

CDBG-DR ACTION PLAN

SUBMITTED BY: CITY OF LITTLE ROCK.

DR
4698



CDBG-DR ACTION PLAN
DR-4698
(January 1, 2025, through December 31, 2031)

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Change Log

Version (Date)	Summary of Changes Made

Table of Contents

1. Executive Summary.....	6
1.1 Overview	6
1.2 Disaster-Specific Overview	6
1.3 Most Impacted and Distressed (MID) Areas.....	10
2.0 Unmet Needs Assessment.....	14
2.1 Overview	14
2.2 Background and Process.....	14
2.2.1 Data Sources and Limitations	14
2.3 Housing.....	14
2.3.1 Rental and Owner-Occupied Single Family and Multifamily Housing	14
2.3.2 Homelessness, Emergency Shelters, and Transitional Housing.....	15
2.3.3 Summary of Housing Unmet Needs.....	15
2.4 Infrastructure	16
2.4.1 FEMA Public Assistance.....	16
2.4.2 Infrastructure Summary.....	18
2.4.3 Summary of Infrastructure Unmet Need	19
2.5 Economic Revitalization	19
2.5.1 Summary of Unmet Economic Revitalization Needs.....	19
3.0 Mitigation Needs Assessment.....	21
3.1 Background	21
3.2 Previous Mitigation Efforts.....	22
3.2.1 Ward-by-Ward Drainage and Street Improvements	22
3.2.2 Tornado Recovery and Infrastructure Rebuilds	22
3.2.3 Grant-Backed Generator & Safe Room Projects	22
3.2.4 Ongoing Stormwater Management & Compliance.....	23
3.3 Risk Analysis.....	23
3.3.1 Dam Failure.....	24
3.3.2 Drought and Extreme Heat.....	24
3.3.3 Earthquake.....	24
3.3.4 Flood	25
3.3.5 Thunderstorm	26

3.3.6 Tornado	26
3.3.7 Wildfire	26
3.3.8 Winter Storm	26
3.4 Mitigation Priorities	27
3.5 Summary of Mitigation Needs Assessment	27
4.0 Connection Between Proposed Programs & Projects and Unmet Needs & Mitigation Needs....	29
4.1 Allocation and Award Caps	29
4.1.1 Funding Criteria.....	29
4.1.2 Ineligible Activities.....	30
4.1.3 Internal Controls	30
4.1.4 Distribution and Selection	30
4.2 Environmental Review.....	31
4.3 Program Details	31
4.3.1 Administration.....	32
4.3.2 Planning.....	32
4.3.3 Housing Programs	32
4.3.4 Infrastructure Programs.....	36
4.3.5 Mitigation Set-Aside Program	38
4.3.6 Economic Revitalization Program	40
4.3.7 Public Services Program	42
5.0 General Requirements.....	45
5.1 Consultation.....	45
5.2 Action Plan Amendments	45
5.3 Publication	45
5.4 Public Comments	46
6.0 Appendix.....	47
6.1 Certifications, Waiver, and Alternative Requirements.....	47
6.2 References	49

GENERAL INFORMATION

Grantee Name:	City of Little Rock
Entity Designated to Administer the Funds	City of Little Rock
Entity Designated Date Plan Submitted:	8/1/2025
Amount of funds allocated in the action plan:	\$20,895,000.00
Grantee Contact (Name):	Kevin Howard
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HUD Contact (Name):	David Blick
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1. Executive Summary

1.1 Overview

On January 16th, 2025, a new Community Development Block Grant Disaster Recovery (CDBG-DR) allocation notice was released by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register Notice.

Under the Federal Register Notice, Little Rock is eligible to receive an allocation of \$20,895,000 in disaster recovery funds for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et. Seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation. Per the Federal Register Notice, the only areas in which the funding can be expended lie in Presidentially Declared Disaster areas of Little Rock occurring during the incident period as defined as of March 31, 2023.

The administration of the CDBG-DR funds allocated in the AAN is subject to the guidance and requirements provided in Federal Register Vol. 90, No. 1754, January 8, 2025 (the “Universal Notice”), as amended.

City of Little Rock is the lead agency and responsible entity for administering the CDBG-DR funds allocated for disaster recovery following the 2023 storms. In compliance with the requirements outlined in the Universal Notice and those in the AAN, City of Little Rock (“CLR”) has developed this Action Plan for Disaster Recovery (“Action Plan”) detailing how funds will be allocated to address remaining unmet need from the 2023 weather event, in a way that is compliant with all federal, state, and local regulations, as required in the Universal Notice.

The 2025 Appropriations Act requires that CDBG-DR grantees expend 100% of the CDBG-DR funding within six years of the executed agreement between HUD and the grantee (CLR) which provides the grantee access to the federal funds. Unless an extension is granted by HUD, CDBG-DR programs must be carried out in a manner that all grants close out and audit/verification activities are completed within the six-year period.

1.2 Disaster-Specific Overview

On March 31, 2023, the City of Little Rock was hit by an EF-3 tornado. This was 1 of 147 tornadoes that occurred during a two-day period across the Upper Midwest, Mid-South and Southern U.S. This tornado had a maximum wind speed of 165 mph, with a path length of 25 miles, and maximum path width of 800 yards. There were no fatalities, and 54 injuries were reported.

The tornado started just southwest of Colonel Glenn causing disaster and continued northeast across a forested area and into a neighborhood off Capitol Hill Boulevard near Hartford and Denver Street. Trees were uprooted as the tornado moved northeast towards Kanis Road. The tornado swiftly intensified as it passed northeast over Chenal Parkway, severely damaging several apartment

buildings off Napa Valley Drive. The most severe residential damage occurred at these apartments, and along and west of North Shackelford. The tornado then crossed I-430 near the North Rodney Parham Road interchange, damaging a shopping center and a Kroger. Between I-430, Cantrell Road, and Arkansas River many homes, apartments, and businesses were severely damaged. Many trees were uprooted or trunks snapped at Murry Park before it crossed over into North Little Rock.

