



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

DEC 01 2014

Notice of 2014 National Disaster Resilience Competition (NDRC) Threshold Deficiency

HUD Sent via Email

State of Alaska
Ms. Ann Y. Gravier
State Hazard Mitigation Officer
Ann.gravier@alaska.gov

Dear Ms. Gravier:

Thank you for your submission to the National Disaster Resilience Competition (NDRC). The purpose of this optional submission just 45 days after publication of the Notice of Fund Availability (NOFA) is to help you make the best possible Phase 1 submission in March 2015. Any deficiency noted in this letter also includes a note about the missing element required by the NOFA. Demonstrating three linked thresholds (most impacted AND distressed areas AND with unmet recovery needs) presents challenges HUD has not previously asked of Community Development Block Grant-Disaster Recovery (CDBG-DR) grantees. For most applicants, this has proven to be a tough task. If this letter notes deficiencies below, please know that you are not alone and that technical assistance is available to help you perfect your proposal.

For Target Area #1 (City of Alakanuk):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 1, Most Impacted Infrastructure: Describes infrastructure damage greater than \$2M, however the only reference to data provided is a summary of FEMA project worksheets. Does not include engineering report with an estimated repair amount and sources and uses statement for the project showing the funding shortfall or other evidence of an estimate of expenditures to make repairs that support this claim.

Deficiency – 1, Most Impacted Environmental Degradation: Describes generally how environmental degradation (erosion) places housing, infrastructure and/or economic revitalization at risk, however, does not describe how it threatens long-term recovery of critical natural resources. USACE study provided pre-dates the disaster, and therefore does not describe how the Qualified Disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage to the environment. USACE report provided describes risks from erosion, however it is dated 2009, before the qualifying disaster, and as such, does not describe

damage from the disaster, however it does support the claim of future risk.

Deficiency – 1, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 1, Unmet Recovery Need Environmental Degradation: Does not describe remaining environmental damage from the disaster and does not discuss how damage cannot be addressed with existing resources. Does not include a detailed report from a reputable public or private organization completed since June 2013 describing remaining damage with a certification date after March 2014 indicating that there is remaining damage of \$400,000 or more.

For Target Area #2 (Kotlik):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 2, Most Impacted Infrastructure: Describes infrastructure damage greater than \$2M, however the only reference to data provided is a summary of FEMA project worksheets. Does not include engineering report with an estimated repair amount and sources and uses statement for the project showing the funding shortfall or other evidence of an estimate of expenditures to make repairs that support this claim.

Deficiency – 2, Most Impacted Environmental Degradation: Describes generally how environmental degradation (erosion) places housing, infrastructure and/or economic revitalization at risk, however, does not describe how it threatens long-term recovery of critical natural resources. USACE study provided pre-dates the disaster, and therefore does not describe how the disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage to the environment from the Qualified Disaster. USACE report provided describes risks from erosion, however it is dated 2009, before the qualifying disaster, and as such, does not describe damage from the disaster, however it does support the claim of future risk.

Deficiency – 2, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G

Deficiency – 2, Unmet Recovery Need Environmental Degradation: Does not describe remaining environmental damage from the disaster or why it cannot be addressed with existing resources. Does not include a detailed report from a reputable public or private organization completed since June 2013 describing remaining damage with a certification date after March 2014 indicating that there is remaining damage of \$400,000 or more.

For Target Area #3 (Galena):

The identified geography meets the most impacted threshold on the basis of housing.

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 3, Most impacted Infrastructure: Describes infrastructure damage greater than \$2M, however only data provided is a summary table of FEMA project worksheets. Does not include engineering report with an estimated repair amount and sources and uses statement for the project showing the funding shortfall or other evidence of an estimate of expenditures to make repairs that support this claim.

Deficiency – 3, Most Impacted Environmental Degradation: Describes generally that the area is facing environmental degradation (erosion) but does not describe how this erosion is significant or how it places housing, infrastructure and/or economic revitalization at risk. The submission does not describe how the degradation threatens long-term recovery of critical natural resources. Does not provide references to the studies mentioned or explain how these studies support the claim of future risk.

