COLORADO
Action Plan for Disaster Recovery
Version 7.5
Updated February 19, 2021

Disaster Relief Appropriations Act. 2013
Public Law 113-2

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Introduction

On September 11, 2013, record rainfall unleashed flooding across 24 Colorado Counties, damaging and destroying homes, businesses, infrastructure and watersheds, carved new river channels, tragically took 10 lives, and changed the lives of thousands of Coloradans. The 2013 floods followed immediately behind three of the most destructive wildfires in State history, the High Park, Waldo Canyon and Black Forest wildfires, which destroyed approximately 1,100 homes and scarred forest and watersheds, leading to ongoing post-wildfire flooding impacts to downstream communities. With each disaster, local, state and federal agencies, non-profits, businesses and individual Coloradans came together to support and carry out critical recovery efforts. One important resource within the portfolio of recovery programs is the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant - Disaster Recovery (CDBG-DR) grant program.

This document consolidates the State of Colorado's original CDBG-DR Action Plan that HUD approved on April 23, 2014, and all subsequent Substantial and Non-Substantial Amendments into one document. The purpose of this combined Action Plan is to provide grantees and the public with a comprehensive and accessible view of the State's CDBG-DR programs, as well as to meet the requirements of Paragraph IV.A1.K. Amending the Action Plan, of 78 FR 14337 (March 5, 2013) which calls for a single plan for public viewing. This document fully describes the unmet needs and use of recovery funding for all three of the State's CDBG-DR grant awards totaling $320,346,000.

The $320.346 million in CDBG-DR allocated to Colorado's recovery efforts derive from the appropriation from Congress from Disaster Relief Appropriations Act of 2013 (Public Law 113-2), which provided recovery resources for presidentially declared disasters in 2011, 2012, and 2013. These funds are intended to supplement other disaster recovery resources including but not limited to FEMA Public Assistance, FEMA individual assistance, Small Business Administration loans, and private insurance. The Disaster Relief Appropriations Act requires that the state or local government must expend obligated 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% of these funds must address unmet recovery needs within the three most impacted and distressed counties from the 2013 floods, Boulder, Larimer and Weld Counties. In addition, the remainder of these funds can address unmet recovery needs within all counties impacted by the following declared disasters in Colorado:

- DR 4145 - Colorado Severe Storms, Flooding, Landslides and Mudslides (September 2013)
- DR 4134 - Black Forest Wildfire (June 2013)
- DR 4133 - Royal Gorge Wildfire (June 2013)
- DR 4067 - High Park and Waldo Canyon Wildfires (June/July 2012)

These resources were awarded to Colorado in three separate allocations as described below. Each allocation resulted in an Action Plan or Substantial Action Plan amendment developed through a series of stakeholder and public meetings led by the Office of the Governor's Colorado Recovery Office (CRO) and the Colorado Department of Local Affairs (DOLA).

On December 16, 2013 (FR-5696-N-07), the State of Colorado was awarded $62.8 million in CDBG-DR funding by HUD in response to the 2013 floods, landslides and mudslides. The State completed an initial Action Plan for these funds, which was approved by HUD on April 23, 2014. On June 3, 2014 (FR-5696-N-09) HUD awarded the State of Colorado $199.3 million of CDBG-DR funding to help address remaining unmet need from flooding and wildfire disasters. Colorado completed Substantial Amendment 1 to the initial Action Plan for this second allocation, and the Action Plan was approved by HUD on November 3, 2014. On January 8, 2015, the State was awarded a third allocation of CDBG-DR funding in the amount of $58.246 million. These funds were addressed in Substantial Amendment 2 that was approved by HUD on July 24, 2015.

Governor John W. Hickenlooper designated the Colorado Department of Local Affairs (DOLA) as the responsible entity for administering these CDBG-DR funds allocated to the State in accordance with the Action Plan and subsequent Substantial Amendments. DOLA carries out these duties in coordination with the appropriate State agencies including DOLA's Division of Housing (DOH) and Division of Local Government (DLG), the Division of Homeland Security and Emergency Management (DHSEM), the Office of Economic Development and International Trade (OEDIT), and the Colorado Department of Agriculture (CDA). Additionally, through the sub-allocation process described later in this document, DOLA has sub-granted second and third allocation funds to the Boulder County Collaborative to be administered by the City of Longmont.

Disaster Impacts

In September 2013, Colorado experienced the most costly disaster in state history, suffering catastrophic flooding as a result of unprecedented rainfall across 24 counties in the State. High-velocity floodwater racing down 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. Approximately 118 lane miles of state highways were damaged or destroyed, cutting off access to entire communities. Families, including many of low to moderate income, had to abandon their homes. The September floods impacted the entire social fabric of the State, causing major destruction to housing, businesses, and infrastructure.

Local governments and civic leaders continue to face tremendous burdens to meet fiscal, social and environmental challenges greater than they have seen before. The geographic environment was fundamentally altered as floodwaters re-charted entire river channels. Infrastructure and public facilities suffered significant damage. 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, resulting in continuing watershed instability.

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. 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 wildfires from 2012 and 2013 also inflicted lasting impacts on many of the same communities impacted by the floods. Combined, these fires resulted in over 120,000 acres burned and 1,092 homes destroyed. The Waldo Canyon and the Black Forest wildfires both rank in the top 10 list of most expensive fires with insured losses estimated at over $850 million (2014 dollars) with total damages closer to $1.5 billion. In addition to direct loss of housing and infrastructure, the extreme burn intensities and loss of vegetation led to increased runoff from rainstorms, contributed to erosion and sedimentation, and made already vulnerable areas even more susceptible to landslides, mudslides and debris flows during summer rainstorms.

Immediately after each of these disasters, 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. Non-profit and faith-based volunteer groups, volunteer fire departments, local government agencies and other organizations helped to remove mud, sand, and large debris from homes and from river channels. State and local agencies worked around the clock to re-establish connectivity between communities cut off after the floods.

Since the 2012 and 2013 disasters, Colorado communities have made great progress and are in the midst of implementing a monumental ongoing recovery effort. Communities continue to repair, mitigate and replace housing after an estimated 28,363 dwellings were impacted by floodwaters and 1,852 homes were destroyed. Local governments are repairing and rebuilding infrastructure, including water and wastewater, transportation systems and public facilities that provide critical services to the public. Watershed Coalitions and partners are in the process of implementing restoration projects, using nature-based approaches to address erosion, bank stability, habitat and hazard mitigation throughout the flood impacted watersheds. Small businesses and agricultural businesses continue to bounce back with the support of grants to address physical and economic impacts from the floods. Planning processes, intended to address recovery needs and build resiliency for the next disaster are now informing recovery and resiliency investments.

As discussed below, CDBG-DR programs described within this Plan will continue to support local long-term recovery and resiliency efforts and address unmet needs.

Housing
Housing continues to be a priority for Colorado's recovery from both the floods and wildfires. The CDBG-DR program uses a community based approach to program delivery to serve households who suffered impact during the disasters and is well established in Colorado's most heavily impacted areas. Household Assistance Programs, including Home Access, Housing Repair, Housing Purchase, Clearance and Demolition, Temporary Rental Assistance and Relocation are underway through the administration of local government and housing authority partners in Boulder, Larimer and Weld Counties. Housing Repair, serving primarily households in the 15 "balance of state" counties (other than Boulder, Larimer and Weld), is serving households using a partnership with several volunteer-driven nonprofit organizations that began in the summer of 2015 and continues today. In partnership with local governments, housing authorities, and communities, Home Access allows repair and replacement of the private roads, bridges and culverts damaged or destroyed by the floods and fires that serve primarily low to moderate income residents.

Construction of affordable housing is also a key component for the recovery effort, including single family homes for purchase and rental housing. With uncommonly low vacancy rates in the state's rental housing market prior to the 2013 flood, the need for additional rental housing was only exacerbated by the disasters, and the rising market rents with demand well outstripping supply. Thus, the Division of Housing has partnered with the Colorado Housing and Finance Authority to leverage CDBG-DR Construction dollars with the new State Tax Credit program, a joint round of underwriting piloted in spring 2015, and continued in 2016 and 2017.

Additionally, the Division of Housing's ongoing partnership with Habitat for Humanity of Colorado builds upon a successful model to support Habitat's Project Rebuild, where its affiliates utilize Housing Construction funds to construct new and replacement homes for households impacted by the floods and wildfires in each of the eligible counties.

Infrastructure
The Recover Colorado Infrastructure (RCI) program is providing support to communities and private non-profit service providers to both rebuild assets and facilities damaged in the 2013 disasters and to build resilience in the face of future threats. To date, funded projects include repairs to flood ravaged waterways, water and wastewater utilities, roadways and public facilities. Strategic property acquisitions that avoid repetitive losses and build resilience have been supported in 5 communities. The initial round of funding is also helping communities leverage other recovery funding sources. The RCI program is providing substantial supplemental support to local recovery projects jointly funded by the State of Colorado, the Federal Emergency Management Agency, and the Federal Highway Administration.

Colorado is applying a risk and resilience based assessment process to identify projects that reduce risk and increase the resilience as communities continue to rebuild from the fires and floods.

Economic Revitalization

The 2013 floods and the 2012-2013 wildfires greatly impacted numerous Colorado businesses. In the canyons, floodwaters washed away motels and cabins, restaurants and stores. Damages to infrastructure disrupted business operations across the flood impacted area. In other communities, retail and commercial establishments suffered extensive damage or revenue losses. To address these impacts, the Colorado Office of Economic Development and International Trade (OEDIT) implemented three two economic recovery programs. The Recover Colorado Business Grant and Loan Program assists small businesses and non-profits that suffered substantial loss due to the floods. The Tourism Marketing Program assists non-profit and quasi-governmental entities to promote tourism and visitor related jobs, job retention and address the unique economic impact to the tourism economy. The Small Business and Workforce Development Program was originally designed to provide public service to employees in targeted industries that are in high demand in the impacted areas. However, this program is being closed due to low levels of demand and the current low unemployment rate in Colorado.

Agriculture

The Colorado floods and fires had a significant impact on agricultural businesses inundating an estimated 67,000 acres of farmland and grazing pastures resulting in significant crop loss, business interruption and physical damage. Agricultural losses from the 2013 floods alone were estimated to be $55 million.

Debris and silt covered what was once farmable pastureland and damaged equipment that was vital to their business operations. Livestock were stranded for days and some were lost in the flood or suffered severe health implications afterwards. Fences and corrals were washed away, hay and crops were destroyed and barns were completely demolished in some areas. To address these needs, the Agriculture Business Grant program has provided grants for working capital or construction costs to eligible businesses to assist them in recovering and restoring their business operations.

Planning

The floods and wildfires hit many communities hard, affecting not just homes, businesses and infrastructure, but the capacity of local governments to address both short and long-term response and recovery from these disasters. Communities are working to capitalize on the opportunity provided by disaster recovery funds to analyze their post-disaster realities, reexamine plans, rethink procedures, and revise codes in order to rebuild in a way that protects residents, economies, and local culture. Planning efforts include capacity building through local staffing, detailed studies and analysis of the affected watersheds and long-range comprehensive planning focused on resilient redevelopment. Early investments in planning have resulted in effective prioritization of recovery and redevelopment resources and the integration of resilience for the long-term.

Watershed Resilience

The floods and wildfires caused massive damage from watershed headwaters to streams. Disaster recovery often focuses on getting things back to “the way they were” as quickly as possible. However, an opportunity also presents itself to build back better, and more resiliently, than before. To help meet this, the Watershed Resilience Program, funded as a pilot program, was created. The program is a holistic, strategic initiative designed to provide watershed restoration, risk mitigation and community and economic development using a collaborative, coalition-of-partners approach. This program is designed with a multi-perspective approach that emphasizes the downstream impact of all adjacent decisions whether they are land use, transportation, or natural resources. This program prioritizes highly resilient restoration projects that utilize natural systems and natural design, have a minimal environmental footprint, and support conservation of water among other items, as well as multi-objective projects that address public safety, environmental and, in some cases, economic priorities simultaneously. Grants have already been awarded that are allowing watershed coalitions to hire staff to steer critical long-term restoration efforts. There are continuing needs to focus on capacity building, comprehensive and collaborative watershed planning, and project implementation to address long-term catalytic watershed system improvements, including over $623 million of estimated project implementation costs for 10 watershed coalitions.

Resiliency

Colorado communities have shown remarkable resilience in the face of recent disasters. Local governments, businesses, and individual Coloradans have made every effort to build back better, stronger and more resilient. In recognition of this resilience, and in the recognition of the need to apply lessons learned to minimize the impacts from future disaster events, the State integrated resiliency principles and criteria into each of the CDBG-DR programs identified in the Action Plan and subsequent Substantial Amendments. Additionally, the State of Colorado undertook the Colorado Resiliency Project which comprises of a robust public engagement process, as well as the Colorado Resiliency Framework. The Framework, which was adopted by Governor Hickenlooper on June 1, 2015, represents Colorado's long-term commitment and investment into a resilient future. The Framework also serves as a call to action and partnership, with the whole Colorado community to make a resilient future a reality in the face of future threats and changing conditions. The Framework and a snapshot of the public engagement process can be found on www.coloradounited.com/resiliency.

Colorado continues to work with local communities to provide funding to projects through infrastructure, housing, economic development, agriculture, planning, watershed and resilience CDBG-DR programs, based on stakeholder interest and demand, along with resiliency standards and local risk profiles. Continued collaborative input from stakeholders, including local communities, guided the obligation of all three allocations of CDBG-DR funding. The obligations, when timed correctly, allow for communities to leverage funds and help the State draw down the funds to communities who can spend funds within the required time frame set in the Federal Register.

The State of Colorado remains committed to supporting the full recovery of all communities impacted by the 2013 flood and wildfire disasters of 2012 and 2013. Colorado has made significant progress in these recovery efforts, leveraging economic resources from local communities, as well as federal, state, philanthropic and private sources. Ultimately, the important work of providing safe and secure housing, rebuilding stable infrastructure, securing resilient watersheds, revitalizing our impacted economies, enhancing quality of life for our residents, developing recreational experiences for our visitors, and rebuilding stable infrastructure are the byproducts of the important work detailed in this report.

Unmet Needs

Summary of Impacts to 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 5 days that neared totals for annual precipitation. Over 17 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.

Colorado has a history of facing challenges from natural hazards. For example, many of the small communities impacted by the 2013 floods are located in the wild land urban interface and are accustomed to taking preventive measures related to wildfire 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 or inland lowlands. Floodplain areas are narrower and steeper and are often co-located with transportation corridors. 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 impacted structures were not in the regulatory floodplain, as entire streambeds changed course and stream banks eroded. As the State continues to recover, elevating structures to one foot above the base flood elevation (BFE) on a mountain slope will have entirely different complexities than low-lying coastal areas on flat terrain. Colorado will continue to ensure that new construction and substantially rehabbed properties meet locally-adopted codes and the state's floodplain rules, which call for an elevation of one foot above BFE.

The State of Colorado has conducted three impact and unmet needs assessments since the 2013 floods. In each case, an interdisciplinary team engaged with local partners to evaluate needs across infrastructure, housing, economic, agriculture and watershed sectors. The final impact assessment of flood and wildfire-related damage is approximately $4.02 billion. The State has updated the unmet needs analysis to account for the progress made since 2015 and any additional resources that have been made available for the recovery process. The adjustment in identified unmet need since the submission of the original Action Plan is directly related to an updated understanding of infrastructure and watershed needs after additional survey, design and engineering work took place. As individual project scopes of work were further refined, the State identified additional needs in multiple infrastructure areas, including but not limited to communications, water, wastewater management, transportation and damaged public facilities. Furthermore, the State's watershed coalitions completed master plans that helped to crystallize project scopes and identify funding requirements that address disaster impacts and improve long-term resiliency. This progress also served to increase the overall unmet need identified. The State continues to work regularly with local partners to maintain a comprehensive and up-to-date understanding of unmet flood and wildfire recovery needs.

Table 1: Unmet Needs Progression

Colorado Unmet Need Type	Nov-13	Jul-14	Feb-15	May-17
Housing	**$476,070,547**	**$364,292,957**	**$302,715,957**	**$400,609,469**
Infrastructure	**$1,159,309,288**	**$670,499,780**	**$1,116,643,447**	**$900,933,851**
Economic Recovery	**$487,137,035**	**$453,465,876**	**$478,016,876**	**$494,171,048**
Watershed	**NA**	**NA**	**$477,823,598**	**$475,911,452**
Total	**$2,122,516,869**	**$1,488,258,613**	**$2,375,199,878**	**$2,271,625,820**

These fluctuations in the estimates listed above are largely a function of the progressive understanding of infrastructure impact. The Approved Action Plan used the best available data to identify more than $2 billion in infrastructure impact. However, conversations with reporting agencies between November 2013 and July 2014 helped to inform the State's understanding of impact, particularly in relation to areas not intended to be funded by CDBG-DR resources. In contrast, available project data from Public Assistance reporting has steadily increased as project scopes have been both completed and refined since the initial Action Plan submission. The result is an increase in funding needs from those areas which are critical to recovery and eligible for CDBG-DR assistance and a decrease in funding considerations for those areas which, while necessary to an overall return to normalcy, are not meant to be a focus of CDBG-DR resource allocation.

The State's examination of impact and unmet need is organized into four major categories: housing, infrastructure, economic recovery, and watershed. The unmet needs assessment contains data that the State compiled and analyzed from state, federal, and local stakeholders. Data sources included the Federal Emergency Management Agency (FEMA), the Small Business Administration (SBA), reports from civic organizations, and detailed surveys from local entities.

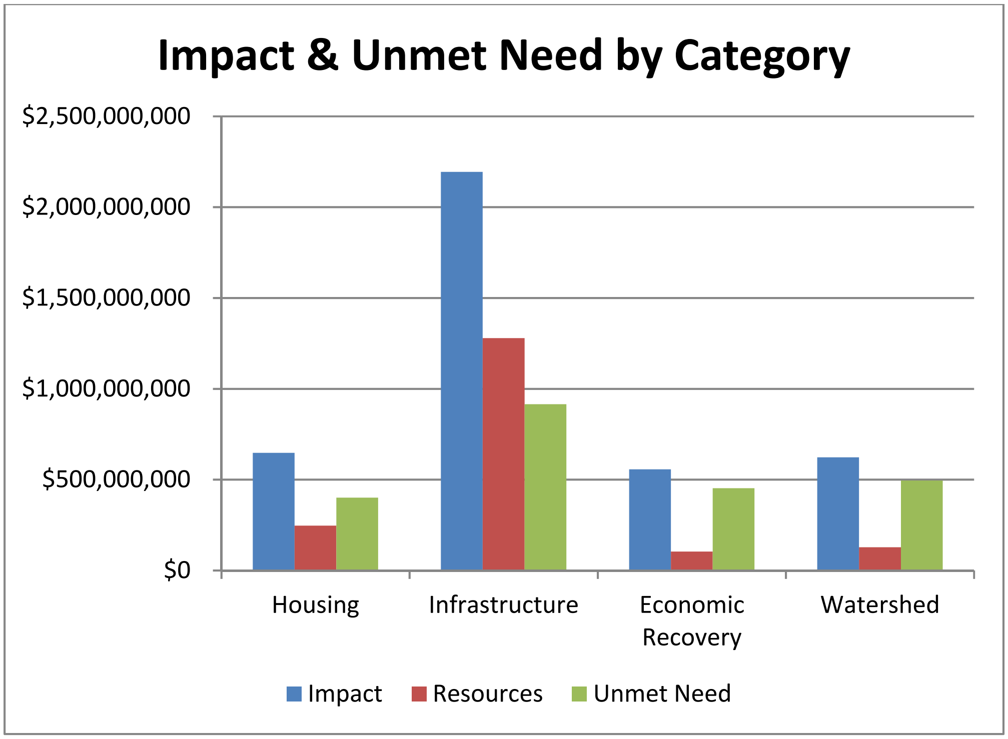
The unmet needs analysis represents a specific moment in time. As more information becomes available, and as critical recovery projects progress and costs evolve, the estimate of impact adjusts accordingly. As of May, 2017, the total estimated flood-related and fire-related impact to the State, as outlined in Table 2 below, is approximately $4.005 billion. The State has identified approximately $1.733 billion in resources allocated to assist recovery outside of CDBG-DR, yielding an unmet need of $2.246 billion.

Table 2: Impact & Unmet Need Summary

Type	Impact	Resources	Unmet Need
Housing	$647,270,619	$246,661,150	$400,609,469
Infrastructure	$2,179,624,745	$1,278,690,894	$900,933,851
Economic Recovery	$556,134,872	$61,963,824	$494,171,048

Type	Impact	Resources	Unmet Need
Watershed	$622,018,302	$146,106,850	$475,911,452
Total	**$4,005,048,538**	**$1,733,422,718**	**$2,246,722,437**

Figure 1: Unmet Need by Major Category



The infrastructure category yielded the largest amount of financial impact, allocation of recovery resources, as well as the largest amount of unmet need remaining to be addressed. This was followed by impact and remaining unmet need for the housing, watershed and economic sectors. Each of these categories will be discussed in detail in the following pages.

The State has identified and pursued private and public resources to leverage with CDBG-DR funding to optimize financial support to communities. The State has updated the accounting of resource allocations to reflect any new allocations of funding. Additionally, the State has removed CDBG-DR from this table to better reflect how CDBG-DR funding is meeting needs not addressed by other funding sources. Table 3 lists all identified Disaster Recovery Resources:

Table 3: Disaster Resources as of 4/15/17

Type	Housing	Infrastructure	Economic Recovery	Watershed	Total Resources
Small Business Administration Disaster Loans	$87,886,700	$0	$47,819,100	$0	$135,705,800

Type	Housing	Infrastructure	Economic Recovery	Watershed	Total Resources
FEMA Individual Assistance	$61,700,000	$0	$0	$0	$61,700,000
FEMA Hazard Mitigation Grant Program	$0	$42,227,785	$0	$0	$42,227,785
Emergency Watershed Protection Program – 2013 Floods (USDA NRCS)	$0	$0	$0	$69,700,000	$69,700,000
Emergency Watershed Protection Program – 2012 Fires (USDA NRCS)	$0	$0	$0	$18,331,850	$18,331,850
National Flood Insurance Program (FEMA)	$66,683,450	$0	$0	$0	$66,683,450
Federal Hwy Admin Emergency Relief	$0	$702,000,000	$0	$0	$702,000,000
FEMA Public Assistance	$0	$354,246,109	$0	$0	$354,246,109
Colorado Water Conservation Board Grants and Loans	$0	$0	$0	$47,205,000	$47,205,000
Emergency Forest Restoration Program	$0	$3,000,000	$0	$0	$3,000,000
Private/ Non-Profit Fundraising	$21,700,000	$0	$0	$0	$21,700,000
National Emergency Grant Program (USDOL/CDLE)	$0	$0	$4,600,000	$0	$4,600,000
Crisis Counseling Program (FEMA)	$5,700,000	$0	$0	$0	$5,700,000
Disaster Unemployment Assistance (FEMA)	$0	$0	$710,424	$0	$710,424
Drinking Water Revolving Loan Fund	$0	$0	$0	$2,000,000	$2,000,000
Project SERV (USDOE)	$0	$750,000	$0	$0	$750,000

Type	Housing	Infrastructure	Economic Recovery	Watershed	Total Resources
Private Well Testing Funds	$0	$0	$40,000	$0	$40,000
National Farm Aid	$0	$0	$10,000	$0	$10,000
Low-Income Weatherization Program (CEO)	$291,000	$0	$0	$0	$291,000
Emergency Conservation Program (USDA FSA)	$0	$0	$5,800,000	$0	$5,800,000
Federally Owned Roads Program (CDOT)	$0	$3,500,000	$0	$0	$3,500,000
Flood Assistance (OEDIT)	$0	$0	$2,984,300	$0	$2,984,300
Energy and Mineral Impact Program (DOLA)	$0	$11,200,000	$0	$0	$11,200,000
CDPHE/ Water Resources and Power Development Authority	$0	$0	$0	$2,000,000	$2,000,000
State Disaster Emergency Fund	$0	$111,000,000	$0	$0	$111,000,000
Outdoor Recreation Funds	$0	$167,000	$0	$0	$167,000
Energy Performance Contracting (CEO)	$0	$6,800,000	$0	$0	$6,800,000
HB14-1002 Grant (CDPHE)	$0	$16,800,000	$0	$0	$16,800,000
Great Outdoors CO	$0	$27,000,000	$0	$0	$27,000,000
Mapping of Natural Hazard Areas (SB 15-245)	$0	$0	$0	$6,870,000	$6,870,000
Disaster Case Management Program (FEMA)	$2,700,000	$0	$0	$0	$2,700,000
Total Resources	**$246,661,150**	**$1,278,690,894**	**$61,963,824**	**$146,106,850**	**$1,733,422,718**

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 household income is at or below 80% of the Area Median Family Income (AMFI) for the county.

