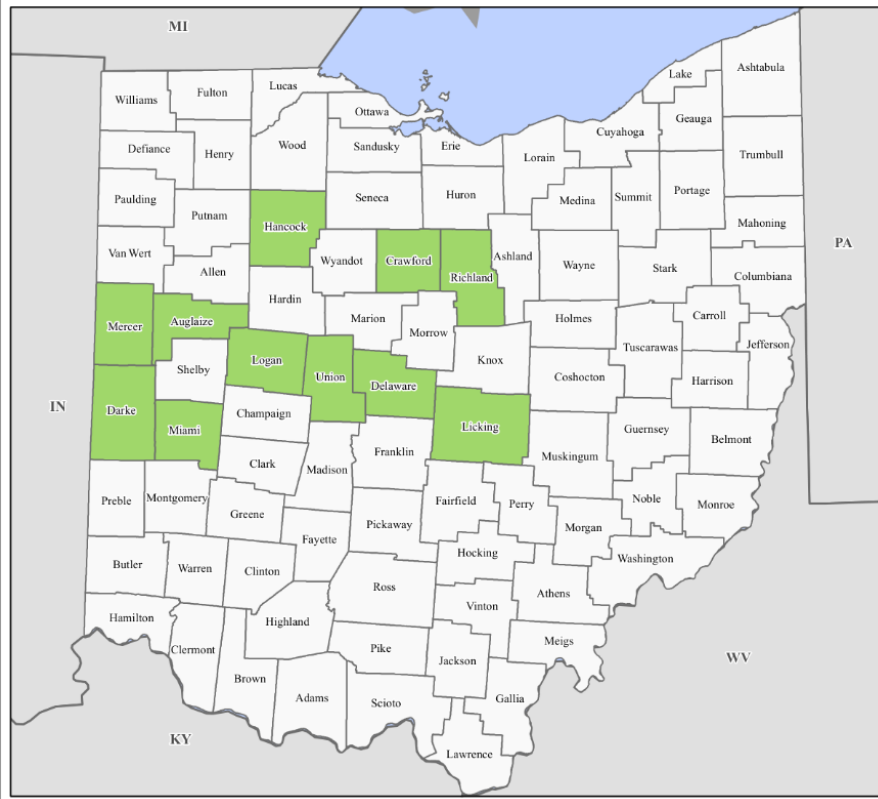
Directly following the disaster, a group called the Logan County Community Recovery Committee met at the request of the Logan County Emergency Management Agency Director. The mission of the committee was to create a plan for long-term recovery of the larger community and protect the most valuable assets, the people of Logan County.

This committee created several subcommittees, including subcommittees on housing, infrastructure, communications, business and economic recovery, transportation, and long-term recovery. After hosting several community listening sessions and open houses, the committee generated a Long-Term Recovery Plan for Logan County.

## Post-Disaster Conditions



**FEMA-4777-DR, Ohio Disaster Declaration as of 05/02/2024**



**Data Layer/Map Description:**  
The types of assistance that have been designated for selected areas in the State of Ohio.

All areas in the State of Ohio are eligible for assistance under the Hazard Mitigation Grant Program.

