

**State of Illinois Disaster Recovery Substantial Action Plan Amendment**

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**Executive Summary**

The 2013, floods and tornados across the State of Illinois caused severe damage to homes, businesses, and infrastructure. In addition, the deadly disasters also increased the demand on the health and social service sectors of the State.

President Obama’s declarations in 2013 designated ninety-seven (97) Illinois counties as major disaster areas. Storm damage was scattered throughout the State with a higher concentration of damage along the Illinois River, Cook County and Southern Illinois in communities bordering the Ohio River and Mississippi River.

The impact of these disasters emphasizes the need for a thoughtful and comprehensive long-term recovery process. This Community Development Block Grant Disaster Recovery Action Plan Amendment (Action Plan) is part of that process. It quantifies the level of damage known thus far based on current data and describes the State of Illinois’ plan to obligate/spend $6.8 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds, which HUD allocated to Illinois in 2014 as its second round of CDBG-DR funding with a total of $10 million in disaster recovery funding. CDBG-DR funds must be used to satisfy “unmet needs”, that is, financial needs not satisfied by other public or private funding sources like FEMA Individual Assistance funds, Small Business Administration (SBA) disaster loans or private insurance. HUD also requires that CDBG-DR programs focus predominantly, but not exclusively, on the State’s most impacted counties and on the State’s low and moderate income (LMI) populations.

The State’s infrastructures were badly damaged by flooding and tornados. The City of Brookport, Illinois sustained major damage to its levy system which impacts hundreds of homes located in neighborhoods once protected from flooding. However, because of the damages sustained by the tornado and flood waters, neighborhoods once thriving are now struggling to rebuild. The storms also devastated a vast majority of the City of Gifford. Many low income homes and neighborhoods were completely destroyed. Communities along the Illinois River and in suburban Chicago were impacted by swollen rivers caused by seven (7) inches of rainfall in a 24 hour period. Additionally, swollen rivers affected the commerce industry along the Illinois River when seven (7) barges broke free from towing vessels, threatening the levy system and dam in Northern Illinois.

The storms also increased the need for State and local governments to provide crucial health and social services. After a natural disaster, the need for health and social services is particularly pronounced. Whether this includes assisting special needs households locate appropriate housing, protecting older adults from financial exploitation, or developing programs to help people cope with the added stress of recovering from a natural disaster, post storm health and social service resources must be provided.

In previous versions of the Action Plan, provisions were made to address the extensive devastation through the Disaster Recovery Public Infrastructure program and the Housing Rehabilitation, Reconstruction and Elevation (HRRE) program. Although homes were identified as eligible and funding offered, communities took advantage of other not-for-profit resources to rebuild. As of July 1, 2016, no applications have been received for the Housing program, while the State received more applications for Public Infrastructure than they could fund. This Amendment proposes to transfer all remaining project funding to the Disaster Recovery Public Infrastructure program, and fund applications already received until funding is exhausted.

**Introduction**

In 2013, the State of Illinois experienced some of its worst flooding in history. In the immediate aftermath of flooding and tornados, Illinois quickly embarked on the road to recovery. Risks to public health and welfare were addressed. Essential infrastructure, including roadways, railways, and utilities were restored. And countless other steps were undertaken by the State, by local communities and by Illinois citizens to pick up the pieces with the support of federal agency partners. Flooding accounts for more than 90 percent of declared disasters in Illinois. The States topographical surface area is home to one of the largest inland systems of rivers, lakes and streams in the United States with nearly 15% of its total land area flood prone. It is estimated that more than 250,000 structures are located in floodplain areas. Since 1993, nearly half of these structures have been mitigated, saving taxpayers millions of dollars every year. The 2013 storms affected 97 counties in the state.

CDBG-DR funds are administered by HUD and are to be used to address unmet disaster recovery needs – specifically, funding needs not satisfied by other public or private funding sources like FEMA Individual Assistance, SBA disaster loans or private insurance. Per an evaluation performed by HUD, the State of Illinois CDBG-DR program will receive $6.8 million of second round CDBG-DR funds to assist the State’s recovery efforts. These funds are in addition to funds received by Cook County and the City of Chicago for damages sustained in each grantees respective jurisdiction.

Funds appropriated in the Act are subject to additional guidance provided by HUD in the Federal Register (FR-5696-N-07/FR-5696-N-09). HUD requires that each grantee expends at least 80% of its allocation in the most impacted and distressed counties. Funds can be used only for eligible disaster-related activities unless HUD provides a waiver. Moreover, sufficient monitoring protections must be in place to prevent waste, fraud and abuse. And as a precondition to receiving CDBG-DR funds, the State of Illinois must submit a comprehensive Action Plan that details its unmet needs and describes the proposed uses of CDBG-DR funds to address those needs.

**State of Illinois Action Plan**

Governor Quinn has designated the Illinois Department of Commerce and Economic Opportunity (DCEO) as the entity responsible to HUD for administering the distribution of CDBG-DR funds for Illinois. This Action Plan Amendment was developed after having received considerable input from other State departments and agencies, affected communities and stakeholder groups and with support from federal government partners.

*Section 2* of the Action Plan Amendment provides an impact and unmet needs assessment that details many of the impacts of the floods and tornados and identifies the State’s current projection of unmet need. The unmet needs assessment is based on current available data and likely will change. The State will continue to refine its unmet needs assessment as more data become available.

*Section 3* outlines disaster relief and long-term recovery activities, focusing on the reconstruction and rehabilitation of primary residences and rental properties, and restoring critical infrastructure. Within each area, the State will focus on meeting the needs of low and moderate income populations and the most impacted counties as identified by HUD.

*Section 4* sets forth Illinois’ proposed programs. Housing and critical infrastructure recovery are the leading priorities that will be addressed with the CDBG-DR funds from HUD, the support of housing and infrastructure projects, enable municipalities to begin the rebuilding process and provide essential services to their communities, address health and social services for individuals in need, and provide code enforcement support to localities. Also, if identified within the data for unmet needs, the state will implement the necessary programs to assist with economic recovery.

*Section 5* addresses Illinois’ performance schedule for its proposed programs. At this time, it is premature to set out detailed performance metrics. The State will timely amend its Action Plan to describe performance metrics when appropriate.

*Section 6* describes other criteria pertaining to Illinois’ use of CDBG-DR funds based on HUD guidance.1

Amendments to this Action Plan likely will be necessary at different points throughout the long-term recovery efforts. As additional needs are identified and prioritized new programs may be added or existing programs may be altered in a manner necessitating an amendment.

**Section 2: Impact and Unmet Needs Assessment**

**Background**

HUD requires the State to complete an unmet needs assessment that quantifies the funding needed for recovery. The assessment is used to determine the extent of unmet needs and to help prioritize among those needs, with a focus on low and moderate income households and the most impacted counties. The assessment must evaluate three core recovery sectors: (1) housing; (2) the economy; and (3) infrastructure. Data sources relied on in this assessment include:

Federal Emergency Management Agency (FEMA) Individual Assistance (IA) data

Federal Emergency Management Agency Public Assistance (PA) data

Federal Emergency Management Agency Point Surveys

Department of Housing and Urban Development (HUD)

Comprehensive Housing Affordability Strategy (CHAS) 2012 data

Illinois Housing Development Authority (IHDA)

Small Business Administration (SBA) data

U.S. Census data

State of Illinois Office of Executive Investigator General

**2.1 Summary of Impact and Unmet Needs**

According to HUD, “unmet needs” are financial resources necessary to recover from a disaster that are not satisfied by other public or private funding sources like FEMA Individual Assistance, SBA disaster loans, or private insurance. Per HUD’s guidelines that an unmet needs analysis focus on the housing, economic and infrastructure sectors, Table 2-1 reflects Illinois’ current unmet needs in these three sectors. The figures reflect the most recent HUD guidance related to determining unmet housing needs. Tables contained in this Action Plan, including Table 2.1 below, have been updated to reflect the most recent available FEMA Individual Assistance data as of March 4, 2014. The figures likely will change as more recent, geographically specific, and precise data are compiled and analyzed.

|  |  |  |  |
| --- | --- | --- | --- |
| **Table 2-1** **Unmet Needs** | | | |
|  | Need | Funds Disbursed/Eligible | Unmet Needs |
| Housing | $405,126,671 | $280,292,725 | $124,833,946 |
| Businesses | $6,777,100 | $5,188,600 | $1,588,500 |
| Infrastructure/Community Facilities | $77,872,306 | $27,210,611 | $19,658,617 |
| Total | $489,776,077 | $285,481,325 | $204,294,752 |
| Sources: FEMA Individual Assistance data, SBA claims as of March 10, 2014 | | | |

The State’s unmet needs extend beyond the housing, economic and infrastructure sectors. Illinois’ recovery effort must focus not only on economic recovery, but also economic revitalization, which is not captured within Table 2-1. Illinois also must provide critical health and social services to certain populations affected by flooding and tornados in 2013; protect municipalities from losing critical services as a result of the storm; and address environmental issues. CDBG-DR funds must begin to address these unmet needs as well.

Although the State has an estimated $19,658,617 in unmet infrastructure and community facility needs, there is an urgent need to expand the supply of affordable housing, to stimulate economic activity and to replace housing stock lost to the storms. The State is working diligently with the federal government to expedite additional funds, which could be used to address unmet infrastructure needs.

**2.2 Housing Recommendations**

The 2013 storms significantly impacted Illinois’ housing sector. Using the methodology outlined in HUD’s Federal Register Notice (FR-5696-N-07/FR-5696-N-01) of FEMA Individual Assistance data effective March 4, 2014, the State was able to develop a plan that would serve areas of unmet needs based on the aforementioned methodology. The Federal Register specified that the most impacted are homes/rental properties determined to have a higher level of damage (major-low or higher). The information for housing enclosed within the plan, excludes second homes (i.e., vacation homes) per HUD requirements as they are ineligible for funding.

