

**JEFFERSON COUNTY, ALABAMA
PROPOSED
CDBG-DISASTER RECOVERY ACTION PLAN
DRAFT FOR PUBLIC REVIEW**



JEFFERSON COUNTY COMMISSION

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**JEFFERSON COUNTY OFFICE OF COMMUNITY & ECONOMIC
DEVELOPMENT**

Frederick L. Hamilton, Director

Community Development Block Grant (CDBG) Disaster Recovery Action Plan

Checklist

SF-424/CFDA #14:218;14.228

I. Impact and Unmet Needs Assessment

II. Recovery Planning

- (a) Sound, sustainable, long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood-plain management
- (b) Coordination with other local and regional planning efforts

III. CDBG-DR Leverage

IV. Construction Methods

V. Housing Initiatives

- (a) Transitional housing needs of homeless individuals and families
- (b) Prevention of low-income individuals and families with children (especially those with incomes below 30 percent of the area median) from becoming homeless
- (c) The special needs of persons who are not homeless but require supportive housing (e.g., 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) or 91.215(e) as applicable)

VI. Displacement

VII. Program Income

VIII. Monitoring

IX. Fraud Prevention

X. Grant Capacity

XI. Unmet Needs/CDBG-DR Grant Allocation

XII. Performance Schedule

Housing

Infrastructure

Economic Development

Planning and Administration

Other (if applicable)

XIII. Citizens' Participation

IX. Certifications

INTRODUCTION

The United States Department of Housing and Urban Development requires that in order to receive funding under the Community Development Block Grant Program (CDBG), the Home Investment Partnerships Program (HOME), the Emergency Shelter Grant Program (ESG), The Emergency Solutions Grant Program (ESG), and the Housing Opportunities for Persons with AIDS Program (HOPWA). Each entitlement city or urban county must prepare a Consolidated Plan. This Plan was prepared in the year 2010. The Plan identifies housing and non-housing needs over a five year period, assigns priorities to each of the needs and a strategy for meeting those needs, and sets out a one year Action Plan establishing funding. The overall goal of the community development programs is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for low- and moderate-income persons. This Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan following approval by HUD will become a part of that plan.

The Jefferson County Consortium is made up of the unincorporated areas of Jefferson County, Alabama and 30 municipalities within the County. The Cities of Birmingham, Bessemer, County Line, West Jefferson, Argo, Sumiton, Helena and Hoover are the only cities in the County not participating in the Consortium. Birmingham, Bessemer and Hoover are entitlement cities themselves. However, due to the nature of the CDBG-DR program, assistance will only be made available to designated areas within the Jefferson County Consortium as described in Section I. Impact and Unmet Needs Assessment. The Final Amended Statement for the CDBG-DR Grant will be developed after receiving citizen comments and views during the 7-day comment period and also at a public hearing to be held on July 2, 2012 at 2:00 p.m. at the Jefferson County Office of Community & Economic Development 716 Richard Arrington Jr. Blvd. North, Suite A-420, Birmingham, Alabama, 35203. Written comments regarding the proposed plan must be received prior to 5:00 PM on July 5, 2012. Written comments should be submitted to the following:

Proposed CDBG-Disaster Recovery
Jefferson County Office of Community & Economic Development
716 Richard Arrington Jr Blvd N, Ste. A-430
Birmingham, AL 35203
Attn: Yolanda Caver

Or

Written comments can also be submitted prior to 5:00 PM on July 5, 2012 by electronic submission to the following:

To: burrellsy@jccal.org
Subject: CDBG-DR Comments

Special accommodations can be made available, upon request, for those with disabilities. Those needing special accommodations should contact the office at 205-325-5761 in advance.

AVAILABILITY OF THE PROPOSED CDBG-DR ACTION PLAN

Copies of this plan are available for review at the Jefferson County Office of Community & Economic Development, 716 Richard Arrington Jr. Blvd. North – Suite A430, Birmingham, AL 35203, by calling 325-5761, and online at <http://jeffconline.jccal.org/comdev/home/Home.html> in

English and in Spanish. Arrangements can also be made available upon request to meet the Special Needs Requirements of those with disabilities and those who would like to request the proposed plan in other languages.

I. IMPACT AND UNMET NEEDS ASSESSMENT

Introduction

On April 27, 2011, Jefferson County experienced its fourth major tornado since 1956. The major storm producing tornados, which came out of the west, devastated Tuscaloosa, Alabama and continued east towards Jefferson County. By the time the major storm event reached Jefferson County, six (6) tornados had been reported. This major storm event swept through Jefferson County leaving a wake of destruction in its path with a reported EF-4 to EF-5 tornado killing six (6) people. The municipalities of Pleasant Grove, Fultondale, Warrior, and Vestavia Hills as well as the unincorporated areas of Concord, McDonald Chapel, and North Smithfield were the areas of the Jefferson County Consortium impacted by the storm.

The community assessment presented below will include a historical perspective of tornados in Jefferson County; contributing factors of frequent tornado activity in Jefferson County; an overview of communities impacted by the April 27, 2011 tornado; an overview of unmet needs in the impacted areas; and overview of specific unmet needs identified during public meeting held between May 10, 2012 through June 5, 2012.

Historical Perspective of Tornados in Jefferson County

Since the 1950's, Jefferson County has experienced five (5) major tornados. The capacity of these tornados has ranged from EF-4 to EF-5. The county was struck by major tornados in 1956, 1977, 1998 and 2011. Below is an overview of the major storm events that have severely impacted Jefferson County.