Deficiency – 3, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 3, Unmet Recovery Need Environmental Degradation: Does not describe remaining environmental damage from this Qualified Disaster that has not yet been addressed and that cannot be addressed with remaining resources. Does not include a detailed report from a reputable public or private organization completed since June 2013 describing remaining damage with a certification date after March 2014 indicating that there is remaining damage of \$400,000 or more.

For Target Area #4 (Newtok):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 4, Most impacted Infrastructure: Describes infrastructure damage less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of this claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 4, Most Impacted Environmental Degradation: Describes erosion damage generally, but does not discussed how the Qualified Disaster resulted in significant degradation to

the environment putting the infrastructure in the area in great harm for a future disaster, however references to the National Resource Conservation Service study mentioned to support this description and the claim of future risk is not provided. US Army Corps of Engineers study, which appears to be from 2004, predicts erosion through 2027 resulting in complete loss of the community within 10-15 years, including housing and infrastructure. However, because this study pre-dates the qualifying disaster, it does not reference how erosion caused by this Qualified Disaster threatens long-term recovery of critical natural resources. It also does not address risk from future disasters.

Deficiency – 4, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 4, Unmet Recovery Need Environmental Degradation: Does not describe remaining environmental damage from this Qualified Disaster or discuss whether damage can be addressed with existing resources. Does not include a detailed report from a reputable public or private organization completed since June 2013 describing remaining damage to the environment with a certification date after March 2014 indicating that there is remaining damage of \$400,000 or more.

For Target Area #5 (Shishmaref):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 5, Most Impacted Environmental Degradation: Describes generally how environmental degradation (coastal erosion) places housing, infrastructure and/or economic revitalization at risk, however, does not describe how damage from this Qualified Disaster threatens long-term recovery of critical natural resources. USACE study provided pre-dates the disaster, and therefore does not describe how this Qualified Disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage to the environment from this Qualified Disaster. USACE report provided describes risks from erosion, however it is dated 2009, before the qualifying disaster, and as such, does not describe damage from the disaster, however it does support the claim of future risk.

Deficiency – 5, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 5, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster or discuss how other resources are not available to address the damage. Does not describe remaining damage to the environment with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #6 (Unalakleet):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 6, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 6, Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Does not describe how this Qualified Disaster resulted in significant degradation the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage.

Deficiency – 6, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 6, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster or describe how the damage from that disaster cannot be addressed with existing resources. Does not describe remaining damage with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #7 (Emmonak):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 7, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 7, Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Does not

describe how this Qualified Disaster resulted in significant degradation the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage.

Deficiency – 7, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 7, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster or explain how the damage cannot be addressed with existing resources. Does not describe remaining damage to the environment from this Qualified Disaster with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #8 (Golovin):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households; and
- Disaster impacted a federal target area or economically fragile area (tribal area).

Deficiency – 8, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 8, Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Does not describe how the disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage to the environment caused by this Qualified Disaster. USACE report provided describes risks from erosion, however it is dated 2007, before the qualifying disaster, and as such, does not describe damage from the disaster.

Deficiency – 8, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 8, Environmental Distress: Response does not include description of contaminated property cleaned, undergoing cleanup, or proposed for cleanup in the affected area.

Deficiency – 8, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from this qualifying disaster. Does not describe remaining damage with a cost estimate for making repairs that is \$400,000 or greater and does not discuss whether these needs cannot be addressed with existing resources. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after

March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #9 (Kipnuk):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 9, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 9, Most Impacted Environmental Degradation: Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Does not describe how this disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Submission does not describe the damage to the environment from this Qualified Disaster. USACE report provided describes risks from erosion, however it is dated 2009, before the qualifying disaster, and as such, does not describe damage from the disaster.

Deficiency – 9, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 9, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster and does not discuss whether damage to the environment cannot be addressed with existing resources. Does not describe remaining damage to the environment with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #10 (Shaktoolik):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 10, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to

document claim of most impacted.