The location of FEMA Individual Assistance registrants with reported housing damage also may reflect the extent and concentration of damage to Illinois’ housing stock. Based on the FEMA Individual Assistance data as of March 4, 2014 the greatest concentrations of severe or major housing damage are located in 13 Counties. These 13 counties account for 85% of reported major and severe housing damage in Illinois.

To more fully address the extent of that impact, it is necessary to examine the storm’s impact on homeowners, rental stock, displaced populations, Illinois’ low and moderate income population and the most vulnerable households.

**2.2.1 Impact on Homeowners**

Homeowners whose homes are determined to be “substantially damaged”, by a floodplain manager, must rebuild to FEMA’s standards. Many of these homeowners likely will be required to elevate their homes. Without financial support, the added costs of housing elevations likely will be overly burdensome. Homeowners of structures that were not “substantially damaged” by the storms may not be facing mandatory elevation requirements in the short term, but may face significant increases in insurance premiums.

Compounding the importance of housing elevation assistance, federal legislation passed in 2012 removes insurance subsidies and bases premiums on actual flood risk which likely will significantly increase flood insurance costs for homeowners residing within a floodplain. Therefore, housing elevation assistance is a critical need for many of these homeowners in order to avoid pricing them out of their current residences. Based on available data, as well as input from federal and state departments and agencies, local

communities, stakeholder groups and citizens, Illinois’ owner-occupied housing needs include:

* Assisting homeowners with the reconstruction or rehabilitation of their homes
* Assisting homeowners in impacted communities who are now required to

elevate their “substantially damaged” homes

* Providing case management and technical assistance to help homeowners navigate the rebuilding and reconstruction process
* Providing interim assistance to impacted homeowners to encourage them to resettle and reoccupy homes they owned prior to the storm
* Providing buyout assistance, where appropriate, for homeowners residing in flood-prone areas where large scale buyouts would serve a public health and safety benefit, as well as an environmental benefit

**2.2.2 Analysis of Unmet Housing Needs**

To estimate the unmet housing need in Illinois, the State must first use available data to quantify the cost to repair damage to the housing sector caused by the storm as well as the costs to perform required housing elevations. The State then must add together amounts received from other funding sources like FEMA Individual Assistance, SBA disaster loans, and private insurance to quantify funding that has been provided for repairs to the housing sector. Subtracting the latter figure from the former arrives at Illinois’ current estimate of its unmet housing need. This estimate likely will change when the extent of housing damage becomes more precisely measurable.

FEMA Individual Assistance data as of March 4, 2014, reports a Full Verified Loss (FVL) of which is derived from cursory FEMA inspection reports. Previous disasters have shown that an FVL figure substantially underestimates the actual cost of rehabilitation and reconstruction. To estimate damage to owner-occupied units, HUD has previously adjusted FVL based on the ratio of SBA loans to FVL determinations to capture a more realistic estimate of repair costs, while assessing damage to rental units based on their proximity to damaged homes.

This unmet need assessment does not attempt to replicate the FVL analysis due to the lack of address-level SBA information specific to each applicant. Rather, to estimate the cost of repair, this assessment multiplies the average construction cost per square foot ($100 in Illinois per the 2012 tornado disaster in Harrisburg, Illinois) by the damage category and the total square footage. For example, the estimated cost to repair a 1,000 square foot unit with severe damage is $135,000 (100% \* 1000 \*100).

The extent of the damage uses the following defined categories of FVL combined with flood depth for owner and renter occupied homes. All homeowners and renters with more than four feet of flooding were assumed to be severely impacted.

**2.2.3 Damage Categories and Assumed Extent of Damage to Units**

In addition to physical damage to housing stock caused by the storm, the need for home elevations also represents a substantial cost. The unmet needs assessment assumes all of the owner-occupied homes with more than four feet of flooding and those newly added to the 100-year floodplain will require elevation. The current total amount of federal and non-federal funds distributed for repairs to Illinois’ housing sector and for elevations – including FEMA Individual Assistance funds, SBA loans and private insurance proceeds – totals $58,981,736. As a result, Illinois currently projects an unmet housing need of $14,745,434.

This figure likely understates the extent of Illinois’ unmet housing needs. It does not represent the universe of damaged homes, but instead is limited to individual FEMA applicants determined by FEMA to have sustained damage. It also excludes households that have not yet registered with FEMA. As additional data are compiled and analyzed, the State expects this figure to become more accurate and to escalate. Notably, this unmet needs assessment purposefully includes only owners’ primary residences and rental properties. Per guidance provided by HUD, providing CDBG-DR funds to assist owners of vacation homes or non-primary residences that were damaged during the storm is prohibited.

**2.2.4 Impact on Rental Stock**

Greater impact of the storms occurred to rental stock, which sustained severe or major damage.

Residents who were displaced because of tornado damage are receiving rental assistance after the storm. Even presuming that some of these displaced households have found a rental unit, it is probable that many remain “doubled up,” that is, living with friends or relatives.

The 2013 storms also had a significant impact on housing that is subsidized by both the state and federal governments, which includes public housing as well as housing financed primarily for older adults and Housing Choice Voucher (HCV) recipients. According to preliminary estimates effective March 2014, two federally subsidized units in two multi-family properties were damaged. These properties are located in Cook, LaSalle and Tazewell Counties. There were 34 public housing units damaged in the storm. No public housing households remain displaced.

To better understand the impact to Public Housing Authorities (PHAs), the Department of Commerce and Economic Opportunity reached out to each PHA in the State to assess damage to public housing agencies and to quantify the extent of damage sustained by PHAs as a result of the storm, as well as identify PHAs’ ongoing unmet recovery and rebuilding needs.

As of March 10, 2014, 73 housing authorities were contacted with three responding to the assessment. Of those responding they reported that flooding caused the most damage.

Damage to PHAs impact some of the most vulnerable households in Illinois. Almost all of the damaged units are public housing units serving households earning less than 80% of the area median income. We could assume that of those who did not respond prior to publication of the Action Plan were impacted in some way by the storms. However, because of the storms impact on some of the most populated areas of the State, any increase in rental costs would further exacerbate that strain on “working poor,” defined as households earning less than 80% of area median income.

Based on available data, as well as input from federal and state departments and agencies, local communities, stakeholder groups and citizens, Illinois’ rental housing needs include:

* Rental programs to assist currently displaced low and moderate income households
* Rental programs to repair or replace damaged rental units, particularly those that service low and moderate income households
* Rental programs that address the unique needs of Illinois’ special needs populations

**2.2.5 Impact on Special Needs Populations**

Households with special needs are oftentimes more vulnerable to natural disasters due to damaged or displaced support networks, accessibility issues or increased costs of living. Special needs populations displaced by the storms include adults, children, and youth who are homeless or at risk of homelessness, who have intellectual or developmental disabilities, who have physical disabilities or who have behavioral health needs. Certain populations of older adults also may face specialized challenges after a natural disaster.

**2.2.6 Homeless Households**

Prior to posting the draft of the Disaster Action Plan, DCEO had not received any data on homeless populations affected by the storms. Prior to submittal to HUD, DCEO will provide the data as part of the final plan document.

**2.2.7 Older Adults**

The storms impacted older adult households, the majority of whom are homeowners. Based on past experience from other disasters, Illinois recognizes that certain older adult households may face special challenges after a natural disaster. Initially, new building code requirements may require that many older adults elevate their homes. Elevating properties may result in accessibility issues that must be addressed to accommodate a household’s needs. Additionally, older adult populations may be at a greater risk of financial exploitation following a disaster.

**2.2.8 Individuals with Mobility Impairments**

Illinois Department of Human Services, Division of Disability Services (DDS) has identified ramping and other accessibility measures that may have to be undertaken in conjunction with housing elevations to ensure that certain properties can continue to serve the needs of individuals with physical disabilities. Additionally, retrofitting a newly elevated house with a ramp or lift will place additional financial burdens on households needing this accommodation.

**2.2.9 Households with Individuals Having Developmental or Intellectual Disabilities or Behavioral Health Needs**

A number of homes that house individuals with developmental or intellectual disabilities or with behavioral health needs were damaged or displaced during the 2013 storms. Damage from the storm has made it difficult for some displaced households with individuals having developmental or intellectual disabilities or behavioral health needs to find accommodating housing.

**2.3 Economic Development**

The tornados and floods in 2013 also had a widespread impact on Illinois’ business sector and particularly affected small businesses. The storm caused damage to commercial property and caused short- and long-term business operations losses. To address the extent of damage to the State’s workforce, small business climate, and local economic development, it is necessary to examine the storm’s impact on Illinois’ businesses and labor force.

**2.3.1 Businesses**

The 2013 storms impacted many businesses in Illinois, causing commercial property damage and short-term and long-term business operations losses. An example of the storms impact was felt when more than 500 flights were canceled at Chicago’s O’Hare Airport due to the extreme weather, and some trains were delayed. The entire State of Illinois, which has over 400,000 businesses, experienced high winds from the storms that passed through the state in March and November of 2013. Tens of thousands of businesses sustained short-term and long-term economic injuries.

Small businesses with five or fewer employees, which make up the majority of the State’s business community, are expected to have been more severely affected than larger businesses likely to have more resources or capability to offset storm-based losses. SBA figures demonstrate the extent of access to capital issues. Based on current figures, 73% of Illinois businesses that have applied for SBA disaster loans were denied oftentimes because they did not qualify or did not have sufficient funds available to rebuild their businesses.