The first Jefferson County tornado, which occurred on April 15, 1956, originated near Pleasant Grove, Alabama with an approximate 21 mile path that also struck two unincorporated areas known as Edgewater and McDonald Chapel. This tornado also struck the municipal areas of Tarrant and Birmingham. In the city of Birmingham, the Pratt City neighborhood was struck.

The second major tornado event occurred on April 4, 1977. This F-5 tornado also struck the Pratt City area and another community in unincorporated Jefferson County known as North Smithfield. This devastating tornado even resulted in major damage and the death of 22 people.

The third major tornado struck the unincorporated Oak Grove community on April 8, 1998 and killed 32 people. The storm traveled more than 30 miles and also impacted the unincorporated communities of Concord, Edgewater and McDonald Chapel. Once again the city of Pleasant Grove was in the path of a tornado. By the time this storm event had swept through Jefferson County, more than 1,000 homes were destroyed with an additional 900 homes sustaining major damage.

On April 27, 2011, six (6) tornados touched down in Jefferson County. Seven (7) people in the unincorporated communities of Concord, McDonald Chapel, and North Smithfield died during these tornados that ranged in severity from EF-4 to EF-5.

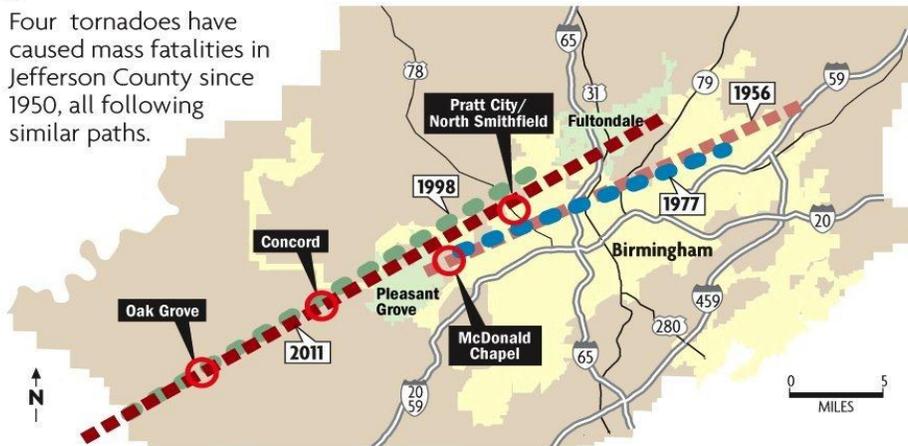
On January 23, 2012 again a major tornado struck the eastern section of Jefferson County as a category EF-3 tornado with winds peaked at 140 mile per hour. This tornado caused significant damage in the unincorporated Oak Grove community and municipalities of Pinson, Center Point, and Clay. The storm killed two (2) people, a 16 year old girl who resided in Clay, Alabama and an 81 year man who lived in the Oak Grove community.

Contributing Factors

Researchers are describing the northern two (2) thirds of Alabama as a battleground for severe weather where contrasting air masses battle along a front that usually runs southwest and northeast. Cold fronts have come from the northeast and met with warm unstable air from the Gulf of Mexico. The frequent locals where these two fronts have met have become known as Dixie Alley. Historically, these storm tracks have moved through Jefferson County where they typically run north of Interstate 59 with a corridor that includes western Jefferson County.

JEFFERSON COUNTY'S DEADLY TORNADOES

Four tornadoes have caused mass fatalities in Jefferson County since 1950, all following similar paths.



	1956 F4 ■■	1977 F5 ●●	1998 F5 ●●	2011 EF4 ■■
Date	April 15, 1956	April 4, 1977	April 8, 1998	April 27, 2011
Injuries	200	130	258	Over 1,000
Fatalities	25	22	32	19 *
Length	21.3 miles	14.7 miles	24.3 miles	80.3 miles
Width	200 yds.	550 yards	1,320 yards	1.5 miles
Property damage	\$2.5 million	\$25 million	\$200 million	TBD

* 19 deaths in Jefferson County. Total death toll 65 along the tornado's track.
Sources: National Weather Service, National Climatic Data Center

NEWS STAFF

Source: The Birmingham News, May 22, 2011

*Overview of Communities in the Jefferson County Consortium Impacted
by the
April 27, 2011 Tornado*

Concord

The Concord community, which is located southwest of Birmingham, Alabama, suffered major damage from the tornado mentioned above. Concord is an old mining community which according to the 2010 Census has a population of 1,847. The storm did major damage to the Concord Highlands neighborhood and killed six (6) people.

According to the 2010 Census there are 817 households in the Concord community. One hundred percent of these homes are single family, detached and approximately 875 of the homes are owner occupied. Approximately, 100 homes, which represents 13% of the housing stock in Concord were totally destroyed or rendered inhabitable. A majority of the homes were at least 20 to 50 years old. There were approximately 50 homes in Concord that received major damage and approximately 100 homes that had minor damage from straight line winds.

The impact of the April 2011 tornado also severely damaged the storm drainage facilities in the Concord Highlands neighborhood.

Debris removal and demolition also remains a critical issue throughout the community.

The storm also totally destroyed four (4) businesses and damaged eight (8) additional businesses, which included the main store, the community gas station, and Cliffs Natural Resources' processing plant.

McDonald Chapel

The McDonald Chapel Community is located 10 miles west of Birmingham, Alabama and is traditionally an agricultural community. The community was established in 1866 and named after William McDonald who donated one and a half acres of land to a small congregation and helped to erect a church building of hewn logs.

