IOWA™
Economic Development







The State of Iowa

Consolidated Action Plan

2024 Midwest Flooding

May 2026

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Action Plan Amendments

Initial Action Plan

Approved by HUD: July 11, 2025

The following amendments have been incorporated into this Consolidated Action Plan:

Action Plan Amendment 1 (Substantial Amendment)

Submitted to HUD: October 23, 2025

Approved by HUD: December 4, 2025

- Addition of Lyon, Buena Vista, and Pottawattamie counties as Grantee-Identified Most Impacted and Distressed (MID) areas in each program as eligible geographic Areas

Action Plan Amendment 2 (Substantial Amendment)

Submitted to HUD: April 7, 2026

Approved by HUD: May 7, 2026

- Addition of Dickenson and Osceola counties as Grantee-Identified Most Impacted and Distressed (MID) areas in each program as eligible geographic areas.
- Reallocation of $10 million from the General Infrastructure program to the FEMA Non-Federal Match program.

Program	APA 1 Budget ("Before")	APA 2 Budget Changes	APA 2 Budget ("After")
New Housing Construction Single-Family Owner-Occupied Program	30,000,000.00	$0	30,000,000.00
New Housing Construction Rental Program	10,000,000.00	$0	10,000,000.00
Infrastructure in Support of Housing	10,000,000.00	$0	10,000,000.00
General Infrastructure	49,483,950.00	(10,000,000.00)	39,483,950.00
FEMA Non-Federal Match	15,000,000.00	10,000,000.00	25,000,000.00
Planning	13,468,700.00	$0	13,468,700.00
Administration	6,734,350.00	$0	6,734,350.00
TOTAL	**$134,687,000.00**	**$0**	**$134,687,000.00**

1. Executive Summary

1. Executive Summary

1.1. Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Iowa will receive $134,687,000 in funding to support long-term recovery efforts following the June 2024 Iowa Flooding (FEMA DR-4796-IA Iowa Severe Storms, Flooding, Straight-line Winds, and Tornadoes) through the Iowa Economic Development Authority (IEDA). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet need in the State of Iowa.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated $134,687,000 in CDBG-DR funds to the State of Iowa in response to the June 2024 Midwest Flooding (FEMA DR-4796-IA), through the publication of the Federal Register, Vol. 90, No. 10, January 16, 2025 (FR–6512–N–01). This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025 (Pub. L. 118-158).

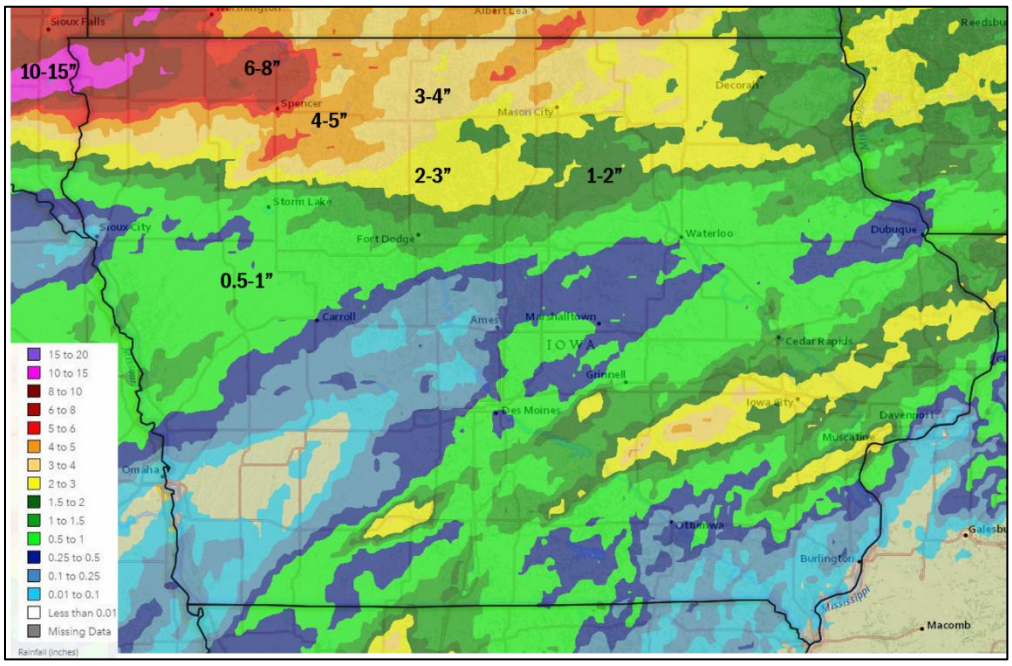
1.2. Disaster-Specific Overview

Beginning on June 20, 2024, through early June 21, heavy rain fell over portions of northern Iowa, especially northwestern Iowa up into portions of southwest Minnesota and southeastern South Dakota. As another round of heavy rain fell later on June 21 into the night and morning of June 22, this rainfall led to increased flash flooding. As covered more in the mitigation needs assessment, flash flooding is one of the major risks factors that Iowa faces.

The multi-day heavy rainfall event led to widespread heavy rain across the region. For example, rainfall totals over a three-day period exceeded 2 inches in nearly all areas, with widespread totals between 5 inches and 10 inches. In pockets of southeastern South Dakota and northwest Iowa, rain totals between 10 inches and 20 inches were reported. The rainfall also made its way into streams and rivers, resulting in significant and record river flooding in northwest Iowa, including for portions of the Missouri River, Cedar River, Des Moines River, Little Sioux River, Big Sioux River and Rock River.

This flooding resulted in residents being forced to flee their homes and seek higher ground as water destroyed roads and bridges; the partial failure of a dam; and over 300 homes and businesses being destroyed, with thousands more being damaged. Additional impacts included the closure of both major interstates (I-29 and I-90) along with countless other federal, state, and county highways. While many cities in Iowa were impacted, more widespread flooding took place in the communities of Rock Rapids, Rock Valley, Hawarden, Spencer, Sioux Rapids and Cherokee.

Figure 1: June 20-22, 2024, 3-Day Multi-sensor Estimated Rainfall



Reference: National Weather Service - Flooding in Northwest Iowa

On June 24, 2024, the disaster was declared a major disaster for Iowa counties where significant damage was sustained from severe storms, flooding, straight-line winds and tornadoes that occurred beginning on June 16, 2024.[1] For the FEMA Individual Assistance (IA) program, the declaration made federal funding available to affected individuals and households in:

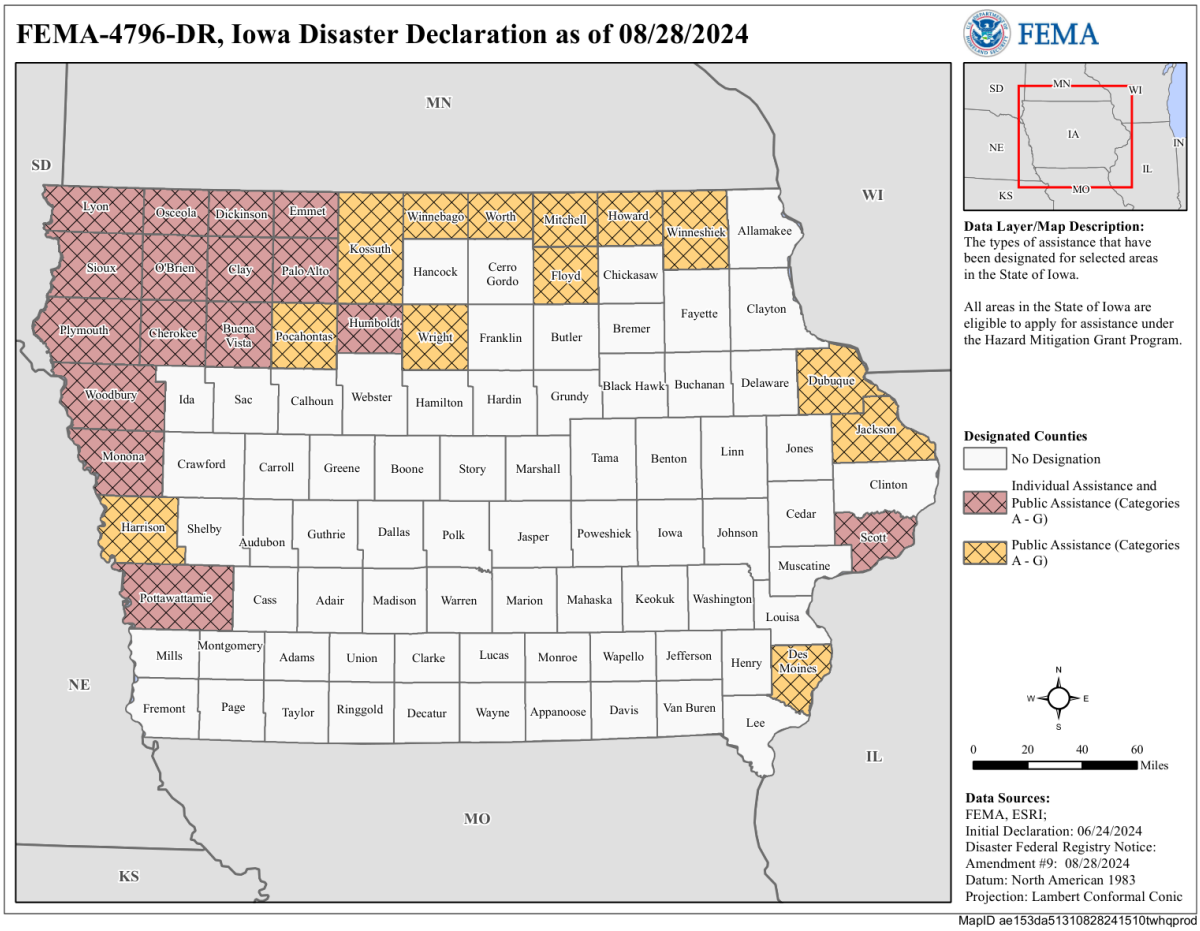
- Buena Vista County
- Cherokee County
- Clay County
- Dickinson County
- Emmet County
- Humboldt County
- Lyon County
- Monona County
- O'Brien County
- Osceola County
- Palo Alto County
- Plymouth County
- Pottawattamie County
- Scott County
- Sioux County
- Woodbury County

For the FEMA Public Assistance (PA) Program, the declaration made federal funding available to affected government agencies and organizations for emergency work and the repair or replacement of disaster-damaged facilities in:

[1] President Joseph R. Biden, Jr. Approves Iowa Disaster Declaration

Buena Vista County	Humboldt County	Pocahontas County
Cherokee County	Jackson County	Pottawattamie (County
Clay County	Kossuth County	Scott County
Des Moines County	Lyon County	Sioux County
Dickinson County	Mitchell County	Winnebago County
Dubuque County	Monona County	Winneshiek County
Emmet County	O'Brien County	Woodbury County
Floyd County	Osceola County	Worth County
Harrison County	Palo Alto County	Wright County
Howard County	Plymouth County	

Figure 2: FEMA-4796-DR, Iowa Disaster Declaration as of 08/28/2024



1.2.1 HUD-Identified MID Areas

HUD requires CDBG-DR funds to be used to address unmet needs in the Most Impacted and Distressed (MID) areas resulting from qualifying disasters. IEDA is required to spend at least 80% of its CDBG-DR funds, or $107,749,600, to benefit the HUD-identified MID areas. According to the Allocation Announcement Notice (AAN), HUD has identified the following MID areas in the State of Iowa: Cherokee County (ZIP code 51012); Clay County; Sioux County; and Woodbury County (ZIP code 51109). For simplicity, the entirety of each county will be treated as the HUD MID area.

1.2.2 Grantee-Identified MID Areas

IEDA can choose to spend a portion (i.e., up to 20% or $26,937,400) of its award outside of the HUD-identified MID area. The 20% may only be used to address areas that received a presidential major disaster declaration (see figure 2 above) and IEDA determines have the greatest amount of damage and unmet need outside of the HUD-identified MID areas. Five grantee-identified MID areas have been selected; Pottawattamie, Buena Vista, Lyon, Dickenson, and Osceola counties. The unmet needs section of the Action Plan outlines with quantifiable and verifiable data that these areas have remaining unmet need. Low- and moderate – income (LMI) individuals and areas in these State MID areas will be prioritized just as they will be in the HUD MID areas.

1.3. Overview of the Impacts of the Qualifying Disaster

In June 2024, a series of severe storms swept across northern and northwestern Iowa, leaving widespread devastation in their wake. Residents in impacted areas had to be evacuated because of rising water from nearby rivers or levee failures. Those evacuations and rescue efforts were made more difficult by roads, railroads, and bridges across the region being closed to the public because of stretches of road being substantially damaged by the flooding, making recovery efforts dangerous.

Overall, six casualties were reported due to the flooding event. Over 5,000 homes were damaged as a result of the flooding — homes were affected by water damage, electrical damage, appliance damage, sewage leakage, plumbing damage, etc. And in Iowa's agricultural areas, there were some indications that there may have been some crop damage due to standing water.[2] IEDA will look to address these impacts during the recovery.

[2] Iowa, Minnesota, South Dakota cope with extreme flooding after torrential rains

Table 1: Disaster Overview

Disaster Summary	
Qualifying Disaster:	June 2024 Midwest Flooding (DR-4796-IA)
HUD-Identified MID Areas:	Cherokee County (ZIP code 51012); Clay County; Sioux County; and Woodbury County (ZIP code 51109)
Grantee-Identified MID Areas	Pottawattamie County, Buena Vista County, Lyon County, Dickenson County, and Osceola County

Table 2: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview	
CDBG-DR Allocation:	$117,119,000
CDBG-DR Mitigation Set Aside:	$17,568,000
Total Allocation:	$134,687,000

2. Unmet Needs Assessment

2. Unmet Needs Assessment

The information collected through the unmet recovery and mitigation needs assessment process serves as the foundation for the State's Community Development Block Grant-Disaster Recovery (CDBG-DR) program funding and prioritization decisions.

To prepare the unmet needs assessment, the Iowa Economic Development Authority (IEDA) consulted with and drew on data from the following:

- U.S. Department of Housing and Urban Development (HUD)
- Federal Emergency Management Agency (FEMA)
- U.S. Army Corps of Engineers (USACE)
- Small Business Administration (SBA)
- U.S. Census Bureau
- U.S. National Oceanic and Atmospheric Administration (NOAA)
- Iowa Finance Authority (IFA)
- Iowa Homeland Security and Emergency Management (HSEM)
- Iowa Workforce Development (IWD)
- Iowa Institute for Community Alliances (ICA)
- Councils of Governments (COGs)
- Local Governments
- University of Northern Iowa (UNI)

Table 3: Unmet Needs and Proposed Allocations

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD- and Grantee-Identified MID	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Rental Housing	$35,350,000[3]	7.98%	100%	$10,000,000	7.42%
Owner-Occupied Housing	$172,482,000[4]	38.93%	100%	$30,000,000	22.27%
Infrastructure	$223,000,000[5]	50.34%	100%	$74,483,950	55.30%
Economic Revitalization	$12,176,534	2.75%	0%	$0	0%
Public Service (15% cap)	$0	0%	0%	$0	0%
Exempt Public Service (no cap)	$0	0%	0%	$0	0%
Planning (15% cap)	N/A	N/A	100%	$13,468,700	10%
Administration (5% cap)	N/A	N/A	N/A	$6,734,350	5%
TOTAL	**$443,008,534**	**100%**		**$134,687,000**	**100%**

The data gathered allows IEDA to identify and prioritize critical unmet needs for long-term community recovery of the impacted areas. The quality of the assessment is directly tied to the quality and completeness of the data that is available and responses received from surveys. The assessment attempts to take into account work already accomplished for the recovery, community goals, and IEDA's capacity to manage and implement the CDBG-DR program.

[3] Unmet need is based on number of renter applicants in FEMA IA data, an average apartment building in MID areas, and median price per square feet.

[4] Unmet need is based on number of owner applicants in FEMA IA data, median home size, median price per square feet, and an assumed withdrawal rate in MID areas.

[5] Based on media reports of infrastructure damage in the northwest Iowa area and also data collected from Iowa HSEM.

The assessment allows IEDA to design recovery programs that are responsive to the actual needs on the ground.

The table below gives losses across all categories (housing, economic development and infrastructure) before and after adjusting for identified funding sources. The unmet needs are calculated by subtracting the resources available from the value of the total damages.

Table 4: Quantified Disaster Impacts and Exacerbated Preexisting Needs of Housing, Infrastructure and Economic Development; Other Financial Assistance; and Remaining Unmet Need

Cost Categories	A. Direct and Indirect Need	B. Financial Assistance Budgeted and Obligated	A Minus B. Unmet Need
Emergency Shelters and Interim and Permanent Housing	$0	$0	$0
Rental Housing	$35,350,000	$0	$35,350,000
Owner-Occupied Housing	$172,482,000	$0	$172,482,000
Public Housing and Other Affordable Housing	$0	$0	$0
Infrastructure	$223,000,000	$0	$223,000,000
Economic Development	$12,176,534	$0	$12,176,534
Public Service	$0	$0	$0
TOTAL	**$443,008,534**	**$0**	**$443,008,534**

2.1. Housing

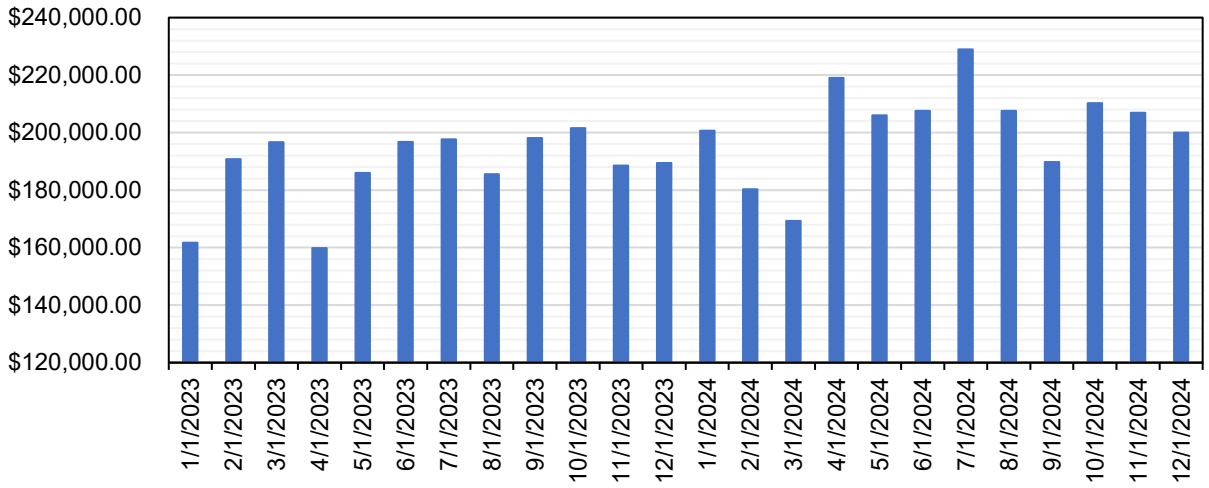
The housing needs assessment uses the following methods: public FEMA data and unmet needs identified by particular stakeholders. The housing unmet needs assessment represents the impact on housing that needs to be rehabilitated, reconstructed or newly built. Like prior Action Plans, IEDA intends to initiate programs that will result in the reconstruction or new construction of homes and rental properties, which will serve the unmet housing needs of the public.

