

City of Philadelphia
Community Development Block Grant-Disaster
Recovery (CDBG-DR) Public Action Plan
Amendment #2 (Substantial)
Remnants of Hurricane Ida | 4618-DR



Submitted to HUD: 0/0/00
Effective Date: **TBD**



Table of Contents

Summary of Action Plan Amendment #2	4
Section 1. Executive Summary	5
1.1 Overview	5
1.2 Disaster-Specific Overview	6
1.3 Summary	14
1.4 Unmet Need and Proposed Allocation	15
Section 2. Unmet Needs Assessment.....	16
2.1 Housing Unmet Need	17
2.2 Infrastructure Unmet Need	39
2.3 Economic Revitalization Unmet Need	44
2.4 Unmet Needs Summary	45
2.5 Mitigation Needs Assessment.....	46
Section 3. General Requirements	66
3.1 Citizen Participation.....	66
3.2 Public Website	78
3.3 Amendments.....	79
3.4 Displacement of Persons and Other Entities.....	80
3.5 Protection of People and Property.....	81
Section 4. Grantee Proposed Use of Funds	90
4.1 Overview	90
4.2 Program Budget.....	91
4.3 Distribution of Funds.....	92
4.4 Program Income	92
4.5 Resale or Recapture.....	92
4.6 Program Details	93
Section 5. Appendix	112
5.1 Certifications	112
5.2 Waivers (If Applicable)	114

5.3	Summary and Response of Public Comments	114
5.4	Data Sources/Methodologies.....	135
5.5	Important Definitions and Terms.....	137
5.6	Standard Form 424.....	137

SUMMARY OF ACTION PLAN AMENDMENT #2

Action Plan Amendment #2 addresses the following:

Section-Title	Description of Change	Page #
4.6.1-Disaster Recovery and Resilience Program	<p>Program name change; remove ineligibility of homes located in the Special Flood Hazard Area (SFHA); policy updates</p> <p>Reword the eligibility criteria related to mortgages, to allow for nuanced experiences.</p> <p>Clarify that an outreach priority is to reach households over 62 and those with disabilities, not that these two groups are prioritized for program enrollment.</p> <p>Add program enrollment prioritization for households with code violations.</p> <p>Under "Method of Distribution", add details about the award structure. Assistance in form of a grant to fund repairs.</p> <p>Change the complaints resolution timeline to reflect PHDC/DRRP staff capacity.</p>	92-96
Section 4.6.3-Economic Revitalization	<p>Program name change</p> <p>Decreased minimum award amount from \$50,000 to \$20,000.</p>	99-101

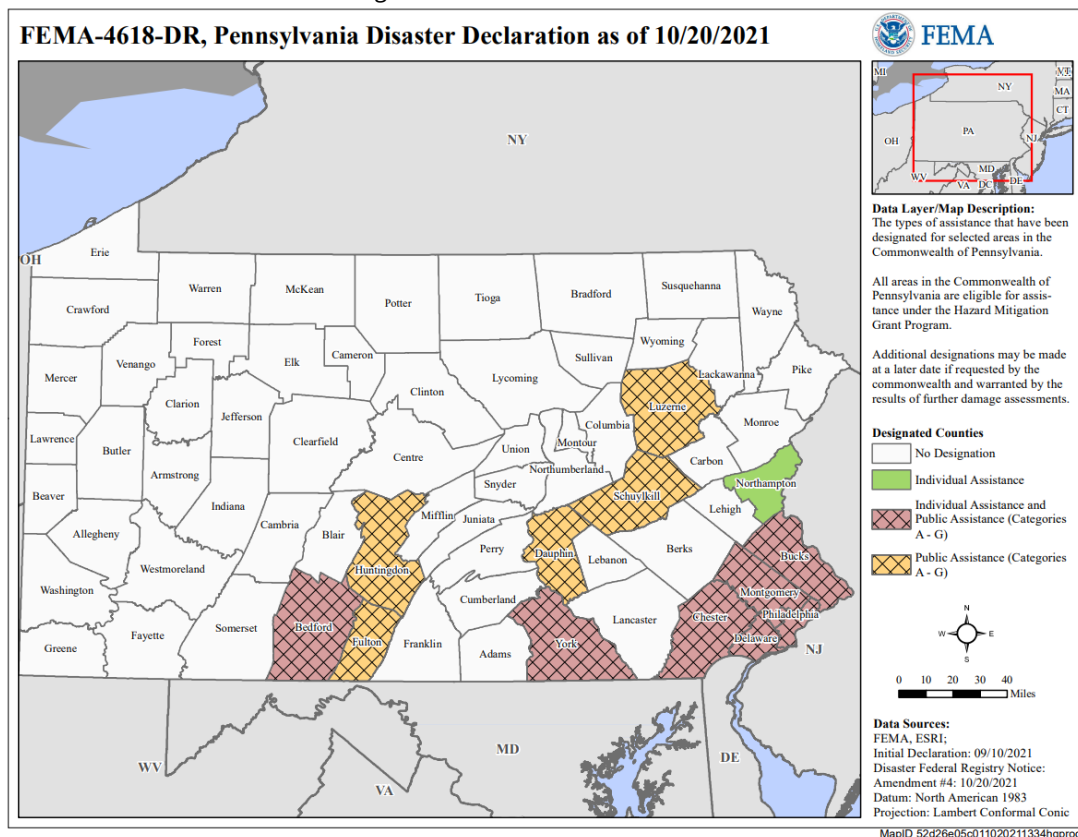
SECTION 1. EXECUTIVE SUMMARY

1.1 Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the City of Philadelphia will receive \$163,204,000 in funding to support long-term recovery efforts following the Remnants of Hurricane Ida (Hurricane Ida) and Disaster Declaration FEMA-4618-DR. Community Development Block Grant - Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in Philadelphia.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$163,204,000 in CDBG-DR funds to the *City of Philadelphia* in response to Hurricane Ida, through the publication of the [Federal Register, Vol. 87, No. 100, May 24, 2022](#) and [Federal Register, Vol. 88, No. 11, January 23, 2023](#). This allocation was made available through the [Disaster Relief Supplemental Appropriations Act, 2022 \(Public Law 117-43\)](#) and the [Continuing Appropriations Act, 2023 \(Public Law 117-180\)](#).

Figure 1: FEMA Disaster Declaration



1.2 Disaster-Specific Overview

In September 2021, Hurricane Ida, which was later downgraded to a tropical storm, reached southeastern Pennsylvania. The Philadelphia area experienced heavy rains, high winds, and severe flooding. A total of 3.97 to 5.69 inches of rain fell in certain parts of the city within a 12-hour period. Of the six waterways in Philadelphia with water gages, both the Schuylkill River and Pennypack Creek significantly exceeded major flood stage with the Schuylkill River reaching 16.35 feet and the Pennypack Creek reaching 14.57 feet. Impacts caused numerous emergency evacuations and temporary sheltering and necessitated the closure of many local roads and major roadways. This excessive rainfall overwhelmed the local stormwater management systems and waterways, leading to widespread flooding across the region. For specific flood height information for each of the monitored waterways, please refer to the table provided below.

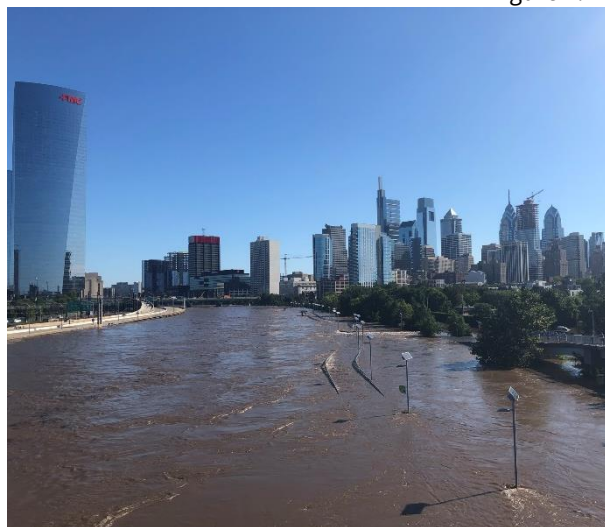
Table 1: Water Levels

Body of water	Highest level during Ida	Major flood stage
Schuylkill River	16.35	15.5
Cobb's Creek	2.52	X
Wissahickon Creek	9.34	X
Delaware River	9.72	10.2
Pennypack Creek	14.57	11
Frankford Creek	8.97	10

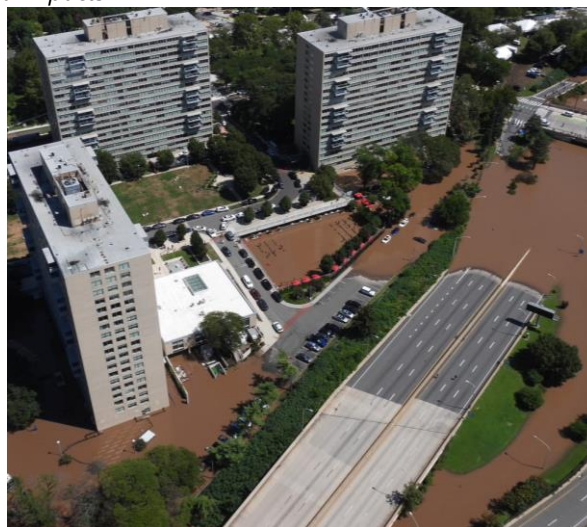
Overall, Hurricane Ida's arrival in southeastern Pennsylvania, particularly in Philadelphia, resulted in significant damage due to heavy rains, strong winds, and severe flooding. The rainfall rates observed were historically high, causing the inundation of stormwater management systems and waterways. In the table provided above, it is evident that the Schuylkill River and Pennypack Creek significantly exceeded major flood stage levels. The storm brought heavy rainfall across the region, resulting in extensive flooding, particularly along waterways, which experienced the most significant impacts during and immediately after the storm. Even after the peak rainfall, flooding persisted as water drained into local waterways, and the swelling rivers forced stormwater back through the stormwater systems.

While Hurricane Ida affected the entire city of Philadelphia, certain sections experienced the most significant impact. These areas include Manayunk, East Falls, South and Southwest Philadelphia, West Philadelphia, North Philadelphia, Center City, and Northwest Philadelphia. One of the major consequences of the extensive flooding was the complete inundation of I-676, a significant transportation corridor that traverses Center City, connecting the two largest interstate roads in the area, namely I-95 on the eastern edge of the city and I-76 along the eastern edge of Center City. Moreover, dozens of roads across nearly a dozen police districts were closed, causing disruptions in local transportation. Some of the major roads that were closed included Lincoln Drive, Cobbs Creek Parkway, Christopher Columbus Boulevard, Flat Rock Road, Ridge Avenue, Kelly Drive, and Main Street.

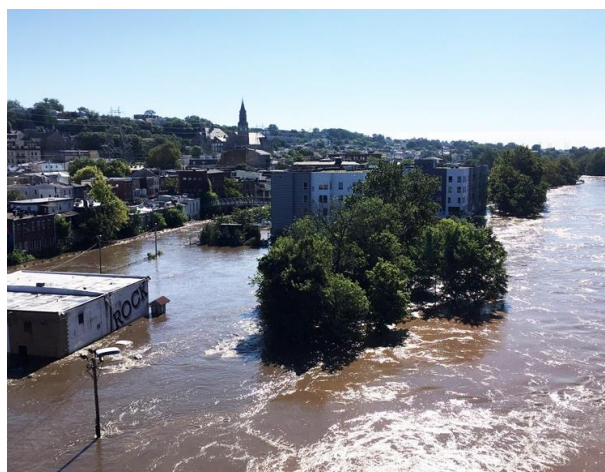
Figure 2: Flood Impacts



Schuylkill River looking north



Schuylkill River Flooding



Aerial footage from Manayunk



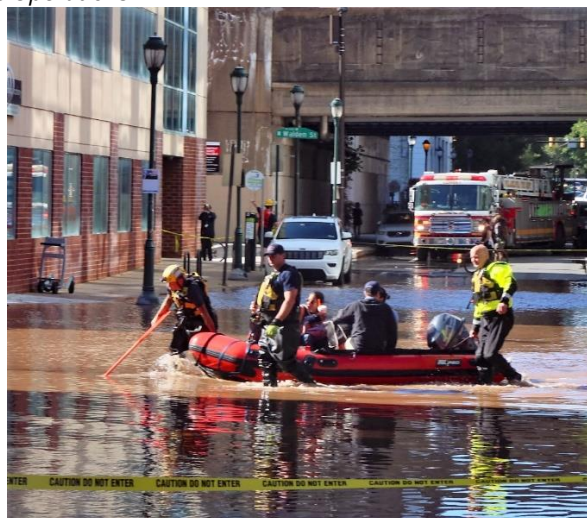
River Road in Northwest Philadelphia

According to the Philadelphia Office of Emergency Management (OEM), the flooding resulted in the evacuation of over 1,100 residents and numerous water rescues. The Philadelphia Fire Department's (PFD) boat rescue team responded to over 50 calls and conducted 29 transports of residents. The Federal Emergency Management Agency's (FEMA) Preliminary Damage Assessment Report, covering all Pennsylvania counties identified in the Presidential declaration of a major disaster (Bucks, Chester, Delaware, Montgomery, Philadelphia, and York Counties), indicated that approximately 1,200 residences were impacted by flooding from the storm, with 81 being destroyed and over 500 suffering major damage. In Philadelphia, nearly 200 structures were assessed during the joint preliminary damage assessment with FEMA. To accommodate displaced residents, the City opened two shelters at local high schools: West Philadelphia High School and Roxborough High School. In total, approximately 55,000 households, including 20,000 homeowner households and 35,000 renter households, applied to FEMA's Individual Assistance (IA) program. Out of the total applications, nearly 11,000 properties had FEMA-verified real property loss.

Figure 3: Rescue Operations



National Guard in Center City



Philadelphia Fire Department conducting rescues

The storm event also impacted public facilities and utilities. For instance, the Belmont Raw Water Pump Station, which serves a substantial portion of Philadelphia, lost power. Additionally, other Philadelphia Water Department (PWD) facilities, such as the Queen Lane Water Treatment Plant, 42nd Street Pumping Station, and Lardner's Point Fresh Water Pumping Station, were indirectly affected. The failure of the Belmont Pump Station strained the City's other facilities and highlighted the need to increase capacity and fortify existing infrastructure to manage major storms like Hurricane Ida. Utility infrastructure and key healthcare facilities were also impacted, and multiple fire stations required the relocation of personnel and equipment.

The severe flooding, particularly in densely urbanized areas, adversely impacted local businesses. Businesses located near waterways and along flooded transportation corridors suffered extensive damage. The Manayunk neighborhood, a densely developed commercial and residential riverfront area along the Schuylkill River in northwestern Philadelphia, experienced some of the most severe impacts on local businesses. The vibrant commercial corridor along Main Street in Manayunk, which runs parallel to the Schuylkill River, was submerged under several feet of floodwater. Offices in Manayunk did not have electricity, internet, gas, and telephone access as a result of the storm. According to the City's Individual Assistance Impact Statement for Tropical Storm Ida, approximately 22% of commercial spaces in the Manayunk neighborhood suffered severe damage and over half of the gross leasable area suffered severe damage. Data from the U.S. Small Business Administration's (SBA) Office of Disaster Assistance indicates over \$12 million in verified losses occurring in Philadelphia tied to businesses.

1.2.1 Disaster Impacts and Funding Needs

Based on the City's initial analysis, City unmet disaster recovery needs can be grouped into five main categories:

- Water, Sewer and Stormwater Infrastructure Damage and Vulnerability

- Public Infrastructure and Critical Facility Resiliency
- High Housing Cost Burden Among Ida Impacted Residents
- Local Businesses Impacts
- Recovery and Resiliency Planning

Water, Sewer and Stormwater Infrastructure Damage and Vulnerability

Hurricane Ida's impacts on Philadelphia revealed a pressing need for the restoration and improvement of the city's aging water, sewer, and stormwater infrastructure. The vulnerabilities of Philadelphia's infrastructure were exposed during the storm, as pump stations and critical facilities nearly failed to cope with the magnitude of the event. The system was pushed to its limits, and if additional infrastructure failed, the situation could have escalated into a crisis.

Severe storms like Hurricane Ida will continue to have devastating effects on the water system, causing disruptions for residents ranging from a few hours to several weeks. It is evident that the existing infrastructure is ill-equipped to handle such events, and there is a significant need to enhance the resiliency and reliability of Philadelphia's water, sewer, and stormwater systems. For more specific details regarding the impacts on water, sewer, and stormwater infrastructure, please refer to Section 2.2, titled "Infrastructure Unmet Need," which provides comprehensive information on the deficiencies and challenges faced by the city's infrastructure.

Public Infrastructure and Critical Facility Resiliency

Hurricane Ida significantly impacted on Philadelphia's aging infrastructure, resulting in disruptions to transportation and the closure of important parks and recreational assets. The storm's effects were particularly felt along trails situated near waterways, such as the Manayunk Canal Tow Path, which suffered extensive damage and required closure for repairs. Several other parks and recreation sites were also damaged, including the Schuylkill River Trail, Pennypack Park Trail, and Wissahickon Valley Park.

Efforts were made to address the aftermath of the storm, including the removal of debris along riverbanks. Debris included logs, vehicles, and construction equipment. Plans were also put in place to restore heavily damaged streambanks. Special projects were undertaken to address specific issues caused by the storm, such as replacing a safety cable, repairing an outdoor amphitheater at Dell Music Center, and addressing flood damage at various playgrounds. Additionally, crews worked to clear and recycle dozens of downed trees. For more detailed information regarding the impact on infrastructure and the unmet needs associated with it, please refer to Section 2.2 titled "Infrastructure Unmet Need." This section provides more information on the specific challenges and requirements for restoring and improving the affected infrastructure.

Figure 4: Impacted Trails and Parks Infrastructure



High Housing Cost Burden Among Ida Impacted Residents

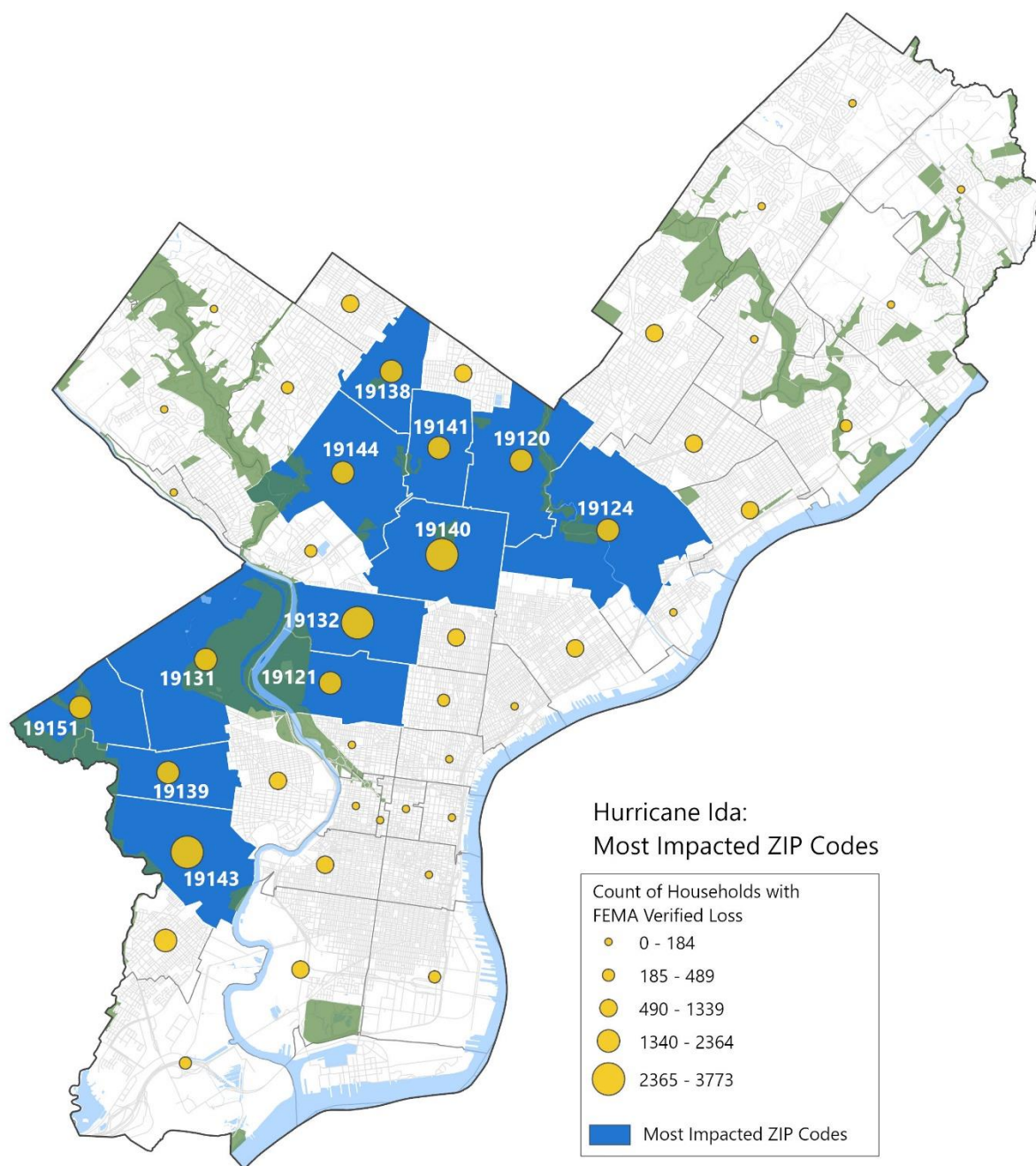
Hurricane Ida significantly impacted aging residential homes and buildings, particularly rowhomes or attached one-unit structures. These properties were severely affected throughout the city, with a concentration of damage in specific zip codes. Many of these areas are lower-income communities with a high percentage of at-risk populations. Targeted outreach efforts conducted by Pennsylvania and Southeastern Pennsylvania Voluntary Organizations Active in Disaster (PAVOAD) have identified substantial unmet needs among homeowners and renters in these areas, primarily residing in single-family homes located in dense settings like Strawberry Mansion (zip code 19132).

According to FEMA data, Strawberry Mansion had the highest number of Individual Assistance registrations and the highest concentration of repair and rental assistance awarded in the aftermath of Hurricane Ida. Damage assessments conducted by PAVOAD indicate that these homes continue to experience a combination of compromised exterior envelopes, including roofs, exterior walls (mostly masonry), windows, and doors, as well as various interior needs. It is important to note that many of these homes are aging and deteriorating buildings with deferred maintenance needs, which were further exacerbated by Hurricane Ida. This situation likely applies to other homes impacted by the storm across the city, especially in zip codes with higher rates of FEMA IA.

Preserving this crucial segment of affordable housing, particularly older row homes, is a top priority for the City, as it constitutes a significant portion of Philadelphia's housing stock,

accounting for nearly 60% of all residential units. Additionally, these properties contribute significantly to the city's naturally occurring affordable housing stock. The City recognizes the importance of addressing the unmet housing needs resulting from Hurricane Ida, and further details can be found in Section 3.1 titled "Housing Unmet Need," which provides comprehensive information on the specific challenges and requirements for meeting these housing needs.

Figure 5: Ida Impact By Zip Codes



Local Businesses

Hurricane Ida inflicted significant damage and disruption on businesses within the affected areas. The severity of the impact varied depending on the location, nature of the business, and the intensity of the storm. The following are some of the key effects experienced by businesses in Philadelphia:

- **Physical damage:** The heavy rainfall and flooding caused by Hurricane Ida resulted in substantial damage to buildings, infrastructure, and equipment. Many businesses faced structural damage, water intrusion, and power outages, leading to temporary or permanent closures.
- **Supply chain disruptions:** The storm disrupted transportation systems, including highways, railways, and ports, making it challenging for businesses to receive supplies and transport their products. This created delays and shortages across various industries, such as retail, manufacturing, and construction.
- **Loss of income and unpaid wages:** The closures and disruptions caused businesses to experience a loss of income during and after the storm. This had a particularly significant impact on small businesses that may have lacked sufficient financial reserves or insurance coverage. Additionally, reduced business hours resulted in financial hardships for employees, particularly those in low-wage or hourly positions.

The overall impact of Hurricane Ida on businesses necessitated substantial time and resources for recovery. Small businesses, in particular, faced significant challenges in rebuilding and resuming operations. The storm's effects on businesses and the unmet needs associated with economic revitalization are further detailed in Section 3.3 titled "Economic Revitalization Unmet Need." Efforts to support affected businesses and foster their recovery remain crucial in restoring the local economy and ensuring the well-being of both business owners and employees.

Recovery and Resiliency Planning

The aftermath of Hurricane Ida revealed needs tied to the City's preparedness and response to extreme weather events. One of these needs is studying potential resiliency and mitigation efforts to minimize the impact of future hurricanes and storm events. Another area for improvement is planning better evacuation procedures for occupants of subgrade spaces in the event of flash floods. It is also important to identify the location of vulnerable structures, especially residential structures, and explore solutions to better protect them from floods, storms, and other natural hazards. In addition, there is a need to enhance methods for forecasting, monitoring, tracking, and evaluating the impacts of extreme weather events. Addressing these areas of improvement can help the City and its partners better prepare for future extreme weather events and build a more resilient and sustainable future.

Figure 6: Manayunk after Ida



1.3 Summary

To fulfill the requirements of this allocation, the City submitted an Action Plan to HUD in August 2023 that identifies its unmet recovery and mitigation needs. This Action Plan, which was approved by HUD in October 2023, outlines proposed uses of CDBG-DR funds and eligible activities available to assist impacted areas in meeting unmet housing, infrastructure, planning, and economic revitalization needs resulting from Hurricane Ida's impacts. Specifically, this plan aims to promote and ensure access to housing for low-to-moderate income residents and strengthen neighborhoods impacted by the disaster by investing in housing, infrastructure, public facilities, along with public services and planning. In addition, the Action Plan describes how CDBG-DR funds will be targeted toward and meet the needs of low- to moderate-income communities.

The City has been engaging communities and gathering data for the unmet needs assessment since 2021. To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, the City initiated meetings with federal stakeholders, various state and local officials, residents, and non-profit organizations. These meetings have been beneficial in gathering information about the impacts of the storm, existing challenges to address, and solutions. In addition, the City continues to work with local entities and non-profit organizations to collect information.

The City offered residents reasonable notice and opportunity to comment on the Action Plan and will continue to do so for future substantial amendments. The City convened two public hearings on the draft CDBG-DR Action Plan after the Action Plan was posted on the City's disaster recovery website for public comment and before submission to HUD. Notice of all hearings follow the guidelines established in the City's CDBG-DR. The City published the draft CDBG-DR Action Plan in a manner that afforded citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan was available on the City's CDBG-DR website throughout the 30-day comment period.

The City's Office of the Director of Finance (Finance) and Division of Housing and Community Development (DHCD) will jointly oversee administration of the CDBG-DR program. While Finance and DHCD are the primary entities administering the grant, implementation will require close coordination across numerous City agencies including but not limited to the Managing Director's Office (MDO); Mayor's Office; Philadelphia Water Department (PWD); Commerce Department, Philadelphia Parks and Recreation (PPR); the Office of Transportation and Infrastructure Systems (OTIS); Streets Department; and the Department of Public Property. The City will continue citizen engagement efforts throughout the duration of this grant and will adjust as necessary.

1.4 Unmet Need and Proposed Allocation

The City used the best available data sources to analyze the demographic characteristics of the areas of impact; the losses sustained; and the available resources in response to housing, infrastructure, and economic revitalization. The overall unmet need for the remnants of Hurricane Ida totals more than \$1.2 billion, with housing and infrastructure showing the greatest need at 61% and 38% respectively. The City utilized publicly available FEMA IA data, publicly available SBA data, and internal FEMA Public Assistance (FEMA PA) data, along with local data sources.¹ The City will continue working with local organizations to monitor unmet needs. CDBG-DR funds will be used to address unmet housing and infrastructure needs primarily. Housing and infrastructure investment will provide the most benefit and long-term recovery solutions to the impacted communities. CDBG-DR funding will be directed to the communities most impacted and with the greatest unmet needs. All CDBG-DR funded activities will be implemented in the HUD Most Impacted and Distressed (MID) areas.

Table 2: Unmet Need and Allocation

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount*	% of Program Allocation
Housing	\$810,140,419	61%	\$52,138,100	32%
Economic Revitalization	\$16,087,000	1%	\$5,000,000	3%
Infrastructure	\$474,553,000	38%	\$52,138,100	32%
Mitigation	Not applicable	Not applicable	\$21,287,000	13%
Public Services	Not applicable	Not applicable	\$3,000,000	2%
Administration	Not applicable	Not applicable	\$8,160,200	5%
Planning	Not applicable	Not applicable	\$21,480,600	13%
Total	\$1,300,780,419	100%	\$163,204,000	100%

¹ The City's Action Plan uses publicly available data offered through FEMA's OpenFEMA platform. The City also received data through HUD's Data Sharing Agreement with FEMA on June 16, 2023. Based on a comparative analysis of data collected from FEMA's publicly available datasets and the data provided through the FEMA-HUD Data Sharing Agreement, there is no substantial difference between the two datasets.

SECTION 2. UNMET NEEDS ASSESSMENT

The following section describes the impact of Hurricane Ida and provides a framework for recovery and mitigation projects using CDBG-DR funds. CDBG-DR funding is designed to address needs that remain after all other assistance has been exhausted. Accordingly, grantees must conduct a needs assessment to determine where unmet needs exist. This HUD-mandated analysis serves as the basis by which the City must allocate its CDBG-DR grant.

HUD requires the assessment to consider four main categories of need - housing, infrastructure, economic recovery, and mitigation. Grantees must account for assistance available from various sources including, but not limited to, federal and state resources (e.g., FEMA and the Small Business Administration), local funds such as City tax levy or City capital funds, and private sources such as insurance proceeds. The Unmet Needs Assessment follows HUD's prescribed format and organizational structure.

The City began assessing Ida's impact immediately as the storm hit and the effort continues to this day. This section will be updated as additional data becomes available, particularly if this information reveals unmet needs that had not previously been considered. Any significant changes to the unmet needs section (i.e., changes that would affect eligibility, intended program beneficiaries, or how funds will be distributed) will result in a substantial amendment.

To prepare this assessment, the City consulted with and drew data from entities including but not limited to HUD, FEMA, SBA, Commonwealth agencies, various City departments, Philadelphia Public Housing Authority (PHA), Continuum of Care partners, and community-based organizations as well as resident outreach and feedback. The Unmet Needs Assessment presents an analysis of data to reflect the damage caused by Hurricane Ida in Philadelphia and to demonstrate the ongoing unmet recovery needs of impacted residents impacted. Ultimately, no one data source accurately captures the population impacted by Hurricane Ida. This Action Plan and unmet needs analysis captures a point in time and reflects the best available data at the time of its publication. In addition to using the methodology outlined by HUD to calculate housing unmet needs, other data and information is also used to validate the FEMA IA data and to get a more complete assessment of impacts and unmet needs.

HUD requires funds to be used for costs related to unmet needs in the "most impacted and distressed" (MID) areas resulting from qualifying disasters. The City is required to spend at least 80% of all Ida CDBG-DR funds to benefit the HUD-identified MID areas. HUD has designated the entire City of Philadelphia as a MID area. The City will spend 100% of the CDBG-DR funds in the City.

2.1 Housing Unmet Need

The following section describes the impact of Hurricane Ida on Philadelphia's housing stock and its residents to inform a framework for recovery and mitigation projects using CDBG-DR funds.

2.1.1 Disaster Damage and Impacts

2.1.1.1 Pre-disaster housing conditions

Housing affordability is a persistent challenge in Philadelphia that predates Hurricane Ida and is exacerbated by many factors, including housing cost burden, aging housing conditions, and recent market conditions tied to the pandemic.

Housing Cost Burden

Housing cost burden is the most prevalent housing problem facing Philadelphia renters and owners. A commonly accepted threshold for affordable housing costs at the household level is 30% of a household's income. Accordingly, a household is considered cost burdened if it pays more than 30% of its income on housing. Households paying more than 50% are considered severely cost burdened. These thresholds apply to both homeowners and renters. The 2021 American Community Survey 5-Year Estimates indicate that of Philadelphia households, 39% are cost burdened, with renters accounting for 52% of all cost burdened households. Among households reporting one or more housing problems – lack of complete plumbing or kitchen facilities, overcrowding, housing cost burden, and zero/negative income – housing cost burden is far and away the most common issue households face.

