

The background of the entire page is a photograph of a Chicago neighborhood. In the foreground, there are several multi-story brick residential buildings with multiple windows. Behind these buildings, a dense line of green trees is visible. In the far background, the Chicago skyline is visible under a clear sky, with the Willis Tower being the most prominent building.

2025

Community Development Block Grant Program

Disaster Recovery (*CDBG-DR*)

DRAFT ACTION PLAN



Table of Contents

| | | |
|-------|---|----|
| 1 | EXECUTIVE SUMMARY | 3 |
| 1.1 | Overview | 3 |
| 1.2 | Disaster-Specific Overview | 4 |
| 1.2.1 | FEMA DR-4728-IL | 5 |
| 1.2.2 | FEMA DR-4749-IL | 5 |
| 1.2.3 | FEMA DR-4819-IL | 6 |
| 1.2.4 | Disaster Impact Summary | 7 |
| 1.2.5 | Most Impacted and Distressed Areas | 10 |
| 1.2.6 | Unmet Needs and Mitigation Needs Summary | 14 |
| 2 | UNMET NEEDS ASSESSMENT | 17 |
| 2.1 | Methodology..... | 17 |
| 2.1.1 | Data Sources..... | 18 |
| 2.1.2 | Data Limitations | 18 |
| 2.2 | Housing Unmet Needs Assessment..... | 21 |
| 2.2.1 | Summary of Unmet Housing Needs | 21 |
| 2.2.2 | Rental and Owner-Occupied Single Family and Multifamily Housing | 22 |
| 2.2.3 | Emergency Shelters, Interim, and Permanent Housing..... | 35 |
| 2.2.4 | Public Housing and Other Affordable Housing..... | 36 |
| 2.3 | Infrastructure Unmet Needs Assessment..... | 38 |
| 2.3.1 | Summary of Unmet Infrastructure Needs | 38 |
| 2.3.2 | Stormwater Infrastructure | 40 |
| 2.4 | Economic Revitalization Unmet Needs Assessment | 50 |
| 2.4.1 | Summary of Unmet Economic Revitalization Needs..... | 50 |
| 2.4.2 | Economic Revitalization Analysis | 50 |
| 2.5 | Mitigation Needs Assessment..... | 53 |
| 2.5.1 | Urban Flooding Risk Analysis | 55 |
| 2.5.2 | Mitigation Priorities | 58 |
| 2.5.3 | Summary of Unmet Mitigation Needs | 60 |

| | | |
|-------|---|----|
| 3 | PROPOSED USE OF FUNDS..... | 61 |
| 3.1 | Allocation and Award Caps | 62 |
| 3.1.1 | Eligible and Ineligible Activities | 63 |
| 3.1.2 | CDBG-DR Program National Objectives | 64 |
| 3.1.3 | Low-to-Moderate Income Expenditure Requirement..... | 64 |
| 3.1.4 | Obligation and Expenditure of Funds | 64 |
| 3.2 | Connection to Unmet Need | 66 |
| 3.3 | Program Details | 69 |
| 3.3.1 | Administration | 69 |
| 3.3.2 | Planning | 69 |
| 3.3.3 | Housing | 69 |
| 3.3.4 | Infrastructure and Mitigation Program..... | 69 |
| 3.3.5 | Economic Revitalization | 74 |
| 3.3.6 | Public Services Programs..... | 74 |
| 4 | GENERAL REQUIREMENTS..... | 75 |
| 4.1 | Citizen Participation..... | 75 |
| 4.1.1 | Consultation of Developing the Action Plan | 76 |
| 4.1.2 | Public Notice & Comment | 77 |
| 4.1.3 | Public Hearings | 78 |
| 4.1.4 | Consideration of Public Comments..... | 79 |
| 4.1.5 | Citizen Complaints | 79 |
| 4.2 | Modifications to the Action Plan | 81 |
| 4.2.1 | Substantial Amendment | 81 |
| 4.2.2 | Non-Substantial Amendment | 81 |
| 4.3 | Performance Reports..... | 82 |
| 5 | APPENDIX | 83 |
| 5.1 | Certifications | 83 |
| 5.2 | Waivers | 86 |
| 5.3 | Summary of and Response to Public Comments..... | 87 |
| 5.4 | Standard Form 424 | 88 |

1 EXECUTIVE SUMMARY

1.1 Overview

The City of Chicago (“the City”) experienced Severe Storms and Flooding in 2023 and 2024 (FEMA DR-4728-IL, DR-4749-IL, DR-4819-IL). The City’s infrastructure systems failed to function by not effectively draining the flood water. As a result, the flood water backed up into buildings, causing damage to a large portion of the City’s housing stock. This damage concentrated on the West Side, in Wards 28, 29, 30, and 37, where the storm water must travel some of the longest distances in the City’s system (up to six miles) to drain. The U.S. Department of Housing and Urban Development (HUD) announced on January 16, 2025 that the City will receive \$426,608,000 in funding to support long-term recovery efforts from the flooding. This plan details the most cost-effective strategy to invest these federal funds in infrastructure in support of housing, to prevent system failures from damaging homes again during future storms.

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 \$426,608,000 in CDBG-DR funds to the City of Chicago in response to Severe Storms and Flooding in 2023 and 2024 (FEMA DR-4728-IL, DR-4749-IL, DR-4819-IL) through the publication of the Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice (UN AAN) (90 FR 4759).¹ This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 (Public Law 118-158).² The City has developed this draft action plan in accordance with the Updated Universal Notice following Memorandums 2025-02 and 2025-03 on March 19, 2025 and April 5, 2025.³

¹[Federal Register: Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice \(UN AAN\)](#) Federal Register 2025.

² [Further Continuing Appropriations and Disaster Relief Supplemental Appropriations Act, 2025](#) House Committee on Appropriations 2025.

³ [HUD Memorandum 2025-02](#) HUD 2025.

1.2 Disaster-Specific Overview

Located in the Midwest, the City of Chicago is susceptible to a host of extreme weather events such as heatwaves, blizzards, severe thunderstorms, tornadoes, and flooding. Starting in the summer of 2023, a series of severe storms highlighted the growing threat of extreme rainfall and urban flooding, particularly in residential areas. Chicago's infrastructure is designed to handle up to 2 inches of rain within a 24-hour period, a benchmark exceeded twice in less than 6 months.⁴ From June 29th - July 2nd (FEMA DR-4728-IL), peak rainfall value of an estimated 9.1 inches occurred near the border of Chicago, Cicero, and Oak Park. This was followed by flash flooding on September 17th - 18th (FEMA DR-4749-IL), where the peak rainfall value was estimated at 8.7 inches. The following summer, from July 13th - July 16th, 2024 (FEMA DR-4819-IL), severe thunderstorms brought destructive winds, power outages, downed trees, and flash flooding to the City.



Figure 1: Vehicles Trapped in Viaduct

⁴ [Climate Change Connections: Illinois \(Chicago's Waterway System\)](#) US EPA 2025.

1.2.1 FEMA DR-4728-IL

Between June 29th and July 2nd, 2023, the City experienced heavy rainfall brought on by multiple nearly stationary cells of showers and thunderstorms. During the periods of heaviest rainfall, the individual showers and storms moved very little, leading to peak rainfall of up to 9.1 inches in certain areas.⁵ This incredibly heavy rainfall caused flooding in neighborhoods and filled the deep tunnel and McCook Reservoir, leading to a combined sewer overflow event on the Chicago River and a significant river rise. Between the major disaster declaration issued on August 15th, 2023, and November 21st, 2023, the Federal Emergency Management Agency (FEMA) approved 74,876 applications for individual assistance, and the flood damage was initially estimated to be around \$500 million.⁶

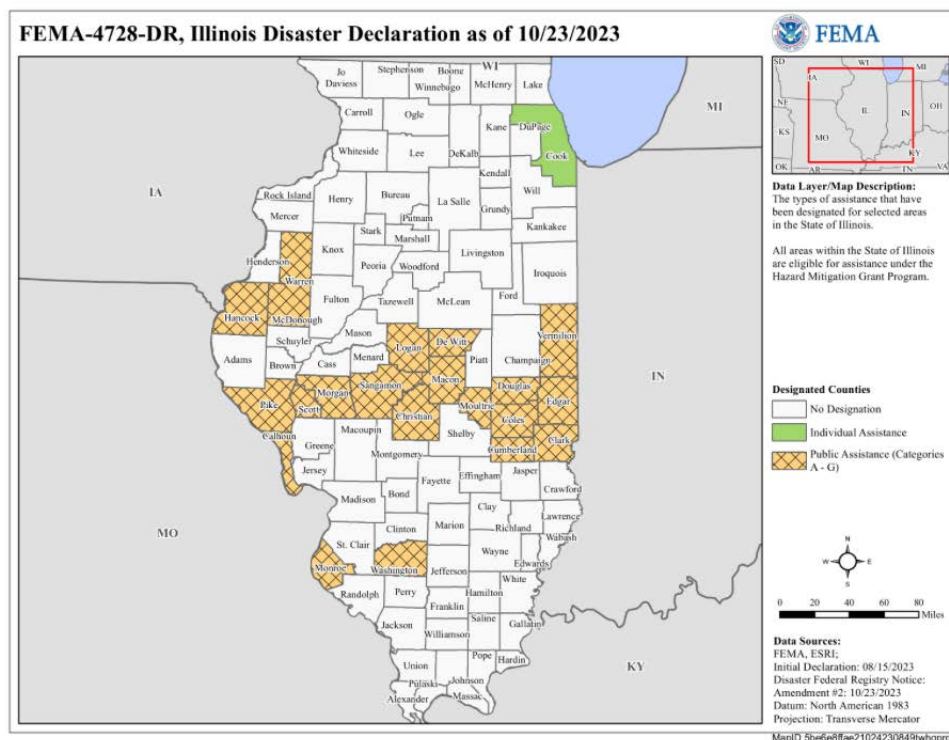


Figure 2: FEMA-4728-DR Assistance Map

1.2.2 FEMA DR-4749-IL

From September 17th – 18th, 2023, a slow-moving low pressure storm system moved across the City of Chicago and produced pockets of very heavy rainfall. A large pocket of heavy rainfall fell over the south suburbs of Chicago and remained stationary for

⁵ [Record-setting rainfall in Chicago area leaves over 7,000 without power](#) Chicago Sun-Times 2023.

⁶ [Disaster Public Notice: FEMA-4728-DR-IL](#) FEMA 2023.

several hours, leading to an estimated peak rainfall of 8.7 inches.⁷ This rainfall caused hundreds of homes to experience storm-induced flooding, compounding damage from earlier in the summer during DR-4728-IL. With a total of 1,545 residences impacted, the storm was declared a major disaster on November 20, 2023.⁸

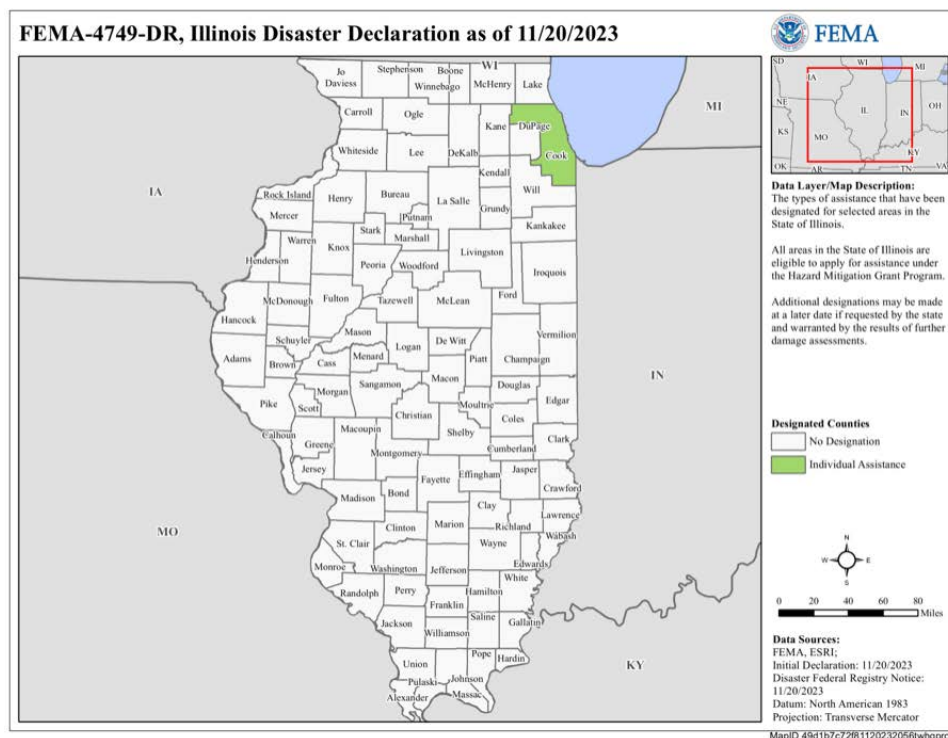


Figure 3: FEMA-4749-DR Assistance Map

1.2.3 FEMA DR-4819-IL

In July 2024, a storm system moved across the City consisting of severe winds which disrupted power lines and downed trees, leading to road closures.⁹ The storm system produced a total of four tornadoes within City limits. Severe straight-line winds caused damage to private and public infrastructure across both the City and in Cook County. Storm systems as strong as the system observed in July 2024 have an occurrence interval of once every five to ten years. The storm was declared a major disaster on September 20th, 2024.¹⁰

⁷ [The July 2 and September 17, 2023, Flash Flood Events in the Chicago Metro Area](#) National Weather Service 2023.

⁸ [Disaster Public Notice: FEMA-4749-DR-IL](#) FEMA Disaster Notice 2023.

⁹ [Widespread damage after multiple tornadoes reported in Chicago metro area](#) CBS Chicago 2024.

¹⁰ [Disaster Public Notice: FEMA-4819-DR-IL](#) FEMA Disaster Notice 2024.

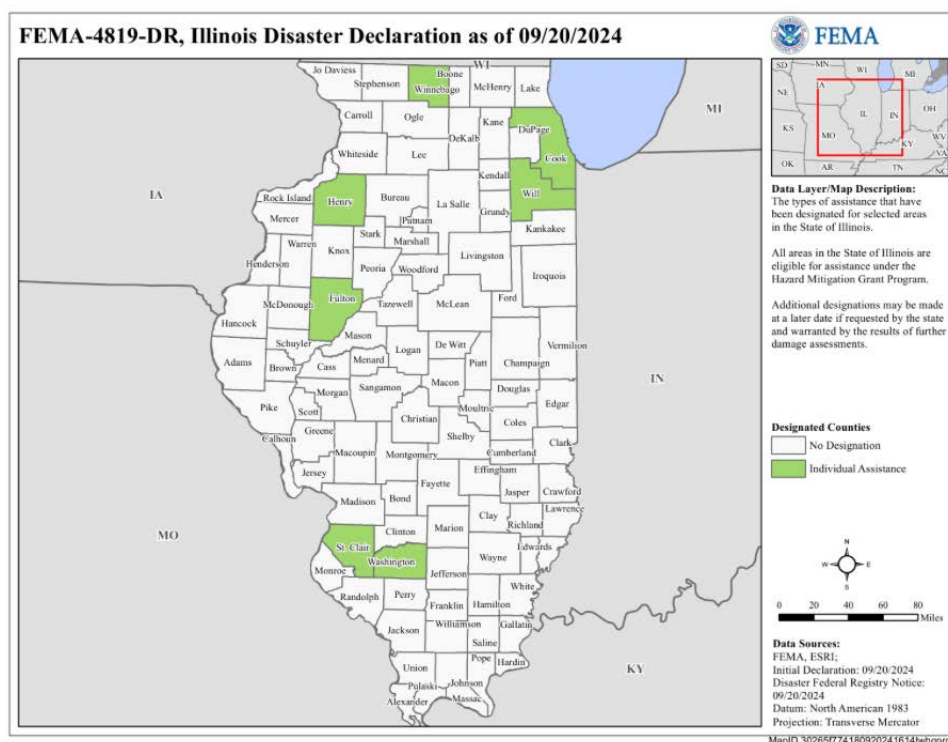


Figure 4: FEMA-4819-DR Assistance Map

1.2.4 Disaster Impact Summary

The National Weather Service (NWS) estimated peak rainfall reached 9.1 inches near the northern Cicero and western Chicago border between June 29th and July 2nd, 2023. Chicago's Department of Water Management (DWM) Chief Sewer Engineer reported to Chicago's Office of Emergency Management (OEMC) that this was the largest 12-hour rainfall amount in almost 40 years, surpassing the storm events of August 13th – 14th, 1987.¹¹ Despite mitigation efforts, such as opening lake and river locks, the City's infrastructure was unable to manage the excessive volume of water. In the days following the heavy rainfall, 12,816 calls were placed to 311 reporting storm-induced impacts. 8,170 of those calls reported water in the basement, while 276 of the water in the basement calls reported water reaching the first floor of the homes.¹²

According to the Metropolitan Water Reclamation District of Greater Chicago (MWRD), the July 2023 storms (DR-4728-IL) alone filled one of three reservoirs in its system with nearly five billion gallons of runoff, which have a combined capacity of 15.15 billion

¹¹ [20th anniversary of Chicago's Aug. 13-14, 1987, benchmark rain event](#) Chicago Tribune 2021.

¹² [311 Service Requests - Point Map](#) 311 Chicago Data Portal 2025.

gallons.¹³ Though MWRD continues to work to increase reservoir capacity, it is incredibly rare to experience enough rainfall to completely fill one of these reservoirs. The severity of the storm also caused the Chicago River to rise by 6 feet, forcing MWRD to reverse water flow into Lake Michigan to prevent more severe flooding.¹⁴ The Executive Director of Cook County Department of Emergency Management and Regional Security (CCDEMRS) noted¹⁵ that “this storm was significant, upwards of a once-every-500-year-type flooding event.”

A preliminary damage assessment after the storm of July 2023 was conducted by teams comprised of representatives from FEMA, the Illinois Emergency Management Agency (IEMA), CCDEMRS, and OEMC to determine if the damage met the criteria to submit to the President of the United States to formally request direct assistance for individuals. This assessment found that of 1,458 Chicago structures that were assessed, 1,318 (90.4%) of these structures sustained some amount of damage, from minor effects to complete destruction.¹⁶

The storm events of September 17th – 18th, 2023, were brought on by a slow-moving low-pressure system and resulted in 4 to 6 inches of rain across the City, up to eight times the rainfall of a typical storm.¹⁷ This amount of rainwater is far beyond the capacity of Chicago’s infrastructure, which is designed to handle up to 2 inches of rain within a 24-hour period.¹⁸ This large amount of rainfall, combined with the lasting effects of the storms observed in July, resulted in flash flooding in several communities.

Some images collected by news reports and aerial documentation during and after the storms and flash flooding showed neighborhoods with submerged roadways and many homes surrounded by water. With an additional 6 inches of overflow, the system’s capacity was insufficient, resulting in severe sewer overflows, health hazards from contaminated floodwaters, and significant strain on sewer pipes.¹⁹

¹³ [TARP Fact Sheet](#) Metropolitan Water Reclamation District of Greater Chicago 2025.

¹⁴ [July 2-3, 2023, Storm Follow-Up](#) Metropolitan Water Reclamation District of Greater Chicago 2023.

¹⁵ [Costly Deep Tunnel flooding project can’t handle Chicago area’s severe storms fueled by climate change](#) Chicago Tribune 2023.

¹⁶ [Individuals and Households Program - Valid Registrations](#) FEMA 2025.

¹⁷ [U.S. Climate Normals](#) National Oceanic and Atmospheric Administration 2025.

¹⁸ [Climate Change Connections: Illinois \(Chicago's Waterway System\)](#) US EPA 2025.

¹⁹ [Sanitary Sewer Overflows \(SSOs\)](#) US EPA 2025.



Figure 5: Flooded Street

After the storm events of July 2024, damage assessments performed in Chicago found that approximately 95,603 buildings sustained damage, about 7.4% of all buildings in the City.²⁰ While the impact of the storms was felt throughout the City, the areas predominately impacted were neighborhoods on the Northwest, West, and Southwest sides. As a result, the Presidential Disaster Declaration designated the City of Chicago and Cook County eligible for FEMA Individual Assistance Programs.

In addition to the immediate response to the storms of 2023 (FEMA DR-4728-IL and FEMA DR-4749-IL), the City and the U.S. Army Corps of Engineers convened with Long-Term Recovery Groups (LTRGs) which focused on enhancing resiliency in the most impacted parts of the City. The City held workshops on September 25th and October 1st, 2024, which discussed efforts to enhance flood resilience on the City's South and West Sides as well as Cook County's south and west suburbs. These LTRGs included the South Suburban Recovery Group, Southside Resilience and Recovery Coalition, and the West Side Long Term Recovery Group. The workshops also included representatives from FEMA, IEMA, CCDEMRS, MWRD, OEMC, and DWM. The core focus of the workshops was a review of the efforts of the LTRG's and long-term solutions for

²⁰ [Housing Assistance Program Data - Owners](#) FEMA 2025.

creating flood-resilient communities through evaluating property damages, coordinating cleanup efforts, and securing long-term funding for recovery.

1.2.5 Most Impacted and Distressed Areas

The Universal Notice (UN) identified the entire City of Chicago as the Most Impacted and Distressed (MID) area for this CDBG-DR allocation based on FEMA's assessment of disaster impact and recovery needs. In compliance with HUD's directive to spend CDBG-DR funds within MID areas, the City will spend its funds within City boundaries with particular focus on the areas within the City that experienced the greatest levels of damage.

Within the City of Chicago, while impacts from severe storms, winds, and flooding were experienced by residents from all 50 wards, there was a disproportionate impact in select wards. After addressing immediate needs such as street clearing, removal of downed trees, and distributing flood clean-up kits in the days following the storms, the City gathered additional information and reviewed the disasters' impacts to identify the areas with the greatest need for repair and recovery investment. This assessment indicated that storm impacts were concentrated on the City's West Side, in wards 28, 29, 30, and 37. These wards primarily encompass the communities of Austin, Belmont Cragin, East and West Garfield Park, and Humboldt Park — areas that are predominantly residential and home to individuals and families with low to moderate incomes.

