

Baldwin County Local Recovery Plan

For DR-4563

Draft for Public Comment

July 2024



Prepared for:
Baldwin County



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1 Executive Summary

1.1 Overview

The State of Alabama was awarded Community Development Block Grant – Disaster Recovery (CDBG-DR) funding from the U.S. Department of Housing and Urban Development (HUD) to support in the state’s recovery from the 2020 Hurricanes, Sally and Zeta. As part of the state’s damage and needs assessment, Baldwin County was identified as a most impacted and distressed area and was awarded \$43,361,686 through the Alabama Department of Economic and Community Affairs (ADECA) CDBG-DR Action Plan. These funds are intended to address remaining recovery needs from the disasters by filling funding gaps or providing means to mitigate future impacts.

To access these recovery funds, Baldwin County must prepare and submit a Local Recovery Plan to ADECA. The Local Recovery Plan provides an assessment of remaining recovery needs within the county and proposes programs that invest the CDBG-DR funds into the community to meet the assessed disaster recovery needs.

1.2 Disaster Overview

Baldwin County experienced two Category 2 hurricanes in 2020 that caused substantial damage to property and individuals and resulted in Presidentially declared disasters for the state of Alabama.

1.2.1 HURRICANE SALLY (DR-4563)

Hurricane Sally made landfall on September 16, 2020, near Gulf Shores, Alabama as a Category 2 hurricane. The storm produced over 30 inches of rain over southern Alabama and the Florida Panhandle, and maximum sustained wind speeds of 105mph. High winds toppled trees, downed power lines, and damaged roofs, resulting in widespread power outages and structural damage. The storm surge and heavy rainfall associated with Hurricane Sally led to widespread flooding across Baldwin County. Coastal communities such as Gulf Shores and Orange Beach experienced significant inundation, with floodwaters damaging homes, roads, and businesses. Many areas experienced road closures and impassable streets due to flooding, debris, and washouts.

1.2.2 HURRICANE ZETA (DR-4573)

Hurricane Zeta crossed southern Alabama on October 28 and 29, 2020, after making landfall in Louisiana. Hurricane Zeta was a Category 2 storm with maximum sustained winds of 110mph and brought rainfall of 2-5 inches. The storm cut across the northern half of Baldwin County, causing widespread power outages and tree damage and flooding in agricultural areas.

1.3 Summary

ADECA’s 2022 CDBG-DR Action Plan was approved by HUD on January 12, 2023, with a substantial amendment approved on July 21, 2023. The Action Plan and amendment provided notice to Baldwin County of the award of \$43,361,686 along with establishing the Local

Recovery Planning Program (LRPP).¹ Baldwin County entered into a subrecipient agreement with ADECA on October 17, 2023, to develop the Local Recovery Plan comprising an assessment of unmet recovery needs within the county and identifying programs and strategies for recovery. This plan must meet ADECA's LRPP guidelines, as well as requirements for CDBG-DR funds set by HUD.

Recovery programs in this plan and subsequent activities must:

- Be an eligible activity for CDBG and ADECA's LRPP,
- Meet a National Objective,
- Have a clear "tie-back" or relation to Hurricanes Sally or Zeta, and
- Address direct or indirect disaster-related impacts.

In addition to the ADECA program guidelines for the Local Recovery Plan at a state level, these CDBG-DR funds are also guided by federal requirements posted in the February 3, 2022 ([87 FR 6364](#)) and May 24, 2022 ([87 FR 31636](#)) Federal Register notices for Public Law 117-43, which addressed 2020 disasters.

Baldwin County prepared the Local Recovery Plan to describe how the CDBG-DR funds will address the remaining recovery needs and be compliant with federal, state and local regulations. The programs outlined in this plan were designed according to the needs of the community, the County's capacity to implement, and the timeline of ADECA's award.

To determine the remaining recovery needs, the County analyzed data from a number of federal, state, and local sources that showed impacts from the storms, such as the numbers of individuals who applied for assistance from the Federal Emergency Management Agency (FEMA) and businesses that applied for assistance from the Small Business Administration (SBA). This data provided Baldwin County with an understanding of the remaining unmet need in housing, infrastructure, and economic revitalization. The County also conducted outreach and collaborated with a variety of stakeholders and community leaders to understand the immediate impacts of the storms, how local communities addressed those impacts, and what challenges remain.

Baldwin County has a total unmet recovery need of \$543,070,542 from Hurricanes Sally and Zeta. The proposed programs and methods of distribution described in this Local Recovery Plan are intended to address the remaining recovery needs in housing, infrastructure, and economic revitalization by using the funds available to achieve the greatest outcomes.

These programs will be administered by the County, and allocations will be made available to address as much of the unmet recovery need as possible. Programs will prioritize the areas and vulnerable populations most impacted by the hurricanes, with the goal of making Baldwin County more resilient to the impacts of future disasters.

¹ ADECA. CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>.

1.4 Unmet Needs and Proposed Allocation

For CDBG-DR, unmet needs refer to the gap between the resources required for the impacted community to achieve recovery and the resources currently available to address the identified needs. This analysis includes data from a broad range of sectors affected by the hurricanes, including housing, infrastructure, and economic revitalization.

ADECA’s unmet needs assessment in its 2022 CDBG-DR Action Plan reviewed data for Baldwin County from the 2020 storms, impacted populations, and remaining unmet need. The state allocated \$43,361,686 to Baldwin based on housing and non-housing (infrastructure and economic revitalization) recovery needs (Table 1).

Table 1: ADECA Action Plan Formula Allocation

Program	Allocation	% of Total
Housing	\$19,219,010	45%
Non-Housing	\$24,142,626	55%
Total	\$43,361,686	100%

Baldwin County reviewed the state’s unmet needs assessment and completed its own analysis to provide an up-to-date assessment of remaining recovery gaps. Additionally, Baldwin County conducted a review of risk from natural disasters that may affect residents, properties, and services within the county and assessed mitigation efforts that may address these risks to limit impacts in future disaster events. By conducting these analyses, Baldwin County was able to identify and prioritize the greatest needs for recovery and determine how CDBG-DR funds may be used to maximize impact and improve outcomes. The \$43,361,686 awarded to the County has been allocated across programming categories based on the County’s review of pre- and post-storm conditions, unmet needs data sources, and engagement with stakeholders on current community recovery needs.

Table 2: Unmet Needs and Budget Allocation by Sector, Baldwin County

Sector	Unmet Needs per Sector	% of Unmet Needs	Budget Allocation per Sector	% of Total Budget
Housing	\$194,785,457	31.7%	\$19,219,010	45%
Infrastructure	\$120,900,184	19.1%	\$24,142,626	55%
Economic Revitalization	\$299,419,738	48.7%	\$0	0%
Total	\$615,105,379		\$43,361,686	

Source: FEMA IA (2024); FEMA PA (2024); SBA (2024)

The County will address the remaining unmet need in housing and infrastructure through programs that meet the greatest needs in these sectors and strengthen the County's ability to recover from future disaster events. CDBG-DR funds will be used to increase homeownership opportunities among vulnerable populations, repair or improve infrastructure, and support mitigation actions to limit future impacts. While there is a remaining need in economic revitalization, the County has determined other funding and supports for workforce training and employment that are currently underway may address community needs. Baldwin County will continue to seek local input through outreach and engagement as it implements programs to ensure that CDBG-DR funds reach the areas and populations most impacted by Hurricane Sally and Hurricane Zeta.

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2 Unmet Needs Assessment

2.1 Overview

The Department of Housing and Urban Development uses unmet needs to refer to the gap between the resources required for communities impacted by disaster to achieve recovery and access the resources currently available to support that recovery. This encompasses a wide range of sectors affected by the disaster, including housing, infrastructure, and economic revitalization. The objective of the Unmet Needs Assessment in the Local Recovery Plan is to quantify these gaps and understand the specific challenges faced by different segments of the community. Assessing the unmet need involves a comprehensive analysis of the damage caused by the disaster, the existing resources allocated for recovery, and the gaps between damage and available resources.

The primary intention of the unmet needs assessment is to provide a detailed and data-driven understanding of a community's disaster impacts, resources it has to support recovery, and the remaining needs that can be addressed with CDBG-DR funding. By identifying and prioritizing the areas with the greatest need, the unmet need assessment ensures that CDBG-DR funds are used in a manner that maximizes positive impact.

2.1.1 DISASTER DAMAGES AND IMPACTS

Hurricane Sally struck Baldwin County, Alabama, on September 16, 2020, as a Category 2 hurricane causing significant damage and disruption to the area. High winds toppled trees, downed power lines, and damaged roofs, resulting in widespread power outages and structural damage. The storm surge and heavy rainfall associated with Hurricane Sally led to widespread flooding along the coast and in low-lying areas of Baldwin County. Coastal communities such as Gulf Shores and Orange Beach experienced significant inundation, with floodwaters damaging homes, roads, and businesses. Many areas experienced road closures and impassable streets due to flooding, debris, and washouts.