Table 3: Housing Problems (Households with at least one listed need)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Number of Households										
Substandard Housing - Lacking complete plumbing or kitchen facilities	2,075	630	295	240	3,240	885	495	340	220	1,940
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,610	880	630	295	3,415	100	150	105	135	490
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	2,275	1,375	1,140	580	5,370	555	735	880	380	2,550
Housing cost burden greater than 50% of income (and none of the above problems)	60,680	11,885	2,510	300	75,375	27,125	7,955	3,190	650	38,920
Housing cost burden greater than 30% of income (and none of the above problems)	10,150	22,145	15,375	3,065	50,735	11,190	11,805	12,105	3,840	38,940
Zero/negative Income (and none of the above problems)	19,865	0	0	0	19,865	6,540	0	0	0	6,540
Data Source: 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)										

Housing cost burdens are experienced disproportionately across Philadelphia. The City's [2022 Assessment of Fair Housing](#) (AFH) found that rates of cost burden were nearly twice as high in predominantly Black and predominantly Hispanic communities than in predominantly White communities. Seniors, low-income families, persons with disabilities and households with young children experiencing cost burden are also particularly vulnerable.

Aging Housing Conditions

Philadelphia's housing stock primarily consists of rowhomes which are typically single-family attached structures that are decades old. Prior to Hurricane Ida, Philadelphia was already suffering from aging and deteriorating housing. The vast majority of homes in Philadelphia – about 88% - were built prior to 1980. Most rowhomes are located in older and historic neighborhoods. Areas of the city that have not experienced growth and reinvestment as part of the pre- and post-recession real estate boom often deal with issues related to aging and deteriorating buildings and infrastructure. Vacant land and buildings are common and pervasive in these areas. With minimal options for affordable housing, low-income families often reside in dated units with deferred maintenance needs, such as un-remediated paint installed before national lead regulations were put in place.

Table 4: Housing Tenure by Property Type

Property Type	Owner-Occupied		Renter-Occupied		Total	
	#	%	#	%	#	%
1, detached	53,935	15.50%	14,137	4.50%	68,072	10.30%
1, attached	267,448	76.60%	105,917	33.90%	373,365	56.50%
2 apartments	6,509	1.90%	41,875	13.40%	48,384	7.30%
3 or 4 apartments	4,089	1.20%	39,169	12.60%	43,258	6.50%
5 to 9 apartments	2,454	0.70%	16,502	5.30%	18,956	2.90%
10 or more apartments	13,772	3.90%	92,528	29.70%	106,300	16.10%
Mobile home or other type of housing	728	0.20%	1,858	0.60%	2,586	0.40%
Total	348,935	100%	311,986	100%	660,921	100%

Source: U.S. Census Bureau, 2021 ACS 5-Year Estimates

Table 5: Age of Housing Units

Year Unit Built	# of Units	%
1980 or later	100,702	15%
1940-1979	309,436	47%
Before 1940	250,783	38%
Total	660,921	100%

Source: U.S. Census Bureau, 2021 ACS 5-Year Estimates

While Philadelphia's aging housing stock is closely linked to poor housing conditions, the prevalence of rowhomes in Philadelphia contributes significantly to the City's Naturally Occurring Affordable Housing (NOAH) stock. NOAH stock typically represents unsubsidized, privately-owned housing privately that is affordable to households making between 30-80% (and potentially up to 120%) of the area median income (AMI). The City's latest Consolidated Plan estimates that 97,000 rental units across 76,000 properties are considered naturally affordable, and the majority are owned by small landlords. However, 40% of these units are considered vulnerable due to various factors, including poor condition, highly subject to displacement, or located in a strong market area, which is likely to increase upward pressure on rental rates.

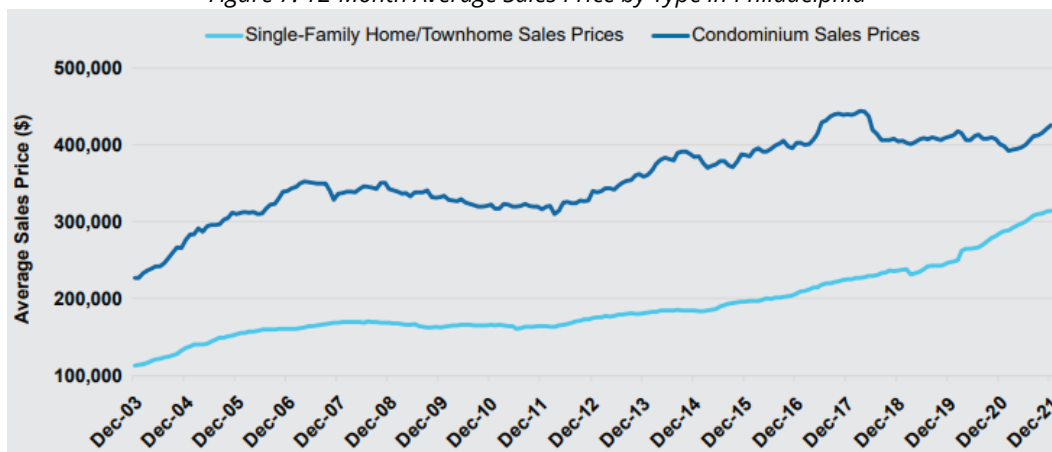
Recent Market Conditions

Over the last ten years, Philadelphia has seen high levels of construction and renovation. While this market activity represents important progress, it does not address local housing affordability challenges. Most of the new units developed in recent years have entered at the high end of the market. At the same time, poverty and homelessness persist and the number of existing units at the low end of the market has fallen. The age of housing and lack of income to maintain homes threaten to cause vacancy. In many ways Philadelphia is an affordable city, yet appreciating costs threaten to displace long-time residents in some neighborhoods. Although the new construction includes high-rise and low-rise condominiums and apartments, Philadelphia remains a rowhouse city and a majority of housing units are owner-occupied.

The growth in the housing market is putting pressure on affordable housing stock, encouraging property owners to increase rents or convert affordable units to market-rate units. The 58,600 publicly supported affordable units do not meet the demand, and the affordability periods for many of those units are scheduled to expire in the next five years. At the same time, new market-rate and infill development is occurring in neighborhoods just outside or with easy connections to Center City. The infill development tends to be rowhouses while the larger scale developments are condominiums or apartments. Very little of this new housing is affordable.

According to HUD's latest [Comprehensive Housing Market for Philadelphia](#), housing and rental market conditions are unusually tight. Because of the strong increases in home sales, the average sales price of new and existing single-family homes and townhomes in the City increased at a rapid pace during the past 2 years, reaching an all-time high. During 2021, the average sales price of new and existing single-family homes and townhomes rose 10%, to \$314,600.

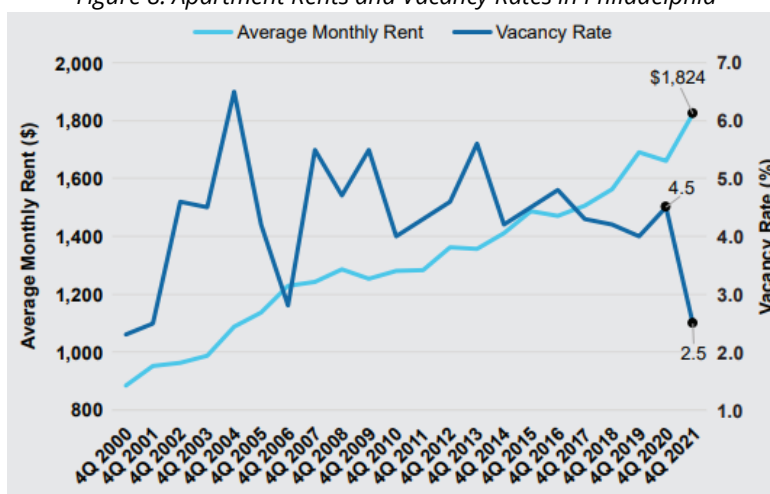
Figure 7: 12-Month Average Sales Price by Type in Philadelphia



Source: HUD Comprehensive Housing Market Analysis

Conditions in the rental market are also tight compared to conditions in 2010. During 2021, the apartment vacancy was 3%, down significantly from 5% during 2020. In response to declining vacancy rates throughout the submarket, the average apartment rent rose at the fastest pace in more than 15 years. During 2021, the average apartment rent in Philadelphia increased 10% compared to an average annual 3% rise from 2010 through 2020.

Figure 8: Apartment Rents and Vacancy Rates in Philadelphia



Source: HUD Comprehensive Housing Market Analysis

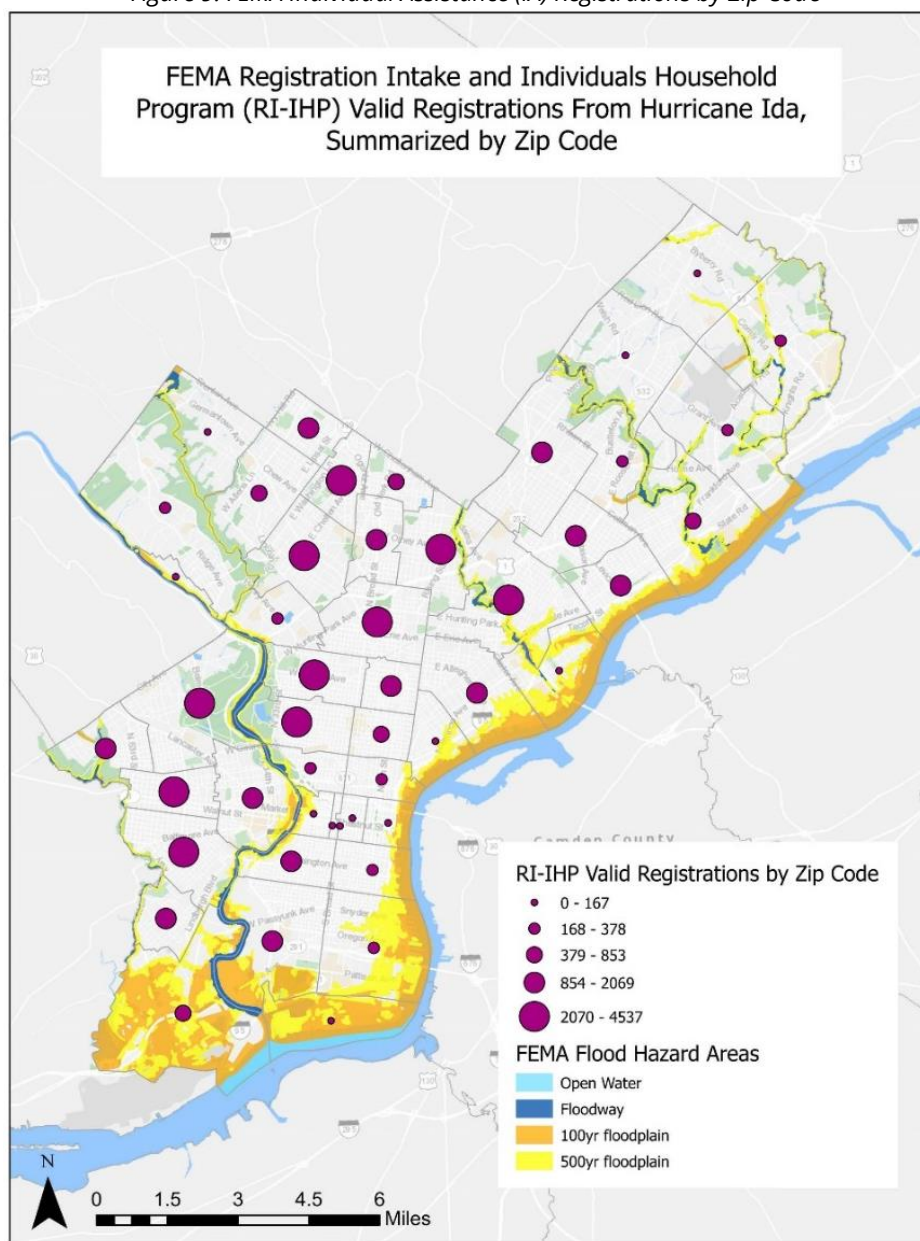
Pre-disaster housing conditions summary

Prior to Hurricane Ida, the City suffered from long-standing affordability challenges along with pandemic related impacts described above. These existing challenges, coupled with the impacts of Hurricane Ida, have greatly affected housing affordability in Philadelphia. Both renters and homeowners experience severe levels of cost-burden that are now worse following Ida. For Philadelphia to fully recover, further assistance is needed to reconstruct, replace, and build affordable housing that is stronger and more resilient against future disasters.

2.1.1.2 Disaster Impact on Housing

The remnants of Hurricane Ida brought heavy rains, high winds, and tornadoes to the Philadelphia region, resulting in widespread flooding across the city. Following the storm, the Commonwealth of Pennsylvania received a Presidential Disaster Declaration, enabling residents to seek direct aid from the FEMA through the FEMA IA program. Approximately 55,000 households, including 20,000 homeowner households and 35,000 renter households, applied for individual assistance from FEMA.

Figure 9: FEMA Individual Assistance (IA) Registrations by Zip Code



The impacts on housing were primarily caused by riverine and flash flooding, which overwhelmed existing stormwater systems, leading to water backing up and flowing through stormwater inlets into neighborhoods. Furthermore, many buildings in older parts of the city have flat roof styles, both detached and attached, in residential, mixed-use, and commercial structures. These roof designs were unable to drain water quickly enough, resulting in water infiltration in many structures. The severity of the storm's impact was due to a combination of factors previously mentioned, including record rainfall rates and amounts, dense development, and excessive impervious space in the urbanized setting, building design styles and age, pre-existing condition of structures, and undersized stormwater management systems.

To estimate the impact of Hurricane Ida on residential structures, the City used a modification factor. The process involved identifying the FEMA real property estimated loss amount. The city relied on FEMA data because it offers more impact information on the number of properties evaluated than any other source. The information collected was limited to "Real Property" impacted, as most federal funding, including CDBG-DR, aims to assist housing impacts directly rather than compensate for personal property damage. In this case, there were 10,892 properties with verified real property loss, totaling \$41,255,195 in estimated loss, averaging around \$3,787 per property, as summarized in Table 6: FEMA and SBA Recovery Assistance.

Table 6: FEMA and SBA Recovery Assistance

Total Estimated FEMA and SBA Real Property Assistance				
FVL Real Property # of Properties	FVL Real Property (\$)	FVL Real Property Repair Assistance Awarded (\$)	SBA Approved Real Estate Loan Amount (\$)	Total SBA and FEMA Assistance
10,892	\$41,255,195	\$33,620,376	\$7,699,520	\$41,319,896

Source: FEMA IA Data and SBA Disaster Loan Data

Please note, Table 6: FEMA and SBA Recovery Assistance may underestimate the total number of impacted properties for the following reasons. The City will continue monitoring data associated with impacted properties.

- 10,892 of the 54,709 (20%) properties collected by FEMA were recorded as having verified real property loss.
- 19,146 (35%) of the FEMA IA registrants were owner occupied while 35,435 (65%) were renter occupied. 120 properties had unknown tenure but made up less than 1% of total.
- 10,848 (99%) of FEMA IA registrants with FEMA verified real property loss were owner occupied while only 44 (0.6%) were renter occupied despite rental properties making up a significant majority (65%) of total FEMA IA registrations.

The table below demonstrates a significant disparity between FEMA IA registrations and FEMA Verified Loss (real property) based on the recorded FEMA IA data. It shows that 0.1% of rental properties claiming "home damage" were verified by FEMA as having real property loss, while over half (58%) of owner-occupied properties claiming "home damage" had verified real property loss.

Table 7: FEMA Home Damage Claims vs FVL by Housing Tenure

Tenure	Home Damage Claims	FVL (Real Property)	% of Claims with FVL
Renter	32,728	44	0.1%
Owner	18,686	10,848	58%

Source: FEMA IA data

The City of Philadelphia estimates that there was underreporting of the total number of rental units that experienced real property damage and believes that the 10,892 estimated properties with FEMA verified real property loss is likely higher.

To obtain a more accurate estimation of the disaster's impact per property, the City analyzed historic CDBG-DR housing recovery costs from various programs nationwide. The City examined 11 housing recovery programs from different parts of the United States, which included 170,337 awards to property owners to aid in recovery from damages caused by disasters to their residential structures. The total allocated CDBG-DR funds for these programs amounted to over \$13 billion. This results in an average per-property recovery cost of approximately \$78,173. Thus, on average, residential structures nationwide incurred damages of around \$78,173. This information is summarized in the table below.

Table 8: CDBG-DR National Per-Property Residential Damage Estimate

CDBG-DR Residential Recovery Programs Per-Property Recovery Estimate					
Grantee	Event	Grants Awarded to Homeowners	Total Amount of Award	Average CDBG DR award amount	Location where data was determined
Louisiana	2016 Floods	17,264	\$668,656,371	\$38,731	Louisiana Situation & Pipeline Report September 2022 #124
New York	Hurricane Sandy	12,759	\$2,255,083,398	\$176,745	State of NY webpage
Louisiana	Hurricane Katrina	130,053	\$9,030,446,583	\$69,437	Louisiana Situation & Pipeline Report September 2022
New Jersey	Superstorm Sandy	7,100	\$950,000,000	\$133,803	New Jersey QPR July 1, 2022 thru September 30 2022

Harris County	Hurricane Harvey	143	\$25,660,105	\$179,441	Harris County Pipeline Report #136
South Carolina	Hurricane Matthew	1,136	\$83,097,708	\$73,149	SC HUD QPR Thru June 30, 2022
North Carolina	Hurricane Matthew	758	\$137,496,510	\$181,394	NC HUD QPR Thru September 30 2022
West Virginia	2016 Floods	265	\$54,602,919	\$206,049	West Virginia HUD QPR June 2022 (Budgeted/Projected)
Chicago	2013 Floods	51	\$3,600,438	\$70,597	City of Chicago Oct. 2017 Project and expenditure report
Richland County, SC	2015 Hurricane Joaquin	145	\$10,161,000	\$70,076	Richland County Amended Action Plan
City of Galveston	2008 Hurricane Ike	663	\$96,881,815	\$146,126	Texas-GLP HUD QPR Thru December 31 2017
Totals		170,337	\$13,315,686,847	\$78,173	Average CDBG-DR Assistance Per Unit

Applying the average damage estimate/recovery cost of \$78,173 to the total number of properties with FEMA verified real property loss (10,892), results in total estimated damages of \$851,460,316. In order to find the unmet need any assistance provided by FEMA and SBA for real property repair/recovery (\$41,319,896.74) was subtracted. This resulted in a remaining housing unmet need for real property recovery at approximately \$810,140,419.

Table 9: Housing Estimated Unmet Need

Residential Real Property Unmet Need Estimate				
FVL Real Property # of Properties	Modified Per Structure Damage Estimate	Total Estimated Residential Impacts	Total SBA and FEMA Assistance	Total Unmet Need
10,892	\$78,173	\$851,460,316	\$41,319,896	\$810,140,419

2.1.2 Single Family v. Multi-Family Needs; Owner Occupied v. Tenant

Within this section, the City has included information and data tables that show the relative damages across housing types.

Affordable Rents, Income Limits, and Affordability Periods for CDBG-DR Funded Projects

For any projects or programs utilizing CDBG-DR funds, specific program guidelines will be established, which will outline income limits and minimum affordability periods.

HUD regularly publishes Fair Market Rents (FMRs) to represent the cost to rent a moderately

priced dwelling unit in the local housing market. Current FMRs for Philadelphia are accessed from the HUD user portal, Fair Market Rents (40th Percentile Rents), and will be revised when updated by HUD. Within each applicable program section of the Action Plan and within program guidelines, the City will define the applicable affordable rents, affordability periods, and number of units required to be maintained as affordable.

This Action Plan uses the HUD CDBG income limits to determine eligible CDBG-DR low- to moderate income (LMI) households. Households that are 80% of the area median income or below are eligible to rent CDBG-DR assisted rental properties. Income limits will be accessed from the HUD user portal, Income Limits, and will be updated annually following HUD's schedule. Program guidelines will detail specific income limits.

FEMA Individual Assistance (IA)

According to FEMA IA data, there were a total of 54,709 applicants, of which 50,682 received inspections. However, only 10,892 applicants (20% of the total) were found to have FEMA-verified real property loss. The data notably lacks representation of renter-occupied properties with verified real property loss, with only 44 out of over 30,000 inspected properties (less than 1%) falling into this category. Meanwhile, 57% of homeowner applicants were identified as having verified real property loss. On average, each property received approximately \$4,367 in IA assistance.

Table 10: FEMA IA Applicants by Occupancy & Verified Loss

Tenure	# Applicants	# Inspections	# with FVL (real property)	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Renter	35,435	33,369	44	3	\$150,702	\$3,425
Owner	19,146	17,185	10,848	9,444	\$41,104,492	\$3,789
Unknown	128	128	0	0	\$0.00	\$0.00
Total	54,709	50,682	10,892	9,448	\$41,255,195	\$3,787

Source: FEMA IA

The tables below provide information on the level of damage suffered by units identified by FEMA as having verified real property loss. FEMA-inspected owner units are categorized into five groups by HUD, including minor-low, minor-high, major-low, major-high, and severe damage, based on the extent of the damage and flooding. The table for owner-occupied units shows that out of the 10,848 units with FEMA-verified loss, 90% sustained minor to high damage, with only 14 units identified as having severe damage.

Table 11: 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
Philadelphia	5,164	4,577	1,009	84	14

Source: FEMA IA

Similar to the owner-occupied data, rental units with FEMA-verified real property loss primarily (91%) experienced minor to major damage, with none reported as severe.

Table 12: FEMA Real Property Damage Rental Units

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Philadelphia	22	18	3	1	0

Source: FEMA IA

The City of Philadelphia obtained U.S. SBA Home Disaster Loan data, which provides low-interest loans for residents in declared disaster areas to address damages or losses to personal or real property. The SBA data indicated a total of 84 SBA residential applicants, of which 55 had SBA-verified real estate loss, resulting in 48 approved real estate loans by SBA. Notably, there is a significant difference in per-property damage estimates between FEMA and SBA. FEMA's IA averaged approximately \$3,788 in verified loss per property, while SBA averaged \$352,288 in estimated real property loss per property. This difference suggests that FEMA's damage data may be underestimated, potentially necessitating adjustments to total damage estimates.

Table 13: SBA Total Home Disaster Loans

County	# of Verified Loss Real Estate	Verified Loss Real Estate (Total \$)	Approved Loan - Real Estate	Approved Loan - Real Estate (Total \$)	Unmet Need (\$)
Philadelphia	55	\$19,375,820	48	\$7,699,520	\$11,676,299

Source: SBA

2.1.3 Public Housing and Affordable Housing

Affordable housing in Philadelphia has experienced a reduction of available units due to multiple economic factors including the rise of living costs, national wage average, valuation of currency, employment opportunities to meet the requirements of mortgage and rent criteria, and available land for additional housing options. According to the City's Consolidated Plan, the availability of affordable housing has experienced a decline.

Table 14: Housing Costs

Category	2010 ACS 5-Year Estimate	2021 ACS 5-Year Estimate	% Change
Median Household Income (Family Income 2010)	\$45,610	\$52,649	+15.4%
Owner Occupied Housing Value	\$135,200	\$184,100	+36.2%
Owner Occupied Median Monthly Cost (with Mortgage)	\$1,201	\$1,403	+16.8%
Owner Occupied Cost Burden (with Mortgage)	19.9%	32.4%	+12.5%

Owner Occupied Cost Burden (without Mortgage)	11.1%	19.2%	+8.1%
Total Owner Occupied Cost Burdened	19.1%	27.2%	+8.1%
Renter Occupied Median Monthly Cost	\$819	\$1,149	+40.3%
Renter Occupied Cost Burden	56.1%	51.9%	-4.2%
Total Occupied Units Cost Burdened	43.3%	38.6%	-4.7%

Source: U.S. Census Bureau, 2021 American Community Survey, 5-Year Estimates

2.1.4 Multifamily Assisted Housing and Public Housing

The City was able to collect limited data on public housing from PHA. The City could not identify a data source which indicated varying ranges of damage for Multifamily Assisted Housing in the format of the HUD provided table. The City plans to continue exploring opportunities to secure additional data in these areas and upon availability will update this Plan accordingly.

Philadelphia has 72 multifamily public housing facilities, which include 8,978 residential units and 3,975 scattered site units for eligible residents. According to the Philadelphia Housing Authority, 59 of the public housing facilities incurred some level of damage, categorized as Minor (Routine), Urgent, or Emergency.

Table 15: Public Housing Facility Impacts

Priority	# of Facilities	Total Cost
Minor (Routine)	37	\$10,448.86
Urgent	18	\$3,842.89
Emergency	4	\$415.33
Total	59	\$14,707.08

Source: Philadelphia Housing Authority

The majority (63%) of the damage to Philadelphia's public housing falls into the minor range. The total amount of damages is relatively minimal, totaling only \$14,707.08. Initial findings indicate that there were no losses of unit occupancy in the public housing sector, and no immediate repairs were needed that were not covered by alternative funding sources. The City will continue to conduct research and outreach to validate these preliminary findings.

Public housing units serve vulnerable populations, including residents with disabilities, children under 5, and individuals over 65. These populations are statistically less able to afford mitigation and planning expenditures on their own, as stated in FEMA's 2022 Objective 1.3 - Achieve Equitable Outcomes For Those We Serve report. Efforts to improve the resiliency of Philadelphia's public housing units will support the city's overall goals of efficient crisis management and operability, with a particular focus on the needs of vulnerable populations.

Table 16: Public Housing Authorities Damaged

County/ Municipality	Total # PHA Multifamily Facilities	Scattered Sites (units)	Total PHA Units	Total PHA Facilities Damaged	# of Units Damaged	Total Damages
Philadelphia	72 (8,978 units)	3,975	12,953	59	-	\$14,707.08

Source: PHA

2.1.5 Outreach and Population Data

As a result of the widespread impact of Hurricane Ida, the entire city of Philadelphia has been classified as a MID area. The City is committed to utilizing its allocated funds to benefit as many residents as possible, with a particular focus on low- and moderate-income (LMI) individuals.

The City has already engaged residents through various outreach efforts. These efforts have involved communication with local community leaders and stakeholders, collaboration with nonprofit organizations, direct engagement with residents, and public surveys to identify community impacts and critical needs.

Ongoing community engagement will occur throughout the planning process and will be communicated through traditional print media, electronic media, social media platforms, housing and social service providers, and collaborative efforts with nonprofit organizations. Information-sharing websites, support hotlines, pop-up events (both virtual and in-person), crowdsourcing campaigns, and stakeholder collaborations during city-sponsored events, including public school and district events, will be utilized to ensure a broad range of residents can provide their input.

Support services will include various language options and measures in accordance with the City's public participation and Language Access Plans. The City will:

- Develop a network of points of contact for organizations and programs.
- Coordinate with organizations to address or eliminate any unlawful discriminatory practices.
- Provide a housing counseling and advisory assistance. These services will provide funds to subrecipients to help guide housing applicants through program implementation and complement the proposed housing activities.
- Provide regular technical assistance to subrecipients who need support.

Grantee Disaster Impacted Populations

Philadelphia, the largest city in the state of Pennsylvania, accounts for 12% of the state's population. Hurricane Ida caused significant and unforeseen damage in Philadelphia. Approximately 62% of all Philadelphia residents fall into the low- to moderate-income (LMI)

category, earning less than 80% of the Annual Household Median Income of \$52,649, based on HUD's 2014-2018 Comprehensive Housing Affordability Strategy Data. Low- to moderate-income households and individuals who already experience high cost burdening were statistically unable to undertake mitigation retrofits for their aging and deteriorating infrastructure prior to the hurricane's impact.

Table 17: Demographics and Disaster Impacted Populations

Demographic	State-Wide Estimates (State)	State-Wide %	Disaster Declaration Estimate (City)	Disaster Declaration % (City)	MID Estimates (City)	MID %
Total Population	12,970,650	100%	1,596,865	100%	1,596,865	100%
Under 5 years	700,792	5%	102,394	6%	102,394	6%
65 years and over	2,361,790	18%	219,185	14%	219,185	14%
Population with a Disability	1,767,211	14%	252,235	16%	252,235	16%

2.1.5.1 Income

Income plays a crucial role in conducting impact and needs analysis and developing CDBG-DR recovery projects. CDBG-DR funds require that at least 70% of the total allocation be used to benefit LMI individuals.

According to the 2021 Census ACS 5-Year Estimates, the median household income in Philadelphia is significantly lower than the state average, with a 22% difference. The city's median household income of \$52,649 is even more concerning when compared to the national median household income of \$70,784. This income disparity helps explain why Philadelphia's poverty rate (23%) is double that of the state (12%), leaving 18% of Philadelphia families living in poverty compared to 8% for Pennsylvania.

Table 18: Income Demographics

Income/Economic Demographics	Statewide	Areas Impacted by Disaster (Philadelphia)	HUD MIDs
Median Household Income	67,587	52,649	52,649
Per Capita Income	37,725	32,344	32,344
Persons in Poverty (percent)	11.8%	22.8%	22.8%
Families in Poverty (percent)	8.0%	18.3%	18.3%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

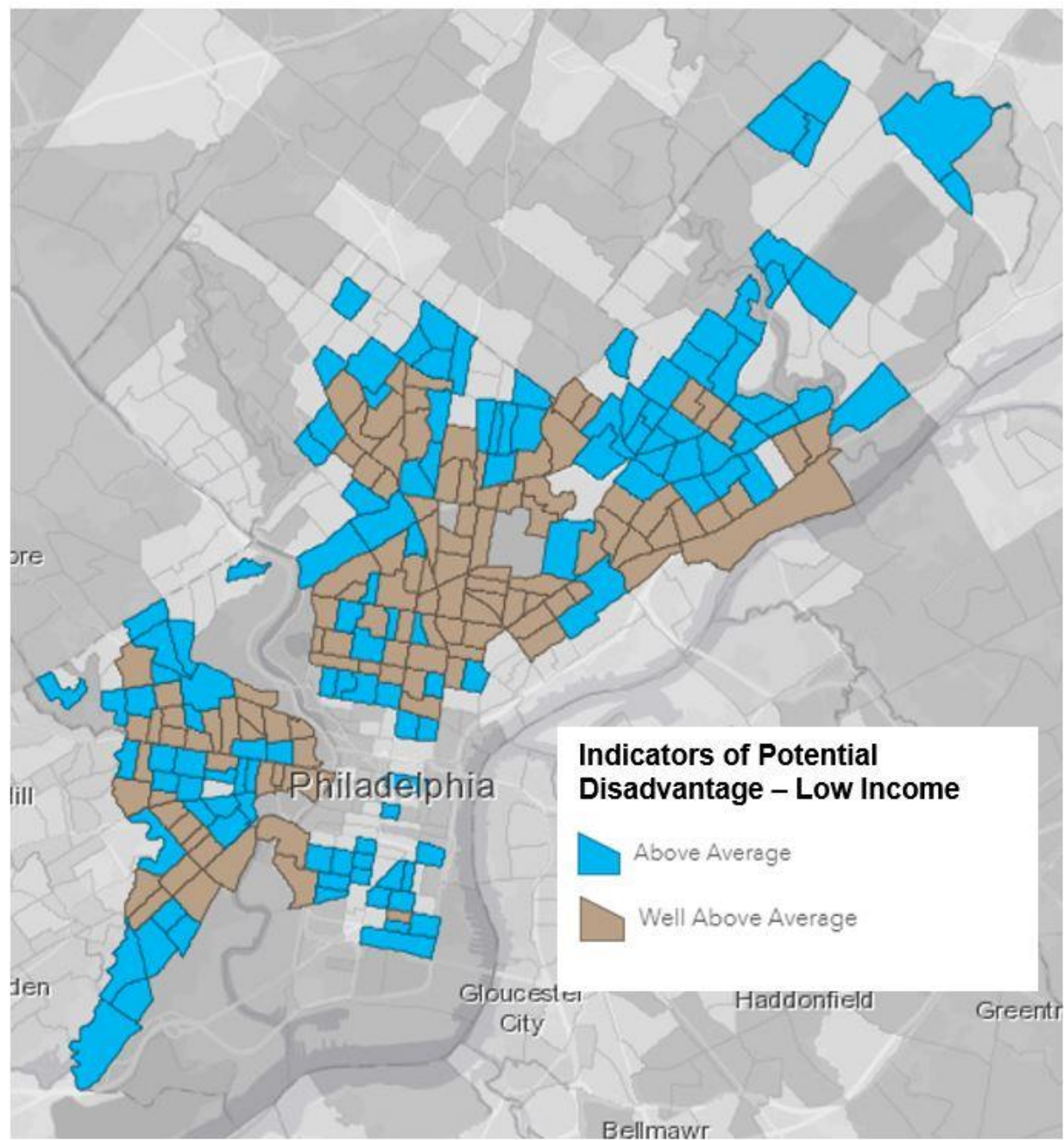
Table 19: Income Demographics - Low Income

Income/Economic Demographics	Statewide	Areas Impacted by Disaster (Philadelphia)	HUD MIDs
Income in the past 12 months below poverty level	1,482,811%	354,643	354,643

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Figure 10 below is based on the Delaware Valley Region Planning Commission's (DVRPC) Indicators of Potential Disadvantage mapping tool. The mapping tool uses U.S. Census American Community Survey (ACS) 2017-2021 five-year estimates data and maps these populations in each of the Census tracts in the Philadelphia region via GIS. The low income map uses income data from the ACS to identify Census tracts in Philadelphia that have a higher-than-average share of residents (compared to the regional average) that live with an income below 200% of the national poverty level. High rates of poverty existing across Philadelphia, especially in West Philadelphia, Southwest Philadelphia, South Philadelphia, North Philadelphia, and the River Wards along the Delaware River.