The April 2011 tornado ripped across the southern section of McDonald Chapel. The storm totally destroyed 20 homes and rendered another 11 inhabitable.

According to the 2010 Census, McDonald Chapel's population is 717.

Prior to the storm, the Census states there were 371 housing units. There were 268 or 77% occupied homes. Sixty-five or 17.5% of the homes in the community are vacant.

According to the Jefferson County EMA office, the April 2011 tornado caused major damage to 22 homes and minor damage to 20.

Housing rehabilitation and rebuilding is an unmet need in the community that still exists.

Street lights are also an unmet need of the community.

The storm also impacted a building used by a non-profit organization. This facility still has unmet needs.

Debris removal and demolition is also an unmet need of the community.

North Smithfield

The North Smithfield community is located less than six (6) miles northwest of Birmingham, Alabama and was formed during the century's postwar boom.

According to the 2010 Census, there are 1,100 citizens in the North Smithfield community.

The Census states there are 381 households in the community.

Approximately 85% of the citizens in the community sustained damage to their homes during the storm event. The April 2011 tornado led to 147 homes in North Smithfield receiving major damage and 182 homes receiving minor damage.

Community leaders also state there is an unmet need for the local volunteer fire station.

There still exist an unmet need for debris removal and demolition in North Smithfield.

Pleasant Grove, Alabama



Source: cityofpg.com

Pleasant Grove, Alabama is a suburb of Birmingham and located approximately 12 miles west of Birmingham, Alabama. Pleasant Grove was established in 1889, but was not incorporated until January 1937.

According to the 2010 Census, Pleasant Grove has a total of 10,110 citizens. The Census also states there are 3,597 housing units within the corporate limits. Of the 3,597 occupied housing units in Pleasant Grove, 3,260 or 90.6% are owner occupied and 337 or 9.4% are renter occupied.

Pleasant Grove received major damage from the April 2011 tornado. According to the Jefferson County EMA office, 230 households in Pleasant Grove received major damage and 364 home received minor damage.

Housing rehabilitation and rebuilding is an unmet need of the community.

The storm also caused major damage to the storm drainage facilities in Pleasant Grove and local official state there still exist an unmet need.

In addition, there is a significant amount of debris removal and demolition needed the Pleasant Grove.

Vestavia Hills, Alabama



Vestavia Hills, Alabama is located south of Birmingham Alabama. According to the 2010 Census, Vestavia Hill's population is 34,033. The city is named for the 20 acres

estate of former Birmingham mayor George B. Ward. Ward's mansion at the Vestavia estate became a landmark in the area as soon as it was completed in 1925.

According to the 2010 Census, Vestavia Hill has a total of 10,523 housing units. There are a total of 9,841 occupied housing units in Vestavia, Alabama. Of the 9,841 occupied housing units 7,688 or 78.12% are owner occupied and 2,153 or 21.9% are renter occupied. There 682 vacant housing units in Vestavia Hills, Alabama.

The April 27, 2011 tornado damaged two (2) fire stations, a parks complex and a sports park. Insurance payments have restored these public facilities.

Homes were damaged in the Cahaba Heights community leaving a need for housing rehabilitation and debris removal assistance.

The citizens of the Cahaba Heights community have requested a dual purpose storm shelter be built to provide a safe haven during major storm events.

Fultondale, Alabama

Fultondale, Alabama is located approximately 15 miles north of Birmingham, Alabama. According to the 2010 Census data, the population of Fultondale is 8,380 persons.

Fultondale was once known as Fulton Springs. Prior to the building of Interstate 65, US 31 were the main route for travelers northbound from Birmingham towards Nashville, Tennessee.

The 2010 Census states Fultondale, Alabama has a total of 3,564 housing units. The Census states 2,579 or 72.4% are owner occupied and 984 or 27.6% of the housing units are renter occupied. There are 276 vacant housing units in Fultondale, Alabama.

Many homes were damaged by the storm, thus leaving a need for debris removal and demolition.

Furthermore, the 2011 tornado destroyed a fire station and damaged the city's library.

There were also several businesses that were damaged by the storm.

According to city officials, a majority of the damaged caused by the April 2011 storm has been repaired.

However, Fultondale, Alabama will be considered for any funding available under the county's CDBG-DR- program based on the availability of funds.

Warrior, Alabama

Warrior, Alabama is located in north Jefferson County. The 2010 Census states Warrior has a population of 3,176 persons.

The City of Warrior is named after the warrior coal fields, which J. T. Pierce opened in 1872. The coal fields were named after the Black Warrior River.

The 2010 Census states there are 1,302 housing unit within the city limits of Warrior, Alabama.

The City of Warrior does not report in major damage other than the damage received to public facilities, mainly a city park that stills has unmet needs.

Overview of Unmet Needs From the April 27, 2011 Tornado in the Jefferson County Consortium

The Jefferson County EMA office identified seven (7) areas in the Jefferson County Consortium that was impacted by the April 2011 tornado. These areas include Concord, McDonald Chapel, Pleasant Grove, North Smithfield, Vestavia Hills, Alabama Fultondale, Alabama, and Warrior, Alabama.

Staff from the Community and Economic Development office conducted a series of meetings in the areas mentioned above in order to explain to the citizens of the areas eligible activities that could receive assistance from the HUD Disaster Funds. These meetings occurred from May 10, 2012 until June 5, 2012.