After the disaster, there was a temporary uptick in the median home sale price across the HUD MID areas. This is partly due to having less supply with more demand, pushing housing prices a little higher for properties with or without damage.[6] As work was done to provide more long-term housing for those still displaced, these same areas have seen a noticeable decrease in for-sale

[6] How the Iowa housing market could be impacted in areas with severe storm damage

housing prices in the market.[7] On average, the home sale price has stayed around $200,000 in 2024.

Figure 3: Median Home Sale Price in the Iowa HUD MID Areas



Reference: Redfin Monthly Housing Market Data

It is important to continue the work to get people back into their old homes or provide an option to replace their old dwelling because impacted residents still live in hotels, shelters, with relatives or friends, in campers, or in locations many miles away. Some new construction may be required to fill the gap and support the recovery. In Iowa, the average price for a new home (ranging from 1,500 sq. ft. to 2,500 sq. ft.) could cost anywhere from $250,000 to $450,000.[8] For the reconstruction of a standard 1,600 sq. ft. structure in the Sioux City metro area, the cost per square foot is $170 and the total structure cost would be around $272,106.[9]

Based on media reports and accessible data, over 5,000 homes were damaged as a result of the flooding. From the data reviewed from FEMA, it is clear that Clay County was impacted the most by the flooding. The county consistently had the highest amount of verified losses for owners and renters, the highest number of housing units impacted, and the highest number of homeowners without flood insurance. Like HUD identified, the impacts in Clay are followed by similar impacts in Sioux, Woodbury and Cherokee counties. In some data tables, there seems to be minor indication that Lyon and O'Brien had substantial impacts as well.

[7] Iowa Public Radio - A flooded community in northwest Iowa is in a rush to replace ruined homes

[8] Compiled data from: Home-Cost, Houzeo, Today's Homeowner

[9] Data on cost valuation derived from RS Means Square Foot Cost Estimate Report

The housing data provides the detailed tables about housing applicants impacted by the June 2024 flooding, assistance and losses by owners and renters, flood insurance paid out, and impacts by different housing types.

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

Housing tenure in Iowa is largely skewed toward homeownership, with 71.5% of housing units owner-occupied and 25.8% renter occupied. This reflects a strong culture of homeownership but also points to the need for a balanced housing ecosystem that includes adequate, quality rental options. Renters — who may include students, young professionals, lower-income households and seniors — must have access to stable and affordable housing that supports their specific needs.

Per data from Iowa's Housing Report, the median home rent in Iowa is $949 and the median home value is $195,000. Many Iowan renters and homeowners are either cost burdened (i.e., spending 30% or more of their income on housing) or severely cost burdened (i.e., spending 50% or more of their income on housing). Having a better understanding of which Iowans are the most impacted by housing cost burden assists in identifying opportunities for affordable housing programs and property development after a disaster.

According to the U.S. Census Bureau American Community Survey (ACS) 5-year estimate 2019-2023, around 23.4% of Iowa residents spend 30% or more of their income on housing. Of the total renter-occupied households, data shows that renters are disproportionately burdened by the cost of housing, with 40.2% of renters being considered housing cost burdened. For owner-occupied households, only 16% of homeowners are considered housing cost burdened.

The U.S. Census Bureau ACS 5-year data estimates that the median price of renting will increase steadily over the next seven years. As the median price of rent continues to increase over time, disaster impacts on the housing stock exacerbate this issue. IEDA will consider ways to reduce housing burden as it implements the New Construction Rental Program and the Single Family New Housing Construction Program to the northwest Iowa area.

A comprehensive understanding of Iowa's housing supply requires examining not only the total number of housing units but also where those units are located, who lives in the units, their condition, and their age. As of the most recent data, Iowa has a total of 1,427,175 housing units.[10] However, quantity alone does not capture the full picture of housing needs across the state.

Homeownership has long been recognized as a key pathway to building generational wealth and long-term stability. In Iowa, where a significant 71.5% of housing units are owner-occupied, owning a home is more than a housing choice — it's a cornerstone of economic opportunity.

[10] U.S. Census Bureau ACS 5-year 2019-2023, https://dashboards.mysidewalk.com/housing-report-1d1a2130ca74/housing

However, for most Iowans, homeownership depends on access to mortgage financing, and that access is not guaranteed for everyone.

The mortgage process can be a significant barrier to homeownership, especially for those without established credit, savings or familiarity with lending systems. While 62% of mortgage applications in Iowa are successfully originated, 11% are outright denied. An additional 26.8% fall into other categories such as withdrawn applications, incomplete submissions or pending decisions — representing a considerable share of applicants who begin the process but are unable to complete it. [11] Among current homeowners, nearly 60% still carry a mortgage, while 40.3% own their homes outright. This split reflects longstanding ownership patterns and the stability of many older homeowners, but it also highlights the growing challenges faced by first-time and lower-income buyers who rely on financing to enter the market. Without equitable access to mortgage lending, homeownership remains out of reach for too many Iowans — especially in underserved communities and among populations historically excluded from credit access.

Barriers to mortgage approval may stem from a range of issues: low credit scores, insufficient income or savings, lack of familiarity with the mortgage process, or broader structural inequities within lending institutions. Because we are aware of these challenges, IEDA will look to provide support through down payment assistance for CDBG-DR applicants.

2.1.2 Age and Vacancy of Existing Housing Stock

The age of Iowa's housing stock presents both a challenge and an opportunity. With 1956 as the median year of construction, Iowa has the eighth oldest housing stock in the nation. Many of these older homes require significant upkeep, modernization or full-scale rehabilitation to meet current safety and efficiency standards. In some communities, these aging homes are paired with long-term or indefinite vacancy, signaling areas of disinvestment or population decline. The median residential property value in Iowa is $256,314. [12] Property values are a key indicator of neighborhood health and financial well-being. They are influenced by factors like home condition, occupancy status, and neighborhood investment. Strategic improvements to older or vacant housing stock not only enhance affordability and livability but can also drive appreciation in property values — helping to stabilize communities and increase local revenue.

While Iowa has a substantial base of housing, the current supply does not fully meet the needs of its population. Aging homes, high vacancy rates in some regions, and a limited share of rental housing contribute to unmet housing needs across the state. Critical gaps exist for low- and moderate-income households, renters, and those in areas with limited new development or

[11] *FFIEC HMDA 2023, https://dashboards.mysidewalk.com/housing-report-1d1a2130ca74/housing*

[12] County Tax Assessors 2024, Note: The estimated residential property value is created by ATTOM Data Solutions proprietary Automated Valuation Model (AVM). The AVM calculation uses sales transaction data to capture the local level real estate market changes. The calculation is only for single-family homes and condominiums. Not included are mobile homes, homes on farms/agricultural land, and multi-unit homes.

reinvestment. Through CDBG-DR funding, IEDA can support the development of resilient, updated housing stock in the impacted areas.

2.1.3 Housing Data

Table 5: FEMA IA Owner-Occupied

County	# of Applicants	# of Inspections	# Inspected With Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Buena Vista	58	49	46	46	$470,068.77	$8,104.63
Cherokee	125	94	89	87	$1,754,155.07	$14,033.24
Clay	1,757	1,666	1,587	1,591	$17,907,336.61	$10,192.00
Dickinson	507	465	415	410	$1,297,324.52	$2,558.83
Emmet	386	370	326	326	$1,111,448.16	$2,879.40
Humboldt	61	57	53	52	$480,552.84	$7,877.92
Lyon	602	561	514	513	$2,237,410.52	$3,716.63
Monona	19	17	13	13	$207,989.05	$10,946.79
O'Brien	703	677	661	657	$2,349,763.48	$3,342.48
Osceola	233	218	203	201	$761,015.79	$3,266.16
Palo Alto	120	113	101	101	$447,843.50	$3,732.03
Plymouth	39	34	28	28	$414,917.04	$10,638.90
Pottawattamie	127	80	63	49	$465,431.28	$3,664.81
Scott	116	56	46	40	$320,816.82	$2,765.66
Sioux	912	831	796	791	$17,396,768.85	$19,075.40
Woodbury	232	215	197	197	$2,774,825.35	$11,960.45
TOTAL	**5,997**	**5,503**	**5,138**	**5,102**	**$50,397,667.65**	**$118,755.34**

Reference: FEMA Individual Assistance Dataset, March 2025

Table 6: FEMA IA Tenant Applicants

County	# of Applicants	# of Inspections	# Inspected With Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Buena Vista	24	11	3	4	13,006.80	541.95
Cherokee	96	19	11	11	55,103.34	573.99
Clay	761	666	422	507	1,156,708.85	1,519.99
Dickinson	43	35	20	24	25,590.84	595.14
Emmet	31	26	18	21	23,502.32	758.14
Humboldt	3	3	2	2	3,343.24	1,114.41
Lyon	61	53	31	42	39,451.53	646.75
Monona	4	3	1	1	8,989.74	2,247.44
O'Brien	76	70	52	57	70,620.85	929.22
Osceola	26	26	16	24	26,160.28	1,006.16
Palo Alto	17	12	8	10	12,364.77	727.34
Plymouth	9	6	4	4	8,687.52	965.28
Pottawattamie	57	42	17	16	26,159.95	458.95
Scott	79	54	22	25	32,296.07	408.81
Sioux	258	230	190	184	845,010.16	3,275.23
Woodbury	97	79	35	37	99,301.07	1,023.72
TOTAL	**1,642**	**1,335**	**852**	**969**	**$2,446,297.33**	**$16,792.52**

Reference: FEMA Individual Assistance Dataset, March 2025

Table 7: FEMA IA Applications by Housing Type

County	# of Applicants	% Owner-Occupied	% Tenants	% Unknown	% Type
Apartment	570	0.03%	34.53%	1.54%	7.40%
Assisted Living Facility	14	0.00%	0.85%	0.00%	0.18%
Boat	1	0.02%	0.00%	0.00%	0.01%
Condo	31	0.43%	0.30%	0.00%	0.40%
House/Duplex	6,602	95.48%	50.97%	60.00%	85.70%
Mobile Home	128	1.33%	2.86%	1.54%	1.66%
Other	239	2.08%	5.48%	36.92%	3.10%
Townhouse	101	0.42%	4.63%	0.00%	1.31%
Travel Trailer	18	0.20%	0.37%	0.00%	0.23%

Reference: FEMA Individual Assistance Dataset, March 2025

Table 8: FEMA Real Property Damage – Owner-Occupied Units

County	Major-High	Major-Low	Minor-High	Minor-Low	Severe
Buena Vista	12	2	16	27	1
Cherokee	29	5	21	51	19
Clay	383	133	619	542	80
Dickinson	6	14	110	376	1
Emmet	18	6	66	296	-
Humboldt	5	8	11	33	4
Lyon	29	16	117	431	9
Monona	1	4	3	8	3
O'Brien	15	28	170	490	-
Osceola	5	9	70	149	-
Palo Alto	6	4	31	79	-
Plymouth	10	4	2	21	2
Pottawattamie	5	10	15	94	3
Scott	6	4	10	95	1
Sioux	248	43	129	277	215
Woodbury	55	13	79	67	18
TOTAL	**833**	**303**	**1,469**	**3,036**	**356**

Reference: FEMA Individual Assistance Dataset, March 2025

Table 9: FEMA Real Property Damage – Rental Units

County	Major-High	Major-Low	Minor-High	Minor-Low	Severe
Buena Vista	2	0	1	21	-
Cherokee	4	1	1	87	3
Clay	117	114	102	420	8
Dickinson	1	2	6	34	-
Emmet	0	5	5	21	-
Humboldt	0	1	0	2	-
Lyon	2	3	8	48	-
Monona	0	0	0	3	1
O'Brien	2	11	19	44	-
Osceola	0	4	4	17	1
Palo Alto	1	1	4	11	-
Plymouth	1	1	0	7	-

County	Major-High	Major-Low	Minor-High	Minor-Low	Severe
Pottawattamie	3	2	2	50	-
Scott	1	6	3	69	-
Sioux	87	38	23	82	28
Woodbury	12	7	6	71	1
TOTAL	**233**	**196**	**184**	**987**	**42**

Reference: FEMA Individual Assistance Dataset, March 2025

Table 10: Homeowner With Flood Insurance by County

County	Homeowners Without Flood Insurance	Homeowners With Flood Insurance	Total Homeowners
Buena Vista	58	0	58
Cherokee	106	19	125
Clay	1,691	66	1,757
Dickinson	490	17	507
Emmet	380	6	386
Humboldt	53	8	61
Lyon	584	18	602
Monona	17	2	19
O'Brien	694	9	703
Osceola	229	4	233
Palo Alto	117	3	120
Plymouth	31	8	39
Pottawattamie	114	13	127
Scott	107	9	116
Sioux	855	57	912
Woodbury	216	16	232
TOTAL	**5,742**	**255**	**5,997**

Reference: FEMA Individual Assistance Dataset, March 2025

Iowa residents filed over 85,000 insurance claims to cover roughly $480 million in flooding damage.[13] As the number of claims has increased, homeowners' insurers in Iowa have responded to disaster losses, inflation and rising reinsurance costs by increasing premiums, limiting exposure and adjusting underwriting strategies.[14]

As the data from FEMA IA shows, many disaster applicants do not have flood insurance across all income levels. This data is supported by housing assessments conducted that show while the vast majority of residents have homeowners/property related insurance, the same group does not have flood insurance.[15] Due to the fact that many residents may likely stay in their communities, IEDA will monitor, to the extent feasible, the requirements for flood insurance and the impacts on housing cost burden on residents in the program.

Table 11: Owner-Occupied Units With and Without Homeowners' Insurance by Income

Income Category	Homeowners Without Flood Insurance	Percentage of Total Without Flood Insurance	Homeowners With Flood Insurance	Percentage of Total With Flood Insurance	Total Homeowners
No Stated Income	571	9.52%	21	0.35%	592
< $15,000	232	3.87%	7	0.12%	239
$15,000-$30,000	690	11.51%	23	0.38%	713
$30,001-$60,000	1,556	25.95%	66	1.10%	1,622
$60,001-$120,000	1,900	31.68%	93	1.55%	1,993
$120,001-$175,000	519	8.65%	28	0.47%	547
> $175,000	274	4.57%	17	0.28%	291
TOTAL	**5,742**	**95.75%**	**255**	**4.25%**	**5,997**

Reference: FEMA Individual Assistance Dataset, March 2025

Table 12: NFIP Payments by County

County	# of Homeowners	Payment (for Building)	Payment (for Contents)	Total Payment
Cherokee	15	703,971.15	32,969.51	736,940.66
Clay	54	5,008,623.60	277,546.15	5,286,169.75
Dickinson	8	228,864.99	15,992.25	244,857.24
Emmet	2	28,903.62	2,399.25	31,302.87

[13] Iowans have suffered nearly $550 million so far in damage from 2024 disasters, data shows

[14] Iowa insurers adjust underwriting as homeowners claims soar

[15] City of Spencer Residential Flooding Assessment and Impact Report – November 2024

County	# of Homeowners	Payment (for Building)	Payment (for Contents)	Total Payment
Lyon	13	390,175.17	17,610.68	407,785.85
Monona	5	106,343.26	1,330.70	107,673.96
O'Brien	1	101,533.70	20,406.61	121,940.31
Osceola	2	21,352.38	–	21,352.38
Palo Alto	1	19,869.67	10,000.00	29,869.67
Plymouth	6	339,018.40	12,593.29	351,611.69
Pottawattamie	9	638,019.26	7,344.88	645,364.14
Scott	20	214,579.65	54,978.34	269,557.99
Sioux	25	3,291,885.21	408,758.20	3,700,643.41
Woodbury	16	625,386.89	30,000.00	655,386.89
TOTAL	**177**	**$11,718,526.95**	**$891,929.86**	**$12,610,456.81**

Reference: AY0000Y2 – FIMA National Flood Insurance Program Data File

Table 13: Manufactured Housing Units Impacted by Disaster

County	# of Units	% of Total Units in County	Unmet Need
Cherokee	1	1.61%	–
Clay	12	10.26%	–
Dickinson	7	1.72%	–
Emmet	7	5.69%	7,378
Humboldt	1	0.95%	–
Lyon	2	2.53%	–
Monona	1	0.77%	–
O'Brien	1	0.79%	3,446
Palo Alto	2	20.00%	–
Plymouth	1	0.28%	–
Pottawattamie	7	0.43%	–
Scott	6	0.38%	5,981
Sioux	60	18.02%	168,841
Woodbury	20	1.29%	–
TOTAL	**128**	**1.95%**	**$ 185,646**

Reference: FEMA Individual Assistance Dataset, March 2025

Table 14: Total Verified Loss, Home Loans Approved and Home Loans Disbursed by SBA

The SBA provides low-interest loans to homeowners who have suffered damage from natural disaster events in order to help the homeowner recover more swiftly. After a homeowner applies for a loan from the SBA, the loan undergoes an approval process and, upon approval of the loan application, an amount is determined and presented to the applicant. From here, the homeowner can accept the terms of the loan or decide to cancel their loan and decline the funds.

Per data received from SBA, for applicants who have submitted or completed an application, $48 million was recorded as the total verified loss across all impacted counties. Of that amount, $24 million in loans was issued. Sioux and Clay counties had the most home loans issued (each at 40%) and the highest amount of home loans.

County	# of Loans	Total Verified Loss	Current Loan Amount	Total Amount Disbursed
Buena Vista	6	764,757	563,100	563,100
Cherokee	3	650,578	348,600	348,600
Clay	158	13,157,477	6,059,234	5,818,660
Dickinson	12	1,055,237	754,071	471,119
Emmet	8	423,112	423,400	423,400
Humboldt	3	158,203	136,400	136,400
Lyon	19	1,626,057	642,476	559,652
O'Brien	9	408,951	388,938	357,881
Osceola	6	279,735	265,000	265,000
Palo Alto	5	242,854	238,600	238,600
Plymouth	3	426,132	331,200	331,200
Pottawattamie	3	133,682	75,000	75,000
Sioux	159	28,366,467	14,094,555	12,134,467
Woodbury	6	603,303	361,000	335,943
TOTAL	**400**	**$48,296,545.83**	**$24,681,574.17**	**$22,059,022.38**

Reference: SBA Data on Disaster Home Loan Applications – April 2025

2.1.4 Public Housing and Other Affordable Housing

HUD's Multifamily Housing property portfolio consist primarily of rental housing properties with five or more dwelling units, such as apartments or town houses, but can also include nursing homes, hospitals, elderly housing, mobile home parks, retirement service centers and, occasionally, vacant land. HUD provides subsidies and grants to property owners and developers in an effort to promote the development and preservation of affordable rental units for low-income populations and those with special needs, such as the elderly and disabled.

The portfolio can be broken down into two basic categories: insured and assisted. The three largest assistance programs for Multifamily Housing are Section 8 Project Based Assistance, Section 202 Supportive Housing for the Elderly, and Section 811 Supportive Housing for Persons with Disabilities.

Table 15: Multifamily HUD-Assisted Housing

County	# of Properties	# of Units	# of Units Assisted	# of Units Awaiting Assistance
Cherokee	1	62	62	0
Clay	4	143	142	1
Sioux	6	128	128	0
Woodbury	14	996	989	7
TOTAL	**25**	**1,329**	**1,321**	**8**

Reference: HUD Open Data - HUD's Assisted Multifamily Housing Properties, February 2025

Some of the HUD-assisted housing was impacted by the June 2024 flooding. Hawarden (in Sioux County) residents were hit by the flooding.[16] Below, you will see information and data collected on housing choice vouchers (HCVs) for impacted units, impacts to Low-Income Housing Tax Credit (LIHTC) units and public housing dwelling units, and details about impacts to residents in particular counties.

