

CITY OF MOBILE LOCAL RECOVERY PLAN

**Hurricane Sally DR-4563
and Zeta DR-4573**

November 7, 2024

Revised submission to ADECA



Prepared for:
City of Mobile



Prepared by:
Civix

Table of Contents

1 Executive Summary	1
1.1 Overview	1
1.2 Disaster Overview	1
1.2.1 Hurricane Sally (DR-4563)	1
1.2.2 Hurricane Zeta (DR-4573).....	2
1.3 Summary	2
1.4 Unmet Needs and Proposed Allocation	3
2 Disaster Impacts	5
2.1 Housing.....	5
2.1.1 Pre-Disaster Housing Conditions	5
2.1.2 Disaster Impacts on Housing	11
2.1.3 Housing Unmet Needs Methodology.....	16
2.1.4 Housing Unmet Needs Analysis.....	18
2.2 Infrastructure.....	20
2.2.1 Pre-Disaster Conditions.....	20
2.2.2 Disaster Impacts	24
2.2.3 Unmet Needs Methodology.....	25
2.2.4 Unmet Needs Analysis	25
2.3 Economic Development.....	27
2.3.1 Pre-Disaster Conditions.....	27
2.3.2 Disaster Impacts	29
2.3.3 Unmet Needs Methodology.....	29
2.3.4 Unmet Needs Analysis.....	30
2.4 Demographics.....	32
2.4.1 Demographic Overview	32
2.4.2 Demographic trends.....	32
3 Mitigation Needs Assessment	42
3.1 Overview.....	42
3.2 City Context	42
3.3 State Hazard Mitigation Plan	46
3.4 Regional Hazard Mitigation Plan.....	47
3.5 Local Planning Efforts	48

3.5.1 Map for Mobile: Framework for Growth.....	49
3.5.2 Mobile City-Wide Resilience Assessment and Plan	49
3.6 Greatest Risk Hazards	51
3.6.1 Drought / Extreme Heat	51
3.6.2 Flooding.....	52
3.6.3 High Winds.....	52
3.7 Critical Service Areas and Community Lifelines.....	56
3.7.1 Critical Service Area 1: Safety and Security.....	57
3.7.2 Critical Service Area 2: Food, Water, Shelter, Waste/Sanitation.....	57
3.8 Risk Distribution Among LMI or Otherwise Vulnerable Communities and Protected Classes.....	57
4 MID Recovery Zones.....	59
4.1 Overview.....	59
5 Proposed Activities	67
5.1 Overview.....	67
5.2 Program Priorities.....	68
5.3 Connection to Unmet Needs	71
5.4 Program Details	72
5.4.1 Affordable Rental Housing Development Program	72
5.4.2 Priority Infrastructure Program (PIP).....	77
6 General Requirements.....	83
6.1 Public Participation	83
6.1.1 Outreach and Engagement.....	83
6.1.2 Consultation.....	83
6.1.3 Public Hearings.....	84
6.1.4 Public Comment.....	85
6.1.5 Complaints.....	85
6.2 Amendments	86
6.3 Displacement of Persons and Other Entities.....	87
6.4 Protection of People and Property.....	87
6.4.1 Flood Insurance Requirements.....	87
6.4.2 Construction Standards.....	88
6.4.3 Preparedness, Mitigation and Resilience.....	88
6.4.4 Broadband Infrastructure in Housing.....	88

6.4.5 Cost Effectiveness	89
6.4.6 Duplication of Benefits.....	89
6.5 Program Income.....	90
6.6 Resale or Recapture	90
6.7 Capacity Assessment.....	91
6.8 Federal Requirements.....	91
6.8.1 Environmental Review.....	91
6.8.2 URA - Acquisition and Relocation.....	91
6.8.3 Labor Standards	92
6.8.4 Elevation Requirements.....	92
6.8.5 Building Standards.....	93
6.8.6 Section 3.....	94
6.8.7 Minority and Woman-Owned Business Enterprises (M/WBE)	94
6.8.8 Civil Rights and Non-Discrimination.....	94
6.8.9 Americans with Disabilities Act.....	95
6.8.10 Conflict of Interest and Confidentiality.....	95
7 Appendix.....	96
7.1 Important Definitions and Terms.....	96
7.2 Stakeholder Outreach List	97
7.3 Summary and Response to Public Comments	98

List of Figures

Figure 1: Census Tracts by Housing Burden National Percentile, City of Mobile.....	9
Figure 2: FEMA IA Registrants by Census Tract, City of Mobile.....	13
Figure 3: FEMA IA Registrants with Major or Severe Damage, City of Mobile.....	14
Figure 4: Census Tracts Share of Properties at Risk of Flooding as Percentile Nationwide, City of Mobile	21
Figure 5: Census Tracts Expected Building Loss Rate as a Percentile Nationwide, City of Mobile	22
Figure 6: R/ECAPs, City of Mobile.....	35
Figure 7: Social Vulnerability Index by Census Tract, City of Mobile.....	37
Figure 8: Sea-Level Rise Projections and Extrapolated Observations for Mobile, AL.....	43

Figure 9: The Mobile Bay Watershed and Associated Land Cover Types.....	44
Figure 10: Future Storm Surge Projections for City of Mobile with 1.6 ft of Sea-Level Rise	45
Figure 11: AEMA Division A Counties.....	47
Figure 12: Disaster Declarations for States and Counties (Mobile County)	50
Figure 13: Alabama Hurricane History (1852 - 2016).....	54
Figure 14: MID Recovery Zones Criteria Layer 1.....	60
Figure 15: MID Recovery Zones Criteria Layer 2.....	61
Figure 16: MID Recovery Zones Criteria Layer 3.....	62
Figure 17: MID Recovery Zones Criteria Layer 4.....	63
Figure 18: MID Recovery Zones Criteria Layer 5.....	64
Figure 19: MID Recovery Zones, City of Mobile.....	65

List of Tables

Table 1: ADECA Budget Allocation by Sector, City of Mobile.....	3
Table 2: Updated Unmet Needs and Proposed Budget Allocation by Sector, City of Mobile.....	4
Table 3: Type of Housing Stock, City of Mobile, 2017 to 2022.....	5
Table 4: Age of Housing Stock, City of Mobile 2022.....	6
Table 5: Age of Housing Stock for Occupied Housing, City of Mobile and Alabama, 2022.....	6
Table 6: Household Income in Last 12 months for Owner-Occupied Housing, City of Mobile, 2017 to 2022.....	7
Table 7: Household Income in Last 12 months for Renter-Occupied Housing, City of Mobile, 2017 to 2022.....	7
Table 8: Housing Costs as a Percentage of Household Income for Owner-Occupied Housing, City of Mobile, 2017 to 2022	8
Table 9: Housing Costs as a Percentage of Household Income for Renter-Occupied Housing, City of Mobile, 2017 to 2022	8
Table 10: FEMA IA Verified Loss for Owner-Occupied Units, City of Mobile.....	11
Table 11: FEMA IA Verified Loss for FEMA IA Tenant-Occupied Units, City of Mobile.....	11
Table 12: Pre-Disaster Owner and Rental Vacancy Rates, City of Mobile, 2017 to 2022.....	15
Table 13: Mobile Home Units, City of Mobile, 2017 to 2022	16

Table 14: High-Level Housing Unmet Need Calculation	17
Table 15: Average FEMA IA Verified Property Loss Values by HUD Damage Category.....	17
Table 16: Housing Unmet Needs Analysis.....	18
Table 17: Infrastructure Unmet Need by PA Category, City of Mobile	26
Table 18: Earnings in Past Year by Educational Attainment, City of Mobile, 2017 to 2022.....	27
Table 19: Unemployment Rate, City of Mobile, 2017 to 2022.....	27
Table 20: Industries by Employment, City of Mobile, 2017 to 2022	28
Table 21: SBA Application by Status	30
Table 22: SBA Business Loan Data	30
Table 23: Economic Unmet Need by Category.....	31
Table 24: Total Estimated Impact and Unmet Need	32
Table 25: Gender, City of Mobile, 2017 to 2022	33
Table 26: Family Status by Geography, City of Mobile, 2017 to 2022.....	33
Table 27: Place of Birth by Country, City of Mobile, 2017 to 2022.....	34
Table 28: Number of Census Tracts by SoVI Category, City of Mobile, 2020*	36
Table 29: Population by SoVI Category, City of Mobile, 2020	38
Table 30: Demographics, City of Mobile, 2022	38
Table 31: Income Demographics, City of Mobile, 2022	38
Table 32: Income Demographics – Low Income, City of Mobile, 2022.....	38
Table 33: LMI Analysis, City of Mobile, 2020	39
Table 34: Limited English Proficiency.....	39
Table 35: Point-in-Time County by Type of Shelter, Baldwin and Mobile County, 2022	40
Table 36: Diversity Index, Mobile County, 2020.....	40
Table 37: Income and Poverty Levels in the Past 12 Months, City of Mobile	40
Table 38: State-Wide LMI Analysis, City of Mobile, 2020.....	41
Table 39: LMI Analysis of Federally Declared Disaster Areas, City of Mobile.....	41
Table 40: Number of FEMA Applicants by LMI Category, City of Mobile, 2020.....	41
Table 41: Diversity Index, Mobile County, 2020.....	48

Table 42: Disaster Declaration Summary for Mobile County (Disaster declarations for states and counties. FEMA).....52

Table 43: Unmet Needs Breakdown by Recovery Sector, Mobile County and City of Mobile....67

Table 44: Unmet Needs Summary by Sector, Approved Budget Allocation by Sector, and Proposed Budget Allocation by Sector, City of Mobile 68

Table 45: Change in Mobile City Formula Allocation..... 68

Table 46: Low and Moderate Income (LMI) Limits, Mobile County, 202469

Table 47: HUD Required Affordability Requirements for Rental Units.....75

Table 48: City Hosted Public Hearings.....85

Table 49: Stakeholder Outreach, Names and Organization Type97

1 EXECUTIVE SUMMARY

1.1 OVERVIEW

Following Hurricanes Sally and Zeta in late 2020, the U.S. Department of Housing and Urban Development awarded Community development Block Grant – Disaster Recovery (CDBG-DR) funding to the State of Alabama. The Alabama Department of Economic and Community Affairs (ADECA) allocated \$53,149,037 to the City of Mobile, which was identified as a highly impacted and distressed area. These funds are intended to address the city’s unmet needs, fill funding gaps, and implement measures to mitigate future disaster risks.

To access the CDBG-DR allocation, Mobile must prepare and submit a Local Recovery Plan (LRP) to ADECA. The LRP must detail the programs the city intends to fund to address the assessed recovery and mitigation needs of the community.

1.2 DISASTER OVERVIEW

In late 2020, 35 counties throughout southern and central Alabama were hit by two different hurricanes. These Presidentially-declared disasters caused substantial damage to the state’s housing, buildings, and neighborhoods.

1.2.1 HURRICANE SALLY (DR-4563)

Hurricane Sally made landfall near Gulf Shores, AL on September 16, 2020, as a strong Category 2 hurricane. This slow-moving storm caused significant damage to power lines, trees and buildings. Many homes experienced damage to roofs, siding, and fences, with some older structures being destroyed. In downtown Mobile, numerous oak trees were damaged, and businesses sustained minor damage.

The storm produced maximum sustained winds of 105 mph and widespread storm surge across coastal Alabama. Heavy rainfall from Hurricane Sally deposited up to 30 inches of rain on southern Alabama, resulting in flash and river flooding that caused three deaths. The storm’s impact led to nearly \$311.9 million in damage to buildings and residences, infrastructure issues such as the overflow of about 12,000 gallons of sewage and significant crop destruction.

On September 17, 2020, Governor Kay Ivey requested an expedited major disaster declaration. This request included FEMA Individual Assistance for three counties, Public Assistance for three counties and the Poarch Band of Creek Indians, and Hazard Mitigation statewide.

1.2.2 HURRICANE ZETA (DR-4573)

Approximately five weeks after Hurricane Sally, the state was struck by Hurricane Zeta, which made a direct impact on downtown Mobile. Zeta, a fast-moving Category 2 storm, brought winds up to 110 mph and 2 to 5 inches of rain. The high winds caused numerous power poles, power lines and trees to fall. U.S. Highway 90 was completely flooded, and a section of Water Street in downtown Mobile was submerged due to storm surge. Many homes suffered structural damage and roof damage from the fallen trees. The storm traveled 1,300 miles in 24 hours, resulting in about 494,000 power outages, \$840 million in statewide damage, and six fatalities.

1.3 SUMMARY

ADECA's 2022 CDBG-DR Action Plan was approved by HUD on January 12, 2023, with a substantial amendment approved on July 21, 2023. The Action Plan and amendment provided notice the City of Mobile of the award of \$53,149,037 and established the Local Recovery Planning Program (LRPP). The City of Mobile, as a subrecipient to ADECA, must develop a Local Recovery Plan that will outline program approaches to assess and address unmet recovery and mitigation. This plan must meet ADECA's LRPP guidelines, as well as requirements for CDBG-DR funds set by HUD.

The recovery programs laid forth in this plan must:

- Be an eligible activity under HUD's CDBG-DR program and ADECA's LRPP Program Guidelines,
- Benefit low- and moderate-income individuals or households,
- Have a clear "tie-back" or relation to Hurricane Sally or Zeta and address direct or indirect disaster-related impacts, and
- Fill an unmet need within the disaster-impacted community.

In addition to the ADECA program guidelines for the Local Recovery Plan at a state level, these CDBG-DR funds are also guided by federal requirements posted in the February 3, 2022 ([87 FR 6364](#)) and May 24, 2022 ([87 FR 31636](#)) Federal Register notices for Public Law 117-43, which addressed 2020 disasters.

The City of Mobile prepared the Local Recovery Plan to outline how CDBG-DR funds will be used to address the city's remaining recovery needs while adhering to federal, state, and local regulations. This plan's programs were designed with consideration for community needs, the City's capacity to implement, and the timeline of ADECA's award.

To assess the city's unmet recovery needs following the 2020 disasters, the City analyzed data from federal, state, and local sources. This included information on individuals who applied for assistance from the Federal Emergency Management Agency (FEMA) and businesses that sought aid from the Small Business Administration (SBA). This data helped identify remaining needs in the housing and infrastructure sectors. The City also gathered community feedback

through public meetings and a charette to better understand the immediate impacts of the storms, how they were initially addressed, and what ongoing needs and challenges exist.

The City of Mobile has a total unmet need of \$497,235,375 from Hurricanes Sally and Zeta. The Local Recovery Plan’s proposed programs and distribution methods aim to address these needs in both housing and infrastructure by maximizing the impact of the allocated funds.

These programs will be administered by the City of Mobile, with allocations designed to address as much of the unmet recovery need as possible. Priority will be given to the areas and populations most affected by the disaster to support recovery and build resilience against future disasters.

1.4 UNMET NEEDS AND PROPOSED ALLOCATION

The CDBG-DR program defines unmet needs as the recovery needs that persist after other recovery resources have been exhausted. CDBG-DR funds are intended to supplement and fill the gaps of other funding sources. This analysis includes disaster loss and assistance data from federal sources, as well as local data from city departments, local jurisdictions, and community-based organizations to supplement the state’s unmet needs analysis.

ADECA’s unmet needs assessment in its 2022 CDBG-DR Action Plan provided an allocation between housing and non-housing sectors for the City of Mobile reflected in Table 1 below.

Through the LRP process, the City of Mobile conducted its own needs assessment to better understand the remaining local need. This unmet needs analysis, along with an evaluation of future disaster risks, informed the city’s proposed revised budget allocation in Table 2 below.

Table 1: ADECA Budget Allocation by Sector, City of Mobile

Sector	ADECA Allocation	% of Total Budget
Housing	\$23,557,014	44.30%
Non-Housing	\$29,592,023	55.70%
Total	\$53,149,037	100.00%

Source: ADECA 2020 Action Plan

Table 2: Updated Unmet Needs and Proposed Budget Allocation by Sector, City of Mobile

Sector	Updated Unmet Needs	% of Unmet Needs	Proposed Allocation	% of Total Budget
Housing	\$461,525,804	92.80%	\$32,334,137	60.8%
Infrastructure	\$5,189,004	1.10%	\$20,814,900	39.2%
Economic Revitalization	\$30,519,767	6.10%	\$0	0.0%
Total	\$497,235,375	100.00%	\$53,149,037	100.0%

Source: FEMA IA (2024); FEMA PA (2024); SBA (2024)

2 DISASTER IMPACTS

2.1 HOUSING

2.1.1 PRE-DISASTER HOUSING CONDITIONS

Using the 2023 Analysis of Impediments and the American Community Survey 5-Year Estimates, this section will provide an overview of housing stock availability, affordability, and conditions prior to the storms. Table 3 shows that Mobile’s housing stock is primarily one-unit, single-family housing (68 percent). Between 2017 and 2022, Mobile lost more than 1,000 two-unit dwellings. The number of units in smaller apartment buildings (3-to-9 units) has remained roughly the same, while there has been an increase of about 2,300 units in larger apartment buildings (10-to-19 units). This indicates that older “missing middle” housing is likely being demolished while large apartment buildings are being built. Missing Middle is a term used to describe the range of housing density between a “single-family detached home and a mid-rise apartment building” that was prevalent in the early twentieth century but has been made difficult to construct and maintain in most American cities due to private market demand and land use regulations that have evolved over time.¹

Table 3: Type of Housing Stock, City of Mobile, 2017 to 2022

	2017		2022	
	Number	Percent	Number	Percent
Total housing units	91,601	100%	89,855	100%
1-unit, detached	62,199	67.9%	61,195	68.1%
1-unit, attached	1,222	1.3%	1,175	1.3%
2 units	2,767	3.0%	1,710	1.9%
3 or 4 units	4,101	4.5%	3,951	4.4%
5 to 9 units	7,217	7.9%	6,389	7.1%
10 to 19 units	5,929	6.5%	8,283	9.2%
20 or more units	6,754	7.4%	6,066	6.8%
Mobile home	1,402	1.5%	950	1.1%
Boat, RV, van, etc.	10	0.0%	136	0.2%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Approximately 68 percent of the housing stock was built before 1980 (Table 4) which suggests that there is a need for structural rehabilitation and lead mitigation for both owner-occupied and rental households. There have been multiple news reports of apartments with mold and

¹ Planetizen. “What is Missing Middle Housing?”. Available at: <https://www.planetizen.com/definition/missing-middle-housing>

lack of clarity around resources for tenants to repair and remediate the issues^{2,3}. Mobile's housing stock is aging, as only 11.1 percent of the current housing stock was built after 2000. In comparing the age of housing stock of only occupied housing in the City of Mobile to the state of Alabama (Table 5), the city has significantly older housing with 63.5 percent of housing built prior to 1979 compared to a statewide average of 41.8 percent of housing built prior to 1979.

Table 4: Age of Housing Stock, City of Mobile 2022

Year Structure Built	2022	
	Number	Percent
Total housing units	90,922	100%
Built 2020 or later	135	0.1%
Built 2010 to 2019	3,795	4.2%
Built 2000 to 2009	6,614	6.8%
Built 1990 to 1999	6,869	7.6%
Built 1980 to 1989	14,646	16.1%
Built 1970 to 1979	20,637	22.7%
Built 1960 to 1969	14,319	15.7%
Built 1950 to 1959	12,862	14.1%
Built 1940 to 1949	6,550	7.2%
Built 1939 or earlier	4,945	5.4%

Source: American Community Survey, 5-Year Estimates 2022

Table 5: Age of Housing Stock for Occupied Housing, City of Mobile and Alabama, 2022

Year Structure Built	City of Mobile		Alabama	
	Number	Percent	Number	Percent
Total Housing Units	77,844	100%	1,933,150	100%
2020 or later	135	0.2%	12,547	0.6%
2010 to 2019	3,357	4.3%	194,270	10.0%
2000 to 2009	5,486	7.0%	307,773	15.9%
1980 to 1999	19,447	25.0%	610,413	31.6%
1960 to 1979	29,651	38.1%	511,705	26.5%
1940 to 1959	15,342	19.7%	211,732	11.0%
1939 or earlier	4,426	5.7%	84,710	4.4%

Source: American Community Survey, 5-Year Estimates (2022)

In 2022, the City of Mobile had 38,420 renter-occupied units (49 percent of all occupied units) and 39,424 owner-occupied units (51 percent). Renter-occupied households were more low-

2 NBC15 News (2022). Student says mold problem at Central House Apartment has become health risk. Available at: <https://mynbc15.com/news/local/usa-student-says-mold-problem-at-central-house-apartment-has-become-health-risk>

3 NBC15 News (2022). Reality Check report results in city inspection at Mobile apartment. Available at: <https://mynbc15.com/news/local/mold-dirty-water-leaks-mother-says-issues-have-persisted-for-months-at-local-townhome>

income than owner-occupied housing units. In 2022, 47 percent of all owner-occupied households made more than \$75,000 (Table 6), while 15.9% of all renter-occupied households made more than \$75,000 (Table 7). At the same time, both renter- and owner-occupied households have seen an increase in income with both groups showing a decrease in households making less than \$20,000 and an increase in households making more than \$75,000.

Table 6: Household Income in Last 12 months for Owner-Occupied Housing, City of Mobile, 2017 to 2022

	2017	2022	Change 2017 to 2022
Less than \$20,000:	13.4%	9.4%	-4.0%
\$20,000 to \$34,999:	15.7%	10.7%	-5.0%
\$35,000 to \$49,999:	13.3%	13.5%	0.2%
\$50,000 to \$74,999:	19.8%	18.6%	-1.2%
\$75,000 or more:	36.5%	47.0%	10.5%
Zero or negative income	1.3%	0.8%	-0.5%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Table 7: Household Income in Last 12 months for Renter-Occupied Housing, City of Mobile, 2017 to 2022

	2017	2022	Change 2017 to 2022
Less than \$20,000:	35.7%	25.8%	-9.9%
\$20,000 to \$34,999:	19.7%	19.5%	-0.2%
\$35,000 to \$49,999:	13.0%	13.6%	0.5%
\$50,000 to \$74,999:	10.5%	13.7%	3.2%
\$75,000 or more:	10.5%	15.9%	5.4%
Zero or negative income	4.6%	3.8%	-0.8%
No cash rent	5.9%	7.8%	1.8%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Similarly, renter-occupied households were significantly more likely to be housing cost burdened than owner-occupied households when housing cost burden is measured as housing costs which exceed 30 percent of annual household income. In 2022, 22 percent of

owner-occupied households were housing cost burdened (Table 8) while 55 percent of renter occupied households were housing cost burdened (Table 9).

Figure 1 shows that many of the census tracts along the coast are in top 90th percentile of census tracts with the highest cost burden nationwide⁴. Cost-burdened households are especially vulnerable to financial shocks and often experience increased likelihood of missing a rent or mortgage payments due to a missed paycheck or unexpected expense⁵.

Table 8: Housing Costs as a Percentage of Household Income for Owner-Occupied Housing, City of Mobile, 2017 to 2022

	2017		2022	
Less than 20 percent	23,535	56%	23,649	60%
20 to 29 percent	8,197	20%	6,695	17%
30 percent or more	10,056	24%	8,764	22%
Total owner-occupied households	41,788		39,424	

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Table 9: Housing Costs as a Percentage of Household Income for Renter-Occupied Housing, City of Mobile, 2017 to 2022

	2017		2022	
Less than 20 percent	6,461	21%	8,427	25%
20 to 29 percent	6,807	23%	6,739	20%
30 percent or more	16,910	56%	18,796	55%
Zero or negative income	1,561	5%	1,472	4%
No cash rent	2,001	6%	2,986	8%
Total renter-occupied households	33,740		38,420	

Source: American Community Survey, 5-Year Estimates (2017, 2022)

The U.S. Department of Housing and Urban Development (HUD) requires recipients of federal funding to design local programs and housing policy in a way that furthers fair housing goals and reduces the barriers or impediments that limit fair housing choice. The HUD Fair Housing Planning Guide defines impediments to fair housing choice as: “Actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choices or the availability of housing choices”⁶. Impediments are an identified matter that directly or indirectly creates a barrier to fair housing choice and has a disproportionate effect on a protected class⁷. Effective fair housing policies can help reduce

⁴ Climate and Economic Justice Screening Tool. Available at: <https://screeningtool.geoplatform.gov/en/downloads>

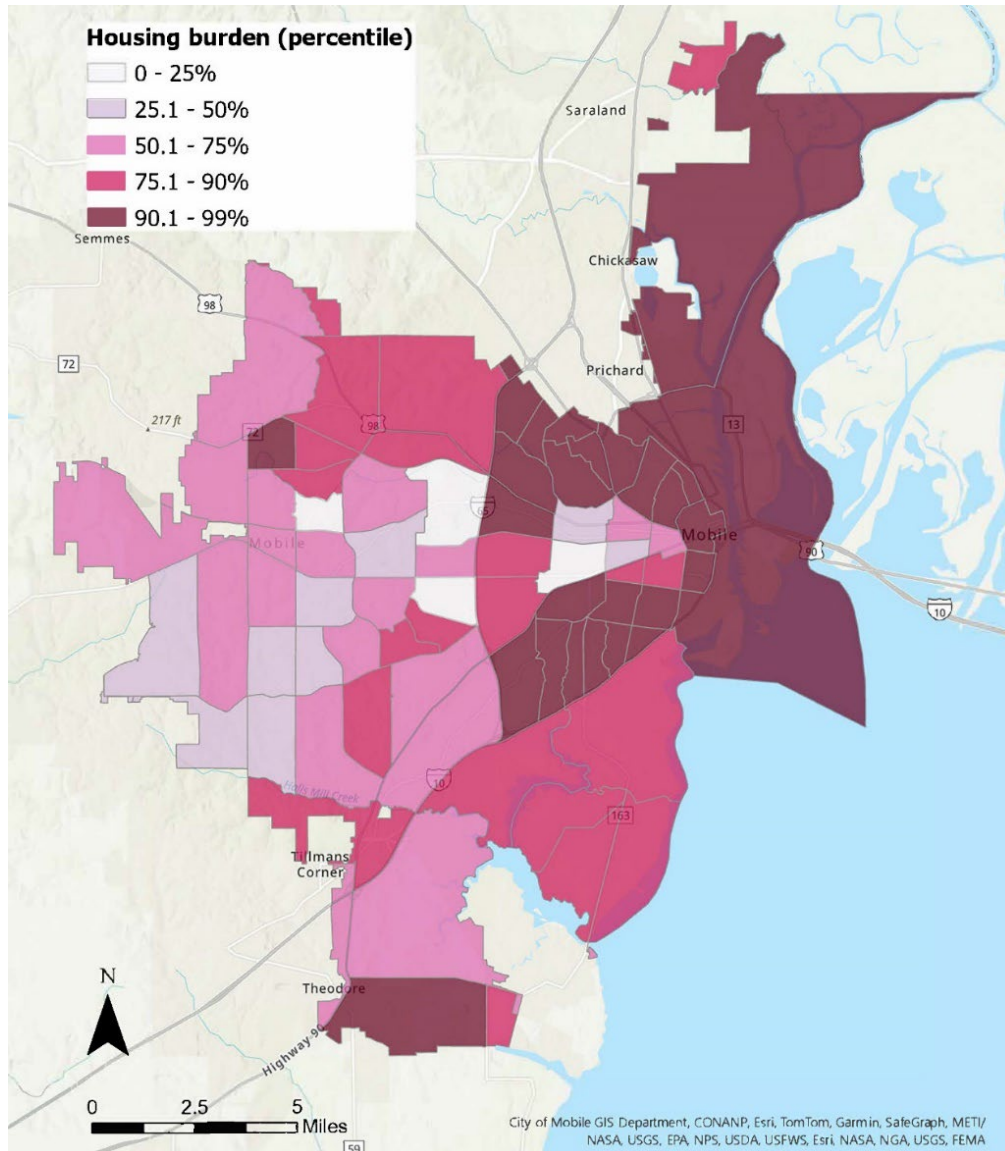
⁵ National Low Income Housing Coalition (2024). The Gap: A Shortage of Affordable Homes. Available at: https://nlihc.org/sites/default/files/gap/2024/Gap-Report_2024.pdf

⁶ HUD. Fair Housing Equal Opportunity for All Booklet. Available at: https://www.hud.gov/sites/documents/FHEO_BOOKLET_ENG.PDF

⁷ HUD. Fair Housing Planning Guide, Vol. 1. Available at: <https://www.hud.gov/sites/documents/FHPG.PDF>

cost burden by increasing access to affordable housing options and ensure that discrimination does not exacerbate financial pressure on vulnerable populations.

