



CDBG-DR Action Plan Summary

Community Development Block Grant-Disaster Recovery (CDBG-DR)
City of Philadelphia
Amendment #1 (Substantial)
Submitted to HUD: xx/xx/xxxx
Effective Date: xx/xx/xxxx

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1.1 Introduction

This document summarizes the City of Philadelphia’s [Community Development Block Grant-Disaster Recovery \(CDBG-DR\)](#) Action Plan for Hurricane Ida, including:

- Disaster Impact
- Unmet Needs, and
- Proposed Activities.

To request a translation of the complete Action Plan, please email CDBG-DR@phila.gov, or call 215-686-2643. Interpretation and translation are provided free of charge.

The City submitted its initial Action Plan to HUD for review on August 21, 2023. HUD approved the City’s Action Plan on October 19, 2023.

1.2 CDBG-DR Overview

In 2022, the U.S. Department of Housing and Urban Development (HUD) announced that the City of Philadelphia would receive \$163,204,000 in funding to support long-term recovery efforts following the remnants of Hurricane Ida (Hurricane Ida) and Disaster Declaration FEMA-4618-DR. CDBG-DR funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in Philadelphia.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$163,204,000 in CDBG-DR funds to the City of Philadelphia in response to Hurricane Ida, through the publication of the [Federal Register, Vol. 87, No. 100, May 24, 2022](#) and [Federal Register, Vol. 88, No. 11, January 23, 2023](#). This allocation was made available through the [Disaster Relief Supplemental Appropriations Act, 2022 \(Public Law 117-43\)](#) and the [Continuing Appropriations Act, 2023 \(Public Law 117-180\)](#).

1.3 Action Plan Amendment Overview

Action Plan amendments serve as a way to propose revisions to CDBG-DR Action Plans in order to add or clarify information; change or add additional activity or program benefits; or reduce, increase, or reallocate funding. Amendments are categorized as either substantial or non-substantial.

Substantial Amendments

Substantial amendments meet the following thresholds:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A proposed reduction in the overall benefit requirement;

- Or the allocation or reallocation of a monetary threshold specified by the grantee in their action plan.

Residents will be provided with reasonable notice and an opportunity to comment on proposed substantial amendments to the Action Plan, as required by HUD. A notice and translated copies of the proposed substantial amendment will be posted on the City's CDBG-DR website. Copies will be provided upon request at the City, if otherwise not accessible for review by any residents. Residents will be provided with no less than 30 days to review and comment on the proposed substantial amendment.

Non-Substantial Amendments

Proposed amendments with minor changes that do not materially alter activities are eligible beneficiaries are considered non-substantial. Non-substantial amendments are not subject to legal notice and public comment requirements.

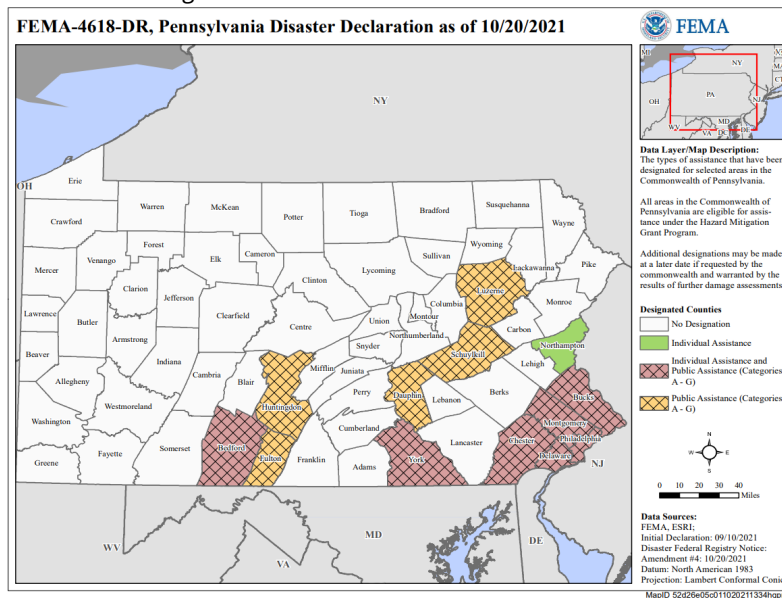
Amendment 1 Summary

Through this proposed substantial amendment to its Action Plan, the City is updating the existing Economic Revitalization framework with programmatic and implementation details regarding the CBDG-DR Small Business Grant Program.