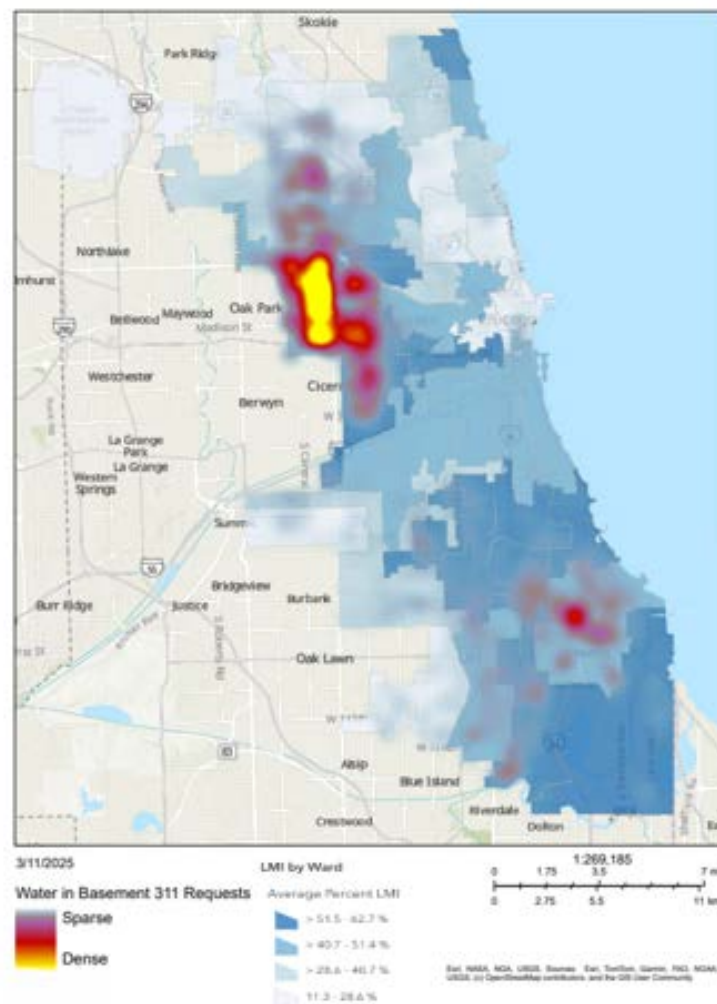


Figure 6: Map of Chicago wards shaded by LMI overlaid by water in basement 311 calls.

Further analysis, in alignment with the CDBG-DR directive to spend at least 70% of funds in Low- and Moderate-Income (LMI) areas,²¹ compared the distribution of flood damage such as flooded basements, backed-up sewers, and damaged or inaccessible roadways, against predominantly LMI areas in **Figure 7**.

²¹ [Low to Moderate Income Population by Block Group](#) HUD GIS Helpdesk 2025.

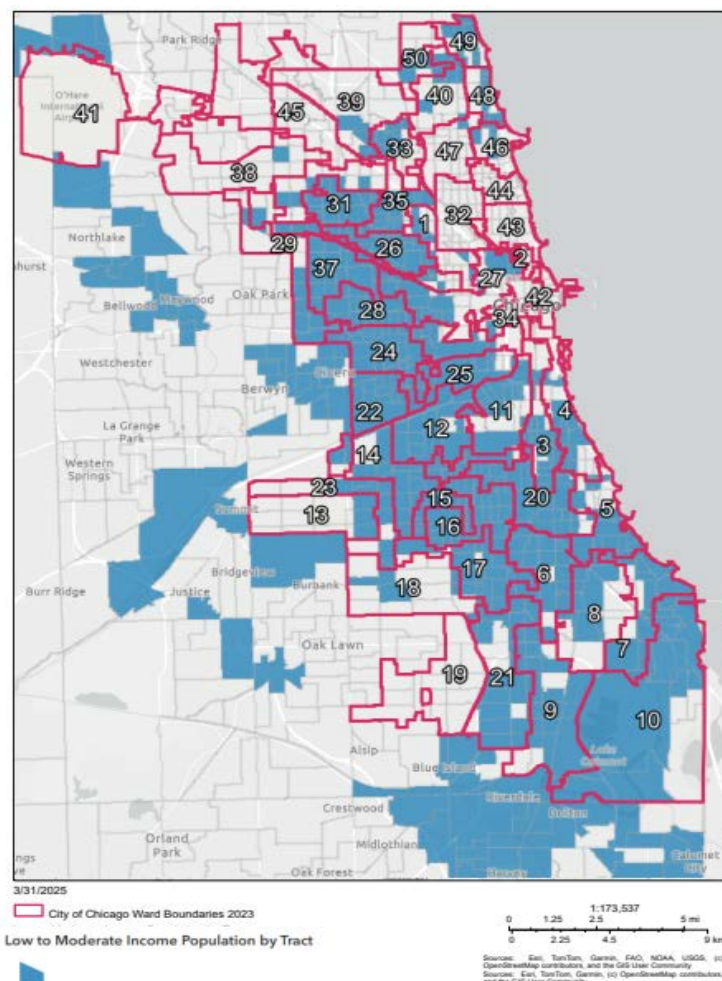


Figure 7: Map of LMI areas by census tract overlaid by ward boundaries.

The wards with the highest levels of flood damage (28, 29, 30, 37) also have concentrated areas of poverty and high housing costs²² exacerbated by aging housing stock in communities within and across ward boundaries, as shown in **Table 1**.

²² [Housing Market Indicators Data Portal](#) DePaul University Institute for Housing Studies 2025.

Table 1: West Side Wards by LMI and Income

| Community Area | Ward | Average Median Household Income | Percent of LMI households in community area | Share of Households that are Cost-Burdened | Median year housing was built |
|--------------------|------------|---------------------------------|---|--|-------------------------------|
| West Garfield Park | 28 | \$36.5k | 78% | 63.8% | 1938 |
| East Garfield Park | 28 | \$38.5k | 77% | 58% | 1944 |
| Humboldt Park | 37 | \$54.9k | 72% | 49.0% | 1931 |
| Austin | 28, 29, 37 | \$51.9k | 64% | 55.2% | 1939 |
| Belmont Cragin | 30 | \$67.7k | 60% | 46.5% | 1936 |
| City-wide Average | All wards | \$72.6k | 53% | 39.3% | 1952 |

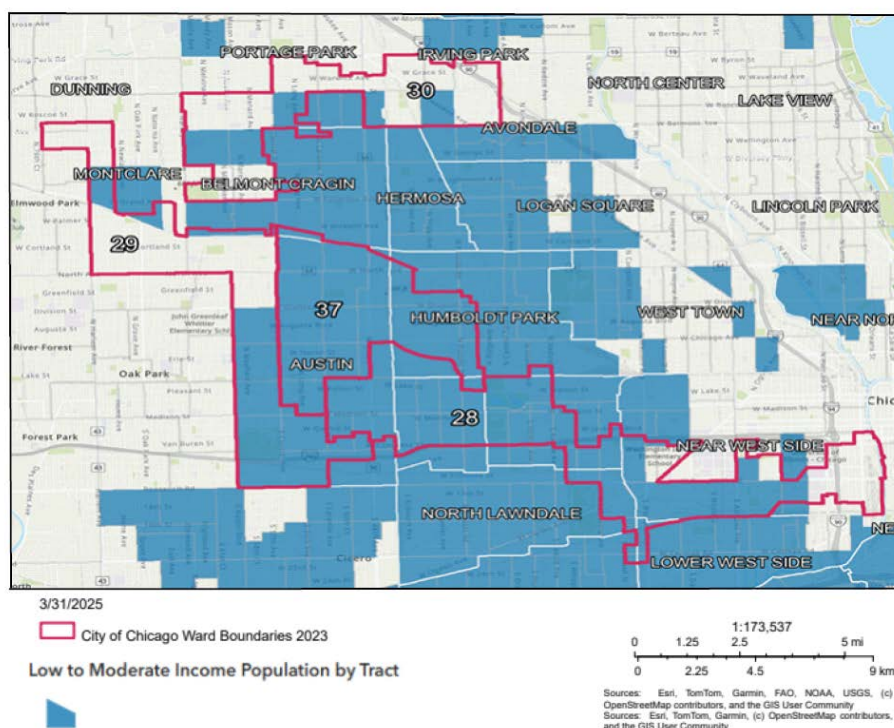


Figure 8: Census Tracts with > 50% LMI shown in blue with wards 28, 29, 30, 37 outlined in red.

To reflect the distribution of damage and ensure recovery efforts are targeted towards the most impacted individuals and communities, the City of Chicago is prioritizing investments in West Side wards 28, 29, 30, and 37. CDBG-DR-funded projects will prioritize investments in these areas to resolve disproportionate vulnerability to urban flooding and protect these residents and their homes from future disasters.

1.2.6 Unmet Needs and Mitigation Needs Summary

Following guidance from HUD's Universal Notice, the City of Chicago's Unmet Needs Assessment analyzes available data to calculate cumulative unmet needs across housing, infrastructure, and economic revitalization sectors. An unmet need is defined as any remaining need that is not met by insurance, local funding, or other federal funding programs. The assessment utilizes data from various sources, including FEMA,²³ the National Flood Insurance Program (NFIP),²⁴ the City of Chicago's Data Portal,²⁵ Chicago's OEMC,²⁶ Unemployment Insurance,²⁷ the U.S. Census Bureau,²⁸ and the Cook County Multi-Jurisdictional Hazard Mitigation Plan (MJ-HMP).²⁹ Further detail regarding the methodology and data leveraged is available in **Section 2.1**.

Recent severe storms (FEMA DR-4728-IL, DR-4749-IL, DR-4819-IL) in the summers of 2023 and 2024 caused widespread flooding and storm-related damage throughout the City. In 2023, a stalled storm system over the City dropped up to 9.1 inches of rain from June 29th - July 2nd, followed by a slow-moving storm system on September 17th – 18th that dropped an additional 6 inches of rain in certain parts of the City. A year later, from July 13th - July 16th, 2024, severe thunderstorms brought destructive winds, power outages, downed trees, and significant flash flooding. The July 2024 storm damaged power infrastructure, causing service outages even more widespread than the prior summer. This storm also affected water treatment facilities and interrupted communication as towers and phone lines were damaged by straight-line winds.

While the immediate effects of severe weather were mitigated by the City's emergency response, allowing most economic activity to resume with relatively low long-term impact, the storms damaged residential homes and small businesses in cost-burdened neighborhoods and exacerbated deficiencies in the City's infrastructure, particularly on the West Side in wards 28, 29, 30, and 37. The long-term damage from these storms was largely caused by the current state of Chicago's sewer infrastructure, much of which was in need of upgrades to meet modern standards even before these storms. The City of Chicago has a combined sewer system, where wastewater and stormwater flow through the same pipes. These severe storms overwhelmed Chicago's sewer grid, causing extensive street and basement flooding and damage to water treatment

²³ [OpenFEMA Data Sets - Chicago Individual and Public Assistance](#) FEMA 2025.

²⁴ [FEMA NFIP Redacted Claims](#) FEMA 2025.

²⁵ [311 Service Requests - Point Map](#) 311 Chicago Data Portal 2025.

²⁶ [City of Chicago: Office of Emergency Management](#) Chicago OEMC 2025.

²⁷ [Unemployment Insurance Data, Employment & Training Administration \(ETA\)](#) US DOL Unemployment Data Chicago 2025.

²⁸ [Census Datasets](#) US Census Data Chicago 2025.

²⁹ [Cook County Hazard Mitigation Plan Updates](#) Cook County DEMRS 2025.

facilities in addition to damaged powerlines and substations causing widespread outages. Due to the City's combined sewer system, backups mean houses, basements, and streets can be flooded with wastewater, potentially leading to health risks due to harmful bacteria in sewage backup.

In the aftermath of these storms, there were significant increases in flood-related complaints. The storms of July 2023 brought in 1,870 flood-related complaints, September 2023 storms brought in 251 flood-related complaints, and the July 2024 storms brought in 9,699 storm-related complaints.³⁰ MWRD also announced that Tuesday, July 11th, 2023, was an "Overflow Action Day", which called upon residents to reduce water usage by delaying showers and baths, flush less frequently, and wait to run the dishwasher or washing machine. Some residents reported even nine days after the initial storm in July 2023 that their houses were still underwater.³¹ The damage and public response from these storms underscore the critical need for extensive infrastructural upgrades to help mitigate damage from future storms.

To help mitigate future damages like those described above, the Mitigation Needs Assessment identifies urban flooding as Chicago's most significant risk, with severe storms and high winds also posing threats. While repairing the ongoing damage caused from past severe storms is important, mitigating the potential for urban flooding through infrastructure investments is the most effective way to ensure the safety of homes, businesses, and community spaces. In recent years, the City, in coordination with MWRD, has undertaken key mitigation projects to improve its ability to handle severe weather impacts, including expanding the Permeable Alley Program and permeable public spaces, in addition to regular maintenance of over 5,000 miles of sewers. The MWRD has also expanded the Tunnel and Reservoir Plan (TARP). These projects and several more are discussed in the Cook County MJ-HMP, outlining proactive strategies to improve the City's ability to handle more frequent and more severe storms and flooding.

Table 2 below provides an overview of the remaining unmet need from each category, as well as the corresponding program allocation from the City's CDBG-DR allocation. The City has assessed the data available to it at the time of this Action Plan; as additional data becomes available, the City will continue to incorporate data into its unmet needs assessments to ensure comprehensiveness.

³⁰ [311 Service Requests - Point Map](#) 311 Chicago Data Portal 2025

³¹ [Chicago Flooding 2023: Cook County disaster proclamation issued as West Side, west suburban residents call for answers](#) ABC7 Chicago 2023.

Table 2: Total Unmet Need and Allocation Overview

| Eligible Cost Category | Unmet Need | % of Unmet Need | % of Funding to be Expended in MID | CDBG-DR Allocation Amount | % of CDBG-DR Allocation | Local Funding |
|--------------------------------|----------------------|-----------------|------------------------------------|---------------------------|-------------------------|---------------------|
| Administration (5% cap) | \$- | -% | -% | \$21,330,400 | 5% | \$- |
| Planning (15% cap) | \$- | -% | -% | \$- | -% | \$- |
| Housing | \$34,217,895 | 4% | -% | \$- | -% | \$40,000,000 |
| Infrastructure | \$919,462,768 | 94% | 100% | \$405,277,600 | 95% | \$52,013,087* |
| Economic Revitalization | \$16,664,481 | 2% | -% | \$- | -% | \$5,000,000 |
| Public Services | N/A | -% | -% | \$- | -% | \$- |
| Total | \$970,345,144 | 100% | 100% | \$426,608,000 | 100% | \$97,013,087 |

*Funding earmarked from City capital funds and other local partners depends on project locations, project eligibility, and funding availability

2 UNMET NEEDS ASSESSMENT

As required by HUD, this section will present an evaluation of the three core aspects of recovery for the City of Chicago: housing, infrastructure, and the economy. These three areas have been identified by HUD as crucial for recovery and revitalization after disaster. Following these core areas, the City will review its mitigation needs within a risk-informed framework of the most common natural disasters facing the Chicagoland region.

In summary, the City's unmet need is greatest in the infrastructure category at \$919M, or 94% of its total unmet need, followed by housing at \$34M and economic revitalization at \$16M, together representing 6% of unmet need.

Table 3: Unmet Needs Summary

| Sector | Impact | Assistance | Unmet Need | % of Unmet Need |
|----------------|-------------------------|-----------------------|-----------------------|-----------------|
| Housing | \$ 243,309,313 | \$ 209,091,418 | \$ 34,217,895 | 4% |
| Economy | \$ 31,816,589 | \$ 15,152,108 | \$ 16,664,481 | 2% |
| Infrastructure | \$ 919,462,768 | \$ - | \$ 919,462,768 | 94% |
| | \$ 1,194,588,670 | \$ 224,243,526 | \$ 970,345,144 | 100% |

2.1 Methodology

Unmet needs are calculated for each of the HUD-defined sectors (housing, infrastructure, economic revitalization) based on guidance provided by HUD in its Federal Register Notice published on January 8, 2025 ("Universal Notice") (UN) and Federal Register Allocation Announcement Notice published on January 16, 2025 (UN AAN).

In the context of disaster recovery, HUD defines "unmet needs" as needs not covered by other sources such as insurance, local funds, or other federal programs. Any remaining need, after accounting for all support, represents the overall unmet need. Data was collected from various public data sources and provided by internal city departments. The results of this assessment are used to determine a baseline of unmet need by category that can be used as the basis for the creation of recovery programs.

2.1.1 Data Sources

Table 4: Data Sources

| Data | Source |
|--|--|
| Most Impacted and Distressed Area | <ul style="list-style-type: none"> • HUD |
| Housing Impact Data | <ul style="list-style-type: none"> • FEMA Individual and Household Assistance Program (IHP) • National Flood Insurance Program (NFIP) • Small Business Administration (SBA) Disaster Home Loans |
| Homelessness, Sheltered Populations | <ul style="list-style-type: none"> • City of Chicago Data Portal • Continuum of Care (CoC) Annual Housing Report |
| Infrastructure Impact Data | <ul style="list-style-type: none"> • Chicago Office of Emergency Management 311 non-emergency service line data • Department of Water Management GIS Data and additional DWM Analysis • Capital Improvement Planning Data |
| Economic Impact Data | <ul style="list-style-type: none"> • Unemployment Insurance • Small Business Association Disaster Business Loans |
| Low- and Moderate-Income Data | <ul style="list-style-type: none"> • HUD • US Census Bureau |
| Mitigation Data | <ul style="list-style-type: none"> • 2024 Cook County Multi-Jurisdictional Hazard Mitigation Plan |

2.1.2 Data Limitations

The City of Chicago has undertaken significant efforts to produce a comprehensive unmet needs assessment despite variable access to the required datasets. Recognizing the importance of this assessment in guiding the allocation of CDBG-DR funds, the City utilized best available and verifiable data sources, including FEMA IA, SBA, US Census, 311 reports and historical records, to identify the most pressing needs. The City of Chicago is committed to continuously improving its unmet needs assessment by actively coordinating with federal, state and local agencies, as well as other data providers, to obtain additional datasets. This ongoing effort aims to enhance the quality of the analysis and ensure that future assessments are based on the most comprehensive and up-to-date information available.

The following limitations are known at the time of this Action Plan publication:

- In evaluating housing unmet need, the City was able to access information regarding assistance provided by the FEMA Individual Assistance Program, National Flood Insurance Program, and SBA Disaster Home Loan Program. The data shared by SBA included information regarding private insurance payouts to homeowners who experienced disaster damage, however, this data was only available for Chicagoans that applied for SBA Disaster Home Loans. The City has not yet been able to obtain a more comprehensive summary of private insurance claims in response to these three disasters. The City is in contact with the State of Illinois Department of Insurance working to gather this information and will update the Unmet Needs Assessment when more data is received.
- The City did not receive a FEMA Public Assistance (PA) allocation in response to the federally declared disasters covered under this Action Plan. While the City was approved for FEMA Individual Assistance (IA) following each event, the threshold for PA—typically granted to support the repair or replacement of public infrastructure and the reimbursement of emergency response costs—was not met. As a result, the City did not receive federal funding through FEMA PA to support municipal recovery efforts such as debris removal, infrastructure repair, or emergency protective measures. This absence of FEMA PA funding has placed an increased burden on local resources and underscores the critical role of CDBG-DR funds in supporting the City's long-term recovery and infrastructure restoration efforts.
- 311 is the nonemergency hotline to report issues to the City of Chicago and its data is leveraged to assess infrastructure damage and unmet need. The City of Chicago's 311 data may not capture all storm-related issues, as 311 relies on residents to report problems. Some issues may go unreported, leading to an incomplete picture of the City's infrastructure needs. The data can be biased towards areas with higher engagement or awareness of the 311 system. This can result in underrepresentation of issues in less engaged communities in the infrastructure unmet needs assessment.
- Due to the recency of FEMA DR-4819-IL disaster (July 13th, 2024 to July 16th, 2024), the City is still assessing damages and support provided by FEMA and SBA assistance. Applications for FEMA Individual Assistance and SBA Disaster Loans were open until December 13th, 2024,³² and both agencies are continuing to process and review applications. The City will continue to receive updated information regarding approved applications which may result in adjustments to the housing and economic unmet needs estimates.

³² [Tomorrow is the Final Day to Apply for FEMA Assistance](#) FEMA 2024.

- The City has engaged Chicago's Continuum of Care³³ and local public housing authorities and is coordinating to receive data on emergency shelter occupancy and direct public housing impact in the specific timeframe of the storms.

DRAFT

³³ [Continuum of Care](#) All Chicago Making Homelessness History 2025.

2.2 Housing Unmet Needs Assessment

The recent damages to housing resulting from FEMA disasters DR-4819-IL, DR-4749-IL, and DR-4728-IL primarily consisted of basement flooding and utility damage due to the failure of the City's storm- and wastewater infrastructure to function. The flooding of residential basements during the disaster was not solely a housing issue—it was a direct consequence of infrastructure failure. The City's water management system was unable to handle the volume and intensity of stormwater, leading to widespread interior and basement flooding in homes. This event underscores the fundamental interdependence between housing and infrastructure:

- Housing resilience is not possible without functioning infrastructure. When systems designed to manage stormwater, sewage, and drainage fail, homes—especially those in vulnerable, low-lying areas—bear the brunt of the damage.

In this case, the inability of the stormwater infrastructure to perform its protective function translated into direct impact to households, property, and habitability. The relationship is clear:

- Infrastructure does not simply support housing—it enables it. Its failure to function directly impacts it.

