COLORADO
Action Plan for Disaster Recovery

Disaster Relief Appropriations Act, 2013
Public Law 113–2

STATE OF COLORADO: ACTION PLAN FOR DISASTER RECOVERY

Section 1: Introduction

In September 2013, Colorado suffered catastrophic flooding as a result of unprecedented rainfall across twenty-four counties in the State. High-velocity floodwater racing down the mountain corridors resulted in 10 lost lives and caused more than 8,000 people to evacuate their communities. The water ripped apart homes and carried debris across rivers, roads, and miles downstream to neighboring communities. Families, including many of low to moderate income, had to abandon their homes and entire homes were isolated as a result of significant damage to roads and bridges. The September floods impacted the entire social fabric of the State, causing major destruction to housing, businesses, and infrastructure.

Immediately after the floodwaters receded, Colorado began the short and long-term recovery processes. The State, local communities, and volunteer citizens came together to support the most affected areas in an effort to restore basic services and address conditions of imminent danger. Emergency management teams, faith-based volunteer groups, volunteer fire departments, and other organizations helped to remove mud, sand, and large debris from river channels. Local governments and civic leaders continue to face tremendous burdens to meet fiscal, social and environmental challenges greater than they have seen before.

Colorado faces a monumental ongoing recovery effort. An estimated 28,363 dwellings were impacted by floodwaters, 1,852 homes were destroyed. Contaminated drinking water systems pose a threat to public health, and sewage, industrial runoff, and pollutants have seeped into the environment. Residents and business owners were impacted by "no-flush" mandates in response to wastewater system damage. The geographic environment was fundamentally altered as floodwaters re-charted entire river channels. Erosion was, and continues to be, of significant concern; if left unaddressed, unstable slopes cause structures to be unsafe for habitation, even if the structures themselves appear unharmed. The velocity of the flood water racing through our mountain canyons caused large amounts of debris and sediment to accumulate in the stream corridors. This debris has not been removed. Colorado is expecting a substantial spring runoff due to above-average snowpack. Failure to remove the debris in the stream corridor poses a threat to life and infrastructure through a future flooding event. Colorado's low income communities are particularly at risk because they lie in the path of potentially surging waters. This unique element of the disaster adds urgency to our recovery efforts.

Colorado's economy was profoundly impacted. Agriculture and tourism, Colorado's two biggest economic drivers and two industries serviced by the low to moderate income population, suffered enormous economic loss. The agricultural sector lost irrigation ditches vital to the livelihood of farmers and ranchers, creating lasting impacts to an industry dependent on access to water. In other sectors of the economy, businesses not only received direct damage to their facilities, but were challenged by lack of access to their establishments and employees whose lives were disrupted. Hundreds of oil and gas wells were shut down. The tourism industry, a substantial contributor to the Colorado economy,

suffered due to the fact that major tourist locations such as Rocky Mountain National Park were cut off from access, thereby, impacting communities dependent on hotel, restaurant and transportation income generated by visitation.

The Disaster Relief Appropriations Act of 2013 (Public Law 113-2, approved January 29, 2013) was enacted to appropriate federal funds for disaster relief. The Act gives monies to different government agencies that are to assist in the disaster recovery efforts for the affected areas. The federal government appropriated $16,000,000,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to be given to the various states that were declared a major disaster by the President of the United States in 2011, 2012, and 2013 respectively. These funds are to be used in order to satisfy a portion of unmet needs that still remain after other federal assistance such as the Federal Emergency Management Agency (FEMA), Small Business Administration (SBA), or private insurance has been allocated. HUD uses the "best available" data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure, and housing and economic revitalization. **Based on this assessment, HUD notified the State of Colorado that it will receive an initial allocation of $62,800,000 in disaster recovery funds to assist in recovery from the floods.**

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within two years of the signed agreement between HUD and the grantee unless an extension is granted by HUD. In order to ensure that the funds assist the most impacted areas, 80 percent of the combined total awarded to the State will go to the most impacted and distressed counties. This means that Colorado must spend a minimum of $50,240,000 combined in the counties of Boulder, Larimer, and Weld. All of the allocated funds must be used for eligible disaster-related activities. To ensure that fraud, waste, and misuse of funds does not occur, effective controls must be in place and monitored for compliance. As a requirement by HUD, Colorado submits this Action Plan to outline its unmet needs, as well as how the State will allocate its funds through its programs.

The Colorado Department of Local Affairs has been designated by Governor John W. Hickenlooper as the responsible entity for administering these CDBG-DR funds allocated to the State. This Action Plan was developed with the help of many state and local stakeholders in order to best target the portion of the unmet need that can be addressed by this limited federal assistance.

Section 2: Needs Assessment

Summary of Impact and Presidentially Declared Counties

The 2013 Colorado floods had a catastrophic impact on the State, with unprecedented rainfall impacting 24 counties, causing the evacuation of more than 18,000 people. In September 2013, the entire Front Range of Colorado was hit by rainfall amounts over five days that neared totals for annual precipitation. Over seventeen inches of rain fell in Boulder County, impacting the entire county. Access to the Town of Lyons was cut off by the surging of St. Vrain Creek, and the communities of Estes Park, Jamestown, Loveland, Drake, Longmont, Glen Haven, Greeley, and Evans were also amongst the many other areas severely impacted.

Unique Nature of Mountain Communities

Colorado has a history of facing challenges from natural hazards. For example, many of the small communities impacted by the floods are located in the wildland/ urban interface and are accustomed to taking preventive measures related to fire risk. The High Park Fire and Waldo Canyon Fire of 2012 damaged approximately 500 homes, and the Black Forest Fire and West Fork Fire Complex in 2013 damaged a combined 114,000 acres of land. The steep canyons, forested hillsides and creeks and rivers that add to Colorado's natural beauty also create unique hazards not shared by coastal lowlands. Floodplain areas are smaller and narrower and are directly related to streams and rivers. When the September rain event took place, high velocity floodwaters carried mud, sand, trees and boulders downstream. The rains compounded the previous effects of recent fires. Many of the structures affected were not in the floodplain, as entire streambeds changed course. As the State looks to recover, elevating structures to BFE + 1 on a mountain slope will have entirely different complexities than low-lying coastal areas on flat terrain. Colorado will ensure new construction and substantially rehabbed properties are at a minimum BFE plus one foot unless the mountainous terrain necessitate additional measures to flood-proof the properties as determined by local code.

Below is a description of Colorado's unmet needs through January 2014. The State's initial assessment of total flood-related damages is approximately $3.36 billion. This includes impact to housing, infrastructure and economic sectors. We are working closely with the federal state, and local partners, to identify unmet needs and will continue to submit waivers and amendments to HUD as those needs arise. The State's ongoing unmet needs assessment will include information from local unmet needs committees, federal funders workshops, local long-term recovery groups, and information from World Renew. In connection with a second allocation of funds, the State will conduct a second comprehensive unmet needs assessment and will be submitting a second action plan to address those needs. We will also continue working closely with HUD on future amendments and action plans.

The United States Department of Housing and Urban Development (HUD) issued notice of a $62,800,000 allocation of federal recovery funds to the State of Colorado on December 16, 2013. The funds, issued through the Community Development Block Grant-Disaster Relief (CDBG-DR) Program,

are allocated for the purpose of assisting recovery in the most impacted areas. The State of Colorado must expend at least 80 percent of the $62.8 million allocation, or $50,240,000, in Boulder, Weld and Larimer counties, three of the eleven counties designated as Presidential Disaster Areas for FEMA individual assistance. The remaining 20 percent, ($12,560,000) is to be used for disaster recovery in any and all counties declared a Presidential Disaster Area. These include the following:

Counties Approved for FEMA Individual Assistance under 4145-DR: 11
Adams, Arapahoe, Clear Creek, Boulder, El Paso, Fremont, Jefferson, Larimer, Logan, Morgan and Weld.

Counties Approved for FEMA Public Assistance under 4145-DR: 18
Adams, Arapahoe, Boulder, Clear Creek, Crowley, Denver, El Paso, Fremont, Gilpin, Jefferson, Lake, Larimer, Lincoln, Logan, Morgan, Sedgwick, Washington and Weld.

Although HUD utilizes best available data to calculate the allocation and estimate remaining unmet need, it is the State's obligation to expand upon the initial federal assessments in order to provide a more profound representation of the true impact of the floods.

This Needs Assessment represents the State of Colorado's preliminary calculation of financial impact to the State and its residents, caused by the September floods and will explore in detail the components of the $3.35 billion estimate. In accordance with HUD requirements to determine the gap between funding already received and the remaining "unmet need," recovery resources already received will be accounted for and subtracted from the estimate of impact. As with any natural disaster of significant magnitude, however, compiling and accessing up-to-date data on financial and social indicators is one of the greatest challenges of recovery. Affected residents may not yet have made their way to providers of social services. Tax rolls may not fully reflect local losses due to the lag in reporting time caused by quarterly reporting schedules. Business and job losses and their corresponding economic ripple effects often take time to fully manifest themselves as owners use savings to keep themselves operational. **Because of the fluidity of these factors, this preliminary Needs Assessment is very much a living document and will be updated as additional information is made available.** For portions of the assessment, proxy indicators are used to infer impact where other data are unavailable or are still being compiled.

The State's examination of impact and unmet need is organized into three major categories. These categories are housing, infrastructure and economic recovery. In order to produce these figures, the State compiled and analyzed data provided by state, federal, and local stakeholders. Data include reports from the Federal Emergency Management Agency (FEMA), the Small Business Administration (SBA), reports from civic organizations, and detailed surveys from local entities. These figures will be updated as new data become available.

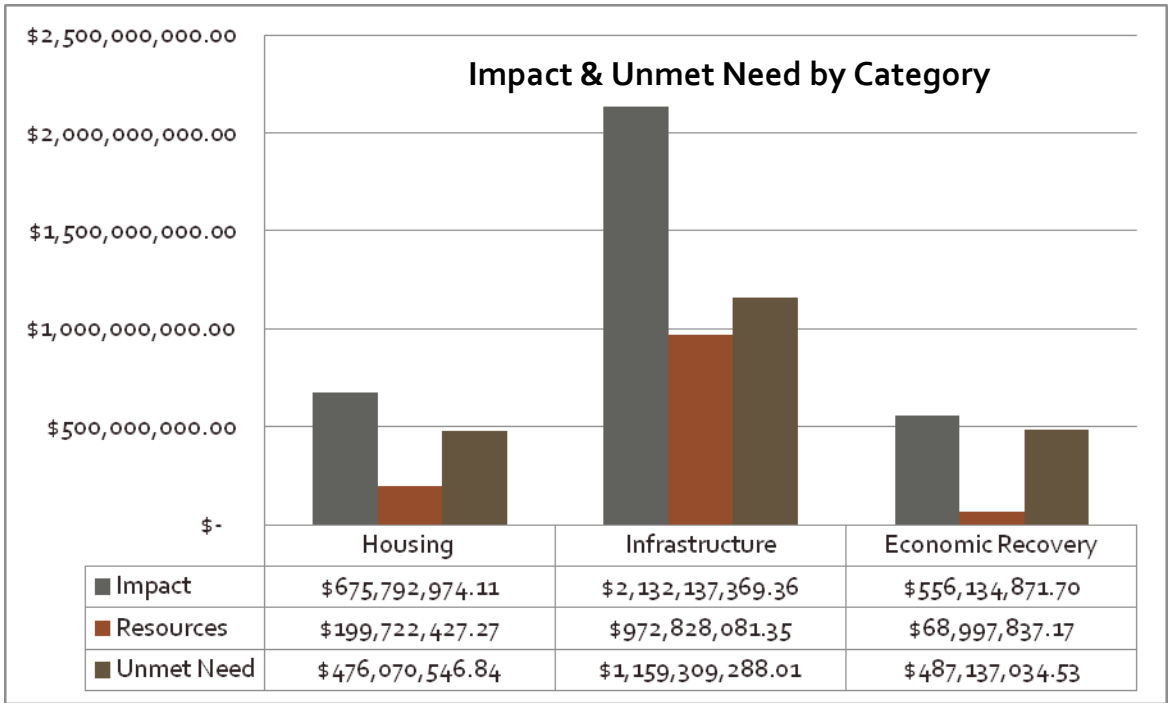
The total impact to the State, as outlined in Table 1 below, is approximately $3,364,065,215.17. Of this amount, approximately $1,241,548,345.79 in resources allocated to assist recovery have been identified, yielding an umet need of $2,122,516,869.38.

Table 1: Impact & Unmet Need Summary

Type	Impact	Resources	Unmet Need
Housing	$675,792,974.11	$199,722,427.27	$476,070,546.84
Infrastructure	$2,132,137,369.36	$972,828,081.35	$1,159,309,288.01
Economic Recovery	$556,134,871.70	$68,997,837.17	$487,137,034.53
Total	$3,364,065,215.17	$1,241,548,345.79	$2,122,516,869.38

The Infrastructure category yielded the largest amount of financial impact, with the most recovery resources allocated, and the largest amount of remaining unmet need with more than $1.1 billion in impact remainingto be addressed. This was followed by impact to the Housing sector at approximately $676 million and impact to the Economic sector, influenced heavily by steep declines in tourism after the flood, at $556 million. These categories will be discussed in detail in the following pages.

Table 2: Unmet Need by Major Category



DISASTER RECOVERY RESOURCES AS OF 1/27/14				
Type	**Housing**	**Infrastructure**	**Economic Recovery**	**Total Resources**
SBA	$ 73,688,542.83		$ 16,811,457.17	$ 90,500,000.00
FEMA IA	$ 59,500,331.44			$ 59,500,331.44
FEMA HMGP		$ 72,805,879.93		$ 72,805,879.93
Watershed Protection		$ 11,700,000.00		$ 11,700,000.00
NFIP	$ 49,300,000.00	$ 8,700,000.00		$ 58,000,000.00
Federal Hwy Admin		$ 450,000,000.00		$ 450,000,000.00
FEMA PA		$ 425,872,201.42		$ 425,872,201.42
Water Conservation Bodies			$ 44,705,000.00	$ 44,705,000.00
EFRP		$ 3,000,000.00		$ 3,000,000.00
Fundraising	$ 15,900,000.00			$ 15,900,000.00
CDLE			$ 5,712,314.00	$ 5,712,314.00
Revolving Water Funds			$ 1,023,642.00	$ 1,023,642.00
SERV		$ 750,000.00		$ 750,000.00
D - Unemployment Assistance			$ 710,424.00	$ 710,424.00
Private Well Fund			$ 25,000.00	$ 25,000.00
National Farm Aid			$ 10,000.00	$ 10,000.00
Low-Income Weatherization Program	$ 329,449.00			$ 329,449.00
Total Resources Received	**$ 198,718,323.27**	**$ 972,828,081.35**	**$ 68,997,837.17**	**$ 1,240,544,241.79**

Demographic Profile of the Impacted Area

Impact on Low-and-Moderate-Income Populations

Colorado's low-and moderate income (LMI) households received approximately 74% of destroyed units caused by the flood. A household is deemed LMI when the combined income is at or below 80 percent of the Area Median Family Income (AMFI) for the county.

AMI of Destroyed Units (Source: FEMA FIDA 22345 mod3 11.26.2013)						
County	30%and Below AMFI	31% - 50% AMFI	51% - 80% AMFI	Greater Than 80% AMFI	Unreported	Destroyed Count
Boulder	27.5%	19.6%	13.7%	29.4%	9.8%	77
El Paso	100.0%	0.0%	0.0%	0.0%	0.0%	1
Larimer	39.4%	15.2%	18.2%	18.2%	9.1%	19
Morgan	100.0%	0.0%	0.0%	0.0%	0.0%	1
Weld	39.1%	30.4%	15.9%	13.0%	1.4%	199
Total						**297**
State	**36.0%**	**23.0%**	**15.0%**	**19.0%**	**6.0%**	**100.0%**

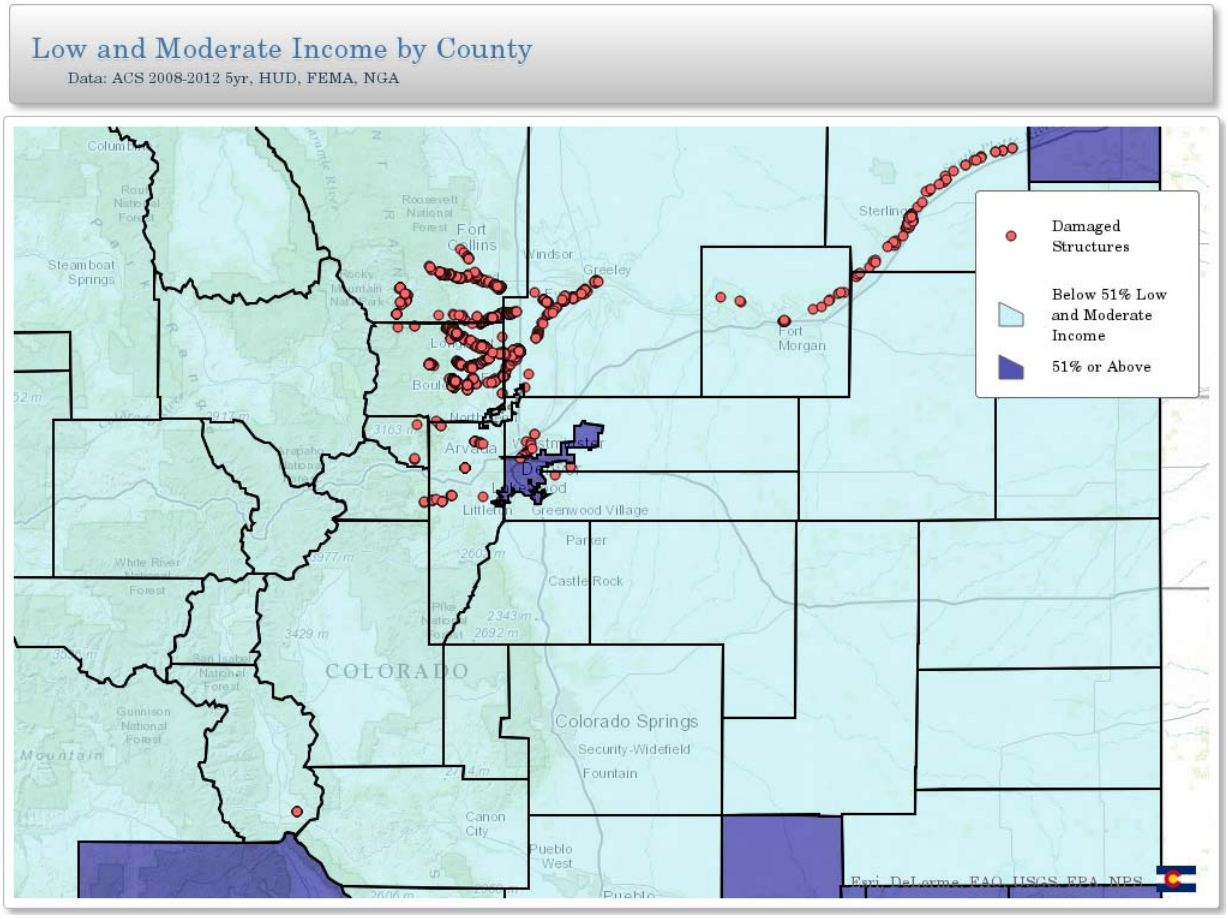
A majority of the funding will be used to assist the LMI population with the State committed to meeting and exceeding the federal requirement that at least 50% of the aggregate CDBG-DR grant award be used for activities that benefit low-and-moderate-income persons, as outlined in Federal Register 14329 on March 5, 2013. The LMI percentage for each impacted county is listed in Table 3. [1]

Table 3: Low/Mod Income

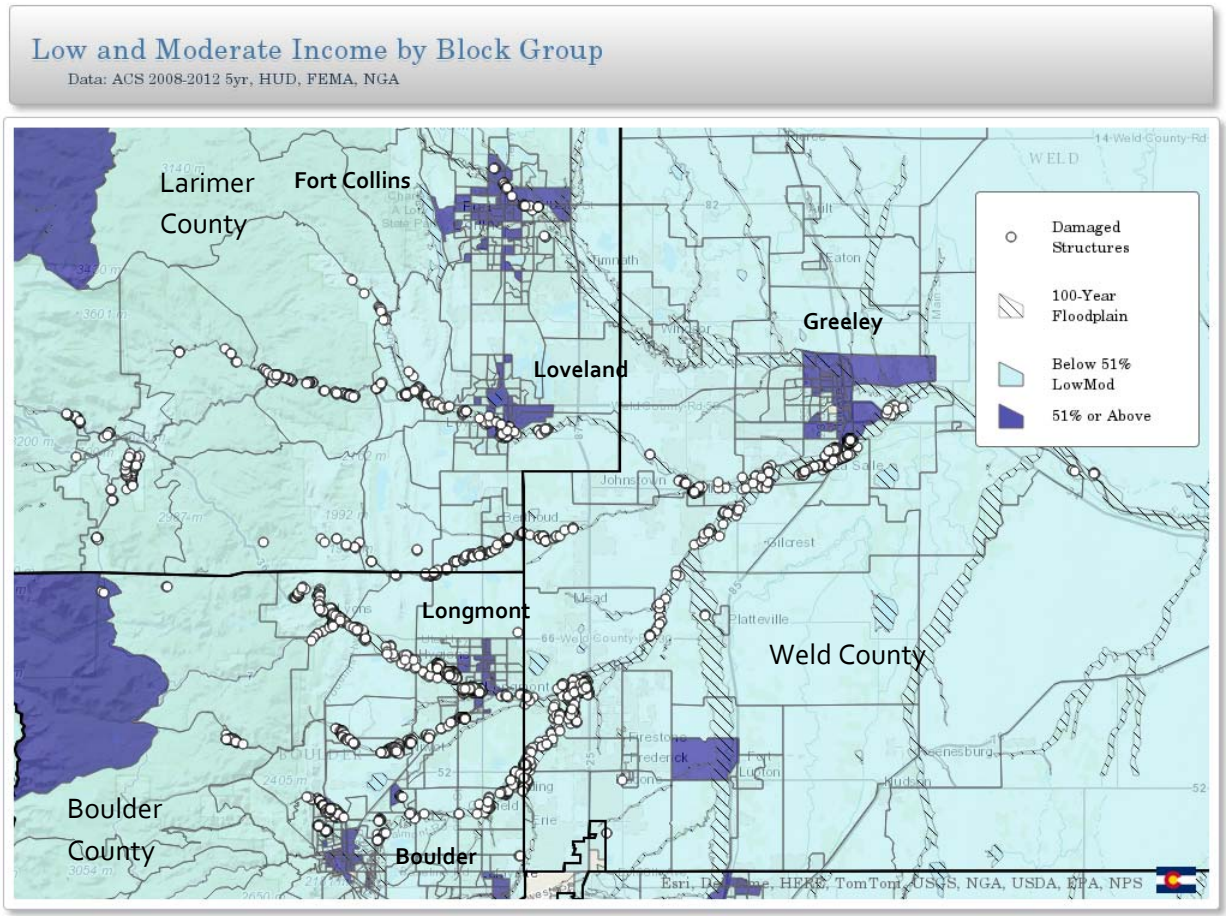
Low/Mod Income per County - ACS 2008-2012 5Y	
County	**Low/Mod Percentage**
Boulder	36.5%
Larimer	39.7%
Weld	41.0%
Adams	48.7%
Arapahoe	36.2%
Clear Creek	37.6%
Crowley	61.0%

[1] The Colorado Department of Local Affairs (DOLA) maintains a comprehensive GIS database with locations of flood damaged structures and businesses, as well as demographic information. Readers are encouraged to visit the DOLA website and explore the interactive mapping tools for real-time data. Data includes FEMA Final Assessment figures from 9/26/13. The mapping tool may be accessed at: http://dola.colorado.gov/cms-base/sites/dola.colorado.gov.gis-cms/files/projects/HousingDeptMap/HousingDept_v1.html

Denver	54.8%
El Paso	38.5%
Fremont	43.6%
Gilpin	34.0%
Jefferson	32.4%
Lake	41.9%
Lincoln	47.2%
Logan	45.7%
Morgan	48.3%
Sedgwick	52.6%
Washington	46.3%

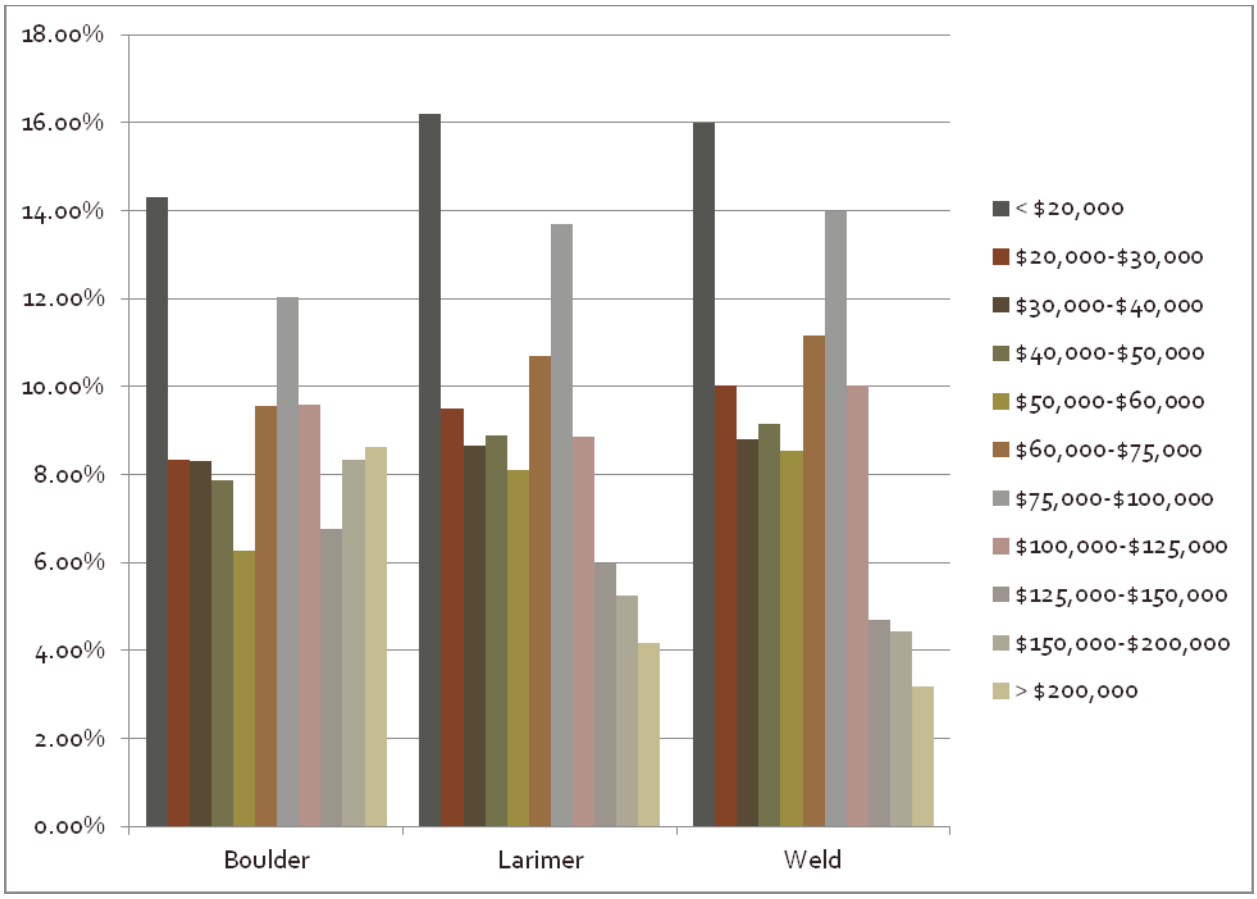


While the percentage of LMI households per county is below 51 percent for most counties, with the exception of Denver, each county has several census block groups that reflect a majority of LMI household population as depicted in the map above. These block groups are located in proximity of the communities of Longmont, Loveland, Fort Collins, and the southern edge of Greeley.



In addition to the county-level AMFI rates outlined above, the following tables provide perspective on the detail between the income categories within the three most-impacted counties.

Table 4: Income Categories by County



Using HUD 2014 Income limits, the income limits by AMI for the three most impacted counties are detailed below.

Table 5: AMI Limits

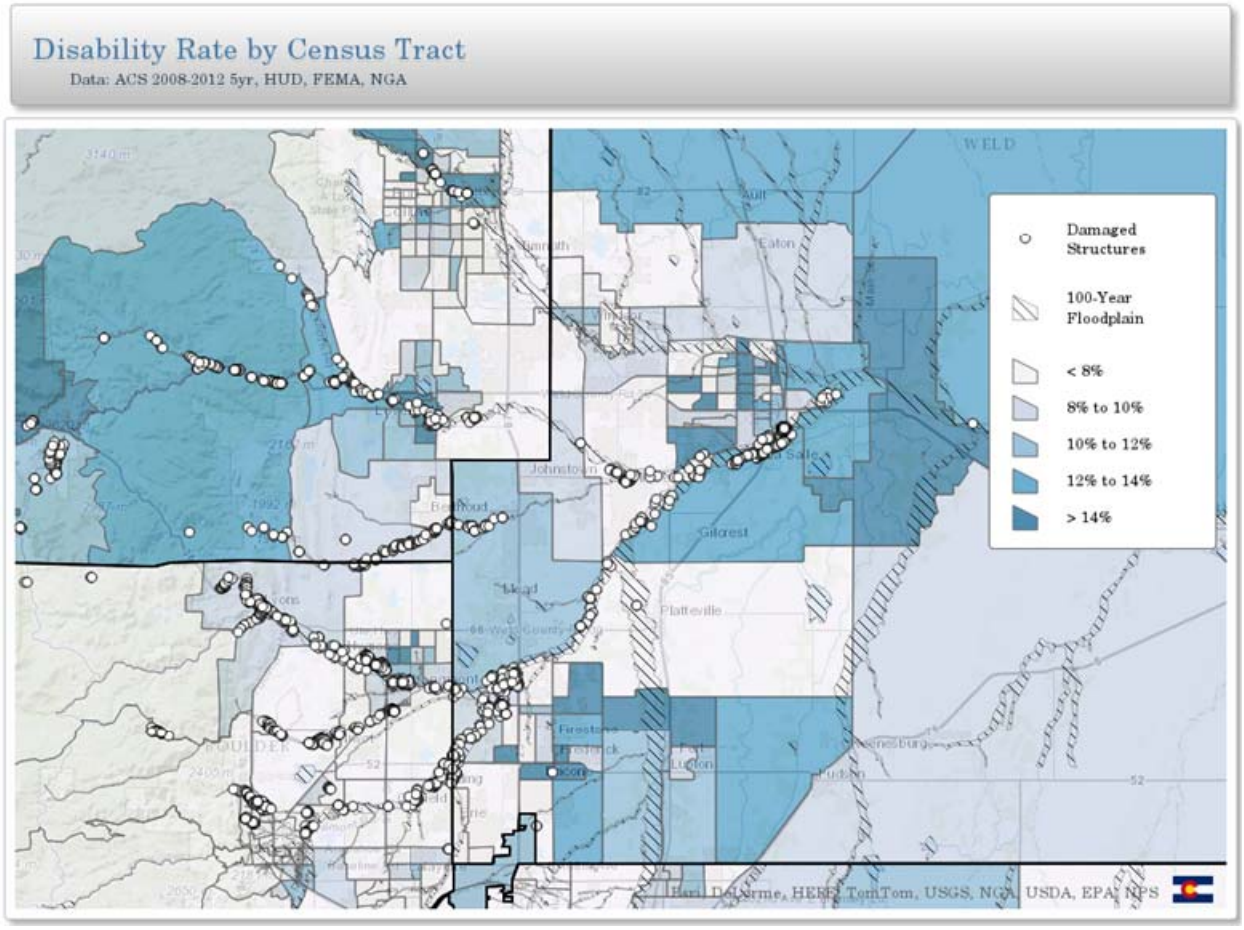
			4-PERSON INCOME LIMIT		
STATE	**COUNTY NAME**	**COUNTY**	VERY LOW <30% AMI	LOW <50% AMI	MOD<80% AMI
CO	Boulder County	013	$ 21,200	$ 35,350	$ 50,050
CO	Larimer County	069	$ 17,700	$ 29,500	$ 47,200
CO	Weld County	123	$ 14,900	$ 24,800	$ 39,700
http://www.hud.gov/offices/cpd/systems/census/lowmod/index.cfm					

Impact on Special Needs Populations

Households with special needs were affected by the flood and the State plans to include more priorities in their programs for households with persons with disabilities and/or special needs. Of the three most-impacted counties, Weld County has the highest percentage of special needs population, at 10 percent, followed by Larimer, then Boulder. Households with disabilities are often in the lowest economic brackets and are not able to rebound as quickly as other sectors of the community, often due to limited income and unique challenges.