Figure 1: Census Tracts by Housing Burden National Percentile, City of Mobile



Source: Climate and Economic Justice Screening Tool

The City of Mobile, an entitlement community, receives annual Community Development Block Grant (CDBG) funding from HUD based on a formula that considers factors such as

population, poverty levels, housing overcrowding, housing age, and population growth lag⁸. As an entitlement community, the City of Mobile is required to complete an Analysis of Impediments to Fair Housing Choice approximately every five years. The most recent analysis, released in 2023, identified the following top impediments to fair housing choice in the city:

1. **Lack of Access to Affordable Housing** – Low-income households struggle to find affordable housing that does not impose a cost burden. Public and subsidized housing is in short supply, and plans are in place to demolish three additional public housing developments.
2. **Aging and Deteriorating Housing Stock**– Predominantly Black or African American households have seen a lack of private and public investment leading increased deterioration and abandonment of properties.
3. **Lack of Accessible Housing** – The stock of housing suitable for the 11,029 Mobile residents with independent living difficulties is limited, and there is inadequate assistance for making housing accessibility modifications.
4. **Geographic Segregation and Unequal Access to Opportunities** – Communities of color in Mobile face lower wages, limited access to reliable transit, and inadequate educational opportunities, affecting housing stability, social mobility, and increasing the risk of displacement.
5. **Home Lending Disparities**– Federally protected classes encounter challenges in accessing home lending opportunities and may face discrimination in the private market, which limits their ability to achieve homeownership and build long-term wealth.
6. **Restrictive Local Land Use Regulations** – The prevalence of single-family zoning throughout the city may limit the type and availability of housing in higher- opportunity neighborhoods.
7. **Exposure to Environmental Hazards** – The city’s older housing stock increases residents’ exposure to environmental health hazards such as lead, poor air quality, and vulnerability to flood events.⁹

To address these impediments, the report includes several key recommendations, some of which are particularly relevant to unmet housing needs and proposed programming. These recommendations include:

- **Coordinate with the Mobile Housing Authority:** Develop a relocation plan for tenants affected by the demolition or rehabilitation of public housing and ensure outreach and access to this plan.

⁸ HUD. CDBG Entitlement Program. Available at: https://www.hud.gov/program_offices/comm_planning/cdbg/entitlement-program

⁹ City of Mobile (2023). Analysis of Impediments to Fair Housing Choice. Available at: <https://www.cityofmobile.org/uploads/240318041121CityofMobile-AIFinalDraft-050123.pdf>

- **Leverage funding for affordable housing:** Explore opportunities to use funding to support the creation of affordable housing.
- **Expand home repair efforts:** Utilize all available funding sources to enhance home repair initiatives.
- **Strengthen building code standards:** Improve building codes to set appropriate development and rebuilding standards in high flood-risk areas.

All programs proposed in this Local Recovery Plan using CDBG-DR funds will comply with all CDBG-DR requirements and address recognized impediments to fair housing choice as mandated by the Fair Housing Act.

2.1.2 DISASTER IMPACTS ON HOUSING

2.1.2.1 Single Family v. Multi-Family; Owner Occupied v. Tenant

There were 13,155 Federal Emergency Management Agency Individual Assistance (FEMA IA) applicants for owner-occupied units following Hurricanes Sally and Zeta. The average FEMA Real Property Verified Loss for these applicants was \$5,188 (Table 10).

Table 10: FEMA IA Verified Loss for Owner-Occupied Units, City of Mobile

# of Applicants	# of Inspections	# Units Inspected with Damage	# Repair or Replacement Assistance Received	Total FEMA RP Verified Loss	Average FEMA RP Verified Loss
13,155	6,544	5,345	3,167	\$27,728,451	\$5,188

Source: FEMA IA

In contrast, the City of Mobile saw a significantly higher number of renter applicants. Out of 25,579 renter applicants, 9,902 applicants received Personal Property Assistance from FEMA (Table 11). The average FEMA Personal Property Verified Loss for renters was \$2,130.

Table 11: FEMA IA Verified Loss for FEMA IA Tenant-Occupied Units, City of Mobile

# of Applicants	# of Inspections	# Inspected with Damage	# Personal Property Assistance Received	Total FEMA PP Verified Loss	Average FEMA Verified Loss
25,579	18,155	14,362	9,902	\$30,593,336	\$2,130

Source: FEMA IA

FEMA IA applicants from Hurricanes Zeta and Sally were distributed throughout the city, with a higher concentration of applications coming from census tracts in the northern and central areas of the city.

This assessment uses HUD damage categories for owner-occupied and renter-occupied units applying for FEMA IA. The categories for damage to owner-occupied units are as follows:

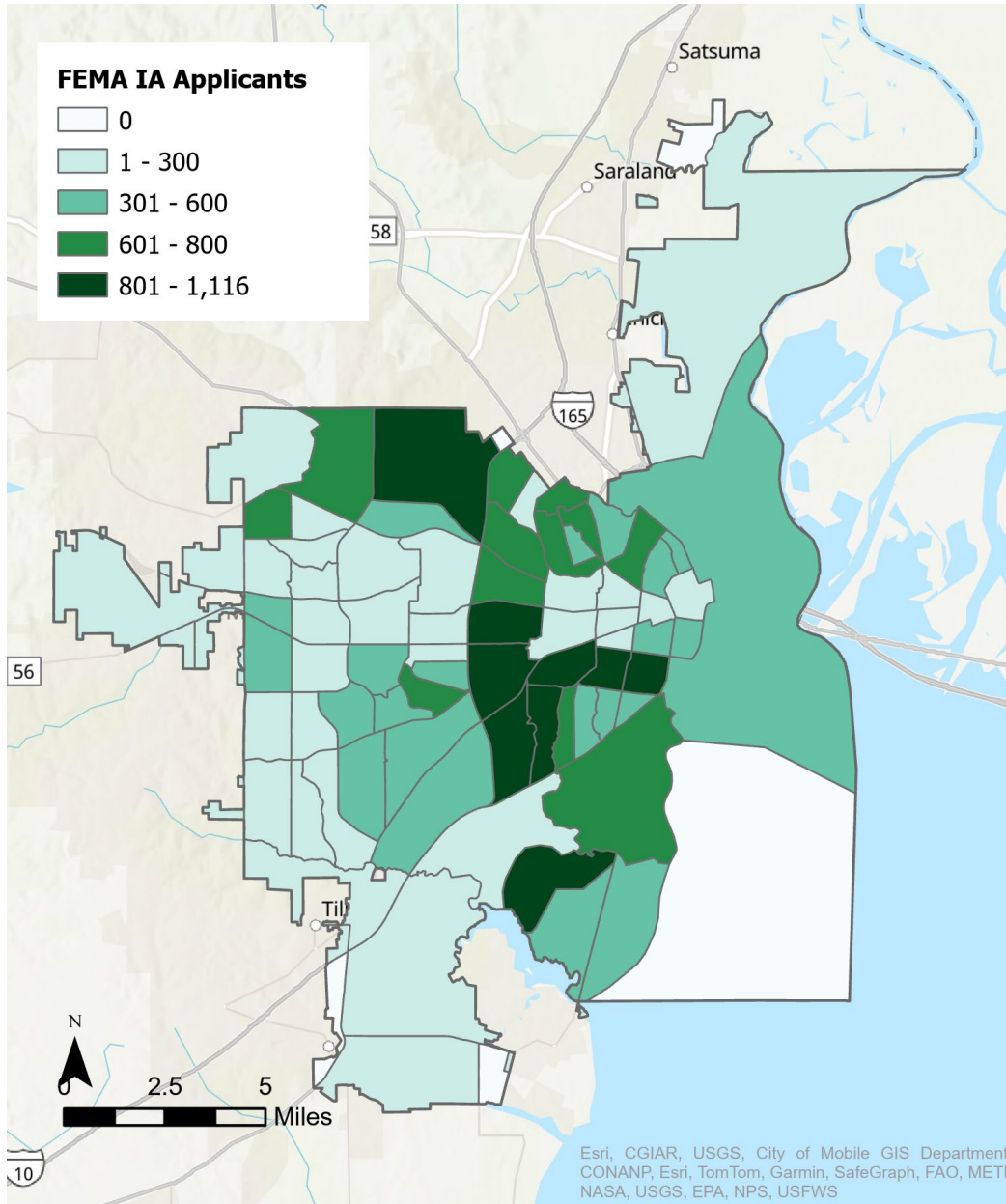
- **Minor-Low:** Less than \$3,000 of FEMA inspected real property damage
- **Minor-High:** \$3,000 to \$7,999 of FEMA inspected real property damage
- **Major-Low:** \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor
- **Major-High:** \$15,000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

The categories for damage to renter-occupied units are:

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

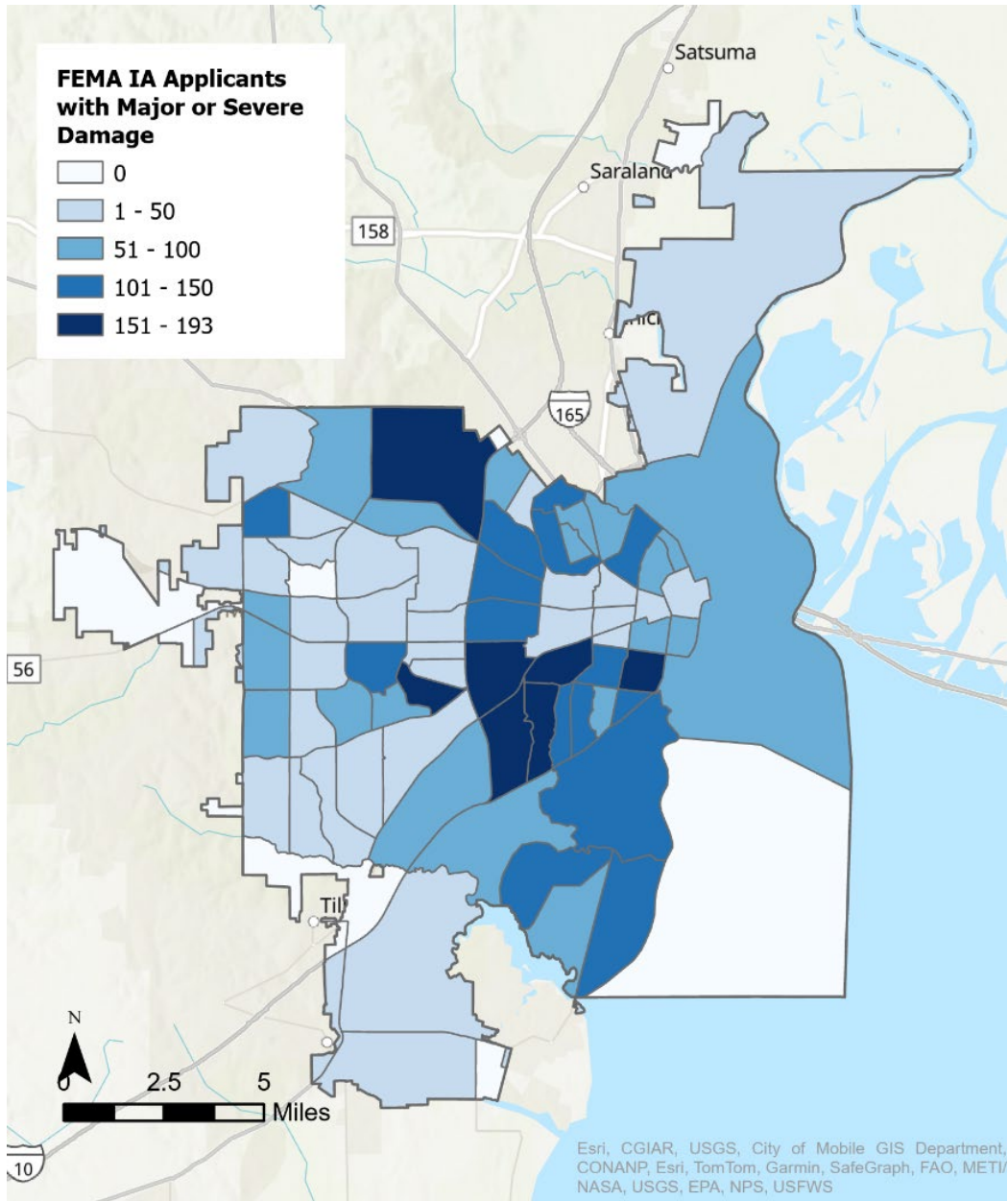
Figure 3 shows the number of FEMA IA applicants with major or severe damage in the City of Mobile for Hurricanes Sally and Zeta. Census tracts with more FEMA IA registrants with Major-Low, Major-High, or Severe damage were in the north and central portions of the city, particularly along the coast.

Figure 2: FEMA IA Registrants by Census Tract, City of Mobile



Source: FEMA IA, ArcGIS

Figure 3: FEMA IA Registrants with Major or Severe Damage, City of Mobile



Source: FEMA IA, ArcGIS

2.1.2.2 Public Housing and Affordable Housing

The Mobile Housing Authority (MHA) operates 1,363 public housing units and assists 3,544 households through the Housing Choice Voucher Program. The average annual income of residents served by the MHA is \$13,936 for public housing and \$14,242 for Housing Choice Vouchers. Both these figures are lower than the 2023 very-low-income limit of \$27,650 for a two-person household in the Mobile HUD Metro FMR Area¹⁰.

The Mobile Housing Authority has plans to demolish three public housing developments by 2026 due to poor conditions of the properties. This will reduce the stock of public housing units by 50 percent, further limiting access to affordable rental units¹¹.

From 2017 to 2022, both the owner vacancy rate and the rental vacancy rate declined (Table 12). In 2022, the owner vacancy rate was 1.4 percent, down from 3.0 percent in 2017, while the rental vacancy rate was 5.0 percent, down from 11.9 percent in 2017. The rental vacancy rate continues to be higher than the owner vacancy rate. According to the Census, vacancies are defined as a point-in-time count of unoccupied units on April 1st of every year as either a sample or full inventory. As such, vacancies can include “unoccupied secondary homes and rentals, abandoned or foreclosed homes, seasonal migrants’ quarters, and investment properties, in addition to empty homes that are for sale”.¹² According to the American Community Survey 1-Year estimates for 2021 data, Mobile has 10,516 vacant units or 14.2 percent of all housing units. The majority (86 percent) of respondents to an online public survey that took place in February 2023 stated that abandoned and/or foreclosed properties are a critical issue in the city.

Table 12: Pre-Disaster Owner and Rental Vacancy Rates, City of Mobile, 2017 to 2022

	% Owner Occupied Units	Owner Vacancy Rate	Renter Vacancy Rate
2017	55.7%	3.0%	11.9%
2022	50.6%	1.4%	5.0%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Manufactured housing, or mobile homes, are only allowed by conditional use permit in certain residential zoning districts in Mobile, and thus only represented 1.5 percent of the total housing stock in the city in 2017 (Table 13). By 2022 that percentage had dropped to 1 percent. While mobile homes represent a very small portion of the housing stock in the city, 70 percent of

¹⁰ HUD User (2023). FY 2023 Income Limits Documentation System. Available online at: https://www.huduser.gov/portal/datasets/il/il2023/select_Geography.odn.

¹¹ City of Mobile (2023). Analysis of Impediments to Fair Housing Choice. Available at: <https://www.cityofmobile.org/uploads/240318041121CityofMobile-AIFinalDraft-050123.pdf>

¹² The New York Times (2022). “Vacant Homes Everywhere”. Available at: <https://www.nytimes.com/2022/03/10/realestate/vacancy-rate-by-state.html>

households residing in mobile homes submitted FEMA IA applications, highlighting the vulnerabilities of mobile homes in a weather event.

Table 13: Mobile Home Units, City of Mobile, 2017 to 2022

	Total Housing Units	Mobile Homes	% of Housing Units that are Mobile Homes	FEMA IA Applications from Mobile Homes	FEMA IA Applications from Mobile Homes as a % of Mobile Home Total
2017	91,601	1,402	1.5%	N/A	N/A
2022	90,922	1,218	1%	852	70%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

2.1.3 HOUSING UNMET NEEDS METHODOLOGY

This assessment evaluates the unmet housing need in the City of Mobile resulting from the recent disasters. Modeled on the unmet needs assessment in the Community Development CDBG-DR Action Plan from the ADECA, it utilizes disaster damage and payment data from FEMA IA and the U.S. Small Business Administration (SBA), along with information from the U.S. Census American Community Survey, Zillow property data, HUD, and National Flood Insurance Program (NFIP) building payments. The assessment estimates total housing loss, support received, and remaining housing needs, with a particular focus on impacts to renter-occupied properties, as owner-occupied properties are addressed through ADECA CDBG-DR housing programs.¹³

HUD calculates unmet housing needs as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. This assessment uses the following variables to calculate housing unmet need:

Housing loss:

- FEMA IA applicants for renter-occupied units by HUD damage categories
- Average SBA real estate loss by HUD damage categories
- Estimated additional damage to FEMA IA renter applicants without FEMA verified loss
- Estimated damage to disaster survivors who did not apply for FEMA IA
- Damage to rental properties and homeowners associations from SBA

¹³ ADECA (2020). CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>.

Housing support:

- FEMA payments to repair homes
- SBA loan amounts
- Estimated NFIP building payments
- Payments to rental properties from SBA

Table 14 provides a high-level summary of the City of Mobile’s unmet housing needs using the unmet needs calculation in ADECA’s action plan. The estimates are calculated using FEMA IA and SBA home data. From there, 15 percent is added to the initial impact estimate to account for resilience costs, for a total unmet housing needs estimate of \$ 461.5 million.

Table 14: High-Level Housing Unmet Need Calculation

Formula	Amount
[A] Amount of Initial Estimated Impact	\$421,147,170
[B] 15% Resilience Costs	\$63,172,075
[C] Total Estimated Impact = [A] + [B]	\$484,319,245
[D] Amount of Funds Available from Other Sources	\$22,793,441
Unmet Needs = [C] – [D]	\$461,525,804

Source: FEMA IA (2020); SBA (2020); Zillow (2024)

Table 15 compares estimated losses for owners and renters under different severity levels of property damage. Owners consistently face higher losses compared to renters, reflecting the greater value of real property compared to personal property. The ratio of losses between owners and renters varies across severity levels, with owners typically facing a greater magnitude of loss increase as severity escalates.

Table 15: Average FEMA IA Verified Property Loss Values by HUD Damage Category

	Owner Real Property Loss	Renter Personal Property Loss
Minor-Low	\$1,445	\$551
Minor-High	\$5,012	\$1,435
Major-Low	\$12,030	\$2,820
Major-High	\$16,253	\$5,360
Severe	\$35,857	\$8,950

Source: FEMA IA

To account for reconstruction costs for units with major or severe damage, this analysis uses Zillow property data for single-family homes.

Table 16: City of Mobile Data Utilized in this Housing Impact and Unmet Needs Assessment

	Zillow Single Family Home Value	66% of Zillow Single Family Home Value	Total FEMA IA Applicants	Total Renter-Occupied Housing Units	% SBA Applications without FEMA ID
2020	\$139,195	\$91,868	38,734	37,633	11%
2022	\$176,033	\$116,182	-	38,420	-
March 2024	\$188,344	\$124,307	-	-	-

Source: FEMA IA, Zillow Home Value Index, American Community Survey, 5-Year Estimates

Further, to account for damage among those who did not apply for FEMA IA assistance, this analysis subtracts FEMA IA applicants from the total number of renter-occupied housing units in the city.

2.1.4 HOUSING UNMET NEEDS ANALYSIS

Table 17 provides an overview of the housing unmet needs analysis. The analysis focused on renter-occupied properties for which data was available. To determine the unmet needs for renters in the city, the table below uses FEMA IA data and Average Real Loss of property determined by SBA housing data. The estimated total unmet housing need is \$461,525,804.

Table 16: Housing Unmet Needs Analysis

	Data	Data Detail	FEMA IA Applicants (Renters)	Average Real Loss	Estimated Total Loss/Support
A	Minor-Low Damage to FEMA IA Applicants	Real property (repair) losses from SBA for applicants with FEMA Minor-Low damage	5,155	\$1,815	\$9,354,073
B	Minor-High Damage to FEMA IA Applicants	Estimate of losses for FEMA applicants with FEMA Minor-High damage	3,695	\$5,558	\$20,538,427
C	Major-Low Damage to FEMA IA Applicants	Applicants with at least Major-Low FEMA Verified Losses	3,348	\$11,377	\$38,091,662
D	Major-High or Severe Damage to FEMA IA Home Applicants	# of applicants with Major-High or Severe damage multiplied by	2,164	\$124,307	\$269,000,348
E	Major-High or Severe Damage to FEMA IA "Other" Applicants	Non-house FEMA IA Applicants with major-high or severe damage	0	-	0

	Data	Data Detail	FEMA IA Applicants (Renters)	Average Real Loss	Estimated Total Loss/Support
F	Estimated Additional Damage to Applicants without PPFVL (Personal Property FEMA Verified Loss)	Estimate of damage to all FEMA applicants for which an inspection did not take place or for which no damages were found.	11,217	\$1,815	\$20,353,954
G	Estimated Additional Damage to Disaster Survivors Who Did Not Apply for FEMA IA	Total FEMA applicant population (Rows A-F) subtracted from the total number of renter-occupied housing units in each county	12,841	\$1,815	\$23,300,805
H	Estimated Damage to Public Housing	Lacking sufficient data	-	-	0
I	Damage to Rental Properties (Landlords)	Per SBA Business Data	-	-	\$40,507,901
J	Total Housing Loss	The sum total of loss from each line (A-J) total housing losses	-	-	\$421,147,170
K	Total Housing Loss plus 15% additional for Resilience	Total housing loss value was multiplied by 15% to account for increased cost of compliance and additional building materials necessary to move toward a more resilient society.	-	-	\$484,319,245
L	FEMA Payments to Repair Homes	-	-	-	\$20,002,461
M	Estimated NFIP Building Payments	-	-	-	0
N	Public Housing Funds	-	-	-	0
O	Payments (Loans) to Rental Properties (Landlords)	Per SBA Business Data	-	-	\$2,790,980
P	Total Support	-	-	-	\$22,793,441
Q	Initial Unmet Needs	-	-	-	\$398,353,729
R	Total Unmet Housing Need plus additional 15% for resilience	Total housing loss plus 15% for resilience, accounting to available recovery resources	-	-	\$461,525,804

Source: FEMA IA (2020); SBA (2020); Zillow (2024); American Community Survey (2022)

2.2 INFRASTRUCTURE

This section provides an overview of the infrastructure pre-disaster conditions, disaster impacts, and unmet needs resulting from Hurricanes Sally and Zeta.

2.2.1 PRE-DISASTER CONDITIONS

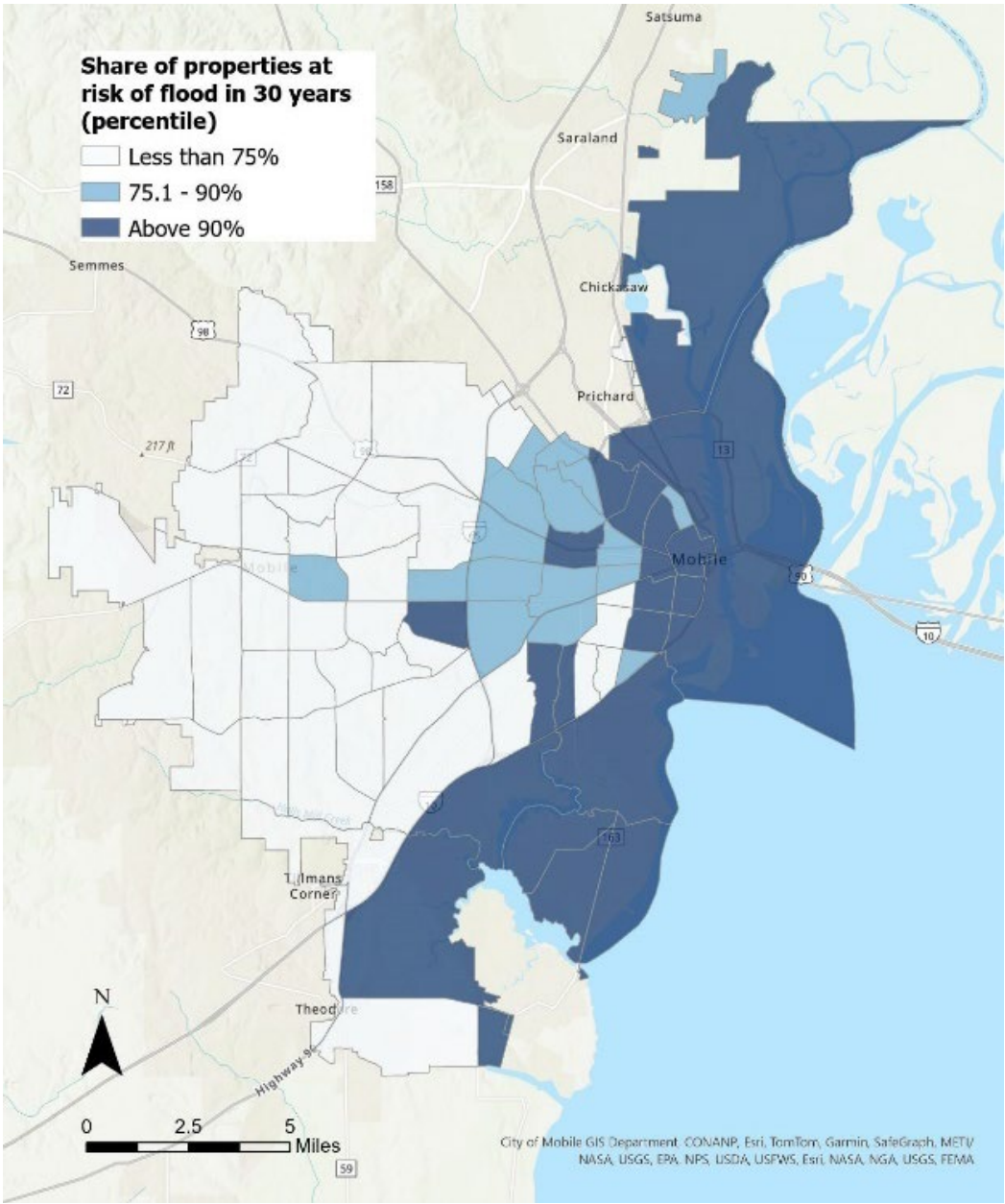
The Mobile County Hazard Mitigation Plan outlines the City of Mobile's vulnerabilities which include high vulnerability to flooding and some vulnerability to storm surges. There are many critical facilities located within the 100-year floodplain, including schools, emergency services, and government buildings. Similarly, there are 660 repetitive loss properties in the City, with a high amount of residential, multi-family homes, nonresidential, and condominiums. Repetitive loss structures are defined as those which have two or more losses of at least \$1,000 and have been paid under the National Flood Insurance Program (NFIP). Mobile also has some vulnerability to tidal surges with over thirty critical facilities vulnerable to storm surge and/or flooding, including City Hall, the Alabama State Docks, the Civic Center, municipal buildings, the jail, six schools, and various federal buildings, including the US Congressional Office, US District Court, and US Postal Service.¹⁴

Figure 4 shows that the eastern portion of the city around the coast has a flood risk which is largely above the 90th percentile for the country.

Figure 5 shows that the entire city has an estimated building loss rate – the economic loss to building value resulting from natural hazards each year – which is in the 96th to 97th percentile for the country.

