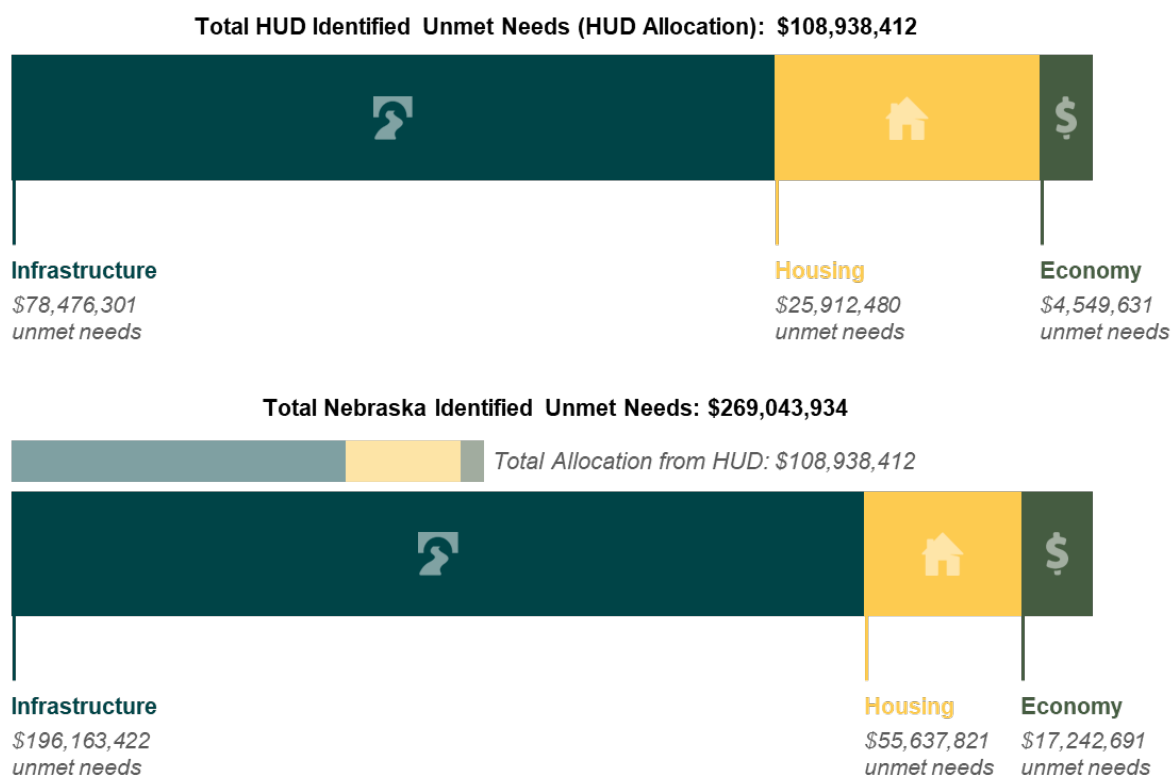


2 UNMET NEEDS ASSESSMENT

2.1 INTRODUCTION AND BACKGROUND

Through the Additional Supplemental Appropriations for Disaster Relief Act 2019,¹⁰ HUD allocated the State of Nebraska \$108,938,000 to address housing, infrastructure, and economic recovery unmet needs¹¹ and to support the long-term recovery efforts following the 2019 disasters.¹² Grantees, such as the State of Nebraska, that are awarded CDBG-DR funding after a major disaster declaration are provided an allocation of funding based on unmet needs as defined and calculated by HUD, using damage estimates reported by FEMA and the US Small Business Administration (SBA). Nebraska's \$108,938,000 allocation represents the aggregate of unmet infrastructure needs, serious unmet housing needs in the Most Impacted and Distressed (MID) areas (see section 2.2.2), and serious unmet economic revitalization needs as calculated by HUD (Figure 2-1).

Figure 2-1: HUD and Nebraska Determined Unmet Needs



¹⁰ Per Public Law 116-20.

¹¹ The unmet need is defined as the anticipated gap in estimated costs of damage and the federal assistance that can be met with local and state contributions and/or other sources.

¹² Allocations, Common Application, Waivers, and Alternative Requirements for Disaster Community Development Block Grant Disaster Recovery Grantees, 85 Fed. Reg. 17 (January 27, 2020). *Federal Register: The Daily Journal of the United States*. Web. 27 January 2020.

2.1.1 UNMET NEEDS ASSESSMENT PURPOSE

Grantees who receive an allocation through the CDBG-DR program are required to conduct an Unmet Needs Assessment (UNA) to assist in the identification and prioritization of critical unmet needs following a disaster and to identify long-term recovery efforts that will mitigate against future disasters. The goal is to enable the grantee to design recovery programs to meet the needs of its citizens and to be responsive to the types and locations of actual needs on the ground. As a grantee, the State of Nebraska must use the funds allocated in a strategic manner, utilizing the funding in the most-impacted, vulnerable areas while addressing a wide range of projects and needs throughout the impacted areas.

The UNA analyzes short- and long-term impacts of the disaster, assesses immediate recovery needs of the communities affected, and describes the ongoing recovery efforts. The assessment also includes mitigation and resilience measures for long-term planning. The analysis of unmet needs will evolve over time and will be re-evaluated as assistance is provided and needs shift.

The UNA presents findings based on best available data at the time of publication. These findings represent a point-in-time snapshot of disaster impacts and are subject to change as new data is collected or identified. The maps and graphics contained in this report are intended to help synthesize available information to convey the scale and location of impacts; however, no single map or image can effectively summarize the impacts of the 2019 disasters. These images are intended to supplement the narrative contained within the report.

2.1.2 CALCULATING UNMET NEEDS

CDBG-DR funds are intended to primarily address unmet needs in the HUD-defined Most Impacted and Distressed (MID) areas with a focus on housing for low- and moderate-income (LMI) households and individuals.¹³ HUD defines LMI as households and individuals that are at or below 80% of the area median income (AMI). The following sections describe how HUD determines which areas represent the HUD-defined MID and how unmet infrastructure needs, serious unmet housing needs, and serious unmet economic revitalization needs are calculated by HUD.

2.1.2.1 DETERMINING THE MOST IMPACTED AND DISTRESSED AREAS

In accordance with the Federal Register¹⁴ and statutory requirements, HUD is required to identify the MID areas and directs grantees to use a majority of their award (no less than 80% of the total allocation) in these areas. HUD also takes into consideration:

- **Individual Assistance (IA) Individuals and Households Program (IHP) designation.** HUD partially bases its funding allocations on damage estimates in areas where FEMA determined damage was sufficient to declare the county as eligible

¹³ 85 Fed. Reg. 17 (January 27, 2020).

¹⁴ Ibid.

to receive IHP funding. IHP is a FEMA program that provides financial and direct services to eligible individuals and households affected by a disaster who have uninsured or underinsured necessary expenses and serious needs.

- **Concentrated damage.** HUD estimates *serious unmet housing needs* in counties and zip codes with high levels of damage, collectively referred to as MID areas. For this allocation, HUD defines the MID areas as either most impacted counties—counties exceeding \$10 million in serious unmet housing needs—and most impacted zip codes—zip codes with \$2 million or more of serious unmet housing needs.
- **Disasters meeting the most impacted threshold.** HUD provided funds to 2018 and 2019 disasters that met the “most impacted” damage threshold described above.

Serious unmet housing needs are defined as: FEMA-inspected housing units with damage that exceeds the major-low threshold for real property or personal property damage (Table 2-1). It is relevant to note that this data does not account for whether a household is low- to moderate-income (refer to sections 2.3.2 and 2.4.2 for further discussion).

While 80% of the total allocation must benefit the HUD-defined MID area, the remaining 20% may be directed to benefit the “State-defined MID area”. Appendix B: Eligible Areas includes a complete list of counties included within the State-defined MID area (refer to section 2.1.2 for further discussion).

Table 2-1: HUD Damage Categories

| Category | | Real Property Damage | Personal Property Damage | Minimum Cost Multiplier ¹⁵ |
|-----------------------------|------------|--|--|---------------------------------------|
| Minor-Low | | Less than \$3,000 | Less than \$2,500 | N/A |
| Minor-High | | \$3,000 to \$7,999 | \$2,500 to \$3,499 | N/A |
| Serious Unmet Housing Needs | Major-Low | \$8,000 to \$14,999 | \$3,500 to \$4,999 | \$40,323 |
| | Major-High | \$15,000 to \$28,800 | \$5,000 to \$9,000 | \$55,812 |
| | Severe | Greater than \$28,800 destroyed or 6+ feet of flooding | Greater than \$9,000, destroyed or 6+ feet of flooding | \$77,252 |

2.1.2.2 IDENTIFICATION OF PRE-DISASTER HOMELESSNESS

In addition to its review of unmet needs generated by the floods, the unmet needs assessment took into consideration pre-disaster homelessness. According to HUD, approximately 2,421 people are experiencing homelessness in the State of Nebraska based on the 2020 Point-in-Time count, which is only a limited increase compared to the 2019 count.¹⁶ Most individuals without homes are sheltered, with only about six percent of individuals being unsheltered at any given

¹⁵ Allocations, Common Application, Waivers, and Alternative Requirements for Community Development Block Grant Disaster Recovery Grantees, 83 Fed. Reg. 157 (August 14, 2018). *Federal Register*. Retrieved at <https://www.govinfo.gov/content/pkg/FR-2018-08-14/pdf/2018-17365.pdf>.

¹⁶ United States Department of Housing and Urban Development, 2018. “PIT and HIC Data Since 2007.” Retrieved at: <https://www.hudexchange.info/resource/3031/pit-and-hic-data-since-2007/>.

time. These statistics indicate that 0.13 percent of the state's population is experiencing homelessness.

Data from 2019 identifies that at the time of the floods, an estimated 2,365 persons were experiencing homelessness pre-disaster, including 201 family households, 175 Veterans, 151 unaccompanied young adults, and 454 individuals in a state of chronic homelessness, per reporting by the Continuums of Care to HUD.¹⁷ Figures in the MID area, as represented by the Omaha, Council Bluffs Continuums of Care area,¹⁸ reflect consistent rates of homelessness in 2018 and 2019, with approximately 1,410 individuals reported as experiencing homelessness for both years.¹⁹

To support services for these populations, the Affordable Housing Construction Program will incorporate opportunities that may provide benefit to households experiencing homelessness, as reflected in the program's scoring criteria.

2.1.2.3 POST-DISASTER HOUSING DAMAGE

Post-disaster housing damage is calculated using data obtained by FEMA and SBA from housing inspections completed on damaged properties as of November 1, 2019. Based on the amount of real and personal property damage, HUD categorizes each inspected unit into five categories (Table 2-1). The calculation HUD uses to determine unmet housing needs is based on verified damage above the Major-Low threshold in the HUD-defined MID areas (Table 2-2).

Table 2-2: HUD Total Serious Unmet Need Estimate²⁰

| County | | Zip Codes | Estimated Serious Unmet Housing Needs | | | |
|----------------------|---------|---------------|---------------------------------------|-------------------------|--------|-------|
| | | | Value | Number of Housing Units | | |
| | | | | Owner | Renter | Total |
| HUD-Defined MID Area | Dodge | 68025 | \$4,961,936 | 137 | 32 | 169 |
| | Douglas | 68064 | \$4,659,244 | 100 | 31 | 131 |
| | | 68069 | \$2,287,482 | 58 | 5 | 63 |
| | Sarpy | Entire County | \$14,003,818 | 280 | 67 | 347 |
| Total | | | \$25,912,480 | 575 | 135 | 710 |

The UNA calculated the total levels of unmet need resulting from the 2019 floods for all inspected properties with reported damage to demonstrate the total impact to the State of Nebraska, as

¹⁷ United States Interagency Council on Homelessness. 2019. Nebraska Homelessness Statistics. Retrieved from [https://www.usich.gov/homelessness-statistics/ne/#:~:text=As%20of%20January%202019%2C%20Nebraska,and%20Urban%20Development%20\(HUD\).](https://www.usich.gov/homelessness-statistics/ne/#:~:text=As%20of%20January%202019%2C%20Nebraska,and%20Urban%20Development%20(HUD).)

¹⁸ The Omaha Council Bluffs covers MID areas Douglas and Sarpy Counties.

¹⁹ HUD Exchange. 2019. "2007-2019 Point in Time Estimates by CoC." Retrieved at <https://www.hudexchange.info/resource/5948/2019-ahar-part-1-pit-estimates-of-homelessness-in-the-us/>

²⁰ The information provided in Table 2-2 is based on HUD's original assessment, which was completed at a different point in time than the UNA completed for this Action Plan.

reflected in Table 2-3. This information was captured at a later point in time than HUD's original assessment to reflect updated data.

Table 2-3: Details of UNA Calculated Housing Damage by Unit

| Category | | HUD-Defined MID Area | State-Defined MID Area | All Areas (Total) |
|-----------------------|------------|----------------------|------------------------|-------------------|
| Minor-Low | | 789 | 1,111 | 1,900 |
| Minor-High | | 384 | 432 | 816 |
| Serious Damages | Major-Low | 259 | 212 | 471 |
| | Major-High | 253 | 106 | 359 |
| | Severe | 178 | 37 | 215 |
| Total All Damages | | 1,863 | 1,898 | 3,761 |
| Total Serious Damages | | 690 | 355 | 1,045 |

DED calculated the total cost of serious damages using the multipliers identified in the Federal Register Notice published August 14, 2018 (Table 2-4). Based on this calculation, the UNA identified 1,045 total units impacted in all areas resulting in a total \$55,637,821 in unmet needs.

Table 2-4: Total Cost of UNA Calculated Serious Unmet Need

| Category | | Multiplier | HUD-Defined MID Area Units | HUD-Defined MID Area Cost | State-Defined MID Area Units | State-Defined MID Area Cost | Total MID Area Units | Total MID Area Cost |
|-----------------|------------|------------|----------------------------|---------------------------|------------------------------|-----------------------------|----------------------|---------------------|
| Serious Damages | Major-Low | \$40,323 | 259 | \$10,443,657 | 212 | \$8,548,476 | 471 | \$18,992,133 |
| | Major-High | \$55,812 | 253 | \$14,120,436 | 106 | \$5,916,072 | 359 | \$20,036,508 |
| | Severe | \$77,252 | 178 | \$13,750,856 | 37 | \$2,858,324 | 215 | \$16,609,180 |
| Total Damages | | | 690 | \$38,314,949 | 355 | \$17,322,872 | 1,045 | \$55,637,821 |

As summarized in Table 2-2, FEMA data indicates that 80% of the damages were reported for owner-occupied units and 20% were reported for renter-occupied units. These figures are discussed further in section 2.4.2.1.1, which provides an overview of the demographics represented in the FEMA data.

2.1.2.4 UNMET NEED ESTIMATING FACTORS

DED and NIFA worked alongside federal partners (e.g., HUD, FEMA, USDA), local jurisdictions, and a consortium of volunteer agencies to assess unmet needs and assist communities with rebuilding. DED staff assisted in the formation of, and continue to participate in, the Long-Term

Recovery Groups (LTRG). The ongoing efforts of these groups demonstrate that many alternative private, public, and non-profit resources have and continue to address a significant amount of unmet need resulting from the flood events.

Many residents lacked adequate insurance, with approximately 81.7% of homeowners lacking flood insurance and 23.3% lacking general home insurance. More than 95% of renters lacked flood and renter insurance (98.2% and 97.4%, respectively).²¹ For households with flood insurance, NFIP data indicates that 1,026 claims that were paid out after the 2019 disaster with \$5,994,846 in advance payments and \$39,673,497 in total payments as of July 29, 2019, the date of the final Claims Estimate Report associated with the disaster.²² Federal assistance was provided through multiple FEMA assistance programs, as well as FEMA's ongoing HMGP (see also 2.4.4 Federal Assistance for additional detail).

Table 2-5 outlines the number of FEMA and SBA applicants based on the HUD Unmet Need determination analysis, as well as the level of insurance coverage in MID areas, where NFIP estimates reflected the greatest number of claims of any areas affected in the state. This analysis considers the number of applicants with insurance coverage and who were approved for an SBA loan in the MID areas.

Table 2-5: HUD Unmet Need Estimating Factors in Counties with IA Declarations

| County | Insurance Coverage | | SBA Loans | | HUD Category | | |
|--------------------|--------------------|--------------|-----------------|--------------|------------------|-------------------------|------------|
| | Number of Claims | | Number of Loans | | Number of Claims | | |
| | Homeowners | NFIP | Applied | Approved | Real Property | Personal Property Owner | Renter |
| Dodge | 676 | 319 | 441 | 189 | 832 | 86 | 77 |
| Douglas | 666 | 222 | 466 | 206 | 623 | 136 | 55 |
| Sarpy | 552 | 201 | 609 | 283 | 398 | 264 | 172 |
| Remaining Counties | 2,374 | 290 | 1,119 | 559 | 2,561 | 184 | 67 |
| Total | 4,268 | 1,032 | 2,635 | 1,237 | 4,414 | 670 | 371 |

2.1.2.5 REMAINING SERIOUS UNMET HOUSING NEEDS

HUD conducted an unmet needs assessment that captured the total serious unmet housing needs in the HUD-defined MID area in December 2019. HUD identified 710 total units in their unmet need calculation. The State conducted its UNA at a later point in time, during which 690 total units were identified as still requiring assistance in the HUD-defined MID area (see Table 2-3). To determine how many of these units would require funding through the CDBG-DR program, DED conducted a data analysis to review the total number of homes served through existing State housing programs.

²¹ Application and inspection data obtained from FEMA database last updated 10/30/2020.

²² Nebraska Emergency Management Agency, February 7, 2020. "FEMA-4420-DR-NE Weekly Unified Recovery Outcomes Dashboard."

Since the 2019 floods, the State's active housing programs have prioritized the needs of disaster-impacted families and implemented many projects in HUD-defined MID areas. DED moved quickly in 2019 to use an open Nebraska Affordable Housing Trust Fund (NAHTF) funding round to establish a disaster funding priority. This action required an amendment to the Qualified Allocation Plan (QAP) and public comment period. Additionally, scoring priority for disaster related projects was incorporated into the joint NIFA and DED LIHTC/HOME/HTF funding program for 2020 applications received in the fall of 2019. NIFA launched its First Home Grant program in 2020.

Included in these housing programs are efforts and prioritization to specifically address the needs of vulnerable populations. For example, NAHTF and HUD's Emergency Solutions Grant (ESG) fund the Nebraska Homeless Assistance Program (NHAP) to serve the needs of persons experiencing homelessness across the state. NHAP reserves \$75,000 annually of the Homeless Shelter Assistance Trust Funds to be distributed in the event of a natural disaster to assist individuals and families that are homeless and at risk of homelessness due to the effects of a natural disaster within the State of Nebraska. In instances where natural disaster relief funds are not necessitated within the program year, the legislatively established set-aside funds of \$75,000 are allocated for the subsequent fiscal year to maintain the natural disaster relief fund.

Specific planning documentation and details regarding these funds' prioritization of disaster survivors are reviewed in Table 2-6. The total number of projects prioritizing disaster-impacted households in HUD-defined MID areas that have been directly funded through 2019 and 2020 funding rounds are detailed in Table 2-7.