Table 4: AMI of Destroyed Units

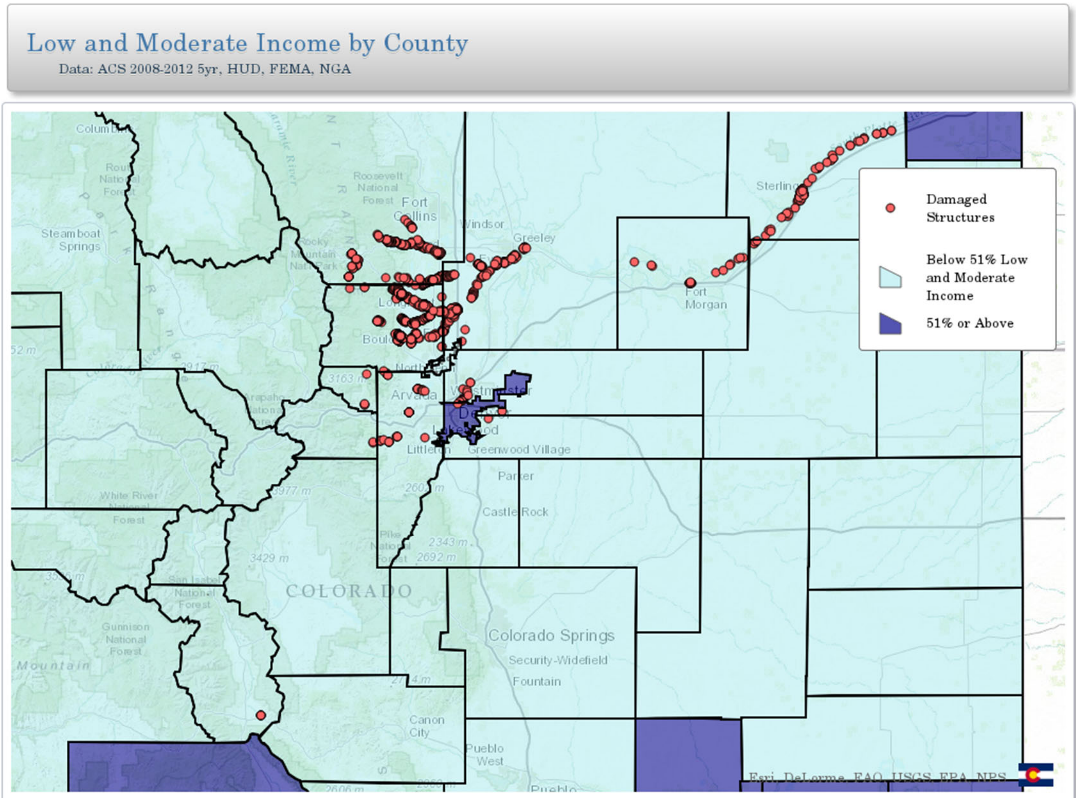
AMI of Destroyed Units (Source: FEMA FIDA 22345 mod3 11.26.2013)						
County	30%and Below AMFI	31% - 50% AMFI	51% - 80% AMFI	Greater Than 80% AMFI	Unreported	Destroyed Count
Boulder	27.5%	19.6%	13.7%	29.4%	9.8%	77
El Paso	100.0%	0.0%	0.0%	0.0%	0.0%	1
Larimer	39.4%	15.2%	18.2%	18.2%	9.1%	19
Morgan	100.0%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

Colorado will use at least 51% of its CDBG-DR funding to benefit LMI populations within the disaster-impacted areas of the State. The LMI percentages of those impacted counties are shown in Table 5 below.

Table 5: Low & Moderate Income by County ACS 2008-2012

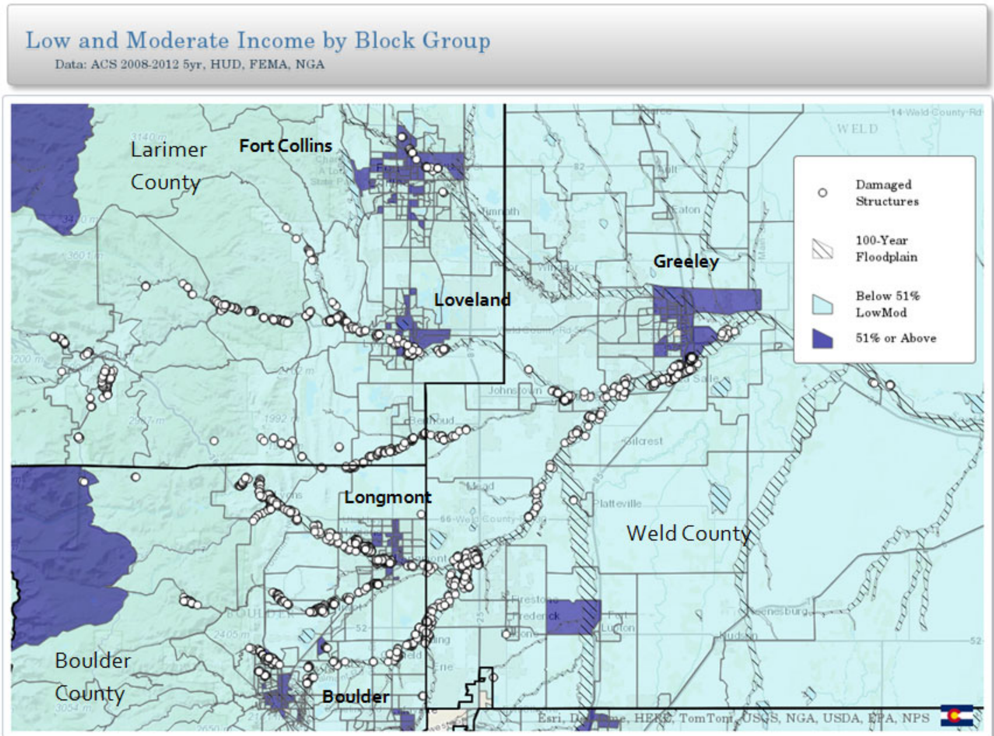
County	Low/Mod Percentage
Boulder	36.5%
Larimer	39.7%
Weld	41.0%
Adams	48.7%
Arapahoe	36.2%
Clear Creek	37.6%
Crowley	61.0%
Denver	54.8%
El Paso	38.5%
Fremont	43.6%
Gilpin	34.0%
Jefferson	32.4%
Lake	41.9%
Lincoln	47.2%
Logan	45.7%
Morgan	48.3%
Sedgwick	52.6%
Teller	37.1%
Washington	46.3%

Figure 2: Low & Moderate Income by County



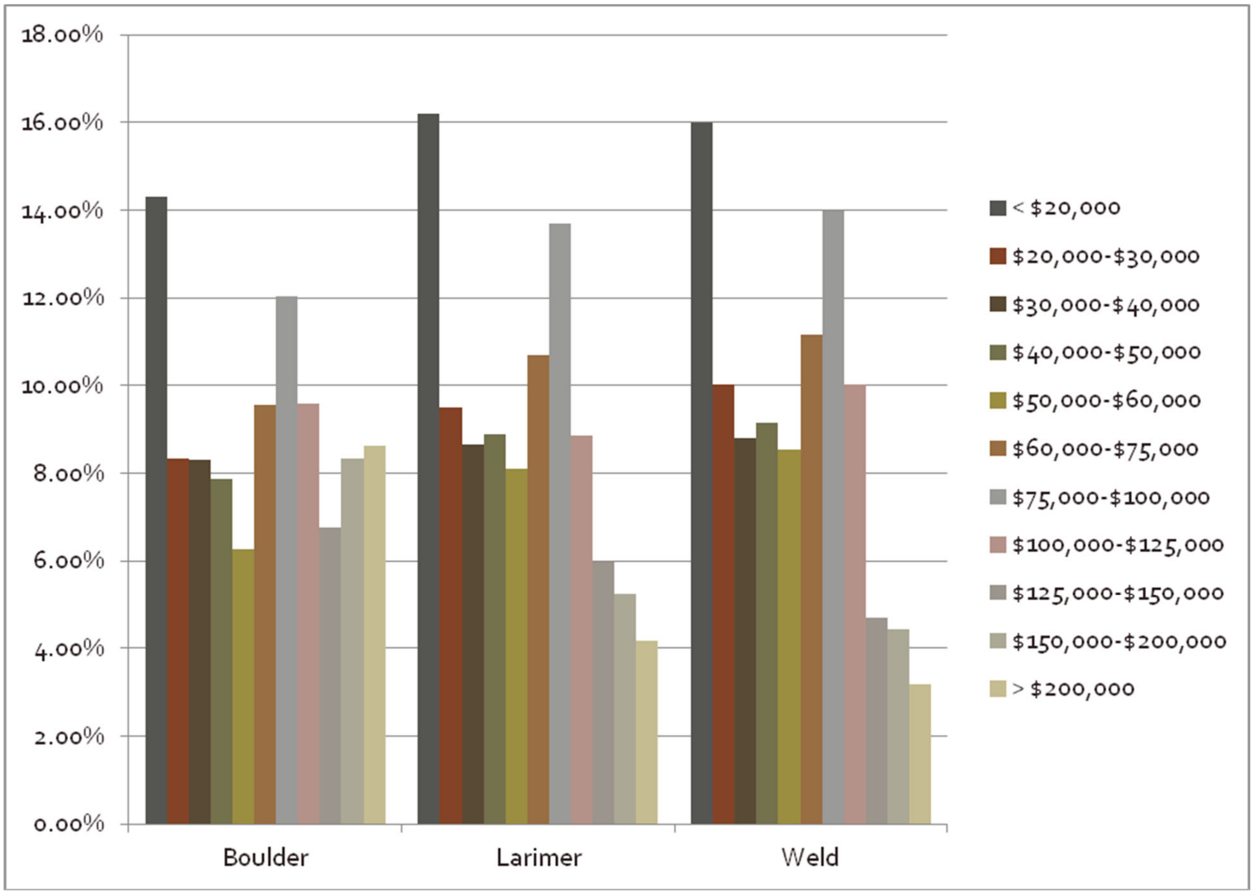
While the percentage of LMI households per county is below 51% for most counties, with the exception of Denver, each county has several census block groups that reflect a majority of LMI household populations as depicted in the map above. These block groups are located in proximity of the communities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

Figure 3: Low & Moderate Income by Block Group



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.

Figure 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 6: 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					

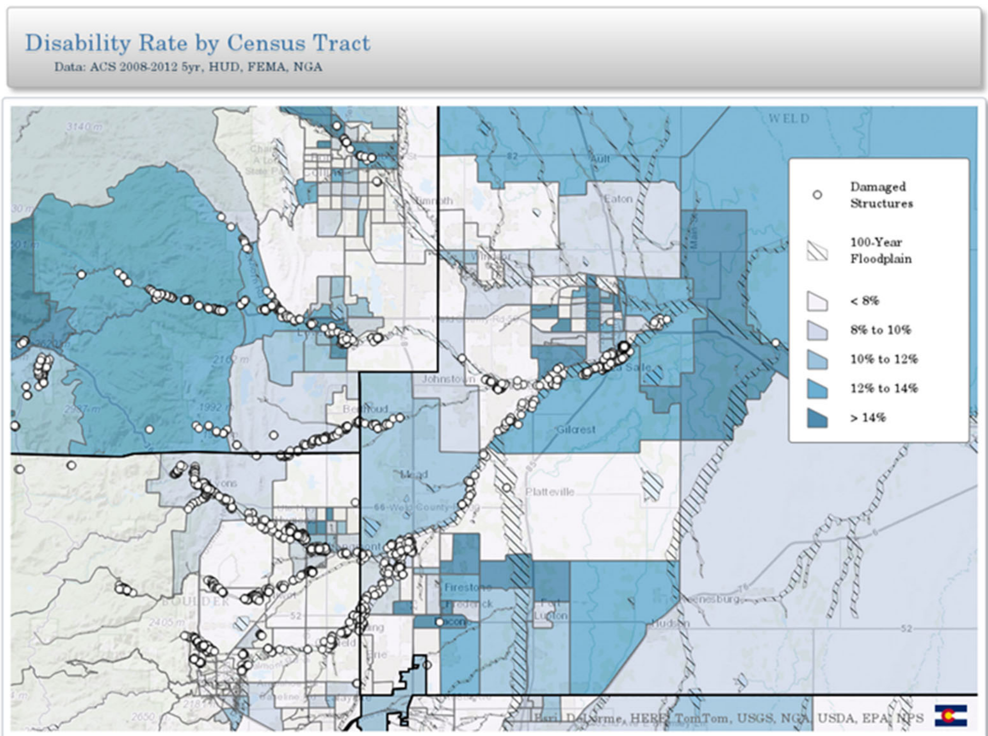
Impacts on Special Needs Populations

The floods affected households with special needs. The State has included priorities within CDBG-DR 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%, 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 7: Special Needs Population

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

Figure 5: Disability Rate by Census Tract



Housing Impact

The Housing impact of approximately $647 million is comprised of an estimated $625 million in flood-related damage to homes with a corresponding $22 million in flood-related damage to roads/driveways, bridges, and other crossings on private property. Fire-related damage is not included in the housing impact and unmet need calculation because the wildfire disasters did not qualify for Individual Assistance as a part of the corresponding presidential disaster declarations. As a result, there is insufficient information with which to calculate fire-related housing damage. The State recognizes that some homes may have been impacted by wildfire but not insured, such that they are not reflected in available insured loss data. The State's CDBG-DR housing programs have been made available to counties impacted by wildfire, regardless of the insured nature of impacted houses, and residents with uninsured wildfire loss are eligible to participate in CDBG-DR housing programs.

Funds typically available to assist with housing recovery include FEMA Individual Assistance, SBA, National Flood Insurance Program coverage, private insurance and non-profit assistance. Table 8 below outlines flood insurance claims related to the 2013 floods.

Table 8: National Flood Insurance Housing Claims

County	Total NFIP Claims Payments
Adams	$284,833
Arapahoe	$18,894
Boulder	$43,126,817
Clear Creek	$14,400
El Paso	$1,123,986
Fremont	$33,027
Jefferson	$878,834
Larimer	$11,623,196
Logan	$645,361
Morgan	$141,031
Weld	$8,793,021
Total	$66,683,450

Colorado utilized a housing impact multiplier consistent with the Calculating Unmet Needs section of Federal Register Vol. 78, No. 43, in order to account for potential gaps in housing damage information. The housing impact multiplier is a consideration not only for the extensiveness of the FEMA Individual Assistance inspection process, but also serves to account for those individuals who may not have applied for Federal disaster assistance or who were denied Federal disaster assistance.

The housing impact multiplier is based on the average value of the SBA award, which is calculated by dividing the total SBA 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, which is then applied to the total FEMA Verified Loss (FVL) as supplied by the FEMA Individual Assistance division. This yields a total estimated 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 awards for FEMA Individual Assistance, SBA, National Flood Insurance Program, and various smaller state and federal programs addressing household needs.

Table 9: Housing Multiplier

	Totals $	Units	Average
FVL	**$61,700,00**	**16,600**	**$3,716**
SBA	**$80,312,200**	**2,134**	**$37,634**
Multiplier			**10.11352799**
Housing Impact			**$624,970,619**

The housing impact for the 11 counties approved for FEMA Individual Assistance, as determined through the housing multiplier, is detailed in Table 9 above. The estimates above do not include the additional funding of $22.3 million needed for the Home Access Program, which have been incorporated into the overall housing impact and unmet needs assessment outlined at the end of this section.

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.

Table 10: Unmet Housing Need by County – Source: 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 experienced damage from the flooding or the complete destruction of their units. 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 11: Housing Impact Multiplier Allocated by County

County	Estimated Housing Damage	Estimated Assistance	Estimated Unmet Need	Percent of Unmet Need
Adams	$10,697,734	$5,516,091	$5,181,643	1.71%
Arapahoe	$29,255,897	$15,085,268	$14,170,628	4.68%
Boulder	$324,984,781	$167,572,455	$157,412,326	52.00%
Clear Creek	$2,534,974	$1,307,113	$1,227,861	0.41%
El Paso	$15,947,008	$8,222,783	$7,724,225	2.55%
Fremont	$596,647	$307,650	$288,997	0.10%
Jefferson	$15,307,261	$7,892,909	$7,414,352	2.44%
Larimer	$95,469,668	$49,227,187	$46,242,481	15.28%
Logan	$6,022,931	$3,105,614	$2,917,317	0.96%
Morgan	$877,897	$452,672	$425,226	0.14%
Weld	$123,275,818	$63,564,920	$59,710,899	19.73%
Total	**$624,970,619**	**$322,254,662**	**$302,715,956**	**100.00%**

Boulder, Larimer, and Weld counties continue to represent the highest amount of unmet need, making up 87% of the total unmet need. The column outlining "estimated assistance" above is derived from a housing multiplier. This does not account for the actual housing assistance provided, which is outlined in Table 12.

Table 12: Owner vs. Renter Damaged Units by County – Source: 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**

While wildfires were not declared for FEMA Individual Assistance, the State recognizes the ongoing housing need in fire-impacted communities. The number of housing units destroyed by wildfires is listed below in Table 13. Because of this impact, the State's disaster recovery housing programs are available to those Colorado residents affected by fire as well as by flood.

Table 13: Housing Units Destroyed by Wildfires[1, 2]

County	Wildfire	Units Destroyed	Insurance Claims[3]	Insured Loss
Larimer	High Park Fire	259	1,293	$113,700,000
El Paso	Waldo Canyon Fire	346	6,648	$453,700,000
El Paso	Black Forest Fire	489	4,173	$420,500,000
Total		1,094	12,114	$987,900,000

Impact on Homeowners

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 13,433 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 14.

Table 14: Damage Categories by FEMA Full Verified Loss (FVL) Designations – Source: FEMA IA

	Boulder	Larimer	Weld
Affected	7,279	1095	690
Minor	2,524	325	269
Major	607	95	236
Destroyed	77	19	199
Total	10,505	1,534	1,394

The majority of the residents who sustained damage from the flooding were homeowners. Approximately 10,780 homeowners' properties sustained some physical damage according to the FEMA Full Verified Loss data.

Table 15: 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	10,780	$181,168,335.65	$16,881,504.94	$198,049,840.59

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

Table 16: 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	2,511	$400,837.51	$8,473,227.49	$8,874,065.00

[1]Resource for destroyed units may be found at http://www.rmiia.org/catastrophes_and_statistics/Wildfire.asp

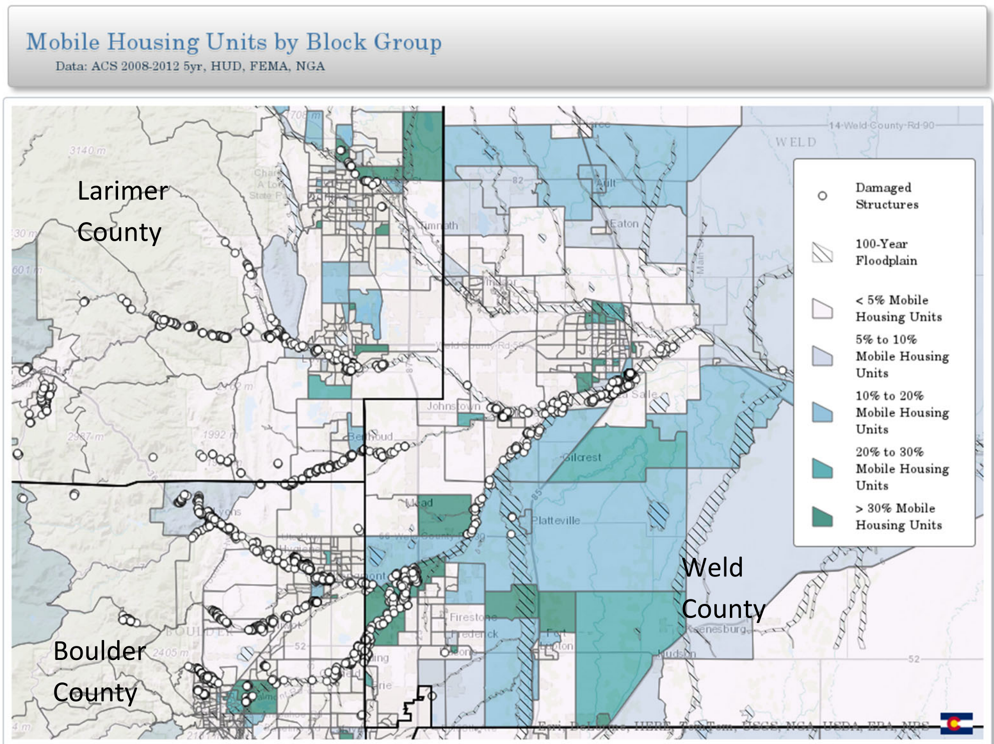
[2] Colorado experienced 4 presidentially declared wildfires. No homes were destroyed in the Royal Gorge fire.

[3] Insurance claims include both real and personal property.

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.