The City has also made minor changes to the names of funded programs in an effort to simplify them and more clearly differentiate programs from each other. A 30-day public comment period will ensue 30 days after the legal notice for Proposed Action Plan Amendment #1 is posted online.

1.4 Disaster-Specific Overview

Figure 1: FEMA Disaster Declaration 4618-DR



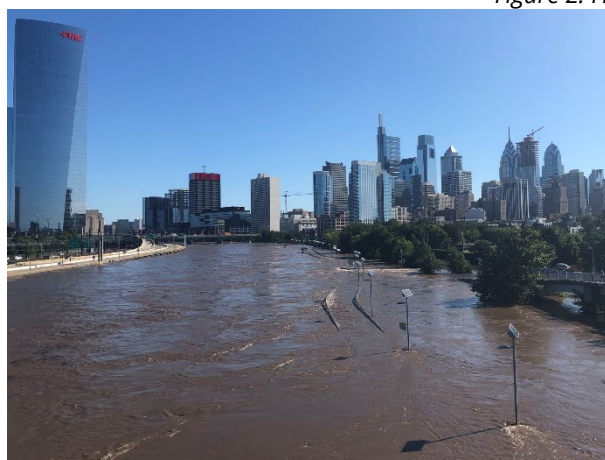
In September 2021, Hurricane Ida, which was later downgraded to a tropical storm, reached southeastern Pennsylvania. The Philadelphia area experienced heavy rains, high winds, and severe flooding. The rainfall rates and flooding impacts witnessed during this event were unprecedented, with certain parts of the city receiving between 3.97 to 5.69 inches of rain within a twelve-hour period, and some neighborhoods experiencing such levels of rainfall in as little as three to six hours. In Northwest Philadelphia, rainfall exceeded three-and-a-half inches within a three-hour period of the event and nearly five inches within a six-hour period. This excessive rainfall overwhelmed the local stormwater management systems and waterways, leading to widespread flooding across the region. The City's water gauges, which monitor the water levels in six major waterways, collected data on flood heights throughout the event. Both the Schuylkill River and Pennypack Creek gauges recorded water levels that surpassed the major flood stage. For specific flood height information for each of the monitored waterways, please refer to the table provided below.

Table 1-1: Water Levels

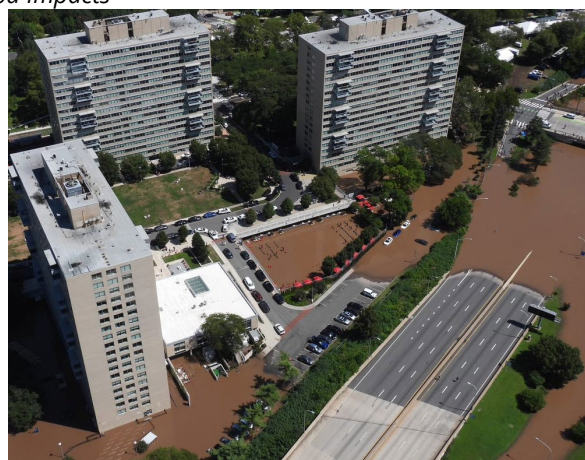
Body of water	Highest level during Ida	Major flood stage
Schuylkill River	16.35	15.5
Cobb's Creek	2.52	Not Available
Wissahickon Creek	9.34	Not Available
Delaware River	9.72	10.2
Pennypack Creek	14.57	11
Frankford Creek	8.97	10

Overall, Hurricane Ida's arrival in southeastern Pennsylvania, particularly in Philadelphia, resulted in significant damage due to heavy rains, strong winds, and severe flooding. The rainfall rates observed were historically high, causing the inundation of stormwater management systems and waterways. The flood heights recorded by the City's water gauges serve as a testament to the magnitude of the event and its impact on the region.

