

THE CITY OF BIRMINGHAM, ALABAMA



CDBG-DISASTER RECOVERY ACTION PLAN

DRAFT FOR PUBLIC REVIEW

Proposed Uses of Supplemental CDBG Disaster Recovery Grant Funding
Authorized by the Consolidated and Further
Continuing Appropriations Act 2012
(Public Law 112-55)

U.S. Department of Housing and Urban Development
Docket No. FR-5628-N-01
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Executive Summary

The City of Birmingham, Alabama's Department of Community Development has prepared this Action Plan for the Community Development Block Grant (CDBG) Disaster Recovery Grant. This Action Plan will be used by the City of Birmingham to provide \$6,386,326.00 in CDBG funding to help restore and rebuild the area of Birmingham that was most impacted by the April 27th Presidentially declared natural disaster.

On April 27, 2011, Alabama was hit by 62 tornadoes which took the lives of 248 people, damaged or destroyed 23,000 homes, and ruined hundreds of other structures, including commercial, industrial and governmental structures. Two 'waves' of storms hit Birmingham on April 27th---one in the morning that moved in a west-to-east direction and damaged properties from Five Points West, West End, Smithfield, Northside, East Birmingham, East Lake and Roebuck; and a second storm, later classified as a F-4 tornado, which hit Birmingham at about 6 pm the same date. This second storm smashed into the Pratt City Community and the Hooper City Neighborhood. Over 2,200 (83%) of the 2,794 homes damaged in Birmingham were damaged in the Pratt City Community.

Immediately after the storms, recovery centers were setup throughout the City of Birmingham so that individuals impacted by the storms could apply for assistance, meet with Small Business Administration loan specialists, get advice about how to proceed with insurance claims, and get information about available federal and state assistance. The Alabama EMA and FEMA communicated, coordinated, and collaborated with disaster response agencies, volunteer groups and faith-based organizations to help those individuals who were impacted by the storms. Even with the assistance of previously mentioned outreach efforts many citizens have been left with a need for more assistance in order to bring their homes/lives back to pre- April 27th conditions. In order to assist the citizens in the City of Birmingham an Action Plan has been developed.

This Proposed Action Plan describes:

- The effects of the storm damage and the City of Birmingham's recovery needs;
- The Citizen Participation process;
- The short and long-term plans;
- Proposed projects to be funded with the Disaster Recovery Grant allocation;
- Monitoring and prevention methods to be used; and
- Grant administration standards

Federal Appropriation Associated With This Plan

The City of Birmingham has been designated a Disaster Recovery Grant Recipient “for the purpose of assisting recovery in the most impacted and distressed areas declared a major disaster in 2011 under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.).

Definitions and descriptions contained in the Federal Register are applicable to this funding. Additionally, all regulations associated with the CDBG Program apply to this funding with the exception of those waivers presented in the Federal Register: FR-5628-N01 dated April 16, 2012.

The Impact of the Storms and Assessment of Birmingham’s Recovery Needs

On April 27, 2011, Alabama was hit by 62 tornadoes which took the lives of 248 people, damaged or destroyed 23,000 homes, and ruined hundreds of other structures, including commercial, industrial and governmental structures. At least 2,794 of the damaged/destroyed homes were located within the City of Birmingham, Alabama. Within 48 hours after the storms of April 27, 2011, City Building Inspection staff completed a block-by-block assessment of damages to structures as a result of these storms. This assessment identified 1,859 structures in the City of Birmingham that suffered structural damage. These structures included the above-referenced 2794 dwelling units (some structures included multi-family residences), along with numerous commercial properties. The inspectors also assessed the percentage of damage to each structure and recorded that data by street address. These damage estimates were then compared to Jefferson County Tax Assessor’s records. By multiplying each property’s percentage of damage by the Tax Assessor’s valuation for the structure, it was determined that there was a total dollar amount of physical damage to structures in the City of Birmingham of \$44,200,166.75.

Two ‘waves’ of storms hit Birmingham on April 27th---one in the morning that moved in a west-to-east direction and damaged properties from Five Points West, West End, Smithfield, Northside, East Birmingham, East Lake and Roebuck. The big storm—an F-4 tornado hit Birmingham at about 6 pm on the 27th. This second storm smashed into the Pratt City Community, and the Hooper City Neighborhood. Over 2200 (83%) of the 2,794 homes damaged in Birmingham were damaged in the Pratt Community!

This fact alone speaks to the concentration of the storm’s level of intensity and damage in the Pratt Community. However, the damage in Pratt was not limited to residences. In addition to the devastation of residential neighborhoods in Pratt, the Storm also slammed into City infrastructure, destroying the neighborhood fire station on Dugan Avenue and significantly damaging the Public Library located at the intersection of Dugan Avenue and Hibernian Street. Power lines were down everywhere, gas leaks were evident throughout as structures were ripped from their foundations severing gas lines. For nearly 12 months following the storms, the community endured wave after wave of heavy equipment ---trucks, bulldozers, backhoes, etc. to haul away debris, to demolish remaining structures, to repair utility systems, and generally repair infrastructure. The combination of the storms and the subsequent waves of heavy equipment have further damaged the infrastructure by tearing up roads, curbs and sidewalks.

Within weeks after the storms, the City invited the American Institute of Architects (AIA) to come to Birmingham with a RUDAT team to develop a plan for the redevelopment of the devastated Pratt Community. The RUDAT team spent four days in August 2011 intensely working to assess problems, opportunities and strategies to re-build the damaged Pratt Community. Its report, published in October 2011 identified a number of key opportunities and strategies. A number of their strategies focused on the North Pratt Neighborhood. North Pratt, along with Smithfield Estates were the two neighborhoods most severely damaged by the storms. Smithfield Estates is located to the east of Hwy 78 and is a newer (70s and 80s) neighborhood that is almost exclusively residential. Its population is more moderate-to upper moderate income. Smithfield Estates is heavily automobile reliant. North Pratt, on the other hand, is an older neighborhood in terms of housing stock and development patterns. It was also an older neighborhood in terms of age of population. North Pratt is a predominantly low-moderate income neighborhood. Census Tract #11 qualifies as a 58.5% LMI neighborhood. North Pratt includes a mix of single family and multi-family housing, along with commercial and institutional uses. It is immediately adjacent to the core of the historic Pratt City commercial core.

