

Du Page County, Illinois

Amendment Number 2 to Action Plan to Receive Third Allocation of CDBG Disaster Recovery Funds

Public Law 113-2

FINAL FOR SUBMITTAL TO HUD

April 28, 2015



Executive Summary and Citizen Participation

DuPage County, Illinois was required to publish an Action Plan for the purpose of receiving a Community Development Block Grant-Disaster Recovery Grant (CDBG-DR) in the amount of \$7,000,000 in accordance with the Disaster Relief Appropriations Act, 2013 (Public Law 113-2). The U.S. Department of Housing and Urban Development (HUD) guidance for the funding was published December 16, 2013 in the Federal Register as Docket No. FR-5696-N-07 (the “Notice”) with an effective date of December 23, 2013. On June 3, 2014, a supplemental allocation of \$18.9 million was published in the Federal Register as Docket No. FR-5696-N-09 (“Second Notice”) with an effective date of June 9, 2014. On January 8, 2015, an additional supplemental allocation of \$5,626,000 was published in the Federal Register as Docket No. FR-5696-N-13 (“Third Notice”) with an effective date of January 13, 2015. This brings the total allocation to DuPage County to \$31,526,000. These funds are being made available to assist disaster recovery efforts in response to a declared major disaster occurring in DuPage County in April, 2013. These funds can be used only for specific disaster recovery-related purposes.

This Amendment Number 2 provides updates to the initial Action Plan, as previously amended by Amendment Number 1, including: updated infrastructure needs; inclusion of eligible commercial property in the strategic buy-out program; updated information as to funds that have been obligated under grant agreements with HUD; and information on additional resources being sought by DuPage County under the Community Development Block Grant – National Disaster Resilience Competition.

Following is a table illustrating, at the most practical level, how all funds programmed by this Amendment Number 2 are budgeted.

Activity Summary Table for Additional Allocation of \$5,626,000	
Activity	Total Budget
Administration	\$226,000
Planning	\$900,000
Carol Stream - Klein Creek Watershed Flood Control Plan/Armstrong Park Facility	\$2,700,000
Municipal Activities – Community Buy-Outs	\$1,500,000
HMGP/PDM Property Buy-Out (Local match)	\$200,000
West Branch DuPage River	\$100,000
TOTAL	\$5,626,000

In accordance with the DuPage County Community Services Language Access Plan, it has been determined that this Executive Summary is a vital document and it will be translated into Spanish and posted with the English version of the Executive Summary.

DuPage County will use this Amendment Number 2 to guide the distribution of the grant funds toward meeting the recovery of housing, infrastructure and economic effects of the declared disaster. This Amendment Number 2 has been designed to be consistent with the primary objective of providing funds for local projects with activities that meet one of the following national objectives of the Housing and Community Development Act of 1974, as amended: benefit to low/moderate income persons; slums or blight; urgent needs. At least fifty percent (50%) of the CDBG-DR grant award must be used for activities that benefit low- and moderate income persons.

This Amendment Number 2 must be submitted to HUD by May 12, 2015, which is 90 days from the effective date of the Second Notice.

Citizen Participation:

Amendment Number 2 is hereby submitted for public comment by publication in the *Daily Herald* on March 2, 2015 and placement on the following website where the full text may be viewed: www.dupageco.org (link to CDBG-DR on the left) or directly accessed at <http://www.dupageco.org/cdbg-dr/> , including an Executive Summary in Spanish. A paper copy of the full text will be provided upon request. A link to Amendment Number 2 will also be e-mailed to all municipal members of the DuPage Community Development Commission with a request that it be posted in a public place within the city or village, all persons/entities that have indicated an interest in DuPage County community development activities, members of the DuPage County Continuum of Care, and agencies able to disseminate the information to persons with disabilities. The public comment period will end on April 2, 2015. A summary of comments and views received and a summary of comments or views not accepted, including the reasons for non-acceptance, will be inserted after the public comment period. Amendment Number 2 will then be approved by the DuPage County Development Committee and at a duly called public meeting of the DuPage County Board.

A public hearing will be held to gain input on Amendment Number 2 and the DuPage County Community Development Block Grant – National Disaster Resilience Competition application as follows:

Thursday, March 19, 2015
7:00 p.m.
421 North County Farm Road
Wheaton, IL
Room 1500-B

The location of the public hearing is accessible to people with disabilities. Anyone requiring special accommodation for language assistance, hearing impairment, physical or other disability, or to ask questions, comment on Amendment Number 2, make a complaint, or request a paper copy of Amendment Number 2 or any other document related to these disaster recovery funds, should do so in accordance with the following contact information. Any individual, group, or agency wishing to comment on this proposed Substantial Amendment Number 2 may submit such comments in writing to be received by 4:30 p.m. on Thursday, April 2, 2015.