Figure 10: Concentrated Areas of Low-Income Populations



When analyzing income data in relation to disaster impacts and recovery, two key factors must be considered. First, lower-income populations and those living in poverty are more severely affected by disaster impacts due to their limited funds for property maintenance and improvements. It is extremely challenging for low-income households to afford necessary property maintenance projects, such as roof repairs or foundation work, especially given the age of many properties in Philadelphia, with over 40% built prior to 1940.

Individuals living below the federal poverty line are particularly vulnerable to the debilitating impacts of natural and human-caused hazards. They often lack the financial means to adequately prepare, respond, and recover from disasters. For example, FEMA recommends having a small cash reserve for emergencies, but households struggling to meet basic needs may find this difficult or impossible. Insurance coverage, such as home or flood insurance, is another indicator of faster recovery from disasters, but many individuals living in poverty cannot prioritize insurance due to limited resources.

2.1.5.2 LMI Analysis

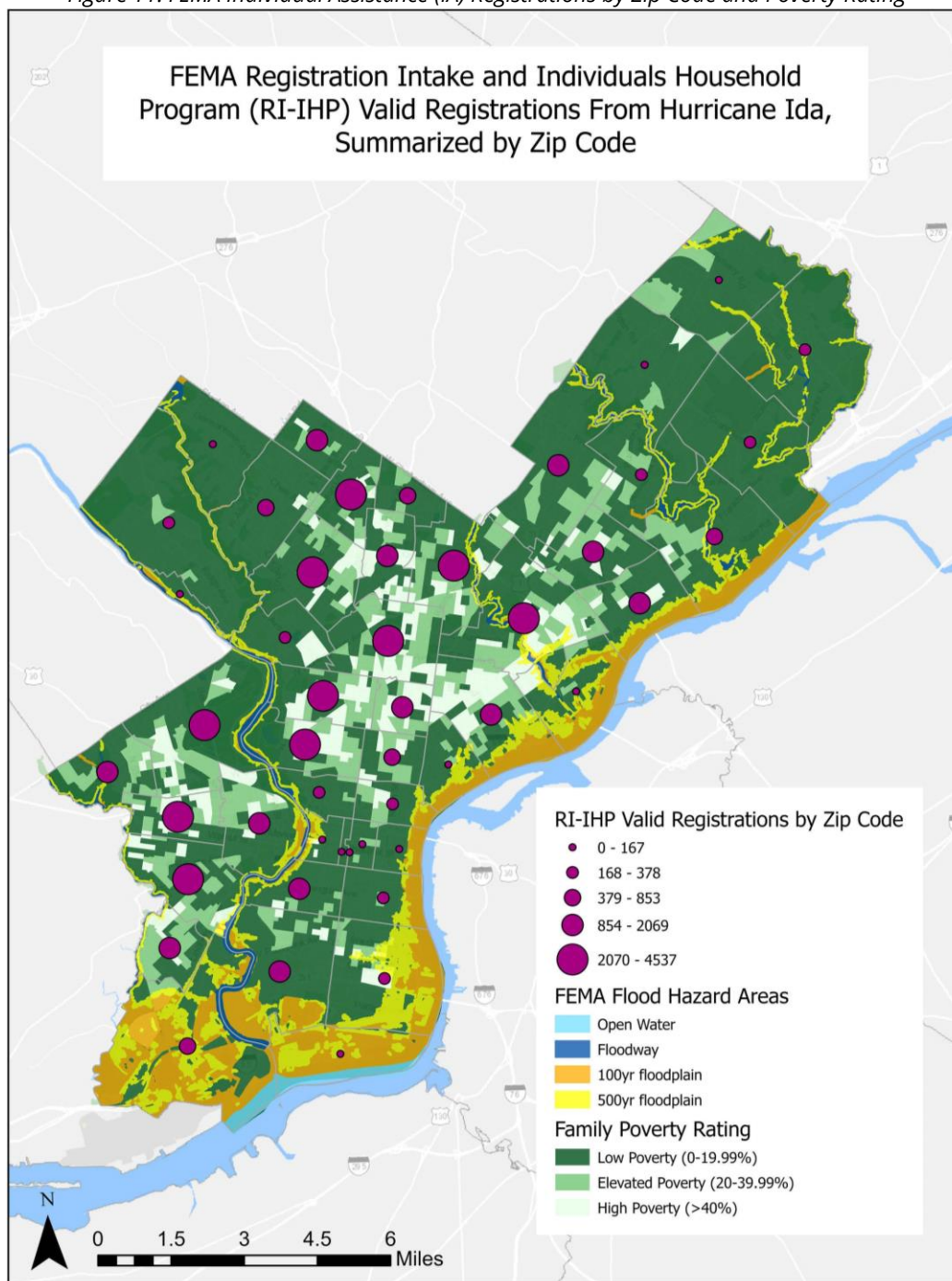
Low-Moderate income (LMI) persons and households are those that earn 80% or less of the area median income. LMI qualification is an important eligibility criterion for a majority of CDBG-DR funding. According to HUD's FY 2022 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data, 64% of Philadelphia's population qualifies as LMI. The City's average household income is \$52,649. Under the ongoing distress from previous disaster events or crises, the overall population faces challenges in making adequate housing improvement plans, with LMI communities being the most affected. Since the entire city of Philadelphia has been designated as MID and is the recipient of CDBG-DR funding, the MID area includes a majority of LMI-qualified population within the City.

Table 20: LMI Analysis - Federally Declared Disaster Areas

County/ Municipality	Non-MID- Total LMI Persons	Non-MID- Total Population	Non-MID- Percentage LMI	MID- Total LMI Persons	MID-Total Population	MID- Percentage LMI
Philadelphia	N/A	N/A	N/A	1,209,405	1,504,430	64.38%

Source: 2022 HUD LMISD Calculations

Figure 11: FEMA Individual Assistance (IA) Registrations by Zip Code and Poverty Rating



2.1.5.3 Housing Cost Burden

As described previously in Section 2.2 high housing costs make it challenging for households to afford other essential needs due to the high costs of housing. While cost burdening can affect households across the income spectrum, it disproportionately impacts those with

lower incomes, as they have fewer financial resources available once housing costs are accounted for. The Consolidated Plan highlights that low-income households and renter households experience housing cost burdening at higher rates compared to higher-income and homeowner households, with a significant portion consisting of families with children and individuals with disabilities.

According to the 2021 U.S. Census Bureau American Community Survey 5-Year Estimates, nearly 40% of households in Philadelphia are classified as cost burdened, meaning they spend 30% or more of their income on housing costs. Among these cost-burdened households, renters make up a substantial proportion (62%). Furthermore, 52% of all renters in Philadelphia experience cost burdening, while only 27% of homeowners face the same challenge. Among homeowners, those with existing housing debt, such as a mortgage, are more likely to be cost burdened, with 32% of owners with a mortgage experiencing this financial strain, compared to 19% of homeowners without a mortgage.

Table 21: Renter/Owner Cost Burdening

Category	Owners	Renters	All Households
Spending Less Than 30% of Income on Housing	242,997 (73%)	137,645 (48%)	380,642 (61%)
Spending 30% or More of Income on Housing	90,688 (27%)	148,706 (62%)	239,394 (39%)
All Households	333,685 (100%)	286,351 (100%)	620,036 (100%)

U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

2.1.5.4 Manufactured Housing

Manufactured housing, still referred to as mobile homes by FEMA and identified as such in the IA data, represents less than 1% of Philadelphia's housing stock, based on the American Community Survey 2021 5-year estimates. Among applicants for individual assistance, FEMA's data indicates that manufactured homes accounted for less than 1% (133) of all dwelling types. Of those applicants with manufactured homes, 92% (123) reported home damage, and 45% (60) indicated a need for shelter. However, FEMA identified only 9 out of the 123 units claiming damage (7%) as having verified real property loss. As a result, only 6 units were awarded repair funds for real property loss.

While the number is not significantly high, the zip codes with the highest number of manufactured housing applicants were 19128 and 19140, each with 11 applicants. These zip codes encompass the Roxborough-Manayunk section and the Tioga section of Philadelphia, respectively. It is worth noting that the 19140 zip code was identified as one of the areas most heavily impacted by Hurricane Ida, according to FEMA's heat map data.

Table 22: Manufactured Housing Units Impacted by Disaster

County	Total Number of Units	Number of Units with FVL	% of Total Units in County	FVL (Real Property \$)	FEMA Repair Amount	Remaining Unmet Need
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		(Real Property)				
Philadelphia	1,921	9	0.5%	\$118,711	\$106,232	\$12,479

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates, FEMA IA

Table 23: Actual Manufactured Housing Unmet Need Estimate

County	Units with FVL (Real Property)	FVL (Real Property \$)	FEMA Repair Amount	Remaining Unmet Need	Adjusted Damage Estimate (\$78,173)	Actual Unmet Need
Philadelphia	9	\$118,711	\$106,232	\$12,479	\$712,557	\$606,324

Source: FEMA IA

2.1.5.5 Assisted Housing

Assisted housing refers to properties that receive various benefits, as defined by HUD. These benefits include Federal Housing Administration (FHA) mortgage insurance, federal mortgage interest subsidies, project-based rental assistance such as Project Rental Assistance Contracts (PRAC), HOME-Home Investor Partnerships Programs, CDBG, Neighborhood Stabilization Program (NSP), and other HUD funding allocated through state and local jurisdictions.

At this time, data on the flooding impact of housing units classified as assisted housing beneficiaries is still pending analysis. Initial findings by the City indicate no significant need, but ongoing monitoring will be conducted to assess any potential impact.

Table 24: Assisted Housing Impacted by the Disaster

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Philadelphia	17,605	0	18,016	0	12,953	0	0

Source: HUD, Philadelphia Housing Authority

2.1.5.6 Unhoused Population

The storm event had minimal impact on unhoused populations. Many individuals were able to relocate to safer areas during the storm, as reported by the Continuum of Care (CoC). The CoC informed the unhoused and those in encampments about the approaching storm, heavy rainfall, and flooding, advising them to seek shelter by moving indoors, accessing Single Room Occupancies (SROs), or reuniting with family or friends. Outreach teams also encouraged those who declined these options to relocate to other parts of the city for their safety. As a result, there was only a slight increase in shelter utilization from August to October. Only one emergency shelter facility and traditional housing shelters experienced

minor structural damage, specifically flooding at the rear of the building.

Table 25: Point in Time Count

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area Wide	2,886	815	788	4489
FEMA Declared	100%	100%	100%	100%
MID	2,886	815	788	4489

Source: HUD

2.1.5.7 Point-in-Time Count - Impacted by Disaster

Point-in-time counts are conducted to capture an accurate snapshot of the homeless population in Philadelphia, including individuals who may be difficult to track. According to HUD PA-500, there are 4,489 individuals experiencing homelessness in Philadelphia, out of which 788 were unsheltered and directly impacted by Hurricane Ida. Those who cannot be reached for advance emergency warnings are at a heightened risk of severe flooding or other weather-related crises.

2.1.5.8 Individuals With Access and Functional Needs

Individuals with access and functional needs (AFN) require additional assistance in emergency or disaster situations due to temporary or permanent conditions that limit their ability to respond effectively. This group encompasses individuals with disabilities, seniors, limited access to transportation, and limited financial resources to prepare for, respond to, and recover from emergencies or disasters (FEMA, 2021). The City's Hazard Mitigation Plan recognizes the importance of prioritizing individuals with access and functional needs for appropriate considerations.

2.1.5.9 Other Populations with Special Needs

Persons with Disabilities

The U.S. Census Bureau provides a definition of disability as "a long-lasting sensory, physical, mental, or emotional condition or conditions that make it difficult for a person to engage in functional or participatory activities such as seeing, hearing, walking, climbing stairs, and learning" (U.S. Census Bureau, 2019, Table S1810).

According to the American Community Survey 2021 5-Year Estimates, approximately 16.9% of Philadelphia's population aged five and older are living with one or more disabilities. These disabilities can range from behavioral health difficulties to mobility, hearing, and vision impairments, which may impact individuals' ability to respond to and recover from extreme weather events. Residents with disabilities are considered a vulnerable population and may require additional support to effectively manage their needs before, during, and after a crisis. It's important to address the challenges posed by impaired streets for emergency services, as it can further exacerbate risks for residents with disabilities, who may face significant health challenges during and following a crisis.

Table 26: Individuals with Disability & Age

Age	Individuals with a disability	Percent of population in age group
Under 5 years	835	1%
5 to 17 years	20,870	9%
18 to 34 years	35,649	8%
35 to 64 years	114,084	20%
65 to 74 years	42,052	34%
75 years and over	48,156	55%
Total	261,646	17%

Shortage of Accessible Housing

According to Philadelphia's Assessment of Fair Housing Report, there are 261,646 individuals with disabilities in Philadelphia, accounting for 16.7% of the population. These individuals require housing units that are suitable for their specific needs and affordable. However, finding accessible and affordable housing has proven challenging for residents with disabilities in Philadelphia. The report highlights a significant disparity between the number of people with disabilities in poverty and those living in subsidized housing, indicating a shortage of affordable and accessible housing options for disabled residents. With most disabled residents having fixed incomes and limited options as rental costs increase, finding accessible and affordable units has become increasingly difficult.

Even before the widespread damages caused by Hurricane Ida, the availability of housing for residents with specific accessibility needs was inadequate. The Assessment of Fair Housing report identifies affordable housing as a pre-existing challenge for low- to moderate-income residents, unhoused populations, and the general public. Many buildings and public infrastructure in Philadelphia were designed prior to the implementation of the Architectural Barriers Act of 1968, and they have not been updated to comply with its accessibility standards. These structures are in dire need of improvement and upgrading, although this can be challenging due to design limitations or physical constraints. To address this issue, the city may need to consider supporting the development of new housing units that can accommodate accessibility needs, thus expanding the availability of accessible housing.

Senior Residents

Senior citizens are considered a vulnerable population due to the challenges that can arise with aging, including health concerns, mobility limitations, and reduced income as reliance on fixed income increases. According to Census data compiled by the Philadelphia Corporation for Aging in 2021, there are 311,808 individuals aged 60 or older in Philadelphia. Among this group, 75,769 live below the federal poverty line. Among those living below the poverty line, the following percentages experience specific difficulties: 14% have cognitive difficulties, 30% have ambulatory difficulties, 9% have vision difficulties, 12% struggle with hearing, 23% experience challenges with instrumental activities of daily living (such as cooking, cleaning, transportation, laundry, and managing finances), and 14% struggle with at

least one activity of daily living (such as eating or bathing). Severe flooding scenarios or other city-wide crises can pose an increased threat to senior residents as their access to routine daily living support may be delayed, surpassing the threshold for survival.

Children

According to the 2021 ACS 5-year data, children under the age of 18 make up approximately 22% of Philadelphia's population. Similar to senior residents, children are highly affected by disasters, and households with multiple children require support in managing crises and the recovery process. Children rely on their parent(s) or legal guardians for essential needs, but during a disaster, providing for these necessities can pose significant challenges, especially for children in LMI communities, as well as those with disabilities. Additionally, the long-term effects of a disaster can have a detrimental impact on children's mental health and development. It is crucial to address the specific needs of children and ensure their well-being during and after a crisis.

Table 27: Children 18 and Under

Children 18 and Under	Philadelphia
Total Population	1,586,865
Percent of children under 18 years	21.8%
Percent of children below the federal poverty level	31.9%
Percent of disabled children	10.3%

Religion

The below tables show the percentage of persons by religious affiliation. Out of these religious groups, there are more persons affiliated with Catholic, Evangelical Protestant, Mainline Protestant, Black Protestant, and Islam. The data displayed below is not inclusive of all religious categories and reflects information on the religious groups participating in the census. More details about the data can be found on the U.S. Religion Census and the Public Religion Research Institute's websites.

Table 28: Persons by Religious Affiliation (U.S. Religion Census, 2020 Study and PPRI Census of American Religion)

Tradition	Total	Percent
Black Protestant	88,492	13%
Buddhism	12,604	2%
Catholic	253,876	37%
Evangelical Protestant	121,314	18%
Hinduism	8,669	1%
Islam	70,065	10%
Judaism	16,924	2%
Mainline Protestant	88,663	13%
Orthodox	7,270	1%
Other	24,169	3%

Total	692,046	100%
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Indigenous Populations and Tribal Communities

According to the National Park Service, “the original inhabitants of what is now Pennsylvania included the Lenape, or Delaware, tribe and the Susquehannock tribe. Other tribes, particularly the Nanticoke and the Shawnee, migrated into Pennsylvania and New Jersey after the Europeans arrived.

In the early 1600s, there were an estimated 5,000-7,000 Susquehannock but by 1700, their numbers had dwindled to 300, most likely brought on by the introduction of European diseases. According to historical accounts in 1763, a mob lynched the remaining 20 known Susquehannock. Descendants of the Susquehannock remain, although there is no known descendant community.

There are no federally recognized Indian tribes in Pennsylvania, though the most recent census reports an American Indian population of more than 12,000. The Lenape continue to have a modern presence and are working to preserve the heritage of the Algonquian-speaking tribes of eastern Pennsylvania and Delaware” (National Park Service, n.d.).

2.2 Infrastructure Unmet Need

2.2.1 FEMA Public Assistance

The City of Philadelphia identified considerable impacts on public facilities and infrastructure from Hurricane Ida that damaged public buildings, roads and bridges, utilities, and parks. The City is coordinating and evaluating the impacts of Hurricane Ida on infrastructure and public facilities in partnership with FEMA. Project scoping and reviews are ongoing. FEMA PA-eligible activities include emergency work and permanent restoration work, which are divided into the following categories:

- Emergency work
 - Debris Removal; and
 - Emergency Protective Measures.
- Permanent work
 - Roads and Bridges;
 - Water Control Facilities;
 - Buildings and Equipment;
 - Utilities; and
 - Parks, Recreational, Other.

Current estimates for FEMA PA eligible emergency work and damage to public facilities and infrastructure place the total cost at approximately \$9.5 million.

Table 29: FEMA Public Assistance Program

PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A – Debris Removal	Multiple/Citywide	\$706,377.43	\$635,739.69	\$70,637.47
B – Protective Measures	Multiple/Citywide	\$790,407.19	\$711,366.47	\$79,040.72
C – Roads and Bridges	N/A	\$0.00	\$0.00	\$0.00
D - Water Control Facilities	4	\$4,757,288.25	\$4,281,559.43	\$475,728.82
E – Public Buildings	8	\$2,409,576.00	\$2,168,618.40	\$240,947.60
F – Public Utilities	N/A	\$0.00	\$0.00	\$0.00
G – Recreational or Other	6	\$849,406.15	\$764,465.54	\$84,940.62
Z – State Management	N/A	\$475,000.00	\$475,000.00	\$0.00

Source: FEMA PA

The table below builds off of the previous FEMA PA table. HUD allows grantees to include a 15% mark up for resilience improvements, so the following table shows the total local match by category with the additional 15%, resulting in the Total Need column.

Table 30: Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$706,377	\$0	15%	\$105,957
B - Emergency Measures	\$790,407	\$0	15%	\$118,561
C - Roads and Bridges	\$0	\$0	15%	\$0
D - Water Control Facilities	\$4,757,288	\$0	15%	\$713,593
E - Building and Equipment	\$2,409,576	\$0	15%	\$361,436
F - Utilities	\$0	\$0	15%	\$0
G - Other	\$849,406	\$0.00	15%	\$127,411
Total	\$9,513,055	\$0	\$1,426,958	\$1,426,958

Source: FEMA PA

While FEMA has determined approximately \$9.5 million in damages to be eligible under its Public Assistance Program, that number does not reflect the entirety of the damage. Not only was the damage considerable in scale, but Hurricane Ida also impacted a wide range of facility types, including public buildings, roads, utility infrastructure and parks. Additional damage is summarized and documented below.

2.2.2 Transportation

Floodwaters damaged major roadways and caused temporary closure of hundreds of other roads and bridges until the waters receded. Closures of local roadways and bridges greatly increased commuting times and negatively impacted response times for emergency services. As described in the executive summary, I-676 was closed for several days because significant portions of the highway were submerged in floodwaters. According to the Federal Highway Administration (FHWA), Hurricane Ida caused approximately \$3.8 million in damage to Federal-aid highways in Philadelphia. Hurricane Ida also disrupted Amtrak's rail operations while also damaging rail facilities. According to Amtrak, the storm caused approximately \$4.1 million in damage to operations and facilities in Philadelphia.

Figure 12: Interstate 676 after Hurricane Ida



Figure 13: Interstate 676 after Hurricane Ida



2.2.3 Buildings and Equipment

Hurricane Ida flooding also significantly impacted numerous public facilities, government buildings, schools, police and fire stations, medical services and offices, and other businesses. In addition to the public facilities described above, Hurricane Ida significantly impacted City facilities. More specifically, Hurricane Ida damaged Engine 34 in East Falls and Engine 12 in Manayunk. Impacts included flooding and damage on the ground floor and lower levels of both facilities. Facility equipment and building infrastructure was also substantially damaged.

2.2.4 Parks & Recreation and Other Facilities

Facilities and infrastructure assets managed by Philadelphia Parks and Recreation (PPR) were substantially damaged across 28 different sites. Specific assets include the docks, recreation centers and facilities, riverbanks and walls, the Schuylkill River spectator grandstand, building systems and equipment in PPR facilities (i.e. HVAC, fire alarm systems, electric panels, elevators, etc.), numerous trails, river and waterway amenities, historic features, art, playgrounds, lighting, trees, and landscaping. One of the most heavily damaged trails was the Manayunk Canal Tow Path, which had to be closed for repairs due to flooding that washed away major portions of the path and railings. The Schuylkill River Trail in Schuylkill River Park and East Fairmount Park and the Pennypack Park Trail also suffered damage. Additionally, seven miles of trails and some parking lots in Wissahickon Valley Park were damaged. The storm also deposited debris at sites along the river, including large piles of debris, vehicles, and equipment. The Fairmount Dam and Dell Music Center were also impacted along with various recreation buildings and playground facilities across the city. The total estimated damage was at least \$6.1 million.

2.2.5 Utilities

2.2.5.1 Water Infrastructure

A major consequence of the storm was an impact on water infrastructure including potable water, wastewater, and stormwater services. Floodwaters damaged the raw water intake pumps on the Schuylkill River, forcing PWD to suspend operations of water treatment facilities. During consultations with PWD, staff noted the disruption to the water access from the storm event. If a similar outage knocked out an additional facility, Philadelphia's access to clean water would have been severely limited.

Floodwaters also inundated the City's wastewater systems, which are mostly combined sewers. During the storm event, the system's normal capacity was inundated. Impacts included overcapacity that led to sewer overflows and backups. In the City, flooding came within a few feet of knocking out the electrical systems for the sewage treatment plant. The City was forced to shut down critical water infrastructure facilities.

PWD estimates over \$455 million in unmet recovery needs that address direct and indirect impacts from the remnants of Hurricane Ida. This estimate includes large-scale projects that will restore and improve critical facilities such as water treatment plants, pumping stations, key transmission mains, and stormwater management infrastructure impacted by Hurricane Ida. Specific sites include but are not limited to:

Table 31: Water Infrastructure Unmet Needs

Site/Project	Estimate Cost
Lardner's Point Fresh Water Pumping Station Reconstruction	\$285,000,000
Queen Lane Raw Water Pumping Station Restoration & Betterment	\$120,000,000
42nd St. Waste/Storm Water Pumping Station Restoration & Betterment	\$50,000,000
Germantown Wingohocking Creek Flooding	\$5,000,000

Source: Philadelphia Water Department (PWD)

2.2.6 Hazard Mitigation

FEMA's Hazard Mitigation Grant Program (HMGP) provides funding to State, local, tribal and territorial governments so that they can rebuild in a way that reduces, or mitigates, future disaster losses in their communities. HMGP assists communities in rebuilding in a better, stronger, and safer manner to become more resilient to future natural disaster events. This grant funding is available after a presidentially declared disaster and can fund a wide variety of mitigation projects.

HMGP can be used to fund projects to protect either public or private property, as long as the project fits within State and local government mitigation strategies to address areas of risk and complies with HMGP guidelines. OEM, in coordination with the City of Philadelphia's Hazard Mitigation Steering Committee, manages the City application process for HMGP

funding. No HMGP applications associated with the disaster declaration were identified by the City.

2.3 Economic Revitalization Unmet Need

2.3.1 Disaster Damage and Impacts - Economic Revitalization

All disasters result in economic impacts, from business disruption to disaster related unemployment. Businesses and private industry structures, including restaurants, shops, grocery stores, gas stations and other businesses, were destroyed, threatening the ability for communities to have access to the services needed for residents to come back. The impact varied from neighborhood to neighborhood.

2.3.2 Unemployment Rates

According to data released by the U.S. Bureau of Labor Statistics in March 2023, Philadelphia's unemployment rate was 4.4%.

2.3.3 Small Business Administration (SBA) Commercial Losses

The SBA offers Economic Injury Disaster Loans (EIDL) and Business Disaster Loans to businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations, such as public service, faith-based, and private universities, also are eligible. The law limits business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

For the 2021 disaster, DR 4618, there were 47 SBA business loan applications from impacted counties, totaling over \$12 million in verified losses. In total, around \$4.1 million in SBA assistance was loaned to impacted businesses.

2.3.4 Total Business Loans Approved by the SBA

Table 32: Total Business Loans Approved by the SBA

County	Business Code	Approved Business/EIDL Loans	Total Business/EIDL Loan Applications	Total Approved (\$)
Philadelphia	Pending	14	47	\$4,116,700

Source: SBA

Table 33: SBA Business Loan Data

Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount (Business/EIDL)	Total Unmet Need
Philadelphia	\$12,007,726	\$4,116,700	\$7,891,026

Source: SBA

2.3.5 Philadelphia Merchants Fund Support

While the SBA data provides insight into businesses that applied for assistance, this does not reflect the full impacts of the disaster. The City continues to work with community organizations, chambers of commerce, business organizations, and impacted areas to further refine the economic impact and unmet economic recovery needs. This includes the Philadelphia Merchants Fund.

The Merchants Fund (TMF) offers grants to Philadelphia businesses that experience an unexpected incident or emergency that severely disrupts operations or prevents the business from operating such as Hurricane Ida. Following Hurricane Ida, the Merchants Fund distributed 62 grants totaling over \$328,000 of assistance. The average grant was \$5,290. The total amount of damage identified by all applicants combined was \$6.76 million. The total unmet need is \$6,432,000.

2.4 Unmet Needs Summary

This section includes a summary of the total impacts from Hurricane Ida, the total resources available, and the total unmet recovery needs. The City will continue to monitor the data available and continue its consultations with impacted areas and residents to ensure it collects the most current data available.

Table 34: Unmet Needs Summary (Rounded)

Category	Data Type	Total Damage	Total Resources	Unmet Need	Percentage
Housing	FEMA IA, SBA	\$810,141,000	\$41,320,000	\$810,140,419	61%
Infrastructure	FEMA PA, FHWA, Local Data	\$484,066,000	\$9,514,000	\$474,553,000	38%
Economic Revitalization	SBA, Local Data	\$19,516,000	\$3,429,000	\$16,087,000	1%
Total	N/A	\$1,313,723,000	\$54,263,000	\$1,300,780,419	100%

2.5 Mitigation Needs Assessment

2.5.1 Overview

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural threats and hazards in Philadelphia. The Mitigation Needs Assessment informs how resilience and mitigation measures can be built into recovery programs and projects. [Philadelphia's 2022 All-Hazard Mitigation Plan \(HMP\)](#) provides the factual basis for developing this needs assessment and the strategy for the Philadelphia CDBG-DR mitigation set aside. The hazards outlined in this section are based on a post-disaster evaluation which was incorporated in the 2022 HMP.

In addition to current hazards posed to Philadelphia following Hurricane Ida, the Mitigation Needs Assessment also considers future threats, particularly as severe weather events become more frequent and severe. In this way, the City can ensure it minimizes vulnerabilities to the impacts of future extreme events through its recovery and mitigation projects and programs. This assessment will provide a basis upon which to propose programs and projects as part of this plan that will mitigate current and future hazards.

As part of this assessment, Philadelphia also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions and/or are critical to human health and safety, and economic security.

Philadelphia's All-Hazard Mitigation Plan (HMP) was last updated in May 2022, and identifies eighteen natural and human-caused hazards and threats that pose the greatest risk to Philadelphia. Hazards in the plan were ranked using a standardized Risk Factor (RF) Methodology modeled off the [Pennsylvania Hazard Mitigation Plan](#). A RF value was determined for each hazard by assigning varying degrees of risk to five weighted categories for each hazard: probability, impact, spatial extent, warning time, and duration.

The following table lists the Risk Factor calculated for each of the eighteen potential hazards identified in the 2022 HMP. Hazards identified as **high risk** have risk factors greater than or equal to 2.5. Risk Factors ranging from 2.0 to 2.4 are considered **moderate risk** hazards. Hazards with Risk Factors less than 2.0 are considered **low risk**. According to the default weighting scheme applied, the highest possible Risk Factor value is 4.0.

Table 35: Risk Factor Rankings

Hazard	0.3	0.3	0.2	0.1	0.1	Overall Risk
	Probability	Impact	Spatial Extent	Warning Time	Duration	
Flood, Flash Flood, Ice Jam	4	4	3	2	4	3.6
Opioid Addiction Response	4	4	3	1	4	3.5
Pandemic and Infectious Disease	3	4	4	1	4	3.4
Extreme Temperature	4	3	4	1	3	3.3

Hurricane, Tropical Storm, Nor'easter	3	4	4	1	3	3.3
Urban Fire and Explosion	4	3	3	4	1	3.2
War and Criminal Activity	3	4	3	4	1	3.2
Hazardous Materials Release	3	3	2	4	4	3.0
Winter Storm	4	2	4	1	3	3.0
Tornado, Windstorm	4	3	2	2	1	2.8
Terrorism	1	4	2	4	1	2.4
Drought	2	1.5	4	1	4	2.4
Cyber Terrorism	3	1	2	4	3	2.3
Building and Structure Collapse	2	2	2	4	1	2.1
Dam Failure	1	3	2	2	3	2.1
Civil Disturbance	2	2	2	2	1	1.9
Earthquake	1	1	4	4	1	1.9
Subsidence, Sinkhole	2	2	1	2	3	1.9

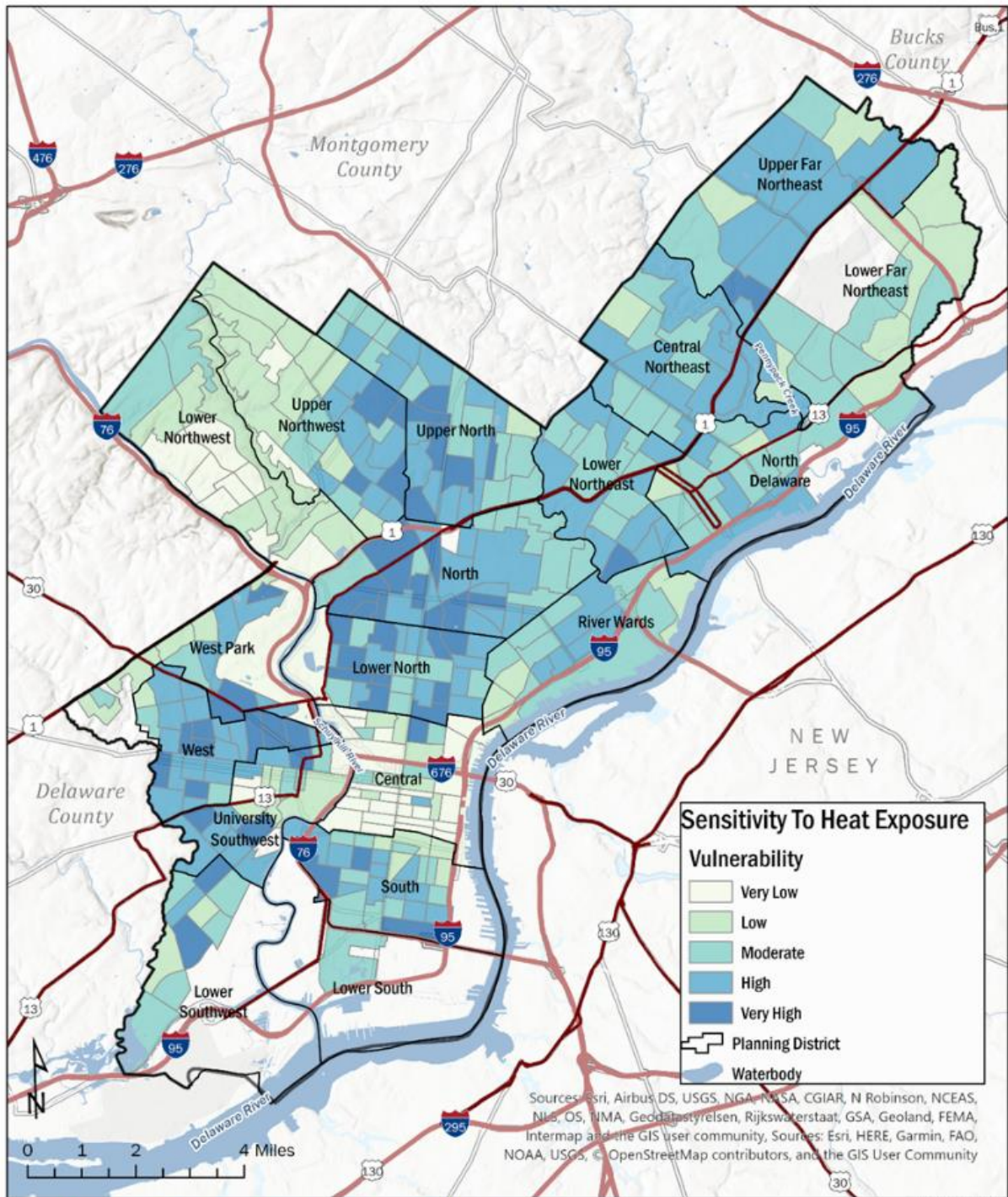
Analysts identified the greatest risk hazards as those natural hazards designated as “Top Priority” or “High Priority” in the Hazard Mitigation Plan. Flooding remains Philadelphia’s highest risk hazard. Analysts further narrowed down high-risk hazards in this Needs Assessment to hazards that Philadelphia should prioritize mitigating to increase resilience to future storm events like Ida: Extreme temperatures, flooding, tornadoes/windstorms, and cyclones (hurricanes, tropical storms, and nor’easters).