Table 2-6: State Housing Program Support to Disaster Survivors

| Fund | Disaster Survivor Accommodations |
|---|--|
| Nebraska Affordable Housing Trust Fund | NAHTF Activities for the 2019 funding cycle included designated funding for Disaster Recovery Housing Projects totaling 27% of the overall NAHTF budget. ²³ The 2020 Qualified Allocation Plan also prioritizes Disaster Recovery efforts through the Program's selection criteria. ²⁴ |
| HOME, HTF, and CRANE | HOME, HTF, and CRANE funds are administered per the 2015-2019 Consolidated Plan, which incorporates scoring criteria to prioritize communities designated as natural disaster areas. ²⁵ |
| CDBG Owner Occupied Rehabilitation Fund | CDBG OOR funds are directed per the 2020-2024 Consolidated Plan for Housing and Community Development, which identifies families impacted by natural disasters as a priority. ²⁶ |
| Nebraska Rural Workforce Housing Fund | The NRWHF program addresses moderate-income, affordable housing needs and includes activities implemented in HUD-defined MID areas. ²⁷ |

While the COVID-19 pandemic has impacted the timelines for efforts by volunteer organizations and the construction workforce, the Governor's Task Force estimates that up to 70 disaster-impacted homes were being completed per month by volunteer organizations prior to the pandemic. For example, Habitat for Humanity of Omaha has completed repairs or reconstruction to 31 homes, with 37 homes in progress. These efforts continue, and the Governor's Task Force reports that approximately 177 units have been repaired or reconstructed to date by volunteer organizations. Habitat for Humanity of Omaha currently plans to repair at least 25 additional homes. Based on these and other LTRG reports, volunteer efforts are expected to accelerate as the construction season resumes in early 2021.

Table 2-7 details how various programs are expected to address remaining unmet housing needs. These programs will focus on permanent housing needs, as DED did not identify remaining interim housing needs during the unmet needs assessment. The table does not account for the activities of volunteer organizations as discussed above due to the lack of specific projections from the full universe of volunteer organizations. However, as indicated, approximately 177 units have been repaired or rebuilt to date and volunteer organizations, and the activities of these organizations are expected to increase in the spring of 2021 as the construction season resumes and limitations associated with the COVID-19 pandemic are potentially eased.

²³ DED. 2019. "National Affordable Housing Trust Fund 2019 Qualified Allocation Plan Amendment." Retrieved at <https://opportunity.nebraska.gov/wp-content/uploads/2019/04/2019-Amendment.pdf>.

²⁴ DED. 2020. "National Affordable Housing Trust Fund Qualified Allocation Plan." Retrieved at <https://opportunity.nebraska.gov/wp-content/uploads/2020/02/2020-NAHTF-QAP-FINAL.pdf>

²⁵ DED and NIFA. 2019. "State of Nebraska Appendix for 2015-2019 Consolidated Plan & 2015 AAP." Retrieved at https://opportunity.nebraska.gov/wp-content/uploads/2017/05/Appendix_EDITS_FINAL_2015.pdf.

²⁶ DED and DHHS. 2020. "State of Nebraska Consolidated Plan for Housing and Community Development." Retrieved at https://opportunity.nebraska.gov/wp-content/uploads/2020/06/Nebraska_Consolidated-Plan_20-24_20200612.pdf.

²⁷ State of Nebraska. 2020. "Gov. Ricketts, DED Open Application Period for Second Round of Rural Workforce Housing Grants." Retrieved at <https://opportunity.nebraska.gov/gov-ricketts-ded-open-application-period-for-second-round-of-rural-workforce-housing-grants/>

Table 2-7: Calculation Breakdown to Determine Estimated Serious Unmet Housing Needs in MID Areas²⁸

| UNA Estimates of Remaining Serious Unmet Need | | | | | |
|---|--|-------------------------------|-----------------------------|---------------------------|--------------------------------|
| Data Source | | Number of Housing Units | | | Unmet Need in All Areas (\$) |
| | | Unmet Need in State MID Areas | Unmet Need in HUD MID Areas | Unmet Need in All Areas | |
| A | UNA Estimate of Remaining Unmet Need in MID Areas | 355 | 690 | 1,045 | \$55,637,821 |
| Estimated Impact of Nebraska Activities to Address Housing Needs | | | | | |
| Fund/Effort | | Number of Housing Units | | | Total Impact in All Areas (\$) |
| | | Impact in State MID Areas | Impact in HUD MID Areas | Total Impact in All Areas | |
| B | 2019 Nebraska Affordable Housing Trust Fund | 74 | 56 | 130 | \$6,259,200 |
| C | 2019 HOME CHDO Funding | 5 | 0 | 5 | \$503,885 |
| D | 2019 HOME/LIHTC | 79 | 68 | 147 | \$2,065,000 |
| E | 2019 HTF/CRANE | 0 | 23 | 23 | \$750,000 |
| F | 2019 CDBG Owner Occupied Rehabilitation Fund | 20 | 0 | 20 | \$547,000 |
| G | Nebraska Rural Workforce Housing Fund | 308 | 72 | 380 | \$4,494,100 |
| H | 2020 Nebraska Affordable Housing Trust Fund | 59 | 96 | 155 | \$5,945,000 |
| I | 2020 HOME CHDO | 7 | 0 | 7 | \$550,000 |
| J | 2020 HOME/LIHTC | 0 | 123 | 123 | \$2,591,000 |
| K | 2020 CDBG Owner Occupied Rehabilitation Fund | 18 | 0 | 18 | \$547,000 |
| L | Estimated Total Impact from Nebraska Housing Activities <i>(Sum of Rows B – K)</i> | 570 | 438 | 1,008 | \$24,252,185 |
| Estimated Remaining Unmet Needs <i>(Difference of Rows A & L)</i> | | 0 | 252 | 252* | \$31,385,636 |

*The estimated total remaining unmet need in all areas is calculated as the sum of remaining unmet need in State-identified MID areas and HUD-identified MID areas. Note that all of the identified State resources contribute to affordable housing in the impacted areas, and disaster impacted households were prioritized as described in this section. Precise data on the number of disaster impacted households versus other qualifying households benefiting from these programs was not available at the time of this analysis.

²⁸ Calculations completed using data for counties with IA declarations.

Due to limited funding, DED will address what HUD defines as serious damages (i.e., severe, major-high, and major-low) in unmet housing needs. These figures are summarized below in Table 2-8 with the estimated total impact reflecting the upper limit of housing units that may be assisted. The number of units assisted may differ from these figures based on total required investment per housing unit. Accounting for volunteer efforts and estimated CDBG-DR activities, available resources for housing program activities may ultimately exceed estimated unmet needs.

Table 2-8: CDBG-DR Funding to Address Remaining Unmet Needs

| | Total Estimated Impact in All Disaster-Impacted (IA) Areas | | | |
|---|--|---------------|------------|-----------------------|
| | Number of Housing Units | | | Value/Investment (\$) |
| | State MID Areas | HUD MID Areas | Total | |
| Total Remaining Unmet Need (See Table 2-7) | 0 | 252 | 252 | \$31,385,636 |
| CDBG-DR Housing Programs (As proposed in section 5) | 11 | 349 | 360 | \$37,000,000 |

2.1.2.6 SERIOUS UNMET ECONOMIC REVITALIZATION NEEDS

To estimate serious unmet economic revitalization needs, HUD analyzes SBA disaster loan data to create five categories of damage based on the combined verified real estate and content losses of the pool of applicants. Of the five categories HUD establishes, serious unmet needs include only Category 3 and above:

- Category 1: real estate + content loss = below \$12,000
- Category 2: real estate + content loss = \$12,000 - \$29,999
- Category 3: real estate + content loss = \$30,000 - \$64,999
- Category 4: real estate + content loss = \$65,000 - \$149,000
- Category 5: real estate + content loss = \$150,000 and above

For properties with real estate and content loss of \$30,000 or more (i.e., Category 3 and above), HUD calculates the estimated amount of unmet needs for small businesses by multiplying the median damage estimate by the number of small businesses denied an SBA loan. This amount includes those denied a loan prior to inspection due to inadequate credit or income (or where a decision had not been made), under the assumption that damage among those denied at pre-inspection have the same distribution of damage as those denied after inspection.

HUD's estimation of total unmet economic revitalization need equates to \$4,549,631 (based on data from November 2019). While this approach yields an estimate that seems appropriate for the extent of damage reported by SBA, there is concern for the small businesses that did not apply and may still need financial assistance. Further, the UNA considers all categories of economic revitalization needs, not just those associated with Category 3 or higher (Table 2-9).

Table 2-9: Comparison of HUD versus UNA Calculated Economic Revitalization Unmet Needs

| | HUD Serious Unmet Economic Recovery Need | UNA Calculated Economic Recovery Need | Difference (HUD vs. UNA Calculation) |
|-------------------------------|--|---------------------------------------|--------------------------------------|
| Unmet Need | \$4,549,631 | \$22,417,026 | \$17,867,395 |
| Total Business Disaster Loans | 39 | 1,398 | 1,359 |

2.1.2.7 UNMET INFRASTRUCTURE NEEDS

Infrastructure unmet needs are calculated by estimating the required state and local contribution (25%) of the cost to repair or reconstruct damaged permanent infrastructure (FEMA PA Categories C-G). These needs, as estimated by HUD, are represented in Table 2-10.

Table 2-10: Details of HUD Infrastructure Unmet Needs Calculation

| Category | Value |
|--|---------------|
| HUD Permanent Facilities (FEMA Cat C-G) Estimate | \$313,905,205 |
| Federal Share | \$235,428,904 |
| Local Share (Unmet Need) | \$78,476,301 |

These estimates were made in November 2019 and do not account for any additional damage reported after that date, nor does HUD's calculation include the cost of promoting resilience through FEMA HMGP (Table 2-21), underrepresenting the total infrastructure unmet needs (Table 2-11).

Table 2-11: Comparison of HUD versus UNA Calculated Infrastructure Unmet Needs

| | HUD Permanent Facilities (FEMA Cat C-G) Estimate | UNA Calculated Infrastructure Need | Difference (HUD to UNA Calculation) |
|------------|--|------------------------------------|-------------------------------------|
| Unmet Need | \$78,476,301 | \$196,163,422 | \$117,687,121 |

2.1.3 UNMET NEEDS ASSESSMENT SCOPE

The State of Nebraska's UNA informs how the State of Nebraska will utilize this allocation to address identified gaps. Table 2-12 shows the total proportion of unmet needs across housing, infrastructure, and economic revitalization.

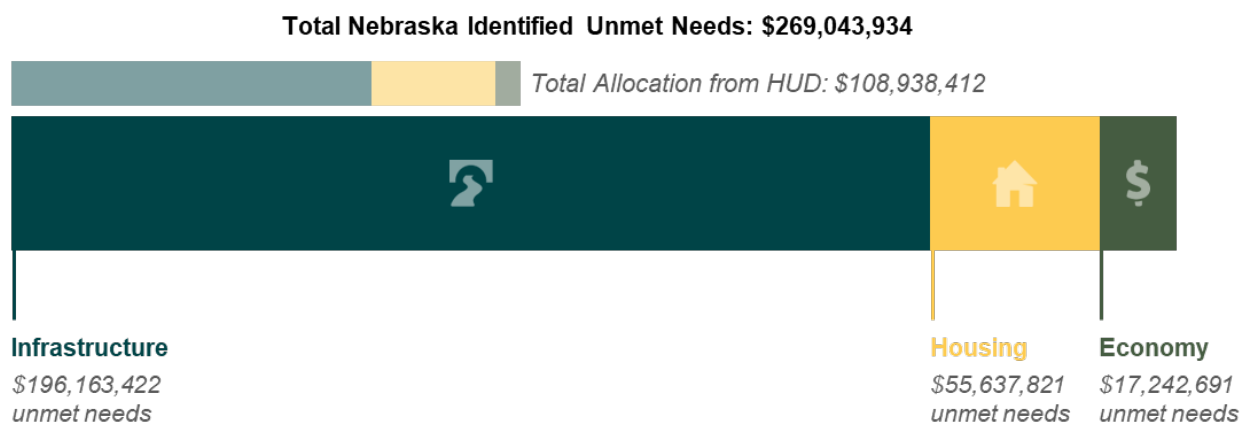
Table 2-12: Summary of Unmet Needs²⁹

| | Housing | Infrastructure | Economic Revitalization | Total |
|---------------------------------|--------------|----------------|-------------------------|---------------|
| Unmet Needs | \$55,637,821 | \$196,163,422 | \$17,242,691 | \$269,043,934 |
| Percentage of Total Unmet Needs | 21% | 73% | 6% | 100% |

²⁹ Housing data obtained from FEMA Database last updated 03/16/2020; infrastructure data obtained from NEMA PA projects data last updated 01/16/2020; economy data obtained from the Small Business Administration data last updated 03/10/2020.

The calculations in Figure 2-2 further show that the serious unmet housing needs account for 21% (\$55.6 million) of the State's total identified unmet needs; and unmet infrastructure needs account for roughly 73% (\$196.2 million) of the State's total identified unmet needs.

Figure 2-2: Nebraska's Unmet Needs and HUD's CDBG-DR Allocation



The data represents the State's estimated total unmet needs based on best data available during the development of this assessment. These estimates represent a point-in-time analysis that will continue to evolve and does not include unreported losses, which may be attributed to:

- Impacted individuals not applying for assistance to repair their damaged homes;
- Damage exacerbated before repairs could begin;
- Economic impacts as a result of the disaster; and
- Infrastructure repairs that are necessary but deemed ineligible for federal assistance.³⁰

Throughout the State, recovery efforts have been taken and continue to be initiated for public and private housing and infrastructure facilities. Local jurisdictions reported having completed repairs on homes that were damaged or destroyed as well as repairing infrastructure facilities. Estimates of housing needs address through state and federal funds are outlined above in Table 2-7.

2.2 IMPACTED COUNTIES

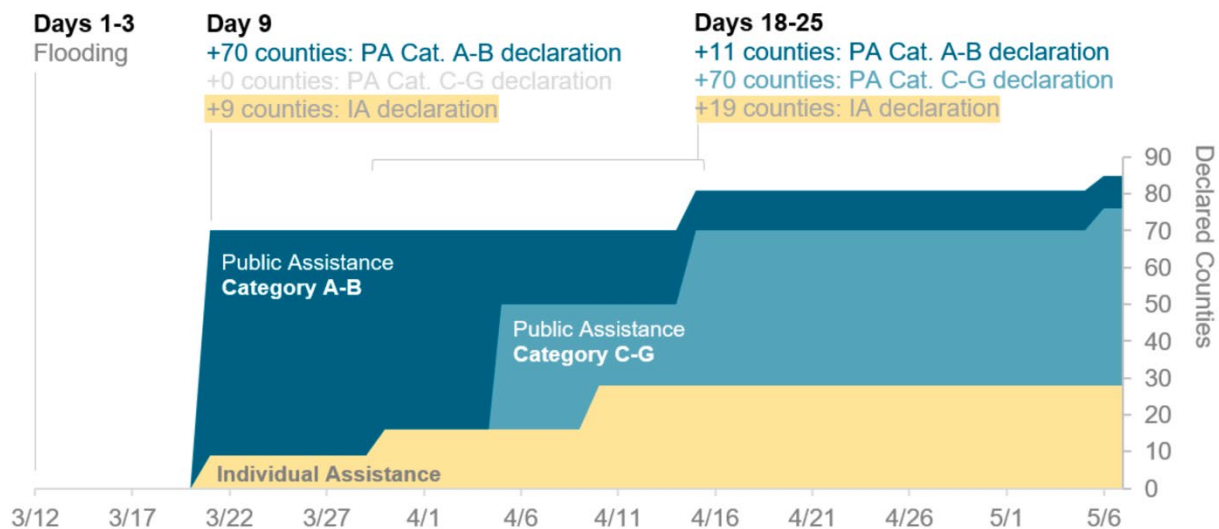
FEMA and HUD designate certain eligible counties to receive financial assistance based on the damage caused by the disaster. The initial determination is made by FEMA, designating certain counties as eligible to receive assistance at a much broader level than HUD. HUD focuses on the areas determined to have sustained the most impact as a result of the disaster. To receive federal financial assistance, counties must first have a designation with FEMA.

³⁰ Note this list is not comprehensive of all potential sources of unreported loss.

2.2.1 ELIGIBLE COUNTIES

The disaster declaration for Winter Storm Ulmer through FEMA made available financial assistance to certain eligible counties determined to have sustained damage from the impact of the storm. The initial declaration designated nine counties eligible to receive assistance for individuals and 69 counties to receive financial assistance for emergency protective measures in the immediate aftermath of the disaster. Between March and July 2019, through a series of amendments after the original disaster declaration, the number of eligible counties expanded over time (Figure 2-3).

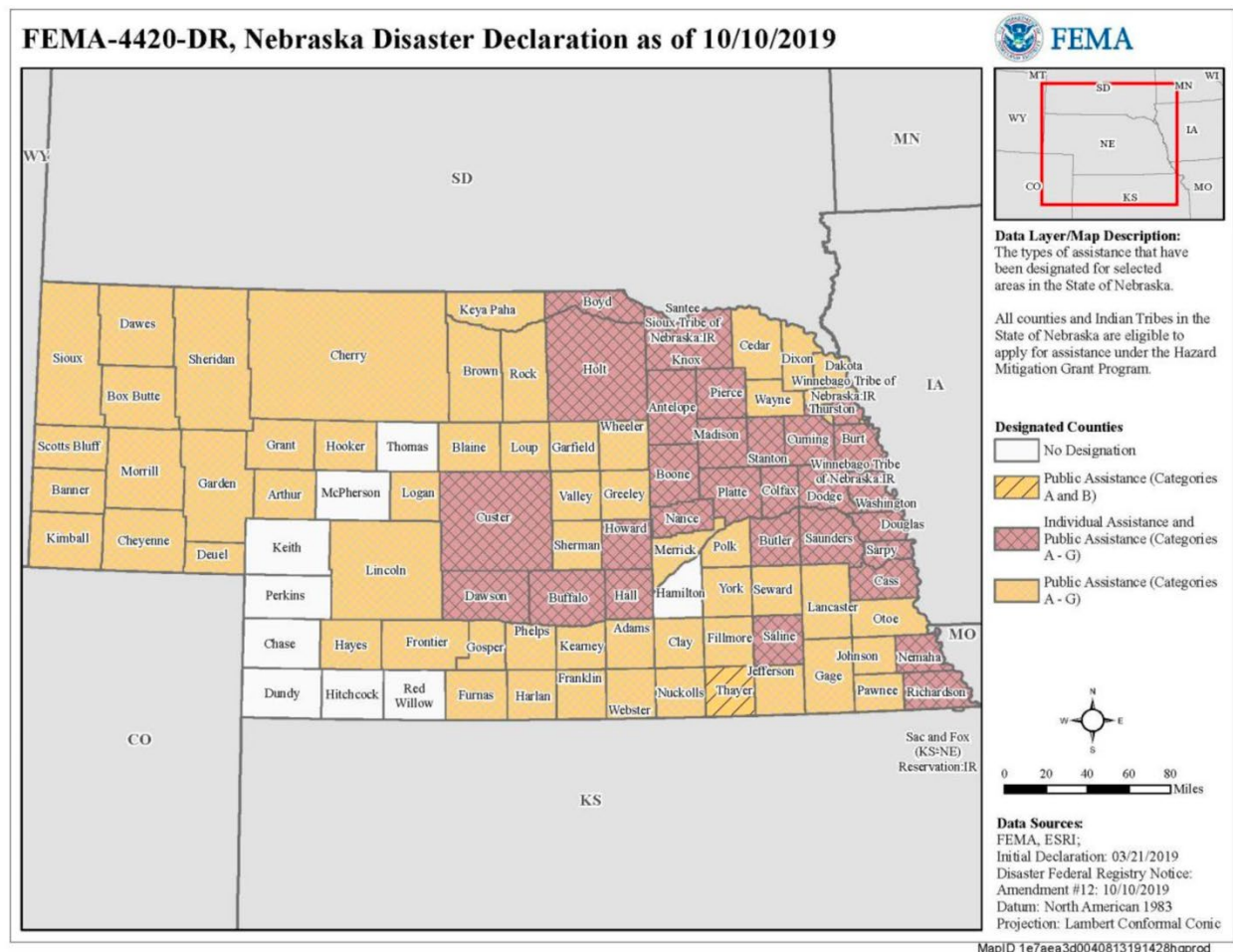
Figure 2-3: Timeline of DR-4420 Disaster Declaration³¹



As shown in Figure 2-4, 84 of Nebraska's 93 counties³² (90%) were ultimately covered by DR-4420, of which 29 counties (and one tribal area) were deemed eligible to receive IA funding.