Contact Information:

Call: 630-407-6706
TDD (Hearing Impaired): 630-407-6502
Fax: 630-407-6702

E-mail: mary.mitros@dupageco.org

Mail a comment or request or visit office in person:

Mary Mitros
Stormwater Management
DuPage County Government
421 N. County Farm Road
Wheaton, IL 60187

1) Updated Impact and Unmet Needs Assessment

A needs assessment to understand the type and location of community needs was conducted in connection with the initial Action Plan and updated in connection with previous Amendment 1. Three core aspects of recovery were evaluated: housing, infrastructure and economic development. DuPage County consulted with affected citizens, stakeholders, local governments and public housing authorities to determine updates to the needs assessment. This consultation was accomplished through personal interviews, telephone conversations, discussion at public meetings, written correspondence, and surveys.

Housing Needs:

Rental The rental housing needs reported in Amendment 1 remain unchanged. DuPage County was required to describe how it would address the rehabilitation, mitigation and new construction needs of other assisted multifamily housing developments impacted by the disaster, including HUD-assisted multifamily housing, low income housing tax credit-financed developments and other subsidized and tax credit-assisted affordable housing. No needs have been identified for assisted multi-family rental housing. DuPage County does not have any units of Public Housing.

DuPage County has not identified any unmet need for multi-family market rate rental properties.

Owner-Occupied The owner-occupied needs reported in Amendment 1 remain unchanged. The unmet housing need of owner-occupied residential property was calculated using HUD’s methodology of using the number of housing units with unmet needs times the estimate cost to repair those units, less repair funds already provided by FEMA. To meet the statutory requirement of “most impacted,” homes are determined to have a high level of damage if they have damage of “major-low” or higher which is a real property FEMA inspected damage of \$8,000 or flooding over four (4) feet. Using this methodology, the unmet housing need was calculated to be (may be duplicated households):

DuPage County Residential Ownership Unmet Needs – Damage at least \$8,000				
Damage Level	# of Units	FEMA Verified Loss	Loss-Pay Out	Difference between Loss and Payout – Unmet Need
Major-Low	308	\$3,260,201	\$2,578,938	\$681,263
Major-High	152	\$3,110,549	\$1,837,064	\$1,273,485
Severe	27	\$1,040,798	\$273,951	\$766,847
TOTAL	487	\$7,411,548	\$4,689,953	\$2,721,595

DuPage County Residential Ownership Unmet Needs – Flooding Over Four Feet					
Category	Damage Level	# of Units	FEMA Verified Loss	Loss-Pay Out	Difference between Loss and Payout – Unmet Need
4-6 Feet 1 st Floor	Minor-Low	1	\$2,394	\$2,367	\$27
	Minor-High	3	\$21,103	\$12,588	\$8,515
	Major-Low	9	\$111,515	\$72,538	\$38,977
	Major-High	13	\$249,829	\$174,865	\$74,964
	Severe	1	40,847	0	\$40,847
4-6 Basement	Minor-Low	17	\$31,786	\$25,845	\$5,941
	Minor-High	59	\$315,081	\$223,646	\$91,435
	Major-Low	22	\$221,857	\$149,073	\$72,784
	Major-High	4	\$73,805	\$73,805	0
	Severe	0			
Over 6' – 1 st Floor	Minor-Low	0			
	Minor-High	2	\$10,567	0	\$10,567
	Major-Low	0			
	Major-High	1	\$15,718	\$15,718	0
	Severe	0			
TOTALS		132	\$1,094,502	\$1,750,445	\$344,057

Based on previous experiences administering flood money, the initial Action Plan allocated \$300,000 for rehabilitation and mold remediation for low/mod income households. When the activity actually commences, if it is determined that \$300,000 is not a sufficient amount of funding for this activity, the unmet need will be addressed in a subsequent amendment. This unmet need for owner-occupied housing is only part of the story when it comes to housing needs in DuPage County. The initial Action Plan stated over 300 properties that meet the criteria for property buy-out that were affected by the April, 2013 flood event (subject to flooding depth of one foot above the low entry elevation for any one historic event, subject to a flooding depth of one-half foot for any two historic food events, or a FEMA repetitive loss structure). As stated in the initial Action Plan and Amendment 1, there are many areas within DuPage County where property buy-out and demolition is the only solution to repetitive flooding of housing. Completion of infrastructure projects can also protect residential properties from future flooding. The projects proposed in the initial Action Plan and Amendment 1 included buy-out of approximately 54-60 properties and infrastructure projects that would benefit at least 257 homes by lessening the impact of future flood events.

The projects in this Amendment 2 would result in the following additional housing impact:

- Buy-out of an additional 8-10 houses
- Purchase of one commercial property, located within the regulatory floodplain

- Development of plans for the entire East Branch DuPage River Watershed and for the Community Development Block Grant – National Disaster Resilience Competition. The development and implementation of these plans have the potential to prevent 5,423 residential units from experiencing repetitive flooding.

Updated infrastructure needs: The initial Action Plan and Amendment 1 identified unmet infrastructure needs and proposed projects to address these needs. Two ongoing projects will require additional funding for completion (Armstrong Park Facility and West Branch River Restoration).