Northwest Iowa Regional Housing Authority

The Northwest Iowa Regional Housing Authority provides affordable housing across northwest Iowa (Buena Vista, Cherokee, Clay, Dickinson, Emmet, Ida, Lyon, Monona, O'Brien, Osceola, Palo Alto, Plymouth, Sioux and Woodbury). While the Public Housing Agency (PHA) was not directly damaged in the flood, the PHA is tracking impacts to multifamily buildings and renters receiving housing assistance (receiving an HCV voucher) in the area.

- Two multifamily units in Hawarden (Sioux County) were damaged heavily by the flooding. They can't continue to operate and are converting to HCV payments for housing assistance.
- In Sioux County, 19 tenants receiving HUD assistance lost their homes and had to be rehoused.
- In Lyon County, 1 tenant receiving HUD assistance was able to move to an upstairs unit.
- In Cherokee County, 1 tenant was temporarily displaced from their home.
- In Buena Vista County (all Sioux Rapids), 3 tenants needed to relocate but were able to move back once repairs were completed.

[16] Flood creates housing crisis in Hawarden

- In O'Brien County, 3 tenants were displaced temporarily while repairs were made and clean up was done.
- In Clay County, 97 tenants were displaced, some were rehoused, and many are still in hotels or FEMA trailers.

Sioux City Housing Authority

Sioux City Housing Authority administers the Section 8 Housing Choice Voucher Program.

- It currently administers 1,221 vouchers plus an Emergency Housing Program of 21 participants.
- During the June 2024 flood, 5 program participants were impacted and had to temporarily move out of their unit while flood damage repair was completed.

Table 16: HUD-Assisted Housing Impacted by Disaster

County	Total HCVs	Total Impacted HCV Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Buena Vista	0	0	0	0	0	0	0
Cherokee	0	1	0	0	0	0	0
Clay	199	97	0	0	0	0	0
Lyon	0	1	0	0	0	0	0
O'Brien	0	3	0	0	0	0	0
Sioux	34	19	0	0	0	0	0
Woodbury	1,130	0	0	0	0	0	0
TOTAL	**1,363**	**121**	**0**	**0**	**0**	**0**	**0**

Reference: HUD Open Data - Housing Choice Vouchers by Tract, March 2025, HUD's Low-Income Housing Tax Credit Database

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high-rise apartments for elderly families. HUD administers federal aid to local PHAs that manage housing for low-income residents at rents they can afford.

There is no data currently available on units damaged for the three PHAs in the disaster-impacted areas.

Table 17: PHAs Damaged

County	PHA Name	PHA Code	# of Units	Units Damaged
Clay	Northwest Iowa Regional Housing Authority	IA129	1,059	–
Sioux	Low Rent Housing Agency of Sioux Center	IA011	71	–
Woodbury	Sioux City Housing Authority	IA018	1,221	–

Reference: HUD PHA Contact Report for Iowa, HUD Open Data - Public Housing Authorities, March 2025

IEDA made attempts to coordinate with local public housing authorities (PHA) in the MID areas to ensure that the action plan reflects the input of those entities and to make sure that all funding sources that are available and opportunities for leverage are noted in the action plan. Through outreach no significant need was identified.

2.1.5 Emergency Shelters and Interim and Permanent Housing

The data in the tables below is based on point-in-time information provided to HUD by Continuums of Care (CoCs) as part of their CoC Program application process. CoCs are required to provide an unduplicated count of homeless persons according to HUD standards, and HUD annually publishes reports that show the CoC geographic areas, geographic coverage changes from the previous program year, information on each CoC's awards by award amount, project component type, and project application type. The reports also contain summary data from the Point-in-Time (PIT) count and Housing Inventory Count (HIC), which provide an overview of a CoC's performance in serving homeless individuals with their CoC awards.

Table 18: Affected CoC Entities

CoC Number	CoC Entity	Impacted County	Homeless Count
IA-500	Sioux City/Dakota, Woodbury Counties CoC	Woodbury	295
IA-501	Iowa Balance of State CoC	Clay	0
IA-501	Iowa Balance of State CoC	Cherokee	0
IA-501	Iowa Balance of State CoC	Sioux	10

Reference: 2024 Point in Time Count – Iowa Institute for Community Alliances (ICA), HUD's CoC Dashboard Reports, HUD's CoC Homeless Populations and Subpopulations Reports

Table 19: PIT Count – Impacted by Disaster & Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	0	2,305	580	2,885
FEMA Declared	0	927	165	1,092

MID Areas	0	281	24	305

Reference: 2024 Point in Time Count – Iowa Institute for Community Alliances (ICA)

2.2. Infrastructure

From reports and assessments done in 2024, it has been reported that the continuous flooding and storms caused an estimated $130 million in infrastructure damages.[17] Clay and Sioux counties were impacted such that the frequent rain events brought river levels to the breaking point, creating levee failures and sending flood waters over their banks. They included the Rock, Floyd and West Branch of the Floyd River in Sioux County, and the Little Sioux and Ocheyedan rivers near Spencer in Clay County, along with other contributing smaller rivers and creeks that were also deluged with rainwater.

In addition, there have been recorded damages to rural roads, secondary roads, bridges and culverts, bridge embankments, and pastures and cropland. As stated in some assessments, this situation presents an opportunity to address existing infrastructure weaknesses and make updates to storm sewer and wastewater systems to prevent future flooding.[18]

FEMA's PA Program provides supplemental grants to state, tribal, territorial, and local governments, and certain types of private non-profits so communities can quickly respond to and recover from major disasters or emergencies. Below are details on what type of activities are being funded by FEMA and the remaining unmet need (non-federal share).

FEMA PA data shows that most activity was either done for preparing or responding to the disaster, repairing damaged public facilities, or repairing damaged roads and bridges. Unsurprisingly, Clay County had the highest amount of reported FEMA assistance needed, mostly for emergency measures.

While the data from FEMA PA appears to show limited unmet need, IEDA has worked with Iowa Homeland Security and Emergency Management (HSEM) and other local entities to assess their unrecorded unmet need. For PA, it is reported that there is $305 million in projected costs needing $76 million in local match funding (possibly from CDBG-DR).

A combination of consultations with the community, survey responses, and data from HSEM show evidence that there is a need for the CDBG-DR funding to prioritize infrastructure. Various types of infrastructure recovery will be needed: construction of infrastructure to accommodate new housing, infrastructure repair for what was damaged, and mitigation measures for facilities and infrastructure from future disasters.

Several communities reported that the loss and damages to certain public facilities will require a significant investment. The financial costs can be a significant barrier, and even with assistance

[17] UNI's Business & Community Services gathers, leverages data to assist in Iowa storm response

[18] City of Spencer Residential Flooding Assessment and Impact Report – November 2024

from FEMA and other sources, the repair and mitigation costs for the community will be overwhelming and unaffordable for residents, a majority of whom are low to moderate income.

In other communities, residents reported that infrastructure like sewers and lift stations failed at critical points, resulting in damage that could have been prevented to homes. Per the data and community feedback, infrastructure repair and mitigation needs to be addressed as a critical need and will support both the construction of new housing and the overall resilience of the communities.

Lastly, in summer 2024, the State of Iowa provided substantial funding through two programs to assist with housing repair and redevelopment due to flooding and tornado events. The State Disaster Recovery New Housing program provided $10 million for the construction of new single-family and multifamily housing units in an effort to address the loss of housing units from 2024 weather events.[19] The Disaster Recovery Housing Assistance Program provided $18 million to assist homeowners with post-disaster housing rehabilitation costs.[20] These funds helped cover a lot of the housing needs that were seen in the impacted areas; leaving infrastructure is a remaining priority.

Table 20: FEMA Public Assistance Program

PA Category	# of Projects	Project Cost	Federal Share	Non-Federal Share
A – Debris Removal	8	83,847.17	62,885.39	20,961.78
B – Emergency Protective Measures	17	4,109,823.22	3,082,367.48	1,027,455.74
C – Roads and Bridges	9	243,806.98	182,855.26	60,951.72
D – Water Control Facilities	1	20,212.00	15,159.00	5,053.00
E – Buildings and Contents	1	252,959.60	189,719.70	63,239.90
F – Utilities	3	118,846.59	89,134.96	29,711.63
G – Parks, Recreational Facilities and Other Items	4	92,297.74	69,223.31	23,074.43
TOTAL	**43**	**$4,921,793.30**	**$3,691,345.10**	**$1,230,448.20**

Reference: FEMA Public Assistance Dataset, March 2025

Table 21: FEMA Public Assistance Program by County and Category

County	A	B	C	D	E	F	G	Total
Buena Vista County		7,045						7,045
Cherokee County			12,836					12,836
Clay County	1,495	798,133	10,080				15,853	825,562

[19] State Disaster Recovery - New Housing

[20] Disaster Recovery Temporary Housing Program (DRTHP)

County	A	B	C	D	E	F	G	Total
Des Moines County		160,252						160,252
Dickinson County	1,084	5,324					3,084	9,492
Harrison County					63,240			63,240
Humboldt County			2,592	5,053				7,645
Kossuth County		2,807					1,425	4,232
Lyon County			1,168					1,168
Osceola County	2,743							2,743
Palo Alto County		4,471				7,386		11,857
Plymouth County		18,433						18,433
Pocahontas County	1,125		6,976					8,101
Pottawattamie County		22,281					2,713	24,994
Sioux County	2,733					2,180		4,913
Statewide		6,192				20,146		26,338
Winnebago County	8,750	2,517	16,077					27,343
Winneshiek County	1,698							1,698
Worth County	1,334		11,223					12,557
TOTAL	**$20,962**	**$1,027,456**	**$60,952**	**$5,053**	**$63,240**	**$29,712**	**$23,074**	**$1,230,448**

Reference: FEMA Public Assistance Dataset, March 2025

Table 22: FEMA Hazard Mitigation Grant Program

There was no substantial data received regarding the FEMA Hazard Mitigation Grant Program, but IEDA was able to receive information from HSEM about potential hazard mitigation projects. For the disaster, HSEM is estimating about $70 million worth of projects needing about $17 million in local match funding (possibly from CDBG-DR).

2.3. Economic Revitalization

Following the June 2024 flooding and the presidential declaration of a major disaster for the State of Iowa, SBA issued the disaster number, IA–20005, to capture all loans for physical damage and economic injury. For Iowa, SBA identified the following areas as impacted and qualifying for these loans: Buena Vista, Cherokee, Dickinson, Kossuth, O'Brien, Osceola, Palo Alto, Pocahontas and Woodbury.

In addition to home loans, SBA also provides disaster loans to businesses to cover losses not covered by insurance or funding from FEMA and business operating expenses that could have been met had the disaster not occurred.

In some impacted areas, businesses reported damage to buildings, loss of inventory and reduced sales (due to customers moving out of the area because of lack of housing or jobs). The main concern for businesses would be to make sure they can continue to operate in the same location and maintain the economic stability of those communities.[21]

The tables below show the dollar amount associated with businesses in their respective counties and a breakdown of business type and count. IEDA does not anticipate funding activities for businesses or economic revitalization at this time. However, funding for infrastructure work can help maintain foot traffic to these businesses and mitigate future flooding.

SBA's Economic Injury Disaster Loan (EIDL) program is available to small businesses, small agricultural cooperatives, nurseries and Private Non-Profit Organizations (PNPs) with financial losses directly related to the disaster. EIDLs are available for working capital needs caused by the disaster and are available even if the business or PNP did not suffer any physical damage. The loans may be used to pay fixed debts, payroll, accounts payable and other bills not paid due to the disaster.

Table 23: Total Business Loans Disbursed by the SBA

County	# of EIDLs Disbursed	Total EIDLs Disbursed
Buena Vista	2	50,000
Cherokee	4	45,800
Clay	58	2,031,417
Dickinson	3	124,862
Emmet	2	11,500
Lyon	9	243,962
O'Brien	3	50,000
Plymouth	3	341,200
Pocahontas	1	18,000
Scott	1	25,000
Sioux	41	1,595,457
Woodbury	6	1,042,634
TOTAL	**133**	**$5,579,832**

Reference: SBA Data on Disaster Business Loan Applications – April 2025

Table 24: Total Business Loans Approved by the SBA by Business Category

[21] City of Spencer Business Relocation Survey – January 2025

Business Category/NAICS Industry	# of EIDL Disbursed	Total EIDL Disbursed
All Other Miscellaneous Retailers	4	90,000
All Other Miscellaneous Textile Product Mills	1	700
All Other Personal Services	1	25,000
All Other Specialty Trade Contractors	1	68,200
Beauty Salons	7	74,700
Car Washes	1	18,000
Child Care Services	1	4,900
Coin-Operated Laundries and Drycleaners	1	1,300
Cosmetics, Beauty Supplies, and Perfume Retailers	1	121,217
Couriers and Express Delivery Services	1	25,000
Electrical Contractors and Other Wiring Installation Contractors	1	5,800
Electronics and Appliance Retailers	1	73,400
Farm Management Services	1	40,000
Fitness and Recreational Sports Centers	3	75,000
Floor Covering Retailers	1	25,000
Flooring Contractors	1	25,000
Food (Health) Supplement Retailers	1	700
Full-Service Restaurants	9	429,100
Furniture Retailers	2	125,000
General Automotive Repair	2	105,662
General Freight Trucking, Local	3	1,108,496
Gift, Novelty, and Souvenir Retailers	2	177,000
Golf Courses and Country Clubs	1	20,800
Home Furnishing Merchant Wholesalers	1	4,500
Home Health Care Services	1	3,700
Hotels (except Casino Hotels) and Motels	2	400,000
Independent Artists, Writers, and Performers	1	1,300
Industrial Building Construction	1	188,900
Lessors of Nonresidential Buildings (except Mini warehouses)	1	16,000
Lessors of Other Real Estate Property	1	5,300
Lessors of Residential Buildings and Dwellings	35	311,300
Limited-Service Restaurants	1	25,000
Mobile Food Services	1	4,200

Business Category/NAICS Industry	# of EIDL Disbursed	Total EIDL Disbursed
Motion Picture Theaters (except Drive-Ins)	1	244,200
Motorcycle, ATV, and All Other Motor Vehicle Dealers	1	96,900
Offices of All Other Miscellaneous Health Practitioners	1	1,800
Offices of Certified Public Accountants	1	25,000
Offices of Chiropractors	1	135,400
Offices of Mental Health Practitioners (except Physicians)	1	4,500
Offices of Optometrists	1	65,000
Offices of Real Estate Agents and Brokers	1	17,700
Other Building Material Dealers	2	791,200
Other Personal and Household Goods Repair and Maintenance	3	51,600
Other Warehousing and Storage	3	2,700
Painting and Wall Covering Contractors	1	3,000
Petroleum and Petroleum Products Merchant Wholesalers	1	22,500
Poured Concrete Foundation and Structure Contractors	1	11,100
Process, Physical Distribution and Logistics Consulting Services	1	7,000
Religious Organizations	1	22,200
Rendering and Meat Byproduct Processing	1	249,357
Residential Property Managers	11	30,000
Residential Remodelers	1	4,000
Specialized Freight (except Used Goods) Trucking, Local	1	19,600
Sports and Recreation Instruction	1	5,000
Stationery Product Manufacturing	1	80,300
Used Merchandise Retailers	1	19,600
Veterinary Services	3	70,000
TOTAL	**133**	**$5,579,832**

Reference: SBA Data on Disaster Business Loan Applications – April 2025, SBA Table of Size Standards

The table below demonstrates the increased occupation demands in Iowa as well as employment projections and expected job sector growth.

Table 25: Statewide Increased Occupation Demands

Occupation	Currently Employed	Projected Employment	Projected Growth	Projected Growth %	Total Job Openings
Architecture & Engineering Occupations	22,140	24,315	2,175	98.2%	215
Arts, Design, Entertainment, Sports, & Media Occupations	26,445	28,420	1,970	74.5%	195
Building & Grounds Cleaning & Maintenance Occupations	57,985	61,390	3,410	58.8%	340
Business & Financial Operations Occupations	91,640	98,850	7,210	78.7%	720
Community & Social Service Occupations	24,440	28,280	3,840	157.1%	385
Computer & Mathematical Occupations	42,395	48,100	5,705	134.6%	570
Construction & Extraction Occupations	85,995	94,785	8,790	102.2%	880
Educational Instruction & Library Occupations	123,765	133,410	9,645	77.9%	965
Farming, Fishing, & Forestry Occupations	19,880	19,535	-345	-17.4%	-35
Food Preparation & Serving Related Occupations	127,120	131,560	4,440	34.9%	445
Healthcare Practitioners & Technical Occupations	96,475	109,135	12,660	131.2%	1,265
Healthcare Support Occupations	65,045	77,620	12,580	193.4%	1,260

Occupation	Currently Employed	Projected Employment	Projected Growth	Projected Growth %	Total Job Openings
Installation, Maintenance, & Repair Occupations	74,515	81,535	7,020	94.2%	700
Legal Occupations	8,845	9,485	645	72.9%	65
Life, Physical, & Social Science Occupations	15,480	16,960	1,485	95.9%	150
Management Occupations	190,425	198,835	8,410	44.2%	840
Office & Administrative Support Occupations	205,320	199,335	-5,990	-29.2%	-600
Personal Care & Service Occupations	46,295	50,670	4,380	94.6%	440
Production Occupations	151,535	155,390	3,855	25.4%	385
Protective Service Occupations	24,500	25,500	1,000	40.8%	100
Sales & Related Occupations	164,410	167,095	2,685	16.3%	270
Transportation & Material Moving Occupations	173,050	190,905	17,855	103.2%	1,785

Reference: Iowa Workforce Development Occupational Projections - Long-Term Data (2022-2032)

2.4. Public Service

As of June 2025, IEDA does not plan to fund any Public Service activities for this disaster.

3. Mitigation Needs Assessment

3. Mitigation Needs Assessment

3.1. Overview

In accordance with HUD guidance, the State of Iowa completed the following Mitigation Needs Assessment. The state reviewed existing hazard plans, and past Action Plans of the state's earlier CDBG-DR grants recently approved by HUD, to develop a multi-hazard risk-based Mitigation Needs Assessment. This assessment informs and provides a substantive basis for mitigation activities proposed in this Action Plan, with a focus on addressing and analyzing all significant current and future hazard risks.

This mitigation needs assessment analyzes statewide risks with specific sections detailing hazards in the most impacted areas.

There have been 51 presidentially declared disasters in the State of Iowa since 1990.[22] The most common natural disasters that cause damages to an extent that result in a federal disaster declaration are severe storms, flooding, tornadoes, straight-line winds and ice storms. Since 1991, there have been 33 declared severe storm-related disasters (excluding severe winter storms) and 18 tornado-related disasters. This historical pattern of extreme weather is expected to continue and become more severe due to increasing hazards. Based on this, mitigation measures to reduce impacts caused by these types of hazards are critical.

Every county in the state has been impacted by one or more of these events, which have resulted in the devastating loss of life and hardship of Iowa residents, forcing many to relocate, exhaust their financial assets, and undermine the security of living in their homes or investing in their properties or businesses. Flood loss insurance claims are particularly costly with 10,275 claims totaling over $341,964,905.74 since 1991.[23]

This assessment will provide a basis upon which to propose programs and projects as part of this plan that will mitigate current and future hazards. In addition, it will inform all projects undertaken through CDBG-DR such that, at a minimum, they do not exacerbate natural hazard threats and make use of scarce resources for recovery and mitigation.

As part of this assessment, the state also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions, and/or are critical to human health and safety and economic security.

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[22] Iowa Disaster History, Iowa HSEM, n.d., https://homelandsecurity.iowa.gov/disasters/iowa-disaster-history#:~:text=Iowa%20has%20experienced%2051%20presidentially%20declared%20disasters%20from%201990%20to%202024.

