SOUTH DAKOTA
GOVERNOR'S OFFICE OF ECONOMIC DEVELOPMENT

The State of South Dakota

DRAFT Action Plan for 2024 Disaster Events

Public Comment Period: June 11, 2025 - July 11, 2025

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1. Executive Summary

1.1 Overview

The U.S. Department of Housing and Urban Development (HUD) announced South Dakota will receive $15,375,000 in funding to support long-term recovery efforts following the 2024 severe storms, straight-line winds, and flooding (DR-4807) through the South Dakota Governor's Office of Economic Development (GOED). 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 used to address remaining unmet need in South Dakota with a focus on the HUD-designated most impacted and distressed county of Union, in ZIP codes 57038 and 57049.

To meet disaster recovery needs, the appropriations act(s) 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 facilitate a quicker recovery. HUD has allocated $15,375,000 in CDBG-DR funds to the South Dakota GOED in response to the 2024 disaster through the Allocation Announcement Notice published in the Federal Register / Vol. 90, No. 10 / Thursday, January 16, 2025 at 2025-00943. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025.

1.2 Disaster-Specific Overview

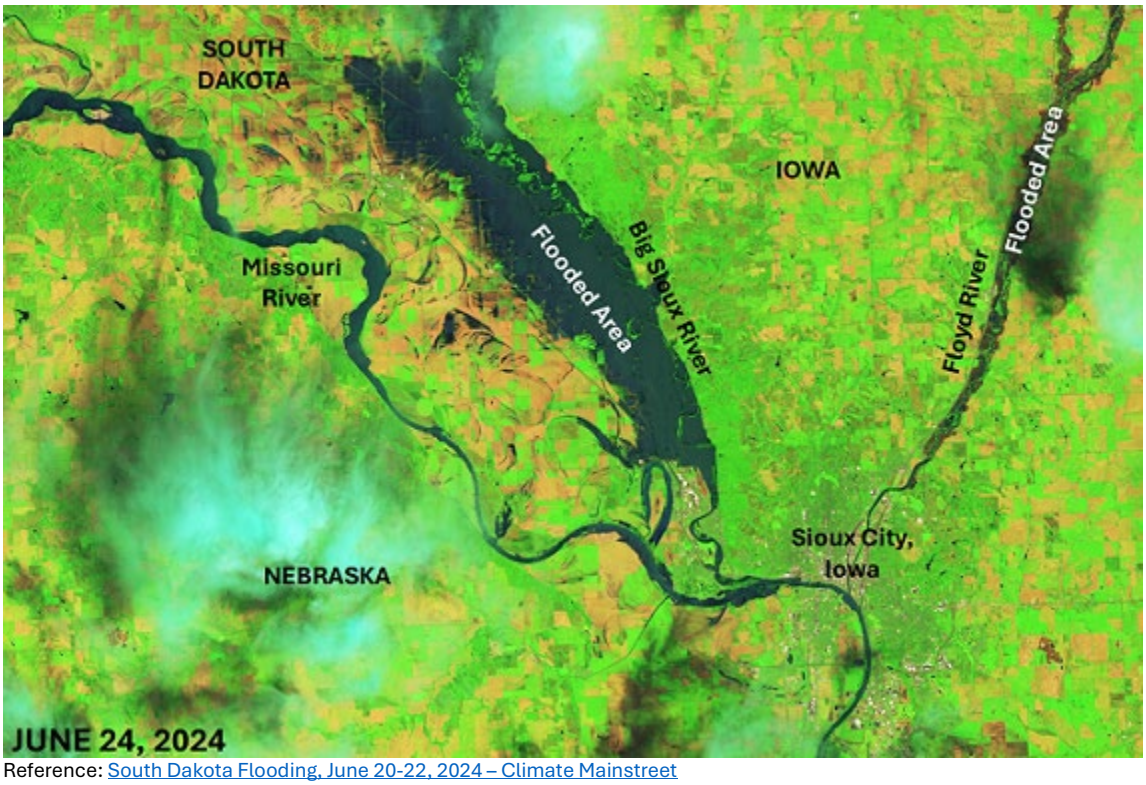
From June 16 to July 8, 2024, South Dakota experienced severe storms, straight-line winds, and flooding across the southeast quadrant of the state. Repeat, severe storms from June 20 to 22 dumped 13 inches of rain across the affected area. With soil saturated already due to previous rain, flash flooding began on June 20. The High Plains Regional Climate Center concluded that a storm of this magnitude in the area was exceptionally rare and categorized as a 1,000-year storm.[1] Then-South Dakota Governor Kristi Noem signed Executive Order 2024-04 on June 22 that declared a state of emergency in response to the storms and flooding.[2] On June 23, the Big Sioux River reached a peak of 44.98 feet, 7.28 feet above the historic record of 37.7 feet. This was especially impactful in Union County, where Big Sioux River flows through and cuts through the center of North Sioux City. Fortunately, levees diverted most of the flooding away from North Sioux City and Dakota Dunes. Major damage was avoided in North Sioux City thanks to the levee mitigation.

[1] Nippert, Page. "South Dakota Flooding, June 20-22, 2024." HPRCC, 8/9/24. South Dakota Flooding, June 20-22, 2024 – Climate Mainstreet

[2] "Governor Noem Signs Emergency Declaration for Storms and Flooding." News.SD.gov. 06/22/2024 News - Governor Noem Signs Emergency Declaration for Storms and Flooding

However, this diversion caused water levels to rise in McCook Lake. Around McCook Lake, roughly 50 homes sustained damage with some being swept away in the flood waters. Residents received an evacuation notice at 8:21 p.m. on June 23.[3] Figure 1 displays satellite imagery from the affected areas on June 24:

Figure 1: Satellite Map of Impacted Flood Area



Reference: South Dakota Flooding, June 20-22, 2024 – Climate Mainstreet

A Presidential declaration of disaster was issued on August 15, 2024, designating the event as DR-4807.[4] This declaration allowed residents of four counties (Davison, Lincoln, Turner, and Union) to apply for FEMA Individual Assistance (IA). In total, 1,126 individuals were approved for a total of $9,719,857.27 in assistance. Table 1 breaks down the approved IA funding as of April 29, 2025:[5]

[3] Nippert, Page. "South Dakota Flooding, June 20-22, 2024." HPRCC, 8/9/24. South Dakota Flooding, June 20-22, 2024 – Climate Mainstreet

[4] "President Joseph R. Biden, Jr. Approves Major Disaster Declaration for South Dakota." FEMA, 8/16/24. President Joseph R. Biden, Jr. Approves Major Disaster Declaration for South Dakota | FEMA.gov

[5] "South Dakota Severe Storms, Straight-line Winds, and Flooding." FEMA, 4/29/25. 4807 | FEMA.gov

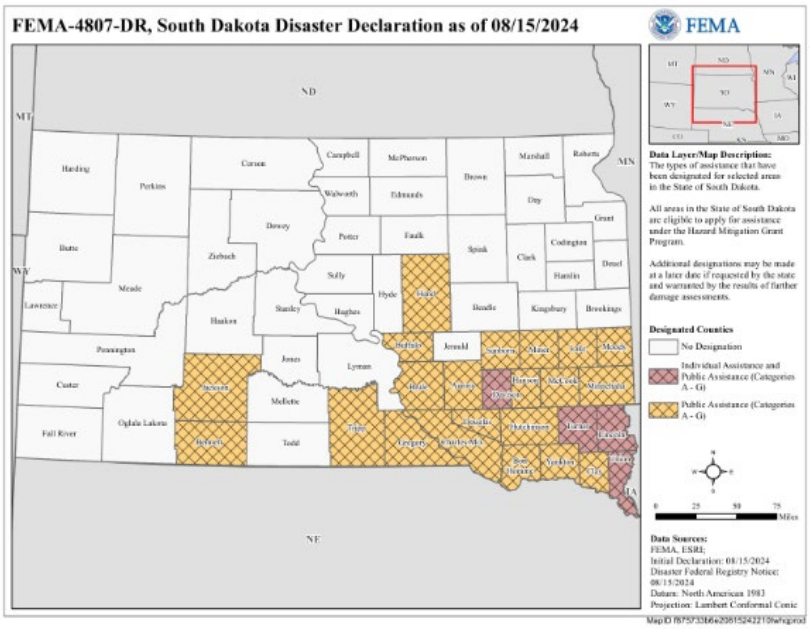
Table 1: Total FEMA IA Assistance DR-4807

Individual Assistance	Amount
Total Housing Assistance (HA) – Dollars Approved	$5,746,283.99
Total Other Needs Assistance (ONS) – Dollars Approved	$2,973,573.28
Total Individual & Households Program Dollars Approved	**$9,719,857.27**
Individual Assistance Applications Approved	1126

Reference: 4807 | FEMA.gov

In addition to FEMA IA, the declaration extended Public Assistance (PA) to state, local, and tribal governments (along with select non-profits) in 25 counties (Aurora, Bennett, Bon Homme, Brule, Buffalo, Charles Mix, Clay, Davison, Douglas, Gregory, Hand, Hanson, Hutchinson, Jackson, Lake, Lincoln, McCook, Miner, Minnehaha, Moody, Sanborn, Tripp, Turner, Union, and Yankton). Figure 3 displays counties designated for both FEMA IA and PA:[6]

Figure 3: FEMA Designated IA and PA Counties – DR-4807



Reference: Designated Areas | FEMA.gov

[6] "Designated Areas: Disaster 4807." FEMA, accessed 4/29/25. Designated Areas | FEMA.gov

1.2.1 HUD-Identified MID Areas

Pursuant to the 2025 Appropriations Act, HUD has identified Most Impacted and Distressed (MID) areas based on the best available data for all eligible affected areas. These areas are the least likely to fully recover without additional assistance. The MID areas for DR-4807 in South Dakota are limited to Union County ZIP codes 57038 and 57049. This covers the areas around Jefferson City and North Sioux City. These areas have the most significant unmet need resulting from DR-4807. GOED will describe the unmet need in these areas of Union County within this Action Plan. GOED is required to use at least 80% of the CDBG-DR award to benefit the areas in Union County as the HUD-identified MID areas. However, HUD encourages all grantees to consider using 100% of their awards to benefit HUD-identified MID areas since the data from these areas were used to determine the amount of the award.

1.2.2 Grantee-Identified MID Areas

GOED has not identified any state MID areas for the purposes of this Action Plan.

1.3 Overview of the Impacts of the Qualifying Disaster

Based on news reports from the time of the disaster, the major impacts from the eligible disaster appear to center around housing and infrastructure. In McCook Lake (Union County), over 50 homes were damaged or destroyed by flooding. The area lost power, gas and sewer service, and a police presence was stationed to keep residents from attempting to return to their damaged homes.[7]

Data collected regarding the effects of the disaster display a disproportionate level of impact to Union County (HUD-identified MID area). Infrastructure, especially roads and bridges, was heavily affected by the severe storms and flooding. For owner-occupied structures, 92.5% of the FEMA-identified “severe” damage occurred in Union County. Damage to homes and infrastructure in Union County is exemplified in the image in Figure 4 below.

[7] Tupper, Seth. “McCook Lake residents say their homes were sacrificed, and they want a new flood plan.” South Dakota Searchlight, 6/26/24. McCook Lake residents say their homes were sacrificed, and they want a new flood plan • South Dakota Searchlight

Figure 4: Flood Impacted Homes in North Sioux City

Reference: 2024 FLOOD INFORMATION | North Sioux City, SD

North Sioux City, within Union County, became the staging area for many FEMA operations, including a disaster recovery center and later an SBA office. Both offices were utilized to collect in-person applications for both FEMA IA and SBA assistance.[8]

Tables 2 and 3 below summarize the CDBG-DR allocation for the qualifying disaster, as well as the HUD-designated MID areas.

Table 2: Disaster Overview

Disaster Summary	
Qualifying Disaster:	DR-4807
HUD-Identified MID Areas:	Union County (ZIP codes 57038, 57049)
Grantee-Identified MID Areas	N/A

[8] "North Sioux City Disaster Recovery Center to Become SBA Disaster Loan Outreach Center." SBA. 10/1/24. North Sioux City Disaster Recovery Center to Become SBA Disaster Loan Outreach Center | U.S. Small Business Administration

Table 3: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview	
CDBG-DR Allocation:	$13,370,000
CDBG-DR Mitigation Set Aside:	$2,005,000
Total Allocation:	**$15,375,000**

II. Unmet Needs and Mitigation Needs Summary

2. Unmet Needs and Mitigation Needs Summary

2.1 Unmet Needs and Proposed Allocations

Table 4: 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 (Excluding the 15% Mitigation Set-Aside)
Administration (5% cap)	N/A	N/A	N/A	$768,750	5%
Planning (15% cap)	N/A	N/A	100%	$2,306,250	15%
Rental Housing	$0	0%	0%	$0	0%
Owner-Occupied Housing[9]	$3,122,807	5%	0%	$0	0%
Infrastructure[10]	$59,579,583	94%	100%	$12,300,000	80%
Economic Revitalization	$515,963	1%	0%	$0	0%
Public Service (15% cap)	$0	0%	0%	$0	0%
Exempt Public Service (no cap)	$0	0%	0%	$0	0%
Total	**$63,218,353**	**100%**	**0%**	**$15,375,000**	**100%**
Funds that have not been allocated:				**$0**	**0%**

[9] Unmet needs derived from FEMA IA data and known projects that may require CDBG-DR funding. Data showed more need for owner-occupied housing than for rental housing.

[10] Unmet needs derived from FEMA PA data and known projects that may require CDBG-DR funding.

III. Unmet Needs Assessment

3. 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 South Dakota Governor's Office of Economic Development (GOED) 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)
- South Dakota Housing Development Authority (SD Housing)
- Local Governments

The data gathered allows GOED 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 consider work already accomplished for the recovery, community goals, and GOED's capacity to manage and implement the CDBG-DR programs. The assessment allows GOED to design recovery programs that are responsive to the actual remaining needs on the ground.

