CDBG-DR ACTION PLAN

SUBMITTED BY: CITY OF LITTLE ROCK.

DR 4698

















CDBG-DR ACTION PLAN

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Change Log

Version (Date)	Summary of Changes Made

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GENERAL INFORMATION

Grantee Name:	City of Little Rock
Entity Designated to	City of Little Rock
Administer the Funds	
Entity Designated Date Plan	8/1/2025
Submitted:	
Amount of funds allocated in	\$20,895,000.00
the action plan:	
Grantee Contact (Name):	Kevin Howard
Grantee Contact	khoward@littlerock.gov /501-371-6825
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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, 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. 4759, January 8, 2025 (the "Universal Notice"), as amended.¹

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 and tornado of DR-4698. 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 storm caused nearly \$90 million in estimated property damage and at least 56,000 power outages. Community gathering spaces like Reservoir Park and Murray Park suffered extensive damage, with an estimate of over \$5 million in damages to Parks and Recreational Facilities across the City.

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¹ (U.S. Department of Housing and Urban Development, 2025)

The first Tornado Warning for Pulaski County was sent out at 2:03pm CDT on March 31.2 The tornado started at 2:18pm CDT just southwest of Colonel Glenn and continued northeast across Pulaski County, through 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 Shackleford. 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 Murray Park before it crossed over into North Little Rock. This path took the tornado through densely populated areas of Little Rock including Walnut Valley, Napa Valley, Cammack Village, River Ridge, Briarwood, and Shackleford. By passing through the City and its heavily populated neighborhoods, the tornado caused over \$10 million in housing damage. The timely warnings were critical in alerting residents and reducing potential fatalities within the Little Rock community. Figures 1 and 2 below show the path and intensity of the March 31, 2023 tornado.

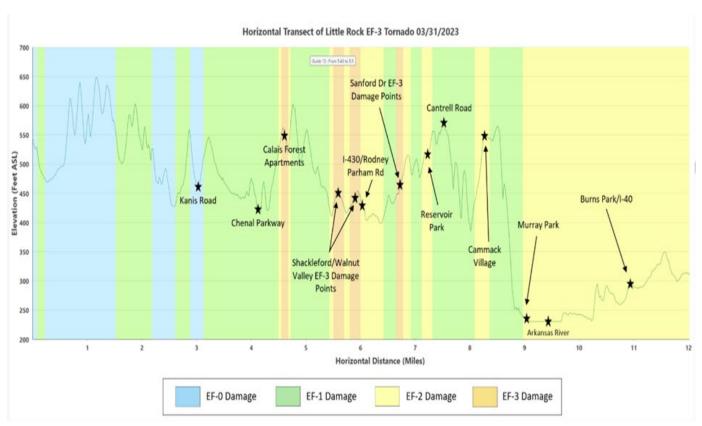


Figure 1 - Horizontal Transect of 3/31/23 Tornado

² (National Weather Service, n.d.)

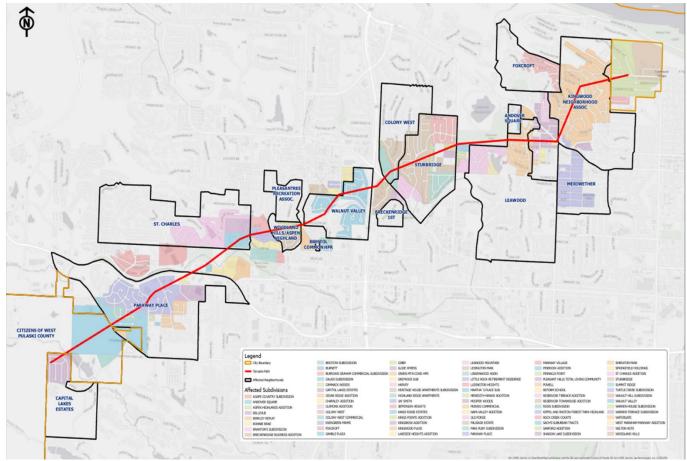


Figure 2 - Tornado Path through Neighborhoods

1.3 Most Impacted and Distressed (MID) Areas

A Most Impacted and Distressed (MID) area is a region identified by either HUD or the State as having experienced severe impacts from a federally declared disaster such as DR-4698. These areas show significant unmet recovery needs across housing, infrastructure, and economic revitalization. Designation as a MID area qualifies a municipality for CDBG-DR funds to ensure communities with the greatest need and highest risk for prolonged recovery challenges are provided with program funds to support long-term recovery. 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 following map includes the entire City of Little Rock as a part of the Federal Disaster Declaration. HUD has hence determined the City of Little Rock, Pulaski County, Arkansas as one of the MID areas for the qualifying disaster, Arkansas-Severe Storms and Tornadoes (DR-4698).

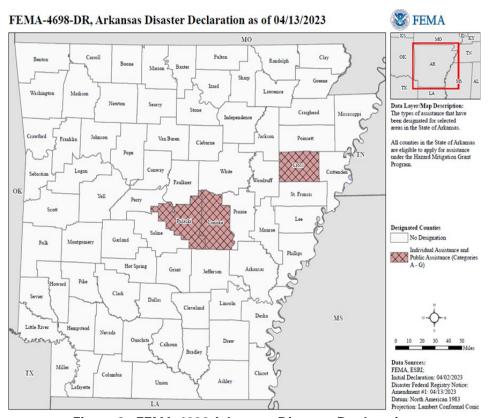


Figure 3 - FEMA-4698 Arkansas Disaster Declaration

As the Unmet Needs Assessment sections below will demonstrate, the City of Little Rock sustained severe damage across its housing stock, infrastructure, and economy due to the tornado. Significant damage occurred to structures such as public facilities, power lines, and homes across the City. Nearly 600 structures received major damage, and damage to forested areas produced a significant volume of organic debris. The destruction brought by the event

³ The HUD definition of "municipality" includes units of local government classified as municipalities, towns, cities, counties, and states that possess the power to perform functions of a municipality.

displaced residents and strained the City's housing stock, particularly in neighborhoods like Walnut Valley and Colony West which were heavily affected. The total estimated property damage from the tornado was \$85,710,000. As there were multiple weather-related events over the course of the week, over \$489 million insurance claims were paid out by December 31, 2023, inclusive of all events during that period.⁴ One area policy holder reported that their Farm Bureau insurance policy amount increased by 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).



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

Infrastructure was critically damaged, with utilities, parks, and public facilities facing substantial disruption and downtime for days to months. For example, Fire Station No. 9's structural damage was detrimental enough to render the facility inoperable and require full reconstruction. Key roadways such as Rodney Parham Road, Cantrell Road, and Shackleford Road were obstructed by debris, which posed a hazard to not only the City's infrastructure but the public health of residents. Major community gathering areas like Reservoir Park and Rock Creek Park took damage to their trails, restrooms, and general facilities that were open to the public. This damage, along with the threat of dangerous debris scattered across the area, led to the necessary and lengthy closures of the parks to allow for recovery and revitalization activities.

⁴ (Hampton, 2024)



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

Economically, dozens of businesses were destroyed or temporarily closed, leading to jobs losses and income disruption. Major commercial corridors such as Colony West Shopping Center and Pavilion in the Park Shopping Center were impacted, with the repair costs totaling over \$3 million. Despite significant initial cleanup and recovery efforts, there is a clear need for additional funding to support the community in restoring housing, rebuilding critical infrastructure, and revitalizing the local economy. Below are pictures of the damaged areas which illustrate the extent of the devastation brought by the tornado. These damages are further explored, documented, and calculated throughout this Action Plan.



Damage to Kroger in Colony West

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.

Table 1. Met and Unmet Needs Overview by Category

Category	Impact	Assistance	Unmet Need	% of Unmet Need
Housing	\$12,697,646.00	\$557,923.31	\$12,139,722.69	18%
Infrastructure	\$15,838,521.03	\$12,832,430.25	\$3,006,090.78	5%
Economic Revitalization	\$335,066,316.48	\$283,095,973.14	\$51,970,343.34	77%
Total	\$363,602,483.51	\$296,486,326.70	\$67,116,156.81	100%

Summary of Unmet Needs and Allocation Distribution

In the aftermath of DR-4698, the City of Little Rock has faced an array of challenges across the housing, infrastructure, and economic sectors. The tornado's path brought it through densely populated neighborhoods of the City and over critical infrastructure, leaving behind empty lots and debris where homes once were. The tornado took down power lines causing a mass power outage, tore apart public facilities across the City like park trails and restrooms, and completely destroyed the homes of residents.

The devastation left in the wake of DR-4698 has left many residents in need of support to restore their homes and livelihoods. Due to damage from the event, many businesses were forced to close, leading to operation disruption and job loss for many residents. While much of these losses have been covered by private insurance, the City's Economic Revitalization program is designed to restore and grow the local economy through business assistance and workforce development.

While economic assets sustained significant damage from the tornado, preliminary assessments, the Unmet Needs Assessment, and FEMA data indicate that businesses impacted have the means to recover through private capital and insurance not included in the data. The Unmet Need for Economic Revitalization is based on insurance data provided by the Arkansas Insurance Department that was collected in the first seven months after the event. Any new insurance claim approvals made after this date are not captured in the analysis, meaning the true extent of economic assistance is likely greater. In contrast, many residents remain displaced or in unstable

housing situations with limited financial ability to rebuild or repair their homes. Addressing the housing crisis exacerbated by the tornado is critical to revitalizing the community and promoting long-term recovery of the local economy. Additionally, housing is a foundational economic building block to communities which are already financially burdened by the impact to wages and opportunity that follow a disaster. By providing a substantial allocation of funds for unmet housing needs, the City of Little Rock is prioritizing housing recovery to promote long-term recovery of the community, its residents, and the local economy that continues to stabilize.

2.2 Background and Process

HUD defines "unmet needs" as those resources necessary to recover from a disaster that are unable 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.

2.2.1 Data Sources and Limitations

This section outlines the data sources analyzed for the UNA, along with the key limitations that may affect the interpretation of the results. The sources cited were used to calculate a dollar value for the unmet need estimate for each category (housing, infrastructure, and economy). There are also additional sources throughout the UNA that provide context and comparison but may not have an associated dollar value for impact. The table below provides an overview of data sources used to quantify the UNA.

