Homes and Community Renewal

Office of Resilient Homes and Communities

# State of New York Action Plan Incorporating Amendment 9~~8~~ for Community Development Block Grant- Disaster Recovery

*Utilizing Supplemental CDBG Disaster Recovery Funding from the Allocation, Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees under the Department of Housing and Urban Development Appropriations Act, 2022 (Public Law 117-43) and the Continuing Appropriations Act, 2023 (Public Law 117-180)*

**Pub. L. 117-43: September 30th, 2021**
**FRN-6326-N-01: May 24th, 2022**
**Pub. L. 117-180: September 30th, 2022**
**FRN-6368-N-01: January 18th, 2023**

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**ABSTRACT**

The 2022 State of New York Action Plan for Disaster Recovery (the "Plan") outlines New York's plan for expending Community Development Block Grant-Disaster Recovery (CDBG-DR) funds allocated by the U.S. Department of Housing and Urban Development (HUD). Through this Plan and the activities outlined within, the Office of Resilient Homes and Communities (RHC) strives to assist impacted communities within New York State with recovering from the losses suffered during Hurricane Ida (2021), as well as strengthen and prepare New York's most vulnerable populations and communities for future disasters.

**AMENDMENTS**

**Substantial Amendment 9 Public Comment Period September 17, 2026 to October 17, 2026**

A. **Applicant-based program eligibility:** Updates to clarify that in the event that all LMI applications have been exhausted, non-LMI applications may be considered in consultation with HTFC and in furtherance of the Action Plan. Updates made in Abstract; Unmet Needs Analysis; General Requirements; and Grantee Proposed Use of Funds sections.

B. **Reallocation of Funds:** Edits to reflect the proposed reallocation of around $2.8 million from the Ida Homeowner Recovery and Reimbursement (IHRR) and $13.7 million from the Renters Safe Housing Initiative (RSHI) Programs to the Resilient Investments through Support and Capital (RISC) Program, increasing its budget from around $8.3 million to $24.7 million. Edits also reflect proposed adjustments in how all four Program budgets, as well as general planning funds, are split between the State's two Ida sub-grants to maintain compliance with Mitigation set-aside and to allocate between the two sub-grants (B-21-DF-36-0001 and B-22-DF-36-0001) according to which programs and functions are projected to complete spending sooner. Funds are being adjusted for IHRR based on applicant count and anticipated award amounts. RSHI reallocation is based on current and expected applicant count. Funds are being reallocated to the Resilient Investments through Support and Capital (RISC) program to fund the RISC-Infrastructure component proposed by this APA. Edits to update Program outcome projections for IHRR, RSHI and RISC based on the updated budget. RHC will continue to monitor application rates and actual and anticipated costs and will update Program budgets if needed. Updates made in the Executive Summary, Housing Unmet Need, Program Budget, IHRR, RSHI, Affordable Housing Resiliency Initiative (AHRI) and RISC sections.

C. **IHRR Program income cap:** Edits to limit Program eligibility to households at or below 160% of Area Median Income (AMI). Because of the Overall Benefit requirement to use 70% of grant funds to benefit Low and Moderate Income (LMI) persons, programmatic expenditures serving persons above 80% AMI must be limited to ensure compliance. CDBG-DR funds are considered to be funding of last resort and not intended to make every disaster survivor whole. RHC considers that households above 160% AMI, which are considered high income, are generally more likely to have accessed other sources of

disaster recovery funding and/or absorbed disaster losses without excessive hardship. RHC will prioritize LMI households, followed by applicants above 80% AMI and up to 120% AMI on a first come, first served basis. Applicants above 120% AMI and up to 160% AMI will be served from lowest to highest income until award spending reaches the 70% LMI grant fund ratio for the Program as a whole. Updates made in Fair Housing, Civil Rights Data and Advancing Equity, Design Programs Protecting People and Property from Hardship, and IHRR sections.

D. **Reimbursement of DRRA exception subsidized loans in the IHRR Program:** RHC is requesting HUD approval via this substantial Action Plan Amendment to reimburse costs paid with subsidized loans covered by the Disaster Recovery Reform Act of 2018's (DRRA) statutory exception to the Stafford Act, in accordance with the requirements of the 2019 Duplication of Benefits Federal Register Notice. This exception covers subsidized loans issued before October 6, 2023 in connection to declared disasters between January 1, 2016, and December 31, 2021, which includes Hurricane Ida. RHC is updating its housing unmet need analysis to reflect the remaining total number of housing units with damage, based on IHRR applicant counts after the Program's application deadline. This update also provides the number of eligible households yet to be served who have applied to the IHRR program and identifies how the Program will serve these applicants' remaining unmet needs. Based on estimated household needs and available funding, the Program expects to be able to serve ~~all~~these unmet needs, including the reimbursement of eligible costs paid with subsidized loans, for all eligible applicants. Although these loans are subsidized, repayment of the principal and interest can represent a significant burden for applicants who received them, especially LMI applicants. Updates made in Housing Unmet Need and IHRR sections.

E. **AHRI Eligible Applicants Clarification:** Edit to clarify that nonprofit entities are eligible applicants, in addition to not-for-profits. Nonprofit and not-for-profit have distinct legal definitions, but both were always intended to be eligible applicants for AHRI. Update made in AHRI section.

F. **RISC Infrastructure component:** Edits to reflect the creation of the RISC-Infrastructure component of the RISC Mitigation program. This component funds the installation of mitigation upgrades to public infrastructure, public improvements and community facilities that reduce the risks of community flooding, especially those due to severe rain events similar to Hurricane Ida. The original Ida Action Plan included the RISC program as a public facilities and infrastructure program, before it was changed to a Mitigation Planning program in the first Action Plan Amendment (APA 1) to reflect the most effective use of limited funds. Given the current applicant counts and funding needs in RHC's applicant-based programs, IHRR and RSHI, RHC has identified uncommitted funds that can be targeted to address ongoing, unmet, urgent needs for infrastructure mitigation identified in this Action Plan's Mitigation Needs Assessment. Projects funded through the RISC-Infrastructure component will address the type, scale and locations of disaster-related and other critical mitigation needs identified in this Assessment. Additional edits to clarify that nonprofit entities are eligible applicants, in addition to not-for-profits. Updates made in the RISC section.

G. **Updates to reflect previous APA changes to maximum assistance:** Updates to reflect updated maximum assistance amounts for IHRR (APAs 6 and 7) and RSHI (APA 5) in the Program Budget table. Updates in Grantee Proposed Use of Funds.

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## 1. Executive Summary

The U.S. Department of Housing and Urban Development (HUD) announced that the State of New York will receive $68,228,000 in funding to support long-term recovery efforts following Hurricane Ida (FEMA DR-4615) through the New York State Office of Homes and Community Renewal's Housing Trust Fund Corporation (HTFC) administered by the Office of Resilient Homes and Communities (RHC). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in the disaster-impacted areas of Dutchess, Nassau, Orange, Rockland, Suffolk and Westchester Counties.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated $68,228,000

in CDBG-DR funds to the State of New York in response to Hurricane Ida (FEMA DR-4615), through the publication of the Federal Register, Vol. 87, No.100, May 24, 2022 and Federal Register, Vol. 88, No. 11, January 18, 2023. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2022 (Pub. L. 117-43) approved September 30, 2021 (the Appropriations Act) and the Continuing Appropriations Act, 2023 (Pub. L. 117–180) approved September 30, 2022 (the ‘‘2023 Appropriations Act’’).

References to actions undertaken by “the State” (i.e., “the State will”; “the State’s evaluation of”) throughout this Action Plan, as well as in associated Program documents, refer to the New York State Office of Resilient Homes and Communities (RHC) in its capacity as the administrator of CDBG-DR funds allocated to New York State in response to Hurricane Ida.

**Disaster Specific Overview.** Hurricane Ida made landfall in southeastern Louisiana as a Category 4 and traveled northeastward across a total of ten states before impacting New York on September 1, 2021. The remnants of Hurricane Ida brought record downpours in excess of more than 3 inches of rain per hour with a total measurement of 9.46 inches falling in parts of New York City(1). Rapid flooding surged through the streets, inundating homes and roadways within the span of minutes, and quickly trapping New Yorkers in rising floodwaters. Individuals struggled to find their way home and many abandoned vehicles along submerged roadways, including major highways and arterial connectors throughout the region. Others fought to escape their apartments and homes as water quickly rose inside The National Centers for Environmental Information estimated Hurricane Ida to have caused around $7.5 billion to $9 billion in damage in New York. Most tragically, seventeen (17) New Yorkers lost their lives as a result of the storm(2).

Westchester County was one of the hardest-hit areas in New York and sustained enough damage to be made eligible for FEMA’s Individual Assistance (IA) program. Communities along Westchester County’s border with New York City and facing Long Island Sound up to the border with Connecticut suffered the brunt of the storm’s impacts. The coastal community of Mamaroneck reported flood depths up to fourteen (14) feet as a result of high tide from Long Island Sound overlapping with the rain impacts. Other jurisdictions, including Yonkers, the third largest city in New York, experienced urban flooding in addition to riverine flooding as stormwater and wastewater systems overflowed and backed up into streets, businesses, and homes. The north shore of Nassau County, especially communities near the border with Queens, also experienced significant impacts, similar to those reported in Westchester County. Excess water flooded roadways, overwhelmed stormwater and sewer systems, and destabilized embankments and retaining walls.

In the days that followed, some residents of Westchester County as well as the other Presidentially declared disaster areas had to seek temporary shelter and others completely lost their homes and possessions. Following initial recovery efforts led by federal, State and local government partners including the New York State Division of Homeland Security and

Emergency Services (DSHES) and the Federal Emergency Management Agency (FEMA), lingering damage remains across the region. Several local media sources have documented that residents have not been able to receive sufficient financial assistance to cover storm-related expenses and in some cases are still waiting for repairs to be completed and return to their homes(3). Local government stakeholders and community-based organizations repeatedly emphasized as they engaged with RHC on the development of this Action Plan that the communities sustaining the most damage from Hurricane Ida and experiencing the greatest challenges to complete recovery have high densities of vulnerable populations, including the elderly, individuals with limited English proficiency and low-to moderate income residents. Several studies have found significant correlations between low-income/high minority share areas and lower likelihood of receiving recovery assistance and increased wealth inequality. This Action Plan aims to address equity concerns in disaster recovery as experienced by the communities in the disaster-declared counties by considering hardship throughout the State's evaluation of disaster impact and unmet need.

**Summary.** Federal Register/Vol. 87, No. 100/May 24, 2022, Section II, Use of Funds, states: "The Appropriations Act requires that prior to the obligation of CDBG-DR funds by the Secretary, a grantee shall submit a plan to HUD for approval detailing the use of funds. The plan must include the criteria for eligibility, and how the use of these funds will address long-term recovery and restoration of infrastructure and housing, economic revitalization, and mitigation in the MID areas." The Office of Resilient Homes and Communities (RHC) of the Housing Trust Fund Corporation (HTFC) has been designated as the administering agency for these recovery funds. Therefore, in compliance with these requirements outlined in the Federal Register, RHC has developed this 2022 State Action Plan for Disaster Recovery (the "Plan") to describe how the allocated funding will be administered to address long-term recovery needs from Hurricane Ida in the HUD- and State-identified "most impacted and distressed" (MID) areas in a way that is compliant with all Federal, State, and local regulations.

The programs and funding outlined in this Plan were informed by the findings of the unmet needs assessment and risk assessment, included in this document, along with observations captured from outreach to local community stakeholders. To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, RHC referenced in the mitigation needs assessment the adopted Hazard Mitigation Plans for New York State in addition to the six (6) counties receiving FEMA Individual Assistance (IA) located outside of New York City. RHC also initiated consultation meetings with various County and municipal leaders, public housing authorities and community-based organizations. These meetings have been beneficial in gathering information about the impacts of the storm, including existing challenges to recovery, and helped determine the remaining unmet needs in these local communities, as required by HUD.

As part of the development of the Plan, there are opportunities for communities to review and provide feedback on program design and comment on how RHC will implement the CDBG-DR

funds. RHC will convene public hearings open to residents of the disaster-declared counties, to discuss the Initial CDBG-DR Action Plan draft after it is posted on the website. RHC has drafted this Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments throughout a 30-day review period.

As outlined in the unmet needs assessment, RHC has calculated a total unmet need of $91,029,345 attributable to the remnants of Hurricane Ida. RHC utilized best available data sources to perform the analysis of losses sustained; the available resources in response to housing, infrastructure, and economic revitalization needs; and the demographic characteristics of the area of impact. RHC will allocate at least 80% of the CDBG-DR funding to the HUD-designated MID area of Westchester County; remaining funds will be allocated proportionate to need and Program responses across Dutchess, Nassau, Orange, Rockland and Suffolk counties.

In Action Plan Amendment 1 (APA 1) RHC is updating its unmet and mitigation needs assessments based on additional data analysis and follow up with impacted local jurisdictions and affordable housing providers, as well as local elected officials and a community organization partner regarding the allocation of additional funds made available through PL 117-80 for unmet recovery needs for Hurricane Ida and mitigation needs in storm-impacted areas. Based on these analyses, the State's estimates of unmet need for Ida are increasing from $42.4 million to $58.8 million for housing, and from $815,000 to $5.29 million for infrastructure. Based on the updated analyses and consultation with key stakeholders, APA 1 is allocating the additional funds made available by PL 117-80 to provide an additional $7.51 million to the Ida Homeowner Repair and Reimbursement (IHRR) Program; $6.04 million to the Renters Safe Housing Initiative (RSHI); $4.04 million to the Affordable Housing Resiliency Initiative (AHRI); $8.01 million to the Resilient Investments through Support and Capital (RISC) Program; and $1.35 million to cover Administrative costs. In addition, APA 1 is reallocating $1.29 million in general Planning funds to the RISC program, in alignment with its updated unmet and mitigation needs analyses and this program's updated focus on mitigation planning activities.

In Action Plan Amendment 3 RHC is reallocating $1.99 million in funding from the RISC program to the AHRI program. RISC program funding counts toward HUD's 15% cap on Planning spending, and therefore must be reduced in order to remain under that cap. The funding is moved to AHRI in order to maintain the same total allocation of Mitigation funding at $22,343,632. RHC is also reallocating $22,616 from Planning to the IHRR program. This reduction also contributes to RHC's need to bring total planning spending under 15% of the total grant.

In Action Plan Amendment 9 RHC is reallocating $16,422,534.70 in funding from the IHRR and RSHI programs to the RISC program. The State has projected that this funding will not be required to serve the volume of eligible applicants in IHRR and RSHI. Therefore, it will be moved to RISC and will be used to address infrastructure mitigation needs that impact community flooding.

The table below presents remaining unmet need by category (housing, economic revitalization, and infrastructure) after incorporating other identified funding sources for disaster recovery.

Program allocations - are proportional to unmet need, as discussed in more detail throughout this document. Accordingly, the proposed allocation is largely directed toward housing initiatives. Further, resiliency investments are prioritized over dedicated economic revitalization efforts because of the increased benefit they provide per dollar spent across all sectors of the community.

In addition, per section IV.A.3 of the 5/22/24 Federal Register Notice, RHC may utilize grant funds from its previous PL 113-2 and PL 112-55 CDBG-DR allocations, as well as any future allocations, interchangeably and without limitation for the same activities related to unmet recovery needs from both Ida and these prior or future disasters, where the Most Impacted and Distressed areas for Ida and the prior or future allocations overlap, and when allowed by the HUD approved Action Plans for the prior or future allocations.

**Unmet Need and Proposed Allocation**

| Category | Remaining Unmet Need | % of Unmet Need | Program Allocation Amount | % of Program Allocation |
|---|---|---|---|---|
| Administration | $0.00 | 0.00% | $3,411,400.00 | 5.00% |
| Planning | $0.00 | 0.00% | $1,937,383.00 | 2.83% |
| Housing | $58,831,879.26 | 64.63% | $24,113,050.3~~40,535,585.00~~ | 35.34~~59.41~~% |
| Infrastructure | $5,298,929.00 | 5.82% | $0.00 | 0.00% |
| Economic Revitalization | $26,898,537.00 | 29.55% | $0.00 | 0.00% |
| Public Services | $0.00 | 0.00% | $0.00 | 0.00% |
| Mitigation | $0.00 | 0.00% | $38,766,166.7~~22,343,632.00~~ | ~~32.75~~56.82% |
| **Total** | **$91,029,345.26** | **100.00%** | **$68,228,000.00** | **100.00%** |

Data Source(s): Public Assistance Funded Projects Details - v1 | FEMA.gov; OpenFEMA | FEMA.gov; SBA Disaster Data Sharing MOU and Instructions ; OpenFEMA | FEMA.gov; Individuals and Households Program - Valid Registrations - v1 | FEMA.gov
*Allocation Amount includes project delivery costs and does not include administration and planning costs.

## 2. Unmet Needs Assessment

**Overview.** Hurricane Ida battered New York State with record-breaking rainfall causing widespread flooding throughout New York City, Long Island, and the Mid-Hudson Region. The hurricane made landfall in the United States as a Category 4 storm in Port Fourchon, Louisiana on August 29, 2021. Hurricane Ida approached the northeastern United States as an extratropical storm. East-Northeastward winds brought the eye of the storm just south of Long Island, NY on

September 1, 2021. Sustained winds in the Northeast averaged 25-35 knots, however parts of New York sustained winds up to 68 knots. Local rainfall rates reached near or above 3 inches per hour, with a maximum storm total of 9.64 inches in Staten Island, NY, causing deadly and damaging flash flooding in addition to urban flooding in the New York City metropolitan area. Figure 1 traces the path of Hurricane Ida from its formation south of Jamaica to landfall as a Major Hurricane and finally the dissipation of the storm's remnants in the Gulf of Saint Lawrence off the coast of Canada. The storm's path on September 1, 2021, followed the southern edge of Long Island from west to east as the New York area experienced extreme rainfall in the evening and overnight hours of September 1. Figure 2 highlights the rainfall totals experienced the entire length of the Northeast Corridor from the remnants of Hurricane Ida. Rainfall totals of 7 to 10 inches occurred in a narrow band originating north of Philadelphia and traversing Staten Island, the northeast end of Long Island including the boroughs of Brooklyn and Queens along with parts of the north shore of Nassau County, and the area of Westchester County located just north of New York City between the States of New Jersey and Connecticut.

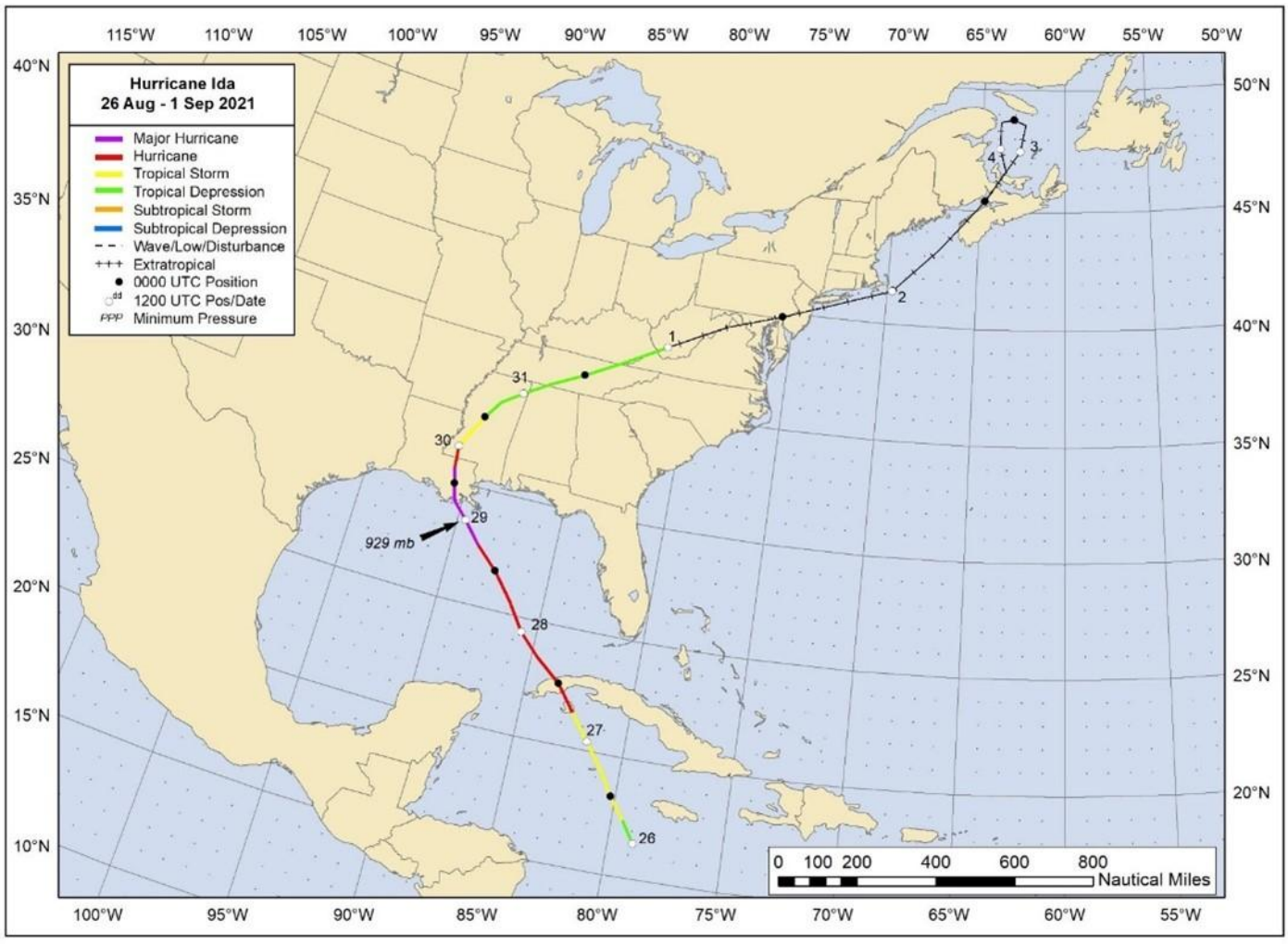


Figure 1: National Weather Service, Hurricane Ida Best track positions 26 August–1 September 2021

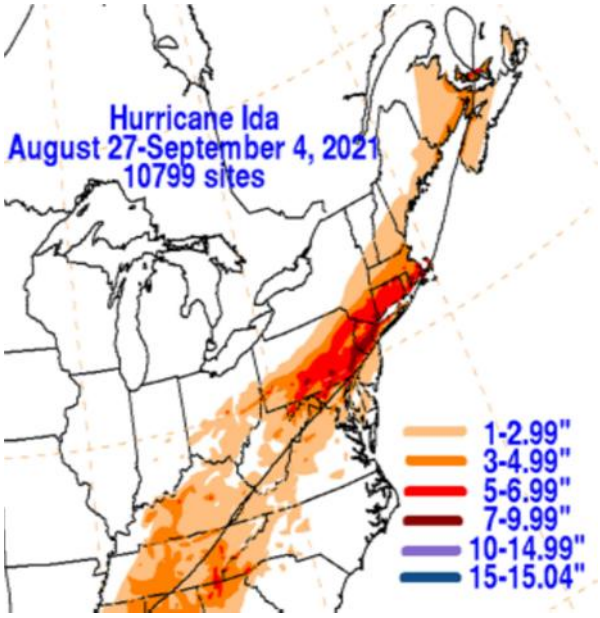


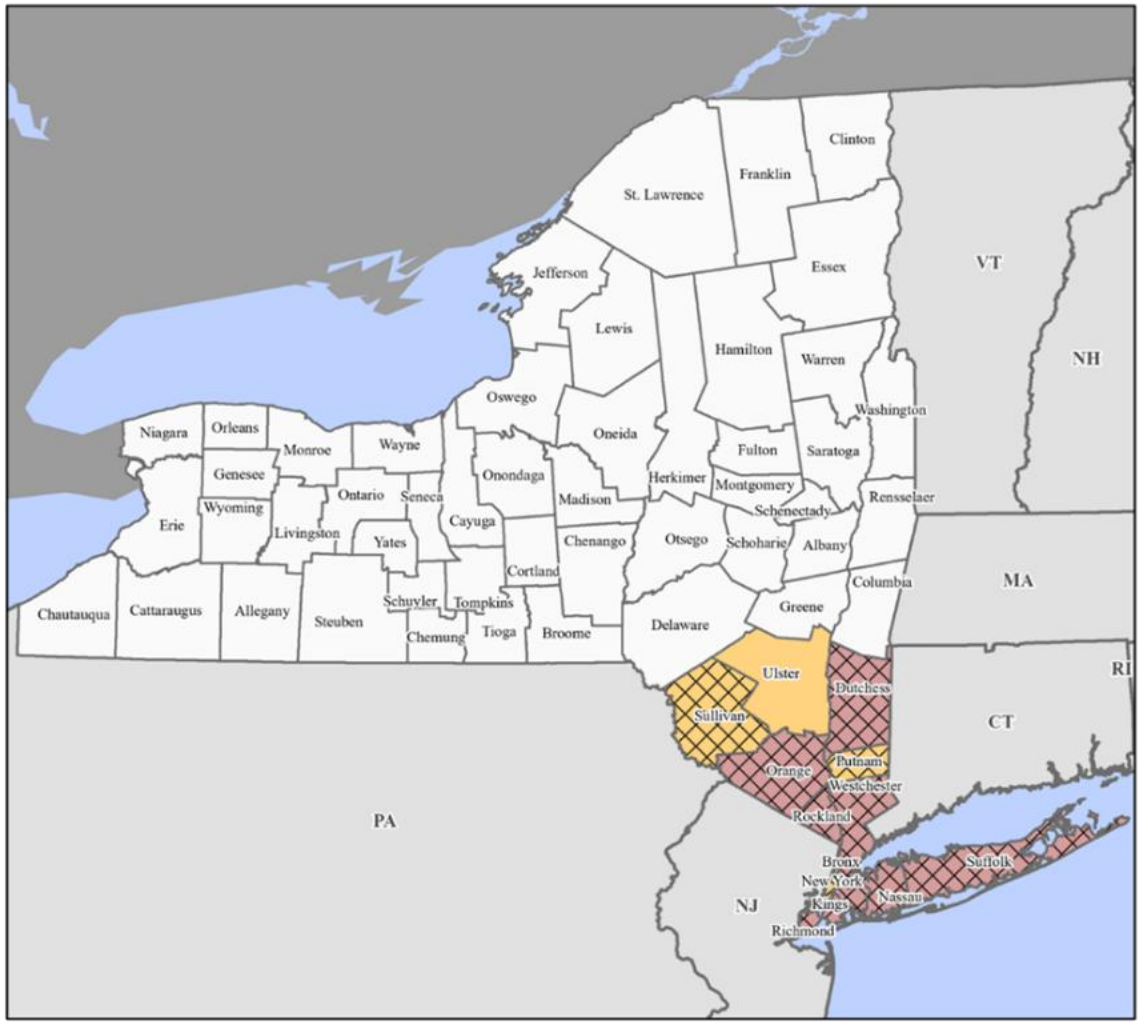
Figure 2: Analysis of storm total rainfall in inches for Hurricane Ida, courtesy of David Roth, NOAA Weather Prediction Center

Hurricane Ida was responsible for a total of fifty-five (55) direct deaths and thirty-two (32) indirect deaths in the United States. In New York, Hurricane Ida caused sixteen (16) direct deaths and one (1) indirect death. Eleven (11) New Yorkers died due to flooding of their apartments or homes, five (5) drowned in cars or were swept away by floodwaters (4). One (1) New Yorker died due to a traffic accident associated with Hurricane Ida's impact. In addition, Hurricane Ida flooded subways, homes, and businesses, causing an estimated $7.5 - $9 billion in damages State-wide(5). Through the Individual Assistance program, FEMA identified flood damage to nearly 12,000 homes and apartments.

All of New York City, Long Island, and the Mid-Hudson Region received Presidential disaster declarations as a result of Hurricane Ida; however, only ten (10) of those counties, and six (6) outside of New York City, received declarations for Individual Assistance (IA) in addition to Public Assistance (PA) (Figure 3). New York City received its own CDBG-DR grant allocation from HUD to address unmet needs within the 5 boroughs (counties) of New York City. GOSR's analysis and resulting programs focus on the remaining counties outside New York City. Within these counties, HUD has identified only Westchester County as being "most impacted and distressed" (MID).

# FEMA-4615-DR, New York Disaster Declaration as of 12/01/2021

FEMA



**Data Layer/Map Description:**
The types of assistance that have been designated for selected areas in the State of New York.

All areas within the State of New York are eligible for assistance under the Hazard Mitigation Grant Program.

**Designated Counties**

- No Designation
- Public Assistance (Category B)
- Individual Assistance and Public Assistance (Categories A - G)
- Public Assistance (Categories A - G)

N
W E
S

0 20 40 60 80 Miles

**Data Sources:**
FEMA, ESRI;
Initial Declaration: 09/05/2021
Disaster Federal Registry Notice:
Amendment #5: 12/01/2021
Datum: North American 1983
Projection: Transverse Mercator

MapID f2b75df4e291202210800hqprod

Figure 3: Presidential Disaster Declaration for FEMA-4615-DR

To assess Hurricane Ida's impact outside New York City, RHC conducted an unmet needs assessment and analyzed the best available State and federal data sources (Table 1), including but not limited to the Federal Emergency Management Agency (FEMA), U.S. Department of Housing and Urban Development (HUD), U.S. Small Business Administration (SBA), and U.S. Census Bureau (Census) to provide informed estimates of unmet needs for housing, infrastructure, and economic revitalization. This analysis identified over $150M in total disaster impacts to counties located outside New York City, including increased costs to bring outdated systems up to current standards and account for recent increases in costs of building supplies including lumber, concrete, and steel(6). While this increase factor is traditionally termed "resiliency" in the established loss estimation methodologies used by HUD to allocate CDBG-DR funds, it is not intended to estimate the costs of intentional resilience projects and community mitigation initiatives needed to reduce the loss of life and property in future disaster events. Where those needs and costs are known and able to be estimated they are discussed throughout this plan and were prioritized in developing RHC'S Program allocations.

Excluding the value of other disaster recovery funds received at the time of the initial Action Plan, the remaining unmet need to be addressed with these CDBG-DR funds is $91M. Overall, the greatest portion of this unmet need is associated with housing at 64.63%; however, as discussed later in this assessment, traditional disaster recovery data sources fail to recognize the full cost of housing loss experienced by renters making this figure an under-representation of the true housing unmet need in the region. Unmet needs related to economic revitalization are 29.55% with infrastructure trailing the other sectors significantly at 5.82% (Table 2/Figure 4). Just as analysis and research indicates the housing unmet need is underestimated by the standard methodology, the economic revitalization unmet need does not anticipate the structural challenges associated with injecting Federal funds into the types of business enterprises that were most impacted. The estimated level of economic need is not supported by local business community interest according to RHC's partners and stakeholders in this recovery.

Table 1: Unmet Needs Assessment Data Sources

| Data | Source |
|---|---|
| Hurricane Ida Impact | National Oceanic and Atmospheric Administration (NOAA), National Weather Service (NWS) |
| Housing Impact | Open Federal Emergency Management Agency (FEMA) - Individual Assistance (IA), |
| Infrastructure Impact | Open Federal Emergency Management Agency (FEMA) - Public Assistance (PA) |
| Economic Impact | Small Business Administration (SBA) - Business Applicant Report |
| Most Impacted and Distressed Counties and Zip Codes | US Housing and Urban Development (HUD), HUD Exchange |
| Presidential Disaster Declaration | Federal Emergency Management Agency (FEMA) |
| Demographics | US Census Bureau, US Housing and Urban Development (HUD), HUD Exchange |
| Social Vulnerability Index | US Census Bureau - American Community Survey 2015-2019, 5-Year Estimates, Vulnerability Map (VMAP) - University of Central Florida |
| Public Housing and Affordable Housing Impact | Local Public Housing Authorities (PHAs) |
| National Climate Assessment | US Global Research Program |
| Hazard Mitigation | NYS Division of Homeland Security and Emergency Services (DHSES), Local County Hazard Mitigation Plans |

Table 2: Estimated Impact, Support and Unmet Needs by Sector.

| Estimated Impact, Support and Unmet Needs | | | | |
|---|---|---|---|---|
| **Summary of Impacts/Support** | **Housing** | **Infrastructure** | **Economy** | **Total** |
| **Amount of Estimated Impact** | $103,389,095 | $ 32,496,196 | $35,110,883 | $ 170,996,174 |
| **Amount of Funds Available** | $60,065,580 ~~0~~ | $30,376,624.38 | $13,748,278 | $104,190,483 |
| **Unmet Needs (Impact - Available Funds) + Resiliency Costs** | $58,831,879 | $5,298,929 | $26,898,537 | $91,029,345 |
| **Percent of Total Unmet Needs** | **64.63%** | **5.82%** | **29.55%** | **100.00%** |

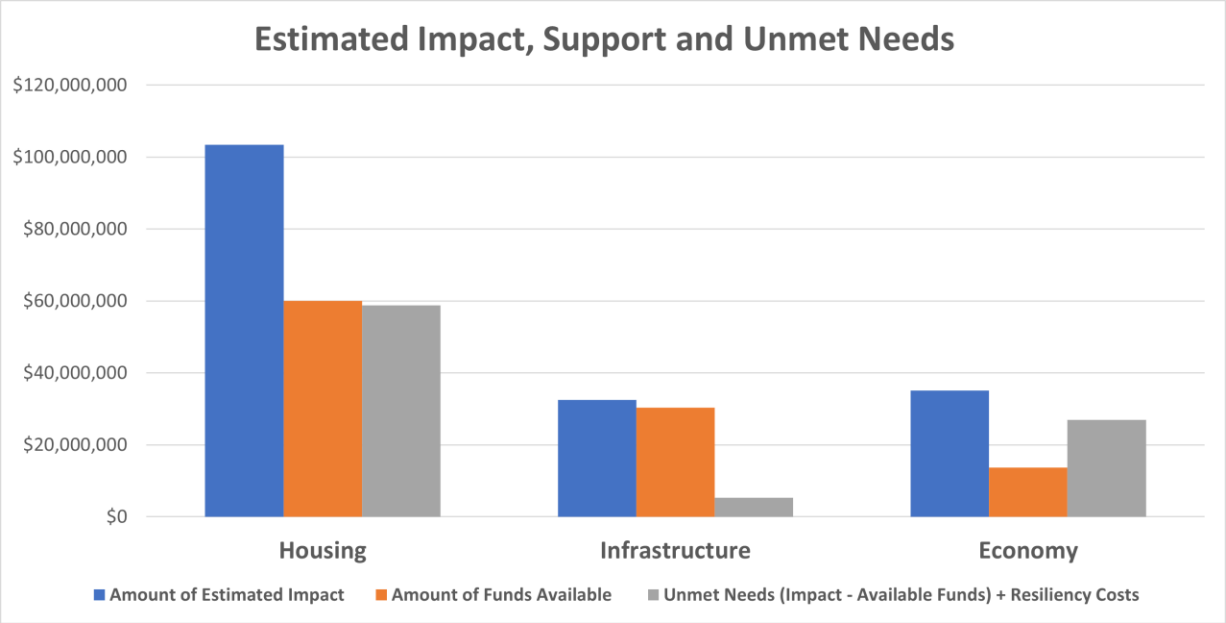



Figure 4: Estimated Hurricane Ida Impacts and Unmet Needs.

### a. Housing Unmet Need

**Disaster Damage and Impacts.** Housing has been a complex issue facing Long Island and the Mid-Hudson Region for decades that has only been exacerbated first by the COVID-19 pandemic and in a more targeted way, by Hurricane Ida. Prior to Hurricane Ida in March 2021, leaders from Dutchess County and Ulster County predicted at a regional Hudson Valley Pattern for Progress meeting that housing would be the biggest challenge to the Mid-Hudson region coming out of the COVID pandemic (7). The challenge as summarized in that meeting is a shortage of availability driving up prices to such a degree that long term the region is not attractive for business investment because people can't afford to live in the community where they work. The pressure in March 2021 was coming from an influx of individuals migrating away from New York City due to the pandemic and remote work capabilities.

However, housing displacement due to the escalating costs of an increasingly unaffordable region was the topic of a report by the Regional Plan Association (RPA) four years earlier in March 2017. That study considered the Hudson Valley, Long Island, and New York City in addition to Northern New Jersey and Southwestern Connecticut and found the percentage of households spending more than thirty percent (30%) of their income on Housing had

significantly increased in each area over the fifteen (15) years between 2000 and 2015. At the time of RPA's report, forty-four percent (44%) of Hudson Valley households and forty-five percent (45%) of Long Island households were spending more than thirty percent (30%) of their income on housing(8). RPA urged municipalities across the region to take strong action to protect economically and socially vulnerable residents, both to address discriminatory policies of the past and to preserve the economic diversity critical to healthy local economies.

More recently, and focused specifically on the HUD-identified MID, the Westchester County Housing Needs Assessment published in 2019 found a significant shortage of housing for extremely low-income renters, people with disabilities, seniors, large families and the homeless. The assessment concluded that over 2,500 households in the County lived in substandard housing and over 4,500 households were severely overcrowded. In total, the assessment estimated Westchester County required nearly 12,000 new affordable housing units to meet existing needs in 2019(9). Hurricane Ida brought but one additional stress on this region already facing a crisis of housing affordability. In assessing unmet needs related to housing, RHC has considered how the larger regional context may influence or distort a traditional calculation of loss and damage impacts. At the same time, there are other avenues and resources for addressing these larger systemic issues, most notably New York State's $25 billion plan to create or preserve more than 100,000 affordable units State-wide being administered by the New York State Office of Homes and Community Renewal (HCR).

Relying on FEMA Individual Assistance (IA) applicant data at the zip code level, loss estimates provided by individual public housing authorities serving the disaster-declared counties outside New York City, and targeted estimates of potential housing unmet need based on flooded residential properties that did not receive FEMA Individual Assistance and renovation needs for storm-impacted below-grade residential units, total housing loss is estimated at nearly $103M. At the time of Initial Action Plan publication, FEMA IA payments to individuals totaled $60M, resulting in a housing unmet need of $58,831,879.26 as of APA 1 including a fifteen percent (15%) factor to address increased costs to bring outdated systems up to current standards and respond to recent inflation and supply chain issues impacting the construction industry(Table 3). With owner-occupied units accounting for over 60% of the estimated housing loss in this updated unmet needs analysis, including approximately $4.4 million in estimated unmet needs for owner-occupied residential units experiencing 1 or more feet of flooding but did not receive FEMA IA in one of the storm-impacted areas, the State is providing an additional $7.51 million to its Ida Homeowner Repair and Reimbursement (IHRR) Program from its PL 117-80 allocation via APA 1. Following completion of the IHRR program's application period, the program's allocation was reduced by $2.8 million in APA 9 to reflect eligible applicant recovery needs.

Table 3: Total Derived Impacts and Unmet Needs for Housing

| Data | Count | Average Real Property Losses | Estimated Total Loss |
|---|---|---|---|
| Minor-Low Damage to FEMA IA Applicants | 3,787 | $1,634 | $6,189,538 |
| Minor-High Damage to FEMA IA Applicants | 1,611 | $3,762 | $6,061,076 |
| Major-Low Damage to FEMA IA Applicants | 4,656 | $4,599 | $21,410,921 |
| Major-High Damage to FEMA IA Applicants | 1,590 | $7,715 | $12,266,180 |
| Severe Damage to FEMA IA Applicants | 780 | $18,829 | $14,686,925 |
| Estimated Additional Damage to Applicants without RPFVL | 14,599 | $1,634 | $23,860,858 |
| Damage to Public Housing | | | $4,877,000 |
| Estimate of 1'+ flooded units that did not receive FEMA IA | 1,449 | | $7,542,000 |
| Estimate of storm-damaged below-grade unit renovation needs | 107 | | $6,494,597 |
| Total Housing Loss | | | **$103,389,095** |
| FEMA payments to repair homes | 10,093 | $5,951 | 60,065,580 |
| Estimated NFIP building payments<br>Public housing funds | | | |
| Total Support | | | **$60,065,580** |
| Initial Unmet Needs | | | **$43,323,515** |
| Total Unmet Housing Need Accounting for an additional 15% in funding needed to support rebuilding to higher standards (resilience) | | | **$58,831,879.26** |

**(1) Single Family v. Multi-Family Needs; Owner Occupied v. Tenant.** Most FEMA IA applicants identified as owners, totaling almost sixty-five percent (65%), while thirty-five percent (35%) identified as renters. Within the population of owner applicants, ninety-three percent (93%) of applicants assessed as having damage received FEMA assistance while just eighty-one percent (81%) of similar renter applicants received assistance.

The combined value of FEMA Verified Loss for owner applicants across the relevant disaster-declared counties totals $62,725,517. These losses are distributed across the six (6) counties as follows:

- Westchester County (MID) – 54%
- Nassau County – 19.4%
- Suffolk County – 13%
- Rockland County – 6%

Dutchess and Orange Counties each accounted for less than five percent (5%) of the total FEMA Verified Loss. Across all six (6) counties, between ninety-two (92%) and ninety-six (96%) of owner applicants assessed as having damage received FEMA IA assistance. (Table 4)

Table 4: FEMA IA Owner-Occupied Units with Verified Loss

| County | # of Applicants | # of Inspections | #Inspected with Damage | #Received Assistance | Total FEMA Verified Loss | Average FEMA Verified Loss |
|---|---|---|---|---|---|---|
| Dutchess | 710 | 600 | 470 | 443 | $1,478,463 | $3,337 |
| Nassau | 3,401 | 2,858 | 1,677 | 1,586 | $8,570,212 | $5,404 |
| Orange | 619 | 524 | 425 | 396 | $1,991,267 | $5,028 |
| Rockland | 1,011 | 838 | 646 | 601 | $3,240,366 | $5,392 |
| Suffolk | 2,239 | 1,859 | 785 | 749 | $3,109,900 | $4,152 |
| Westchester | 9,552 | 8,205 | 6,685 | 6,172 | $44,335,309 | $7,183 |
| **Grand Total** | **17,532** | **14,884** | **10,688** | **9,944** | **$62,725,517** | $6,308 |

The same combined value of FEMA Verified Loss for renter applicants totals just $3,495,468. Only thirteen percent (13%) of FEMA IA renter applicants received assistance. Westchester County, as the HUD-identified MID, accounted for eighty-four percent (84%) of the total FEMA Verified Loss to renter applicants and only Nassau County six percent (6%) of the remaining counties accounted for more than five percent (5%) of the total. (Table 5)

Table 5: FEMA IA Tenant-Occupied Units with Verified Loss

| County | # of Applicants | # of Inspections | #Inspected with Damage | #Received Assistance | Total FEMA Verified Loss | Average FEMA Verified Loss |
|---|---|---|---|---|---|---|
| Dutchess | 157 | 130 | 32 | 28 | $36,971 | $1,320 |
| Nassau | 2,196 | 2,011 | 163 | 120 | $216,105 | $1,801 |
| Orange | 211 | 192 | 35 | 27 | $36,163 | $1,339 |
| Rockland | 345 | 280 | 63 | 55 | $125,376 | $2,280 |
| Suffolk | 2,337 | 2,190 | 82 | 61 | $146,301 | $2,398 |
| Westchester | 4,245 | 3,363 | 1,195 | 984 | $2,934,552 | $2,982 |
| **Grand Total** | **9,491** | **8,166** | **1,570** | **1,275** | **$3,495,468** | **$2,742** |

Examining the FEMA IA applicant data by type of residence, the highest number of applications came from house/duplex and apartment residence types (Table 6). House/duplex is the most common residence at seventy-seven percent (77%) of applicants, with apartments trailing as the second most common residence type at twelve percent (12%). As to be expected, the percentage of owner applicants residing in a house/duplex exceeds the overall share of owner applicants at seventy-five percent (75%) of the house/duplex applications. Nearly ninety-nine (99%) of applications for apartment residence types were from renters.

Table 6: FEMA IA Applications by Housing Type

| Residence Type | # of Applicants | Owner Occupied | % Owner Occupied | Tenant Occupied | % Tenants | Unknown Occupancy Type | % Unknown | % Type |
|---|---|---|---|---|---|---|---|---|
| Apartment | 3361 | 33 | 0.98% | 3313 | 98.57% | 15 | 0.45% | 12.44% |
| Assisted Living Facility | 93 | 2 | 2.15% | 91 | 97.85% | | 0.00% | 0.34% |
| Boat | 16 | 5 | 31.25% | 11 | 68.75% | | 0.00% | 0.06% |
| College Dorm | 45 | 1 | 2.22% | 44 | 97.78% | | 0.00% | 0.17% |
| Condo | 550 | 434 | 78.91% | 112 | 20.36% | 4 | 0.73% | 2.04% |
| Correctional Facility | 4 | 0 | 0.00% | 4 | 100.00% | | 0.00% | 0.01% |
| **House/Duplex** | **20,865** | **15,752** | **75.49%** | **5,029** | **24.10%** | **84** | **0.40%** | **77.21%** |
| Mobile Home | 136 | 90 | 66.18% | 44 | 32.35% | 2 | 1.47% | 0.50% |
| Other | 1187 | 514 | 43.30% | 640 | 53.92% | 33 | 2.78% | 4.39% |
| Townhouse | 544 | 358 | 65.81% | 183 | 33.64% | 3 | 0.55% | 2.01% |
| Travel Trailer | 222 | 201 | 90.54% | 20 | 9.01% | 1 | 0.45% | 0.82% |
| **Grand Total** | **27,023** | **17,390** | 64.35% | **9,491** | 35.12% | **142** | 0.53% | 100.00 % |

Analyzing loss severity by applicant-type confirms again Westchester County as the most impacted and distressed County with eighty-four percent (84%) of the total number of owner applicants and eighty-eight percent (88%) of the total renter applicants being classified as having "Major-High" or "Severe" damage according to the classifications provided in the Federal Register Notice (87 FR 31636) (Table 7/Table 8). Comparing the data for owner applicants having FEMA Verified Loss to renter applicants regardless of category reveals just 6.6% of owner applicants were found to have "Major-High" or "Severe" damage while thirty-nine percent (39%) of renter applicants were found to have incurred losses at these same levels. Said another way, renters were nearly six (6) times as likely as owners to have experienced major losses across all impacted counties, indicating an increased need for resources to help renters recover from Hurricane Ida.

Table 7: FEMA Owner Applicants by Loss Severity

| County | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe | No Damage | Total |
|---|---|---|---|---|---|---|---|
| Dutchess | 277 | 71 | 115 | 4 | 4 | 239 | 710 |
| Nassau | 721 | 289 | 528 | 105 | 61 | 1,697 | 3,401 |
| Orange | 174 | 85 | 146 | 16 | 4 | 194 | 619 |
| Rockland | 258 | 141 | 220 | 25 | 6 | 361 | 1,011 |
| Suffolk | 410 | 143 | 191 | 33 | 11 | 1,451 | 2,239 |
| Westchester | 1,635 | 693 | 2,934 | 958 | 489 | 2,843 | 9,552 |
| **Grand Total** | **3,475** | **1,422** | **4,134** | **1,141** | **575** | **6,785** | **17,532** |

Table 8: FEMA Rental Applicants by Loss Severity

| County | Units with Minor-Low | Units with Minor-High | Units with Major-Low | Units with Major-High | Units with Severe | No Damage | Total |
|---|---|---|---|---|---|---|---|
| Dutchess | 18 | 3 | 9 | 3 | 0 | 124 | 157 |
| Nassau | 50 | 28 | 56 | 24 | 9 | 2,029 | 2,196 |
| Orange | 22 | 5 | 5 | 3 | 1 | 175 | 211 |
| Rockland | 19 | 8 | 25 | 12 | 4 | 277 | 345 |
| Suffolk | 25 | 12 | 27 | 14 | 6 | 2,253 | 2,337 |
| Westchester | 178 | 133 | 400 | 393 | 185 | 2,956 | 4,245 |
| **Grand Total** | **312** | **189** | **522** | **449** | **205** | **7,814** | **9,491** |

Using the zip code information in the OpenFEMA data (10) enables a visual depiction of Ida damage from various perspectives. Total Real Property FEMA Verified Loss, average Real Property FEMA Verified Loss, and number of applicants having Real Property FEMA Verified Loss each provide distinct perspectives on where disaster impacts occurred, as well as their magnitude and intensity.