Accordingly, the RUDAT team focused much of its energy on the redevelopment of the historic Pratt core. It focused on the opportunity to re-build key community facilities (library and fire station) in a neighborhood friendly manner; it acknowledged the opportunity to create new development patterns for low-income elderly residents to live in proximity with these re-built services, but also to access transportation routes (Transit Oriented Development- TOD) that focus on Dugan Avenue/Avenue W. RUDAT also talked about the importance of linking these facilities to the populations they serve with plans for walk-ability.

As redevelopment began to pick up speed about 6 months after the storms, it became readily apparent that the Smithfield Estates was rapidly rebuilding while North Pratt was lagging. This was largely a result of the two neighborhoods' economic capacity and insurance. Smithfield Estates, being a comparatively wealthier neighborhood was significantly better insured and once insurance issues were worked through, rebuilding picked up rapidly. North Pratt was poorer, older, and significantly less well covered by insurance. Most North Pratt residents displaced by the storms remain displaced today, while others have made significant strides to re-build. These factors, along with the RUDAT Plan helped focus the City's efforts through our CDBG and related programs on assisting the recovery of North Pratt.

Citizen Participation

Since the April 27, 2011, tornado outbreak the City of Birmingham has worked diligently with various organizations and citizens who were directly and indirectly impacted by the natural disaster. These efforts include the very interactive RUDAT Planning effort. The City of Birmingham has worked hard to determine the greatest disaster recovery needs and how to address those needs. These interactions have been useful in the past and shall continue to be beneficial in the future. Through public comments and interactions with the citizens of the affected area, the City of Birmingham has determined the critical need for assistance to repair homes, public facilities, and infrastructures.

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Plan for Disaster Recovery

In response to the needs identified in the Needs Assessment (above), the City's Plan for Disaster Recovery focuses on the North Pratt Neighborhood.

- North Pratt is the poorest neighborhood in the Community which experienced 83% of the damages from the April 2011 disaster
- North Pratt is the neighborhood that received the most damage to housing and infrastructure in combination
- The RUDAT Plan identified the priority need for the City to re-build community facilities and to re-establish linkages between residents and facilities (including transit) in a walk-able community
- North Pratt's housing stock was heavily damaged and extremely underinsured. Most victims remain displaced to this day
- The lack of a permanent fire station in Pratt leaves the neighborhood in a situation where it must be covered by a temporary facility and adjacent facilities. Clearly, this is less than desirable for the residents of this low-moderate income community
- The reconstruction of infrastructure, public facilities and housing anticipated in this plan will 'prime the pump' and foster an environment that sets the table for future re-building

Homeless Prevention

In order to ensure that those individuals impacted by the storm do not become homeless the City of Birmingham will look to its HUD approved 2010-2015 Consolidated Plan and its current Action Plan to implement transitional housing for individuals who have been displaced by the storms or who will be displaced by activities to be undertaken in this Action Plan.

Housing and Services for Transition to Permanent Housing and Independent Living: the City plans to provide housing and services for transition to permanent housing and independent living to the homeless and the referenced homeless sub-populations. The City anticipates that it will also support applications for funding during the duration of this CDBG-Disaster Recovery Grant by other entities under programs for which it is not itself eligible to apply or for which it elects to have other entities apply. The City will particularly support those applications by other entities for programs to benefit the referenced homeless sub-populations. Many organizations that provide these services are funded by various Action Plan Programs (CDBG and ESG for example).

Assistance for Preventing Low-Income Individuals and Families with Children (especially those with incomes below 30 percent of median) from Becoming Homeless: The city plans to provide assistance to low and very low income homeowners and renters in order to rehabilitate structures classified as substandard. The program will provide affordable housing to low and very low income households who otherwise could be, or become homeless. The City of Birmingham anticipates that it will also support applications for funding during the duration of this CDBG-Disaster Recovery Grant by other entities under programs for which it is not itself eligible to apply or for which it elects to have other entities apply, to provide

affordable housing to prevent low-income households from becoming homeless. Many organizations that provide these services are funded by various Action Plan Programs (CDBG and ESG for example).

Assistance to address the special needs of persons who are not homeless identified in accordance with 24 CFR 91.215(e). The City plans to provide assistance to the City's special needs population by increasing the availability of housing for the disabled (mental, physical, and developmental) and by increasing the availability of housing for the low-income elderly and frail elderly, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents. Many organizations that provide these services are funded by various Action Plan Programs (CDBG and ESG for example).

Short-Term Recovery Planning

- Examine the City's response to the immediate needs of those temporarily or permanently displaced, or relocated from the disaster;
- Seek input from citizens and officials regarding the use and methods of redistributing CDBG disaster recovery grant funds; and
- Provide assistance to impacted residents to close gaps in funding from other sources.

Long-Term Recovery Planning

- Reconstruct a permanent Fire Station to replace Fire Station #18 which was totally destroyed by the storm. The facility was very old and did not meet modern firefighting needs. The replacement station will have 3 bays for fire fighting and emergency equipment and will have full facilities for firefighters and for community space. Some levels of insurance and FEMA assistance will be forthcoming to cover a portion of the costs---but not a significant portion. All insurance and FEMA proceeds will be first applied to the rebuilding and only then will proceeds from this grant be applied.
- The Public Library, unlike the fire station, was not totally destroyed by the storms. Primary repairs to the facility will be undertaken with insurance and other funds. The community and the library have long been desirous of improving the existing library to create outdoor garden and reading spaces. These enhancements, along with additional parking to serve the facility will be included as a phase 2 in this plan.
- The storms, along with 12 months of utility cuts, heavy equipment, fallen power poles, etc. have done significant damage to streets in the neighborhood. In addition, the RUDAT plan identifies Dugan Avenue in the vicinity of the fire station, new elderly housing and the library as a key link to establishing a walk-able community and Transit Oriented Development. Accordingly, the City will re-construct this segment of Dugan Avenue for these purposes.
- Provide Housing Rehabilitation—Although much rebuilding has begun, the community still struggles with the need for long-term recovery of housing. The City will use funds from this program to be the catalyst to stimulate re-building of damaged houses
- Provide New Housing—Despite all efforts, some residents have made the decision to leave Pratt forever. In order to have a cohesive community and to limit gap-toothed development patterns, grant funds will be used to assist with the construction of new replacement housing in devastated areas.