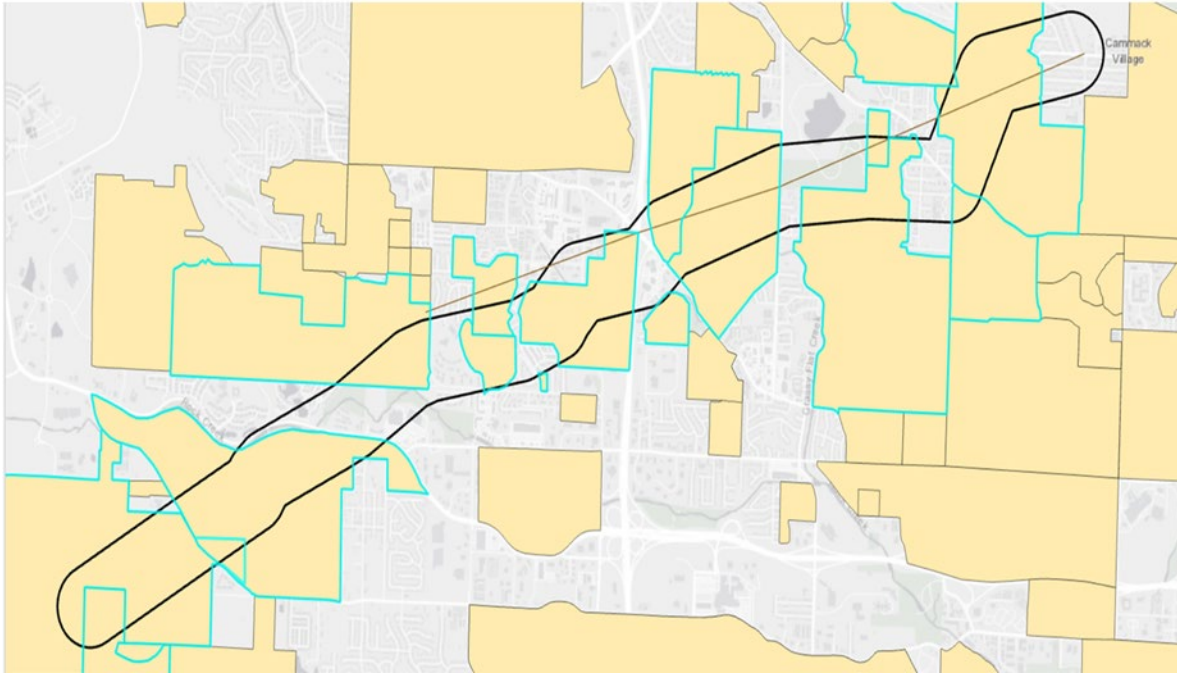


Figure 1- Tornado path through Little Rock

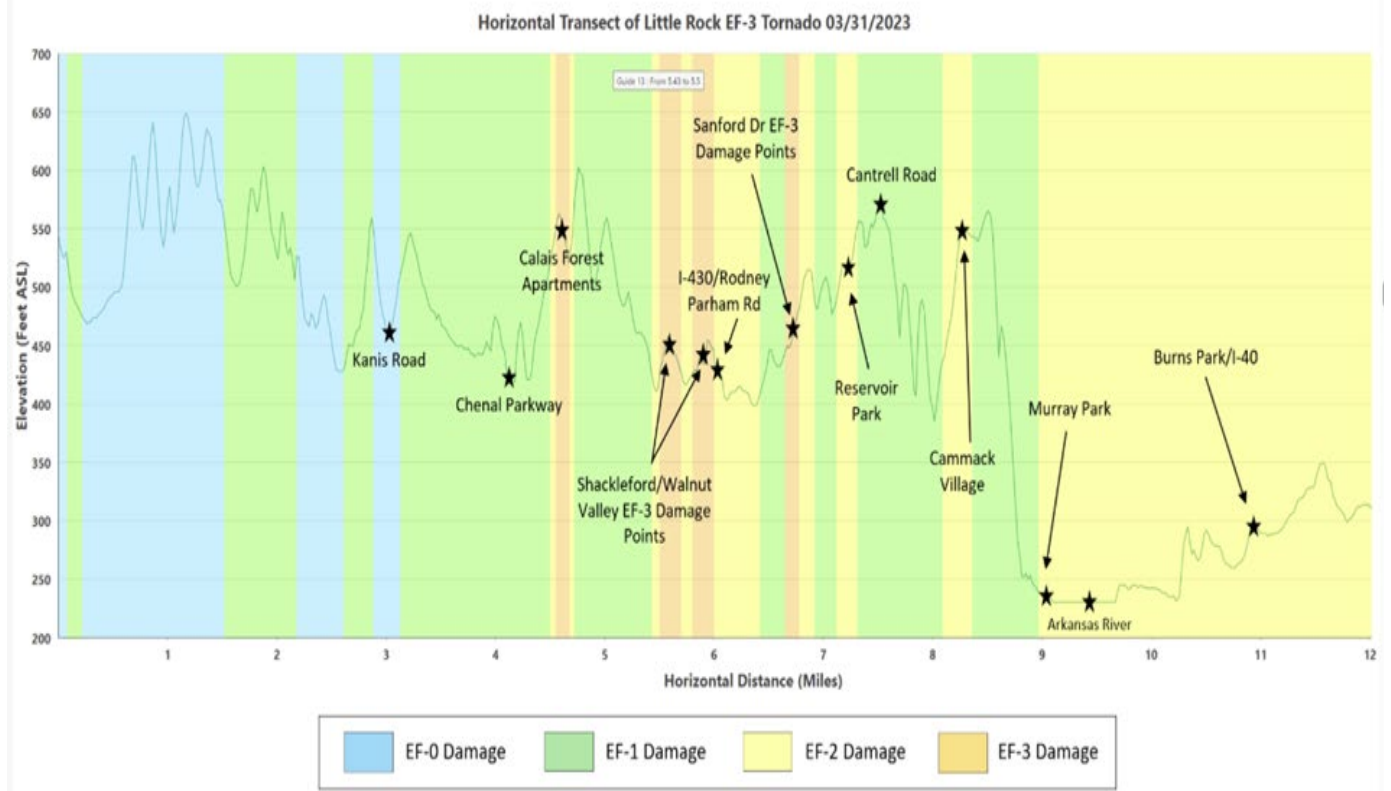


Figure 2-Horizontal Transect of 3/31/23 Tornado

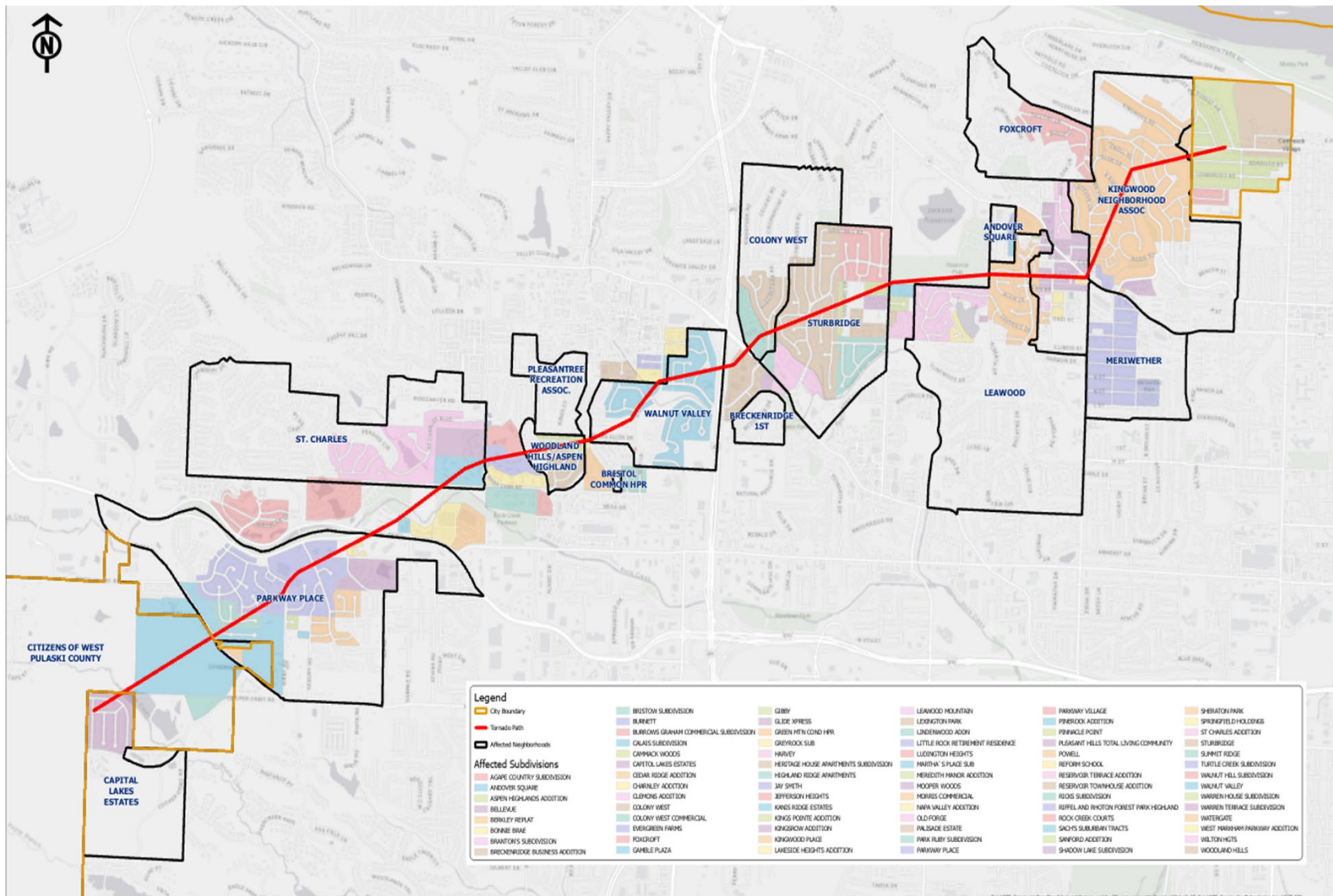


Figure 3 - Tornado path through Neighborhoods

1.3 Most Impacted and Distressed (MID) Areas

Based on the Federal Register notice, the City of Little Rock will spend 100% of its allocation in the HUD Identified MID area of Little Rock. The City plans to request a waiver to decrease the requirement of at least 70% of the total allocation to be expended to benefit Low-to-Moderate Income persons. Some sections of the affected area are considered Moderate-to-Middle Income. Proposed programs will include disaster recovery mitigation activities and may allow individual mitigation activities to ensure that Little Rock complies with the 15% mitigation expenditure requirement established by HUD for this CDBG-DR allocation of funds.

The Action Plan must also identify the use of all CDBG-DR funds, including criteria for eligibility and how the users address long-term recovery needs, restoration of infrastructure and housing, economic revitalization, and mitigation in the MID areas.

The following map includes Little Rock as a part of the Federal Disaster Declaration. HUD has hence determined Little Rock, Pulaski County, Arkansas as one of the MID areas for the qualifying disaster, Arkansas-Severe Storms and Tornadoes (DR-4698).

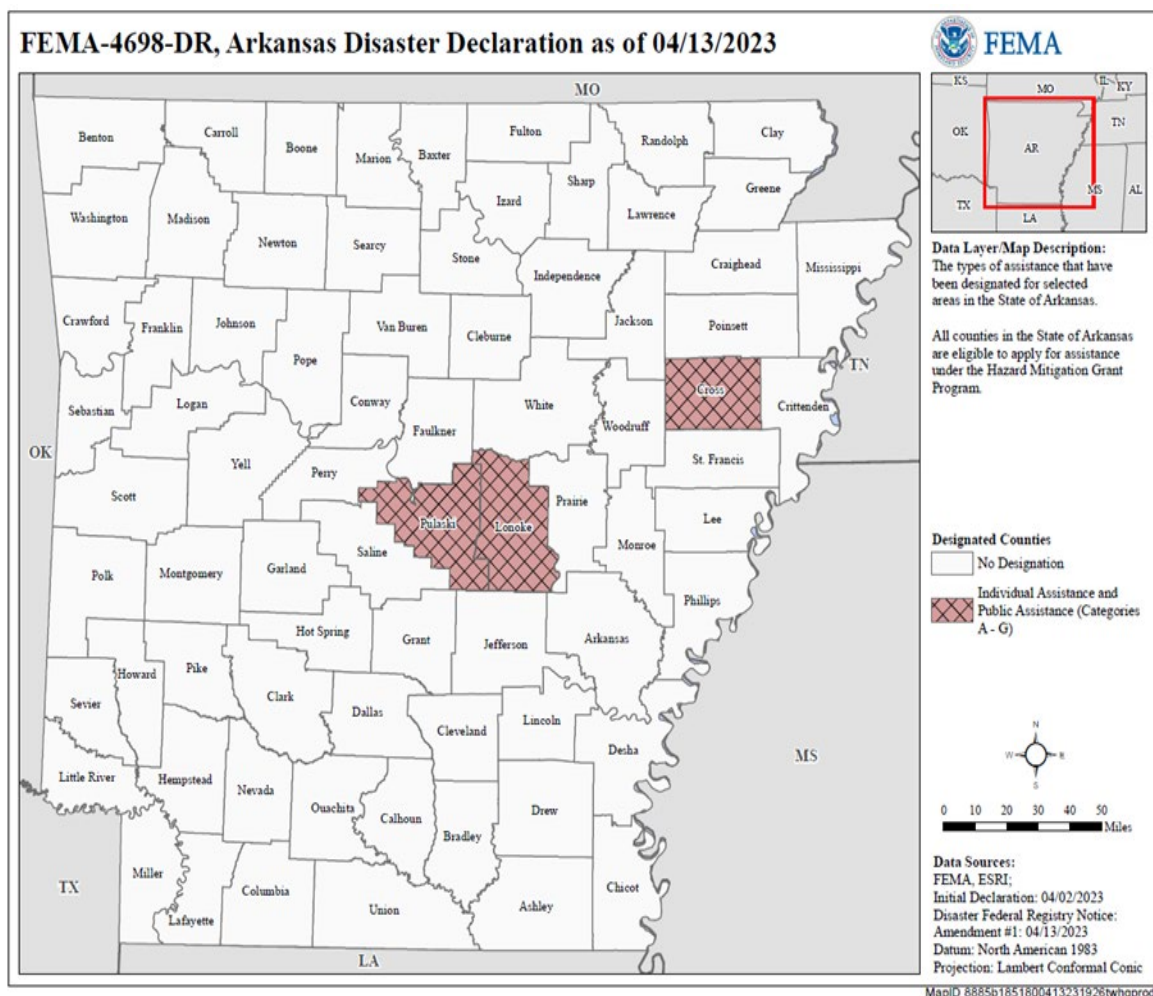


Figure 4 - FEMA-4698 Arkansas Disaster Declaration

Significant damage occurred to structures, with nearly 600 receiving major damage, and damage to forested areas produced a significant volume of organic debris. The Walnut Valley neighborhood was the most heavily affected. Below are pictures of the damaged areas.



Homes damaged at the corner of Shackleford and Cobble Hill Roads (EF-2)



Homes completely destroyed on North Shackleford Road (EF-3)



Napa Valley Apartment (EF-3)

The total estimated property damage was \$85,710,000. Over \$489 million insurance claims from Little Rock were paid by December 31, 2023, including from other area severe weather that day. One area policy holder reported that their Farm Bureau policy increased 35% following the tornado. Arkansas had the second highest insurance loss ratio in the United States in 2023 at 144% (i.e. \$1.44 paid as compensation to \$1.00 received by insurance companies).



Stairs from home in Walnut Valley Neighborhood 2024

2.0 Unmet Needs Assessment

2.1 Overview

HUD requires that grantees document the impacts and unmet needs that remain after initial recovery efforts through an Unmet Needs Assessment (UNA). The UNA supports program and funding decisions for the use of CDBG-DR funding. The UNA is divided into three cost categories: Housing, Infrastructure and Economic Revitalization. Within each of these three categories, the UNA provides a preliminary analysis and summary of disaster damage, initial efforts to recover from said damage, and the remaining unmet cost of further recovery.