Table 2. Data Sources Used in Unmet Needs Assessment

Category	Sources
Housing	1. FEMA Individuals and Households
	Program (IHP)
	2. U.S. Census Bureau American
	Community Survey (ACS)
	3. HUD Comprehensive Housing
	Affordability Strategy (CHAS)
	4. HUD UN AAN Methods for Estimating
	Serious Unmet Needs for Housing
	5. <u>Little Rock/Central Arkansas</u>
	Continuum of Care (CoC)
	6. Metropolitan Housing Alliance
Infrastructure	1. FEMA Public Assistance
	2. SBA Disaster Business Loan

Category	Sources
	3. SBA Economic Injury Disaster Loan
Economic Revitalization	Arkansas Insurance Department
	2. Arkansas Division of Workforce
	Services, Local Area Unemployment
	<u>Statistics</u>

To accurately assess the findings of the UNA and their applicability, it is essential to understand the constraints of the data and its analysis. The City has analyzed a variety of impacts from a wide array of available information sources to calculate unmet need. However, there are several limitations to the analysis:

- SBA Disaster Home Loan data was not available for DR-4698; therefore, the HUD multiplier for damage categories Major-Low, Major-High, and Severe were used to calculate housing unmet need.
- Data on the impact of DR-4698 on affordable housing and the housing portfolio of the Housing Authority of the City of Little Rock were not available to assess the impact of the tornado on subsidized housing.
- Available census data on Little Rock's housing stock included information regarding ownerand- renter-occupied units, and multifamily and single-family units. Data on multifamily units that are owner-occupied is not available in existing data.
- Landlords are presumed to have adequate insurance coverage unless the unit is occupied
 by a renter with income less than the greater of the Federal poverty level or 50 percent of the
 area median income. Units occupied by a tenant with income less than the greater of the
 poverty level or 50 percent of the area median income are used to calculate likely unmet
 needs for affordable rental housing.
- FEMA Public Assistance funding requires a complex application process. Several projects have reported estimated costs that may not match the current information in Grants Portal. The impact calculations for these projects are estimated and subject to change.
- The SBA Disaster Business Loan and the Economic Injury Disaster Loan obtained by the City
 of Little Rock revealed that no business in the City successfully completed the application
 process or received a damage estimate. As such, data from the Arkansas Insurance
 Department was used to estimate the economic cost of DR-4698.
- The Arkansas Insurance Department only collected data on the first seven months after the tornado, up until November 1, 2023. Any insurance claims made after this date are not captured in the analysis, meaning the true extent of economic damage and assistance may both be greater. The analysis assumes that all commercial applicants who were denied claims experienced similar levels of impact to their businesses as those whose claims were approved, but that their insurance policy did not cover that damage.

2.3 Housing

Much like the nationwide housing market, Little Rock faced challenges to an adequate housing supply and affordability prior to DR-4698, which were only exacerbated by the destruction caused by the tornado. The following sections will explore the status of Little Rock's housing stock prior to the tornado and explore how the extreme weather event resulted in an acute need for funding to not only restore housing supply but also ensure accessibility of housing to the balance of Little Rock citizens.

The Housing Unmet Needs Assessment indicates that Little Rock residents not only must navigate the challenges of rebuilding after the March 2023 tornado but also contend with an aging housing stock and a high population of cost-burdened groups of both renters and owners who are particularly vulnerable to the strain of housing costs, rehabilitation efforts, and economic disruptions. In the year after the storm, the unhoused population documented by the Little Rock/Central Arkansas CoC increased by 31.6% from the year prior; funding for the CoC failed to increase commensurately with the demand for homeless resources and shelter beds. While Little Rock's recovery efforts were supplemented by aid from federal and local sources, such as FEMA IHP awards, private insurance policies, and state/local programs, the Housing Unmet Needs Assessment provides insight into the significant amount of aid needed to address the long-term community development and housing needs of the community.

2.3.1 Rental Housing and Owner-Occupied Single Family and Multifamily Housing

Per U.S. Census ACS 2022 1-year estimates, there was approximately 96,847 total housing units across the City, with an occupancy rate of 90.3% and 9.7% vacancy of all housing units. Owner-occupied housing units accounted for 54% of the total housing units; renter-occupied units comprise the remaining 46% of housing units. HUD's Comprehensive Market Analysis for Little Rock metropolitan area indicates that the rental market is tightening, with the rental vacancy rate down to from 10.1% in 2010 to 9.6% in 2021. During HUD's 3-year forecast period, a demand for 3,050 units is expected, with only 1,225 units under construction to satisfy a portion of the demand⁵.

Table 3. Housing Stock by Occupation Status in Little Rock, Arkansas

Total Housing Units	Occupied Housing Units	Vacant Housing Units	Owner- occupied	Renter- occupied	Homeowner Vacancy Rate	Rental Vacancy Rate
96,847	90.3%	9.7%	54%	46%	0.4%	9.4%

Table 4. Total Population in Occupied Housing Units

Total Population	Owner Occupied Population	Renter Occupied Population	Percent Owner Occupied
197,572	118,822	78,750	60.1%

⁵ Comprehensive Housing Market Analysis Little Rock-North Little Rock-Conway, Arkansas, 2023

Rental units represent a much higher proportion of vacancy rates in comparison to homeowner vacancy rates; data indicates that the supply of owner-occupied properties is relatively inelastic when measured against the rental market. Therefore, homeowners who are permanently displaced from their homes face an inflexible housing market with a lack of homes on the market that are available for relocation. This is further exacerbated by the reality that a majority of units in Little Rock are owner-occupied, further accenting the acute need for new construction of housing to meet the needs of the City.

2.3.1.1 Residential Building Profile

The distribution of housing types across units in the City's housing stock indicates a larger proportion of smaller scale housing options, limiting the availability of more affordable multi-family rental units. Lower population density per residential building can serve to extend displacement of households since repairs to low-density housing impacts fewer individuals per repair in comparison to repairing larger multi-family units. 60.9% of housing units in Little Rock were single family units, demonstrating the MID area's heavy reliance on single family domiciles. However, structures with 2+ units, the next largest proportion of properties are those with 20 or more units at 12.6%, 10 to 19 units at 10.5%, and 5 to 9 units at 8.5%. While most of Little Rock's housing stock is concentrated in single unit properties, structures with multiple units trend towards a higher proportion of units per structure.

Table 5. Units in Structure in Little Rock, Arkansas

Total Housing Units	1 Unit	2 Units	3 or 4 Units	5 to 9 Units	10 to 19 Units	20 or More Units	Mobile Homes
96,847	60.9%	2.9%	3.4%	8.5%	10.5%	12.6%	1.2%

2.3.1.2 Aging Housing Stock

Much like the housing stock across the nation, the City of Little Rock faces an aging supply of housing with physical vulnerabilities that increased the impact of damage caused by the tornado to these structures. Of the existing housing stock, 55% of structures were built before 1979, making over half of Little Rock's housing 45 years old or older. For reference, buildings constructed prior to 1980 are at increased risk of containing lead-based paints or asbestos, which represents a long-term threat to health and safety of occupants and increases occupational hazards present to those leading recovery efforts following the destruction from DR-4698, which in turn increases the costs of these services. HUD estimates that 83% of private housing and 86% of public housing built prior to 1980 contains lead-based paint. The table below demonstrates the large proportion of housing in Little Rock that is aging, increasing the susceptibility of structures to health and safety hazards. These structures may have already required maintenance or modern resilience reinforcement to prevent their susceptibility to storm damage incurred by severe weather events.

⁶ Occupational Safety and Health Administration

⁷ Consumer Product Safety Commission

⁸ Environmental Protection Agency, 1998

Such investments are likely to place a strain on the limited financial resources of cost burdened households.

Table 6. Year Structure Built in Little Rock, Arkansas

Total Housing Units	2020 or	Built 2010 to 2019	2000 to	1990 to	1980 to	1970 to	1960 to	1950 to	1940 to	1939 or
96,847	0.6%	10.1%	10.8%	11.0%	12.6%	17.1%	17.7%	8.5%	4.8%	6.9%

2.3.1.3 Households with Housing Problems

Beyond an aging housing stock, housing in Little Rock faces additional problems that are captured by the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS). Utilizing data from the Census Bureau's American Community Survey, HUD documents the number of households with at least one of the following problems:

- 1. Home lacks complete kitchen facilities
- 2. Home lacks complete plumbing facilities
- 3. Household is overcrowded, defined as having more than one person per room of the unit; or
- 4. Household is cost burdened, defined as monthly housing costs, including utilities, exceeding 30% of monthly income.

The acute lack of safe and affordable rental housing is an issue that was only exacerbated by the March 2023 tornado destruction of Little Rocks housing stock. Figures 4 and 5 portray the proportion of households by HUD Area Median Family Income (HAMFI) bracket that has at least 1 of 4 housing problems. Note that more than 50% of households in the lowest two income brackets for both owner- renter-occupied households are burdened with at least one of the listed housing problems, while less than 20% of the top two income brackets respectively for both populations are recorded as having one of the housing problems. This indicates that irrespective of damage and destruction from DR-4698, low-income owner- and renter-occupied households already disproportionately faced with housing problems that were only exacerbated by extreme weather. Furthermore, the "Total" category in the charts demonstrates that renters face housing problems at a higher rate than those living in owner-occupied units.

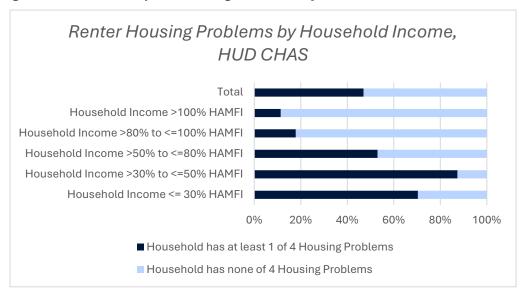
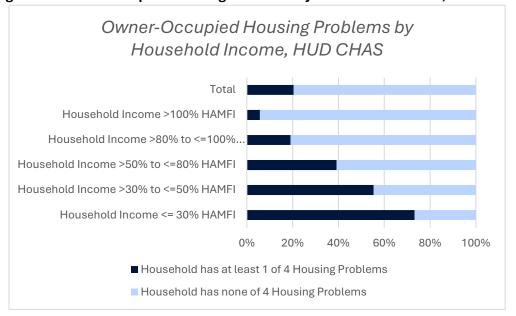


Figure 4. Owner-Occupied Housing Problems by Household Income, HUD CHAS





2.3.1.4 Shortage of Affordable Housing and Housing Cost Burden

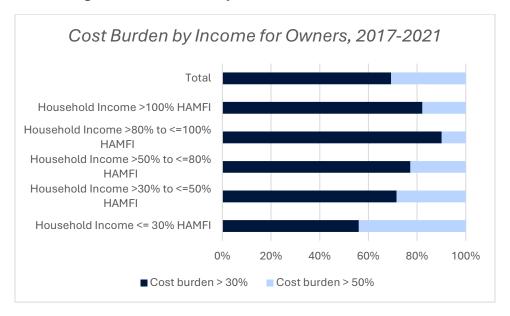
As demonstrated in the prior section, low-income renters are disproportionately impacted by housing problems. This trend is further supported by the following 2017-2021 ACS data, showing that approximately twice as many renters are cost burdened than households who own their domicile. This illustrates how the population of renters in Little Rock are particularly vulnerable to the destruction caused by the extreme weather event, which is exacerbated by the reduction in rental housing stock due to the tornado's destruction. In order to support access to affordable housing for all residents. Little Rock must repair existing housing and build new housing to alleviate an increase in demand and reduction in supply following the disaster.