Table 5 displays an overview of the direct/indirect needs, financial assistance budgeted and obligated to those needs, and the remaining unmet need across seven major cost categories.

Table 5: Quantified Disaster Impacts and Exacerbated Pre-Existing 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 - B. Unmet Need
Emergency Shelters, Interim, and Permanent Housing	$0.00	$0.00	$0.00
Rental Housing	$0.00	$0.00	$0.00
Owner-Occupied Housing	$6,122,807	$3,000,000	$3,122,807
Public Housing and Other Affordable Housing	$0.00	$0.00	$0.00
Infrastructure	$74,219,583	$18,940,000	$59,579,583
Economic Development	$1,570,263	$1,054,300	$515,963
Public Service	$0.00	$0.00	$0.00
Total	**$81,912,653**	**$22,994,300**	**$63,218,353**

3.1 Housing Recovery

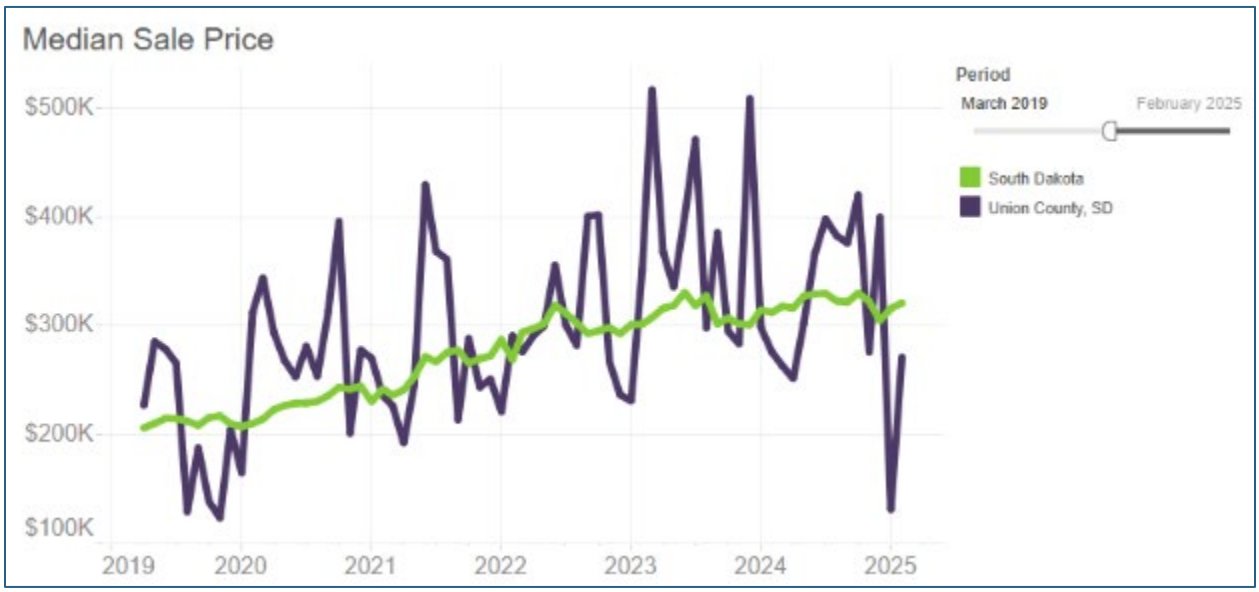
The housing needs assessment uses the following methods: public FEMA data and unmet needs identified by key stakeholders. The housing unmet needs assessment represents the impact on housing that needs to be rehabilitated, reconstructed, or newly built.

The data collected displays the impact of the disaster on the existing housing market. From June 2023 (a year before the disaster event) to June 2024, median housing prices in the HUD-identified MID Union County did not fall below $350,000, but after the disaster and a brief uptick in median housing price, it fell to $130,000 in December 2024.[11] This is the lowest the Union County median home sale price has been since November 2019.

Figure 5 below displays the median sale price of homes in Union County overlayed with the same data for all of South Dakota. The steep drop in median sale price for Union County in December 2024 is in stark contrast to the trend of the state housing market overall.

[11] "Redfin Monthly Housing Market Data." Data Center, Redfin. Downloadable Housing Market Data - Redfin. Accessed 4/28/2025

Figure 5: Median Home Sale Price in Union County, SD



Reference: Redfin Monthly Housing Market Data

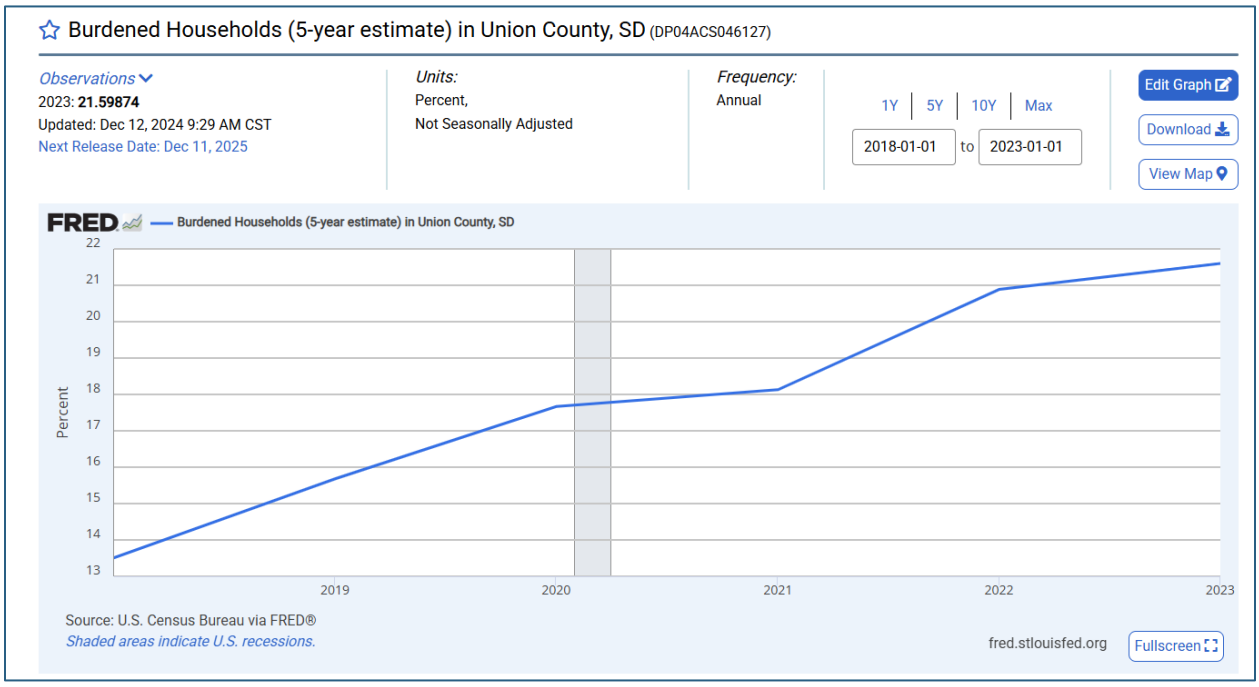
With the 2024 disaster resulting in the damage of thousands of homes, the housing stock in the MID county is adversely affected. Over 92% of all damage to owner-occupied units designated as "severe" occurred in Union County. In addition to the limitation of housing stock as an effect of the disaster, the need for housing options in Union County is steadily increasing due to population growth (16.8% between 2010 and 2020).

With 86% of reported losses from FEMA IA applicants across the four disaster-impacted counties being single-family homeowner properties, widespread impacts to the area housing market will continue to be felt. Of those homeowners, over 96% (1,224) did not have flood insurance.

The share of cost-burdened (where more than 30% of income goes towards housing costs) households in Union County has also been steadily increasing, as displayed by Figure 6 below.[12] It is to be expected that the 2024 disaster will only exacerbate this issue.

[12] "Burdened Households (5-year estimate) in Union County, SD." Federal Reserve Bank of St. Louis (FRED). Updated: Dec 12, 2024 9:29 AM CST. Burdened Households (5-year estimate) in Union County, SD (DP04ACS046127) | FRED | St. Louis Fed

Figure 6: Cost-Burdened Households in Union County



Reference: Burdened Households

The tables within section 3.1.1 provide the details about housing applicants impacted by the June–July 2024 flooding, assistance, losses by owners and renters, flood insurance paid out, and impacts by different housing types.

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

Data pulled from FEMA about the IA program shows that both owner-occupied housing and rental housing units were impacted. Four counties in South Dakota were declared eligible for FEMA IA: Davison, Lincoln, Turner, and Union. The data presented in this section therefore reflects information for all four counties. Given the amount of funds from the Individuals and Households Program (IHP) that were recorded as disbursed to applicants, there was no unmet need remaining for renters. However, for owner-occupied applicants, there was a remaining unmet need in Union County, contributing to its designation as a HUD MID area.

Across the impacted counties receiving FEMA IA funds, data below shows that most of the verified losses were seen in Union County. With regard to housing damage, most applicants appear to have experienced minor damage.

Many residents in the impacted areas did not have flood insurance before the disaster. For residents that did receive some form of National Flood Insurance Program (NFIP) payout,

most resided in Union, Minnehaha, or Davison counties. Based on the data, many residents without flood insurance likely still need support with recovering from the disaster.

Tables 6 and 7 show FEMA IA data between owner-occupied and rental applicants. These tables both display key data, including the total number of applicants and the total verified loss by occupant type. The owner-occupied applicants make up the vast majority of the total FEMA IA applicants across counties. As illustrated below, the majority of the total FEMA-verified loss occurred in Union County.

Table 6: FEMA IA Owner-Occupied Applicants

County	# of Applicants	# of Inspections	# Inspected With Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Davison	414	396	41	353	$1,637,934	$3,956
Lincoln	458	426	55	393	$1,628,623	$3,556
Turner	121	107	11	98	$674,718	$5,576
Union	**280**	**257**	**42**	**214**	**$7,647,687**	**$27,313**
TOTAL	**1,273**	**1,186**	**149**	**1,058**	**$11,588,962**	**$40,402**

Reference: FEMA Individual Assistance Data

Table 7: FEMA IA Tenant Applicants

County	# of Applicants	# of Inspections	# Inspected With Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Davison	50	29	16	20	$22,374	$447
Lincoln	41	31	5	27	$55,169	$1,346
Turner	6	3	1	2	$1,786	$298
Union	**34**	**26**	**11**	**17**	**$51,222**	**$1,507**
TOTAL	**131**	**89**	**33**	**66**	**$130,551**	**$3,597**

Reference: FEMA Individual Assistance Data

Tables 8 and 9 display the number of FEMA IA applicants across housing type, displaying the vast majority of applicants reside in a single-family house or duplex.

Table 8: FEMA IA Applications by Housing Type

Housing Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	54	0.00%	41.22%	0.00%	3.83%
Condo	1	0.08%	0.00%	0.00%	0.07%
House/Duplex	1,289	95.84%	48.09%	85.71%	91.35%
Mobile Home	34	2.59%	0.76%	0.00%	2.41%
Other	28	1.34%	7.63%	14.29%	1.98%
Townhouse	3	0.08%	1.53%	0.00%	0.21%
Travel Trailer	2	0.08%	0.76%	0.00%	0.14%

Table 9: FEMA IA Applications by Housing Type: Union County Only

Housing Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	9	0.00%	26.47%	0.00%	2.85%
Condo	1	0.36%	0.00%	0.00%	0.32%
House/Duplex	284	93.21%	64.71%	50.00%	89.87%
Mobile Home	11	3.93%	0.00%	0.00%	3.48%
Other	8	2.14%	2.94%	50.00%	2.53%
Townhouse	1	0.00%	2.94%	0.00%	0.32%
Travel Trailer	2	0.36%	2.94%	0.00%	0.63%

Reference: FEMA Individual Assistance Data

In Table 10, FEMA-categorized damage to owner-occupied units is summarized across counties. The majority of "severe" damage was to structures in Union County. This is in keeping with the data in Table 6 where the vast majority of FEMA-verified loss was contained to Union County.

Table 10: FEMA Real Property Damage – Owner-Occupied Units

County	Major-High	Major-Low	Minor-High	Minor-Low	Severe
Davison (County)	22	26	68	298	0
Lincoln (County)	14	12	88	342	2
Turner (County)	11	10	17	80	3
Union (County)	**38**	**32**	**29**	**119**	**62**
TOTAL	**85**	**80**	**202**	**839**	**67**

Reference: FEMA Individual Assistance Data

Table 11 displays the FEMA-categorized damage severity for rental units across the impacted counties. In comparison to the owner-occupied damage displayed in Table 10 there were relatively low numbers of major-high and severe damage to rental units.

Table 11: FEMA Real Property Damage – Rental Units

County	Major-High	Major-Low	Minor-High	Minor-Low	Severe
Davison (County)	3	1	0	46	0
Lincoln (County)	6	5	4	26	0
Turner (County)	0	0	1	5	0
Union (County)	**5**	**4**	**5**	**19**	**1**
TOTAL	**14**	**10**	**10**	**96**	**1**

Reference: FEMA Individual Assistance Data

In Table 12, the number of homeowners with and without flood insurance is broken out by county. The majority of homeowners in every county were not in possession of flood insurance at the time of the disaster.

Table 12: Homeowners with Flood Insurance by County

County	Homeowners without Flood Insurance	Homeowners with Flood Insurance	Total Homeowners
Davison (County)	403	11	414
Lincoln (County)	447	11	458
Turner (County)	110	11	121
Union (County)	**264**	**16**	**280**
TOTAL	**1,224**	**49**	**1,273**

Reference: FEMA Individual Assistance Data

In Table 13, the number of homeowners with and without flood insurance is broken down by income. As income increases, the percentage of homeowners with flood insurance also increases but never rises above 2% of those within a given income category. Table 14 provides figures for homeowners in Union County only.