The unmet need in housing cannot be fully understood or addressed without acknowledging the role of infrastructure systems in either protecting or compromising residential structures. This reinforces the urgent need for coordinated investments that address both sectors as part of the same housing ecosystem.

Consistent with the City's analysis in **Section 1.2.5**, the impacts of the storm were felt the most in West Side wards 28, 29, 30, and 37, due to aging housing stock and a high concentration of LMI households that have made the area particularly vulnerable to urban flooding and natural hazards.³⁴

The following section will address the impact that flooding from the 2023 and 2024 storms had on the City's housing to inform Chicago's recovery plan.

2.2.1 Summary of Unmet Housing Needs

As most residential properties, inclusive of single- and multi-family structures, sustained minimal damage and assistance has been rendered to those eligible that submitted

³⁴ [Without Affordable, Accessible, and Adequate Housing, Health Has No Foundation](#) National Library of Medicine Center 2023.

claims, residents have been able to recover from the majority of housing damage, leaving approximately \$34 million in unmet need from \$243 million in damages.

Table 5: Unmet Housing Need

| Damage Total | Assistance Total | Total (Net) Unmet Need |
|---------------|------------------|------------------------|
| \$243,309,313 | \$209,091,418 | \$34,217,895 |

While the City will continue to work with impacted homeowners to address damage incurred in the severe storms, long-term mitigation planning must address flood risk at the block or street level. The City's efforts to most efficiently and effectively protect homes and property via infrastructure improvements are detailed in **Section 3**.

The housing impacts from the 2023 and 2024 federally declared disasters were generally limited in scope due to the unique housing topography of the City and the availability of federal and local recovery resources. Chicago's residential areas—many of which are comprised of elevated structures and masonry construction—helped mitigate more severe structural damage typically associated with flood events. Most reported impacts were related to basement flooding rather than full structural loss, with FEMA inspections confirming that 94% of verified damages were classified as moderate and non-displacing. Additionally, substantial assistance was provided through FEMA Individual Assistance, SBA Disaster Loans, and insurance payouts, which together addressed the majority of repair and recovery needs.

With these resources in place, housing recovery efforts have largely met the scale of the need, leaving a relatively modest remaining unmet housing need. Given the scale of total damages and the concentration of long-term vulnerability in the City's infrastructure systems, the City has determined that housing recovery needs have largely been addressed and that CDBG-DR investments should prioritize infrastructure improvements to ensure long-term residential resilience.

2.2.2 Rental and Owner-Occupied Single Family and Multifamily Housing

Flooding from the storms primarily affected residential neighborhoods, with most of the damage caused by basement flooding in homes where the area's stormwater infrastructure was unable to handle the high volume of rain.

The Housing Unmet Needs Analysis evaluates the scale and distribution of housing-related damages caused by the disasters, the extent of assistance provided, and the remaining unmet need. This section analyzed data from FEMA's Individual Assistance (IA) program, the Small Business Administration's (SBA) Disaster Home Loan Program,

and National Flood Insurance Program (NFIP) data to quantify the unmet needs of both owner-occupied and renter-occupied households. The analysis considers real and personal property damage, occupancy type, assistance received, and financial need due to underinsurance or ineligibility for assistance.

However, the City recognizes that not all households requested assistance from FEMA IA, or SBA assistance, potentially leaving a gap between the impact recorded and the true impact of the disaster. Despite these limitations, it remains the best data sources for identifying individual and household disaster unmet needs for housing recovery. The following section provides an overview of the City's housing impacts because of FEMA DR-4728-IL, DR-4749-IL, DR-4819-IL.



Figure 9: Flood Damage in Basement

While many households received timely and adequate support according to the FEMA repair assistance, modest gaps remain—particularly among renters, uninsured households, and applicants with moderate damage who were unable to access SBA loans. Flooding was the primary cause of damage, and the overwhelming lack of flood insurance further contributed to financial exposure across both renter and homeowner populations.

The findings presented in this section provide the basis for understanding unmet recovery needs and inform the development of community-wide local strategies to promote housing recovery and improve future resilience.

2.2.2.1 Low- and Moderate Income (LMI) Analysis and Cost Burden

Table 6: LMI, Cost Burden, and Aging Housing

| Community Area | Ward | Average Median Household Income | Percent of LMI households in community area | Share of Households that are Cost-Burdened | Median year housing was built |
|--------------------|------------|---------------------------------|---|--|-------------------------------|
| West Garfield Park | 28 | \$36.5k | 78% | 63.8% | 1938 |
| East Garfield Park | 28 | \$38.5k | 77% | 58.0% | 1944 |
| Humboldt Park | 37 | \$54.9k | 72% | 49.0% | 1931 |
| Austin | 28, 29, 37 | \$51.9k | 64% | 55.2% | 1939 |
| Belmont Cragin | 30 | \$67.7k | 60% | 46.5% | 1936 |
| City-wide Average | - | \$72.6k | 53% | 39.3% | 1952 |

Due to this high-cost burden, residents in these areas may be unable to afford significant repairs such as removing impermeable materials and improving personal drainage systems. This financial strain negatively impacts the condition of housing units, as cost-burdened homeowners and landlords may have limited ability to invest in upgrades and repairs that can help prevent severe damage. Vulnerability of individual homes is compounded by area conditions including high numbers of vacant lots, underutilized properties, and aging infrastructure³⁵, causing the concentration of flooding damage in these wards.

2.2.2.2 FEMA IA Analysis

The table reflects disaster impact and recovery data for 102,208 total applicants, consisting of 56,545 owner-occupants and 45,126 renters. The data offers insights into verified losses and assistance awarded through FEMA's Individual Assistance (IA) program.

Owner-Occupant Impacts and Assistance

Homeowners experienced significant real property verified losses (RPFVL), totaling approximately \$144.6 million. **FEMA awarded \$149.4 million in repair assistance, exceeding the RPFVL amount**, which may reflect funding toward eligible repair activities across damage tiers or assistance unrelated to inspection amounts.

Renter Impacts and Assistance

Renters reported personal property verified losses (PPFVL) totaling \$32.1 million, yet

³⁵ [Why affordable housing is more vulnerable to disasters](#) United Nations Office for Disaster Risk Reduction 2024.

FEMA awarded only \$19.2 million in personal property assistance. This indicates a gap of approximately \$12.9 million in unmet need for renters, or a coverage rate of only about 60% of verified losses. This discrepancy may be due to eligibility issues, documentation barriers, or caps on FEMA awards for personal property.

Overall Observations

While homeowners received FEMA repair assistance commensurate with or exceeding their verified losses, renters experienced a more shortfall, suggesting an area of concern for unmet needs. Given that renters make up nearly 44% of total applicants, addressing this gap is critical to achieving recovery for renters impacted by disasters.

Table 7: Owner and Renter FEMA IA Losses and Awards

| Total Applicant Count | Total Owner | Total Owner RPFVL Amount | Total Renter | Total Renter PPFVL Amount | Total FEMA IA Repair Awards | Total FEMA IA Personal Property Awards |
|-----------------------|-------------|--------------------------|--------------|---------------------------|-----------------------------|--|
| 102,208 | 56,545 | \$144,576,203 | 45,126 | \$32,119,873 | \$149,387,629 | \$19,210,059 |

Table 8: Owner FEMA IA Damage and Verified Losses

| Total Owner Applications | Total # of Inspections | Total # of Insp With Damage | Total # Received Assistance | Total Owner FEMA Verified Loss |
|--------------------------|------------------------|-----------------------------|-----------------------------|--------------------------------|
| 56,545 | 51,903 | 35,863 | 33,820 | \$144,576,203 |

Of the 56,544 total owner applications, 51,903 resulted in FEMA inspections, indicating a high inspection rate of approximately 92%. Of those inspections, 35,863 (or 69%) showed verified damage, confirming a significant portion of homeowners experienced storm-related impacts.

FEMA provided assistance to 33,820 homeowners, representing about 94% of those with verified damage and about 65% of all owner applicants. This suggests strong follow-through from inspection to award, although roughly 2,000 applicants with verified damage did not receive assistance.

The total real property verified loss for owners amounted to \$144.6 million, aligning with earlier figures. This continues to emphasize the sizable damage sustained by homeowners, though the number of applicants with no damage or insufficient damage

for assistance (approximately 20,681, or 36% of those inspected) also indicates varied impact severity across neighborhoods.

Table 9: Renter FEMA IA Damage and Verified Losses

| Total Renter Applications | Total # of Inspections | Total # of Insp With Damage | Total # Received Assistance | Total Renter FEMA Verified Loss |
|---------------------------|------------------------|-----------------------------|-----------------------------|---------------------------------|
| 45,126 | 41,994 | 12,431 | 9,007 | \$32,119,873 |

Out of 45,126 total renter applications, 41,994 inspections were conducted—an inspection rate of over 93%. However, only 12,431 inspections (30%) showed verified damage, a much lower damage rate compared to owner-occupied units primarily due to the differences between real and personal property loss calculations and awards.

Among renters with personal property verified damage, only 9,007 received FEMA assistance, representing 72% of those with damage and just 20% of all renter applicants. This drop-off highlights potential impediments to assistance, including ineligibility, documentation gaps, or insufficient damage severity to meet FEMA thresholds.

The total personal property verified loss among renters was \$32.1 million, which is significantly lower than that of homeowners. Given the lower award rate and verified damage rate, this suggests that while fewer renters experienced qualifying losses, an unmet need still exists.

Landlords are presumed to have adequate insurance coverage to recovery from disaster impacts unless the renter unit is occupied by a tenant with income less than Federal poverty level or 50 percent of the area median income, whichever is less. According to the FEMA IA data income ranges provided by applicants, an estimated 67% of renter applicants reported income of \$30,000 or less. Therefore, there is likely unmet need for affordable rental housing in the impacted areas the infrastructure failed.

Table 10: FEMA IA Applicants With and Without Insurance

| Sum of With Flood Insurance - Owner | Sum of With Flood Insurance - Owner (\$) | Sum of With Flood Insurance - Renter | Sum of With Flood Insurance - Renter (\$) | Sum of Without Flood Insurance - Owner | Sum of Without Flood Insurance - Owner (\$) | Sum of Without Flood Insurance - Renter | Sum of Without Flood Insurance - Renter (\$) |
|--|---|---|--|--|--|---|--|
| 764 | \$5,768,706 | 120 | \$95,533 | 35,839 | \$136,739,859 | 16,396 | \$26,626,517 |

The data reveals that the vast majority of both owners and renters impacted by the disaster did not have flood insurance, underscoring a significant gap in disaster preparedness and financial coverage. Among homeowners, only 764 had flood insurance, with verified losses totaling approximately \$5.77 million. In stark contrast, 35,839 homeowners lacked flood insurance and sustained verified losses amounting to \$136.74 million. This means that 98 percent of flood-impacted homeowners were uninsured, bearing nearly 96 percent of the total verified flood losses among owner-occupants.

A similar trend was observed among renters. Only 120 renters had flood insurance, with a total of just \$95,533 in verified losses—a marginal figure compared to the broader dataset. Meanwhile, 16,396 renters without flood insurance sustained verified losses of \$26.63 million. This indicates that 99 percent of renters affected by flooding were uninsured, accounting for over 99 percent of renter-verified flood losses. These figures highlight a widespread lack of flood insurance coverage among both owners and renters, which significantly increases reliance fully functioning and reliable infrastructure on limited federal assistance.

Table 11: FEMA IA Applicants by Tenure and Housing Type

| Category | Total Applications | Total Owner Occupied | % | Total Renter Occupied | % | Total Unknown Occupancy | % |
|--------------------------|-----------------------|-------------------------|-----------|-----------------------------|------------|-------------------------------|-------------|
| Apartment | 20,849 | 264 | 0% | 20,505 | 20% | 80 | 0.1% |
| Assisted Living Facility | 33 | - | 0% | 33 | 0% | - | 0.0% |
| Boat | 1 | 1 | 0% | - | 0% | - | 0.0% |
| College Dorm | 1 | - | 0% | 1 | 0% | - | 0.0% |
| Condo | 1,054 | 739 | 1% | 309 | 0% | 6 | 0.0% |

| | | | | | | | |
|-----------------------|----------------|---------------|------------|---------------|------------|------------|-------------|
| Correctional Facility | 6 | - | 0% | 6 | 0% | - | 0.0% |
| House/Duplex | 74,428 | 53,111 | 52% | 20,962 | 21% | 355 | 0.3% |
| Military Housing | 7 | 1 | 0% | 6 | 0% | - | 0.0% |
| Mobile Home | 137 | 55 | 0% | 82 | 0% | - | 0.0% |
| Other | 2,025 | 964 | 1% | 979 | 1% | 82 | 0.1% |
| Townhouse | 3,652 | 1,404 | 1% | 2,234 | 2% | 14 | 0.0% |
| Travel Trailer | 8 | 5 | 0% | 3 | 0% | - | 0.0% |
| Grand Total | 102,201 | 56,544 | 55% | 45,120 | 44% | 537 | 1% |

The data reflects a total of 102,201 disaster applications, offering insight into structure type and occupancy status—owner-occupied, renter-occupied, and unknown. The vast majority of applicants resided in House/Duplex units, which accounted for 74,428 applications, or approximately 73% of the total. Of these, 53,111 were owner-occupied, making up 52% of all applications and 94% of all owner-occupied units. An additional 20,962 House/Duplex units were renter-occupied, representing 21% of all applications. This dominance indicates that most homeowners live in traditional single-family structures, which also bore the brunt of the disaster's impact.

Apartments represented the second-largest structure type with 20,849 applications, or 20% of the total. Nearly all of these—20,505 applications—were from renters, making up 46% of all renter-occupied units. In contrast, only 264 applications from apartments were owner-occupied, underscoring the expected concentration of renters in multifamily buildings.

Other structure types, including condominiums and townhouses, comprised a smaller share of the total—between 1% and 2% each. These showed a more even distribution between owner- and renter-occupied units.

Table 12: FEMA IA Damage Severity by Housing Type

| Housing Type | Major High and Severe | Minor Low to Major Low |
|------------------|-----------------------|------------------------|
| Apartment | 2 | 82 |
| Condo | 4 | 297 |
| House Duplex | 828 | 34,661 |
| Military Housing | - | 1 |
| Mobile Home | 4 | 20 |
| Townhouse | 36 | 838 |

| | | |
|--------------|------------|---------------|
| Other | - | 17 |
| Total | 874 | 35,916 |

The damage severity data categorizes impacted housing units into two tiers: “Major High and Severe” (indicating substantial structural damage or uninhabitable conditions) and “Minor Low to Major Low” (less severe damage still eligible for assistance). Overall, there were 874 units classified as having major or severe damage and 35,916 units with lower-tier damage. The data clearly shows that House/Duplex structures were disproportionately affected, with 828 of the 874 severely damaged units (95%) falling into this category. Additionally, House/Duplex units accounted for 34,661 of the lower-tier damaged units, confirming that detached, single-family homes absorbed the greatest share of the disaster’s impact.

In contrast, multifamily housing experienced far less severe damage. Apartments had only 2 units classified as Major/Severe and 82 units with minor or moderate damage. Condominiums followed a similar pattern, with 4 Major/Severe and 297 Minor to Major Low cases. Townhouses were slightly more affected, reporting 36 Major/Severe and 838 lower-tier damaged units. These trends suggest that multifamily structures may have offered greater resilience to the storm, or that damage in these buildings was limited to non-critical components such as utilities, finishes, or exterior features.

Other housing types, such as mobile homes, military housing, and structures categorized as “Other”, showed minimal reported damage. Mobile homes had only 4 severely damaged units and 20 units with lesser damage. Military housing and “Other” categories reported negligible or no damage, possibly due to their limited presence in the impacted area or differences in construction standards and location.

Altogether, this analysis highlights that single-family detached housing was the most vulnerable to severe damage, which has important implications for the design of recovery and mitigation programs. It underscores the need for focused investment in rehabilitating or reconstructing these units and ensuring future storm resilience.

Table 13: FEMA IA Applicant Housing Tenure by Flood Damage

| Total FEMA IA Applications With Flood Damage | Total Owner With Flood Damage | Total Renter With Flood Damage | Owner Total Damage | Renter Total Damage | Total Flood Damage |
|--|-------------------------------|--------------------------------|--------------------|---------------------|--------------------|
| 50,311 | 35,652 | 14,659 | 162,315,323 | \$24,700,512 | \$ 187,015,835 |

The data indicates that 50,311 FEMA Individual Assistance applicants reported flood damage, comprising a significant portion of the total disaster-affected population. This underscores flooding as a primary driver of loss during the disaster event.

A breakdown by occupancy type reveals that homeowners were disproportionately impacted, with 35,652 owner applicants (71%) reporting flood damage, compared to 14,659 renters (29%). This aligns with earlier findings showing that owner-occupied, single-family homes—particularly House/Duplex structures—bore the brunt of the disaster’s impact. The high proportion of owner applications is likely due to the concentration of detached homes in flood-prone areas, which tend to be more vulnerable to stormwater inundation and drainage system failures.

The financial impact further highlights this disparity. Homeowners incurred \$162.3 million in verified flood damage (real and personal property), representing 87% of the total flood-related verified losses. Renters, on the other hand, incurred \$24.7 million, or 13% of the total, with most losses tied to personal property rather than structural damage. On average, the verified flood damage per owner was approximately \$4,553, while renters averaged about \$1,685 in losses—underscoring that homeowners faced higher-cost structural repairs, whereas renters primarily lost household belongings.

In total, \$187 million in verified flood damages (real and personal property) were recorded, reinforcing that flooding was the dominant hazard and a key factor driving housing-related recovery needs. This figure will play a critical role in assessing the overall scale of unmet needs and determining the appropriate level of investment in housing rehabilitation, mitigation infrastructure, and voluntary buyout programs, especially for households that were uninsured or otherwise vulnerable to long-term recovery challenges.

Table 14: FEMA IA Applicant PPVL and RVL with and without Insurance

| Sum of Total Applicants Without Flood Ins | Sum of Flood Damaged and Sustaining Real or Personal Property Losses Without Flood Ins | Sum of Total Personal And Property Loses Without Flood Ins | Sum of Total Applicants With Flood Ins | Sum of Flood Damaged and Sustaining Real or Personal Property Losses With Flood Ins | Sum of Total Personal And Property Loses With Flood Ins |
|---|--|--|--|---|---|
| 100,740 | 50,495 | \$ 189,342,584 | 1,468 | 855 | \$ 3,538,394 |

The data reveals a stark divide between insured and uninsured applicants affected by flood damage, underscoring the critical importance of flood insurance in reducing financial vulnerability during disaster recovery. Out of 102,208 total applicants, a staggering 100,740 individuals—approximately 98.6%—did not have flood insurance. Within this uninsured group, 50,495 applicants experienced verified real or personal property flood damage, illustrating that a substantial portion of those without coverage also sustained tangible losses.

In contrast, only 1,468 applicants (1.4%) reported having flood insurance, and just 855 of them sustained verified flood-related losses. This extremely low rate of coverage, even among those who experienced damage, highlights a widespread lack of financial protection in the face of flooding.

The financial implications of this coverage gap are significant. Uninsured applicants accounted for \$189.3 million in verified flood-related losses, which represents 98% of all reported flood damages. Meanwhile, insured applicants sustained just \$3.54 million in losses, a small fraction of the total. On average, uninsured applicants with verified losses experienced \$3,749 in damage, while insured applicants had a slightly higher average of \$4,140—but the number of insured households was too small to meaningfully affect broader recovery trends.

Overall, the data clearly shows that flood insurance penetration was extremely low, even among those most directly affected by flood events. This has contributed to widespread unmet needs, leaving many households—particularly low- and moderate-income residents—without the resources to adequately recover. These findings reinforce the urgent need for targeted mitigation strategies, improved outreach around insurance options, and recovery programs designed to support uninsured households.

2.2.2.3 SBA Home Disaster Loan Analysis

Chicago residents impacted by these disasters were also eligible for Small Business Administration (SBA) Disaster Home Loans to repair or replace homes and personal property. 6,325 residents applied for loans to address an average of \$16K in property damage, with the largest verified losses occurring in July 2023.

Table 15: SBA Home Loan Applications

| FEMA Declaration Number | Loan Applications | Loans Awarded | Average Verified Loss |
|------------------------------|-------------------|---------------|-----------------------|
| 4728 (July 2023) | 1,683 | 1,431 | \$35,846.54 |
| 4749 (September 2023) | 2,628 | 216 | \$9,044.95 |

| | | | |
|------------------------------|--------------|--------------|--------------------|
| 4819 (September 2024) | 2,014 | 201 | \$7,190.97 |
| Total | 6,325 | 1,848 | \$15,586.16 |

SBA has provided over \$58M in loans to Chicago residents since 2023 and reported an additional \$1.1M in insurance paid out to homeowners.

Table 16: SBA Home Loan Awards

| FEMA Declaration Number | Total Verified Loss | Current Loan Amount | Insurance Total |
|--------------------------------|----------------------------|----------------------------|------------------------|
| 4728 (July 2023) | \$60,329,732.32 | \$42,603,314.00 | \$296,959.00 |
| 4749 (September 2023) | \$23,770,129.52 | \$7,344,921.00 | \$620,350.08 |
| 4819 (September 2024) | \$14,482,606.18 | \$8,469,600.00 | \$231,820.58 |
| Total | \$98,582,468.02 | \$58,417,835.00 | \$1,149,129.66 |

2.2.2.4 National Flood Insurance Program (NFIP) Analysis

The City also evaluated claims and awards provided by the National Flood Insurance Program (NFIP)³⁶. The NFIP helps property owners, renters, and businesses financially protect themselves from flood damage by covering both structures and contents. Just over 1,000 residents in Chicago are NFIP policyholders, and only 33 residents submitted claims for damage related to DR-4728-IL, DR-4749-IL, and DR-4819-IL.