**2.3.2 Labor and Employment**

Prior to posting the draft of the Disaster Action Plan, DCEO had not received any data on the affect the storm had on labor and employment for small and large businesses. Prior to submittal to HUD, DCEO will provide the data as part of the final plan document.

**2.3.5. Analysis of Unmet Business Need**

To estimate the extent of the unmet need in Illinois’ economic sector, this assessment subtracts funding provided to date by FEMA, SBA and private insurance from the current estimate of the total cost to repair commercial property damages and total amount of losses from interrupted business in the aftermath of the storm.

Commercial property damage is defined as any storm-related damage to commercial buildings, loss of inventory, and damage to fixtures, machinery and equipment. To estimate commercial property damage, the unmet needs assessment uses information on insurance claims reported by the Illinois Department of Insurance rather than SBA loans. Its dataset represents a greater universe of business damage than the SBA loan information.

Prior to posting the draft of the Disaster Action Plan, data had not been posted by the Illinois Department of Insurance. Prior to submittal to HUD, DCEO will provide the data as part of the final plan document.

**2.4 Infrastructure**

The 2013 storms extensively impacted Illinois infrastructure. Local and state roadways experienced significant damage from extensive flooding. Tornado winds caused trees and debris to make roads impassable. Rail and other public transit systems, which suspended operations in anticipation of the storm, experienced service disruptions. Ta

The delivery of core utility services was substantially impaired. Millions of Illinois residents lost power as tornado activity caused power outages and weeks of heavy rains caused severe flooding.  A tornado left parts of Washington almost completely flattened in a matter of minutes. Heavy rainfall caused a water main break on Chicago's South Side and the gushing water opened up a sinkhole that engulfed three cars. In some areas of the State homes were affected by landslides from the saturation of rainfall.

In addition to the transportation damage and utilities interruptions, many municipalities had to contend with extensive damage to other public infrastructure. The 2013 storms damaged police, fire and emergency response buildings, vehicles and equipment. The storm created multiple public health issues, including environmental hazards (e.g., mold, lead and asbestos) and unsafe debris. The storm also damaged many public and community buildings, such as town halls, libraries and post offices, among others.

The State, in close partnership with counties and local municipalities, and with support from federal agency partners, have been diligent in performing assessments of the impact of the storms, have already undertaken some repair work, and is designing resiliency plans and other infrastructure programs to mitigate the impact of future storms. The repair and reconstruction of Illinois’ transportation system, utility networks, public health infrastructure, and public and community buildings is critical to the long-term recovery effort.

In addition to the damages reported by individual State agencies through these assessments, the following summaries cite damage estimates from FEMA Project Assistance data current as of March 4, 2014. This data is also used to estimate unmet needs using methods applied by HUD in response to other significant disasters in recent allocations of CDBG funds. This calculation subtracts the total amount in project worksheets which has been deemed eligible for FEMA funds from the overall damage categories and factors in a 25% required local match. For example, if $200,000 of a $1,000,000 project has been deemed eligible, the unmet need of that project is $850,000, calculated as follows: $1,000,000 - $200,000 +(0.25 x $200,000) = $850,000. Hazard mitigation costs are also added to the FEMA data as part of the overall unmet need. The figures for unmet infrastructure needs are preliminary, and it is anticipated that the full cost of repairs and recovery are likely to greatly exceed what is currently reported in the FEMA Project Assistance data. 2-

**2.4.1 Utility Infrastructure**

In the aftermath of the 2013 storms, estimated millions of Illinois residents were without power due to damaged switching and substations, damaged poles and electrical equipment, and downed trees that brought down wires. At least one-third of these residents lacked power for at least six (6) days. Schools, small businesses, and other commercial enterprises did not have power restored, in some cases, for more than a week. Electricity interruption also impacted 9-1-1 facilities, hospitals, nursing homes, long-term care facilities, domestic violence shelters, foster homes, mental health facilities, and other infrastructure that provides critical social services throughout the State.

The loss of electrical power rendered many water systems unable to maintain service. Even at plants where backup generation was available. The vast majority of Illinois community water supply systems were impacted and water systems experienced power loss during the event.

Illinois is taking steps to fully assess the impact to statewide utilities and develop long-term recovery plans. Complete repair and restoration of service is essential. In the long term, it is critical that Illinois electric, natural gas, and water and wastewater systems become more durable and stable to withstand the impacts of severe weather events. In some cases, systems need to be hardened and redundant systems may need to be developed.

**2.4.2 Schools, Parks, and Recreation Infrastructure**

Damage from the storms significantly impacted students and faculty of many Illinois schools. Flood waters and power outages forced many of the States most populated school districts to close for at least four (4) days in April because of record flood levels.

Tornados and flooding also caused damage to Illinois’ State and community parks. Many community parks were closed because of safety concerns. As of December 2013, throughout the State, the damage estimates reflected in FEMA project worksheets was $60,000 to school facilities and $260,708 to parks and recreational facilities.

**2.4.3 Public Health and Safety Infrastructure**

Police buildings, vehicles, and equipment were damaged during the storm. Police departments in areas such as Brookport and Gifford suffered losses. Local fire departments were also impacted.

The 2013 storms created potential public health issues, including mold due to moisture infiltration, lead and asbestos hazards within storm debris, and potential increases in mosquito-borne diseases caused by storm-created conditions that increase mosquito breeding. The storm also deposited debris on both public and private property in areas along the Illinois and Mississippi rivers and more centralized areas of counties and cities from tornados and straight-line winds resulting in widespread immediate health and safety threats to the public-at-large.

**2.4.4 Public and Community Buildings**

Many public and community buildings provide critical services to the neighborhoods in which they reside and are vital to the proper functionality of local government organizations. These types of buildings can include city/town halls, courthouses, libraries, post offices, correctional facilities, day care, family and social service centers and senior care facilities.

As a result, many of the State’s important public and community buildings were damaged, and many of them still cannot be used in their original capacities. A quick and thorough response to repairing these buildings and replacing their contents is critical to Illinois’ recovery. Damage to public and community buildings throughout the State is estimated to exceed $17,000,000 according to FEMA project worksheets as of December 6, 2013.

**2.4.5 Analysis of Unmet Needs**

To estimate the extent of the unmet need in Illinois’ infrastructure, this assessment calculates: a) the cost of repairing storm-induced damage minus the amount eligible for FEMA assistance plus the 25% local match; and b) the cost of implementing hazard mitigation as reported by state agencies as of March 4, 2014. According to this analysis, Illinois infrastructure currently has an unmet need of $19,658,617.

**Section 3 Illinois Goals, Objectives, and Recommendations for Long-Term Recovery**

The State has continued to work with federal, local, nonprofit and other stakeholder partners to assess the nature and scope of damages caused by the 2013 storms. Priorities have been established to facilitate thoughtful and effective recovery, and the State is refining its framework that will streamline recovery in a manner consistent with its priorities. State long-term recovery teams have been established to develop initiatives to lead the State’s housing, economic, infrastructure and health and social service sectors toward recovery. Likewise, other teams have been established to focus on addressing community capacity needs, natural and cultural resources and mitigation opportunities.

**3.1 Long-Term Recovery Recommendations**

The State has taken, and continues to take, steps toward implementing and executing a sustainable and resilient long-term recovery. In accordance with HUD regulations, the State also continues to examine its long-term recovery goals and objectives, which include designing, implementing and administering policies, programs, strategies and streamlined implementation methods informed by post-disaster evaluations and input from citizens, local communities, and other stakeholders. Moreover, consistent with HUD guidance, the State will undertake and promote hazard mitigation techniques and programs and seek to utilize green technologies and practices where doing so is feasible and cost-effective. In addition, the State remains committed to assisting local municipalities by providing resources, technical assistance and targeted programs to support their efforts to recover and rebuild efficiently, effectively and expediently.

The State, through DCEO and in coordination with the Governor’s Office and relevant State departments, will coordinate planning activities with communities statewide to ensure that the long-term planning process benefits Illinois citizens and meets HUD CDBG-DR objectives. These planning efforts will outline the State’s vision to coordinate public and private investments to create economic opportunities and support workforce development. Concurrent efforts will be made to balance the need to preserve open space and promote sustainable communities. DCEO’s Office of Community Development (CD) will work to provide municipalities with sound planning strategies to ensure long term recovery. CD has a staff of qualified planners, managers and economic development professionals who work with municipalities to assist their efforts to effect changes and improve quality of life.

To further assist local governments with recovery, the State has significantly enhanced recovery operations within the Illinois Emergency Management Agency to work with localities and other eligible applicants to maximize and expedite projects funded by FEMA’s Public Assistance program.

The State recognizes that municipalities likely will need assistance to build smart, safe, and strong communities and the State will provide technical assistance as needed. The State has been facilitating discussions between federal agencies, local governments, nonprofits, and other concerned stakeholders regarding long-term recovery needs. The following recommendations were compiled from initial efforts.

**3.1.1. Housing: Long-Term Recovery Recommendations**

As detailed in Section 2, the 2013 storms caused damage to a broad range of Illinois suburban, urban and small communities, and had a substantial negative impact on Illinois families of all income levels. Low and moderate income households were hit especially hard, particularly in the most significantly impacted counties. Based on FEMA Individual Assistance (IA) reports, and as referenced above, approximately 1,725 owner-occupied homes and 3,061 rental units sustained “severe” or “major” physical damage from the storm, as defined by HUD. These figures include only primary owner-occupied residences and year-round rental properties, not damage to seasonal rentals, vacation homes or secondary residences.