Table 13: Owner-Occupied Units with and without Flood 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	115	9.03%	4	0.31%	119
<$15,000	23	1.81%	1	0.08%	24
$15,000-$30,000	106	8.33%	2	0.16%	108
$30,001-$60,000	253	19.87%	6	0.47%	259
$60,001-$120,000	453	35.59%	19	1.49%	472
$120,001-$175,000	165	12.96%	10	0.79%	175
>$175,000	109	8.56%	7	0.55%	116
TOTAL	**1,224**	**96.15%**	**49**	**3.85%**	**1,273**

Table 14: Owner-Occupied Units with and without Flood Insurance – Union County Only

County	Homeowners without Flood Insurance	Percentage of Total without Flood Insurance	Homeowners with Flood Insurance	Percentage of Total with Flood Insurance	Total Homeowners
Union (County)	298	94.3%	18	5.7%	316

Reference: FEMA Individual Assistance Data

Table 15 displays the NFIP payments to homeowners across counties. Relative to the total number of FEMA IA recipients, the rate of NFIP recipients is low but in step with the overall low percentage of individuals with flood insurance policies. In accordance with previous data, the payment amounts are highest for Union County even with a lower number of overall payments, indicating the most severe damage was contained to the MID areas.

Table 15: NFIP Payments by County

County	# of Homeowners	Payment (for Building)	Payment (for Contents)	Total Payment
Clay	1	$1,000	$1,000	$2,000
Davison	10	$611,030	$203,805	$814,834
Hutchinson	2	$15,660	$810	$16,470
Lincoln	9	$498,482	$27,418	$525,900
McCook	5	$74,802	$183	$74,985
Minnehaha	22	$760,070	$107,257	$867,326
Turner	8	$580,566	$94,688	$675,254
Union	14	$1,778,355	$392,013	$2,170,367
TOTAL	**71**	**$4,319,964**	**$827,173**	**$5,147,137**

Reference: FEMA National Flood Insurance Program Data

Table 16 shows the number of manufactured housing units impacted by the disaster. Broken out by county, the number of units damaged is a low percentage of the units in the respective counties.

Table 16: Manufactured Housing Units Impacted by Disaster

County	# of Units	% of Total Units in County
Davison (County)	18	3.95%
Lincoln (County)	3	0.87%
Turner (County)	2	1.55%
Union (County)	11	4.01%
TOTAL	**34**	**2.83%**

Reference: FEMA Individual Assistance Data

3.1.2 Total Home Loans Approved 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.

Table 17: Total Disaster Home Loans Approved by SBA

Verified Losses					
County	# of Home Loans	Mitigation	Contents	Real Estate	Relocation
Davison	10	-	$147,346.21	$306,704.46	-
Hutchinson	1	-	$21,277.20	$65,902.58	
Lincoln	18	-	$308,854.36	$649,358.53	-
Turner	3	$5,300.00	$32,036.40	$161,619.55	-
Union	37	$11,000.00	$1,547,260.36	$4,877,243.12	$431,728.00
Clay	1	-	$30,909.60	$47,868.67	
TOTAL*	**68**	**$16,300.00**	**$2,087,684.13**	**$6,108,696.91**	**$431,728.00**

Reference: SBA Data Disaster Home Loan Applications – SD 20000, 20001, 20002 *Count includes loans in the following status: approved, completed, or under review.

3.1.3 Public Housing and Other Affordable Housing

HUD's Multifamily Housing property portfolio consists primarily of rental housing properties with five or more dwelling units such as apartments or townhouses, 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.

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 Public Housing Agencies (PHAs) that manage housing for low-income residents at rents they can afford.

Table 18 shows the number of multifamily HUD-assisted housing units that could have been disaster-impacted. None were located within the HUD-MID areas.

Table 18: Multifamily HUD-Assisted Housing

County	# of Properties	# of Units	# of Units Assisted	# of Units Awaiting Assistance
Clay	3	108	107	1

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

Table 19 displays the number of PHAs damaged by the disaster. No PHAs were located in the HUD-MID areas.

Table 19: Public Housing Agencies (PHAs) Damaged

County	PHA Name	PHA Code	No. of Units	Units Damaged
Clay	Vermillion Housing and Redevelopment Commission	SD055	299	-

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

Table 20 displays that across 20 impacted counties, there is no remaining unmet need for those in HUD-assisted housing.

Table 20: HUD-Assisted Housing Impacted by Disaster

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Beadle	164	0	0	0	0	0	0
Brookings	186	0	0	0	0	0	0
Brown	456	0	0	0	0	0	0
Butte	74	0	0	0	0	0	0
Clay	121	0	0	0	0	0	0
Codington	123	0	0	0	0	0	0
Davison	86	0	0	0	0	0	0
Day	12	0	0	0	0	0	0
Fall River	14	0	0	0	0	0	0
Grant	32	0	0	0	0	0	0
Hughes	139	0	0	0	0	0	0
Lake	76	0	0	0	0	0	0
Lawrence	246	0	0	0	0	0	0

Lincoln	154	0	0	0	0	0	0
Meade	111	0	0	0	0	0	0
Minnehaha	1,719	0	0	0	0	0	0
Pennington	1,393	0	0	0	0	0	0
Spink	38	0	0	0	0	0	0
Walworth	65	0	0	0	0	0	0
Yankton	122	0	0	0	0	0	0
TOTAL	**5,331**	**0**	**0**	**0**	**0**	**0**	**0**

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

3.1.4 Emergency Shelters, Interim, and Permanent Housing

HUD annually publishes the Continuum of Care (CoC) Homeless Assistance Programs Dashboard Reports that show CoC geographic areas and geographic coverage changes from the previous program year and include 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 21 displays the total South Dakota number of individuals experiencing homelessness.

Table 21: Affected Continuum of Care (CoC) Entities

CoC Number	CoC Entity	Impacted County	Homeless Count
SD-500	South Dakota Statewide CoC	Statewide	1,338

Reference: South Dakota 2024 Point-In-Time Homeless Count, HUD's CoC Dashboard Reports, HUD's CoC Homeless Populations and Subpopulations Reports

In Table 21, the number of individuals experiencing homelessness is broken out by location relative to the disaster as well as the current form of shelter they have. This information was available at a statewide level from SD Housing. Totals for the FEMA-declared and HUD-MID areas were not available.

Table 22: Point-in-Time Count – Impacted by Disaster & Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide	912	199	227	1,338

Reference: South Dakota 2024 Point-In-Time Homeless Count, South Dakota - Sioux Falls Point in Time

3.2 Infrastructure

Infrastructure in the HUD-MID areas was also significantly impacted due to the disaster event: "[Roads] were washed out, sinkholes opened up, a railroad bridge was destroyed."[13] Residents of the McCook Lake area were without power, gas, and sewer service due to the event.[14] FEMA PA funding was made available to support these recovery efforts.

From FEMA reports and assessments done following the 2024 disaster event, it is estimated that at least $26.9 million in damage was caused to infrastructure and facilities as a result of the severe storms and flooding. The infrastructure of Union (HUD-designated MID area) and Lincoln counties was especially hard hit, with $4.6 million and $4.3 million in damage, respectively.

Roads and bridges in particular were disproportionately affected. Out of the PA-funded projects, over 69% (259 of 374) were related to road and bridge restoration. Of all PA dollars distributed, nearly 68% of funded projects were for roads and bridges.

Table 23 captures the number of projects and their respective cost across all FEMA PA categories. The majority of projects were Category C (Roads and Bridges) and have the highest share of the project costs and federal share.

Table 23: FEMA Public Assistance Program

Code Category	PA Category	# of Projects	Project Cost	Federal Share	Non-Federal Share
A	Debris Removal	41	$1,872,654	$1,404,491	$468,163
B	Emergency Protective Measures	37	$2,038,723	$1,529,042	$509,681
C	Roads and Bridges	259	$18,263,315	$13,697,487	$4,565,828
D	Water Control Facilities	4	$444,886	$333,665	$111,222
F	Utilities	17	$3,067,760	$2,300,820	$766,940
G	Parks, Recreational Facilities, and Other Items	16	$1,190,997	$893,248	$297,749
TOTAL		**374**	**$26,878,336**	**$20,158,753**	**$6,719,583**

Reference: FEMA Public Assistance Data

In Table 24 FEMA PA funds are broken out by county. The highest dollar amount across all three cost categories is for Union County, where the HUD-declared MID ZIP codes are located.

[13] https://southdakotasearchlight.com/2024/06/24/homes-and-roads-in-mccook-lake-area-ravaged-by-flooding/

[14] https://hprcc.unl.edu/blog/2024/08/09/south-dakota-flooding-june-20-22-2024/

Table 24: FEMA Public Assistance Program by County and Category

County	Project Cost	Federal Share	Non-Federal Share
Aurora County	$930,227	$704,832	$225,395
Bennett County	$18,626	$14,191	$4,435
Bon Homme County	$499,033	$380,216	$118,817
Brule County	$371,801	$281,775	$90,026
Buffalo County	$765,763	$574,323	$191,441
Charles Mix County	$889,431	$668,254	$221,176
Clay County	$2,605,756	$1,957,163	$648,594
Davison County	$1,390,398	$1,049,711	$340,687
Douglas County	$354,066	$267,109	$86,957
Gregory County	$1,054,840	$791,130	$263,710
Hand County	$96,526	$72,875	$23,651
Hanson County	$494,224	$373,269	$120,955
Hutchinson County	$1,424,520	$1,072,275	$352,245
Lake County	$389,554	$292,165	$97,388
Lincoln County	$4,265,787	$3,224,329	$1,041,458
McCook County	$999,257	$752,843	$246,414
Miner County	$150,985	$113,364	$37,621
Minnehaha County	$1,236,655	$929,880	$306,775
Moody County	$56,641	$42,754	$13,887
Sanborn County	$84,609	$63,845	$20,764
Statewide	$1,605,518	$1,233,666	$371,851
Tripp County	$211,936	$159,568	$52,368
Turner County	$2,360,677	$1,778,288	$582,389
Union County	**$4,555,927**	**$3,422,877**	**$1,133,050**
Yankton County	$515,078	$387,550	$127,528
Grand Total	**$27,327,835**	**$20,608,252**	**$6,719,583**

Reference: FEMA Public Assistance Data

The FEMA PA data provides information on funding provided to the state to address infrastructure needs and the non-federal share required by the local governments. However, it does not provide a comprehensive picture of the total need to rebuild and recover the infrastructure across the MID areas. To rebuild in a resilient manner to help mitigate future disasters, GOED plans to require that all infrastructure projects incorporate resiliency and mitigation features. This focus on resiliency is supported by the local governments, with North Sioux City Administrator Jeff Dooley stating the city is "considering building greenways, culverts and storm sewer pipes along affected roads — capitalizing on some of the channels carved by the flood — to better direct future floodwaters into

McCook Lake."[15] This will inevitably increase the amount of unmet need for infrastructure in order to meet these more resilient standards.

Additionally, in consultations with state and local partners, GOED has identified additional infrastructure needs. Specifically, North Sioux City has identified an additional $52.8 million in infrastructure recovery needs in the area. This figure includes two lift station projects, road and trail repairs, property acquisitions, and significant restoration and mitigation to McCook Lake, all of which are directly tied to storm impacts and will support a more resilient recovery.

In total, GOED has identified a quantifiable unmet recovery need for infrastructure of $59,579,583 resulting from the DR-4807; however, this figure will be used as a minimum by GOED in order to plan additional costs that result from implementing resiliency and mitigation measures for a full infrastructure recovery.

3.3 Economic Revitalization

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

Following the 2024 severe storms and flooding and the Presidential declaration of a major disaster for the state of South Dakota, SBA issued three disaster numbers, SD-20000, SD-20001, and SD-20002, to capture all loans for physical damage and economic injury. For South Dakota, residents in Aurora, Bennett, Bon Homme, Brule, Buffalo, Charles Mix, Clay, Davison, Douglas, Gregory, Hand, Hanson, Hutchinson, Jackson, Lake, Lincoln, McCook, Miner, Minnehaha, Moody, Sanborn, Tripp, Turner, Union, and Yankton were eligible to apply for these loans.

Table 25 below shows the dollar amount associated with business loans approved by SBA. Total combined contents and real estate loss were highest in Union County.

Table 25: Total Business Loans Approved by the SBA

County	# of Business Loans	Verified Contents Loss	Verified Real Estate Loss
Davison	4	$221,500.00	$22,486.84
Lincoln	13	$39,344.00	$509,824.21
Minnehaha	4	-	-
Union	**5**	**$150,200.00**	**$614,278.56**
Yankton	6	$4,978.40	-

[15] Huber, Mackenzie. "After McCook Lake disaster, local officials ask Corps of Engineers to help with new flood plan." South Dakota Searchlight. 3/30/25, https://southdakotasearchlight.com/2025/03/30/mccook-lake-disaster-local-officials-corps-of-engineers-help-new-flood-plan/

TOTAL*	**32**	**$416,022.40**	**$1,146,589.61**

Reference: SBA Data Disaster Business Loan Applications – SD 20000, 20001, 20002 *Count includes loans in the following status: approved, completed, or under review.

3.4 Public Services

There is currently no identified unmet need for public services. If GOED determines that a public service unmet need requiring CDBG-DR funding arises, this section will be revised to reflect that need.

3.5 Conclusion

GOED has taken careful steps to gather, collect, and analyze data across federal, state, and local resources to identify where South Dakotans have faced impacts from the declared disaster and what types of needs persist.

The data displayed through the course of the unmet needs review points to clear remaining needs, especially within the HUD MID areas of Union County, which continue to affect residents throughout the impacted area. Through the assessment of these remaining needs as well as consultations with local community members, GOED has identified the priority of needs. Without the ability to rely on infrastructure, residents will not be able to fully recover from the disaster events. GOED will use this data to construct programs to support community recovery and resiliency where data displays the greatest need.