2.5.2 Extreme Temperatures

Extreme heat often results in the highest number of annual deaths of all weather-related hazards. In most of the United States, extreme heat is defined as a long period (2 to 3 days) of high heat and humidity with temperatures above 90 degrees (Ready.gov, 2018).

Extreme temperature events typically affect all neighborhoods within Philadelphia, but certain neighborhoods experience higher than usual temperatures during the summer due to the urban heat island effect. According to Philadelphia’s Heat Vulnerability Index (HVI), the most vulnerable neighborhoods can be up to 22 degrees hotter than the least vulnerable (City of Philadelphia, 2019). As shown by the map below, these neighborhoods are most concentrated in the North, West, and South overlapping with areas that have low-income populations. Individuals living in these areas have a higher risk of heat-related illnesses and death.

Figure 14: Sensitivity to Heat Exposure



**SENSITIVITY TO HEAT EXPOSURE
BY CENSUS TRACT
CITY OF PHILADELPHIA**

January 21, 2022



Spatial Reference
GCS: GCS North American 1983
Datum: North American 1983
Projection: Lambert Conformal Conic

The chart below shows the increased heat risk that Philadelphians may experience by mid and end of century. This data comes from downscaled data obtained by the Philadelphia Office of Sustainability.

Table 36: Future Temperature Projections

Category	Observed (1950-1999)	Projections for 2040-2059	Projections for 2080-2099
Average summer temperatures	84.5°F	89.7 - 90.5°F	90.7 - 96.4°F
Average number of days above 95°F	3	22 - 26.4	27.8 - 66.7
Average number of days above 100°F	0	5 - 7.5	6.7 - 30.6
Hottest 7-day average temperature	92°F	97.1 - 97.9°F	97.4 - 102.4°F

Philadelphia's main challenge when faced with extreme temperatures is public health and safety, especially among populations that are more at risk due to increased exposure or intrinsic factors. Though extreme temperature events usually persist for short durations, they can cause a range of impacts to humans, animals, and infrastructure. This is especially concerning for Philadelphia where many areas of the city have a high concentration of populations more at-risk, particularly those with little or no access to adequate cooling or heating. Many Philadelphians meet criteria that make them more susceptible to hazardous effects of extreme temperatures, such as older adults (13% of the population), infants/children up to five years of age (7%), and those living below the poverty line (23%) (U.S. Census Bureau, 2019). Philadelphia's population experiencing homelessness is especially vulnerable.

When hot weather results in poor air quality, health impacts on those with respiratory conditions are also a concern. In Philadelphia, an estimated 20% of children under age five have Asthma (PHMC, n.d.) and asthma-related hospitalizations are more than five times as likely to impact Black children compared to White children (Philadelphia DPH, 2019).

Besides the risks of extreme temperatures to the people, parts of Philadelphia's utility infrastructure are susceptible to extreme temperatures, which may overload the power grid or damage pipes that provide water, wastewater, and natural gas. During extreme cold episodes, frozen or fractured pipes and frozen water intakes can create service interruptions in water, drainage, and gas supply.

Transportation infrastructure can also be impacted by extreme temperatures. During extreme heat, roads and bridges can buckle due to expansion and heat kinks can form on railway lines. Extreme cold can result in freeze-thaw cycles that cause cracking or potholes in roadway surfaces. Roadway repair from this type of winter damage is the major driver of economic losses related to extreme temperatures in Philadelphia.

The National Oceanic and Atmospheric Administration's (NOAA) Storm Events Database tracks 'Heat' and 'Extreme Cold/Wind Chill' events along with deaths and injuries with data available for Philadelphia since 1996. From 1996-2021, there were 91 'Heat' events causing 260 deaths and 249 injuries. In the same period, there were 4 'Extreme Cold/Wind Chill' causing 3 deaths and no injuries. The deadliest extreme temperature events were heat events dated: 7/12/1997, 7/4/1999, 8/6/2001, 7/1/2002, and 8/1/2006. The July 4, 1999 heat event killed 58 people and injured 124.

2.5.3 Flooding

Pennsylvania is one of the most flood-prone states in the United States. Southeastern Pennsylvania, where Philadelphia is located, is one of the most susceptible regions in the state. Philadelphia is situated between two tidal rivers: the Delaware River and the Schuylkill River. The City experiences tidal effects along its entire eastern border, as well as on the Schuylkill River, Cobbs and Darby Creeks in southwest Philadelphia, Tacony/Frankford Creek, and the Pennypack and Poquessing Creeks in northeast Philadelphia. Other creeks and streams within Philadelphia, like the Wissahickon Creek, are not influenced by tides.

Due to Philadelphia's geographic location and densely urbanized city center, there are multiple types of flooding that can occur within the City. Some of the most damaging floods occur within designated floodplains – the areas along rivers and major creeks – or in areas with limited drainage capacity.

Figure 15: Where Philadelphia Floods



The primary types of flooding that occur in Philadelphia include:

- Riverine (fluvial)
- Coastal (high tides, storm surge)
- Urban Flooding (pluvial)

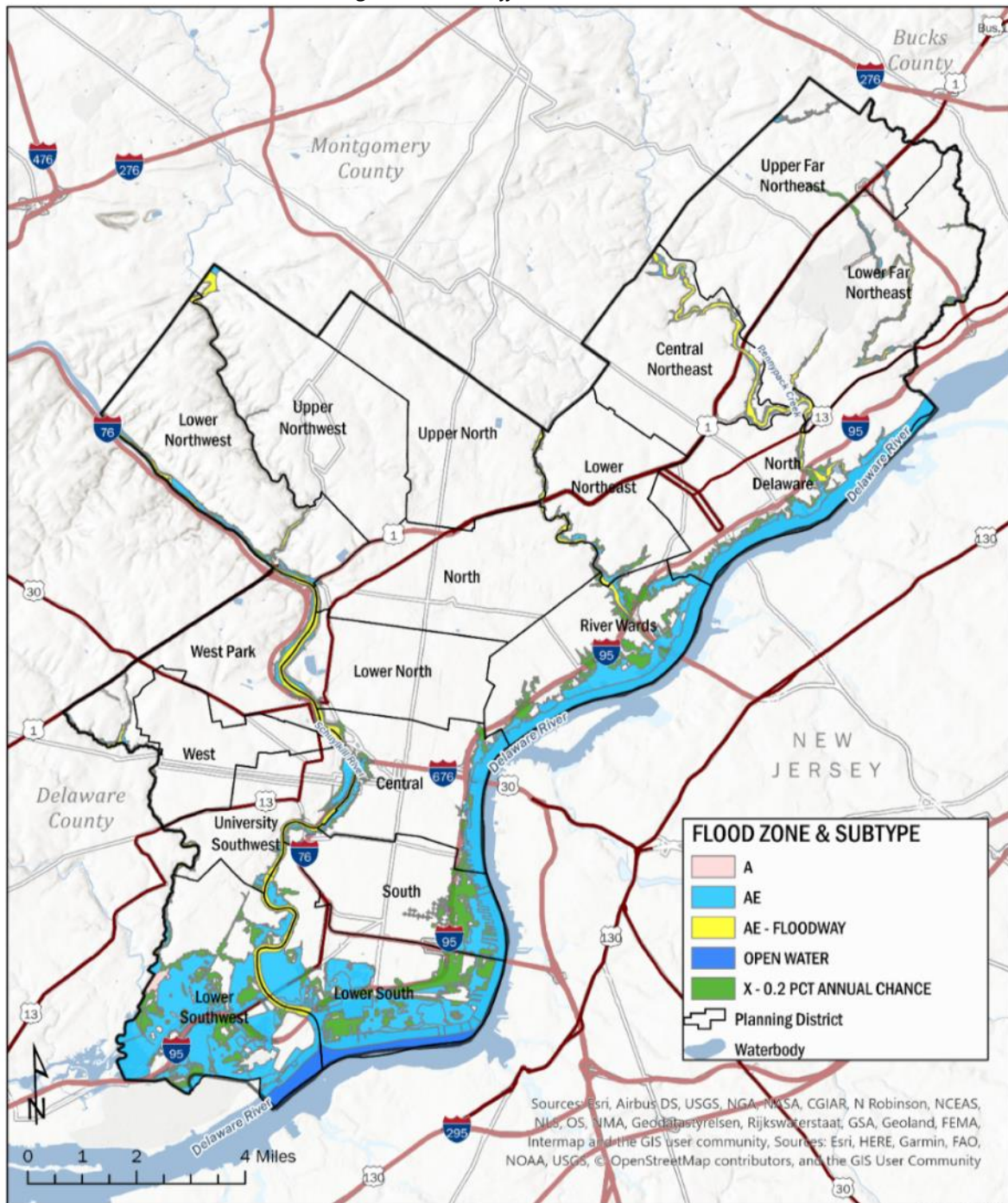
Philadelphia's rivers and creeks cause flooding in the City's floodplains. **Riverine flooding** is when streams and rivers overtop the stream banks following precipitation that can range from both short or long, intense events, to lengthy but mild events which hover over a given

watershed. Rapid accumulation and release of runoff waters caused by heavy rainfall, cloudbursts, landslides, or the sudden break-up of an ice jam can cause “flash flooding” and overwhelm rivers and tributaries. Because Philadelphia is located at the lower end of major watersheds, it is particularly susceptible to flooding when heavy rainfall accumulates as it flows downstream, leading to higher and faster flowing floodwaters.

Although Philadelphia is roughly 90 miles from the open ocean, the City is situated on two rivers that are influenced by the tides, so the City experiences both riverine and coastal flooding. The primary difference between riverine and coastal flooding has to do with the source of the floodwaters. **Coastal flooding** is raised water surface elevation from high-tides, storm surge, and sea level rise. The tidal Delaware River and its tributaries are susceptible to coastal flooding because they are impacted by ocean tides and storm surge. High tides on the Delaware River and Schuylkill River can also contribute to basement backups. If rainfall-induced riverine flooding and tide or storm surge-induced coastal flooding occur simultaneously, this is referred to as compound flooding.

Two areas in Philadelphia repeatedly experience catastrophic flooding: Eastwick, in southwest Philadelphia, and Manayunk, in northwest Philadelphia. Both neighborhoods have many properties with Repetitive Losses tracked by FEMA.

Figure 16: FEMA Effective Flood Zones



January 21, 2022

**FEMA EFFECTIVE FLOOD ZONES:
NATIONAL FLOOD HAZARD LAYER (NFHL)
CITY OF PHILADELPHIA**



Spatial Reference
GCS: GCS North American 1983
Datum: North American 1983
Projection: Lambert Conformal Conic

Urban Flooding is flooding in the built environment, regardless of proximity to mapped floodplains, due to the absence of storm sewers or drainage systems, or the inability of these systems to handle runoff volume and overland flow. This may present as sewer backups or

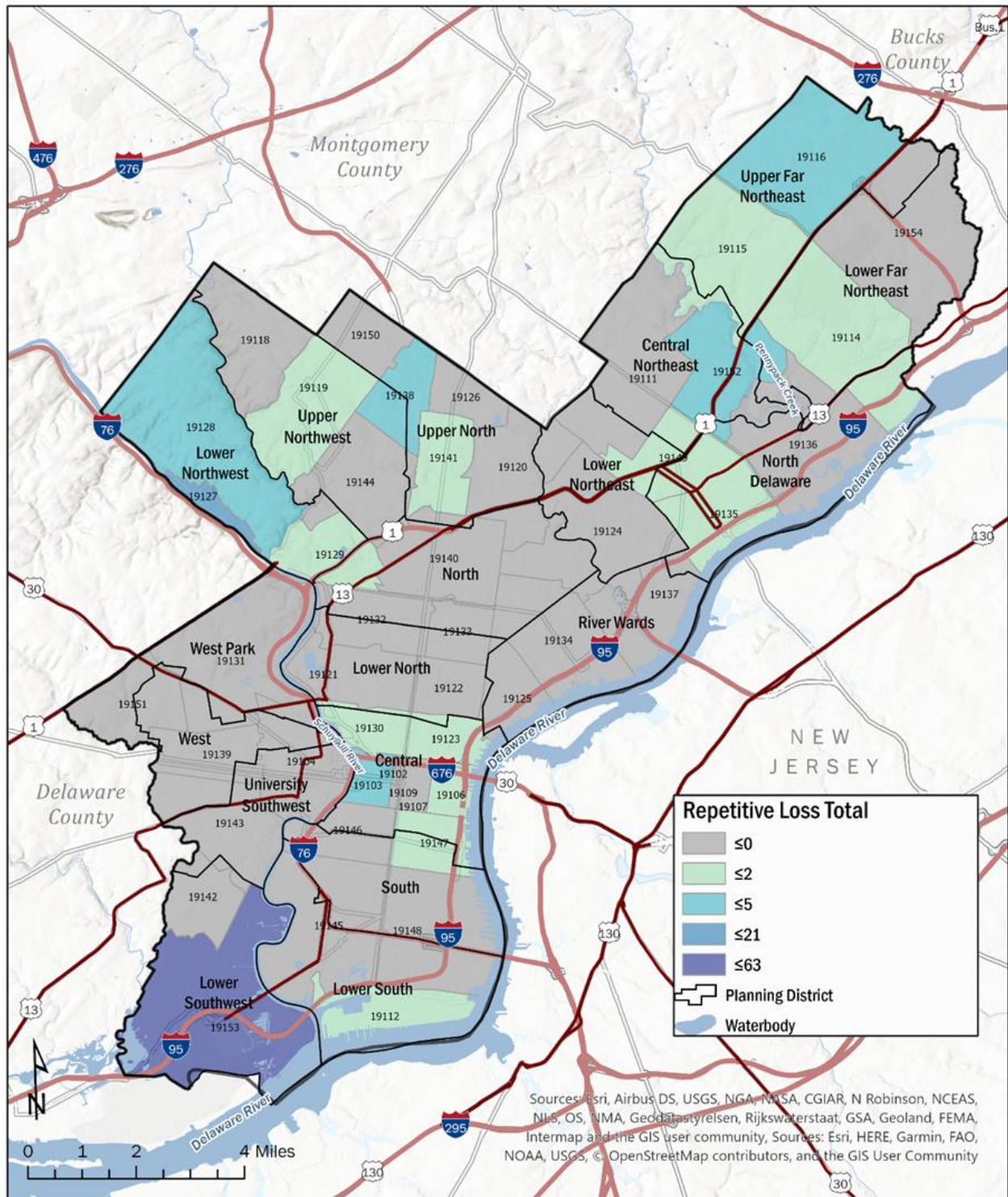
accumulation in rights-of-way. Densely populated areas have a high risk for flash floods as well, as the construction of buildings, highways, driveways, and parking lots increases runoff by reducing the amount of rain absorbed by the ground. When available ground surfaces become saturated, existing groundwater levels may increase, and seep through the floors and walls of basements. Flash flooding may also lead to localized, overwhelmed sewer systems and basement backups through basement fixtures and drains.

As the most common hazard for Philadelphia, flooding is a near routine occurrence for some regions of the city. Numerous instances happen throughout the year, each causing various levels of damage. The Schuylkill often has high crests, with the top ten crests averaging between 14 and 15 feet.

Flooding can cause structural losses within the City of Philadelphia, including homes, businesses, and critical facilities. According to the 2021 OPA tax account data, there are an estimated 534,717 properties in Philadelphia. Approximately 6,965 of those are located within the 1-percent annual chance area. Some of the properties within the 1-percent chance area include critical facilities. A critical facility is a facility that provides services and functions essential to a community, especially during and after a disaster.

The probability of future flooding in Philadelphia is high, especially for communities located in the 1.0-percent annual chance zone. Repetitive loss neighborhoods, such as Eastwick and Manayunk, will continue to experience significant flooding.

Figure 17: NFIP Repetitive Loss Properties by Zip Code



January 21, 2022

NFIP REPETITIVE LOSS PROPERTIES BY ZIP-CODE CITY OF PHILADELPHIA



Spatial Reference
GCS: GCS North American 1983
Datum: North American 1983
Projection: Lambert Conformal Conic

The probability of increasing severity or frequency of natural hazards could increase the risk of flooding to the City. Higher sea levels could cause Philadelphia's Delaware and Schuylkill rivers to rise (despite being 90 miles inland from the mouth of the Delaware Bay). Sea Level Rise impacts will begin with nuisance flooding from high tide and smaller rain events and continue until low lying areas of the City are permanently inundated with water.

An increase in temperature will result in more frequent and intense rainfall events. Total annual precipitation is projected to increase from 44" between 1950-1999 to about 47-49" by mid-century, and 49-50" towards the end of the century. All seasons are projected to experience increasingly wetter futures. The largest three-day winter precipitation event is projected to get heavier over the coming century from a 2" event in 1950-1999 to a 2.5-2.7" event in mid-century and a 3.0-3.3" event towards the end of the century. As temperatures warm, precipitation will shift from snow to rain/mixed conditions. Daily precipitation projections were processed across 4 grid cells over Philadelphia for a moderate future warming scenario (RCP4.5) and the high future warming scenario (RCP8.5) across two sets of models.

Table 37: Historical and projected precipitation indicators for Philadelphia

	Observed (1950-1999)	Projections for 2040- 2059	Projections for 2080-2099
Average annual precipitation (inches)	44.0	47.3 - 48.1	49.2 - 49.9
Winter precipitation (inches)*	9.9	11.0 - 11.4	11.7 - 12.6
Largest 3-day precipitation event - Winter (inches)	2.0	2.5 - 2.7	3.0 - 3.3
Spring precipitation (inches)	11.4	11.9 - 11.5	11.9 - 12.3
Summer precipitation (inches)	12.2	13.1 - 13.3	13.3 - 14.0
Fall precipitation (inches)	10.5	10.9 - 11.3	11.0 - 11.3

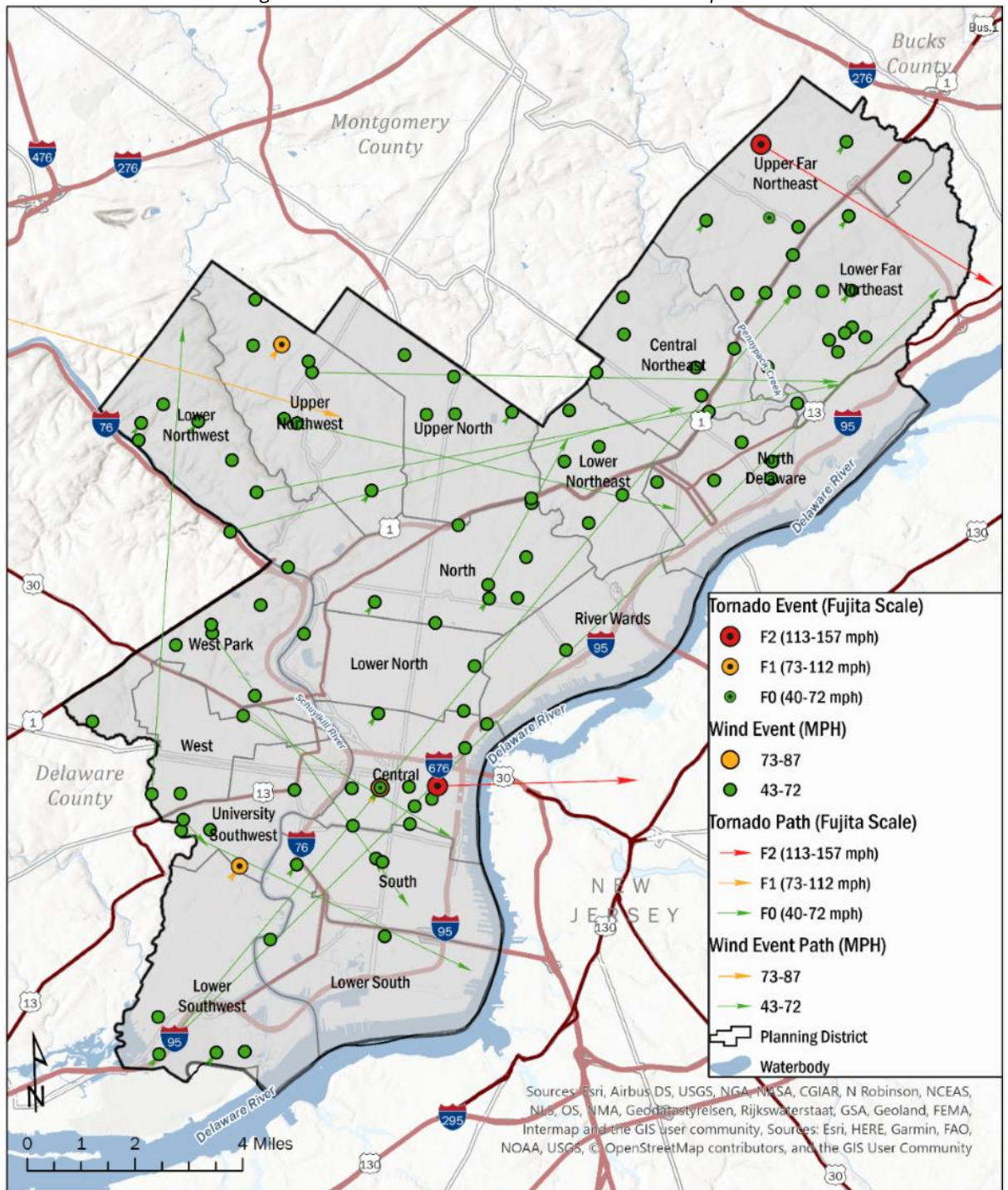
2.5.4 Tornadoes/Windstorms

Windstorms and tornadoes can occur anywhere throughout Philadelphia. Damaging winds exceeding 50-60 miles per hour can occur during tornadoes, severe thunderstorms, winter storms, or coastal storms. These winds can have severe impacts on buildings, pulling off the roof covering, roof deck, or wall siding and pushing or pulling off the windows (PEMA, 2020). Gusts and sustained winds can cause damage to trees through fallen and downed limbs. Fallen trees and limbs can partially block waterways, affecting turbidity if the downed tree is large enough, or the tributary small enough. High winds can also cause erosion of topsoil if the soil is dry or loose enough. Additionally, high winds can spread trash and debris over a large area, complicating clean-up efforts.

Additionally, windstorms and tornadoes can also impact local waterways. Tornadoes, should they damage chemical facilities or other facilities where chemicals are stored, can release hazardous materials into the ground, water, or air. The destruction of homes or businesses where asbestos or lead is present can also affect local health.

Between 1955 and 2019, there were 197 documented windstorms and tornadoes in Philadelphia (NOAA, 2020). These windstorms have injured individuals, damaged buildings and vehicles, downed trees and power lines, and disrupted transportation, communications, and power services. Since 1955, seven wind events classified as tornadoes directly impacted Philadelphia, all being classified an EF2 or weaker. Additionally, during Hurricane Ida in September 2021, seven tornadoes touched down throughout southeastern Pennsylvania and southern New Jersey (ABC, 2021).

Figure 18: Tornado and Windstorm Events in Philadelphia



TORNADO AND WINDSTORM EVENTS (1955-2019) CITY OF PHILADELPHIA



February 28, 2022
Spatial Reference
Name: NAD 1983 StatePlane Pennsylvania South FIPS 3702 Feet
GCS: GCS North American 1983
Datum: North American 1983
Projection: Lambert Conformal Conic

Severe windstorms and tornadoes pose a significant risk to life and property in Philadelphia by creating conditions that disrupt essential systems such as public utilities, telecommunications, and transportation routes. Fallen trees and debris are common after high wind events, which can block access to roads, bring down power and utility lines, and damage building stock. Areas with tall buildings, such as Center City and University City, are at greater risk as increased wind pressure occurs at greater heights. Construction sites are also especially vulnerable to high winds. Loose tools and construction materials, cranes, and scaffolding may loosen from exposure to high winds and become flying debris.

Tornados and windstorms also increase the risk of building collapse. Factors that increase risk of a building collapse during high wind events include building age, vacancy rate, and status as an imminently dangerous structure. Thirty-nine percent of Philadelphia's properties were built before 1939. The North and West planning districts are the next most populated with older buildings. Vacant properties also increase the risk of a building collapse because these properties fall into disrepair and neglect. Philadelphia has a higher percentage of vacant properties than the national average, with 12.3% of properties vacant as of 2019 census five-year estimates. Most areas in Philadelphia with a large percentage of vacant properties align with neighborhoods identified by the CDC as having high social vulnerability.

Populations in Philadelphia that are at a greater risk to the impacts of windstorms and tornadoes include, but are not limited to, adults 65 years and older (13.4% of the population), children under the age of 5 (6.7%) of the population, individuals living below the poverty line (23.3% of the population) (U.S. Census Bureau, 2019), individuals who are unsheltered, individuals who experience language and communication impediments (24.1% of the population over age 5 primarily speaks a language other than English), and individuals needing support with functional needs and activities of daily living. Individuals that rely on electricity for life-sustaining equipment are also more at-risk during these events due to the high likelihood of utility disruptions associated with windstorms and tornadoes.

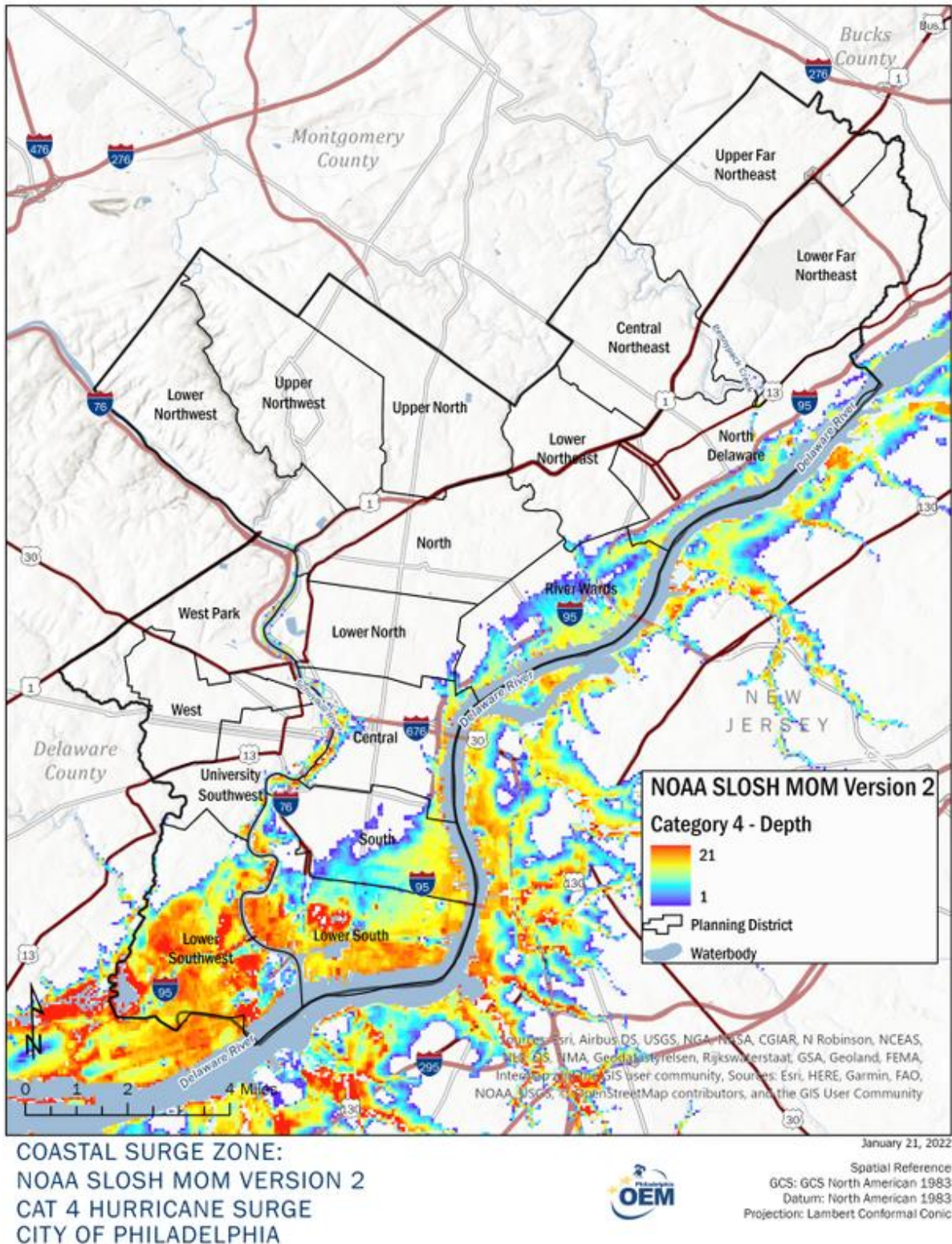
2.5.5 Hurricanes/Tropical Storms/ Nor'easters

Hurricanes, tropical storms, and nor'easters are classified as cyclones and are any closed circulation developing around a low-pressure center in which the winds rotate counterclockwise (in the Northern Hemisphere) and whose diameter averages 10-30 miles across. Potential threats from hurricanes include powerful winds, heavy rainfall, storm surges, coastal and inland flooding, rip currents, tornadoes, and landslides.

Philadelphia is situated in an area where cyclones can track inland causing heavy rain, strong winds, and storm surge in low-lying areas along tidal waterways. All cyclones are regional events that can affect an area hundreds of miles long; therefore, all neighborhoods within Philadelphia are subject to the impacts of these storms. However, certain factors such as proximity to tidal waterways like the Delaware and Schuylkill rivers may make some areas more vulnerable to specific effects, including storm surge. Storm surge is a hazard unique to

cyclones that can severely impact structures near tidal waterways. This type of flooding can cause destruction of buildings as well as utility and transportation infrastructure.

Figure 19: Hurricanes/Tropical Storms/Nor'easters in Philadelphia



The following table lists the ten most destructive hurricanes and tropical storms of the past 100 years in terms of damage estimates and loss of life with centers of circulation passing within 65 miles of Philadelphia. Note that the storms are listed in chronological order.