To address Illinois’ housing needs, the State will undertake a number of initiatives including:

* Providing funding assistance for reconstruction and rehabilitation programs that focus primarily, but not exclusively, on low and moderate income households
* Developing adequate housing that will meet building standards and incorporate mitigation measures including green technologies where feasible and/or housing elevations which may require construction to FEMA’s Flood Elevation maps
* Providing resettlement and re-occupancy incentives to homeowners contemplating selling or abandoning their homes post-storm
* Developing affordable rental housing across household income levels, with a focus on serving low and moderate income households and priority given to the thirteen counties identified by HUD as most impacted by the storm
* Developing a housing plan for supportive services for special needs populations

**3.1.2 Economic Vitality: Long-Term Recovery Recommendations**

Restoring economic vitality to Illinois businesses and communities is essential for the State’s long-term economic recovery and revitalization. Accomplishing this goal requires opportunities to recover from losses and to spark new economic activity within communities. Economic recovery initiatives following the tornados and floods during 2013 should include grants and loans to small businesses that suffered damage. A broad spectrum of programs should be offered that include support for the varied needs of communities, including housing redevelopment, small business financial and technical assistance, commercial redevelopment or enhancement, tourism marketing, and planning for economic growth.

The State will undertake a number of economic initiatives as part of its recovery, which have included, or will include:

* Focusing on economic revitalization
* Conducting a state workforce study
* Conducting entrepreneurial and small business needs assessments
* Providing grants to eligible small businesses
* Addressing infrastructure improvements in commercial/retail corridors
* Providing unemployment assistance
* Considering Illinois Department of Commerce and Economic Development initiatives
* Considering Illinois Finance Authority initiatives
* Considering Illinois Housing Development Authority initiatives
* Considering other economic/financial incentives for business retention and growth
* Restoring public parks and recreational facilities
* Restoring public streetscapes and public spaces
* Providing workforce training
* Illinois Department of Transportation

**3.1.3 Infrastructure: Long-Term Recovery Recommendations**

Programs for the long-term recovery of infrastructure and public facilities will be coordinated with local and regional efforts and will leverage funding from FEMA Public Assistance and other funding sources. Repairing and restoring public infrastructure that was damaged will involve infrastructure initiatives including:

* Undertaking planning studies to assess strategic infrastructure initiatives inclusive of hazard mitigation plans and incorporating results of planning studies in constructing more resilient infrastructure projects d L
* Developing a match program to subsidize the local cost share of public assistance projects

**3.2 Federal, State, Local, Nonprofit, Private and Individual Sources of Funding to be Leveraged to Fund Unmet Needs**

The State will leverage its CDBG-DR funds with other federal and non-federal funding sources to maximize the impact of disaster relief monies and prevent duplication of benefits. The State will program CDBG-DR funds to address funding needs not satisfied by other funding sources such as FEMA Individual Assistance grants, SBA disaster loans and private insurance. The State also plans to leverage its CDBG-DR dollars with funding from the FEMA Hazard Mitigation Grant Program (HMGP). Additional guidance on this process will be provided at a later date. CDBG-DR funds will complement, not supplant, these resources. The State also will provide technical assistance to ensure that local and county governments exhaust FEMA and other federal funding options prior to providing assistance through CDBR-DR programs.

In addition, through an ongoing focus toward developing and strengthening public-private partnerships with corporations, foundations, nonprofits, and other stakeholders, the State will assist and integrate efforts of the organizations already active, or that will become active in the recovery.

**SECTION 4: Method of Distribution**

Based on the unmet needs assessment in Section 2 and input from impacted communities throughout Illinois, the State has prioritized a portfolio of programs that will assist in meeting the short- and long-term recovery needs of its residents and communities based on the unmet needs data provided by FEMA and SBA. While the impact of the storm was much greater than the resources available under the HUD allocation, these programs will begin to address the unmet needs in owners’ primary residences and rental housing, economic recovery and revitalization, infrastructure, and activities.

The Disaster Relief Appropriations Act of 2013, requires that all CDBG-DR funded activities address an impact of the disaster for which funding was appropriated. The CDBG-DR provisions require that each activity: (1) be CDBG eligible (or receive a waiver), (2) meet a national objective as defined by 24 CFR 570.483, and (3) address a direct or indirect impact from the disaster in counties declared by the President to have been impacted by the disaster. A disaster impact can be addressed through a number of eligible CDBG activities listed in Section 105(a) of the Housing and Community Development Act of 1974, as amended.

The recovery activities herein will make full use of the three national objectives under 24 CFR 570.483 which include benefitting low and moderate income persons, preventing or eliminating slums or blight, and meeting urgent needs to implement a robust and comprehensive recovery for the residents of Illinois.

Additionally, the Quality Housing and Work Responsibility Act of 1998 (Title V of Pub. L. 105 276) and the guidance provided by HUD in the Federal Register (FR-5696-N-01/FR-5696-N-07/FR-5696-N-09) each contain a provision allowing the use of an alternate methodology for determining low and moderate income limits for select jurisdictions.

Unless otherwise stated or expanded upon in the program descriptions below, the various types of recovery assistance will be provided generally on a first received, first-evaluated basis until all available funds are obligated. This method promotes fairness and provides an incentive to apply and begin activities quickly. DCEO will conduct statewide outreach as applicable and reasonable in both English and Spanish regarding the availability of programs and encouraging applications. This outreach will be conducted shortly after HUD approval of the Action Plan and will encourage households, businesses and communities to begin gathering needed application documentation. In addition, DCEO will create partnerships such as with local government agencies, nonprofits, faith-based organizations and other community leaders as needed to conduct local meetings to answer questions about the application process and encourage participation.

All HUD regulations regarding lead-based paint, asbestos removal, environmental, housing quality standards, procurement and other applicable standards apply to these programs.

**Housing Activities**

As of July 1, 2016, no applications have been received for the Housing program, while the State received more applications for Public Infrastructure than they could fund. This Amendment proposes to transfer all remaining project funding to the Disaster Recovery Public Infrastructure program, and fund applications already received until funding is exhausted.

The tornados and floods during 2013 caused significant levels of damage to owner-occupied and rental housing within impacted counties. Based upon the State’s review of the most recent data obtained from FEMA and SBA, the unmet need for housing repair and replacement is excess of $130,000,000. The need for safe, decent, and affordable housing is the State’s top priority, which is why the State has allocated 100% of the programmatic funding from CDBG-DR funds to housing programs. Proposed housing activities are intended to assist homeowners in reconstructing, rehabilitating, and elevating homes within floodplains as well as providing affordable rental housing for persons displaced by the storms. Consistent with federal guidance, the State will allocate CDBG-DR funds to housing-related programs in a manner responsive to data showing how the storm affected, and continues to affect, Illinois households. The State has made available $3,420,000 to programs focused on rebuilding, reconstructing, elevating and mitigating heavily damaged owner-occupied primary residences and supporting homeowner’s decisions to remain in their homes. This figure amounts to approximately 33% of the total amount of CDBG-DR funds for housing programs from the first round of CDBG-DR funding of $3.6 million.

The allocation follows the data. As described in Section 2, using HUD’s methodology for calculating unmet needs based on FEMA Individual Assistance data updated as of March 4, 2014, of the 21,843 residences that sustained “major low or higher” damage as a result of the storms, 14,863 (68%) are owner occupied primary residences. Stated differently, the number of owner-occupied primary residences that experienced “major-low or higher” damage from the storm exceeds the number of rental units that sustained such damage. (This analysis excludes damage to second homes as, per HUD guidance, CDBG-DR funds cannot be used for second homes.) The State is committed to targeting its limited CDBG-DR resources allocated to homeowner programs to focus on the most heavily impacted counties and on primary homes that sustained severe or major damage from the storms.

The State is committed to affirmatively furthering fair housing through its housing programs, following all applicable federal and state statutes and regulations, and vigorously enforcing fair housing laws. As described above, the State will ensure that housing assistance relating to the recovery efforts are prioritized and allocated solely based on disaster-related need, without regard to race or ethnicity. Information relating to demographics of impacted communities will be utilized to ensure that assistance is accessible and reaches Illinois residents in need. In support, the State has worked closely with FEMA and statewide long term recovery groups to assist homeowners in the most impacted counties across the State. Key consideration was made on the geographic location of each group as to accommodate residents affected by the storms, ease of accessibility, projected number of persons served and the level of multilingual services recommended addressing the demographic needs as analyzed for the communities and counties. Illinois will require all replacement and new construction to meet green building standards by requiring compliance with ENERGY STAR™.

**4.1 Homeowner Reconstruction, Rehabilitation, Elevation (HRRE) Program**

The HRRE program is currently accepting applications for the first round of disaster funding. The amendment includes funding from the Public Housing Rehabilitation program that was transferred to the HRRE program. The HRRE program provides grant awards to eligible homeowners for activities necessary to restore their storm-damaged homes, including rehabilitation, reconstruction, elevation and/or other mitigation activities. The program will also provide reimbursement for eligible expenses incurred prior to the implementation of this program.

The HRRE Program provides $3,420,000 towards rebuilding damaged owner occupied homes. The maximum award, to each unit of local government is $500,000 with a maximum of $140,000 for individual assistance (i.e., construction/elevation). The State anticipates this program will assist approximately 25 homeowners. Depending on the number of requests for new construction, the approximate number of homeowners assisted may decline.

**Allocation for Activity:** $0 as of July 1, 2016 (Previously $3,420,000)

**Maximum Award:** $0 as of July 1, 2016 (Previously 500,000)

**Eligible Applicants:** Homeowners whose primary residences sustained substantial, severe or major damage from the storms. The residence must be located in one of the most impacted counties. Because the State has limited CDBG-DR funds, the priorities among eligible applicants listed below are intended to ensure that the focus of where storm damage was the greatest.