IV. Mitigation Needs Assessment

4. Mitigation Needs Assessment

4.1 Overview

In accordance with HUD guidance, the State of South Dakota completed the following Mitigation Needs Assessment. The State reviewed existing hazard plans, and past state and regional action plans, 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 50 presidentially declared disasters in the State of South Dakota since 1995.[16] The most common natural disasters that cause damage to an extent that results in a federal disaster declaration are severe storms, severe winter storms/ice storms, tornadoes, and flooding. Since 1995, there have been 26 declared severe storm-related disasters (excluding severe winter storms), 28 flooding disasters, and 12 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 South Dakota 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 2,533 claims totaling over $59,575,922.21 in South Dakota since 1995.[17] In Union County, the federally declared MID county, there have been 198 NFIP claims, totaling over $7,389,132.20 since 1995. 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, the projects 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

[16] Disasters and Other Declarations, 2025 FEMA.gov, https://www.fema.gov/disaster/declarations?field_dv2_declaration_date_value%5Bmin%5D=1995&field_dv2_declaration_date_value%5Bmax%5D=2025&field_dv2_declaration_type_value=DR&field_dv2_incident_type_target_id_selective=All&field_dv2_state_territory_tribal_value%5B0%5D=SD&page=4

[17] Historical NFIP Claims and Trends, FEMA & NFIP, 2024, https://www.floodsmart.gov/historical-nfip-claims-information-and-trends?map=countries/us/us-sd-all&region=us-sd&miny=1995&maxy=2024&county=&gtype=state

business and government functions and/or are critical to human health and safety and economic security.

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

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	$74,219,583	$18,940,000	$59,579,583
Economic Development	$0.00	$0.00	$0.00
Planning	$0.00	$0.00	$0.00
Total	$74,219,583	$18,940,000	$59,579,583

4.2 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 South Dakota from 1980 to 2025 (CPI-Adjusted)

Disaster Type	Events	Events per Year	Percentage Frequency	Total Costs	Percentage of Total Costs
Severe Storm	15	0.3	41.7%	$2.0B-$5.0B	10.1%
Drought	13	0.3	36.1%	$10.0B-$20.0B	64.5%
Flooding	5	0.1	13.9%	$5.0B-$10.0B	24.8%
Wildfire	2	0.0	5.6%	$100M-$250M	0.5%
Freeze	1	0.0	2.8%	$5M-$100M	0.1%
All Disasters	**36**	**0.8**	**100.0%**	**$20.0B-$50.0B**	**100.0%**

Source: National Centers for Environmental Information, NOAA, 2025

To align the NCEI data above with the State of South Dakota's 2024 Enhanced Hazard Mitigation Plan and Union County's 2024 Pre-Disaster Mitigation Plan, this Mitigation Needs Assessment will include:

- Freeze/extreme cold events within the winter storm hazard profile
- Drought and extreme heat events grouped together
- Tornado hazard profile as a separate profile from severe storms (as this hazard has historical significance and relevance when considering the impact of DR-4807)
- Geological hazards as a separate profile (although not specifically identified in NCEI data, they are explicitly mentioned in the mitigation plans of both the State and Union County, the MID county)

The greatest risk hazards identified are:

1. Severe Storm
2. Drought & Extreme Heat
3. Flooding

4. Tornado & High Wind
5. Wildfire
6. Winter Storm & Extreme Cold
7. Geological Hazards

4.2.1 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 Storm Events Database of NCEI. 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:[18]

- 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.

4.2.2 Severe Storm

"Severe storm" is an umbrella term used to describe instances of lightning, damaging winds, hail, tornadoes, and flooding. 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.

According to the National Severe Storms Laboratory, a storm is considered "severe" when it contains one or more of the following: hail 1 inch or greater in diameter, winds gusting more than 57.5 miles per hour, or a tornado. The extent and magnitude of certain storms can be classified on different scales. Severe summer storms are not limited to one area of the State and historically occur from early spring to early fall. Summer storms can include

high winds, heavy rains and flooding, lightning, and hail; they can also spur the development of funnel clouds and tornadoes. They can vary in intensity from mild to severe, and can cause injury or death, destroy property, and kill livestock. Winds, flooding, and tornadoes are discussed further in other sections. This section covers two types of hazards caused by severe summer storms: lightning and hail. The impact of summer storms on vulnerable populations can be especially severe. Individuals and families may have fewer financial resources to prepare for or recover from a summer storm, and they may be more likely to be uninsured or underinsured. Individuals with disabilities may need more time to take cover, so evacuation notices need to be issued as soon as feasible and communicated by multiple inclusive methods.

4.2.2.1 Lightning

Lightning is defined as all of the various forms of visible electrical discharge caused by thunderstorms. Cloud-to-ground lightning can kill or injure people by direct or indirect means. Objects can be struck directly, which may result in an explosion, burn, or total destruction of the object or structure. Damage may also be indirect when the current passes through or near an object, which generally results in less damage. Cloud-to-ground lightning is the most damaging and dangerous type of lightning. Most flashes originate near the lower-negative charge center and deliver negative charge to earth. However, a large minority of flashes carry positive charge to earth. These positive flashes often occur during the dissipating stage of a thunderstorm's life. Positive flashes are also more common as a percentage of total ground strikes during the winter months. This type of lightning is particularly dangerous for several reasons. It frequently strikes away from the rain core, either ahead or behind the thunderstorm. It can strike as far as 5 or 10 miles from the storm in areas that most people do not consider to be a threat. Positive lightning also has a longer duration, so fires are more easily ignited. Additionally, when positive lightning strikes, it usually carries a high peak electrical current, potentially resulting in greater damage.

NCEI records include 124 lightning incidents in South Dakota between 1996 and 2020 (note that NCEI only counts lightning strikes that were significant enough in some way to be reported; the actual number of lightning strikes is undoubtedly far higher). These recorded lightning strikes caused $4,892,200 in property damage and $5,000 in crop damage; five fatalities and 19 injuries were attributed to these events.[19] The Union County Planning Team believes that lightning has a moderate classification on the scientific scale, moderate

[19] South Dakota Enhanced Hazard Mitigation Plan, 2024, https://dps.sd.gov/application/files/3817/1440/7996/sd-enhanced-hazard-mitigation-plan-2024-r.pdf

speed of onset, or moderate duration of events, resulting in some damage and loss of services for days. According to the National Risk Index, Union County's risk of lightning is relatively low. The National Risk Index indicates that Union County's Expected Annual Loss due to lightning is valued at $56,377.[20] No study has explicitly forecasted the future occurrence of lightning in South Dakota. This is a gap in knowledge. It is unclear whether this gap affects the ability to plan for this hazard. Evaluating past occurrence of lightning can allow at least a somewhat enlightened, and perhaps adequate, approach to envisioning the future of this hazard.

4.2.2.2 Hail

Exposure to large hail is a formidable danger to people who are outdoors and unable to take refuge. Some populations that are particularly vulnerable include people experiencing homelessness; the elderly and very young; tourists and visitors; and those with developmental, physical, or sensory disabilities. Large hail has the potential to cause significant bruising, concussions, broken bones, and even death. Large hail also has the potential to cause extensive damage to dwellings and possessions such as vehicles. The financial impact of hail on vulnerable populations is worthy of special consideration. Low-income populations are more likely to be uninsured or underinsured for hail damage, causing them to experience more severe financial hardships caused by hail. Individuals with disabilities may need more assistance after a major event, especially if transportation or utility services are disrupted. The average size of hail that was reported between 2019 and 2023 in Union County was 1.1 inches in diameter, which is equivalent to the size of a quarter or up to a half dollar. In some instances, there have been occasional reports of hail anywhere from walnut to softball size. According to the National Risk Index, Union County's risk of hail is relatively low. The National Risk Index indicates that Union County's Expected Annual Loss due to hail is valued at $267,929.[21] Damaging hail events occur sporadically throughout South Dakota, usually associated with severe summer storms and wind events. Hail is formed when water droplets freeze and thaw as they are circulated high into the upper atmosphere by the violent internal forces of thunderstorms. Recent studies suggest that super-cooled water may accumulate on frozen particles near the backside of a storm as they are pushed forward across and above the updraft by the prevailing winds near the top of the storm. Eventually, the hailstones encounter downdraft air or become too heavy to remain suspended and fall to the ground. Nationally, hail causes more than $1 billion of

[20] Union County Pre-Disaster Mitigation Plan, 2024, https://www.secog.org/2024%20Union%20County%20PDM%20Plan%20Update%20Final%2012.4.24.pdf

[21] Union County Pre-Disaster Mitigation Plan, 2024, https://www.secog.org/2024%20Union%20County%20PDM%20Plan%20Update%20Final%2012.4.24.pdf

property damage each year. Hail is often associated with severe storms within South Dakota. Severe hailstorms can be quite destructive, causing damage to roofs, buildings, automobiles, vegetation, and crops. Hailstones are usually less than 2 inches in diameter and can fall at speeds of 120 miles per hour (mph). The largest hailstone ever recorded fell in Vivian, South Dakota, on July 23, 2010, and measured approximately 8 inches in diameter.[22]

4.2.3 Drought & Extreme Heat

Droughts are a natural part of the climate system, and because the projected precipitation increases are expected to occur during the cooler months, South Dakota will remain vulnerable to periodic drought. Increases in evaporation rates due to rising temperatures may increase the rate of soil moisture loss and the intensity of naturally occurring droughts.[23] Statistically, drought is a deviation from "normal" hydrologic conditions based on weather records dating to the late 1800s. In this Action Plan, extreme heat is considered together with drought. Heat is not a necessary element of drought, but the two often exist together and compound negative effects. This is true in South Dakota, where drought is often accompanied by periods of extreme heat. FEMA considers extreme heat as a condition where air temperature hovers at least 10°F above the average high temperature for the region and lasts for several weeks. Heat, often associated with drought, is deadly. In the United States, about 175 people succumb to summer heat annually.[24]

According to the National Weather Service (NWS), among natural hazards, only the cold of winter — not lightning, hurricanes, tornadoes, floods, or earthquakes — takes a greater toll. Heat kills by taxing organisms beyond their ability to cope. Heat stress can overwhelm an animal's ability to shed heat through circulatory changes and sweating. In some cases, excessive sweating can cause dangerous chemical (salt) imbalance. When heat gain exceeds the level the body can remove, or when the body cannot compensate for fluids and salt lost through perspiration, the temperature of the body's inner core begins to rise, and heat-related illness may develop. Elderly persons, small children, those with chronic illnesses, those on certain medications or drugs, persons living with alcoholism, and persons with very high or low weight are particularly susceptible to heat reactions, especially during heat waves in areas where moderate climate usually prevails. No portion of the State of South Dakota is immune to drought conditions. Drought can create

[22] South Dakota Enhanced State Hazard Mitigation Plan, Section 3: Hazard Identification and Risk Assessment, 2024

[23] NOAA's 2022 State Climate Summaries, 2022, https://statesummaries.ncics.org/chapter/sd/

[24] South Dakota Enhanced Hazard Mitigation Plan, 2024, https://dps.sd.gov/application/files/3817/1440/7996/sd-enhanced-hazard-mitigation-plan-2024-r.pdf

conditions for more numerous and intense fires that quickly overwhelm local and state capacities for fire suppression.

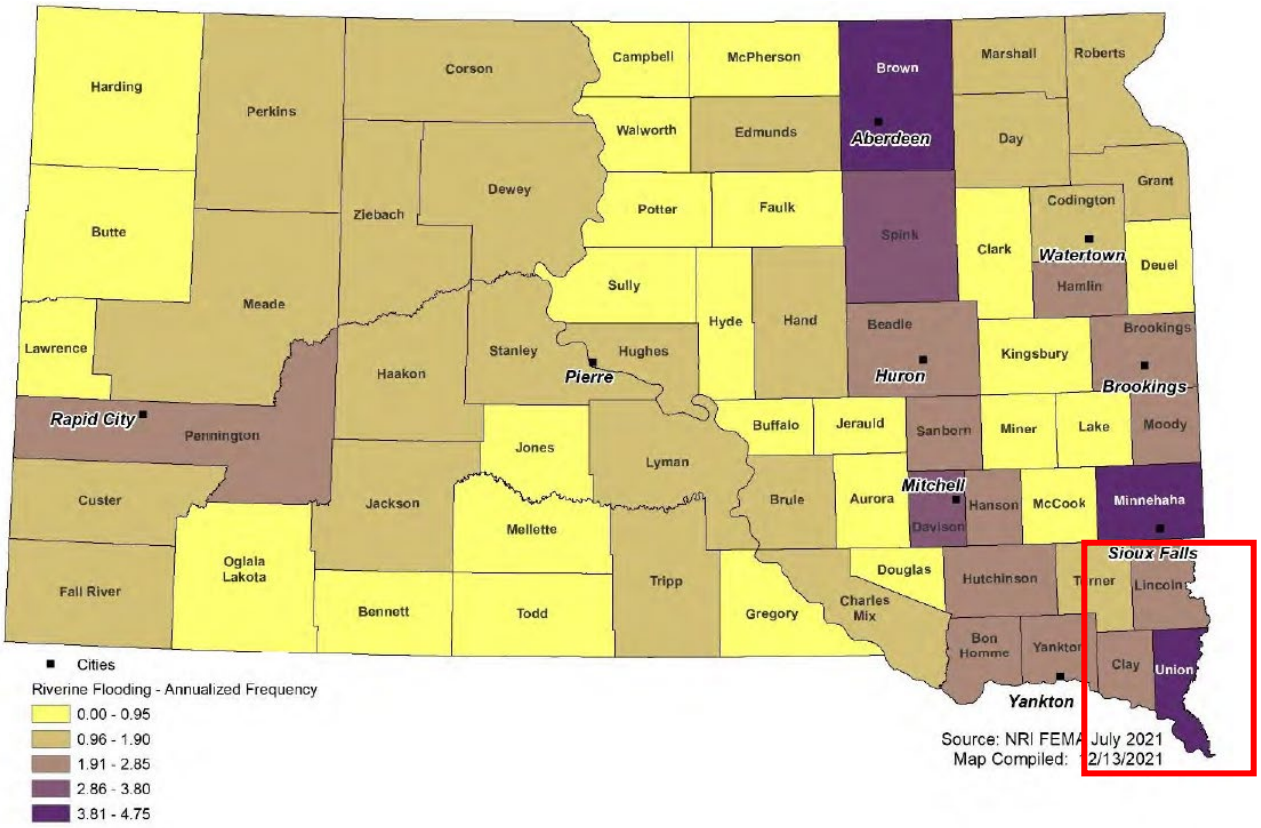
4.2.4 Flooding

According to the NOAA 2022 State Climate Summaries, annual precipitation is projected to increase, with the largest increases occurring during spring and winter. Increased winter and spring precipitation can impact South Dakota's agricultural economy both positively (increased soil moisture) and negatively (loss of soil nutrients, planting delays, and yield losses). Increases in the frequency and intensity of extreme precipitation events are also projected, potentially leading to increased runoff and flooding, which can reduce water quality and erode soils. Increased winter snowfall, rapid spring warming, and intense rainfall can combine to produce devastating floods.

