

Exhibit B - Threshold Narrative

State of Illinois

ILExhibitBThreshold.pdf

General Section

The 31 census tracts defined by HUD's [CDBGRDR Appendix C](#) as most impacted and distressed areas are shown on the [Interactive ArcGIS Map](#). Since disasters throughout Illinois were widespread, the State reached out to all communities through their regional planning commissions to provide the opportunity to improve community resiliency through the state's NDRC application submittal. To address unmet needs in multiple distressed areas, 10 target areas are included in the application to make Illinois a safer and more resilient state.

Eligible Applicant

As per the NOFA, the State is listed in Section III A, as an Eligible Applicant (#15). This list of applicants is also provided in [CDBGRDR Appendix A](#).

Eligible County

A total of 88 of the 102 counties in Illinois were Major Declared counties between January 2011 and December 2013. The 10 target areas are located in 9 eligible counties. Alexandar, Massac, Pulaski and Jackson were declared a 2011 major disaster area in FEMA-1991-DR. Massac and Tazewell were declared a 2013 major disaster area in FEMA-4157-DR. Woodford, Bureau, LaSalle and Marshall were declared a 2013 major disaster in FEMA-4116-DR. These county declarations are documented per [CDBGRDR Appendix B](#) pages 9 -11

Unmet Recovery Needs, and Most Impacted and Distressed

Target Area 1: Carbondale

The Carbondale target area, located in Jackson County, consists of census tract 17077010900 that includes the northwest portion of the City of Carbondale.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 3 listed the tract with 49 housing units with seriously damage and 63 total units damaged , meeting the "Most Impacted"

characteristics for serious damage to housing units. Additionally, some damaged roads have been repaired, but not in a more resilient manner to prevent future damage and eliminate safety risks.

Distressed: The area meets the “Distressed” characteristic for concentration of housing damage since its listing in the HUD [CDBGGRDR Appendix C](#).

Unmet Recovery Needs: The Carbondale target area includes Unmet Recovery Needs of \$4,922,400 from two infrastructure projects that were repaired but not made more resilient due to lack of resources. Meridian Road was overtopped by up to 15 feet of floodwater for six weeks closing off the only access to local business, requiring them to close and placing a financial strain on the company and its employees. Some repairs have been made to the roadway, but it was not elevated to alleviate the businesses and roadway flood risk. A [Carbondale Engineering Report](#) with a cost estimates is provided.

Fox Farm and Airport Roads provide access to the Airport from Route 51. Both of these roads were overtopped for 10 days during the 2011 disaster. The Airport is home to a National Guard facility and the storage location for southern Illinois’s POD Hospital equipment. The Airport is also a developing business park. A [Carbondale Engineering Report](#) is provided for the Airport Road resiliency improvements.

The major thoroughfares of Grand Avenue and Walnut Street in Carbondale (State Route 13) also experiences major issues during heavy rain events due to limited outflow capacity into Piles Fork Creek. To be more resilient storm sewer and/or Piles Fork Creek improvements are needed to increase capacity. To increase the capacity of Piles Fork Creek and remove repetitive loss property from the floodplain, a commercial property at 828 East Main in Carbondale could be acquired, demolished, and the land used for storm water detention to alleviate flooding.

Other community resiliency needs that have been unmet include preparedness planning by individuals, churches and businesses which is intensified by the percentage of disadvantaged populations with increased unemployment, poverty, and poor health outcomes in this area. The area also lacks connections to emergency response resources and shelters. Reed Station Mobile Home Park is being acquired through a Hazard Mitigation Grant, but there are insufficient resources to convert the vacant floodplain property into a more resilient use such as a wetland.

Target Area 2: Alexander

The Alexander target area, located in Alexander County, consists of three census tracts (17003957700, 170039557800, and 17003957900) that include the communities of Cairo, Thebes and a highly populated unincorporated area known as Olive Branch.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 3 listed all three census tracts with a total 222 seriously damaged housing units and 717 damaged units, meeting the “Most Impacted” characteristics for serious damage and units damaged to housing units.

Distressed: The area also meets the “Distressed” characteristic for concentration of housing damage since its listing in the [CDBGRDR Appendix C](#), the Low to Moderate Income as shown in [CDBGRDR Appendix D](#) and for an economically fragile area since the county employment rate is 8.5% which exceeds the national average (5.6%) by more than 150% as shown from [IDES Unemployment](#).