Table 6: Special Needs Population

Special Needs Population - ACS 2008-2012 5Y	
Boulder	7.1%
Larimer	8.9%
Weld	10.0%



Housing Impact

The Housing impact of approximately $676 million is comprised of an estimated $670 million in damage to homes with a corresponding $5.9 million in damage to roads/ driveways and bridges on private property. Funds typically available to assist with housing recovery include FEMA, SBA, private insurance and non-profit assistance. **Of the $676 million impact, an estimated $199 million in resources have been made available, for a resulting Unmet Need of $476,070,546.84** as outlined in Table 7 below.

Table 7: Housing Unmet Need

Type	Impact	Resources	Unmet Need
Housing	$675,792,974.11	$199,722,427.27	$476,070,546.84

In the coming weeks the State will continue working with local partners to refine these estimates based on additional reported impact. Resources available through private insurance may take many months to finalize as homeowners file claims and negotiate awards with their carriers. In addition, although some affected residents have acquired rental housing or have purchased new or used homes, including mobile homes, many others may still be living with friends or relatives or have been displaced and may not yet have been accounted for in the unmet needs assessment.

Figure 1: Damage in Salina (Source: Boulder Co.)

Method: Homes

The impact of approximately $676 million for home value is based on inspections performed by FEMA Individual Assistance and SBA inspectors. HUD recognizes that FEMA Individual Assistance inspections, while they make up the majority of the damage information available, may not be as extensive as Small Business Administration inspections. FEMA Individual Assistance payments are limited to repair only flood damage to the pre-existing condition and paid out only upon the FEMA inspection. Many homes are still not inspected because access to the homes by road and/or bridge was washed away. Furthermore, FEMA's Individual Assistance does not consider resiliency to limit future damage from flooding or sustainability of properties. Likewise, while the Small Business Administration (SBA) inspections are likely to be more extensive, they address a relatively small proportion of the overall number of damaged units. In order to account for this potential gap in housing damage information, Colorado has chosen to employ a housing impact multiplier. The housing impact multiplier is a

consideration not only for the extensiveness of the FEMA Individual Assistance inspection process, but it also serves to account for those individuals who may not have applied for Federal disaster assistance or who were denied Federal disaster assistance. This is consistent with the *Calculating Unmet Needs* section of Federal Register Volume 78, No. 43.

The housing impact multiplier is based on the average value of the SBA award, which is calculated by dividing the total Small Business Administration assistance provided for the disaster by the number of awarded units. This average value is then divided by the average value of FEMA Individual Assistance recorded impacted units. This yields a housing impact multiplier. The multiplier is then applied to the total FEMA Verified Loss (FVL) as supplied by the FEMA Individual Assistance division. This yields a total housing impact.

To determine unmet need, Colorado subtracted the sum of the available housing funding resources from the total housing impact. The available housing funding resources value includes FEMA Individual Assistance award, Small Business Administration award, and National Flood Insurance Program award.

Table 8: Housing Multiplier

	Total $	Units	Average
FVL	$ 228,000,000.00	18,163	$ 12,552.99
SBA	$ 75,019,800.00	2034	$ 36,882.89
Multiplier	2.938175204		
Housing Impact	$ 669,903,946.61		

Method: Estimated Costs for Damaged Private Roads and Bridges

The cost estimates for private road and bridge repairs include the following assumptions:

- Decking replacement average cost: $75,000 per replacement
- Full bridge replacement: $100,000 per replacement
- Fill, rip-rap and filter fabric for bridge and deck replacements: $36,180.34 per case
- Machine time/road fill: $2,000 per case
- Culvert replacements 36-inch: $6,780 per case
- Culvert Replacement $30-inch: $5,966.40 per case
- Rip rap and filter fabric for culverts: $2,289.50 per case
- Abutment replacements: $5,000 per case
- Roads and bridges evaluated by FEMA: $301,000
- Resiliency/mitigation costs: 306,660

Methodology explained:

Individual line item costs were derived using standard Colorado Department of Transportation (CDOT) costs, R.S. Means data, and local construction bid information. 454 total Individual Assistance entries

were evaluated for type of damage identified. They were placed into the categories listed above and then a cost estimate (outlined below) was developed for each type of damage:

- Decking replace: $75,000 *10 cases = **$750,000** (assuming the bridge is 60 Ft long by 15 ft wide)
- Full bridge replace: $100,000*15 cases = **$1,500,000** (based on average of bridge replacement cost estimates using CDOT average costs per sq. ft (60 ft long by 15 ft wide)
- Rip-rap, structural fill and filter fabric for full bridge and deck replacements (2,000 CY of structural fill *14.15/cy)+ (40cy rip rap *72.40/cy) + (350sy of fabric fill*$2.35/sy)+(30 hours*110/hr))+10% mobilization +3% traffic = Estimated 25 cases = **$904,508.50**
- Machine time/road fill (8 hours*110/hr for equipment)+(100cy*$7.63/cy)+ 10% mob and 3% traffic = approx. $2,000*292 cases = **$584,000**
- Culvert Replacement 30-inch ($90/lineal ft * 40 ft) + 100 cy dirt ($800) + 110/hr*8hr equipment) + 10% mobilization + 3% traffic estimated – Total $5,966.40*60 total cases= **$357,984**
- Culvert Replacements – 36 inch (assuming 40 ft long* and 20% cost increase for culvert) = approximately $4320 + 100 cy dirt ($800) + (110/hr*8 for equipment) + 10% for mobilization +3% traffic = $6,780*58 cases = **$393,240**
- Rip rap, and filter fabric for culverts – (30sy rip rap*72.40) + (50sy fabric*2.35) = **$270,161**
- Estimated Abutment cost $5,000 per *12 cases = **$60,000 –**
- Other FEMA estimated project costs from Private Road and Bridge reports (roads and bridges with 4 or more residences behind): **$301,000**

Total Private Roads and Bridges: $5,120,893.50
Additional Resiliency Cost (15%) = $768,134
Total Impact to Private Roads: $5,889,027.50

Housing Types Affected

Many types of housing were affected by the floods, ranging from single family stick-built homes to mobile homes, public housing, and rental units. The recovery program is designed to address a portion of each of these housing types in order to serve the spectrum of the population impacted and provide for true housing choice.

The unmet housing need for the 11 counties approved for FEMA IA assistance is detailed in the table below. Boulder, Larimer, and Weld counties have the highest amount of unmet need, making up 96% of the total unmet need.

Table 9: FVL by County

Unmet Housing Need by County- Source Data FEMA IA			
County	**Total FVL**	**Assistance Total**	**Unmet Need**
Adams	$2,765,412.76	$2,449,124.43	$316,288.33
Arapahoe	$6,654,873.01	$6,334,465.91	$320,407.10
Boulder	$121,634,751.54	$87,973,391.60	$33,661,359.94
Clear Creek	$704,226.20	$520,364.43	$183,861.77
El Paso	$3,976,906.26	$3,418,572.89	$558,333.37
Fremont	$149,105.17	$122,108.06	$26,997.11
Jefferson	$5,024,235.04	$3,793,623.95	$1,230,611.09
Larimer	$41,883,694.50	$24,955,490.74	$16,928,203.76
Logan	$1,671,753.51	$1,293,959.56	$377,793.95
Morgan	$169,207.96	$155,790.53	$13,417.43
Weld	$43,405,459.55	$29,705,008.35	$13,700,451.20
Total	**$228,039,625.50**	**$160,721,900.45**	**$67,317,725.05**

Both homeowners and renters received damage from the flooding or their units were completely destroyed. Boulder County makes up more than half of the units either damaged or destroyed. El Paso, Arapahoe, Weld, and Larimer counties contain approximately one third of damaged or destroyed rental units.

Table 10: Owner vs. Renter Damage

Unit Breakout by County – Source Data FEMA IA					
County	**Damaged**		**Destroyed**		**Total**
	Owners	Renters	Owners	Renters	
Adams	645	99	0	0	744
Arapahoe	1,813	293	0	0	2,106
Boulder	8,429	1,999	49	28	10,505
Clear Creek	107	4	0	0	111
El Paso	667	315	0	1	983
Fremont	45	2	0	0	47
Jefferson	571	37	0	0	608
Larimer	1,298	217	13	6	1,534
Logan	90	19	0	0	109
Morgan	14	7	1	0	22
Weld	929	266	140	59	1,394
Total	**14,608**	**3,258**	**203**	**94**	**18,163**

Impact on Homeowners

Homeowners throughout the State of Colorado were significantly affected by the flooding. Owner occupied units make up approximately 66 percent of housing stock in Boulder, Larimer, and Weld counties.

Table 11: Owner Occupied Properties--Units

Owner Occupied Properties - Units		
	ACS 2008-2012 5Y	
	Owner Occupied	Total Housing
Boulder	75,992	120,061
Larimer	79,839	120,592
Weld	63,105	89,553
Total	218,936	330,206

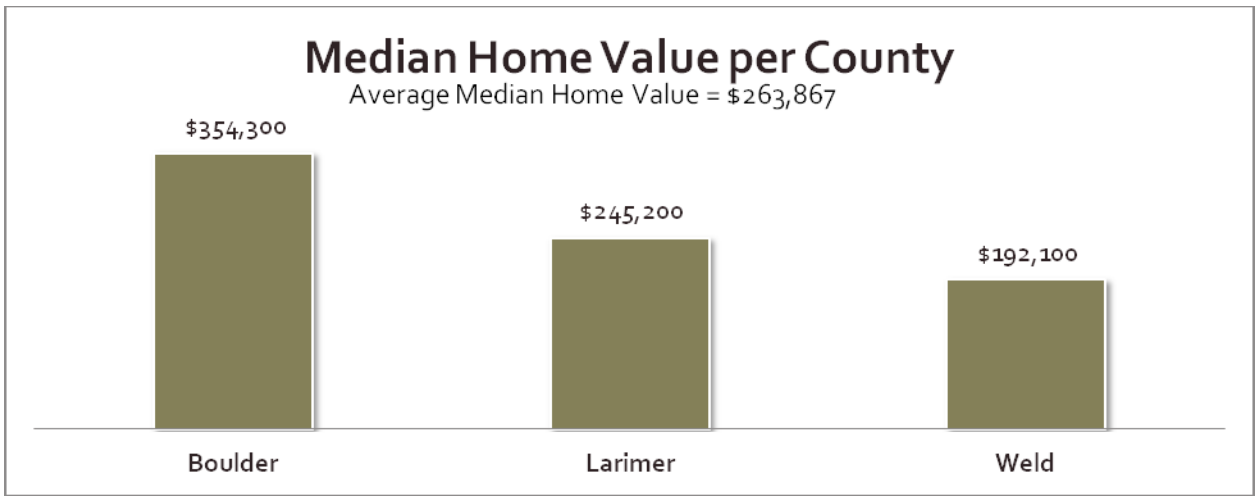
Table 12: Owner Occupied Properties--Percentage

Owner Occupied Properties - Percentage	
ACS 2008-2012 5Y	
Boulder	63%
Larimer	66%
Weld	70%
Average	66%

The majority of the residents who sustained damage from the flooding were homeowners. Approximately 10,850 of homeowner's property sustained some amount of physical damage according to the FEMA Full Verified Loss data.

Owner Damage - FEMA FVL Data as of 11/26/13 - Boulder, Larimer, and Weld Counties				
	Number Impacted	Real Property FVL	Personal Property FVL	Total FVL
Owner	10,858	$ 181,168,335.65	$ 16,881,504.94	$ 198,049,840.59

Median home values are significantly higher in Boulder than in Larimer and Weld, however, as illustrated by the figure below. Whereas a home may cost upwards of $350,000 in Boulder County, comparable home costs are approximately $192,000 in Weld County.



The FEMA Individual Assistance data describes housing damage by severity as outlined in HUD's Federal Register Notice (FR-5696-N-07). Within the most impacted counties approximately 10,900 homes were either directly or indirectly affected by the flooding or received minor damage. The data also show that approximately 1,233 homes sustained "major" physical damage or were destroyed in the flooding as depicted in Table 13.

Table 13: Damage Categories by FEMA Full Verified Loss (FVL) Designations

Damage Categories by FEMA Full Verified Loss (FVL) Designations – FEMA Individual Assistance Data			
	Boulder	**Larimer**	**Weld**
Affected	7,297	1,095	690
Minor	2,524	325	269
Major	607	95	236
Destroyed	77	19	199
Total	**10,505**	**1,534**	**1,394**

Impact on Rental Stock

Based on current data, rental properties make up approximately 34 percent of housing units in Boulder, Larimer, and Weld counties. The rental properties in all three counties are close in comparison of the percentage of housing stock. Boulder has the highest percentage of rental properties at 37 percent.

Table 14: Rental Properties

Rental Properties - Units			
ACS 2008-2012 5Y			
	Percentage	**Rental Units**	**Total Housing Units**
Boulder	37%	44,069	120,061
Larimer	34%	40,753	120,592
Weld	30%	26,448	89,553
Total	34%	111,270	330,206

Using data from the ACD 2008-2012 5Y information, Table 13 depicts the median gross rent and rental vacancy rate for each of the impacted counties. Boulder and Gilpin counties have the highest rental rates at a monthly average of $1,070. Washington, Crowley, and Sedgwick counties have the lowest rental rates at an average of $545 per month. The average for all 18 counties' median gross rent is approximately $800 per month.

The rental vacancy rates for Lincoln, Crowley, Lake, and Sedgwick counties average 15 percent. This is much higher when compared to the vacancy rates for Fremont, Morgan, and Boulder at a 2.5 percent average. The average for all 18 counties' rental vacancy rates is approximately 8 percent. A 5% vacancy rate is considered healthy for a community in Colorado.

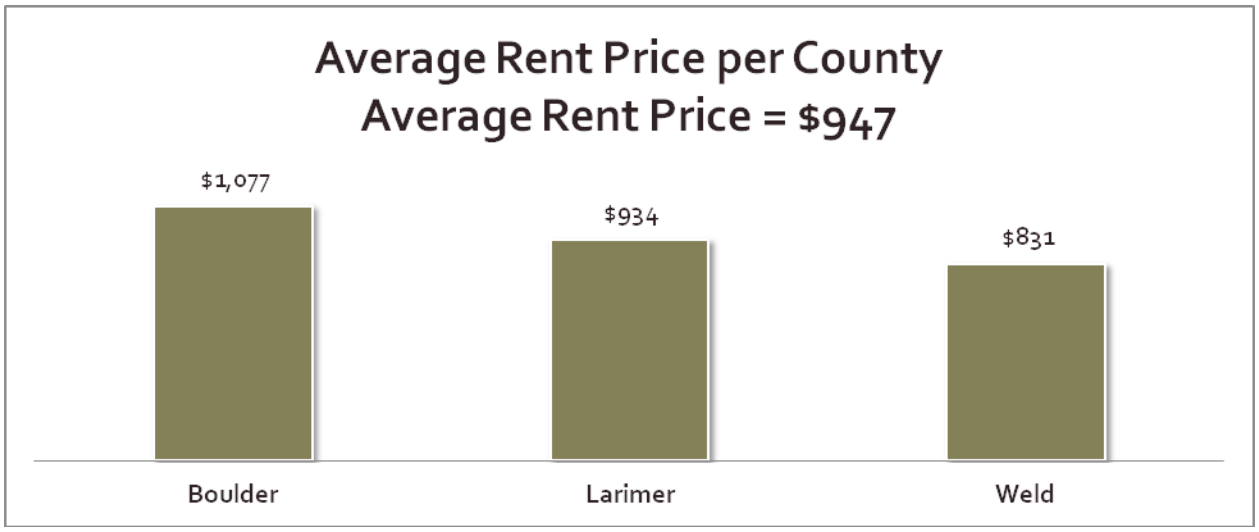
Table 15: Rent Rates

Rent Rates per County		
County	**Median Gross Rent ACS 2008-2012 5Y**	**Rental Vacancy Rate ACS 2008-2012 5Y**
Boulder	$ 1,077.00	2.90%
Larimer	$ 934.00	4.20%
Weld	$ 831.00	6.80%
Adams	$ 947.00	7.20%
Arapahoe	$ 950.00	6.60%
Clear Creek	$ 849.00	9.40%
Crowley	$ 557.00	13.90%
Denver	$ 863.00	5.80%
El Paso	$ 884.00	6.50%
Fremont	$ 711.00	2.30%
Gilpin	$ 1,059.00	5.40%
Jefferson	$ 958.00	4.70%
Lake	$ 804.00	14.20%
Lincoln	$ 640.00	12.50%
Logan	$ 615.00	7.80%
Morgan	$ 675.00	2.50%
Sedgwick	$ 557.00	18.90%
Washington	$ 528.00	6.90%

Approximately 2,500 of rental properties sustained some amount of physical damage according to the FEMA Full Verified Loss data.

Renter Damage - FEMA FVL Data as of 11/26/13 - Boulder, Larimer, and Weld Counties				
	Number Impacted	Real Property FVL	Personal Property FVL	Total FVL
Rental	2,575	$ 400,837.51	$ 8,473,227.49	$ 8,874,065.00

Mirroring the single family home prices, rents in the more urban Boulder County average $1,077, followed by Larimer, then Weld at $831. However, Larimer and Weld counties also have higher proportions of the population with incomes in the low to moderate income ranges, in particular the segments earning less than $30,000.

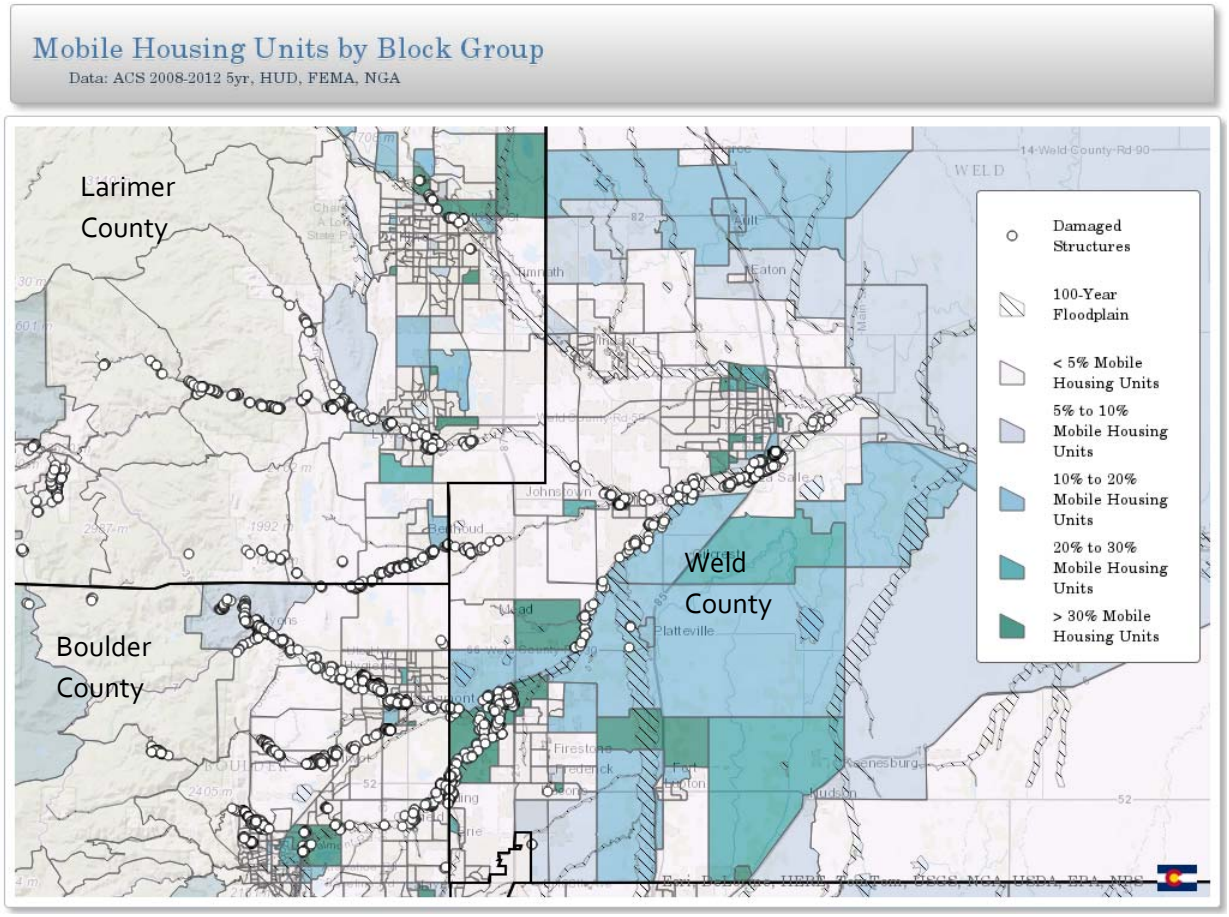


Vacancy rates have gone down in Larimer and Weld Counties while rent prices have gone up. This contraction in the housing market post-flood identifies a recovery need that will be addressed by constructing more, affordable units.

Apartment Market Data - Source: Apartment Insights Data				
Vacancy Rates	2012: Q4	2013: Q4	Change	% Change
Boulder MSA	3.86	4.78	0.92	23.83%
Larimer County	3.81	2.73	-1.08	-28.35%
Weld County	3.86	1.79	-2.07	-53.63%
Average Rent Prices	2012: Q4	2013: Q4	Change	% Change
Boulder MSA	$ 1,113	$ 1,250	$ 137	12.31%
Larimer County	$ 1,022	$ 1,064	$ 42	4.11%
Weld County	$ 715	$ 764	$ 49	6.85%

Impact on Mobile Housing Units

The mobile housing population was significantly impacted by the flooding. The State includes mobile housing unit replacement in their program to assist those that have been displaced. The map depicts the population of mobile housing units in relation to flood zones and damaged structures. Concentrations of mobile units that coincide with a high number of damaged structures are located in Evans, Milliken, Lyons and Longmont.



In Lyons, the Riverbend Mobile Home Park (30 mobile homes) and the Foothills Mobile Home Park (12 mobile homes) were both destroyed with all mobile homes needing to being removed. Lyons Valley Village, a co-housing facility of 18 households (11 buildings), also sustained significant damage. The Bella Vista and Eastwood Village parks in Evans had to be permanently evacuated.

Table 16: Mobile Homes

MOBILE HOMES WITH FULL VERIFIED LOSS (FVL) OR DESTROYED		
County	**Destroyed**	**FVL**
Adams		38
Arapahoe		2
Boulder	51	393
Clear Creek		3
El Paso	1	9
Fremont		10
Jefferson		17
Larimer	32	50
Logan		26
Morgan	1	6
Weld	69	347
TOTALS:	**154**	**901**
Source: FEMA DR 4145 11/25/13		

"The hardest hit neighborhoods in Evans are not only among those with the greatest intensity of flooding in Colorado but also show signs of being the most vulnerable to efficient recovery. The most impacted neighborhoods in Evans have very low per capita and median family incomes. These neighborhoods also exhibit high rates of poverty, especially in elderly-headed households and families with kids. There is also a greater share of people that don't speak English well than the state average."

-Community Foundation/ United Way

Transitional Housing/Homelessness

The State will promote the availability of affordable housing in areas of opportunity where appropriate, and will support plans that are equitable to persons with disabilities, minority groups and low-income people. The rental programs in this plan will bring affordable units on line for low income persons. The State is also concerned about availability of shelters and transitional housing needed for the victims of

domestic violence. Some domestic violence shelter clients were directly impacted, mainly through loss of income because their places of employment shut down during the deluge, and the emergency shelter provided housing for some families displaced by flood damage. The vast majority of domestic violence victims report extremely low incomes, commonly less than $10,000 annually.

Long-term, the greatest impact of the 2013 flooding on victims of domestic violence is to further limit the affordable housing options available in the community. Rental vacancy rates at every price point are at historic lows and average monthly rents have risen as a result. Access to affordable housing is a key component to a survivor of domestic violence achieving and sustaining stability and self-sufficiency. In the wake of the September floods, this is more challenging than ever for domestic violence survivors in flood-impacted areas of Colorado.

We will take the homeless population into consideration as part of the long-term recovery strategy. Using data from the 2013 Point-in-Time Count, the homeless population in the three most impacted counties totals approximately 3,000 persons. Experienced sub-recipients and affordable housing providers in the region with existing networks and knowledge of the needs of homeless will operate the housing programs.

Table 17: Homeless Population

Homeless Population - Using 2013 Point-In-Time Data	
County	**Homeless Population**
Boulder	2,366
Larimer	324
Weld	331

Public Housing

The damage to federally funded housing was spread across the impacted communities; however the overall damage was not at the scale of other types of housing impacted by the floods. This was a result of Colorado's prudent planning efforts in years past, in which environmental risk was considered when choosing sites to locate public and supportive facilities. Because of this, public housing and homeless shelters received minimum damage as they were built in low-risk areas.

Boulder County has two developments that received damage, including Section 8 housing and a senior assistance living development. Bloomfield Place is an 8-unit senior assistance living development. It received direct damage from the flooding and all residents were evacuated. The residents were displaced for a temporary period, but returned to their units. Alvarado Village sustained moderate damage and no residents were displaced. Adams County had one development that received moderate damage. Tenants were temporarily displaced but are currently back in their units.

The state manages approximately 7,000 housing choice vouchers. Partner agencies in the flood-affected counties made deliberate attempts to contact any voucher holders that were displaced due to the flooding. Of the 36 displaced voucher holders identified, five participants were permanently

displaced. These participants' units were destroyed and they have relocated. The remaining 31 voucher holders were temporarily displaced. Repairs have been made and the participants were able to move return to their units.

DOLA reached out to housing agencies through phone calls and damage surveys in order to determine the impact to public housing. Additionally, DOLA attained a list of impacted properties from HUD. DOLA called each property that was impacted to assess any remaining damage. Property repairs had been completed and all residents of the publicly assisted housing had returned to their housing. If this is contrary to what HUD understands, the State will prioritize improvements to HUD-assisted properties. The most heavily impacted communities have the tightest housing markets in the state. The tight market condition continue to challenge Housing Choice Voucher holders and many of them remain in temporary housing waiting for permanent solutions.

Anti-displacement

Immediately following the floods, Colorado acted swiftly to help those displaced and unable to return home by opening a number of emergency shelters throughout the affected areas. Approximately 500 people were sheltered during the onset of the floods. Residents in the three most affected counties were able to find shelter in one of the many emergency shelters that were opened in various schools and recreational centers. Around ten households within Boulder County were housed at a local church camp. In the town of Erie, close to 50 residents were housed at a Red Cross shelter for multiple days, and in Milliken in Weld County, more than 154 residents were moved into the Middle School. Due to the State's quick response and strong partnerships with local organizations, Coloradans had a safe and warm shelter during the chaotic aftermath of the floods. Colorado will continue to keep its effective and efficient plans in place should another disaster occur.

The State plans to minimize displacement of persons or entities and assist persons or entities displaced through CDBG-DR funded projects. This is not intended to limit the ability of the State to conduct buyouts or acquisitions for destroyed and extensively damaged units or units in a floodplain. The State plans to exercise the waivers set forth in FR 5696-N-01 pertaining to URA and HCD Acts given its priority to engage in voluntary acquisition and optional relocation activities to avert repeated flood damage and to improve floodplain management. Efforts to conduct voluntary buyouts for destroyed and extensively damaged buildings in a floodplain may not be subject to all provisions of the URA requirements.

For low-income residents displaced by the floods, a temporary housing program will be available through CDBG-DR to allow time for new units to be rehabilitated or constructed.

Fair Housing

The State will ensure that Fair Housing is appropriately addressed in disaster recovery. Stakeholder meetings are scheduled for Boulder, Larimer, and Weld counties to address fair housing impediments. The State worked with its Civil Rights Division and other local community groups and reviewed its Analysis of Impediments to Fair Housing in the creation of this Action Plan.

The Analysis of Impediments states:

> *"Survey responses, entitlement-area Analyses of Impediments, and Colorado Division of Housing Rental Housing Mismatch report and American Community Survey data most frequently name the shortage of affordable units for households with low and very low incomes. The lack of affordable housing has a disparate impact on Black/African Americans, Hispanics, American Indians, women and people with disabilities because higher percentages of these protected classes are low income.*
>
> *However, high housing cost is not, in and of itself, an impediment to fair housing. It is the actions that communities take to limit the types and locations of affordable housing that can represent impediments to fair housing when they cause or exacerbate existing segregation, whether or not that is the community's intent."*

In order to address this possible impediment, representatives from the Colorado Civil Rights Division joined the State representations and spoke at the stakeholder meetings in each county to discuss priorities that will be given to special populations, such as seniors and persons with disabilities. The State will also work to ensure that disaster recovery funding is used to affirmatively further fair housing by funding areas with concentrations of minorities, in particular in its efforts to replace mobile homes. Generally the mobile home and manufactured unit communities consist of concentrations of protected classes.

Of the three most impacted counties, Weld County has the highest concentration of protected classes. The largest minority population identified in the affected area is of limited-English speaking residents, many of whom are Latino. According to the American Community Survey, concentrations of limited-English speaking populations exist in parts of Evans, Island Grove Park, Fort Lupton, Longmont and north of Fort Collins. The State met with the Mexican consulate in Weld County on Thursday, December 5, 2013. The Mexican Consulate held two public meetings in Weld County to discuss assistance to Spanish speaking citizens and documented individuals. The meetings were also a forum for undocumented households seeking assistance from non-public sources. These meetings were at the invitation of the Mexican Consulate and included federal, state, and local agencies involved in the disaster recovery effort. The Division of Housing works with the Colorado Division of Civil Rights and the Civil Rights Commission to conduct outreach to these Spanish speaking households to ensure equity in the access to assistance. The major concern raised at both meetings was a perceived disconnect to services experienced by Spanish-speaking flood victims. The use of Spanish-speaking staff to assist in service delivery and to act as a focal point to address this issue will be a priority in providing assistance with CDBG-DR funding. Additionally, the Colorado Immigrant Rights Coalition (CIRC) works with local congregations in Weld County to address the needs of undocumented residents in the county. The State also provided Spanish-speaking interpreters at each community meeting addressing the State's Action Plan.

The state identified the following potential fair housing issues to be addressed:

- Ensuring that local governments understand the need to replace affordable housing
- High number of non-English speaking residents
- Unknown number of undocumented residents with housing needs

Local governments will receive more training and guidance on how fair housing should be applied in the disaster recovery programs. The State will also have all documentation related to the programs, including the action plan, translated into Spanish. Translators will also be available at the upcoming stakeholder meetings and public hearings.

