



# CDBG-DR Action Plan Summary

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Community Development Block Grant-Disaster Recovery (CDBG-DR)  
City of Philadelphia  
Amendment #4 (Substantial)  
Submitted to HUD: xx/xx/xxxx  
Effective Date: xx/xx/xxxx

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## 1.1 Introduction

This document summarizes the City of Philadelphia’s [Community Development Block Grant-Disaster Recovery \(CDBG-DR\)](#) Action Plan for Hurricane Ida, including:

- Disaster Impact
- Unmet Needs, and
- Proposed Activities.

To request a translation of the complete Action Plan, please email [CDBG-DR@phila.gov](mailto:CDBG-DR@phila.gov), or call 215-686-2643. Interpretation and translation are provided free of charge.

The City submitted its initial Action Plan to HUD for review on August 21, 2023. HUD approved the City’s Action Plan on October 19, 2023.

## 1.2 CDBG-DR Overview

In 2022, the U.S. Department of Housing and Urban Development (HUD) announced that the City of Philadelphia would 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. 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 \(Public Law 117-180\)](#).

## 1.3 Action Plan Amendment Overview

Action Plan amendments serve as a way to propose revisions to CDBG-DR Action Plans in order to add or clarify information; change or add additional activity or program benefits; or reduce, increase, or reallocate funding. Amendments are categorized as either substantial or non-substantial.

### Substantial Amendments

Substantial amendments meet the following thresholds:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement;

- Or the allocation or reallocation of a monetary threshold specified by the grantee in their action plan.

Residents will be provided with reasonable notice and an opportunity to comment on proposed substantial amendments to the Action Plan, as required by HUD. A notice and translated copies of the proposed substantial amendment will be posted on the City’s CDBG-DR website. Copies will be provided upon request at the City, if otherwise not accessible for review by any residents. Residents will be provided with no less than 30 days to review and comment on the proposed substantial amendment.

**Non-Substantial Amendments**

Proposed amendments with minor changes that do not materially alter activities are eligible beneficiaries are considered non-substantial. Non-substantial amendments are not subject to legal notice and public comment requirements.

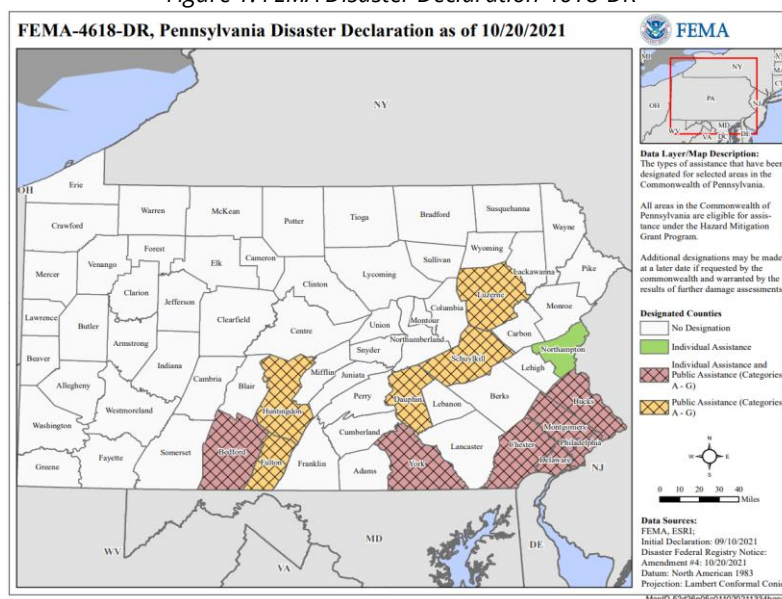
**Amendment 4 Summary**

Section and Title	Description of Change
4.6.3 Ida Business Assistance Program	Update program details to allow indirect tie-back eligibility
4.6.5 Mitigation Program	Update program details

A 30-day public comment period will ensue 30 days after the legal notice for Proposed Action Plan Amendment #4 is posted online.