2.2 Background and Process

HUD defines “unmet needs” as those resources necessary to recover from a disaster that are not likely to be addressed by other sources of funds. In order to gather a comprehensive understanding of these needs, various forms of available assistance must be reviewed and analyzed, such as FEMA funds and compensation from private insurance. By looking at the most current data available, the total cost of pre-assistance damage is quantified, totaled, and compared against the amount of assistance received. Then, by calculating the difference between the amount of aid required and the aid disbursed, an estimate of unmet need can be determined. Each of the categories identified in the Universal Notice (Housing, Infrastructure and Economic Revitalization) are individually assessed to determine an unmet need estimate across the HUD- identified MID area.

Please note that the current analysis consists of preliminary analyses and does not represent the full scope of potential findings. A more comprehensive analysis will be included in the final draft of the action plan.

2.2.1 Data Sources and Limitations

Data Sources Used in Unmet Needs Assessment Data	Sources
Housing Data	1. FEMA Individuals and Households Program (IHP) 2. HUD UN AAN Methods for Estimating Serious Unmet Needs for Housing 3. SBA Disaster Home Loans
Infrastructure Data	1. FEMA Public Assistance
Economic Revitalization Data	TBD

2.3 Housing

2.3.1 Rental and Owner-Occupied Single Family and Multifamily Housing

Per U.S. Census data, the owner-occupied housing unit rate for 2019-2023 was 54.2%.¹ Within the same time period, there were 86,853 households in Little Rock, with an average household size of 2.28 people. Median household income, in 2023 dollars, was \$60,583; 16.4% of Little Rock residents were classified as in poverty. Of the households inspected by FEMA's Individuals and Households Program, approximately 29% of inspected properties were owner occupied and 71% were renter occupied. Owner occupied units had 40 cases of damage classified as Major-low or higher, whereas renter occupied units had 100 cases.

2.3.2 Homelessness, Emergency Shelters, and Transitional Housing

Point in Time Data from AR-500 Little Rock/Central Arkansas Continuum of Care (CoC) indicates that while total homeless households decreased from 643 to 569 between 2023 to 2024, the overall number of homeless persons in the Continuum of Care's jurisdiction increased from 773 in 2023 to 1,016 in 2024.² The increase in approximately 31% of the homeless population for Little Rock and the surrounding area is prominently concentrated in the population of persons in households with at least one adult and one child. In 2023, persons in a household with at least one adult and one child represented 39 emergency shelter residents and 8 transitional housing residents; the 2024 Point-In-Time count recorded 285 residents in the population in emergency shelters, and 98 in transitional housing.³ While there was an increase in homelessness rates in Little Rock and the surrounding area between 2023 and 2024, funding to AR-500 Continuum of Care was not raised commensurately. In 2023, AR-500 was awarded \$2,705,820;⁴ in 2024, they were awarded \$2,705,483.⁵

2.3.3 Summary of Housing Unmet Needs

FEMA IHP inspection data of housing damage for Little Rock was categorized into one of five HUD categories. To meet the statutory requirement of "most impacted" per the Universal Notice, homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA inspected real property damage of \$8,000 or above, personal property damage \$3,500 or above.

Department of Housing and Urban Redevelopment housing multipliers established in the Universal Notice were used to calculate Major-low, Major-high, and Severe categories for the tornado disaster type. The multiplier was utilized in place of matching SBA data with FEMA IHP data, since there were less than 20 matches between the two data sets.

For owner occupied units, 28 units were classified as Major-Low, 3 properties as Major-High, and 9 properties as Severe in their damage levels. For renter occupied units, 29 were classified as Major-Low, 60 as Major-High, and 11 as Severe. HUD methodology assumes that landlords of renter occupied properties have adequate insurance, except when the unit is occupied by a household earning less than 50% of the area median income. Therefore, the FEMA IHP data on renter occupied

¹ (United States Census Bureau, 2024)

² (U.S. Department of Housing and Urban Development, 2024)

³ (U.S. Department of Housing and Urban Development, 2023)

⁴ (U.S. Department of Housing and Urban Development, 2024)

⁵ (U.S. Department of Housing and Urban Development, 2025)

units was filtered to include only households at or below the 2023 50% area median income for Pulaski County.

Funding Source	Total Damages	Assistance Provided	Unmet Need
FEMA Public Assistance and Additional Estimated Damages	\$10,911,503.00	\$685,411.04	\$10,226,091.96

2.4 Infrastructure

The State of Arkansas' infrastructure faces major challenges, with the American Society of Civil Engineers (ASCE) detailing the challenges faced across the State in their 2025 Infrastructure Report Card.⁶ Per the Report Card, 4.9% of bridges are rated structurally deficient, 193 dams have the potential to be high-hazard, and infrastructure is generally deteriorating across the State. As the State's capital and most densely populated area, the City of Little Rock experiences the most concentrated effects of these infrastructure deficiencies while also playing a vital role in driving solutions to these challenges.

In the aftermath of DR-4698, these challenges have only been exacerbated. The tornado caused widespread damage to infrastructure, severely impairing or destroying powerlines, transformers, gas lines, park amenities, roads, and key public facilities. Trees were also uprooted from the ground, hitting the aforementioned pieces of infrastructure and leaving debris scattered across the City. These impacts led to power outages across the City, blockage of roads, and inability to utilize public facilities that sustained damage. Following the event, the City and its partners have prioritized the repair and upgrade of its infrastructure portfolio, seeking to harden public facilities and utilities against a future severe weather event.

2.4.1 FEMA Public Assistance

The City of Little Rock's primary tool for addressing infrastructure damage caused by the 2023 storm and tornado is FEMA Public Assistance (PA). Following federally declared disasters, FEMA provides grants to state, local, tribal, and territorial governments as well as certain types of private non-profits to allow communities to quickly respond to and recover from major disasters or emergencies. Recipients operate public assistance programs where applicants with FEMA PA-eligible damage caused by the disaster can apply for a portion of the obligated PA funding to cover the costs of a repair project. This assistance takes the form of a federal and recipient cost share, where 75% to 100% of the recovery project cost is covered by federal funds and the remaining costs are covered by the recipient. The City of Little Rock is responsible for providing the remaining non-federal cost share, estimated to be around \$11.6 million.⁷

⁶ (American Society of Civil Engineers, 2025)

⁷ (U.S. Federal Emergency Management Agency, 2025)

Category	# of Damaged Sites	Sum of Approximate Cost	Sum of Federal Share	Sum of Non-Federal Share
A – Debris Removal	34	\$43,304,604.30	\$36,819,036.16	\$6,485,568.14
B - Emergency Measures ⁸	57	\$23,080,270.16	\$18,605,026.77	\$4,475,243.39
C – Roads and Bridges	9	\$548,079.20	\$411,059.41	\$137,019.79
D – Water Control Facilities	2	\$174,002.02	\$130,501.57	\$43,500.45
E – Buildings and Equipment	21	\$5,162,277.76	\$3,871,708.19	\$1,290,569.57
F – Utilities	8	\$7,544,027.70	\$5,658,020.31	\$1,886,007.39
G – Parks, Recreational Facilities, and Other Items	21	\$7,301,037.73	\$5,475,778.13	\$1,825,259.60
Grand Total	152	\$87,114,298.87	\$70,971,130.54	\$16,143,168.33
Total without Category B	95	\$64,034,028.71	\$52,366,103.77	\$11,667,924.94

2.4.1.1 Debris Removal

In the immediate aftermath of DR-4698, Little Rock’s neighborhoods, roadways, and forest areas were littered with fallen trees, power poles, and building wreckage. Major roadways such as Rodney Parham Road, Cantrell Road, Shackelford Road, and Breckenridge Drive were covered in structural debris that halted traffic for a day, while residential areas retained debris for longer periods of time.⁹ Due to the amount of debris and danger it posed to residents, public areas such as parks were left inaccessible.¹⁰

The City’s Public Works Department began clearing the debris shortly after the event, contracting DRC Emergency Services to assist in clearing curbside debris. Debris removal crews removed over 400,000 cubic yards of mixed debris, ground tree waste into mulch, and hauled it to landfills and drop-off sites like Reservoir Park.¹¹ While main roadways were cleared quickly, debris remains across the City’s communities, forested areas, and the drainage system. Debris removal activities for the event officially ended on June 25, 2023, at which point homeowners were responsible for remaining storm debris on private property. Following its initial debris removal activities and the

⁸ Category B is not considered in the unmet need calculation as CDBG-DR funds are used for unmet needs that remain after the initial response, while Emergency Measures are immediate, short-term costs considered part of the initial response.

⁹ (National Weather Service, 2024)

¹⁰ (City of Little Rock, Arkansas, 2023)

¹¹ (City of Little Rock, Arkansas, 2023)

remaining debris from DR-4698, the City is left with a nearly \$6.5 million remaining cost share for debris removal. As the cost share is the highest of all FEMA PA categories, the City is prioritizing debris removal activities by allocating \$1.5 million for Debris Removal activities under the Infrastructure program.

2.4.1.2 Roads and Bridges

The impact of DR-4698 on roads was immediately present, as the tornado caused extensive damage and obstructions to roads throughout Little Rock. The major highways Interstate-430 and Interstate I-40 were temporarily shut down as they were covered in downed trees, power poles, and overturned vehicles.¹² Key roadways such as Rodney Parham Road, Cantrell Road, Shackelford Road, and Breckenridge Drive were also obstructed by errant debris carried by the storm.¹³ In response, the City dispatched over 115 city workers to clear the obstructions from the roadways, allowing traffic to begin driving once more on all city roads 24 hours after the storm.¹⁴ The immediate impacts of the event on roads has been handled, leaving a low remaining cost share for roads and bridges when compared against other FEMA PA categories.

2.4.1.3 Buildings and Equipment

Little Rock's Fire Station 9 found itself in the direct path of the tornado on March 31, 2023. The station was destroyed, rendering a critical piece of the city's emergency response infrastructure unusable, and displacing 35-40 firefighters from their central station. In September 2023, months after DR-4698, the Little Rock Board of Directors allocated over \$87,000 towards demolition efforts.¹⁵ In July 2024, the City paid \$939,320.00, including a 15% contingency, for the construction of a temporary fire station with funds made available through the Federal Emergency Management Agency Temp Facility Special Project, Account No. 270519-G51DF231.¹⁶ In March 2025, the city broke ground to begin construction to rebuild the old two-story station into an 11,000 square foot complex with a tornado shelter for the fire department.¹⁷ The new station will be paid for with funds from the FEMA DISASTER FIRE (270519-G51DF231) special project, which made available \$5,902,950, including a 15% contingency, for the new station.¹⁸

2.4.2 Infrastructure Summary

Following DR-4698, the City of Little Rock's infrastructure portfolio sustained at least \$64 million in damage within the identified MID area. These damages include the debris created by the tornado, the impairment and loss of public facilities such as Fire Station 9, and destruction of utility infrastructure such as power lines. Each of these pieces of infrastructure are critical to the stability, health, and daily lives of the people of Little Rock. To address the remaining unmet need of nearly \$12 million and mitigate the impacts of future severe weather events, the City has allocated \$2.5 million of CDBG-DR funds to the Infrastructure program. Through this program, the City will continue

¹² (National Weather Service, n.d.)

¹³ (National Weather Service, 2024)

¹⁴ (Ringo, 2023)

¹⁵ (Birdwell, 2023)

¹⁶ (Office of the City Manager, Little Rock, Arkansas, 2024)

¹⁷ (Ellison, 2025)

¹⁸ (Office of the City Manager, Little Rock, Arkansas, 2025)

its debris removal efforts and begin park revitalization efforts to return parks back to the community while building resilience into park environments and their facilities.