In each of the public meetings, local officials and the public was informed of the meaning of unmet need, as well as given an overview of eligibility activities to include the following:

1. Housing Rehabilitation
2. Rebuilding Homes
3. Down Payment Assistance and /or Closing Cost
4. Public Facilities
5. Demolition
6. Debris Removal
7. Infrastructure
8. Economic Development
9. Planning.

At the end of each meeting, the citizens as well as public officials were asked to provide a list of unmet needs to the Community and Economic Development office. In most cases, the Office of Community and Economic Development received the names of persons

needing assistance with housing, whether it was housing rehabilitation or assistance with rebuilding. The same information was received from those who anticipated needing down payment assistance or assistance with closing cost.

Citizens and local officials also provided documentation on the need for debris removal and demolition.

Information from the meetings, as well as documentation received from citizens and public officials also revealed a need for infrastructure and public facilities.

In addition, Community and Economic Development did speak to several businesses in the tornado impacted areas needing assistance.

There was no request for planning, although this is an eligible activity under the CDBG-DR program.

Below is a breakdown of unmet needs in the impacted storm areas mentioned above:

McDonald Chapel		
	Project Type	Number
1.	Housing Rehabilitation	13
2.	Home Rebuilding	3
3.	Home Relocation	1
4.	Non-Housing Rehabilitation	1
5.	Infrastructure (Light Replacement)	1
6.	Dual Purpose Storm Shelter	1

North Smithfield		
	Project Type	Number
1.	Housing Rehabilitation	40
2.	Public Facility (Damaged Fire Station/Dual Purpose Storm Shelter)	2
3	Safe Room	7
4	Debris Removal	15 lots
5.	Demolition	15 homes

Warrior, Alabama		
	Project Type	Number
1.	Public Facilities (City Parks)	

Concord		
	Project Type	Number
1.	Housing Rehabilitation	13
2.	Safe Room	7
3.	Home Rebuilding	3
4.	Down Payment/Closing Cost Assistance	1
5.	Debris Removal	8 lots
6.	Demolition	5 homes
7.	Infrastructure Storm Damage	1
8.	Dual Purpose Storm Shelter	1

Pleasant Grove, Alabama		
	Project Type	Number
1.	Housing Rehabilitation	10
2.	Safe Rooms	5
3.	Home Rebuilding	3
4.	Down Payment/Closing Cost Assistance	1
5.	Debris Removal	33 lots
6.	Demolition	15 homes
7.	Infrastructure Storm Drainage	1

Vestavia Hills, Alabama		
	Project Type	Number
1.	Housing Rehabilitation	10
2.	Safe Rooms	6
3.	Debris Removal	1 lot
4.	Public Facilities	1

II. RECOVERY PLANNING

HUD Disaster Fund Guidelines for Assistance

Application for Assistance

Persons seeking assistance for unmet needs due to the April 27, 2011 tornado can apply to Jefferson County's Community and Economic Development Department by completing an application for assistance. Applications will be developed by the Community and Economic Development staff for the various eligible activities under Jefferson County's Community Development Block Grant Disaster Recovery (CDBG-DR) funds.

The eligible activities under Jefferson County's CDBG-DR program are presented below:

1. Housing Rehabilitation
2. Safe rooms for homes receiving housing rehabilitation
3. Rebuilding
4. Debris Removal
5. Demolition
6. Public Facilities
7. Non-Housing Rehabilitation
8. Infrastructure
9. Economic Development
10. Planning

Documentation of Resources Received by Applicant

Applicants applying for assistance will complete a legally binding document disclosing all assistance received from insurance payments, FEMA assistance, SBA assistance and any other resource. The assistance identified will be verified and deducted, thus leaving an unmet needs balance.

Guidelines for Receiving Eligible Assistance

Owner Occupied Housing Rehabilitation

Applicants requesting assistance under the owner occupied housing rehabilitation program will be required to complete an application. The applicant will also be required to document ownership of the home.

The first priority for housing rehabilitation assistance will be homes impacted by the April 27, 2011 tornado. The homeowner will document the home was impacted by the previously mentioned storm.

Of this pool of applications, priority will be given to persons based on need and their Median Household Income.

After homes impacted by the storm have been identified and prioritized, the Community and Economic Development Department will consider homes in the storm impacted area that were not impacted by the storm.

Priority will directly be based on need and Median Household Income.

Homeowners requesting a safe room will also be considered.

Home Rebuilding

Homeowners needing assistance with unmet needs to rebuild their homes will be eligible to apply for assistance. The homeowner will complete an application documenting the loss of the home during the April 2011 storm as well as proof the home was insured.

The homeowner will also complete a legally binding form disclosing assistance received from other resources.

Homeowners will be eligible for a loan with an interest rate ranging from 3.68% fixed rate (30 years) to 3.09% fixed rate (15 years) based on the terms of the loan.

The home will serve as collateral.

The homeowner will be required to maintain insurance on the home during the life of the loan.

The homeowner will produce documentation of the ability to repay the loan, as well as provide the Community and Economic Development staff with permission to run a credit check.

Persons who have been impacted by multiple tornados in the past who desire to move out of the tornado impacted areas will also be eligible for rebuilding assistance to cover unmet needs. The homeowner will have to document they have experienced at least two (2) tornado events to be eligible for assistance and follow the guidelines presented above.

Debris Removal

Homeowners who have debris on property left from the storm will be eligible for assistance after the unmet needs have been documented. No assistance will be provided for debris on open land such as pastures, etc. The Jefferson County Department of

Inspection Services or the Jefferson County Health Department will have to declare the debris a nuisance in the unincorporated areas of the county in order for assistance to be considered.