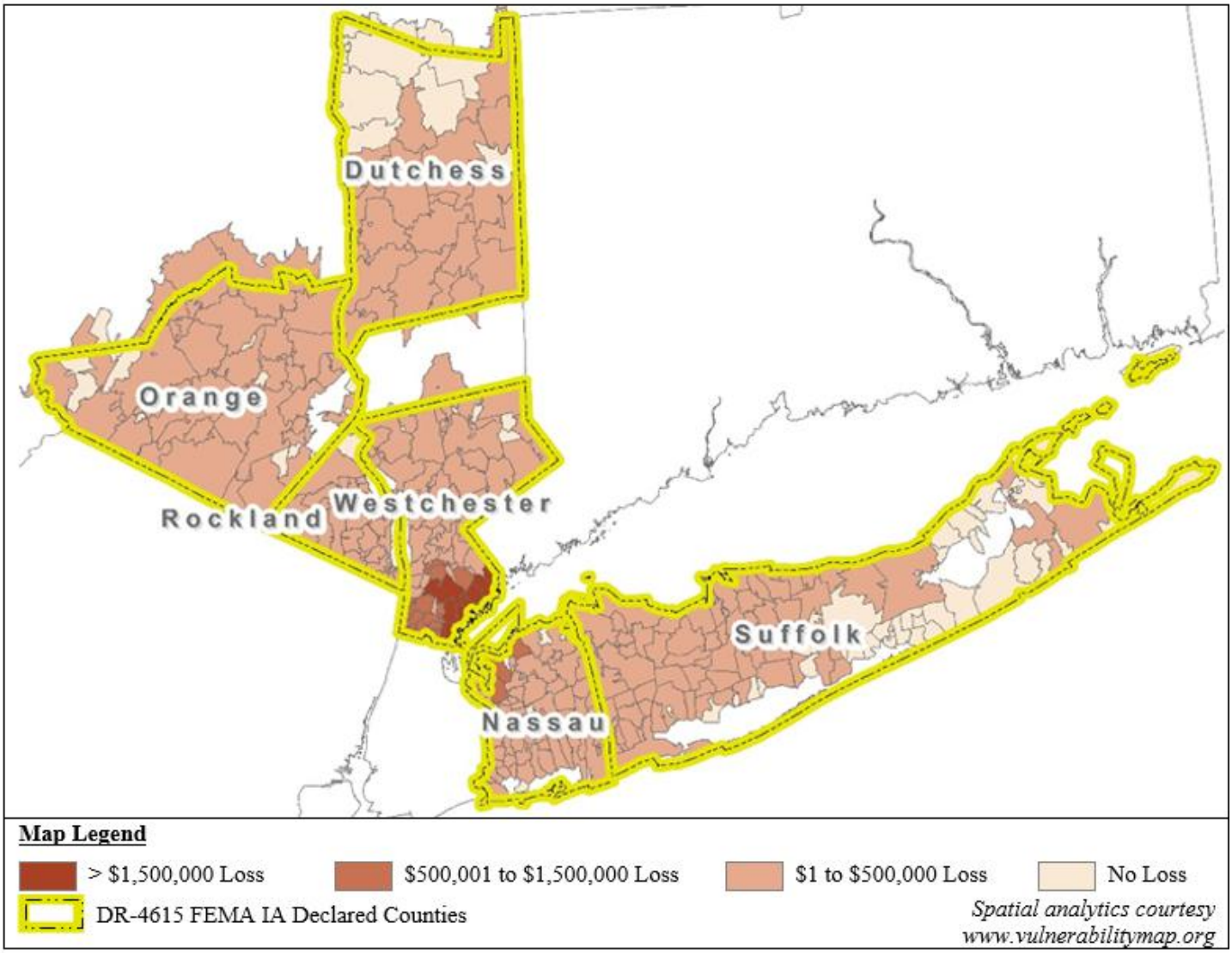



Figure 5: Total Real Property FEMA Verified Loss (RPFVL) By Zip Code

An assessment of total damage indicates that the areas of Westchester County and Nassau County along Long Island Sound and closest to New York City absorbed the brunt of Hurricane Ida's impact. Here, nine (9) zip codes in Westchester each sustained greater than $1,500,000 in Real Property FEMA Verified Losses and an additional thirteen (13) zip codes in Westchester plus four (4) in Nassau County had between $500,000 - $1,500,000 in losses. (Figure 5)

Total losses clearly depict where the greatest amount of damage occurred across the disaster-declared counties but may not provide a complete picture of the impacts in terms of the number of damaged structures and the relative intensity of damage. Mapping Average RPFVL per applicant (Figure 6) can indicate relative levels of damage per dwelling , but can also be distorted by relatively few instances of high dollar losses and places where many residences suffered moderate losses. In contrast, mapping the count of applicants having RPFVL (Figure 7)

can illustrate most-impacted areas in terms of the quantity of residents experiencing losses of any severity.

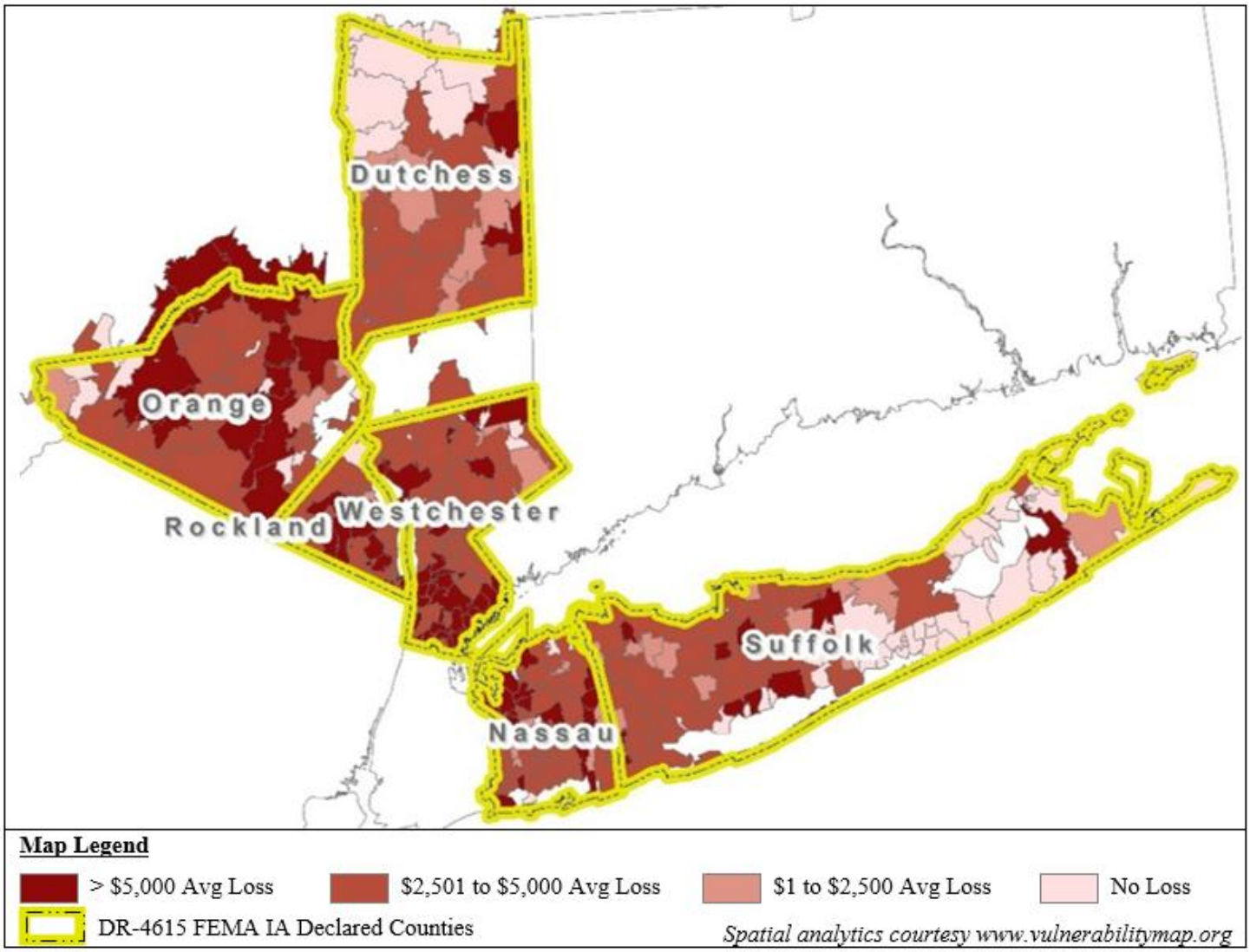



Figure 6: Average Per Applicant Real Property FEMA Verified Loss (RPFVL) By Zip Code

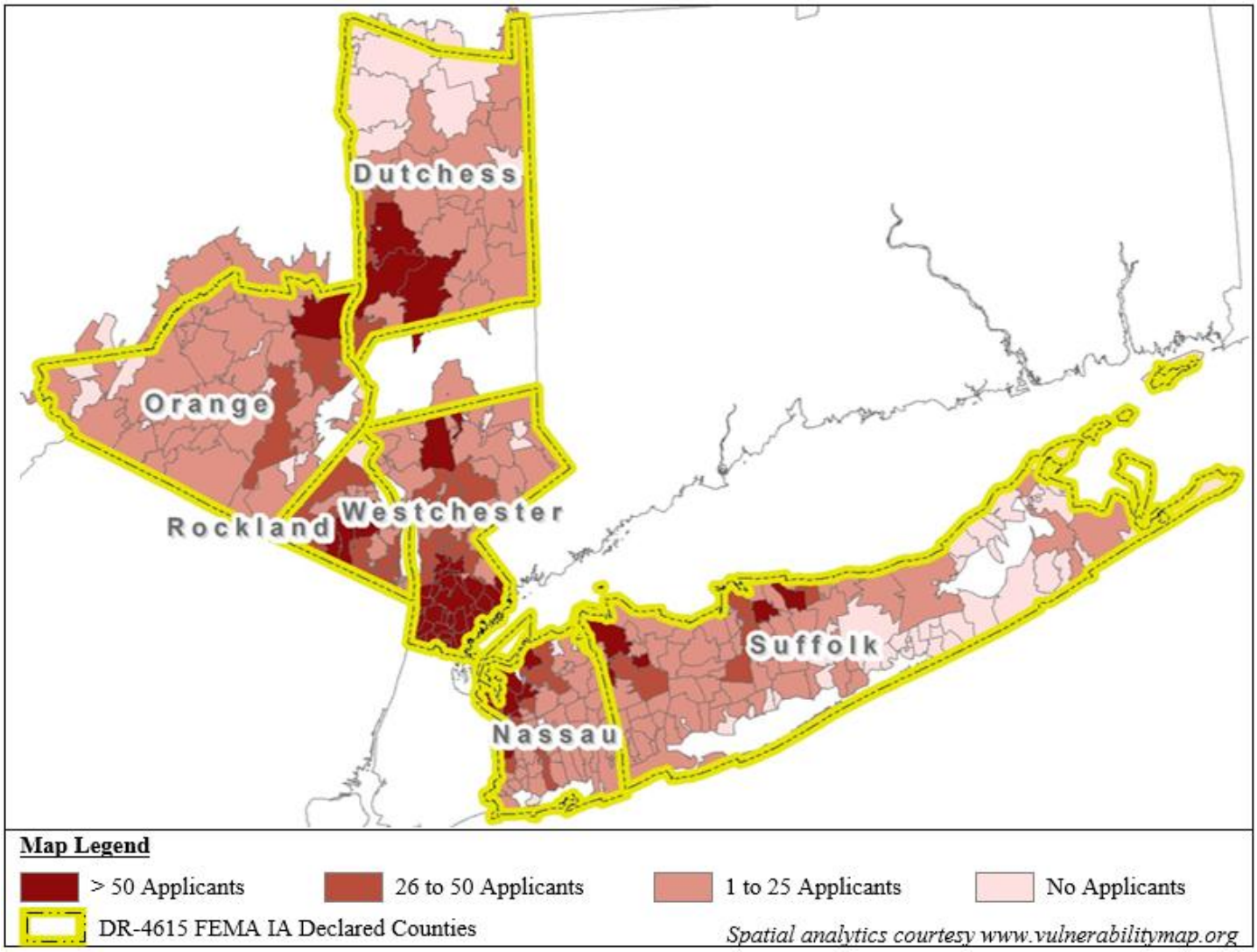



Figure 7: Count of Applicants with Real Property FEMA Verified Loss (RPFVL)

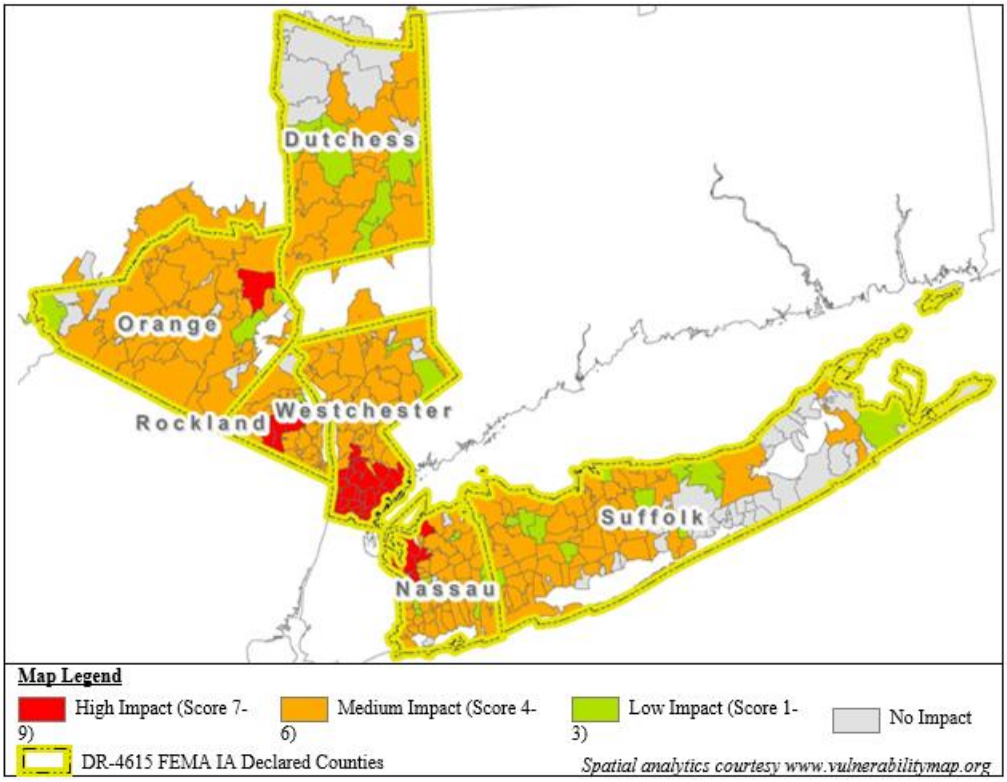



Figure 8: Composite RPFVL Score Aggregating Total Loss, Average Per Applicant Loss, and Count of Applicants with Loss

Combining these three perspectives on Hurricane Ida's impact provides perhaps the clearest representation of "most impacted and distressed" as the areas where more people experienced damage, where that damage was on average more severe, and where there was the most total loss to housing units. Creating a composite RPFVL score ranging from zero (0) to nine (9) indicates southern Westchester County and parts of northern Nassau County as experiencing the most significant overall impacts to housing and individuals (Figure 8).

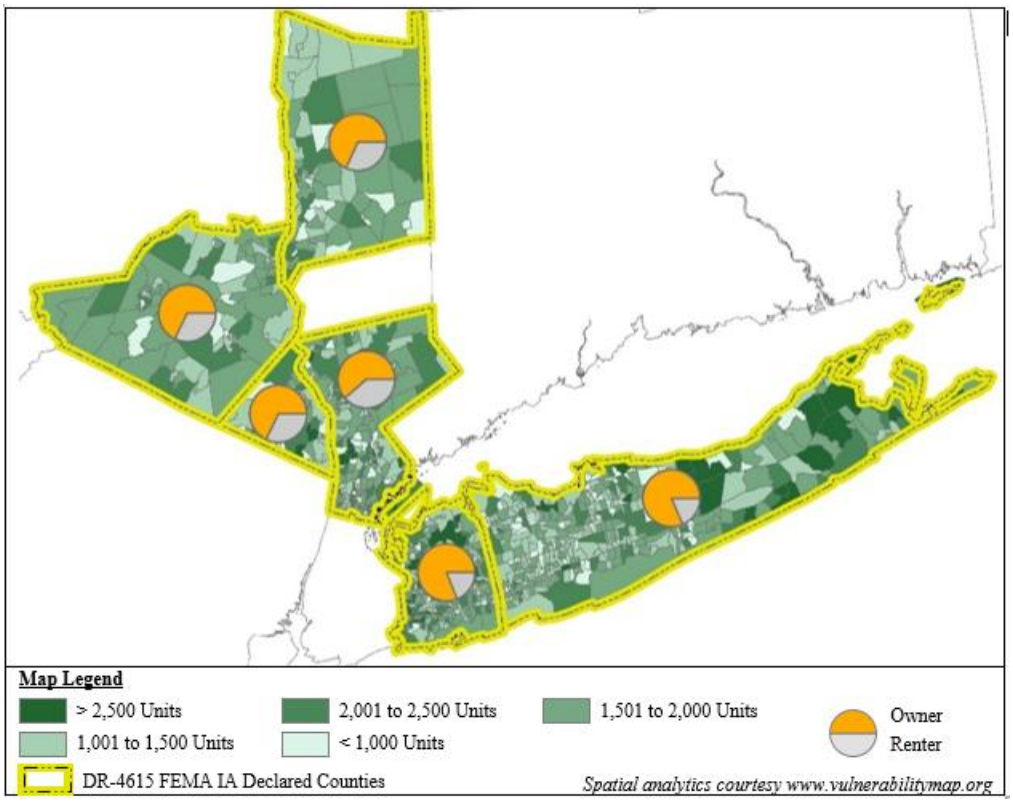



Figure 9: Housing Unit Density Including Relative Percentage of Owner Versus Renter Households

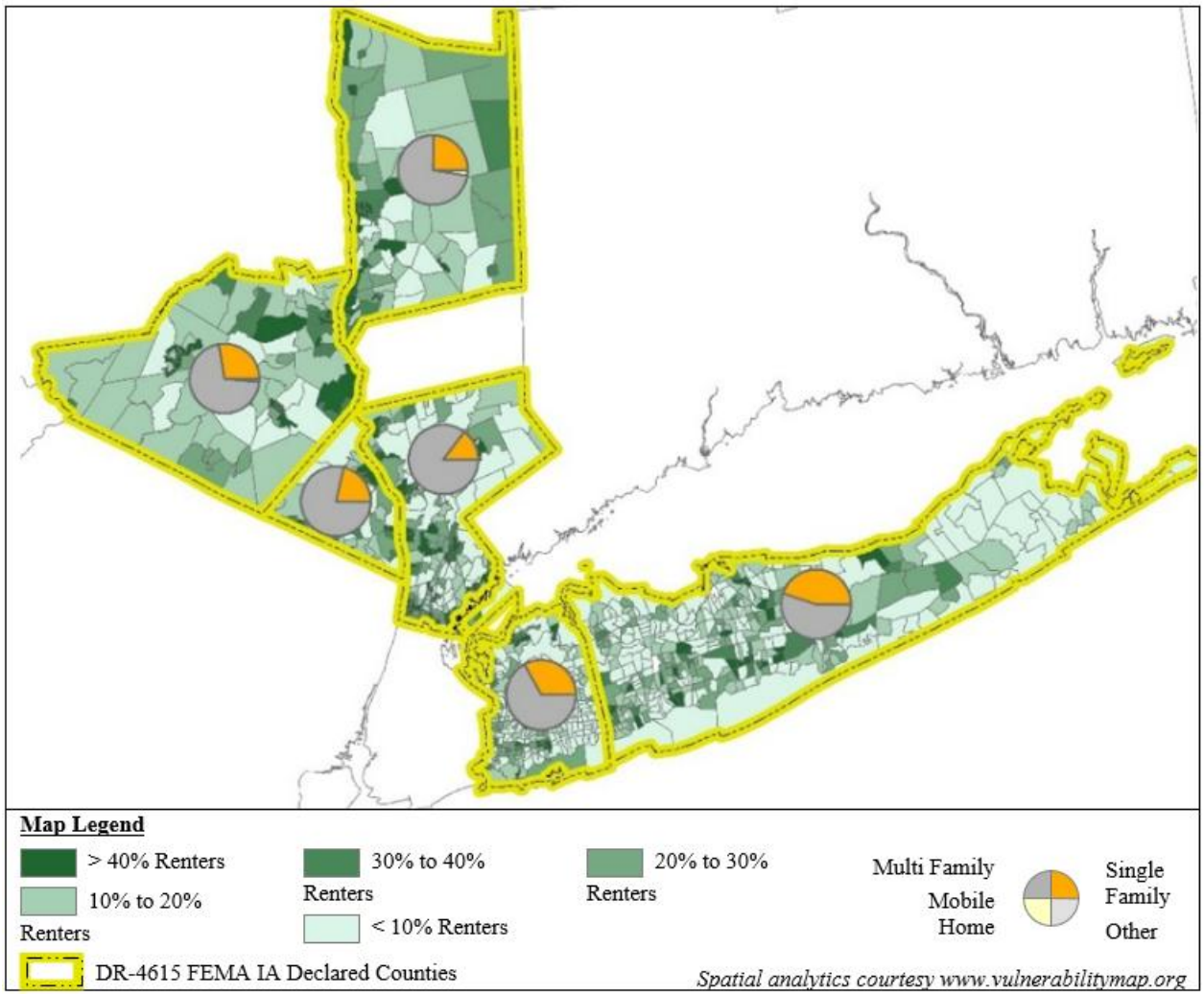



Figure 10: Percentage of Renter Occupied Housing Including Relative Distribution of Structure Type

The areas of lower Westchester County identified in the composite analysis as experiencing the most significant housing losses include the major urban centers of the County, such as Yonkers, New Rochelle, Mount Vernon, and White Plains, that are also characterized as demonstrating higher percentages of renter-occupied units than the average percentage for the County. For example, Mount Vernon is comprised of just thirty-eight percent (38%) owner-occupied units and over sixty-two percent (62%) renter-occupied units, making renter-occupied units a much larger share of housing tenure than Westchester County as a whole which is sixty-one percent (61%) owner-occupied to thirty-nine percent (39%) renter-occupied. Similar trends were also found in Yonkers (54% renter to 46% owner), New Rochelle (49% renter to 51% owner), and White Plains (48% renter to 52% owner).

Figure 9 and Figure 10 use U.S. Census data to depict the distribution of renters versus owners across the disaster-declared counties. Figure 9 shows total housing unit density by census tract in the green gradient overlaid with the relative share of renters versus owners County-wide in the

pie chart. Figure 10 provides the percentage of units occupied by a renter by census tract in the green with the County-level distribution of residential structure types in the pie charts. In both maps, darker green indicates greater concentration, either of occupied housing or share of renters.

Renters generally face a considerable number of additional hurdles during disaster recovery. Disasters disrupting rental housing markets can permanently displace renters, increase rents, affect long-term availability, cause post-disaster displacement particularly for residents relying on housing vouchers, and result in displaced renters being less likely to return to their original places of residence(11). Furthermore, rental housing is often slower to rebuild and recover pre-storm values, making it a less desirable solution from the standpoint of demonstrating rapid recovery outcomes(12). The negative effects to rental housing are often compounded when affordable and public housing are impacted by the disaster. Permanent losses to public- and privately-owned housing stock, opposition to rebuilding linked to racial and class-based stigmas, and perceived blight associated with high vacancy rates can negatively impact rental housing post disaster(13).

Furthermore, renters have been historically underprioritized compared to homeowners in terms of recovery program opportunities(14). Renters are eligible to apply to the FEMA IA program for personal property damage, however they are not eligible for housing damages(15). Landlords are also ineligible to apply for FEMA IA to fund rental unit repairs or replacement. This lack of access to FEMA assistance for housing damages has been shown to lead to longer-term displacement for renters(16). It additionally leads to a lack of data on the full costs of the disaster impacts to renters which can return full circle and lead to fewer program investments targeting renters due to perceived lesser need compared to homeowners.

A 2021 study conducted by Wilson, Tate, and Emrich and published in the open source, peer-reviewed journal Frontiers in Water on barriers to disaster assistance for vulnerable populations indicates social vulnerability is driven by three demographic categories: housing tenure, socioeconomic status, and race and ethnicity(17). Researchers have also found that low-income populations are more likely to be renters(18). Renters are more likely to live in insufficient housing, have less access to hazard information, have less access to financial resources, and are more vulnerable to disasters than homeowners(19). Additionally, damage to rental housing in the wake of disaster decreases the ability of the existing housing stock to support recovery, typically resulting in the need for renters to remain in temporary housing post-disaster(20).

Socially vulnerable renters tend to experience additional difficulties recovering from disasters. As discussed by Fussell and Harris in their 2014 study, renters with negative disaster outcomes also tend to be vulnerable in multiple categories. For example, a disproportionate number of minorities are low-income, renters, or both – necessitating a shift from a single variable perspective of vulnerability – such as income – to a more holistic and place-based assessment. This shift aligns with growing national and international understanding of the need to consider intersectionality when examining social vulnerability to disasters(21). Low-income renters have been historically underprioritized in federal disaster assistance programs and rental repair programs for low-income renters have traditionally had fewer incentives. Further, alternative

sources of rental property owner assistance have largely not kept pace with post-flood demand for affordable housing(22).

Demographic differences likely contribute to slower recoveries for low-income minorities and minority renters. Nationally, the minority share of renters is approximately twice the minority share of owners, and median incomes for Hispanic and Black renting populations are fifteen percent to thirty percent (15-30%) lower than white renters(23). Several studies have found significant correlations between low-income/high minority share areas and lower likelihoods of receiving recovery assistance and increased wealth inequality. Limited access to historical household data on disaster-survivor demographics impedes continued research and analysis of this trend(24).

In an attempt to identify and prepare for a need to serve the renter population of New York State, RHC conducted an analysis to observe flooding from Ida using available data. Individualized FEMA IA data pinpoints flooded units and shares the depth of flooding for each parcel. With this data, RHC has identified 900 additional renter units that were likely to suffer flooding based on their proximity to flooded units of at least 12" identified in FEMA IA data. Moreover, 7 low-moderate income units in Westchester were identified to have potentially suffered flooding of over three feet. While a rough estimate, if nine hundred renter units suffered over a foot of flooding that could be expected to cost at minimum over $3 million (three million dollars) using FEMA's damage category estimates. RHC also completed this analysis to classify owner parcels that could have potentially suffered flooding over a foot and found over five hundred units with an approximate need of over $4 million (four million dollars).

Table 9: Estimated Additional Need for Renters and Owners

| | Total Potential Units Suffering at least 1' Flooding | Minimum FEMA Damage Category | Minimum Amount of Damage Expected | Estimated Additional Need |
|---|---|---|---|---|
| Renters | 900 | Major-Low | $3,500 (personal property) | $3,150,000 |
| Owners | 549 | Major-Low | $8,000 (real property) | $4,392,000 |

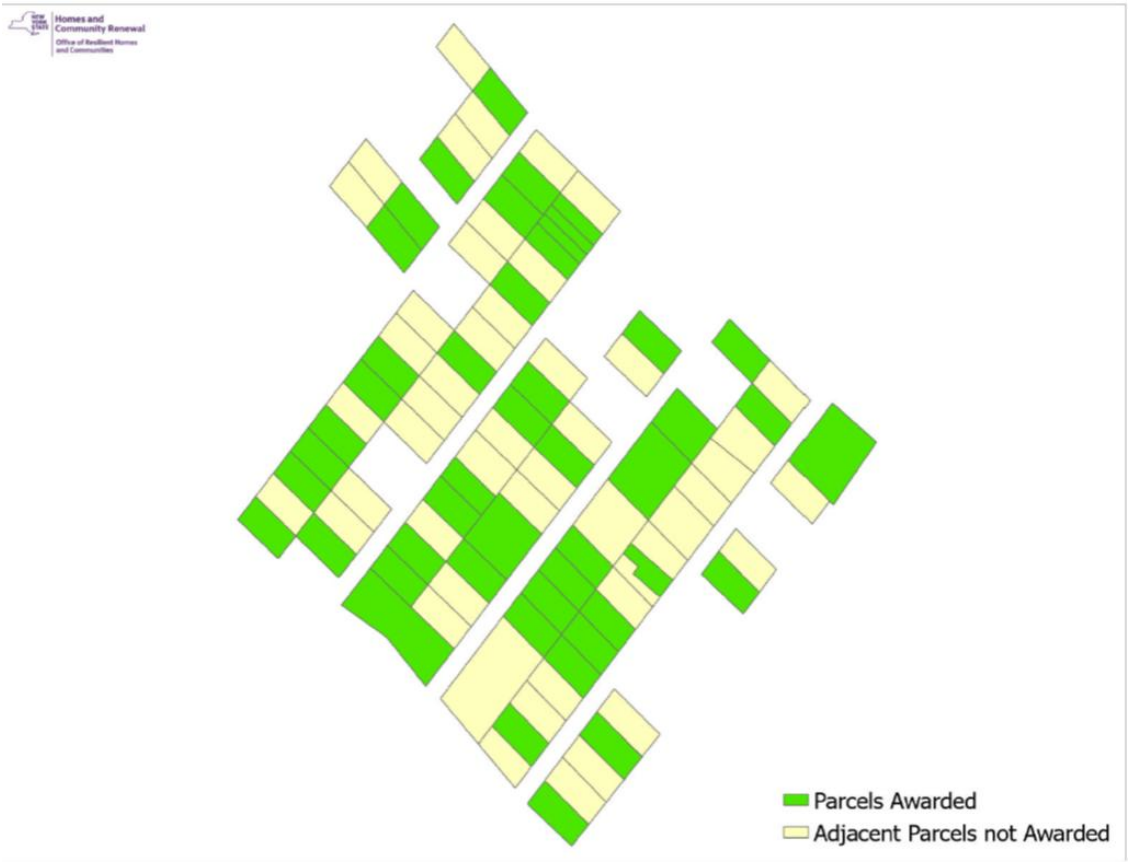



Figure 11: Units in Westchester flooded with at least one foot that did not receive FEMA IA

Figure 11 uses FEMA Individual Assistance (IA) data to show those who were and were not awarded FEMA IA in areas that were inundated. The analysis shows that although some households were awarded assistance, there were households whose homes lay within the inundation zone that were not awarded assistance. Therefore, there is a potential unmet housing need for the homes that were inundated but did not receive FEMA IA awards.

## Addressing Residential-Below Grade Units

The death toll from the remnants of Hurricane Ida reached at least 51 (https://abcnews.go.com/US/idas-remnants-deluge-york-jersey-flooding-rain-tornadoes/story?id=79780365) in the Northeast of the country. Several deaths were in New York, with 13 of them occurring in New York City where many of the flood victims were living in illegal subterranean rental units (26). Such apartments are often the only housing option for low-income populations, but pose a large risk in the event of disaster (https://www.nytimes.com/interactive/2019/10/23/nyregion/basements-queens-immigrants.html). The unfortunate deaths in New York highlight a need for safe housing for low-income individuals across the state.

As part of the outreach efforts, RHC has discussed addressing substandard housing with municipalities in NYS declared counties. In the Most-Impacted and Distressed county of Westchester, the village of Mamaroneck calculated 565 units that are below grade and potentially not up to safety standards. It is not currently known how many of these units are storm impacted, but Mamaroneck is an area with high FEMA IA damage, and it is likely some units sustained damage from Ida. Using public Census and FEMA IA data, Mamaroneck has an estimated total occupied renter population of 2,480 units, where 470 were eligible for FEMA IA payments. The nineteen percent of

the renter population eligible for FEMA payments could apply to the 565 identified below-grade units to estimate that 107 renter units may be storm impacted. Using the estimate that converting a basement to a legitimate rental unit costs $61,000, (28) in New York City, and applying that to Mamaroneck identifies a total estimated cost of $6,424,597 to not only address storm-damage, but also bring the structure to code.

For those units that will not be converted to legitimate units, RHC is concerned about the future risk such units pose to residents. Enforcement of building codes is key to ensuring unsafe units remain decommissioned and do not pose a threat to unsuspecting renters. The village of Mamaroneck estimates that having a full-time staffer working on code enforcement issues with our program would require an annual salary of about $70K per year plus benefits.

Table 10: Total Need- Mamaroneck

| City/ Village | Below-grade Units | Estimated Storm-Impacted Below-grade Units (19%) | Estimated Cost of Renovation | Total Renovations | Cost of Enforcement Officer | Total Need |
|---|---|---|---|---|---|---|
| Mamaroneck | 565 | 107 | $60,000 | $6,424,597 | $70,000 | $6,494,597 |

In addition to the Village of Mamaroneck, other high-damage areas with a significant LMI income include Port Chester, Mount Vernon, New Rochelle and Yonkers. RHC has and will continue to work with these municipalities to identify residential-below-grade units and address safe housing for all residents.

Given all these factors, including the data indicating renter applicants to FEMA following Hurricane Ida that received inspections were far more likely than similar homeowner applicants to have “major-high” or “severe” damage and the relative housing tenure of the most impacted area including several majority renter jurisdictions, targeted analysis of flooded rental units that did not receive FEMA IA awards, and estimated costs to mitigate storm-impacted below-grade rental units it is RHC’s determination that renters represent the majority of the remaining unmet housing need. The estimates for flooded rental units content loss that did not receive FEMA IA awards and storm-impacted below-grade rental units are focused on only a small portion of the disaster impacted areas but help illustrate the potential scale of unmet needs for renters. This analysis identified over 1,000 rental units impacted by the storm. Given the disaster impact and demographic profiles of the renter populations in these areas, analyzed elsewhere in this assessment, many tenants impacted by the storm are likely to have struggled to find and afford new safer housing if forced to relocate, even temporarily, due to Ida’s impact. Additionally, the true value of that remaining unmet need may not be fully captured in the data analyzed due to the barriers experienced by renters to accessing disaster assistance and having their full need assessed. Should additional data become available to quantify the housing losses of renters, RHC may revise this analysis of housing unmet need.

Given this updated unmet needs analysis, RHC is allocating an additional $6.04 million in funds made available under PL 117-80 to its Renters Safe Housing Initiative via APA 1 to address these needs.

RHC provides programmatic definitions of affordable rents, income limits for tenants in CDBG-DR assisted units, and minimum affordability periods, as applicable, in the relevant Programs in the Program Details section of this Action Plan.

**Information for Approval of Reimbursement of Eligible Repair Costs Paid with DRRA-excepted Subsidized Loans**

As required for HUD approval of reimbursement of eligible costs paid with DRRA-excepted subsidized loan, the below table provides updated information, as of APA 9, regarding the estimated number of housing units with remaining damage, as well as the number of eligible households yet to be served who applied to the IHRR program but have yet to be served. The information below is based on applicant counts to the IHRR program following the conclusion of the five month-long application period with robust community outreach, as well as ongoing damage assessments for these applicants. As the table below demonstrates, based on estimated household needs and available funding, the Program expects to be able to serve all homeowner repair and recovery needs, including the reimbursement of eligible costs paid with subsidized loans, for all eligible applicants.

| Category | Number of Households | Award Funding |
|---|---|---|
| Total Program budget for award funds | - | $9,102,000.00 |
| Total Need of all eligible households in the IHRR program (including reimbursement and forward repair) | 78 | $6,638,550.92 |
| Additional reimbursement of repair costs paid with subsidized loans (limited to applicants up to 120% AMI) | 14 | $313,792.04 |
| Remaining Program Funds | - | $2,149,657.04 |

*IHRR Program Information as of August 2026*

**(2) Public Housing and Affordable Housing.** RHC recognizes the impact disasters have on the existing housing stock and the resulting impacts to
the availability of affordable housing(29). The State has received limited data regarding Hurricane Ida's impact on affordable rental housing (including both subsidized and market rate affordable housing), emergency shelters, and permanent housing for persons experiencing homelessness. RHC has initiated the request for additional data in these areas and upon availability will update this Plan accordingly.

RHC has identified impacted governmentally assisted affordable housing as part of our unmet needs assessment. Damage as a result of Hurricane Ida was reported to eight (8) projects across Westchester County that serve 993 affordable units. The nature of damage to these projects included flooding to the basements and parking areas, which impacted mechanicals such as hot water heaters and boilers. These projects have not disclosed benefits received for these damages from any insurance claims.

**Permanent Housing for Persons Experiencing Homelessness:**

In RHC's consultation efforts with community-based organizations in the most impacted areas, RHC engaged with Community Housing Innovations (CHI), whose mission is to provide emergency shelters, transitional and supportive housing, and permanent affordable housing, to name a few. CHI described how a three-unit property located in Mamaroneck, which provided permanent housing for persons experiencing homelessness, was destroyed by the high tide rising from the clogged creek. Water flooded the first-floor unit up to the ceiling causing electrical and heating impacts to the additional two units. Due to the repetitive flooding caused to this building from past events, CHI elected to sell the three-unit structure, forcing two of the families back into the shelter system and displacing the other family outside of the community.

**Public Housing Authorities:**

RHC has performed outreach and consulted with public housing authorities in Westchester County (HUD-identified MID) including those in Tuckahoe, Peekskill, Greenburgh, Tarrytown, New Rochelle, White Plains, Yonkers, and Port Chester and has summarized the information received below. RHC will update this information in the event it receives more information that would necessitate a change in program scope or design.

Throughout the consultation with public housing authorities, it has been repeatedly disclosed that the current options available to PHAs to fund aging building stock maintenance and upkeep, PHAs are converting ownership of these properties to privately held investments. However, for the most part, the properties have remained under the management of the respective PHA. For this reason, the reported damages to these properties, while officially privately-owned, has been included as public housing authority damages.

***Greenburgh Housing Authority:*** The Greenburgh Housing Authority oversees ten (10) different sites, housing 258 families, some of which are under the State housing authority program, the others under not-for-profit models. Six (6) of their properties are currently being transitioned out of traditional public housing via the LIHTC program, three (3) of which have been completed and three (3) of which are currently being renovated.

One of their not-for-profit properties, previously public housing yet managed by Greenburgh Housing Authority, that houses eight (8) low-income senior families in one-bedroom units was inundated with water during Hurricane Ida. All apartments on the first floor, in addition to the basements, were flooded with water and sewage. The flooring and insulation had to be completely ripped out and replaced. Resident’s vehicles were under water, preventing them from being able to leave the property. The housing authority had to temporarily house the four (4)

impacted senior families in extended stay hotels for two (2) months while the repairs were being completed, at rates of $150-$200 per night, in addition to paying for four (4) storage pods to store the residents' belongings. The housing authority also worked with local agencies to gather food and clothing for these residents as their belongings were soaked with raw sewage.

The housing authority's insurance did cover some of these costs, but not all, and they received no other sources of assistance. RHC is pending additional detail from Greenburgh Housing Authority to estimate the dollar value of unmet need.

***Municipal Housing Authority for the City of Yonkers:*** The Yonkers Municipal Housing Authority, fourth largest in the State, experienced damage to three (3) of their eighteen (18) sites, totaling over 800 units and housing 2,000 low- and moderate-income households. The damaged sites were all located in southwest Yonkers and include Loehr Court, Walsh Homes, and Palisades Tower.

Of the three sites which experienced damage due to Hurricane Ida, Loehr Court was hit the hardest. The three buildings which make up the Loehr Court site are located in a low point of southwest Yonkers where the City's water and sewer lines meet. The biggest impact to the site was due to flooding (including raw sewage) of the basements where the mechanical system, electrical switch gear, boilers, hot water heaters, laundry rooms, and community rooms are located. Water and sewage reached the ceiling of the basements and completely damaged the electrical switch gear, wiring, boilers, and hot water heaters.

Loehr Court includes sixty (60) units and is home to families/seniors, including individuals with disabilities which require electricity for oxygen and dialysis. The buildings had recently been renovated under a tax credit program. The Housing Authority staff estimates the cost of installing temporary systems was over $380,000, with the cost to replace and install new heating, hot water and electrical systems with finishes and materials in destroyed common areas at a projected cost of $482,000. The housing authority is still waiting for the insurance estimate to be completed and paid out of pocket for all the storm damage repairs.

The housing authority also noted damaged to Palisades Towers, eight high-rise buildings including 853 units with an estimated cost for evacuating housing residents, clean up and repairs at over $250,000. In addition, the housing authority has identified a need to repair and waterproof the masonry façade at the ground and subgrade levels to direct runoff into the City stormwater system through a new drainage system and underground piping. The estimated cost for this project is anticipated to be a total of $3,000,000, costing an approximate $375,000 for each building.

Lastly, the central heating plant in a building located at Walsh Homes, a senior housing development of 299 senior and disabled apartments, was damaged due to the flooding. The cost of immediate repairs undertaken to restore systems was an estimated cost of $25,000.

***New Rochelle Municipal Housing Authority:*** New Rochelle Housing Authority's Executive Director expressed deep concern about one of their former properties, Heritage Homes, formerly

Harley Houses, which underwent an LIHTC conversion. The 130 units in Heritage Homes houses primarily low-income Black and African American families.

Although no longer directly managed by the housing authority, the housing authority stepped in to assist these families after Hurricane Ida to get breakfast, lunch, and dinner provided by a local restaurant to make sure the families had food, as the property had lost power and families could no longer use their gas and hot water. RHC is obtaining the contact information of this private management company and upon obtaining additional data related to damage, will revise the Multi-Family Assisted Housing Table if needed.

As for the housing authority's own properties, they have expressed the loss of power several times throughout the summer, and how mitigation activities to reduce the reoccurring loss of power would be beneficial for its residents.

***Tarrytown Housing Authority:*** No damage to their properties from Hurricane Ida. However, some of their properties experienced damage during Hurricane Sandy and could benefit from resiliency and mitigation measures to help prevent future damages. The housing authority, in partnership with an architecture and engineering firm, conducted an environmental impact assessment which found that elevating their 151 garden-style apartments would be instrumental in helping prevent future flooding.

***Tuckahoe Housing Authority:*** The housing authority reported eleven (11) feet of water in their basement, as a result of flooding from Hurricane Ida. The damage sustained by eight (8) of their buildings, which house ninety-nine (99) families, included laundry room equipment, heating equipment, electrical panels, and switches. To avoid mold, repairs included opening up the walls and repairing the walls to the entire basement, which included the building's community room. The cost of damage totaled $730,000, which was paid out from the housing authority's reserves, depleting their account by half. The housing authority submitted an application for federal disaster recovery assistance but has yet to receive any funding.

***Port Chester Housing Authority:*** The housing authority reported they experienced flooding throughout their properties. This caused damages to the elevators, basement, lobby, boilers, a housing authority vehicle, and widespread water damage. The total cost of damage estimated at $10,000.

***Peekskill Housing Authority:*** No damages from Hurricane Ida.

***White Plains Housing Authority:*** No damages from Hurricane Ida.

In addition to conducting outreach to public housing authorities in Westchester County, RHC has also performed outreach to public housing authorities in Nassau County.

• City of Glen Cove Community Development Agency
• Village of Great Neck Housing Authority: Confirmed they did not experience damage from Hurricane Ida
• Town of Oyster Bay Housing Authority: Confirmed they did not experience damage from

Hurricane Ida
• North Hempstead Housing Authority
• Town of Hempstead Housing Authority

To address the identified unmet needs for Public Housing and Affordable Housing discussed in this section, RHC is creating the Affordable Housing Resiliency Initiative, described in the Program Details section of this Action Plan, to increase the resiliency and protect the inhabitants of these types of housing stock. As of APA 1, RHC is expecting additional information from State partners regarding additional unfunded and reimbursable repair needs stemming from Hurricane Ida for affordable and public housing stock in the disaster-impacted area. Recognizing that simple repairs of disaster damage will not prevent similar impacts in the future, the critical role of affordable and public housing in addressing housing needs for Low and Moderate Income and ~~other~~ vulnerable communities in light of high housing costs in the area discussed above, and feedback from Affordable and Public housing providers in the area, RHC is allocating an additional $4.04 million in funds made available under PL 117-80 to the AHRI via APA 1.

**Public Housing Authorities Damaged**

| County/Municipality | Total # PHAs | Total PHAs Damaged | # of Units Damaged | Remaining Unmet Need |
|---|---|---|---|---|
| Nassau County | 5.00 | 0.00 | 0.00 | $0.00 |
| Westchester County | 8.00 | 4.00 | 1,319.00 | $4,877,000.00 |
| **Total** | **13.00** | **4.00** | **1,319.00** | **$4,877,000.00** |

Data Source(s): External Interviews

**Fair Housing, Civil Rights Data and Advancing Equity.** As discussed earlier in the analysis of owner-occupied versus tenant-occupied housing needs, vulnerability – especially as it relates to equity in accessing disaster assistance – crosses multiple sectors, income levels, and protected classes and invites a holistic and intersectional examination. RHC has examined each of the following individually for trends across the disaster-declared counties:

• Racial and ethnic make-up of population;
• Limited English proficiency populations;
• Number or percentage of persons with disabilities;
• Number or percentage of persons belonging to other protected classes, including locally defined protected classes;

• Racially and ethnically concentrated areas and concentrated areas of poverty; and
• Historically distressed and underserved communities.

However, it is the areas where multiple vulnerabilities overlap and coincide with areas of significant storm impact that have received the greatest attention in RHC's citizen participation and program design efforts.

Demographically, New York State is nearly seventy percent (70%) white or Caucasian, with individuals identifying as Black or African American alone representing the largest racial minority group at eighteen percent (18%) followed by Asians at nine percent (9%). Hispanics or Latinos of any race, while not included in the Grantee Demographics table following this section, represent nearly twenty percent (20%) of the State's total population with Hispanics or Latinos identifying as white being fourteen percent (14%). The disaster-declared counties account for roughly one-fifth of the total State population and appear significantly less racially diverse than the State overall being nearly eighty percent (80%) white or Caucasian. However, that racial designation includes Hispanics and Latinos identifying as white, which are more than twenty percent (20%) of the population across the six (6) counties. In contrast, the disaster-declared counties are only eleven percent (11%) Black or African American, inclusive of those identifying as Hispanic or Latino.

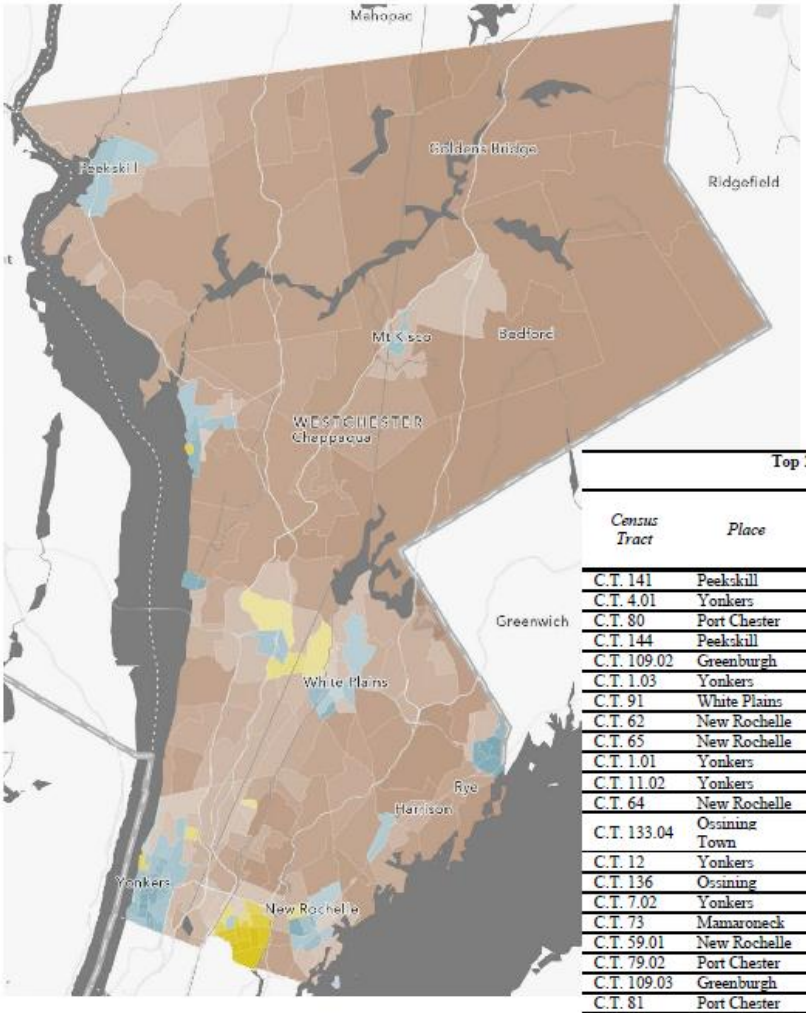
The major races and ethnicities are summarized by county in Table 9. Westchester County, the HUD-identified MID is the closest of the six (6) counties to being majority minority and also represents a quarter of the total population of the disaster-declared counties. Westchester County is one quarter Hispanic or Latino regardless of race, the largest percentage by more than five (5) points among the disaster-declared counties. Westchester County is also nearly 40% Hispanic and Black/African American, exceeding the concentration of the other counties by more than ten (10) points.

