



Development
Services Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor

Lydia L. Mihalik, Director

Office of Community Development CDBG-DR Disaster Recovery Plan Montgomery County



77 South High Street
Columbus, Ohio 43215 U.S.A.

614 | 466 3379
800 | 848 1300
www.development.ohio.gov

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Executive Summary

Beginning Memorial Day evening, May 27, 2019, and into Tuesday, May 28, 2019, 21 EF-0 to EF-4 tornadoes struck Ohio, with nearly two-thirds of the touchdowns occurring in three adjacent counties in the Dayton region. The devastation in the Miami Valley was immense, and disproportionately impacted already economically distressed urban and densely populated areas. The storms damaged nearly 6,000 homes, of which nearly 1,200 incurred major damage or were destroyed. Additionally, the storms devastated some of the region's most vulnerable populations, cutting a path that disproportionately impacted high-poverty neighborhoods where many residents were underinsured or uninsured. The tornadoes dramatically impacted the business community, damaging nearly 400 commercial and industrial businesses. Two of the three counties that received both Public Assistance (PA) and Individual Assistance (IA) in the Presidential Disaster Declaration as a result of the tornadoes were in the Miami Valley Region. Prior to these tornadoes, Ohio's last declared emergency was more than 12 years ago.



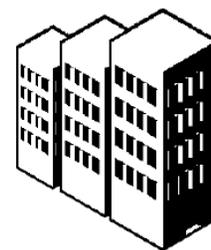
19
Tornadoes



Nearly 6,000
homes damaged



Nearly 1,200 homes
with major damage or
destroyed



Nearly 400
businesses damaged

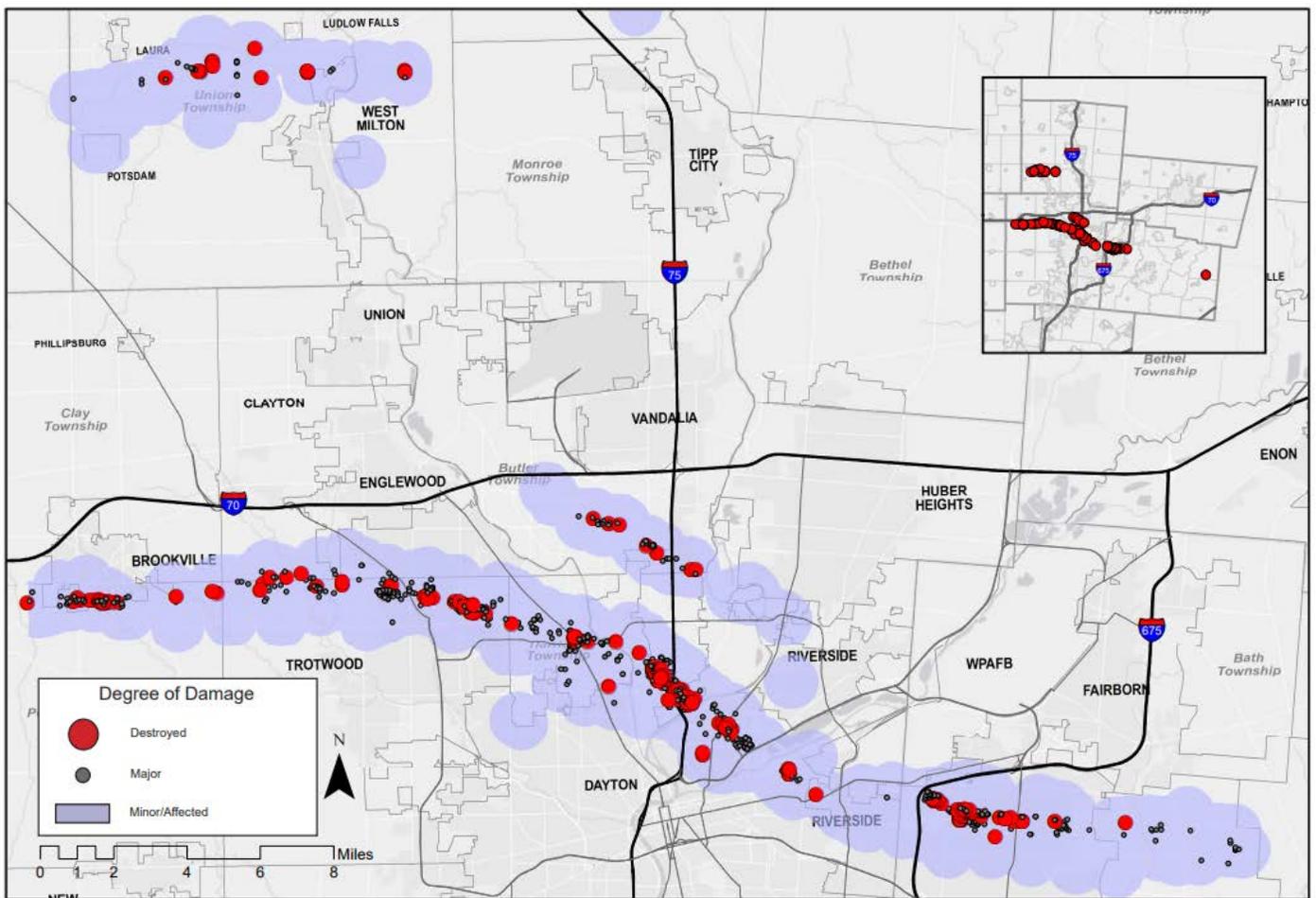
Overall, the tornadoes' strength ranged from EF0 to EF4. Greene, Miami, and Montgomery counties experienced severe damage. The National Weather Service (NWS) initially declared the tornado that touched down outside Dayton as an EF3, but later determined it to be an EF4 after survey teams assessed the damage. Maximum winds were estimated at 170 miles per hour destroying buildings, utilities, and trees. According to the NWS, the tornado moved west across Montgomery County starting outside of Brookville and ending in Riverside. It was the first violent EF4+ tornado in Montgomery County since 1950.

Unfortunately, dozens of people were injured and one killed. On May 29, 2019, the National Weather Service issued 36 tornado warnings and one flash flood warning. People in Dayton reported hail the size of golf balls. The storms caused gas leaks, fires, power outages, and water supply shutdowns. Additional information will be provided below regarding indirect damages and secondary effects, damage estimates, demographic changes, immediate response, and community feedback.

On June 11, 2019, Governor Mike DeWine requested a major disaster declaration due to the severe storms, straight-line winds, tornadoes, flooding, and landslides from May 27, 2019 to May 29, 2019. On June 18, 2019, President Trump declared a major disaster existed in Ohio. The U.S. Department of Housing and Urban Development (HUD) allocated \$12,305,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the state. At least \$9,844,000, no less than 80%, must be expended for recovery in the HUD-identified most impacted and distressed area - ZIP Code 45426, the

City of Trotwood, in Montgomery County. However, HUD will allow the most impacted area to be categorized and utilized countywide. Due to the extreme damage the storms inflicted on housing, Ohio will utilize the CDBG-DR funds to construct new or rehabilitate multifamily housing and provide some housing rehabilitation and repairs for homeowners in Montgomery County.

Exhibit 1-0 Miami Valley Regional Memorial Day 2019 Tornado Damage Assessment

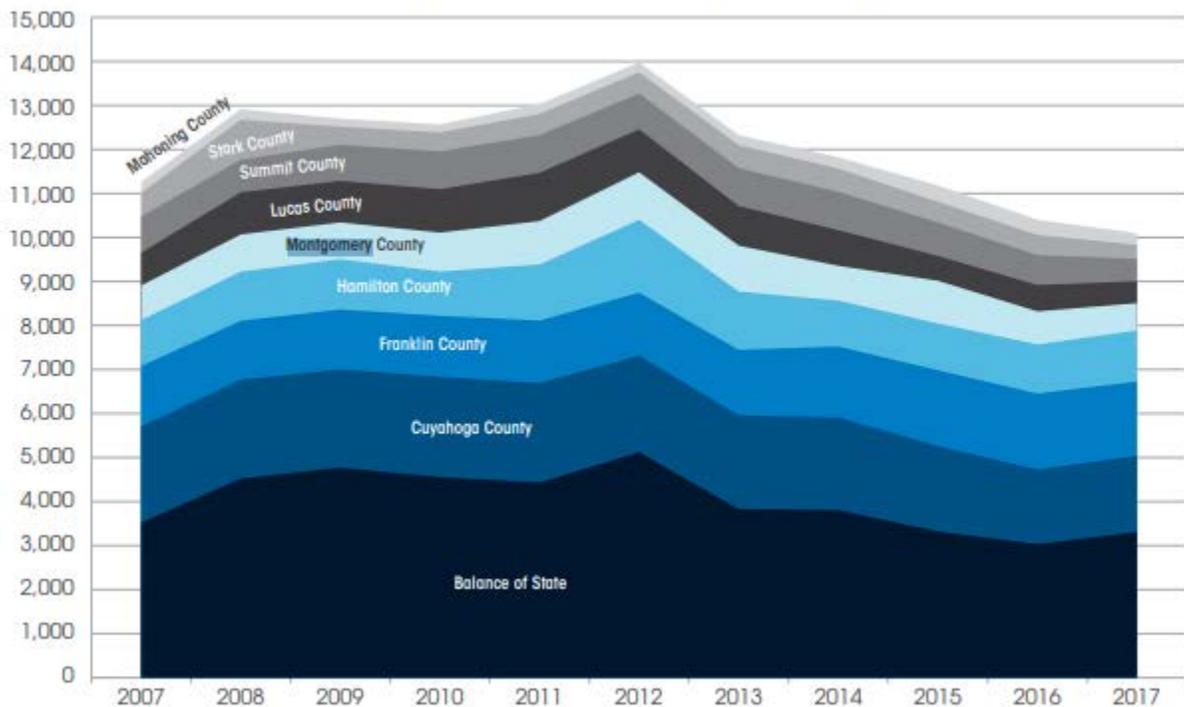


Montgomery County ranks 20 in the state for school districts where renter-occupied households are experiencing severe housing cost burden.

Two Montgomery County school districts hit hard in the tornados already ranked in the state’s top 20 school districts of students experiencing homelessness. Dayton City ranks 11 with 254, 1.9% of student enrollment experiencing homelessness, and Trotwood-Madison City is 18 with 175 students, 6.8% of student enrollment experiencing homelessness. (OHFA, 2019)

The exhibit below shows the point-in-time count of the homeless population over a 10-year period. Montgomery County ranked fifth highest in Ohio.

Exhibit 1-4 Point-in-Time Count of Homeless Population by Continuum of Care



Infant Mortality Hot Spot

Ohio’s children face poverty and health challenges related to their housing environment. If the mother lives in low-quality and has inconsistent housing, it can contribute to infant mortality (OHFA, 2019). Ohio is eighth in the country for a high infant mortality rate. Furthermore, there is a stark racial gap in infant mortality. Montgomery County’s infant mortality rate was 6.8 deaths for every 1,000 births overall in 2018, though the rate was 10.5 deaths per 1,000 births for black infants. In 2016, for every 1,000 children born, 7.4 died before their first birthday with black infants experiencing 15.2 deaths per 1,000 live births.

Education & Employment

In Montgomery County only 36.9% of residents ages of 25 and older received an associate degree or higher, 63.1% have no degree, and 10.1% do not have a high school diploma. Montgomery County does

not have four-year public universities or regional campuses. The county has one two-year public college, one technical center, and two private universities.

The Dayton region tends to lag behind national trends so the unemployment rate is higher, closer to 4.5%. But that's a sharp decrease from five years ago when the unemployment rate in the Dayton Metropolitan Statistical Area (MSA), defined as Montgomery, Greene and Miami Counties, was at 5.87%. Prior to COVID-19, the Dayton Research Advisory Council was confident unemployment in the area would remain low. Steady but slow job growth was predicted for Dayton with 2,200 jobs to be added by the end of 2020. According to the ManpowerGroup Employment Outlook Survey, 26% of employers in the Dayton MSA plan to hire more employees in the first quarter of 2020. ManpowerGroup also reports a majority of businesses surveyed, 67%, will maintain current staff levels. (Research Advisory Council, 2020).

Dayton is Ohio Aerospace Hub and has the largest single-site employer in Ohio, Wright-Patterson Air Force Base. With 30,000 employees, Wright-Patt is the largest employer in Dayton. Healthcare remains the second fastest growing industry for the Dayton Metropolitan Statistical Area (MSA) just behind government jobs at Wright-Patterson Air Force Base. 29 hospitals and health organizations in the greater Dayton region have an \$8.1 billion economic impact and employ nearly 35,000 people – well above the national average. Manufacturing, transportation/warehousing and logistics remain strong industries within the region but the RAC notes employment is still below pre-recession levels. (Research Advisory Council, 2020)

According to a report conducted by the U.S. Conference of Mayors (of which Dayton Mayor Nan Whaley is a member) at the peak of the 2007 recession, the Dayton region lost more than 34,000 jobs and the report predicts it will be 2024 before all of those jobs return. The auto industry remained a little soft in 2019 but the RAC predicts it will stabilize in the second quarter of 2020. From 2014 to 2019, manufacturing jobs grew by more than 4,000 in the Dayton MSA. Transportation and warehousing grew by 6% within the same time period. The RAC said the overall softening is a national trend but those industries are more volatile here in Dayton, partially because wages lag slightly behind the national average. According to the most recent wage estimates by the U.S. Bureau of Labor Statistics, median hourly earnings for all production occupations in the nation are at \$16.86. In the Dayton MSA, those same occupations earn a median hourly wage of \$16.54. (Research Advisory Council, 2020)

The county's civilian labor force is more than 250,700. Of that total 239,400 are employed.

Economic Conditions

For more than a decade, the Dayton region has struggled to remain economically viable. It was hit hardest when automotive-related manufacturing sites closed during the 2007 recession. Several of the region's largest employers also left Ohio. More than a decade later the job market is growing, despite the labor shortage, but the job growth and unemployment rate are higher than the national average. The supply chain and healthcare economies are growing industries; however, the county needs to implement workforce development initiatives to support them.

The economy overall experienced budget cuts from intergovernmental revenues but currently has no deficits. Revenues increase by 5.1%, property values increased by 4.6%, and sales tax increased from .25% to 1.25%, the first increase in 30 years. Dayton's MSA specifically experienced a major decrease in jobs within the nonagricultural sectors, but an increase in the health, trade, transportation, and utility, and federal sectors.

Plans & Needs

The county plans to diversify its economic base and leverage its technology, research, and development sectors at the Wright Patterson AFB. The county is also actively working to implement a long-term financial plan encompassing planning processes and allocation methodology, capital issues, financial projections, and general economic trends. Montgomery County wants to improve overall services for families and children. Therefore, the plan will include managing the Human Service Levy Funds. The county also wants to address changes and needs for food security, environmental development, and disability services and regulations. To achieve these goals the county prioritized these initiatives in its financial plan and has prepared to manage finances accordingly for efficient investment in community and economic development. (Keith, 2018)

Post-Disaster Conditions

On Memorial Day, May 27, 2019, and the early morning hours May 28, 2019, was an historic 24-hour period in Ohio. Starting at sunset on May 27, 20 separate tornadoes hit the Dayton area, the most ever recorded in a 24-hour period in Ohio. Four tornadoes registered as EF3 or higher: one was an EF4 and three were rated EF3 This was the largest tornado event in Ohio history.

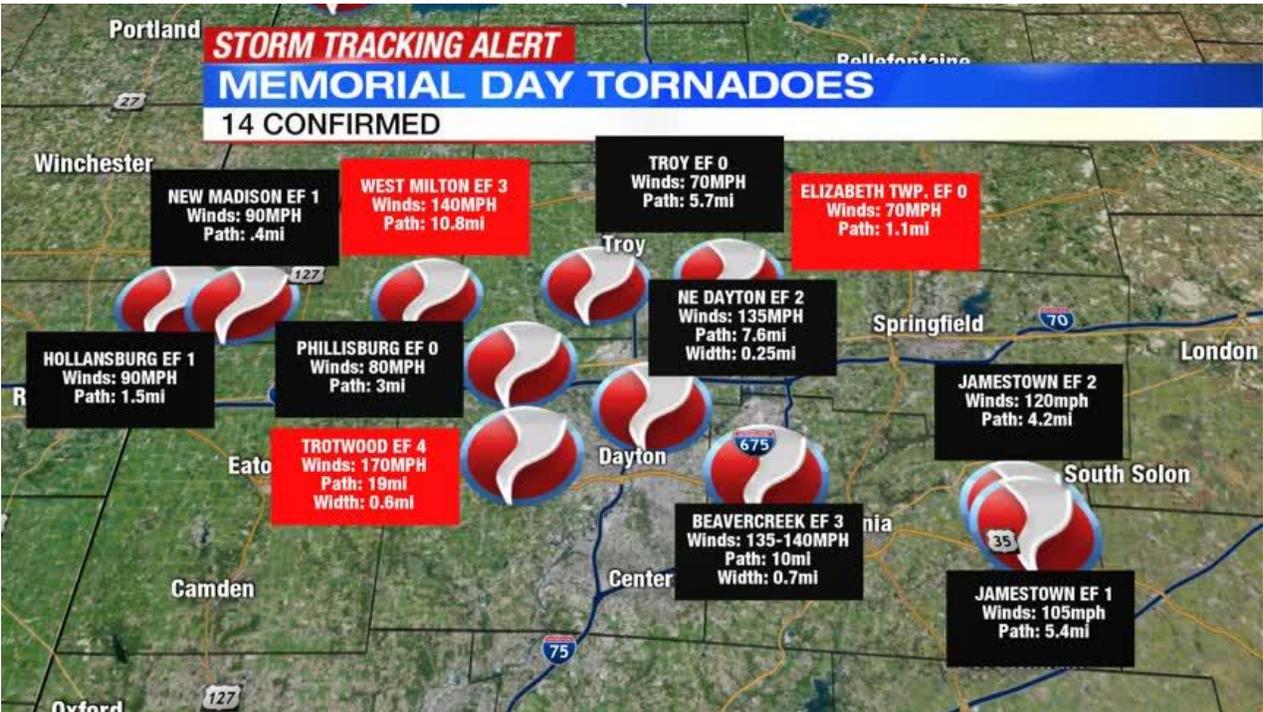


Exhibit 1-5 Shows an early report from Dayton local new ABC9.

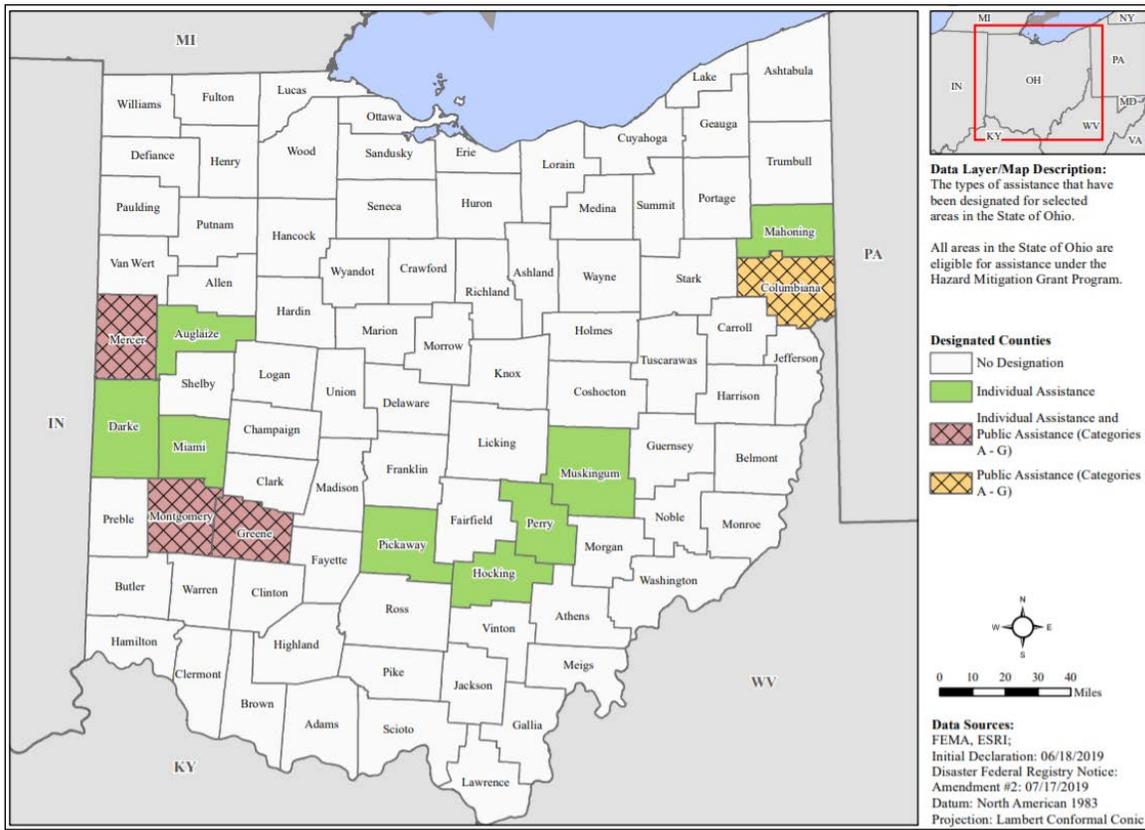


Exhibit 1-6 Ohio –Severe Storms, Straight-line Winds, Tornadoes, Flooding, and Landslides FEMA-4447-DR Declared on June 18, 2019, President Trump declared that a major disaster exists in the State of Ohio. This declaration made Individual Assistance requested by Governor DeWine available to affected individuals and households in Auglaize, Darke, Greene, Hocking, Mercer, Miami, Montgomery, Muskingum, Perry, and Pickaway counties.

Business and Economic Impact

The disaster disproportionately impacted already economically distressed areas. Based on current American Community Survey (ACS) data Dayton, Harrison Township and Trotwood each have a poverty rate greater than 20%. Harrison Township’s and Trotwood’s unemployment rate averaging more than 9% over the past three years.

Employment and Labor Statistics

The business sector was significantly impacted by the tornadoes. Information from the county’s community and economic development department indicated that 12 business sustained more than \$9.2 million in damage, production loss and lost wages. As a result, 266 workers were displaced. One company paid hotel costs for 25 of its employees whose homes were damaged. All of the company’s employees, 50 total, were displaced because of lost production.

Businesses in Old North Dayton employ more than 10,000 people. Two businesses, Dayton-Phoenix Group and Lion Apparel, are currently closed due to damage from the tornadoes. The Dayton-Phoenix Group, based in Dayton, was founded in 1939 and employed 250 people. They design and manufacture electrical and locomotive components for industrial and railroad markets worldwide. They also design and manufacture 3- and 4-cylinder motor-driven pistons compressor motors and NEMA-type motors for screw-compressor applications.

Lion Apparel manufactures turn-out gear for first responders and employs 40 people. They held the grand opening for a new production facility (\$1.7 million) on May 22, 2019. The tornado destroyed their building. The damage also included one production line being destroyed, resulting in an inventory loss and product manufacturing halted. The estimated economic impact on the business is \$3.5 million. The company met sales needs by shifting work to another facility, but the company constructed the new facility to accommodate increased sales.

The impact on Harrison Township's, Trotwood's, and Vandalia's economies was significant. However, the county has been diligent in its efforts to be resilient and return stability to the region. Business First! For a Greater Dayton Region visited 418 businesses to examine the storms' impact and gather information on what companies needed to continue operating. The group organized Disaster Recovery Business Walks in Trotwood, Harrison Township, and Vandalia to assist companies with finding resources and aid and obtain estimates for repairs and revitalization.

According to the Disaster Recovery Walk Summary Data, Business First targeted 585 commercial properties and contacted 418. As a result of the tornadoes, 26% of businesses remained open, 71% closed temporarily, and 3% are still closed. Regarding damage, 20% experienced minimal damage such lost shingles, 24% minor damage, and 11% major damage. The main type of businesses affected were services, retail, manufacturing, and restaurants and 220 people lost employment. The total estimated financial impact, a total of \$8.6 million, encompassed structural and foundation, inventory and product, equipment and asset, sales, revenue and other costs.

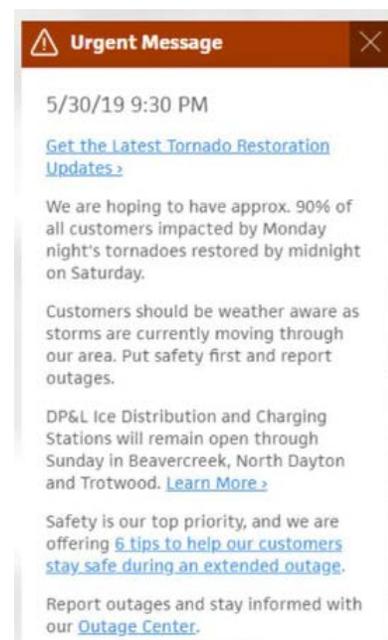
Exhibit 1-7 Disaster Recovery Walk Summary Data 2019



	Vandalia 6/17	Trotwood 6/26	Harrison - N. Main 7/17	Harrison Dixie 7/26	Email Campaign 7/29	Total
Commercial Properties Targeted	102	142	156	185	n/a	585
# of Volunteers	24	39	22	29	n/a	114
Business Touched	59	103	67	147	42	418
Did your business close as a result of tornado?						
Not Closed	37%	17%	27%	23%	36%	26%
Closed Temporarily	63%	79%	71%	75%	59%	71%
Still Closed	0%	4%	2%	2%	5%	3%
Damage Level						
No Damage	57%	44%	45%	44%	37%	45%
Affected	12%	14%	12%	24%	39%	20%
Minor Damage	20%	30%	33%	24%	7%	24%
Major Damage	12%	13%	10%	8%	17%	11%
Type of Business						
Health	3%	7%	20%	3%	3%	6%
Info Tech	3%	0%	0%	0%	5%	1%
Logistics	9%	0%	0%	1%	5%	2%
Manufacturing	12%	1%	5%	9%	50%	11%
Restaurant	6%	15%	11%	3%	3%	8%
Retail	11%	36%	20%	26%	11%	23%
Service	36%	36%	34%	55%	18%	40%
Wholesale	6%	0%	0%	3%	3%	2%
Other	14%	6%	10%	0%	3%	6%
Number of Employees						
Before Tornadoes	1,576	689	637	843	2,732	6,477
After Tornadoes	1,528	626	536	889	2,678	6,257
Estimated Financial Impact						
Structure/Foundation	\$38,000	\$720,000	\$120,000	\$170,500	4,010,250	\$5,058,750
Inventory/Product	\$41,250	\$25,075	\$101,200	\$8,200	36,120	\$211,845
Equipment/office/assets	\$12,500	\$1,000,000	\$0	\$0	190,000	\$1,202,500
Sales/revenue	\$538,500	\$217,600	\$269,500	\$63,000	465,000	\$1,553,600
Other	\$1,000	\$0	\$16,000	\$0	24,439	\$41,439
Total	\$607,250	\$5,620,000	\$508,500	\$477,000	\$1,453,559	\$8,666,309

Infrastructure Impact

The tornadoes impacted Montgomery County's infrastructure, causing even more distress to communities. About 5 million citizens did not have electricity for days. By June 7, 2019, 11 days after the storm, crews had restored power to all the areas significantly impacted. The tornadoes downed power lines and hit 85 traffic lights in Dayton.



The storms impacted Dayton's water system, resulting in a partial depressurization or boil advisory for nearly 410,000 customers in the greater Dayton area. Of those customers, approximately 250,000 receive water through a county-operated system. The city lost power to its water treatment plant's generators and residents were without potable water for four days until the water system was re-pressurized on May 30, 2019. The final boil advisory lifted on May 31, 2019. In December 2019, Dayton applied for \$4.7 million from the U.S. Economic Development Administration recovery grant for new generators to mitigate effects of large power outages.

The county lost power to both wastewater treatment plants and pump stations and advised residents to conserve water in preparation for generator shutdown. After the two pump stations lost power, county sewer workers had to divert 4.7 million gallons of wastewater directly into the Stillwater River.