³¹ Reference to FEMA's Individual Assistance (IA) and Public Assistance (PA) programs. PA Categories A-B refer to emergency work while Categories C-G are permanent work.

³² Does not include tribal areas that received a declaration.

Figure 2-4: Map of Federal Disaster Declaration for Nebraska³³

Disaster declarations allow financial assistance to be made available to support the recovery efforts. The funding made available to designated counties is categorized in the following way (see Table 2-13):

- **FEMA Individual Assistance (IA):** Direct assistance provided to individuals and households through IHP. IHP provides financial assistance and direct services to eligible individuals and households who have uninsured and underinsured necessary expenses and serious needs. IHP is not a substitute for insurance and cannot cover all losses.³⁴
- **FEMA Public Assistance (PA):** Assistance provided to state and territorial governments, local governments, Indian tribal governments and private non-profit organizations. PA is provided through two categories of activities:
 - Emergency Protective Measures for Debris Removal (Category A) and Emergency Protective Measures (Category B); and

³³ FEMA, 2019. Nebraska Severe Winter Storm, Straight-line Winds, and Flooding (DR-4420). Retrieved at: <https://www.fema.gov/disaster/4420>.

³⁴ FEMA, 2019. *Individuals and Households Program*. Retrieved at: https://www.fema.gov/media-library-data/1571949706314-838a916aad698391afe34b45ac13100a/1_FACTSHEET_Individuals_and_Households_Program.pdf.

- Permanent Work for the Restoration of Roads and Bridges (Category C), Water Control Facilities (Category D), Buildings and Equipment (Category E), Utilities (Category F), and Parks, Recreational, and Other Facilities (Category G).³⁵

Table 2-13: FEMA Disaster Declaration, by County³⁶

| County | IA | PA (A-B) | PA (C-G) | County | IA | PA (A-B) | PA (C-G) | County | IA | PA (A-B) | PA (C-G) |
|----------------------|----|----------|----------|-----------|----|----------|----------|---------------------------|----|----------|----------|
| Antelope | ✓ | ✓ | ✓ | Adams | | ✓ | ✓ | Johnson | | ✓ | ✓ |
| Boone | ✓ | ✓ | ✓ | Arthur | | ✓ | ✓ | Kearney | | ✓ | ✓ |
| Boyd | ✓ | ✓ | ✓ | Banner | | ✓ | ✓ | Lancaster | | ✓ | ✓ |
| Buffalo | ✓ | ✓ | ✓ | Blaine | | ✓ | ✓ | Lincoln | | ✓ | ✓ |
| Burt | ✓ | ✓ | ✓ | Box Butte | | ✓ | ✓ | Logan | | ✓ | ✓ |
| Butler | ✓ | ✓ | ✓ | Brown | | ✓ | ✓ | Loup | | ✓ | ✓ |
| Cass | ✓ | ✓ | ✓ | Cedar | | ✓ | ✓ | Merrick | | ✓ | ✓ |
| Colfax | ✓ | ✓ | ✓ | Cherry | | ✓ | ✓ | Morrill | | ✓ | ✓ |
| Cuming | ✓ | ✓ | ✓ | Cheyenne | | ✓ | ✓ | Nuckolls | | ✓ | ✓ |
| Custer | ✓ | ✓ | ✓ | Clay | | ✓ | ✓ | Omaha ³⁷ | | ✓ | ✓ |
| Dawson | ✓ | ✓ | ✓ | Dakota | | ✓ | ✓ | Otoe | | ✓ | ✓ |
| Dodge | ✓ | ✓ | ✓ | Dawes | | ✓ | ✓ | Pawnee | | ✓ | ✓ |
| Douglas | ✓ | ✓ | ✓ | Deuel | | ✓ | ✓ | Phelps | | ✓ | ✓ |
| Hall | ✓ | ✓ | ✓ | Dixon | | ✓ | ✓ | Polk | | ✓ | ✓ |
| Holt | ✓ | ✓ | ✓ | Fillmore | | ✓ | ✓ | Rock | | ✓ | ✓ |
| Howard | ✓ | ✓ | ✓ | Keya Paha | | ✓ | ✓ | Sac and Fox ³⁸ | | ✓ | ✓ |
| Knox | ✓ | ✓ | ✓ | Kimball | | ✓ | ✓ | Scotts Bluff | | ✓ | ✓ |
| Madison | ✓ | ✓ | ✓ | Franklin | | ✓ | ✓ | Seward | | ✓ | ✓ |
| Nance | ✓ | ✓ | ✓ | Frontier | | ✓ | ✓ | Sheridan | | ✓ | ✓ |
| Nemaha | ✓ | ✓ | ✓ | Furnas | | ✓ | ✓ | Sherman | | ✓ | ✓ |
| Pierce | ✓ | ✓ | ✓ | Gage | | ✓ | ✓ | Sioux | | ✓ | ✓ |
| Platte | ✓ | ✓ | ✓ | Garden | | ✓ | ✓ | Valley | | ✓ | ✓ |
| Richardson | ✓ | ✓ | ✓ | Garfield | | ✓ | ✓ | Wayne | | ✓ | ✓ |
| Saline | ✓ | ✓ | ✓ | Gosper | | ✓ | ✓ | Webster | | ✓ | ✓ |
| Santee ³⁹ | ✓ | ✓ | ✓ | Grant | | ✓ | ✓ | Wheeler | | ✓ | ✓ |

³⁵ FEMA, 2018. *Public Assistance Program and Policy Guide*. Retrieved at: https://www.fema.gov/media-library-data/1525468328389-4a038bbef9081cd7dfe7538e7751aa9c/PAPPG_3.1_508_FINAL_5-4-2018.pdf.

³⁶ FEMA, 2019. Nebraska Severe Winter Storm, Straight-line Winds, And Flooding (DR-4420). Retrieved at: <https://www.fema.gov/disaster/4420>.

³⁷ Refers to Omaha Reservation.

³⁸ Refers to Sac and Fox Reservation.

³⁹ Refers to Santee Reservation.

| County | IA | PA (A-B) | PA (C-G) | County | IA | PA (A-B) | PA (C-G) | County | IA | PA (A-B) | PA (C-G) |
|------------|----|----------|----------|-----------|----|----------|----------|-------------------------|----|----------|----------|
| Sarpy | ✓ | ✓ | ✓ | Greeley | | ✓ | ✓ | Winnebago ⁴⁰ | | ✓ | ✓ |
| Saunders | ✓ | ✓ | ✓ | Harlan | | ✓ | ✓ | York | | ✓ | ✓ |
| Stanton | ✓ | ✓ | ✓ | Hayes | | ✓ | ✓ | Thayer | | ✓ | |
| Thurston | ✓ | ✓ | ✓ | Hooker | | ✓ | ✓ | | | | |
| Washington | ✓ | ✓ | ✓ | Jefferson | | ✓ | ✓ | | | | |

2.2.2 AREAS DESIGNATED “MOST IMPACTED AND DISTRESSED”

HUD identified three areas in Nebraska as the MID:

- Sarpy County (entirety);
- Dodge County zip code 68025 (Fremont, Inglewood, and Woodcliff); and
- Douglas County zip code 68064 and 68069 (Valley and Leshara).

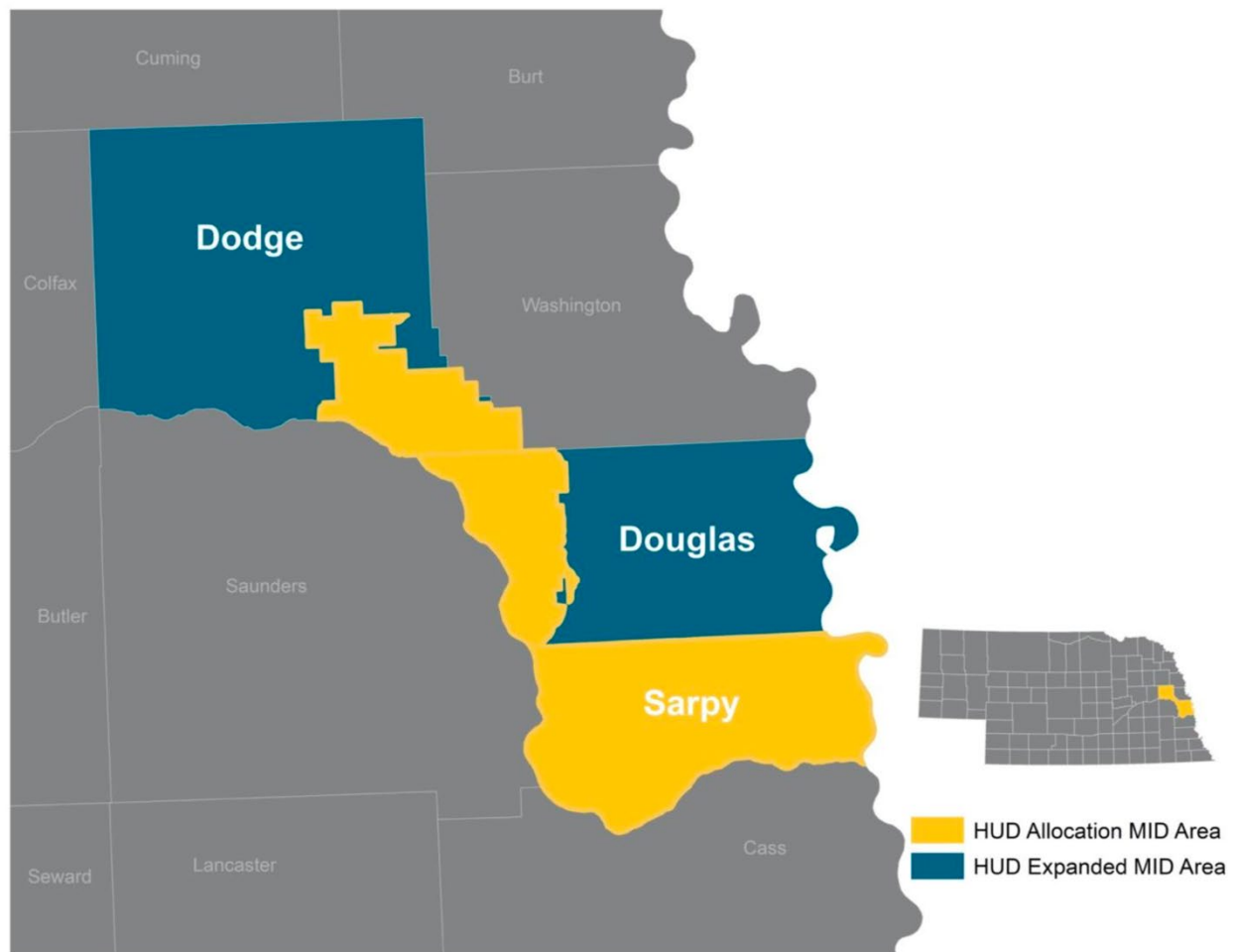
Sarpy County was designated in its entirety as HUD-defined MID, whereas Dodge and Douglas received designation for three zip codes. Based on authorization⁴¹ from HUD, Nebraska will expand the HUD-defined MID areas to cover the entire counties of Dodge and Douglas (Figure 2-5). This step enables the state to direct additional funding to those two counties where a portion (the three zip codes) were identified as being among the most impacted. Per HUD requirements, 80% of CDBG-DR funding is allocated to meet needs in the HUD-defined MID.

To meet the needs of other impacted counties outside of the HUD-defined MID, the State of Nebraska has allocated up to 20% of CDBG-DR funding to support recovery in the State-defined MID. The State-defined MID includes all counties that were included in the federal disaster declaration. The full list of counties included in the HUD-defined MID and the State-defined MID is outlined in Appendix B: Eligible Areas.

⁴⁰ Refers to Winnebago Reservation.

⁴¹ The January 27, 2020 Federal Register Notice, HUD states that if a zip code is identified as a MID designated area, the grantee may indicate in their action plan that it intends to expand the MID to cover the entire county.

Figure 2-5: HUD-Defined Most Impacted and Distressed Areas



2.3 COMMUNITY PROFILE

Understanding the community profile of the impacted areas will help guide the decision-making process to determine where to focus the use of funds. Evaluation of the environmental, housing, infrastructure, and community characteristics assist in determining what types of projects and programs should be prioritized. Measuring specific social vulnerabilities is a key aspect in determining the areas that will have the highest unmet needs, not only in actual disaster recovery losses, but also the ability to recover in a manner that will build resilience in a community and mitigate against future disasters. The ramifications of a disaster can go beyond just the physical damage and can impact the financial well-being of the residents for years following the disaster.

2.3.1 SOCIOECONOMIC STATUS

Table 2-14 shows the socioeconomic demographics of the FEMA designated counties that were eligible for both IA and PA. The table compares the socioeconomic demographics of the HUD and FEMA designated counties. Of Nebraska's total population, 96.6% reside in areas that were damaged by the disaster and were designated as areas eligible to receive FEMA IA or PA.⁴²

Table 2-14: Nebraska Socioeconomic Demographics⁴³

| | HUD MID Designated Counties | State MID IA and PA Declared Counties | PA Only Declared Counties | Total-All Designated Counties ⁴⁴ | State |
|--------------------------------|-----------------------------------|--|---------------------------------|---|-----------|
| Total Population | 770,026 | 406,506 | 687,539 | 1,864,071 | 1,929,268 |
| Percent of Total Population | 39.9% | 21.0% | 35.6% | 96.6% | - |
| Total Households | 296,121 | 160,884 | 383,377 | 840,382 | 852,984 |
| Percent of Total Households | 34.7% | 18.8% | 44.9% | 98.5% | - |
| SOCIOECONOMIC STATUS | | | | | |
| Below Poverty | 9.0% | 11.2% | 12.6% | 12.0% | 12.0% |
| Unemployment Rate | 3.7% | 2.4% | 2.6% | 2.5% | 2.5% |
| Median Household Income | \$64,779 | \$55,299 | \$51,446 | \$53,114 | \$52,963 |
| HOUSEHOLD COMPOSITION | | | | | |
| Minority Group | 4.0% | 3.0% | 3.0% | 2.7% | 2.8% |
| Non-Native English Speakers | 11.7% | 8.5% | 5.0% | 6.4% | 6.3% |

⁴² US Census Bureau. 2015-2018 American Community Survey 5-year Data Profile. Retrieved at: <https://data.census.gov/cedsci/>

⁴³ Ibid.

⁴⁴ Percentages in this column reflect the percent of total state population.

| | HUD MID Designated Counties | State MID IA and PA Declared Counties | PA Only Declared Counties | Total-All Designated Counties ⁴⁴ | State |
|-----------------|-----------------------------------|--|---------------------------------|---|-------|
| Age 65 and Over | 14.7% | 19.6% | 22.8% | 21.6% | 21.7% |
| 17 and Under | 25.8% | 24.7% | 22.2% | 23.1% | 23.0% |
| Age 5 and Under | 7.2% | 6.7% | 5.9% | 6.2% | 6.2% |
| Disability | 7.6% | 7.9% | 8.4% | 8.2% | 8.1% |

Analyzing the age dependent (under 5 and over 65), disabled, minority groups, and poverty levels, demonstrates the need for additional community outreach in the areas where these populations are prevalent.

2.3.2 IMPACT ON LOW- AND MODERATE-INCOME HOUSEHOLDS

A core principle of the CDBG program is the “development of viable urban communities, by providing decent housing, a suitable living environment and expanding economic opportunities, principally for persons of [LMI].”⁴⁵ To meet this core principle, the CDBG authorizing statute requires that no less than 70% of the aggregate of CDBG program funds be expended for activities benefitting LMI persons and this requirement is also applicable to CDBG-DR funds.

For purposes of the CDBG program, low- and moderate-income is defined as total household income at or below 80% of Area Median Income (AMI) as defined by HUD. AMI is calculated yearly at the state level with each county and for certain metropolitan areas having defined income limits. Table 2-15 below shows the most recent AMI for the Extremely Low-Income Limit (ELIL, 30%), Very Low-Income Limit (VLIL, 50%) and Low-Income Limit (LIL, 80%) reported for HUD-defined MID counties, Dodge, Douglas, and Sarpy, though DED will use the most recently published income limits at the time of assistance, which are updated by HUD on an annual basis.

Table 2-15: State of Nebraska Income Limits⁴⁶

| DODGE COUNTY | | | | | | | | |
|-------------------------|--|----------|----------|----------|----------|----------|----------|----------|
| FY 2020 Income Category | Income Limit by # Persons in the Household | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| 30% Limits | \$15,050 | \$17,200 | \$19,350 | \$21,500 | \$23,250 | \$24,950 | \$26,700 | \$28,400 |
| 50% Limits | \$25,100 | \$28,650 | \$32,250 | \$35,800 | \$38,700 | \$41,550 | \$44,400 | \$47,300 |
| 60% Limits | \$30,120 | \$34,380 | \$38,700 | \$42,960 | \$46,440 | \$49,860 | \$53,280 | \$56,760 |
| 80% Limits | \$40,150 | \$45,850 | \$51,600 | \$57,300 | \$61,900 | \$66,500 | \$71,100 | \$75,650 |

⁴⁵ Per 42 USC. 5301(c).

⁴⁶ HUD Exchange, 2020. “2020 Adjusted HOME Income Limits”. Retrieved at: https://www.huduser.gov/portal/datasets/home-datasets/files/HOME_IncomeLmts_State_NE_2020.pdf.

| OMAHA-COUNCIL BLUFFS, NE-IA HUD METRO FMR AREA* | | | | | | | | |
|---|--|----------|----------|----------|----------|----------|----------|----------|
| FY 2020 Income Category | Income Limit by # Persons in the Household | | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| 30% Limits | \$18,300 | \$20,900 | \$23,500 | \$26,100 | \$28,200 | \$30,300 | \$32,400 | \$34,500 |
| 50% Limits | \$30,450 | \$34,800 | \$39,150 | \$43,500 | \$47,000 | \$50,500 | \$53,950 | \$57,450 |
| 60% Limits | \$36,540 | \$41,760 | \$46,980 | \$52,200 | \$56,400 | \$60,600 | \$64,740 | \$68,940 |
| 80% Limits | \$48,750 | \$55,700 | \$62,650 | \$69,600 | \$75,200 | \$80,750 | \$86,350 | \$91,900 |

*HUD uses custom geographic definitions for the Omaha-Council Bluffs, NE-IA HUD Metro FMR Area. It includes the following counties: Harrison County, IA; Mills County, IA; Pottawattamie County, IA; Cass County, NE; Douglas County, NE; Sarpy County, NE; and Washington County, NE.