Table 11: Race and Ethnicity of the Disaster-Declared Counties

| | **Westchester County** | | **Nassau County** | | **Suffolk County** | | **Rockland County** | | **Orange County** | | **Dutchess County** | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| *Race/Ethnicity* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* |
| Total Population | 968,738 | | 1,355,683 | | 1,481,364 | | 325,213 | | 382,077 | | 293,524 | |
| White alone | 510,754 | 53 | 799,547 | 59 | 991,862 | 67 | 204,650 | 63 | 241,184 | 63 | 207,050 | 71 |
| Hispanic or Latino | 241,442 | 25 | 230,740 | 17 | 290,261 | 20 | 58,036 | 18 | 80,256 | 21 | 36,957 | 13 |
| Black or African American alone | 130,047 | 13 | 150,627 | 11 | 105,591 | 7 | 36,313 | 11 | 38,454 | 10 | 29,153 | 10 |
| American Indian/ Alaska Native alone | 1,527 | 0 | 1,353 | 0 | 2,409 | 0 | 345 | 0 | 621 | 0 | 406 | 0 |
| Asian alone | 58,651 | 6 | 138,755 | 10 | 59,874 | 4 | 19,376 | 6 | 10,757 | 3 | 9,955 | 3 |
| Native Hawaiian/ Other Pacific Islander alone | 212 | 0 | 207 | 0 | 339 | 0 | 22 | 0 | 109 | 0 | 82 | 0 |
| Other race alone | 6,352 | 1 | 8,502 | 1 | 5,853 | 0 | 1,559 | 1 | 1,792 | 1 | 1,383 | 1 |
| Two or more races | 19,753 | 2 | 25,952 | 2 | 25,175 | 2 | 4,912 | 2 | 8,904 | 2 | 8,538 | 3 |

*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table DP05 – "ACS Demographic and Housing Estimates"*

Mapping the predominant race or ethnicity by Census tract can illustrate in part the demographic distribution of the HUD-identified MID. This representation continues to be challenged by Hispanics and Latinos being an ethnicity that spans races in addition to the fact that significant minority populations are rarely monolithic. Figure 11 is able to highlight Mount Vernon as a predominantly Black and African American community; however, it obscures the Black and African American presence in Yonkers, New Rochelle, and Port Chester – all three disaster-impacted communities with significant populations of Black, indigenous, and people of color (Figure 12).




**Map Legend**

- Hispanic or Latino
- White alone *
- Black or African American alone *
- Asian alone *
- American Indian/Alaska Native alone *
- Native Hawaiian/Other Pacific Islander alone *
- Other Race alone *
- Two or more races *
- Other

**Strength of Predominance**

0% to 10%

90% to 100%

**Top 25 Census Tracts by Population Having Predominant Race or Ethnicity Other Than White Alone (Non-Hispanic or Latino)**

| *Census Tract* | *Place* | *Pop* | *% Hispanic/ Latino* | *% White** | *% Black/ African Amer.** | *% Asian** | *% Amer. Indian/ Alaska Native** | *% Native Hawaiian/ Pacific Islander** | *% Other Race** | *% 2 or More Races* |
|---|---|---|---|---|---|---|---|---|---|---|
| C.T. 141 | Peekskill | 6525 | 44.4 | 32.2 | 16.3 | 1.9 | 0.2 | 0 | 1 | 4 |
| C.T. 4.01 | Yonkers | 6059 | 48.8 | 11.6 | 31.8 | 3.4 | 0.1 | 0.1 | 0.9 | 3.4 |
| C.T. 80 | Port Chester | 5963 | 80.1 | 10.9 | 4.5 | 1.6 | 0.1 | 0 | 1.2 | 1.5 |
| C.T. 144 | Peekskill | 5942 | 40.8 | 26.7 | 24.4 | 4 | 0.1 | 0 | 0.6 | 3.2 |
| C.T. 109.02 | Greenburgh | 5938 | 24.4 | 28 | 33.3 | 9.3 | 0.1 | 0 | 1.5 | 3.3 |
| C.T. 1.03 | Yonkers | 5850 | 52.6 | 5.5 | 35.5 | 3 | 0.3 | 0.1 | 1 | 2 |
| C.T. 91 | White Plains | 5811 | 57 | 21.2 | 12.4 | 5.3 | 0.1 | 0 | 1.2 | 2.8 |
| C.T. 62 | New Rochelle | 5796 | 71.1 | 15.3 | 9.3 | 1.5 | 0 | 0 | 0.9 | 1.8 |
| C.T. 65 | New Rochelle | 5762 | 37.8 | 23.7 | 29 | 4.3 | 0.1 | 0 | 1.4 | 3.7 |
| C.T. 1.01 | Yonkers | 5731 | 73 | 3.9 | 18.7 | 1.8 | 0.1 | 0 | 1.1 | 1.3 |
| C.T. 11.02 | Yonkers | 5598 | 57.2 | 13 | 22.4 | 3.5 | 0.5 | 0 | 1.3 | 2 |
| C.T. 64 | New Rochelle | 5504 | 34.8 | 14.1 | 43.9 | 3 | 0.3 | 0 | 0.9 | 3.1 |
| C.T. 133.04 | Ossining Town | 5391 | 62.9 | 22.3 | 10.3 | 2.2 | 0.2 | 0 | 0.4 | 1.7 |
| C.T. 12 | Yonkers | 5336 | 71 | 10.1 | 14.1 | 2.7 | 0.1 | 0 | 0.5 | 1.5 |
| C.T. 136 | Ossining | 5321 | 43.7 | 37.8 | 11.2 | 4.4 | 0.2 | 0 | 0.5 | 2.2 |
| C.T. 7.02 | Yonkers | 5272 | 31 | 30.6 | 29.5 | 4.3 | 0.2 | 0 | 1.1 | 3.4 |
| C.T. 73 | Mamaroneck | 5256 | 44.4 | 42.9 | 4.7 | 4 | 0.1 | 0 | 1.4 | 2.7 |
| C.T. 59.01 | New Rochelle | 5138 | 42.5 | 23.7 | 23.1 | 6.4 | 0.1 | 0.1 | 1.3 | 2.9 |
| C.T. 79.02 | Port Chester | 5089 | 77.5 | 14.8 | 3.4 | 1.6 | 0 | 0 | 1.3 | 1.4 |
| C.T. 109.03 | Greenburgh | 5084 | 33.2 | 16.2 | 40.1 | 6.2 | 0.2 | 0 | 0.9 | 3.1 |
| C.T. 81 | Port Chester | 5026 | 63.3 | 27.1 | 2.4 | 2.3 | 0 | 0 | 1.9 | 3 |
| C.T. 34 | Mount Vernon | 4912 | 14.8 | 3.2 | 77.2 | 0.7 | 0 | 0 | 1 | 3.1 |
| C.T. 42 | Mount Vernon | 4879 | 18.4 | 18.3 | 54.7 | 1.9 | 0.1 | 0.1 | 2.2 | 4.3 |
| C.T. 8.03 | Yonkers | 4786 | 44.9 | 32.2 | 13.1 | 5.6 | 0.1 | 0 | 0.8 | 3.3 |
| C.T. 78 | Port Chester | 4761 | 75.2 | 11.2 | 9.9 | 1.9 | 0.1 | 0 | 0.7 | 1 |

*Sources: U.S. Census Bureau's 2020 Redistricting File, PL 94-171; ESRI*

** Non-Hispanic or Latino and reporting a single race/ethnicity*

Figure 12: Predominant Race and Ethnicity, Westchester County

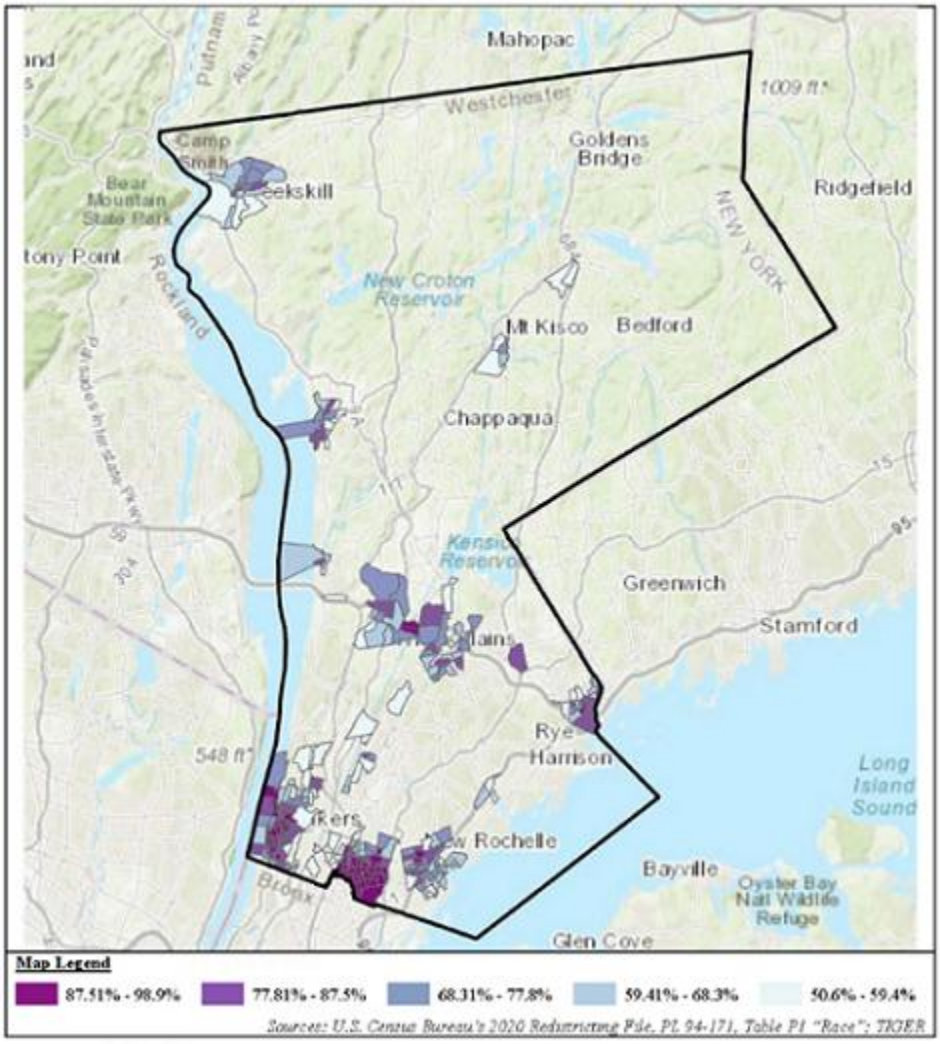



Figure 13: Majority Black, Indigenous, and People of Color (BIPOC) Areas in Westchester County

Table 12 takes another approach to analyzing race and ethnicity in the HUD-identified MID by identifying those census tracts where non-Hispanic or Latino Whites are the single largest racial or ethnic group despite being a minority of the total population. Altogether, nearly 45% of Westchester County's population resides in Census tracts that are majority minority. Furthermore, these tracts are located predominately in the areas of the County that experienced the greatest damage from Hurricane Ida according to OpenFEMA data analyzed earlier, indicating that racial and ethnic minorities experienced disproportionately greater impacts from Hurricane Ida.

Table 12: Majority Minority Census Tracts in Westchester County with Non-Hispanic/Latino Whites as the Predominant Race/Ethnicity

| *Census Tract* | *Place* | *Pop* | *% Hispanic/ Latino* | *% White** | *% Black/ African American** | *% Asian** | *% Amer. Indian/ Alaska Native** | *% Native Hawaiian/ Pacific Islander** | *% Other Race** | *% Two or More Races* |
|---|---|---|---|---|---|---|---|---|---|---|
| C.T. 8.01 | Yonkers | 5950 | 33.8 | 46 | 9.1 | 7.4 | 0.3 | 0 | 1 | 2.4 |
| C.T. 24.03 | Yonkers | 5891 | 34.1 | 42.8 | 12.4 | 6.2 | 0.2 | 0 | 1.4 | 2.9 |
| C.T. 89.01 | White Plains | 5676 | 25.5 | 48.3 | 9.2 | 12.3 | 0.1 | 0 | 0.9 | 3.8 |
| C.T. 59.02 | New Rochelle | 5654 | 20.6 | 47.2 | 20.9 | 6.8 | 0 | 0 | 1 | 3.4 |
| C.T. 21.04 | Yonkers | 5290 | 30.2 | 46.1 | 10.5 | 10.4 | 0 | 0 | 0.5 | 2.2 |
| C.T. 151 | Mount Vernon | 5258 | 13.7 | 44.3 | 32.3 | 3.6 | 0.1 | 0.1 | 1.2 | 4.7 |
| C.T. 95 | White Plains | 5175 | 33.3 | 44.3 | 12.9 | 5.9 | 0.1 | 0 | 1.1 | 2.4 |
| C.T. 60 | New Rochelle | 4335 | 31.9 | 34.1 | 22.7 | 6.7 | 0.1 | 0 | 1.1 | 3.4 |
| C.T. 90 | White Plains | 4199 | 34.8 | 35.4 | 14.2 | 12.2 | 0 | 0 | 0.6 | 2.8 |
| C.T. 135 | Ossining | 4060 | 39.9 | 46.7 | 5.6 | 4.1 | 0.1 | 0 | 0.7 | 3 |
| C.T. 21.01 | Yonkers | 4035 | 25.8 | 48 | 11.4 | 12 | 0.1 | 0 | 0.7 | 2.1 |
| C.T. 17.01 | Yonkers | 3913 | 38.9 | 45.7 | 6.9 | 4.8 | 0.2 | 0 | 1 | 2.6 |
| C.T. 39 | Mount Vernon | 3801 | 21.9 | 33.8 | 28.4 | 2.8 | 0.2 | 0 | 4 | 8.9 |
| C.T. 9 | Yonkers | 3607 | 36.5 | 39.8 | 11.6 | 9.1 | 0.1 | 0.1 | 0.3 | 2.6 |
| C.T. 7.01 | Yonkers | 3455 | 29.5 | 40.8 | 19.3 | 6.3 | 0.1 | 0 | 0.8 | 3.1 |
| C.T. 24.02 | Yonkers | 3418 | 32 | 45.3 | 12.8 | 5 | 0 | 0 | 1.3 | 3.6 |
| C.T. 14.03 | Yonkers | 3353 | 36.9 | 43.6 | 8.2 | 7.7 | 0.3 | 0 | 0.9 | 2.4 |
| C.T. 38 | Mount Vernon | 3342 | 23.5 | 36.1 | 29 | 4.6 | 0.3 | 0 | 1.2 | 5.3 |
| C.T. 57.03 | New Rochelle | 3291 | 31.2 | 47.5 | 12.4 | 5.6 | 0.2 | 0 | 0.6 | 2.5 |
| C.T. 57.02 | New Rochelle | 3266 | 30.9 | 44.4 | 17.3 | 4.4 | 0.1 | 0 | 0.7 | 2.2 |
| C.T. 134.01 | Ossining | 3208 | 35.5 | 37.2 | 13.7 | 10.4 | 0 | 0 | 0.7 | 2.5 |
| C.T. 57.04 | New Rochelle | 3172 | 31.5 | 47.1 | 12.6 | 5.1 | 0 | 0.1 | 1.2 | 2.4 |
| C.T. 24.04 | Yonkers | 2924 | 34.1 | 43.5 | 7.4 | 10.7 | 0.1 | 0 | 1.3 | 2.8 |
| C.T. 83.01 | Rye Town | 2779 | 39.4 | 48.3 | 3.5 | 3.6 | 0 | 0 | 1 | 4.2 |
| C.T. 88.02 | Rye Brook | 2637 | 23.4 | 44.7 | 12.9 | 14 | 0.2 | 0 | 0.5 | 4.4 |
| C.T. 123.01 | North Castle | 2401 | 36.2 | 48.8 | 5.4 | 6.6 | 0 | 0 | 0.3 | 2.7 |
| C.T. 15.05 | Yonkers | 2194 | 33.5 | 37.1 | 20.2 | 6.1 | 0.1 | 0 | 1 | 2 |
| C.T. 21.07 | Yonkers | 1592 | 22 | 43 | 12.6 | 18.6 | 0.3 | 0.3 | 1.3 | 2 |
| C.T. 45 | Mount Vernon | 1548 | 15.7 | 44.9 | 32.5 | 2.4 | 0.1 | 0 | 1.1 | 3.4 |
| C.T. 9810 | Mount Pleasant | 1121 | 21.2 | 46.7 | 22.8 | 7.1 | 0 | 0 | 0.3 | 1.9 |
| C.T. 9830 | Bedford | 1038 | 18.1 | 40.8 | 37.5 | 2.3 | 0.9 | 0 | 0.3 | 0.2 |
| C.T. 9840 | Cortlandt | 781 | 36.5 | 49.2 | 11 | 0.5 | 0.6 | 0 | 0.5 | 1.7 |

*Source: U.S. Census Bureau's 2020 Redistricting File, PL 94-171*

Not only do these areas of significant racial and ethnic minorities have significant overlap with the areas experiencing the greatest storm impacts as indicated by claim data, they also coincide with the communities indicated as "Disadvantaged Communities" by the New York State Department of Environmental Conservation (DEC) Climate Justice Working Group (Figure 14) and by the White House Council on Environmental Quality (CEQ) Climate and Economic Justice Screening Tool (CEJST) (Figure 15). Both the New York State and Federal environmental justice initiatives strive to identify communities with a history of being underserved while also being overburdened by pollution. A lack of historic investment is known to result in systems less able to withstand even moderate weather events that exceed the systems' outdated capacity. An event such as Hurricane Ida that tested the design capacity of storm systems across the region was significantly more severe for disadvantaged communities due to their patterns of disinvestment.

Interestingly, HUD's Office of Policy Development and Research's definition of racially or ethnically concentrated areas of poverty (R/ECAPs) identifies less than five (five) Census tracts as R/ECAPs in the entirety of the disaster-declared counties, and only one within the City of Yonkers overlaps with the areas identified as having the greatest

impacts from Hurricane Ida according to OpenFEMA data (Figure 16). This departure from the trends observed in the other data sources analyzed to this point may reflect an emphasis on poverty over other indicators of vulnerability and disadvantage, especially in a region considered affluent compared to national averages.

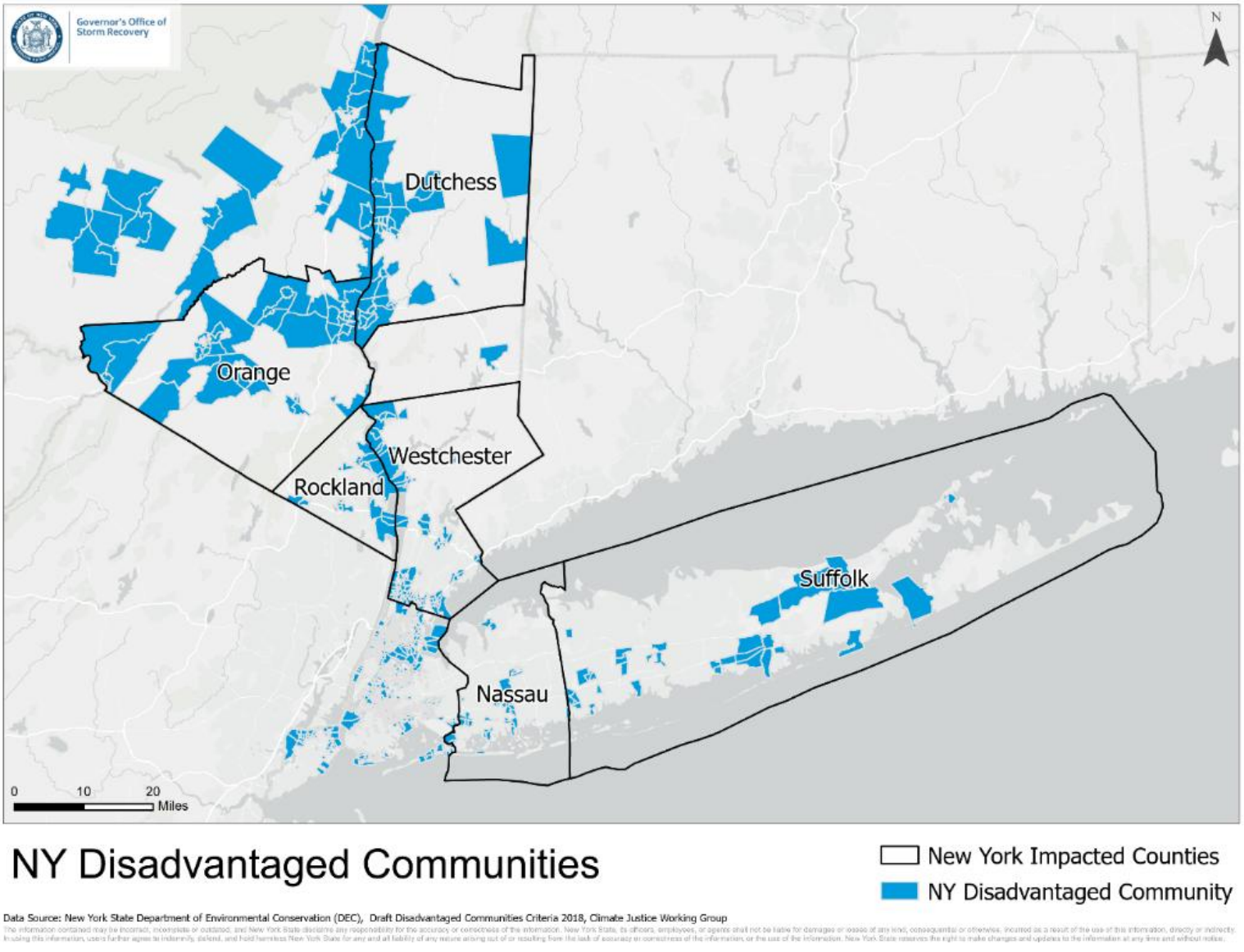



Figure 14: Census Tracts in the Mid-Hudson, Long Island and New York City Regions Identified as Draft Disadvantaged Communities

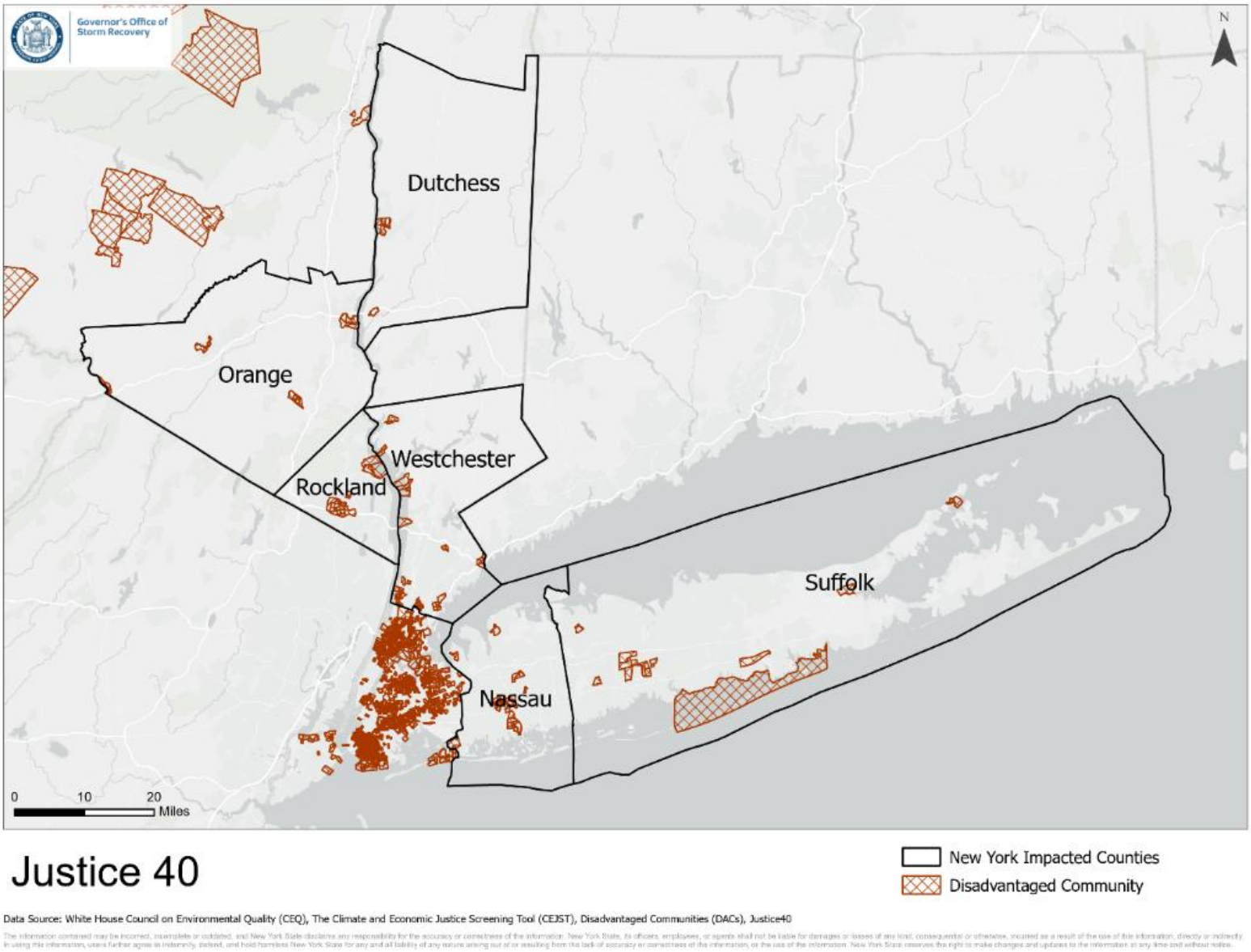



Figure 15: Census Tracts Identified as Disadvantaged Communities by the Climate and Environmental Justice Screening Tool

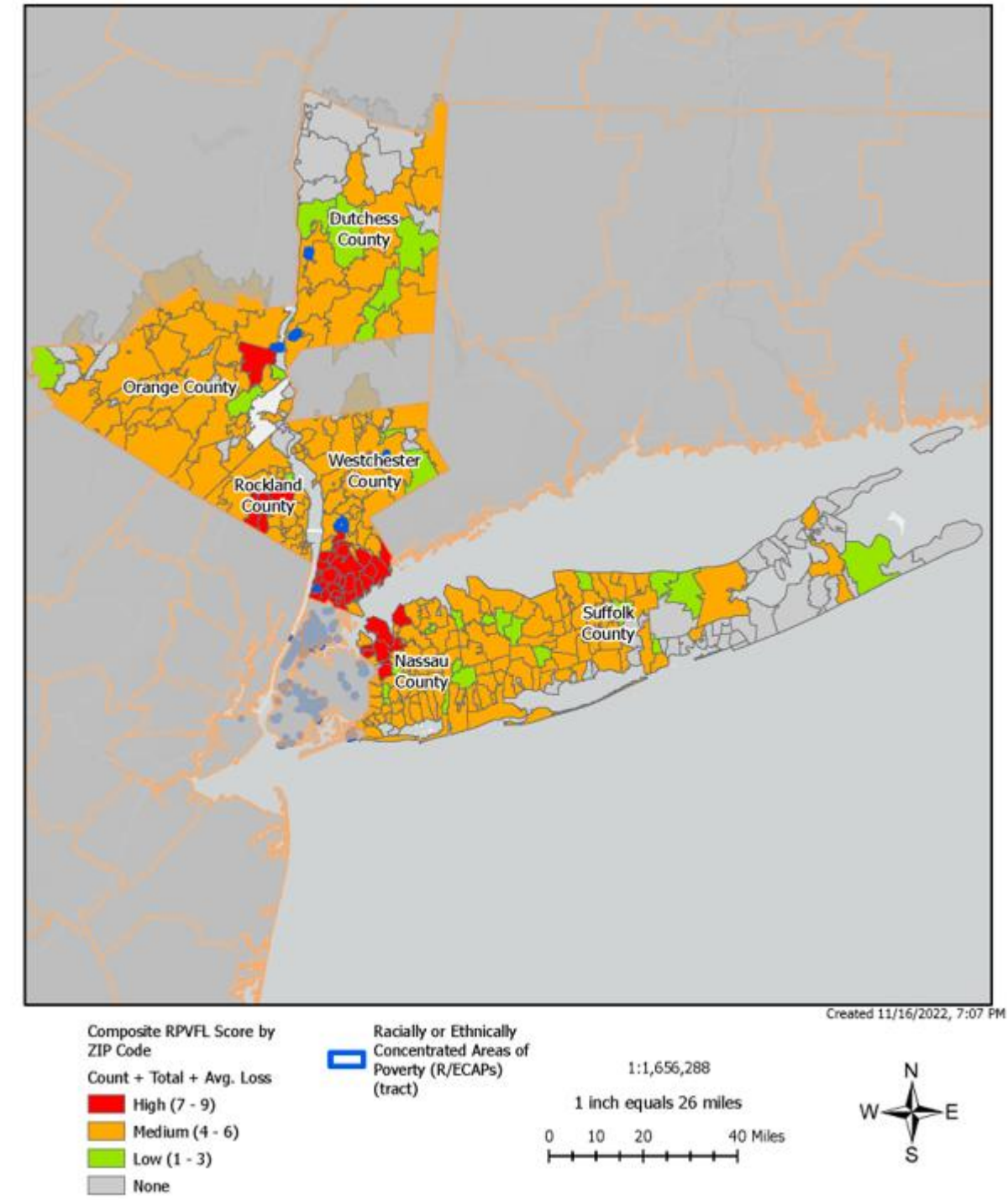



Figure 16: Racially or Ethnically Concentrated Areas of Poverty Compared to Areas of Greatest Disaster Impact

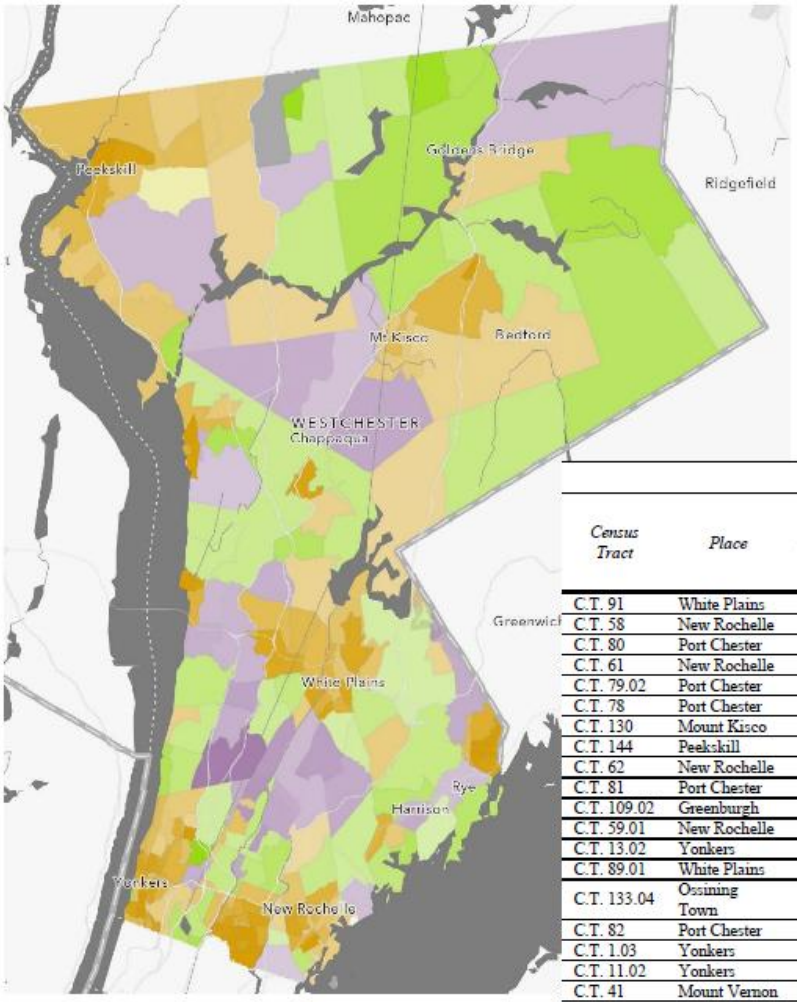
Continuing to examine racial and ethnic vulnerabilities through the lens of immigration and predominant place of birth, the disaster-declared counties together are nearly one fifth (1/5) or twenty percent (20%) foreign born. Of these, on average less than sixty percent (60%) have become naturalized U.S. Citizens since arriving in the Country. Across all six (6) disaster-declared counties, immigrants predominantly hail from Latin America, further reinforcing

the predominance of Hispanic and Latino persons in the area's overall racial and ethnic demographics (Table 13). Conversely, comparatively little of the counties' Black and African American populations can be associated with recent immigration from Africa and thus are more probably indicative of multi-generational and/or systemic patterns of discrimination and disenfranchisement.

Table 11: National Origin of the Disaster-Declared Counties

| *Foreign Born Persons; Region of Birth* | **Westchester County** | | **Nassau County** | | **Suffolk County** | | **Rockland County** | | **Orange County** | | **Dutchess County** | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* |
| Total Population | 968,738 | | 1,355,683 | | 1,481,364 | | 325,213 | | 382,077 | | 293,524 | |
| Foreign Born | 246,002 | 25 | 303,618 | 22 | 227,360 | 15 | 68,929 | 21 | 44,088 | 12 | 34,436 | 12 |
| Foreign Born U.S. Citizens | 141,554 | 58 | 204,317 | 67 | 135,219 | 60 | 40,903 | 59 | 25,470 | 58 | 20,072 | 58 |
| Born in Latin America | 137,157 | 56 | 152,845 | 50 | 130,689 | 58 | 37,174 | 54 | 24,570 | 56 | 16,041 | 47 |
| Born in Africa | 9,822 | 4 | 6,199 | 2 | 6,691 | 3 | 2,001 | 3 | 1,289 | 3 | 1,610 | 5 |
| Born in Europe | 49,651 | 20 | 45,143 | 15 | 38,733 | 17 | 12,019 | 17 | 8,196 | 19 | 7,219 | 21 |
| Born in Asia | 45,832 | 19 | 96,880 | 32 | 48,478 | 21 | 16,258 | 24 | 9,027 | 21 | 8,713 | 25 |
| Born in North America (outside U.S.) | 2,841 | 1 | 2,040 | 1 | 2,314 | 1 | 1,331 | 2 | 918 | 2 | 727 | 2 |
| Born in Oceania | 699 | 0 | 511 | 0 | 455 | 0 | 146 | 0 | 88 | 0 | 126 | 0 |

*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table DP02 – "Selected Social Characteristics in the United States"*




**Map Legend**

- Latin America
- Africa
- Europe
- Asia
- Northern America
- Oceania
- Ties of N/A

**Strength of Predominance**

0% to 17%

92% to 100%

**Top 25 Census Tracts by Population of Foreign-Born Persons**

| *Census Tract* | *Place* | *Pop Foreign Born* | *% Total Pop Foreign Born* | *% Foreign Born U.S. Citizens* | *% Foreign Born in Latin America* | *% Foreign Born in Africa* | *% Foreign Born in Europe* | *% Foreign Born in Asia* | *% Foreign Born in Northern America* | *% Foreign Born in Oceania* |
|---|---|---|---|---|---|---|---|---|---|---|
| C.T. 91 | White Plains | 2698 | 46.5 | 32.7 | 83.5 | 0 | 6.7 | 9.7 | 0.1 | 0 |
| C.T. 58 | New Rochelle | 2629 | 48.7 | 34.3 | 88.9 | 1.5 | 7 | 2 | 0.6 | 0 |
| C.T. 80 | Port Chester | 2495 | 54.1 | 30.9 | 98.8 | 0 | 1.2 | 0 | 0 | 0 |
| C.T. 61 | New Rochelle | 2458 | 49.2 | 40 | 72.9 | 6.9 | 4.6 | 15.3 | 0.4 | 0 |
| C.T. 79.02 | Port Chester | 2409 | 55.4 | 46.8 | 93.2 | 0 | 5 | 1.8 | 0 | 0 |
| C.T. 78 | Port Chester | 2366 | 48.6 | 33.3 | 86.4 | 0.3 | 11.7 | 1.5 | 0 | 0 |
| C.T. 130 | Mount Kisco | 2362 | 35.8 | 51.7 | 47.6 | 2.3 | 38.9 | 7 | 4.2 | 0 |
| C.T. 144 | Peekskill | 2310 | 36.9 | 45.5 | 86.4 | 0 | 12.3 | 1.3 | 0 | 0 |
| C.T. 62 | New Rochelle | 2286 | 40.4 | 41.6 | 81.8 | 0.6 | 17.3 | 0.3 | 0 | 0 |
| C.T. 81 | Port Chester | 2110 | 44.8 | 59.8 | 91.7 | 0.8 | 5.8 | 1.7 | 0 | 0 |
| C.T. 109.02 | Greenburgh | 2096 | 34.6 | 61.7 | 62.7 | 2.5 | 4.2 | 30.6 | 0 | 0 |
| C.T. 59.01 | New Rochelle | 2040 | 40.4 | 39.8 | 61.8 | 8 | 20 | 9.9 | 0.3 | 0 |
| C.T. 13.02 | Yonkers | 2036 | 47.2 | 31.7 | 84.5 | 1.6 | 2.8 | 11.1 | 0 | 0 |
| C.T. 89.01 | White Plains | 2029 | 32.4 | 74.5 | 51.4 | 3.2 | 16.9 | 27.1 | 1.4 | 0 |
| C.T. 133.04 | Ossining Town | 2013 | 42.2 | 51.4 | 90.6 | 0 | 3.5 | 5.9 | 0 | 0 |
| C.T. 82 | Port Chester | 2006 | 26.3 | 51 | 76.2 | 1.1 | 13.4 | 9.3 | 0 | 0 |
| C.T. 1.03 | Yonkers | 2000 | 39.5 | 50. 5 | 57.1 | 40.6 | 2.3 | 0 | 0 | 0 |
| C.T. 11.02 | Yonkers | 1993 | 34.3 | 53.9 | 69.6 | 7.4 | 10.6 | 12.3 | 0 | 0 |
| C.T. 41 | Mount Vernon | 1855 | 42.9 | 71.2 | 86.3 | 3 | 7.4 | 3.3 | 0 | 0 |
| C.T. 128.04 | Bedford | 1810 | 39.1 | 29.9 | 68.3 | 0 | 15.3 | 13.3 | 3.1 | 0 |
| C.T. 64 | New Rochelle | 1796 | 30.3 | 63.3 | 81 | 11.4 | 3.6 | 4 | 0 | 0 |
| C.T. 13.05 | Yonkers | 1794 | 42.6 | 63.8 | 80.3 | 7 | 0 | 11.2 | 1.5 | 0 |
| C.T. 73 | Mamaroneck | 1776 | 35 | 34.8 | 70.7 | 5.7 | 15.1 | 8.4 | 0 | 0 |
| C.T. 4.04 | Yonkers | 1773 | 53 | 69 | 78.8 | 5 | 7.3 | 8.9 | 0 | 0 |
| C.T. 116.01 | Sleepy Hollow | 1766 | 57.1 | 42.5 | 86.4 | 0 | 8.3 | 5.4 | 0 | 0 |

*Sources: 2016-2020 U.S. Census American Community Survey, 5-year Estimates, Table B05002; ESRI*

Figure 16: Predominant Place of National Origin, Westchester County

Looking more closely at the distribution of national origin across the HUD-identified MID, the same communities in lower Westchester County that are majority minority and are historically disadvantaged once again have the most significant immigrant populations, with the most prevalent birthplace being Latin America (Figure 17).

The high concentrations of Hispanic or Latino populations and immigrants born in Latin America across the disaster-declared counties as a whole in addition to the historically disadvantaged communities of Westchester County correlate closely to data on Limited English Proficiency that guided RHC's Language Access Plan (LAP) and community engagement efforts. Over twelve percent (12%) of Westchester County residents report speaking English "less than very well", the greatest percentage of such persons across the disaster-declared

counties. Furthermore, Spanish is most consistently the language spoken at home by persons speaking English "less than very well".

Drilling down into the language access needs, RHC evaluated the total quantity of speakers across the disaster-declared counties in addition to the speakers within the HUD-identified MID Westchester County and also examined language prevalence within and across LMI census block groups. This tiered analysis is presented in part in Figure 18 and informed RHC's decision to offer summary translations of this Action Plan and critical Program documents in a variety of languages other than Spanish and to monitor requests for additional translations to understand more completely the degree to which one of these other LEP populations was impacted by Hurricane Ida.

**Top Languages Spoken in Disaster Declared Counties**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 290,417 | 6.4% |
| Yiddish | 25,001 | 0.6% |
| Chinese | 24,140 | 0.5% |
| Italian | 18,623 | 0.4% |
| French Creole | 16,749 | 0.4% |
| Korean | 11,546 | 0.3% |
| Other Asian Lang. | 10,674 | 0.2% |
| Polish | 7,932 | 0.2% |
| Portuguese | 7,539 | 0.2% |
| Urdu | 6,697 | 0.1% |
| Other Indic Lang. | 6,315 | 0.1% |
| Russian | 6,000 | 0.1% |
| Tagalog | | |
| French | | |
| Hindi | | |

**Top Languages Spoken in Westchester County**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 76,980 | 8.4% |
| Italian | 6,213 | 0.7% |
| Portuguese | 3,756 | 0.4% |
| Chinese | 3,601 | 0.4% |
| Korean | 2,377 | 0.3% |
| Japanese | 2,335 | 0.3% |
| Other Asian Lang. | 1,749 | 0.2% |
| Arabic | 1,466 | 0.2% |
| Tagalog | 1,346 | 0.1% |
| French | 1,284 | 0.1% |
| Other Indo-Eur. Lang. | 1,267 | 0.1% |
| Polish | 1,170 | 0.1% |

**Top Languages Spoken in Nassau County**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 81,838 | 6.4% |
| Chinese | 11,378 | 0.9% |
| Italian | 6,798 | 0.5% |
| French Creole | 6,445 | 0.5% |
| Korean | 5,295 | 0.4% |

**Top Languages Spoken in Suffolk County**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 91,441 | 6.5% |
| Chinese | 5,948 | 0.4% |
| Polish | 3,879 | 0.3% |
| French Creole | 3,748 | 0.3% |
| Italian | 3,724 | 0.3% |

**Top Languages Spoken in Rockland County**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 18,153 | 6.1% |
| Yiddish | 13,760 | 4.6% |
| French Creole | 5,555 | 1.9% |
| Russian | 1,500 | 0.5% |
| Chinese | 1,317 | 0.4% |
| Other Asian Lang. | 1,278 | 0.4% |
| Hebrew | 1,112 | 0.4% |
| Italian | | |
| Polish | | |

**Top Languages Spoken in Orange County**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 13,789 | 4.0% |
| Yiddish | 10,826 | 3.1% |
| Chinese | 714 | 0.2% |
| Italian | 439 | 0.1% |
| Hebrew | 361 | 0.1% |
| Korean | 345 | 0.1% |
| Polish | 339 | 0.1% |

**Top Languages Spoken in Dutchess County**

| Language | LEP Speakers | % of Total Pop |
|---|---|---|
| Spanish | 8,216 | 2.9% |
| French Creole | 1,182 | 0.4% |
| Korean | 610 | 0.2% |
| Italian | 588 | 0.2% |
| Arabic | 540 | 0.2% |
| | | 0.1% |
| | | 0.1% |

**Top Languages Spoken More Predominantly in LMI Block Groups in Westchester County**

| Language | LEP Speakers in LMI Block Groups | % of LMI Block Group Pop | Factor Compared to Total Pop |
|---|---|---|---|
| Spanish | 62,532 | 16.5% | 1.0 |
| Italian | 3,126 | 0.8% | 0.2 |
| Portuguese | 2,737 | 0.7% | 0.8 |
| French | 809 | 0.2% | 0.5 |
| Arabic | 792 | 0.2% | 0.3 |
| Tagalog | 760 | 0.2% | 0.4 |
| Other Indo-Eur. Lang. | 624 | 0.2% | 0.2 |
| Other Indic Lang. | 585 | 0.2% | 0.5 |
| French Creole | 484 | 0.1% | 0.9 |
| African Languages | 395 | 0.1% | 0.7 |
| Hindi | 382 | 0.1% | 0.4 |
| Urdu | 290 | | |
| Thai | 184 | | |
| Other/Unspecified | | | |

**Languages Spoken by >5% of Block Group Population**

| Language | Number of Block Groups | Number of LMI Block Groups |
|---|---|---|
| Spanish | 335 | 245 |
| Yiddish | 14 | 14 |
| French Creole | 13 | 10 |
| Chinese | 8 | 3 |
| Persian | 6 | 4 |
| Polish | 3 | 3 |
| Portuguese | 3 | 1 |
| Other Asian Lang. | 3 | 1 |
| Korean | 3 | 0 |
| Italian | 2 | 2 |
| Japanese | 2 | 0 |
| French | 1 | 1 |
| Russian | 1 | |

*Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001: "Language Spoken at Home by Ability to Speak English"*

Figure 18: Tiered Analysis of Languages Spoken by Persons with Limited English Proficiency (LEP)

Throughout the analysis of race and ethnicity, indigenous populations are minimally represented. Taken together, American Indians, Alaska Natives, Native Hawaiians, and other Pacific Islanders represent less than one percent (1%) of the total population of the disaster declared counties (Table 14). Within the HUD-identified MID of Westchester County, that increases slightly to one percent (1%); however, there is no indication that native persons were especially impacted by Hurricane Ida as a result of their native status. In particular, the only tribal lands within the disaster-declared counties are the Poospatuck and Shinnecock territories, both within Suffolk County and associated with tribes not among the specified list of the American Community Survey (Figure 19). Both tribal territories are in areas having zero storm impact according to OpenFEMA data.