Figure 6: Mobile Housing Units by Block Group



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 17: Mobile Homes with FEMA Verified Loss or Destroyed

County	Destroyed	FVL
Adams		38
Arapahoe		2
Boulder	51	393
Clear Creek		3
El Paso	1	9
Fremont		10
Jefferson		17

County	Destroyed	FVL
Larimer	**32**	**50**
Logan		**26**
Morgan	**1**	**6**

Home Access Impact

The severe flooding damaged or destroyed bridges, culverts and access roads necessary for households to access their homes or for emergency vehicles to respond in the event of future disasters or medical emergencies. These damages were significant, particularly within those counties along the foothills where fast moving water wreaked havoc on both public and private crossings, particularly in the counties of Boulder and Larimer. Preliminary estimates have been revised based on demand identified through local agencies. Project costs can vary significantly from about $15,000 for a simple culvert repair up to more than $450,000 for significant bridge work over major crossings. Estimates by county of demand for Home Access are as follows:

Table 18: Estimated Home Access Impact

County	Estimated Number of Projects	Estimated Dollar Amount
Boulder	66	$13,100,000
Larimer	43	$6,500,000
Balance of State	17	$2,700,000
Total	**126**	**$22,300,000**

Public and Assisted Multi-Family Housing Impact

The damage to federally funded housing, including HUD-assisted multifamily housing, low income housing tax credit financed developments, and other subsidized and tax-credit assisted affordable housing was spread across the impacted communities; however, the overall damage in this category 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. Public housing and homeless shelters received minimum damage because they were built in low-risk areas.

Two rental housing developments in Boulder County received damage: one Section 8 housing development and one senior assisted living development. Alvarado Village sustained moderate damage to crawl spaces, including furnaces and water heaters. Repairs and replacements were handled quickly and no residents were displaced. One development in Adams County received moderate damage. Tenants of five units were temporarily displaced due to either an inch of standing water (two units), or roof leaks (three units). Those tenants returned to their units following swift cleaning and repairs. Bloomfield Place is an eight-unit senior assisted-living development. It received direct damage from the flooding. Its utilities were disabled and its residents were evacuated. The residents were displaced for a temporary period, but all have since returned permanently to 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 who 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 return to their units.

The State reached out to housing agencies through phone calls and damage surveys in order to determine the impact to public housing. The State also obtained a list of impacted properties from HUD. The State contacted each property that was impacted to assess any remaining damage and corresponded with both property management, and in some cases, property owners. In each instance, property repairs had been completed and all residents of the publicly assisted housing had returned to their housing prior to the contact made by the State.

The most heavily impacted communities also have the tightest housing markets in the State. The tight market conditions continue to challenge Housing Choice Voucher holders, and some recipients remain in temporary housing waiting for permanent solutions. In the early fall of 2014, each of the three most heavily impacted counties implemented a CDBG-DR funded Temporary Rental Assistance and Relocation program to serve households displaced by the floods. This program provides financial assistance to households not able to secure permanent affordable housing prior to the culmination of their FEMA-funded Temporary Housing Assistance (Individual Assistance) allowance, as well as to fund the temporary housing costs for homeowners and renters whose damaged homes must undergo rehabilitation or reconstruction prior to their permanent return. A number of the lower-income renter households impacted by the floods were able to eventually transition smoothly to Section 8 Housing Choice Vouchers, with the Temporary Rental Assistance and Relocation program filling the gap in their housing costs while the households made their way through the Section 8 program waiting lists.

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 10 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 worked 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 continues to ensure that Fair Housing is appropriately addressed in disaster recovery. Stakeholder meetings were 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, particularly 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 any 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 continue to 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, particularly in its efforts to replace mobile homes.

Of the $647 million in impact, the State has identified an estimated $246.6 million in resources, resulting in remaining unmet need of $400.6 million as outlined in Table 19 below.

Table 19: Housing Unmet Need

Type	Impact	Resources	Unmet Need
Housing	**$647,270,619**	**$246,661,150**	**$400,609,469**

Infrastructure Impact

More than 485 miles of road were damaged and/or destroyed and shoulders were washed away from roadside-ditch flowing water. Concrete curbs, gutters, sidewalks and asphalt were also damaged, making access to homes or communities dangerous or impossible immediately after the floods. 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 11 weeks in Boulder County.

Figure 7: Damage to Hayden Court, Longmont (Source: Survey)

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. Similarly, the damage to critical waterways includes a combination of public and private properties. 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 dealt with significant debris issues. 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, erosion and debris flooding implications in the near and long-term as snowmelt and future heavy rain events run downriver and encounter course-changing obstacles and blockage.

Many of the communities in the impacted area continue experiencing extreme fiscal constraints 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 millions of dollars. Funds typically available to assist with infrastructure recovery include FEMA, private insurance and non-profit assistance.

The State of Colorado conducted a thorough analysis of infrastructure impacts in cooperation with federal and local partners. The table below reflects current estimated infrastructure impacts, based on analyses in the original Action Plan and subsequent amendments, updated evaluations to recovery programs in May of 2017, and the addition of estimates based on the wildfires of 2012 and 2013. The FEMA Public Assistance and the federal aid highway project costs have been updated to current estimates:

Table 20: Estimate of Infrastructure Impact

Description	Total Projected Project Costs
FEMA Public Assistance Category C-G Floods (DR 4145)	$378,680,524
FEMA Public Assistance Category C-G Wildfires (DR 4134)	$4,329,545
Estimated FEMA Ineligible Costs at 25%	$95,752,517
HMGP Notices of Intent	$262,312,000
Impacts to Federal Aid Highways	$743,000,000
Other Infrastructure needs identified by various State/ Local Agencies	$695,550,159
Total	**$2,179,624,745**

Other infrastructure needs include a range of recovery and resiliency actions, including, but not limited to:

- Hardening or replacement of infrastructure not eligible, or funded, through other programs
- Acquisition of flood and landslide damaged or at-risk structures
- Risk reduction projects, including detention ponds, flood control structures and channel improvements
- Dry or wet flood-proofing of structures, including historic structures
- Installation of stream gauges and flood warning systems

The state and local match for FEMA PA and HMGP is 25% plus any costs incurred that are subsequently deemed ineligible. The state and local match for FHWA local-aid roads is approximately 20%. The cost share requirements, additional costs, plus additional recovery projects identified by our local partners represent a significant unmet need in excess of $1 billion.

Figure 8: Volunteer fire department in Jamestown damaged from flooding.

Of the almost $2.2 billion impact, the State has identified an estimated $1 billion in resources, resulting in remaining unmet need of $900 million as outlined in Table 21 below.

Table 21: Infrastructure Unmet Need (Flood-Related Damage)

Type	Impact	Resources	Unmet Need
Infrastructure	**$2,179,624,745**	**$1,278,690,894**	**$900,933,851**

Watershed Impact
During the 2013 flood event, a number of stream-reaches experienced flood episodes equaling or exceeding a 100-year stream flow event. In addition, the long duration of the event and the high velocity floodwaters carrying large debris loads resulted in heavy erosion, channel migration, and damage or destruction of riparian ecosystems, greenways, parkland and open space, as well as public and private property. To evaluate impacts, identify needs and prioritize projects, 10 watershed coalitions developed watershed master plans, which serve to guide implementation of high priority restoration needs across disaster impacted areas. Estimates from the watershed coalitions and the watershed master planning process indicate a $594,320,702 impact across flood impacted watersheds.

Wildfires have increased the likelihood of flooding, debris flow and soil erosion in watershed areas. Residents in watershed areas impacted by wildfire continue to live with an ongoing risk of flood and debris flow. Once the integrity of the watershed natural infrastructure is compromised, even a moderate precipitation event presents a high risk scenario for residents and public infrastructure. Furthermore, residents are also at risk for a reduction in drinking water quality. Finally, wildlife and park areas report moderate impact to indigenous flora species due to soil changes brought on by wildfires. Without a response, this increases the risk of invasive species taking root and altering the ecological systems in place.

In 2012, USDA Natural Resources Conservation Service, in cooperation with other Burned Area Emergency Response (BAER) team members, conducted field surveys, performed modeling, and conducted analyses in an effort to identify projects. As a result, damage survey reports for both Waldo Canyon Wildfire and High Park Wildfire were developed. Based on this process, the estimated total project costs and funding sources for wildfire restoration projects is $27,967,600.

The estimated combined impact of floods and wildfires to watersheds is $622.01 million total impact, an estimated $146.1 million in resources have been made available, for a resulting Unmet Need of $475.9 million as outlined in Table 22 below.

Table 22: Watershed Unmet Need

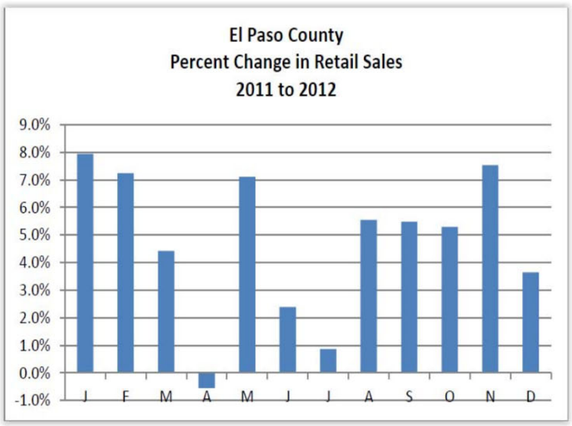
Type	Impact	Resources	Unmet Need
Watershed	**$622,018,302**	**$146,106,850**	**$475,911,452**

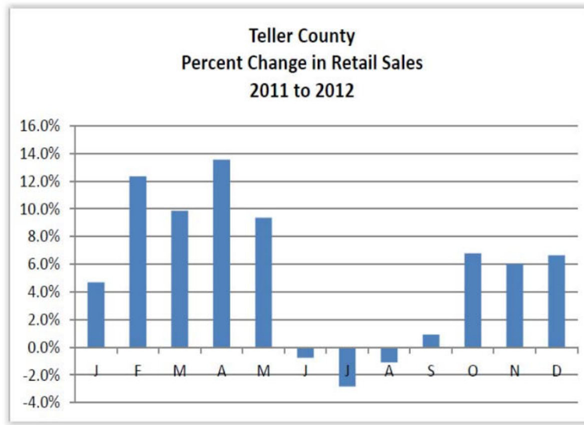
Economic Impact
The economic impact category includes many different types of business and employment losses including, but not limited to, direct damages, loss of revenue and loss of jobs. The State also evaluated

impact to the agriculture, tourism, and oil and gas sectors. In addition to small businesses, the floods and fires impacted many individually-owned and home-based businesses.

The impact of the wildfires was particularly pronounced in municipalities where retail activity is concentrated. For example, Colorado analyzed retail sales data for the Cities of Colorado Springs, Manitou Springs, and Woodland Park, and El Paso and Teller Counties for impacts from the June 2012 Waldo Canyon Fire. Overall, in the months prior to the Waldo Canyon Fire, these communities were experiencing significant retail sales growth rates from the prior year. During and immediately following these incidents, retail activity either drastically slowed or fell into negative territory as retail sales declined from the prior year.

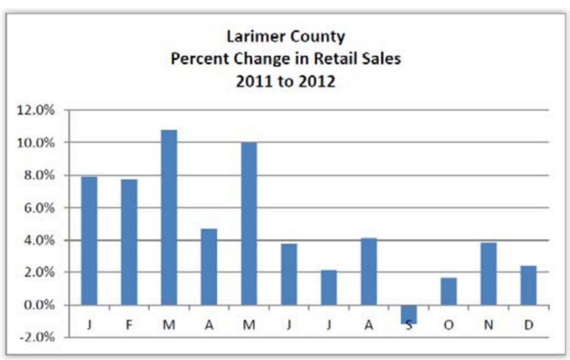
Figure 9: El Paso & Teller County Percent Change in Retail Sales 2011 to 2012





The June 2012 High Park Fire negatively affected retail sales in the City of Fort Collins and elsewhere in Larimer County. Fort Collins saw a sharp drop in retail sales growth rates in June 2012, which continued through most of the year. While less pronounced than that of Fort Collins, Larimer County's retail sales showed a similar trend in June, as well.

Figure 10: Larimer County Percent Change in Retail Sales 2011 to 2012



Business & Employment Impact

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 this 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.

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 Table 23 below, 503 impacted area businesses have received $47,819,100 in Small Business Loans to date. This data is one of the many factors that reflect the impact the September 2013 floods had on the local economy.

Table 23: SBA Business Loans by County as of 4/15/17

County	Number of Businesses	Loan Amount
Boulder	269	$20,271,400.00
Larimer	143	$22,176,300.00
Weld	23	$1,207,800.00
Adams	5	$93,900.00
Arapahoe	20	$1,804,400.00
Clear Creek	1	$29,6000
Denver	1	$13,400

County	Number of Businesses	Loan Amount
El Paso	25	$1,479,900.00
Grand	1	$81,700.00
Jefferson	8	$463,000.00
Logan	6	$179,200.00
Teller	1	$18,500
Total	**503**	**$47,819,100.00**

The assessment of economic impact remains at $556 million, consistent with the original Action Plan submitted in February 2014.

Of the $556 million total impact, an estimated $61.9 million in resources have been made available, for a resulting Unmet Need of $494 million as outlined in Table 24 below.

Table 24: Economic Recovery Unmet Need

Type	Impact	Resources	Unmet Need
Economic Recovery	**$556,134,872**	**$61,963,824**	**$494,171,048**

Tourism

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 and ground).

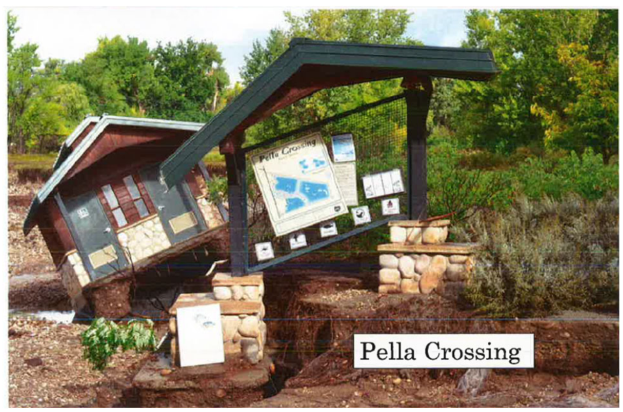
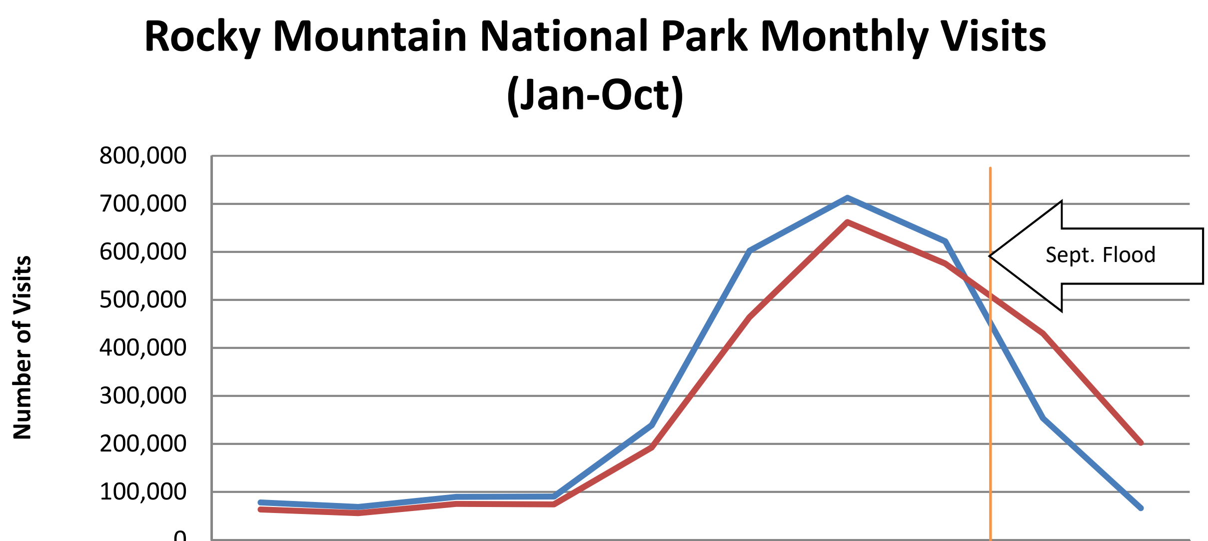


Figure 11: Pella Crossing, Boulder County

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% from 2012, and the number of October visitors was down a staggering 70% 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 million in documented lost park fees, or the reduced visitor travel in November 2013 and after.

Figure 12: 2013 Visits to RMNP



	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 averaged, 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)
- 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).

- Summit Economics also 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%, the result is $4.466 million in tax revenues for the State of Colorado.

Estimated Need by County

An assessment of unmet need by county was conducted in order to validate the initial Most Impacted County estimates by HUD and assist in validating that the distribution of funds is relatively proportional to the damages. In the second and third Substantial Amendments, the State updated county impact percentages in consideration of updated FEMA Public Assistance project data. Based on that data, the State estimates Boulder County combined housing and infrastructure impact at 50%, Larimer County's combined housing and infrastructure impact at 19% and Weld County's combined housing and infrastructure impact at 13%. The balance of state's estimated housing and infrastructure impact is 18%. The percentage of estimated impact by county for Housing and Infrastructure programs are listed in Table 25 below.

Table 25: Percentage of Housing and Infrastructure Impact by County

County	Housing & Impact Percentage	Infrastructure Impact Percentage	Housing & Infrastructure Impact Percentage
Boulder	52%	48%	50%
Larimer	15%	22%	19%
Weld	20%	8%	13%
Other	13%	22%	18%
Total	**100%**	**100%**	**100%**

Method of Distribution

Overview

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. FEMA and SBA damage assessments, as well as surveys distributed to local community stakeholders informed the State's initial funding strategy. The State incorporated the needs of communities impacted by the 2012 and 2013 Wildfires in the first Substantial Amendment. In the second Substantial Amendment, the State incorporated additional impact information related to infrastructure and watersheds, which further informed the State's funding strategy.

During the development of the original Action Plan and each Substantial Amendment, the State presented impact and unmet needs information at stakeholder and public meetings, and webinars, and the State fine-tuned the distribution strategy in response to comments submitted by local agencies and survivors of the flood and fires. The results were approved by HUD and published as Substantial Action Plan Amendments.

The distribution approach outlined below attempts to balance the complex needs of impacted communities, as well as considerations for over-subscribed programs, and allocates accordingly to promote a resilient long-term recovery. Although the unmet needs far exceed the resources available, the programs described in this plan are designed to maximize support for the remaining 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.

The State's method of distribution reflects a balance between meeting immediate housing, family and household needs and longer-term infrastructure and watershed restoration and resiliency needs. Early in the recovery process, the State prioritized housing resources and immediate needs to ensure suitable housing was available to impacted residents through household assistance and new construction programs. The State dedicated 45% of the first allocation of $62.8 million to housing and 35% to infrastructure. With the second and third allocations, the State made additional commitments to longer-term infrastructure and watershed projects. As indicated below, the final allocation of funding for the entire $320 million allocation has 32% going to housing and 49% going to infrastructure and watershed projects, including enhancements for long term resiliency.

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--small business, tourism and agriculture, respectively--receive the assistance they need to keep businesses open, residents employed, and the tax coffers full. Assistance to businesses is primarily provided through grants. Additional resources have been dedicated to building economic resiliency through business technical assistance programs that will enhance business preparedness, the competitiveness, and the viability of impacted businesses. These programs are also designed to assist the impacted areas in meeting the increased demand for recovery work.

Finally, the State of Colorado strategically funded planning initiatives that would heavily inform construction priorities and strongly incorporate resilience measures to reduce damages from future disasters. In addition to statewide and local planning and capacity building, the State also consolidated environmental reviews to gain efficiencies, provide capacity to local stakeholders and reduce duplicative efforts, particularly in and around our waterways.

Projected Funding by County

The State recognizes that impacted communities need certainty around the amount of recovery funds specifically directed to their communities. Although the State must direct 80% of the total CDBG-DR allocation to the three most impacted counties - Boulder, Larimer and Weld - the State has provided additional certainty by projecting the programmatic breakdown of the 80% of funds based on the percentage of damage.

Through Substantial Amendments 1 and 2, the State projected funding amounts in the infrastructure and housing categories for use by eligible applicants within the three most impacted counties. The specific projections are based on the percentage of impact in the individual counties. The State determined the percentage of impact using FEMA Individual and Public Assistance data. There will be some slight variance from these targets based on applications received for funding and the ability of programs and projects to fully expend their allocations. These targets conform to the State's mandated requirement in FR-5696-N-07 to expend a minimum of 80% of CDBG-DR funds in the designated Most Impacted Counties of Boulder, Larimer and Weld. Each program has specific targets at the program level to ensure not more than 20% of funds go outside of these designated counties.

Table 26: Percentage of Housing & Infrastructure Impact by County

County	Housing Impact Percentage	Infrastructure Impact Percentage	Housing & Infrastructure Impact Percentage
Boulder	52%	48%	50%
Larimer	15%	22%	19%
Weld	20%	8%	13%
Other	13%	22%	18%
Total	**100%**	**100%**	**100%**

The total funding allocations for use in each county for Housing and Infrastructure programs are listed in Table 27 below. The administrative approach for these funds is for the State to administer the projects directly. However, Substantial Amendments 1 and 2 provided the opportunity for sub-allocation requests to be made within Boulder, Larimer, or Weld counties. Requests must be made by a coalition of local governments, municipalities and stakeholders within each county geographical area. Approval of a sub-allocation request by the State allows a county-based coalition administrative authority for the

Household Assistance and Infrastructure Programs. Housing Construction Programs are included in the overall funding projection per Table 27; however the application process will continue to be administered by the State in accordance to the original Action Plan. At the State's discretion a sub-allocation request may also redistribute funding between Household Assistance Programs and Infrastructure programs for the second and third allocations of funding within the county geography. Additionally, for the third allocation only participants in the sub-allocation process may request to redistribute Housing New Construction funding to other housing or infrastructure programs if they can substantiate the need and meet Low to Moderate Income requirements within the county geography.

The State will evaluate sub-allocation requests based on a county coalition's ability to demonstrate:

- Its understanding of unmet need within the county geography
- Its capacity to administer CDBG-DR programs in accordance with the State's HUD-approved financial controls
- Its ability to serve all of the impacted populations within the county geography
- Its outreach and public information process and activities
- How its proposed programs serve the HUD National Objectives and State program goals outlined in the approved Action Plan and amendments

The State allows this option provided that a jurisdiction is able to demonstrate significant local citizen representation and participation in the sub-allocation process. The jurisdiction is required to submit its own needs assessment and action plan in order to demonstrate to the State a local understanding of need and the strategies to address that need while meeting national objectives. The Housing New Construction, Economic Revitalization, Agriculture, and Planning and Resiliency and Watershed Resiliency Pilot programs continue to be managed by the State.

County and local governments within Boulder County opted to form a collaborative, referred to as the Boulder County Collaborative (BCC) to manage their own housing assistance and infrastructure programs as a sub-grantee. They selected the City of Longmont to act as fiscal agent and grant manager. Under this arrangement, BCC received a sub-allocation of 48% of infrastructure dollars and 52% of housing dollars based on the identified impact percentages. This sub-allocation was formalized in the State's Substantial Action Plan Amendment 3, approved by HUD on December 2, 2015. As further described in the method of distribution, the percentages in Table 27 establish the basis for their sub-allocation.

Table 27: BCC Sub-allocation (Round 2)

Program	State Allocation	% Boulder	$$ Boulder
Household Assistance	$23,415,800	52%	$12,176,216
Home Access	$4,000,000	52%	$2,080,000
Infrastructure	$64,677,000	47%	$30,398,190
Sub-allocation			$44,654,406
Less transfer to Larimer County*			($1,000,000)
Total Sub-allocation to Boulder County Collaborative			**$43,654,406**

*This table reflects the BCC initial allocation from Substantial Amendment 3 and does not include additional funds from subsequent amendments. As described in Substantial Amendment 3, Boulder transferred $1M to Larimer County in exchange for $1M in Round 1 funds.