A retention area of a water control facility located in Harrison Township sustained damage to approximately 1,053 linear feet of security fence. Additionally, the tornadoes damaged two pumps designed to push chamber water out of the wellfield. These wellfields are Dayton's fresh water source and the retention area discharges contaminants away from this fresh water source. Estimated damages for the water control facilities was \$127,000.

In addition to power outages, the tornadoes uprooted trees and damaged railings and fences. Fortunately, there was a positive volunteer turnout. Across the region people gathered to assist in removing debris and cleaning up. (Wilson, Baker, Kronenberger, Frolik, & Blizzard, 2019) There were also numerous water donations and participation in community watch for criminal activity.

Montgomery County road damages are likely underrepresented. The impacted roads are not built to sustain continued traffic to restore power and remove debris. Therefore, these costs will likely increase during the long-term recovery effort.

Prior to the tornadoes, Dayton had a high demand for demolishing blighted structures. The city utilized various funding sources to demolish hundreds of units in the past several years, including federal Community Development Block Grant (CDBG), Neighborhood Stabilization Program (NSP), state Moving Ohio Forward and local funding. However, the tornados added a significant number of additional properties to the demolition list. The city partnered with the Montgomery County Lank Bank to address some of these properties. The Ohio Housing Finance Agency utilized \$18.6 million in federal Hardest Hit Funds in Montgomery County to help eliminate blighted properties that depress nearby property values. These funds allowed the Montgomery County Land Bank to demolish 1,088 housing units, 80% of which were located in Dayton. Demolition remains a priority in the area, especially after the tornados.

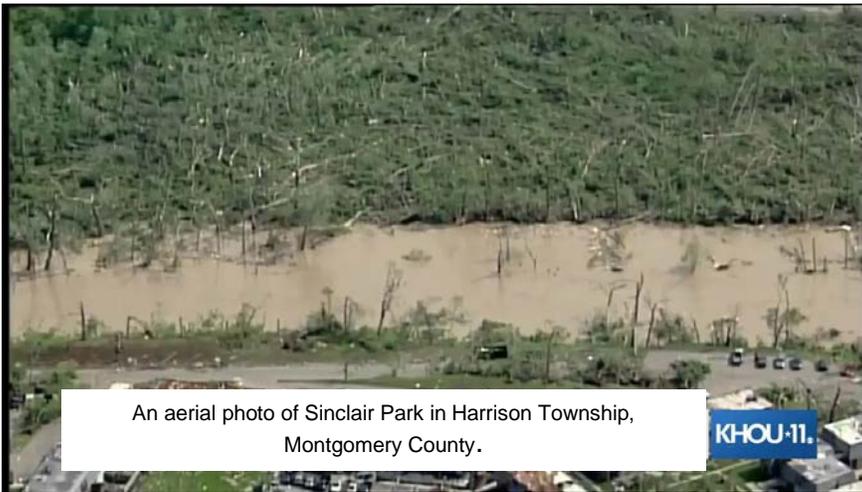
Environmental Impact

The Ohio Emergency Management Agency’s (EMA) Assessment Public Assistance Impacts Joint Preliminary Damage Assessment (Joint PDA) estimated debris removal for Montgomery County at more than \$6 million.

In Harrison Township, the tornadoes created an estimated \$765,000 in damage at Sinclair Park. The Park Club Housing, two picnic shelters, a storage building, a restroom, playground equipment, the park entrance signage and message board, and a cast concrete split rail fence sustained damage. In addition, more than 380 trees were destroyed and/or damaged. This accounts for approximately 90% of the park’s trees. This park was a focal point for tourism and community outings and celebrations in the greater Dayton area. Revenue loss from facility rentals makes the township’s recovery more challenging.

The destructive nature of tornadoes can cause environmental damage. Damaged buildings that expose gas lines can cause fires, releasing carbon dioxide into the atmosphere. Damage also kills animals and disrupts the food chain. Trees alone take about 100 years to grow to maturity and as numerous trees were destroyed by tornadoes, it impacts the neighborhood’s vitality, releases less oxygen into the environment, and decimates animal habitats. Farms hit by tornadoes create food shortages and profit loss. Lastly, land and water contamination effects human, animal, and plant health. (Achenbach & Samenow, 2019)





Dayton Memorial Park- North Dixie Drive cemetery sustained damages. More than 170 gravestones were

Housing Impact

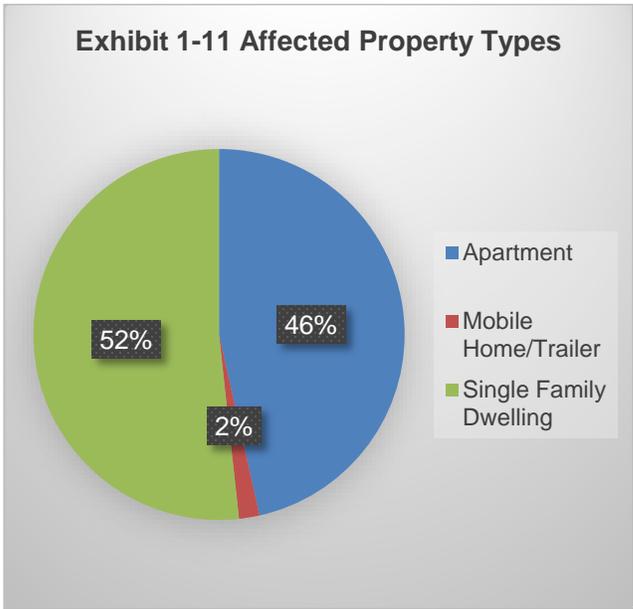
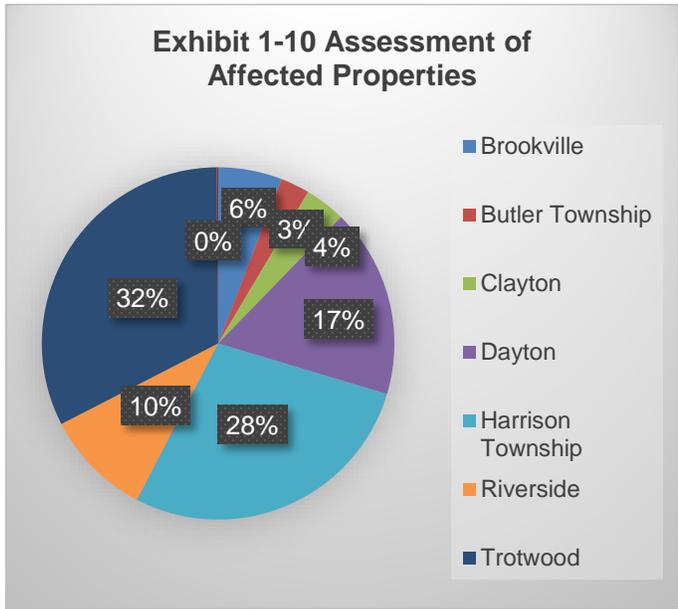
Tornado Damage Assessments

In the Federal Emergency Management Agency's (FEMA) Joint Preliminary Damage Assessment (Joint PDA), 974 properties were reported as damaged by the tornado event. However, the Affected Properties Damage Assessment, completed by the Montgomery County Auditor, reports 5,663 properties in Montgomery County were damaged as a result of the tornadoes. This increase in the number of damaged properties is 581% higher than the initial assessment.

The county auditor's assessment addressed properties not units. Therefore, the total number of damaged units is expected to be higher. The Auditor divided the analyzed properties into the taxable property types: apartments, mobile homes and trailers, and single-family dwellings. The calculations indicate that 2,633 apartments, 101 mobile homes or trailers, and 2,929 single family homes were affected by the storms. The table below also analyzes the assessment by jurisdiction.

Exhibit 1-8 Affected Properties Damage Assessment by Jurisdiction (June 2019)						
Jurisdiction	Affected	Destroyed	Inaccessible	Major	Minor	Total
Brookville						
Apartment	1					1
Mobile Home/Trailer	1					1
Single Family Dwelling	149	33	1	56	91	330
	151	33	1	56	91	332
Butler Township						
Apartment	1			4	6	11
Single Family Dwelling	45	8		10	77	140
	46	8	0	14	83	151
Clayton						
Apartment	26			1		27
Single Family Dwelling	105	12	1	16	51	185
	131	12	1	17	51	212
Dayton						
Apartment	86	71	3	139	199	498
Single Family Dwelling	242	23	1	75	145	486
	328	94	4	214	344	984
Harrison Township						
Apartment	9	292		138	285	724
Mobile Home/Trailer	70	12		6	12	100
Single Family Dwelling	298	44	1	150	268	761
	377	348	1	294	565	1585
Riverside						
Apartment	197	2		34	34	267
Single Family Dwelling	214	1		20	53	288
	411	3	0	54	87	555
Trotwood						
Apartment	120	629		251	105	1105
Single Family Dwelling	223	50	1	159	298	731
	343	679	1	410	403	1836
Vandalia						
Single Family Dwelling	4			1	3	8
	4	0	0	1	3	8
Grand Total	1791	1177	8	1060	1627	5663

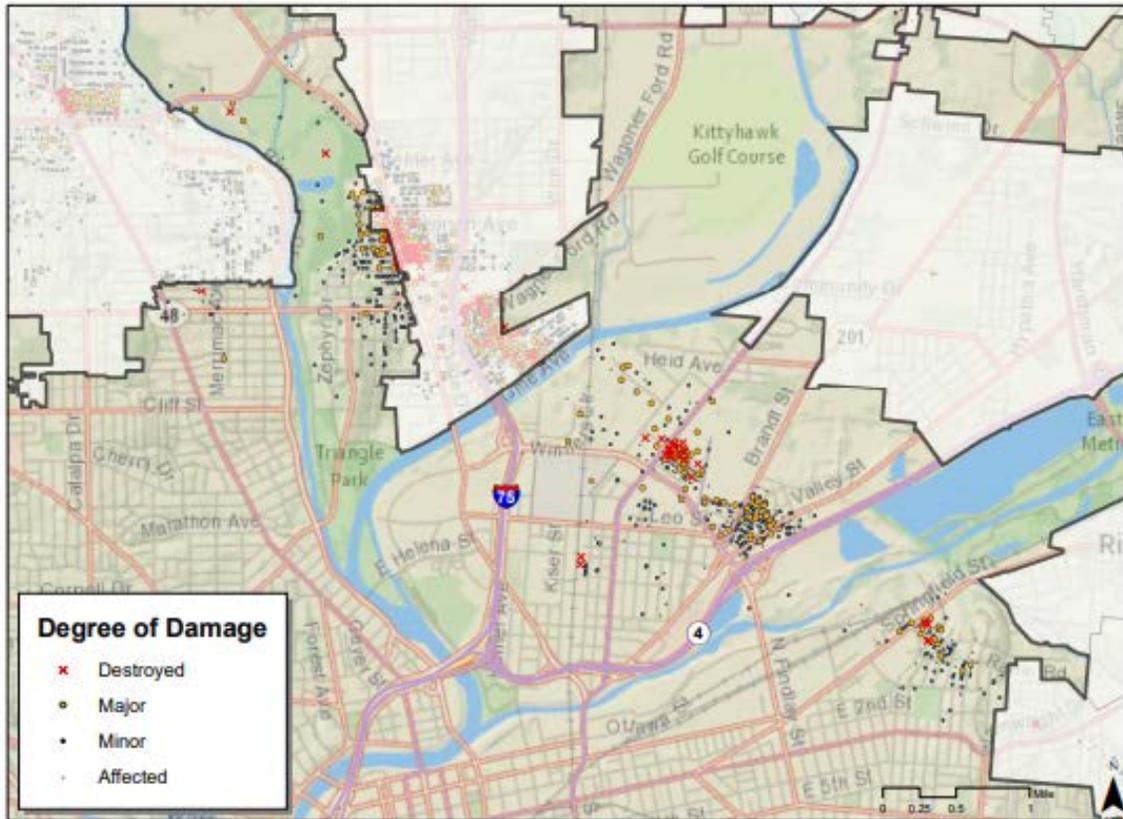
Exhibit 1-9 Affected Properties Damage Assessment by Housing Type (June 2019)						
Housing Type	Affected	Destroyed	Inaccessible	Major	Minor	Total
Apartment	440	994	3	567	629	2633
Mobile Home/Trailer	71	12	0	6	12	101
Single Family Dwelling	1280	171	5	487	986	2929
Grand Total	1791	1177	8	1060	1627	5663



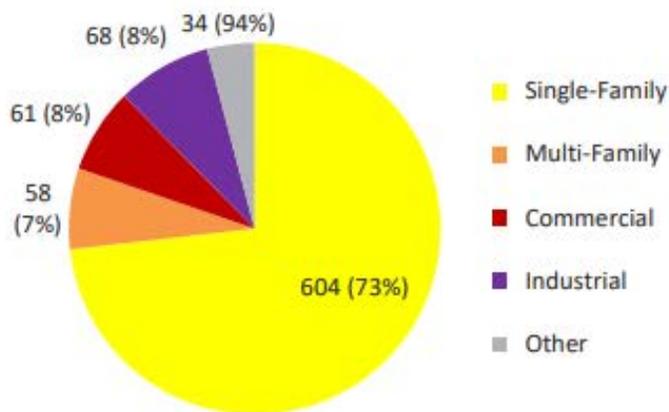
According to the most recent census bureau statistics, of Trotwood's 24,435 population, 51.3% are homeowners. Roughly half of the population resides in rental housing units. Damage assessment from the Trotwood area reveal the rental population was hardest hit by the tornadoes. With a median household income of just \$32,977 and a poverty rate of 25.6%, this population is most likely to experience housing instability as a result of the tornadoes.

Exhibit 1-12

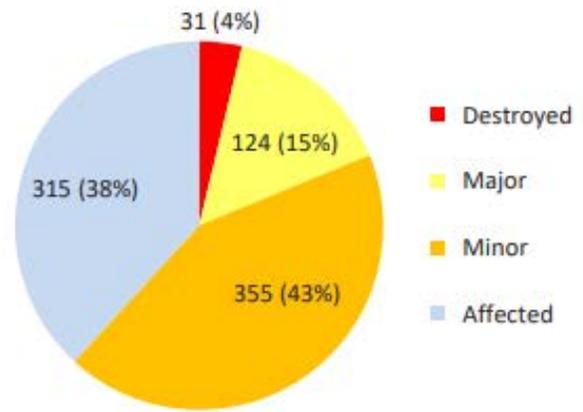
Dayton Tornado Damage Assessment



Affected Land Uses



Types of Damage

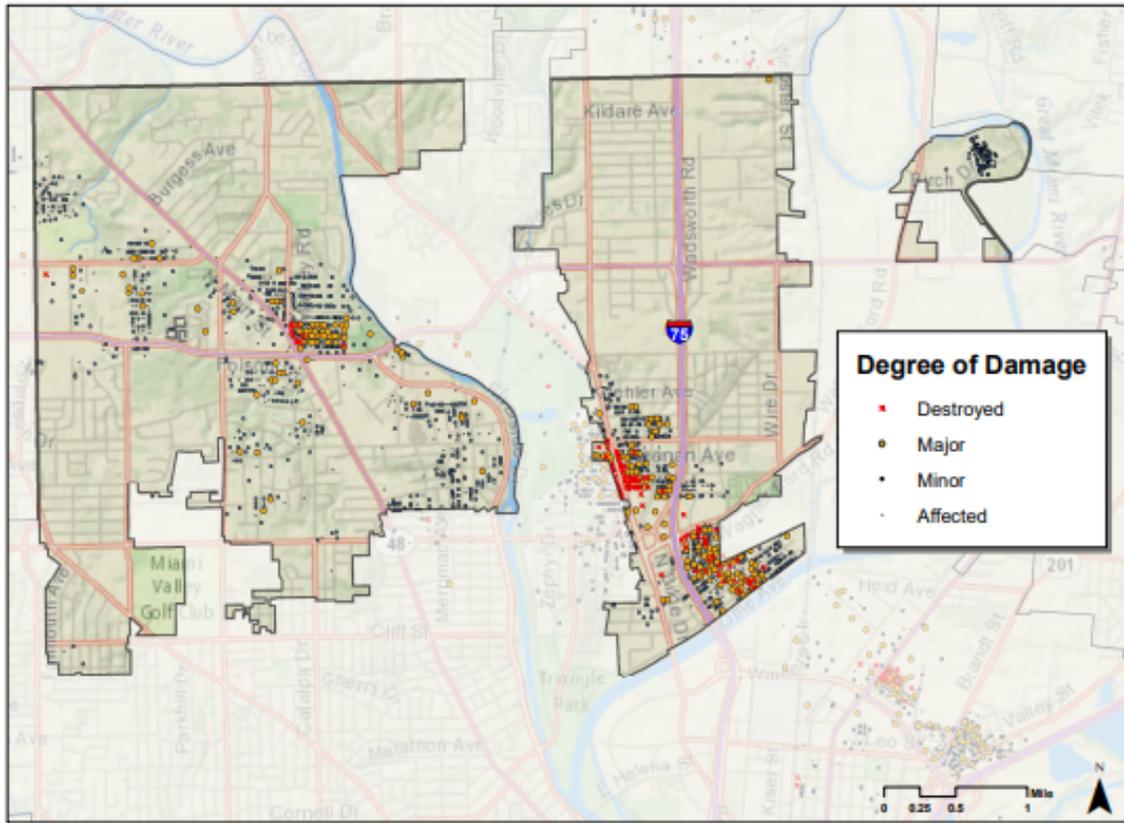


	Destroyed	Major	Minor	Affected
Single Family	12 (38.7%)	82 (66.1%)	266 (74.9%)	244 (77.5%)
Multi Family	5 (16.1%)	13 (10.5%)	13 (3.7%)	27 (8.6%)
Commercial	3 (9.7%)	9 (7.3%)	35 (9.9%)	14 (4.4%)
Industrial	9 (29.0%)	18 (14.5%)	20 (5.6%)	21 (6.7%)
Other	2 (6.5%)	2 (1.6%)	21 (5.9%)	9 (2.9%)
Total	31 (100.0%)	124 (100.0%)	355 (100.0%)	315 (100.0%)

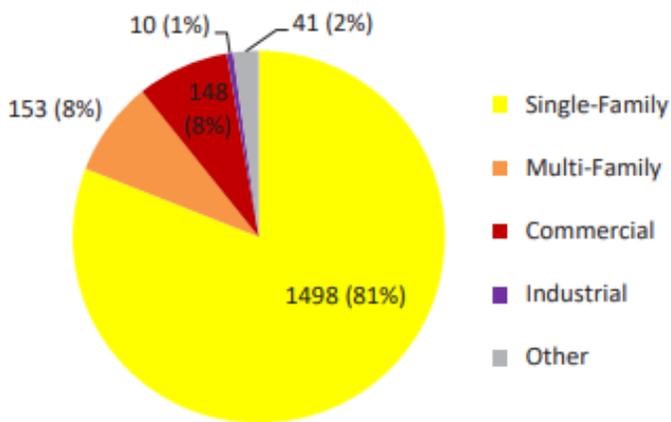
Date Produced: 11/12/2019
 Montgomery County Auditor
 Produced by MVRPC



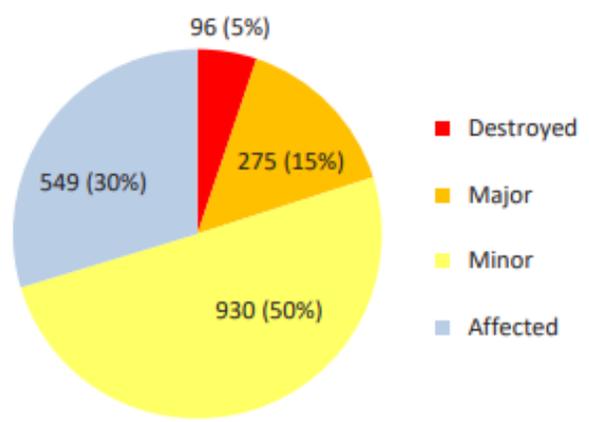
Harrison Township Tornado Damage Assessment



Affected Land Uses



Types of Damage

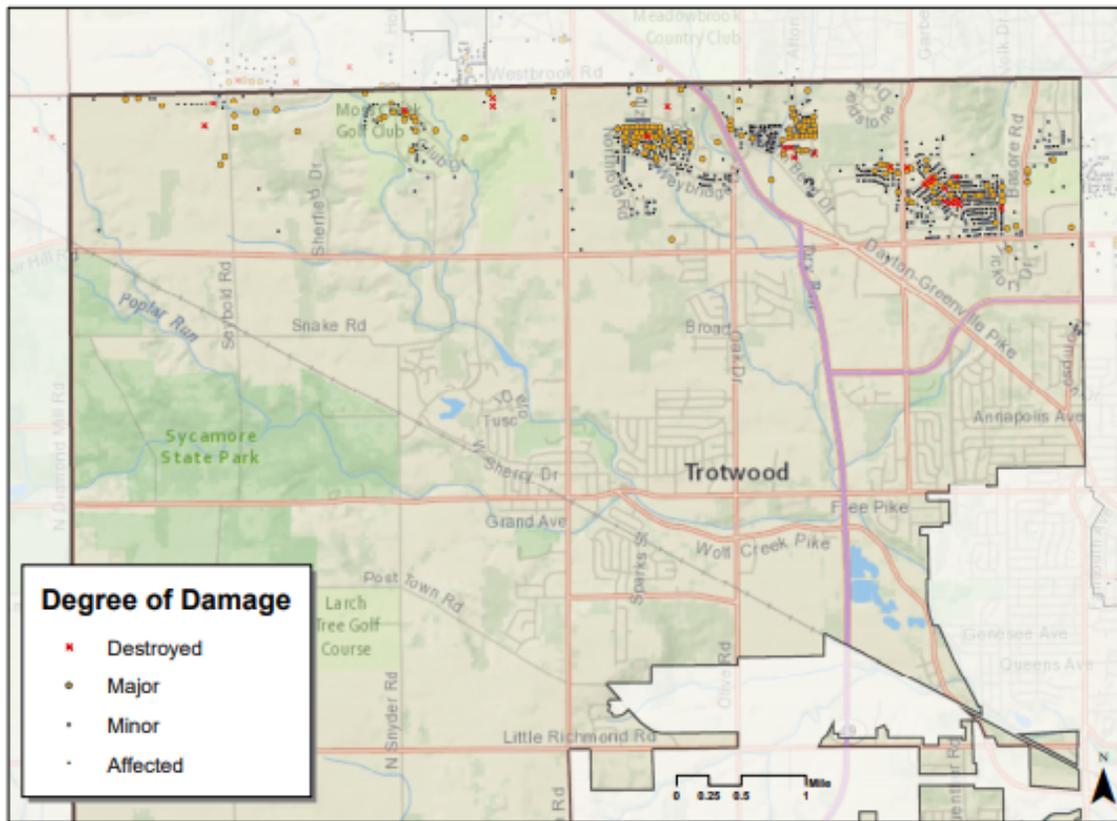


	Destroyed	Major	Minor	Affected
Single Family	51 (53.1%)	228 (82.9%)	844 (90.8%)	375 (68.3%)
Multi Family	2 (2.1%)	14 (5.1%)	14 (1.5%)	123 (22.4%)
Commercial	36 (37.5%)	28 (10.2%)	48 (5.2%)	36 (6.6%)
Industrial	0 (0.0%)	3 (1.1%)	3 (0.3%)	4 (0.7%)
Other	7 (7.3%)	2 (0.7%)	21 (2.3%)	11 (2.0%)
Total	96 (100.0%)	275 (100.0%)	930 (100.0%)	549 (100.0%)

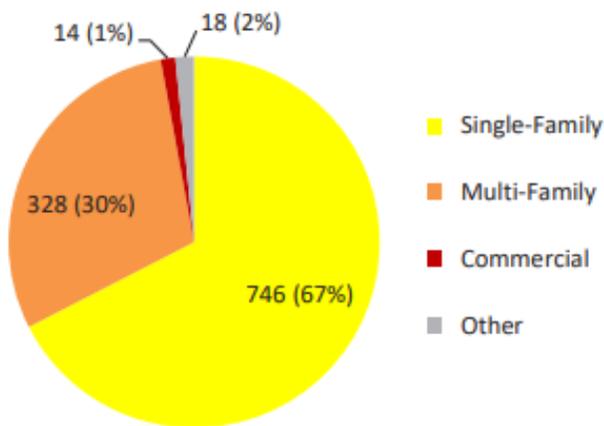
Date Produced: 11/12/2019
 Montgomery County Auditor
 Produced by MVRPC



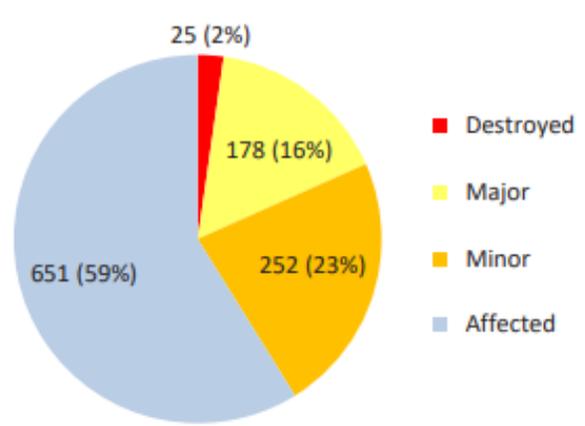
Trotwood Tornado Damage Assessment



Affected Land Uses



Types of Damage



	Destroyed	Major	Minor	Affected
Single Family	22 (88.0%)	148 (83.1%)	202 (80.2%)	374 (57.5%)
Multi Family	2 (8.0%)	18 (8.1%)	45 (17.9%)	263 (40.4%)
Commercial	0 (0.0%)	5 (2.5%)	2 (0.8%)	7 (1.1%)
Industrial	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)
Other	1 (4.0%)	7 (3.9%)	3 (1.2%)	7 (1.1%)
Total	25 (100.0%)	178 (100.0%)	252 (100.0%)	651 (100.0%)

Date Produced: 11/12/2019
 Montgomery County Auditor
 Produced by MVRPC



Housing Impact for Vulnerable Populations

Individuals with access and functional needs limitations will require assistance with accessing and/or receiving disaster resources. These individuals can range from children to older adults, physically disabled to having limited English proficiency. Specialized resources may include, but are not limited to social services, accommodations, information, transportation, or medications to maintain health. Regardless of the nature of the need, recovery efforts must ensure that all individuals are able to access disaster recovery resources. It is imperative that the county is aware of these populations because they are most affected and their ability to be resilient is limited.

Homeless/ Transitional Housing

Montgomery County has emergency shelters and rapid re-housing assistance available, funded by the Ohio Development Services Agency's Office of Community Development. During peak times in the days following the tornadoes, the American Red Cross operated five temporary shelters assisting a total of 126 people. Montgomery County has four permanent emergency shelters that operate as a part of the community's homeless crisis response system. The shelters are the St. Vincent de Paul Shelter for Women and Families, Gettysburg Gateway for Men, Daybreak Youth Shelter and the YWCA Dayton Domestic Violence Shelter. The tornadoes caused minor damage to one of the St. Vincent de Paul Safe Haven properties, which provides housing and case management for the severely mentally ill; however, service delivery continued. In addition, the St. Vincent de Paul Queen of Martyrs Conference, which provides services such as utilities and rent assistance, clothing and food to low-income families temporarily suspended providing direct services. As of this report, direct services have been restored.

The typical path to access Rapid Re-Housing (RRH) is for the individual or family residing in an emergency shelter. Montgomery County had adequate shelter beds available with the flexibility to absorb large increases in shelter demand. However, the shelters never experienced a substantial increase in demand. Following the tornadoes, the region lead added a question to the Homeless Management Information System (HMIS) to capture if people were displaced by the tornadoes. As of March 2020, 52 households entering emergency shelters indicated they were seeking shelter as a result of the tornadoes. Those households are comprised of 46 single adults and six families (five with children and one couple without children).

While the number of households entering the emergency shelter system has been modest in comparison to the number of impacted households in the county, the homeless system has been impacted in other ways. The tornadoes damaged more than 1,000 apartment units and destroyed or majorly damaged an additional 1,500 more. According to data from Montgomery County Auditor, 2,633 affordable and subsidized housing units were damaged or destroyed, adding more strain on an already challenged affordable housing market. The average length of time households experience homelessness at the system level before and after the tornadoes increased by four days. In addition to losing housing units, the homeless system has also experienced a significant increase in rental costs as a result of the demand for housing from those displaced by the tornadoes. It has become a suppliers market and demand for housing following the tornadoes has allowed landlords to add additional fees and charges to maximize profit.