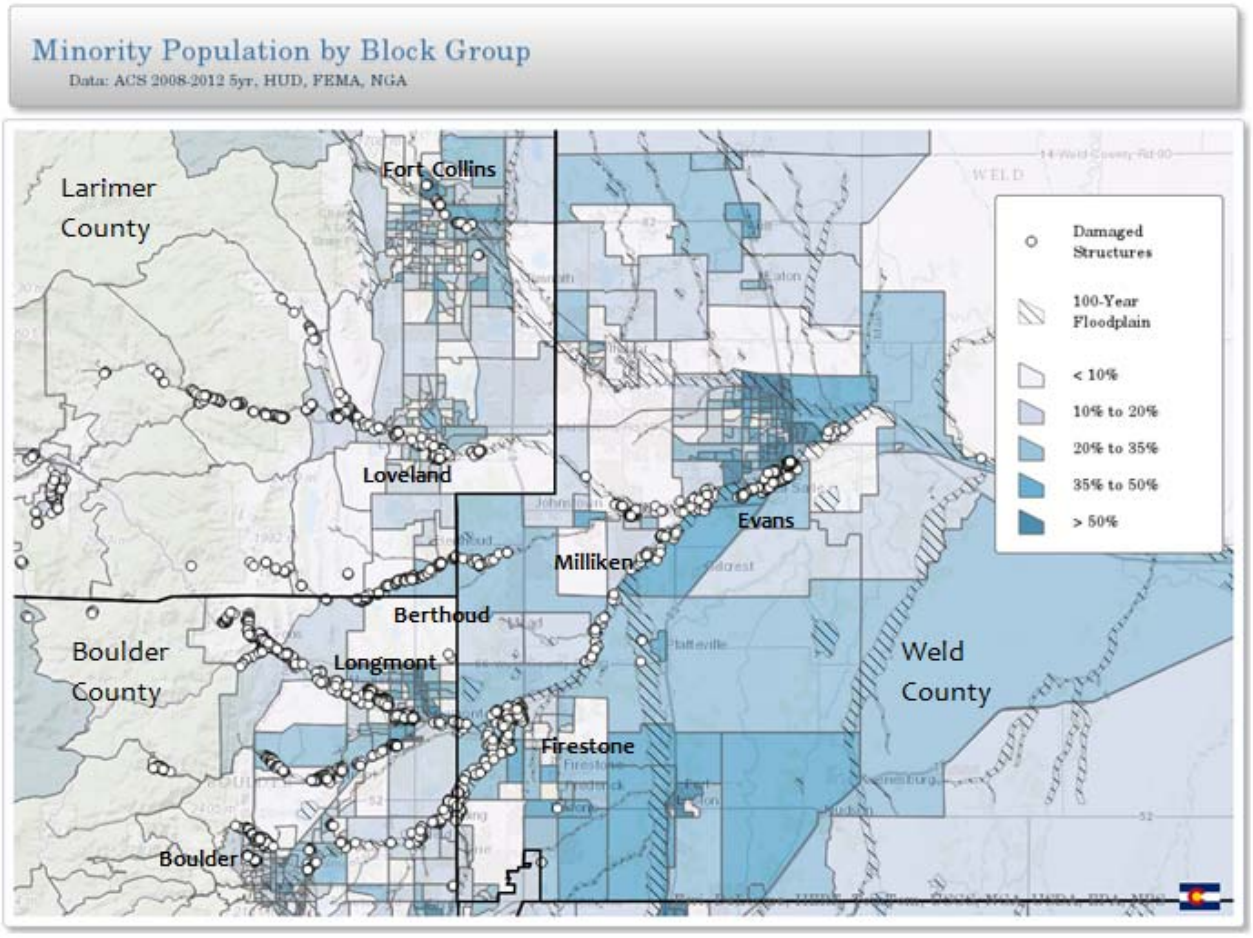
Within Weld County, Evans and Milliken suffered damage overlapping with a higher minority concentration when compared to other places in the county. Arapahoe and Adams counties also have a high concentration of damage and minority overlap.

These and other similar areas will be a part of the bilingual outreach to inform the public of available programs for disaster recovery.

The State will work to ensure that disaster recovery funding is used to affirmatively further fair housing by funding areas with concentrations of minorities, in particular in its efforts to replace mobile homes.

Table 18: Summary Demographic Data

	Households	Median HH Income		% Housing Over 65	% Black	%Asian & Haw/PacIs	%Native American	% White (non-Hispanic)	% Hispanic	% Owner	% Renter
Boulder	120,061	$	67,403	10.1%	0.8%	4.0%	0.3%	79.3%	13.3%	63.3%	36.7%
Larimer	120,592	$	57,927	12.0%	0.8%	1.9%	0.3%	84.3%	10.6%	66.2%	33.8%
Weld	89,553	$	56,589	9.7%	0.8%	1.3%	0.4%	67.6%	28.3%	70.5%	29.5%
Adams	151,034	$	56,633	8.5%	2.9%	3.5%	0.5%	53.3%	37.8%	66.3%	33.7%
Arapahoe	223,747	$	60,400	10.3%	9.7%	5.1%	0.4%	63.5%	18.3%	64.0%	36.0%
Clear Creek	4,013	$	60,517	12.6%	0.3%	0.5%	0.1%	91.9%	5.0%	79.7%	20.3%
Crowley	1,207	$	38,507	10.9%	7.7%	1.0%	1.4%	59.8%	29.1%	77.9%	22.1%
Denver	261,836	$	49,091	10.4%	9.8%	3.4%	0.6%	52.2%	31.8%	50.4%	49.6%
El Paso	234,058	$	57,531	10.1%	5.7%	2.8%	0.5%	72.0%	15.1%	64.5%	35.5%
Fremont	17,200	$	40,893	17.7%	5.8%	1.1%	1.7%	77.2%	12.4%	71.9%	28.1%
Gilpin	2,458	$	62,286	10.5%	0.8%	0.4%	0.3%	90.4%	6.0%	75.5%	24.5%
Jefferson	219,005	$	68,748	12.7%	1.0%	2.5%	0.5%	79.8%	14.4%	70.7%	29.3%
Lake	2,879	$	45,082	4.6%	1.0%	0.8%	2.4%	60.1%	34.2%	70.3%	29.7%
Lincoln	1,874	$	43,807	16.8%	9.2%	0.5%	2.1%	74.4%	12.5%	69.3%	30.7%
Logan	8,020	$	41,369	14.4%	1.4%	0.6%	0.3%	81.0%	15.7%	71.3%	28.7%
Morgan	10,489	$	42,829	14.2%	2.5%	0.2%	0.5%	61.7%	33.9%	64.1%	35.9%
Sedgwick	981	$	38,401	22.9%	0.3%	0.7%	0.0%	79.2%	18.7%	72.9%	27.1%
Washington	2,073	$	43,925	19.5%	0.4%	0.2%	0.8%	88.9%	9.0%	71.6%	28.4%


Minority Population by Block Group
Data: ACS 2008-2012 5yr, HUD, FEMA, NGA
Larimer County
Fort Collins
Loveland
Berthoud
Longmont
Boulder County
Boulder
Milliken
Evans
Firestone
Weld County
Damaged Structures
100-Year Floodplain
< 10%
10% to 20%
20% to 35%
35% to 50%
> 50%

Infrastructure Impact

More than 485 miles of road were damaged and/or destroyed and shoulders were washed away from road side ditch flowing water. Concrete curbs, gutters, sidewalks and asphalt were also damaged, making access to homes or communities dangerous or impossible. Damage will continue to emerge as roads that were submerged underwater buckle or crack in the coming months.

Figure 1: Damage to Hayden Court, Longmont (Source: Survey)

Water and wastewater systems, public facilities such as schools and hospitals, and parks and natural resources were damaged or destroyed. In Lyons, all utilities were down and both schools were closed for eleven weeks.

The State's unique land ownership law and complex system of water law poses complexities to the overall infrastructure recovery. Many critical roads and waterways are owned by public and private land owners. For example, in addition to the miles of public roads that were destroyed, there are some local roads that are either privately owned, or publicly dedicated and privately maintained. These roads provide critical emergency access to families and homeowners. FEMA public assistance may not be available to fund these roads due to their lack of public maintenance. Similarly, the damage to critical waterways includes a combination of public and private properties. Larimer County explains, "We estimate that the cost of high priority bank protection and channel bank restoration could be in the range of $10 million to $20 million. These stream channels traverse a patchwork of public and private properties creating additional complexities to clean-up and restoration" (Colorado United, Larimer County Community Survey, Fall 2013). Many of the underlying streambeds are owned privately while the water running through the stream is owned publicly. To further complicate the issue, property lines are often drawn in the middle of the stream and include multiple owners. While privately held land is impacted in every disaster, the overlap between private and public benefit is unique to Colorado with its complex system of land and water rights and its mountain communities.

In addition, a number of sites in Larimer, Boulder, Weld, Morgan, Jefferson and El Paso Counties are dealing with significant debris issues, totaling over $65 million according to the Colorado Department of Natural Resources, not including assessments included in project worksheets. Some of this debris is located on private property and may be ineligible for FEMA public assistance; however failure to remove the debris may result in massive flooding implications in the near and long-term as snowmelt runs downriver and encounters course-changing obstacles and blockage.

Many of the communities in the impacted area are in fiscal crises due to compounding infrastructure and federal match costs, emergency response expenses, and faltering tax and employment bases.

Infrastructure expenses can exceed local budget capacity by hundreds of thousands of dollars. Funds typically available to assist with infrastructure recovery include FEMA, private insurance and non-profit assistance. **Of the $2.1billion impact, an estimated $972.8 million in resources have been made available, for a resulting Unmet Need of $1,159,309,288.01** as outlined in Table19below.

Table 19: Infrastructure Unmet Need

Type	Impact	Resources	Unmet Need
Infrastructure	$2,132,137,369.36	$972,828,081.35	$1,159,309,288.01

The $2.1 billion in impact was calculated based on FEMA Public Assistance Project application information, data from the Colorado Department of Transportation (CDOT) regarding state roads, impact to ditches and streams, utilities, railroads, schools, and neighborhood infrastructure. Factors associated with needed improvements related to mitigation and resiliency account for an additional $527 million. The impact costs are broken out in Table 20 below:

Table 20: Infrastructure Impact

Infrastructure Impact	Cost
Project Worksheets from local communities: 1,040 project worksheets estimated at $567,829,601.89 M (includes both Federal and State/Local shares) PLUS additional 25% ineligible projects estimated at $141.9M	$709,787,002.36
Colorado Department of Transportation (CDOT): state roads	$535,000,000.00
Ditches, dams & stream gauges cost as reported by Colorado Department of Natural Resources (DNR)	$65,200,000.00
Utilities: Including Xcel Energy damages of $18M and Verizon damages of $105K	$18,100,000.00
School District damages	$957,455.00
Railroads	$3,470,000.00
Neighborhood Revitalization/ Hardening Costs	$272,000,000.00
Subtotal	**$1,604,514,457.36**
Mitigation & Resiliency Costs	$527,622,912.00
Total Infrastructure Impact + Resiliency Costs	**$2,132,137,369.36**

Resiliency and mitigation actions include:

- Acquisition of flood damaged or at-risk structures
- Flood reduction projects such as detention ponds, flood control structures, channel improvements
- Hardening or replacement of infrastructure
- Channel stabilization, erosion protection and river restoration projects
- Dry or wet flood-proofing of structures, including historic structures
- Development of new geospatial products that identify and delineate risk (hazard area maps, topographic and elevation data such as LiDAR)
- Public education campaigns
- Installation of stream gauges and flood warning systems
- Support for community planning efforts that incorporate risk-reduction and resiliency principles

Resiliency and mitigation needs were estimated through several methods including conversations between communities and state and FEMA staff regarding mitigation and resiliency needs, including the identification of potential projects. State staff also engaged federal and state agency partners, reviewed documents and initial plans submitted by local jurisdictions, and reviewed CDBG-DR surveys and damage repair cost assessments submitted by local communities.

Figure 3: Fourmile Canyon (Source: Boulder Co.)

Figure 4: Longmont Wastewater Plant (Source: Survey)

"There are also a number of homes that suffered minimal or no physical damage but where erosion has caused an unsafe situation. The impacts to housing in those cases will continue to be assessed as more is understood about future risk and mitigation.

Erosion is a significant concern and can make a structure completely unsafe for habitation, even if the structure itself is unharmed. This is especially true in steep terrain, lands previously impacted by fire, and stream corridors, which can be said of substantial portions of Boulder County's mountain terrain.

In addition to the houses that may be vacant or abandoned, there are a significant number of homes that no longer have access because a private bridge, culvert, or road or driveway washed away."

-Boulder County Community Survey, Colorado United, Fall 2013

Economic Impact

The economic impact category includes many different types of business and employment losses, as well as impact to the agriculture, tourism and oil and gas sectors. The local economic landscape also consists of many individually-owned and home-based businesses. The $556 million assessed impact includes business-related losses of approximately $501 million and agricultural losses of an estimated $55 million. Funds typically available to assist with economic recovery include SBA, water conservation and revolving funds, unemployment and assistance from the Colorado Department of Labor and Employment, and FSA. **Of the $556 million total impact, an estimated $68.9 million in resources have been made available, for a resulting Unmet Need of $487,137,034.53** as outlined in Table 21 below. The floods have not only caused a present impact on business economic losses but will also have a compounding future impact on them as well, which is not captured in the Unmet Need amount.

Table 21: Economic Recovery

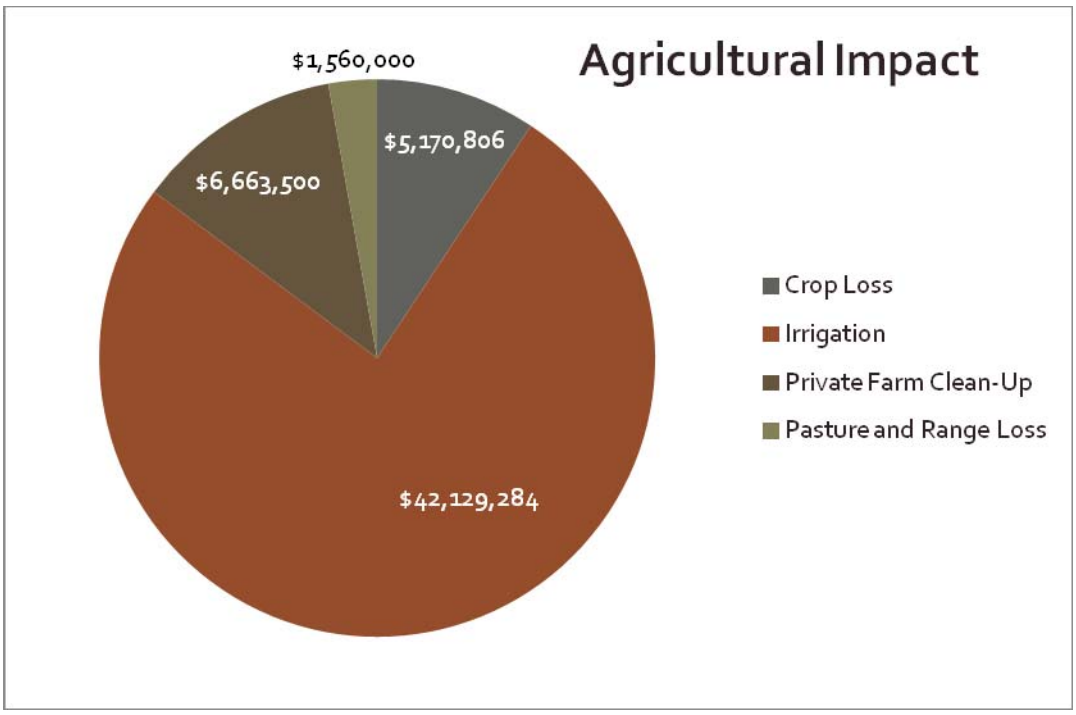
Type	Impact	Resources	Unmet Need
Economic Recovery	$ 556,134,871.70	$ 68,997,837.17	$ 487,137,034.53

Agriculture

Agriculture is the second largest economic contributor to the State of Colorado, after tourism. The industry supplied $40 billion to the State's economy and employs approximately 173,000 people on a yearly basis. The Colorado Department of Agriculture identified agricultural short-term economic loss related to the flooding. Crop loss reflects an impact to approximately 28,535 acres, averaging a 30 percent loss for the season.

This impact was felt drastically across the entire State. Alfalfa, Corn, Sugar Beets, and pinto beans are just a few of the affected acres of crops. Lower-lying agricultural land was affected as the flood waters surged down various rivers and streams. There was a significant impact to irrigation and ditch infrastructure causing significant crop damage due to standing water in the fields that has nowhere to drain. There is also significant debris cleanup, fencing, and land restoration needed to ensure proper revitalization for the ranchers and farmers throughout the State. The agricultural impact will also carry forward with future economic losses. For example, the $42,129,284 impact to irrigation and ditch infrastructure deserves particular attention. If this deficit is not addressed prior to the spring thaw, there is a risk of recreating the September flooding effect due to loss of infrastructure capable of containing the watershed.

In the chart below, irrigation loss considers all diversion or irrigation channels and ditch infrastructure; private farm clean-up shows the impact of debris, fencing, land restoration and leveling on farm irrigation structures; and pasture and rangeland loss reflects the loss of cattle food supply across 39,000 acres.



In addition to its large economic contribution, Colorado agriculture constitutes the largest use of water in the State. Water infrastructure is fundamental to agriculture on the High Plains of Colorado. Within Colorado, most areas receive less than 20 inches of natural precipitation each year, so most of the State requires irrigation to grow crops. The top five crops produced in Colorado need an additional 20 inches of water on average, which must be provided by irrigation. In addition to the irrigation requirements described above, Colorado's agricultural demand includes three other types of water use that are associated with agricultural activity: 1) livestock consumptive use, 2) stock pond evaporation, and 3) losses incidental to delivering irrigation water.

Colorado's geography and weather have driven the policies and projects related to water and irrigation practices in Colorado. Like streams and roads, Colorado law presents a unique ownership structure with respect to ditches, stream gages, and dams. Irrigation ditches are owned by mutual ditch and reservoir companies, including private and public participation. This is unique to Colorado. Irrigation ditch systems in the South Platte Basin were underway as early as 1859. In order to allow for successful irrigated agriculture, Colorado water users developed the doctrine of prior appropriation that is now used throughout the Western United States. The doctrine is simply stated, "first in time, first in right," where the earlier appropriation of water is given priority over subsequent appropriations. While other states have adopted the doctrine in general, Colorado's specific system of water law and administration continues to be unique. Colorado water rights are administered according to a priority date that is established through adjudication in Water Court. Colorado's water law discourages water speculation and requires water to be "beneficially used."

Early attempts by water speculators to obtain water rights and then sell them for large profits gave rise to anti-speculation laws. Colorado water users banded together to form mutual ditch and reservoir companies to put water to a beneficial use. Without ditch and reservoir companies, Colorado water

users would be unable, in many cases, to finance and construct the water infrastructure necessary to the State's agricultural economy.

Business & Employment

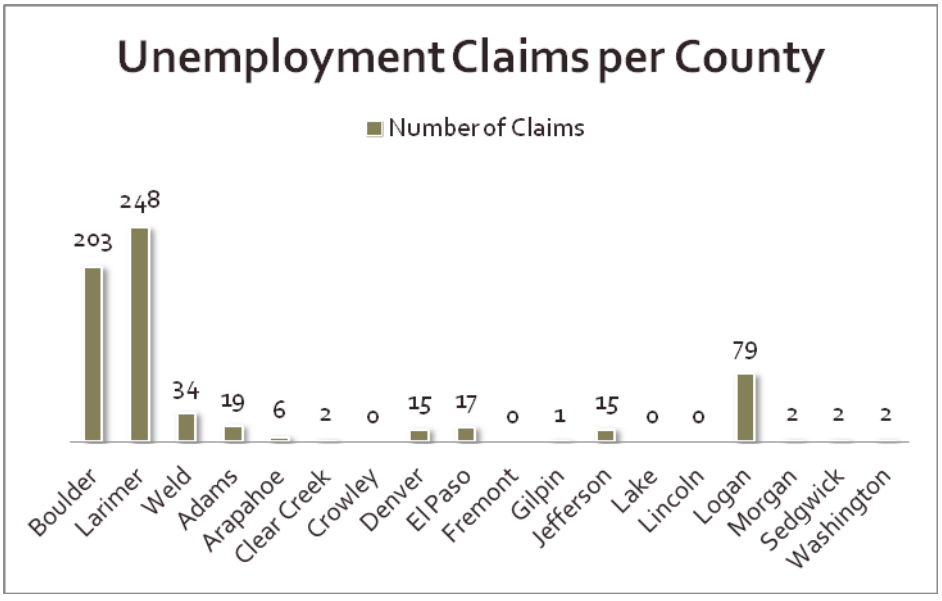
Business impacts throughout the State ranged from moderate to severe damage. Some suffered flooding, leaks, sewage damage, and structural property damage. These impacts then multiplied through cascading effects. For example, one commercial property owner in the City of Boulder lost his entire commercial building due to the intense flood waters. The tenants of that commercial property then lost their businesses along with important client records, the loss of which will impact their ability to efficiently regain future commerce. In another area, a skilled nursing facility suffered major damage to their entire facility causing them to close. Not only did this impact their ability to provide service, but also affected employment income and local spending capacity, thereby affecting other industries. Some businesses had to relocate and some have not been able to reopen. This causes a major economic loss to those communities which have sustained such damage.

The Town of Lyons, located within Boulder County, is a town full of independently owned businesses. Due to the massive flooding, the town was without utilities for a minimum of six weeks after the floods. This lack of power and "no flush" mandates caused many of the businesses to close for lengthy periods, some of them permanently, the impacts of which will continue to ripple through the employment and tax base. Some businesses were unable to continue "business as usual" due to the loss of revenue they sustained while being closed temporarily. Larimer County also encountered economic impacts to local businesses. They have assessed damages to numerous resort cabins, private enterprises, public facilities, and parks.

The floods significantly impacted employment. Unemployment claims immediately after the flooding were the highest in two of the most impacted counties - Boulder and Larimer. Logan and Weld counties also had a high number of claims.

Table 22: Unemployment Claims

Unemployment Claims per County	
County	**Number of Claims**
Boulder	203
Larimer	248
Weld	34
Adams	19
Arapahoe	6
Clear Creek	2
Crowley	0
Denver	15
El Paso	17
Fremont	0
Gilpin	1
Jefferson	15
Lake	0
Lincoln	0
Logan	79
Morgan	2
Sedgwick	2
Washington	2



The North American Industry Classification System (NAICS) is used by agencies to identify the different types of business industries in the United States economy. Of the $19.7 million in Small Business Administration Loans given to date, 16.25 percent were awarded to businesses with NAICS codes within the lodging and restaurant industries. These range from hotels, lodges, and motels to full-service restaurants, limited-service restaurants, and specialty food shops.

Many non-profits were also affected by the floods, causing secondary impacts to the level of social services provided in the region. Some of these non-profit services provide food, shelter, clothing, education, animal shelters, and youth and senior programs. There was a decline in charitable donations after the floods which made it even harder for the non-profits to serve those in their specialized areas. However, even with a smaller budget, many have continued to support and assist the communities most impacted.

As shown in the chart below, 331 impacted area businesses have received $19,787,300.00 in Small Business Loans to date. This data is one of the many factors that reflect the impact the September floods had on the local economy.

Table 23: SBA Loans by County

County	# of SBA Business Loans	Amount of Loans
ADAMS	4	$80,500.00
ARAPAHOE	7	$252,800.00
BOULDER	175	$10,194,600.00
CLEAR CREEK	1	$29,600.00
EL PASO	10	$299,600.00
GRAND	1	$81,700.00
JEFFERSON	6	$413,600.00
LARIMER	101	$7,106,000.00
LOGAN	5	$155,300.00
WELD	21	$1,173,600.00
Grand Total	331	$19,787,300.00

"Meals on Wheels of Boulder/offices were flooded. We were displaced for 11 weeks while the West Boulder Senior Center underwent demolition and then reconstruction…Our Café Classico (dining room/café) was closed for 11 weeks due to the floods. We lost approximately $15,000 in revenue due to this closure.-Boulder County Community Survey, Colorado United, Fall 2013

Tourism

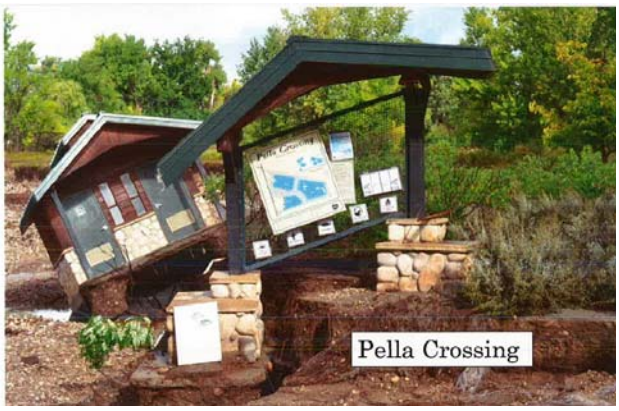


Figure 5: Pella Crossing, Boulder County

Colorado's tourism industry is one of the largest employers in the State, employing more than 200,000 Coloradans. In just a few months, Colorado saw a dramatic decline in tourism due to the catastrophic floods. Tourism-related businesses from hotel, restaurants, and destination attractions have all been impacted. Major visitor draws, like The Rocky Mountain National Park (RMNP) and the community of Estes Park have seen a significant negative impact to their tourism dollars. The RMNP experienced a loss of 427,376 visitors in the months of September and October 2013 alone. Lodging reductions and the decrease in dollars brought in from out of state will decimate town coffers across the region, with impacts to municipal revenues as well as tourism-dependent tax streams. Typical revenue streams include accommodation and food service; arts, entertainment and recreation; retail; and visitor transportation services (both air, ground).

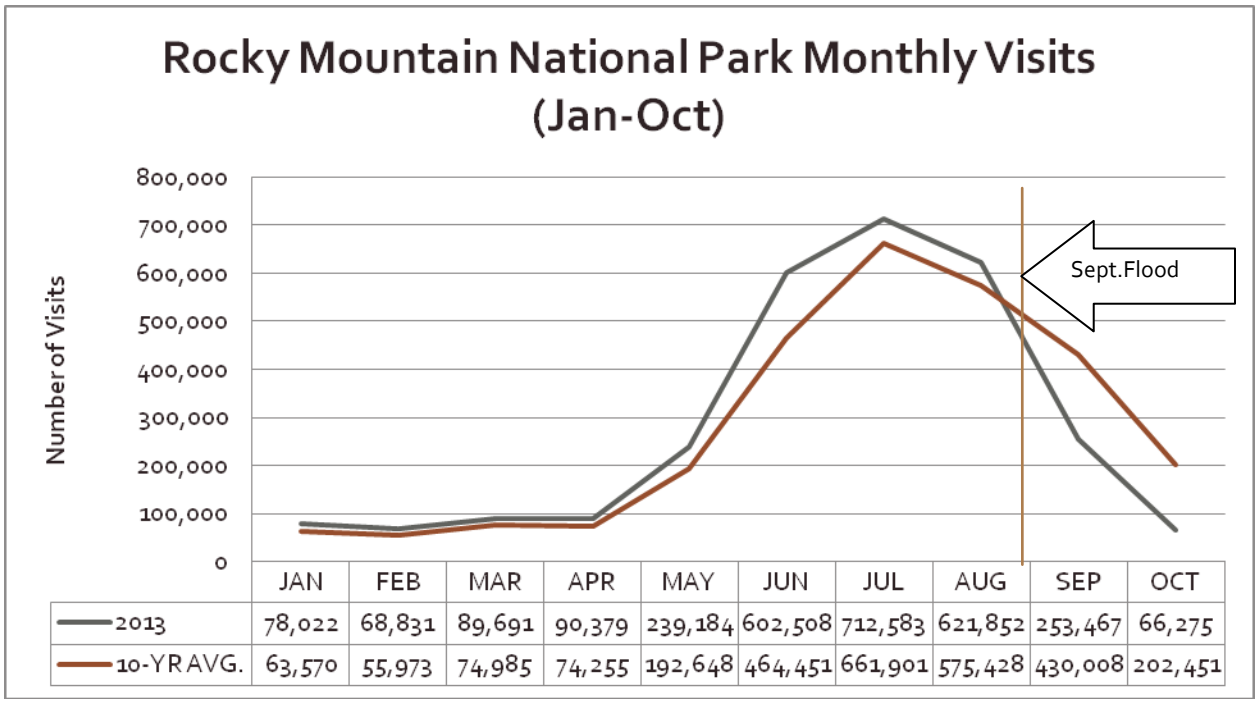
Colorado fears its tourists may decide to vacation elsewhere due to the perception of remaining significant damage. If the decrease in tourism revenue continues, this will lead to continued decline in employment as well.

The number of Rocky Mountain National Park visitors for the month of September was down 52 percent from 2012, and the number of October visitors was down a staggering 70 percent from the previous year. The estimated financial impact of this loss is more than $118 million, when considering an average financial impact of $278 per visitor in accommodation, food service, arts, retail and transportation. This loss does not take into consideration the $1,317,000 in documented lost park fees, or the reduced visitor travel in November 2013 and after.

Larimer County explains:

> *"We know that there have been harsh drops in revenue for many businesses in the Estes Valley…we have heard that many lodging institutions had to refund deposits for visitors that either could not make it to their destination due to road damage, or decided to reschedule their visit. In some cases individual lodging enterprises had to refund over $100,000 of deposits for visits that never materialized…" (Colorado United, Larimer County Community Survey).*

The Colorado Tourism Office and quasi-governmental groups such as Visit Estes Park continue to promote and drive potential tourists to vacation in Colorado. However, with 427,376 less visitors and counting, the industry may benefit from targeted assistance in order to aid in the successful recovery of the region and the State.



	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT
2013	78,022	68,831	89,691	90,379	239,184	602,508	712,583	621,852	253,467	66,275
10-YR AVG.	63,570	55,973	74,985	74,255	192,648	464,451	661,901	575,428	430,008	202,451

The report titled *"Impact of Tourism on the Estes Park, Colorado Economy"* provides valuable information on just how important tourism is to the flood-impacted region. According to the report, jobs related to and/or impacted by tourism in the Estes Park area are:

- In Larimer County, 18.8% of private sector, non-farm jobs (15,500) were in the Leisure & Hospitality Sector in 2011 (14.6% statewide)
- Dean Runyon & Associates estimated that there were 6,720 jobs in the travel industry in Larimer County in 2010
- Summit Economics estimated in 2012 that, based on industry classification, 43% of all jobs (1,139) in the town of Estes Park are employed in tourism and, when based on occupations, that rises to 55% (1,447). When averages, 49% of all employment (1,292 jobs), is directly due to visitors. (Summit Economics, 2012 – Based on data from the American Community Survey 2005-2010, US Census Bureau)

Income levels for the jobs impacted were:

- Based on IMPLAN model analysis, Summit Economics estimates that the Estes Park Local Marketing District (Estes Park, Drake, Glen Haven and rural areas) has 1,338 direct tourism jobs with $31.644 million in earnings, an average income per job of $23,650. In addition, there are another 409 indirect and induced jobs with $15.124 million in earnings, an average of $36,978 per job (Summit Economics, 2012).

The tax benefit/ tax relationship to the tourism industry is:

- Summit Economics estimated that visitors provide the Town of Estes Park with 54.1% of its revenue ($18 million), and cost the Town $15.5 million. The net benefit to the Town and its

taxpayers from visitor spending is an estimated $2.45 million, reducing municipal costs by $418 per resident.

- According to Summit Economics, the 2.03 million visitors to Estes Park in 2011 spent $187 million on lodging, meals, shopping, entertainment, etc., resulting in $154 million in taxable sales.
    - When multiplied by the state sales tax rate of 2.9%, that results in $4.466 million in tax revenues for the State of Colorado.