Figure 2: Flood Impacts



Schuylkill River looking north



Schuylkill River flooding

1.4.1 Disaster Impacts and Funding Needs

Based on the City's initial analysis, City needs for CDBG-DR funding can be grouped into five main categories:

- Water, Sewer and Stormwater Infrastructure Damage and Vulnerability
- Public Infrastructure and Critical Facility Resiliency
- Single-Family Homes, Small Buildings, and Affordable Housing
- Local Businesses Impacts
- Recovery and Resiliency Planning

Water, Sewer and Stormwater Infrastructure Damage and Vulnerability

The impact of Hurricane Ida on Philadelphia revealed a pressing need for the restoration and improvement of the city's aging water, sewer, and stormwater infrastructure. The vulnerabilities of Philadelphia's infrastructure were exposed during the storm, as pump stations and critical facilities nearly failed to cope with the magnitude of the event. The system was pushed to its limits, and if additional infrastructure failed, the situation could have escalated into a crisis.

Severe storms like Hurricane Ida will continue to have devastating effects on the water system, causing disruptions for residents ranging from a few hours to several weeks. It is evident that the existing infrastructure is ill-equipped to handle such events, and there is a significant need to enhance the resiliency and reliability of Philadelphia's water, sewer, and stormwater systems.

Public Infrastructure and Critical Facility Resiliency

Hurricane Ida had a significant impact on Philadelphia's aging infrastructure, resulting in disruptions to transportation and the closure of important parks and recreational assets. The storm's effects were particularly felt along trails situated near waterways, such as the Manayunk Canal Tow Path, which suffered extensive damage and required closure for repairs. Several other parks and recreation sites were also damaged, including the Schuylkill River Trail, Pennypack Park Trail, and Wissahickon Valley Park.

Efforts were made to address the aftermath of the storm, including the removal of debris along riverbanks. Debris included logs, vehicles, and construction equipment. Plans were also put in place to restore heavily damaged streambanks. Special projects were undertaken to address specific issues caused by the storm, such as replacing a safety cable, repairing an outdoor amphitheater at Dell Music Center, and addressing flood damage at various playgrounds. Additionally, crews worked to clear and recycle dozens of downed trees.

Figure 3: Ida-Impacted Trails and Parks Infrastructure



Single-Family Homes, Small Buildings, and Affordable Housing

Hurricane Ida had a significant impact on small residential homes and buildings, particularly rowhomes or attached one-unit structures. These properties were severely affected throughout the city, with a concentration of damage in specific zip codes. Many of these areas are lower-income communities with a high percentage of at-risk populations. Targeted outreach efforts conducted by Pennsylvania and Southeastern Pennsylvania Voluntary Organizations Active in Disaster (PAVOAD) have identified substantial unmet needs among homeowners and renters in these areas, primarily residing in single-family homes located in dense settings like Strawberry Mansion (zip code 19132).

According to Federal Emergency Management Agency (FEMA) data, Strawberry Mansion had the highest number of Individual Assistance registrations and the highest concentration of repair and rental assistance awarded in the aftermath of Hurricane Ida. Damage assessments conducted by PAVOAD indicate that these homes continue to experience a combination of compromised exterior envelopes, including roofs, exterior walls (mostly masonry), windows, and doors, as well as various interior needs. It is important to note that many of these homes are aging and deteriorating buildings with deferred maintenance needs, which were further exacerbated by Hurricane Ida. This situation likely applies to other homes impacted by the storm across the city, especially in zip codes with higher rates of FEMA Individual Assistance.

Preserving this crucial segment of affordable housing, particularly older row homes, is a top priority for the City, as it constitutes a significant portion of Philadelphia's housing stock, accounting for nearly 60% of all residential units. Additionally, these properties contribute significantly to the city's naturally occurring affordable housing stock.