2.4.3 Summary of Infrastructure Unmet Need

Funding Source	Total Damages	Assistance Provided	Unmet Need
FEMA Public Assistance and Additional Estimated Damages	\$64,034,028.71	\$52,366,103.77	\$11,667,924.94
Infrastructure Total	\$64,034,028.71	\$52,366,103.77	\$11,667,924.94

2.5 Economic Revitalization

2.5.1 Summary of Unmet Economic Revitalization Needs

DR-4698 caused immense damage to at least 29 business properties in Little Rock, according to a city survey conducted by the city's Emergency Management Division in April 2023, in the weeks after the tornado. Of a total of 55 buildings surveyed, 4 were rated 'Destroyed', 25 were rated 'Major' damage, 24 were rated 'Minor' damage, and 2 were rated 'Not Affected'.¹⁹

Much of the damage was concentrated in two shopping centers in Little Rock. At the Colony West Shopping Center, the cost to rebuild 36,580 square feet of a heavily damaged portion will cost \$3.25 million.²⁰ In the aftermath of the storm, several businesses at the shopping center also began recovery on their own. The grocery store, Kroger's, spent more than \$4 million on repairs, which allowed them to reopen 7 months after the tornado hit.²¹ Meanwhile, Rock City Running, a locally owned gear store, chose to relocate to a new location in the city instead of waiting for the extensive repair process.²²

At the Pavilion in the Park, restoration will likely cost over \$10 million. Construction began in January 2024, upon receipt of insurance payout, and is expected to continue through the summer of 2025.²³ Businesses within the Pavilion have also pursued their own repairs. For example, the restaurant Trio closed for two months in 2024 to conduct \$200,000 worth of kitchen repair, meant to address duct damage caused by the tornado.²⁴

The decision to rebuild or relocate has also been a matter of concern for businesses outside of the shopping centers. A local restaurant that experienced severe damage, Purple Cow, was rebuilt for

¹⁹ (Little Rock Emergency Management Division, 2023)

²⁰ (Arkansas Business Staff, 2024)

²¹ (Wilson, 2023)

²² (Nugent, 2023)

²³ (Waldon, 2024)

²⁴ (Hennigan, 2024)

\$1 million and reopened 18 months after the tornado in January 2025. A local bike shop, Trek Bikes, relocated and reopened in March 2024 after its original location was destroyed.²⁵

Financial assistance was made available by the U.S. Small Business Administration (SBA), but Little Rock businesses were unsuccessful in accessing the aid. Across the state, SBA provided 30 loans to businesses for \$2,301,000.⁶ Little Rock received none of these loans. Only five applications were initiated by Little Rock businesses, and all applications were ultimately withdrawn.²⁶

Funding Source	Total Damage	Assistance Provided	Unmet Need
TBD	TBD	TBD	TBD
Economic Revitalization Total	TBD	TBD	TBD

²⁵ (Gafner, 2024)

²⁶ (U.S. Small Business Administration, 2023)

3.0 Mitigation Needs Assessment

A Mitigation Needs Assessment (MNA) looks at the natural threats and hazards in a region to identify how resilience and mitigation measures can be built into recovery programs and projects. The Pulaski County Hazard Mitigation Plan (CHMP) provides an analysis of likely risks to the County, including the City of Little Rock, and how investments can be made to mitigate the impacts of those risks. The CHMP explains that the County is highly vulnerable to floods and tornados. In order to mitigate the impacts of these likely events, the CHMP identifies the following as key goals of Pulaski County and the City of Little Rock's mitigation efforts:

- Reduce the potential for loss of life, injury and economic damage created by exposure to natural hazard for residents of Pulaski County due to natural disasters.
- Provide a framework and coordination to encourage all levels of government and public and private organizations to undertake mitigation to minimize potential disasters and to employ mitigation in the recovery following disasters.
- Seek grants for mitigation projects through the State and Federal funding.
- Protect existing properties from natural disasters.

Along with the FEMA approved CHMP, this Mitigation Needs Assessment aligns with the Universal Notice and available data to identify priority mitigation strategies.

3.1 Background

The City of Little Rock is located in central Arkansas along the south bank of the Arkansas River, with the Ouachita Mountains to the west and the Mississippi Alluvial Plain to the east. The City's unique geography contains rolling hills, densely wooded areas, and multiple floodplains. The population of Little Rock is just above 200,000, with large population concentrations in the City's northern neighborhoods of Midtown, River Mountain, Rock Creek, Hillcrest, and Downtown - all of which are located in floodplains. Another significant amount of the population is made up by the Southern neighborhoods of the City, characterized by more forested areas. Due to the City's unique positioning by the Arkansas River and forest region, the City's communities are vulnerable to hazards such as flooding and tornado damage. These identified hazards, working in conjunction with Pulaski County's CHMP, serve as key factors that may influence data interpretation and the relevance of findings in the Mitigation Needs Assessment.

The CHMP has documented 12 major flooding and 73 flashflood events between 2015 and 2019, as well as tornado events dating back to 2016. According to the CHMP's findings, Pulaski County is likely to see at least one tornado event per year ranging from an EF1 to an EF2.²⁷

²⁷ Based on the Enhanced Fujita (EF) Scale that is used to rate a tornado based on estimated wind speed and related damage. DR-4698 was rated an EF3 tornado.

The CHMP does not include the tornado and storm events of DR-4698 as it was published in 2021, however there has been an increase in these and other severe weather events since the CHMP's publishing which demonstrates the need to lessen the vulnerability of Little Rock's communities.

3.2 Previous Mitigation Efforts

In the past several years, Pulaski County and its jurisdictions – including the City of Little Rock – have undertaken a number of hazard mitigation actions aimed at reducing the impacts of natural disasters. The CHMP states that the City initiated and coordinated the most recent countywide hazard mitigation planning process. Little Rock officials actively participated in risk assessments and supported the integration of hazard mitigation priorities into city-level emergency planning and infrastructure considerations. The city also collaborated with the Central Arkansas Planning and Development District to collect historical storm data and identify vulnerable infrastructure, laying the groundwork for future targeted mitigation efforts. These activities reflect an ongoing commitment to strengthening community resilience through coordinated planning, public education, and infrastructure improvements.

3.2.1 Ward-by-Ward Drainage and Street Improvements

Following the 2022 millage extension approval, the City Council allocated roughly \$4.5 million per ward, plus an additional \$1.3 million for city-wide initiatives, to fund 78 drainage and street projects.²⁸ These include road resurfacing, sidewalk upgrades, drive drainage enhancements, and intersection redesigns at key locations like Kanis Road/Panther Branch Drive and Chenal Boulevard/Chenal Club. By reducing surface runoff and improving drainage infrastructure, these efforts help mitigate flash flooding and localized storm-related water issues.

3.2.2 Tornado Recovery and Infrastructure Rebuilds

In response to DR-4698, the City:

- Rebuilt Fire Station 9 in Walnut Valley, replacing the original tornado-destroyed facility.²⁹
- Reconstructed public park fixtures that were damaged by the tornado, including playgrounds, pavilions, and tennis courts at Reservoir Park, and upgrading Rock Creek Trail and park amenities.

These projects not only restore essential facilities but incorporate more resilient designs to reduce future storm and wind damage.

3.2.3 Grant-Backed Generator & Safe Room Projects

The City Board authorized the use of FEMA Hazard Mitigation Grant Program funds to enhance emergency preparedness infrastructure by:

²⁸ (Hennigan, Little Rock officials identify ward-specific streets, drainage projects, 2023)

²⁹ (Frank Scott, 2025)

- Purchasing emergency generators for the IT Department,³⁰ ensuring continuity of city communications during power outages; and for Fire Station 9 to support emergency operations during power outages.³¹
- Installing tornado safe rooms at the Dunbar Community Center and the Ottenheimer Therapeutic Recreation Center to provide shelter for vulnerable populations during severe wind events.³²

3.2.4 Ongoing Stormwater Management & Compliance

The City's Public Works Department continues to actively operate its Stormwater Quality Management Program, fulfilling MS4 permit obligations. Annual monitoring, industrial inspections, and pollutant control programs are reported through yearly submissions to the State of Arkansas' Department of Environmental Quality.³³ These protective measures help prevent runoff-related hazards during heavy rainfall.

The actions listed above demonstrate the City's ongoing efforts and commitment to mitigating hazards like severe storms, flooding, and tornadoes. The City is combining infrastructure investment, regulatory compliance, and grant funding to continue its pursuit of the CHMP's mitigation goals.

3.3 Risk Analysis

Per the Pulaski County Hazard Mitigation Plan, the City of Little Rock's communities are likely to face several natural hazards. A Hazard Identification and Risk Assessment was conducted at the County level in 2021 and published in the CHMP, highlighting these identified hazards with profiles to showcase the threat they pose to residents. The Assessment profiled Hazard Events during the CHMP update period of January 1, 2014 through December 31, 2019. The table below shows the number of events that occurred during the update period.

Hazard	Event Occurrence
Dam Failure	None
Drought	393 events reported
Earthquake	None
Extreme Heat	1 event reported
Flood	12 flood and 73 flash flood events
Thunderstorm	137 events
Tornado	8 events
Wildfire	103 events
Winter Storm	3 events

³⁰ (City of Little Rock, Arkansas Board, 2021)

³¹ (City of Little Rock, Arkansas Board, 2025)

³² (Office of the City Manager Little Rock, Arkansas, 2017)

³³ (City of Little Rock, 2025)

3.3.1 Dam Failure

The CHMP uses the Arkansas Natural Resource Commission's (ANRC) definition of low hazard, significant hazard, and high hazard dams. These definitions do not reflect the physical conditions of a dam but describe the areas downstream from a dam which would be impacted should it fail.

- Low Hazard Dam – No loss of life and minimal economic loss are expected. (No significant structures, pastures, woodland, or largely undeveloped land); less than \$ 100,000.
- Significant Hazard Dam – Loss of life is possible but not expected. Economic loss would be appreciable. (Significant structures, industrial, or commercial development, or cropland); \$100,000 to \$500,000.
- High Hazard Dam – Loss of life is expected, and economic damage would be excessive. (Extensive public, industrial, commercial, or agricultural development); over \$500,000.

According to the CHMP's Risk Assessment, the City of Little Rock is at Moderate Risk from a dam failure event. Of the City's 24 dams, eight are classified as high hazard class dams: Broadmoor Lake Dam, Foreman Lake Dam, Jackson Reservoir Dam, Sprick Lake Dam, Spring Valley Lake No. 1 Dam, Twin Lakes Dam A, Twin Lakes Dam B, and Wingate Lake Dam. There are three high hazard class dams which hold enough water volume to flood substantial acreages of land in the event of failure: Jackson Reservoir Dam, Twin Lakes Dam A, and Spring Valley Lake No. 1.

3.3.2 Drought and Extreme Heat

The CHMP's Risk Assessment found that 393 drought events and 1 extreme heat event over 100°F occurred during the five-year update period. As a dense population center reliant on surface water for public usage, the City is vulnerable to the effects of a prolonged heat event and water shortage. Based on previous drought occurrences, the CHMP determined there is a 48% chance of a drought event in any given year, with the City expected to experience a drought rated between D0 and D3 in any given year.³⁴ Extended periods of heat can cause public health concerns with vulnerable populations, water supply stress, fire risk amplification, and infrastructure strain due to heat-related equipment failure. While a drought and extreme heat has yet to severely disrupt the functionality of the City's infrastructure portfolio, the CHMP notes that heat advisories and drought conditions are becoming more frequent and should be prepared for.