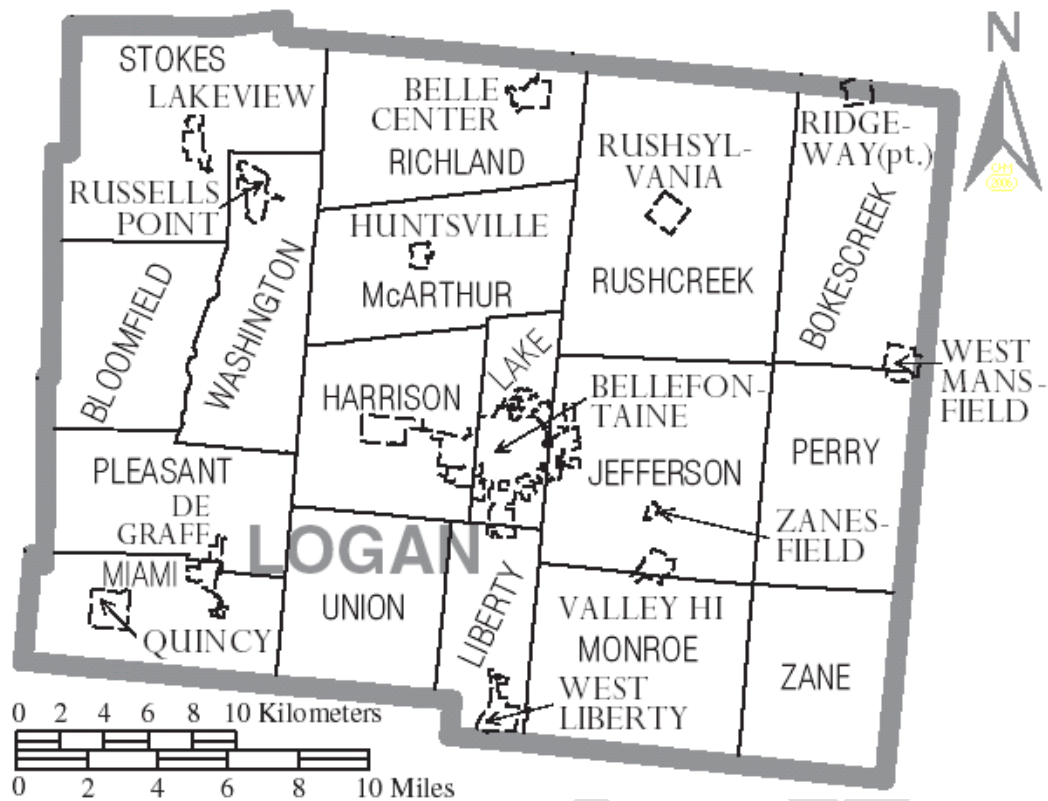
**Designated Counties**

- No Designation
- Individual Assistance

**Data Sources:**  
FEMA, ESRI;  
Initial Declaration: 05/02/2024  
Disaster Federal Registry Notice: 05/02/2024  
Datum: North American 1983  
Projection: Lambert Conformal Conic

**Business and Economic Impact**

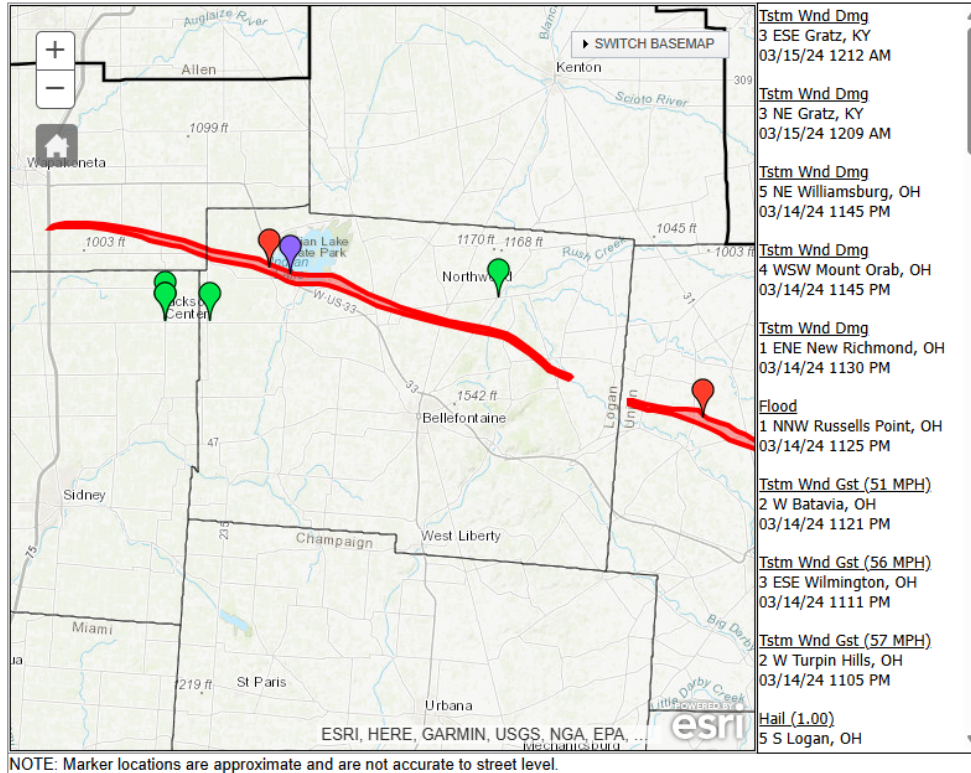
The disaster directly impacted economically distressed areas within Logan County, including Stokes, Washington, and Richland Townships and the cities of Lakeview and Russell’s Point. As of April 2025, Logan County had identified 22 businesses that were destroyed, 24 businesses that sustained major damage, 12 that sustained minor damage, eight that were affected and 17 that were not affected, for a total of 83 businesses surveyed.



### Infrastructure Impact



Several instances were reported across Logan County of downed trees and power lines, causing a massive loss of electricity across the county. Additionally, flooding reports in Richland and Stokes Township resulted in closed roadways in the direct aftermath of the event.