In Substantial Amendment 3, the State also re-purposed $3 million of Economic Development funding to Infrastructure funding based on apparent demand. According to the county allocation methodology, the State allocated $1.41 million of those funds (48%) to the BCC allocation, bringing the total to $45,064,406.

The Boulder County Collaborative selected the City of Longmont as the managing agent and fiscal entity for the BCC sub-allocation. Substantial Action Plan Amendment 3 provided the Collaborative with the proportionate share of Round 2 funding, which equated to $45,064,406. Substantial Action Plan Amendment 5 further allocated the remaining Round 3 dollars using the previously approved methodology, which provided the Boulder County Collaborative with an additional $20,522,213.

This Substantial Amendment transfers 50% of the re-allocated Economic Development funds to the Collaborative in the amount of $7,183,700. The Collaborative will prioritize $200,000 for planning activities and the balance of $6,983,700 for unfunded infrastructure priorities. In the area of housing, Boulder County had an estimated 52% of the damages, but received only 48% of the housing resources between Household Assistance and Housing Construction. The transfer of $3,600,000 from the Division of Housing (DOH) to the Collaborative provides additional recovery resources to this most impacted county consistent with damage estimates. In order to provide additional expertise and resources to the property acquisition and affordable housing development in the Town of Lyons, the Collaborative is transferring $4,000,000 to DOH for the management and facilitation of this project. A summary of total funding for the Boulder County Collaborative is below:

Table 28: Total Funding Allocation for the Boulder County Collaborative

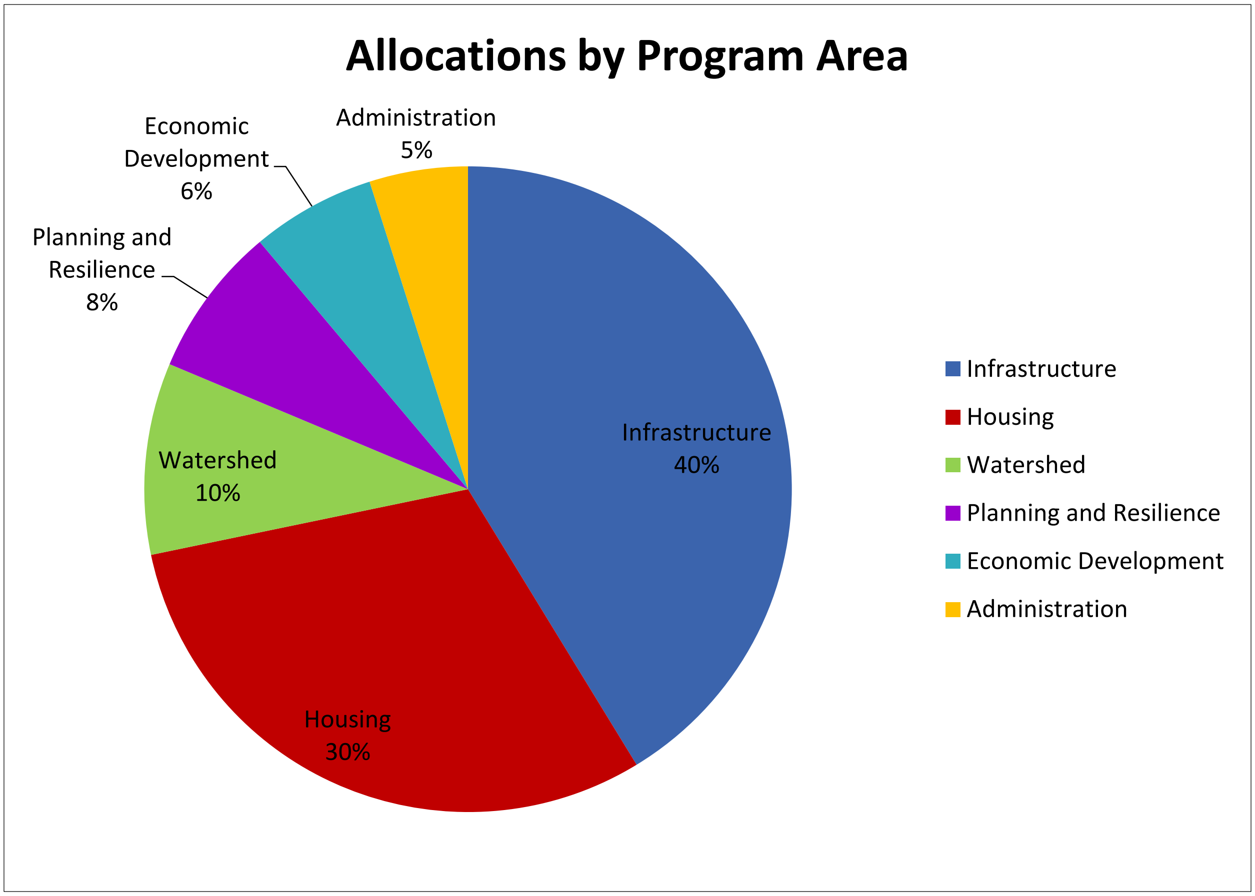
Allocation	Household Assistance	Housing New Construction	Infrastructure	Planning	Total
Initial Funding (SA3)	$13,256,216.00		$30,398,190.00		$43,654,406.00
Add'l demand-based funding (SA3)*			$1,410,000.00		$1,410,000.00
Third Allocation Funding	$4,078,534.00	$5,582,186.00	$10,861,492.00		$20,522,212.00
Substantial Amendment 6.0	($1,308,166.00)	($5,582,186.00)	$13,474,052.00	$200,000.00	$6,783,700.00
Non-substantial Amendment 6.4	($805,680.09)		$898,529.41	($92,849.32)	$0.00
Non-substantial Amendment 6.5			$500,000.00		$500,000.00
Substantial Amendment 7.0			$1,200,000.00		$1,200,000.00
Non-substantial Amendment 7.1	($3,776,128.66)				($3,776,128.66)
Non-substantial Amendment 7.2	($362,445.52)		$362,445.52		$0.00
Non-substantial Amendment 7.3			$2,837,345.70		$2,837,345.70
Non-substantial Amendment 7.4			$565,211.22		$565,211.22
Non-substantial Amendment 7.5	($279,916.56)		$279,916.56		$0.00
Total	**$10,802,413.17**	**$0.00**	**$62,787,182.41**	**$107,150.68**	**$73,696,746.26**

*The majority of the $1.41 million additional allocation was credited to Round 1 funding to help the State meet its April 2016 spending deadline.

Projected Funding by Program

Figure 13 below indicates the current distribution of the $320.346 million CDBG-DR grant in total. This distribution by allocation and program accounts for all Substantial and Non-Substantial Amendments and all re-allocations associated with meeting the appropriate timeframes of each obligation request.

Figure 13: Allocation Percentage of All CDBG-DR Funding



Allocations within specific activities within programs have evolved over time to account for updates in the unmet needs assessment and program demand. Similarly, specific criteria within programs have evolved over time to streamline program administration and to address the unique needs associated with the floods and wildfires.

Table 29: CDBG-DR Allocation by Program

Allocations AP Version 7.5				
Housing	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
Household Assistance	$ 7,614,395	$ 15,642,519	$ 2,845,895	$ 26,102,808
New Construction	$20,894,377	$ 34,341,658	$ 5,433,713	$ 60,669,748
Subtotal	$28,508,772	$ 49,984,176	$ 8,279,608	$ 86,772,556
Infrastructure	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
Recover Colorado Program	$21,067,600	$ 33,305,500	$ 15,075,327	$ 69,448,427
Watershed Implementation and Ditch		$ 25,187,000	$ 5,524,198	$ 30,711,198
Subtotal	$21,067,600	$ 58,492,500	$ 20,599,524	$ 100,159,624
Economic Recovery	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
Recovery Colorado Business Grants/Loans	$ 4,765,160	$ 3,847,099	$ 1,070,000	$ 9,682,259
Tourism Marketing	$ 500,000	$ 676,512	$ 91,788	$ 1,268,300
Subtotal	$ 5,265,160	$ 4,523,611	$ 1,161,788	$ 10,950,559
Agriculture	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
Agriculture Business Grants	$ 2,286,153	$ 6,633,847		$ 8,920,000
Planning and Resilience	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
Planning and Resilience	$ 1,000,000	$ 14,627,000	$ 854,074	$ 16,481,074
Watershed Planning and Capacity Building		$ 4,912,948	$ 394,202	$ 5,307,150
State Environmental Reviews	$ 900,000	$ 1,165,000	$ 250,000	$ 2,315,000
Subtotal	$ 1,900,000	$ 20,704,948	$ 1,498,277	$ 24,103,225
Boulder County Collaborative Sub-	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
BCC Household Assistance		$ 9,603,969	$ 1,198,444	$ 10,802,413
BCC Infrastructure	$ 1,073,274	$ 39,802,124	$ 21,911,785	$ 62,787,183
BCC Planning			$ 107,151	$ 107,151
Subtotal	$ 1,073,274	$ 49,406,093	$ 23,217,380	$ 73,696,747
Administration	**Allocation 1**	**Allocation 2**	**Allocation 3**	**Total Allocation**
BCC-Admin		$ 1,514,381	$ 736,521	$ 2,250,902
State Admin	$ 2,699,042	$ 8,040,443	$ 2,752,902	$ 13,492,387
Subtotal	$ 2,699,042	$ 9,554,824	$ 3,489,423	$ 15,743,289
TOTAL	$62,800,000	$199,300,000	$ 58,246,000	$ 320,346,000

Projected Outcomes

At the time of this consolidation of the State's original Action Plan and subsequent amendments, the programs described herein are well under way and the State has expended approximately 80% of the full allocation of $320 million. All funds are allocated to specific program areas based on the State's unmet needs assessment. The outcomes completed to date and anticipated outcomes of these programs are as follows:

Table 30: Projected Program Outcomes

Program	Outcomes as of 10/31/2019	Projected Outcomes
Household Assistance*		
Housing Rehabilitation	182 Homes	187 Homes
Temporary Rental Assistance	111 Households	112 Households
Down Payment Assistance	24 Households	24 Households
Clearance & Demo	43 Properties	43 Properties
Home Access	75 Projects	92 Projects
***Includes DOH and BCC managed programs**		
Housing New Construction	992 Units	1114 Units
Infrastructure		
Infrastructure Program	96 Projects	108 Projects
Watershed and Ditch Implementation	38 Projects	40 Projects
BCC Infrastructure	28 Projects	39 Projects
Economic Development		
Business Grants and Loans	223 Business Grants	223 Business Grants
Tourism Grants	17 Tourism Grants	17 Tourism Grants
Agriculture Grants	66 Agribusiness Grants	66 Agribusiness Grants
Planning Grants		
Local Planning Grants	71 Planning Projects	74 Planning Projects
Planning Capacity Grants	21 Capacity Grants	21 Capacity Grants
Watershed Capacity Grants	19 Capacity Grants	19 Capacity Grants
BCC Planning Grant	4 Planning Projects	4 Planning Projects

The projected outcomes are based on current demand and funding availability and are subject to change as the programs evolve due to revised demand estimates, individual project costs and local priorities.

Administrative Design

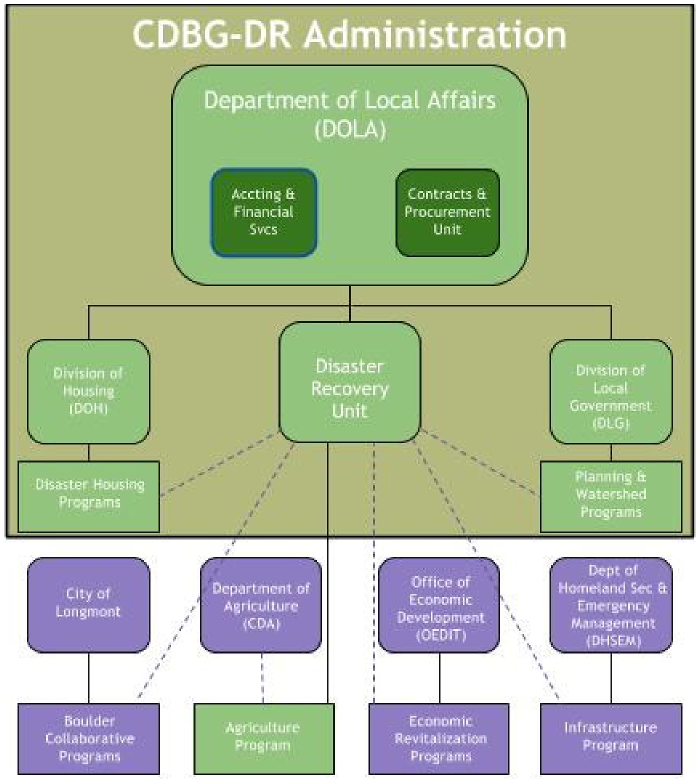
The Governor's Resiliency and Recovery Office (CRRO) provided oversight of implementation, policy and priorities for the portfolio of federal and state funding sources designated for Colorado's recovery from the disasters of 2012 and 2013. The CDBG-DR grant is administered by the Colorado Department of Local Affairs (DOLA), who is the fiscal agent and responsible to HUD for program oversight, reporting, and compliance. To accomplish this mission, the Disaster Recovery Unit was established within the Executive Office and is responsible for oversight and coordination of all CDBG-DR programs managed through multiple agencies both internal and external to DOLA. Additionally, all payments are processed through the Disaster Recovery Unit and DOLA's Accounting and Financial Services. The State's current administrative structure is as follows:

Table 31: Current Administrative Structure

Program	Managing Agency (Subgrantee)
Household Assistance	**Division of Housing (DOLA)**
Housing New Construction	**Division of Housing (DOLA)**
Infrastructure	**Division of Homeland Security and Emergency Management (Colorado Dept. of Public Safety)**
Watershed Implementation and Ditch	**Division of Local Governments (DOLA)**
Watershed Capacity	**Division of Local Governments (DOLA)**
Planning and Resilience	**Division of Local Governments (DOLA)**
Economic Revitalization (Business Grants and Tourism Marketing)	**Office of Economic Development and International Trade**
Agriculture Business Grants	**Disaster Recovery Unit (DOLA) in partnership with the Colorado Department of Agriculture**
Boulder County Collaborative (Household Assistance, Infrastructure)	**City of Longmont**

The State's administrative structure evolved to best account for the technical and grant management capacity needed to successfully implement programs.

Figure 14: CDBG-DR Administration



The diagram above indicates both agencies and programs. The programs highlighted in green are managed by DOLA divisions, while those in purple are managed by external partners. All external partners are State agencies with the exception of the City of Longmont.

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:

- Benefiting Low- and-Moderate-Income Persons;
- Preventing or Eliminating Slums or Blight; and
- 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 program rules state that in order to be eligible for funding, every CDBG-DR 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-DR rules. All activities must meet at least one of the three National Objectives.

Funds granted through CDBG-DR under PL 113-2 requires that 50% of funds granted through CDBG-DR benefit low-to-moderate income (LMI) households. A household qualifies as Low-and-Moderate Income (LMI) if they make less than 80% of the Area Median Income for their family size. Projects may also qualify if they are in a census area that is predominantly (51% or greater) LMI households.

The State will achieve this requirement by establishing minimum targets for each program and monitoring progress against those targets on a monthly basis. Minimum targets and total dollars to LMI beneficiaries are indicated below:

Table 32: LMI Minimum Targets

Program Area	Total Allocation	LMI Target	$$ to LMI
Household Assistance	$26,102,808	75%	$19,577,106.01
New Construction	$56,669,748	98%	$55,536,353.16
New Construction – Lyons	$4,000,000	100%	$4,000,000
Infrastructure	$69,448,427	20%	$13,889,685.31
Economic Recovery	$10,950,559	60%	$6,570,335.30
Agriculture	$8,920,000	60%	$5,352,000
Watershed and Ditch	$30,711,198	20%	$6,142,239.53
BCC Household Assistance	$10,802,413	65%	$7,021,568.56
BCC Infrastructure	$62,787,183	45%	$28,254,232.53
Total*	**$280,392,336**	**52%**	**$146,343,520**

* Does not include Planning and Administrative dollars.

For the purposes of this grant, the State defines urgent need as a disaster-related unmet need that results in substandard living, working or financial conditions for Colorado's households, businesses or local communities. Those programs identified as addressing urgent needs as a national objective specifically target the resolution of the hardships and circumstances that resulted from the unique impacts of the qualifying disasters. Urgent need may be applied when hardships from the disaster or significant vulnerability from future disaster events remains and can be documented at the program level.

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 funding to extend the benefit of disaster relief monies as far as possible. The State continues to closely monitor and 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
- 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. The State has taken a portfolio approach to the disaster recovery process and has sought opportunities to leverage a broad range of programs, including, but not limited to:

- Colorado'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.

Housing Programs

The flooding significantly impacted Colorado's housing sector with approximately $647 million in damage to homes and an additional $2.3 million in damage to private roads and/or bridges. The damage extended to 18 presidentially declared counties in Colorado, with the most impacted areas concentrated in Boulder, Larimer, and Weld counties. 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, 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 or at risk 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 32% of the State's allocation will be used for housing programs as outlined below. At least 80% 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% of the program allocation.

For the purpose of providing disaster recovery assistance, the State of Colorado defines demonstrable hardship as a household's adjusted family income (defined by 24 CFR 5.611 as Annual Income minus Deductions) being less than or equal to 30% of the Area Median Income for the family size. Where a household can prove such a demonstrable hardship and that more than 30% 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.

Many residents lost their homes due to the flooding and were 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.

Housing programs are divided into two major categories, household assistance and housing new construction. Household assistance programs enable existing households to return to stable housing conditions by providing temporary relocation, assistance to get into a new home, clearance of damaged properties or rehabilitation of their existing damaged home. This includes the replacement of bridges and road repairs on residential property to provide safe access that is up to code and resistant to future flooding. Housing New Construction provides replacement housing for disaster impacted households and provides affordable housing options in areas where destroyed housing units exacerbated an already tight housing market.

The programs outlined below are managed through the Division of Housing at the Colorado Department of Local Affairs. The City of Longmont has an allocation of $16,026,584 to manage these same programs on behalf of the Boulder County Collaborative as described in this Action Plan and the Partial Action Plan submitted by the Collaborative located at www.bccollaborative.org.

Table 33: Funding Distribution for Housing Activities

Programs	Round 1 Funding Allocation	Round 2 Funding Allocation	Round 3 Funding Allocation	Total Allocation
Household Assistance Programs	$7,614,395	$15,642,519	$2,845,895	$26,102,808
Temporary Rental Assistance & Relocation				
Housing Purchase (Down Payment Assistance)				
Housing Repairs (Homeowner and Renter Rehab)				
Clearance and Demolition				
Home Access Program				
Housing Construction Programs	$20,894,377	$34,341,658	$5,433,713	$60,669,748
Single Family –New Construction				
Multi –Family Rental Construction & Repair				
Town of Lyons Projects				
Boulder County Collaborative Housing	$0	$9,603,969	$1,198,444	$10,802,413
Housing Total	**$28,508,772**	**$59,588,145**	**$9,478,052**	**$97,574,969**

Household Assistance Programs

***Total Allocation for Program:* $36,905,221 ($10,802,413 allocated directly to Boulder County Collaborative)**

The allocation of funds is available for use in any of the five 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.

Based on the damages incurred, Colorado allocated CDBG-DR funds to Household Assistance Programs in all three rounds. These programs will continue to provide at least 75% of overall funding to low- to moderate-income families, with the percentage of funds targeted varying by program. The programs will also distribute at least 80% of funds to the three most impacted counties: Boulder, Larimer, and Weld.

Temporary Rental and Relocation Assistance (Single-Family and Multi-Family)

Temporary rental assistance and relocation will be available to low-income applicants while their single family or rental home is being constructed or repaired. The maximum temporary assistance allowed is based on fair market rental rates at the time of the program implementation and priority is given to residents previously residing in damaged or destroyed mobile homes, those at or below 30% 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 rental and relocation assistance program is administered in conformance with the Uniform Relocation Act as described in Federal Register 78 FR 14329, published on March 5, 2013. Efforts are 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.

The FEMA Manufactured Housing Unit (MHU) program closed out on March 14, 2015, 18 months after the flooding began. The Governor's Recovery Office, FEMA, Division of Housing and Division of Homeland Security and Emergency Management collaborated on the close of the program. All of the initial 56 families in FEMA housing were moved to more permanent housing options before the close out deadline. A priority for the Governor and the State to make sure those impacted were supported through this difficult time. This was a major milestone in the State's recovery from the floods that required a collaborative effort and dedicated work specifically from disaster case managers and local housing authorities.

The State and its local partners will continue to operate the Temporary Rental Assistance and Relocation Program on an as-needed basis and according to the criteria described in the approved Action Plan and Substantial Amendment 1, including administration of the program in conformance with the Uniform Relocation Act as described in Federal Register 78 FR 14329, published on March 5, 2013.

Maximum Award: $1,000,000 annually per sub-recipient; $25,000 per household

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

Eligibility Criteria: Homeowners and renters directly impacted by the floods or wildfires, 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% AMFI, with priority given to those at or below 30% AMFI.

National Objective: Low- and Moderate-Income Housing

Housing Purchase (Down Payment Assistance)

Eligibility criteria include households at less than 80% AMFI that were directly impacted by floods and are able to secure additional funding, if necessary, to complete the purchase of the new single family, manufactured or modular home. 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% 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.

Colorado recognizes the ongoing need for financial assistance and counseling for households who lost their residence due to flood or fire and want to purchase a primary residence. The State and its local partners will continue to operate the Down Payment Assistance program, including associated credit and home ownership counseling activities.

Maximum Award: $500,000 per sub-recipient; $50,000 per household (Sub-recipients may increase this maximum award to an amount up to $100,000 per household where housing market conditions warrant. In order to increase the maximum, sub-recipients must document the conditions that justify the increase and receive prior approval from the Division of Housing.)

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.

Eligibility Criteria: Households who were directly impacted by the floods or fires and are at or below 80% AMFI. Priority will be given to persons with disabilities, seniors, those who resided in manufactured housing units (MHU) that were damaged or destroyed, or low- moderate-income households.

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 condition 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% of the pre-flood, county-appraised value, on a per-house basis.

Colorado and its local partners recognize continued need for rehabilitation of primary residences and single-family rental properties, and related counseling activities. In addition, eligible applicants may also reimburse low and moderate income households for disaster-related assessments under the following conditions: a) the assessment must be due to mandatory repairs of damaged infrastructure such as road, water systems or utilities serving residential properties and b) the repairs must meet eligibility requirements in accordance with 24 CFR 570.482.

Maximum Award: $4,000,000 per sub-recipient annually; $100,000 per unit for rehabilitation, reconstruction/replacement, or 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.

Eligibility Criteria: Primary residences and single-family rental properties with one to four units that suffered direct flood or fire damage. Priority will be given to housing that will serve those with disabilities, seniors, those who resided in manufactured housing units (MHU) that were damaged or destroyed, or low- moderate-income households.