Table 7. Households with Housing Cost Burden, 2017-2021 ACS

	% of Households Paying 30-49% income on Housing Expenses	% of Households Paying 50% income or more on Housing Expenses	% of Households that are Cost-Burdened
Owner	5,040	3,995	10.6%
Renter	9,155	7,570	19.6%

In line with CHAS data trends captured above, cost burden impacts the lowest income of the renter- and -owner-occupied population in Little Rock. Per Figures 6 and 7 below, households with an income less than 30% of HAMFI have the highest proportion of households with a cost burden of at least 50%, while households with incomes 80% and above of HAMFI experience the lowest proportion with a cost burden of at least 50%. This further illustrates how housing costs in Little Rock disproportionately burden low-income renters and owners due to the lack of affordable housing available in the City, an issue that has become increasingly acute following the tornado. Damage from the tornado represents an additional cost burden to renters and owners that require proactive assistance to aid the community toward recovery.

Figure 6. Cost Burden by Income for Owners, 2017-2021



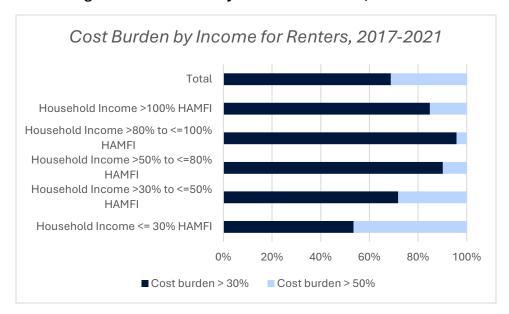


Figure 7. Cost Burden by Income for Renters, 2017-2021

While the poverty rate in Little Rock is 18.5% of the total population, the above data shows that these residents are the most vulnerable to costs incurred after the damage from the tornado.

Table 8. Poverty Status of the Population of Little Rock

Total	At or above poverty	Below Poverty	Percent Below
Population	Level	Level	Poverty Level
197,446	160,837	36,609	

Per HUD statute, Little Rock has committed available funds to benefit low- to moderate-income applicants and residents first and foremost to concentrate recovery efforts on those who are most burdened by the financial impact of the March 2023 storm. While LMI populations will be prioritized, Little Rock will take a holistic approach to housing recovery that ensures the needs of all communities are met to mitigate the long-term impact of the tornado on those impacted.

2.3.2 Interim Housing and Permanent Housing

Interim housing available to those who are housing insecure, as well as permanent affordable housing for low- to- moderate-income households, are important lifelines to Little Rock residents, irrespective of the damage caused by DR-4698. However, following a disaster, the demand for access to housing across a spectrum of need becomes more acute. The following sections explore the state of Little Rocks interim housing and permanent housing in the year preceding and following DR-4698, as well as the permanent affordable housing available via the Housing Authority of the City of Little Rock.

2.3.2.1 Homelessness and Interim Housing (Emergency Shelters, 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. The increase in approximately 31% of the homeless population for Little Rock and the surrounding area is predominantly concentrated in the population of persons in households with at least one adult and one child. In 2023, households with at least one adult and one child represented 39 emergency shelter residents and 8 transitional housing residents. In 2024, households with at least one adult and one child represented 285 emergency shelter residents, and 98 transitional housing residents. This represents an approximately six-fold increase in emergency shelter residents and an approximately 11-fold increase in transitional housing residents for households with one adult and one child in the year following DR-4698. While there was an increase in homelessness rates in Little Rock and the surrounding area between 2023 and 2024, HUD funding to AR-500 Continuum of Care was not raised commensurately. In 2023, AR-500 was awarded \$2,705,820 by HUD; In 2024, they were awarded \$2,705,483, representing a decrease in federal funding of 0.01%.

Table 9. Little Rock/Central Arkansas Continuum of Care Data

	Homeless Households	Homeless Persons	Unsheltered Persons	Transitional Housing	Emergency Shelters	HUD Funding Award
2023	643	773	369	76	198	\$2,705,820
2024	569	1,016	369	40	160	\$2,705,483
Percent Change	-11.5%	+31.4%	0%	-47.4%	-19.2%	-0.01%

One explanation for the increase in homeless people, coupled with a decrease in populations at transition housing and emergency shelters from 2023 to 2024, is the Arkansas Division of Emergency Management (ADEM) management of non-congregate sheltering in hotel rooms for impacted survivors Following the storm, ADEM, in close partnership with the American Red Cross and the Arkansas Department of Human Services, managed temporary housing in hotel rooms for impacted survivors of DR-4698. This program was instrumental in securing safe temporary housing for those who were displaced by the tornado's destruction. At its height, ADEM provided shelter for 1,269 people from 700 households who had lost their homes. As of March 2024, 33 families were still residing in FEMA housing. ¹³

2.3.2.2 Public Housing, HUD Assisted Housing, and Other Types of Affordable Housing

The Housing Authority of the City of Little Rock has 3,185 units of permanent affordable housing, which includes public housing units and housing choice vouchers issued to low-income households for use in the private market. The existing stock of affordable housing offer through the City's Housing Authority represents approximately 3.3% of Little Rock's housing stock overall. While data on the impact of DR-4698 on the stock of affordable in the City of Little Rock is not available, the number of units existing prior to the storm is a small part of the housing stock in

⁹ (U.S. Department of Housing and Urban Development, 2024)

¹⁰ (U.S. Department of Housing and Urban Development, 2023)

¹¹ (U.S. Department of Housing and Urban Development, 2024)

¹² (U.S. Department of Housing and Urban Development, 2025)

¹³ (Arkansas Department of Public Safety, 2024)

comparison to the number of Little Rock households that are cost burdened and in need of subsidized housing.

Table 10. Housing Authority of the City of Little Rock Housing Stock by Unit Type

Public Housing Units	Affordable Units	Market Rate Units	Housing Choice Vouchers	Veterans' Affairs Supportive Housing (VASH) Vouchers
902	200	158	2,083	179

2.3.2.3 Sheltering and Rental Assistance

Table 11 displays the rental assistance given to owners and renters by FEMA following DR-4698. Of the eight ZIP codes that received rental assistance, 72211 received 42.1% of all rental assistance, and 72227 received 50.2% of rental assistance. In total, these two zip codes were awarded over 92% of the total rental assistance provided in Little Rock, demonstrating the concentrated impact of DR-4698 on these areas. ZIP code 72211 houses the Parkway Place neighborhood and 72227 houses the Colony West and Andover Square neighborhoods.

Table 11. FEMA Rental Assistance by ZIP Code

Zip Code	Rental Assistance to Owners	Rental Assistance to Renters	Total Rental Assistance
72204	\$22,142.00	\$6,724.00	\$28,866.00
72205	\$0.00	\$9,606.00	\$9,606.00
72206	\$6,724.00	\$7,744.00	\$14,468.00
72207	\$1,840.00	\$26,694.00	\$28,534.00
72209	\$5,904.00	\$6,440.00	\$12,344.00
72211	\$12,290.00	\$533,488.43	\$545,778.43
72223	\$4,546.00	\$2,415.00	\$6,961.00
72227	\$24,098.00	\$626,537.83	\$650,635.83
Total	\$77,544.00	\$1,219,649.26	\$1,297,193.26

2.3.3 HUD Damage Categories

Of the households inspected by FEMA IHP, approximately 29% of inspected properties were owner occupied and 71% were renter occupied, demonstrating that the tornado had a disproportionate impact on renter-occupied units. Owner-occupied units had 40 cases of damage classified as Major-low or higher, whereas renter-occupied units had 100 cases. Data on renters utilized for calculation of unmet need follows HUD guidance in Appendix A of the Universal Notice that reasons property owner insurance is sufficient to cover damage to rental properties and therefore

only damage to rental units occupied by residents under 50% of AMI are included when applying the HUD multiplier.

Table 12. Number of IHP Registrants with each HUD Damage Category for Little Rock

	Minor (Minor-Low + Minor-High)	Major-Low	Major-High	Severe
Owner Occupied	1,009	27	3	8
Renter Occupied	1,548	29	60	11

In total, there were 140 cases of damage to residences that qualify as Major-Low or higher; these damaged properties represent over 10 million dollars in housing damage in the City of Little Rock alone.

Table 13. MID Area HUD-Multiplied Non-Mobile Home Housing Need

HUD Damage Category	Inspected Registrants	HUD Multiplier	Cost
Severe	21	\$134,503	\$2,824,563
Major-High	83	\$82,582	\$6,854,306
Major-Low	57	\$52,961	\$3,018,777
Total Cost of Housing Loss			\$12,697,646

Of the units inspected, \$563,291.37 in Personal Property Awards, \$102,939.80 in Repair Awards, and \$41,488.96 in Replace Awards were distributed to inspected residences. In total, FEMA IHP awarded \$675,096.15 to residents of the City of Little Rock following the March 2023 tornado.

Table 14. FEMA IHP - Damage and Assistance

HUD Damage Category	Personal Property Award	Repair Award Amount	Replace Award Amount
Severe	\$79,556.58	\$449.14	\$41,000.00
Major-High	\$272,142.11	\$21,521.69	\$0
Major-Low	\$62,284.82	\$80,968.97	\$0
Total by Award	\$413,983.51	\$102,939.80	\$41,000.00
Total Awards			\$557,923.31



Napa Valley Apartment (EF-3)

2.3.4 Summary of Housing Unmet Needs

Table 15. Housing Loss, FEMA IHP Awards, and Total Unmet Need

Total Cost of Housing Loss	Total FEMA IHP Repair/Replace Awards	Total Unmet Need
\$12,697,646	\$557,923.31	\$12,139,722.69

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, indicating a FEMA inspected real property damage of \$8,000 or above for owner-occupied units or personal property damage \$3,500 or above for renter-occupied units.

HUD housing multipliers established in the Universal Notice were used to calculate Major-Low, Major-High, and Severe categories for the tornado disaster type. Per the methodology in Appendix A of the Universal Notice, the tornado multiplier was utilized for Major-low, Major-high, and Severe damage levels in place of matching SBA data with FEMA IHP data, since SBA data for DR-4698 was not provided.

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, 80 as Major-High, and 12 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 IHA data on renter occupied units was filtered to include only households at or below the 2023 50% area median income for Pulaski County.