For municipalities in Jefferson County impacted by the storm, the Community and Economic Development Department will make the city the sub-grantee and the local laws governing debris removal will be followed.

Demolition

Demolition assistance will be provided for homes destroyed by the storm and left by the property owner upon receipt of an application. Properties in the unincorporated areas of the county impacted by the April 2011 tornado will be inspected by the Jefferson County Land Development Department and deemed a nuisance in order for assistance to be considered.

A lien will be placed on the property on an amount equal to the cost of the demolition activity.

The Jefferson County Inspection Services Department will follow its standard procedures in determining properties that meet demolition eligibility and abide with all state and county regulations and guidelines for carrying out the demolition process.

In some cases, the Community and Economic Development Department may work with the Jefferson County Health Department to determine if the home is a nuisance. In these cases, Community and Economic Development will make the Jefferson County Health Department the sub-grantee and follow the Health Department's guidelines for demolition.

For municipalities in Jefferson County impacted by the storm, the Community and Economic Development Department will make the city the sub-grantee and the local laws governing debris removal will be followed.

Public Facilities

Construction of public facilities will consist of building dual purpose community storm shelters in the areas impacted by the April 2011 tornado. As mentioned previously, Jefferson County is located in "tornado alley" and has experienced five (5) tornados since 1956. These tornados have ranged from EF-3 to EF-5.

Applications will be received from communities requesting this form of assistance documenting the need for the facility.

The April 27, 2011 tornado caused billions of dollars of damage in Jefferson County and killed six (6) people. On January 23, 2012, another major tornado struck Jefferson County and killed two (2) persons.

The dual purpose community storm shelters will be built to FEMA standards in order to withstand high winds and provide a safe haven for the citizens in the impacted areas.

Public facilities will require a licensed architect, which will be procured by Request for Proposals (RFP) to design the facilities in accordance with FEMA standards, as well as bidding the project to state licensed contractors.

Infrastructure

Infrastructure under the CDBG-DR program is defined as storm drainage improvements. The April 2011 tornado damaged storm drainage facilities and ditches, which is negatively impacting the flow of storm water.

Impacted communities will complete an application for assistance.

Storm drainage projects will consist of a professional engineering firm being procured by RFP process for design and working with Community and Economic Development to competitively bid the projects for construction.

Non-Housing Rehabilitation

Non-Housing Rehabilitation is defined as a non housing facility that was damaged by the April 2011 tornado needing rehabilitating.

The applicant applying for this assistance will have to document it has a 501 (c) (3) status from the IRS, as well as document an unmet need as it relates to the April 2011 storm impacting the facility.

The facility will be inspected by Community and Economic Development's Housing Rehabilitation Specialist. The inspection will lead to a work write-up of rehabilitation work, which will be bid to licensed building contractors.

Economic Development Microloan

The Community and Economic Development Department will make microloans not to exceed \$10,000.00. The loan funds will be used for the stabilization of the business. The applicant will have to document the business was impacted by the storm and there exists an unmet need.

The micro-loan program will provide assistance to persons owning a business with five (5) or fewer employees.

The applicant will complete an application requesting microloan assistance and document sufficient funds to service the debt.

The applicant will be required to provide insurance on all equipment during the life of the loan.

Collateral will be required.

The interest rate will be a maximum 75% of the bank rate and a minimum of 50% of the bank rate.

The term of the loan will be negotiated up to five (5) years.

Eligible Activities include working capital and equipment.

Planning

Although there were no requests for planning assistance, planning is an eligible activity under the HUD CDBG-DR program.

Mitigation plans, strategic plans and other planning documents will be considered upon receipt of an application.

III. CDBG-DR LEVERAGE

IV. CONSTRUCTION METHODS

Owner Occupied Housing Rehabilitation

Each site will be inspected by a Senior Housing Rehabilitation Specialist to determine the scope of work needed to make the home comply with current International Code Council (ICC) codes, along with all governing Federal and State standards and guidelines. The inspection will cover areas of structural strength, means of egress, sanitation, adequate lighting and ventilation, accessibility, energy conservation, and life safety. In the event of conflict between agency or organization standards, the most stringent will be applied.

Homes that were built before 1978 will receive lead based paint (LBP) testing using a Niton XRF analyzer, Model XLP303A on surfaces that will be disturbed. If test results are positive a thorough risk hazard assessment will be performed. The senior housing rehabilitation staff at Jefferson County's Office of Community and Economic Development are certified and accredited by the Alabama Department of Public Health as Designers, Risk Assessors, and Inspectors. Contractors that perform lead abatement through this office are required to be on the State's list of "Certified Firms". All contractors not performing abatement activities but working on pre 1978 homes are required to have training and certification in the EPA's [Renovation, Repair and Painting Rule](#) (RRP).

After a thorough inspection of the property, the senior housing rehabilitation specialists will generate a work write-up incorporating the 2009 International Residential Code (IRC) to achieve the latest high quality standards for construction. Several municipalities' inspection services have not adopted the 2009 IRC but inspections by the senior housing rehabilitation specialists will enforce the specifications of the write-up as it is incorporated in the contract for repairs.

In homes that require HVAC, windows, doors, lighting, or insulation replacement and upgrades, Energy Star[®] guidelines along with the ICC's Energy Conservation Code (IECC) will be incorporated into each repair specification and write-up.