Approximately 179 individuals receiving services through the Montgomery County Board of Developmental Disabilities Services (MCBDDS) were also impacted by the incident. One of the hardest

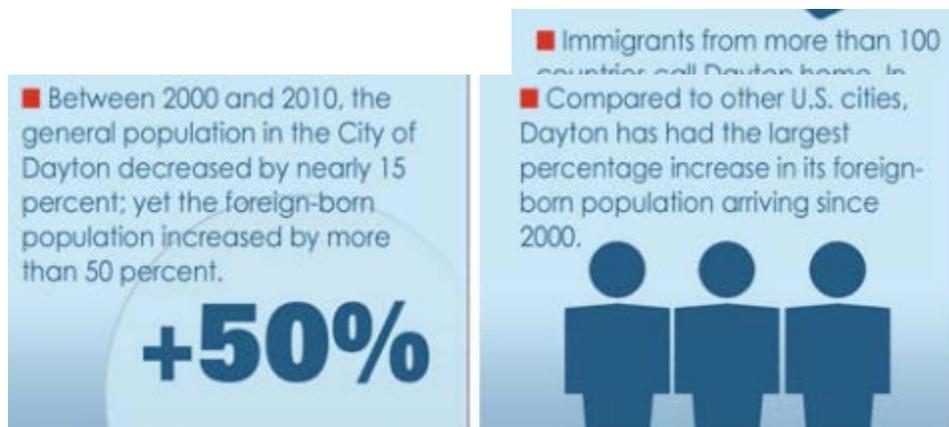
hit areas, Trotwood, saw more than 1,800 residential units damaged and more than 600 destroyed. Several supported living settings were destroyed or damaged as the area is home to a significant number of individuals receiving MCBDDS services. Immediately after the incident, the MCBDDS and the Miami Valley In-Ovations (MVIO) staff worked to provide temporary housing for individuals displaced by the storms and coordinated an array of services to promote continuity of care. MVIO was not able to allow residents to return to the properties and requested they move forward with securing long-term alternative housing operations for the individuals impacted by the incident. MVIO does intend to repair the properties, but the timeframe is unknown. Approximately 60 individuals resided in properties that sustained some type of damage related to the storm.

Echoing Woods Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID) relocated 31 individuals which required them to share space with 30 individuals at a sister facility. The MCBDDS is working with the Ohio Department of Developmental Disabilities and Montgomery County Alcohol, Drug Addiction and Mental Health Services to facilitate renting space on the grounds of the former Montgomery Developmental Center (MDC) to house displaced individuals.

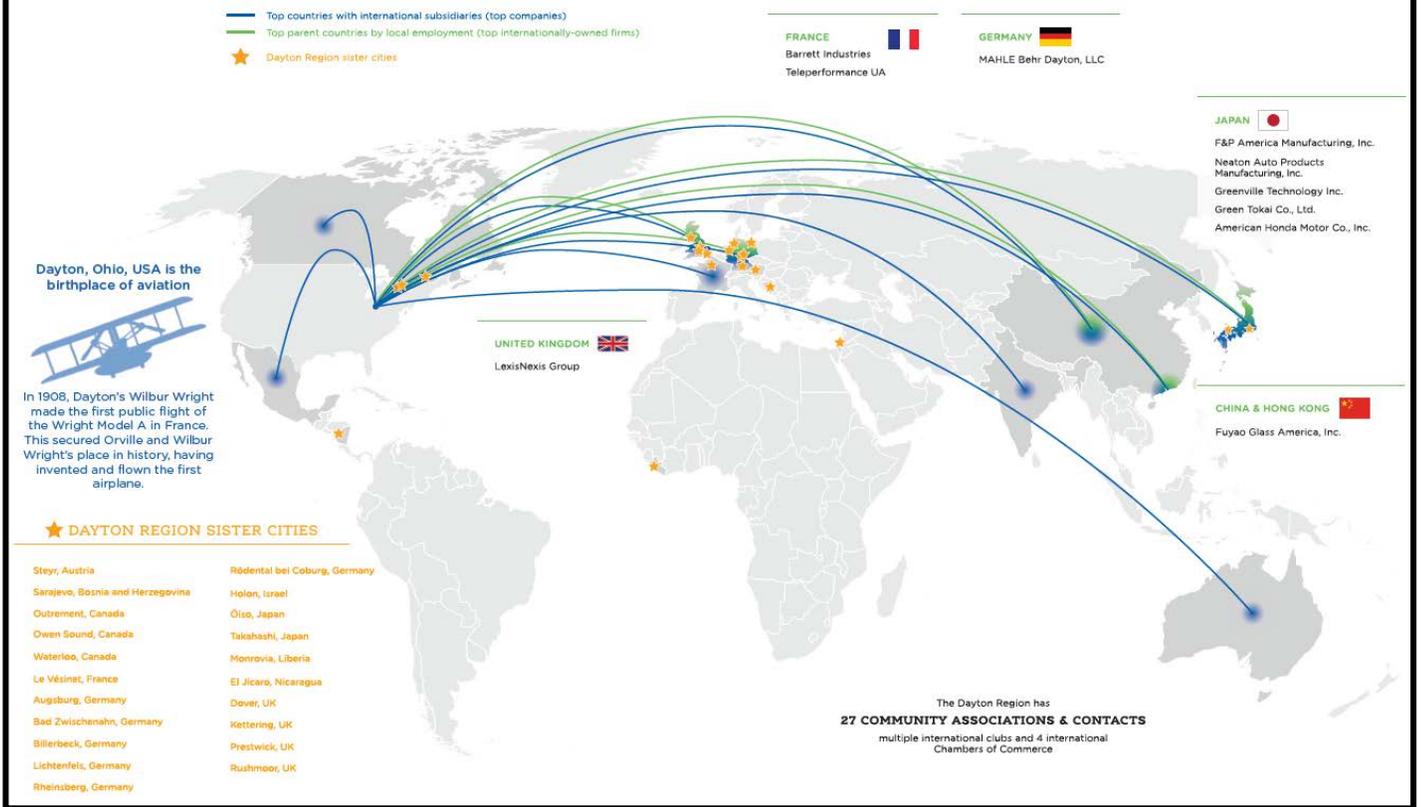
Residents displaced as a result of the tornado addressed their housing needs in a variety of ways. They moved in with friends and family, hotels and homeless shelters, and some lived out of their cars. Also, some families had to separate and couch surf between households or choose to remain in their damaged homes. Citizens are aware that recovery efforts could take time. Therefore, nonprofits and churches have assisted with rebuilding efforts, housing, feeding and clothing residents, and providing necessities. FEMA also played a role in providing housing resource fairs and hosting housing recovery events. In addition to searching for temporary shelter, residents had difficulty finding permanent housing. Properties that were once habitable were either too expensive or unclean. Applying for multiple housing units is cost-prohibitive for most households in the area.

Limited English Proficiency (LEP).

According to U.S. Census data and demonstrated in Exhibits 1-16 and 1-17, approximately 6% of the population in the county speaks a language other than English at home and 2.4% do not understand English well. Service providers will take careful consideration of the language needs of these populations during the applicant intake process. The U.S. Census estimated 499,313 citizens age 5 and older in Montgomery County, nearly 12,000 residents in the impacted county, do not speak English well. The national origin for new citizens in Dayton in the past five years have been Russia, India, Turkey, the Philippines, and Mexico, and the most predominate non-English languages in the area are Turkish and Spanish.



THE GLOBAL REACH OF THE DAYTON REGION



PEOPLE AND LANGUAGE

35,635
 residents were born outside the United States



In the last five years, an estimated **4,300 PEOPLE** moved from another country to the Dayton Region.



TOP 5 countries of origin for immigrants

- 1 India
- 2 China
- 3 Mexico
- 4 Philippines
- 5 Germany

TOP 5 languages other than English spoken at home

- 1 Spanish
- 2 Arabic
- 3 Chinese
- 4 German
- 5 French

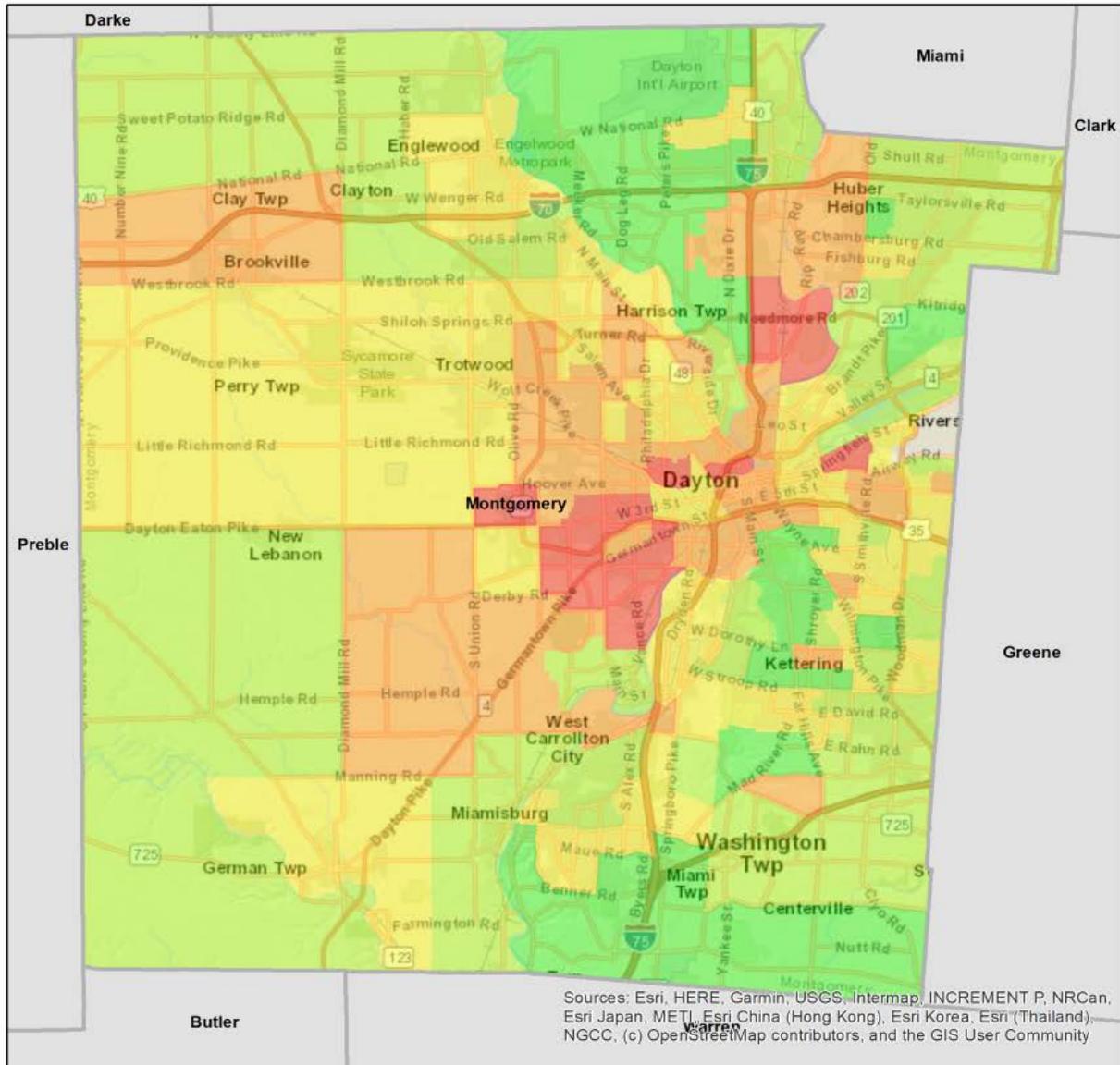
Special Needs Populations

Exhibit 1-15 illustrates the majority of persons with disabilities reside in Dayton, close to available services. A high percentage of residents also live in Brookville, Clay Township and Huber Heights. The darker green to red is a hue from the least to greatest percentages of the disable population. Areas in orange and red have the highest percentage of residents with disabilities. Persons suffering from disabilities have a hard time surviving, let alone recovering from disasters. In the aftermath of disaster, these people are often unable to seek additional assistance due to the barriers to accessing services. For this reason, these populations are considered vulnerable with higher risks and greater needs.

Percent of Persons with a Disability by Census Tract in Montgomery County



Development Services Agency



0 0.75 1.5 3 4.5 6 Miles



Ohio Development Services Agency
Office of Community Development
Source: 2018 5 Year ACS

Date: 3/12/2020

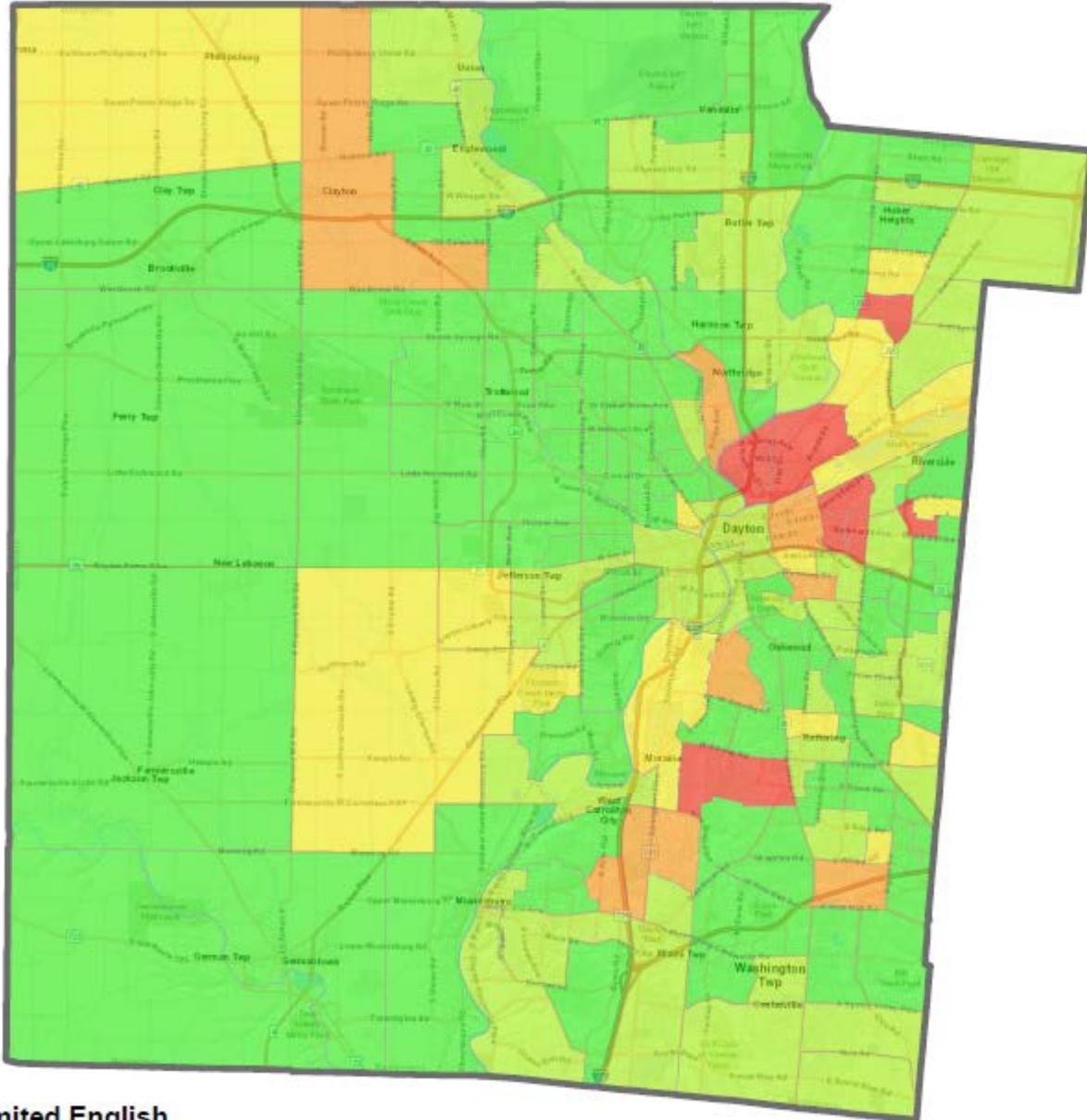
Percentage of persons who speak English "less than well"



Development Services Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor

Lydia L. Mihalik, Director



Limited English

- 0% - 0.5%
- 0.6% - 1.5%
- 1.6% - 2.8%
- 2.9% - 4.6%
- 4.7% - 7.7%

Data source: Centers for Disease Control and Prevention/
Agency for Toxic Substances and Disease Registry
Social Vulnerability Index 2018 Database Ohio
<https://svi.cdc.gov/data-and-tools-download.html>

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Elderly

Age contributes to a household's potential vulnerability. Emergency relief and even basic services are often hard to access for older residents. Some citizens older than 65 are likely not to have access to personal vehicles, creating a barrier to obtaining services. Also, according to 2018 ACS data for Montgomery County, the median retirement income is \$26,875. This limited income makes it difficult to recover from disasters. Exhibit 1-17 highlights adults age 65 or older comprise more than 25% of the population, many living in the impacted counties.

LMI Populations

Exhibit 1-18 shows where the low-to-moderate (LMI) population is most concentrated. LMI residents live in Dayton's inner city, and extend as far as Trotwood, Harrison Township, and the outskirts of Kettering along I-75 and I-35. Unfortunately, the tornado damage occurred mostly within these zones. Because residents in these areas are already LMI, it will be difficult to reverse Montgomery County's economic trend. According to 2018 ACS data, 36.2% of Montgomery County's population is at or below 199% of the poverty level.

Many of the affected areas have a high percentage of uninsured low-income families. These survivors may not have the means to rebuild and/or relocate without additional support. There are also neighborhoods that do not welcome federal and/or state support and are therefore not receiving any needed assistance.

Public Housing Authority

Greater Dayton Premier Management (GDPM), the local public housing authority, did not experience major damage to its public housing units, other than power loss. Currently, the GDPM has two properties, with a combined total of approximately 85 units with outstanding damage from the tornadoes. GDPM plans to address the storm damage during rehabilitation to eliminate disruption to clients currently residing in the properties. The units that sustained damages were covered by insurance, however, GDPM will need additional capital funds as well as to complete the rehabilitation for both properties.

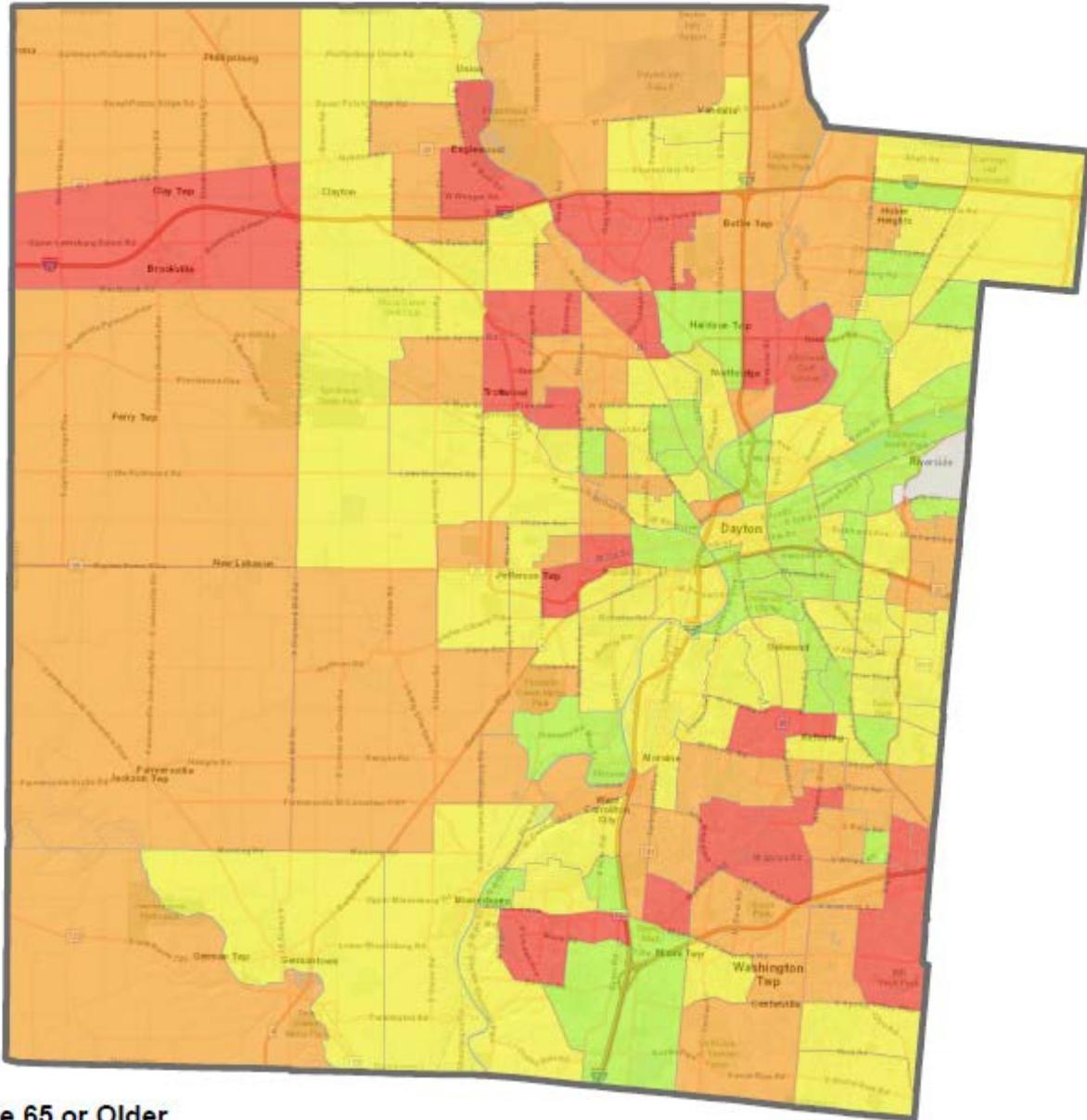
Percentage of persons aged 65 or older



Development Services Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor

Lydia L. Mihalik, Director



Age 65 or Older

-  no data available
-  0.5% - 12.2%
-  12.6% - 18.3%
-  18.5% - 24.8%
-  25.4% - 44.6%

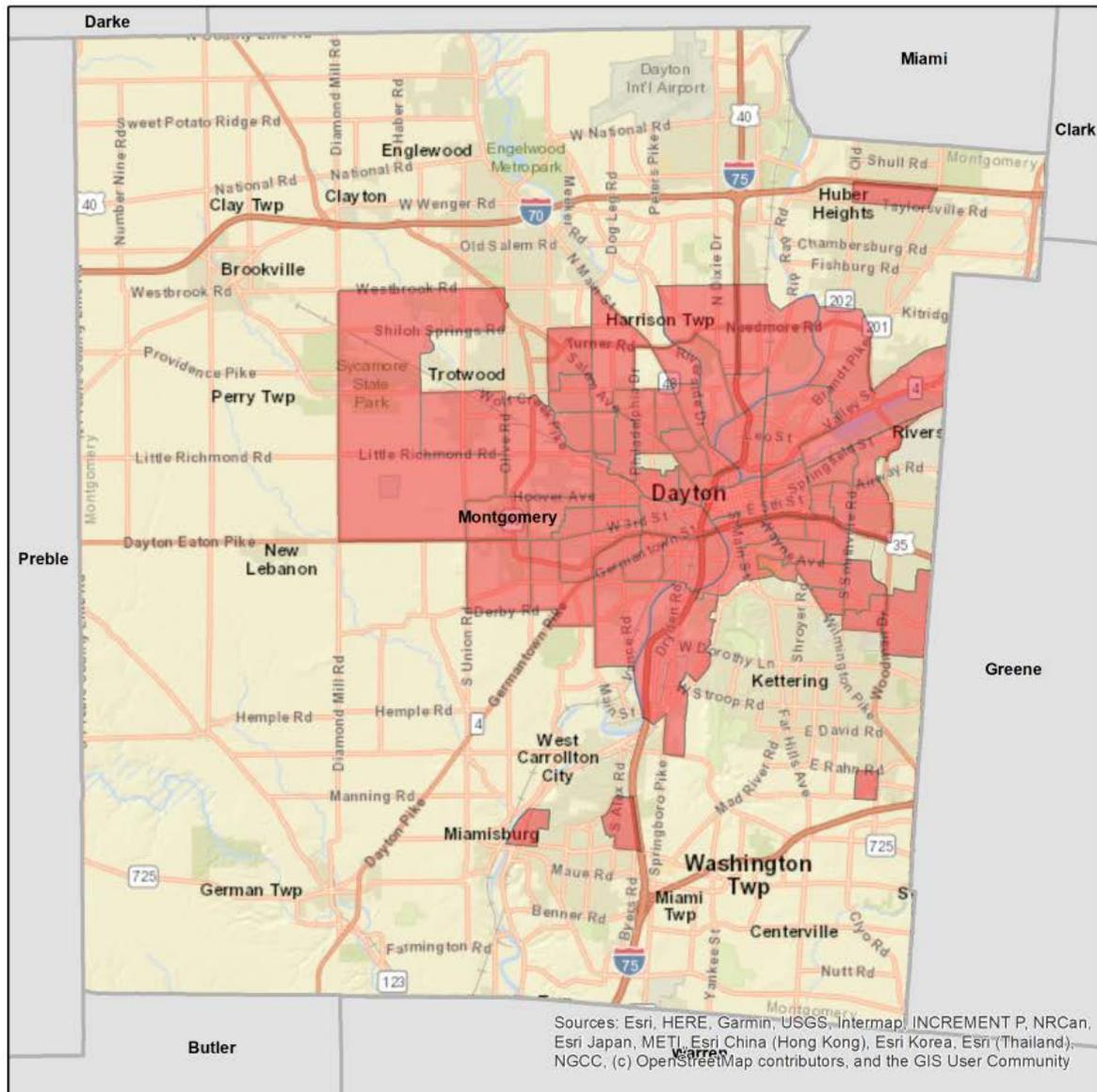
Data source: Centers for Disease Control and Prevention/
Agency for Toxic Substances and Disease Registry
Social Vulnerability Index 2018 Database Ohio
<https://svi.cdc.gov/data-and-tools-download.html>

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Census Tracts $\geq 51\%$ LMI in Montgomery County



Development Services Agency



Ohio Development Services Agency
Office of Community Development
Source: 2015 LMI Data

Date: 3/12/2020

Speed to Repopulate Area

Helping communities affected by the tornadoes restore some level of normalcy is a long-term effort. Commercial, residential, and other buildings and facilities must be repaired, rebuilt, or demolished and restored. Also, replenishing the broken and uprooted trees in communities will not only take time, but a significant financial investment. In addition, assistance to businesses and service providers to continue operating are critical.