Table 38: Ten Most Destructive Tropical Cyclones in Philadelphia (Since 1920)

Year	Storm Name	Peak Intensity	Strength Near Philadelphia	Impacts and damage in Philadelphia
2021	Ida	Category 4	Tropical Storm	<ul style="list-style-type: none"> • Extreme flooding along the Schuylkill River, cresting at 16.35ft. and causing substantial damage in nearby areas such as Manayunk. • The crest was only exceeded once in history when the river reached 17ft. in 1869. • Five deaths in the Philadelphia region • Multiple tornadoes across the region, including an EF3 storm in Mullica Hill, NJ
2020	Isaias	Category 1	Tropical Storm	<ul style="list-style-type: none"> • A total of 4.16 inches of rainfall was reported at the Philadelphia International Airport. • The Delaware river reached minor flood stage, cresting at 9.13 feet. • The Schuylkill River reached moderate flood stage, cresting at 12.28 feet. • Significant flooding to homes and businesses in Southeast and Northwest Philadelphia resulted, with storm impacts that necessitated emergency evacuations and temporary sheltering.
2012	Sandy	Category 3 Hurricane	Category 1 Hurricane	<ul style="list-style-type: none"> • Two deaths and \$20 million in damage • 850,00 customers without power • Flooding along the Delaware River • Suspended Amtrak and SEPTA service • Closed major highways across the region
2011	Irene	Category 2 Hurricane	Tropical Storm	<ul style="list-style-type: none"> • Flooded Manayunk and Lincoln Drive along the Schuylkill, with a 13.5 ft. crest recorded • The Delaware River recorded a 9.77 ft. crest • Caused seven structure collapses and damaged at least thirteen others
2011	Lee	Tropical Storm	Tropical Storm	<ul style="list-style-type: none"> • One fatality in Philadelphia • Rockslides and widespread flooding and flash floods • Destroyed 22 homes and businesses with hundreds more affected
1999	Floyd	Category 4 Hurricane	Tropical Storm	<ul style="list-style-type: none"> • Eight deaths in Philadelphia • 2.8 ft. Storm surge recorded • 3,500 homes flooded and 1,000 people evacuated

1972	Agnes	Category 1 Hurricane	Tropical Storm	<ul style="list-style-type: none"> Three deaths in Philadelphia Major flooding on the Schuylkill River
1955	Connie	Category 1 Hurricane	Tropical Storm	<ul style="list-style-type: none"> Evacuations Flooding along the Delaware River
1955	Diane	Category 1 Hurricane	Tropical Storm	<ul style="list-style-type: none"> Flooding along the Delaware River Heavy runoff led to extensive downstream flooding along rivers and streams
1954	Hazel	Category 4 Hurricane	Tropical Storm	<ul style="list-style-type: none"> Substantial wind impact 94 mph gust recorded
1933	Unnamed	Category 4 Hurricane	Tropical Storm	<ul style="list-style-type: none"> Major flooding along Schuylkill River Major road and highway damage

Hurricanes, tropical storms, and nor'easters are associated with damage from sustained winds as well as wind gusts. Wind can cause damage to trees that can partially block waterways, affecting turbidity if the downed tree is large enough, or the tributary is small enough. High winds can also cause erosion of topsoil if it is dry or loose enough and can spread trash and debris over a large area, complicating cleanup efforts. Nor'easters can sometimes also result in substantial snow accumulations, causing tree damage that can lead to other impacts like impassable roadways and downed electrical wires. Cyclones can lead to flooding from storm surge as well as riverine flooding and flash floods from heavy rainfall. The high winds in hurricanes and tropical storms can cause utility outages that impact people that need electricity for medical devices and to keep temperatures comfortable in their homes. Populations that are low- to moderate-income can have more difficulty recovering from disaster events including hurricanes and connecting with resources to assist their recovery.

2.5.6 FEMA Community Lifelines and Indispensable Services

A community lifeline is an indispensable service that enables the continuous operation of critical business and government functions and/or are critical to human health and safety and economic security. A **critical facility** is a facility that provides services and functions essential to a community, especially during and after a disaster.

In the Pennsylvania Hazard Mitigation Plan (2018), the Pennsylvania Emergency Management Agency (PEMA) identified 618 critical facilities in the City of Philadelphia. A full list of state-identified critical facilities for Philadelphia can be found in the following table.

Table 39: Total Critical Facilities in the City of Philadelphia¹

	# Critical Facilities in Philadelphia	# Critical Facilities in Pennsylvania
Agriculture	41	275
Banking	1	3
Commercial	8	27
Communication	35	615

Dam	19	3,429
Education (Colleges and Universities)	21	159
Education (Public Schools)	339	3,175
Emergency Operation Centers	1	69
Energy	4	55
Fire Stations	66	2,708
Government	2	25
Hospitals	41	342
National Monuments or Icons	3	6
Nuclear	0	5
Police Stations	31	1,245
Transportation	10	75
Water	3	1,798
TOTAL:	618	14,011

As part of Philadelphia's last Hazard Mitigation Plan update, the city assessed risk to 6 essential categories of critical facilities including: Emergency Operations Centers, 911 centers, fire stations, hospitals, police stations and schools. Modeling was performed to identify which of these critical facilities would be most impacted by a 1% Annual Chance Flood. The following table identified the number of critical facilities analyzed that are expected to sustain damage following a 1% annual chance flood event.

Table 40: Expected Damage to Critical Facilities in the 1% Annual Chance Floodplain ²

Critical Facility	Total	Expected to Sustain Damage
Emergency Operations Center + 911 Centers	3	0
Fire Stations	65	2
Hospitals	38	0
Police Stations	36	0
Schools	577	16

The City's hazard mitigation goals include building resilience of all critical community assets, including property, infrastructure, and cultural resources.

2.5.7 Summary of Mitigation Unmet Needs

This assessment highlights four priority areas that fall under Philadelphia's unmet mitigation needs. Top mitigation priorities include 1) Extreme Temperatures; 2) Flooding; 3) Tornadoes and Windstorms; and 4) Hurricanes, Tropical Storms, and Nor'easters. While flooding remains one of Philadelphia's greatest natural hazard risks, mitigating these additional hazards will increase the city's resilience to storms like Hurricane Ida.

Philadelphia's Hazard Mitigation Plan identifies numerous actions that can address vulnerabilities within MID areas related to the above natural hazard risks. With subject matter expertise from the City's Flood Risk Management Task Force, these mitigation actions have been organized into broader programmatic goals which bolster the resilience of communities and public infrastructure; support mitigation planning efforts; and fund the non-federal cost share for relevant federal flood mitigation and resilience grant programs.

Resilient Public Infrastructure

Many public assets across the city are vulnerable to flooding beyond the impacts experienced as a result of Hurricane Ida. These assets include critical infrastructure such as stormwater, wastewater, and transportation systems; highway and roadway networks; and flood risk reduction infrastructure. To minimize future flood damage, mitigation funds must support resilience improvements to existing infrastructure (e.g., water treatment plants), and fund additional risk reduction infrastructure projects (e.g., stormwater tunnels, pumps, etc., levees, berms, sea walls). This program will function similar to FEMA's BRIC grant program to support the following activities:

- Capability and capacity building (C&CB) activities
- Mitigation projects
- Management costs

Resilient Households

Funding community-wide initiatives is essential to reducing the magnitude of flood damage and protecting human health and safety. While many larger-scale infrastructure investments can reduce risk, a critical gap the City has identified remains in household-level preparedness and resilience. This program will function similar to FEMA's Flood Mitigation Assistance (FMA) program to support projects that reduce or eliminate the risk of repetitive flood damage to buildings through:

- Project Scoping
- Technical Assistance
- Community Flood Mitigation Projects
- Individual Structure/Property-Level Flood Mitigation Projects
- Management Costs

Projects must be cost effective, align with the applicable hazard mitigation plan, and meet all environmental and historic preservation (EHP) requirements. Unlike FMA, which requires property owners to hold flood insurance policies through the National Flood Insurance Program (NFIP) at the time of application, this program will be open to all households which have experienced or will experience flooding. While there are many NFIP policies in areas with high flood risk and repetitive losses in Philadelphia, insurance premiums remain a limiting factor for many; the City acknowledges that property owners who cannot afford

insurance are excluded from critical mitigation programs. This program will help property owners reduce their flood insurance premiums through eligible mitigation activities. Importantly, properties mitigated with CDBG-DR funds will be required to maintain an NFIP policy in perpetuity but may be better positioned to do so with mitigation actions supported by this program.

Mitigation Planning

The Task Force has identified various mitigation planning needs which align with ongoing local initiatives and will ultimately make the city more resilient to future flooding events. These initiatives include Philadelphia Water Department's climate adaptation work, the Lower South Infrastructure Resilience Collaborative, Philadelphia City Planning Commission's comprehensive plan, community-led resilience plans, the next Hazard Mitigation Plan update, and various multi-municipal and -agency coordination efforts. CDBG-DR mitigation funds can support the generation, updating, and alignment of plans that are rooted in flood resilience.

Non-Federal Cost Share/Local Match

Offsetting the burden of non-federal cost share to the City, as well as extending mitigation impacts supported by CDBG-DR, is an essential eligible activity of the mitigation set-aside. This program will fund local match requirements of in-progress and future grant applications to FEMA's HMA programs, Bipartisan Infrastructure Law (BIL) programs, and Congressional Delegated Spending for Pre-Disaster Mitigation (CDS-PDM). Eligible projects are those eligible under aforementioned programs, must also be CDBG-DR eligible, and meet a national objective.

SECTION 3. GENERAL REQUIREMENTS

3.1 Citizen Participation

3.1.1 Outreach and Engagement

The City recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this Action Plan. In the development of this Action Plan, the City consulted with disaster-affected residents, stakeholders, local public agencies, public housing authorities, State agencies, and other affected parties in the surrounding geographic area. In doing so, the City ensured that the Action Plan was consistent with the disaster impacts, comprehensive, inclusive, and reflective of input. There were many forms of outreach used to maximize resident feedback into the plan, including in-person or virtual meetings, social media posts from official city and other accounts, and advertisements in legacy media outlets.

In addition to using a variety of outreach approaches, the City of Philadelphia is committed to following the Language Access Plan to ensure that the Action Plan, substantial amendments, and other relevant program materials are accessible to persons with disabilities and individuals with Limited English Proficiency. Interpretive services are available via telephone or in-person upon request. Individuals are also able to request interpretive services for future events as well as translation services for documents and signage upon request. A summary of this Action Plan was made available online in Spanish, Chinese, Haitian Creole, Portuguese, and Vietnamese in order to increase language accessibility of materials.

Any implementing agencies, subrecipients, and other entities participating in CDBG-DR-funded activities must accommodate the functional needs of disabled individuals and persons with Limited English Proficiency, in line with the Language Access Plan.

Table 41: List of Local Public Agencies and Stakeholders Consulted and/or Briefed

Outreach to Federal, State , and Local Public Agencies/Stakeholders	
City CDBG-DR Steering Committee <ul style="list-style-type: none"> • Office of the Director of Finance (Finance) • Division of Housing and Community Development (DHCD) • Managing Director's Office (MDO) including the Office of Emergency Management (OEM), Philadelphia Water Department (PWD), Office of Transportation and Infrastructure Systems (OTIS) • Office of Sustainability (OOS) • Philadelphia Parks and Recreation • Philadelphia City Planning Commission (PCPC) • Mayor's Office • Department of Commerce • Philadelphia City Council, Office of the Council President 	<ul style="list-style-type: none"> • 04/05/2023 • 04/19/2023 • 05/03/2023 • 05/17/2023 • 06/14/2023 • 07/12/2023 • 08/16/2023 • Ongoing

<p>Philadelphia Flood Risk Management Task Force, including but not limited to:</p> <ul style="list-style-type: none"> • OOS • OEM • PWD • PCPC • Department of Licenses and Inspections (L&I) • Department of Public Property (DPP) • Department of Public Health (PDPH) • Department of Aviation (DOA) • Office of Risk Management 	<ul style="list-style-type: none"> • 03/23/2023 • 06/13/2023 • 07/17/2023 • Ongoing
<p>Eastwick Intergovernmental and Interagency Meetings, including but not limited to:</p> <ul style="list-style-type: none"> • OOS • OEM • PWD • OTIS • PCPC • Philadelphia Housing and Community Development Corporation (PHDC) • Pennsylvania Emergency Management Agency (PEMA) • FEMA, Region 3 • U.S. Army Corps of Engineers, Philadelphia District • Environmental Protection Agency (EPA) • U.S. Department of Housing and Urban Development (HUD) • U.S. Fish and Wildlife Service • Office of Congresswoman Mary Gay Scanlon • Office of State Senator Anthony H. Williams • Office of State Representative Regina Young • Office of Council President Kenyatta Johnson 	<ul style="list-style-type: none"> • 03/17/2023 • 06/02/2023 • 07/28/2023 • 06/30/2023 • Ongoing
<p>Hazard Mitigation Steering Committee, including but not limited to:</p> <ul style="list-style-type: none"> • OEM • OOS • PCPC • OTIS • Department of Commerce • PDPH • Philadelphia Fire Department (PFD) • Philadelphia Police Department (PPD) 	<ul style="list-style-type: none"> • 04/17/2023 • 07/28/2023 • Ongoing
<p>Hazard Mitigation Plan 2023 Annual Review Workshop, including but not limited to:</p> <ul style="list-style-type: none"> • OEM • OOS • PWD 	<ul style="list-style-type: none"> • 3/30/2023

<ul style="list-style-type: none"> • Department of Streets • PPD • PFD • PCPC • DOA • PDPH • FEMA • Office for People with Disabilities • School District of Philadelphia • Philadelphia Industrial Development Corporation (PIDC) • Delaware Valley Regional Planning Commission (DVRPC) • PennDOT, District 6 • U.S. Coast Guard Delaware Bay 	
Department of Public Property	5/8/2023
Division of Aviation	5/8/2023
Office of Homeless Services (OHS)	4/24/2023
Department of Streets	4/14/2023
PA Department of Community and Economic Development (DCED)	3/28/2023
PennDOT	5/1/2023
SEPTA	4/25/2023
FHWA	5/2/2023
John Heinz National Wildlife Refuge	4/21/2023 and Ongoing
Amtrak	5/10/2023

Table 42: List of Community Based Organizations Consulted and/or Briefed

Outreach to Community Based Organizations	
Enterprise Center CDC	8/21/2023
GPASS Neighborhood Advisory Committee	8/16/2023
Strawberry Mansion CDC	8/10/2023
Affirmatively Furthering Fair Housing Stakeholder Group	8/7/2023 8/14/2023
Hunting Park Neighborhood Advisory Committee	7/27/2023
Hispanic Alliance for Career Enhancement (HACE) CDC	7/26/2023
Housing Security Working Group	7/11/2023
Eastwick United	5/11/2023
Philanthropy Network Greater Philadelphia	5/2/2023
PA Voluntary Organizations Active After Disasters (VOAD)	4/20/2023 and Ongoing
Philadelphia Association of Community Development Corporations (PACDC)	7/14/2023
Community Legal Services (CLS)	8/14/2023
Manayunk Development Corporation	8/7/2023 and Ongoing
East Falls Development Corporation	Ongoing
Fairmount Park Conservancy	3/30/2023
University of Pennsylvania – Public Health Program	3/30/2023
The Nature Conservancy	3/30/2023

Southeast Healthcare Coalition	3/30/2023
Temple University	3/30/2023
The Arc of Philadelphia	3/30/2023
Children's Hospital of Philadelphia (CHOP)	3/30/2023
PECO	3/30/2023

Philadelphia Voices Survey

In late June 2023, the City administered the Philadelphia Voices Survey to better understand the remaining unmet needs in the aftermath of Hurricane Ida. In order to gather significant results and a representative sample of residents, the Philadelphia Voices Survey was offered via online form, interactive voice response phone call, and text message. In total, there were **801** survey respondents - 49% completed the survey via the text message option, 31% via online form, and 20% via phone call.

The survey had a margin of error of +/- 2.45% and yielded interesting results. The self-expressed racial and ethnic identification of survey participants generally matched greater city trends, with **41%** identifying as black, **40%** as white, **15%** as Hispanic ethnicity, and **9%** as Asian American and Pacific Islander (AAPI). Additionally, the age demographics for the survey sample followed greater city trends, with a plurality of respondents ranging from 35-64 years old.

Overall, **22%** of respondents expressed being impacted in some way by Hurricane Ida in 2021. **8%** of overall respondents experienced home or property damage, **7%** experienced damage to public infrastructure in their community, **2%** were displaced from their home, and **2%** had their job or business impacted. The majority of respondents who were impacted by Ida were from either West Philadelphia (**27%**) or North Philadelphia (**25%**), consistent with city data on most impacted communities.

Many differences along racial lines were not significant given the margin of error for survey, but one data significant data point is that white respondents were the least likely group to experience impact – **15%** compared to **22%** for both Black and Latine residents. There are also two data points of significance regarding income level. Respondents in the \$50k-\$74k income range were most likely to be affected by Ida (**27%** of the respondents in that income range), while residents in the \$25k-\$49k income range were least likely to be affected by Ida (**15%**). The <\$25k, \$75k-\$124k, and >\$125k income groups all had similar percentages of Ida-impacted residents (**≈20%**).

Among residents impacted by Ida, **35%** identified housing assistance to reduce flood risk as their top priority, **29%** identified infrastructure improvements as their top priority, and **18%** had housing recovery as their top Ida recovery priority. These resident desires are reflected in the funding allocations under the CDBG-DR Action Plan, further illustrating the prioritization of resident feedback throughout the process.

Post Disaster Outreach

Immediately following the storm event, the City of Philadelphia launched a multi-agency and multi-pronged (phone calls, text messages, online, door-to-door visits) outreach, canvassing, and recovery effort that not only linked impacted residents with crucial services and resources but also provided the City with data regarding impact and need.

Damage Assessment Process

Immediately after the storm, businesses and residents were encouraged to report damages through Philadelphia Office of Emergency Management's (OEM) online public damage assessment survey and through Philly 311, which included interpretation services for non-English speaking businesses and residents. OEM's public damage survey was heavily advertised via City blog posts, social media, OEM's mass notification system (READYPhiladelphia) and through Philly 311. A total of 290 reports of damage from affected individuals and businesses in the City were submitted.

The City requested additional support conducting a preliminary damage assessment through the Pennsylvania Emergency Management Agency (PEMA). As a result, the Civil Air Patrol was deployed to the City of Philadelphia to conduct door-to-door outreach and to coordinate a fly over of the impacted area.

The data gathered through the preliminary damage assessment was used to inform a more in-depth, joint damage assessment with the Pennsylvania Emergency Management Agency (PEMA), FEMA, the Small Business Association (SBA) and local officials on Sunday, September 5th and Tuesday, September 7th to verify damage. A total of 193 residential structures were assessed during the joint damage assessment. Nine properties were destroyed, and 55 properties sustained major damages. An additional 105 properties sustained minor damage and 24 were affected by the storm. The properties assessed through the joint damage assessment are not inclusive of all impacted properties and represent only those properties that damage assessment teams evaluated during the two-day process.

Table 43: Joint Damage Assessment of Residential Properties

Level of Damage	Number of Properties
Affected	24
Minor	105
Major	55
Destroyed	9
Total	193

A joint damage assessment of public infrastructure was conducted on September 20th to assess impacts to City infrastructure. Teams toured properties and infrastructure owned and managed by Philadelphia Parks and Recreation (PPR), Philadelphia Water Department

(PWD), and the Department of Public Property (DPP). Eleven departments initially reported damage and costs relating to Ida.

Residential Outreach

On September 10, 2021 and September 11, 2021, the Philadelphia Office of Emergency Management (OEM) opened a Multi-agency Resource Center (MARC) at the Gustine Recreation Center in East Falls to identify and assist residents with unmet needs. A MARC is a common location where residents impacted by the storm can go to report damages and access recovery resources. The following agencies were present:

- City agencies:
 - Philadelphia Office of Emergency Management (OEM)
 - Philadelphia Water Department (PWD)
 - Philadelphia Commerce Department
- State agencies:
 - Pennsylvania Emergency Management Agency (PEMA)
 - Pennsylvania Department of Human Services (PADHS)
 - Pennsylvania Department of Health (PA DOH)
 - Pennsylvania Department of Transportation (PennDOT)
 - Office of the Attorney General (OAG)
- Federal agencies:
 - Environmental Protection Agency (EPA)
- Volunteer organizations:
 - American Red Cross (ARC)
 - Salvation Army
 - Southeastern Pennsylvania Voluntary Organizations Active in Disaster (SEPA VOAD)

Following the Major Presidential Disaster Declaration for Philadelphia County on September 10, 2021, Philadelphia OEM supported the activation of a FEMA Disaster Recovery Center (DRC) and a Small Business Association (SBA) Business Recovery Center (BRC).

The DRC, located in the Roxborough neighborhood of Philadelphia, was open from September 27, 2021 through November 13, 2021 and provided one-on-one support accessing federal and state recovery resources and applying for FEMA's disaster assistance and SBA's low interest loans. The site was operated by FEMA, with support from Philadelphia OEM.

Business Outreach

Following the Major Presidential Disaster Declaration for Philadelphia County on September 10, 2021, a workgroup was established to focus on private-sector recovery. The workgroup consisted of representatives from the Commerce Department, OEM, PEMA, FEMA, and SBA,

and met weekly to share information on unmet needs of the business community and to coordinate recovery resources.

Philadelphia OEM and the Commerce Department supported activation of a Small Business Association (SBA) Business Recovery Center (BRC) at the Falls of Schuylkill Library from September 15, 2021 through December 10, 2021. The BRC provided one-on-one assistance with submitting disaster loan applications to over 60 Philadelphia businesses and homeowners.

The Philadelphia Commerce Department also conducted outreach to the business community through participation in a series of meetings with impacted business development corporations throughout Fall 2021. Meetings focused on gathering details related to unmet needs and connecting businesses with recovery resources.

Additionally, the Commerce Department provided approximately \$300,000 in City funds to The Merchants Fund to expand their mini-grant program for flood-damaged businesses. Commerce's funding allowed the pro's Fund to expand benefits from 15 grants worth \$2,000 to approximately 62 grants totaling \$328,000. The average grant was \$5,290. Applicants reported approximately \$6.75 million in damage total.

The Temple University Small Business Development Center (Temple SBDC), hosted at the Fox School of Business and Management at Temple University, was also available to support businesses seeking SBA disaster loan recovery resources. Interested businesses were paired with a consultant who assisted them at no cost and helped them understand the qualifications and application process.

Eastwick Community Engagement

Eastwick is a community in Southwest Philadelphia facing multiple legacy and ongoing environmental burdens including a federally designated Superfund site (Clearview Landfill), the largest oil refinery on the Eastern Seaboard (now shuttered), and noise and air pollution from major highways (I-95 and I-76) and the Philadelphia International Airport. The scars of a failed urban renewal project from the late 1950s permeate today through large swaths of vacant land with unfinished roads and infrastructure leading to cement barriers and invasive vegetation, attracting short dumping and abandoned vehicles. One of the most significant environmental challenges in Eastwick is flooding; Eastwick is the lowest lying neighborhood in Philadelphia and has historically experienced severe riverine flooding but is vulnerable to multiple sources of flooding due to its location. The Cobbs and Darby Creeks converge in Eastwick, carrying fast, forceful water from upstream in the watershed, which lies largely outside of the Philadelphia County boundaries. During coastal storms, like Hurricane Ida, water levels in the Delaware and Schuylkill Rivers rise, which in future storms may come up through the Darby Creek and flow overland into Eastwick. Sea level rise will make it harder for water to drain and may eventually cause water to pond in some areas, even on sunny days.

In 2022, the City initiated a place-based program called “[Eastwick: from Recovery to Resilience](#)” to align City, State and Federal efforts to improve community well-being in Eastwick through actions informed by Eastwick’s history, present context, and residents’ vision for a resilient future. Through this initiative and with deep collaboration with Eastwick community leaders and agency partners, the City has identified priority areas for short and long term investment and action. These priorities were further verified in a May 2023 focus group around unmet needs. Based on ongoing engagement, priorities include:

- Prevention
 - Interim Measures for the Neighborhood: Evaluate the feasibility and accelerate implementation of an interim flood barrier to provide short-term relief from riverine flooding.
 - Interim Measures for Households: Support and seek funding for household flood resilient retrofits, such as elevating utilities, procuring flood resilient materials, and installing flood vents.
 - Long-term Measures: Develop a community-driven strategy for long-term flood resilience (currently funded by FEMA Flood Mitigation Assistance) to decide what flood mitigation measures (levee, buyouts, relocation, etc.) align with Eastwick residents’ vision for the future of their community.
- Preparedness
 - Evacuation Planning: Improve communication of evacuation plans and protocols before the storm. Provide additional evacuation support and communication for residents experiencing disability, elderly residents, residents with pets, and new residents.
 - Infrastructure Preparedness: Ensure all storm drains in Eastwick are cleaned regularly and ahead of storm events. Improve transparency and accountability of when and how often storm drains are cleaned.
- Recovery
 - Flood Insurance: Explore programs to make flood insurance more affordable for existing residents, such as subsidies, group flood insurance programs, or parametric flood insurance. Improve communication about flood insurance, including what measures result in flood insurance premium reductions,
 - Holistic Recovery: Support households experiencing gaps in recovery and insurance programs, such as asbestos removal, subsidence issues causing structural damage, legacy soil contamination, and other unanticipated challenges to making a full recovery.
 - Capacity Building: Invest resources in community organizations and institutions that already serve as community lifelines during major events.
 - Community Health and Well Being: Support community health programs to recover from the trauma of repetitive flooding. Better understand health impacts of cumulative environmental burdens.

The City will continue to engage with Eastwick leaders and agency partners through multiple

methods of engagement, including regular interagency and stakeholder meetings, quarterly public town halls, and small group discussions and focus groups to gain insight on particular topics. Most recently, in June 2023, the City collaborated with a planning committee composed of residents, elected representatives, and agency partners, organized an Eastwick Community Day to share flood resilience resources in a family-friendly setting. Roughly 250 residents and 50 government and non-profit partners participated.

Figure 20: Eastwick Community Day



Source : FEMA

3.1.2 Public Comment Period

The City recognizes that affected stakeholders are partners in the development and implementation of this plan. The effective and meaningful engagement of affected stakeholders, including persons with disabilities, LMI individuals, racial minorities, elderly individuals, and those with limited English proficiency is critical to the success of the plan overall. On July 14, 2023, the Draft CDBG-DR Action Plan was published in a blog post on the city website linked [here](#). Additionally, there was a series of social media posts, local media pieces, and emails that advertised the Public Comment period for the plan to increase visibility and equal access to information for Philadelphia residents and stakeholders. A summary of actions taken by the City to notify affected stakeholders of the public comment period is provide below:

- **Website Postings:** Prominent Posting on the City's Website including the City's [CDBG-DR website](#), [Legal Notices webpage](#), and [blog post](#). Translated content for each posting referenced above is available on the City's website. Phila.gov uses a combination of human and smart machine translation to translate website content into Spanish and Simplified Chinese along with other languages.
- **Translated Documents:** Consistent with the City's CDBG-DR Language Access Plan, vital CDBG-DR documents were translated into Spanish, Portuguese, Chinese

(Simplified), Haitian Creole, and Vietnamese. These languages are identified by OIA as the top 5 languages most requested by residents when accessing City programs. See the City's Language Access Services [dashboard](#) for more information.

- **Newspaper Legal Advertisements:** The public comment period and public hearings were advertised in prominent newspapers, including non-English newspapers, such as the Philadelphia Daily News, Inquirer, and El Sol Latino Newspaper.
- **Email Distribution:** The City notified over 100 partners and stakeholders of the public hearing and public comment period through its housing and community development contact list. Translated statements were also included in the email message.
- **Social Media:** City staff notified residents of the public hearing and public comment period through social media platforms such as Facebook, Instagram, and Nextdoor.
- **Printed Copies:** Printed Copies, including translated summaries, were placed in the Government Publications departments of the Central, South Philadelphia, Northeast Regional, Northwest Regional and West Regional branches of the Free Library of Philadelphia.
- **NAC and Community Organization Small Group Discussions:** The City held four small group discussions with [Neighborhood Advisory Committees](#) (NACs) during the public comment period. NACs work with the City to help residents learn about City programs that could benefit them. City staff identified NACs in the most impacted zip codes according to FEMA data and held small group discussions to learn more about impacts directly from residents. This outreach is ongoing and more small group discussions are scheduled. The City will continue to work closely with NACs and community organizations to design and develop CDBG-DR programs that address the needs of residents.
- **Stakeholder Briefings:** The City held numerous stakeholder briefings to inform community members of Philadelphia's CDBG-DR allocation and the draft Action Plan. A full summary of outreach efforts in the outreach and consultation table provide above. Key stakeholder groups include the City's Affirmatively Furthering Fair Housing (AFFH) Stakeholder Group, Philadelphia's Housing Security Working Group, Eastwick Interagency and Intergovernmental Coordination meetings, Eastwick Community Stakeholder Meeting. The City will continue to work closely with stakeholder organizations to design and develop CDBG-DR programs that address the needs of residents.

Pursuant to HUD guidelines, citizens had the ability to submit written comments or via email or physical mail through August 15th, 2023. If received by August 15th, each comment or was responded to and included in the Draft Action Plan submitted to HUD. It should be noted that while HUD requires a 30-day comment period for the Draft Action Plan, city best practices call for the continued monitoring and tracking of citizen feedback throughout the lifetime of the grant. Overall, there were over **80** public comments received during the

comment period - including public hearing comments and direct email comments to the City.

A full summary of citizen comments on this Action Plan, along with City responses, is included in Section 6 of the appendix of the submitted Draft Action Plan. For more information, citizens can refer to the city Citizen Participation Plan that can be found on the City's CDBG-DR website.

3.1.3 Public Hearings

Per the Federal Register's approach for CDBG-DR grantees with allocations under \$500 million, at least one public hearing is required during the 30-day comment period.

In order to maximize the opportunity for citizens to provide feedback, the City held two public hearings on Tuesday, August 8th – one virtual and one in-person. These meetings were advertised in print and digital media as well as on social media platforms like Facebook, Instagram, and Nextdoor. Meetings were also accessible to people with disabilities, as the in-person hearing was held in an ADA compliant facility and sign language interpreters were present at both hearings. Attendees were able to notify City staff of other accommodations including translation services needed by Friday, August 4th. Information on each public hearing is below:

The In-person CDBG-DR Hearing:

Date: **Tuesday, August 8, 2023**

Time: 10am-12pm

Location: **1234 Market St., 17th Floor Philadelphia, PA 19107**

Number of Attendees: **14**

Number of Public Comments: **14**

The Virtual CDBG-DR Hearing:

Date: **Tuesday, August 8, 2023**

Time: **6pm-8pm**

Number of Attendees: **12**

Number of Public Comments: **4**

All comments during the hearings were recorded and responded to in the summary found in Section 6.3 of the appendix.

3.1.4 Complaints

Formal complaints are written statements of grievance, including email, and handwritten complaints. The City shall detail the process and contact information for submitting complaints within program guidelines, application documents, and on the City website. The City shall maintain a tracker for collecting and categorizing complaints through resolution. Responses will be provided within 60 working days of the receipt of the complaint.

The City will include a written appeals process within each set of program guidelines. The appeals processes will include, but are not limited to, the following:

- The process for submitting, tracking, and resolving a written appeal to the organization administering the program (or its subrecipient), to include whether an appeals committee will be established to review and/or rule on appeals.
- The documentation required when submitting an appeal.
- The timelines for reviewing and providing a response to the appeal.
- Clarification of what may or may not be appealed. Generally, policies that have been approved and adopted within program guidelines may not be appealed. The City and its subrecipients do not have the authority to grant an appeal to a regulatory or statutory or HUD-specified CDBG-DR requirement. Documentation must be maintained at the local level to support compliance with these requirements.

The City will accept written citizen complaints related to CDBG-DR funded programs, the Action Plan, substantial amendments, or quarterly performance reports. Written complaints should be submitted

- via email to CDBG-DR@phila.gov; or
- be mailed to:

Attn: Sabrina Maynard
Office of the Director of Finance
City of Philadelphia
1401 John F Kennedy Blvd
Suite 1400
Philadelphia, PA 19102

Verbal complaints are informal complaints. The City and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process described above.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Any fair housing complaint can be filed with HUD directly through the Fair Housing and Equal Opportunity Region 3 office, by phone at (888) 799-2085 and email at complaintsoffice03@hud.gov.

Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). The City established fraud, waste, and abuse policies and procedures that were approved by HUD in October 2023.

3.2 Public Website

The City will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes. These items are made available through the City's CDBG-DR website. Specifically, the City will make the following items available:

- The action plan created using DRGR (including all amendments);
- Each performance report (as created using the DRGR system);
- Citizen participation plan;
- Procurement policies and procedures;
- All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and
- A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, will not be posted on the website.

In addition, the City will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

The website will be available to the public and accessible to persons with disabilities. The City will take reasonable measures to ensure meaningful access to programs and activities for all individuals, including, members of protected classes, and vulnerable populations.

Reports and program information will be monitored frequently to ensure current information is displayed. At minimum, the website will be reviewed and updated quarterly. Changes to the website may only be authorized by designated personnel. The designated personnel will be responsible for testing the website to ensure all uploads are working properly and that the data is displayed correctly.

3.3 Amendments

Over time, recovery needs will change. Thus, the City will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities develop overtime an amendment may not be triggered if the program or activity is consistent with the plan. When there are changes to the sections of this action plan that rise to the level of requiring an amendment, the City will do the following:

- Ensure the current version of the Action Plan is accessible for viewing as a single document, with all amendments;
- Identify the amendments by highlighting added or changed content;
- Include tables that clearly illustrate where funds are being moved;
- Include a revised budget table that reflects all funds applicable to the amendment.

