



**Department of  
Development**

# **State of Ohio CDBG-Disaster Recovery Action Plan**

---

**Logan County**

Version: 2.0

Published: April 2026

Prepared By:

Ohio Department of Development

Community Services Division

Office of Housing Support

## Summary of Substantial Amendment (Version No. 2)

This Substantial Amendment reflects a focused set of updates to the State of Ohio's CDBG-DR Action Plan for the 2024 tornadoes (DR-4777-OH). The changes are grounded in the State's ongoing assessment of recovery conditions in Logan County and informed by continued coordination with local officials, housing partners, and infrastructure providers. The intent is to better align program design with current recovery conditions while maintaining full compliance with HUD requirements.

The amendment includes the following key changes:

- Refinement of Housing Programs: The State is introducing a Single-Family Rehabilitation and Reconstruction Program to address homes that sustained significant damage. This addition responds directly to gaps identified in the unmet needs assessment and through local stakeholder input. After additional outreach and communication with Logan County, it became clear that disaster survivors need their homes reconstructed (i.e., replacing housing within the same footprint). The amendment also establishes clear maximum assistance levels for rehabilitation and reconstruction activities, based on current construction cost estimates and program feasibility.
- Integration of Demolition Activities: Demolition and clearance are no longer treated as a standalone program. These activities are an eligible project cost for homes being rehabbed and reconstructed. This approach reflects how recovery is occurring on the ground, where demolition is often a necessary step toward rebuilding or rehabilitation. This change also aligns with 24 CFR 570.201, where demolition is most appropriately carried out as part of an eligible project cost rather than as a standalone program.
- Addition of a Planning Component: The amendment formalizes a Planning program and clarifies eligible uses of these funds. While planning activities were contemplated in the original framework, this update allows the grantee to award planning grants to subrecipients. Planning activities will support all eligible activities under 24 CFR 570.205, including but not limited to infrastructure studies, housing development analysis, capacity building, and other efforts that lead to implementation-ready projects, particularly those addressing utility access and site readiness.
- Revisions to Program Structure and Subheadings: Program subheadings and activity descriptions have been revised to align more closely with HUD Action Plan requirements. These updates improve clarity, consistency, and ease of review by ensuring that each program is organized using a structure that reflects HUD's expected format, including clearly defined eligible activities, national objectives, and program requirements.
- Administrative and Compliance Updates: The amendment provides additional detail on the method of distribution, confirms Logan County as the primary subrecipient, and strengthens the description of project selection, prioritization, and alignment with unmet needs.

Taken together, these changes do not alter the overall direction of the recovery effort but instead refine program delivery to better reflect current recovery conditions and improve implementation efficiency.

## Reallocation of Funding Through Substantial Amendment

While the total grant amount remains unchanged, funds have been redistributed across program categories to better align with updated priorities and the scale of unmet need. Housing continues to represent the primary focus of recovery, with infrastructure investments supporting redevelopment in impacted areas.

Activity	Previous Allocation (\$)	Previous %	Revised Allocation (\$)	Revised %	Change (\$)	Change (%)
Administration	\$705,800	5.0%	\$705,800	5.0%	\$0	0.0%
Planning	\$500,000	3.5%	\$500,000	3.5%	\$0	0.0%
Demolition and Clearance (Standalone)	\$300,000	2.1%	\$0	0.0%	-\$300,000	-2.1%
Single-Family New Construction	\$3,500,000	24.8%	\$3,000,000	21.3%	\$0	-3.5%
Single-Family Rehabilitation/Reconstruction	\$0	0.0%	\$800,000	5.7%	+\$800,000	+5.7%
Multifamily Rental Development	\$3,269,200	23.2%	\$3,269,200	23.2%	\$0	0.0%
Infrastructure	\$4,000,000	28.4%	\$4,000,000	28.4%	\$0	0.0%
Mitigation Set-Aside	\$1,841,000	13.0%	\$1,841,000	13.0%	\$0	0.0%
<b>Total</b>	<b>\$14,116,000</b>	<b>100%</b>	<b>\$14,116,000</b>	<b>100%</b>	<b>\$0</b>	<b>0.0%</b>

## **Citizen Participation**

This Substantial Amendment was developed in accordance with the State's Citizen Participation Plan and HUD requirements, including a public comment period of not less than 30 days and the opportunity for public input through a public hearing. A full description of the citizen participation process and a summary of comments received are provided in Part 5 of this document.

DRAFT

# Table of Contents

<b>Executive Summary</b> .....	<b>7</b>
<b>Proposed Program Budget</b> .....	<b>9</b>
<b>Part 1: Disaster Assessment and Response</b> .....	<b>10</b>
<b>1.1 Pre-Disaster Conditions</b> .....	<b>10</b>
Economy and Labor .....	10
Education .....	10
Housing.....	11
<b>1.2 Post-Disaster Conditions</b> .....	<b>11</b>
<b>1.3 Recovery Efforts</b> .....	<b>12</b>
Short-Term.....	13
Long-Term .....	13
<b>1.4 Most Impacted and Distressed Areas (MID)</b> .....	<b>14</b>
<b>1.5 Overview of Impacts and Allocation Summary</b> .....	<b>14</b>
<b>Part 2: Estimating Unmet Needs</b> .....	<b>14</b>
<b>Unmet Needs Assessment</b> .....	<b>14</b>
<b>Housing</b> .....	<b>15</b>
SBA Data Analysis for Owner-Occupied and Renter-Occupied Housing .....	15
FEMA IA Data Analysis for Owner-Occupied and Renter-Occupied Housing.....	15
Housing Unmet Needs Methodology-Owners .....	18
Housing Unmet Needs Methodology-Renters .....	20
Impacts on Public Housing (Including HUD-assisted Housing) and other Affordable Housing .....	21
Shelters, Interim and Permanent Housing.....	21
<b>Infrastructure</b> .....	<b>22</b>
<b>Economic Development</b> .....	<b>25</b>
<b>Mitigation Needs Assessment</b> .....	<b>25</b>
<b>Part 3. Connection of Proposed Programs and Projects to Unmet Needs</b> .....	<b>28</b>
<b>Preliminary Program Design</b> .....	<b>28</b>
Rationale for Selected Programs .....	28
Rationale for Excluded Activities .....	29
<b>Part 4. Allocation, Award Caps, and Funding Criteria</b> .....	<b>29</b>
<b>Allocation and Award Caps</b> .....	<b>30</b>
Award Caps .....	30

Compliance with HUD Requirements .....	32
<b>General Exception Criteria .....</b>	<b>32</b>
Exception Circumstances.....	32
Approval Process .....	33
Limitations .....	33
<b>Environmental Review and Compliance .....</b>	<b>34</b>
<b>Administration .....</b>	<b>34</b>
Administrative Cost Allocation.....	34
Financial Management and Internal Controls.....	34
Procurement.....	34
Monitoring and Oversight.....	35
Duplication of Benefits (DOB) .....	35
Training and Technical Assistance.....	35
Reporting.....	36
Citizen Engagement in Administration .....	36
<b>Planning.....</b>	<b>36</b>
<b>Housing .....</b>	<b>38</b>
<b>Table 14: Grantee Housing Programs Overview .....</b>	<b>38</b>
Housing Program Number One – Single-Family Replacement Housing .....	39
Housing Program Number Three – Multifamily Rental Development .....	46
<b>Infrastructure .....</b>	<b>51</b>
Infrastructure Programs Overview .....	51
<b>Part 5. General Information .....</b>	<b>56</b>
<b>Citizen Participation – Outreach Efforts .....</b>	<b>56</b>
Consultation in Developing the Action Plan .....	56
Public Comments .....	58
Public Hearings.....	59
Consideration of Public Comments.....	59
<b>Table 18 – Substantial Amendment No. 2 - Public Comments Response.....</b>	<b>61</b>
<b>Comment Received .....</b>	<b>61</b>
<b>Grantee’s Response .....</b>	<b>61</b>
Citizen Complaints.....	61
<b>Anti-Displacement .....</b>	<b>62</b>
<b>Waivers.....</b>	<b>63</b>
One-for-One Replacement Waiver .....	63
Duplication of Benefits (DOB) Flexibilities.....	64
Environmental Review Streamlining .....	64
Procurement Flexibilities.....	64
Pre-Award Cost Eligibility.....	64
Transparency and Public Notice.....	65

**Modifications to the Action Plan .....65**

**Performance Reports .....66**

## Executive Summary

On March 14, 2024, an EF-3 tornado carved an 0.8-mile-wide path through Logan County, Ohio, severely impacting the Villages of Lakeview and Russells Point and parts of Stokes and Washington Townships. Three of the four confirmed fatalities from the broader outbreak occurred in Lakeview; 27 individuals were injured.

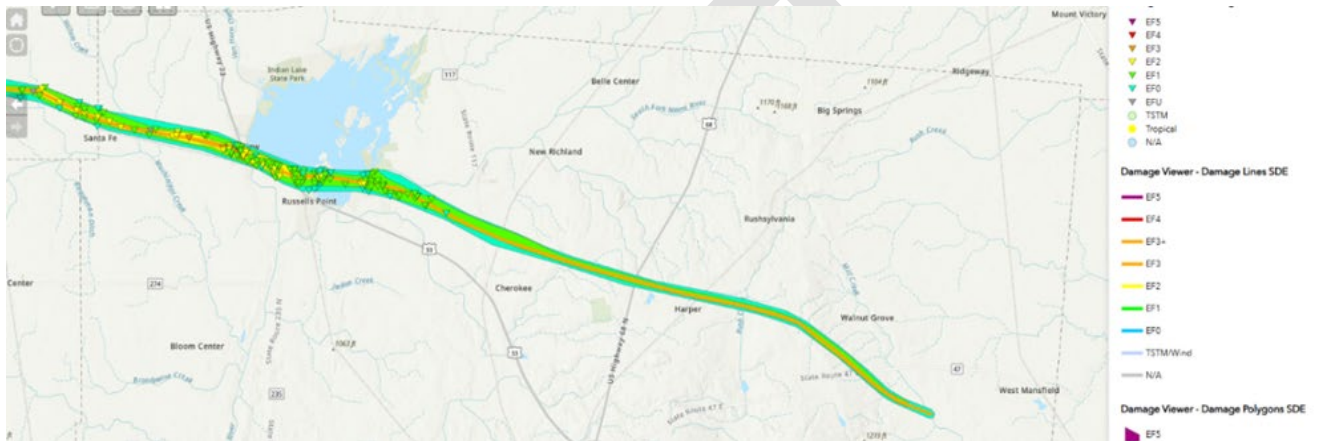


Figure 1: Path of 2024 Tornado

Local assessments identified damage to more than 1,500 parcels and businesses, including 235 homes that were destroyed, with 650 additional homes sustaining major or minor damage.



Figure 2: leveled Lakeview cottages photo from Sidney Daily News on March 15, 2024

Emergency response and damage assessments were conducted over the first 30 days, with Emergency Declarations issued by the County Commissioners and Ohio Governor on March 29, 2024. Following the Presidential Disaster Declaration (DR-4777-OH) on May 2, 2024, FEMA and SBA began to assist individuals, families, and small businesses. On January 16, 2025, the U.S. Department of Housing and Urban Development (HUD) announced that the State of Ohio will receive \$14,116,000 in funding to support long-term recovery efforts following Ohio Tornadoes DR-4777-OH through the Ohio Department of Development. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet need in the State of Ohio

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 facilitate a quicker recovery. HUD has allocated \$14,116,000 in CDBG-DR funds to the State of Ohio in response to the Ohio Tornadoes DR-4777-OH, through the publication of the Federal Register 90 FR 4760. This allocation was made available through the Extending Government Funding and Delivering Emergency Assistance Act (division B of Pub. L. 117-43).

DRAFT

## Proposed Program Budget

Table 1 below summarizes the State’s proposed allocation of its \$14,116,000 CDBG-DR grant in response to DR-4777-OH. These allocations reflect preliminary unmet needs in housing, infrastructure, planning, and mitigation, and align with statutory and regulatory requirements.

**Table 1 – Program Budget**

Eligible Cost Category	Allocation Amount	% of Total	Estimated % to CDBG-DR Mitigation Set-Aside	Estimated % to HUD MID Areas	Estimated % to LMI
<b>Administration</b>	\$705,800	5.0%	—	—	—
<b>Planning</b>	\$500,000	3.5%	0%	—	—
<b>Housing</b>	\$7,069,200	50.1%	60% of program integrates resilience	100%	≥70%
<b>Infrastructure</b>	\$4,000,000	28.3%	40% integrates MIT features	100%	≥70%
<b>Mitigation Set-Aside</b>	\$1,841,000	13.0%*	100%	100%	≥70%
<b>Total</b>	<b>\$14,116,000</b>	<b>100%</b>	<b>100%</b>	<b>95%+</b>	<b>≥70%</b>

\*While the specific mitigation cost category is 13% of the total allocation, the amount listed meets the mitigation set-aside requirements at 15% of the estimated unmet needs per the universal notice.

# Part 1: Disaster Assessment and Response

## 1.1 Pre-Disaster Conditions

Logan County spans 458 square miles and lies in northwest Ohio and ranks 53rd in population of the 88 counties in Ohio with a population of approximately 46,047. Bellefontaine is the largest city and serves as the county seat. It is also home to Indian Lake which is a regional recreation hub. According to the 2023 ACS, the median age is 42; and the racial composition is 92% White, 3% multiracial, 2% Black, 1% Asian, 2% other. From 2010–2020, population rose modestly; with housing units increasing approximately 2%. Vacancies, however, fell 2%, tightening the housing supply.



Figure 3: Logan County location

## Economy and Labor

Manufacturing accounts for roughly a quarter of jobs (26.3%), followed by healthcare/social assistance and retail. The median household income is \$69,183 with a per capita income of \$37,613 (ACS 2023). According to the Ohio Department of Job & Family Services, the average wage (job-based) in 2023 was \$1,004.88/week or \$52,254/year.<sup>1</sup> Prior to the disaster (2023), the unemployment rate was 3.2%, followed by 4% in 2024.<sup>2</sup> In July 2025, the unemployment rate was 5% with a civil labor force of 23,312 people in the same month.<sup>3</sup>

## Education

Logan County is home to 12 schools/districts and one career center.<sup>4</sup> The Ohio Schools Report Card (2023-24)<sup>5</sup> notes that the graduation rates of the four main public-school districts are all over 90% as follows:

- Bellefontaine City Schools – >95%
- Benjamin Logan Local Schools – 93.7%
- Indian lake Local Schools -- >95%

<sup>1</sup> [https://ohiolmi.com/docs/QCEW/trends\\_n/2023\\_AWE\\_Trends.pdf](https://ohiolmi.com/docs/QCEW/trends_n/2023_AWE_Trends.pdf)

<sup>2</sup> <https://ohiolmi.com/docs/LAUS/AnnualAverages/2024CLFE.pdf>

<sup>3</sup> <https://fred.stlouisfed.org/release/tables?rid=116&eid=255604#snid=255650>

<sup>4</sup> <https://www.logancountyohio.gov/schools.html>

<sup>5</sup> <https://reportcard.education.ohio.gov/download>

- Riverside Local Schools – 93.6%

Ninety-two percent (92.9%) of Logan County residents age 25+ have a high school diploma or higher, while 18.3% hold a bachelor’s degree or higher.<sup>6</sup>

The Ohio Hi-Point Career Center serves as the county’s regional career technical hub, providing CTE pathways and industry credentials for high school students from area districts. Clark State College also operates a Bellefontaine location at the Center, giving students access to College Credit Plus (dual enrollment) opportunities.