Just over one month later, between October 28 and 29, 2020, Hurricane Zeta passed through Baldwin County after making landfall in Louisiana. Hurricane Zeta was also a Category 2 storm and caused damage in the northern half of Baldwin County. Wind and rain from Hurricane Zeta led to widespread power outages, tree damage, and flooding in agricultural areas.

Additionally, the tourism industry, which is a primary economic driver in Baldwin County, suffered significant losses due to the storm. Damage to hotels, restaurants, and attractions affected businesses already struggling due to the COVID-19 pandemic.

Table 3 provides an overview of the unmet needs for housing, infrastructure, and economic impacts, as well as Baldwin County's proposed budget for CDBG-DR funding.

Table 3: Unmet Needs and Budget Allocation by Sector, Baldwin County

Sector	Unmet Needs per Sector	% of Unmet Needs	Budget Allocation per Sector	% of Total Budget
Housing	\$194,785,457	31.7%	\$19,219,010	45%
Infrastructure	\$120,900,184	19.1%	\$24,142,626	55%
Economic Revitalization	\$299,419,738	48.7%	\$0	0%
Total	\$615,105,379		\$43,361,686	

Source: FEMA IA (2024); FEMA PA (2024); SBA (2024)

Table 4 provides estimated losses in the areas of housing, infrastructure, and the local economy. It also estimates that 15 percent of the total amount of initial estimated loss will be required for sectors impacted by disaster to not only rebuild and recover, but also to integrate resilience measures to help those sectors withstand future disasters.

Table 4: Estimated Impact, Support and Unmet Needs, Baldwin County

Sector	Housing	Infrastructure	Economy	Total
Amount of Initial Estimated Loss	\$186,715,223	\$254,784,864	\$335,005,131	\$776,505,218
15% Resilience Costs	\$28,007,283	\$38,217,730	\$50,250,770	\$116,475,783
Total Estimated Impact (Initial Impact + 15% Resilience)	\$214,722,507	\$293,002,594	\$385,255,901	\$892,981,001
Amount of Funds Available from Other Sources	\$19,937,050	\$172,102,409	\$85,836,163	\$277,875,622
Remaining Unmet Needs	\$194,785,457	\$120,900,185	\$299,419,738	\$615,105,379
Percent of Total Unmet Needs	31.7%	19.7%	48.7%	

After Hurricane Sally, there were 21,127 FEMA Individual Assistance (FEMA IA) applicants for owner-occupied units (Table 5). The average FEMA Real Property Verified Loss was \$6,578 (Table 5).

Table 5: FEMA IA Verified Loss for Owner-Occupied Units, Baldwin County

# of Applicants	# of Inspections	# Inspected with Damage	# Repair or Replacement Assistance Received	Total FEMA RP Verified Loss	Average FEMA RP Verified Loss
21,127	6,758	5,587	2,871	\$36,750,156	\$6,578

Source: FEMA IA (2020)

For renter-occupied units, there were 7,495 FEMA IA applicants (Table 6). The average FEMA Personal Property Verified Loss was \$1,911.

Table 6: FEMA IA Verified Loss for FEMA IA Tenant-Occupied Units, Baldwin County

# of Applicants	# of Inspections	# Inspected with Damage	# Personal Property Assistance Received	Total FEMA PP Verified Loss	Average FEMA Verified Loss
7,495	3,014	1,988	920	\$3,798,596	\$1,911

Source: FEMA IA (2020)

2.2 Demographics

This section examines demographics and social vulnerability within Baldwin County to inform disaster recovery program design.

Baldwin County has a total population of 233,420, making it the fourth largest county in Alabama. It is also the fastest growing county in the state, having experienced a 29 percent increase in population between 2010 and 2020 due to migration into the county. The metro area (Daphne-Fairhope-Foley, AL) also ranks as one of the fastest growing metro areas in the United States.²

Of the total population in Baldwin County, 57.6 percent of the population is between the ages of 18 and 65, 21.2 percent is 65 years and older, and 21.1 percent of the population is under age 18. Approximately 14 percent of the population in Baldwin County has a disability.

In 2022, Baldwin County’s ethnic and racial makeup was 4.6 percent Hispanic or Latino, 84 percent White or Caucasian, 8.3 percent Black or African American, and 6.4 percent Other (Table 7).

² Baldwin Economic Development Alliance. Demographic Data. Available at <https://baldwineda.com/baldwin-by-the-numbers/demographic-data/>

Table 7: Demographics, Baldwin County, 2022

Demographic	Count	Percent
Total Population	233,420	
Under 5 years	12,104	5.2%
65 years and over	49,499	21.2%
Population with a Disability	31,878	13.9%
Ethnicity		
Hispanic or Latino of any Race	10,737	4.6%
Not Hispanic or Latino	222,683	95.4%
Race		
White or Caucasian	195,998	84.0%
Black or African American	19,445	8.3%
American Indian and Alaska Native	848	0.4%
Asian	2,046	0.9%
Native Hawaiian and Other Pacific Islander	31	0.0%
Other	15,052	6.4%

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates (2022)

Federally Recognized Tribe

The Poarch Band of Creek Indians, a federally recognized tribe with approximately 2,200 members, has sovereign tribal land north of Baldwin County. The Poarch Band of Creek Indians is currently governed by a nine-member elected Tribal Council and has a Poarch Creek Indians Housing Authority that was established in 1984 with the goal of providing housing to low-income tribal households and elderly Tribal members.³ The tribe also operates the Creek Indian Enterprises Development Authority to create business opportunities across multiple sectors, including hospitality, retail and manufacturing. In 2012, the Poarch Band of Creek Indians partnered with the City of Foley to build the OWA Parks and Resort in Foley, AL. In 2023, the Tribe partnered with the City of Foley and Holtz Companies to develop a seasonal workforce campus in Foley with two residence halls which could house 600 seasonal workers. Future expansions will eventually house 2,400 seasonal workers.⁴

Population by Gender

From 2020 to 2022, the overall population of Baldwin County grew by 6.9 percent, while the male population grew 7.7 percent, and the female population grew by 6.2 percent (Table 8). While the rate of growth was slightly higher for men, there are a greater number of women in Baldwin County overall.

³ State of Alabama Indian Affairs Commission. History of Poarch Band of Creek Indians. Available at: https://aiac.alabama.gov/tribes_poarchcreek.aspx

⁴ Poarch Band of Creek Indians. Poarch Band of Creek Indians Partner with City of Foley and Holtz companies to Launch an Innovative Seasonal Workforce Campus. 2023. Available at: <https://pci-nsn.gov/poarch-band-of-creek-indians-partners-with-city-of-foley-and-holtz-companies-to-launch-an-innovative-seasonal-workforce-campus/>

Table 8: Gender by Year, Baldwin County

Year	Sum of Total Population	Sum of Male Population	Sum of Female Population	Average Ratio of Males to Females
2017	246,435	120,664	125,771	.96:1
2020	218,289	105,889	112,400	.94:1
2022	233,420	114,077	119,343	.96:1

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

Family Status

In 2022, there were 49,330 individuals under the age of 18 in Baldwin County households (Table 9). In 2022, 75.2 percent of children were in married-couple households, 5.8 percent of children were in households with a cohabitating couple, 3.2 percent of children were in households with a male householder/no spouse present, and 15.8 percent of children were in households with female householder/no spouse present.

Table 9: Family Status by Year, Baldwin County

	2017	2020	2022
Population Under 18 in Households (excluding Householders, Spouses, and Unmarried Partners)	44,851	46,902	49,330
Population Under 18 years in Married-Couple Households	33,427	36,345	37,080
Population Under 18 Years in Cohabiting Couple Households	-	1,944	2,852
Population Under 18 Years in Male Householder, No Spouse/Partner Present Households	2,195	1,603	1,603
Population Under 18 Years in Female Householder, No Spouse/Partner Present Households	9,057	7,010	7,795
Percent of Children in Married-Couple Households	74.5%	77.5%	75.2%
Population Under 18 years in Married-Couple Households	33,427	36,345	37,080
Percent of Children in Cohabiting Couple Households	-	4.1%	5.8%
Percent of Children in Male Householder, No Spouse/Partner Present Households	4.9%	3.4%	3.2%
Percent of Children in Female Householder, No Spouse/Partner Present Households	20.2%	14.9%	15.8%

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

Foreign-Born Population

Baldwin County has a growing foreign-born population, with about 3.5 percent of the total population born outside of the United States and half of the foreign-born population coming from Latin America. In 2022, 4,182 Baldwin County residents were not U.S Citizens and may have barriers to accessing federal and state disaster resources (Table 10).