3.3.1 Substantial Amendment

Substantial amendments to the CDBG-DR action plan for both will require at least 30-days of public notice. The City has defined Substantial Amendments to the Action Plan as those proposed changes that require the following decisions:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed reduction in the overall benefit requirement
- A reallocation which constitutes a change of 25 percent or greater of a program budget

Those amendments which meet the definition of a Substantial Amendment are subject to public notification and public comment procedures. Citizens and units of local government will be provided with reasonable notice and an opportunity to comment on proposed Substantial Amendments to the Action Plan. A notice and copy of the proposed Substantial Amendment will be posted on the City's official website in adherence with the Americans with Disabilities Act and all other applicable law. The City will identify and consider potential impediments that limit or prohibit participation and will undertake reasonable measures to increase coordination, communication, marketing, targeted outreach and engagement with communities and individuals, including persons with disabilities. Copies will be provided upon request at the City, if otherwise not accessible for review by any residents. Citizens may contact the Language Access Plan Coordinator via email at CDBG-DR@phila.gov to request translation of the Substantial Amendment.

Citizens will be provided with no less than thirty (30) days to review and comment on the proposed substantial amendment. Written comments may be submitted to:

Attn: Sabrina Maynard
Office of the Director of Finance
City of Philadelphia
1401 John F Kennedy Blvd
Suite 1400
Philadelphia, PA 19102

A summary of all comments received responses will be included in the Substantial Amendment that is submitted to HUD for approval and posted to the City's official website.

3.3.2 Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the for public comment. The City will notify HUD five (5) business days before the change is effective. All amendments (substantial and non-substantial) will be numbered sequentially and posted to the website into one final, consolidated plan.

3.4 Displacement of Persons and Other Entities

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, the City and its subrecipients will coordinate with applicable agencies and entities to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and implementing regulations at 24 CFR Part 570.496(a).

These regulations and requirements apply to both property owners and tenants in the event that proposed projects cause the displacement of persons or other entities. The City will include detailed policies and procedures for when proposed programs or projects could potentially cause the displacement of people or other entities. The City also will budget to cover the costs involved in implementing those policies and procedures. Currently, it is not anticipated that proposed programs will cause displacement. The City will draw on existing Residential Anti displacement and Relocation Assistance Plans (RARAPs) and will adapt them to meet the URA, Section 104(d), and related waivers and the alternative requirements specified in the Consolidated Notice. The adapted RARAP also will be updated prior to implementing any activity with CDBG-DR grant funds.

CDBG-DR funds may not be used to support any federal, State, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. None of the currently planned projects under this Action Plan contemplate the use of eminent domain.

Any use of funds for mass transit, railroad, airport, seaport or highway projects, as well as utility projects which benefit or serve the general public (including energy-related, communication-related, water-related, and wastewater-related infrastructure), other structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107- 118) shall be considered a public use for purposes of eminent domain.

3.5 Protection of People and Property

The City will leverage CDBG-DR funds to build economic and disaster resilience into all recovery programs and activities. The Action Plan, as written, intends to promote mitigation, rehabilitation and elevation of existing structures and properties, and implement green building standards. The City and its subrecipients will ensure that all newly constructed buildings meet all locally adopted building codes, standards, and ordinances. Future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

3.5.1 Elevation Standards

For new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement of structures located in the floodplain, the City must follow the HUD requirements described below.

Table 44: Elevation Standards

Structure Type	Elevation Requirement
Located in the 100-year floodplain (1% annual chance)	
Primarily residential	Must be elevated with the lowest floor, including the basement, at least two (2) feet above the 1% annual chance floodplain elevation (base flood elevation). Must meet federal accessibility standards.
Mixed-use structures with no dwelling units and no residents below 2 feet above base flood elevation	Must be elevated or floodproofed in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or a successor standard up to at least 2 feet above base flood elevation. Must meet federal accessibility standards.

Non-residential structures including infrastructure	Must be elevated or floodproofed in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or a successor standard up to at least 2 feet above base flood elevation. Must meet federal accessibility standards.
Critical Actions, which are sites for which even a slight chance of flooding would be too great, because it might result in loss of life, injury to persons or damage to property." Critical Actions include hospitals, nursing homes, emergency shelters, police stations, utilities, etc.)	Must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)-(3) or successor standard) to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. If the 500-year floodplain is unavailable, the structure must be elevated or floodproofed at least three feet above the 100-year floodplain elevation. Must meet federal accessibility standards.
Located in the 500-year flood plain (0.2% annual chance)	
Critical Actions	Must be elevated or floodproofed (in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(2)-(3) or successor standard) to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. Must meet federal accessibility standards.

Exceptions:

Use of an alternative, FEMA-approved flood standard instead of the elevation requirements described above may be allowable when all of the following conditions apply:

- CDBG-DR funds are used as the non-federal match for FEMA assistance;
- The FEMA-assisted activity, for which CDBG-DR funds will be used as match, commenced before HUD's obligation of CDBG-DR funds to the City; and
- The City has determined and documented that the implementation costs of the required CDBG-DR elevation or floodproofing requirements are not "reasonable costs" as that term is defined in the applicable cost principles at 2 CFR § 200.404.

Cost Reasonableness

The cost to elevate properties can vary significantly and is dependent upon several factors, including, but not limited to, the number of feet a property must be elevated and the location, size, and age of the property. In some cases, it may be more expedient or cost-effective to pursue alternatives such as demolition and reconstruction, buyouts, or infrastructure improvements to reduce flood risk for an entire area. The City's policies and procedures will discuss how projects shall be evaluated for elevation and how elevation costs will be reasonably determined relative to other alternatives. For each property considered for elevation, the City (and any related subrecipients) will document decisions to elevate structures.

3.5.2 Environmental Reviews

All activities funded with CDBG-DR must complete an environmental review and are subject to 24 CFR Part 58 and the provisions of the National Environmental Policy Act of 1969. The City will ensure that the applicable environmental reviews and assessments are met and documented before the use or commitment of funds for each activity. The City or its local government subrecipients will be responsible for compliance and performance of environmental reviews. When funding is provided to a unit of local government, that local government will be considered the responsible entity and will be responsible for the environmental review with oversight by the City.

The City or its local government subrecipients will adhere to requirements established in Section III.C.5 in Appendix B of Federal Register Notices 87 FR 31636 and 88 FR 3198 titled Obligation and expenditure of funds, which requires completion of environmental requirements before the use or commitment of funds by receiving from HUD an approved Request for Release of Funds and certification (as applicable) or adoption of another Federal Agency's environmental review, approval or permit and receipt of an approved Request for Release of Funds and certification (if applicable) from HUD or the City.

3.5.3 Flood Insurance Requirements

Assisted property owners who are receiving assistance must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). The City may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. The City is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120% AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% AMI or the national median and has unmet recovery needs.

The City and its subrecipients will implement procedures and mechanisms to ensure that assisted property owners comply with all flood insurance requirements, including the purchase and notification requirements described below:

- Flood insurance purchase requirements for funds used to rehabilitate or reconstruct existing residential buildings in a Special Flood Hazard Area (or 100-year floodplain),
- Federal assistance to owners remaining in a floodplain.
- Prohibition on flood disaster assistance for failure to obtain and maintain flood insurance.
- Prohibition on flood disaster assistance for households above 120% of AMI for failure to obtain flood insurance.
- Responsibility to inform property owners to obtain and maintain flood insurance.

3.5.4 Construction Standards

The City will require quality inspections and code compliance inspections on emphasis on high quality, durable, sustainable, and energy efficient construction methods and materials. Site all projects to ensure quality and compliance with building codes. The City will coordinate with localities to expedite the inspection and permitting process.

The definition of substantial damage is defined in 44 CFR 59.1 and applies to any reconstruction, rehabilitation, addition or other improvement to a structure, the total cost of which equals or exceeds 50% of the market value of the structure before the start of construction of the improvement.

All rehabilitation, reconstruction, or new construction of residential structures must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

The City will ensure that all multi-family housing subsidized with CDBG-DR assistance meet Americans with Disabilities Act (ADA) and federal accessibility requirements. By adopting this standard across its programs, the City will help increase the availability of accessible housing to meet the current and future needs of older adults and people living with disabilities. This

will increase opportunities for households to age in place and build in increased community resiliency for individuals with disabilities.

For rehabilitation of non-substantially damaged residential buildings, the City will follow the guidelines to the extent applicable as specified in the HUD CPD Green Building Retrofit Checklist. When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, the City will encourage, to the extent practicable, implementation of HUD Green Building standards.

3.5.5 Contractors Standards

Contractors selected under the City will make every effort to provide opportunities to low and very-low income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community.

The City will undertake the following efforts to help meet its Section 3 goals:

- Ensure that Section 3 requirements are outlined in all applicable contracts and subrecipient agreements.
- Build the capacity of stakeholders, including subrecipients and contractors, to meet Section 3 standards through technical assistance, tools, and guidance.
- Designate a Section 3 coordinator who will manage, support, and facilitate an effective Section 3 program, and who will be able to effectively communicate program requirements to stakeholders.

Recovery programs implemented by the City and its subrecipients will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. As required in 2 CFR 200.321, the City will take appropriate steps to assure minority owned businesses and women's business enterprises are considered when possible. Those steps include:

- Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the U.S. Department of Commerce; and

- Requiring the prime contractor, when subcontracting, to take the steps listed above.

All contractors must also possess all applicable local and state licenses. Construction contractors will be required to carry the required licenses and insurance coverage(s) for all work performed, and contractors will be required to provide a warranty period for all work performed.

All contractors and any potential contractors must not be on the U.S. Department of Housing and Urban Development (HUD) lists of contractors debarred or not approvable for prior noncompliance with HUD requirements.

Contractor standards, warranty periods, and warranty notification periods will be detailed in the respective policies and procedures documents and will pertain to the scale and type of work being performed, including the controls for ensuring that construction costs are reasonable and consistent with market costs at the time and place of construction.

Rehabilitation contract work provided through a program administered by the City included in this Action Plan may be appealed by homeowners and small businesses (if applicable) whose property was repaired by contractors under the City's control.

The processes for homeowners to submit appeals for rehabilitation work, as well as complaints such as contractor fraud, poor quality work, and associated issues, will be detailed within each respective set of program guidelines expanding upon or utilizing the City's existing policies and procedures.

3.5.6 Preparedness, Mitigation, and Resiliency

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks. When implementing specific projects that involve construction, reconstruction, or rehabilitation of residential or non-residential structures, the City will establish resilience performance metrics for the relevant activity, including: (1) an estimate of the projected risk to the completed activity from natural hazards (2) identification of the mitigation measures that will address the projected risks (e.g., using building materials that are able to withstand high winds), and (3) an assessment of the benefit of the grantee's measures through verifiable data.

3.5.6.1 Design Programs Protecting People and Property from Hardship

All CDBG-DR construction activities will include measures to increase resilience to future disasters and reduce or eliminate the long-term risk of life, injury, damage to and loss of property, and suffering and hardship. All activities should consider the following resiliency measures:

- Considering whether properties have sustained repetitive losses before committing program funds for rehabilitation and, to the extent feasible and permissible, mandating that all rehabilitation activities incorporate measures to prevent repeat flooding to the level experienced during Hurricane Ida.
- Providing opportunity for tenants to relocate into safe and permanent housing.
- Prioritizing households with the following: Families with children under the age of 18, elderly households, disabled households, and veteran populations.

3.5.6.2 Emphasizing High Quality, Durability, Energy Efficiency, and Sustainability;

For rehabilitation construction, the City will follow the Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold-resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program-designated products and appliances or other equivalent.

3.5.6.3 Supporting the Adoption and Enforcement of Modern and Resilient Building Code;

The City will require all construction to adhere to the local building code to ensure compliance. Further, the City will support the enforcement of modern and resilient building codes in conjunction with the Commonwealth of Pennsylvania when appropriate.

3.5.6.4 Establishing and Supporting Recovery Efforts by Funding Feasible, Cost-Effective Measures;

The following cost-effective measures will be taken to make communities more resilient against a future disaster:

- Address a problem that has been repetitive or a problem that poses a significant risk to public health and safety if left unsolved;
- Utilize options that have been determined to be the most practical, effective, and environmental sound alternative after consideration of a range of options; and
- Contribute, to the extent practicable, to a long-term solution to the identified problem.

3.5.6.5 Making Land Use Decisions to Reduce Future Natural Hazard Risks;

The City has zoning and other building requirements that help reduce risks of impact and damage due to future hazards and disasters.

3.5.6.6 Increase awareness of hazards.

Seeking input from stakeholders and communities around the most impacted and distressed areas is an important component of the planning process. The City consulted with City departments, and the public via public hearings, on the purpose and goals of mitigation; understanding risks, threats and hazards in the City; and gathering feedback on how to craft programs that will meet the needs of the communities as quickly as possible. In addition to

gaining feedback, this process helped local stakeholders and members of the public understand what to expect from CDBG-DR funding and allowed them to play a key role in shaping the outcomes of this Plan.

3.5.6.7 Long-Term Recovery Planning

The City intends to allocate some funding toward planning activities. One of the primary purposes of the program is to promote sound, sustainable long-term recovery that accounts for an understanding of current and projected natural hazard risks. In addition to a planning program, City will fund an infrastructure program to address unmet recovery and mitigation needs associated with general infrastructure and public facilities. The grant funds will construct infrastructure that is directly benefiting individuals and the larger community. These efforts will advance the City's most recent post-disaster evaluation of hazard risks which was completed in the City's most recent Hazard Mitigation Plan.

3.5.6.8 FEMA Approved Hazard Mitigation Plan

The City's Office of Emergency Management is the lead agency for developing the City's FEMA-approved Hazard Mitigation Plan. The City's Hazard Mitigation Plan informs the larger landscape of disaster recovery planning. This Action Plan utilizes the City's Hazard Mitigation Plan to inform its mitigation needs assessment.

3.5.7 Broadband Infrastructure in Housing

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

3.5.8 Cost-Effectiveness

Program-specific policies and procedures will address the assessment of cost-effectiveness for each proposed program or activity receiving CDBG-DR funds, including housing alternatives if needed. Further, the City will follow the appropriate procurement policies to ensure selection of cost reasonable contractors to perform rehabilitation work contracted by the agency.

For purposes of the programs proposed in this Action Plan, the City will determine a structure to be "not suitable for rehabilitation" based on the determination from local building code enforcement. The City defines "demonstrable hardship" as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this

situation will be reviewed on a case-by-case basis to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include, but is not limited to, excessive amounts of debt due to a natural disaster, disability, etc.

To ensure cost reasonableness, the City will evaluate comparable costs in the local market prepared by a professional in the same field as the activity in question.

3.5.9 Duplication of Benefits

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, generally prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster for which such person, business concern, or other entity has received financial assistance under any other program or from insurance or any other source.

To comply with Section 312, the City shall ensure that each program and activity provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met.

As per the Duplication of Benefits Policy, the City and its subrecipients are subject to the requirements in Federal Register notices explaining the duplication of benefit requirement (84 FR 28836 and 84 FR 28848, published June 20, 2019, or other applicable notices). For more information, visit HUD's most recently policy for Duplication of Benefits for CDBG-DR grantees: <https://www.hudexchange.info/news/policy-for-duplication-of-benefits-for-cdbg-dr-grantees/>.

SECTION 4. GRANTEE PROPOSED USE OF FUNDS

4.1 Overview

The City of Philadelphia is the lead agency and responsible entity for administering \$163,204,000 (\$98,701,000 (2021) and \$64,503,000 (2022)) in CDBG-DR funds allocated for disaster recovery. As described throughout this document, the City consulted various parties to ensure the City's planned uses of funds are responsive to identified needs and consistent with other recovery efforts. Within the eligibility criteria of the grant, the City has prioritized the use of CDBG-DR funds for programs intended to benefit the City's most vulnerable populations and to mitigate loss of life and property in the future. The CDBG-DR grant for Ida recovery is subject to various spending thresholds and caps as described below.

- Funding must benefit the HUD-identified most impacted and distressed area (MID) which includes all of Philadelphia.
- At least \$114,242,800 (70%) must benefit low- and moderate-income (LMI) persons or areas.
- At least \$21,287,000 must be spent on mitigation activities that "increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters."
- No more than \$24,480,600 (15%) may be used for public services activities.
- No more than \$24,480,600 (15%) may be used for planning activities.
- No more than \$8,160,200 (5%) can be spent on administrative activities.

These caps are not mutually exclusive as a single project can meet multiple criteria. The programs proposed for funding include activities related to housing, infrastructure, economic revitalization, mitigation, public services, planning, and grant administration.

4.2 Program Budget

Table 45: Proposed Use of Funds

Category	Program	Budget	HUD Identified MID Budget (%)	Percent of Allocation (%)
Housing	Disaster Recovery and Resilience Program	\$42,138,100	100%	26%
Housing	Rental Rehabilitation and Repair	\$10,000,000	100%	6%
Economic Revitalization	Small Business Grant Program	\$5,000,000	100%	3%
Infrastructure	Infrastructure Program	\$52,138,100	100%	32%
Mitigation	Mitigation Program	\$21,287,000	100%	13%
Public Services	Housing Counseling	\$1,000,000	100%	1%
Public Services	Workforce Training	\$2,000,000	100%	1%
Administration	Administration	\$8,160,200	100%	5%
Planning	Planning	\$21,480,600	100%	13%
Total		\$163,204,000	100%	100%

4.2.1 Connection to Unmet Needs

As required by the 87 FR 31636 and 87 FR 3198, the City will allocate at least 80% of the funds to address unmet needs with HUD-identified MID areas. The City will allocate 100% of the CDBG-DR funds to address unmet needs within the HUD-identified (MID areas. HUD designated the entire City as a MID area. The City's impact and needs assessment identified five areas that could be addressed with CDBG-DR funds. These areas include:

- Restoring and improving impacted water, sewer, and stormwater infrastructure;
- Repairing and strengthening public infrastructure and critical facilities;
- Reducing high housing cost burden among Ida impacted residents;
- Local businesses recovery; and
- Recovery and resiliency planning.

Each program entry in this section explains in detail how the proposed programs address the specific needs listed above.

4.2.2 Leveraging Funds

The City anticipates leveraging CDBG-DR funds with funding provided by other federal, state, local, and non-profit sources to fully utilize the limited CDBG-DR funds to generate a more effective and comprehensive recovery. As applicable, leveraging requirements may be added to program guidelines, applications, or NOFA/NOFOs/RFPs.

4.2.3 Program Partners

The City may engage program partners through formal agreements such as subrecipient agreements and interagency agreements and through informal partnerships. The City engages with program partners so that programs are more accessible, understandable, and

tailored to equitably meet the unmet needs of the disaster-impacted residents and communities. When formally engaging through agreements, the City will ensure that subrecipients and other partners have the capacity. The City will provide technical assistance and training to partners on program requirements, applicable federal cross-cutting requirements, and reporting and performance requirements.

4.3 Distribution of Funds

It is a requirement of State Grantees to describe how they will distribute grant funds to local governments and Indian tribes. This section does not apply to the City. Most activities will be implemented and administered by the City.

4.4 Program Income

The City does not currently implement programs or activities that generate income as described in 87 FR 31636 and 88 FR 3198. However, if any CDBG-DR activities generate income before or after close-out of the grant, the City will retain program income to fund additional CDBG-DR activities or to fund the repair, operation, or maintenance of existing CDBG-DR activities. The City will comply with all HUD requirements and the program income waiver and alternative requirements and subsequent notices, including tracking program income in the Disaster Recovery Grants Reporting (DRGR) system and using program income before drawing additional grant funds. Specifically, the City will adhere to the program income policies and procedures as stated in the City's financial certifications.

4.5 Resale or Recapture

An applicant may be required to repay all, or a portion of, the funds received. The reasons for recapture include, but are not limited to, the following:

- An applicant is determined to have received awards based upon fraudulent information provided to the City and its programs;
- An applicant voluntarily withdraws from the Program prior to the project completion;
- An applicant is determined to not meet the eligibility requirements for a Program;
- An applicant does not perform some or all the work identified in an approved scope of work on which the award is based;
- An applicant fails to substantially comply with the rules set forth in Program policy manuals; and/or
- An applicant does not report the receipt of additional insurance, SBA, FEMA, non-profit assistance, and/or any other DOB received after calculation of the award.

Furthermore, the City will develop policies that will guide the agency in its efforts to recapture funds that have been overpaid to applicants for any reason. The City does not anticipate the development of any resale requirements with this proposed use of funding.

4.6 Program Details

4.6.1 Disaster Recovery and Resilience Program

The Disaster Recovery and Resilience Program (DRRP) will assist homeowners whose low- to moderate-income or other social vulnerabilities impede their ability to access other sources of recovery assistance in order to fully repair their homes. DRRP aims to assist homeowners by repairing their homes, supporting rehabilitation of older and existing housing stock, and providing safe and decent housing opportunities for residents that incorporate hazard resilience solutions. This Program will be administered through the City's subrecipient partner, PHDC, and will allow for additional costs to comply with federal, state, and local construction standards, such as replacing onsite residential infrastructure, complying with green building standards, and ensuring that homes are accessible for individuals living with disabilities, senior residents, and individuals and families at risk of homelessness.

Total Budget

\$42,138,100

Connect to Disaster and Unmet Needs

Housing is the largest category of unmet need and represents more than 60 percent of the total estimated need. Homeowners whose disaster recovery needs are not fully met by FEMA IA can often have those unmet needs addressed by subsidized loans from the U.S. Small Business Administration (SBA) or insurance. Low- to moderate-income homeowners are less likely to be able to qualify for home and personal property SBA loans. Additionally, while the greatest impacts from Hurricane Ida occurred within the mapped 100-year floodplain, the extreme rainfall from Hurricane Ida overwhelmed stormwater systems, resulting in impacts outside of mapped riverine or coastal hazards. Homeowners outside of mapped floodplains, especially homeowners of limited or modest financial resources, are less likely to access proper resources to respond to damages incurred. There is also substantial need for stable and affordable living opportunities to help create more energy-efficient, disaster resilient, and physically accessible housing; offset rising living costs in the disaster-impacted neighborhoods; and increase wealth-building opportunities.

How Program will Promote Housing for Vulnerable Populations

DRRP promotes housing for vulnerable populations by targeting assistance to individuals whose remaining unmet needs are most likely due to known structural inequalities of the federal disaster assistance framework. That framework assumes homeowners are fully insured against all hazards, have the financial standing to qualify for an SBA loan, and the capability to select, hire, and oversee quality contractors to complete the needed repairs in their homes. Low- and moderate-income households and other vulnerable populations are the least likely to have these resources and capabilities. In Philadelphia, median home values are over \$184,000, meaning these groups' most significant asset is typically their home and impediments to full disaster rehabilitation present a realistic risk to not only the home's

continued habitability but also the devaluation of the asset resulting in an inability to secure alternate permanent housing.

DRRP prioritizes assistance to low- to moderate-income applicants and ensures successful project completion by procuring contractors on behalf of Program applicants. Eligible Program applicants may additionally receive resiliency measures intended to prevent the same type of damages occurring from future events. Risks of becoming homeless will be mitigated by improving the physical condition and resilience of the home to future floods, thereby preserving health, safety, and the financial stability of homeownership. To meet the overarching goals of serving households with health and safety risks and those at risk of housing instability, the program prioritizes households with active code violations for program enrollment.

To promote this program and available housing assistance to vulnerable populations, the City will provide outreach through advertising on social media or other media outlets, creating information materials, giving presentations, providing information at community events, and partnering with and providing information to other organizations that serve vulnerable populations. Outreach strategies are deployed to meet households over 62 and households with disabilities to ensure that vulnerable groups who are least likely to know about the program and/or apply are reached.

The City will also provide applicants, especially any who may be at immediate risk of losing their home, with information and resources made available through City's network of Housing Counseling Agencies and Legal Services Organizations. These partners provide a wide range of services including but not limited to assistance to prevent foreclosure; resolve tangled titles; avoid fraud; and prepare for future disasters.

Reaching the desired applicant pool is critical to achieving the desired end results of supporting housing stability among the community's most vulnerable homeowners. The application intake process will be designed to capture self-reported income and key demographic data that will support prioritization of application processing. In addition, the City and PHDC will continue to develop detailed demographic data analysis of the disaster-declared area to support geographically targeted Program marketing. Application submissions and Program inquiries will be monitored for demographics and geography throughout the Program application period and the City and PHDC may modify its outreach efforts if known vulnerable and impacted communities are underrepresented.

Program Definition of Second Home/Eligibility

Assistance is available only for primary residences. An individual's primary residence is the address where an individual spends the most time during the year, per HUD definition.

National Objectives

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need. The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI. The national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Benefit to Most Impacted and Distressed Areas

All projects will be located in Philadelphia which is a HUD identified MID Area. The first phase of this program will target homeowners located in zip codes most impacted by Ida (See Section 2.1). Additional zip codes may be added contingent upon the availability of funding.

Eligible Activities

Eligible activities will include rehabilitation and repair of residential structures as described in HCDA Section 105(a)(4) including but not limited to single-family owner-occupied rehabilitation, hazard mitigation, mobility (ADA) measures, and other activities to make homes safe and habitable.

Eligibility Criteria

Property

- Costs for rehabilitation are reasonable and consistent with market costs at the time and place of construction.
- Property taxes are current, on an approved payment plan or have an exemption under current laws.
- Mortgage is current, a payment plan is in place, or a payment plan can be established to resume good standing.

Applicant

- Applicant(s) must own the property.
- The property must be the owner's primary residence at the time of the storm and at the time the award is distributed.
- Household income must be less than or equal to 80% AMI.

Participants whose properties are located in a Special Flood Hazard Area or a 100-year floodplain may be eligible to receive assistance as long as the value of the proposed repair and improvement work does not meet or exceed the substantial improvement threshold, which is 50 percent of the market value of the house before construction.²

Program Responsible/Administering Entity

- City of Philadelphia Division of Housing and Community Development (DHCD)
- Subrecipient: Philadelphia Housing Development Corporation (PHDC)

² Philadelphia Building Code & Code Bulletin No. A-1702R2. Note: property owners can appeal market value/SI through BBS or OPA.

Program Maximum Assistance

The City is setting a maximum award of up to \$150,000 per applicant.

Method of Distribution

The City intends to provide assistance in the form of a grant to fund repairs and resilience upgrades performed by PHDC-procured contractors or PHDC-administered zero-interest loans to the homeowner. Allowable exceptions to the maximum award include:

- Installation of and/or repair to reasonable accommodations are included in the repair scope for all applicants having at least one full-time household member with a documented disability and may result in an award that exceeds the maximum amount of assistance.
- When allowable and approved change orders due to unforeseen conditions result in the total project cost exceeding the \$150,000 maximum.

All exceptions to the Program maximum award will be reviewed according to Program policies and procedures prior to being awarded.

National Objectives

LMI Benefit; Urgent Need

Timeframe

The City anticipates that the program will launch in Quarter 1 of Calendar Year 2025. The program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or within the established period of performance allowable under this grant.

4.6.2 Rental Repair, Rehabilitation, and Construction Program

The program will assist eligible owners of rental properties to rehabilitate, repair, and construct new rental housing to provide safe, clean, and affordable rental housing to LMI households. The program will restore or create additional affordable rental units for residents impacted by Ida. It also will work to improve rental housing conditions for residents most impacted by the storm. Properties must maintain affordability periods in accordance with the standards described in the Program Affordability section below.

The program will provide assistance for activities necessary to restore and improve rental units for residents impacted by Hurricane Ida, including rehabilitation, repair, and other resiliency improvements. This also includes construction of new rental units. Resiliency improvements activities may include, but are not limited to, structural and utility retrofits to make the building more resistant to floods, grading and slope stabilization, and drainage improvements. Assistance also may be provided to make housing accessible for individuals living with disabilities. Substantial rehabilitation, or reconstruction of properties with more than four rental units will include the installation of broadband infrastructure, where

feasible. Only costs incurred after an award will be eligible for reimbursement. Reimbursement of pre-award costs is not allowed.

Total Budget

\$10,000,000

Connect to Disaster and Unmet Needs

Housing is the largest category of unmet need and represents more than 60% of the total estimated need. As noted in the City's Unmet Needs Assessment, the City believes renter needs are underestimated and less known based on data that is currently available. Through this program, the City seeks to begin addressing unmet rental housing recovery needs by providing rehabilitation/reconstruction assistance to landlords to ensure the availability of safe, affordable housing for those impacted by Hurricane Ida.

How Program will Promote Housing for Vulnerable Populations

The City is committed to increasing the availability of affordable rental units within the disaster-impacted areas, which will directly support housing for vulnerable populations. The manner in which the program promotes housing for vulnerable populations includes, but is not limited to:

- Providing assistance that results in the availability of long-term affordable rental housing for low-income renters. According to the city's 2022 Assessment of Fair Housing, renters are the most housing cost-burdened group in the City. This program is designed to principally provide affordable rental housing to LMI households living in disaster-impacted communities for up to 5 years.
- Utilization of accessibility standards and supporting code measures to support renters living with disabilities. Reasonable efforts will be made to ensure that program-funded units will have accessibility standards built into the rehabilitation design, thereby increasing accessible housing stock in the impacted areas. The scope of work funded under the program will comply with applicable codes and standards. This will provide more safety measures for the tenant and thus a more sustainable, safe place to live.
- The City will offer housing counseling services to tenants occupying affordable rental units. Tenants occupying the rehabilitated units will be offered access to housing counseling services. They will be informed of their housing rights, the maximum rents that landlords may charge them (including whether they have housing choice vouchers or other subsidies), and the availability of support for limited English proficient individuals in understanding the home rental process. This strategy is consistent with helping address housing impediments, which include difficulty in accessing housing and understanding the home rental process for people with a lack of public information about housing law rights and responsibilities.
- The City will offer housing counseling services to landlords. Landlords will be offered financial and housing counseling. Counseling will include training, how to account for

housing choice vouchers and other rental payments in what they charge tenants, reporting and tenant eligibility requirements, URA requirements, affordability period requirements, and the terms and conditions of their awards. The property owner will be instructed on all federal and local fair housing laws and regulations, including the prohibition of discrimination.

- The City will aim to leverage existing resources and engaging community-based organizations, nonprofits, community housing development organizations, and public housing authorities to conduct outreach, facilitate engagement, and connect affordable units with vulnerable populations. By working closely with community-based organizations, the city will be able to access vulnerable impacted renters who may not yet have participated in other recovery programs. Outreach and engagement will target households and landlords with limited English proficiency and households at or below 30% of AMI. The City also will make efforts to match impacted residents with landlord.

Program Affordability

Affordability Period: A period of affordability will be applied for developments containing five units or greater in accordance with HOME program standards of 24 CFR 92.252(e), and for developments of four units or fewer, those will be governed by periods set in the program policies.

Affordable rents: Rents payable by the household plus utilities may not exceed 30% of income for a household earning 80% of AMI. The City will publish the affordable rents annually for participating landlords and tenants to understand the maximum affordable rents that may be charged on affordable units. These affordable rents will be based off HUD Fair Market Rents, which are updated annually.

The affordability period will be enforced with a lien. Assistance will be provided in the form of a zero-interest secured forgivable loan. Owner(s) must agree to the forgivable loan compliance period and lien requirements, as applicable.

- The lien on the property will be removed upon completion of the terms and conditions of all documents related to the program and completion of the compliance period.
- Where disaster assistance triggers the flood insurance purchase requirement, assisted owners will notify any transferee of the requirement to obtain and maintain flood insurance, in writing, and to maintain such written notification in the documents evidencing the transfer of the property, and that the transferring owner may be liable, if they fail to do so.
- Should the homeowner sell or otherwise convey their ownership interest in the property during the compliance period, the remaining prorated amount of assistance will become immediately due and payable.

Program Definition of Second Home/Eligibility

Assistance is available only for primary residences. An individual's primary residence is the address where an individual spends the most time during the year, per HUD definition.

National Objectives

Assistance provided under this program will meet the national objectives of benefiting LMI persons or households or addressing an urgent need. The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI. The national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Benefit to Most Impacted and Distressed Areas

All projects will be located in Philadelphia which is a HUD identified Most Impacted and Distressed Area. The first phase of this program will target homeowners located in zip codes most impacted by Ida. Additional zip codes may be added contingent upon the availability of funding.

Eligible Activities

Rehabilitation, reconstruction, acquisition, and lead-based paint and clearance; HCDA Section 105(a)1, 2, 4, 5, 11; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice, other applicable waivers or alternative requirements. Only costs incurred after an award will be eligible for reimbursement. Reimbursement of pre-award costs is not allowed.

Eligibility Criteria

Eligible applicants include any public, private, for-profit, or nonprofit entity that owns the subject property at the time of application.

- Priority may be given to the original owners who owned the property continuously from the time of the storm until the time of application for assistance.
- New owners include those entities who (1) purchased the property after the storm or have an option to purchase, or other suitable form of site control for an eligible property that received a significant amount of damage during the storm; and (2) wish to exercise that option in order to rehabilitate the property.

Property:

- Must not be located in a floodplain.
- Costs for rehabilitation are reasonable and consistent with market costs at the time and place of construction.
- Property taxes are current, on an approved payment plan or have an exemption under current laws.