Indoor air quality is an important component of every home. Homes that are found to have mold or mildew will be addressed using repair recommendations that identify the sources of moisture, poor construction, inadequate ventilation, or other problems and correct them. The ICC's Property Maintenance Code (IPMC) along with the EPA's guidelines for Mold Remediation will be incorporated and high quality construction methods and materials such as mildew resistant drywall will be used.

Homes that require Safe Rooms will receive assistance in full compliance with ICC-500 when constructed as safe rooms within buildings or as an addition for the purpose of providing safe refuge from storms that produce high winds, such as tornados. In addition to other applicable requirements in this code, storm shelters and safe rooms shall be constructed in accordance to National Storm Shelter Association (NSSA) and FEMA

320 and FEMA 360 guidelines. These are also built in accordance with ANSI A-117-09 and the 2010 ADAG guidelines for accessibility.

New Construction Homes and Buildings

Plans, drawings, and specifications for new homes, buildings, and community storm shelters must conform to 2009 ICC Building Codes (IBC) and 2009 IRC. Codes and standards referenced in housing rehabilitation such as Energy Star[®] guidelines along with the IECC, ANSI A-117.1-09 and the 2010 ADAG guidelines for accessibility, and the FEMA 361 guidelines for Community Storm Shelters will be incorporated.

For plans, designs, and specifications to meet approval, they must incorporate sound structural design, durable building materials, high wind resistant fastener systems, fire resistance, proper safety glass and glazing techniques for high wind regions, and high wind resistant roof systems for durability.

All construction work shall be subject to inspection by the governing jurisdiction's inspection services department and Community Development's senior housing rehabilitation specialist.

In addition to applicable to the construction requirements listed above, architects, engineers, etc. for design of infrastructure, public facilities and non-housing projects must include and pay particular attention that the projects will promote sound, sustainable long-term recovery by conducting a post-disaster evaluation of hazard risk with special emphasis on land use decisions that reflect responsible flood plain management. Also to be included during design are technical specifications that encourage construction methods that emphasize high quality, durability, energy efficiency, sustainability, and mold resistance. Prior to construction, assigned project managers will ensure that all Environmental requirements have been met, fully documented and recorded.

V. HOUSING INITIATIVES

Response:

Jefferson County, Alabama was not impacted by floods or rising waters. The area was declared a disaster based upon tornados and high winds. Jefferson County through its Office of Community & Economic Development will only provide assistance to properties located outside of a flood hazard area (Flood Zone X) as verified by a flood data service.

Homeless Prevention

In order to ensure that those individuals impacted by the storm do not become homeless the County will look to its HUD approved 2010-2015 Consolidated Plan and its current Action Plan to implement transitional housing for individuals who have been displaced by the storms.

Housing and Services for Transition to Permanent Housing and Independent Living: The County anticipates that it will support applications for funding during the duration of this CDBG-Disaster Recovery Grant by other entities. The County will particularly support those applications by other entities for programs to benefit the referenced homeless sub-populations. Housing and services for transition to permanent housing and independent living will continue to be provided to homeless and homeless subpopulations. Efforts will be made to increase the time that homeless individuals remain in permanent housing and to encourage more individuals to move to from transitional to permanent housing. Many organizations that provide these services are funded by various Action Plan Programs (CDBG and ESG for example).

Assistance for Preventing Low-Income Individuals and Families with Children (especially those with incomes below 30 percent of median) from Becoming Homeless: The County plans to provide assistance to low and very low income homeowners in order to rehabilitate structures classified as substandard. The program will provide affordable housing assistance to low and very low income households who otherwise could become homeless. The County anticipates that it will also support applications for funding during the duration of this CDBG-Disaster Recovery Grant by other entities that provide services to prevent low-income households from becoming homeless. Several organizations that provide these services are funded by various Action Plan Programs (CDBG and ESG for example).

Assistance to address the special needs of persons who are not homeless identified in accordance with 24 CFR 91.215(e). The County anticipates that it will support applications for funding during the duration of this CDBG-Disaster Recovery Grant by other entities to provide assistance to the County's special needs population by increasing the availability of housing for the disabled (mental, physical, and developmental) and to increase the availability of housing for the low-income elderly and frail elderly, persons with alcohol or other drug addiction, persons with HIV/AIDS

and their families, and public housing residents. Several organizations that provide these services are funded by various Action Plan Programs (CDBG and ESG for example).

VI. DISPLACEMENT

Jefferson County will make every effort to minimize displacement of persons or entities and assist any persons or entities displaced in accordance with the Uniform Anti-Displacement and Relocation Act and local policy. Jefferson County will assist those displaced through the following activities:

(a) **Housing Rehabilitation:**

Jefferson County will offer housing rehabilitation assistance to homeowners impacted by the storm that have needs not met by hazard insurance, FEMA payments, SBA or other sources. The completion of remaining repairs will allow them to stay in their homes rather than seek alternate housing.

(b) **Home Rebuilding:**

Homeowners whose homes were completely destroyed or damaged beyond repair will be offered assistance in rebuilding their home on their lot. For example, those that were underinsured may not have the ability to replace their home with insurance proceeds, FEMA payments, SBA or other funding available. This will allow these homeowners to remain in their community rather than seek alternate housing.

(c) **Safe Rooms:**

Safe Rooms will be constructed in existing homes by reinforcing part of the structure to withstand high winds. Those homeowners that have been impacted by tornados that no longer feel safe in their homes will be offered assistance with construction of a safe room to allow them to stay in their home rather than relocate to another community.