- Provide for the long-term stability of affected neighborhoods through efforts to repair public facilities and streets;
- Participate in regional planning efforts to address recovery and continue to work with other jurisdictions on current initiatives; and
- Partner with local organizations to ensure that all impacted residents receive the assistance available to them.

Leveraging Other Funds

The CDBG-DR allocation of \$6,386,326 will be leveraged against numerous other sources of federal, state, local and private funding which currently total \$8,088,536. In compliance with program guidelines and regulations, CDBG-DR funding has been allocated toward recovery efforts in the most impacted and distressed areas of the City of Birmingham to support unmet needs not funded by proceeds from the Federal Emergency Management Agency (FEMA), the Small Business Administration (SBA), private insurance or other sources of public and private funding.

Supplemental sources of funding allocated toward recovery efforts primarily consist of federal funds, including annual entitlement grants (HOME & CDBG) and other time-limited allocations (NSP-3). Other sources include proceeds from FEMA, SBA, private insurance payouts, and state assistance. A summary of other leveraged funding and their designated uses is included in the following table.

The allocation of these combined funds will result in a more comprehensive and effective recovery effort by: 1) ensuring that a wide and diverse range of recovery needs are met; 2) assuring flexibility to address short-term and long-term recovery needs; 3) enabling communities to meet needs that would not likely be addressed by other funding sources; and 4) developing communities which are better positioned to meet the needs of their post-disaster populations and prospects for growth.

Designated Use	Other Funding	Source of Other Funding	Funding Type
<i>Development of Multi-Family Housing for Seniors in Pratt City</i> (up to 42 units)	\$2,700,000	Community Development Block Grant (CDBG)	Federal
<i>Development of Multi-Family Housing for Seniors in Pratt City</i> (up to 42 units)	\$2,520,000	Home	Federal
<i>Reconstruction of Single-Family Housing in Pratt City</i> (up to 25 units)	\$2,318,536	Neighborhood Stabilization Program (NSP-3)	Federal
<i>Housing Repair Program</i> – Supplemental grants up to \$15,000 for repairs above & beyond the value of Insurance Proceeds and FEMA Assistance	\$350,000	CDBG-R	Federal
<i>Housing Reconstruction Program</i> – Zero percent interest loans up to \$40,000 for	\$200,000	CDBG	Federal
	\$8,088,536.00		

Table 1.0 Leveraging Funds

Promoting the Mitigation of Flood Risk

Under this Action Plan, the City of Birmingham does not find it necessary to focus funding on providing funds for housing units to implement elevation. The impacted area is not in a flood plain and there were no cases of flooding reported.

Promoting High-Quality, Durable, Energy Efficient, and Mold Resistant Construction Methods

The Housing Division within the Department of Community Development will ensure that all residential construction activities meet the 2000 International Residential Code Chapter 11. Commercial and multifamily rental activities will be sure to meet the International Building Code of 2003 or the City's municipal code; the most stringent code will be followed. The 2000 International Energy Conservation Code (IECC) which works to provide more energy efficient structures.

Projected Use of Funding

Please note that The City of Birmingham has elected not to administer any funding for planning costs, although, 15% is available as outlined in the *Federal Register* notice.

The following projects are being proposed for the City of Birmingham's allocation of CDBG-Disaster Recovery Grant, 2012. Factors considered in selecting the activities represent the City's desire to respond to the urgent and immediate need to respond to critical infrastructure problems facing the worst damaged area of the city and homeowners needing assistance with the rehabilitation of privately-owned properties.

Activity	National Objective to be Addressed	Available Funding for Activity	% of Total Funding
Administration Funds	Not Applicable	\$ 319,316.30	5.00%
Rehabilitation of Substandard Housing	LMI_Direct Benefit	\$ 500,000.00	7.83%
New Construction Within the Affected Area	Urgent Need	\$ 1,367,009.70	21.40%
Reconstruction of Public Library	LMI/Area Benefit	\$ 450,000.00	7.05%
Reconstruction of Fire Station	LMI/Area Benefit	\$ 2,550,000.00	39.93%
Street Improvements	LMI/Area Benefit	\$ 1,200,000.00	18.79%
Total Plan Funding		\$ 6,386,326.00	

Table 2.0 Projected Use of Funds

Activity 1 – Administration of Grant: The City of Birmingham proposes to use the entire 5% allocation available for administrative costs.

Threshold Criteria: Funds will only be used to cover the cost of administering the CDBG-Disaster Recovery Grant.

Grant Size Limits: As presented in the *Federal Register* notice dated April 16, 2012, The City of Birmingham is allowed to use up to five percent (5%) of the grant for administrative costs; therefore, the costs for administrative services is not to exceed \$319,316.30.

Activity 2 – Rehabilitation of Substandard Housing: The City of Birmingham proposes to use no more than \$500,000.00 to assist residents in the Pratt City area of Birmingham, Alabama who were impacted by the presidentially declared natural disaster. Approximately 2,236 homes were damaged in the Pratt City neighborhood. Although much re-building has begun, the community still struggles with the need for long-term recovery of housing. The City will use funds from this program to be the catalyst to stimulate re-building of damaged houses.

Threshold Criteria:

- Funds will be used only for the costs of rehabilitation not covered by other federal, state, or local assistance or insurance claims.
- Only applications received in the Department of Community Development from eligible applicants, as outlined in the department’s qualification guidelines, will be considered for assistance.
- Applicant must have an identified need that has not been met through FEMA, SBA, insurance, or private donation.
- Applicant must provide proof that there is an apparent need not being met by other sources.

Grant Size Limits: The total allocation proposed for the provision of financial assistance with repairs/rehabilitation of residential property is \$500,000.00.