Table 10: Foreign-Born Population, Baldwin County

	2017	2020	2022
Place of Birth by Country			
Sum of population who is foreign-born	6,606	7,469	8,106
Percent of population who is foreign-born	3.2%	3.4%	3.5%
Sum of foreign-born population born in Europe	1,508	1,702	1,834
Percent of foreign-born population born in Europe	22.8%	22.8%	22.6%
Sum of foreign-born population born in Asia	1,209	1,385	1,650
Percent of foreign-born population born in Asia	18.3%	18.5%	20.4%
Sum of foreign-born population born in Africa	145	285	155
Percent of foreign-born population born in Africa	2.2%	3.8%	1.9%
Sum of foreign-born population born in Oceania	66	41	62
Percent of foreign-born population born in Oceania	1.0%	0.5%	0.8%
Sum of foreign-born population born in Latin America	3,471	3,760	3,950
Percent of foreign-born population born in Latin America	52.5%	50.3%	48.7%
Sum of foreign-born population born in Northern America	207	296	455
Percent of foreign-born population born in Northern America	3.1%	4.0%	5.6%
Citizenship Status			
Naturalized U.S Citizen	3,171	3,691	3,924
Not a U.S Citizen	3,435	3,778	4,182

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

Veterans

Over the past seven years, veterans consistently accounted for 11 to 12 percent of the civilian population 18 years or older (Table 11). In 2022, 44.4 percent of the veteran population served in the Vietnam War, 55.9 percent were over the age of 65, and 91.3 percent were male. Veterans in Baldwin County are more likely to have a disability (29.4 percent) than the non-veteran civilian population.⁵

Table 11: Veteran Status, Baldwin County

	2017	2020	2022
Civilian population 18 years and older	158,135	170,975	183,337
Number veterans	18,888	19,174	20,740
Percent veterans	11.9%	11.2%	11.3%

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

Household Income

Given that CDBG-DR projects must benefit low- to moderate-income (LMI) populations, the LRPP guidelines state that recovery activities should prioritize benefiting LMI populations.⁶ Recovery programs in Baldwin County will principally benefit LMI persons. Generally, for CDBG programs, low income is based on 50 percent of area median income (AMI), while moderate income is 80 percent of AMI.⁷ Table 14 lists LMI limits for Baldwin County.

The median household income in Baldwin County is \$89,100 (Table 14). In 2022, the per capita income was \$38,907 (Table 12). Table 13 shows that in 2022, 23,445 individuals in Baldwin County had incomes below the poverty level, and 37 percent of the population were considered low- to moderate-income (LMI).

Table 12: Income and Poverty Levels by Year, Baldwin County

Year	Median Household Income	Per Capita Income	Number with Income Below Poverty Level (past 12 months)	Percent with Income Below Poverty Level (past 12 months)
2017	\$ 52,562	\$ 29,364	23,728	11.8%
2020	\$ 61,756	\$ 33,751	19,739	9.2%
2022	\$ 71,039	\$ 38,907	23,445	10.2%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017, 2020, 2022)

⁵ U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates (2022).

⁶ Alabama Department of Economic and Community Affairs. (2023) Local Recovery Planning Program. Available at: <https://adeca.alabama.gov/wp-content/uploads/LRPP-Program-Guidelines.pdf>.

⁷ HUD Exchange. ACS 5-Year 2011-2015 Low and Moderate Income Summary FAQs. Available at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-faqs-2011-2015/>.

Table 13: Income Demographics – Low Income, Baldwin County, 2022

Income/Economic Demographics	Estimate
Income in the past 12 months below poverty level	23,445

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates (2022)

Table 14: Low and Moderate Income (LMI) Limits, Baldwin County, 2024

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Very Low (<50% AMI)	\$31,200	\$35,650	\$40,100	\$44,550	\$48,150	\$51,700	\$55,250	\$58,850
Low (<80% AMI)	\$49,950	\$57,050	\$64,200	\$71,300	\$77,050	\$82,750	\$88,450	\$94,150
Median Family Income (FY 24)						\$89,100		

Source: HUD FY 2024 Income Limits Summary

Table 15: Low and Moderate Income (LMI) Analysis, Baldwin County

Income Level	Total LMI Persons	Low Mod Universe (Persons with the potential for being considered low-, moderate- and middle- income)	Percent LMI
Very Low (<50% AMI)	40,403	192,305	21.0%
Low (<80% AMI)	71,983	192,305	37.4%
Moderate (<120% AMI)	109,524	192,305	57.0%

Source: HUD LMISD Calculations (2022)

Using U.S. Department of Housing and Urban Development (HUD) income limits for 2020 and FEMA IA income ranges, there are roughly 16,791 households that applied for FEMA IA after the 2020 hurricanes in Baldwin County that are also LMI households (Table 16).

Table 16: Number of FEMA IA Applicants by LMI Category, Baldwin County, 2020

< 80% AMI	Over 80% AMI	Potential LMI (No Income Stated)	Grand Total
16,791	5,813	6,091	28,695

Source: FEMA IA (2020), HUD Income Limits (2020)

2.3 Housing Unmet Need

This section provides an overview of the housing unmet need in Baldwin County as a result of the DR-4563 and DR-4573 disasters. This section uses the methodology provided by the LRPP guidelines to calculate housing unmet needs, which uses FEMA Individual Assistance (FEMA IA) data and U.S. Small Business Administration (SBA) data to calculate total county-wide housing loss, as well as publicly available data from U.S. Census, U.S. Department of Housing and Urban Development (HUD), and social vulnerability data from the Centers for Disease Control and Prevention (CDC).

2.3.1 PRE-DISASTER LOCAL HOUSING CONDITIONS

Between 2017 and 2020, the total housing stock in Baldwin County increased overall by 6,724 units, or 6.1 percent. The types of housing that make up the County’s housing inventory are listed in Table 17, with single unit/single-family detached homes, large apartment buildings (20 or more units), and mobile homes accounting for almost 90% of the overall housing stock.

Prior to the disaster, most homes in Baldwin County were detached single-unit, single-family housing. The inventory of detached single-unit, single family homes has increased from 69,018 in and 62.7 percent in 2017 to 80,703 and 64.5% in 2022. In 2017, large apartment buildings (20 or more units) were the second most common housing type in the County. The number of large apartment buildings in the County has decreased by approximately 240 since then, and now make up 13% of local housing stock. The number of mobile homes in the County has increased since 2017, and as of 2022 accounted for 12,752 homes and 10.2% of housing stock.

Table 17: Pre-Disaster Type of Housing Stock, Baldwin County

Housing Type	2017		2020		2022	
	Number	Percent	Number	Percent	Number	Percent
Total housing units	110,023	110,023	116,747	116,747	125,113	100%
1-unit, detached	69,018	62.7%	75,314	64.5%	80,703	64.5%
1-unit, attached	1,300	1.2%	1,354	1.2%	1,676	1.3%
2 units	1,821	1.7%	2,045	1.8%	1,966	1.6%
3 or 4 units	2,781	2.5%	2,518	2.2%	2,606	2.1%
5 to 9 units	2,406	2.2%	3,816	3.3%	4,004	3.2%
10 to 19 units	3,808	3.5%	3,960	3.4%	4,482	3.6%
20 or more units	16,488	15.0%	15,553	13.3%	16,248	13.0%
Mobile home	12,285	11.2%	11,893	10.2%	12,752	10.2%
Boat, RV, van, etc.	116	0.1%	294	0.3%	676	0.5%

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

In 2017, 22.4 percent of the housing stock was built before 1980 (Table 18). Housing stock built prior to 1980 has a substantially higher lead risk than housing built after 1980.⁸ The percentage of older homes relative to the total housing stock has been declining and, as of 2022, represented 19.5 percent of the housing stock. Aging homes may also have higher disaster risk, be less energy efficient, and have higher maintenance and energy costs. There is also concern that aging housing stock may not be up to building code and may require more extensive repairs and retrofits if damaged during a disaster.⁹

⁸ EPA. Report on the National Survey of Lead-Based Paint in Housing. 1995. Available at: <https://www.epa.gov/sites/default/files/documents/r95-003.pdf>

⁹ Brookings. How to nudge Americans to reduce their housing exposure to climate risks. 2023. Available at: <https://www.brookings.edu/articles/how-to-nudge-americans-to-reduce-their-housing-exposure-to-climate-risks/>

Table 18 18: Pre-Disaster Age of Housing Stock, Baldwin County

Year Structure Built	2017		2020		2022	
	Number	Percent	Number	Percent	Number	Percent
Total Housing Units	110,023		116,747		125,113	
Built 2020 or later			7,667	6.6%	1,956	1.6%
Built 2010 to 2019	5,512	5.0%	5,171	4.4%	18,681	14.9%
Built 2000 to 2009	32,970	30.0%	31,376	26.9%	33,475	26.8%
Built 1990 to 1999	27,459	25.0%	29,096	24.9%	28,452	22.7%
Built 1980 to 1989	19,413	17.6%	19,399	16.6%	18,209	14.6%
Built 1970 to 1979	11,167	10.1%	10,477	9.0%	10,937	8.7%
Built 1960 to 1969	5,744	5.2%	6,208	5.3%	6,530	5.2%
Built 1950 to 1959	3,581	3.3%	3,044	2.6%	2,787	2.2%
Built 1940 to 1949	2,035	1.8%	1,858	1.6%	1,574	1.3%
Built 1939 or earlier	2,142	1.9%	2,451	2.1%	2,512	2.0%

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

In 2017, owner-occupied units made up 72.9 percent of housing in the County, with the other 27.1 percent occupied by renters (Table 19). Owner-occupied homes increased by over 15,000 units between 2017 and 2022, while renter-occupied homes decreased slightly by 569 units.