## Housing

Logan County had approximately 23,797 housing units before the March 2024 tornadoes, with a 78% owner-occupancy rate, which is above national average.<sup>7</sup> The median property value was \$186,200. Eighty-two percent (82%) of the housing units were occupied; however, Indian Lake area contains a notable share of second/seasonal homes that are not occupied year-round. Median gross rents (ACS 2023) was \$832/month.

## 1.2 Post-Disaster Conditions

Following the March 14, 2024 tornadoes, the Logan County Community Recovery Committee (CRC) convened on April 15, 2024 at the request of the County Emergency Management Agency, which conducted a structured, countywide assessment of impacts and recovery needs. Working through subcommittees on Housing, Infrastructure, Business & Economic Recovery, Communications, Transportation, Long-Term Recovery, and related concerns, the CRC gathered input at two public open houses attended by over 140 people on May 2 and June 20, 2024, reviewed local damage assessments, and coordinated with municipalities, utilities, nonprofits, and residents.

The Committee organized findings into short-term ( $\leq 18$  months) and long-term ( $> 18$  months) priorities, identified responsible entities, and documented key barriers, most notably widespread housing loss (including in the Indian Lake area), critical utility service gaps, and business disruption.

As of April 2025, local survey counts identified 83 businesses: 22 destroyed, 24 major damage, 12 minor damage, 8 affected, 17 not affected. SBA disaster lending data will refine quantified economic losses and remaining unmet need once received.

---

<sup>6</sup> [https://data.census.gov/table/ACSST5Y2023.S1501?g=060XX00US3909166740&utm\\_source](https://data.census.gov/table/ACSST5Y2023.S1501?g=060XX00US3909166740&utm_source)

<sup>7</sup> <https://censusreporter.org/profiles/05000US39091-logan-county-oh/>



Figure 4: Downed power line

Downed trees and power lines caused widespread outages; localized flooding in Richland and Stokes Townships closed roadways. Utilities require hardening (e.g., backup power for lift stations, undergrounding where feasible) and extensions to serve rebuilding neighborhoods.

Initial State request (March 2024) estimated 1,138 residential impacts (174 destroyed; 175 major; 536 minor; 253 affected). By April 2025, refined County counts identify 1,184 impacted residences (235 destroyed; 253 major; 417 minor; 279 affected), including approximately 352 non-primary residences typical of a seasonal market. Of those impacted, 56% of property owners were insured. Vulnerable groups include seniors (17%), children (24%), and people with disabilities (13%) among impacted households.

### 1.3 Recovery Efforts

Logan County and the State of Ohio issued emergency declarations on March 29, 2024. FEMA approved Individual Assistance for DR-4777-OH on May 2, 2024, enabling FEMA and SBA support to households and small businesses.



Figure 5: Logan County Indian Lake damage

The Logan County Community Recovery Committee (CRC) convened April 15, 2024 at the request of the Logan County EMA director. The CRC immediately established subcommittees for Housing, Infrastructure, Business & Economic Recovery, Communications, Long-Term Recovery, Transportation, and Miscellaneous. Public input was captured at open houses on May 2 and June 20, 2024; ideas were organized into short-term ( $\leq 18$  months) and long-term ( $> 18$  months) projects.

The CRC hosted two public meetings on May 2, 2024 and June 20, 2024 respectively. Input was cataloged, grouped by theme, and provided to the relevant subcommittee for feasibility screening and prioritization. These committees proposed priorities and developed relevant short and long-term priorities.

### Short-Term

The CRC reactivated its established intake and case management model that includes outreach, verification, and referrals, coordinating with the Ohio Voluntary Organizations Active in Disasters (VOAD), local vendors, and faith-based providers. As of April 2025, 97 individuals received referrals, 75 cases have been closed, 14 cases are in process, and 8 are experiencing barriers to progress.

Early implementation items include debris/dangerous structure demolition scoping (37 unsafe structures noted) and utility service checks.

### Long-Term

After initial outreach and the release of the Universal Notice, the Ohio Department of Development attended a CRC meeting on April 22, 2025 to meet the CRC and listen to proposed project priorities for disaster recovery funding. These were outstanding needs from their recovery priorities that

served as barriers for long-term community recovery. Three committees presented: Demolition, Infrastructure, and Housing. Each committee presented outstanding issues related to community recovery. The demolition committee addressed homes destroyed by the tornado that are not repairable and need demolished, but lack funding to do so. The infrastructure committee identified major outstanding concerns for updated water and sewer access to damaged structures as well as new water and sewer connections for new affordable housing if developed. The housing committee proposed a split between single-family housing to replace demolished structures and multi-family housing to address the affordable housing crisis facing the community.

## 1.4 Most Impacted and Distressed Areas (MID)

Logan County is the HUD-identified MID for DR-4777-OH. Highest concentrations of damage and LMI households are in Lakeview, Russells Point, and adjacent Stokes and Washington Townships. This Plan prioritizes replacement housing and enabling infrastructure needed in these geographies to support updated housing development.

## 1.5 Overview of Impacts and Allocation Summary

Disaster Summary	Detail
Qualifying Disaster	Ohio Tornadoes DR-4777-OH
HUD-identified MID Areas	Logan County (100% of funds expended in MID)
CDBG-DR Allocation	\$12,275,000
CDBG-DR Mitigation Set-Aside	\$1,841,000
Total Allocation	\$14,116,000

# Part 2: Estimating Unmet Needs

## Unmet Needs Assessment

This Unmet Needs Assessment (UNA) provides a comprehensive evaluation of Ohio’s post-disaster recovery landscape across three core areas: housing, infrastructure, and the economy. The assessment identifies not only the direct impacts of the 2024 tornadoes in the HUD Most Impacted and Distressed Areas (FEMA-4777-DR), but also how these events have magnified long-standing pre-disaster conditions—such as housing affordability gaps, aging infrastructure, and regional economic vulnerabilities. The housing analysis addresses the full continuum of need, including emergency shelter capacity, interim and permanent housing, and the condition and accessibility of rental, owner-occupied, and subsidized housing stock. Special attention is given to affordable housing for vulnerable populations, including individuals experiencing homelessness prior to the disaster. Together, these sections offer a data-driven foundation for targeted recovery investments and policy strategies.

**Table 2: Unmet Needs Assessment Summary**

<b>Sector</b>	<b>Disaster Impact</b>	<b>Assistance</b>	<b>Unmet Need</b>	<b>% of Unmet Needs</b>
Housing	\$23,233,595	\$1,517,971	\$21,715,624	55%
Infrastructure	\$17,972,396	\$0	\$17,972,396	45%
Economic Dev.*	Unavailable	Unavailable	Unavailable	0%
<b>Total</b>	<b>\$41,205,991</b>	<b>\$1,517,971</b>	<b>\$39,688,020</b>	<b>100%</b>

\*Federal SBA data was not made available as of September 19, 2025.

## Housing

HUD defines "unmet housing needs" by multiplying the number of affected housing units by the estimated repair cost and subtracting any repair funds already provided. While FEMA IA data is useful for assessing damage extent across the MID and provides valuable information on impacted housing characteristics, its accuracy on impact cost is limited due to FEMA's assessment methods and challenges in accessing data after major disasters. Given these limitations, HUD allows the use of empirically justified calculations to estimate full home repair costs and arrive at a more accurate value for housing unmet needs.

The following unmet housing need assessment utilizes FEMA IA data, as well as SBA Disaster Home Loan data, local housing market data, and other public data to understand key characteristics of damaged housing and households impacted by the disasters. It then estimates the cost of these impacts using HUD methodology and guidance to inform what activities are needed to meet the housing needs caused by the disasters after considering other types of recovery assistance.

### SBA Data Analysis for Owner-Occupied and Renter-Occupied Housing

A signed memoranda of understanding (MOU) was provided by Development to the Small Business Administration (SBA) to request data regarding SBA Disaster Declaration #20313. As of April 20, 2025, Development has not received a final signed MOU or specific data from the SBA.

### FEMA IA Data Analysis for Owner-Occupied and Renter-Occupied Housing

This housing needs assessment first looks at FEMA IA data for applicants to understand the types of housing impacted across the MID for both owners and renters. As Table 3 indicates below, the great majority of homes for owner-occupant applicants were either traditional single family or duplex structures at 68 percent, or mobile homes (MHUs) at 25 percent. For renter-occupied housing, a slightly larger proportion of households reside in MHUs at 29 percent while 56 percent reside in traditional single-family or duplex stick-built housing. A smaller number of renter-occupied units in the MID are multifamily apartments, making up 6 percent of housing units among FEMA IA renter-applicants in Logan County.

*Table 3: Owner- and Renter-Occupied Housing Types of FEMA IA Applicants*

Housing Type	Total Applicants	Owner Occupied	Tenant Occupied	Unknown Occupancy
Apartment	9	0	9	0
Boat	1	1	0	0
Condo	5	4	1	0
House/Duplex	446	356	86	4
Mobile Home	176	131	44	1
Other	36	23	12	1
Townhouse	3	2	1	0
Travel Trailer	7	6	1	0
<b>TOTAL</b>	<b>683</b>	<b>523</b>	<b>154</b>	<b>6</b>

Continuing the needs assessment using FEMA IA applicant data, this assessment considers the extent of inspections and damage recorded by FEMA based on their FEMA Verified Loss (FVL), and how many of these applicants ultimately received IA assistance, summarized in Table 4, below. There is a large amount of attrition from total applicants to inspections, then to those with recorded damage and finally those that received IA assistance, indicating the presence of unmet housing needs. Among owners, only 52 percent of FEMA IA applicants received an inspection, 80 percent of those inspected had recorded damage, and 53 percent of those with recorded damage received IA assistance.

For renters, 78 percent of applicants received an inspection, 71 percent of inspected households had damage confirmed by FEMA, and only 53 percent of those with damage received IA assistance. These results for owners and renters together help demonstrate the level of unmet housing needs remaining in the MID area of Ohio.

*Table 4: FEMA IA Assessment Summary for Owner and Renter Households*

FEMA Verified Loss and Individual Assistance	Owners	Renters
Total Applicants	523	154
Total Inspections	274	120
Inspections with Damage	219	85
Received IA Assistance	115	45
Total FEMA Verified Loss	\$6,239,184	\$354,476
Average FEMA Verified Loss	\$28,489	\$4,664

Among owner applicants, a total of 219 homes fall into one of the damage level categories established by HUD for CDBG-DR, based on FEMA IA data based on real property damage

assessed by FEMA. Of these damaged homes, 49 (22%) were at a Major High or Severe level, and the remaining 170 (78%) were at a Minor Low, Minor High, or Major Low level.

For renters, FEMA assesses personal property damage given renters’ lack of ownership of their housing, and ineligibility for assistance related to real property damage. Using personal property damage recorded by FEMA, HUD then uses this data to make assumptions on unmet needs for renters based on the nature of the storm event. Based on the HUD methodology for renter damage, roughly half of inspected renter households were determined by FEMA to have recorded damaged. Of all inspected households, 29 percent of renters experienced Major High to Severe damage, and 21 percent experienced a lower level of damage. These damage categories by county and MID areas are summarized below in Table 5.

*Table 5: HUD Damage Levels for Owner- and Renter-Occupied Homes*

HUD Damage Level	Owner	Renter
Minor Low	38	13
Minor High	45	13
Major Low	87	6
Major High	11	26
Severe	38	18
No Damage	304	78
<b>Total</b>	<b>523</b>	<b>154</b>

Table 6 below breaks down the HUD damage levels of the 219 home inspections completed where damage was identified, by types of housing impacted by the tornado event for owner-occupied housing. This data indicates that the impacted owner-occupied housing was almost entirely made up of traditional stick built single-family housing structures and manufactured housing units. This data informs the nature of housing repair and replacement housing activities needed to assist impacted homeowners with their recovery.

*Table 6: HUD Damage Levels for Owner-Occupied Housing by Housing Type*

HUD Damage Level for Owners by Housing Type	Major-High to Severe Damage	Minor-Low to Major-Low Damage
Apartment	0	0
Assisted Living Facility	0	0
Boat	0	0
College Dorm	0	0
Condo	0	0

Correctional Facility	0	0
House Duplex	20	100
Military Housing	0	0
Mobile Home	28	70
Other	0	0
Townhouse	0	0
Travel Trailer	1	0
<b>Total</b>	<b>49</b>	<b>170</b>

## Housing Unmet Needs Methodology-Owners

The State of Ohio has developed an alternative methodology to more accurately estimate disaster impacts, assistance received, and unmet needs for single-family housing. Historically, FEMA Individual Assistance (IA) damage inspections and award calculations have underestimated actual damage because damage level and cost are based on a relatively high-level inspection that may not consider the full extent of structural damage and feasibility of repairing a damaged home versus rebuilding it. FEMA IA awards are based on the cost to bring homes to a minimum habitable standard rather than full restoration.

Relying solely on FEMA loss determinations significantly underrepresents the true impact on disaster-affected households and the level of assistance needed to fully recover to a pre-disaster condition. To improve accuracy, the State categorized disaster-damaged single-family and manufactured homes — identified through FEMA IA damage assessments — into three groups: Reconstruction, Rehabilitation, and Replacement

- Homes classified by FEMA as Severe or Major-High damage were assumed to require:
  - Reconstruction for a permanent single-family home structure, or
  - Replacement for a manufactured home unit (MHU).
- Homes classified by FEMA as Major-Low to Minor-Low damage were assumed to require rehabilitation.

To estimate reconstruction costs for Severe and Major-High damage units, the State analyzed local housing construction market data, estimating an average single family home reconstruction cost of \$283,000. This figure is based on:

- The median construction cost per square foot for a 1,500sqft home in Ohio of \$217,500<sup>8</sup>
- An additional 30% is added to this average verified loss amount to account for inflation, supply chain variables, market volatility, and activity delivery costs. The result was rounded to the nearest thousand.