Eligible Beneficiaries

The program's beneficiaries are renters who meet the income eligibility or disaster impact criteria including current residents of the project. The buildings once renovated must maintain the required LMI thresholds for the affordability period.

Program Responsible/Administering Entity

- City of Philadelphia Division of Housing and Community Development (DHCD)
- Subrecipient: Philadelphia Housing Development Corporation (PHDC)

Program Maximum Assistance

The maximum award is \$150,000 per unit for any rehabilitation project. Program guidelines will stipulate a process for applications to identify situations where exceeding the maximum award amount may be necessary. For example, increased costs of compliance associated with accessibility concerns, environmental mitigation, and other extenuating circumstances may warrant exceeding the maximum award amount. Such requests will be reviewed by the City on a case-by-case basis.

Method of Distribution

The City expects to launch once criteria have been established and the substantial amendment process has been completed. The City will conduct an outreach and public notice campaign. The initial application period will be open for six months. The application process may be reopened at the discretion of the City. The City plans to contract with a prime vendor as well as specific sub-contractors to fulfill federal requirements and ensure program compliance.

National Objectives

LMI Benefit; Urgent Need

Timeframe

This program will begin in Calendar Year 2025. The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.6.3 Ida Business Assistance Program

The City will implement the Ida Business Assistance Program (IBAP) to provide working capital for businesses that can prove business impacts resulting from Hurricane Ida.

The program will achieve the following objectives:

1. Support recovery from Hurricane Ida's disaster impacts; and
2. Restore and improve the local economy through job creation and retention for low-to-moderate (LMI) income individuals, LMI Area Benefit (LMA), and LMI Limited Clientele (LMC).

Total Budget

\$5,000,000

Responsible Entities and Program Partners

- City of Philadelphia Department of Commerce
- Subrecipient: Philadelphia Industrial Development Corporation (PIDC)

Connect to Disaster and Unmet Needs

This program addresses unmet recovery and mitigation economic revitalization needs in HUD-identified and grantee-identified MIDIs after deducting any duplication of benefits from other federal, State, or private sources, more specifically remaining needs tied to the SBA and The Merchants Fund assistance programs.

Benefit to Most Impacted and Distressed Areas

All projects will be located in HUD identified Most Impacted and Distressed Areas.

Eligible Activities

Economic Revitalization and Development; HCDA Section 105(a)(17)

Eligibility and Selection Criteria

Small businesses that meet the following criteria are encouraged to apply:

- Located within the City of Philadelphia;
- Have business impacts directly related to Hurricane Ida;
- Compliant with local, state, and federal regulations;
- Do not have outstanding taxes due to the City.

Maximum Assistance

The grant assistance for the Small Business Grant program will range from \$20,000-\$150,000 per applicant. As described in Appendix B [II.D.3 of the 88 FR 3198](#) the public benefit standard from the Annual CDBG program, which sets limits on the amount of CDBG assistance, has been waived. Therefore, HUD has not established a dollar amount or award cap for economic development activities.

Method of Distribution

The City will accept applications on a rolling basis for two full calendar years. The Philadelphia Department of Commerce will intake, review, and approve applications. PIDC will distribute grant awards.

National Objectives

The program will meet the national objective of LMI job creation or retention (LMJ), LMI Area Benefit (LMA), and LMI Limited Clientele (LMC).

Timeframe

The City will launch the program in the fourth quarter of Calendar Year 2024 and accept applications on a rolling basis for no longer than two calendar years (Q4 2026). The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.6.4 Infrastructure Program

This program will fund eligible projects within the identified HUD MID (Philadelphia) to address unmet recovery and resiliency needs associated with public infrastructure and critical facilities. The grant funds will allow the City to restore and construct critical infrastructure and facilities that will directly benefit residents impacted by Hurricane Ida and the larger community.

The Infrastructure Program identifies infrastructure as including, but not limited to, the following types of projects: streets, water and sewer facilities, playgrounds, and underground infrastructure, as well as flood and drainage measures. The program identifies critical facilities as buildings that serve a public safety purpose for local communities and reduce any damage and loss of life from future storm and disaster events.

Total Budget

\$52,138,100

Responsible Entities and Program Partners

The program will be administered and implemented by the City of Philadelphia.

Connect to Disaster and Unmet Needs

This program addresses unmet infrastructure and critical facility needs in the HUD-identified MID (Philadelphia), after deducting any duplication of benefits from other federal, State, or private sources. These program funds will replace damaged systems or build new systems that will help protect life and property and can withstand future disasters.

Benefit to Most Impacted and Distressed Areas

All projects will be located in HUD identified Most Impacted and Distressed Areas.

Eligible Activities

Infrastructure and public facility improvements as described in 105(a)(2) which includes the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.

Awardees may use Infrastructure funding as the non-federal cost share portion of other grants as described at 24 CFR 570.201(g).

Eligibility and Selection Criteria

The City will restore and/or improve City-owned infrastructure directly and indirectly impacted by Hurricane Ida. Projects will focus on:

1. Recovering from Ida's disaster impacts;
2. Reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters;
3. Protecting publicly funded recovery investments in impacted communities;
4. Expanding awareness of resiliency and mitigation within the City and help build the capacity of City departments to prepare effective mitigation and resiliency projects; and
5. Promote a "green-first" approach by exploring opportunities to integrate best practices and strategies identified in the City's Green City, Clean Waters and Office of Sustainability initiatives.

The City will prioritize disaster-related systems and other disaster-related community-based mitigation systems (e.g., using FEMA's community lifelines) to guide project development. Proposed projects will demonstrate alignment with relevant local plans and infrastructure development efforts to foster the potential for additional infrastructure funding from multiple sources. Relevant plans will depend on the specific project but may include the City's Capital Program and Budget, the City's Hazard Mitigation Plan (HMP), the City's Comprehensive Plan, the Delaware Valley Regional Planning Commission's Long Range Plan. In order to withstand chronic stresses and extreme events, the City will prioritize projects that employ adaptable and reliable technologies to prevent premature obsolescence of infrastructure. The City will also focus on exploring opportunities to invest in restoration of infrastructure and related long-term recovery needs within communities that lacked adequate investments transportation, water, wastewater, and community infrastructure prior to the disaster.

Maximum Assistance

The expected minimum program assistance available is \$500,000 and the expected maximum assistance is \$52,138,100. However, actual assistance will be determined based on the particular needs of and what is cost effective for each site. The City will also make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities.

National Objectives

LMI Benefit; Urgent Need

Eligible awards based on the Urgent Needs national objective are anticipated in limited circumstances, including when projects can demonstrate a particular urgency in addressing the impacts and are not eligible under LMI.

Method of Distribution

City departments will receive funds through this program. City staff will be paid with CDBG-DR funds through City payroll while contractors will be reimbursed as work on these programs is performed.

Timeframe

This program will begin within 3 months of HUD granting Authority to Use Grant Funds (AUGF). The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.6.5 Mitigation Program

Proactively addressing the impacts of natural disasters is critical to building long-term resiliency in Philadelphia. Mitigation is one of the best ways to support the health and well-being of vulnerable community members before disaster strikes. The Mitigation Program will enable Philadelphia neighborhoods to proactively implement innovative solutions that will make their communities more resilient.

This program will fund hazard mitigation projects that aim to strengthen facilities, structures, and communities to make them less vulnerable to future disaster impacts. Eligible activities include the acquisition of flood-prone structures, localized drainage improvements, wind retrofit of structures, elevation of critical building components, and the development of plans and zoning efforts to decrease community exposure to severe weather events. The program may be used in conjunction with other programs identified in the Action Plan or as a standalone project. It should be guided by the City's Hazard Mitigation Plan (HMP).

This program will also offer matching funds to other recovery and resiliency mitigation projects. Offsetting the burden of non-federal cost share and local matches to the City is a critical activity. This program will fund local match requirements for grant applications to various competitive grant programs including but not limited to FEMA's Hazard Mitigation Assistance (HMA) programs, Bipartisan Infrastructure Law (BIL) programs, and Congressional Delegated Spending for Pre-Disaster Mitigation (CDS-PDM).

Total Budget

\$21,287,000

Responsible Entities and Program Partners

The program will be administered and implemented by the City of Philadelphia.

Connect to Disaster and Unmet Needs

Projects funded through this program will address remaining direct and indirect needs in the HUD-identified MID (Philadelphia) and also incorporate mitigation measures into activities.

Projects may also not have indirect or direct tie-back to Hurricane Ida but still incorporate mitigation measures into the recovery activities.

Benefit to Most Impacted and Distressed Areas

All projects will be located in HUD identified Most Impacted and Distressed Areas.

Eligible Activities

Acquisition, construction, reconstruction, or installation of public works, facilities, and other residential site improvements eligible under Section 105(a)(2) of the HCDA. Activities also approved under Section 105(a)(9) of the HCDA which authorizes payment of the non-Federal share required in connection with a Federal grant-in-aid program. All activities must be CDBG-DR eligible, meet a national objective, and able to comply with the applicable federal requirements. Exceptions to eligible activities and applicant eligibility will be described in the program guidelines.

Eligibility and Selection Criteria

Similar to the infrastructure activity, this program will focus on:

1. Recovering from Ida's disaster impacts;
2. Reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters;
3. Protecting publicly funded recovery investments in impacted communities;
4. Expanding awareness of resiliency and mitigation within the City and help build the capacity of project sponsors to prepare effective mitigation and resiliency projects; and
5. Promote a "green-first" approach by exploring opportunities to integrate best practices and strategies identified in the City's Green City, Clean Waters and Office of Sustainability initiatives.

The City will prioritize disaster-related systems and other disaster-related community-based mitigation systems (e.g., using FEMA's community lifelines) to guide project development. Proposed projects will demonstrate alignment with relevant local plans and infrastructure development efforts to foster the potential for additional infrastructure funding from multiple sources. Relevant plans will depend on the specific project but may include the City's Capital Program and Budget, the City's Hazard Mitigation Plan (HMP), the City's Comprehensive Plan, the Delaware Valley Regional Planning Commission's Long Range Plan. In order to withstand chronic stresses and extreme events, the City will prioritize projects that employ adaptable and reliable technologies to prevent premature obsolescence of infrastructure. The City will also focus on exploring opportunities to invest in restoration of infrastructure and related long-term recovery needs within communities that lacked adequate investments transportation, water, wastewater, community infrastructure, and resilient housing prior to the disaster.

Maximum Assistance

Maximum assistance will be identified at a later date. Updates will be made available through the City's Action Plan amendment process.

Method of Distribution

The City will develop a method of distribution at a later date. Updates will be made available through the City's Action Plan amendment process.

National Objectives

LMI Benefit; Urgent Need

Eligible awards based on the Urgent Needs national objective are anticipated in limited circumstances, including when projects can demonstrate a particular urgency in addressing the impacts and are not eligible under LMI.

Timeframe

This program will begin within 18 months of HUD granting Authority to Use Grant Funds (AUGF). The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.6.6 Planning

The City will offer funds to City departments and offices. Planning funds will assist the City in determining community needs related to disaster impacts along with mitigation and resiliency needs. Addressing the recovery and mitigation needs of Philadelphia requires the continued fostering of a culture of preparedness and the provision of tools for proper planning. Planning studies in coordination with city agencies, state agencies, federal agencies, and regional entities, will help guide recovery solutions and better identify hazard risks, impacts, and subsequent mitigation measures. CDBG-DR funds can also provide additional staffing capacity where needed to support the implementation of recovery activities. Through increased planning, neighborhoods across Philadelphia can better understand the risks they face and put measures in place to lessen the impacts in the future.

The CDBG-DR Planning allocation is \$21,287,000 and will be used to support City recovery and mitigation planning efforts. Planning funding can be used for land use planning, hazard mitigation planning, modernization, and resiliency planning, upgrading mapping capabilities and other plans or capabilities to better understand recovery needs and evolving disaster risks, and planning and community outreach to provide education.

Total Budget

\$21,480,600

Responsible Entity:

The City of Philadelphia will be responsible for administering and implementing planning activities.

Connect to Disaster and Unmet Needs

This program focuses on identifying existing and future needs and reducing or eliminating the negative impacts of Hurricane Ida. All planning projects will focus on areas located in HUD identified Most Impacted and Distressed Areas.

Eligible Activities

HCDA Section 105(a)(12) and Section 105(a)(15), administration costs, applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice, other applicable waivers or alternative requirements.

Eligibility and Selection Criteria

Project approval and associated funding allocations will be made through evaluation of criteria related to the potential projects and funding availability. The City will assess each project based on the response to the following criteria. For projects to be eligible, the project must:

- Be an eligible activity under CDBG-DR.
- Have a proposed plan that address an unmet need and/or will mitigate risk
- Serve Philadelphia residents.

The City will carefully review potential projects and assess such factors as the following:

- Proposed plan is in alignment with meeting the CDBG-DR goal of helping mitigate future disaster risks.
- Degree to which the proposed plan will consider and mitigate risks to members of protected classes and HUD-defined vulnerable populations.
- Proposed project will include a path for adopting and implementing the plan.

Maximum Assistance

The expected minimum program assistance available is \$50,000 and the expected maximum assistance is \$5 million. However, actual assistance will be determined based on the particular needs of and what is cost effective for each project.

Method of Distribution

Multiple City departments and offices will receive funds through this program. City staff will be paid with CDBG-DR funds through City payroll while contractors will be reimbursed as work on these programs is performed.

Timeframe

This program will begin within three months of HUD granting Authority to Use Grant Funds (AUGF). The program will end when all funds have been expended and all eligible

participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.6.7 Ida Recovery Public Services – Housing Counseling

The City will provide grants to subrecipients to deliver critical supportive services that have increased because of the storm. This housing counseling program was developed by the City to provide a wide range of counseling services to residents impacted by Hurricane Storm Ida. Residents include homeowners, renters, and householders experiencing homelessness.

The program is a collaboration of HUD-approved, nonprofit, community-based organizations that provide a wide range of counseling services. Subrecipients will provide supportive services, such as foreclosure prevention, relocation services, and debt management, and assist with application intake for CDBG-DR-funded programs. It will also help unemployed and underemployed residents find employment by providing job training in skill areas related to recovery efforts.

The City will develop oversight policies and procedures to ensure compliance with HUD housing counseling requirements and the Final Rule for Housing Counseling Certification requirements.

Total Budget

\$1,000,000

Responsible Entity:

Eligible subrecipients include HUD-approved, housing counseling agencies, nonprofit organizations, and community-based organizations.

These entities may apply directly to the City for funding. However, subrecipients cannot assume the role of responsible entity; as such, the City will remain the responsible entity for direct awards to subrecipients.

Connect to Disaster and Unmet Needs

The program provides services to individuals and households living in the impacted communities or who were impacted Hurricane Ida.

Eligible Activities

HCDA Section 105(a)(8) including but not limited to housing counseling and employment services (e.g. job training).

Eligibility and Selection Criteria

Subrecipient eligibility is limited to HUD-approved, housing counseling agencies, nonprofit organizations, and community-based organizations.

Applicants or beneficiaries must be individuals and households living in the impacted communities or who were impacted Hurricane Ida.

The program policies and public funding announcements will provide information on how qualified organizations are selected as subrecipients, to include all scoring criteria, relative weighting, and minimum requirements. Subrecipients will be selected competitively through a NOFA, competitive procurement, or other process described in the program guidelines. The program is not competitive for residents seeking housing or legal services. Subrecipients are required to adhere to HUD Final Rule for Housing Counseling Certification requirements.

Maximum Assistance

The maximum amount allocated to subrecipients will be \$1,000,000 and detailed in the program guidelines and applicable Notice of Funding Availability (NOFA) and will be determined based on such factors as the subrecipient's capacity, the scope of work, the types of services provided, and/or the communities served by the organization.

Method of Distribution

The City will implement this program through subrecipients.

Timeframe

This program will begin within 12 months of HUD granting Authority to Use Grant Funds (AUGF). The program will end when all funds have been expended and all eligible participants have completed closeout, or 6 years after execution of the grant agreement with HUD.

4.6.8 Ida Recovery Public Services – Workforce Training

The City will provide a grant to PowerCorpsPHL to deliver expanded workforce training services in skill areas related to recovery and mitigation efforts.

The training provided will result in a pool of skilled laborers, ready to work in infrastructure, and community-based careers in Philadelphia, supporting projects needed for recovery from Hurricane Ida and/or mitigation against future disasters.

Total Budget

\$2,000,000

Responsible Entity:

PowerCorpsPHL will partner with the City as a subrecipient.

Subrecipients cannot assume the role of responsible entity; as such, the City will remain the responsible entity for the direct award to PowerCorpsPHL.

Connect to Disaster and Unmet Needs

The program provides expanded workforce capacity for undertaking Hurricane Ida recovery efforts and mitigation projects that reduce the impacts on the City's built environment during future disasters.

Eligible Activities

HCDA Section 105(a)(8) including but not limited to employment services (e.g. job training).

Eligibility and Selection Criteria

Subrecipient eligibility is limited to PowerCorpsPHL, an organization whose mission is to empower Philadelphia's youth through paid 4- to 24-month training programs, which lead to community-focused careers in fields such as energy and mitigation infrastructure.

Beneficiaries will be individuals living in the City of Philadelphia (the HUD-defined MID). Workforce training will focus on projects that aid in the recovery of damage caused by Hurricane Ida and mitigation efforts aimed at reducing the impact of future disasters on the City of Philadelphia.

Maximum Assistance

The maximum amount allocated to subrecipients will be \$2,000,000.

Method of Distribution

The City will implement this program through a subrecipient, PowerCorpsPHL.

Timeframe

This program will begin in the third quarter of Calendar Year 2025. The program will end when all funds have been expended and closeout is complete, or six (6) years after execution of the grant agreement with HUD.

4.6.9 Administration

The City will use administration funds for necessary general administration costs related to CDBG-DR grants, including but not limited to staff time administering programs, compliance, and monitoring of the City's subrecipients, vendors, and other recipients of funding; and other costs specified as eligible administrative expenses in 2 CFR 570.206. Up to 5% of the overall grant and any program income may be used for administration of the grant.

Total Budget

\$8,160,200

Eligible and Ineligible Activities

Eligible expenses are Administration Costs, as defined at 24 CFR 570.205 and 24 CFR § 570.206 and any applicable waivers or alternative requirements.

Timeframe

The City will begin the program after the grant is awarded and is prepared to complete the program within the period of performance. The program will end when all funds have been expended and program activities have completed closeout or six years after execution of the grant agreement with HUD.

SECTION 5. APPENDIX

5.1 Certifications

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
- f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- i. The grantee certifies that it is complying with each of the following criteria:
 1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

2. With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
3. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70% (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
 - b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.

- n. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

5.2 Waivers (If Applicable)

CDBG-DR grantees that are subject to the Consolidated Notice, as indicated in each Federal Register notice that announces allocations of the appropriated CDBG-DR funds ("Allocation Announcement Notice"), must comply with all waivers and alternative requirements in the Consolidated Notice, unless expressly made inapplicable.

At this time, the City has not identified specified waiver requests and will update this Plan, as necessary, to include any waivers requested.

5.3 Summary and Response of Public Comments

The following provides a summary of public comments received for the CDBG-Disaster Recovery Action Plan in response to Hurricane Ida during the public comment period from July 14, 2023 – August 15, 2023. The City of Philadelphia received a total 97 comments during the 30 calendar days.

1. Public Comment: 23rd & 22nd Street bounded from Arch to I-676 (and Park Towne Place) was hit hard. Going forward, we need to be prepared for the next flood. There were so many cell phone alerts residents tuned them out. Result: loss of cars not relocated to higher ground, houses and garages flooded.

We need to practice alerts and evacuations of people (we have one tower with elderly non-English-speaking residents) and things (cars) in this flood zone. I tried to get Phila OEM engaged afterwards, but we still don't have a disaster evac plan.

Disaster recovery was very poor. The day after it was an at-large city councilwoman and myself walking the neighborhood arranging for trash trucks and assistance, we had to request assistance-there was no on the ground presence by the City. Remember it was Labor Day weekend and thus Made In America was ongoing and the focus (and a lot of trash trucks) was on the BF Parkway next door, even with the 676 flood getting all the press. To say that I was underwhelmed by the city's response would be too kind. Develop an evac plan. Practice with an annual drill, work with the Logan Square Neighborhood Association (LSNA). Establish capability. Don't repeat 2021. Glad to speak with you about this. Glad to work with you.

Response: Thank you for your response. Planning and preparedness are crucial for reducing disaster risk going forward, which is why the CDBG-DR Draft Action Plan allocates \$21 million to fund planning efforts aimed at mitigation and resilience building. The plan was put together in consultation with the Office of Emergency Management (OEM), who will continue to be a partner throughout the implementation period of the grant. Work centered on increasing preparedness for future disasters is potentially eligible under the planning allocation and will be explored on a case by case basis in the implementation process of the grant. As described in the Action Plan, the aftermath of Hurricane Ida revealed needs tied to the City's preparedness and response to extreme weather events. The City agrees and recognizes the need to improve evacuation planning and protocols.

2. Public Comment: My idea for the 163 million of the Ida relief funds, is to repair the badly damaged and sinking street of the 4400 block of Salmon st, which has been sinking slowly for over the past 15 years. We are getting sink hole after sink hole. Thank you.

Response: Thank you for your time in providing feedback. The city acknowledges that Ida had profound impacts on infrastructure throughout Philadelphia – including streets. We will coordinate with relevant city partners to address top priority areas for repair going forward.

3. Public Comment: Hi. I am a city resident and would like to offer some suggestions on how to spend the Hurricane Ida monies awarded to the city. First, I think that the issue of the urban heat islands should be addressed to help provide some heat relief to residents. Many of the streets without foliage now originally had trees lining them, but through the years those trees either died, were damaged in storms, or heaved up pavements with wandering roots and so were removed.

If the city installed heavy concrete planters with trees in them, and residents would agree to help water them, etc., that could provide some measure of relief while also beautifying city streets. Now, I know they would not be towering elms, but even smaller trees improve the environment. Residents could also plant flowers around the perimeter of the tree planters as well if desired. Residents could help water trees, and wouldn't even need an

outside hose connection or a watering can—a bucket or large cooking pot would work just as well!!

Also, I think metal wire trash cans should be placed on various streets throughout the city, chained to telephone poles to prevent stealing, and lined with plastic 35 gallon trash bags. Then, the sanitation trucks should be equipped with cases of the bags, and can change them out as needed while on their regular collection routes.

Another idea would be to renovate abandoned buildings, strip malls, unused school district buildings, etc. into affordable housing for low income residents, veterans, and homeless persons. There are plenty of them to choose from around the city, and repurposing these buildings would not only be providing a service for residents, but also eliminate options for drug users, squatters, and criminal activity. These are my suggestions for some of the Hurricane Ida monies. I hope you will consider them!

Response: We appreciate you taking the time to provide your feedback. Thank you for your question. The issue of extreme temperatures is mentioned in both the CDBG-DR Action Plan Mitigation Needs Assessment and the City's Hazard Mitigation Plan. Projects to alleviate this issue may fall under the \$21 million Mitigation set aside. Specific projects will be evaluated on a case-by-case basis after eligibility requirements for this grant program are finalized.

4. Public Comment: Clean the culverts and sewers from all plastic dog bags, plastic bottles, recycle material that blows into sewers when storm wind come. They all block sewer pipes and back up water flow and floods streets and drains.

Response: Thank you for your response. It is a city priority to reduce the impact of storm events going forward by using CDBG-DR funds. The Hurricane Ida Recovery Plan allocates \$52 million to infrastructure projects, including sewer, water, and stormwater infrastructure. Additional points of emphasis similar to the waste management options you mentioned will also be considered.

5. Public Comment: I am a resident of Eastwick. I have added a few pictures from the last flooding or our area. We are hoping to be included in any future plans. We really appreciate an early warning system, more help before things happen such as better sewage treatment and street cleaning as well as more methods to avoid flooding in general.

Response: We thank you for your comment and time. The pictures sent have been recorded and saved. Eastwick is a community heavily impacted by flood events in Philadelphia and reducing disaster risk is a top priority for the City. The Office of Emergency Management is currently working towards an early warning system pilot with the Eastwick Community, and the Office of Sustainability is also developing a

'resilient homes' toolkit tailored specifically for Eastwick. Mitigation funds are intended to support implementation of strategies identified through ongoing work.

6. Public Comment: Eastwick Friends and Neighbors Coalition official statement - [Here](#)
Response: Thank you for your comment. The City is actively working with partners to fully address the content of your feedback. We recognize the unique vulnerability that the Eastwick community experiences during storm events. Your concerns about floodplain development have been noted. We are in active collaboration with subject matter experts in the Office of Sustainability and Office of Emergency Management on flood risk management best practices. Some resources on flood risk management are found at the link [Here](#). It should also be noted that the Action Plan uses best available data from FEMA to determine where Ida impact was most pronounced in the city. This assessment can change with new information, so we encourage and welcome your continued feedback.

The Action Plan allocates \$15 million for Mitigation projects which will work to reduce the impact of future disasters for vulnerable residents. Mitigation funds may be used for a wide variety of interventions that reduce flood risk in communities like Eastwick. Projects will be evaluated on a case-by-case basis once program details are finalized in early 2024.

Your comments on citizen participation and accessible communication have also been noted. Section 3.1 of the Action Plan details the community engagement carried out to ensure resident desires are reflected in the plan. Section 2.1.5 of the Action Plan details the City's drive to effectively engage and design programs to benefit vulnerable residents, protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas of poverty, and historically underserved communities. These priorities will impact communications to Philadelphia communities and program design.

Finally, The Office of Emergency Management is currently working towards an early warning system pilot with the Eastwick Community, and the Office of Sustainability is also developing a 'resilient homes' toolkit tailored specifically for Eastwick to better serve residents.

We are excited to receive your feedback and look forward to continued collaboration throughout the process.

7. Public Comment: Please, more police! Police are not visible in Center City. People are afraid to come into the City for dinner and a show. Parking, dinner and tickets makes the city money!! The more people from the suburbs spend, the more money for the city. It is not difficult to understand for most of us

Response: Thank you for your response! While the Action Plan is specifically related to disaster recovery and resilience, your comment has been noted.

8. Public Comment: To whom it may concern,

The installation of sluice gates on the Schuylkill River dam would allow for the lowering of the river level by many feet in advance of flooding events giving the river much needed additional capacity to handle flood waters. It would and allow for the river to flow at a faster rate with less obstruction through the dam, rather than water impounding behind it.

This would protect Manayunk and many other river flood prone areas and much more cost-effective than building flood control measures up and down the river.

Response: Thank you for your comment. The Schuylkill experienced historic flooding during Hurricane Ida, so ensuring resilience to such events is a top priority. We have active collaboration with subject matter experts in the Philadelphia Water Department (PWD) to determine the most effective solutions possible. The \$52 million for infrastructure repairs and improvements may cover a variety of project types which will all be evaluated on a case-by-case basis.

9. Public Comment: Over the years, particularly since Hurricane Floyd in 1999, flood waters have caused substantial damages to properties throughout our Eastwick community and, because of these floods, many people suffered extensive property damages, including emotional and bodily injuries.

These homes were constructed in the flood plain of the Darby Creek and Cobbs Creek, in the Eastwick area. Residents believe that this negligently caused the flood plain of the Darby and Cobbs Creeks to be reduced in size, due to the obstructions and occupation of the flood plain, so that properties that were formerly protected from flood waters by elevation or flood proofing, became exposed to and subject to floor waters of the creeks. We firmly believe that predicted unusually heavy rainfalls, creek waters backing up into homes, inadequate storm sewers that were backed up and clogged (the sewers were unable to carry away the water that accumulated), and other problems, all were, unsurprisingly, a part of the conditions which caused massive flooding to occur in the Eastwick community during Hurricane Ida in 2021.

Many newer residents of the Eastwick community had not been warned about these particular problems. During the house buying process, some residents were advised that they needed flood insurance, and others were told that they did not need flood insurance and/or flood insurance was never mentioned. That is a huge problem that should be addressed by federal, state and city governments, and should include banks, mortgage companies, et al.

After experiencing Hurricane Floyd in 1999, we learned that there was also the problem of a berm that had been illegally constructed and maintained. This berm, we were told,

blocked the natural flow of water through the area in which the Eastwick homes were constructed. As a result, the water flowing into and around these particular Eastwick properties could not and did not runoff into natural and manmade water courses as had been provided and projected. The flood water instead collected and flooded the Eastwick communities.

If there were any government officials in our Eastwick neighborhood after Hurricane Ida, they were never spotted by our residents. These elected officials, while running for office, make promises to voters that they don't intend to keep, and once they get into office, constituents are promptly forgotten...along with their promises. Political games. It's a shame and it's deceitful. There is always a lot of talk to the news media by government officials, but after the media moves on to more current news items, the government officials turn their backs and proceed to other unsuspecting neighborhoods spouting more dishonest words.

A warning system would have allowed us, the citizens of the Eastwick community, to possibly reduce our damages, and possibly injuries, by removing as much of our property from the flood area as we could. We, Eastwick residents, should have been warned that flooding was likely to occur as a result of negligence concerning dangerous conditions. The flood waters in Eastwick contained dirt, debris, sewage, including hazardous waste, chemicals, downed power lines, and much, much more.

We, the residents of Eastwick, have experienced three such floods since 1999, and Hurricane Ida of 2021 was the latest. With all of the flooding that has occurred in Eastwick, we have experienced severe damage to our homes including outbuildings and landscapes and roads; power outages, water system outages, gas outages; disruption of transportation; in addition, these floods have caused severe environmental problems, although we have been informed by the EPA that there are no hazardous environmental problems in Eastwick. Plus, we should not rule out health problems that many residents believe were caused from experiencing the harmful side effects of these floods.

It is extremely devastating, distressful and frightening to see flood waters come rushing into your home. Dirty and muddy water rushing into the place where you live! It causes extreme and severe shock. One minute you're going about your normal daily routine and the next minute you see flood waters roaring into your backyard, and into your house. It is terrifying! There was no time to try to save any property inside, and you become afraid to even step into flood waters.

Trying to move our vehicle, in the midst of all the noise, confusion and rushing flood waters, to higher ground posed more problems with so many other people trying to do the same thing. Then there was the rush back to try to assess how far the flood waters had risen, and if the flood water was still rising. By then, the flood water was above my waist. I'm not a scary person but I am terrified of a lot of water, much, much water. Thankfully I

was helped to my front porch by young people who live on the same block. My prayer then was that the flood waters would not reach 6 feet.

Flooding in Eastwick has caused our home to lose so much property. We still have our lives, thank God. Besides the grand children's gaming equipment, we lost the following and much more.

Walls (wall studs
Sheetrock
Paneling (and molding)
Floors
Ceilings
Furniture and rugs
Shelving
Furnace
Air condition unit
Refrigerator
Washer and dryer
Fencing
Bar with table and stools
Electrical outlets
Outdoor lighting
Plumbing
Sinks
Toilet
Fireplace
Gas
Garage door
Exterior and interior doors
Lawn mower and equipment
Gas grill
Work and power tools
Furnishings, lamps, art work
Glassware
Electronic equipment
Records, cd's, video tapes,
Bicycles
Audio tapes
Food – refrigerated and pantry
Laundry products
Cleaning products

Eastwick needs help. There should be a warning system installed to help alleviate some of the many problems that come with flooding in Eastwick. The possibility of flooding in

Eastwick, especially when you hear the word “rain”, always keeps you on your toes, alert, attentive and vigilant. I can assure you that any mention of rain has me looking out of my kitchen windows.

We are pleading with government officials to please come up with a flood warning system for the flood plagued Eastwick neighborhood, and for Philadelphia. Money allocated to Philadelphia should and can be used to plan, secure, and install a flood warning system in Eastwick.

Response: We greatly appreciate your comment. Much work is underway regarding preparedness in Eastwick. The Office of Emergency Management is currently working towards an early warning system pilot with the Eastwick Community, and the Office of Sustainability is also developing a ‘resilient homes’ toolkit tailored specifically for Eastwick. Mitigation funds are intended to support implementation of strategies identified through ongoing work.

10. Public Comment: Hello, I apologize for the late submission of my suggestions and thoughts, but I hope that they may be considered. I would like to propose that the areas that were mainly flooded may have experienced such severe flooding due to the lack of native plant species around the rivers. Primarily, the Schuylkill River Trail and areas around the Schuylkill River are mainly made up of non-native lawn grasses with a shallow, but tight, root structure. That, along with being relatively flat, may have caused less water to be soaked into the soil and overflow into the surrounding areas.

Recently, I discussed this with several PHS (Pennsylvania Horticultural Society) workers and found that some of their native plant projects in the Philadelphia Navy Yard have done a much better job at dealing with flooding than the nearby lawn grass. Unfortunately, I have run out of time to do the appropriate research to find the statistics on the rate of water dissipation of lawn grasses compared to native plant species, but I do know that the root system of most native species of grasses, wildflowers, trees, and shrubs typically are larger and reach down deeper in the soil than lawn grasses. That allows the native species to store more water deeper in the soil more quickly.