During the public comment period for Amendment 1, the majority of comments fell into three categories: need for property buy-out (an activity already proposed), municipal projects (municipalities were encouraged to apply for the Municipal Match activities already incorporated into the DuPage CDBG-DR program plan) and infrastructure projects, with much need expressed concerning the East Branch DuPage River Watershed. Because of the tremendous need in the East Branch area, DuPage County is taking steps to apply for Community Development Block Grant – National Disaster Resilience Competition (CDBG-NDRC) funds. DuPage County is an eligible applicant for CDBG-NDRC and has prepared the *East Branch DuPage River Watershed & Resiliency Plan* which was put out for public comment between February 9, 2015 and February 24, 2015. Extensive stakeholder outreach efforts included:

DuPage Steering Committee

- December 18, 2014 (full committee)
- December 22, 2014 (County staff)
- January 8, 2015 (full committee)
- January 26, 2015 (full committee)
- February 19, 2015 (full committee)

East Branch DuPage River Resiliency Plan Public Meetings

- January 14, 2015 (Lisle)
- February 5, 2015 (Wheaton)
- February 23, 2015 (Lombard)

CDBG-NDRC Public Hearing

- March 19, 2015

Other General Stakeholder Meetings

- November 21, 2014 (Initial Advisory Group Meeting for Region)
- January 7, 2015 (Non-Profit Organizations)
- January 8, 2015 (Non-Profit Organizations)

- January 14, 2015 (Non-Profit Organizations)
- January 14, 2015 (Park Districts, Chambers, Townships, Schools)
- January 23, 2015 (Green Government Council)
- January 27, 2015 (Finance Committee – All County Board Members)
- February 3, 2015 (DuPage Stormwater Management Committee – County Board and Municipal Members)
- February 5, 2015 (East Branch Environmental Focus Group)

Other Outreach

- Flooding and Quality of Life Survey. Currently over 700 respondents. Results are currently being analyzed.
- February 11, 2015 E-Mail Outreach to Continuum of Care

DuPage County Stormwater Department staff also had ongoing meetings with Cook County, the City of Chicago and the State of Illinois to coordinate a regional narrative for the CDBG-NDRC competition. DuPage County is also active on the regional steering committee, which includes the eligible applicants, Metropolitan Water Reclamation District, Natural Resources Defense Council, Chicago Metropolitan Agency for Planning, Center for Neighborhood Technology, and the Metropolitan Planning Council. Federal or national agencies that were stakeholders or providers of data in the process were: Federal Emergency Management Agency (FEMA), Federal Highway Administration (FHWA), National Technical Committee for Hydric Soils (NTCHS), National Wetlands Inventory (NWI), United States Army Corps of Engineers (USACE), United States Department of Agriculture (USDA), United States Environmental Protection Agency (USEPA), United States Fish and Wildlife Service (USFWS) and the United States Geological Survey (USGS). The Phase 1 application will be submitted to HUD by March 27, 2015. HUD will invite eligible entities to a Phase 2 application in June.

Therefore, the updated needs assessment for infrastructure includes the need for additional buy-outs and the need to resolve the East Branch of the DuPage River issues. Proposed uses of the funds under this Amendment 2, therefore, are to complete the Armstrong Park project, fund additional buy-outs, and fund the planning necessary to be able to implement the East Branch project we hope to have funded under the CDBG-NDRC.

CDBG-DR considers any infrastructure project to be a “major infrastructure project” if the project (or two more related infrastructure projects) has a total cost of \$50 million or more (including at least \$10 million of CDBG-DR funds or physically located in more than one county. No infrastructure project proposed by DuPage County for CDBG-DR funding meets the definition of “major infrastructure project;” therefore, the requirements for “covered projects” do not apply.

DuPage County is also required to group together and evaluate as a single infrastructure project all individual activities which are related to one another, either on a geographical or functional basis, or are logical parts of a composite of contemplated infrastructure-related actions. Infrastructure projects are also considered to be “related” if they automatically trigger other projects or actions, cannot or will not proceed unless other projects or actions are taken previously or simultaneously, or are interdependent parts of a larger action and depend on the larger action for their justification. Infrastructure projects based on watershed plans in which individual activities related on a geographical basis have been grouped and evaluated as a single infrastructure project. Details as to this grouping were contained in the previous Amendment 1.

Under this third allocation of funds, municipalities will have opportunity to apply for the Municipal Activities program through a competitive application process. The purpose of these funds will be to assist municipalities with buy-out of properties that will then be held in perpetuity by the municipality, rather than DuPage County. Maximum grants will be \$500,000 per municipality and will require that the municipality pay 25% of the buy-out cost.

Criteria	Maximum Points
Minimum Requirements	No points, but required for project acceptance: Governing Body Authorization; Public Hearing; Capacity; Fair Housing Action Plan; Map; Audit; Budget; Documentation of Need for Long Term Recovery from Storm Related Damage
Income Level of Beneficiaries	15 points (although these projects will be done under an “urgent need” national objective, projects that meet the needs of the lowest income neighborhoods and beneficiaries will receive additional points)
Project Impact	15 points
Leveraging of Funds	10 points (Municipalities shall supply evidence of funding availability for the required match)
Project Readiness	10 points (Communities should be able to demonstrate that there is an existing “buy-out” program within the municipality)

Economic Development/Impact on Economy: Only temporary business closures were reported in the initial Action Plan, with no ongoing impact or unmet need reported. SBA data obtained subsequent to the initial Action Plan states that 40 businesses in DuPage County reported real property and content damage from the April, 2013 flood. Only properties with total real estate and content loss in excess of \$30,000 are considered severe damage for purposes of identifying the most impacted areas. Of the 40 businesses reporting damage, only twelve met this threshold criteria. Out of all businesses reporting damage, fourteen applied for SBA assistance: five applications were declined in pre-processing and nine were approved. Therefore, it would appear that there are approximately five businesses that may have unmet need with no data available to show if they meet the threshold criteria for severe damage. There is no identifiable unmet economic development need.