Table 14: Predominant Tribal Affiliations of Indigenous Persons Residing in Disaster-Declared Counties

| | **Westchester County** | | **Nassau County** | | **Suffolk County** | | **Rockland County** | | **Orange County** | | **Dutchess County** | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| *Tribal Designation* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* |
| Total Population | 968,738 | | 1,355,683 | | 1,481,364 | | 325,213 | | 382,077 | | 293,524 | |
| Total Specified Amer. Indian tribe | 1,956 | 0.2 | 2,205 | 0.2 | 2,044 | 0.1 | 397 | 0.1 | 1,184 | 0.3 | 518 | 0.2 |
| Most Prevalent tribe | Central Amer. Indian | | Central Amer. Indian | | Central Amer. Indian | | Central Amer. Indian | | Central Amer. Indian | | Mexican Amer. Indian | |
| Total Specified Alaska Native tribe | 0 | 0.0 | 0 | 0.0 | 78 | 0.0 | 0 | 0.0 | 0 | 0.0 | 116 | 0.0 |
| Two or more tribes | 0 | 0.0 | 23 | 0.0 | 187 | 0.0 | 1 | 0.0 | 74 | 0.0 | 14 | 0.0 |
| Amer. Indian/Alaska Native; Unspecified tribe | 1,526 | 0.2 | 1,245 | 0.1 | 1,863 | 0.1 | 204 | 0.1 | 184 | 0.0 | 209 | 0.1 |

*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates,*
*Table B02014 – "American Indian and Alaska Native Alone for Selected Tribal Groupings"*

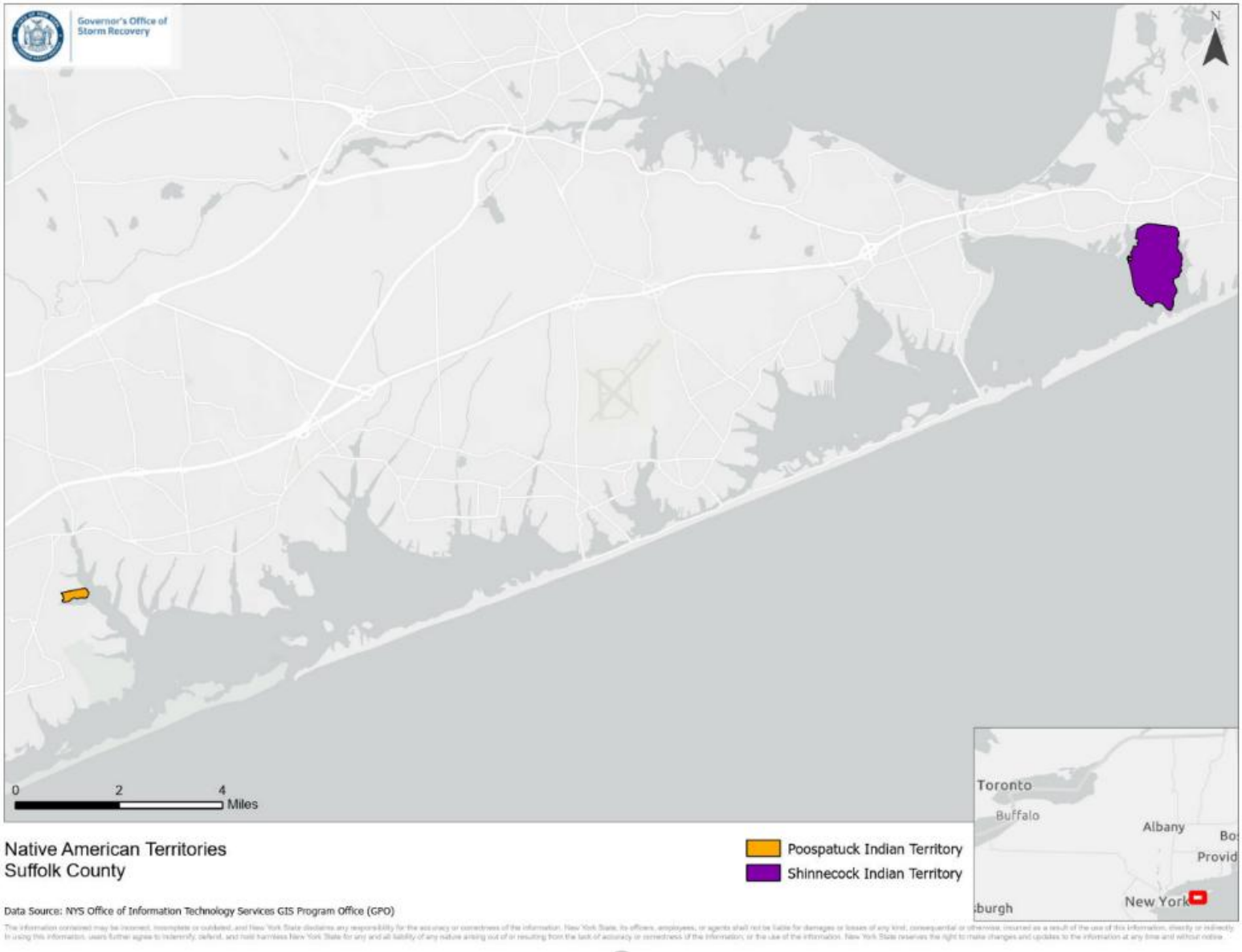


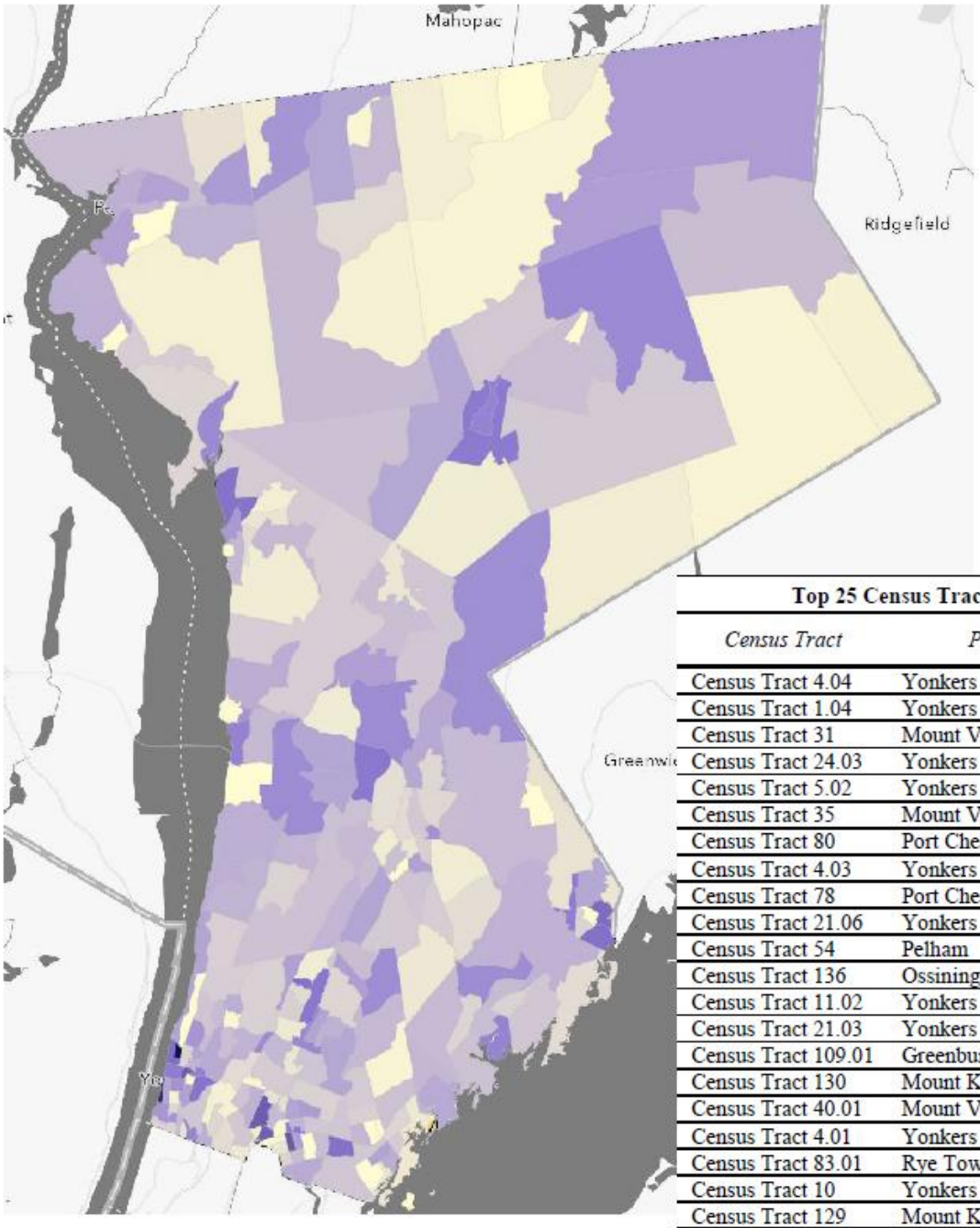

Figure 19: Designated Tribal Communities within the Disaster Declared Counties

Moving from race and ethnicity to other protected class indicators of age, gender, and family composition, just over five percent (5%) of the State population is under five (5) years of age and another seventeen percent (17%) is age sixty-five (65) or older. The disaster-declared counties as a whole and Westchester County specifically mirror this distribution with no notable exceptions (Table 15). Figure 20 and Figure 21 visually present the population of children under five (5) and seniors sixty-five (65) and older across the HUD-identified MID, confirming the absence of localized pockets having the potential for age-based barriers or discriminatory effects. Data on gender identity different from assigned sex is not currently available for the disaster-declared counties from either a federal, New York State, or reputable private/non-profit source.

Table 15: Age and Sex of Residents in the Disaster-Declared Counties

| *Sex by Selected Age Categories* | **Westchester County** | | **Nassau County** | | **Suffolk County** | | **Rockland County** | | **Orange County** | | **Dutchess County** | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* |
| Total Population | 968,738 | | 1,355,683 | | 1,481,364 | | 325,213 | | 382,077 | | 293,524 | |
| Male | 469,087 | 48 | 660,500 | 49 | 728,842 | 49 | 159,592 | 49 | 191,356 | 50 | 145,843 | 50 |
| Female | 499,651 | 52 | 695,183 | 51 | 752,522 | 51 | 165,621 | 51 | 190,721 | 50 | 147,681 | 50 |
| Total Under 5 yrs | 53,891 | 6 | 74,142 | 6 | 79,268 | 5 | 26,419 | 8 | 25,435 | 7 | 13,432 | 5 |
| Male Under 5 yrs | 27,753 | 51 | 38,036 | 51 | 40,168 | 51 | 13,371 | 51 | 13,011 | 51 | 6,823 | 51 |
| Female Under 5 yrs | 26,138 | 49 | 36,106 | 49 | 39,100 | 49 | 13,048 | 49 | 12,424 | 49 | 6,609 | 49 |
| Total 5-18 yrs | 159,017 | 16 | 218,394 | 16 | 234,478 | 16 | 65,484 | 20 | 72,094 | 19 | 41,919 | 14 |
| Male 5-18 yrs | 82,074 | 52 | 112,143 | 51 | 119,876 | 51 | 33,487 | 51 | 37,027 | 51 | 21,448 | 51 |
| Female 5-18 yrs | 76,943 | 48 | 106,251 | 49 | 114,602 | 49 | 31,997 | 49 | 35,067 | 49 | 20,471 | 49 |
| Total 65 yrs + | 165,858 | 17 | 241,563 | 18 | 250,684 | 17 | 51,185 | 16 | 53,427 | 14 | 51,644 | 18 |
| Male 65 yrs + | 70,291 | 42 | 105,003 | 44 | 109,750 | 44 | 22,024 | 43 | 23,594 | 44 | 23,094 | 45 |
| Female 65 yrs + | 95,567 | 58 | 136,560 | 56 | 140,934 | 56 | 29,161 | 57 | 29,833 | 56 | 28,550 | 55 |

*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table S0101 – "Age and Sex"*

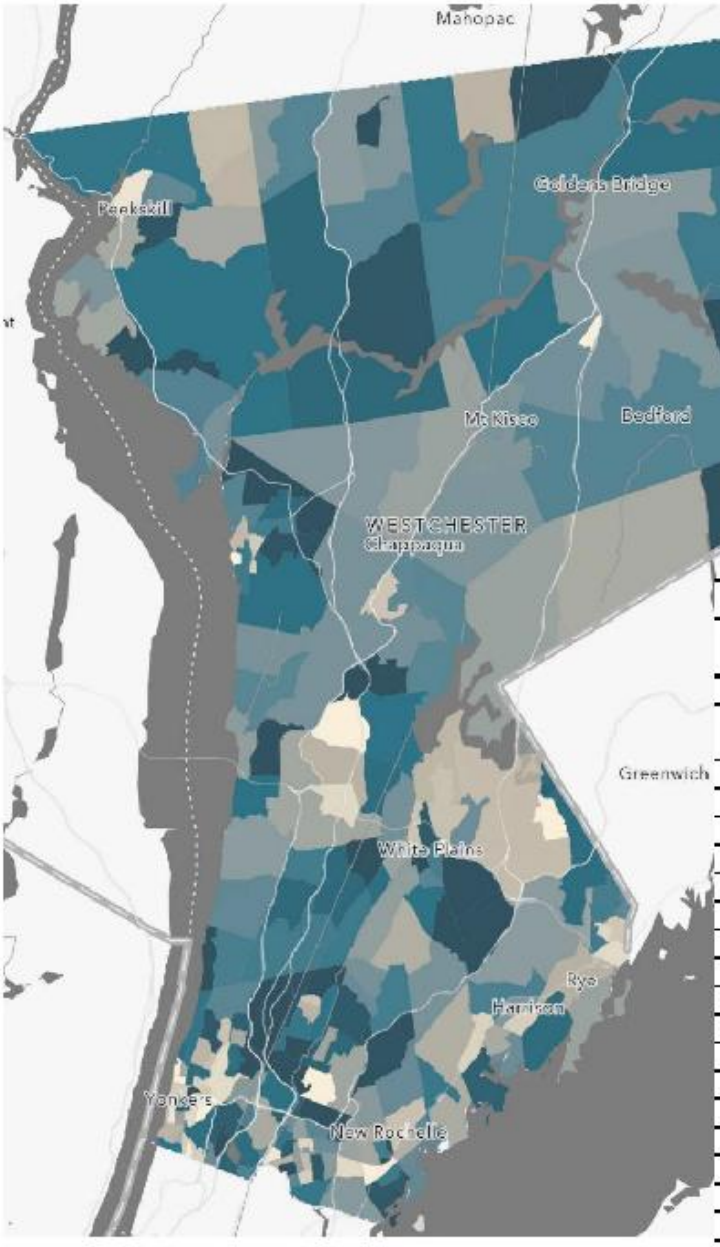



**Top 25 Census Tracts by Percentage Under 5**

| *Census Tract* | *Place* | *Pop <5 Years* | *% Total <5 Years* |
|---|---|---|---|
| Census Tract 4.04 | Yonkers | 595 | 17.8 |
| Census Tract 1.04 | Yonkers | 206 | 15.5 |
| Census Tract 31 | Mount Vernon | 384 | 12.2 |
| Census Tract 24.03 | Yonkers | 606 | 12 |
| Census Tract 5.02 | Yonkers | 209 | 11.9 |
| Census Tract 35 | Mount Vernon | 194 | 11.7 |
| Census Tract 80 | Port Chester | 494 | 10.7 |
| Census Tract 4.03 | Yonkers | 332 | 10.4 |
| Census Tract 78 | Port Chester | 501 | 10.3 |
| Census Tract 21.06 | Yonkers | 248 | 10.2 |
| Census Tract 54 | Pelham | 174 | 10.2 |
| Census Tract 136 | Ossining | 438 | 10.1 |
| Census Tract 11.02 | Yonkers | 581 | 10 |
| Census Tract 21.03 | Yonkers | 282 | 9.8 |
| Census Tract 109.01 | Greenburgh | 210 | 9.8 |
| Census Tract 130 | Mount Kisco | 633 | 9.6 |
| Census Tract 40.01 | Mount Vernon | 351 | 9.5 |
| Census Tract 4.01 | Yonkers | 393 | 9.4 |
| Census Tract 83.01 | Rye Town | 245 | 9.3 |
| Census Tract 10 | Yonkers | 182 | 9.3 |
| Census Tract 129 | Mount Kisco Town | 391 | 9 |
| Census Tract 115 | Tarrytown | 523 | 9 |
| Census Tract 74.02 | Mamaroneck | 272 | 8.9 |
| Census Tract 13.02 | Yonkers | 384 | 8.9 |
| Census Tract 48.01 | Tuckahoe | 273 | 8.7 |

*Sources: 2016-2020 U.S. Census American Community Survey, Table B01001; ESRI*

Figure 20: The percentage of the population that is under age 5 in Westchester County.




**Map Legend**

> 25%

< 7%

No Value

**Top 25 Census Tracts by Percentage 65 and Over**

| *Census Tract* | *Place* | *Pop 65+ Years* | *% Total 65+ Years* |
|---|---|---|---|
| Census Tract 149.03 | Heritage Hills | 2161 | 53.2 |
| Census Tract 148.10 | Jefferson Valley-Yorktown | 963 | 49 |
| Census Tract 9840 | Cortlandt | 266 | 47.2 |
| Census Tract 63.02 | New Rochelle | 992 | 39.4 |
| Census Tract 5.02 | Yonkers | 673 | 38.2 |
| Census Tract 108.03 | Greenburgh | 1304 | 35.8 |
| Census Tract 21.05 | Yonkers | 579 | 35.5 |
| Census Tract 149.09 | Somers | 924 | 35.1 |
| Census Tract 151 | Mount Vernon | 1700 | 34.6 |
| Census Tract 22.02 | Yonkers | 1535 | 32.3 |
| Census Tract 97.03 | White Plains | 1284 | 31.5 |
| Census Tract 49 | Eastchester | 991 | 31.2 |
| Census Tract 22.03 | Yonkers | 523 | 30 |
| Census Tract 14.02 | Yonkers | 436 | 28.4 |
| Census Tract 29 | Mount Vernon | 1150 | 28.1 |
| Census Tract 17.02 | Yonkers | 798 | 27.5 |
| Census Tract 97.01 | White Plains | 853 | 27.5 |
| Census Tract 97.02 | White Plains | 781 | 27.5 |
| Census Tract 137 | Ossining Town | 1504 | 27.1 |
| Census Tract 57.04 | New Rochelle | 845 | 26.8 |
| Census Tract 46 | Bronxville | 771 | 26.8 |
| Census Tract 124 | Pound Ridge | 1361 | 26.6 |
| Census Tract 103 | Hastings-on-Hudson | 843 | 26.1 |
| Census Tract 120 | Mount Pleasant | 1187 | 25.5 |
| Census Tract 22.01 | Yonkers | 572 | 25.5 |

*Sources: 2016-2020 U.S. Census American Community Survey, Table B01001; ESRI*

Figure 21: The percentage of the population that is 65 Years and Over in Westchester County

Similarly, the concentrations of non-institutionalized persons having disabilities is consistently roughly ten percent (10%) of the total population across all of the disaster-declared counties (Table 16). The numbers of institutionalized persons, while an extremely small percentage of the

total population, do vary quite significantly from county to county, likely according to the local quantity and capacity of facilities. Within non-institutionalized persons having a disability, the most common difficulty is movement, followed by cognitive and independent living difficulties. This shows that physical access is not the only barrier that needs to be addressed to serve these groups impacted by Hurricane Ida, but also the need for specialized supportive services personnel.

Table 16: Disability Characteristics of the Disaster-Declared Counties

| | Westchester County | | Nassau County | | Suffolk County | | Rockland County | | Orange County | | Dutchess County | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| *Disability Concerns* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* | *Pop.* | *%* |
| Total Population | 968,738 | | 1,355,683 | | 1,481,364 | | 325,213 | | 382,077 | | 293,524 | |
| Noninstitutionalized with Disability | 91,254 | 9 | 114,064 | 8 | 140,984 | 10 | 28,095 | 9 | 43,718 | 11 | 34,875 | 12 |
| Institutionalized | 12,288 | 1 | 9,556 | >1 | 11,248 | >1 | 1,946 | >1 | 8,690 | 2 | 8,462 | 3 |
| Hearing Difficulties | 23,593 | 2 | 32,133 | 2 | 37,321 | 3 | 8,671 | 3 | 12,022 | 3 | 9,880 | 3 |
| Vision Difficulties | 15,438 | 2 | 16,730 | 1 | 22,710 | 1 | 4,670 | 1 | 7,797 | 2 | 5,612 | 2 |
| Cognitive Difficulties | 33,231 | 3 | 37,627 | 3 | 48,267 | 3 | 10,065 | 3 | 18,621 | 5 | 12,775 | 4 |
| Ambulatory Difficulties | 47,882 | 5 | 59,398 | 4 | 73,208 | 5 | 13,050 | 4 | 21,861 | 6 | 17,145 | 6 |
| Self-Care Difficulties | 20,836 | 2 | 27,814 | 2 | 31,152 | 2 | 6,521 | 2 | 10,214 | 3 | 6,999 | 2 |
| Independent Living Difficulties | 35,865 | 4 | 48,055 | 4 | 54,890 | 4 | 10,505 | 3 | 17,054 | 5 | 13,676 | 5 |

*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table S1810 – "Disability Characteristics"*

The disaster-declared counties are notable for their religious diversity compared to the rest of the nation. The Public Religion Research Institute (PRRI), whose Census of American Religion includes for the first time in the 2020 report a rigorous percentage only estimate of religious demographics at the county level nationwide, developed an index to measure variations in the concentration of global religious populations. The Religious Diversity Index assigns a value of 1 to a county where every religious group is represented and of equal size and a value of 0 to a county where the entire population identifies as a single religious group. Rockland County, with a Religious Diversity Index of 0.869, is the seventh (7th) most religiously diverse county in the country and all of the disaster-declared counties have a score of 0.8 or higher.

Compared to national averages of the percentage of populations as estimated by PRRI, the disaster-declared counties are significantly more Catholic and Jewish while having comparably fewer Protestant Christians, especially White evangelicals (Table 17). Exact population figures are not available due to PRRI's sampling approach. Nevertheless, their analysis indicates four (4) of the six (6) disaster-declared counties are in the top ten (10) counties nationally having the highest concentration of Jewish Americans, with Rockland County being the county with the greatest concentration at eighteen percent (18%). Rockland County and Westchester County both include within their populations of Jewish Americans localized communities that are strongly observant and even maintain their own civic structures separate from State and local government which may present a barrier to participation in grant-funded activities. Current data does not indicate significant storm impacts on any of the larger and more well-known of these

communities; however, smaller such groups may exist within the more heavily impacted areas and is a concern that RHC will be monitoring throughout Program advertisement and intake.

Table 17: County Concentrations of World Religions Compared to National Averages

| *Religious Affiliation* | *U.S. Average* | *Westchester County* | *Nassau County* | *Suffolk County* | *Rockland County* | *Orange County* | *Dutchess County* |
|---|---|---|---|---|---|---|---|
| White evangelical Protestant | 14% | 2% | 3% | 5% | 3% | 6% | 7% |
| White mainline Protestant | 16% | 6% | 6% | 10% | 6% | 11% | 17% |
| White Catholic | 12% | 24% | 29% | 33% | 24% | 26% | 29% |
| Latter-day Saint (Mormon) | 1% | 0% | 0% | 0% | 1% | 1% | 0% |
| Black Protestant | 7% | 10% | 8% | 5% | 5% | 8% | 6% |
| Hispanic Protestant | 4% | 5% | 4% | 5% | 4% | 3% | 2% |
| Hispanic Catholic | 8% | 14% | 11% | 11% | 10% | 8% | 5% |
| Other Christian | 7% | 7% | 7% | 6% | 8% | 7% | 5% |
| Jewish | 1% | 7% | 10% | 4% | 18% | 7% | 2% |
| Muslim | 1% | 1% | 2% | 1% | 1% | 1% | 1% |
| Buddhist | 1% | 1% | 1% | 1% | 1% | 1% | 1% |
| Hindu | 1% | 1% | 1% | 1% | 1% | 0% | 1% |
| Unaffiliated | 23% | 21% | 19% | 21% | 20% | 21% | 26% |

Just under eight percent (8%) of the total disaster-declared county population lives alone, representing almost a quarter of all households. The remaining seventy-seven percent (77%) of households are overwhelmingly married-couple households considered traditional families. Other household types within the disaster-declared counties include: married same-sex couples; cohabitating couples of the same or opposite sexes; and solo householders without spouses or partners who are not living alone (Table 18/Table 19). Within this last group, the householder is often responsible for the care of minor children or senior dependents and that sole householder is female by a 2:1 ratio over male solo householders.

Table 18: Households by Type in the Disaster-Declared Counties

| Household Type | Westchester County | | Nassau County | | Suffolk County | | Rockland County | | Orange County | | Dutchess County | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | *Num.* | *%* | *Num.* | *%* | *Num.* | *%* | *Num.* | *%* | *Num.* | *%* | *Num.* | *%* |
| Total Households | 353,485 | | 449,967 | | 495,667 | | 101,167 | | 130,428 | | 110,095 | |
| Male Householder, Living alone | 36,425 | 10 | 30,952 | 7 | 44,490 | 9 | 7,954 | 8 | 13,453 | 10 | 14,098 | 13 |
| Female Householder, Living alone | 58,009 | 16 | 57,251 | 13 | 65,519 | 13 | 13,458 | 13 | 18,086 | 14 | 16,917 | 15 |
| Married Couple | 182,938 | 52 | 273,471 | 61 | 282,666 | 57 | 61,085 | 60 | 70,634 | 54 | 55,466 | 50 |
| Cohabitating Couple | 16,233 | 5 | 17,818 | 4 | 27,129 | 6 | 3,993 | 4 | 8,336 | 7 | 6,764 | 6 |
| Male Householder, no spouse/partner & not living alone | 15,997 | 5 | 20,177 | 5 | 22,858 | 5 | 4,325 | 4 | 5,567 | 4 | 4,792 | 4 |
| Female Householder, no spouse/partner & not living alone | 43,883 | 12 | 50,298 | 11 | 53,005 | 11 | 10,352 | 10 | 13,352 | 10 | 12,058 | 11 |

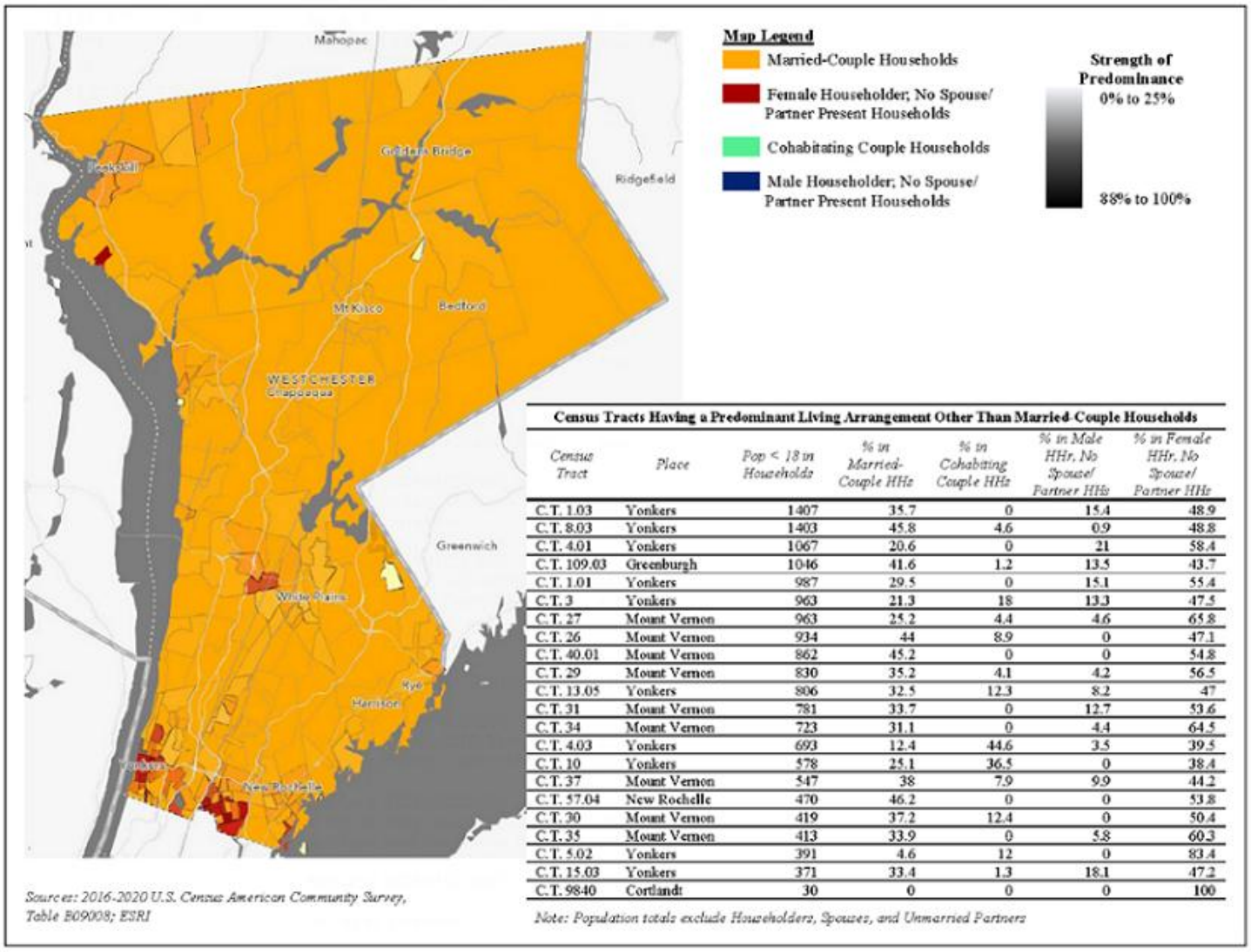
*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table DP02 – "Selected Social Characteristics in the United States"*

Table 19: Households Having Same-Sex Partnerships

| *County* | *Head of Household Population* | *Same Sex Partners* | *% of Households* |
|---|---|---|---|
| Westchester County | 353,485 | 2,810 | 0.3 |
| Nassau County | 449,967 | 2,774 | 0.2 |
| Suffolk County | 495,667 | 3,877 | 0.3 |
| Rockland County | 101,167 | 494 | 0.2 |
| Orange County | 130,428 | 993 | 0.3 |
| Dutchess County | 110,095 | 1,187 | 0.4 |

*Source: 2016-2020 U.S. Census American Community Survey 5-year Estimates, Table B09019 – "Household Type (Including Living Alone) by Relationship"*

Indeed, in each disaster-declared county, female-led households without a spouse or partner present, either living alone or with other dependent household members, are the most prevalent household type after married couples. Looking more closely at the Census tract level within the HUD-identified MID, female sole householders exceed married-couple households to be the predominant household type having children within the Census tract in areas of Yonkers and the majority of Mount Vernon (Figure 22). Looking only at the percentage of Census tract households that are solo female-led, concentrations in excess of the County-wide average appear in New Rochelle, Port Chester, and areas around White Plains that also have high percentages of racial or ethnic minorities, indicating a probable multiplicity of vulnerabilities (Figure 23).



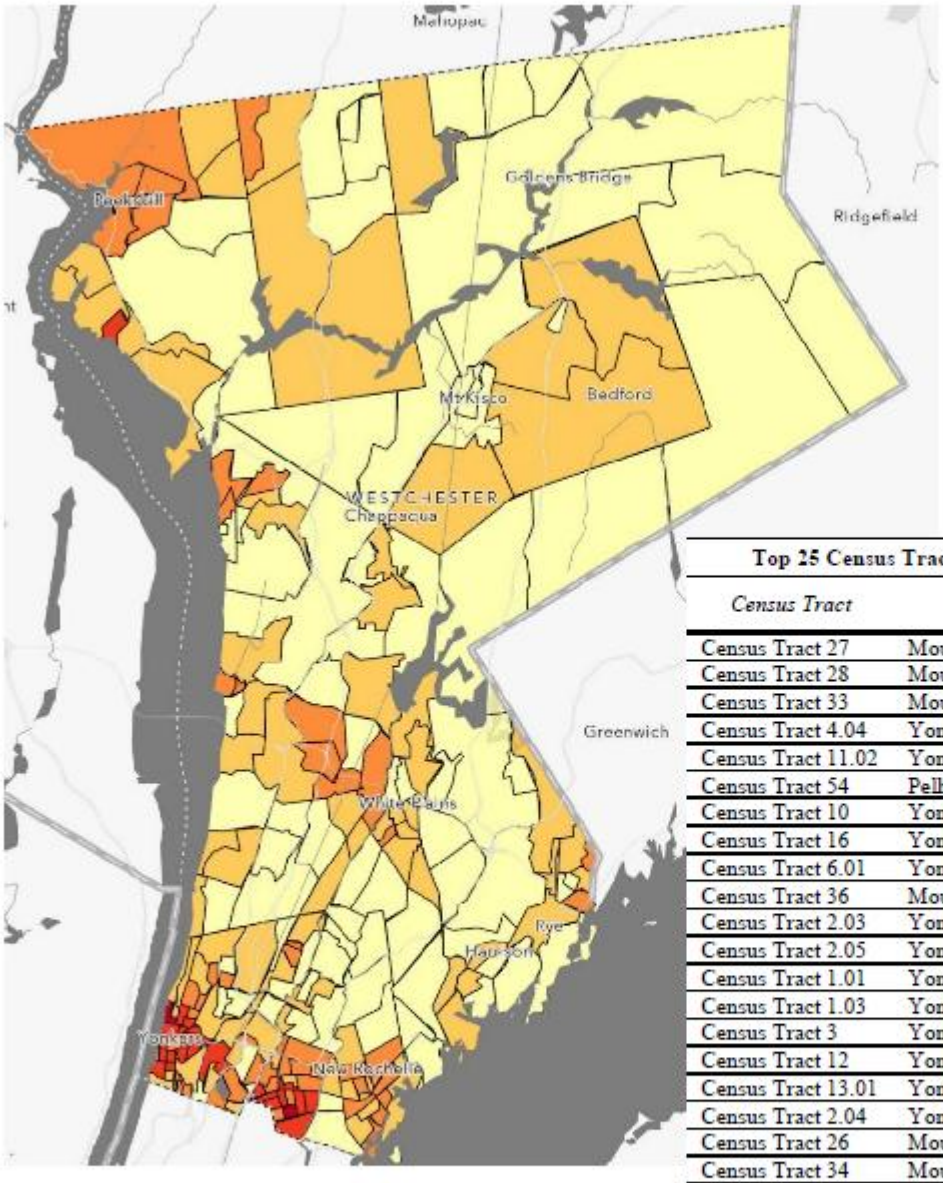

**Census Tracts Having a Predominant Living Arrangement Other Than Married-Couple Households**

| *Census Tract* | *Place* | *Pop < 18 in Households* | *% in Married-Couple HHs* | *% in Cohabiting Couple HHs* | *% in Male HHr, No Spouse/ Partner HHs* | *% in Female HHr, No Spouse/ Partner HHs* |
|---|---|---|---|---|---|---|
| C.T. 1.03 | Yonkers | 1407 | 35.7 | 0 | 15.4 | 48.9 |
| C.T. 8.03 | Yonkers | 1403 | 45.8 | 4.6 | 0.9 | 48.8 |
| C.T. 4.01 | Yonkers | 1067 | 20.6 | 0 | 21 | 58.4 |
| C.T. 109.03 | Greenburgh | 1046 | 41.6 | 1.2 | 13.5 | 43.7 |
| C.T. 1.01 | Yonkers | 987 | 29.5 | 0 | 15.1 | 55.4 |
| C.T. 3 | Yonkers | 963 | 21.3 | 18 | 13.3 | 47.5 |
| C.T. 27 | Mount Vernon | 963 | 25.2 | 4.4 | 4.6 | 65.8 |
| C.T. 26 | Mount Vernon | 934 | 44 | 8.9 | 0 | 47.1 |
| C.T. 40.01 | Mount Vernon | 862 | 45.2 | 0 | 0 | 54.8 |
| C.T. 29 | Mount Vernon | 830 | 35.2 | 4.1 | 4.2 | 56.5 |
| C.T. 13.05 | Yonkers | 806 | 32.5 | 12.3 | 8.2 | 47 |
| C.T. 31 | Mount Vernon | 781 | 33.7 | 0 | 12.7 | 53.6 |
| C.T. 34 | Mount Vernon | 723 | 31.1 | 0 | 4.4 | 64.5 |
| C.T. 4.03 | Yonkers | 693 | 12.4 | 44.6 | 3.5 | 39.5 |
| C.T. 10 | Yonkers | 578 | 25.1 | 36.5 | 0 | 38.4 |
| C.T. 37 | Mount Vernon | 547 | 38 | 7.9 | 9.9 | 44.2 |
| C.T. 57.04 | New Rochelle | 470 | 46.2 | 0 | 0 | 53.8 |
| C.T. 30 | Mount Vernon | 419 | 37.2 | 12.4 | 0 | 50.4 |
| C.T. 35 | Mount Vernon | 413 | 33.9 | 0 | 5.8 | 60.3 |
| C.T. 5.02 | Yonkers | 391 | 4.6 | 12 | 0 | 83.4 |
| C.T. 15.03 | Yonkers | 371 | 33.4 | 1.3 | 18.1 | 47.2 |
| C.T. 9840 | Cortlandt | 30 | 0 | 0 | 0 | 100 |

*Sources: 2016-2020 U.S. Census American Community Survey, Table B09008; ESRI*

*Note: Population totals exclude Householders, Spouses, and Unmarried Partners*

Figure 22: Predominant Living Arrangements of Children, Westchester County




**Top 25 Census Tracts by Percentage of Total Households**

| *Census Tract* | *Place* | *2020 Pop Female HHr* | *% Total Family HHs* |
|---|---|---|---|
| Census Tract 27 | Mount Vernon | 2180 | 54.23 |
| Census Tract 28 | Mount Vernon | 2180 | 54.23 |
| Census Tract 33 | Mount Vernon | 2180 | 54.23 |
| Census Tract 4.04 | Yonkers | 1702 | 53.37 |
| Census Tract 11.02 | Yonkers | 872 | 44.76 |
| Census Tract 54 | Pelham | 1935 | 44.72 |
| Census Tract 10 | Yonkers | 1290 | 42.03 |
| Census Tract 16 | Yonkers | 1290 | 42.03 |
| Census Tract 6.01 | Yonkers | 1290 | 42.03 |
| Census Tract 36 | Mount Vernon | 954 | 40.51 |
| Census Tract 2.03 | Yonkers | 1814 | 40.33 |
| Census Tract 2.05 | Yonkers | 1814 | 40.33 |
| Census Tract 1.01 | Yonkers | 1570 | 39.31 |
| Census Tract 1.03 | Yonkers | 1570 | 39.31 |
| Census Tract 3 | Yonkers | 1570 | 39.31 |
| Census Tract 12 | Yonkers | 1570 | 39.31 |
| Census Tract 13.01 | Yonkers | 1570 | 39.31 |
| Census Tract 2.04 | Yonkers | 1570 | 39.31 |
| Census Tract 26 | Mount Vernon | 1675 | 39.25 |
| Census Tract 34 | Mount Vernon | 1675 | 39.25 |
| Census Tract 55 | Pelham Manor | 1675 | 39.25 |
| Census Tract 41 | Mount Vernon | 1178 | 38.97 |
| Census Tract 32 | Mount Vernon | 1182 | 37.91 |
| Census Tract 4.03 | Yonkers | 1502 | 36.25 |
| Census Tract 5.01 | Yonkers | 1502 | 36.25 |
| Census Tract 5.02 | Yonkers | 1502 | 36.25 |
| Census Tract 6.02 | Yonkers | 1502 | 36.25 |

*Sources: 2020 U.S. Census, Table P0180006; ESRI*

Figure 23: The Population of Female Householders without Spouse in Westchester County

As stated previously in this section when considering identified R/ECAP Census tracts, the disaster-declared counties overall, and Westchester County specifically, are high income communities. The median and per capita incomes of the entire disaster-declared region and the HUD-identified MID are greater than the New York State median and per capita incomes. As

illustrated in Figure 24 and Figure 25, there are very few census tracts having a majority of the population with incomes at or below eighty percent (80%) of Area Median Income (AMI).

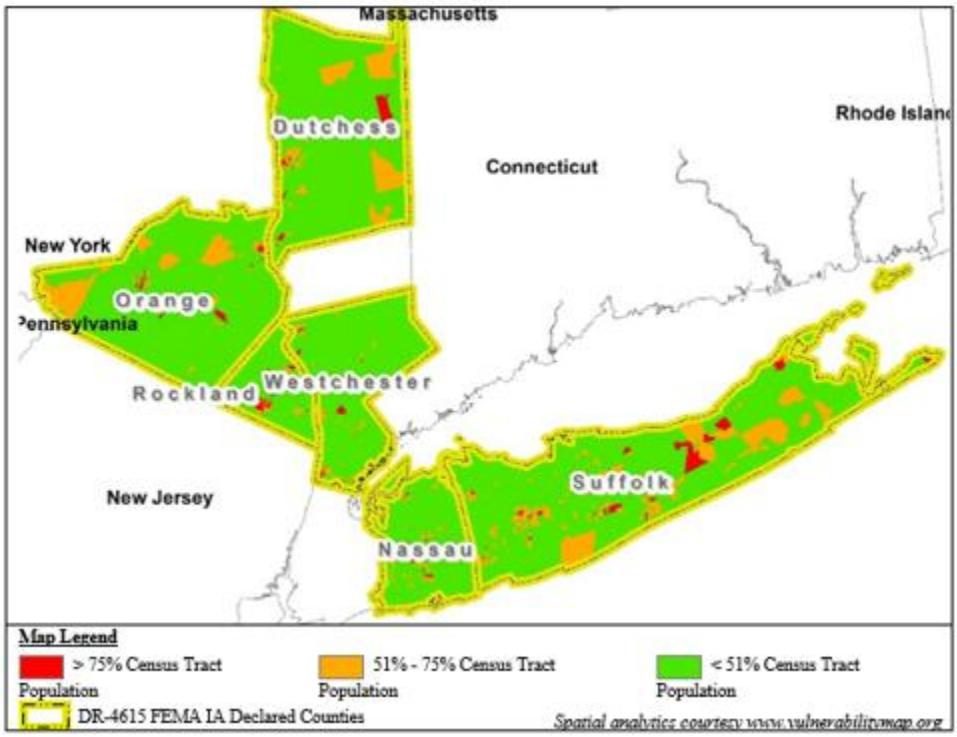



Figure 24: Percent of population classified as low- to moderate-income (LMI) in Hurricane Ida's New York State CDBG-DR allocation impact area.

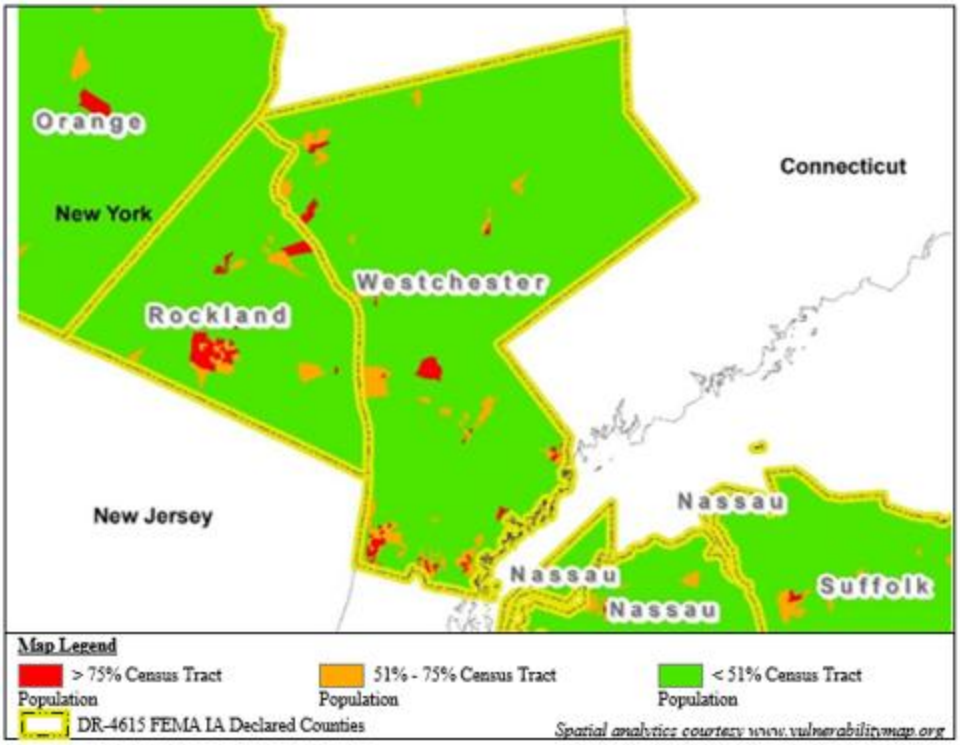



Figure 25: Percent of Population Classified as low- to moderate-income (LMI) in Westchester County

Despite the income distribution across the entire disaster impact area, the same communities first identified as experiencing greatest storm impacts and subsequently shown to have high concentrations of minorities, immigrants, and female households without a spouse, are again the same communities within Westchester County having the greatest percentage of low- to moderate-income persons (Table 20).

Table 20: Low- and Moderate-Income population by “Census Places” in Westchester County

| Municipality/Census Designated Place (CDP) | LMI Population (Low and Moderate) | % LMI |
|---|---|---|
| Fairview CDP | 1,800 | 62.8 |
| **Port Chester village** | **17,240** | **59.1** |
| Sleepy Hollow village | 5,715 | 57.2 |
| Ossining village | 13,245 | 56.6 |
| Peekskill city | 13,250 | 55.8 |
| **Mount Vernon city** | **37,155** | **55.1** |
| Crugers CDP | 850 | 54.8 |
| Bedford Hills CDP | 1,745 | 53.8 |
| Verplanck CDP | 845 | 51.1 |
| **Yonkers city** | **96,850** | **49.3** |
| Mount Kisco village | 4,945 | 45.0 |
| Scotts Corners CDP | 240 | 43.6 |
| **New Rochelle city** | **31,535** | **41.6** |
| **White Plains city** | **22,690** | **40.3** |
| Tuckahoe village | 2,455 | 37.5 |
| Elmsford village | 1,775 | 37.3 |
| Mamaroneck village | 6,785 | 36.0 |
| Heritage Hills CDP | 1,305 | 32.8 |
| Tarrytown village | 3,415 | 31.0 |
| Montrose CDP | 810 | 30.5 |
| Harrison village | 6,915 | 28.9 |
| Hartsdale CDP | 1,450 | 28.7 |
| Lake Mohegan CDP | 1,380 | 25.4 |
| Katonah CDP | 550 | 25.2 |
| Shrub Oak CDP | 480 | 24.1 |
| Dobbs Ferry village | 2,355 | 23.7 |
| Croton-on-Hudson village | 1,890 | 23.6 |
| Eastchester CDP | 4,685 | 23.6 |
| Hawthorne CDP | 1,055 | 23.1 |
| Chappaqua CDP | 285 | 22.2 |
| Jefferson Valley-Yorktown CDP | 3,095 | 20.8 |
| Buchanan village | 450 | 20.4 |
| Rye Brook village | 1,875 | 20.0 |
| Yorktown Heights CDP | 390 | 20.0 |
| Pleasantville village | 1,335 | 19.7 |
| Thornwood CDP | 785 | 19.7 |
| Valhalla CDP | 645 | 19.3 |
| Hastings-on-Hudson village | 1,440 | 19.1 |
| Pelham village | 1,325 | 19.0 |
| Irvington village | 1,175 | 18.2 |
| Crompond CDP | 385 | 16.9 |
| Rye city | 2,600 | 16.5 |
| Shenorock CDP | 305 | 16.3 |
| Golden's Bridge CDP | 230 | 13.6 |
| Briarcliff Manor village | 915 | 12.9 |
| Armonk CDP | 580 | 12.8 |
| Lincolndale CDP | 185 | 12.1 |
| Ardsley village | 530 | 11.7 |
| Bronxville village | 615 | 10.0 |
| Larchmont village | 580 | 9.7 |
| Greenville CDP | 680 | 9.2 |
| Bedford CDP | 175 | 8.6 |
| Scarsdale village | 1,390 | 7.9 |
| Pelham Manor village | 340 | 6.1 |

*Source: https://www.hudexchange.info/programs/acs-low-mod-summary-data/*

Outside of Westchester County, Table 21lists units of local government whose population is more than 50% low- to moderate-income persons. Despite the income vulnerability of these

areas outside the HUD-identified MID, the majority, with the exception of Glen Cove in Nassau County, are well outside of the geography that experienced the greatest impacts from Hurricane Ida.

Table 21: Units of Local Government in the State MID Counties with a Majority of Low- to Moderate-Income Persons

| Municipality | LMI Population (Low and Moderate) | % LMI |
|---|---|---|
| Newburgh city, Orange County | 20,235 | 73.6 |
| Poospatuck Reservation, Suffolk County | 295 | 68.6 |
| Poughkeepsie city, Dutchess County | 19,680 | 66.2 |
| Port Jervis city, Orange County | 5,515 | 64.1 |
| Middletown city, Orange County | 16,025 | 58.5 |
| Deerpark town, Orange County | 4,525 | 58.0 |
| Ramapo town, Rockland County | 72,230 | 55.8 |
| Monroe town, Orange County | 23,190 | 55. 8 |
| North East town, Dutchess County | 1,610 | 54.1 |
| Dover town, Dutchess County | 4,380 | 51.5 |
| Glen Cove city, Nassau County | 13,270 | 50.1 |

*Source: https://www.hudexchange.info/programs/acs-low-mod-summary-data/*

Continuing this exercise of layering vulnerability indicators, RHC has incorporated the Social Vulnerability Index (SoVI) from the University of Central Florida as an additional component of its social equity, fair housing, and civil rights analysis. SoVI uses the most recent U.S. Census data (2016-2020) to measure the social vulnerability of all census tracts with population in the disaster-declared area of interest for Hurricane Ida. The index is a comparative metric facilitating examination of differences in social vulnerability across census tracts, the building blocks of counties. SoVI uses twenty-seven (27) socioeconomic variables drawn from the U.S. Census Bureau's five-year American Community Survey (ACS) estimates that are grouped into 6 categories, providing a comprehensive and innovative approach to demonstrating a community's vulnerability to disasters as well as their ability to recover from them. Variables included in the SoVI index which also address the demographics of Federally protected classes under the Fair Housing Act include age, race, national origin, and familial status. The composite picture of the SoVI analysis for the disaster-declared counties outside of the HUD-identified MID mimics the criteria by criteria analysis discussed here for Westchester County. Census tracts in the other counties having a high social vulnerability score exhibit the same multiplication of concentration of vulnerabilities related to race, ethnicity, language, and familial status that have been shown to exist in Yonkers, Mount Vernon, and New Rochelle.

Using this data helps graphically illustrate the variation in social vulnerability across the disaster-declared counties; showing where there is uneven capacity for preparedness and response and pinpointing where resources might be used most effectively to reduce pre-existing vulnerability and encourage recovery. Utilizing social vulnerability is also useful as an indicator in determining the differential recovery from disasters. Recognizing that impoverished and

otherwise marginalized populations (those with higher social vulnerability) will have a harder time recovering from disasters like Hurricane Ida, it is important to assess the impact data through a social justice lens. In this context, vulnerability represents the potential for loss or harm among individuals and communities facing hazards and disasters(30). Determining what supplies, equipment, and personnel are needed to respond effectively in emergency situations requires sound knowledge of a region's social, economic, and baseline health conditions(31).