Unmet Recovery Needs: The target area within Alexander County has several Unmet Recovery Needs in the area of public infrastructure totaling \$500,000 in unavailable funding as documented in the [Alexander Engineering Report](#). The Alexander County Ambulance Base is a substantially damaged structure located within the floodplain and is scheduled for buyout and demolition. However, insufficient funding is available to construct a new ambulance base

outside of the affected flood area to improve the community's resiliency and service provision. . The construction of the new base on property acquired with proceeds from the buyout is estimated at \$300,000.

To recover from the 2011 damage to the Cairo levees, the Cairo Drainage District has partnered with the Corps of Engineers to implement a project of flattening of the slopes on the levees around and near the City of Cairo. Construction of this \$1,000,000 project will be funded primarily by the Corp of Engineers if the Cairo Drainage District provides the necessary project rights of way. Insufficient local funding resources are available to acquire the project rights of way, estimated to cost \$150,000. Without the rights of way, this project will not proceed.

Target Area 3: Brookport

The Brookport target area, located in Massac County, consists of three census tracts (17127970200, 17127970300, and 1717970400) that include the communities of Brookport and Metropolis.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 3 listed the tracts with a total 203 seriously damaged housing units and 407 damaged units, meeting the "Most Impacted" characteristics for serious damage and units damaged to housing units.

Distressed: The area also meets the "Distressed" characteristic for concentration of housing damage since its listing in the HUD [CDBGRDR Appendix C](#) and the Low to Moderate Income as shown in [CDBGRDR Appendix D](#).

Unmet Recovery Needs: The Brookport target area has 44 housing unit in Brookport with Unmet Recovery Needs. [Brookport Windshield Surveys](#) were completed for these structures in March of 2015 by each homeowner.

Massac County, the City of Brookport in particular, is in the process of applying for CDBG-DR funding that will assist with the rehabilitation, repair, and construction of damaged, owner-occupied housing units located in the City of Brookport and the surrounding Massac County area that were damaged by the November 17, 2013 tornado. This allocation will address housing rehabilitation needs of low to moderate income, homeowner occupied housing units. Even with FEMA repair funds and the potential CDBG-DR housing rehabilitation funds, there are houses that remain in need of repair and reconstruction. There are 6 rental housing units in Brookport still in need of repair that cannot utilize CDBG-DR funds because they are rental units. These units provide housing for low to moderate income families. The lack of rental housing for low to moderate income families in Brookport has resulted in population decline and hampers the community's ability to recover economically in a disaster resilient manner. Opportunities also exist to relocate portions of Brookport that are at risk behind a large uncertified Ohio River levee to areas outside the potential flood risk of the Ohio River.

Target Area 4: Pulaski

The Pulaski target area, located in Pulaski County, consists of census tract 17153971100 that includes the communities of Pulaski and Ullin.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 4 listed the tracts with a total 45 seriously damaged housing units and 231 damaged units, meeting the "Most Impacted" characteristics for serious damage and units damaged to housing units.

Distressed: The area also meets the "Distressed" characteristic for concentration of housing damage since its listing in the HUD [CDBGRDR Appendix C](#), the Low to Moderate Income as shown in [CDBGRDR Appendix D](#) and for an economically fragile area since the

county employment rate is 7.7% which exceeds the national average (5.6%) by more than 135% as shown from [IDES Unemployment](#).

The target area in Pulaski County has a high incidence of unemployment, high percentages of poverty, and a large percentage of below standard housing. The area has also been plagued by continual population decline over the past 20 years. With the inability of housing units damaged through the 2011 flood to be repaired and/or replaced, the already limited quality housing stock has dwindled.

Unmet Recovery Needs: The Pulaski target area has 20 housing unit in Pulaski and Ullin with Unmet Recovery Needs as determined during the [Pulaski Windshield Survey](#). Nine homes surveys were completed for these structures in March of 2015.

Pulaski County did not receive any prior CDBG-DR funding allocations due to the rural nature of the target area. Housing repair and rehabilitation needs remain, especially in the isolated, rural areas that experienced severe flooding. There are approximately 25 homes, which are mixture of both owner occupied and rental units. These rental units are widely dispersed throughout the target area with varying degrees of remaining damage.

Target Area 5: Washington

The Washington target area, located in Tazewell County, consists of two census blocks (17179022200 and 17179022300) that include the community of Washington.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 4 listed the tracts with a total 145 seriously damaged housing units and 197 damaged units, meeting the “Most Impacted” characteristics for serious damage and units damaged to housing units.

Distressed: The area also meets the “Distressed” characteristic for concentration of housing damage since its listing in the HUD [CDBGRDR Appendix C](#). Please see Page A-102 of Attachment E (ILAttEmaps.pdf) for a map of tornado damage in Washington.