3.3.3 Earthquake

The CHMP's Risk Assessment determined that a major earthquake event is extremely unlikely to occur in the near future. However, as Little Rock lies within the Moderate to Weak Zone of the New Madrid Seismic Map, an event remains possible though chances are incredibly low.

³⁴ Based on the U.S. Drought Monitor classification that uses four categories of drought, from D1—the least intense—to D4 to identify areas in drought.

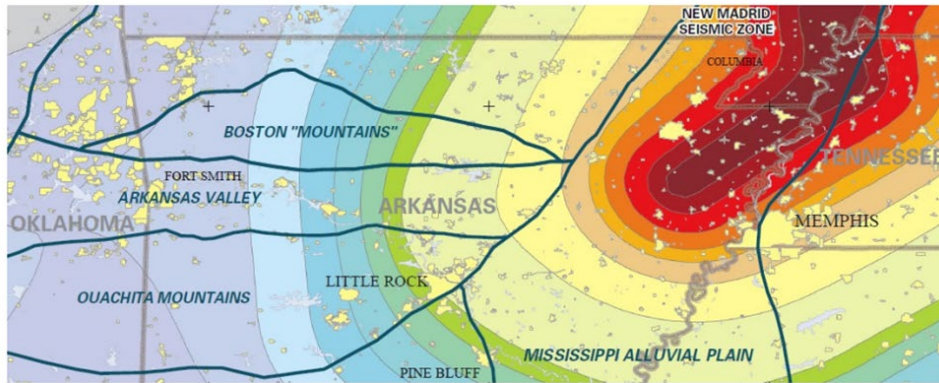


Figure 5. New Madrid Seismic Map

3.3.4 Flood

The City of Little Rock is located within the Lower Arkansas Maumelle Watershed and considered at severe risk for flooding due to a variety of factors. Due to its position in the watershed and south of the Arkansas River, the City is exposed to multiple types of flooding, including riverine flooding from the Arkansas River, flash flooding from intense rainfall, and localized flooding due to aging and undersized stormwater infrastructure. According to the CHMP, there are approximately 573 buildings located in the FEMA-designated Special Flood Hazard Areas, the City faces substantial property and infrastructure risk from flooding. The Arkansas River flood in May 2019 caused widespread damage and highlighted the limitations of the City's protective infrastructure. These impacts are compounded in disadvantaged neighborhoods that often lack flood insurance and resources for recovery. As the CHMP shows an increase in severe rainfall events, it is anticipated that there will be an increase in intensity and frequency of rainfall events, increasing the risk of flooding.

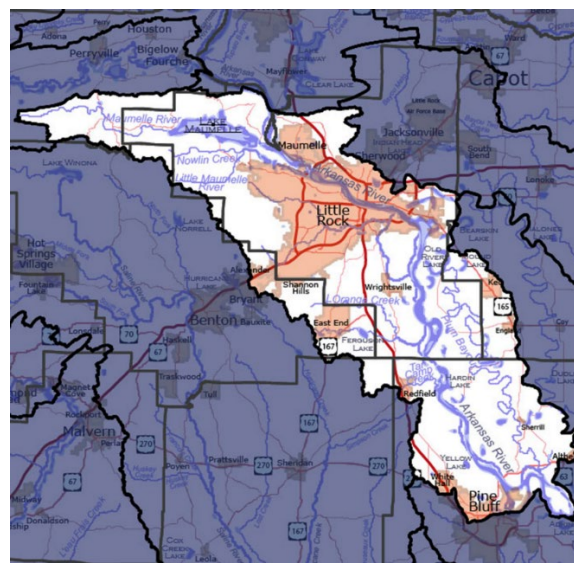


Figure 6. Lower Arkansas Maumelle Watershed

3.3.5 Thunderstorm

Thunderstorms represent a frequent and moderately severe hazard for the City, often accompanied by damaging winds, hail, and lightning. During the CHMP update period, Pulaski County experienced 137 recorded thunderstorm events, many of which directly impacted Little Rock's densely developed areas. These storms can cause widespread power outages, downed trees, damaged roofs, and disrupted transportation systems. While common, the impacts of thunderstorms can be particularly threatening in urban areas with high population density and critical infrastructure, especially if they bring heavy rainfall. The City's infrastructure can be hardened to minimize the likely impacts of consistent storms over the year.

3.3.6 Tornado

Tornadoes pose a significant and unpredictable threat to the City of Little Rock, with the potential to cause widespread destruction in a matter of minutes. While tornadoes are less frequent than other hazards, their intensity and impact can be devastating. During the CHMP update period, Pulaski County recorded eight tornado events, with further occurring after the update period such as DR-4698's event. The City's location within the Central Arkansas region, known for regular tornado events, places it at continued risk. The CHMP notes that as there is no defined geographic hazard boundary for a tornado, all people and property within the County, including those in Little Rock, are exposed to tornado damage risk. The City's residential neighborhoods, schools, commercial corridors, and public facilities are all vulnerable to sudden tornado strikes. The City's dense development and older housing stock increases the risk of structural damage and personal injury during high-wind events. In addition to physical destruction, tornadoes often result in power outages, blocked roadways, and disrupted emergency services. The presence of the City's critical facilities such as hospitals, schools, and government offices in tornado-prone zones increases the need to harden the City's infrastructure against a tornado. Little Rock maintains an outdoor warning siren network and emergency communications system, highlighting its focus on making early warning and public readiness towards tornadoes essential.

3.3.7 Wildfire

Wildfires present a moderate but growing risk to the City, particularly in areas where urban development meets forested or undeveloped land. While the city does not have historically large-scale wildfires, it has experienced increasing exposure due to drought conditions and higher temperatures. During the CHMP update period, Pulaski County recorded 103 wildfire incidents, with many occurring in or near the wooded area of western Little Rock. These zones combine dense forest with growing residential neighbors, creating conditions where fire can spread quickly to residents, homes, and infrastructure. Smoke from these wildfires can also impact air quality, posing a health risk to the entirety of the City, especially vulnerable populations.

3.3.8 Winter Storm

Although less frequent than other weather events, winter storms have caused significant challenges in recent years due to the City's limited snow and ice infrastructure. During the CHMP update period,

Pulaski County experienced three notable winter storms, each of which impacted road conditions, utility service, and public safety. In a region where prolonged freezing temperatures are uncommon, light snowfall or icing can lead to hazardous driving conditions, particularly on bridges. While the City has improved its preparedness with salt and sand stockpiles, the irregular occurrence of winter storms makes it difficult to predict their severity and duration. The City's infrastructure requires further investment in severe weather resilience to prepare for a winter storm event.

3.4 Mitigation Priorities

The City aims to focus CDBG-DR funding on hardening its infrastructure and housing stock to likely hazards. Per the CHMP's Risk Assessment, Little Rock can meet its mitigation goals by prioritizing actions that reduce vulnerability to hazards such as upgrading drainage infrastructure, introducing additional protections to public infrastructure, managing development in high-risk areas, and integrating hazard data into land use and emergency planning efforts. As Little Rock faces an increase in the severity and frequency of severe storms, flooding, and tornadoes, the hardening of the City's infrastructure and housing stock is imperative to mitigating the future impacts of these natural hazards.

Through the CHMP, Pulaski County and the City of Little Rock have identified priority projects such as expanding the City's drainage system to prevent flash flooding, elevating properties in repetitive loss areas, and improving infrastructure near high-risk flood and wind zones. These investments aim to reduce the repetitive loss of roadways and public spaces during severe weather events, to minimize the damage to residential structures and public facilities, and to ensure the continuity of critical infrastructure.

3.5 Summary of Mitigation Needs Assessment

Due to its location south of the Arkansas River and east of the Ouachita Mountains, with an increasing frequency of severe storms with high-wind and rainfall, the City of Little Rock has focused its mitigation efforts on building resilience into communities and infrastructure while increasing the capacity of their emergency services to respond to an event.

These efforts have led to targeted steps to strengthen resilience against natural hazards. The City has launched dozens of ward-specific drainage and street improvement projects, allocating millions toward reducing flash flooding and improving stormwater infrastructure in vulnerable neighborhoods. In response to DR-4698, the City began rebuilding critical facilities such as Fire Station 9 and incorporating more resilient construction standards. It also installed new emergency generators at facilities to ensure operational continuity during power outages and partnered with FEMA to install tornado safe rooms at two community centers to provide secure shelter during severe wind events.

The City has pursued multiple projects to mitigate the impacts of likely hazards such as severe storms, flooding, and tornadoes. Despite the progress noted in previous mitigation efforts, the City must continue preparing for heavy rainfall and high-wind events by funding mitigation activities that

harden the critical infrastructure, public facilities, and housing stock of Little Rock to hold up against these events and provide safe haven to its residents during them.

4.0 Connection Between Proposed Programs & Projects and Unmet Needs & Mitigation Needs

4.1 Allocation and Award Caps

The City of Little Rock is the lead agency and responsible entity for administering \$20,895,000 in CDBG-DR funds allocated for the March 31, 2023 tornado to address unmet needs will be allocated to basic program categories displayed in the table below. Any CDBG-DR program Income generated will need to be used before drawing CDBG-DR Entitlement funds. Only 5% of the program income received will be eligible for administration.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD Identified MID Areas	Estimated % to LMI
Administration	\$1,044,750	5%			
Planning	\$200,000	1%	0%		
Housing	\$12,003,250	58%	0%	100%	73%
Infrastructure	\$2,500,000	12%	0%	100%	50%
Mitigation Set-Aside	\$3,147,000	15%	100%	100%	50%
Economic Revitalization	\$1,500,000	7%	0%	100%	80%
Public Services	\$500,000	2%	0%	100%	100%
Total	\$20,895,000	100%	100%	100%	75%

4.1.1 Funding Criteria

The City of Little Rock will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards, or to reasonably accommodate a person with disabilities, and to further advance an impactful and efficient recovery, in accordance with 2 CFR 200 -Cost principles. The city may make exceptions to program policy, at its discretion. Specific guidance regarding policy exceptions will be outlined in program policies and procedures, as applicable.

In accordance with March 31, 2025, HUD Memorandum 25-03 that revises additional sections of the Universal Notice (90 FR 1754), pursuant to 2 CFR Part 200 and Executive Order 14218 (90 FR 10581), Little Rock ensures that no federal public benefit is provided to any individual who is an ineligible alien, defined as someone who has entered the United States illegally or is otherwise unlawfully present.

4.1.2 Ineligible Activities

Ineligible Activities in CDBG–DR Any activity that is not authorized under Section 105(a) of the HCDA (24 U.S.C. 5305(a)) is ineligible to be assisted with CDBG–DR funds, unless explicitly allowed by waiver and alternative requirement in the Universal Notice. CDBG–DR funds cannot be used as compensation to beneficiaries and cannot be used to force homeowners to pay off their remaining mortgage.