Repair and cleaning efforts begin on a neighborhood damaged by a tornado system that destroyed homes and cut off access to utilities in Dayton, Ohio. (John Minchillo/AP)



Storm damage litters a residential neighborhood, in Dayton, Ohio, Tuesday, after a rapid-fire line of apparent tornadoes tore across Indiana and Ohio overnight. The storms were packed so closely together that one crossed the path carved by another. *John Minchillo/AP*

Financial Impact

Until the Office of Community Development (OCD) secures data from FEMA, SBA and the Ohio Department of Insurance, total losses are unknown. However, the Columbus Dispatch reported in August 2019 insured losses from the storms impacting western Ohio total between \$465 million and \$480 million to date based on insurer survey data from the Ohio Insurance Institute. Ohio Insurance Institute president, Dean Fadel, stated that total is conservative and likely to increase. To date, insured clients filed more than 30,000 claims, about 70% of which are homeowner or auto claims. (Williams, 2019)

Furthermore, Montgomery County experienced a significant economic impact due to the tornadoes. According to Dayton Daily News, the city lost \$46.3 million in property values. Also, the county auditor stated a \$1.7 million loss in tax revenues that went to schools, libraries, parks, townships, and cities in 2020. Schools alone would lose more than \$900,000. Exhibit 1-19 shows tax losses by jurisdiction, schools, and services. (Stewart, Memorial Day tornadoes' toll: \$46.3M in lost property values, schools to lose big, 2019)

Exhibit 1-19 Tax impact from Memorial Day tornadoes on Montgomery County

Tax impact from Memorial Day tornadoes			
CITIES	Applications received	Total reduction in taxable value	Tax revenue loss
Trotwood	418	-\$18,430,000	-\$151,000
Dayton	205	-\$7,892,000	-\$28,000
Brookville	99	-\$3,173,000	-\$1,000
Clayton	33	-\$2,102,000	-\$8,000
Vandalia	16	-\$2,306,000	-\$3,000
Riverside	13	-\$1,145,000	-\$4,000
Englewood	7	-\$221,000	-\$435
SCHOOLS	Applications received	Total reduction in taxable value	Tax revenue loss
Trotwood-Madison City Schools	394	-\$16,773,000	-\$320,000
Dayton Public Schools	374	-\$10,635,000	-\$248,000
Northridge Local Schools	236	-\$5,625,000	-\$121,000
Brookville Local Schools	134	-\$4,409,000	-\$63,000
Vandalia Butler City Schools	59	-\$3,822,000	-\$61,000
Northmont City Schools	52	-\$3,741,000	-\$72,000
Mad River Local Schools	13	-\$1,145,000	-\$23,000
TOWNSHIPS	Applications received	Total reduction in taxable value	Tax revenue loss
Harrison Twp.	401	-\$8,353,000	-\$126,000
Perry Twp.	121	-\$3,987,000	-\$6,000
Butler Twp.	43	-\$1,516,000	-\$11,000
Clay Twp.	6	-\$234,000	-\$1,000
OTHER GOVERNMENTS	Applications received	Total reduction in taxable value	Tax revenue loss
Human Services Levy	1,268	-\$46,265,000	-\$223,000
Sinclair Community College	1,268	-\$46,265,000	-\$66,000
Dayton Metro Library	1,267	-\$46,254,000	-\$53,000
Miami Valley Career Technology Center	881	-\$34,485,000	-\$46,000
MetroParks	1,268	-\$46,265,000	-\$32,000
Montgomery County	1,268	-\$46,265,000	-\$28,000
Developmental Disabilities	1,268	-\$46,265,000	-\$6,000
TOTAL	Applications received	Total reduction in taxable value	Tax revenue loss
Total	1,268	-\$46,260,000	-\$1,700,000
Source: Montgomery County Auditor's Office			

Recovery Efforts

Montgomery County's Disaster Recovery follows the FEMA Disaster Recovery Continuum: short-, intermediate and long-term recovery. Short-term recovery focuses on the days following the disaster including mass care and sheltering, clearing transportation routes, business support and emergency medical care. Intermediate recovery lasts weeks to months and includes interim housing, debris removal, business support, health care continuity, and community engagement to rebuild communities. Long-term recovery can take 10 years or more. Long-term recovery includes permanent housing, rebuilding infrastructure, revitalizing the economy, reestablishing healthcare systems and mitigation activities. Montgomery County is now focused on the community's long-term recovery.



Short-Term Recovery

Immediate Response Assistance

The county suggested residents affected by the tornadoes contact their landlord or property management company to request recommendations for alternate living situations and terminating rental agreements to locate suitable housing arrangements in the tornadoes' aftermath. Also, residents were eligible for a refund of their security deposit as a result of vacating inhabitable housing. Residents could utilize resources such as grant and loan programs to receive funding to repair homes and businesses. Overall, communities utilized charitable and nonprofit services available to them. In addition to managing housing issues, communities prioritized clearing debris and providing water and basic living items.



Volunteers offer water and assistance to neighbors in Terrace Park, after tornadoes touched down in Brookville, destroying numerous homes and leaving scattered debris on May 28, 2019. Meg Vogel



Volunteers distributed food and supplies at Kroger on W. Siebenthaler Ave., in Dayton on May 31, 2019. Relief efforts continue after multiple tornadoes struck the area on May 27th. The National Weather Service rated the tornadoes as high as EF3. Sam Greene/The Enquirer



Volunteers from Mathew 25 Ministries and Procter & Gamble collect laundry to be washed for free at the Home Depot location on Salem Road in Trotwood on May 31, 2019. Relief efforts continue after multiple tornadoes struck the Dayton area on May 27th. The National Weather Service rated the tornadoes as high as EF3. Sam Greene/The Enquirer



Paulina Ambrosio, 14, of Dayton, unpacks pallets of diapers at the Mathew 25 Ministries relief depot at the Montgomery County Fairgrounds in Dayton on May 31, 2019. Relief efforts continue after multiple tornadoes struck the area on May 27th. The National Weather Service rated the tornadoes as high as EF3. Sam Greene/The Enquirer

Stakeholders in Community

- Assistance for Homeowners
 - United Way's 211 Helplink- Helps navigate the local nonprofit network and assist with problem solving and crisis intervention.
 - Miami Valley Community Action Partnership – Helps with moving expenses, rental deposit, rent and utility payments, and short-term case management.
 - St. Vincent de Paul Conferences – Aids with moving expenses, rental deposits, rent and utility payments, and short-term case management.
 - Miami Valley Fair Housing Center – Works to eliminate housing discrimination and ensure equal housing opportunity for all people.
 - Auditors Office Notice for Home/Property Owners – Determines eligibility for a deduction in taxable property value.
 - Greater Dayton Premier Management- (Metropolitan Housing Authority)- administers housing choice vouchers and offers public housing. – Gives additional preference points to people displaced by the tornado for its public housing units per HUD approval.
 - Ohio Realtors Housing Disaster Relief Fund – Provides up to \$1,000 to qualified applicants to assist with owner or rental repairs resulting from the tornadoes.
 - Miami Valley Community Action Partnership - Partners with local communities to eliminate poverty causes and conditions and promote individual independence and self-sufficiency.
 - Available Housing Units (MVCAP) – Provides a map of available units
 - Federal Loan Bank Disaster Reconstruction Program (DRP) – Provides grants of up to \$20,000 toward repair of their primary residences, or eligible for \$5,000 towards purchasing a home to eligible homeowners in Greene, Miami, and Montgomery counties following the storms.
 - Montgomery County Transitional Housing – Provides short-term stay and assistance in locating and moving into permanent home. Units operated by charities or nonprofits for single parents, children, the disabled, and others in the Montgomery County and greater Dayton community.
 - Dayton Foundation - Established a Disaster Relief Fund to support the tornadoes' immediate aftermath by supporting groups' emergency efforts. Committed additional funds for long-term disaster recovery efforts. Also provided volunteers and volunteer coordination.

- Salvation Army – Provides financial assistance for utility and energy bills, shelters for homeless men, women and children, rent assistance, emergency food and heating bills payment assistance, free school supplies, winter coats, and social development programs.
 - Germantown Community Services – Volunteer-run assistance program that helps people living in Farmersville and Germantown with mortgage and rent expenses, food, utilities, heating bills, and medication.
 - Community Action Partnership of the Greater Dayton - Provides various assistance programs and services for families and individuals residing in Montgomery, Butler, Darke, Greene, Warren and Preble counties.
 - Volunteers of America – Provides advice to low-income and working poor families struggling with rent payments or facing eviction. Food, thrift stores, and Christmas toys or gifts may also be offered in Dayton.
 - Veterans Service Commission - a county agency dedicated to serving Montgomery County veterans and helping veterans.
 - Veterans Affairs Disaster Assistance – Provides current disaster guidance, forbearance requests, moratorium on foreclosures, late charge waivers, credit and VA reporting, and VA Home Loan information.
 - DAV Disaster Relief - Provided a total of 470 drafts totaling \$296,250 and roughly 370 Comfort and Hygiene supply kits. The kits – which included backpacks, blankets and hygiene kits – provide an additional resource for safety, comfort, and self-sufficiency in an extended emergency, disaster or evacuation.
 - Montgomery County Veterans' Services Deductible Assistance – Provides assistance when navigating U.S. Department of Veterans Affairs (VA) services including compensation claims and widows' benefits. Financial assistance to eligible veterans and family members with a demonstrated need.
 - Airman and Family Readiness Center - Offers emergency financial assistance and grants to military members and their families in Montgomery County. Funds can be used to pay for rent, vehicle repairs, miscellaneous living expenses, funeral costs, or other expenses. Some expenses, such as medical and dental bills, will be covered by no-interest loans.
- Assistance for Businesses
 - Small Business Association - Offers low-interest disaster loans direct from the U.S. Treasury for businesses of all sizes, nonprofit and faith-based organizations, and homeowners and renters for underinsured and uninsured losses.
 - Dayton Area Chamber of Commerce – Provides resource listing for impacted business owners.
 - Business First - Connects businesses with resources and assistance.
- Local Charities and NPOs
 - Foodbank Pantry- serves as the primary source of food for the hunger relief network in the Miami Valley. Relieves hunger in the community through a network of partner agencies by acquiring and distributing food
 - Local Churches provide spiritual support and guidance
 - Montgomery County Department of Job Prevention and Human Services – Provides job and financial assistance.
 - East End Community Service Corporation - Provides emergency financial assistance paying utility, water, heating, and electric bills before disconnection.
 - Sunrise Center - Offers referrals to Montgomery County programs, coordinates and advises individuals and families on available social services.

- Good Neighbor House – Provides advice and assistance to residents living in poverty on food assistance, counseling, wellness education, medical and dental care, and clothing.
- Gospel Mission - Focused on food as part of the Fishes and Loaves Program. Also provides furniture, counseling, gently used computers for job seekers, and other basic needs.
- Medical Assistance
 - Reach Out of Montgomery Ohio – Provides information on and access to healthcare services by helping children and their families find a primary healthcare provider, insurance, and prescription medications.
 - Wellness Connection of Miami Valley - Provides health care and medical bill assistance to improve conditions for individuals and families that may be afflicted with heart disease and cancer through direct service (medication and equipment assistance, help with bills and advice on medical debts, transportation, support groups), promoting health awareness, and supporting health care professionals in Montgomery County.
 - Montgomery County Clinics – Provides medical services through nonprofit, government-certified, and/or free community clinics.
- Legal Assistance and Document Replacement
 - Legal Aid of Western Ohio (LAWO) – Provides free help with civil legal problems.
 - Advocates for Basic Equal Equality (ABLE) – Provides free help with civil legal problems
 - County Recorder – Provides free property deeds to homeowners who have been directly and substantially impacted.
 - VITA Tax Assistance - Provides advice, guidance, and free tax returns.
 - Department of Job and Family Services of Montgomery County – Accepts applications for state and federal government public aid and benefits. The Dayton office administers assistance programs for low-income households, elderly, veterans, and disabled populations.
 - Greater Dayton Volunteer Lawyer - Offers free civil legal services, advice, and consultations to low-income individuals in Montgomery County.

Community Feedback

Communities were terrified and devastated when the 20 catastrophic tornadoes occurred on Memorial Day 2019. Residents were primarily concerned about family members; wondering if they were hurt, where they will live, and if they will be able to provide for them. In the aftermath, residents are still concerned about repair costs and, if they have it, what insurance will cover. Residents are also upset about losing their possessions and the devastation the tornadoes caused in their communities.

However, residents responded powerfully. Surrounding cities and townships helped with recovery efforts by volunteering to provide water, helping with debris removal, and donating necessities to affected residents. Cincinnati-based Proctor and Gamble supplied laundry trucks for residents to wash laundry free of charge. While they wish the recovery process was quicker, residents remain hopeful and resilient and continue to work together to rebuild their communities.

After the storms, residents told the Dayton Daily News that within hours, neighbors started working to remove trees, provide food and water, and organize volunteer cleanup efforts. “There were people coming down the hill with food and supplies for a good solid month,” said one Dayton resident.

Residents want some normalcy as quickly as possible. They are proud of their resilience and grateful for help and donations but are concerned about being forgotten. Recovery efforts has not fully restored their communities and they continue to need support.

Short-Term Assistance

Montgomery County residents received individual and public assistance from Federal Emergency Management Agency (FEMA). Ohio Development Services Agency's (Development), Office of Community Development (OCD) is currently working to secure a data feed detailing the assistance FEMA provided. OCD is also working on a Memorandum of Agreement (MOA) with the Ohio Department of Insurance and Small Business Administration.

Many people turned to the federal government for help. According to the Dayton Daily News, FEMA received 4,632 applications for assistance from Montgomery County, 600 from Greene County and 117 from Miami County. Montgomery County residents who rent submitted more than half of the applications. Of the 2,726 homeowners and 2,604 renters who applied for help from FEMA, 254 homeowners and 1,057 renters were approved. In total, the federal agency provided more than \$3.7 million in direct assistance. The most common reasons FEMA denied assistance to homeowners included insufficient damage, the damage was insured, FEMA was unable to reach the applicant for inspection, or the applicant did not verify he or she lived in the home during the storm. (Stewart & Sweigart, Tracking the money: How millions in tornado assistance is being spent, 2019)

May 29, 2019, the Dayton Foundation created a Disaster Relief Fund to support recovery efforts. Since then, it has received roughly 3,400 gifts globally, totaling nearly \$1.8 million. The foundation spent about \$863,000 in the storms' immediate aftermath supporting group emergency efforts such as the St. Vincent de Paul homeless shelter and the Red Cross operations. The balance is allocated to support long-term disaster recovery efforts once all other funds have been exhausted.

Long-Term Recovery Efforts

The local Emergency Management Agency developed the Miami Valley Disaster Recovery Leadership Board to successfully guide and support Miami Valley's long-term recovery efforts over the next six to 10 years. The board will provide strategic leadership, oversight, and transparency for the community on these efforts. The board will also assist with fundraising, communications, and potential policy and protocol creation to aid the community in rebuilding and recovering post-disaster, as well as strengthening the community's future disaster recovery capacity.

The board has 17 voting members: 12 from local core institutions and five at-large community members. Miami Valley Regional Planning Commission (MVRPC) will provide staffing and administrative support to the board. The board will create and convene sub-groups, as necessary. Roughly 40 government and non-governmental agencies serve on the board or act as a strategic partner on the Miami Valley Recovery Leadership Board by:

Organization/Representing

- Miami Valley Regional Planning Commission
- The Dayton Foundation
- Dayton Business Committee
- Dayton Development Coalition
- Chamber of Commerce
- City-Wide
- Montgomery County
- Greene County
- Miami County
- City of Dayton

- GDAHA/Healthcare
- Sinclair Community College/Education
- Community Members

The following local, state and federal entities are strategic partners and organizations contributing to the Disaster Recovery project recovery efforts:

- State of Ohio (Ohio EMA, JobsOhio, Development Services Agency)
- Local Disaster Recovery Managers: critical to ensure all parties understand coordinating and executing strategic recovery plan/goals and have equal access and technical support necessary to pursue various resources. Participating local governments include:
 - Montgomery County
 - Greene County
 - Miami County
 - City of Dayton
 - City of Trotwood
 - City of Brookville
 - City of Clayton
 - City of Vandalia
 - Harrison Township
 - City of Beavercreek
 - Beavercreek Township
 - City of Union
- Local economic development organizations and Chambers of Commerce
- Dayton Development Coalition
- Dayton Area Chamber of Commerce
- Greene County Chamber of Commerce
- Long-term Disaster Recovery Individual Assistance/Operations Group: representatives from local nonprofit organizations focused on disaster recovery and resiliency for individuals
- State and federal elected officials: to provide updates on the region’s disaster recovery strategy and ensure communities have resources necessary to advocate for regional needs
- Federal agencies (EDA, FEMA, EPA, etc.): maximize and coordinate regional resources.

Miami Valley built a comprehensive, coordinated long-term disaster recovery system using the National Disaster Recovery Framework (NDRF) to serve all impacted counties. The NDRF provides guidance on recovery efforts by defining recommended roles, responsibilities, coordination and planning among all jurisdictions. Based on decades of disaster response best practices, it focuses on how to restore, redevelop and revitalize the community’s health, social, physical, economic, natural and environmental fabric and build resiliency for the future.

The Miami Valley Regional Planning Commission (MVRPC) leads the Long-Term Community Disaster Recovery Network, part of the established National Disaster Recovery Framework (NDRF) for the Miami Valley region. MVRPC is working with Ohio EMA, FEMA and government leadership of all impacted communities to coordinate applying for, distributing and reporting on disaster aid, hazard mitigation and resiliency planning funding from multiple federal and state sources.

Exhibit 1-20 Miami Valley Disaster Recovery Leadership Board

Coalition partners include [CareSource](#), [Huntington Bank](#), [KeyBank](#), [County Corp](#), [Rebuilding Together Dayton](#), [Habitat for Humanity of Greater Dayton](#) and the [Miami Valley Community Action Partnership](#). Homeowners in Greene, Miami and Montgomery counties who need home repairs may be eligible for grants of up to \$20,000 toward repairing their primary residence. Homeowners seeking repair assistance contact the Miami Valley Community Action Partnership, the coalition's single point of contact for those seeking repair assistance. Additionally, for residents who need assistance purchasing or constructing a new home, the DRP can provide existing qualified homeowners in the affected counties with grants of up to \$20,000 towards purchasing or constructing a new home. Renters in the affected counties may also be eligible for \$5,000 towards a home purchase.

As of June 1, 2020, Federal Home Loan Bank has approved 29 requests for assistance totaling \$368,000. 11 of those requests have been disbursed. To date, \$655,000 has been requested for acquisition and \$754,000 has been requested for rehabilitation of properties.

Community Recovery

The Miami Valley Regional Planning Commission (MVRPC) and the Long-Term Community Disaster Recovery Network Community lead recovery efforts. Under MVRPC's leadership, the Network consists of representatives from local jurisdictions, government agencies and community stakeholders. These partners work collaboratively on long-term recovery efforts focused on community rebuilding, economic recovery, infrastructure, urban planning and local policy. The recovery timeline for this group is five to 10 years. The Dayton Foundation committed some Disaster Relief funds toward longer-term community recovery for parks and infrastructure needs.

The Disaster Recovery project will have significant, long-term economic benefits to the Miami Valley region, especially since Opportunity Zones overlap disaster-impacted communities. The Community Long-Term Recovery's central focus is intentionally and strategically incorporating infrastructure enhancements, mitigation actions and inclusive, comprehensive planning in economic recovery decision making to build resiliency and preparedness for future natural disasters and unforeseen industry disruptions.

As a result of the tornadoes, serious concerns exist regarding workforce depletion, adverse impacts to industry and comprehensive mitigation and resiliency planning needs. Because of the vast devastation in disaster-impacted commercial corridors, there will be an intense focus led by the Disaster Recovery Manager to create a robust economic reuse and redevelopment strategy for the region. There are 17 Opportunity Zones that directly correspond to disaster-impacted areas. The Disaster Recovery Manager will focus on Opportunity Zone management, convening community stakeholders to develop an investment plan and identifying potential projects for each Opportunity Zone. The Disaster Recovery Manager will work with regional partners including the business community and economic development organizations to mitigate unemployment impacts and workforce challenges through job-skill development and training, industry diversification, business expansion, employment alternatives and synergy between retention and outside investment strategies.

The University of Dayton recently published "[Dayton's Darkest Summer: The Rise from Tragedy](#)". It illustrates the city's strength and resiliency as they recover.

Fair Housing

The State of Ohio conducted an Analysis of Impediments to Fair Housing Choice (AI) in 2015 to identify impediments to fair housing in non-entitlement areas of the state. Identified impediments and recommended actions are outlined in Exhibit 1-19.

In Ohio, the HUD-identified most impacted and distressed area resulting from the major disaster that occurred in 2019 is ZIP Code 45426, located in Montgomery County (85 FR 4681). Montgomery County, an entitlement jurisdiction, participated in a regional AI in 2015, entitled “Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering, OH”. In addition, Montgomery County participated in a 2016 – 2020 regional fair housing plan with the cities of Dayton and Kettering.

In administering its CDBG-DR award, the State of Ohio will affirmatively further fair housing and support Montgomery County’s ongoing fair housing efforts.

Exhibit 1-19¹ State of Ohio Fair Housing

Impediment	Tactics
<p>Lack of available affordable housing units for people with disabilities.</p> <p>An estimated 13% of Ohioans identify as having a disability, and almost 70% of discrimination complaints in non-entitlement communities are based on disability. This suggests that individuals with disabilities may face a disproportionate difficulty in accessing suitable housing.</p>	<ul style="list-style-type: none"> • In March 2015, HUD awarded Ohio \$11.9 million for a five-year rental assistance program intended to expand affordable housing opportunities for individuals with disabilities and is expected to assist 508 households. The Ohio Housing Finance Agency will partner with the Ohio Department of Medicaid, Ohio Department of Developmental Disabilities, and the Ohio Department of Mental Health and Addiction Services to create and maintain a referral network to match individuals with disabilities with housing units throughout the state. • The Ohio Department of Medicaid will use \$1 million annually from existing federal Money Follows the Person funds to increase the supply of housing for persons with disabilities living below 18% of the area’s Gross Median Income. The Ohio Department of Medicaid will partner with the Ohio Housing Finance Agency to provide five years’ worth of Project Based Rental Assistance to developers that increase the supply of Americans with Disabilities Act (ADA) accessible units in affordable housing developments from 10% (the current requirement to receive Low Income Housing Tax Credits) to 25% of total units. The purpose of the subsidy is to fill the gap between a 50-percent Low Income Housing Tax Credit unit rent and 30% of the tenant’s gross income. During the five-year pilot, the Ohio Department of Medicaid will work with the Office of Health Transformation to seek additional funding for this type of rental subsidy through other state agencies. • In response to the Olmstead decision, Ohio’s FY 2014 Consolidated Plan (p. 122-123) encourages universal design as an objective to meet the needs of the disabled by developing housing to serve those with developmental disabilities, severe and persistent mental illness or mobility/sensory impairments. • Provide specialized training to grantees to facilitate an understanding of basic universal design principles. Training should include regulatory information and design considerations. • Share the Analysis of Impediments with the Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee and educate the members on the identified impediments to ensure advocacy for disabled populations. • Link grantees with resources, agencies and organizations in the community that serve disabled residents. • Discuss with communities how zoning and building codes can address housing barriers for disabled residents.

¹ From: State of Ohio Analysis of Impediments (May 2015)

Impediment	Tactics
	<ul style="list-style-type: none"> • Encourage grantees and local and regional fair housing agencies to explore if testing studies in community are feasible. • Survey communities to determine general fair housing attitudes within Ohio.
<p>Lack of affordable, accessible housing for older adults.</p> <p>Ohio is facing a large older adult population over the next 25 years. By 2040, 19.9% will be 65 years of age or older. Furthermore, 35.9% of disabled individuals are currently aged 65 or older. This demographic transition will require addressing occupational and housing needs.</p>	<ul style="list-style-type: none"> • Link grantees with resources, agencies and organizations in the community that serve older adults. • Coordinate with the Ohio Department of Aging to ensure grantees work with local area agency on aging offices to secure housing choices and other resources for older adults. • Provide training to grantees to demonstrate how design principles can improve older adults' quality of life. • Share the Analysis of Impediments with the Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee and educate the members on the identified impediments to ensure advocacy for older adults. • Discuss with communities how zoning and building codes can address housing barriers for older adults, particularly those dealing with disabilities.
<p>Need for enhanced fair housing education and outreach to the Hispanic population, especially in the northern and northwestern part of Ohio.</p> <p>While no data currently exists that suggests the Hispanic population experiences disproportionate housing discrimination, this community, which has grown by 76% since 2000 and tripled since 1980, should be the focus of targeted fair housing education and outreach. It is imperative that counties with higher than average concentrations of Hispanic individuals, especially in the north and northwest sections of the state, have fair housing outreach materials available in Spanish.</p>	<ul style="list-style-type: none"> • Ensure that grantees that have a higher concentration of Hispanic individuals provide fair housing materials in Spanish. • Share the Analysis of Impediments with the Fair Housing advisory committee and ask members to advocate providing materials and training in Spanish. • Link grantees with resources, agencies and organizations in the community that serve Hispanic residents. • Offer specialized training that addresses impediments to fair housing for Hispanics at the OCD's annual training conference by 2020. • Encourage grantees to develop or strengthen relationships with the Ohio Civil Rights Commission (OCRC) to address discrimination in the community through services the Commission provides. • Ensure that grantees with a significant Hispanic population address impediments to fair housing for that population in their annual Analysis of Impediments submissions.

Impediment	Tactics
<p>Limited access to public transit in rural areas.</p> <p>The scarcity of public transit options in Ohio’s small cities and rural communities presents impediments to housing choice for those with disabilities, older adults, and individuals without personal automobiles. Access to transportation options in many cases may be the sole determination of where a family or individual is able to seek housing.</p>	<p>According to the Ohio Department of Transportation, Ohio’s 34 rural transit agencies spend about \$38 million a year to provide service. Although this is a small portion (about 4%) of the overall transit investment, rural services operate in 35 counties and provide more than 2 million trips annually.</p> <p>Approximately half of existing funding for rural agencies comes from the federal government. Many rural areas also raise funds by contracting with human service agencies and other partners. Local funds, passenger fares and state funds are also important resources for the rural agencies.</p> <p>There are about 550 vehicles in Ohio’s rural fleet. An estimated 150 buses and vans are past their useful life and need to be replaced in the immediate term.</p> <p>Rural areas also need more service. The analysis found a current need for an additional 1 million transit trips. By 2025, as Ohio’s rural population continues to grow older and rely more on public transit, the need for service will grow to more than 4 million trips each year.</p> <p>This estimate does not include the 27 Ohio counties that do not have any existing public transit service. These communities currently need roughly 2 million trips and are expected to need 3 million trips per year by 2025.</p> <p>The 2015 investment needs for rural communities include:</p> <ul style="list-style-type: none"> • <i>System Preservation</i> - \$22 million to replace vehicles already beyond their useful lives, and \$11 million to purchase vehicles expiring in 2015 and fund other infrastructure needs. • <i>System Expansion</i> - \$18 million to operate and \$11 million to purchase vehicles for additional service in areas that already have some transit. • <i>New Systems</i> - \$48 million for transit service in the 27 counties that currently have none. <p>Noted Benefits of Investing in Rural Transit:</p> <ul style="list-style-type: none"> • Ensure all Ohio residents have access to some public transportation. Expanding service to areas that currently do not have public transportation would reach an estimated 1 million individuals. • Provide access to jobs, job training, health care and basic personal services. Expanding mobility is important statewide, but especially for people living in Ohio’s small towns and rural communities and for employers needing a workforce that can

Impediment	Tactics
<p>Limited access to public transit in rural areas. (cont.)</p>	<p>get to work. Transportation needs in these areas are expected to increase as their populations grow older and poorer. Investing in services now will ensure the state has infrastructure in place to support individuals, Ohio businesses and health and human service programs.</p> <p>The Ohio Department of Transportation’s recommended short-term strategies to invest in rural transit to meet the needs of older adults, disabled, and low-income individuals and households include:</p> <ul style="list-style-type: none"> • Incentivize coordination between human service and public transportation. Grants may also support extending or providing service in counties where none exist. • Establish a cabinet-level Human Service Transportation Coordinating Committee to examine statewide policies to encourage coordinated transportation services. Largely aimed at rural counties and systems, this committee would include, at minimum, the Ohio Department of Job and Family Services, Ohio Department of Medicaid, Ohio Department of Aging, and Ohio Department of Transportation. • Establish a Blue Ribbon Funding Committee to identify and move forward a statewide dedicated public transportation funding source. This would benefit urbanized areas and also address significant rural transit needs.

Part 2: Estimating Unmet Needs

The need estimation is based upon data available at the time of this assessment. Ohio has not received damage estimates or data from FEMA, the Small Business Association or the Ohio Department of Insurance. This needs assessment reflects information received from the MVCAP, Montgomery County, and reputable online news sources. The assessment will be reevaluated and updated as more information is provided.