**1.4 Disaster-Specific Overview**

Figure 1: FEMA Disaster Declaration 4618-DR



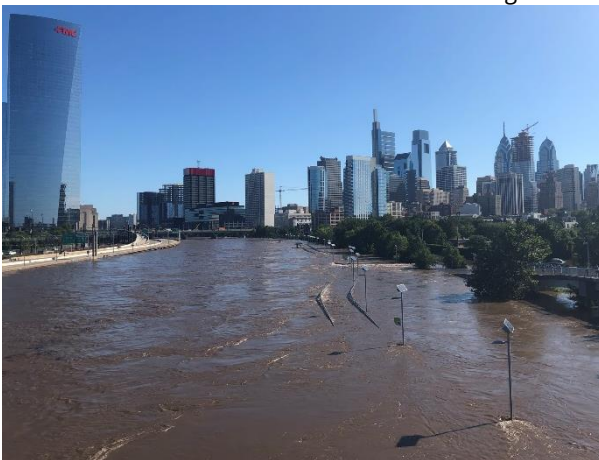
In September 2021, Hurricane Ida, which was later downgraded to a tropical storm, reached southeastern Pennsylvania. The Philadelphia area experienced heavy rains, high winds, and severe flooding. The rainfall rates and flooding impacts witnessed during this event were unprecedented, with certain parts of the city receiving between 3.97 to 5.69 inches of rain within a twelve-hour period, and some neighborhoods experiencing such levels of rainfall in as little as three to six hours. In Northwest Philadelphia, rainfall exceeded three-and-a-half inches within a three-hour period of the event and nearly five inches within a six-hour period. This excessive rainfall overwhelmed the local stormwater management systems and waterways, leading to widespread flooding across the region. The City's water gauges, which monitor the water levels in six major waterways, collected data on flood heights throughout the event. Both the Schuylkill River and Pennypack Creek gauges recorded water levels that surpassed the major flood stage. For specific flood height information for each of the monitored waterways, please refer to the table provided below.

Table 1-1: Water Levels

Body of water	Highest level during Ida	Major flood stage
<b>Schuylkill River</b>	<b>16.35</b>	<b>15.5</b>
Cobb's Creek	2.52	Not Available
Wissahickon Creek	9.34	Not Available
Delaware River	9.72	10.2
<b>Pennypack Creek</b>	<b>14.57</b>	<b>11</b>
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. The flood heights recorded by the City's water gauges serve as a testament to the magnitude of the event and its impact on the region.

Figure 2: Flood Impacts



Schuylkill River looking north



Schuylkill River flooding

### 1.4.1 Disaster Impacts and Funding Needs

Based on the City's initial analysis, City needs for CDBG-DR funding can be grouped into five main categories:

- Water, Sewer and Stormwater Infrastructure Damage and Vulnerability
- Public Infrastructure and Critical Facility Resiliency
- Single-Family Homes, Small Buildings, and Affordable Housing
- Local Businesses Impacts
- Recovery and Resiliency Planning

#### **Water, Sewer and Stormwater Infrastructure Damage and Vulnerability**

The impact of Hurricane Ida 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.

#### **Public Infrastructure and Critical Facility Resiliency**

Hurricane Ida significantly impacted Philadelphia's aging infrastructure, resulting in disruptions to transportation and the closure of important parks and recreational assets. The storm's impacts 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.

*Figure 3: Ida-Impacted Trails and Parks Infrastructure*



### **Single-Family Homes, Small Buildings, and Affordable Housing**

Hurricane Ida had a significant impact on small 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 Federal Emergency Management Agency (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 Individual Assistance.

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.

### **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. 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.

*Figure 4: Manayunk after Ida*



## 1.5 Summary

To fulfill the requirements of this allocation, the City must submit an Action Plan that identifies its unmet recovery and mitigation needs. This Action Plan 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 fair 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 vulnerable communities, including those with low to moderate income.