Deficiency – 10, Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Does not describe how this disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Response does not provide access to studies referenced.

Deficiency – 10, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 10, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster. Does not describe remaining damage from the Qualified Disaster with a cost estimate for making repairs that is \$400,000 or greater or discuss how the damage to critical natural resources has not been addressed and cannot be addressed with existing resources. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #11 (Hughes):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 11, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 11, Most Impacted Environmental Degradation: Does not describe how environmental degradation caused by this Qualified Disaster threatens long-term recovery critical natural resources and does not describe how the damage places housing, infrastructure and/or economic revitalization at risk. Does not describe how this disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Response does not provide access to studies referenced.

Deficiency – 11, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 11, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster or discuss how damage to the environment

cannot be addressed with existing resources. Although some activities which could support recovery of critical natural resources are described, the submission does not describe remaining damage to the environment from this Qualified Disaster with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #12 (Teller):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 12, Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster or how it threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Study at link provided predates the qualifying disaster, and as such, does not describe how the disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster.

Deficiency – 12, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 12, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster, link the damage to the environment to the long-term recovery of critical natural resources or the risk to housing, infrastructure, and economic revitalization. Does not discuss how environmental damage cannot be addressed with existing resources. Does not describe remaining damage to the environment from this Qualified Disaster with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #13 (Elim):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and
- Disaster impacted an area with prior documented environmental distress.

Deficiency – 13, Most Impacted Environmental Degradation: Does not describe how environmental degradation from this Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Study at link provided predates the qualifying disaster, and as such, does not describe how this Qualified Disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster.

Deficiency – 13, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 13, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster or describe how the damage cannot be addressed with existing resources. Does not describe remaining damage to critical natural resources from the Qualified Disaster with a cost estimate for making repairs that is \$400,000 or greater. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #14 (Seward):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted an area with prior documented environmental distress.

Deficiency – 14, Most Impacted Housing: Most Impacted Housing: Does not describe a concentration of housing damage due to the eligible disaster causing damage to either a minimum of 100 homes or serious damage to a minimum of 20 homes.

Deficiency – 14, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 14, Most Impacted Environmental Degradation: Does not describe how environmental degradation threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Study at link provided predates the qualifying disaster, and as such, does not describe how the disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster.

Deficiency – 14, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster. Does not describe remaining damage to critical natural resources from the Qualified Disaster with a cost estimate for making repairs that is \$400,000 or greater. Does not discuss why existing resources cannot address damage to critical natural resources. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #15 (Fort Yukon):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households;
- Disaster impacted a federal target area or economically fragile area (tribal area); and

- Disaster impacted an area with prior documented environmental distress.

Deficiency – 15, Most Impacted Infrastructure: Describes infrastructure damage in an amount less than \$2M. Only data provided is a summary table of FEMA project worksheets. Does not include engineering report or estimate of expenditures to make in support of damage claim as required by Appendix G. Page at State link provided does not provide any specific information to document claim of most impacted.

Deficiency – 15, Most Impacted Environmental Degradation: Does not describe how environmental degradation caused by the Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Study at link provided predates the qualifying disaster, and as such, does not describe how the disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. Does not describe damage to the environment from this Qualified Disaster.

Deficiency – 15, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 15, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster. Does not describe remaining damage to the environment with a cost estimate for making repairs that is \$400,000 or greater and does not describe how damage to critical natural resources cannot be addressed with existing resources. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For Target Area #16 (Diomedes):

The identified geography meets the distress threshold on the basis of the following criteria:

- Disaster impacted low- and moderate-income households; and
- Disaster impacted a federal target area or economically fragile area (tribal area).

Deficiency – 16, Most Impacted Environmental Degradation: Does not describe how environmental degradation from the Qualified Disaster threatens long-term recovery critical natural resources and places housing, infrastructure and/or economic revitalization at risk. Study at link provided predates the qualifying disaster, and as such, does not describe how this Qualified Disaster resulted in significant degradation to the environment putting the housing, infrastructure, and/or economic drivers in the area and nearby areas in great harm for a future disaster. The submission does not describe the damage from this Qualified Disaster.

