

# Community Development Block Grant – Disaster Recovery (CDBG-DR) Unmet Needs Assessment and Local Recovery Plan for Hurricanes Sally and Zeta

Mobile County, Alabama



# Record of Amendments

The following table summarizes amendments to the Mobile County Commission Unmet Needs Assessment and Local Recovery Plan for the 2020 Hurricanes Sally (DR-4563) and Zeta (DR-4573). Alabama Development of Economic and Community Affairs (ADECA) initially approved this UNA and LRP on XX.

*Summary of Mobile County Commission Unmet Needs Assessment and Local Recovery Plan Amendments*

| Date Amendment Approved by ADECA | Amendment Number | Description of Amendment |
|----------------------------------|------------------|--------------------------|
|                                  |                  |                          |
|                                  |                  |                          |
|                                  |                  |                          |
|                                  |                  |                          |
|                                  |                  |                          |
|                                  |                  |                          |
|                                  |                  |                          |

# Table of Contents

- Record of Amendments ..... 2**
- Unmet Needs Assessment Overview ..... 6**
  - Summary of Impact and Unmet Needs ..... 6
  - Purpose of Unmet Needs Assessment..... 9
  - Methodology and Structure of the Unmet Needs Assessment..... 11
  - Overview of Data Sources..... 13
  - Remaining Unmet Need by Activity ..... 14
  - Housing Unmet Need..... 14
  - Infrastructure and Public Facilities Improvements Unmet Need ..... 41
  - Mitigation Only Activities ..... 44
  - Outreach, Engagement and Stakeholder Consultation..... 48
- Local Recovery Plan ..... 55**
  - Proposed Use of Funds ..... 55
  - MID Recovery Zones..... 55
  - Program Details ..... 59
  - Infrastructure Program and Projects ..... 70
- Appendix A: Mobile County Outreach Efforts ..... 82**
- Appendix B: Public Engagement Questionnaires ..... 84**
- Appendix C: HMGP Match Projects..... 85**
- Appendix D: Non-Match Project List ..... 86**
- Appendix E: Summary of Public Comments ..... 89**
- Appendix F: County Responses to Public Comments..... 90**

# List of Tables

- Table 1 – Mobile County Commission CDBG-DR Funding Allocation..... 10
- Table 2 – Data Sources Utilized..... 13
- Table 3 – Overall Remaining Unmet Need by Category ..... 14
- Table 4 – The Housing Cost Burden Overview of Owners and Renters in Mobile County ..... 19
- Table 5 – Median Value of Owner-Occupied Housing Units..... 20
- Table 6 – Housing Type..... 21
- Table 7 – Mortgage Cost ..... 21
- Table 8 – Rent Cost..... 22
- Table 9 – FEMA IA Owner-Occupied Overview ..... 23
- Table 10 – FEMA IA Tenants Overview ..... 23
- Table 11 – FEMA IA Applicants by Housing Type ..... 23
- Table 12 – FEMA Real Property Damage Owner-Occupied Units ..... 25
- Table 13 – FEMA Real Property Damage Owner-Occupied Units ..... 25
- Table 14 – Number of Households without Flood Insurance ..... 26
- Table 15 – Number of Households without Homeowners Insurance ..... 26
- Table 16 – Total Number of Home Loans Approved by SBA ..... 27
- Table 17 – Summary of Housing Losses..... 28
- Table 18 – Summary of Housing Assistance..... 29
- Table 19 – Total Housing Unmet Need ..... 30
- Table 20 – Public Housing Authorities Damaged ..... 30
- Table 21 – Mobile County Population ..... 31
- Table 22 – HRAP Application in Process for Mobile County..... 39
- Table 23 – Summary of Infrastructure Unmet Need by Program ..... 41
- Table 24 – The Estimated Cost per FEMA PA Category A-G ..... 42
- Table 25 – Total PA Project Amount Plus Resiliency and Building/Materials Increase..... 43
- Table 26 – Total Estimated HMGP Non-Federal Cost Share Unmet Need..... 43
- Table 27 – Non-match Projects and Related Unmet Need ..... 44
- Table 28 – Proposed Use of Funds..... 55
- Table 29 - MID Recovery Zone Census Tracts ..... 57

# List of Figures

- Figure 1 – Mobile County LMI By Census Tract..... 17
- Figure 2 – Median Home Values BY MOBILE County, Alabama..... 18
- Figure 3 – Mobile County SVI - Socioeconomic Status..... 34
- Figure 4 – Mobile County SVI - Housing Characteristics..... 35
- Figure 5 – Mobile County SVI - Racial and Ethnic Minority Status..... 36
- Figure 6 – Mobile County SVI - Housing Type and Transportation..... 37
- Figure 7 – Mobile County Overall SVI..... 38
- Figure 8 – Mobile County SFHA Map ..... 47
- Figure 9 – Overall Social Vulnerability Categories ..... 56
- Figure 10 – Mobile County MID Recovery Zones Map ..... 58
- Figure 11 – Voluntary Homeowner Buyout LMA Map ..... 62
- Figure 12 – Location Map of the Proposed Disaster Shelter ..... 74
- Figure 13 – Proposed First Responder Safe Shelter Design ..... 76
- Figure 14 – Woodland Drive Dam Project Map ..... 80

# Unmet Needs Assessment Overview

## Summary of Impact and Unmet Needs

As per the United States Department of Housing and Urban Development's (HUD) [Federal Register Notice \(FRN\) published on May 24, 2022](#) – 87 FR 31636 (May 24 Notice)<sup>1</sup>, the County is recognized as a HUD-designated Hardest Hit Most Impacted and Distressed (HHMID)<sup>2</sup>. Following the completion of its own Action Plan and UNA, ADECA entered into a subrecipient agreement<sup>3</sup> (SRA) with the County to plan and implement recovery programs and/or projects. The SRA requires the County to develop a UNA and Local Recovery Plan. Both the FRN and Action Plan provide guidance on how to complete an unmet needs assessment as an HHMID area including data sources, methodological processes, and specifically how to calculate unmet needs for each sector.

### **Federal Register Notice Summary & Allocation of CDBG-DR funds**

87 FR 6364 – Published on February 3, 2022 (February 3 Notice): This Notice allocated a total of \$311,732,000 in CDBG-DR funds to the State of Alabama for FEMA disaster numbers 4563 (Hurricane Sally) and 4573 (Hurricane Zeta). At least 80 percent of the CDBG-DR allocation must address unmet disaster needs or mitigation activities in the HUD-defined most impacted and distressed (MID) areas. Mobile County, Baldwin County, and Zip Code 36502 in Escambia County were identified as MID areas.

87 FR 31636 – Published on May 24, 2022 (May 24 Notice): This Notice allocated an additional \$189,520,000 in CDBG-DR funds to the State of Alabama to recover from Hurricanes Sally and Zeta. The total allocation in CDBG-DR funds increased to \$501,252,000. The MID areas were expanded to include all of Escambia County and Zip Code 36545 in Clarke County.

HUD defines “unmet needs” as resources necessary to recovery from a disaster that are not addressed by other sources of funds, by accounting for the various forms of assistance available to, or likely to be available to, affected communities (e.g., Federal Emergency Management Agency Public Assistance funds) and individuals (e.g., estimated homeowner’s insurance) proceeds, other federal assistance, or any other funding sources. Any remaining need, after accounting for all support, represents the overall unmet need. The County’s current unmet needs across HUD’s defined sector categories are detailed in the following sections:

---

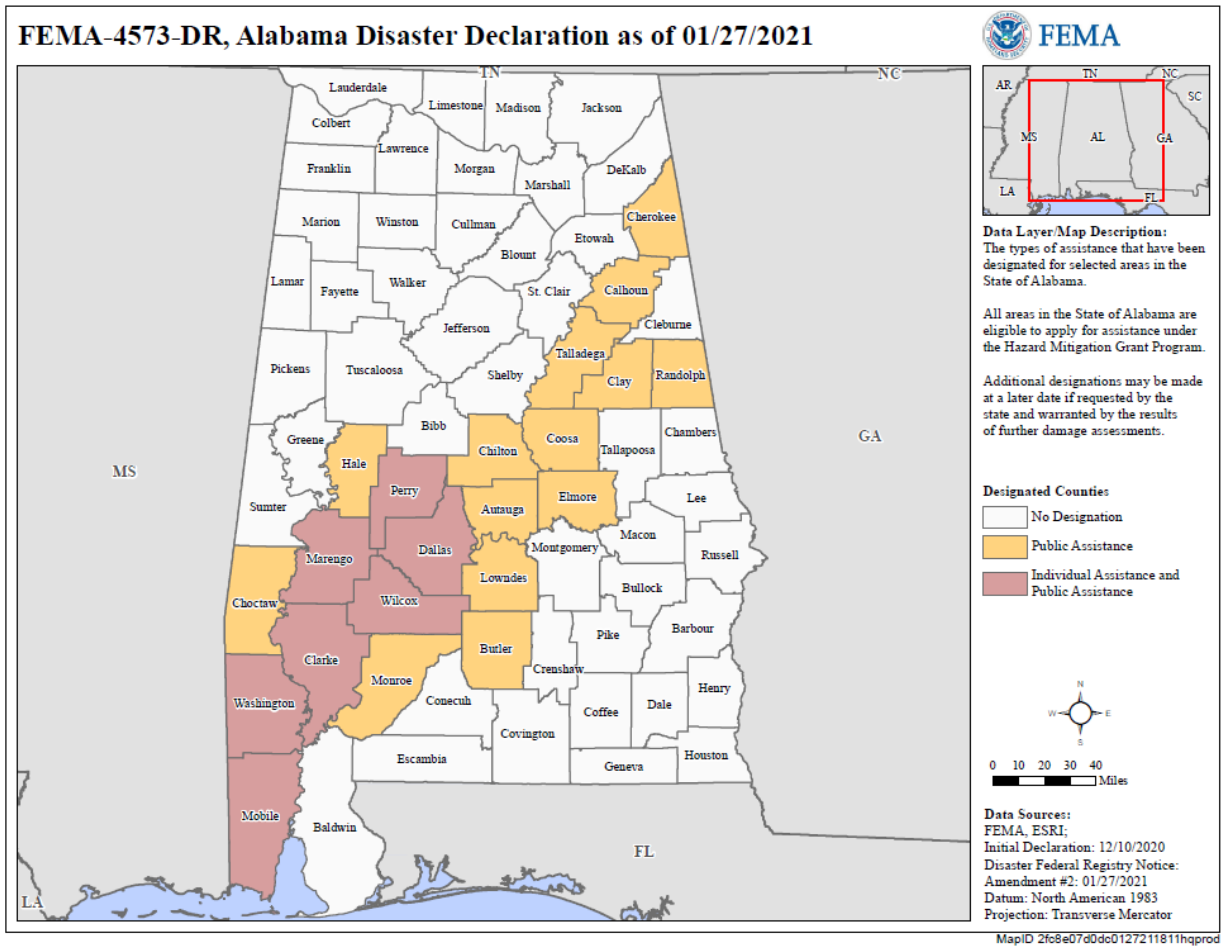
<sup>1</sup> <https://adeca.alabama.gov/wp-content/uploads/Alabama-DRGR-Public-Action-Plan-Approved-1.12.23.pdf>

<sup>2</sup> HUD identified four Hurricane Sally and Zeta-impacted counties as the Most Impacted and Distressed (MID) areas in Alabama—Baldwin, Clarke, Escambia, and Mobile.

<sup>3</sup> <https://adeca.alabama.gov/wp-content/uploads/Mobile-County-DR-21-003-Agreement.pdf>



Figure 2 – Zeta FEMA-4573-DR Disaster Declaration Map



Source: [https://gis.fema.gov/maps/dec\\_4573.pdf](https://gis.fema.gov/maps/dec_4573.pdf)

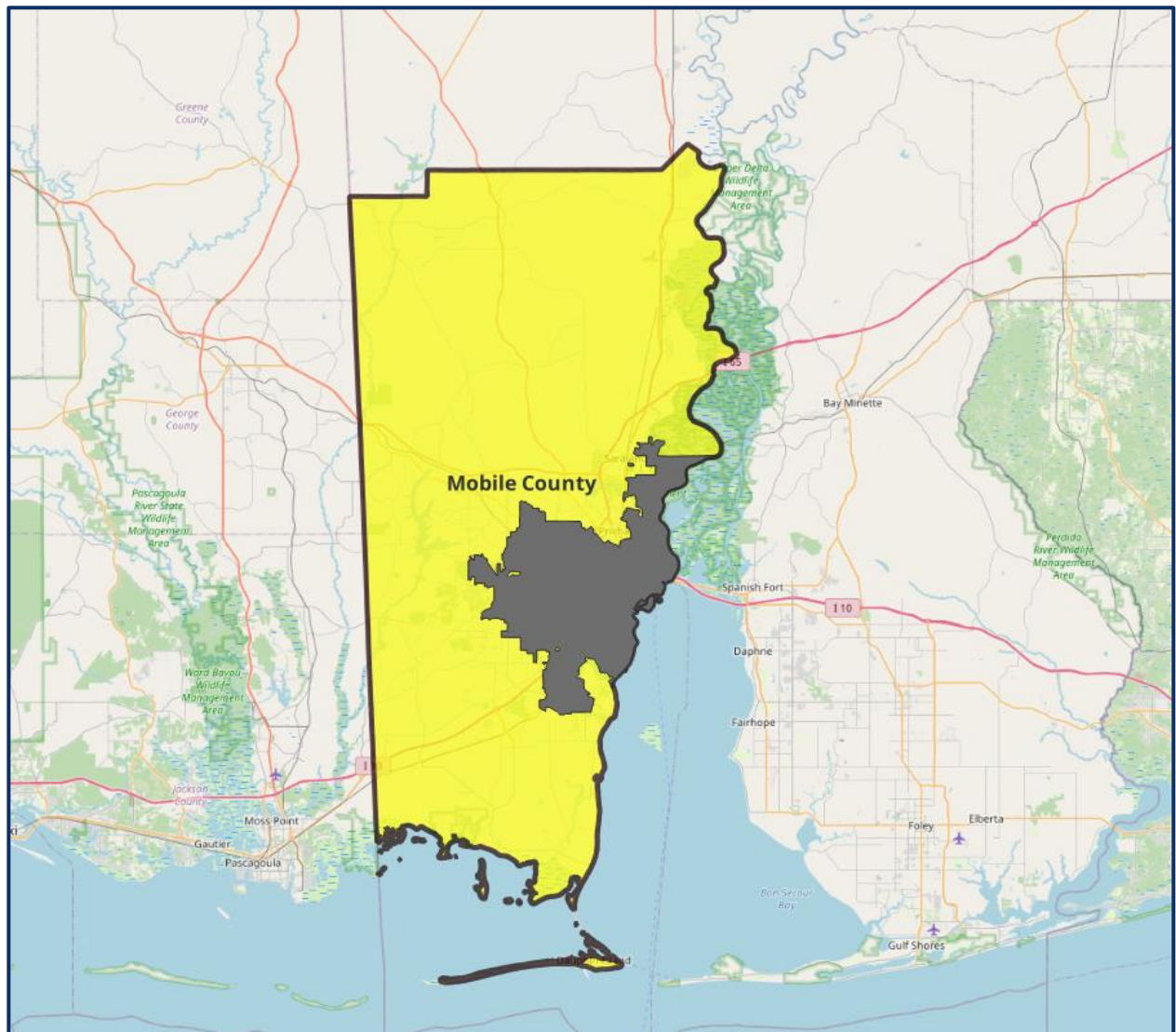


## Purpose of Unmet Needs Assessment

Mobile County (County) has completed the following Unmet Needs Assessment (UNA) to identify the impacts, long-term needs, and priorities for the \$28,379,808 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funding allocated by the Alabama Department of Economic and Community Affairs (ADECA) for the 2020 Hurricanes Sally (DR-4563) and Zeta (DR-4573). The City of Mobile received a separate allocation and is therefore not covered by this UNA.

*Figure 3 – Location of Mobile County, AL*

(the area of the City of Mobile is shown in gray and the area outside of the City limits is shown in yellow)<sup>5</sup>



<sup>5</sup> Map prepared by Mobile County using U.S. Census and City of Mobile Data

This assessment is intended to build upon and supplement ADECA’s 2022 CDBG-DR Action Plan<sup>6</sup> UNA for housing, infrastructure, economic revitalization, public services, and mitigation, where necessary. In addition, ADECA’s Action Plan Amendment Number Two (non-substantial) was utilized when developing this UNA. The non-substantial amendment highlighted the July 18, 2023 annexation referendum, where voters in three areas of West Mobile (unincorporated Mobile County) voted to incorporate into the City of Mobile. The annexation was made up of three areas of West Mobile: Cottage Hill, King’s Branch, and Orchard Creek. On July 25, 2023, those votes were certified, and the City of Mobile officially annexed the three adjacent communities. The annexation impacted the original Method of Distribution to the City of Mobile and Mobile County since the Real Property FEMA Verified Loss (RPFVL) of the annexed areas shifted from the Mobile County to the City of Mobile. The annexation resulted in an additional 19,789 residents being shifted into the City of Mobile. Additionally, the total RPFVL increased by \$1,032,733 for the City of Mobile<sup>7</sup>. As a result of these reductions, the County narrowed its targeted areas to exclude the three annexed areas of West Mobile when preparing and analyzing the data for the UNA.

This assessment considers pre-disaster needs as well as unmet recovery needs resulting from both Hurricanes, at a moment in time, for all areas in Mobile County (outside of the City limits of Mobile), see Figure 1. The data and analysis provided in this report, along with the County’s history of managing Community Development Block Grant (CDBG) programs, will further enhance its ability to manage the CDBG-DR funding as a subrecipient to ADECA. See **Table 1** for the allocation of CDBG-DR funding.

*Table 1 – Mobile County Commission CDBG-DR Funding Allocation*

| <b>Activity</b>         | <b>Allocation</b>   |
|-------------------------|---------------------|
| Housing                 | \$12,135,432        |
| Non-Housing             | \$15,244,376        |
| Planning                | \$1,000,000         |
| <b>Total Allocation</b> | <b>\$28,379,808</b> |

Additionally, it is important to note that upon ADECA’s assessment of the unmet needs across HUD’s Most Impacted and Distressed (MID) area in the state, it was found that housing activities were the greatest unmet need. In an effort to mitigate this need, ADECA chose to create and manage the housing repair and replacement program, allocating a large portion of the housing allocation to this program. Consequently, direct affordable housing allocation to the Mobile County Commission is less than the infrastructure allocation even though the greatest unmet need is still affordable housing.

<sup>6</sup> <https://adeca.alabama.gov/wp-content/uploads/Alabama-DRGR-Public-Action-Plan-Approved-1.12.23.pdf>

<sup>7</sup> <https://adeca.alabama.gov/wp-content/uploads/DRGR-Public-Action-Plan-Non-Substantial-Amendment-2-Summary-of-Changes.pdf>

## Impacts of Hurricanes Sally and Zeta on Mobile County

During the latter part of 2020, both Hurricanes Sally and Zeta had significant impacts on Mobile County, Alabama. The impacts outlined below were devastating for residents of the County and lead to a subsequent need to focus on rebuilding and recovery efforts. While each storm brought its own community impacts, together they brought mass devastation. The impacts noted below informed how Mobile County has targeted its recovery efforts.<sup>8</sup>

### Hurricane Sally

Hurricane Sally brought unprecedented rainfall, which lead to widespread flooding across Mobile County. A few areas experienced an astounding 29 inches in rainfall, which caused rivers to overflow and residential flooding. Sally produced excessively strong winds, causing damage to trees, power lines, and infrastructure. The flooding and debris overwhelmed many roads and bridges which had already sustained damage making recovery efforts urgent. This damage created massive barriers for emergency services as they tried to reach the impacted areas. Due to the mass amounts of rainfall and power loss, many residents were forced to evacuate their homes and seek shelter with family, friends or in a community shelter. The damage to residential homes and the residents of those homes brought to light the need for additional disaster shelter throughout the community in the event that another disaster occurs.

### Hurricane Zeta

Hurricane Zeta was primarily a wind event. The wildly strong winds caused damage to structures already weakened or damaged by Hurricane Sally. Power outages were widespread across the County, with many residents going without power for over a week. Hurricane Zeta uprooted trees and created large amounts of debris, further exacerbating the damage from Hurricane Sally. Due to a second round of debris, cleanup and recovery efforts were delayed and, in some cases, had to be started a second time. While Hurricane Zeta mainly impacted the County with wind, some areas experienced localized flooding due to heavy rainfall, which further tested the limits of already overwhelmed drainage systems.

The cumulative effects of both Hurricanes Sally and Zeta highlighted community vulnerabilities in infrastructure and disaster readiness. These weaknesses have led to discussions regarding resiliency improvements in an effort to mitigate against future disasters.

---

<sup>8</sup> [https://www.nhc.noaa.gov/data/tcr/AL192020\\_Sally.pdf](https://www.nhc.noaa.gov/data/tcr/AL192020_Sally.pdf)

# Methodology and Structure of the Unmet Needs Assessment

The County conducted this assessment with a very targeted approach so as to not duplicate the efforts of the UNA within ADECA’s 2022 CDBG-DR Action Plan and any following amendments to date.

**Figure** outlines the Unmet Needs Assessment Process Flow used by the Mobile County Commission.

Figure 4 – Unmet Needs Assessment Process Flow



Below outlines the methodology used by the County for each step of the process:

## STEP ONE: DEVELOP ASSESSMENT TOOLS AND DATA SETS

- The research methods and data collection techniques that were used to help gather and analyze the data were surveys, questionnaires, interviews, focus groups, and mapping tools.

## STEP TWO: DATA COLLECTION

- The County conducted multiple public engagement meetings along with one-on-one municipal, tribal and special district meetings. The data collected at each of these meetings includes, but was not limited to:
  - Affected population
  - Impacted areas
  - Impacted physical and social needs
  - Existing community resources and additional available services
  - Identification of gaps and areas of unmet needs throughout the community

## STEP THREE: ANALYZE DATA

- When analyzing the data collected, the County:

- Reviewed the collected data against the data provided in the State Action Plan and Unmet Needs Assessment
- Identified common themes of unmet need throughout the County
- Considered demographic, geographic, and socio-economic factors

**STEP FOUR: DETERMINE STRATEGIES**

- When determining strategies, the County looked at creative and sustainable solutions that would address the identified unmet needs based on the data. Examples of this include, but are not limited to:
  - Infrastructure Improvement
  - Resilient Housing Solutions
  - Hardening of a Critical Facility
  - Economic Revitalization to aid the economic security of the community

**STEP FIVE: PRIORITIZE NEEDS**

- The County prioritized the unmet needs based on their severity, impact specifically on low-to-moderate income (LMI), vulnerable, hard-to-reach, and/or protected class communities, and feasibility of addressing them.

**STEP SIX: REPORT AND COMMUNICATE THE UNMET NEEDS**

- In this final step, the County presented the key needs via an updated and localized unmet need assessment. The assessment also highlights specific vulnerabilities or disparities within the affected populations and impacted areas.

## Overview of Data Sources

The sources of data utilized for this assessment include those listed in **Table 2**.

*Table 2 – Data Sources Utilized*

| <b>Data</b>                                    | <b>Source</b>   |
|--|---|
| <b>Presidential Disaster Declaration Areas</b> | FEMA  |
| <b>Most Impacted and Distressed Area</b>       | HUD   |
| <b>Housing</b>                                 | FEMA Individual Assistance, Small Business Administration (SBA), Mobile County Housing Authorities  |
| <b>Infrastructure</b>                          | FEMA Public Assistance (PA), FEMA Hazard Mitigation Grant Program, Mobile County, Local Municipalities, Indian Tribes, Special Districts  |
| <b>Socioeconomic and Demographic Data</b>      | U.S. Census Bureau (Decennial Census and American Community Survey), Centers for Disease Control and Prevention and Agency for Toxic Substances and Disease Registry Social Vulnerability Index (SVI) |

| Data                          | Source                                       |
|-------------------------------|--|
| Low- and Moderate-Income Data | HUD  |
| Mitigation                    | Alabama Region A 2021 Hazard Mitigation Plan |

## Remaining Unmet Need by Activity

Table 3 – Overall Remaining Unmet Need by Category

| Category                       | Remaining Unmet Need    | % of Unmet Need | Allocation          | % of Allocation |
|--------------------------------|-------------------------|-----------------|---------------------|-----------------|
| Housing                        | \$68,222,867.00         | 41.63%          | \$12,135,432        | 44.32%          |
| Non-Housing/<br>Infrastructure | \$95,659,035.80         | 58.37%          | \$15,244,376        | 55.68%          |
| <b>Total</b>                   | <b>\$163,881,902.80</b> | <b>100%</b>     | <b>\$27,379,808</b> | <b>100%</b>     |

## Housing Unmet Need

Hurricanes Sally and Zeta had significant impacts on the housing structures in Mobile County. This section examines the damage as identified in (the best available) data to fully understand the impacts to owner-occupied and rental housing within the County.