[23] Historical NFIP Claims Information and Trends, National Flood Insurance Program, 2024, https://www.floodsmart.gov/historical-nfip-claims-information-and-trends?map=countries/us/us-ia-all&region=us-ia&miny=1991&maxy=2024&county=&gtype=state

Table 26: CDBG-DR Mitigation Set-Aside Needs Assessment

Categories Affected	A. Total Need	B. Financial Assistance Budgeted and Obligated	A - B. Unmet Need
Housing	$0.00	$0.00	$0.00
Infrastructure	17,568,000	$0.00	$17,568,000
Economic Development	$0.00	$0.00	$0.00
Total	**$17,568,000**	**$0.00**	**$17,568,000**

3.1.1 Past Mitigation Projects

Since 2008, more than $650 million has been spent on hazard mitigation projects throughout the state of Iowa. Hazard Mitigation Assistance programs have focused efforts on three primary areas: acquisition and relocation of structures in flood hazard areas; infrastructure projects for flood control and stormwater management; and hardening of rural electrical infrastructure to better withstand ice, snow and wind storms. Acquisition projects across the state have resulted in significant savings, avoiding millions of dollars in potential losses from subsequent flooding. Since 2018, 340 properties, including residential and business structures, have been permanently removed from the floodplain using federal funding granted to Iowa as the result of Presidential Disaster Declarations and annual Hazard Mitigation Assistance programs. The estimated reduction in damages from flooding events that occurred during the same period was $187 million, due to the conversion of over 1,000 properties to open space. The damage to residences and small businesses from the 2024 flooding is estimated to have been reduced by $8 million due to prior property acquisition initiatives, which mitigated 206 properties. Since 2008, 3,362 structures have been permanently removed from the floodplain.

3.1.2 Building Resilient Infrastructure and Communities (BRIC)

HSEM is responsible for the administration of FEMA's competitive pre-disaster mitigation grant program, Building Resilient Infrastructure and Communities (BRIC). The program has provided millions of dollars in funding for hazard mitigation. With these funds, FEMA and the State of Iowa have been concentrating their efforts on large-scale, cutting-edge projects designed to mitigate a range of hazards that affect various community infrastructure. In August 2023, the City of Coralville was awarded $19.6 million for an electrical grid resiliency project. Furthermore, Denison Municipal Utilities was chosen for a competitive project with a total value of $14 million. A total of 12 BRIC 2023 capability and capacity-building and planning grants were awarded, with a combined value of $2 million. Capability and capacity building activities result in the creation of resources, strategies, or tangible mitigation products that will reduce or eliminate risk and damage from future natural hazards, increase resiliency, and promote a culture of preparedness. Currently, the BRIC program is canceled for all BRIC applications from fiscal

years 2020 to 2023. Grant funds that have not been distributed will be returned.[24] If the program is restarted or funds are made available through another route, the funds will be crucial to Iowa's mitigation efforts in the state.

3.1.3 Increasing Hazards

"Increasing hazards" is a term used to categorize significant variations in expected weather events ranging from extreme temperatures, weather occurrences outside of average date ranges for that specific weather, and weather events not typical for a given geographic location. Iowa would do well to start adapting today to the future that climate trends and projections depict, which is one of more frequent and more intense natural disasters. An accurate projection will be nuanced, however, in that not all natural disasters are getting worse equally across the state, and some are not necessarily worsening at all. To prepare for and mitigate the effects of increasing hazards on Iowa's prosperity, culture and natural resources, planners considering future conditions should take the potential effects of increasing hazards into account.

Trend lines for *observed* temperature, humidity, and precipitation suggest long-term increases in all three. Increasing hazards are more than a mere increase in average temperatures. It can affect all aspects of life in Iowa, no matter one's location or lifestyle. Natural hazard risks, agriculture, outdoor recreation, cost of living, migration of plants and animals, human migration — all can be impacted. The economic impacts of increasing hazards alone would make natural hazards more difficult to deal with. The Fourth National Climate Assessment notes that the southern Midwest (including part of Iowa) is projected to lose 5% to 25% of its current corn and over 25% of its soybean yield by 2050.[25] With agricultural production and processing industries representing 9.3% of Iowa's GDP,[26] much of which is dependent on these two crops, these projected impacts on Iowa's economy are serious.

Since the beginning of the 20th century, average temperatures in Iowa have increased by over 1°F. If this trend continues, some of Iowa's natural hazards are expected to increase in frequency and intensity. The atmosphere acts like a sponge, and the warmer it is, the bigger it gets and the more moisture it can hold. Consequently, it pulls more moisture from plants and soil, primarily in the summer when temperatures are higher. The atmosphere's ability to hold more moisture also means that it takes more moisture to cause a precipitation event, which in

[24] FEMA Ends Wasteful, Politicized Grant Program, Returning Agency to Core Mission of Helping Americans Recovering from Natural Disasters: https://www.fema.gov/press-release/20250404/fema-ends-wasteful-politicized-grant-program-returning-agency-core-mission

[25] USGCRP, 2018: *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II,* Chapter 21: Midwest," Agriculture", [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, doi: 10.7930/NCA4.2018, https://nca2018.globalchange.gov/chapter/21/

[26] Division of Agriculture, University of Arkansas, Economic Impact of Agriculture: Iowa, https://economic-impact-of-ag.uada.edu/iowa/ (2020)

turn means that the time between events is increased (more droughts), and the potential for high-intensity precipitation is increased (more floods).

3.2. Greatest Risk Hazards

Analysts identified the "greatest risk hazards" as hazards with the highest damage costs and the highest frequencies of occurrence as designated by the NOAA National Centers for Environmental Information (NCEI) 2025 data.

Table 27: Billion-Dollar Events to Affect Iowa, 1980-2024 (CPI-Adjusted)

Disaster Type	Events	Events/Year	Percentage Frequency	Total Costs	Percentage of Total Costs
Flooding	8	0.2	9.3%	$20B-$50B	38.3%
Severe Storm	57	1.3	66.3%	$20B-$50B	35.7%
Drought	16	0.4	18.6%	$10B-$20B	25.5%
Winter Storm	3	0.1	3.5%	$100M-$250M	0.4%
Freeze	2	0.0	2.3%	$5M-$10M	0.1%
All Disasters	86	1.9	100.0%	$50B-$100B	100.0%

Source: NOAA NCEI, U.S. Billion-Dollar Weather and Climate Disasters (2025).

To align the NCEI data above with the State of Iowa's Hazard Mitigation Plan, this Action Plan will include freeze/extreme cold events within the winter storm hazard profile, and separate the tornado hazard profile from the severe storm profile as this hazard has historical significance and relevance when considering the impact of DR-4796-IA.

The greatest risk hazards identified are:

- Flooding
- Severe storm
- Tornado and high wind
- Drought
- Winter storm

3.2.1 Hazard Probabilities

For many of the natural hazards, the best available data with which to estimate probability is often based on past events. Though certainly not the only source of past event data, a key source for this information comes from the NCEI Storm Events Database. NCEI data was analyzed for dam and levee failure, drought, extreme/excessive heat, riverine flooding, flash flooding, winter weather, hail, lightning, tornadoes and wind. As NCEI information is used for so

many hazards, it is important to note the following about the information in the NCEI Storm Events Database:[27]

- From 1950 through 1954, only tornado events were recorded.
- From 1955 through 1992, only tornado, thunderstorm, wind and hail events were keyed from the paper publications into digital data.
- From 1993 to 1995, only tornado, thunderstorm, wind and hail events have been extracted from the unformatted text files.
- From 1996 to present, 48 event types were recorded as defined in NWS Directive 10-1605.

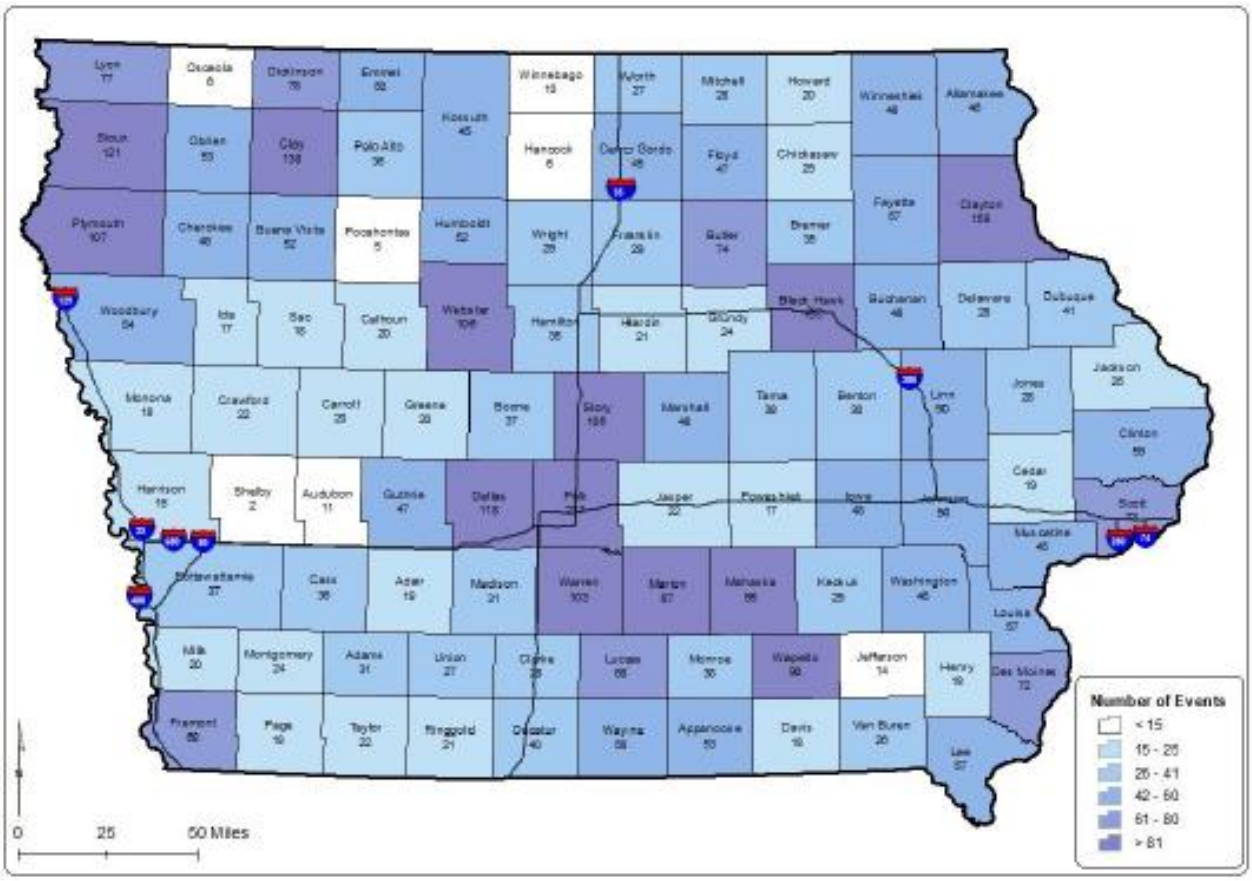
3.2.2 Flooding

While the hazards of flash flooding and riverine flooding are often designated separately, they will be briefly discussed together because often people will just refer to "flooding," especially when referring to the damage they cause, and no distinction is made whether the flood event was riverine or flash. In fact, FEMA disaster declarations usually do not designate in the title of a disaster whether flooding was flash or riverine. In the following subsections, riverine and flash flooding will be discussed separately.

Floods are the most common and widespread of all natural disasters in Iowa. In the last 30 years, every county in the state of Iowa received at least five Presidential Disaster Declarations that included flooding.

[27] Storm Event Database of the National Centers for Environmental Information. https://www.ncdc.noaa.gov/stormevents/

Figure 4: Flash and Riverine Flood Events 2007-2022, Including Snow Melt, Ice Jams and Dam/Levee Failures



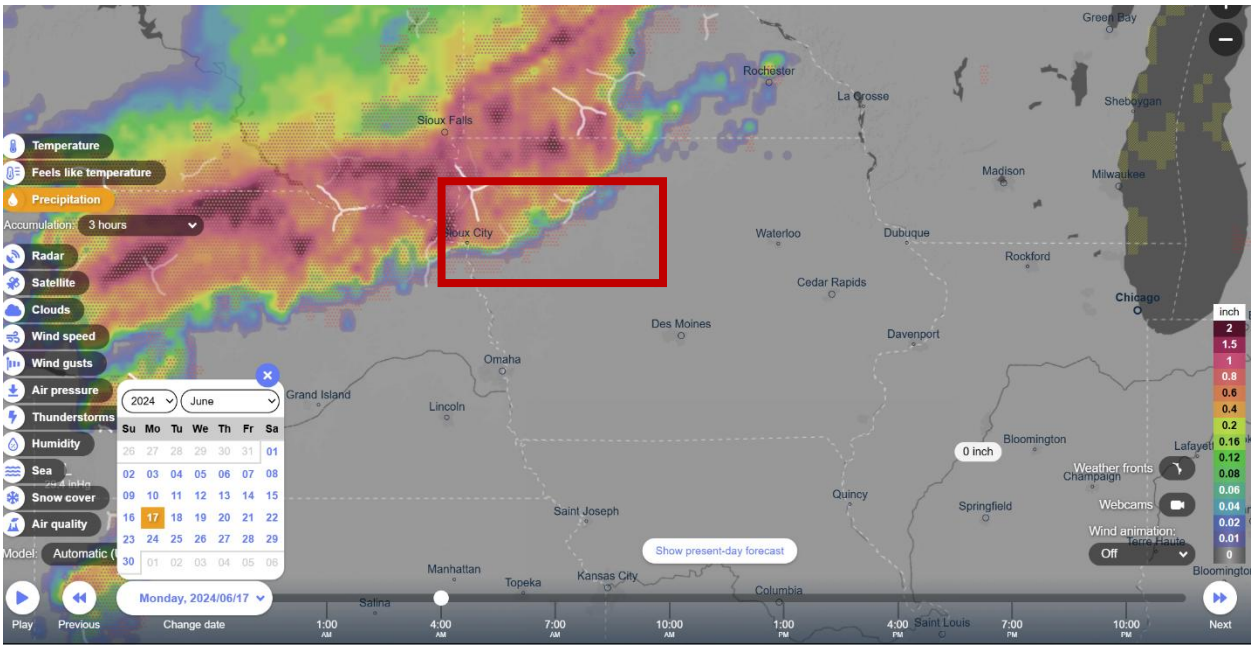
Source: NCEI Storm Events Database

Figure 4 shows the number of flood events in each county in Iowa for the years 2007 through 2022. The map includes events from any type of flood, whether flash or riverine, and from any cause, whether from storms, snow melt, ice jams, or even dam or levee failures. According to the NCEI data, flooding caused over 131 injuries and 8 deaths in that period.

3.2.3 Flash Flooding

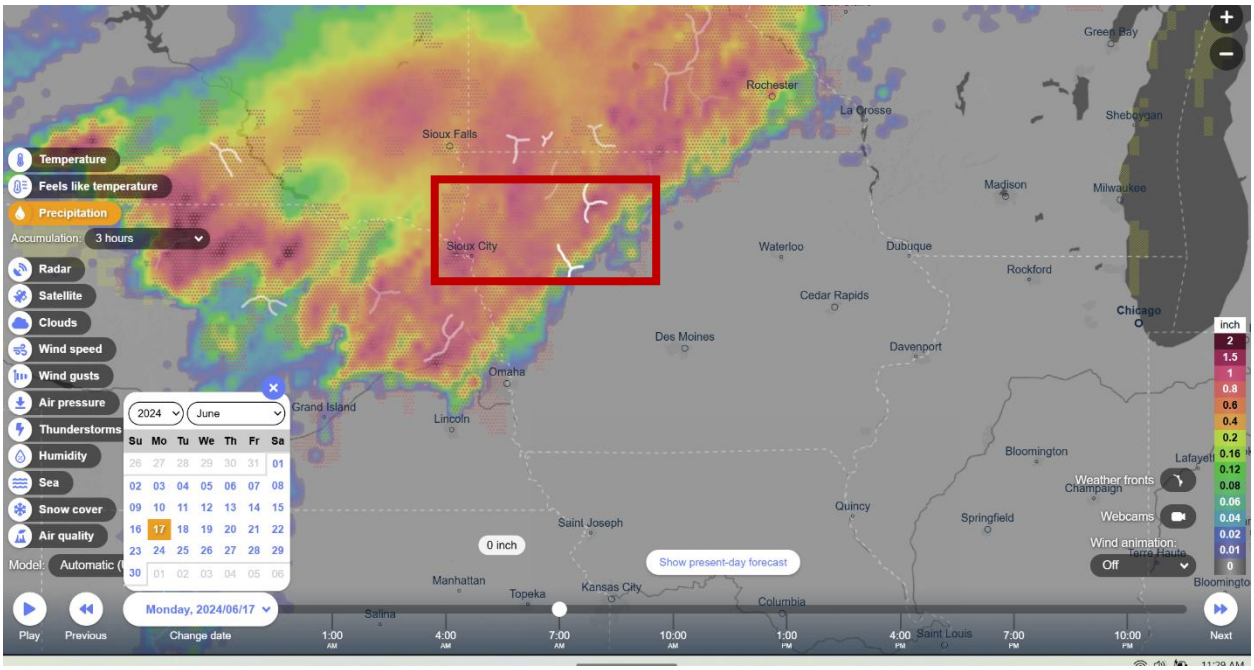
A flash flood is an event that occurs with little or no warning where water levels rise at an extremely fast rate. Flash flooding results from intense rainfall over a brief period, sometimes combined with rapid snowmelt, ice jam release, frozen ground, saturated soil or impermeable surfaces. Most flash flooding is caused by slow-moving thunderstorms or thunderstorms repeatedly moving over the same area. Figures 5 and 6 show inches of precipitation at 4:00 a.m. and 7:00 a.m. Central Standard Time on June 17, 2024, over the disaster-impacted region of the State of Iowa.

*Figure 5: **Precipitation in Western Iowa June 17, 2024**; Precipitation by Inches at 4:00 a.m. During the DR-4796 Event*



Source: Ventusky All-in-One Weather GIS Database

*Figure 6: **Precipitation in Western Iowa June 17, 2024**; Precipitation by Inches at 7:00 a.m. During the DR-4796 Event*



Source: Ventusky All-in-One Weather GIS Database

The maps above show precipitation in the state's disaster-impacted region at two intervals on June 17, 2024: 4:00 a.m. and 7:00 a.m. The red box roughly indicates the MID counties. These graphics illustrate the speed and strength of the severe rain events that created flood conditions.

Even with information on soil saturation and predicted rainfall, flash floods can still catch people by surprise. Flash flooding is an extremely dangerous form of flooding that can reach full peak in only a few minutes and allows little or no time for protective measures to be taken by those in its path. Flash flood water moves at very fast speeds and can move boulders, tear out trees, scour channels, destroy buildings and obliterate bridges. Flash flooding often results in higher loss of life, both human and animal, than slower-developing river and stream flooding. A flash flood event can impact areas far from a tributary or body of water. Streets can become swift moving rivers, and basements can become deathtraps because flash floods can fill them with water in minutes. Nearly half of all flash flood fatalities are automobile related. Motorists often try to traverse water-covered roads and bridges and are swept away by the current. Recreational vehicles and mobile homes located in low-lying areas also can be swept away by water. Buildings, infrastructure and land can be eroded, extensively damaged or destroyed in a flood event. Disruption or complete shutdown of essential facilities and services, such as major travel routes, water distribution and wastewater treatment facilities, often occur during severe flood events. Depending on the severity, overall disruption may occur for just a few hours, causing minor inconveniences, or it may last up to months, causing major environmental and economic impacts in the county and state. Mesoscale Convective Systems (MCSs) are the primary precursor of flash floods. Iowa is a hotspot for MCSs. The Advanced Hydrology and Warning Application Laboratory is aiming to improve flash flood prediction and warning by improving MCS forecasting.[28]

3.2.3.1 River Flooding

A river flood is a temporary condition of partial or complete inundation of normally dry land areas from the overflow of stream banks. Flooding occurs when the flow of water is greater than the normal carrying capacity of the stream channel. Floodwater can be extremely dangerous; the force of 6 inches of swiftly moving water can knock people off their feet, and 2 feet of water can float a car. Floods can be slow- or fast-rising but generally develop over a period of days.[29] Flooding is a natural and expected phenomenon that occurs annually, usually restricted to specific streams, rivers or watershed areas.