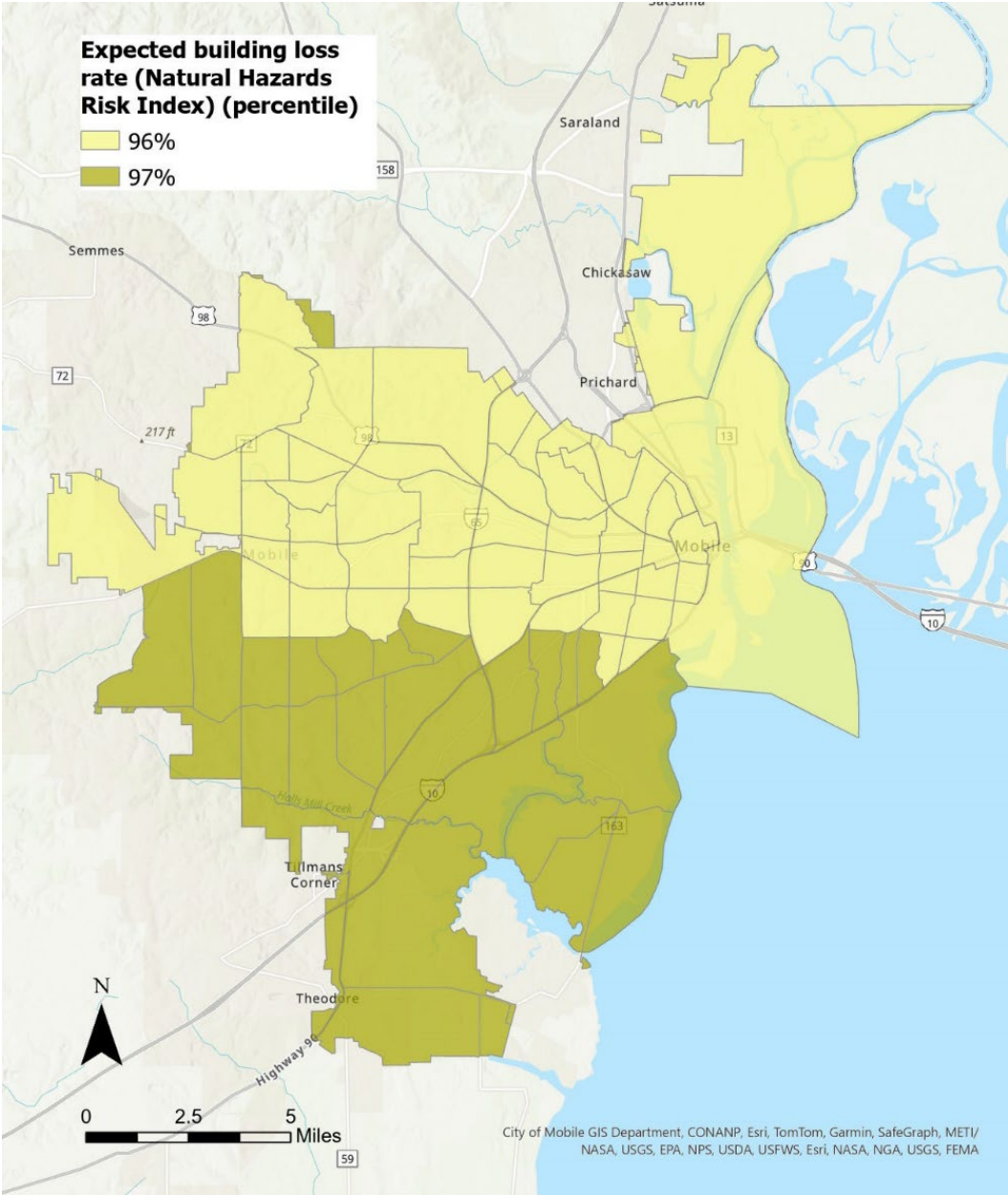
¹⁴ Mobile County (2016). Hazard Mitigation Plan: Integrating Mitigation Measures into Local Planning. Available at: <https://ema.alabama.gov/wp-content/uploads/2017/01/mobilecountycompleteplan.pdf>

Figure 4: Census Tracts Share of Properties at Risk of Flooding as Percentile Nationwide, City of Mobile



Source: Climate and Economic Justice Screening Tool

Figure 5: Census Tracts Expected Building Loss Rate as a Percentile Nationwide, City of Mobile



Source: Climate and Economic Justice Screening Tool

Water in Mobile is managed by the Mobile Area Water and Sewer System (MAWSS) for drinking water and wastewater and the City of Mobile for stormwater. MAWSS delivers 41 million of freshwater daily using surface water through two water treatment plants. There are some challenges with aging distribution lines which can cause leakage and system strain. Mobile's wastewater is processed through the CC Williams Wastewater Treatment Plant which was constructed in 1957 and upgraded last in 1996 and the Wright Smith Jr. Wastewater Treatment plant which was built in 1947 and last upgraded in 1987. Wastewater faces challenges from age of treatment lines, lack of tax revenue due to MAWSS operating separately from Mobile County and City of Mobile, and potential sewage spills.¹⁵

Transportation in Mobile includes two major interstate corridors (I-10 and I-65), the Mobile International Airport and Mobile regional airport, a railway system, and a network of sidewalks, bike lanes, and greenways. The Wave Transit system operates a bus system throughout the city. Mobile is the only city in Alabama with a seaport, The Port of Mobile, and is a pivotal connection for cargo bound to statewide factories and manufacturing. The comprehensive transportation system is critical for essential service distribution and economic activity not only within the city but also around the state and region. The largest threats to the transportation system include 44 miles of road exposed to major coastal storms and bridges which are susceptible to flood damage. Notably, the Bayway, an essential arterial and key for evacuation, is not currently tall enough to withstand a 100-year storm surge.¹⁶

Communications systems in Mobile include multiple private entities. Mobile currently has 600 miles of fiber, making it one of the most extensive fiber networks in the region. At the same time, many residents and businesses in Mobile do not have access to high-speed internet with many census tracts throughout the city having less than 25% of households with broadband access.¹⁷

In 2023, stakeholder groups surveyed for the Mobile City-Wide Resilience Assessment listed aging infrastructure as the greatest source of chronic stress in the city.¹⁸ The City of Mobile capital improvements are funded by a one-cent sales tax, colloquially known as the penny tax, which was established in 2016 due to a finding of \$250 million in infrastructure maintenance need. The penny tax currently provides about \$21 million a year for the repair, replacement, and rebuilding of city infrastructure.¹⁹

The City of Mobile's Capital Improvement Plan, last updated in 2024, outlines City-led construction and infrastructure projects for the next five years. Partially funded by the penny tax, the plan outlines \$231 million in planned projects focused on transportation, parks and greenways, environmental protection, and city facilities. Notable projects include roadway resurfacing and construction, drainage improvements, parks and recreation improvement and new greenway trails, a citywide tree inventory, ditch repairs, sidewalk repair, street lighting

15 City of Mobile (2023). City-wide Resilience Assessment. Available at: <https://www.cityofmobile.org/public-works/uploads/102907MobileResilienceAssessmentDec2023FINAL.pdf>

16 Ibid.

17 Ibid.

18 Ibid.

19 Map for Mobile. Capital Improvements Plan. Available at: <https://mapformobile.org/cip/>

improvement, and City facility improvements and repairs. Transformational economic development projects include investments in the Civic Arena downtown, the Redevelopment of Mobile's waterfront, the Three Mile Creek Greenway Trail, the St. Louis Street Redevelopment, the Africatown Welcome Center, and the Martin Luther King Jr. Ave. redevelopment amongst others.²⁰

2.2.2 DISASTER IMPACTS

Hurricane Sally caused infrastructure impacts throughout the city. During Hurricane Sally, only 73% of cell sites remained operational in the affected areas which may have interrupted service²¹, including access to critical emergency services and emergency text alerts. The Port of Mobile implemented port condition Zulu, a condition which suspends all port operations.²²

A month later, Hurricane Zeta struck the city, causing infrastructure impacts. On October 28th, Alabama Power reported 494,000 outages across the state which left electric customers without power for days, with concentration in Mobile County. Strong winds downed powerlines and caused widespread tree damage.²³ On October 29th, 2020, Mayor Sandy Simpson issued a general curfew for the City of Mobile between 6:30 PM and 6:30 AM citing "power outages at numerous intersections, dangling limbs and traffic lights and leaning or weakened trees".²⁴

The impacts of these storms and subsequent conversations with the Mobile County Emergency Management Agency (EMA) have highlighted the need for preparedness and response activities. Of note, the EMA pointed to the need for additional capacity and alternate locations for buildings serving as shelters of last resort and the need for additional capacity and alternate locations for staging personnel and commodities critical to emergency response operations. At present, shelter facilities and staging areas are located at a distance from major population centers (i.e., downtown Mobile) that causes logistical challenges related to transportation, access, and availability. Furthermore, the existing facilities and staging areas lack the capacity to meet the current needs.

20 City of Mobile. Capital Improvement Plan: 2024 – 2028. Available at: https://mapformobile.org/wp/wp-content/uploads/2024/07/CIP_2024-2028_Final07012024.pdf

21 CTIA.org. The wireless industry responds to Hurricane Sally. Available at: <https://www.ctia.org/news/blog-the-wireless-industry-responds-to-hurricane-sally>

22 Freightwaves.com (2020). Ports closing as Hurricane Sally closes in on Gulf Coast. Available at: <https://www.freightwaves.com/news/ports-closing-as-hurricane-sally-closes-in-on-gulf-coast>

23 Weather.gov (2020). Central Alabama Impacts from Hurricane Zeta October 28-29, 2020. Available at: https://www.weather.gov/bmx/event_zeta2020

24 Mayor Sandy Stimpson Twitter Account (2020). Available at: <https://x.com/MayorStimpson/status/1321904072727908353?s=20>

2.2.3 UNMET NEEDS METHODOLOGY

This section provides an overview of infrastructure need in the City of Mobile because of the disasters. This section uses FEMA Public Assistance (FEMA-PA) data to calculate infrastructure unmet need using the same methodology as the State of Alabama Community Development Block Grant – Disaster Recovery 2020 Action Plan.

Using the methodology from the State of Alabama Community Development Block Grant – Disaster Recovery 2020 Action Plan, the FEMA-PA table below includes estimated project cost, local match, resilience measures which include the increased cost of construction, and total need which includes the local match plus resilience.

2.2.4 UNMET NEEDS ANALYSIS

The FEMA Public Assistance (FEMA-PA) Program provides immediate assistance to impacted jurisdictions in the aftermath of a disaster. The public assistance process begins as soon as an area receives a Presidential declaration of an emergency or major disaster. Eligible FEMA-PA applicants include local governments, tribes, and private nonprofit organizations. FEMA-PA can be used for emergency or permanent work on a building, public works system, equipment, or natural feature that requires the work as a direct result of the declared incident and is in the designated disaster area. Emergency work must be completed within six months and includes categories A and B (debris removal or emergency protective measures). Permanent work must be completed within 18 months and includes categories C through Z (roads and bridges, water control facilities, public buildings and equipment, public utilities, recreational or other, and state management).²⁵

The Public Assistance program provided \$14,275,597 for the City of Mobile. Table 18 shows all projects under the Public Assistance program in the city. The three most expensive programs which cost over \$1,000,000 were for debris removal.

Table 18 shows the estimated FEMA-PA funds and unmet needs for each category of public assistance. Similarly, this table shows that most PA costs were for debris removal (\$13,583,433), which was \$12,000,000 higher than every other category. The next highest costs were protective measures (\$945,637) and public buildings (\$546,992).

ADECA's methodology for understanding infrastructure unmet need adds 23.6 percent to the project cost to account for the increased costs of construction and resilience making the total PA project need \$19,464,602. In accordance with ADECA's methodology, the unmet need considers the future costs of the project including resilience and the increased cost of construction to estimate the Federal Share (90%) and the local share/unmet need (10%) more accurately.²⁶ Subtracting the federal share of \$14,275,597 leaves the City of Mobile with a total Infrastructure Unmet Need of \$5,189,005.

²⁵ FEMA.gov. Process of Public Assistance. Available at: <https://www.fema.gov/assistance/public/process#eligibility>

²⁶ ADECA. CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>.

It should be noted that the disproportionately high flood risk noted in the pre-disaster conditions section may necessitate even higher costs for infrastructure due to the need to incorporate flood mitigation elements into any future infrastructure projects. In addition, in line with the aforementioned coordination with the Mobile County Emergency Management Agency with respect to the ongoing need related to preparedness and response activities, the need for additional capacity and alternate locations for buildings serving as shelters of last resort and the need for additional capacity and alternate locations for staging personnel and commodities critical to emergency response operations are being evaluated. It is anticipated that the unmet need related to infrastructure (including mitigation activities) will increase to account for the outcomes of ongoing discussions with EMA.

Table 17: Infrastructure Unmet Need by PA Category, City of Mobile

PA Category	Total PA Project Cost	Total PA Project Cost (+15% Resilience)	Total PA Project (+23.6% Increased Costs of Construction and Resilience)	Resilience and Increased Costs	Federal Share	Local Share
A – Debris Removal	\$13,583,433	\$15,620,948	\$16,707,623	\$2,037,515	\$12,225,090	\$1,358,343
B – Protective Measures	\$945,637	\$1,087,483	\$1,163,134	\$141,846	\$851,073	\$94,564
C – Roads and Bridges	\$16,012	\$18,414	\$19,695	\$2,402	\$14,411	\$1,601
D - Water Control Facilities	0	0	0	0	0	0
E – Public Buildings	\$546,992	\$629,041	\$672,800	\$82,049	\$492,293	\$54,699
F – Public Utilities	0	0	0	0	0	0
G – Recreational or Other	\$400,760	\$460,875	\$492,935	\$60,114	\$360,684	\$40,076
Z – State Management	\$332,045	\$381,852	\$408,416	\$49,807	\$332,045	\$-
Total	\$15,824,880	\$18,198,612	\$19,464,602	\$2,373,732	\$14,275,597	\$1,549,283

Source: FEMA PA, using methodology of ADECA 2020 DR Action Plan, data pulled June 2024

2.3 ECONOMIC DEVELOPMENT

2.3.1 PRE-DISASTER CONDITIONS

Mobile is a major port city and important site of commerce both for the state of Alabama and nationwide. According to the Mobile City-Wide Resilience Assessment, Mobile has a “strong and growing economy that has weathered several booms and busts” throughout its history. In considering economic resilience, the Assessment lists assets in recent job creation, the Port of Mobile, and strong manufacturing and logistics industries. The Assessment notes that the greatest challenges facing Mobile’s economy include workforce shortages and difficulties in recruiting. Surveys of residents indicate challenges in inequality and poor educational quality.²⁷ *Source: American Community Survey, 5-Year Estimates (2017, 2022)*

Table 20 shows an unemployment rate of 6.5 percent in 2022 which was higher than the national rate of 3.5 percent but has been decreasing since 2017.

Table 18: Earnings in Past Year by Educational Attainment, City of Mobile, 2017 to 2022

	2017	2022
Population 25 years and over with earnings	31,152	39,891
Less than high school graduate	\$17,541	\$23,095
High school graduate (includes equivalency)	\$24,236	\$32,448
Some college or associate's degree	\$26,895	\$34,436
Bachelor's degree	\$44,331	\$50,726
Graduate or professional degree	\$53,582	\$66,904

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Table 19: Unemployment Rate, City of Mobile, 2017 to 2022

	2017		2022	
	Count	Share	Count	Share
Population 16 years and over	154,796		150,595	
In labor force	88,611	57.2%	87,429	58.1%
Not in labor force	66,185	42.8%	63,166	41.9%
Unemployment Rate	-	7.9%	-	6.5%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

²⁷ City-wide Resilience Assessment. December 2023. Available at: <https://www.cityofmobile.org/public-works/uploads/102907MobileResilienceAssessmentDec2023FINAL.pdf>

The highest employing industries in Mobile include education services, and health care and social assistance (25.2 percent of the workforce), retail trade (12.5 percent), arts, entertainment, and recreation, and accommodation and food services (10.7 percent) professional, scientific, and management, and administrative, and waste management services (10.5 percent), and manufacturing (10 percent) (Table 21). There have been minor changes in industries by employment prior to and after the disasters, with the most notable changes being a growth in construction workers and a decline in arts, entertainment, and recreation, and accommodation and food services workers. Many of the top employing industries in Mobile are in sectors that may have hourly wage rather than salaried employees. These employees may be especially vulnerable to economic shocks and missed days of work that result in lower income.

Table 20: Industries by Employment, City of Mobile, 2017 to 2022

	2017		2022	
	Count	Share	Count	Share
Civilian employed population 16 years and over	81,399	-	81,489	-
Agriculture, forestry, fishing and hunting, and mining	464	0.6%	486	0.6%
Construction	3,989	4.9%	4,944	6.1%
Manufacturing	7,832	9.6%	8,142	10.0%
Wholesale trade	2,175	2.7%	1,845	2.3%
Retail trade	10,133	12.4%	10,166	12.5%
Transportation and warehousing, and utilities	4,243	5.2%	4,785	5.9%
Information	1,576	1.9%	1,225	1.5%
Finance and insurance, and real estate and rental and leasing	4,512	5.5%	5,044	6.2%
Professional, scientific, and management, and administrative and waste management services	8,736	10.7%	8,568	10.5%
Educational services, and health care and social assistance	21,182	26.0%	20,539	25.2%
Arts, entertainment, and recreation, and accommodation and food services	9,489	11.7%	8,693	10.7%
Other services, except public administration	3,909	4.8%	3,638	4.5%
Public administration	3,159	3.9%	3,414	4.2%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

2.3.2 DISASTER IMPACTS

During Hurricane Sally, the City of Mobile had to implement port condition Zulu, a condition which suspends all port operations.²⁸ The Port of Mobile is an essential center for shipment for the entire State of Alabama. According to the Alabama Port Authority, the Port of Mobile generated nearly \$100 billion in revenue supported 351,359 jobs for the state in 2023.²⁹

Hurricane Sally and Hurricane Zeta interrupted normal business operations due to work closures from dangerous conditions, dangerous commuting with power outages at multiple intersections, and Mayor Sandy Simpson issuing a general curfew.³⁰ The sections below cover additional economic damages to area businesses. As discussed in the State's 2020 Action Plan³¹, Hurricanes Sally and Zeta exacerbated the economic impacts from the COVID-19 pandemic, which had shut down several economic sectors.

2.3.3 UNMET NEEDS METHODOLOGY

This section provides an overview of economic revitalization unmet need in the City of Mobile resulting from the disasters. The Small Business Administration (SBA) offers Economic Injury Disaster Loans (EIDL) and Business Disaster Loans to aid businesses and private nonprofit organizations in rebuilding in the wake of disaster. Under Economic Injury Disaster Loans (EIDL), small businesses, small agricultural cooperatives, and private nonprofit organizations that are in disaster declared areas and have substantial economic injury, meaning the business is unable to meet its obligations and pay its ordinary and necessary operating expenses, can receive up to \$2 million for assistance to meet financial obligations and operating expenses. The loan amount is based on economic injury and company's financial needs regardless of property damage. EIDL funds are only available to small businesses that are unable to obtain credit elsewhere.³² Under Business Physical Disaster Loans, businesses of any size and most private non-profit organizations that are located within disaster declared areas and have experienced damage can apply for up to \$2 million to cover disaster losses that are not fully covered by insurance.³³ Because both EIDL and Business Disaster Loans are only available after insurance funds and other sources of credit, the below data is snapshot that may not demonstrate the full extent of damage to businesses.

28 Freightwaves.com (2020). Ports closing as Hurricane Sally closes in on Gulf Coast. Available at: <https://www.freightwaves.com/news/ports-closing-as-hurricane-sally-closes-in-on-gulf-coast>

29 Alabama Political Reporter (2024). Ivey: Port of Mobile had nearly \$100 billion impact on Alabama economy. Available at: <https://www.alreporter.com/2024/02/02/ivey-port-of-mobile-had-nearly-100-billion-impact-on-alabama-economy/>

30 Mayor Sandy Stimpson Twitter Account (2020). Available at: <https://x.com/MayorStimpson/status/1321904072727908353?s=20>

31 ADECA (2020). CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>

32 US Small Business Administration, Economic Injury Disaster Loans. Available at: <https://www.sba.gov/funding-programs/disaster-assistance/economic-injury-disaster-loans>

33 US Small Business Administration, Physical Damage Loans. Available at: <https://www.sba.gov/funding-programs/disaster-assistance/physical-damage-loans#id-business-physical-disaster>

With the overlapping disaster impacts from the hurricanes and the COVID-19 pandemic, businesses and non-profits had access to additional sources of funding for business assistance and relief. Other concurrent relief sources include:

- SBA's Paycheck Protection Program (PPP), 2020
- American Rescue Plan Act, State and Local Fiscal Recovery Fund (ARPA/SLFRF), 2021 – present

2.3.4 UNMET NEEDS ANALYSIS

Table 22 shows that the City of Mobile has 97 total approved SBA business loans. For Disaster 4563, there were 865 applicants with 91 approved applications (10.5 percent). For Disaster 4573, there were 111 applicants with 6 approved applications (5.4 percent).

Table 21: SBA Application by Status

	4563		4573	
	# of Applications	Percent	# of Applications	Percent
Total Business Applications	865	N/A	111	N/A
Processed Applications	N/A	N/A	N/A	N/A
In-Process Applications	N/A	N/A	N/A	N/A
Declined Applications	302	35%	46	41.4%
Withdrawn Applications	211	24.4%	20	18%
Approved Applications	91	10.5%	6	5.4%
Unmet Need (Total Approved Duplicate Blank)	261	30.2%	45	40.5%

Source: SBA Disaster Loan Data, data pulled June 2024

Of the businesses that had verified loss, there was an estimated average verified loss of \$165,232.78 for applicants for DR-4563 and an estimated average verified loss of \$38,445.67 for applicants for DR-4573 (Table 23).

Table 22: SBA Business Loan Data

Disaster	Count of Businesses with Verified Losses	Average Verified Loss	Estimated Additional Losses to Businesses
4563	421	\$165,232.78	N/A
4573	34	\$38,445.67	N/A

Source: SBA Disaster Loan Data, data pulled June 2024

There were 282 applicants with verified severe loss. Of those with severe loss, 59 were approved, accounting for 68 percent of the approved applications. The SBA denied 105 applicants with severe loss. The NAICS codes in the SBA data show that 300 of the 865 business applications, were in the Real Estate and Rental Leasing sector. Sixty-eight of the applications in this sector were approved, which counts for 70.1 percent of all approved applications.

Table 24: Economic Unmet Need by Category accounts for an additional fifteen percent (15%) resilience costs and calculates the City's total estimated impact at \$38,298,247. According to the SBA business report, SBA provided \$7,778,480 in total benefits to businesses. Therefore, the City's remaining unmet need is \$30,519,767.

Table 23: Economic Unmet Need by Category

	# Business/EIDL Loans	Amount Business/EIDL Loan Applications
SBA approved applicants with Minor-Low loss	1	\$897
SBA approved applicants with Minor-High loss	4	\$20,771
SBA approved applicants with Major-Low loss	5	\$55,838
SBA approved applicants with Major-High loss	24	\$516,623
SBA approved applicants with Severe loss	59	\$14,217,520
SBA declined applicants with Minor-Low loss	16	\$25,464
SBA declined applicants with Major-Low loss	9	\$94,788
SBA declined applicants with Minor-High loss	28	\$135,749
SBA declined applicants with Major-High loss	25	\$544,183
SBA declined applicants with Severe loss	105	\$17,691,014
Total verified loss for all businesses (estimate)		\$33,302,847
Accounting for 15% resilience addition		\$4,995,427
Total Estimated Impact + Resilience		\$38,298,247
Total Verified loss of approved applicants		\$14,811,649
Total Benefit		\$7,778,480
Overall Business Unmet Needs		\$30,519,794

Source: SBA Disaster Loan Data; data pulled June 2024

The City of Mobile had a total verified loss for all businesses of approximately \$33,302,847. In accordance with state methodology outlined in the 2020 Action Plan³⁴, the estimate in

According to the PPP Directory³⁵, a total of 4,584 loans were distributed to Mobile, AL, accounting for between \$355M and \$677M in Payroll Protection Program loans to businesses. This, taken with the low approval rate of SBA loans, begins to help explain why during the outreach for this local recovery plan, few instances of economic revitalization needs were

³⁴ ADECA (2020). CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>

³⁵ PPP Directory (2023). All PPP Loans in Mobile, AL. Available at: <https://ppp.directory/alabama/mobile>

identified as remaining almost four years later. Many of the business needs have been address through availability of pandemic relief in the interim.

Table 24: Total Estimated Impact and Unmet Need

Category	4563	4573
Total Verified Loss for all businesses (estimate)	\$32,358,953	\$943,894
Accounting for 15% resilience addition	\$4,853,843	\$141,584
Total estimated impact + resilience*	\$37,212,796	\$1,085,478
Total approved loan amount	\$7,662,680	\$115,800
Total unmet need	\$29,550,116	\$969,678

Source: SBA Disaster Loan Data, *Following state methodology outlined in 2020 Approved Action Plan; data pulled June 2024

2.4 DEMOGRAPHICS

2.4.1 DEMOGRAPHIC OVERVIEW

This section examines the demographics and social vulnerability of Mobile to inform the disaster recovery and mitigation program design.

Mobile, with a total population of 186,316, is the fourth largest city in the state. Over the past five years, the city’s population has declined, with the only age group experiencing growth being those aged 65 and older. The median age in Mobile is 39.3 years. Currently, 16.9 percent of the population is 65 years and older, and 21.5 percent 18 years and younger. Approximately 14 percent of Mobile’s population has a disability.

In 2017, Mobile’s ethnic and racial composition was as follows: 2.8 percent Hispanic or Latino, 43.4 percent White or Caucasian, 54.6 percent Black or African American, 2.3 percent Asian, and 3.2 percent Other (Table 29).

Approximately 3 percent of the population was foreign born, and of this percentage Asia and Latin America were the most represented places of origin at 45.5 percent and 31.4 percent, respectively (Table 16). Approximately 5 percent of the population spoke a language other than English at home, and 2 percent of the population spoke Spanish. Nearly 2 percent of the population reported limited proficiency in English.

2.4.2 DEMOGRAPHIC TRENDS

Mobile’s population declined by about 6,000 residents between 2017 and 2022. In 2022, there were about 186,316 residents in Mobile, with a ratio of .89 males to females.

Table 25: Gender, City of Mobile, 2017 to 2022

	Sum of Total Population	Sum of Male Population	Sum of Female Population	Average Ratio of Males to Females
2017	192,085	91,570	100,515	0.91:1
2022	186,316	87,658	98,658	0.89:1

Source: American Community Survey, 5-Year Estimates (2017, 2022)

The population of persons under 18 in households also decreased between 2017 and 2022. In 2022, most children under 18 live in married-couple households (44 percent of children in households) or female householder, no spouse/partner present households (43 percent of children in households).

Table 26: Family Status by Geography, City of Mobile, 2017 to 2022

	2017	2022
Sum of Population Under 18 in Households (excluding Householders, Spouses, and Unmarried Partners)	42,017	39,955
Sum of Population Under 18 years in Married-Couple Households	19,274	17,445
Sum of Population Under 18 Years in Cohabiting Couple Households	unknown	3,610
Sum of Population Under 18 Years in Male Householder, No Spouse/Partner Present Households	2,573	1,826
Sum of Population Under 18 Years in Female Householder, No Spouse/Partner Present Households	20,080	17,074
Percent of Children in Married-Couple Households	46%	44%
Percent of Children in Cohabiting Couple Households	unknown	9%
Percent of Children in Male Householder, No Spouse/Partner Present Households	6%	5%
Percent of Children in Female Householder, No Spouse/Partner Present Households	48%	43%

Source: American Community Survey, 5-Year Estimates (2017, 2022)

Mobile's foreign-born population did not change much between 2017 and 2022. In 2017 3.5% percent of the population was foreign born, and that percent rose to 3.6 percent in 2022 (Table 16). Of this population 43.3 percent were born in Asia and 28.5 percent were born in Latin America in 2022. The percentage of the population with limited proficiency in English rose from 0.8 percent in 2017 to 1.7 percent in 2022 (Table 28), which is something that should be considered when communicating disaster recovery programs.