## Housing Impact

While Ohio still awaits the data from HUD and FEMA on the Joint Damage Assessment, preliminary data was made available to the public as part of Governor Mike DeWine’s Disaster Declaration Request in late March 2024. The initial number of residences impacted was noted at 1,138, with 174 being destroyed, 175 sustaining major damage, 536 sustaining minor damage, and 253 affected.

Of those impacted, 56% of property owners were insured, 9% were in poverty, and 74% were owner-occupied units. 17% of impacted units were home to individuals aged 65 and older, while 24% were home to those under 18 and 13% were home to those with a disability.

As of April 2025, Logan County officials have the count of residential properties impacted at 1,184, with 235 being destroyed, 253 facing major damage, 417 with minor damage, and 279 affected. Logan County noted that 352 of the residences identified during the damage assessment process were not primary residences, largely due to the camping/tourism/vacation industry in the region.

## Recovery Efforts

### Short-Term Recovery

Emergency response and damage assessment were conducted over the first 30 days, with Emergency Declarations issued by the County Commissioners and Ohio Governor, including public assistance through the State Disaster Relief Program. A Presidential Disaster Declaration authorizing Federal Emergency Management Agency (FEMA) Individual Assistance was approved on May 2, 2024, as

DR#4777-OH. The federal declaration provided grant assistance to individuals and families and access to the Small Business Administration loan programs.

The Logan County Community Recovery Committee (CRC) was convened on April 15th, 2024, at the request of the Logan County EMA Director. The mission of the CRC was to create a plan for the long term recovery of the larger community, and protect our most valuable assets, our people.

The Community Recovery Committee began by assessing the status of recovery so far, including what had been accomplished, and what remained to be done. They reviewed the process of Community Recovery Planning used by FEMA and other communities after disasters, and discussed the organization of the committee, including areas of focus, leadership, and management. They designated the sub-committees to address planning for the most critical areas of recovery and scheduled the next meetings.

The sub-committees established included: Housing, Infrastructure, Business & Economic Recovery, Communications, Long Term Recovery, Transportation, and Miscellaneous Concerns. The sub-committees each established a schedule and began to gather ideas and implement the most immediately beneficial programs. Their findings and recommendations gravitated toward short-term and long-term projects. For planning purposes, the short term was defined as to be done within six to 18 months, whereas long term projects would require 18 months or longer.

The Community Recovery Committee hosted an Open House on May 2nd to receive public input including concerns, needs, and visions for the future of the area after recovery. The open house was promoted using radio stations, a special distribution of the Bellefontaine Examiner, social media, and printed flyers. The high attendance count was 144 people, with every committee receiving multiple comments and requests from the community.

Following the open house, each sub-committee received the comments submitted by the public. They proceeded to evaluate the comments and requests and group like topics together, establish a priority, identify how feasible each request was, and come up with a recommendation for how to proceed. The requests were then designated by which organization or agency would have primary responsibility for moving them forward.

The sub-committees created draft plans and presented them back to the full Community Recovery Committee over the course of several weeks. Adjustments were made and additional plans were developed based on feedback from the CRC members.

Finally, the CRC held a second public open house on June 20th to provide the results of the committee's work and allow for public comments and feedback on the direction of the plan. Attendance was lighter for the second open house, with only 17 people signing in. Written comment forms were provided for feedback on the draft plans; only one form was submitted.

The next steps included final edits of the Logan County Community Recovery Plan, submission for review and adoption, and implementation of the plan strategies.