Table 16. Total Derived Impacts and Unmet Needs for Housing

Damage Level	# of Damaged Structures	Average Real Property Loss	Estimated Total Loss (HUD Multiplier)				
	Owner Occupied						
Major-low	28	\$10,613.99	\$1,482,908.00				
Major-high	3	\$19,014.90	\$247,746.00				
Severe	9	\$106,689.27	\$1,210,527.00				
	Renter Occupied						
Major-low	29		\$1,535,869.00				
Major-high	80		\$6,606,560.00				
Severe	12		\$1,614,036.00				
Total Housing Loss			\$12,697,646.00				
	FEMA payments	to Repair/Replace	\$557,923.31				
	l:	nitial Unmet Need	\$12,139,722.69				

2.4 Infrastructure

Infrastructure across the State of Arkansas faces major challenges to comply with modern standards. According to the American Society of Civil Engineers (ASCE)'s 2025 Infrastructure Report Card, in Arkansas, 4.9% of bridges are rated structurally deficient and193 dams have the potential to be high hazard. Driving on roads in need of repair in the State costs individual drivers \$671 per year in additional repair and maintenance costs. ¹⁴ 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.

DR-4698 exacerbated these challenges. The tornado caused widespread damage to infrastructure, severely impairing or destroying power lines, transformers, gas lines, park amenities, roads, and key public facilities. Trees were also uprooted from the ground, further damaging infrastructure and leaving debris scattered across the City. These impacts led to power outages, road obstruction, and damaged public facilities. Following the event, the City and its partners have prioritized the repair and upgrade of its infrastructure portfolio, seeking to strengthen public facilities and utilities against future severe weather events.

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

¹⁴ (American Society of Civil Engineers, 2025)

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 PAeligible 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. For Categories C through G, the City of Little Rock reached a 75/25% cost share split with the Federal Government. The City of Little Rock is responsible for around \$2.58 million. ¹⁵ The analysis below is largely informed by publicly available FEMA PA data on fully obligated projects, and, where possible, supplemented by additional Grants Portal data for more accurate final cost agreements.

Table 17: FEMA Public Assistance Program

PA Category	# of Damaged Sites	Sum of Approximate Cost	Sum of Federal Share	Unmet Need
A – Debris Removal	10	\$10,665,491.64	\$9,238,558.19	\$1,426,933.45
B - Emergency Measures ¹⁶	16	\$1,720,240.48	\$1,478,407.30	\$241,833.18
C – Roads and Bridges	2	\$106,016.29	\$79,512.22	\$26,504.07
D – Water Control Facilities	2	\$174,002.02	\$130,501.52	\$43,500.50
E – Buildings and Equipment	4	\$1,730,179.2	\$1,297,634.40	\$432,544.80
F – Utilities	2	\$44,137.06	\$33,102.80	\$11,034.26
G – Parks, Recreational Facilities and Other Items	3	\$1,618,694.82	\$1,214,021.12	\$404,673.70
All Categories	39	\$16,058,761.51	\$13,471,737.55	\$2,587,023.96
Total – without B	23	\$14,338,521.03	\$11,993,330.25	\$2,345,190.78

2.4.1.1 Debris Removal

In the immediate aftermath of DR-4698, fallen trees, power poles, and building wreckage littered Little Rock's neighborhoods, roadways, and forest areas. Structural debris halted traffic for a day on major roadways such as Rodney Parham Road, Cantrell Road, Shackleford Road, and

¹⁵ (U.S. Federal Emergency Management Agency, 2025)

¹⁶ 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.

Breckenridge Drive, while debris remained in residential areas for much longer.¹⁷ Some public areas, such as parks, were rendered inaccessible due to the volume of downed trees and debris.¹⁸

The City's Public Works Department began clearing the debris shortly after the event, contracting Disaster Recovery Contractors (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. 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 residents became responsible for all remaining storm debris on private property. At present, the City bears over \$1.4 million in remaining cost share for debris removal.

The City is prioritizing debris removal activities under the Infrastructure program as it is the FEMA PA category with the highest cost share and a priority for the community. Unmet infrastructure need typically only includes FEMA PA Categories C through G—which are considered "Permanent Work"—but the continued presence of debris actively impedes the City's ability to repair other infrastructure. In a public feedback survey, over 60 community members ranked debris removal as a "High Priority". Out of 9 program options, debris removal ranked as the highest priority, over housing recovery assistance and infrastructure investments.

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. Expression Key roadways such as Rodney Parham Road, Cantrell Road, Shackleford Road, and Breckenridge Drive were also obstructed by errant debris carried by the storm. 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. 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 Water Control Facilities

While the FEMA data indicates that some water control facilities in Little Rock experienced minor damage from the tornado, the City's overall water management system remained largely intact. Key infrastructure such as stormwater systems, drainage channels, and water treatment operations did not sustain significant impacts and there was no widespread service disruption reported. The FEMA Category D – Water Control Facilities notes there is \$56,550 in remaining

¹⁷ (National Weather Service, 2024)

¹⁸ (City of Little Rock, Arkansas, 2023)

¹⁹ (City of Little Rock, Arkansas, 2023)

²⁰ (National Weather Service, n.d.)

²¹ (National Weather Service, 2024)

²² (Ringo, 2023)

unmet need. Since the event, the City has continued with routine repairs and maintenance to address this need and ensure long-term functionality of its water control systems.

2.4.1.4 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. To rebuild the station, the City is relying on insurance and FEMA assistance. The FEMA project cost is capped at the predisaster cost of \$4,299,991.25, with the City responsible for \$340,592.81. The City, however, is seeking additional support to rebuild the old two-story station at a higher standard than its predisaster state, with resiliency additions such as a tornado shelter in the basement.²³

2.4.1.5 Utilities

In the immediate aftermath of the tornado, there were 56,000 power outages across the State, as reported by Entergy Arkansas. A large portion of these outages were in Little Rock, where power lines had been damaged by fallen trees and other debris. According to Entergy, more than 1,500 utility poles, 435 transformers and nearly 2,000 spans of wire were damaged or destroyed in the Little Rock, Jacksonville, Sherwood and Wynne areas. ²⁴ By April 4, 2023, Entergy Arkansas had restored 90% of power to customers. To harden the energy system infrastructure against severe weather events, the provider has mobilized a workforce of over 3,000 to upgrade cable wire and install stronger poles to withstand future storm winds and debris. The City has supported the recovery and resiliency efforts through coordination of resources and assistance as needed.

2.4.1.6 Parks, Recreational Facilities, and Other Items

The tornado that struck Little Rock caused massive damage to parks and recreational facilities across the City. Reservoir Park, Rock Creek Park, and Murray Park were all temporarily closed for debris clearing and facility repairs. ²⁵ Amenities across these parks such as playgrounds, ball fields, pavilions, tennis courts, restrooms, and boardwalks were broken or destroyed. While all three parks have reopened to the public, many of the amenities remain broken and unavailable. Certain areas of the parks are also closed to the public until rehabilitation can be conducted..

Reservoir Park experienced a near-total destruction of nearly 60 acres of land, resulting in over \$1.8 million in damage from downed trees and destroyed park amenities. Given the effective decimation of the park, the City used the park as a holding site for storm debris from residential and commercial areas. The initial storm debris and deposited debris have all been cleared. However, many of the trees that were left standing are now also diseased or damaged and will require removal. At present, electrical services and a pavilion have been restored, but many of the park's original amenities such as restrooms, a ballfield, and a playground require repair or reconstruction. ²⁷

²³ (Ellison, 2025)

²⁴ (T&D World, 2023)

²⁵ (Buckner, 2024)

²⁶ (Jacobs, 2024)

²⁷ (Jacobs, 2024)

Rock Creek Park sustained an estimated \$1.5 million in damage and was closed to the public for 17 months.²⁸ The City received a \$839,100 grant from the USDA that was used to replant fallen trees.²⁹

The tornado also caused an approximate \$1 million damage to Murray Park, a spot known for its picnic areas, and the Arkansas River Trail. As with the other two parks, the tornado damaged trees and facilities such as a playground, pavilions, bathrooms, and utilities. The City prioritized the restoration of Murray Park due to its local popularity and the ease of repairs. The park has reopened to the public except for a recreation workout facility which the City has contracted out for rebuilding.³⁰

Table 18. Additional Park Damage Not Covered by FEMA PA

Park	Estimated Cost of Damages	Assistance Provided	LR Cost Share
Rock Creek Park	\$1,500,000	\$839,100	\$660,900
Total	\$1,500,000	\$839,100	\$660,900

2.4.2 Summary of Infrastructure Unmet Need

Following DR-4698, the City of Little Rock's infrastructure portfolio sustained over \$15 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, the devastation of outdoor spaces and parks, 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 \$3 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 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.

Table 19. Summary of Infrastructure Unmet Need

Total Damage	Assistance Provided	Unmet Need
\$14,338,521.03	\$11,993,330.25	\$2,345,190.78
\$1,500,000.00	\$839,100.00	\$660,900.00
\$15,838,521.03	\$12,832,430.25	\$3,006,090.78
	\$14,338,521.03 \$1,500,000.00	Total Damage Provided \$14,338,521.03 \$11,993,330.25 \$1,500,000.00 \$839,100.00

⁽Hampton, 2025)

²⁸ (Christian, 2024)

²⁹ (Buckner, 2024)

^{30 (}Buckner, 2024)

³¹ The damage incurred, assistance received, and City's cost share for Reservoir Park and Murray Park have been left out to avoid duplication with FEMA PA data.

2.5 Economic Revitalization

The City of Little Rock is the economic and commercial center of the Central Arkansas region, with the City's Metropolitan Statistical Area providing about 400,000 jobs to residents in the area and connecting several zones to the regional economy as it is located at the crossroads of Interstate 30 and Interstate 40.³² The City plays a critical role in driving regional employment and commerce, making its recovery essential to the broader economic stability of the surrounding communities. The tornado that struck Little Rock on March 31, 2023, caused widespread damage to commercial corridors, disrupted operations for small businesses, and resulted in job losses when businesses were forced to close. In support of long-term recovery from the event, the City is strategically allocating CDBG-DR funding to invest in workforce development and revitalizing commercial corridors.

2.5.1 Insurance Claims

In the seven months after the tornado, data from the Arkansas Insurance Department shows that business owners filed 455 insurance claims, with insurance companies committing \$283,095,973.14 in assistance to address \$335M in reported damages

To estimate the total cost of damage from the insurance data, the analysis applied the HUD multiplier methodology and assumed that the distribution of damage in insurance claims closed without payment is similar to that of claims closed with payment. As the data only covered insurance claims up to November 1, 2023, new insurance claims made after this date are not captured in the analysis, meaning the true extent of economic impact may be greater.