<sup>8</sup> <https://www.ohiorealestatesource.com/blog/building-home-in-ohio/>

For manufactured homes, the State used local Ohio market data to determine MHU replacement costs, estimating an average replacement cost of \$127,000 per unit. This figure is based on:

- An average price of an MHU in Ohio of \$65 per square foot<sup>9</sup>
- A housing unit size of 1,500 square feet
- An additional 30% to account for ancillary costs associated with MHU replacement, including demolition of the storm damaged unit, site preparation, haul and installation of the new unit, and activity delivery costs, rounded to the nearest thousand.

To estimate rehabilitation costs for Major-Low to Minor-Low units damage, the State analyzed comparable Small Business Administration Verified Losses for Tennessee’s disaster home loan program, estimating an average single-family home rehabilitation cost of \$52,000. This figure is based on:

- SBA disaster home loan data indicates moderately damaged single-family homes in Tennessee averaged approximately \$39,900 in verified losses. In the absence of SBA data specific to Ohio, the State relied on verified loss data from Tennessee as a reasonable proxy. Tennessee was selected because it shares many characteristics with the impacted areas of Ohio, had thorough data, is located within the same broader region of the country, similar housing stock and construction types, and comparable mixes of rural and small-town communities. These similarities support the use of Tennessee data as a reliable benchmark for estimating rehabilitation costs in Ohio.
- An additional 30% is added to this average verified loss amount to account for inflation, supply chain variables, market volatility, and activity delivery costs. The result was rounded to the nearest thousand.

Using this alternative methodology, the State of Ohio has estimated just over \$18 million in total disaster damage impacts for owners. Removing the available assistance received by owner households from FEMA IA, charitable sources, and insurance leaves an estimate of approximately \$17 million in remaining single-family homeowner unmet needs.

*Table 7: Owner-Occupied Housing Unmet Needs Assessment*

Damage Level	# Owners	Expected Activity	Estimated Cost per Unit	
Minor-Low to Major-Low	170	Repair	\$52,000	\$8,840,000
Major -High to Severe	20	Reconstruction	\$283,000	\$5,660,000
Mobile Home (MHU)	29	Replacement	\$127,000	\$3,683,000
			<b>TOTAL NEED</b>	\$18,183,000
			<b>Available</b>	SBA Loans
				TBD

<sup>9</sup> <https://www.manufacturedhomes.com/state/ohio/>

<b>Assistance</b>	IHP repair/replace	\$812,809
	Charitable	\$368,945
	Insurance	TBD
	<b>Owner Unmet Need</b>	<b>\$17,001,246</b>

## Housing Unmet Needs Methodology-Renters

Determining the unmet housing needs of renters differs given that they do not own their homes and therefore do not have real estate damage costs associated with their household to base need upon. FEMA instead collects information on the amount of personal property loss, as well as a determination of the level of damage incurred by their rental housing unit.

The State of Ohio has adopted a methodology utilizing FEMA IA data and HUD guidance provided in the Federal Register for this CDBG-DR allocation. Given the known underestimation of impact costs related to renters as captured in FEMA RI-IHP data, HUD provided a table of multiplier values in 90 FR 4765 (shown for tornado disaster type in Table 8, below) to generate a better estimate of renter housing needs based on the type of disaster and the level of damage assigned to the personal property of renters. The State has adopted this methodology provided by HUD for determining renter unmet needs in the MID areas.

*Table 8 - HUD Multiplier Values for Estimating Unmet Needs for Renters, from 90 FR 4765*

Multiplier Type	Major-Low	Major-High	Severe
Renter Units (Tornado)	\$52,961	\$82,582	\$134,503
MHUs	\$77,058	\$98,463	\$134,834

The unmet need calculation for renters uses the damage categories from Table 8 and the HUD multipliers for tornado damage, as well as those for mobile homes to establish an estimate of total need from which known available assistance in Table 8 is subtracted to arrive at the total unmet housing need for renters totaling approximately \$4.7 million, summarized in Table 9 below.

*Table 9: Renter-Occupied Housing Unmet Needs Assessment*

Damage Category (HUD)	Disaster Type	# Renters	# MHU Renters	HUD Multiplier (all MHU)	# Renters non-MHU	HUD Multiplier (non-MHU)	Total Renter Need
Major-low	Tornado	6	2	\$77,058	4	\$52,961	\$360,014

Major-high	Tornado	26	8	\$98,463	18	\$82,582	\$2,267,786
Severe	Tornado	18	5	\$134,834	13	\$134,503	\$2,422,795
						<b>TOTAL NEED</b>	\$5,050,595
						<b>Available Assistance</b>	Approved FEMA IHP
							\$336,217
						<b>Renter Unmet Need</b>	<b>\$4,714,378</b>

## Impacts on Public Housing (Including HUD-assisted Housing) and other Affordable Housing

Consultations with the Ohio Housing Finance Agency (OHFA) and the Logan County Metropolitan Housing Authority (MHA) did not identify direct physical damage to OHFA-financed or MHA-partnered properties in Logan County during the March 2024 tornadoes. While the assisted inventory itself did not sustain reported structural loss, program operations and tenant stability were affected by broader market disruptions and displacement pressures.

A substantial share of the county’s lower-cost stock, particularly manufactured housing, was damaged or lost. Indian Village, a mobile home community at Indian Lake, experienced severe destruction, removing an important source of naturally occurring affordable housing for very low- and low-income renters and owners. FEMA Individual Assistance data indicate concentrated renter impacts consistent with affordable stock loss: among inspected renter households, 26 experienced major-high damage and 18 experienced severe damage, with an estimated renter unmet need of approximately \$4.7 million after accounting for available assistance. Owner-occupied manufactured homes also show significant damage: 28 units were categorized as major-high to severe and 70 as minor-low to major-low. These losses reduce the supply of lower-cost units, increase pressure on the remaining rental market, and produce high vulnerability for low-income renters if future disasters occur.

## Shelters, Interim and Permanent Housing

Logan County participates in a six-county Continuum of Care (CoC) region. Two local homeless shelters operate in the county, and the Midwest regional CoC maintains coordinated entry, HMIS data collection, and referral pathways for emergency shelter, rapid re-housing (RRH), and permanent supportive housing (PSH).

Following the March 14, 2024, tornadoes, Development contacted the CoC lead and local providers to assess shelter demand and facility status. The CoC reported no disaster-related damage to shelter facilities in Logan County and no surge that exceeded available capacity. No unmet needs were identified in Logan County’s two shelters that were attributable to the event. Individuals displaced by the storm in surrounding counties were absorbed by existing shelter resources within the region.

Households displaced by home damage were primarily served through non-shelter pathways (family/friends, short-term rentals, and insurance/FEMA-supported arrangements where

applicable). The CoC did not identify a need to open temporary congregate sheltering or add hotel/motel capacity for disaster reasons within Logan County. Coordinated entry continued to route households with pre-existing homelessness to emergency shelter, RRH, or diversion per standard practice.

## Infrastructure

The 2024 tornadoes impacted public infrastructure and facilities across the communities of Logan County which affected access to power, water, wastewater, and emergency shelter.

The Infrastructure Subcommittee of the Community Recovery Committee held an open house to gather public input on disaster recovery needs in Logan County. These public comments noted impacts from the tornadoes on infrastructure, primarily to electric service, water, and wastewater infrastructure. Commenters noted electric utility poles and wires still in need of repair. Additionally, comments noted the need for community storm shelters available to the public, including campgrounds and mobile home parks that are at higher risk of tornado impacts.

Some communities in the County experienced power loss during the tornadoes. These same communities also expressed a desire to upgrade and expand public water systems to provide reliable water service to communities currently served by private wells. Impacts to these water systems and others across the County from the tornadoes will be identified and considered.

The Logan County Sewer District indicated a need for pumps with resilient, backup power sources to keep the wastewater system up and running during tornadoes and other events and ensure a safe source of water for the community.

A damage assessment was conducted by the County after the storm to inform public assistance needs to request from FEMA. The County did not receive any PA program funding from FEMA, so the damage costs below, divided by FEMA project category, remain as unmet needs for public infrastructure related to the 2024 tornadoes. Category A and B activities were not included as they are not eligible for CDBG-DR assistance. There were no Category D damages noted.

*Table 10: Public Assistance Damage Assessment for Logan County*

Jurisdiction	Category C	Category E	Category F	Category G	Total
Logan County Sheriff	\$0	\$0	\$0	\$0	\$0
Washington Township	\$19,587	\$0	\$0	\$0	\$19,587
Logan County Auditor	\$0	\$0	\$0	\$0	\$0
Village of Russells Point	\$6,357	\$0	\$6,229	\$0	\$12,586
Logan County Electric Cooperative	\$0	\$0	\$56,000	\$0	\$56,000
Logan County Engineer	\$0	\$0	\$0	\$0	\$0
Stokes Township	\$144,000	\$500	\$0	\$0	\$144,500
Village of Lakeview	\$0	\$0	\$785,000	\$300,000	\$1,085,000

Logan County Solid Waste Dist.	\$0	\$5,276	\$0	\$0	\$5,276
Indian Joint Fire District	\$0	\$0	\$0	\$0	\$0
Logan Sewer District	\$0	\$0	\$697,723	\$0	\$697,723
Indian Lake Schools	\$0	\$1,000	\$0	\$0	\$1,000
Indian Lake EMS	\$0	\$500	\$0	\$0	\$500
Logan County Commissioners	\$0	\$0	\$4,907	\$0	\$4,907
Logan County Health	\$0	\$0	\$0	\$0	\$0
Logan County Library	\$0	\$0	\$0	\$0	\$0
<b>Totals</b>	<b>\$169,944</b>	<b>\$7,276</b>	<b>\$1,549,859</b>	<b>\$300,000</b>	<b>\$2,027,079</b>

Logan County also solicited other proposed projects from local jurisdictions in Logan County related to infrastructure needs across electric power, potable water, and wastewater services, listed below in Table 11. These projects intend to address impacts of the 2024 tornado event, and are considered in this unmet needs assessment for the purpose of estimating the cost of unmet infrastructure needs.

*Table 11: Logan County Local Jurisdictions Proposed Infrastructure Projects*

Project	Type	Estimate	Description	Relationship to Disaster
Bury 3 Phase Electric	Electric	\$30,000	Bury 3 Phase electric line	Buried electric line would serve Midway area which was highly impacted by the disaster. This would greatly increase reliability and resiliency to this area moving forward.
Pump Station Improvements	Wastewater	\$7,300,000	Improve 27 sanitary sewer pump stations to provide emergency standby pumping capabilities	Pumps would be able to operate during natural disasters, power outages, and equipment failures. Diesel pumps would keep pump stations operational during events especially on islands where access is limited. Associated remote monitoring capabilities would also help allocate labor and resources because need to physically check stations to ensure proper operation would be reduced/removed.

Emergency Connection	Water	\$807,925	Connect both village water systems with emergency connection. Connection would be located in Midway area which is between the two villages.	Provide uninterrupted potable water service in event one of the two villages water sources or treatment is compromised/ or unavailable for an extended time. Disaster occurred in general area of Lakeview's water plant; luckily, it did not cause huge damage.
Lakeview Water Plant Improvement	Water	TBD	Village starting to push 70% capacity. When pushing this percentage in Ohio, it is time to upgrade.	With properties being rebuilt and taking on more customers in the area where disaster struck, such as Midway, the Village will need to upgrade.
Lakeview Water Tower	Water	\$2,500,000	TBD	A water tower may be necessary to support expanding water service to Midway.
N Main Project	Water	\$1,364,692	Old water main needs replacing	Project located in another hard hit area of disaster. Village had to turn down funding grant due to finances after disaster. Several homes lost, storage facility, and lots of major damage occurred here. Upgrade important to rebuilding.
Midway Phase 3	Water	\$985,000	Install mains and hydrants in Midway	Public water unavailable in this area. Most wells are pin wells or shared. See letter from Health Department Commissioner. Water tower needed to help support this area.
Midway Phase 4	Water	\$1,090,700	Install service lines in Midway	Public water unavailable in this area. Most wells are pin wells or shared. See letter from Health Department Commissioner. Water tower needed to help support this area.

Village of Russells Point Water Towers	Water	\$1,867,000	Replace existing water tower(s)	Recovery efforts involve significant updates to destroyed or damaged structures to bring them up to current code. Replacing current water tower would meet the expanded water and sewer needs of the community brought on by updated housing that need access to water system that didn't exist before.
<b>TOTAL</b>		<b>\$15,945,317</b>		

Together, these two lists of proposed projects across Logan County inform the estimated unmet needs for infrastructure and the distribution of CDBG-DR funding allocated to Logan County across the proposed programs designed to address these unmet needs. There have been no other sources made available to the County or local jurisdictions for these projects. The total estimated infrastructure unmet need is below in Table 12.

Table 12: Total Estimated Infrastructure Unmet Needs

<b>Infrastructure Projects</b>	<b>Estimated Unmet Need</b>
Public Assistance Damage Assessment	\$2,027,079
Local Jurisdictions Proposed Infrastructure Projects	\$15,945,317
<b>Total Estimated Infrastructure Unmet Need</b>	<b>\$17,972,396</b>

### Economic Development

Development does not currently have SBA data available. A signed MOU was sent by Development and is awaiting signature and to receive data. However, when Development met with the long-term recovery committee more than a year after the disaster, remaining immediate business needs in relation to the disaster were not identified as a priority. The committee emphasized that they had already canvassed local businesses and found no significant structural or operational recovery needs, aside from limited interest in accessibility-related sidewalk improvements. Subsequent planning discussions and funding allocation meetings have not surfaced any concerns or requests for economic development activities, reinforcing the determination that no unmet business recovery needs remain.

### Mitigation Needs Assessment

As defined in the Universal Notice, mitigation activities increase resilience and reduce or eliminate 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. The following assessment on mitigation needs analyzes priorities identified by the state and county hazard mitigation plans and the Logan County Community Recovery Committee (CRC).

There are several risk hazards identified throughout the [2024 State of Ohio Hazard Mitigation Plan](#) and the 2023 Logan County Hazard Mitigation Plan. Logan County’s plan provided some insight into two of the major areas affected by the disaster – the villages of Russells Point and Lakeview. Of note, Russells Point is by far the poorest jurisdiction of those identified with a median household income at \$33,092 and a poverty level at 36.4%, which is more than double the next highest poverty level. The two highest hazard risks identified by the state mitigation plan are flooding and tornadoes. Since both of these hazards are also ranked as primary concerns in the Logan County plan and both were addressed by the CRC directly, they are two main hazards considered in this needs assessment.