Geographic Area: Pratt City (See attached map)

Activity 3 – New Construction within the Affected Area: Approximately 359 residential dwellings were destroyed in the Pratt City neighborhood as a result of the April 27, 2011 natural disaster. The demolition of those homes has resulted in an accumulation of vacant lots. The City of Birmingham proposes to use nearly \$1.5 million for the purpose of acquisition and new construction within the Pratt City neighborhood. Despite all efforts, some residents have made the decision to leave Pratt City forever. In order to have a cohesive community and to limit gaps, grant funds will be used to assist with the construction of new replacement housing in devastated area.

Threshold Criteria: Funds will be awarded to contractors for the sole purpose of constructing single family homes throughout the Pratt City neighborhood.

Grant Size Limits: The proposed allocation for the provision of new construction is \$1,367,009.70.

Geographic Area: Pratt City (See attached map)

Activity 4 – Reconstruction of Public Library: The City of Birmingham proposes to provide an outdoor expansion to the Pratt City Public Library. This expansion will allow for additional parking, a garden, and outdoor seating. Primary repairs to the facility will be undertaken with insurance and other funds. The community and the library have long been desirous of improving the existing library to create outdoor garden and reading spaces. These enhancements, along with additional parking to serve the facility will be included as a Phase 2 in this plan.

Threshold Criteria:

- Funds will be used only for outdoor development
- Funds will not be used for acquisition of property
- Funds will be used as a Phase 2 of the library’s reconstruction

Grant Size Limits: The total allocation proposed for the provision of Reconstruction of Public Library is \$450,000.00.

Geographic Area: Hibernian Street (See attached map)

Activity 5 – Reconstruction of Fire Station #18: The City of Birmingham proposes to use \$2.5 million toward the reconstruction of Fire Station #18. The station was heavily damaged by the April 27th tornado which exasperated and intensified the station’s preceding flaws. This fire station was built in 1961, and it is not ADA compliant. The City intends to expand the fire station in order to allow for space for a much needed rescue unit. The implementation of a rescue unit will positively impact the life support response time in the Pratt City neighborhood. Additionally, the City intends to provide sleeping quarters that will allow for a co-ed work force. In the past, females were unable to be assigned to this station because of the very small sleeping quarters. Currently, the lack of a permanent fire station in Pratt leaves the neighborhood in a situation where it must be covered by a temporary facility and adjacent facilities; this is less than ideal for the residents of this low-moderate income community.

Threshold Criteria: The Fire Station will be receiving funds from FEMA and an insurance claim. The City of Birmingham intends to monitor funding received from outside sources to prevent duplicative benefits. The City proposes to provide the Fire Station with the additional funds need to reconstruct the facility. All insurance and FEMA proceeds will be first applied to the rebuilding and only then will proceeds from this grant be applied. In light of the age and obsolescence of the fire station, FEMA and insurance proceeds will be minimal.

Grant Size Limits: The total allocation proposed for the provision of Fire Station #18 Reconstruction is \$2,550,000.00.

Geographic Area: Dugan Avenue (See attached map)

Activity 6 – Street Improvements: The City of Birmingham proposes to use \$1.2 million for street improvements. The storms, along with 12 months of utility cuts, heavy equipment, and fallen power poles have done significant damage to streets in the neighborhood. In addition, the RUDAT plan identifies Dugan Avenue in the vicinity of the fire station, new elderly housing and

the library as a key link to establishing a walk-able community and Transit oriented Development. Accordingly, the City will re-construct this segment of Dugan Avenue for these purposes.

Threshold criteria: Streets must be located within the presidentially declared natural disaster area and the streets must have received damage as a result of the natural disaster.

Grant Size Limits: The total allocation proposed for the provision of Street Improvements is \$1,200,000.00.

Geographic Area: Pratt City (See attached map)

Preventing Fraud, Abuse of Funds, and Duplication of Benefits

In order to ensure the proper disbursement of grant funds The City of Birmingham plans to remain in compliance with applicable CDBG rules and regulations, as well as other applicable federal regulations such as OMB Circulars A-87, A-133, and 24 CFR Part 85 (Uniform Administrative Requirements). The City of Birmingham will particularly emphasize mitigation of fraud, abuse and mismanagement related to accounting, procurement, and accountability which may also be investigated. Birmingham will monitor the compliance of applicants, and HUD will monitor the Department of Community Development's compliance.

Monitoring Standards and Procedures

The City of Birmingham through its Department of Community Development is committed to a comprehensive program of monitoring and evaluating the process of disaster recovery activities. The goal is to ensure long-term compliance with the applicable regulations and standards such as OMB Circulars A-122, and particularly those requirements of the CDBG Disaster Recovery Program. The City of Birmingham's procedures will ensure that there is no duplication of benefits that have otherwise been covered by FEMA, private insurance, any other federal assistance, or any other funding source whether it is local or state funding. Only expenditures that are eligible CDBG activities, address disaster-related needs directly related to the approved natural disaster, and meet at least one of the national CDBG objectives will be funded. If a contract has been funded but is determined to not meet the previously listed criteria, the contract awardees shall be required to refund the amount of the grant that was awarded to said awardee. The City of Birmingham reserves the right to take appropriate action in instances of non-compliance, fraud, and mismanagement including, but not limited to, disallowing ineligible costs, terminating contracts/agreements, and requiring repayment of funds.

Quality Assurance

The City of Birmingham will continuously monitor awardees which will provide quality assurance. The city will determine the areas to be monitored, the number of monitoring visits, and their frequency. Any entity administering CDBG Disaster Recovery funding will be monitored not less than once during the contract period. The monitoring will address program compliance with contract provisions, including national objectives, financial management, and the requirements of 24 CFR Part 58.

Investigation

The City of Birmingham reserves the right to launch an investigation through a third party if the administrative head of the Department of Community Development has reasonable cause to believe that money received through the CDBG Disaster Recovery Grant has been lost, misappropriated, or misused, or that other fraudulent or unlawful conduct has occurred in relation to the operation of the contract awardee.

Independent Internal Audit

The City of Birmingham and contract awardee are subject to the Single Audit Act. A “Single Audit” encompasses the review of compliance with program requirements and the proper expenditure of funds by an independent Certified Public Accountant.

Increasing Capacity of Implementation and Compliance

The City of Birmingham’s Community Development Department staff will be provided with all training necessary to ensure that activities funded under this Action Plan are correctly administered. As contracts are made, necessary efforts to increase the capacity of applicants, subrecipients, contractors, and any other entity responsible for administering funding under this Action Plan will be implemented to ensure they have the specific skills needed to successfully oversee the activity.