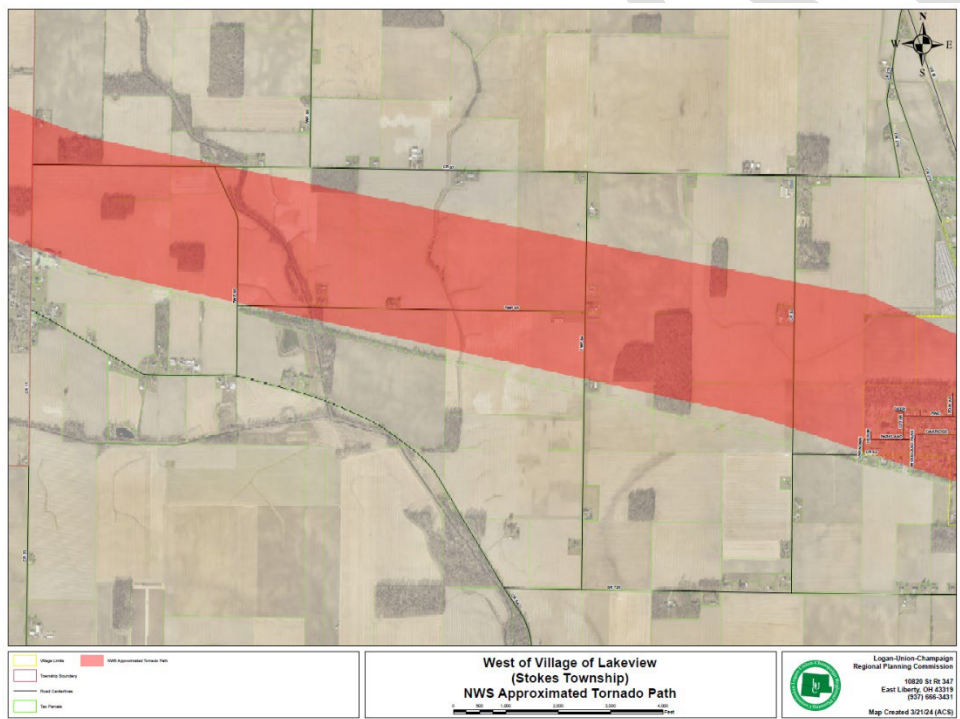
### Long-Term Recovery Efforts

The Logan County Long Term Recovery (LTR) Team is a standing group that was originally formed after a flood in 2011. The LTR Team is made up of a core group and has an established process for activation, conducting casework of damaged properties, and review of identified needs. The LTR Team seeks assistance from local vendors and churches, and funding through local/state donations and grants, and works closely with members of Ohio Voluntary Organizations Active in Disaster (VOAD).

In the short term, the LTR Team contacts affected individuals and families to assess their recovery status and completes casework for any who may not be able to recover on their own or through other means. The Casework Chair leads this, and a team of volunteer case workers meet with the clients and compile information on the family structure and needs.

In the long term, the LTR reviews and approves needs, and then provides referrals to local agencies, connects donated resources, or purchases the needed items or services to assist clients in getting back on their feet and living in a sustainable way. The LTR also assists in finding affordable housing for those in need of permanent placement and assigns voluntary skilled labor teams to assist in repair and rebuilding. In this case, the volunteer assistance will allow FEMA payments to provide the maximum benefit.

The LTR team's work will continue until they have assisted to the best of their ability and closed each case. As of April 2025, 97 individuals were referred to LTR and 75 of those cases have closed, 14 are in process, and 8 are experiencing barriers to progress.



*NWS Tornado Path*



*Logan County – Indian Lake damage*

### Most Impacted and Distressed Areas

#### HUD identified MID Areas

Logan County was identified by FEMA as the Most Impacted and Distressed (MID) Area for DR-4777. The county sustained significant damage during the tornado event and still has several areas of unmet needs, focused on the areas of housing and infrastructure.

#### Housing

With 1,184 residential structures experiencing some level of damage, over 250 of those being completely destroyed, housing remains a critical unmet need for Logan County. Some of the worst destruction occurred when a mobile home park at Indian Village was completely destroyed, along with numerous individuals homes throughout the county. This demonstrates the great need for housing, especially housing for low-and-moderate income (LMI) residents.

#### Infrastructure

While some of the damaged utilities have since been repaired with regular operating systems restored, any new housing developed to meet the needs of the community will require connection to the utility system. The most cost prohibitive utility is water and sewer systems that will need to be extended to serve new residential development.

## Overview of the Impacts of the Qualifying Disaster

The state of Ohio has submitted a request to the HUD office in charge of coordinating data collection with FEMA for disaster 4777 and has yet to hear back. This section will be updated once that data is received.

**Table X: Disaster Overview**

Disaster Summary	
<b>Qualifying Disaster:</b>	Ohio Tornadoes DR-4777-OH
<b>HUD-identified MID Areas:</b>	Logan County

**Table X: CDBG-DR Allocation Overview**

CDBG-DR Allocation Overview:	
<b>CDBG-DR Allocation:</b>	\$11,998,600
<b>CDBG-DR Mitigation Set Aside:</b>	\$2,117,400
<b>Total Allocation:</b>	\$14,116,000

## Unmet Needs and Mitigation Needs Summary

**Table X: Unmet Needs and Proposed Allocations**

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
<b>Administration</b>	<b>\$705,800</b>	<b>5%</b>			
<b>Planning</b>	\$1,000,000	7.1%	0		
<b>Housing</b>	\$6,295,680	44.6%	60%	100%	70%
<b>Infrastructure</b>	\$3,997,120	28.3%	40%	100%	70%
<b>CDBG-DR Mitigation Set-Aside</b>	\$2,117,400	15% <sup>4</sup>	100%	100%	70%
<b>Total</b>	<b>\$14,116,000</b>	<b>100%</b>	<b>100%</b>	<b>95%</b>	<b>70%</b>
<b>% of Total</b>	<b>100</b>	<b>100</b>	<b>15</b>	<b>95<sup>5</sup></b>	<b>70<sup>6</sup></b>

<sup>4</sup> At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster.