National Objective: Low- and Moderate-Income Housing and Urgent Need

Clearance and Demolition
The floods left some areas with concentrated damage to groups of housing structures that had 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.

Colorado and its local partners will operate the Clearance and Demolition program to remove unsound structures posing health and safety risks to the surrounding community. In addition, in cases where acquisition is appropriate in conjunction with clearance and demolition, eligible applicants will have the option to offer incentives in conjunction with acquisitions where necessary to prevent future construction in hazardous areas.
Maximum Award: $500,000 annually per sub-recipient.

Eligible Applicants: Units of general local government or their designated non-profits or housing authorities.

Eligibility Criteria: The acquired and/or cleared or demolished 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: Low- and Moderate-Income, Removal of Slums and Blight, and Urgent Need

Home Access Program

The Home Access program has evolved over time to best meet administration and beneficiary needs. The program supports homeowners and renters who are unable to access their homes due to damage to roads that are non-county maintained and need assistance. FEMA public assistance may not be available to repair these roads, bridges, and other private crossings due to their lack of public maintenance, even though they provide critical emergency access to families whether they are homeowners or renters, especially when considering the danger posed by forest fires. Without the reconstruction of these private roads, bridges, and crossings, residents will be at high risk when the next disaster occurs. At present, affected residents do not have access to homes or evacuation routes.

Maximum Award: The maximum award per sub-recipient is limited to $3,000,000 annually. Sub-awards under the sub-recipient contract are limited to $500,000.

Eligibility Criteria: 51% of the recipients must be low-and-moderate income households unless Urgent Need can be substantiated.

Eligible Applicants: Sub-recipients may include special districts and units of general local government.

Beneficiary Eligibility Criteria: Applicants must demonstrate that private road, bridge, or other private access was directly damaged by the floods or fires and provides sole access to the target homes. Applicants must further 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

Housing New Construction Programs

Total Allocation for Program: **$60,669,748 ($4,000,000 dedicated to projects in the Town of Lyons)**

The allocation of funds is available for use in either of the two new construction programs as described below. Controls are 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. All assistance will continue to be provided in adherence with the URA as described in Federal Register 78 FR 14329.

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 households 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. Household 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 continue to 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 (IEEC)
- 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 annually per sub-recipient; $100,000 for individual household awards.

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

Targeted Beneficiaries: Households impacted by the floods or wildfires with priority given to households 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% AMFI for at least 75% of beneficiaries served.

National Objective: Low- and Moderate-Income Housing and Urgent Need

Multi-Family Rental Housing Construction and Repair
The multi-family housing construction program will include new construction and land acquisition, for townhomes, duplexes, and properties with more than eight 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 30-year land use covenant will be utilized in these multi-family development projects. The State offers preference for new construction multi-family projects serving the homeless, domestic violence, and other special needs.

Projects funded shall continue to 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
- Furthermore, the targeted percent
- Percentage of service to low- and moderate-income families for this program will continue to be 80% of the service population

Maximum Award: $4,000,000 annually per sub-recipient

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: Program funds may be used in proportion to the number of affordable units in the development. Sub-recipients will have policies and procedures to ensure leasing at proper rent levels and to income-eligible applicants. A 30-year land use covenant will be utilized in these multi-family development projects. Project priority will be given to households with special needs, seniors, homeless population, and those suffering from domestic violence at or below 80% AMFI. Leasing priority will be given to households directly impacted by the floods or wildfires, including those who resided in damaged or destroyed modular homes or MHUs.

National Objective: Low- and Moderate-Income Housing and Urgent Need

Infrastructure Programs

Recovery Colorado Infrastructure Grant Program

***Total Allocation for Programs:* $132,235,610 ($62,787,183 allocated directly to Boulder County Collaborative)**

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 immediately 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 has and continues to be imperative to long-term recovery. The Recover Colorado Infrastructure Grant Program will be administered by the Division of Homeland Security and Emergency Management (DHSEM). The Boulder County Collaborative sub-allocation of $56 million will be administered by the City of Longmont.

The Recover Colorado Infrastructure Grant Program includes projects that restore critical services and infrastructure, including roads and bridges, water and wastewater treatment facilities and piped water distribution systems, parks, public facilities, acquisition-demolition-open space, etc.; stream bank restoration and stabilization projects may also be funded. Further, the Infrastructure Program may also be used to fund the local cost share of eligible projects under FEMA Public Assistance Projects, FEMA Hazard Mitigation Grant Program Projects, Natural Resources Conservation Service Emergency Watershed Protection Programs, or other Federally Assisted Infrastructure projects. The State and local governments may adopt a global match strategy utilizing a combination of CDBG-DR and State Disaster Emergency Funds.

Significant demand has been demonstrated for Infrastructure Program funds. The State has identified additional unmet needs in multiple infrastructure areas, including but not limited to communications, water, wastewater management, public transportation and damaged public facilities.

Amendment 2 allocated $22,628,110 to the resolution of regional and local infrastructure projects through the Recovery Colorado Infrastructure Grant Program. Amendment 6 re-allocated funds from other programs and redistributed infrastructure funds between rounds (see funding allocation table below). All implemented program selection criteria will adhere to a risk-based approach in accordance with 79 FR 31964.

Table 34: Funding Distribution for Infrastructure Activities

Programs	Round 1 Funding Allocation	Round 2 Funding Allocation	Round 3 Funding Allocation	Total Allocation
Infrastructure Program	$21,067,600	$33,305,500	$15,075,327	$69,448,427
BCC Infrastructure	$1,073,274	$39,802,124	$21,911,785	$62,787,183
Infrastructure Total	**$22,140,874**	**$73,107,624**	**$36,987,112**	**$132,235,610**

The State commits to distribute Infrastructure Program funding within impacted counties based on the wildfire-related and flood-related damage per county and based on percentage of impact using FEMA Individual and Public Assistance allocations. The Round 3 Infrastructure Program targets per county are shown in the table below. Note that the percentages below are preliminary targets intended to ensure that disaster resources awarded are consistent with the documented need. The final percentages will vary slightly as project budgets are finalized and needs are re-assessed. Final project investments must remain within 20% of these initial targets as indicated in the ranges in table 35.

Table 35: Allocation of Infrastructure Funding per County

County	Estimated Infrastructure Impact Percentage	Required Range of Recovery Investment
Boulder County	48%	38% - 58%
Larimer County	22%	17% - 27%
Weld County	8%	6% - 10%
Other Counties	22%	17% - 27%
Total	**100%**	

Disaster Risk Reduction Areas

The State expanded the Existing Acquisition and Buyout program, to include buyouts of homes located in Disaster Risk Reduction Areas in accordance with the November 18, 2015 Federal Register which states that a ‘‘buyout’’ in all prior notices is amended to mean:

“ Acquisition of properties located in a floodway or floodplain that is intended to reduce risk from future flooding, or the acquisition of properties in ‘Disaster Risk Reduction Areas’ located outside of floodways and floodplains for the purpose of reducing risks from the hazard that was the basis of the Disaster Risk Reduction Area designation.”

Generally, for properties to qualify, they must be determined at risk by a geologic hazard such as mudslide, landslide or erosion. This determination will be made by State or local authorities in accordance with standards developed by the Colorado Resilience and Recovery Office defining eligible Disaster Risk Reduction Areas. This revised eligibility criteria will be applied retroactively for any applications for voluntary buyouts received after the date of the initial disaster (September 11, 2013).

Maximum Award: The CDBG-DR award amount per project maximum is $10,000,000.

Eligible Applicants: Units of local government, special districts, and non-profits who provide services to the greater public. Applicants located in counties declared for DR-4134, DR-4133, DR-4145 and DR-4067 are eligible. Projects judged to be directly beneficial to the mitigation of future disaster impact or judged to significantly benefit the resilience efforts of disaster-impacted communities may be eligible for funding whether or not the infrastructure entity in question was directly impacted by flood or fire.

Eligible Activities: Projects that restore critical services and infrastructure, including roads and bridges, water and wastewater treatment facilities and piped water distribution systems, parks, public facilities, acquisition-demolition-open space, etc., stream bank restoration and stabilization projects may also be funded. In addition to flood-related damage, fire-impacted projects are also eligible including post-wildfire flood mitigation activities and fuels reduction or defensible space. Communities may offer incentives in conjunction with property acquisitions where necessary to prevent future construction in hazardous areas.

All activities implemented to provide resilience for watershed and streambeds will be implemented within the Watershed Resilience Program. However, based on demand and available funding, stream bank restoration and stabilization projects may also be funded through the Infrastructure Program.

Selection Criteria: Infrastructure funds will be distributed through an application process that evaluates objective weighted scoring criteria. Information on the application process will be widely disseminated and will include, but not limited to, local governments that are sub-grantees in the FEMA Public Assistance and HMGP programs, sub-grantees under the National Resources Conservation Services Emergency Watershed Protection Program (NRCS EWPP), and participants in the FHWA Emergency Relief Program under DRs 4067, 4133, 4134, and 4145.

The following risk and resiliency criteria may apply:

- Risk from natural hazards and climate change (floods, fires, geologic hazards, etc.)
- Proximity to the 100-year floodplain (using National Flood Insurance Program maps <u>or</u> best available data)
- Project useful life (How long is the project designed to last? What maintenance will be required?)
- Project Impact on the Community’s FEMA Community Rating System score (if applicable)
- Public health and safety impacts (i.e. critical access routes, protection of critical facilities)
- Direct and indirect economic impacts (i.e. preventing loss of function of critical infrastructure, business interruption)
- Social impacts (benefits to access and functional needs or socially vulnerable populations, continuity of services)

- Environmental impacts and benefits (i.e. restoration of habitat, water quality, other natural and beneficial functions of floodplains)

Applications are reviewed by community development, infrastructure systems, emergency management, floodplain management, public health/environment; other relevant disciplines may also serve on the review team.

The State has one project that meets the Federal Register criteria for a Major Infrastructure Project ("covered project"). This is the Resilient St. Vrain Project as outlined in Appendix C of the Action Plan. For this project the $10 million cap on infrastructure projects is waived. For the purposes of the Action Plan, a Major Infrastructure Project is defined as a project with $10 million in CDBG-DR funds and an overall budget of $50 million, a project that may stretch across more than one county, or two or more related infrastructure projects that have a combined total cost of $50 million or more (including at least $10 million of CDBG-DR funds). The State will incorporate the requirements for Major Infrastructure Projects for HUD review and approval as set forth in 79 FR 31964 through the action plan amendment process, as updated and amended by 79 FR 62182 and 80 FR 17772. The State recognizes that some projects will span more than one jurisdiction and require cross-jurisdictional cooperation. In cases where a project spans more than one jurisdiction, the State will either serve as the coordinating agency or require an inter-governmental agreement be put in place between the entities to clearly communicate roles and responsibilities.

National Objective: Service to Low and Moderate Income Populations, Urgent Need, and Removal of Slums and Blight.

Watershed Resilience and Ditch Programs

Total Allocation for Program: **$30,711,198**

The Watershed Resilience implementation program and the Privately Owned and Non-Profit Ditch company programs have been merged into a single program to facilitate a more efficient process. This merger allows a single application to be used for both programs. While private and non-profit ditch companies are still the primary applicants for the ditch program, they are able to partner with watershed coalitions to serve as fiscal agents in the management of these federal dollars. This will better align projects and facilitate the successful implementation where additional management capacity is beneficial. While the two programs are being merged into a single program, the funding amount does not change; the original $4 million in targeted funding for the ditch-related projects remains.

Watershed Resilience Project Implementation

The Watershed Project Implementation component provides for the implementation of watershed master plans. While the awards can serve as a standalone source of funding for entire projects, the State expects awarded coalitions to leverage dollars through other public and private funding streams to be identified by the applicants. Competitive projects for this component will be multi-objective in approach, focused on building resilient communities and watersheds, and will often include several partners and communities along the waterway. Examples of anticipated construction activities include, but are not limited to:

- Restoring streams to build resilience
- Creating recreation corridors and greenways for public use
- Mitigation and stability projects that maximize community benefit
- Developing public use parks and trails for greater community connectivity
- Supporting conservation easements and property acquisitions

Maximum Award: $2,000,000

Eligible Applicants: Watershed coalitions in federally-declared disaster areas, coalition partners and units of local government.

Eligibility Requirements: Projects must be consistent with the planning activities proposed in the existing watershed master plans and other regional plans.

Ditch Program Implementation

The State is setting aside approximately $4 million from the Watershed Implementation program specifically for assisting private and non-profit ditch companies for urgent repair and implementation of resilience measures. This program will be run in concert with the Watershed Implementation program and will utilize the same application. Viable ditch infrastructure is vital to the economic recovery effort of agricultural businesses because of the dependence on ditch-delivered water in the semi-arid farming environment of Colorado; the economic impacts from damaged ditches are passed down to the low- and moderate-income farming demographic. These farmers are required to pay a monthly fee to the ditch companies in exchange for regular maintenance and repair of ditch infrastructure that services their property. This grant program also requires that funded ditch companies coordinate to the greatest extent reasonably possible with the regional and State watershed initiatives outlined in this amendment in order to take advantage of the larger resilience and restoration effort.

Maximum Award: $2,000,000. An additional award of up to $100,000 is available if resilience features or fish and wildlife habitat improvement are incorporated into the design and implementation of the proposed activity.

Eligible Applicants: Privately owned and non-profit ditch companies with unmet need and watershed coalitions conducting projects in coordination with privately owned and non-profit ditch companies.

Eligibility Requirements: Minimum of 50% of the water rights must be used for agricultural purposes. The target beneficiaries are agriculture businesses subjected to paying assessment fee for ditch repair, maintenance, and resilience.

National Objectives: Benefit to LMI persons and Urgent Need

Economic Recovery Programs

***Total Allocation for Program:* $10,950,559**

The Office of Economic Development and International Trade administers Economic Recovery Programs. The Colorado Small Business Development Center Network assists with the initial consultations and in determining application eligibility; all applicants for grant and loan programs must be vetted through the SBDC. These programs are targeted to provide assistance to small businesses, including operating expenses, as further defined, to aid them with their remaining economic unmet need.

In response to unmet needs, Colorado has allocated CDBG-DR funds to Economic Recovery programs consistent with federal guidance. The State supports the programs based on continued unmet needs, community response and funding applications received to date.

The programs will also distribute at least 80% of funds to the 3 most impacted counties: Boulder, Larimer, and Weld.

Consolidation of Economic Recovery Programs

The State is investing in Colorado's economic recovery through three programs totaling $9.88 million through the Office of Economic Development and International Trade (OEDIT). The Technical Assistance for Small Businesses program is now combined with the Business Grant and Loan Program. Those funds will be used to produce a Disaster Recovery Guide for Businesses to be distributed to grant and loan recipients. The table below describes the initial allocation across these three programs. OEDIT may shift funds across these three program areas based on demand. However, the total amount available for Tourism Marketing is limited to the $1,268,300 as per HUD's approval of Colorado's waiver. Note that with this amendment, the State is making a technical correction to bring the Tourism amount up to $1,268,300 (previously $1,228,300 in past Action Plans) as designated by the original HUD waiver approved November 18, 2015.

Closure of the Workforce Development Program

Based on low levels of demand and the current low unemployment rate in Colorado, including the impacted areas, OEDIT has determined that it would not be cost effective to run a Workforce Development program, and substantiating disaster impact at this point in the disaster would be difficult to justify and document. This amendment re-allocates the funds for this program to previously unfunded infrastructure projects and other priorities.

Table 36: Funding Distribution for Economic Recovery Program

Programs	Round 1 Funding Allocation	Round 2 Funding Allocation	Round 3 Funding Allocation	Total Allocation
Economic Revitalization Total	**$5,265,160**	**$4,523,611**	**$1,161,788**	**$10,950,559**
Recovery Colorado Business Grants/Loans				
Tourism Marketing				

Recover Colorado Business Grant and Loan Program

Based on the funding increase provided in Amendment 1, applications received to date and projected ability to meet demand, the State did not provide an increase in funding with Amendment 2.
The State amended the program to increase the maximum grant and total award for businesses that have been affected by both flood and fire disasters per Table 37 below. This modification is intended to address needs demonstrated by businesses whose operations were impacted by two disasters in a relatively short time period.

Table 37: Maximum Award - Colorado Business Grant and Loan Program

Recover Colorado Business Grants/Loans					
Business Locations	Flood Damaged	Fire Damaged	Maximum Grant	Maximum Loan	Maximum Award
1 (Single Location)	X		$50,000	$100,000	$150,000
		X	$50,000	$100,000	$150,000
	X	X	$100,000	$100,000	$200,000
2 or more (Multiple Locations)	X		$75,000	$100,000	$175,000
		X	$75,000	$100,000	$175,000
	X	X	$150,000	$100,000	$250,000

An additional grant award up to $50,000 shall be allowed to businesses that reside in an area with limited access that have had or are still experiencing ongoing disaster-related limited access issues (e.g. due to road closures) that are impacting these businesses beyond December 2014.

Eligibility requirements will allow applications from businesses with over $1 million in liquid assets based on interest and need expressed by larger businesses. The Colorado Office of Economic Development and International Trade (OEDIT) will determine eligibility of such businesses and may implement additional requirements as defined in program guidelines for larger businesses, such as enhanced job creation. In addition, such businesses must meet the U.S. Small Business Administration size standards for small businesses.

Threshold for eligibility requirements, as related to unmet need, is $5,000. This is intended to respond to the needs of smaller businesses and those located in rural communities that experienced operational, rather than property loss.

Maximum Award: $150,000 for businesses operating in a single location ($50,000 grant, $100,000 loan), or $175,000 for businesses operating in multiple locations ($75,000 grant, $100,000 loan). Businesses impacted by both flood and fire disasters may be eligible for either a maximum award of $200,000 ($100,000 grant, $100,000 loan (single location)) or $250,000 ($150,000 grant, $100,000 loan (multiple locations))

Eligible Applicants: Small Businesses, non-profits, and micro-enterprises. New businesses may be determined eligible to apply based on OEDIT eligibility requirements described below.

Eligibility Requirements:

- Businesses must have been in existence on the FEMA incident date (date of disaster) for the grant and loan program or meet new business requirements for new business program eligibility.
- Businesses must be in existence 6 months prior to ongoing road closure caused by a presidentially-declared disaster event.
- Business has to be located within a disaster-declared county per FEMA 4145-DR, FEMA 4134-DR, FEMA 4133-DR, or FEMA 4067-DR.
- Business must be in good standing to do business in Colorado and have a Certification of Good Standing from the Colorado Secretary of State.
- Business must have a minimum of $15,000 in annual revenue.
- Business must have less than $1 million in liquid assets; certain businesses with greater than $1 million in liquid assets may be determined eligible (additional requirements may apply).
- Business must positively impact the economy through capital investment or the creation or retention of jobs.
- Business must show indications of profitability before the disaster occurred.
- Business must have an unmet need of $5,000 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 that at least 80% of dollars are deployed to the three most impacted counties and LMI requirements are met.

National Objective: Low- and Moderate-Income Jobs and Urgent Need

Tourism Marketing

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% 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 Tourism Marketing Grant Program will assist non-profit, quasi-governmental entities and local governments to promote tourism in the designated disaster areas. 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 a total of $1,268,300 of the CDBG-DR funds for marketing to re-establish tourism in the affected areas; $500,000 was allocated and fully utilized from the initial Action Plan. A waiver was requested and received for an additional $768,300 from the second allocation award. 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 Program: **$1,268,300**

Maximum Award: $150,000

Eligible Applicants: Non-profit, quasi-governmental and local government 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 Program, but may not be recipients of both.

National Objective: Benefit to Low and Moderate Income and Urgent Need

Agriculture Business Grant Program

The State affirms its commitment to the restoration of its agriculturally-based communities by offering an Agricultural Business Grant Program. The Department of Local Affairs works in partnership with the Colorado Department of Agriculture on this program.

This program serves agricultural businesses with remaining unmet needs impacted by the 2013 floods and wildfires of 2012 and 2013. Eligible businesses are farmers, ranchers, and producers that are registered and in good standing with the Secretary of State. The State has allocated $9 million to assist those farmers and ranchers affected to help recover and revitalize Colorado's agriculture industry. Per HUD requirements, at least 80% will be distributed to those within the three most affected counties, Boulder, Larimer, and Weld. The program ensures 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 program can be obligated to counties outside of the three most impacted counties of Boulder, Larimer and Weld. None of the three most impacted counties will receive less than 10% of the allocation. Overall, 50% of the resources are targeted toward low- and moderate-income beneficiaries.

The State will continue to monitor the need for assistance and will revisit the allocation of funding accordingly. The program allocations are shown in the table below.

Table 38: Distribution for Agriculture Activities

Programs	Round 1 Funding Allocation	Round 2 Funding Allocation	Round3 Funding Allocation	Total Allocation
Agricultural Business Grants	**$4,500,000**	**$4,420,000**	**$0**	**$8,920,000**

Total Allocation: **$8,920,000**
If allocated grant funds are fully expended and additional CDBG-DR funds are available, the State will consider additional dollars for this program in a future Substantial Amendment.

Minimum Award: $15,000

Maximum Award: $150,000

Eligible Applicants: Farmers or ranchers who are a microenterprise or small business and generate agricultural income.

Eligibility Requirements:
Businesses must be registered and certified to be in good standing with the Colorado Secretary of State; sole proprietors and trusts are exempt from this requirement.

Businesses must have existed prior to the federally-declared disaster of concern and have been affected by that disaster. Business must be an agricultural producer or support the agricultural sector.
The agricultural business property or operations must be physically located within a disaster-declared county per FEMA 4145-DR, 4134-DR, 4133-DR or 4067-DR.

Businesses must demonstrate at least $1,000 of gross annual agricultural revenue was earned in 2011, 2012 or 2013; new farmers or ranchers may request an exemption from this requirement. Alternatively, agricultural businesses that can demonstrate $10,000 or more was invested in agricultural business infrastructure between 2011 and 2013 may request an exemption from this requirement.

Businesses must have pursued other forms of disaster-related financial assistance and still have a remaining unmet need. Business must meet the definition of small business as defined by SBA at 13 CFR Part 121 or meets the USDA Farm Service Agency (FSA) criteria that are described at 7 CFR 1400.500.

National Objective: Benefit to Low and Moderate Income and Urgent Need

Planning and Resilience Programs

***Total Allocation for Program:* $24,210,375**

The State of Colorado affirms its support to 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 and through initiatives that focus on improving Colorado's resistance to disaster and decrease the recovery time required when disaster strikes.

Based on projected Planning and Resilience Program needs, including potential for Resilience Planning funding for Watershed Planning applications, the State allocated funding as shown in the table below.