Table 1919: Pre-Disaster Housing Tenure, Baldwin County

	2017		2020		2022	
Occupied housing units	76,133		84,047		90,802	
Owner-occupied	55,470	72.9%	64,716	77.0%	70,708	77.9%
Renter-occupied	20,663	27.1%	19,331	23.0%	20,094	22.1%
Average household size of owner-occupied unit	2.69	(X)	2.63	(X)	3	(X)
Average household size of renter-occupied unit	2.48	(X)	2.34	(X)	2	(X)

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

Prior to Hurricanes Sally and Zeta, DR-4563 about 60 percent of renter households paid less than \$1,000 in rent. By 2022, the number of renter households paying less than \$1,000 in rent decreased by more than 55%. As Table 20 shows, the cost of rental units has consistently increased since 2017. The median rent price was \$904 in 2017 and \$1,032 in 2020. Fewer rental units available for less than \$999 in 2022 than in previous periods.

Table 2020: Pre-Disaster Rent Cost, Baldwin County

	2017		2020		2022	
Occupied units paying rent	18,148		17,016		17,892	
Less than \$500	1,988	11.0%	1,363	8.0%	889	5.0%
\$500 to \$999	9,047	49.9%	6,585	38.7%	5,251	29.3%
\$1,000 to \$1,499	5,548	30.6%	6,188	36.4%	6,964	38.9%
\$1,500 to \$1,999	920	5.1%	2,187	12.9%	3,418	19.1%

\$2,000 to \$2,499	414	2.3%	484	2.8%	856	4.8%
\$2,500 to \$2,999	30	0.2%	56	0.3%	283	1.6%
\$3,000 or more	201	1.1%	153	0.9%	231	1.3%
Median (dollars)	\$ 904	(X)	\$ 1,032	(X)	\$ 1,160	(X)

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

In 2017, of those Baldwin County renters whose rent as percentage of household income could be computed, about 49 percent of renters could be considered rent burdened, meaning that those households paid more than 30 percent of their household income in rent. The number of rent-burdened households decreased in 2020 but has since increased to 50.8 percent. Renters who pay 35 percent of household income in rent increased from 7,006 to 7,422 between 2017 and 2022 (Table 21).

Table 2121: Pre-Disaster Gross Rent as a Percent of Household Income

	2017		2020		2022	
Occupied units paying rent (excluding units where GRAPI cannot be computed)	17,948		16,790		17,649	
Less than 15.0 percent	2,226	12.4%	1,951	11.6%	2,034	11.5%
15.0 to 19.9 percent	2,233	12.4%	2,513	15%	2,375	13.5%
20.0 to 24.9 percent	2,318	12.9%	2,671	15.9%	2,663	15.1%
25.0 to 29.9 percent	2,377	13.2%	1,941	11.6%	1,628	9.2%
30.0 to 34.9 percent	1,788	10%	1,548	9.2%	1,527	8.7%
35.0 percent or more	7,006	39.0%	6,166	36.7%	7,422	42.1%
Not computed	2,715	(X)	2,541	(X)	2,445	(X)

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

In 2017, Baldwin County had a vacancy rate of 30.8 percent, well above the 2017 national average of 12.2 percent (Table 22). While the vacancy rate has decreased to 27.4 percent, it is still significantly higher than national average.

The census determines a unit is “vacant” when no one is living in the unit at the time of the annual survey, unless the absence is temporary.¹⁰ Before the disaster, the rental vacancy rate was higher than the vacancy rate for owner-occupied units (Table 23). This indicates that there was a greater supply of available rental units than units for sale in Baldwin County prior to the storms.

¹⁰ Census.gov Housing Definitions, <https://www.census.gov/housing/hvs/definitions.pdf>

Table 2222: Pre-Disaster Vacancy Rates, Baldwin County

	2017	2020	2022
Total Housing Units	110,023	116,747	125,113
Occupied Housing Units	76,133	84,047	90,802
Vacant Housing Units	33,890	32,700	34,311
Vacancy Rate	30.8%	28.0%	27.4%

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

Table 2323: Pre-Disaster Owner and Rental Vacancy Rates, Baldwin County

% Owner-Occupied Units	% Renter Occupied Units	Owner Vacancy Rate	Renter Vacancy Rate
72%	28%	3%	46%

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates (2022)

In 2022, the highest categories of vacancy are “for seasonal, recreational, or occasional use” and vacant rental units. Given that there are 90,802 housing units in Baldwin County, the vacant vacation homes and vacant rentals represent a large portion (almost 30 percent) of the housing supply. Vacant units for rent and those for seasonal, recreational, or occasional use in Baldwin County make up a greater proportion of housing units in the County as compared to the state overall (Table 24).

Table 2424: Vacancy Status, Baldwin County, 2022

	Number of Units, Baldwin County	Percent of Total Housing Supply, Baldwin County	Percent of Total Housing Supply, Alabama
Total:	34,311		
For rent	13,430	14.8%	2.4%
Rented, not occupied	346	0.4%	0.5%
For sale only	1,412	1.6%	0.8%
Sold, not occupied	974	1.1%	0.7%
For seasonal, recreational, or occasional use	13,609	15.0%	3.2%
For migrant workers	0	0.0%	0.0%
Other vacant	4,540	5.0%	8.2%

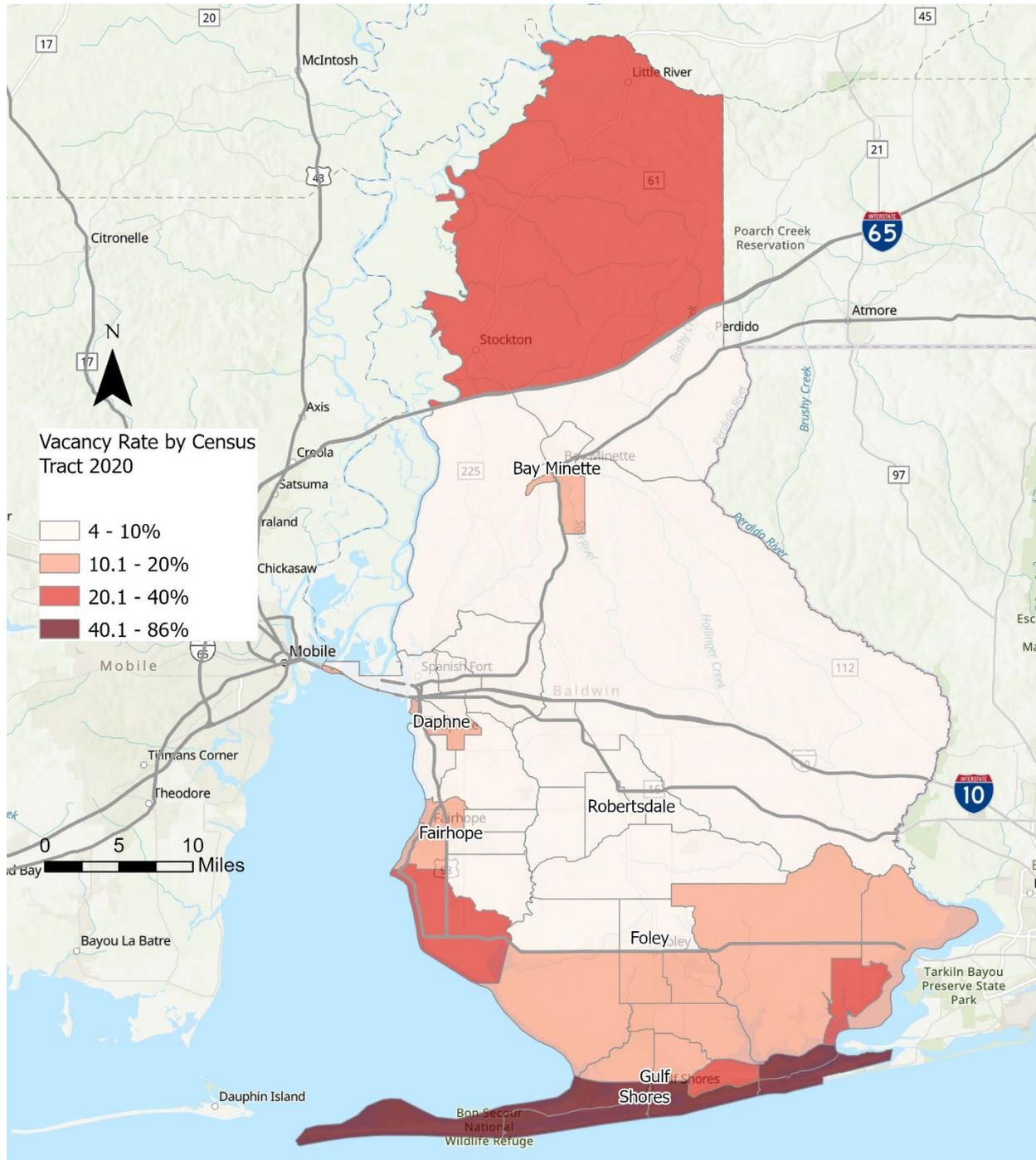
Source: American Community Survey, 5-Year Estimates (2022)