According to the 2024 State of Ohio Hazard Mitigation Plan, Logan County had an annual probable rating of flooding at 227%, which is the second highest risk county in the identified 29-county region. Utilizing FEMA data, it further estimated an expected annual loss from flooding totaling

\$767,429. This is calculated and averaged based on damage assessed for that type of hazard. The Logan County hazard mitigation plan identifies flood concerns as generally low for the county as a whole, but specifically calls out flood plains for neighborhoods in proximity to Indian Lake. It further identifies that the mostly rural Logan County has limited residences in flood plains, but the Indian Lake-Lakeview-Russells Point area specifically is the primary concentration of residences living in flood plains. Homes are “close to the water, sit on low-lying parcels, and can be very close together on small plots of land,” further increasing the flood risks in that area that was heavily affected by DR-4777-OH. Of the ongoing actions taken to mitigate hazards as of 2023, this plan indicated delayed implementation of elevation for infrastructure and properties to reduce flood risks. Strategies for future mitigation activities included elevation of structures in flood plains. If elevation is not possible, acquisition, demolition, and relocation projects are the likely solutions presented.

With the disaster effected area having a particularly high flood risk, flood mitigation serves as a significant need when addressing potential future disasters.

Both hazard mitigation plans further identify tornado risk in the region that could bring more insight to DR-4777-OH specifically. The state plan incorporated metrics for expected annual loss due to

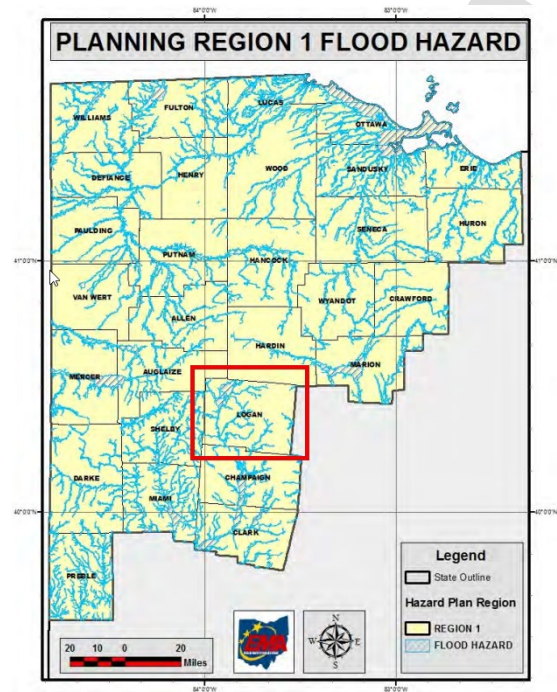


Figure 6: Flood hazard map from 2024 State of Ohio Hazard Mitigation Plan. Logan County is highlighted with a red box.

tornadic events at approximately \$1.8 million, with the majority of that loss concentrated in building damage based on assessed damage value from previous tornado events<sup>10</sup>. The Logan County plan identifies how tornadoes or severe thunderstorms in their county are not common and tend to be narrower, but can be devastating when they occur. It further mentions how the county's mobile home parks are concentrated around the perimeter of Indian Lake, which was an effected area of the disaster. Windstorm and tornado hazards are identified as the highest priority county-wide, immediately followed by severe thunderstorms and flooding. It is also indicated that "rental properties are generally less well maintained and more vulnerable to storm damage, as well as less likely to be repaired adequately after a severe storm," showcasing the disproportionate effect weather events can have on rental properties. Severe storm damage could also further increase flooding hazards.

Development will allocate 100 percent of the CDBG-DR mitigation set-aside to infrastructure and eligible housing activities that demonstrably reduce risk from the County's top hazards. Each

subrecipients will identify specific mitigation activities and associated budgets in its project proposal, which must demonstrate measurable reductions in vulnerability to flooding, high winds, or an additional priority hazard identified through the county's plan. Eligible mitigation expenditures include, but are not limited to, elevating structures and critical systems, installing storm-resistant roofing, improving drainage capacity, constructing safe rooms, and reinforcing utility corridors. Any mitigation activity must, at a minimum, address one or more of the goals and strategies identified in the Logan County hazard mitigation plan, which will be available on Development's CDBG-DR webpage [here](#). Strategies may be pulled from either the Logan County or the specific municipality's goals and strategies addressed in the hazard mitigation plan. Mitigation funding will be utilized to

support applicable mitigation measures as outlined under each program and will be prioritized based on the relative efficacy of the proposed mitigation strategy. Mitigation activities will be tracked as separate budget line items in the designated grants management system and DRGR to ensure compliance with HUD's 15 percent minimum requirement.

All approved mitigation activities should, at a minimum, adhere to Ohio Residential and Building Codes and all applicable local building codes and ordinances, supplemented by the following hazard-resistant standards:

- **Wind and Tornado Resistance:** Compliance with FEMA P-361, FEMA P-320 (Taking Shelter from the Storm), or equivalent standards for wind-resistant construction.
- **Flood Resistance:** Compliance with FEMA P-55 (Coastal Construction Manual), FEMA P-348 (Protecting Building Utilities from Flood Damage), and elevation at or above Base Flood Elevation + 2 feet for new and substantially improved structures.

Mitigation compliance will be verified through proposal reviews and documentation within each project file. Subrecipients may request an exception in writing to Development for the

---

<sup>10</sup> This metric excludes data from DR-4777-OH as it was published prior to the occurrence of that disaster.

supplemental mitigation standards requirements. These requirements are only waived upon written approval from Development to the subrecipient. Subrecipients will be required to submit final as-built documentation confirming installation of all mitigation features prior to final closeout.

## Part 3. Connection of Proposed Programs and Projects to Unmet Needs

HUD requires grantees to clearly demonstrate how proposed programs address the unmet housing, infrastructure, economic, and mitigation needs identified in the Action Plan's Unmet Needs Assessment. This section establishes the connection between Logan County's identified recovery gaps and the specific CDBG-DR programs proposed for funding.

### Preliminary Program Design

The March 2024 tornadoes caused widespread housing loss and infrastructure damage across Logan County, with disproportionate impacts in the Villages of Lakeview and Russells Point and surrounding Stokes and Washington Townships. The Unmet Needs Assessment identified two primary categories of significant, persistent need:

1. **Housing** – Hundreds of homes were destroyed or rendered uninhabitable. Affordable replacement housing options are limited. Both single-family and multifamily rental housing are critical to recovery and long-term neighborhood stabilization. In addition, unsafe and storm-damaged structures remain throughout impacted areas, requiring rehabilitation, demolition, and clearance to enable reconstruction, new construction, and safe re-occupancy.
2. **Infrastructure** – Recovery efforts are constrained by inadequate water and sewer access in the hardest-hit neighborhoods. Without utility extensions, new housing construction and neighborhood stabilization cannot occur.

### Rationale for Selected Programs

To address these needs, Development proposes a recovery portfolio focused on housing, infrastructure, and planning. Each proposed program is designed to directly address unmet disaster-related needs and support long-term recovery outcomes:

- **Housing Programs** will support the rehabilitation, reconstruction, and new construction of single-family and multifamily housing, with a focus on low- and moderate-income households. While total infrastructure damages exceed \$15 million, housing losses represent the most immediate barrier to long-term recovery, directly affecting displaced households and the County's ability to stabilize its most impacted neighborhoods. Prioritizing housing ensures that limited CDBG-DR resources deliver the greatest direct benefit to LMI residents and incorporates resilience to lessen the impact of future disasters on vulnerable members of the community.

- **Infrastructure Programs** will extend and improve utility systems that enable housing redevelopment, reduce the most significant cost barriers to redevelopment, and support the safe re-occupancy of impacted areas. Although the County has identified over \$15 million in infrastructure damages, far more than can be addressed with this allocation, the focused \$4 million investment is designed to prioritize projects that support housing recovery, align with the Ohio Hazard Mitigation Plan, and uphold resiliency standards where impacts to LMI communities are most acute.
- **Planning** will support the implementation of recovery programs and long-term resilience, as well as capacity building and technical assistance. Based on considerations from members of the CRC and the limited number of resources available to cover the wide housing and infrastructure needs gap, Development is opting to accommodate some planning costs as part of the preliminary program design. Planning funds may be used for planning activities such as infrastructure studies, housing development planning, technical assistance, and capacity building for local partners. Development also reserves the right to utilize planning funds for allowable expenses if it is determined necessary to better accommodate changing program needs.

#### Rationale for Excluded Activities

The following categories were considered but not included in the Action Plan, as available data and stakeholder input indicate that CDBG-DR funding is not necessary to address remaining needs in these areas:

- **Economic Development:** Estimated local and state recovery resources adequately cover remaining business losses. No significant unmet business recovery gap remains or has been identified by the community.
- **Public Services:** FEMA and state programs have provided extensive case management, counseling, and public health services. Available resources are sufficient to meet current needs, and no persistent service gaps were identified that would justify the creation of new CDBG-DR public service programs.

This focused program design ensures that CDBG-DR resources are used to address the core unmet needs of housing and infrastructure, while maximizing compliance with HUD's requirement that at least 70% of funds benefit low- and moderate-income households.

## Part 4. Allocation, Award Caps, and Funding Criteria

HUD requires grantees to describe how CDBG-DR funds will be allocated across eligible activities, the award caps established for each program, and the process for exceptions. This section provides Development's proposed allocation of funds to housing, demolition/clearance, infrastructure, administrative costs, and planning consistent with identified unmet needs and compliance requirements.

## Allocation and Award Caps

Table 13 below summarizes the proposed allocation of CDBG-DR funds by program.

**Table 13 – CBDG-DR Program Allocation**

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grante Identified MID	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration (5% cap)				\$705,800	5.0%
Planning (15% cap)			100%	\$500,000	3.5%
Rental Housing	\$4,714,378	11.9%	100%	\$3,269,200	23.2%
New Construction of Single Family Housing	\$17,001,246 <sup>11</sup>	42.8%	100%	\$3,000,000	21.3%
Owner-Occupied Rehabilitation and Reconstruction			100%	\$800,000	5.7%
Infrastructure	\$17,972,396	45.3%	100%	\$4,000,000	28.4%
Mitigation Set-aside			100%	\$1,841,000	13%
<b>Total</b>	<b>\$39,688,020</b>	<b>100%</b>	<b>100%</b>	<b>\$14,116,000</b>	<b>100%</b>

### Award Caps

Each program includes an award cap designed to prevent over-subsidization of individual projects and stretch funds across multiple households and neighborhoods. The following award caps are established:

- **Administration:** Limited to 5% of the total grant, per federal requirements.
- **Planning:** Funds may be used up to the full allocation of \$500,000
- **New Construction of Single-Family Housing:** Maximum award of \$150,000 per household, based on estimated construction cost of \$130,000 per household. Eligible project costs may include demolition and clearance activities where necessary to facilitate housing redevelopment. Demolition costs will be based on parcel-specific conditions and contracts and are estimated at an average of \$8,100 per unit, with a typical cap of \$9,500 per parcel, as applicable. Exceptions may be granted for accessibility modifications (e.g., ramps, widened doorways), other reasonable accommodation, or extraordinary construction costs (e.g., foundation work, floodplain elevation) in accordance with the General Exception Criteria. Projects should prioritize hazard mitigation features when applicable.
- **Single-Family Rehabilitation/Reconstruction:** Maximum award of \$52,000 per household for rehabilitation, based on estimated construction cost estimates of \$52,000 per household. Maximum award of \$140,000 per household for reconstruction, reflecting the higher costs associated with full replacement of a structure when rehabilitation is not feasible. Eligible project costs may include demolition and clearance activities where necessary to facilitate rehabilitation or reconstruction. Demolition costs will be based on parcel-specific conditions and contracts and are estimated at an average of \$8,100 per unit, with a typical cap of \$9,500 per parcel, as applicable. Exceptions may be considered for accessibility modifications or other reasonable accommodations. Projects should prioritize hazard mitigation features when applicable.
- **Multifamily Rental Development:** Funds may be utilized for a single project up to the maximum allocation of \$3,269,200. Projects must demonstrate efforts to exhaust other sources of multifamily rental housing development (i.e. LIHTC or other state and local resources) prior to submission of a project proposal. CDBG-DR funds may be used in addition to existing resources as long as it does not supplant existing funds or if its used to make a project viable. Projects should prioritize hazard mitigation features when applicable.
  - Maximum CDBG-DR contribution for multifamily projects will not exceed the applicable per-unit cost standards established by the Ohio Housing Finance Agency (OHFA)'s Low-Income Housing Tax Credit (LIHTC) 4 Percent Cost Containment Standards at the time of project submission to Development. Projects utilizing multiple funding sources must adhere to the lesser of the two per-unit cost limits (i.e., if a project has 9% LIHTC funding, which has a stricter per-unit cost limit than the limits provided here, the lower cost limit must be utilized). This maximum total cost per unit may be adjusted to the most recent cost containment standard upon the final approval of the project funding, but prior to construction beginning. As an example, under OHFA's 2025 4 Percent LIHTC Cost Containment Standards, the total direct cost per unit for projects in rural counties is capped at \$352,000 for new construction and \$272,000 for rehabilitation projects. These standards will govern the allowable per-unit cost framework for CDBG-DR-funded multifamily

development projects. Multifamily development projects not utilizing LIHTC financing are still subject to the same maximum applicable cost standard unless an exception is granted by Development. An alternative per-unit cost limit may be requested by a subrecipient to Development based on a localized market study or comparable data demonstrating prevailing construction costs for similar units in the region. All exception requests must follow the process outlined in the “General Exception Criteria” section.

- **Infrastructure:** Funds may be utilized for projects up to the maximum allocation of \$4,000,000 for a project. Projects will be prioritized based on LMI benefit, hazard mitigation features, and linkage to housing recovery.

All award cap thresholds exclude mitigation activities applied to the project from the mitigation set-aside. Subrecipients who identify mitigation activities in project proposals can use up to the full amount of funds available for mitigation activities or supplement with non-mitigation project funds if applicable.

#### Compliance with HUD Requirements

- **LMI Benefit:** At least 70% of funds will benefit LMI households through housing and infrastructure programs.
- **MID Requirement:** 100% of funds will be deployed within Logan County, which is a HUD-identified MID area.
- **Mitigation Set-Aside:** Housing or infrastructure projects will integrate hazard mitigation and resilience measures, satisfying the minimum 15% mitigation requirement.
- **National Objectives:** All programs meet one of HUD’s national objectives (LMI housing, LMI area benefit, or slum/blight elimination) as outlined below.

### General Exception Criteria

Development recognizes that while award caps and eligibility criteria are necessary to ensure equitable distribution of CDBG-DR resources, certain circumstances may require exceptions. Exceptions will be applied sparingly and only where consistent with HUD regulations, national objectives, and the approved Action Plan.

#### Exception Circumstances

Exceptions to standard program caps or requirements may be granted in the following situations:

##### 1. Accessibility Needs

- Where additional costs are required to provide reasonable accommodations or accessibility features for persons with disabilities, consistent with the Fair Housing Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act.