Contract Administration

Amendments

If any of the following events occur a substantial amendment will result;

- The addition or deletion of any allowable activity described in the Action Plan;
- A change in the planned, allowable beneficiaries;
- A change of more than five percent in the funding allocation between the activity categories described;
- The implementation of an additional HUD-authorized “waiver” of any major programmatic rules or regulations; and
- Any action that HUD deems to be a significant amendment that needs public input prior to enacting

Certifications Required

The use of the disaster recovery funding is contingent upon specific requirements. The City of Birmingham along with contract awardees will be expected to certify that these requirements will be met or carried out. Contract awardees will be required to certify in writing that the grant will be carried out in accordance with applicable federal and state laws, rules and regulations. Each contract awardee must certify that they will minimize displacement of persons or entities and assist any persons or entities displaced in accordance with the Uniform Anti-Displacement and Relocation Act and local policy.

Program Income

Any program income earned as a result of CDBG-DR grant funds will be subject to the rules outlined in the waiver published in Federal Register notice FR-5628-N-01. In order to provide for more flexibility program income rules at 570.500(a) and (b), 570.504, 42 USC 5304(j), and 570.489(e) have been waived. Program income received (and retained, if applicable) before or after closeout of the Disaster Recovery grant, and used to continue disaster recovery activities, is treated as additional disaster recovery CDBG funds subject to the requirements of said Notice and must be used in accordance with this Action Plan for Disaster Recovery. To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Treasury are made, with one exception. In addition, The City of Birmingham may transfer program income before closeout of the Disaster Recovery grant into to its annual CDBG program.

Citizen Complaints

The City of Birmingham acknowledges that it will provide a written response to any citizen complaint received. The response will be provided within 15 working days of the Department of Community Development receiving it.

Documentation and Reporting

As required by HUD and outlined in the Federal Register notice, the City of Birmingham will enter its Action Plan for Disaster Recovery, including performance measures, into HUD's DRGR system. As more detailed information about uses of funds is identified by the City, it will enter such detail into DRGR, insufficient detail to serve as the basis for acceptable performance reports.

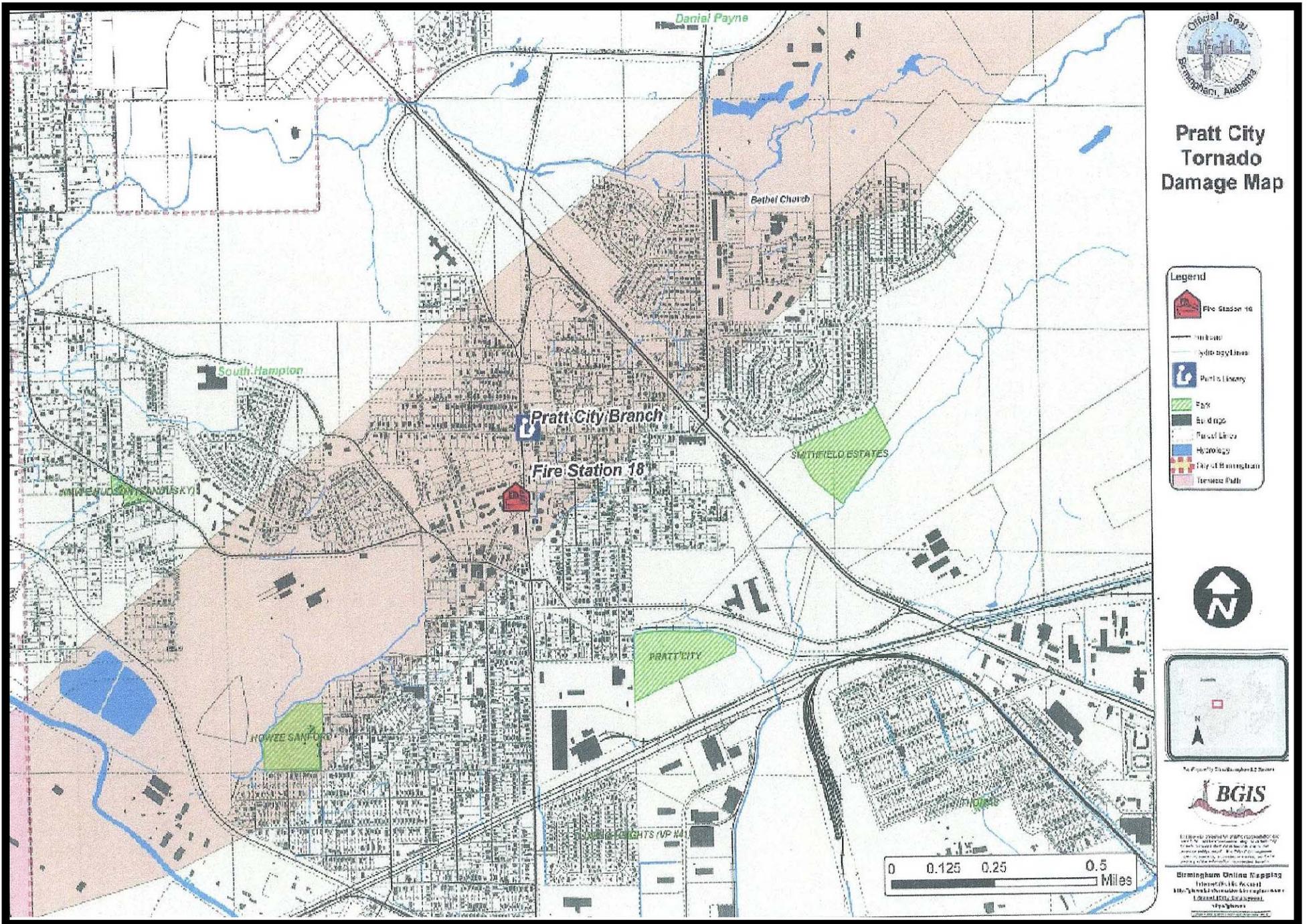
A quarterly performance report will be submitted to HUD no later than 30 days following the end of each calendar quarter, beginning after the first full calendar quarter after grant award and continuing until all funds have been expended and all expenditures have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total amount of any non-CDBG disaster recovery funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes such as number of housing units complete or number of low-and moderate-income persons benefiting; and the race and ethnic status of persons assisted under direct-benefit activities. Quarterly reports to HUD will be submitted using the DRGR system and within 3 days the City of Birmingham will post the submitted report to its official website.