### Limitations of Data

A single data source does not provide sufficient accurate information, so multiple sources were used to understand the full extent of needs in Mobile County following both Hurricanes. It is important to note that the data in this assessment includes that incorporated into the state’s unmet needs analysis and reflects the best available supplemental data at that point in time that this document was prepared.

- FEMA Individual Assistance (IA):** The FEMA IA Program is the primary source of data on impacted households and for calculating unmet housing recovery need for CDBG-DR grantees. Following a disaster, homeowners and renters voluntarily register for FEMA IA. FEMA Verified Loss awards only provide assistance with repair and replacement to restore a home to habitable conditions. While the FEMA IA dataset does not present the full scale of the disaster impacts and often underestimates need, the data available at the household level is nonetheless useful. The data includes a range of income and real property damage estimates and allows for an analysis consistent with the unmet needs calculation outlined in HUD’s February 3, 2022 Federal Register Notice which provided an initial allocation to

Alabama. Mobile County received address-level data and used the data to identify households in Mobile County but outside of the incorporated area of the City of Mobile.

- **Small Business Administration (SBA):** Similar to FEMA IA, the SBA disaster loan program is a recovery resource available to impacted households. As the program provides loans for housing repairs, the data skews towards homeowners. While the FEMA IA data reflects the cost for repair to habitable conditions, the SBA loan estimates are based on an inspection that covers the full cost to restore a home. Mobile County received address-level data and used the data to identify households in Mobile County but outside of the incorporated area of the City of Mobile.
- **Insurance Claims:** Mobile County has requested but did not receive household level insurance claim information for homeowner's insurance and National Flood Insurance Program (NFIP). Summarized NFIP claim data at the County level was unavailable and Mobile County used insurance data embedded in the FEMA IA and SBA datasets to prepare estimates of insurance assistance disbursed when calculating the unmet need for housing.
- **American Community Survey:** The American Community Survey (ACS) is updated annually and is based on a sample of United States residents of 3.5 million in the 50 states. ACS data was used to capture socioeconomic and demographic data. The ACS asks more comprehensive questions than the ten-year census with the goal of "providing current information to communities every year... for programs, economic development, emergency management, and understanding local issues and conditions."
- **Public Housing Damage:** Mobile County requested damage and unmet need information from the three local PHAs (Mobile County Housing Authority, City of Prichard Housing Authority and Chickasaw Housing Authority).

## Impacts on Housing

Prior to Hurricanes Sally and Zeta, the housing market in Mobile County was expanding. Housing construction was steadily growing with the development and availability of single-family homes with a wide affordability range<sup>9</sup>.

Post Hurricanes Sally and Zeta, the housing market has seen an increase in need due to homes damaged or demolished by the storms from wind, rain and flooding. Damages have resulted in homes being uninhabitable, exacerbating the pre-storm shortage of available affordable housing. These shortages and increases in demand have driven up the cost of homes throughout the community, making it harder for those with a limited income range to obtain housing. Individuals currently living in public housing projects are particularly burdened by the damage caused by the storms to their dwellings, as their affordability range is among the lowest in the County.

---

<sup>9</sup> <https://www.huduser.gov/portal/publications/pdf/MobileAL-CHMA-19.pdf>

Homeowners insurance has been greatly impacted by the damage caused by Hurricanes Sally and Zeta. Insurers have chosen to impose stricter coverage requirements and, as a result, availability of property insurance has declined while rates have increased significantly since 2020. This is worsened by the southern region of Alabama being near coastal lines and prone to natural disasters. While each individual policy can vary, it is reported that on average some homeowners have seen a rate increase of approximately 7.6 percent<sup>10</sup> nationally.

Furthermore, the storms have highlighted the need to evaluate current building codes and regulations and enforcement to make new construction and rehabilitated structures more resilient to future storms.

## Single Family Housing Impact

Significant damage occurred to single-family homes throughout the community as a result of both hurricanes. To address the impacted communities' housing needs, ADECA created the Home Recovery Alabama Program (HRAP)<sup>11</sup> that addresses individual homeowner repairs and replacements. This program will be managed by ADECA and is a separate standalone allocation beyond what has been allocated directly to the County. During the program's application phase, the Mobile County Commission attended and assisted with the coordination of community meetings.

The Mobile County Commission will continue assisting with the coordination of events regarding the HRAP as requested by ADECA. While individual assistance remains the highest priority of the Mobile County Commission, this assessment will focus on the community's Affordable Housing needs and not the individual homeowner assistance needs.

Per the subrecipient agreement with ADECA, \$12,135,432 of the total awarded allocation must be spent on housing related activities. The total amount allocated by ADECA does not reflect the total amount of unmet need in Mobile County. The allocation is only a portion of the funds being used on housing as ADECA is managing the bulk of the housing allocation through HRAP. Based on the amount allocated, the Mobile County Commission has taken cost reasonableness and project feasibility into account when developing potential uses of the affordable housing funding.

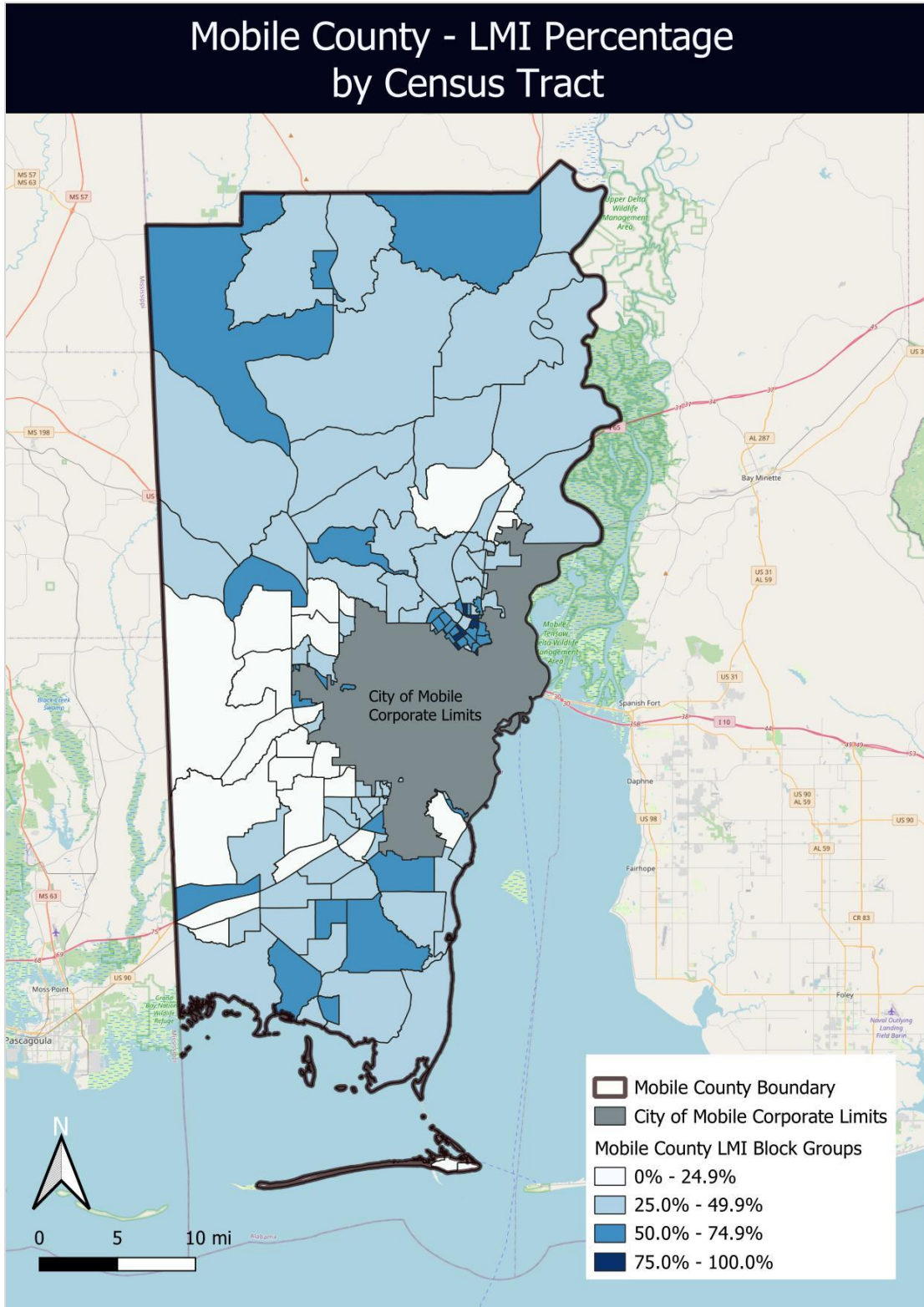
---

<sup>10</sup> <https://www.iii.org/fact-statistic/facts-statistics-homeowners-and-renters-insurance>

<sup>11</sup> <https://adeca.alabama.gov/cdbg-disaster-recovery/hurricanes-sally-and-zeta/>



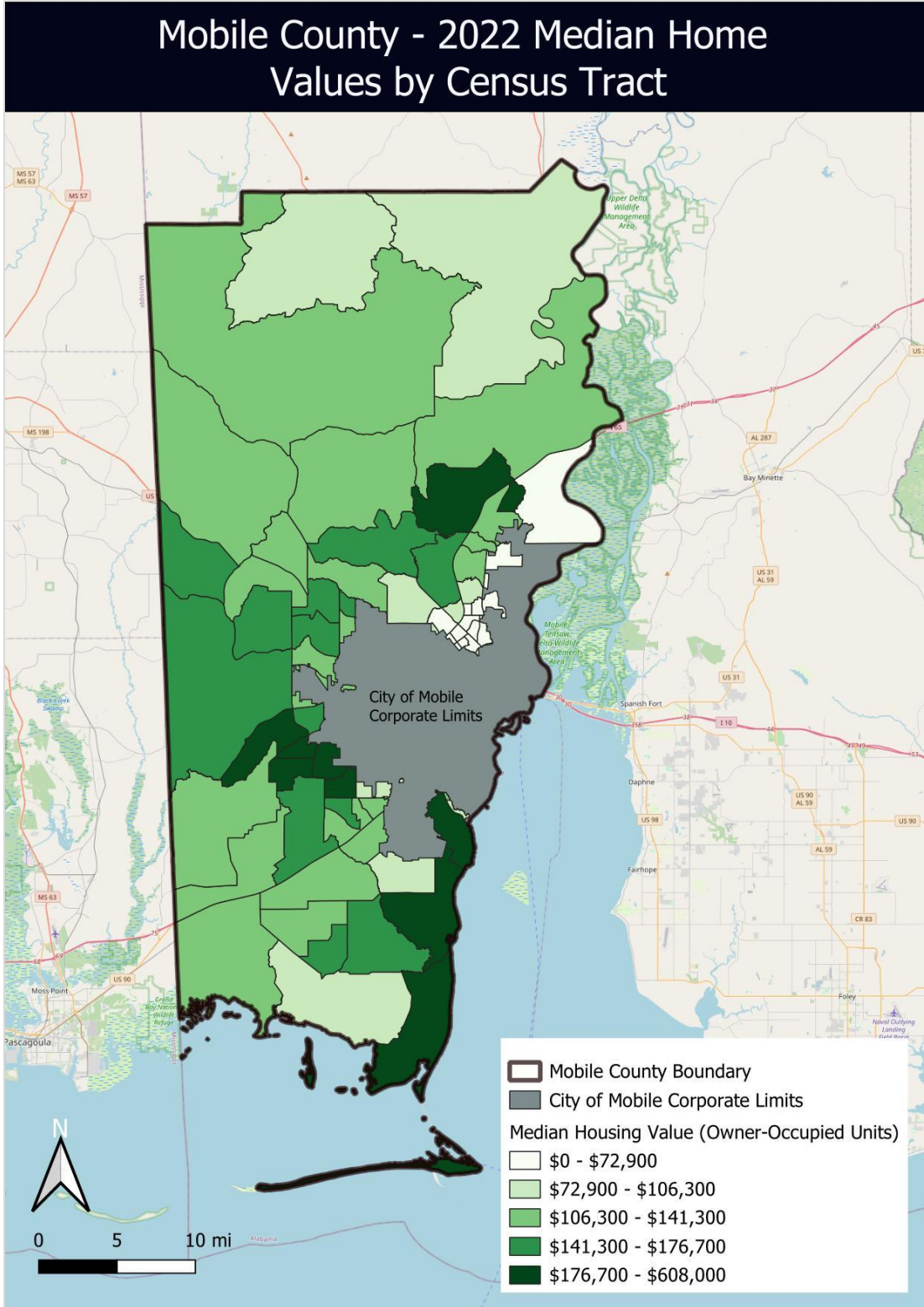
Figure 1 – Mobile County LMI By Census Tract



Source: HUD LMI Data<sup>12</sup>

<sup>12</sup> <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::low-to-moderate-income-population-by-block-group/about>

Figure 2 – Median Home Values BY MOBILE County, Alabama



Source: ArcGIS – 2022 USA Median Home Value<sup>13</sup>

<sup>13</sup> <https://www.arcgis.com/home/item.html?id=d878a91b201b401a94640400511a4f0e>

## Affordability

High housing costs impact the amount of money households can use or save for other essential and nonessential expenses. Typically, households that spend 30% or more of their income on housing are considered rent burdened. Recognizing the affordability issues for renters and owners throughout the County, Comprehensive Housing Affordability Strategy (CHAS) data has been analyzed to determine the extent of local affordability issues based on the best-available data for this assessment. Each year, HUD receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. CHAS data demonstrates the extent of housing problems and housing needs, particularly for low-income households.

Demonstrating the scale of households with high housing costs, **Table 4** provides an overview of the housing cost burden for owners and renters within Mobile County. HUD defines cost burden<sup>14</sup> ratio as “the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost includes mortgage payment, utilities, association fees, insurance, and real estate taxes.”<sup>15</sup>

Mobile County renters experience cost burden at higher rates than owners. In 2022, approximately 15.72% of owners paid over 35% or more of their income on housing compared to approximately 40.31% of renters that paid over 35% or more of their income on rent. Owners have seen their cost burden drop from 19.43% in 2017 to 15.72% in 2022, while the percentage of renters paying over 35% of their income on rent stayed nearly steady from 41.48% in 2017 to 40.31% in 2022. Providing more affordable rental units through new construction may help to reduce the percentage of renters who are severely cost burdened. Home purchase assistance may also assist to transition some renters to owners.

*Table 4 – The Housing Cost Burden Overview of Owners and Renters in Mobile County<sup>16</sup>*

| Mortgage Cost as a Portion of Household Income | 2017          |             | 2020          |             | 2022          |             |
|--|---------------|-------------|---------------|-------------|---------------|-------------|
|  | Number        | Percent     | Number        | Percent     | Number        | Percent     |
| Less than 20.0%                                | 15,001        | 48.81%      | 15,490        | 52.35%      | 16,284        | 53.12%      |
| 20.0% to 24.9%                                 | 4,779         | 15.55%      | 4,370         | 14.77%      | 4,668         | 15.23%      |
| 25.0% to 29.9%                                 | 2,961         | 9.64%       | 3,033         | 10.25%      | 3,080         | 10.05%      |
| 30.0% to 34.9%                                 | 2,020         | 6.57%       | 1,754         | 5.93%       | 1,805         | 5.89%       |
| 35.0% or more                                  | 5,970         | 19.43%      | 4,942         | 16.70%      | 4,818         | 15.72%      |
| <b>Total Occupied units paying a mortgage</b>  | <b>30,731</b> | <b>100%</b> | <b>29,589</b> | <b>100%</b> | <b>30,655</b> | <b>100%</b> |

<sup>14</sup> [https://www.huduser.gov/portal/datasets/cp/CHAS/bg\\_chas.html](https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html)

<sup>15</sup> [https://www.huduser.gov/portal/datasets/cp/CHAS/bg\\_chas.html](https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html)

<sup>16</sup> <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::acs-5yr-chas-estimate-data-by-tract/about>

| Rent Cost as a Portion of Household Income | 2017          |             | 2020          |             | 2022          |             |
|--|---------------|-------------|---------------|-------------|---------------|-------------|
|  | Number        | Percent     | Number        | Percent     | Number        | Percent     |
| Less than 15.0%                            | 1,613         | 12.58%      | 2,047         | 14.76%      | 2,406         | 17.17%      |
| 15.0% to 19.9%                             | 1,634         | 12.75%      | 1,635         | 11.79%      | 1,371         | 9.79%       |
| 20.0% to 24.9%                             | 1,614         | 12.59%      | 1,660         | 11.97%      | 1,468         | 10.48%      |
| 25.0% to 29.9%                             | 1,359         | 10.60%      | 1,555         | 11.22%      | 1,599         | 11.41%      |
| 30.0% to 34.9%                             | 1,281         | 9.99%       | 1,580         | 11.40%      | 1,519         | 10.84%      |
| 35.0% or more                              | 5,317         | 41.48%      | 5,388         | 38.86%      | 5,647         | 40.31%      |
| <b>Total occupied units paying a rent</b>  | <b>12,818</b> | <b>100%</b> | <b>13,865</b> | <b>100%</b> | <b>14,010</b> | <b>100%</b> |

Source: 2017, 2020, 2022 U.S. Census ACS 5-year estimates

## MEDIAN VALUE

The median value of owner-occupied housing has increased in Mobile County from \$124,500 in 2017, to \$138,400 in 2020, and then a large increase in median value up to \$180,300 in 2022 (shown in **Table 5** below). Such a large increase after a major disaster in such a short period of time makes homeownership even harder to obtain for residents of Mobile County. Much of the more affordable housing stock can be found in the rural areas of Mobile County, away from the main employment area of the City of Mobile and its suburbs, and in the Prichard area which is an area with significant LMI population. The areas with highest median values are in the west suburbs of the City of Mobile and along the Mobile Bay.

Table 5 – Median Value of Owner-Occupied Housing Units

| Median Value of Owner-occupied Housing Units | 2017      | 2020      | 2022      |
|--|-----------|-----------|-----------|
| Median Value in Mobile County, AL            | \$124,500 | \$138,400 | \$180,300 |

Source: 2017, 2020, 2022 U.S. Census ACS 5-year estimates

## HOUSING TYPE

Since 2017 and even despite Hurricanes Sally and Zeta, Mobile County (excluding the City of Mobile) has seen an increase in housing units with 79,472 in 2017, 81,403 in 2020, and 82,761 in 2022 (see *Error! Reference source not found.6*). Mobile County has seen a near doubling of multi-family developments with 10 to 19 units (from 786 developments in 2017 to 1,206 in 2022) and 20 or more units (641 in 2017 to 1,202 in 2022), suggesting there is a high demand for affordable multi-family housing. An area of concern is the sharp increase in the number of individuals living in boats, RVs, or vans (90 in 2017 to 374 in 2022). This shows that there is likely still a demand for

more affordable housing that would be more resilient against future hurricane damage and other disasters.

### MORTGAGE AND RENT COST

Housing costs have increased in Mobile County for both owners and renters since 2017. The median mortgage was \$1,063 in 2017, \$1,162 in 2020, and \$1,298 in 2022. For renters, the median rent cost was \$869 in 2017, \$890 in 2020, and \$968 in 2022 (see *Error! Reference source not found.7 and 8*).

Table 6 – Housing Type

| Housing Type               | 2017          |               | 2020          |               | 2022          |               |
|----------------------------|---------------|---------------|---------------|---------------|---------------|---------------|
|                            | Number        | Percent       | Number        | Percent       | Number        | Percent       |
| 1-Unit, Detached           | 61,488        | 77.4%         | 63,946        | 78.6%         | 65,002        | 78.5%         |
| 1-Unit, Attached           | 286           | 0.4%          | 344           | 0.4%          | 565           | 0.7%          |
| 2 Units                    | 1,047         | 1.3%          | 885           | 1.1%          | 818           | 1.0%          |
| 3 or 4 Units               | 1,164         | 1.5%          | 808           | 1.0%          | 714           | 0.9%          |
| 5 to 9 Units               | 1,460         | 1.8%          | 1,267         | 1.6%          | 1,261         | 1.5%          |
| 10 to 19 Units             | 786           | 1.0%          | 1,091         | 1.3%          | 1,206         | 1.5%          |
| 20 or More Units           | 641           | 0.8%          | 1,041         | 1.3%          | 1,202         | 1.5%          |
| Mobile Home                | 12,510        | 15.7%         | 11,648        | 14.3%         | 11,619        | 14.0%         |
| Boat, RV, Van, etc.        | 90            | 0.1%          | 373           | 0.5%          | 374           | 0.5%          |
| <b>Total Housing Units</b> | <b>79,472</b> | <b>100.0%</b> | <b>81,403</b> | <b>100.0%</b> | <b>82,761</b> | <b>100.0%</b> |

Source: 2017, 2020, 2022 U.S. Census ACS 5-year estimates

Table 7 – Mortgage Cost

| Mortgage Cost      | 2017   |         | 2020   |         | 2022   |         |
|--------------------|--------|---------|--------|---------|--------|---------|
|                    | Number | Percent | Number | Percent | Number | Percent |
| Less than \$500    | 963    | 3.11%   | 578    | 1.94%   | 526    | 1.71%   |
| \$500 to \$999     | 10,573 | 34.15%  | 8,549  | 28.72%  | 5,969  | 19.38%  |
| \$1,000 to \$1,499 | 12,108 | 39.11%  | 11,769 | 39.53%  | 12,874 | 41.79%  |
| \$1,500 to \$1,999 | 4,957  | 16.01%  | 6,138  | 20.62%  | 7,387  | 23.98%  |
| \$2,000 to \$2,499 | 1,441  | 4.65%   | 1,379  | 4.63%   | 2,328  | 7.56%   |
| \$2,500 to \$2,999 | 577    | 1.86%   | 874    | 2.94%   | 1,159  | 3.76%   |
| \$3,000 or more    | 337    | 1.09%   | 484    | 1.63%   | 564    | 1.83%   |

|                                       |                |  |                |  |                |  |
|---------------------------------------|----------------|--|----------------|--|----------------|--|
| <b>Occupied units paying mortgage</b> | <b>30,956</b>  |  | <b>29,771</b>  |  | <b>30,807</b>  |  |
| <b>Median mortgage cost</b>           | <b>\$1,063</b> |  | <b>\$1,162</b> |  | <b>\$1,298</b> |  |

Source: 2017, 2020, 2022 U.S. Census ACS 5-year estimates

Table 8 – Rent Cost

| Rent Cost                         | 2017          |         | 2020          |             | 2022          |             |
|-----------------------------------|---------------|---------|---------------|-------------|---------------|-------------|
|                                   | Number        | Percent | Number        | Percent     | Number        | Percent     |
| Less than \$500                   | 1,848         | 13.91%  | 2291          | 16.02%      | 2206          | 15.32%      |
| \$500 to \$999                    | 7,463         | 56.18%  | 7538          | 52.70%      | 6333          | 43.99%      |
| \$1,000 to \$1,499                | 3,527         | 26.55%  | 3912          | 27.35%      | 4705          | 32.68%      |
| \$1,500 to \$1,999                | 364           | 2.74%   | 486           | 3.40%       | 988           | 6.86%       |
| \$2,000 to \$2,499                | 82            | 0.62%   | 77            | 0.54%       | 51            | 0.35%       |
| \$2,500 to \$2,999                | 0             | 0.00%   | 0             | 0.00%       | 115           | 0.80%       |
| \$3,000 or more                   | 0             | 0.00%   | 0             | 0.00%       | 0             | 0.00%       |
| <b>Occupied units paying rent</b> | <b>13,284</b> |         | <b>14,304</b> | <b>100%</b> | <b>14,398</b> | <b>100%</b> |
| <b>Median rent cost</b>           | <b>\$869</b>  |         | <b>\$890</b>  |             | <b>\$968</b>  |             |

Source: 2017, 2020, 2022 U.S. Census ACS 5-year estimates

## FEMA Individual Assistance

The FEMA IA Program is the primary basis for establishing housing unmet recovery need for CDBG-DR grantees and subrecipients, despite the data limitations in the program. Residents must voluntarily register with FEMA for assistance after a disaster, which leaves a gap between the true disaster impacts and the households that register for assistance. Despite these limitations, FEMA IA remains the best data source for identifying individual and household disaster unmet needs for housing recovery. The following section provides an overview of the County’s housing impacts as a result of Hurricanes Sally and Zeta. In Mobile County (not including City of Mobile residents), a total of 20,466 households registered for FEMA IA assistance, including 7,990 owner-occupied households and 12,499 rental households.<sup>17</sup>

The categories below are determined by HUD’s analysis of FEMA Inspected Rental Units. Each of the FEMA Inspected Rental Units are categorized by HUD into the following five categories:

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage.

<sup>17</sup> <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

- **Minor-High:** \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.
- **Major-Low:** \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.
- **Major-High:** \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

The tables below provide a breakdown of FEMA IA applicants by owner-occupied applicants, tenants, applicants by housing type, owner-occupied real property by HUD damage category, and rental units by HUD damage category. While there were more rental FEMA IA applicants (12,488) than owner-occupied applicants (7,989), the total FEMA verified loss amount for owner-occupied units (\$12,524,727) exceeds the FEMA verified loss amount for rental units (\$11,382,119).