Here, the social vulnerability index (SoVI) provides a replicable, science-based, and a-political approach to understanding where the populations least able to prepare for, respond to, and rebound from disasters live. Figure 26 provides a visual of social vulnerability (2020) across the disaster-declared counties(32). Here, a different pattern begins to emerge where more socially vulnerable census tracts appear along the South Shore and eastern areas of Suffolk County in addition to northern Orange and Dutchess County.  People living in areas defined as having high SoVI would likely fall into the HUD category of "most distressed" because they are so susceptible to shocks such as major disasters and will have difficulty recovering without significant support if they are negatively impacted by an event such as Hurricane Ida.

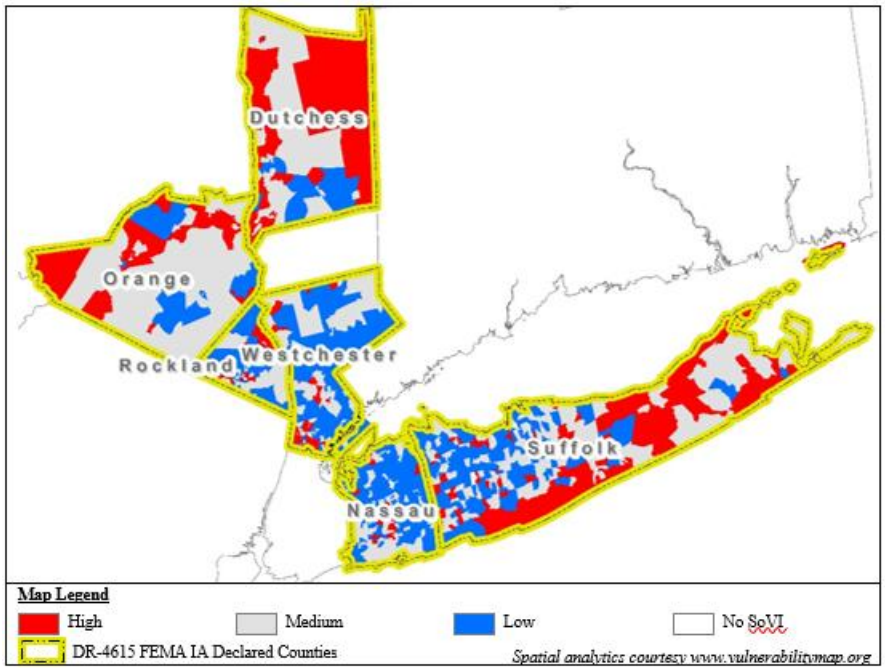



Figure 26: Social Vulnerability Index (SoVI) levels by Census Tract for New York State's Hurricane Ida Area of Interest

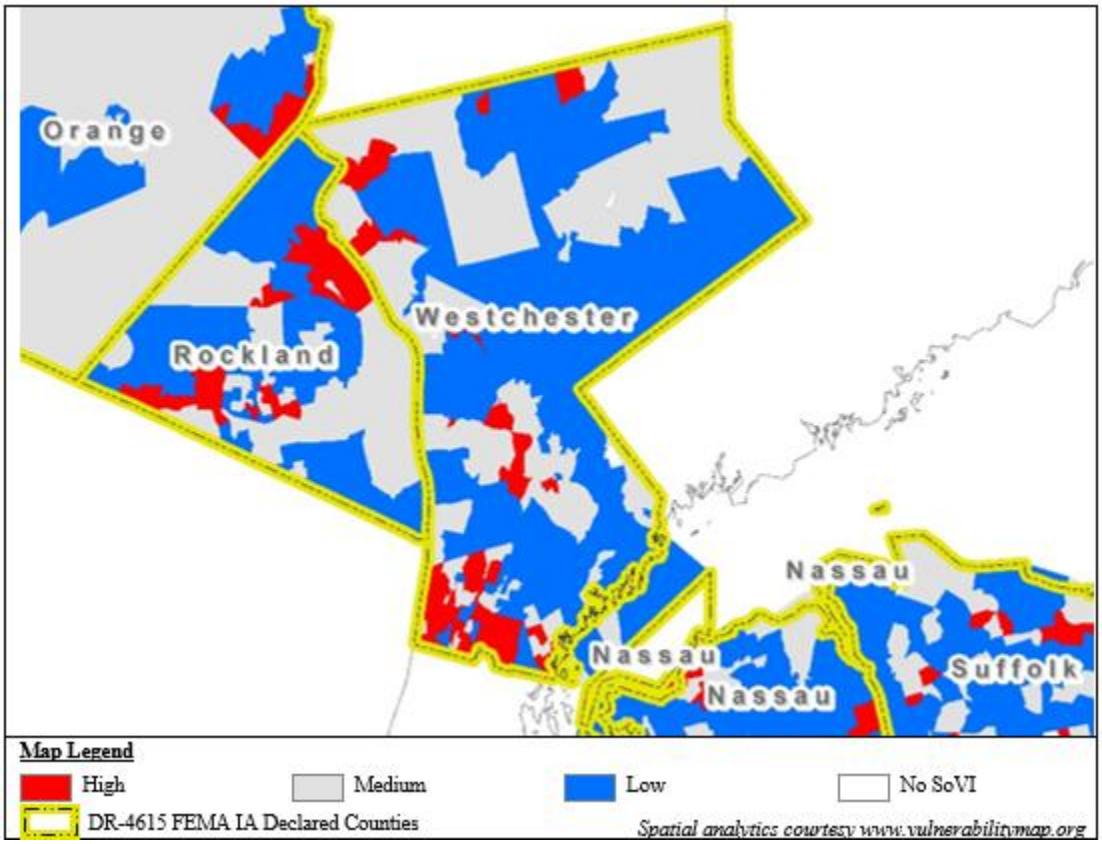



Figure 27: Social Vulnerability Index (SoVI) levels by Census Tract in Westchester County.

Using the SoVI data captured in Figure 27 for Westchester County alone reinforces the concentrations of individual vulnerabilities discussed above within the areas understood to have experienced the greatest disaster impact. For example, areas with high social vulnerability in the HUD-identified MID of Westchester County such as Mount Vernon, New Rochelle, White Plains, and Yonkers all have higher percentages of renter-occupied units than the total percentage of renter-occupied units across the disaster-declared counties.

The Programs identified in this Action Plan are expected to Affirmatively Further Fair Housing, including by protecting current Affordable and Public Housing stock from future hazards, and addressing barriers for impacted low- and moderate- income renters ~~from protected classes~~ to remain or return to their communities in suitable housing. RHC's Programs are designed to protect Public and Affordable housing, secure suitable housing for impacted renters, and address unmet housing repair needs for low- and moderate-income homeowners~~,~~ and are therefore also expected to benefit the vulnerable populations and protected classes discussed in this section.

As discussed further specific to each individual Program, RHC has assessed that other sources of disaster recovery and traditional program designs would likely result in a loss of income and demographic diversity across the impacted counties due to barriers experienced by renters and low-income homeowners whose primary asset is their home.~~,~~ As discussed throughout this Unmet Need Analysis, such issues include difficulty meeting eligibility requirements for SBA loans for homeowners and the national studies highlighting challenges in renter recovery from

disasters. ~~The~~ Cehallenges facing renters are especially pertinent to RHC's Program design due to the high concentration of renters versus homeowners residing in the designated disadvantaged census tracts with high levels of minorities, female headed households, and other markers of social vulnerability in southern Westchester County.

The Programs outlined~~described~~ in this Action Plan are designed to directly respond to RHC's analysis of impediments individuals may encounter when attempting to access assistance ~~of the potential for unjustified discriminatory effects by~~. By injecting recovery funds into the communities and housing stocks most often overlooked or excluded from other recovery efforts the Programs address the obstacles to assistance for these communities. Given this analysis and RHC's efforts to ensure program design and funding avoid ~~similar~~ unjustified discriminatory effects in its Ida recovery efforts, RHC does not expect unjustified discriminatory effects from its program designs. ~~However, potential unintended discriminatory effects could surface, for example, in an undersubscription of LMI, protected classes and/or minority applicants to recovery programs, which could result in the recovery needs of vulnerable populations not being met by RHC's recovery programs.~~ RHC is committed to monitoring self-reported demographics associated with Program inquiries and applications to ensure Program funds are reaching a broadly diverse clientele as intended. RHC additionally accounted for~~considered~~ discriminatory effects when establishing the relative budgets of the proposed Programs. RHC therefore prioritized ~~is devoting the largest share of~~ grant funds in programs~~to~~ benefiting renters and incentivizing renters to secure suitable housing while remaining within the impacted communities~~-~~ until the communities' needs were met. The Programs~~in response to an identified risk that barriers to other sources of recovery assistance~~ are designed ~~leading~~ to assist renters that are~~being~~ unable to safely recover within their storm-impacted communities and are unable to access other recovery assistance due to identified barriers. By offering financial incentive to renters to remain in the impacted communities, RHC promotes the general welfare of these renters and is directly combatting the discriminatory impacts of homeowner-focused funding that have been observed to result in communities that are wealthier~~, whiter,~~ and having fewer low- to moderate- income occupants~~tenant occupants~~.

RHC specifically sought information on barriers to accessing disaster assistance from community-based organizations and other stakeholders in the development of this plan. The most commonly reported barriers include:

- Documentation requirements;
- A reliance on web-based applications and intake systems;
- Community suspicion of government; and
- Language

Lessons learned from prior disaster recovery Programs also highlight individual and community capacity as a barrier to successfully completing self-managed projects in compliance with grant requirements and timelines.

In response to these identified barriers, Program design and outreach efforts include, but are not limited to:

- Adopting a Language Access Plan Plan (LAP) that recognizes available data sources may not be capable of fully identifying the language needs of all disaster impacted groups. RHC's LAP for this grant incorporates ongoing monitoring of translation requests received with the intent of continuing to identify the language needs of impacted communities and offer vital Program documents in their primary language. As discussed in the "Citizen Participation" section of this Action Plan, substantial amendments and other programmatic material, including program applications and policy manuals for applicant-based programs, will be translated and made available in Spanish. Summaries of vital information and changes contained in the Action Plan and substantial amendments, as well as information on the public hearings, how to submit public comments, and how to request interpretation and/or translation, will be made available in Portuguese, Italian, Chinese, French Creole, Persian, Yiddish, Russian, Polish, Arabic, French and Tagalog. Notice of the availability of language assistance in these languages will be included in vital applicant-based Program outreach and application materials. For Public Hearings, RHC outreach materials note the process to request interpretation and auxiliary aids, including but not limited to a sign language interpreter, or special assistance. In certain cases, such as the in-person Action Plan Public Hearing held on September 8, 2022, RHC provides Spanish language simultaneous interpretation without having received a request.. In addition to providing accessibility for persons with disabilities, HCR's website includes translation function in over a dozen languages to support meaningful access by Limited English Proficiency (LEP) persons in their preferred language. The translation function can be accessed on every page of the website. All vital documents are available on the website in English as well as in translation per the LEP policy.

- Improving website accessibility features coupled with coordination with community-based organizations on initial Action Plan public hearings and program outreach and announcement to ensure people with disabilities and those without internet access or computer capabilities are informed and able to provide feedback and access Program assistance. Partnerships with community-based organizations include application submission and intake support as needed to meet Program objectives. RHC's outreach, construction standards and program design will seek to address barriers to participation and recovery faced by individuals with disabilities. As a State entity, RHC's public website is subject to the standards of New York State Information Technology Policy NYS-P08-005: Accessibility of Information Communication Technology. This policy is based on Section 508 of the Rehabilitation Act of 1973, as amended, and the Web Content Accessibility Guidelines ("WCAG") 2.0 A and AA standards. The WCAG standards support web content that is more accessible to people with disabilities by providing testable success criteria organized under four principles: perceivable, operable, understandable, and robust. New York State Office of Information Technology Services has established a goal of 90% compliance for all State websites, greater than the industry standard of 84.7%. RHC includes an accessibility statement along with a link to the NYS-P08-005 policy document on the website. 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 Rehabilitation Act and/or the Americans with Disabilities Act. Program guidelines will further describe accessibility requirements. Installation of and/or repair to reasonable accommodations are included in the repair scope for all applicants in the Ida Homeowner Repair and Reimbursement program having at least one full-time household member with a documented disability and may result in an award that exceeds the maximum amount of assistance. For the Renters Safe Housing Initiative, permanent housing must also include reasonable accommodations in the event at least one full-time household member has a documented disability. Households with accessibility needs may exceed the maximum incentive to allow for reasonable accommodation.

- To ensure trust is built between residents and the State, RHC and its subrecipients will actively seek guidance and support on marketing, outreach, and application rollout via partnerships with community-based organizations that primarily serve the Program's target demographic (low-to-moderate income residents, households with limited English proficiency, etc.). These partnerships will provide input for and public validation of the Programs to address the identified barrier of community suspicion of government. As discussed below in the "Citizen Participation" section of this Action Plan, RHC engaged a wide variety of community organizations and government entities as part of its efforts to identify unmet needs, including organizations focused on serving or advocating for specific protected classes, such as the Center for Aging in Place and Westchester Disabled on the Move; organizations focused on the needs of specific racial, ethnic and/or linguistic minorities, such as La Fuerza Unida and the Long Island African American Chamber of Commerce; faith groups such as Don Bosco Workers; and organizations and governmental entities focused on civil rights, economic opportunity and fair housing, such as the Westchester Housing Action Council and the Urban League of Westchester County. Outreach and application partnerships are subject to timeline, budget and other considerations and may range from requests to share outreach and application materials with individuals and communities served by the community-based organizations, to review and feedback on marketing and application materials, to providing funding for design and/or implementation of components of different Programs or locations' marketing, outreach and application efforts. For the RSHI program, RHC selects subrecipients and/or contractors for program implementation, including outreach, intake, application support, language access and rental counseling efforts for the program. In addition, for the IHRR program, RHC selects non-profit housing developers as subrecipients to manage implementation of the Program. For any organization selected as a subrecipient, RHC will work with the entity to ensure clear guidelines, including recordkeeping requirements, are in place and technical assistance is available. Subrecipient performance and feedback will be included in the monitoring efforts, discussed below, to ensure outreach and application efforts are reaching the intended audiences. Outreach efforts will seek to provide information clearly, articulate that all are welcome to apply, be culturally and demographically sensitive, and utilize various media and outreach strategies (social media, ads in culturally or demographically appropriate paid media, etc.). Outreach efforts for RHC's applicant-based Programs are expected to begin after HUD approval of the Action Plan, ahead of anticipated application rollout, in an effort to ensure information about the programs reaches as wide an audience as possible, ~~especially~~ including in vulnerable communities and protected classes. RHC's

approach to program outreach and marketing, including its partnership with a variety of community-based organizations, seeks to address identified impediments individuals face to access assistance ~~barriers to participation in programs such as lack of trust in government and language barriers which have led to historic underrepresentation of vulnerable groups in previous disaster recovery efforts.~~

- Similarly, the design and implementation of the application process for applicant-based programs will seek to address identified barriers to participation for vulnerable persons and those in protected classes. RHC and/or its subrecipients will leverage feedback from community-based organization partners to ensure application materials and eligibility information is comprehensible, culturally sensitive and compliant with RHC's Language Access Plan. Subject to budgeting and personnel considerations, RHC and/or its subrecipients will seek to obtain culturally competent and language appropriate services as needs are identified. RHC and/or its subrecipients will offer both online and in-person application submission options, and, subject to budget and timeline considerations, RHC and/or its subrecipients will explore offering flexibility in application and intake processes, such as application drop-off points in community spaces, in-person or over the phone application assistance, and language assistance and translation to provide equitable opportunities to apply that address barriers and limitations various disadvantaged groups may face. ~~To address the identified barrier of documentation requirements RHC is committed to streamlining and minimizing applicant documentation burdens where possible, especially for renters and mixed-status households. The state will engage with the Community Resource Center and other community organizations, as discussed above, to identify opportunities to improve application accessibility and intake documentation requirements.~~ For disaster victims the documentation required to comply with program requirements is often not readily available. RHC and its subrecipients will incorporate ownership and occupancy documentation flexibility offered by FEMA into Program policies and procedures to limit barriers to participation tied to missing documents, such as allowing recent major-repairs receipts as ownership documentation, or utility bills for occupancy. Similarly, verifiable self-certification of income may be allowed when applicants cannot provide other income documentation. In addition, RHC and its subrecipients are committed to working with all applicants on a case-by-case basis to understand and address all
documentation or eligibility barriers. As the programs are built out and new challenges are identified, remedies to overcome barriers will be further developed in the policies and procedures of each program.
- ~~As discussed elsewhere in this Action Plan, RHC and its subrecipients will prioritize processing of applications to ensure unmet needs of the most vulnerable communities are addressed. For example,~~ In the Ida Homeowner Repair and Reimbursement and Renters Safe Housing Initiative Programs, LMI applicants will be prioritized. When~~,~~ all LMI applications have been exhausted, non-LMI applications may be considered in consultation with HTFC and in furtherance of the Action Plan.~~followed by non-LMI applicants who are considered vulnerable or historically disadvantaged members of protected classes, including, but not limited to: families with children under the age of 18, elderly households, disabled households, veteran populations, hardship cases, LEP individuals, immigrants, Single Female heads of household, LGBTQ+ individuals, and historically disadvantaged members of protected classes including race, color, national~~

~~origin, religion, sex, and familial status.~~ For IHRR, LMI applicants will be prioritized, followed by non-LMI applicants below 120% AMI ~~who are members of vulnerable or historically disadvantaged groups, on a first come, first served basis~~. IHRR Applicants above 120% AMI and up to 160% AMI ~~who are members of these groups may be served~~, from lowest to highest income, if funds remain available, subject to the Overall Benefit requirement to spend 70% of grant funds to benefit LMI persons. RHC's ~~subrecipient and developer project-based~~ programs will also prioritize LMI and vulnerable communities, with part of the scoring criteria focused on the project's benefit to LMI communities and prioritization of housing and services in support of vulnerable communities. To ensure that vulnerable persons and protected classes are not facing barriers to applying, RHC and/or its subrecipients will monitor application submissions' demographics and geography data throughout the Program application period, and compare these indicators to the demographics and locations of storm-impacted communities identified though the Unmet Needs assessment, with a special focus on vulnerable and/or protected classes. RHC and its subrecipients may modify its outreach efforts or extend application deadlines if known eligible vulnerable and impacted communities are underrepresented as identified by discrepancies between expected and actual applicants through monitoring, or from feedback from community-based organization partners or applicants.

- Program design prioritizes housing, housing security, and long-term resiliency for LMI communities impacted by Ida ~~for vulnerable populations~~. RHC aims to make other resources
  that will promote long-term recovery ~~for vulnerable populations~~ for these communities ~~available~~. RHC and/or subrecipients will provide applicants, especially any who may be at immediate risk of their home, with information and resources made available through HUD's Office of Housing Counseling, including a list of HUD-approved Housing Counseling Agencies that may be able to provide foreclosure prevention assistance and other informational flyers on subjects such as making consumers aware of scams, and preparing for future disasters. These resources will be made available to participants in both the Renters Safe Housing Incentive Program and the Ida Homeowner Repair and Reimbursement Program. Housing Counseling agencies are valuable partners that aid ~~vulnerable~~ Low and Moderate Income and other disaster-impacted populations in their long-term recovery and resilience, and have the technical expertise to assist in participants' long-term recovery and stability.
- RHC is committed to continue addressing barriers to participation throughout the lifecycle of its Programs, including by continued engagement with applicants, including vulnerable and protected class applicants, and community organizations serving them. For example, RHC will provide opportunities for community input into new programs by hosting a virtual public hearing for Action Plan Amendments that propose a new Program. For the Ida Homeowner Repair and Reimbursement Program, Applicants competitively select a Construction Contractor to undertake the work. After selecting a contractor, the Program vets the selected contractor and Applicants sign a Contract with the contractor which includes Program clauses allowing for Program oversight of construction, and Program disbursement of payments to the contractor, and required contractor warranties, to address the identified barrier of insufficient capacity and familiarity in dealing with contractors. In addition, RHC will provide various forms of

planning and technical assistance to subrecipient and Program partner entities to address capacity gaps. For the Renters Safe Housing Initiative, the program is designed~~seeks~~ to address participation and recovery barriers for all eligible applicants, including vulnerable and disadvantaged applicants. In addition, RHC and its subrecipients will consider, subject to budget, timeline and other considerations, the following strategies to continued engagement with LMI populations including ~~with~~ vulnerable groups and community organizations to ensure later stages of the Program continue to address potential barriers: develop surveys of applicants to identify challenges faced in completing applications and receiving program benefits; monitoring post-application drop offs of applicants to ~~identify disproportionate impact on vulnerable groups and protected classes and~~ identify common challenges by different groups of applicants leading to these drop-offs; and continuing engagement with partner community organizations on new program designs and successes and challenges encountered in the programs.

~~In these ways~~Through these strategies and approaches, RHC strives~~seeks~~ to address the needs of the identified communities, including ~~vulnerable populations and~~ protected classes, analyzed in this section, and avoid potential impediments and barriers individuals could face in accessing assistance~~any unintended discriminatory effect~~. Should~~In the event~~ RHC identify~~ies~~ any additional barriers that may limit equitable participation, RHC may take reasonable ~~measures~~ steps to increase ~~coordination, communication, affirmative~~ marketing, ~~targeted~~ outreach, and engagement with underserved communities and potential applicants ~~individuals~~, including persons with disabilities ~~and persons with LEP~~.

**Grantee Demographics and Disaster Impacted Populations**

| Demographic | Area-Wide Estimates | Area-Wide Percent | Disaster Declaration Estimate | Disaster Declaration Percent | MID Estimates | MID Percent |
|---|---|---|---|---|---|---|
| Total Population | 19,835,913.00 | 100.00% | 3,958,115.00 | 19.95% | 997,895.00 | 25.21% |
| Under 5 years | 1,150,483.00 | 5.80% | 227,509.00 | 19.78% | 54,884.00 | 24.12% |
| 65 years and over | 3,352,269.00 | 16.90% | 682,764.00 | 20.37% | 173,634.00 | 25.43% |
| Population with a Disability | 1,507,529.00 | 7.60% | 232,316.00 | 15.41% | 57,878.00 | 24.91% |
| White or Caucasian | 13,805,795.00 | 69.60% | 3,133,837.00 | 22.70% | 730,459.00 | 23.31% |
| Black or African American | 3,491,121.00 | 17.60% | 450,314.00 | 12.90% | 166,648.00 | 37.01% |

| Demographic | Area-Wide Estimates | Area-Wide Percent | Disaster Declaration Estimate | Disaster Declaration Percent | MID Estimates | MID Percent |
|---|---|---|---|---|---|---|
| American Indian and Alaska Native | 198,359.00 | 1.00% | 23,274.00 | 11.73% | 9,979.00 | 42.88% |
| Asian | 1,785,232.00 | 9.00% | 259,876.00 | 14.56% | 64,863.00 | 24.96% |
| Native Hawaiian and Other Pacific Islander | 19,836.00 | 0.10% | 3,958.00 | 19.95% | 998.00 | 25.21% |
| Other | 535,570.00 | 2.70% | 86,856.00 | 16.22% | 24,947.00 | 28.72% |

Data Source(s): US Census Bureau, QuickFacts, V2021. Accessed from https://www.census.gov/quickfacts/fact/table/US/PST045221.

**Income Demographics**

| Income/Economic Demographics | Statewide | Areas Impacted by Disaster | HUD MIDs |
|---|---|---|---|
| Median Household Income | $71,117.00 | $96,579.00 | $99,489.00 |
| Per Capita Income | $40,898.00 | $43,535.00 | $57,953.00 |

Data Source(s): FY 2021 Income Limits | HUD USER

**Income Demographics - Low Income**

| Income/Economic Demographics | Statewide | Areas Impacted by Disaster | HUD MIDs |
|---|---|---|---|
| Income in the past 12 months below poverty level | 2,581,048.00 | 279,597.00 | 79,242.00 |

Data Source(s): LMISD by Block Group, Based on 2011-2015 ACS for the FY 2021 Entitlement CDBG Grantees - HUD Exchange

**LMI Analysis - Overall**

| Category | Total LMI Persons | Total Population | Percent LMI |
|---|---|---|---|
| Area wide | 9,059,353.00 | 19,093,360.00 | 47.45% |

Data Source(s): LMISD by Block Group, Based on 2011-2015 ACS 5-Year Estimates for the FY 2021 Entitlement CDBG Grantees - HUD Exchange

**LMI Analysis - Federally Declared Disaster Areas**

| County/Municipality | Non-MID-Total LMI Persons | Non-MID-Total Population | Non-MID-Percentage LMI | MID-Total LMI Persons | MID-Total Population | MID-Percentage LMI |
|---|---|---|---|---|---|---|
| Dutchess | 103,685.00 | 278,540.00 | 37.22% | 0.00 | 0.00 | 0.00% |
| Nassau | 428,169.00 | 1,334,170.00 | 32.09% | 0.00 | 0.00 | 0.00% |
| Orange | 148,175.00 | 363,725.00 | 40.74% | 0.00 | 0.00 | 0.00% |
| Rockland | 124,814.00 | 313,740.00 | 39.78% | 0.00 | 0.00 | 0.00% |
| Suffolk | 548,324.00 | 1,469,330.00 | 37.32% | 0.00 | 0.00 | 0.00% |
| Westchester | 0.00 | 0.00 | 0.00% | 335,360.00 | 940,270.00 | 35.67% |
| **Total** | **1,353,167.00** | **3,759,505.00** | **35.99%** | **335,360.00** | **940,270.00** | **35.67%** |

Data Source(s): Census Bureau Data ;LMISD by Block Group, Based on 2011-2015 ACS 5-Year Estimates for the FY 2021 Entitlement CDBG Grantees - HUD Exchange

**Manufactured Housing Units Impacted by Disaster**

| County/Municipality | Number of Units | % of Total Units in County/Municipality | Remaining Unmet Need |
|---|---|---|---|
| Dutchess | 7.00 | 0.00% | $0.00 |
| Nassau | 40.00 | 3.69% | $0.00 |
| Orange | 4.00 | 0.13% | $0.00 |
| Rockland | 8.00 | 0.68% | -$12,059.91 |
| Suffolk | 61.00 | 0.99% | $0.00 |
| Westchester | 16.00 | 1.96% | $0.00 |
| **Total** | **136.00** | **7.45%** | **-$12,059.91** |

Data Source(s): 2016-2020 American Community Survey 5-Year Estimates. Table B25024, “=Units in Structure.”

**Limited English Proficiency Breakdown of Disaster-Related Areas**

| County/Municipality | Estimate Speak English Less than 'Very Well' | Percent Speak English Less than 'Very Well' |
|---|---|---|
| Dutchess | 13,250.00 | 4.73% |

| County/Municipality | Estimate Speak English Less than 'Very Well' | Percent Speak English Less than 'Very Well' |
|---|---|---|
| Nassau | 140,977.00 | 11.00% |
| Orange | 34,646.00 | 9.71% |
| Rockland | 54,534.00 | 18.25% |
| Suffolk | 114,316.00 | 8.15% |
| Westchester | 117,706.00 | 12.87% |
| **Total** | **475,429.00** | |

Data Source(s): 2011-2015 American Community Survey 5-Year Estimates. Table S1601, "Language Spoken at Home."

**Point-in-Time Count - Type of Shelter**

| Geography | Emergency Shelter | Transitional Housing | Unsheltered Homeless | Total Known Homeless |
|---|---|---|---|---|
| Area wide | 81,342.00 | 5,297.00 | 4,557.00 | 91,271.00 |
| FEMA Declared | 5,436.00 | 997.00 | 286.00 | 6,745.00 |
| MID | 1,068.00 | 548.00 | 67.00 | 1,683.00 |

Data Source(s): 2021 AHAR: Part 1 - PIT Estimates of Homelessness in the U.S. | HUD USER; CoC Housing Inventory Count Reports - HUD Exchange

**b. Infrastructure Unmet Need.**

**Disaster Damage and Impacts - Infrastructure.** Despite significant investments in public infrastructure, especially in Nassau and Suffolk Counties in the almost ten (10) years since Superstorm Sandy, New York State continues to have some of the oldest municipal systems in the country. Heavy rains were known throughout the disaster-declared region to cause surface flooding and close roadways, in addition to backups into residential basements, before the extreme rain totals and hourly rates of Hurricane Ida.

One major issue is that localized communities have substandard sewer systems that are especially vulnerable to damages and being overwhelmed. Suffolk County is seventy-five percent (75%) unsewered, which has significant implications such as degradation of water quality. Another community of known concern is Mount Vernon, whose decaying water infrastructure system results in sewage backups into individual homes whenever it rains.

New York's transportation network is also under immense strain as half of New York's roads are in fair or poor condition as marked in the ASCE's 2021 report card. However, damage reports from Hurricane Ida do not include notable instances of roadways or bridges being washed out, but rather associated or nearby drainage systems being overwhelmed. Of particular concern within Westchester County are the Saw Mill River Parkway, the Bronx River Parkway, and the Hutchinson River Parkway, as these are major commuting routes for residents travelling between Westchester County, New York City, Connecticut, and points north. All three limited access parkways follow the path of river watersheds and were originally planned and constructed in the 1920's and 1930's. Community-wide planning to address regular flooding along the watersheds and of the parkways is a long-term need that was identified prior to Hurricane Ida.

To assess the specific infrastructure impacts from Hurricane Ida and remaining unmet need, RHC has analyzed the Open FEMA data for FEMA Public Assistance (PA) project awards outside of New York City. As of March 31, 2023, FEMA has authorized 563 PA projects state-wide totaling over $51 million, of which 439 with a total cost of over $32M are located outside New York City. The total estimated impact on infrastructure is approximately eighteen percent (18%) of the overall identified impact to the region from Hurricane Ida across all sectors.

In addition to FEMA PA awards speaking to the direct impacts of Hurricane Ida on public infrastructure, FEMA's Hazard Mitigation Grant Program (HMGP) has authorized $43,179,285 to New York State for infrastructure and public facility mitigation efforts in response to Hurricane Ida. While individual project review and evaluation is ongoing at the time of this Plan submission by the New York State Division of Homeland Security and Emergency Services (DHSES), given the distribution of PA projects between New York City and the surrounding declared counties, it can be projected that between seventy-five percent (75%) and eighty-five percent (85%) of the total authorization will support mitigation efforts in the disaster-declared counties outside of New York City. This will represent an additional $29M to $33M of federal funds being invested in the region's recovery, with local entities responsible for anywhere from $3M to $9M in matching and ineligible costs.

To address the unmet needs for Infrastructure discussed in this section, as well as additional mitigation needs for Infrastructure, RHC is creating the Resilient Investments through Support and Capital Program. As discussed in Program Details section of this Action Plan, the Resilient Investments through Support and Capital Program provides CDBG-DR funds to units of local government, public entities, or non-profit organizations in order to fully leverage other funding sources for the completion of resilient upgrades to public facilities and infrastructure, including disaster-related systems and other disaster-related community-based mitigation systems. To be eligible to receive CDBG-DR funds under this Program, proposed projects must increase resilience to disasters. RHC will leverage existing relationships and strive to create new

partnerships with other federal and State agencies, corporations, foundations, nonprofits, and other stakeholders as a means of utilizing all viable sources of funding.

The updated unmet needs analysis prepared as part of APA 1 identified an increase of $4.48 million in unmet infrastructure needs. As discussed above, while direct damage from Ida may have been relatively limited, the repair needs belie a broader need to upgrade and right-size the impacted areas infrastructure to mitigate the risk of these systems being overwhelmed by increasing hazards, including the unprecedented rainfall during Ida. Furthermore, consultation with impacted jurisdictions indicates a lack of capacity for these entities to access available funds for infrastructure mitigation given complex application processes. Therefore, the State is allocating an additional $8.01 million in funds made available under PL 117- 80 to its Resilient Investments through Support and Capital (RISC) Program, as well as reallocating $1.29 million in general planning funds to this program via APA 1.

As discussed in the Long-term Recovery Planning section of this Action Plan, this Plan also proposes the use of planning funds to support efforts by selected subrecipients to perform feasibility and engineering studies that can inform the design and funding of future community resiliency upgrades. RHC intends to provide technical assistance to support the selected subrecipients on leveraging additional funding and project design.

**Total Cost and Need by PA Category**

| PA Category | Estimated PA Cost | Local Match | Resiliency | Total Need (Match + Resiliency) |
|---|---|---|---|---|
| A - Debris | $5,764,916.52 | $0.00 | $0.00 | $0.00 |
| B - Emergency Measures | $5,535,562.89 | $0.00 | $0.00 | $0.00 |
| C - Roads and Bridges | $7,608,872.28 | $760,887.23 | $1,141,330.84 | $1,902,218.07 |
| D - Water Control Facilities | $1,922,721.41 | $192,272.14 | $288,401.21 | $480,680.35 |
| E - Building and Equipment | $6,063,955.72 | $606,395.57 | $909,593.36 | $1,515,988.93 |
| F - Utilities | $1,770,901.53 | $177,090.15 | $265,635.23 | $442,725.38 |
| G - Other | $3,829,265.69 | $382,926.57 | $574,389.85 | $957,316.42 |
| **Total** | **$32,496,196.04** | **$2,119,571.66** | **$3,179,350.49** | **$5,298,929.15** |

Data Source(s): External Stakeholder Interviews; Public Assistance Funded Projects Details – v1 FEMA.gov.

### c. Economic Revitalization Unmet Need.

**Disaster Damage and Impacts - Economic Revitalization.** The remnants of Hurricane Ida impacted some of the largest urban areas in the United States. Given the total region's size and density, there are various types of business entities from large, multi-national corporations and other Fortune 500 businesses to the small shops, restaurants, and service providers that support communities at a neighborhood level.

The Mid-Hudson Region, including the HUD-identified MID Westchester County, is recognized as one of the State's most vibrant business environments, having benefitted from over $700M in investments through the Regional Economic Development Council since 2011. The Mid-Hudson Region ranks second in New York State, behind New York City, in the number of Fortune 1000 company headquarters. Long Island also is home to diverse industries and has the most life sciences jobs of any region in the State while simultaneously continuing the region's 300-year history of farming, fishing, and raising poultry.

However, the overall economic strength of the region stemming from its population density and overall high levels of education and wealth, does not mean that individual businesses, and especially small businesses, were not already under strain at the time of Hurricane Ida. New York's response to COVID-19 involved some of the longest and most comprehensive shutdowns in the nation. Many businesses that rely on foot traffic and in-person transactions have adapted to new business models and taken advantage of eased regulations as well as government assistance to remain in business. Others have not been able to remain sufficiently profitable or simply decided that the time had come to cease operations.

A natural disaster like Hurricane Ida tends to impact the smaller business community most severely because of losses to physical property and inventory as well as disruptions in operations, either due to damages to the business' physical space or challenges accessing the business due to closed roadways and other means of transportation. This is supported by the U.S. Small Business Administration (SBA) business/EIDL loan data for the disaster-declared counties where over forty percent (40%) of the loan applicants are individual/sole proprietor entities. Table 22 breaks down the business entities seeking assistance from SBA following Hurricane Ida by organization type and loan status. This data indicates impacted business were primarily small, but also largely could not qualify for assistance from SBA or found the terms too onerous or

otherwise not suited to their needs and business operations. In total, seventy-eight percent (78%) of loan applicants had their application declined or withdrawn.

Table 22: SBA Business/EIDL Loan Applicants by Organization Type and Loan Status

| | All SBA Apps | Individual-Sole Proprietors | | | Partnerships | | | Limited Liability Entities/Corporations | | | Non-Profits | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Loan Status | | Apps | Avg Emppl | % of Total | Apps | Avg Emppl | % of Total | Apps | Avg Emppl | % of Total | Apps | Avg Emppl | % of Total |
| In Process | 0 | 0 | 0.0 | 0% | 0 | 0.0 | 0% | 0 | 0.0 | 0% | 0 | 0.0 | 0% |
| Declined | 173 | 76 | 1.7 | 44% | 1 | 0.0 | 1% | 81 | 3.9 | 47% | 15 | 3.9 | 9% |
| Withdrawn | 186 | 82 | 2.6 | 44% | 3 | 11.3 | 2% | 91 | 4.8 | 49% | 7 | 0.6 | 4% |
| Approved | 104 | 40 | 0.7 | 38% | 1 | 2.0 | 1% | 51 | 5.5 | 49% | 12 | 26.2 | 12% |
| Total | 463 | 198 | 1.9 | 43% | 5 | 7.2 | 1% | 223 | 4.6 | 48% | 34 | 11.1 | 7% |

Comparing declined and withdrawn loans that received verified loss estimates from SBA to the population of approved loans clarifies that this group has largely the same impact distribution as the entities with approved loans (Table 23).

Table 23: Distribution of Approved, Withdrawn, and Declined Loans by HUD Loss Category

| Loss Category | Approved | % of Approved | Withdrawn | % of Withdrawn | Declined | % of Declined |
|---|---|---|---|---|---|---|
| HUD Category 5 losses: Real estate + content loss $150,000+ | 17 | 16.3% | 15 | 9.9% | 16 | 11.9% |
| HUD Category 4 losses: Real estate + content loss $65,000-$149,999 | 35 | 33.7% | 24 | 15.9% | 17 | 12.6% |
| HUD Category 3 losses: Real estate + content loss $30,000-$64,999 | 21 | 20.2% | 44 | 29.1% | 37 | 27.4% |
| HUD Category 2 losses: Real estate + content loss $12,000-$29,999 | 13 | 12.5% | 33 | 21.9% | 23 | 17.0% |
| HUD Category 1 losses: Real estate + content loss $1-$11,999 | 16 | 15.4% | 28 | 18.5% | 35 | 25.9% |
| No Real Estate or Content Losses | 2 | 1.9% | 7 | 4.6% | 7 | 5.2% |

The high threshold of requirements for the SBA loan program – such as credit, repayment documentation requirements, and other terms of federal assistance – could contribute to the low loan approval rate. Thus denied applicants, and those who also decide to withdraw due to burdensome requirements, still demonstrate an unmet need among impacted businesses according to the methodology HUD recommends for estimating serious unmet economic revitalization needs (Table 24). This unmet need is despite the barriers to and disincentives of federal assistance for the impacted business community that has already been discussed.

Table 24: Estimate of Unmet Economic Revitalization Needs Based off SBA Loan Data and HUD Calculation Methodology

| Small Business Administration Verified Business Property Loss of All SBA Applicants | | | |
|---|---|---|---|
| | Category | Count | Value |
| A | SBA approved & withdrawn applicants with verified HUD Category 1 Losses | 44 | $270,185 |
| B | SBA approved & withdrawn applicants with verified HUD Category 2 Losses | 46 | $995,362 |
| C | SBA approved & withdrawn applicants with verified HUD Category 3 Losses | 65 | $2,900,456 |
| D | SBA approved & withdrawn applicants with verified HUD Category 4 Losses | 59 | $5,766,639 |
| E | SBA approved & withdrawn applicants with verified HUD Category 5 Losses | 32 | $11,248,838 |
| F | SBA declined applicants with verified HUD Category 1 Losses | 48 | $272,458 |
| G | SBA declined applicants with verified HUD Category 2 Losses | 38 | $806,101 |
| H | SBA declined applicants with verified HUD Category 3 Losses | 58 | $2,501,084 |
| I | SBA declined applicants with verified HUD Category 4 Losses | 31 | $2,673,473 |
| J | SBA declined applicants with verified HUD Category 5 Losses | 27 | $7,676,287 |
| O | Total verified loss for all businesses (Estimate) | | $35,110,883 |
| | **Duplication of Benefits** | | |
| Q | SBA repair, replacement reconstruction payments | 72 | $7,478,378 |
| R | SBA debris removal, landscaping, land improvements | 26 | $852,600 |
| S | SBA furniture payments | 62 | $778,224 |
| T | SBA machinery payments | 90 | $3,486,776 |
| U | SBA inventory payments | 35 | $883,000 |
| V | Total Benefit | | $13,478,978 |
| | **Overall Business Unmet Needs** | | |
| W | Total unmet business needs estimate | | $21,631,905 |
| X | **Accounting for 15% resilience addition** | | $26,898,537 |

Outreach to local community stakeholders across the disaster-declared counties performed prior to the publication of this Plan has not indicated significant economic revitalization or small business assistance need of the scale indicated by the HUD calculation methodology, with two (2) notable geographic exceptions: the Villages of Mamaroneck and Port Chester. Westchester county, the HUD-identified MID, has by far the largest percentage of total SBA applicants and approved loans (Table 25). Within Westchester County, over seventy-five percent (75%) of the SBA loan applications are for businesses located in one of seven communities, with twenty-five percent (25%) from Mamaroneck alone (Table 26). This data reinforces the stakeholder feedback that outstanding business need exists in limited geographies and is not widespread across the disaster-impacted region.

Table 25: Distribution of SBA Loans Across Disaster-Declared Counties

| County | Loan Applications | % of Applications | Approved Loans | % of Approved |
|---|---|---|---|---|
| Dutchess | 14 | 3.02% | 2 | 1.92% |
| Nassau | 54 | 11.66% | 11 | 10.58% |
| Orange | 12 | 2.59% | 1 | 0.96% |
| Rockland | 27 | 5.83% | 3 | 2.88% |
| Suffolk | 30 | 6.48% | 3 | 2.88% |
| Westchester | 326 | 70.41% | 84 | 80.76% |

Table 26: Top 10 Westchester County Municipalities According to Quantity of SBA Loans

| Municipality | Loan Applications | % of Applications | Approved Loans | % of Approved |
|---|---|---|---|---|
| Mamaroneck | 82 | 25.15% | 29 | 34.52% |
| Yonkers | 51 | 15.64% | 10 | 11.90% |
| New Rochelle | 28 | 8.59% | 5 | 5.95% |
| Port Chester | 27 | 8.28% | 4 | 4.76% |
| Mount Vernon | 24 | 7.36% | 4 | 4.76% |
| Rye | 19 | 5.83% | 5 | 5.95% |
| White Plains | 18 | 5.52% | 6 | 7.14% |
| Harrison | 14 | 4.29% | 3 | 3.57% |
| Larchmont | 11 | 3.37% | 5 | 5.95% |
| Scarsdale | 8 | 2.45% | 1 | 1.19% |

**d. Mitigation Only Activities.** With the 2019 New York State Hazard Mitigation Plan, the New York State Division of Homeland Security and Emergency Services (DHSES) took an innovative approach in partnership with the Albany Visualization and Informatics Lab (AVAIL) at the State University of New York's Research Foundation to produce an interactive website with many lateral links offering the potential for deep locations of data rich visualizations. This departure from a static plan is an effort to shift mitigation from a reactive effort occurring after a disaster thanks to the availability of federal mitigation dollars toward an ongoing proactive process that is incorporated into all development activities. The 2019 State Hazard Mitigation Plan is available at https://mitigateny.availabs.org.

To prepare a mitigation needs assessment in relation to the CDBG-DR funds allocated to New York State for Hurricane Ida recovery, RHC reviewed the hazard and risk information available at MitigateNY for all of New York State as well as the six (6) disaster-declared counties for Individual Assistance that have been designated "most impacted and distressed" by HUD or the State in recognition of Hurricane Ida's significant impact to housing and New York's focus on directing this grant predominately to housing recovery and resilience. A total of eighteen (18) hazards were studied in the 2019 State Hazard Mitigation Plan (SHMP); however, three (3) of the hazards were determined to have $0 annualized loss and 0 annualized episodes, resulting in 0.00% daily probability of occurrence. Hazards are ranked from most severe to least by the amount of annualized loss Statewide.

Flooding is the most severe hazard resulting in $131.7M annualized loss. On average, there are seventy-nine (79) flooding events per year in New York State, of which eight (8) are classified as severe. Despite this frequency and severity, it is important to note that flooding as a result of hurricanes is captured in the separate hazard for Hurricanes and Tropical Storms. However, at the time of the 2019 SHMP preparation, data related to Hurricane Sandy was not included in the NCEI dataset. Without the benefit of Hurricane Sandy data, Hurricanes are the 10th most severe hazard facing the State. Nevertheless, the 2019 SHMP states that Long Island, along with much of New York City, is particularly susceptible to the hazards associated with hurricanes due to the low elevation that places 100 square miles at risk of storm surge flooding. Additionally, these areas are home to a large population, significant infrastructure, and valuable resources that are all at great risk from hurricanes and other tropical storms.

Using the data available at MitigateNY, RHC prepared a county-by-county analysis of hazard severity in annualized loss and probability in average events per year. (Table 27) Summing the losses and events per year across all counties produces the same top three (3) hazards as the State Plan: Flooding, Winds, and Snow Storm. Coastal Hazards, to include high surf, storm surge, rip current, and coastal and lakeshore floods, is the second most costly hazard across the Hurricane Ida impact area but occurs infrequently on an annualized basis, making it the 4th greatest risk to the region following this approach.

Table 27: Most Severe Hazards to the Disaster Declaration Area Applying 2019 SHMP Data and Methodology

| Natural Hazard | Westchester Annualized Loss (HUD-identified MID) | Westchester Average Annual Events | State-identified MID Annualized Loss | State-identified MID Annual Events | Total Annualized Loss | Total Annual Events | Composite Rank |
|---|---|---|---|---|---|---|---|
| Flooding | $266,000 | 3 | $5,171,000 | 11 | $5,437,000 | 14 | 1 |
| Winds | $265,000 | 7 | $1,405,000 | 28 | $1,670,000 | 35 | 2 |
| Snow Storm | | | $1,361,000 | 6 | $1,361,000 | 6 | 3 |
| Coastal Hazards | | | $1,940,000 | 0 | $1,940,000 | 0 | 4 |
| Tornado | $406,000 | 0 | $112,800 | 0 | $518,800 | 0 | 5 |
| Hail | $20,000 | 1 | $80,620 | 5 | $100,620 | 6 | 6 |
| Hurricane | $320,000 | 0 | $1,240 | 0 | $321,240 | 0 | 7 |
| Lightning | $12,000 | 0 | $110,850 | 2 | $122,850 | 2 | 8 |
| Cold Wave | | | $21,000 | 0 | $21,000 | 0 | 9 |
| Wildfire | | | $4,640 | 0 | $4,640 | 0 | 10 |

Figure 28 depicts the FEMA floodplains in each of the declared counties. Primary roadways have also been overlaid onto the declared counties to show potential flooding along major transportation routes. Westchester and Rockland Counties share significant flooding along the Hudson River with Nassau and Suffolk Counties at significant risk from coastal flooding. Major routes linking the barrier islands in Suffolk and Nassau Counties are located in the 100-year floodplain. Major arteries from New York City that lead out of southern Westchester are also at-risk for flooding (see Figure 29 for a more detailed map of Westchester).