Table 27: Place of Birth by Country, City of Mobile, 2017 to 2022

	2017		2022	
	Sum	Percent	Sum	Percent
Total population	192,085		186,316	
Population who is foreign-born	6,520	3.4%	6,712	3.6%
Foreign-born population born in Europe	925	14.2%	713	10.6%
Foreign-born population born in Asia	2,965	45.5%	2,905	43.3%
Foreign-born population born in Africa	369	5.7%	996	14.8%
Foreign-born population born in Oceania	29	0.4%	96	1.4%
Foreign-born population born in Latin American	2,046	31.4%	1,916	28.5%

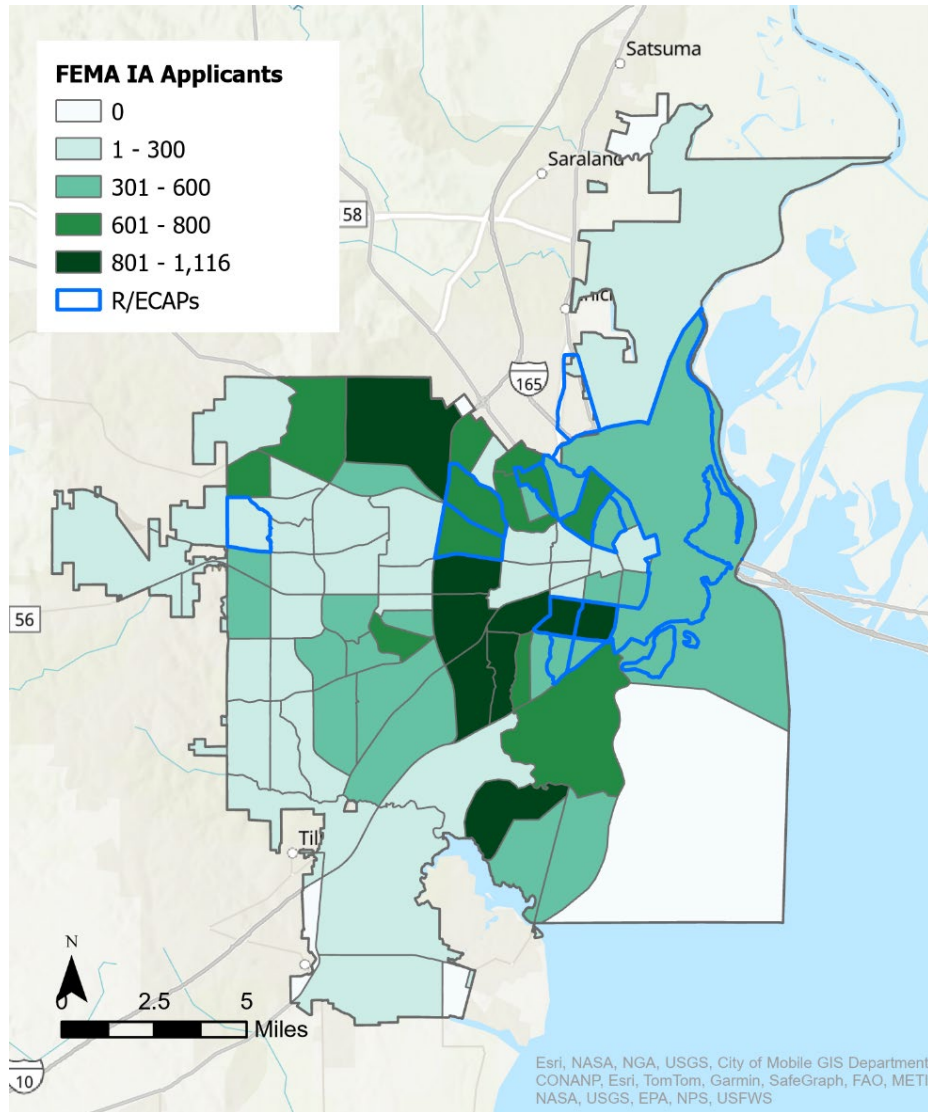
Source: American Community Survey, 5-Year Estimates (2017, 2022)

2.4.2.1 Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

Racially or ethnically concentrated areas of poverty (R/ECAPs) are defined by HUD as areas having a non-white population of 50 percent or more and 40 percent or more individuals living at or below the poverty line or is three or more times the average tract poverty rate for the metropolitan area.³⁶ There are 13 R/ECAP census tracts in the City of Mobile as of February 2024 (Figure 6). Most R/ECAP areas did not have FEMA IA applicants after Hurricanes Zeta or Sally.

³⁶ HUD Office of Policy Development and Research. (2020) Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). Available at: <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/about>.

Figure 6: R/ECAPs, City of Mobile



Source: FEMA IA, HUD R/ECAPs

2.4.2.2 Social Vulnerability

Social vulnerability refers to the potential negative effects on communities caused by external stresses on human health.³⁷ The social vulnerability index from the Centers for Disease Control and Prevention (CDC) ranks census tracts on 16 social factors, including unemployment, racial and ethnic minority status, and disability.³⁸ Households and individuals living in tracts with

³⁷ Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry. CDC/ATSDR Social Vulnerability Index. Available at: <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>.

³⁸ CDC/ATSDR. CDC SVI Documentation 2020. Available at: https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html.

high social vulnerability may have difficulty recovering from a disaster. On this ranking, the City of Mobile has 38.7 percent census tracts that are the highest quartile of vulnerability in the country, meaning that these census tracts have an overall vulnerability score which is higher than 75 percent of census tracts in the country indicating more vulnerability than those tracts.

Table 28: Number of Census Tracts by SoVI Category, City of Mobile, 2020*

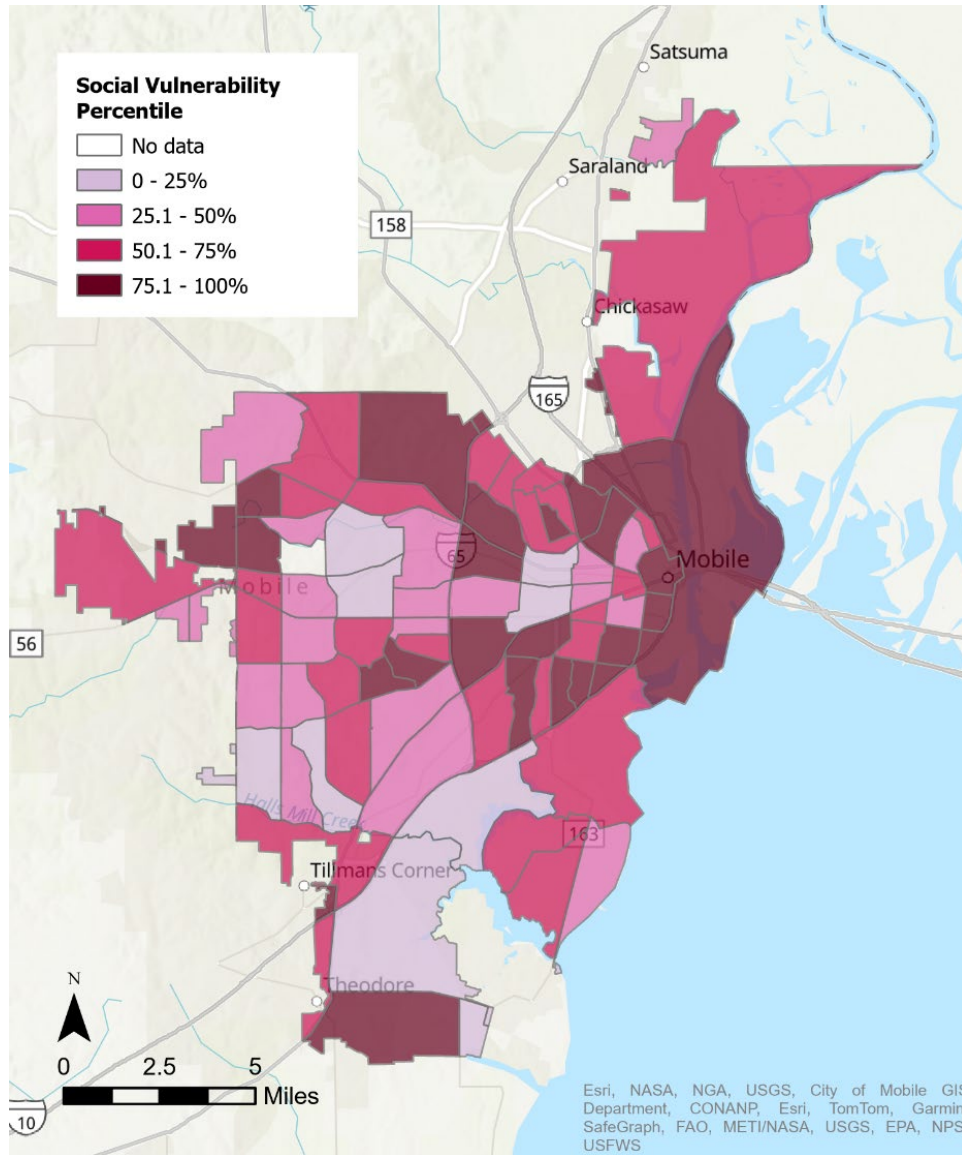
1st quartile (0 – 25%)	2nd quartile (25.1 – 50%)	3rd quartile (50.1 – 75%)	4th quartile (75.1 – 100%)
12.9%	20.4%	28.0%	38.7%

Source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

**Note that the index includes a larger geography than city boundaries for the City of Mobile.*

Figure 7 shows that the most vulnerable tracts are downtown and then dispersed throughout the City.

Figure 7: Social Vulnerability Index by Census Tract, City of Mobile



Source: Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

Table 29: Population by SoVI Category, City of Mobile, 2020

1 st quartile (0 – 25%)	2 nd quartile (25.1 – 50%)	3 rd quartile (50.1 – 75%)	4 th quartile (75.1 – 100%)
15.9%	23.1%	28.3%	32.7%

Source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

*Note that the index includes a larger geography than city boundaries for the City of Mobile.

Table 30 shows that 32.7 percent Mobile residents live in tracts in the top quartile of vulnerability.

Table 30: Demographics, City of Mobile, 2022

Demographic	Count	Percent
Total Population	186,316	100%
Under 5 years	10,552	5.7%
65 years and over	31,516	16.9%
Population with a Disability	26,609	14.3%
White or Caucasian	80,812	43.4%
Black or African American	101,821	54.6%
American Indian and Alaska Native	1,540	0.8%
Asian	4,373	2.3%
Native Hawaiian and Other Pacific Islander	201	0.1%
Other	4,194	2.3%

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates

Table 31: Income Demographics, City of Mobile, 2022

Income/Economic Demographics	Estimate
Median Household Income	\$44,780
Per Capita Income	\$28,905

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates

Table 32: Income Demographics – Low Income, City of Mobile, 2022

Income/Economic Demographics	Estimate
Income in the past 12 months below poverty level	37,379

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates

All activities funded within the City's Local Recovery Plan must benefit low- and moderate-income (LMI) persons or aid in another national objective. The City of Mobile has 44.8 percent LMI persons, including a count of 82,540 low- and moderate-income persons. A person is determined to be low income "only if he or she is a member of a family whose income would qualify as "very low income" under the Section 8 Housing Assistance Payments program. Unrelated individuals are considered as one-person families for this purpose. Generally, these Section 8 limits are based on 50% of area median income (AMI). Similarly, CDBG moderate income relies on Section 8 "lower income" limits, which are generally tied to 80% of AMI"³⁹.

Table 33: LMI Analysis, City of Mobile, 2020

Total LMI Persons	Population*	Percent LMI
82,540	184,120	44.8%

Source: HUD, ACS 5-Year 2016-2020 Low and Moderate Income Summary, *Population is LOWMODUNIV which is the number of persons in the city with the potential for being deemed low-, moderate- and middle-income.

Table 34: Limited English Proficiency

	Number of People Who Speak English Less than 'Very Well'	Percent of People Who Speak English Less than 'Very Well'
2017	1,358	0.8%
2022	3,045	1.7%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017, 2022)

The Continuum of Care (CoC) is the regional network of nonprofit providers, local governments, and housing entities that work in conjunction to coordinate housing services and quickly rehouse homeless individuals, families, youth, persons fleeing domestic violence, etc. Overseen by HUD, the CoC program is designed to promote community wide planning, improve coordination amongst providers, and improve data collection⁴⁰. The Continuum of Care is coordinated across Mobile and Baldwin counties and led by Housing First Inc. as the lead agency. For HUD funding requirements, every CoC must complete a Point-in-Time count of people experiencing homelessness at least every other year. This is locally coordinated count of sheltered and unsheltered people experiencing homelessness on a single night in January⁴¹. In 2022, The Point-in-Time Count counted 585 people in 412 households experiencing homelessness, 148 of whom were children. Of the counted population, 42.7 percent were in an emergency shelter, 23.6 percent were in transitional housing, and 33.7 percent were unsheltered.

39 ACS 5-Year 2011-2015 Low and Moderate Income Summary FAQs. HUDexchange.info. Available at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-faqs-2011-2015/>

40 Introductory Guide to the Continuum of Care (CoC) Program. 2012. Available at: <https://files.hudexchange.info/resources/documents/CoCProgramIntroductoryGuide.pdf>

41 HUD Exchange. Point-In Time Count and Housing Inventory Count. Available at: <https://www.hudexchange.info/programs/hdx/pit-hic/#hic-guides-and-tools>

Table 35: Point-in-Time County by Type of Shelter, Baldwin and Mobile County, 2022

	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Total Number of Households	154	78	180	412
Total Number of Persons	250	138	197	585
Number of Persons < 18 years of age	87	56	5	148

Source: Housing First Inc. Point-In-Time Count

The diversity index from the U.S. Census Bureau measures the probability that two people chosen at random will be from different racial and ethnic groups.⁴² The closer the index to 1, or 100%, the more diverse that geography’s population. From 2020 Census data, Mobile County has a diversity index of 59.4 percent (Table 37). This is higher than the state of Alabama’s diversity index (53.1 percent), indicating that Mobile County is slightly more diverse than the state overall.

Table 36: Diversity Index, Mobile County, 2020

Diversity Index
59.4%

Source: U.S. Census Diversity Index

The median household income in Mobile is \$48,524, with a per capita income of \$31,328 (Table 36). In 2022 there were 37,379 individuals in Mobile with incomes below the poverty level.

Table 37: Income and Poverty Levels in the Past 12 Months, City of Mobile

	Median Household Income	Per Capita Income	Number with Income Below Poverty Level (past 12 months)	Percent with Income Below Poverty Level (past 12 months)
Mobile 2017	\$40,020	\$24,827	41,277	22.4%
Mobile 2022	\$48,524	\$31,328	37,379	20.7%
Alabama 2017	\$46,472	\$25,746	849,699	18.0%
Alabama 2022	\$59,609	\$33,344	768,897	15.7%

Source: U.S. Census Bureau, 2017 and 2022 American Community Survey 5-Year Estimates

The state of Alabama has an LMI population which is 41.2 percent of the overall state population.

⁴² U.S. Census. Racial and Ethnic Diversity in the United States: 2010 Census and 2020 Census. Available at: <https://www.census.gov/library/visualizations/interactive/racial-and-ethnic-diversity-in-the-united-states-2010-and-2020-census.html>.

Table 38: State-Wide LMI Analysis, City of Mobile, 2020

	Total LMI Persons	Total Population	Percent LMI
Low (<50% AMI)	1,192,257	4,775,835	25.0%
Low Mod (<80% AMI)	1,967,744	4,775,835	41.2%
LMI (<120% AMI)	2,854,150	4,775,835	59.8%

Source: HUD, ACS 5-Year 2016-2020 Low and Moderate Income Summary, *Population is LOWMODUNIV which is the number of persons in the city with the potential for being deemed low-, moderate- and middle-income.

Mobile which has an LMI population which is 44.8% of the total population has a higher relative LMI population compared to the statewide LMI population.

Table 39: LMI Analysis of Federally Declared Disaster Areas, City of Mobile

	Total LMI Persons	Total Population	Percent LMI
Low (<50% AMI)	51,610	184,120	28.0%
Low Mod (<80% AMI)	82,540	184,120	44.8%
LMI (<120% AMI)	114,305	184,120	62.1%

Source: 2022 HUD LMISD Calculations

Using 2020 HUD income limits for Mobile County and FEMA IA income ranges, there are roughly 29,989 FEMA IA applicants with low- to moderate-income (Table 41).

Table 40: Number of FEMA Applicants by LMI Category, City of Mobile, 2020

< 80% AMI	Over 80% AMI	Potential LMI (No Income Stated)	Grand Total
29,989	1,941	6,848	38,778

Source: FEMA IA, HUD Income Limits

3 MITIGATION NEEDS ASSESSMENT

3.1 OVERVIEW

In accordance with HUD guidance, the City of Mobile completed the following Mitigation Needs Assessment. The City reviewed existing hazard plans, and the Action Plan, as amended and approved by HUD on October 18, 2023, to develop a multi-hazard risk-based MIT Needs Assessment. This assessment informs and provides a substantive basis for programs proposed in this plan, with a focus on addressing and analyzing all significant current and future hazard risks.

To both ensure sufficient clarity of this plan and address current risks, future risks and unmet mitigation needs for the City, this Assessment:

1. Provides context surrounding the City's landscape;
2. Discusses historic damage patterns;
3. Utilizes the state and local Hazard Mitigation Plans (HMP) to inform the risk analysis;
4. Assesses hazards in accordance with local and regional plans, research and data;
5. Assesses current and future risk to critical service areas or community lifelines; and
6. Addresses unmet mitigation needs in response to identified current and future risks.

All mitigation activities enabled by this LRP will increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters, be CDBG-eligible activities under Title I of the Housing and Community Development Act of 1974 or HCDA or otherwise eligible pursuant to a waiver or alternative requirement, and meet a national objective, including additional criteria for mitigation activities and Covered Projects.

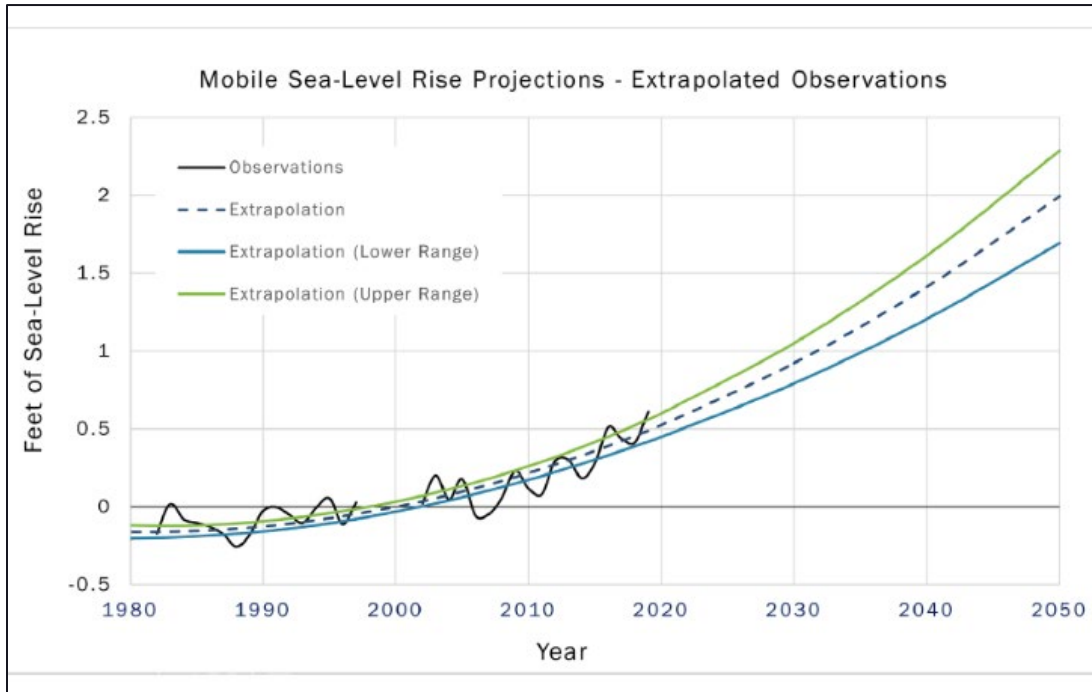
3.2 CITY CONTEXT

The City of Mobile, Alabama, is located in a region that faces significant natural hazards due to its geographical and climatic conditions. Being on the Coastal Plain of the Gulf of Mexico, Mobile is particularly vulnerable to hurricanes and tropical storms, which can bring severe wind damage, flooding, and associated risks such as tornadoes. The city's low-lying topography intensifies the threat of storm surges and inland flooding during these events. Additionally, sea level rise and coastal erosion pose ongoing threats, impacting habitats, infrastructure, and property values. Tornadoes, although less frequent, represent a serious risk due to their potential to cause extensive damage quickly and unpredictably.

The strategic approaches to handling these natural hazards in Mobile emphasize the importance of preparedness and resilience. There is a strong focus on enhancing infrastructure resilience, improving emergency management capabilities, and adopting land-use policies that minimize vulnerability. The city aims for a holistic approach to urban planning and disaster preparedness by integrating scientific data and community input, ensuring that it is well-equipped to handle and quickly recover from natural disasters. The overall landscape of Mobile

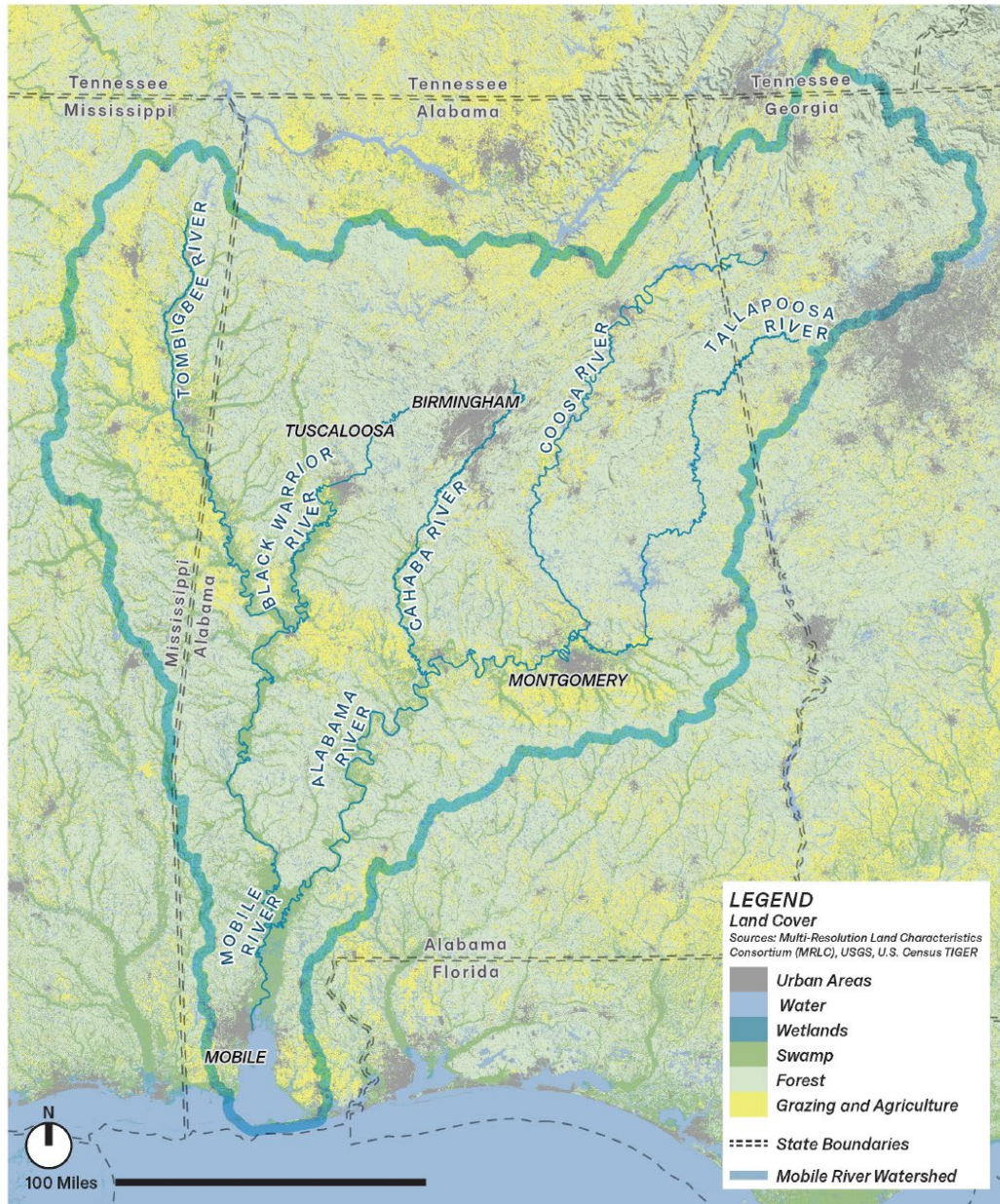
regarding natural hazards is characterized by high exposure and vulnerability, necessitating continuous and adaptive mitigation efforts to protect and enhance community resilience.

Figure 8: Sea-Level Rise Projections and Extrapolated Observations for Mobile, AL



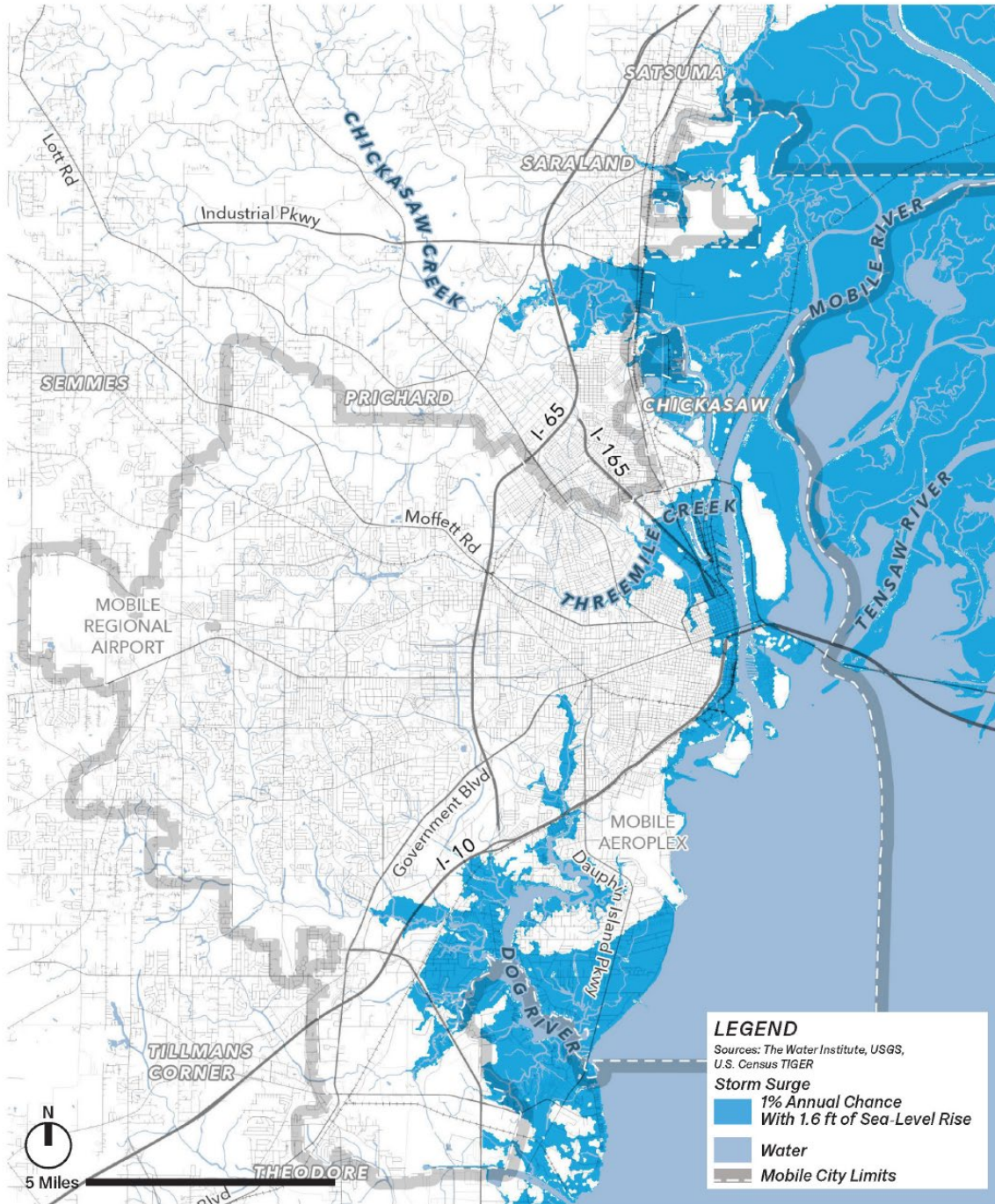
Source: Mobile City-Wide Resilience Assessment, 2023

Figure 9: The Mobile Bay Watershed and Associated Land Cover Types



Source: Mobile City-Wide Resilience Assessment, 2023

Figure 10: Future Storm Surge Projections for City of Mobile with 1.6 ft of Sea-Level Rise



Source: Mobile City-Wide Resilience Assessment, 2023

3.3 STATE HAZARD MITIGATION PLAN

The Alabama Emergency Management Agency is responsible for development of the Alabama State Hazard Mitigation Plan in consultation with state, regional, local, and community stakeholders. As a part of this mitigation needs assessment the City reviewed the Alabama State Hazard Mitigation Plan as approved by FEMA on August 17, 2023.