Insurance Policy Category	Total Damage	Assistance Provided	Unmet Need
Business Interruption	\$25,065,374.36	\$20,701,864.54	\$4,363,509.82
Commercial Auto	\$1,415,592.28	\$1,229,987.47	\$185,604.81
Commercial Property	\$308,585,349.84	\$261,164,121.13	\$47,421,228.71
Total	\$335,066,316.48	\$283,095,973.14	\$51,970,343.34

2.5.2 Business Disruption and Commercial Property Damage

Following the events of DR-4698, the City faced the immediate challenge of business disruption, and property damage. The tornado caused significant damage to prominent shopping centers in the City and free-standing small businesses. At least 50 businesses in the MID area reported closures between March 31, 2023, and September 30, 2023. While it is not noted whether closures were specifically due to the tornado, many businesses across Little Rock faced strenuous

³² (Lupton, 2025)

^{33 (}Hennigan, 2023)

conditions from the impacts of the event, which contributed to many temporary and permanent closures.

According to an initial Damage Assessment Survey conducted by Little Rock's Emergency Management Division in the immediate aftermath of the tornado, at least 29 business properties in Little Rock experienced immense damage. Of the total 55 buildings surveyed, four were rated as having been 'Destroyed', 25 were rated as having sustained 'Major' damage, 24 were rated as having sustained 'Minor' damage, and 2 were rated as 'Not Affected.³⁴ This survey is not allinclusive of damages, but highlights the general impacts that businesses faced following the storm. To facilitate a streamlined recovery timeline, the City waived building permit fees to help facilitate building and repairs of property.

Much of the physical damage from the event 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.³⁵ In the aftermath of the storm, several businesses at the shopping center began the recovery process through their own means, utilizing their own capital and/or private insurance payouts. The impact from the tornado brought on scenarios where businesses had to weigh different options for their path to reopening such as repairing or relocation. For example, Kroger's grocery store at the shopping center spent more than \$4 million on repairs and reopened seven months after the tornado hit.³⁶ The locally owned gear store Rock City Running chose to relocate to a new location in the city instead of waiting for the extensive repair process.³⁷

At the Pavilion in the Park shopping center, the center's restoration is estimated to cost over \$10 million. Construction began in January 2024 upon receipt of an insurance payout and is expected to continue through the summer of 2025. 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 repairs, meant to address duct damage caused by the tornado. 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 \$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.

The disruption of Little Rock's businesses and injury to commercial property led to many store closures which caused job and revenue loss. Financial assistance for businesses impacted by DR-4698 was made available by the U.S. Small Business Administration (SBA), but Little Rock businesses were unsuccessful in accessing the aid. Across the state of Arkansas, SBA provided 30 loans to businesses for \$2,301,000. 41 Little Rock received none of these loans. Only five

³⁴ (Little Rock Emergency Management Division, 2023)

³⁵ (Arkansas Business Staff, 2024)

³⁶ (Wilson, 2023)

³⁷ (Nugent, 2023)

^{38 (}Waldon, 2024)

³⁹ (Hennigan, 2024)

⁴⁰ (Gafner, 2024)

⁴¹ (U.S. Small Business Administration, 2025)

applications were initiated by Little Rock businesses, and all applications were ultimately withdrawn or cancelled. 42 According to the data, two applications were withdrawn as the applicants failed to provide requested information. No information was provided on why the other three applications were cancelled, but the SBA typically cancels an application if an applicant fails to meet eligibility requirements or cannot provide requested information.

2.5.3 Unemployment and the Labor Market

The labor market in Little Rock experienced limited effects from DR-4698, with no significant job loss attributable to the tornado. While the short- and long-term closure of businesses throughout Little Rock disrupted employment for many, an analysis of data from the Arkansas Division of Workforce Services reveals that the unemployment rate in the City was generally lower in 2023 than in the preceding or following year, with an average annual unemployment rate of 3.06% in 2023 compared to 3.28% in 2022 and 3.55% in 2024. ⁴³ It is possible that recovery efforts in the immediate aftermath of the tornado further stimulated job opportunities in industries such as construction, but the data demonstrate that the unemployment rate had already begun to decrease earlier in the year.

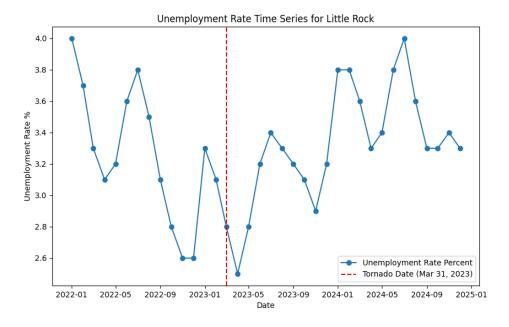


Figure 8. Unemployment Rate in Little Rock, Jan 2022- Dec 202444

2.5.4 Summary of Unmet Economic Revitalization Needs

The City of Little Rock's economy sustained at least \$355 million in damage within the identified MID area, following DR-4698. The damage primarily involved the loss of merchandise, commercial auto, real estate, and estimated revenue loss—with minimal effect on the labor market. Much of the damage experienced was covered by private insurance providers. Typically, Unmet Need is

^{42 (}U.S. Small Business Administration, 2023)

⁴³ (Arkansas Division of Workforce Services, n.d.)

^{44 (}Arkansas Division of Workforce Services, n.d.)

calculated based on SBA loan data as SBA loans are offered to small businesses after a disaster to cover costs that are not already covered by insurance or other forms of assistance. The private insurance claims data provided by the Arkansas Insurance Department only shows seven months post-event data and does not cover the continued claims and payouts that likely occurred. Taking this into consideration along with the SBA data showing that businesses within Little Rock did not receive SBA loans, it is likely that much of the calculated unmet need has been provided through private insurance or other methods. As much of the \$51 million in unmet need is estimated to have been met by private insurance outside of the seven-month data collection timeline, the City is providing a focused allocation of \$1.5 million to the Economic Revitalization program. Through this program, the city will fund activities that restore, stabilize, and grow the local economy through business assistance and workforce development.

Table 21. Summary of Economic Revitalization Unmet Needs

Data Source	Total Damage	Assistance Provided	Unmet Need
Private Insurance	\$335,066,316.48	\$283,095,973.14	\$51,970,343.34
Economic Revitalization Total	\$335,066,316.48	\$283,095,973.14	\$51,970,343.34

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 the greatest 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 EF2.⁴⁵

⁴⁵ 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 Risk Analysis

Per the Pulaski County Hazard Mitigation Plan (CHMP), 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.

Table 22. Hazard Event Occurrence

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	

3.2.1 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.

3.2.2 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. ⁴⁶ 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.

3.2.3 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.

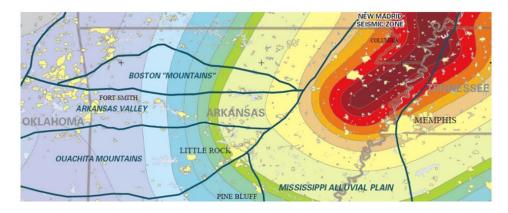


Figure 9. New Madrid Seismic Map

3.2.4 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

⁴⁶ 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.

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.

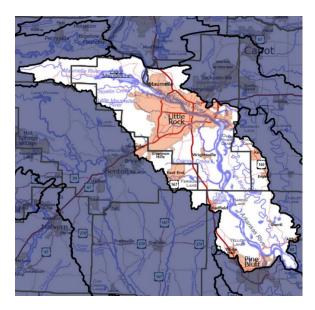


Figure 10. Lower Arkansas Maumelle Watershed

3.2.5 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.

3.2.6 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.

3.2.7 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.

3.2.8 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.

3.3 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.

3.3.1 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. ⁴⁷ 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.

3.3.2 Tornado Recovery and Infrastructure Rebuilds

In response to DR-4698, the City:

- Began the process of rebuilding Fire Station 9 in Walnut Valley, replacing the original tornado-destroyed facility.⁴⁸
- Began the process of reconstructing 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.

3.3.3 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:

- Purchasing emergency generators for the IT Department,⁴⁹ ensuring continuity of city communications during power outages; and for Fire Station 9 to support emergency operations during power outages.⁵⁰
- 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.⁵¹

3.3.4 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'

⁴⁷ (Hennigan, Little Rock officials identify ward-specific streets, drainage projects, 2023)

^{48 (}Frank Scott, 2025)

⁴⁹ (City of Little Rock, Arkansas Board, 2021)

⁵⁰ (City of Little Rock, Arkansas Board, 2025)

⁵¹ (Office of the City Manager Little Rock, Arkansas, 2017)

Department of Environmental Quality. 52 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.

3.4 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 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

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^{52 (}City of Little Rock, 2025)

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. This funding will be allocated to program categories displayed in the table below. 100% of the allocation will be spent in the HUD-Identified MID area of Little Rock.

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.

While Section III.B.1 of the Universal Notice requires that grantees utilize at least 70 percent of funds for activities that benefit LMI persons, the City of Little Rock will be requesting a waiver to reduce that to the minimum 50% requirement as well as to increase the maximum beneficiary AMI from 120% to 150%. While serving the LMI population will remain a priority for the City, the greatest impact from the tornado was geographically in communities with higher-than-average median incomes. The waiver will allow the City to provide recovery assistance to those who are most in need of aid.

The Urgent Need National Objective may be used when necessary to respond to the urgency and location of the disaster-related impact and when the existing conditions pose a serious and immediate threat to the health or welfare of the community. Pursuant to the Universal Notice, the Urgent Need National Objective, as associated waiver is available for 36 months from the date of the City's AAN. After 36 months, the City will be required to follow criteria established in section 104(b)(3) of the HCDA (42 U.S.A. 5304(b)3) and its implementing regulations in 24 CFR part 570.

As Little Rock's total allocation is just over \$20M, total program funding is only approximately \$16.5M due to necessary administrative, planning and mitigation funding. With this limited funding, Little Rock has chosen to focus the majority of funding to address unmet affordable housing needs that were exacerbated by the weather event. While the unmet needs assessment has found \$51 million in unmet need for Economic Revitalization, it is estimated that much of this has been met by private insurance outside of the seven-month economic data collection timeline. Due to this, the City is providing a focused allocation of \$1.5 million to the Economic Revitalization program.

Conversely, while housing represents just 18% of unmet need, the City of Little Rock has elected to allocate 58% of CDBG-DR funds to housing programs since much of the housing need remains acutely present. One reason is that the burden of housing costs falls on individuals who face disruption not only to housing availability but also wages and economic stability following the disaster. This need is especially pronounced in low- to-moderate income populations, and in renters/owners who were already cost burdened prior to the storm. To address the individual housing need following the disaster and to build and rehabilitate housing that is up to code and

resilient to future disasters requires a large proportion of funds in order to address these needs properly.