(d) **Economic Development Micro-loan:**

The Community and Economic Development Department will make micro-loans not to exceed \$10,000.00. The loan funds will be used for the stabilization of the business. The applicant will have to document the business was impacted by the storm and there exists an unmet need.

VII. PROGRAM INCOME

Program income will be generated from loan repayments from home owners who had financing for new construction. The loans will be amortized over 30 years and the proceeds will be treated as program income. The program income will be used for eligible CDBG-DR expenditures and upon completion of the CDBG-DR grant program income will be used for eligible CDBG expenditures. Program income will be utilized before drawing grant funds.

VIII. MONITORING

All those receiving housing assistance will be required to provide proof on income eligibility and where applicable, ownership of the property. Any assistance previously provided through private hazard insurance, FEMA payments, SBA assistance or other sources must be documented. The homeowner must further document the use of such assistance by providing receipts/invoices for repairs to their home to ensure non-duplication of benefits. The homeowner will be required to sign an affidavit as to the total amount of assistance received and the use of those proceeds. A checklist will be developed to facilitate this process.

Monitoring and Duplication of Benefits

Jefferson County has an Auditor on staff that performs financial monitoring of all subrecipient contracts for financial compliance. The program staff also performs monitoring of all contracts to ensure that the program requirements are met. Should any issues arise during these monitoring, actions are taken to resolve documentation error and if the issue is not able to be resolved, funding is reduced accordingly.

Only expenditures that are eligible CDBG activities, address disaster-related needs directly related to the approved natural disaster, and meet at least one of the national CDBG objectives will be funded. The Jefferson County staff will review all invoices with the appropriate supporting documentation before issue payments. Inspections will also be performed before final payments are released.

Jefferson County will take appropriate action in all instances of noncompliance, fraud, and mismanagement including, but not limited to, disallowing ineligible costs, terminating contracts/agreements, and requiring repayment of funds.

Any non-housing projects involving new construction or rehabilitation of public facilities/infrastructure must provide proof of insurance and ownership to the Jefferson County Office of Community & Economic Development. The owner must also provide proof of any assistance previously provided through private hazard insurance, FEMA payments, SBA assistance or other sources for documentation against unduplicated benefits. The owner must further document the use of such assistance by providing receipts/invoices for already met needs to ensure non-duplication of benefits. The owner will be required to sign an affidavit as to the total amount of assistance received and the use of those proceeds. A checklist will be developed to facilitate this process.

Quality Assurance and Investigation

Jefferson County will monitor contractors and subrecipients on a regular basis to ensure quality assurance. Unannounced inspections and visits will be performed routinely. Any entity administering CDBG Disaster Recovery funding will be monitored not less than once during the contract period. The monitoring will address program compliance with contract provisions, including national objectives, financial management, and the requirements of 24 CFR Part 58. 13

Jefferson County will initiate an investigation through an independent party if there is reasonable cause to believe that funds received through the CDBG Disaster Recovery Grant has been misappropriated or misused, or that other fraudulent or unlawful conduct has occurred in relation to the operation of the contractual award.

Infrastructure/Public Facilities

All infrastructure and public facilities under construction will be monitored no less than once per week by the staff of the Jefferson County Office of Community & Economic Development to ensure compliance with all federal, state, and local regulations to include applicable Davis-Bacon requirements.

IX. FRAUD PREVENTION

Jefferson County is committed to compliance with all applicable federal regulations including OMB Circulars A-87, A-133, and 24 CFR Part 85. Jefferson County will emphasize prevention of fraud, abuse and mismanagement related to accounting, procurement, and accountability which may also be investigated. Jefferson County staff will monitor compliance related to applicants and contractors. The HUD Field Office will also monitor Jefferson County to ensure compliance.

Jefferson County will engage an independent Certified Public Accountant firm to conduct an audit of the CDBG Disaster Recovery program under the “Single Audit” requirements of A-133. Any findings or concerns will be reported directly to the Jefferson County Commission President.

X. GRANT CAPACITY

The staff of Jefferson County Community and Economic Department will receive adequate training to make sure that activities funded under this Action Plan are administered properly. As contracts are awarded, pre-construction conferences are held to ensure the contractors understand the compliance requirements as well as the consequence for non compliance.

XI. UNMET NEEDS/CDBG-DR GRANT ALLOCATION

**Proposed HUD Disaster Funding
By
Eligible Activity**

(\$7,847,084)

Activity	Projected # of Cases	Estimated Cost
1. Housing Rehabilitation	86	\$2,000,000.00
2. Safe rooms	25	250,000.00
3. Rebuilding	9	384,600.00
4. Debris Removal	57	332,464.83
5. Demolition	35	312,500.00
6. Public Facilities	4	1,925,456.57
7. Infrastructure	2	1,000,000.00
8. Non Housing Rehabilitation	1	25,000.00
9. Economic Development	1	10,000.00
10. Administration		392,354.20
11. Program Delivery		430,000.00
12. Contingency		\$784,708.40
	Total	\$7,847,084.00

XII. PERFORMANCE SCHEDULES

1) Housing

Year 1

25 homes rehabilitated
3 homes rebuilt
1 Down Payment/Closing Cost Assistance
7 safe rooms constructed

Year 2

30 homes rehabilitated
3 homes rebuilt
1 Down Payment/Closing Cost Assistance
9 safe rooms constructed

Year 3

31 homes rehabilitated
3 homes rebuilt
0 Down Payment/Closing Cost Assistance
9 safe rooms constructed

2) Infrastructure/Public Facilities

Year 3

2 Infrastructure Projects Completed
4 Public Facilities Completed
57 Cases of Debris Removal 100% Completed
1 Non-Housing Rehabilitation 100% Completed

3) Economic Development

Year 3

1 Micro-Loan

4) Administration

Jefferson County will use the maximum 5% of the award for administrative activities.