Section 3: Comprehensive Planning

Colorado has a tradition of considering long-term planning as part of its ongoing governmental strategy. The benefit of the State's planning culture became apparent in the aftermath of the floods as agencies quickly came together to discuss flood impacts and the potential programs at each agency that might assist in recovery. Likewise, a number of communities within the flood impacted area have embarked on strategic recovery planning processes to develop a roadmap with specific actions and identified resources necessary to recover and ultimately make communities stronger and safer than they were before the flood.

Through a coordinated approach with the Governor's Recovery Office, Office of Emergency Management's Local Recovery Liaisons, the Division of Local Government's Regional Managers and Community Development Office and the Division of Housing, the State of Colorado experts have met with, provided high level technical assistance and professional strategic consulting, and designed and facilitated processes across all impacted counties and local jurisdictions. For example, in the immediate aftermath of the floods, teams of State recovery experts met with local officials in all of the highly impacted areas to outline plausible and responsible next steps including planning processes, identification of key regulations such as flood plain codes, community redevelopment scoping, stream corridor master planning, and community visioning. While supporting the individual communities priorities, the State of Colorado has facilitated hundreds of community led visioning processes to date and will continue to do so. Pages 89-91 contain a list of all long-term planning and recovery meetings.

Mitigation and Resiliency are core principles to the overall long-term recovery process following the September 2013 floods in Colorado. CDBG-DR will play a critical role in the overall strategy to reduce the risk to lives, property, and infrastructure in the future so that communities throughout the State will now be more resilient to potential future disasters. Mitigation and resiliency can be accomplished through a number of methods, including but not limited to public information, education, and construction projects that protect improved property and infrastructure from potential disaster events. The State of Colorado will utilize all three methods to support local efforts towards this cause.

The alignment of state and federal agencies, whose

Figures 5 & 6: Community planning and recovery efforts (Source: Colorado United)

programs are designed towards the common goal of safer and more resilient communities, will be central to the success of mitigation and resiliency efforts. Agencies involved in mitigation and resiliency efforts include the Governor's Office, Department of Local Affairs, Office of Emergency Management, Department of Natural Resources, the Department of Public Health and Environment, and the Department of Transportation, as well as the flood impacted local communities. Programs that will be critical to the State and local communities' overall mitigation and resiliency efforts will include CDBG-DR, the FEMA Public Assistance and Hazard Mitigation Grant Programs, the Natural Resources Conservation Service Emergency Watershed Protection Program, and the multiple State programs administered through the agencies identified above.

CDBG-DR funds will be made available to local communities to complement projects that meet CDBG-DR criteria and national priorities that are partially funded by other agencies such as FEMA and the Natural Resources Conservation Service. These projects may include: the acquisition of flood damaged and flood prone properties, including those that are considered blight in flood impacted communities; infrastructure repair or improvements in order to restore critical services to the community, including low and moderate income populations; stream-bank stabilization and debris removal projects that reduce immediate threats to properties as well as public health and safety; and, projects to improve or expand infrastructure to facilitate new housing or infrastructure outside of areas at risk from floods or other hazards. Additionally, CDBG-DR funds may be used to support projects to develop educational information that can better inform development decisions, development of risk based products such as hazard area delineations (i.e. floodplains, geologic hazard areas) in order to help local communities make safe and hazard-aware redevelopment decisions.

Several different mitigation activities will be executed to provide rehabilitation to the infrastructure throughout the State. Flood reduction projects such as detention ponds, flood control structures, and channel improvements will be completed to assist in this effort. Installation of flood warning systems will also support the mitigation efforts. These activities have been created to reduce the risk of extensive damage to the roads and bridges in Colorado.

Section 4: Method of Distribution

The flood of September 2013 was the most pervasive and devastating disaster the State of Colorado has suffered in a generation. To optimize the use of limited recovery funds and enable the strongest recovery possible, the State took a measured approach to determining a method of distribution. Damage assessments prepared by FEMA and SBA and data collected from surveys distributed to local stakeholders in the wake of the disaster informed the initial funding strategy. This was presented at stakeholder and public meetings, and in a webinar, and the State fine-tuned the distribution strategy in response to comments submitted by local agencies and flood victims. The distribution approach outlined below attempts to balance the complex and oversubscribed needs of the impacted communities and allocates accordingly to promote long-term recovery. Although the unmet needs far exceed the resources available, the following programs will begin to address the housing, infrastructure, and economic development needs of the declared areas, while maintaining compliance with the National Objectives and eligible activity requirements of the CDBG-DR regulations and waivers.

Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represents long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Economic recovery is a critical component of short and long-term, sustainable recovery, and is funded at an amount necessary to ensure the first and second income generators in the region--tourism and agriculture, respectively--receive the assistance they need to keep businesses open, residents employed, and the tax coffers full. The objective eligibility criteria for each program and the eligible applicants are described more fully below under each program heading. The State anticipates that it will be able to serve 576 households through its household assistance program and 261 households through its new construction program, 450 businesses through its economic revitalization programs, 90 agriculture businesses through the agriculture grant program, and 55 total projects will be eligible under the infrastructure program.

All of the programs described below will launch simultaneously as soon as funds are available. Provided that the Action Plan is approved in the second quarter 2014, and there are no additional amendments, the State expects that the funds will be expended by the second quarter of 2016.

All eligible applicants can submit applications online with the assistance of Department of Local Affairs, Office of Economic Development, Department of Agriculture, and Office of Emergency management. The applications will be submitted to the respective offices or agencies running the programs and reviewed by a review committee. Applications for housing will be reviewed by the State Housing Board employing a method currently used for other CDBG funds. Applications for economic recovery will be evaluated by the Office of Economic Development and Department of Agriculture on a first come basis using the method currently used today to distribute economic and other CDBG funds. Applications for infrastructure grants will be evaluated by an inter-departmental team used to evaluate other federal grants. Once applications are finalized by the Departments, the Department of Local Affairs will have final signatory authority to ensure the applications are compliant with the program guidelines. The Department of Local Affairs will distribute the funds and ensure compliance.

The State will assess each applicant's ability to carry out the scope of their proposal within the timeframe of the DR funding. The capacity assessment will be based on such criteria as whether the applicant (and their team) has administered like programs/projects, their timeliness with previous contracts and their on-going compliance with programs. When an area or applicant does not have sufficient capacity, the State will work with the agencies in developing capacity and/or assist in finding partners that do have the capacity to meet the local need.

CDBG-DR Budget State of Colorado

No. FR-5696-N-07 Allocation Distribution to Colorado

Housing		Unmet Need		Program Budget
	$	471,000,000		
Household Assistance			$	12,826,900
New Construction			$	10,440,500
Subtotal	$	**471,000,000**	$	**23,267,400**

Economic Recovery		Unmet Need		Budget
	$	487,000,000		
Grant Program			$	5,000,000
Recover Colorado Loan			$	4,000,000
Agriculture			$	4,500,000
Tourism Marketing			$	500,000
Subtotal	$	**487,000,000**	$	**14,000,000**

Infrastructure - Road and Bridge		Unmet Need		Budget
Private Roads & Bridges			$	2,000,000
Total	$	-	$	**2,000,000**

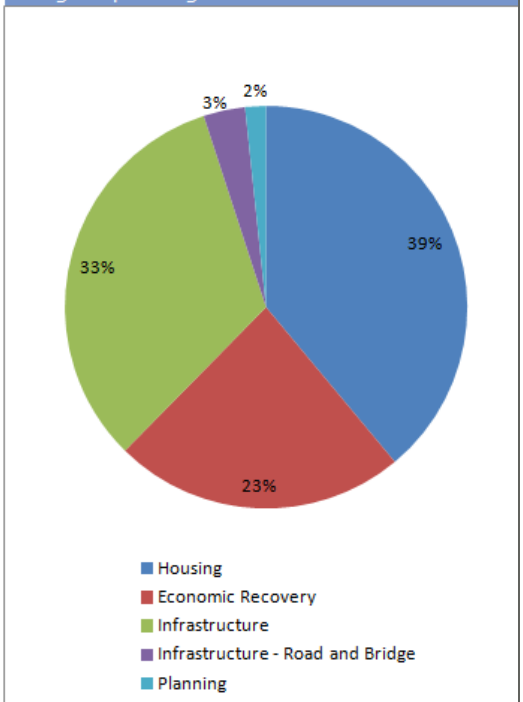
Infrastructure		Unmet Need		Budget
Recover Colo Grant	$	1,159,000,000	$	19,477,600
Total	$	**1,159,000,000**	$	**19,477,600**

Planning		Budget
Resiliency Visioning & Strategic Planning	$	1,000,000
Total	$	**1,000,000**

Administration	$	3,055,000

TOTAL	Unmet Need	CDBG-DR Allocation
	$ **2,117,000,000**	$ **62,800,000**

Budget Spending CDBG-DR



Note: The Unmet Need amounts in the budget above are rounded to the nearest 100,000. For detailed Unmet Need data, see "Needs Assessment."

CDBG-DR Program National Objectives

Section 101(c) of the authorizing statute for the Community Development Block Grant (CDBG) program sets forth the primary objective of the program as the development of viable communities by the provision of decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low-and moderate-income. The statute further states in Section 104(b)(3) that this is to be achieved in the CDBG program by ensuring that each funded activity meets one of three named national objectives.

Those three national objectives are identified as:

1) Benefiting Low- and-Moderate-Income Persons;
2) Preventing or Eliminating Slums or Blight; and

3) Meeting Urgent Needs (Meeting other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available to meet such needs.)

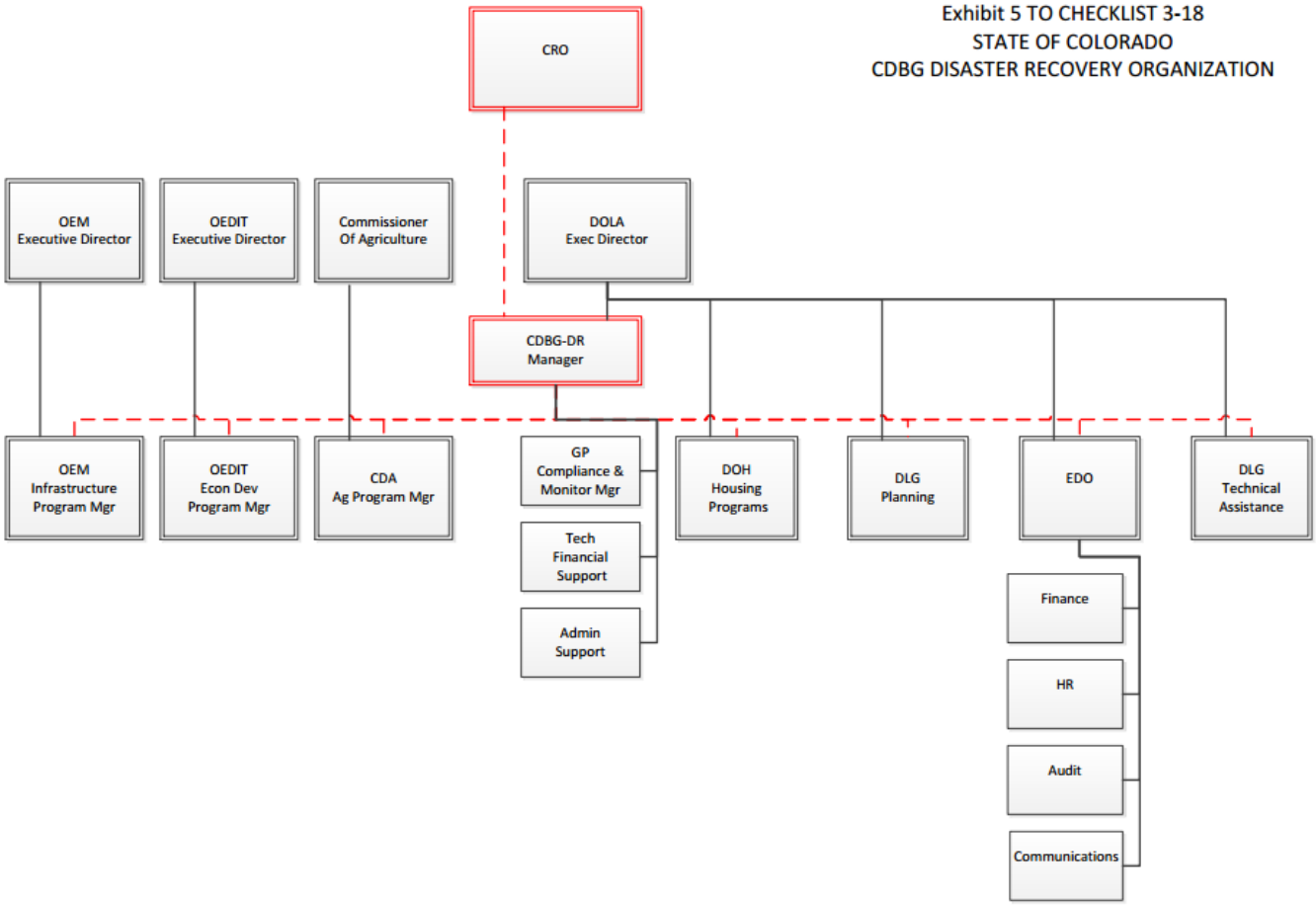
The statute also states that each grant recipient must ensure that at least 70% of its expenditures over a particular time period must be used for activities qualifying under the first of those national objectives (that of Benefiting Low-and-Moderate-Income Persons.) A family qualifies as Low-and-Moderate Income (LMI) if they make less than 80% of the Area Median Income for their family size. **For the purposes of the CDBG-Disaster Recovery grant to the State of Colorado, the expenditure requirement has been reduced to 50% of funds going to benefit LMI persons.**

As indicated above, the program rules state that in order to be eligible for funding, every CDBG-funded activity must qualify as meeting at least one of the three national objectives of the program. This requires that each activity, except certain activities carried out under the eligibility categories of Planning and Capacity Building, Program Administration, and Technical Assistance, meet specific tests. An activity that fails to meet one or more of the applicable tests for meeting a national objective is in noncompliance with CDBG rules. The requirement that each activity must meet a national objective should not be confused with the requirement that at least 50% of Colorado's CDBG-DR funds be used for activities that benefit L/M income persons.

Administrative Design

The Governor has designated a Chief Recovery Officer (CRO) to oversee implementation of the Disaster Recovery program. The Colorado Department of Local Affairs (DOLA) will serve as the administrative and fiscal agent, responsible to HUD for program oversight, reporting, and compliance under the general guidance of the CRO. Disaster Recovery funds are divided into three main programs, with Housing administered by the DOLA Division of Housing (DOH), Infrastructure administered by the DOLA Division of Local Government (DLG) in conjunction with the Office of Emergency Management (OEM), and Economic Recovery administered by the Office of Economic Development and International Trade (OEDIT) and the Colorado Department of Agriculture, as outlined in the Figure below.

SECTION I
Exhibit 5 TO CHECKLIST 3-18
STATE OF COLORADO
CDBG DISASTER RECOVERY ORGANIZATION



Leveraging of Funds

The State worked with HUD, FEMA, SBA and other federal agencies to identify and catalog available sources of federal assistance for disaster recovery. As outlined in the State's procedure to prevent duplication of benefits, the State will require that all sources (federal, State, local, private) and amounts of disaster assistance received or reasonably anticipated to be received are documented with submission of an application for CDBG-DR funding.

Colorado recognizes the importance of leveraging limited CDBG-DR funds with other funding sources from all levels, to extend the benefit of disaster relief monies as far as possible. The State will ensure that CDBG-DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

- FEMA Individual Assistance grants,
- FEMA Public Assistance grants,
- FEMA Hazard Mitigation Grant Program,
- SBA Disaster Loans,
- National Flood Insurance Program payments,
- Private insurance,
- Federal Highway Administration Emergency Relief Program,

- Natural Resources Conservation Service Emergency Watershed programs,
- Water Conservation District funds,
- USDA Farm Service Agency's Emergency Forest Restoration Program,
- Drinking Water and Water Pollution Control funds, and
- Private foundations

Colorado designed its programs to efficiently ensure a positive lasting effect for individuals and communities affected by the floods. Consistent with the Department of Local Affairs' typical funding approach, the State will seek out funding partners and attempt to maximize investments from additional financing sources for flood recovery efforts. Additional sources of leverage may include but are not limited to:

- Governor's Energy Office
    - Energy Management Assistance Program
    - Energy Performance Contracting
    - Weatherization
    - Energy Savings Mortgages
- Colorado Housing and Finance Authority
    - Low-income Housing Tax Credits
    - FHA 203(h)
    - CHFA Advantage
    - CHFA HomeOpener
    - CHFA SmartStep
    - FHA Streamline Refinance
    - FHA 203(k)
- Colorado Division of Housing
    - Colorado Housing Investment Fund
    - Neighborhood Stabilization Program (Program Income)
    - Housing Development Grant
    - Private Activity Bonds

The State will monitor to prevent duplication of benefits and continue to work with other funding sources to make sure that every CDBG-DR dollar counts toward revitalizing local and regional economies. CDBG-DR funds will work in coordination with these funding sources, with care taken to ensure funds neither supplant nor duplicate previous awards. The State will provide technical assistance to local and county governments to ensure they adequately utilize FEMA and other federal funding options prior to receiving assistance through CDBG-DR programs.

In addition, the State will initially utilize between 51-63% of its program funds for activities that benefit Low-and-Moderate Income individuals but anticipates this number to increase as housing programs are fully implemented.

Table 24: LMI Benefit by Budget Category

LOW-AND-MODERATE INCOME (LMI) BENEFIT BY BUDGET ALLOCATION

	Program Allocation	National Objective(s)	LMI Service Rate	LMI Budget
Housing				
Subrecipient Programs	$ 12,826,900	LMI/ Urgent Need/ Slum & Blight	75%	$ 9,620,175
Subgrantee Programs	$ 10,440,500	LMI/ Urgent Need	75%	$ 7,830,375
Subtotal	**$ 23,267,400**			**$ 17,450,550**
Economic Recovery				
Grant Program	$ 5,000,000	LMI Jobs	50%	$ 2,500,000
Recover Colorado Loan	$ 4,000,000	LMI Jobs	50%	$ 2,000,000
Agriculture	$ 4,500,000	LMI Jobs	50%	$ 2,250,000
Tourism Marketing	$ 500,000	LMI Jobs	0%	$ -
Subtotal	**$ 14,000,000**			**$ 6,750,000**
Home Access Program				
Private Roads & Bridges	$ 2,000,000	LMI/ Urgent Need	50%	$ 1,000,000
Subtotal	**$ 2,000,000**			**$ 1,000,000**
Infrastructure				
Recover Colo Grant	$ 19,477,600	LMI/ Urgent Need/ Slum & Blight	20%	$ 3,895,520
Subtotal	**$ 19,477,600**			**$ 3,895,520**
Planning				
Resiliency Visioning & Strategic Planning	$ 1,000,000.00	LMI/ Slum & Blight		$ -
Subtotal	**$ 1,000,000.00**			**$ -**
Administration	*$ 3,055,000*			
TOTAL:	**$ 62,800,000**		**50%**	**$29,096,070.00**

Housing Programs

The flooding significantly impacted Colorado's housing sector with approximately $676 million in damage to homes and an additional $5.9 million in damage to private roads and/or bridges. The damage extended to eighteen presidentially declared counties in Colorado, with the most impacted areas concentrated in Boulder, Larimer, and Weld counties. As discussed in the Needs Assessment, local housing prices were already out of reach for the average Coloradan, and tight rental markets are exacerbated by the impact of the floods. Hundreds of homes were destroyed or severely damaged, leaving families living in substandard or unsafe conditions, or causing them to be displaced from their communities and places of employment.

Based on available data described in the Needs Assessment, Colorado's housing needs include:

- Assisting homeowners with reconstruction or rehabilitation of their homes, including the repair of private roads and bridges to access impacted homes.
- Assisting those displaced through the purchase of a new home via down payment assistance.
- Providing temporary rental assistance to displaced homeowners and renters while their homes are being repaired or their replacement homes constructed.
- Replenishing the stock of affordable rental housing, which is especially important to those whose lives have been impacted by flood-related stress and employment disruption.
- Demolishing and clearing blighted housing structures destroyed by the floods.
- Performing redevelopment planning to address community sustainability and long-term recovery.
- Providing housing counseling and technical assistance to homeowners as they navigate the rebuilding/ relocation process. This activity will be performed as a leveraged activity and will not come out of CDBG-DR funds, instead utilizing the services of non-profit provider networks already in place.

Colorado will ensure new construction and substantially rehabbed properties are at a minimum BFE plus one foot unless the mountainous terrain necessitate additional measures to flood-proof the properties as determined by local code. Approximately 39 percent of the State's allocation will be used for housing programs as outlined below. At least 80 percent of the aggregate funding for housing must be spent in Boulder, Larimer, or Weld counties. The State of Colorado will control this through the application process ensuring that grants approved outside of the three most impacted counties will not exceed 20 percent of the program allocation. Within the three most impacted counties, DOLA will utilize a distribution methodology whereby 60percent of the award will be based on the county's proportion of FEMA designated major and severe damage and the remaining 40percent will be available to all three counties based on a competitive process. This will ensure that all three of the most impacted counties receive a significant portion of the resources, while also allowing those projects that most directly address the need and are ready for implementation to move forward.

For the purpose of providing disaster recovery assistance, the State of Colorado defines demonstrable hardship as a household's adjusted family income (as defined by 24 CFR 5.611 as Annual Income minus Deductions) being less than or equal to 30percent of the Area Median Income for the family size. Where a household can prove such a demonstrable hardship and that more than 30percent of their income was spent on housing costs, then the State of Colorado will consider the household's income when calculating temporary rental (and relocation) assistance under 49 CFR 24.402 (b) and 24.404.

Table 25: Funding Distribution for Housing Activities

Funding Distribution for Housing Activities	
Program Name	**Total Funding**
Household Assistance Programs	$ 12,826,900
Housing Repairs	
Temporary Assistance	
Housing Purchase (Down Payment Assistance)	
Clearance and Demolition	
New Construction Programs	$ 10,440,500
Construction – Rental	
Construction – Single Family	
TOTAL	**$ 23,267,400**

Many residents lost their homes due to the flooding and are now faced with the challenge of rebuilding and restarting their lives. The single family housing construction programs will allow homeowners to rebuild quality homes or repair their existing homes. Additional affordable rental units will be constructed through the multifamily program in order to relieve the increased pressure on the rental market caused by the floods, provide replacement housing to homeowners who lost their homes who may not be in a financial position to purchase a new home, and provide affordable housing to renters throughout the impacted area.

Reconstructing or repairing damaged homes will provide an opportunity to implement updated construction methods that emphasize high quality, durability, and energy efficiency. The State will work with local jurisdictions receiving recovery funds to encourage enforcement of modern building codes; mitigate future hazard risk, including flooding, unstable slopes, and mold; and ensure that homes are repaired or built to a higher standard than existed before the floods. New construction and Down Payment Assistance (DPA) is limited to structures outside of the floodway in order to reduce repetitive losses and future hazard risk. Rehabilitation is allowed inside the floodplain as long as the rehabilitated home will become eligible for the NFIP and can attain building permits. Beneficiary applications will be reviewed to identify all funding sources made available to the homeowner, including FEMA, SBA, and private insurance, to ensure non-duplication of benefits. Loaned funds will be secured by a Deed of Trust, where applicable.

To maximize efficiency and foster rapid implementation, the State will award funds to sub-recipients already operating housing programs in flood-impacted areas, making use of existing capacity and building on local housing market knowledge. Existing State-local partnerships will enable this expedited strategy for the temporary rental assistance, single family owner occupied rehabilitation, and down payment assistance programs.

Household Assistance Programs

Allocation for Activity: $12,826,900

The allocation of funds is available for use in any of the four household assistance programs described in this section. Given that temporary rental assistance, down payment assistance and housing repairs are critical resources for our displaced citizens and those living in substandard housing following the disaster, the State will assure that these services are available through at least one applicant in the three most impacted counties. In each of these impacted counties these services will be provided by local partner organizations, which will be awarded through an open application process in keeping with the Division of Housing's established grants and loans process.

Temporary Rental Assistance (Single Family and Multifamily)

Temporary relocation rental assistance will be available to low-income applicants while their single family or rental home is being constructed or repaired. The maximum temporary assistance allowed will be based on fair market rental rates at the time of the program implementation and priority will be given to residents previously residing in damaged or destroyed mobile homes, those at or below 30 percent AMFI, and only those whose homes received direct flood damage are eligible. Temporary assistance will be based on fair market rental rates for a maximum of two years, not to exceed the term of the CDBG-DR funding.

The temporary relocation rental assistance program will be administered in conformance with the Uniform Relocation Act as described in Federal Register 78 FR 14329, published on March 5, 2013. Efforts will be made to connect applicants to other social services providers while they receive disaster recovery assistance. The maximum per-household dollar amount includes funds used both for actual rent payments and the security deposit, as well as for any incurred moving expenses (i.e. rental of moving trucks, boxes, gas, moving companies) for an awarded household. Should the funds be used to pay security deposits, any returned funds refunded upon vacancy of said unit must be returned to the administering agency as program income, to be re-used for any eligible housing program administered under the sub-recipient program.

Maximum Award: $1,000,000 per sub-recipient ($20,000 per household)

Eligible Applicants: Sub-recipients may include units of general local government, non-profits and housing authorities with experience in affordable housing programs and an existing network in the impacted area, and demonstrated capacity to carry out a tenant based rental assistance program.

Beneficiary Eligibility Criteria: Homeowners and renters directly impacted by the floods, with priority given to persons with disabilities, seniors, and those who resided in modular homes or manufactured housing units (MHUs). Applicant eligibility criteria include households at less than 80 percent AMFI, with priority given to those at or below 30 percent AMFI.

National Objective: Low-and-moderate income

Housing Purchase (Down Payment Assistance)

As part of the Down Payment Assistance (DPA) program, applicants who want to purchase a primary residence due to loss of residence during flooding may qualify. The program will provide a maximum household award of $50,000. Households that lost their manufactured/ mobile housing units may also be eligible for the DPA program.

Eligibility criteria include households at less than 80 percent AMFI that were directly impacted by floods and are able to secure additional funding to complete the purchase of the new single family, manufactured or modular home, if necessary. Beneficiaries defined by HUD as first-time homebuyers must successfully complete a homeownership education/counseling program and present a copy of the course completion certification to the agency. This will not be a requirement for non-first time homebuyers, but will be available to them at their request. Sub-recipients will provide housing counseling through leveraged funding (such as counseling funding available through the settlement funds allocated to DOH by the Attorney General's office) or use of a third-party social service provider already in operation in their community and funded by outside sources. The State will encourage applicants to make additional pre- and post-purchase foreclosure prevention counseling available to new homeowners, and require access to this counseling for households under 50 percent AMFI. New single family, manufactured and modular homes must meet Housing Quality Standards and must not be located in a FEMA designated high-risk area, such as a floodplain.

Maximum Award: $500,000 per Sub-recipient annually ($50,000 per household)

Eligible Applicants: Sub-recipients may include units of general local government, non-profits and housing authorities with experience in similar affordable housing programs, an existing network, and capacity.

Beneficiary Eligibility Criteria: Households who were directly impacted by the floods and are at or below 80 percent AMFI. Priority will be given to residents previously residing in damaged or destroyed manufactured housing.

National Objective: Low-and-moderate income

Housing Repairs (Single Family Rehabilitation)

Repairs include renovations necessary to bring the damaged home to meet the HUD CPD Green Building Retrofit Checklist, and DOLA DOH Single Family Rehabilitation Standards. Rehabilitation will be allowable inside the floodplain as long as the rehabilitated home will become eligible for the NFIP and can attain building permits. The program also includes the relocation of single family and modular homes in stable or undamaged structure to be moved from their current vulnerable locations in floodplains to a permanent location outside of the floodplain. Eligibility criteria for beneficiaries include households' primary residences that suffered direct flood damage and can provide proof of home ownership, such as through a Deed of Trust. Priority will be given to persons with disabilities, seniors, and those who resided in manufactured housing units (MHU) that were damaged or destroyed. **A property is not suitable for rehabilitation if and when the cost to repair the damage exceeds 50 percent of the pre-flood county appraised value, on a per-house basis.**

Maximum Award: $4,000,000 per sub-recipient annually ($100,000 per household for rehabilitation; $100,000 per household for structural relocation)

Eligible Applicants: Sub-recipients may include units of general local government, non-profits, housing authorities, and urban renewal authorities with experience in affordable housing development, affordable housing programs and an existing network in the impacted area.

Beneficiary Eligibility Criteria: Homeowners who were directly or indirectly impacted by the floods, with priority being given to those who were directly impacted and to persons with disabilities, seniors, and those who resided in modular homes or manufactured housing units (MHUs). Household income must be at or below 80 percent AMFI for at least 75 percent of beneficiaries served.

National Objective: Low-and-moderate income and Urgent Need

Clearance and Demolition

The floods left some areas with concentrated damage to groups of housing structures that have been abandoned, cannot be restored, and may be in high-risk flood hazard areas. These unsound structures pose health and safety risks to the surrounding community and must be removed in order to promote comprehensive recovery. Applications may be made on behalf of communities that had significant, localized damage and destruction that will require them to acquire several deteriorated buildings located in a slum/blight area for demolition and clearance.

Maximum Award: $500,000

Eligible Applicants: Units of General Local Government or their designated non-profits or housing authorities.

Eligibility Criteria: The acquired property is in an area designated by the Unit of Local Government as a slum or blighted area, and the property will be used in a manner which addresses one or more of the conditions which contributed to the deterioration of the area.

National Objective: Removal of Slum & Blight

New Construction Programs

Allocation for Activity: $10,440,500

The allocation of funds is available for use in either of the two new construction programs as described below. As described on page 49, controls will be in place through the application process to ensure that at least 80% of the resources go to the three most impacted counties and that 60% of those resources will be on an allocated basis proportional to the number of major and severe damaged housing units identified through the FEMA Individual Assistance application process.

Single Family Housing New Construction

For single-family housing projects, housing construction will include new construction and land acquisition for stick-built and modular built homes. Funds will be administered through sub-grantees, with a maximum grant award of $4,000,000 annually per sub-grantee. Sub-grantees will then perform application intake and assessment, including income and duplication of benefit reviews. Individual household awards under the sub-grantee contract will be limited to $100,000.

Eligibility criteria for beneficiaries of the program include homeowners directly or indirectly impacted by the floods with priority given to households directly impacted by the flood. After all priority households' needs are addressed, individuals with indirect impact may be served. Indirect impact from the floods may include, but is not limited to, documented loss of job due to flooding and/or no access to home due to loss of private road or bridge or unstable slope, even if there are no damages to the home. Homeowner applicants will be responsible for providing additional funding if the maximum award does not cover the entire cost of the home, for which purpose this fund may be coupled with the Down payment Assistance Program.

Projects funded shall substantially meet Low-Water Landscaping (e.g. Denver Water Board Standards), and one of the following (listed in order of preference):

- Enterprise Community Partners, Green Communities Criteria
- U.S. Green Building Council, LEED for Homes, Silver or above
- The most recently released International Energy Efficiency Codes (IECC)
- U.S. Environmental Protection Agency, Energy Star 2011 for New Homes
- U.S. Green Building Council, LEED for Homes, Certified
- U.S. Environmental Protection Agency, Energy Star for New Homes

Maximum Award: $4,000,000 per year

Eligible Applicants: Sub-grantees may include units of general local government, non-profits, housing authorities, urban renewal authorities with experience in affordable housing development an existing network, and capacity.