HUD provides grantees⁴⁷ with LMI data to justify area basis benefit activities that is accessible via HUD's website.⁴⁸ Grantees, such as the State of Nebraska, and their subrecipients must maintain documentation verifying the LMI benefit for each beneficiary of the grant funding. Figure 2-6, Figure 2-7, and Figure 2-8 highlight the percentage of the total population that is LMI by census tract in the HUD-defined MID designated counties. This map provides a visual representation of the geographic distribution of income in the HUD-defined MID. In the counties designated to receive FEMA IA assistance, 40.2% of individuals have an income less than 80% of the AMI (Table 2-15).

2.3.3 MARKET RATE HOUSING

Housing market figures in HUD-defined MID areas are indicative of steady population growth. The 2019 Comprehensive Housing Market Analysis of the Omaha-Council Bluffs Housing Market Area⁴⁹ characterized the sales housing market as being tight, with a vacancy rate of 1.0%; the rental housing market as being balanced at a 6.7% vacancy rate; and the apartment market as being tight, at a 4.0% vacancy rate.⁵⁰ The Dodge County-Wide Housing Study projects a tight housing market in Dodge County due to a likely increase in population by 4.8 percent by 2022.⁵¹

⁴⁷ Low- and moderate-income benefit can be demonstrated in four ways: area basis, limited clientele, housing, and creation/retention of jobs. The "area basis" approach is based on HUD-supplied income data from the US Census, while the "limited clientele" approach makes an assumption based on income characteristics of a specific group being assisted. Demonstrating low- and moderate-income benefit through housing and jobs is focused on the income of the individual or household receiving the direct benefit of the activity.

⁴⁸ HUD Exchange, n.d. *CDBG Low- and Moderate-Income Data*. Retrieved at: <https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data/>.

⁴⁹ The Omaha-Council Bluffs Housing Market Area includes MID areas Douglas and Sarpy Counties, as well as Saunders, and Washington Counties in Nebraska. The Housing Market Area includes parts of Iowa as well, including Harrison, Mills, and Pottawattamie Counties.

⁵⁰ HUD Office of Policy Development and Research, 2019. *Comprehensive Housing Market Analysis: Omaha-Council Bluffs, Nebraska-Iowa*. Retrieved at <https://www.huduser.gov/portal/publications/pdf/OmahaNE-CouncilBluffsIA-CHMA-19.pdf>.

⁵¹ Nebraska Investment Finance Authority – Housing Study Grant Program, 2017. Dodge County & Communities, Nebraska: County-Wide Housing Strategy for Affordable Housing- 2022. Retrieved at <https://www.fremontne.gov/DocumentCenter/View/4738/DODGE-COUNTY--COMMUNITIES-NEBRASKA-COUNTY-WIDE-HOUSING-STUDY-WITH-STRATEGIES-FOR-AFFORDABLE-HOUSING-2022?bidId=>.

The 2019 floods did not have an observable impact on these vacancy rates in the HUD-defined MID area.

2.3.4 REVIEW OF PUBLIC SERVICE NEEDS

Impacted areas were predominantly rural with low population densities and as a result, there was limited need after the disaster for public services to address post-disaster needs. Existing resources filled potential needs in the 12 months after the disaster event and the COVID-19 pandemic make isolating any remaining needs nearly impossible. Long-term recovery groups across the impacted area report ongoing disaster case management including 12 full-time case managers and 3 part-time case managers. Of these, 6 case managers are dedicated resources for HUD-defined MID areas. The long-term recovery groups report that the majority of these efforts are focused on housing rehabilitation and reconstruction, with related needs as reported in Table 2-7.

For vulnerable populations that require additional services and special accommodations to ensure they can apply for and receive disaster recovery aid, the Homeowner Assistance Program allows for housing counseling as an eligible activity. No additional public services are anticipated more than 18 months post-event.

Figure 2-6: Percentage LMI Populations in Douglas County

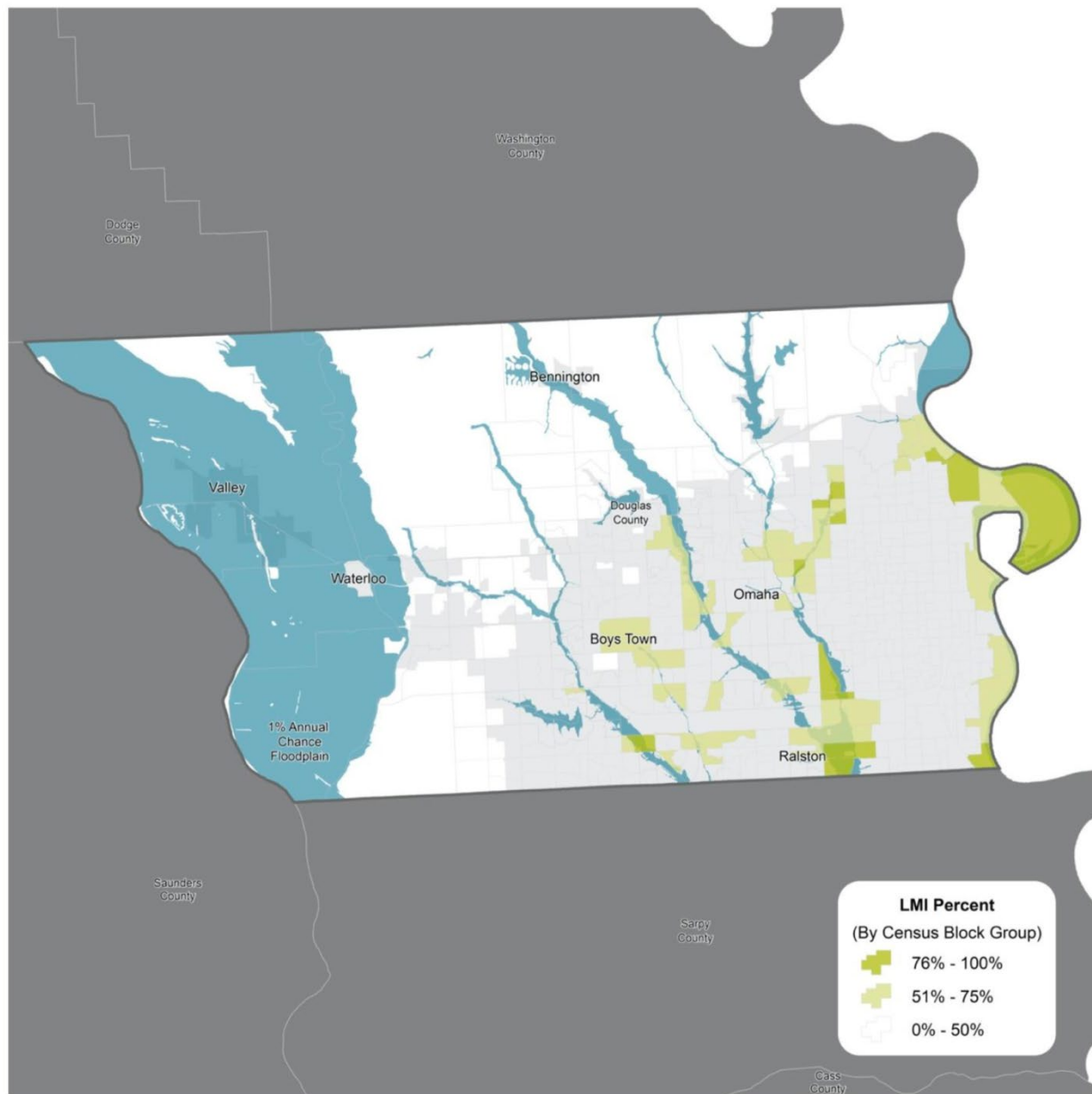


Figure 2-7: Percentage LMI Populations in Dodge County

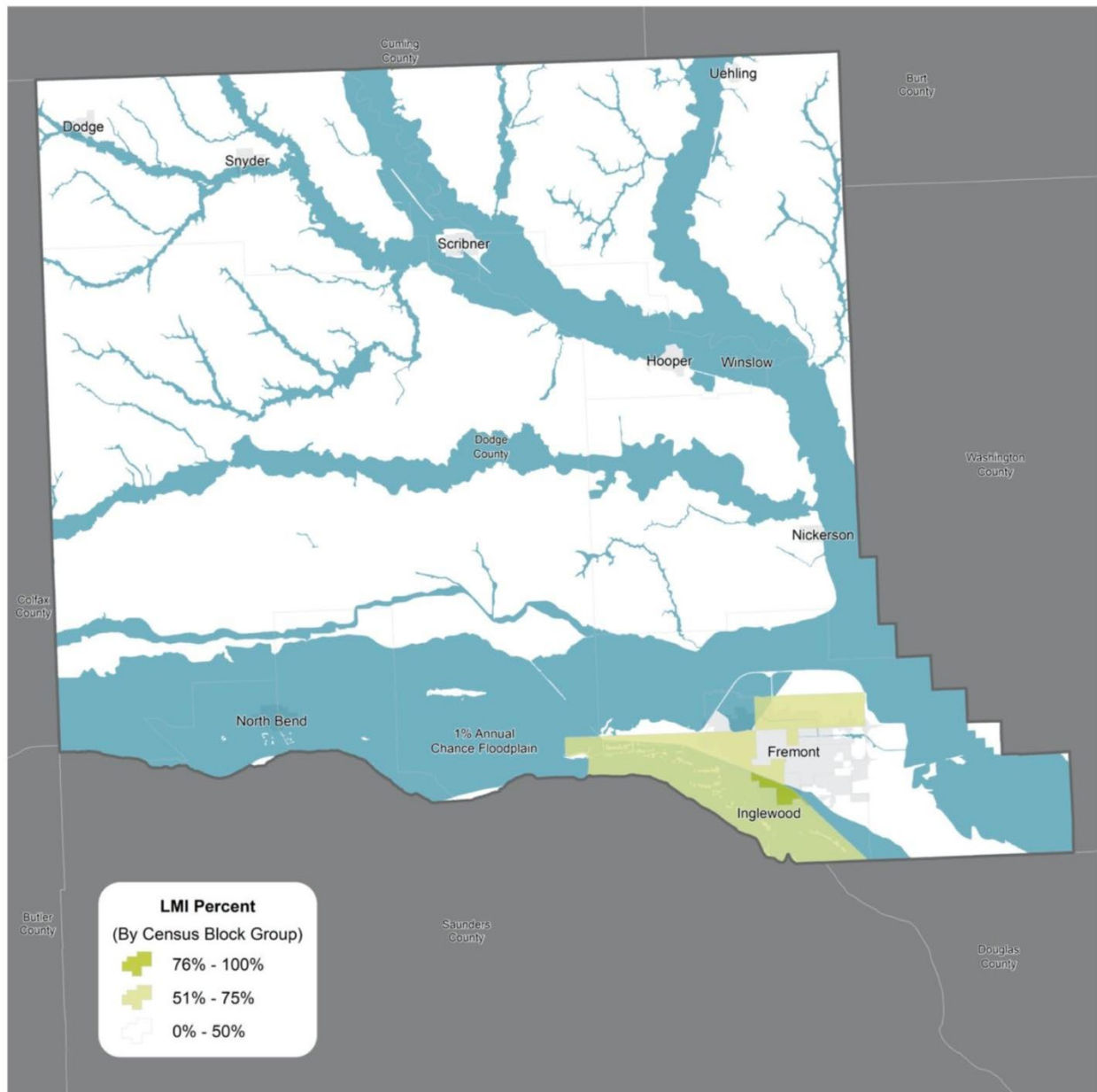
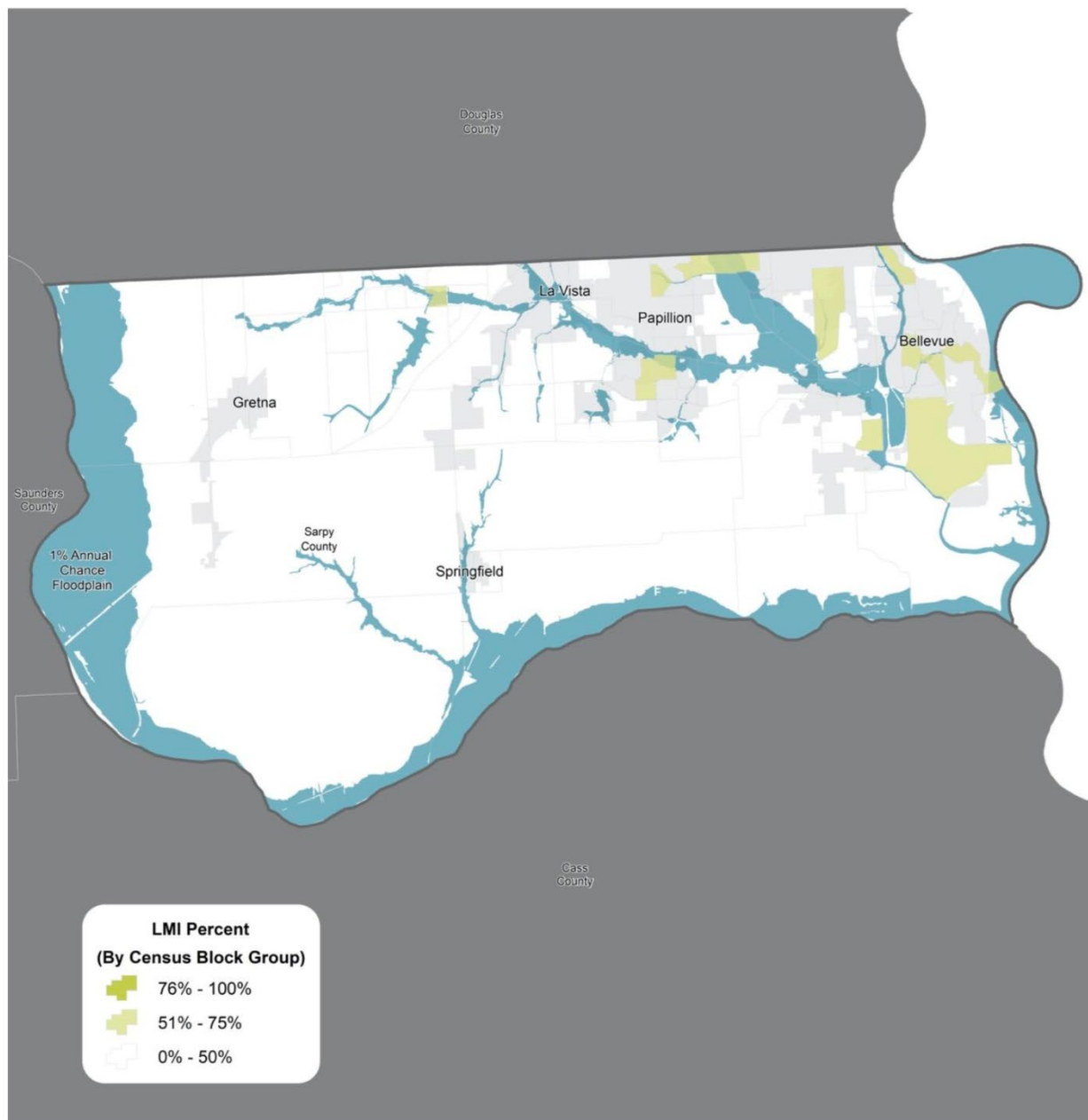


Figure 2-8: Percentage LMI Populations in Sarpy County



2.4 OVERVIEW OF IMPACTS TO CORE SECTORS

Three core sectors define disaster recovery: infrastructure, housing, and economic revitalization. To understand the need, each sector is summarized, including defining aspects and pivotal areas to be addressed for a successful recovery effort. The sectors are each allotted a certain percentage of funding that may be spent on projects in their respective sector. HUD may grant a waiver to shift funding allocations to other sectors depending on the needs in each community. If a community can demonstrate that their housing needs have been addressed, the grantee may request that the allocation be shifted to allow for additional infrastructure or economic recovery funding.

2.4.1 IMPACT ON INFRASTRUCTURE

Winter Storm Ulmer and the subsequent flooding caused severe damage to the State of Nebraska's infrastructure facilities, creating cascading impacts across many sectors. Infrastructure damage was widespread, with 84 out of 93 counties impacted, reporting damage to roads, bridges, levees, dams, and many other critical infrastructure facilities.⁵²

The estimated cost to repair infrastructure facilities is currently valued at more than \$640 million,⁵³ but the number is thought to be significantly higher, as data on flood control works is not currently available. FEMA defines flood control works as structures, such as levees, flood walls, flood control channels, and water control, that are designed and constructed to have an appreciable effect in preventing damage due to an irregular and unusual rise in water levels.⁵⁴ State and local governments moved quickly after the disasters to repair roads and other public infrastructure; however, rebuilding and mitigating for future events is an ongoing effort. Infrastructure remains a critical component in unmet needs and, due to a lack of centralized data and data that may not exist, the full extent of the damage to these systems is still unknown.

In addition, several fire stations were damaged during Winter Storm Ulmer, most notably the Fremont Rural Fire Station and the North Bend Fire District. North Bend reported

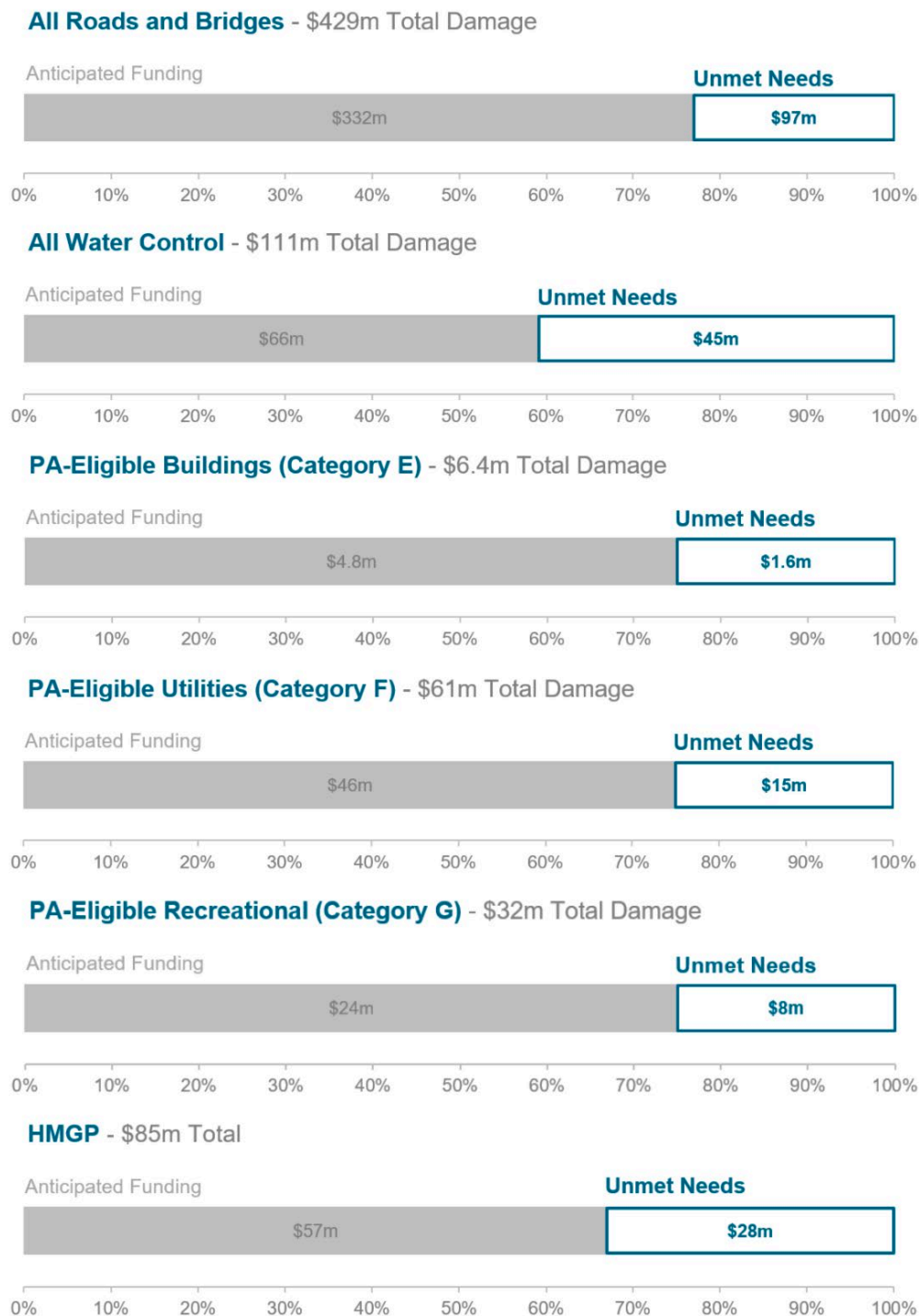
Figure 2-9: Flooded Railway Bridge



⁵² FEMA, 2019. Nebraska Severe Winter Storm, Straight-line Winds, And Flooding (DR-4420). Retrieved at: <https://www.fema.gov/disaster/4420>.