The map below (Figure 1) shows that the highest concentration of vacancies in the County can be found on the coast and in the north of the County. The high coastal vacancies are likely related to the high vacancy rates seen among seasonal, recreational, or occasional use homes. The high vacancies in the north of the County are mostly due to “other vacant” and vacancies due to for seasonal, recreational, or occasional use.

A housing unit is classified as “other vacant” when it does not fit into any other year-round category. Potential examples of “other vacant” units include residential properties where an owner uses a house for storage but does not reside in the house; homes owned by a person who is elderly or disabled and living in a nursing home; or a house that is being held for settlement, is under foreclosure, is undergoing major repairs or renovations, etc.¹¹

¹¹ Census.gov “Other” Vacant Housing Units: An Analysis from the Current Population Survey/Housing Vacancy Survey. Available at: <https://www.census.gov/housing/hvs/files/qtr113/PAA-poster.pdf>

Figure 1: Vacancy Rate by Census Tract, 2020



Source: U.S. Census, 2020 Census

2.3.2 HOUSING UNMET NEEDS METHODOLOGY

The housing unmet needs assessment uses disaster damage and payments data from FEMA Individual Assistance (IA) and U.S. Small Business Administration (SBA) as well as data from U.S. Census American Community Survey, Zillow property data, U.S. Department of Housing and Urban Development (HUD), and National Flood insurance Program (NFIP) building payments to estimate total housing loss, total housing support, and total housing unmet need in Baldwin County. Modeled after the unmet needs assessment in the Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan from the Alabama Department of Economic and Community Affairs (ADECA), this housing unmet needs assessment focuses on disaster impacts on renter-occupied properties rather than owner-occupied properties, which are receiving support through separate ADECA CDBG-DR housing programs.¹²

HUD calculates unmet housing needs as the number of housing units with unmet needs times the estimated cost to repair those units minus repair funds already provided. Following the ADECA methodology, this assessment uses the following variables to calculate housing unmet need:

Housing loss:

- FEMA IA applicants for renter-occupied units by HUD damage categories
- Average SBA real estate loss by HUD damage categories
- Estimated additional damage to FEMA IA renter applicants without FEMA verified loss
- Estimated damage to disaster survivors who did not apply for FEMA IA
- Damage to rental properties from SBA

Housing support:

- FEMA payments to repair homes
- SBA loan amounts
- Estimated NFIP building payments
- Payments to rental properties from SBA

HUD categories for damage to owner-occupied units:

- Minor-Low: Less than \$3,000 of FEMA inspected real property damage
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor
- Severe: Greater than \$28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor

¹²ADECA. CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>.

HUD categories for damage to renter-occupied units:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage.
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

Table 25 provides a high-level summary of Baldwin County’s unmet housing needs using the unmet needs calculation provided in the LRP guidelines. The initial estimate and funds available are calculated using FEMA IA and SBA home data. Fifteen percent is added to the initial impact estimate to account for resilience costs, for a total unmet housing needs estimate of \$194.8 million.

Table 25: High-Level Housing Unmet Need Calculation

	Housing
[A] Amount of Initial Estimated Impact	\$186,715,223
[B] 15% Resilience Costs	\$28,007,284
[C] Total Estimated Impact = [A] + [B]	\$214,722,507
[D] Amount of Funds Available from Other Sources	\$19,937,050
Unmet Needs = [C] – [D]	\$194,785,457

Source: FEMA IA (2020); SBA (2020); Zillow (2024)

FEMA IA data may underestimate the true extent of damage. FEMA loss estimates are lower than SBA estimates for both real property and personal property due to the FEMA damage assessment methodology. This assessment uses average SBA verified property loss by HUD damage category to calculate to estimated housing loss (Table 26).

Table 26: Average SBA Verified Property Loss Values by Geography and HUD Damage Category

Minor-Low	Minor-High	Major-Low	Major-High	Severe
\$1,491	\$5,515	\$11,718	\$22,506	\$76,096

Source: SBA (2020), HUD (2020)

In addition, this assessment uses Zillow property data for single-family homes in Baldwin County as a proxy for reconstruction costs for those properties with Major-High and Severe damage. In order to estimate damage among renters who did not apply for FEMA IA, this assessment subtracts the number of FEMA IA applicants from the total number of renter-occupied housing units in Baldwin County and applies the average SBA verified loss for Minor-Low units (Table 27).

Table 27: Baldwin County Data Utilized in this Housing Impact and Unmet Needs Assessment

	Zillow Single Family Home Value	66% of Zillow Single Family Home Value	Total FEMA Applicants	Total Occupied Housing Units	Total Renter-Occupied Housing Units	% SBA Applications without a FEMA Registrant ID
2020	\$236,331	\$155,978	28,695	84,047	19,331	8%
2022	\$326,874	\$215,737		90,802	20,094	
March 2024	\$346,336	\$228,582				

Source: FEMA IA (2020), Zillow Home Value Index (2024), American Community Survey, 5-Year Estimates (2022)

According to FEMA IA data and SBA data, the 2020 hurricanes resulted in 28,622 FEMA IA applicants and 5,725 SBA home loan applicants (Table 28).

Table 28: Total Number of FEMA IA and SBA Applicants, Baldwin County

FEMA IA Applicants	SBA Home Applicants
28,622	5,725

Source: FEMA IA (2020); SBA (2020)

Table provides an overview of the housing unmet needs analysis. The analysis focused on renter-occupied properties for which data was available. To determine the unmet needs for renters that applied for the FEMA IA program, the table below takes the number of FEMA IA applicants and multiplies it by the Average Real Loss of property determined by SBA housing data. This calculation produced a total unmet housing need of \$194,785,457.

Table 29: Housing Unmet Needs Analysis

Data	Data Detail	FEMA IA Applicants (Renters)	SBA Average Real Loss	Estimated Total Loss/Support
Minor-Low Damage to FEMA IA Applicants	Real property (repair) losses from SBA for applicants with FEMA Minor-Low damage	804	\$1,491	\$1,198,764
Minor-High Damage to FEMA IA Applicants	Estimate of losses for FEMA applicants with FEMA Minor-High damage	513	\$5,515	\$2,829,195
Major-Low Damage to FEMA IA Applicants	Applicants with at least Major-Low FEMA Verified Losses	413	\$11,718	\$4,839,534
Major-High or Severe Damage to FEMA IA Home Applicants	# of applicants with Major-High or Severe damage multiplied by 66% of Zillow property value	258	\$228,582	\$58,974,156
Major-High or Severe Damage to FEMA IA "Other" Applicants	Non-house FEMA IA Applicants with major-high or severe damage	0	—	0
Estimated Additional Damage to Applicants without PPFVL	Estimated damage to all FEMA applicants for which an inspection did not take place or for which no damages were found	5,507	\$1,491	\$8,210,937
Estimated Additional Damage to Disaster Survivors Who Did not Apply for FEMA	Total FEMA applicant population (Rows A-F) subtracted from the total number of occupied housing units in each county, multiplied by the % of SBA home loan applications that did not have a FEMA Registrant ID	12,599	\$1,491	\$18,785,109
Estimated Damage to Public Housing	Lacking sufficient data	—	—	0
Damage to Rental	Per SBA Business Data	—	—	\$91,877,528