The Memorial Day 2019 tornadoes that hit Montgomery County largely impacted its housing stock, affecting all neighborhoods including affluent suburbs, rural communities and inner-city neighborhoods. The property damage assessment conducted by the Montgomery County Auditor's Office detailed more than 5,000 affected properties, mostly impacting the county's most vulnerable populations. Of that total, 52% were single family dwellings, 46% apartments, and 2% mobile homes. The community and long-term recovery board identified housing as the largest unmet need. Many victims of the Memorial Day tornadoes in Montgomery County are still believed to be living with relatives and couch-surfing.

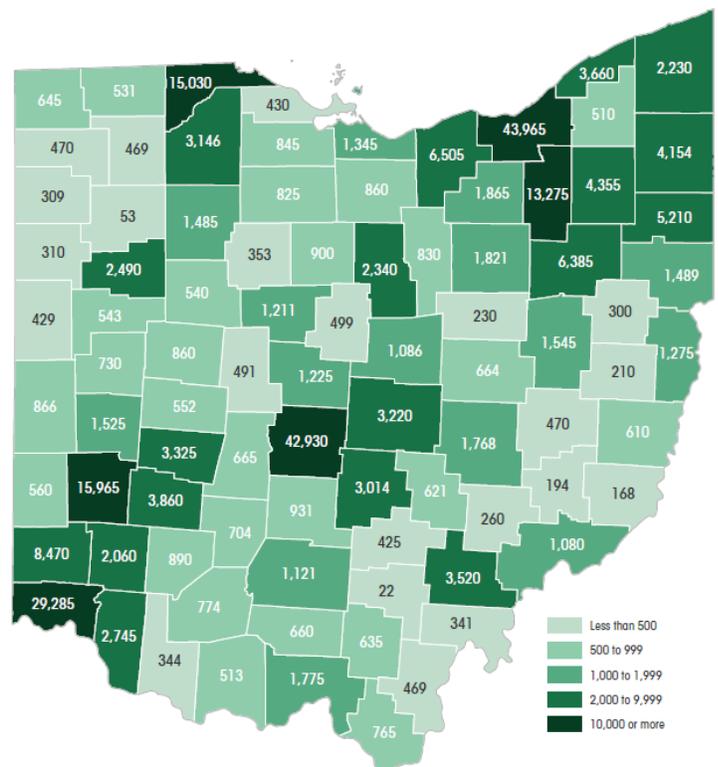
Housing

Prior to the disaster, the Ohio Housing Finance Agency (OHFA), as part of their annual housing needs assessment, calculated the affordable housing demand in Ohio by census tract. The assessment estimated that Montgomery County had 40,913 very-low income (VLI) renters, with only 29,839 affordable rental units available, an 11,074 shortage of available affordable rental units for the very-low income population.

Montgomery County has 281 active housing tax-credit-funded permanent supportive housing rentals, ranking third statewide. They are fifth in active non-housing tax credit OHFA-financed affordable rental units with 224 units. Montgomery County had 6,872 active HUD-subsidized rental units.

The core data on housing damage for the unmet housing needs calculation is based upon the Montgomery County Auditor's Damage Assessments. Data has not yet been obtained from FEMA's Individual Assistance program. HUD categorizes each FEMA-inspected unit into one of five categories:

Exhibit 2-1 Shortage of Rental Units Affordable and Available to Extremely Low-Income Renters by County



Source: 2010-2014 Comprehensive Housing Affordability Strategy data, Tables 148 and 15C
 Note: A rental unit is "affordable and available" if it is both affordable and vacant-for-rent or is occupied by a household with income at or below 30% AMI (i.e., "extremely low-income").

» The shortage of rental units affordable and available to extremely low-income renters exists in all 88 counties statewide and is at least 100 units short in 86 of them.

Exhibit 2-2 HUD Damage Categories	
Category	FEMA inspected real property damage
Minor-Low	< \$3,000
Minor-High	\$3,000 - \$7,999

Major-Low	\$8,000 - \$14,999 and/or 1 to 4 feet of flooding on the first floor;
Major-High	\$15,000 - \$28,800 and/or 4 to 6 feet of flooding on the first floor.
Severe	> \$28,800 or determined destroyed and/or 6 or more feet of flooding on the first floor.

The average cost to fully repair a home to code for a specific disaster within each of the damage categories noted above are calculated using the multipliers provided by HUD for Ohio (see in the exhibit below). The multipliers use the median real property damage repair costs determined by the Small Business Administration for its disaster loan program. By multiplying the number of units by the multipliers, the housing unmet needs was calculated.

Exhibit 2-3 HUD 2019 Serious Housing Unmet Needs (Data from 11-15-2019)			
Grantee	Ohio	Disaster Type	Severe Storms/Tornadoes/ Flood/Wind/Landslides/Mudslides
Disaster Number	4447	Serious Unmet Housing Need Estimate Most Impacted Area	\$4,713,745
Total Any Damage	710	County Most Impacted Areas	0
Total Serious Damage	256	Zip Code Most Impacted Areas	1
Owner Serious Unmet	3	Total Most Impacted Areas	(No less than \$9,844,000) Zip Code: 45426 (Montgomery)
Renter Serious Unmet	133	Ohio Serious Unmet Housing Need Multipliers	
Total Serious Unmet	136	Major-low	\$21,666
		Major-High	\$37,804
		Serve	\$38,965

However, based upon the Montgomery County Auditor's property assessments of the HUD-identified Most Impacted and Distressed Area (MID) the impact to housing greatly exceeded original estimates. HUD identified 710 units with damage and 256 units severely impacted, however, the Auditor's Office identified 1,027 units destroyed and two additional inaccessible/condemned.

Exhibit 2-4 Montgomery County Damage Categories		
FEMA	County Auditor's Code	Degree of damage to impacted residences
Minor-Low	Affected: 2-Shingle Damage	Some shingle and/ or Tree Damage, but still habitable
Minor-High	Affected: 3- Roof Damage	Some roof damage and Tree Damage, but still habitable
Major-Low	Minor Damage: 4- Minor	Home is damaged and uninhabitable, but may be made habitable in short period of time with repairs
Major-High	Major Damage: 5-Major	Substantial failure to structural elements of residence (e.g., walls, floors, foundation), or damage that will take more than 30 days to repair
Severe	Destroyed: 6-Destroyed	Total loss of structure, structure is not economically feasible to repair, or complete failure to major structural components (e.g., collapse of basement walls/foundation, walls or roof)

Exhibit 2-5 Montgomery County MID Property Assessment After the Storm						
MC Auditor Rating	Affected	Destroyed	Inaccessible	Major	Minor	Grand Total
FEMA Category	Minor-Low & High	Severe	Severe	Major-High	Major-Low	
Harrison Township						
Apartment	9	292		138	285	724

Mobile Home/Trailer	70	12		6	12	100
Single Family Dwelling	298	44	1	150	268	761
Subtotal	377	348	1	294	565	1585
Trotwood						
Apartment	120	629		251	105	1105
Single Family Dwelling	223	50	1	159	298	731
Subtotal	343	679	1	410	403	1836
Grand Total for MID	720	1027	2	704	968	3421
Grand Total for County	1791	1177	8	1060	1627	5663

Based upon HUD's provided housing multiplier, the total estimated housing impact on Montgomery County is \$126,869,347 as detailed in Exhibit 2-6.

Exhibit 2-6 Montgomery County Property Assessment Impact			
Category	Ohio Housing Multiplier	Total County Properties Assessed in Category	Total Estimated Impact
Minor	\$3,000*	1791	\$5,373,000
Major-low	\$21,666	1627	\$35,250,582
Major-High	\$37,804	1060	\$40,072,240
Serve	\$38,965	1185	\$46,173,525
Total Impact			\$126,869,347

*\$3,000 is an estimate average cost based on FEMA's property damage range for this category.

Six months after the tornados, the Montgomery County Auditor's Office inspected units deemed Category 5 (Major Damage) or 6 (Destroyed) after the initial inspections. Of the original 1,177 original properties deemed 'Destroyed' (MC Auditor 6-Destroyed), 155 remain destroyed and/or untouched, with an additional 33 properties inaccessible. This does not provide a total count of housing units. One apartment property consisting over several buildings in Harrison Township has approximately 400 units that were destroyed and inaccessible. Nearly 70%, 729, of the originally accessed 1,060 properties which had major-high (MC Auditor 5-Major) continue to have major property damage.

Exhibit 2-7 Montgomery County Property Assessment Updated January 2020				
MC Auditor Rating	Destroyed	Inaccessible	Major	Grand Total
FEMA Category	Severe	Severe	Major-High	
Brookville	18		61	79
Butler Township	4		50	54
Clayton	3		12	15
Dayton	31		124	155

Englewood	0		2	2
Harrison Township	63	33	275	371
Perry Township	5		20	25
Riverside	1		1	2
Trotwood	25		178	203
Vandalia	3		6	9
Grand Total for MID	88	33	453	574
Grand Total for County	153	33	729	915

According to the FEMA-4447-OH Preliminary Assessment Report, 62.3% of the affected residents were insured, and 14.9% of the affected residents were poverty households. Presumably, the properties in Exhibit 2-7 have not received insurance payments, were under insured or did not receive FEMA assistance since over six months after the disaster no improvements have been made. Based upon the HUD serious unmet need housing multiplier, the unmet serious housing need for the MID area is \$21,839,977 and \$34,845,571 for Montgomery County as shown in Exhibit 2-8 below.

Exhibit 2-8 Calculated Unmet Housing Need as of January 2020				
MC Auditor Rating	Destroyed	Inaccessible	Major	Grand Total
HUD Multiplier	\$38,965	\$38,965	\$37,804	
Grand Total for MID	88	33	453	574
MID Unmet Need	\$3,428,920	\$1,285,845	\$17,125,212	\$21,839,977
Grand Total for County	153	34	729	916
County Unmet Need	\$5,961,645	\$1,324,810	\$27,559,116	\$34,845,571

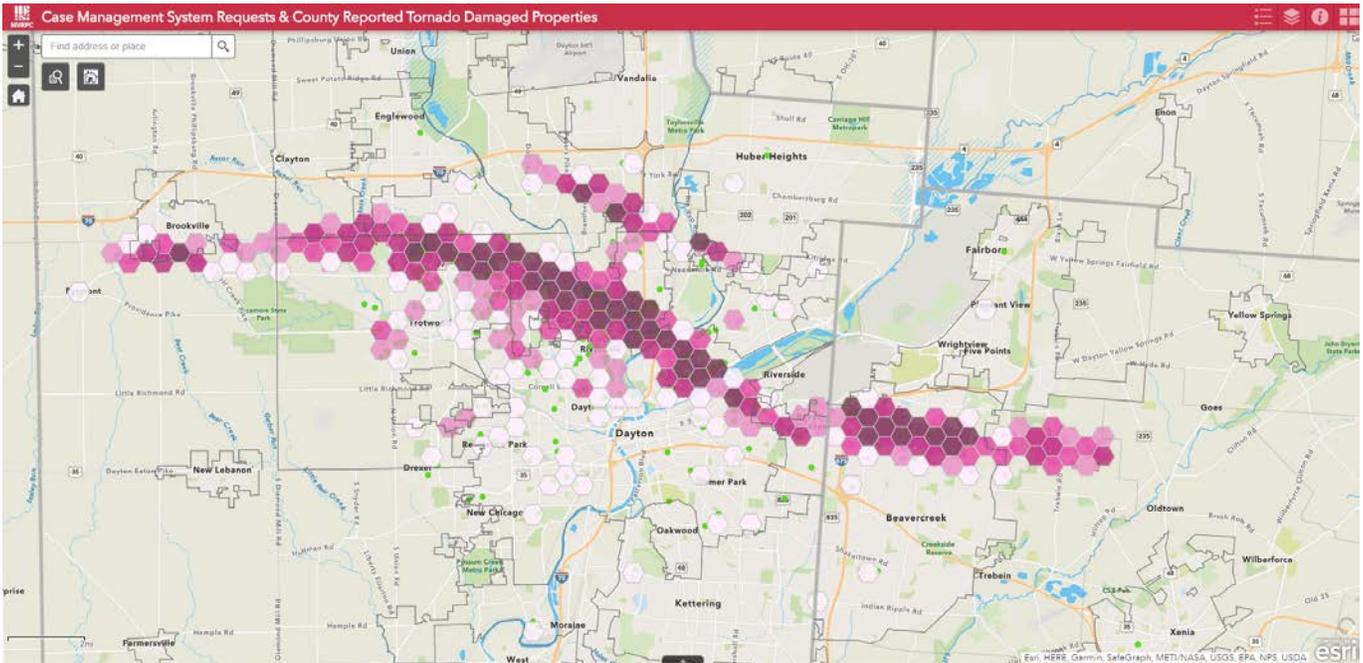
Estimated Unmet Housing Need
\$34,845,571

As of June 1, 2020, the MVLTRG reports the following disaster case management updates.

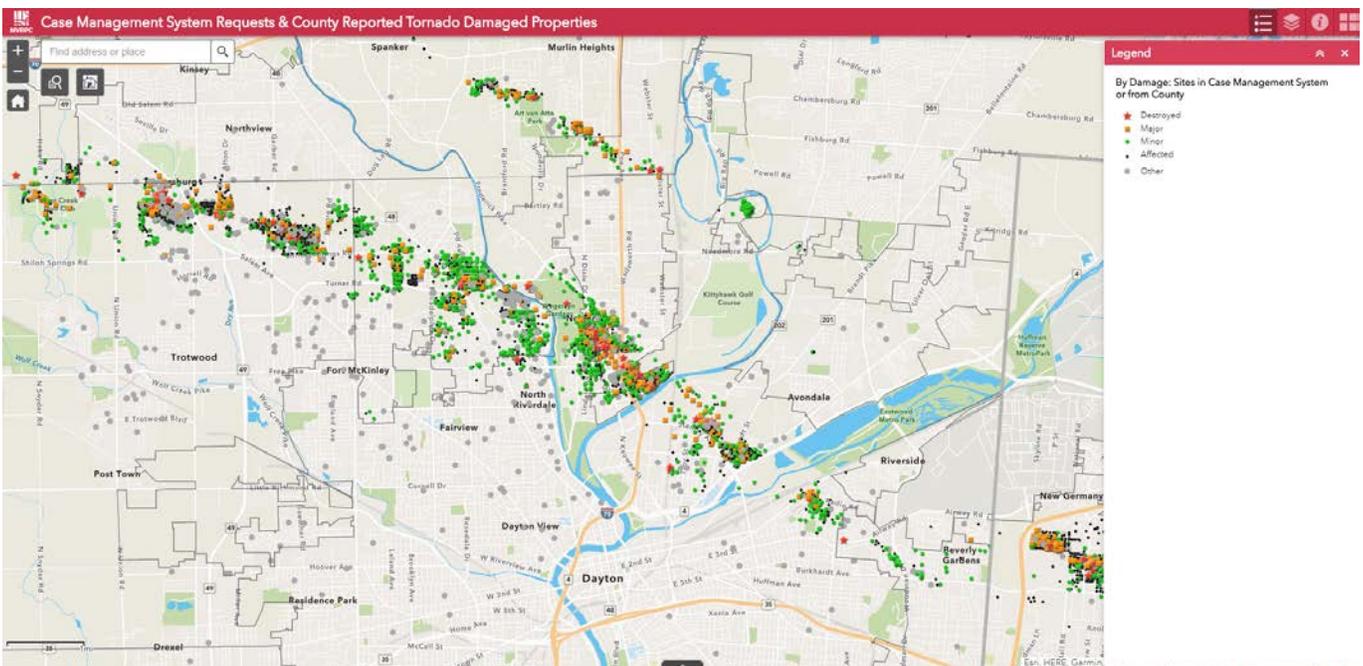
- 854 calls to *211; 493 have been 'closed' and 361 remain 'open' waiting assistance
- Household Characteristics of Open cases:
 - 43% have children under 18
 - 27% have members over age 60
 - 52% are homeowners; 44% renters and 4% other
- Top Requests for assistance include household appliances, repair/reconstruction, rental deposit and utility assistance, food assistance, and assistance with FEMA and other benefit access.
- 444 homeowners have applied for assistance
 - 68% indicated they need help with repair/rebuild
 - 52% of the 444 homeowners indicated they are insured. However, many "insured" survivors are encountering challenges that are impacting their ability to recover and will require MVLTRG assistance to repair/rebuild.
 - 34% are underinsured

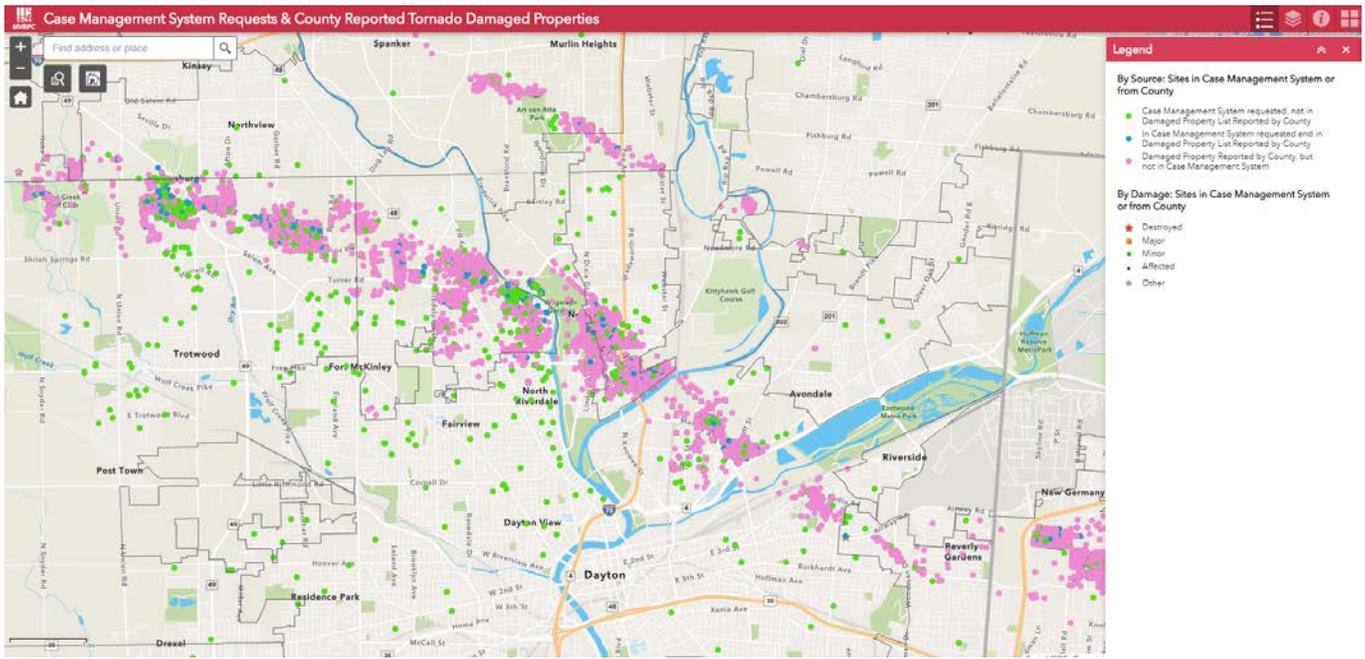
- 14% are uninsured

This map shows a database of locations compiled from the Case Management System (acquired in February 2020 and updated through April 21, 2020) and county sources (Greene, Miami, and Montgomery; acquired in 2019). The origin of the data for the county sources are typically the Auditor's Office and the county EMA office. All information is associated with damage wrought by the tornadoes of May 2019.



Prepared by [MVRPC](#), April 2020. App revision May 2020. The darkest pink dots are areas with properties with damage and are still in the case management system.





Business

According to summary data from the Disaster Recovery Walk in the MID area, 585 commercial properties were targeted, and 418 were touched by the tornadoes. Twenty-six percent of businesses did not have to close; however, 71% closed temporarily, and 3% remain closed. Only 20% of businesses were affected (ex. lost shingles), 24% experienced minor damage, and 11% major damage. The main type of businesses affected were services, retail, manufacturing, and restaurants. A total of 220 people were unemployed as a result of the damage. The total estimated financial impact encompassed costs associated with structural, foundations, inventory, products, equipment and assets, sales, revenue and other costs. In total, the financial impact exceeded \$8.6 million.

The Ohio Small Business Administration indicated no businesses applied for assistance. Many businesses had insurance to cover losses or the business was a total loss.

Exhibit 2-8: HUD 2019 Disasters- Serious Unmet Business Needs (Data from 11-15-2019)			
Grantee	Ohio	Disaster Type	Severe Storms/Tornadoes/ Flood/Wind/Landslides/Mudslides
Disaster Number	4447	Multiplier for pre-inspection denial due to credit or income	1.97
Estimated Applicants with Serious Unmet Needs (Inspected and Uninspected)	45	Estimated Serious Unmet Business Needs	\$6,430,222
Applicants Inspected with serious damage and denied or still in processing	23		

Estimated Unmet Business Need \$0

Infrastructure

While some infrastructure sustained damages, local communities identified other sources to assist in addressing immediate damages. The City of Dayton applied for funding in December of 2019 for water pumps.

To calculate unmet needs for infrastructure projects, Development used data provided by the Governor's Office for the initial June 18, 2019 declaration showing the amount needed to repair the permanent public infrastructure (Categories C to G) to their pre-tornado condition.

Public assistance is provided to state, tribal, and local governments and certain private nonprofit organizations for emergency work and repairing or replacing disaster-damaged facilities, which may include the following Categories:

- A – Debris removal
- B – Emergency protective measures
- C – Roads and bridges
- D – Water control facilities
- E – Buildings and equipment
- F – Utilities
- G – Parks, recreational, and other facilities

Exhibit 2-9 HUD 2019 Disasters-Infrastructure Need (Data from November 15, 2019)			
Grantee	Ohio	Disaster Type	Severe Storms/Tornadoes/ Flood/Wind/Landslides/Mudslides
Disaster Number	4447	Federal Share Percent	75%
Category C to G FEMA PA Estimate			\$4,642,696
Federal Share			\$ 3,482,022
Local Share (Unmet Need)			\$1,160,674

Exhibit 2-10 FEMA Financial Assistance Data (4-17-2020)

Financial Assistance	
Individual Assistance - Dollars Approved	Public Assistance - Dollars Approved
\$4,895,097.15	\$3,702,466.32
Total Individual & Households Program (IHP) - Dollars Approved*	Total Public Assistance Grants (PA) - Dollars Obligated†
\$3,555,042.96	\$2,407,440.03
Total Housing Assistance (HA) - Dollars Approved*	Emergency Work (Categories A-B) - Dollars Obligated†
\$1,340,054.19	\$62,777.76
Total Other Needs Assistance (ONA) - Dollars Approved*	Permanent Work (Categories C-G) - Dollars Obligated†
1,640	
Total Individual Assistance (IA) - Applications Approved*	
* Dollars Approved: Assistance dollars approved but not necessarily disbursed.	
† Dollars Obligated: Funds made available to the State via electronic transfer following FEMA's final review and approval of Public Assistance projects.	

According to FEMA data (FEMA, 2020), only \$62,777.76 has been obligated by FEMA toward the \$4,642,696 estimated need in Categories C to G. However, \$2,407,440 has been obligated to assist with emergency work in Categories A and B. With the information available, Development will adopt HUD's \$1,160,674 estimate as the unmet infrastructure need.

As of June 1, 2020, OEMA public assistance has had 42 applicants. FEMA has awarded over \$7 million. They continue to process projects and request payments be sent to applicants as projects are awarded by FEMA.

Estimated Unmet Infrastructure Need
\$1,160,674

Part 3: Determining Capacity

According to HUD's *Guide for Review of Financial Management of CDBG-DR Grantees*, each grantee must submit Risk Analysis Documentation to demonstrate that it has proficient controls, procedures, and management capacity in place. This includes the grantee's ability to prevent duplication of benefits as defined by Section 312 of the Stafford Act. Additionally, the grantee must demonstrate it can effectively manage the funds, ensure timely fund expenditures, maintain a comprehensive website regarding all disaster recovery activities assisted with these funds, and ensure timely communication to applicants regarding application status for disaster recovery assistance. Finally, the grantee must demonstrate that it has adequate policies and procedures to detect and prevent fraud, waste and abuse.

Accountability

Development will act as the principal agency responsible for the award. Development is a cabinet-level agency whose Director reports to the Governor. Development's Office of Community Development (OCD) will implement CDBG-DR award. OCD is the business unit that administers HUD's grant programs for the state, including the Community Development Block Grant, HOME Investment Partnership, Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS Programs and the National Housing Trust Fund. In Program Year 2019, OCD administered a total of over 81 million dollars in HUD-granted funds.

Preliminary Program Design

The OCD is developing a Method of Distribution (MOD) based action plan for this grant that will focus primarily on the affordable rental housing shortage in the City of Trotwood, Harrison Township, and the Wright View, DeWeese Ridgecrest, and Old North Dayton neighborhoods in Dayton, the areas most impacted areas by the storms. The Ohio Housing Finance Agency (OHFA), a state agency and long-time affordable rental housing development partner will be partnering on implementing the program and acting as a subgrantee.

In addition, OCD may allocate a portion of the CDBG-DR for single-family home repair and rehabilitation resulting from the tornadoes. The activity scope will be countywide with the scale to be determined based upon local recovery success and repair efforts currently in progress. Montgomery County would act as the subgrantee for this activity and partner with local providers for implementation.

Application Process

Upon executing the CDBG-DR grant agreement, OCD will publish a Notice of Funding Availability (NOFA) at https://development.ohio.gov/cs/cs_cdbg-dr.htm. The NOFA will also be distributed to eligible subgrantees via email.

OCD will utilize its existing online application and grants management system, OCEAN, for subgrantee application submittal. OCEAN provides 24/7 access to application status in addition to email notifications when an application status changes. When OCD makes a final funding determination it will inform the applicant via letter, email, and phone call.

As a MOD implementation, OCD's application will not include submitting individual applicant information. All data requested and submitted will be aggregate community-level data. The Disaster Recovery Program Manager will have overall responsibility for managing the application process with support from the Grants Operation Manager, Deputy Chief, and staff.

Capacity Assessment & Technical Assistance

On an annual basis, OCD administers up to \$80 million in HUD funding through various programs, primarily in housing. OCD-administered HUD programs are generally considered to be run effectively and efficiently, meeting all requirements for timeliness of commitments and expenditure ratios. There are no outstanding monitoring findings and HUD generally considers Ohio a low-risk grantee. OCD also has a history of successfully integrating supplemental or new funding sources into its portfolio without decreasing performance as evidenced by implementing the three Neighborhood Stabilization Program grants as well as the seamlessly integrating National Housing Trust Fund dollars.

The MOD OCD is currently developing for the CDBG-DR implementation will utilize the existing Housing Development Assistance Program for multi-family development in partnership with OHFA. Utilizing the existing program structure and associated systems will minimize the impact of the influx of funds and enable the state to efficiently deploy resources. OHFA is fully committed to providing the necessary resources to implement the program as a subgrantee. In addition, OCD has multiple existing programs that focus on single-family home repair and rehabilitation and will be able to quickly create a program to address storm damage-related home repair and rehabilitation in partnership with Montgomery County. OCD staff will be fully engaged in HUD CDBG-DR training opportunities including participating in the August CDBG-DR workshop in Chicago, attending DRGR training when available, and attending any additional related trainings when applicable. Staff is also experienced in interpreting and applying requirements as outlined in Federal Register Notices and HUD policies and guidance. As the program moves from planning to implementation, OCD will identify areas of opportunity to engage HUD technical assistance providers to address unique challenges that arise.

Staffing Assessment

OCD's staffing model will be flexible to accommodate the needs associated with program development. As the programs launch, OCD will make the appropriate adjustments to accommodate the workload. The agency organizational chart, Exhibit 3-1, provides a visual representation of the various functions associated with the program activities undertaken with the CDBG-DR funds. Key staff members have prior experience with the HUD-funded CDBG annual program.

Case management

Case management will be limited to implementing the home repair/rehabilitation program. This will be managed by the subgrantee and OCD will evaluate the case management plan assessment and evaluation during program application review. Based upon the region's current recovery efforts, case management will likely be coordinated with the United Way/211 system, which currently manages overall case management in the region. OCD will provide funding for training and technical assistance to the grantee and case management providers.