⁵³ \$640 million is the sum of estimated damage presented in Table 2-7.

⁵⁴ FEMA Fact Sheet: Public Assistance. Retrieved at: https://www.fema.gov/media-library-data/1579196182575-ca576e176a344d81c01557191d2337ac/PA_Fact_Sheet_Flood_Control_Works_2017_508.pdf.

Figure 2-11: Infrastructure Costs by Category⁵⁶

⁵⁶ This figure represents current repair estimates, which are subject to change. Additionally, (1) roads and bridges unmet needs include funding from FEMA and the Federal Highway Administration; and (2) water control unmet needs include funding from FEMA, Natural Resources Conservation Service, and US Army Corps of Engineers. See section 2.4.1.1 and section 2.4.1.2.

2.4.1.1 ROADS AND BRIDGES

The 2019 disasters devastated roads and bridges throughout the State of Nebraska. Currently, the estimated value of damage to roads and bridges is \$429 million (Table 2-16). Local, state, and federal roads and bridges were all impacted with closures of 3,300 state highway miles and 27 state highway bridges, approximately one-third of the state highway miles in Nebraska.⁵⁷ Local governments reported damage to streets and culverts remain in varying states of repair. In the aftermath of the disaster, the Nebraska Department of Transportation and local governments moved quickly to provide emergency and temporary repairs to enable roads to reopen. However, over a year after the flooding began, work still remains to fully restore roads throughout the state.

Table 2-16: Damage to Roads and Bridges⁵⁸

| Funding Source | Damage | Anticipated Funding | Unmet Needs |
|--------------------------------|----------------------|----------------------|---------------------|
| Federal-Aid Roads | \$201,000,000 | \$160,800,000 | \$40,200,000 |
| PA-Eligible Roads (Category C) | \$227,824,784 | \$170,868,588 | \$56,956,196 |
| All Roads and Bridges | \$428,824,784 | \$331,668,588 | \$97,156,196 |

Due to closures on many of the roadways, other local roads that were not rated for heavy-use were more heavily used, causing additional wear and tear. These indirect impacts on local roads and privately-owned roads made recovery efforts even more difficult. The local roads are used for personal travel for Nebraska's individuals and families and for the transportation of agricultural equipment, livestock, feed, and milk trucks, making these roads critical to the state economy. These indirect impacts may not be covered by federal disaster recovery assistance, with responsibility potentially falling on the local and state governments.

⁵⁷ Nebraska Department of Transportation, 2019. "About Us." Retrieved at: <https://dot.nebraska.gov/about/>.

⁵⁸ This table represents current repair estimates, which are subject to change.

Figure 2-12: Washed-Out Road Under Repair

2.4.1.2 WATER CONTROL AND WASTEWATER TREATMENT FACILITIES

Water control facilities are those built for channel alignment, recreation, navigation, land reclamation, maintenance of fish and wildlife habitat, interior drainage, irrigation, and erosion prevention.⁵⁹ Damage to the State of Nebraska's water control facilities was extensive, currently estimated at \$111 million (Table 2-17). Dams, levees, and other drainage facilities were breached, overtopped, or otherwise compromised. The full extent of damage to water control facilities is not yet known due to a lack of information and data from privately owned facilities.

Table 2-17: Damage to Water Control and Treatment Facilities⁶⁰

| Funding Source | Damage | Anticipated Funding | Unmet Need |
|---|----------------------|---------------------|---------------------|
| PA-Eligible Levees (Category D) | \$38,147,327 | \$28,610,495 | \$9,536,832 |
| Natural Resources Conservation Service (NRCS) Emergency Watershed Protection Program (EWPP) | \$40,000,000 | \$4,100,000 | \$35,900,000 |
| United States Army Corps of Engineers (USACE) Rehabilitation and Inspection Program (RIP) | \$32,963,283 | \$32,963,283 | N/A |
| All Water Control | \$111,110,610 | \$65,673,778 | \$45,436,832 |

⁵⁹ Public Assistance Handbook, FEMA. Retrieved at: https://www.fema.gov/pdf/government/grant/pa/fema323_app_handbk.pdf.

⁶⁰ This table represents current repair estimates, which are subject to change.

The largest impact of Winter Storm Ulmer on dams in Nebraska was the failure and collapse of the Spencer Dam. The Spencer Dam, which failed on March 14, 2019, is a hydroelectric dam⁶¹ located on the Niobrara River and owned by the Nebraska Public Power District. Large chunks of ice (measuring 18 to 24 inches thick) carried by flood waters contributed to the dam failure—the first time such a cause has been cited.⁶² The dam failure immediately destroyed a saloon, a cattle herd, a portion of US Highway 281, and is thought to have caused at least one death.⁶³ This failure demonstrates the need for additional mitigation and resilience measures to be taken when completing recovery repairs on infrastructure.

Dodge County relies on a network of flood control infrastructure that includes 85 miles of drainage ditches, 32.71 miles of public levees, and private levees/berms. Private levees/berms, unable to qualify for public dollars (e.g., FEMA or USACE), have been left unrepaired or have been addressed through ad hoc repairs. Dodge County has identified \$584,000 to repair privately owned dikes throughout the county, which at the time of this report, do not have a funding source to assist with the expense. The City of North Bend has identified \$600,000 to repair the dike on the north side of the Platte River that sustained substantial damage and 605 water meters were reportedly destroyed. Privately-owned stormwater infrastructure was impacted in addition to the public infrastructure, but the damage and repairs costs are only available anecdotally.

2.4.1.3 UTILITY SYSTEMS

Winter Storm Ulmer resulted in significant disruptions to electrical services throughout the impacted areas. Power, water, and sewer services throughout the State of Nebraska reported damage and the current total estimated cost for utility repair projects is \$61 million (Table 2-18), based on FEMA PA data.⁶⁴ The flood waters caused damage to individual electrical meters and hydroelectric dams, ranging from limited to extensive damage. Due to the nature of the storm and its lingering effects, the continued flooding made it difficult to determine the exact extent of the damage to these facilities. Furthermore, road and bridge closures also hindered the state's ability to make expedient repairs.

Table 2-18: Damage to Utility Systems⁶⁵

| Funding Source | Damage | Anticipated Funding | Unmet Need |
|------------------------------------|--------------|---------------------|--------------|
| PA-Eligible Utilities (Category F) | \$61,348,430 | \$46,011,322 | \$15,337,108 |

The Omaha Public Power District (OPPD) lost two substations and two transmission lines. These facilities provide electricity to a portion of Bellevue, and South Omaha. The two substations and

⁶¹ Structure placed across a flowing river that converts the kinetic energy of the water into electricity by spinning turbines.

⁶² Hammel, 2019. *Spencer Dam collapse may be first in nation caused by giant ice chunks, inspector says*. Omaha World Herald. Retrieved at: https://www.omaha.com/news/state_and_regional/spencer-dam-collapse-may-be-first-in-nation-caused-by/article_e0af7571-9264-5691-bd5c-344f4e940e85.html.

⁶³ Salter, 2019. *11-foot wall of water: One dam breaks, three counties suffer*. Lincoln Journal Star. Retrieved at: https://journalstar.com/news/state-and-regional/nebraska/foot-wall-of-water-one-dam-breaks-three-counties-suffer/article_eaf487d7-acc0-53a8-8786-9eccb43942ed.html.

⁶⁴ Data obtained from NEMA and current as of January 17, 2020.

⁶⁵ This table represents current repair estimates, which are subject to change.

transmission lines were fully operational prior to the flood but were inundated with water and destroyed. The two transmission lines were in standing water and had to be removed from service for public safety. The cost to rebuild the substations is approximately \$4 million. OPPD has expressed the need to replace the service provided by the substations and transmission lines. However, due to the locations being in a floodplain, rebuilding outside of their current location will be required for mitigation purposes. This need to rebuild outside the floodplain has resulted in a higher estimated cost to rebuild such that the proposed Bellevue Redesign is approximately \$25 million.

Immediately after the disaster, publicly owned water treatment systems and privately-owned wells were at risk of becoming contaminated due to the floodwaters. The Nebraska Department of Health and Human Services determined the disasters impacted 51 public water systems (3.8%) in the state, and 22 of these water systems were forced offline. Portions of Boyd County had no running drinking water for six months after the Spencer Dam collapsed and destroyed the Rural Water District pipeline.⁶⁶ Damage to privately owned wells remains largely unknown because the state does not monitor these; however, as a result of this missing data, there was a marked concern with contaminated drinking water. The damage to these wells may not be known for some time.

Wastewater treatment services are publicly owned and treat both domestic and industrial sewage. The State of Nebraska reported that 81 wastewater treatment facilities were damaged from the 2019 disasters.⁶⁷

2.4.1.4 PARKS, RECREATIONAL, AND OTHER FACILITIES

In total, 33 counties applied for FEMA PA to fund the restoration of municipal parks, sports facilities, trail facilities, natural resource protection, and marina facilities. The Village of Inglewood has identified, among many items, the need for parks-related repairs estimated at \$50,000 for leveling, reseeding, and shelter stabilization. This may not account for all the damage incurred to these facilities as only about one-third of the PA-eligible counties reported damage in this category. Moreover, it is possible that the impacts caused damage to recreational facilities that are ineligible for FEMA assistance. In Sarpy County, the Fontanelle Forest Flood Recovery Project has identified damaged or washed away boardwalks, docks, and bridges that once provided access to wetland areas in the Great Marsh. The estimated cost to repair is at \$318,450 with FEMA covering \$175,000 and a local foundation providing \$30,000.

Table 2-19 summarizes unmet needs specific to parks, recreational, and other facilities.

⁶⁶ NET News, 2019. "Boyd County Drinking Water Restored After Six Months." Retrieved at: <http://netnebraska.org/article/news/1191729/boyd-county-drinking-water-restored-after-six-months>

⁶⁷ Nebraska Department of Environment and Energy, 2020. "Storm Recovery and Flooding in Nebraska: Environmental Guidance." Retrieved at: <http://deq.ne.gov/NDEQProg.nsf/OnWeb/Disaster>

Table 2-19: Damage to Parks, Recreational, and Other Facilities⁶⁸

| Funding Source | Damage | Anticipated Funding | Unmet Need |
|--|---------------------|---------------------|--------------------|
| PA-Eligible Buildings (Category E) | \$6,451,172 | \$4,838,378 | \$1,612,794 |
| PA-Eligible Recreational (Category G) | \$32,328,977 | \$24,246,733 | \$8,082,244 |
| All Buildings and Recreational Facilities | \$38,780,149 | \$29,085,111 | \$9,695,038 |

2.4.1.5 INFRASTRUCTURE DAMAGE IN THE MOST IMPACTED AND DISTRESSED AREAS

The county and three zip codes that HUD designated as MID (Sarpy County, Dodge – 68025, and Douglas – 68069, 68064) experienced a disproportionate amount of damage from the 2019 disasters. This is clearly demonstrated in the FEMA PA data from the disaster, as HUD-defined MID counties account for 23% of total PA costs despite only representing three percent of all counties eligible for PA funding. Accordingly, it is helpful to compare the cost of infrastructure damage per capita within and outside of the HUD-defined MID across FEMA PA categories of work (Table 2-20).

Table 2-20: PA Cost per Capita in MID Counties^{69, 70}

| | Dodge | Douglas | Sarpy | State MID Counties |
|--|-----------------|----------------|-----------------|--------------------|
| Population | 36,683 | 554,992 | 178,351 | 1,094,045 |
| Cat. A – Debris Removal | \$59.40 | \$13.77 | \$20.03 | \$8.95 |
| Cat. B – Emergency Measures | \$112.95 | \$13.75 | \$3.53 | \$17.61 |
| Cat. C – Roads and Bridges | \$528.43 | \$9.87 | \$10.42 | \$158.08 |
| Cat. D – Water Control Facilities | \$27.39 | \$3.16 | \$2.64 | \$29.86 |
| Cat. E – Buildings and Equipment | \$14.93 | \$2.65 | \$31.62 | \$5.18 |
| Cat. F – Utilities | \$27.98 | \$28.16 | \$8.45 | \$49.91 |
| Cat. G – Parks, Rec. Facilities, and Other Items | \$25.87 | \$13.79 | \$24.50 | \$17.14 |
| Total | \$796.96 | \$85.15 | \$101.19 | \$286.73 |

2.4.1.6 PROMOTING RESILIENCE

CDBG-DR funding will be integral to rebuilding structures to meet code and be resilient in the face of future disasters. HMGP plays a critical role in long-term resilience improvements for infrastructure in the impacted areas, as these funds can be used for mitigation and planning activities. HMGP is generally allocated based on 15% of the total PA funds provided by FEMA, in addition to the FEMA IA funds made available. Despite the size of the total award, jurisdictions

⁶⁸ This table represents current repair estimates, which are subject to change.

⁶⁹ FEMA database last updated 03/16/2020

⁷⁰ US Census Bureau. 2015-2018 American Community Survey 5-year Data Profile. Retrieved at: <https://data.census.gov/cedsci/>

that receive HMGP awards are expected to contribute a portion of funding to the eligible project or activity, likely yielding unmet needs for resilience improvements.

CDBG-DR funds may be used as a non-federal share match in specific instances where a particular project can meet CDBG-DR requirements. These funds can also be used to address mitigation measures for housing and infrastructure where it is not reasonable to build back to pre-disaster status due to the damage of the structures. The Infrastructure Match Program will support projects that promote resilience by assisting jurisdictions in meeting the HMGP match requirement. Integral to the CDBG-DR program is rebuilding structures to meet code and be resilient in the face of another disaster.

Table 2-21: Infrastructure Resilience Unmet Needs

| Funding Source | Damage | Anticipated Funding | Unmet Need |
|----------------|--------------|---------------------|--------------|
| HMGP | \$84,775,971 | \$56,872,028 | \$27,903,943 |

2.4.2 IMPACT ON HOUSING

Evaluating the FEMA applications for housing assistance will demonstrate the impact on housing throughout the State of Nebraska, highlighting the housing unmet needs resulting from the 2019 disasters. While the HUD-defined MID areas demonstrate the areas with the highest unmet needs, these areas may not represent the LMI areas of highest unmet needs. HUD's unmet needs calculation does not consider the LMI population, which may inadvertently misrepresent the highest need areas in terms of vulnerable populations and the directive to address LMI persons with CDBG-DR funds.

Following the disaster declaration, individuals applied for assistance through FEMA and SBA for home repairs, rental assistance, and other needs assistance. Figure 2-13 shows the total FEMA renter applications and Figure 2-14 shows FEMA owner-occupied applications submitted in all counties eligible for FEMA IA assistance, total approved applications, and percentage of approved applications. The total number of applicants in the HUD-defined MID areas (Sarpy, Dodge, and Douglas) represent 46.6% of the total applications submitted to FEMA and 57.4% of all approvals for individual assistance. Looking at the MID designated areas, including the entire county of Dodge and Douglas, these areas have a substantially higher rate of applications submitted and applications approved for both owner-occupied and renter-occupied applications.

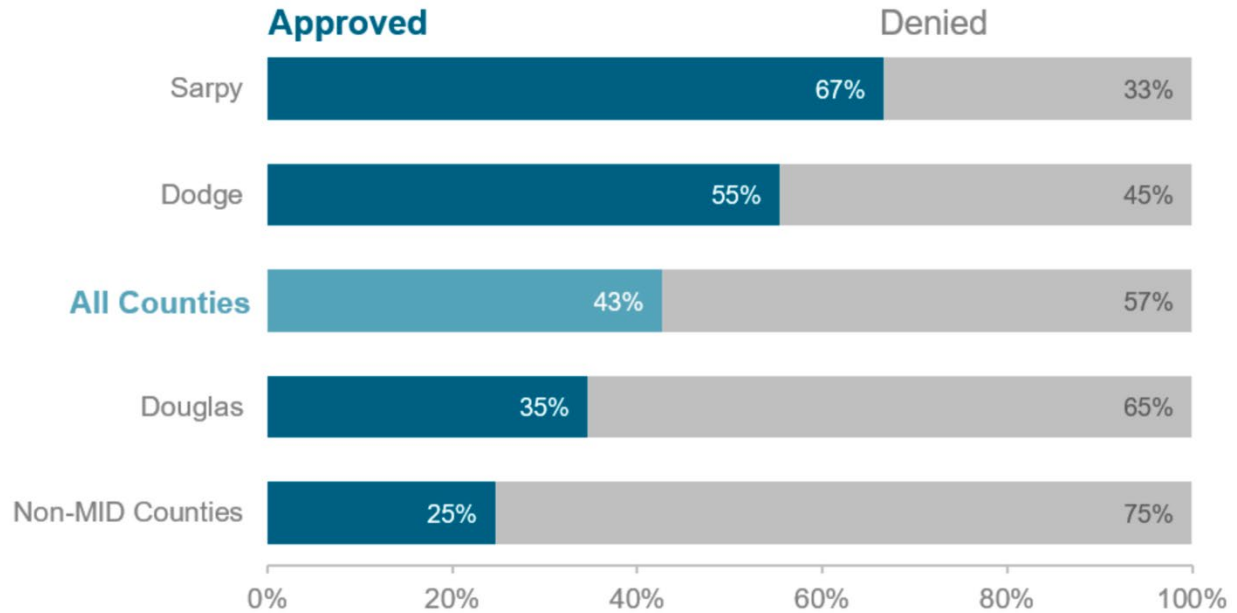
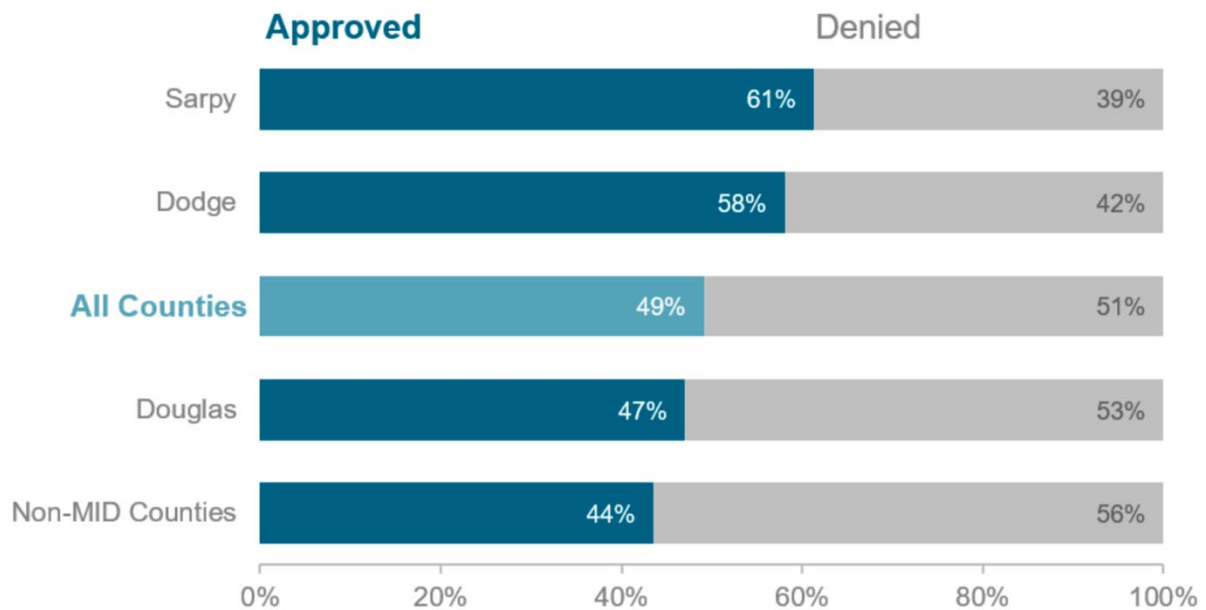
Figure 2-13: FEMA Individual Assistance Renter Applications⁷¹**Figure 2-14: FEMA Individual Assistance Owner-Occupied Applications⁷²**⁷¹ FEMA Individual Assistance Database. Last updated: 03/16/2020.⁷² Ibid.