**Eligibility Criteria:**

* Home must have been owner-occupied at the time of the storm
* Home must have served as primary residence
* Home must have been in one of the presidentially distressed counties
* Homeowner must have been registered with FEMA
* The HRRE program will follow the reconstruction and rehabilitation standards noted previously

**Criteria for Selection:** Applicants will be placed into categories according to priority. Applicants with low and moderate income, disabled, or elderly categorizations will receive higher priority. Using this priority in conjunction with the amount of damage to their homes, applicants may be eligible for funding. All U.S. Department of Housing and Urban Development (HUD) regulations regarding lead based paint, asbestos removal, environmental, housing quality standards, procurement, labor standards, etc., apply to this program.

**Individual Grant Threshold:** The maximum amount allowed for rehabilitation is $50,000. The maximum amount allowable for reconstruction is $100,000, excluding elevation. The maximum amount allowable for elevation is $40,000. Based on the extent of damage, applicants may be eligible for rehabilitation or reconstruction of their homes. Determination of the type of work to be undertaken will be based on the “75% Rule”. The 75% Rule states that a housing unit is suitable for rehabilitation if the estimated cost of improvements will be less than 75% of the county pre-storm appraisal value as determined by the County Appraisal District. Housing units with an estimated cost of improvement 75% or greater may be eligible for reconstruction. A housing inspector will inspect the damaged unit to determine the cost to repair

**Eligibility:** Section 105(a)(4) Housing and Community Development Act (HCDA) of 1974 as amended, (Section 18. Reimbursement of disaster recovery expenses)

**National Objective:** Low and moderate income, urgent need

|  |  |  |
| --- | --- | --- |
| Housing Related Damages to  Counties under FEMA 2013 Declarations  (By level of Damage, Unmet Need) | | |
| County | **Level of Seriousness** | **Unmet Needs\*** |
| Brown | 0.00 | $0.00 |
| Bureau | 0.00 | $0.00 |
| Champaign | 0.10 | $1,385,378.01 |
| Calhoun | 0.00 | $0.00 |
| Clark | 0.00 | $49,231.18 |
| Crawford | 0.00 | $89.73 |
| DeKalb | 0.00 | $0.00 |
| Douglas | 0.00 | $40,419.03 |
| Fayette | 0.03 | $472,591.00 |
| Fulton | 0.01 | $71,104.51 |
| Grundy | 0.02 | $207,872.92 |
| Henderson | 0.00 | $47,479.36 |
| Henry | 0.00 | $0.00 |
| Jasper | 0.00 | $0.00 |
| Kane | 0.00 | $0.00 |
| Kendall | 0.00 | $32,644.06 |
| Knox | 0.00 | $0.00 |
| Lake | 0.02 | $221,011.26 |
| LaSalle | 0.04 | $614,107.77 |
| Livingston | 0.01 | $83,252.56 |
| Massac | 0.22 | $3,007,487.49 |
| Marshall | 0.00 | $0.00 |
| Mason | 0.02 | $208,602.44 |
| McDonough | 0.00 | $21,872.22 |
| McHenry | 0.00 | $48,114.52 |
| Peoria | 0.04 | $521,642.92 |
| Pike | 0.00 | $0.00 |
| Pope | 0.00 | $57,732.76 |
| Putnam | 0.00 | $0.00 |
| Rock Island | 0.01 | $102,097.15 |
| Schuyler | 0.00 | $0.00 |
| Stark | 0.00 | $5,000.00 |
| Tazewell | 0.39 | $5,433,507.93 |
| Vermillion | 0.01 | $149,009.06 |
| Wabash | 0.00 | $15,940.00 |
| Washington | 0.04 | $535,311.00 |
| Wayne | 0.01 | $125,572.96 |
| Warren | 0.00 | $18,512.39 |
| Whiteside | 0.00 | $0.00 |
| Will | 0.01 | $147,567.23 |
| Winnebago | 0.00 | $0.00 |
| Woodford | 0.01 | $196,639.55 |
|  |  |  |
|  | **Total Unmet Need Identified to Date:** | **$13,819,791.01** |
|  |  |  |

**4.2 Public Housing Rehabilitation**

The Amendment removes the Public Housing Rehabilitation program from the original Action Plan. The Amended Plan adds the $600,000 in proposed funding to the HRRE program.

**4.3 Public Infrastructure**

The State estimates more than $40 million in public infrastructure damage requiring short term recovery assistance in counties declared under Federal DR-4116, DR-4157, DR-1991 and DR-1960. To address this damage, the state has received approximately $35 million in emergency response and immediate recovery assistance through funds made available under FEMA. The difference remaining after FEMA funding is approximately $19 million which represents the current unmet, short term financial needs identified in affected counties to date. In addition to addressing short-term needs, the supplemental appropriation also will support communities in long-term disaster mitigation strategies to avoid the level of damage and serve impacted communities. The table below lists the affected counties and illustrates the estimated financial impact of the damage to public infrastructure/facilities in counties declared under the aforementioned declarations. The extent of the impact to affected areas in Illinois in 2011, 2012 and 2013 made the State one of several eligible for this disaster recovery assistance to address both short and long term recovery, restoration and mitigation needs in these counties.

The following table lists the affected counties and illustrates the estimated financial impact of the damage to public infrastructure/facilities in counties declared under FEMA DR-4116, DR-4157, DR-1991 and DR-1960. They also serve to highlight the extensive damage to public infrastructure in Illinois - FEMA declared counties in 2011, 2012 and 2013.

**Public Facilities/Infrastructure Damage**

**Counties under FEMA DR-4116, DR-4157, DR-1991 and DR-1960**

|  |  |  |
| --- | --- | --- |
| **County** | **Total Unmet Needs** | **Level of Seriousness** |
| Adams | $1,008,448.80 | 0.05 |
| Alexander | $745,317.05 | 0.04 |
| Boone | $83,644.66 | 0.00 |
| Brown | $34,554.08 | 0.00 |
| Bureau | $334,483.72 | 0.02 |
| Calhoun | $335,212.99 | 0.02 |
| Carroll | $68,255.42 | 0.00 |
| Cass | $178,067.44 | 0.01 |
| Christian | $660.01 | 0.00 |
| Clark | $53,004.14 | 0.00 |
| Clay | $8,439.38 | 0.00 |
| Coles | $4,834.72 | 0.00 |
| Crawford | $248,782.14 | 0.01 |
| Dekalb | $136,931.60 | 0.01 |
| Douglas | $0.00 | 0.00 |
| Edgar | $7,813.11 | 0.00 |
| Effingham | $8,523.93 | 0.00 |
| Ford | $26,453.89 | 0.00 |
| Franklin | $143,136.82 | 0.01 |
| Fulton | $387,954.59 | 0.02 |
| Gallatin | $247,111.75 | 0.01 |
| Greene | $46,957.37 | 0.00 |
| Grundy | $464,430.15 | 0.02 |
| Hamilton | $62,683.29 | 0.00 |
| Hancock | $118,236.34 | 0.01 |
| Hardin | $69,776.15 | 0.00 |
| Henderson | $60,610.91 | 0.00 |
| Henry | $79,792.17 | 0.00 |
| Jackson | $264,954.63 | 0.01 |
| Jasper | $6,348.39 | 0.00 |
| Jo Daviess | $66,877.30 | 0.00 |
| Kane | $608,439.78 | 0.03 |
| Kendall | $180,694.05 | 0.01 |
| Knox | $177,977.11 | 0.01 |
| Lake | $3,605,292.09 | 0.18 |
| LaSalle | $984,433.82 | 0.05 |
| Lawrence | $82,541.32 | 0.00 |
| Lee | $68,680.93 | 0.00 |
| Livingston | $114,160.36 | 0.01 |
| Logan | $29,672.96 | 0.00 |
| Macoupin | $3,845.56 | 0.00 |
| Marion | $140,740.78 | 0.01 |
| Marshall | $305,020.96 | 0.02 |
| Massac | $181,651.62 | 0.01 |
| Mason | $28,148.62 | 0.00 |
| McDonough | $297,195.00 | 0.02 |
| McHenry | $677,514.70 | 0.03 |
| McLean | $176,408.04 | 0.01 |
| Menard | $25,603.97 | 0.00 |
| Mercer | $357,364.79 | 0.02 |
| Monroe | $45,435.02 | 0.00 |
| Morgan | $135,270.99 | 0.01 |
| Ogle | $185,341.21 | 0.01 |
| Peoria | $1,017,912.32 | 0.05 |
| Perry | $30,981.83 | 0.00 |
| Pike | $114,161.75 | 0.01 |
| Pope | $46,940.61 | 0.00 |
| Pulaski | $271,923.25 | 0.01 |
| Putnam | $76,071.38 | 0.00 |
| Randolph | $34,279.06 | 0.00 |
| Rock Island | $372,824.76 | 0.02 |
| Saline | $187,562.80 | 0.01 |
| Sangamon | $211,276.39 | 0.01 |
| Schuyler | $165,565.59 | 0.01 |
| Scott | $112,657.49 | 0.01 |
| Shelby | $97,470.23 | 0.00 |
| Stark | $193,165.39 | 0.01 |
| Stephenson | $62,612.35 | 0.00 |
| Tazewell | $471,299.30 | 0.02 |
| Union | $75,480.24 | 0.00 |
| Wabash | $10,036.08 | 0.00 |
| Warren | $112,637.92 | 0.01 |
| Washington | $5,767.64 | 0.00 |
| Wayne | $22,848.28 | 0.00 |
| White | $275,052.89 | 0.01 |
| Whiteside | $76,439.68 | 0.00 |
| Will | $1,244,759.66 | 0.06 |
| Williamson | $139,455.55 | 0.01 |
| Winnebago | $325,003.35 | 0.02 |
| Woodford | $190,700.97 | 0.01 |
|  |  |  |
| **Total Unmet Public Infrastructure Needs Identified to Date:** | **$19,658,617.38** |  |

The CDBG-DR public infrastructure program will support projects that FEMA or other sources cannot fund, but which are nevertheless critical to recovery.