<sup>5</sup> Grantees are required to spend a minimum of 80% of their funds in the HUD identified MID areas.

<sup>6</sup> Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries.

## Part 2: Estimating Unmet Needs

### Unmet Needs Assessment

The state of Ohio has submitted a request to the HUD office in charge of coordinating data collection with FEMA for disaster 4777 and has yet to hear back. This section will be updated once that data is received.

## 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 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.

### Preliminary Program Design

Development has developed a Method of Distribution (MOD) based action plan for this grant that focuses primarily on the affordable housing shortage and infrastructure needs in the Indian Lake area in Logan County, the area most impacted by the storms. To best meet the disaster recovery needs of the area, the Habitat for Humanity of Logan County is a development agency and long-time affordable housing development partner that will receive funds to create single-family housing, acting as a subgrantee.

Additionally, Development will allocate a portion of the CDBG-DR for multifamily rental home development. The initial proposed project is for the Metropolitan Housing Authority (MHA) to utilize a small portion of the multifamily allocation of the CDBG-DR funds as leverage to apply for a 4% LIHTC credit through the Ohio Housing Finance Agency (OHFA). This project will provide LMI housing at a fraction of the cost it would take to take on the full development costs of a multifamily unit with CDBG-DR funds. Logan County Commissioners is the other subgrantee for this activity and will host proper Request for Proposals (RFP) and procurement to implement the remaining multifamily rental housing funds.

The Logan County Commissioners will also serve as the subgrantee for the oversight and implementation of the infrastructure projects identified as a need within Logan County's various impacted neighborhoods. This portion of the funding will connect existing utilities, especially water and sewer systems, with any new properties being developed or existing properties needing better access to those systems.

Lastly, the Logan County Land Bank will assist with the demolition of currently destroyed/damaged properties that have been included in the damage assessment from the tornado event and will ensure those properties are safely removed for future development.

## Application Process

Upon executing the CDBG-DR grant agreement with HUD, Development will grant funds to Habitat for Humanity of Logan County, the Logan County Land Bank, the Logan County Metropolitan Housing Authority, and the County Commissioners of Logan County.

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

As a MOD implementation, Development's application did not include submitting individual applicant information. All data requested and submitted will be aggregate community-level data. Information on the breakdown of staff responsibilities can be found in the Implementation Plan.

Habitat for Humanity of Logan County will utilize their online system to accept applicants for single-family home ownership projects.

Logan County will utilize their local system for single family individual recovery application/case management.

## Part 4: Prioritizing Needs

### Allocation and Award Caps

#### General Exception Criteria

Development reserves the right to adjust grant award amounts dependent on subgrantee performance, community needs, or for other reasons to be documented.

### Administration

**Table X: Grantee Administration Activity(ies) Overview**

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
<b>Administration Total:</b>	\$705,800	5%
<b>Total</b>	\$705,800	5%

### Planning

**Table X: Grantee Planning Activity(ies) Overview**

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
<b>Planning Total:</b>	\$0	0%
<b>Total</b>	\$0	0%

Grantee Housing Program Number One

**Program Title:** Logan County Demolition Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$300,000

**Eligible Activity(ies):** Eligible activities will include demolition of blighted, destroyed, or damaged properties identified by Logan County’s Long-Term Recovery Planning Committee.

**National Objective:** Elimination of Slums and Blight

**Lead Agency and Distribution Model:** The Logan County Land Bank will receive a subgrant agreement from Development.

**Program Description:** Logan County has identified 37 properties that are considered standing debris and dangerous. The Logan County Landbank is able to demolish these structures at an average cost of \$8,100 per unit. Therefore, Development proposes providing \$300,000 to the Logan County Land Bank to complete demolition of these structures to allow for new development of replacement housing to occur, either as part of the following programs or at the owner’s discretion. This model allows property owners to maintain ownership rights to the land without having to absorb the costs of demolition as a part of their recovery process.

**Eligible Geographic Areas:** Logan County

#### Grantee Housing Program Number Two

**Program Title:** Single Family Homeowner Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$3,500,000

**Eligible Activity(ies):** Eligible activities include the development of single family homes utilizing Habitat for Humanity’s sweat equity model, homeownership counseling, and planning costs.