Timeframe for Completion

The City is proceeding with design of infrastructure elements in order to expedite construction of improvements in a timely manner. We will seek to have these design costs reimbursed. We estimate that all improvements and activities described and funded by these funds will be completed within 30 months of the signature of grant agreements.

<u>Project to be Completed</u>	<u>Anticipated Length of Activity</u>	<u>Projected Date of Completion</u>
Rehabilitation of Substandard Housing	30 months	January 31, 2015
New Construction	30 months	January 31, 2015
Reconstruction of Public Library	30 months	January 31, 2015
Reconstruction of Fire Station	30 months	January 31, 2015
Street Improvements	30 months	January 31, 2015

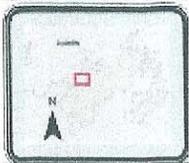
Table 3.0 Timeframe for Completion



Pratt City Tornado Damage Map

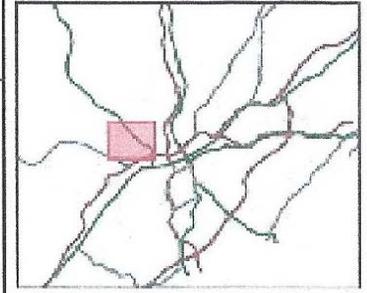
Legend

- Fire Station 18
- Utility Lines
- Pratt City Branch
- Park
- Building
- Transit Line
- Highway
- City of Birmingham
- Transit Path



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Birmingham Online Mapping
 1000 14th Street, Suite 100
 Birmingham, Alabama 35203
 205.933.1111
 www.birminghamonline.com



Legend

Roads

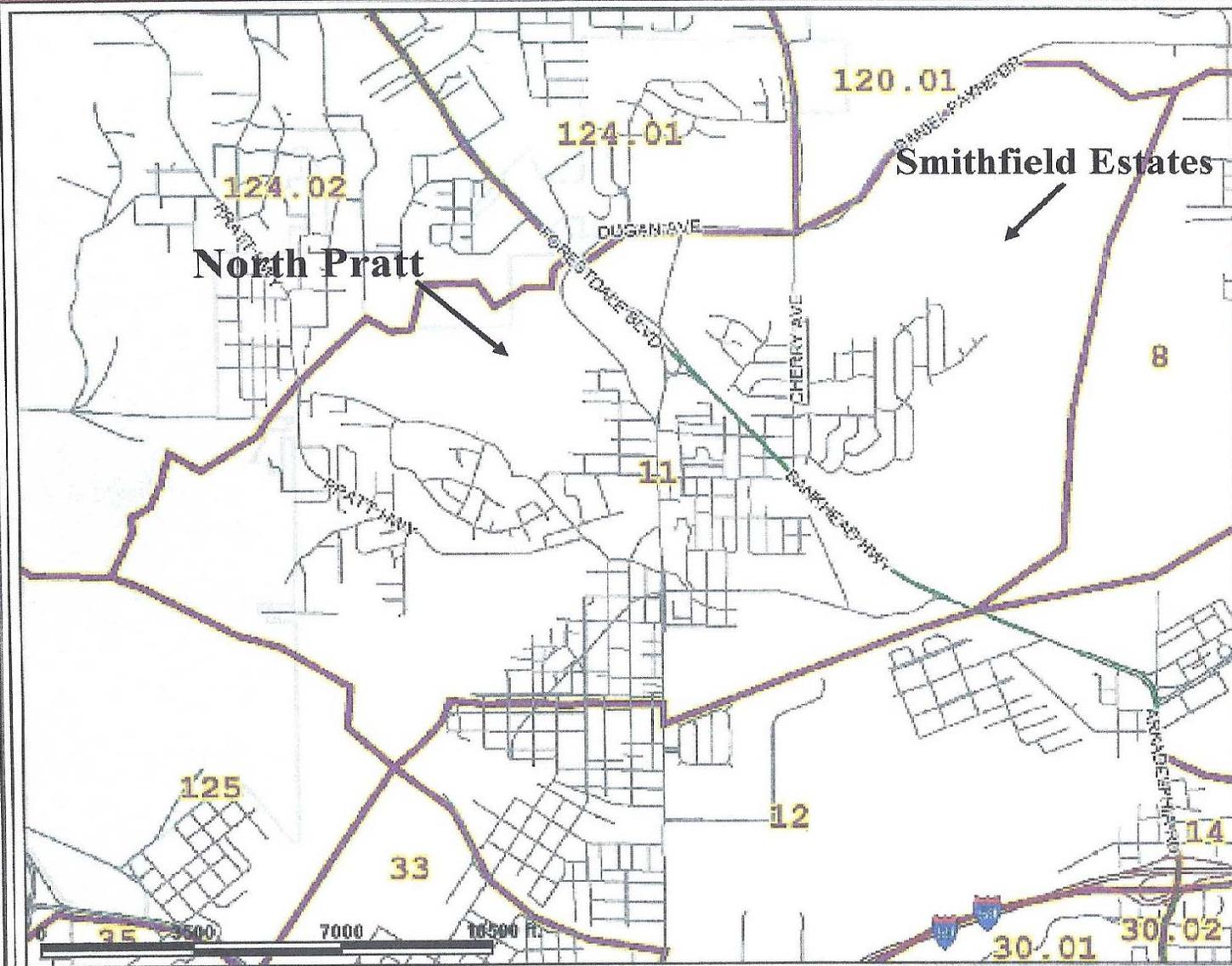
- Limited Access
- Ramp
- US Highway
- State Highway
- County Highway
- Arterial
- Local