The purpose of the plan is to rationalize the process of identifying and implementing appropriate hazard mitigation actions across the state. The document includes a detailed characterization of natural hazards statewide; a risk assessment that describes potential losses to physical assets, people, and operations; a set of goals, objectives, strategies, and actions that will guide the state's mitigation activities; and a detailed plan for implementing and monitoring the required aspects of the plan. Participation by various stakeholders occurs largely through the State Hazard Mitigation Council, also referred to as the State Hazard Mitigation Task Force (SHMTF). The plan includes four goals for hazard mitigation in the state:

1. Enhance the comprehensive statewide hazard mitigation system.
2. Reduce the State of Alabama's vulnerability and increase its resilience to hazards to protect people, property, and natural resources.
3. Foster public awareness and understanding of hazard risks and mitigation opportunities.
4. Expand and promote coordination and communication with other government agencies, local governments, and other relevant organizations.

The Alabama State Hazard Mitigation Plan identifies several hazards that for Mobile County. These include:

1. **Flooding:** Flooding is recognized as a significant risk due to Mobile County's coastal location, which exposes it to storm surges and heavy rainfall events. This is exacerbated by low-lying geographic features that make the area particularly vulnerable to both coastal and inland flooding.
2. **Hurricanes and Tropical Storms:** Given its Gulf Coast location, Mobile County is susceptible to hurricanes and tropical storms. These events can lead to severe wind damage, flooding, and other related hazards like tornadoes.
3. **Sea Level Rise and Coastal Erosion:** The plan notes the ongoing threat of sea level rise which contributes to coastal erosion and increases the risk of flooding during storm events.
4. **Tornadoes:** Although less frequent than hurricanes, tornadoes pose a significant risk due to the potential for severe destruction over localized areas within a very short time span.
5. **Earthquakes:** Although generally considered a low-probability event in this region, the possibility of earthquakes is included in the risk assessment, acknowledging that even minor seismic activity could have impacts given the right conditions.

These hazards are assessed with attention to historical data and projected changes due to factors such as climate change, which could increase the frequency and intensity of these events. The mitigation strategies proposed in the plan aim to address these risks through

various measures, including improved infrastructure resilience, community preparedness programs, and land use planning to reduce exposure and vulnerability.

3.4 REGIONAL HAZARD MITIGATION PLAN

The Division A Multi-Jurisdictional Hazard Mitigation Plan is intended to identify and detail the hazards that affect the Alabama Emergency Management Agency's (AEMA) Division A. This division includes the following counties and the municipalities and jurisdictions within them: Baldwin, Choctaw, Clarke, Conecuh, Escambia, Mobile, Monroe, and Washington.

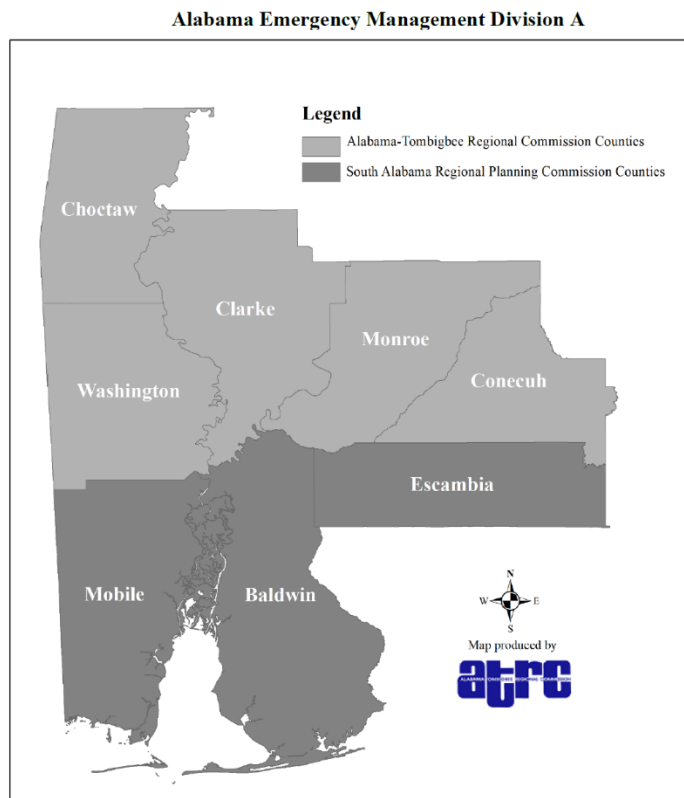
The plan was the first regional mitigation plan for the area. Previously, each county was covered by a multi-jurisdictional county plan. A regional plan provides hazard information in a more concise and effective manner. A regional planning process provides an opportunity for participants to discuss and identify mitigation strategies to address identified hazards.

The City of Mobile, located within the southwestern region (Division A) of Alabama, has experienced numerous natural disasters over the years, necessitating the development of a comprehensive hazard mitigation plan. The plan details the historical occurrences of various disasters and assesses their risks to better prepare for future events. Among these, flooding has been a recurrent issue, heavily impacting the city's infrastructure and population.

From 2000 to 2020, the City experienced numerous flash flood events, with significant property damage and occasional injuries. For example, the flash flood on March 19, 2000, caused \$25,000 in property damage. Similarly, severe flooding on April 29, 2014, resulted in an estimated \$6.5 million in damages in Mobile County. These events underscore the city's vulnerability to heavy rainfall and subsequent flooding.

The City also faces considerable risks from hurricanes and tropical storms. Historical data indicates multiple instances of such events causing extensive damage. Notable hurricanes include Hurricane Frederic in 1979 and Hurricane Ivan in 2004. Hurricane Frederic alone

Figure 11: AEMA Division A Counties



Source: Division A Regional Multi-Jurisdictional Hazard Mitigation Plan 2021 – Phase Two

caused approximately \$7.7 billion in damages (adjusted to 2017 dollars), severely impacting Mobile County.

Tornadoes, although less frequent than floods and hurricanes, still pose a substantial threat. Since 2015, the region has recorded 102 tornadoes, leading to property damage estimated at nearly \$13 million. Fortunately, these tornadoes have resulted in relatively low fatalities and injuries, with only one recorded death and 16 injuries.

The plan identified and categorized disasters by risk based on a number of factors but mostly historical occurrence. The following table summarizes the identified high-risk disasters for the City of Mobile:

Table 41: Diversity Index, Mobile County, 2020

Disaster Type	Occurrences	Property Damage
Flooding	94 since 2000	\$7.58 million
Hurricanes/Tropical Storms	17 since 1969	12.57 billion
Tornadoes	66 since 1995	\$6.44 million
Severe Thunderstorm	186 since 1995	\$6.2 million

Source: FEMA IA, HUD Income Limits

The plan also includes Community Action Programs for each of the jurisdictions within the region. The City of Mobile identified five goals for the planning period:

1. **Prevention:** Manage the development of land and buildings to minimize risks of loss due to natural hazards.
2. **Property Protection:** Protect structures and their occupants and contents from the damaging effects of natural hazards.
3. **Map Information:** Increase public access to Flood Insurance Rate Map (FIRM) information.
4. **Natural Resources Protection:** Preserve and restore the beneficial functions of the natural environment to promote sustainable community development that balances the constraints of nature with the social and economic demands of the community.
5. **Structural Projects:** Apply engineered structural modifications to natural systems and public infrastructure to reduce the potentially damaging impacts of hazards, where feasible, cost effective, and environmentally suitable.

Among these goals, the City has developed 34 objectives within which there are 63 mitigation measures identified.

3.5 LOCAL PLANNING EFFORTS

In addition to reviewing hazard mitigation plans, the City is also including completed and ongoing local planning processes to ensure this needs assessment is aligned with all of the strategic goals of the City.

3.5.1 MAP FOR MOBILE: FRAMEWORK FOR GROWTH

Map for Mobile is the comprehensive plan for the City of Mobile, Alabama, developed through extensive public input and collaboration with various stakeholders and adopted in 2017. The plan is designed to guide the city's development over the coming years, focusing on enhancing the built environment, boosting mobility and connectivity, and fostering sustainable growth and community well-being.

Key hazards and risks highlighted in the plan include the challenges posed by the city's current infrastructure, which is under strain due to historical urban sprawl and significant population shifts. The document also acknowledges the need for improved traffic management and transportation infrastructure to support both current residents and future growth. There is a significant focus on the necessity of updating land use and building codes to better manage developmental pressures and to make the city more resilient against economic and environmental challenges.

The plan proposes a series of goals and policies aimed at addressing these risks, including the promotion of mixed-use development, the preservation of historic properties, and the implementation of Complete Streets policies to enhance mobility for all modes of transportation. Emphasis is placed on creating pedestrian-friendly urban environments, increasing economic opportunities, and improving public access to natural resources.

Overall, "Map for Mobile" sets forth a vision of a more connected, sustainable, and resilient Mobile, detailing strategies to leverage the city's historical and cultural assets while addressing its infrastructural and environmental challenges. The document is a call to action for strategic planning and collective effort to ensure the city's growth is managed effectively and equitably.

3.5.2 MOBILE CITY-WIDE RESILIENCE ASSESSMENT AND PLAN

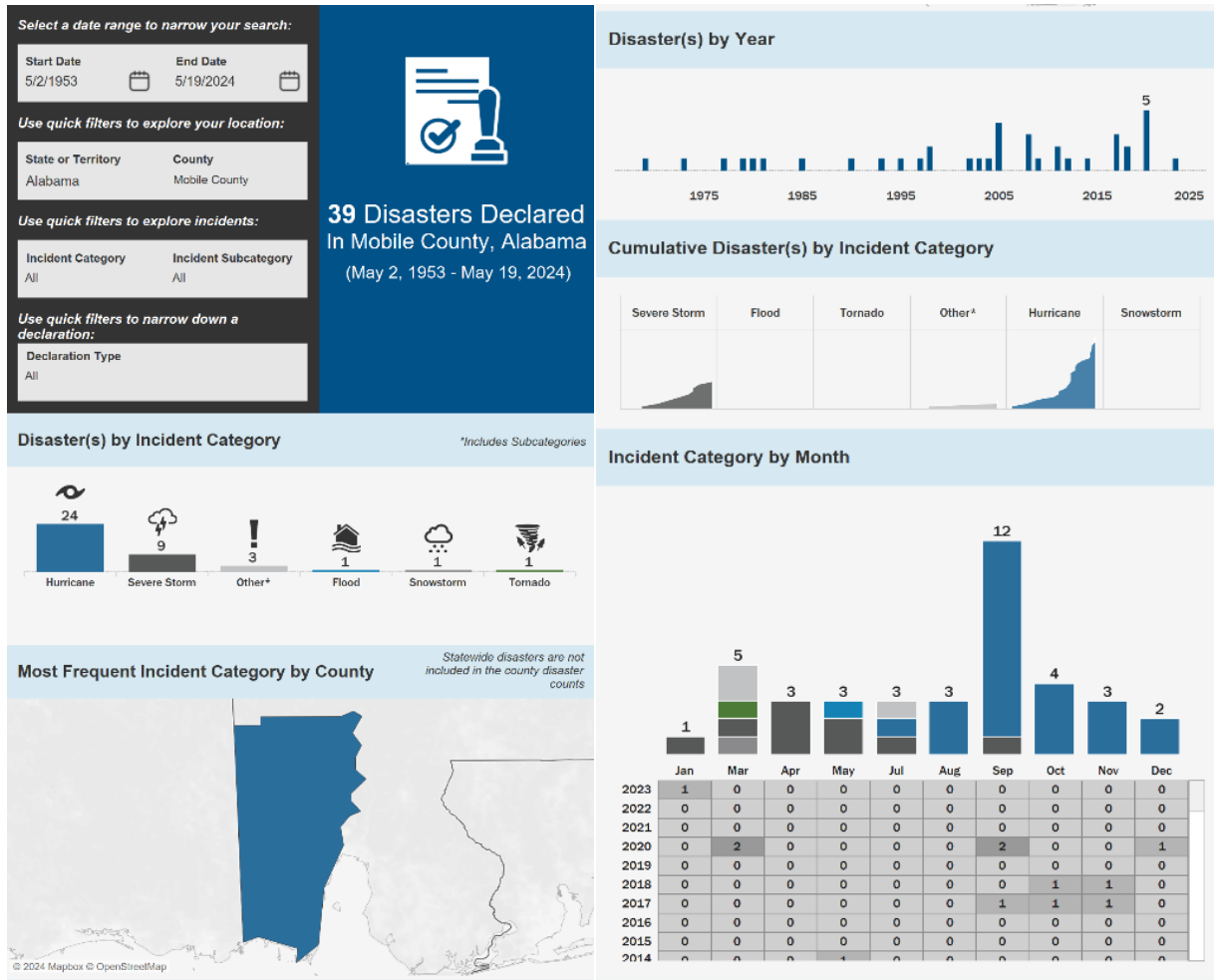
The City-Wide Resilience Assessment for Mobile is the first deliverable in an ongoing process of developing a comprehensive resilience strategy for the City of Mobile. The process focuses on comprehensively addressing the city's resilience by identifying and planning for various shocks and stressors, with the aim to fortify the city against future challenges. Throughout Mobile's history, it has encountered numerous disruptions that shape its resilience strategies, including extreme weather events, economic fluctuations, and infrastructure challenges.

Key hazards and risks identified in the assessment encompass a broad range of shocks and stressors. Shocks are acute, severe events that can cause immediate and significant damage, such as hurricanes, floods, and public health emergencies like the COVID-19 pandemic. Stressors, on the other hand, are chronic, ongoing issues that gradually undermine the city's resilience, including aging infrastructure, economic inequalities, and environmental degradation. These are compounded by climate change, which exacerbates existing vulnerabilities and introduces new challenges like sea-level rise and increased frequency of extreme weather events.

To address these concerns, the assessment outlines specific strategies centered around enhancing infrastructure, economic stability, health and wellbeing, community cohesion,

and natural resource management. It emphasizes the necessity for a holistic approach to planning and decision-making, integrating resilience into city operations and development plans. This includes risk-aware, forward-looking, and inclusive strategies that consider the unique needs and vulnerabilities of different community segments.

Figure 12: Disaster Declarations for States and Counties (Mobile County)



Source: OpenFEMA Disaster Declarations Summary dataset

The future-focused vision of the resilience plan is geared towards enabling all residents to thrive despite the increasing likelihood of challenging conditions. It involves a robust partnership among government, businesses, non-profits, and citizens to cultivate a resilient community that can adapt and recover from disruptions while improving overall quality of life and sustainability.

3.6 GREATEST RISK HAZARDS

The City determined the greatest risk hazards for the City of Mobile by cross referencing risk analyses from the State and Regional Hazard Mitigation Plans, as well as analyzing historical event data to verify these assumptions. Historic disaster declaration data is available at the County level and indicates that within Mobile County, there have been 39 Federally Declared Disasters declared since 1953. Of these, the vast majority (24) were hurricanes. Other indicated events from historic declarations include 9 for severe storms, 3 for “other” which include the COVID-19 Pandemic and 1 drought, 1 flood, 1 snowstorm, and 1 tornado.

In addition to the hazards experienced historically, the various Hazard Mitigation Plans identified the following as a comprehensive list of hazards for the Mobile area. Hazards in bold were identified as the greatest risk hazards with a “high” probability in the collected plans.

1. Coastal Erosion
2. Dam Failure
3. Drought / Extreme Heat
4. Earthquake
5. Flooding / Flash Flooding
6. High Winds (Hurricanes, Tornadoes, Windstorms)
7. Landslides
8. Land Subsidence / Sinkholes
9. Wildfire
10. Winter / Ice Storms

The table below estimates the hazard event frequency of occurrences cumulatively for the Regional HMP planning area, as estimated by the 2021 Division A Multi-Jurisdictional Hazard Mitigation Plan. These estimates were calculated from events recorded at different time periods, based on source data, which is described below. There is no guarantee the recorded level of hazard events will continue into the future at the same rate; however, the figures below provide a possible estimate of potential damages.

3.6.1 DROUGHT / EXTREME HEAT

The risk of losses from drought and extreme heat cannot be calculated due to the lack of historic data. Qualitative documentation shows evidence that drought and extreme heat conditions cause agricultural losses and water quantity issues, but it is difficult to define the exact impact from this hazard. The probability of drought and extreme heat occurring within the region is relatively high. The probability of an impactful drought or an extreme heat event occurring in the Regional HMP planning area is classified as medium (10-50 years).

Table 42: Disaster Declaration Summary for Mobile County (Disaster declarations for states and counties. FEMA)

Hazard	Occurrences	Time (Years)	Damages Recorded	Probability (Annual)	Estimated Future Damages (Annual)
Dam Failure	0	N/A	0	N/A	N/A
Drought / Extreme Heat	2	21	N/A	100%	N/A
Earthquake	21	47	N/A	45%	N/A
Flooding	94	21	\$38.7 M	100%	\$1.8 M
Hurricanes	18	42	\$12.6 B	43%	N/A
Tornadoes	102	6	\$12.9 M	100%	\$2.1 M
Severe Thunderstorms	600	6	\$11.7 M	100%	\$1.9 M
Landslides	N/A	N/A	N/A	N/A	N/A
Subsidence	N/A	N/A	N/A	N/A	N/A
Tsunamis	N/A	N/A	N/A	N/A	N/A
Wildfires	N/A	N/A	N/A	N/A	N/A
Winter Storms	15	26	0	58%	0

Source: National Climatic Data Center (NCDC), Alabama Forestry Commission

3.6.2 FLOODING

The division is subject to flash, riverine, and coastal flooding. Incidences and damages have been reported as a result of all three, but risks vary by jurisdiction. There have been 94 occurrences of flooding in the past 21 years, with an estimated cost in damages of over \$38 million in damages. Flooding is the third highest damaging hazard in the division.

3.6.3 HIGH WINDS

3.6.3.1 Hurricanes and Tropical Storms

Tropical cyclones are rotating, organized system of clouds and thunderstorms that originate over tropical or subtropical waters and have a closed low-level circulation. They are classified as follows:

- **Tropical Depression:** A tropical cyclone with maximum sustained winds of 38 mph or less.
- **Tropical Storm:** A tropical cyclone with maximum sustained winds of 39 to 73 mph.
- **Hurricane:** A tropical cyclone with maximum sustained winds of 74 mph or higher. In the western North Pacific, hurricanes are called typhoons; similar storms in the Indian Ocean and South Pacific Ocean are called cyclones.

- **Major Hurricane:** A tropical cyclone with maximum sustained winds of 111 mph or higher, corresponding to a Category 3, 4 or 5 on the Saffir-Simpson Hurricane Wind Scale.

Tropical cyclones forming between 5- and 30-degrees North latitude typically move toward the west. Sometimes the winds in the middle and upper levels of the atmosphere change and steer the cyclone toward the north and northwest. When tropical cyclones reach latitudes near 30 degrees north, they often move northeast.

The City of Mobile faces a high risk of hurricanes due to its location along the Gulf of Mexico. Storms can remain severe even several hundred miles inland, leading to heavy rains, flooding, high winds, and residual tornadoes. The Atlantic hurricane season extends annually from June 1st to November 30th.

Once a tropical system reaches hurricane strength, the Saffir-Simpson scale estimates potential property damage based on a hurricane's sustained wind speed. The scale gives a 1-5 ranking. Hurricanes rated Category 3 and higher are considered major hurricanes. They are associated with significant damage and loss of life.

Figure 13: Alabama Hurricane History (1852 - 2016)



Source: Division A Regional Multi-Jurisdictional Hazard Mitigation Plan 2021 – Phase Two

Since 1979, the Regional HMP planning area has experienced 18 hurricanes. The damage from only five of these storms (Frederic, Danny, Georges, Ivan and Katrina) exceeds \$12 trillion, making hurricanes the highest damaging hazard in the division. While hurricanes don't occur every year in the Regional HMP planning area, they are by far the most expensive natural peril and can cause the most widespread damage.

3.6.3.2 Tornadoes

The National Severe Storms Laboratory of the National Oceanic and Atmospheric Administration defines a tornado as “a violently rotating column of air in contact with the ground and extending from the base of a thunderstorm” (NSSL-NOAA 2021). The occurrence of tornadoes cannot be predicted, but past occurrences and basic weather patterns can be used to identify areas more susceptible. The National Weather Service defines a tornado as, “a violently rotating column of air in contact with the ground and extending from the base of a thunderstorm” (www.srh.noaa.gov/). The occurrence of tornadoes cannot be predicted, but past occurrences and basic weather patterns can be used to identify areas more susceptible.

All the City of Mobile is susceptible to tornadoes. Tornadoes have affected locations throughout the City. Tornadoes can occur throughout the year; however, the most likely time for occurrence is spring and fall. The spring tornado season in Alabama is March through May. There is a secondary season from November to December.

Since 1950, the Regional HMP Regional HMP planning area has experienced tornadoes almost every year. The Regional HMP planning area has had 102 occurrences of high wind events over the past 6 years. These occurrences have caused over \$12 million in damages, making it the second highest damaging hazard in the Regional HMP planning area , behind hurricanes.

3.6.3.3 Thunderstorms

A thunderstorm is a rainstorm accompanied by lightning and thunder. According to the National Weather Service there are four types of thunderstorms:

- Ordinary Cell: A single cell consisting of a onetime updraft and one-time downdraft. They are short lived and typically not severe.
- Multi-cell Cluster: Thunderstorms that form in clusters with numerous cells in various stages of development merging together.
- Multi-cell Line: Thunderstorms which form in a line which can extend laterally or hundreds of miles. Also known as “squall lines”, they can persist for many hours and produce damaging winds and hail. Tornadoes may form on the leading edge of squall lines, but they primarily produce “straight line” winds. Derechos are longlived strong squall lines that can travel hundreds of miles and can produce considerable wind and hail damage.
- Supercell: Highly organized storms characterized by updrafts that can attain speeds over 100 mph. They are able to produce large hail and strong, violent tornadoes that can produce damaging outflow in excess of 100 mph.

High winds are defined as winds 40 mph or greater lasting for an hour or longer, or winds of 58 mph or greater for any duration. High winds can lead to property damage and interruption in utility services. Trees may fall into homes and structures. Varying degrees of damage may

occur depending on the structure and size of the tree. Persons in these structures are at risk of death and injury. Trees can fall across power lines leading to outages that can last several days.

The entire City of Mobile is susceptible to the occurrence of severe thunderstorms. These events are assumed to be able to potentially affect any location due to their nature.

Severe thunderstorms are defined by the National Weather service as having winds of 58mph (50 knots) or higher. Severe thunderstorms with straight line winds, which occur throughout various locations in the Regional HMP planning area, have the potential to ignite wind gusts that are comparable to an EF1 tornado. It is difficult to predict the extent of damage and area will undergo due to the unpredictable nature of severe thunderstorms and the random impact of lightning and hail production.

From 1995-2019, 600 Thunderstorms have occurred in the region, and of those with recorded knots, 549 were considered severe (50 knots or greater). Total property damage from these 600 storms exceeds \$11,000,000. During the same time period, there were 326 hail and 104 lightning occurrences in the region. Only 19 of the hail occurrences caused any monetary damage, but the monetary value of property damage from lightning was over \$4,000,000 and resulted in 11 deaths.

The Regional HMP planning area experiences numerous severe thunderstorms each year. In the last six years, 600 severe thunderstorms have been recorded in the Regional HMP planning area with damages totaling over \$11 million and ranking the category the third highest damaging hazard in the Regional HMP planning area.

3.7 CRITICAL SERVICE AREAS AND COMMUNITY LIFELINES

Critical service areas or community lifelines refer to indispensable services that enable continuous operation of critical business and government functions in the wake of a disaster event, and are essential to human health and safety, or economic security. To best address unmet mitigation needs impacting emergency response and critical service areas, the City completed a quantitative analysis of significant potential impacts and risks of hazards affecting the following seven critical service areas listed below. In addition, note that these critical service areas are interdependent, and impacts in one service area are likely to result in cascading impacts across others.

1. Safety and security
2. Food, water, shelter, waste/sanitation
3. Health/medical
4. Energy (power and fuel)
5. Communications
6. Transportation
7. Hazardous Materials

The state's current Emergency Operations Plan (EOP) indicates both natural and technological hazards anticipated to impact critical service areas, including anticipated severity. Among the natural hazards assessed by the plan, Flooding, High Wind Events, and Sea Level Rise were identified as the highest risk *and* highest impact events facing the State of Alabama.

3.7.1 CRITICAL SERVICE AREA 1: SAFETY AND SECURITY

Major and catastrophic disasters will result in widespread damage to or total loss of extant civil infrastructure capabilities. Along with a significant loss of dwellings and other structures and widespread displacement of people, State and local authorities will require law enforcement assistance to provide traffic control, access control, and security at mass care facilities. To fully determine the magnitude of a disaster on population and provide an immediate and effective response, an impact/needs assessment will be conducted at the earliest possible time, following a major or catastrophic disaster. Staffing needs for both state and local emergency response personnel increase before, during, and after a major natural disaster event, thus many jurisdictions must implement curfews, road restrictions, and/or evacuation orders as a public safety measure to reduce traffic, protect lives and property, and allow emergency responders better access to the affected areas.

Implementation of mitigation programs will stabilize local safety and security and reduce the need for law enforcement, search and rescue, first responders and government services during and immediately after a disaster event.

3.7.2 CRITICAL SERVICE AREA 2: FOOD, WATER, SHELTER, WASTE/SANITATION

Major natural disaster events put extreme strain on local government's ability to maintain supply chains for food, public utilities like water and sewer, and the ability to shelter residents and maintain sanitation services.

3.8 RISK DISTRIBUTION AMONG LMI OR OTHERWISE VULNERABLE COMMUNITIES AND PROTECTED CLASSES

With respect to vulnerable populations, there are only two jurisdictions, Dauphin Island and Semmes, in which over 20% of the population is aged 65 and older. Older individuals are generally accepted to have higher vulnerability to hazards due to lessened physical and often mental capacity.

Additionally, lower income individuals are classified as having higher vulnerability due lack of resources to prepare and to recover from disasters. The jurisdictions that have at least 20% of their population living below the poverty line include Bayou La Batre, Chickasaw, Citronelle, Creola, Mobile, Mount Vernon, and Prichard.

The type of housing is also a factor for vulnerability, specifically mobile homes. While Creola is the only jurisdiction in the county where mobile homes account for more than 20% of the housing stock, it is important to note that any mobile home is more susceptible to hazards, especially high winds.

Group living facilities such as assisted living facilities and nursing homes have higher population density which make them more vulnerable to hazards. More density can lead to difficulties evacuating if necessary, and greater injury or loss of life. These locations are more vulnerable to High Wind Events such as Hurricanes, Tornadoes, and Severe Thunderstorms as well as Wildfires.

Many factors influence jurisdiction's vulnerability to flooding and flash flooding. There are floodplain areas located throughout the county (refer to Figure 3.3). All municipalities and counties in the region participate in the NFIP, but the smaller jurisdictions do not have certified floodplain managers. Flash flooding vulnerability exists throughout the county and is influenced by multiple areas throughout the county that flood due to nonexistent, undersized, or deteriorated drainage infrastructure. Coastal areas of the county are especially vulnerable to flooding due to elevation and a higher risk of hurricanes.