2) Comprehensive Risk Analysis

The Comprehensive Risk Analysis remains unchanged from the initial Action Plan and previous Amendment 1. The *President's Climate Action Plan* was issued in June, 2013. It discusses three major initiatives, two of which are directly applicable to DuPage County disaster recovery, namely:

1. "Building Stronger and Safer Communities and Infrastructure," which includes "water management to conservation and disaster relief" as well as ensuring "that climate risk-management considerations are fully integrated into federal infrastructure and natural resource management planning."
2. "Protecting our Economy and Natural Resources," which includes "preparing for future floods" by an "approach that accounts for sea-level rise and other factors affecting flood risks."

DuPage County Stormwater Management is a Cooperating Technical Partner with FEMA with respect to floodplain modeling and mapping. DuPage County has a unique land mass that is an urban area with several streams, yet consists of flat slopes and broad floodplains. Thus, DuPage County utilizes a complex modeling program to forecast flood depths, frequencies and flood heights called Full Equations (FEQ) modeling.

The FEQ model is a computer program for solution of the full, dynamic equations of motion for one-dimensional unsteady flow in open channels and through control structures. A stream system that is simulated by application of FEQ is subdivided into stream reaches (branches). Using artificial rainfall on a sloping glass flume, resistance coefficients were computed for steady, spatially varied flow for both the energy and momentum conservation principles and it was found that the resistance coefficient from the momentum principle was always closer to the coefficient estimated from steady flow without lateral inflow. Because use of Manning's equation for resistance losses yields a

better estimate of the resistance coefficient for the momentum principle than for the energy principle, methods based on momentum conservation yield better estimates of the water-surface profile than do methods based on energy conservation, especially if Manning's is calibrated to measured water-surface profiles or historic high water marks. In addition, the resistance coefficient estimated from the momentum principle is insensitive to variations in the velocity of lateral inflow.

Runoff response to rainfall in urban areas is rapid and streams throughout Illinois have relatively flat slopes and broad flood plains. Thus, engineers, both with the State of Illinois government and with rapidly urbanizing counties surrounding Chicago, became interested in applying unsteady-flow analysis for flood plain delineation, flood forecasting, flood control reservoir operations, and other applications. Because a wide variety of hydraulic structures in the stream network can be simulated in the FEQ model, this model was selected by the U.S. Geological Survey (USGS) and cooperating agencies. The Illinois Department of Natural Resources, Office of Water Resources, and the County of DuPage, Department of Environmental Concerns, cooperated with the USGS to document the model schematization, governing equations, mathematical solution procedures, numerical characteristics, and input description for FEQ.

As a result, FEQ uses actual flood events to predict future elevations; this methodology is a dynamic modeling program that is reactive to climate change and weather volatility.

DuPage County experienced major floods in 1972, 1974, 1976, 1987, 1996, 2008, 2010, and 2013. Since the 1987 flood, DuPage County has taken significant steps to mitigate against future flood damage. In 2007, to address the potential impact and mitigation opportunities of flooding and other natural hazards, DuPage County (along with participating municipalities, agencies, and institutions) developed a Natural Hazard Mitigation Plan, which was updated in 2012 ("Mitigation Plan"). The Mitigation Plan meets the requirements of Section 104 of the Disaster Mitigation Act of 2000 (42 USC 5165) and the Hazard Mitigation Grant Program requirements contained in 44 CFR 201. The Mitigation Plan includes both a hazard assessment (what causes the hazard and the likelihood of occurrence) and a vulnerability assessment (the impact of the hazard on life, health, and property). Because it is important to consider a broad range of information, including forward looking analyses of risks to infrastructure from climate change, the Mitigation Plan was updated in 2012.

Information and data for the hazard analysis was collected from: municipalities; regional, state, and federal agencies; DuPage County records; DuPage County GIS; and the National Climate Data Center (NCDC) at the National Oceanic and Atmospheric Administration. For the vulnerability analysis, the County's GIS was used to examine DuPage County's exposure to floods because DuPage County data was superior to the default data in the FEMA HAZUS software. The Flood Hazard Assessment appears on pages 2-10 through 2-25 of the Mitigation Plan; the Flood Vulnerability Analysis appears on pages 2-26 through 2-33 of the Mitigation Plan. A conclusion of the Mitigation Plan (page 2-65) is that "floods have the highest impact on property and have the highest potential for economic impact." DuPage County's estimated flood vulnerability for

buildings in the 100 year floodplain is in excess of \$2.4 billion. 90% of these buildings are residential; therefore the risk analysis prioritizes mitigation of flood risk to residential property. All projects and activities proposed under CDBG-DR mitigate flood risk to residential property – whether construction/rehabilitation of infrastructure to alleviate flooding or buy-out of repetitive loss properties affected by the April, 2013 flood.