Table 9 – FEMA IA Owner-Occupied Overview

| County                           | # of Applicants | # of Inspections | # Inspected with Damage | # Received Assistance | Total FEMA Verified Loss |
|----------------------------------|-----------------|------------------|-------------------------|-----------------------|--------------------------|
| Mobile (excludes City of Mobile) | 7,989           | 3,526            | 2,192                   | 3,605                 | \$12,524,727             |

Source: FEMA Individual Assistance Valid Registrant Dataset

Table 10 – FEMA IA Tenants Overview

| County                           | # of Applicants | # of Inspections | # Inspected with Damage | # Received Assistance | Total FEMA Verified Loss |
|----------------------------------|-----------------|------------------|-------------------------|-----------------------|--------------------------|
| Mobile (excludes City of Mobile) | 12,448          | 6,106            | 4,239                   | 5,656                 | \$11,382,119             |

Source: FEMA Individual Assistance Valid Registrant Dataset

Error! Reference source not found.1 shows FEMA IA applicants by housing type. The highest number of FEMA IA applicants came from housing/duplex units (14,095), followed by apartment units (3,331), and mobile home units (2,102).

Table 11 – FEMA IA Applicants by Housing Type

| Residence Type | Owner-Occupied | Tenants | % Unknown | Total Applicants | % of Total |
|----------------|----------------|---------|-----------|------------------|------------|
| Apartment      | 1              | 3329    | 1         | 3,331            | 16.28%     |

| Residence Type           | Owner-Occupied | Tenants       | % Unknown | Total Applicants | % of Total  |
|--------------------------|----------------|---------------|-----------|------------------|-------------|
| Assisted Living Facility | 0              | 8             | 0         | 8                | 0.04%       |
| Boat                     | 4              | 0             | 1         | 5                | 0.02%       |
| College Dorm             | 0              | 0             | 0         | 0                | 0.00%       |
| Condo                    | 36             | 28            | 1         | 65               | 0.32%       |
| Correctional Facility    | 0              | 0             | 0         | 0                | 0.00%       |
| House/Duplex             | 6160           | 7920          | 15        | 14,095           | 68.87%      |
| Military Housing         | 0              | 2             | 0         | 2                | 0.01%       |
| Mobile Home              | 1404           | 692           | 6         | 2,102            | 10.27%      |
| Other                    | 164            | 238           | 5         | 407              | 1.99%       |
| Townhouse                | 7              | 187           | 0         | 194              | 0.95%       |
| Travel Trailer           | 213            | 44            | 0         | 257              | 1.26%       |
| <b>Total</b>             | <b>7,989</b>   | <b>12,448</b> | <b>29</b> | <b>20,466</b>    | <b>100%</b> |

Source: FEMA Individual Assistance Valid Registrant Dataset

*Error! Reference source not found.* **2** below outlines the number of owner-occupied FEMA applicants with real property damage categorized by levels of damage as defined by HUD in the February 3, 2022, Federal Register Notice. The following are need categories established by HUD for owner-occupied applicants with real property damage:

- **Minor-Low:** Less than \$3,000 of FEMA inspected real property damage.
- **Minor-High:** \$3,000 to \$7,999 of FEMA inspected real property damage.
- **Major-Low:** \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

When owner-occupied properties also have a personal property inspection or only have a personal property inspection, the personal property damage amounts such that if the personal property damage places the home into a higher need category over the real property assessment, the personal property amount is used. This method described by HUD was used in classifying FEMA IA applicants in need categories. The personal property need category for owners are as follows:

- **Minor-Low:** Less than \$2,500 of FEMA inspected personal property damage.
- **Minor-High:** \$2,500 to \$3,499 of FEMA inspected personal property damage.



- **Major-Low:** \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

Table 12 – FEMA Real Property Damage Owner-Occupied Units

| County                           | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe |
|----------------------------------|----------------------|-----------------------|----------------------|-----------------------|-------------------|
| Mobile (excludes City of Mobile) | 1123                 | 287                   | 1024                 | 833                   | 340               |

Source: FEMA Individual Assistance Valid Registrant Dataset

Rental units by damaged need category are shown in *Error! Reference source not found.3*. Through FEMA IA, renters are eligible to apply for monthly rental assistance and to replace damaged or destroyed personal property. FEMA does not inspect rental property damage, so the damage estimate of the rental units is based on the HUD-defined personal property amount by damage category. The need categories are as follows:

- **Minor-Low:** Less than \$2,500 of FEMA inspected personal property damage.
- **Minor-High:** \$2,500 to \$3,499 of FEMA inspected personal property damage.
- **Major-Low:** \$3,500 to \$4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- **Major-High:** \$5,000 to \$9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

Table 13 – FEMA Real Property Damage Owner-Occupied Units

| County                           | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe |
|----------------------------------|----------------------|-----------------------|----------------------|-----------------------|-------------------|
| Mobile (excludes City of Mobile) | 2,407                | 1,792                 | 1,623                | 1,128                 | 213               |

Source: FEMA Individual Assistance Valid Registrant Dataset

## Insurance

**Table 15** shows the number of FEMA IA registered households in Mobile County outside of the City limits of Mobile. This information is categorized on the basis of annual income. The high number of FEMA IA registrants without flood insurance suggests that Mobile County is

underinsured for flood and hurricane events, thereby creating significant demand for local, state, and federal financial resources for housing recovery. Households with an income below \$15,000 represent the income category with the greatest percentage of households without flood insurance at 99.03%. As income increases, the likelihood of carrying flood insurance also increases, as is shown in **Table 155**.

*Table 14 – Number of Households without Flood Insurance*

| <b>Income Category</b> | <b>County</b>                    | <b>Total Households</b> | <b>Number without Flood Insurance</b> | <b>Percentage without Flood Insurance</b> |
|------------------------|----------------------------------|-------------------------|---------------------------------------|---|
| No Stated Income       | Mobile (excludes City of Mobile) | 3,324                   | 3,236                                 | 97.35%                                    |
| < \$15,000             | Mobile (excludes City of Mobile) | 6,280                   | 6,219                                 | 99.03%                                    |
| \$15,000-\$30,000      | Mobile (excludes City of Mobile) | 5,622                   | 5,563                                 | 98.95%                                    |
| \$30,001-\$60,000      | Mobile (excludes City of Mobile) | 3,480                   | 3,329                                 | 95.66%                                    |
| \$60,001-\$120,000     | Mobile (excludes City of Mobile) | 1,473                   | 1,347                                 | 91.45%                                    |
| \$120,001-\$175,000    | Mobile (excludes City of Mobile) | 194                     | 153                                   | 78.87%                                    |
| > \$175,000            | Mobile (excludes City of Mobile) | 93                      | 62                                    | 66.67%                                    |
| <b>Total</b>           | Mobile (excludes City of Mobile) | <b>20,466</b>           | <b>19,909</b>                         | <b>97.28%</b>                             |

*Source: FEMA Individual Assistance Valid Registrant Dataset*

*Table 15 – Number of Households without Homeowners Insurance*

| <b>Income Category</b> | <b>County</b>                    | <b>Total Households</b> | <b>Number without Homeowner's Insurance</b> | <b>Percentage without Homeowner's Insurance</b> |
|------------------------|----------------------------------|-------------------------|---|---|
| No Stated Income       | Mobile (excludes City of Mobile) | 1,491                   | 1,236                                       | 82.90%  |
| < \$15,000             | Mobile (excludes City of Mobile) | 1,898                   | 1,709                                       | 90.04%  |
| \$15,000-\$30,000      | Mobile (excludes City of Mobile) | 2,040                   | 1,668                                       | 81.76%  |

| Income Category     | County                           | Total Households | Number without Homeowner's Insurance | Percentage without Homeowner's Insurance |
|---------------------|----------------------------------|------------------|--------------------------------------|--|
| \$30,001-\$60,000   | Mobile (excludes City of Mobile) | 1,683            | 891                                  | 52.94%                                   |
| \$60,001-\$120,000  | Mobile (excludes City of Mobile) | 742              | 194                                  | 26.15%                                   |
| \$120,001-\$175,000 | Mobile (excludes City of Mobile) | 105              | 16                                   | 15.24%                                   |
| > \$175,000         | Mobile (excludes City of Mobile) | 30               | 8                                    | 26.67%                                   |
| <b>Total</b>        | Mobile (excludes City of Mobile) | <b>7,989</b>     | <b>5,722</b>                         | <b>71.62%</b>                            |

Source: FEMA Individual Assistance Valid Registrant Dataset

## SBA Loans

Small Business Administration (SBA) loans are the basic form of federal disaster assistance for homeowners with good credit and income, and whose private property sustained damage that is not fully covered by FEMA or insurance. Homeowners whose property was damaged by a presidentially declared disaster are eligible to apply for an SBA low-interest loan. Interest rates on these loans are negotiated between the borrower and the lender but are subject to SBA interest rate maximums<sup>18</sup>. As of the most recent SBA data update, 2,694 SBA home loan applications were received from property owners in Mobile County (excluding applicants in the City limits of Mobile) were approved and 416 have been approved. The average disbursement amount for the SBA loans is \$21,816 based on applicants that received a disbursement.

Table 16 – Total Number of Home Loans Approved by SBA

| County                                  | # of Approved Loan Applications | Average Disbursement Amount |
|---|---------------------------------|-----------------------------|
| Mobile County (excludes City of Mobile) | 416                             | \$21,816                    |

Source: SBA data export

## OWNER AND RENTAL HOUSING UNMET NEED CALCULATION

FEMA IA and SBA were the primary data sources that Mobile County used to determine housing unmet need. In *Error! Reference source not found.17*, Mobile County started by organizing FEMA IA applicants by the HUD damage need categories (“Minor-Low”, “Minor-High”, “Major-Low”, “Major-High”, and “Severe”). The FEMA IA value of real property loss was used to estimate loss

<sup>18</sup> <https://www.sba.gov/>

for “Minor-Low” and “Minor-High”. These FEMA IA damage estimates provide the best available information for non-substantially damaged properties.

The FEMA-assessed assistance for repairs typically ranges from \$15,000 to \$28,800 for damage classified as “Major-High” and “Severe.” Those amounts are inadequate to cover the full cost of repairing homes in those categories that received significant damage, in most cases over one foot of water inundation on the first floor. SBA repair estimates provide an actual cost of repair for its applicants. To get a more accurate estimate of housing losses in Mobile County, SBA damage estimates were used to determine the average value of repair for “Major-Low” (all home types), “Major-High” (houses and MHUs), and “Severe” (houses and MHUs) damage.

For all other categories, FEMA IA data was used to calculate the average repair per unit. This is due to FEMA IA damage estimates being accurate for non-substantially damaged properties classified as “Minor-Low” and “Minor-High” damage, as well as damage for condo/apartment units that SBA didn’t classify in their database as a unit type.

Next, the total value of NFIP claims in Mobile County was added to the estimated total loss of FEMA IA applicants to get a total housing loss of \$76.4 million. To obtain the true cost of housing replacement, given increased cost of code compliance and measures to make buildings more resilient to future disasters, an additional 15 percent was added to the total housing loss for a total housing loss of \$99.4 million.

*Table 17 – Summary of Housing Losses*

| <b>Data</b>   | <b>Households / Units</b> | <b>Average Real Property Loss</b> | <b>Source of Average Real Property Loss</b> | <b>Estimated Total Loss</b> |
|---|---------------------------|-----------------------------------|---|-----------------------------|
| Minor-Low Damage to FEMA IA Applicants (All Home Types)     | 3,530                     | \$1,367.97                        | FEMA IA Value of Real Property Damage       | \$4,828,949                 |
| Minor-High Damage to FEMA IA Applicants (All Home Types)    | 2,079                     | \$3,158.78                        | FEMA IA Value of Real Property Damage       | \$6,567,101                 |
| Major-Low Damage to FEMA IA Applicants (All Home Types)     | 2,647                     | \$12,238.89                       | SBA   | \$32,396,342                |
| Major-High Damage to FEMA IA Applicants (Houses)            | 656                       | \$21,511.35                       | SBA   | \$14,111,446                |
| Major-High Damage to FEMA IA Applicants (Condos/Apartments) | 3                         | \$6,557.19                        | FEMA IA Value of Real Property Damage       | \$19,672                    |

| <b>Data</b>   | <b>Households / Units</b> | <b>Average Real Property Loss</b> | <b>Source of Average Real Property Loss</b> | <b>Estimated Total Loss</b> |
|---|---------------------------|-----------------------------------|---|-----------------------------|
| Major-High Damage to FEMA IA Applicants (MHUs)  | 166                       | \$19,707.55                       | SBA   | \$3,271,453                 |
| Major-High Damage to FEMA IA Applicants (All Other Types)                               | 3                         | \$5,732.68                        | FEMA IA Value of Real Property Damage       | \$17,198                    |
| Severe Damage to FEMA IA Applicants (Houses)  | 254                       | \$46,791.70                       | SBA   | \$11,885,092                |
| Severe Damage to FEMA IA Applicants (Condos/Apartments)                                 | 4                         | \$12,803.92                       | FEMA IA Value of Real Property Damage       | \$51,216                    |
| Severe Damage to FEMA IA Applicants (MHUs)  | 77                        | \$44,499.30                       | SBA   | \$3,426,446                 |
| Severe Damage to FEMA IA Applicants (All Other Types)                                   | 5                         | \$21,855.67                       | FEMA IA Value of Real Property Damage       | \$109,278                   |
| FEMA IA Applicant Damage Subtotal   | <b>9,424</b>              |                                   |   | <b>\$76,684,192</b>         |
| <b>NFIP Identified Damages/Payments<sup>19</sup></b>                                    |                           |                                   |   | <b>\$245,237</b>            |
| <b>Total Housing Loss</b>   |                           |                                   |   | <b>\$76,438,955</b>         |
| <b>Total Housing Loss (including 15% resilience for rebuilding to higher standards)</b> |                           |                                   |   | <b>\$87,904,798</b>         |

To ensure that housing repair assistance is factored into the housing unmet needs calculation, FEMA IA payments to repair homes, NFIP payments, and SBA approved loans (non-cancelled) were added together to get the total house assistance received (see **Table 188** for the calculation).

<sup>19</sup> Note: For this assessment, NFIP payments were not available at the individual level. The total was calculated using an estimate based on the number of FEMA IA applicants with flood insurance and the average NFIP payment to Mobile County NFIP policy holders.

Table 18 – Summary of Housing Assistance

| Data                               | Households / Units | Average Real Property Loss | Source of Average Real Property Loss |
|------------------------------------|--------------------|----------------------------|--------------------------------------|
| FEMA IA Payments to Repair Homes   | 3605               | \$2,874                    | \$10,361,239                         |
| SBA                                | 416                | \$21,816                   | \$9,075,456                          |
| NFIP Identified Damages / Payments | 24                 | \$10,218                   | \$245,237                            |
| <b>Total Housing Assistance</b>    |                    |                            | <b>\$19,681,931</b>                  |

To calculate the Total Housing Unmet Need for Mobile County as a result of Hurricanes Sally and Zeta, Total Housing Assistance (\$19.7 million) was subtracted from Total Housing Losses (\$87.9 million) to get \$68.2 million. The Total Housing Unmet Need of Mobile County reflects the amount of housing funds needed to fully recover financially from the Hurricanes Sally and Zeta events in Mobile County.

The data used in this analysis was the best available data at the time of completion.

Table 19 – Total Housing Unmet Need

| Data                            | Households / Units  |
|---------------------------------|---------------------|
| Total Housing Losses            | \$87,904,798        |
| Total Housing Assistance        | \$19,681,931        |
| <b>Total Housing Unmet Need</b> | <b>\$68,222,867</b> |

## Public Housing

The County requested input from the Public Housing Authorities (PHAs) and agencies dedicated to serving vulnerable populations while developing this Unmet Needs Assessment. As defined by HUD, PHAs include any state, county, municipality, or other governmental entity or public body or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the U.S. Housing Act of 1937. For the purposes of this unmet needs assessment, the County requested the number of units that sustained damage, the type of damage from Hurricanes Sally and Zeta and the current status of the damaged units.

There are three housing authorities in Mobile County<sup>20</sup>: the Mobile County Housing Authority, Housing Authority of the City of Chickasaw and Housing Authority of the City of Prichard. All housing authorities reported the number of units that received damage and provided cost

<sup>20</sup> [https://www.hud.gov/sites/dfiles/PIH/documents/PHA Contact Report AL.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/PHA>Contact%20Report%20AL.pdf)

estimates to support the remaining unmet need found in **Table 20**. According to the documentation provided, the current PHA unmet need is \$3,249,668.

*Table 20 – Public Housing Authorities Damaged*

| <b>Data</b>                                | <b># of Units or Single-Family Homes Damaged</b> | <b>Remaining Unmet Need</b> |
|--|--|-----------------------------|
| Housing Authority City of Prichard         | 241  | \$505,500                   |
| Mobile County Housing Authority            | 35   | \$244,168                   |
| Housing Authority of the City of Chickasaw | 288  | \$2,500,000                 |
| <b>Total</b>                               | <b>564</b>                                       | <b>\$3,249,668</b>          |

*Source: Information provided by each PHA*

In addition to the impacts of damage to multi-family HUD-assisted housing and PHAs, there are currently waitlists for public housing units, housing choice vouchers, and project-based vouchers within the County demonstrating a significant need for additional affordable housing units. By making the improvements and repairs to the housing authorities, the PHAs will be able to assist families more rapidly when a unit becomes available, which will reduce the number of individuals on the current waiting lists. While implementing the improvements, all PHAs will ensure that the Energy Star<sup>21</sup> standards are met, and improvements constructed will improve the resiliency of the units.

## Demographics and Impacted Populations

**Error! Reference source not found.**<sup>21</sup> represents the demographic profile of Mobile County, Alabama. The American Community Survey (ACS) data includes estimates of population by race for Mobile County.

*Table 21 – Mobile County Population*

| <b>Area</b>                                     | <b>2017 Population</b> | <b>2020 Population</b> | <b>2022 Population</b> |
|---|------------------------|------------------------|------------------------|
| Mobile County<br>(Not including City of Mobile) | 193,025                | 196,772                | 195,034                |

*Source: 2017, 2020, 2022 U.S. Census ACS 5-year estimates*

The Mobile County Commission uses the Centers for Disease Control and Prevention and Agency for Toxic Substances and Disease Registry (CDC/ATSDR) Social Vulnerability Index (SVI) to identify and quantify areas experiencing social vulnerability, especially in the event of a major disaster within Mobile County. The index is a comparative metric facilitating examination of differences in social vulnerability compared to the rest of the United States at the census tracts level. The data graphically illustrates the variation in social vulnerability across areas impacted by

<sup>21</sup> [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/phecc/federal](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/phecc/federal)

Hurricanes Sally and Zeta. Utilizing this data is helpful in determining the areas that are struggling to recover from the disasters.

Social Vulnerability data refers to the demographic and socioeconomic factors such as poverty, education level, lack of access to transportation and housing patterns, that negatively affect the community. These factors speak to the encounters that add stress to the community, the stressors may include natural or man-made disasters such as hurricanes or chemical spills. Additionally, these stressors may include disease outbreaks such as a global pandemic.



## Analysis of Social Vulnerability Index (SVI)

### **SOCIOECONOMIC STATUS**

This index looks at the population per census tract below 150% poverty, unemployment, housing cost burn, individuals with no high school diploma, and no health insurance.

Areas of Mobile County with the highest Socioeconomic Status vulnerability are:

- Areas north of the City limits of Mobile, including Prichard, Chickasaw and Saraland.
- Areas southwest of the City limits of Mobile, including Theodore.
- Southern part of the County, including Bayou La Batre and Heron Bay.

The southwestern part of the County, including Grand Bay, and the western suburbs of Mobile have the lowest Socioeconomic Status vulnerability.

### **HOUSEHOLD CHARACTERISTICS**

Describes the makeup of households, including those with individuals aged over 65, under the age of 17, disabled individuals, single-parent households, and low level of English language proficiency.

The areas of the County with the highest Household Characteristics vulnerability are around the City of Mobile. The west-central and southwest portions of the County have the lowest Household Characteristics vulnerability.

### **RACIAL AND ETHNIC MINORITY STATUS**

The index looks at the percentile of minorities in an area compared to the rest of the United States. This includes individuals who are Hispanic or Latino, Black or African American, American Indian or Alaska Native, Native Hawaiian or Pacific Islander, two or more races, or other races.

The areas with the highest Racial and Ethnic Minority Status vulnerability are in the Prichard and Saraland area to the north of the City of Mobile. More rural areas of the County, not adjacent to the City of Mobile, had the lowest levels of Racial and Ethnic Minority Status vulnerability.

### **HOUSING TYPE & TRANSPORTATION**

Includes multi-unit structures, mobile homes, units with crowding, households with no vehicle, and those living in group quarters. The southern portion of the County had the highest Housing Type & Transportation vulnerability index, while more suburban areas had the lowest Housing Type & Transportation vulnerability index.

### **OVERALL SVI**

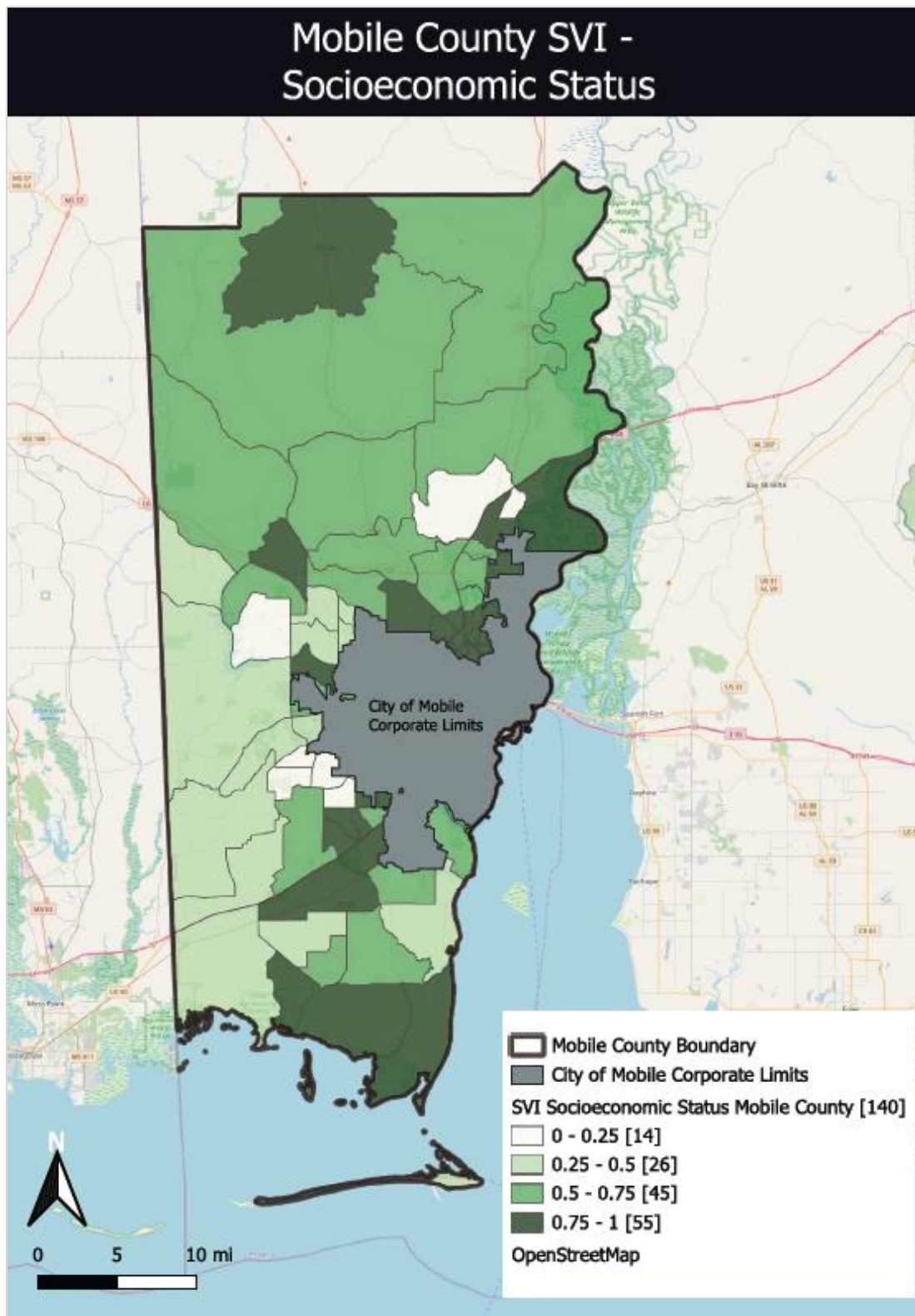
The Overall SVI takes into account all four of the vulnerability categories and creates an overall SVI score for each census tract. Possible scores range from 0 (lowest vulnerability) to 1 (highest vulnerability). The Centers for Disease Control and Agency for Toxic Substances and Disease Registry (CDC/ATSDR) categorize the scores into four vulnerability levels:

- Low (Overall SVI of 0 to .25)
- Low-Medium (Overall SVI of .25 to .50)
- Medium-High (Overall SVI of .50 to .75)
- High (Overall SVI of .75 to 1)

Areas with the Medium-High and High Overall SVI include the northern portion of the County (including Citronelle and Mt. Vernon), areas northeast of the City of Mobile (including Saraland, Chickasaw, and Prichard), the U.S. Route 98 corridor northwest of the City of Mobile, and south of the City near Theodore and Bayou La Batre. Areas with the Low and Low-Medium Overall SVI scores are in the west-central portion of Mobile County (including Millers Creek, Tanner Williams, and around Big Creek Lake).