Table 23. Summary of Unmet Needs and CDBG-DR Allocation

Eligible Cost Category	Unmet Need	% of Unmet Need	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to LMI
Administration	-	-	\$1,044,750	5%	
Planning	-	-	\$200,000	1%	
Housing	\$12,139,722.69	18%	\$12,003,250	58%	65%
Infrastructure	\$3,006,090.78	5%	\$2,500,000		50%
Mitigation Set- Aside	-	1	\$3,147,000	15%	50%
Economic Revitalization	\$51,970,343.34*	77%	\$1,500,000	7%	70%
Public Services	-	-	\$500,000	2%	90%
Total	\$67,116,156.81	100%	\$20,895,000	100%	65%**

^{*}The Unmet Need for Economic Revitalization is based on insurance data provided by the Arkansas Insurance Department that was collected in the first seven months after the event. Any new insurance claim approvals made after this date are not captured in the analysis, meaning the true extent of economic assistance is likely greater.

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. The City will utilize the chart below to rank the projects. Projects will be awarded based off scoring.

Table 24. Funding Criteria

Criteria	Max Points (50)
Project Need is well documented	10
Strength of Tie-Back to DR-4698	10
Demonstrated capacity and experience to carry	10
out project	
Project Cost Reasonability	10
Project Readiness	10

^{**}Subject to approval of the LMI Waiver

In accordance with the 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

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.

Any activity that results in a duplication of benefits (DOB) is an ineligible activity. DOB 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 to assess DOB. 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 event. We are a responsive team with commitment to quality grant service. The City maintains 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.

4.1.4 Distribution and Selection

City of Little Rock will prioritize projects that address unmet needs in disaster-impacted areas, particularly those benefiting low- and moderate-income (LMI) individuals for all CDBG-DR programs (housing programs, economic revitalization, public services, and mitigation programs). Funding distribution and selection will be prioritized based on special population; low-income, elderly and disabled recipients. Then, for applicable housing programs, the selection will utilize 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.

Distribution of Funds

The City of Little Rock will oversee the program. The distribution process will be a combination of direct implementation and through eligible subrecipients.

- Little Rock may accept competitive applications to carry out project activities; or
- Little Rock may implement the programs directly and/or select qualified subrecipients to carry out project activities

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. The Urgent Need National Objective may be used when there is a particular urgency, due to the existing conditions posing a serious and immediate threat to the health or welfare of the community.

Pursuant to the Universal Notice, the urgent need national objective criteria in section 104(b)(3) of the HCDA (42.U.S.C. 5304(b)(3)) is waived for a period of 36 months after the applicability date of the City's AAN. After 36 months, the City will follow the criteria of the aforementioned section.

Activities must address unmet needs in housing, infrastructure, economic revitalization, public services, 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 be 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 58.4(b)(2) and 24 CFR 58.18, 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

Table 25. CDBG-DR Program Allocation and Funding Thresholds

Eligi	ble Cost Category	Budget	% of CDBG- DR Allocati on	Estimated % to HUD Identified MID Areas	Estimate d % to LMI	Estimated % Mitigation Set Aside
Administra	ation	\$1,044,750	5%			
Planning		\$200,000	1%			
Housing	New Affordable Housing Construction	\$6,500,000	34%	100%	65%	0%

Eligible Cost Category	Budget	% of CDBG- DR Allocati on	Estimated % to HUD Identified MID Areas	Estimate d % to LMI	Estimated % Mitigation Set Aside
Homeowner Rehab/Reconstruction Program	\$4,503,250	14%	100%	63%	0%
Homebuyer Assistance Program	\$1,000,000	5%	100%	70%	0%
Infrastructure	\$2,500,000	12%	100%	50%	0%
Mitigation Set-Aside	\$3,147,000	7%	100%	50%	100%
Economic Revitalization	\$1,500,000	7%	100%	70%	0%
Public Services	\$500,000	2%	100%	90%	0%
Total	\$20,895,000	100%	\$100	65%	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 preaward 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-4698).

4.3.1.1 Grantee Administration Activity Overview

Table 26. Administration Allocation

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.

4.3.2.1 Grantee Planning Activity Overview

Table 27. Planning Allocation

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

4.3.3 Housing

4.3.3.1 Housing Programs Overview

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 the New Affordable Housing Construction Program (NAHCP), Homeowner Rehabilitation/Reconstruction Program (HRP), Housing Recovery Assistance Program (HRAP), and Homebuyer Assistance Program (HAP) for eligible households in the applicable 2023 storm impacted areas whose home sustained damage from the storm(s) and developers building new affordable housing. 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 these housing programs, City of Little Rock aims to address unmet housing needs, increase resilience by incorporating hazard mitigation measures, and protect human life.

Table 28. Housing Program Allocation

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
New Affordable Housing	\$6,500,000	65%
Construction Program		
Homeowner	\$4,503,250	63%
Rehabilitation/Reconstruction		
Program		
Homebuyer Assistance	\$1,000,000	70%
Program		
Housing Programs Total	\$12,003,250	65%

4.3.3.2 Grantee Housing Program

Program Title: New Affordable Housing Construction Program

Program Description: The New Affordable Housing Construction Program is intended to address an unmet need regarding affordable housing that was exacerbated by the March 2023 tornado. This program will fill additional gaps in housing need where rehabilitation/reconstruction is not enough to meet housing recovery needs. Little Rock faced a shortage of affordable housing prior to the events of March 2023 which has only increased due to the destruction of homes from the tornado, with an increase in demand for remaining housing units. This program looks to the future by creating both owner and renter occupied affordable housing to ensure that households across Little Rock, including LMI households, have access to affordable housing.

Under this program, The City of Little Rock will support the construction of affordable housing units (including single-family, small rental, or multi-family housing) in the MID area. The goal is to increase the long-term supply of resilient, affordable units, especially for households impacted by DR-4698. The completed developments will provide long-term affordable housing for income-

eligible households. This program will also provide funds to acquire and/or develop affordable homes for first-time homebuyers or leaseholders earning up to 150% of the Area Median Income (AMI)*.

The City of Little Rock will provide funds to developers for projects in the form of a subsidy or loan. Affordable housing units may be developed on land that includes, but is not limited to, City acquired/owned land. Homes will be constructed and sold/rented at affordable prices to eligible households.

Eligible Activity(ies): Acquisition of real property, New Construction of Affordable Housing Units, Disposition of real property acquired, Demolition and clearance of blighted structures. All activities are authorized under the Housing and Community Development Act (HCDA) Sections 105(a)(1), 105(a)(4), and 105(a)(7), 24 CFR 570.201 and 24 CFR 570.202, and applicable federal guidance, waiver, or alternative requirement.

National Objective: The national objective of the New Affordable Housing Construction Program is to benefit 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: The City of Little Rock is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

City of Little Rock- Department of Housing and Neighborhood Programs is the lead agency for administering this program. The distribution model will be a combination of direct implementation and through eligible subrecipients:

- The distribution model is competitive and project-based: funds are awarded to projects that meet program criteria and can execute timely.
- If needed, the City, may also directly procure a development partner or manage construction itself.
- The City may issue a competitive solicitation for proposals from qualified developers and/or non-profits/Community Based Organizations (CBOs) or contractors as part of the implementation process.

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

Other Eligibility Criteria:

- Projects must demonstrate tie-back to a qualifying 2023 storm.
- Projects must not duplicate benefits.

- Applicants must be for profit developers, not for profit developers, and Community Based Organizations (CBOs).
- Homes/manufactured housing units.
- Household income must be at or below 150% AMI.*

Other eligibility criteria will be further defined as part of the program design phase and included in the program policies and procedures.

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

Maximum Amount of Assistance Per Beneficiary: The maximum assistance is \$400,000 per unit.

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 program guidelines

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

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.

Reducing Barriers for Assistance: The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

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

Program Title: Homeowner Rehabilitation/Reconstruction Program (HRP)

Program Description:

The tornado of March 2023 caused extensive damage to homes across Little Rock, particularly in neighborhoods such as Walnut Valley, Napa Valley, Cammack Village, River Ridge, Briarwood and Shackleford which are densely populated residential neighborhoods. Over 140 residences were found to have Major-Low or higher damage when inspected by FEMA, leaving the unmet need for recovery high. City of Little proposed the Homeowner Rehabilitation/Reconstruction Program to address these unmet needs to provide these households with assistance to make repairs, reconstruct, replace their homes or receive reimbursement for eligible repairs, rehabilitation or reconstruction costs incurred prior to applying for CDBG-DR assistance. All repaired, reconstructed or replaced homes will incorporate mitigation measures to better protect against future weather events. Under this program, the City of Little Rock proposes the following housing assistance activities:

- Rehabilitation or reconstruction 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.
- Reimbursement for eligible expenses incurred
- Temporary housing assistance based on individual tenant/homeowner needs and their participation in the HRP.
- For reimbursement eligibility, eligible work must be completed within two years of the grantee's initial Applicable Allocation Notice (AAN) date for the disaster or the date of application.

Eligible Activity(ies): Reconstruction/Rehabilitation of Existing Housing, Reimbursement of Disaster Recovery expenses for homeowners, demolition and clearance of blighted structures, residential buyout and relocation, acquisition of real property. All activities are authorized under the Housing and Community Development Act (HCDA) Sections 105(a)(1), 105(a)(4), and 105(a)(7), 24 CFR 570.201 and 24 CFR 570.202, and applicable federal guidance, waiver, or alternative requirement.

National Objective: The national objective of the HRP is to benefit 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: Lead Agency and Distribution Model: The City of Little Rock is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

City of Little Rock- Department of Housing and Neighborhood Programs is the lead agency for administering this program. The distribution model will be a combination of direct implementation and through eligible subrecipients.

For direct implementation, with the assistance of staff and vendors, the City will bid out projects to qualified contractors. The lowest responsible bidder will be assigned to repair or reconstruct 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 the HUD-identified MID area. 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 which were damaged or destroyed by DR-4698.
- Applicants must have documented disaster-related damage.
- Household income must be at or below 150% AMI.*
- All applicants will undergo duplication of benefits review to verify that reimbursements are limited to eligible, unmet costs not already covered by FEMA, SBA or insurance.
- The applicant must have owned and occupied the home as their primary residence at the time of the qualifying disaster DR_4698 and must retain an ownership interest in the property at the time of application.
- For reimbursement eligibility, the applicant must have documented expenditures for eligible rehabilitation, demolition, or reconstruction costs directly resulting from damage caused by DR-4698 as verified through documentation and/or cost estimating tools.
- All disaster-related repairs must be fully completed prior to the submission of an application for reimbursement.

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 of the applicable qualifying storm. 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

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

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.

The maximum assistance for reimbursement of prior costs is \$50,000 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 HRP 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. Applicants will not receive any direct payment(s) for temporary housing assistance. Direct payments will be made by the Program to the qualifying 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.

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. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

The City of Little Rock will use its internal communications and marketing team to ensure all households have the 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 reallocate additional funding from other programs to maximize assistance for prioritized eligible applicants seeking assistance.