River flooding does not have as high of a risk to humans as flash flooding does, mostly because of the slow onset of river flooding. People in a flood zone, downstream from a dam or levee, or in low-lying areas are especially vulnerable in any type of flood event. In addition, people located in areas with narrow stream channels, saturated soil or on land with large amounts of

[28] Iowa Flood Center Meeting, 2025, University of Iowa IIHR-Hydroscience & Engineering

[29] State Climate Summaries, NOAA NCEI, 2022, https://statesummaries.ncics.org/chapter/ia/

impermeable surfaces are likely to be impacted in the event of significant rainfall. Thousands of miles of rivers flow through Iowa, which is bordered by the Mississippi River to the east and the Big Sioux and Missouri rivers to the west. With many of these waterways located alongside cities and farmland, flooding is a severe hazard. From 1955 to 1997, Iowa was ranked first in state losses due to flooding. During the first two weeks of June 2008, heavy rainfall on soil already saturated from unusually wet conditions caused record flooding along multiple rivers. Of the state's 99 counties, 83 were declared disaster areas, and damages were estimated at almost $10 billion.

3.2.3.2 Ice Jams

River flooding also can be caused by ice jams. Ice jam flooding generally occurs when warm weather and rain break up frozen rivers or any time there is a rapid cycle of freezing and thawing. The broken ice floats downriver until it is blocked by an obstruction such as a bridge or shallow area, where an ice jam forms, blocking the channel and causing flooding upstream.

In 2017, ice jams in January caused flooding along the Iowa River and the Mississippi River. In 2016, flooding caused by ice jams occurred along the English River, Des Moines River, Cedar River, West Fork Cedar River, and several times and in several places along the Iowa River (near Marengo, Marshalltown and twice at Columbus Junction). In 2015, ice jams caused rivers to rise along the Mississippi River and Iowa River (particularly at Marengo). In 2014, ice jams caused flooding along the Iowa River, the Skunk River and the Wapsipinicon River. That same year, in Cedar Rapids an ice jam caused the river to jump 5 feet, reportedly closing a road, and another ice jam on Beaver Creek also flooded a road. March of 2013 saw a good deal of flooding due to ice jams, occurring along the Cedar, Wapsipinicon, Big Sioux and Maquoketa rivers. That month an ice jam also caused damage to pilings of a bridge crossing the North Fork Maquoketa River.[30] While ice jams could form anywhere along rivers and streams, some areas are known to have a higher probability for the development of ice jams and the subsequent flooding that comes from them. Such areas of higher probability include:

- Areas where the river slope naturally decreases
- Culverts that can freeze solid
- The headwaters of a reservoir
- Areas of channel constriction such as bridges
- Bends in the channel
- Shallow areas where channels can freeze solid

[30] US Army Corps of Engineers Ice Jam Database, n.d., https://icejam.sec.usace.army.mil/

While such areas are not mapped throughout the state, mapping has become available in the last five years that shows the areas where rivers and streams are more likely to inundate at various probabilities, as based on hydrologic and hydraulic models. The Iowa Statewide Floodplain Mapping Project ("Project") has been instrumental in mapping such river flood areas and probabilities. Funded by HUD in response to the devastating 2008 flood, the Project began in 2010 to create and update floodplain maps throughout the state. The Iowa Flood Center (IFC), the Iowa Department of Natural Resources (Iowa DNR) and USACE, working with FEMA and the Iowa Natural Heritage Foundation, created floodplain maps for Iowa's counties. The maps show probability, intensity and depth of flooding for every stream draining more than 1 square mile. After several years of work, probability and intensity flood information is now available:[31]

3.2.3.3 State Flood Mitigation Board

In 2012, the State of Iowa Legislature established the Iowa Flood Mitigation Board (Iowa Code, Chapter 418). The purpose of this board is to create and oversee a flood mitigation program for the State of Iowa. The board is made up of four members of the public, six subject matter experts from state agencies, and four ex-officio members from the General Assembly. Prior to the 2019 floods, the Iowa Flood Mitigation Board received, approved and oversaw applications from local governments for mitigation projects funded through a Sales Tax Increment program. Beginning in 2024 and continuing through 2028, $5 million will be allocated annually to the Levee Improvement Fund. Any community benefiting from a levee is an eligible applicant under this program. Based on program requirements, awards are anticipated to begin in state fiscal year 2025.[32] The Office of Levee Safety & Iowa Geological Survey will conduct a survey to better understand the deficiencies in construction, maintenance and operation of each levee in a levee district; the amount of capital expenditure required for the repair or reconstruction for each levee in a levee district; the payment obligations creating legal indebtedness incurred by the levee district; and the budgeted revenue ceiling of the levee district based on a maximum assessment rate for classified lands used to maintain the levee as apportioned to each owner of such land.

3.2.4 Severe Storm

"Severe storm" is an umbrella term used to describe instances of lightning, damaging winds, hail, tornadoes flooding.[33] For this Action Plan, the following section will discuss thunderstorms, hail and lightning as instances of severe storming. Tornadoes and high wind will be addressed in their own hazard profile.

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[31] The flood risk map data for all counties in Iowa is available through an interactive online viewer at http://ifis.iowafloodcenter.org/ifis/newmaps/risk/map

[32] Flood Mitigation Board, Iowa HSEM, 2024 https://homelandsecurity.iowa.gov/resources/flood-mitigation-board

[33] Severe Storms, NOAA, 2016, https://www.noaa.gov/explainers/severe-storms

3.2.4.1 Thunderstorms

Thunderstorms are common in Iowa and can occur singly, in clusters or in lines. Thunderstorms can result in heavy rains, high winds (reaching or exceeding 58 mph), tornadoes or hail. For the purposes of this hazard analysis and risk assessment, the thunderstorm effect of flooding due to rain is primarily analyzed in the profile of flash flood and flood, and the effects of high wind are included in the profile of tornado/high wind. In this profile, the thunderstorms' effects and risks of lightning and hail are those primarily analyzed and assessed.

3.2.4.2 Lightning

Lightning is an electrical discharge that results from the buildup of positive and negative charges within a thunderstorm. When the buildup becomes strong enough, lightning appears as a "bolt" or flash of light that occurs within the clouds or between the clouds and the ground. A bolt of lightning reaches temperatures approaching 50,000°Fahrenheit in a split second. This rapid heating, expansion and cooling of air near the lightning bolt creates thunder.

3.2.4.3 Hail

Hailstorms are a product of a severe thunderstorm in which pellets or lumps of ice (of most concern when greater than 1 inch in diameter) fall with rain. Hail is produced in many strong thunderstorms by strong rising currents of air carrying water droplets to a height where freezing occurs; the ice particles grow in size until they are too heavy to be supported by the updraft and fall back to earth. Hail can be smaller than a pea or as large as a softball and can be very destructive to plants and crops. Pets and livestock are particularly vulnerable to hail.

More recently, in the five-year period between November 2017 and October 2022, the NCEI Storm Events Database lists 278 hail events and more than 108 heavy-rain events that have impacted Iowa. Some storms affect multiple counties, but the data for this five-year period has been sorted to count each "episode" only once. Thunderstorms may occur singly, in clusters or in lines, so it is also possible that several thunderstorms may affect the same area in the course of a few hours. In addition, the NCEI database includes 31 lightning events for that five-year period, but it should be noted that only lightning events that result in damages are recorded in the NCEI database. The NCEI data is not perfect, but represents best available data. Previous occurrences of tornadoes or severe wind related to thunderstorms are discussed further in the hazard profile for tornado/wind. Likewise, flooding events related to thunderstorms are detailed in the flood hazard profile.

As mentioned, lightning events are typically only reported in NCEI data when they cause significant damage or injury. According to NCEI, lightning events since 1996 have caused five direct injuries and estimated losses totaling $1,948,000 in property damage. No lightning-related deaths are reported in NCEI data as having occurred during this period.

Both people and property are vulnerable to hail and lightning, and actions should be taken to reduce that vulnerability wherever it is found in Iowa, whether in the east or west, or in big cities or small towns. Some methods for mitigating the effects of these storms include:

- Provide proper grounding for structures that need it, and other structural improvements; jurisdiction building codes could be improved and/or adopted to address these issues
- Produce and provide educational and awareness materials to inform people about how they should prepare for and respond to thunderstorms, especially what to do when outside
- Build shelters or safe rooms at parks and other outdoor areas where people may be
- Encourage people to get weather radios
- Harden and retrofit electrical lines and equipment

3.2.5 Tornado & High Wind

A tornado is a violent windstorm characterized by a twisting, funnel-shaped cloud. Tornadoes are most often generated by thunderstorm activity but sometimes result from hurricanes and other tropical storms. Tornadoes occur when cool, dry air intersects and overrides a layer of warm, moist air, forcing the warm air to rise rapidly. Tornado wind speeds normally range from 65 mph to more than 200 mph but can reach more than 300 mph. The maximum winds in tornadoes are often confined to extremely small areas and vary tremendously over short distances, even within the funnel itself. These storms typically travel at around 10 to 20 mph but can move at more than 60 mph. Damage paths can vary from as narrow as 1 mile to as wide as 50 miles. Tornadoes can occur at any time of the year and at any time of the day. Tornadoes are measured by their intensity in terms of wind speed and their area using the Enhanced Fujita (EF) Scale. The scale ranges from EF0, with minor damages from winds ranging 65-85 mph, to EF5 with severe damages from winds more than 200 mph.[34] The EF Scale, which became operational on February 1, 2007, is used to assign a tornado a “rating” based on estimated wind speeds and related damage.

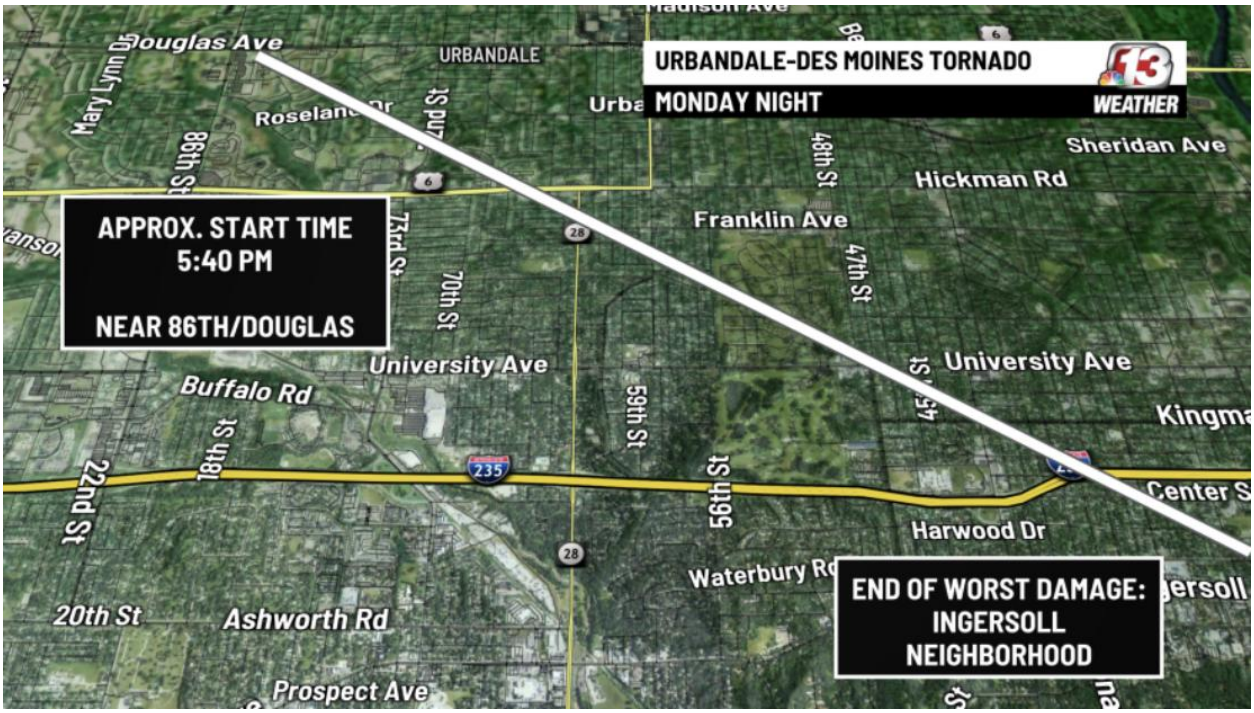
Figure 7: The Enhanced Fujita Scale (EF Scale)

EF SCALE	
EF Rating	**3 Second Gust (mph)**
0	65-85
1	86-110
2	111-135
3	136-165
4	166-200
5	Over 200

[34] The Enhanced Fujita Scale (EF Scale), NOAA National Weather Service, n.d. https://www.weather.gov/oun/efscale

Source: NOAA National Weather Service, n.d.

Figure 8: Event Path, Urbandale-Des Moines EF1 Tornado Event, July 15, 2024



Source: SiouxLand Proud.com, Weather News, 2024

At approximately 5:40 p.m., one storm cell began to produce rotation right over Urbandale, prompting a tornado warning. The most serious damage from that storm extended from just southeast of the 86th Street/Douglas intersection in Urbandale through the Karen Acres neighborhood, crossing the intersection of 63rd/Hickman to the lower Merle Hay and Franklin Ave. neighborhoods, Glendale Cemetery to Polk Blvd., and finally near and around Ingersoll Ave. on the west end.[35]

Certain populations, such as those with residents who live in mobile homes, are more vulnerable to impacts from tornadoes. The 2023 ACS 5-Year Estimates Subject Table shows that in Iowa there are approximately 39,722 occupied mobile homes, making up nearly 3% of the occupied housing units.[36] Residents living in these units will need additional assistance in finding shelter during tornado events. Tornadoes may become more frequent or severe due to increasing hazards. Higher temperatures and humidity may increase the atmospheric instability

[35] SiouxLand Weather News, 2024, https://www.siouxlandproud.com/weather/weather-news/storm-recap-des-moines-metro-hit-by-tornado/?nxsparam=1

[36] Physical Housing Characteristics for Occupied Housing Units, 2023 ACS 5-Year Estimate Subject Table, 2023, https://data.census.gov/table/ACSST5Y2023.S2504?q=Owner/Renter+(Householder)+Characteristics&g=040XX00US19

associated with the generation of severe thunderstorms and tornadoes. However, vertical wind shear also could decrease, resulting in fewer or weaker severe thunderstorms and tornadoes.

3.2.5.1 Windstorms

Windstorms are extreme winds associated with severe winter storms, severe thunderstorms, downbursts and very steep pressure gradients. Windstorms, like tornadoes, are experienced in all regions of the United States. Unlike tornadoes, windstorms may have a destructive path that is miles wide, and the duration of the event could range from hours to days. These events can produce straight-line winds in excess of 64 knots (73 mph), causing power outages, property damage, impaired visibility and crop damage. It is often difficult to separate windstorms and tornado damage when winds get above 64 knots.

The NCEI Storm Events Database shows 15 tornado and 21 high wind events reported in the region between July 1, 2013, and August 31, 2019, accounting for $2,441,000 in damages. Of the 15 tornado events, 11 were produced from the same thunderstorm cell. Damage from high and/or straight-line winds can be mistaken for tornado damage due to intensity.

While FEMA-regulated tornado shelters are often too cost prohibitive for communities to construct, the presence and severity of high wind and tornado activity offers significant motivation to incorporate mitigation elements into remodel, renovation and new construction projects.

3.2.6 Drought

Drought is defined as a period of prolonged abnormally low precipitation producing severe dry conditions. But what is “abnormally low precipitation” or “severe dry conditions”? And how long is “prolonged”? The National Drought Mitigation Center, in partnership with several federal agencies, tracks drought conditions throughout the country with the U.S. Drought Monitor (USDM). The USDM uses several criteria to determine how severe drought is in any particular area. It updates the classifications of areas every week. Thus, the USDM has become a useful tool for tracking how severe drought is in any given area and how long it lasts.[37]

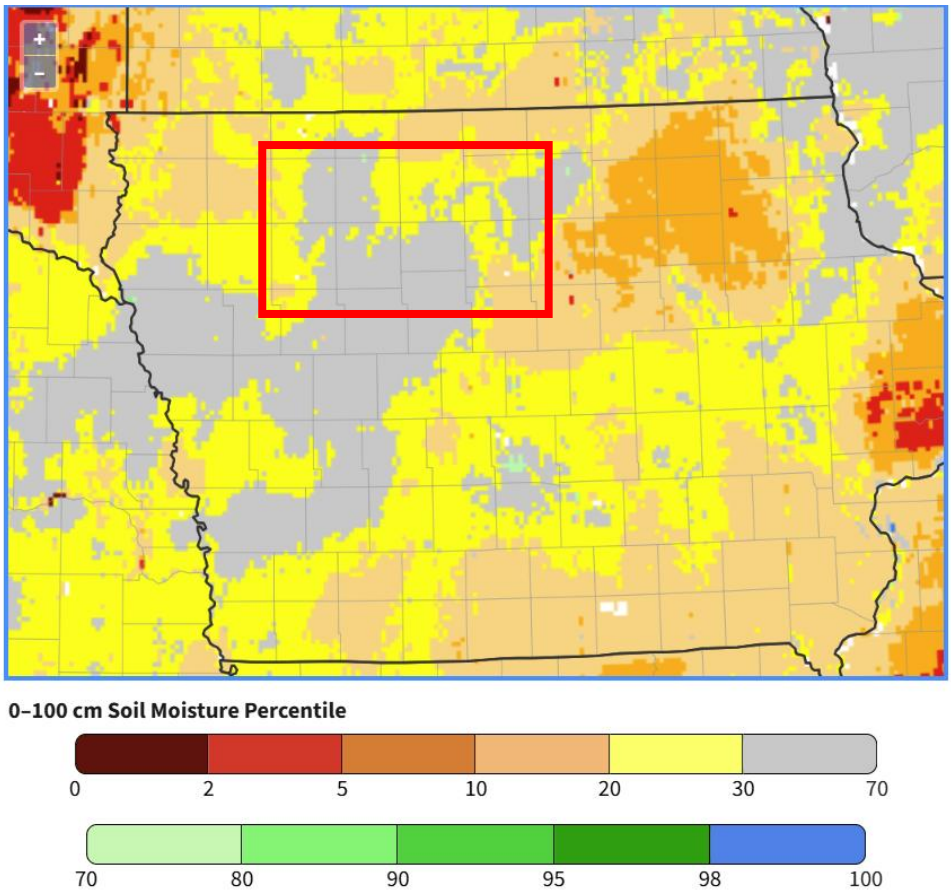
No portion of the State of Iowa is immune to drought conditions. Vulnerability to drought is the result of multiple factors. Different communities or sectors draw water from different sources, and each source has different vulnerabilities to shortages based on precipitation; watershed size; infiltration rates; inflow or throughflow (whether riverine or underground flow); and hydrogeological factors like porosity, permeability, etc. Some communities have access to more water sources than others. In Iowa, there is a general geological trend of having access to fewer aquifers in the north and more aquifers in the south.[38] The difference is especially pronounced

[37] Iowa, U.S Drought Monitor, 2025 https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?IA

[38] Section 3.3.1. Drought Part B. Iowa Hazard Mitigation Plan, Iowa Comprehensive Emergency Plan, 2025, https://homelandsecurity.iowa.gov/disasters/hazard-mitigation#:~:text=The%20State%20of%20Iowa%20Hazard,the%20lead%20agency%20being%20HSEM.

in the Northwest to Southeast cross-section. Communities in northwest Iowa may have access to only shallow groundwater or one or two aquifers, whereas southwest Iowa generally has access to multiple aquifers. These aquifers vary in quality and chemistry, so even communities that can draw from a different aquifer during drought may experience additional costs, health risks or general unpleasantness from water quality issues. The most significant impacts associated with drought in Iowa are those related to water-intensive activities such as agriculture, wildfire protection, municipal usage, commerce, tourism, recreation and wildlife preservation.