Data	Data Detail	FEMA IA Applicants (Renters)	SBA Average Real Loss	Estimated Total Loss/ Support
Properties (Landlords)				
Total Housing Loss	The sum total of loss from each line (A-J) total housing losses	—	—	\$186,715,223
Total Housing Loss plus 15% additional for Resilience	Total housing loss value was multiplied by 15% to account for increased cost of compliance and additional building materials necessary to move toward a more resilient society.	—	—	\$214,722,507
FEMA Payments to Repair Homes	—	—	—	\$1,716,550
Estimated NFIP Building Payments	—	—	—	0
Public Housing Funds	—	—	—	0
Payments (Loans) to Rental Properties (Landlords)	—	—	—	\$18,220,500
Total Support	—	—	—	\$19,937,050
Initial Unmet Needs	—	—	—	\$166,778,174
Total Unmet Housing Need plus additional 15% for resilience	Total housing loss plus 15% for resilience, accounting to available recovery resources	—	—	\$194,785,457

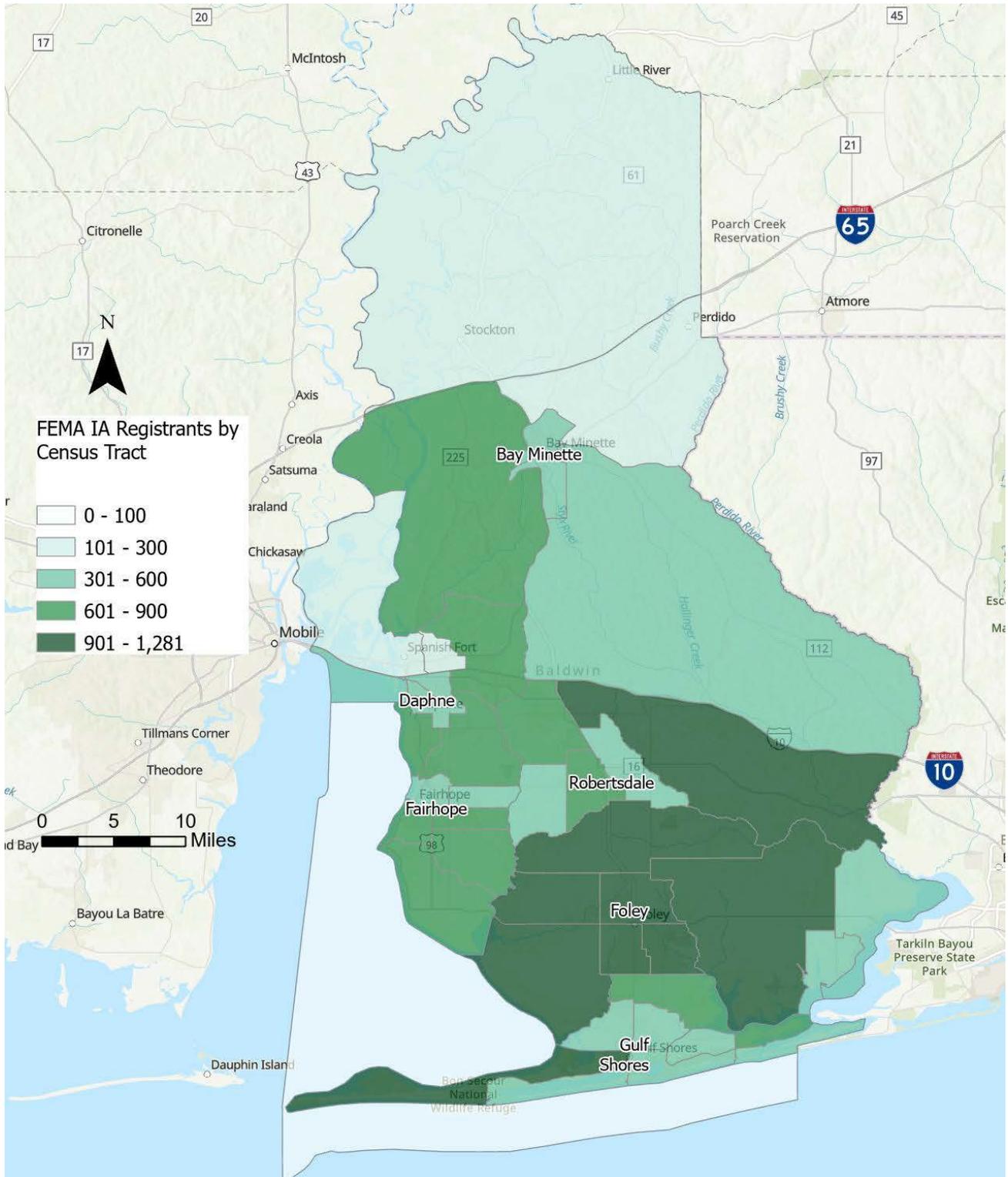
2.3.3 SINGLE FAMILY VERSUS MULTI-FAMILY AND OWNER OCCUPIED VERSUS RENTERS

This section uses data from FEMA IA applications and data representing past and current housing conditions in Baldwin County to assess housing damage and unmet needs resulting from Hurricanes Sally and Zeta. Figure 2 demonstrates that a significant percentage of Baldwin County FEMA IA applicants were located in the southern and central parts of County, and that Gulf Shores and Foley experienced extensive damage during Hurricane Sally.¹³

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¹³ Rural Health Information Hub. COVID-19 and Hurricane Sally Present Dual Threat in Gulf Shores, Alabama. Available at: <https://www.ruralhealthinfo.org/toolkits/emergency-preparedness/case-studies/natural-disasters/gulf-shores-alabama>.

Figure 2: FEMA IA Registrants by Census Tract



Source: FEMA IA (2020), ArcGIS (2024)

After Hurricane Sally, there were 21,127 FEMA IA applicants for owner-occupied units. The average FEMA Real Property Verified Loss was \$6,578 (Table 30).

Table 30: FEMA IA Verified Loss for Owner-Occupied Units, Baldwin County

# of Applicants	# of Inspections	# Inspected with Damage	# Repair or Replacement Assistance Received	Total FEMA RP Verified Loss	Average FEMA RP Verified Loss
21,127	6,758	5,587	2,871	\$36,750,156	\$6,578

Source: FEMA IA (2020)

For renter-occupied units, there were 7,495 FEMA IA applicants (Table). The average FEMA Personal Property Verified Loss was \$1,911.

Table 31: FEMA IA Verified Loss for FEMA IA Tenant-Occupied Units, Baldwin County

# of Applicants	# of Inspections	# Inspected with Damage	# Personal Property Assistance Received	Total FEMA PP Verified Loss	Average FEMA Verified Loss
7,495	3,014	1,988	920	\$3,798,596	\$1,911

Source: FEMA IA (2020)

The majority of FEMA IA applications were for houses/duplexes (68.5 percent), followed by mobile homes (15.6 percent) and apartments (7.2 percent) (Table). While the majority of houses/duplexes were owner-occupied, the majority of apartments were renter-occupied.

Table 32: FEMA IA Applications by Housing Type, Baldwin County

Housing Type	# of Applicants	# Owner Occupied	% Owner Occupied	# Tenant Occupied	% Tenant-Occupied	# Unknown Occupancy Type	% Unknown	% Type
Apartment	2,055	2	0.1%	2,049	99.7%	4	0.2%	7.2%
Assisted Living Facility	2		0.0%	2	100.0%		0.0%	0.0%
Boat	34	31	91.2%	3	8.8%		0.0%	0.1%
College Dorm	1		0.0%	1	100.0%		0.0%	0.0%
Condo	591	443	75.0%	145	24.5%	3	0.5%	2.1%
Correctional Facility	6		0.0%	6	100.0%		0.0%	0.0%
House/Duplex	19,666	16,108	81.9%	3,524	17.9%	34	0.2%	68.5%
Mobile Home	4,487	3,292	73.4%	1,185	26.4%	10	0.2%	15.6%
Other	742	434	58.5%	291	39.2%	17	2.3%	2.6%
Townhouse	224	101	45.1%	122	54.5%	1	0.4%	0.8%
Travel Trailer	887	716	80.7%	167	18.8%	4	0.5%	3.1%
Grand Total	28,695	21,127	73.6%	7,495	26.1%	73	0.3%	100.0%

Source: FEMA IA (2020)

Using HUD damage categories, FEMA IA applications were categorized by Minor-Low, Minor-High, Major-Low, Major-High, and Severe damage for both real property and personal property. There were 131 owner-occupied units with severe damage and 469 units with Major-High damage (Table 33). Among renters, there were 31 units with severe damage to personal property and 227 units with major-high damage (Table 34)