YEAR	EXPENDITURES	OUTCOMES
1	\$150,000.00	N/A
2	\$100,000.00	N/A
3	\$142,354.20	N/A

XIII. CITIZENS' PARTICIPATION

Citizens' Participation played an integral part in the development of this proposed CDBG-DR Action Plan as the Community & Economic Development staff held meetings in each affected area to determine the level of unmet needs still existing after all other resources had been exhausted.

The Final Amended Statement for the CDBG-DR Grant will be developed after receiving citizen comments and views during the 7-day comment period and also at a public hearing to be held on July 2, 2012 at 2:00 p.m. at the Jefferson County Office of Community & Economic Development 716 Richard Arrington Jr. Blvd. North, Suite A-420, Birmingham, Alabama, 35203. The Public Hearing will notify interested persons of the proposed activities for CDBG-DR as contained in this CDBG-DR Action Plan.

Written comments regarding the proposed plan must be received prior to 5:00 PM on July 5, 2012. Written comments should be submitted to the following by U.S. Postal Service:

Proposed CDBG-Disaster Recovery
Jefferson County Office of Community & Economic Development
716 Richard Arrington Jr Blvd N, Ste. A-430
Birmingham, AL 35203
Attn: Yolanda Caver

Or

Written comments can also be submitted prior to 5:00 PM on July 5, 2012 by electronic submission to the following:

To: burrellsy@jccal.org
Subject: CDBG-DR Comments

Special accommodations can be made available, upon request, for those with disabilities. Those needing special accommodations should contact the office at 205-325-5761 in advance.

AVAILABILITY OF THE PROPOSED CDBG-DR ACTION PLAN

Copies of this plan are available for review at the Jefferson County Office of Community & Economic Development, 716 Richard Arrington Jr. Blvd. North – Suite A430, Birmingham, AL 35203, by calling 325-5761, and online at <http://jeffconline.jccal.org/comdev/home/Home.html> in English and in Spanish. Arrangements can also be made available upon request to meet the Special Needs Requirements of those with disabilities and those who would like to request the proposed plan in other languages.

Any comments or views received during the 7-day comment period will be included prior to submittal to the U.S. Department of Housing and Urban Development. Jefferson County will also provide to HUD a written explanation of any comments not accepted along with a reason why those comments were not accepted.

Complaints

Jefferson County will accept complaints and criticisms on the CDBG-DR Action Plan, amendments and the Performance Report at any time. The County will respond to any written citizen complaint within fifteen (15) working days from the time of receipt. The procedure for responding to criticisms of the program will be handled as follows:

Complaints and grievances may be filed by any individual or group, a municipality, the County Commission, the Office of Community Development, the U.S. Department of Housing & Urban Development's Area Office, and any agency of the Federal Government, any member of Congress, or the Office of the President. Regardless of the origin of the complaint, or the first point of filing, it shall be reduced to writing, then based upon origin, it will be returned to the local government having direct jurisdiction.

If the complaint is based on a matter involving the Jefferson County CDBG-DR Program or other Consolidated/Action Plan programs, the Office of Community Development, must be notified, and will coordinate the local review and possible resolution of the complaint or grievance. Upon notification, the Office will insure that a complete and accurate response is made to the complainant within fifteen (15) days to discuss the matter. The major responsibility of the Office is to determine the functional and legal origins of the complaint, to address the validity of each, and to verify the geographical origin.

Complaints arising in municipalities in the Consortium, and particularly those which involve direct concern with municipal policy or administration shall be initially handled at the municipal level, with the assistance of the Office of Community Development. Should the complaints not be resolved at that level, the matter shall be referred to the County Commission. A complete record of correspondence, meetings, and research information shall be forwarded to the Commission upon referral. It shall not be the policy of the Office of Community Development to deal with complaints without the knowledge and direct involvement of local elected officials having jurisdiction, but the Office will provide staff support and technical assistance during the local review in a city or in the County.

If, after review and investigation at each level, the complainant is not satisfied with the outcome or does not voluntarily withdraw the complaint, he or she may proceed to the next level or other forms of relief.

Internal Complaint Procedure

All complainants shall be directed to the office of the Director of Jefferson County's Office of Community & Economic Development. The Director's office will direct the complaint to the appropriate division or office. The appropriate office shall respond to the complaint and notification shall be sent to the Director's Office that shall include a copy of the response.

Written complaints should be submitted to the following:

CDBG-DR Complaint

Jefferson County Office of Community & Economic Development

716 Richard Arrington Jr Blvd N, Ste. A-430

Birmingham, AL 35203

Attn: Frederick L. Hamilton

Amendments to the CDBG-DR Action Plan

As the program for CDBG-DR progresses Jefferson County may be required to make substantial changes to this CDBG-DR Action Plan. If any substantial changes are needed such as the addition or deletion of activities, changes in eligibility requirements, grant funding, or to shift money in excess of 25% of allocations, Jefferson County will prepare a Substantial Amendment to the CDBG-DR Action Plan and follow the required Citizens' Participation process to provide for a reasonable public notice, review, and comment on the proposed changes prior to submittal to HUD.

IX. CERTIFICATIONS