Figure 9: NASA SPoRT-LIS Soil Moisture Map 0–100 cm Soil Moisture Percentile, 2025



Source: National Aeronautics and Space Administration (NASA) Short-term Prediction and Transition Center (SPoRT) Soil Moisture Interactive Map, 2025

The NASA SPoRT soil moisture map in figure 9 shows the moisture content of the top 100 cm of soil compared to Iowa's historical conditions (1981-2013), based on the Noah Unified Land Surface Model. Red and orange hues indicate dried soil, while greens and blues indicate

great soil moisture.[39] The red box roughly highlights the DR-4796-impacted counties. The disaster-impacted region of northwest Iowa is drier than the surrounding areas, averaging 10-30 cm soil moisture percentile, compared to the 30-70 cm soil moisture percentile of the surrounding regions, creating more vulnerability to the aforementioned drought-related impacts.

3.2.7 Winter Storm

In the Midwest, winter storms usually occur when cold Arctic air from Canada meets warmer, moist air from the Gulf of Mexico, producing heavy snow and sometimes blizzard conditions. Severe winter storms can be characterized by heavy and/or blowing snow, freezing rain, sleet and extreme cold. Winter storms usually occur between October and April and can cause considerable damage, with heavy snow immobilizing transportation systems, downing trees and power lines, collapsing buildings, and resulting in crop and livestock losses. Blizzards are winter storms lasting at least three hours with sustained wind speeds exceeding 35 mph, visibility of 0.25 mile or less, and white-out conditions. When heavy snow or freezing accumulates in excess of 6 inches in a 12-hour period or 0.25 inch, respectively, it can disrupt the flow of vital supplies and emergency and medical services. Severe ice storms can also result in electric power loss to large areas of Iowa, impeded emergency assistance, and stranded motorists. Since 1991, Iowa has had eight severe winter storm-related presidentially declared major disasters.

The frigid temperatures and wind chills associated with severe winter storms also are dangerous to people, particularly children and the elderly, sometimes resulting in hypothermia, frostbite and, in rare cases, death. Such temperatures also can freeze pipes and kill livestock, fish, wildlife and pets. From 2013 to 2017, Iowa experienced 50 winter weather events, including 23 winter storms, nine blizzards, four ice storms, 20 heavy snow events, and 17 extreme cold events, some of which overlapped.

Iowa continues to have a host of winter-related events cataloged by NCEI. The NCEI database included these winter-type events for Iowa for November 2017-October 2022:

- 84 winter weather
- 77 winter storms
- 24 blizzards
- 7 ice storms
- 23 heavy snows
- 42 cold/extreme cold/wind chill events

3.2.7.1 Freeze & Extreme Cold

The freeze-thaw cycle can break up the ground and lead to sinkholes. Dry soil freezes faster and deeper than moist soil, so water acts as a barrier to freezing. With warming winters and

[39]NASA SPoRT-LIS soil moisture map 2025, Drought.gov https://www.drought.gov/topics/soil-moisture

wetter springs projected, the coinciding timing of each may or may not intensify the effects from the freeze-thaw cycle.

Some of these events may overlap, but it is clear that in Iowa a variety of winter weather-related hazards are commonplace. In Iowa, there are cases where deaths have been attributed to cold temperatures or blizzards.

Statewide, these events resulted in an estimated $516,800 in property damage, 10 indirect deaths, three direct deaths, and 16 indirect injuries, according to the NCEI Storm Events Database. Though not reported in the NCEI database, winter weather events have also resulted in much crop damage.

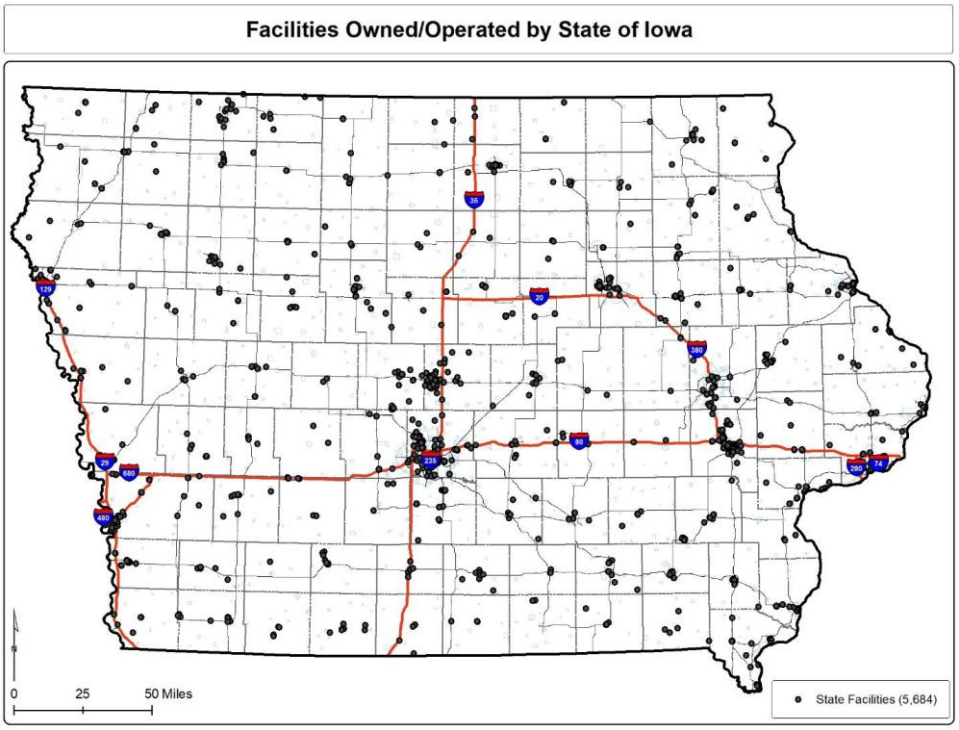
3.3. Critical Facilities & Indispensable Services

Indispensable services are those that enable the continuous operation of critical business and government functions and/or are critical to human health and safety and economic security. These services are largely operated out of critical facilities. A critical facility provides services and functions essential to a community, especially during and after a disaster. Examples of indispensable service-providing facilities requiring special consideration include:

- Police stations, fire stations, critical vehicle and equipment storage facilities, and emergency operations centers needed for disaster response activities before, during and after a disaster
- Medical facilities, including hospitals, nursing homes, blood banks and health care facilities (including those storing vital medical records), likely to have occupants who may not be sufficiently mobile to avoid injury or death during a disaster
- Schools and day care centers, especially if designated as shelters or evacuation centers
- Power-generating stations and other public and private utility facilities vital to maintaining or restoring normal services to flooded areas before, during and after a flood
- Drinking water and wastewater treatment plants
- Structures or facilities that produce, use or store highly volatile, flammable, explosive, toxic and/or water-reactive materials[40]

[40] Critical Facility, FEMA.gov, 2020, https://www.fema.gov/about/glossary/critical-facility

Figure 10: Facilities Owned/Operated by State of Iowa, 2023



Source: Iowa Comprehensive Public Emergency Plan: Section 3, 2023

State facilities are the facilities that are owned (or leased/operated) by the State of Iowa. Some facilities are critical or valuable in ways that cannot necessarily be expressed in dollars. Utilities and medical facilities are such facilities. State-owned utility and medical facilities have been identified in hazard areas of the state and will be presented in the following sections. Determining what is “critical” or not is sometimes a matter of opinion. While utilities and medical facilities are generally agreed upon as critical, some other facilities are key to operations, necessary to maintaining emergency services, and essential for providing necessary basics. Facilities that help keep roads open and clear throughout the year, whether the sun is shining or blizzards abound, is an example of such a key facility. Though often overlooked, but certainly essential for keeping roads open, is the facility where salt or brine is stored so that it can be used to treat roads and keep them open in severe winter weather.

3.3.1 Vulnerability of State Facilities by Hazard

3.3.1.1 Levee and Dam Failure

Vulnerability of state facilities to dam and levee failure cannot be completely determined because not all areas protected by dams and levees are known and mapped. The areas protected by levees found on the National Levee Database (NLD) are mapped, however, and HSEM staff were able to identify 168 state facilities located in these areas. More than a third of the state facilities protected by NLD levees are in Pottawattamie County. Polk County has the second highest number, with over 20. The rest are in the following counties: Black Hawk,

Clayton, Clinton, Dubuque, Fremont, Harrison, Jackson, Linn, Mills, Montgomery, Muscatine, Scott, Wapello, Winneshiek and Woodbury.[41]

3.3.1.2 Sinkholes

The areas close to existing sinkholes or old mines are considered more likely places for future sinkholes to form. Land in karst topography is also considered more likely for sinkhole formation. Such land is defined as having depth to carbonate bedrock of 50 feet or less. GIS was used to find which state facilities were in these areas of greater sinkhole threat, whether it be within 1,000 feet of an existing sinkhole or mine, or between 1,000 and 5,280 feet (i.e., a mile) of a sinkhole or upon karst topography. A total of 869 state facilities are located in these areas. The value of state facilities in these areas is estimated to be approximately $3.24 billion.[42]

3.3.1.3 Expansive Soils

Approximately 743 state facilities are located in the counties that have higher swelling potential. That number is approximate because the mapping is not very exact. The 743 total does not include state facilities that are in cities that appear not to be within the blue-colored area of the map (see Figure 10, that is, the area where “Part of the unit, generally less than 50%, consists of clay having high swelling potential”). The value of state facilities in the blue areas is estimated to be approximately $614.2 million.[43]

3.3.1.4 Flooding

Riverine floods is the hazard for which there is the best data for analyzing and determining the vulnerability of State of Iowa facilities. As mentioned in the profile of the flood hazards, the Iowa DNR and IFC, with help from USACE and others, have been able to map the so-called 500-year flood plain, which is the area subject to a 0.2% chance of flooding each year. For all of these areas, depth grids were modeled by IFC so the depth of flooding is estimated throughout the flood area for floods of several different frequencies (e.g., the 500-year flood, the 100-year, the 50-year, etc.). A list of state facilities was provided to HSEM by Iowa’s Office of the Chief Information Officer, the Department of Administrative Services and other state agencies. GIS was used to find which of these facilities fell inside the 500-year flood plain. Hazus software was used to calculate the average annualized loss of the state facilities in the 500-year floodplain. The depth-damage curves and formulas included in the Hazus software were used to estimate the percentage of damage (and thus dollar amounts of loss) due to flooding at the various flood frequencies (the depths of flooding at the various flood frequencies for each facility is from the depth grids mentioned above). To determine the dollar amount of damage at each depth, various factors are needed for the Hazus formula, such as occupancy type, building type and

[41] Estimates made by Iowa HSEM in 2023, https://homelandsecurity.iowa.gov/media/555/download?inline

[42] Estimates made by Iowa HSEM in 2023, https://homelandsecurity.iowa.gov/media/555/download?inline

[43] Estimates made by Iowa HSEM in 2023, https://homelandsecurity.iowa.gov/media/555/download?inline

foundation type. HSEM staff were successful in discovering the actual occupancy, building and foundation types for the Iowa Board of Regents (university) facilities, but for facilities of other state agencies assumptions were often made. For building types, all Department of Corrections facilities were assumed to be concrete, as were DNR restrooms and DOT rest areas. Remaining DOT facilities were assumed to have a steel building type. DNR shops (including concession stands) and storage buildings were also assumed to be steel. DNR shelters and lodging (including cabins and park ranger residences) were assumed to be a wood building type.

Of the state facilities in the 500-year floodplain, the most critical include a radio transmitter building and power plant in Johnson County, Hilton Coliseum and an Iowa DOT facility with hazardous materials in Story County, and a water plant in Pottawattamie County. Also in Pottawattamie County are three salt/brine storage facilities and three residential facilities. Also, three other state-owned residential buildings are located in Appanoose, Black Hawk and Hardin counties (one in each county).[44]

Woodbury County, one of the MID counties, has a minimum of 79 bridge projects pending for the next 5 to 10 years, ranging from scouring and rip rap to full replacement (about 30). While structures are primarily deteriorating due to age, severe weather has accelerated decline in infrastructure integrity. Woodbury County stated that nine high hazard dams have been identified at NRS within the region that are in or affect Woodbury County.[45]

3.3.1.5 Tornado & High Wind

As for vulnerability of state-owned critical facilities, the threat of a tornado on the actual operation of such a facility (regardless of dollar value of the facility itself) is practically the same across the state. That is because the difference in frequency of a tornado occurrence in one part of the state compared to another is really quite small (difference of just one tornado over 20 years).

The NRI indicates that the following counties average six to seven strong wind events each year (listed in order of greater average frequency): Hardin, Jasper, Story, Grundy, Polk, Jones, Cedar, Jackson, Boone, Linn, Hamilton, Johnson, Dallas, Benton, Muscatine, Clinton, Mahaska, Iowa, Black Hawk, Marion, Warren, Greene, Delaware, Dubuque, Scott, Guthrie, Louisa and Madison. Therefore, the critical facilities in these counties may be more vulnerable to disruptions due to wind than those found in the rest of the state except those in Tama, Poweshiek and Marshall counties.[46]

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[44] Iowa Comprehensive Emergency Plan, Iowa HSEM 2023, https://homelandsecurity.iowa.gov/media/555/download?inline

[45] 2020 Regional Hazard Mitigation Plan for Cherokee, Ida, Monona, Plymouth, and Woodbury Counties https://simpco.org/news/2020-regional-hazard-mitigation-plan-for-siouxland-counties

[46] Storm Report, NOAA National Weather Service Storm Prediction Center, 2023, https://www.spc.noaa.gov/climo/

Cherokee County, one of the MID counties, has several road projects listed for consideration in the near future, many of which are increasing in implementation priority due to the accelerated deterioration effects of frequent weather extremes. Among these are collaborative projects with cities, state-funded roadways and watershed improvements. Ideally, the county would like to place a generator on site for the courthouse and add two trailer-mounted generators to facilitate response throughout the county as needed. In terms of protecting residents, the county supports efforts by school districts to consider the addition of formal or certified tornado safe rooms within respective facilities, particularly in Cherokee High School and Cherokee Middle School.

3.3.1.6 Severe Winter Storms

Severe winter weather is noted as having a significant impact on city budgets. Snow removal, urgent repairs and water main breaks due to extreme cold have all been recurring in the past five years. Sinkholes are becoming more prevalent in local news, particularly in locations where aging underground infrastructure has been compromised due to shifting in freeze-thaw cycles. To determine the vulnerability of state-owned or -operated facilities to severe winter storms, an approach was used that is much like the one discussed for tornado/wind. This approach replicates the method used by FEMA's NRI to estimate Expected Annual Loss[47] (EAL) for each county in the state. The NRI calculates EAL by multiplying exposure by annualized frequency and historic loss ratio (HLR). For our purposes, we need only be concerned with the exposure of state facilities to winter storm events. In other words, we need to use the value of state facilities (and only state facilities) for the Exposure component in the formula to calculate EAL. For the components of annualized frequency (Freq) and historic loss ratio (HLR), we can use the same figures that NRI used for the various winter hazards found in the NRI. These figures are calculated for each county. So, using the sum values of state facilities in each county (for Exposure) and NRI's values for Cold Wave Annual Frequency (Freq) and Cold Wave HLR for each county, Cold Wave EALs for state facilities for each county are calculated. Comparing the EALs of the three different winter hazards, it is apparent the EALs from a Cold Wave are relatively small. Comparing the county EALs for the other two winter hazards, one notices that the three counties with the highest exposure are first or second in at least one of the lists.[48]

3.3.1.7 Drought & Excessive Heat

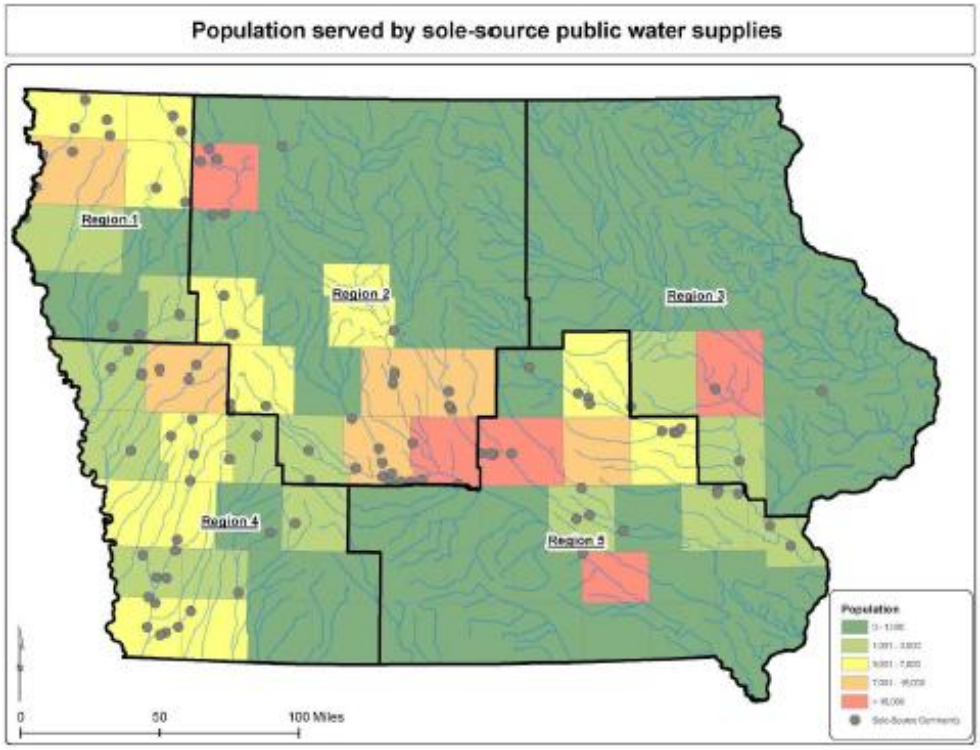
Because of the nature of these hazards, damage to the physical facility is not as much of a concern as is the impact of drought or heat to the employees that work in a facility or residents who live there. Of particular concern are areas that rely on a single source for water with the

[47] NRI's methodology may be found in National Risk Index Technical Documentation, November 2021, or at http://www.fema.gov/sites/default/files/documents/fema_national-risk-index_technical-documentation.pdf

[48] Iowa Comprehensive Emergency Plan, Iowa HSEM 2023, https://homelandsecurity.iowa.gov/media/555/download?inline

water supply being heavily influenced by drought (like a river or shallow well). Figure 11 shows such areas.