DuPage County promotes sound, sustainable long-term recovery planning that is informed by post-disaster evaluations of hazard risk and pro-actively makes land-use decisions that reflect responsible flood plain management (taking into account possible sea level rise). DuPage County has grown dramatically over the last six decades. From 1950 to 2002, DuPage County saw a 600% increase in population. This rapid urbanization from what was mostly agricultural land to large residential, commercial, and industrial areas has had a profound impact on many of DuPage County's rivers and streams. The Stormwater Management Program was established to address existing issues and to prevent future flood damages along the county's waterways. Since its inception, the County's Stormwater Management Division has worked to provide accurate floodplain information to property owners, regulators, and developers.

The Stormwater Management Plan ("Stormwater Plan) was adopted by the DuPage County Board in 1989. The Stormwater Plan established the goals, objectives and policies for developing a successful stormwater management program. In accordance with the Stormwater Plan, the DuPage County Stormwater and Floodplain Ordinance was adopted in October of 1991, effective February of 1992. Municipalities within DuPage County must adopt this plan in accordance with state and federal mandates.

As outlined in the Plan, the six goals guiding the Stormwater Management Program are:

1. Reduce the existing potential for stormwater damage to public health, safety, life and property.
2. Control future increases in stormwater damage within DuPage County and in areas of adjacent counties affected by DuPage County drainage.
3. Protect and enhance the quality, quantity and availability of surface and groundwater resources.
4. Preserve and enhance existing aquatic and riparian environments and encourage restoration of degraded areas.
5. Control sediment and erosion in and from drainage ways, developments, and construction sites.
6. Promote equitable, acceptable and legal measures for stormwater management.

DuPage County coordinates with other local and regional planning efforts to ensure consistency. Both County Board members and municipal representatives sit on the

Stormwater Management Planning Committee. DuPage County is the only county in the State of Illinois to be named a Cooperative Technical Partner (CTP) with FEMA for floodplain mapping, and, as such, DuPage County Stormwater Management has been working with Illinois State Water Survey, IEMA and FEMA to revise the FEMA Floodplain maps countywide to ensure that they are an accurate representation of the actual floodplains in the county. In addition to being a CTP, DuPage County Stormwater Management has been delegated permit review authority from both the Illinois Department of Natural Resources/Office of Water Resources and the United States Army Corps of Engineering.

Green Infrastructure: DuPage County both encourages development of green infrastructure by other stakeholders and incorporates all feasible green measures in each project it undertakes. For example, the Water Quality Improvement Grant Program financially supports green infrastructure projects throughout the County. Past recipients include schools, municipalities, homeowner associations, museums and park districts. Specific examples of green infrastructure being proposed for these funds are: (1) Klein Creek Watershed Flood Control Plan/Armstrong Park Facility: a constructed wetland to improve water quality before the retained flood waters enter back into Klein Creek and a secondary outfall area that will filter out particulates and allow for absorption of the retained flood waters. (2) The Villa Park Downtown Green Infrastructure project proposed in Amendment 1 is a groundwater infiltration improvement that is also resilient. These are two examples. Green infrastructure is defined by the Federal Register Notice as “the integration of natural systems and processes, or engineered systems that mimic natural systems and processes, into investments in resilient infrastructure. Green infrastructure takes advantage of the services and natural defenses provided by land and water systems such as wetlands, natural areas, vegetation, sand dunes, floodplains and forests, while contributing to the health and quality of life of those in recovering communities.” All projects undertaken with these funds will incorporate the principles of green infrastructure in accordance with Chapter 4 of the Mitigation Plan which contains a full discussion of such integration of natural systems and includes:

- Open Space Preservation (keeping the floodplain and other hazardous areas open and free from development)
- Stormwater Management (regulating development in the floodplain to ensure that it will be protected from flooding and that it won't divert floodwaters onto other properties and regulating all development to ensure that post-development peak runoff will not be greater than under pre-development conditions).
- Wetland Protection
- Stream Restoration
- Urban Forestry

Chapter 6 of the Mitigation Plan specifically discusses “structural projects” which include infrastructure such as reservoirs, levees, channel improvements, and drainage and storm sewer improvements. Section 6.7 specifically identifies planned structural projects.

Resiliency of Infrastructure: The maintenance of DuPage County flood control facilities is the responsibility of Stormwater Management. In addition to the maintenance of the facilities, Stormwater Management has built a resilient system that is not only redundant, but also allows for recovery if a portion of the system fails. Components of this resilient system include the five major stormwater detention facilities operated by DuPage County: Elmhurst Quarry; Wood Dale-Itasca Reservoir; Fawell Dam; River Dumoulin Pump Stations; and Spring Creek Reservoir. The Armstrong Park Reservoir will be the sixth major stormwater detention facility, once completed and on-line. The physical features of these facilities that require operation and maintenance services include gates, pumps and intake weirs. Staff performs routine checks and minor maintenance at these stormwater facilities weekly.