The Washington Estates neighborhood was devastated by an EF-4 tornado on November 17, 2013. About 130 homes and three apartment buildings in that subdivision alone were destroyed. Additionally, two other apartment buildings and numerous homes suffered major damage. The rebuilding of that area has begun but there are still dozen lots that are vacant and show the damage from the tornado.

Unmet Recovery Needs: The Washington target area has 28 housing unit in Washington with Unmet Recovery Needs was determined during the [Washington Windshield Survey](#). 16 Homes surveys were completed for these structures in February of 2015. Please see Page A-103 of Attachment E (ILAttEmaps.pdf) for a map showing these streets within the Washington Estates subdivision.

While Appendix C data indicates there were 197 housing units damaged and 144 of those sustained serious damage, this is only a small snapshot of the true damage. These numbers were only those that registered for FEMA to possibly receive Individual Assistance funding. It does not include all of those housing units that were directly impacted. City of Washington building permit data shows that more than 40 percent of those housing units have not begun reconstruction. Furthermore, a windshield survey of the Washington Estates subdivision shows more than 28 of the lots have yet to see construction commence. This includes three lots that formerly had apartment buildings totaling 36 units plus six other rental lots. These vacant lots can be found on streets: Bobolink, Eagle, Elgin, Fayette, Flossmoor, Gillman, and Hawk.

Target Area 6: Roanoke

The Roanoke target area, located in Woodford County, consists of one census block (17203030300) that includes the Village of Roanoke.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 4 listed the tracts with a total of 26 seriously damaged housing units and 82 damaged units, meeting the “Most Impacted” characteristics for serious damage to housing units. Please see page A-104 of Attachment E (ILAttEmaps.pdf) for a map of the impacted area in Roanoke.

Distressed: The area also meets the “Distressed” characteristic for concentration of housing damage since its listing in the [CDBGRDR Appendix C](#).

On April 17, 2013 West Panther Creek and field drainage ditches that connect to the creek began flooding; some areas had up to 4 feet of water which affected 55 homes and 7 businesses resulting in \$2.4 million in expenses for cleanup and damages of which only 10% were covered by insurance claims. The Village of Roanoke incurred damages to 9 facilities or structures resulting in \$430,000 in expenses for cleanup and damages, of which 31% were covered by insurance claims.

Unmet Recovery Needs: The Roanoke target area has 5 businesses, 5 government buildings and 26 housing units with Unmet Recovery Needs as determined from the [Roanoke Windshield Survey](#). Home surveys were completed for these structures in March of 2015 by each homeowner.

Twenty six (26) of the homes, businesses and government structures were repetitive flood loss structures. Twenty-three (23) houses in the Low and Moderate Income Range were affected by the flooding and those homeowners cannot afford to move out of a residence that they have put equity in for a number of years. Two houses and the American Legion Building (used for

large meetings, village emergency shelter, village caucuses, elections and other civic functions) have been abandoned. B.J. Fehr’s Welding Shop, the Roanoke Village Hall, Offices, the Ambulance Building, and Storage Buildings were also flooded.

Target Area 7: Spring Valley

The Bureau County target area, located in Bureau County, consists of census tract 17011965200 that includes the community of Spring Valley.

Most Impacted: The community of Spring Valley suffered \$2,559,963 in damages to its wastewater treatment plant as a result of the April 2011 event meeting the infrastructure threshold in the “Most Impacted” category. A [Spring Valley FEMA Worksheet](#) is provided from documentation.

Distressed: The area meets the “Distressed” characteristic for Low to Moderate Income as shown in [CDBGRDR Appendix D](#) and for an economically fragile area since the county employment rate is 7.4% which exceeds the national average (5.6%) by more than 125% as shown from [IDES Unemployment](#).

Unmet Recovery Needs: The Bureau target area has \$639,991 in unmet recovery need according to the [Spring Valley FEMA Worksheet](#) for the April 2013 event. The Spring Valley Wastewater Treatment Plant is a critical infrastructure that serves a vulnerable population and is a critical component to public health.

Target Area 8: Marseilles

The Marseilles target area, located in LaSalle County, consists of census blocks 17099963700 that includes the communities of, Marseilles and Seneca.

Most Impacted: The HUD [CDBGRDR Appendix C](#) page 3 listed the tract with a total of 173 seriously damaged housing units and 245 damaged units, meeting the “Most Impacted” characteristics for serious damage and units damaged to housing units.