##### 2. Historic or Environmental Requirements

- Where additional costs are necessary to comply with historic preservation (36 CFR Part 800), environmental mitigation measures (24 CFR Part 58), or other federal/state regulatory requirements.
3. **Extraordinary Construction Costs**
    - Where site conditions (e.g., soil instability, floodplain mitigation, or tornado-resistant building standards) substantially increase construction costs beyond standard program caps, provided those costs are documented and verified.
  4. **Disaster-Affected Households with Unique Hardships**
    - Where households have verified disaster-related needs that cannot be adequately addressed within the standard program cap (e.g., multi-generational homes, households with medical equipment requiring utility modifications).
  5. **Project Financing Structures**
    - For multifamily rental housing projects leveraging external financing (e.g., LIHTC, OHFA gap financing, USDA or FHA programs), exceptions may be made to ensure financial feasibility if justified in underwriting.

#### Approval Process

1. **Request Submission:** Subrecipients must submit a written request for exception, including justification, supporting documentation, and cost estimates.
2. **Development Review:** Development staff will evaluate the request against HUD regulations, national objective requirements, and program policies.
3. **Decision Authority:** The Director of Development (or appropriate designee) will approve or deny requests. Subrecipients will be notified in writing of the decision.
4. **Documentation:** All exceptions will be documented in the designated grants management system, with rationale retained for HUD monitoring and audit purposes.

#### Limitations

- Exceptions will **not** be granted where doing so would result in non-compliance with HUD's national objective requirements (LMI benefit, slum/blight elimination, urgent need).
- Exceptions will **not** be granted where they would cause total program expenditures to exceed the allocations approved in this Action Plan.
- Exceptions will **not** be used to bypass duplication of benefits (DOB) rules; all DOB checks must be completed prior to approval.

## Environmental Review and Compliance

The Responsible Entity (RE) for all environmental reviews under 24 CFR Part 58 will be the Ohio Department of Development. Development will ensure that no project proceeds to construction, choice-limiting action, or commitment of funds until all environmental clearance requirements are satisfied, including compliance with the National Environmental Policy Act (NEPA) and related federal laws and authorities (e.g., historic preservation, floodplains, wetlands, endangered species, noise, and toxic site considerations). Environmental Review Records (ERRs) will be maintained for each project, with findings published and made available for public comment in accordance with HUD regulations. Development will utilize tiered reviews and categorical exclusions where appropriate to streamline compliance while ensuring full protection of environmental resources. All records will be retained and made available for HUD monitoring and audit.

## Administration

Administration of CDBG-DR funds will be carried out by the Ohio Department of Development (Development). Administrative activities are critical to ensuring funds are spent efficiently, in compliance with federal requirements, and in a manner that achieves HUD's national objectives.

### Administrative Cost Allocation

- Development will allocate 5% of the total CDBG-DR award (\$705,800) for administrative costs.
- These funds will support staffing, financial management, compliance monitoring, program reporting, legal services, and technical assistance.
- This allocation is consistent with the limit established in the Allocation Announcement Notice and the Universal Notice, as amended.

### Financial Management and Internal Controls

Development has established financial management and internal control systems consistent with 2 CFR 200.302 and 200.303. These systems ensure:

- Accurate accounting for receipts, disbursements, and balances.
- Adequate safeguards against waste, fraud, and mismanagement.
- Regular reconciliations and segregation of duties.
- Use of a grants management system as the central repository for tracking draws, expenditures, and performance data.

### Procurement

All procurement activities will comply with 2 CFR 200.317–200.327. Key requirements include:

- Maintenance of and adherence to internal procurement policies and procedures consistent with 2 CFR 200.

- Use of competitive procurement methods (RFPs, RFQs, sealed bids).
- Documentation of procurement history and decision-making.
- Adherence to federal and state conflict-of-interest policies.
- Inclusion of Section 3 and Minority/Women-Owned Business Enterprise (M/WBE) participation goals.

### Monitoring and Oversight

Development will implement a comprehensive monitoring strategy to ensure program compliance as outlined in the program Policies and Procedures manual, including:

- **Pre-award risk assessments** of subrecipients and contractors.
- **Desk reviews** of financial and performance reports submitted through a grants management system.
- **On-site monitoring visits** to verify program delivery, procurement compliance, and eligibility documentation.
- **Corrective action plans** where deficiencies are identified, with follow-up to confirm resolution.

### Duplication of Benefits (DOB)

Administrative staff will enforce strict compliance with HUD's duplication of benefits requirements. All applications will be reviewed against FEMA, SBA, private insurance, and other philanthropic or state and local assistance data to ensure CDBG-DR funds serve as funding of last resort. DOB policies and procedures will be published and applied uniformly and include a description/definition of Duplication of benefits.

### Training and Technical Assistance

Development will provide ongoing training and technical assistance to subrecipients, contractors, and program partners on topics including:

- CDBG-DR eligibility and national objectives
- Fair Housing, Equal Opportunity, and Section 504 compliance
- Section 3 hiring and contracting requirements
- Procurement standards and conflict-of-interest rules
- Environmental review procedures

## Reporting

Development will comply with all HUD reporting requirements, including:

- Quarterly Performance Reports (QPRs) in the Disaster Recovery Grant Reporting (DRGR) system.
- Maintenance of documentation to support all reported outputs and outcomes.
- Timely response to HUD monitoring and audit requests.

## Citizen Engagement in Administration

Administrative activities will also include maintaining open channels for citizen feedback and complaints. Development will ensure that complaint procedures, appeals processes, and program performance information are accessible online and in public facilities, in accordance with HUD requirements.

## Planning

The State of Ohio will support ongoing recovery efforts by funding planning activities that inform long-term recovery, resilience, and mitigation strategies in disaster-impacted areas. These activities are intended to ensure that recovery investments are grounded in sound data, coordinated across jurisdictions, and aligned with both local priorities and federal requirements.

Unlike capital programs, planning activities are not designed to produce direct, immediate physical improvements. Instead, they serve as a foundational component of the State's overall recovery approach—guiding future investments, strengthening local capacity, and positioning communities to make informed, strategic decisions related to housing, infrastructure, and economic recovery.

The State anticipates directly administering planning funds as well as providing planning grants to subrecipients, with a focus on projects that address known recovery challenges, advance implementation-ready strategies, and provide technical assistance to build capacity.

## Eligible Activities

Eligible activities under this program include, but are not limited to, planning activities carried out in accordance with 24 CFR 570.205 and applicable provisions of the CDBG-DR Universal Notice. Activities may include, but are not limited to:

- Development of recovery, redevelopment, or resilience plans at the state, county, or local level
- Housing market analyses, including assessments of damage, unmet need, and redevelopment feasibility

- Infrastructure and utility system assessments to identify vulnerabilities and inform future investments, including water, wastewater, and stormwater system evaluations in disaster-impacted areas
- Hazard mitigation and climate resilience planning, including risk assessments, floodplain and drainage analysis, and adaptation strategies
- Environmental and land use planning efforts that support disaster recovery and reduce future risk
- Pre-development planning activities necessary to advance specific recovery projects
- Technical assistance to local governments and stakeholders to support implementation of recovery programs
- Certain costs associated with the development of the Action Plan and subsequent updates or amendments (e.g., costs related to data gathering, analysis, and the impact and unmet needs assessment, etc.)

All planning activities must demonstrate a clear connection to disaster recovery and/or meet mitigation requirements and be consistent with the State's overall recovery priorities.

#### National Objective

Planning activities funded under this program are not required to meet a national objective and will be classified as "N/A" for purposes of national objective compliance, consistent with HUD guidance.

#### Program Design and Allocation Approach

The State expects to incur planning costs directly (e.g., eligible costs for the development of the action plan) and to allocate planning funds directly, with consideration given to projects that are both responsive to identified recovery needs and capable of informing near- to mid-term implementation and building capacity.

In evaluating and prioritizing planning grants, the State may consider factors such as:

- The extent to which the proposed activity addresses a documented recovery or mitigation need
- Alignment with known disaster impacts and unmet needs identified in the Action Plan or hazards identified in the Mitigation Needs Assessment
- Readiness and feasibility of the proposed planning effort
- The potential for the planning activity to lead to actionable, implementation-ready projects

- Coordination with existing local, regional, or state planning efforts to avoid duplication
- The capacity of the applicant or partner entity to successfully complete the planning activity

Planning activities may be undertaken at various geographic scales, including county or statewide levels, depending on the nature of the need being addressed. All planning activities will benefit the MID area.

### Administration of Planning Activities

The State will be responsible for the administration and oversight of all planning activities funded under this program. This includes establishing application or selection procedures (as applicable), ensuring compliance with federal requirements, and monitoring performance and deliverables.

All funded activities will be required to maintain appropriate documentation demonstrating the nexus to disaster recovery and compliance with applicable CDBG-DR requirements.

### Integration with Other Programs

Planning activities funded under this program are intended to directly inform and support the State’s housing, infrastructure, and mitigation programs. Where applicable, the outcomes of planning efforts—such as feasibility studies, site assessments, or redevelopment plans—may be used to guide future funding decisions and project design under other CDBG-DR programs included in this Action Plan.

## Housing

**Table 14: Grantee Housing Programs Overview**

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
New Construction of Single Family Housing	\$3,000,000	100%
Single Family Rehabilitation/Reconstruction	\$800,000	100%
Multi-Family Rental Development	\$3,269,200	100%
Housing Program Total:	\$7,069,200	100%
Total	\$7,069,200	100%

Housing Program Number One – New Construction of Single-Family Housing  
**Program Title:** Logan County New Construction of Single-Family Housing Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$3,000,000

**Eligible Activity(ies):**

- Acquisition and new construction of owner-occupied housing under 24 CFR 570.201 and applicable CDBG-DR requirements.
- Demolition and clearance where necessary to facilitate eligible housing redevelopment activities.
- Relocation assistance as required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act.
- Associated public improvements directly related to housing development.
- Activities incorporating resilience and hazard mitigation consistent with the CDBG-DR Mitigation Set-Aside requirements.

**National Objective:**

- Benefit to low- and moderate-income (LMI) households, consistent with 24 CFR 570.208(a)(3).
- Activities designed to meet an Urgent Need national objective, as applicable and consistent with 24 CFR 570.208(c) and CDBG-DR requirements.

**Lead Agency and Distribution Model:**

The State will distribute funds through a subrecipient model, with Logan County designated as the primary subrecipient responsible for local program administration. The County will implement housing programs in coordination with Development and in compliance with all federal requirements. Logan County will administer the program and implement activities directly through development partners, with Habitat for Humanity expected to serve as an initial partner. To maintain flexibility and ensure adequate production capacity, the County may engage additional qualified developers or contractors if needed to support timely delivery of housing units.

**Program Description:**

The March 2024 tornadoes destroyed or severely damaged more than **880 homes** in Logan County, significantly reducing the county's already limited housing supply and exacerbating affordability challenges for disaster-impacted households. The New Construction of Single-Family Housing Program will directly address this unmet need by creating new, affordable, and resilient housing units that increase the overall housing stock available to support long-term recovery.

Eligible activities include the new construction of new housing units and associated site work necessary to support residential development. Demolition and clearance of unsafe or storm-damaged structures may be undertaken where necessary to facilitate housing redevelopment and site readiness. New housing units will incorporate mitigation and resilience measures designed to reduce risk from future hazard events, including flooding and high-wind conditions.

**Eligible Geographic Areas:**

- Logan County, a HUD-identified MID area, with priority given to the impacted residents of the Villages of Lakeview and Russells Point and surrounding Stokes and Washington Townships, where concentrations of LMI and Urgent Need qualifying households reside. To support feasible project delivery and maximize housing production, newly constructed housing units may be developed within these prioritized communities or elsewhere within Logan County, as appropriate based on site availability, project feasibility, and program needs.

**Application Process and Other Eligibility Criteria:**

- Applicants must demonstrate a disaster-related housing need resulting from displacement, loss of housing availability, or other impacts from the March 2024 tornadoes.
- Applicants must complete Logan County’s intake process, including income verification, DOB checks, and homeownership readiness assessments.
- Priority categories will include:
  - LMI households residing in the HUD-identified MID area.
  - Households with elderly or disabled members.
  - Households with children under 18.

**Maximum Amount of Assistance Per Beneficiary:**

Awards are capped at \$180,000 per newly constructed unit based on the estimated construction cost of \$160,000 per household. Final award amounts may vary based on site conditions, construction requirements, and applicable mitigation measures.

**Maximum Income of Beneficiary:**

Household income must not exceed 120% of Area Median Income (AMI), with priority given to households at or below 80% AMI.

**Mitigation Measures:**

Development will fully integrate mitigation planning, funding, and implementation into all housing programs while maintaining clear separation of base project funds and mitigation set-aside funds. Mitigation funding will be tracked and managed as a distinct budget line item within each project. The per-unit cap of \$150,000 for the New Construction of Single-Family Housing Program applies

only to the base housing construction cost and excludes mitigation enhancements. Separate mitigation funds, drawn from the CDBG-DR 15 percent mitigation set-aside, will be available for approved mitigation activities that directly reduce risk from the county's identified hazards (flooding and high-wind events) and will be capped at 20 percent of the per-unit cost limit applicable to the appropriate project (this is in addition to the base per-unit cost limit and only applicable to mitigation activities using mitigation funding). Subrecipients may address other mitigation goals and strategies identified through the county's plan that don't directly address flooding and high-wind events if it is demonstrated that sufficient minimum mitigation requirements are met.

For single-family housing projects, eligible mitigation expenses may include, but are not limited to:

- Elevation of homes in FEMA floodplains to Base Flood Elevation (BFE) + 2 feet;
- Construction of FEMA P-361 compliant safe rooms for homes without basements;
- Elevation or relocation of critical utilities (e.g., HVAC, electrical panels) above flood levels; and
- Site drainage improvements and use of flood-resistant building materials.

Mitigation features will be identified and approved through a project-level scoring rubric developed by Development in consultation with the Logan County Emergency Management Agency (EMA) and other applicable entities. The rubric will evaluate at a minimum:

- Relevance to Identified Hazards – mitigation measures must align with Logan County's Hazard Mitigation Plan priorities;
- Feasibility and Cost-Effectiveness – technical and financial viability of mitigation features;
- Risk Reduction Impact – quantifiable hazard-reduction benefit to occupants and surrounding community; and
- Compliance with FEMA, HUD, and other proscribed resilience standards.

Projects demonstrating the highest hazard-reduction benefit and cost-effectiveness may be prioritized for additional mitigation funding if available.

Subrecipients will be required to submit project applications that clearly delineate:

- The base project budget;
- The mitigation enhancement budget; and
- How the mitigation component contributes to overall risk reduction.