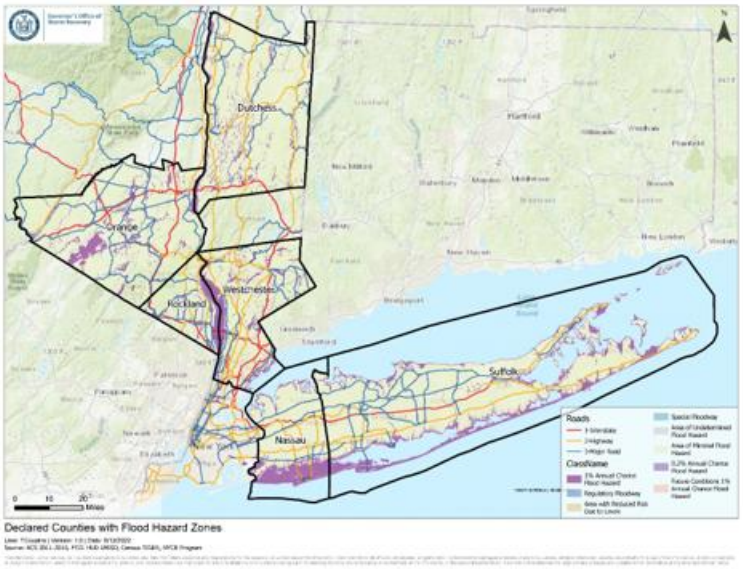



Figure 28: 1% Annual Chance and 0.2% Annual Chance Flood Hazard Areas in the Disaster-Declared Counties and Major Roads

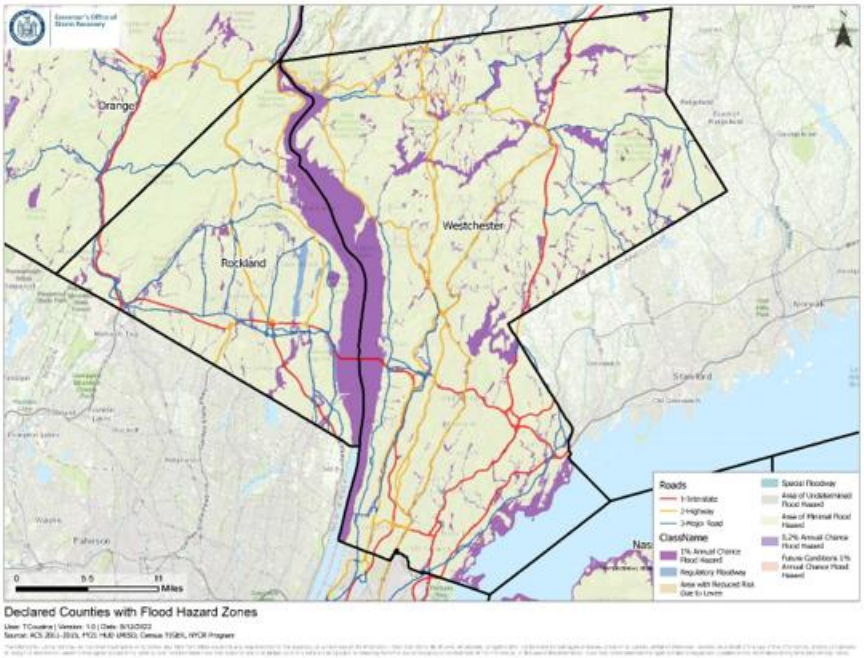



Figure 29: Detail of Flood Hazard Areas and Major Roads in Westchester County

RHC also consulted the Hazard Mitigation Plans prepared at the County level by each of the six (6) counties. These more traditional Hazard Mitigation Plans each include a risk assessment section evaluating hazard probability and impact to arrive at overall assessments of high, medium, and low risks to the specific county. The more recently adopted County Hazard Mitigation Plans also quantify in the risk assessment and include in the overall scoring of risk an

evaluation of capabilities at the County-level to respond to the hazard as well as the effects of climate change on the probability and/or impact of the hazard. The county plans adopted since 2019 additionally include assessments of community lifelines and critical infrastructure in the evaluation of risk.

FEMA's After-Action Report following the 2017 Hurricane Season recommended a new construct for disaster planning and response that considers the stability of critical infrastructure lifelines enabling the continuous operation of government and business functions essential to human health and safety or economic security(34) (Figure 30) FEMA sees lifelines as the integrated network of assets, services, and capabilities used day-to-day to support the recurring needs of the community. Focusing on the vulnerabilities of these facilities and targeting efforts to support their continuous operation will have a cascading impact in the overall pace of community recovery and lessen the indirect risks of loss of life due to inability to access critical services.

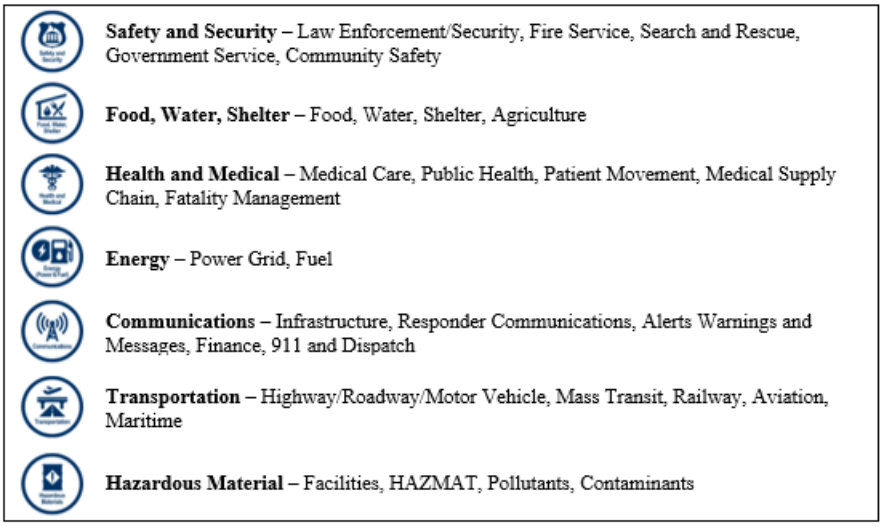



Figure 30: FEMA Community Lifelines

RHC used the high-medium-low determinations of probability and impacts to population, property, and economy identified in the individual County Hazard Mitigation Plans for each natural hazard evaluated by the county to prepare a regional assessment of risk that attempts to apply the same methodology used by the counties. RHC's composite score uses the following risk ranking equation:

**Risk Ranking = [Probability of Occurrence x 40%] + [(Impact on Population x 3) + (Impact on Property x 2) + (Impact on Economy x 1) x 40%] + [Frequency across Region x 20%]**

This approach identifies Hurricane as the top risk to the disaster-declared counties, followed by Severe Storm, Coastal Hazards/Erosion, Flood, and Severe Winter Storm. (Table 28)

Table 28: Most Severe Hazards to the Disaster Declaration Area According to County HMP Data

| Hazard | Probability | Total Impact | Regional Frequency | Risk Ranking Value | Rank |
|---|---|---|---|---|---|
| Hurricane | 2 | 18 | 2 | 8.4 | 1 |
| Severe Storm | 3 | 16 | 3 | 8.2 | 2 |
| Coastal Hazards/Erosion | 3 | 14 | 2 | 7.2 | 3 |
| Flood | 3 | 12 | 3 | 6.6 | 4 |
| Severe Winter storm | 3 | 12 | 3 | 6.6 | 4 |
| Tornado | 2 | 14 | 1 | 6.6 | 6 |
| Wildfire | 2 | 12 | 3 | 6.2 | 7 |
| Drought | 2 | 12 | 3 | 6.2 | 7 |
| Ice Storms | 1 | 12 | 1 | 5.4 | 9 |
| Earthquake | 1 | 11 | 3 | 5.4 | 10 |

Suffolk County, in their 2020 Hazard Mitigation Plan, has the most robust analysis of impact on critical facilities due to a hurricane event. The County's analysis identified a total of 10,486 critical facilities, of which 259, or 2.5%, are located in a Sea, Lake and Overland Surges from Hurricanes (SLOSH) 1 area and subject to storm surge. The County also identified 8,117 total lifelines, of which 240, or 3.0%, are similarly exposed to storm surge. When expanding out to the SLOSH 2 storm surge hazard area, the number of exposed critical facilities and lifelines increase to 596 and 495, respectively. The largest SLOSH 4 area includes 16.9% of the county's critical facilities and 13.4% of its lifelines. As a result of the exposure of critical facilities, the County's analysis projects schools would lose up to four (4) days due to a 100-year event and up to fifty-six (56) days, or nearly two (2) months, due to a 500-year event. Medical facilities would lose up to ten (10) days due to a 500-year event.

Westchester County, in their 2021 Hazard Mitigation Plan, offers an analysis of community lifelines and critical infrastructure impacts due to flooding. There are 4,659 critical facilities and 3,951 lifelines in Westchester County, of which 531 (11.4%) and 511 (12.9%), respectively, are located in the 1-percent annual chance flood event area (100-year floodplain). There are 622 (13.4%) and 599 (15.2%) critical facilities and lifelines respectively located in the 0.2-percent annual chance flood event hazard area (500-year floodplain). The majority of these facilities are located in Larchmont and Rye. The County notes that in cases where short-term functionality is impacted by flooding, other facilities of neighboring municipalities may need to increase support response functions during the event.

In total, this analysis identifies water and flooding, whether riverine, coastal, or severe storm related, as the significant risk to the disaster-declared counties. Mitigation efforts focused on reducing flood impacts and ensuring continuity of critical operations will have the greatest impact to the security and resiliency of the area. With this need being directly associated to the type of event experienced in Hurricane Ida, RHC can maximize mitigation focused investment with these grant funds to achieve both mitigation objectives and long-term recovery from storm impacts.

To address these mitigation needs, RHC created the Affordable Housing Resiliency Initiative (AHRI) and the Resilient Investments through Support and Capital (RISC) programs in its initial Action Plan. APA 1 updates the unmet needs analysis to recognize additional estimated unmet needs for infrastructure and expected additional repair needs for public and affordable housing following Hurricane Ida. In recognition of this additional unmet repair need, and the related need to mitigate infrastructure and these types of housing to reduce repair needs in the future and

protect low and moderate income ~~vulnerable~~ communities, as well as the mitigation set-aside requirement for the additional funds allocated through PL 117-80, RHC is allocating an additional $4.04 million to AHRI and $8.01 million to RISC from funds made available under PL 117-80, as well as reallocating $1.29 million in general planning funds to RISC via APA 1. These updated allocations were validated in consultation with key stakeholders, including local jurisdictions, and Affordable and Public housing providers.

**3. General Requirements**

**a. Citizen Participation.** The primary goal of the Citizen Participation Plan for New York State's Hurricane Ida allocation is to provide reasonable ongoing opportunity for citizen access and ability to respond to and comment on the use of grant funds. The Plan sets forth policies and procedures to provide New Yorkers with the opportunity to involve themselves in the recovery process as it pertains to CDBG-DR funds. RHC has implemented the Citizen Participation Plan to meet the requirements of the CDBG-DR funding for Hurricane Ida, in accordance with the alternative requirements as specified by HUD in the Federal Register Vol. 87, No. 100 (87 FR 31636) published on May 24, 2022 . The Chief Strategy and Program Officer at RHC will be responsible for ensuring the requirements outlined within this plan are enforced throughout the distribution of this funding.

RHC requires each local government receiving assistance to follow this detailed citizen participation plan. The State may provide technical assistance to facilitate citizen participation where requested, including responding to technical assistance requests made by citizens through one of the outlets outlined in this document. The level and type of technical assistance is determined by the applicant/recipient based upon the specific need of the community's citizens.

**Outreach and Engagement.** In the development of this disaster recovery action plan, RHC consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive.

**State Agencies**

RHC consulted with the following State agencies to gain a better understanding of disaster impacts and the current possible shortcomings of State and local funding for disaster recovery:

Table 31: List of State Agencies Consulted

| Consultation with State Agencies | |
|---|---|
| New York State Division of Homeland Security and Emergency Services | July 28, 2022 |
| New York State Department of State | August 5, 2022 |
| New York State Office of New Americans | August 5, 2022 |
| New York State Department of Environmental Conservation | August 11, 2022 |

Through these consultation meetings, RHC was able to gather data, experiences, and agency expertise to inform the unmet needs assessment and Program design.

**Local Government and Stakeholders**

After developing the initial unmet needs assessment from State agency and federal data, RHC held public engagement meetings with local counties, city governments, and long-term recovery groups. RHC staff were allotted time to discuss the initial results and ask for feedback on the unmet needs they have identified in their communities. The goals of this engagement were to present RHC's initial unmet needs assessment and understand the gaps where local governments, partners, and stakeholders could present more insight.

Table 32: List of Local Governments and Stakeholders Consulted

| Outreach to Local Government/Stakeholders | |
|---|---|
| New York State Senator James Gaughran, District 5 | July 25, 2022 |
| New York State Senator Anna M. Kaplan, District 7 | July 28, 2022 |
| New York State Senator Jamall T. Bailey, District 36 | July 28, 2022 |
| New York State Senator Shelley Mayer, District 37 | July 21, 2022 |
| New York State Senator Pete Harckham, District 40 | July 25, 2022 |
| New York State Assemblywoman Gina L. Sillitti, Assembly District 16 | July 28, 2022 |
| New York State Assemblywoman Amy Paulin, Assembly District 18 | August 3, 2022 |
| New York State Assemblyman J. Gary Prelow, Assembly District 89 | July 27, 2022 |
| New York State Assemblyman Nader J. Sayegh, Assembly District 90 | July 26, 2022 |
| New York State Assemblyman Steven Otis, Assembly District 91 | August 5, 2022 |
| New York State Assemblyman Thomas J. Abinanti, Assembly District 92 | August 4, 2022 |
| New York State Assemblyman Chris Burdick, Assembly District 93 | August 10, 2022 |
| Westchester County – County Executive Office | July 27, 2022 |
| Westchester County – Department of Emergency Management | July 27, 2022 |
| Westchester County – Department of Planning | July 27, 2022 |
| City of Glen Cove | August 2, 2022 |
| City of New Rochelle | August 3, 2022 |
| City of Rye Brook | August 4, 2022 |
| City of White Plains | August 4, 2022 |
| City of Yonkers | July 26, 2022 |
| Town of Eastchester | July 29, 2022 |
| Town of Harrison | July 25, 2022 |
| Town of North Hempstead | July 25, 2022 |
| Village of Bronxville | August 1, 2022 |
| Village of Great Neck | July 26, 2022 |
| Village of Larchmont | July 25, 2022 |
| Village of Mamaroneck | August 4, 2022 |
| Village of Rye Brook | August 3, 2022 |
| Village of Tuckahoe | August 5, 2022 |
| Greenburgh Housing Authority | August 2, 2022 |
| New Rochelle Municipal Housing Authority | August 2, 2022 |
| North Hempstead Housing Authority | July 29, 2022 |
| Peekskill Housing Authority | July 21, 2022 |
| Port Chester Housing Authority | July 29, 2022 |
| Tarrytown Municipal Housing Authority | August 2, 2022 |
| Town of Hempstead Housing Authority | July 22, 2022 |
| Town of Oyster Bay Housing Authority | July 25, 2022 |
| Village of Great Neck Housing Authority | July 26, 2022 |
| White Plains Housing Authority | July 22, 2022 |
| Yonkers Municipal Housing Authority | July 22, 2022 |

**Outreach to Vulnerable Populations and those with Limited English Proficiency**

RHC recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through a robust dialogue within the communities impacted by Hurricane Ida, including a specific focus on consulting with community-based organizations that cater specifically to the needs of vulnerable populations and individuals with Limited English proficiency. RHC consulted directly with these community-based organizations on program design priorities, eligibility criteria, and outreach strategies. A list of RHC's outreach activities is included below.

In addition to the outreach efforts documented in this Plan, RHC will take the following measures to ensure individuals with Limited English proficiency and vulnerable populations have equitable access to participate in the proposed activities outlined in this Plan:

• Adhere to the Language Access Plan established, including providing translation and interpretation services upon request;
• Provide website accessibility for individuals with disabilities and Limited English proficiency; and
• Coordinate program outreach and announcement with community-based organizations in impacted areas.

Table 31: List of Community Based Organizations Consulted

| Outreach to Community Based Organizations | |
|---|---|
| Westchester Housing Action Council | July 15, 2022 |
| Community Housing Innovations | July 18, 2022 |
| Center for Aging in Place | July 18, 2022 |
| United Community Center of Westchester | July 18, 2022 |
| Urban League of Westchester | July 20, 2022 |
| Neighbor's Link | July 20, 2022 |
| Economic Opportunity Commission of Nassau County | July 22, 2022 |
| Uniondale Community Land Trust, Inc. | July 22, 2022 |
| Long Island African American Chamber of Commerce | July 22, 2022 |
| Options for Community Living, Inc. | July 22, 2022 |
| Long Island Family and Elder Care | July 26, 2022 |
| La Fuerza Unida, Inc. | July 26, 2022 |
| Urban League of Long Island | July 26, 2022 |
| Long Island Association | July 26, 2022 |
| Community Development Corporation of Long Island (CDCLI) | July 26, 2022 |
| Westchester County Association | July 27, 2022 |
| Obreros Unidos | July 27, 2022 |
| Human Development Services of Westchester | July 26, 2022 |
| Westchester Disabled on the Move, Inc. | July 26, 2022 |
| Yonkers Sanctuary Movement | July 27, 2022 |
| Westchester Residential Opportunities | July 28, 2022 |
| Long Island Housing Services, Inc. | July 28, 2022 |
| Building Realty Institute | July 29, 2022 |
| Family & Children's Association | July 29, 2022 |
| Community Center of Northern Westchester | August 2, 2022 |
| Catholic Charities of Westchester | August 3, 2022 |
| Community Resource Center | August 5, 2022 |
| Don Bosco Workers | August 5, 2022 |

## Community Response to Unmet Needs

RHC was able to receive input from local government stakeholders and organizations providing daily services to vulnerable populations in the communities most impacted by Hurricane Ida on the types of programming the communities perceive as most impactful. These meetings provided additional information on unmet recovery needs not necessarily reflected in formal data sets.

## Housing

The vast majority of respondents affirmed the priority to focus on providing housing for low-and moderate-income households. Throughout several meetings, it was emphasized that the communities of Mamaroneck and Port Chester in Westchester County suffered some of the

greatest impact from Hurricane Ida, with a large Latino renter population that found it difficult to recover from the extreme losses. While some families were already living in substandard and unsafe housing conditions, Hurricane Ida left them in a situation where they were forced to leave their personal belongings and their homes without knowing where to go next. Additionally, it was emphasized that many of these families did not benefit from the post-storm sources of federal or State disaster recovery assistance. One interviewee in particular expressed frustration that after applying to FEMA and having their assistance paid to their landlord instead of the individual in error, with the individual had no assistance to rebuild. The Village of Mamaroneck described Hurricane Ida's impact in four waves. The first wave was seeing furniture and belongings that can be moved in and out of homes left out on the streets drifting away in water. The second wave included the sheetrock and insulation removed from the homes. The third wave was of all the flooring, and the last wave was the damaged heating, air conditioning and washer/dryer equipment that was no longer operable due to water damage.

As described earlier in this document, the Public Housing Authorities that were impacted by Hurricane Ida also expressed their inability to receive federal disaster recovery assistance to rebuild and make the buildings more resilient to future storms. Specifically, Greenburgh Housing Authority and Yonkers Municipal Housing Authority described in detail the damage sustained by buildings that greatly impacted elderly residents with significant health conditions. Both housing authorities have yet to receive any federal disaster recovery assistance for the repairs needed.

**Infrastructure/Mitigation**

Throughout RHC's engagement with local municipalities impacted by Hurricane Ida, several expressed the need to fund municipality-wide analysis to better understand the nature of flooding, and the potential solutions to these flooding issues. Other local municipalities identified that their unmet need may be a minimal percentage of a local match to help complete funding of projects submitted to FEMA's Hazard Mitigation Grant Program (HMGP). Overall, it was expressed that the infrastructure improvements needed to the areas of Westchester County that were significantly impacted by Hurricane Ida may exceed this allocation.

In addition to the activities above, RHC has published this action plan on its website for a 30-day public comment period. Citizens were notified through press releases and statements by public officials, including but not limited to state legislators and local municipalities. In addition, RHC will inform all community-based organizations listed above. RHC will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired) and limited English proficiency (LEP).

A summary of citizen comments on this action plan, along with RHC responses, is in Appendix c of this document.

For more information, citizens can refer to RHC's citizen participation plan that can be found at https://hcr.ny.gov/office-resilient-homes-and-communities

**Public hearings.** RHC's Citizen's Participation Plan ensures that there is reasonable and timely access for public notice and comment on the activities proposed for the use of CDBG-DR grant funds. Federal Register Vol. 87, No. 31736 requires that the agency convene at least one public hearing, virtually or in person, to solicit public comments on the proposed Plan after it is published on the website and before submittal of the action plan to HUD.

The State will hold a total of two (2) public hearing meetings during the public comment period. The purpose of these public hearings will be to give participants a brief overview of the program and to provide them with the opportunity to ask questions about the program and the proposed use of funds and/or propose alternatives. In addition to serving as an outreach platform, these meetings will provide RHC an opportunity to focus on regionally specific issues and challenges.

In the interest of supporting greater participation from the public, RHC will make special consideration for persons with Limited English Proficiency (LEP) and persons with disabilities. RHC has developed and implemented a Language Access Plan (LAP). This Action Plan, its substantial amendments, and other programmatic material, will be translated and made available in Spanish. Summaries of vital information and changes contained in the Action Plan and substantial amendments, as well as information on the public hearings, how to submit public comments, and how to request interpretation and/or translation, will be made available in Portuguese, Italian, Chinese, French Creole, Persian, Yiddish, Russian, Polish, Arabic, French and Tagalog. In addition, individuals who require auxiliary aids, including but not limited to a sign language interpreter, or special assistance at public hearings should make a request at least seventy-two (72) hours in advance of the event. **To make a request via telephone, contact 212-480-4663or send an email to rhcinfo@hcr.ny.gov**. RHC will coordinate with the Community-based organizations referenced above on outreach for the Initial Action Plan public hearings to address barriers to equitable engagement and participation. In the event RHC identifies additional barriers that may limit equitable participation, RHC may take reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with LEP.

There will be one (1) in-person public hearing held in Westchester County in a facility that is physically accessible to persons with disabilities. A second public hearing will be held virtually.

**In-Person Public Hearing will be held in the MID county of Westchester on September 8th, 2022.**

Location: New Rochelle City Hall
Time: 6:30 PM

**Virtual Public Hearing will be held on September 13th, 2022** and will follow the State's procedures for virtual hearings, as follows:

• The State will post a public notice announcement on RHC's website at: https://stormrecovery.ny.gov/
• Instructions for joining the meeting and the meeting link with a call-in number will be provided on the website alerting the public to the upcoming public comment period and hearing.
• Hearings will be held at times convenient to potential and actual beneficiaries with accommodation for persons with disabilities and appropriate auxiliary aides and services to ensure effective communication.
• During all virtual public hearings, the State will provide participants an opportunity to ask questions in real time, with answers coming directly from the grantee representatives to all attendees.
• Auxiliary aids and service are available upon request to Individuals with disabilities. • All questions submitted during virtual public hearings will be collected and summarized along with responses and posted with the submitted Action Plan.

**Public Comment**

Opportunities for citizen input will be provided throughout the planning process through a public comment process that consists of a period for submitting comments on the Action Plan and substantial amendments of the Action Plan. The State will provide a thirty (30) day timeframe for receiving public comments on the Plan and will obtain comments through an email address, via webform, or via a mailing address published on the disaster recovery website. Upon subsequent publication of substantial amendments, the State will provide a reasonable opportunity of at least thirty (30) days. for public comment.

The State will receive comments via mail, email, or webform at:

Mail: Office of Resilient Homes and Communities

641 Lexington Avenue (5th Floor),
New York, NY 10022

Website: https://hcr.ny.gov/office-resilient-homes-and-communities
Email: rhcinfo@hcr.ny.gov

Any updates or changes made to the Action Plan in response to public comments will be clearly identified in the Plan. Additionally, a summary of comments on the Plan or substantial amendment, and its corresponding response, will be uploaded in DRGR with the Action Plan or substantial amendment.

**Complaints.** Complaints alleging violations of fair housing laws will be directed to HUD for immediate review (phone: 1-800-496-4294, fax: (202) 485-5737, or email:

complaintsoffice02@hud.gov. Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). RHC will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on https://hcr.ny.gov/office-resilient-homes-and-communities to demonstrate adequate procedures are in place to prevent fraud, waste and abuse.

The State will handle all citizen complaints received by the State, any contractor or vendor working on the CDBG-DR program or project, and/or other program resources by:

• Conducting investigations as necessary;
• Finding a resolution; or
• Conducting follow-up actions.

Citizens may file a written complaint through the disaster recovery email rhcinfo@hcr.ny.gov or submit via mail to the following address:

Office of Resilient Homes and Communities
641 Lexington Avenue (5th Floor),
New York, NY 10022

The State's goal is to provide an opportunity to resolve complaints in a timely manner. RHC will provide a timely written response (either by letter or email, as applicable) within fifteen (15) business days of the receipt of the complaint, as expected by HUD. Should the State require more time than described above to respond to a complaint, RHC will document the reason for the delayed response.

If the complaint is not satisfied by RHC's response or subrecipient determination, the complainant may file a written appeal by following the instructions issued in the letter of response. If after the appeals process the complainant has not been satisfied with the response, a formal complaint may then be addressed directly to the regional HUD office at:

Department of Housing & Urban Development
26 Federal Plaza #3541
New York, NY 10278

**b. Public Website** The Office of Resilient Homes and Communities will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements,

activities, program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through: https://hcr.ny.gov/office-resilient-homes-and-communities. Specifically, RHC makes the following items available: the action plan created using DRGR (including all amendments); each quarterly performance report (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipient contracts); and a summary including a description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

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

The website will be updated in a timely manner to reflect the most up-to date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

The State will provide multiple methods of communications including, but not limited to, the public website, phone numbers and email addresses to provide applicants for recovery assistance with timely information to determine the status of their application.

Website: https://hcr.ny.gov/office-resilient-homes-and-communities
Email Address: rhcinfo@hcr.ny.gov

For questions regarding application status for the Ida Homeowner Recovery and Reimbursement Program (IHRR), please call or write to the Ida Recovery Partner in your county:

Nassau and Suffolk Counties:
Long Island Housing Partnership Inc.: (631) 435-4710 or ida@lihp.org

Westchester County:
Habitat for Humanity of NYC and Westchester: (646) 779-8893 or ida@habitatnycwc.org

Rural Development Advisory Corporation: (845) 713-4568 or ida@ocrdac.org

Dutchess, Orange, and Rockland Counties:
Hudson River Housing: (845) 454-5176 Ext. 118 or HRHihrr@hudsonriverhousing.org

As a State entity, RHC's public website is subject to the standards of New York State Information Technology Policy NYS-P08-005: Accessibility of Information Communication Technology. This policy is based on Section 508 of the Rehabilitation Act of 1973, as amended, and the Web Content Accessibility Guidelines ("WCAG") 2.0 A and AA standards. The WCAG standards support web content that is more accessible to people with disabilities by providing testable success criteria organized under four principles: perceivable, operable, understandable, and robust. New York State Office of Information Technology Services has established a goal of 90% compliance for all State websites, greater than the industry standard of 84.7%.

RHC includes an accessibility statement along with a link to the NYS-P08-005 policy document on the website.

In addition to providing accessibility for persons with disabilities, HCR's website includes translation function in over a dozen languages to support meaningful access by Limited English Proficiency (LEP) persons in their preferred language. The translation function can be accessed on every page of the website. All vital documents are available on the website in English as well as in translation per the Ida Language Access Plan.

**c. Amendments** Over time, recovery needs may change. Thus, RHC will amend the disaster recovery action plan as often as necessary to best address our long-term recovery and goals. This plan describes proposed programs and activities. As programs and activities develop over time, amendments may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

Amendments will identify exactly what content is being added, deleted or changed; clearly illustrate where funds are coming from and moving to; and include a revised budget allocation table that reflects the entirety of all funds, as amended. All amendments will be posted to the State's website.

**Substantial Amendment**. A change to this action plan is a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement; and/or
- The allocation or reallocation of a monetary threshold that is greater than $2 million and more than 10 percent (10%) of a program allocation.

When the State pursues the substantial amendment process, the amendment will be posted at https://hcr.ny.gov/office-resilient-homes-and-communitiesfor a thirty (30) day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. RHC will review and respond to all public comments received and submit to HUD for approval. The period of public comment will be advertised via a press release on RHC's website. RHC will convene one virtual public hearing during the public comment period for substantial amendments that include the presentation of new program(s) only, to allow for questions or clarifications from community members.

**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 and does not require posting for public comment. The State will notify HUD at least five (5) business days before the amendment becomes effective. All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

**d. Displacement of Persons and Other Entities.** To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, RHC will coordinate with all agencies and entities necessary to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and the implementing regulations at 24 CFR Part 570.496(a) to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA) are met.

- Residents who are not displaced by Program activities but must relocate temporarily will receive assistance per the provisions of URA and applicable Program policies, whichever is more comprehensive.
- Comparable replacement dwellings must provide reasonable accommodation for disabled household members or other appropriate supportive services as needed for senior residents.

These regulations and requirements apply to both property owners and tenants in the event that proposed projects cause the displacement of persons or other entities. Applicants to the competitive programs are responsible for budgeting and administering relocation in accordance with approved project plans. RHC has budgeted for relocation assistance associated with all direct administered programs assisting homeowners or landlords.

The state's Residential Anti Displacement and Relocation Assistance Plan (RARAP) specific to CDBG-DR funded activities is located on the RHC website at: https://hcr.ny.gov/office-resilient-homes-and-communities. This plan will be amended as needed to reflect Hurricane Ida activities.

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

**e. Protection of People and Property.** This Action Plan explains how this allocation will reduce the effects of natural disasters and eliminate long-term risks to New York. The goal of the programs outlined in this Plan is to minimize risks and vulnerabilities of people in hazard-prone areas and reduce the potential impact of natural disasters on new and existing properties and infrastructure.

Through its programs, RHC intends to promote high quality, durable, energy efficient, sustainable, and mold resistant construction in areas impacted by the disaster. All newly constructed buildings must meet all locally adopted building codes, standards, and ordinances. In the absence of locally adopted and enforced building codes, the requirements of the New York State Uniform Building Code will apply. Future property damage will be minimized by requiring that any funded rehabilitation be in accordance with the goal of making structures more resilient against storm water flooding. The incorporation of these measures will help communities build back safer and stronger than before Hurricane Ida and reduce costs to recover from future disasters.

Some of the ways that the State will ensure CDBG-DR funds are being used to build resilience into all recovery programs are included in the sections below.

**Elevation standards.** For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent (1%) annual (or 100-year) floodplain, or the Federal Flood Risk Management Standard Floodplain, if applicable, must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent (1%) annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three (3) feet above the 100-year floodplain if it meets the definition of "Critical Action".

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 Rehabilitation Act and/or the Americans with Disabilities Act. Program guidelines will further describe accessibility requirements.

**Flood Insurance Requirements.** Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). In the event of a transfer of the property, the assisted property owner must notify the transferee, in documents evidencing the transfer of ownership of the property, of the requirements to obtain and maintain flood insurance in perpetuity in accordance with federal law. RHC may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. RHC is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

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

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

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

**Construction Standards.** RHC will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes. RHC, including through its subrecipients when necessary, intends to establish relationships with municipal building code enforcement offices prior to program launch to coordinate on inspection and permitting timelines and establish methods of communication and exchange of information related to program-assisted properties.

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

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

RHC and its subrecipients will use the New York State Uniform Building and Energy Standard. All local municipalities must adhere to those standards and may adopt more restrictive standards, enforced by local code enforcement. Additional restrictive standards in place at a local level will be adhered to for the proposed programs or activities.

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

For infrastructure projects, RHC will encourage, to the extent practicable, implementation of the New York State Uniform Building and Energy Standard and local codes, as applicable.

RHC and its subrecipients will rely on the determination made by the appropriate code enforcement, including but not limited to the local floodplain official who is qualified to confirm that a building is substantially damaged, as evidenced by appropriate documentation showing compliance with applicable requirements. Substantial Damage is generally defined by FEMA as damages in excess of 50% of the value of the structure.

RHC is the Responsible Entity for compliance and performance of environmental reviews under 24 FR Part 58 and maintains a Certifying Officer responsible for the requirements of section 102 of the National Environmental Policy Act of 1969 (NEPA). The Certifying Officer additionally serves as an Officer responsible for the State Environmental Quality Review Act (SEQRA) on behalf of the HTFC Board of Directors. The Certifying Officer is responsible for ensuring the necessary environmental reviews are completed prior to the obligation of funds and issuing the Environmental Clearance Letter (ECL) in addition to being authorized to execute the Request for Release of Funds and Certification.

RHC will meet the applicable environmental requirements by:

- Completing environmental review(s) pursuant to 24 CFR part 58;
- Adopting another Federal agency's environmental review, approval, or permit; and/or

- Directing its partners and/or subrecipients to implement and monitor environmental conditions and mitigation as documented through their partner/subrecipient agreement.

**Contractors Standards.** Contractors selected under RHC or its subrecipients will make every effort to provide opportunities to low and very-low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. RHC will ensure that Section 3 requirements are outlined in all applicable contracts and subrecipient agreements. Further, RHC will build the capacity of stakeholders, including subrecipients and contractors, to meet Section 3 standards through technical assistance, tools and guidance. Lastly, RHC and its subrecipients, where applicable, will consult with local community organizations to facilitate job fairs in the most impacted communities. RHC will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Contractors will comply with Section 3 of the Housing and Urban Development Act of 1968 (12. U.S.C. 1700lu) and implementing regulations at 24 CFR part 75. Contractors selected by RHC or its subrecipients will ensure, to the greatest extent feasible, that employment and other economic opportunities are directed to low- and very low-income persons, particularly low residents and business that meet the qualifications of the project. Contractors will make every effort to recruit, target, and direct opportunities to Section 3 residents and businesses as well as notifying Section 3 residents about training opportunities.

RHC makes beneficiaries aware of the risks of contractor fraud and other fraudulent activity by posting on the RHC website informational materials that describe the signs of fraudulent activity, list simple steps individuals can take to protect themselves from fraud and include RHC's fraud Hotline and email contact information as well as the contact information of other relevant local and State authorities. These materials are made available in translation according to RHC's Limited English Proficiency (LEP) policies and procedures.

RHC or its subrecipients will enforce contractual obligations for all contractors procured by the agency or its subrecipients for all rehabilitation work performed in connection with the proposed programs. RHC will hold all subrecipients, and any other entities designated as beneficiaries of this funding, liable for enforcing the same. Rehabilitation contract work provided through RHC's and subrecipients' procured contractors may be appealed by homeowners whose property was repaired. Appeals must comply with the policies and procedures of the specific program under which the homeowner's property was rehabilitated.

RHC or its subrecipients will require a warranty period post-construction for housing work performed by program-funded contractors to be guaranteed for a period of one year with formal notification to beneficiaries on a periodic basis. Warranty notification periods will be detailed in the respective contract documents and/or policies and procedures and will pertain to the scale and type of work being performed. Prior to completion or at any time during the guarantee

period when RHC, subrecipients, or the homeowner gives notice to contractor, the contractor shall promptly correct all work which is incorrect, defective, incomplete, omitted, or not otherwise in compliance with contract documents. Contractors must provide all warranties prior to a final inspection, during which, photographs will be taken for documentation purposes and homeowners will be provided with applicable warranty information.

To ensure construction costs are reasonable and consistent with market costs prior to, no later than the time and place of construction, RHC and its subrecipients may utilize industry standard cost estimation tools, as well as publicly available information on market pricing, to estimate the cost for anticipated services. Open bids (IFB/RFP) are posted on RHC's website, which is fully available to the public, and advertised in the Contract Reporter.

**Preparedness, Mitigation and Resiliency.** Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

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

- Considering whether properties have sustained repetitive losses before committing program funds for rehabilitation and, to the extent feasible and permittable, mandating that all rehabilitation activities incorporate measures to prevent repeat flooding to the level experienced during Hurricane Ida.
- Providing opportunity for tenants to relocate into safe and permanent housing.
- ~~Prioritizing households while a~~Affirmatively furthering fair housing~~ for historically disadvantaged and all vulnerable populations, as defined above~~. For IHRR, LMI applicants will be prioritized, followed by non-LMI applicants ~~below 120% AMI who are members of vulnerable or historically disadvantaged groups~~, on a first come, first served basis, below 120% AMI. Applicants above 120% AMI and up to 160% AMI~~ who are members of these groups may be served~~, from lowest to highest income, ~~if funds remain available~~based on the availability of funding, subject to the Overall Benefit requirement to spend 70% of grant funds to benefit LMI persons.

**Emphasizing High Quality, Durability, Energy Efficiency, and Sustainability**
For rehabilitation construction, RHC and its subrecipients will follow the Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold-resistant products when replacing surfaces such as drywall. When older or obsolete products are replaced as part of the rehabilitation work, rehabilitation is required to use

ENERGY STAR labeled, WaterSense-labeled, or Federal Energy Management Program-designated products and appliances or other equivalent.

**Supporting the Adoption and Enforcement of Modern and Resilient Building Codes**
RHC will require all construction to adhere to the local building codes to ensure compliance. Further, RHC will support the enforcement of modern and resilient building codes in conjunction with the State of New York Department of State, which on a quarterly basis meets to maintain or update the New York State Uniform and Energy Code.

**Establishing and Supporting Recovery Efforts by Funding Feasible, Cost-Effective Measures**
The following cost-effective measures will be taken to make communities more resilient against a future disaster:

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

**Making Land Use Decisions to Reduce Future Natural Hazard Risks**
To the extent that RHC is involved in a land use action associated with a funded property or project under this allocation, RHC will advocate for a land use decision that is most reflective of safe standards to reduce future natural hazard risks, including climate-related risks, and remove people and property from harm's way.

**Increasing Awareness of the Hazards**
Seeking input from stakeholders and communities around the most impacted and distressed areas is an important component of the planning process. RHC consulted with local officials, and the public via public hearings, on the purpose and goals of mitigation; understanding risks, threats and hazards in MID areas; and gathering feedback on how to craft programs that will meet the needs of the communities as quickly as possible. In addition to gaining feedback, this process helped local stakeholders and members of the public understand what to expect from CDBG-DR funding and allowed them to play a key role in shaping the outcomes of this Plan.

**Long-Term Recovery Planning**
This plan details how funds will be allocated to reduce the effects of natural disasters and eliminate long-term risks to New Yorkers in the impacted areas. The purpose of the mitigation activities outlined in this Plan is to reduce risk and vulnerabilities of people in hazard-prone areas, particularly
vulnerable populations, and historically underserved communities.

This Plan will promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, including climate-related natural hazards, by proposing mitigation programs aimed to provide CDBG-DR funds to public housing entities, housing

developers, not-for-profit associations, units of local/County government, and other public entities including State agencies and authorities and public schools and universities to support the completion of site-specific or community mitigation projects that will improve resilience against identified hazards or repetitive loss events. This Plan also proposes the use of planning funds to support efforts by selected subrecipients to perform feasibility and engineering studies that can inform the design and funding of future community resiliency upgrades. RHC intends to provide technical assistance to support the selected subrecipients on leveraging additional funding and project design.

**Using the FEMA-Approved Hazard Mitigation Plan**
RHC completed a risk-based mitigation needs assessment to identify and analyze all significant current and future disaster risks that provide a substantive basis for the activities proposed in Section 4. Grantee Proposed Use of Funds. The assessment utilizes the findings from the County Hazard Mitigation Plans adopted by the disaster-declared counties. In addition, the assessment includes data and research acquired from essential data resources to arrive at a thorough assessment of the hazards which pose substantial risk of loss of life, injury, damage, and loss of property, along with suffering and hardship.

Through the application and cost evaluation processes described in Program guidelines, RHC will ensure that all mitigation efforts have a reasonable cost relative to other alternatives. The documentation will include the cost of the mitigation strategy and a description and documentation of cost reasonableness

**Broadband Infrastructure in Housing.** Any substantial rehabilitation, as defined by 24 CFR 5.100, reconstruction, or new construction of a building with more than four rental units must include installation of broadband infrastructure, except when RHC determines and documents that:

- The location of the new construction or substantial rehabilitation makes installation of 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.

**Cost-Effectiveness.** Program-specific policies and procedures will address the assessment of cost-effectiveness for each proposed program or activity receiving CDBG-DR funds, including housing alternatives if needed. Further, RHC and its subrecipients will follow the appropriate

procurement policies to ensure selection of cost reasonable contractors to perform rehabilitation work contracted by the agency.

For purposes of the programs proposed in this Action Plan, RHC will determine a structure to be "not suitable for rehabilitation" based on the determination from local building code enforcement.

RHC defines "demonstrable hardship" as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed on a case-by-case basis to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include, but is not limited to, excessive amounts of debt due to a natural disaster, disability, etc.

**Duplication of Benefits.** Section 312(a) of the Stafford Act requires the Federal Government to assure that no person receiving Federal financial assistance receives funds for any part of a loss resulting from a major disaster already paid by insurance or any other source. Section 312(c) makes any person receiving duplicative assistance liable to the Federal Government for the duplicative amount and states that "the agency which provided the duplicative assistance shall collect [it] from the recipient when the head of such agency considers it to be in the best interest of the Federal Government" (42 USC 5155(c)).

To prevent DOB, RHC has established policies and procedures related to the identification, management, and prevention of duplication that comply with the DOB guidance for CDBG-DR grantees outlined in Federal Register Vol. 84, No. 119, published June 20, 2019.

## 4. Grantee Proposed Use of Funds

**Overview.** RHC is the lead agency and responsible entity for administering $68,228,000 in CDBG-DR funds allocated for disaster recovery. RHC's direct administration of the funds includes the use of subrecipients for implementation of the Ida Homeowner Repair and Reimbursement program and the Renters Safe Housing Initiative. The programs administered by RHC and/or subrecipients include:

- Renters Safe Housing Incentive
- Ida Homeowner Repair and Reimbursement
- Affordable Housing Resiliency Initiative
- Resilient Investments through Support and Capital

**a. Program Budget**

| Program Category | Program | Budget | HUD identified MID Budget | Grantee identified MID Budget | % of Allocation | Maximum Award | National Objective | Estimated Outcome |
|---|---|---|---|---|---|---|---|---|
| Housing | Rehab | $12,936,244.77 ~~15,706,777.00~~ | $10,348,995.82 ~~$12,565,421.60~~ | $2,587,248.95 ~~$3,141,555.40~~ | ~~23.02~~18.96% | $365,000 ~~319,999~~ | LMI/UN | 150~~5~~ ~~03~~ Homes |
| | Buyout | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | New Construction | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | Other | $11,176,805.53 ~~24,828,808.00~~ | $ 10,059,124.98~~$ 19,863,046.40~~ | $ 1,117,680.55~~$ 4,965,761.60~~ | ~~36.39~~16.38% | $5~~10~~0,000.00 | LMI/UN | 200~~1~~ ~~2~~ Properties |
| Economic Revitalization | Workforce Training | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | Business Grants | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | Other | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| Infrastructure | Water/sewer Improvements | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | Health Facilities | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |

| Program Category | Program | Budget | HUD identified MID Budget | Grantee identified MID Budget | % of Allocation | Maximum Award | National Objective | Estimated Outcome |
|---|---|---|---|---|---|---|---|---|
| | Other | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| Public Services | Legal Services | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | Housing Counseling | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| | Other | $0.00 | $0.00 | $0.00 | 0.00% | $0.00 | N/A | N/A |
| Mitigation | Mitigation | $38,766,166.70 ~~22,343,632.00~~ | $32,002,663.59 ~~$ 21,513,950.30~~ | $6,763,503.11 ~~$ 829,681.70~~ | ~~32.755~~ 56.82% | $~~53~~,000,000.00 | LMI/UN | 2440 ~~Plans or planning projects;~~ 46,500~~300~~ residents protected from future flooding |
| Admin | Admin | $3,411,400.00 | $2,729,120.00 | $682,280.00 | 5.00% | $0.00 | N/A | N/A |
| Planning | Planning | $1,937,383.00 | $1,549906.40 | $387,476.60 | 2.84% | $0.00 | N/A | N/A |
| **Total** | | **$68,228,000.00** | **$54,582,400.00** | **$13,645,600.00** | **100.00%** | | | |

Data Source(s): N/A

**Connection to Unmet Needs.** As required by the Federal Register/Vol. 87, No. 100/May 24, 2022 (87 FR 31636), RHC will allocate at least eighty percent (80%) of the funds to address unmet needs with HUD-identified "most impacted and distressed" areas. The remaining 20 percent (20%) of the allocation may be used to address unmet needs that received a residential

major disaster declaration for Hurricane Ida. HUD has identified Westchester County as the "most impacted and distressed" (MID) area and RHC's unmet needs assessment further localizes the greatest impacts and unmet needs in southern and western Westchester County. RHC is electing to identify the five (5) counties receiving a Presidential declaration for individual assistance as State MID areas. These areas are:

- Nassau County
- Suffolk County
- Rockland County
- Orange County; and
- Dutchess County.

This action plan primarily considers and addresses housing unmet needs along with mitigation activities. This aligns with RHC's overall assessment of unmet needs which indicates approximately sixty four percent (64%) of remaining need is related to housing while simultaneously highlighting the challenges to adequately assess the unmet needs of renters. Programs are designed to address needs spanning public housing, private multi-family affordable housing, single family homeowners, and individual renters. This action plan includes significant investments in both site-specific and community-based mitigation upgrades, in keeping with observations of overwhelmed stormwater and drainage systems throughout the disaster area as a contributing factor to the flooding and loss of life and property incurred.

Programs targeting small businesses are not included in RHC's plan despite economic unmet needs. RHC's past efforts to structure CDBG-DR programs to deliver meaningful assistance to the types of small businesses prevalent in the region (leased real estate, high turnover inventory that is often perishable, potential for undocumented workforces, etc.) have faced significant challenges. In addition, community stakeholder input to date, including from workforce development entities, has deprioritized business needs in favor of greater investments in individual housing and community infrastructure.

At least seventy percent (70%) of all program funds will benefit LMI persons or households. All four programs prioritize grants and projects benefiting LMI persons and communities. The Housing Programs and Affordable Housing Resiliency Initiative will be publicized to LMI applicants and beneficiaries, which may also include ~~as well as~~ vulnerable populations and historically disadvantaged members of protected classes. Urgent need awards are anticipated in limited circumstances, including when Program budgets allow and the beneficiary can demonstrate hardship accessing other forms of disaster assistance or financing ~~or is a member of a protected class or other vulnerable group~~ while exceeding the LMI income limits

**Leveraging Funds.** RHC anticipates leveraging CDBG-DR funds with other sources of federal, State, local, and private funding to support mitigation upgrades to affordable housing as well as other public facilities and infrastructure. RHC's Mitigation Programs targeted to multi-family

affordable housing owner/operators and to units of local government or public service providers will both select projects and distribute funds using a competitive process that considers how requested CDBG-DR funds will enable applicants to successfully leverage other sources of funding.

In addition to the Mitigation Programs, RHC aims to support planning efforts by selected subrecipients to complete feasibility and engineering studies or produce comprehensive plans that help identify and prioritize community resiliency upgrades. RHC plans to also use planning dollars to provide technical assistance to support efforts by subrecipients to secure other funding sources for project that exceed the scope of funding available under this grant. Through these planning efforts, RHC intends to use CDBG-DR funds to maximize the leverage of available infrastructure and environmental funds by the communities impacted by Hurricane Ida.

To maximize the impact of the CDBG-DR funding provided to the State, and as part of a continuous effort to prevent duplication of benefits, there will be an ongoing commitment to identify and leverage other federal and non-federal funding sources. RHC will leverage existing relationships and strive to create new partnerships with other federal and State agencies, corporations, foundations, nonprofits, and other stakeholders as a means of utilizing all viable sources of funding.

In addition, per section IV.A.3 of the 5/22/24 Federal Register Notice, RHC may utilize grant funds from its previous PL 113-2 and PL 112-55 CDBG-DR allocations, as well as any future allocations, interchangeably and without limitation for the same activities related to unmet recovery needs from both Ida and these prior or future disasters, where the Most Impacted and Distressed areas for Ida and the prior or future allocations overlap, and when allowed by the HUD approved Action Plans for the prior or future allocations.

**Program Partners.** The State selects subrecipients to implement the IHRR program. Subrecipients and/or contractors implement the RSHI program.

**Distribution of Funds.** Each Program description in this Action Plan includes a section on the method of distribution for that Program. In addition, the connection of the Programs to the Unmet Needs Assessment is discussed in the “Connection to Unmet Needs” section above. Programs may be administered directly by RHC, through subrecipients, or through a hybrid model where RHC is the program administrator but assigns specific scopes of work to subrecipients to support RHC in the administration of the Program. When RHC plans to select and assign responsible entities to administer and deliver funded projects, the selection process and scoring priorities are outlined in the Program description.

Depending on updates to needs assessments, if any, and/or Program progress, RHC reserves the right to directly identify and select prospective subrecipients to carry out desired activities and approach them directly to determine their interest and suitability for the work. Direct selection may be pursued when one of the following criteria has been met:

- An entity is uniquely qualified due to having sole jurisdiction over a proposed project or complete control/ownership over a project site;
- There is reasonable basis to conclude that direct selection of a subrecipient will result in increased efficiencies and produce quicker results, thereby more quickly addressing the unmet need; or
- It can be reasonably concluded that the minimum needs of the project can only be satisfied by the selected subrecipient.

Regardless of whether RHC identifies potential subrecipients via a competitive process or direct outreach, all potential subrecipients are screened according to RHC's policies and procedures before making any final award decisions.

The Programs established in this Action Plan are not entitlement programs and are subject to available funding. RHC has determined all Program caps and incentives to be necessary and reasonable and for the general welfare of its recipients according to the intended Program objectives as outlined in this Plan.

**Program Income.** Program income has been defined as gross income directly generated from the use of CDBG-DR funds and received by a State, local government, Indian tribe, or subrecipient, less costs incidental to generation of the income and subject to de minimis thresholds, per the waivers in the May 24, 2022, Federal Register Notice. RHC does not anticipate any of the proposed uses will generate program income as part of the activities allowed under this allocation. Should any funds be generated, recovery of funds including program income, refunds, and rebates will be used in accordance with this Action Plan before drawing down additional CDBG-DR funds.