Figure 2-15: Total Individual Assistance Claims by Census Block Group for Douglas County

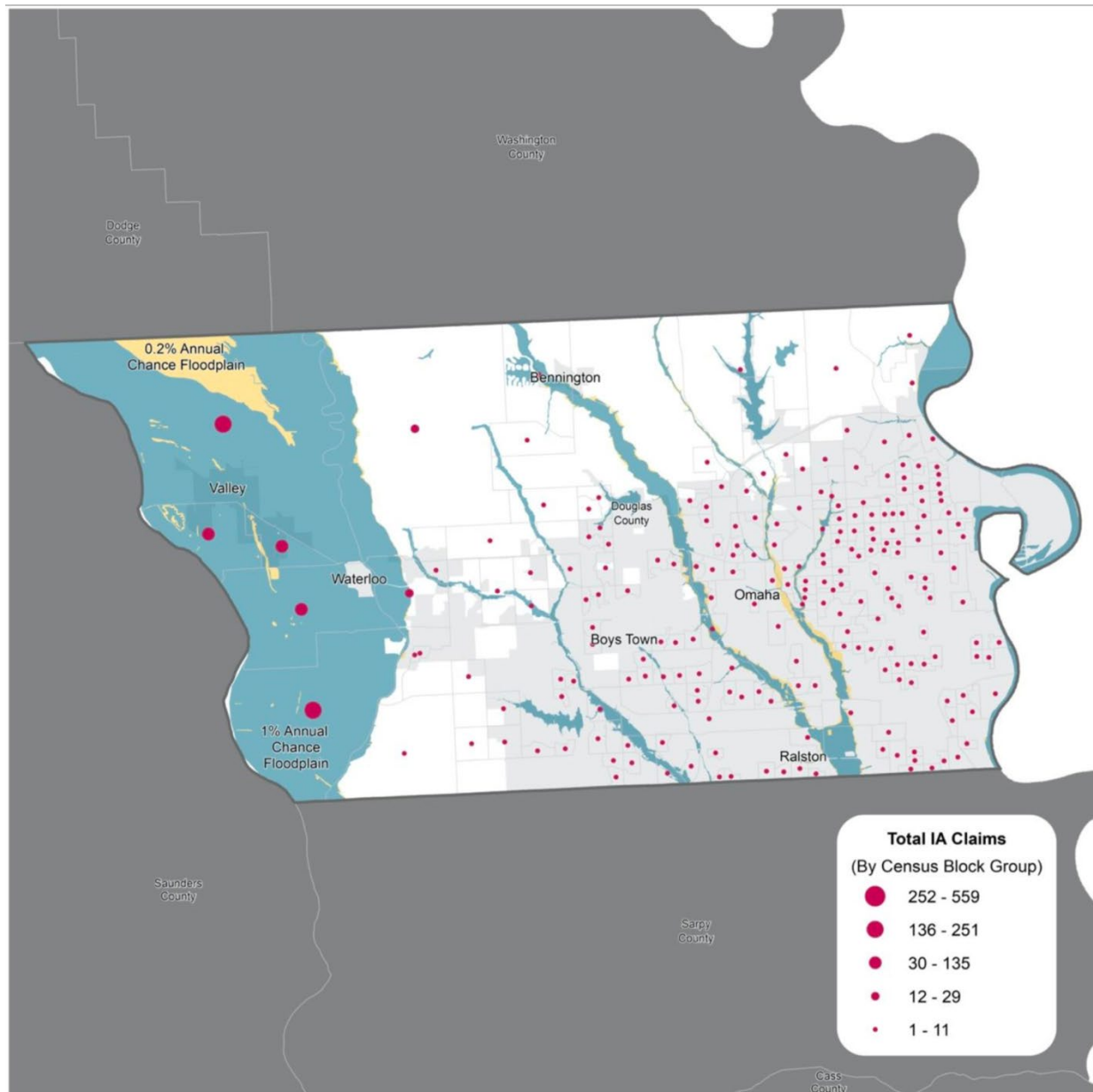


Figure 2-16: Total Individual Assistance Claims by Census Block Group for Dodge County

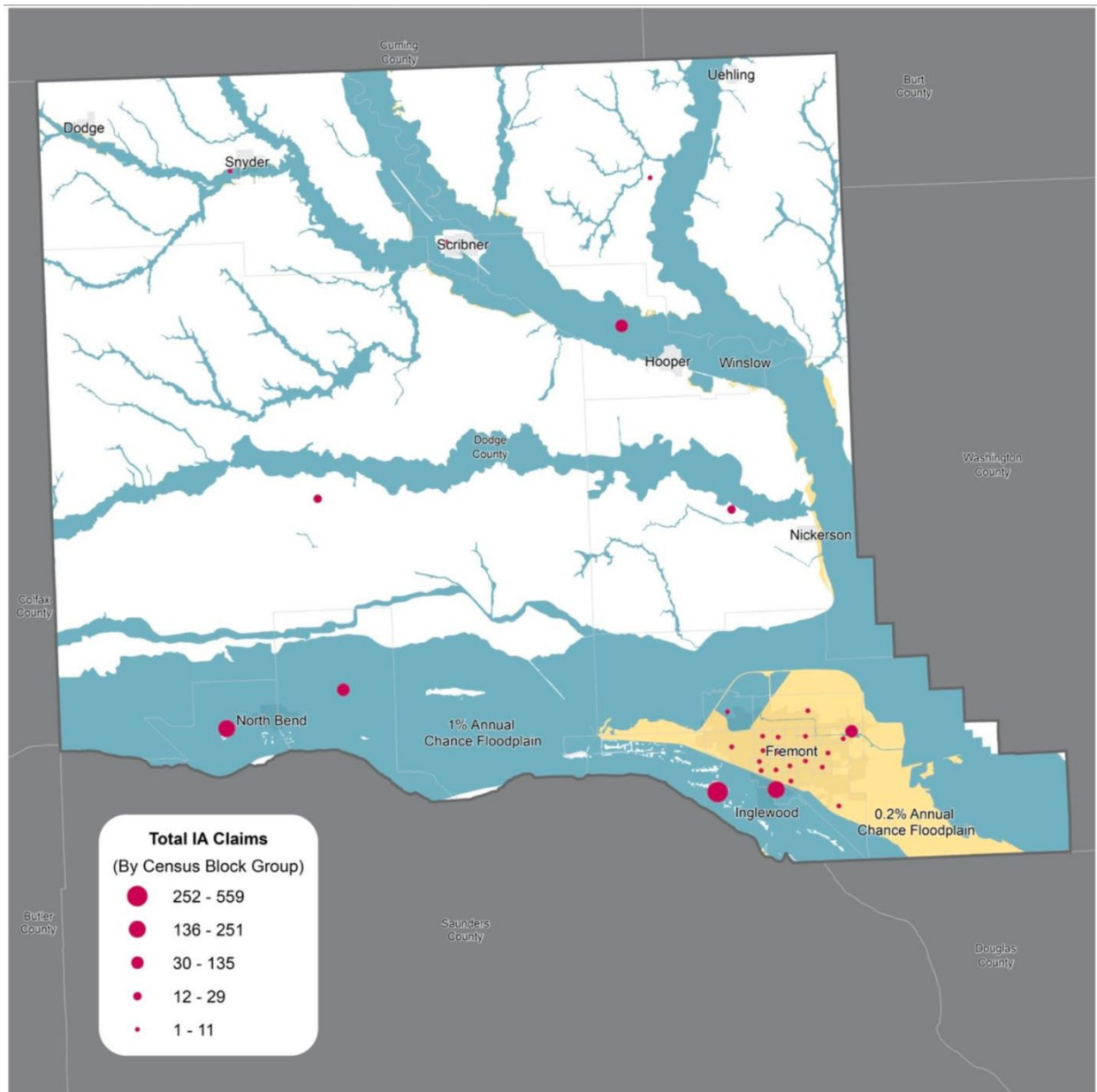
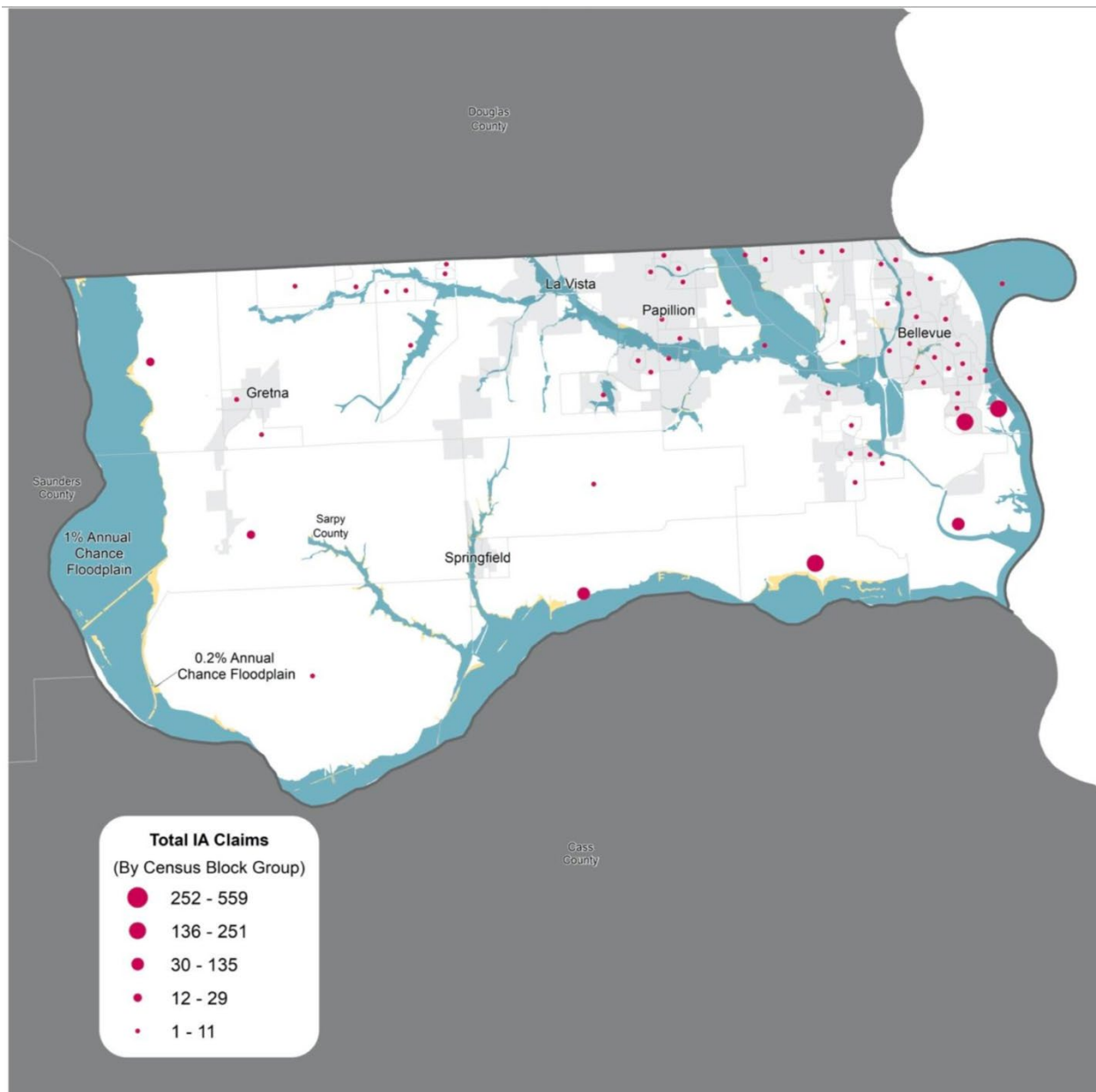


Figure 2-17: Total Individual Assistance Claims by Census Block Group for Sarpy County



2.4.2.1.1 Owner-Occupied and Renter-Occupied Housing

The 2019 disasters impacted owners and renters throughout the State of Nebraska. While HUD identified Dodge, Douglas, and Sarpy as the MID areas, the impacts were felt statewide. Table 2-22 details FEMA IA applications submitted by owners and renters, housing units inspected, and the demographics of those applications in each county. According to the US Census Bureau, as of 2018, Nebraska has an average poverty level of 11%, and is home to vulnerable populations including aging individuals (19%) and people with disabilities (7.9%). Additionally, 40.2% of the impacted communities earn income at or below 80% of the AMI.⁷³

Table 2-22: FEMA Owner-Occupied and Rental Unit Application Data⁷⁴

| County | Total Owner Applications | Total Rental Applications | Inspections Completed | Less than 80% AMI | Poverty | Disabled | English as Second Language | Age Dependent (Less than 5, Over 65) | Minority Group | Unemployment |
|----------|--------------------------|---------------------------|-----------------------|-------------------|---------|----------|----------------------------|--------------------------------------|----------------|--------------|
| Antelope | 33 | 2 | 20 | 44.6% | 12.6% | 8.3% | 3.3% | 23.6% | 0.9% | 1.3% |
| Boone | 66 | 11 | 54 | 37.3% | 9.2% | 6.4% | 1.8% | 22.8% | 0.9% | 1.2% |
| Boyd | 196 | 34 | 100 | 45.1% | 13.9% | 9.3% | 2.1% | 30.6% | 0.9% | 0.9% |
| Buffalo | 325 | 75 | 305 | 40.4% | 10.7% | 7.8% | 7.8% | 14.5% | 2.4% | 2.2% |
| Burt | 24 | 2 | 14 | 39.4% | 10.8% | 10.4% | 2.5% | 24.1% | 1.4% | 1.8% |
| Butler | 78 | 7 | 48 | 37.9% | 9.1% | 8.3% | 5.7% | 20.9% | 1.2% | 2.1% |
| Cass | 211 | 38 | 171 | 33.1% | 7.4% | 6.5% | 2.2% | 17.5% | 1.2% | 3.0% |
| Colfax | 91 | 15 | 76 | 44.3% | 10.4% | 5.8% | 44.3% | 13.5% | 9.7% | 2.2% |
| Cuming | 70 | 5 | 35 | 41.8% | 8.9% | 5.1% | 8.0% | 22.0% | 2.3% | 2.5% |
| Custer | 183 | 15 | 143 | 42.2% | 12.0% | 8.0% | 3.8% | 22.4% | 1.2% | 1.9% |
| Dawson | 328 | 39 | 308 | 45.6% | 12.1% | 8.3% | 30.2% | 16.6% | 7.5% | 2.6% |
| Dodge | 1,001 | 323 | 1,020 | 40.2% | 9.8% | 8.8% | 11.5% | 19.2% | 3.2% | 4.6% |
| Douglas | 814 | 274 | 861 | 43.6% | 11.6% | 7.5% | 14.9% | 13.0% | 5.4% | 4.2% |
| Hall | 185 | 21 | 166 | 42.7% | 13.0% | 8.8% | 22.0% | 14.9% | 6.3% | 3.2% |
| Holt | 59 | 5 | 37 | 41.8% | 12.1% | 8.0% | 4.6% | 21.6% | 1.3% | 0.8% |
| Howard | 113 | 10 | 74 | 36.7% | 10.2% | 7.3% | 2.3% | 21.1% | 0.9% | 2.2% |
| Knox | 156 | 26 | 126 | 42.5% | 13.4% | 7.5% | 5.2% | 24.7% | 2.7% | 2.1% |
| Madison | 131 | 28 | 127 | 41.7% | 11.7% | 7.6% | 13.5% | 15.9% | 3.9% | 2.1% |
| Nance | 37 | 4 | 22 | 45.4% | 11.7% | 10.5% | 1.6% | 21.4% | 1.1% | 2.1% |

⁷³ These populations, among others, will likely require targeted outreach. The Citizen Participation Plan in section 8 of the Action Plan addresses the outreach requirements as outlined in the federal register for this allocation.