4.2.4.1 Riverine Flooding

The National Risk Index (NRI) developed by FEMA includes a comparison of the annualized frequency of riverine flooding by county. The annualized frequency provides an estimate of the likelihood for future flood occurrences in South Dakota by taking the average number of recorded riverine flood events per year over the 24-year period of record from the NRI. This gives the estimated number of events per year by county, as shown in the Figure 7 map legend. Based on the NRI analysis, counties in the eastern half of the State and those along the Missouri River generally have a higher probability for flooding compared to the rest of the State. Figure 7 shows the annualized frequency of riverine flooding in counties across South Dakota in 2021. The MID county, Union County, is highlighted in the red box. This county is one of the three counties with the highest annual frequency of riverine flooding, with 3.81 to 4.75 average annual occurrences.

Figure 7: Annualized Frequency of Riverine Flooding by County, South Dakota 2021



Source: National Risk Index, Federal Emergency Management Agency, 2021, https://hazards.fema.gov/nri/map

4.2.4.2 Flash Flooding

According to the NWS, flash floods are the deadliest natural disaster in South Dakota. They are caused by stationary or slow-moving thunderstorms that produce heavy rain over a small area. Even on the prairie, normally dry draws and low spots can fill with rushing water during very heavy rain. Vulnerable populations in South Dakota include those that live within known floodplains or near areas vulnerable to flash floods as well as people traveling through or recreating in areas prone to flash flooding. Certain populations within these areas are particularly vulnerable. This includes people experiencing homelessness; the elderly and very young; those living in long-term care facilities, mobile homes, hospitals, prisons, low-income housing areas, or temporary shelters; people who do not speak English well; tourists and visitors; and those with developmental, physical, or sensory disabilities. The impacts of flooding on vulnerable populations can be more severe. Families may have fewer financial resources to prepare for or recover from a flood, and they may be more likely to be uninsured or underinsured. Individuals with disabilities may

need more time to evacuate, so evacuation notices will need to be issued as soon as feasible and communicated by multiple inclusive methods.

Figure 8: Ventusky GIS Precipitation in Inches on June 20, 2024

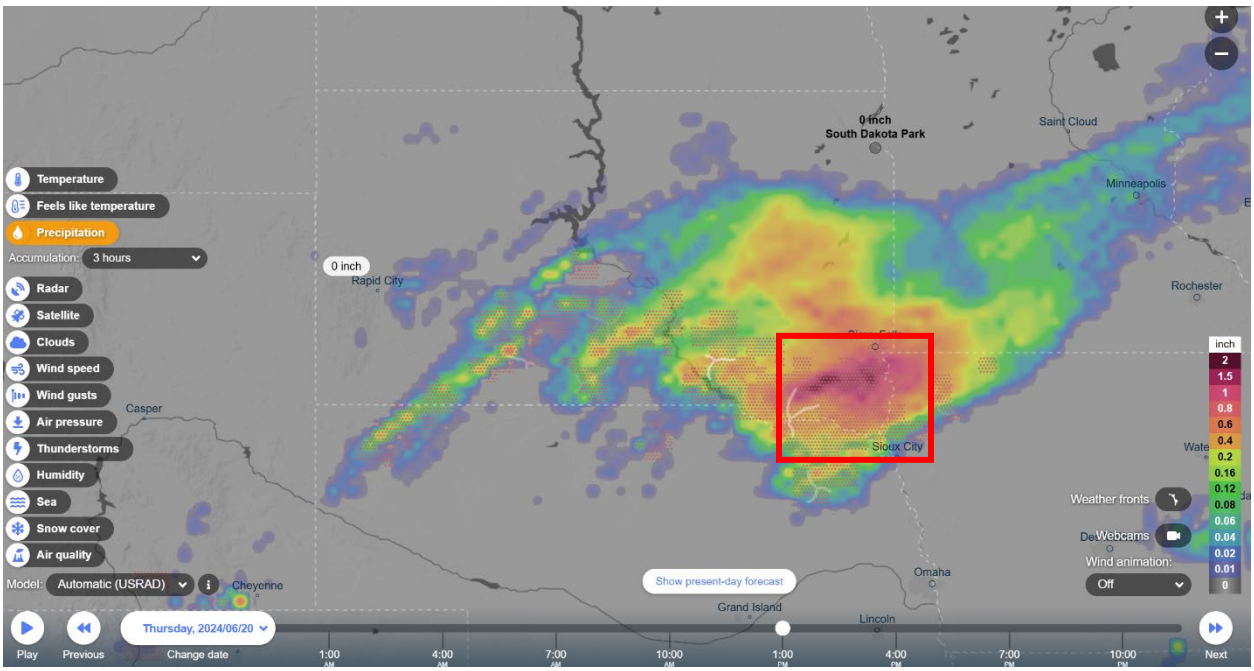


Figure 9: Ventusky GIS Precipitation in Inches on June 21, 2024

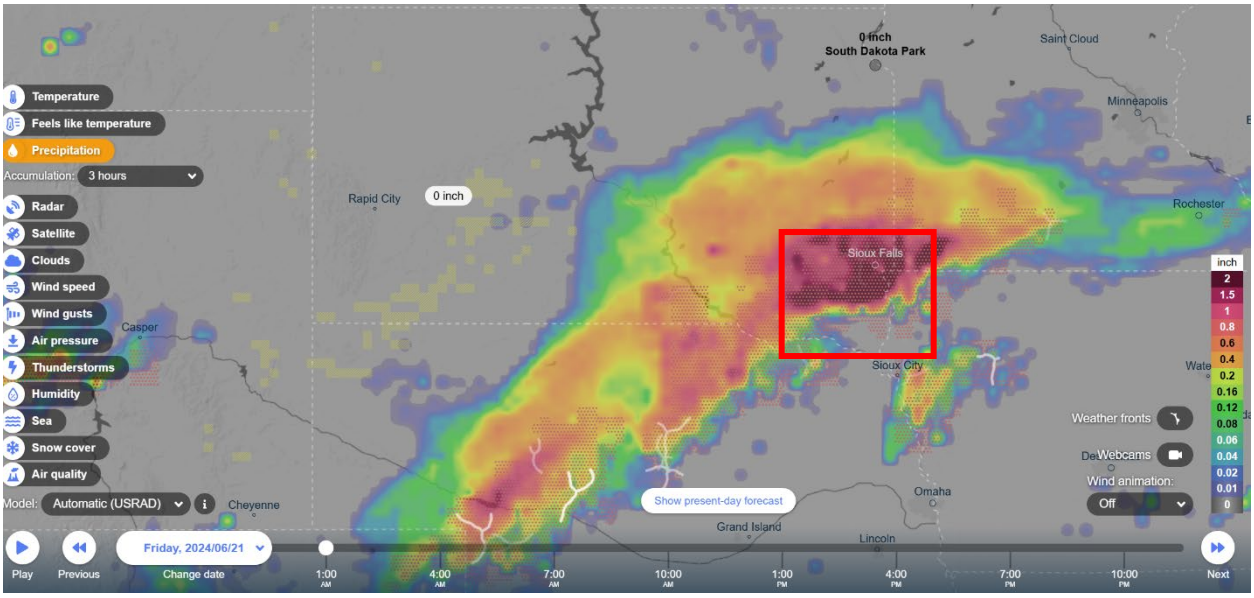


Figure 8 shows a storm system bringing 1-2 inches of precipitation through southeastern South Dakota in just three hours on June 20, 2024, at 1:00 p.m. Figure 9 shows additional precipitation bombarding the same area the next day, June 21, 2024, beginning at 1:00 a.m. and continuing throughout the day. This system, compounded with previous weeks of heavy rain, caused severe flash flooding in Union County (roughly indicated within the red square).

4.2.4.3 Ice Jams

Some of the largest floods that have occurred in South Dakota were the result of melting snow and ice. These large floods have occurred along the entire length of the Missouri River. The Great Flood of 1881 is probably the most well-known of all the floods to take place in South Dakota. Ice jams on the river caused the flooding to become extremely devastating, destroying large amounts of property and causing many lives to be lost. Towns such as Yankton, Vermillion, Burbank, Meckling, and Pierre were all severely damaged by the flooding. Winter storms can also generate flooding, usually because of ice jams or snowmelt, which can cause significant damage and loss of life. Ice jams form when long cold spells cause rivers and lakes to freeze and a rise in water level or a thaw breaks the ice into large chunks that become jammed at obstructions (e.g., a bridge). Water backs up at the jam, which is acting as a dam, and flooding results.

4.2.5 Tornado & High Wind

The NWS defines a tornado as a violently rotating column of air extending from a thunderstorm to the ground. The most violent tornadoes are capable of tremendous destruction with wind speeds of 250 mph or more. Damage paths can be more than 1 mile wide and 50 miles long. In an average year, about 1,000 tornadoes are reported across the United States, resulting in approximately 80 deaths and more than 1,500 injuries. Though climate data is available to explain a predisposition to tornadoes, there is no accurate way of predicting when or where a tornado may occur. Tornado systems have been linked to the development of temperature and wind flow patterns in the atmosphere, which can cause moisture, instability, lift, and wind shear. Expert predictions of these conditions begin first by modeling in the long term and relying on critical analysis of satellite data, weather stations, balloon packages, airplanes, wind profilers, and radar-derived winds to pinpoint storm activity for the short term. Tornado disasters are often associated with Tornado Alley (the area from the Gulf to the Northern Great Plains that has high tornado incidence). South Dakota sits in the northern region of Tornado Alley and is susceptible to the specific conditions to which the formation of tornadoes has been attributed: warm Gulf air meeting cool Canadian air fronts and dry air systems from the Rocky Mountains. The intersection of these three systems produces thunderstorm conditions that can spawn tornadoes.

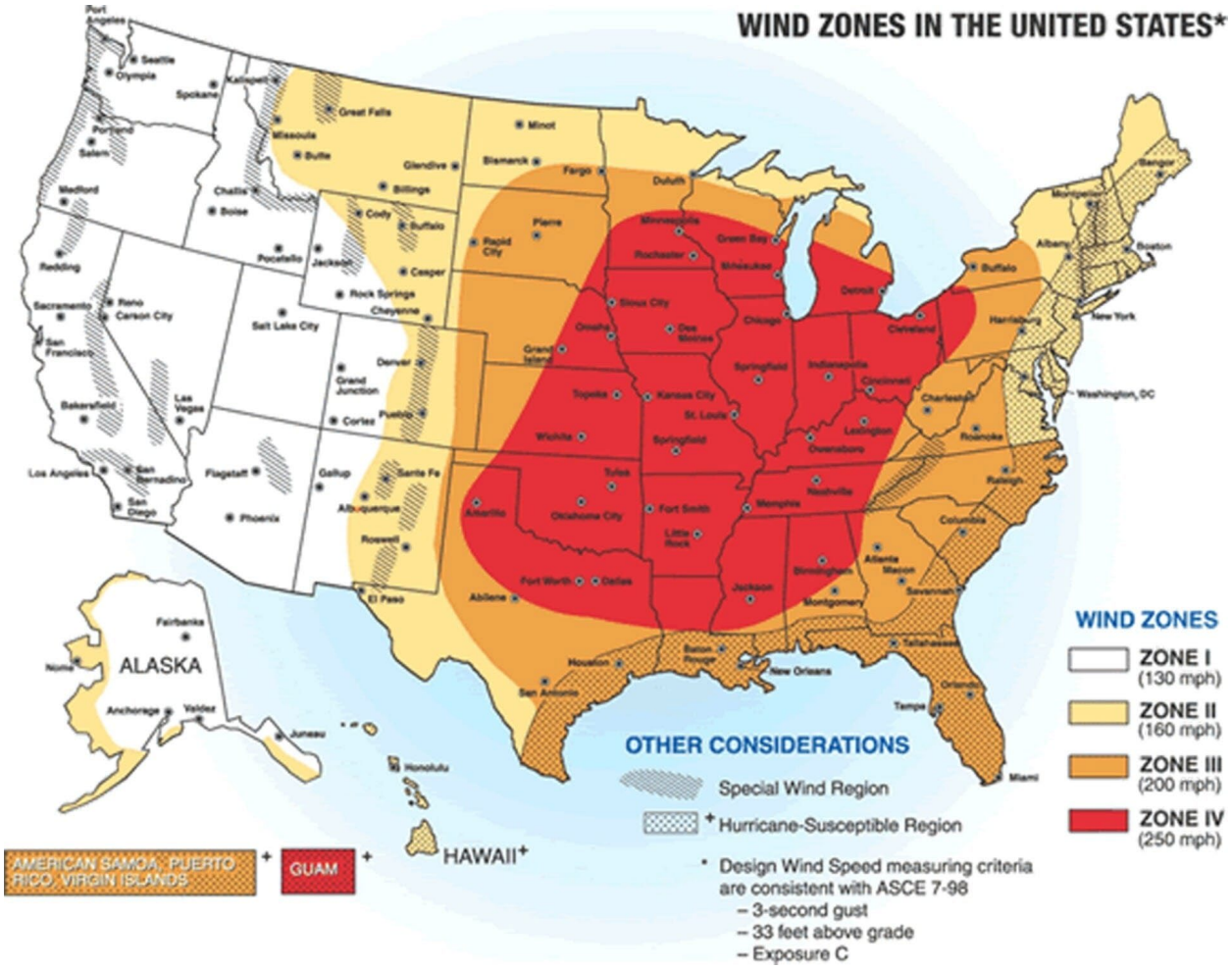
According to NOAA, tornadoes can occur at any location and from a wide variety of conditions. Western South Dakota, though not in Tornado Alley, is still vulnerable to tornadoes of different strengths.