Local Businesses

Hurricane Ida inflicted significant damage and disruption on businesses within the affected areas. The severity of the impact varied depending on the location, nature of the business, and the intensity of the storm. The following are some of the key effects experienced by businesses in Philadelphia:

- Physical damage: The heavy rainfall and flooding caused by Hurricane Ida resulted in substantial damage to buildings, infrastructure, and equipment. Many businesses faced structural damage, water intrusion, and power outages, leading to temporary or permanent closures.
- Supply chain disruptions: The storm disrupted transportation systems, including highways, railways, and ports, making it challenging for businesses to receive supplies and transport their products. This created delays and shortages across various industries, such as retail, manufacturing, and construction.
- Loss of income and unpaid wages: The closures and disruptions caused businesses to experience a loss of income during and after the storm. This had a particularly significant impact on small businesses that may have lacked sufficient financial reserves or insurance coverage. Additionally, reduced business hours resulted in financial hardships for employees, particularly those in low-wage or hourly positions.

The overall impact of Hurricane Ida on businesses necessitated substantial time and resources for recovery. Small businesses, in particular, faced significant challenges in rebuilding and resuming operations. Efforts to support affected businesses and foster their recovery remain crucial in restoring the local economy and ensuring the well-being of both business owners and employees.

Recovery and Resiliency Planning

The aftermath of Hurricane Ida revealed needs tied to the City's preparedness and response to extreme weather events. One of these needs is studying potential resiliency and mitigation efforts to minimize the impact of future hurricanes and storm events. Another area for improvement is planning better evacuation procedures for occupants of subgrade spaces in the event of flash floods. It is also important to identify the location of vulnerable structures, especially residential structures, and explore solutions to better protect them from floods, storms, and other natural hazards. In addition, there is a need to enhance methods for forecasting, monitoring, tracking, and evaluating the impacts of extreme weather events. Finally, residents and community members must evaluate methods for reducing carbon emissions and increasing resiliency to mitigate the effects of climate change. Addressing these areas of improvement can help the City and its partners better prepare for future extreme weather events and build a more resilient and sustainable future.

Figure 4: Manayunk after Ida



1.5 Summary

To fulfill the requirements of this allocation, the City must submit an Action Plan that identifies its unmet recovery and mitigation needs. This Action Plan outlines proposed uses of CDBG-DR funds and eligible activities available to assist impacted areas in meeting unmet housing, infrastructure, planning, and economic revitalization needs resulting from Hurricane Ida's impacts. Specifically, this plan aims to promote and ensure fair access to housing for low-to-moderate income residents and strengthen neighborhoods impacted by the disaster by investing in housing, infrastructure, public facilities, along with public services and planning. In addition, the Action Plan describes how CDBG-DR funds will be targeted toward and meet the needs of vulnerable communities, including those with low to moderate income, limited English proficiency, racially and ethnically concentrated communities, and individuals experiencing homelessness.

The City has been engaging communities and gathering data for the unmet needs assessment since 2021. To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, the City has initiated meetings with federal stakeholders, various state and local officials, residents, and non-profit organizations. These meetings have been beneficial in gathering information about the impacts of the storm, existing challenges to address, and solutions. In addition, the City continues to work with local entities and non-profit organizations to collect information.

The City will provide residents with reasonable notice and opportunity to comment on the Action Plan and its substantial amendments. The City will convene at least one public hearing on the draft CDBG-DR Action Plan after being posted on its disaster recovery website for public comment and before submission to HUD. Notice of all hearings will follow the guidelines established in the City's CDBG-DR Citizen Participation Plan. The City has published this draft CDBG-DR Action Plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan will remain available on the City's CDBG-DR website throughout the 30-day comment period.

The City’s Office of the Director of Finance (Finance) and Division of Housing and Community Development (DHCD) will jointly oversee administration of the CDBG-DR program. While Finance Office and DHCD will be the primary entities administering the grant, implementation will be a coordinated effort between numerous City agencies including but not limited to the Managing Director’s Office (MDO), Mayor’s Office, Philadelphia Water Department (PWD), Commerce Department, and Philadelphia Parks and Recreation (PPR). The City will continue citizen engagement efforts throughout the duration of this grant and will adjust as necessary.