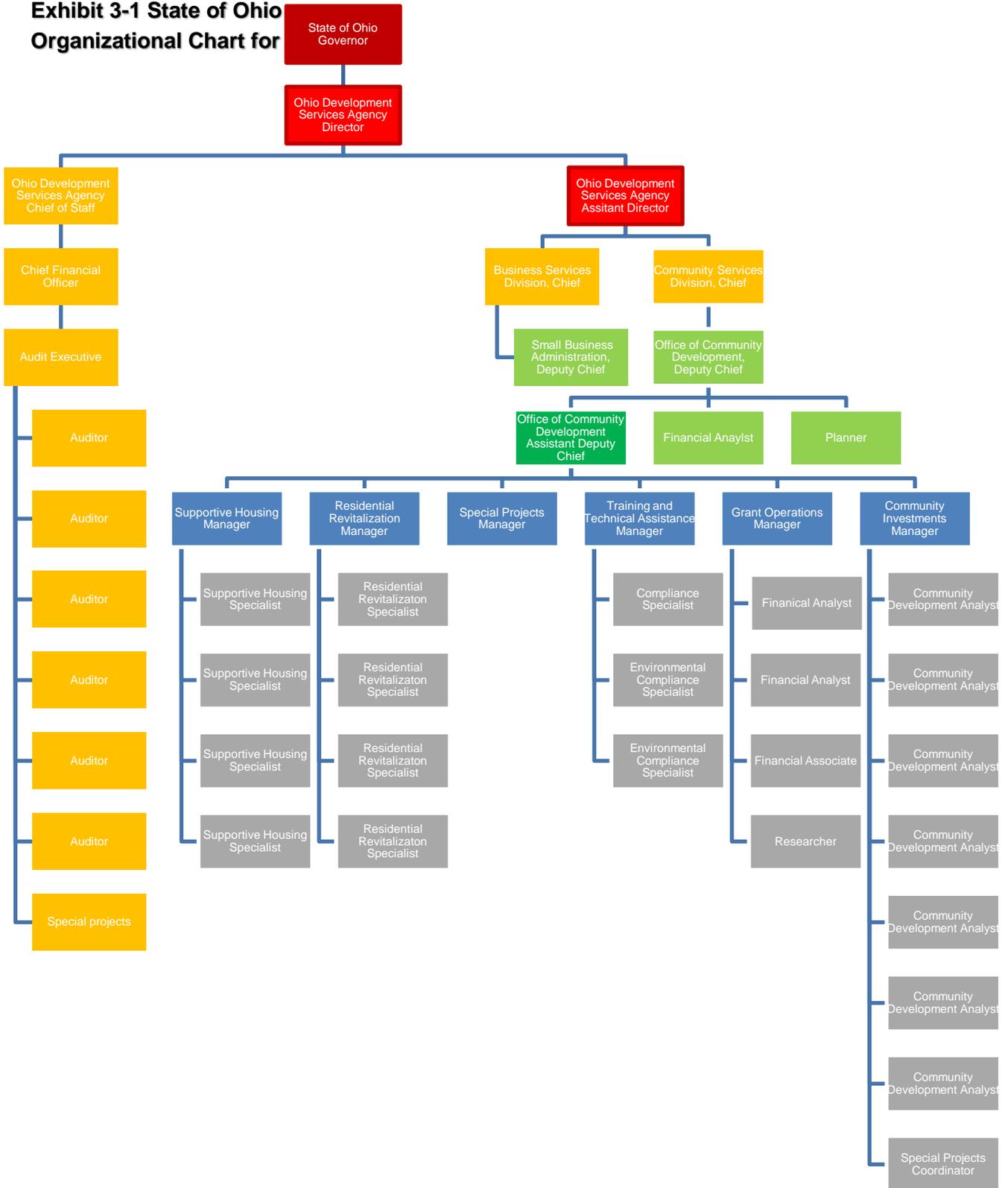
Program management (In-Place)

Overall responsibility of the CDBG-DR grant is with OCD's Deputy Chief. The Residential Revitalization Manager will supervise program implementation. The Residential Revitalization Manager is the program manager for OCD-administered HUD housing programs and as the CDBG-DR award is primarily focused on housing, it is appropriate that the Residential Revitalization Manager is the lead. The Residential Revitalization Manager will be supported by the Community Investments Manager in areas where recovery efforts include economic revitalization and infrastructure development. The Community Investments Manager is the program manager for OCD's economic development and infrastructure programs funded through HUD.

Staffing (3 In-Place, 2 hire)

As this will be primarily a housing program, OCD is dedicating an existing Residential Revitalization Specialist to support the program up to full-time depending on need. Currently, State of Ohio agencies are under a hiring freeze due to the coronavirus pandemic. However, once approved, OCD will post an additional Residential Revitalization Specialist position to back-fill for the position that will support the CDBG-DR implementation. Additionally, existing Residential Revitalization and Community Investments staff will be available to support the CDBG-DR implementation as needed.

**Exhibit 3-1 State of Ohio
Organizational Chart for**



Procurement/Contract Management (In-Place)

The OCD Training & Technical Assistance Manager is responsible for developing and implementing the Procurement Policy for all OCD-administered HUD programs, including the CDBG-DR allocation.

Environmental Compliance (In-Place)

The OCD Training & Technical Assistance Manager, assisted by the Environmental Compliance Specialist, is responsible for environmental compliance for all OCD-administered HUD programs, including the CDBG-DR allocation.

Section 3 and FHEO (In-Place)

The OCD Training and Technical Assistance Manager, assisted by the Compliance Specialist, is responsible for Section 3 reporting and fair housing compliance for all OCD-administered HUD programs, including the CDBG-DR allocation.

Monitoring

OCD anticipates two subgrantees for the CDBG-DR and will monitor those two grants with a combination of staff identified in sections described above.

Financial Management (In-Place)

Three primary business units will implement the financial components of the CDBG-DR grant. The Accounting Manager and staff will manage overall accounting and cash management. OCD's Budget Officer, who reports to Development's Chief Financial Officer, will manage budgets within the OAKS state accounting system, verify vouchers, and manage administrative funds. All other grant-level financial management including grantee request for payments, financial status reporting, and DRGR will be managed by OCD's Grant Operations Manager and staff.

Independent Audit Staff (In-Place)

Development's Audit Office includes six auditors in addition to the Special Project Coordinator and Audit Executive. The Audit Executive reports Development's Chief Financial Officer and Chief of Staff to the Agency Director. Existing audit resources will be sufficient to provide internal audit oversight for the two subgrantees.

Internal and Interagency Coordination

Interagency Communication

OCD has systems and processes in place to ensure effective communication between different departments and the division implementing CDBG-DR activities. Currently, OCD manages over \$80 million annually in HUD programs for the state. OCD managers meet weekly to discuss all programs in the OCD portfolio.

Communication between OCD and Subrecipients

OCD met with local officials and representatives from the Miami Valley Long Term Disaster Recovery Board to ensure planning is consistent with local and regional planning efforts. OCD anticipates two CDBG-DR Program subrecipients. Typically, OCD subrecipients are required to report every six months. However, since CDBG-DR is a new program, OCD staff will communicate regularly with subrecipients to assess progress and provide technical assistance.

Part 4: Prioritizing Needs

Prior to the Memorial Day tornadoes, affordable housing was a major need for Montgomery County. While businesses and infrastructure were impacted, housing had the largest impact and remains the primary need.

The estimated impact from the tornado is a combined \$142,519,483 across the housing, economy, and infrastructure sectors. The figure is calculated on best available data and may be adjusted as additional data becomes available. After considering funds already available through insurance payments and state and federal assistance, the remaining overall unmet need is approximately \$36,006,245 for all three categories. The \$12,305,000 federal allocation allow the state to address approximately 34% of the overall unmet need.

Exhibit 4-1 Total Storm Impact					
HUD Category	Estimated Impact		Unmet Need		Grand Total
Housing	\$ 126,869,347	89.0%	\$ 34,845,571	96.8%	\$ 161,714,918
Business	\$ 8,600,000	6.0%	\$ -	0.0%	\$ 8,600,000
Infrastructure	\$ 7,050,136	4.9%	\$ 1,160,674	3.2%	\$ 8,210,810
Total	\$ 142,519,483	100.0%	\$ 36,006,245	100.0%	\$ 178,525,728

When examining the relative need by sector, housing represents the greatest need with \$34,845,571 (96.8% of total) in unmet need, followed by infrastructure with \$1,160,674 (3.2% of total) in unmet need. The economic sector did not have any unmet needs.

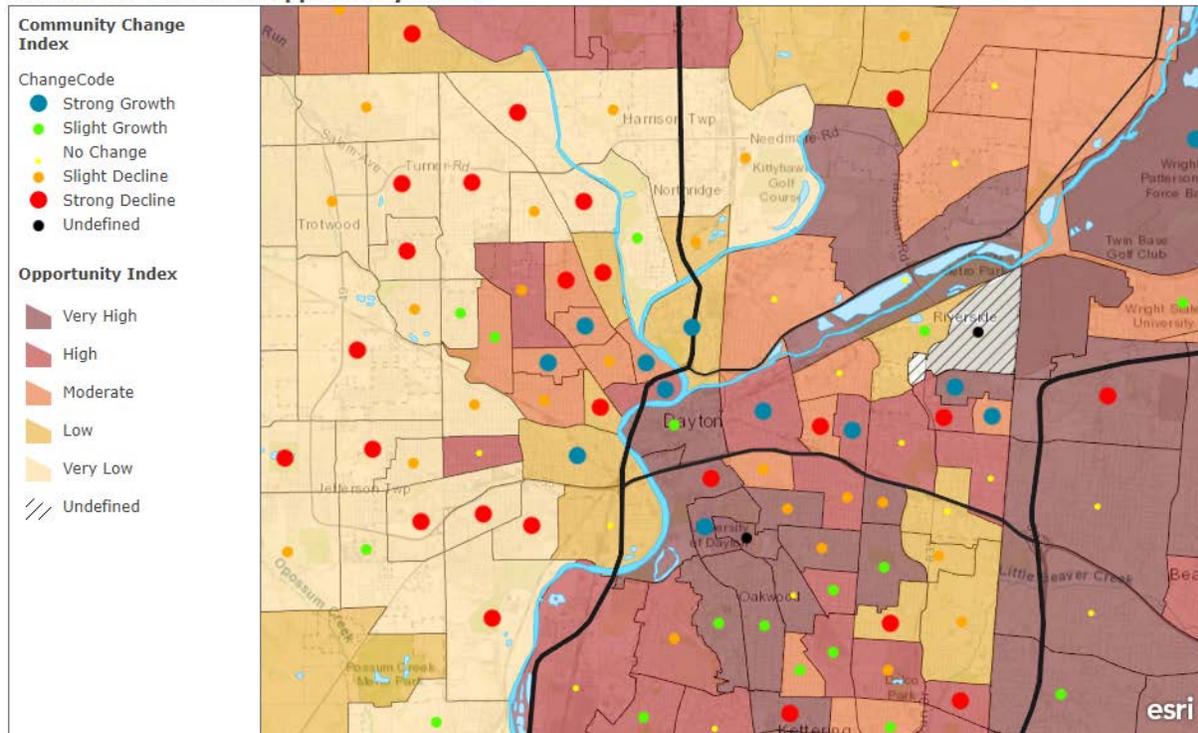
Federal Register notice 83 FR 40314 allows grantees to propose a funding allocation that includes unmet economic revitalization and infrastructure needs that are unrelated to unmet housing needs after the grantee demonstrates in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other funding sources. At this time, it is evident there is a significant unmet housing need and the primary focus will be to address the unmet housing needs with this CDBG-DR funding.

OCD seeks to assist those with unmet housing needs by offering a Multi-family Rental Program and a Homeowner Rehabilitation and Repair Program. These programs will be discussed in detail in Part 5, Method of Distribution.

The Ohio Housing Finance Agency (OHFA) and the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University collaborated to develop a mapping tool to support affordable housing development for households and families and to advance the state's Annual Plan goals, including promoting strategies that advance and promote compliance with the Fair Housing Act. The Opportunity index utilizes several indicators to identify the many dimensions of strong, vibrant and healthy communities and will be used to identify areas of opportunity, particularly regarding siting family housing in Ohio. The Kirwan Institute defines opportunity as a set of conditions that place people in positions to be more likely to succeed or excel. Opportunity is not something that an individual can possess, rather, it is something that a person can experience. All people want access to economic and social opportunity. Analyzing differences in access to opportunity structures is in alignment with state and federal initiatives to further Fair Housing, deconcentrate poverty and maximize equitable outcomes for low-income households.

OHFA 2018-2019 USR Opportunity Index

Exhibit 4-2

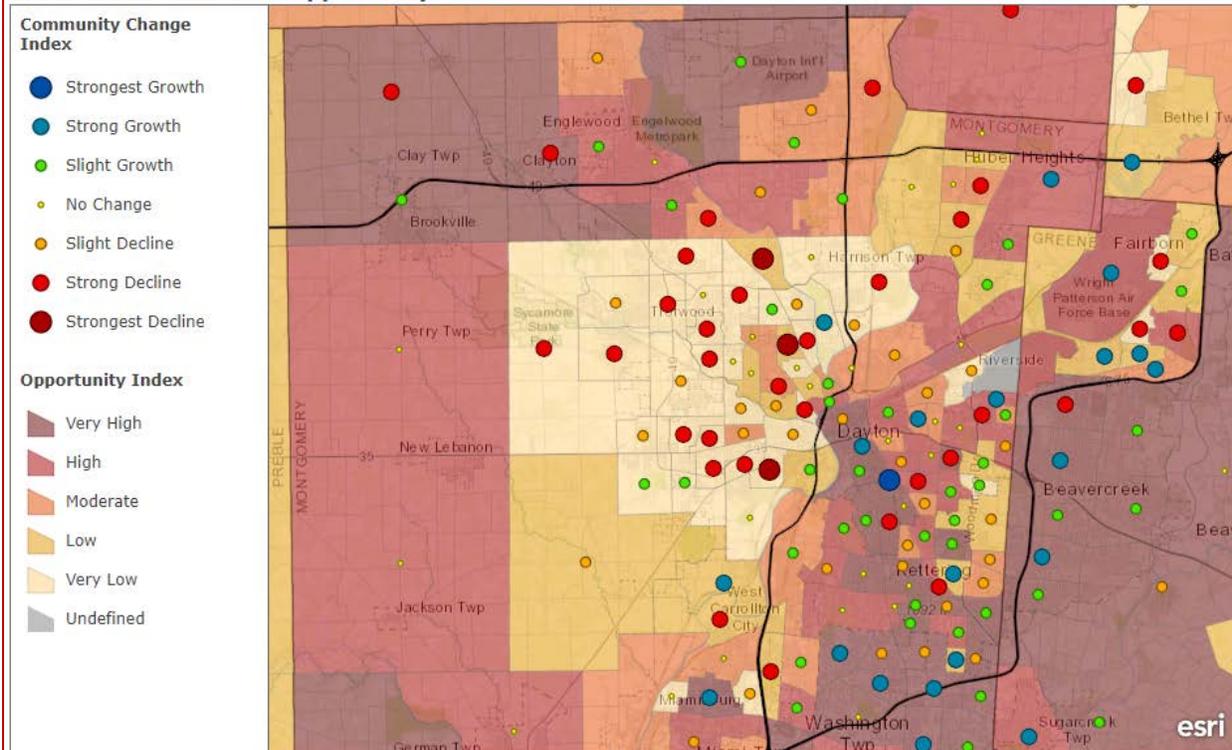


The 2018-2019 USR Opportunity Index is a new data tool developed by the Ohio Housing Finance Agency and The Kirwan Institute for the Study of Race and Ethnicity to aid developers and advocates in the placement of low income housing.

County of Montgomery, OH, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | source: National Hydrography Dataset - USGS | Sources: Esri, Bureau of Transportation Statistics, GeoSystems Global Corporation in association with National Geographic Maps and Melcher Media, Inc.

OHFA 2020 - 2021 USR Opportunity Index

Exhibit 4-3



County of Montgomery, OH, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

Because opportunity is a set of conditions that people experience, housing and neighborhoods are at the forefront of most people’s minds when considering relocation in opportunity-rich communities. Ohioans seeking social opportunity want meaningful human connections, access to education, and a stable social network. Ohioans seeking economic opportunity want access to living wage jobs, a strong housing market, and desire to benefit from national economic growth. The American Dream combines the concepts of economic and social opportunity by describing an American culture that both is equitable and fair; stable and inclusive. By clearly defining opportunity as access to both social and economic structures that create a set of conditions placing people in positions to be more likely to succeed or excel, we can see why opportunity matters to all Ohioans. (Sweeney, Outrich, Forcone, & Kenitzer, 2019)

The Trotwood, Harrison Township and Northwest Dayton areas show the very lowest opportunity index for Ohioans. The 2018-2019 Opportunity Index was higher in some of the areas, however following the 2019 tornados, the Opportunity index decreased where it could, and the Community Change index declined from 2018 to 2021.

When the President of the United States issued the emergency declaration for Ohio, 12 counties were designated for Federal Emergency Management Agency (FEMA) assistance. Public assistance grants were provided by FEMA to governmental units for emergency repairs and debris removal and individual assistance grants provided emergency funding to individuals to fulfill immediate housing and safety needs. Three counties received public and individual assistance, eight counties received individual assistance only, and one county received public assistance only.

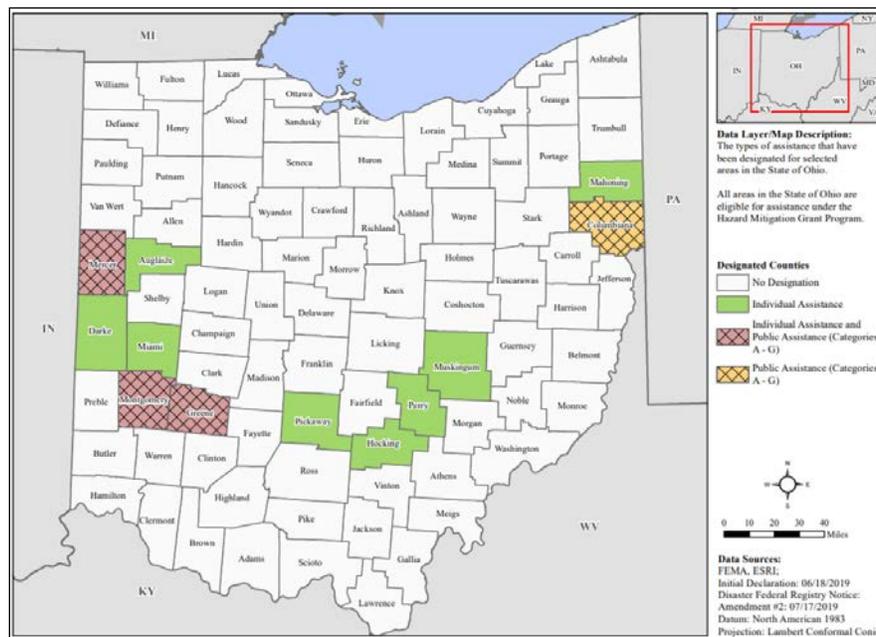


Exhibit 4-4. - Ohio –Severe Storms, Straight-line Winds, Tornadoes, Flooding, and Landslides FEMA-4447-DR Declared on June 18, 2019, President Trump declared that a major disaster exists in the State of Ohio. This declaration made Individual Assistance requested by Governor DeWine available to affected individuals and households in Auglaize, Darke, Greene, Hocking, Mercer, Miami, Montgomery, Muskingum, Perry, and Pickaway Counties.

Despite Montgomery County being declared eligible for FEMA Individual Assistance, many people were left with their housing needs unmet. This section will detail the priorities for funding allocation and explain the justifications for creating the programs to assist those in need.

Priorities for Funding Allocation

HUD provided the state with \$12,305,000 in disaster recovery funds for unmet needs to assist in recovery efforts from the 2019 Memorial Day tornadoes. CDBG-DR funds will be used for necessary expenses related to long-term recovery and restoration and revitalization within the impacted and distressed areas resulting from the tornado disasters as declared in DR-4447. To prioritize limited funding in areas with the highest damage, HUD identified one ZIP code as the “most impacted and distressed” (MID) area and required that a minimum of 80% of the allocation must address unmet needs within ZIP code 45426, the City of Trotwood; However, that may be expanded to include the balance of Montgomery County. The remaining 20% of CDBG-DR funding will also be allocated to the MID area to further assist recovery efforts in the hardest-hit area.

Exhibit 4-5 MID Zip Code- 45426

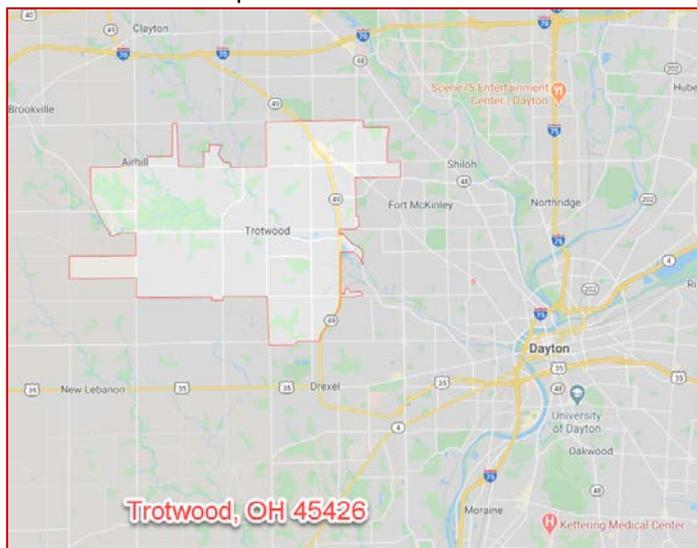
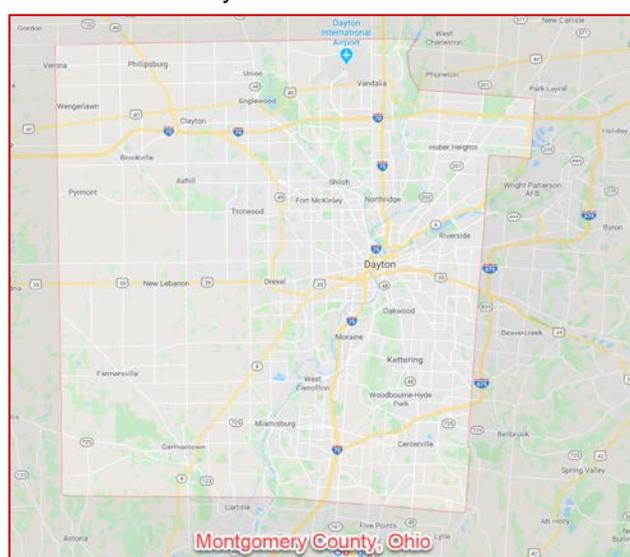


Exhibit 4-6 County-wide Service Area



Federal Register notice 83 FR 40314 allows grantees to propose an allocation of funds that includes unmet economic revitalization and infrastructure needs that are unrelated to unmet housing needs after the grantee demonstrates in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other funding sources. As of August 2020, it is evident there is a significant unmet housing need and therefore the primary focus will be to address some of those needs with this CDBG-DR funding.

OCD seeks to assist those with unmet housing needs by offering a Multi-family Rental New Construction Program and a Homeowner Repair Program. These programs will be discussed in detail in Part 5, Method of Distribution.

The multifamily rental new construction program will be implemented by the Ohio Housing Finance Agency (OHFA). Ohio Housing Finance Agency will partner the CDBG-DR Program with their Housing Development Assistance Program (HDAP). HDAP provides grants and loans for the development and preservation of affordable housing. Awarded as soft funding, HDAP resources enable developers and owners of affordable housing to serve households at or below 50% of Area Median Income (AMI). OHFA awards HDAP funds on a competitive basis through three funding programs based upon the other financing developers and owners are working to secure - competitive 9% housing tax credits or non-competitive 4% housing tax credits, bond gap financing, or housing gap financing. From funding

execution to project completion, OHFA new construction projects are completed in less than four years. Therefore, this model allows for maximum leverage funds and the most units completed with the funds available.

The Montgomery County Economic and Community Development (MCECD) Office will implement the Homeowner Rehabilitation and Repair Program. MCECD is a HUD Entitlement and Participating Jurisdiction currently managing HUD funding.

Part 5: Method of Distribution

The Method of Distribution is tasked with allocating resources based upon multiple layers of need and prioritization. As mentioned in Part 4, OCD will expend all CDBG-DR funds in the most impacted and distressed (MID) area. The funds are prioritized by ability to produce the maximum number of units. Due to the extent of the damage, OCD prioritized housing programs over infrastructure and economic programs. OCD will allocate the funds to the following programs: Housing Development Assistance Program (HDAP) – Affordable Multifamily Rental Program (85%), Private Owner Rehabilitation Program (10%), and administration (5%).

Program Budget

OCD anticipates Montgomery County’s unmet housing needs for its most vulnerable citizens will exceed the available funding and since the Federal Register Notice requires unmet housing needs be served first, Ohio will allocate all program dollars for housing recovery activities and administrative activities. The program budget is outlined in Exhibit 5-1 below.

Exhibit 5-1: CDBG-DR Program Budget (\$12,305,000)					
Housing Program	Allocation	% of Allocation	Amount serving LMI	LMI %	National Objective
Housing Development Assistance Program	\$10,500,000	85%	\$7,350,000	70%	LMI
Private Owner Rehabilitation Program	\$1,200,000	10%	\$1,200,000	100%	LMI
Total Program	\$11,700,000	95%	\$8,533,750	-	
Administration	\$605,000	5%	\$0	N/A	N/A
Grand Total	\$12,305,000	100%	\$8,533,750		

CDBG-DR Program National Objectives

Development designed the CDBG-DR program in compliance with the National Objectives and will ensure that communities prioritized the most disadvantaged populations. Development will ensure, as is required in the Federal Register, that at least 70% of the aggregate of CDBG-DR program funds be used to support activities benefitting low- and moderate-income (LMI) persons. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI) in the county where the applicant lives.

As a federal CDBG funds steward, Ohio complies with HUD’s mission to develop viable communities by the provision of decent housing, a suitable living environment and expanding economic opportunities. To this end, all funded activities the state administers will meet the HUD national objectives to benefit low-to-moderate income (LMI) persons. The LMI benefit national objective housing category qualifies activities undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households.

Housing Development Assistance Program (HDAP):

- National Objective: Low- and moderate-income benefit
- At least 51% of affordable multi-family units using CDBG-DR funds will be reserved for individuals at or below 80% of AMI.

Homeowner Rehabilitation and Repair Program:

- National Objective: Low- and moderate-income benefit
- All program funds will meet a low- and moderate-income national objective. Households with income higher than 80% of AMI will not be eligible for this program. Applicants will declare their income on the intake application and case managers will verify the income.

Exhibit 5-2 2019 HUD Income Limits

County	MSA or HMFA (HUD Metro FMR) Area (if indicated)	Income Category	Household Size (for >8, add 8% of the 4-person limit to the 8-person limit for each additional person)							
			1	2	3	4	5	6	7	8
Montgomery County	Dayton, OH MSA	Low-Income (80%)	\$39,550	\$45,200	\$50,850	\$56,500	\$61,050	\$65,550	\$70,100	\$74,600
		Very Low-Income (50%)	\$24,750	\$28,250	\$31,800	\$35,300	\$38,150	\$40,950	\$43,800	\$46,600
		Extremely Low-Income (30%)	\$14,850	\$17,000	\$19,100	\$21,200	\$22,900	\$24,600	\$26,300	\$28,000

Duplication of Benefits

In accordance with the Robert T. Stafford Act, as amended, Development will implement policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to recover from 2019 Presidentially Declared Disasters. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss for which the person has received financial assistance under any other program, from private insurance, charitable assistance or any other source. To prevent duplication of benefits, Development will require that all sources (federal, state, local, private and charitable) and amounts of disaster assistance received or reasonably anticipated are documented with application submission for CDBG-DR funding. Development, Ohio Housing Finance Agency and Montgomery County will monitor and review information provided to determine what, if any, duplication may occur. Applicant awardees must subrogate any additional funds received for damage caused by the presidentially declared disasters back to Development.