Targeted Beneficiaries: Households who were directly or indirectly impacted by the floods, with priority given to those who were directly impacted and to persons with disabilities, seniors and those who resided in damaged or destroyed modular homes or MHUs. Household income must be at or below 80 percent AMFI for at least 75 percent of beneficiaries served.

National Objective: Low-and-moderate income and Urgent Need

Multifamily Rental New Construction

The multifamily housing construction program will include new construction and land acquisition, for townhomes, duplexes, and properties with more than 8 units for rental purposes in order to replace units lost from the regional affordable housing stock due to the floods. Program funds may be used in proportion to the number of affordable units in the development. Sub-grantees will have policies and procedures to ensure leasing at proper rent levels and to income-eligible applicants. A thirty-year land use covenant will be utilized in these multi-family development projects. The State offers preference for new construction multifamily projects serving the homeless, domestic violence, and other special needs.

Projects funded shall substantially meet Low-Water Landscaping (e.g. Denver Water Board Standards), and one of the following (listed in order of preference):

- Enterprise Community Partners, Green Communities Criteria
- U.S. Green Building Council, LEED for New Construction version 2.2 or later, Silver or above
- The most recently adopted International Energy Efficiency Codes (IECC)
- U.S. Green Building Council, LEED for New Construction version 2.2 or later, Certified

Maximum Award: $4,000,000

Eligible Applicants: Sub-grantees may include units of general local government, non-profit and for-profit developers, and housing authorities, with experience in affordable housing development/ programs, an existing network, and capacity.

Targeted Beneficiaries: Leasing priority will be given to households with special needs, elderly, homeless population, and those suffering from domestic violence at or below 60 percent AMFI, and those who resided in damaged or destroyed modular homes or MHUs.

National Objective: Low-and-moderate income

INFRASTRUCTURE (Private Roads and Bridges) *[ELIGIBILITY OF THIS PROGRAM IS PURSUANT TO APPROVAL OF A WAIVER FROM HUD]*

Homeowners who are unable to access their homes due to damage to roads that are non-county maintained need assistance. FEMA public assistance may not be available to repair these roads due to their lack of public maintenance, even though they provide critical emergency access to families and homeowners, especially when considering the danger posed by forest fires. Without the reconstruction of the private roads and bridges, residents will be at high risk when the next disaster occurs. At present, the affected homeowners do not have access to homes or evacuation routes.

The maximum award per sub-recipient is limited to $2 million. Sub-awards under the sub-recipient contract will be limited to $500,000.

Eligibility criteria specify that 51 percent of the recipients must be low-and-moderate income households unless Urgent Need can be substantiated. Funds not expended on the Home Access Program will revert to one of the single family construction programs.

Allocation for Activity: $2,000,000

Maximum Award: $2 million per sub-recipient ($500,000 per target area)

Eligible Applicants: Sub-recipients may include special districts and Units of General Local Government.

Beneficiary Eligibility Criteria: Applicants must demonstrate that the private road or bridge access was directly damaged by the floods and provides sole access to the target homes, and demonstrate that lack of access is a health and safety issue pertaining to emergency vehicle access, particularly in the event of forest fires.

National Objective: Low-and-moderate income and Urgent Need

Infrastructure Programs

Extreme heavy rainfall and flooding caused extensive damage to Colorado's infrastructure. Due to the mountainous terrain, the valleys acted as a funnel for the surging flood water. The high velocity of the flood water became extremely erosive to everything in its path.

As the flood water surged down rivers and creeks carrying large amounts of debris, hundreds of miles of roadways and bridges were not only damaged, but also buckled, shattered and were washed off of hillsides. Water and wastewater lines were destroyed, and sewage treatment plants were submerged and forced to shut down. The Colorado Oil and Gas Conservation Commission (COGCC) raised concerns of contamination as reports that oil lines and containment facilities failed and leaked into the flood waters. These leaks raised many public health concerns such as E. coli entering the potable supply.

The State, along with support from federal agency partners and local municipalities, worked diligently to perform assessments of the impact of the flood and has already engaged in comprehensive recovery efforts tied to planning to mitigate the impact of future flooding. The rehabilitation of Colorado's infrastructure and continued collaboration with federal funding partners is imperative to long-term recovery. The Recover Colorado Infrastructure Grant Program will be administered by the DOLA Division of Local Government (DLG) in conjunction with the Office of Emergency Management (OEM).

Recover Colorado Infrastructure Grant Program

Description of Activity

CDBG-DR funding will be applied to the local cost share of projects funded under any of the following:

- *FEMA Public Assistance Projects*[2]**:** Those projects that restore critical services and infrastructure, including roads and bridges, water and wastewater, parks, public facilities, etc. FEMA provides 75 percent of the project cost and the State provides one half of the non-FEMA cost share (12.5 percent of the project total). CDBG-DR funds would go to pay for some or all of the local 12.5 percent cost share. Additionally CDBG-DR may be used to pay to enhance or modernize existing PA projects where those enhancements are otherwise FEMA PA ineligible.
- *FEMA Hazard Mitigation Grant Program Projects***:** Those cost-effective projects that reduce risk to future disasters to life, private property[3] and/or public infrastructure. Projects must pass a benefit cost-analysis. FEMA provides 75 percent federal funding and the State provides one half of the non-FEMA cost-share (12.5 percent of the project total). CDBG-DR funds would go to pay for some or the entire local 12.5 percent cost share. Additionally CDBG-DR may be used to pay to enhance hazard mitigation projects where those enhancements cannot be funded through

[2]It is important to note that not all FEMA or other federal projects contain activities that are eligible under CDBG-DR. For example, some activities such as assisting certain public facilities or replacing equipment may qualify under FEMA but not under CDBG-DR. Only CDBG-DR eligible activities will be funded under this program.
[3] Debris removal and improvements to private property are not currently eligible under CDBG-DR; however the State is seeking a waiver from HUD to allow this to become an eligible activity.

HMGP. Eligible activities must be part of the overall recovery and be incorporated into rebuilding activities and could include::

- Property acquisition and demolition (stick-built homes and mobile homes)
- Property elevation
- Minor localized flood reduction projects (i.e. detention ponds, increased channel capacity)
- Infrastructure improvements or replacement

- *Natural Resources Conservation Service Emergency Watershed Protection Program Projects:* Projects that reduce imminent/exigent flood related hazards to life and public and private[4] property, including projects to stabilize stream banks and remove debris from waterways. NRCS provides 75 percent if the project cost and the State will provide one half of the non-Federal cost-share (12.5 percent of the project total). CDBG-DR funds would go to pay for some or all of the local 12.5 percent cost share.
- *Other Infrastructure Projects Contributing to the Overall Recovery of the Community:* These projects could include larger scale regional hazard mitigation projects including major flood control structures that protect low to moderate income populations, and/or critical infrastructure; stream stabilization and restoration projects that reduce long-term risk and/or improve community amenities (i.e. greenways, recreation corridors), purchase and installation of equipment necessary to protect lives, property and critical infrastructure (i.e. warning systems, stream gauges, generators), and improvements critical to the community's overall recovery from the flood event and resiliency to future events. CDBG-DR funds will be awarded based on objective weighted criteria, local funding availability and project cost.

Allocation for Activity: $19,477,600

The State of Colorado will use the same criteria as the housing programs to ensure that 80% of the resources will support the three most impacted counties. This will be controlled through the application process by ensuring that projects approved outside of these counties do not exceed 20% of the infrastructure allocation. Additionally, 60% of that 80% allocation will be allocated to the three most impacted counties based on the relative percentage of the approved dollar amount of FEMA Public Assistance projects including those under development that include a reliable project cost. This provides a consistent methodology across counties by which to approximate relative damages. The remaining 40% will be available only to the three most impacted counties on a competitive basis.

Maximum Award

The CDBG-DR award amount maximum will be $5 million.

Selection Criteria

Infrastructure funds will be distributed through an application process that evaluates objective weighted scoring criteria. The scoring criteria are included in the table below. Applications will be reviewed by an interagency team that includes the Division of Homeland Security and Emergency Management, Department of Local Affairs Division of Local Government, Colorado Water Conservation Board,

[4] See previous note on exclusion of private property.

Colorado Geological Survey, and the Division of Water Resources and one or more local representatives (i.e. CML, CCI, SDA). Weighted evaluation criteria include:

- Level of Community Priority
- Scope of damage to the community or threat of future damage related to the disaster (inputs include project worksheets, risk analyses, watershed master plans and other technical studies)
- Impact on the fiscal health of the community
- Impact on low-mod income populations (project applications will articulate the population that the project benefits, for example the use of GPS coordinates to identify demographic analysis)
- Readiness to implement project – project must be completed within 2 years of the award
- Partially funded projects will need to result in a benefit that is critical to the community recovery

National Objective

Benefit low- and moderate-income persons, Urgent Need, or Removal of Slum and Blight

COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY

INFRASTRUCTURE PROGRAM SCORING WORKSHEET

RATING FACTORS	SCORE
Does the proposed activity address one or more of HUD's national objectives (listed)? (up to 9 points total) 1. Does this meet an urgent community development need because existing conditions pose a serious and immediate threat to the health and welfare of the community where other financial resources are not available? (3 points if yes and description is satisfactory) **Describe how it meets HUD's objective:** 2. Does this aid in the prevention or elimination of slums or blight? (3 points if yes and description is satisfactory) **Describe how it meets HUD's objective**: 3. What percent of the community's low and moderate income population is directly benefitted by this? (3 points if >50%, 2 points for 30-50%, 1 points for 15-30%, 0 point for < 15%)	
Project Priority – If submitting multiple requests for funding, please rank the project submittals against one another. (up to 15 points) 15 points for the highest priority, 9 points if ranked 2nd, 4 points if ranked 3rd, 1 point if ranked 4th or lower	

Which of the following apply: 2 point for each "yes" answer. Specify which are claimed. (up to 10 points) • The community has adopted a national model building code (ICC, IBC, BOCA, etc.). • The community is a member of the FEMA Community Rating System (http://www.fema.gov/cis/CO.html). • The community has adopted "Rules and Regulations for Regulatory Floodplains in Colorado" as put forth by the Colorado Water Conservation Board; effective date 01/14/2011 • The applicant has a proven history of implementing mitigation measures. (List specific examples, could be structural or non-structural) • The local land use or comprehensive plan includes hazards and mitigation measures.	
Would this project provide economic/societal benefit to the local community? 1 point for each "yes" up to 3 points. Check all that apply. • Private sector (business / industry) • Access and Functional Needs Persons (NEPA – social justice, ADA, Civil Rights, etc.) • Nongovernmental organizations	
Determine the disaster impact to the community on a per capita basis. As time allows, take into account local government infrastructure costs directly related to the disaster (costs to the local government only-delete all costs already being reimbursed or expected to be covered by another source) and divide by the population of the community. Example: Direct costs to the local government are $1,000,000 and the population of the local government is 500,000. $1,000,000 / 500,000 are $2/person. 12 points if > $3.50/person, 6 points if $2/person to $3.49/person, 1 point if < $2/person	
Determine the impact on the fiscal health of the community. As time allows, take into account local government infrastructure costs directly related to the disaster, (costs to the local government only-delete all costs already being reimbursed or expected to be covered by another source), and determine what percent of the 2013 and 2014 local government budgets will be spent on direct costs. 15 points for > 50%, 10 points for 25%-50%, 5 points 25% - 10% 0 points <10%	
Does the proposed activity mitigate a *high*-risk hazard in the project's geographic area? 15 points if the risk is "eliminated", 7 points if the risk is "reduced", 0 points if "no" Examples: Eliminated risk – properties in the floodplain are acquired, demolished, and the properties are maintained as open space in perpetuity, Reduced risk – properties in the floodplain are flood-proofed	
Does the proposed project fit within the larger scope of a community master plan, comprehensive plan, land use plan, storm water master plan, hazard mitigation plan, or another local plan? 6 points if it satisfies the priorities of more than one plan, 3 points if it satisfies the priorities of a single plan, 0 points if it does not fit within the priorities of any local plan. **Specific plans must be identified in application*	

Does this proposal include a property or properties located in the floodway or floodplain; or not located in a regulatory floodplain but was substantially damaged or has a history of damage from at least two events? 5 points if "yes", 0 points if "no"	
How quickly can the community implement the project? 10 points if less than 6 months, 7 points if less than 1 year, 4 points if 1 year to 2 years, ineligible if longer than a 2 year timeline	
TOTAL SCORE	

Resiliency Visioning & Strategic Planning

The State of Colorado will support and facilitate the building blocks of community revitalization and economic stability by financially supporting long range planning needed to develop sound, strategic, innovative projects for future CDBG-DR funding. We are dedicating an initial amount of $1,000,000in the Action Plan to get these efforts underway. The State hopes to use a second allocation of CDBG-DR funds to facilitate planning and implementation of many resiliency projects.

It is essential the appropriate planning efforts take place to ensure sustainability and success of projects funded through the CDBG-DR allocation. The State hopes to lead a bold, long-range regional resiliency strategic planning process and to develop capital conservation projects focused on community connectivity trails, open space and park lands. This long-range resiliency planning effort will utilize comprehensive land use planning in watershed corridors and drainage systems and will capitalize funding opportunities to plan, design, and implement projects resulting in community connectivity, leveraging economic opportunity through healthy habitats, effective floodplain management, open space, trails, leading to stronger communities.

Planning grant assistance is available on a local basis for high-impact areas, to guide long-term recovery and redevelopment. The grants will fund activities including but not necessarily limited to visioning, comprehensive planning, and drafting zoning ordinances and land use codes.

Applications may be made on behalf of communities that had significant, localized damage and destruction that will require rebuilding. This is defined as at least 25 percent of the properties throughout the area exhibit substantial flood damage of buildings and improvements. Priority will be given to areas that can qualify with at least 51 percent LMI based on area benefit.

Allocation for Activity: $1,000,000

Maximum Award: $250,000

Eligible Applicants: Units of General Local Government

Eligibility Criteria: Communities that had significant, localized damage and destruction that will require rebuilding.

National Objective: Low-and-moderate income and Removal of Slum & Blight

Economic Revitalization Programs

The Economic Revitalization Programs will be administered by the Office of Economic Development and International Trade and the Colorado Department of Agriculture. The Colorado Small Business Development Center Network will assist in the initial consultation and in determining application eligibility and all applicants for grant and loan programs must be vetted through the SBDC. These programs will be targeted to provide assistance to small businesses, including operating expenses, as further defined, to aid them with their remaining economic unmet need.

The priority of the economic programs is to help businesses stay financially afloat in order to keep nourishing the local economy. The Colorado Department of Agriculture is also offering a grant program to the local ranchers and farmers who have sustained economic losses. This program is designed to help those affected keep their farms and ranches productive.

Non-profit or quasi-government entities based in the flood impacted counties which suffered a demonstrated loss of 30 percent or more of their revenues in their 2013 fiscal year and which directly drive private sector employment through their operations are eligible for the grant and loan programs and may qualify for up to $25,000 in grants if they impact multiple locations.

The Colorado Office of Economic Development and International Trade (OEDIT) will ensure that businesses within the three most impacted counties get a proportionate share of grant and loan resources, by managing the application process. No more than 20% of the dollar amount of the grant and loan programs can be obligated to counties outside of the three most impacted counties of Boulder, Larimer and Weld. Of the remaining 80%, each of the three most impacted counties will receive an allocation based on the proportional demand as indicated by SBA data. None of the counties will receive less than 10% of the allocation. Within these parameters, OEDIT will initiate a first round of grant and loan applications for a period of 45 days on a first in first out basis. Following this 45 day period, if one or more counties have not used their entire allocation, grant and loan resources will be available for those counties that were oversubscribed. Within each county, 50% of the resources must go towards creating or retaining low and moderate-income jobs. Also within each county, after 60% of the funds have been allocated for that county, OEDIT will do a review to ensure there is a reasonable geographic spread of grants and loans across flood-impacted areas within the county. Based on this review, OEDIT could deviate from the first in first out principle for the remaining 40% distribution of funds within the county to ensure a reasonable geographic spread of funds within the county.

Recover Colorado Business Grants Program

Colorado will offer grants up to $10,000 each to small businesses and non-profits (including special districts) that have suffered an economic loss due to the floods. Businesses that have sustained damage at multiple locations and have an unmet need of at least $100,000 may be eligible for a $25,000 award. The eligible uses for the funds Include but are not limited to costs for working capital, inventory, machinery, furnishings, equipment and payroll. Eligible businesses include those that are located within a declared disaster area per FEMA DR 4145.

The three most impacted counties of Boulder, Larimer, and Weld will receive priority in the disbursement of grants. These grants will be disbursed on a first come, first-served basis and 50 percent of the allocated funds will be used to assist low-and-moderate income businesses and individuals. Program policies and procedures will be enacted to ensure that 80 percent of these grants are to be allocated within Boulder, Larimer, and Weld counties and that the 50 percent to LMI is also properly accounted for.

Allocation for Activity: $5,000,000

Minimum Award: $5,000

Maximum Award: $10,000 single location up to $25,000 for multiple locations

Eligible Applicants: Small businesses and non-profits

Eligibility Criteria:

Businesses must have been in existence on September 12, 2013
Business has to be located within a disaster declared county per FEMA 4145-DR
Business is in good standing to do business in Colorado with the Secretary of State
Business must have at least $25,000 in annual revenue
Business must have less than $1 million in liquid assets
Business has to show indications of profitability before the floods occurred
Business must have applied for other forms of assistance and still have an unmet need of $10,000 or more.
Business must meet the definition of small business as defined by SBA at 13 CFR Part 121 http://www.sba.gov/content/table-small-business-size-standards

Selection Criteria: First-come, first-served with proper controls in place to ensure the 80 percent goes to the three most impacted counties

National Objective: Low-and-moderate income Jobs and urgent need.

Recover Colorado Business Loan Program

Colorado is giving applicants the ability to receive extra capital by offering low-cost loans to credit-worthy businesses. These low-cost loans are designed to provide additional aid to those that still have an unmet need after receiving other assistance including the Recover Colorado Business Grant Program. The State has allocated $4,000,000 of its CDBG-DR funds for loans. Applicants are eligible for up to $50,000 per business and during the first six to twelve months, applicants may have principal or interest payments and accruals waived.

Recover Colorado Business Loans must be used for CDBG-DR eligible uses only. These include but are not limited to working capital, inventory, supplies, furniture, fixtures, and equipment.. Eligible businesses include those that are located within a declared disaster area per FEMA 4145-DR. As stated in Federal Register Vol. 78, No. 43; page 14342; a revolving loan fund is allowed to support similar activities going forward. Program income that is generated from the Recover Colorado Business Loans

Program will go into an independent account separate from all other funds. These funds will be disbursed for similar loan programs (24 CFR 570.489 (e) (5) (3)). Program policies and procedures will be enacted to ensure that 80 percent of these grants are to be allocated within Boulder, Larimer, and Weld and at least 50% of loans benefit LMI populations.

Allocation for Activity: $4,000,000

Maximum Award: $50,000

Eligible Applicants: Small businesses and non-profits

Eligibility Criteria:

Businesses must have been in existence on September 12, 2013
Business has to be located within a disaster declared county per FEMA 4145-DR
Business is in good standing to do business in Colorado with the Secretary of State
If business is a home-based business must have at $25,000 in annual revenue
All other small business entities must have a minimum of $50,000 in annual revenue
Business must have less than 1 million in liquid assets
Business must positively impact the economy through capital investment or the creation or retention of jobs
Business has to show indications of profitability before the floods occurred
Business must have applied for other forms of assistance and still have an unmet need of $25,000 or more
Business must meet the definition of small business as defined by SBA at 13 CFR Part 121 http://www.sba.gov/content/table-small-business-size-standards

Selection Criteria: First-come, first-served with proper controls in place to ensure the 80 percent to three most impacted counties

National Objective: Low-and-moderate income and urgent need

Below are the Eligible Award Amounts for both the Grants and Loans based on the businesses unmet needs.

Table 26: Eligible Award Amounts

Eligible Award Amounts		
Unmet Need	**Grant Amount**	**Loan Amount**
$10,000 to $24,999	Up to $10,000	$0
$25,000 to $99,999	Up to $10,000	Up to $25,000
$100,000 and up	Up to $10,000	Up to $50,000
$100,000 and up and more that 1 impacted location	Up to $25,000	Up to $50,000

Agriculture Grant Program

To further assist those impacted in the agriculture sector, the Colorado Department of Agriculture (CDA) will offer grants to eligible applicants. These are farmers, ranchers, and producers that are registered and in good standing with the Secretary of State. The State has allocated $4,500,000 to assist those farmers and ranchers affected to help recover and revitalize Colorado's Agriculture industry. Per HUD requirements, 80 percent will be distributed to those within the three most affected counties, Boulder, Larimer, and Weld. The Colorado Department of Agriculture will ensure that businesses within the three most impacted counties get a proportionate share of grant and loan resources, by managing the application process. No more than 20% of the dollar amount of the grant and loan programs can be obligated to counties outside of the three most impacted counties of Boulder, Larimer and Weld. Of the remaining 80%, each of the three most impacted counties will have an initial allocation of one-third of the 80%. Within these parameters, CDA will initiate a first round of grant and loan applications for a period of 45 days on a first in first out basis. Following this 45 day period, if one or more counties have not used their entire allocation, grant and loan resources will be available for those counties that were oversubscribed. None of the counties will receive less than 10% of the allocation. Overall, 50% of the resources must benefit low and moderate income beneficiaries.

Allocation for Activity: $4,500,000

Minimum Award: $15,000

Maximum Award: $150,000

Eligible Applicants: Agricultural businesses in good standing with the Colorado Secretary of State (required for LLCs, corporations, limited partnerships, and cooperatives) OR an individual, sole proprietor or general partnership operating as a business under their own Social Security number.

Eligibility Criteria:

Businesses must have been in existence on September 12, 2013
Business has to be located within a disaster declared county per FEMA 4145-DR Map
Business must have at least $1,000 in annual revenue
Business had to have applied for other forms of assistance such as FSA or private insurance and still have a remaining unmet need.

National Objective: Low-and-moderate income and urgent need

Tourism Marketing *[ELIGIBILITY OF THIS PROGRAM IS PURSUANT TO APPROVAL OF A WAIVER FROM HUD]*

Tourism is the number one economic contributor to the State of Colorado, providing jobs, business revenue and taxes. A June 2013 report by the Colorado Tourism Office estimated that nearly 60 million visitors came to Colorado and left a $16.7 billion impact on the State. One of Colorado's most highly traveled attractions, Rocky Mountain National Park, and the nearby community of Estes Park, were directly in the path of the flood.

Of the $19.7 million in Small Business Administration Loans given to date, 16.25 percent were awarded to businesses with NAICS codes within the lodging and restaurant industries. These range from hotel, lodges, motels, full-service restaurants, limited-service restaurants, and specialty food shops.

The Marketing Grant Program will assist Non-profit and quasi-governmental entities to promote tourism and visitor-related jobs, job retention and/or economic impact in the Flood Designated Disaster Area as previously defined. These marketing promotional grant funds will be distributed to entities that have tourism and visitor related business communities in their jurisdictions that have suffered concentrated economic losses that have a large impact on the local economy relative to the size of the community. The tourism marketing program will ensure that business recovery efforts in the impacted area, many of which will be funded by CDBG-DR and other federal funds are adequately supported to make them successful and ensure a positive return on public investments.

The State has allocated $500,000 of the CDBG-DR funds for marketing to reestablish tourism in the affected area. Funds for the program may be used for advertising or marketing campaigns or for support of events and activities to drive tourists or visitors to come to impacted areas and support local economies.

Allocation for Activity: $500,000

Maximum Award: $150,000

Eligible Applicants: Non-profit and quasi –governmental entities.

Eligibility Criteria: Applicants who meet the unmet needs for Marketing/Tourism Dollars; and the unmet needs are related to the efforts toward stabilization or recovery of revenues, jobs or tax revenues specific to an impacted area of the declared flood disaster town or community. Entities may be considered for this program in lieu of the Recover Colorado Business Grant and Loan Programs, but may not be recipients of both.

National Objective: Low and Moderate Income and urgent need

Section 5: Program Administration

Citizen Participation

Citizen participation plays an essential role in the success of the State's recovery. The State's goal is to provide an opportunity for the communities to participate in an advisory role in the planning, implementation, and assessment of the programs and projects. The State commits to provide citizens with reasonable and timely access to local meetings, information, and records related to the proposed and actual use of funds.

Colorado developed a Citizen Participation Plan to meet the requirements of the CDBG Disaster Recovery funding following the floods of September 2013 and has submitted the plan to HUD. The plan reflects the alternative requirements as specified by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register (FR Vol78, No.241) and any amendments added as applicable. The State, through the Department of Local Affairs (DOLA) ensures the Citizen Participation Plan meets the CDBG-DR regulations and takes into consideration the waivers and alternatives made available by HUD.

The Citizen Participation Plan ensures citizens of the State of Colorado, particularly persons of low- and-moderate income residing in areas where it is proposed that such funds are proposed to be used, are provided the opportunity and encouraged to participate in the planning and review of proposed funded activities. The State expects to fund activities that address the needs of those persons and the larger communities in the three general categories of housing, infrastructure, and economic recovery.

State Outreach Plan

The State of Colorado will ensure all HUD requirements for citizen engagement are met and will conduct additional outreach efforts to all impacted stakeholders. The State initiated outreach through the following mechanisms: released an impacted community assessment survey tool, hosted webinars and in person meetings for data validation, and hosted bi-weekly phone calls with the Governor and all local elected officials to ensure feedback was consistent and continual. Additional stakeholder feedback is conducted through the State of Colorado Recovery Support Function (RSF) committee structure comprised of more than 15 local, state and federal Departments with an additional 300 stakeholders as well as the Local Long Term Recovery Committees and the Long Term Unmet Needs Committees in each impacted County. Regularly scheduled meetings and conference calls are conducted in continuation of the immediate disaster response process, ensuring continual communication between stakeholders at all levels of the recovery effort.

Public Notice and Comment Period

The State will provide public notice and seek feedback for the development of the Disaster Recovery Action Plan through emails, stakeholder conference calls, website postings, newspapers, and public meetings. The Action Plan was posted on the Department of Local Affairs website on February 10, 2014.

The Plan was available for comment until February 18, 2014. Additionally, the State held public meetings on February 11, 12, and 13 to gain additional feedback from the public.

Prior to finalizing the Disaster Recovery Action Plan, the State made available to stakeholders, citizens, public agencies and other interested parties information that included the amount of assistance the State expects to receive and the range of activities that may qualify for relief under the grant, including the estimated amount that will benefit persons of low to moderate income.

The State published notices in newspapers of general circulation and on the DOLA website http://dola.colorado.gov/cdbg-dr/ the availability of the draft Disaster Recovery Action Plan, the dates of the seven day public comment period, contact information for the written submission of comments and notice of public hearings. A copy of these notices is attached in the Appendices below. For those unable to otherwise obtain a copy of the draft Action Plan, a copy remains available at the Governor's office in the State Capitol, at each of the DOLA's regional field offices and the DOLA's Denver main office, and at each of the public meetings. The location information will be included in the public notice.

Citizens who wish to participate in the planning process are encouraged to contact either an organization that represents their interests or the DOLA field office serving their region.

While a public hearing is not required given the citizen participation waivers provided by HUD for CDBG-DR programs, the State held seven in person stakeholder consultation meetings and one webinar meeting to obtain the input from stakeholders of housing and community development, (including priority non-housing community development needs) and economic revitalization and infrastructure unmet needs before the Disaster Recovery Action Plan is published for comment. The State conducted stakeholder meetings from January 21-24, 2014 in Boulder, Larimer, and Weld Counties where we addressed the State's Action Plan. The State incorporated feedback and held additional stakeholder meetings from February 11-14, 2014.

The February public meetings allowed for open public comment by impacted members of the public in conjunction with the public comment period of the Draft Action Plan. We provided adequate public notice before the hearings, with sufficient information published about the subject of the hearing to permit informed comment.

The State will continue to hold all stakeholder meetings and public hearings in times and locations convenient to potential beneficiaries and accommodations will be made available for people with disabilities. During our most recent meetings, the State provided interpretation services for non-English speakers and hearing impaired. The meetings will be held in accessible locations and sign language interpreters will be made availableuponadvancedrequest.Stakeholdersandcitizenswillcontinue to be notified of the public hearings at least one week before they are held.

The Draft Action Plan and Action Plan were made available on the DOLA website in English and Spanish at http://dola.colorado.gov/cdbg-dr/. The website also has options through Google translate to translate the site into 100's of languages. IT staff developed the CDBG-DR website to comply with accessibility standards for state websites, allowing users to access content with assistive technology. All Colorado State Websites must be available to those that are blind, the website meets the Colorado State

standard. At Public Hearings Spanish interpreters were available to attendees. Sign Language interpreters were available at the Public Hearings. FEMA provided Communication Access Real Time Translation (CART) services at the Public Hearings.

The State of Colorado consulted with every Unit of Local Government through multilevel marketing outreach strategies, including public notice in local and statewide newspapers, biweekly phone calls with the Governor and chief elected officials, website placements, press releases as well as a phone tree to personally call, and face to face meetings with town, city and county managers and administrators via the Governor's Recovery Office, Office of Emergency Management and Division of Local Government's regional representatives, extensive outreach was implemented to ensure all eligible entities were clearly informed of the CDBG DR program, eligibility and criteria. To ensure a wide distribution, the State conducted an Unmet Needs survey which was sent to every unit of local government in all declared Counties, non profits, housing authorities, businesses, chambers of commerce, economic development organizations, industry trade associations and long term recovery groups. To best capture the most relevant information, the Division of Local Government contacted every Unit of Local Government via phone, the Division of Housing contacted all potential grantees and the Office of Economic Development, through their SBDC network contacted local businesses and associations. The State of Colorado, through the Governor's Recovery Office, hosted 4 stakeholder meetings for local jurisdiction leaders in Boulder, Larimer and Weld counties with an additional webinar format for all declared counties. The State also hosted four additional public meetings to address a larger audience to ensure the citizens of Colorado were equally apprised of the process and opportunities.

Amendments to Action Plan

The State will require public notification and comment procedures if any of the following Substantial Amendments are proposed:

- A change in program benefit, eligibility criteria, or planned beneficiaries;
- The allocation or re-allocation of more than $1 million; or
- The addition or deletion of any allowable activity described in the approved application.

The State will publish in a newspaper of general circulation the availability of the draft amendment and the dates of the seven day public comment period. A copy of the amendment will be available at each of the DOLA regional field offices, and the DOLA Denver main office. Written comments may be submitted to DOLA via email at DOLA_recovery@state.co.us or to DOLA Flood 2013 Recovery CDBG-DR, 1313ShermanSt.5thfloor, Denver, Co80203. All submitted comments will be included as an attachment to the final Substantial Amendment.

For other non-substantial amendments, the State shall notify HUD, but public comment is not required. Every amendment, substantial or not, shall be numbered sequentially and posted on the DOLA website, not replacing, but in addition to all previous versions of the plan.

The State must submit a Quarterly Performance Report (QPR) through HUD's Disaster Recovery Grant Reporting (DRGR) system no later than thirty (30) days following the end of each calendar quarter. Within three (3) days of submission to HUD, each QPR must be posted on the DOLA website

http://dola.colorado.gov/cdbg-dr/ for public review and comment, where it shall remain through the grant period. The State's first QPR is due thirty (30) days after the first full calendar quarter after the grant contract is signed by HUD. QPRs will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported, through the grant period. Following completion of all the aforementioned activities, DOLA will confer with HUD, as required, to determine the CDBG-DR grant is ready to be closed out, and with HUD's agreement, will submit and make publicly available its final QPR.