Examples include water/sewer systems, storm drainage system, levee systems damaged by storm/flood in 2011, 2012 and 2013. In addition, roads and bridges needing immediate, short term repair/restoration or which can support long-term flood/storm mitigation efforts.

1. **Allocation for activity:** $9,880,000 combined Round 1 and Round 2 funding
2. **Eligible Applicants:** City and County governments
3. **Threshold Criteria**
   1. Eligible projects will address short or long term public infrastructure needs arising from the 2011, 2012 and 2013 disasters in Illinois
   2. Projects the best alternative to resolve the need
4. **Criteria for Selection:**
5. Demonstrate urgency of the need for the infrastructure activity, or
6. Supports an eligible community with a 51% low to moderate income population, or addresses slum/blight in the affected community, and
7. A demonstrated threat to health, safety, or welfare
8. Insufficient other local, state or federal funds either are unavailable or cannot be obtained on the time frame
9. Use of additional local taxes or user fees in place of the requested assistance would place undue burden on residents, especially low-and moderate income households. All criteria will be weighted equally
10. Able to complete project by June of 2016
11. **Individual Grant Threshold:** $600,000/application. (The Department reserves the right to increase maximum award based on the unique aspects of circumstances surrounding a project application submitted.)
12. **Eligibility:** 105(a)(2)
13. **National Objective:** Must meet either: LMI (51%), urgent need, or slum/blight national objective

**4.4 Economic Revitalization**

Assisting communities in economic recovery and revitalization is imperative. Many of Illinois small businesses sustained physical damage during the storm and/ or short-term and long-term economic losses. These losses are compounded by damage in the housing and infrastructure sectors. Moreover, the vast majority of impacted small businesses have substantial unmet needs, perhaps best reflected by the fact that 93% of SBA business applicants to date have been denied.

The State has developed programs to assist in satisfying many of the unmet needs of the small business sector. In addition to activities which only serve to alleviate direct damage caused by the storm, the State will provide funding for activities that restore and improve local economies through its Community Development Block Grant (CDBG) Community Development Assistance Program (CDAP) and other programs identified by the Illinois Department of Commerce and Economic Opportunity (DCEO).

Illinois will utilize the economic revitalization activities allowed under CDBG to support the resurgence of the economy at the local and State level. For purposes of the programs detailed herein, economic revitalization is not limited to activities that are ‘‘special economic development’’ activities under the HCD Act, or to activities that create or retain jobs. CDBG economic development activity may address job losses, or negative impacts to tax revenues or businesses.

Proposed economic revitalization activities are intended to enable a broad spectrum of activities to support the varied needs of communities recovering from the disaster. Activities supporting the business sector may include small business financial and technical assistance, commercial redevelopment or enhancement, special economic development projects, workforce training, wage subsidies, tourism marketing, planning for economic growth and other activities to catalyze the State’s economic recovery. Because of a wide variation in the structure of industries in these sectors, there is no common size or standard pattern.

Eligible activities also may include infrastructure development for economic purposes as well as mitigation and resiliency to protect and strengthen investments. It is through this comprehensive approach to revitalization that the State will be able to support its communities as they rebuild and grow. Funds will not be used to cover economic loss.

As noted in Section 2 of this Action Plan, HUD, in its methodology for assessing economic unmet needs, acknowledges that there is a substantial gap in the financial assistance needs of small businesses and the ability for initial federal recovery resources to cover these needs. Initial programs developed by the State will be aimed at rapidly providing funds for operating expenses and commercial rehabilitation to small businesses that are experiencing time-critical cash flow issues resulting from the storm. Financial assistance will also provide catalytic resources to small and medium-sized businesses to support economic recovery.

The funding limits identified for the following programs to be administered by the Office of Community Development are considered suggested amounts and may be reallocated among these programs based on demand and need.

**4.5 Planning, Oversight and Monitoring**

The State must certify and have in place proficient financial controls and procurement processes, adequate procedures to prevent any duplication of benefits as defined by Section 312 of the Stafford Act, processes to ensure timely expenditure of funds, maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, processes to detect and prevent waste, fraud, and abuse of funds, perform environmental reviews on every project and ensure all projects are compliant with the Uniform and Relocation Act, Davis-Bacon and other labor standards, Fair housing, Section 3, Part 85 and other federal laws. Proper oversight and administration ensures reduction in concerns or findings from HUD. Findings from the Federal Government can require repayment of CDBG disaster funds back to HUD. Additional oversight and monitoring activities are described in Section 6.

The HUD appropriation regulation for the CDBG-DR funds requires the State to examine its goals and objectives to promote sound, sustainable long-term recovery planning that is informed by a post-disaster evaluation and coordinated with other local and regional planning efforts.

**4.6 Pre-Agreement Costs**

Illinois will follow provisions of 24 CFR 570.489(b) which permits the State to reimburse itself for otherwise allowable costs incurred by itself or its recipients, subgrantees or subrecipients (including public housing authorities) on or after the incident date of the covered disaster. Section 24 CFR 570.200(h)(1)(i) will not apply to the extent that it requires pre-agreement activities to be included in a consolidated plan. All the pre-agreement costs such as engineering, planning, administration, and program delivery are exempt from the environmental process in accordance to 24 CFR 58.34.

**SECTION 5: Performance Schedule**

To satisfy HUD guidance in the Federal Register (FR5696-N-07, FR5696-N-01 and FR5696-N-09), Illinois will amend its Action Plan within 90 days to provide detailed performance metrics. The performance metrics will be based on quarterly expected expenditures and outcomes. When performance metrics are not met by service providers, penalties against those providers will be assessed.

The Action Plan must contain estimated and quantifiable performance outcome factors. The below table illustrates the currently estimated outcomes per funding category. These estimates are preliminary and likely will change.

Factors that may affect performance measures include completing federally required environmental and historical reviews, contractor availability, weather, and availability of other funding sources. These and other potential factors will be important in finalizing and meeting proposed performance metrics. The State anticipates that HUD will provide flexibility to extend timelines based on these and other relevant factors. The State will also work closely with HUD to determine the fund draw schedules consistent with implementation and construction schedules identified in the Action Plan. At this time, the State of Illinois is committing 100% of its allocation of CDBG-DR funding for the programs listed in this Action Plan. The State is requesting that HUD obligate 100% of those funds as of the approval of this Action Plan.

**SECTION 6: Other Criteria**

**6.1 Promotion of High Quality, Durable, Energy Efficient, and Mold Resistant Construction Methods**

Newly constructed or substantially rehabilitated housing units must meet all locally adopted and enforced building codes, standards, and ordinances. Illinois has adopted the 2009 International Residential Code, which provides for quality, durable, energy efficient and mold resistant construction. Housing rehabilitation and reconstruction activities will be designed to achieve maximum energy efficiency to the extent achievable on a cost-effective basis, considering construction and operating costs over the life cycle of the structure. Efficiency may be demonstrated through design based on LEED, ENERGY STAR™, and/or other comparable guidelines and rating systems. Construction methods should comply with local building codes and incorporate mold resistant construction materials.

**6.2. Steps the State Will Take to Encourage Adequate, Flood-Resistant Housing for All Income Groups**

Illinois' flood disaster task force is currently assessing strategies for long-term recovery, flood mitigation, economic development and other needs to support communities throughout the state that have been impacted significantly by flooding and storm-related disaster.

This funding, approved for Illinois and other states, was put in place to support fairly urgent, if not immediate needs across communities that were impacted primarily in 2011-2013 by flood and storm-related disasters. The eligible project activities identified by this proposal will not conflict with the long-term strategies under consideration by the Illinois disaster recovery task force. The activities outlined for the 2013 CDBG-DR 4116, DR-4157, DR-1991 and DR-1960 disaster funding can support both longer and short-term flood recovery objectives for Illinois.

In areas where a flood-related disaster was federally declared, DCEO will supplement FEMA resources in place for housing and home repair assistance, by providing CDBG disaster recovery resources and in some cases with a 25% CDBG disaster recovery program cost share. Currently, the state is working with over thirty communities' long-term recovery committees to assist residents with long-term housing assistance to meet unmet disaster- related housing needs whenever feasible.

The Illinois Emergency Management Agency (IEMA) is coordinating, collaborating, communicating and cooperating with many government and private agency partners to bring in funds, volunteers, materials and other resources to assist people in relocating, rebuilding, repairing, or appropriately addressing their housing needs. Homeless shelters and transitional housing units impacted by the recent flooding are eligible for assistance through this plan, when these facilities are located outside the 100-year flood plain and are in the presidentially declared counties for FEMA 4116 and 4157. Homeless and transitional facilities that are (or were) located within Illinois' 100 year flood plain, could be eligible for assistance in rebuilding outside the flood plain.

**6.2.1 Special Needs Populations**

Currently, the State provides housing for special needs populations through the following agencies: the Department of Human Services, Department of Commerce and Economic Opportunity, Illinois Housing Development Authority, the Department of Public Health, and the Department of Children and Family Services. The State will implement a series of programs designed to afford special needs populations access to affordable, long-term housing.

**6.2.2 Homeless and Special Needs Support**

Based on the unmet needs identified in Section 2, the State has existing programs to support special needs populations, including: homeless populations, households at risk of becoming homeless, persons with disabilities, older adults, and other special needs. These programs include but are not limited to: residential services for group homes, apartments and family care homes, and programs to assist individuals who are homeless or at imminent risk of becoming homeless. The Department will continue to provide these services, focusing additional resources as appropriate to solve storm-related issues.