Public Services

Due to the overwhelming unmet housing need, Development will implement programs to serve those needs. Montgomery County will utilize the MVCAP individual recovery continuum of care to provide legal services to individual applicants. Consideration will also be made for citizens with communication limitations, disabilities, those in need of mental health services, and general health services and translation services as the need arises.

Eligible Activities

- Housing Development Assistance Program: This activity is addressed in the B.34 “Addressing Unmet Affordable Rental Housing Needs” section in the February 9, 2018 Federal Register Notice (83 FR 5844).
- Private Owner Rehabilitation and Repair: Section 105(a)(4) of the HCD Act is for Housing Rehab and is also clarified in the February 9, 2018 Federal Register Notice (83 FR 5844) under the “Clarification of disaster-related activities” “housing” section.

Planning

All programs will incorporate, where applicable, appropriate mitigation measures and floodplain management. The programs will promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially construction standards and land-use decisions that reflect responsible floodplain and wetland management and consider continued sea level rise, when applicable; and coordinate with other local and regional planning efforts to ensure consistency.

There is a need to build ongoing resiliency strategies in coordination with local governments for a more targeted investment and updated unmet needs assessment. Ohio Emergency Management Agency (OEMA) developed a comprehensive hazard mitigation strategy that seeks to eliminate or reduce risk and vulnerability to natural hazards in Ohio. The strategy provides the framework for hazard mitigation strategies and actions undertaken by local and state governments within the state. The plan is available at <https://sharpp.dps.ohio.gov/OhioSHARPP/Planning.aspx#lhmp>.

Activity Design

Housing Development Assistance Program (HDAP)	
National Objective/ Eligible Activity Regulations	Benefit to low- and moderate-income persons 24 CFR 570.483
CDBG-DR Allocation	\$10,500,000
Projected Accomplishments	The state estimates it will be able to assist up to 300 low- and moderate-income households with affordable rental units.
Proposed Start Date	2020
Proposed End Date	2024
Maximum Award	\$2,500,000
Affordability Period	30-years

Goal: The goal of the Housing Development Assistance Program (HDAP) is to provide financing for eligible housing developments to expand the decent, safe, affordable housing supply for very low-to-moderate income persons and households in the state of Ohio. HDAP, with additional CDBG-DR funds, will facilitate creating and rehabilitating quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by the storms.

Development utilizes a subrecipient agreement with the Ohio Housing Finance Agency (OHFA) to administer their funding for multi-family rental development through the HDAP. This funding includes HOME Investments Partnerships Program, Ohio Housing Trust Fund, and National Housing Trust Fund dollars. CDBG-DR funds will be incorporated into the HDAP and administered in a similar fashion to other HDAP funding sources.

Eligible activities will include constructing new rental housing units in areas impacted by the Memorial Day 2019 tornadoes, as well as rehabilitating rental developments damaged by the tornadoes. All CDBG-DR funding will serve as gap financing in developments predominantly serving low- to moderate-income households with incomes at or below 80% of the area median income.

In an effort to make the greatest impact and achieve maximize leveraging existing resources and developer experience, CDBG-DR funds will be utilized in projects also use Low-Income Housing Tax Credits (LIHTC). Specifically, OHFA will award CDBG-DR funds to eligible developments through the Bond Gap Financing (BGF) program, one of the existing HDAP programs used to fund multi-family rental projects. The BGF program provides gap financing to developments using multi-family bonds with non-competitive (4%) HTCs to renovate or construct affordable housing serving low- and moderate-income households. If coupled with LIHTC, OHFA estimates it will be able to fund at least five developments totaling 300 affordable units with the CDBG-DR funds.

This program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the tornadoes. Providing safe, disaster resistant housing for residents impacted by the 2019 tornadoes is critical to the long-term recovery strategies of the eligible areas.

- I. Eligible Applicants:** Applicants can be private for-profit, nonprofit developers/owners, or public housing authorities. As the development will also include LIHTC as a funding source, the applicants must meet all applicable experience and capacity requirements outlined in the OHFA Qualified

Allocation Plan (QAP). Applicants will be evaluated to determine if they have the ability to undertake the project, which may include, but is not limited to, prior development experience, readiness to proceed, concurrent developments underway, and experience with federal funding sources.

- II. **Projects per Developer:** Developers may submit more than one proposed development per year based upon the organization’s capacity to implement multiple and/or simultaneous projects. OHFA reserves the right to require further information and to decide on an organization’s capacity to complete multiple developments, which will include status and progress on projects using any resources provided by OHFA. OHFA may also limit the amount of total HDAP funds awarded to any single developer. OHFA reserves the right to combine the costs for developments located near each other and share similar attributes such as project type, construction style, and development team.
- III. **Eligible Activities:** Eligible activities will include constructing and rehabilitating tornado-damaged rental housing in Montgomery County and the City of Dayton, with specific focus on ZIP Code 45426 (the hardest hit area). Developments must have a minimum of 30 units. HDAP funds may be applied in the development budget toward non-related party acquisition, hard costs associated with construction, and developer fees associated with the project.

Mixed-income and mixed-use projects are eligible, but the HDAP funds may only be applied to the affordable residential portion of the overall project.

- IV. **Funding Limits:** The maximum award amount per project is \$3 million. Award amounts will be based on funding availability, construction type (new vs. rehabilitation), project needs, and number of units. Projects proposing new construction and projects proposing a higher number of affordable units will be eligible for a higher award amount as outlined below.

Construction Type	Number of Affordable Units	CDBG-DR Amount
<i>New Construction</i>	30-39	Up to \$1,500,000
	40-49	Up to \$2,000,000
	50-59	Up to \$2,500,000
	60+	Up to \$3,000,000
<i>Rehabilitation</i>	30-39	Up to \$500,000
	40-49	Up to \$750,000
	50-59	Up to \$1,000,000
	60+	Up to \$1,250,000

At the discretion of OHFA, award amount may exceed \$3,000,000 based on availability of funding and project need.

- V. **Affordability Requirements:**
Affordability period: The required length of the affordability period is 30 years for both new construction and rehabilitation projects. Aligning the affordability period with the LIHTC affordability period will allow for efficiencies in compliance monitoring for both the project owner and OHFA. The affordability period will be enforced through a restrictive covenant on the property. Compliance monitoring will be administered by OHFA and projects will be subject to the compliance monitoring schedule and requirements of the LIHTC program.

during the affordability period. Priority may be given to those developments offering a higher percentage of affordable units or targeting a lower AMI.

OHFA will use the HTC rents as the standard for determining affordable rents. Additionally, if the unit receives federal or state project-based rental subsidy, the maximum rent is the rent allowable under that rental subsidy program as long as the tenant pays no more than 30% of his or her adjusted income.

VI. Financing Structure: Awarded funds will be structured as a cash flow loan, similar to the other HDAP funding sources. Terms will be as follows:

- 2% interest charged unless otherwise agreed to by OHFA.
- Loan matures at the end of the affordability period.
- Collateral will be a subordinate mortgage. OHFA must be in second or shared-second lien position unless otherwise agreed to by OHFA based upon good cause and sufficient supporting documentation.
- Payments will be based on a percentage of the cash flow as defined by OHFA. If loan payments flow from a third party to the HDAP recipient, they will be excluded from cash flow analysis provided they are transferred to OHFA in full. Any remaining balance on the loan will be due as a balloon payment at the end of the term or upon sale, whichever is first. On a case-by-case basis, OHFA may agree to subordinate to other government investors and accept payments consistent with their terms.
- Loan interest will accrue and repayment obligations will start following project closeout, regardless of the Placed-in-Service date. Closeout means the HDAP recipient leased the affordable units, provided the appropriate documentation to OHFA, and OHFA approved the documentation as evidenced by a closeout letter from the OHFA Housing Grant Analyst.

OHFA reserves the right to allow for forgiveness of all or a portion of the outstanding debt if, at the end of the 30-year loan period, OHFA determines that the property has been maintained as a safe, decent, and sanitary affordable housing project, as defined by the Uniform Physical Condition Standards or current standards used in the OHFA Compliance Division, throughout the term.

VII. Financial Feasibility: All developments will be required to meet the financial criteria outlined in the [OHFA Multifamily Underwriting Guidelines](#). Developments will be evaluated for financial feasibility and long-term viability in accordance with the above-mentioned guidelines and the Office of Management and Budget standard of cost reasonableness. Compliance with all federal cross-cutting requirements will also be evaluated.

OHFA may evaluate developments, including those that have previously received a HDAP award, and that have received other forms of federal subsidy to determine what amount, if any, the development needs to be financially feasible. OHFA may evaluate such developments to determine the facts and circumstances that necessitate the need for additional funds and to ensure projects are not over subsidized.

VIII. Application Review Criteria and Process: All programs under the HDAP includes reviewing all applications and required supporting documentation to ensure that the development is financially feasible and meets all OHFA requirements and the specific funding source, including CDBG-DR. OHFA reserves the right to determine cost reasonableness and fees associated with the development.

The application will be assigned to a Housing Grant Analyst (HGA) who will be responsible for application review, funding agreement processing and resolving post-award implementation issues.

Funding Considerations: In evaluating proposals and making funding recommendations, OHFA will consider the following:

- Number of affordable units being created
- Location of the development
- Developer's experience and capacity
- Project's long-term financial feasibility
- Leveraging other funding sources
- Readiness to proceed
- Market viability
- Population served (e.g. family, senior, permanent supportive housing)
- Range of incomes being served (e.g. ELI, VLI)

Priority will be given to proposals that contain the following:

- New construction and/or newly affordable units
- More than 60 affordable units
- Developers with experience in Montgomery County
- Developers headquartered in Montgomery County
- Higher percentage of total development costs leveraged by non-OHFA sources

Special consideration may be given to mixed-income, mixed-use, or other proposals that are transformative in nature and are highly impactful to the community.

Threshold Review: OHFA will review applications for funding to confirm they meet all program threshold requirements and associated funding sources, as well as all applicable OHFA Underwriting Guidelines and Design Standards. Applications that do not meet the threshold requirements will not be considered for funding.

Financial Review: A financial review will include an evaluation to determine the amount of funds necessary to complete the actual project development, considering all other committed sources.

The financial review for rental housing developments includes the analysis of a 15- or 30-year pro forma, assuming a 2% annual revenue increase, a 3% annual operating expense increase, and a 7% stabilized vacancy rate. If the pro forma forecasts different assumptions, the developer must provide justification. The affordability analysis for rental developments requires the resident's rent and utility payments not to exceed 30% of an income-qualified household's income at the projected affordability level. Utility allowance information must be obtained from the local public housing authority, local utility provider, or other approved source (e.g. actual usage history on rehabilitation developments).

Pre-Award Site Visit: OHFA may conduct a site visit prior to submitting a funding recommendation. The purpose of the visit is 1) to evaluate the proposed development site for suitability and impact on the surrounding community; 2) to confirm the status of previously funded developments; and 3) to develop the relationship between the applicant and OHFA. Both parties can discuss any issues or concerns regarding the proposed development and the organization has an opportunity to familiarize OHFA staff with their overall programs and operations.

Formal Recommendation for Funding: OHFA will present the development and submit a funding recommendation, either for approval or rejection, to the OHFA Board's Multifamily Committee. This Committee will submit a formal recommendation to the OHFA's Board for consideration and approval.

Additional Requirements for Developments Receiving CDBG-DR Funding:

- 1) **Reporting and Record Keeping:** The applicant will be responsible for compliance with applicable implementation, reporting and recordkeeping requirements associated with CDBG-DR and state regulations.
- 2) **Environmental Review Requirements:** OHFA conducts a supplemental environmental review for all projects receiving HDAP funds, including CDBG-DR. The environmental review will be completed in accordance with 24 CFR Part 58. Development serves as the Responsible Entity and will grant the environmental clearance to the development upon the HUD Release of Funds.
- 3) **Development Standards:** Developments that involve rehabilitating structures must adhere to the [OCD Residential Rehabilitation Standards \(RRS\)](#) or other standards agreed upon by OHFA and the OCD. All new construction must adhere to [OHFA's Design and Architectural Standards](#), including all applicable local and state building codes.

In addition to meeting all energy efficiency requirements as stated in the Ohio Building Code or Residential Code, all multi-family developments receiving OHFA funding must obtain one of the following green building certifications as stated in the OHFA Design and Architectural Standards:

- Enterprise Green Communities
- Leadership in Energy & Environmental Design (LEED)
- ICC 700 National Green Building Standard (NGBS)

- 4) **Accessibility:** All developments receiving funding from OHFA funding are required to meet the accessibility requirements under Section 504 of the Rehabilitation Act of 1973. Additionally, all projects must to comply with the accessibility requirements as outlined in the Ohio Building Code, Chapter 4101:1-11, which includes the use of ICC/ANSI A117.1-2009 for the designing and constructing accessible units.
- 5) **Relocation Standards:** All developments, regardless of funding source, that involve rehabilitating existing occupied units must submit a Relocation Plan or rehabilitation strategy that outlines the plan to work with the tenants in place. If the development receives federal funds, the plan must meet the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. If the development involves acquisition, the applicant must supply the Real Property Acquisition and Relocation Certifications and Voluntary Acquisition Forms for the project.
- 6) **Changes to Approved Applications:** The HDAP recipient must notify OHFA, in writing, of all changes, financial or otherwise, relating to an application for financial assistance of an approved development. Failure to notify OHFA may jeopardize the applicant's ability to receive future assistance. If there are any substantive changes to the development prior to executing the Funding Agreement, OHFA may require the applicant resubmit the application.

- 7) **Cost Certification:** After construction is completed, each development may be required to obtain and submit a cost certification prepared by an independent certified public accountant or other comparable documentation approved by OHFA.
- 8) **Developer Fee Limits:** Developer's fee for applications submitted for HDAP funding must be consistent with the limits established in the OHFA Multifamily Underwriting Guidelines, QAP, BGF Guidelines, or other funding guidelines.
- 9) **Public Notification:** Applicants intending to develop rental housing must comply with the Ohio Revised Code §175.07 pertaining to public notification.

10) Fees:

Application Fee: OHFA may elect to impose application, document correction and/or funding fees as it determines necessary. Fees may be based on threshold deficiencies and designed to encourage complete and accurate application submissions with a likelihood of success.

Amendment/Extension or Reinstatement to Funding Agreements: OHFA may elect to impose a \$100 fee for each amendment or extension made to the funding agreement. OHFA may also elect to impose a \$1,000 fee to reinstate an expired funding agreement. These fees are implemented to encourage applicants to complete developments in a timely manner and as proposed in the application.

- 11) **Waivers:** OHFA reserves the right to waive state-imposed requirements if the applicant demonstrates a compelling reason. OHFA will review such requests on a case-by-case basis.

Homeowner Rehabilitation and Repair Program	
National Objective/ Eligible Activity Regulations	Benefit to low- and moderate-income persons 24 CFR 570.483
CDBG-DR Allocation	\$1,200,000
Projected Accomplishments	The state estimates it will be able to assist up to 25 low- and moderate-income households.
Proposed Start Date	2020
Proposed End Date	2024
Affordability Period	Rehabilitation = 3 years, Repair = Grant

To assist the most vulnerable families in their recovery efforts, Development developed a CDBG-DR Homeowner Rehabilitation and Repair Program to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster-resistant housing for residents impacted by the 2019 tornadoes. This program is critical to eligible areas' long-term recovery strategies.

Owner Rehabilitation

Eligible Activity Regulation: 24 CFR Part 570.202

OCD Maximum Per Unit Limit of Assistance: \$64,000 (including soft costs)

Owner Rehabilitation is intended to address problems throughout the home. In most circumstances, this means that the home's mechanical systems (electrical, plumbing and, heating systems) and exterior and interior structural components (roof, walls, floors, and foundation) will be repaired or replaced to meet the required standards. Occasionally room additions, such as extra bedrooms, can be constructed to alleviate overcrowded conditions, or other rooms and modifications can be constructed to make the home more accessible for the elderly or persons with special needs.

This activity can include replacing an owner-occupied dwelling that is unable to be rehabilitated, with an approved manufactured unit or a site-built unit located on the same property. When Owner Rehabilitation funds are used to replace a unit (commonly referred to as "reconstruction"), the funds can only pay for construction-related expenses and eligible related soft costs. In limited instances, this activity can include refinancing a small amount of existing debt on a home to be rehabilitated providing it is necessary to complete the project, as noted in 24 CFR Part 570.202 (b)(3). When refinancing is proposed, grantees must obtain prior from OCD. OCD encourages grantees to consider conducting an environmental assessment for the housing programs to ensure that the highest clearance level needed can be obtained. This will permit replacing substandard homes and other activities that, for environmental review purposes, are similar to "new construction" (such as room additions, tap-ins, etc.) to be conducted.

Because rehabilitation must correct all substandard conditions that adversely affect the occupant's health and safety and the dwelling's structural integrity, the scope of work is generally comprehensive, and the cost is usually high. However, cost limitations often require the work to be prioritized so that the most substandard conditions (i.e., problems affecting occupant health and safety and structural integrity) are corrected before less important concerns are addressed. OCD expects that all the substandard conditions be corrected before a project is considered complete. Homes that have numerous problems that cannot be corrected within the limit of financial assistance are inappropriate projects and must not be rehabilitated or considered for reconstruction unless sufficient funds from supplemental sources exist. The rehabilitation standard to which all projects must comply is in Part II of the OCD Housing Handbook known as the [State of Ohio Residential Rehabilitation Standard \(RRS\)](#).

Owner Home Repair

Eligible Activity Regulation: 24 CFR Part 570.202 (b, 2, 4, 6, 7 (iv), and 11)

OCD Maximum Per Unit Limit of Assistance: \$25,000 (including soft costs)

The purpose of the Owner Home Repair activity is to help preserve the affordable housing stock affected by the 2019 tornados by providing owner-occupied households with income levels at or below 80% of Area Median Income with limited financial assistance to correct significant problems in the home. Unlike Owner Rehabilitation, which addresses the entire home, the Owner Home Repair activity can address one or more specific problems that adversely affect occupant health and safety and/or structural integrity. If a home receives assistance from the Owner Home Repair activity and the Owner Rehabilitation activity, the total amount of assistance is subject to the same terms and assistance limit as if it had received Owner Rehabilitation assistance only and cannot be considered as an Owner Home Repair project. The types of work that are generally considered eligible for the Owner Home Repair activity include:

- *Structural System Repairs:* This type of work involves repairs to eliminate hazardous conditions or serious threats to a structural system's integrity. Examples of common structural system repairs include, patching or replacing leaking roofs, rebuilding collapsed foundations, and replacing weakened or deteriorated framing components. It may also include replacing individual non-functioning or damaged windows or entry doors.
- *Mechanical System Repairs:* This type of work involves repairs to eliminate hazardous conditions with the electrical, plumbing, or heating systems. Examples of common mechanical system repairs include replacing unsafe or overloaded electrical panels and circuits, repairing or replacing leaking water supply and/or sanitary drain plumbing lines, and repairing or replacing unsafe or inoperable heating equipment.
- *Plumbing System Tap-ins:* This type of work involves connecting a home's plumbing system to a public water supply and/or public sewage system and paying the associated tap-in fees.
- *Wells and Septic Systems:* This type of work involves repairing or replacing a home's malfunctioning private well and/or septic system or a system that has been cited by local or state health departments or the Environmental Protection Agency as outdated and needs improvement.
- *Weatherization:* This type of work involves utilizing cost-effective measures to improve energy efficiency such as insulating uninsulated attics and sidewalls, and related measures to control air movement, such as sealing holes and bypasses and installing exhaust and ventilation fans.
- *Accessibility:* This type of work involves utilizing measures designed to improve access and mobility for occupants who are physically disabled or infirm. Generally, these measures include exterior ramps, grab bars and specialized bathroom fixtures. In some cases, more extensive work is required to remove architectural barriers, widen doorways, lower cabinets, or remodel bathrooms to meet household needs. The work completed to improve accessibility must meet or exceed the design and installation standards outlined in the Uniform Federal Accessibility Standards (UFAS).
- *Lead-Based Paint (LBP) Hazard Reduction:* This type of work involves measures to eliminate known lead-based paint (LBP) hazards in homes occupied by an Elevated Blood Lead Level

(EBLL) child, or in households with children under 6 years of age. The work must be performed in compliance with all applicable state and federal regulations and guidelines, particularly those outlined in the 'HUD Guideline for the Evaluation and Control of LBP Hazards in the Home'.

Applicant Criteria

All applicant homeowners will be held to the following criteria as conditions of eligibility:

- Must be primary resident homeowner; no second homes allowed
- A control measure will be put in place in the policies and procedures to prevent reselling rehabilitated homes solely for profit.
- Household must have unmet housing need as a result of the 2019 tornado events after conducting a duplication of benefits.

Applicants will apply through the current *211 system to the MVCAP, the Miami Valley Individual Recovery first point of contact. This will help remove obstacles to applicant participation. Applicants will be able to determine application status through case managers.

NFIP Requirement

Rehabilitated homes inside the 100-year floodplain must be insured under a flood insurance policy in the amount of the lesser of either the structure's full insurable value as determined by the applicable property insurer, or the maximum amount available for the structure under the National Flood Insurance Program. The structure's full insurable value will be based upon the program's final total project cost for the applicant. Failure to maintain flood insurance will result in an applicant's property being ineligible for future disaster relief. Upon the property's sale or transfer, applicants will, on or before the date of transfer, notify all transferees in writing of the continuing obligation to maintain flood insurance on the property, and include the requirement on all documents and deeds.

Not Suitable for Rehabilitation

The definition of "not suitable for rehabilitation" will be defined in the policies and procedures governing the program.

Temporary Relocation

OCD will develop a temporary relocation assistance policy as part of the policies and procedures governing the program.,.

Exemptions

Exemptions to the Homeowner Rehabilitation Program award maximums will be granted on a case-by-case basis.

Administration and Planning Activities	
National Objective/ Eligible Activity Regulations	24 CFR Part 570.206
CDBG-DR Allocation	\$605,000
Proposed Start Date	2020
Proposed End Date	2025

Communities within the Most Impacted and Distressed ZIP Codes will receive an allocation to complete planning activities. This allocation will allow the communities to perform application intake to determine the homeowner rehabilitation and repair needs within their respective service areas. This allocation will also allow the communities to develop strategies and define target areas for the Buyout Program. Development will use a portion of the planning funds for costs associated with, but not limited to, developing the Action Plan, subsequent amendments and program guidelines.

As stated in the Federal Register Notice, grantees can use up to 5% of the total grant award for grant administration. This allocation will cover administrative costs to run the program and is designated for local government subrecipients and Development.

Administration Costs

Eligible Activity Regulation: 24 CFR Part 570.206

A maximum of 5% of the total grant request may be budgeted for eligible general administrative activities. The Fair Housing activities may be included in the CDBG administrative funds request. Eligible administrative costs are identified at 24 CFR 570.206 for CDBG Program funds. All soft costs related to work completed on a specific unit meeting a national objective or income eligibility must be paid for in one of two ways: (a) these costs may be charged to the unit; or (b) these costs may be charged to administration. All soft costs associated with projects that do not meet a national objective or income eligibility must be charged to administration. Eligible soft costs for the CDBG Program are defined at 24 CFR Part 570.202(b)(9).

Fair Housing

Eligible Activity Regulation: 24 CFR Part 570.206

Grantees must establish a Fair Housing training and outreach program specific to CDBG-DR Program activities and participants. Fair Housing information (i.e., brochures) must be distributed to each program applicant and/or assistance recipient. Grantees are required to establish a system to intake and process fair housing complaints. Grantees must maintain records to document implementing the Fair Housing program.

Planning

Eligible Activity Regulation: 24 CFR Part 570.205

Planning activities which consist of all costs of data gathering, studies, analysis, and plan preparation and identifying actions that will implement such plans. Development encourages communities to consider post-disaster recovery planning. This is an allowable expense under the planning allocation.

Expenditure Schedule

Quarter/Year	Admin & Planning	Affordable Multifamily Rental Housing	Homeowner Rehabilitation/ Repair	Cumulative Expenditures	% Expended
Q1 2020				\$0	0%
Q2 2020				\$0	0%
Q3 2020	\$7,000			\$7,000	0%
Q4 2020	\$32,000			\$39,000	0%
Q1 2021	\$32,000			\$71,000	1%
Q2 2021	\$32,000	\$1,050,000	\$175,500	\$1,328,500	11%
Q3 2021	\$32,000		\$175,500	\$1,536,000	12%
Q4 2021	\$32,000	\$1,050,000	\$175,500	\$2,793,500	23%
Q1 2022	\$32,000		\$175,500	\$3,001,000	24%
Q2 2022	\$32,000	\$1,050,000	\$175,500	\$4,258,500	35%
Q3 2022	\$32,000		\$175,500	\$4,466,000	36%
Q4 2022	\$32,000	\$2,100,000	\$147,000	\$6,745,000	55%
Q1 2023	\$32,000			\$6,777,000	55%
Q2 2023	\$32,000	\$2,100,000		\$8,909,000	72%
Q3 2023	\$32,000			\$8,941,000	73%
Q4 2023	\$32,000	\$2,100,000		\$11,073,000	90%
Q1 2024	\$32,000			\$11,105,000	90%
Q2 2024	\$30,000	\$1,050,000		\$12,185,000	99%
Q3 2024	\$30,000			\$12,215,000	99%
Q4 2024	\$30,000			\$12,245,000	100%
Q1 2025	\$30,000			\$12,275,000	100%
Q2 2025	\$30,000			\$12,305,000	100%
Q3 2025				\$12,305,000	100%
Q4 2025				\$12,305,000	100%
Q1 2026				\$12,305,000	100%
Total	\$605,000	\$10,500,000	\$1,200,000	\$12,305,000	
Anticipated households assisted:		300	20		320
Cost Per Unit:		\$ 35,000	\$ 60,000		-

General Requirements

Protection of People and Property: Construction Methods

The housing assistance provided under the CDBG-DR program will be built with emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. These include the following minimum standards:

- Construction standards will be based on Ohio's Building Codes and must meet or exceed applicable requirements. HDAP new construction projects must meet [OHFA's Design and Architectural Standards and Rehabilitation](#) and Repair Project must meet Development's [Residential Rehabilitation Standards](#).
- Construction will comply with a Green Building Standard for all new residential building construction and for all substantially damaged residential building repairs. The state will require that these construction and repair activities meet an industry-recognized standard that has achieved certification under at least one of the programs listed in paragraph B.32.a of Section VI. (83 FR 5850 and 83 FR 5861).
- For rehabilitating non-substantially damaged buildings (where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab), the state will follow the Green Building Retrofit Checklist. To note, this requirement does not apply when Energy Star, Water-Sense Labeled, or FEMP-designated products do not exist. (83 FR 5850 and 83 FR 5861).
- OCD will provide a mechanism for homeowners to appeal rehabilitation work quality.
- OCD will require a warranty period post-construction for housing with all work being performed by the contractor. Information about the complainant's rights and how to file a complaint or appeal regarding work quality will be printed on program applications and/or guidelines. Complaints should be submitted to the local government subrecipient and responded to in a timely manner. The local government subrecipient will keep records of each complaint on file.

Home Elevation

The state will require the following elevation standards for new construction, repair, or substantial damage, or substantial improvement:

All structures designed principally for residential use and located in the 100-year (or 1% annual chance) floodplain that receive assistance, must be elevated with the lowest floor, including the basement, at least two feet above the base flood elevation. Mixed-use structures with no dwelling units and no residents below two 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 successor standard, up to at least two feet above base flood elevation.

Property owners assisted through the recovery program will be required to acquire and maintain flood insurance if their properties are located in a FEMA-designated floodplain. This requirement is mandated to protect resident safety and their property and federal funding investments. The state will ensure adherence to Section 582 of the National Flood Insurance Reform Act requiring property owners receiving disaster assistance triggering the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so.

By achieving the goals within this Action Plan, initiating strong and energy efficient building codes, and requiring both residential and non-residential structures be built at least two feet above the new Advisory Base Flood Elevation (ABFE), the state guarantees a more successful long-term disaster recovery, ensuring a strong, healthy environment and citizens' safety and welfare.

Elevation activities and eligible costs will be further defined in the program guidelines.