1.6 Unmet Need and Proposed Allocation

The City used best available data sources to analyze the demographic characteristics of the areas of impact; the losses sustained; and the available resources in response to housing, infrastructure, and economic revitalization. The overall unmet need for the remnants of Hurricane Ida totals more than \$1.2 billion, with housing and infrastructure showing the greatest need at 61 percent and 38 percent respectively. These estimates still need to be completed. The City utilized publicly available FEMA Individual Assistance (FEMA IA) data, publicly available Small Business Administration data, internal FEMA Public Assistance (FEMA PA) data along local data sources.¹ The City awaits FEMA and Small Business Assistance (SBA) data sets from HUD to complete the unmet needs assessment. In addition, the City continues to work with local organizations to calculate a more accurate value of unmet infrastructure needs. CDBG-DR funds will be used to address unmet housing and infrastructure needs primarily. Housing and infrastructure investment will provide the most benefit and long-term recovery solutions to the impacted communities. CDBG-DR funding will be directed to the communities most impacted and with the greatest unmet needs. All CDBG-DR funded activities will be implemented in the HUD Most Impacted and Distressed (MID) areas.

Table 1-2: Unmet Needs

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount*	% of Program Allocation
Housing	\$810,140,419	61%	\$52,138,100	32%
Economic Revitalization	\$16,087,000	1%	\$5,000,000	3%
Infrastructure	\$474,553,000	38%	\$52,138,100	32%
Mitigation	Not applicable	Not applicable	\$21,287,000	13%
Public Services	Not applicable	Not applicable	\$3,000,000	2%
Administration	Not applicable	Not applicable	\$8,160,200	5%
Planning	Not applicable	Not applicable	\$21,480,600	13%
Total	\$1,300,780,419	100%	\$163,204,000	100%

¹ The City’s Action Plan uses publicly available data offered through FEMA’s OpenFEMA platform. The City also received data through HUD’s Data Sharing Agreement with FEMA on June 16, 2023. Based on a comparative analysis of data collected from FEMA’s publicly available datasets and the data provided through the FEMA-HUD Data Sharing Agreement, there is no substantial difference between the two datasets.

Table 1-3: Proposed Use of Funds

Category	Program	Budget	HUD Identified MID Budget (%)	Percent of Allocation (%)
Housing	Homeowner Rehabilitation	\$42,138,100	100%	26%
Housing	Rental Rehabilitation and Repair	\$10,000,000	100%	6%
Economic Revitalization	Small Business Grant Program	\$5,000,000	100%	3%
Infrastructure	Infrastructure Program	\$52,138,100	100%	32%
Mitigation	Mitigation Program	\$21,287,000	100%	13%
Public Services	Housing Counseling	\$1,000,000	100%	1%
Public Services	Workforce Training	\$2,000,000	100%	1%
Administration	Administration	\$8,160,200	100%	5%
Planning	Planning	\$21,480,600	100%	13%
Total		\$163,204,000	100%	100%

1.7 Homeowner Repair Program

Budget

\$42,138,100

Activity Description

The Homeowner Repair Program will assist homeowners whose low- to moderate-income or other social vulnerabilities impede their ability to access other sources of recovery assistance in order to fully repair their homes. The Homeowner Repair Program aims to assist homeowners repair their homes, support rehabilitation of older and existing housing stock, and provide safe and decent housing opportunities for residents that incorporate climate resilience solutions.

Eligibility

Property

- Not located in a floodplain. Properties located in the floodplain will be addressed in a separate program.
- Costs for rehabilitation are reasonable and consistent with market costs at the time and place of construction.
- Property taxes are current on an approved payment plan or have an exemption under current laws.
- Must be on current mortgage or be on a payment plan.

Applicant

- Applicant(s) must own the property.
- The property must be the owner’s primary residence at the time of the storm and at the time the award is distributed.
- Household income must be less than or equal to 80% AMI.