**6.2.3 Public Housing and HUD Assisted Housing Support**

Disaster response data provided through outreach efforts to Public Housing Authorities in the affected areas of the State of Illinois was minimal. This is due in part to federal requirements that Public Housing Authorities and Indian Housing Agencies maintain adequate property/casualty insurance as required under the Annual Contribution Contract (ACC) executed by HAs and the United States of America, for the Public and Indian Housing Programs.

**6.3 Green Building**

The State will require replacement and new construction to meet green building standards by requiring compliance with ENERGY STAR™. Illinois will further encourage green building practices throughout all other proposed programs. Illinois and its grantees can use Green.illinois.gov as a resource for green building practices or contact the Illinois Capital Development Board for additional information on the Green Building Act for State Construction, which was based on guideline mandates that all state-funded building construction and major renovations of existing state-owned facilities are required to meet current Leadership in Energy and Environmental Design (LEED) standards that are practical for that project. The Capital Development Board (CDB), which manages all state construction, repair and renovation projects, developed the new guidelines and will oversee their implementation.

**6.4 Program Income**

The State will comply with HUD requirements found in 24 CFR 570.489. In the event the State’s activities generate program income, those funds, to the maximum extent feasible, shall be distributed before the State makes additional withdrawals from the Treasury.

**6.5 Monitoring Standards and Procedures**

DCEO Office of Community Development will oversee all activities and expenditures of the CDBG-DR funds. Existing State employees will be utilized and additional personnel and contractors may be hired to aid in the administration of, and to carry out, recovery programs. Not only will these personnel remain involved in ensuring that there are layers of financial control, they also will provide technical assistance to the State, and will undertake administrative and monitoring activities to better assure compliance with applicable requirements, including, but not limited to, meeting the disaster threshold, eligibility, national objective compliance, fair housing, nondiscrimination, labor standards, environmental regulations, and procurement regulations at Part 85.

Each activity funded will meet the disaster threshold and one of HUD’s three national objectives, with emphasis on achieving the primary national objective of benefiting low and moderate income persons, and will be an eligible activity. DCEO staff will perform the monitoring in accordance with a DCEO CDBG-DR monitoring plan.

DCEO will maintain a high level of transparency and accountability by using a combination of risk analysis of programs and activities, desk reviews, site visits, and checklists modeled after HUD’s Disaster Recovery Monitoring Checklists and existing monitoring checklists used in monitoring regular program activities. DCEO will determine appropriate monitoring of grants, taking into account prior CDBG-DR grant administration performance, audit findings, as well as factors such as the complexity of the project.

The primary purpose of the State’s monitoring strategy is to ensure that all projects comply with applicable federal regulations and are effectively meeting their stated goals. The frequency and areas monitored will be determined by a risk analysis. All projects will be monitored at least once on-site during the life of the activity. The results of monitoring and audit activities will be reported to the Office of Accountability at DCEO.

The DCEO will determine the areas to be monitored, the number of monitoring visits, and their frequency. Community and State agencies will be provided training and technical assistance if requested, or if the DCEO determines that in-house or on-site monitoring is needed.

The State will continue to follow all guidelines it uses to monitor projects funded under the regular CDBG program. The monitoring will address program compliance with contract provisions, including, but not limited to environmental reviews, fair housing, Section 3 compliance, compliance with the Davis-Bacon Act as well as other labor standard provisions, procurement regulations, fair housing and equal opportunity requirements, and compliance with the OMB A-87, program income, and other CDBG financial requirements. The State plans to retain all program income but may allow certain grantees to retain program income to continue eligible CDBG-DR activities. These policies and procedures are consistent with those used by HUD to monitor state-administered entitlement programs. All necessary environmental reviews shall be performed on each project prior to funding.

**6.5.1 Administration and Staffing**

DCEO is establishing a Disaster Recovery unit in the Office of Community Development focused on the administration of the recovery programs. Tasks will include ensuring overall program direction, financial controls, procurement, outreach and communications, compliance, information management, and recovery subject matter experts in program operations and budgets. In addition, DCEO is developing detailed written process maps and program guidelines to direct the work of all staff and subrecipients for each program. DCEO is adapting existing procedures to cover all crosscutting topics such as Davis Bacon, Fair Housing, Section 3 and file management for disaster recovery. The recovery staff will also provide technical assistance to grantees, and undertake monitoring activities to ensure compliance with applicable requirements. These regulations include, but are not limited to: fair housing, nondiscrimination, labor standards, environmental regulations, and procurement. The Office of Community Development will expand upon its existing staff with persons experienced in managing CDBG, NSP, Weatherization, and several federal and State community development, housing, and local government programs.

**6.5.2 Reporting**

Each awarded applicant will report information necessary and relative to the status of its activities, and other information as required by HUD. Additional reporting requirements (i.e., annual audits, contractual obligations, labor and minority business enterprise reports, as applicable) will be specified in the contract documents.

**6.5.3 Prevention of Duplication of Benefits**

As provided by the Stafford Act, duplication of benefits is prohibited in accordance with the HUD Federal Register 5696-N-01/5696-N-07. DCEO will continuously monitor, or cause to be monitored, for compliance with this requirement. FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies will be contacted and data sharing agreements put into place to ensure that there is no duplication of benefits occurring within the various programs.

**6.5.4 Floodplain Restrictions**

Floodplain restrictions will be monitored closely. Funds may not be used for persons who have received previous federal assistance (including loans) where the purchase and maintenance of flood insurance was a requirement, and the individual has allowed his or her flood insurance to lapse. In addition, all grantees must inform participating property owners of any future requirements related to the purchase and maintenance of flood insurance.

No funds will be used for activities in areas delineated as a Special Flood Hazard Area 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.

**6.5.5 Additional Steps to Avoid Occurrence of Fraud, Abuse and Mismanagement**

*Background*

An integral part of an effective system of internal controls includes the assessment of the overarching system of internal controls, specifically those controls designed to prevent and detect fraud. As required by the Fiscal Control and Internal Auditing Act (Act) (30 ILCS 10/1002), “It is the policy of this State that the chief executive officer of every State agency is responsible for effectively and efficiently managing the agency and establishing and maintaining an effective system of internal control.” In order for the Department of Commerce and Economic Opportunity (DCEO) to meet the intent of the Act and to strengthen its internal control system to safeguard state resources, DCEO developed a comprehensive fraud risk assessment program.

*Fraud Risk Assessment Overview*

The management of DCEO is responsible for the development of internal controls to prevent and detect fraud. In order to meet its responsibility under the Act, DCEO established an agency-wide fraud policy to facilitate the evaluation and development of internal controls that will aid in the detection and prevention of fraud against the Department. The fraud risk assessment policy can be found on DCEO’s portal.

*Fraud Risk Assessment Purpose*

The purpose of the annual fraud risk assessment is to identify fraud risks and the associated internal controls designed to prevent and/or detect fraudulent activity. It is DCEO’s intent to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls to minimize the risk of fraud by employees, vendors, and other parties conducting business with DCEO.

*Risk Assessment Program*

As part of the fraud risk assessment program, the Chief Accountability Officer (CAO) of DCEO directs an annual fraud risk assessment survey to identify fraud risks and the internal controls in place to prevent and/or detect fraud. For each identified fraud risk that does not have a corresponding control, the offices must identify and establish an action plan to design and implement internal controls to mitigate the identified fraud risk. These controls and associated risks are reevaluated on an annual basis within a structured fraud risk assessment process.

*Fraud Risk Assessment Procedures*

Annually, a fraud risk assessment is conducted and overseen by DCEO’s CAO. This assessment should occur near or about the same time as the Department's annual evaluation of administrative and fiscal controls as required by the Fiscal Control and Internal Auditing Act.

Each DCEO office’s deputy or managing director and/or designee is responsible for assessing the risk of fraud occurring within his/her office’s programs and for completing the annual risk assessment. The director of each office and/or a designee will be given access by the CAO to the previous year’s fraud risk assessment as a basis to begin the current year assessment. The CAO can be contacted for support during the assessment process. Completed fraud risk assessments are completed in the portal, as instructed. The annual fraud risk assessment will involve reviewing the fraud risks previously identified and making any appropriate updates or additions then certifying that the fraud risk assessment has been completed for the year. The fraud risk assessment in the portal will contain the most recent information for each office within the Department.

As each director and/or designee begins the annual fraud risk assessment process, there are several factors that should be considered and discussed within each office. These factors may include new programs, addition/removal of key personnel, Department reorganization, software changes, new reporting requirements and regulations, and changes in office objectives. It is also important that the director and/or designee consider changes in the operations of both the office and the Department overall from the previous assessment.

Once the fraud risks have been identified, each director and/or designee must determine the likelihood of each risk occurring and the potential impact. Risk likelihood includes a determination of whether the potential fraud identified is remote, probable, or likely to occur. Evaluation of the impact includes determination of whether the effects of the fraud, if it occurred, would be high, medium or low in relation to the State, the agency, or the program and could be quantitative or qualitative in nature.

The identification of applicable controls designed to prevent or detect the identified fraud must be classified in one or more of the following categories: preventive, detective and/or mitigating. Based on the identified control and the control category, the effectiveness of the control must be considered. If the current controls are highly effective, no additional controls may be necessary at this time. If controls are less than highly effective, the director and/or designee must consider strengthening current controls or implementing additional controls to reduce the risk of the identified fraud from occurring or going undetected.

Once fraud risk assessments are completed, they are made available using the portal to the CAO for review. The deputy or managing director must “certify” the submitted information to attest to its validity. If the “certification” box is checked, it is assumed the deputy or managing director has reviewed and approved the completed assessment.