Section 8 Tenants and Housing Needs of Persons that are Homeless

OCD will encourage subrecipients to identify private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program; and any other housing assisted under a HUD program that needs rehabilitation, reconstruction, or replacement. OCD will also encourage subrecipients to identify emergency shelters and transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are homeless and at-risk of homelessness. OCD has existing programs that subrecipients may refer these persons to that may be able to help.

Cost Reasonableness/Effectiveness

Cost-effectiveness will be outlined in the Disaster Recovery Program Housing Guidelines. The program guidelines for HDAP will detail the controls for housing projects involving eight or more units.

Demonstrable Hardship & Exceptions

OCD will further develop detailed program guidelines in and exceptions to the policies and procedures to address situations not considered during the program design phase. The exceptions policies and procedures will consider changes to the maximum award amounts for applicants who demonstrate undue hardship and other exceptional situations. Demonstrable hardship may include but is not limited to prolonged job loss, substantial reduction of household income, death of a family member on whom the surviving household was financially dependent, illness, unexpected and extraordinary medical bills, disability, etc. OCD will further define “demonstrable hardship” and the exception policies in program policies and procedures.

Stormwater Infrastructure Needs

The state will work with local government subrecipients to identify stormwater infrastructure needs. Stormwater improvements will be made as a result of a housing need within flood-impacted areas.

Leveraging of Funds

OCD is seeking to leverage CDBG-DR funds on projects utilizing Low Income Housing Tax Credits (LIHTC). Although a tax credit allocation is not considered federal financial assistance under the Uniform Relocation Act and Section 104(d) of the Community Redevelopment Act of 1974, OCD requires owners of projects that receive a Tax Credit Allocation make every effort to minimize displacing existing tenants.

No other federal funds are expected to be used on the projects.

Additional Resources

CDBG-DR funds are a last resort funding source. The state worked with HUD, FEMA, SBA, other federal agencies and state agencies to identify and catalog available sources of assistance for recovery from the 2019 Presidentially Declared Disaster. OCD will ensure that CDBG- DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

Exhibit 5-3 Other Funding Sources

FEMA Individual Assistance grants	Natural Resources Conservation Service
FEMA Hazard Mitigation Grant Program	Water Conservation District funds
SBA Disaster Loans	USDA Farm Service Agency's Emergency
National Flood Insurance Program	Drinking Water and Water Pollution Control
Private insurance	Private foundations

Part 6: Program Administration

Citizen Participation – Outreach Efforts

OCD in conjunction with the Ohio Housing Finance Agency met with local officials of most impacted and distressed (MID) area, Montgomery County and City of Dayton after receiving notification of the state's CDBG-DR allocation. OCD informed the communities of the state's CDBG-DR Program allocation and discussed MID and housing requirements, discussed the tornadoes' impact and further assessed unmet need.

Public Notice and Comment Period of Draft Action Plan

Development encourages involvement from citizens in all aspects of the CDBG-DR Program. To this end, Development seeks to ensure citizens and interested members of the public have an opportunity to review and comment on the draft Action Plan. The draft Action Plan will be posted on Development's website for a 30-day public review period beginning on July 9, 2020. A summary of all comments and responses will be included in the final Action Plan submitted to HUD for approval. The final, HUD-approved Action Plan will be posted on Development's website at https://development.ohio.gov/cs/cs_cdbg-dr.htm.

Amendments to the Action Plan

As additional information becomes available and programs evolve through the grant administration process, amendments to this plan are expected. Prior to adopting any substantial amendment to this Action Plan, Development will publish the proposed amendment on the CDBG-DR web page and will afford citizens, affected local governments, and other interested parties a reasonable opportunity to examine the plan's or amendment's contents and make comments. Substantial amendments include adding or deleting any allowable activity described in the approved application; allocating or reallocating more than \$1 million; or a change in planned beneficiaries. Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery web page. For other non-substantial amendments, the state will notify HUD, but public comment is not required. Every amendment, substantial or not, will be posted on the CDBG-DR web page in addition to all previous versions of the plan.

Performance Reporting

In accordance with HUD requirements, OCD will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than 30 days following the end of each calendar quarter. Program QPRs will be posted to Development's website on a quarterly basis until all funds are expended and all expenditures reported.

Limited English Proficiency

OCD is committed to providing all citizens with equal access to information regarding the CDBG-DR Program, including persons with disabilities and limited English proficiency (LEP). OCD follows HUD's regulation, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development—Effectuation of Title VI of the Civil Rights Act of 1964", which requires all HUD grantees provide meaningful access to LEP individuals. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Where a significant number of non-English speaking residents can be reasonably expected to participate in public

hearings or open comment periods, printed materials will be translated into the appropriate language, citizen comments in a language other than English will be translated, and translators will be present.

Applicants

Application intake will be performed by the subrecipients. Subrecipients will be required to keep applicants informed on their application status and be responsive to inquiries.

Citizen Complaint Procedures

Citizens may file a written complaint or appeals through the Disaster Recovery email at CDBG-DR@development.ohio.gov or submit by mail to the following address:

Ohio Development Services Agency
Office of Community Development
Attention: CDBG-DR
77 South High Street
Columbus, OH 43215

OCD will make every effort to provide a timely response within 15 working days of the receipt of complaint, where practicable. Responses to documents mailed to the office may experience longer delays due to remote work as a result of the COVID-19 pandemic.

Program Income

If subrecipients generate program income through the CDBG-DR programs, the state will follow guidance provided in section 17 (Program income alternative requirement) in 81 FR 39702 (2016). Per that guidance, income received prior to the grant closeout will be utilized as additional CDBG-DR funds in the same manner as other CDBG-DR funds referenced. Any income received after the grant closeout, will be transferred to OCD's annual CDBG award.

Pre-agreement Activities

The provisions at 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs it, its subrecipients and subgrantees incurred on or after the covered disaster occurred. The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by it, its subgrantees or subrecipients prior to executing a grant agreement with HUD. This includes but is not limited to activities supporting program development, action plan development and stakeholder involvement support and other qualifying eligible costs incurred in response to an eligible disaster covered under Public Law 114-254. OCD incurred pre-award costs and will seek reimbursement for these costs that are reasonable and allowable under this regulation. These include salary, fringe benefits, and direct operating costs for each employee based on their individual percentage of time spent on planning the state's CDBG-DR program.

Anti-displacement

The State of Ohio plans to minimize displacing individuals or entities and assist individuals or entities displaced due to implementing a project with CDBG-DR funds. The state will ensure that the assistance and protections afforded to individuals or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community

Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The state accepts the HUD waiver of Section 104(d) requirements which assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-5938-N-01.

Appendices

Comments on the CDBG-DR Action Plan

The Office of Community Development held the 30-day public comment period beginning July 9, 2020, along with a virtual Public Hearing that was held via WebEx on July 23, 2020. All information that was made available for public viewing and comment along with the memo announcing these opportunities was posted on the Development website at https://development.ohio.gov/cs/cs_cdbg-dr.htm

All comments received along with the corresponding responses prepared by OCD concerning the Draft PY 2020 CDBG-DR Action Plan have been included below:

Tawana S. Jones
Community and Economic Development Operations Manager
Montgomery County Business Services-Community and Economic Development

Comment/Question:

Can you provide additional clarification about the funds being used in areas outside of zip code 45426?

Response:

HUD requires 80% of the funding to be spent in the Zip Code 45426 (Trotwood) by regulation. However, understanding that maybe too restrictive, HUD allows in 83 FR 5868 for the ‘most impacted and distressed’ (MID) area to be opened to the entire County in which the zip code sets. Therefore, Montgomery County (including the City of Dayton) will be the eligible area for the projects, with a focus on the Trotwood/Harrison township area if possible. Due to the small amount of funding received for CDBG-DR, ODSA decided to limit all funds to Montgomery County (MID area) to provide the most impact.

Adam Blake, Vice President of Housing
County Corp Affordable Housing

Comment/Question:

Currently there are four agencies working with homeowners in Montgomery County directly impacted by the Tornadoes with funding provided by the Federal Home Loan Bank of Cincinnati’s Disaster Recovery Program: County Corp, Rebuilding Together Dayton, Habitat for Humanity and MV CAP. Here is the most recent reporting from the FHLB:

FHLB Disaster Recovery Program													
Dayton Ohio													
	2019		2020		2021		Total		Withdrawn		Completed		
Partnership	#	\$	#	\$	#	\$	#	\$	#	\$	#	\$	
County Corp and CareSource	6	\$96,465	12	\$186,865	0	\$0	18	\$283,330	4	\$36,500	3	\$37,655	
Habitat and CareSource	2	\$25,792	17	\$217,724	0	\$0	19	\$243,517	1	\$11,385	9	\$98,688	
MVCAP and Key	6	\$120,000	0	\$0	0	\$0	6	\$120,000	0	\$0	5	\$77,081	
Rebuilding Together Dayton & Huntington	7	\$95,680	5	\$68,757	0	\$0	12	\$164,437	0	\$0	8	\$59,768	
Total....	21	\$337,937	34	\$473,346	0	\$0	55	\$811,284	5	\$47,885	25	\$273,193	
FHLB CAP (\$500K per sponsor and member)		\$2,000,000		\$2,000,000		\$2,000,000		\$6,000,000					
* Eligibility ends June 18, 2021													
* The last day a reservation can be submitted is 6-18-21. Commitment expiration would be 1 year or 6 months after the approval date, depending on the project type.													

You'll note that MVCAP has made the least number of reservations and requested the lowest amount of funding. Given this, I am concerned that MV CAP is the only agency listed in the CDBG DR Draft to assist homeowners with this program.

From Page 75 of the draft: *Applicants will apply to the MVCAP, the Miami Valley Individual Recovery point of contact. This will help remove obstacles to the applicant participation. Applicants will be able to determine application status through case managers. MVCAP's website will include a listing of all intake centers and contact information.*

Based on the evidence and performance of all four agencies listed above and the capacity these agencies have developed with FHLB DRP, it doesn't make sense to have MVCAP the only agency involved in working with homeowners who are dealing with repair issues. MVCAP has worked with the LEAST number of homeowners with the FHLB DRP program. Why wouldn't ODSA want ALL of the agencies with capacity and experience working with these homeowners?

Response:

Thank you very much for this information and feedback.

This was a misunderstanding that MVCAP was the first point of contact for all the Miami Valley Disaster Individual Recovery funding. There was no attempt to exclude anyone, only identify the system already in place. Therefore, the CDBG-DR Action Plan was been updated to reflect the applicant will apply through the current system for individual recovery in place with the *211 line.

Matthew Currie, Managing Attorney
Advocates for Basic Legal Equality, Inc.

Comment:

- Advocates for Basic Legal Equality and the Miami Valley Fair Housing Center
 - LIHTC Awards in Ohio, 2006-2015: Where are They Providing Housing for Families with Children?
 - Using LIHTC to Providing Housing Opportunities for Families with Children in Ohio: Progress Report 2018
-

Response:

Upon approval of the plan, OHFA will begin to develop a Request for Proposals (RFP) with competitive criteria similar to that which is included in their Qualified Allocation Plan (QAP) and their Bond Gap Financing (BGF) guidelines. As noted in the plan, the State of Ohio has the discretion to expand the target area to include the entirety of Montgomery County and intends to do so. OHFA will consider inclusion of competitive criteria or incentives to develop in areas with less than 10% poverty, and/or less than 25% racial concentration, and/or in areas of High and Very High Opportunity according to OHFA's USR Opportunity Index, developed in partnership with The Ohio State University's Kirwan Institute for the Study of Race and Ethnicity.

**Written Comments of
Advocates for Basic Legal Equality
and the
Miami Valley Fair Housing Center
on the
Development Services Agency's Office of Community Development
Draft Program Year (PY) 2020 Community Development Block Grant Disaster Recovery
(CDBG-DR) Montgomery Country Action Plan**

Pursuant to the July 9, 2020 Notice of Public Hearing and 30-Day Public Comment Period from Matthew LaMantia, Deputy Chief, Office of Community Development, these Comments are being submitted on August 9, 2020 via email to CDBG-DR@development.ohio.gov

Introduction

Thank you for the opportunity to provide comments to the Ohio Development Services Agency's Office of Community Development Disaster Recovery CDBG-DR Plan for Montgomery County ("Action Plan"). Advocates for Basic Legal Equality, Inc. ("ABLE") is a non-profit regional law firm that provides high quality legal assistance in civil matters to help eligible low-income individuals and groups in western Ohio, including Montgomery County, achieve self-reliance, and equal justice and economic opportunity. Part of our work is to use the law to support community efforts that will stabilize property values, increase economic resources and improve the quality of life in the communities where our client populations lives. The feedback and suggestions below are informed by our work, including our work that supports community efforts to grow our local economy and create wealth from the ground up.

The Miami Valley Fair Housing Center, Inc. ("MVFHC") is a private, nonprofit 501(c)(3) organization in Dayton, Ohio, that recognizes the importance of "home" as a component of the American dream. We seek to eliminate housing discrimination against all persons because of race, color, religion, national origin, sex, disability, familial status, or any other characteristic protected under state or local laws. For the past 27 years, the Fair Housing Center has passionately pursued its mission to eliminate housing discrimination and ensure equal housing opportunity for all people in our region, the State of Ohio, and nationally.

Among the Fair Housing Center's core mission and goals is to support diverse and inclusive neighborhoods replete with the opportunities and resources people need to thrive. We work for the elimination of segregation in housing and the ability of our constituents to live in racially integrated communities. MVFHC has launched multiple educational campaigns to address housing discrimination designed to teach both consumers and housing professionals about equity

for neighborhoods, the negative consequences that flow from racial steering, and the benefits of residential diversity. The Fair Housing Center also has goals of identifying barriers to fair housing, protecting and improving fair housing laws, increasing broad public awareness and support of equal housing opportunity, and increasing investments in under resourced communities of color.

As organizations who constantly work to implement equity and anti-racist lenses to our advocacy, we submit these comments with a focus on ensuring equal housing opportunity for all families impacted by the tornados and the communities in Montgomery County. We are concerned and want to ensure the Action Plan will enable the State of Ohio, the Ohio Housing Finance Agency (“OHFA”) and local jurisdictions, as recipients of federal funds, to meet their legal obligation to affirmatively further the purpose of the federal Fair Housing Act, as amended. 42 U.S.C. §§ 3601 *et seq.*

There are four compelling reasons to revise the Action Plan: (1) The Action Plan relies upon the State of Ohio’s Analysis of Impediments to Fair Housing Choice (AI), not the regional AI for Montgomery County, and the Cities of Dayton and Kettering; (2) The 2019 Memorial Day Tornadoes primarily affected high poverty and racially segregated neighborhoods in Montgomery County; (3) While investment in the areas most critically affected by the tornadoes is important, the Action Plan fails to take into consideration the long-term pernicious racial segregation in Montgomery County; and (4) In order to meet obligations to promote fair housing choice¹ the State of Ohio and OHFA must develop affordable housing in areas of Montgomery County with poverty

¹ Both ABLE and the MVFHC have been in communication with OHFA since at least 2015 noting OHFA LIHTC awards have perpetuated racial and economic segregation of families with children in Ohio urban areas, including Montgomery County. These letters and other comments to OHFA are supported by two independent reports, from Abt Associates, published in 2016 and 2018. These reports are attached.

rates of less than 10 percent and areas with low racial concentrations where less than 25 percent of the population is Black or African American².

Background

Dayton, like other Ohio cities and cities throughout the country was built during a time of government sponsored and sanctioned discriminatory policies.³ For example, in 1937 the Home Owners' Loan Corporation created a "Residential Security 'Redlining' Map" for the Dayton area⁴ along with area description explaining the basis for the grade in area of the map.⁵ This map and the Area Descriptions "document how loan officers, appraisers, and real estate professionals evaluated mortgage lending risk during the era immediately before the surge of suburbanization in the 1950's."⁶ "Neighborhoods considered high risk or 'Hazardous' were often 'redlined' by lending institutions, denying them access to capital investment which could improve the housing and economic opportunity of residents."⁷ African Americans, immigrants, and low wage workers made up the population, or the projected population, of the neighborhoods deemed high risk, hazardous and therefore red lined.⁸

Like the rest of the country, these discriminatory policies are still impacting the lives of Dayton residents.⁹ The Action Plan briefly discusses high and low-opportunity areas, and how the

² In these comments, the terms "Black" and "African American" are used interchangeably.

³ See generally, Richard Rothstein, *The Color of Law, A Forgotten History of How Our Government Segregated America* (2017).

⁴ https://library.osu.edu/documents/redlining-maps-ohio/maps/Dayton_map.JPG.

⁵ https://library.osu.edu/documents/redlining-maps-ohio/area-descriptions/Dayton_Area_Description.pdf.

⁶ Bruce Mitchell PhD, *HOLC "redlining" maps: The persistent structure of segregation and economic inequality*, National Community Reinvestment Coalition, March 20, 2018.

⁷ *Id.*

⁸ See, e.g., Home Owners Loan Corporation (HOLC) Residential Security "Redlining" Map Area Descriptions Dayton, Ohio 1937.

⁹ See, e.g., Pub. Health Dayton & Montgomery Cty., *Opportunity Mapping: The Geography of Opportunity Dayton Ohio* (2015), http://www.mvfairhousing.com/ai2015/2015-02Opportunity_Mapping.PDF; Pub. Health Dayton &

destruction from the Memorial Day Tornadoes of 2019 primarily impacted those low-opportunity areas. (Action Plan at 59-61). “Low-opportunity areas” are closely aligned with redlined neighborhoods. As the Action Plan explains, the State of Ohio and OHFA are prepared to invest in these areas to create more affordable housing (Action Plan at 67-71), ABLE and the MVFHC are concerned that this will only perpetuate the segregation of low-income families and people of color in these “low-opportunity areas.”

Discussion

1. The Action Plan must incorporate and rely upon the local Analysis of Impediments.

The Action Plan seems to rely only on the State of Ohio Analysis of Impediments to Fair Housing and the recommendation in the state AI, although it references the “Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering”. (Action Plan at 40-45). The AI assists in the statutory requirement to affirmatively further fair housing by ensuring housing and community development programs not only do not discriminate, but that they identify, plan for, and take active steps to undo historic patterns of segregation and other types of discrimination. An AI also identifies needs for access to opportunity for those to whom it has historically been denied, including access to better education, jobs and living conditions like the kinds of physical danger residents may be exposed to, the kinds of professional and social associations available in the community, and what kinds of values and expectations are opened up to residents. If the Action Plan does not incorporate the Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering and

Montgomery Cty., Opportunity Mapping: The Geography of Opportunity Montgomery County Ohio (2015), and https://www.mcoho.org/departments/human_services_planning_and_development/MC_Opportunity_Map.pdf.

intentionally address the identified impediments, these CDBG-DR funds will not only fail to affirmatively further fair housing, but also will perpetuate enduring patterns of segregation.

2. The 2019 Memorial Day Tornadoes primarily impacted low-opportunity areas in Montgomery County.

In 2015 Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering (“AIMC”),¹⁰ opportunity maps illustrate where in the City of Dayton there is more or less opportunity. “Opportunity” was defined as having access to “employment, healthcare, decent and affordable housing, quality education, and goods and services.” (AIMC at 39). There are also opportunity maps for Montgomery County,¹¹ created by the same public entity whose map is used in the AIMC, that clearly show the neighborhoods impacted by the tornadoes are generally low opportunity areas, “due to housing and neighborhood conditions, transportation options, [and] access to healthcare, goods, and services.” (AIMC at 39). The Action Plan also notes areas hit by the tornadoes – the City of Trotwood, Harrison Township, and Northwest Dayton – were in the very lowest opportunity index for Ohioans *prior to the tornadoes* and are now areas with a “strong decline” in the likelihood for community change. (Exhibit 4-3 of Action Plan at 60). The bulk of the impacted areas are primarily neighborhoods of color, and low-moderate income census tracts. Additionally, the Northeast Dayton impacted area has a high percentage of persons who speak English “less than well.” (AIMC at 14-25; Exhibit 1-16 of Action Plan at 27).

¹⁰ AIMC is available at

http://mvfairhousing.com/ai2015/2015-10-23_2015_AI_Montgomery_County_Dayton_Kettering.PDF.

¹¹ While the AIMC contains an opportunity map for the City of Dayton completed by Public Health Dayton & Montgomery County, Public Health released an opportunity map for the entire county in May 2015. It is available on the Montgomery County website,

https://www.mcoho.org/departments/human_services_planning_and_development/MC_Opportunity_Map.pdf.

Twenty separate tornadoes struck the Dayton area on Memorial Day weekend 2019. More than 6,000 homes were affected, and unfortunately, most of the damage occurred in areas with low to moderate income residents. (Exhibit 1-18 of Action Plan at 28). Fifty-two percent were single-family dwellings, 46% were apartments, and 2% were mobile homes. (Action Plan at 46). Sixty-two percent of the affected residents were not insured, and 14.9% were in poverty households. (Action Plan at 48). HUD identified zip code 45426 in Montgomery County (the City of Trotwood) as the most impacted and distressed area because of the tornadoes. According to selectmcoho.com, 71.1% of residents in Trotwood are Black or African American, and 23.3% are White. In Harrison Township, also impacted by the tornadoes, 44.27% of residents are Black and 50.95% are White. (*See also* AIMC at 24).

Under-resourced areas like Trotwood, Harrison Township, or Northwest Dayton means students in the school district experience more homelessness,¹² renters experience severe housing cost burdens,¹³ and the communities have a high poverty rate.¹⁴ According to the Action Plan, the low-to-moderate incomes of these areas and the damage caused by the tornado will make it very difficult to reverse the downward economic trend for the County. (Action Plan at 28).

3. While it is important to invest in the areas critically impacted by the tornadoes, there is concern that these investments are not considering the perpetuation of preexistent, incessant effects of racial segregation in Montgomery County communities.

Montgomery County residents, primarily people of color, still experience harm of being purposefully segregated into low opportunity areas. According to the AIMC, three of the 13 impediments listed deal directly with racial issues in the Dayton/Montgomery County area.

¹² 6.8% of students enrolled in Trotwood-Madison City school district experience homelessness. (Action Plan at 9).

¹³ Renters in the Trotwood-Madison City school district rank 20th in the state for school district where renter-occupied households are experiencing severe house cost burden (severe cost burden occurs when a family spending at least 50% of a household's income on rent and utilities). (Action Plan at 8).

¹⁴ The Trotwood area has a poverty rate is 25.6% with an average household income of \$32,977. (Action Plan at 19).

Specifically, impediment 5, 10, and 11. (AIMC at 171, 173). The Action Plan discusses the Analysis of Impediments for the entire state of Ohio, but not the localized analysis for Montgomery County. This is problematic because in terms of rural and urban areas, Ohio is a very diverse state. The statewide AI addresses many concerns more applicable to the rural areas of Ohio, which while important, do not speak to the experiences of those living in Montgomery County. While the issues addressed by the Action Plan are important, there are more pressing needs to address identified in the Montgomery County Analysis of Impediments, particularly, the persistence of racial segregation.

AI 5 for Montgomery County is “Race, Ethnicity, and Color.” According to the AIMC, “Racial segregation is a persistent impediment of fair housing in the region due to income disparity, dual housing markets, and continued steering in the real estate market based on color, race and ethnicity.” (AIMC at 171). There are areas in Montgomery County (in the City of Dayton) where 92% of the population is Black, and other areas (outside the City of Dayton) where 90% of the population is White, proving there is still ethnic and racial clustering in the region. (AIMC at 172). In a test determining favorable behaviors, 10 out of 14 times African American home seekers received less favorable treatment than White home seekers. (AIMC at 171).

AI 10 for Montgomery County is “Systemic Lending Issues.” The AIMC explains that lending institutions do not maintain and market foreclosed properties in neighborhoods of color to the same degree they do in White neighborhoods. This disparately affects large areas in the cities of Dayton and Trotwood as well as in Jefferson Township. (AIMC at 173). Of the nearly 7,000 abandoned properties in Montgomery County in 2015, most were older homes in low-income and minority neighborhoods. (AIMC at 173).

AI 11 for Montgomery County is “Industries that Interconnect with Residential Homeownership.” Impediment 11 clearly states “[d]iscriminatory practices in real estate, mortgage lending, residential appraisal, and homeowner insurance markets exist which limit housing choice and availability.” (AIMC at 173). To this day, real estate appraisers consider the racial composition of neighborhoods when appraising homes, appraising neighborhoods of color lower than white neighborhoods. (AIMC at 173). “Because most lending institutions will not issue mortgages for properties valued below \$50,000, low appraisals limit the ability to obtain mortgages in neighborhoods of color, preventing investment by owner-occupants, in particular minorities, because they have less access to capital than Whites. Properties in neighborhoods of color are instead available only to investors with sufficient cash or are left abandoned, contributing to neighborhood blight.” (AIMC at 173).

Areas of Montgomery County have faced racial segregation and economic disparity for nearly a century. As explained above, residents living in these low-opportunity areas are often trapped by the lack of available resources necessary to allow for economic growth. After the tornadoes ripped through these low-opportunity areas, the first inclination was to help restore those areas. While it is important to rebuild what was destroyed, the draft Action Plan shows that the authors do not fully comprehend the stark racial disparities in Montgomery County. It is insufficient to restore Montgomery County to the way it was prior to the tornadoes. The Action Plan must direct investments to ensure that affordable housing is available in well-resourced, high opportunity areas.

4. The State of Ohio and OHFA must develop affordable housing in well-resourced, high opportunity areas in Montgomery County, in order to provide residents with the opportunity to move to these areas.

“Opportunity is not something that an individual can possess; rather, it is something that a person can experience. . . . Because opportunity is a set of

conditions that people experience, housing and neighborhoods are at the forefront of most people's minds when considering relocation in opportunity-rich communities. . . . The American Dream combines the concepts of economic and social opportunity by describing an American culture that both is economic and fair; stable and inclusive.” (Action Plan at 59, 61).

Should the State of Ohio, OHFA, and the impacted jurisdictions exclusively fund the construction of affordable housing in areas that are low-opportunity, high poverty,¹⁵ and racially concentrated,¹⁶ the stark economic and racially segregated housing patterns in Montgomery County, Ohio will perpetuate.

The racist public policies of the early 1900s are the antithesis of national principles embodied in the federal Fair Housing Act. There is ample empirical data to prove it is not only inadequate, but also unacceptable to commit public funds to restoring Montgomery County back to its state of being prior to the tornadoes of Memorial Day weekend 2019. The State of Ohio, OHFA and local jurisdictions are compelled by the Fair Housing Act to affirmatively choose to build affordable housing in areas with less than 10% poverty and with populations of less than 25% Black.¹⁷ Doing so provides all people real equal housing opportunities, and enables them to move to areas that best meet their needs.

Conclusion

From the crisis of the 2019 Memorial Day tornados springs an opportunity for the State of Ohio, OHFA and the local jurisdictions to create real housing choice and begin to eliminate impediments to equal housing opportunity. Seizing this opportunity is incumbent upon the elected

¹⁵ Defined as areas where the poverty rate is more than 10%.

¹⁶ Defined as areas where 25% or more of the population is Black or African American.

¹⁷ See the attached reports by Abt on the OHFA LIHTC program.

officials, public officials, and employees of Montgomery County and the State of Ohio. Doing so will also make them the vanguard of their peers from across the nation.

The CDBG-DR Action Plan explains that “[t]he Disaster Recovery project will have significant, long-term economic benefits to the Miami Valley region[.]” (Action Plan at 40). If significant, long-term economic benefits are to be realized, the investment of these funds must be mindful of the historic bad public policy that created the economic and racial segregation imposed upon residents of Montgomery County over the past century. The solution is not to simply build more affordable housing in the communities most devastated by the tornadoes. These neighborhoods need investment in spheres of life like access to fresh food, quality schools, public transportation, and social services. Housing units (new and replacement) funded by the Action Plan cannot only be sited in the communities stricken by the tornadoes. Rather, housing units must be created in areas of low poverty and low racial concentrations. Anything different will not address the impediments to Fair Housing Choice chronicled in multiple Analyses of Impediments for Montgomery County, Ohio over the past thirty years. Instead, it will exacerbate the impediments the County has been promising the federal government it was working to eliminate for more than 30 years.

We hope our comments and suggestions are given due consideration before funding decisions are made. Thank you for your consideration and time.

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