⁷⁴ Application and inspection data obtained from FEMA database last updated 03/16/2020. American Community Survey data obtained from <https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/>.

| County | Total Owner Applications | Total Rental Applications | Inspections Completed | Less than 80% AMI | Poverty | Disabled | English as Second Language | Age Dependent (Less than 5, Over 65) | Minority Group | Unemployment |
|--------------------|--------------------------|---------------------------|-----------------------|-------------------|--------------|-------------|----------------------------|--------------------------------------|----------------|--------------|
| Nemaha | 27 | 10 | 20 | 39.0% | 12.7% | 10.1% | 2.8% | 20.1% | 1.2% | 2.8% |
| Pierce | 159 | 13 | 140 | 35.1% | 9.8% | 6.8% | 1.8% | 19.3% | 0.9% | 1.6% |
| Platte | 88 | 14 | 59 | 35.6% | 8.5% | 5.6% | 16.3% | 17.2% | 4.1% | 3.8% |
| Richardson | 14 | 7 | 14 | 46.8% | 13.0% | 9.4% | 1.1% | 24.7% | 1.7% | 2.2% |
| Saline | 15 | 1 | 10 | 35.7% | 12.4% | 6.8% | 23.2% | 15.0% | 5.8% | 2.1% |
| Santee Indian Res. | 4 | 0 | 0 | - | - | - | - | - | - | - |
| Sarpy | 726 | 270 | 767 | 30.2% | 5.7% | 6.6% | 8.6% | 11.8% | 3.5% | 2.2% |
| Saunders | 146 | 16 | 110 | 33.7% | 7.8% | 8.3% | 2.8% | 18.7% | 1.0% | 1.7% |
| Stanton | 32 | 7 | 21 | 36.3% | 7.5% | 6.5% | 5.9% | 17.9% | 1.8% | 2.0% |
| Thurston | 90 | 35 | 94 | 55.3% | 23.9% | 8.9% | 3.9% | 11.8% | 13.7% | 9.6% |
| Washington | 55 | 26 | 59 | 32.7% | 6.9% | 9.8% | 2.5% | 17.8% | 1.0% | 1.6% |
| Total | 5,457 | 1,333 | 5,001 | 40.2% | 10.9% | 7.9% | 8.8% | 19.1% | 3.1% | 2.5% |

Communities impacted by disasters face numerous challenges in the aftermath of the event. Health and safety risks increase when residents inhabit damaged properties and when properties damaged beyond repair sit vacant. Table 2-23 shows that of FEMA IA applicants:

- Nearly 56% of residents remained in their damaged homes post-disaster.
- Roughly 37% were displaced from their residence at the time of the disaster, living in various reported situations.
- Twenty-one applicants reported residing in mass shelters after the storms.⁷⁵

Table 2-23: Owner and Renter Displacement Status^{76, 77}

| | Damaged Dwelling | New Rental Unit | Displaced | Total |
|------------------|------------------|-----------------|-----------|-------|
| Owner | 3,298 | 289 | 1,869 | 5,456 |
| Renter | 481 | 229 | 623 | 1,333 |
| Total | 3,779 | 518 | 2,492 | 6,789 |
| Percent of Total | 56% | 7% | 37% | 100% |

⁷⁵ FEMA Database last updated 03/16/2020.

⁷⁶ Ibid.

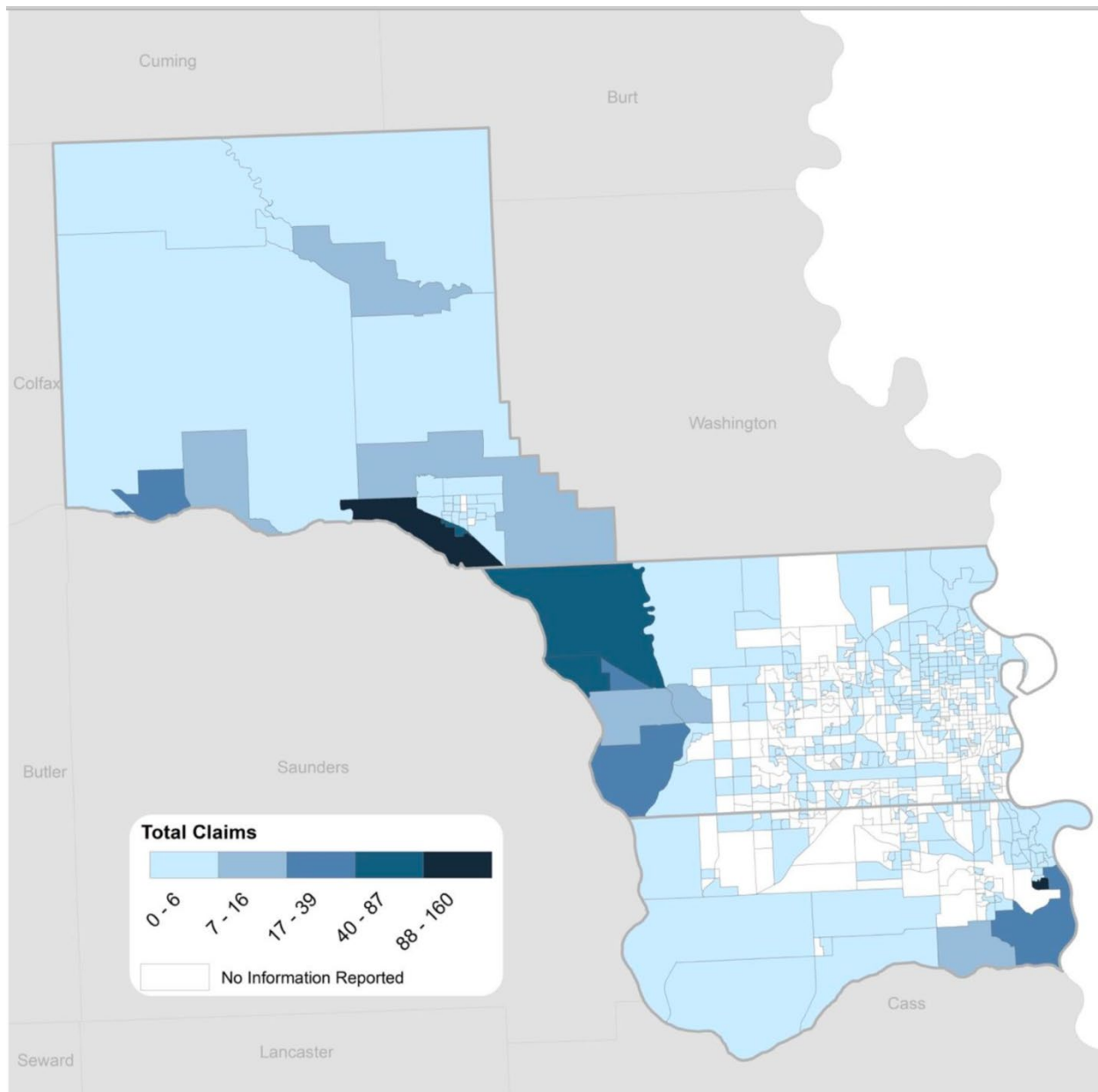
⁷⁷ This data does not specify the reason for displacement.

Renters were eligible to apply for assistance to help pay for monthly rental assistance and replace damaged or destroyed personal property. In total, there were 1,333 applications submitted by renters with only 569 (42%) approved to receive assistance. The average payment for rental assistance was \$1,430.⁷⁸ When compared to Nebraska's median monthly rental payment (\$805),⁷⁹ the average rental assistance received accounts for less than two months of rent. Figure 2-18 shows the density of rental applications in the HUD-defined MID counties (69% of applicants approved for rental assistance were located in the HUD-defined MID).

⁷⁸ FEMA database last updated 03/16/2020: average of all rental assistance awarded.

⁷⁹ US Census Bureau. *2015-2018 American Community Survey 5-year Data*. Retrieved at: <https://data.census.gov/cedsci/table?d=ACS%205-Year%20Estimates%20Data%20Profiles&table=DP04&tid=ACSDP5Y2018.DP04&q=0400000US31>

Figure 2-18: Total Individual Assistance Claims from Renters by Census Block Group



2.4.2.2 HOUSING CHARACTERISTICS

While moving homes from floodplains and replacing (versus repairing) mobile homes may provide residents with more suitable living situations, cost-effectiveness must be taken into account when making determinations about the programs that will be more beneficial to Nebraskans. Table 2-24 outlines the housing types reported on FEMA applications and Figure 2-19, Figure 2-20, and Figure 2-21 show the distribution of these housing types. These figures show the high density of mobile homes within the HUD-defined MID.

Table 2-24: Owner and Renter Housing Types Impacted⁸⁰

| Housing Type | Owner Applicants | Renter Applicants | Unknown | Total |
|------------------|------------------|-------------------|-----------|--------------|
| Apartment | 4 | 142 | 3 | 149 |
| Boat | 0 | 1 | 0 | 1 |
| College Dorm | 0 | 1 | 0 | 1 |
| Condo | 14 | 5 | 0 | 19 |
| House/Duplex | 4,278 | 809 | 62 | 5,149 |
| Military Housing | 0 | 1 | 0 | 1 |
| Mobile Home | 685 | 221 | 6 | 912 |
| Other | 400 | 132 | 15 | 547 |
| Townhouse | 13 | 3 | 0 | 16 |
| Travel Trailer | 63 | 18 | 2 | 83 |
| Total | 5,457 | 1,333 | 88 | 6,878 |

⁸⁰ FEMA database last updated 03/16/2020.

Figure 2-19: Most Impacted Housing Type by Census Block Group for Douglas County

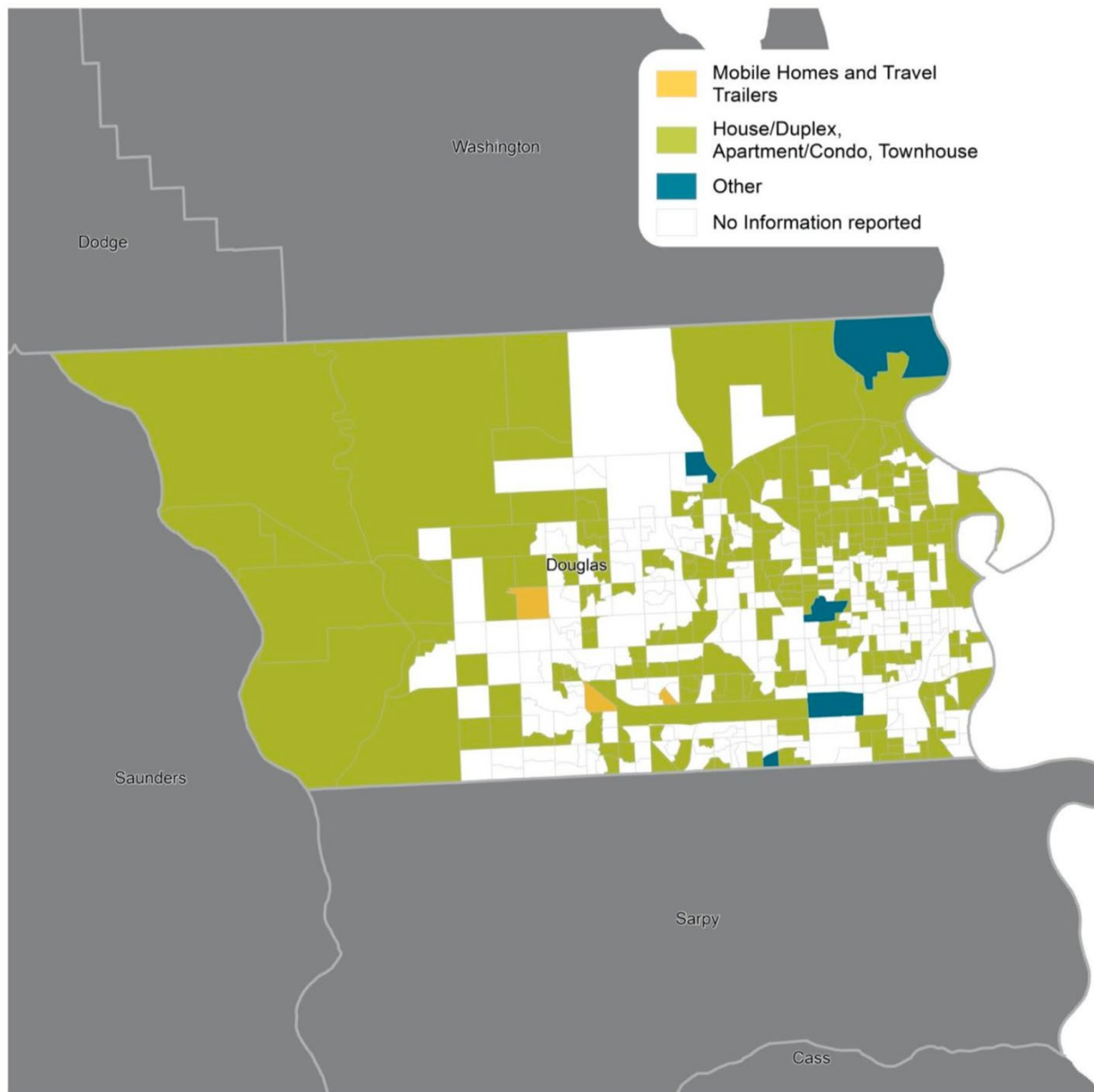


Figure 2-20: Most Impacted Housing Type by Census Block Group for Dodge County

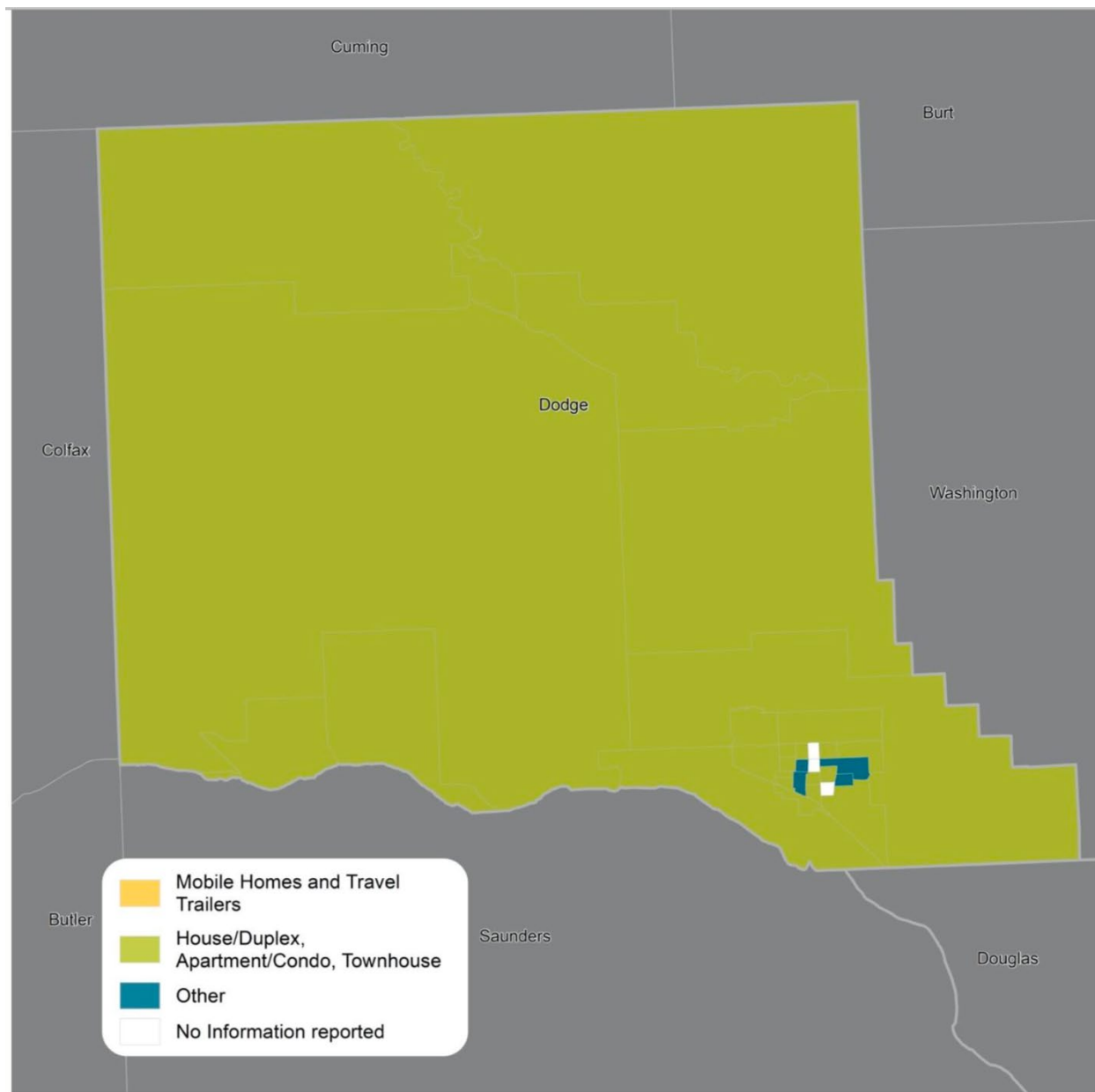


Figure 2-21: Most Impacted Housing Type by Census Block Group for Sarpy County



2.4.2.3 AFFORDABLE AND PUBLIC HOUSING

Lack of affordable housing throughout the State of Nebraska presented challenges prior to the 2019 disasters. Affordable rent is defined as 30% of gross annual household income for a low-income family whose income equals 50% of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, divided by 12 (months per year). The 2019 floods exacerbated the discrepancy of affordable housing, particularly in Sarpy, Dodge, and Douglas counties, for which nearly one-third of those that applied for federal housing assistance were renters.

DED conducted a survey of all impacted PHAs and counties to identify unmet needs specific to public housing authorities. The survey was distributed via email to PHA representatives in disaster-declared areas requesting information regarding whether housing or rental units were damaged from the storm events, the extent of damage, the status of repair, total damage costs, resources available to address damages, and remaining costs and repairs necessary to restore the units. DED further engaged individuals who replied to the survey to fully understand and support efforts to address the damage. Through this process, DED identified four PHA facilities with reported damage, many of which have had major repairs completed. The remaining unmet needs for these facilities are outlined in Table 2-25.

Table 2-25: Reported Impacts to Public Housing Authorities

| County | Name of Facility | Estimated Remaining Unmet Need |
|---------|----------------------------------|--------------------------------|
| Douglas | Douglas County Housing Authority | \$22,100 |
| Dodge | Jefferson House Youth Shelter | \$41,750 |
| Madison | Bright Horizons Shelter | \$17,325 |
| Boyd | Lynch Public Housing Authority | \$28,394 |

Nebraska did not identify any recipients of the Section 8 Housing Choice Voucher Program as having been impacted by the floods. While DED cannot definitively state that no Housing Choice Voucher recipients were impacted, no indication from the Housing RSF reporting, the PHA survey, or LTRG reports identified any such impact. FEMA data identified four owner-occupied units as being impacted in the Santee Indian Reservation.

Various housing authorities have or are conducting studies and outreach to communities with vulnerable populations to determine the need to address the lack of affordable housing.⁸¹ For example, the Sherwood Foundation is currently working to identify additional housing units impacted by the 2019 disasters on behalf of the City of Omaha, with the intent to inform strategies

⁸¹ This information was obtained from the Sarpy County Housing Study and to be obtained from the Dodge County housing study (ongoing).

for the City of Omaha and identify gaps between their current stock and future need.⁸² If other such studies are conducted within other areas of the state, that information will also be considered where it is made available to the State of Nebraska. The Housing Resilience Planning Program also allocates funding specifically to support housing recovery plans, which will support the investigation and response to these data across jurisdictions.

Ongoing Outreach

DED will conduct additional outreach and coordination with the State's partners to ensure that funds support the recovery of federally protected classes and other vulnerable populations, including LMI persons of all races and ethnicities. In addition to coordination with NIFA, the administering agency for LIHTC, and their community partners, DED will also continue engagement with PHAs, Tribal Nation representatives, economic development districts, and housing advocacy groups. Coordination through the Governor's Task Force will ensure that engagement is inclusive of key partners involved in recovery. Outreach efforts will include an event with these groups to inform the program design to identify impacts and guidelines for the CDBG-DR housing programs. For outstanding needs, CDBG-DR has prioritized public housing under its housing program scoring criteria. Under the Affordable Housing Construction Program, funds may be directed to new construction or unit rehabilitation to offset the impact of disaster-related losses in affordable housing, including rental housing.