Tornadoes typically occur in South Dakota in May, June, and July, but they can occur in any month. The greatest period of tornado activity (about 82% of occurrence) is from 11:00 a.m. to midnight. Within this time frame, most tornadoes occur between 4:00 p.m. and 6:00 p.m. The State of South Dakota Enhanced Hazard Mitigation Plan cautions future growth in the State as it increases communities' vulnerability of tornadoes. The Plan states, "Future growth in any county may alter the increased future vulnerability to tornado events, as density increases (which increases the potential for catastrophic damages) or as more population becomes exposed." The State of South Dakota Enhanced Hazard Mitigation Plan states that future growth should be carefully monitored in the southeast corner of the state as that is where there is rapid growth, including Union County.

4.2.5.1 High Wind

The entire State is susceptible to high wind events. Most of South Dakota is in U.S. Wind Zone III, which is vulnerable to winds up to 200 mph.

Figure 10: Wind Zones in the United States, FEMA, n.d.



The western-most part of the State is in U.S. Wind Zone II, which is susceptible to winds up to 160 mph. According to the National Risk Index, Union County's risk of strong wind is relatively moderate. According to the NCEI Storm Events Database, there were 8,310 windstorm events (7,153 thunderstorm wind, 1,149 high wind, and eight strong wind events) in South Dakota between 1955 and 2021. There were 11 deaths and 149 injuries in this period. Total property and crop damage for events between 1993 (when damage figures began being kept) and 2021 is estimated at $153,056,500.[25] This suggests that South Dakota averages 126 wind events, $2,319,038 in wind losses, and approximately 2.3 injuries each year. Every county in South Dakota is vulnerable to windstorms, but some counties have a higher risk than others.

[25] South Dakota Enhanced Hazard Mitigation Plan, 2024, https://dps.sd.gov/application/files/3817/1440/7996/sd-enhanced-hazard-mitigation-plan-2024-r.pdf

Vulnerability can vary slightly based on the severity of windstorm events. It is difficult to pick an area of higher vulnerability to windstorms in the State if all windstorm events are examined. Counties where at least 100 events have been recorded are evenly distributed across the State. This is largely due to the counties' high ratings for building exposure and population density. In general, the counties with the greatest vulnerability to windstorm events are those in the Black Hills Region and those with major cities.

4.2.6 Wildfire

Generally, large wildfires make up a small portion of total fire occurrences in any given year but account for the greatest portion of suppression costs. Expenses can also be driven up by atypically large numbers of moderate or small fires that drain resources. State fire suppression costs totaled $54,956,928 between 1994 and 2018. This averages to around $2,289,872 annually and does not include losses to structures, forests, and utilities. It is important to note that the amount of financial support was not known for every event. Within that 24-year period, the highest suppression costs occurred in 2002, 2006, 2007, and 2012; each of these years coincided with a drought. The fire suppression costs for these years were a magnitude greater than those of wet years, such as 2010. In response to the drought year 2006, the South Dakota Legislature passed a law that was enacted to allow the use of the State Fire Suppression Fund to pay for responding to and managing large wildfire activity in the prairie regions of the State. This can drive up fire fund expenditure in future years.[26]

Wildfire conditions across South Dakota and the western United States in general are likely to worsen in the future due to an increase in temperatures, an increase in annual precipitation, and drought as a regular occurrence. The increase in temperatures can dry out fuels more rapidly. The increase in moisture can provide favorable conditions for fuel (vegetation) growth. The trend toward larger precipitation events with drought as a common occurrence provides multiple windows of opportunity for the fuels to dry out and burn, particularly fine fuels like grasses. More intense wildfires can produce highly erodible soils that can lead to increased sediment loading in reservoirs and streams, damaged water infrastructure, and degraded water quality. This can also result in increased flood and debris flow risk in affected watersheds for many years following a destructive fire. Although wildfires in Union County are uncommon, it is possible that increasing temperatures may encourage more wildfires within the region.

[26] Codified Laws, South Dakota Legislative Research Council, 2021, https://sdlegislature.gov/Statutes/41-20A-8

4.2.7 Winter Storm

Severe winter storms are typically associated with unstable weather conditions and are not geographically predictable. All areas within Union County are equally susceptible to the impacts of these events, including hazardous driving conditions, loss of life or injury for individuals without proper shelter, and damage to property. Compared with other hazards discussed in this Plan, severe winter storms are far more likely to result in the loss of life or injuries. Since one of the primary impacts of winter storms is hazardous driving conditions, most of the deaths and injuries resulting from winter storms are a result of traffic accidents on icy, snow-covered roadways or poor driving conditions resulting from blowing snow.

The probability of severe winter storms occurring in any given year is likely. South Dakota's northern location, flat landscape, and proximity to the typical U.S. winter storm track make it highly susceptible to heavy snows, high winds, and low wind chill temperatures.
The State of South Dakota Enhanced Hazard Mitigation Plan also states that the northern U.S. has experienced an increase in the frequency of large snowfall events, where other places in the country have been decreasing. Some analyses have shown an increase in winter storm frequency and intensity, with storm tracks moving northward since 1950. There remains some uncertainty in projections for the coming decades, but the rising trend of extreme precipitation events in general (including winter season) will continue to be a hazard.

4.2.7.1 Freeze & Extreme Cold

Extreme cold often accompanies a winter storm or is left in its wake. It is most likely to occur in the winter months of December, January, and February. Prolonged exposure to the cold can cause frostbite or hypothermia and can become life threatening. Infants and the elderly are most susceptible. Pipes may freeze and burst in homes or buildings that are poorly insulated or without heat. Extreme cold can disrupt or impair communications facilities. Winter storm hazards can occur anywhere in South Dakota, but some clear spatial patterns exist. Cold wave events are far more likely to occur in the relatively low-elevation, northeastern part of the state. Ice storms are much more likely to occur in the southeast part of the state than in the southwest. Winter storms are most common in the Black Hills and the northeast corner of the state. According to NCEI, there were 2,136 winter storms (snow and ice events) recorded in South Dakota between January 1993 and December 2021, and 499 extreme cold events from January 1994 to December 2021. Winter storm events have resulted in 20 deaths, and 127 injuries were attributed to these events. This suggests that South Dakota can expect approximately 1.4 deaths and five injuries each year. Total property damage for these events is estimated at $105 million. This suggests

that South Dakota averages 76 winter storms and $3.7 million in winter storm losses annually, as well as 18 extreme cold events each year. The record event took place on December 25, 2016. The blizzard event resulted in a presidential declaration for 24 counties.

4.2.8 Geological Hazards

Despite gaps in the present state of knowledge, it is apparent that, in general, South Dakota has a much lower risk for geological hazards than most other western states due to the flatter terrain in the central and eastern parts of the State and the overall lack of seismic activity. For most of the geologic hazards profiled, the greatest risk is concentrated in the Black Hills Region and along the Missouri River where geography makes landslides and mudflows more likely. Subsidence and expansive soils tend to occur as gradual and ongoing processes throughout most of the State, although they do not lead to significant or frequent losses or casualties.

4.2.8.1 Earthquake

An earthquake is the vibration of the earth's surface following a release of energy in the earth's crust. This energy can be generated by a sudden dislocation of the crust or by a volcanic eruption. Most destructive quakes are caused by dislocation of the crust. The crust may first bend and then, when the stress exceeds the strength of the rocks, break and snap to a new position. In the process of breaking, vibrations called "seismic waves" are generated. These waves travel outward from the source of the earthquake at varying speeds. Earthquakes east of the Rocky Mountains are less frequent than in the western United States and are typically felt over a much broader region. Most of North America east of the Rocky Mountains has infrequent earthquakes, and the region from the Rockies to the Atlantic Ocean can go years without an earthquake large enough to be felt. Several U.S. states have never reported a damaging earthquake.

The earthquakes that do occur in this region are typically small and occur at irregular intervals. East of the Rockies it is difficult to determine the specific fault that is responsible for an earthquake since this vast region is far from plate boundaries, which are in the Atlantic Ocean, the Caribbean Sea, and in California and offshore from Washington and Oregon. Known faults do exist in this "stable continental region," but numerous smaller or deeply buried faults remain undetected; even most of the known faults are poorly located at depths typically associated with earthquakes. Additionally, it is difficult to determine if a fault is still active and capable of generating an earthquake. Consequently, in most areas east of the Rockies, the best guide to earthquake hazards is the earthquakes themselves.

South Dakota is somewhat more seismically active than other areas in the Northern Great Plains, although the earthquake magnitudes have been relatively minor to date.

4.2.8.2 Landslide

Increasing heat and hazards are also anticipated to impact the frequency of extreme precipitation events in the State of South Dakota. “Since 1990, South Dakota has experienced a 22% increase in occurrences of 2-inch rain events compared to the historical average,” according to NOAA's 2022 State Climate Summaries. Some historic rain and flooding events have also occurred in recent years. Due to increasing hazards, landslides may become more frequent and severe. Increased precipitation may encourage flows that contain the most water of all landslide types.

4.3 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

Hazus-MH version 5.1 inventory data was used as the basis for overall exposure of buildings and lifelines. The Essential Facilities inventory for the State includes schools, police departments, fire departments, and emergency operations centers. Hazus-based total count and value of buildings in these categories include 1,586 buildings and $6.2 billion in exposure. Essential facilities in Hazus include 857 schools representing $3.9 billion in value, 86 hospitals with 3,281 beds representing $697 million, 169 police stations representing $405 million, 387 fire stations representing $929 million, and 87 emergency operations facilities representing $208 million. In Hazus-MH there are utility and infrastructure data sets that are considered "lifeline" inventory. There are seven transportation systems that include highways, railways, light rail, bus, ports, ferry, and airports. There are six utility systems that include potable water, wastewater, natural gas, crude and refined oil, electric power, and communications. The total value of the lifeline inventory is over $196 billion. This inventory includes over 7,417 miles of highways, 5,815 bridges, and 293,608 miles of pipes.

Table 28: Critical Facilities in South Dakota, 2024

FEMA Lifeline	Critical Facility	Count
Energy	Powerplant	56
	Total	**56**
Hazardous Materials	Risk Management Plans Facility	162
	Toxins Release Inventory Facility	259
	EMS Station	262
	Hospital	76
	Total	**759**
Food, Water, Shelter	Wastewater Facility	341
	Water Facility	7
	Total	**348**
Safety & Security	College/University	30
	Courthouse	65
	Fire Station	383
	Local Emergency Operations Center	86
	Local Law Enforcement	169
	Prison	55

	Private School	66
	Public School	649
	State Emergency Operations Center	1
	Weather Radar Station	3
	Total	**1,507**
Transportation	Aviation	183
	Bridge	5,640
	Bridge Scour	248
	Total	**6,071**
Grand Total		**8,741**

Source: State of South Dakota OEM, HIFLD, South Dakota OpenData, WSP GIS analysis

Figure 11: FEMA Lifelines, South Dakota 2022

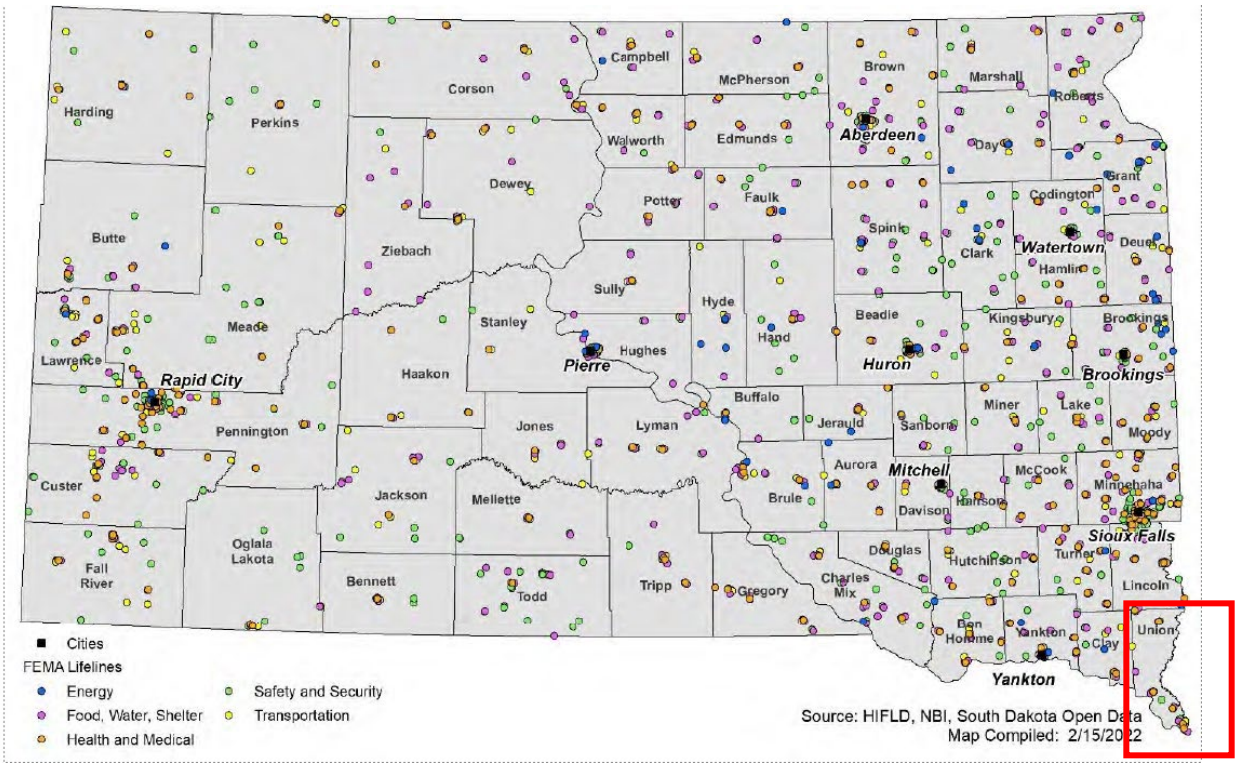


Figure 11 demonstrates the distribution of critical facilities across the state of South Dakota. The red square highlights the MID county and its associated lifelines, which include multiple health and medical facilities; safety and security facilities; and food, water, and shelter lifelines.