Areas in Mobile County with High and Medium-High Overall SVI in Mobile County reflects the need for assisting the population with a more resilient and affordable housing stock following the Hurricane Sally and Hurricane Zeta events.

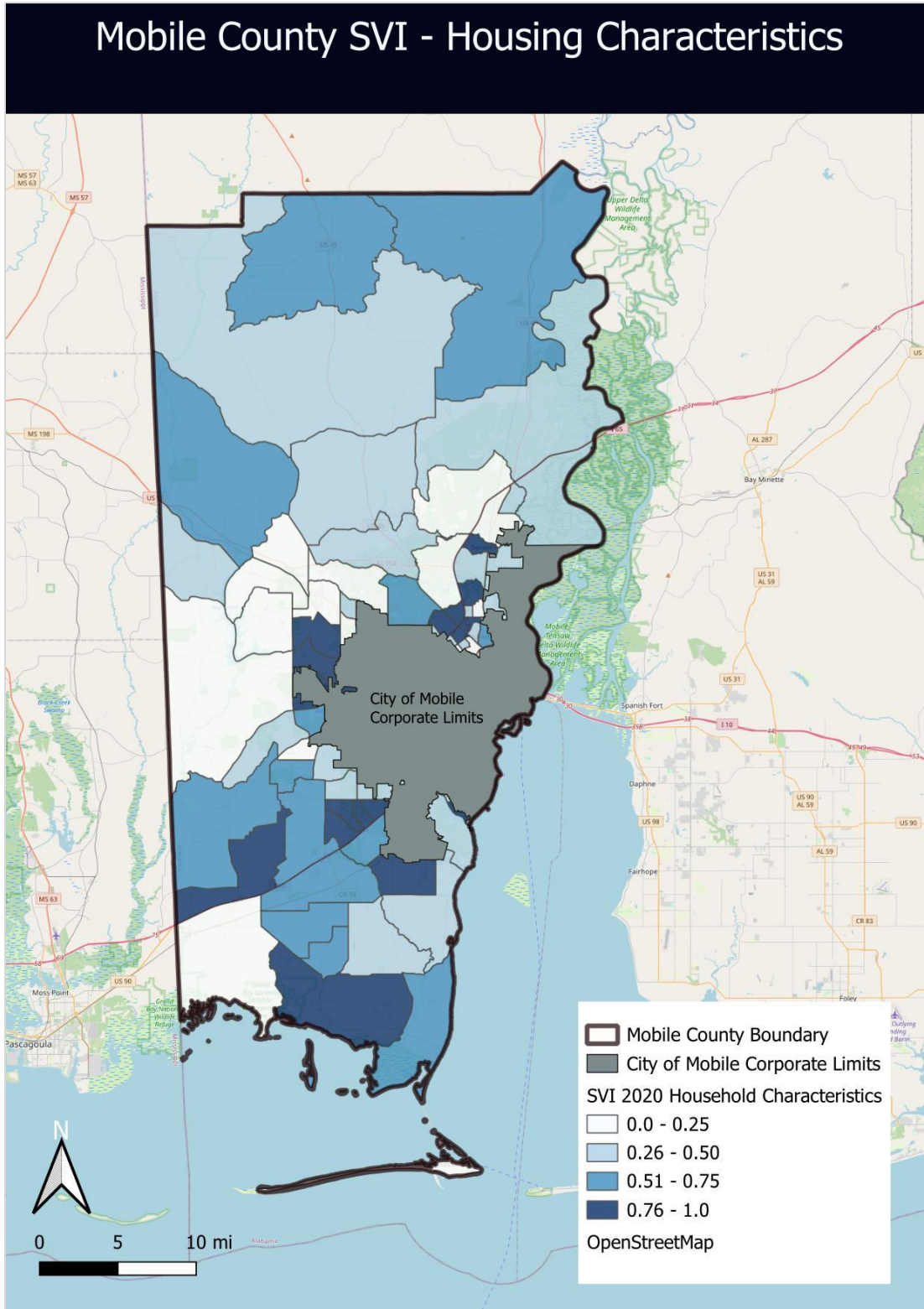
Figure 3 – Mobile County SVI - Socioeconomic Status



Source: CDC/ASDR SVI 2020 Documentation<sup>22</sup>

<sup>22</sup> [https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI\\_documentation\\_2020.html](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html)

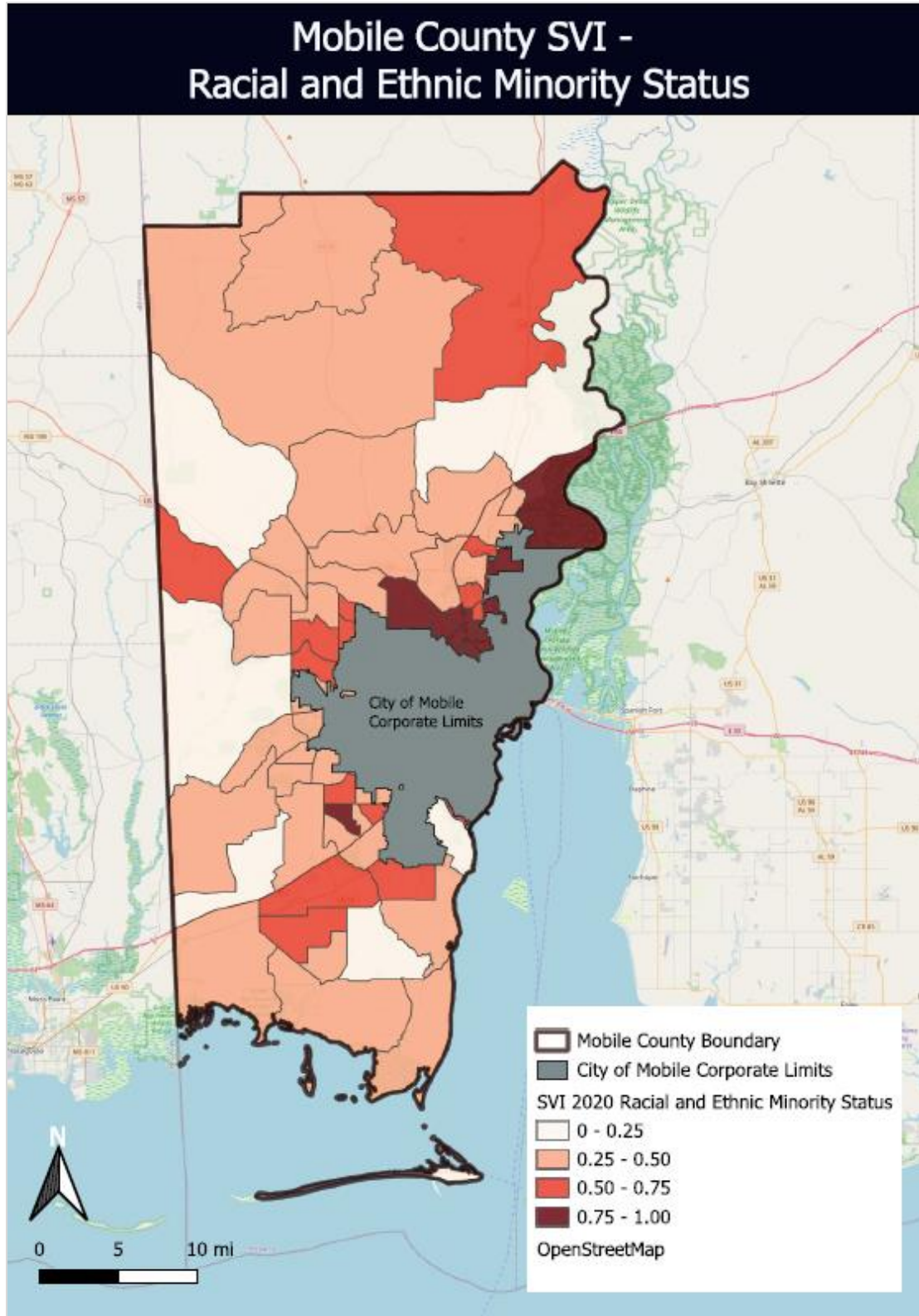
Figure 4 – Mobile County SVI - Housing Characteristics



Source: CDC/ASDR SVI 2020 Documentation<sup>23</sup>

<sup>23</sup> [https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI\\_documentation\\_2020.html](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html)

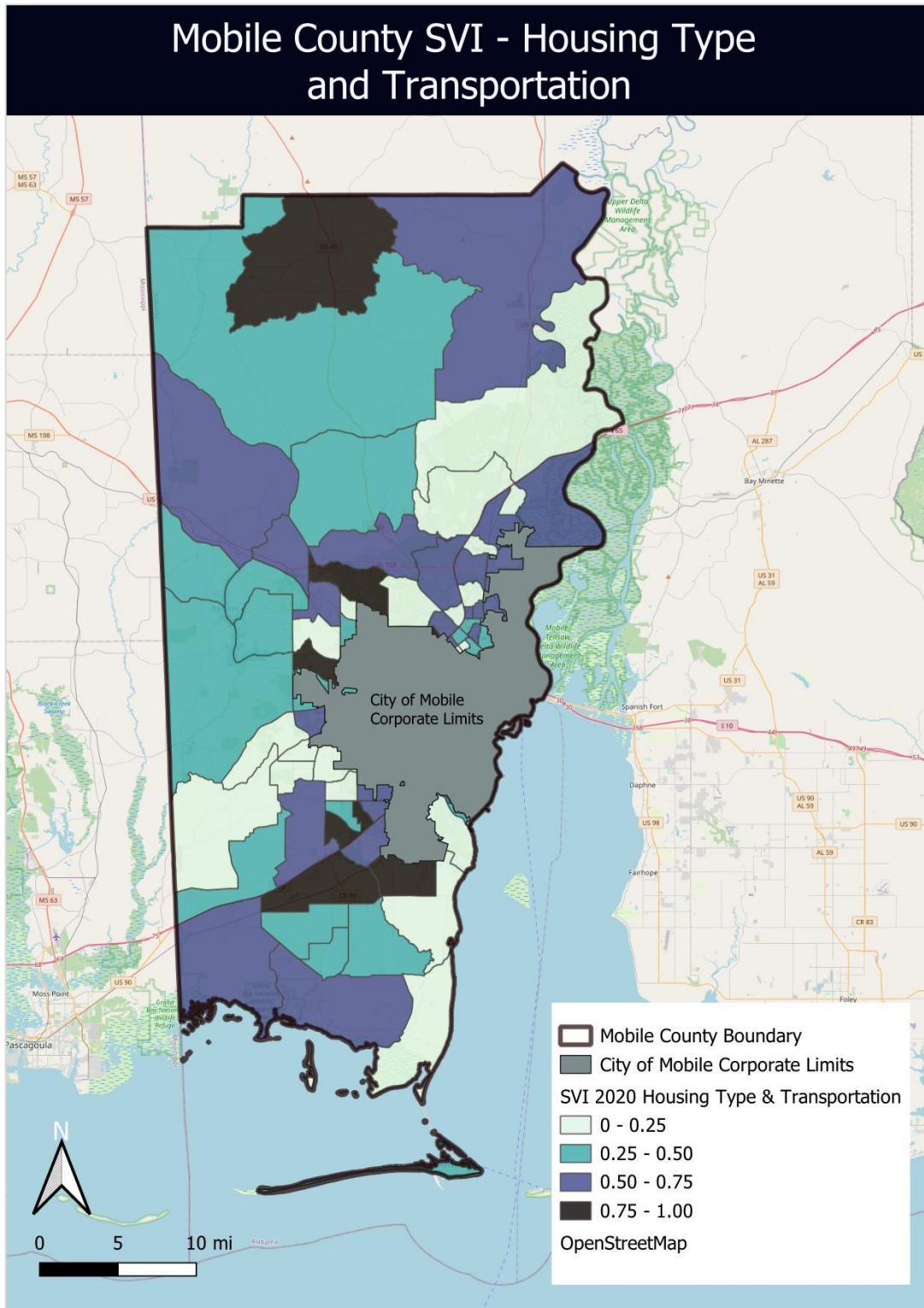
Figure 5 – Mobile County SVI - Racial and Ethnic Minority Status



Source: CDC/ASDR SVI 2020 Documentation<sup>24</sup>

<sup>24</sup> [https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI\\_documentation\\_2020.html](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html)

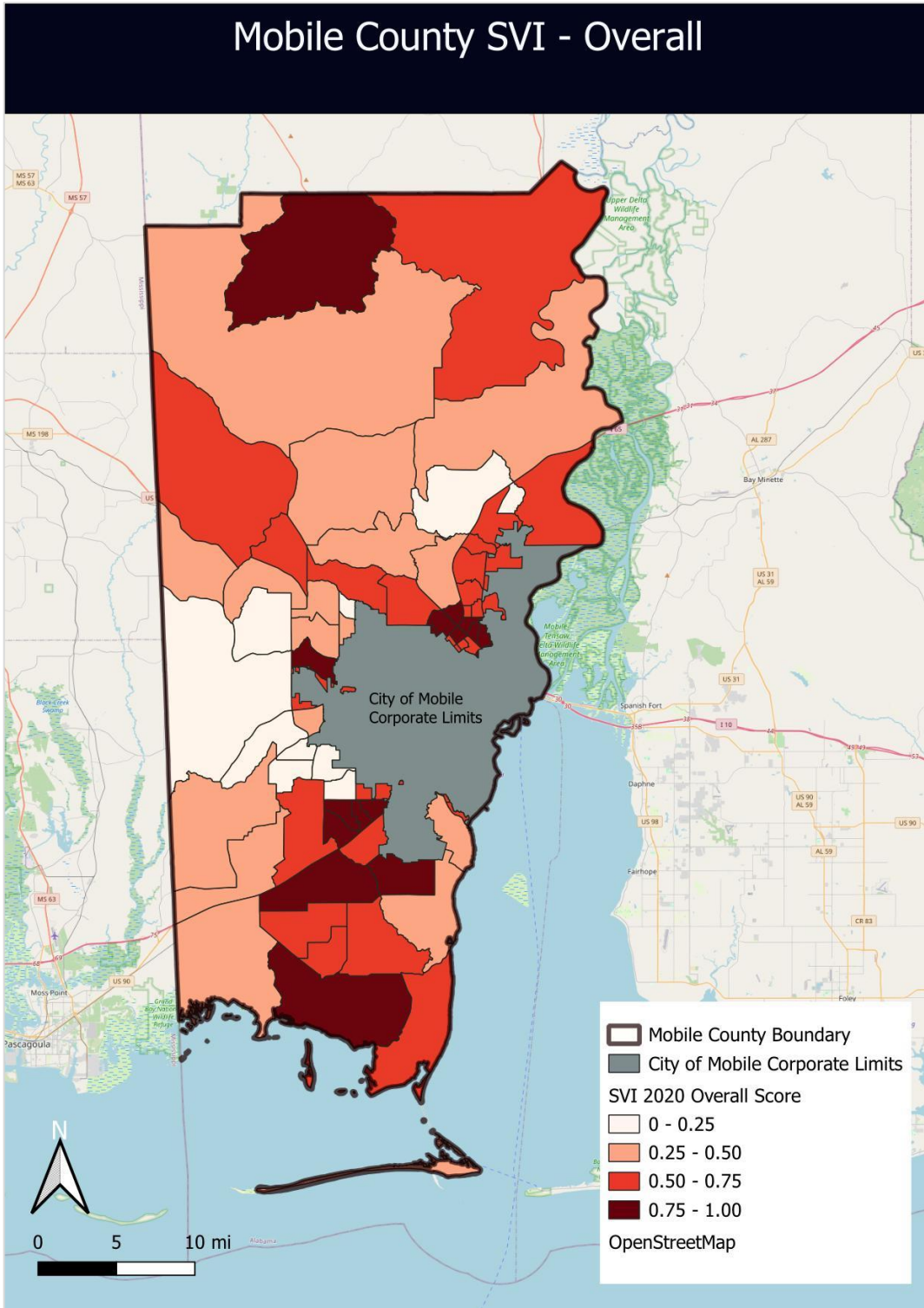
Figure 6 – Mobile County SVI - Housing Type and Transportation



Source: CDC/ASDR SVI 2020 Documentation<sup>25</sup>

<sup>25</sup> [https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI\\_documentation\\_2020.html](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html)

Figure 7 – Mobile County Overall SVI



Source: CDC/ASDR SVI 2020 Documentation<sup>26</sup>

<sup>26</sup> [https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI\\_documentation\\_2020.html](https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html)

## Summary of Housing Impacts and Needs

Hurricanes Sally and Zeta caused a significant amount of damage to residential properties throughout the community. Many homes were flooded, roofs were damaged or ripped off, and some were demolished. This resulted in many residents being displaced from their homes. Creating the burden and stress of seeking temporary housing in emergency shelters, hotels, or with family and friends. Due to the housing destruction, the municipalities within Mobile County saw a significant increase in demand for affordable housing. While the affordable housing demand grew, the housing options decreased leaving the available supply very thin. This not only impacted homeowners but also those in rental situations. The limited supply led to a spike in rental rates, making it very difficult for those LMI individuals to seek cleaner and safer housing.

The greatest unmet need found through the community is the repair and replacement of individual single-family homes. While ADECA is actively administering HRAP, the need far outweighs the applications in process. During the Public Engagement meetings hosted by Mobile County, the residents continuously voiced their burden and concerns related to their homes being in need of repairs. Specifically, during the City of Prichard Public Engagement meeting over 500 community residents attended to express their need for assistance. *Error! Reference source not found.2* is a representation of the applications in process with ADECA from Mobile County. In an effort to sustain long-term recovery from Hurricanes Sally and Zeta, Mobile County will need to develop a course of action to assist those who have not been approved for HRAP. Mobile County has expressed the community's concern about needing additional assistance from the program and the need to open the program for additional applications.

Table 22 – HRAP Application in Process for Mobile County

| Applications by Municipality | Zip Code(s)       | Number of Applicants |
|------------------------------|-------------------|----------------------|
| Axis                         | 36505             | 2                    |
| Bayou La Batre               | 36509             | 1                    |
| Chickasaw                    | 36611             | 15                   |
| Chunchula                    | 36521             | 1                    |
| Citronelle                   | 36522             | 5                    |
| Coden                        | 36523             | 1                    |
| Creola                       | 36525             | 1                    |
| Dauphin Island               | 36528             | 2                    |
| Grand Bay                    | 36541             | 21                   |
| Irvington                    | 36544             | 15                   |
| Mount Vernon                 | 36560             | 11                   |
| Prichard                     | 36610,36612,36613 | 172                  |



| <b>Applications by Municipality</b> | <b>Zip Code(s)</b> | <b>Number of Applicants</b> |
|-------------------------------------|--------------------|-----------------------------|
| Saraland                            | 36571              | 8                           |
| Satsuma                             | 36572              | 1                           |
| Semmes                              | 36575              | 3                           |
| Theodore                            | 36582              | 18                          |
| <b>Total Number of Applications</b> |                    | <b>277</b>                  |

Source: ADECA

To summarize, Mobile County has experienced an increased demand for affordable housing due to the displacement of residents because of damage to existing homes and homes under construction. Meeting the affordable housing needs of the community is critical to ensure the most vulnerable population has safe and stable living conditions. Suggested projects and strategies include:

**DEVELOPMENT OF NEW AFFORDABLE OWNER-OCCUPIED HOUSING:**

Investing the allocated housing funding in the development of new housing units will help meet the long-term housing needs of Mobile County. The Mobile County Commission will encourage collaboration with nonprofit organizations, developers, and housing agencies to build affordable housing units that will target the LMI community and other targeted populations.

**DEVELOPMENT OF NEW AFFORDABLE RENTAL HOUSING:**

This program will develop new affordable rental housing units for the LMI and other targeted populations in the community. The Mobile County Commission will collaborate with nonprofit organizations, developers, and housing agencies to build affordable rental housing units that maintain affordable subsidized rental rates.

**VOLUNTARY RESIDENTIAL HOME BUYOUTS:**

Allocated housing funding will be utilized to acquire properties that are in Special Flood Hazard Areas (SFHA), and in high-risk flood areas to help reduce the impact of future disasters, and to assist property owners with relocating outside of zones that are a flooding threat.

**HOMEOWNERSHIP DOWNPAYMENT ASSISTANCE:**

The Downpayment Assistance Program will provide an opportunity for households to purchase affordable housing by providing up to 100% of the downpayment required by the mortgage lender and subsidize mortgage interest rates to make housing payments more affordable. Households with income up to 120% Area Median Income (AMI) may qualify based on need. An eight-hour homeownership education course provided by a HUD Certified Housing Counseling Agency is required by applicants.

## Infrastructure and Public Facilities Improvements Unmet Need

As a result of both Hurricane Sally and Zeta, there was significant impact on County critical infrastructure. Per the subrecipient agreement with ADECA, \$15,244,376 of the total awarded allocation must be spent on non-housing activities, and this section reflects the County’s non-Federal cost share and non-match projects unmet need. **Table 23** represents the estimated total unmet need broken out by each Infrastructure program: FEMA Public Assistance (PA), FEMA Hazard Mitigation Grant Program (HMGP) and non-match (standalone). Through the unmet needs process and stakeholder engagement, the County continued to document the severe damage to public facilities and infrastructure.

*Table 23 – Summary of Infrastructure Unmet Need by Program*

| Infrastructure Program Type and Estimated Costs  |                        |
|--|------------------------|
| Infrastructure Program Type                      | Estimated Total Cost   |
| FEMA PA (PA Match)                               | \$423,567.57           |
| FEMA HMGP (HMGP Match)                           | \$1,240,800.25         |
| Non-Match (Standalone)                           | \$93,994,668           |
| <b>Total Infrastructure Estimated Unmet Need</b> | <b>\$95,659,035.80</b> |

### Infrastructure and Public Facilities Analysis and Methods

Both Hurricanes impacted infrastructure in the County, and this section discusses lingering unmet needs. Specific references are made to infrastructure damage and challenges to recovery, with an emphasis on FEMA’s PA non-Federal cost share, FEMA’s HMGP non-Federal cost share, and non-match projects not covered by other grant sources. For Hurricanes Sally and Zeta, cost share percentages are as follows:

- FEMA PA Non-Federal Cost Share: The Federal share of assistance is 90 percent of the eligible project cost, requiring the local government to contribute the remaining 10 percent in cost share.
- FEMA HMGP Non-Federal Cost Share: The Federal share of assistance is 75 percent of the eligible project cost, requiring the local government to contribute the remaining 25 percent in cost share.

The County has also identified significant unmet needs for non-match projects. The County intends to implement a range of eligible CDBG-DR projects, such as shoreline stabilization and critical facilities improvements. These non-match projects were identified by municipal and community stakeholder public engagement and one-on-one meetings, which engaged local partners in identifying unmet needs throughout the County.

## FEMA PA Need

As the County has met with critical stakeholders, the need for FEMA PA non-Federal cost share due to the impacts of both storms has been further brought to the forefront. **Table 244** breaks down the FEMA PA sites and costs distributed by PA Category within the County. For FEMA PA projects under Hurricanes Sally and Zeta, the federal cost share is 90% of the total project cost, which leaves 10% for the non-federal, local cost share. As per the data, the unmet need for the non-federal cost share, Categories A through G is estimated at \$297,993.17.

Table 24 – The Estimated Cost per FEMA PA Category A-G

| PA Category                        | Estimated Number of Damaged Sites (#) | Estimated Total Cost (\$) | Estimated Federal Cost Share (90%) | Estimated Non-Federal Cost Share (10%) |
|------------------------------------|---------------------------------------|---------------------------|------------------------------------|--|
| A – Debris*                        | N/A                                   | N/A                       | N/A                                | N/A                                    |
| B – Emergency Measures*            | N/A                                   | N/A                       | N/A                                | N/A                                    |
| C – Roads and Bridges              | 6                                     | \$526,379.30              | \$473,741.38                       | \$52,637.92                            |
| D – Water Control Facilities       | 0                                     | \$0                       | \$0                                | \$0                                    |
| E – Public Buildings and Equipment | 35                                    | \$1,713,554.33            | \$1,542,198.92                     | \$171,355.41                           |
| F – Utilities                      | 6                                     | \$494,786.57              | \$445,307.92                       | \$49,478.65                            |
| G – Other                          | 10                                    | \$245,212.04              | \$220,690.85                       | \$24,521.19                            |
| <b>Total</b>                       | <b>57</b>                             | <b>\$2,979,932.24</b>     | <b>\$2,681,939.07</b>              | <b>\$297,993.17</b>                    |

\*CDBG-DR funds are not used for damage identified in categories A and B as they are 100% reimbursed by FEMA.