Table 17: Amount of Insurance Coverage Across Housing Type

| Housing Type | Building Damage Assessment | Contents Damage Assessment | Total Damage Amount | Building Damage Pay Out | Contents Damage Pay Out | Unmet Need |
|---|-----------------------------------|-----------------------------------|----------------------------|--------------------------------|--------------------------------|-------------------|
| Single-family residential building with the exception of a mobile home or a single residential unit within a multi-unit building | \$120,891 | \$14,265 | \$135,156 | \$116,336 | \$8,480 | \$10,341 |
| A residential non-condo building with 2-, 3-, or 4-units seeking | \$3,946 | \$0.00 | \$3,946 | \$2,946 | \$0.00 | \$1,000 |

³⁶ [OpenFEMA Data Sets - NFIP](#) FEMA 2025.

| Housing Type | Building Damage Assessment | Contents Damage Assessment | Total Damage Amount | Building Damage Pay Out | Contents Damage Pay Out | Unmet Need |
|---|----------------------------|----------------------------|---------------------|-------------------------|-------------------------|-----------------|
| insurance on all units | | | | | | |
| Single residential unit within a multi-unit building | \$11,011 | \$529 | \$11,540 | \$9,063 | \$0.00 | \$2,477 |
| Total | \$135,848 | \$14,794 | \$150,642 | \$128,345 | \$8,480 | \$13,818 |

NFIP claims totaled \$150,642 across Chicago with many claims being linked to building cost (90.2%) and the remaining relating to building contents (9.8%). Properties damaged had damages valued at \$135,848 with contents inside the properties valued at \$14,794. The average claim payout was \$4,140, demonstrating the minimal coverage residents received. Residential buildings experienced the greatest damage and saw the greatest amount of insurance payouts.

Additional insurance claims through either private homeowners' or renters' insurance were unable to be assessed at this time. The City is collaborating with the Illinois Department of Insurance³⁷ to gather further information on the unmet need addressed by private insurance claims.

While insurance payouts provide insight into the level of damage caused by flooding and severe storms, the City understands that it may not capture all impacts to area residents. The relatively low number of claims via NFIP is consistent with the amount of Chicago residents registered for NFIP. Many Chicagoans in the most impacted areas do not have flood insurance because they are already severely cost-burdened³⁸, standard renters or homeowners insurance does not cover flooding, or their housing is not located in traditional floodplains³⁹. Rather, their housing experiences flooding due to aging infrastructure⁴⁰. These conditions are disproportionately present in the West Side wards of 28, 29, 30, and 37. According to the U.S. Census Bureau⁴¹ and the Bureau of Labor Statistics⁴², 47% of Chicago residents are cost-burdened, spending on average

³⁷ [Disasters](#) Illinois Department of Insurance 2025.

³⁸ [Fewer US Homes Are Insured Against Floods Even as Risks Are Rising](#) EconoFact 2024.

³⁹ [Urban Flooding Fact Page](#) Center for Neighborhood Technology 2025.

⁴⁰ [Floods Destroyed West Side Homes – And Climate Change Will Keep Battering Underserved Communities, Experts Say](#) Block Club Chicago 2023.

⁴¹ [Nearly half of Chicago renters spend too much for rent and utilities](#) Chicago Sun-Times 2024.

⁴² [Consumer Expenditures in the Chicago Metropolitan Area – 2022–23](#) US Bureau of Labor Statistics Midwest Information Office 2023.

34.1% of their income on housing; this proportion is as high as 63.8% in the wards with highest levels of storm damage.

2.2.2.5 Owner- and Renter-Occupied Housing Summary

Table 18: Amount of Insurance Coverage Across Housing Type

| | Impact | Assistance | Unmet Need |
|--------------------------------|-----------------------|-----------------------|----------------------|
| FEMA Real Property Loss | \$ 144,576,203 | \$ 149,387,629 | \$ (4,811,426) |
| NFIP Claim Loss | \$ 150,642 | \$ 136,824 | \$ 13,818 |
| SBA Verified Loss | \$ 98,582,468 | \$ 59,566,965 | \$ 39,015,503 |
| | \$ 243,309,313 | \$ 209,091,418 | \$ 34,217,895 |

Single-family homes (House/Duplex) experienced the majority of severe damage, particularly among homeowners, who were the most impacted group. Renters were primarily affected in apartment structures, where the damage was generally less severe but still widespread. This distinction in housing types is important for targeting recovery resources appropriately.

FEMA assistance met or exceeded verified losses for homeowners. The total FEMA repair assistance provided to owner-occupants closely aligned with the \$144.6 million in verified losses, indicating that FEMA grants were largely sufficient for many applicants in this group. In contrast, renters received only about 60% of their verified personal property losses, highlighting a significant gap in recovery support for tenant households and signaling a need for renter-focused interventions.

Flooding was the dominant hazard in the disaster, affecting over 50,000 applicants. Alarming, 99% of those affected lacked flood insurance. Uninsured applicants accounted for more than \$189 million in verified flood-related losses (real and personal property), representing 98% of all flood damages. This overwhelming lack of insurance coverage has contributed to widespread unmet needs and increased reliance on public recovery programs.

SBA verified nearly \$98 million in disaster-related losses but approved only \$58 million in loans and \$1 million in insurance, leaving \$39 million in unmet needs.

Although CDBG-DR funds will not be used to support housing recovery in this case, the City has acknowledged the remaining gaps and has committed over \$43.5 million in local resources to address the most pressing unmet needs. Local funding will be used to assist impacted households—particularly low- and moderate-income renters and homeowners—who were underinsured or unable to access sufficient FEMA or SBA assistance. This local commitment demonstrates the City's dedication to supporting a

comprehensive and equitable recovery, even in the absence of federal housing recovery funds.

2.2.3 Emergency Shelters, Interim, and Permanent Housing

In alignment with HUD guidance, the City has assessed the impact of the storms on emergency shelters, interim, and permanent housing. The availability and full function of emergency shelters and supportive housing is especially critical during natural disasters, given the need to provide temporary shelter for residents whose homes are uninhabitable due to flood damage or loss of power. **Figure 10** indicates that there was no significant change in emergency shelter intake from DR-4728-IL to DR-4749-IL.

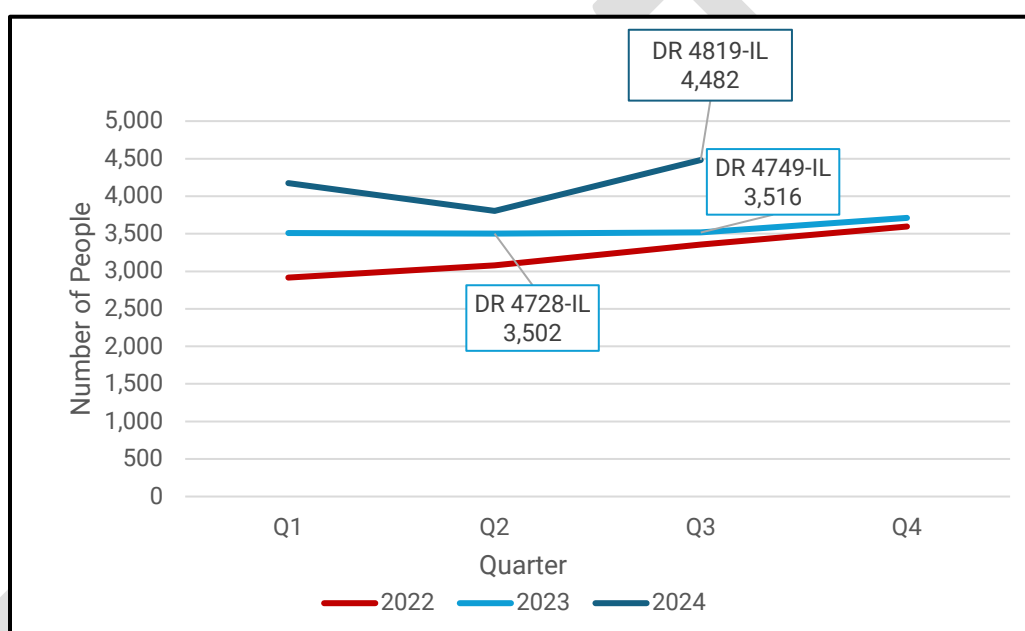


Figure 10: Line graph of homeless shelter occupancy by quarter for the Continuum of Care Annual Homeless Report.

Throughout the DR-4728-IL and DR-4749-IL storm periods, shelter intake numbers remained consistent with pre-disaster conditions. Data reported from all shelters included within the City's Continuum of Care (CoC) provided by the City's Department of Family and Support Services (DFSS) showed that occupancy rates before and after the storm periods trended between 94% - 96%, while during the storm period occupancy rates trended between 92% - 96%. This stability suggests that the City's shelter capacity was not impacted by the storm events.

Since the initial flooding incident in July 2023, the CoC data has shown that the demand for shelters has continued to grow. **Table 19** indicates an increase in shelter intake during the DR-4819-IL storm period, however, the City's analysis has found that this increase was not driven by storm-related damage, but rather, by the increase of

unhoused populations in Chicago due to other factors according to the 2024 Annual Homelessness Report.⁴³

Table 19: Intake of Emergency Housing Shelter

| | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 |
|-------------|-----------|-----------|-----------|------------------|
| 2022 | 2,916 | 3,079 | 3,355 | 3,596 |
| 2023 | 3,510 | 3,502 | 3,516 | 3,711 |
| 2024 | 4,175 | 3,804 | 4,482 | Data Unavailable |

2.2.4 Public Housing and Other Affordable Housing

The City is committed to providing access to housing options for its residents, including public or other assisted affordable housing. Chicago has 106 public housing facilities which serve 25,504 residents.⁴⁴ As part of its assessment of disaster-related impacts, the City worked with the Chicago Housing Authority (CHA) and evaluated the damage to its public housing facilities and found that of 33,469 public housing and project-based voucher (PBV) units, 14 units reported flood damage.⁴⁵ Given the minimal flood damage from the disasters, the CHA, as a HUD-designated Moving to Work (MTW) agency, has resources to address impacts, and does not have any unmet recovery needs. **Figure 11** highlights that City's public housing locations are primarily located outside of the areas with the highest amounts of flood damage, indicating minimal impact to public housing facilities stemming from the disasters.⁴⁶ The City of Chicago will continue to coordinate with the housing authority throughout its recovery to track any additional impacts, and ensure ample resources are available to mitigate future flooding impacts to their residents and properties through targeted water management infrastructure investments that will not only serve individual households, but the larger low- and moderate-income households living in these areas.

⁴³ [City of Chicago: 2024 Annual Report on Homelessness](#) City of Chicago 2024.

⁴⁴ [Public Housing \(PH\) Demographics](#) Chicago Housing Authority Data & Impact Hub 2025.

⁴⁵ [CHA Project-Based Voucher and Public Housing Flood Risk Data](#). Chicago Housing Authority (CHA), shared with the City of Chicago 2025.

⁴⁶ [Public Housing Developments](#) HUD Geospatial Data Storefront 2025

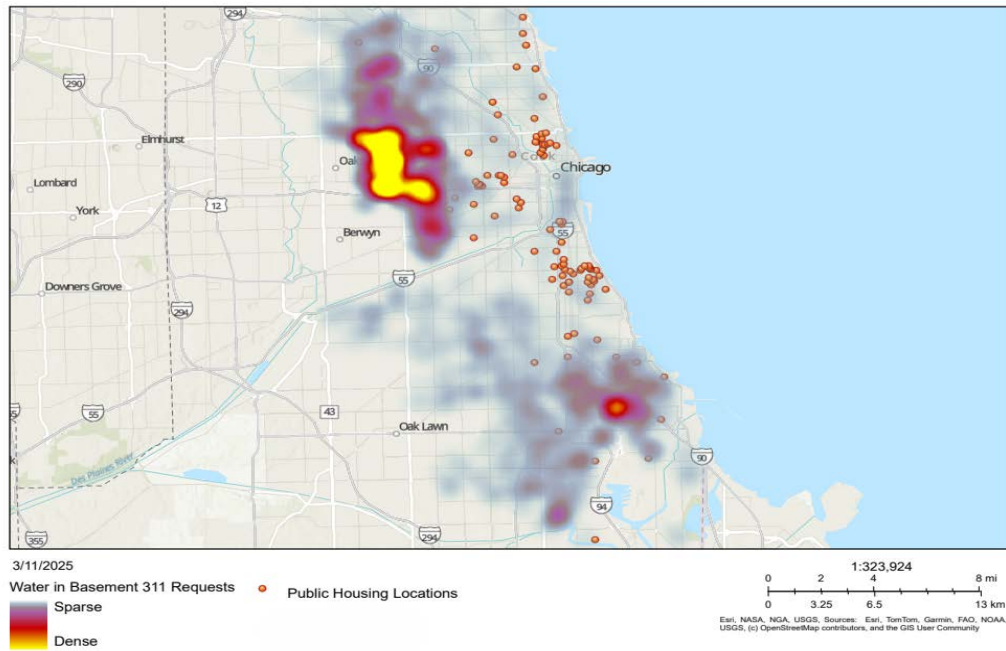


Figure 11: Chicago Public Housing locations mapped across the flooding in basement 311 calls.

2.3 Infrastructure Unmet Needs Assessment

The City of Chicago did not receive a FEMA Public Assistance (PA) allocation for the federally declared disasters addressed in this Action Plan. Although the City was approved for FEMA Individual Assistance (IA) to support residents affected by each event, it did not meet the eligibility threshold for FEMA PA, which typically provides funding for the repair and replacement of damaged public infrastructure, emergency protective measures, and debris removal. As a result, the City did not receive federal support to offset municipal recovery costs related to infrastructure damage or emergency response. This lack of FEMA PA funding has placed added pressure on local resources and highlights the importance of leveraging CDBG-DR funds to address unmet infrastructure needs, support long-term recovery, and enhance community resilience.

The age, size and failure to function of Chicago's stormwater infrastructure was the primary cause of damage to housing, business and the community, due to the system's severely limited ability to effectively manage and absorb the unprecedented amount of rain during the severe storms of 2023 and 2024. Additionally, severe storms brought damage associated with severe straight-line winds and tornadoes, causing trees and electric wires to fall. Damage assessments following the storm events of 2024 found more than 2,000 residences impacted. As the City has assessed the damage caused by these events and developed recovery priorities, improving stormwater infrastructure has been identified as the most pressing need.

2.3.1 Summary of Unmet Infrastructure Needs

The failure of the City's storm- and waste-water management system was a direct contributor to the widespread flooding of residential units and basements across the impacted areas of Chicago. This system's inability to manage the volume of stormwater during the disaster events resulted in significant housing impacts—particularly in low-lying, densely populated, low- and moderate-income neighborhoods. Had the system functioned effectively, much of the residential flooding and associated damage could have been prevented. This failure illustrates how infrastructure systems are not only public assets but also critical safeguards for housing stability. The performance, or failure of storm- and waste-water infrastructure is intrinsically linked to residential resilience or damage impacts. Its failure is both an infrastructure and housing unmet need. Addressing this dual gap is essential to protecting housing, reducing displacement, and preventing repetitive loss in future events.

Surface-level damage to streets, debris removal, and critical infrastructure needs have been addressed both in the immediate response to severe storms and in the course of standard operations in the time since. To support ongoing recovery and future infrastructure mitigation unmet needs, the City's estimated unmet infrastructure need is approximately \$919.4M when combining impacts and assistance associated with the disaster events.

This total incorporates the initial damage assessments completed by the City following DR-4728-IL and DR-4819-IL, in addition to DWM's estimates of the cost needed to repair existing sewer deficiencies.

Table 20: Infrastructure Unmet Need

| Cost Category | Cost | Resiliency Factor (30%) | Increased Costs Factor (26.9%) | Federal Share | Local Share (Unmet Need) |
|--|-----------------------|-------------------------|--------------------------------|---------------|--------------------------|
| Category A - Debris Removal | \$ 2,856,114 | \$ - | \$ - | \$ - | \$ - |
| Category B - Emergency Protective Measures | \$ 45,181 | \$ - | \$ - | \$ - | \$ - |
| Category C - Roads and Bridges | \$ 361,153 | \$ 469,498 | \$ 595,793 | \$ - | \$ 595,793 |
| Category D - Water Control Facilities | \$ 81,186 | \$ 105,542 | \$ 133,932 | \$ - | \$ 133,932 |
| Category E - Public Buildings and Contents | \$ 2,188,455 | \$ 2,844,992 | \$ 3,610,294 | \$ - | \$ 3,610,294 |
| Category F - Public Utilities | \$ 955,491 | \$ 1,242,138 | \$ 1,576,273 | \$ - | \$ 1,576,273 |
| Category G - Parks, Recreation, and Other Facilities | \$ 3,907,665 | \$ 5,079,965 | \$ 6,446,475 | \$ - | \$ 6,446,475 |
| Infrastructure in support of Housing | \$ 907,100,000 | \$ - | \$ 907,100,000 | \$ - | \$ 907,100,000 |
| Totals | \$ 917,495,244 | \$ 9,742,134 | \$ 919,462,768 | \$ - | \$ 919,462,768 |

2.3.2 Stormwater Infrastructure



Figure 12: Flooded Basement Damage

The most severe impacts from the recent storms stemmed from the City's stormwater infrastructure failure to function. Flood damage was most severe in July 2023 (FEMA DR-4728-IL), when approximately 9.1 inches of rain fell over a two-day period⁴⁷. The intense amount of rain overwhelmed the area's stormwater infrastructure which collected a high volume of debris in addition to rainwater, causing stormwater and wastewater to back up from pipes onto streets and residential basements throughout the impacted neighborhoods.

⁴⁷ [The July 2 and September 17, 2023, Flash Flood Events in the Chicago Metro Area](#) National Weather Service 2023.



Figure 13: Vehicles stranded in flooded viaduct

During this storm, there was widespread flooding in Chicago's streets that caused major road closures and temporary pauses in public transportation services,⁴⁸ including:

- Interstate 290
- Interstate 55 near Pulaski Road – at least 10 cars trapped
- Blue Line trains between UIC/Halsted and Forest Park
- Pink Line trains between Pulaski and 54th/Cermak

According to an internal incident report by OEMC, following a damage evaluation, the City's departments quickly mobilized to ensure the streets could be cleared for use as soon as possible. The Department of Streets and Sanitation (DSS) deployed 375 personnel members across 125 refuse trucks and 15 sweepers citywide. Chicago's Department of Water Management (DWM) deployed 44 personnel members across 18 trucks and Vactor trucks, which are large utility vehicles equipped with vacuum and water jet hoses for cleaning sewer systems, across the City.

⁴⁸ [Heavy rains flood Chicago roads and force a downtown street race to be cut short](#) NPR 2023.

DWM also assisted in the street flooding response by deploying 50 crews, which consisted of 122 personnel members, and were supported by Chicago's Department of Transportation (CDOT) personnel and Vactor trucks to respond to flooded street complaints.



Figure 14: Vactor Truck

Per OEMC's incident report, OEMC and DWM personnel also delivered 1,400 Salvation Army and Red Cross Emergency Flood Clean-Up Kits to heavily impacted wards. These kits included items to help flood victims remediate immediate damage, including gloves, brooms, mops, trash bags, and detergent.

In the aftermath of the severe storms in July 2023 (FEMA DR-4728-IL), OEMC completed a comprehensive assessment of the resulting infrastructure damages to identify the scale of repairs needed. These categories cover initial damage assessments and remediation efforts, broken down into costs such as overtime labor, equipment, and contract costs. **Table 21** highlights the breakdown of costs by infrastructure type from OEMC's analysis, totaling \$10.8 million in damages.

Table 21: OEMC Infrastructure Damage Estimated Costs (DR-4728)

| Cost Category (DR-4728-IL) | Cost | Resiliency Factor (30%) | Increased Costs Factor (26.9%) | Federal Share | Local Share (Unmet Need) |
|--|---------------------|-------------------------|--------------------------------|---------------|--------------------------|
| Category A - Debris Removal | \$ 764,247 | \$ - | \$ - | \$ - | \$ - |
| Category B - Emergency Protective Measures | \$ - | \$ - | \$ - | \$ - | \$ - |
| Category C - Roads and Bridges | \$ 64,000 | \$ 83,200 | \$ 105,580 | \$ - | \$ 105,580 |
| Category D - Water Control Facilities | \$ - | \$ - | \$ - | \$ - | \$ - |
| Category E - Public Buildings and Contents | \$ 2,109,000 | \$ 2,741,700 | \$ 3,479,217 | \$ - | \$ 3,479,217 |
| Category F - Public Utilities | \$ 658,338 | \$ 855,840 | \$ 1,086,060 | \$ - | \$ 1,086,060 |
| Category G - Parks, Recreation, and Other Facilities | \$ 3,704,546 | \$ 4,815,911 | \$ 6,111,390 | \$ - | \$ 6,111,390 |
| | \$ 7,300,131 | \$ 8,496,651 | \$ 10,782,247 | \$ - | \$ 10,782,247 |

While the City and its local government partners have made investments in infrastructure projects such as the Chicago Area Waterway System (CAWS) and the TARP to expand Chicago's capacity to absorb stormwater, the City still faced extensive street flooding. During FEMA DR-4728-IL, OEMC received 646 reports⁴⁹ of water on the street across the City between July 1st and July 3rd, representing an increase of over 600% from the weekend prior (109 reports) and weekend following (102 reports). **Figure 15** visualizes this widespread reporting, with residents across the City reporting flooded streets.

⁴⁹ [311 Service Requests - Point Map](#) 311 Chicago Data Portal 2025.