Six off-line, gravity reservoirs are also the operation and maintenance responsibility of DuPage County. These reservoir facilities are: Gary-Kehoe; Meacham Grove; Wayne Oaks; Lake Street; Kress Creek; and Eldridge Park. DuPage County also maintains some smaller detention basins, such as the ones at Crest Road and Dale Road.

DuPage County is required to identify and implement resilience performance standards that can be applied to each infrastructure project recommended in this Amendment 2. DuPage County also certifies that such standards will also be applied to infrastructure projects recommended in the Initial Action Plan.

DuPage County Stormwater Management sets specific performance standards to ensure that DuPage County flood control facilities are resilient. We go beyond a reactive approach when designing our systems and take a proactive stance to ensure our facilities can withstand crisis and deflect attacks of any nature. The County has moved past traditional risk and governance models and focused instead on resilience.

During the design phase of our projects, DuPage County Stormwater Management adds specific features and associated specifications to protect against unplanned failures. These include back up power systems, manual control installation, failure and breach analysis and emergency action plans on file with the local and state entities

3) Basis for Allocations (Connection Between Needs and Allocation of Funds)

The updated needs assessment has informed the allocation determinations in that two needs were identified: housing and infrastructure. Projects proposed are divided between these needs, as follows:

Housing (buy-outs which will also result in infrastructure improvement	\$1,700,000
Infrastructure	\$2,800,000

4) Program/Activity Details

Detailed information about each activity is stated in the following Activity Detail Table:

Activity Detail Table		
Activity	Description	3rd Allocation Budget
<p>Administration</p> <p>Eligibility: DuPage County is allowed to use up to 5% of the grant for this purpose.</p> <p>National Objective: N/A</p> <p>Projected start date: 11/1/2014 Projected end date: 9/29/2019</p>	<p>Administration of the grant fund over the five year period of the grant.</p> <p>Location/geographic description: N/A</p> <p>Responsible Organization: DuPage County (Community Services Department)</p> <p>Performance measures: timely and compliant administration of the grant; timely expenditures; timely reporting.</p>	\$226,000
<p>Planning</p> <p>Eligibility: DuPage County is allowed to use up to 15% of the total grant for this purpose, but is requesting 5%.</p> <p>National Objective: N/A</p> <p>Projected start date: 11/1/2014 Projected end date: 9/29/2019</p>	<p>Overall eligible planning activities for this grant.</p> <p>Location/geographic description: N/A</p> <p>Responsible Organization: DuPage County (Community Services Department)</p> <p>Performance measures will be: timely preparation and filing of all planning documents for grant.</p>	\$900,000
<p>Strategic Buy-Out Program</p>	<p>No additional funds are being committed to this activity under this Amendment 2. Please note, however, that this activity (as detailed in the original Action Plan and Amendment 1) is being amended to include the potential purchase of one commercial property.</p>	

Activity Detail Table		
Activity	Description	3rd Allocation Budget
<p>Klein Creek Watershed Flood Control Plan/Armstrong Park Facility</p> <p>Eligibility: Infrastructure</p> <p>National Objective: Low/Mod</p> <p>Projected start date: 5/1/2014 Projected end date: 9/29/2019</p>	<p>Construction of two reservoir system to be a permanent solution to the flooding which occurred not only in the recent event, but has repeatedly occurred (August, 2007; September, 2008; July 2010; and April, 2013). The majority of the residents that currently reside in the floodplain in this neighborhood have been listed impacted and/or displaced by all four of these storm events.</p> <p>Specific impact and long term recovery: Alleviation of repetitive flooding from this low/mod residential area. This will result in long-term recovery for these households.</p> <p>Location/geographic description: Armstrong Park, Carol Stream</p> <p>Responsible organization: DuPage County (Stormwater)</p> <p>Performance measures will be: project completion and # of beneficiaries</p>	<p>\$2,700,000</p>
<p>Municipal Activities – Community Buy-Out Program</p> <p>Eligibility: Housing/Infrastructure</p> <p>National Objective: Urgent Need</p> <p>Projected start date: 11/1/2014 Projected end date: 9/29/2019</p>	<p>Opportunity for municipalities to apply for 75% of cost for housing buy-outs.</p> <p>Specific impact and long term recovery: Buy-out is the only alternative in many flood prone areas of the County where there is no permanent infrastructure solution to the flooding. Impact to health and safety of residents, alleviation of sewer back-up and residential flooding. This will result in long-term recovery for some households and creation of safer environment for other neighborhoods.</p> <p>Location/geographic description: DuPage County.</p> <p>Responsible Organization: DuPage County will run application process and select projects based on scoring criteria. DuPage County (Stormwater) will oversee municipal implementation.</p> <p>Performance measures will be: # of units (8-10 anticipated)</p>	<p>\$1,500,000 (threshold per house determined on a case-by-case basis; \$500,000 threshold per municipality)</p>