All mitigation expenditures will be tracked in Development's designated grants management

system and reported separately in HUD's DRGR under the mitigation set-aside category to ensure compliance with the 15 percent requirement.

**Award Caps and Exceptions:**

- Awards are capped at \$180,000 per household based on estimated reconstruction costs.
- Exceptions may be granted for accessibility modifications (e.g., ramps, widened doorways) or extraordinary construction costs (e.g., foundation work, floodplain elevation) in accordance with the General Exception Criteria.

**Duplication of Benefits (DOB):**

- CDBG-DR funds will serve as gap financing after all other sources of assistance (FEMA IA, SBA loans, insurance proceeds) are applied.
- Applicants must submit documentation of all leveraged funds received for the project; Development will verify.
- Any duplication will be deducted from the award.

**Reducing Impediments for Assistance**

- Outreach will prioritize vulnerable populations in MID areas, including renters transitioning to ownership, mobile home residents, and households in poverty.
- Reasonable accommodations will be provided to applicants with disabilities, consistent with Section 504 of the Rehabilitation Act.
- Exceptions may be granted for accessibility needs, site-specific construction challenges, or other conditions consistent with the General Exception Criteria.

**Oversight and Compliance:**

- Logan County will maintain applicant files documenting eligibility, DOB calculations, income verification, and property disposition.
- Development will monitor Logan County through desk reviews, on-site inspections, and financial audits per 2 CFR Part 200.
- Construction activities will comply with environmental review requirements under 24 CFR Part 58 and fair housing laws.
- Program outputs (number of homes constructed, % LMI households served) will be tracked and reported quarterly, at a minimum, in HUD's DRGR system.

Housing Program Number Two – Single-Family Rehabilitation/Reconstruction

**Program Title:** Logan County Single-Family Rehabilitation and Reconstruction Housing Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$800,000

**Eligible Activity(ies):**

- Rehabilitation and reconstruction of owner-occupied housing, as eligible under 24 CFR 570.201 and applicable CDBG-DR requirements.
- Demolition and clearance activities where necessary to facilitate reconstruction or site preparation.
- Relocation assistance as required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d) of the Housing and Community Development Act.
- Associated public improvements directly related to housing rehabilitation or reconstruction
- Environmental review prior to construction in accordance with 24 CFR Part 58.
- Activities incorporating resilience and hazard mitigation consistent with the CDBG-DR Mitigation Set-Aside requirements as outlined in the following section.

**National Objective:**

- Benefit to low- and moderate-income (LMI) households, consistent with 24 CFR 570.208(a)(3).
- Activities designed to meet an Urgent Need national objective, as applicable and consistent with 24 CFR 570.208(c) and CDBG-DR requirements.

**Lead Agency and Distribution Model:**

The State will distribute funds through a subrecipient model, with Logan County designated as the primary subrecipient responsible for local program administration. The County will implement housing programs in coordination with Development and in compliance with all federal requirements. Where applicable, Logan County may further procure contractors, developers, or service providers through competitive procurement processes consistent with 2 CFR Part 200.

**Program Description:**

The March 2024 tornadoes caused widespread damage to owner-occupied housing throughout Logan County, leaving many homes structurally compromised, unsafe, or in need of substantial repair. Some properties were completely destroyed and will need to be reconstructed while a significant number of homes sustained moderate to severe damage that did not result in total loss but still require substantial investment to restore habitability.

The Single-Family Rehabilitation and Reconstruction Program is designed to address these unmet housing needs by providing assistance to repair or reconstruct disaster-damaged owner-occupied homes. The program supports long-term recovery by preserving existing housing stock, restoring safe and sanitary living conditions, and stabilizing neighborhoods impacted by the disaster.

Assistance will be provided through two primary activity types:

- Rehabilitation, which includes the repair of disaster-damaged homes that remain structurally sound and can be restored to a safe and habitable condition; and
- Reconstruction, which involves the replacement of homes where rehabilitation is not feasible due to the extent of damage, cost considerations, or code requirements.

The determination of whether a home will be rehabilitated or reconstructed will be based on a property-specific assessment of damage, structural integrity, and cost reasonableness. As a general guideline, reconstruction may be pursued when the cost of rehabilitation meets or exceeds a defined feasibility threshold relative to reconstruction costs.

Eligible activities may include structural repairs, replacement of major systems, code-required upgrades, accessibility improvements, and other work necessary to restore the home to a safe, decent, and sanitary condition. Demolition and clearance may be undertaken where necessary to facilitate reconstruction or address unsafe conditions.

All assisted properties must demonstrate a clear tie to disaster-related damage, and program funds will be used only to address unmet needs after accounting for other sources of assistance, including insurance, FEMA, and other recovery resources.

Construction activities will be carried out by procured contractors and must comply with applicable federal, state, and local requirements, including environmental review, labor standards, and building codes. Where applicable, projects will incorporate resilience and hazard mitigation measures to reduce the risk of future damage.

The program is intended to support a comprehensive housing recovery strategy by focusing on the repair and reconstruction of owner-occupied homes that sustained direct disaster-related damage, while complementing separate single-family new construction activities designed to expand the overall housing supply within Logan County.

**Eligible Geographic Areas:**

- Logan County, a HUD-identified MID area, with priority given to impacted residents of the Villages of Lakeview and Russells Point and surrounding Stokes and Washington Townships, where concentrations of LMI and Urgent Need qualifying households reside.

**Application Process and Other Eligibility Criteria:**

- Applicants must demonstrate displacement or damage from the March 2024 tornadoes.
- Applicants must complete Logan County’s intake process, including income verification, DOB checks, and homeownership readiness assessments.
- Priority categories will include:
  - LMI households residing in the HUD-identified MID area.
  - Households with elderly or disabled members.

- Households with children under 18.

**Maximum Amount of Assistance Per Beneficiary:**

Maximum assistance amounts will be established based on the type of activity and cost reasonableness standards. The award amount for each household will be the lesser of:

- The total eligible cost of the approved scope of work; or
- The applicable program cap.

Exceptions may be considered for accessibility modifications, site-specific conditions, or other reasonable accommodations, consistent with the General Exception Criteria.

**Maximum Income of Beneficiary:**

Household income must not exceed 120% of Area Median Income (AMI), with priority given to households at or below 80% AMI. Assistance provided under the Urgent Need national objective will be limited to households with incomes not exceeding 120% of AMI.

**Mitigation Measures:**

The program will incorporate mitigation planning, funding, and implementation into all eligible rehabilitation and reconstruction activities to reduce the risk of future damage and improve long-term housing resilience. Mitigation measures will be designed to address hazards identified in the disaster and local hazard mitigation planning efforts, including high-wind events, severe storms, and flooding.

Mitigation activities may be integrated into the approved scope of work where necessary to protect the structural integrity of the home, improve durability, and reduce the likelihood of future disaster-related impacts. These measures will be incorporated in a manner that is cost-effective, feasible, and consistent with applicable building codes and federal requirements.

Where applicable, mitigation measures will be aligned with the State and local Hazard Mitigation Plan and incorporated into project design to ensure consistency with long-term risk reduction strategies.

Mitigation costs will be evaluated for reasonableness and effectiveness and may be funded as part of the overall project cost or through available CDBG-DR mitigation set-aside funds, as applicable. Mitigation investments will be prioritized for properties located in higher-risk areas or where the potential for future damage is greatest.

All mitigation activities must be clearly tied to identified risks, supported by project documentation, and compliant with environmental review requirements and applicable federal, state, and local regulations.

**Award Caps and Exceptions:**

- Awards are capped at \$52,000 per household for rehabilitation based on estimated cost of construction.
- Awards are capped at \$ 140,000 per household for reconstruction, reflecting the higher costs associated with full replacement of a structure when rehabilitation is not feasible

**Duplication of Benefits (DOB):**

- CDBG-DR funds will serve as gap financing after all other sources of assistance (e.g., FEMA IA, SBA loans, insurance proceeds) are applied.
- Applicants must submit documentation of all assistance received; Development will verify against FEMA, SBA, insurance, and other data.
- Any duplication will be deducted from the CDBG-DR award.

**Reducing Impediments for Assistance:**

- The program will include outreach, application assistance, and reasonable accommodations to ensure access for eligible households, including populations that may face barriers to recovery.
- Reasonable accommodations will be provided to applicants with disabilities, consistent with Section 504 of the Rehabilitation Act.

**Oversight and Compliance:**

- Logan County will maintain applicant files documenting eligibility, DOB calculations, income verification, and property disposition.
- Development will monitor Logan County through desk reviews, on-site inspections, and financial audits per 2 CFR Part 200.
- Construction activities will comply with environmental review requirements under 24 CFR Part 58 and fair housing laws.
- Program outputs (number of homes constructed, % LMI households served) will be tracked and reported quarterly, at a minimum, in HUD’s DRGR system.

Housing Program Number Three – Multifamily Rental Development

**Program Title:** Logan County Multifamily Rental Development Program

**Amount of CDBG-DR Funds Allocated to this Program:** \$3,269,200

**Eligible Activity(ies):**

- Acquisition of real property under 24 CFR 570.201(a), rehabilitation under 24 CFR 570.202, and new construction of rental housing as authorized under applicable CDBG-DR requirements.

- Site improvements directly related to multifamily housing development.
- Relocation assistance as required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and Section 104(d).
- Activities incorporating resilience and hazard mitigation consistent with the CDBG-DR Mitigation Set-Aside requirements.

**National Objective:**

- Benefit to low- and moderate-income (LMI) households, per 24 CFR 570.208(a)(3).
- Activities designed to meet an Urgent Need national objective, as applicable and consistent with 24 CFR 570.208(c) and CDBG-DR requirements.

**Lead Agency and Distribution Model:**

The State will distribute funds through a subrecipient model, with Logan County designated as the primary subrecipient responsible for local program administration. The County will implement housing programs in coordination with Development and in compliance with all federal requirements. Where applicable, Logan County may further procure contractors, developers, or service providers through competitive procurement processes consistent with 2 CFR Part 200. Planning activities may be administered directly by the State or in partnership with local entities, depending on project scope.

**Program Description:**

The March 2024 tornadoes displaced hundreds of households across Logan County, particularly in the Villages of Lakeview and Russells Point and surrounding Stokes and Washington Townships. Many impacted households were renters living in LMI neighborhoods where the existing supply of affordable rental housing was already limited prior to the disaster. The loss of rental units has created a sustained housing gap, increasing pressure on the remaining housing stock and limiting options for displaced residents seeking to return to their communities.

This program will be administered through a subrecipient agreement with Logan County, overseeing project proposals developed in coordination with the Logan County Metropolitan Housing Authority (MHA). Logan County was selected as the subrecipient because it serves as the primary local governing authority for the communities most affected by the tornadoes. Their established role in countywide planning make them best positioned to guide multifamily development that meets local needs and supports long-term community stability.

CDBG-DR funding will be used for the construction of multifamily housing for LMI households and may be further leveraged as gap financing in partnership with private and nonprofit developers. Projects may utilize a portion of the allocation (or all if the need is demonstrated) to support an application for 4% or 9% Low-Income Housing Tax Credits (LIHTC) through the Ohio Housing Finance Agency (OHFA). Projects must demonstrate efforts to obtain additional sources of funding such as LIHTC or other state and local funds or a detailed explanation on why other funding is not

available before being submitted and approved for CDBG-DR funds. By combining CDBG-DR funds with LIHTC, project-based vouchers, or other financing, the program can deliver affordable units at a significantly lower cost per unit than if funded solely with CDBG-DR dollars. Projects may be funded solely with CDBG-DR dollars if it is demonstrated why other funding is not available for the project.

CDBG-DR funds will support resilient multifamily construction in accordance with Development's applicable standards.

The Logan County MHA will be responsible for marketing newly constructed units in accordance with an Affirmative Fair Housing Marketing Plan (AFHMP) that must be provided to Development prior to the start of marketing or lease-up.

**Eligible Geographic Areas:**

- Logan County, a HUD-identified MID area, with eligible projects permitted anywhere within county limits. Priority will be given to projects that serve displaced renters and LMI households from the Villages of Lakeview and Russells Point and the surrounding Stokes and Washington Townships, as well as other areas of demonstrated rental housing need within the county.

**Application Process and Other Eligibility Criteria:**

- Logan County will identify and select projects in compliance with state and federal law.
- Logan County will issue a direct award to the Logan County Metropolitan Housing Authority to serve as the Developer for this program.
- Logan County also reserves the right to issue a competitive Request for Proposals (RFP) to identify qualified development partners as necessary and in compliance with state and federal law.
- Developers must demonstrate capacity, financial feasibility, and a commitment to affordability.
- Priority will be given to projects that:
  - Replace units destroyed or lost due to disaster.
  - Incorporate universal design and accessibility features.
  - Demonstrate resilience to future disasters (e.g., tornado-safe construction, storm and flood-resistant utilities).

**Maximum Income of Beneficiary:**

Households served must meet HUD income eligibility requirements: not more than 120% AMI with at least 51% of units reserved for ≤80% AMI households.

## **Mitigation Measures:**

Development will fully integrate mitigation planning, funding, and implementation into all housing programs while maintaining clear separation of base project funds and mitigation set-aside funds. Mitigation funding will be tracked and managed as a distinct budget line item within each project. The per-unit cap for the Multifamily Rental Development Program applies only to the base construction cost and excludes mitigation enhancements for activities utilizing mitigation funding. Separate mitigation funds, drawn from the CDBG-DR 15 percent mitigation set-aside, will be available for approved mitigation activities that directly reduce risk from the county's identified hazards (such as flooding and high-wind events) and will be capped at 20% of the per-unit cost limit applicable to the appropriate project (this is in addition to the base per-unit cost limit and only applicable to mitigation activities using mitigation funding). Subrecipients may address other mitigation goals and strategies identified through the county's plan that don't directly address flooding and high-wind events if it is demonstrated that sufficient minimum mitigation requirements are met.

For multifamily housing projects, mitigation activities may include, but are not limited to:

- Incorporation of storm shelters or common-area safe rooms;
- Resilient site design (e.g., permeable paving, stormwater detention systems);
- Elevation or waterproofing of mechanical, electrical, and plumbing systems; and

Mitigation features will be identified and approved through a project-level scoring rubric developed by Development in consultation with the Logan County Emergency Management Agency (EMA) and other applicable entities. The rubric will evaluate at a minimum:

- Relevance to Identified Hazards – mitigation measures must align with Logan County's Hazard Mitigation Plan priorities;
- Feasibility and Cost-Effectiveness – technical and financial viability of mitigation features;
- Risk Reduction Impact – quantifiable hazard-reduction benefit to occupants and surrounding community; and
- Compliance with FEMA, HUD, and other proscribed resilience standards.