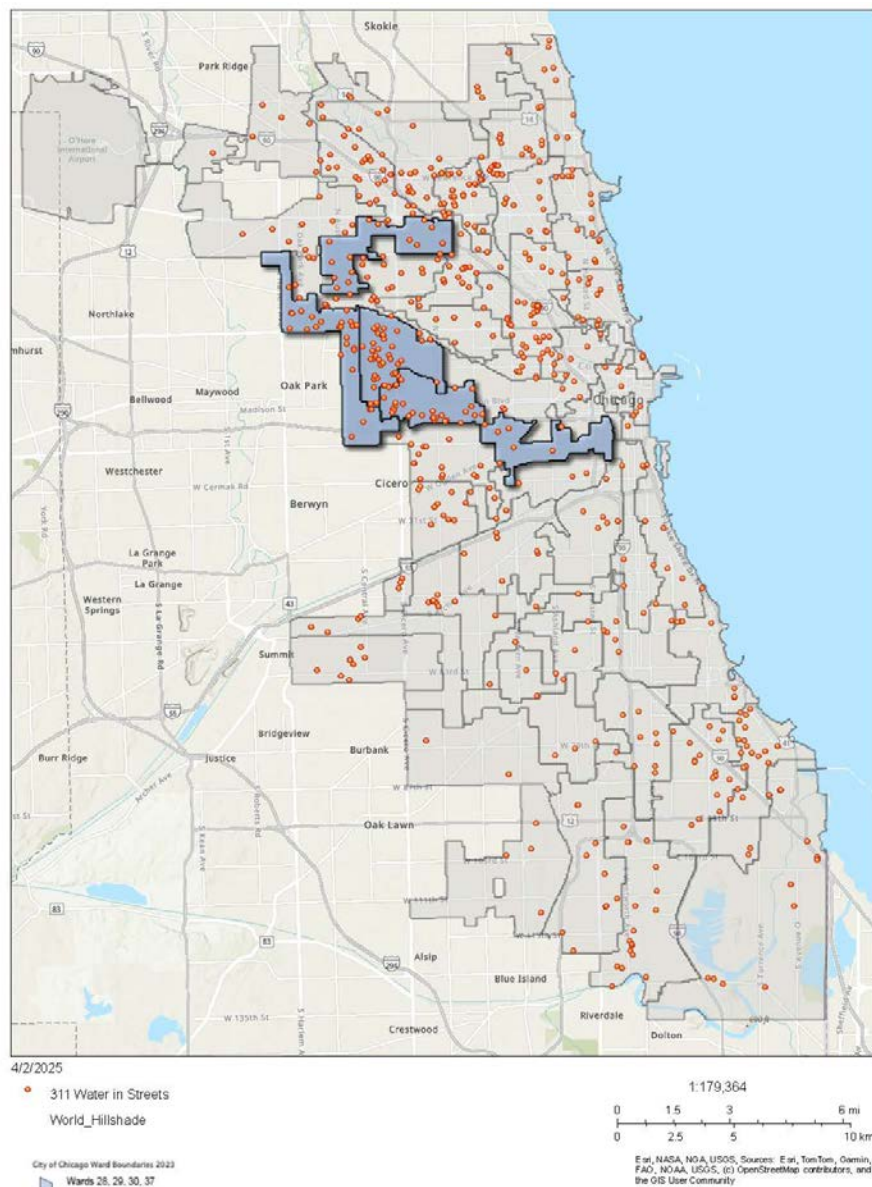


Figure 15: 311 OEMC Complaints Water on Street

While some degree of street flooding is expected during extreme weather events, the most disastrous storm damage was not experienced equally across Chicago. During the July 2023 storm, OEMC received 1,365 reports⁵⁰ of flooded basements, overwhelmingly concentrated on the City's West Side. **Figure 16** illustrates reports of basement flooding, with the ward boundaries included. Despite representing only 9.2% of Chicago's population,⁵¹ wards 28, 29, 30, and 37 generated 35% of the City's flooding reports.

⁵⁰ [311 Service Requests - Point Map](#) 311 Chicago Data Portal 2025.

⁵¹ [U.S. Census Bureau QuickFacts: Chicago city, Illinois](#) US Census Bureau 2025.

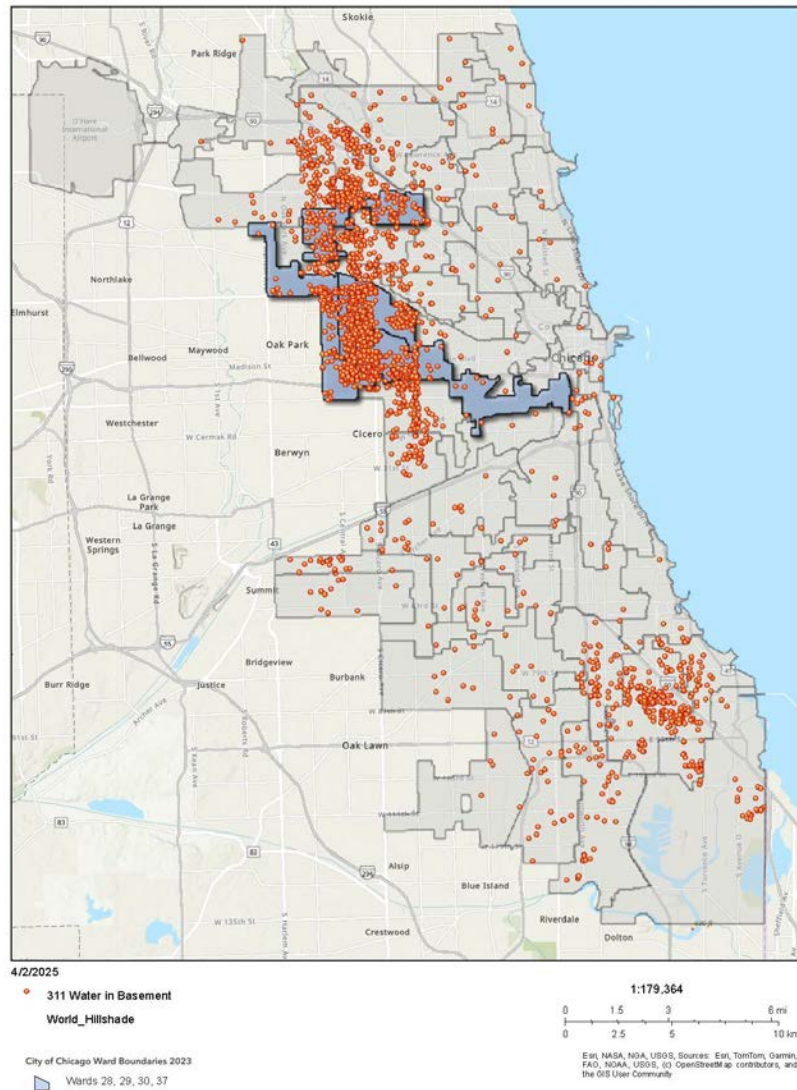


Figure 16: 311 OEMC Complaints Water in Basement

Concentrated reports of basement flooding can indicate insufficiency of area infrastructure. As part of the City's combined sewer build, the stormwater infrastructure is designed to capture excess water at the street level to prevent combined sewer backups into homes and basements. **Figure 17** visualizes how stormwater and wastewater infrastructure systems are connected, and as a result, can lead to basement flooding during severe storms.

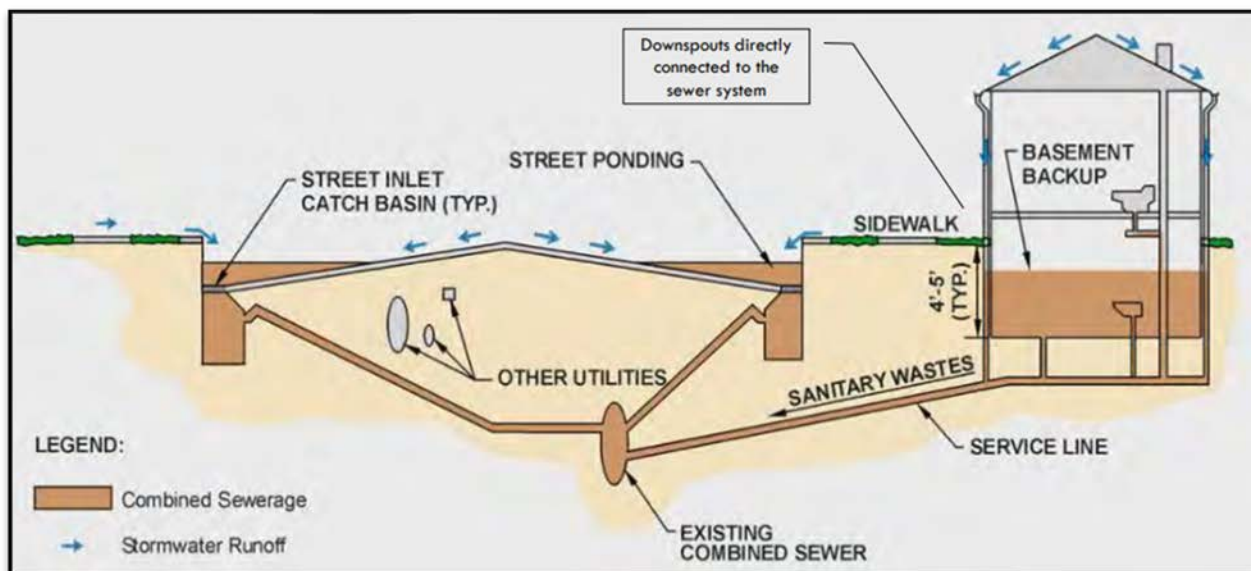


Figure17: DWM Local Sewer Infrastructure Diagram

Based on this design, it is critical to modernize sewer infrastructure in the areas where flooding is most common. Wards 28, 29, 30, and 37 faced the worst of the City's flooding damage, and these wards still face exacerbated flood risk due to older and smaller sewer lines.

Similar damage was reported during the subsequent storms in September 2023, compounding the flood-based damage to streets in areas still recovering from the impacts of the storm in July of that same year. These flood-related complaints consisted of calls from members of the public regarding fallen trees, streetlight or traffic signal issues, flooded basements and streets, and plumbing issues.

Table 22: 311 Flood Complaints by Disaster

| FEMA Declaration Number | Number of Flood-Related Complaints | Number of Complaints in West Side Wards | Percentage of Reports in West Side Wards |
|-------------------------|------------------------------------|---|--|
| 4728 (July 2023) | 1,870 | 715 | 38.23% |
| 4749 (September 2023) | 251 | 29 | 11.55% |
| Total | 2,121 | 744 | 35.01% |

The concentration of basement flooding complaints is consistent with the City's findings regarding damage to housing in **Section 2.2**, a direct connection between the failure of infrastructure and increased prevalence of urban flooding. Wards 28, 29, 30, and 37 were subject to disproportionate storm damage due to the infrastructure failure to function.

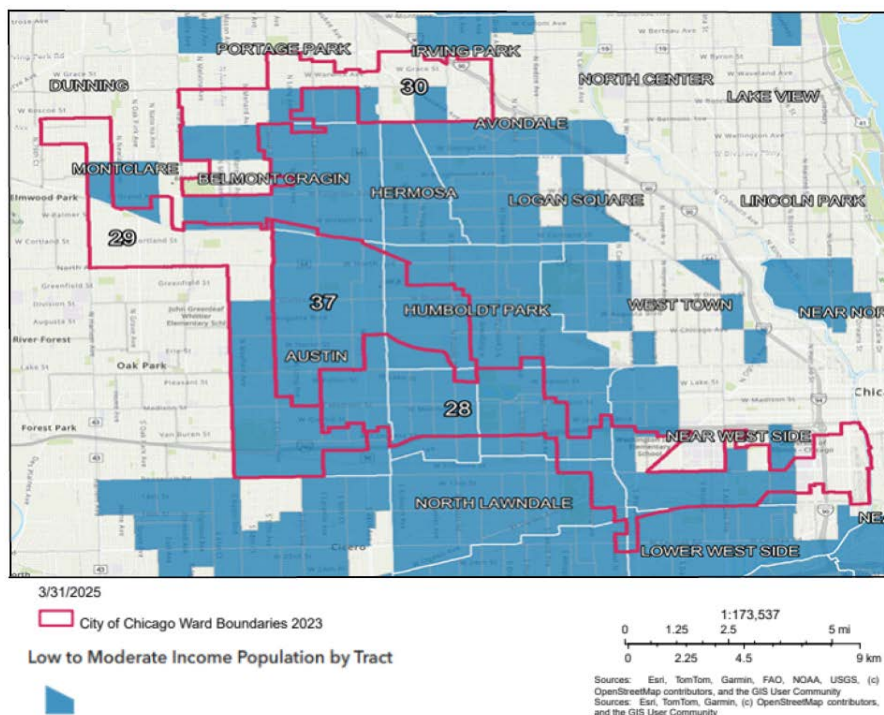


Figure 18: Census Tracts with > 50% LMI shown in blue with wards 28, 29, 30, 37 outlined in red.

The sewers in these wards 28, 29, 30, and 37 are aged and undersized; given the average age of these sewers ranges from 75 – 91 years, they all are targets for reconstruction by DWM. Sewers built nearly a century ago must be upgraded to DWM's modern standards in order to meet the needs of today's communities for today's weather events.

Table 23: DWM Analysis of Average Sewer Age

| Location | Average Sewer Age |
|----------------|-------------------|
| Ward 28 | 90.8 |
| Ward 29 | 75.3 |
| Ward 30 | 76.8 |
| Ward 37 | 79.9 |

The age of sewer infrastructure in these wards represents not only the wear and tear of several decades of use, but also the lack of upgrades of sewer size that can improve the area's ability to convey water and prevent flooding. Smaller sewer lines have less

capacity for high volumes of stormwater and clog faster when collecting large amounts of debris, limiting their efficacy, especially during extreme rain events.

In wards 28, 29, 30, and 37, over 200 miles of local sewers, with diameters ranging from 12 inches to 36 inches, only make up one third of the DWM-identified local sewers needing improvement to ensure the system's ability to handle a five-year storm.

Similarly, over 50 miles of the area's trunk sewer lines, with diameters ranging from 42 inches to 360 inches and responsible for carrying combined sewage away from local streets to larger wastewater treatment facilities, are in need of similar upgrades to ensure their continued function.

Table 24: DWM Analysis of Sewer Adequacy in Target Wards

| Sewer Type | Existing Sewer Diameter (Inches) | Sewer Diameter Needed (Inches) | Miles of Deficient Sewers |
|--------------------|----------------------------------|--------------------------------|---------------------------|
| Local Sewer | 12 | 36 | 204.1 |
| Trunk Sewer | 42 | 360 | 52.6 |

In determining stormwater and infrastructure capacity, the City utilizes a "5-year storm" benchmark when identifying sewer lines in need of repair or expansion. A 5-year storm is a storm event with a 20% chance of occurring in a given year; any sewer line that is unable to withstand a 5-year storm would be a candidate for replacement.

To ensure these wards can withstand the next 5-year storm without severe damage to homes and other community infrastructure, DWM estimates that 35% of local sewers and 30% of trunk sewers will need to be replaced and expanded. Additionally, sewer pipes throughout the City accumulated hundreds of pounds of debris during the severe storms; DWM estimates that approximately 30% of the City's sewer lines should be cleaned to restore full function.

Table 25: Sewer Improvement Need Summary

| Category | Blocks/Miles Needing Rehab or Repair | Cost Per Unit | Estimated Cost |
|--------------------------------------|--------------------------------------|-----------------|-------------------------|
| Local Sewer Improvements | 71.4 Miles | \$8,500,000.00 | \$606,900,000.00 |
| Trunk Line Sewer Improvements | 15.8 Miles | \$19,000,000.00 | \$300,200,000.00 |
| Total | - | - | \$907,100,000.00 |

In July 2024 (DR-4819-IL), the primary cause of damage was high speed winds and tornadoes in the region⁵². The majority of 311 reports in July 2024, totaling nearly ten thousand, were regarding fallen trees and wires.

*Table 26: OEMC Storm Complaints
(Building Violations, Street Light and Traffic Signal Out, Tree Emergency and Debris Clean Up)*

| FEMA Declaration Number | Number of Storm-Related Complaints | Number of Complaints in West Side Wards | Percentage of Reports in West Side Wards |
|------------------------------|------------------------------------|---|--|
| 4819 (September 2024) | 9,699 | 1,173 | 12.09% |

Removing debris and repairing service lines is critical to preventing further damage and injury while continuing to deliver necessary services to Chicago's residents. After immediate needs were addressed, the City completed another assessment of total estimated infrastructure damages for the storm events in July 2024 (FEMA DR-4819-IL). **Table 27** represents the initial damage assessment cost estimation, totaling \$1.6 million across categories.

Table 27: OEMC Infrastructure Damage Estimated Costs (DR-4819)

| Cost Category (DR-4819-IL) | Cost | Resiliency Factor (30%) | Increased Costs Factor (26.9%) | Federal Share | Local Share (Unmet Need) |
|--|---------------------|-------------------------|--------------------------------|---------------|--------------------------|
| Category A - Debris Removal | \$ 2,091,867 | \$ - | \$ - | \$ - | \$ - |
| Category B - Emergency Protective Measures | \$ 45,181 | \$ - | \$ - | \$ - | \$ - |
| Category C - Roads and Bridges | \$ 297,153 | \$ 386,298 | \$ 490,213 | \$ - | \$ 490,213 |
| Category D - Water Control Facilities | \$ 81,186 | \$ 105,542 | \$ 133,932 | \$ - | \$ 133,932 |
| Category E - Public Buildings and Contents | \$ 79,455 | \$ 103,292 | \$ 131,077 | \$ - | \$ 131,077 |
| Category F - Public Utilities | \$ 297,153 | \$ 386,298 | \$ 490,213 | \$ - | \$ 490,213 |
| Category G - Parks, Recreation, and Other Facilities | \$ 203,119 | \$ 264,054 | \$ 335,085 | \$ - | \$ 335,085 |
| | \$ 3,095,112 | \$ 1,245,484 | \$ 1,580,519 | \$ - | \$ 1,580,519 |

Costs per category consist of regular and overtime labor, equipment, materials, and contracts.

⁵² [Derecho Produces Widespread Wind Damage and Numerous Tornadoes](#) National Oceanic and Atmospheric Administration 2024.

2.4 Economic Revitalization Unmet Needs Assessment

2.4.1 Summary of Unmet Economic Revitalization Needs

The City estimates approximately \$16.5M in unmet economic revitalization need remaining from severe storms. The City will continue to engage residents and businesses in the areas most affected by storms to determine if any additional unmet or unreported damage occurred to local businesses or to economic development projects in the affected community areas.

Table 28: Unmet Needs Summary for Economic Development

| Total Verified Loss | Total Assistance | Unmet Need |
|---------------------|------------------|--------------|
| \$31,816,589 | \$15,152,107 | \$16,664,481 |

The City's current analysis identifies a concentration of damage on the West Side, driven by the same infrastructure vulnerabilities that caused flooding in private homes. As detailed in **Section 3**, the City intends to pursue large-scale infrastructure upgrades in these communities to prevent local businesses from sustaining similar damages in future disasters. The impacts of severe storms and flooding were primarily felt in residential areas, limiting the damage to businesses and the local economy. Road closures and transportation delays were addressed and resolved by the City within two days⁵³ of the initial storm. Flooding led to short-term impacts to economic activity, including the NASCAR Cup Series in Grant Park⁵⁴, but most business operations and events generally resumed as planned within two days of the storm.

Though the majority of Chicago businesses were able to continue functioning with little interruption, small businesses on the West Side experienced disproportionately high impacts. As discussed in **Sections 2.2 and 2.3**, outdated stormwater infrastructure in these communities left businesses vulnerable to flooding and caused damage to buildings and contents.

2.4.2 Economic Revitalization Analysis

Over 1,300 small business owners applied for the Small Business Administration's (SBA) Disaster Loans in the aftermath of these severe storms. Verified losses were highest associated with the severe flooding in July 2023.

⁵³ [Heavy rains flood Chicago roads and force a downtown street race to be cut short](#) NPR 2023.

⁵⁴ [NASCAR Fans Brave Rain-Soaked Chicago Weekend to Watch Shortened – And Pricey – Grant Park Races](#) Block Club Chicago 2023.

Table 29: SBA Business Loan Applications⁵⁵

| FEMA Declaration Number | Loan Applications | Loans Awarded | Average Verified Loss |
|------------------------------|-------------------|---------------|-----------------------|
| 4728 (July 2023) | 344 | 169 | \$50,485.75 |
| 4749 (September 2023) | 573 | 47 | \$14,245.60 |
| 4819 (September 2024) | 446 | 37 | \$14,095.88 |
| Total | 1,363 | 253 | \$23,343.06 |

As of April 2025, approximately \$15M in SBA loans have been provided to small business owners in Chicago. SBA reported an additional \$163K in insurance payments were provided to impacted business owners.

Table 30: SBA Business Loan Awards⁵⁶

| FEMA Declaration Number | Total Verified Loss | Current Loan Amount | Insurance Total |
|------------------------------|------------------------|------------------------|---------------------|
| 4728 (July 2023) | \$17,367,096.96 | \$9,873,200.00 | \$38,800.00 |
| 4749 (September 2023) | \$8,162,728.60 | \$3,157,200.00 | \$60,226.58 |
| 4819 (September 2024) | \$6,286,763.66 | \$1,958,700.00 | \$63,981.20 |
| Total | \$31,816,589.22 | \$14,989,100.00 | \$163,007.78 |

According to data shared to the City from the SBA, there are ongoing efforts to review and award loans to impacted residents, especially for damage sustained in July 2024. The City will continue to update its assessment as data is updated by SBA to ensure an accurate review of economic impact.

In addition to the impact to business owners, some Chicago residents experienced disruptions in employment. A total of 217 unemployment claims were submitted via the Disaster Unemployment Assistance Program⁵⁷ in response to the three applicable disasters, with more than half of the claims resulting from storms and flooding in July 2023 (DR-4728-IL). Applicants in total received \$158K in compensation for disaster-

⁵⁵ SBA Home and Business Disaster Loan Data. U.S. Small Business Administration (SBA), shared with the City of Chicago, 2025.