Source: [Open FEMA Dataset: Public Assistance Funded Projects Details](#)

Labor and materials have seen consistent cost increases in recent years. ADECA’s Action Plan identifies a 23.6 percent increase for building materials and supply costs in the County, which is anticipated for these projects.<sup>27</sup>

As noted in **Table 25**, the total FEMA PA project amount was increased by 15 percent for resilience measures, and an additional 23.5 percent for increased costs related to costs of construction and resilience portions of the projects. The total local cost share, which excludes FEMA PA Categories A and B as noted above, is estimated at \$423,567.57.

<sup>27</sup> Alabama DRGR Public Action Plan – Approved 1.12.23, page 48, <https://adeca.alabama.gov/wp-content/uploads/Alabama-DRGR-Public-Action-Plan-Approved-1.12.23.pdf>

Table 25 – Total PA Project Amount Plus Resiliency and Building/Materials Increase

| Category                     | Total PA Project Amount | Total PA Project Cost (+15% Resiliency) | Total PA Project (+23.6% Increased Costs of Construction & Resiliency) <sup>28</sup> | Local Share After Resiliency and Increased Cost of Construction (10%) |
|------------------------------|-------------------------|---|--|---|
| C – Roads and Bridges        | \$526,379.30            | \$605,336.20                            | \$748,195.54   | \$74,819.55   |
| D – Water Control Facilities | \$0                     | \$0                                     | \$0  | \$0   |
| E – Public Buildings         | \$1,713,554.33          | \$1,970,587.48                          | \$2,435,646.12   | \$243,564.61  |
| F – Public Utilities         | \$494,786.57            | \$569,004.56                            | \$703,289.63   | \$70,328.96   |
| G – Recreational or Other    | \$245,212.04            | \$281,993.85                            | \$348,544.39   | \$34,854.44   |
| <b>Total</b>                 | <b>\$2,979,932.24</b>   | <b>\$3,426,922.08</b>                   | <b>\$4,235,675.69</b>  | <b>\$423,567.57</b>   |

## FEMA HMGP Need

In addition to the PA unmet need noted above, the County has identified a significant burden on local governments for the HMGP non-Federal cost share. The Federal share of assistance is 75 percent of the eligible project cost, requiring the local government to contribute the remaining 25 percent in cost share. While some HMGP projects may be deemed ineligible for CDBG-DR Match assistance, the County will work to identify those projects under Mitigation funding for implementation. **Table 266** outlines the four projects with a non-Federal cost share unmet need estimated at \$1,240,800.25.

Table 26 – Total Estimated HMGP Non-Federal Cost Share Unmet Need

| County        | Estimated Number of HMGP Projects (#) | Estimated Total Cost (\$) | Estimated Federal Cost Share (75%) | Estimated Non-Federal Cost Share (25%) |
|---------------|---------------------------------------|---------------------------|------------------------------------|--|
| Mobile County | 4                                     | \$4,963,201.00            | \$3,722,400.75                     | \$1,240,800.25                         |

Source: Mobile County

<sup>28</sup> [Producer Price Index by Industry: Building Material and Supplies Dealers \(PCU44414441\) | FRED | St. Louis Fed \(stlouisfed.org\)](https://fred.stlouisfed.org/series/PCU44414441)

## Non-Match Need

To identify non-Match projects, the County has conducted outreach and met with municipalities, tribes and special districts throughout the County to gather input. The County requested that each jurisdiction submit project-related unmet needs. Based on the review of the projects that were submitted, the County has identified an unmet need of \$93,994,668.

*Table 27 – Non-match Projects and Related Unmet Need*

| County        | Estimated Number of Non-Match Projects | Estimated Unmet Need (\$) |
|---------------|--|---------------------------|
| Mobile County | 21                                     | \$93,994,668              |

*Source: Mobile County and local jurisdictions*

The County has determined that the greatest unmet needs are housing and infrastructure activities, therefore the CDBG-DR funding will address those areas. The County will, however, continue to evaluate any economic unmet need and work with the business community to leverage disaster recovery funding and programs to support any additional identified need.

## Mitigation Only Activities

### Overview

Proactively addressing the impacts of climate change and natural disasters is critical to building long-term community resilience. Mitigation is one of the best ways to support the health and wellbeing of vulnerable community members before disaster strikes. The CDBG-DR Mitigation set-aside requirement enables communities to proactively implement innovative climate adaptation solutions that will make their communities more resilient and equitable. The devastation across the County associated with Hurricanes Sally and Zeta was extensive and impacted diverse communities which created significant barriers to recovery. However, it will allow the County and its partners within recovery to incorporate transformational mitigation and resiliency components to prevent impacts from future events.

Mitigation activities increase resilience to disasters and reduce or eliminate the fiscal and human costs of long-term hazard risks. These risks include loss of life, injury, damage to and loss of property, and suffering and hardship. It is the intention of the County to consider and potentially incorporate mitigation components into programs and projects where appropriate. The components will:

- Meet the definition of mitigation activities;
- Address current and future risks as identified by Mobile County’s Unmet Needs Assessment;
- Meet eligibility requirements for CDBG activities under Title I of the HCDA or be otherwise eligible pursuant to a waiver or alternative requirement; and
- Meet a national objective.

## Mobile County Primary Hazards

In 2021, the County, in conjunction with Alabama Emergency Management Agency Region A, South Alabama Regional Planning Commission Counties, completed a Hazard Mitigation Plan (The Plan). The Plan was a “Regional Multi-Jurisdictional Hazard Mitigation Plan intended to identify and detail the hazards that affect the Alabama Emergency Management Agency’s (AEMA) Division A. This division includes the following counties and the municipalities and jurisdictions within them: Baldwin, Choctaw, Clarke, Conecuh, Escambia, Mobile, Monroe, and Washington.”<sup>29</sup> Participants in the Plan under the County of Mobile are:

- Mobile County
- City of Bayou La Batre
- City of Chickasaw
- City of Citronelle
- City of Creola
- Town of Dauphin Island
- City of Mobile
- Town of Mount Vernon
- City of Prichard
- City of Saraland
- City of Satsuma
- City of Semmes

The County has highlighted the primary hazards impact and probability of future events as noted below:

- Impacts and Probability of future events: Describes the direct impacts on Mobile County and the likelihood of future hazard occurrences in the County. Many hazards may affect the entire County, while other hazards are more localized due to specific factors. These qualitative descriptions are from historical occurrences and other risk factors. Due to the lack of comprehensive quantitative data on many of the hazards, susceptibility to future damage was noted by categories of High, Medium, Low, or Very Low. These categories are described below:
  - High: Probable major damage in a 1-10 Year Period
  - Medium: Probable major damage in a 10-50 Year Period
  - Low: Probable major damage in a 100 Year Period
  - Very Low: No probable major damage in a 100 Year Period

---

<sup>29</sup> [Alabama Region A 2021 Hazard Mitigation Plan, South Alabama Regional Planning Commission Counties Baldwin County, Escambia County, Mobile County](#), pg 2

The purpose of Hazard Mitigation Plan was to evaluate and identify all prioritized hazards which may affect the County. The County has highlighted the primary hazards that are categorized as High:

- Drought/Extreme Heat
- Flooding/Flash Flood
- High Winds (Hurricanes, Tornadoes, Windstorms)

## Drought/Extreme Heat

### IMPACTS AND PROBABILITY:

The Plan defines extreme heat as repeated instances of temperatures over 100 degrees Fahrenheit and associated heat index values over 100 degrees Fahrenheit. These conditions occur frequently in Mobile County and are expected to continue. Due to the regions' climate, high temperatures coupled with high humidity are a common occurrence. The probability of drought and extreme heat occurring within the County is relatively high. As most jurisdictions in the region can manage milder cases of drought and heat waves, the probability of an impactful drought or an extreme heat event occurring in the region is classified as low (probably major damage in a 100-year period).<sup>30</sup>

## Flooding/flash Flood

### IMPACTS AND PROBABILITY:

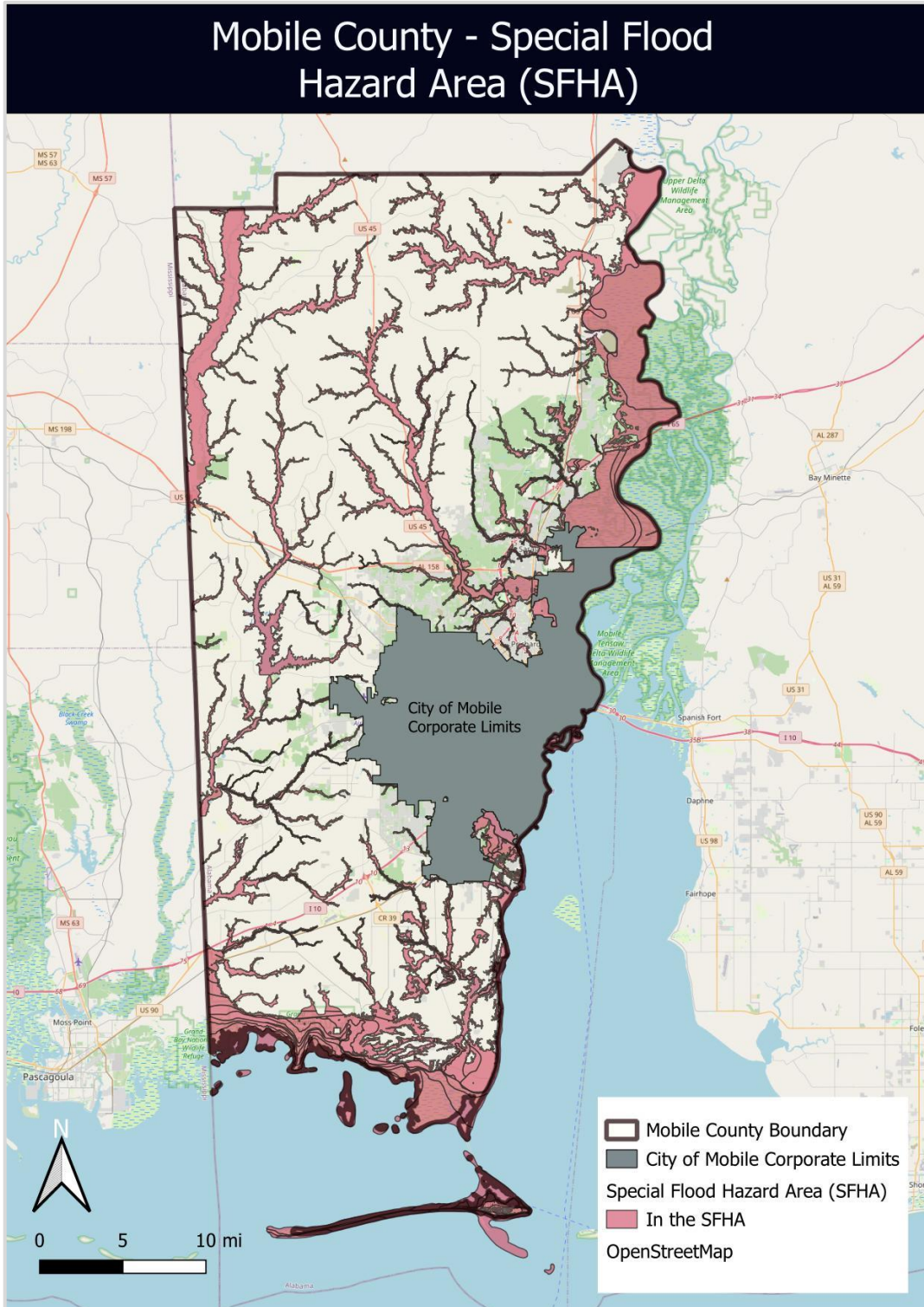
Proximity to the Alabama coast exposes Mobile County to the risk of storm surge, resulting in widespread coastal flooding and property damage, including the most vulnerable populations within the community. Coastal and Riverine Flooding is a significant hazard in Mobile County, especially in low-lying and coastal areas, which results in costly damage to the community and often to the LMI population. Flash flooding events are expected to increase in frequency and intensity. Rainfall levels are projected to increase leading to an increased chance of flash flooding. As development within the County and region increases, the risk for flash flooding will increase as impermeable surfaces increase. Drainage infrastructure will contribute to an increase in flash flooding also. Based on the information provided in this profile, the probability of future flood events is high.<sup>31</sup>

---

<sup>30</sup> [Alabama Region A 2021 Hazard Mitigation Plan, South Alabama Regional Planning Commission Counties Baldwin County, Escambia County, Mobile County](#), pg 26

<sup>31</sup> [ibid](#), pg 36-47

Figure 8 – Mobile County SFHA Map



Source: FEMA Flood Map Service Center<sup>32</sup>

<sup>32</sup> <https://msc.fema.gov/portal/advanceSearch>



## High Winds (Hurricanes, Tornadoes, Windstorms)

### IMPACTS AND PROBABILITY

The probability of future hurricanes, tornadoes, windstorm events directly affecting the County is high. The County is more susceptible to high winds, heavy rainfall, flooding and spin off tornadoes associated with direct hits by tropical systems as well as when a system moves inland. According to the 2018 State of Alabama Hazard Mitigation Plan, “hurricane hazards are generally expected to increase through the twenty-first century. The measures of hurricane activity include intensity, frequency, and duration. Since high-quality satellite data first became available in the early 1980s, scientists have observed a substantial increase in all of these measures of hurricane activity for North Atlantic hurricanes, as well as an increase in the frequency of the strongest (Category 4 and 5) hurricanes. Although simulations of future hurricane activity span a range of possible outcomes, on average the models project an increase in the annual number of Category 4 and 5 hurricanes by the late twenty-first century, as well as a slight decrease in the number of tropical cyclones. Changes in the storm tracks of North Atlantic hurricanes are less well understood. The storm tracks of North Atlantic hurricanes are shaped by both atmospheric dynamics and ocean circulation, and projected changes in ocean circulation remain poorly constrained.”<sup>33</sup>

### Mitigation Project Funding

In the ever-changing disaster recovery field, identifying vulnerabilities is critical to implementing robust solutions. The Mitigation UNA sets the groundwork for effective non-match infrastructure projects by providing informed decision-making on projects that aim to reduce risks that were identified above. The County will prioritize the most pressing needs and vulnerabilities, strategically allocate resources that provide the most benefit, and provide the foresight to enhance the community’s resilience to future disasters.

As noted in the County’s Hazard Mitigation Plan, “jurisdictions in the County have limited to no funding to support mitigation efforts. This lack of funding to mitigation projects influences its’ vulnerability to all hazards.”<sup>34</sup> Funds will be documented for necessary expenses related to long-term recovery, restoration of housing and infrastructure resulting from Hurricane Sally and Zeta and will contribute to mitigation and resiliency of Mobile County, to assist ADECA in meeting the requirements of the 15 percent mitigation set-aside.

## Outreach, Engagement and Stakeholder Consultation

As part of the planning and development of the Local Recovery Plan, Mobile County made an effort to provide citizen participation and gather public comments through multiple public and one-on-one meetings. Citizens were encouraged to participate in all phases of ADECA’s CDBG-DR planning program and provided access to program information for the development of the

---

<sup>33</sup> [Ibid](#), pg 48-97

<sup>34</sup> [Ibid](#), pg 116

Local Recovery Plan. While all citizen comments and related input were considered, the Mobile County Commission assumes final responsibility and authority for the planning, development, implementation, and assessment of the Local Recovery Plan.

The County collaborated with local organizations, municipalities, and tribes throughout the community to conduct outreach efforts to the citizens they serve through five public engagement meetings. All meeting materials and public notices included the time, date, place, and topics of discussion for that specific meeting. The County also established stakeholders and partnerships throughout the community to provide outreach to the targeted population. Partnerships included, but were not limited to:

- Local Municipalities and Tribes;
- Community Organizations;
- Educational Institutions;
- Public Assistance Agencies (such as SNAP, Medicaid, and/or WIC local offices);
- Community Centers; and
- Workforce Development Agencies.

The County utilized several methods to increase public engagement including five public engagement meetings using the open house format, questionnaires, and discussions throughout key components of the planning process. Access to updates and meeting materials were continuously made available on the County's website. All comments received were utilized to develop the unmet needs assessment and ultimately, the Local Recovery Plan. Appendix B: Public Engagement Questionnaires outlines all of the questions asked of attendees following the public engagement meetings to collect additional information to support the Unmet Needs Assessment as well as the Local Recovery Plan.

As noted above, the County scheduled five public engagement meetings to increase and encourage participation from community members impacted by Hurricanes Sally and Zeta. The public engagement meeting locations were in several areas throughout the County to facilitate a broad representation of the affected population and to include vulnerable and hard to reach populations. The meetings were structured to encourage participation from attendees to understand the unmet needs in affordable housing, infrastructure, and economic revitalization. The initial virtual meeting engaged elected officials and non-governmental organizations who serve and represent the citizens of the County. To ensure access to low to moderate-income persons, in-person meetings were scheduled in three critical areas impacted by the storms – Prichard, AL, Bayou La Batre, AL and Citronelle, AL. The final engagement meeting was conducted as a planning charrette to review information shared by the community and the initial draft of the Local Recovery Plan to assist in disaster recovery. The final public engagement meeting allowed for additional input from the community prior to the public hearings. Below is a more detailed description of activities that took place during each public engagement meeting.

## **PUBLIC ENGAGEMENT MEETING ONE**

The targeted audience for Public Engagement Meeting One was municipalities, organizations and other potential Stakeholders. This meeting was held virtually via Zoom allowing officials and members of leadership the opportunity to attend during their regularly scheduled business hours. The agenda for this meeting was to inform attendees on the various aspects of the CDBG-DR grant including a detailed overview of CDBG-DR, program partnerships, funding allocations and availability, eligible activities, and next steps. Mobile County also provided the opportunity for discussion to gather recovery needs from participants and collect feedback. Following this Public Engagement Meeting, the Mobile County Commission sent a follow up email to all participants providing the post-meeting questionnaire link and outlining methods of communication for additional feedback or questions.

## **PUBLIC ENGAGEMENT MEETING TWO**

This meeting was targeted at the general public and hosted in the City of Prichard at 2:00pm CT. The agenda for this meeting was to inform the public on the various aspects of the CDBG-DR grant including a detailed overview of CDBG-DR, program partnerships, funding allocations and availability, eligible activities, and next steps. Mobile County also provided the opportunity for discussion to gather recovery needs from participants and collect feedback. While the primary focus of this meeting was intended to gather more streamlined information regarding potential projects or programs to be administered by Mobile County, it was overshadowed by ADECA's Single-family Home Recovery Alabama Program (HRAP). Approximately 500 individuals attended this Public Engagement meeting in hopes of receiving answers and/or assistance from the State Representative in attendance.

## **PUBLIC ENGAGEMENT MEETING THREE**

Like Public Engagement Meeting Two, this meeting was targeted at the general public, but hosted by the City of Bayou La Batre at 6:00pm CT. By changing the meeting time to after regular business hours, Mobile County hoped to reach the working-class community members who cannot otherwise attend a Public Engagement meeting. The overarching goal of this meeting was to inform individuals on various aspects of this grant including a detailed overview of CDBG-DR, program partnerships, funding availability, eligible activities, and next steps. Mobile County provided opportunities for discussion to further understand recovery needs in the area and how to provide feedback via the online questionnaire. During this meeting the residents provided outstanding feedback during the brainstorm session related to infrastructure and the City's needs.

## **PUBLIC ENGAGEMENT MEETING FOUR**

Following in the same format of Public Engagement Meeting Three, Mobile County partnered with the City of Citronelle to host Public Engagement Meeting Four. In an attempt to target those individuals who cannot attend during the traditional business hours, this meeting took place at 6:00pm CT. When preparing for this engagement, Mobile County shifted their focus from providing an overview of CDBG-DR to focusing on the next steps related to the Unmet Needs

Assessment and the Local Recovery Plan. The County outlined information and data that had been collected to date and how that information would be used to craft the Unmet Needs Assessment and Local Recovery Plan.

**PUBLIC ENGAGEMENT MEETING FIVE**

Mobile County hosted this meeting virtually via Microsoft Teams at 2:00pm CT. The format of this meeting differed from some of the other Public Engagement Meetings as it was conducted as a charrette. To reach as many organizations as possible, not only did the County post the meeting on the CDBG-DR website and local newspaper 14 days in advance but emailed all the Federally recognized Tribes for their participation. The County also contacted many local non-profit agencies requesting their participation at the charrette. During this meeting the County presented data collected and used in the draft Unmet Needs Assessment. The County also presented the proposed projects and programs developed to support Affordable Housing and Infrastructure related activities. The purpose of the charrette format was to identify any final gaps prior to the finalization of the Unmet Needs Assessment and Local Recovery Plan.

Additionally, during these engagements, the County provided informational material to the community to promote clear understanding and program transparency, such as fliers, frequently asked questions (FAQs), questionnaires and formats for public feedback. At minimum, the material provided the following information:

- The amount of CDBG-DR funds expected to be made available for the current fiscal year (including the grant and anticipated program income);
- The range of activities that may be undertaken with the CDBG-DR funds;
- The estimated amount of the CDBG-DR funds proposed to be used for activities that will meet the national objective of benefit to low- and moderate-income persons; and
- The proposed CDBG-DR activities are likely to result in displacement and the unit of general local government's anti-displacement and relocation plans required under § 570.488.

The below summaries each public engagement meeting, the focus, date, location and outreach method.

| Engagement Title                | Meeting Focus                                     | Date              | Location         | Outreach Method  |
|---------------------------------|---|-------------------|------------------|--|
| Public Engagement Meeting – One | CDBG-DR Introduction to Municipalities and Tribes | February 19, 2024 | Virtually – Zoom | Published in the local newspaper and the <a href="#">Mobile County CDBG-DR Website</a> |
| Public Engagement Meeting – Two | CDBG-DR Introduction to the Public                | March 11, 2024    | City of Prichard | Published in the local newspaper and the <a href="#">Mobile County CDBG-DR Website</a> |

| Engagement Title                           | Meeting Focus  | Date           | Location               | Outreach Method  |
|--|--|----------------|------------------------|--|
| Public Engagement Meeting- Three/Charrette | Discuss the UNA and LRP in detail and gather community feedback            | March 28, 2024 | City of Bayou La Batre | Published in the local newspaper and the <a href="#">Mobile County CDBG-DR Website</a> |
| Public Engagement Meeting – Four           | Discuss the final UNA and introduce the LRP                                | April 29, 2024 | City of Citronelle     | Published in the local newspaper and the <a href="#">Mobile County CDBG-DR Website</a> |
| Public Engagement Meeting/Charrette – Five | Discuss the UNA and gather feedback on potential LRP Programs and Projects | August 7, 2024 | Virtually – Zoom       | Published in the local newspaper and the <a href="#">Mobile County CDBG-DR Website</a> |

In addition to the five public engagement meetings, participation was requested from stakeholders that include the following municipalities, agencies, utilities, and tribal nations. Appendix A: Mobile County Outreach Efforts outlines additional details the outreach efforts that were made to each point of contact.

- City of Citronelle
- MOWA Tribe
- Town of Mt. Vernon
- City of Creola
- City of Satsuma
- City of Saraland
- City of Chickasaw
- City of Semmes
- City of Bayou La Batre
- Town of Dauphin Island
- City of Prichard
- South Alabama Utilities
- Satsuma Water and Sewer
- Mobile Area Water and Sewer System
- Kushla Water
- Turnerville Water
- Lemoyne Water
- Saraland Water and Sewer
- Bayou La Batre Utilities Board
- Department of Conservation and Natural Resources
- Mobile County Engineering Services
- Mobile County Facilities
- Mobile County Emergency Management Agency

One-on-one sessions were held with key stakeholders to include each municipality and technical experts. The meetings were to assist in identifying unmet needs within the respective community. The data received from the one-on-one meetings was then utilized to frame the Local Recovery Plan. Following each one-on-one meeting, stakeholders were asked to provide follow-up documentation to support the verbalized unmet needs. When possible, the stakeholders also provided information and documentation to support the proposed projects. Appendix A: Mobile County Outreach Efforts outlines which stakeholders received outreach as well as responses

received. Appendix D: Non-Match Projects List outlines the proposed projects by all stakeholders who provided feedback and follow up documentation.

## Public Website

The Mobile County Commission has designed a CDBG-DR website that displays all program information, meeting materials, agreements, and methods of communication with the CDBG-DR Mobile County staff. Should the community have any feedback or questions regarding the CDBG-DR program, the Mobile County Commission has developed an email for the community to utilize.

The website can be located at:

<https://www.mobilecountyal.gov/cdbg-dr-hurricanes-sally-and-zeta-1/>

Mobile County CDBG-DR email address:

[comments.cdbg-dr@mobilecountyal.gov](mailto:comments.cdbg-dr@mobilecountyal.gov)

## Public Hearings and Related Comment Periods

Communication and outreach to citizens were conducted on a community-wide basis and actively involved all citizens, inclusive of those individuals and groups identified in the above section.