Each QPR will include information about the uses of funds in activities identified in the Action Plan as entered in the DRGR reporting system. This includes, but is not limited to: project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total amount of any non-CDBG-DR funds(match/leverage) to be expended separately on each activity; beginning and actual completion dates of completed activities; achieved performance outcomes such as number and addresses of housing units complete or number of low and moderate income persons benefiting; and the race and ethnicity of persons assisted under direct-benefit activities. The State must also record the amount of funding expended for each Sub-recipient or Sub-grantee identified in the Action Plan. Efforts made by the State to affirmatively further fair housing will also be included in the QPR, along with public outreach efforts.

During the term of the grant, the State will provide citizens, affected local governments, and other interested parties with reasonable and timely access to information and records relating to the approved program and to the program's use of grant funds as well as contracts procured with CDBG-DR funding. This information shall be posted on the DOLA website http://dola.colorado.gov/cdbg-dr/ and provided on request.

Complaint Process and Procedures

The State will have written citizen and administrative complaint procedures. The procedure may be posted on the DOLA website http://dola.colorado.gov/cdbg-dr/ or must provide citizens with the information relative to the location and hours at which they may obtain a copy of these written procedures.

Persons wishing to object to approval of a CDBG-DR program may make such objectionknowntotheStateinwritingtoDOLA.TheStatewillconsiderobjections made only on the following rounds:

- The applicant's description of needs and objectives is plainly inconsistent with available facts and data;
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; and
- The program does not comply with the requirements set forth in the Disaster Recovery Action Plan or other applicable laws.

Such objections should include identification of the requirements not met and supporting data.

The State will respond to comments, complaints and grievances in a timely manner. Responses will be made in writing and may be responded to via email if applicable. When practicable, such responses shall be made within fifteen working days and be included in the final Disaster Recovery Action Plan. Please address your comments, complaints, or grievances to:

Via Website: http://dola.colorado.gov/cdbg-dr/

Via Email: DOLA_recovery@state.co.us

Via Mail:

Colorado Department of Local Affairs, Flood 2013 Recovery CDBG-DR
1313 Sherman Street, 5th Floor
Denver, Colorado 80203

Close-Out Process

The State will make all performance reports available to the public on its website throughout the grant period.

Prior to close-out of the CDBG-DR, the State will host a public hearing to obtain citizen feedback and to respond to questions relative to the State's performance. This hearing shall be held after adequate notice, at times and locations convenient to actual beneficiaries and with accommodations for the disabled and non-English speaking persons provided. The draft QPR will be made available on the DOLA Website http://dola.colorado.gov/cdbg-dr/ for public review and comment prior to the hearings, and prior to final submission to HUD.

Public Participation Process

The Governor's Recovery Office along with its partners hosted the below stakeholder meetings to review and determine the action plan for the allocation of funds. These meetings focused on unmet needs, with an open discussion and Q & A. Business owners were encouraged to attend to assist in prioritizing unmet needs and fund allocations for the disaster recovery grant and loan program.

Boulder County: January 21, 2014 6-9pm
Boulder Recycling Center
1901 63rd Street
Boulder, CO

Larimer County: January 22, 2014 6-9pm
Larimer County Courthouse- Hearing Room
200 Oak
Fort Collins, CO

Weld County: January 23, 2014 6-9pm
Weld County Administrative Building- Events Room
1150 "O" Street
Greely, CO

Webinar: January 24, 2014 8-11am. For other counties or for those who could not attend their local meeting.

El Paso County: February 11, 4:30-6pm
Manitou Springs Memorial Hall
606 Manitou Ave.
Manitou Springs, CO 80829

Larimer County: February 12, Noon-2pm
Estes Park Town Hall, Board Chambers
170 MacGregor Ave.
Estes Park, 80517

Boulder County: February 12, 7-9pm
County Clerk & Recorder Office, Houston Room
1750 33rd Street
Boulder, CO 80301

Weld County: February 13, 6-9pm
Evans City Hall, Cottonwood Banquet Room
1100 37th Street
Evans, CO 80620

Program Income

The State anticipates generating program income for housing and economic development-related activities. Additionally, funds loaned to Sub-grantees will generate program income to the State. The State will use the program income for other disaster related activities as allowed in Federal Register Vol. 78, No. 43; page 14342. Unless otherwise specified in the grant or loan agreement, the Sub-recipient will retain possession of the program income generated and keep the monies in an independent interest-bearing account separate from all other funds. The Division of Housing will track program income for housing programs and the Governor's Office of Economic Development and International Trade in DRGR and will follow the CDBG-DR Program Income guidelines. The contract with all Sub-recipients and Sub-grantees and the reimbursement requests will require that all program income be deducted

from the net reimbursement request. The State will follow standards similar to the State's Division of Housing NSP Program Income guidelines.

Monitoring Standards and Procedures

The Department of Local Affairs Accounting and Financial Services unit will ensure that anti-fraud communications--brochures and posters-- are distributed and prominently displayed throughout the department and regional offices. The communications will include a fraud tip line to the State Auditor's Office. Contracts with Sub-grantees will require any fraud, waste or abuse be immediately reported to DOLA.

The Governor's office will oversee the State's performance with DOLA serving as the administrative and fiscal agent. DOLA will use its long standing procedures on audit oversight and conflicts of interest. DOLA will also provide technical assistance from administrative organizations that have administrative capacity to any Sub-grantees.

Verification of non-duplication of benefits will be part of all program procedures including procedures for additional funds received by applicants (i.e. segregation policies). At a minimum, the State will require that all CDBG-DR applicants submit documentation supporting their funding request and certify that all reported information is complete and accurate. For larger project applications (e.g. infrastructure, new construction) requiring State staff review, State underwriters will work closely with applicants to review project budgets, financial projections, and other supporting documentation; conduct preliminary site visits; and complete other tasks to fully vet the application and ensure that CDBG-DR funds are responsibly awarded to projects that are necessary and feasible.

The State conducts monitoring in a number of ways throughout the term of a contract. Desk monitoring, which includes review of financial and Project Performance Plan (PPP) reports, supporting documentation and recipient and Sub-recipient certifications, occurs on an on-going basis during the term of a contract. A full on-site monitoring including a site visit and inspections (if applicable), file review, and administrative review will occur at least once for every contract, and more frequently for higher risk awards or to monitor specific requirements, such as Davis Bacon. Additionally, long-term monitoring and reporting will be required to ensure no duplication of benefits occurred and that any long-term affordability requirements are met.

Desk monitoring will occur at least monthly for every contract. On-site monitoring will occur at least annually during the term of the contract, or as often as quarterly for high risk or troubled projects. Long term monitoring will occur annually. The State monitors its recipients and Sub-recipients via monthly performance, financial, and beneficiary reports. Requests for payment are reviewed prior to disbursement of funds to verify the payment is documented as eligible. On-site monitoring includes a review of the recipient or Sub-recipient's administration to ensure all federal and State requirements were met, including program-specific and cross cutting requirements (e.g. Davis Bacon, Section 3); a file review to confirm all beneficiaries of funds were documented as eligible; and a site visit and inspections to determine that any construction or rehabilitation adhered to the required standards.

Reporting for Public Purposes

Each CDBG-DR project will be tracked in the State's Oracle database as well as the Federal Disaster Recovery Grant Reporting (DRGR) System. The DRGR reporting system will be configured to capture performance measures, anomalies, performance problems, budgets, obligations, fund draws, expenditures, administration costs, and the overall benefits to achieve the national objectives of benefitting low and moderate income families, preventing and eliminating slums and blight, and meeting urgent needs in the disaster-impacted areas.

Pre-Agreement Costs

Colorado 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, Sub-grantees or Sub-recipients (including public housing authorities) on or after the incident date of the covered disaster. Pre-award costs will be considered for reimbursement with CDBG-DR funds based on the programs outlined in this Action Plan. To be eligible, the funding pre-award must meet all federal requirements of the CDBG-DR funding and cross-cutting regulations.

Timely Expenditures

The Office of Economic Development and International Trade along with The Department of Local Affairs, the Office of Emergency Management and the Department of Agriculture will be accountable for following HUD guidelines as well as the guidelines they set for each individual CDBG-DR program to ensure that the funds are disbursed in the allotted time. Colorado will disburse all CDBG-DR funds within two years from the date the grant agreement is signed by HUD, per the Federal Register Vol.78, No. 43; pg. 14331. The Housing, Infrastructure, and Economic Development categories are all diligently utilizing current internal resources to ensure the adequate and timely disbursement of all the CDBG-DR funds. The Housing sector uses existing service provider networks and Infrastructure uses funding shovel-ready projects to make the process speedier. The Colorado Department of Agriculture is also using an existing network of site inspectors. Current personnel as well as other newly trained people will provide assistance to the State by monitoring program requirements and existing checklists to keep on tract with their goals. The Units of General Local Government (UGLGs) will monitor the percentage of grants awarded on an ongoing basis. By complying with this set of controls, the affected communities; households; and businesses will receive their awards within the two year disbursement threshold.

The State will determine and ensure that CDBG-DR funds will be spent in a timely manner at all stages of the award process. The application will be required to demonstrate applicant capacity to complete the project on time, readiness to proceed, and that other funding sources are committed. The award letter will include timely expenditure of funds as a condition of the award. The contract will include a budget and payment schedule, performance measures and associated timelines, and penalties for non-compliance. Contracts will require that monthly progress and financial reports be submitted to the State, reporting on performance and expenditures.

Monthly review and tracking of expenditures is completed via review of monthly grantee reports, including financial status reports, project performance plans, and requests for payment of grant or program income funds. Quarterly reports to HUD submitted in DRGR ensure ongoing review through

the end of the period of availability. The State program managers will use independent databases to record and track monthly expenditures, receipts, and progress toward the budgeted goals for each contract, and for the grant as a whole. The program manager's spreadsheet is compared against drawdown records in the independently managed accounting system, and against quarterly reports in DRGR to ensure accuracy each month, each quarter, and throughout the term of the grant.

DOLA monitors the expenditures of its recipients through desk and on-site monitoring. Extensive desk monitoring is conducted monthly by the contract managers though review and approval of monthly project performance reports, financial status reports, and documented requests for reimbursement throughout the contract period. Beginning shortly after commencement of contracted activities, risk-based on-site monitoring will occur as appropriate to contracted activities and award amounts. At least one on-site monitoring visit will occur prior to project completion, to verify funds were expended appropriately.

Upon full obligation of CDBG-DR funds, the State will maintain a prioritized queue of eligible projects to be assisted if funds are recaptured or additional funds are received. Following review of potential projects, the State will maintain prioritized project lists by eligible category (housing, infrastructure, economic development) and jurisdiction. Upon reprogramming funds, the State will attempt to award funds to projects within the same category and jurisdiction in which the reprogrammed funds were originally awarded. At a minimum, the State will ensure the three most impacted counties receive 80 percent of the total CDBG-DR allocation, as required.

The application for funding, project review, and contract will include a projected schedule of expenditures. Additionally, recipients will be required to submit monthly reports that project the following month's expenditures.

Procedures to Detect & Prevent Fraud

For activities that the State administers directly or through sub-grantees, staff in the applicable State agency as shown in the organizational diagram on page 48 will follow the procedures outlined in the State's Financial Controls documentation for a) activities prior to receiving assistance, b) upon completion of activities for which funds were rewarded, and c) one year after completion of activities for which funds were rewarded. For activities carried out by sub-recipients, the designated administrator of the activity will be contractually required to complete this procedure and submit documentation for review before the responsible State agency will release payment.

The State has worked with HUD, FEMA, SBA and other federal agencies to identify and catalog available sources of federal assistance for disaster recovery. As outlined in the Financial Controls documents, the State will require that all sources (Federal, State, local, private) and amounts of disaster assistance received or reasonably anticipated are disclosed with submission of an application for CDBG-DR funding. Additionally, applicants will be asked to reference information on the sources and amounts of potentially duplicative assistance, e.g. FEMA registration number, SBA application number, etc. In addition, the applicant will be asked to certify the information is correct. When possible, the State or subrecipient will verify the reported information with a 3rd party.

The State, and specifically the Department of Local Affairs, will rely on its extensive experience with its annual competitive CDBG grant process to vet applicants' unmet needs in consideration of an application. Depending on the program, the State or sub-recipient will determine an applicant's unmet need before awarding assistance by identifying total need, identifying other sources of funding received or reasonably anticipated, and deducting assistance determined to be duplicative. This calculation will yield the maximum potential CDBG-DR award.

All CDBG grant and loan programs will contain guidance on Duplication of Benefits within their program procedures in accordance with FR-5582-N-01 that include recipients completing a Duplication of Benefits Affidavit and a subrogation agreement for future awards. The responsible personnel will vary by project type. For activities that the State carries out directly or through sub-grantees, State staff who typically underwrite applications will complete the calculation to determine the maximum eligible award and ensure no duplication of benefits occurs, and State contract managers will follow-up with recipients after project completion. For activities carried out by sub-recipients, the sub-recipient program administrators will collect documentation and complete the unmet need calculation, and the required follow-up. State contract managers will review documentation submitted by the program administrators prior to release of funds, and will verify that follow-up occurs.

Conflict of Interest Policy

As outlined in the State's Financial Controls documentation, sub-grantees and sub-recipients shall not engage in any business or personal activities or practices or maintain any relationships which conflict in any way with the full performance of an applicant's obligations. Absent the State's prior written approval, sub-grantees and sub-recipients shall refrain from any practices, activities or relationships that reasonably appear to be in conflict with the full performance of sub-grantee's and sub-recipient's obligations to the State. If a conflict or appearance exists, or if is uncertain whether a conflict or the appearance of a conflict of interest exists, the sub-grantees and sub-recipients shall submit to the State a disclosure statement setting forth the relevant details for the State's consideration. Failure to promptly submit a disclosure statement or to follow the State's direction in regard to the apparent conflict constitutes a breach of an agreement with the State.

Appendices

Grantee Certifications

a) The grantee certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within its jurisdiction and take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard (see 24 CFR 570.487(b)(2) and 570.601(a)(2)). In addition, the grantee certifies that agreements with Subrecipients will meet all civil rights related requirements pursuant to 24 CFR 570.503(b)(5).

b) The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.

c) The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

d) The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice.

e) The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.

f) The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.

g) The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

h) The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each UGLG receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).

i) Each State receiving a direct award under this Notice certifies that it has consulted with affected UGLGs in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.

j) The grantee certifies that it is complying with each of the following criteria:

Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in the aftermath of Hurricane Sandy, pursuant to the Stafford Act.

With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 50 percent of the grant amount is expended for activities that benefit such persons.

The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

k) The grantee certifies that it (and any Subrecipient or recipient) will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations.

l) The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:

A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

m)Each State or UGLG receiving a direct award under this Notice certifies that it (and any sub-recipient or recipient) has the capacity to carry out disaster recovery activities in a timely manner; or the State or UGLG will develop a plan to increase capacity where such capacity is lacking.

n) The grantee will not use grant funds for any activity in an area delineated as a special flood hazard area or equivalent in FEMA's most recent and current data source unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the latest issued FEMA data or

guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

o) The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

p) The grantee certifies that it will comply with applicable laws.

q) The grantee certifies that it has reviewed the requirements of this Notice and requirements of Public Law 113-2 applicable to funds allocated by this Notice, and that it has in place proficient financial controls and procurement processes and has established adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, to maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, and to detect and prevent waste, fraud, and abuse of funds.

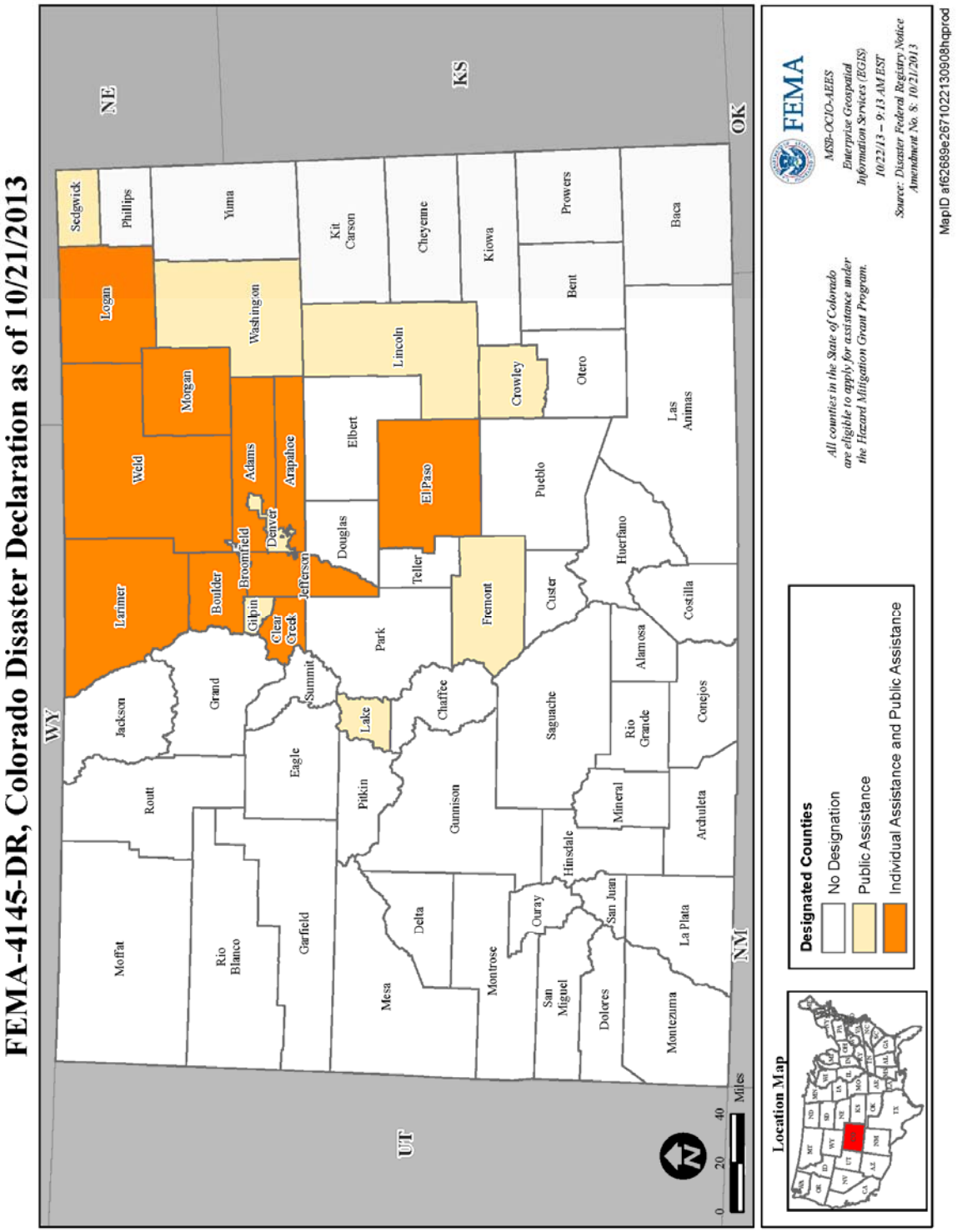
_____ _____

Signature of Authorized Official Date

First Name, Last Name, Commissioner

Department of Local Affairs

FEMA – 4145 – Eligible Counties



SBA Loans by NAICS Code

NAICS CODE	# OF LOANS	AMOUNT OF LOANS
115310 Tree Service	1	$24,100.00
236220 Commercial General Contractor	1	$232,200.00
238210 Electrical Contractor	1	$5,000.00
238990 Home Improvements Security System Sales Welding Fabrication Welding Service And Repair	4	$173,500.00
312111 Beverage Manufacturer	1	$26,200.00
326199 Plastic Injection Molding	1	$431,700.00
332510 Cabinet Manufacturing	1	$290,200.00
333241 Bar And Restaurant	1	$102,200.00
339116 Dental Lab	1	$4,700.00
423520 Wholesale	1	$10,900.00
423990 Manufacturer	1	$12,500.00
424310 Promotional Products	1	$26,900.00
424330 Retail/Wholesale	1	$89,500.00
424950 Painting And Metal Coatings	1	$95,000.00
441120 Storage Facility	1	$162,500.00
442110 Retail Home Furnishings Retail Sales	2	$16,400.00
442299 Retail Retail - Home Decor	2	$164,000.00
444220 Retail Garden Center Retail Seller Of Farm Supplies	2	$309,200.00
445291 Cookies	1	$30,000.00
531130 Storage	1	$296,800.00
531190 Rental Properties	1	$118,800.00
531210 Real Estate Sales	1	$110,300.00
531311 Condo Association Property Management	2	$193,200.00
531320 Appraisals	1	$5,000.00
533110 Rental Property	1	$7,500.00
541211 Certified Public Accountant	1	$15,500.00
541213 Accounting	1	$3,100.00
541430 Graphic Design And Marketing Silkscreen / Graphics	2	$23,900.00
541618 Electrical / Technical Svcs	1	$8,900.00
541712 Research Engineering Research/Forest Management	2	$29,900.00
541810 Guide Book Publications	1	$81,700.00
541921 Photographer	1	$3,000.00
541940 Veterinary	1	$92,300.00
541990 Civil Engineering Retail Supplements For Animals	2	$35,900.00
561730 Landscape Maintenance Landscape Maintenance, Develop Tree Service Tree Service And Saw Mill	4	$198,800.00
611610 Education	1	$44,400.00
621111 Medical Office	1	$94,700.00
621112	1	$44,100.00

445292	1	$9,300.00
Retail Store And Confectioner		
445299	1	$214,700.00
Specialty Food Store		
445310	1	$53,400.00
Liquor/Retail		
447110	1	$33,900.00
Convenience Store		
448150	1	$70,500.00
Retail Store/Boutique		
448190	2	$90,400.00
Embroidery		
Retail		
448310	1	$79,700.00
Retail		
452990	2	$322,800.00
Florist		
Retail Store		
453220	5	$388,700.00
Gifts Retail		
Jewelry Designs		
Retail		
Retail Shop And Coffee		
Retail Store		
453310	1	$5,000.00
Resale		
453910	2	$55,900.00
Retail		
Retail Pet Store		
453920	1	$18,700.00
Art Gallery		
453998	1	$136,500.00
Auction		
454111	1	$5,000.00
Women's Consignment And Gift		
454113	1	$112,700.00
Promotional Products		
454210	1	$16,600.00
Vending		
454390	2	$5,600.00
Dairy Products Sales/ Delivery		
Relationship Coach		
484110	1	$50,000.00
Trucking		
517110	1	$17,300.00
Internet/Cable Provider		
522310	1	$48,700.00
Mortgage Broker		
531110	155	$5,140,500.00
Physician		
621210	2	$49,500.00
Dental Office		
621310	2	$145,800.00
Chiropractic Office		
Health Care Provider		
621330	3	$41,800.00
Counseling And Therapy Center		
Psychotherapy		
Psychotherapist		
621399	1	$11,600.00
Healthcare		
621610	2	$30,200.00
Certified Nurse Aid		
Physical Therapist		
624120	1	$41,000.00
Aid For Disabled And Elderly		
624410	3	$204,800.00
Child Care		
Childcare		
Preschool		
711190	1	$900.00
Programs/Presentations/Parties		
711510	2	$104,900.00
Artist Studio		
Chainsaw Art		
713910	1	$415,400.00
Golf Course And Driving Range		
713940	1	$292,400.00
Health And Fitness Club		
713990	2	$79,900.00
Horseback Riding / Trail Rides		
Paragliding School /Gear Sales		
721110	10	$1,235,800.00
Hotel		
Lodge		
Lodging		
Lodging And Events		
Lodging/Hospitality		
Motel		
Short-Term Accommodations		
Vacation Rental		
721191	4	$239,200.00
Bed And Breakfast		
Bed And Breakfast Inn		
Cabin Rentals		
Lodging, Bed And Breakfast		
721199	2	$166,400.00
Lodge / Cottages		

Commercial Rental		
Executive		
Home Rental		
Hospitality-Rental Cabins		
House Rental		
Investment Rental Real Estate		
Landlord For Rental Property		
Lodging		
Mobile Home Park		
Owner Of Rental Home		
Property Owner		
Property Restoration And Lease		
Real Estate		
Real Estate / Investment Prop		
Real Estate Rental		
Real Estate Rentals		
Rental		
Rental Business		
Rental Cabins		
Rental Home		
Rental Homes		
Rental Of Cabins And Fishing		
Rental Property		
Rental Properties		
Rental Property		
Rental Property		
Rental Units		
Rentals		
Residential Rental		
Residential Rental		
Residential Rental Property		
Residential Rentals		
Resort / Cottage Rental		
Single Family Rental Home		
Sole Proprietorship		
Vacation Home		
Vacation Rental		
531120	11	$1,626,500.00
Brown Rental		
Commercial Investment Property		
Commercial Real Estate		
Commercial Rental		
Day Care		
Office Bldg. Rental		
Real Estate Rental		
Rental Property		
Rental Property - Preschool		
Restaurant And Theater		

Lodging		
721211	2	$505,500.00
Outdoor Programs For Youth		
RV Park And Campground		
721310	2	$96,300.00
Horse Boarding		
Hotel & Cabins		
722410	2	$151,100.00
Bar And Grill		
Restaurant		
722511	11	$1,260,800.00
Full Service Restaurant & Bar		
Lodging		
Mexican Restaurant		
Restaurant		
Restaurant & Catering Company		
Restaurant		
722513	3	$83,200.00
Coffee Shop/Cafe		
Pizza Delivery		
Restaurant		
722515	1	$78,500.00
Coffee Shop		
811111	2	$84,300.00
Auto Repair		
Automotive Repair		
812112	1	$2,000.00
Hair Salon		
812199	1	$7,700.00
Massage Therapist		
812910	1	$5,000.00
Dog Boarding\Daycare\Training		
812990	1	$10,000.00
Wedding Planning		
813110	5	$430,400.00
Church		
813410	1	$75,000.00
Veterans Hall		
813990	16	$1,821,000.00
Condo Association		
Condo Association		
Condominium Association		
Education		
HOA		
Home Owner Association		
Homeowners Association		
Non-Profit Road Association		
Grand Total	331	$19,787,300.00

DOLA, Division of Local Government – Community Development Office
Long Term Flood Recovery Planning Meetings

DLG FLOOD RECOVERY COORDINATION MEETINGS

Field Services Conference Call
Weekly on Tuesdays from 7:30-8:30am (since October 2013)

Field Services/OEM Conference Call
Bi-weekly on Wednesdays from 8:00-9:00am (since December 2013)

DOLA Coordination Meeting (DOH, DLG)
Weekly on Thursdays at 8:30am (since October, as needed)

FEDERAL/STATE COORDINATION MEETINGS

FEMA Community Planning & Capacity Building RSF
Weekly on Tuesdays at 1pm (since November)

Federal & State Disaster Recovery Coordination Meetings (FDRC/SDRC)
Weekly on Thursdays from 10:30am-12:00pm (since November)

Recovery Coordination Cell Meetings (federal and state agencies)
Weekly on Mondays from 1:00-3:00pm (since November, meeting times adjusted over time)

BOULDER COUNTY

Long Term Recovery monthly meetings with the Community Resilience and Engagement Planning Group, beginning Feb. 5, 11, 25, March 4. Weekly meetings held Tuesdays moving forward.

Community Resiliency and Engagement kick-off with stakeholders group (planned and facilitated small groups), March 13

JAMESTOWN

Initial long term recovery planning outreach meeting, Oct. 17, 2013
Follow-up meetings with OEM and/or CPCB, including several community meetings and hearings, Nov. 13, 14, 19, 26, Dec. 2, 3, 9, 16, 18, 19, 23, 30, Jan. 6, 13, 14, 16, 17, 20, 21, plus small subcommittee working meetings

Planning Committee weekly on Mondays 10am-12pm from Dec. 2013 through Jan. 2014 *(included pro bono assistance from APA Colorado, ULI Colorado, Colorado Bar Association)*

Community Meetings/Board of Trustee Meetings weekly on Tuesdays 5:30 pm (since November 2013, DOLA participation as needed). See follow-up meetings above for more dates.

Miscellaneous topical/**subcommittee meetings** (land use, legal, etc.) as needed (mostly November 2013 through end of January 2014)

Planning meetings to develop comprehensive and mitigation plan update: March 13, 18, 20 and projected weekly for the next six months

LYONS

Initial long term recovery planning outreach meeting with OEM, FEMA CPCB, October 30, 2013
Pre-LTR planning launch meetings: Nov. 4, 7, Dec. 2, Dec. 10, Dec. 11, Dec. 12, 17
Community kick-off, December 18, 19 (de-brief)
Implementation/start-up of long term recovery planning process meetings: Jan. 6, 14, 15, 17

RECOVERY WORK GROUP (RWG) MEETINGS

Housing RWG Meeting ***(DOH working with DLG and advising in meetings)***
Tuesday, Jan. 21; Thursdays, Jan. 30, Feb. 6, 13, 27
7:00pm – 9:00pm

Economic & Business RWG Meeting ***(DLG Facilitating)***
Wednesdays, Jan. 22, 29, Feb. 5, 12, 26
5:30pm – 7:30pm; Lyons Town Hall (432 5th Ave, Lyons)

Arts/Culture/Historic Preservation RWG Meeting ***(DLG Facilitating)***
Monday, Jan. 20; Wednesdays, Jan. 29, Feb. 5, 12, 26
7:00pm – 9:00pm; Lyons Town Hall (432 5th Ave, Lyons)

Parks & Recreation RWG Meeting ***(DLG Facilitating)***
Wednesday, Jan. 22, 2014; Mondays, Jan. 27. Feb 3, 10, 24, March 3

RECOVERY ADVISORY COMMITTEE MEETINGS
Every Wednesday since Jan. 22, 2014

RECOVERY STEERING COMMITTEE MEETINGS
Week of Feb. 3, 17 & March 12, 19

RECOVERY PUBLIC MEETING AND HEARING
Week of Feb. 19, March 17, 31 (scheduled final adoption)

Follow-up and next-steps planning meetings to begin in April.

WELD COUNTY

Initial long term recovery outreach meeting, Nov. 14, 2013. No additional assistance requested.

Milliken

Initial long term recovery planning outreach meeting with OEM and CPCB, November 13, 0213
Community in early stages of planning community kick-off, supported by DLG Regional Manager

EL PASO COUNTY

MANITOU SPRINGS
Initial long term recovery outreach meeting with OEM, FEMA CPCB, March 21

LARIMER COUNTY

Initial long term recovery planning outreach meeting with OEM, Jan. 8, 2014
Follow-up planning team/staff meetings: Feb. 27, March 26

CAPACITY BUILDING TRAINING

Community Long Term Recovery Symposium for Flood Affected Communities
Nov. 22, 2013 (major day-long training event utilizing significant state and federal resources)
Included approximately 20 meetings with several partners to plan the symposium.
Additional workshops are planned, including a funding workshop scheduled for April 21, and a community engagement workshop/webinar, also in April.

Additional outreach and support meetings:
University Colorado Denver, Oct. 1, 2013 (with FEMA CPCB) (ongoing partner meetings)
EDA/SBDC Business and Economic Development Recovery Roundtables, Nov. 20, Dec. 18, 2013
Colorado Nonprofit Association, March 3, 2014

Additional note: Regional managers are assigned to support, immediately after the event: Larimer, Weld, Boulder Morgan, Logan, Sedgwick, El Paso Counties, Estes Park, Loveland, Evans, Milliken, Jamestown, Lyons, Longmont, Manitou Springs and other communities. This assignment includes frequent or regular check-in meetings, subcommittee/working group meetings, and one on one meetings with local government elected leaders and manager/administrators to support their recovery efforts.