⁵⁶ SBA Home and Business Disaster Loan Data. U.S. Small Business Administration (SBA), shared with the City of Chicago, 2025.

⁵⁷ [Disaster Unemployment Assistance \(DUA\) Data Downloads](#) US Department of Labor Employment & Training Administration 2025.

driven loss of income. Most of the disaster-related impact on employment was short-term, with most applicants reporting losses for less than two weeks.

Table 31: Unemployment Insurance Claims⁵⁸

| FEMA Declaration Number | Total Claims | Weeks of Unemployment Compensated | Total Compensation |
|------------------------------|--------------|-----------------------------------|---------------------|
| 4728 (July 2023) | 119 | 89 | \$137,844.00 |
| 4749 (September 2023) | 10 | 0 | \$8,568.00 |
| 4819 (September 2024) | 88 | 46 | \$11,864.00 |
| Total | 217 | 135 | \$158,276.00 |

⁵⁸ SBA Home and Business Disaster Loan Data. U.S. Small Business Administration (SBA), shared with the City of Chicago, 2025.

2.5 Mitigation Needs Assessment

The Mitigation Needs Assessment (MNA) is a risk-based assessment that outlines the greatest risks the City of Chicago currently faces, and it informs how resilience and mitigation measures can be built into the City's recovery plan to protect people and communities from future harms. The MNA is based on the 2024 Cook County Multi-Jurisdictional Hazard Mitigation Plan (MJ-HMP),⁵⁹ in which the City collaborated with Cook County and local municipalities to develop a comprehensive mitigation plan for the region.

The goal of the MJ-HMP is to "identify risks and sustainable, cost-effective action to mitigate the impact of natural hazards to protect the life, health, safety, welfare, and economy of the communities of Cook County." The Cook County MJ-HMP was adopted by Chicago's City Council in January 2025,⁶⁰ making it the current FEMA-approved mitigation plan. The plan includes details regarding proposed mitigation projects to address county-wide and Chicago-specific risks and provides a framework for policymakers to prioritize projects based on their relative cost and impact.⁶¹

The MJ-HMP conducted an in-depth analysis of the potential natural hazards facing Chicago in three steps: identification of hazards, assessing the City's vulnerability to these hazards, and then determining the estimated costs of potential damages caused from a hazard. Utilizing a weighted formula, the MJ-HMP combined a hazard's likelihood, the area's vulnerability to the hazard, and the hazard's projected impact to calculate a Total Risk Score. **Table 32** provides these risk scores in comparison, with urban flooding, severe winter weather, and severe storms with high winds as the area's most significant risks.

Table 32: Cook County MJ-HMP Scores

| | Probability | Consequence Score | | | | Total Risk |
|----------------------------------|--------------------|--------------------------------|---------------------------------------|--------------------------------|-------------------|---|
| Hazard Event | Probability Factor | Sum of Weighted Extent Factors | Sum of Weighted Vulnerability Factors | Sum of Weighted Impact Factors | Consequence Score | Total Risk Score (Probability x Consequences) |
| Flood (Urban/Flash Flood) | 3 | 15 | 12 | 30 | 57 | 79 |

⁵⁹ [Cook County Multi-Jurisdictional Hazard Mitigation Plan](#) Cook County DEMRS 2025.

⁶⁰ [Adoption of Cook County Multi-Jurisdictional Hazard Mitigation Plan and associated City Annex for 2024-2029 planning cycle to maintain continued eligibility for FEMA mitigation grant assistance programs](#) City of Chicago Office of the City Clerk 2025.

⁶¹ [Cook County Multi-Jurisdictional Hazard Mitigation Plan Jurisdictional Annexes](#) Cook County DEMRS 2025.

| | Probability | Consequence Score | | | | Total Risk |
|-------------------------------------|--------------------|--------------------------------|---------------------------------------|--------------------------------|-------------------|---|
| Hazard Event | Probability Factor | Sum of Weighted Extent Factors | Sum of Weighted Vulnerability Factors | Sum of Weighted Impact Factors | Consequence Score | Total Risk Score (Probability x Consequences) |
| Severe Winter Weather: Blizzard | 3 | 15 | 16 | 24 | 55 | 77 |
| Severe Winter Weather: Snow | 3 | 12 | 16 | 21 | 49 | 70 |
| Severe Weather: High Wind | 3 | 9 | 16 | 16 | 41 | 60 |
| Flood (Ravine/Creek) | 2 | 15 | 11 | 31 | 57 | 56 |
| Severe Winter Weather: Ice Storms | 2 | 15 | 16 | 25 | 56 | 55 |
| Severe Weather: Extreme Heat | 2 | 12 | 12 | 30 | 54 | 54 |
| Tornado | 2 | 15 | 6 | 30 | 51 | 51 |
| Severe Winter Weather: Extreme Cold | 2 | 12 | 12 | 20 | 44 | 45 |
| Drought | 2 | 12 | 12 | 18 | 42 | 43 |
| Coastal/Shoreline Flooding | 2 | 12 | 6 | 23 | 41 | 42 |
| Earthquake | 2 | 9 | 16 | 16 | 41 | 42 |
| Severe Weather: Lightning | 2 | 6 | 6 | 14 | 26 | 41 |
| Severe Weather: Hail | 2 | 9 | 11 | 16 | 36 | 38 |
| Severe Weather: Fog | 2 | 9 | 6 | 14 | 29 | 32 |
| Wildfires | 2 | 6 | 6 | 15 | 27 | 30 |
| Dam and Levee Failure | 1 | 15 | 6 | 27 | 48 | 27 |

In addition to having the highest risk score, urban flooding has also historically been the most expensive type of disaster for the Chicago region. Utilizing data from the National Oceanic and Atmospheric Administration (NOAA),⁶² the MJ-HMP identified urban flooding as considerably the costliest type of natural hazard faced by Chicago and Cook County residents, causing over \$1 billion in damages since 1950.

⁶² [NOAA Datasets - Natural Hazards](#) National Oceanic and Atmospheric Administration 2025.

Table 33: Summary of Extent of Natural Hazards in Cook County

| Hazard | Total Events 1950-2023 | Total Property Damage | Total Crop Damage | Total Deaths (Direct) | Total Injuries (Direct) |
|-------------------------|---------------------------|--------------------------|----------------------|--------------------------|----------------------------|
| Drought | 19 | \$0.00 | - | 0 | 0 |
| Extreme Cold/Wind Chill | 18 | \$0.00 | - | 34 | 5 |
| Extreme Heat | 18 | \$750K | - | 36 | 0 |
| Flood: Riverine | 168 | \$7.5M | - | 2 | 0 |
| Flood: Urban | 160 | \$1.052B | - | 1 | 0 |
| Flood: Coastal | 2 | \$0.00 | - | 0 | 0 |
| Fog | 0 | \$0.00 | - | 0 | 0 |
| Hail | 577 | \$18.8M | - | 0 | 0 |
| High Winds | 68 | \$1.303M | - | 4 | 15 |
| Ice Storms | 3 | \$0.00 | - | 0 | 0 |
| Lightening | 56 | \$6.537M | - | 3 | 18 |
| Tornado | 67 | \$118.338M | - | 39 | 771 |
| Winter Storm | 46 | \$0.00 | - | 5 | 0 |
| Total | 1,202 | \$1.205B | - | 124 | 809 |

Based upon the MJ-HMP's analysis and the real-world impacts of recent disasters, the City has identified urban flooding as the greatest risk to the City's health and safety.

2.5.1 Urban Flooding Risk Analysis

Urban flooding is defined by the Urban Flooding Awareness Act⁶³ as "the inundation of property in a built environment, particularly in more densely populated areas, caused by rainfall overwhelming the capacity of drainage systems, such as storm sewers." While all of Cook County is relatively susceptible to flooding given the area's flat topography and low water table, the City of Chicago has a particularly high risk of urban or flash flooding compared to the area's surrounding cities and municipalities. Factors that increase the City's susceptibility to flooding include having higher percentages of impervious cover (i.e. pavement) and relying on combined sewer infrastructure that underperforms and in need of repair.

⁶³ [Urban Flooding Awareness](#) Illinois Department of Natural Resources 2025.

The Chicago Metropolitan Agency for Planning (CMAP)⁶⁴ maintains an Urban Flood Susceptibility Index which identifies areas most in need of critical mitigation activities based on areas most at risk of severe flooding. **Figure 19** illustrates the wide-ranging extent of Chicago's flooding susceptibility, with nearly all of Chicago scoring a 10, indicating the highest level of flood susceptibility.

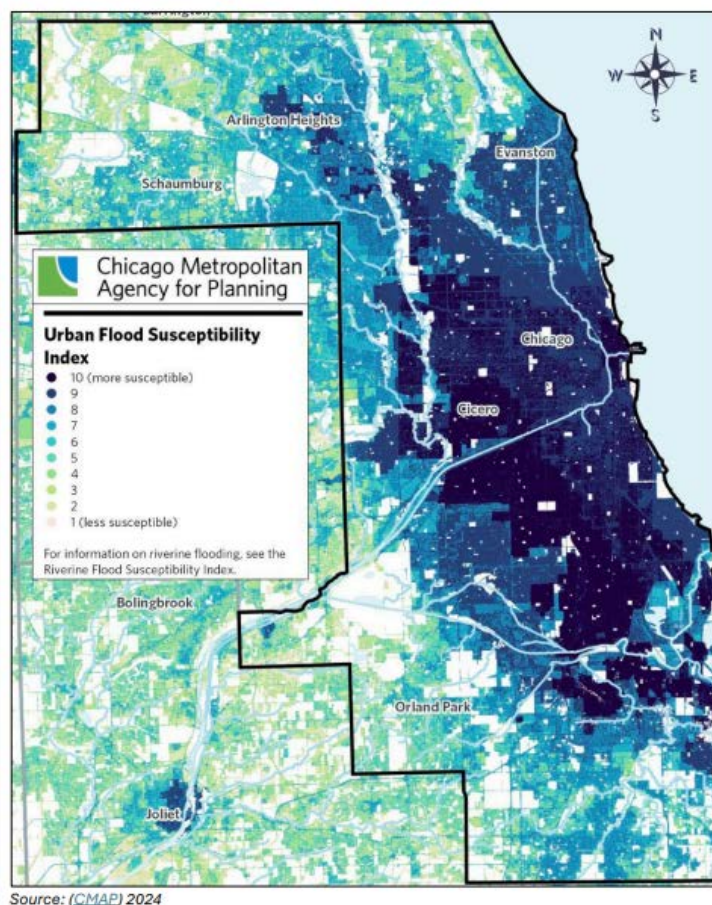


Figure 19: CMAP Flooding Susceptibility Map

A significant factor in Chicago's high risk for flooding and the high costs of the resulting damage is the age and size of City's sewer infrastructure. The Infrastructure Unmet Needs Assessment (**Section 2.3**) underscores how the smaller and older sewers on the West Side cause increased flooding probability and damage. Lack of drainage capacity means streets and homes in high-risk neighborhoods are more likely to flood during heavy rainfall, damaging property and limiting the ability of residents and first

⁶⁴ [Chicago Metropolitan Agency for Planning Urban Flood Susceptibility Index](#) Chicago Metropolitan Agency for Planning 2025.

responders to navigate the impacted areas. Standing water in flooded areas causes and exacerbates damage to roads and other critical infrastructure.

A National Weather Service report on the July and September 2023 storms⁶⁵ found that the magnitude of rainfall seen during these storms has a 0.2% chance of occurring in any given year. The likelihood of two storms of this severity happening in one year, as occurred in 2023, is even smaller at 0.04%. While all flooding events represent significant risk for people and property, urban flooding most often takes the form of a “flash flood,” which can occur within six hours of rainfall beginning and does not allow for the same kind of forecasting and prevention measures that local governments can use to monitor river flooding risk.

Recognizing the severe threats from urban flooding, the City has undertaken several mitigation-based initiatives in partnership with MWRD. MWRD has hundreds of active and completed stormwater management projects across Chicago, aiming to improve the region’s ability to withstand severe storms and mitigate potential damages. These projects range from the build-out of massive stormwater reservoirs to neighborhood permeable infrastructure projects. The first major milestone in mitigating flood risk was MWRD’s completion of the Chicago Area Waterway System (CAWS)⁶⁶ which reversed the flow of the Chicago River in 1900, built critical drainage capacity for severe storm events, and safeguarded Lake Michigan from pollution.

Supplementing the success of CAWS, and key to Chicago’s current mitigation efforts, is the Tunnel and Reservoir Plan (TARP),⁶⁷ also referred to as the Deep Tunnel Project. TARP was designed to reduce urban flooding and improve the City’s water infrastructure by building increased water drainage tunnels as well as vast, new reservoirs to withstand large influxes of water. The first phase of TARP’s construction, focusing on constructing tunnels, commenced in 1975 and was completed in 2006. TARP’s second phase is underway, with the construction of several key reservoirs expected to reach completion in 2029. From the construction completed to this day, TARP has provided immense benefits to Chicago’s communities by dramatically improving the City’s waterways and almost entirely eliminating combined sewer overflows when untreated sewage and stormwater are discharged into local waterways.

Despite the accomplishments of near combined sewer overflow elimination and mitigated flood damage, TARP faces capacity limitations. As storm severity and

⁶⁵ [The July 2 and September 17, 2023, Flash Flood Events in the Chicago Metro Area](#) National Weather Service 2023

⁶⁶ [Chicago Area Waterway System \(CAWS\)](#) Metropolitan Water Reclamation District of Greater Chicago 2025.

⁶⁷ [Tunnel and Reservoir Plan \(TARP\)](#) Metropolitan Water Reclamation District of Greater Chicago 2025.

frequency continues to increase, TARP terminal volume constraints lead to flooding as seen in the 2023 and 2024 storms. While TARP has not previously been funded with CDBG-DR funding, additional reservoirs and tunnel construction remain critical to capitalize on the historical success of the project.

The City of Chicago has also undertaken additional flood mitigation infrastructure projects to supplement the network of tunnels and reservoirs. The Albany Park Stormwater Diversion Tunnel⁶⁸ was a project funded by Chicago's 2014 CDBG-DR allocation. The Tunnel reached completion in early 2018, and it now diverts 2,300 cubic feet of water per second, preventing further flooding to the Albany Park neighborhood. These projects have already proved successful in the neighborhoods they service. During the storm events of 2023 and 2024, the neighborhoods near the Albany Tunnel experienced lower rates of flooding and associated damage compared to wards 28, 29, 30, and 37.

In addition to infrastructural drainage improvements like CAWS, Albany, and TARP, the City has also made substantial investments in permeable infrastructure projects. These include the distribution of rain barrels to private residences, increasing the prevalence of native landscaping and rain gardens, and building bioswales to collect stormwater runoff. In recent years, the City has prioritized expanding its Permeable Alley Program,⁶⁹ which seeks to rehabilitate and reintegrate Chicago's expansive 1,900 miles of public alleys. The vast majority of alleys are not connected to the City's combined sewer system, and as a result, the alleys are prone to flooding, causing damage to surrounding homes and businesses. Permeable alleys mitigate future flood damage by improving water drainage and increasing the prevalence of permeable ground.

The City has made significant progress in addressing its susceptibility to urban flooding; however, the City, and in particular the West Side, need additional mitigation investment. The TARP project is still incomplete, key infrastructure upgrades to the City's aging combined sewer system remain critical, and the City is in need of widespread expansion of permeable infrastructure projects to prevent water line overloading.

2.5.2 Mitigation Priorities

Because urban flooding is both uniquely difficult to predict and extremely costly to people and property, proactive investments in stormwater infrastructure are the City's

⁶⁸ [City of Chicago: Albany Park Stormwater Diversion Tunnel](#) Chicago Department of Transportation 2025.

⁶⁹ [City of Chicago: Permeable Alleys](#) Chicago Department of Transportation 2025.

most effective strategy to prevent future damage. The MJ-HMP⁷⁰ identifies several mitigation strategies with an estimated cost, priority, and projected impact on the City's risk of urban flooding.

Table 34: MJ-HMP Project Priorities

| Project | Description | Cost | Priority | Benefit / Impact |
|--|---|--------|----------|------------------|
| Increase Stormwater Tunnel Capacity* | Build additional 8 miles of tunnel to store stormwater and connect to TARP | High | High | High |
| Expand the Permeable Alley Program* | Fund and convert alleys to increase ground permeability, flood recovery, and mitigate damages | High | High | High |
| Drainage Study | Complete stormwater drainage study to support drainage planning | High | High | High |
| Expand Natural Public Spaces* | Increase natural public spaces, decreasing heat islands, reducing flooding, and improving air quality | High | High | High |
| Tree Canopy Expansion | Support the Our Roots Chicago project to expand Chicago's tree coverage | High | High | High |
| Upgrade Infrastructure Investments* | Take measures to upgrade public infrastructure ensuring better storm resilience: warming/cooling centers, existing resiliency sites | High | Medium | Medium |
| Maintain Existing Permeable Infrastructure | Ensure existing permeable infrastructure projects that reduce flooding and heat are funded and supported | High | Medium | Medium |
| Home Repair Program* | Support program to retrofit homes to improve resilience, including leak detection and repair, foundation cracks, downspout disconnection, and other flooding remedies | Medium | Medium | High |

*To be funded with Disaster Recovery Action Plan; see **Section 3** for the Proposed Use of Funds

These established priorities informed the City's allocation of its CDBG-DR funds and ensured the City prioritized funding projects with proven impacts and with the greatest likelihood of success.

⁷⁰ [Cook County Multi-Jurisdictional Hazard Mitigation Plan](#) Cook County DEMRS 2025.

2.5.3 Summary of Unmet Mitigation Needs

The MJ-HMP Project Priorities Table (**Table 34**) highlights the wide-ranging and highly impactful mitigation projects in need of funding. For most proposed activities in the plan,⁷¹ additional progress cannot be made without additional capital. Of the nine projects included in the table, seven have a “high” cost rating, meaning the existing funding will not cover the cost of building or implementing the project. The “high” cost rating reflects both projects that require high up-front costs to implement (ex. TARP) and those with a smaller per-unit cost but a greater amount of area to cover (ex. tree canopy). Permeable alleys, for example, are currently funded at one per ward (of a total of 50) per year; important progress, but insufficient to meaningfully mitigate flood risk when Chicago has over 1,900 miles of alleys. With the current funding available and the amount of alleys in need of conversion, it will be 30 years before there are sufficient Permeable alleys. As such, the need for additional program funding is dire. While these types of investments rely on wide-ranging capital support, the City’s sewer and stormwater infrastructure require these investments for the safety and stability of all future Chicagoans.

⁷¹ [Cook County Multi-Jurisdictional Hazard Mitigation Plan](#) Cook County DEMRS 2025.

3 PROPOSED USE OF FUNDS

The City's proposed use of CDBG-DR funds was informed by its findings in the Unmet Needs Assessment, the priorities outlined in the Mitigation Needs Assessment, and collaboration with residents of the most impacted areas. Funds will be combined with local resources and used as part of a larger strategy for necessary expenses related to disaster relief and long-term recovery from storms in July 2023, September 2023, and July 2024. The proposed programs and the amount of funds allocated reflect the City's intention to use its CDBG-DR funds to effectively and efficiently address urgent unmet need. As part of its programming, the City has ensured compliance with designated caps or targets of this funding, which are:

- 5% cap of total funding to program administrative costs for lifetime of the grant
- 15% cap of total funding to Planning
- 15% cap on non-exempt Public Services
- 15% required mitigation set-aside for funding, as required by the Disaster Relief Supplemental Appropriations Act of 2021

3.1 Allocation and Award Caps

Table 35: Proposed Allocations Across Award

| Eligible Cost Category | Unmet Need | % of Unmet Need | % of Funding to be Expended in MID | CDBG-DR Allocation Amount | % of CDBG-DR Allocation | Local Funding |
|-------------------------------|-----------------------|-----------------|------------------------------------|---------------------------|-------------------------|----------------------|
| Administration | \$ - | 0% | 0% | \$ 21,330,400 | 5% | \$ - |
| Planning | \$ - | 0% | 0% | \$ - | 0% | \$ - |
| Housing | \$ 34,217,895 | 4% | 0% | \$ - | 0% | \$ 40,000,000 |
| Infrastructure and Mitigation | \$ 919,462,768 | 94% | 100% | \$ 405,277,600 | 95% | \$ 52,013,087* |
| Economic Revitalization | \$ 16,664,481 | 2% | 0% | \$ - | 0% | \$ 5,000,000 |
| Public Services | N/A | 0% | 0% | \$ - | 0% | \$ - |
| Total | \$ 970,345,144 | 100% | 100% | \$ 426,608,000 | 100% | \$ 97,013,087 |

*Funding earmarked from City capital funds and other local partners depends on project locations, project eligibility, and funding availability.

3.1.1 Eligible and Ineligible Activities

3.1.1.1 Eligible Activities

CDBG-DR funding supports disaster relief and recovery, encouraging improvements and repairs determined by each eligible city and community consensus. Allowable activities are authorized under Title I of the Housing and Community Development Act of 1974 (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation of risk associated with these activities.

All activities funded by the CDBG-DR program must:

1. Address the impact of the 2023 and 2024 storm events.
2. Be a CDBG-eligible activity under section 105(a) of the HCDA of 1974 (42 U.S.C. 5305(a) or be eligible under a waiver or alternative requirement); and,
3. Must meet a national objective.

The City has also received a CDBG-DR mitigation set-aside for the recovery efforts from the storm events of 2023 and 2024. HUD encourages grantees to incorporate mitigation measures and activities into all funded activities; however, projects funded by the mitigation set-aside do not require a “tie-back” to a qualifying storm event.

All activities funded by the CDBG-DR mitigation set-aside must:

1. Meet the definition of mitigation activities as defined in the Universal Notice;
2. Address current and future risks identified in the mitigation needs assessment of the MID areas;
3. Be a CDBG-eligible activity under Title I of the HCDA; and
4. Meet a national objective.