Activity Detail Table		
Activity	Description	3rd Allocation Budget
<p>HMGF/PDM Buy-Out Match</p> <p>Eligibility: Housing</p> <p>National Objective: Urgent Need</p> <p>Projected start date: 11/1/2014</p> <p>Projected end date: 9/29/2019</p>	<p>This activity will provide the required 25% match share for FEMA/IEMA buyouts.</p> <p>Specific impact and long term recovery: Buy-out is the only alternative in many flood prone areas of the County where there is no permanent infrastructure solution to the flooding. This will result in long-term recovery for these households.</p> <p>Location/geographic description: DuPage County, beginning with Lisle, unincorporated DuPage County, Downers Grove, Addison and Westmont.</p> <p>Responsible Organization: DuPage County (Stormwater)</p> <p>Performance measures will be: # of units (2-3 units with these additional funds)</p>	<p>\$200,000</p>
<p>Warrenville – West Branch River Restoration & Flood Mitigation</p> <p>Eligibility: Infrastructure</p> <p>National Objective: Low/Mod</p> <p>Projected start date: 11/1/2014</p> <p>Projected end date: 9/29/2019</p>	<p>Restoration of natural floodplain for river conveyance; construction of flood protection berm and other flood control measures.</p> <p>Location/geographic description: area generally bounded by Main St. (north), Winfield Rd. (west), Torch Parkway (south) and River Road (west).</p> <p>Specific impact and long term recovery: massive flooding was a repetitive flood event for this area; long term recovery for residential areas to prevent repetitive flood events.</p> <p>Responsible organization: DuPage County (Stormwater)</p> <p>Performance measures will be: project completion and # of beneficiaries</p>	<p>\$100,000</p>

5) Budget and Timeline Information

Programming funds from this third allocation as stated above will result in an overall Disaster Recovery budget and national objective mix as follows:

DuPage County CDBG-DR
Budget

	Programming of Funds			National Objective	
	1st Allocation	2nd Allocation	3rd Allocation	Low/Mod	Urgent Need
Administration	350,000	945,000	226,000	N/A	N/A
Planning	140,000	378,000	900,000	N/A	N/A
Strategic Buy-Out	2,700,000	3,297,000		2,700,000	3,297,000
HMGP/PDM Buy-Out Match		1,250,000	200,000	300,000	1,150,000
Rehab/Mold Remediation	300,000			300,000	
Carol Stream - Klein Creek Watershed Flood Control Plan/Armstrong Park Facility	3,010,000	3,500,000	2,700,000	9,210,000	
Municipal Activities	500,000	1,500,000	1,500,000	500,000	3,000,000
Bloomington - Springbrook Culvert		450,000			450,000
Villa Park - Downtown Green Infrastructure		1,000,000			1,000,000
Warrenville - West Branch River Restoration & Flood Mitigation		4,400,000	100,000	4,500,000	
Westmont - Liberty Park Improvement		1,000,000			1,000,000
Glen Ellyn - Lake Ellyn Outlet		245,000			245,000
Glen Ellyn - Perry's Pond		275,000			275,000
Villa Park - Sugar Creek Watershed Improvement		550,000			550,000
Winfield - Winfield Creek Watershed Plan		110,000			110,000
TOTALS	\$7,000,000	\$18,900,000	\$5,626,000	\$17,510,000	\$11,077,000
				At least 50% of funds must meet Low/Mod National Objective	

While the foregoing is the overall project budget, funds are obligated by HUD as requested. Once funds are obligated, there is a two year deadline for expenditure and drawdown. DuPage County also reserves the right to move funds between activities after they are obligated, if one activity is expending faster than another. Such movement of funds will not be considered a Substantial Amendment, provided the programmed amount for any activity is not exceeded. It is important to timely expend the funds that are actually obligated before requesting additional obligation, which means funds should not be held for a slow moving activity. Funds for any slow moving activity that have been moved to another category for expenditure purposes will be replenished or reprogrammed in a subsequent amendment. The following illustrates how funds are currently obligated (Round 1 and Round 2), in process (Round 3) and the request under this Amendment 2 ("Round 4 - Allocation 3").

DuPage County CDBG-DR Budget

	Total Programmed to Activity	Round 1 - Allocation 1	Round 2 - Allocation 2	Round 3 - Feb, 2015	Round 4 - Allocation 3
Administration	1,521,000	35,000	50,000	50,000	
Planning	1,418,000				
Strategic Buy-Out	5,997,000			600,000	
HMGP Buy-Out Match	1,450,000			500,000	
Rehab/Mold Remediation	300,000			20,000	
Carol Stream - Klein Creek Watershed Flood Control Plan/ Armstrong Park Facility	9,210,000	1,465,000	2,930,000	2,115,000	2,700,000
Municipal Activities	3,500,000			200,000	
Bloomington - Springbrook Culvert	450,000			50,000	
Villa Park - Downtown Green Infrastructure	1,000,000				
Warrenville - West Branch River Restoration & Flood Mitigation	4,500,000			50,000	
Westmont - Liberty Park Improvement	1,000,000			50,000	
Glen Ellyn - Lake Ellyn Outlet	245,000				
Glen Ellyn - Perry's Pond	275,000				
Villa Park - Sugar Creek Watershed Improvement	550,000				
Winfield - Winfield Creek Watershed Plan	110,000				
TOTALS	31,526,000	1,500,000	2,980,000	3,635,000	2,700,000