### PUBLIC HEARING MEETING TIMES AND LOCATION

Mobile County Commission held two public hearings to present the Local Recovery Plan and take citizen comments.

| Public Hearing  | Date | Location                            | Method of Outreach   |
|---|------|-------------------------------------|--|
| <b>Public Hearing #1</b><br>Presentation of the local Recovery Plan   | TBD  | Mobile County Government Plaza      | Published in the local newspaper and the Mobile County CDBG-DR Website |
| <b>Public Hearing #2</b><br>Final comments on the Local Recovery Plan | TBD  | Mobile County Commission Conference | Published in the local newspaper and the Mobile County CDBG-DR Website |

All public hearings were held at times and locations that are accessible to all citizens and groups with special consideration for those with disabilities. All public comments are outlined in Appendix E: Summary of Public Comments and Appendix F: County Responses to Public Comments.

### PUBLIC NOTIFICATION(S):

The County provided at least fourteen (14) days' (commencing on the date of publication) notice of public hearings by publishing in one or more local newspaper(s) of general circulation, as defined in the Code of Alabama Title 6, Section 6-8-60, and/or by including electronic notice on the Grants Department website. Additional notifications (as deemed appropriate) were also provided to others, including individuals, groups, organizations, and members of the Urban County using social media and/or electronic mail.

## **PUBLIC HEARING FOR LOCAL RECOVERY PLAN ADOPTION**

In addition to the five public engagement meetings, two public hearings were held to obtain questions, opinions of the community and to respond to the Local Recovery Plan. The final Local Recovery Plan was then presented to the Mobile County Commission on X,XX,2024 for a vote to adopt the final plan before submission to ADECA.

# Local Recovery Plan

## Proposed Use of Funds

The proposed use of funding has been developed through a comprehensive needs assessment process, incorporating feedback from local stakeholders, community members, and relevant agencies. The primary goal is to prioritize projects that provide the greatest benefit to the affected populations, focusing on the most vulnerable and severely impacted areas.

The below section provides detailed descriptions of the specific programs and projects that will be funded and the anticipated outcomes. This approach ensures that CDBG-DR funds are directed towards initiatives that will make the most substantial contribution to the long-term recovery and resilience of Mobile County.

Table 28 – Proposed Use of Funds

| Activity         | Unmet Needs          | ADECA Allocation    | % of Unmet Need |
|------------------|----------------------|---------------------|-----------------|
| Housing Programs | \$68,222,867         | \$12,135,432        | 18%             |
| Infrastructure   | \$95,659,036         | \$15,244,376        | 16%             |
| <b>Total</b>     | <b>\$163,881,903</b> | <b>\$27,379,808</b> | <b>17%</b>      |

## MID Recovery Zones

Mobile County was identified by ADECA as a Hardest Hit Most Impacted and Distressed (HHMID) county post Hurricanes Sally and Zeta. Upon Mobile County’s further assessment of the disaster damages, MID Recovery Zones were identified within the County.

ADECA defines MID Recovery Zones as designated areas within a MID county. The zones focus on areas identified in the Unmet Needs Assessment that were substantially impacted by Hurricanes Sally and Zeta. The goal of identifying MID Recovery Zones is to, when possible, focus recovery efforts within these areas. By focusing on these areas, the County will address the needs of those most vulnerable post disasters.

Mobile County uses HUD’s LMI data paired with CDC SVI data to identify the MID Recovery Zones, which ultimately leads to the path of program and project selection. The graphic below (**Figure 9**) shows the SVI categories that make up the index. The overall SVI captures the four main categories of vulnerability: socioeconomic status, household characteristics, racial and ethnic minority status, and housing type and transportation.



Figure 9 – Overall Social Vulnerability Categories

|                              |  |  |
|------------------------------|--|--|
| <b>Overall Vulnerability</b> | <b>Socioeconomic Status</b>                | Below 150% Poverty   |
|                              |  | Unemployed   |
|                              |  | Housing Cost Burden  |
|                              |  | No High School Diploma   |
|                              |  | No Health Insurance  |
|                              | <b>Household Characteristics</b>           | Aged 65 & Older  |
|                              |  | Aged 17 & Younger  |
|                              |  | Civilian with a Disability   |
|                              |  | Single-Parent Household  |
|                              |  | English Language Proficiency   |
|                              | <b>Racial &amp; Ethnic Minority Status</b> | Hispanic or Latino (of any race), Black or African American, Not Hispanic or Latino Asian, Not Hispanic or Latino American Indian or Alaska Native, Not Hispanic or Latino Native Hawaiian or Pacific Islander, Not Hispanic or Latino Two or More Races, Not Hispanic or Latino Other Races, Not Hispanic or Latino |
|                              | <b>Housing Type &amp; Transportation</b>   | Multi-Unit Structures  |
|                              |  | Mobile Homes   |
|                              |  | Crowding   |
|                              |  | No Vehicle   |
|                              |  | Group Quarters   |

The following criteria were assessed to determine the MID Recovery Zones within Mobile County:

- Census tracts with an Overall SVI in the 50th percentile nationally or greater
- Census tracts with 51% or more low- and moderate-income (LMI) individuals

A total of 42 Census tracts qualified as MID Recovery Zones in Mobile County. Of the 42 Census tracts, 15 Census tracts meet both MID Recovery Zone criteria and 27 Census tracts meet one MID Recovery Zone criterion. A list of all of the MID Recovery Zone Census tracts can be found in *Error! Reference source not found.29*.

Areas that fall within the MID Recovery Zones in Mobile County are the northern portion of the County (including Citronelle and Mt. Vernon), areas northeast of the City of Mobile (including Saraland, Chickasaw, and Prichard), the U.S. Route 98 corridor northwest of the City of Mobile (including Semmes and Wilmer), and south of the City near Theodore and Bayou La Batre. Areas with the lowest Overall SVI are around Prichard and tracts to the south of the City of Mobile.

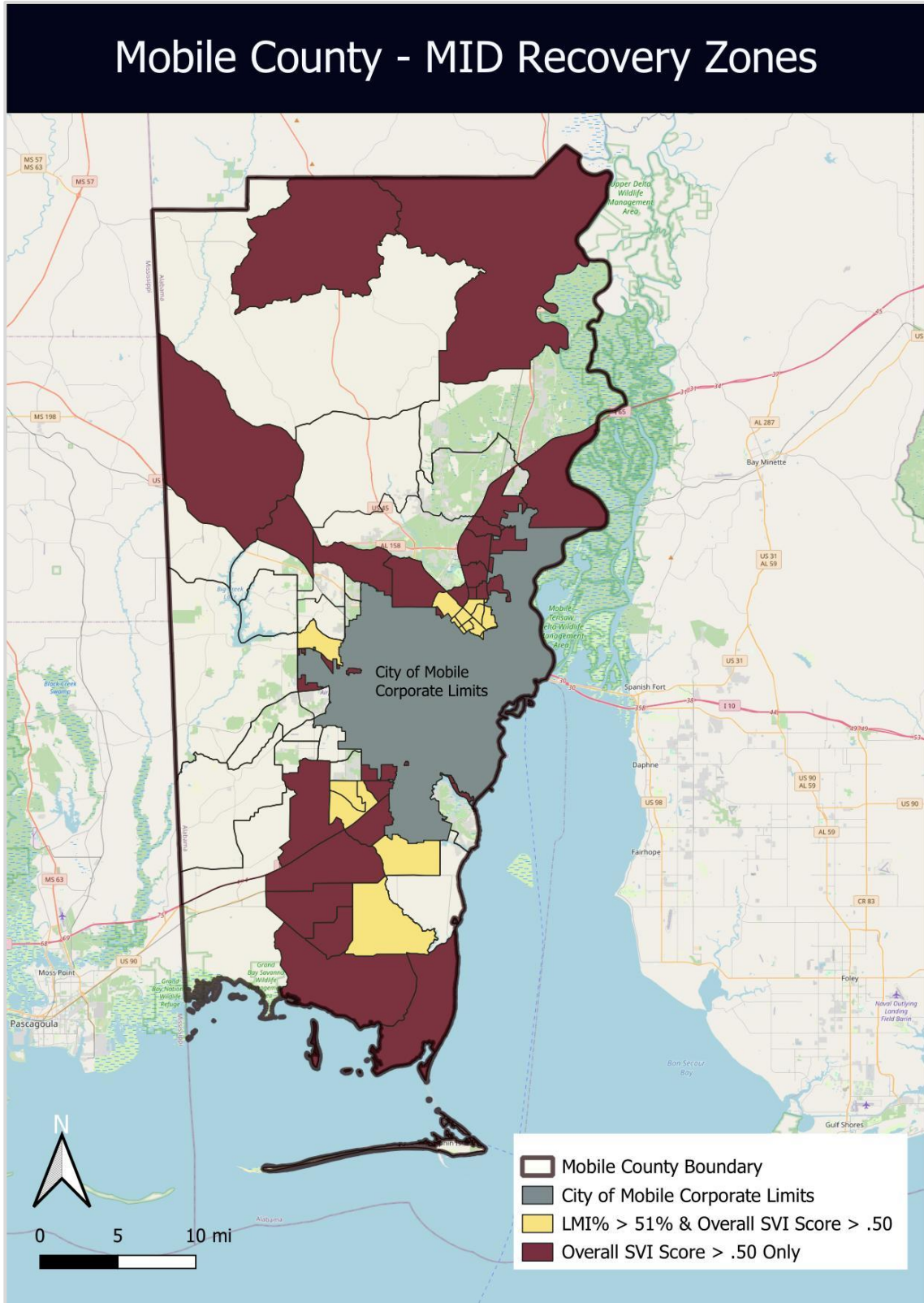
Table 29 - MID Recovery Zone Census Tracts

| Meet Two MID Recovery Zone Criteria | Meets SVI Recovery Zone Criteria Meet One MID Recovery Zone Criterion |                    |
|-------------------------------------|---|--------------------|
| Census Tract 12                     | Census Tract 19.01  | Census Tract 62.01 |
| Census Tract 39.01                  | Census Tract 19.02  | Census Tract 63.05 |
| Census Tract 39.02                  | Census Tract 34.02  | Census Tract 64.03 |
| Census Tract 40                     | Census Tract 38   | Census Tract 65.01 |
| Census Tract 41                     | Census Tract 50   | Census Tract 67.02 |
| Census Tract 48                     | Census Tract 51   | Census Tract 67.03 |
| Census Tract 49                     | Census Tract 52   | Census Tract 67.04 |
| Census Tract 64.02                  | Census Tract 53   | Census Tract 68.02 |
| Census Tract 69.03                  | Census Tract 54   | Census Tract 69.02 |
| Census Tract 69.04                  | Census Tract 55   | Census Tract 71.01 |
| Census Tract 71.02                  | Census Tract 56.02  | Census Tract 72.04 |
| Census Tract 72.01                  | Census Tract 58   | Census Tract 73    |
| Census Tract 75                     | Census Tract 60   |                    |
| Census Tract 76                     | Census Tract 61.02  |                    |
| Census Tract 77                     | Census Tract 61.03  |                    |

The Mobile County MID Recovery Zones were used to guide the development of the projects and programs outlined in the Local Recovery Plan. When assessing programs and projects, the County used the MID Recovery Zones to ensure that the projects and programs selected would benefit and make the greatest impact on the identified MID Recovery Zone areas. By ensuring that the most vulnerable populations and most impacted areas across the County receive the bulk of the support from CDBG-DR, the Mobile County Commission will be able to confirm that gaps are being addressed and the funding is being utilized to its greatest extent. The below outlines what was used to develop the Mobile County Recovery MID Zones:

- Mobile County Boundaries
- Removal of the City of Mobile Corporate Limits
- LMI % > 51% and Overall SVI Score > .50
- Overall SVI Score of > .50 Only

Figure 10 – Mobile County MID Recovery Zones Map



Source: HUD LMI Block Group Data and CDC/ASDR SVI 2020 Documentation

# Program Details

## Housing Programs and Projects

In the aftermath of a disaster, housing programs play a critical role in the community’s road to recovery. By providing housing assistance, these programs will assist with expediting the recovery process for impacted individuals. This enables households and individuals to return to stable living conditions and begin rebuilding their lives more quickly.

The housing projects and programs below are designed to help maintain community stability and nurture community growth. They will prevent displacement and ensure that residents may remain in their neighborhoods, coordinate a social network and provide normalcy during and after a chaotic time. These programs will enhance energy efficiency through application of the Energy Star standard while enforcing safe and sanitary housing requirements.

The project and programs were designed so that, if funding is not fully utilized by one project or program, the County can shift funding to another project or program. When shifting funding, priority will be given to projects or programs that will greatly benefit the Recovery MID Zones or have a remaining unmet need after allocations have been made.

## Homeownership Downpayment Assistance Program

The Homeownership Downpayment Assistance Program (HDAP) will address the needs of homeowners who lost their homes in the 2020 disasters and support affordable homeownership for low- and moderate-income renters impacted by the storms. While this program will give priority to LMI homeowners and renters who were impacted by the 2020 storms, LMI individuals who are on the path to homeownership are also encouraged to apply. Coordination between the Mobile County Commission and units of local government or non-profit organizations will occur to provide housing counseling, training/homeowner education, homebuyer program delivery, and financial management services, including homebuyer down payment and closing cost assistance. This program will also provide forgivable loans to LMI homeowners who lost their homes in the disaster and have insufficient funds from other sources. The program is intended to primarily serve the LMI population. Where appropriate, participating organizations will coordinate with developers funded through other affordable housing programs to match displaced homeowners and prospective homeowners with new housing units.

### **ACTIVITY DESCRIPTION**

The HDAP will be designed to provide Low-to-Moderate Income (LMI) individuals who are eligible with homeownership assistance. Eligible individuals could receive downpayment assistance, closing cost assistance, and “principal reduction”<sup>35</sup> assistance in the form of a forgivable junior-

---

<sup>35</sup> Principle reduction is designed to assist borrowers as loan funds that will be used to help reduce the loan-to-value to an amount not less than 100 percent.

lien (i.e., a second mortgage that is subordinate to the primary mortgage). Additionally, eligible individuals will be required to complete housing counseling, which includes homeownership education and financial management training.

### **NATIONAL OBJECTIVE**

This program is designed to assist LMI individuals in achieving homeownership. By delivering assistance to the targeted LMI population, this program will utilize the LMI Housing national objective pursuant to 24 CFR 570.483(b)(3) and related provisions of the applicable HUD Federal Register Notices.

### **ELIGIBLE ACTIVITIES**

HDAP will be administered by the Mobile County Commission with the goal of providing non-construction forms of affordable housing assistance including down payment and closing cost assistance, gap financing, housing counseling and related incidental costs. These activities are eligible pursuant to the applicable HUD Federal Register Notices, 24 CFR 570.482, and Title I of the Housing and Community Development Act of 1974.

### **ELIGIBILITY CRITERIA**

The program will be restricted to households earning less than 80% AMI at the time of application. Homeowners will be required to reside in their homes for a minimum of five (5) years prior to the sale in order to not incur pre-sale penalties.

**Generally, the maximum amount of assistance will not exceed \$50,000 per beneficiary.**

### **TIEBACK TO THE STORM**

Hurricane Sally brought substantial amounts of rain throughout Southwestern Alabama, in some cases approximately 29 inches<sup>36</sup>, creating widespread flooding following landfall. Many homes became uninhabitable or were destroyed as a result of damage caused by the disasters, thereby leaving many in the community homeless or living in damaged housing. Activities under this program are designed to address the needs of LMI individuals whose housing situation was negatively impacted by the storms.

### **PROGRAM PRIORITIES**

The program goal is to provide assistance to eligible participants who were impacted by the 2020 hurricanes. Applications from LMI populations who lived within the County prior to either of the storms will be prioritized. Assistance will be provided so that it prioritizes addressing the needs of eligible homeowners whose homes were destroyed as a result of the 2020 hurricanes. Additionally, impacted renters earning less than 80% of AMI will also have priority.

---

<sup>36</sup> [https://www.nhc.noaa.gov/data/tcr/AL192020\\_Sally.pdf](https://www.nhc.noaa.gov/data/tcr/AL192020_Sally.pdf)

## FEASIBILITY

Individuals assisted by the Homeownership Downpayment Assistance Program will enter into an agreement with the Mobile County Commission outlining the terms and conditions of the assistance provided. This agreement allows for the Mobile County Commission to properly comply with all cross-cutting requirements required by HUD.

## BUDGET

The Mobile County Commission will allocate \$3,000,000 of CDBG-DR funding to this program with an additional 13.5 percent for Activity Delivery Cost of \$405,000, totaling \$3,405,000.

## TIMELINE

The Mobile County Commission will be the responsible entity for this program. Following acceptance of the LRP by the State, the Mobile County Commission is prepared to start up the program in compliance with the rules and regulations set forth by the State and HUD. HDAP will be conducted in phases, given the program dependencies on homeowners and tenants, and each phase will vary in quarter completion.

| Phase I : 3-6 Months  | Phase II: 6-9 Months  | Phase III - 9-18 Months  |
|---|---|--|
| <ul style="list-style-type: none"><li>• MCC releases NOFO</li><li>• Program applications are submitted</li><li>• MCC reviews applications for eligibility</li></ul> | <ul style="list-style-type: none"><li>• MCC awards applicants</li><li>• Applicants submit necessary documentation and information</li></ul> | <ul style="list-style-type: none"><li>• Selected applicants execute the HADP agreement and assistance is obtained</li><li>• MCC conducts annual compliance review</li><li>• Project closeout</li><li>• Project file is maintained for required retention timeframe</li></ul> |

## PARTNERS

Non-profit organization Lifelines Counseling Center

## Voluntary Homeowner Buyout Project

### ACTIVITY DESCRIPTION

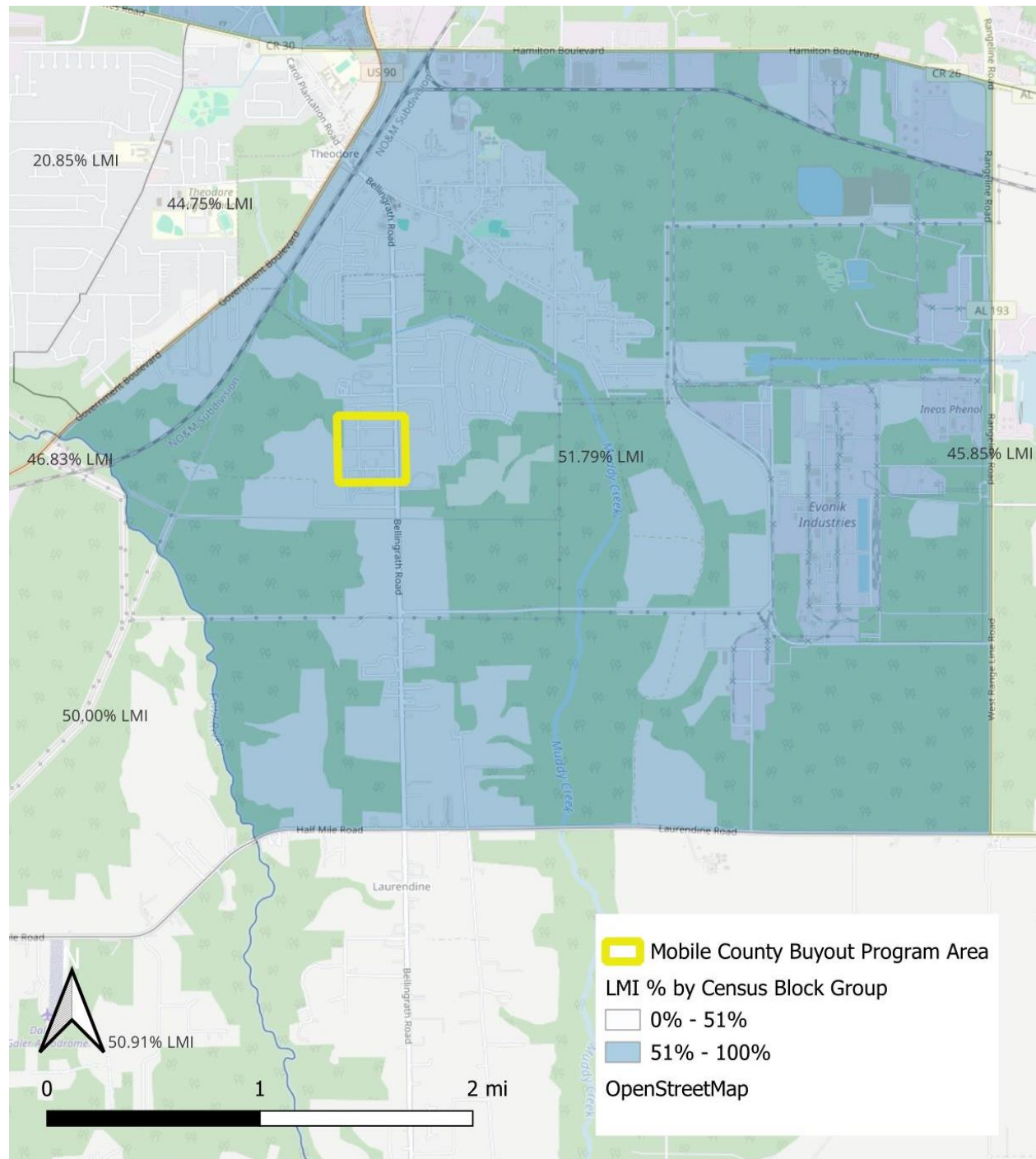
The Voluntary Homeowner Buyout project (VHB) will acquire property in the targeted location of Mardanne Drive to Thomas Drive in Theodore, Alabama, which is in a high-risk flood area, to reduce the impact of future disasters and repetitive loss. The targeted location is a low-lying and flood prone area and has been identified using repetitive flooding data. Once properties are purchased, permanent structures will be demolished, and the land will be deed-restricted allowing for the following uses:

- Natural green space.
- Recreation
- Stormwater management.

## NATIONAL OBJECTIVE

The primary National Objective of the buyout project will be the Low-Moderate-Income Area Benefit (LMA) pursuant to 24 CFR 570.483(b)(1). To meet the LMA National Objective, the acquired properties must be re-used in a way that benefits all residents in an area where at least 51 percent of the residents are low-and moderate-income persons.

Figure 11 – Voluntary Homeowner Buyout LMA Map



## **ELIGIBLE ACTIVITIES**

CDBG-DR funds will be used for eligible residential properties, which may include owner-occupied structures, residential rental properties, or vacant lots. Buyout activities are made permissible under the applicable HUD Federal Register Notices governing the CDBG-DR funding. Mobile County will focus efforts on targeted properties located within the Recovery MID Zones, which displayed social vulnerabilities.

## **ELIGIBLE COSTS**

Buyout project costs may include, but are not limited to:

- Fees for necessary appraisal costs, title search, title insurance, property inspection, and survey if applicable.
- Buyout purchase price.
- Clearance and demolition (performed by a procured contractor).
- Fees paid for environmental review services.
- Replacement housing incentive payments.
- Costs related to the Uniform Relocation Act.
- Related incidental costs.

## **ELIGIBILITY CRITERIA**

The County has identified an area from Mardanne Drive to Thomas Drive in Theodore, Alabama, a low-lying and flood prone area that includes a total of approximately 20 homes that could potentially participate in the buyout. In pursuing potential buyouts, the County will comply with Uniform Relocation Act regulations set forth at [49 CFR 24.101\(b\)\(1\)](#), 24 CFR 42, as well as HUD's implementing guidance in HUD Handbook 1378 (Tenant Assistance, Relocation and Real Property Acquisition).

## **TIEBACK TO THE STORM**

Hurricanes Sally and Zeta delivered extensive rainfall throughout Mobile County, creating widespread flooding following the disasters. Many residents who have homes in low-lying, high-risk flood areas, have experienced repetitive flood losses and particularly felt the devastation of these two disasters. The program has identified low-lying and flood prone areas that include a total of approximately 20 homes throughout Mobile County that flooded as a result of rainfall associated with these two storms.

## **PROGRAM PRIORITIES**

Implementation of this project serves multiple objectives and provides a mitigation opportunity versus rebuilding in a high-risk environment. Historically, buyouts help prevent repetitive loss and extreme risk to human health and safety. The overarching goals of the buyout projects are:

- Acquire properties that were impacted by Hurricanes Sally and Zeta and convert the property to public space, green space, and/or flood control infrastructure.



- Provide mitigation to the County against future flood damages, effects of sea level rise, and health and safety risks for owners and residents.
- Reduce the impact of future disasters and heavy rain events.