Table 39: Funding Distribution for Planning & Resilience Initiatives

Programs	Round 1 Funding Allocation	Round 2 Funding Allocation	Round 3 Funding Allocation	Total Allocation
Planning and Resilience (including Community Resilience Partnership Fund)	$1,000,000	$14,627,000	$854,074	$16,481,074
Statewide Environmental Review	$900,000	$1,165,000	$250,000	$2,315,000
Watershed Planning and Capacity Building		$4,912,948	$394,202	$5,307,150
BCC Planning			$107,151	$107,151
Planning and Resilience Initiatives Total	**$1,900,000**	**$20,704,948**	**$1,605,427**	**$24,210,375**

Planning and Resilience

***Total Allocation:* $16,481,074**

Community Planning

The planning program will provide communities with the opportunity to comprehensively assess impacts and needs across their entire recovery process, from economic development and housing to infrastructure hazard mitigation and resiliency needs. The ultimate purpose of planning is to identify specific, targeted activities to be implemented as a part of the recovery and reconstruction process so that communities are not only able to build back what was lost or damaged, but to build back stronger, safer and more resilient for future disasters. Therefore, specific activities that may be funded include, but are not limited to:

- Long-range, comprehensive community plans that integrate hazard and resilience planning
- Strategic housing studies, site development plans and fair housing studies
- Economic development strategic plans
- Hazard identification and risk assessments
- Feasibility studies
- Storm water master plans
- Capital improvement plans tied directly to disaster impacts
- Addressing flood mitigation through multi-objective parks and open space planning

- Updates to land use and building codes to mitigate risk from future disasters
- Regional resilience plans to support better prepared communities
- Area neighborhood plans
- Community outreach and education activities specific to disaster impact
- Climate adaptation plans
- Identify and implement strategies to improve status in the FEMA community rating system
- Data analysis and mapping

The second allocation of CDBG-DR funding from HUD allowed fire-impacted communities to participate in CDBG-DR planning activities. The State will give priority to proposed planning initiatives that consider sustainability and resilience principles such as green rebuilding, as well as to those that are designed to serve in particular the low-to-moderate income constituents in need of long-term disaster recovery and rebuilding assistance. The State will also give priority to funding proposals submitted by regional coalitions of stakeholders that have demonstrated the ability to gain support and resources from multiple partners across jurisdictions and disciplines. Funding will also be prioritized for partnerships or single jurisdiction projects that have broad benefits and address urgent recovery needs. Depending on local demand in both the Resilience Planning and Watershed Planning Programs, the State anticipates diverting some or all of the Watershed Planning applications to be considered for funding in the Resilience Planning Program.

Maximum Award: $300,000

Eligible Applicants: Units of general local government and non-profits

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

National Objective: Planning meets a national objective in accordance with 24 CFR 570.208(d) (4)

Statewide Planning Initiatives

In the face of the 2012-2013 wildfires and the 2013 floods, Colorado recognizes the need to take coordinated action to reduce vulnerability and to build resilience for the long term. The State completed the Colorado Resiliency Framework, which extends the resiliency planning process beyond the damages of past disasters and into the reduction of future vulnerabilities to shocks and stresses throughout the entire state. Currently, the Framework serves as a platform and roadmap for coordinated resilience action across the state. In addition, the Framework specifically serves as a guide for the integration of resiliency principles into CDBG-DR programs and a model for the development of resilience tools and resources, as well as local resiliency frameworks and strategies.

The purpose of Statewide Planning Initiatives is to promote a science-based, risk-analysis approach to evaluate, develop and implement long-term resilience efforts. This program supports the development of technical tools and plans to empower local and regional mitigation and resilience efforts, such as model regulation or standards that incorporate natural hazards, public access websites, resiliency frameworks or other approaches that provide education and tools to support resilience efforts.

Amendment 1 to the Action Plan increased the allocation for this program by $865,000 to a total of $1,765,000. In addition, based on anticipated needs and the desired funding strategy, the maximum award under the program increased from $800,000 to $900,000.

Maximum Award: $900,000

Eligible Applicants: State Agencies

Eligibility Criteria: Projects will benefit communities, region-wide or statewide, and include a risk-analysis approach that addresses natural hazards and climate change. Specific activities may include but are not limited to:

- Web-based recovery and community development tools
- Local and regional education programs
- Development of risk-analysis methods and tools
- Evaluation and implementation of resilience standards focused on mitigating natural disasters, man-made hazards and climate change impacts
- Effective plan development for the use of grant funds including Community Development Block Grant - Disaster Recovery and other federal or non-federal funding sources related to the eligible disasters
- Development/implementation of Colorado Resiliency Framework

National Objective: Planning meets a national objective in accordance with 24 CFR 570.208(d) (4)

Community Resiliency

As part of the third allocation of CDBG-DR funds, Colorado created the Colorado Community Resiliency Partnership Fund (CCRPF). The intent of creating the CCRPF was to meet the need, identified through unmet needs assessments, engagement with local communities, and the development of the Colorado Resiliency Framework to establish sustainable funding mechanisms and practices to advance resiliency in the recovery process and beyond. Since the approval of the third allocation, the State has conducted extensive engagement with communities and the private sector, analyzed national best practices, and evaluated the amount of startup capital necessary to establish a revolving loan fund model.

As a result of that process, the State remains committed to advancing sustainable funding models for long-term resilience at the local and state level as a key strategy to reduce future disaster losses.

However, it has also been determined that a revolving loan fund utilizing limited CDBG-DR funding will not be the most effective model to meet the intent of the fund. Rather, the State intends to use this fund to work with State agencies and units of local government to implement resiliency projects and practices.

Maximum Award: $250,000

Eligible Applicants: State agencies and units of local governments with a role in funding and implementing community resiliency projects and practices.

Eligibility Criteria: State agencies or local governments who seek to establish sustainable funding or budgeting practices to advance long-term resiliency.
Objectives for this funding include:

- Cultivating lasting frameworks for funding in support of community adaptability to sudden shocks and chronic stresses.
- Empowering localities to develop and adopt resiliency practices and policies.
- Integrating risk management into standard community practices.
- Building partnerships across the public, private, and non-profit sectors to enhance community resilience.
- Leveraging limited public funds and resources for larger impact.
- Addressing the needs of vulnerable populations.

Grants will be provided to eligible applicants who seek to develop sustainable resiliency budgeting and funding practices. These eligible activities include feasibility studies or plans that may:

- Inventory existing resiliency criteria in budgeting or funding practices and programs
- Develop recommendations to integrate risk screening and resiliency practices into budgeting, funding and development practices (i.e. annual budgets, grant criteria, capital improvement programs, permitting and zoning)
- Support implementation resiliency recommendations
- Pro forma or feasibility studies for establishing new funding approaches including enterprise funds, grant funds, revolving loan funds, or other locally appropriate mechanisms

Applicants are encouraged to utilize local or regional resiliency frameworks or strategies and the resiliency prioritization criteria identified within the Colorado Resiliency Framework to inform project design, implementation, and monitoring practices.

Priority will be given to applicants who demonstrate: (1) commitment to implementing recommendations developed through funded plans or studies, (2) benefit to disadvantaged and most vulnerable populations in the region, (3) prioritization of efforts to address areas of high risk and vulnerability, (4) desire to cultivate and maintain lasting partnerships, and (5) innovation in approach, design or strategy to advance best practices.

Statewide Environmental Review Program

***Total Allocation:* $2,315,000**

Colorado has committed to providing local governments and sub-recipients professional services to expedite the environmental review process. By utilizing a single contractor, the State can expedite environmental reviews by consolidating area reviews and removing the burden of securing environmental review services on already strapped local staff. This service will be available to local governments and non-profits implementing infrastructure, watershed and housing projects throughout the impacted areas and reduce the cost and time associated with reviews for sub-recipients executing projects subject to environmental review requirements. This consolidated approach offers the added advantage of having a single State point of contact with multiple federal, state and tribal entities in the clearance of recovery-related projects.

Watershed Capacity Building

***Total Allocation*: $$5,307,150**

Watershed Capacity and Building Program

The Watershed Capacity Building and Planning component provides for staffing and consulting services at the State level and for staffing of watershed coalitions in federally-declared disaster areas. If the need is substantiated according to program guidelines, staff may be funded for multiple years. Capacity building includes watershed education, technical assistance, outreach, and coordination activities. This component incentivizes unified watershed resilience initiatives through the establishment of a network of experienced staff.

Maximum Award: $550,000

Eligible Applicants: State of Colorado, watershed coalitions in federally-declared disaster areas, units of local government.

Eligibility Requirements: Successful applicants will demonstrate how staffing increases capacity and improves the ability to carry out state or regional work that is supported by watershed stakeholders. Planning elements must address areas such as stream restoration or enhancement, land use, economic development, hazard mitigation, infrastructure (e.g., utilities and roads), recreation, green infrastructure, and community connectivity to the river. Plans must be consistent with or further watershed master plans funded by the Colorado Water Conservation Board, or otherwise demonstrate broad support from key partners.

Boulder County Collaborative Sub-Allocation

Per Colorado's Action Plan and subsequent Substantial Amendment 1 (approved by HUD on November 5, 2014), the State will allocate 80% of awarded CDBG-Disaster Recovery funding to the three most impacted counties of Boulder, Larimer and Weld. In addition, the State provided the option for the three most impacted counties to participate in a sub-allocation in Substantial Amendment 1. To implement this option, the State derived funding amounts for Household Assistance and Infrastructure activities based on impact. The Boulder County Collaborative (the Collaborative) has elected to participate in the sub-allocation option and developed a partial action plan for the use of these funds.

The Collaborative convened stakeholder communities, conducted an unmet needs assessment, developed a partial action plan and met all of the requirements to receive a separate sub-allocation in accordance with the Action Plan Amendment 2. As such, the State awarded a sub-allocation of Rounds 2 and 3 funding for Housing and Infrastructure to the Collaborative managed by the City of Longmont as a subgrantee. In accordance with the State's impact assessments across counties, the Collaborative was awarded 48% of infrastructure allocations and 52% of housing-related funds (less $1 million dollars transferred to Larimer County for Round 1 Home Access), formalized through Substantial Action Plan Amendment 3 approved by HUD on December 2, 2015.

Boulder County Collaborative Partial Action Plan

On June 1, 2015 the State of Colorado received the Boulder County Collaborative Partial Action Plan, which summarizes the unmet needs for flood recovery in Boulder County and its communities[4] and describes the Collaborative's proposed projects and programs for housing and infrastructure programs. The State reviewed the Partial Action Plan and provided comments. Those comments were incorporated, and the State accepted and acknowledged the assessments and activities included in the Partial Action Plan. The Boulder County Collaborative CDBG-DR Partial Action plan is available online at http://www.bccollaborative.org/cdbg-dr-action-planamendments.html.

Unmet Needs

The State acknowledges the Boulder County Unmet Needs Assessment found in Appendix A of the Partial Action Plan. The Collaborative coordinated with the City of Longmont to conduct a county-wide unmet needs assessment that included FEMA data collected immediately after the storm and additional area data not otherwise collected for emergency relief programs. The report calculates unmet need by using FEMA data from Individual Assistance for Housing and Public Assistance for Infrastructure, surveys from special districts and the Water Conservancy District, and a local assessment to calculate unmet need for creek repair and resiliency[4]. The overall unmet needs analysis determined approximately

[4] The Boulder County Collaborative Participating Governmental Entities include: Boulder County, City of Boulder, Town of Jamestown, City of Lafayette (opted out 2/2017), City of Longmont, City of Louisville, Town of Lyons, and Town of Nederland (opted out for Round 3 - 2/2017).

$928,769,667 of identified unmet need for recovery and resilience across Boulder County. Unmet housing need in Boulder County and its communities has been calculated at $194,552,388. Unmet infrastructure need has been calculated at $699,666,743.

Table 40: Summary of Countywide Estimated Flood Recovery Unmet Need and Percentages

Activity	Unmet Needs County-wide	Percent
Housing Unmet Need	$194,552,388	20.95%
Infrastructure Unmet Need (including special district and watershed)	$699,666,743	75.33%
Business Unmet Need (includes lost revenue)	$16,858,842	1.82%
Planning and Capacity	$8,501,689	.92%
Additional Community Need	$9,190,005	.99%
Total	**$928,769,667**	**100%**

Boulder County Collaborative Citizen Participation

The State reviewed and approved the Citizen Participation Plan submitted by the Collaborative. The Collaborative received community input through a 47-day open comment period from March 4, 2015 through April 20, 2015 when the Partial Action Plan was posted to the City of Longmont public website. The Collaborative also held a series of public hearings from March 12, 2015 to April 1, 2015 in the following areas: Boulder County, City of Longmont, Town of Jamestown, and Town of Lyons. Stakeholders and citizens were notified of public hearings one week before they were held. Future Substantial Amendments to the Partial Action Plan will be presented by the same method, allowing for public comment on all substantial changes to the recovery effort. Any future amendments to the Partial Action Plan are subject to approval by the State.

Boulder County Collaborative Program Priorities

The Collaborative will review all projects submitted by Participating Entities and will prioritize projects for funding according to the criteria set forth in Section 4 regarding eligible activities and project selection criteria in Appendix D of the Partial Action Plan[5].

The Collaborative initially allocated $34,050,437 for activities falling under Infrastructure programs, and $9,603,969 to activities falling under Housing programs using Round 2 funds. In the tables below, each of these activities has an estimated amount of funding to be expended. However, as funds are expended, budget adjustments may become necessary based on determined need.

[5] 79 FR 31973, June 3, 2014, HUD permits the use of FEMA data to calculate unmet need

Table 41: Projected Round 2 Funding - Infrastructure Program

Infrastructure Programs	Estimated Funding Amount
Minimum Threshold Projects	$2,250,000
Priority Infrastructure Projects	$13,300,437
Buyout/Acquisition	$18,500,000
Total	**$34,050,437**

The above funding distributions are preliminary estimates only. The Boulder County Collaborative has the ability to shift funds within these infrastructure program categories.

Table 42: Estimated Distribution of Round 2 Funds by Housing Program

Household Assistance Program	Estimated Funding Amount
Temporary Rental Assistance	$250,000
Down Payment Assistance	$1,000,000
Housing Rehabilitation	$3,3750,000
Clearance/Demolition	$220,000
Home Access	$4,383,969
Total	**$9,603,969**

The above funding distributions are preliminary estimates only. The Collaborative has the ability to shift funds within these housing program categories.

The activities outlined above are detailed in the Boulder County Collaborative CDBG-DR Partial Action Plan in Section 4 and represent the original funding provided under Round 2.

Round 3 Funding

The State has fully allocated the Collaborative's share of Round 3 funding in accordance with the Method of Distribution outlined previously. The Collaborative will continue to manage these funds in accordance with their submitted Partial Action Plan. In addition, the Collaborative clarified two eligible activities within their housing program:

- The relocation policy will include a provision for Uniform Relocation Act funding for households participating in the Hazard Mitigation Grant Program.
- Housing units that now require elevation due to revised post-disaster flood maps will be eligible for elevation assistance under the housing rehabilitation program as a necessary improvement.

Re-allocations

The State is providing 50% of re-allocated funds from the Economic Development Program to the Collaborative for a total amount of $7,183,700. The Collaborative will prioritize $200,000 for planning activities and the balance of $6,983,700 for a backlog of unfunded infrastructure priorities. The Collaborative will also receive $3,600,000 from Household Assistance and Housing New Construction to align resources with county-level damage estimates. The Collaborative will transfer the management of $4,000,000 in Housing New Construction for the Town of Lyons to the DOLA Division of Housing. These funds will remain committed to the Town of Lyons for the development of affordable housing. A history of allocations and summary of funding by program area can be found in Table 28 on page 40 (Method of Distribution).

Table 43: REMOVED – See Table 28

The Collaborative has the flexibility based on local needs to shift dollars from Housing programs to Infrastructure programs. Any shifts that exceed $1 million will require a Substantial Amendment including the requisite public process and submittal to the State and HUD for approval as the grantee.

National Objective
The State accepts the project evaluation and selection criteria the Collaborative has set to prioritize projects that serve a greater level of LMI households. Guiding Principles and Selection Criteria can be found in Appendix C of the Partial Action Plan. To meet the HUD requirement for 50% of their total sub-allocation to benefit low-to-moderate income (LMI) households the Collaborative will be allowed to count the Town of Lyons new construction projects toward their total although the management of those projects will now fall under DOLA's Division of Housing. As indicated in their Partial Action Plan to the State, the Collaborative has established targets that must be met in each program area in order to meet or exceed the overall requirement of 50%:

Table 44: BCC LMI Targets by Program Area

Program Area	Total BCC Allocation	LMI Target	LMI Requirement
New Construction – Lyons	$4,000,000	100%	$4,000,000
Household Assistance	$10,802,413	65%	$7,021,569
Infrastructure	$62,787,183	45%	$28,254,233
Total*	**$77,589,597**	**50.6%**	**$39,275,801**

*Does not include Planning dollars.
Note: The Town of Lyons new construction projects, now managed by DOLA's Division of Housing, will count toward the Collaborative's LMI Target. This will meet the 50% overall requirement.

The Collaborative will ensure that the above amounts are specifically set aside to serve LMI populations.

Boulder County Collaborative Responsibilities
The Collaborative has designated the City of Longmont as its Lead Agency. As such, the City of Longmont assumes administrator responsibilities to ensure the terms of the Intergovernmental Agreement[6] are upheld and all participating governments who are party to the agreement comply with CDBG-DR program requirements and the requirements as agreed upon in the Partial Action Plan. According to the Intergovernmental Agreement, each participating agency in the Collaborative will be responsible for managing all projects awarded and may establish its own procedures for contracting,

[6] FEMA Public Assistance does not fund activities related to creeks, therefore no FEMA data exists in this area.

expenditure and monitoring of funds, provided these procedures are consistent with CDBG-DR requirements. The City of Longmont will be responsible for on-site monitoring of these projects to monitor for progress, adherence to project activities as described, and to ensure records are maintained to demonstrate program compliance. The City of Longmont is required to provide monthly and quarterly performance reports to the State in accordance with state and federal requirements.

Implementation and State Monitoring

The State of Colorado will implement their monitoring program to ensure all participating governments carry out their activities in accordance with the respective regulations and agreements. The City of Longmont will act as the fiscal agent for the Collaborative. The State will monitor the City of Longmont for financial performance, project timeliness, record-keeping procedures and compliance with federal regulations and applicable program guidelines. Where potential problem areas are found, technical assistance and training will be provided. The State maintains responsibility for required quarterly reporting to HUD through the Disaster Recovery Grant Reporting System and will continue to manage the grant in accordance with the Action Plan, subsequent amendments and certifications.

Risk and Resiliency

In the days and weeks immediately following the floods, communities throughout the flood impacted areas, as well as the State of Colorado, made clear that the long-term recovery process was not just going to involve building back the way they were before the flood. Rather, this recovery process must build back stronger, better and more resilient than before.

Resiliency is something that Colorado communities and the State both recognize as central to the recovery process. It is what reduces the likelihood that homes and infrastructure are not damaged in the same way from the next disaster, that fewer jobs are lost and economies do not contract, and that Colorado's treasured watersheds and environment do not experience the same degradation from floodwaters and debris.

From the onset of the CDBG-DR program in 2014, the State injected core resiliency principles into guidelines and activities across all CDBG-DR programs through a multi-stage process. First, the State considered risk reduction and resiliency needs as a part of the impact and unmet needs analysis process. Next, as described during public hearings for the initial Action Plan and subsequent Substantial Amendments, the State identified overarching resiliency principles that were applicable to both flood and wildfire recovery. Finally, these principles were used to evaluate programs, identify eligible resiliency activities, and integrate criteria into program guidelines and application processes. The State's guiding resiliency principles for CDBG-DR programs are influenced by HUD's livability principles, as well as input from resiliency stakeholders at the state and local level:

- Empower risk-informed decision making – anticipate and mitigate against hazards (flood, wildfires, geologic hazards, etc.)
- Support equitable, affordable housing options
- Enhance economic competitiveness
- Coordinate and streamline policies; leverage recovery and resiliency investments
- Catalyze greater harmony between natural systems and the built environment
- Support and value incorporated and unincorporated communities and neighborhoods
- Provide more transportation choices

In June of 2015, Governor Hickenlooper adopted the Colorado Resiliency Framework. The Framework serves as Colorado's call to action and commitment to a resilient future. Within the Framework, the State defines resiliency as:

The ability to rebound, positively adapt to, or thrive amidst changing conditions or challenges - including disasters and climate change - and maintain quality of life, healthy growth, durable systems, and conservation of resources for present and future generations.

The Framework provides a concrete roadmap for action that informs Colorado's recovery efforts, as well as its forward-looking actions to reduce risk from future disasters. It includes goals, potential strategies and prioritization criteria, which in addition to the principles listed above, continue to inform CDBG-DR program and project activities. CDBG-DR programs may utilize the prioritization criteria to inform application processes and project monitoring and evaluation. Those prioritization criteria are:

Figure 15: Resiliency Prioritization Criteria

Resiliency Prioritization Criteria

State resiliency strategies and projects will be prioritized using the following criteria to ensure limited resources are leveraged for multiple, triple-bottom-line returns.

Co-Benefits
Address problems across multiple sectors to create maximum benefit.

High Risk and Vulnerability
Reduce risk to human well-being, physical infrastructure, and natural systems.

Economic Benefit-Cost:
Make good financial investments for both the investors and the broader community.

Social Equity
Include populations that are often most fragile and vulnerable to sudden impact.

Technical Soundness
Apply best practices that have been tested and proven to work in a similar regional context.

Innovation
Advance new approaches and techniques that maximize efforts and resources and serve as models for others in Colorado and beyond.

Adaptive Capacity
Consider future unknowns of changing climate, economic, and social conditions.

Harmonize with Existing Activity
Expand, enhance, or leverage work being done to build on existing efforts.

Long-Term and Lasting Impact
Create solutions that are replicable and sustainable, creating benefit for present and future generations.

Project Evaluation Considerations

In addition to the over-arching principles and prioritization criteria identified above, the State-identified resiliency factors are used to evaluate specific projects. Those program-specific factors are described below:

Housing Resiliency

Housing resiliency comprises two major components: public health and safety and market resiliency. Public health and safety includes risks from natural hazards such as floods, wildfires, geologic hazards and tornados, as well as environmental hazards such as asbestos and lead-based paint. Market resiliency includes availability of affordable housing units (for owners and renters), energy efficiency (and resulting cost savings for owners and renters), and the use of technology to enhance quality of life and cost savings. The following evaluation considerations may be used:

- Interaction with or proximity to identified hazard areas; compliance with NFIP standards, the State's Floodplain Rules and Regulations and local codes and land use regulations
- Abatement of environmental hazards
- Local vacancy rates and Fair Market Rent rate
- Incorporation of energy efficiency and technology
- Proximity to workforce opportunities, public services and transportation nodes

Infrastructure Resiliency

As required by the Federal Register, the State developed a Comprehensive Risk Analysis tool that guides the evaluation of infrastructure projects. The Comprehensive Risk Analysis tool will use existing plans and studies developed at the state and local level to identify weighted scoring criteria to assess risks to disaster impacted areas and the impact that future risks from natural hazards and changes in climate might have on infrastructure project proposals. Inputs to the Comprehensive Risk Analysis tool include:

- Local community plans including Hazard Mitigation Plans, Comprehensive Land Use Plans, Stormwater Plans, Emergency Operations Plans, and public health profiles
- State of Colorado Natural Hazards Mitigation Plan
- Flood Hazard Mitigation Plan for Colorado
- National Climate Assessment
- The Climate Change in Colorado Report (2014), which builds on the National Climate Assessment and identifies trends and impacts specific to Colorado

Utilizing the Comprehensive Risk Analysis tool and collection of information through the application process, the following evaluation considerations may be used as part of the State's efforts to establish resilience performance standards for projects:

- Risk from natural hazards and climate change (floods, fires, geologic hazards, etc.)
- Proximity to the 100-year floodplain (using National Flood Insurance Program maps or best available data)
- Project useful life (How long is the project designed to last? What maintenance will be required?)
- Project impact on the community's FEMA Community Rating System score (if applicable)
- Public health and safety impacts (i.e. critical access and evacuation routes, protection of critical facilities)
- Direct and indirect economic impacts (i.e. preventing loss of function of critical infrastructure, business interruption)
- Social impacts (benefits to access and functional needs or socially vulnerable populations, continuity of services)
- Environmental benefits (i.e. restoration of habitat, water quality, other natural and beneficial functions of floodplains)

Economic Development

The floods and fires had a significant economic impact on local communities. As described earlier in this document, the State estimates that there was approximately $556 million in economic impact. In many cases, the disaster inflicted economic damage on businesses that were not physically impacted by the disaster. Rather, the loss of tourism, the closure of access routes, and the overall disruption of economic activity resulted in loss of revenue, lost jobs, and closed businesses. The State has identified activities targeted at strengthening small businesses and local economies to better withstand these negative impacts in the future. For those activities – Business Technical Assistance – the following evaluation considerations may be used:

- Level of dependence of the local economy on specific economic sectors
- Business continuity and risk management capacity (or the need for further capacity)

- Economic impacts from the disaster, including sales tax revenue decline, disaster unemployment claims and loss of businesses
- Contribution to the long-term economic vitality / diversification of communities

Agriculture
The floods greatly impacted the agriculture community – ranches, farms, orchards and irrigation infrastructure all suffered significant damages. The following evaluation considerations may be used to evaluate those activities:

- Risk reduction – implementation of activities to reduce future damages
- Multi-objective approaches (i.e. fish passage)
- Resource efficiency (preventing evaporation, etc.)