2.4.3 IMPACT ON THE ECONOMY

To understand the impacts on the state's economy, pre-disaster economic conditions and issues must be considered. Statewide and regional unemployment rates limit the pool of available skilled workers, hindering rebuilding and recovery efforts. Long-standing patterns of college-educated adults moving from smaller communities within the state to its larger cities, or out of state entirely, have compounded these workforce issues.⁸³ The economic after-effects of the 2019 disasters, combined with the onset of COVID-19 and preexisting factors, will likely impose long-term impacts on the state as a whole.

2.4.3.1 SMALL BUSINESS UNMET NEEDS ANALYSIS

The Small Business Administration (SBA) makes low-cost disaster loans available to qualified small businesses. The SBA defines small business as a "business with a maximum of between 250 and 1,500 employees, depending upon the industry. They're privately owned corporations, partnerships, or sole proprietorships that have less revenue than larger businesses."⁸⁴ According to the SBA's business and economic injury loss data, 228 businesses across the state applied for SBA business loans after the 2019 disasters. Among the 228, 176 of these applications came from within the HUD-defined MID. Of the businesses that applied for assistance, 68 were approved for loans, totaling approximately \$8,548,200. Thirty-one of the approved loans totaling

⁸² Ibid.

⁸³ Nebraska Department of Economic Development, January 22, 2020. Economic Recovery Support Function Coordination Meeting.

⁸⁴ Small Business Administration, 2020. Size Standards. Retrieved at <https://www.sba.gov/federal-contracting/contracting-guide/size-standards>.

\$3,698,900 were cancelled for reasons such as changed circumstances, notification of insurance payout, or identification of alternate sources of funding.

SBA calculated total verified business losses (losses verified for initial loan determination) of \$22,417,026 for real estate repair and reconstruction, debris removal, land improvements, lost inventory, machinery and equipment, furniture and fixtures, and leasehold improvements. SBA and insurance payouts to businesses totaled \$5,174,335, resulting in potential unmet needs of \$17,242,691 (Table 2-26).

Table 2-26: Summary of Economic Assistance⁸⁵

| | Economy |
|--|--------------|
| Amount of Estimated Damage: <i>Property + Content Losses</i> | \$22,417,026 |
| Amount of Funds Available: <i>Insurance Payouts + Approved Loans</i> | \$5,174,335 |
| Unmet Needs: <i>Damage – Funds Available</i> | \$17,242,691 |

Despite arriving at a higher estimation of unmet economic revitalization needs, this Action Plan does not allocate funding for these needs due to a subsequent injection of financial support for the private sector (COVID-19 relief). Upon preliminary review of applications for COVID-19 related funding, it was apparent that the economic needs attributed to that event, along with available economic recovery resources, were much more significant than those attributed to the 2019 disasters. Furthermore, these mitigating factors make it increasingly difficult to draw the necessary nexus between needs and the 2019 disaster. See the *Foreword* section of this Action Plan for further discussion of how funds are being prioritized in the wake of COVID-19.

2.4.4 FEDERAL ASSISTANCE PROVIDED

Various funding streams are available to assist with the recovery from DR-4420. These funding sources range from local to federal assistance with varying degrees of allowable uses and amounts. Communities should assess all available sources to determine the viability of each source and their capacity to administer the funds appropriately.

2.4.4.1 FEDERAL EMERGENCY MANAGEMENT AGENCY

The presidential declaration for DR-4420 enabled FEMA to allocate funding for immediate emergency recovery needs in Nebraska. With the declaration, IA and PA was made available to supplement local recovery efforts in the designated counties and tribal areas.⁸⁶ Designated counties (areas included in disaster declaration as sustaining damage) are eligible for one or more of the following types of assistance:

- **FEMA Individuals and Households Program (IHP):** Through IHP, FEMA provides IA directly to individuals and households, as well as state, local, and tribal territory governments to support individual survivors. For this declaration, assistance available

⁸⁵ Data obtained from SBA database provided and current as of March 10, 2020.

⁸⁶ Funding will be provided directly to federally recognized tribes.

through the IHP program included: Federal IHP Housing Assistance and Other Needs Assistance (ONA).

- **FEMA PA Emergency Work Assistance (Categories A and B):** FEMA is authorized to provide PA funding for Emergency Work, including emergency protective measures and debris removal. Emergency Work is that which must be done immediately to save lives, protect public health and safety, protect improved property, or eliminate or lessen an immediate threat of additional damage.
- **FEMA PA Permanent Work Assistance (Categories C through G):** Permanent Work is work required to restore a facility to its pre-disaster design (size and capacity) and function in accordance with applicable codes and standards.

Table 2-27 represents the final awards for each category of funding available to eligible counties in Nebraska.

Table 2-27: FEMA Approved Financial Assistance

| Category | FEMA Dollars Approved (as of 03/2020) | | |
|-------------------------------------|---------------------------------------|---------------------------------|-------------------------------|
| Individuals and Households Programs | Housing Assistance (HA) | Other Needs Assistance (ONA) | Total |
| | \$24,155,059.49 | \$2,919,755.91 | \$27,074,815.40 ⁸⁷ |
| Public Assistance Grants | Emergency Work – Category A-B | Permanent Work – Categories C-G | Total |
| | \$9,998,764.41 | \$26,571,683.28 | \$36,570,447.69 ⁸⁸ |

2.4.4.1.1 Individuals and Households Program

IHP assistance provides financial help and direct services to eligible individuals and households who have uninsured or underinsured necessary expenses and serious needs. IHP assistance is not a substitute for insurance and cannot compensate for all losses caused by a disaster; it is intended to meet basic needs and supplement disaster recovery efforts.

IHP assistance is limited to 18 months following the date of the disaster declaration. The period of assistance begins at the date of the presidential declaration and not the date on which the disaster is designated for IA. Disaster declaration DR-4420 was issued on March 21, 2019 and, as of the date of this report, assistance for the State of Nebraska under DR-4420 is slated to end September 21, 2020.

2.4.4.1.2 Public Assistance: Emergency and Permanent Work

Eligibility for public assistance is based on four factors: applicant, facility, work, and cost.

- **Applicant:** Must be a state, territory, tribe, local government, or nonprofit organization.
- **Facility:** Must be a building, public works, system, equipment, or natural feature.

⁸⁷ IHP dollars have been approved but not necessarily disbursed.

⁸⁸ Dollars obligated will be made available to the state following FEMA review and approval.

- **Work:** Categorized as either emergency or permanent. The work must be required as a result of the declared incident, located within the designated disaster area, and the legal responsibility of the applicant.
- **Cost:** Funding must be tied directly to eligible work and be adequately documented, authorized, necessary and reasonable. Eligible costs include labor, equipment, materials, contract work, as well as direct and indirect administrative costs.⁸⁹

FEMA evaluates the estimated cost of federal and non-federal public assistance against the statewide population to give some measure of the per capita impact within the state. FEMA uses a figure of \$1 per capita, which is adjusted annually based on the Consumer Price Index for All Urban Consumers, as an indicator that the disaster is of such size that it might warrant federal assistance. For a jurisdiction to qualify for a presidential disaster declaration, the estimated cost of damage must meet or exceed \$1 million in public assistance damage per disaster.⁹⁰

FEMA also examines the reported damage at the county and local government level because at times there are extraordinary concentrations of damage that might warrant federal assistance even if the statewide per capita is not met. This is particularly true where critical facilities are involved or where localized per capita impacts might be extremely high.

Counties deemed ineligible for PA may still have sustained damage, but it was not severe enough to include that county in the declaration based on the pre-determined threshold.

2.4.4.1.3 Hazard Mitigation Assistance

Nebraska first developed and launched its mitigation approach in its 1985 Hazard Mitigation Plan, which was developed after a series of tornadoes, floods and severe storms in 1984.⁹¹ Nebraska's mitigation efforts provide background and context for the additional costs and needs for mitigation activities. Successful programs have expanded public support for these initiatives, particularly through projects to rebuild and repair dams and levees on the Missouri River and Platte River, as well as acquisition projects for removal of flood prone structures.

FEMA's Hazard Mitigation Assistance (HMA) program is an umbrella of funding programs FEMA uses to support communities in their effort to reduce risk to hazards and increase resilience. Specific to recovery, FEMA HMGP provides funding for hazard mitigation projects to states following a presidentially declared disaster. HMGP can fund both housing and infrastructure projects; elevation and the acquisition and demolition of private homes; and community flood control projects such as repairing drainage issues, ditch improvements, and repairing or replacing flood walls. DED will make cost estimates and planning assumptions based on existing data from NEMA's implementation of HMGP. The Infrastructure Match Program review process and scoring criteria are designed to incorporate review of cost reasonable mitigation approaches.

⁸⁹ Federal Emergency Management Agency, 2020. *Public Assistance: Local, State, Tribal, Private Nonprofit*. Retrieved at: <http://www.fema.gov/public-assistance-local-state-tribal-and-non-profit>

⁹⁰ Per 44 CFR § 206.48.

⁹¹ State of Nebraska, 2019. *2021 Hazard Mitigation Plan*. Retrieved at <https://nema.nebraska.gov/recovery/nebraska-state-hazard-mitigation-program>.

HMGP funding is dependent on the amount of FEMA IHP and PA provided to states post-disaster. FEMA provides 15% of the first \$2 billion provided through FEMA IHP and PA and 10% of the next \$8 billion. Based on the estimated funding provided through FEMA IHP and PA, currently, the state understands that \$55 million is expected in the next six months; however, the total expected amount of funding and delivery time is unknown.

The Nebraska Emergency Management Agency most recently updated the State's Hazard Mitigation Plan (HMP) in 2021. The plan serves as a key resource for the overall risk assessment and identification of capabilities relating to mitigation activities across the State of Nebraska. DED shares NEMA's approach in structuring funds to be implemented by subrecipients that can leverage local knowledge of mitigation needs and building practices. A network of implementing agencies in jurisdictions already exists through Natural Resource Districts, Public Power Districts (PPDs), state agencies, and local governments that NEMA highlights as core proponents of mitigation activities.

2.4.4.2 COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY

Public Law 116-20 appropriated CDBG-DR funds for 2019 disasters with HUD allocating \$108,938,000 to Nebraska in response to damage caused by Winter Storm Ulmer and related events (DR-4420). The CDBG-DR allocations are based on the sum of the following factors:

- Repair estimates for seriously damaged owner-occupied units without insurance (with some exceptions) in the HUD-defined MID areas after FEMA and SBA repair grants or loans are applied;
- Repair estimates for seriously damaged renter-occupied units with very low-income renters in the HUD-defined MID areas;
- Repair and content loss estimates for small businesses with serious damage denied by SBA; and
- The estimated local cost share for Public Assistance Categories C to G.

Grantees are required to spend no less than 80% of the allocation, net administration and planning costs, on the HUD-defined MID counties and zip codes. Projects within HUD-defined MID counties will be prioritized to meet this requirement. Table 2-28 shows the total amount required to be spent in the HUD-defined MID counties on housing and infrastructure needs and the balance to be spent in the remaining counties.

Table 2-28: Nebraska HUD CDBG-DR Allocation for Unmet Needs⁹²

| | Allocation |
|---|--------------|
| Allocation Required for HUD-defined MID Counties/Zip codes 80% of Total Allocation | \$80,392,880 |
| Balance for Remaining Counties | \$20,098,220 |

⁹² Allocations, Common Application, Waivers, and Alternative Requirements for Disaster Community Development Block Grant Disaster Recovery Grantees, 85 Fed. Reg. 17 (January 27, 2020). *Federal Register: The Daily Journal of the United States*. Web. 27 January 2020.

| | Allocation |
|-----------------------------|----------------------|
| Administration and Planning | \$8,446,900 |
| Total Allocation | \$108,938,000 |

2.4.4.3 FEDERAL HIGHWAY ADMINISTRATION EMERGENCY RELIEF

Federal Highway Administration (FHWA) classifies urban and rural roadways by *road function*. Each function class is based on the type of service the road provides to the motoring public, and the designation is used for data and planning purposes.⁹³ Recovery of road and bridge infrastructure is dependent on the type of road or bridge damaged. The FHWA certified roads are potentially eligible for Federal Highway Administration Emergency Relief (FHWA ER) funding, while all other roads are potentially eligible for FEMA PA funding. A summary of damage and funding available to support recovery of FHWA is summarized in Table 2-29. FEMA's PA Program may pay for repairs to roads not covered by the FHWA ER program. Figure 2-22 shows the distribution of FHWA roads in the state.

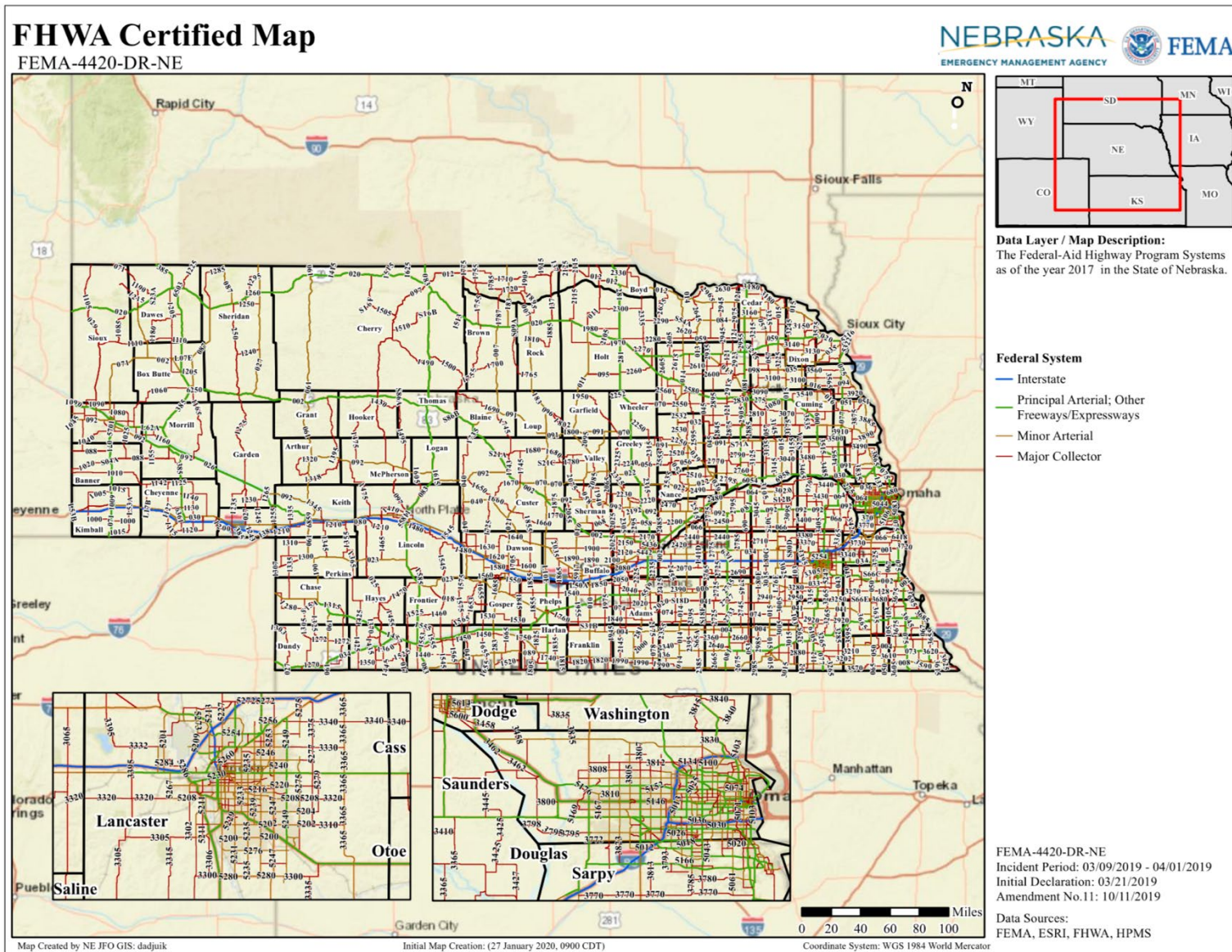
Table 2-29: Summary of FHWA-ER Program⁹⁴

| | Amount |
|--|---------------|
| Damage to FHWA roads | \$201,000,000 |
| Anticipated Funding for FHWA Road Recovery | \$160,800,000 |
| Unmet Needs for FHWA Road Recovery | \$40,200,000 |

⁹³ Federal Highway Administration, 2000. *Road Functions Classification*. Retrieved at: https://safety.fhwa.dot.gov/speedmgt/data_facts/docs/rd_func_class_1_42.pdf.

⁹⁴ United States Department of Transportation Federal Highway Administration, 2019. *Special Federal-aid Funding: Emergency Relief Program*. Retrieved at: <https://www.fhwa.dot.gov/programadmin/erelief.cfm>

Figure 2-22: Map of Statewide FHWA Roads



2.4.4.4 US ARMY CORPS OF ENGINEERS REHABILITATION AND INSPECTION PROGRAM

The USACE RIP supports community recovery by providing funding for flood control and restoration projects. This program was created to ensure flood control projects continue to protect communities and if they are damaged, restored immediately. The extent of the damage to flood control and restoration projects from the 2019 disasters supported by the USACE RIP has continued to evolve throughout the recovery process. As of February 2020, the total damage has been reported as high as \$500 million for USACE RIP eligible projects, but under \$33 million has been obligated. The USACE RIP requires a non-federal cost-share of 20% for repairs to non-federal systems.

This cost was unaccounted for in the unmet needs calculation by HUD and may reflect a potential recovery gap not reflected in the UNA.

2.4.4.5 UNITED STATES DEPARTMENT OF AGRICULTURE NATURAL RESOURCES CONSERVATION SERVICE EMERGENCY WATERSHED PROTECTION PROGRAM

The United States Department of Agriculture (USDA) NRCS EWPP provides recovery funding to local communities to support long-term restoration of infrastructure and the environment. Cities, counties, towns, conservation districts, and federally recognized tribes are eligible. The extent of the damage to flood control projects from the 2019 disasters supported by the USDA NRCS EWPP has continued to evolve throughout the recovery process. After evaluating the potentially eligible EWPP sites, the NRCS began working with eight levee sponsors, for 73 project sites, in seven different counties.⁹⁵ The total approved funding for the EWPP as of January 2020 is \$4.1 million, but this number is expected to increase.⁹⁶ Depending on the project, NRCS will fund between 75% and 90%, with the local cost-share between 10% and 25%.

This cost was unaccounted for in the unmet needs calculation by HUD and may reflect a potential recovery gap not reflected in the UNA.

⁹⁵ USDA, n.d. "NRCS Emergency Watershed Protection Program Implementation in Nebraska Following the 2019 Disaster."

⁹⁶ Ibid.

3 METHOD OF DISTRIBUTION

As the UNA and HUD's early assessments both indicate (see Figure 2-2), DR-4420 generated catastrophic impacts to infrastructure, resulting in significantly higher losses in that category than economic and housing needs. To address the extensive infrastructure needs within the state, the state is prioritizing CDBG-DR funding under DR-4420 for infrastructure recovery. This decision was also informed by subsequent allocations of funding under the CARES Act, which made additional funds available for housing support and economic recovery. Further still, the realized and forecasted revenue loss across municipal and state governments are likely to prove challenging for municipalities struggling to contribute to local match requirements. CDBG-DR funds will be distributed in accordance with Figure 3-1, which is described in greater detail in section 5.

Figure 3-1: Nebraska's CDBG-DR Program Method of Distribution