Buyout participants will adhere to the following process:

1. Registration/Application – The County will conduct outreach to local residents in order to gauge interest and participation in a buyout project. Preliminary information and documentation will be collected at this time to determine and organize a list of interested participants. Submitted documentation will be reviewed by the County for eligibility.
2. Determine Buyout Amounts and provide URA notices (if applicable) – All properties will have a formal appraisal conducted to determine current fair market value. Once a Duplication of Benefits check has been completed, the County will present the purchase offer to the homeowner. In an effort to assist the homeowner with obtaining a new home, the County will allow, in addition to the buyout price, for a Housing Replacement Allowance of \$25,000 for income eligible properties and \$10,000 for non LMI properties. Housing replacement assistance will be limited to owner-occupied properties. Owners of vacant land and rental properties are not eligible for housing replacement assistance. Tenants of rental properties participating in the VHBP may be eligible to receive relocation assistance under the Uniform Relocation Act.
3. Property Purchase – The County will approve closing documents including contract, restrictive covenant, legal notices for demolition, title searches, and title insurance. Upon County approval, closing occurs and the property title will be transferred to the County or municipality, as applicable.
4. Conduct Clearance and Demolition – If required, legal notices will need to be delivered prior to any clearance or demolition occurring. All clearance/demolition will occur by the awarded demolition contractor. The contractor will be the responsible party for obtaining any necessary permits prior to demolition. To maintain compliance with cross-cutting requirements, inspection of the property by County staff must take place prior to demolition. Once the County approves, demolition will occur.
5. Open Space Management – Properties will be managed and maintained by the County or municipalities, as applicable. The parcel should be maintained as open space unless other allowable uses, as defined in and permitted by HUD’s Federal Register Notices, have been approved.

## **FEASIBILITY**

The targeted buyout area has been assessed and determined to have repetitive flooding and on-going loss. Once approval of the LRP has been obtained, the County will begin conducting outreach to the Mardanne Drive to Thomas Drive area to gauge individual interest. Additionally, the County will begin the procurement process for activities such as:

- Environmental Assessment

- AE Services
- Appraisal Services
- Title Services
- Demolition

The Mobile County Commission will ensure compliance with all cross-cutting and reporting requirements.

**BUDGET**

The Mobile County Commission will allocate \$1,739,130 of CDBG-DR funding to this program with an additional 13.5 percent for Activity Delivery Cost of \$234,782.55, totaling \$1,973,912.55.

**TIMELINE**

The following milestones have been established for all buyout projects and will be closely monitored by the Mobile County Commission:

| Project Milestones/ Deliverables                                      | Phase                       |
|---|-----------------------------|
| Obligation Date   | Phase I – 3 to 6 months     |
| Procures Necessary Services   |                             |
| Conducts Title Search and Appraisals on properties                    |                             |
| Make offers to the property owners, provides deadline to accept offer | Phase II – 6 to 12 months   |
| Closing on properties is preformed                                    |                             |
| Deed Restrictions are documented and recorded                         |                             |
| Demolition of structures and removal of debris                        | Phase III – 12 to 24 months |
| Project Completion Date   |                             |
| Final Reporting and Final Reimbursement Request                       |                             |
| Project Closeout  |                             |

**PARTNERS**

The VHBP will require coordination at the local level as well as with the homeowners and tenants. The Mobile County Commission is prepared to have an active role with each project to ensure that the proper partnerships are established and maintained. Currently, established partners include, but are not limited to:

- The Mobile County Commission
- Local Municipalities
- Property Management Companies
- Property Owners/ Tenants
- Procured Consultants/Contractors

# Development of Affordable Rental Housing Program

## ACTIVITY DESCRIPTION

CDBG-DR funding will be used to support the construction of new affordable rental housing units for low-income<sup>37</sup> households. The overarching goal of this program is to:

- Expand the current supply of safe, sanitary, and affordable housing units across Mobile County.
- Support the LMI community need for additional affordable housing units.
- Encourage public, private, and non-profit partnerships to address affordable housing needs.
- Support community growth and opportunities with the implementation of affordable housing.
- Support community resiliency.

This program will provide gap financing to affordable rental projects located within Mobile County. The program will target housing that is affordable to individuals and households who are at or below 50% of the area's median income ("AMI"). In exchange for low-cost permanent financing assistance, owners of new construction projects will agree to rent restrictions and to rent to income-qualified tenants for at least 20 years. Projects will be monitored for compliance during this 20-year affordability period. Project sponsors will be responsible for coordinating various funders' requirements when there are multiple funding sources.

## NATIONAL OBJECTIVE

This program will meet the LMI national objective of providing affordable housing to LMI households pursuant to 24 CFR 570.483(b)(3).

## ELIGIBLE ACTIVITIES

Mobile County will entertain a project that proposes new construction and acquisition/rehabilitation of multifamily rental developments and single-family rental units. This may include awards financing the residential component of mixed-use projects, but mixed-use projects may trigger additional requirements. Selection preference will be given to projects that include preferences for, or restrict units exclusively to, seniors, special needs, or other vulnerable populations. Any preferences/restrictions proposed must be clearly disclosed in the application for funding and may not violate Federal, State, or local nondiscrimination requirements. New construction of housing is made eligible for CDBG-DR assistance pursuant to provisions of the applicable HUD Federal Register Notices.

---

<sup>37</sup> The U.S. Department of Housing and Urban Development (HUD) defines low-income individuals as those with a family income that is less than 50% of the area median income (AMI), and moderate-income individuals as those with a family income between 50% and 80% of the AMI. HUD uses Census data to identify areas where at least 51% of households have incomes at or below 80% of the AMI.

## **ELIGIBLE COSTS**

Eligible project costs may include, but are not limited to:

- Acquisition of property – This may include vacant land or existing housing to be rehabilitated.
- Hard costs related to construction or rehabilitation.
- Architectural and engineering costs associated with project design.
- Accounting and legal costs associated with acquisition, financing, and construction of the project.
- Incidental costs associated with project implementation.

## **ELIGIBILITY CRITERIA**

Developers of affordable rental housing – including nonprofit developers and PHAs - are encouraged to apply for this program. Once selected, the Mobile County Commission will enter into a funding agreement with the project developer.

## **TIEBACK TO THE STORM**

This program directly responds to the damage sustained from Hurricanes Sally and Zeta to the affordable housing stock in Mobile County. Both Hurricanes brought significant wind and water damage to the affordable housing inventory, compromising the safety and habitability of the units. The storm damage reduced the affordable housing inventory across the County, thereby already exacerbating an acute shortage of affordable units for low and moderate-income residents.

## **PROGRAM PRIORITIES**

The overarching program goal is to increase the availability of rental housing that is affordable to low-and moderate-income persons/households, with a particular emphasis on low- and very low-income populations. Projects serving vulnerable populations within Mobile County will receive priority.

The need to emphasize affordable housing and resiliency as part of the County’s long-term recovery efforts became evident in the wake of the 2020 disasters. The loss of a proportion of the County’s affordable housing stock due to the hurricane damage highlights the overall lack of affordable rental housing within the County.

## **FEASIBILITY**

Prior to the award of funding, projects will need to demonstrate that they have already secured commitments for additional funding sources and will utilize CDBG-DR funding as a “gap financing” source. In doing so, this will allow the projects to become feasible given the funding restraints of the program.

## BUDGET

The Mobile County Commission will allocate \$4,500,000 of CDBG-DR funding to this program with an additional 13.5 percent for Activity Delivery Cost of \$607,500, totaling \$5,107,500.

## TIMELINE

| Project Milestones/ Deliverables                           | Phase                    |
|--|--------------------------|
| Application review and selection                           | Phase I: 0-9 Months      |
| Design, Environmental Review, Permitting, and Underwriting |                          |
| Closing  |                          |
| Construction or rehabilitation                             | Phase II: 9 -18 Months   |
| Monitoring and compliance                                  |                          |
| Request for Reimbursement                                  |                          |
| Construction completion                                    | Phase III: 18 -24 Months |
| Final Request for Reimbursement                            |                          |
| Project Closeout   |                          |
| Ongoing Monitoring and Maintenance                         |                          |

## PARTNERS

- The Mobile County Commission
- Non-profit organizations
- For profit developers
- Local Municipalities

## Public Housing Authority Improvements Project

### PROJECT DESCRIPTION

The Public Housing Authority (PHA) Improvements Project seeks to repair, renovate, and strengthen the infrastructure of Mobile County Housing Authority, the Housing Authority of the City of Chickasaw, and the Housing Authority of the City of Prichard. The improvements will enhance resilience against future disasters, ensure the safety and well-being of residents, and support long-term housing stability.

### Mobile County Housing Authority

Due to the significant rainfall and wind damage caused by Hurricanes Sally and Zeta, units of the Mobile Housing Authority are in need of roof, gutter, ceiling and drywall repairs and replacements.

### Housing Authority of the City of Chickasaw

The Housing Authority of the City of Chickasaw received significant wind damage as a result of Hurricane Zeta. The project proposes to replace the damaged windows, which will enhance energy efficiency and improve the overall living conditions.

### Housing Authority of the City of Prichard

The Housing Authority of the City of Prichard is in need of resilience enhancement that includes integration of features to improve long-term resilience, such as reinforced roofs, improved drainage systems, and energy-efficient upgrades.

By making these critical improvements, the project supports LMI households and contributes to the overall sustainability of the community.

### NATIONAL OBJECTIVE

The Public Housing Authority Improvements project meets the National Objective of low- and moderate-income persons. The improvements are targeted towards public housing units primarily occupied by LMI households, ensuring that the most vulnerable populations receive the necessary support to recover from disaster impacts and improve their quality of life.

### TIEBACK TO THE STORM

The project directly responds to the damage and disruption caused by Hurricanes Sally and Zeta. Both Hurricanes brought significant wind and water damage to the public housing facilities, compromising the safety and habitability of the units. The storms created access challenges for the residents and staff. Additional disaster related tieback and/or mitigation need will be documented in the project application.

### BUDGET

The Mobile County Commission will allocate \$1,450,000 of CDBG-DR funding to this project with an additional 13.5 percent for Activity Delivery Cost of \$195,750, totaling \$1,645,750. If additional funding should become available through the developed Housing programs due to underutilization, Mobile County will shift funding to the PHA project to further meet the unmet needs of the PHA's. The County will also work with the PHAs to leverage any existing funding to meet the unmet need and to avoid duplication of benefits.

### TIMELINE

| Milestone/ Deliverable                      | Phase and Timeline                    |
|---|---------------------------------------|
| Assessment and Planning                     | Phase One: 1-6 Months                 |
| Design, Environmental Review and Permitting | Phase Two: 6-12 Months                |
| Construction and Rehabilitation             | Phase Three: 12-36 Months             |
| Monitoring and Maintenance                  | Phase Four: Ongoing post construction |

## **PARTNERS**

The Mobile County Commission will partner with the Mobile County Housing Authority, the Housing Authority of the City of Chickasaw, and the Housing Authority of the City of Prichard.

## **Infrastructure Program and Projects**

The Infrastructure Program and Projects seek to rebuild and enhance both critical and essential infrastructure that was damaged or destroyed due to Hurricanes Sally and Zeta. The program and projects will focus on creating resilient infrastructure that can withstand future disasters, thereby ensuring the safety and well-being of the community. They will restore and improve key infrastructure such as bridges and public facilities that are critical to the community's resilience in the aftermath of a disaster.

The project and programs were designed so that if funding is not fully utilized by one project or program the County can shift funding to another project or program. When shifting funding, priority will be given to projects or programs that will greatly benefit the Recovery MID Zones or have a remaining unmet need after allocations have been made.

## **Permanent Generators for Critical Facilities Program**

### **ACTIVITY DESCRIPTION**

This program aims to install and/or upgrade generators in critical facilities in Mobile County to ensure continuous power supply during disasters, enhance resilience, and ensure the safety and well-being of residents. As per the County's regional hazard mitigation plan, "although many critical facilities have backup power generation in the County, there are still a significant number in need of this capability. The lack of this capability increases vulnerability to all hazards."

The program proposes to enhance the resilience of critical infrastructure in disaster-prone areas by installing backup power generators. This program will ensure the continuous operation of essential services during and after disasters, thereby protecting public health and safety.

The County proposes the following phases for the generators program:

- **Application for Funding Process:** Invite Applications from eligible participants.
- **Assessment and Planning:** Comprehensive assessment of critical facilities and their power needs, and development of a detailed implementation plan.
- **Generator Installation:** Procurement and installation of generators in identified critical facilities.
- **Training and Maintenance:** Providing training for facility staff on generator operation and maintenance and establishing ongoing maintenance plans.

The Permanent Generators for Critical Facilities project will ensure continuous power supply during and after disasters, enhance the resilience of critical facilities to support disaster response and recovery efforts and improve overall community preparedness and safety.

## Method of Distribution

To ensure the most effective and equitable allocation of CDBG-DR funds, a competitive application process will be implemented. This process will include:

- Announce the availability of funds and invite applications from eligible facilities within the designated MID recovery zones.
- Application Submission: Provide a standardized application form for applicants to detail their facility's needs, proposed solutions, and anticipated outcomes.
- Develop clear evaluation criteria, including factors such as the critical nature of the facility, the extent of current backup power inadequacies, the proposed project's impact on community resilience, and the cost-effectiveness of the solution.
- Award and Implementation: Notify selected applicants of their awards and provide guidance on project implementation, including compliance with CDBG-DR requirements and timelines.
- Monitoring and Reporting: Implement a monitoring system to track project progress, ensure proper use of funds, and document outcomes. Regular reports will be required from recipients to maintain accountability and transparency.

## NATIONAL OBJECTIVE

This program is designed to meet Low- to Moderate-Area (LMI) Area Benefit standard at 24 CFR 570.483(b)(1) or Urgent Need pursuant to 24 CFR 570.483(d). The Urgent Need (UN) National Objective will only be used when an LMI National Objective cannot be achieved through the project.

## ELIGIBLE ACTIVITY

The eligible activities are the construction, reconstruction, repair or installation of Public Facilities and Improvements (except for buildings for the general conduct of government) as authorized by 24 CFR 570.482 and Section 105(a) of Title I of the Housing and Community Development Act of 1974.

## ELIGIBILITY

To be eligible for this program, the submitted project must meeting the following criteria:

- The addition of a permanent generator will support a critical infrastructure facility in the community.
- Generators will utilize modern technology to ensure that they are optimized for power production, align with the needs of the facility, can operate for an extended period of time, and cover the range of power needs during and after a disaster.
- Prioritize the needs of the local community and first responders in the event of a disaster.
- Support mitigation efforts in the event of another disaster.



## ELIGIBLE APPLICANTS

The program targets a variety of critical facilities, including but not limited to:

- Healthcare Facilities – Hospitals and clinics.
- Emergency Services - Police stations, fire stations, and emergency response centers.
- Public Utilities - Water treatment plants, sewage treatment facilities, and electric substations.
- Community Centers - Shelters, community and senior centers, and schools used as emergency shelters.

## TIEBACK TO THE STORM

Both Hurricanes Sally and Zeta exposed significant vulnerabilities in the power supply to critical facilities such as community centers that served as points of distribution for communities across the County. Alabama Power reported that close to 111,000 customers in Mobile County were without power at the height of Hurricane Sally and 165,000 for Hurricane Zeta. The storms highlighted the need for backup power solutions after disasters. Additional disaster related tieback and/or mitigation need will be documented in the project application.

## PROGRAM PRIORITIES

- To provide reliable backup generators for critical facilities.
- To ensure uninterrupted power supply during emergencies.
- To enhance the operational capacity of critical facilities in disaster scenarios.

## FEASIBILITY

Applications for funding will be reviewed prior to project approval to verify that all program priorities and eligibility criteria have been met. All projects will be vetted to ensure that no choice limiting actions have occurred prior to the release of funding. Mobile County will provide technical assistance to subrecipients to ensure that all cross-cutting requirements are met.

## BUDGET

The Mobile County Commission will allocate \$3,000,000 of CDBG-DR funding to this program with an additional 15 percent for Activity Delivery Cost of \$450,000 totaling \$3,450,000.

## TIMELINE

| Milestone/ Deliverable       | Phase and Timeline                     |
|------------------------------|--|
| Assessment and Planning      | Phase One: 1-6 Months                  |
| Procurement and Installation | Phase Two: 6-12 Months                 |
| Training and Maintenance     | Phase Three: Ongoing post-installation |

## **PARTNERS**

The Mobile County Facilities Department will partner with local municipalities and tribal governments.

## **Disaster Shelter Project**

### **PROJECT DESCRIPTION**

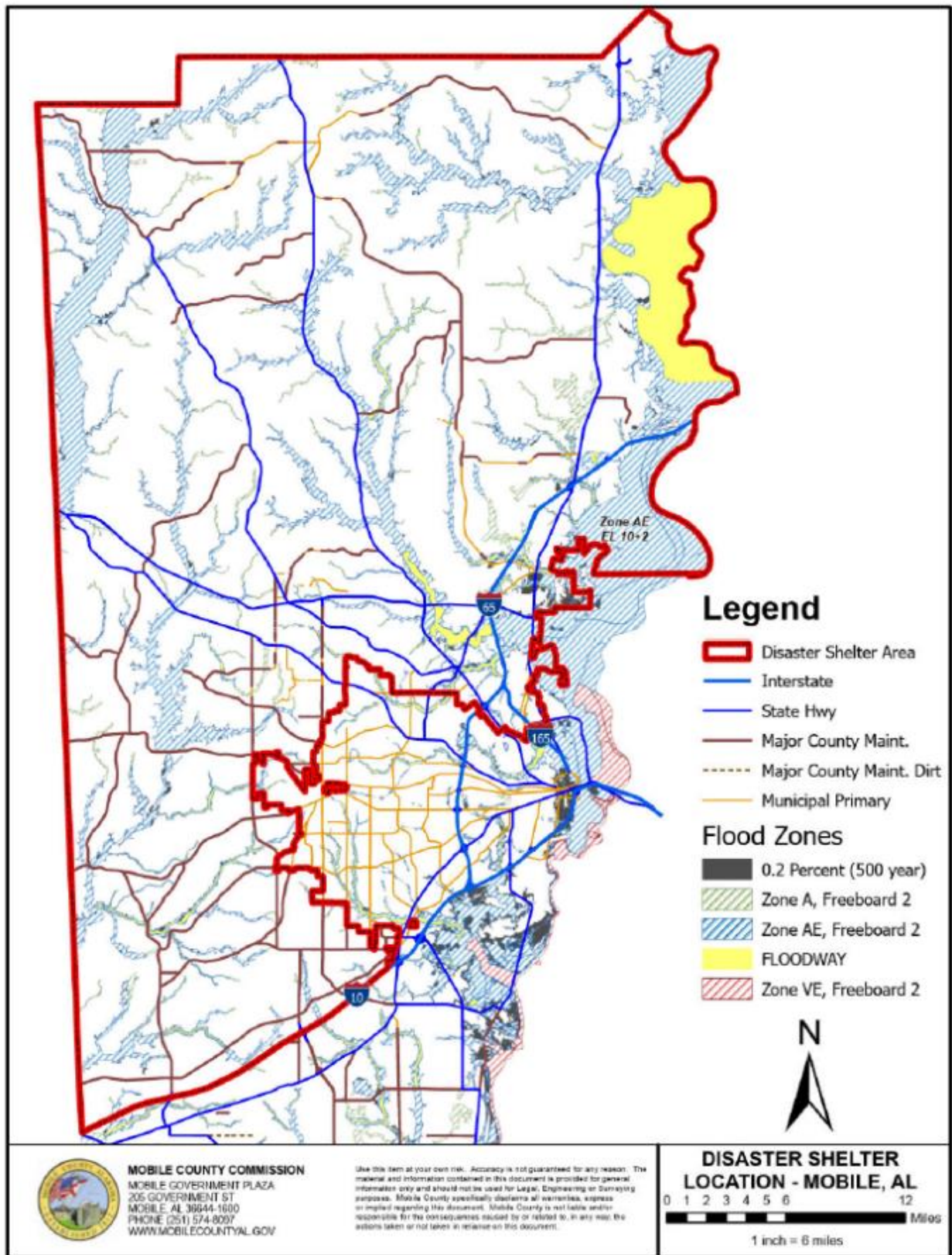
To aid in the recovery from Hurricanes Sally and Zeta and enhance the County's disaster resilience capabilities for future storms, the County is proposing a new Disaster Shelter Project. This project is set to establish a safe and accessible shelter for County residents, as well as expand the County's existing programs in service of its vulnerable populations. The project integrates specific requirements and standards for disaster readiness and community service, ensuring that the facility is not only a critical public facilities project but also a cornerstone of community development and support.

The project will consist of identifying, assessing, and building a new disaster shelter. Phase I will identify potential locations and evaluate the feasibility of a facility within the County that could serve as emergency shelter pre-, during, and post disasters with emphasis on the identified MID Recovery Zones. It will consider establishing a future emergency shelter in high-elevation, low-risk areas with a focus on serving vulnerable populations least likely to have a place to go in an emergency. The assessment will then lead to a detailed design plan. This feasibility assessment will be Countywide.

Phase II will consist of construction of a new Disaster Shelter that was identified as part of Phase I. Construction may include, but will not be limited to, structural integrity of the facilities to withstand severe weather conditions, flood proofing measures, wind protection, and permanent generator power. By identifying, assessing, and building a disaster shelter, this project aims to create a safe and secure facility to provide protection and support to the local communities pre-, during, and post a disaster.

The shelter would meet the American Red Cross' Hurricane Evacuation Shelter Selection Standards.

Figure 12 – Location Map of the Proposed Disaster Shelter



Source: Mobile County

## **NATIONAL OBJECTIVE**

The Disaster Shelter project meets the National Objective of Urgent Need. This project aims to mitigate the risks posed by future disasters by ensuring that an emergency shelter is structurally sound and capable of providing safe and secure protection throughout Mobile County.

## **ELIGIBLE ACTIVITY**

The eligible activity is construction, reconstruction, repair or installation of public facilities and improvements pursuant to 24 CFR 570.482 and Section 105 of Title I of the Housing and Community Development Act of 1974.

## **TIEBACK TO THE STORM**

Mobile County has faced significant challenges due to Hurricanes Sally and Zeta. These hurricanes caused widespread damage, including power outages, flooding, and structural damage to homes, buildings and infrastructure. Existing emergency shelters were found to be inadequate in terms of location and resilience, highlighting the critical need for identifying and building a new facility to ensure they can provide safe refuge pre-, during, and post disasters. Additional disaster related tieback and/or mitigation need will be documented in the project application.

## **BUDGET**

The Mobile County Commission will allocate \$8,155,980 of CDBG-DR funding to this project with an additional 15 percent for Activity Delivery Cost of \$1,223,397, totaling \$9,379,377.

## **TIMELINE**

The project is expected to be completed over a period of 24 months, with key milestones including:

| <b>Milestone/ Deliverable</b>     | <b>Timeline</b> |
|-----------------------------------|-----------------|
| Initial Assessment and Design     | 1-12 Months     |
| Permitting and Approvals          | 4-12 Months     |
| Construction and Retrofitting     | 12-24 Months    |
| Monitoring and Project Completion | 24 Months       |

## **PARTNERS**

The County will identify a potential project partner following Phase I, assessment of potential locations. Partners may include, but are not limited to, local municipalities, non-governmental organizations (NGOs) and tribal governments.

# First Responder's Hurricane Safe Room HMGP Match Project

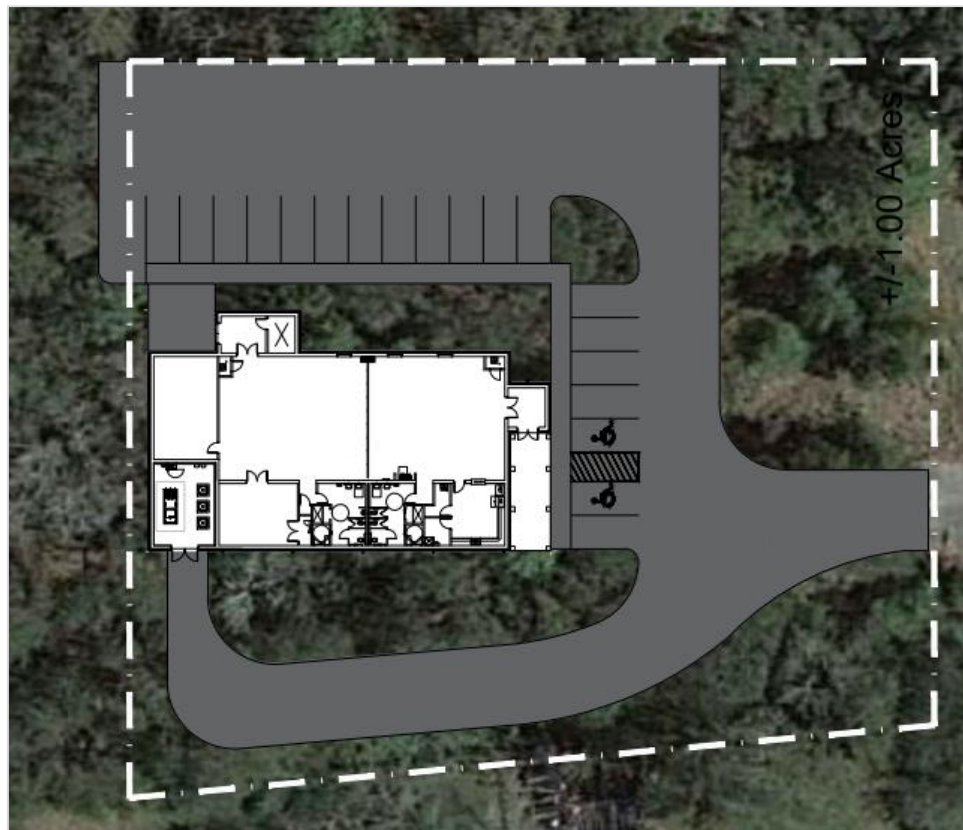
## PROJECT DESCRIPTION

The County has been severely impacted by Hurricanes Sally and Zeta, resulting in significant damage to public infrastructure. In response, FEMA allocates funds through the Hazard Mitigation Grant Program (HMGP) to support projects that reduce the risk of future disasters. Traditionally, this funding source requires a non-federal cost share (local match), which is 25% of the total project cost. However, on August 30, 2022, FEMA approved decreasing the leverage amount to 10% and increased the federal share to 90%. To maximize federal funds and ensure comprehensive recovery and mitigation efforts, the County proposes to use CDBG-DR funds to meet the HMGP local share requirement.