Important industries in the county include shipbuilding, government and education (including college). High Wind Events (Hurricanes and Tornadoes) and flooding could have a devastating impact of both of these industries, and wildfires could be devastating for the agricultural industry with respect to timber. All of these hazards can affect other industries as well, with issues such as damage, power outages and impassable roads, affecting other major industries in the county such as retail and tourism.

Although many critical facilities have backup power generation in the county, there are still a significant number in need of this capability. The lack of this capability increases vulnerability to all hazards. Most of the jurisdictions in the county have limited to no funding to support mitigation efforts. This lack of funding to dedicate to mitigation projects influences its' vulnerability to all hazards. Many areas in the county have limited cellphone service, many individuals depend on their phones to alert them to severe weather. The limited coverage makes these individuals more vulnerable to severe thunderstorms, flash flooding events, and tornadoes.

4 MID RECOVERY ZONES

4.1 OVERVIEW

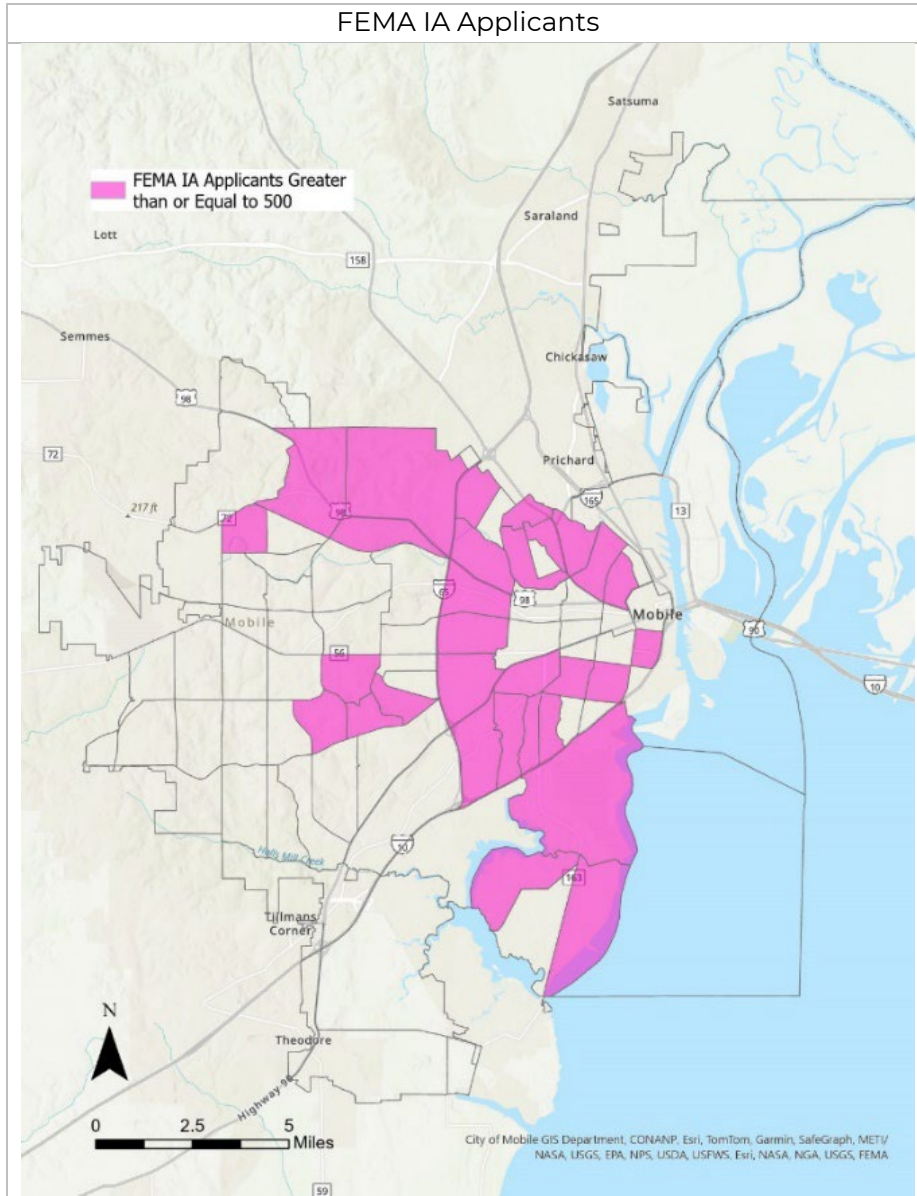
The City of Mobile is classified by HUD as a Most Impacted and Distressed (MID) area due to Hurricanes Sally and Zeta. This designation is noted in 87 FR 6364 and ADECA's *2020 Public Action Plan*. Following this designation, the City conducted an in-depth assessment to identify MID Recovery Zones based on disaster impacts and various other factors.

As outlined in the Local Recovery Planning Program (LRPP), MID Recovery Zones are specific areas within the MID counties identified through local unmet needs assessments as both heavily impacted by disaster and made up of the most vulnerable populations. The goal of these zones is to centralize recovery and mitigation efforts, directing actions toward reducing future risks, preparing for disasters, and supporting the most vulnerable populations.

To establish MID Recovery Zones, both vulnerability and disaster impact were considered. Several high social vulnerability regions were heavily impacted by disasters. The following spatial layers were overlaid to determine the MID Recovery Zones:

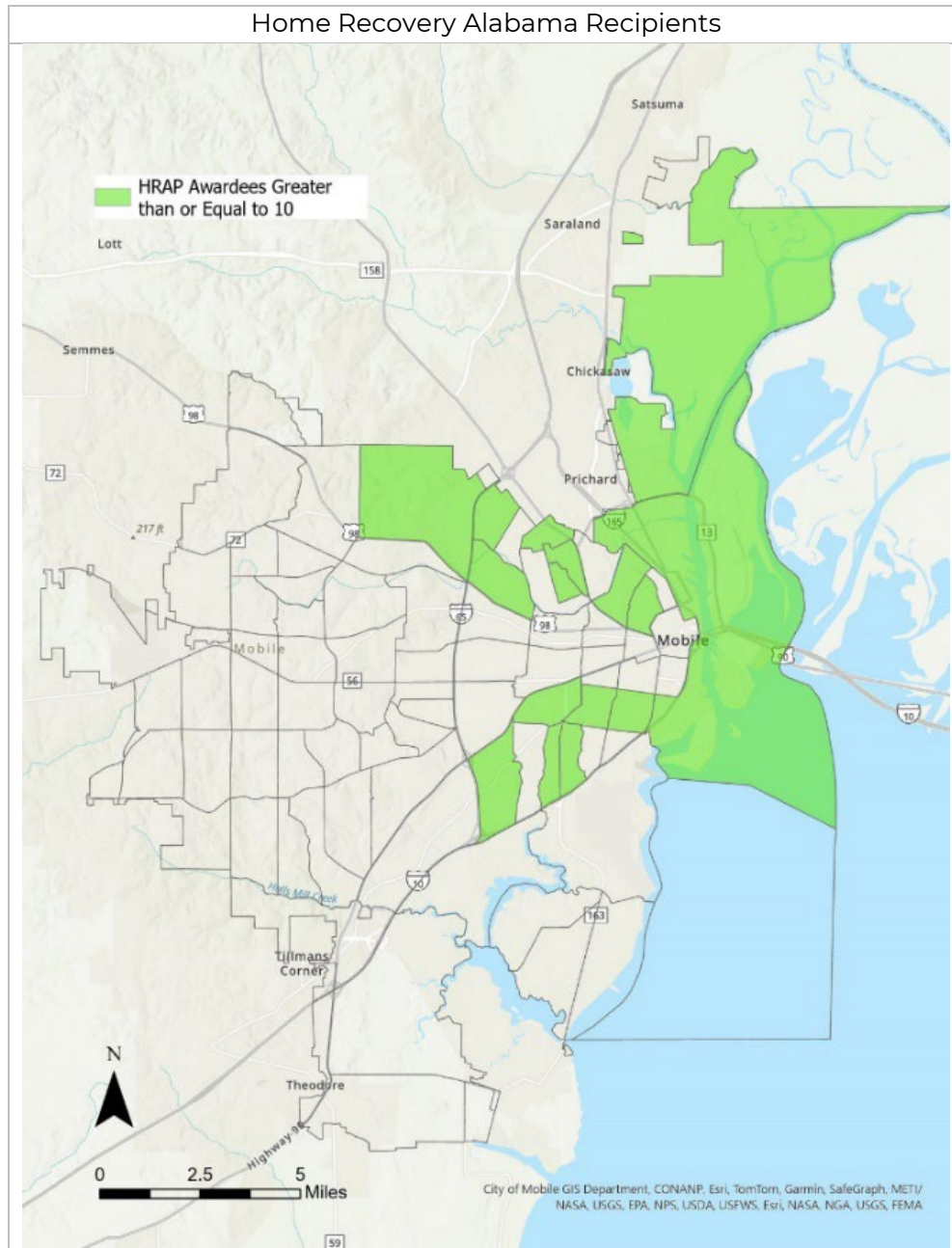
- Census tracts with 500 or more FEMA IA applicants (Section 2.1.2)
- Census tracts with 10 or more Home Recovery Alabama (HRAP) program participants
- Census tracts with a CDC Social Vulnerability Index in the 50th percentile or greater (Section 2.4.2.2)
- Census tracts with 51% or more low- to moderate-income (LMI) households (Section 2.4.2.2)
- Census tracts with 50% or more experiencing housing burden, from the Climate and Economic Justice Screening Tool (Section 2.1.1)

Figure 14: MID Recovery Zones Criteria Layer 1



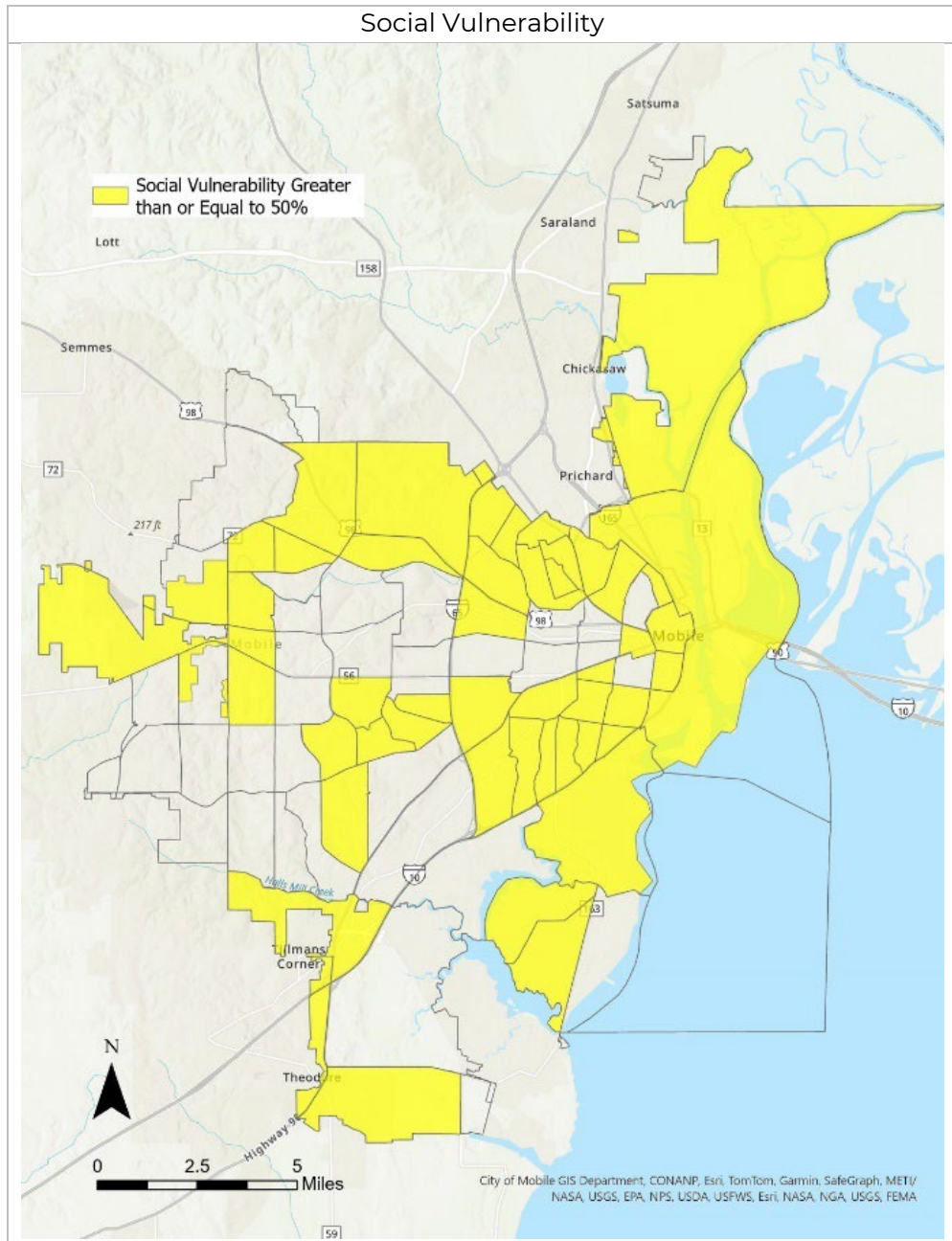
Source: FEMA IA (2020)

Figure 15: MID Recovery Zones Criteria Layer 2



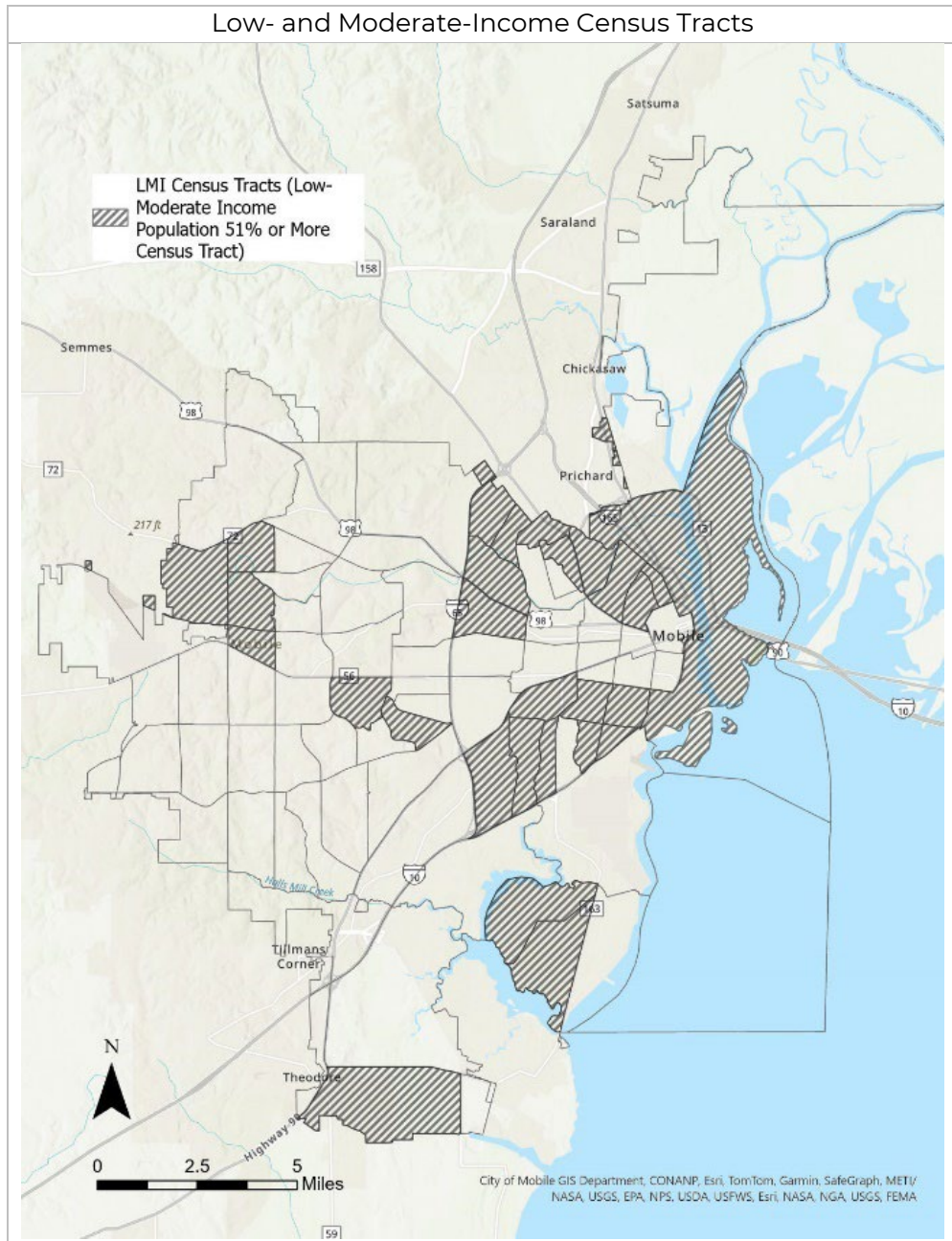
Source: Home Recovery Alabama (2024)

Figure 16: MID Recovery Zones Criteria Layer 3



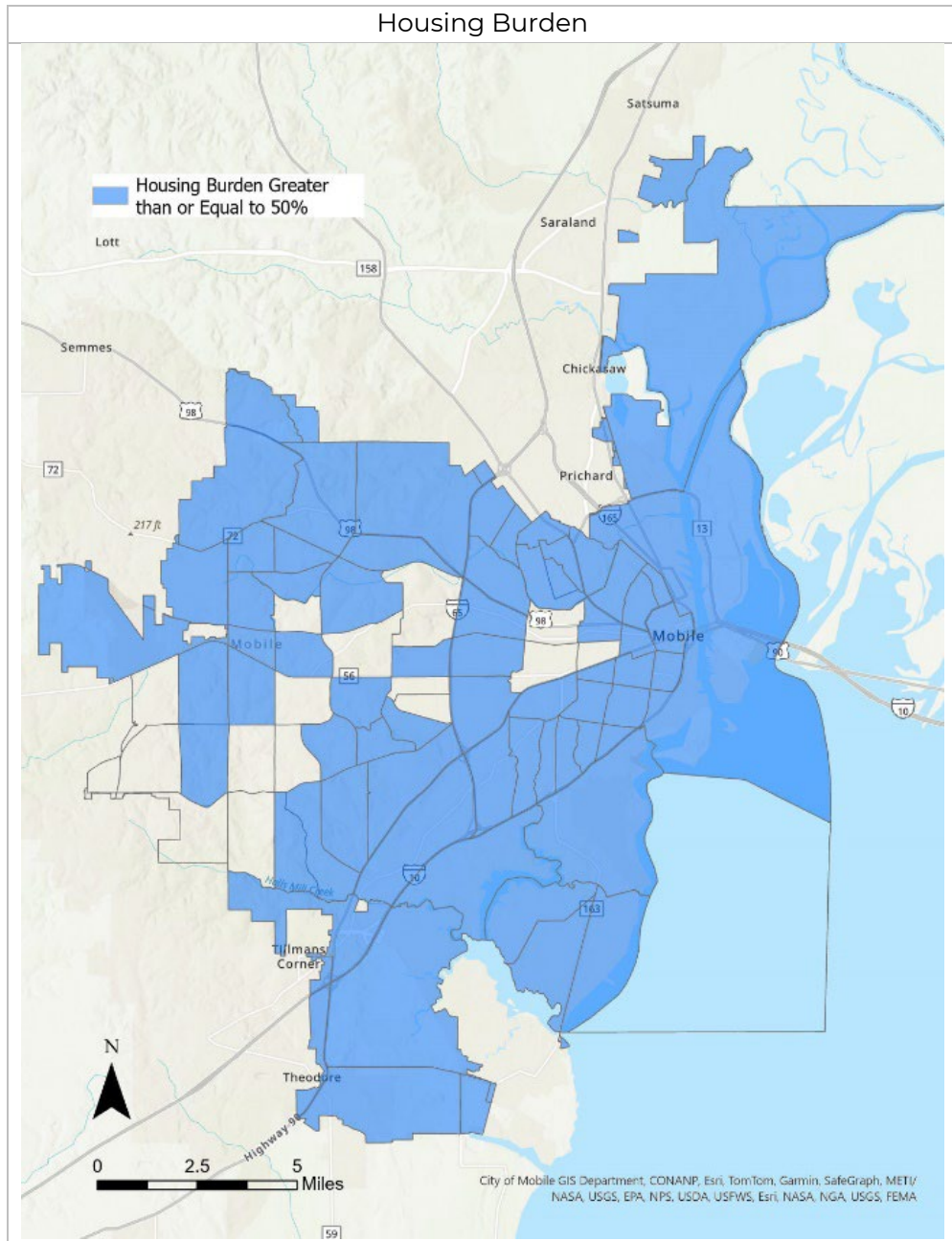
Source: CDC (2022)

Figure 17: MID Recovery Zones Criteria Layer 4



Source: HUD (2022)

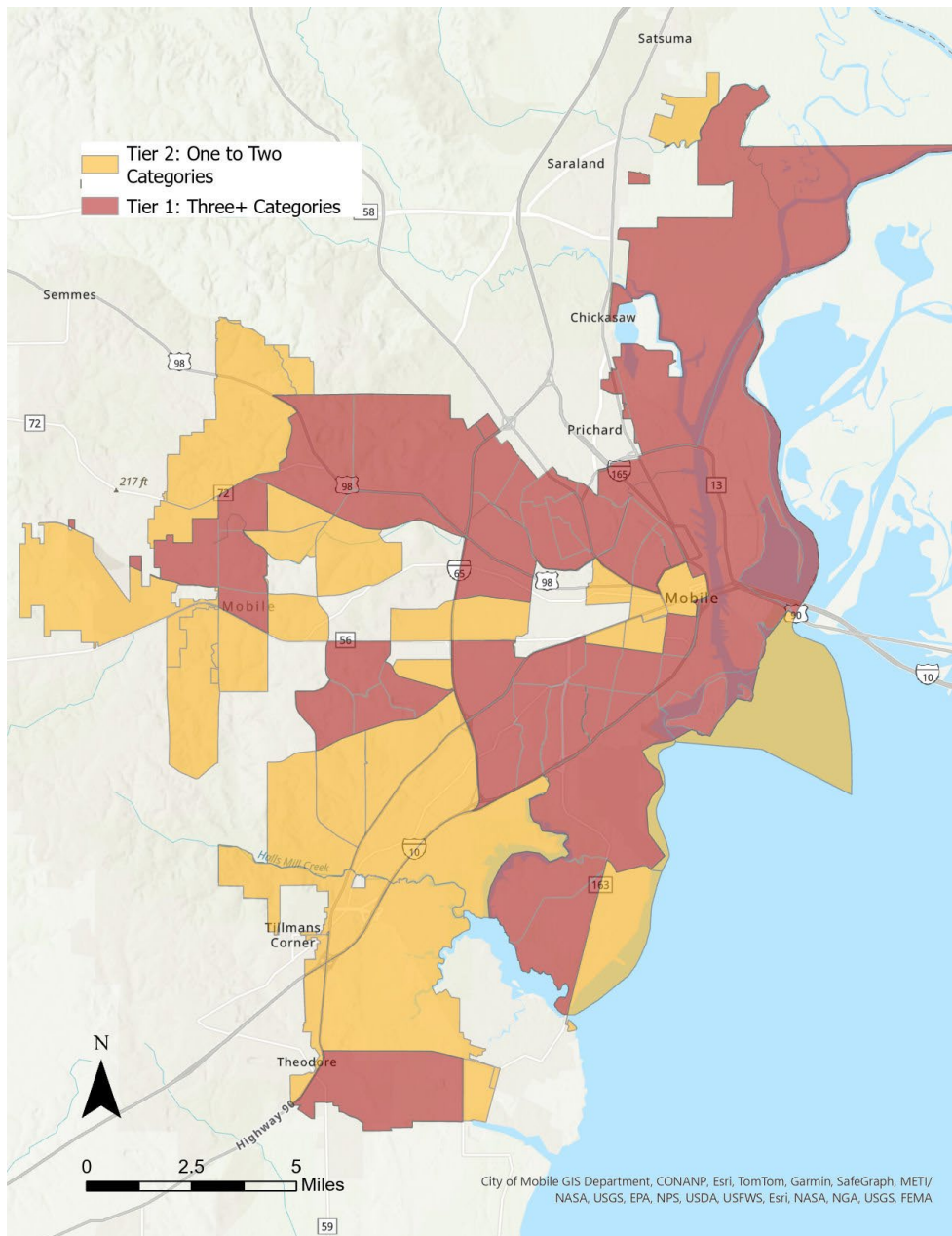
Figure 18: MID Recovery Zones Criteria Layer 5



Source: Council on Environmental Quality (2022)

The MID Recovery Zones map below shows the number of criteria (one to two; three to five) met by each census tract within the City of Mobile (Figure 19). Census tracts meeting at least three of the criteria are concentrated in the eastern and central portions of the city and along the coast.

Figure 19: MID Recovery Zones, City of Mobile



Source: FEMA IA (2020); Home Recovery Alabama (2024); HUD (2022); CDC (2022); Council on Environmental Quality (2022)

As the entire City of Mobile is a HUD-designated MID area, CDBG-DR programming within the city will reach those persons most impacted and with unmet needs from the disasters. In addition, projects will directly address the needs of communities in MID Recovery Zones, regardless of project location.

5 PROPOSED ACTIVITIES

5.1 OVERVIEW

As noted under Section 1.4, the City of Mobile will address remaining impacts from Hurricane Sally and Hurricane Zeta through programs that meet the greatest needs in the housing and infrastructure sectors to support a stronger recovery in future disaster events. The City, however, proposes to divide its \$53,149,037 CDBG-DR allocation in a modified ratio under the two approved sectors:

8. **Housing activities via the Affordable Rental Housing Development Program:** \$32,334,137 – the City of Mobile anticipates utilizing this proposed allocation on affordable rental activities; and
9. **Infrastructure (Non-Housing) activities via the Priority Infrastructure Program:** \$20,814,900 – the City of Mobile anticipates utilizing this proposed allocation on large-scale infrastructure projects which increases resilience in hard-hit areas and can demonstrate an impact on predominantly LMI communities. The City may also connect these activities with and to enhance its disaster recovery housing activities and to further resilience and mitigation-only activities in areas where outcomes of such a project are most critical.

The mitigation set-aside (\$7,972,355) will be met through activities under the Priority Infrastructure Program.

This modified allocation more closely aligns with the current unmet needs determined by the City and will allow for the CDBG-DR allocation to have the most impact on long-term disaster recovery efforts in the area.

Table 43: Unmet Needs Breakdown by Recovery Sector, Mobile County and City of Mobile

Sector	Housing	Infrastructure	Economic	Total
Mobile County 2023 ⁴³	\$450,072,015	\$992,030	\$16,512,487	\$467,576,533
City of Mobile (2024 Update ⁴⁴)	\$461,525,804	\$5,189,004	\$30,519,767	\$497,234,575

⁴³ Table 54: Unmet Needs Breakdown by Recovery Sector and County; <https://adeca.alabama.gov/wp-content/uploads/DRGR-Public-Action-Plan-Non-Substantial-Amendment-2.pdf>

⁴⁴ Updated Unmet Needs analysis from the City's LRP – see Tables 12, 13, and 18 above.

Table 44: Unmet Needs Summary by Sector, Approved Budget Allocation by Sector, and Proposed Budget Allocation by Sector, City of Mobile

Sector	Updated Unmet Needs per Sector ⁴⁵	% of Updated Unmet Needs	Approved Budget Allocation per Sector ⁴⁶	% of Total Budget	Proposed Budget Allocation per Sector	% of Total Budget
Housing	\$461,525,804	92.8%	\$23,557,014	44.3%	\$32,334,137	60.8%
Infrastructure	\$5,189,005	1.1%	\$29,592,023	55.7%	\$20,814,900	39.2%
Mitigation Set-aside			\$7,972,355	15%	\$7,972,355	15%
Economic Revitalization	\$30,519,767	6.1%	\$0	0.0%	\$0	0.0%
Total	\$497,235,375	100.0%	\$53,149,037	100.0%	\$53,149,037	100.0%

Additionally, the proposed activity budget modification to the City's allocation to increase support for more housing activities further aligns with minor changes to the City's incorporated limits in 2023, as described under ADECA's 2020 DR Action Plan Amendment #2⁴⁷. The proposed, increased use of CDBG-DR dollars to support housing activities will provide additional resources to address the increase in priority populations and their needs as described further in Section 5.3 and noted in the table below.