Distressed: The area also meets the “Distressed” characteristic for concentration of housing damage since its listing in the HUD [CDBGRDR Appendix C](#), the Low to Moderate Income as shown in [CDBGRDR Appendix D](#) and for an economically fragile area since the county employment rate is 7.8% which exceeds the national average (5.6%) by more than 125% as shown from [IDES Unemployment](#).

Unmet Recovery Needs: The Marseilles target area has 22 housing units in Marseilles with Unmet Recovery Needs. [Twenty-two homes surveys](#) were completed for these structures in March of 2015.

Target Area 9: Ottawa

The Ottawa target area, located in LaSalle County, consists of census block 17099962700 located within the community of Ottawa.

Most Impacted: Within the City of Ottawa, the city documented 497 reports of flood damage due to the April 25, 2013 event. The City of Ottawa has provided the [City Damage Map](#) documenting the location of these properties, meeting the “Most Impacted” characteristics for damaged housing units.

Distressed: The area also meets the “Distressed” characteristic for the Low to Moderate Income as shown in [CDBGRDR Appendix D](#) and for an economically fragile area since the county employment rate is 7.8% which exceeds the national average (5.6%) by more than 125% as shown from [IDES Unemployment](#).

Unmet Recovery Needs: The Ottawa target area has 26 housing units in the City of Ottawa with Unmet Recovery Needs as determined by the [Ottawa Windshield Survey](#). Nine home surveys were completed for these structures in March of 2015.

Target Area 10: Marshall

The Marshall target area, located in Marshall County, consists of four census tracts (17123961100, 17123961200, 17123961300 and 17123961400) that include the communities of Henry, Lacon, and Sparland.

Most Impacted: During the April 2013 flood, the Marshall area has suffered \$2,472,550 in damages per the [Marshall IEMA Worksheet](#).

Distressed: The area also meets the “Distressed” characteristic for the Low to Moderate Income for Census Blocks 171239612002 and 171239612003 as shown in [CDBG RDR Appendix D](#).

Unmet Recovery Needs: The Marshall target area has \$1,177,227 in an approved amount in the FEMA Project Worksheet while only showing \$882,920 in Federal Share Approved. This results in an unmet need for the target area of \$294,306 in Category C expenses as shown in the [Marshall FEMA Worksheet](#).

Aggregated Unmet Recovery Needs

Within all the target areas includes unmet recovery needs for infrastructure, housing, and economic revitalization as documented in each of the listed target areas. Unmet infrastructure needs were documented at \$5,716,706 in the target areas of Carbondale, Alexander, and Marshall. Unmet housing needs were documented at 166 units in the target areas of Brookport, Pulaski, Washington, Roanoke and Marseilles. Unmet economic revitalization needs were documented for 5 businesses in the target area of Roanoke. Beyond the criteria of the

competition, but impactful to the community, Roanoke did sustain damages to 5 government and public buildings. While damage to government buildings do not qualify as an unmet need per Appendix G of the NOFA, the results have increased burdens for all community tax-payers and will have continued damages unless the issues are addressed in a resilient manner.

Eligible Activities

All activities proposed in phase 2 that are funded using CDBG funds will meet the three criteria of 1) authorized categories of basic eligibility, 2) properly classified activity and 3) adequate documentation required by the category.

Proposal Incorporates Resilience

All proposed activities within the State proposal will improve the most impacted and distress area from qualifying disasters by incorporating design measure that account for current and future threats including the impacts of climate change. These activities are mentioned in the **Error! Reference source not found.** in Factor 3.

National Objective

The activities and proposed projects that will be developed within the Phase 2 plans for each target area will meet at least one of the three national objectives of the CDBG program. These three national objectives are benefiting low- and moderate- income persons; preventing or eliminating slums or blight; and meeting urgent needs. The target area proposals will focus on benefiting low- and moderate- income persons and preventing or eliminating slums or blight.

The floodplains and flood prone areas throughout Illinois are often the residential areas for Illinois' vulnerable population. Each project incorporates improvements to those areas for the future benefit of the area and the community.

Overall Benefit

The State ensures that the proposed activities from the target areas will direct over 50 percent of its funds to benefit low- and moderate-income persons.

Tie-back

All proposed activities in phase 2 utilizing CDBG-NDR funding will demonstrate that the activity will address an unmet need from a Qualified Disaster.

One Application per Applicant

The State understands that only one application may be submitted per applicant.

Certifications

The State of Illinois has included a signed and dated copy of the Certifications as presented in the NOFA Appendix F. This document is included in the application as Attachment C - Certifications (AttCCertifications.pdf).