Duplication of benefits (DOB) is an ineligible activity. A duplication occurs when a person, household, business, or other entity receives disaster assistance from multiple sources for the same recovery purpose, and the total assistance received for that purpose is more than the total need. The amount of the DOB is the amount received in excess of the total need for the same purpose. When the total need for eligible activities is more than total assistance for the same purpose, the difference between these amounts is an “unmet need.” Grantees must limit the awarding of CDBG–DR assistance to unmet needs for eligible activities to prevent a DOB. We rely on HUD resources. The historical data from HUD, SBA and FEMA help avoid/ eliminate duplication of benefits.

4.1.3 Internal Controls

The City of Little Rock looks forward to serving those affected by the March 31, 2023, tornado disaster. We are a responsive team with commitment to quality grant service. We maintain quality output by maintaining a consistent internal control system. We have two staff that are responsible for sample file audits. This internal process allows us to ensure compliance. In addition, we provide space for CDBG-DR Complaints on our webpage. The CDBG-DR webpage is the first point of contact for any questions, misunderstanding or complaints. Our website contains information about every phase of the CBDG-DR process, action plan, application process, budget and contact information. We will respond within 48 hours. In addition, any recipient can also contact HUD directly.

4.1.4 Distribution and Selection

Funding distribution and selection will be prioritized based on special population; low-income, elderly and disabled recipients. Then, the selection will access the following categories in the order ranking. 1) Totally destroyed property, 2) Major damages, 3) Minor damages and 4) affected areas within the HUD-identified MID areas. The Unmet needs survey was presented on May 08, 2025, during our first public meeting. The survey was made public on the CBDG-DR webpage.

Distribution of Funds

The City of Little Rock will distribute CDBG-DR funds through direct implementation. City staff along with contractors and subrecipients will administer the grant funds.

Subrecipient Criteria

The criteria used to allocate and award Community Development Block Grant Disaster Recovery (CDBG-DR) funds to subrecipients are based on federal requirements set by the U.S. Department of Housing and Urban Development (HUD). Subrecipients must be eligible entities such as non-profits, local governments, or CHDO'S, or public housing authorities. Entities must demonstrate the organizational, financial, and administrative capacity to manage federal funds. Subrecipient projects must meet at least one of HUD's national objectives: Benefit to low- and moderate-income (LMI) persons or meet an urgent need. Activities must address unmet needs in housing, infrastructure, economic debris removal, or mitigation. Priority may be given to "shovel-ready"

projects that can quickly begin and complete within required timelines. Projects must demonstrate reasonable costs in line with market rates. Subrecipients must have: Strong internal controls, not disbarred in SAM.gov and have systems for financial and programmatic reporting Risk assessments will be conducted to determine level of oversight required.

4.2 Environmental Review

The City of Little Rock will be the responsible Entity by assuming authority for the making and completion of the environmental review per 24 CFR 58. We will meet the applicable environmental requirements, listed under 24 CFR Part 58, before the use or commitment of funds for each activity. After City of Little Rock as the Responsible Entity (RE), (1) completes environmental review(s) pursuant to 24 CFR Part 58 and receives from HUD an approved Request for Release of Funds (RROF) and certification (as applicable); or (2) adopts another Federal agency's environmental review, approval, or permits and receives from HUD an approved RROF and certification (as applicable), we may draw down funds.

4.3 Program Details

Eligible Cost Category		Budget	% of CDBG-DR Allocation	Estimated % to HUD Identified MID Areas	Estimated % to LMI	Estimated % Mitigation Set-Aside
Administration		\$1,044,750	5%			
Planning		\$200,000	1%			0%
Housing	New Construction	\$6,500,000	31%	100%	75%	0%
	Homeowner Rehabilitation/Reconstruction Program	\$3,503,250	17%	100%	75%	0%
	Housing Recovery Assistance Program	\$1,000,000	5%	100%	60%	0%
	Homebuyer Assistance Program	\$1,000,000	5%	100%	80%	0%
Infrastructure	Park Revitalization	\$1,000,000	5%	100%	50%	0%
	Debris Removal	\$1,500,000	7%	100%	50%	0%
Mitigation Set-Aside		\$3,147,000	15%	100%	50%	100%
Economic Revitalization		\$1,500,000	7%	100%	80%	0%
Public Services		\$500,000	2%	100%	100%	0%
Total		\$20,895,000	100%	100%	75%	15%

4.3.1 Administration

Little Rock will allocate \$1,044,750 of the total CDBG-DR award for administrative costs associated with the life of the grant. This represents the maximum amount permissible for administrative costs per the CDBG-DR appropriation language of Public Law 118-158 and HUD's requirements under the Universal Notice. Little Rock advises HUD that it may seek to recover pre-award and/or pre-application costs related to administrative expenses consistent with the guidance provided by Section III.B.14 of the Universal Notice. Such costs may be incurred back to the date of the presidential disaster declaration date (date of declaration for DR-4270-VT).

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation
Administration	\$1,044,750	5%
Total	\$1,044,750	5%

4.3.2 Planning

Little Rock will allocate \$200,000 of the total CDBG-DR award for costs associated with Planning Activities. Little Rock's goal is to provide the maximum possible amount for recovery activities given the discrepancy between estimated unmet needs and the CDBG-DR award.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation
Planning	\$200,000	1%
Total	\$200,000	1%

4.3.3 Housing Programs

The 2023 storm in Little Rock, AR caused extensive damage to housing in the MID areas, greatly reducing the quality and safety of much of the impacted area's housing stock. To address damage to housing, we have created Housing Repair Program (HRP) for eligible households in the applicable 2023 storm impacted areas whose home sustained damage from the storm(s). LMI households will be prioritized. This may include single family homes and multi-family housing.

Decent, safe, and sanitary housing is crucial to human safety and survival, and City of Little Rock recognizes that LMI households face particular difficulty recovering from the impacts of natural disasters. Through the HRP, City of Little Rock aims to address unmet housing needs, increase resilience, and protect human life.

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
New Construction	\$6,500,000	75%
Homeowner Rehabilitation/Reconstruction Program	\$3,503,250	75%
Housing Recovery Assistance Program	\$1,000,000	60%
Homebuyer Assistance Program	\$1,000,000	80%
Housing Programs Total	\$12,003,250	73%

Program Title: Housing Program

City of Little Rock proposes the following housing assistance activities under this program:

- Rehabilitation, reconstruction or replacement of housing units (including single-family, small rental, or multi-family housing) damaged by a qualifying storm, which may include bringing the home into code compliance, and the incorporation of mitigation measures, including elevation, to help protect against future storm impacts.
- Temporary housing assistance based on individual tenant/homeowner needs and their participation in the HRP.

Eligible Activity(ies): Construction of New Housing, Reconstruction of Existing Housing, Rehabilitation of Existing Housing, Homeownership Assistance, Interim Mortgage Assistance, Rental Assistance

National Objective: The national objective of the HRP is benefit to LMI persons or Urgent Need (meeting a need having a particular urgency).

When using the Urgent Need National Objective, City of Little Rock must provide justification that certifies the urgency of the condition. City of Little Rock must document that the project is urgent because of an existing condition that poses a serious and immediate threat to the health or welfare of the community and indicate that no other financial resources are available.

Lead Agency and Distribution Model: City of Little Rock will manage and complete the construction process for the rehabilitation, reconstruction or replacement of damaged homes on behalf of eligible applicants. With the assistance of staff and vendors, the City will work will bid out projects to qualified contractors. The lowest responsible bidder will be assigned to repair, reconstruct or replace damaged properties. Applicants will not select their own contractors. The program will pay contractors directly and no funds will be paid to homeowners. The City will review Small Business Assistance data to ensure there is not a duplication of benefits.

Eligible Geographic Areas: Projects must be in the HUD-Identified MID area.

Other Eligibility Criteria:

The HRP will serve primary resident homeowners and owners of rental properties in HUD and State-identified MID counties. The following additional eligibility criteria apply:

- Projects must demonstrate tie-back to a qualifying 2023 storm.
- Projects must not duplicate benefits.
- Projects must be for eligible structures, as determined by the program including, but not limited to, single family residences, duplexes, condominiums and mobile homes/manufactured housing units.
- Household income must be at or below 150% AMI.*

**This is subject to HUD approval of the LMI waiver.*

Program Tieback to Disaster/Unmet Needs: All housing activities will address unmet housing needs in the applicable MID areas and will ensure that all participants in the program can demonstrate that damage to the home can be tied back to damage from the qualifying 2023 storm.

Program Definition of Second Home/Eligibility: A second home is defined in the Universal Notice as a home that is not the primary residence of the owner, a tenant or any occupant at the time of the disaster or at the time of application for CDBG-DR assistance. Second homes, vacation residences, and short-term, seasonal, and vacation rental properties are not eligible for assistance under the HRP.

The HRP will require the applicant to be the primary resident homeowner or property owner of the rental property at the time the applicable qualifying storm(s) made landfall. HUD's regulations, regarding the use of funding for recovery from the 2023 storm, state an alternative requirement for housing rehabilitation which prohibits housing rehabilitation assistance for second homes. Properties that served as second homes at the time of the disaster, or following the storm, are not eligible for rehabilitation assistance or housing incentives.

Applicants who purchased or moved into the damaged property after the specified storm(s) are not eligible for assistance under this program.

City of Little Rock will verify a primary residence using a variety of documentation including, but not limited to, property tax records, utility statements, FEMA award letters and homeowners' insurance claim documentation.

Flood Insurance: City of Little Rock may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has failed to satisfy Federal requirements to obtain and maintain flood insurance. If an applicant previously received federal disaster relief assistance which required the recipient to maintain flood insurance, and the applicant did not maintain such insurance, the applicant is not eligible for assistance through the HRP

Maximum Amount of Assistance Per Beneficiary: The maximum assistance for HRP is \$350,000 per household.

Program maximum assistance may also be increased where necessary and on a case-by-case basis to comply with federal and State accessibility standards or to reasonably accommodate a person with a disability. The maximum assistance will be further detailed in the HRRP guidelines

Maximum Income of Beneficiary: Household income must be at or below 150% AMI*

**This is subject to HUD approval of the LMI waiver.*

Minimizing Displacement

The City of Little Rock plans to minimize displacement of persons and assist those displaced as a result of implementing a project with CDBG-DR funds. Should any projects cause displacement, City of Little Rock will follow the URA (49 CFR Part 24), as applicable, to ensure tenants are relocated to decent, safe and sanitary locations.

Temporary Housing Assistance Benefit

City of Little Rock recognizes that some HRP beneficiaries, particularly LMI households and those with vulnerable household members, may face financial challenges caused by the cost of interim housing that may be necessary during the repair or reconstruction process. To avoid displacement and homelessness of HRP beneficiaries, City of Little Rock has decided to provide temporary rental assistance for HRP homeowner applicants who are experiencing displacement for an extensive period of time due to HRP activities and are experiencing financial hardship due to, or exacerbated by, the cost of interim housing. This will be on a case-by-case basis if funding allows. Clients will not receive any direct payment(s) for temporary housing assistance. Direct payments will be made by the Program to the qualifying hotel provider. Eligibility and additional information will be included in the HRP guidelines.

The Housing Recovery Assistance Program allows eligible homeowners and rentals who have completed repairs or moved to lodging using personal resources to recover eligible expenses.