Response to Public Comment

1. Public Comments Received

Comment:
There were over 30 different comments received regarding the Little Thompson Watershed Restoration Coalition and the Big Elk Meadows community for both housing and infrastructure. The flooding of the Little Thompson River caused significant damage to both private and public roads and bridges. The flooding caused there to be no access from Big Elk Meadows to the town of Milliken. Many dams were destroyed causing much of the water supply in the community to be contaminated. The Little Thompson River runs through all three of the most impacted counties: Larimer, Boulder and Weld. There are still significant amounts of debris in the river that could cause future damage to both the citizens and properties if they do not receive funding through the CDBG-DR funds. The community of The Little Thompson Watershed would also like more information on applying for a grant and how and who they can contact for further information.

Response:
Although 80% of the funds must be spent in Boulder, Larimer, and Weld counties, the repair of private roads and bridges that access secondary homes is not an eligible use of CDBG-DR funds without a waiver from HUD. The State of Colorado is seeking a waiver to repair private roads and bridges, including those that serve communities with both primary and secondary residences. The State is also seeking a waiver to use CDBG-DR funds for debris removal on private property. Other public improvements may be eligible under the Infrastructure program.

Comment:
One comment was from a property owner in Boulder County that would like to see some of the CDBG-DR funds spent on the repair and rebuilding of private roads and bridges for secondary and/or vacation cabins.

Response:
A repair to private roads and bridges that access secondary homes is not an eligible use of CDBG-DR funds absent a waiver. The State of Colorado is seeking a waiver to repair private roads and bridges that service primary and secondary residences.

Comment:
One commenter requested that funds be used to help clean up destroyed trailer parks and houses in the Town of Lyons. The commenter is concerned that the destroyed structures will cause health issues if not addressed in a timely manner.

Response:

The State of Colorado is aware that there is a need for clearance and demolition of destroyed properties. The State has created programs to address this need. One is the Clearance and Demolition program that will help address the removal of blighted structures. Another program is the Infrastructure program, through which units of local government may apply to the State for debris removal.

Comment:
One commenter requested that the Community Development Block Grants prioritize those that have the most need and asked that the community of Evans be prioritized because they have urgent needs and fewer resources to obtain monies from other sources.

Response:
80% of the CDBG-DR funds must be spent in Boulder, Larimer, and Weld counties. Evans is located within Weld County. Evans would be an eligible applicant under many of the programs created by the State to address their needs.

Comment:
One commenter requested that CDBG-DR dollars be spent in ways that benefit the public and not the private citizen.

Response:
Infrastructure restoration on private property is not usually an eligible activity of CDBG-DR funds. However, there are a number of health and safety issues associated with failing to assist infrastructure needs, such as debris removal in waterways that might be on private land. The State is trying to be fair in regards to those private land owners with this particular problem in order to keep all of Colorado's citizens safe.

Comment:
Three commenters requested that the State of Colorado allocate some CDBG-DR funds to assist in flood mitigation.

Response:
The State has designed infrastructure programs that may be used for flood mitigation activities. Units of local governments can apply for these funds to receive assistance for this need.

Comment:
A commenter from the Town of Estes Park asked that the two year requirement for expending funds be extended and requests that the application process be as simple as possible.

Response:

The State of Colorado will work to make the application process smooth for its applicants. However, it is a requirement of HUD that all funds be expended within two years from signing the grant agreement.

Comment:
Fifteen different commenters urged the State to ask HUD for a waiver in order to address the decline on Colorado's tourism.

Response:
Marketing for tourism is not an eligible use of CDBG-DR funds absent a waiver. The State of Colorado has requested a waiver in order to use funds for this need.

Comment:
One commenter requested a better explanation of how the monies will be allocated to the remaining 20% that is not set-aside for the three most impacted counties.

Response:
Per HUD requirements, at least 80% of the funds must be allocated to the three most impacted counties, which are Boulder, Larimer, and Weld. Entities in the remaining counties in the DR 4145 declaration area are eligible to apply for the State programs in accordance with the priorities and threshold criteria for each program.

Comment:
A commenter requested that funds be available to ranchers and farmers.

Response:
The State created an Agricultural Grant Program to address these very applicants.

Comment:
One commenter writes they are supportive of the distribution of CDBG-DR funds and the grant programs that have been created.

Response:
The State appreciates public feedback.

Comment:
One commenter requested that funds be available for homeowners to replace what they lost and not to go back into debt with another 30 year mortgage.

Response:
Housing programs account for over one third of the disaster recovery distribution and the State

has created a variety of programs designed to assist homeowners and renters in their recovery, including home repair, construction, and down-payment assistance.

Comment:
One commenter requested the use of funds be made available to the Latino community to help with additional funding needed in order to rehabilitate housing.

Response:
The Housing programs that have been created will offer funding to eligible applicants within all communities that have unmet needs and those that benefit low to moderate income individuals.

Comment:
One commenter asked to have media communication channels available for the Spanish speaking communities as well as interpreters for public meetings.

Response:
The State of Colorado has made Spanish interpreters available at the public meetings and has sent out all public hearing notices to the Spanish media outlets. The State of Colorado continues to provide outreach to the Latino community. On Colorado's website, the Action Plan can be found online in Spanish and the website can also be translated into Spanish.

Comment:
One commenter asked if there will be additional state and federal funds to address the funding needed to fill the unmet need gap for Habitat for Humanity.

Response:
In the revised Partial Action Plan the State has arranged its housing programs in such a way that puts them into two separate pools of funds. There are the sub-recipient programs and sub-grantee programs. The State has designed the programs so that eligible applicants, such as Habitat for Humanity, may access funds from the larger pools of money for more flexible use of funds (e.g. if there were a larger need for down payments than temporary assistance and housing repairs, etc.)

Comment:
A commenter has requested that The Colorado Foreclosure Hotline and its partner agencies be considered as eligible recipients of CDBG-DR funds.

Response:
To assist in foreclosure prevention, the State will require counseling access to those beneficiary households under 50% LMI and will encourage all others to attend this counseling as well. This will be done through leveraged partnerships however, as limited funding will be directed to homeowners and renters in this allocation.

Comment:
One commenter asked if the repayment of a loan for rehabilitation be considered an eligible expense.

> **Response:** Pre-agreement costs for the State, subgrantees and subrecipients are allowed within the parameters described in the Action Plan.

Comment:
A HUD-approved housing and counseling agency requested they be able to use CDBG-DR monies to carry out counseling and technical assistance to those homeowners receiving CDBG-DR funds for rebuilding, temporary housing, and helping applicants to access their different funding options. The commenter suggested that the Action Plan be revised to include housing and financial counseling to homeowners impacted by this disaster.

> **Response:**
> DOLA is designing technical assistance tools and training information in partnership with other administering agencies (i.e. Office of Emergency Management, Department of Agriculture, etc.,) to ensure the capacity required for delivery of programs is in place, regardless of the intended beneficiary. The list of tasks/skills provided by Foreclosure Prevention Hotline staff is an example of the kind of capacity this TA should instill. Funds reallocated by the Attorney General's Office for flood recovery includes intention of funding housing counseling so as not to detract from existing program and their intended recipients. The flexibility of this funding is part of the reason this source is made available for counseling, and the State doesn't want to use up DR funds for the counseling, but prefers to fund it separately in this way.

Comment:
One commenter indicated that the evacuation centers were not as effective and efficient as it states in the action plan and suggests that some of the CDBG dollars be used to build evacuation centers/ shelters that have the necessary components needed to assist those displaced from their homes in the event of a disaster.

> **Response:**
> Critical facilities may be eligible for certain federal funding streams. However, the limited amount of funds available through the CDBG-DR allocation is cost-prohibitive for constructing new emergency shelters.

2. City and County Comments Received

City of Lafayette

Comment:
The Action Plan should commit to serving the required percentage, 51%, of low- and moderate-income benefit (LMI) and not the higher standard of 71%. Given the urgent public infrastructure needs, many of which may not qualify as providing LMI benefit, having a higher percentage will limit the ability to address those needs.

Response:
The State has structured its programs to allow the money to benefit up to 63% low to moderate income. It will be difficult to tell what percentage of individuals will apply for and utilize the program funds, so the 63% is a predictor.

Comment:
Increase the Public Infrastructure allocation to 50% of the total award. This is more consistent with the unmet needs and will enable a greater portion of the funding to address the highest priority community needs. Some public infrastructure projects will meet the LMI benefit test. Change the proposed infrastructure program scoring to weight urgent need the heaviest, LMI benefit in the middle and prevention of slums and blight the least. Prioritize local match for projects already completed or underway in order to support affected communities' ability to restore their current financial health. Allow completed projects to be eligible and receive the same or higher score than those that can be completed in six months. This will also support affected communities' ability to restore their current financial health.

Response:
Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
Decrease the Housing allocation to 35% of the total award by reducing the amount proposed for new housing construction. Re-housing people, either through repair programs or relocation is a higher priority now. Increase the amount allocated for housing repair by reducing new construction and down payment assistance. Combine the rental and single-family construction programs to enable greater responsiveness to community housing needs. Permit predevelopment funding and land acquisition for new construction if possible given spending deadlines. This will enable projects to be ready for a second CDBG-DR award.
New construction in communities with destroyed housing should be prioritized to support community rebuilding. New construction more than 10 miles from destroyed housing should not be eligible or least is a very low priority. Specify that replacement of well and septic systems with public services is an eligible housing repair expense.

Response:
The revised plan has consolidated the housing programs to allow communities more flexibility around addressing their existing needs. The maximum award under housing repair has been increased.

Comment:
Decrease the Economic Recovery allocation to 15% of the total award as both public infrastructure and housing needs are more urgent.

Response:
While housing and infrastructure represent urgent needs, many communities have also expressed urgent economic recovery needs. Economic recovery is critical to getting communities back in place.

Comment:
State the intention to distribute CDBG-DR funding in rough proportion to the unmet needs of affected communities and provide some mechanism, such as scoring, to prioritize projects accordingly.

Response:
Through the Economic Revitalization, Housing and Infrastructure programs the eligibility requirements for each of the programs will be used as the mechanism to prioritize projects.

City of LOUISVILLE

Comment:
The Action Plan should commit to serving the required percentage, 51%, of low- and moderate-income benefit (LMI) and not the higher standard of 71%. Given the urgent public infrastructure needs, many of which may not qualify as providing LMI benefit, having a higher percentage will limit the ability to

address those needs.

Response:
The State has structured its programs to allow the money to benefit up to 63% low to moderate income. It will be difficult to tell what percentage of individuals will apply for and utilize the program funds, so the 63% is a predictor.

Comment:
Increase the Public Infrastructure allocation to 50% of the total award. This is more consistent with the unmet needs and will enable a greater portion of the funding to address the highest priority community needs. Some public infrastructure projects will meet the LMI benefit test. Change the proposed infrastructure program scoring to weight urgent need the heaviest, LMI benefit in the middle and prevention of slums and blight the least. Prioritize local match for projects already completed or under way in order to support affected communities' ability to restore their current financial health. Allow completed projects to be eligible and receive the same or higher score than those that can be completed in six months. This will also support affected communities' ability to restore their current financial health.

Response:
Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
Decrease the Housing allocation to 35% of the total award by reducing the amount proposed for new housing construction. Re-housing people, either through repair programs or relocation is a higher priority now. New construction will be a higher priority for a second CDBG-DR award. Increase the amount allocated for housing repair by reducing new construction and down payment assistance. Combine the rental and single-family construction programs to enable greater responsiveness to community housing needs. Permit predevelopment funding and land acquisition for new construction if possible given spending deadlines. This will enable projects to be ready for a second CDBG-DR award. New construction in communities with destroyed housing should be prioritized to support community rebuilding. New construction more than 10 miles from destroyed housing should be a very low priority

or not eligible. Specify that replacement of well and septic systems with public services is an eligible housing repair expense.

Response:
While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
Decrease the Economic Recovery allocation to 15% of the total award as both public infrastructure and housing needs are more urgent.

Response:
While housing and infrastructure represent urgent needs, many communities have also expressed urgent economic recovery needs. Economic recovery is critical to getting communities back in place.

Comment:
State the intention to distribute CDBG-DR funding in rough proportion to the unmet needs of affected communities and provide some mechanism, such as scoring, to prioritize projects accordingly. Feel free to contact me if you have questions.

Response:
Through the Economic Revitalization, Housing and Infrastructure programs the eligibility requirements for each of the programs will be used as the mechanism to prioritize projects.

ESTES PARK

Comment:
The two year time frame to expend funds may be challenging for some projects. It was stated that damage continues to be discovered one year after the disaster, and there are other projects that may need to be coordinated with the CDBG-DR funding such as HMGP and NRCS. Winter weather delays also need to be considered in the time line.

Response:
HUD requires that all CDBG-DR projects are completed within two years.

Comment:
It is not entirely clear what is expected from the Comprehensive Planning segment. The draft action plan provides sufficient information on what planning may include but it does not clearly state the expected

outcome from this proposed project.

Response:
The planning section is meant to support and facilitate the building blocks of community revitalization and economic stability by financially supporting long range planning needed to develop sound, strategic, innovative projects for future CDBG DR funding

Comment:
Please consider acquisition of vacant land that is located in a floodplain or what might be a new floodplain area with new mapping, especially when the property was damaged from the Sept flood and/or is adjacent to property with structures (and there may be other criteria).

Response:
In the housing program the Clearance and Demolition sub recipient program addresses this issue.

Comment:
We support the addition of marketing to get the message out for the tourism industry. This may seem like a secondary issue; however it goes to the root of the problem we are facing in Estes Park, not just treating the symptoms. Certainly we have some serious needs for infrastructure repair and housing assistance in the area; however, a sustainable recovery means jobs which in turn mean visitors. Without visitors our businesses will languish and won't be able to sustain jobs. Without jobs there won't be tax revenues to maintain the infrastructure and people will not be able to afford their homes, even if they are repaired or replaced. We need to get the word out that Northern Colorado is open to visitors and that time is now, as people are planning their summer trips. This is not just a local issue but an issue of statewide concern as well, as Rocky Mountain National Park is a major factor in the summer tourism economy of the State of Colorado. We discussed this with HUD Secretary Donovan in January and he informed us that waivers to allow funding for marketing dollars have been made in the past for other CDBG-DR programs and given the importance of tourism in our economic health he encouraged us to pursue a waiver for this purpose as well.

Response:
Marketing for tourism is not an eligible use of CDBG-DR funds absent a waiver. The State recognizes that tourism is critical to many impacted communities, including Estes Park. We are seeking a waiver to use the CDBG-DR funds for this purpose.

Comment:
We also have some concern that the study identifies that the 54% of the unmet need is in infrastructure, yet only 32% of the resources have been allocated for this purpose. Twenty-two percent (22%) of the unmet need was identified as housing; however, 43% of the funds are allocated to this purpose. These proportions do not seem appropriate for the need identified. It is appropriate that the largest portion of the housing allocation be budgeted to housing repairs, but there is concern that the second largest

allocation of $6,264,300 has been programmed for rental construction. This is probably justified if the funds are used in some of the communities that had large numbers of lower income residents displaced by the flood, especially the mobile home parks in Weld County. There is concern in the area that some of these funds may be used opportunistically to fund rental units is some of the larger communities that were not heavily impacted by the flood who had rental shortage prior to the flooding.

Response:

Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:

We encourage DOLA to pursue a waiver to allow funding to be used on private roads and on publically owned but privately maintained roads. This is a critical issue to several of our surrounding communities, including Big Elk Meadows, Glen Haven and areas with a Lyons address but are in Larimer County (Blue Mountain, Pinewood Springs). What is the point of providing money to fix a home that you can't get to? Many of the residents in Glen Haven work or have businesses in Estes Park and the Town has a vested interest in this community being made whole.

Response:

In an effort to address this issue, we have created an infrastructure program to repair private roads and bridges that access primary homes. Repair of private roads that provide access to secondary homes is not an eligible use of CDBG-DR funds absent a waiver. We have a place holder in the action plan to address repair of private roads and are seeking a waiver for private roads that service secondary residences. This is addressed on page 59.

Comment:

We have heard that the community development block grant application process is difficult. If this is the case, please consider offering technical assistance, and making the process as user friendly as possible with clear and concise application guidelines, easy to follow and read instruction, and examples.

Response:

We appreciate your comments and are making the application process as streamlined as

possible to allow for quick use of the allocated funds.

TOWN OF LYONS

Comment:
The share of infrastructure should be increased given its importance in ensuring that households and businesses have roads and utilities restored sufficient to underpin business recovery and housing repairs.

Response:
Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
We believe CDBG-DR funding should align with the location of disaster impact. 96 percent of total unmet needs in housing are in Boulder, Larimer and Weld Counties. The potential that 20 percent of funding might go outside of these highly impacted counties raises concerns. We suggest a statement that housing funding will be focused on the most highly impacted populations. If there is a minimum to those three counties, 90 percent would be more in line with unmet needs estimates.

Response:
The State's intention is to address the most urgent need with the CDBG-DR funds. Per the HUD requirements, 80% of funds will go to Boulder, Larimer, and Weld counties. There were, however, 15 other counties included in the Presidential Declaration, some of which suffered extensive damage to housing.

Comment:
The way the Action Plan is drafted, the Town of Lyons would not have direct access to CDBG-DR monies for housing or economic development even though our businesses and housing stock are some of the hardest hit by the disaster and the Town currently has effective recovery efforts on-going in both of those areas that could be expanded with CDBG-DR funding.

Response:

The Action Plan has been revised to allow all units of local government to apply for the housing programs.

Comment:
For example, in housing, the draft action plan states that "to maximize efficiency and foster rapid implementation, the State will award funds to sub-recipients already operating housing programs in flood-impacted areas, making use of existing capacity and building on local housing market knowledge" pg. 52. The Town of Lyons requests that municipal governments be eligible applicants in order to increase efficiency and effectiveness. For example, although the Town of Lyons does not have an established housing authority, we are currently operating the most active post-flood housing repair program in the County leveraging humanitarian organizations. Continuing these efforts can be coordinated with county-level house repair funding and will help crowd-in private resources. The Town of Lyons has the capacity to manage this program with CDBG support. The alternative is to redirect all housing repair efforts to county organizations that have no presence or outreach history in the Town of Lyons, which will weaken our local response. We request that municipal governments be added to the list of eligible applicants.

Response:
The Action Plan has been revised to allow all units of local government to apply for the programs

Comment:
Similar to the point on housing above, we request that economic development departments of municipal governments be added as an eligible category to the tourism marketing program. The Town of Lyons in collaboration with its Economic Development Commission and the Chamber of Commerce carries out marketing efforts and has been central to organizing business recovery in the flood. Regional efforts tied to Estes Park and Rocky Mountain National Park do not address the immediate needs of getting day-tripper back to Lyons for this summer season. A marketing strategy has been developed and the Town intends to submit a CDBG-DR request in this area. We also have an existing Lyons Business Recovery Fund which has been active in providing grants and loans with private donations and USDA funding. We would like for the State to consider either passing through resources or providing some support for this mechanism to funnel cases to the State program.

Response:
Local governments are eligible applicants under the tourism/marketing program.

<u>Boulder County</u>

Comment:
Our local governments continue to urge the state to ensure that that the most urgent unmet needs are adequately funded by the first, relatively limited $62.8M allocation of CDBG-DR dollars. We have identified our communities' most urgent needs relevant to CDBG-DR as those actions needed to protect health and safety (waterways, debris removal, property acquisition), to provide repair and access to

homes (housing repair, private roads and bridges, well and onsite wastewater repair, relocation assistance), and to enable our local governments to continue with infrastructure and other recovery projects (local match). The state's proposed distribution of the CDBG-DR allocation remains disproportionately low for Public Infrastructure, particularly in light of the identified unmet need in that category of $1.16B, which is more than 55% of the total unmet need in the state. The current plan allocates $20M to Public Infrastructure statewide, or 35% of the total CDBG-DR allocation, which might not be enough to address our communities' urgent needs. Public Infrastructure projects are costly, pose a threat to health and safety for our residents and neighborhoods if not addressed, and in many cases (waterways, for example) are not covered by other funding sources. Thus we urge that this category be adequately funded.

Response:

Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:

We continue to urge greatest funding for Public Infrastructure (50% of total would be appropriate), which includes costly yet vital projects such as local match; infrastructure projects, such as waterways or other larger scale projects that have no other federal funding source; and property acquisition for hazardous homes.

Response:

Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in

recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
The Scoring Worksheet is a helpful tool. However, we urge the state to change the proposed Public Infrastructure program scoring to weight urgent need the heaviest, LMI benefit second, and prevention of slums and blight the least (p. 61). If existing conditions pose a serious and immediate threat to the health and welfare of the community, it would seem to be of greater importance than eliminating or preventing a slum/blight influence and some infrastructure projects will not be able to provide a low/moderate income benefit.

Response:
In the Action Plan for infrastructure programs the urgent need, LMI and slums and blight are all weighted the same. The communities will prioritize their projects, so the preference toward urgent need can be addressed through community priority.

Comment:
Local Match is critical to local governments, and we recommend that the state implement an efficient disbursement model for these funds, to ease the serious cash flow issues in hard-hit places with high recovery project costs such as all of the communities of Boulder County. While local governments pay millions of dollars out of our budgets for recovery projects, FEMA reimbursement coming through the state is taking many months, creating precisely the cash flow challenge that CDBG-DR local match dollars can address. Local match is particularly important to small communities such as Lyons and Jamestown, which currently are experiencing cash flow problems that, if not solved quickly, can halt the work they are doing to bring their communities back after this disaster.

Response:
We appreciate your comments and are making the application process as streamlined as possible to allow for quick use of the allocated funds.

Comment:
At present in the local match (cost share) programs in the Recover Colorado Infrastructure Grant Program (pp. 58-59), FHWA is not listed as an eligible project for local match. We recommend adding FHWA local match as an eligible CDBG-DR cost share project, as it is a priority not only for Boulder County, but also for Louisville and Longmont due to shared roadways.

Response:
We are currently not including this program as an eligible expense in the infrastructure category. This will add an extra layer of administrative support that the State is not equipped for at the moment. If there continues to be an urgent unmet need in this area we can consider an amendment in the future.

Comment:
Property acquisition is a high priority to mitigate future disaster for residents in the floodplain and hazard areas. Some properties that clearly are at risk and/or are unsafe for habitation are not located in the floodplain and will not qualify for the Hazard Mitigation Grant Program (HMGP, or 404). In Jamestown alone, for example, we anticipate that of 13 homes that clearly are in a hazardous area, six homes likely will qualify for HMGP and seven will not. Boulder County currently has a list of 80 homes for potential buyout, a number of which will not qualify for HMGP but without a doubt should be bought out. CDBG-DR is the only funding source to acquire properties that do not qualify for HMGP so that those residents can move from a hazard area. We need to ensure property acquisition is adequately funded, as these projects are costly and currently are classified in the already-crowded and potentially under-funded Public Infrastructure category.

Response:
The infrastructure program could be utilized for this type of activity.

Comment:
The state did create a Public Infrastructure Projects category based on feedback, which we appreciate and will enable important project work such as waterways. Debris removal, which also is critical, will require a waiver, and we support the state's waiver request to HUD.

Response:
Debris removal of private property is not typically an eligible use of CDBG-DR funds. We are working with HUD on a waiver to allow local governments, special districts, and other units of government to apply for CDBG-DR funds for this purpose.

Comment:
There appears to be a typo on page 61, where it states that the "CDBG-DR award amount maximum will be $100 million."

Response:
This is not an error. We are hoping we receive additional CDBG-DR funds and can finance this to a greater amount.

Comment:
In the Housing category, we have identified the greatest needs as housing repair, assistance for displaced residents, property acquisition, and private roads and bridges. Data in the Action Plan show that Boulder County had more than half of the total homes listed as damaged or destroyed in Colorado. We are counting on CDBG-DR funds to help resident's repair and access homes.

Response:
We have consolidated our housing programs and increased the maximum housing repair award.

Comment:
With more than 10,000 homes damaged in Boulder County, we anticipate significant need in housing repair and assistance for displaced residents. Therefore, we ask that the state adequately prioritize most urgent access and health and safety needs (Public Infrastructure, property acquisition, housing repair, assistance for displaced residents) as well as pre-development in round one, and appropriately fund longer-term needs such as housing construction in the second round when the hardest hit communities are ready to begin that work.

Response:
We have consolidated our housing programs and increased the maximum housing repair award.

Comment:
Boulder County's most immediate need is Housing Repair (and Public Infrastructure), rather than Housing Development. The Action Plan in several places mentions the need to ensure that housing assistance is directed to those directly affected by the floods (e.g., p. 44, p. 53). However, we are concerned that, with no "shovel ready" housing developments in areas with destroyed housing in Boulder County, we will miss an opportunity to replace lost housing here. Housing construction is not the highest immediate priority for our communities in the first round of CDBG-DR funding, as our most impacted communities such as Lyons, Jamestown and Longmont do not have any "shovel ready" housing development projects, though they are prepared to apply for predevelopment funds (planning, design) and potentially land acquisition in the first round, and plan to apply for housing construction in the second round. Of the $10M currently slated for housing development, we likely would only be able to apply for $300k-$500k total, at the most.

Response:
The Housing programs have been modified; the maximum award for Housing Repairs is $4,000,000 per sub-recipient ($50,000 per household for rehabilitation; $100,000 per household for structural relocation). There is more on this program on pg.55.

Comment:
In the Housing Repairs category (p. 53), local governments are not listed as an eligible sub-recipient and definitely should be. Longs Peak Energy Conservation and the City of Longmont run successful local housing rehabilitation programs and should be eligible to receive funds as a sub-recipient.

Response:
The Action Plan has been revised to allow all units of local government to apply for the programs

Comment:
The Public Infrastructure section of the Action Plan included a transparent Scoring Worksheet (pp. 61-62). A similar tool would be very helpful for local governments in the Housing section, for our planning and application purposes.

Response:
Housing programs will be facilitated in a similar way to the way regular CDBG funds are distributed by the State.

Comment:
Since most of the families that would be participating in a home purchase program were already homeowners before they lost their home in the flood, we recommend they not be forced to complete a homeownership education program. Make this a requirement if the applicant truly is a first time homebuyer.

Response:
The Action Plan was modified and now states that non first time homebuyers do not need to complete the homeownership education program. The homeownership education program will be available upon their request.

Comment:
Even though it is a requirement for participation in the Down Payment Assistance Program, Housing Counseling is not a program proposed for funding. This amounts to an unfunded mandate to the local communities or non-profit administering the program. The cost of providing Housing Counseling and/or Homeownership classes where required, should be considered part of the program delivery and should be able to be funded as part of this program.

Response:
DOLA is designing technical assistance tools and training information in partnership with other administering agencies (i.e. Office of Emergency Management, Department of Agriculture, etc.,) to ensure the capacity required for delivery of programs is in place, regardless of the intended beneficiary. The list of tasks/skills provided by Foreclosure Prevention Hotline staff is an example of the kind of capacity this TA should instill. Funds reallocated by the Attorney General's Office for flood recovery includes intention of funding housing counseling so as not to detract from existing program and their intended recipients. The flexibility of this funding is part of the reason this source is made available for counseling, and the State doesn't want to use up DR funds for the counseling, but prefers to fund it separately in this way.

Comment:
Units of Local Government are not listed as an eligible applicant. The City of Longmont operates the Boulder County Down Payment Assistance Program for any income eligible household purchasing in Boulder County outside of the City of Boulder and has since it was funded by the State in 1997 as a countywide program. UOLGs should be eligible applicants if they are already operating an existing state or HUD funded down Payment Assistance programs.

Response:
The Action Plan has been revised to allow all units of local government to apply for the programs

Comment:
The state mentioned that homes receiving funding through Housing Repair programs also will be required to go through weatherization. However, aside from mention of current building codes and standards, we did not see weatherization explicitly mentioned.

Response:
The weatherization requirement is no longer in this sub-recipient program. Housing repairs must become eligible for the NFIP and attain building permits.

Comment:
We appreciate the addition of Clearance and Demolition, but are unsure about the limitation on areas declared as "slum and blight." We also think this category might be underfunded, but will not be sure of that until the need is clearer.

Response:
The acquired property is in an area designated by the Unit of Local Government as a slum or blighted area, and the property will be used in a manner which addresses one or more of the conditions which contributed to the deterioration of the area. This is listed on pg. 56 in the action plan.

Comment:
Relocation activities (rental assistance, mortgage assistance, etc.) do not appear to be funded in the Action Plan. These programs are important for the many residents that were displaced by the floods. In addition, people that will go through HMGP or CDBG-DR property acquisition will need assistance during and after that long-term process to ensure they can permanently relocate and stabilize their families.

Response:
Relocation activities are now addressed in the Action Plan in the rental assistance and housing purchase sub-recipient programs.

Comment:
In the Economic Revitalization category, the state did add a category for broader marketing grants for local governments. Although not a priority for Boulder County, we know that this is important to Lyons and other communities, and we appreciate the addition of this category.

Response:
Thank you for your collaboration and support of other flood impacted counties.

Comment:
We also recognize the inclusion of $5.5M for agriculture recovery projects. This is a great need for our

farming community.

Response:
Thank you for the comment. Agriculture related recovery is available under both our economic bucket and the infrastructure bucket. While we have slightly adjusted the agriculture business grants, we recognize that infrastructure recovery is available under the infrastructure programs.

LARIMER COUNTY

Comment:
When looking at the three funding areas under CDBG-DR (housing, infrastructure and economic impact), all three would be significantly improved through the increased funding toward infrastructure. Currently residents do not have access to existing homes in areas now isolated by flood damage, which infrastructure repairs would correct. An inability to rebuild roads and bridges in the damaged areas will force residents to move out of inaccessible rural areas, abandoning their properties. Large areas of abandoned properties will lead to blight that will be difficult to remediate.

Response:
Repair of private roads that provide access to secondary homes is not an eligible use of CDBG-DR funds absent a waiver. We have placed holder in the action plan to address repair of private roads and are seeking a waiver for private roads that service secondary residences.

Comment:
Larimer County urges the Department of Local Affairs to reconsider their evaluation of providing more funding toward housing than infrastructure. Thank you for your consideration.

Response:
Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

City of Boulder

Comment:
The Action Plan should commit to serving the required percentage, 51%, of low- and moderate-income benefit (LMI) and not the higher standard of 71%. The most urgent public safety needs in our community fall into the infrastructure category. Many of the programs that we proposed to address these needs may not qualify as providing LMI benefit. A higher LMI requirement would further limit our ability to do our most critical work.

Response:
The State has structured its programs to allow the money to benefit up to 63% low to moderate income. It will be difficult to tell what percentage of individuals will apply for and utilize the program funds, so the 63% is a predictor.

Comment:
Allocate funds by categories and sub-categories proportionate to unmet need, while weighing urgent needs most heavily. Specifically, infrastructure accounts for more than half of the estimated unmet need, yet only 32% of the CDBG-DR allocation would go to this category per the draft Act ion Plan. Infrastructure needs are some of the most urgent in our community and, we believe, should be prioritized in the first round.

Response:
Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
General/Housing Comment: The "Housing" category should be reduced during the first allocation round, delaying funding for new development until the second round, while maintaining efforts to re-house, namely repair and relocation. The communities with the most serious flood impacts are still working through buyouts and the footprint and vision for these communities is evolving. We believe it is fairer to these communities to reserve the majority of funding for new construction to a second allocation round. Furthermore, repair to homes or relocation where repair is not feasible is a more urgent matter of health and safety.

Response:
The Housing Programs sections have been adjusted to allow for more flexibility for repair and relocation.

Comment:
In this first round, reduce the "Economic Recovery" category to 15%, as Infrastructure and Housing are more urgent needs related to public health and safety.

Response:
We appreciate your comments, we have heard from other communities that Economic Recovery specifically Tourism/Marketing funds are a priority.