Planning and Watershed
The Planning Program and the Watershed Resilience Pilot Program are specifically designed to promote resiliency through regional and cross-sector collaboration, engagement of the public at large, and to develop and implement plans and projects that reduce risk, restore or enhance the environment and wildlife habitat, promote economic and community development, promote development of affordable housing, implement fair housing practices and/or enhance quality of life. The following evaluation consideration may be used:

- Documented regional and cross-sector cooperation
- Public engagement
- Reduction of risk to homes, businesses, infrastructure and public facilities
- Identification of multi-objective approaches (i.e. hazard mitigation, habitat restoration, recreation, access to jobs and services)
- Social benefits (i.e. low-moderate income population served, # of people served)
- Environmental benefits (i.e. restoration of habitat, water quality, other natural and beneficial functions of floodplains)
- Community connectivity for economic and community development benefits across jurisdictions

Colorado Community Resiliency Partnership Fund
This program is based on the Colorado Resiliency Framework's identification of need for sustained funding and the leveraging of multiple resources to support ongoing community-based projects and programs that advance the future adaptability and resiliency of communities. As mentioned earlier, priority will be given to applicants who demonstrate: (1) commitment to implementing recommendations developed through funded plans or studies, (2) benefit to disadvantaged and most vulnerable populations in the region, (3) prioritization of efforts to address areas of high risk and vulnerability, (4) desire to cultivate and maintain lasting partnerships, and (5) innovation in approach, design or strategy to advance best practices. Applicants will be encouraged to utilize local or regional resiliency frameworks or strategies and the resiliency prioritization criteria identified within the Colorado Resiliency Framework to inform project design, implementation and monitoring.

Program Administration and General

The State is committed to the sufficiency of internal controls and procedures as outlined in the State's financial controls plan. These funds will be administered in accordance with the controls and procedures identified in the original Action Plan. Furthermore, the State certifies that it will meet or exceed all resilience standards as outlined in the Federal Register insofar as such compliance is economically viable and applicable to the unique circumstances of Colorado.

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 the U.S. Department of Housing and Urban Development (HUD). The plan reflects the alternative requirements as specified by 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 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.

The original Action Plan and all subsequent Substantial Action Plan Amendments followed the State's Citizen Participation Plan, which includes public notice, public hearings and the requisite comment period. Public comments were collected in person via public meetings, by U.S. mail, online through the Department of Local Affair's website and through webinar platforms. Public comments and responses were included and published with each Action Plan or Substantial Action Plan Amendment. The State has conducted outreach to community groups, including those that serve minority populations, persons with limited English proficiency, and persons with disabilities. Spanish translators and sign language interpreters were made available at public hearings, and facilities where public hearings were held were Americans with Disabilities Act compliant. A summary of public events is as follows:

- *Initial Action Plan:* Public meetings were held January 21-23, 2014 in Boulder, Larimer and Weld counties followed by a webinar for those who could not attend in person conducted on January 24, 2014. Meetings were held in the evenings to increase participation rates by citizens. A second round of meetings was conducted February 11-13, 2014 in El Paso, Boulder, Larimer, and Weld counties.

- *Substantial Amendment 1:* The State held five public hearings August 11-18, 2014 in Boulder, El Paso, Larimer and Weld counties. A Town Hall webinar was also conducted on August 15, 2014 for those citizens unable to participate in person.
- *Substantial Amendment 2:* The State held five public hearings April 13-20, 2015 in Boulder, El Paso, Larimer and Weld counties. A Town Hall webinar was also conducted in the City of Loveland on April 17, 2015 for those citizens unable to participate in person.
- *Substantial Amendment 3:* This amendment primarily provided the Boulder County sub-allocation. The Boulder County Collaborative conducted four public hearings in the City of Boulder, the City of Longmont, The Town of Jamestown and the Town of Lyons from March 12 to April 1, 2015. The State followed up with a combined public meeting and webinar for the overall amendment in Boulder County on July 16, 2015.
- *Substantial Amendment 4:* This amendment provided further clarification on Economic Recovery programs and introduced HUD waivers regarding the Disaster Risk Reduction Areas and the use of USDA eligibility criteria for the Agriculture Business Grant Program. The changes were minor, but slight changes in eligibility criteria warranted public comment. The State provided public notice, contacted relevant stakeholders and conducted a webinar town hall on January 20, 2016.
- *Substantial Amendment 5:* This amendment combined the original Action Plan and all subsequent amendments into a single, revised Action Plan. It provided 3rd allocation funding to the Boulder County Collaborative, combined the Watershed and Ditch programs into a single program and provided more flexibility across Planning programs. It also removed language regarding utilities under the Watershed Implementation program and transferred additional planning dollars into the environmental review program. The State provided public notice, contacted relevant stakeholders and conducted a public meeting and webinar in the City of Longmont on May 25, 2017.
- *Substantial Amendment 6:* This amendment reallocated funds in accordance with a reassessment of priorities. Economic Revitalization programs were reduced and funds shifted to infrastructure and other priorities. Funds from the Division of Housing (DOH) were transferred to the Boulder County Collaborative (BCC) to align with damage estimates. Funds management for Housing Construction in Lyons was transferred from BCC to DOH. Also, it streamlined the public participation period from 30 days to 7 days. The State provided public notice, contacted relevant stakeholders and conducted a public webinar on November 30, 2017.
- *Substantial Amendment 7:* This amendment funded an additional $1.2 million for the Resilient St. Vrain Project utilizing unused funds in the Housing New Construction and Watershed Capacity programs. It also adjusted the threshold for a substantial amendment from $1M to $3M. The State provided public notice, contacted relevant stakeholders and conducted a public webinar on September 26, 2019.

Dates and locations of each of these events were included in the original Action Plan or amendments. These original documents are archived on our website at www.dola.colorado.gov/cdbg-dr.

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. Previously, 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 were conducted in continuation of the immediate disaster response process, ensuring continual communication between stakeholders at all levels of the recovery effort.

Amendments to Action Plan

The State will require public notification and comment procedures as indicated above 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 $3 million from one major program area to another (the four major program areas area Housing, Infrastructure, Economic Development and Planning); or
- The addition or deletion of any allowable activity described in the approved application.

For other Non-Substantial Amendments, the State shall notify HUD, but public comment is not required. Every amendment, substantial or non-substantial, will be documented in the version history of the Action Plan, incorporated into the single Action Plan, and posted on the DOLA website.

Program Income

The State anticipates generating program income for housing and economic development-related activities. Any program income generated or returned to the State will be used 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 in DRGR and will follow the CDBG-DR Program Income guidelines. In accordance with the Interagency Agreement between the City of Longmont and the Colorado Department of Local Affairs, the City of Longmont has the authority to act on behalf of the Boulder County Collaborative and may retain program income and reinvest it in disaster recovery projects, transfer program income to the regular CDBG program or allow their sub-recipients to retain program income in accordance with the March 5, 2013 Federal Register Notice.

Monitoring Standards and Procedures

The DOLA Disaster Recovery Unit has developed monitoring guidelines and a monitoring plan that includes detailed checklists for the each of our subgrantees in the necessary areas of compliance. Each of the agencies responsible for implementing programs including the Division of Housing, Division of Local Governments, Office of Economic Development and International Trade, the Division of Homeland Security and Emergency Management, and the City of Longmont on behalf of the Boulder County Collaborative are responsible for following the DOLA DR Monitoring Plan, which includes a risk assessment of their sub-recipients and creating a monitoring schedule. All monitoring of sub-recipients will include use of the checklists and the resulting monitoring reports to be posted centrally to DOLA's CDBG-DR Monitoring and TA Tracker to inform the Compliance Specialist and partner agencies.

Verification for the prevention of duplication of benefits will be part of all program procedures including procedures for additional/subsequent funds received by applicants (i.e. subrogation policies). At a minimum, the State will require that all CDBG-DR applicants submit documentation supporting their funding request amount 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 using the detailed checklists including site visits 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, environmental review and procurement. 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.

Reporting for Public Purposes

The DRGR reporting system will be configured to capture activity budgets, performance measures, obligations, expenditures, administration costs, and national objectives. The State is required by HUD to submit a Quarterly Performance Report and post those reports on DOLA's CDBG-DR website. Quarterly reports are submitted 30 days following the end of the quarter. In addition, the State will continue to post overall funding allocations and expenditure rates.

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, subgrantees 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 Department of Local Affairs and its partner agencies at the Division of Homeland Security and Emergency Management, Office of Economic Development and International Trade 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 Department of Local Affairs Disaster Recovery Unit and the implementing agency will track expenditures and ensure appropriate schedules are met or funds are re-allocated appropriately.

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.

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. If funds cannot be awarded within the same category, a Substantial Amendment will be submitted to transfer funds to other programs with additional projects that are ready to implement. For any transfers to housing or infrastructure, a proportional share will be awarded to the Boulder County Collaborative provided they have a current list of recovery projects in need of additional funds. At a minimum, the State will ensure the three most impacted counties receive 80% 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

In conjunction with the DOLA Accounting and Financial Services staff, the DOLA CDBG-DR Anti-fraud, Waste and Abuse (AFWA) policy has been established for the detection and prevention of potential fraud, waste, and abuse in the CDBG-DR grant program. It is the intent of the DOLA CDBG-DR program to promote consistent organizational behavior by providing guidelines and assigning responsibility for the management of the AWFA function. Any fraud, waste or abuse that is suspected, discovered or reported within the CDBG-DR programs will be documented and reviewed. An approved, written disposition will be developed and implemented by the CDBG-DR Financial Compliance Officer. The AFWA policy and contact information is posted on the DOLA CDBG-DR website.

Duplication of Benefit

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 sub-recipient will verify the reported information with a 3rd party.

All CDBG grant and loan programs 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. For activities that the State carries out directly or through subgrantees, State staff who typically underwrite applications will complete the calculation to determine the maximum eligible award and ensure no duplication of benefits occurs. 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, subgrantees and sub-recipients shall not engage in any business or personal activities or practices or maintain any relationships that conflict in any way with the full performance of an applicant's obligations. Absent the State's prior written approval, subgrantees and sub-recipients shall refrain from any practices, activities or relationships that reasonably appear to be in conflict with the full performance of the subgrantee's and sub-recipient's obligations to the State. If a conflict or appearance exists, or if it is uncertain whether a conflict or the appearance of a conflict of interest exists, the subgrantees 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.

Appendix A: Disaster and Demographic Data

This appendix includes data, tables, figures, and text that were originally contained within the main sections of the Action Plan. The State collected this information immediately following the floods to provide context, enhance the State's understanding of impact and unmet need, and to inform design of CDBG-DR programs. This information will remain in this appendix as background and will not be further updated.

Housing Data

The following section contains demographic and housing data that informed a broader understanding of disaster impacts and the consequences to the larger housing market.

Demographic Profile of the Impacted Area

The Action Plan accounts for the most recently available demographic data including flood and fire impacted areas. Colorado reaffirms its commitment to fair housing and providing disaster recovery services to its constituents regardless of demographic status and in special consideration of minority, special needs, low and moderate income, and elderly populations.

Owner Occupied Properties

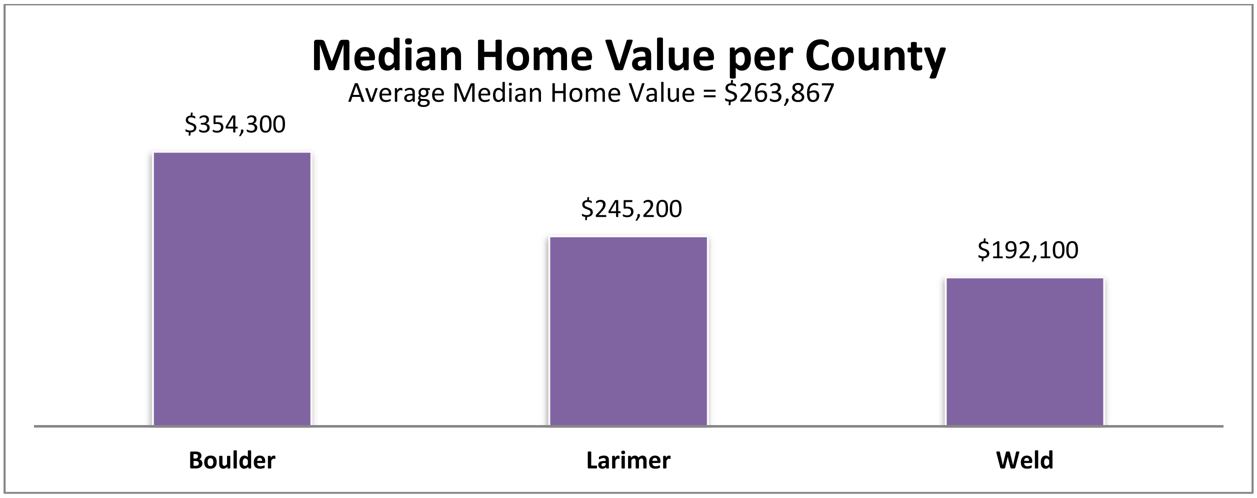
Homeowners throughout the State of Colorado were significantly affected by the flooding. Owner occupied units make up approximately 66% of housing stock in Boulder, Larimer, and Weld counties. The information below highlights the existing conditions of the housing market for owners and renters at the time of the floods.

Table 45: Owner Occupied Properties/Units – Source: ACS 2008-2012

County	Owner Occupied	Total Housing	Percent Owner Occupied
Boulder	75,992	120,061	63%
Larimer	79,839	120,592	66%
Weld	63,105	89,553	70%
Total	**218,936**	**330,206**	**66%**

Median home values are significantly higher in Boulder than in Larimer and Weld, 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.

Figure 16: Median Home Value per County as of 2013



Impact on Rental Stock

Based on current data, rental properties make up approximately 34% 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%.

Table 47: Rental Properties / Units – Source: ACS 2008-2012

County	Rental Units	Total Housing Units	Percentage
Boulder	44,069	120,061	37%
Larimer	40,753	120,592	34%
Weld	26,448	89,553	30%
Total	**111,270**	**330,206**	**34%**

Using data from the ACS 2008-2012 5Y information, Table 48 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%. This is much higher when compared to the vacancy rates for Fremont, Morgan, and Boulder at a 2.5% average. The average for all 18 counties' rental vacancy rates is approximately 8%. A 5% vacancy rate is considered healthy for a community in Colorado.

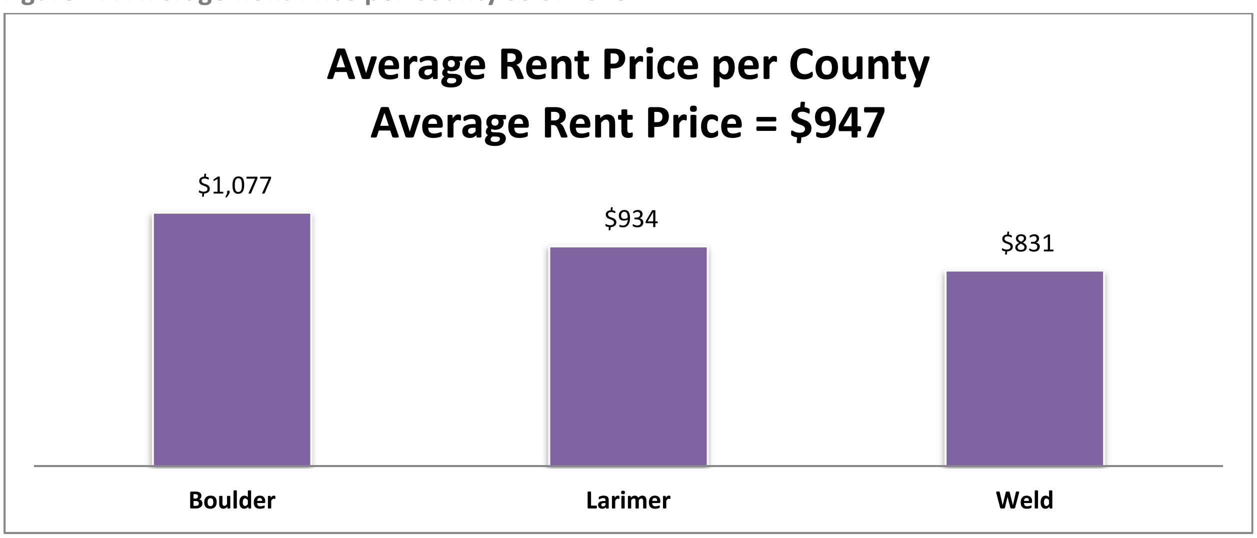
Table 48: Rent Rates per County

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%**

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.

Figure 17: Average Rent Price per County as of 2013



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.

Table 49A: Apartment Market Data: Vacancy Rates – Source: Apartment Insights Data

Census Area	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%**

Table 49B: Apartment Market Data: Average Rent – Source: Apartment Insights Data

Census Area	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%**

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 the homeless will operate the housing programs.

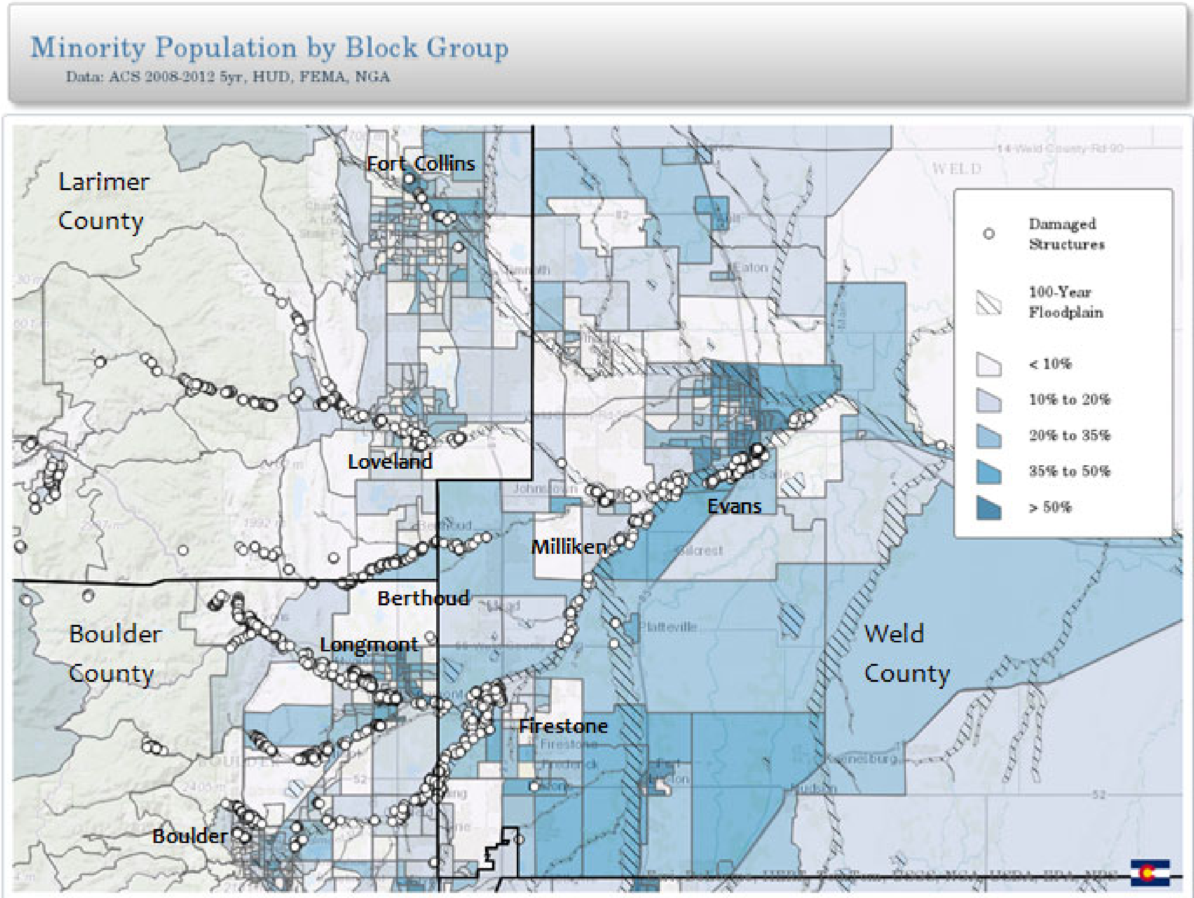
Table 50: Homeless Population – Source: 2013 Point-In-Time Survey

County	Homeless Population
Boulder	**2,366**
Larimer	**324**
Weld	**331**

Table 51: Summary Demographic Data

County	Households	Median HH Income	% Housing Over 65	% Black	%Asian & Haw/Pacls	%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%

Figure 18: Minority Population by Block Group



Economic Data

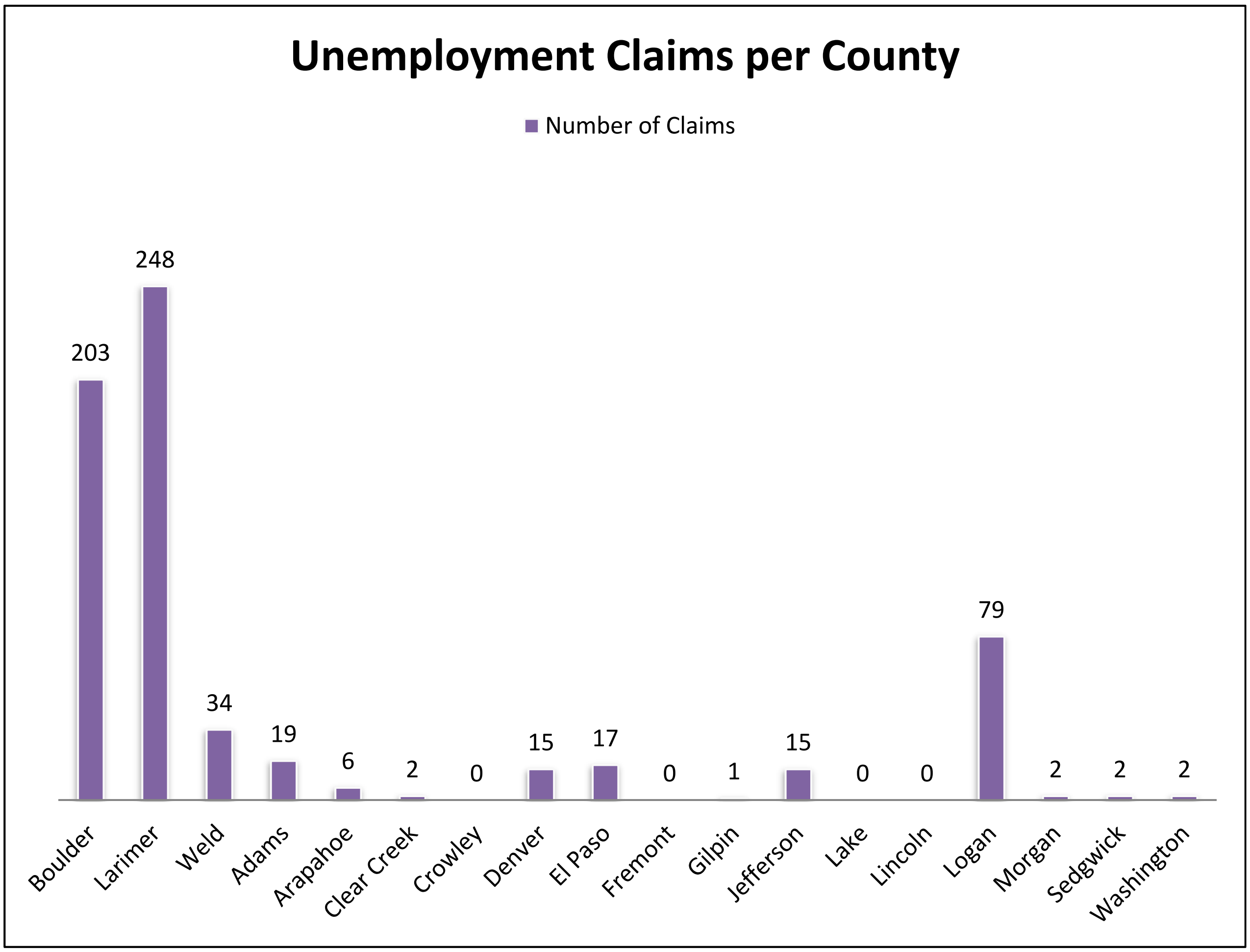
The floods significantly impacted employment. Unemployment claims immediately after the flooding were the highest in two of the most impacted counties - Boulder and Larimer. Logan and Weld counties also had a high number of claims.