**6.6 Increasing Capacity at the Local Level**

Technical assistance and training will be provided to units of local governments and State agencies with a role in administering and implementing CDBG-DR programs. Through both in-house staff and engaged consultants, DCEO Office of Community Development will provide initial training to all grantees on CDBG-DR regulations, reporting requirements, payment procedures, and monitoring compliance. Office of Community Development will also assign disaster recovery program staff to each unit of local government to provide continued Technical Assistance (TA) throughout the program. Additionally, the compliance and monitoring staff and/or consultants will regularly visit grantees to enhance capacities and ensure knowledge transfer.

Applications and guidelines for local government programs will be issued by the Office of Community Development. Other State or federal agencies will be asked to review and comment on applications, as appropriate.

**6.7 Substantial Amendments to Action Plan**

The following events would require a substantial amendment to the Action Plan:

* Change in program benefit or eligibility criteria
* A new allocation or re-allocation of more than $1,000,000
* The addition or deletion of an activity

A substantial amendment to the State of Illinois Action Plan will follow the same requirements as the publication of the original action plan in accordance to the Citizen Participation Plan.

**6.8 Citizen Participation**

Citizen participation is an essential component of the State’s planning effort. The State strongly encourages public participation to identify community needs. Citizens and other stakeholders are given an opportunity for reasonable and timely access to information and comment period relating to the Action Plan, any ensuing substantial amendments, and the use of CDBG-DR Funds under the Disaster Recovery Program.

The State is committed to providing access to the Action Plan programs for all its citizens. These efforts include special consideration for those with limited English proficiency (LEP) and persons with disabilities. The State performed the four-factor analysis prescribed in the Federal Register 72 FR 2732. As a result of the analysis, the Action Plan and any ensuing substantial amendments will be published in both English and Spanish. Key participant documents such as application forms will also be available in both English and Spanish. No language other than Spanish exceeds 16% of the population statewide.

To ensure meaningful access to vital documents for participant information, the State will respond to identified language needs in making translation available as requested and reasonable in other languages, based on the analysis within noted communities and counties. Based on analyzed needs and requests, DCEO will conduct additional informational meetings in LEP communities in Spanish and other languages, as reasonable, in order to assist these households to apply for assistance.

Individuals with disabilities may request auxiliary aids and service necessary for participation by contacting (TTY/TDD) 800-526-0844 or 800-501-0864 (Spanish). Program application procedures will also follow prescribed guidelines to ensure access for individuals with disabilities. As requested, application and other key materials will translated into Braille and other formats for persons with visual impairment.

**6.8.1 Citizen Participation Plan**

The State has been in constant communication with its residents, local leaders, and other stakeholders immediately following the disasters. This continuous outreach has helped identify the needs and priorities of the many communities affected throughout the State, and inform the programs set forth in this Action Plan.

State personnel have been providing ongoing support to the hardest hit communities following the storm. State officials also have held frequent calls and meetings with impacted communities to discuss, among other things, the storm’s effects on Illinois housing stock, infrastructure, and business community.

**6.8.2 Citizen Complaints**

The State, sub-grantees and recipients, if any, will establish procedures for responding to citizens’ complaints regarding activities carried out utilizing these CDBG-DR funds. Citizens will be provided with an appropriate address, phone number, and times during which they may submit such complaints. The State and sub-grantees will provide a written response to every citizen complaint within 15 working days of the complaint.

**6.8.3 Comment Period**

A formal public comment period opened on July 25, 2016 and will end August 25, 2016. Comments to the proposed Action Plan Amendment are accepted during the public comment period, with email submittals via [ceo.cdbg@illinois.gov](mailto:ceo.cdbg@illinois.gov). The proposed Action Plan Amendment is posted on the DCEO website.

The public hearing will be held at the Illinois Housing Development Authority, 401 N. Michigan Ave., 7th Floor Board room in Chicago on Tuesday, August 9, 2016 at 1:00 p.m. and via televideo-conferencing at the following 2 locations: Department of Commerce and Economic Opportunity (DCEO)-4th Floor Conference Room, 500 East Monroe, Springfield; and the Illinois State Regional Office Building-Conference Suite 106, 2309 West Main Street, Marion. All three offices are fully accessible to persons with physical disabilities.

**SECTION 7: Overview of Grant Process for State Approval**

* State of Illinois Department of Commerce responds to public comments and submits Disaster Recovery Action Plan Amendment to the U.S. Department of Housing and Urban Development (HUD) on September 1, 2016.
* HUD Review of State of Illinois Action Plan Amendment (allotted 45 days from date of receipt; however, completion of review is anticipated much sooner) and approves the Plan according to Federal Register requirements
* HUD sends an Action Plan approval letter, grant conditions, and signed grant agreement to the State of Illinois
* State enters program data into Federal system
* State opens program to receive applications from communities impacted by the storms

**APPENDIX**

Method of Distribution-Table Summary A

APPENDIX A

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Illinois CDBG Disaster Recovery Program** | | | | |
| **Method of Distribution-Table Summary (Sum of Round 1 and 2 CDBG-DR funding)** | | | | |
| **Program Category** | **Budget (%)** | **Budget ($)** | **Grant Ceiling** | **Application Process** |
| *State Administered Programs*: |  |  |  |  |
| Homeowner Reconstruction, Rehabilitation, Elevation and Mitigation (RREM) Program | 0% | $0 |  | Closed |
| Public Infrastructure | 95% | $9,880,000 | $600,000\* | Ongoing |
| Administration | 5% | $520,000 |  |  |
| **Total Combined Allocation of 1st and 2nd round CDBG-DR funding** |  | **$10,400,000** |  |  |

\*DCEO reserves the right to increase maximum award based on the unique aspects or circumstances surrounding a project application submitted.

**Federally-Designated Areas Eligible for CDBG-DR Assistance**

The following Illinois counties were declared eligible for federal assistance in the four 2013 Disaster Declarations:

**Illinois Counties Declared Under FEMA-4157-DR**

|  |  |
| --- | --- |
| 1. Champaign County | 9. Tazewell County |
| 2 Douglas County | 10. Vermillion County |
| 3. Fayette County | 11. Wabash County |
| 4. Grundy County | 12. Washington County |
| 5. Jasper County | 13. Wayne County |
| 6. LaSalle County | 14. Will County |
| 7. Massac County | 15. Woodford County |
| 8. Pope County |  |

**Illinois Counties Declared Under FEMA-4116-DR**

|  |  |
| --- | --- |
| 1. Adams County | 25. Livingston County |
| 1. Brown County | 26. Marshall County |
| 1. Bureau County | 27. Mason County |
| 1. Calhoun County | 28. McDonough County |
| 1. Carroll County | 29. McHenry County |
| 1. Cass County | 30. Mercer County |
| 1. Clark County | 31. Monroe County |
| 1. Cook County | 32. Morgan County |
| 1. Crawford County | 33. Ogle County |
| 1. DeKalb County | 34. Peoria County |
| 1. Douglas County | 35. Pike County |
| 1. DuPage County | 36. Putnam County |
| 1. Fulton County | 37. Rock Island County |
| 1. Greene County | 38. Schuyler County |
| 1. Grundy County | 39. Scott County |
| 1. Hancock County | 40. Shelby County |
| 1. Henderson County | 41. Stark County |
| 1. Henry County | 42. Tazewell County |
| 1. Kane County | 43. Warren County |
| 1. Kendall County | 44. Whiteside County |
| 1. Knox County | 45. Will County |
| 1. Lake County | 46. Winnebago County |
| 1. LaSalle County | 47. Woodford County |
| 1. Lawrence County |  |

**Illinois Counties Declared Under FEMA-1960-DR**

|  |  |  |  |
| --- | --- | --- | --- |
| 1. | Adams | 32. | Lake |
| 2. | Bond | 33. | LaSalle |
| 3. | Boone | 34. | Lee |
| 4. | Brown | 35. | Livingston |
| 5. | Bureau | 36. | Logan |
| 6. | Calhoun | 37. | Marion |
| 7. | Carroll | 38. | Marshall |
| 8. | Cass | 39. | McDonough |
| 9. | Christian | 40. | McHenry |
| 10. | Clark | 41. | McLean |
| 11. | Clay | 42. | Menard |
| 12. | Coles | 43. | Mercer |
| 13. | Cook | 44. | Morgan |
| 14. | Crawford | 45. | Moultrie |
| 15. | Cumberland | 46. | Ogle |
| 16. | DeKalb | 47. | Peoria |
| 17. | Douglas | 48. | Pike |
| 18. | DuPage | 49. | Richland |
| 19. | Edgar | 50. | Rock Island |
| 20. | Effingham | 51. | Sangamon |
| 21. | Fayette | 52. | Scott |
| 22. | Ford | 53. | Shelby |
| 23. | Fulton | 54. | Stark |
| 24. | Grundy | 55. | Stephenson |
| 25. | Hancock | 56. | Tazewell |
| 26. | Henderson | 57. | Warren |
| 27. | Henry | 58. | Washington |
| 28. | Jasper | 59. | Whiteside |
| 29. | Jo Daviess | 60. | Will |
| 30. | Kane | 61. | Winnebago |
| 31. | Knox | 62. | Woodford |

**Illinois Counties Declared Under FEMA-1991-DR**

|  |  |
| --- | --- |
| 1. Alexander County | 12. Pope County |
| 2 Franklin County | 13. Pulaski County |
| 3. Gallatin County | 14. Randolph County |
| 4. Hamilton County | 15. Saline County |
| 5. Hardin County | 16. Union County |
| 6. Jackson County | 17. Wabash County |
| 7. Jefferson County | 18. Washington County |
| 8. Lawrence County | 19. Wayne County |
| 9. Marion County | 20. White County |
| 10. Massac County | 21. Williamson County |
| 11. Perry County |  |