Projects demonstrating the highest hazard-reduction benefit and cost-effectiveness may be prioritized for additional mitigation funding if available.

Subrecipients will be required to submit project applications that clearly delineate:

- The base project budget;
- The mitigation enhancement budget; and
- How the mitigation component contributes to overall risk reduction.

All mitigation expenditures will be tracked in Development's designated grants management system and reported separately in HUD's DRGR under the mitigation set-aside category to ensure compliance with the 15 percent requirement.

### **Award Caps and Exceptions**

- Awards are capped at \$3,269,200 per project, not to exceed the applicable per-unit cost limit.
- Projects will use the cost-containment standards consistent with those established by the Ohio Housing Finance Agency (OHFA) for 4 percent Low-Income Housing Tax Credit (LIHTC) projects in rural counties, or an alternative per-unit cost if approved by Development at the time of project review.
- Under OHFA's 2025 4 Percent LIHTC Cost Containment Standards, the total direct cost per unit is capped at \$352,000 for new construction and \$272,000 for rehabilitation. However, the per-unit cap will correspond with the most recent approved cost standard for the 4 Percent LIHTC program at the time projects are submitted to Development.
- Exceptions to caps may be considered for projects with extraordinary site preparation costs or where required for financial feasibility, consistent with the General Exception Criteria.
- Separate mitigation funds, drawn from the CDBG-DR 15 percent mitigation set-aside, will be available for approved mitigation activities that directly reduce risk from the county's identified hazards (such as flooding and high-wind events) and will be capped at 20 percent of the per-unit cost limit applicable to the appropriate project (in addition to its regular cost limit).
- Projects must demonstrate efforts to obtain additional financing for leveraging, with preference for LIHTC or other federal/state affordable housing programs.
- Exceptions to funding caps may be considered for projects with extraordinary site preparation costs or where necessary to ensure project feasibility, consistent with the General Exception Criteria.

### **Duplication of Benefits (DOB):**

- Development and its subrecipient will ensure CDBG-DR funds do not duplicate other sources of recovery assistance.
- Projects must disclose all committed funding sources. DOB reviews will be conducted at both the project underwriting stage and prior to disbursement of funds.
- Funds will only cover unmet costs after insurance, FEMA PA, SBA, or other resources are applied.

### **Reducing Impediments for Assistance**

- Units will be marketed affirmatively in compliance with the Fair Housing Act and HUD’s Affirmative Fair Housing Marketing Plan (AFHMP) requirements.
- Outreach will target displaced renters, elderly households, and persons with disabilities.
- Reasonable accommodations will be provided throughout the application and leasing process.

**Oversight and Compliance:**

- Logan County will oversee procurement, contracting, and compliance with 2 CFR Part 200 procurement standards.
- The MHA or a selected developer or property manager will maintain records on tenant eligibility, lease terms, income verification, and unit affordability periods.
- Development will monitor projects to ensure program compliance throughout the grant lifecycle.
- Environmental reviews under 24 CFR Part 58 will be completed prior to release of funds.
- Program outputs (number of units completed, % affordable to LMI households, leverage ratios) will be tracked in HUD’s DRGR system and reported quarterly, at a minimum.

## Infrastructure

**Table 15: Grantee Infrastructure Programs Overview**

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
<b>Logan County Infrastructure Recovery and Resilience Program</b>	\$4,000,000	100%
<b>Infrastructure Program Total:</b>	\$4,000,000	100%
<b>Total</b>	\$4,000,000	100%

### Infrastructure Programs Overview

**Program Title:** Logan County Infrastructure Recovery and Resilience Program

**Amount of CDBG-DR Allocated to this Program:** \$4,000,000

**Eligible Activity(ies):**

- Public facilities and improvements, including water and sewer line extensions, stormwater management systems, and utility hardening, under 24 CFR 570.201(c).
- Environmental review prior to construction in accordance with 24 CFR Part 58.
- Activities incorporating resilience and hazard mitigation consistent with the CDBG-DR Mitigation Set-Aside requirements as identified below.

**National Objective:**

- Area benefit to low- and moderate-income (LMI) residents under 24 CFR 570.208(a)(1).

**Lead Agency and Distribution Model:**

The State will distribute funds through a subrecipient model, with Logan County designated as the primary subrecipient responsible for local program administration. The County will implement the infrastructure program in coordination with Development and in compliance with all federal requirements. Where applicable, Logan County may further procure contractors, developers, or service providers through competitive procurement processes consistent with 2 CFR Part 200. Planning activities may be administered directly by the State or in partnership with local entities, depending on project scope.

**Program Description:**

Infrastructure was identified in the Unmet Needs Assessment as the most cost-prohibitive barrier to housing recovery in Logan County. The March 2024 tornadoes caused widespread damage to utility systems, particularly water and sewer lines, and revealed long-standing gaps in service access. FEMA Public Assistance (PA) and local estimates indicated more than **\$15 million in utility and public works need**, yet local and state funds cannot fully address the needs. In addition, many households in the Villages of Lakeview and Russells Point and surrounding Stokes and Washington Townships remain in areas without adequate water or sewer service, preventing the redevelopment of tornado-destroyed housing.

This program will fund water, sewer, and related public utility projects within Logan County, a HUD-identified MID area, where concentrations of LMI households reside. See **Table 11: Logan County Local Jurisdictions Proposed Infrastructure Projects** from Part 2. which estimates Unmet Needs for a list of potential infrastructure projects that may be selected from. If additional projects are proposed aside from the provided list, Development may approve with proper justification presented by the subrecipient and these projects must be included in the project selection process outlined below.

Selected projects will address flood- and stormwater-related vulnerabilities or an additional hazard mitigation strategy identified by the county’s hazard mitigation plan if approved by Development. Possible examples include the elevation or floodproofing of utility systems, installation of backflow preventers, replacement of storm sewers and lift stations, and the hardening of electrical and communication systems.

**Eligible Geographic Areas:**

- Logan County, a HUD-identified MID area, with priority given to the **Villages of Lakeview and Russells Point** and surrounding **Stokes and Washington Townships**, where concentrations of LMI households reside.

**Application Process and Other Eligibility Criteria:**

- Logan County will serve as the subrecipient for infrastructure funds. As the governing body responsible for advancing public infrastructure and community development priorities, the Board brings both the institutional capacity and prior experience implementing non-DR CDBG projects, positioning them to competently manage programmatic responsibilities, including the review and approval of project applications.
- Logan County will utilize a transparent, data-driven project selection process to identify infrastructure projects that most effectively address unmet recovery and mitigation needs. Because identified infrastructure needs total more than \$15 million and only \$4 million is available, a formal Project Evaluation and Prioritization Rubric will be used to ensure fair and defensible funding decisions.
- Notices of proposed infrastructure projects and scoring criteria will be published on the County website and posted in local newspapers. Proposed projects must be included in the published agenda or other applicable notice prior to the commissioner’s meeting(s) where projects are approved. At least one public meeting must be provided to allow residents the opportunity to provide verbal and written comments in regard to the proposed projects and scoring. This can be a commissioner’s meeting if a public notice is sent out accordingly.
- Each eligible project will be scored against objective criteria, which will be incorporated into the Infrastructure Program Policies and Procedures and shared publicly during the application phase. The proposed criteria, subject to amendment at the discretion of Logan County, may include:

<b>Criterion</b>	<b>Description</b>	<b>Weight (Percent of Total Score)</b>
LMI Benefit / National Objective Compliance	Extent to which the project benefits low- and moderate-income (LMI) persons through area benefit or direct benefit. Documentation of qualifying service area required.	<b>30%</b>

Disaster Impact / Hazard Mitigation Effectiveness	Degree to which the project addresses documented damages from the March 2024 disaster and mitigates future risks (e.g., flooding, tornado, or wind).	<b>25%</b>
Readiness to Proceed	Availability of design documents, environmental clearance status, site control, and procurement readiness.	<b>20%</b>
Cost-Effectiveness and Leveraging	Demonstration of reasonable cost per beneficiary and evidence that other state, federal, or local funding sources have been pursued and exhausted.	<b>15%</b>
Community Priority and Public Input	Alignment with Logan County’s long-term recovery plan, local hazard mitigation priorities, and outcomes of public comments.	<b>10%</b>

The final scoring criteria determined will be subject to review by Development to ensure it meets program requirements. Additionally, the final scoring for each project is subject to review by Development prior to the final project selection. Logan County Commissioners will be encouraged to communicate with Development throughout this process to ensure proper compliance with CDBG-DR requirements.

- Projects must score a minimum of 70 out of 100 percent to be recommended for funding.
- Eligible applicants or partners may include municipalities, utility providers, and nonprofit development partners serving the impacted communities. Applicable procurement laws must be followed when determining how project work will be completed.
- Projects must demonstrate:
  - Location within a HUD-identified MID area.
  - Primary benefit to LMI residents (documented through Census/ACS/CHAS data).
  - Clear incorporation of mitigation and resilience measures if that eligible activity is requested.

**Selection Process and Oversight**

1. **Initial Application:** Logan County will solicit proposals from local jurisdictions and utility providers within the impacted areas. Applications must include scope, budget, LMI service area documentation, and mitigation outcomes.
2. **Scoring and Ranking:** County staff will score projects using the rubric above and develop a ranked list of recommended projects.

3. **State Review:** Development will review all rankings to ensure consistency with federal requirements, confirm eligibility, and verify that the highest-scoring projects proportionally address documented unmet needs from the Unmet Needs and Mitigation Assessments.
4. **Public Notification:** Notices of proposed infrastructure projects and preliminary rankings will be published on the County website. A 15-day comment period will accompany the posting of preliminary project rankings and funding recommendations, during which community members can provide input before final selection.
5. **Determination:** Logan County will make final project selections based on the highest-scoring projects that most responsibly and responsively meet the funding criteria, County goals, and feedback received during the public comment period.
6. **Documentation:** The complete scoring matrix, justification, and approval documentation will be retained in the project file.

**Maximum Income of Beneficiary:**

Not applicable. The program meets a national objective through area benefit to low- and moderate-income (LMI) residents.

**Mitigation Measures:**

To qualify for MIT set-aside funding, all infrastructure projects must incorporate one or more of the following resilience features:

- Wind-resistant or underground utility systems.
- Storm-hardened water and sewer lift stations with reinforced housings.
- Back-up power systems for critical water and wastewater facilities.
- Stormwater management improvements (e.g., retention basins, green infrastructure) to mitigate localized flooding.
- Utility routing and design to avoid floodplains and other hazard-prone areas.
- Additional mitigation activities that address applicable hazards upon request and approval by Development.

**Award Caps and Exceptions:**

- Development may allow up to 100 % of the Infrastructure allocation to be applied to a single project, provided costs are reasonable and the project meets program requirements.
- Exceptions may be considered where additional resilience investments significantly increase costs, per the General Exception Criteria.

**Duplication of Benefits (DOB):**

- Infrastructure projects will be cross-checked against FEMA PA, Hazard Mitigation Grant Program (HMGP), State Revolving Fund (SRF), and other sources to prevent duplication.
- Funds will only cover unmet costs not addressed by other assistance.

**Reducing Impediments for Assistance:**

- Projects will prioritize neighborhoods with high concentrations of LMI households, including elderly and disabled residents who are disproportionately affected by inadequate utilities.
- Development will ensure ADA-compliant engagement and targeted outreach during project design and construction.

**Oversight and Compliance:**

- The Logan County Board of Commissioners will maintain procurement records, contracts, project budgets, and performance data.
- Development will conduct pre-award risk assessments, financial reviews, and on-site inspections.
- All infrastructure activities will undergo environmental review under 24 CFR Part 58.
- Program outputs (linear feet of water/sewer installed, number of households served, % LMI benefit, mitigation features included) will be tracked in HUD’s DRGR system and reported quarterly, at a minimum.

## Part 5. General Information

### Citizen Participation – Outreach Efforts

Development followed HUD’s citizen participation requirements by engaging local officials, housing providers, finance agencies, and service organizations in the design of this Action Plan. Outreach efforts ensured transparency, inclusion of low- and moderate-income (LMI) households, and meaningful opportunities for comment.

**Consultation in Developing the Action Plan**

- Development consulted with the **Logan County Board of Commissioners**, the **Logan County Land Bank**, **Habitat for Humanity of Logan County**, the **Logan County Metropolitan Housing Authority (MHA)**, **Logan County Long Term Recovery Committee**, and local utility providers to identify unmet needs and program priorities.
- Development initiated discussions with the **Ohio Housing Finance Agency (OHFA)** immediately following the disaster to determine whether any OHFA-financed or MHA-partnered properties in Logan County were affected. OHFA confirmed that no joint-financed projects were impacted, as the vast majority of damage occurred in single-family housing.

However, OHFA provided ongoing technical support and remains available to coordinate on future affordable housing opportunities.

- Conversations with the **MHA** were reignited as recovery planning progressed and community priorities became clearer. MHA identified an earlier **LIHTC application that had not moved forward** and, with the influx of CDBG-DR dollars, intends to revisit the project in partnership with Development and another housing authority. The revised approach will pursue **4% LIHTC credits**, which present a less strenuous application process than the previously proposed 9% credits.
- Development also reached out to the lead entity for the **six-county Continuum of Care (CoC) region encompassing Logan County** immediately after the disaster to assess homeless service needs. The CoC lead reported only a handful of disaster-related displacements in surrounding counties, which were absorbed by existing shelters and services. Logan County’s two homeless shelters confirmed they had **no unmet needs related to the tornado**, and the CoC did not identify longer-term disaster-related homelessness issues in subsequent communication.
- State and federal partners, including **HUD Columbus Field Office staff**, were consulted to ensure alignment with federal requirements and available housing finance tools.
- A summary of consultations and input is provided in **Table 14**.