Figure 11: Population Served by Sole-Source Public Water Supplies, Iowa Comprehensive Emergency Plan, 2023



Source: Iowa Comprehensive Emergency Plan, Iowa HSEM 2023

The operation of state facilities that are served by such water supplies would be the state facilities most vulnerable to drought or heat. As medical facilities are relied upon for health care, state medical facilities are of special concern. Also, state residential facilities would be especially vulnerable because people live in these facilities that are at risk of losing water due to drought.

3.4. Conclusion

As this Mitigation Needs Assessment makes clear, there are at least five natural hazards that pose a considerable risk to the State of Iowa. By characterizing these hazards in terms of their frequency and the State of Iowa's vulnerability, IEDA and its subrecipients can draw on this needs assessment to identify current and future hazards in their communities and target CDBG-DR funds toward cost-effective solutions to mitigate them over the long term. In addition, this assessment will inform all CDBG-DR programs and activities undertaken as part of this allocation such that, at a minimum, they do not exacerbate hazards but rather serve to lessen their impacts.

4. Connection of Proposed Programs and Projects to Unmet Needs and Mitigation Needs

4. Connection of Proposed Programs and Projects to Unmet Needs and Mitigation Needs

4.1 CDBG-DR Program Allocation and Funding Thresholds

Table 28: CDBG-DR Program Allocation and Funding Thresholds

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-Aside	Estimated % to Expended in HUD and Grantee MID Areas	Estimated % to LMI
Administration	$6,734,350	5%			
Planning	$13,468,700	10%	0%		
Housing	$40,000,000	29.70%	0%	100%	70%
Infrastructure	$74,483,950	55.30%	23.59%	100%	70%
Economic Revitalization	$0	0%	0%	0%	0%
Public Service	$0	0%	0%	0%	0%
Exempt Public Service	$0	0%	0%	0%	0%
CDBG-DR Mitigation Set-Aside	$0	0%[49]	0%	0%	0%
Total	**$134,687,000**	**100%**	**15%**	**100%**	**70%**
% of Total	**100%**	**100%**	**15%**	**100%[50]**	**70%[51]**

4.2 Displacement of Persons and Other Entities

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, IEDA and subrecipients will coordinate with applicable agencies and entities to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended

[49] At a minimum, IEDA is required to spend 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities. HUD assumes that IEDA will spend well over this amount as they integrate mitigation measures into their recovery activities. Grantees should only look at the 15% CDBG-DR Mitigation Set-Aside as a cap for the activities a grantee cannot tieback to the disaster. The allocation here assumes that the Infrastructure funding will utilize most, if not all, of the 15% CDBG-DR Mitigation Set-Aside.

[50] Grantees are required to spend a minimum of 80% of their funds in the HUD-identified MID areas.

[51] Grantees are required to spend a minimum of 70% of their funds on LMI beneficiaries.

(49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and implementing regulations at 24 CFR Part 570.496(a).

These regulations and requirements apply to both property owners and tenants in the event that proposed projects cause the displacement of persons or other entities. IEDA will:

- Include detailed policies and procedures for when proposed programs or projects could potentially cause the displacement of people or other entities.
- Budget to cover the costs involved in implementing those policies and procedures. Currently, it is not anticipated that proposed programs will cause displacement.
- Incorporate accessibility considerations in its relocation policies and procedures for displaced persons with disabilities. This includes identifying accessible temporary and permanent housing options, providing reasonable accommodations during the relocation process, and coordinating with relevant agencies and advocacy organizations to support individuals with disabilities in accordance with applicable federal accessibility standards.
- Draw on existing Residential Antidisplacement and Relocation Assistance Plans (RARAPs) and will adapt them to meet the URA, Section 104(d), and related waivers and the alternative requirements specified in the Consolidated Notice. The adapted RARAP also will be updated prior to implementing any activity with CDBG-DR grant funds.

CDBG-DR funds may not be used to support any federal, state or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. None of the currently planned projects under this Action Plan contemplate the use of eminent domain.

If you need to file a fair housing complaint with HUD, IEDA recommends submitting a complaint to FHEO, as with the HUD OIG Fraud Hotline. All complaints should be submitted through www.hud.gov/fairhousing/fileacomplaint.

5. Allocation, Award Caps and Program Description

5. Allocation, Award Caps and Program Description

5.1 General Exception Criteria

Maximum awards amounts, where applicable, are identified by program in the sections below. IEDA will make exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities.

At the time of submission, maximum award amounts were established for all required programs, and IEDA does not anticipate changes. Should data and program circumstances warrant the need for a future change in the maximum award amount, IEDA will follow the process for completing a substantial amendment outlined in the State of Iowa's Citizen Participation Plan and as required by HUD before awarding funds using the revised amount.

5.2 Administration

Five percent of the overall grant will be used for administration of the grant, including compliance monitoring, performance tracking, grant reporting and general administrative activities.

Table 29: Grantee Administration Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	$6,734,350.00	5%
Total	$134,687,000.00	100%

5.3 Planning

Table 30: Grantee Planning Activities Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
IFC Planning	$1,750,000.00	1%
General Planning	$11,718,700.00	9%
Planning Total:	$13,468,700.00	10%

IEDA will distribute funding to the IFC, and IFC will utilize this CDBG-DR planning grant for three interrelated projects benefiting the disaster-declared counties in northwest Iowa:

- **Reliable Stream Sensor Network**: IFC will utilize funding to support complete upgrades to stream sensors that are more advanced. The project will support a stream sensor network redesign and overhaul, which includes installing additional sensors as requested by communities devastated by the 2024 floods. Data collected as part of the sensor network will be used in the monitoring and forecasting models.

- **New Flash Flood Forecasting System**: IFC will use the stream sensor network to provide critical information to help build an advanced flash flood forecasting system for the region.
- **Hydrostation Network to Improve Flood and Drought Monitoring and Forecasting**: IFC will use funding to expand its network of hydrostations to the HUD MID areas in northwest Iowa. Each hydrostation measures rainfall, wind speed and direction, soil moisture and temperature, and water levels in a shallow groundwater well. Data from the robust network of hydrologic stations will also help researchers monitor the short- and long-term impact of extreme weather on water resources above and below ground. Data collected as part of the sensor network will be used for monitoring and forecasting models.

IFC's planning initiative will lay the groundwork for smarter, faster, more comprehensive flood response across northwest Iowa and beyond — transforming lessons from the 2024 disaster into long-term resilience and safety for Iowans. These planning grant activities will provide real-time access to the data collected through existing online visualization systems that are maintained by IFC at the University of Iowa. The state will utilize both the HUD MID areas and the remaining disaster recovery counties as eligible areas for planning funding.

IEDA will also utilize the remaining planning funds to cover potential planning studies that address needs in the floodplain and draft (and amend) the unmet and mitigation needs sections of this Action Plan.

5.4 Housing Overview

IEDA is proposing two housing programs to help Iowans replace damaged or destroyed housing with **new** housing stock that is resilient to hazards in the impacted communities.

Table 31: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
New Housing Construction Single-Family Owner-Occupied Program	$30,000,000.00	70%
New Housing Construction Rental Program	$10,000,000.00	70%
Housing Program Total:	$40,000,000.00	70%

5.4.1 New Housing Construction Single-Family Owner-Occupied Program

Single-Family New Construction	**$30,000,000,00**	**70.00%**

5.4.1.1 Eligible Activities

New construction, acquisition, clearance and homeownership assistance; HCDA Section 105(a)1, 4, 5, 11, 14, 15 and 24; applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754).

5.4.1.2 National Objective

Low- to moderate-income (LMI) households

5.4.1.3 Lead Agency and Distribution Model

IEDA will serve as the lead agency for this program, distributing funding to city, county and tribal governments through a competitive process.

5.4.1.4 Lead Agency for Environmental Reviews

IEDA will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

5.4.1.5 Program Description

The New Housing Construction Single-Family Owner-Occupied program will build new resilient, affordable housing that will be coordinated with homebuyer assistance. Communities still face significant needs for restoring and improving the resilience of the housing stock in the disaster-impacted MID areas. The homes will be available to LMI households who are previous or current homeowners, as well as households who want to transition from renting to home ownership. The homes will first be offered to disaster-impacted families.

Based on the disaster impact and post-disaster unmet needs assessment included in this document, the state understands that a variety of housing sizes and types are needed to respond to the needs of all residents. Therefore, the program aims to fund the construction of owner-occupied single-family houses on vacant lots within existing neighborhoods or the development of homes in newly constructed neighborhoods.

Developer Incentive: Cities, counties and tribal governments within the disaster-affected area will apply to IEDA through a competitive application cycle. After the award, these entities will fund developers to build new homes. The developers will receive incentives that can be drawn down during construction. An additional per-unit cap will be included in the program guidelines and can be used by developers toward building materials that can better withstand storm events and mitigate against future natural disaster damage. The funding will be awarded as a grant, with 10% retainage held until an LMI-qualified buyer occupies the home. If necessary, additional funding will be made available to support the infrastructure for the new housing development under IEDA's proposed Infrastructure in Support of Housing program.

Homebuyer Incentive: The cost of housing units will be capped based on affordable marketing conditions in the area. Eligible LMI homebuyers can receive assistance for down payment and closing costs as a benefit to the buyer, providing up to 100% of the minimum required down payment.

Once the Action Plan is approved, IEDA will develop detailed policy on the implementation and administration of the new housing construction single-family owner-occupied program.

5.4.1.6 Eligible Geographic Areas

CDBG-DR funding will be provided to HUD-identified MID areas: Cherokee County, Clay County, Sioux County and Woodbury County. At this time, five grantee-identified MID areas have been selected; Pottawattamie, Buena Vista, Lyon, Dickenson, and Osceola counties. Per the *Grantee-Identified MID Areas* section, as needs are identified, IEDA may provide funding to other state-identified MID areas that were also impacted.

5.4.1.7 Maximum Amount of Assistance per Beneficiary

The program will provide standard awards of **$200,000** per housing unit, a mitigation incentive per unit, and up to 100% down payment assistance and closing costs for qualified homebuyers.

5.4.1.8 Maximum Income of Beneficiary

Only LMI households will be eligible for the program. The program does not set another cap on income. Specific income limits will be published in the program policies and procedures and will be based on the current HUD LMI income limits.

5.4.1.9 Mitigation Measure

This program will provide high-quality, durable, resilient, mold-resistant, energy-efficient, decent, safe, sanitary housing. Mitigations measures may include, but are not restricted to:

- Using flood resistant nonporous flooring materials
- Adding waterproof veneer to foundation, exterior walls, windows and doorways
- Elevating the home foundation and sealing cracks
- Enhancing drainage systems (e.g., installing backflow valves)
- Installing flood barriers (e.g., floodgates or flood panels)
- Incorporating new wind resistant features
- Using mold-resistant products

All new construction work will be designed to incorporate mitigation measures to withstand damage against the impact of future disasters. Projects that are funded using the Mitigation Set-Aside allocation will address a mitigation need, like flooding and wind, identified in the mitigation needs assessment for the MID areas. Program policies will provide detailed description of MIT-set aside process.

For residential buildings, IEDA will look to meet the Green and Resilient Building Standards by ensuring that all construction meets an industry-recognized standard that has achieved certification under Enterprise Green Communities, LEED, ICC–700 National Green Building Standard Green+Resilience, Living Building Challenge, or any other equivalent comprehensive green building program acceptable to HUD.

5.4.1.10 Funding Criteria

IEDA has selected funding criteria to best address the disaster-related unmet needs identified in each affected community and ensure timely project completion. Competitive application rounds will be published for the new production of affordable housing. All applications within a round will be reviewed, ranked and awarded based on a score. A minimum threshold score will be established to ensure high-quality projects are selected. The criteria used to evaluate each competitive application and award funds will include, but are not limited to:

- All new units will be constructed outside of the 100- and 500-year regulatory floodplains.
- All units will have access and connection to municipal utilities, including water, sewer and broadband. Projects dependent on wells and/or septic systems will not be eligible.
- The project will be located in one of the HUD- or grantee-identified MID areas.
- The development team has financial stability and demonstrates experience.
- The project is ready to proceed.
- The other sources of funding are well documented.
- The developer must demonstrate ownership or site control of the building site.
- The budget is comprehensive and reasonable for the project scope.
- The designs and plans demonstrate that future hazards will be mitigated.

Priority will be given to applications from the HUD-identified MID areas. All units must be marketed to disaster-impacted residents of the 2024 flooding event before being offered to an eligible member of the public.

5.4.1.11 Reducing Impediments for Assistance

IEDA will work with awarded subrecipients and their developers to draft outreach and marketing plans that will encourage the disaster-impacted populations to apply for the homebuyer assistance associated with this program. Homebuyers do not need to be identified in the application therefore allowing more time for subrecipients and developers to find eligible applicants. Since homebuyers will apply through the local jurisdiction, they have closer access to applications, allowing for more access and assistance in completing applications if necessary.

5.4.2 New Housing Construction Rental Program

New Construction Rental Program	$10,000,000.00	70.00%

5.4.2.1 Eligible Activities

New construction, acquisition, clearance; HCDA Section 105(a)1, 4, 5, 8, 11, 14, 15 and 24; applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754).

5.4.2.2 National Objective

Low- to moderate-income (LMI) households

5.4.2.3 Lead Agency and Distribution Model

IEDA will serve as the lead agency for this program, distributing funding to city, county and tribal governments through a competitive process.

5.4.2.4 Lead Agency for Environmental Reviews

IEDA will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

5.4.2.5 Program Description

The New Housing Construction Rental program will fund the construction of single-family and multifamily units on vacant lots within existing neighborhoods or in new neighborhoods developed for residential purposes. The units will serve as rental units.

Per the CDBG-DR requirements, all rental units will have an affordability period of 20 years. At least 51% of units in a project must be rented to LMI households and subject to the 65% HOME rent limits for the affordability period.

City, counties and tribal governments within the disaster-affected area will apply to IEDA through a competitive application cycle. After the award, these entities will fund developers to build new rental homes. The developers will receive incentives that can be drawn down during construction. An additional per-unit cap will be included in the program guidelines and can be used by developers toward building materials that can better withstand storm events and mitigate against future natural disaster damage. If necessary, additional funding will be made available to provide the infrastructure for the new housing development.

Once the Action Plan is approved, IEDA will develop a detailed policy on the implementation and administration of the New Housing Construction Rental program.

5.4.2.6 Eligible Geographic Areas

CDBG-DR funding will be provided to HUD-identified MID areas: Cherokee County, Clay County, Sioux County and Woodbury County. At this time, five grantee-identified MID areas have been selected; Pottawattamie, Buena Vista, Lyon, Dickenson, and Osceola counties. Per the *Grantee-Identified MID Areas* section, as needs are identified, IEDA may provide funding to other state-identified MID areas that were also impacted.

5.4.2.7 Maximum Amount of Assistance per Beneficiary

The program will provide standard awards of a maximum of **$150,000** per housing unit and a mitigation incentive per unit.

5.4.2.8 Maximum Income of Beneficiary

Only LMI households will be eligible for the program. The program does not set another cap on income. Specific income limits will be published in the program policies and procedures and will be based on the current HUD LMI income limits.

5.4.2.9 Mitigation Measure

This program will provide high-quality, durable, resilient, mold-resistant, energy-efficient, decent, safe, sanitary housing. Mitigations measures may include, but are not restricted to:

- Using flood resistant nonporous flooring materials
- Adding waterproof veneer to foundation, exterior walls, windows and doorways
- Elevating utilities above the flood level
- Incorporate sloped landscaping to help drain water
- Enhancing drainage systems (e.g., installing backflow valves)
- Installing flood barriers (e.g., floodgates or flood panels)

All new construction work will be designed to incorporate mitigation measures to withstand damage against the impact of future disasters. Projects that are funded using the Mitigation Set-Aside allocation will address a mitigation need, like flooding and wind, identified in the mitigation needs assessment for the MID areas. Program policies will provide detailed description of MIT-set aside process.

For residential buildings, IEDA will look to meet the Green and Resilient Building Standards by ensuring that all construction meets an industry-recognized standard that has achieved certification under Enterprise Green Communities, LEED, ICC–700 National Green Building Standard Green+Resilience, Living Building Challenge, or any other equivalent comprehensive green building program acceptable to HUD.

5.4.2.10 Funding Criteria

IEDA has selected funding criteria to best address the disaster-related unmet needs identified in each affected community and ensure timely project completion. Competitive application rounds will be published for the new production of affordable rental housing. All applications within a round will be reviewed, ranked and awarded based on a score. A minimum threshold score will be established to ensure high-quality projects are selected. The criteria used to evaluate each competitive application and award funds will include, but are not limited to:

- All new units will be constructed outside of the 100- and 500-year regulatory floodplains.
- All units will have access and connection to municipal utilities, including water, sewer, and broadband. No projects dependent on wells and/or septic systems will be eligible.
- The project will be located in one of the HUD- or grantee-identified MID areas.
- The development team has financial stability and demonstrates experience.
- The project is ready to proceed.
- The other sources of funding are well documented.
- The developer must demonstrate ownership or site control of the building site.
- The budget is comprehensive and reasonable for the project scope.
- The designs and plans demonstrate that future hazards will be mitigated.

- The pro forma and rent calculation worksheet is detailed and filled out completely.

Priority will be given to applications from the HUD-identified MID areas. All units must be marketed to disaster-impacted residents of the 2024 flooding event before being offered to an eligible member of the public.

5.4.2.11 Reducing Impediments for Assistance

IEDA will work with awarded subrecipients and their developers to draft outreach and marketing plans that will encourage the disaster-impacted populations to apply for the rental units produced.

5.5 Infrastructure Overview

IEDA is proposing three infrastructure programs: Infrastructure in Support of Housing, General Infrastructure, and FEMA Non-Federal Match. These programs will support a wide range of infrastructure activities necessary to assist communities recovering from the 2024 flooding event.

Table 32: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Infrastructure in Support of Housing	$10,000,000.00	80.00%
General Infrastructure	$39,483,950.00	100.00%
FEMA Non-Federal Match	$25,000,000.00	25.00%
Infrastructure Program Total:	$74,483,950.00	72.00%

5.5.1 Infrastructure in Support of Housing

Infrastructure in Support of Housing	**$10,000,000.00**	**80.00%**

5.5.1.1 Eligible Activities

Public facilities and improvements; HCDA 105(a) 1, 2 and 4; applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754).

5.5.1.2 National Objective

Low- to moderate-income area benefit (LMA)

5.5.1.3 Lead Agency and Distribution Model

IEDA will serve as the lead agency for this program, distributing funding to city, county, and tribal governments through a competitive process.

5.5.1.4 Lead Agency for Environmental Reviews

IEDA will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

5.5.1.5 Program Description

As demonstrated in the needs assessment, recovering communities need ongoing support to rebuild houses and whole neighborhoods lost due to flooding. This program will provide funding for infrastructure projects specifically to support the development of new CDBG-DR-funded housing units for homeowners and renters. Eligible activities may include, but are not limited to, neighborhood streets, curbs, sidewalks, access to utilities and stormwater system upgrades in residential neighborhoods.

This program will provide developers with funding to support neighborhood infrastructure improvements. All new construction work will be designed to incorporate mitigation measures to withstand damage against the impact of future disasters.

This program addresses the unmet needs tied to providing new affordable housing to improve the housing stock in the disaster-impacted MID areas. To further incentivize the development of CDBG-DR-funded affordable housing, this program allows the developer to request additional funding for infrastructure needs that arise during development.

Once the Action Plan is approved, IEDA will develop a detailed policy on the New Construction Single-Family Owner-Occupied and Rental programs that will have implementation and administration impact on the Infrastructure in Support of Housing program.