3.1.1.2 Ineligible Activities

Unless explicitly allowed by waiver and alternative requirement in the Universal Notice, CDBG-DR funds may not be used for funding any activity that is not authorized under Section 105(a) of the HCDA (42 U.S.C. 5305(a)), unless explicitly allowed by waiver and alternative requirement in the Universal Notice or the AAN.

Examples of ineligible activities include:

- Assistance for second homes;
- Assistance to casinos, sports arenas, or concert venues;
- Activities without a clear connection to disaster impacts;
- Activities outside of the MID areas.

3.1.2 CDBG-DR Program National Objectives

The City of Chicago has designed this CDBG-DR program to remain compliant with the national program objectives set by HUD. To this end, the City's CDBG-DR funded activities will address one of three named HUD national objectives:

1. Benefit to LMI Persons;
2. Aid in the prevention or elimination of blight or slums; and
3. Meet a need having a particular urgency (referred to as urgent need).

3.1.3 Low-to-Moderate Income Expenditure Requirement

In compliance with grant requirements, at least 70% of the City's CDBG-DR funds will benefit LMI persons or households. There are four mechanisms to track the percentage of funds spent benefiting LMI individuals and communities:

- LMI Area Benefit Activities: Activities designed to benefit a residential neighborhood with at least 51% LMI persons
- LMI Clientele: Activities where at least 51% of beneficiaries are LMI
- LMI Housing: Building, providing, or improving structures that will be occupied by at least 51% LMI households
- Job Creation or Retention: Creation or retention of jobs that will be made available to at least 51% LMI persons

The City will use HUD-determined income limits⁷² to establish LMI status.

3.1.4 Obligation and Expenditure of Funds

After consulting with impacted communities and holding a 30-day public comment period, the City of Chicago will submit its Action Plan to HUD for review. Once the Action Plan and associated certifications are approved, HUD and the City will sign a grant agreement to obligate the City's allocation.

The City will administer its CDBG-DR funds in compliance with all applicable laws, including:

- Section 109 of the HCDA, 42 U.S.C. 5309;
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;
- Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.;

⁷² [Income Limits](#) HUD 2025.

- Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act), 42 U.S.C. 3601 – 19;
- Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794;
- The Americans with Disabilities Act of 1990, 42 U.S.C. 12131 et seq.; and
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).

DRAFT

3.2 Connection to Unmet Need

The City of Chicago's allocation of approximately \$427M through this program is strategically designed to address the most pressing needs identified in the Most Impacted and Distressed (MID) areas. The unmet needs assessments highlighted that sewer infrastructure issues are the primary cause of household flooding and resulted in a significant number of resident alerts in these types of disasters. Consequently, a substantial portion of the CDBG-DR funds will be dedicated to infrastructure projects, particularly those aimed at upgrading and maintaining sewer systems to ensure the City and its housing stock can better withstand the severe storms of the future. These projects will directly address the root causes of flooding, thereby reducing the frequency and severity of household disruptions in LMI communities. The emphasis on infrastructure, particularly sewer systems, is justified by the direct correlation between sewer infrastructure issues and the high incidence of household flooding and 311 alerts. This targeted approach ensures that the most critical needs are addressed first, providing immediate relief and long-term benefits to the affected communities.

While infrastructure is the primary focus of the CDBG-DR award, the City also recognizes the importance of addressing housing needs and economic revitalization by braiding local funding sources with its CDBG-DR award. The City is planning to invest \$97M in local dollars to support additional infrastructure upgrades as well as additional recovery activities such as home repairs and storefront activations.

Throughout each project, the City is incorporating hazard mitigation measures by investing in flood mitigation, such as stormwater management systems and permeable infrastructure, to address the primary risks identified in its mitigation needs assessment. As identified by the Cook County MJ-HMP, urban flooding will be the most frequent, most damaging, and most expensive hazard facing the City of Chicago. Therefore, the mitigation projects identified for funding address this immense risk. To this end, the City is enhancing the resilience of critical infrastructure, including water and sewage systems, to withstand such extreme weather events. While these mitigatory interventions are key to withstanding future storms, the City also recognizes the need to support citizens in their individual homes and businesses. To support private properties that are vulnerable, the City is offering flood mitigation resources, helping homeowners implement protective measures and reduce future disaster impacts.

As described in **Section 1.2.1**, the City intends to focus its CDBG-DR funded activities on the West Side, in wards 28, 29, 30, and 37. These wards are both the areas with the greatest proportion of damage received in the qualifying disasters; concentrating CDBG-DR funding in these four wards will ensure the City's compliance with HUD directives.

While the City does intend to focus its attention on these communities, residents, and LMI individuals, the City will make exceptions to maximum award amounts, when necessary, to comply with federal accessibility standards.

Due to the nature of the City's planned CDBG-DR investments, the City does not anticipate the potential for displacement of persons or entities as a result of funded projects. Activities will take place primarily in publicly managed streets or alleyways with no anticipated impact to the habitability of nearby homes. The City recognizes the importance of maintaining community stability and will engage with affected communities early in the planning process to ensure they are aware of upcoming construction and that disruptions are minimized.

In the event that displacement becomes unavoidable, the City will comply with all applicable laws and guidelines, including the Uniform Relocation Act and its Residential Anti-Displacement and Relocation Plan, to minimize impact and support affected individuals. The City will provide comprehensive assistance to ensure a smooth transition for affected persons or entities, including but not limited to relocation assistance, counseling, and reasonable accommodations. The City will collaborate with local disability advocacy groups to ensure that the needs of persons with disabilities are adequately addressed. These measures are essential for maintaining community stability and supporting the well-being of all residents throughout the implementation of CDBG-DR funded projects.

The City of Chicago is committed to ensuring that Chicagoans benefit fairly from CDBG-DR funds by prioritizing infrastructure improvements and mitigation activities in communities with the greatest need. All projects and programs will be designed and managed to allow for participation of all impacted residents, including individuals with disabilities and the elderly. These efforts focus on addressing disparities identified in the unmet needs and mitigation needs assessments, particularly for those most impacted. The City will engage with these communities through advisory groups and support services to ensure that voices are heard. Part of this engagement is the City's consistent collaboration with Long-Term Recovery Groups (LTRGs), organizations comprised of faith-based, non-profit, government, and business entities and individuals. LTRGs operate within communities to assist families and individuals recovering from disasters while providing reassurance that community-specific needs are being addressed. The City has held two workshops with LTRGs including South Suburban Recovery Group, Southside Resilience and Recovery Coalition, and the West Side Long Term Recovery Group. The purpose of these workshops is to build foundational relationships between government agencies and LTRGs, increase awareness of LTRG efforts in flood response and recovery, enhance knowledge of projects targeting

affected areas, and improve overall communication between communities and government entities for future flood control projects and collaboration. To ensure transparency and awareness with the public, the City will continue to update the disaster recovery site with critical updates, changes, and progress on the CDBG-DR program. This comprehensive approach ensures that those most impacted receive the necessary resources to recover and thrive.

DRAFT

3.3 Program Details

3.3.1 Administration

The City of Chicago's Office of Budget and Management (OBM) allocates \$21,330,400 of the total CDBG-DR award for program administrative costs associated with the life of the grant, allowable per HUD's requirements under the Universal Notice and Notice CPD-2023-06.⁷³ The City advises HUD that it will seek to recover pre-award and/or pre-application costs related to administrative expenses consistent with the guidance provided by Section III.B.14. of the Universal Notice. Such costs may be incurred back to the date of the respective presidential disaster declaration date.

3.3.2 Planning

At this time, the City does not intend to allocate any CDBG-DR funds for planning activities.

3.3.3 Housing

After assistance provided by FEMA, SBA, and private insurance, the remaining unmet need for housing is relatively low compared to infrastructure needs. Flood vulnerability is largely driven by infrastructure challenges rather than individual housing deficiencies, leading the City to conclude that housing programming is best serviced by other streams of funding beyond this CDBG-DR allocation. To address the remaining need for housing repairs, the City is committing \$40M in local capital funds to the Home Repair Program to provide repairs to up to 1,600 residents, including those with remaining damage from any of the storms in 2023 and 2024. This investment is in addition to a \$3.5M downpayment the City made towards home flood damage repairs out of its FY 2024 Operating Budget.

3.3.4 Infrastructure and Mitigation Program

Table 36: Infrastructure and Mitigation Program

| Program | Infrastructure and Mitigation Program |
|----------------------------------|--|
| CDBG-DR Allocation Amount | \$405,277,600 |
| Eligible Activities | Acquisition of Real Property, 24 CFR 570.201(a), HCDA Section 105(a)(1) Public Facilities and Improvements, 24 CFR 570.201(c), HCDA Section 105(a)(2) |

⁷³ [Final CPD Notice on Allocating Costs between PACs ADCs and Planning Costs for CDBG-DR Grantees \(004\)](#) HUD 2023.

| Program | Infrastructure and Mitigation Program |
|---|---|
| | Clearance, Demolition, Rehabilitation, and Reconstruction of Buildings, 24 CFR 570.201 (d), HCDA Section 105(a)(4) Payment of Non-Federal Share, 24 CFR 570.201(g), HCDA Section 105(a)(9) Relocation Assistance, 24 CFR 570.201(i), HCDA Section 105(a)(11) |
| National Objective(s) | Low- and Moderate-Income Area Benefit (LMA) 24 CFR 570.208(a)(1), FR-6489-N-01 III.D.6.e Limited Clientele (LMC) 24 CFR 570.208(a)(2) Urgent Need FR-6489-N-01 III.B.2. |
| Lead Agency and Distribution Process | The Office of Budget and Management (OBM) will oversee the program with three City Departments, Department of Water Management (DWM), Department of Transportation (CDOT), and Department of Planning and Development (DPD), leading implementation with contractor support and local government partnerships. |
| Program Description | The Infrastructure and Mitigation Program will provide funding for infrastructure projects that support disaster recovery and long-term community resilience. |
| Eligible Geographic Area | The City of Chicago |
| Other Eligibility Criteria | The City will prioritize blocks located in LMI areas as part of HUD's directive to spend 70% of funds benefiting LMI individuals and households. |
| Maximum Amount of Assistance per Beneficiary | N/A |
| Maximum Income of Beneficiary | N/A |
| Mitigation Measures | Improvements to wastewater systems will reduce the risk of future overflow and flooding during heavy rainfall. |
| Reducing Impediments for Assistance | The City is committed to involving its residents in making decisions about how to invest in the future of its neighborhoods. Collaboration with community-based organizations and Long-Term Recovery Groups (LTRGs) will also continue, reflecting the City's commitment to involving impacted communities in discussions and plans for long-term flood resilience. |

Program Description

The Infrastructure and Mitigation Program will provide funding for infrastructure projects that support disaster recovery and long-term community resilience. Eligible activities may include both recovery-focused improvements and mitigation components. Projects may be implemented as stand-alone initiatives or in coordination

with other funding sources. The program is intended to address critical infrastructure needs in impacted areas and support the restoration of essential community services.

The Infrastructure and Mitigation Program is designed to support targeted public infrastructure improvements that align with the City's housing recovery and resilience strategy following the 2023 and 2024 storms and the unmet needs and mitigation assessments provided in this plan. The extraordinary impacts of these storms placed significant strain on public systems serving residential areas, including in neighborhoods with concentrations of low- to moderate-income (LMI) households. In order to ensure long-term recovery and strengthen future resilience, infrastructure systems must be enhanced to support the demands of storms of similar magnitude.

Investments through this program will focus on restoring, strengthening, and improving infrastructure necessary to stabilize residential communities, protect reoccupied homes, support new housing development, and promote sustained neighborhood viability. Enhancing the resiliency of utility assets and related infrastructure will improve safety for residents, protect critical housing investments, and contribute to a stronger, more durable recovery.

The City aims to fund infrastructure projects that support Chicago's broader recovery by reducing flood risks, enhancing infrastructure resilience, and strengthening the wastewater system. These projects will focus on improving the City's capacity to manage stormwater and prevent flooding.

Eligible activities may include stormwater system upgrades and other critical infrastructure enhancements that directly enable the restoration, development, or protection of housing. Projects may be identified through the City's disaster recovery planning process, unmet needs assessments, or other locally adopted recovery and resilience strategies.

During the action plan process alone, the City has already identified potential projects to improve up to 233 city blocks of infrastructure in the most concentrated damage areas on the West Side. These projects include but are not limited to local sewer improvements, trunk line sewer improvements, combined sewer overflow tanks (a.k.a. wing storage), permeable alleys, permeable public outdoor plazas, and property flood mitigation improvements such as downspout disconnections, rain barrels, and rain gardens.

While some projects will incorporate mitigation measures to reduce future hazard risks—and may qualify under the mitigation set-aside—the program's primary focus is on addressing infrastructure needs essential to residential recovery. All activities will comply with CDBG-DR requirements and will not duplicate or supplant other available funding sources.

Connection to Disaster Recovery

The flooding caused from the 2023 and 2024 storms severely compromised Chicago's combined sewer system. The intense storms overwhelmed the system, leading to backups and damage to homes and businesses. To fully recover from these storms, and to restore the full capacity of the sewer system, the City intends to undertake sewer grid cleanings in the most affected communities.

The replacement of sewer lines improves the City's ability to handle an increased volume of stormwater, reducing the risk of future overflow and flooding during heavy rainfall. Older sewer lines are prone to frequent backups and clogs due to corrosion, debris buildup, and tree roots causing sewage to overflow into homes and residential areas, as seen during severe storms in July and September 2023. These overflow events can pose lasting health risks to residents through exposure to harmful bacteria and pathogens, as well as contaminating drinking water supplies⁷⁴. Undersized sewer lines also have reduced capacity and efficiency, contributing to the occurrence of backups and flooding during heavy rainfall. These older systems also require more frequent maintenance and repairs, leading to an overall higher cost for the City over time. The replacement of City sewer lines serves to alleviate the impact of this damage by improving the capacity of stormwater handled by these sewer lines and increase the resilience to ensure that the system can withstand extreme rainfall and other weather events in the future. DWM will also resurface the affected roads after sewer installation is complete, repairing the damage from flooding, standing water, and debris. Additionally, the lead service lines are replaced with copper lines, ensuring access to safe drinking water.



Figure 20: Excavation of Sewer Lines



Figure 21: Construction of Sewer Lines

Additional wing storage will provide additional retention capacity to help reduce overflow during extreme rainfall and urban flooding. These projects also offer the City the chance to provide collector streets with holding tanks, which provide surrounding

⁷⁴ [Sanitary Sewer Overflow \(SSO\) Frequent Questions](#) US EPA 2025.

streets relief from flooding. In the process of installing these new tanks, faulty infrastructure may also be identified leading to needed repairs.

Permeable alleys prevent future flooding through the use of permeable pavement and upgrades to existing alleys in order to divert rainwater to the ground and underwater trench system rather than the City's sewer and stormwater systems. In areas lacking permeable alleys, stormwater is unable to permeate the ground, leading to high surface runoff and residents consistently reporting basement flooding and associated issues. This overflow of stormwater runoff can also carry pollutants like heavy metals, trash, and oils directly into flooded areas and local waterways.

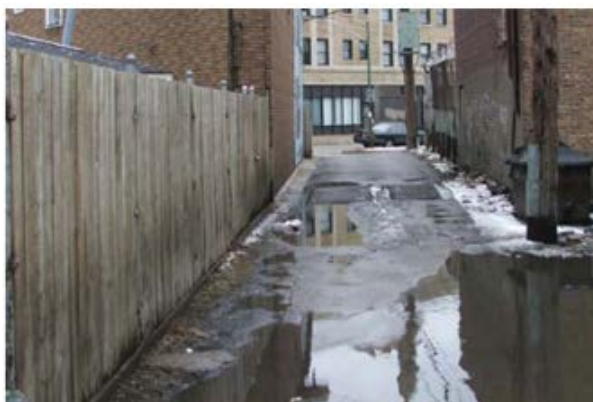


Figure 22: Impermeable Alley

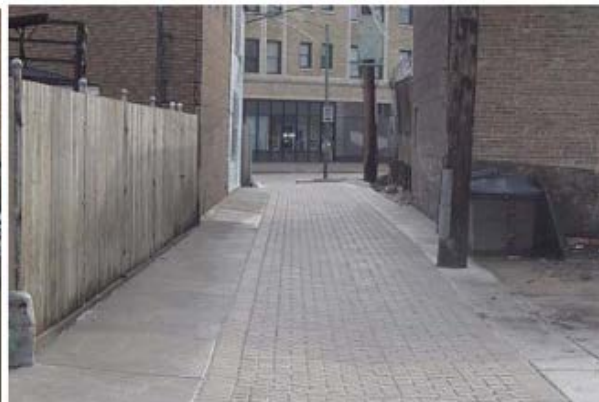


Figure 23: Permeable Alley

Connection to Mitigation

This program is designed to support long-term infrastructure mitigation projects that reflect the unique hazards, vulnerabilities, and disaster impacts within the City of Chicago. Projects will promote resilience through sustainable design, integration of mitigation measures, and strategies that reduce future disaster risk.

Eligibility Criteria

Eligible projects must be:

- Public infrastructure designed to address a clearly defined unmet or mitigation need, including housing impacted by the qualifying disaster and at-risk for future flooding
- Supported by documentation of unmet or mitigation need and not duplicative of other available funding sources
- Able to meet a HUD national objective (LMA or UN)
- Other specific criteria may be included in the program guidelines

Program Priorities: The City will establish prioritization criteria in the program guidelines, which may include:

- **Storm-Related Service Disruptions:** Infrastructure that remained intact from the disasters, but experienced reduced performance due to storm stress.
- **Indirect Operational Impacts:** Systems affected by debris, power loss, or stormwater infiltration that limited functionality during or after the storms.
- **Design Improvement Opportunities:** Infrastructure where post-storm conditions revealed areas for enhancement to better withstand future events.
- **Recovery-Critical Systems:** Infrastructure whose service interruptions delayed emergency response or housing recovery efforts.
- Other priorities as described in the program guidelines that serve to meet the objectives of the program.

3.3.5 Economic Revitalization

The City's analysis of business damage and employment income loss showed that the approximately \$16.5M in unmet need was driven largely by deficiencies in area infrastructure and intends to respond to this need with the programming described in **Sections 3.3.4 and 3.3.7**. The City has also allocated \$5.0M in local funding towards the Department of Business Affairs and Consumer Protection's Storefront Activation Program to activate up to 50 businesses. The Storefront Activation Program is a comprehensive initiative designed to revitalize commercial corridors by activating vacant storefronts and providing support to small businesses, with the goal of boosting local economies and enhancing neighborhood vibrancy. The program offers rent-free space and no-cost technical/operational assistance to entrepreneurs, enabling them to restart or expand operations in flood-affected areas.

3.3.6 Public Services Programs

Public Services programming typically funds housing support, economic services, or grants for eligible public and non-profit organizations. The City has determined that public services programs will not be funded by this CDBG-DR allocation due to limited housing and economic revitalization needs.

4 GENERAL REQUIREMENTS

4.1 Citizen Participation

The purpose of the Citizen Participation Plan is to outline the policies and procedures the City of Chicago will utilize to ensure compliance with public engagement requirements from HUD. This plan aims to involve Chicagoans from across the City in the decision-making processes for how community investments will be made with CDBG-DR funding. Additionally, the plan ensures transparency and public input during all stages of the funding process. The policies outlined in the following sections build from the extensive citizen and community engagement policies that are already in practice by the City of Chicago.

Per HUD Guidelines, the City will ensure all CDBG-DR targeted communities, in particular Low- and Moderate-Income (LMI) and Most Impacted and Distressed (MID) areas, are provided meaningful opportunities to participate in the planning process. The outlined Citizen Participation Plan is drafted to meet the requirements of CDBG-DR funding as outlined in 24 CFR 91.115 and 24 CFR 570.486.

The City of Chicago believes that citizen participation and planning are central to the success of community development efforts. The City is committed to involving its residents in making decisions about how to invest in the future of its neighborhoods. Collaboration with community-based organizations and Long-Term Recovery Groups (LTRGs) will also continue, reflecting the City's commitment to involving impacted communities in discussions and plans for long-term flood resilience. Through the grant planning process detailed below, Chicagoans can make significant contributions to further enhance the ongoing collaboration between City government and key community-based partners.

To view additional CDBG-DR related documentation, or for additional information on the City of Chicago's CDBG-DR program, please visit the City of Chicago Office of Budget and Management CDBG-DR Program website.⁷⁵ This website will be updated regularly as recovery activities progress to reflect the most up-to-date information on grant administration, program policies and procedures, procurement notices and contracts, citizen feedback, and performance reports.

⁷⁵ [City of Chicago: CDBG-DR](#) Chicago Office of Management and Budget 2025.

4.1.1 Consultation of Developing the Action Plan

Broad public participation in the action plan development process ensures that diverse viewpoints about the City's needs are represented in the projects that receive funding. Throughout the planning process, key stakeholders and community organizations will be involved in providing key input, sharing data, disseminating information about the Plan, supporting stakeholder outreach, and reviewing the proposed final Action Plan.