### Project Specifications submitted to FEMA:

The Safe Room is designed for Hurricane Protection and the designed to sustain wind speed up to 200 MPH. All final construction drawings and specifications for this project shall be in compliance with the applicable provisions of "FEMA P-361, Fourth Edition, Guidance for Community and Residential Safe Rooms" April 2021 and ICC 500-2020 and will be so stated on the final construction drawings and specifications. The estimated total occupancy of the safe room will be 153, with an estimate of 6,600 sq ft of space.

Figure 13 – Proposed First Responder Safe Shelter Design



Source: Mobile County

The construction of the first responder safe room aligns with the broader recovery and mitigation goals of the County by:

- Enhancing the community’s overall disaster preparedness and response capabilities.
- Reducing the risk of service disruptions during disasters.
- Contributing to the long-term resilience and safety of the community.

### **NATIONAL OBJECTIVE**

The proposed first responder safe room addresses the national objective of Urgent Need resulting from Hurricane Sally which severely compromised existing emergency response. The lack of a secure, disaster-resistant facility for first responders has been identified as a critical need in the County’s response capabilities. The safe room will ensure that first responders can continue their vital work without interruption, providing critical services to the community pre-, during, and post-disaster. Without a secure safe room, first responders are at risk during extreme weather events, potentially compromising their ability to perform life-saving duties and exacerbating the disaster’s impact on the community.

### **ELIGIBLE ACTIVITY**

Mobile County will follow the eligibility criteria set forth by FEMA as outlined in the HMGP FEMA Program Guide. As per Section 105 (a) (9) of the HCDA, “the use of CDBG-DR funds for payment of the non-Federal share required in connection with a Federal grant-in-aid program undertaken as part of activities assisted” is eligible. This project has been funded by FEMA enabling Mobile County to fund the non-federal cost share.

### **TIEBACK TO THE STORM**

Hurricane Sally caused significant damage, bringing to light the vulnerabilities faced by the community of Mobile, especially the critical first responders who play a vital role during such emergencies. The intense winds, flooding, and widespread damage underscored the urgent need for a dedicated safe room for the first responders. This project aims to establish a secure refuge for these essential personnel, ensuring their safety and enabling them to continue their lifesaving work during and after severe weather events.

The hurricane’s sustained winds of up to 105 mph caused substantial structural damage. Emergency service facilities, including fire stations and police departments, experienced damage, impeding their operations during the hurricane. Over 20 inches of rainfall led to severe flooding, hampering mobility across the critical areas. Flood waters not only affected residential areas, but also emergency services and facilities, compromising their ability to respond. Ensuring the safety of the first responders is paramount. The safe room will provide a secure environment, protecting them from high winds, flying debris, flooding and allowing them to focus on their duties without concern for their personal safety.

## BUDGET

The Mobile County Commission will allocate \$600,000 of CDBG-DR funding to this project with an additional 15 percent for Activity Delivery Cost of \$90,000, totaling \$690,000.

## TIMELINE

The County will collaborate with FEMA, state and county agencies to identify project milestones and ensure efficient implementation that meets both FEMA and CDBG-DR requirements.

| Milestone/ Deliverable            | Timeline      |
|-----------------------------------|---------------|
| Initial Application for Funding   | 3-6 Months    |
| Permitting and Approvals          | 6-9 Months    |
| Construction and Retrofitting     | 9- 18 Months  |
| Monitoring and Project Completion | 18- 24 Months |

The anticipated timeline is subject to change based on the FEMA deliverables and final FEMA timeline.

## PARTNERS

The Mobile County Commission will partner with the Mobile County Environmental Services department.

# Woodland Drive Dam Repair and Reconstruction Project

## PROJECT DESCRIPTION

The Woodland Drive Dam is a critical infrastructure component in Citronelle, Alabama, serving as a flood control structure that protects residential areas, roadways, and public facilities from flooding events. The City of Citronelle, in partnership with Mobile County, proposes the reconstruction of the Woodland Drive Dam to restore its functionality and ensure long-term resilience against future disasters. This project is essential to safeguarding the lives and properties of Citronelle residents and maintaining the integrity of local infrastructure.

The project proposes replacement of the dam outlet structure and pipe. The dam on Woodland Drive is approximately 300 feet long x 25 feet high. Woodland Drive crosses the crest of the dam. The dam impounds a lake of approximately 8 acres which is 18 to 20 feet deep at the outlet. The outlet structure from the dam consists of a corrugated metal riser with a corrugated metal overflow grate and a 24-inch diameter corrugated metal outlet pipe which conveys water through the dam to the discharge point below. An emergency overflow is provided at the north end of the dam. The estimated age of the dam and overflow structure is approximately 50 years but was in satisfactory condition when inspected in April of 2017. If the project is not implemented, approximately 40 residences and emergency personnel will be impacted by a major access road that will continue to flood and increase commute and emergency response times.

The proposed project potentially includes the following key components which are subject to change as assessment of the dam begins and progresses:

- **Dam Assessment and Design:**
  - Comprehensive assessment of the existing dam structure.
  - Engineering design and planning for the reconstruction.
  - Environmental and hydrological studies to ensure compliance with state and federal regulations.
- **Dam Reconstruction:**
  - Demolition of the compromised sections of the existing dam.
  - Construction of a new dam structure, incorporating modern design standards and materials to enhance resilience.
  - Installation of spillways, drainage systems, and overflow channels to improve flood management capabilities.
- **Environmental Mitigation:**
  - Implementation of erosion control measures.
  - Restoration of natural habitats affected by construction activities.
  - Coordination with environmental agencies to minimize ecological impact.
- **Project Management and Monitoring:**
  - Oversight of construction activities to ensure adherence to design specifications.
  - Regular monitoring and reporting of project progress to stakeholders and funding agencies.

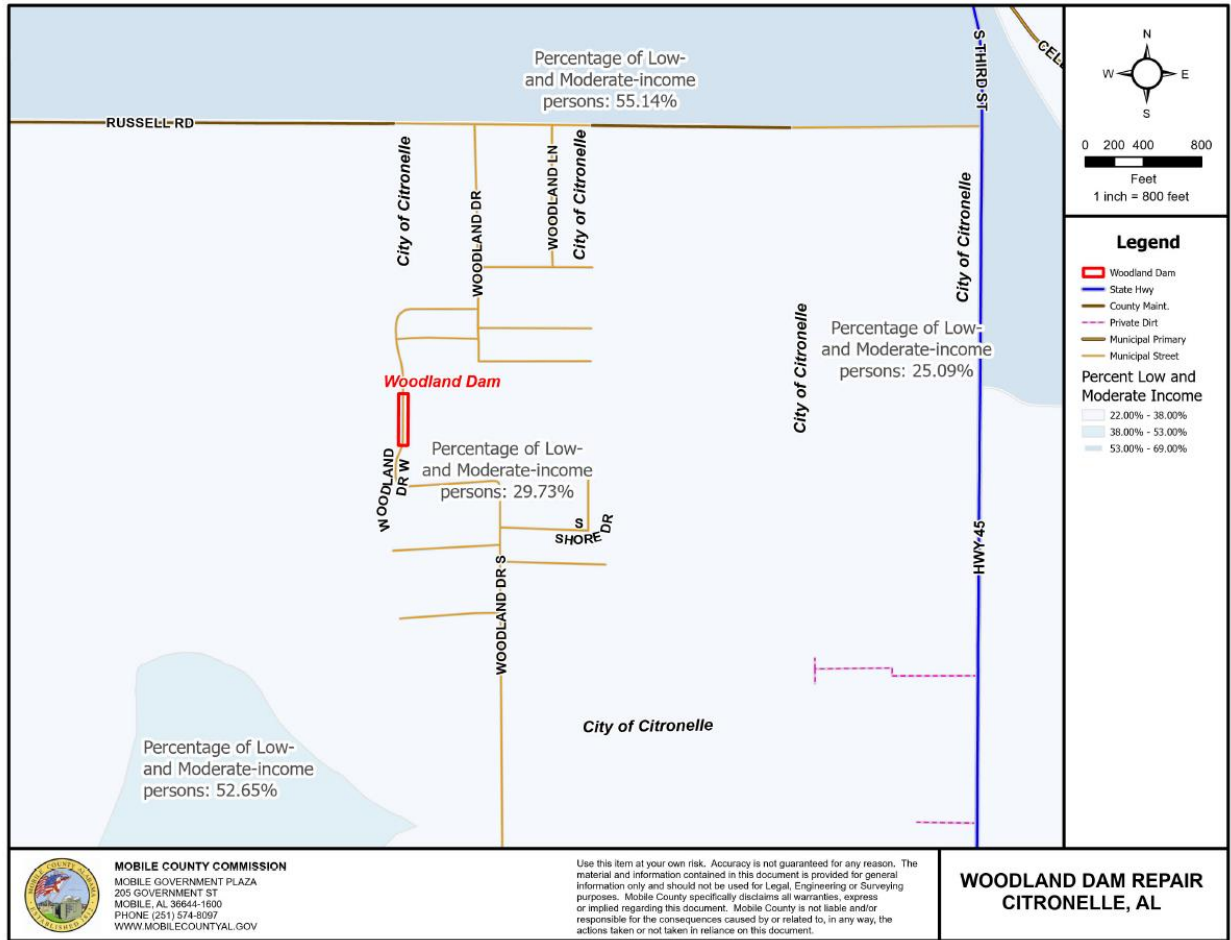
The expected outcomes of this project are:

- Restoration of flood control and mitigation capabilities of the Woodland Drive Dam.
- Enhanced protection for over 40 residential homes, businesses, and public infrastructure in Citronelle.
- Improved community safety and reduced risk of flood-related incidents.
- Increased resilience of the dam against future weather events, reducing the need for emergency interventions.

The Woodland Drive Dam Reconstruction project directly addresses the damage caused by Hurricanes Sally and Zeta, aligning with the objectives of the CDBG-DR program to support long-term recovery efforts in communities and MID Recovery Zones affected by the disasters. The reconstruction will restore the dam's original function and incorporate improvements to enhance its resilience against future storms.



Figure 14 – Woodland Drive Dam Project Map



Source: Mobile County

## NATIONAL OBJECTIVE

The Woodland Drive Dam Repair and Reconstruction project meets the National Objective of Urgent Need pursuant to 24 CFR 570.483(d). As a result of the Hurricanes, flooding caused significant damage resulting in hazardous conditions and a compromised structure which poses a substantial risk to the community due to potential failure.

## ELIGIBLE ACTIVITY

The eligible activity is construction, reconstruction, repair or installation of public facilities and improvements pursuant to 24 CFR 570.482 and Section 105 of Title I of the Housing and Community Development Act of 1974.

## TIEBACK TO THE STORM

Hurricane Sally made landfall as a Category 2 storm, bringing with it prolonged heavy rainfall, storm surge, and high winds. Mobile County, including Citronelle, experienced significant flooding due to the storm's slow movement and the accumulation of over 20 inches of rainfall in some areas. The Woodland Drive Dam, designed to manage stormwater runoff and prevent flooding in

the surrounding residential and commercial areas, was overwhelmed by the unprecedented water flow. The excessive water pressure caused by Hurricane Sally resulted in visible damage to the dam's structure, erosion of its embankments, and damage to the spillways. The dam's ability to manage future stormwater events was greatly reduced, increasing the risk of flooding for nearby properties and infrastructure.

Hurricane Zeta, a fast-moving Category 2 storm, exacerbated the damage caused by Hurricane Sally. Although Zeta was less severe in terms of rainfall, its high winds and the already saturated ground conditions led to additional stress on the Woodland Drive Dam. The combination of these two hurricanes, occurring within a short time frame, further compromised the dam's structural integrity. The dam suffered from increased erosion, further cracking, and displacement of key structural components. Emergency measures were required to prevent a complete breach, and temporary repairs were implemented to mitigate the immediate threat. However, these measures are not sufficient for long-term protection, and the dam remains vulnerable to future storms.

The Woodland Drive Dam is vital for controlling stormwater runoff and mitigating flood risks in Citronelle. Recent weather events have highlighted the vulnerability of the current structure, emphasizing the need for immediate action to prevent potential loss of life, property damage, and disruption of essential services. The reconstruction of this dam will not only restore its original function but will also enhance its resilience to future disasters, aligning with the long-term goals of the CDBG-DR program in an identified MID Recovery Zone.

**BUDGET**

The Mobile County Commission will allocate \$1,500,000 of CDBG-DR funding to this project with an additional 15 percent for Activity Delivery Cost of \$225,000, totaling \$1,725,000.

**TIMELINE**

| Milestone/ Deliverable            | Timeline     |
|-----------------------------------|--------------|
| Initial Assessment and Design     | 1-9 Months   |
| Permitting and Approvals          | 4-12 Months  |
| Construction                      | 12-24 Months |
| Monitoring and Project Completion | 24 Months    |

**PARTNERS**

The Mobile County Engineering Department will partner with the City of Citronelle.

# Appendix A: Mobile County Outreach Efforts

| Municipality Contacted  | Outreach completed (Y/N) | Initial Outreach Date | Additional Outreach Date | Method | Contact Person      | Response/ Comments                           | Meeting (Y/N) | Meeting Date |
|-------------------------|--------------------------|-----------------------|--------------------------|--------|---------------------|--|---------------|--------------|
| City of Citronelle      | Y                        | 3/14/2024             | 4/1/2024                 | Phone  | City Clerk          | Follow up needed                             | N             | N/A          |
| MOWA Tribe              | Y                        | 3/14/2024             | N/A                      | Phone  | Lillie Steiner      | Follow ups provided                          | Y             | 3/19/2024    |
| MOWA Tribe              | Y                        | 3/14/2024             | 3/22/2024                | Phone  | City Clerk          | Follow ups provided                          | Y             | 3/26/2024    |
| City of Creola          | Y                        | 3/14/2024             | N/A                      | Phone  | City Clerk          | Stated no damage                             | N             | N/A          |
| City of Satsuma         | Y                        | 3/14/2024             | 3/22/2024                | Phone  | City Clerk          | Left multiple messages, no response          | N             | N/A          |
| City of Saraland        | Y                        | 3/14/2024             | N/A                      | Phone  | Chief Lovett        | Stated no damage remaining                   | N             | N/A          |
| City of Chickasaw       | Y                        | 3/14/2024             | 3/26/2024                | Phone  | City Clerk          |  | Y             | 4/2/2024     |
| City of Semmes          | Y                        | 3/14/2024             | N/A                      | Phone  | PW Director         | Stated no damage                             | N             | N/A          |
| City of Bayou La Batre  | Y                        | 3/14/2024             | 3/22/2024                | Phone  | City Clerk          | Meeting cancelled, discussion at PE meeting. | N             | N/A          |
| Town of Dauphin Island  | Y                        | 3/14/2024             | 3/22/2024                | Phone  | General Information | Left multiple messages, no response          | Y             | N/A          |
| City of Prichard        | Y                        | 3/14/2024             | N/A                      | Phone  | Finance Director    | Follow ups provided                          | Y             | 3/19/2024    |
| South Alabama Utilities | Y                        | 3/14/2024             | N/A                      | Phone  | General Information | Stated no damage                             | N             | N/A          |

| Municipality Contacted         | Outreach completed (Y/N) | Initial Outreach Date | Additional Outreach Date | Method | Contact Person      | Response/ Comments  | Meeting (Y/N) | Meeting Date |
|--------------------------------|--------------------------|-----------------------|--------------------------|--------|---------------------|---|---------------|--------------|
| Satsuma Water and Sewer        | Y                        | 3/14/2024             | 3/26/2024                | Phone  | C Roley             | Meeting scheduled, not confirmed, contact again week of April 1 | N             | N/A          |
| MAWSS                          | Y                        | 3/14/2024             | 3/22/2024                | Phone  | Calressia Clark     | Stated no damage remaining                                      | N             | N/A          |
| Kushla Water                   | Y                        | 3/14/2024             | 3/22/2024                | Phone  | General Information | Left multiple messages, no response                             | N             | N/A          |
| Turnerville Water              | Y                        | 3/14/2024             | 3/22/2024                | Phone  | General Information | Left multiple messages, no response                             | N             | N/A          |
| Lemoyne Water                  | Y                        | 3/14/2024             | N/A                      | Phone  | General Information | Stated no damage  | N             | N/A          |
| Saraland Water and Sewer       | Y                        | 3/14/2024             | 3/22/2024                | Phone  | General Information | Left multiple messages, no response                             | N             | N/A          |
| Bayou La Batre Utilities Board | Y                        | 3/14/2024             | 3/25/2024                | Phone  | Dan McCrory         | Follow up needed  | N             | N/A          |
| DCNR                           | Y                        | 3/28/2024             | N/A                      | Email  | Will Underwood      | Follow ups provided   | Y             | 4/11/2024    |
| County - ER Services           | Y                        | N/A                   | N/A                      | Phone  | Tina Sanchez        | Follow ups provided   | Y             | 4/22/2024    |
| County – Facilities            | Y                        | N/A                   | N/A                      | Phone  | Eric Linsley        | Follow up needed  | Y             | 4/29/2024    |
| County - Engineering           | Y                        | N/A                   | N/A                      | Phone  | Rhonda Gullede      | Follow up needed  | Y             | 4/30/2024    |

# **Appendix B: Public Engagement Questionnaires**

# Appendix C: HMGP Match Projects

| <b>Mobile County HMGP Project List</b> |              |                       |                       |                       |
|--|--------------|-----------------------|-----------------------|-----------------------|
| Municipality                           | Project Name | Total                 | 75% Federal Share     | 25% Local Share       |
| Mobile County                          | Safe Room    | \$4,101,601.00        | \$3,076,200.75        | \$1,025,400.25        |
| City of Citronelle                     | Safe Room    | \$650,000.00          | \$487,500.00          | \$162,500.00          |
| Mobile County Public Schools           | Generator    | \$160,000.00          | \$120,000.00          | \$40,000.00           |
| Saraland Water and Sewer               | Generator    | \$51,600.00           | \$38,700.00           | \$12,900.00           |
| <b>Total</b>                           |              | <b>\$4,963,201.00</b> | <b>\$3,722,400.75</b> | <b>\$1,240,800.25</b> |

# Appendix D: Non-Match Project List

| Municipality/<br>Organization | Project Name  | Project Type       | Estimated Cost |
|-------------------------------|---|--------------------|----------------|
| Mobile County                 | HMGP Match First Responder Safe Room  | Infrastructure     | 1,000,000      |
| MOWA                          | MOWA Health Clinic Permanent Generator  | Infrastructure     | \$110,000      |
| Town of Mount Vernon          | Town of Mt. Vernon Library Generator  | Infrastructure     | \$110,000      |
| City of Citronelle            | Woodland Drive Dam  | Infrastructure     | \$1,500,000    |
| Facilities Department         | Grand Bay Senior Center, Semmes Library, Wilmer Senior Center, Coastal Response Center Generators | Infrastructure     | \$650,000      |
| Facilities Department         | Dalphin Island Airport Generator  | Infrastructure     | \$75,000       |
| Facilities Department         | Public Shelters/POD - Camp 1 and Camp 3   | Infrastructure     | \$9,000,000    |
| County                        | Development of Affordable Housing   | Affordable Housing | \$4,500,000    |
| County                        | Buyout  | Affordable Housing | \$3,000,000    |
| County                        | Downpayment Assistance  | Affordable Housing | \$3,000,000    |
| Engineering Department        | Public Shelters- Camp 2 and other locations   | Infrastructure     | \$9,000,000    |
| County                        | Community Shelters (standalone)   | Infrastructure     | \$9,000,000    |
| County                        | Mobile Public Housing Authority (multiple facilities)   | Affordable Housing | \$244,168      |
| City of Chickasaw             | Mabella Restroom and Roof Repairs   | Infrastructure     | Unknown        |
| City of Prichard              | Public Housing Authority Repairs  | Affordable Housing | \$505,500      |
| City of Chickasaw             | Chickasaw Housing Authority Unit Improvements   | Affordable Housing | \$2,500,000    |
| City of Prichard              | Sweeney Lane Bridge Improvements  | Infrastructure     | \$900,000      |
| Engineering Department        | Bridge Improvements (Mason Ferry Rd)  | Infrastructure     | \$900,000      |

| Municipality/<br>Organization | Project Name  | Project Type       | Estimated Cost |
|-------------------------------|---|--------------------|----------------|
| MOWA                          | Storm Shelter   | Infrastructure     | \$6,000,000    |
| Town of Mount Vernon          | Shelters  | Infrastructure     | \$6,000,000    |
| Facilities Department         | Wilmer school property                                | Infrastructure     | \$15,000,000   |
| City of Prichard              | Comprehensive Drainage Study                          | Planning           | \$400,000      |
| City of Chickasaw             | Levee repair  | Infrastructure     | Unknown        |
| City of Chickasaw             | Road Repair - Gravel and Dirt                         | Infrastructure     | Unknown        |
| MOWA                          | MOWA Affordable Housing Expansion                     | Affordable Housing | Unknown        |
| Town of Mount Vernon          | Drainage Improvements                                 | Infrastructure     | Unknown        |
| Town of Mount Vernon          | Town Street Repairs                                   | Infrastructure     | Unknown        |
| Town of Dauphin Island        | Drainage Improvements                                 | Infrastructure     | Unknown        |
| Engineering Department        | Evacuation Roads Improvements (multiple locations)    | Infrastructure     | Unknown        |
| City of Chickasaw             | City Road Repairs and Improvements                    | Infrastructure     | Unknown        |
| County                        | Living Shoreline                                      | Infrastructure     | Unknown        |
| DCNR                          | Stormwater Management Section 390 5 Year Project List | Infrastructure     | Unknown        |
| Town of Dauphin Island        | Elevation Projects                                    | Infrastructure     | Unknown        |
| Town of Dauphin Island        | Acquisition of Wet Lots                               | Infrastructure     | Unknown        |
| Town of Dauphin Island        | Community Rating System                               | Infrastructure     | Unknown        |
| Town of Dauphin Island        | Home Buyouts  | Affordable Housing | Unknown        |
| Facilities Department         | Hardening of public buildings throughout the County   | Infrastructure     | Unknown        |
| Engineering Department        | Hardening of public building - John Archer Center     | Infrastructure     | Unknown        |
| City of Chickasaw             | Utility Board Roof                                    | Infrastructure     | Unknown        |
| City of Chickasaw             | Civic Center Improvements                             | Infrastructure     | Unknown        |
| City of Prichard              | Healthcare Facility Roof Repairs                      | Infrastructure     | Unknown        |
| City of Prichard              | City Community Center Repairs (2 locations)           | Infrastructure     | Unknown        |
| City of Prichard              | Patricia and MLK Improvements                         | Infrastructure     | Unknown        |
| City of Prichard              | Head Start Center Repairs                             | Infrastructure     | Unknown        |
| City of Prichard              | Alabama Village Buyout                                | Infrastructure     | Unknown        |



| <b>Municipality/<br/>Organization</b> | <b>Project Name</b>                               | <b>Project Type</b> | <b>Estimated Cost</b> |
|---------------------------------------|---|---------------------|-----------------------|
| MOWA                                  | Museum Repairs and Improvements                   | Infrastructure      | Unknown               |
| MOWA                                  | Utility Improvements                              | Infrastructure      | Unknown               |
| Town of Mount Vernon                  | Senior Center                                     | Infrastructure      | Unknown               |
| County                                | 10114 Wulff Road Buyout                           | Infrastructure      | Unknown               |
| Town of Mount Vernon                  | FEMA Public Assistance/Hazard Mitigation Projects | Infrastructure      | Unknown               |
| Town of Mount Vernon                  | Senior Housing Facility Generator                 | Infrastructure      | Unknown               |
| DCNR                                  | Stormwater Yearly RFP - due April 20th            | Infrastructure      | Unknown               |
| County                                | Stream Replenishment                              | Infrastructure      | Unknown               |
| County                                | Storm Shelters                                    | Infrastructure      | Unknown               |
| County                                | First Responder Shelter (standalone)              | Infrastructure      | Unknown               |
| City of Chickasaw                     | Lagoon Treatment Work                             | Infrastructure      | Unknown               |

# Appendix E: Summary of Public Comments

| Comment Date | Comment Received From | Summary of Comment Received |
|--------------|-----------------------|-----------------------------|
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |
|              |                       |                             |