**National Objective:** Low-Moderate Income Recipients – all individuals that qualify for assistance with Habitat for Humanity are LMI populations.

**Lead Agency and Distribution Model:** Habitat for Humanity of Logan County will receive a subgrant agreement from Development.

**Program Description:** Habitat for Humanity – Logan County will provide 3-bedroom, 2-bathroom homes for the average price of \$130,000 in materials per home. Habitat’s model is for labor costs to be provided through volunteer labor and sweat equity of the homeowner, reducing costs. Habitat estimates the ability to produce 8-10 units of single-family housing per year. Therefore, Development proposes providing \$3.5 million to Habitat for Humanity Logan County to construct approximately 22-26 homes, or until funds are completely expended in compliance with Development’s grant agreement.

**Eligible Geographic Areas:** Logan County

**Mitigation Measures:** Houses will be built to current floodplain maps and regulations, with appropriate elevation requirements met.

#### Grantee Housing Program Number Three

**Program Title:** Multifamily Rental Housing Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$3,500,000

**Eligible Activity(ies):** Eligible activities include the development of multifamily rental units and planning costs.

**National Objective:** Low-Moderate Income Recipients – 70% of units in projects are reserved for LMI populations.

**Lead Agency and Distribution Model:** Logan County Metropolitan Housing Authority will receive a subgrant agreement from Development.

**Program Description:** Two multifamily housing projects will be available under this program. The primary initial project is to subgrant to the Metropolitan Housing Authority (MHA). With a 10-acre plot identified as a potential purchase. The primary portion of multifamily housing funds will be sub granted to the Logan County Commissioners to be used in accordance with procurement requirements. Development proposes providing \$4 million for the purchase of the 10-acre plot for use by the MHA to build a multifamily housing complex and to procure housing developers for further multifamily development in Logan County. **Program Description:** Habitat for Humanity – Logan County will provide 3-bedroom, 2-bathroom homes for the average price of \$130,000 in materials per home. Habitat’s model is for labor costs to be provided through volunteer labor and sweat equity of the homeowner, reducing costs. Habitat estimates the ability to produce 8-10 units of single-family housing per year. Therefore, Development proposes providing \$3.5 million to Habitat for Humanity Logan County to construct approximately 22-26 homes, or until funds are completely expended in compliance with Development’s grant agreement.

**Eligible Geographic Areas:** Logan County

**Mitigation Measures:** Units will be built to current floodplain maps and regulations, with appropriate elevation requirements met.

## Infrastructure

### Infrastructure Programs Overview

**Table X: Grantee Infrastructure Programs Overview**

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure Program Number One	\$2,000,000	14.2%
Infrastructure Program Number Two	\$1,997,120	14.1%
<b>Infrastructure Program Total:</b>	\$3,997,120	28.3%
<b>Total</b>	\$3,997,120	28.3%

### Grantee Infrastructure Program Number One Template

**Program Title:** Logan County Water/Wastewater Improvements

**Amount of CDBG-DR Funds Allocated to this Program:** \$2,000,000

**Eligible Activity(ies):** Eligible activities include planning costs; repair, expansion and replacement of both water and wastewater systems; repair, expansion, and replacement of electric and gas utility services.

**National Objective:** LMI Populations – over 70% of individuals served by these projects will be LMI.

**Lead Agency and Distribution Model:** The Logan County Commissioners will receive a subgrant agreement from Development and will follow their local and state procurement processes to subaward funds to the entities completing the various projects to be undertaken.

**Program Description:** Logan County Commissioners have identified several potential projects to improve infrastructure needs that relate to the tornado disaster and recovery efforts. Several water/wastewater systems within Logan County are extremely outdated and overburdened, requiring repairs and expansions in several areas. During the immediate aftermath of the tornadoes several communities were without proper water resources so these projects seek to address that shortage for future events. Additionally, several plots of land for sale in the region that may serve as plots for housing development are in need of utility access to the plots and parcels for proper development of the housing that will be possible with these funds.

**Eligible Geographic Areas:** Logan County

**Mitigation Measures:** Any work being conducted under this program will be done to current planning, zoning, and design standards, including updated materials and service thresholds. Work will also take into account the floodplain maps of the region.

## Part 5: Method of Distribution

The Method of Distribution is tasked with allocating resources based upon multiple layers of needs and prioritization. As mentioned in Part 4, Development will expend all CDBG-DR funds in the MID county, as the conversations with other impacted counties indicated no further unmet need. Due to the extent of the damage, Development prioritized housing and infrastructure programs over economic and public services programs. Development allocated the funds to the following programs: Single-Family Homeowner Program (21.25%), Demolition Program (2.1%), Multifamily Rental Program (21.25%), Infrastructure Improvements Program (28.3%), planning (7.1%), and administration (5%).