An updated list of the community stakeholders will be included in the finalized Action Plan. This list will include federal, state and local government agencies, representatives from the private sector, critical emergency relief services, and key community organizations and non-profits. Once the Action Plan is finalized, the results will be disseminated in a table similar to the below, with initial consultations detailed below:

Table 37: Stakeholder Consultation Summary

| Partners Consulted | Describe Consultation |
|-------------------------------|---|
| Federal Partners (FEMA, SBA) | The City of Chicago has executed the required data-sharing agreements with SBA to evaluate economic unmet need and facilitate future efforts to prevent duplication of benefits. |
| Local/State Government | <p>The City of Chicago engaged Cook County, which also received a CDBG-DR allocation for these storms, to coordinate programming approach and ensure collaboration for infrastructure and mitigation activities. The City will continue to collaborate with overlapping or neighboring jurisdictions to ensure infrastructure investments are coordinated and support regional planning.</p> <p>The Department of Water Management (DWM) coordinates closely with the Metropolitan Water Reclamation District of Greater Chicago regarding ongoing operations and disaster response. DWM has consulted with MWRD regarding the City's planned CDBG-DR investments to ensure no duplication of efforts and that project locations are chosen with the maximum potential benefit to area residents.</p> |
| Nongovernmental organizations | The City of Chicago is collaborating with several Long-Term Recovery Groups (LTRGs) to connect survivors of disasters to organizations and resources that offer assistance such as food, clothing, financial aid, and other support. Two workshops have been hosted to ensure affected individuals are aware of these resources and how to access them. The LTRGs include South Suburban Recovery Group, Southside |

| Partners Consulted | Describe Consultation |
|---|--|
| | Resilience and Recovery Coalition, and West Side Long Term Recovery Group. |
| Private sector | The City has not yet consulted Private Sector partners at the time of this draft. |
| State and local emergency management agencies that have primary responsibility for the administration of FEMA funds | Chicago's Office of Emergency Management (OEMC) and Communications is the lead department for disaster response and coordination with FEMA. The Office of Budget and Management has communicated regularly with OEMC regarding disaster impacts, response, and ongoing needs since July 2023, and worked with OEMC to ensure that this Action Plan includes all applicable information. |
| Agencies that manage local Continuum of Care | The Office of Budget and Management has consulted with the City's Department of Family and Support Services (DFSS) to assess potential disaster impacts on emergency shelters and individuals experiencing homelessness. DFSS is the City's primary liaison to Continuum of Care agencies and gathered data around shelter occupancy rates during the timeframes of each storm to determine if shelter capacity was sufficient to respond to natural disasters. Based on the shelter bed occupancy data reported daily, there was not a significant uptick in shelter occupancy during the storm dates – overall, occupancy rates remained stable. These inputs were incorporated into the Housing Unmet Needs Assessment. |
| Public Housing Agencies | The Office of Budget and Management is consulting with the Chicago Housing Authority to assess disaster impacts on public housing. |
| HUD-approved housing counseling agencies | The City has not yet consulted HUD-approved counseling agencies at the time of this draft. |
| State Housing Finance Agencies | The City has not yet consulted State Housing Finance Agencies at the time of this draft. |
| Other Stakeholders | |

4.1.2 Public Notice & Comment

The City's Citizen Participation Plan includes reasonable and timely access for all public notice, appraisal, and comment on the planned activities utilizing CDBG-DR funding. In addition to consulting with stakeholders across the private and public sectors, the City will also invite public comments on the proposed Action Plan and any substantial

amendments for a minimum of 30 calendar days. Each plan and amendment that is open for public comment will be posted in a prominent and accessible manner on the City of Chicago's CDBG-DR website linked above.

Public comments on the Action Plan or substantial amendments, as well as any other comments or citizen complaints, may be shared as follows:

- Electronically via [Microsoft Form](#)
- Written comments may be mailed to: Office of Budget and Management, City Hall, 121 N. LaSalle Street Room 604, Chicago, IL 60602
- By telephone by calling: (312) 744-9745

At the end of the public comment period, all comments – both written and oral – will be reviewed by the City. A summary of the public comments, the City's response, and an identification of Action Plan updates made from the comments will be included in the finalized Action Plan and on the City's CDBG-DR website.

4.1.3 Public Hearings

Per HUD's regulations for CDBG-DR funding, the City must hold at least two public hearings during the 30-day public comment period for the Action Plan. For each public hearing, the City will convene at accessible locations located on the West Side in proximity to potential and actual beneficiaries of the CDBG-DR funding.

- **Public Hearing #1: Wednesday, May 14th, 2025**
 - **Time:** 6:00PM – 8:00PM
 - **Location:** Zoe Life Ministries international; 5151 W. Madison Street, Chicago, IL 60644
- **Public Hearing #2: Friday, May 16th, 2025**
 - **Time:** 6:00PM – 8:00PM
 - **Location:** International Sports Center; 1841 N. Laramie Avenue, Chicago, IL 60639

The City will ensure attendees are able to ask questions in real time, with answers coming directly from the City to all attendees. In line with the City's efforts to ensure the Action Plan development process is accessible to all Chicagoans, the sections below outline the policies and practices in place for holistic community participation.

4.1.3.1 Accessibility of Public Hearings

The City of Chicago is committed to hosting public hearings that foster meaningful involvement from all residents. For the City's in-person public hearing, the City will convene at an accessible time and location in a HUD-identified MID area, in proximity to

potential and actual beneficiaries of the CDBG-DR funding. The City will take appropriate steps to ensure effective communications for individuals with disabilities, as required by 24 CFR 8.6 and the Americans with Disabilities Act. For questions regarding the event or inquiries regarding hearing accessibility, please contact OBM at grantsupport@cityofchicago.org or at 312-744-9745.

4.1.4 Consideration of Public Comments

All comments submitted to the City, both written and oral, will be reviewed and addressed within the finalized Action Plan. The City will incorporate a summary of comments and meaningful responses to each into the finalized Action Plan. The final Action Plan will include a numbered list of the comments received by the City alongside meaningful responses to each in **Appendix 6.3**.

4.1.5 Citizen Complaints

Complaints are statements that the City receives from concerned citizens related to the City's CDBG-DR funded programming, the Action Plan, any Substantial Amendment, or related to any unacceptable behavior from a CDBG-DR program representative.

Complaints may fall into two categories: Formal Complaints and Informal Complaints:

- Formal Complaints: Written statements of grievance about a specific, addressable issue which may be received by the City via email, handwritten notes, or comments submitted through the City's CDBG-DR [website](#) or at public hearings.
- Informal Complaints: Verbal or written complaints that are too general in nature to act upon.

The City will carefully consider all formal complaints received, and each complaint will be referred to the appropriate staff to be reviewed and responded to within 15 business days. Complaints can be submitted through the same methods listed in the Public Comment section. The City will maintain electronic records of complaints and inquiries. City staff will review these complaints and inquiries at least quarterly to identify complaint patterns and, if necessary, adjust recovery program policies accordingly.

4.1.5.1 Fraud, Waste, and Abuse Complaints

The City takes complaints regarding suspected fraud, waste, and/or abuse of CDBG-DR funds seriously. The City's policies and procedures to prevent fraud, waste, and/or abuse will be made available to HUD and on its disaster recovery website by the Financial Certification deadline.

Complaints made regarding suspected fraud will be reviewed and, if appropriate, the City will coordinate investigation with the applicable local, state, and federal agencies. Complaints regarding fraud, waste or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@HUDOIG.gov).

DRAFT

4.2 Modifications to the Action Plan

Understanding that disaster recovery needs may change over time as additional data comes available, the City will amend the proposed Action Plan as needed to best address Chicago's long-term recovery needs and goals. All amendments to the Action Plan will be considered either substantial or non-substantial, with corresponding policies outlined below.

4.2.1 Substantial Amendment

Any amendment to the City's action plan that meets the definition of a substantial amendment are subject to the same public notification and comment procedures as the overall Action Plan. All substantial amendments will be posted on the City's website for review and comment prior to adoption by the City. A public comment period of no less than 30 calendar days shall be allowed prior to implementation of any substantial amendment. The City will hold additional public hearings or consult the City Council on substantial amendments as needed.

An amendment is considered substantial if it meets any of the following criteria:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed reduction in the overall benefit requirement
- An allocation/reallocation of 15% of a program's total budget

4.2.2 Non-Substantial Amendment

A non-substantial amendment is one that does not meet the threshold of a substantial amendment, based on the criteria outlined above. Non-substantial amendments do not require a public comment period. These amendments to the Action Plan will be posted on Chicago's official disaster recovery website, and they will be numbered sequentially to ensure stakeholders can identify the most up-to-date version of the Action Plan.

4.3 Performance Reports

Our departments have designed each program based on their experience, best practices, and research to develop output and outcome measures. Each program will collect performance indicators identified by the program teams within departments. These metrics will be leveraged to demonstrate the progress and reach of the programs supported with CDBG-DR funds.

The City will submit detailed and timely reports through the Disaster Recovery Grant Reporting (DRGR) system. These reports will allow HUD to track the City's progress, ensure compliance, and monitor the use of CDBG-DR funds throughout the lifecycle of the grant. Quarterly Performance Reports (QPRs) will be submitted 30 calendar days after the end of each calendar quarter until all grant funds are expended and recovery objectives have been met. Each report will provide an update on recovery activities, expenditures, and performance metrics, including data on direct benefit activities such as the number of individuals assisted.

The City will maintain all project records in the DRGR system at a level of detail that permits HUD's remote review of compliance and risk assessment. For all activities, the address of each CDBG-DR assisted property will be recorded in the performance report. Once HUD approves each QPR, a public version of the report (with personally identifiable information removed) will be posted on the City's official disaster recovery website within five calendar days. Should a report be rejected, the City will make necessary revisions and resubmit it within 30 calendar days.

5 APPENDIX

5.1 Certifications

The City acknowledges that it will administer the CDBG-DR grant consistent with the following certifications required by Federal statute and regulation:

a. **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan:**

The City certifies that it:

- (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
- (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

b. **Authority of Grantee:** The City certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the City, and any entity or entities designated by the City, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

c. **Consistency with the Action Plan:** The City certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

d. **Citizen Participation:** The City certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements).

e. **Consultation with Local Governments:** *Not Applicable*

f. **Use of Funds:** The City certifies that it is complying with each of the following criteria:

1. *Purpose of the funding.* Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).
2. *Maximum Feasibility Priority.* With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as

to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

3. *Overall benefit.* The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
4. *Special Assessment.* The City will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title;
 - (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the City certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- g. **Grant Timeliness:** The City certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the City has reviewed the requirements applicable to the use of grant funds.
- h. **Order of Assistance:** The City certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.
- i. **For Local Governments**
 - a. **24 CFR 91.225(a)(1) Affirmatively Furthering Fair Housing:** Each jurisdiction is required to submit a certification that it will affirmatively further fair housing. This includes certification that the grantee will affirmatively further fair housing, consistent with §§ 5.150 and 5.151 of this title.
 - b. **24 CFR 91.225(a)(3) Anti-Lobbying:** The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

- c. **24 CFR 91.225(a)(7) Section 3:** The jurisdiction must submit a certification that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 75.
- d. **24 CFR 91.225(b)(5) Excessive Force:** A certification that the jurisdiction has adopted and is enforcing:
 - i. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
 - ii. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.
- e. **24 CFR 91.225(b)(6) Compliance with Anti-discrimination Laws:** The jurisdiction must submit a certification that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.
- f. **24 CFR 91.225(b)(7) Compliance with Lead-Based Paint Procedures:** The jurisdiction must submit a certification that its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.
- g. **24 CFR 91.225(b)(8) Compliance with Laws:** A certification that the jurisdiction will comply with applicable laws.

5.2 Waivers

The City does not request any waivers as part of the initial submission of this Action Plan for Disaster Recovery but may seek waivers via independent submission of such requests at any time.

DRAFT

5.3 Summary of and Response to Public Comments

As the public provides input, the City will update this section with a summary of feedback received and the City’s response.

Table 5: Summary of and Response to Public Comments

| Comment Received | City Response |
|------------------|---------------|
| 1. | |
| 2. | |
| 3. | |
| 4. | |
| 5. | |
| 6. | |
| 7. | |
| 8. | |
| 9. | |
| 10. | |

DRAFT

5.4 Standard Form 424

DRAFT

Application for Federal Assistance SF-424

*1. Type of Submission:

☐ Preapplication

☒ Application

☐ Changed/Corrected Application

*2. Type of Application

☒ New

☐ Continuation

☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify)

*3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

*5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: City of Chicago

*b. Employer/Taxpayer Identification Number (EIN/TIN):
36-6005820

*c. UEI:
NDHBBJ4B1LN5

d. Address:

*Street 1: 121 N. LaSalle Street

Street 2: Room 604

*City: Chicago

County/Parish: Cook

*State: IL

*Province:

*Country: USA: United States

*Zip / Postal Code 60602-1202

e. Organizational Unit:

Department Name:
Office of Budget and Management

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: *First Name: Matthew

Middle Name:

*Last Name: Schmitz

Suffix:

Title: Managing Deputy Budget Director

Organizational Affiliation:
Office of Budget and Management

*Telephone Number: 312-744-9437

Fax Number:

*Email: matthew.schmitz@cityofchicago.org

Application for Federal Assistance SF-424

*9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government



Type of Applicant 2: Select Applicant Type:

Pick an applicant type

Type of Applicant 3: Select Applicant Type:

Pick an applicant type

*Other (Specify)

*10. Name of Federal Agency:

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218; 14.228

CFDA Title:

Community Development Block

*12. Funding Opportunity Number:

14.218; 14.228

*Title:

Community Development Block Grant—Disaster Recovery

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

The City of Chicago will be implementing disaster recovery efforts in the HUD-identified Most Impacted and Distressed areas following presidentially declared disasters 4728, 4749 and 4819.

*15. Descriptive Title of Applicant's Project:

City of Chicago Community Development Block Grant—Disaster Recovery

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

*a. Applicant: IL-001; IL-002; IL-003; IL-004; IL-00

*b. Program/Project: IL-001; IL002; IL-003; IL-004; IL-004

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

*a. Start Date: 1/16/2025

*b. End Date: 1/16/2031

18. Estimated Funding (\$):

| | |
|--------------------|------------------|
| *a. Federal | \$ 426,608,000 |
| *b. Applicant | \$ 0 |
| *c. State | \$ 0 |
| *d. Local | \$ 97,013,087.00 |
| *e. Other | \$ 0 |
| *f. Program Income | \$ 0 |
| *g. TOTAL | \$ 523,621,087 |

***19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on _____.
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

***20. Is the Applicant Delinquent On Any Federal Debt?**☐ Yes ☒ No

If "Yes", explain:

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: _____ *First Name: Annette _____

Middle Name: _____

*Last Name: Guzman _____

Suffix: _____

*Title: Budget Director

*Telephone Number: 312-744-0053

Fax Number:

* Email: Annette.Guzman@cityofchicago.org

*Signature of Authorized Representative: Annette Guzman

Digitally signed by Annette Guzman
DN: cn=Annette Guzman, o=City of Chicago, ou=Office of Budget & Management, email=annette.guzman@cityofchicago.org, c=US
Date: 2025.04.09 13:38:52 -0500

*Date Signed: 4.9.25

Intergovernmental Review (SPOC List)

Executive Order 12372, "Intergovernmental Review of Federal Programs," was issued with the desire to foster the intergovernmental partnership and strengthen federalism by relying on State and local processes for the coordination and review of proposed Federal financial assistance and direct Federal development. The Order allows each State to designate an entity to perform this function. Below is the official list of those entities.

States that are not listed on this page have chosen not to participate in the intergovernmental review process, and therefore do not have a SPOC. If you are located within a State that does not have a SPOC, you may send application materials directly to a federal awarding agency.

**** SPOC List as of July 2024 ****

ARIZONA

Deidre Mai
Office of Strategic Planning and Budgeting
Office of the Arizona Governor
1700 W. Washington St., Suite 600
Phoenix, AZ 85007
Telephone: (602) 542-7567
Fax: None
ahightower@az.gov

ARKANSAS

Dorris R. Smith
Administrator DFA IGS/State Technology
Office of Intergovernmental Services
Department of Finance and Administration
1515 W. 7th St., Room 412
Little Rock, Arkansas 72203
Telephone: (501) 682-5242
Fax: (501) 682-5206
doris.smith@dfa.arkansas.gov

CALIFORNIA

Grants Coordination
State Clearinghouse
Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, California 95812-3044
Telephone: (916) 558-3164
Fax: (916) 323-3018
state.clearinghouse@opr.ca.gov

DELAWARE

Micheale Smith
Budget Development, Planning and
Administration
Office of Management and Budget
122 Martin Luther King Jr. Blvd, South
Dover, DE 19901
Telephone: 302-672-5126
micheale.smith@delaware.gov

DISTRICT OF COLUMBIA

Executive Office of the Mayor
1350 Pennsylvania Avenue, NW
Suite 513
Washington, D.C. 20004
(202) 478-9200
Email: spoc.request@dc.gov

FLORIDA

Chris Stahl
Florida State Clearinghouse
Florida Dept. of Environmental Protection 3800
Commonwealth Blvd.
Mail Station 47
Tallahassee, Florida 32399-2400
Telephone: (850) 717-9076
Chris.Stahl@FloridaDEP.gov
Submissions:
State.Clearinghouse@FloridaDEP.gov

INDIANA

Luke Kenworthy
Director of Federal Grants Policy and Management
Indiana State Budget Agency
200 West Washington Street, Room 212
Indianapolis, IN 46204
Telephone: 317-234-2079
Fax: N/A
LKenworthy@sba.IN.gov

IOWA

Crystal Young
Iowa Department of Management
State Capitol Building, Room G12
1007 E Grand Avenue
Des Moines, IA 50319
Telephone: 515-802-5937
crystal.young@dom.iowa.gov

KENTUCKY

Lee Nalley
The Governor's Office for Local Development
100 Airport Drive, 3rd Floor
Frankfort, Kentucky 40601
Telephone: (502) 892-3462
Fax: (502) 573-1519
Lee.Nalley@ky.gov

LOUISIANA

Terry Thomas
Louisiana SPOC for EPA Grant
Office of Management and Finance
LA Department of Environmental Quality
P.O. Box 4303
Baton Rouge, LA 70821-4303
Phone (225) 219-3840
Fax: (225) 219-3846
Terry.Thomas@la.gov

MARYLAND

Jason Dubow, Manager
Resource Conservation & Management
Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore, Maryland 21201-2305
Telephone: (410) 767-4490
Fax: (410) 767-4480
mdp.clearinghouse@maryland.gov

MISSOURI

Tamra Wilson
Office of Administration
Commissioner's Office
201 W High Street, Room 125
Jefferson City, Missouri 65102
Telephone: (573) 751-0337
Fax: (573) 751-1212
Tamra.Wilson@oa.mo.gov

NEVADA

Governor's Office of Federal Assistance
Single Point of Contact
505 Capovilla, Suite 104
Las Vegas, Nevada 89119
Telephone: 775-684-0156
grants@ofa.nv.gov

NEW HAMPSHIRE

Alexis LaBrie
Grants Program Coordinator
Division of Administration
New Hampshire Department of Energy
21 South Fruit Street, Suite 10, Concord, NH 03301
Telephone: 603-271-3670
Fax: None
nhs poc@energy.nh.gov

SOUTH CAROLINA

David Seigler
Grants and Financial Services
Executive Budget Office
1205 Pendleton Street
Edgar A. Brown Building, Suite 529
Columbia, SC 29201
Telephone: (803) 734-0485
Fax: None
david.seigler@admin.sc.gov

UTAH

Brad Newbold
Federal Assistance Management Officer
Utah State Clearinghouse
Governor's Office of Planning and Budget
350 N State Street #150
Salt Lake City, UT 84114
Telephone: (801) 538-1543
stategrants@utah.gov

WEST VIRGINIA

Mackenzie Moss
Community Advancement and Development
WV Department of Economic Development
State Capitol
Building 3, Suite 700
Charleston, WV 25305
304-558-2234
clearinghouse@wv.gov
<https://wvcad.org/sustainability/clearinghouse>

PUERTO RICO

Jose I. Marrero Rosado
Puerto Rico Planning Board
Federal Proposals Review Office
P.O. Box 9023228
San Juan, Puerto Rico 00902-3228
Telephone: 787-725-9420
Fax: 787-725-7066
Jmarrero@ogp.pr.gov

VIRGIN ISLANDS

Jenifer C. O'Neal
Director
Office of Management and Budget
No. 5041 Norre Gade
Emancipation Garden Station, 2nd Floor
St Thomas, Virgin Islands 00802
Telephone: (340) 774-0750
Jenifer.Oneal@omb.vi.gov

AMERICAN SAMOA

Mr. Jerome Ierome
Administrator, Office of Grants Oversight and
Accountability
Coordinator, ASG High Risk Task Force
Office of the Governor
American Samoa Government (ASG)
A.P. Lutali Executive Office Building
American Samoa, 96799
Telephone: (684) 633-4116
Fax: (684) 633-2269
jerome.ierome.asg.govoffice@gmail.com

Changes to this list can be made only after OMB is notified by a State's officially designated representative. E-mail messages can be sent to MBX.OMB.OFFM.Grants@OMB.eop.gov.

Please note: Inquiries about obtaining a Federal grant should not be sent to the OMB e-mail shown above. The best source for this information is the Assistance Listings at SAM.gov (<https://sam.gov/>) and the Grants.gov website (<https://www.grants.gov/>).



DEPARTMENT OF LAW
CITY OF CHICAGO

MEMORANDUM

TO: U.S. Department of Housing and Urban Development
Office of Disaster Recovery

FROM: James McDonald *JFM*
Managing Deputy Corporation Counsel, Transactions

RE: CDBG-DR Action Plan – Grantee Certifications

DATE: March 27, 2025

Please be advised that the City of Chicago, as grantee of funds under the Community Development Block Grant Disaster Recovery program, agrees to the required certifications outlined in Appendix A of the Universal Notice and the applicable certifications for local government grantees listed in 24 CFR 91.225 except for certification 24 CFR 91.225(b)(5), which should be modified to read as follows:

Excessive Force: The grantee certifies that it has adopted and is enforcing the following policies:

- (1) A policy prescribing appropriate levels of force by law enforcement agencies within its jurisdiction, in compliance with applicable state and local law and with due regard for individuals' First Amendment rights, in connection with individuals engaged in nonviolent civil rights demonstrations; and
- (2) A policy of enforcing adherence by law enforcement agencies within its jurisdiction in applying applicable state and local laws in connection with nonviolent civil rights demonstrations within its jurisdiction.