Program Title: Homebuyer Assistance Program (HAP)

The Homebuyer Assistance Program is City of Little Rock proposes the following housing assistance activities under this program:

Eligible Activity(ies): Direct Assistance to facilitate and expand homeownership

National Objective: The national objective of the HAP is to benefit 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: The City of Little Rock is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

City of Little Rock- Department of Housing and Neighborhood Programs is the lead agency for administering this program. The distribution model will be a combination of direct implementation and through eligible subrecipients.

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

Program Description: Homebuyer Assistance Program will provide direct assistance to homebuyers to facilitate and expand on behalf of the purchaser and pay reasonable closing costs associated with the home purchase on behalf of the purchaser for eligible populations. Assistance

will be offered through a grant. A deed restriction will be placed on the mortgage based on the subsidy.

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

Program Eligibility: The HAP Program will serve first-time homebuyers in the HUD identified MID area. The following additional eligibility criteria apply:

- Projects must demonstrate tie-back to a qualifying 2023 storm.
- Projects must not duplicate benefits.
- Must be a new or existing single-family, detached dwelling with no more than four (4) living units.
- Property must be inspected by city staff and meet the City of Little Rock Minimum Housing Code Standards:
 - o If dwelling is pre-1978, a lead-based paint inspection and risk assessment is required, if there is chipping and peeling paint on the structure
 - Buyer must be a first-time homebuyer (not have owned any residential property within last three (3) years).
 - Buyer must agree to own / occupy the property for a minimum of five (5) years (Affordability Period).
 - Buyer must complete a homebuyer counseling course, acceptable to the City of Little Rock.
 - Household income must be at or below 150% AMI. *This is subject to HUD approval of the LMI waiver.

The HAP will follow the conditions below. The total down payment assistance to any buyer and/or property may not exceed eight (8) percent of the purchase price, not to exceed \$15,000.00. The assistance will be structured in the form of a forgivable loan. DPA documents will be prepared by the City of Little Rock. The loan is forgiven in equal installments over a 60-month period. Mortgage subsidy assistance from the City may not be used in conjunction with the down payment assistance program funds. The forgivable loan cannot be used to assist refinancing for an existing owner. All repairs must be completed on the unit prior to approval of the assistance. There will be no cash back at closing to the borrower. All original documentation must be sent to the City of Little Rock. Assumptions will not be allowed. Hazard insurance will be required to show City of Little Rock as second mortgage. Funds cannot be used to buy down mortgage loan.

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

Maximum Amount of Assistance Per Beneficiary: The maximum assistance for HAP is \$15,000 per unit.

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 HAP 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.

Reducing Barriers for Assistance: The program will implement measures to reduce impediments to access by offering reasonable accommodations and support for those who need assistance accessing the program. Throughout its recovery activities, the City will seek to proactively engage impacted communities to ensure that needs are met.

For this program, the City of Little Rock will recoup all or a portion of the CDBG-DR subsidy provided to the homebuyer(s)/leaseholder(s) if the unit ceases to be the principal residence of the homebuyer(s)/leaseholder(s) during the required affordability period.

All subsidy amounts that directly benefit the homebuyer are subject to recapture, including development subsidies used to reduce the sales price below market. The affordability period and recapture terms will be defined in a written agreement and recorded in the property title.

4.3.4 Infrastructure

4.3.4.1 Infrastructure Programs Overview

The City of Little Rock proposes implementing infrastructure and public facilities improvements including, but not limited to, bridge and culvert improvements or replacement, repair of water/sewer infrastructure, debris removal, park revitalization, and road rebuilding or relocation. Within these activities, Little Rock will address several key priorities as stated by HUD in the Universal Notice.

Table 29. Infrastructure Program Allocation

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

4.3.4.2 Grantee Infrastructure Program

Program Title: Infrastructure

The 2023 tornado in Little Rock, AR affected many communities' infrastructure systems such as damaging roadways, water systems, parks, 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.
- 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 LMA as the national objective for infrastructure projects. The Urgent Need National Objective will only be used if the project does not meet LMA 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: The City of Little Rock is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

City of Little Rock Department of Housing and Neighborhood Programs will oversee the program. Distribution process will be through City direct implementation or through eligible subrecipients.

When directly implementing, the 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 benefits 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.

Program Description: The Infrastructure Program is designed to restore and enhance public infrastructure systems that sustained damage as a result of DR-4698. The program will prioritize critical infrastructure investments that address urgent health and safety needs and improve resiliency to future disasters. Eligible activities may include but are not limited to repair, replacement, or relocation of public facilities and systems, demolition and rehabilitation of publicly- or privately-owned commercial or industrial buildings, debris removal, and implementing natural and green infrastructure.

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, City 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:

Minimum Award: \$100,000Maximum 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.

4.3.5 Mitigation Set-Aside

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, be 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 CHMP
- Be considered CDBG-eligible under Title I of the HCDA or pursuant to a waiver or alternative requirement; and
- Meet a national objective

Table 30. Mitigation Program Allocation

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	\$3,147,000	50%	No
Aside Program			
Mitigation Program	\$3,147,000	50%	
Total:			

Program Title: Mitigation 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." The Mitigation Program 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: The City of Little Rock is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

City of Little Rock will oversee the program. The distribution process will be a combination of direct implementation and through eligible subrecipients.

When directly implementing, the 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 benefits 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: The Mitigation Program is designed to reduce the risk and impact of future disasters by investing in resilient infrastructure systems, with a primary focus on stormwater management and critical public facilities. The program's purpose is to support long-term recovery by addressing vulnerabilities exposed by the tornado. The program will prioritize projects that mitigate storm risk, manage stormwater and debris more effectively, and strengthen critical public systems that are essential for community health and safety.

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

Table 31. Economic Revitalization Program Allocation

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

Economic	\$1,500,000	50%
Revitalization Program		
Total:		

Program Title: Economic Revitalization

The 2023 tornado in Little Rock affected many businesses. City of Little Rock is allocating \$1,500,000 to support long-term recovery in communities impacted by 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 to benefit LMI persons or Urgent Need (meeting a need having a particular urgency).

The City of Little Rock will first consider LMI as the national objective for economic revitalization 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 is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

City of Little Rock will oversee the program. The distribution process will be a combination of direct implementation and through eligible subrecipients.

Program Description: The Economic Revitalization Program is designed to support the recovery and long-term resilience of the local economy impacted by DR-4698. The program aims to support the businesses, workers, and commercial districts that suffered economic disruption of physical damage, while laying the foundation for sustainable economic growth across the community. The program focuses on job restoration and retention, workforce development, commercial façade and infrastructure improvements.

Eligible activities include though are not limited to:

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/Subrecipients 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. Subrecipients 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. Applicants/subrecipients must:

- be a small business, defined as having 500 or fewer employees.
- 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.
- be able to show how assistance will support job retention or creation, especially for lowand 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

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

Table 32. Public Services Program Allocation

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

Program Title: Public Services

The disaster significantly disrupted essential public services in impacted communities, disproportionately affecting 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 to public services.

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 public service 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: The City of Little Rock is the responsible entity (RE) assuming the authority for the decision making and completion of the environmental review per 24 CFR 58.4.

Distribution model will be a combination of subrecipients and City direct implantation. 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 subrecipients:

- 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

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 Action Plan Amendments

Any amendments to the CDBG-DR Action Plan will be in accordance with the requirements set forth in the Universal Notice. ⁵³ In the case of amendments, the City of Little Rock will follow two alternative citizen participation processes. Every amendment, substantial or not, shall be numbered sequentially and posted on the website.

In the case of a substantial amendment, the procedures laid out in the CDBG-DR Universal Notice will be followed and will adhere to citizen participation requirements, by making proposed changes public on City of Little Rock's CDBG-DR website (City of Little Rock CDBG-DR website) and through public notices with a public comment period of a minimum of 30 days. No substantial amendments will be implemented prior to approval from HUD.

A substantial amendment shall be defined as:

- a change in program benefit, beneficiary or eligibility criteria,
- the allocation or reallocation 15 percent or more of the budget,
- A proposed reduction in the overall benefit requirement, 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.

5.2 Citizen Participation

The City of Little Rock maintains a Citizen Participation Plan that includes HUD's requirements under 24 CFR.91.105. The Action Plan outlines procedures to support community engagement and participation, for a community-driven approach to utilizing CDBG-DR funds.

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.

5.2.1 Consultation

During the preparation of this Action Plan, The City of Little Rock consulted with the State of Arkansas. The City of Little Rock is the lead agency of Continuum of Care in Central Arkansas. The City 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

^{53 (}U.S. Department of Housing and Urban Development, 2025)

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.

5.2.2 Publication

A copy of the draft action plan can be found on the City of Little Rock's dedicated CDBG-DR webpage - City of Little Rock CDBG-DR website. This action plan will be posted for at least 30 days on the webpage for public comment. 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. 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 on 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 was held virtually on July 14, 2025 during the public comment period to ensure all residents' communications are captured. As with the prior virtual hearing, attendees were able to pose questions in the chat in real time and ask questions verbally.

Public meetings were publicized in coordination with impacted jurisdictions. Outreach was conducted through state, federal, local governments, tribal communities, public housing-related service providers, for-profit developers, professional organizations, other known constituency groups, and citizens who have requested direct notification as well as through groups, organizations and agencies which provide services to low- and moderate-income persons.

5.2.3 Public Comments

The City of Little Rock provides a summary below of public comments received for the 2023 Disaster Recovery tornado during the public comment period and from public meetings between April and July of 2025. The City of Little Rock has updated this section with a summary of the comments and responses to the comments. Comments as received in their original form will be available upon request.

Table 33. Comments Received and Grantee Response

Comment Received	Grantee Response
	We would need additional information on
Would the removal of electrical poles installed after	this to verify this does not constitute a DOB
the tornado or transition to underground cable be	but could be considered for eligibility
eligible activities under the infrastructure program?	through and application under the
	infrastructure program.