Finally, the Homebuyer Assistance Program is designed to help low-to middle-income first-time homebuyers and current renters transition to homeownership, expanding housing stability and affordability in the long term.

Reducing Barriers for Assistance: Recognizing that the \$3,503,250 allocated to HRP will likely not address all needs, LMI populations will be prioritized, with the greatest prioritization for households with incomes less than 80% of AMI and within a HUD MID area. Households with an income at 120% -150 of AMI will be eligible for this program. The City will utilize the most recent HUD income limits available when determining a household's income and eligibility.

City of Little Rock will use our internal communications and marketing team to ensure all households have opportunity and support to complete a pre-application survey and will provide additional assistance to those invited to formally apply. The application will be made available on our CDBG-DR webpage and advertised through our City's website, press releases, public service announcements, and social media pages.

In order to ensure the most vulnerable populations are served first, City of Little Rock will utilize a pre- application survey which will be made available to any residents seeking information regarding HRP assistance. Information on completing the home repair assistance questionnaire may be found at <https://www.littlerock.gov/city-administration/city-departments/housing-and-neighborhood/community-development-block-grant-disaster-recovery/> Accuracy of all information provided by potential applicants through the home repair assistance questionnaire will be verified by City of Little Rock following formal application. In addition to outreach strategies, the City of Little Rock will also be conducting outreach to the impacted areas by advertising the questionnaire. All applicants will be placed on a waitlist and work will be completed by prioritization and chronological order.

City of Little Rock will track and project total obligation of grant funds for each proposed activity. As the projected grant agreement total value for any activity approaches full obligation, City of Little Rock will analyze the remaining potential eligible applicant pipeline to determine the amount of remaining unmet need for prioritized applicants and the remaining balance of funds available to serve those applicants. City of Little Rock may choose to adjust the percentage of funding or re-

allocate additional funding from other programs with less production to maximize assistance for prioritized eligible applicants seeking assistance.

4.3.4 Infrastructure Programs

The City of Little Rock proposes implementing bridge and culvert improvements or replacement, water/sewer infrastructure, and road rebuilding or relocation. Within these activities, Little Rock will address several key priorities as stated by HUD in the Universal Notice.

Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Park Revitalization	\$1,000,000	50%
Debris Removal	\$1,500,000	50%
Infrastructure Program Total:	\$2,500,000	50%

Program Title: Infrastructure

The 2023 tornado in Little Rock, AR affected many communities' infrastructure systems such as damaging roadways, water systems, and energy services. City of Little Rock is allocating \$2,500,000 to fund infrastructure restoration and improvement projects in communities impacted by the 2023 tornado. Funding will be dispersed to impacted communities through a competitive application cycle with priority given to projects that can demonstrate benefit to LMI populations.

Eligible Activity(ies): Eligible activities within this program may include, but are not limited to the following:

- Restoration or improvements of infrastructure damaged by the qualifying 2023 tornado (such as water and sewer facilities, streets, removal of debris, drainage, bridges, parks, etc.).
- Demolition and rehabilitation of publicly- or privately-owned commercial or industrial buildings.
- Renourishment of protective coastal dunes systems and state beaches.
- Repairs to damaged buildings that are essential to the health, safety and welfare of a community when repairs to these buildings constitute an urgent need (this may include police stations, fire stations, parks and recreational centers, community and senior centers, hospitals, clinics, homeless shelters, schools and educational facilities, and other public properties, including properties serving as emergency shelters).
- Repairs to water lines and systems, sewer lines and systems, drainage and flood mitigation systems.
- Natural or green infrastructure.
- Communications infrastructure
- Assistance to buildings for the general conduct of government as the non-federal match.
- Acquisition with or without relocation assistance.

The infrastructure program will allow the City of Little Rock to harden critical buildings that serve a public safety purpose for local communities. These activities will enable local police, fire, shelters,

local emergency management facilities and other designated critical facilities to better withstand the effects of the previously identified hazard risks.

National Objective: The national objectives of the infrastructure program are benefit to LMI persons or Urgent Need (meeting a need having a particular urgency).

City of Little Rock will first consider LMI as the national objective for infrastructure projects. The Urgent Need National Objective will only be used if the project does not meet LMI benefit but has a particular urgency, including posing a serious and immediate threat to the health or welfare of the community.

Lead Agency and Distribution Model: City of Little Rock will bid out all infrastructure projects through a competitive bidding process managed by the City of Little Rock.

In the development of policies and procedures, cost benefit will be addressed. City of Little Rock acknowledges infrastructure activities may have unintended risks that could potentially affect communities. With this understanding, City of Little Rock will follow guidance provided in the Universal Notice and the AAN to avoid disproportionate impacts on vulnerable populations. Specifics on the requirements of the program will be detailed in the program policies and procedures and program guidelines posted to the City of Little Rock's CDBG-DR webpage at <https://www.littlerock.gov/city-administration/city-departments/housing-and-neighborhood/community-development-block-grant-disaster-recovery/>

Eligible Geographic Areas: Projects must be in the HUD-Identified MID area.

Other Eligibility Criteria: Applicants may pursue a range of eligible activities as allowed under CDBG-DR regulations for this appropriation, provided they are in accordance with City of Little Rock's threshold requirements and the requirements for the applicable activity as outlined in the Federal Register. Applicants will be required to meet HUD regulations, such as those for environmental, DOB, fair housing and others.

Eligible Subrecipients:

Potentially eligible subrecipients for the infrastructure program include local municipalities, state agencies, and other applicants including, but not limited to, non-profits and non-governmental agencies that apply in partnership with their local government agency.

Applicants will select projects or programs to propose to City of Little Rock for funding in accordance with City of Little Rock's thresholds and objectives. These thresholds are:

- Projects must not duplicate benefits.

City of Little Rock will also consider to what extent proposed projects or programs support LMI populations.

Maximum Amount of Assistance Per Beneficiary: Program Maximum Assistance Minimum Award: \$100,000 Maximum Award: \$1,000,000

Maximum Income of Beneficiary: N/A

Program Estimated Begin and End Dates:

- Begin Date: Anticipated within 90 days after execution of the HUD funding agreement.
- End date: Anticipated to be no more than 48 months following program launch.

Reducing Barriers for Assistance: Little Rock is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

4.3.5 Mitigation Set-Aside Program

The Universal Notice defines mitigation activities as “activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.” Activities funded by HUD’s additional 15% allocation for mitigation must meet the definition of mitigation activities and, in addition, must:

- Address the current and future risks identified in the SHMP
- Be considered CDBG-eligible under Title I of the HCDA or pursuant to a waiver or alternative requirement; and
- Meet a national objective

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit	Does this Program have tie back to disaster?
CDBG-DR Mitigation Set Aside Program	\$3,147,000	50%	No
Mitigation Program Total:	\$3,147,000	50%	

Program Title: Mitigation Program

To assess whether a given activity qualifies as mitigation and thus counts toward the 15% mitigation set-aside. The City of Little Rock will consider whether the activity fits the description and definition of mitigation outlined in the Universal Notice. The Universal Notice defines mitigation activities as “activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters.” The IRP meets the definition of mitigation as it will increase the resilience of Little Rock’s infrastructure so that it will be able to withstand the impacts of future wind and flood events and reduce the long-term risk of damage to infrastructure such as roads and bridges. Pursuant to the Universal Notice, City of Little Rock will document how activities meet the definition of mitigation and will report such activities in DRGR so that they can be tracked.

In addition to meeting the definition of mitigation activities, activities funded by HUD’s additional 15% allocation for mitigation must:

- Address the current and future risks identified in the Mitigation Risk Assessment referenced in,
- Be considered an eligible activity
- Meet a national objective.

City of Little Rock and its subrecipients will implement programs that focus on risk reduction for the hazards identified as having the greatest severity in the risk-based mitigation needs assessment.

Unlike recovery activities where grantees must demonstrate that their activities “tie-back” to a qualifying 2023 tornado and address a specific unmet recovery need for which the CDBG–DR funds were appropriated, activities funded by the CDBG–DR mitigation set-aside do not require such a “tie-back.” Instead, grantees must demonstrate that activities funded by the CDBG–DR mitigation set-aside meet the provisions as detailed in “Mitigation Set-Aside Activities” below.

Eligible Activity(ies): Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements; Disposition; Non-Federal Match

National Objective: The national objectives of the mitigation program are benefit to LMI persons or Urgent Need (meeting a need having a particular urgency).

City of Little Rock will first consider LMI as the national objective for infrastructure projects. The Urgent Need National Objective will only be used if the project does not meet LMI benefit but has a particular urgency, including posing a serious and immediate threat to the health or welfare of the community.

Lead Agency and Distribution Model: City of Little Rock will bid out all mitigation projects through a competitive bidding process managed by the City of Little Rock.

In the development of policies and procedures, cost benefit will be addressed. City of Little Rock acknowledges infrastructure activities may have unintended risks that could potentially affect communities. With this understanding, City of Little Rock will follow guidance provided in the Universal Notice and the AAN to avoid disproportionate impacts on vulnerable populations. Specifics on the requirements of the program will be detailed in the program policies and procedures and program guidelines posted to the City of Little Rock’s CDBG-DR webpage at <https://www.littlerock.gov/city-administration/city-departments/housing-and-neighborhood/community-development-block-grant-disaster-recovery/>

Program Description:

How will Program Advance Long-Term Resilience: City of Little Rock recognizes the importance of resiliency against future storms and will rely on City engineers to guard against premature obsolescence of infrastructure and ensure that the construction or rehabilitation of infrastructure will mitigate against future disasters. City of Little Rock will describe the implementation of utilizing these technologies, when applicable, in its program policies and procedures.

How will Program Address Disaster-Related Stormwater Management/Other Systems: Flooding has been identified as one of the most destructive hazards in terms of loss of human life, injury, and property damage. Enhancing the function of natural flood mitigation features such as streams and wetlands to ensure that conveyed water makes it to rivers and other bodies of water is increasingly

important. Stormwater management is also a major issue for inland communities. Funding for implementing flooding mitigation projects is critical to achieving the state’s lifeline objectives. City of Little Rock will encourage vendors to identify and select stormwater infrastructure improvement projects that address remaining unmet needs.

Eligible Geographic Areas: Projects must be in the HUD-Identified MID area.

Other Eligibility Criteria: Applicants may pursue a range of eligible activities as allowed under CDBG-DR regulations for this appropriation, provided they are in accordance with City of Little Rock’s threshold requirements and the requirements for the applicable activity as outlined in the Federal Register. Applicants will be required to meet HUD regulations, such as those for environmental, DOB, fair housing and others.

Eligible Subrecipients:

Potentially eligible subrecipients for the infrastructure program include local municipalities, state agencies, and other applicants including, but not limited to, non-profits and non-governmental agencies that apply in partnership with their local government agency.

Applicants will select projects or programs to propose to City of Little Rock for funding in accordance with City of Little Rock’s thresholds and objectives. These thresholds are:

- Projects must not duplicate benefits.

City of Little Rock will also consider to what extent proposed projects or programs support LMI populations.