Awards

The maximum amount of assistance available to an applicant is \$150,000. Applicants may receive additional assistance provided the applicant has been unable to obtain other sources of assistance.

Loans will have a 10-year compliance period. Assistance will be provided in the form of a zero-interest secured forgivable loan. Homeowner(s) must agree to the forgivable loan compliance period and lien requirements, as applicable.

1.8 Rental Repair, Rehabilitation, and Construction Program

Budget

\$10,000,000

Activity Description

The program will assist eligible owners of rental properties to rehabilitate, repair, and construct rental housing to provide safe, clean, and affordable rental housing to LMI households. The program will restore or create additional affordable rental units for residents impacted by Ida. It also will work to improve rental housing conditions for residents most impacted by the storm.

Eligibility

Property

- Must **not** be located in a floodplain.
- Costs for rehabilitation and construction are reasonable and consistent with market costs at the time and place of construction.
- Property taxes are current, on an approved payment plan or have an exemption under current laws.

Applicant

Eligible applicants include any public, private, for-profit, or nonprofit entity that owns the subject property at the time of application.

- Priority may be given to the original owners who owned the property continuously from the time of the storm until the time of application for assistance.
- New owners include those entities who (1) purchased the property after the storm or have an option to purchase, or other suitable form of site control for an eligible

property that received a significant amount of damage during the storm; and (2) wish to exercise that option to rehabilitate the property.

Awards

The maximum award is \$150,000 per unit for any rehabilitation project. Program guidelines will stipulate a process for applications to identify situations where exceeding the maximum award amount may be necessary. For example, increased costs of compliance associated with accessibility concerns, environmental mitigation, and other extenuating circumstances may warrant exceeding the maximum award amount. Such requests will be reviewed by the City on a case-by-case basis.

1.9 Small Business Grant Program

Budget

\$5,000,000

Activity Description

The City will implement the Small Business Grant Program to provide working capital for businesses that can prove business impacts resulting from Hurricane Ida.

The program will achieve the following objectives:

1. Support recovery from Ida’s disaster impacts; and
2. Restore and improve the local economy through job creation and retention for low-to-moderate (LMI) income individuals.

Eligibility

Small businesses that meet the following criteria are encouraged to apply:

- Located within the City of Philadelphia;
- Have business impacts directly related to Hurricane Ida;
- Compliant with local, state, and federal regulations;
- Do not have outstanding taxes due to City.

Awards

The grant assistance for the Small Business Grant program will range from \$50,000-\$150,000 per applicant. As described in [II.D.3 of the 88 FR 3198](#) the public benefit standard from the Annual CDBG program, which sets limits on the amount of CDBG assistance, has been waived. Therefore, HUD has not established a dollar amount or award cap for economic development activities.

1.10 Infrastructure Program

Budget

\$52,138,100

Activity Description

This program will fund eligible projects within the identified HUD MID (Philadelphia) to address unmet recovery and resiliency needs associated with public infrastructure and critical facilities. The grant funds will allow the City to restore and construct critical infrastructure and facilities that will directly benefit residents impacted by Hurricane Ida and the larger community.

Eligibility

The program will be administered and implemented by the City of Philadelphia. The Infrastructure Program identifies infrastructure as including, but not limited to, the following types of projects: streets, water and sewer facilities, playgrounds, underground infrastructure, as well as flood and drainage measures. The program identifies critical facilities as buildings that serve a public safety purpose for local communities and reduce any damage and loss of life from future storm and disaster events.

Awards

The expected minimum program assistance available is \$500,000 and the expected maximum assistance is \$50 million. However, actual assistance will be determined based on the particular needs of and what is cost effective for each site. The City will also make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate persons with disabilities.

1.11 Mitigation Program

Budget

\$21,287,000

Activity Description

This program will fund hazard mitigation projects that aim to strengthen facilities, structures, and communities to make them less vulnerable to future disaster impacts. Eligible activities include the acquisition of flood-prone structures, localized drainage improvements, wind retrofit of structures, elevation of critical building components, and the development of plans and zoning efforts to decrease community exposure to severe weather events.