In the event any Program or subrecipient generates income, RHC will follow its program income policies and procedures accordingly

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

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

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

**b. Program Details.**

## Housing Program

**Renters Safe Housing Incentive**

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|---|---|---|---|---|
| Parent | P-21-NY-36-LDZ1 | $11,176,805.53~~24,828,808.00~~ | $ 10,059,124.98~~19,863,046.40~~ | $ 1,117,680.55~~4,965,761.60~~ |
| Child | B-21-DF-36-0001 | $ $11,176,805.53~~16,815,733.00~~ | $ 10,059,124.98~~13,452,586.40~~ | $ 1,117,680.55~~3,363,146.60~~ |

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|---|---|---|---|---|
| Child | B-22-DF-36-0001 | $ ~~8,013,075~~0.00 | $ ~~6,411,004.80~~0.00 | $ ~~1,602,070.20~~0.00 |

**Narratives**

- **Program Description**

  The Renters Safe Housing Incentive Program supports and encourages renters impacted by Ida relocating from sub-standard and/or storm-damaged units into safe permanent housing by providing Safe Housing incentives, homeownership assistance and/or relocation expenses. The Program provides applicants with assistance through the following CDBG-DR funded opportunities:

  - Rental Safe Housing Relocation Incentive: incentive award for relocating into safer replacement rental units to improve general welfare.
  - Safe Housing Homeownership Assistance: homeownership assistance to purchase permanent safe housing, including housing counseling and homebuyer education provided by HUD-approved housing counseling agencies; and
  - Moving Assistance: assistance with moving costs into replacement safe housing, either rental or homeownership.

- **Program Tieback to Disaster/Unmet Needs**

  Analysis of FEMA Individual Assistance (IA) data indicates that rental units were nearly six (6) times more likely than owner-occupied units to have experienced damage at the levels categorized “Major High” or “Severe” when able to complete the application and damage inspection process. However, while just over seventy percent (70%) of owner-occupant FEMA applicants successfully completed the inspection process, less than fifty percent (50%) of renter applicants were able to do so. Nearly forty percent (40%) of the renter applicants were unable to be contacted by FEMA for an inspection or were recorded as having missed the inspection. In contrast, just fourteen percent (14%) of owner occupant applicants were unable to be contacted or missed the inspection.

  The stark disparity in FEMA’s ability to successfully follow up with applicants to assess need points to the precarious situation renters experience more significantly than homeowners in their housing stability following a disaster. Renters may be required to relocate by their landlords even for damages that are less than “major” and lose the ability to demonstrate to an inspector how they were impacted. After being forced from their home by their landlord or the extent of the storm damage, renters also do not have the same incentive as homeowners to provide updated contact information and follow up

on inspection scheduling requests. Finally, as interviews with local community groups have confirmed, renters are significantly more likely than owners to be permanently, rather than temporarily, displaced due to storm damages. Nevertheless, FEMA rental assistance assumes relocation needs to be temporary.

As this quantitative and qualitative analysis demonstrates, renters experienced more severe losses than homeowners and also experienced greater permanent disruption in their housing while simultaneously receiving significantly less assistance from FEMA. As the group having the largest unmet needs, RHC is budgeting thirty six percent (36%) of the total grant allocation to respond to the burden of permanent relocation and severely damaged dwellings experienced by renters.

- **How Program will Promote Housing for Vulnerable Populations**

A majority of renters across the disaster-declared Counties are rent burdened, meaning monthly housing costs account for greater than thirty percent (30%) of household income, regardless of income level. In the most impacted and distressed area of Westchester County, median monthly housing costs are thirty-five percent (35%) of median renter household income according to 2020 U.S. Census data. Consequently, renters in these communities are routinely faced with a decision to either seek substandard housing that can be secured at a cost savings over median market rents or face extreme vulnerability to financial risk due to the imbalance in their income to housing cost ratio.

Hurricane Ida destabilized renters regardless of their above mentioned housing choice. Substandard housing, especially basement or garden apartments, sustained the most severe damage across the disaster-declared counties while financially vulnerable households lacked the resources to sustain additional expenses incurred due to disaster impacts. Faced with losing their home as a result of direct or indirect storm impacts, many renters may choose to relocate to more affordable communities outside of the disaster-declared counties. A permanent exodus of low- to moderate-income renters would leave the most impacted and distressed areas less diverse and less vibrant. Entire micro-communities across the region, but especially within Westchester County, would be at risk of disappearing.

By offering a housing incentive or homeownership assistance to remain within the State while securing safe, permanent housing, the Renters Safe Housing Incentive Program aims to respond to the particular destabilizing circumstances facing LMI and other renters which includes, vulnerable or historically disadvantaged protected class , improve the general welfare of these renters~~renters~~ and support the preservation of community through the disaster recovery period of reduced housing supply and increased costs.

In response to feedback received from community groups on barriers and challenges to accessing other forms of federal disaster aid experienced by renters especially, RHC intends to pursue flexible Program policies with respect to required documentation, streamlining and minimizing requirements where possible. Extremely low-income

households, including households that have additionally experienced loss of income due to either disruptions in housing, transportation, and/or employment and thus are most vulnerable to homelessness or are already experiencing homelessness, are eligible to receive the greatest incentives through the Program's policy of sizing incentives according to degree of rent burden related to annual income.

RHC and its subrecipients and/or contractors will coordinate with trusted community partners as well as do direct outreach to the renter population to advertise the Renters Safe Housing Incentive Program and assist renters with filling out applications. Application submissions and Program inquiries will be monitored for demographics and geography throughout the Program application period and RHC and its subrecipients and/or contractors may modify their outreach efforts if known ~~vulnerable and~~ impacted communities are underrepresented.

RHC will implement the RSHI program through contractors and/or subrecipients. This includes providing housing counseling through partnerships or referrals to HUD approved housing counseling agency partners for applicants seeking homeownership assistance.

In addition, RHC or its subrecipients and/or contractors will provide applicants with information and resources made available through HUD's Office of Housing Counseling, including a list of HUD-approved Housing Counseling Agencies and informational flyers. These resources can support and inform applicants on subjects such as eviction prevention, making consumers aware of scams, and preparing for future disasters, and will therefore serve to support long-term, equitable recovery for impacted renters.

- **Program Affordability Period (if applicable)**

- **Program Definition of Second Home/Eligibility**

  A second home is defined for purposes of the Renters Safe Housing Incentive Program as a home that was not the primary residence of the owner, tenant or any occupant at the time of the disaster. Second homes are not eligible for assistance under this Program.

- **Program National Objective(s)**

  **Primary Activity Type:** Safe housing incentives as described in Section II.B.8. of the Consolidated Notice (87 FR 31636); Homeownership assistance per Sec. 105 (a) (24) of the HCDA as modified by Section II.B.5 of the Consolidated Notice (87 FR 31636); Downpayment assistance per Sec. 105 (a) (8) of the HCDA; and Relocation Assistance per Sec. 105 (a) (11) of the HCDA

**Supporting Activity Type:** All eligible activities permitted under HCDA Section 105(a) and applicable waivers as needed to address the objectives of the Program

**National Objective:** Low- to Moderate- Income or Urgent Need

- **Program Eligibility**

  Households whose income is eighty percent (80%) or less than area median income (LMI) may be eligible to receive an award from the Renters Safe Housing Incentive Program. Applicants whose household income is 81-160% of AMI ~~and who are considered vulnerable populations or historically disadvantaged members of protected classes~~ may also be eligible. However, LMI applicants will be prioritized. Applicants whose household income exceeds 160% of AMI are not eligible.

  At a minimum, households must have rented their primary residence within a disaster-declared county at the time of Ida, must secure permanent housing within New York State, must relocate due to impacts of Hurricane Ida, and must not own their primary residence at the time of program application. Exceptions may be granted at the Program's discretion for permanent housing out of State.

  To be eligible for assistance under RSHI, applicants must demonstrate that their permanent housing meets the program's definition of "safe housing." This means that the housing:

  - Meets decent, safe, and sanitary standards;
  - Is located outside of the floodplain or, if in the floodplain, is elevated above base flood elevation;
  - If located in an area at risk for flooding similar to that of Hurricane Ida (including but not limited to, if the unit is known to have been damaged as a result of Hurricane Ida), the program will require documentation of the incorporation of industry-recognized flood prevention measures since the storm; and in the event that at least one full-time household member has a documented disability, the permanent housing must also include the reasonable accommodations needed.

Exceptions to Program standards and eligible expenses may be required to achieve program objectives, and the exceptions review and approval processes will be further detailed in program guidelines.

- **Program Responsible Entity**

  RHC directly administers the Renters Safe Housing Incentive Program, including through the use of subrecipients and/or contractors.

- **Program Maximum Assistance**

The maximum assistance for an applicant through this Program is $50,000. Eligible applicants may switch between the Rental Safe Housing Relocation Incentive and Safe Housing Homeownership Assistance components, but their total award between the two may not exceed the $50,000 maximum assistance. Households with accessibility needs may exceed the maximum assistance to allow for reasonable accommodation. Households able to show a demonstrable hardship as defined in the General Requirements section of this plan may also be eligible for an exception to the Program's maximum assistance. Moving assistance does not count towards the $50,000 maximum assistance.

*Rental Safe Housing Relocation Incentive:*

The maximum incentive available to an applicant is the Program maximum of $50,000.

*Safe Housing Homeownership Assistance*

The maximum award for the homeownership assistance program is $50,000. Maximum home purchase prices will be set by the program and are dependent on county. Awards for applicants above 120% AMI are limited to downpayment assistance.

*Moving Assistance*

The Moving Assistance award calculation is detailed in the Program's Policy Manual. Moving assistance does not count towards the $50,000 maximum assistance.

- **Program Estimated Begin and End Dates**

  RHC anticipates that the program will begin in the last calendar quarter of 2022, after HUD has approved the Public Action Plan.

  The program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or 6 years after execution of the grant agreement with HUD.

- **Other Program Details**

  RHC will establish Resilience Performance Metrics for the Program before carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures.

- **Program Competitive Application Overview (if applicable)**

RHC will select subrecipients and/or contractors for implementation of the Renters Safe Housing Initiative, through competitive and advertised Requests for Proposals (RFP) and/or NOFAs. Eligible applicants who propose to provide housing counseling services must be

HUD-approved housing counseling agencies (HCAs) or must partner with HUD-approved HCAs. Contractors procured directly by RHC for the Program will be selected in accordance with HTFC's Procurement Guidelines.

RHC may advertise a single competitive RFP and/or NOFA or may publish multiple competitive rounds depending on responses and the available budget. All responses received in response to a published RFP or NOFA will be reviewed, scored, ranked, and awarded based on a score.

The criteria used to select subrecipients to support the RSHI program are:

1. Capacity and Experience

2. Staffing Expertise

3. Approach and Methodology

4. Commitment to Compliance

5. Collaboration and Capacity Building

- **Program Method of Distribution Description/Overview (if applicable)**

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

  Not Applicable

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

**Projection of Expenditures**

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2024 | $ 620,933.64~~1,379,378.22~~ | $0.00 | $620,933.64 ~~$ 1,379,378.22~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2024 | $ 620,933.64 ~~1,379,378.22~~ | $0.00 | $1,241,867.28 ~~$ 2,758,756.44~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2025 | $ 620,933.64~~1,379,378.22~~ | $0.00 | $1,862,800.92 ~~$ 4,138,134.67~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $2,483,734.56 ~~$ 5,517,512.89~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $3,104,668.20 ~~$ 6,896,891.11~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $3,725,601.84 ~~$ 8,276,269.33~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $4,346,535.48 ~~$ 9,655,647.56~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $4,967,469.12 ~~$ 11,035,025.78~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $5,588,402.76 ~~$ 12,414,404.00~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $6,209,336.40 ~~$ 13,793,782.22~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $6,830,270.04 ~~$ 15,173,160.44~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $7,451,203.68 ~~$ 16,552,538.67~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $8,072,137.32 ~~$ 17,931,916.89~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $8,693,070.96 ~~$ 19,311,295.11~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $9,314,004.60 ~~$ 20,690,673.33~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $9,934,938.24 ~~$ 22,070,051.56~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $10,555,871.88 ~~$ 23,449,429.78~~ | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 10/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 | $11,176,805.52 ~~$ 24,828,808.00~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2024 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $620,933.64 ~~$ 1,379,378.22~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2024 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $1,241,867.28 ~~$ 2,758,756.44~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $1,862,800.92 ~~$ 4,138,134.67~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $2,483,734.56 ~~$ 5,517,512.89~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $3,104,668.20 ~~$ 6,896,891.11~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2025 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $3,725,601.84 ~~$ 8,276,269.33~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $4,346,535.48 ~~$ 9,655,647.56~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $4,967,469.12 ~~$ 11,035,025.78~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $5,588,402.76 ~~$ 12,414,404.00~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2026 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $6,209,336.40 ~~$ 13,793,782.22~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $6,830,270.04 ~~$ 15,173,160.44~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $7,451,203.68 ~~$ 16,552,538.67~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $8,072,137.32 ~~$ 17,931,916.89~~ | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| B-21-DF-36-0001 | 10/01/2027 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $8,693,070.96 ~~$ 19,311,295.11~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $9,314,004.60 ~~$ 20,690,673.33~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $9,934,938.24 ~~$ 22,070,051.56~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $10,555,871.88 ~~$ 23,449,429.78~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2028 | $ 620,933.64 ~~$ 1,379,378.22~~ | $0.00 ~~$0.00~~ | $11,176,805.52 ~~$ 24,828,808.00~~ | $0.00 |

**Projection of Outcomes**

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 04/01/2023 | # of Properties | 0 | 0 | 0 | 0 |
| 07/01/2023 | # of Properties | 0 | 0 | 0 | 0 |
| 10/01/2023 | # of Properties | 0 | 0 | 0 | 0 |
| 01/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 04/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 07/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 10/01/2024 | # of Properties | 0 ~~10~~ | 0 | 0 ~~10~~ | 0 |
| 01/01/2025 | # of Properties | 0 ~~30~~ | 0 | 0 ~~40~~ | 0 |
| 04/01/2025 | # of Properties | 0 ~~30~~ | 0 | 0 ~~70~~ | 0 |
| 07/01/2025 | # of Properties | 0 ~~30~~ | 0 | 0 ~~100~~ | 0 |
| 10/01/2025 | # of Properties | 0 ~~30~~ | 0 | 0 ~~130~~ | 0 |
| 01/01/2026 | # of Properties | 0 ~~30~~ | 0 | 0 ~~160~~ | 0 |
| 04/01/2026 | # of Properties | ~~30~~ 25 | 0 | 25~~190~~ | 0 |
| 07/01/2026 | # of Properties | 25~~30~~ | 0 | 50~~220~~ | 0 |
| 10/01/2026 | # of Properties | 25~~30~~ | 0 | 75~~250~~ | 0 |
| 01/01/2027 | # of Properties | 25~~30~~ | 0 | 100~~280~~ | 0 |
| 04/01/2027 | # of Properties | 25~~30~~ | 0 | 125~~310~~ | 0 |
| 07/01/2027 | # of Properties | 25~~30~~ | 0 | 150~~340~~ | 0 |
| 10/01/2027 | # of Properties | 25~~30~~ | 0 | 175~~370~~ | 0 |

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 01/01/2028 | # of Properties | 25~~30~~ | 0 | 200~~400~~ | 0 |

**Ida Homeowner Repair and Reimbursement**

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|---|---|---|---|---|
| Parent | P-21-NY-36-LDZ1 | $12,936,244.77~~15,706,777.00~~ | $10,348,995.82~~12,565,421.60~~ | $2,587,248.95~~3,141,355.40~~ |
| Child | B-21-DF-36-0001 | $ 12,936,244.77~~8,193,867.00~~ | $ 10,348,995.82~~6,555,093.60~~ | $ 2,587,248.95~~1,638,773.40~~ |
| Child | B-22-DF-36-0001 | $~~7,512,91~~0.00 | $~~6,010,328~~0.00 | $~~1,502,582~~0.00 |

**Narratives**

- **Program Description**

  The Ida Homeowner Repair and Reimbursement Program provides assistance in the form of repairs to storm-impacted owner-occupied residential properties and/or reimbursement for out-of-pocket costs, or costs paid by a subsidized loan covered by the DRRA exception- for previously completed Hurricane Ida- related residential property repairs. Eligible applicants may receive both reimbursement and prospective repair awards, or just one or the other, depending on eligible repair/reimbursement needs. The Program additionally provides measures to improve resilience to flood inundation and to mitigate the impacts of future floods on habitability.

  At the Program's discretion, funding may be provided to projects involving the new construction of housing, including the addition of housing units, but assistance will be based on the original footprint, square footage and number of units of the original structure.

- **Program Tieback to Disaster/Unmet Needs**

  Housing is the largest category of unmet need facing the disaster-declared counties at approximately 60% of the total estimated need, including resiliency costs. While renters are understood to have a greater overall need as discussed in relation to the Renters Safe

Housing Incentive, homeowners – and especially low- to moderate-income homeowners – are also facing unmet needs and barriers to other sources of recovery assistance.

Homeowners whose disaster recovery needs are not fully met by FEMA IA can often have those unmet needs addressed by subsidized loans from the U.S. Small Business Administration (SBA) or insurance. Low- to moderate-income homeowners are less likely to be able to qualify for a loan from SBA. Additionally, while the greatest flood depths from Hurricane Ida occurred within the mapped 100-year floodplain, the extreme rainfall from Hurricane Ida caused stormwater systems to be overwhelmed, resulting in flooding unrelated to mapped riverine or coastal hazards. Homeowners outside of mapped floodplains, especially homeowners of limited or modest financial resources, are unlikely to hold flood insurance on their properties and therefore were unable to access insurance proceeds to respond to damages incurred.

The Ida Homeowner Repair and Reimbursement Program is intended to assist homeowners whose low- to moderate-income or other social vulnerabilities impeded their ability to access other sources of recovery assistance in order to fully repair their homes.

- **How Program will Promote Housing for Vulnerable Populations**

The Ida Homeowner Repair and Reimbursement Program promotes housing for vulnerable populations by ~~targeting~~ identifying the need for assistance to individuals whose remaining unmet needs are most likely due to known structural inequalities of the federal disaster assistance framework. That framework assumes homeowners are fully insured against all hazards, have the financial standing to qualify for an SBA loan, and the capability to select, hire, and oversee quality contractors to complete the needed repairs in their homes.

Low- and moderate-income households and other vulnerable populations are the least likely to have these resources and capabilities. In the most impacted and distressed area of Westchester County, median home values exceed $500,000, meaning these groups' most significant asset is their home and barriers to full disaster rehabilitation present a realistic risk to not only the home's continued habitability but also the devaluation of the asset resulting in an inability to secure alternate permanent housing.

The Program prioritizes assistance to low- to moderate-income applicants and ensures successful project completion by vetting potential contractors competitively selected by Applicants, which includes assisting with construction contract approval and reviewing contractor qualifications

After selecting a contractor, Applicants sign a Contract with the contractor which includes Program clauses allowing for Program oversight of construction, Program disbursement of payments to the contractor, and required contractor warranties. All eligible Program applicants receiving prospective repair awards will additionally receive mitigation measures intended to prevent the same type of damages occurring from future events. Risks of becoming homeless will be mitigated by improving the physical

condition and resilience of the home to future floods, thereby preserving health, safety, and the financial stability of homeownership. In addition, RHC and/or its subrecipients will provide applicants, especially any who may be at immediate risk of losing their home, with information and resources made available through HUD's Office of Housing Counseling, including a list of HUD-approved Housing Counseling Agencies that may be able to provide foreclosure prevention assistance and other informational flyers on subjects such as making consumers aware of scams, and preparing for future disasters.

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

- **Program Affordability Period (if applicable)**

  Not Applicable

- **Program Definition of Second Home/Eligibility**

  A second home is defined for purposes of the Ida Homeowner Repair and Reimbursement Program as a home that was not the primary residence of the owner at the time of the disaster. Second homes are not eligible for assistance under this Program.

- **Program National Objective(s)**

  **Primary Activity Type:** Repair, reconstruction, and mitigation of residential structures as described in HCDA Section 105(a)(4)

  **Supporting Activity Type:** All eligible activities permitted under HCDA Section 105(a) and applicable waivers, including new construction of housing per Section II.B.1 of the Consolidated Notice at 87 FR 31636, as needed to complete Program projects

  **National Objective:** Low- to Moderate- Income or Urgent Need

- **Program Eligibility**

  Eligibility for the Ida Homeowner Repair and Reimbursement Program is limited to one (1) to four (4) unit residences located within the disaster declared counties. The

residential property ~~-~~must have sustained damage as a result of the storm. In addition, the home must have been the property owner's primary residence at the time of the storm.

~~Applicants to the Program~~Eligible program applicants are property owners holding fee-simple title to the subject impacted property or otherwise can prove ownership of the impacted structure/property. Condominium ~~P~~property owners ~~within condominium associations~~ or housing cooperatives are not eligible. Eligibility is further limited to households whose income is one-hundred and sixty~~eighty~~ percent (160~~80~~%) or less than area median income ~~(LMI) or are otherwise considered vulnerable populations or historically disadvantaged members of protected classes~~. Priority processing shall~~will~~ be given to LMI applicants followed by non-LMI applicants below 120% AMI ~~who are members of vulnerable or historically disadvantaged groups,~~ on a first come, first served basis. Applicants ~~above~~ with income equal to 120-160% AMI ~~who are members of these groups~~ may also be served if funds remain available, from lowest to highest income~~.~~, subject to the Overall Benefit requirement to spend 70% of grant funds to benefit LMI persons.

Exceptions to Program standards and eligible expenses may be required to achieve program objectives, and the exceptions review and approval processes will be further detailed in program guidelines.

- **Program Responsible Entity**

  RHC directly administers the Ida Homeowner Repair and Reimbursement Program through one or more subrecipients.

- **Program Maximum Assistance**

  The maximum amount of assistance available to an applicant is:

  - $50,000 per unit for prospective repairs. In lieu of direct payments to homeowners, RHC intends to provide this assistance in the form of repairs and resilience upgrades performed by applicant selected construction contractors who are vetted by the Program.
  - $30,000 per unit for reimbursement of repairs paid for prior to Program Application, including reimbursement of eligible costs paid for with a subsidized loan, such as an SBA loan, covered by the DRRA exception ~~as well as outstanding interest for those loans~~.
  - The cap for mitigation measures is $45,000. In cases where an applicant paid for mitigation measures prior to Program Application, these costs may be reimbursed to the applicant up to the $45,000 cap.

  Some types of award costs will be treated differently for the purpose of calculating maximum assistance:

- Installation of and/or repair to reasonable accommodations are included in the repair scope for all applicants having at least one full-time household member with a documented disability and may result in an award that exceeds the maximum amount of assistance.
- Environmental remediation costs are calculated separately and do not count towards the award cap.
- Design fees for prospective repairs do not count towards an applicant's maximum assistance

Other exceptions to the maximum award include

- In the event that competitively sourced contractor bids for a specific applicant scope of work exceeds the maximum amount of assistance, RHC or its subrecipients may elect to make an exception to the maximum and proceed with the lowest responsible bidder. The Program may also elect to revise the project scope and require new contractor bids.
- RHC will also make an exception to the maximum award when change orders due to unforeseen conditions uncovered after bid award result in the total project cost exceeding $50,000 per unit.
- Applicants whose residence has been determined to be substantially damaged by the local jurisdiction's Flood Plain Manager or requiring repairs in excess of fifty percent (50%) of the structure value may receive additional assistance up to the full reconstruction of the home provided the applicant has been unable to obtain other sources of assistance commensurate with RHC's determination of rehabilitation need. Where reconstruction, rehabilitation of substantial damage or substantial improvements require mandatory elevation, the Program assistance shall not exceed $400,000 for the repair, reconstruction or reimbursement scope. In cases where the Program determines reconstruction to be more cost-effective than repairs, the Program will fund reconstruction.
- Manufactured home replacement awards are capped at $100,000 for single and $200,000 for double-wide homes. Applicants eligible for a manufactured home replacement will receive a replacement home that is comparable in footprint to their damaged property, with standard finishes.
- Demonstrable hardship, as defined under the general requirements section of the Action Plan.
- All exceptions to the Program maximum award will be reviewed according to Program policies and procedures prior to being awarded. If approved, any other repair or reconstruction costs in excess of the allowed cap amount are the responsibility of the Applicant.

- **Program Estimated Begin and End Dates**

RHC anticipates that the program will begin in the last calendar quarter of 2022, after HUD has approved the Public Action Plan.

The program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or six (6) years after execution of the grant agreement with HUD.

- **Other Program Details**

  RHC will establish Resilience Performance Metrics for the Program before carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures.

- **Program Competitive Application Overview (if applicable)**

  RHC will select one or more subrecipients to implement the Ida Homeowner Repair and Reimbursement program, as described above, through a competitive and advertised Notice of Funding Availability (NOFA). Eligible respondents are non-profit housing developers, registered to do business in New York State, capable of completing work in one or more eligible counties (Nassau, Orange, Rockland, Suffolk, and Westchester Counties).

  RHC may advertise a single competitive NOFA or may publish multiple competitive rounds depending on responses and the available budget. All responses received in response to a published NOFA will be reviewed, scored, ranked, and awarded based on a score.

  The criteria used to select subrecipients to implement the IHRR program are:

  1. Capacity and Experience (maximum of 30 points)

  2. Staffing Expertise (maximum of 25 points) and Cost

  3. Approach and Methodology (maximum of 25 points)

  4. Commitment to Compliance (maximum of 10 points)

  5. Collaboration and Capacity Building (maximum of 10 points)

- **Program Method of Distribution Description/Overview (if applicable)**

  Not applicable

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

  Not applicable

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

**Projection of Expenditures**

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2024 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $718,680.27 ~~$ 872,598.72~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2024 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $1,437,360.53 ~~$ 1,745,197.44~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $2,156,040.80 ~~$ 2,617,796.17~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $2,874,721.06 ~~$ 3,490,394.89~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $3,593,401.33 ~~$ 4,362,993.61~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $4,312,081.59 ~~$ 5,235,592.33~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $5,030,761.86 ~~$ 6,108,191.06~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $5,749,442.12 ~~$ 6,980,789.78~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $6,468,122.39 ~~$ 7,853,388.50~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $7,186,802.65 ~~$ 8,725,987.22~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2027 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $7,905,482.92 ~~$ 9,598,585.94~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2027 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $8,624,163.18 ~~$ 10,471,184.67~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2027 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $9,342,843.45 ~~$ 11,343,783.39~~ | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 10/01/2027 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $10,061,523.71 ~~$ 12,216,382.11~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2028 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $10,780,203.98 ~~$ 13,088,980.83~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2028 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $11,498,884.24 ~~$ 13,961,579.56~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2028 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $12,217,564.51 ~~$ 14,834,178.28~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2028 | $718,680.27 ~~$ 872,598.72~~ | $0.00 | $12,936,244.77 ~~$ 15,706,777.00~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2024 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $718,680.27 ~~$ 872,598.72~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2024 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $1,437,360.53 ~~$ 1,745,197.44~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $2,156,040.80 ~~$ 2,617,796.17~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $2,874,721.06 ~~$ 3,490,394.89~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $3,593,401.33 ~~$ 4,362,993.61~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2025 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $4,312,081.59 ~~$ 5,235,592.33~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $5,030,761.86 ~~$ 6,108,191.06~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $5,749,442.12 ~~$ 6,980,789.78~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2026 | $718,680.27 ~~$ 872,598.72~~ | $0.00 ~~$0.00~~ | $6,468,122.39 ~~$ 7,853,388.50~~ | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| B-21-DF-36-0001 | 10/01/2026 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $7,186,802.65 ~~$8,725,987.22~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2027 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $7,905,482.92 ~~$9,598,585.94~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2027 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $8,624,163.18 ~~$10,471,184.67~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2027 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $9,342,843.45 ~~$11,343,783.39~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2027 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $10,061,523.71 ~~$12,216,382.11~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2028 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $10,780,203.98 ~~$13,088,980.83~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2028 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $11,498,884.24 ~~$13,961,579.56~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2028 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $12,217,564.51 ~~$14,834,178.28~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2028 | $718,680.27 ~~$872,598.72~~ | $0.00 ~~$0.00~~ | $12,936,244.77 ~~$15,706,777.00~~ | $0.00 |

**Projection of Outcomes**

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 04/01/2023 | # of Properties | 0 | 0 | 0 | 0 |
| 07/01/2023 | # of Properties | 0 | 0 | 0 | 0 |
| 10/01/2023 | # of Properties | 0 | 0 | 0 | 0 |
| 01/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 04/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 07/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 10/01/2024 | # of Properties | 0 | 0 | 0 | 0 |
| 01/01/2025 | # of Properties | 0 | 0 | 0 | 0 |
| 04/01/2025 | # of Properties | 0 | 0 | 0 | 0 |
| 07/01/2025 | # of Properties | 0 | 0 | 0 | 0 |
| 10/01/2025 | # of Properties | 0 | 0 | 0 | 0 |
| 01/01/2026 | # of Properties | ~~22~~ 0 | 0 | ~~22~~0 | 0 |

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 04/01/2026 | # of Properties | ~~30~~ 21 | 0 | ~~52~~ 21 | 0 |
| 07/01/2026 | # of Properties | 21~~30~~ | 0 | ~~82~~ 42 | 0 |
| 10/01/2026 | # of Properties | 21~~30~~ | 0 | ~~112~~ 63 | 0 |
| 01/01/2027 | # of Properties | 21~~30~~ | 0 | ~~142~~ 84 | 0 |
| 04/01/2027 | # of Properties | 20~~30~~ | 0 | ~~172~~ 104 | 0 |
| 07/01/2027 | # of Properties | ~~30~~ 0 | 0 | ~~202~~ 150 | 0 |
| 10/01/2027 | # of Properties | ~~30~~ 0 | 0 | ~~232~~ 150 | 0 |
| 01/01/2028 | # of Properties | ~~30~~ 0 | 0 | ~~262~~ 150 | 0 |

## Buyout Program

No Grantee Program(s)

## Infrastructure Program

No Grantee Program(s)

## Economic Revitalization Program

No Grantee Program(s)

## Public Facilities Program

No Grantee Program(s)

## Public Services Program

No Grantee Program(s)

## Mitigation Program

### Affordable Housing Resiliency Initiative

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|---|---|---|---|---|
| Parent | P-21-NY-36-LDZ1 | $14,046,815.00 | $9,973,238.65~~14,046,815~~ | $4,073,576.35~~0.00~~ |
| Child | B-21-DF-36-0001 | $2,968,000.00~~8,000,000.00~~ | $~~8,000,000~~211,112.97~~.00~~ | $2,756,887.03.00~~0.00~~ |
| Child | B-22-DF-36-0001 | $11,078,815.00~~6,046,815.00~~ | $9,973,238.65~~6,046,815.00~~ | $1,105,576.35~~0.00~~ |

**Narratives**

- **Program Description**

  The Affordable Housing Resiliency Initiative Program provides CDBG-DR funds to owners of regulated multifamily housing, including but not limited to public housing entities, housing developers, nonprofit entities, not-for-profit associations, condominium or cooperative boards, or units of local government to support the completion of site-specific mitigation projects that will improve the resilience of multi-family affordable and/or public housing developments against identified hazards or repetitive loss events. Program assistance may also support projects involving new construction of housing to add new mitigated units at existing multi-family affordable housing sites or the construction of new affordable housing developments that are mitigated against anticipated hazards.

- **How will Program Meet Definition of Mitigation**

  To be eligible for funding consideration, a proposed project must include the construction or installation of features that are designed specifically to enable residences to remain

safely habitable in the event of an anticipated future disaster. Residences serving special needs populations must be able to maintain designed accommodations and support systems to meet the Program's definition of safely habitable. By requiring projects to be built to a level that enables safe sheltering in place throughout an anticipated hazard, the risk of loss of life is significantly reduced.

- **How will Program Address Current & Future Risks/Mitigation Needs Assessment**

  Project proposals must identify at least one hazard risk the proposed project is designed in response to. The proposal should describe both the frequency and severity of the hazard in order to establish a resilience threshold that the project is designed to achieve. The description of risk and the resulting resilience threshold will be evaluated for alignment with RHC's mitigation needs assessment and the local jurisdiction's hazard mitigation plan. Projects having greater alignment with the greatest risks and needs identified in those efforts will be scored more highly in the evaluation process.

- **Program Tieback to Disaster/Unmet Needs (if applicable)**

  Prior to Hurricane Ida, Westchester County identified a severe shortcoming in the availability of affordable housing of all types. Existing affordable housing, especially deeply affordable housing, has a tendency to be older construction and localized in areas of the County prone to disaster impacts, either due to topography or historical shortcomings in municipal infrastructure investment. These properties are more likely to have been damaged by Hurricane Ida or to experience repetitive losses from recurring heavy rain events.

  In addition, many of the County's public housing authorities have leveraged private conversion financing in order to maintain and modernize their aging property portfolios. These efforts, however, have left the properties excluded from most of the typical sources of disaster recovery assistance. The unmet needs at these properties are therefore far greater than is typical of public housing that has not pursued conversion financing.

  A focus on site-specific mitigation measures at these properties responds not only to the specific unmet needs from Hurricane Ida but addresses the more systemic vulnerability to disaster-related losses and recent experience of less than proportionate disaster recovery assistance. More resilient sites will incur less frequent and less costly losses over time.

- **Program National Objective(s)**

  **Primary Activity Type:** Mitigation and repair of affordable housing as described in HCDA Section 105(a)(4)

  **Supporting Activity Type:** All eligible activities permitted under HCDA Section 105(a) and applicable waivers, including new construction of housing per Section II.B.1 of the Consolidated Notice at 87 FR 31636, as needed to complete Program projects

**National Objective:** Low- to Moderate-Income or Urgent Need

- **Program Eligibility**

Proposed projects must be located on sites that include or will build one or more residential structures and the total number of occupiable dwellings at the conclusion of the project is no less than five (5). The development site must be located within one of the disaster-declared counties. Existing residences must be managed by a public housing authority or must otherwise be able to demonstrate at least 51% of the units are occupied by low- and moderate-income persons. Each existing site must be subject to an existing regulatory agreement or other legal requirement limiting occupancy of a portion of units to LMI households at affordable rates. Awardees for the program can include public housing authorities, housing developers, nonprofit and not-for-profit entities, condominium or cooperative boards, units of local government, or a consortium of any of the above.

Proposed projects must include tangible upgrades that will improve the overall resilience of the site to the impacts of an identified disaster risk. Sites do not need to have sustained damage from the remnants of Hurricane Ida in order to be eligible for this Program; however, projects that respond to damages incurred by Hurricane Ida or existing conditions exacerbated by Hurricane Ida may receive higher scores. The total development project may include repairs already completed or remaining rehabilitation of storm damages and/or repetitive losses in addition to dedicated mitigation measures. At a minimum, projects must be able to demonstrate residences will remain habitable and capable of providing all designed supportive services without interruption throughout the duration of the risk event the project is proposed to mitigate against.

At the conclusion of the project, at least 51% of units must be occupied by LMI households who earn 80% or less of area median income. LMI households must have monthly rent affordable to them, as defined in the building's pre-existing regulatory agreement/affordability requirements.

For new construction of housing, the building's regulatory agreement must require affordability standards which at minimum meet the requirements of section II.B.3 of the Consolidated Notice at 87 FR 31636. The site's affordability period must be for a minimum of 20 years. For projects that involve other sources of HUD funding, such as Section 8 Project Based Vouchers, the project must meet the affordability standards, rents and affordability period of the other HUD source of funding. Enforcement of these affordability requirements will be undertaken by the NYS HCR agency providing the additional source of HUD funding.

- **Program Responsible Entity**

RHC directly administers the Affordable Housing Resiliency Initiative Program and makes project-specific grant awards and/or loans to successful Program applicants or identified subrecipients.

- **Program Maximum Assistance**

  RHC may award funds up to $3,000,000 per project. The awarded grant and/or loan may or may not fully fund the proposed project. When the award is less than the total development cost, the amount of CDBG-DR funds awarded will be sized based on the estimated cost of the mitigation elements compared to the estimated total development cost in addition to the score the project received according to the competitive application criteria. Projects receiving the highest available scores across all categories are most likely to be fully funded by the Program up to the maximum award amount.

  In the event the total development cost for a project exceeds the Program maximum and the project owner is unable to access alternate financing for the gap, RHC may elect to make an exception to the maximum award in order to allow the project to proceed. Exceptions will be evaluated on a case-by-case basis and may include providing technical assistance to the project owner with the objective of securing alternate gap financing prior to RHC authorizing an exception to the maximum award.

  Exceptions to Program standards and eligible expenses may be required to achieve program objectives, and the exceptions review and approval processes will be further detailed in program guidelines.

- **Program Estimated Begin and End Dates**

  RHC anticipates that the program will begin in the last calendar quarter of 2022, after HUD has approved the Public Action Plan.

  The program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or six (6) years after execution of the grant agreement with HUD.

- **Other Program Details**

  RHC will establish Resilience Performance Metrics for the Program before carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures.

- **Program Competitive Application Overview (if applicable)**

  Affordable Housing Resiliency Initiative Program funds are made available through competitive and advertised Notices of Funding Availability (NOFAs). RHC may advertise a single competitive NOFA or may publish multiple competitive rounds depending on Program responses and the available budget. All applications received in response to a published NOFA will be reviewed, scored, ranked, and awarded based on a

score. As discussed in the "Distribution of funds" section above, RHC reserves the right to identify and select projects and subrecipients outside of the NOFA process. ~~A~~ When selecting projects through the NOFA process, RHC will establish a minimum threshold score to ensure that high-quality projects are selected. Scoring priorities will include, but are not limited to, the following:

1. Readiness to Proceed - How quickly can a project move from award to construction? Has the recipient demonstrated capacity to perform similar projects?
2. Development Team Experience & Capacity- Does the applicant and its partners have demonstrated capacity to implement the project and previous experience managing resilience and mitigation projects?

3. Affordability & Access – Will the project serve Low-to Moderate-Income households? How will the project further prioritize housing vulnerable populations?
4. Connection to Mitigation Needs: How does the project specifically respond to the mitigation needs of the local jurisdiction, County, and New York State? Is the hazard being addressed a high risk according to current adopted Hazard Mitigation Plans?
5. Minimize Displacement - How is the project minimizing tenant relocation and/or displacement in accordance with the objectives of RHC's Residential Anti-displacement and Relocation Assistance Plan (RARAP)? Are identified relocation needs adequately addressed in the proposed budget?
6. Nexus to the Storm: How does the project specifically respond to the unmet needs associated with Hurricane Ida? For instance:

   1. Was the project property/site directly impacted by Hurricane Ida?
   2. Is the project located within an area impacted by Hurricane Ida?
   3. Does the project represent a community-wide improvement associated with the impacts of Hurricane Ida?

7. Cost Reasonableness: Does the project demonstrate clear use of funds, including additional sources of funding and long-term financing? Are costs and estimates substantiated and reasonable?

- **Program Method of Distribution Description/Overview (if applicable)**

  Not Applicable

**Projection of Expenditures**

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2024 | $ 780,378.61 | $0.00 | $ 780,378.61 | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2024 | $ 780,378.61 | $0.00 | $ 1,560,757.22 | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2025 | $ 780,378.61 | $0.00 | $ 2,341,135.83 | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2025 | $ 780,378.61 | $0.00 | $ 3,121,514.44 | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2025 | $ 780,378.61 | $0.00 | $ 3,901,893.06 | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2025 | $ 780,378.61 | $0.00 | $ 4,682,271.67 | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2026 | $ 780,378.61 | $0.00 | $ 5,462,650.28 | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2026 | $ 780,378.61 | $0.00 | $ 6,243,028.89 | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2026 | $ 780,378.61 | $0.00 | $ 7,023,407.50 | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2026 | $ 780,378.61 | $0.00 | $ 7,803,786.11 | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2027 | $ 780,378.61 | $0.00 | $ 8,584,164.72 | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2027 | $ 780,378.61 | $0.00 | $ 9,364,543.33 | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2027 | $ 780,378.61 | $0.00 | $ 10,144,921.94 | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 10/01/2027 | $ 780,378.61 | $0.00 | $ 10,925,300.56 | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2028 | $ 780,378.61 | $0.00 | $ 11,705,679.17 | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2028 | $ 780,378.61 | $0.00 | $ 12,486,057.78 | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2028 | $ 780,378.61 | $0.00 | $ 13,266,436.39 | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2028 | $ 780,378.61 | $0.00 | $ 14,046,815.00 | $0.00 |
| B-21-DF-36-0001 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2024 | $ 780,378.61 | $0.00 | $ 780,378.61 | $0.00 |
| B-21-DF-36-0001 | 10/01/2024 | $ 780,378.61 | $0.00 | $ 1,560,757.22 | $0.00 |
| B-21-DF-36-0001 | 01/01/2025 | $ 780,378.61 | $0.00 | $ 2,341,135.83 | $0.00 |
| B-21-DF-36-0001 | 04/01/2025 | $ 780,378.61 | $0.00 | $ 3,121,514.44 | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| B-21-DF-36-0001 | 07/01/2025 | $ 780,378.61 | $0.00 | $ 3,901,893.06 | $0.00 |
| B-21-DF-36-0001 | 10/01/2025 | $ 780,378.61 | $0.00 | $ 4,682,271.67 | $0.00 |
| B-21-DF-36-0001 | 01/01/2026 | $ 780,378.61 | $0.00 | $ 5,462,650.28 | $0.00 |
| B-21-DF-36-0001 | 04/01/2026 | $ 780,378.61 | $0.00 | $ 6,243,028.89 | $0.00 |
| B-21-DF-36-0001 | 07/01/2026 | $ 780,378.61 | $0.00 | $ 7,023,407.50 | $0.00 |
| B-21-DF-36-0001 | 10/01/2026 | $ 780,378.61 | $0.00 | $ 7,803,786.11 | $0.00 |
| B-21-DF-36-0001 | 01/01/2027 | $ 780,378.61 | $0.00 | $ 8,584,164.72 | $0.00 |
| B-21-DF-36-0001 | 04/01/2027 | $ 780,378.61 | $0.00 | $ 9,364,543.33 | $0.00 |
| B-21-DF-36-0001 | 07/01/2027 | $ 780,378.61 | $0.00 | $ 10,144,921.94 | $0.00 |
| B-21-DF-36-0001 | 10/01/2027 | $ 780,378.61 | $0.00 | $ 10,925,300.56 | $0.00 |
| B-21-DF-36-0001 | 01/01/2028 | $ 780,378.61 | $0.00 | $ 11,705,679.17 | $0.00 |
| B-21-DF-36-0001 | 04/01/2028 | $ 780,378.61 | $0.00 | $ 12,486,057.78 | $0.00 |
| B-21-DF-36-0001 | 07/01/2028 | $ 780,378.61 | $0.00 | $ 13,266,436.39 | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| B-21-DF-36-0001 | 10/01/2028 | $ 780,378.61 | $0.00 | $ 14,046,815.00 | $0.00 |

**Projection of Outcomes**

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 04/01/2023 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 07/01/2023 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 10/01/2023 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 01/01/2024 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 04/01/2024 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 07/01/2024 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 10/01/2024 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 01/01/2025 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 04/01/2025 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 07/01/2025 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 10/01/2025 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 01/01/2026 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 04/01/2026 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 07/01/2026 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 10/01/2026 | # of residents protected from future flooding | 0 | 0 | 0 | 0 |
| 01/01/2027 | # of residents protected from future flooding | 60 | 0 | 60 | 0 |
| 04/01/2027 | # of residents protected from future flooding | 60 | 0 | 120 | 0 |
| 07/01/2027 | # of residents protected from future flooding | 60 | 0 | 180 | 0 |
| 10/01/2027 | # of residents protected from future flooding | 60 | 0 | 240 | 0 |
| 01/01/2028 | # of residents protected from future flooding | 60 | 0 | 300 | 0 |

**Resilient Investments through Support and Capital**

| Grant Type | Grant Number | Proposed Budget | Proposed HUD-Identified MID Budget | Proposed Grantee-Identified MID Budget |
|---|---|---|---|---|
| Parent | P-21-NY-36-LDZ1 | $24,719,351.708,296,817.00 | $22,029,424.947,467,135.30 | $2,689,926.76829,681.70 |
| Child | B-21-DF-36-0001 | $ 11,617,849.704,251,917.00 | $10,339,886.23$ 3,826,725.30 | $ 1,277,963.47425,191.70 |
| Child | B-22-DF-36-0001 | $ 13,101,502.004,044,900.00 | $11,660,336.783,640,410.00 | $1,441,165.22404,490.00 |

**Narratives**

- **Program Description**

  The Resilient Investments through Support and Capital Program includes two components: RISC-Planning and RISC-Infrastructure. RISC-Planning provides CDBG-DR funds to units of local government, public entities, or not-for-profit and non-profit organizations in order to fully leverage other funding sources, including subrecipient capital funds, for the completion of resilient upgrades to public facilities and infrastructure or other activities that improve community resilience from identified hazards. Assistance includes technical assistance, RHC direct procurement of vendors, and awards to subrecipients, to support applications for funding, or the development of eligible planning products required to apply for other sources of funding. RISC-Infrastructure projects install mitigation upgrades that reduce the risks of community flooding, especially those due to severe rain events similar to Hurricane Ida.

- **How will Program Meet Definition of Mitigation**

  To be eligible to receive CDBG-DR funds under this Program, eligible planning activities must be focused on securing funds for proposed projects to increase resilience to disasters. Eligible infrastructure and public improvement activities must be focused on mitigation upgrades that reduce the risks of flooding. The Program will prioritize projects that meet this requirement by reducing the risks of community flooding due to severe rain events similar to Hurricane Ida. Projects that reduce the likelihood of flooding will also reduce the risk of damages and property losses due to flooding, both for the responsible entity and the community beneficiaries.

- **How will Program Address Current & Future Risks/Mitigation Needs Assessment**

Flooding is consistently among the hazards posing the greatest risks to lives and property across the disaster-declared counties and Statewide, as discussed in the Mitigation Needs Assessment, above. The Resilient Investments through Support and Capital Program's prioritization of project plans and infrastructure construction projects addressing significant rain events aligns with this shared focus on flooding as a critical area of concern.

- **Program Tieback to Disaster/Unmet Needs (if applicable)**

  Hurricane Ida exposed weaknesses and deficiencies in existing municipal systems, especially in their capacity to absorb significant rain events. Project plans and infrastructure projects serving the communities that experienced flooding during Hurricane Ida and that specifically address issues contributing to the flooding are direct responses to the disaster.

- **Program National Objective(s)**

  **Primary Activity Type:** Planning 105 (a) (12), 105(a) (2)

  **Supporting Activity Type:** All eligible activities permitted under HCDA Section 105(a) and applicable waivers

  **National Objective:** Low- to Moderate-Income or Urgent Need; Planning expenditures are considered to address the national objectives

- **Program Eligibility**

  Proposed planning and infrastructure activities must be for projects located in a disaster-declared county or benefitting a community located in a disaster-declared county. ~~and~~ Planning activities must provide a public service or benefit following implementation. Proposed upgrades to existing facilities or systems must include tangible improvements in their ability to maintain operation while withstanding or responding to the impacts of likely hazard events. New facilities or systems must respond to identified deficiencies in a community's existing capacity to respond to hazards. Project plans do not need to respond to damages or other impacts from the remnants of Hurricane Ida in order to be eligible for this Program; however, project plans that can demonstrate a connection to Hurricane Ida may receive higher scores.

  Applicants and subrecipients to the Program can be units of local/County government; State agencies and authorities; public schools (K-12) and universities; first responders, including volunteer fire and EMS facilities; nonprofits or not-for-profit entities that serve communities within disaster-declared counties; or a consortium of any of the above. Subrecipients must be eligible to receive federal funding awards.

Exceptions to Program standards and eligible expenses may be required to achieve program objectives, and the exceptions review and approval processes will be further detailed in program guidelines.

- **Program Responsible Entity**

  RHC intends to distribute CDBG-DR funds to partners via a competitive process and/or direct selection of subrecipients. The selected partners are responsible for administering the project and maintaining compliance with the terms of the partnership agreement.

- **Program Maximum Assistance**

  RHC may award grant funds up to $200,000 per project in the RISC-Planning component. It is anticipated that the CDBG-DR planning award will allow the recipient to successfully leverage other funding sources such as, but not limited to, FEMA Hazard Mitigation Grant Program (HMGP), Subrecipient capital funds, and the Infrastructure Investment and Jobs Act (IIJA). RHC is making up to $17,000,000 in grant funding available for RISC-Infrastructure projects and anticipates awarding five awards total with four awards of up to $3,000,000 per project and one award of up to $5,000,000. These awards may be used in combination with other grant or local funds to meet the full funding needs of a proposed project.