Maximum Amount of Assistance Per Beneficiary: Program Maximum Assistance Minimum Award: \$100,000 Maximum Award: \$1,000,000

Maximum Income of Beneficiary: N/A

Reducing Barriers for Assistance: Little Rock is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

4.3.6 Economic Revitalization Program

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Economic Revitalization	\$1,500,000	50%
Total:	\$1,500,000	50%

Program Title: Economic Revitalization

The 2023 tornado in Little Rock, AR affected many businesses were affected. City of Little Rock is allocating \$1,500,000 to support long-term recovery in communities impacted DR-4698, through the strategic use of CDBG-DR funding. The focus is to restore, stabilize, and grow local economies by

assisting businesses, investing in workforce development, and revitalizing commercial corridors impacted by the disaster.

Eligible Activity(ies): Small Business Recovery Grants and Loans, Commercial Façade and Infrastructure Improvements, Workforce Development and Job Training, Technical Assistance and Business Services, Economic Development Planning.

National Objective: The national objectives of the program are benefit to LMI persons or Urgent Need (meeting a need having a particular urgency).

City of Little Rock will first consider LMI as the national objective for infrastructure projects. The Urgent Need National Objective will only be used if the project does not meet LMI benefit but has a particular urgency, including posing a serious and immediate threat to the health or welfare of the community.

All economic revitalization activities will address unmet economic needs in the applicable MID areas.

Lead Agency and Distribution Model: The City of Little Rock will be the responsible entity for this project.

Program Description:

Small Business Recovery Grants and Loans

- Direct financial assistance to small and micro businesses impacted by the disaster.
- Target low-to-moderate income (LMI) entrepreneurs.
- Support minority-, women-, and veteran-owned businesses.

Commercial Façade and Infrastructure Improvements

- Revitalize damaged or underutilized business corridors.
- Improve sidewalks, lighting, signage, accessibility, and utilities.

Workforce Development and Job Training

- Partner with community colleges, unions, and nonprofits.
- Fund training programs aligned with local market demands.
- Prioritize programs that serve LMI individuals and displaced workers.

Technical Assistance and Business Services

- Provide business planning, marketing, and compliance support.
- Offer disaster preparedness and continuity training.

Economic Development Planning

- Conduct market analyses, feasibility studies, and economic development strategies.
- Identify anchor institutions and clusters for long-term investment.

Eligible Geographic Areas: Projects must be in the HUD-Identified MID area.

Other Eligibility Criteria: Applicants may pursue a range of eligible activities as allowed under CDBG-DR regulations for this appropriation, provided they are in accordance with City of Little

Rock's threshold requirements and the requirements for the applicable activity as outlined in the Federal Register. Applicants will be required to meet HUD regulations, such as those for environmental, DOB, fair housing and others. Businesses must be located within the Most Impacted and Distressed (MID) areas as designated by HUD and local authorities. Must be a small business, defined as having 500 or fewer employees. Must have been in operation prior to the date of the disaster. Demonstrate a disaster-related need, such as physical damage, loss of revenue, supply chain disruption, or workforce interruption. Must be able to show how assistance will support job retention or creation, especially for low- and moderate-income (LMI) persons.

Economic Revitalization activities may include:

- Working capital (rent, utilities, payroll).
- Inventory replacement.
- Repairs to damaged commercial property (interior/exterior).
- Equipment and furniture replacement.
- Job training or workforce development programs.
- Technical assistance (e.g., marketing, financial literacy, e-commerce).
- Site improvements and infrastructure in business corridors.

Maximum Amount of Assistance Per Beneficiary: Program Maximum Assistance Minimum Award: \$10,000 Maximum Award: \$50,000

Program Estimated Begin and End Dates: Begin Date: Anticipated within 90 days after execution of the HUD funding agreement. End date: Anticipated to be no more than 48 months following program launch.

Reducing Barriers for Assistance: Little Rock is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

4.3.7 Public Services Program

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Public Services	\$500,000	100%
Total:	\$500,000	100%

Program Title: Public Services

The disaster significantly disrupted essential public services in impacted communities, disproportionately residents, seniors, persons with disabilities, and other vulnerable populations. To address these unmet needs, a portion of the CDBG-DR funds will be allocated to support eligible public services that directly contribute to the recovery and long-term resilience of affected residents. These services will complement infrastructure and housing recovery efforts by addressing immediate and long-term health, safety, and stability needs of the population. The City of Little Rock is allocating \$500,000 in public service.

Eligible Activity(ies): Legal Services, Housing Counseling, Mental Health Services & Counseling, Services to Address Homelessness, Disaster Relief Assistance / Disaster Preparedness Programs.

National Objective: The national objectives of the infrastructure program are benefit to LMI persons or Urgent Need (meeting a need having a particular urgency).

City of Little Rock will first consider LMI as the national objective for infrastructure projects. The Urgent Need National Objective will only be used if the project does not meet LMI benefit but has a particular urgency, including posing a serious and immediate threat to the health or welfare of the community.

Lead Agency and Distribution Model: Public service activities may be carried out directly by the grantee or through qualified subrecipients such as: Nonprofit organizations, Community-based service providers, and Faith-based organizations (non-discriminatory),

Program Description: CDBG-DR Public Service activities will be tailored to recovery needs and may include but are not limited to: Disaster Case Management: Providing individualized support to help households navigate disaster recovery resources, housing assistance, and social services. Legal Services: Supporting access to legal assistance related to housing issues, insurance claims, FEMA appeals, landlord/tenant disputes, and heir property issues. Mental Health and Crisis Counseling: Providing trauma-informed care, mental health services, and referrals for individuals impacted by the disaster. Support for Persons Experiencing Homelessness: Outreach, shelter diversion, and services to prevent homelessness among disaster-affected populations. Food and Nutrition Assistance: Meal delivery programs, mobile pantries, and food distribution services for disaster survivors. Medical and Health Services: Non-duplicative mobile clinics, screenings, and health outreach in affected areas where services were interrupted or lost. Workforce Support Services: Childcare, transportation, and other services that support job access for displaced workers. Services for the Elderly and Persons with Disabilities: In-home support, transportation, and case management to address isolation and mobility issues exacerbated by the disaster.

Eligible Geographic Areas: Projects must be in the HUD-Identified MID area.

Other Eligibility Criteria: Subrecipients must demonstrate capacity to deliver services effectively and in compliance with HUD regulations, enter into a written agreement outlining performance goals, eligible costs, reporting, and compliance requirements, and maintain appropriate records and submit documentation verifying service delivery to eligible beneficiaries.

Program Tieback to Disaster/Unmet Needs: All public service activities will address unmet housing needs in the applicable MID areas and will ensure that all participants in the program can demonstrate that damage to the home can be tied back to damage from the qualifying 2023 storm.

Eligible Recipients:

- Nonprofit organizations
- Community-based service providers
- Faith-based organizations (non-discriminatory)
- Government agencies

Subrecipients must:

- Demonstrate capacity to deliver services effectively and in compliance with HUD regulations.
- Enter into a written agreement outlining performance goals, eligible costs, reporting, and compliance requirements.
- Maintain appropriate records and submit documentation verifying service delivery to eligible beneficiaries.

Maximum Amount of Assistance Per Beneficiary: Program Maximum Assistance Minimum Award: \$20,000 Maximum Award: \$200,000

Program Estimated Begin and End Dates: Begin Date: Anticipated within 90 days after execution of the HUD funding agreement. End date: Anticipated to be no more than 48 months following program launch.

Reducing Barriers for Assistance: Little Rock is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

5.0 General Requirements

5.1 Consultation

During the preparation of this Action Plan, The City of Little Rock consulted with the State of Arkansas. CLR is the lead agency of Continuum of Care in Central Arkansas. City of Little Rock consulted the CoC, Metropolitan Housing Authority (MHA) to ensure the consistency of this plan with redevelopment plans. Applicable tribes will be consulted during the environmental review process for each activity. The City's Planning and Development Department were also consulted during this process. CoC, nonprofits, other organizations, public housing agencies and residents are encouraged to provide input into all aspects of the City's Action Plan. There are numerous opportunities for citizens to contribute information, ideas and opinions about ways to improve our neighborhoods, promote housing affordability and enhance the delivery of public services to local residents will occur.

5.2 Action Plan Amendments

In the case of amendments, the City of Little Rock will follow two alternative citizen participation processes. In the case of a substantial amendment, the procedures detailed above will be followed.

A substantial amendment shall be defined as: a change in program benefit, beneficiary or eligibility criteria, the allocation or reallocation 10 percent or more of the budget, or the addition or deletion of an activity.

For amendments considered to be non-substantial, the City of Little Rock shall notify HUD, but public comment is not required. In the event that two budget reallocations are within 30 days of each other, we will adhere to the substantial amendment requirement. Every amendment, substantial or not, shall be numbered sequentially and posted on the website.

5.3 Publication

A copy of the draft action plan can be found on the City of Little Rock's dedicated CDBG-DR webpage. <https://www.littlerock.gov/city-administration/city-departments/housing-and-neighborhood/community-development-block-grant-disaster-recovery/> . This action plan will be posted for at least 30 days on the webpage for public comment. Any comments can be submitted to CDBGDR@littlerock.gov Once the final submission has been approved by HUD, that document will remain on the CDBG-DR webpage. Residents in the affected areas will be notified in various ways including webpage updates, press releases, social media postings, mailings, and electronic mailings and the Arkansas Democrat Gazette. Hard copies can be found at local libraires in the area as well as Neighborhoods Resource Centers. The City of Little Rock will use these steps to encourage the participation of disaster impacted persons in the MID areas.

The City of Little Rock has held public hearings. The first public hearing was held April 3, 2025 at Agape Church (in disaster area). This location is ADA accessible. The second hearing was held virtually on May 8, 2025. Attendees were able to pose their questions in the chat in real time and ask questions verbally, where City of Little Rock provided answers to all attendees. The third hearing will

be held July 14, 2025 during the public comment period to ensure all residents' communications are captured.

5.4 Public Comments

The City of Little Rock will provide a summary of public comments received for the 2023 Disaster Recovery tornado during the public comment. Once the public comment period has ended, City of Little Rock will update this section with the number of comments received, a summary of the comments and responses to the comments. Comments as received in their original form will be available upon request.

6.0 Appendix

6.1 Certifications, Waiver, and Alternative Requirements

The City of Little Rock, as grantee, makes the following certifications with its action plan:

- a. **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan** – The City certifies that it:
 - (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR 24, as such requirements may be modified by waivers or alternative requirements;
 - (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR 42, and 24 CFR 570, as amended by waivers and alternative requirements.
- b. **Authority of Grantee** - The City certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- c. **Consistency with the Action Plan** - The City certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d. **Citizen Participation** - The City certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- e. **Consultation with Local Governments** - The City certifies that it has consulted with all disaster-affected local governments (including any CDBG-entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- f. **Use of Funds** - The City certifies that it is complying with each of the following criteria:
 - (1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

(2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

(4) Special Assessment. The City will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

- g. **Grant Timeliness** - The City certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- h. **Order of Assistance** - The City certifies that it will comply with the statutory order of assistance listed at Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.
- i. Further, as required by Paragraph 64 of HUD's March 19, 2025, memorandum revising Appendix B of HUD's Universal Notice issued on January 8, 2025, the City hereby provides assurance that it shall comply with the following certifications:
 - a. General Certifications at 24 CFR 91.325(a)(1), (3), and (7)
 - b. Community Development Block Grant Program Certifications at 24 CFR 91.325(b)(5), (6), and (7).

6.2 References

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