5.5.1.6 Eligible Geographic Areas

CDBG-DR funding will be provided to HUD-identified MID areas: Cherokee County,; Clay County, Sioux County and Woodbury County. At this time, five grantee-identified MID areas have been selected; Pottawattamie, Buena Vista, Lyon, Dickenson, and Osceola counties. Per the *Grantee-Identified MID Areas* section, as needs are identified, IEDA may provide funding to other state-identified MID areas that were also impacted.

5.5.1.7 Maximum Amount of Assistance per Beneficiary

Up to **$90,000** per unit (or 35% of housing construction costs, whichever is lower).

5.5.1.8 Maximum Income of Beneficiary

Beneficiaries of infrastructure projects will be those residents located within the defined service area of the project. The service area must contain at least 51% LMI residents. No additional income caps have been set for this program.

5.5.1.9 Mitigation Measure

All infrastructure will be designed to 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. Projects that are funded using the Mitigation Set-Aside allocation will address a mitigation need, like flooding, identified in the mitigation needs assessment for the MID areas. Program policies will provide detailed description of MIT-set aside process.

5.5.1.10 Funding Criteria

Funding for this program will be part of the application process for either the Single-Family Owner-Occupied program or the New Housing Construction Rental program. For more details on funding criteria, refer to the program descriptions for those programs in this document.

5.5.1.11 Reducing Impediments for Assistance

The state will prioritize projects that provide the essential public infrastructure necessary for housing. The housing development will occur in areas affected by the disaster.

5.5.2 General Infrastructure

General Infrastructure	**$39,483,950.00**	**100.00%**

5.5.2.1 Eligible Activities

Acquisition, construction, reconstruction or installation of public works, facilities, and site or other improvements; HCDA Section 105(a)1, 2, 4, 9 and 14 applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754).

5.5.2.2 National Objective

Low- to moderate-income area benefit (LMA) and Urgent Need (UN) national objectives. The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation public infrastructure benefits within the HUD- or grantee-identified MID.

5.5.2.3 Lead Agency and Distribution Model

IEDA will serve as the lead agency for this program, distributing funding to city, county, and tribal governments through an application process.

5.5.2.4 Lead Agency for Environmental Reviews

IEDA will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

5.5.2.5 Program Description

These funds are intended to improve disaster-damaged infrastructure and improve stormwater management systems to make the disaster-affected communities more resilient to floodwater impacts and mitigate the impact of future disaster events. Infrastructure activities may include acquisition, planning, engineering and construction. Projects will encompass a broad range of activities such as repairs to disaster-damaged infrastructure, improving stormwater capacity of existing facilities, and installation of new stormwater management systems.

Funds cannot be used to cover the costs for maintenance and operation or purchase of construction equipment. Private utilities that serve the general public are eligible to receive funding.

Once the Action Plan is approved, IEDA will develop detailed policy on the implementation and administration of the General Infrastructure program.

5.5.2.6 Eligible Geographic Areas

CDBG-DR funding will be provided to HUD-identified MID areas: Cherokee County, Clay County, Sioux County and Woodbury County. At this time, five grantee-identified MID areas have been selected; Pottawattamie, Buena Vista, Lyon, Dickenson, and Osceola counties. Per the *Grantee-Identified MID Areas* section, as needs are identified, IEDA may provide funding to other state-identified MID areas that were also impacted.

5.5.2.7 Maximum Amount of Assistance per Beneficiary

The maximum assistance available is **$5,000,000** per project.

5.5.2.8 Maximum Income of Beneficiary

Beneficiaries of infrastructure projects will be those residents located within the defined service area of the project. No additional income caps have been set for this program.

5.5.2.9 Mitigation Measure

All infrastructure will be designed to increase resilience to disasters 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. Projects that are funded using the Mitigation Set-Aside allocation will address a mitigation need, like flooding, identified in the mitigation needs assessment for the MID areas. Program policies will provide detailed description of MIT-set aside process.

5.5.2.10 Funding Criteria

IEDA has selected funding criteria to best address the disaster-related unmet needs identified in each affected community and ensure timely project completion. IEDA will accept applications from municipalities in a “open cycle” format. A minimum threshold score will be established to ensure high-quality projects are elected. The criteria used to evaluate each application and award funds will include, but are not limited to:

- The project will be located in one of the HUD- or grantee-identified MID areas.
- The project will be considered public infrastructure.
- There is clear evidence that there are mechanisms in place to ensure long-term maintenance of the project.
- The project is ready to proceed.
- The other sources of funding are well documented.
- The budget is comprehensive and reasonable for the project scope.

- The designs and plans demonstrate that future hazards will be mitigated.
- The project is based on engineered plans and cost estimates.

Each project will be evaluated related to the costs and benefits of the infrastructure project. These benefits will not only include recovery but also consider the long-term benefits of protection against future risks.

5.5.2.11 Reducing Impediments for Assistance

IEDA will streamline and simplify the application process, while procuring via an open cycle format, thereby reducing deadlines that cause municipalities to rush applications. IEDA will offer technical assistance to applicants to assist with application development, grant administration and activity delivery. Additionally, IEDA may coordinate with other public entities to provide assistance to communities interested in applying but who need additional guidance on designing eligible projects.

5.5.3 FEMA Non-Federal Match

FEMA Non-Federal Match	**$25,000,000.00**	**25.00%**

5.5.3.1 Eligible Activities

HCDA Section 105(a)1, 2, 4, 9 and 12; applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754).

5.5.3.2 National Objective

Low- to moderate-income area benefit (LMA) and Urgent Need (UN) national objectives.
The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation of public infrastructure benefits within the HUD- or grantee-identified MID.

5.5.3.3 Lead Agency and Distribution Model

The program will be administered by HSEM, who will be a subrecipient of IEDA. HSEM will administer the program and carry out activities such as reviewing projects for eligibility and determining project portion/eligible expenses for match. HSEM will also monitor projects to meet HUD requirements, including ties to the disaster, eligible activities, national objectives, procurement regulations, and compliance and other federal requirements like labor standards.

5.5.3.4 Lead Agency for Environmental Reviews

IEDA will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

5.5.3.5 Program Description

The overarching goal of the program is to support local jurisdictions with infrastructure activities related to recovery. FEMA requires the state and local governments to pay a share of the cost

of a project, called the “local share” or “match.” In the aftermath of a disaster, these match requirements can be burdensome on jurisdictions that have been overwhelmed by emergency and recovery work and further weakened by lost government revenues. The FEMA Non-Federal Match Program will help alleviate this burden.

In addition to providing the match, CDBG-DR grants may be used to fund improvements to FEMA Public Assistance (PA) or Hazard Mitigation Grant Program (HMGP) projects that demonstrate an unmet recovery need remains, that other avenues for funding have been exhausted, and that the project is critical to restoring and making the community more resilient.

All entities that are eligible for FEMA PA and FEMA HMGP may be eligible for the FEMA Non-Federal Match Program. These entities include, but are not limited to:

- Local governments
- State agencies and authorities
- Public schools (K-12)
- Universities
- Other local program applicants eligible to receive federal recovery funds, including eligible private nonprofit organizations

5.5.3.6 Eligible Geographic Areas

CDBG-DR funding will be provided to HUD-identified MID areas: Cherokee County, Clay County, Sioux County and Woodbury County. At this time, five grantee-identified MID areas have been selected; Pottawattamie, Buena Vista, Lyon, Dickenson, and Osceola counties. Per the *Grantee-Identified MID Areas* section, as needs are identified, IEDA may provide funding to other state-identified MID areas that were also impacted.

5.5.3.7 Maximum Amount of Assistance Per Beneficiary

The maximum award for the FEMA Non-Federal Match Program will be determined by the project cost. IEDA can support each project up to the non-federal match requirement of 25% of project cost. Cost overruns can also be covered by CDBG-DR match funding. For projects that have gone through FEMA review and have been deemed ineligible, and if HUD eligible, those costs can also be covered by CDBG-DR match funding.

5.5.3.8 Maximum Income of Beneficiary

Beneficiaries of the projects will be those residents located within the defined service area of the project or a direct benefit household. LMI areas or LMI households will be prioritized for this program. No additional income caps have been set for this program.

5.5.3.9 Mitigation Measure

All infrastructure will be designed to increase resilience to disasters 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. Program policies will provide detailed description of MIT-set aside process.

5.5.3.10 Funding Criteria

Eligible entities will apply to HSEM through an application process for funding. LMI communities will be prioritized for funding. The portion of funds applied as match for any project must meet CDBG-DR eligibility requirements in addition to the requirements of the federal and state agency administering the project.

5.5.3.11 Reducing Impediments for Assistance

HSEM will work with communities that have received FEMA funding and evaluate if a match has already been achieved or is needed. If communities are not able to receive FEMA funding and are eligible for HUD funding, costs can be covered by CDBG-DR match funding.

6. General Information

6. General Information

6.1 Citizen Participation

IEDA adhered to the Iowa Citizens Participation Plan, which meets the federal Citizen Participation Plan requirements. Affected residents were notified of opportunities to participate in the creation of this plan in multiple ways, and public participation was facilitated through an online survey, in-person and virtual meetings and consultations, public hearings, and a public comment period.

6.2 Consultation of Developing the Action Plan

IEDA conducted several types of consultation to gather community input in the disaster-affected areas prior to the publication of the draft action plan. The goal was to understand the continuing unmet needs from the 2024 flooding events.

Online Survey. IEDA conducted an online survey advertised to residents, representatives of organizations, and affected community members and other organizations in the disaster-affected area. The survey asked questions to assess the damage residents experienced, the challenges of receiving assistance after the storm, and the current needs of those communities that still require assistance. The online survey was available on the IEDA website and published via social media as well as emailed to cities, counties and other entities.

The survey results identified 64 responses from survey respondents. Key takeaways from the survey are:

- There is a reported lack of funds to improve infrastructure, provide assistance to families, and mitigate future damages.
- There is a need for financial assistance to support families that were displaced by the flooding and/or buy out homes in the flood zone.
- Within the HUD MID areas, there is a higher need for infrastructure development and mitigation to recover from the flooding (32% of respondents highlighted the need for repairs to local infrastructure and investments in water supply and sewer system resiliency). However, in the ancillary areas, housing is a higher need (13% reported a need for construction of new single-family homes).
- In the HUD MID areas, infrastructure projects that may be funded include improvements to wastewater treatment facilities, sewer systems, storm sewer drainage improvements and lift stations.
- There is a need for using CDBG-DR funds to support match on FEMA projects. Specifically, there is a need for matching funds for buyout activities to offset the burden to city finances. This would allow for investment in new housing developments, hazard mitigation and other capital projects

Stakeholder Meetings: In addition to the survey detailed above, IEDA also conducted 10 meetings with interested nonprofit organizations, city and county governments, and other

entities in the disaster-affected area. The meetings included a brief presentation of the Action Planning process followed by an opportunity for participants to discuss ongoing unmet needs.

Table 33: Consultations

Partners Consulted	Describe Consultation
Various via survey	64 responses received from the public survey published on the IEDA website.
City of Rock Valley	Met with the county supervisor, emergency management representative, city council members, and the economic development representative to discuss proposed CDBG-DR programs and unmet need (date: 04/29/2025).
City of Spencer	Met with county supervisors, emergency management representatives, council members, and Northwest Iowa Planning and Development Commission members to discuss proposed CDBG-DR programs and unmet need (date: 04/29/2025).
Sioux City and Sioux County	Met with the city to discuss interest in partnering with local trade schools for construction employment for CDBG-DR projects (date: 05/06/2025).
Siouxland Interstate Metropolitan Planning Council (SIMPCO)	Met with the council to discuss plans for the CDBG-DR funding, training needs for CDBG-DR staff, and potentially updating the Big Sioux floodplain plan that affects Iowa and South Dakota.
Cherokee County	Met with county staff to discuss requirements of the CDBG-DR funding and potentially funding a $40M wastewater plan (date: 05/06/2025).
Woodbury County	Met with county board to discuss the state's plan for the CDBG-DR funding (date: 05/06/2025).
Des Moines	Attended the 2025 Iowa Association of Councils of Government (ICOG) Conference in Des Moines to promote the availability of grant funds (date: 05/14/2025).
Correctionville & Woodbury County	Visited the site to talk with representatives about the impact of the disaster and understand their recovery needs (date: 06/05/2025).
Indian tribes	In addition to consultations with local COGs and municipalities, IEDA also reached out to Indian tribes in Northwest Iowa. Reached out to the Meskwaki Nation (Sac & Fox Tribe of the Mississippi in Iowa) and no needs were identified at this time.
Federal Partners (FEMA, SBA)	IEDA reached out to FEMA and SBA for data pertinent to the disaster to help inform the unmet need analysis.
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	IEDA reached out to HSEM to understand how FEMA funds were being used.
Agencies that manage local COCs	IEDA reached out to several COCs to determine disaster impacts to the homeless populations.
PHAs	IEDA reached out to several PHAs to discuss ongoing public housing needs.

6.3 Public Comments

IEDA published this Action Plan on its website (https://opportunityiowa.gov/community/disaster-recovery/2024-cdbg-dr-flood-recovery) for a 30-day public comment period.

Citizens were notified through postings in select newspapers, social media and email distributed to cities, counties and other entities. IEDA will ensure that all citizens have equal access to information and that methods of notification adhere to the Americans with Disabilities Act (ADA).

A summary of citizen comments on this Action Plan, along with IEDA responses, is included in the ***Consideration of Public Comments*** section of this document.

The public comment period for this Action Plan was **5/15/2025 to 6/14/2025**. Comments regarding the CDBG-DR Action Plan are accepted via email to Disaster@IowaEDA.com, or via mail to the Iowa Economic Development Authority, 1963 Bell Avenue, Suite 200, Des Moines, IA 50315, and will be collected during the public hearing.

6.4 Public Hearings

6.4.1 Access to Public Hearings

Per the Federal Register's approach for CDBG-DR, at least two public hearings are required during the 30-day comment period to obtain citizens' views about the Action Plan. Both public hearings will be held virtually. IEDA will ensure that all citizens have equal access to information and will adherence with the ADA.

IEDA held two public hearings:

- Public Hearing 1: May 29, 2025 | 11:00 a.m. – 12:00 p.m.
- Public Hearing 2: June 9, 2025 | 5:00 p.m. – 6:00 p.m.

The notification about the hearing was posted on the IEDA disaster recovery webpage; in the LocaliQ (*distributes to Des Moines Register*); on social media; and emailed to local governments, councils of governments, and local organizations. Along with the hearing, IEDA provided key information and recorded presentations on the Action Plan and the funded programs on its disaster recovery website.

6.4.2 Citizen Complaints

IEDA or its subrecipients will provide a written response to each formal complaint within 15 working days of receipt of the complaint or will document why additional time for a response is needed.

- Formal complaints are written statements of grievance, including email, comments posted on the IEDA website, and handwritten complaints. IEDA shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the IEDA website. IEDA shall maintain a tracker for collecting and categorizing complaints through resolution.

- Informal complaints are verbal complaints. IEDA and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process. For verbal complaints, IEDA will ensure that it is possible to receive complaints in alternate formats as reasonable accommodations for people with disabilities. Methods may include:
  - Engaging with participants during in-person meetings or feedback sessions using interpreters or personal IDs
  - Having a dedicated phone line with accessible options (e.g., Telecommunications Device for the Deaf, Video Relay Service, or Voice-to-Text Services)
  - Using accessible virtual platforms that can utilize Speech-to-Text software
- Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste or abuse of funds will be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

IEDA will make available to HUD detailed Fraud, Waste and Abuse Policies and Procedures on the IEDA disaster recovery webpage to demonstrate that adequate procedures are in place to prevent fraud, waste and abuse.

6.4.3 Amendments

Over time, recovery needs will change. Thus, IEDA will amend the disaster recovery action plan as often as necessary to best address long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

6.4.4 Substantial Amendment

A change to this Action Plan is considered substantial if it meets the following criteria:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- The allocation or reallocation in excess of $5 million or greater of a program budget
- A proposed change to an adopted method of distribution

When IEDA pursues the substantial amendment process, the amendment will be posted on the IEDA Disaster Recovery webpage for a 30-day public comment period. The amendment will be posted in adherence with the ADA. IEDA will review and respond to all public comments received and submit the amendment to HUD for approval.

6.4.5 Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. IEDA will notify HUD five business days before the change is effective. All amendments will be numbered sequentially and posted to the IEDA disaster recovery webpage into one final, consolidated plan.

6.4.6 Performance Reports

Performance reports will be completed on a quarterly basis using the HUD DRGR system. Data will be gathered for performance reports from subrecipients as well as internally at IEDA. The data will be compiled and entered per activity in DRGR. Financial and progress-based data will be collected.

6.5 Consideration of Public Comments

Table 34: Consideration of Public Comments

Comment Received	Grantee's Response
Home Innovation Research Labs: I strongly urge for the inclusion of credible third-party green building programs, including NGBS Green -based on the ICC-700 National Green Building Standard (NGBS) - in the State of Iowa Draft Action Plan for June 2024 Midwest Flooding. Energy-efficient, green-certified homes are not only more affordable to live in because of lower operating and maintenance costs, but also safer, healthier, and far more resilient in the face of disasters. These homes protect residents during extreme weather and power outages, lower public health burdens through improved indoor air quality, and reduce the need for emergency intervention and costly disaster recovery efforts. A green building program is most impactful when adopted for large-scale construction efforts, such as those undertaken in the aftermath of a disaster, where entire communities are being rebuilt from the ground up. In these scenarios, sustainable design practices- like heat island mitigation through reflective surfaces and green roofs, or the use of permeable landscaping to manage stormwater- offer exponentially greater benefits when applied across a broad area. Not only do these strategies enhance environmental performance and resilience, but their effectiveness compounds at scale, transforming entire neighborhoods into more livable, energy-efficient spaces while potentially preventing future flooding and extreme temperature events. Green building programs like NGBS Green are a proven, cost-effective investment that ensures quality through third-party verification, supports energy independence, and strengthens long-term community resilience. They also spur local job creation and empower builders with market flexibility to choose the most appropriate and efficient solutions. Including NGBS in the State's recovery strategy is a smart, equitable use of federal funds that will lead to stronger, healthier, and more self-sufficient communities.	For new construction and reconstruction of housing, IEDA recognizes various green building standards. The sections for the New Housing Construction Single-Family Owner-Occupied Program and the New Housing Construction Rental Program have been updated to reflect this change. More information about these programs will be detailed in the program policies and procedures.

7. Appendix

7. Appendix

Certifications Waiver and Alternative Requirement for Action Plan Submission.

Sections 104(b)(4), (c), and (m) of the HCDA (42 U.S.C. 5304(b)(4), (c), and (m)); sections 106(d)(2)(C) and (D) of the HCDA (42 U.S.C. 5306(d)(2)(C) and (D)); section 106 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12706); regulations at 24 CFR 91.225(a)(2), (4), (5), and (6); 91.225(b)(1), (2), (3), and (4); 91.325(a)(2), (4), (5), and (6); and 91.325(b)(1), (2), (3), and (4) are waived only to the extent necessary to allow grantees to receive their CDBG-DR allocations. Each grantee receiving an allocation under an AAN must make the following certifications with its action plan, in addition to the certifications at 24 CFR 91.225 and 91.325, as applicable, that are not waived above:

a. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan - The grantee certifies that it: (1) will comply with the acquisition and relocation requirements of the Uniform Relocation Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements, and (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 part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

b. Authority of Grantee: The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, including 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 grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

d. Citizen Participation - The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

e. Consultation With Local Governments (STATE ONLY) - State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local PHAs in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

f. Use of Funds - The grantee 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% (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 grantee 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 or 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 above.

g. Grant Timeliness - The grantee 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 grantee certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or if the costs are reimbursable by FEMA or USACE, before awarding CDBG-DR assistance for the costs of carrying out the same activity.