Table 33: FEMA Real Property Damage Owner Occupied Units, Baldwin County

Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe Damage	No Damage	% with Damage	Total
1,752	2,537	698	469	131	15,540	26.4%	21,127

Source: FEMA IA (2020)

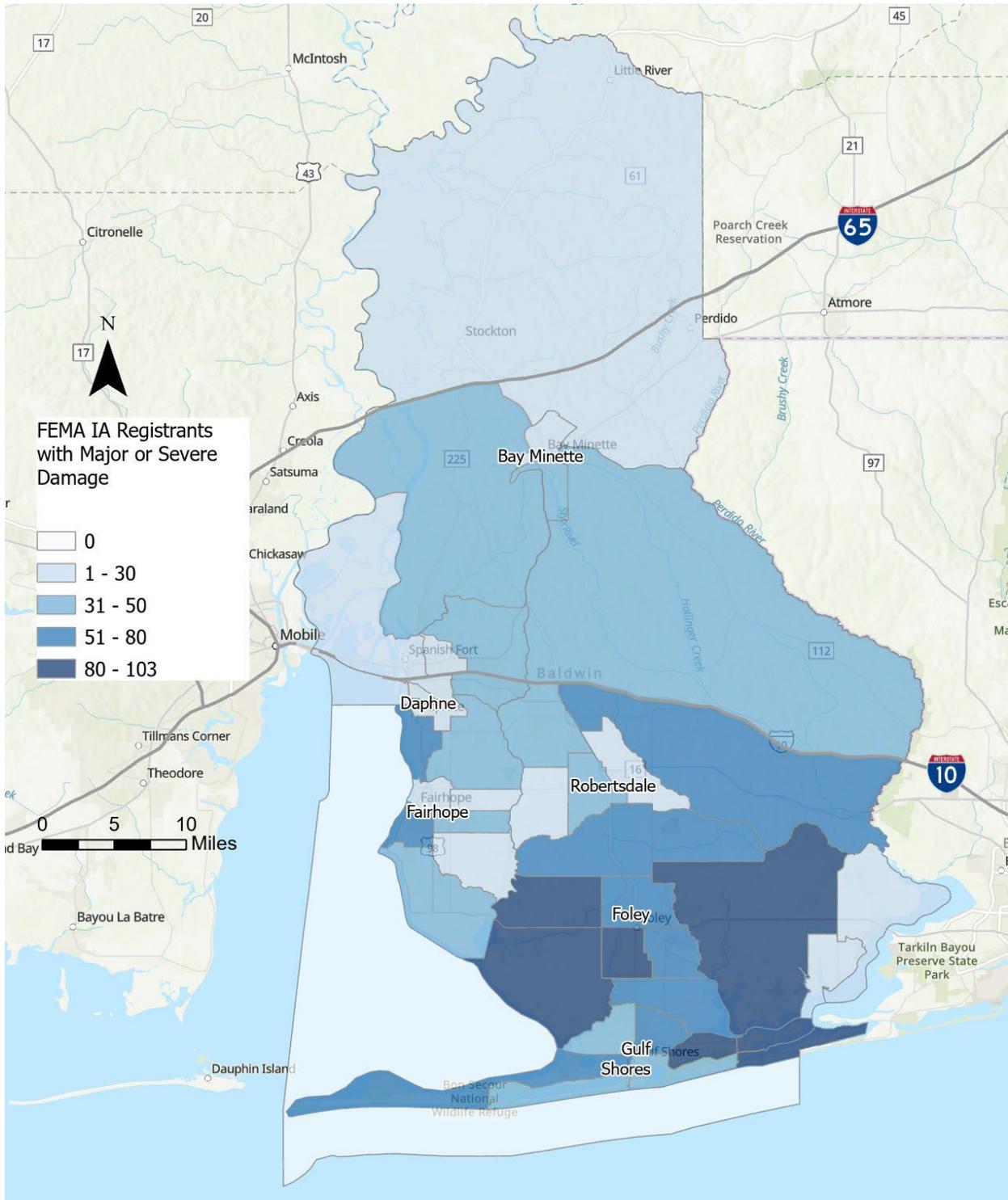
Table 34: FEMA Personal Property Damage to Rental Units, Baldwin County

Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe Damage	No Damage	% with Damage	Total
804	513	413	227	31	5,507	26.5%	1,988

Source: FEMA IA (2020)

There are more FEMA IA registrants with Major-Low, Major-High, or Severe damage in the southern portion of Baldwin County than the rest of the county due to the location of the storm damage (Figure 3).

Figure 3: FEMA IA Registrants with Major or Severe Damage by Census Tract



Source: FEMA IA (2020), ArcGIS (2024)

2.3.3.1 Flood Damage and Insurance Summary

There were 2,322 FEMA IA applicants with flood damage, as recorded by FEMA. The majority of applicants with flood damage were owners (69 percent) and 31 percent were renters (Table 35). The total real property FEMA verified loss (RP FVL), which is the FEMA-determined value of disaster-caused damage to real property components, including floors, walls, access roads and bridges, electrical, plumbing, HVAC, etc., was \$22.8 million.¹⁴ The total personal property FEMA verified loss (PP FVL), which is the FEMA-determined value of disaster-caused damage to personal property components, including appliances, furniture, etc., was \$2.1 million. The total damage was \$24.9 million.

Table 35: FEMA IA Applicants with Flood Damage, Baldwin County

Owners		Renters		Total	
Count with Flood Damage	Total Damage (RP FVL)	Count with Flood Damage	Total Damage (PP FVL)	Count with Flood Damage	Total Damage (RP + PP FVL)
1,592	\$22,805,403	730	\$2,121,127	2,322	\$24,926,530

Source: FEMA IA (2020)

There were 5,350 total FEMA IA applicants without flood damage. Seventy-six percent of those without flood damage were owners, and 24 percent were renters (Table 36).

Table 36: FEMA IA Applicants without Flood Damage, Baldwin County

Owners		Renters		Unknown Type		Total	
Count without Flood Damage	Total Damage (RP + PP FVL)	Count without Flood Damage	Total Damage (RP + PP FVL)	Count without Flood Damage	Total Damage (RP + PP FVL)	Count without Flood Damage	Total Damage (RP + PP FVL)
4,049	\$19,479,893	1,300	\$1,793,351	1	\$875	5,350	\$21,274,119

Source: FEMA IA (2020)

Most FEMA IA applicants in Baldwin County did not have flood insurance (90 percent). Of those without flood insurance, 7 percent had flood damage and real or personal property losses. Just 10 percent of FEMA IA applicants in Baldwin County had flood insurance, and 19 percent of those with flood insurance had flood damage and real or personal property losses (Table 37).

¹⁴ FEMA. OpenFEMA Dataset: Individuals and Households Program – Valid Registrations – v1. Available at: <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>.

Table 37: Number of FEMA IA Applicants with Flood Damage (with or without Flood Insurance), Baldwin County

Applicants without Flood Insurance			Applicants with Flood Insurance		
Total Applicants	Flood Damaged and Sustaining Real or Personal Property Losses	Total Real + Personal Property Losses	Total Applicants	Flood Damaged and Sustaining Real or Personal Property Losses	Total Real + Personal Property Losses
25,849	1,739	\$16,733,978	2,845	545	\$8,192,552

Source: FEMA IA (2020)

Table 38 shows there were 539 owners in a flood zone with non-flood unmet needs per ADECA’s unmet needs assessment, and Table 39 shows there were 673 owners in a flood zone with flood-related unmet needs. The total flood-related unmet need is greater than the non-flood related unmet need.

Table 38: Owners in Flood Zone with Non-Flood Unmet Needs, Baldwin County

Count	Non-Flood Related Unmet Need
539	\$2,164,927

Source: ADECA (2022)

Table 39: Owners in a Flood Zone with Flood-Related Unmet Needs, Baldwin County

Count	Flood-Related Unmet Need
673	\$15,844,964

Source: ADECA (2022)

Table 40 shows the majority of properties with Major-High or Severe damage, both renter- and owner-occupied, were houses/duplexes (688), followed by mobile homes (81), apartments (55), and boats (11).

Table 40: Major-High and Severe Damage to Houses by Type, Owner- and Renter-Occupied, Baldwin County

Apartment	Boat	Condo	House/ Duplex	Mobile Home	Other	Town House	Travel Trailer	Grant Total
55	11	9	688	81	1	7	7	859

Source: FEMA IA, HUD

Similarly, for those properties with Minor-Low, Minor-High, or Major-Low damage, the majority were houses/duplexes (4,012), followed by mobile homes (1,706), travel trailers (461), and apartments (415) (Table 41).