Table 45: Change in Mobile City Formula Allocation

HHMID	RPFVL	RPFVL Percent	Medium SoVi Pop	Medium SoVi Percent	High SoVi Pop	High SoVi Percent	Average of Factors
Mobile City (Current Values)	\$28,603,062	62%	105,160	62%	53,832	72%	65%
Mobile City (New Values)	\$29,635,795	64%	108,279	63%	53,832	72%	66%

Source: ADECA's non-substantial Action Plan Amendment #2

5.2 PROGRAM PRIORITIES

The proposed housing and infrastructure programs, and their respective methods of distribution as described in the City's Local Recovery Plan, are intended to address the

⁴⁵ Based on the City of Mobile's 2024 updated Unmet Need analysis (Table 33).

⁴⁶ Per Table B: Change in Mobile City and County Allocation Amounts, <https://adeca.alabama.gov/wp-content/uploads/DRGR-Public-Action-Plan-Non-Substantial-Amendment-2-Summary-of-Changes.pdf>

⁴⁷ Ibid., Section 2. Summary of Changes and Table A: Change in Mobile City and County Formula Allocation.

remaining recovery needs in the housing and infrastructure sectors by using the funds available to achieve the greatest outcomes. Programs in this plan were designed to the needs and priorities of the community, the City's capacity to implement, and the timeline of the City's CDBG-DR award.

Recovery programs in this plan require that subsequent activities:

- Meet an eligible activity under CDBG-DR regulations and within the City of Mobile's LRP
- Meet a National Objective
- Have a clear "storm tie-back" or relation to Hurricanes Sally or Zeta
- Address direct or indirect disaster-related impacts

In addition to City of Mobile's program guidelines for the Local Recovery Plan which are prescribed through ADECA's 2020 DR Action Plan, these CDBG-DR funds are also guided by federal requirements posted in the February 3, 2022 (87 FR 6364) and May 24, 2022, (87 FR 31636) Federal Register Notices for Public Law 117-43, which addressed 2020 disasters.

Priorities for funding will be determined within each program and comply with HUD, State, and the City's requirements and priorities for serving low-to-moderate (LMI) income households and the most impacted and distressed (MID) areas (which includes considerations for vulnerable populations). Additionally, programs will need to consider cost reasonableness and feasibility as part of program design and project selection to ensure CDBG-DR funds are used effectively and appropriately.

Program Criteria

While each program has its own requirements and criteria which the City will utilize in project selection and distribution of funds, there are several criteria that apply across the City's CDBG-DR allocation.

1. All programs will seek to serve:
 - Current residents within the City of Mobile's incorporated limits.
 - Former residents of the City's limits who were displaced directly or indirectly by the disaster.
 - LMI and vulnerable populations: LMI will be determined based on household income and current income limits as determined by HUD (Table 47). For details on vulnerable populations, reference Section 2.4.2.2.

Table 46: Low and Moderate Income (LMI) Limits, Mobile County, 2024

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Very Low <50% AMI	\$26,600	\$30,400	\$34,200	\$38,000	\$41,050	\$44,100	\$47,100	\$50,200
Low <80% AMI	\$42,600	\$48,650	\$54,750	\$60,800	\$65,700	\$70,550	\$75,400	\$80,300

Source: HUD FY 2024 Income Limits Summary

2. The MID Recovery Zones, as identified in section 4.1, will be given priority consideration as long as all other program requirements are also appropriately met. The MID Recovery Zones, as developed, include considerations for vulnerable populations.
3. Projects selected will need to be able to meet the timelines identified within the program's guidelines.
4. Where possible, programs will consider projects with proposed activities that may address hazard mitigation risks and impacts in future disasters.

These identified program priorities will ensure the City of Mobile is providing CDBG-DR funds to areas and individuals that were most impacted and support the City of Mobile's recovery needs. Projects considered under any program within the City's LRP, whether managed by the City or another entity (e.g., developer, etc.), must demonstrate how activities meet program priorities as part of project documentation.

Cost Reasonableness

As part of compliance with HUD CDBG-DR requirements and cost principles described in the Uniform Administration Requirements under 2 CFR 200, the City will only approve projects that can reasonably support cost feasibility. Each project will need to provide sufficient evidence to support project costs as reasonable, necessary, and allocable for CDBG-DR funding.

- **Cost Reasonable:** A cost is reasonable if it, in its nature and amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the City's project is predominantly federally funded. In determining reasonableness of a given cost, consideration must be given to:
 - Whether the cost is of a type generally recognized as ordinary and necessary for the City in the proper and efficient performance of the Federal award.
 - The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.
 - Market prices for comparable goods or services for the geographic area.
 - Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities, its employees, where applicable its students or membership, the public at large, and the Federal Government.
 - Whether the City significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.
- **Necessary and allocable:**
 - Costs must be shown to be necessary to the milestones, completion, and outcomes of the project.

- Costs must be eligible under CDBG-DR and LRP guidelines and be incurred specifically for the purposes of the project during the award period of performance.

Projects under either the Affordable Rental Housing Development Program or Priority Infrastructure Program that cannot be reasonably managed by the City and cannot demonstrate that costs are reasonable and necessary will not be considered for CDBG-DR funding.

5.3 CONNECTION TO UNMET NEEDS

The following sections outline programming which most appropriately utilizes the limited amount of CDBG-DR funding in consideration of the unmet and mitigation needs of the City of Mobile. As noted in Table 45, the total unmet need for the City's recovery from the damages of DR-4563 and DR-4573 is \$497,234,575. Of that unmet need, 92.8% of the remaining need is for housing, 1.1% is for infrastructure recovery, and 6.1% is for economic development. The City of Mobile proposes programming under infrastructure and affordable rental housing to best meet those remaining needs.

As shown under Sections 2.1.1. and 2.1.4., Hurricane Sally and Hurricane Zeta deepened long standing issues in affordable rental housing within the City of Mobile. The City contains a housing stock which is significantly older than the average housing stock in Alabama, with a significant portion of that stock which was built prior to 1979 and is at greater risk of hazard damage. Renters were particularly vulnerable to the damages from both Hurricanes. In 2022, 18,796, or 55%, of all renter-occupied households in Mobile had a housing cost burden in which housing costs were 30 percent or more of annual household income compared to 8,764, or 22%, of homeowners under a similar scenario. Cost-burdened households face increased financial precarity and risk of missing a rent or mortgage payment and are therefore especially vulnerable to financial shocks and disasters. Many census tracts in the east of the city are in the 90th and above percentile for housing cost burdens nationwide. There were also significantly more FEMA-IA (FEMA Individual Assistance) renter applications than owner applications, with 25,579 total renter applications, more than half of which revealed damage when inspected. Furthermore, the Mobile Housing Authority has plans to take offline three public housing development by 2026, reducing overall public housing stock by 50 percent and further limiting access to affordable rental units.

FGAs shown in the infrastructure unmet needs section, Hurricane Sally and Hurricane Zeta also revealed existing infrastructure vulnerabilities in the City with downed power lines, the closure of the port, and widespread debris and damage. The majority of FEMA-Public Assistance costs to respond to infrastructure damages were for debris removal (\$13,583,433). While infrastructure is only 1.1 percent of overall unmet needs damages, state and regional hazard mitigation plans show that Mobile has high exposure and vulnerability to continued disasters such as coastal and flash flooding. The eastern portion of the city around the coast has a flood risk which is largely above the 90th percentile for the country. As shown in Section 2.4.2.2, the census tracts with the highest concentrations of vulnerable populations are in the eastern portion of the City, which can further complicate recovery from future flooding. The

entire city has an estimated building loss rate – the economic loss to building value resulting from natural hazards each year – which is in the 96th to 97th percentile for the country. The vulnerability to flash flooding is worsened by nonexistent, undersized, or deteriorated drainage infrastructure throughout the region. Furthermore, there is a lack of available funding to support city mitigation projects. Section 2.4.2.1 shows that there are 13 Racially and Ethnically – Concentrated Areas of Poverty census tracts within the City, but as shown in Figure 6, a small number of FEMA IA applicants came from these census tracts. The high hazard vulnerability necessitates infrastructure investments which aid in the continuous and adaptive mitigation efforts to protect and enhance community resilience, while prioritizing projects in the most vulnerable census tracts. Throughout the public engagement process, residents and stakeholders voiced the need for better drainage infrastructure and other mitigation measures, as well as public education surrounding mitigation and resilience.

Through the proposed housing and infrastructure activities, the City anticipates utilizing CDBG-DR funding towards:

1. Affordable rental housing to lessen impacts of the housing burden of renters.
2. Development of disaster recovery and resilient infrastructure projects that can serve a dual purpose of supporting affordable rental housing development and creating mitigation measures (e.g., flood control structures) to lessen the impact of damage in the event of future disasters.

5.4 PROGRAM DETAILS

5.4.1 AFFORDABLE RENTAL HOUSING DEVELOPMENT PROGRAM

5.4.1.1 Activity Description

The Affordable Rental Housing Development Program aims to address the demand for rental housing and create additional affordable housing units. Funding will support the rehabilitation, reconstruction, and new construction of affordable housing units in areas affected by DR-4563 and DR-4575. These affordable units will be available to low-income and moderate-income individuals and families who were impacted and displaced by the storms.

5.4.1.2 National Objective

Following the guidance set forth in 24 CFR 570.483 and the alternative requirements in the Federal Register allocation notices (87 FR 6364 and 87 FR 31636), as outlined in ADECA's 2020 *DR Action Plan*, the rental program will include activities that meet the housing category of the Low-to-Moderate Income national objective.

LMI national objective: Benefiting low- and moderate-income persons.

- Low-to-Moderate-Income Housing (LMH) applies when the renting household has an income at or below 80% of the Area Median Income (AMI). For activities to qualify under

this objective, permanent residential structures must be occupied by an LMI household.

- If a structure contains one dwelling unit, it must be occupied by an LMI household.
- If a structure contains two dwelling units, at least one unit must be occupied by an LMI household.
- For properties with three or more units, at least 51% of the units must be occupied by LMI households.

5.4.1.3 Eligible Activity

This program will support the development of affordable housing units within the City of Mobile, specifically,

- HCDA Section 105(a)(4) – Clearance, rehabilitation, reconstruction, and construction of buildings (including Housing): Authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).
- New housing construction: Per the Consolidated Notice waiver and alternative requirement, 42 U.S.C. 5305(a) and 24 CFR 570.207(b)(3) are waived to the extent necessary to permit new housing construction, subject to the following alternative requirement. When CDBG–DR funds are used to carry out a new housing construction activity, 24 CFR 570.202 shall apply and shall be read to extend to new construction in addition to rehabilitation assistance. Private individuals and entities must remain compliant with federal accessibility requirements as well as with the applicable site selection requirements of 24 CFR 1.4(b)(3) and 8.4(b)(5).

The form of the award will be proposed by applicants and ultimately negotiated between successful applicants and the City to ensure project viability, adherence to federal cost principles, and limit undue enrichment.

5.4.1.4 Eligible Costs

This program provides funding for costs related to the implementation of eligible housing activities, in accordance with program requirements and specific project financing needs. Eligible costs include:

- Pre-development costs directly tied to the project, including preparation of environmental analysis and reports
- Architectural and engineering design
- Permitting fees
- Developer fees
- Mobilization, site prep, and cleanup costs
- Construction, Reconstruction or Rehabilitation costs
- Land and building acquisition costs (case-by-case basis)

Ineligible costs include:

- Pre-disaster costs and application development costs
- Advances of any type, including construction
- Operating or maintenance expenses
- Offsite improvements
- Costs prohibited by federal or HUD regulations

5.4.1.5 Eligibility Criteria

The City is looking for affordable housing proposals that will have a significant impact, be cost-effective, be project-ready (completed and occupied within approximately 14 months of fund commitment) and leverage additional funding from public and private sources. This program will consider funding awards to proposals from eligible applicants for eligible projects as follows.

Eligible Applicants/ Developers

- For-profit entities and not-for-profit organizations may apply.
- Applicant must demonstrate development capacity, experience, financial stability, and good standing with prior awards.
- Applicant must comply with all applicable City, County, State, and HUD/Federal requirements, including environmental reviews, Section 3, prevailing wage, Uniform Relocation Act, as applicable.
- Applicant must be eligible to receive federal funds, and not debarred, suspended, or otherwise prohibited from participating in a federal award.

Eligible Projects

- Located within the City of Mobile.
- 5 or more rental units under common ownership and management
- Meet a National Objective by providing at least 51% affordable units in the project.
- Align with the housing priorities outlined in the City's 2023-2027 Consolidated Plan.
- Developer willingness to accept tenant vouchers and project-based vouchers from Housing Authority, as practical and available.
- Comply with all applicable City, County, State, and HUD/Federal requirements including environmental reviews, Section 3 and the Davis Bacon Act, Green and Resilient Building Standards, and Elevation Standards.
- Offer units at or below City-approved "affordable rents", as evidenced through a deed restriction on the awarded project and annual reporting, for the affordability period.
 - "Affordable rents" are rents that do not exceed the lesser of either the High HOME Rent Limits adjusted for the number of bedrooms in the unit, and location of the property or thirty percent (30%) of the adjusted gross income of household.
- Manage the project, demonstrate financial viability, and ensure compliance for HUD's affordability requirements by leasing assisted units at affordable rents (Table 48)

Table 47: HUD Required Affordability Requirements for Rental Units

Rental Assistance amount per-unit	Minimum affordability period
<\$15,000	5 years
\$15,000-\$40,000	10 years
>\$40,000	15 years

Source: 24 CFR 92.254(a)(4)

The City intends to prioritize projects that:

- Are located within the City’s Tier 1 MID Recovery Zones, which are identified by three or more vulnerability and disaster impact criteria..
- Leverage funding from public and private sources and are cost effective.
- Prioritize the needs of vulnerable populations by
- Siting units in locations near closing/closed public housing authorities.
Provide affirmative marketing plans that demonstrate robust practices to outreach to those least likely to apply, including protected classes, based on the best available demographic data
- Are multifamily projects that provide a greater number of affordable units.
- Have a realistic and feasible pathway to complete construction quickly and achieve occupancy within the City’s grant expenditure timelines as established and amended by its agreement with ADECA..

5.4.1.6 Tieback to the Storm

The program will support recovery from the disaster impacts by funding the repair, reconstruction, or replacement of affordable housing units that were damaged or destroyed by DR-4563 and DR-4575.

The program will allow for new construction to expand the housing supply as allowed by HUD waiver and alternative requirement. Expanding the housing supply through the development of new units and projects is key to the recovery effort. Many damaged properties may not recover in a timely manner due to site specific challenges around ownership, title, financing, and owner interest. New units can help fill the housing needs from damaged units and pre-disaster housing shortages.

5.4.1.7 Feasibility

City of Mobile’s Neighborhood Development Department is well versed in awarding federal funds to affordable housing developers as a HUD entitlement community and has operated similar programs using other federal funding sources. This program can be quickly developed and deployed following approval, as it will be deployed with the City’s existing experience, processes, and systems for housing development. This experience includes staffing who can ensure project feasibility through underwriting reviews, assessments of developer capacity and fiscal soundness, and examination of neighborhood market conditions to ensure adequate need and funding for each project.

Additionally, the City has an existing developer community that understands the rules and regulations associated with federal funding who will be well positioned to submit projects for consideration.

5.4.1.8 Budget

The program will provide up to \$32,334,137 in awards to qualified applicants for specific projects. This will require an increase of \$8,777,123 from the housing activities budget as outlined in the approved ADECA allocation under Amendment #2 in the *2020 DR Action Plan*. The program does not have project award cap. Additionally, the City may utilize activity delivery costs in support of implementing these housing activities, which are expected to cost between 10 and 15 percent of the proposed allocation.

Budget Category	Funding Level
Affordable Rental Housing Development Program	\$32,334,137

The program uses the most recent HUD HOME Per Unit Subsidy Limit, which is based on the Federal Housing Administration's Basic Statutory Mortgage Limits, Section 234, to assess per-unit cost reasonableness, and seeks projects that provide the best value and leverage for the recovery investment. The program may consider per-unit investments beyond the HOME limit as related to accessibility, green and resilient building standards, and energy efficiency if sufficiently demonstrated and documented by the applicant.

5.4.1.9 Timeline and Readiness

The program is built on existing processes and systems within the City's Neighborhood Development Department, allowing the program to quickly launch an application process.

To ensure adherence to the overall grant timeline and requirements, the City will prioritize projects that can quickly be entitled, permitted, and developed. Neighborhood Development Department staff will support awarded applicants through the City's entitlement process to facilitate timely project starts.

5.4.1.10 Partners

The program will work with the Mobile Housing Authority to facilitate the placement of project-based vouchers and outreach to voucher holders for funded projects.

5.4.2 PRIORITY INFRASTRUCTURE PROGRAM (PIP)

5.4.2.1 Activity Description

The City of Mobile's Priority Infrastructure Program (PIP) will address and prioritize infrastructure recovery needs that have substantial, community-wide impacts across predominantly LMI areas and vulnerable populations (including protected classes, socially vulnerable, and historically disadvantaged populations) affected by DR-4563 and DR-4575. With the proposed CDBG-DR allocation for the PIP, the City anticipates conducting no more than 5 projects, or activities, under this program, some of which may have mitigation- or resilience-only benefits and are not tied back to specific disaster recovery efforts.

The PIP may include the following project types:

- Road improvements
- Drainage improvements
- Public facilities repair and reconstruction
- Demolition of buildings for reconstruction
- Resilient flood control structure(s) development and improvements
- Public amenities development and improvements (including landscaping, driveways, and sidewalks)

In addition, in line with ongoing discussions with the County EMA, the PIP may include mitigation-focused activities to support preparedness and response operations in the City of Mobile. Specific activities addressing identified needs, including expansion of emergency sheltering and staging capacity and capabilities, have been raised and there is ongoing coordination to determine the most effective means to support the City's long-term resilience.

The City will also consider how activities under this program could further support its Affordable Rental Housing Development Program.

The Neighborhood Development Department anticipates reviewing its potential infrastructure disaster recovery project funding needs, which it will then consider for PIP funding. As noted within and extended from Section 5.2, projects which can reasonably address the City's infrastructure recovery and storm mitigation needs and demonstrate the most substantial disaster recovery and resilience impact will be prioritized. After this project review of recovery and mitigation impact, eligibility, and prioritization, the City will recommend proposed projects to the City's administration for funding under this program.

5.4.2.2 National Objective

Following the guidance set forth in 24 CFR 570.483 and the alternative requirements in the Federal Register allocation notices (87 FR 6364 and 87 FR 31636), as outlined in ADECA's 2020 *DR Action Plan*, PIP will include activities that meet the Low-to-Moderate Income national objective.

LMI national objective: Benefiting low- and moderate-income persons.

- Area benefit activities – An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low- and moderate-income persons.
 - Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity.
 - An activity that serves an area that is not primarily residential in character shall not qualify under this criterion.
 - Other exceptions to area benefit determinations may apply as outlined under the Federal Register allocation notices.
- Limited clientele activities – An eligible activity which benefits a limited clientele, at least 51 percent of whom are low- and moderate-income persons.
- LMI housing activities - An eligible activity carried out for the purpose of providing or improving permanent residential structures that, upon completion, will be occupied by LMI households.

5.4.2.3 Eligible Activity

Infrastructure repair and improvements are considered an eligible activity for CDBG, and by extension CDBG-DR funding, in accordance with 42 U.S. Code 5305(a) and Section 105(a) of the Housing and Community Development Act of 1974 (HCDA). The two eligible activities which the PIP intends to utilize are:

- HCDA Section 105(a)(2) – Construction/reconstruction of public facilities and improvements: Authorizes the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.
- HCDA Section 105(a)(4) – Clearance, rehabilitation, reconstruction, and construction of buildings (including Housing): Authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).

The City has outlined potential infrastructure activities under Section 5.4.2.1., with primary activities serving LMI communities, benefitting vulnerable populations, having a storm mitigation and resilience impact, and supporting housing activities under the Affordable Rental Housing Development Program.

When reviewing projects, the City has determined not to fund projects which may be time-prohibitive or cannot meet the primary disaster recovery or resilience needs as outlined under Sections 5.2, 5.4.2.1., and 5.4.2.7.

Examples of ineligible activities include the following:

- Dredging of canals, ditches, or other water passageways;
- Removal of vegetative growth in canals, ditches, or other waterway types;
- Emergency management plans;
- General debris removal;
- Levee and shoreline stabilization, as well as other flood control structure(s) development, which involve complex permitting and otherwise leave little to no time for construction based on ADECA's timely expenditure of CDBG-DR funding;
- Roadway repairs or improvements which do not support housing activities under the Affordable Rental Housing Development Program, do not improve general traffic flow, or do not involve ingress/egress routes during times of evacuations; and
- Drainage improvement projects which do not have substantial, community-wide impact or do not support housing activities under the Affordable Rental Housing Development Program.

5.4.2.4 Eligible Costs

This program provides funding for costs related to the development and implementation of public amenities and facilities, drainage and flood control structure(s) development, and roadway improvement projects. Eligible costs include:

- Project management (including hiring of consultants to comply with CDBG-DR regulations and grant requirements);
- Planning and design fees associated with the construction;
- Demolition and clearance costs;
- Construction management and project inspections;
- Acquisition and permitting fees, as applicable; and
- Construction (labor and materials) costs.

The City may also consider other internal costs as eligible costs under the PIP, such as activity delivery costs within the City and its departments, in accordance ADECA's *2020 DR Action Plan*. Other requirements, such as environmental reviews and approval of incurring these activity delivery costs, may also fall under these costs or project management costs.

5.4.2.5 Eligibility Criteria

All PIP projects must meet an eligible activity (as described under Section 5.4.2.3.) and establish their activity as a disaster recovery effort (have a tie-back to Hurricanes Sally and Zeta), with one exception for potential mitigation only activities which do not require a storm tie-back. The City will meet its 15 percent set-aside for mitigation activities within this program, through projects which have a demonstrable tie-back and through potential mitigation-only projects.

Additionally, as mentioned within Sections 5.4.2.1. and 5.4.2.3., projects under the PIP must demonstrate at least two of the four following primary eligibility criteria:

- The project must serve a predominantly LMI community.
- The project must have a storm mitigation and resilience impact.
- The project must support infrastructure for housing activities conducted under the Affordable Rental Housing Development Program.
- The project must be located in the City's MID Recovery Zones.

The City will recommend projects which can also meet the following minimum criteria:

- Design and construct all newly constructed infrastructure that is assisted with CDBG-DR funds to withstand extreme weather events and the impacts of climate change. This includes incorporating mitigation measures and resilient elements and design as construction standards within the project.
 - In addition to this requirement, construction projects must comply with applicable state, local, and tribal codes, and standards for floodplain management, including elevation, setbacks, and cumulative substantial damage requirements.
- Infrastructure facility and other improvement projects, assisted with CDBG-DR funds, 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 the 100-year (or one percent annual chance) floodplain.

The City will comply with Duplication of Benefits (DOB) requirements and must demonstrate the project's ability to implement and expend CDBG-DR dollars timely and within the program's performance period and milestones.

5.4.2.6 Tieback to the Storm

The City of Mobile's infrastructure activities under the PIP address both the direct and indirect impacts of Hurricanes Sally and Zeta including:

- Identifying where the storms impacted the form or function of the roadway or drainage system (or other developments related to housing) at the time of the storm;
- Addressing the resulting effects of the storms on roadways, sewage and drainage systems, public facilities and amenities, and supporting infrastructure for affordable housing developments;
- Addressing the increased impact that the performance failure of roadways, sewage, drainage, public facilities and amenities, and housing developments had on areas with predominantly LMI communities; and
- **Factor for Mitigation-Only Projects:** Addressing how improvements will positively impact the community during future disasters and reduce levels of damage sustained by the community.

5.4.2.7 Feasibility

LMI Percentage

The City will prioritize and fund projects which meet an LMI national objective; however, American Community Survey (ACS) data indicates that the City's incorporated limits have an overall percentage of 39.13 percent of LMI residents. The City will determine whether projects which indicate the greatest need and impact can make use of smaller, predominantly LMI service areas within the City's limits when undergoing the project selection process. The City will select project locations based on rational service area determinations and conduct LMI Summary Data (LMISD) assessments on projects to not only approve activities serving an LMI area benefit but also consider how non-LMI service areas could provide benefits to LMI individuals and families.

Cost Reasonableness

The City will only approve infrastructure projects that can reasonably support cost feasibility and cost-effectiveness in accordance with federal cost principles as prescribed under the Federal Register allocation notices (87 FR 6364 and 87 FR 31636, respectively) and ADECA's 2020 DR Action Plan. Each infrastructure project under the PIP will need to provide sufficient evidence that the project is cost reasonable, as described under Section 5.2., and operational as a long-term functioning project, with a plan in place for the infrastructure improvements to be maintained and operated by the City (or its partner(s), as applicable) for a set period of time as prescribed within the project's description.

Projects that cannot be reasonably managed and demonstrate all project costs as allowable, reasonable, necessary, and cost-effective by the subrecipient will not be approved by the City for a CDBG-DR award.

Project Compliance and Performance

CDBG-DR projects funded by the City will need to ensure compliance with all cross-cutting and performance (timeline) requirements throughout the project life. This will require the City to review and monitor initial project design and completed actions and determine if it satisfies all federal regulatory and performance requirements.

5.4.2.8 Budget

The City has determined that it will allocate \$20,814,900 towards infrastructure improvements throughout the City. This will require a decrease of \$8,777,123 million from the infrastructure activities budget as outlined in the approved ADECA allocation under Amendment #2 in the *2020 DR Action Plan*. Activity delivery for all infrastructure activities is anticipated to cost between 10 and 15 percent for the activities implemented with this proposed allocation.

Budget Category	Funding Level
Priority Infrastructure Program (PIP) Proposed Program Budget Allocation	\$20,814,900

5.4.2.9 Timeline and Readiness

The City will select projects after an assessment of the overall City-wide recovery needs as described in the sections above. Below is the timeframe by which the City anticipates identifying projects, awarding CDBG-DR funds to selected projects, and expectations on completing and closing out projects.

Program Development Action	Estimated Timeline
Identification of City Projects	Within 60 days of LRP approval
Project Review	Within 90 days of LRP approval
Completion of Interagency Agreements	120 – 150 days of LRP approval
Project Start	Early 2025
Project Completion	Within 6 months of grant close out
Program Closeout	Within 3 months of grant close out

5.4.2.10 Partners

The City anticipates collaborating with certain departments within the City’s administration, as well as other potential City agencies and authorities, when selecting infrastructure activities under the PIP. While the City anticipates implementing all infrastructure activities and does not intend to award funding to partners (subrecipients) for implementation and administration of the program, it may execute interagency agreements or memorandums of understanding with these agencies to ensure adherence to CDBG-DR requirements.

The City may also engage an engineering firm(s) to assist in the assessment and implementation of infrastructure projects.

6 GENERAL REQUIREMENTS

6.1 PUBLIC PARTICIPATION

6.1.1 OUTREACH AND ENGAGEMENT

HUD and ADECA require jurisdictions that receive CDBG-DR funds to complete comprehensive communication and outreach activities to inform Unmet Needs and Mitigation Analyses, help identify impacted groups and areas, and guide program design and implementation. To meet this requirement, the City of Mobile developed and implemented an Outreach and Engagement strategy with the following objectives:

- Identify unmet needs not captured by standard data sources
- Use community outreach and input to fund priorities that reflect the diverse racial, ethnic, and socioeconomic needs of communities
- Conduct outreach to diverse communities for coordinated and transparent decision-making
- Listen to opportunities for programs that promote access for diverse populations
- Provide a solid foundation for conducting future citizen participation processes that can be enhanced over time with new lessons learned

The following sections describe the City's outreach and engagement activities over the course of the recovery planning process.

6.1.2 CONSULTATION

Throughout the development of the Local Recovery Plan, the City consulted with residents, local government entities, community-based organizations, private sector, and other stakeholders who were affected by the 2020 hurricanes. Per LRPP requirements, the City conducted outreach to disaster-impacted areas and communities, invited members of the public to provide feedback and submit public comments on the draft LRP, and integrated stakeholder input into the plan's unmet needs analyses and proposed programs.