Also, a potential shallow ditch can be dug along the Schuylkill trail to create a stormwater bioretention basin along the river. That may help with already common flooding along the Schuylkill River Trail.

After the initial implementation cost, almost all maintenance of native plant species can be completed by volunteer-coordinated events. For example, PHS helps manage Washington Avenue Green along the Delaware River which almost entirely consists of native plant species. According to several PHS employees, they only need to maintain the trail very infrequently. Maintenance of the native species is almost nonexistent.

Lastly, I would like to suggest that more neighborhoods and streets throughout the city use bioretention (EPA article is attached to this email) or output to designated areas with bioretention basins. Part of this issue may have been resolved if less water from neighborhoods uphill from the rivers were entering the sewers.

I hope that my email is considered for possible future flood prevention ideas, and I believe that it would be beneficial to conduct a small test along the Schuylkill River before another major weather event happens again.

Please let me know if any additional information is needed like reports or statistics.

Response: Thank you for your comment. “Green-first” solutions that incorporation elements of green infrastructure are prioritized in the CDBG-DR Action Plan. As laid out in the Eligibility and Selection Criteria for both the \$52 million Infrastructure Restoration and Improvement Program (4.6.4) and the \$15 million Resilient Communities Program (4.6.6), Green-first approaches that utilize best practices from the Green City, Clean Waters Initiative and the Office of Sustainability will be prioritized for funding. The city acknowledges the need for Green-first solutions including greater greenspace coverage, use of native flora, and increased bioretention infrastructure. Projects incorporating these elements will be evaluated on a case-by-case basis during the implementation phase of the plan.

11. Public Comment: Thank you for the opportunity to testify today. I am speaking this evening in my role as the Executive Director of the East Falls Development Corporation. Our organization is dedicated to the revitalization of the East Falls business district located on the Schuylkill Riverbank in lower northwest Philadelphia; we carry out this mission through small business technical assistance, comprehensive and community-driven neighborhood planning, and capital investments.

Due to our proximity to the Schuylkill River, our businesses and residents are particularly vulnerable to severe flooding - and the economic, social, and emotional impacts of Hurricane Ida remain almost two years later. Our riverfront business district took almost a year to fully recover, with multiple businesses being unable to reopen for approaching eight months - including two restaurants that serve as both neighborhood staples and destinations drawing commercial activity from throughout Philadelphia to East Falls. We know that the so-called 100 and 50-year storms are very likely to be more violent and frequent in the coming years. Our organization, together with our near neighbors, the Manayunk Development Corporation are taking proactive measures to increase mitigation strategies and reduce impacts. Earlier this year we drafted and released a flood mitigation toolkit for our neighborhood and with funding from DCED, we are proudly partnering with our neighbors at the Manayunk Development Corporation to conduct a flood mitigation study spearheaded by the engineering firm AKRF. This effort will help us bring together our neighbors and businesses to determine the highest impact improvements to protect our neighborhoods and reduce impacts from future flooding.

We are appreciative to have our city partners (PWD, Office of Sustainability, and others) engaged in this important work - and we are excited by the Hurricane Ida Action Plan and the significant investment it represents. We plan to work in tandem with the City on its implementation, as the work aligns closely with our hyperlocal Flood Mitigation and Preparation Study and the unique needs of East Falls and other riverbank neighborhoods. Specifically, we are motivated by funds being allocated towards long-term resiliency planning as well as business recovery assistance. Our organization stands ready to partner with the City to ensure our impacted small businesses in East Falls receive much-needed relief - and that our planning efforts are coordinated.

And like our friends at Manayunk, we hope the City will consider including our trails as part of the infrastructure improvements implemented through the Action Plan. The Schuylkill River Trail (SRT) runs through the heart of our East Falls neighborhood, drawing visitors and shoppers, creating community, encouraging outdoor recreation of all kinds, adding to our physical and emotional health, and serving as a key part of our natural ecosystem. And the SRT, including our new East Falls River Landing (a public non-motorized boat launch, fishing and bird-watching site) - underwent significant damage during Ida, and will do so again during any future flooding event.

Thank you again for your time and attention this evening, and we appreciate all that the City is doing to support and work with our East Falls businesses and neighbors.

Response: Thank you for your comment. “Green-first” solutions that incorporate elements of green infrastructure are prioritized in the CDBG-DR Action Plan. As laid out in the Eligibility and Selection Criteria for both the \$52 million Infrastructure Restoration and Improvement Program (4.6.4) and the \$15 million Resilient Communities Program (4.6.6), Green-first approaches that utilize best practices from the Green City, Clean Waters Initiative and the Office of Sustainability will be prioritized for funding. The city acknowledges the need for Green-first solutions including greater greenspace coverage, use of native flora, and increased bioretention infrastructure. Projects incorporating these elements will be evaluated on a case-by-case basis during the implementation phase of the plan.

12. Public Comment (Oral): Homeowner Repair Program - Do you need to put in an application? Submit to whom? How can you tell if repairs are tied back to Ida?

Response: Thank you for your question. To determine tie back to Hurricane Ida for the Homeowner Repair Program, we looked at FEMA Individual Assistance Applications and the calculated unmet housing need in the aftermath of Ida – estimated to be \$768 million. Regarding applications, we are still in the process of finalizing program details and requirements. Program details and requirements are anticipated to be finalized in early 2024.

13. Public Comment (Oral): Public Services – How much money is going to CDCs? And would they have to apply?

Response: Thank you for your question. The City recognizes Community Development Corporations (CDCs) as important organizations that can play a vital role in Hurricane Ida recovery. Due to this, CDCs are considered eligible entities under the Public Services allocation of the Action Plan. Under the plan in total, \$1 million is allocated to housing counseling, while \$2 million is allocated to Workforce Training. Eligible entities and projects will be evaluated on a case-by-case basis once program details have been finalized.

14. Public Comment (Oral): How does the proposed Homeowner Repair Program and Rental Assistance Program tie back to Ida?

Response: Thank you for your question. Hurricane Ida brought about historic flooding to the city of Philadelphia and had a profound impact on a number of structures throughout the city – including housing units. As part of the Hurricane Ida Action Plan, the city calculated the “Housing Unmet Needs” for Philadelphia communities and determined that there is \$768 million in aid needed for residents to fully recover from the housing impacts of Hurricane Ida. Both the Homeowner Repair Program and Rental Assistance Program will work to alleviate some unmet need for impacted Philadelphia residents.

15. Public Comment (Oral): Housing Repair Program - How does that address tangled title?

Response: A tangled title occurs when someone lives in a house but is unable to prove ownership because that person’s name does not appear on the deed. The Division of Housing and Community Development is aware that tangled title issues can affect residents’ ability to participate in some City programs, including the proposed CDBG-DR home repair program. Therefore, the City funds programs to help residents establish title to their home. CDBG-DR funding in the Public Services category may be utilized to increase funding for these important tangled title services.

16. Public Comment (Oral): Planning – Is there intention to examine expiration of HUD requirements for renters (affordability, senior housing, tax credits, etc.)?

Response: By City Council ordinance (Bill No. 221018), the Division of Housing and Community Development a public directory of privately owned, City, state, and federally- assisted affordable rental housing for low-and moderate- income households. This directory may be used for analysis, including estimates of which Affordable Housing Properties are at greatest risk of expiration or nonrenewal based on various factors. The City will explore ways in which these resources might support

or inform housing and community development programs, including the proposed CDBG-DR activities.

17. Public Comment (Oral): Why is the \$163 M available? Where did it come from? How will the DR Program address needs that aren't managed by CDCs?

Response: Thank you for your questions. The \$163 million is federal funding specifically for Hurricane Ida recovery granted from HUD to the City of Philadelphia through the Community Development Block Grant – Disaster. This grant allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2022 (Public Law 117-43) and the Continuing Appropriations Act, 2023 (Public Law 117-180). These federal dollars that the City may be used to do two things: address recovery needs from Ida and/or ensure that the City is more resilient to future disasters. The City intends to work closely with CDCs for program design and implementation.

18. Public Comment (Oral): Economic Revitalization – Can a business owner apply for support without having relation to SBA Merchants Fund?

Response: Thank you for your question. We are currently in the stage of developing program details and requirements for the Economic Revitalization Program. Program details are anticipated to be finalized in early 2024.

19. Public Comment (Oral): Is it necessary to have estimates of damage (experienced by homeowner)?

Response: Thank you for your question. While we are still in the process of finalizing program details and eligibility requirements for the Homeowner Repair Program. It is anticipated that we will develop program details in early calendar year 2024.

20. Public Comment (Oral): Planning – Does it cover preparedness (e.g. evacuation, transport seniors, etc.)?

Response: Thank you for your inquiry. The Hurricane Ida Recovery Plan allocates \$21 million for planning services aimed at boosting preparation for and resiliency to future disasters. The plan was put together in consultation with the Office of Emergency Management (OEM), who will continue to be a partner throughout the implementation period of the grant. Specific plans will be evaluated on a case-by-case basis. As described in the Action Plan, the aftermath of Hurricane Ida revealed needs tied to the City's preparedness and response to extreme weather events. The City recognizes the need to improve evacuation planning and protocols.

21. Public Comment (Oral): Elaborate on public engagement and outreach? Does this include local community organizations (e.g. Friends of...)

Response : Thank you for your interest in the public engagement and outreach component of the plan. As part of both City of Philadelphia values and HUD priorities, Citizen Participation is a vital component of the Hurricane Ida Recovery Plan. The CDBG-DR team has worked closely with various community stakeholder groups outlined in section 3.1 of the Action Plan.

In addition to this, we have put together a social media outreach campaign to advertise the public hearings we held August 8th as well as the public comment period for the plan that ran from July 14th to August 15th. We plan to continue expanding our partner organization list and develop new forms of community engagement going forward.

22. Public Comment (Oral): Comment on Infrastructure Program needing more money (specifically sewer).

Response: Thank you for your comment. The Infrastructure Program is allocated \$52 million in the Hurricane Ida Recovery Plan in order to repair and improve city infrastructure – including sewer, water, and stormwater infrastructure. Sewer infrastructure restoration activities are eligible under CDBG-DR and the City will explore eligible projects during implementation based on needs identified in the Action Plan.

23. Public Comment (Oral): Manayunk comment on Economic Recovery, Infrastructure, Resilient Communities, Flood Mitigation. They would like fortifications along the Tow Path as well as planning for Lower Main Street. There is a high business ownership turnover due to the floodplain location as well as a need for complete streets to improve the area.

Response: Thank you for your response. It is a City priority to reduce the impact of storm events going forward by using CDBG-DR funds. The Hurricane Ida Recovery Plan allocates \$52 million to infrastructure projects, including sewer, water, and stormwater infrastructure. There is an additional \$15 million allocated for Mitigation projects that will increase resilience to future disasters. We look forward to working closely with Manayunk in this process going forward.

24. Public Comment (Oral): The City should consider accessibility of homes and improving that as well as mitigation efforts for homeowners (moving boilers, other utilities, etc.)

Response: Thank you for your comment. The Hurricane Ida Recovery Plan includes \$42 million for homeowners to use to improve the resilience of their property going forward. Assistance also may be provided to make housing accessible for individuals living with disabilities as part of the program. Residents living with disabilities and other vulnerable groups are anticipated to benefit most from the program in

question. These property level mitigation efforts will be measured for eligibility with CDBG-DR priorities when the program details are finalized.

25. Public Comment (Oral): Senior Law Center - [Here](#)

Response: Thank you for your comments and for participating in the public hearing. Your comments, recommendations, and exhibits are noted. The City recognizes the outsized impact that Hurricane Ida had on senior citizens and understands they may face unique recovery challenges. The City is committed to aiding senior citizens in their post-storm recovery and forming partnerships with community and advocacy groups to focus on providing assistance to those who are at greater risk. We look forward to working alongside organizations like the Senior Law Center going forward.

26. Public Comment (Oral): Points out that Strawberry Mansion sits below Manayunk and contains many vacant lots. Basements are flooded often and mold is cited as a major issue in the neighborhood. Concerns about accessibility for residents as well.

Response: Thank you for your comment. Strawberry Mansion was one of the most affected neighborhoods in the City of Philadelphia in the aftermath of Ida. Pre-existing issues with flooding were exacerbated by the storm and put residents in precarious positions. As part of this plan conception, we have worked and organized with the Strawberry Mansion CDC as part of targeted community outreach to get an understanding of the neighborhood experiences and priorities that we can address through CDBG-DR.

Also, accessibility issues will be a top priority for infrastructure repair projects that receive CDBG-DR funds going forward. With \$52 million in federal dollars set aside for infrastructure repair and improvement, there are certain federal standards and best practices to ensure accessibility throughout the process (See section 4.6.4 of the Action Plan).

27. Public Comment (Oral): What are your thoughts on mitigation measures for waterfront development in the city? Navy yard investments as an example.

Response : Thank you for your question. There is \$15 million in funds set aside for mitigation projects. There are many different types of risk reduction projects that may be eligible under the four programmatic goals identified for the mitigation set-aside: Resilient Infrastructure, Resilient Households, Mitigation Planning, and cost-shares for Hazard Mitigation grants. This plan was put together in consultation with the City's Office of Sustainability (OOS), the Office of Emergency Management (OEM), and other City experts in flood risk and mitigation, who will continue to partner throughout the implementation period of the grant. Specific projects will be

evaluated on a case-by-case basis after eligibility requirements for this grant program are finalized.

28. Collaboration with Pennsylvania Volunteer Organizations After Disaster (PA VOAD) led to 23 discrete comments from residents on the contents of the Action Plan. Select comments as well as some overarching themes are included below:

- **Public Comment Theme:** We received multiple comments from VOAD-connected residents who articulated the need for assistance. Many expressed frustration about the way Ida assistance was handled by the city and federal organizations like FEMA.

Response: The City acknowledges the disproportionate impact Hurricane Ida had on vulnerable populations as well as the frustration residents may have with recovery services. To maximize the benefit to residents who most need assistance, the City is working extensively with a variety of partners to ensure best practices are used in program design and implementation going forward.

- **Public Comment Theme:** Multiple residents specifically asked if the CDBG-DR Action Plan Programs would result in cash benefits for affected residents.

Response: Program design elements (including award dispersal methods) are due to be finalized in early 2024. Cash benefits are not allowable under HUD's CDBG-DR program rules. With that said, vulnerable residents who were impacted by Ida (disabled, LMI, elderly) are anticipated to benefit most from both the Homeowner Repair Program and Rental Repair, Rehabilitation, and Construction Program

- **Public Comment:** High housing repair cost. My homeowner's insurance did not cover the damages caused by hurricane Ida. I still live with the damages of the hurricane Ida. I can't afford to repair it.

Response: Thank you for your comment. The CDBG-DR Action Plan Homeowner and Rental Programs are specifically intended to benefit Low-to-Moderate Income (LMI) residents who have unmet housing needs from the impacts of Hurricane Ida. Specific home damages will be evaluated for funding on a case-by-case basis after Program details and eligibility requirements are finalized in early 2024.

- **Public Comment:** I am a disabled veteran and live alone with my service dog. I had 6 inches of water, mud and sewage in my home from hurricane Ida. I learned to be prepared to have enough food and water for 3 days and a full tank of gas and food for your pets and service dogs. My home is still under repair from hurricane Ida. My insurance will not cover my repairs.

Response: Thank you for your comment and time. A core focus of the CDBG-DR Action Plan is helping vulnerable communities in the City of Philadelphia, including Low-to-Moderate (LMI) individuals, persons living with disabilities, and elderly residents. The \$42 million Homeowner Repair Program and \$10 million Rental Repair, Rehabilitation, and Construction Program may cover repairs to your property depending on eligibility standards that will be finalized by early 2024. Additionally, \$52 million is allocated for infrastructure repair that can help alleviate flood risk in your neighborhood going forward through improvements to sewer, stormwater, and water infrastructure facilities.

- **Public Comment:** I live in one of the worst hit areas in Philadelphia, “19132”. Before Ida I was about to buy a car so that I can drive for UBER and LYFT and after the disaster I had to take the money for the car to try to make repairs on the house but I didn’t have anywhere near the amount of money that’s needed. The house is in of repair, I fell behind on my utility bills, taxes and mold is a problem. The house is in need of almost complete repair. Hurricane Ida was a disaster indeed for me. It floods in the basement whenever it rains too. I need help.

Response: Thank you for your comment and time. A core focus of the CDBG-DR Action Plan is helping vulnerable communities in the City of Philadelphia, including Low-to-Moderate (LMI) individuals, persons living with disabilities, and elderly residents. The \$42 million Homeowner Repair Program and \$10 million Rental Repair, Rehabilitation, and Construction Program are anticipated to cover repairs to economically vulnerable residents impacted by Ida. Eligibility requirements are anticipated to be finalized in early 2024.

- **Public Comment:** Figure 5: Ida Impact By Zip Codes: I feel this information is incorrect, as I reside in 19142 zip code and experienced damage to my home. My roof and basement were damaged.

Response: Thank you for your comment. The figure you referred to is based on records of properties with verified losses from FEMA. This data is not exhaustive, but is an overall snapshot of who in Philadelphia experienced impacts during Hurricane Ida using best available data. The City recognizes the \$768 million in unmet housing need in the community, and will be designing the housing programs under the CDBG-DR plan to help vulnerable, impacted residents

29. Public Comment: Writing this email to share my feedback. I think the vast majority should be spent on PWD’s Green Stormwater Infrastructure (<https://water.phila.gov/gsi/>) which is both aesthetically beautifying neighborhoods, and serves a functional purpose to manage stormwater/reduce flooding.

Response: Thank you for your feedback. We have active collaboration with subject matter experts in the Philadelphia Water Department (PWD) to determine the most effective solutions possible. “Green-first” solutions that incorporate elements of green infrastructure are prioritized in the CDBG-DR Action Plan. As laid out in the Eligibility and Selection Criteria for both the \$52 million Infrastructure Restoration and Improvement Program (4.6.4) and the \$15 million Resilient Communities Program (4.6.6), Green-first approaches that utilize best practices from the Green City, Clean Waters Initiative and the Office of Sustainability will be prioritized for funding. The city acknowledges the need for Green-first solutions including greater greenspace coverage, use of native flora, and increased bioretention infrastructure.

30. Public Comment (Oral): Thank you for this opportunity to comment on the CDBG-DR Action Plan. I am a Board member of the Eastwick Friends and Neighbors Coalition, and Secretary of the Board of the Friends of Heinz Refuge. Please find my comments below.

- The residents of Eastwick sustained much damage from Hurricane Ida. The CDBG-DR Hurricane Ida Action Plan showed that Manayunk and Strawberry Mansion were more affected by Hurricane Ida than Eastwick, and Pennypack Creek was more affected than Darby or Cobbs Creeks. According to your report, Eastwick was not in the most impacted zip codes. What is helping to mitigate flooding at Eastwick? This indicates that The John Heinz National Wildlife Refuge is functioning to mitigate storm flooding, and that Philadelphia should allow the John Heinz National Wildlife Refuge to subsume the 128-acre land parcel that would divert more flooding from Eastwick.
- A Multi-agency Resource Center (MARC) closer to Eastwick is needed where residents impacted by storms that bring flooding can go to report damages and access recovery resources. Also need temporary housing near Eastwick where evacuees can find shelter until flooding remits.
- Eastwick and other flood-prone communities need signage, similar to that of tsunami evacuation directions, amongst neighborhoods to direct people to the best evacuation routes and temporary shelters.
- The availability of flood and disaster resources of the City and its universities, State and Federal agencies, private businesses and charities such as Goodwill, need to be listed and updated at least annually by mail to households as well as the e-notification system to all households.
- A faster opening of Recovery Centers for homes and businesses would help – Ida flooding began Sept. 1 and the Roxborough Recovery Center opened Sept. 27 according to the CDBG Action Plan report.
- The communities need more participation of community members in these resources and to attend meetings regarding the availability of Prevention, Preparedness, and Recovery resources. A strong outreach at community festivities, such as the Eastwick Community Day, would help. Could provide incentives for community members to bring neighbors to the information booths.

Thank you for your efforts to reach all Philadelphia Communities and respond to their increasing flood risks.

Response: Thank you for your comment. Regarding impact across neighborhoods, figures are based on records of properties with verified losses from FEMA. This data is not exhaustive but is an overall snapshot of who in Philadelphia experienced impacts during Hurricane Ida. There are ongoing, multi-agency efforts to work with stakeholders in Eastwick to develop consensus on a comprehensive resilience strategy, including John Heinz National Wildlife Refuge. The City is also engaged in discussions to increase resource availability and storm event communications and response. Mitigation funding will help support resource availability and preparedness. As described in the Action Plan, the aftermath of Hurricane Ida revealed needs tied to the City's preparedness and response to extreme weather events. The City agrees there is a need to improve evacuation planning and protocols.

31. The city received a statement from 38 residents that read the following (from Clean Air Council):

Public Comment: Please make home repair funds allocated in the City of Philadelphia's Community Development Block Grant Disaster Recovery (CDBG-DR) program available to residents living in the 100-year flood plain.

The City is proposing two necessary housing rehabilitation programs, one for homeowners and one for small landlords, but is preventing any of these housing rehabilitation funds (over \$50,000,000) from being used to repair properties in the floodplain. The City's proposed Public Action Plan claims that residents who live in the floodplain "will be addressed under a separate program," but does not identify or describe that program. Southwest Philadelphians living in the 100-year floodplain should not be excluded from these necessary home repair funds. The City appropriately recognizes safe housing as the largest need associated with the damage of Hurricane Ida and those living in the 100-year floodplain are at the highest risk.

The City should also use a portion of this funding to expand greenspace in densely populated row home neighborhoods that lack adequate drainage. The City could acquire vacant lots in neighborhoods and preserve them as open, recreational space. The Action Plan appropriately recognizes that "new market-rate and infill development" is not affordable and acquiring vacant lots in between rowhomes would help maintain housing affordability while increasing greenspace and drainage in the vulnerable neighborhoods. This is a unique opportunity to make a long-term, appreciating investment in public property with this one-time source of funding. This program would also have minimal administrative costs and create jobs maintaining and landscaping public spaces.

The City's plan to update necessary sewer and water treatment infrastructure is vital to Philadelphia's long-term ability to provide clean drinking water in the context of the increasing effects of climate change, specifically sea level rise and increased precipitation. However, purchasing and greening vacant lots in dense Philadelphia neighborhoods will ensure that residents can directly benefit from the current federal relief funds in the form of recreational opportunities that would not be provided by sewer and water treatment infrastructure improvements. Greening vacant lots would also provide opportunities for native plant landscaping opportunities that would promote local ecology while expanding drainage and reducing the heat island effect, both of which are listed as significant risks in the proposed Action Plan.

Because greening vacant lots in dense row home neighborhoods would serve to maintain housing affordability, this use of federal funding would be directly in line with the City's responsibility to minimize displacement. Expanded local greenspaces would prevent displacement by promoting affordability, avoiding potentially damaging infill construction, increasing recreational opportunities, and reducing the damaging effects of increased heat and precipitation caused by climate change.

Response: Thank you for your comment. Your concern about housing located in the floodplain is noted. In addition to our outreach efforts, we are in active collaboration with subject matter experts from multiple organizations and city departments to implement best practices for the Action Plan. We will continue to analyze options for the housing programs, so your feedback is appreciated.

Regarding the purchasing and greening of vacant lots, "Green-first" solutions that incorporate elements of green infrastructure are prioritized in the CDBG-DR Action Plan. As laid out in the Eligibility and Selection Criteria for both the \$52 million Infrastructure Restoration and Improvement Program (4.6.4) and the \$15 million Resilient Communities Program (4.6.6), Green-first approaches that utilize best practices from the Green City, Clean Waters Initiative and the Office of Sustainability will be prioritized for funding. Specific project proposals will be evaluated on a case-by-case basis once program details are finalized in 2024.

32. Public Comment (Oral): I am a resident of the Eastwick Community in the city of Philadelphia. I have resided in this community for more than twenty years and been the victim of the aftermath of two major flooding events since living here. The first was hurricane Floyd September 1, 1999 the most recent hurricane Isaias August 4, 2020. During both of these floods I received damage to my home and incurred major losses. During Floyd I watched as my car was engulfed by water and the neighbors' cars from the beginning of the block were pushed down the block in front of my home and piled on top of each other. I watch from my doorway as the water broke around a corner and took out the side of the home across from me. Many people's possessions lined Lindbergh blvd tv's

sofas and other furniture. This time I didn't lose the car. I did lose the entire contents of my basement living area. Electronics, furniture laundry room, bathroom.

My entire HVAC system along with the hot water heater and personal items. Many of my neighbors lost their car again. After both of these incidents I attended the community meetings gave my information filled out forms and answered questions from city officials including the emergency management team. I'm still waiting for a resolution or some type of follow up to all the forms questions and images I submitted of the damage to my home. I'm a taxpayer and registered voter. Why is my community repeatedly overlooked and forgotten? How is that resources that are made available to other communities continue to be lacking when it comes to the Eastwick community? How is that we were not told that if your home is severely impacted/ damaged from a disaster the full amount of your property taxes is not required to be paid. The city has my information on file. I feel like we get victimized at every turn. Other communities receive almost immediate aid. Eastwick residents were offered SBA loans. Yes, the interest rate was low. But it's still another bill.

We had contractors with inflated prices showing up with loan papers telling you all-you need to do is sign if their \$40,000 cost is too high. Then you have to contend with the insurance companies and the premiums that more than triple. We need a break! We are constituents of the commonwealth just like those other communities who receive aid and don't wait years to see it. The community of Eastwick rightfully deserves to be a part of the funding and flood mitigation purposed for hurricane Ida victims. We continue to face flooding concerns. Our cries have gone unheard. Please let this time be different. Attached with this message are images and video I took from my front door.

Response: Thank you for your comment. There are ongoing, multi-agency efforts to work with stakeholders in Eastwick to move towards a comprehensive flood resilience strategy. The Office of Sustainability is developing a 'resilient homes' toolkit tailored specifically for Eastwick as part of the "Eastwick: From Recovery to Resilience" programming. Mitigation funds are intended to support implementation of strategies identified through this current work.

33. Public Comment (Oral): Community Legal Services official statement - [Here](#)

Response: Thank you for your comment. We recognize the disproportionate impacts that disasters have on vulnerable communities in Philadelphia, and are taking active steps to ensure equity is a central component of the Action Plan. The concerns raised about making provisions friendly and equitable to all homeowners. Section 3.5.6.2 of the Action Plan outlines the program's emphasis on green building standards to boost resilience in the long run.

Your comments on the infrastructure program have also been noted. The Philadelphia Water Department (PWD) was consulted extensively in determining unmet water, stormwater, and sewer infrastructure needs in the city as seen in

section 2.2.5.1 of the plan. It is anticipated that PWD will continue to be a major partner in plan implementation going forward as well. The \$52 million infrastructure allocation can be used on projects repairing and improving water, sewer, and stormwater infrastructure. Projects will be evaluated on a case-by-case basis once program details have been finalized.

34. Public Comment (Oral): Good evening. I am comment on the grant and for 7800 block of Saturn place. I feel like this area should be taking in serious consideration because us as a community lose so much when the floods occur.

Response: Thank you for your comment. We recognize that vulnerable areas must be prioritized in the CDBG-DR Action Plan design and implementation. Program guidelines are anticipated to be finished in early 2024, and project eligibility will be evaluated on a case-by-case basis.

35. Public Comment (Oral): I am writing to submit a comment about the current draft of the CDBG-DR Action Plan. My comment relates to funding allocation for managing combined sewer overflow in the Schuylkill River.

I see that the current draft of the plan allocates funding for a number of specific sites, and indicates additionally that other sites may be addressed. I wanted to ask whether it would be possible to specifically allocate funding for addressing both management and testing of combined sewer overflow in the Schuylkill River.

Bartram's Garden has done some work around asking the PA DEP to test the water in the Schuylkill (see here, for instance), but as it stands, to the best of my understanding, there is not regular water testing in the Schuylkill River, and the water from the river regularly floods the Schuylkill Trail, where thousands of people walk and bike every day. It would be helpful to know what health risks that routine floodwater causes and what options there might be for addressing some of it.

As we discussed at last week's meeting, the CDBG-DR funding could not address the full extent of the Schuylkill's CSO problem, but it could certainly go a long way to understanding and quantifying the problem such that future funding could be allocated to address it. (In other cities, managing CSO has been a precondition of riverside development, but that has not been the case in Philly.) As more and more development happens along the Schuylkill, it would seem that there would be quite a few stakeholders who would want to know more about the risks associated with Schuylkill River combined sewer overflow.

I am happy to discuss this further if that would be useful.

Response: Thank you for your comment. The Schuylkill River experienced historic flooding as a result of Hurricane Ida, so ensuring impacted areas are resilient to

future flood events and disasters is a priority of the plan. There is \$21 million allocated to Planning activities in the Action Plan, as well as \$15 million for Mitigation activities that may be used for projects that boost resilience. There is also a \$52 million infrastructure allocation that can be used to improve sewer, water, and stormwater infrastructure going forward. Projects and specific solutions, including those you propose will be evaluated on a case-by-case basis.

36. Public Comment (Oral): Fair Housing Rights Center official statement - [Here](#)

Response: Thank you for your comment. Section 2.1.5 of the Action Plan describes the emphasis on ensuring fair housing practices for Ida recovery programs. The City is committed to utilizing its allocated funds to benefit as many residents as possible, with a particular focus on low- and moderate-income (LMI) individuals, vulnerable populations, protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas of poverty, and historically underserved communities. Section 2.1.5 includes a comprehensive demographic analysis focused on the challenges faced by vulnerable populations including but not limited to unhoused individuals, people with limited English proficiency, and persons with disabilities. Additionally, we have noted your comment regarding housing counseling. The Plan allocates \$1 million to housing counseling services going forward. Individual projects applying for funds under the program will be evaluated on a case-by-case basis once program details have been finalized in early 2024.

37. Public Comment (Oral): Overbook Environmental Education Center - [Here](#)

Response: Thank you for your comment. We recognize the importance of social equity and helping the most vulnerable communities in Ida recovery. Section 2.1.5 outlines the drive to incorporate equitable considerations for vulnerable populations, protected classes under fair housing and civil rights laws, racially and ethnically concentrated areas of poverty, and historically underserved communities in Philadelphia. The \$163 million in funds will be spent to aid recovery from Ida and boost long-term resilience to climate change and future disasters for the most at-risk communities in the City. Your specific suggestion of Green Zone pilots has been noted and will be explored along with other project proposals once eligibility standards have been finalized.

5.4 Data Sources/Methodologies

Owner Occupied Households:

- 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
- Major-High:
 - \$15,000 to \$28,800 of FEMA inspected real property damage
- Severe:
 - Greater than \$28,800 of FEMA inspected real property damage

Renter Occupied Households:

- Minor-Low:
 - Less than \$1,000 of FEMA inspected personal property damage
- Minor-High:
 - \$1,000 to \$1,999 of FEMA inspected personal property damage
- Major-Low:
 - \$3,500 to \$4,999 of FEMA inspected personal property damage
- Major-High:
 - \$5,000 to \$8,999 of FEMA inspected personal property damage
- Severe:
 - Greater than \$9,000 of FEMA inspected personal property damage

2014-2018 CHAS

2022 HUD LMISD Calculations

Amtrak

Center of Disease Control (CDC) Social Vulnerability Index

City of Philadelphia Department of Commerce

City of Philadelphia Department of Public Property

City of Philadelphia Parks & Recreation

City of Philadelphia Department of Streets

City of Philadelphia Office of Emergency Management (OEM)

City of Philadelphia Office of Homeless Services (OHS)

City of Philadelphia Office of Immigrant Affairs

Delaware Valley Regional Planning Commission (DVRPC) Purpose of the Indicators of Potential Disadvantage (IPD)

FEMA IA Data

FEMA PA

Federal Highways Administration, PA Division

HUD Comprehensive Housing Market Analysis

HUD FY 2023 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data

National Flood Insurance Program (NFIP)

National Park Service

Pennsylvania Department of Transportation, Region 6

Philadelphia Housing Authority (PHA)

Philadelphia Water Department (PWD)

Small Business Administration (SBA) Disaster Loan Data

The Merchants Fund (TMF)

U.S. Bureau of Labor Statistics

U.S. Census Bureau, 2021 ACS 5-Year Estimates

U.S. Religion Census

5.5 Important Definitions and Terms

AMI: Area Median Income

CBDO: Community Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant- Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CP: Participation

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting System

FEMA: Federal Emergency Management Agency

HCD Act: Housing and Community Development Act of 1974, as amended

HMGP: Hazard Mitigation Grant Program

IA: (FEMA) Individual Assistance

LIHTC: Low-Income Housing Tax Credit

LMI: Low and moderate-income

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of general local government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

5.6 Standard Form 424

The **Standard Form 424 (SF-424)** is a required application form for federal assistance. It serves as a cover sheet for pre-applications and applications submitted for federal funding, capturing essential information about the applicant and the funding request. SF-424 can be found at the link below.

[Application for Federal Assistance \(SF-424\)](#)