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 has 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 will provide residents with reasonable notice and opportunity to comment on the Action Plan and its substantial amendments. The City will convene at least one public hearing on the draft CDBG-DR Action Plan after being posted on its disaster recovery website for public comment and before submission to HUD. Notice of all hearings will follow the guidelines established in the City's CDBG-DR Citizen Participation Plan. The City has published this draft CDBG-DR Action Plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan will remain 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) jointly oversee administration of the CDBG-DR program. While Finance and DHCD are the primary entities administering the grant, implementation is coordinated between numerous City agencies including but not limited to the Managing Director's Office (MDO), Mayor's Office, Philadelphia Water Department (PWD), Commerce Department, and Philadelphia Parks and Recreation (PPR). The City will continue citizen engagement efforts throughout the duration of this grant and will adjust as necessary.

## **1.6 Unmet Need and Proposed Allocation**

The City used 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 percent and 38 percent respectively. These estimates still need to be completed. The City utilized publicly available FEMA Individual Assistance (FEMA IA) data, publicly available Small Business Administration data, internal FEMA Public Assistance (FEMA PA) data along local data sources.<sup>1</sup> The City awaits FEMA and Small Business Assistance (SBA) data sets from HUD to complete the unmet needs assessment. In addition, the City continues to work with local organizations to calculate a more accurate value of unmet infrastructure 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.

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<sup>1</sup> 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.

Table 1-2: Unmet Needs

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%
<b>Total</b>	<b>\$1,300,780,419</b>	<b>100%</b>	<b>\$163,204,000</b>	<b>100%</b>

Table 1-3: 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	Ida Business Assistance 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%
<b>Total</b>		<b>\$163,204,000</b>	<b>100%</b>	<b>100%</b>

## 1.7 Disaster Recovery and Resilience Program

### Budget

\$42,138,100

### Activity Description

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.

### **Program Responsible/Administering Entity**

- City of Philadelphia Division of Housing and Community Development (DHCD)
- Subrecipients:
  - Philadelphia Housing Development Corporation (PHDC) will implement eligible homeowner repair activities.
  - Designated Neighborhood Advisory Committee (NAC) organizations serving most impacted zip codes will conduct outreach activities to promote implementation. Designated NACs include Strawberry Mansion Neighborhood Action Center, Inc.; The Enterprise Center Community Development Corporation; Hunting Park Community Revitalization Corp.; Hispanic Association of Contractors & Enterprises; and Greater Philadelphia Alliance Social Service Center, Inc.

### **Eligibility**

#### 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.
- Must be on current mortgage or be on a payment plan.

#### 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.

### **Awards**

The maximum amount of assistance available to an applicant is \$150,000. Applicants may receive additional assistance provided the applicant has been unable to obtain other sources of assistance.

The City intends to provide assistance in the form of grants to fund repairs and resilience upgrades performed by PHDC-procured contractors. 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.

## 1.8 Rental Repair, Rehabilitation, and Construction Program

### Budget

\$10,000,000

### Activity Description

The program will assist eligible owners of rental properties to rehabilitate, repair, and construct 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.

### Eligibility

#### Property

- Must **not** be located in a floodplain.
- Costs for rehabilitation and construction 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.

#### Applicant

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 to rehabilitate the property.

### Awards

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.

## 1.9 Ida Business Assistance Program

### Budget

\$5,000,000

### Responsible Entities and Program Partners

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

### Activity Description

The City will implement the Ida Business Assistance Program (IBAP) to provide grants to eligible small businesses and nonprofits that can prove business impacts resulting from Hurricane Ida.

The program will achieve the following objectives:

1. Support recovery from Ida’s disaster impacts; and
2. Restore and improve the local economy through Low-to-Moderate Income (LMI) Job Creation/Retention (LMJ), LMI Area Benefit (LMA), and/or Microenterprise (LMCMC).