Census Tracts

City Limits

Census Tract 11
58.5% LMI

Scale: 1:44,154

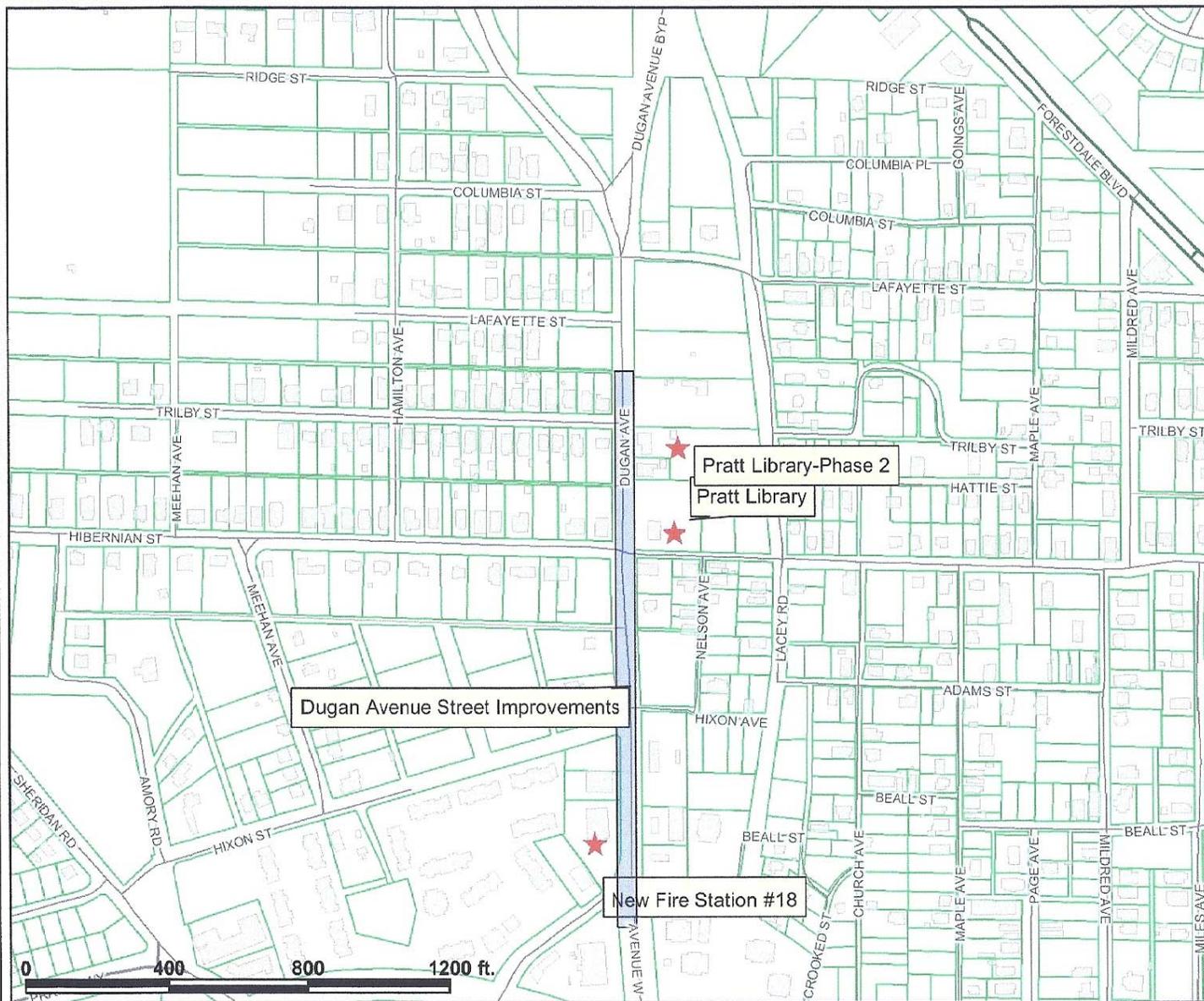
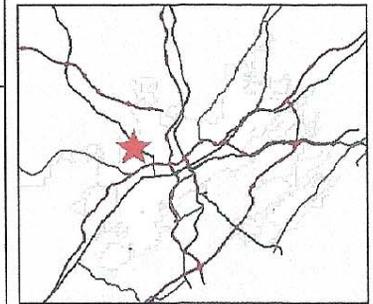


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<http://gisweb.birmingham.com> Map Created: February 1, 2012