DuPage County CDBG-DR Anticipated Project Timeline

Activity	2014	2015		2016		2017		2018		2019
	Q4	Q1- Q2	Q3- Q4	Q1- Q2	Q3- Q4	Q1- Q1	Q3- Q4	Q1- Q2	Q3- Q4	Q1- Q2
Buy-Out										
Rehab/Mold										
Armstrong										
Municipal Activities										
Bloomington										
Villa Park – Downtown										
Warrenville										
Westmont										

DuPage County CDBG-DR Anticipated HUD Funding Obligation Schedule

Obligation 1 – June 18, 2014	\$1,500,000
Obligation 2 - Amendment 1 – December 23, 2014	\$2,980,000
Obligation Request in process February, 2015	\$3,635,000
Obligation Request this Amendment 2	\$2,700,000
To be requested on or before January, 2016	\$4,000,000
To be requested on or before June, 2016	\$2,000,000
To be requested on or before October, 2016	\$6,000,000
To be requested on or before June, 2017	\$6,500,000
To be requested on or before September, 2017	\$2,211,000
TOTAL	\$31,526,000

6) Environmental

Due to the nature and design of this program, these actions are subject to an environmental review. DuPage County Community Development will assume responsibility for environmental reviews at the appropriate level.

7) Section 3

CDBG-DR requires compliance with Section 3 requirements and encourages Section 3 related initiatives. DuPage County will comply with Section 3 requirements.

8) Proficient Controls, Processes, Procedures

As part of the process to receive the initial allocation of CDBG-DR funds, DuPage County certified that it has in place proficient financial controls and procurement processes and has established adequate procedures to prevent any duplication of benefits, ensure timely expenditure of funds, maintain comprehensive Web sites and detect and prevent waste, fraud, and abuse. There have been no material changes in processes or procedures that could potentially impact this prior certification.

9) Waivers

DuPage County intends to utilize the waivers and alternative requirements applicable to this appropriation published by HUD in the Second Notice. DuPage County reserves the ability to request certain waivers from the Secretary of HUD, if necessary.

10) Substantial Amendments

At a minimum, the following modifications will constitute a substantial amendment: a change in program benefit or eligibility criteria; the allocation or re-allocation of more than \$1 million; or the addition or deletion of an activity. DuPage County may substantially amend the Action Plan by following this Citizen Participation Plan. Amendments to the Action Plan that do not meet the threshold to be considered a substantial amendment will not require a public comment period, but all amendments will be numbered sequentially and posted on the disaster recovery website. The Citizen Participation plan has been updated in accordance with the requirements to receive this additional allocation and is posted on the DuPage County CDBG-DR website.

11) Public Comments –

Public comment was received only at the public hearing. Three members of the public attended the public hearing and asked multiple questions. Following is the comment received and DuPage County's responses. All comments were accepted and already incorporated into the plans and strategies of the CDBG-DR funding.

1. Resident of Oak Brook: Stated he was thankful the Property Acquisition Project was still in the works and hopes to hear from the County very soon. Felt it would be a good idea for the County to purchase several other properties in the cul-de-sac as they are also flood prone. Inquired which properties the County may be interested in acquiring. (DuPage County response: Staff stated that they are not

permitted to disclose the properties under consideration. The property would probably be County maintained and returned to open space).

2. Resident of Oak Brook: Asked the difference between the HUD allocation and the Grant. (DuPage County response: Staff explained it was two different allocations. One is money already allocated, the other is grant money we are working on being awarded for strategic initiatives).
3. Resident of Oak Brook: Inquired what the timeline was for the property acquisition. (DuPage County response: Staff's goal is to have everything closed before winter of 2015).
4. Resident of Winfield: Stated that Winfield Creek is the north boundary of his property. The house has flooded four times. Does not feel there is a flood relief project in place for this area. (DuPage County response: Included in the third allocation second substantial amendment is a "Community Buy-out Program". From the previous phase, The Village of Winfield has planning money to build off of the County's Watershed Plan, and in this Phase there is a "Community Buy-out Program").
5. Resident of Winfield: Stated that he is anxious to participate in a buy-out. There are no means to prevent them from being flooded again. Another flood will make the structure uninhabitable. Need the buy-out funds in order to move. (DuPage County response: Staff stated that the constituent should be hearing from County staff soon. The County just received approval to move forward on the Property Acquisition Project. Staff's goal is to have everything closed before winter of 2015).
6. Resident of Winfield: Stated he is very happy with the news. Inquired if there is any project in the works to deal with Winfield Creek. (DuPage County response: Staff is reviewing existing culverts and potential storage areas. This is a unique situation where there are many storm sewers which feed into the creek.)
7. Resident of Winfield: Is it possible to meet the appraiser when a property is being considered for buy-out? (DuPage County response: Staff answered that the appraiser has to offer the homeowner the opportunity to accompany them into the home. Staff thoroughly explained the appraisal process).