Comment Received	Grantee Response
Would the restoration of a park pool and pool house that was damaged by the tornado be an eligible activity under the infrastructure program?	Yes, this would be considered park revitalization.
If funds are allocated to businesses in Walnut Valley, we would like to avoid projects that require re-zoning.	We acknowledge the comment and note that all zoning matters are handled by the Planning Division, who would provide advisement.
Is the Area Median Income (AMI) based on city or impacted area?	The AMI is based on the impacted area.
Comparing the survey on priority allocation to the proposed allocation, it seems that infrastructure received a higher priority than housing. However, shouldn't they have the same budget allocation based on public feedback?	The City did a lot of infrastructure work early on in the recovery process and recognizes the cost of housing is higher in Little Rock compared to other areas. We have requested a waiver from HUD so impacted residents making up to 120% of the AMI can receive funding for housing projects.
A large concern of ours is the debris on personal property that was not picked up or covered by insurance in the green areas around North Ridge Road. Would removal be an eligible activity?	Yes, debris removal from personal property is an eligible activity under the infrastructure program.
As many vacant lots were purchased to eventually make profit, the number of eligible applicants would be small. What is the criteria for affordable housing?	The goal of the housing programs is not to bring home values down but to restore property values. No houses will be developed to bring property values down but made to be affordable to the buyer.
If there is a resident who had to pay \$20,000 for debris removal because FEMA and insurance couldn't cover it, is the debris removal an eligible activity?	Yes.
Is the Homebuyer Assistance program for those who were displaced or those interested in buying in the neighborhood?	It is for both.
Would a sound barrier be an eligible activity under the infrastructure program as a green space activity? The highway is incredibly loud now since all the brush was lost during the tornado.	The funding for that activity would not be from this grant, however the City is working on other grants and the State received \$50 million for recovery as well.
Can the city pay for a sound barrier and green space?	If the sound barrier is part of a disaster mitigation or resilience project and reduces a new or exacerbated impact, it may qualify.

Comment Received	Grantee Response
The disaster area was impacted by trees. Will this	Yes, infrastructure will be an eligible
grant cover infrastructure? The area is affected by	activity.
noise from the highway because the trees have	
been removed.	
Can I use funds from this grant for legal services	Voc. as long as honofits are not duplicated
incurred around tree removal due to the tornado?	Yes, as long as benefits are not duplicated.
Is there a current inventory of houses that haven't	The Planning Department has a list of
been rebuilt yet?	currently completed projects.
Wouldn't the \$200,000 allotted to Planning actually	The \$200,000 allocation would be used for
be part of Administration?	other planning activities.
	Yes, waterway cleaning would be
Is waterway cleaning an eligible activity?	considered an eligible mitigation activity to
	mitigate the future impacts of floods.
Most of us don't meet the income gaps, how can we	We have asked HUD for a waiver to increase
be assisted?	the income limits.
Can individuals apply for neighborhood property or	We are not sure at this time. We will ask this
would the POA needs to apply for assistance if this	question during technical assistance
is not private property.	training(s).
Noted concern that community has felt taken	The City vouches for the validity of this
advantage of before and wants assurance these	program.
programs are real.	program.
	Meeting advertisements are posted on
How have public meetings been advertised?	Facebook, the City's dedicated CDBG-DR
	webpage, and the City's calendar.
Will the grant money assist with Renters Insurance	We will not utilize grant funds to directly pay
gaps?	for renter's insurance or insurance gap
	coverage.
Can this money clear out debris in the creeks?	Yes, debris removal is an eligible expense.
Does this money cover tree replacement (planting)	Yes, as long as the project meets the
or drainage upgrades?	program's eligibility and national objective
	requirements.
How does the application process work for an	There will be an online system to submit
individual? Will all applications be awarded?	your application. We are in the process of
	procuring the application software. Only
	eligible and feasible applications will be
	awarded.
Can this funding help with easement problems?	Yes, in eligible conditions like infrastructure
	repair.

Comment Received	Grantee Response
Please explain the affordable housing goal. Will there be a Quad Plex built to replace single family homes?	No, Quad Plex will be built to replace single family homes. The goal is to rebuild impacted communities with the same or similar housing units that were in place prior to storm.
There is noted concern around the practices of developers and contractors by the community.	The City acknowledges the comment. The grant can cover legal expenses to eligible persons.
Is it possible for the city or others to buy lots and leave it undeveloped for 5 years?	The City has to adhere to timeliness. We will not leave a property acquired to develop housing vacant for an undue amount of time.
Streets need to be resurfaced. Can this grant assist with this need? What if the person who filed an insurance claim and	This may qualify under mitigation or infrastructure if it was damaged by storm. Yes.
only partial was serviced? Can they use an application for the outstanding portion not covered?	The Oite has to call are to time line on Manill
Is it possible for the city or others to buy lots and leave it undeveloped for 5 years?	The City has to adhere to timeliness. We will not leave a property acquired to develop housing vacant for an undue amount of time.
How long is this going to take and when will we hear about a follow-up or approval to complete application?	We have to go through a 30-day comment period prior to submitting to HUD. We look to have applications available by October 2025.
Will this money assist with foundation? The foundation was messed up and not covered by insurance.	Yes, this may be eligible.
Can this funding replace Street Light Post and Lights that were knocked down during the storm. It's dark?	Yes.
Can you share information about other grants that can assist with trees for the area?	Please check with the City's Parks Department for possible additional funding opportunities.
Can you guide us through the state application process to apply for infrastructure funding?	We are unsure of the States application process. Residents will need to contact the State for their process.

Comment Received	Grantee Response
When are you anticipating the public comment	The public comment period began on July 1,
period to be open?	2025.
Neighborhood associations want to reserve a	Yes, please make arrangements with staff at
meeting room to help residents complete the	any City owned facility.
application. Is that, ok?	
Are the amounts based on public need or stature?	They are based on the unmet needs.
How will you contact residents that are not on the	To further reach resident we have shared
email list?	meeting with neighborhood associations in
	the impacted areas.
What is the dollar amount for admin?	\$1,044,750
To understand the unmet need are you getting the	Both. We utilized the unmet needs
data from the community or from your action plan?	assessment , Small Business
	Administration (SBA), and FEMA data.
How did you derive at the percentage for the	The percentages were derive from review of
disaster aid?	the unmet needs, residential survey, FEMA
	and SBA data.
What qualifying data do you use, surveys, forms or	We utilized FEMA and SBA data.
research?	
Can we explore possibilities to use underground	Yes, we will ask our consultants.
utility or use what was used before?	
Sidewalks, fire station, and Reservoir Park have	Approved projects with other money
been previously approved. Are there plans to use	allocated towards them will be separate.
the grant with the already approved funds?	
There is a fundraising event and plans for Reservoir	No, the City's Parks Department is working
Park. Is this the same bucket of money?	on the fundraising which is a different pot of
	money.
Can we review the needs assessment information?	Yes, it is posted on the CDBG-DR webpage.
When should we have our responses completed for	May 31, 2025.
the survey	
Can we confirm whether the property in the	We would need the actual property address
backyard is considered neighborhood or state	to determine.
highway?	
Can we call code on eyesores?	Yes, please submit all code concerns by
	calling 311.
How many more meetings will you have to hear the	Three meetings were held on 4/3/2025,
voices of residents?	5/8/2025, and 7/14/2025. Comment was
	submitted at 4/3/2025 meeting.

Comment Received	Grantee Response
What impacted areas do you have listed?	The entire City of Little Rock is listed as an
	impacted area. All areas can be found on
	the City's CDBG-DR webpage.
Will amendments be made to the budget?	Budget amendments may be made because
	changes will happen over the 5-year
	timeframe. We are working on the budget
	cap and timeline to start.
Does the completed survey outcomes take priority	The survey outcomes are important as is the
for the budget allocations?	unmet data.
Will the proposed presentation be presented to	Yes, the Directors will have it as it will also
Directors?	be on the CDBG-DR webpage.
Why isn't the infrastructure a bigger amount than	The difference is budget projection because
housing?	Housing cost more to develop based on the
	shortage gap and limited eligible applicants.
	Currently submitting a waiver.
What is the percentage breakdown of the budget?	The breakdown is 57% Housing, 27%
	Infrastructure and Mitigation, 7% Economic
	Revitalization, and 2% Public Services.
How do the attendees that didn't get a personal	Send us an email at
email stay connected?	CDBGDR@LITTLEROCK.GOV to be added to
	the communication lists.
There are empty lots. What will be done with those	Empty lots may be developed through new
lots?	construction housing units.
What is the goal for removing the outstanding	The City's goal is to ensure public safety by
debris?	eliminating hazardous materials, downed
	trees, unstable structures, or other dangers
	to residents and responders.
Will this grant be able to assist with green space?	This may be an eligible expense.
Are there funds to replace and get trees?	Yes, under infrastructure.
What is considered affordable housing?	Housing that is affordable to residents in the
	area. We will aim to develop homes that are
	comparable in price to the homes already in
	the area.
Will amendments be made to the budget?	Budget amendments may be made because
	changes will happen over the 5-year
	timeframe. We are working on the budget
	cap and timeline to start.
Does the completed survey outcomes take priority	The survey outcomes are important as is the
for the budget allocations?	unmet data.

Comment Received	Grantee Response
How much was spent on debris removing back in	It was approximately \$20,000.
2023?	
What will be the targeted income qualification rate?	120% of the Area Median Income.
How can we receive help for pool repair?	If it is a part of the neighborhood
	association, a rep will need to apply.
If housing doesn't go as planned, will we adjust on a	Yes.
marginal scale?	
Is the Bill of Insurance for the neighborhood	Yes, usually.
association renewed yearly?	
What is the contact email?	CDBGDR@LITTLEROCK.GOV
What is being done for the safety hazards	The City has set-aside funds for mitigation.
(mitigation) in the Action Plan.	We will need to review applications once
	they open.
Has construction planning begin for Station 9?	Yes.
Is the water way and easement bank considered in	Yes, they aren't specifically mentioned but
the action plan?	have been taken into consideration.
Can this funding replace a neighborhood fence	This may be an eligible expense.
divided between church and subdivision?	
Woodlawn hills. Is this applicable for private	
schools.	
How do you apply for funding?	Once the application is open, please visit
	our dedicated CDBG-DR webpage to apply.
Will you help us with completing the application?	Yes, we will have dedicated staff to assist
	with the application process.
What is the Area benefit amount now? And what is	The waiver is at 120% AMI.
the waiver? Because this area is not Income	
eligible.	
How will the application be distributed?	It will be available online and by calling our
	office.
How much was spent on debris removing back in	It was approximately \$20,000.
2023?	

5.3 Performance Reports

The City of Little Rock will submit all required reports following the format and rules set by the U.S. Department of Housing and Urban Development (HUD) though the DRGR (Disaster Recovery Grant Reporting) system. These reports will serve as documentation on the use of CBDG-DR funds and how activities are meeting recovery needs.

Quarterly Performance Reports

Quarterly Performance Reports (QPRs) will be submitted to HUD through DRGR 30 days after the close of each quarter, as required by HUD through the time at which all projects are closed.

5.4 Pre-Award Costs

City of Little Rock may seek reimbursement for costs incurred prior to the approval of the Action Plan and signing of the grant agreement pursuant to the section III.B.14 of the Universal Notice which outlines the eligibility for pre-award costs.

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).
- 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 91.225(a)(1), (a)(3), and (a)(7)
 - b. Community Development Block Grant Program Certifications at 24 CFR 91.225(b)(5), (b)(6), (b)(7) and (b)(8).

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