Comment:
Ensure that "repair of water and wastewater systems" be treated as an eligible activity within the Housing Repairs (single family rehabilitation) category or, if a municipal water or wastewater utility is within proximity to the property (and eligible to connect), to fund the costs of connecting to safe and reliable municipal water and wastewater services. Due to the flood, there are between 50 and 200 households proximate to the City of Boulder without safe and clean drinking water and/or wastewater services. Many of the residents of these households are on fixed incomes or have disabilities. While home repairs are needed, if the home does not have safe drinking water and/or wastewater services, it is not habitable, regardless of structural repairs to the home.

Response:
In the Infrastructure program utilities including water treatment facilities are included.

Comment:
Combine the rental and single-family construction fund to allow for greater flexibility to produce resilient new developments that best serve the unique needs of the impacted communities.

Response:
The housing programs were changed to allow for more flexibility.

Comment:
We strongly support the granting of a waiver from HUD to allow us to address our highest infrastructure need: stream clearance and debris and sediment removal. The debris and sediment in our creeks as a result of the September flood pose a future flood hazard during spring run-off and the summer monsoon season.

Response:
Debris removal of private property is not typically an eligible use of CDBG-DR funds. We are working with HUD on a waiver to allow local governments, special districts, and other units of government to apply for CDBG-DR funds for this purpose.

Comment:
Make stream clearance work that is currently underway eligible for reimbursement. The City of Boulder has prioritized and begun infrastructure repairs in order to prevent a secondary disaster. This is the work that most broadly serves the residents of our community. Specifically, we request that the stream clearance and erosion prevention work that has begun be eligible for reimbursement if completed or in process, and that this work receive equivalent points to projects that are shovel ready within six months.

Response:
Eligible activities are reimbursable. Debris removal is not currently an eligible activity absent a waiver. We are seeking a waiver to address this issue.

Comment:
In the Infrastructure scoring program worksheet (p.61-62), the City recommends that an additional criterion be added, or the language of the rating factor related to the HUD national objective #1 regarding a serious and immediate threat to the health and welfare of the community be modified, to benefit multiple jurisdictions partnering. Counties, municipalities, special districts, school districts and other political subdivisions collaborating on a project to benefit multiple interest s should be rewarded. Issues such as safe drinking water and wastewater, or stream clearance and erosion prevention and stabilization are not confined by jurisdictional boundaries.

Response:
In the action plan objective 1 has remained the same on the score card.

Comment:
The Infrastructure Scoring Program Worksheet highlights the fiscal health and financial resources of the applicant in several scaring categories, which handicaps the City of Boulder's bid for much-needed flood recovery resources. Boulder mandates upon itself a larger reserve fund. While we support the intent to distribute assistance to the most damaged communities with the least financial resilience, we do not believe it is fair for our policy of strong fiscal responsibility to exclude us from access to much needed resources.

Response:
HUD encourages the State to distribute the funds to the most urgent unmet needs.

Comment:
Modify the criterion of the disaster impact to the community on a per capita basis to not just be limited to local government infrastructure costs, but both Public Assistance and Individual Assistance costs, to more accurately reflect the flood's impact per capita on the city. In addition, projects where multiple political subdivisions may be collaborating or partnering on an application will have difficulty quantifying some of the per capita impacts or financial resources available.

Response:
Due to input from all communities, we did not modify the plan to accommodate this input.

Comment:
While we support excluding second homes from qualifying for scarce CDBG-DR funds, we encourage you to keep the funds sufficiently flexible to allow for the repair of portions of a homeowner's house or property that were rented out prior to the disaster. In Boulder and in other Boulder County communities some homeowners have been able to afford to purchase a home by renting out a portion of their home - often basements, sometimes bedrooms, "in- law apartments", carriage house units or "granny flats". These in-home/on-property rentals not only provide a source of income that offsets what may otherwise be an unaffordable mortgage payment, but also contribute housing to our community. In-home rentals therefore straddle the CDBG categories of "housing" and "economic development". Furthermore, FEMA assistance is only available to "primary residences" and therefore in many cases could not be used in these rented portions of houses, while basement-level rentals were particularly impacted by the flood. SBA loans were not adequate to address needed repairs in all cases. We believe there is an unmet need that, if addressed, would help to stabilize the homeowner and bring these in-home/on-property units back into productive use.

Response:
We did make some changes to allow for more flexibility in the housing programs. Pg. 51

City of Longmont

Comment:
Proportionate funding of Public Infrastructure: The State's proposed distribution of the CDBG-DR allocation still seems disproportionately low for Public Infrastructure, particularly in light of the state's identified un met need at $1.16B (page 8), over 55% of the total unmet need. Even though changes have been made to the allocation of funds from the January Stakeholder meetings, the current proposed amount at 32% of total DR funds (down from a proposed change at one time to 35%) will not be enough to address our most urgent needs (page 4S). An allocation of 5O% of the total award is more in line with our state's unmet needs. While some of the unmet need is in areas that are not eligible or won't be funded by CDBG-DR (i.e. Comcast, Xcel or Verizon), the needs are still quite significant and should be the area of focus for this first round of funding. Further, most of that money appears to be directed to local Match, which is important but not the only critical unmet need in Public Infrastructure.

Response:
Although infrastructure has a larger documented unmet need from a financial perspective, the impact assessment includes many privately insured assets, including utilities, oil and gas and telecommunication businesses. Some of this damage may be eligible for other federal and non-federal resources and the State continues to assess the extent of the unmet need. There is also a large portion of the infrastructure unmet need that represent long-term projects needed for

resilient recovery, rather than urgent unmet need. We are hopeful that we will receive additional CDBG-DR funds that we can prioritize toward those long-term infrastructure projects. While representing a smaller portion of the overall unmet need, housing is an immediate and urgent need as it is crucial to the health, safety, and stability of some of Colorado's most vulnerable citizens. Thus, Colorado has allocated the majority of funding to housing, in recognition of the need to ensure safe, decent, and affordable housing to those directly affected by the floods.

Comment:
Immediate, primary concerns for Longmont include addressing the numerous waterway issues which in many cases are not covered by FEMA or NRCS, removing debris from the channels to protect public and private property from future flooding. Public infrastructure recovery projects are costly, often not funded by other sources, and pose a threat to health and safety for our residents and neighborhoods if not addressed, so we urge that this category be adequately funded. Longmont recommends that the state significantly increase funding in the Public Infrastructure category and add funding for waterways and debris removal. Debris removal requires a HUD waiver, so we do support the state seeking a waiver to allow CDBG-DR to be used for debris.

Response:
Debris removal of private property is not typically an eligible use of CDBG-DR funds. We are working with HUD on a waiver to allow local governments, special districts, and other units of government to apply for CDBG-DR funds for this purpose.

Comment:
We also request that Public Infrastructure local match eligibility not be based on completed FEMA Project Worksheets, but also consider those committed, in process, etc. While local governments payout of our budgets for millions of dollars in recovery projects, FEMA reimbursement, coming through the State, is taking many months. That creates precisely the cash flow issue that CDBG-DR local match dollars should be utilized to address. With accessible local match assistance, local governments can continue with road, water infrastructure and other considerable recovery efforts, and not have to halt projects due to lack of funds.

Response:
The infrastructure plan as currently drafted addresses the most urgent projects. We are hoping to reflect this policy by only permitting CDBG-DR dollars to be used for completed project worksheets. We are hopeful to receive a second allocation of funding that can go toward more long-range projects. Additionally, HUD requires the money to be spent in two years, so we need to have some assurance that the projects are ready to go.

Comment:
The Minimum/Maximum awards states that the maximum CDBG-DR award amount will be $100 million. Is this a typo and should be $100,000?

Response:
The state is hopeful that we will receive a second round of funding and be able to fund infrastructure projects at a much larger amount.

Comment:
Rating Factors: For meeting a national objective, we propose that meeting an urgent need be given a higher ranking compared to the other objectives. If existing conditions pose a serious and immediate threat to the health and welfare of the community, it would seem to be of greater importance than eliminating or preventing a slum/blight influence and many infrastructure projects will not be able to provide a low/moderate income benefit.

Response:
The actual amount of points that can be received for low mod, urgent need or slum and blight are low in comparison to other criteria (3 points each). Likewise, getting full credit for low-mod will be more difficult than urgent need the way we set it up. We try to further address urgent need by letting the communities prioritize their projects and adding in some of the health and safety criteria.

Comment:
Page 63-64 - The weighting and formula for community impact based on a per capita basis and overall fiscal health is skewed to give higher ratings to smaller communities as opposed to the overall magnitude of damage in any community. Priority should also consider the overall magnitude of the damage done.

Response:
HUD encourages the State to distribute the funds to the most urgent unmet needs.

Comment:
Rapid project implementation less than 6 months provides greater weight to smaller projects and does not consider those larger projects which inherently take a longer time to properly engineer and design. Equal weight should be given to all projects that are implemented within 2 years.

Response:
The infrastructure plan as currently drafted addresses the most urgent projects. We are hoping to reflect this policy by only permitting CDBG-DR dollars to be used for completed project worksheets. We are hopeful to receive a second allocation of funding that can go toward more long-range projects. Additionally, HUD requires the money to be spent in two years, so we need to have some assurance that the projects are ready to go.

Comment:
Can families purchase a new or existing mobile home under this program or are they only allowed to

purchase stick-built homes? If so, this will severely limit purchase options for lower income families in Boulder County.

Response: Families can purchase a new or existing mobile home under this program.

Comment:
Units of Local Government are not listed as an eligible applicant. The City of Longmont operates the Boulder County Down Payment Assistance Program for any income eligible household purchasing in Boulder County outside of the City of Boulder and has since it was funded by the State in 1997 as a countywide program. Over 15% of all loans made to date have supported purchases outside of the City of Longmont. UOLGs should be eligible applicants if they are already operating an existing state or HUD funded down Payment Assistance programs. Forcing us to duplicate services by entering into a funding agreement or partnership with an eligible applicant that doesn't operate in our community would not seem to serve our community well and would be inefficient and potentially a waste of resources and time as another entity would have to become familiar with our community. It does not "make use of existing capacity and build on local housing market knowledge" as stated in the Action Plan (page 52).

Response:
The Action Plan has been revised to allow all units of local government to apply for the housing programs.

Comment:
The city feels that the Single Family Rehabilitation Program should allow for grants to be given to these homeowners who have had their lives turned upside down and in some cases have been out of their homes or living in only part of their home for S months now. At a minimum, graduate the level of property interest based on income so that the lowest income families are not further burdened by a lien on their home. Putting even a deferred loan on a home owned by someone at or below 50% AMI will not necessarily result in recouping the full value of the loan and may impact their ability to gain wealth and move up in homeownership or to stabilize their economic situation if their property increases in value, but an interest bearing loan is due at sale or refinance. Suggest graduated levels of property interest based on income levels i.e. 0% - 50% AMI is a grant, 51%- 80% AMI is a deferred loan, and 81% and above is an amortized loan with monthly payments.

Will a preference be given to primary living space repairs over basement repairs (unless a prior to flood used bedroom/bathroom is in basement), or will this be a local program call?

Units of Local Government are not listed as an eligible applicant. The City of Longmont operates its own Housing Rehabilitation Program and while never funded by the State, has been in operation using CDBG funding since 1984. We provide full rehab services including a General Rehab program (up to $25,000 which could be increased to match program criteria), an Accessibility Program and an Emergency Grant Program. UOLGs should be eligible applicants if they are already operating an existing rehabilitation program that is in good standing with HUD. Forcing us to duplicate services by entering into a funding

agreement or partnership with an eligible applicant that doesn't operate in our community would not seem to serve our community well and would be inefficient and potentially a waste of resources and time as another entity would have to become familiar with our community. It does not "make use of existing capacity and build on local housing market knowledge" as stated in the Action Plan (page 52).

Clearance and Demolition Program - page 56

Eligibility criteria on page 56 states that the acquired property must be designated as a slum/blight area; does the area have to have been designated as such pre-flood? And, will the designation have to follow the formal procedures under State law for designating a slum/blighted area, or can it be officially designated by the community and meet a definition of slum/blight under state or local law? Why could it not meet the Urgent Need criteria?

17% of the funding is proposed for new construction programs (page 51, Table 25) is a significant portion of the funding, especially given that the State has also shifted funding from other resources (mortgage payoff) to new construction to aid in flood relief. Only 14% of the total is allocated for repairs to homes that are already owned by and available to flood victims and likely could be repaired and occupied in a much quicker time frame than the process for new construction. Consider decreasing the amount allocated for new housing construction. • Single Family Housing Construction - It is stated on page 51 that "the single family housing construction programs will allow homeowners to rebuild quality homes or repair their existing homes." How is this element differentiated from the Home Repair Program listed above as a separate program? The Single Family Housing New Construction Program shown on page 55 doesn't seem to speak to the ability to conduct repairs.

Maximum award is listed at $2 million per sub-grantee, this is half of the total amount set aside in this category, and does that make sense to have potentially 2 awards in the entire 11 county area? Maximum award on page 56 is showing as $4 million, assume this is a typo?

Multifamily Rental New Construction - Rental housing development is a high priority for Longmont and our most immediate need is for 1) refinancing an existing permanent supportive housing development which is housing several people displaced by the flood and 2) for pre-development funding. Our local Housing Authority needs to refinance the existing property so that its financing becomes stabilized and its supportive services are able to be paid by rents collected. This project serves 72 very low incomes, hard to house people including up to 38 units for chronically homeless individuals. Refinancing a project that is housing flood victims to ensure long-term stability does not appear to be an eligible activity/project - is this something that could be considered?

Response:
Updates are included starting on page 54 of the Action Plan.

Comment:
The Housing Authority also holds up to 4 AC of land that is highly developable; 2 AC is already zoned

appropriately and could be ready to go with architectural and engineering plans. The Housing Authority has already started the entitlement work for the other 2 AC, and could be ready with pre-development funding.

Predevelopment funding does not appear to be an eligible use of these funds, or it is not outlined as such in the program description. Predevelopment funding also does not appear to fall under the Redevelopment Planning for High Impact Areas program either. Since most new housing developments in the highest flood impacted areas are not "shovel ready" (using the definition of being ready to bid once financing is in place) and require at least some predevelopment planning, if not land acquisition, it would seem that Predevelopment funding should be made available as a high priority to get projects in the works and get them to the "shovel ready" stage.

Response:
We understand this is a priority for your community, but it was not incorporated into this Partial Action Plan because it was not a priority in all the other communities.

Comment:
In the Economic Development category, the state proposal is for state-run grant and loan programs. Longmont has a robust economic development department and funding structures for various assistance programs, and we would prefer local administration of economic development funds. Longmont has a concern that many home-based businesses of which there are many in Longmont and Lyons, in particular, will not be eligible under the Criteria for funding. Longmont suggests reducing the unmet need requirement of $100,000 to $50,000 for a $25,000 grant. It seems that the proposed income/asset thresholds may preclude some of the low/moderate income businesses from qualifying, although the plan targets 50% of the grants for these businesses. How was the amount of a $10,000 grant to a small business determined? Do we know if this will be enough for businesses impacted by the flood to get back on their feet and provide for lost jobs, or maintain employment levels?

Response:
Because the overall size of the unmet need for businesses is hundreds of millions of dollars and the CDBG-DR will only cover a small percent, we are trying to create parameters around the grants. The proposed grant in the comment is a much higher percent than we can afford to provide each qualifying applicant and would reduce the number people we can help.

Comment:
The plan indicates that businesses must be credit-worthy to qualify; however, many smaller and home-based businesses have no access to credit. In addition, many flood-impacted businesses that had access to credit before the flood may now be in a situation where that is less so. It is important that businesses have one entity to work with to ensure that the process is understandable and the grants/loans get out.

Response:
Because the overall size of the unmet need for businesses is hundreds of millions of dollars and

the CDBG-DR will only cover a small percent, we are trying to create parameters around the grants. The proposed grant in the comment is a much higher percent than we can afford to provide each qualifying applicant and would reduce the number people we can help.

Comment:
Why is the state trying to obtain such a high level of low/moderate income benefit (page 48) at 71%, when it does not have to do so? This severely limits the funding that may be able to be used for Infrastructure projects which are harder to show a low/moderate income benefit, even though this is our greatest community need across the entire flood damaged areas. Suggest a lower LMI benefit (perhaps the required percentage of 51%) be set as a goal in order to maximize and support the greatly needed Infrastructure funding in order to best address local community needs.

Response:
The State has structured its programs to allow the money to benefit up to 63% low to moderate income. It will be difficult to tell what percentage of individuals will apply for and utilize the program funds, so the 63% is a predictor.

Comment:
Page 4, paragraph 3, states that "homes destroyed represent the greatest immediate challenge to the State." Is this really true in light of concerns over how or whether we will be able to handle the spring run-off which could further inundate and flood our communities?

Response:
At the time of the damage of assessment this is accurate.

Comment:
Page 6, paragraph 1, and suggest that you add "Longmont" to the list of communities that were severely impacted.

Response:
We have included Longmont as one of the listed communities.

Comment:
Page 9; suggest that "destroyed units", "damaged units, etc. be defined. This will help all of us have a common understanding of what each term really means.

Response:
We have defined destroyed units.

Comment:
Pages 19 and 20, suggest combining Tables 11 and 12 into one table similar to Table 14.

Response:
Thank you; we were unable to consolidate all the information into the one table.

Comment:
Pages 21-22, suggest adding that a 5% vacancy rate is considered healthy for a community to put the range of vacancy rates into some perspective.

Response:
We have added this on pg. 21

Comment:
Page 23; suggest explaining what comprises the Boulder MSA, vs. using Larimer and Weld Counties. Other previous references are to Boulder (implying Boulder County) or Boulder County, so the question is what is different about the Boulder MSA. Does it include Broomfield in this instance?

Response:
Thank you for your input

Comment:
Pages 35-36, suggest clarifying what agricultural impact means - is it loss of revenue? Cost for repairs or a combination? More detail would be helpful.

Response:
This is defined by crop loss on pg. 35.

Comment:
Page 44,1st paragraph, what does the "oversubscribed needs of the impacted communities" mean exactly. Provide more detail or clearer wording/phrasing.

Response:
Thank you for your input.

Comment:
Page 50, last bullet, how will the existing non-profit provider network of housing counseling agencies meet the increased demand without funding? Boulder County had 8,443 units damaged and 39 units destroyed. Even if only 1/4 of them seek out housing counseling, that increases demand by 2100 clients for one agency. Please reconsider some funding for them, either directly or allowing it to be provided through the Rehab/Repair and DPA programs.

Response:
New construction must be out of the flood plain, rehab can be considered in the flood plain;

however, how are we to determine the flood plain for these programs - former/existing one or new/revised one(s) not yet determined until re-channelization occurs.

Comment:
Current programs should be modified to address these new circumstances - i.e. we should not require homeownership training/housing counseling under the DPA program for everyone as a matter of course, as many households won't be first time homebuyers. Change program requirements to allow for this and require programs to determine if the applicant is a first time homebuyer the homeownership training would be required, but not for someone who successfully owned a home for many years and just happened to lose it to the flood.

Response:
The Action Plan was modified and now states that non first time homebuyers do not need to complete the homeownership education program. The homeownership education program will be available upon their request.

AFFIDAVIT OF PUBLICATION

STATE OF COLORADO
COUNTY OF EL PASO

I, Nicole Jones, being first duly sworn, deposes and says that she is the Legal Sales Representative of THE COLORADO SPRINGS GAZETTE, LLC., a corporation, the publishers of a daily public newspaper, which is printed and published daily in whole at the city of Colorado Springs in the County of El Paso, and the State of Colorado, and which is called The Gazette; that a notice of which the annexed is an exact copy, cut from said newspaper, was published in the regular and entire editions of said newspaper **1 time(s) to wit, February 7, 2014.**

That said newspaper has been published continuously and uninterruptedly in said County of El Paso for a period of at least six consecutive months next prior to the first issue thereof containing this notice; that said newspaper has a general circulation and that it has been admitted to the United States mails as second-class matter under the provisions of the Act of March 3, 1879 and any amendment thereof, and is a newspaper duly qualified for the printing of legal notices and advertisement within the meaning of the laws of the State of Colorado.

Nicole Jones
Legal Sales Representative

Subscribed and sworn to me this **February 7, 2014,** at said City of Colorado Springs, El Paso County, Colorado. My commission **expires April 5, 2015.**

Lora Ramirez
Notary Public

The Gazette

LORA RAMIREZ NOTARY PUBLIC STATE OF COLORADO My Commission Expires 04-05-2015

8.50 x 11.00 in

STATE OF COLORADO
NOTICE OF PUBLIC HEARINGS

In accordance with Federal Register Vol. 78 No. 43, March 5, 2013, FR 5696-N-01, the State of Colorado, Governor's Recovery Office and Department of Local Affairs, are publishing for public comment, the draft Action Plan for the Community Development Block Grant Disaster Recovery (CDBG DR) Program for the expenditure of $62.8 million in flood recovery assistance. The Action Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) February 21, 2014, following a seven day public comment period. Due to the expedient nature of the program, and per the Federal Register notice cited above, the Action Plan will be available for public comment Tuesday, February 11 through Tuesday, February 18, 2014.

The proposed plan will be accessible online as indicated below, February 10, 2014, in English and in Spanish.

The draft Action Plan will be available online Monday, February 10, 2014, at www.dola.colorado.gov/cdbg-dr. A copy of the complete document to be submitted to HUD will also be available for public review during regular office hours from Monday, February 10 through Tuesday, February 18, 2014, by appointment, at the following Department of Local Affairs offices:

North Central Regional Office
150 E. 29th St., Ste. 215
Loveland, CO 80538
(970) 679-4501

Southeastern Regional Office
132 West "B" Street, Suite 260
Pueblo, CO 81003
(719) 544-6577

Central Regional Office
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Golden, CO 80401
(303) 273-1787

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(970) 248-7310

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1000 Rim Dr.
Durango, CO 81302
(970) 247-7311

South Central Regional Office
610 State Avenue, Suite 203
Alamosa, CO 81101
(719) 589-2251

Northeastern Regional Office
109 N. Front Street
Sterling, CO 80751
(970) 867-4961

Public hearings have been scheduled by the Governor's Recovery Office and the Department of Local Affairs for the CDBG-DR Action Plan. Each of the meetings will be recorded, and the recordings will be posted on the CDBG-DR website following the meetings. Hearing dates and times are as follows:

Tuesday, February 11
Manitou/Colorado Springs
4:30 - 6 p.m.
Manitou Springs Memorial Hall
606 Manitou Ave.
Manitou Springs, CO 80829

Wednesday, February 12
Estes Park
Noon - 2 p.m.
Estes Park Town Hall, Board Chambers
170 MacGregor Ave.
Estes Park, 80517

Boulder
7 - 9 p.m.
County Clerk & Recorder Office,
Houston Room
1750 33rd Street
Boulder, CO 80301

Thursday, February 13
Evans
6 - 9 p.m.
Evans City Hall, Cottonwood Banquet Room
1100 37th Street
Evans, CO 80620

As part of the state's CDBG DR Citizen Participation Plan (CPP), citizens are encouraged to review the Action Plan and provide feedback and comments. Citizens wanting to provide public comment at the hearings will be required to sign up upon arrival, with speakers going in the order they sign in. Written comments submitted online will be accepted through close of business, Tuesday, February 18, 2014.

To view the Action Plan, go to:
www.dola.colorado.gov/cdbg-dr

To post comments regarding the Action Plan online, go to:
https://dola.colorado.gov/cdbg-dr/content/comments-feedback

Written comments must be received by

AFFIDAVIT OF PUBLICATION

CAMERA

State of Colorado
County of Boulder

I, the undersigned agent, do solemnly swear that the CAMERA is a daily newspaper printed, in whole or in part, and published in the City of Boulder, County of Boulder, State of Colorado, and which has general circulation therein and in parts of Boulder and Broomfield counties; that said newspaper has been continuously and uninterruptedly published for a period of more than six months next prior to the first publication of the annexed legal notice of advertisement, that said newspaper has been admitted to the United States mails as second-class matter under the provisions of the Act of March 3, 1879, or any, amendments thereof, and that said newspaper is a daily newspaper duly qualified for publishing legal notices and advertisements within the meaning of the laws of the State of Colorado; that a copy of each number of said newspaper, in which said notice of advertisement was published, was transmitted by mail or carrier to each of the subscribers of said newspaper, according to the accustomed mode of business in this office.

The annexed legal notice or advertisement was published in the regular and entire edition of said daily newspaper once; and that one publication of said notice was in the issue of said newspaper dated **February 9, 2014**.

Shayla Najera
Agent

Subscribed and sworn to before me this **10th** day of **February, 2014** in the County of Boulder, State of Colorado.

Melissa L Najera
Notary Public
My commission expires 12/11/2014

ACCOUNT #:322731
AD #1966397
FEE: $253.44

MELISSA L. NAJERA NOTARY PUBLIC STATE OF COLORADO

STATE OF COLORADO

NOTICE OF PUBLIC HEARIN

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1100 37th Street
Evans, CO 80620

Proof of Publication

STATE OF COLORADO
COUNTY OF LARIMER

Michael Romero

Being duly sworn, deposes and says:

1. That he is the publisher of the Estes Park Trail-Gazette, a semi-weekly newspaper printed and published in the Town of Estes Park, County of Larimer and State of Colorado.

2. That the said Estes Park Trail-Gazette is printed and published at regular intervals, two times each week, Wednesday and Friday, and that it has a general circulation in the County of Larimer, and elsewhere.

3. That the said Estes Park Trail-Gazette was established and has been printed and published in said county uninterruptedly and continuously during a period of at least fifty-two consecutive weeks prior to the first issue thereof containing said **Notice of Public Hearing / Action Plan for the Community Development Block Grant Disaster Recovery (CDBG-DR) Program / Colorado Department of Local Affairs**
A copy of which is hereunto attached.

4. That the Estes Park Trail-Gazette is a semi-weekly newspaper of general circulation, and is printed and published in whole or part in the said Town of Estes Park and County of Larimer in which said **Notice of Public Hearing / Action Plan for the Community Development Block Grant Disaster Recovery (CDBG-DR) Program / Colorado Department of Local Affairs**
is required by law to be published, a copy of which is hereunto attached.

5. That the said Estes Park Trail-Gazette is a semi-weekly newspaper within the meaning of an act concerning Legal Notices and Advertisements being Chapter 109 of the Colorado Revised Statutes of 1953.

6. That the said annexed **Notice of Public Hearing / Action Plan for the Community Development Block Grant Disaster Recovery (CDBG-DR) Program / Colorado Department of Local Affairs**
was published in the regular and entire edition of the Estes Park Trail-Gazette, a duly qualified paper for that purpose, within the terms and meanings of the above named acts.

7. That the said annexed **Notice of Public Hearing / Action Plan for the Community Development Block Grant Disaster Recovery (CDBG-DR) Program / Colorado Department of Local Affairs**
is a full, true and correct copy of the original which was regularly published in each of the regular and entire issues of said newspaper, a legally qualified paper for that purpose, once each week, on the same day of each week for **one (1)** week, by **one (1)** insertion and that the first publication thereof was in the issue dated **February 7, 2014** and that the last publication was in the issue dated **February 7, 2014**.

Michael Romero, Publisher

Subscribed and sworn to me this 7th day of **March,** 2014

Leslie Dawson, Notary Public
My commission expires January 10, 2015

STATE OF COLORADO
NOTICE OF PUBLIC HEARINGS

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To post comments regarding the Action Plan online, go to: dola.colorado.gov/cdbg-dr/content/comments-feedback

Written comments must be received by Tuesday, February 18, 2014, at the Colorado Department of Local Affairs, 1313 Sherman St., Room 500, Denver, CO, 80203, ATTN: Linda Rice. To submit comments via E-mail, please send to dola_recovery@state.co.us.

Reasonable accommodations or language translation at the public hearings will be provided upon request. To request accommodation or language translation, contact: Linda Rice, (303) 864-7864, or linda.rice@state.co.us.

Published in the Trail Gazette on Feb. 7, 2014 Ad # 0010894

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STATE OF COLORADO
NOTICE OF PUBLIC HEARINGS

In accordance with Federal Register Vol. 78 No. 43, March 5, 2013, FR-5696-N-01, the State of Colorado, Governor's Recovery Office and Department of Local Affairs, are publishing for public comment, the draft Action Plan for the Community Development Block Grant Disaster Recovery (CDBG-DR) Program for the expenditure of $62.8 million in flood recovery assistance. The Action Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) February 21, 2014, following a seven-day public comment period. Due to the expedient nature of the program, and per the Federal Register notice cited above, the Action Plan will be available for public comment Tuesday, February 11 through Tuesday, February 18, 2014.

The proposed plan will be accessible online as indicated below, February 10, 2014, in English and in Spanish.

The draft Action Plan will be available online Monday, February 10, 2014, at www.dola.colorado.gov/cdbg-dr. A copy of the complete document to be submitted to HUD will also be available for public review during regular office hours from Monday, February 10 through Tuesday, February 18, 2014, by appointment, at the following Department of Local Affairs offices:

North Central Regional Office
150 E. 29th St., Ste. 215
Loveland, CO 80538
(970) 679-4501

Southeastern Regional Office
132 West "B" Street, Suite 260
Pueblo, CO 81003
(719) 544-6577

Central Regional Office
15220 S. Golden Road
Golden, CO 80401
(303) 273-1787

Northwestern Regional Office
222 S. 6th St., Rm. 409
Grand Junction, CO 81501
(970) 248-7310

Southwestern Regional Office
Fort Lewis College
1000 Rim Dr.
Durango, CO 81302
(970) 247-7311

South Central Regional Office
610 State Avenue, Suite 203
Alamosa, CO 81101
(719) 589-2251

Northeastern Regional Office
109 N. Front Street
Sterling, CO 80751
(970) 867-4961

Public hearings have been scheduled by the Governor's Recovery Office and the Department of Local Affairs for the CDBG-DR Action Plan. Each of the meetings will be recorded, and the recordings will be posted on the CDBG-DR website following the meetings. Hearing dates and times are as follows:

Tuesday, February 11
Manitou/Colorado Springs
4:30 - 6 p.m.
Manitou Springs Memorial Hall
606 Manitou Ave.
Manitou Springs, CO 80829

Wednesday, February 12
Estes Park
Noon - 2 p.m.
Estes Park Town Hall, Board Chambers
170 MacGregor Ave.
Estes Park, 80517

Boulder
7 - 9 p.m.
County Clerk & Recorder Office, Houston Room
1750 33rd Street
Boulder, CO 80301

Thursday, February 13
Evans
6 - 8 p.m.

Affidavit of Publication

STATE OF COLORADO
ss.
County of Weld,

I Desirea Larson

of said County of Weld, being duly sworn, say that I am an advertising clerk of

THE GREELEY TRIBUNE,

that the same is a daily newspaper of general circulation and printed and published in the City of Greeley, in said county and state; that the notice or advertisement, of which the annexed is a true copy, has been published in said daily newspaper for consecutive (days): that the notice was published in the regular and entire issue of every number of said newspaper during the period and time of publication of said notice, and in the newspaper proper and not in a supplement thereof; that the first publication of said notice was contained in the Seventh day of February A.D. 2014 and the last publication thereof: in the issue of said newspaper bearing the date of the
Seventh day of February A.D. 2014 that said The Greeley Tribune has been published continuously and uninterruptedly during the period of at least six months next prior to the first issue thereof contained said notice or advertisement above referred to; that said newspaper has been admitted to the United States mails as second-class matter under the provisions of the Act of March 3,1879, or any amendments thereof; and that said newspaper is a daily newspaper duly qualified for publishing legal notices and advertisements within the meaning of the laws of the State of Colorado.

February 7, 2014

Total Charges: $107.18

Desirea Larson

7th day of February 2014

My Commission Expires 6/14/2017

Robert Little
Notary Public

ROBERT LITTLE
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20014018494
MY COMMISSION EXPIRES JUNE 14, 2017