Deficiency – 16, Distressed Unemployment 125% or More National Rate: Documentation not provided as required by Appendix G.

Deficiency – 16, Environmental Distress: Distressed response does not include description of contaminated property cleaned, undergoing cleanup, or proposed for cleanup in the affected area.

Deficiency – 16, Unmet Recovery Need Environmental Degradation: Does not estimate environmental damage from the qualifying disaster. Does not describe remaining damage to critical natural resources with a cost estimate for making repairs that is \$400,000 or greater, and does not connect that damage to the Qualified Disaster. Does not discuss how existing resources cannot address damage from the Qualified Disaster to the environment. Does not provide a detailed report from a reputable public or private organization describing remaining damage with a certification after March 2014 that there is remaining damage of \$400,000 or more.

For all target areas that identified brownfields and other types of environmental distress, only brownfields was considered demonstration of prior environmental distress as required by Appendix G. HUD is taking this under review and will publicly issue a clarification of acceptable environmental distress soon.

Please note that your 45 day threshold review submission was optional. The Department provided this one-time courtesy review to help applicants identify a set of target areas by the Phase 1 deadline that could meet the threshold detailed in Appendix G “Most Impacted and Distressed and Unmet Recovery Needs Threshold Criteria and Instructions.” Any acceptance or deficiency noted in this letter does not replace the requirement for a full application submission at the Phase 1 deadline. All applicants are invited to adjust submissions to address deficiencies noted or for other reasons. Applicants may make changes or additions to their target areas and threshold responses before submitting a full Phase 1 application in March 2015. HUD’s review of the Phase 1 application will not be influenced by this optional submission.

The Department created two websites to assist communities with the NDRC and provide general climate resilience information. The NDRC site provides a link to the NOFA, technical and topical webinars, and Frequently Asked Questions. The site can be found at: <https://www.hudexchange.info/cdbg-dr/resilient-recovery>. The Community Resilience Resource portal provides resources, data, and research on climate resilience and can be found at: <http://hud.gov/resilience>.

The Department will also offer two webinar opportunities to learn about the most impacted, most distressed, and unmet recovery needs thresholds and to answer your questions. The schedules and instructions are posted at: <https://www.hudexchange.info/news/ndrc-webinar-series/>.

Additionally, the Rockefeller Foundation is offering technical assistance to eligible applicants. Information about Rockefeller Foundation technical assistance can be found at: <http://www.rockefellerfoundation.org/our-work/current-work/resilience/national-disaster-resilience-competition> or you may email: resilience.academy@rockfound.org.

The Department appreciates your interest in the NDRC and remains committed to assisting in the recovery from natural disasters by helping communities like yours to rebuild and increase their resilience to future disasters. If you or any members of your staff have any questions, please email the NDRC Team at ResilientRecovery@hud.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stanley Gimont". The signature is fluid and cursive, with the first name being more prominent.

Stanley Gimont
Director
Office of Block Grant Assistance

Enclosure: Threshold Summary Chart

Threshold Summary Chart

Applicants <u>without</u> a previous allocation of CDBG Disaster Recovery funds					
<u>MOST IMPACTED</u>		<u>Most Impacted AND DISTRESSED</u>		<u>Most Impacted and Distressed AND UNMET NEEDS</u>	
Housing	ACCEPT – 3 Deficiencies Found - 14	Disaster impacted low- and moderate-income households	ACCEPT – 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16	Housing	
Infrastructure	Deficiencies Found -1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15	Loss/shortage of affordable rental housing		Infrastructure	
Economic Revitalization		Disaster impacted a federal target area or economically fragile area.	ACCEPT (Tribal Area)- 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16 Deficiencies Found (Unemployment) -1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16	Economic Revitalization	
Environmental Degradation	Deficiencies Found -1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16	Disaster impacted an area with prior documented environmental distress	ACCEPT – 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15 Deficiencies Found -8, 16	Environmental Degradation	Deficiencies Found -1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16