### Program Budget

Development anticipates Logan County's unmet 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 the majority of program dollars for housing recovery activities, followed by infrastructure and administrative activities. The program budget is outlined in the table below. Updated expenditures per budget line item can be found within Development's Quarterly Performance Reports (QPR) which will be posted to Development's website.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
<b>Administration</b>	\$705,800	5%			
<b>Planning</b>	\$1,000,000	7.1%	0		
<b>Housing</b>	\$6,295,680	44.6%	60%	100%	70%
<b>Infrastructure</b>	\$3,997,120	28.3%	40%	100%	70%
<b>Mitigation Set-Aside</b>	\$2,117,400	15% <sup>7</sup>	100%	100%	70%
<b>Total</b>	\$14,116,000	100%	100%	95%	70%
<b>% of Total</b>	100	100	15	95 <sup>8</sup>	70 <sup>9</sup>

#### Rationale for Distribution of Finding

Multi- and single-family housing supply seem to have been closely impacted by the number of affected properties identified in the Logan County’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. Adding a mix of single-family and 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.

Based on this information and the remaining unmet needs identified in the plan, specifically around infrastructure and utility access, the state prioritized constructing both new single-family owner-occupied housing units as well as multi-family rental housing units and infrastructure projects such as water/wastewater and other utility hookups 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 LMI persons. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI) in

<sup>7</sup> At a minimum, grantees are required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that grantees will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee does not have the ability to demonstrate a tieback to the disaster.

<sup>8</sup> Grantees are required to spend a minimum of 80% of their funds in the HUD identified MID areas.

<sup>9</sup> Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries.

the county where the applicant lives. Development will use the urgent need national objective to assist low to moderate income (LMI) households with incomes up to 100% AMI in the single-family homeowner programs. Additionally, the state will utilize the slum and blight clearance eligible activity under CDBG-DR, as the state identified this as a remaining unmet need for Logan County.

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 and LMI households.

#### *Multi-family Rental 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 Logan County, Ohio.

#### *Single Family Homeowner Program:*

Households receiving assistance in the single-family homeowners' assistance program must meet a National Objective. The National Objective met for this program was Low- and Moderate-Income Benefit. Benefit awards will meet low- and moderate-income national objective when serving households with income at or below 100% of AMI National Objective.

Applicants declare their income on the intake application and case managers verified the income to determine that the National Objective was achieved. Subrecipients adhered to the most current HUD Income Limits Logan County, Ohio at the time of each household's application for assistance.

Funding assistance and economic and workforce development support remain available from existing state, regional and local programs.

#### *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 benefits for the same purpose and/or effect to recover from 2024 Presidentially Declared Disasters. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss which the person has received financial assistance under any other program, from private insurance, charitable assistance or any other source.

A duplication of benefits occurs when:

- A beneficiary receives assistance; and
- The assistance is from multiple sources; and
- The assistance amounts exceed the need for a particular recovery purpose.

To prevent duplication of benefits, Development requires 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 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 and infrastructure needs, Development will implement programs to serve those needs. Logan County will utilize the Long-Term Recovery Planning Committee to connect 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.

### 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 (2024) State of Ohio Hazard Mitigation Plan is available at: <https://ema.ohio.gov/mitigation-recovery/mitigation/mitigation-planning/state-of-ohio-hazard-mitigation-plan/01-state-of-ohio-hazard-mitigation-plan>.

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 Logan County does not have coastal boundaries, the state does not have to plan for storm surges. Furthermore, one of the state plan's objectives was to promote wind mitigation techniques and programs such as the Ohio Safe Room Rebate Program, which was funded through 2023.

The MID area is covered by the Logan County Natural Hazard Mitigation Plan that was revised in 2017 and is available at

<https://services.dps.ohio.gov/MIP/PublicSite/LocalPlan/GetDocument?fileUploadID=1089&filename=00%20Logan%20Cover-TOC-Executive%20Summary.pdf> The premitigation 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 by subgrantees for the CDBG-DR necessary planning, including the 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.

The State of Ohio did not use CDBG-DR funds to develop the statewide or MID area Hazard Mitigation Plans. Both plans were completed before HUD allocated the state its CDBG-DR funding.