  For both components, ~~W~~where other contributing funding sources require a specific local contribution percentage, the CDBG-DR award may be used to satisfy this requirement. In the event the outstanding financing need for a project exceeds the Program maximum, RHC may elect to make an exception to the maximum award in order to allow the project to proceed. Exceptions will be evaluated on a case-by-case basis and may include providing technical assistance to the responsible entity with the objective of securing alternate gap financing prior to RHC authorizing an exception to the maximum award.

- **Program Estimated Begin and End Dates**

  RHC anticipates that the Program will begin in the last calendar quarter of 2022, after HUD has approved the Public Action Plan.

  The Program will end when all eligible participants have completed closeout, all budgeted funds have been expended, or six (6) years after execution of the grant agreement with HUD.

- **Other Program Details**

  RHC will establish Resilience Performance Metrics for the Program before carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures.

- **Program Competitive Application Overview (if applicable)**

  Resilient Investments through Support and Capital Program funds are made available through a competitive Notice of Funding Availability (NOFA) process. RHC may advertise a single competitive NOFA or may publish multiple competitive rounds depending on Program responses and the available budget. All applications received in response to a published NOFA will be reviewed, scored, ranked, and awarded based on a score. As discussed in the "Distribution of funds" section above, RHC reserves the right to identify and select projects and subrecipients outside of the NOFA process. Projects selected through the NOFA process will establish a minimum threshold score to ensure that high-quality projects are selected. Program scoring priorities for the RISC-Planning and RISC-Infrastructure programs are detailed below:

  RISC-Planning

  ~~S~~Scoring priorities will include, but are not limited to, the following:

  1. Readiness to Proceed - How quickly can a project move from award to applications for other sources of funding, and construction completion in the event funding is secured? Has the recipient demonstrated capacity to perform similar projects? What is the potential for the proposed project to qualify for one or more federal/state funding sources? Would the project have a greater likelihood of success if the planning funds are awarded?
  2. Affordability & Access – Will the project serve Low-to Moderate-Income communities? How will the project further prioritize services in support of vulnerable populations? How will the proposed project represent a community-wide improvement associated with the impacts of Hurricane Ida or how will it be used as preparation of response to similar future events?
  3. Connection to Mitigation Needs: How does the project specifically respond to the mitigation needs of the area being served? 5. Nexus to the Storm: How does the project specifically respond to the unmet needs assessment associated with Hurricane Ida? For instance:

  1. Was the project property/site directly impacted by Hurricane Ida?
  2. Is the project located within an area impacted by Hurricane Ida?
  3. Does the project represent a community-wide improvement associated with the impacts of Hurricane Ida?

  RISC-Infrastructure:

  A committee will score proposals based on how well they meet the selection criteria. RHC/HTFC will select proposals with the highest point scores. RHC reserves the right to select lower-scoring projects that meet the minimum threshold in order to meet its

Federal requirement to allocate 80% of Ida CDBG-DR funding to Westchester County and 70% of funds to benefit LMI persons.

1. Readiness to Proceed (20 points)
2. Applicant Experience & Capacity (15 points)
3. Nexus to Hurricane Ida (10 points)
4. Connection to Mitigation Needs (20 points)
5. Affordability and Access (15 points)
6. Cost Reasonableness (20 points)

- **Program Method of Distribution Description/Overview (if applicable)**

  Not applicable

**Projection of Expenditures**

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2024 | $1,373,297.32 ~~$ 460,934.28~~ | $0.00 | 1,373,297.32 ~~$ 460,934.28~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2024 | $1,373,297.32 ~~$ 460,934.28~~ | $0.00 | $2,746,594.64 ~~$ 921,868.56~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2025 | $1,373,297.32 ~~$ 460,934.28~~ | $0.00 | $4,119,891.96 ~~$ 1,382,802.83~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2025 | $1,373,297.32 ~~$ 460,934.28~~ | $0.00 | $5,493,189.28 ~~$ 1,843,737.11~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2025 | $1,373,297.32 ~~$ 460,934.28~~ | $0.00 | $6,866,486.60 ~~$ 2,304,671.39~~ | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| P-21-NY-36-LDZ1 | 10/01/2025 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $8,239,783.92 ~~$2,765,605.67~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $9,613,081.24 ~~$3,226,539.94~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $10,986,378.56 ~~$3,687,474.22~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $12,359,675.88 ~~$4,148,408.50~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $13,732,973.20 ~~$4,609,342.78~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $15,106,270.52 ~~$5,070,277.06~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $16,479,567.84 ~~$5,531,211.33~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $17,852,865.16 ~~$5,992,145.61~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $19,226,162.48 ~~$6,453,079.89~~ | $0.00 |
| P-21-NY-36-LDZ1 | 01/01/2028 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $20,599,459.80 ~~$6,914,014.17~~ | $0.00 |
| P-21-NY-36-LDZ1 | 04/01/2028 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $21,972,757.12 ~~$7,374,948.44~~ | $0.00 |
| P-21-NY-36-LDZ1 | 07/01/2028 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $23,346,054.44 ~~$7,835,882.72~~ | $0.00 |
| P-21-NY-36-LDZ1 | 10/01/2028 | $1,373,297.26 ~~$460,934.28~~ | $0.00 | $24,719,351.70 ~~$8,296,817.00~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 10/01/2023 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 01/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 04/01/2024 | $ - | $0.00 | $ - | $0.00 |
| B-21-DF-36-0001 | 07/01/2024 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | 1,373,297.32 ~~$460,934.28~~ | $0.00 |

| Grant Number | Period | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual P-21-NY-36-LDZ1 |
|---|---|---|---|---|---|
| B-21-DF-36-0001 | 10/01/2024 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $2,746,594.64 ~~$921,868.56~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2025 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $4,119,891.96 ~~$1,382,802.83~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2025 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $5,493,189.28 ~~$1,843,737.11~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2025 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $6,866,486.60 ~~$2,304,671.39~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2025 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $8,239,783.92 ~~$2,765,605.67~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $9,613,081.24 ~~$3,226,539.94~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $10,986,378.56 ~~$3,687,474.22~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $12,359,675.88 ~~$4,148,408.50~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2026 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $13,732,973.20 ~~$4,609,342.78~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $15,106,270.52 ~~$5,070,277.06~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $16,479,567.84 ~~$5,531,211.33~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $17,852,865.16 ~~$5,992,145.61~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2027 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $19,226,162.48 ~~$6,453,079.89~~ | $0.00 |
| B-21-DF-36-0001 | 01/01/2028 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $20,599,459.80 ~~$6,914,014.17~~ | $0.00 |
| B-21-DF-36-0001 | 04/01/2028 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $21,972,757.12 ~~$7,374,948.44~~ | $0.00 |
| B-21-DF-36-0001 | 07/01/2028 | $1,373,297.32 ~~$460,934.28~~ | $0.00 | $23,346,054.44 ~~$7,835,882.72~~ | $0.00 |
| B-21-DF-36-0001 | 10/01/2028 | $1,373,297.26 ~~$460,934.28~~ | $0.00 | $24,719,351.70 ~~$8,296,817.00~~ | $0.00 |

**Projection of Outcomes**

| Period | Performance Measure | Quarterly Projection of Outcomes | Quarterly Actual of Outcomes | Cumulative Projection of Outcomes | Cumulative Actual of Outcomes |
|---|---|---|---|---|---|
| 7/1/2026 | #of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 10/1/2026 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 1/1/2027 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 4/1/2027 | #of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 7/1/2027 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 10/1/2027 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 10/1/2027 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 1/1/2028 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |
| 4/1/2028 | # of Residents Protected from Flooding # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 7/1/2028 | # of Residents Protected from Flooding | 0 | 0 | 1~~0~~ | 0 |
| 10/1/2028 | # of Residents Protected from Flooding | 1400 | 0 | 2800 | 0 |
| 1/1/2029 | #of Residents Protected from Flooding | 1400 | 0 | 4200 | 0 |

| | | | | | |
|---|---|---|---|---|---|
| 4/1/2029 | # of Residents Protected From Flooding | 42000 | 0 | 46200 | 0 |
| 7/1/2029 | # of Residents Protected From Flooding | 0 | 0 | 0 | 0 |

| Period | Performance Measure | Quarterly Projection of Outcomes | Quarterly Actual of Outcomes | Cumulative Projection of Outcomes | Cumulative Actual of Outcomes |
|---|---|---|---|---|---|
| 4/1/2023 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 7/1/2023 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 10/1/2023 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 1/1/2024 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 4/1/2024 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 7/1/2024 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 10/1/2024 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 1/1/2025 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 4/1/2025 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 7/1/2025 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 10/1/2025 | # of Plans or Planning Products | 0 | 0 | 0 | 0 |
| 1/1/2026 | # of Plans or Planning Products | 1 | 0 | 1 | 0 |
| 4/1/2026 | # of Plans or Planning Products | 4 | 0 | 5 | 0 |

| | | | | | |
|---|---|---|---|---|---|
| 7/1/2026 | # of Plans or Planning Products | 5 | 0 | 10 | 0 |
| 10/1/2026 | # of Plans or Planning Products | 5 | 0 | 15 | 0 |
| 1/1/2027 | # of Plans or Planning Products | 5 | 0 | 20 | 0 |
| 4/1/2027 | # of Plans or Planning Products | 4 | 0 | 24 | 0 |
| 7/1/2027 | # of Plans or Planning Products | 0 | 0 | 24 | 0 |
| 10/1/2027 | # of Plans or Planning Products | 0 | 0 | 24 | 0 |
| 1/1/2028 | # of Plans or Planning Products | 0 | 0 | 24 | 0 |

| Period | Performance Measure | Quarterly Projection | Quarterly Actual | Cumulative Projection | Cumulative Actual |
|---|---|---|---|---|---|
| 04/01/2023 | # of public facilities | 0 | 0 | 0 | 0 |
| 07/01/2023 | # of public facilities | 0 | 0 | 0 | 0 |
| 10/01/2023 | # of public facilities | 0 | 0 | 0 | 0 |
| 01/01/2024 | # of public facilities | 0 | 0 | 0 | 0 |
| 04/01/2024 | # of public facilities | 0 | 0 | 0 | 0 |
| 07/01/2024 | # of public facilities | 0 | 0 | 0 | 0 |
| 10/01/2024 | # of public facilities | 0 | 0 | 0 | 0 |
| 01/01/2025 | # of public facilities | 0 | 0 | 0 | 0 |
| 04/01/2025 | # of public facilities | 0 | 0 | 0 | 0 |
| 07/01/2025 | # of public facilities | 0 | 0 | 0 | 0 |
| 10/01/2025 | # of public facilities | 2 | 0 | 2 | 0 |
| 01/01/2026 | # of public facilities | 2 | 0 | 4 | 0 |
| 04/01/2026 | # of public facilities | 2 | 0 | 6 | 0 |
| 07/01/2026 | # of public facilities | 2 | 0 | 8 | 0 |
| 10/01/2026 | # of public facilities | 2 | 0 | 10 | 0 |
| 01/01/2027 | # of public facilities | 2 | 0 | 12 | 0 |
| 04/01/2027 | # of public facilities | 2 | 0 | 14 | 0 |
| 07/01/2027 | # of public facilities | 2 | 0 | 16 | 0 |
| 10/01/2027 | # of public facilities | 2 | 0 | 18 | 0 |

| | | | | | |
|---|---|---|---|---|---|
| ~~01/01/2028~~ | ~~# of public facilities~~ | ~~2~~ | ~~0~~ | ~~20~~ | ~~0~~ |

## 5. Appendix

**Certifications.**

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

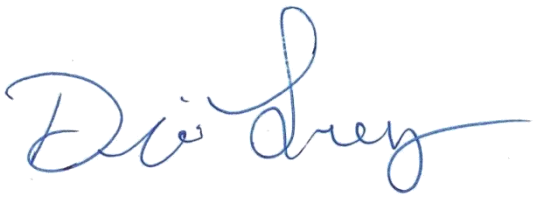
3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
    a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
    b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee's implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory

data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

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



7/25/2024

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

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

**c. Summary and Response of Public Comments.**

The following provides a summary of public comments received for the State of New York Action Plan Amendment 5 for Community Development Block Grant- Disaster Recovery in response to Hurricane Ida (FEMA 4615). During the public comment period of March 14th, 2025 to April 13th, 2025, RHC received a total of zero (0) comments during the thirty (30) calendar days.

The following provides a summary of public comments received for the State of New York Action Plan Amendment 1 for Community Development Block Grant- Disaster Recovery in response to Hurricane Ida (FEMA 4615). During the public comment period of April 14th, 2023 to May 14th, 2023, RHC received a total of zero (0) comments during the thirty (30) calendar days.

The following provides a summary of public comments received for the State of New York Action Plan for Community Development Block Grant- Disaster Recovery in response to Hurricane Ida (FEMA 4615), during the public comment period of **August 29th, 2022 to September 28th, 2022**. GOSR received a total of 43 comments during the thirty (30) calendar days. GOSR received 9 emails and 18 submissions via www.stormrecovery.ny.gov, and comments from 16 commenters at two public hearings. Commenters may have submitted more than one comment as part of their submission. GOSR received seven comments from six elected officials, including two New York City representatives, and four letters from three organizations and one New York City Assemblymember.

*Attachment of full public comment:*

## 1. Infrastructure

### ***1.1 Comment***

The State received six comments regarding infrastructure projects to mitigate flooding. One individual referenced a proposed USACE flood mitigation project as insufficient to address the frequent flooding in Mamaroneck and requested updates to Mamaroneck's aging reservoir and dam infrastructure to improve water management and mitigate future flood events. Another homeowner discussed the flooding impacts to his neighborhood, from both Hurricanes Ida and Sandy. The commenter stated that his neighbors are not fixing their damaged basements because they know they will flood again in future storms, especially given climate change impacts. He stated that investments in resilient infrastructure are more effective than home repair funds because infrastructure funding will help prevent future flood damage. A representative of the Troublesome Brook Flood Protection Group requested more funding for infrastructure projects and suggested implementing stormwater management through pipe widening and adjustments in order to address the root causes of flooding in his neighborhood over the long term in a cost-effective manner. The commenter stated that home repairs will not prevent future flooding and advocated for an increase in infrastructure mitigation project funding. The commenter also noted the difficulty in coordinating these efforts between the local and state governments. The flooding issues at Troublesome Brook were also referenced by another commenter, who highlighted the role of undersized stormwater systems and the local jurisdiction's need for support to address the issue. The commenter also requested more coordination between the State and local governments on infrastructure projects. A member of the Washingtonville Housing Alliance (WHA) also supported infrastructure investments, stating that resiliency funds for individual building improvements will only go so far, and investment in infrastructure improvements can protect areas devastated by Hurricane Ida and future climate change related weather events. Assemblymember Steven Otis (91st District) highlighted Hurricane Ida and prior storms' impacts to Westchester County and the resulting need for infrastructure resiliency and mitigation projects, including addressing inadequate stormwater infrastructure. Assemblymember Otis stated his support for the proposed mitigation programs and noted the need to leverage further funds for such projects and that many already have plans ready for implementation.

*Response*

The State recognizes flooding as a significant risk to the disaster-impacted area and is proposing the Resilient Investments through Support and Capital Program to address these mitigation needs. The Program will provide CDBG-DR funds to units of local government, public entities, or non-profit organizations in order to fully leverage other funding sources for the completion of resilient upgrades to public facilities and infrastructure. Up to $200,000 is available for each selected project, unless an exception applies. Units of local/county government; State agencies and authorities; public schools (K-12) and universities; first responders, including volunteer fire and EMS facilities; and not-for-profit entities that serve communities within disaster-declared counties, are eligible to apply. The Program will prioritize projects that reduce the risks of community flooding due to severe rain events like Hurricane Ida. The Program will also consider how projects will prioritize services in support of vulnerable populations. In addition, the State is proposing to utilize planning funds available under its allocation to support efforts by selected subrecipients, including local jurisdictions, to perform feasibility and engineering studies that can inform the design and funding approach of future community resiliency awards. The State recognizes that its CDBG-DR allocation is insufficient to address all infrastructure mitigation needs in the storm-impacted area and has therefore designed programs to support local entities in leveraging additional funds for larger-scale mitigation and resiliency projects, including supporting interagency coordination to secure available funds.

***1.2 Comment***

The State received three comments regarding overdevelopment and inadequate storm drainage. An individual asked if the Village of Mamaroneck is raising awareness about over-development in Harrison and White Plains, and the increased amount of water that is directed to the Mamaroneck and Sheldrake rivers. The individual suggested transforming Saxon Woods into a floodable lake. A resident of Yonkers noted the lack of adequate storm drainage throughout the city, and that new apartment development in the area has not been accompanied by stormwater management infrastructure. As a result, stormwater from these developments is pushed into surrounding neighborhoods, flooding homes. They suggested that the State undergo a broader stormwater engineering study and swiftly have the money available to begin infrastructure improvements. An additional commenter requested information regarding measures being taken to prevent future flooding of essential emergency response routes, and inquired about who is responsible for the cleaning and maintenance of the storm drain under roads in their town.

*Response*

The State recognizes that both the root causes and potential solutions to flooding risks often cross jurisdictional lines. In addition to existing State initiatives to identify challenges and solutions to flooding at a regional watershed level, the Resilient Investments through Support and Capital Program will seek to encourage and facilitate cross-jurisdictional and holistic approaches to flood risk mitigation. Scoring criteria for the project selection under this program include consideration of whether the project will

have a community-wide impact. The State encourages submissions for projects that address critical mitigation needs at the local, county, and State-wide level, including critical lifelines such as emergency response routes. CDBG-DR funds may not be used for the long-term maintenance and operations of infrastructure projects and other improvements. This responsibility falls to the applicable agency or government holding jurisdiction. Grant agreements for infrastructure projects funded through the Resilient Investments through Support and Capital Program convey the long-term operations and maintenance responsibilities to the relevant entities.

## 2. Equity

### ***2.1 Comment***

The State received a letter of support from the Municipal Housing Authority for the City of Yonkers (MHACY). This letter was also provided as a public comment at one of the Action Plan Public Hearings. The MHACY noted the damage sustained by their units during Hurricane Ida and the difficulty in securing FEMA and HUD funding for repairs and mitigation due to the private ownership of units in their portfolio. The organization highlighted that the Affordable Housing Resiliency Initiative Program and the Resilient Investments through Support and Capital Program address the needs of affordable housing tenants and increase resilience among low-income groups. The State received a comment from a representative of the Washingtonville Housing Alliance (WHA), describing the physical and financial toll of Hurricane Ida on properties within the not-for-profit Housing Alliance. Due to insurance exclusions, WHA paid tens of thousands of dollars out of pocket for repairs. The Alliance also suffered lost rent revenue, with some ground floor units still uninhabitable to this day. The commenter stated that funds must be made available to assist affordable housing providers with rehabilitating damaged units. The State received a separate comment from the Community Service Coordinator for WHA, describing the negative impacts of material losses and displacement on tenants' mental, physical, and financial health. Much of the toll came from lower income populations having few resources to deal with and recover from Hurricane Ida. The representative requested that the Governor and other officials provide monetary resources and create a manageable and efficient application process.

*Response*

The State thanks the Municipal Housing Authority for the City of Yonkers for its support and for its continued collaboration on the State's Hurricane Ida Action Plan and recovery activities. The State recognizes that many of the impacted area's public housing authorities have leveraged private conversion financing in order to maintain and modernize their aging property portfolios. Housing Authorities have reported that these efforts, however, have left the properties excluded from most of the typical sources of disaster recovery assistance. The unmet needs at these properties are therefore far greater than is typical of public housing that has not pursued conversion financing. The

Affordable Housing Resiliency Initiative Program eligibility requirements allow for funding of multi-family affordable housing resiliency improvements, regardless of whether the units are publicly or privately owned. Potential projects must be selected through a Request for Proposals process as described in this Action Plan. The State will work closely with entities proposing projects for the Affordable Housing Resiliency Initiative Program to ensure an efficient and manageable application process.

The State also acknowledges the challenges highlighted by the WHA regarding remaining unmet need for repairs of storm damage and recognizes that costs incurred to address immediate repair needs can represent outlays that affordable housing providers are ill-equipped to absorb and could impact funding for other essential functions of these providers. Therefore, in response to this comment, the State is modifying this Action Plan to allow storm-damage repairs and reimbursements for such repairs as eligible project costs under the Affordable Housing Resiliency Initiative Program, by adding the following sentence to the “"Program Eligibility” subsection for the Program: " The total development project may include repairs already completed or remaining rehabilitation of storm damages and/or repetitive losses in addition to dedicated mitigation measures."

***2.2 Comment***

The State received a comment from the Mayor of New Rochelle, noting Hurricane Ida’s impact on the city and stating that while the Programs proposed in the Action Plan could change, they are consistent with the city’s consultation conversations with GOSR. The mayor highlighted the remaining unmet need for homeowners and renters after receiving disaster assistance, including FEMA aid; the need to focus on resiliency and mitigation in light of climate change; and noted his belief that the proposed Programs will address these needs. The mayor also noted New Rochelle’s commitment to continue collaborating with the State on program outreach and seeking funds for mitigation projects.

*Response*

The State thanks Mayor Bramson for his support and for his continued collaboration on the State’s Hurricane Ida Action Plan and recovery activities. As the Mayor noted, the State's proposed Hurricane Ida Housing Recovery and Reimbursement Program is designed to address remaining unmet need for home repairs after other sources of disaster recovery funding have been utilized for the area’s most vulnerable homeowners. The Renters Resilient Housing Incentive Program is focused on supporting impacted, vulnerable renters to secure safe housing, and the Affordable Housing Resiliency Initiative and Resilient Investments through Support and Capital Programs are designed to address mitigation and resiliency needs for affordable housing and infrastructure, respectively.

***2.3 Comment***

The State received a comment of appreciation for the translation of the Action Plan. The commenter encouraged the State not only to translate the Action Plan but to conduct outreach to provide community-appropriate explanations of the Action Plan and application guidance to Limited English Proficiency populations, seniors, and others who may not trust the government or who may need extra assistance.

*Response*

The State is committed to ensuring vulnerable populations and those with Limited English Proficiency have equitable access to participate in the proposed programs. In carrying out the recovery activities set forth in this Action Plan, the State will adhere to its Language Access Plan, which includes providing translation of all vital documents, including program applications into Spanish, and providing other translation and interpretation services upon request. As noted in the Action Plan, the Action Plan, its substantial amendments, and other programmatic material will be translated and made available in Spanish. Summaries of vital information and changes contained in the Action Plan and substantial amendments, as well as information on the public hearings, how to submit public comments, and how to request interpretation and/or translation, will be made available in Portuguese, Italian, Chinese, French Creole, Persian, Yiddish, Russian, Polish, Arabic, and Tagalog.

The State will also coordinate program outreach and announcements with community-based organizations in impacted areas and provide website accessibility for individuals with disabilities and Limited English Proficiency. The State maintains a comprehensive website regarding all disaster recovery activities assisted with these funds. The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

The State will provide multiple methods of communications including, but not limited to, the public website, toll free numbers, email addresses, and TTY and relay services to provide applicants for recovery assistance with timely information to determine the status of their application. In addition to providing accessibility for persons with disabilities, the State provides instructions on changing the language settings in popular web browsers to support meaningful access by Limited English Proficiency persons in their preferred language. The instructions can be accessed on every page of the website and are translated into multiple languages.

***2.4 Comment***

The State received a comment encouraging investment in backup generators and community centers within housing authorities. The commenter maintained that community members look to housing authorities as safe havens in crises, so it is important to invest in their resiliency, specifically by installing backup power to address residents' medical needs. He asserted that infrastructure disinvestment in low-income communities has increased vulnerability to storms within these populations, and that

senior residents are especially at-risk when power is lost during storms. The commenter acknowledged that this is not much money, so the State must make prudent investments that link all aspects of resilience together.

*Response*

Projects such as these would be eligible for funding through the proposed Affordable Housing Resiliency Initiative Program, which provides CDBG-DR funds to public housing entities, housing developers, not-for-profit associations, or units of local government to support the completion of site-specific mitigation projects that will improve the resilience of multi-family affordable and/or public housing developments against identified hazards or repetitive loss events. Up to $3,000,000 is available per project, unless an exception applies, and selected projects must include the construction or installation of features that are designed specifically to enable residences to remain safely habitable in the event of an anticipated future disaster. Proposed projects must go through the program process outlined in the Action Plan and undergo an eligibility review before being selected for funding.

***2.5 Comment***

The State received a comment from State Senator Shelley Mayer (37th District) asserting that the State must improve access to and broaden the eligibility for the State's programs. The Senator discussed Hurricane Ida's impact on her district, including infrastructure, property and highlighting the impact on homeless residents, and noted the diversity of those impacted by the storm in terms of both income and race and ethnicity. Senator Mayer also requested that the State include assistance for personal property loss or damage, daycares, churches, and other not-for-profit structures which were damaged by Hurricane Ida. In addition, the Senator stated that the State's CDBG-DR allocation was insufficient to address all post-storm needs and encouraged the State to leverage more funds for recovery efforts. Two additional commenters noted losses of personal property during Hurricane Ida floods and requested financial assistance to replace the items.

*Response*

The State is committed to prioritizing vulnerable populations and designed programs based on its unmet and mitigation needs analyses, included in this Action Plan, which identified housing needs as the largest remaining unmet need from the storm. The State is also committed to implementing the proposed programs with as much flexibility as possible while complying with Federal requirements, which prohibit compensation for personal property losses. In rolling out its Programs, the State will continue to develop detailed demographic data analysis of the disaster-declared counties to support geographically targeted Program marketing. Application submissions and Program inquiries will be tracked throughout the Program application period and the State may modify its outreach efforts if known vulnerable and impacted communities are underrepresented. The State recognizes that its CDBG-DR allocation is insufficient to

address all remaining needs in the storm-impacted area and has therefore designed programs to support local entities in leveraging additional funds for larger-scale mitigation and resiliency projects, including supporting interagency coordination to secure available funds.

### ***2.6. Comment***

The State received a comment from the Executive Director of the Community Resource Center in support of the proposed rental assistance program. The Director noted Hurricane Ida's impact on the local immigrant community in terms of displacement, and underscored the need for application accessibility and flexibility in scenarios where families do not have formal lease agreements and will have difficulty providing proof of residence. She also urged the State to remove citizenship and legal residency requirements from the rental assistance program and, at a minimum, extend the program to immigrants under Temporarily Protected Status or to those with work permits.

*Response*

The State must comply with all federal requirements on provision of benefits. The State is committed to working with all applicants on a case-by-case basis to understand all eligibility barriers. The State will engage with the Community Resource Center and other community organizations to identify opportunities to limit barriers to assistance, including application accessibility and intake documentation requirements, and will coordinate on program announcements and outreach. As noted in the Action Plan, the Action Plan, its substantial amendments, and other programmatic material will be translated and made available in Spanish. Summaries of vital information and changes contained in the Action Plan and substantial amendments, as well as information on the public hearings, how to submit public comments, and how to request interpretation and/or translation, will be made available in Portuguese, Italian, Chinese, French Creole, Persian, Yiddish, Russian, Polish, Arabic, and Tagalog.

## 3. Housing

### ***3.1 Comment***

The State received an inquiry about whether repairs to backyard damage, including damage to retaining walls, caused by Hurricane Ida will be reimbursed under this Action Plan. The State also received a comment from a representative of the Troublesome Brook Flood Protection Group stating that they are eager to learn how they can apply for aid to lift their house to prevent future damage. The Troublesome Brook Group member and a Mamaroneck homeowner inquired about the application process and outreach generally.

*Response*

Due to limited funds and a commitment to prioritize vulnerable populations, at this time the State is not contemplating reimbursement awards or repair/mitigation efforts not directly related to habitability. However, the State recognizes that repairs to damage outside the home may impact future habitability. The proposed Housing Reimbursement and Repair Program will conduct on-site inspections to identify eligible scopes of work, including elevating mechanicals, electrical and plumbing mitigation, flood vents and backflow valves. The State will continue evaluating needs and budgets as they evolve and may consider other reimbursement programs in the future. The State advises all potential applicants to retain receipts for any storm-related repair costs.

Due to limited funding, the maximum award in the Housing Recovery and Reimbursement Program is $50,000. While this allows for assistance to complete repairs and in-home measures to improve resilience to flood inundation and to mitigate the impacts of future floods on habitability, including elevating mechanicals, electrical and plumbing mitigation, flood vents and backflow valves, at this time the maximum award is not enough to cover home elevations or repair/mitigation efforts not directly related to habitability. The State has established maximum award amounts and exception criteria for this Program in the Program Maximum Assistance subsection of this Program in the Action Plan. The State will conduct inspections of applicants' homes to identify eligible repairs and mitigation scope. The State will continue evaluating needs and budgets as they evolve and may consider this additional program scope in the future.

The State maintains a comprehensive website regarding all disaster recovery activities assisted with these funds. When program applications are available, they will be posted on www.stormrecovery.ny.gov. The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made monthly.

The expected timeline for application rollout is anticipated to begin in Spring 2023, following a period of outreach to potential applicants. Application forms and information will be posted to the website and the State will coordinate application announcements with community-based organizations in impacted areas. The application process will include intake and eligibility review.

The State will provide multiple methods of communications including, but not limited to, the public website, toll free numbers, email addresses, and TTY and relay services to provide applicants for recovery assistance with timely information to determine the status of their application. In addition to providing accessibility for persons with disabilities, the State provides instructions on changing the language settings in popular web browsers to support meaningful access by Limited English Proficiency persons in their preferred language. The instructions can be accessed on every page of the website and are translated into multiple languages.

***3.2 Comment***

The State received five comments, including one from Assemblywoman Gina Sillitti (16th District), requesting financial assistance for home repairs because other sources of funding, including property insurance, FEMA and other government sources, did not cover all the repairs to property damage caused by Hurricane Ida. One commenter also noted the lengthy process to access FEMA funds, while another individual inquired about eligibility guidelines for State assistance as they did not receive FEMA aid.

*Response*

CDBG-DR is designed to address unmet needs after other sources of funding are accounted for. Under the proposed Hurricane Ida Housing Recovery and Reimbursement Program, this includes remaining unmet repair and mitigation needs for housing after FEMA and other disaster recovery funds have been used. Applicants must go through an application and eligibility review process before receiving an award. Due to limited funds and a commitment to prioritize vulnerable populations, at this time the State is not contemplating reimbursement awards or repair/mitigation efforts not directly related to habitability. Resiliency and mitigation scope related to habitability may include, but is not limited to, elevating mechanicals, electrical and plumbing mitigation, flood vents and backflow valves. The State has established maximum award amounts and exception criteria for this Program in the Program Maximum Assistance subsection of this Program in the Action Plan. The State will conduct inspections of applicants' homes to identify eligible repairs and mitigation scope. The State will continue evaluating needs and budgets as they evolve and may consider other reimbursement programs in the future. The State advises all potential applicants to retain receipts for any storm-related repair or mitigation costs.

The State acknowledges that the FEMA award process can be lengthy in the face of the immediate needs of disaster survivors. Challenges related to funding administration and federal eligibility rules can contribute to this timeline. For CDBG-DR funded programs, the State will endeavor to roll out applications expeditiously and will seek to minimize documentation burdens and streamline program administration to provide assistance quickly while ensuring compliance with federal requirements.

As detailed in the Action Plan, eligibility requirements for the Hurricane Ida Housing Recovery and Reimbursement Program include being a homeowner in a disaster-declared county whose primary residence was a one (1) or two (2) unit residence that sustained real property damage as a result of the storm. The owner must hold fee-simple title to the subject property and at least one member of the household must be a U.S. Citizen or legal U.S. resident. Household income must be eighty percent (80%) or less than area median income (LMI) or the household must otherwise be considered a part of a vulnerable population. Priority processing will be given to LMI applicants.

Eligibility requirements for the Renters Resilient Housing Incentive Program include being a renter household in one of the disaster-declared counties whose household

income is eighty percent (80%) or less than area median income (LMI) and who either relocated for more than 12 months, or who desires to relocate, due to Hurricane Ida's impact. In addition, at least one member of the household must be a U.S. Citizen or legal U.S. resident. Applicants to the rental housing rehabilitation and mitigation component of this Program must be owners of one (1) to four (4) unit rental properties located within disaster-declared counties that are U.S. Citizens or legal U.S. residents who commit to reserving a minimum of seventy-five percent (75%) of the units for occupancy by low- and moderate-income persons for a period no less than two (2) years following project completion.

***3.3 Comment***

The State received one comment encouraging the provision of flood mitigation systems, such as inflatable barriers, for homeowners, renters, landlords, and business owners and the possibility of a rebate program for such measures.

*Response*

Due to limited funds and a commitment to prioritize vulnerable populations, at this time the State is not contemplating rebates or reimbursement awards for repair/mitigation efforts not directly related to habitability. In addition to providing assistance to complete repairs to storm-impacted residences, the proposed Housing Reimbursement and Repair Program focuses on permanent mitigation measures, including, but not limited to, elevating mechanicals, electrical and plumbing mitigation, flood vents and backflow valves. The State has established maximum award amounts and exception criteria for this Program in the Program Maximum Assistance subsection of this Program in the Action Plan. The State will conduct inspections of applicants' homes to identify eligible repairs and mitigation scope. The State will continue evaluating needs and budgets as they evolve and may consider other reimbursement programs in the future. The State advises all potential applicants to retain receipts for any storm-related repair or mitigation costs.

***3.4 Comment***

The State received comments from State Senator Shelley Mayer (37th District) and Assemblyman Steven Otis (91st District) requesting that financial assistance be made available to condominiums and cooperatives. Senator Mayer noted that these associations provide affordable housing to many of her constituents. Assemblymember Otis advocated for condos and co-ops to be eligible for the Affordable Housing Resiliency Initiative Program.

*Response*

Based on the Unmet Needs Assessment conducted, the limited funds available, and the State's commitment to prioritizing vulnerable populations, the State is not pursuing a condo/coop program at this time. The Unmet Needs Assessment undertaken by the

State did not identify a need for repairs and mitigation at condos and co-ops in the disaster-impacted area. The programs proposed in this Action Plan are designed to address the highest needs identified by the State's analysis. The State will continue evaluating needs, including unmet needs for condos and co-ops, as well as available funding, as they evolve and will explore the feasibility of creating a new program focused on identified needs for these types of housing. The State must submit a substantial Action Plan amendment for approval by HUD in order to add a program or expand eligibility.

***3.5 Comment***

The State received a comment from Assemblywoman Gina Sillitti (16th District) stating that her district's high home values and salaries are offset by high cost of living, and the constituents who do not qualify for assistance are facing crippling financial losses after Hurricane Ida, which is especially true for retirees living on fixed incomes. The Assemblymember asked the State to keep these factors in mind when assessing applications. One commenter inquired about program eligibility restrictions tied to income level and stated that middle class residents were also in need of relief.

*Response*

Per HUD regulations, the State is required to devote 70 percent of its funding to serving Low-to-Moderate-Income individuals. Low-to-Moderate-Income is defined by 80 percent or less than the area median income. When reviewing applications for program eligibility, the State will be as flexible as possible while complying with Federal regulations and recognizing the State's commitment to prioritizing vulnerable populations.

***3.6 Comment***

The State received a comment from Assemblyman Steven Otis (91st District) supporting the resiliency improvements, assistance to renters and owners, relocation, and housing repair programs. He also highlighted how the plan reinforces the importance of building code compliance, the remaining unmet need for residents after accessing other disaster assistance and recovery funds, how the State analyzed these needs in the Action Plan, including through consultation with local stakeholders, and how the program designs are responsive to the identified needs.

*Response*

The State thanks Assemblyman Otis for his support and for his continued collaboration on the State's Hurricane Ida Action Plan and recovery activities.

***3.7 Comment***

The State received a comment from the Chief Operating Officer of the Municipal Housing Authority for the City of Yonkers (MHACY) supporting the focus on affordable housing needs through the proposed Affordable Housing Resiliency Initiative and Renters Resilient Housing Incentive Programs, noting in particular the importance of small landlords to the provision of affordable housing in Yonkers. The comment also highlighted the need to incorporate resiliency into all housing programs.

*Response*

The State thanks Mr. Laboy Diaz for his support and for his continued collaboration on the State's Hurricane Ida Action Plan and recovery activities. As the comment highlights, the State's Action Plan includes programs focused on improving resiliency in the impacted area's affordable housing stock by providing funds to public housing entities, housing developers, not-for-profit associations, and units of local government, as well as small landlords who commit to maintaining minimum affordability levels in the assisted units.

***3.8 Comment***

The State received a letter from the Executive Director of the Community Resource Center requesting that tenants who returned to storm-damaged residences temporarily be eligible to receive the Safe Housing Incentive to support them in finding suitable permanent housing within a disaster-declared county. She stated that tenants should receive rental assistance for rent increases connected to post-storm repairs and renovations affecting the residences they returned to.

*Response*

The eligibility criteria for this Program as described in the Action Plan are intended to respond to the vast majority of relocation scenarios faced by the target population. All applicants to the Program will have their eligibility reviewed on a case-by-case basis and will have the ability to pursue appeals and/or a hardship process to support unanticipated needs.

***3.9 Comment***

The State received a comment from the Executive Director of the Community Resource Center requesting that the State implement a monitoring program to ensure that affordability commitments are honored for the percentage of units and duration required under the Renters Resilient Housing Incentive.

*Response*

Enforcement mechanisms for the affordability period specified for the Renters Resilient Housing Incentive Program specified in this Action Plan will be specified in the Program's Policies and Procedures. Program Policies will be posted on the GOSR

website. In addition, all participating landlords will be required to commit to the affordability period, including the compliance monitoring activities, in the grant agreement executed with GOSR prior to the obligation of grant funds.

## 4. Public Services

### ***4.1 Comment***

The State received a comment requesting the provision of resources to protect homeowners, renters, and business owners against future floods, including a website with information on how to protect against flooding, and where to purchase mitigation systems such as inflatable barriers.

*Response*

The State recognizes that non-infrastructure projects, such as the informational website the commenter proposed, can contribute to community resilience and mitigating the impact of future storms. Therefore, in response to this comment, the State is modifying the Action Plan to clarify that the proposed Resilient Investments through Support and Capital Program can fund non-infrastructure projects focused on community resilience and which meet the definition of “mitigation activities” by adding “or other activities that improve community resilience from identified hazards.” to the sentence “The Resilient Investments through Support and Capital Program provides CDBG-DR funds to units of local government, public entities, or non-profit organizations in order to fully leverage other funding
sources for the completion of resilient upgrades to public facilities and infrastructure or other activities that improve community resilience from identified hazards.” in the “Program Description” subsection of the Program; and replacing the word “construction” with “completion” in the sentence “Readiness to Proceed - How quickly can a project move from award to completion?” in the “Program Competitive Application Overview” subsection of the Program.

Proposed projects must go through the program process outlined in the Action Plan and undergo an eligibility review before being selected for funding.

In addition, non-infrastructure projects may be supported through the Planning funds and support detailed in the Action Plan. The State is modifying its Action Plan to clarify that non-infrastructure projects may receive this support by replacing “design and construction” with “that exceed the scope of funding available under this grant.” in the sentence “GOSR plans to also use planning dollars to provide technical assistance to support efforts by subrecipients to secure other funding sources for projects that exceed the scope of funding available under this grant.” in the “Leveraging Funds” section of this Action Plan.

## 5. Small Business

### ***5.1 Comment***

The State received six comments regarding small businesses. Assemblyman Steven Otis (91st District) asserted the need for mitigation programs for small businesses in high flood areas and suggested the State explore additional funding sources for these projects. At the virtual public hearing, the Executive Director of the Community Resource Center (CRC), asked if the State would make reimbursements to small business owners. State Senator Shelley Mayer (37th District) and, in a separate letter, the Executive Director of the CRC, requested that the State aid small businesses damaged by Hurricane Ida. In her letter, the CRC Executive Director also stated that lack of flood insurance should not disqualify business owners from applying for assistance. The President of the Westchester County Public Association requested that some funds be used to aid small businesses whose needs went largely unmet by federal programs and were exacerbated by the lingering impact of the COVID-19 pandemic on operations.

*Response*

Based on the Unmet Needs Assessment conducted and the limited funds available, the State is not contemplating a Small Business Program at this time. Although the assessment did identify unmet needs for impacted small businesses, the primary need identified was for housing repairs and mitigation, and the State is focusing its programs accordingly. The State notes that SBA loans were made available to address the recovery needs of small businesses impacted by Hurricane Ida and the COVID-19 pandemic. In addition, the proposed Resilient Investments through Support and Capital Program could be used by local jurisdictions and other entities to propose infrastructure mitigation projects that address root causes of flooding for impacted small businesses. The State will continue evaluating needs and budgets as they evolve and may consider a Small Business program in the future. The State must submit a substantial Action Plan amendment for approval by HUD in order to add a program.

## 6. Flood Insurance

### ***6.1 Comment***

The State received two comments regarding flood insurance. Assemblywoman Gina Sillitti (16th District) stated that homes in her district lie outside of the FEMA floodplain, leaving homeowners unable to get Hurricane Ida repairs covered by insurance, since many of them do not have flood insurance. Another commenter stated that his home flooded twice, including during Sandy, before he owned the home. Because his home is

outside of the FEMA floodplain, the Sandy flooding was not disclosed to him when he purchased the property, and he did not purchase flood insurance before Hurricane Ida. Both commentors noted that Hurricane Ida presented a different kind of flooding that will only worsen over the years.

*Response*

The State recognizes flooding as a significant risk to the disaster-impacted area and that the flood risk from rainfall events outside designated floodplains is not captured by FEMA flood maps or insured through the NFIP. Addressing these issues will require legislative action at the federal level and is beyond GOSR's mandate. To address this flood risk, the State is proposing the Resilient Investments through Support and Capital Program to address mitigation needs. The Program will provide CDBG-DR funds to units of local government, public entities, or non-profit organizations in order to fully leverage other funding sources for the completion of resilient upgrades to public facilities and infrastructure. Up to $200,000 is available for each selected project, unless an exception applies, and units of local/county government; State agencies and authorities; public schools (K-12) and universities; first responders, including volunteer fire and EMS facilities; and not-for-profit entities that serve communities within disaster-declared counties are eligible to apply. The Program will prioritize projects that reduce the risks of community flooding due to severe rain events similar to Hurricane Ida. The Program will also consider how projects will prioritize services in support of vulnerable populations.

## 7. New York City Inquiries

### ***7.1 Comment***

The State received eleven comments from New York City residents, including State Senator Jessica Ramos (13th District) and Assemblywoman Nily Rozic (25th District), about Hurricane Ida impacts and post-Ida conditions and needs in New York City neighborhoods. One of the commenters thanked the State for responding to their inquiry during a public hearing and asked about the application process for New York City residents.

*Response*

At this time New York State is prioritizing assistance through the New York State allocation to areas outside of New York City. New York City received its own allocation of $187 million, which will be the primary source of assistance for areas within the New York City area. The State will forward all comments received from New York City residents to the New York City Mayor's Office. New York City will establish a separate application process for their CDBG-DR programs. The State offered to connect the

commenter inquiring about NYC's application process with the city agency managing their Hurricane Ida recovery programs.

***7.2 Comment***

The State received an inquiry from a New York City resident regarding the degree of cooperation between city and state on the Hurricane Ida Action Plan, including the specific agencies involved in this cooperation. The resident also asked which department the State will forward city comments to.

*Response*

The State coordinates with the city through its existing agency relationships and will continue to do so as Hurricane Ida recovery programs are implemented. New York City's Hurricane Ida Action Plan is managed by the City's Office of Management and Budget, and all comments received by the State from New York City residents regarding the Hurricane Ida Action Plan will be forwarded to the Legislative Affairs team at the New York City Mayor's Office.

## 8. Non GOSR Projects

***8.1 Comment***

The State received an inquiry from one commenter about a proposed USACE project in Mamaroneck, unrelated to the State's Hurricane Ida Action Plan, and its timelines and oversight. The commenter also inquired about why their local jurisdiction is spending money on emergency equipment and vehicle replacement, and not infrastructure improvements.

*Response*

The State notes that the commenter is referring to projects and spending undertaken by the USACE and the local jurisdiction, not the State, and requests that the commenter direct questions and comments on non-CDBG-DR funded spending to the relevant agency or local jurisdiction.

**d. Data Sources/Methodologies.**

Owner Occupied Households:

- Minor-Low:
  - Less than $3,000 of FEMA inspected real property damage
- Minor-High:
  - $3,000 to $7,999 of FEMA inspected real property damage
- Major-Low:
  - $8,000 to $14,999 of FEMA inspected real property damage
- Major-High:
  - $15,000 to $28,800 of FEMA inspected real property damage
- Severe:
  - Greater than $28,800 of FEMA inspected real property damage

Renter Occupied Households:

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

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**e. Important Definitions and Terms.**

**Acronyms**

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: Citizen Participation
DOB: Duplication of Benefits
DRGR: Disaster Recovery and Grant Reporting System
FEMA: Federal Emergency Management Agency
HCD Act: Housing and Community Development Act of 1974, as amended
HMGP: Hazard Mitigation Grant Program
IA: (FEMA) Individual Assistance
LIHTC: Low-Income Housing Tax Credit
LMI: Low and moderate-income
NFIP: National Flood Insurance Program
PA: (FEMA) Public Assistance
RE: Responsible Entity
RFP: Request for Proposals

RHC: Office of Resilient Homes and Communities
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

**f. Standard Form 424.**

## Application for Federal Assistance SF-424

**16. Congressional Districts Of:**

* a. Applicant: NY-010 * b. Program/Project: NY-001

Attach an additional list of Program/Project Congressional Districts if needed.

117th_Congressional Districts.pdf | Add Attachment | Delete Attachment | View Attachment

**17. Proposed Project:**

* a. Start Date: 11/28/2022 * b. End Date: 11/28/2028

**18. Estimated Funding ($):**

| | |
|---|---|
| * a. Federal | 41,262,000.00 |
| * b. Applicant | 0.00 |
| * c. State | 0.00 |
| * d. Local | 0.00 |
| * e. Other | 0.00 |
| * f. Program Income | 0.00 |
| * g. TOTAL | 41,262,000.00 |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

**21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

| | |
|---|---|
| Prefix: | |
| * First Name: | Katie |
| Middle Name: | |
| * Last Name: | Brennan |
| Suffix: | |
| * Title: | Executive Director |
| * Telephone Number: | (212) 480-7191 |
| Fax Number: | |
| * Email: | katherine.brennan@stormrecovery.ny.gov |
| * Signature of Authorized Representative: | Katherine Brennan |
| * Date Signed: | 11/1/22 |

OMB Number: 4040-0004
Expiration Date: 12/31/2022

## Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [ ] Application
- [x] Changed/Corrected Application

* 2. Type of Application:
- [ ] New
- [ ] Continuation
- [x] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 9/30/22

4. Applicant Identifier:

5a. Federal Entity Identifier: WLNYVLMWZ9V6

5b. Federal Award Identifier: P-21-NY-36-LDZ1 (including B-21-DF-36-0001 and B-22-DF-36-0001)

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

* a. Legal Name: Housing Trust Fund Corporation

* b. Employer/Taxpayer Identification Number (EIN/TIN): 141675062

* c. UEI: WLNYVLMWZ9V6

**d. Address:**

* Street1: 38-40 State Street
Street2:
* City: Albany
County/Parish:
* State: NY: New York
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 122072837

**e. Organizational Unit:**

Department Name:

Division Name: Resilient Homes and Communities (RHC)

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:
* First Name: Dina
Middle Name:
* Last Name: Levy
Suffix:

Title: Senior Vice President of Single Family and Community Development

Organizational Affiliation:

* Telephone Number: 212-872-0309
Fax Number:

* Email: dina.levy@hcr.ny.gov

## Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218; 14.228

CFDA Title:

Community Development Block Grants/Entitlement Grants; Community Development Block Grants/State's program

*** 12. Funding Opportunity Number:**

FR-6326-N-01; FR-6368-N-01

* Title:

Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

See Ida Action Plan Summary

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

## Application for Federal Assistance SF-424

**16. Congressional Districts Of:**

* a. Applicant: NY-010 * b. Program/Project: NY-001

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

**17. Proposed Project:**

* a. Start Date: 11/28/2022 * b. End Date: 11/28/2028

**18. Estimated Funding ($):**

| | |
|---|---|
| * a. Federal | $68,228,000 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | |
| * f. Program Income | |
| * g. TOTAL | $68,228,000 |

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- ☑ c. Program is not covered by E.O. 12372.

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If "Yes", provide explanation and attach

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☑ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

| | |
|---|---|
| Prefix: | |
| * First Name: | Dina |
| Middle Name: | |
| * Last Name: | Levy |
| Suffix: | |
| * Title: | Senior Vice President of Single Family and Community Development |
| * Telephone Number: | 212-872-0309 |
| Fax Number: | |
| * Email: | dina.levy@hcr.ny.gov |
| * Signature of Authorized Representative: | |
| * Date Signed: | 07/25/2024 |