4.3.1 Vulnerability by Hazard Type

4.3.1.1 Dam & Levee Failure

Of the State's 2,573 dams, 2,332 (91%) have low hazard potential; 2,044 (88%) of the low hazard dams are privately owned. South Dakota has 86 high hazard dams, almost half of which are federally owned. All high hazard dams are required to have Emergency Action Plans (EAPs); 97% of the State's high hazard dams have EAPs on file. This represents a consistent improvement from 24% in 2007, to 83% in 2012, until reaching 97% in 2023.[27] In addition to these dams, South Dakota also has levees that pose flood risks.

Levees are earth embankments constructed along rivers and coastlines to protect adjacent lands from flooding. Floodwalls are concrete structures, often components of levee systems, designed for urban areas where there is insufficient room for earthen levees. When levees and floodwalls and their related structures are stressed beyond their

[27] South Dakota Enhanced Hazard Mitigation Plan, 2024, https://dps.sd.gov/application/files/3817/1440/7996/sd-enhanced-hazard-mitigation-plan-2024-r.pdf

capabilities to withstand floods, levee failure can result in loss of life and injuries as well as damages to property, the environment, and the economy. In South Dakota, there are numerous levels ranging from small agricultural levees that protect farmland from high-frequency flooding to large urban levees that protect people and property from larger, less frequent flooding events such as the 100-year and 500-year flood levels. While there have been failures of low hazard dams in recent years, no deaths or injuries were reported, and property damage was minimal.

To compound uncertainty regarding future flood conditions, a frequently overlooked aspect of flooding is the idea that heavy rainfall does not automatically translate to more flooding. Other factors exist. Construction and maintenance of stormwater infrastructure or dams profoundly affect flood hazards. Use of green infrastructure such as vegetative swales also reduces flooding, as does increasing tree canopy and enhancing riparian areas. What is certain, however, is that future flood hazards will be different from past flood hazards. Vulnerable critical assets include facilities for at-risk populations, essential services, hazmat facilities, and infrastructure such as transportation, energy, water, communication, healthcare/medical services. Major flooding could have devastating consequences on any of these facilities, including life safety issues, structural damage, access issues, and temporary or permanent disruption of the delivery of services, which in turn can impede the ability of the State or local municipalities to respond to and recover from a major flood event.

A GIS overlay analysis was performed to determine the vulnerability of state facilities to flooding. The latest available National Flood Hazard Layer (NFHL) (1% and 0.2% annual chance flood zones) and Hazus-MH-modeled base flood extents (in areas where NFHL was not available) were used. Areas protected by levee were extracted from NFHL data and also analyzed to provide an overview of state-owned building exposure by county in each flood hazard zone. Flood consequences for the Department of Transportation buildings may compromise the transportation lifeline in certain areas of the state; site-specific studies would need to be conducted to assess actual risk and need for mitigation. A deficiency exists in state asset databases: The State does not currently have consistent data on the location, type, and replacement values of most state assets.

4.3.1.2 Drought/Extreme Heat & Wildfire

Wildfire impacts on critical facilities can include structural damage or destruction; risk to people located within facilities; disruption of transportation, shipping, and evacuation operations, and interruption of facility operations and critical functions. With 101 total buildings being subject to wildfire hazards, fire suppression may also require increased cost to local and state government for water acquisition and delivery, especially during periods of drought when water resources are scarce.

4.3.1.3 Winter Storm & Extreme Cold

While all counties in South Dakota are vulnerable to winter storms, the more developed areas, represented by greater building values and higher population densities, will generally have greater costs for snow removal and functional downtime because of loss of utility services. The counties with greater developed areas may have the capacity to absorb those costs more than the rural areas. Property vulnerabilities to severe winter weather include damage caused by high winds, ice, or snowpack and subsequently melting snow. Vehicles may be damaged by the same factors or be temporarily unusable due to the driving conditions created by severe winter weather. Contents of homes, storage units, warehouses, and storefronts may be damaged if the structures are compromised or fail due to the weather or during potential flooding caused by melting snow. Very wet snowpack is heavy and may create strains on structures, causing partial or entire collapses of walls, roofs, or windows, and may cause tree limbs to damage buildings and overhead utilities. This is a factor in both architecture and construction material and should be assessed on a building-by-building basis. These records are probably tracked via insurance or other private vendors.

Agricultural operations, including crops and livestock, are also highly vulnerable to severe winter storms. To estimate potential losses caused by winter storms, historic loss data was analyzed. The NCEI data did not lend itself to county-by-county loss summaries, only a statewide summary, due to data tracking by forecast zones. The Risk Management Agency of the U.S. Department of Agriculture identifies several causes of loss related to extreme cold and winter weather, including cold winter, freeze, and frost. South Dakota received $152,447,135 in indemnities and lost 1,596,749 acres from freeze, frost, and cold winter-related events between 2007 and 2021. This averages out to $10,889,081 in winter weather-related indemnities each year.[28]

4.4 Conclusion

As this Mitigation Needs Assessment makes clear, there are at least seven natural hazards that pose a considerable risk to the State of South Dakota. By characterizing these hazards in terms of their frequency and the State of South Dakota's vulnerability, GOED 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 hazards over the long term.

Effective infrastructure is essential for South Dakota's disaster resilience because it helps manage floodwaters, protects communities from natural hazards, and supports long-term

[28] South Dakota Enhanced Hazard Mitigation Plan, 2024, https://dps.sd.gov/application/files/3817/1440/7996/sd-enhanced-hazard-mitigation-plan-2024-r.pdf

recovery efforts. The 2024 disaster events underscored the importance of flood control measures like drainage systems. By investing in robust infrastructure, South Dakota can mitigate risks, safeguard residents, and ensure communities remain resilient in the face of future disasters. Additionally, these investments enable quicker recovery and rebuilding, minimizing the long-term impacts on affected areas.

In the long term, South Dakota officials have recognized the critical need to reevaluate and enhance their flood mitigation strategies to better protect communities. This initiative includes updating local mitigation plans to address evolving environmental challenges and improve resilience. The current approach involves utilizing levees to manage floodwaters and safeguard vulnerable areas, but officials are seeking more comprehensive and effective solutions to ensure long-term safety and sustainability.[29]

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. GOED will prioritize infrastructure recovery and resilience with the CDBG-DR funds with 100% of the mitigation set-aside amount going toward infrastructure mitigation activities that will increase resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by funding infrastructure that lessens the impact of future disasters.

[29] South Dakota Searchlight, 2025, After McCook Lake disaster, local officials ask Corps of Engineers to help with new flood plan • South Dakota Searchlight

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

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

5.1 CDBG-DR Program Allocation and Funding Thresholds

Table 29: 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 HUD MID Areas	Estimated % to LMI
Administration	$768,750	5%	N/A	N/A	N/A
Planning	$2,306,250	15%	N/A	N/A	N/A
Infrastructure	$12,300,000	80%	100%	100%	70%
Total	**$15,375,000**	**100%**	**100%**	**100%**	**100%**

GOED has structured its CDBG-DR funding strategy to directly address the most significant and impactful unmet and mitigation needs arising from the 2024 disaster events. GOED has made a strategic decision to allocate its limited CDBG-DR funding toward infrastructure and mitigation planning activities. Because the State received less than $20 million in CDBG-DR funding, it is not required to allocate funds proportionally across need categories. GOED has nonetheless taken a data-informed and community-centered approach to target funds in a manner that ensures the greatest possible benefit to disaster-impacted residents. This approach emphasizes the delivery of long-term, resilient infrastructure investment while empowering local jurisdictions to address housing needs through other recovery funding streams.

The decision to prioritize infrastructure is directly tied to the results of the unmet needs and mitigation needs assessments, which demonstrated damage to critical public infrastructure systems, including roads, water and sewer systems, and drainage systems in residential and low- to moderate-income areas. Infrastructure unmet need represented 94% of the total unmet need and is therefore prioritized. Infrastructure failure during and after the disaster created disruptions to communities, economic activity, and long-term community viability. These challenges were especially acute in the MID-designated ZIP codes, where residents were left without critical services such as gas and power.

Investing CDBG-DR funds in infrastructure projects enables GOED to directly improve the quality of life for a broad segment of residents, support housing recovery indirectly by making neighborhoods habitable and resilient and enhance the long-term stability of impacted communities. The infrastructure investments funded through this Action Plan will

serve as a foundation upon which local jurisdictions can rebuild housing and restore economic activity.

The inclusion of funding for local planning activities addresses a key gap identified through the stakeholder consultation process, namely the need for updated local disaster response plans, many of which are outdated or insufficient. Planning projects will help ensure communities are better equipped to respond to future hazard events and avoid the scale of damage and disruption suffered in 2024.

This allocation framework is justified by the dual goals of maximizing the number of beneficiaries and reducing the administrative burden associated with implementing a complex federal housing recovery program. While the State's unmet needs assessment identified remaining unmet needs for housing in the MID areas, local governments will be able to focus their limited local and state recovery resources on housing development and repair programs that are tailored to their specific needs and funding sources.

5.1.1 Hazard Mitigation Measures

All infrastructure projects funded through GOED's CDBG-DR allocation will incorporate hazard mitigation measures to reduce future risk. These measures will be guided by the findings of the State's mitigation needs assessment and will consider the full range of hazard risks relevant to each community, including flooding, high winds, and severe winter storms. GOED will ensure that funded projects are compliant with resilient design standards and utilize best practices in risk reduction and climate adaptation. Mitigation planning projects, in turn, will provide communities with the tools and data needed to identify, prioritize, and implement high-impact mitigation projects in the future.

5.1.2 Minimizing Displacement

GOED is committed to minimizing the displacement of persons and entities resulting from CDBG-DR-funded projects. Infrastructure and planning activities inherently carry a low risk of residential displacement; however, GOED will require subrecipients to take all reasonable steps to avoid or minimize displacement and, where displacement is unavoidable, to provide appropriate relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and Section 104(d) of the Housing and Community Development Act. This consideration will include accessibility needs of displaced persons with disabilities.

GOED will also ensure that infrastructure improvements are designed to meet the accessibility needs of individuals with disabilities, consistent with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and other applicable civil rights laws. Planning efforts will include a focus on equitable engagement and input from people with disabilities, seniors, and other populations with unique access needs.

VI. Allocation, Award Caps, and Program Description

6. Allocation, Award Caps, and Program Description

6.1 General Exception Criteria

Maximum awards amounts, where applicable, are identified by program in the sections below. At the time of submission, maximum award amounts were established for all required programs and GOED does not anticipate changes. However, GOED may provide exceptions to award maximums on a case-by-case basis and will include procedures within program guidelines on how GOED or its subrecipients will analyze the circumstances under which an exception is needed and the amount of assistance as necessary and reasonable.

6.2 Administration

Table 30: Grantee Administration Activity Overview

Program	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	$768,750	5%

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.

6.3 Planning

Table 31: Grantee Planning Activity Overview

Program	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Planning Total:	$2,306,250	15%

6.3.1 Local Planning Program

GOED's Local Planning Program will support disaster-impacted MID areas to better prepare for future disasters. Funding for the Local Planning Program will be directly allocated and managed through subrecipients. This program will provide critical planning funding to support MID area communities that are recovering from a disaster to update local disaster response plans, helping them to lay the groundwork for long-term resilience and prioritizing actions that reduce future vulnerabilities. By strengthening disaster and mitigation planning at the local level, the program empowers these communities to make informed decisions, improve preparedness, and better withstand future disasters.

6.3.2 Unmet Needs and Mitigation Analysis Support

GOED will utilize planning funds for eligible activities associated with the development of the unmet needs and mitigation needs analyses for the Action Plan.

6.4 Infrastructure Overview

GOED will have one general infrastructure program. The program will be available for communities in the HUD MID areas to support recovery from direct impacts and mitigate against future impacts from disasters.

Table 32: Grantee Infrastructure Program Overview

Program	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Local Infrastructure Recovery and Resiliency Program	$12,300,000	70%

6.4.1 Program Name

Local Infrastructure Recovery and Resiliency Program

6.4.2 Eligible Activities

Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements; HCDA Section 105(a) 1, 2, 4, 9, 14, and 17; applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754).

6.4.3 National Objective

- Low to moderate income benefit
- Urgent Need — 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-identified MID ZIP codes.

6.4.4 Lead Agency and Distribution Model

GOED will serve as the lead agency for the allocation of funds to local subrecipients.

Eligible subrecipients will be units of general local government and school districts.

Note on Responsible Entity: Projects funded through HUD and administered by the State of South Dakota must comply with environmental review requirements under 24 CFR Part 58.

The subrecipient will serve as the Responsible Entity (RE), as defined in 24 CFR 58.4. As the RE, the subrecipient assumes the authority for decision-making and completion of the environmental review.

Per 24 CFR 58.4(b)(2), GOED exercises HUD's responsibilities in accordance with 24 CFR 58.18, including review and approval of a unit of local government's environmental certification and Request for Release of Funds (RROF).