Disaster Recovery Action Plan Projects



Legend

- Buildings
- Parcels
- City Limits

Scale: 1:5,313

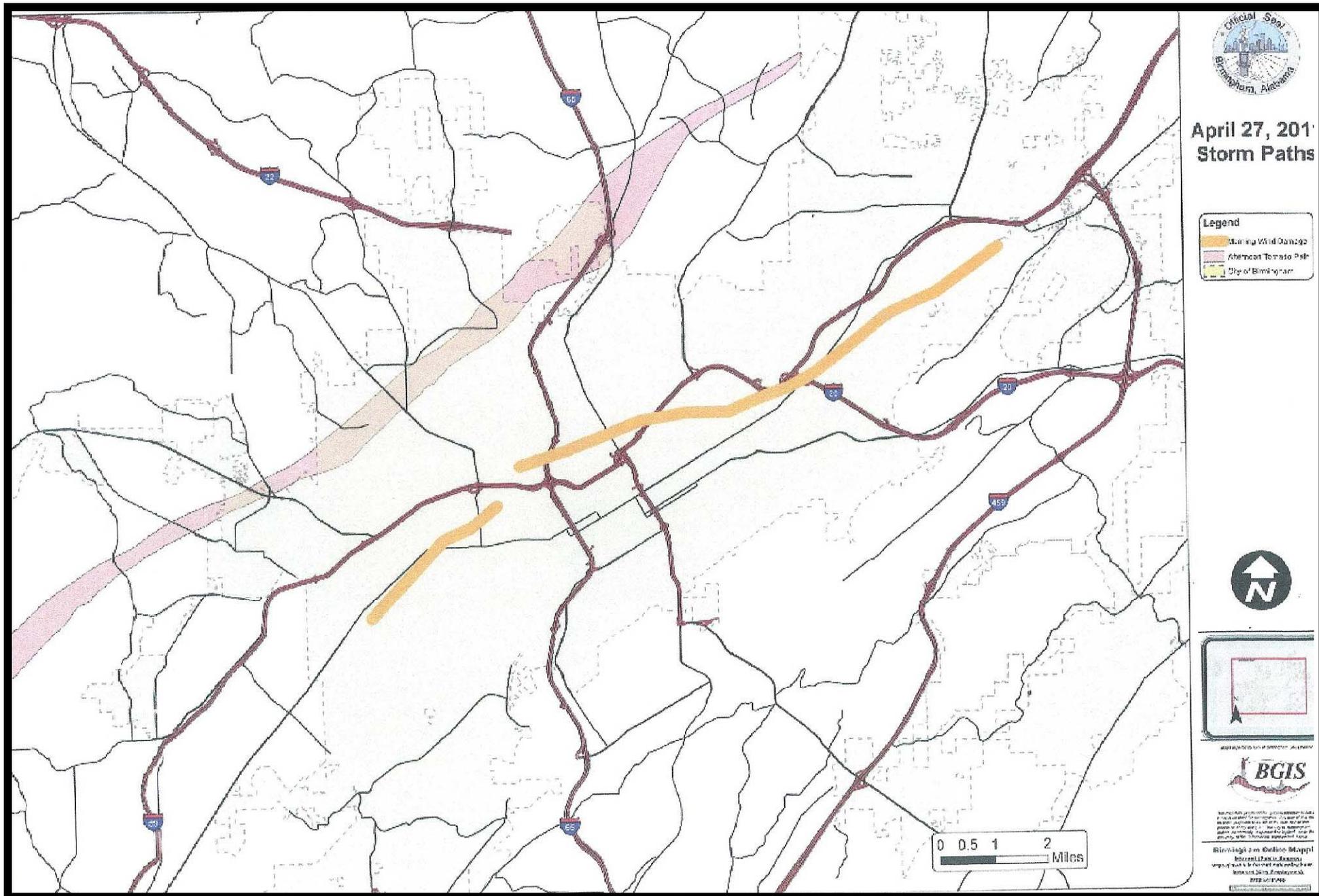
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<http://gisweb.informationbirmingham.com>

Map Notes: City of Birmingham

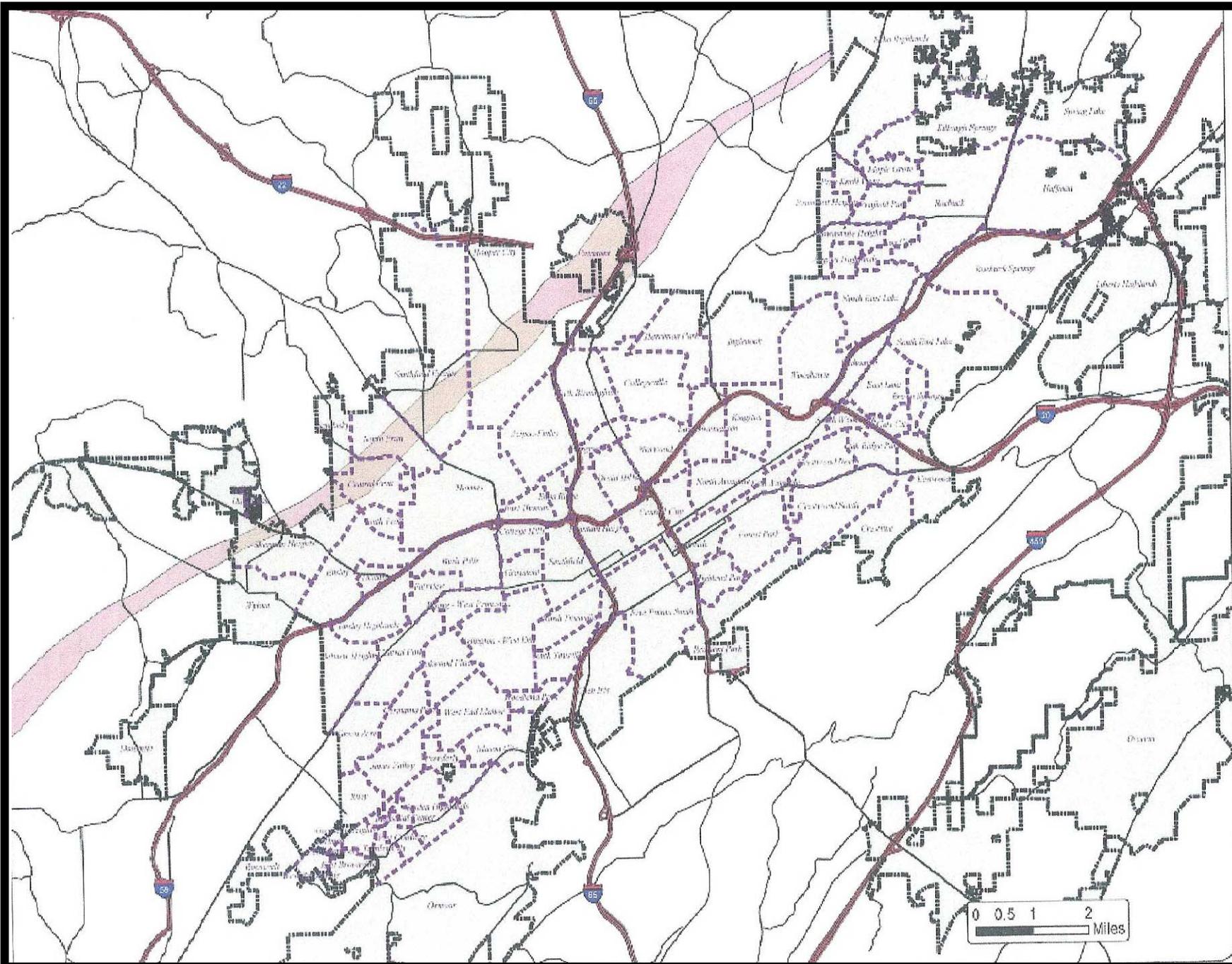
Map Created: May 21, 2012





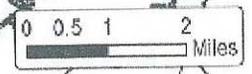
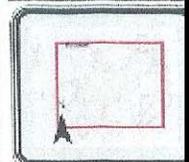


April 27, 2011 Storm Path



Legend

- Original Boundaries
- Highway Boundary
- Area of Impact Path
- City of Birmingham



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