Table 52: 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

County	Number of Claims
El Paso	17
Fremont	0
Gilpin	1
Jefferson	15
Lake	0
Lincoln	0
Logan	79
Morgan	2
Sedgwick	2
Washington	2

Figure 19: Unemployment Claims per County



Appendix B: FEMA Disaster Declaration by County

Presidential Disaster Declaration				
County	DR-4067	DR-4133	DR-4134	DR-4145
Boulder				X
Larimer	X			X
Weld				X
Adams				X
Arapahoe				X
Clear Creek				X
Crowley				X
Denver				X
El Paso	X		X	X
Fremont		X		X
Gilpin				X
Jefferson				X
Lake				X
Lincoln				X
Logan				X
Morgan				X
Sedgwick				X
Teller	X			
Washington				X

Appendix C: Covered Project Additional Information

The June 3, 2014, Federal Register (79 FR 106) requires specific information to be included in the Action Plan for any project that meets the threshold of a "covered project". A "covered project" is a major infrastructure project that exceeds $10 million of CDBG-DR funds and/or $50 million in total. With additional funding provided through Action Plan Amendment #7, the Resilient St. Vrain Project exceeds that threshold. This appendix provides that required information.

Project: Resilient St. Vrain Project

<u>Identification/Description</u>

Background
Longmont is located in Boulder County approximately 30 miles north of Denver. St. Vrain Creek is the primary stream in the region and a major drainage within the South Platte River Basin. It originates at the continental divide, collects drainage water within Boulder County, including at the confluence of Left Hand Creek and Boulder Creek, and conveys flows to the South Platte River at their confluence approximately 20 miles northeast of Longmont.

The alignment of St. Vrain Creek was drastically altered throughout Longmont during the presidentially declared disaster flood event that occurred in September 2013. Catastrophic flooding caused extensive damage in the Longmont area, damaging both public infrastructure and private property. Damage to

Longmont St. Vrain Creek Flooding, September 2013 public infrastructure included roads and bridges, water and sewer utilities, parks and trails, and public buildings. Flows passed through both commercial and residential neighborhoods, damaging homes and businesses. Likewise, the flood resulted in environmental damage to St. Vrain Creek, its banks, and surrounding riparian corridor. In various locations, the Creek migrated laterally; experienced significant in-stream and off-channel erosion and deposition of materials such as rocks, cobble, sand, trees, and trash; cut new overbank channels; lost a significant amount of its riparian ecological function; and migrated or scoured to the point of destroying numerous utilities, roads, embankments, and bridges.

Project Description

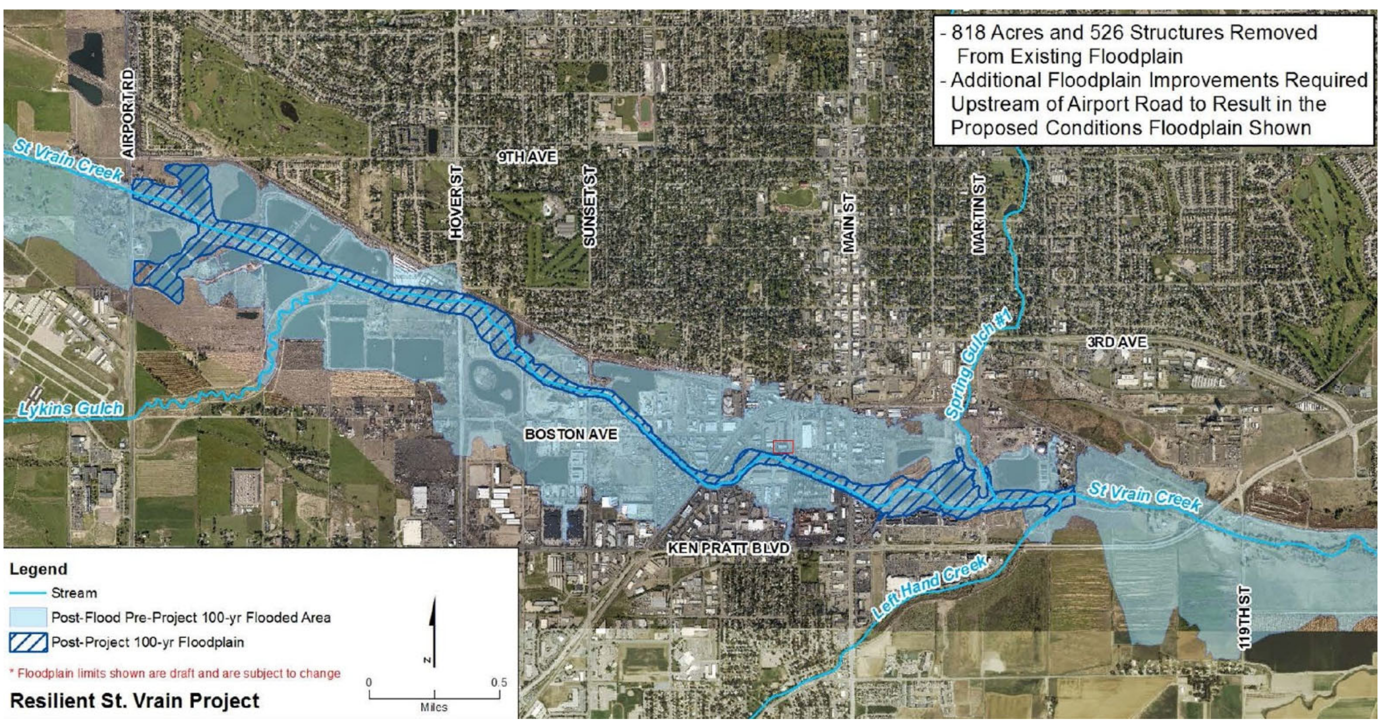
The Resilient St. Vrain Project (RSVP) proposes to restore and improve the condition of the St. Vrain Creek from approximately Airport Road at the upstream end to the confluence with Boulder Creek at the downstream end, see figure below.

RSVP Full Extent

The purpose of the project is to repair flood damage, protect infrastructure, improve public safety and health during future flood events, and to preserve, restore, create, and enhance the natural and beneficial functions, values, and characteristics in the St. Vrain Creek corridor. Channel and floodplain improvements as part of the project will achieve the following:

- Repair damage to the greenway trail to restore recreational opportunities, and restore and enhance the natural values of the existing greenway.
- Stabilize and repair the Creek channel to restore and ultimately increase its flood conveyance capacity to contain the 100-year flood event.
- Promote resiliency by reducing the economic and physical effects of flooding on the community.
- Improve emergency access during future flood events. The City of Longmont and other Front Range communities along St. Vrain Creek had restricted emergency access for several days during the 2013 Flood because of washed out and flooded road and bridge crossings.
- Promote the environment by using natural restoration techniques to maintain and improve fish passage and habitat, wildlife habitat, the natural riparian setting, and the greenway corridor.
- Maintain or improve existing natural habitat conditions and, where possible, provide conditions that allow natural restoration of the Creek and its riparian habitat.
- Minimize land use changes and preserve the value of existing parks, trails, and open space land uses.

Once completion of improvements up to Hover Street occurs, 818 acres and 526 structures will be removed from the mapped 100-year FEMA regulatory floodplain, significantly reducing risk to life and property and reducing the need for residents, including low-moderate income residents, to purchase flood insurance. The figure below highlights the before and after condition of the mapped floodplain through the City.



Before and After RSVP Project 100-Year Floodplain Extent (Sandstone Reach not shown)

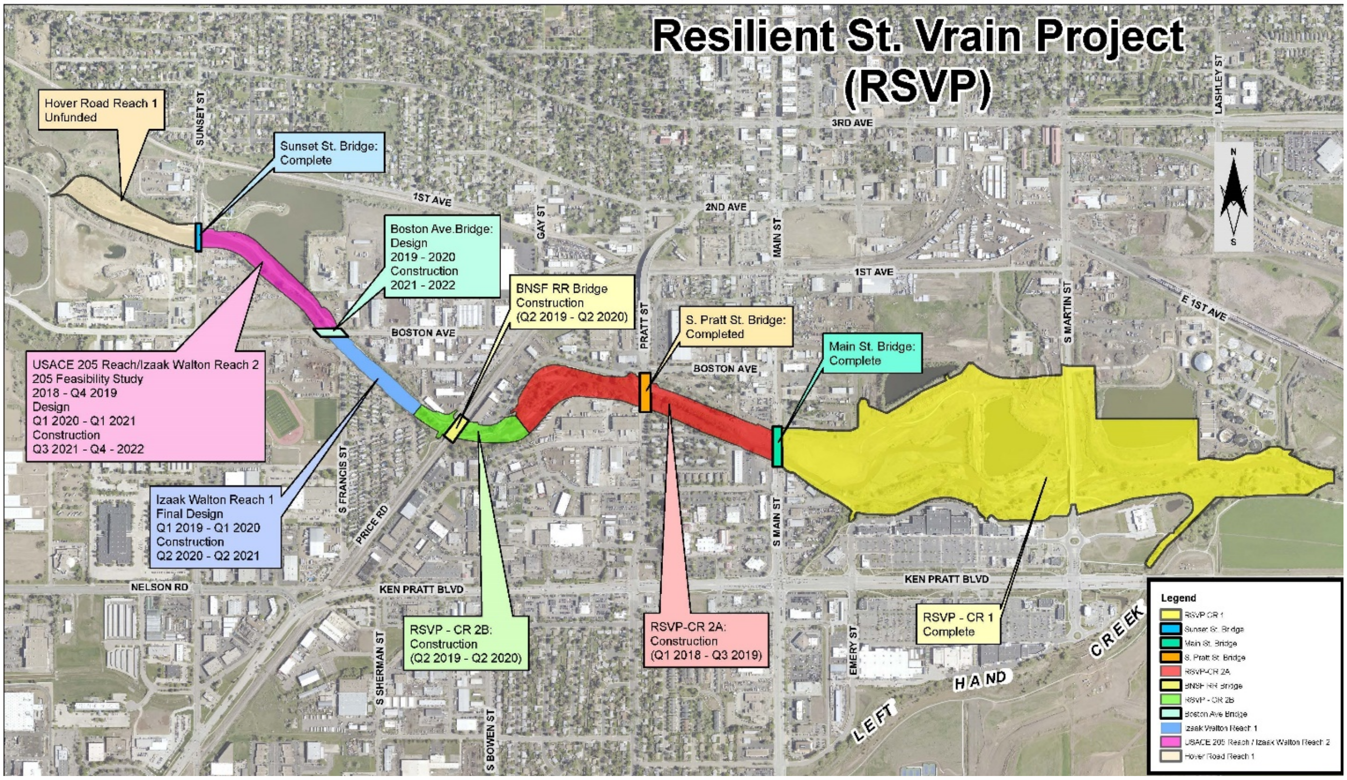
Project Funding

The anticipated cost for the entire project is approximately $140 million. Funding sources include $20 million in voter-approved Storm Drainage Bonds, Federal Emergency Management Agency (FEMA), Community Development Block Grant-Disaster Recovery (CDBG-DR), U.S. Army Corps of Engineers (USACE), , Great Outdoors Colorado (GOCO), State and County funds, and other existing City funds, including the 3/4-cent Street Fund sales and use tax renewed by voters in 2014. The project is not fully funded at this time and the City is actively seeking funding sources to complete the project.

RSVP Project Segments

The RSVP project is separated into eight segments that must be constructed from downstream to upstream in order for the segments to function effectively in the event of a large runoff event before completion of the full project. The figure below shows the limits of the segments currently in active planning or construction and the completion status. The channel improvements are also dependent on five bridge replacement projects, three of which are complete, one is being funded as part of City Reach 2B, and one is currently in design.

- **Sandstone Ranch Reach –** primarily FEMA-funded, construction complete in spring 2018.
- **City Reach 1 (Left Hand Creek confluence to Main Street) –** primarily FEMA-funded, construction complete in summer 2018.
- **City Reach 2A (Main Street to west of South Pratt Parkway) –** primarily FEMA-funded with substantial City participation using local funds, construction complete as of September 2019.
- **City Reach 2B (west of South Pratt Parkway to west of BNSF Railway Bridge) –** primarily CDBG-DR-funded, construction began in July 2019 and is proposed to complete in July 2020.
- **Izaak Walton Reach 1 –** primarily FEMA-funded with substantial City participation using local funds, construction anticipated in 2020.
- **Izaak Walton Reach 2 –** USACE and City-funded (USACE preliminary study has been approved, but final funding not yet secured), construction anticipated in 2021.
- **Hover Road Reach –** Currently unfunded.
- **Airport Road Reach –** Currently unfunded.



RSVP Project Segments (Sandstone Reach and Airport Road Reach not shown)

CDBG-DR-funded City Reach 2B

The scope of work for City Reach 2B includes creek channel improvements to safely convey 100-year flood flows, increasing the size of the riparian area by 5.99 acres and creating space for a meandering low-flow and wetland habitat, greenway trail relocation and improvements, demolition and reconstruction of the pedestrian bridge connecting the St. Vrain Mobile Home Park to the greenway trail, demolition and reconstruction of the BNSF railway bridge and associated tracks capable of passing 100-year flows, storm drainage improvements, water line and dry utility relocations, site revegetation, and property acquisitions conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, to accommodate the shifted, larger channel.

City Reach 2B is eligible for CDBG-DR funds under the Public Facilities & Improvements category described at 24 CFR §570.201(c). This project will meet the low-moderate income area-wide benefit national objective; it has been determined to serve a primarily residential area, including the St. Vrain Mobile Home Park, a community consisting of 91 percent low-moderate income households.

At the time of award of CDBG-DR funds to City Reach 2B in October 2018, CDBG-DR funding was proposed to exceed $10 million, but the funded reaches of RSVP as a whole did not exceed $50 million. Since that time, additional funding has been secured for reaches upstream of City Reach 2B that cause the full project cost to exceed $50 million, thereby meeting the threshold for a Covered Project described in the June 3, 2014, Federal Register notice. Current secured or anticipated funding through Izaak Walton Reach 2 totals approximately $76 million.

Use of Impact and Unmet Needs Assessment and the Comprehensive Risk Analysis

The Boulder County Collaborative (BCC) updated the CDBG-DR Unmet Needs Assessment (UNA) on January 13, 2017, to support the State's Amendment to the Action Plan for the allocation of Round 3 funding, approved June 27, 2017. RSVP was addressed in the UNA sections on FEMA match unmet needs on page 39 and resiliency needs on page 77.

The 2014-2019 Boulder County Natural Hazard Mitigation Plan meets the requirements for a Comprehensive Risk Analysis set forth in the June 3, 2014, Federal Register. This plan meets the requirements because it is a science-based analysis, it considers a broad range of information and best available data, and it includes a forward-looking analysis of risks to infrastructure sectors from climate change and other hazards.

Based on the analysis in the Hazard Mitigation Plan, the probability of a future flood event in Boulder County is occasional to highly likely, and the magnitude and severity is classified as critical, with a significant threat to public safety. Therefore, based on these vulnerability assessments, the hazard significance for flooding is considered high.

The natural hazard event that RSVP is primarily intended to address is flooding. Due to the number of commercial/ industrial structures and dwelling units located within the existing 100-year floodplain within the project area, and the high risk factor, this is considered a priority project for CDBG-DR funding. Providing CDBG-DR funding for RSVP City Reach 2B will result in a significant reduction in risk of loss to life and property from another high flow event on St. Vrain Creek, reducing Longmont's vulnerability and increasing resiliency for future generations.

Transparent and Inclusive Decision Processes

Because both the operational effectiveness and constructability of RSVP City Reach 2B is dependent on the funding and completion of prior phases of the project, the decision to fund just the CDBG-DR-funded segment is congregated into the funding decisions that have gone into RSVP as a whole. Transparent and inclusive processes used in the selection of RSVP for funding and for design feedback generally consist of regular updates at public City Council meetings and City Advisory Board meetings, public hearings required by federal processes, community engagement events, targeted stakeholder meetings, online resources and multi-media, direct mailings and hand-delivered fliers to affected businesses and residents, and three CDBG-DR Action Plan public hearings to date, including the one held September 26th, 2019 for consideration of this Action Plan Amendment. Additionally, Longmont voters approved a Storm Drainage Bond intended in part to fund RSVP in June 2014.

Specifically, RSVP has been presented to the public at not less than 30 community events since 2015, including various project open houses, the annual preparedness/resilience fair, flood anniversary commemoration ceremonies, public hearings for related planning efforts such as the Wildlife Management Plan and the Main Street Corridor plan, presentations on the Colorado Hazard Mapping Program (CHAMP), and cultural events such as Rhythm on the River and the Front Range Film Festival. Longmont staff has held scoping meetings for targeted stakeholders including adjacent property owners, Colorado Parks and Wildlife staff, Neighborhood Group Leaders Association (made up of homeowners associations and other formal and informal neighborhood groups), Longmont Area Chamber of Commerce, Longmont Economic Development Partnership, and Longmont Association of Realtors. Presentations to Longmont civic groups including Lions, Kiwanis, and Optimist Clubs have reached several hundred additional interested community members.

All City Council meetings and public hearings are provided in accessible facilities or formats. The City's webpage for the project is offered in Spanish. The City Customer Service Center includes staff who are fluent in Spanish, and an on-demand language line is available for callers who prefer to converse in other languages. Spanish translators have been provided for project open house and outreach events. Spanish-speaking City staff distributed project fliers and open house invitations by hand within the St. Vrain Mobile Home Park, the low-moderate income neighborhood adjacent to the CDBG-DR-funded City Reach 2B segment. Because established relationships had been forged with members of this community throughout flood recovery and the City's regular CDBG grant programs, this outreach method was particularly successful in increasing awareness of the project and attendance at stakeholder events.

Due to the sheer scale of need for St. Vrain Creek floodplain protection through the center of Longmont and the proportion of direct benefits provided by RSVP, this project was the top priority for the City for CDBG-DR funding. Factors weighed in this decision included the substantial outstanding unmet need and the likelihood of availability of future funding for a project of this magnitude, the financial and safety benefits to businesses and residents in the project area, ecosystem benefits, and reduction of future disaster damage. These benefits and other project impacts were presented to the public via each of the outreach methods discussed previously.

Long-Term Efficacy and Fiscal Sustainability

RSVP City Reach 2B was designed in coordination with the BCC's Resilient Design Performance Standard (RDPS), created to satisfy the requirements of the June 3, 2014, Federal Register. The RDPS includes a tool to measure and evaluate the project's resiliency and sustainability elements. As resilient project elements are inclusive of outreach and adaptive design processes adopted throughout construction, RSVP City Reach 2B's RDPS analysis is a living document that will be adapted and referenced as a guide for the life of project construction. In this way, BCC and Longmont staff will continuously monitor the efficacy and sustainability of the project throughout implementation.

In the long term, the St. Vrain Creek channel will be maintained and monitored to ensure that the improved flow conveyance capacity is retained. The City is preparing a detailed maintenance plan that will maintain the channel in accordance with the design criteria utilized on the project.

The City of Longmont Financial Policies adopted by the Longmont City Council include the following Financial Policy related to the Resilient St. Vrain Project:

> **Resilient St. Vrain Project**
> The City shall at all times operate the project properly and in a sound and economical manner; and the City shall maintain, preserve and keep the project properly or cause the same to be maintained,

preserved, and kept, with the appurtenances and every part and parcel thereof in good repair, working order and condition, and shall from time to time make or cause to be made all necessary and proper repairs, replacements and renewals so that at all times the operation of the project may be properly and advantageously conducted.

Space has been provided in the redesigned channel for a natural, meandering stream that has room to shift and adapt with changing environmental conditions without risking the primary project purpose of safely passing higher flows.

Environmentally Sustainable and Innovative Investments

RSVP is a national model for a large-scale flood mitigation project with the co-benefits of improving our natural defenses against extreme weather, protecting biodiversity, and conserving natural resources. RSVP will significantly reduce the risk to life and property for Longmont residents and businesses while improving ecosystem function and re-introducing natural conditions to an urban stream highly impacted by human influence. The project balances the needs of the natural environment and urban development, with the added benefits of new recreational facilities that improve multi-modal connections, increase opportunities for humans to interact with nature, and add educational elements to learn about Longmont's historic, natural, and water resources.