Eligibility

The program will be administered and implemented by the City of Philadelphia this program will focus on:

1. Recovering from Ida's disaster impacts;
2. Reducing or eliminating the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters;
3. Protecting publicly funded recovery investments in impacted communities;

4. Expanding awareness of resiliency and mitigation within the City and help build the capacity of project sponsors to prepare effective mitigation and resiliency projects; and
5. Promote a “green-first” approach by exploring opportunities to integrate best practices and strategies identified in the City’s Green City, Clean Waters and Office of Sustainability initiatives.

Awards

Maximum assistance will be identified at a later date. Updates will be made available through the City’s Action Plan amendment process.

1.12 Planning

Budget

\$21,480,600

Activity Description

The City will offer planning funds to City departments and offices. Planning funds will assist the City in determining community needs related to disaster impacts along with mitigation and resiliency needs. Addressing the recovery and mitigation needs of Philadelphia requires the continued fostering of a culture of preparedness and the provision of tools for proper planning. Planning studies in coordination with city agencies, state agencies, federal agencies, and regional entities, will help guide recovery solutions and better identify hazard risks, impacts, and subsequent mitigation measures.

Eligibility

Project approval and associated funding allocations will be made through evaluation of criteria related to the potential projects and funding availability. The City will assess each project based on the response to the following criteria. For projects to be eligible, the project must:

- Be an eligible activity under CDBG-DR,
- Have a proposed plan that address an unmet need and/or will mitigate risk, and
- Serve Philadelphia residents.

The City will carefully review potential projects and assess such factors as the following:

- Proposed plan is in alignment with meeting the CDBG-DR goal of helping mitigate future disaster risks;
- Degree to which the proposed plan will consider and mitigate risks to members of protected classes, HUD-defined vulnerable populations, and historically underserved communities; and
- Proposed project will include a path for adopting and implementing the plan.

Awards

The expected minimum program assistance available is \$50,000 and the expected maximum assistance is \$5 million. However, actual assistance will be determined based on the particular needs of and what is cost-effective for each project.

1.13 Public Services – Housing Counseling

Budget

\$1,000,000

Activity Description

The City will offer grants to subrecipients to deliver housing counseling support in conjunction with housing activities.

Eligibility

Subrecipient eligibility is limited to HUD-certified housing counseling agencies, nonprofit organizations, and community-based organizations.

Awards

The maximum amount allocated to subrecipients will be \$1,000,000 and detailed in the program guidelines.

1.14 Public Services – Workforce Training

Budget

\$2,000,000

Activity Description

The City will offer grants to subrecipients to deliver workforce training and development support in conjunction with implementing construction activities, particularly infrastructure projects.

Eligibility

Subrecipient eligibility is limited nonprofit organizations and community-based organizations.

Awards

The maximum amount allocated to subrecipients will be \$2,000,000 and detailed in the program guidelines.

1.15 Administration

Budget

\$8,160,200

Activity Description

The City will use administration funds for necessary general administration costs related to CDBG-DR grants, including but not limited to staff time administering programs, compliance, and monitoring of the City's subrecipients, vendors, and other recipients of funding; and other costs specified as eligible administrative expenses.

1.16 Public Comment Period

The City has published its full CDBG-DR Action Plan on [its website](#) and accepted public comments for a 30-day from Friday, July 14, 2023 to Tuesday, August 15, 2023. Citizens were notified through public announcements, City communications, and newspaper publications.

The City received comments via email and mail at:

Email-
CDBG-DR@phila.gov

Mail-
Attn: Sabrina Maynard
Office of the Director of Finance
City of Philadelphia
1401 John F Kennedy Blvd
Suite 1330
Philadelphia, PA 19102

Any updates or changes made to the Action Plan in response to public comments will be clearly identified in the Plan. Additionally, a summary of comments on the Plan or substantial amendment, and its corresponding response, will be uploaded in HUD's Disaster Recovery Grant Reporting system (DRGR) with the Action Plan.