6.4.5 Program Description

The Local Infrastructure Recovery and Resiliency Program will fund critical infrastructure and public facilities projects that benefit the public in the disaster-affected areas. The projects will restore disaster-damaged infrastructure or public facilities and strengthen long-term community resiliency through mitigation-focused improvements. As identified in the Unmet Needs Analysis, there is remaining infrastructure need in the MID areas of Union County. This program will directly address those remaining needs and fund infrastructure projects with a direct or indirect tieback to the 2024 disaster events.

Eligible infrastructure activities include, but are not limited to, acquisition, planning, engineering, and construction. Infrastructure projects may range from road and bridge repairs, stormwater system upgrades, and repairs to water and wastewater systems—including lift stations—to the hardening of critical public facilities, utility infrastructure, and other vital systems that support community function and safety. Eligible public facilities can include those facilities used to provide services to the community, such as parks and community centers. All projects must also incorporate mitigation or resiliency components in their design to reduce future risk and ensure communities are better prepared for future disasters.

GOED is committed to supporting the long-term recovery of residents in the MID areas. Projects under this program must support activities that benefit MID area residents and can also include infrastructure that will contribute to the recovery and future resiliency of housing in the MID area and/or the community as a whole. Subrecipients will apply for funding for projects that serve residential areas, and funding will prioritize neighborhoods with vulnerable populations, including low- to moderate-income households.

Once the Action Plan is approved, GOED will develop a detailed policy on the implementation and administration of the program. Eligible subrecipients in the identified eligible areas will apply to GOED for funding for projects that they have identified will meet the needs most critical to their communities. They will also manage the implementation of selected projects. GOED will work closely with subrecipients to ensure selected projects meet CDBG-DR eligibility requirements and align with HUD regulations and program objectives. GOED anticipates funding between two and five infrastructure and/or public facility recovery projects through this program.

6.4.6 Eligible Geographic Areas

Eligible activities will be restricted to projects located within the HUD-designated MID ZIP codes (57038, 57049) within Union County.

6.4.7 Other Eligibility Criteria

GOED has selected funding criteria to best address the disaster-related unmet needs identified in each affected community and ensure timely project completion. Once the notification of funding availability has been published, GOED will accept applications from eligible subrecipients as part of a competitive application cycle.

Minimum threshold criteria will be established to ensure only eligible, high-quality projects are selected. The criteria used to evaluate each application and award funds will include, but is not limited to:

- The project will be located in one of the HUD-identified MID ZIP codes
- The project has a direct/indirect tie-back to the disaster or is a mitigation project
- The project is an eligible infrastructure/public facilities activity
- There is clear evidence that there are mechanisms in place to ensure long-term maintenance of the project
- The other sources of funding are well documented (if applicable)
- The budget is comprehensive and reasonable for the project scope
- The designs and plans demonstrate that future hazards will be mitigated
- The subrecipient demonstrates the capacity to manage the grant funding

Due to limited available funding, GOED will prioritize projects that benefit the most people in the MID areas to ensure the greatest possible impact in the communities hardest hit by the disaster.

6.4.8 Maximum Amount of Assistance Per Beneficiary

The maximum award for each project is $6 million.

6.4.9 Maximum Income Beneficiary

This is not a direct benefit program and therefore there is no maximum income set for beneficiaries.

6.4.10 Mitigation Measures

All funded infrastructure projects 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. GOED will use its mitigation set-aside funds to support resiliency activities within the infrastructure program.

Projects that are funded using the Mitigation Set-Aside allocation will address a mitigation need identified in the mitigation needs assessment for the MID areas.

6.4.11 Reducing Impediments for Assistance

GOED will offer technical assistance to subrecipients to assist with application development and will provide funding to support grant administration and activity delivery. Additionally, GOED may coordinate with other public entities to provide assistance to communities interested in applying but who need additional guidance on designing eligible projects.

VII. General Information

7. General Information

7.1 Citizen Participation

GOED utilized its CDBG-DR Citizens Participation Plan to guide its citizen participation requirements around the Action Plan. Affected residents were notified of opportunities to participate in the creation of this plan in multiple ways and public and stakeholder participation was facilitated through in-person and virtual meetings, consultations, and a public comment period.

7.2 Consultation of Developing the Action Plan

GOED 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 event.

Stakeholder Meetings: GOED conducted five meetings on May 21 and 22, 2025, in person at the City Hall in North Sioux City, each with a different interest group, including North Sioux City Council, county commissioners and mayors, school superintendent and school board, businesses and chambers, as well as homeowners in the disaster-affected area. The meetings included a brief presentation of the CDBG-DR grant requirements and Action Planning process followed by an opportunity for participants to discuss ongoing unmet needs.

GOED facilitated active discussions on the proposed use of grant funding and solicited feedback on the ongoing needs and priorities of the impacted areas. To be responsive to the feedback received during these meetings, GOED made updates to the proposed infrastructure program design to better meet community needs. The updates include the addition of school districts as an eligible subrecipient of funding and additional language to reinforce the prioritization of programs that will benefit impacted residential areas. The language was also clarified to make it clear that the repair of or improvements to public facilities is an eligible activity under the infrastructure program.

Business Online Survey: In coordination with the North Sioux City Economic Development Agency, GOED conducted an online survey that was advertised to businesses in the disaster-affected area. The survey asked questions to assess the damage business owners and suppliers experienced, the challenges of receiving assistance after the storm, and their current needs. The online survey was emailed to businesses in the affected areas by the local Economic Development Agency.

Ten total businesses submitted responses to the survey. Half of these businesses responded that they were not impacted by the 2024 disaster. Those businesses that were impacted experienced temporary closures or delays in receiving supplies due to the

infrastructure impacts (roads and bridges) in the area. None of the businesses that responded had any remaining unmet need from the disaster.

Businesses were asked to provide feedback on what should be prioritized for overall recovery in the area and a majority of the feedback focused on the need for solutions that would help the community avoid and/or strengthen against similar disaster impacts in the future.

In addition to the outreach efforts detailed above, GOED also consulted with the following groups and organizations:

Table 33: Consultation

Partners Consulted	Describe Consultation
Federal Partners	• South Dakota Regional SBA Office: GOED reached out via email on 4/24/25 to discuss remaining needs; ongoing coordination on data sharing. • FEMA: South Dakota Office of Emergency Management held multiple meetings with various FEMA partners from August 2024 to March 2025 to discuss long-term recovery efforts in Union County. These discussions covered potential residential acquisition projects and infrastructure-related needs. During these meetings, Union County residents' long-term recovery priorities were identified and addressed. • FEMA Region 8 VOAD Coordinator: The SD Voluntary Agency Liaison met weekly and biweekly with the FEMA Region 8 VOAD Coordinator to discuss needs assessments, donations management, and various other long-term recovery topics for Union County.
Local/State Government	• North Sioux City Economic Development: Meetings occurred on 12/2/24, 1/9/25, and 4/10/25. Met with Economic Development Director and identified multiple infrastructure needs (reconstruction of North Shore Drive and levee construction). • North Sioux City: Meeting occurred on 4/22/25. Met with City Administrator Jeff Dooley to discuss community housing needs. • Representative Dusty Johnson: Contacted Rep. Johnson's office on 4/11/25. Ongoing discussions with Reid Rassmusen regarding local needs the office is aware of. • South Eastern Council of Local Governments: GOED reached out on 4/23/2025 via email regarding the administration of CDBG-DR funds.
Indian Tribes	• N/A – there are no federal or state recognized Indian tribes in the MID areas.

Nongovernmental Organizations	• Union County Long Term Recovery Group: Email sent on 4/24/25 by GOED requesting information on current recovery needs related to the CDBG-DR grant. • Union County Long Term Recovery Group: From July to May 2025, the SD Voluntary Agency Liaison (VAL) met weekly and biweekly with local North Sioux City recovery groups to discuss needs assessments, donations management, and various other long-term recovery topics. • Union County Long Term Recovery Group: On July 21, 2024, representatives from SD Department of Public Safety, SD Office of Emergency Management, Lutheran Social Services, Lutheran Disaster Response, SD VOAD, World Recovery, United Policyholders, St. Vincent de Paul, Good 360, Knights of Columbus, Feeding South Dakota, and the Red Cross met to discuss transitioning from immediate disaster response to long-term recovery. The group shared updates on their current efforts and identified ongoing community needs, including housing support, food security, and case management. They explored collaboration opportunities, such as coordinated distribution of essential goods and joint outreach initiatives, to enhance recovery efforts and support affected individuals and families.
Private Sector	• GOED conducted business retention and expansion visits with 13 businesses (Murphy Company, SGS - North Sioux City, Innovive [Wytec], Hearthside Food Solutions, Big Frig, Sterling Computers, Royal Canin, Nutraferma, Red's All Natural LLC, Crown Bakeries, Prince Manufacturing, FIMCO Industries, and NextBeam) in November and December 2024 to discuss the impact of the disaster on the local economy. The major issues identified related to the retention of workforce, housing availability, and utilities capabilities.
State and Local Emergency Management Agencies That Have Primary Responsibility for Administering FEMA Funds	• South Dakota Office of Emergency Management: Met on 11/27/24 to conduct discussions to better understand the impact of the flood, mitigation, and other FEMA updates. OEM participates in weekly check-in meetings on the CDBG-DR grant with GOED, sharing information on unmet need and other FEMA-funded projects and priorities. • Union County Emergency Management: From June 2024 to September 2024, Union County Emergency Management, in coordination with OEM and FEMA, actively collaborated on data collection efforts through various meetings to support long-term recovery initiatives. These efforts focused on gathering accurate and comprehensive information to assess community needs, track progress, and inform decision-making related to local recovery goals. Through these coordinated efforts, the agencies

	aimed to ensure a unified and efficient approach to data management and recovery planning. • The Union County Emergency Manager and the SD OEM Voluntary Agency Liaison (VAL) have been coordinating regular meetings — initially held weekly, then biweekly, and now moving to a monthly schedule — to address the needs of the Union County Long-Term Recovery Group. These meetings focus on planning for future challenges, identifying and securing resources, and maintaining open communication about ongoing and unmet needs to support recovery efforts.
Public Housing Agencies	• South Dakota Housing Authority: Meeting occurred on 4/15/25. Met with Executive Director of South Dakota Housing Chas Olson to discuss potential housing needs. *Note: SD Housing is the state agency that manages the CoC and PHAs and is the state's housing finance agency.*
Agencies That Manage Local Continuum of Care	• See above under Public Housing Agencies. SD Housing manages the CoC. GOED specifically reached out to SD Housing for the Homeless Consortium on 4/24/2025, alerting it to the CDBG-DR process and inviting feedback.
HUD-Approved Housing Counseling Agencies	• GOED reached out to CCCS of LSS South Dakota, the HUD-approved housing counseling agency in Union County, on 5/8/2025 alerting it to the CDBG-DR process and inviting feedback.
State Housing Finance Agencies	• See above under Public Housing Agencies. SD Housing acts as the state's housing finance agency.

It should be noted that much of the early coordination post-disaster and with FEMA was managed by South Dakota Office of Emergency Management (SD OEM). A representative from SD OEM has participated in weekly CDBG-DR check-in meetings with GOED to ensure the feedback and information collected during this period was taken into consideration during the development of this Action Plan.

7.3 Public Comment

GOED published this Action Plan on its website (https://sdgoed.com/partners/financing-incentives/community-development-block-grants-dr/) for a 30-day public comment period. The public comment period will run from June 11, 2025 at 8:00 am CDT until July 11, 2025 at 4:30 pm CDT.

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

A summary of citizen comments on this Action Plan, along with GOED responses, will be included in the final Action Plan and will be public posted following HUD approval.

Comments regarding the CDBG-DR Action Plan are accepted via email to GOED.CBDGDRInfo@state.sd.us, or mail to the South Dakota Governor's Office of Economic Development, 711 East Wells Ave, Pierre, SD 57501.

7.4 Public Hearings

Due to the allocation amount of under $20 million, GOED is not required to host a public hearing on the Action Plan. Public comment is welcome and will be accepted during the public comment period.

7.5 Citizen Complaints

GOED or its subrecipients will provide a written response to each formal complaint within 15 working days of receipt. Formal complaints are written statements of grievance submitted via hand delivery, email, and posted letters to GOED.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Citizens can also make fair housing complaints directly to HUD at 1-800-669-9777 or through the online portal, which can be found on the HUD website: https://www.hud.gov/fairhousing/fileacomplaint.

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).

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

7.6 Amendments

Over time, recovery needs will change. GOED 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.

7.6.1 Substantial Amendments

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 $1 million or greater of a program budget
- A proposed change to an adopted method of distribution

When GOED pursues the substantial amendment process, the amendment will be posted on the GOED disaster recovery webpage for a 30-day public comment period.

7.6.2 Non-Substantial Amendments

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. GOED will notify HUD five business days before the change is effective. All amendments will be numbered sequentially and posted to the GOED disaster recovery webpage into one final, consolidated plan.

7.7 Performance Reports

Performance reports will be completed on a quarterly basis using the HUD Disaster Recovery Grant Reporting (DRGR) System. Data will be gathered for performance reports from subrecipients as well as internally at GOED. The data will be compiled and entered per activity into DRGR. Financial and progress-based data will be collected. Quarterly reports will be posted publicly on the GOED CDBG-DR website.

VIII. Appendix

8. Appendices

8.1 Certifications

a. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan
GOED certifies that it:

(1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;

(2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

b. Authority of Grantee: GOED certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

c. Consistency with the Action Plan: GOED certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

d. Citizen Participation: GOED 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: GOED grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

f. Use of Funds: GOED 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- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

(a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or

(b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

g. Grant Timeliness: GOED 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 of the Universal Notice and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

Additionally, as required by HUD's March 19, 2025, memorandum revising Appendix B of HUD's Universal Notice, GOED will comply with the following certifications: General Certifications at 24 CFR 91.325(a)(1), (3), and (7); and Community Development Block Grant Program Certifications at 24 CFR 91.325(b)(5), (6), and (7).