## Part 6: Program Administration

### Citizen Participation – Outreach Efforts

#### Consultation of Developing the Action Plan

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	FEMA and SBA were in Logan County immediately after the emergency declaration to provide assistance and Development requested damage summary assessment data and assistance data from FEMA as part of the plan writing process.
Local/State Government	As part of the consultation process, Development staff attended a meeting of the Logan County Long Term Recovery Planning Committee which consisted of several municipal representatives, commissioners, elected officials, and others who were able to share data on the damage from the event, as well as the outline of their long term recovery plan and its priorities which greatly informed the writing of this action plan.
Nongovernmental organizations	Several local nonprofit agencies were a part of the discussion at the Logan County Long Term Recovery Planning Committee meeting that Development attended. Organizations such as Habitat for Humanity of Logan County, the Logan County Land Bank, and others like United Way are all actively participating in planning efforts and willing to supply resources, staffing, and expertise to several of the efforts laid out in this plan.
Private sector	Private sector partners, particularly from the real estate community and some developers have participated in conversations with Development and Logan County about the needs from the region and potential projects and solutions with these CDBG-DR dollars.
State and local emergency management agencies that have primary responsibility for the	State EMA was the first call Development made when the funds were cleared to continue from the new administration. State EMA teams connected Development to the local EMA partners who met several times to review the CDBG-DR program and its specific guidelines, as well as discuss the damage across the multi-county declaration area. Those

administration of FEMA funds	conversations informed the final decision by Development to leave all CDBG-DR project dollars with Logan County, as they had the largest identifiable unmet need.
Agencies that manage local Continuum of Care	In the immediate aftermath of the disaster, Development staff reached out to the local CoC, which is Ohio’s Balance of State Homeless Planning Region 13, to see if there were any immediate needs or any support that could be offered. There are no shelters directly in Logan County and no structures serving as shelters were damaged in any of the other counties, so no needs were accounted for. Family Abuse Shelter of Miami County, the Region Lead Agency, has indicated no additional needs or increases in service requests since then in conversations with Development.
Public Housing Agencies	Logan County’s local PHA has been an active participant in the Long Term Recovery Planning Committee in Logan County and indicated in speaking with Development that they would be able to own and operate potential housing units that may come online as a result of these funds.
State Housing Finance Agencies	The Ohio Housing Finance Agency (OHFA) was contacted through the planning process to determine if the LIHTC resources they utilize may be a promising option, particularly for the multifamily housing goals of the Logan County Long Term Recovery Planning Committee. It was determined that, given the timeframe of both programs, LIHTC deals would likely not be feasible in the region. Additionally, cost considerations with a smaller multifamily housing budget indicated that having the DR funds be the sole funding source on a project would yield units quicker and with less constraints. Therefore, for this round of funds, OHFA will not receive any money but will be available as a resource for grantees.

**Public Comments**

Development encourages involvement from citizens in all aspects of the CDBG-DR Program. To this end, Development ensured that citizens and interested members of the public had an opportunity to review and comment on the draft Action Plan. The draft Action Plan was posted on Development’s website for a 30-day public review period beginning on May 20, 2025. A summary of all comments and responses were included in the final Action Plan submitted to HUD for approval. The HUD-approved Action Plan was posted on Development’s website at <https://development.ohio.gov/community/economic-development/disaster-recovery-grant>.

**Public Hearings**

Development’s Community Services Division held the 30-day public comment period beginning May 20, 2025, along with a hybrid virtual/in person Public Hearing that will be held on June 3, 2025. 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/community/economic-development/disaster-recoverygrant>.

### *Accessibility of Public Hearings and Meaningful Access*

Development 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). Development 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.

### Consideration of Public Comments

No official public comments were received at this time concerning the Draft PY 2025 CDBG-DR Action Plan.

Comment Received	Grantee's Response

### Citizen Complaints

Citizens may file a written complaint or appeals through the Disaster Recovery email at [OHS@development.ohio.gov](mailto:OHS@development.ohio.gov) or submit by mail to the following address:

Ohio Department of Development  
Community Services Division  
Attention: CDBG-DR  
Floor 26  
77 South High Street  
Columbus, OH 43215

Development will make every effort to provide a timely response within 15 working days of the receipt of complaint, where practicable.

## General Information

### 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.

### 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.my.site.com/OCDTA/s/article/15-04-Program-Income-Policy>

The state will permit local governments and subrecipients, as it will not be directly implementing any part of the CDBG-DR 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) permit 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 grantee 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. Development 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.

Development is requesting a waiver to 24 CFR 570.200(h) to allow pre-award costs of up to \$500,000 for each subrecipient grant agreement.. All Subrecipients are limited to pre-award costs permitted by the applicable Federal Register notices governing the CDBG-DR award. These costs also are limited to those authorized under 24 CFR 570.200(h). This will allow the program to launch quickly.

### 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.

## Modifications 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 webpage and will afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plans 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 Reports

In accordance with HUD requirements, Development 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.

## Appendices

## References