**Table 16 – Consultation Matrix**

<b>Entity / Stakeholder</b>	<b>Date(s) of Consultation</b>	<b>Role / Expertise</b>	<b>Key Input / Takeaways</b>	<b>Impact on Action Plan</b>
Logan County Board of Commissioners	March–May 2024	County leadership, program oversight	Identified housing and infrastructure recovery priorities; emphasized need for utility extensions in Lakeview and Russells Point	County designated as subrecipient for infrastructure and housing program oversight
Logan County Land Bank	Apr-24	Blight removal, property management	Provided list of 37 unsafe structures needing demolition	Led to establishment of Demolition and Clearance activities
Habitat for Humanity of Logan County	April–June 2024	Affordable homeownership	Identified unmet single-family housing needs, capacity to deliver replacement homes	Established as potential subrecipient for Single-Family Replacement Housing Program

Metropolitan Housing Authority (MHA)	April–August 2024	Affordable rental housing	Revisited prior LIHTC project; discussed use of CDBG-DR to leverage 4% credits	Informed Multifamily Rental Development Program design
Ohio Housing Finance Agency (OHFA)	March–August 2024	State housing finance	Confirmed no OHFA-financed projects impacted; advised single-family should stay with Development; offered technical support for multifamily	Guided partnership framework and clarified allocation split between single-family and multifamily
Continuum of Care (CoC) – Six County Region	March 2024 & July 2024	Homeless services	Confirmed shelters had capacity; no long-term disaster-related homeless surge identified	Supported rationale for not establishing Public Services program
Local Utility Providers	April–May 2024	Water, sewer, electric	Confirmed tornado damage to utility lines; identified high cost of extensions to impacted neighborhoods	Strengthened case for Infrastructure Recovery and Resilience Program
HUD Columbus Field Office	May-24	Federal program oversight	Provided technical guidance on Universal Notice compliance	Ensured plan alignment with HUD requirements

### Public Comments

- The Draft Action Plan was published on the **Ohio Department of Development website** and made available in hard copy at the Logan County Commissioners’ office on May 20, 2025.
- Public notice was provided in **local newspapers**, through **press releases**, and via **email distribution lists** of community partners.
- The public comment period remained open for the HUD-required 30 days, from **May 20, 2025** through **June 18, 2025**.
- Written comment opportunity was provided for feedback on the draft plans; only one written comment was submitted.
- Common themes of feedback included:

- Need for prioritization of affordable rental housing.
- Requests for additional infrastructure investment in Stokes and Washington Townships.

**Public Hearings**

- Development held a **public hearing** at the Riffe Center in Downtown Columbus with the option for virtual engagement to present the Draft Action Plan and solicit feedback.
- The hearing was advertised at least **two weeks in advance** per applicable requirements.
- ADA accommodations were available to ensure full participation by persons with disabilities.

**Consideration of Public Comments**

All comments were reviewed and incorporated into the final Action Plan where appropriate. For example:

- Allocation to multifamily rental housing was re-evaluated in response to comments about renter needs and to improve project feasibility.
- The infrastructure program description and needs assessment were updated to consider the breadth of need identified by stakeholders.
- Updates were made throughout plan, but particularly in the program description to ensure clarity.

A detailed matrix of comments and Development’s responses is included in **Table 15** below.

**Table 17 – Public Comments Response**

Comment Received	Grantee’s Response
A number of comments were received in complete support of the plan and excitement for this opportunity. One stated that there needs to be an emphasis on infrastructure needs in the Midway area, specifically the roads and sewers.	We appreciate the comments received. The final version of the plan now includes a list of infrastructure projects needed for community recovery, including several water and sewer projects in the Midway area.
Supports the plan with more money for infrastructure for health and safety of the community. Concern about the well in the area and how they are not up to code.	We appreciate the comments received and have taken concerns into consideration in the infrastructure components of the plan.
One recognized that the damage to infrastructure is huge but shows concern that most of the buildings were grandfathered in	We appreciate the comments received. The current allocation addresses the financial barriers of multi-family construction without

<p>and not up to code. Showed concern that new building codes could cause barriers and higher costs. Commented that there should be more money for demolition and infrastructure. Infrastructure around the lake is a big concern. There is major support of multifamily units to increase the number of families they can help.</p>	<p>pulling funds significantly from other projects, including those for demolition and infrastructure.</p>
<p>Supports the plan and would like to see more money going to Lakeview.</p>	<p>We appreciate the comments received. Lakeview is listed as a priority area where subrecipients may utilize funds if the program requirements are met.</p>
<p>Massive support for the plan and described how it was developed using input and recommendations from the local community recovery committee. Talked about how the mitigation set aside money will allow Logan County to help flood prone areas beyond just tornado damaged areas, helping the community be proactive in case of future disasters.</p>	<p>We appreciate the comments received and have acknowledged both the direct disaster damage and flood mitigation needs.</p>
<p>Expressed concerns with the housing section and believed another review was needed to ensure the costs were totaled correctly and the descriptions were clear.</p>	<p>We appreciate the comments received. The plan was reviewed and edited to ensure cohesion in the proposed allocation and clarity in project descriptions.</p>
<p>One written comment expressed concern that the number of homes destroyed indicated on page 16 do not match either numbers from the federal number and local EMA. Another concern was the \$0 under Planning on page 19 but shows 1,000,000 on Page 7. It was also clarified that Lakeview and Russells Point are both villages, not cities.</p>	<p>We appreciate the comments received. The listed errors were reviewed to determine any necessary corrections.</p>

Citizen Participation for Substantial Amendment - Version No. 2

In accordance with HUD requirements and the State’s Citizen Participation Plan, Development conducted a targeted citizen participation process for this Substantial Amendment to the CDBG-DR Action Plan.

A draft of the Substantial Amendment was made available for public review and comment for a period of not less than 30 days from April 22<sup>nd</sup>, 2026, through May 21<sup>st</sup>, 2026. The draft amendment was published on Development’s website and made available in accessible formats upon request. Public notice of the comment period was provided through direct outreach to community stakeholders, and distribution lists maintained by Development and Logan County.

Development coordinated with Logan County and local partners to ensure that outreach efforts were directed toward residents and stakeholders in the most impacted and distressed areas, including the Villages of Lakeview and Russells Point and surrounding townships.

One public hearing was conducted on April 22<sup>nd</sup>, 2026, to present the proposed amendment and receive input from residents, community organizations, and other interested parties. The hearing was held in a location accessible to affected communities, and reasonable accommodations were made available upon request to support participation.

All comments received during the public comment period were reviewed and considered prior to submission of this amendment to HUD. A summary of comments received, along with Development’s responses, is included below.

**Table 18 – Substantial Amendment No. 2 - Public Comments Response**

Comment Received	Grantee’s Response

**Citizen Complaints**

- Development has established a Citizen Complaint Procedure accessible via its website.
- Complaints may be submitted in writing or via email.

- Development will respond to all complaints within 15 business days.
- Appeals of eligibility or award determinations will follow the formal appeals process described in the section describing the Administration of this grant and will be further outlined in published policies and procedures.
- Records of complaints and resolutions will be maintained and made available to HUD upon request.

## Anti-Displacement

Development is committed to minimizing displacement of residents as a result of CDBG-DR activities and ensuring full compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended (49 CFR Part 24), and Section 104(d) of the Housing and Community Development Act of 1974.

### Minimizing Displacement

- All programs are designed to avoid or minimize involuntary displacement.
- Activities such as demolition and clearance will be limited to properties that are beyond repair and pose health and safety hazards, as documented in the disaster damage assessment.
- Infrastructure projects will primarily involve extensions and upgrades to existing systems, not acquisitions that require household displacement.
- Replacement housing programs will prioritize on-site reconstruction where feasible to allow households to remain in their communities.

### Relocation Assistance

If displacement is unavoidable, affected households will be provided with relocation assistance in accordance with URA and Section 104(d):

- Relocation payments for moving expenses and increased housing costs.
- Advisory services to ensure displaced persons are informed of their rights and available housing options.
- Comparable replacement housing will be offered to displaced households prior to displacement.

### One-for-One Replacement

Development will comply with Section 104(d) one-for-one replacement requirements for any occupied, low- and moderate-income (LMI) units demolished or converted to non-housing use.

- Replacement units will be:

- Provided within a reasonable period of time;
- Comparable in size, features, and location to the units lost; and
- Affordable to the same income groups previously served.
- Replacement housing opportunities will be integrated into the Single-Family Replacement Program and the Multifamily Rental Development Program as applicable.

### **Public Notice and Transparency**

- Development will publish a Residential Anti-Displacement and Relocation Assistance Plan (RARAP) as a stand-alone policy, accessible on the program website.
- Notices of displacement or relocation assistance will be provided in plain language.
- Reasonable accommodations will be offered to persons with disabilities.

### **Connection to Public Comments**

Development has incorporated explicit anti-displacement protections into this Action Plan. The multifamily rental housing program will prioritize displaced LMI households, and the demolition program ensures that property owners retain ownership rights to cleared parcels, reducing financial barriers and supporting in-place recovery.

## **Waivers**

HUD has provided certain statutory and regulatory waivers and alternative requirements through the 2025 CDBG-DR Universal Notice (90 FR 1754, 90 FR 4759, 90 FR 4760). These waivers are intended to expedite recovery, reduce administrative burden, and account for the unique circumstances of disaster recovery programs.

Development may implement the following waivers as applicable and if necessary to Logan County's CDBG-DR program:

### **One-for-One Replacement Waiver**

- **Waived Requirement:** Section 104(d)(2)(A)(i) and (ii) of the Housing and Community Development Act, and 24 CFR 42.375, requiring one-for-one replacement of all lower-income units demolished or converted.
- **Alternative Requirement:** One-for-one replacement is not required for disaster-damaged units determined to be “not suitable for rehabilitation” as defined by Ohio’s damage assessment methodology (rehabilitation costs exceed reasonable project cap or pose unresolved health/safety hazards).
- **Application in Ohio:** Applies to the 37 tornado-damaged properties identified for demolition by the Logan County Land Bank. Replacement obligations will not be triggered for units deemed not feasible to repair. However, Development remains committed to

providing affordable replacement housing through the Single-Family and Multifamily Housing Programs.

#### Duplication of Benefits (DOB) Flexibilities

- **Waived Requirement:** Standard duplication of benefits calculation timing under Section 312 of the Stafford Act.
- **Alternative Requirement:** Grantees may implement DOB policies that allow assistance to flow more quickly while reserving rights to recapture funds if additional benefits (e.g., insurance, FEMA, SBA) are later received.
- **Application in Ohio:** Development may apply DOB flexibilities to expedite awards to households and projects, while requiring ongoing verification and recapture provisions to ensure compliance.

#### Environmental Review Streamlining

- **Waived Requirement:** Certain provisions of 24 CFR Part 58 for categorical exclusions and tiered reviews.
- **Alternative Requirement:** Allows for tiered environmental reviews and expedited categorical exclusions to accelerate project start-up.
- **Application in Ohio:** Development may use tiered reviews for projects to streamline compliance while ensuring all federal environmental protections remain in place.

#### Procurement Flexibilities

- **Waived Requirement:** State and local procurement rules that may be more restrictive than federal requirements.
- **Alternative Requirement:** Grantees may follow 2 CFR 200.317–200.327 procurement standards in place of state requirements, provided conflicts of interest are addressed and cost reasonableness is documented.
- **Application in Ohio:** The Logan County Board of Commissioners will follow federal procurement standards for infrastructure projects, allowing efficient RFP processes while maintaining compliance.

#### Pre-Award Cost Eligibility

- **Waived Requirement:** Standard prohibition on incurring costs prior to HUD grant agreement execution.
- **Alternative Requirement:** Reasonable pre-award costs may be reimbursed if tied to eligible activities and undertaken at grantee risk.
- **Application in Ohio:** Development may reimburse eligible pre-award costs for planning, damage assessment, and early program design activities initiated after the March 2024 tornadoes.

## Transparency and Public Notice

- All waivers and alternative requirements will be published on Development's program website for public transparency.
- Development will ensure that waivers are applied consistently and documented in project files for HUD monitoring.

## Modifications to the Action Plan

HUD requires grantees to establish and describe procedures for modifying the Action Plan after approval. Development will ensure that any modifications are carried out in a transparent, consistent, and HUD-compliant manner.

### **Substantial Amendments**

A **substantial amendment** will be required when:

- A change in program benefit, eligibility criteria, or allocation priorities significantly modifies the purpose, scope, or beneficiaries of an activity;
- The addition or deletion of an activity is proposed; or
- The reallocation of more than 10% of the total grant amount is proposed between program categories (e.g., housing, infrastructure, demolition, administration).

### **Process for Substantial Amendments:**

- Development will publish the proposed amendment on its website
- A 30-day public comment period will be provided.
- At least one public hearing will be held with consideration to the impacted community.
- All comments received will be summarized, with responses included in the final submission to HUD.
- The amendment will be submitted to HUD through DRGR for approval prior to implementation.

### **Non-Substantial Amendments**

Non-substantial amendments include:

- Reallocation of less than 10% of the total grant between programs;
- Changes that do not alter program eligibility, purpose, or national objectives;
- Administrative updates such as correcting clerical errors, updating contact information, or refining program descriptions for clarity.

### **Process for Non-Substantial Amendments:**

- Development will post the amendment on its website with a brief explanation.
- No formal public comment period will be required.
- HUD will be notified through DRGR as part of quarterly reporting.

#### **Public Access to Amendments**

- All amendments (substantial or non-substantial) will be posted on Development's program website.
- Summaries will be provided in plain language and available in accessible formats for persons with disabilities.
- Historical versions of the Action Plan will be archived online to ensure public transparency.

#### **HUD Review and Approval**

- Substantial amendments will be effective only after HUD approval.
- Non-substantial amendments will be considered effective upon posting, with HUD notified through routine reporting.

## **Performance Reports**

HUD requires grantees to report regularly on the use of CDBG-DR funds, including progress toward program outcomes, expenditures, and compliance with national objectives. Development will ensure that all reporting is accurate, timely, and publicly accessible.

#### **Quarterly Performance Reports (QPRs)**

- Development will submit Quarterly Performance Reports (QPRs) through DRGR no later than 30 days after the end of each calendar quarter.
- Each QPR will include:
  - Obligations and expenditures by program and activity;
  - Performance measures such as housing units constructed, demolished, or rehabilitated; infrastructure improvements completed; and households served;
  - National objective compliance (LMI benefit, slum/blight elimination, urgent need);
  - Program-specific outputs (e.g., number of rental units created, linear feet of water/sewer line installed);
  - Leveraged funds from LIHTC, FEMA, SBA, insurance, or other sources;
  - Progress on mitigation activities supported with the MIT set-aside;
  - Administrative and planning costs, not to exceed statutory caps.

### **DRGR Data Management**

- A dedicated grants management system will serve as the central platform for collecting and verifying subrecipient and contractor data.
- Data from this system will be used to support data entry into DRGR to ensure consistency across systems.
- Subrecipients will be required to enter project-level data into a dedicated grants management system of Development's determination, and will be subject to review by Development for accuracy and completeness.

### **Public Transparency**

- All QPRs submitted to HUD will be posted on Development's program website within five business days of HUD approval.
- Reports will be published in plain language summaries and ADA-compliant formats available on request.
- Archived QPRs will remain accessible online for the duration of the grant.

### **Monitoring and Accountability**

- Development will cross-check reported outputs against site inspections, financial documentation, and beneficiary files to ensure accuracy.
- Discrepancies will be investigated promptly, and corrective actions will be documented in DRGR.
- Performance data will be reviewed quarterly, at a minimum, by senior management to assess progress toward recovery goals and HUD compliance.