The City utilized an extensive stakeholder outreach list, shown in 7.2, to ensure that all disaster-impacted and vulnerable communities were informed and invited to participate.

Using a variety of methods, the City informed and consulted with local stakeholders about the long-term impacts of Hurricanes Sally and Zeta and the goals of the recovery planning process. The planning team created accessible communications materials, including fact sheets, public presentations, and online content to help educate stakeholders about the possibilities and limitations of CDBG-DR-funded activities and potential program types. To reach impacted geographic areas and communities, the City utilized local media, government websites and social platforms, public meetings, a public charrette, informational materials, and facilitated stakeholder discussions.

During the outreach and engagement process, Mobile engaged with fifteen local organizations that advocate for or represent underserved communities, ten local housing providers and fair housing organizations, multiple city departments and municipal utilities, and the local transit authority. Approximately 40 attendees participated in the public engagement process, which included two public meetings and a planning charrette. Represented at these outreach events were City and elected officials, realty groups, community organizations, homeowners, and social service providers. Attendees asked questions and provided input pertaining to local unmet infrastructure needs, including city-wide drainage and stormwater management issues, offered ideas for mitigation measures ranging from cleaning catch basins to better drainage infrastructure, and emphasized the need for more affordable housing units east of I-65, more accessible housing for seniors and workers, and better management and maintenance of affordable units.

The City continued to communicate regularly with the Mobile community during the public comment period and LRP finalization and is committed to ongoing engagement over the duration of program implementation.

6.1.3 PUBLIC HEARINGS

The LRPP requires that participating governments host at least two public meetings and at least one planning charrette in each participating county or municipality.

Prior to the publication of the draft LRP, the City hosted two public meetings and one planning charrette aimed at gathering data and insights to inform the development of the LRP. The public meetings were both held on Thursday, June 13, 2024, at the City of Mobile Government Plaza. The planning charrette was held on July 25, 2024, at the City of Mobile Government Plaza.

These public events included a presentation on disaster impacts, unmet needs, and how recovery dollars might be utilized to support the City's recovery from the 2020 hurricanes and bolster local resilience for future climate impacts. The planning charrette, which focused on affordable rental housing and mitigation activities, also included a questions and answers session and breakout groups focused on potential recovery program and project types.

The City hosted a second public meeting on September 19, 2024, during the 30-day public comment period. This meeting included a presentation on the draft LRP, opportunities for attendees to submit public comments in person, and information about next steps and other ways to submit comments during the review period.

The dates, locations, formats, and number of comments received at each meeting are listed in the following table.

Table 48: City Hosted Public Hearings

Date	Location	Format
6/13/2024 (AM)	City of Mobile – Government Plaza	In Person
6/13/2024 (PM)	City of Mobile – Government Plaza	In Person
7/25/2024	City of Mobile – Government Plaza	In Person Charette
9/19/2024	Ben May Public Library	In Person

6.1.4 PUBLIC COMMENT

The City held a 30-day public comment period between August 14 and September 23, 2024, for the public to review and submit comments on the draft Local Recovery Plan.

The draft was published on the City of Mobile Local Recovery Plan website, along with information about how to submit comments via email, mail, and phone. The City alerted the public about the public comment period through press releases and the City’s website and social media channels.

The City considers all comments received at the public hearings and during the public comment period while developing the final LRP. The final LRP includes a summary of comments received, the City’s response to each comment, and any changes made to the LRP in response to public comments.

6.1.5 COMPLAINTS

The City will adopt the following complaint process:

- City will provide to program participants – in writing – their right to file a grievance against program decisions and their right to appeal a program decision that may disqualify them from participation in a program.
 - Program participants should file their complaint in writing to the appropriate program manager, which will allow the City to track and document complaints received within its system of record.
- The program manager will review the response and determine the appropriate course of action and shall respond in writing within 15 working days of the date of receipt of the complaint. If the claimant is still unsatisfied with the determination of the program manager, he/she may file a complaint in writing to the mayor/chairman of the city commission within 30 days.
- Upon receipt of the complaint, the mayor/chairman shall introduce the complaint in the next council/commission meeting for discussion and appropriate action. A written response shall be forwarded to the claimant within one week of the council/commission meeting. The response shall also direct the claimant to file a complaint with the ADECA if the claimant remains dissatisfied by the council/commission decision.

- The ADECA, upon receipt of the written complaint, will respond in writing within 30 working days and will further inform the claimant to file a written complaint with HUD if still dissatisfied.
- The claimant may then file a complaint with HUD and may seek judicial review if not satisfied by the response from HUD.

Nothing under this procedure shall in any way preclude or limit a person from seeking judicial review of his/her complaint after exhausting all administrative remedies available under this procedure.

Furthermore, any complaints related to acquisition and relocation shall be treated in accordance with the DHUD 1378 Handbook (see Chapters VIII and IX of this manual). As a part of a community's grievance procedure, appealable actions on acquisition and/or relocation matters should be referred to the ADECA for review prior to an oral or written appeal to DHUD, if the individual or business is dissatisfied with the community's ruling. In addition, complaints related to equal opportunity and civil rights shall be forwarded directly to the Fair Housing and Equal Opportunity Division of DHUD, Field Office in Birmingham.

In deciding complaints, the City shall review thoroughly all files and records and consistently apply rules and regulations governing their CDBG-DR program. The City, at its discretion, may obtain any further information by request, investigation or research to insure a fair and full review of the complaint. The City, in making a determination about the complaint, shall inform the claimant about the factual and legal basis for the decision and relief, if any, to which claimant is entitled and how this is to be achieved.

The City shall maintain individual files for all complaints. Contents shall include complete records, correspondence, notices, minutes, references, and other material related to receipt, review, decision and final outcome of a complaint. These files shall be available for review by the State, DHUD, or other Federal officials and shall be introduced as permanent records for any court proceedings.

6.2 AMENDMENTS

The City will also review all proposed contract amendments for CDBG-DR funded projects to ensure that the amendment is in accordance with CDBG-DR program or project objectives. Any amendment that does not meet CDBG-DR objectives will not be eligible for consideration.

Substantial Amendment: A change to this Local Recovery Plan (Plan) is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity, or
- Proposes a reduction in the overall benefit requirements, or
- The allocation or reallocation of greater than 10% of the budget allocation.

When the City of Mobile pursues the substantial amendment process, the amendment will be posted at [HUD Required Documents : City of Mobile](#) for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. The City will review

and respond to all public comments received and submit to ADECA for approval. The City will provide a 30-day comment period prior to submission of all substantial amendments to ADECA. All substantial amendments will be published on the City's website and will afford citizens and interested parties an opportunity to review and comment on the proposed amendment. Any updates or changes to the plan in response to public comments will be clearly identified in the plan. A summary of the public comments received regarding the amendment, and the City's response to each, will be included in the amendment's finalization process.

Non-Substantial Amendment: A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan. An amendment to the plan that does not meet any of the criteria noted in the above Substantial Amendment section will be considered a non-substantial amendment.

The City will notify ADECA five business days before the change is effective. All amendments will be numbered sequentially and posted to the website into one final plan. An amendment to the plan that does not meet any of the criteria noted in the above Substantial Amendment section will be considered a non-substantial amendment.

Non-substantial amendments may be made at the discretion of the City and will not require a public comment period. Notice of a non-substantial amendment will be provided through the City's website. The City may also publish additional public notices and conduct additional hearings (or provide public comment periods) to meet program requirements, if unique circumstances arise (e.g., a natural disaster, pandemic, emergency allocation of funds, or another situation that is not already accounted for). The City will notify ADECA when it makes any amendment to the plan that is not substantial and will publish the amendment on the public website.

6.3 DISPLACEMENT OF PERSONS AND OTHER ENTITIES

If any CDBG-DR programs administered by the City require the displacement of persons or other entities, the City assures that it will follow the requirements stated in the City's Residential Anti Displacement and Relocation Assistance Plan.

6.4 PROTECTION OF PEOPLE AND PROPERTY

6.4.1 FLOOD INSURANCE REQUIREMENTS

Residential properties located within the special flood hazard area (100-year floodplain) that receive CDBG-DR assistance for repairs, improvements, or acquisition shall purchase and maintain flood insurance for the assisted facility in perpetuity. Flood insurance is not required for HUD-assisted leasing of a building or structure provided that the assistance is not used for repairs, improvements, and acquisition.

Non-residential facilities located within the special flood hazard area (100-year floodplain) that receive CDBG-DR assistance for repairs, improvements, or acquisition shall purchase and maintain flood insurance for the assisted facility in perpetuity. Flood insurance is not required for HUD-assisted leasing of a building or structure provided that the assistance is not used for repairs, improvements, and acquisition.

Non-residential facilities that receive CDBG-DR assistance to purchase equipment, inventory, or other items considered “contents” under a flood insurance policy that are stored at a facility located within the special flood hazard area shall also purchase and maintain flood insurance.

6.4.2 CONSTRUCTION STANDARDS

The City will abide by the construction standards set in II.B.2. Construction Standards in 87 FR 6364 for any programs that require construction work. Additionally, the City will ensure that all construction work conducted on any CDBG-DR programs will be in compliance with applicable state and local building codes and meet all applicable Green Building certification standards.

6.4.3 PREPAREDNESS, MITIGATION AND RESILIENCE

Resilience is defined as a community’s ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks. To integrate hazard mitigation and resilience planning with recovery efforts, Mobile will promote sound, sustainable, long-term recovery planning informed by post-disaster evaluation of hazard risk and the creation of resilience performance metrics. The purpose of the mitigation activities outlined in this Recovery Plan is to detail a strategy that reduces risks and vulnerabilities of people in hazard-prone areas through current technology, reduces the potential impact of natural disasters on new and existing properties, infrastructure, and local economies, and promotes education, outreach and research and development programs to improve the knowledge and awareness among the citizens—particularly vulnerable populations and historically underserved communities—and industry about hazards they may face and mitigation alternatives that can reduce vulnerabilities.

In accordance with the Federal Register Notice, Mobile will ensure that the mitigation measures identified in this Recovery Plan will align with existing FEMA hazard mitigation plans or other state, local, or tribal hazard mitigation plans. In addition, mitigation measures will be incorporated when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds.

6.4.4 BROADBAND INFRASTRUCTURE IN HOUSING

Broadband refers to a high speed, always-on connection to the Internet.

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

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

The City will require the review for the feasibility of implementing the requisite broadband infrastructure in the plans and specifications approval process and will perform on-site inspections during construction and post construction to ensure compliance, where applicable.

6.4.5 COST EFFECTIVENESS

As a recipient of federal funds, Mobile is responsible for ensuring that the costs of its disaster recovery activities are allowable, reasonable, necessary, and cost-effective. Mobile will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household under any residential rehabilitation, reconstruction, new construction program, or activity funded by CDBG-DR funds. Those policies and procedures will address criteria for determining when the cost of rehabilitation, reconstruction or new construction is not cost-effective (for example, reconstruction and elevation if the cost of repair exceeds a specified threshold) and address possible alternatives if found not to be cost-effective.

Any exceptions to maximum award limitations are subject to grant fund availability. The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as: The process used to analyze the circumstances under which an exception was necessary, How the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart E—Cost Principles, and Justifying the reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

6.4.6 DUPLICATION OF BENEFITS

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) prohibits federal agencies from providing assistance to any “person, business concern, or other entity” for any loss to which the recipient has already received financial assistance from another source (42 U.S.C. 5155(a)). The City will ensure that each CDBG-DR program or project provides assistance only to the extent that the recipient’s project funding needs have not been met by another source.

Policies and procedures for addressing potential DOB will be incorporated into the design and administration of projects and programs. At a minimum, these procedures will include required actions for:

- Verifying all sources of disaster assistance.
- Determining the amount of the unmet need (for projects or applicant-based programs) before determining or awarding assistance.
- Ensuring beneficiaries enter a signed agreement to repay the assistance if they later receive other disaster assistance for the same purpose.
- Identifying a method to monitor compliance with the terms of the agreement for a reasonable period.
- Identifying the personnel or unit of government responsible for carrying out the DOB review
- The completion and retention of documentation demonstrating the review process in compliance with CDBG-DR record keeping requirements.

6.5 PROGRAM INCOME

The City understands that when implementing certain activities with CDBG-DR funds there is the potential for generating program income. In the event a program generates program income, the City shall develop and adopt specific policies and procedures which will align with any policy requirements ADECA may have in regard to reporting and retaining of any program income earned.

These amounts will be recorded and tracked in the City's accounting system and reported to ADECA on a regular basis. The City will not draw down grant funds until all program income has been expended. Program income will be treated as additional CDBG-DR funds subject to the requirements of the applicable Federal Register Notice and must use it in accordance with ADECA's requirements. If any program income remains at program closeout, the City will return these funds to ADECA to transfer to HUD.

6.6 RESALE OR RECAPTURE

The City of Mobile shall establish resale or recapture requirements for housing programs funded and shall outline those requirements in the program guidelines for the activity. The resale and recapture provisions must clearly describe the terms of the resale and recapture provisions, the specific circumstances under which these provisions will be used, and how the provisions will be enforced (whether by recorded deed restrictions, covenants, or other similar mechanisms). The affordability restrictions, including the affordability period requirements, do not apply to housing units newly constructed or reconstructed for an owner-occupant to replace the owner-occupant's home that was damaged by the disaster. Grantees must establish affordability restrictions on all newly constructed single-family housing (defined as four units or less), to be purchased and occupied by LMI homeowners. The minimum affordability period acceptable for compliance are the HOME requirements at 24 CFR 92.254(a)(4). Resale or recapture is not applicable to the proposed programs below.

6.7 CAPACITY ASSESSMENT

The City has completed a capacity assessment in accordance with LRP and CDBG-DR requirements. Should the City utilize subrecipients in any LRP-funded activities, the City will evaluate the capacity of its subrecipients and provide technical assistance to build their capacity to effectively administer assigned programming.

6.8 FEDERAL REQUIREMENTS

6.8.1 ENVIRONMENTAL REVIEW

All activities funded with CDBG-DR must complete an environmental review and are subject to 24 CFR Part 58 and the provisions of the National Environmental Policy Act of 1969. The City of Mobile will ensure that the applicable environmental reviews and assessments are met and documented before the use or commitment of funds for each activity. The City will be responsible for compliance and performance of environmental reviews. The City will adhere to requirements established in section III.C.5 of Federal Register Notices 87 FR 6364 and 87 FR 31636 titled Obligation and expenditure of funds, which requires completion of environmental requirements before the use or commitment of funds by receiving from HUD an approved Request for Release of Funds and certification (as applicable) or adoption of another Federal Agency's environmental review, approval or permit and receipt of an approved Request for Release of Funds and certification (if applicable) from HUD or ADECA.

6.8.1.1 Avoiding Choice-Limiting Actions

The City of Mobile will comply with the requirements located in 24 CFR 58.22, which details choice limiting activities. The City of Mobile will not engage in or incur costs for any activities that are deemed choice-limiting activities prior to receipt of the AUGF from ADECA.

6.8.2 URA - ACQUISITION AND RELOCATION

The City of Mobile will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this notice. Additionally, the City of Mobile will follow the State of Alabama's Residential Anti - displacement and Relocation Assistance Plan (RARAP), located on Alabama Department of Economic and Community Affairs (ADECA) website at <https://adeca.alabama.gov/cdbg-disaster-recovery/> in connection with any activity assisted with funding under the CDBG-DR program.

6.8.3 LABOR STANDARDS

6.8.3.1 Davis-Bacon

The City of Mobile will comply with regulations governing Davis Bacon and Related Acts (DBRA) located in 29 CFR parts 1 through 5 during the administration of any project that triggers DBRA requirements. Additionally, the City will ensure that any construction contracted on projects funded with CDBG-DR funds will follow all applicable regulations, procedures, and requirements under DBRA.

6.8.3.2 Copeland's Act's Anti-Kickback Provision

The City of Mobile will comply with all requirements located in the Copeland Anti-Kickback Act (40 USC, Chapter 3, Section 276c and 18 USC, Part 1, Chapter 41, Section 874; and 29 CFR Part 3), which requires that workers be paid weekly, that deductions from workers' pay be permissible, and that contractors maintain and submit weekly payrolls. Additionally, the City ensure that it and its contractors will abide by the Copeland Anti-Kickback Act for any projects funded through CDBG-DR funds.

6.8.3.3 Contract Work Hours and Safety Standards Act

The City of Mobile must comply with the Contract Work Hours and Safety Standards Act (CWHSSA) (40 USC, Chapter 5, Sections 326-332; and 29 CFR §4, 5, 6 and 8; 29 CFR §70 to 240) for any construction contract at or exceeds \$100,000 on any CDBG-DR funded projects. The City of Mobile understands that if there are any violations related to overtime compensation (time and one-half pay) for hours they have worked in excess of 40 hours in one week. Violations under this Act carry a liquidated damages penalty (\$32 per day per violation).

6.8.3.4 Force Account Labor

If the City of Mobile is required to use force account labor, it will abide by the requirements located in 40 CFR 35.6500. The City of Mobile assures that any use of forced account labor will not be for the purpose of circumventing DBRA requirements and its regulations and protections of laborers and mechanics. Additionally, the City will consult ADECA prior to the use of forced account labor unless unforeseen circumstances or emergency circumstances occur.

If approval is required, the City will provide sufficient justification to ADECA on any HUD funded projects that require construction. The City will sufficiently document the need and justification for the use of force account labor in compliance with 40 CFR 35.6500.

6.8.4 ELEVATION REQUIREMENTS

All structures, defined at 44 CFR 59.1, designed principally for residential use and located in the one percent annual chance (or 100-year) floodplain, which receive assistance for new construction, reconstruction, rehabilitation of substantial damage, or rehabilitation that results in substantial improvement, as defined at 24 CFR 55.2(b)(10), must be elevated with the lowest floor, including the basement, at least two feet above the one percent annual chance floodplain elevation (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 a successor standard up to at least two feet above base flood elevation.

The City will require its construction contractors or residents to comply with the BFE standard of two feet during construction, reconstruction, or substantial rehabilitation of any residential or non-residential structure in a flood zone or special flood hazard zone on any of its CDBG-DR funded projects.

6.8.5 BUILDING STANDARDS

City of Mobile will require quality inspections and code compliance inspections on emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. All projects will undergo inspection to ensure quality and compliance with building codes. The City of Mobile will coordinate with localities to expedite the inspection and permitting process. The definition of substantial damage is defined in 44 CFR 59.1 and applies to any reconstruction, rehabilitation, addition or other improvement to a structure, the total cost of which equals or exceeds 50 percent of the market value of the structure before the start of construction of the improvement.

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

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

The City of Mobile will ensure that all multi-family housing subsidized with CDBG-DR assistance meet Americans with Disabilities Act and accessibility requirements. By adopting this standard across its programs, the State will help increase the availability of accessible housing to meet the current and future needs of older adults and people living with disabilities. This will increase opportunities for households to age in place and build in increased community resilience for individuals with disabilities.

For infrastructure projects, City of Mobile will adhere to all applicable state and local building codes to assure that the built environment and the systems within are sound, safe and sanitary; building users' health, safety and welfare are protected; and that, through a coordinated program of code compliance, investigation and training, there is consistent application of standards.

6.8.6 SECTION 3

On any CDBG-DR HUD funded project of \$200,000 or more, which triggers Section 3 requirements, awarded through the City of Mobile will comply with the Final Rule of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75 as governed by Section 3 of the Housing and Urban Development Act of 1968 (Section 3), as amended.

6.8.7 MINORITY AND WOMAN-OWNED BUSINESS ENTERPRISES (M/WBE)

As required in 2 CFR 200.321, the City of Mobile will take all necessary steps to assure minority owned businesses and women's business enterprises are used when possible. Those steps include:

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

The City of Mobile will sufficiently document all actions taken to comply with 2 CFR 200.321. Additionally, it will require its contractors to comply with 2 CFR 200.321 requirements and sufficiently document efforts.

6.8.8 CIVIL RIGHTS AND NON-DISCRIMINATION

The City of Mobile is committed to Affirmatively Furthering Fair Housing through its disaster recovery efforts. All City of Mobile programs will comply with all relevant fair housing laws including the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. The City of Mobile will demonstrate compliance with the following requirements contained in the Housing and Community Development Act and will include such requirements as part of all applicable CDBG-DR projects:

- Affirmative steps to promote fair and equal access to housing must be taken, regardless of the type of grant,
- Equal opportunities must be afforded to all persons,
- No person shall be excluded or denied program benefits on the basis of race, color, religion, sex, national origin, age or disability; and
- Minority and female-owned businesses must be informed of grant funded contracts. Affirmative steps must be taken to assure this,
- To the greatest extent feasible, Section 3 residents and business owners should be given preference in employment, training, and contracting.

6.8.9 AMERICANS WITH DISABILITIES ACT

The City of Mobile require all construction activities assisted with federal funds to comply with applicable federal accessibility mandates to ensure that accommodations for persons with disabilities are implemented. For the City, this will include compliance with the federal laws and effectively communicating with disabled individuals by providing auxiliary aids and services, as needed.

All construction activities will comply with applicable federal accessibility mandates to ensure accommodations for persons with disabilities are implemented when necessary to comply with Section 504 of the Fair Housing Act and/or the Americans with Disabilities Act. Program guidelines will further describe accessibility requirements.

6.8.10 CONFLICT OF INTEREST AND CONFIDENTIALITY

The City of Mobile will comply with the conflict of interest requirements as dictated by HUD and Alabama state and local law. The City will consult state law if or when a potential conflict of interest is identified during project activities. If the City encounters a situation that may require an exemption or waiver for conflict of interest, it will reach out ADECA to determine if approval from HUD is required.

7 APPENDIX

7.1 IMPORTANT DEFINITIONS AND TERMS

AMI: Area Median Income

CBDO: Community Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant- Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CP: Participation

DCM: Disaster Case Managers

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting System

FEMA: Federal Emergency Management Agency

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

HMGP: Hazard Mitigation Grant Program

IA: (FEMA) Individual Assistance

LIHTC: Low-Income Housing Tax Credit

LMI: Low and moderate-income

MHU: Manufactured Housing Unit

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of general local government

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

USACE: U.S. Army Corps of Engineers

7.2 STAKEHOLDER OUTREACH LIST

Table 49: Stakeholder Outreach, Names and Organization Type

Organization Name	Type of Organization
Advisory Commission on Disabled	Advocacy Groups, Special Populations
Alabama Disabilities Advocacy Program	Advocacy Groups, Special Populations
Alabama Housing Finance Authority	Housing Providers
Alabama Power	Other Governments
AltaPointe Health (formally Arc)	Social Services Providers
Bank of the Ozarks	Banks and Other Financial Institutions
BBVA Compass	Banks and Other Financial Institutions
Center for Fair Housing	Fair Housing Organizations
Department of Housing and Urban Development- AL Office	Other Governments
Dumas Wesley Community Center	Social Services Providers
Embrace Loans	Banks and Other Financial Institutions
Fuse Project	Philanthropic Community Groups
Habitat for Humanity	Social Services Providers
Hancock Bank	Banks and Other Financial Institutions
Historic District Development Commission	Philanthropic and Community Groups
Home Builders Association of Metropolitan Mobile	Realtors and Property Managers
Housing First, Inc.	Social Services Providers
Independent Living Center of Mobile	Social Services Providers
Legal Services of Alabama	Fair Housing Organizations
Martin Luther King Avenue Redevelopment Corporation	Housing Providers
Mobile Area Association of Realtors (MAAR)	Realtors and Property Managers
Mobile Area Chamber of Commerce	Other Organizations
Mobile Area Water & Sewer System (MAWSS)	Other Governments
Mobile Bay Area Apartment Association (MBAAA)	Realtors and Property Managers
Mobile Development Enterprises	Fair Housing Organizations
Mobile Gas	Other Governments
Mobile Housing Authority	Housing Providers
Mobile Housing Board- Resident Leaders	Fair Housing Organizations
Mobile-Baldwin Continuum of Care	Social Services Providers
Providence Hospital Outreach- Guadalupe Center	Social Services Providers
Purple Heart Homes	Housing Providers
Regions Bank	Banks and Other Financial Institutions
Restore Mobile	Housing Providers
South Alabama Cares of Mobile Alabama	Social Services Providers

Organization Name	Type of Organization
Sybil H. Smith Family Village (Dumas Wesley Community Center)	Social Services Providers
Trustmark Banking and Financial Solutions	Banking and Other Financial Institutions
United Methodist Inner City Mission	Philanthropic and Community Groups
United Way of Southwest Alabama	Philanthropic and Community Groups
USA Center for Healthy Communities	Education Institutions
Volunteers of America Southeast	Advocacy Groups, Special Populations
WAVE- the local transit authority	Other Governments

7.3 SUMMARY AND RESPONSE TO PUBLIC COMMENTS

On August 14, 2024, the City posted the draft Local Recovery Plan on its website (<https://www.cityofmobile.org/departments/neighborhood-development/hud-required-documents/>) and began accepting public comment. Public comments were submitted by email to cdbg-dr@cityofmobile.org or in writing to City of Mobile Neighborhood Development Department. The public comment period ended on September 23, 2024, at 4:00 p.m. The following public comments were received during the period:

1. Public Comment – Received 7/25

We need multi-family affordable units built between Government Blvd. and Airport Blvd. to service need for affordable throughout the City of Mobile.

City of Mobile Response: Thank you for your interest in the CDBG-DR funding for affordable housing development. At this time, the City is providing CDBG-DR funding for affordable housing developments that will have a significant impact, be cost-effective, be project-ready (completed and occupied within approximately 14 months of fund commitment) and leverage additional funding from public and private sources.

The City will prioritize projects in most impacted and distressed (MID) Recovery Zones to centralize recovery and mitigation efforts, directing actions toward reducing future risks, preparing for disasters, and supporting the most vulnerable populations. Much of the suggested area between Government Blvd. and Airport Blvd falls in a Tier 1 MID Recovery Zone.

2. Public Comment – Received 9/16

Thank you for the opportunity to respond to the proposed City of Mobile Local Recovery Plan. We have some concerns about the definition of affordable rents that is listed on (PDF) page 81. As we are reading this, the rents would be the lesser of the High HOME-rents or 30% of the tenant's actual adjusted income.

This could mean the rents would fluctuate based on tenant's income. So if a tenant lost his/her job, his/her rent would have to be adjusted downward. Or if a tenant earning close to the High HOME rent income moved out, and a tenant with a lower income moved in, the rent would be decreased (perhaps to lower than the actual cost) to 30% of the new tenant's adjusted gross income.

This definition also does not account for what the affordable rents will be for tenants with housing vouchers.

We recommend striking “or 30 percent (30%) of the adjusted gross income of the household” from the definition of affordable rents.

City of Mobile Response: The City appreciates your feedback and concerns about the definition of affordable rents and understands the need to increase the availability of affordable housing. The City is working with ADECA to further determine appropriate implementation approaches to the affordable rents standard and aims to ensure the standard can be reasonably implemented by all parties.

3. Public Comment – Received 9/23

Thank you all for the work you’ve been doing on this plan. I think the plan addresses some major unmet needs specifically the housing component. However, I think it would be more beneficial if we could incorporate a couple of changes noted below:

1. Extend the deadline for projects to be completed beyond the February 2026 deadline. It will be difficult to strategically allocate funds to projects that must be completed by that deadline. Can you consider front loading projects so that they are funded by that date rather than be completed by that deadline?
2. Consider single family for rent and for purchase housing as a preference in a scattered as well as a clustered approach.

City of Mobile Response: Your feedback and interest in Mobile’s recovery from Hurricanes Sally and Zeta is appreciated. The proposed completion deadlines for programs and projects are informed by the City’s current closeout and expenditure deadlines, which are set by its agreement with ADECA. To meet the timelines set by the State, the City has proposed aggressive but achievable timelines. We are in regular communication with ADECA about our community’s needs and recovery progress and are actively seeking additional information and flexibility to maximize the benefits to our community provided by these recovery funds.

At this time, the City is prioritizing affordable rental housing, and will continue to work with stakeholders and community members to explore viable pathways and development configurations that recover our housing stock.