### Eligibility

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

- Physically located within the City of Philadelphia;
- Able to demonstrate impact through one of the following pathways:
  - Direct Disaster Tie-Back – individual physical and/or financial impact documented), or
  - Geographic Impact and Economic Revitalization – area-level disaster impact documented, and business located within the impacted geography
    - Includes new businesses or businesses that opened after the storm
- Demonstrates eligible, unmet financial need after accounting for all other funding sources;
- Eligible to use SAM.gov to receive federal assistance;
- Compliant with local, state, and federal regulations; and
- Does not have outstanding taxes due to the City.

[Businesses that were not open and operating during Hurricane Ida may be eligible for the Geographic Impact pathway in the future. Businesses that were open and operating during the disaster will be prioritized for assistance.](#)

### **Awards**

The grant assistance from IBAP will range from \$20,000-\$150,000 per applicant. As described in [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.

## **1.10 Infrastructure Program**

### **Budget**

\$52,138,100

### **Activity Description**

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.

### **Eligibility**

The program will be administered and implemented by the City of Philadelphia. The Infrastructure Program identifies infrastructure as including, but not limited to, the following types of projects: streets, water and sewer facilities, playgrounds, 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.

### **Awards**

The expected minimum program assistance available is \$500,000 and the expected maximum assistance is \$50 million. 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.

## **1.11 Mitigation Program**

### **Budget**

\$10,000,000 of the \$21,287,000 Mitigation Set-Aside is available for hazard mitigation projects related to infrastructure.

### **Activity Description**

This program, in line with HUD’s Mitigation Set-Aside requirements, will fund hazard mitigation projects that aim to strengthen facilities, structures, and communities to make them less vulnerable to future disaster impacts. Funded activities must be identified in the City’s CDBG-DR Action Plan Mitigation Needs Assessment or the City’s All-Hazards Mitigation Plan (HMP).

Selected projects do not need to have direct tie back to Hurricane Ida but should focus on reducing long-term risk and increasing resilience to future disasters citywide. Eligible activities include acquisition of property; construction, reconstruction, or installation of public works; and/or other improvements like green infrastructure, flood control and drainage system upgrades, or floodproofing of critical facilities.

Program funds can be used to fulfill 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.

### **Eligibility**

The program will focus on:

1. 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;
2. Protecting publicly funded recovery investments in impacted communities;
3. 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
4. Promoting 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.

### **Awards**

The expected minimum program assistance available is \$5,000,000 and the expected maximum assistance is \$10,000,000. 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.

## **1.12 Planning**

### **Budget**

\$21,480,600

### **Activity Description**

The City will offer planning 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.

### **Eligibility**

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, and
- 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, HUD-defined vulnerable populations, and historically underserved communities; and
- Proposed project will include a path for adopting and implementing the plan.

### **Awards**

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.

## **1.13 Public Services – Housing Counseling**

### **Budget**

\$1,000,000

### **Activity Description**

The City will offer grants to subrecipients to deliver housing counseling support in conjunction with housing activities.

### **Eligibility**

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

### **Awards**

The maximum amount allocated to subrecipients will be \$1,000,000 and detailed in the program guidelines.

## **1.14 Public Services – Workforce Training**

### **Budget**

\$2,000,000

### **Activity Description**

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.

### **Responsible Entity:**

PowerCorpsPHL will partner with the City as a subrecipient.

### **Awards**

The maximum amount allocated to subrecipients will be \$2,000,000 and detailed in the program guidelines.

## **1.15 Administration**

### **Budget**

\$8,160,200

### **Activity Description**

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.

## **1.16 Public Comment Period**

The City has published its full CDBG-DR Action Plan on [its website](#) and accepted public comments for a 30-day from Friday, July 14, 2023 to Tuesday, August 15, 2023. Citizens were notified through public announcements, City communications, and newspaper publications.

The City received comments via email and mail at:

Email-

[CDBG-DR@phila.gov](mailto:CDBG-DR@phila.gov)

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

Any updates or changes made to the Action Plan in response to public comments will be clearly identified in the Plan. Additionally, a summary of comments on the Plan or substantial amendment, and its corresponding response, will be uploaded in HUD's Disaster Recovery Grant Reporting system (DRGR) with the Action Plan.