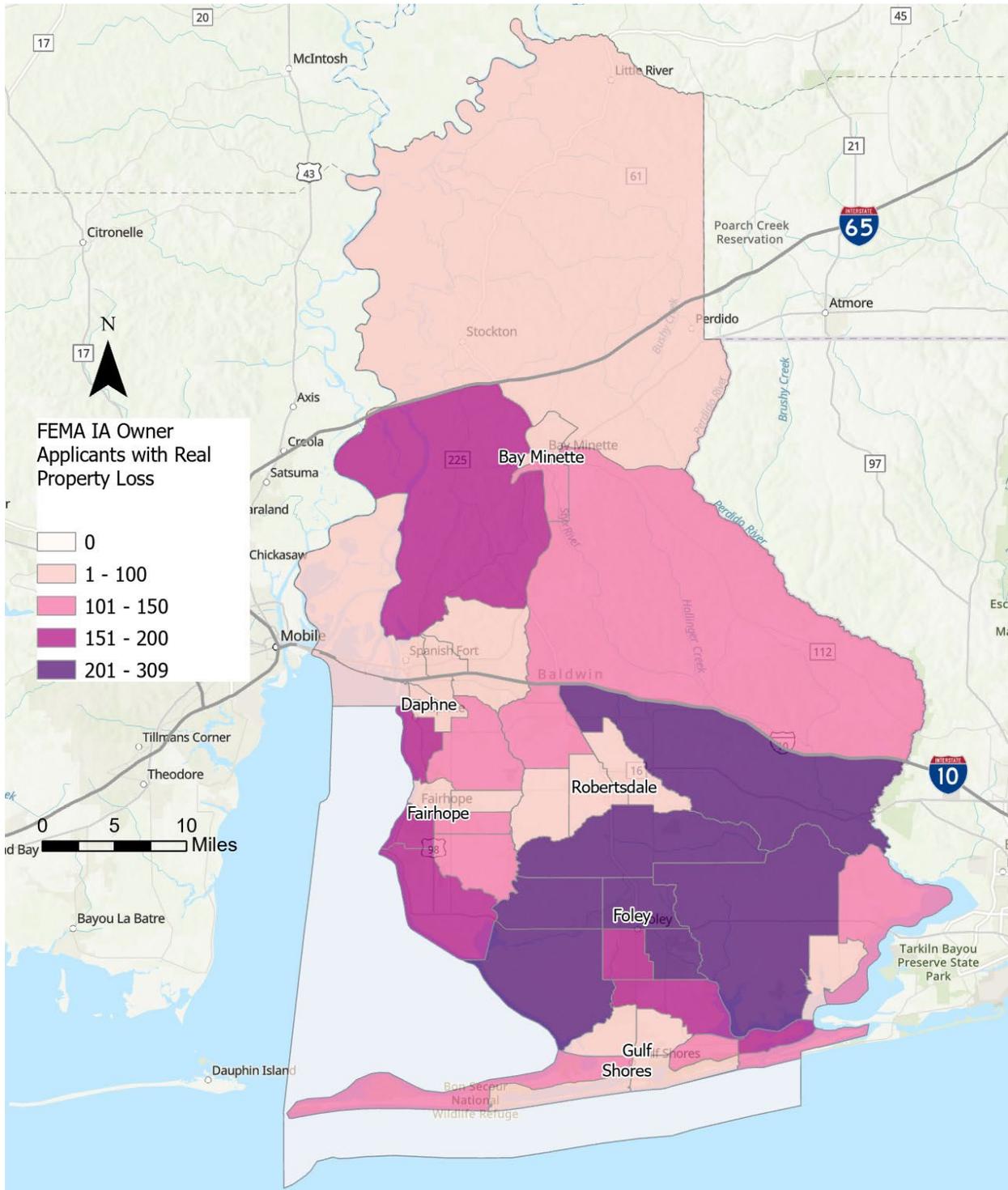
Table 41: Minor-Low, Minor-High, and Major-Low Damage to Houses by Type, Owner- and Renter-Occupied, Baldwin County

Apartment	Boat	Condo	House/ Duplex	Mobile Home	Other	Town House	Travel Trailer	Grant Total
415	5	81	4,012	1,706	12	47	461	6,739

Source: FEMA IA, HUD

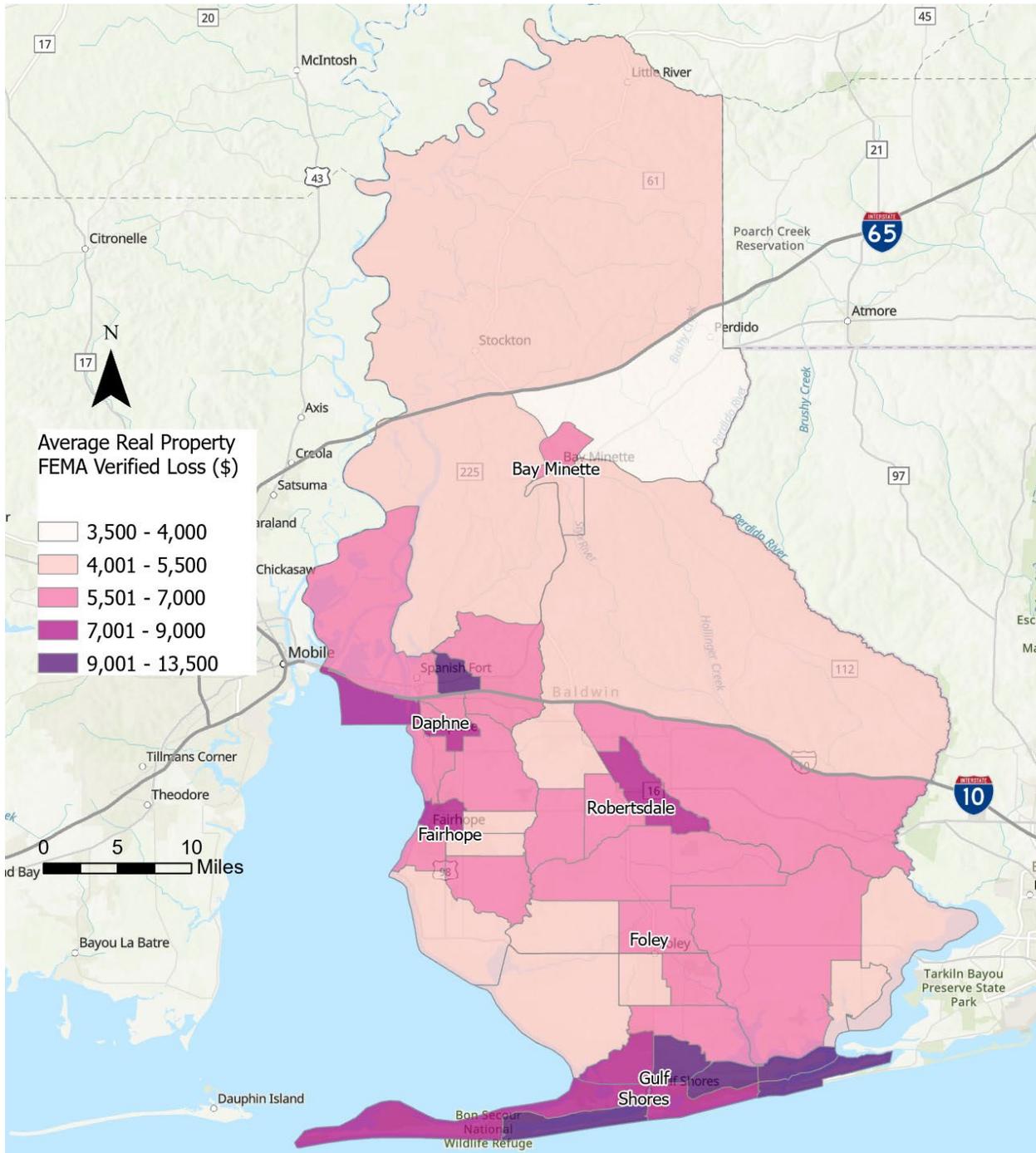
There was a high count of FEMA Real Property Losses in the southern portion of the County with the highest count of applicants in the southeast of the County (Figure 4). Average real property FEMA Verified Loss among owner applicants was highest in the southern and central portions of the county (Figure 5). Total Real Property FEMA Verified Loss was above \$900,000 in the central and southern portion of Baldwin County (Figure 6). Baldwin County experienced substantial storm surge during Hurricane Sally, particularly along its coastal areas. The surge caused severe flooding in low-lying areas, inundating homes, businesses, and infrastructure. Coastal communities like Gulf Shores and Orange Beach were heavily affected.

Figure 4: Count of Owner Applicants with Real Property Losses by Census Tract



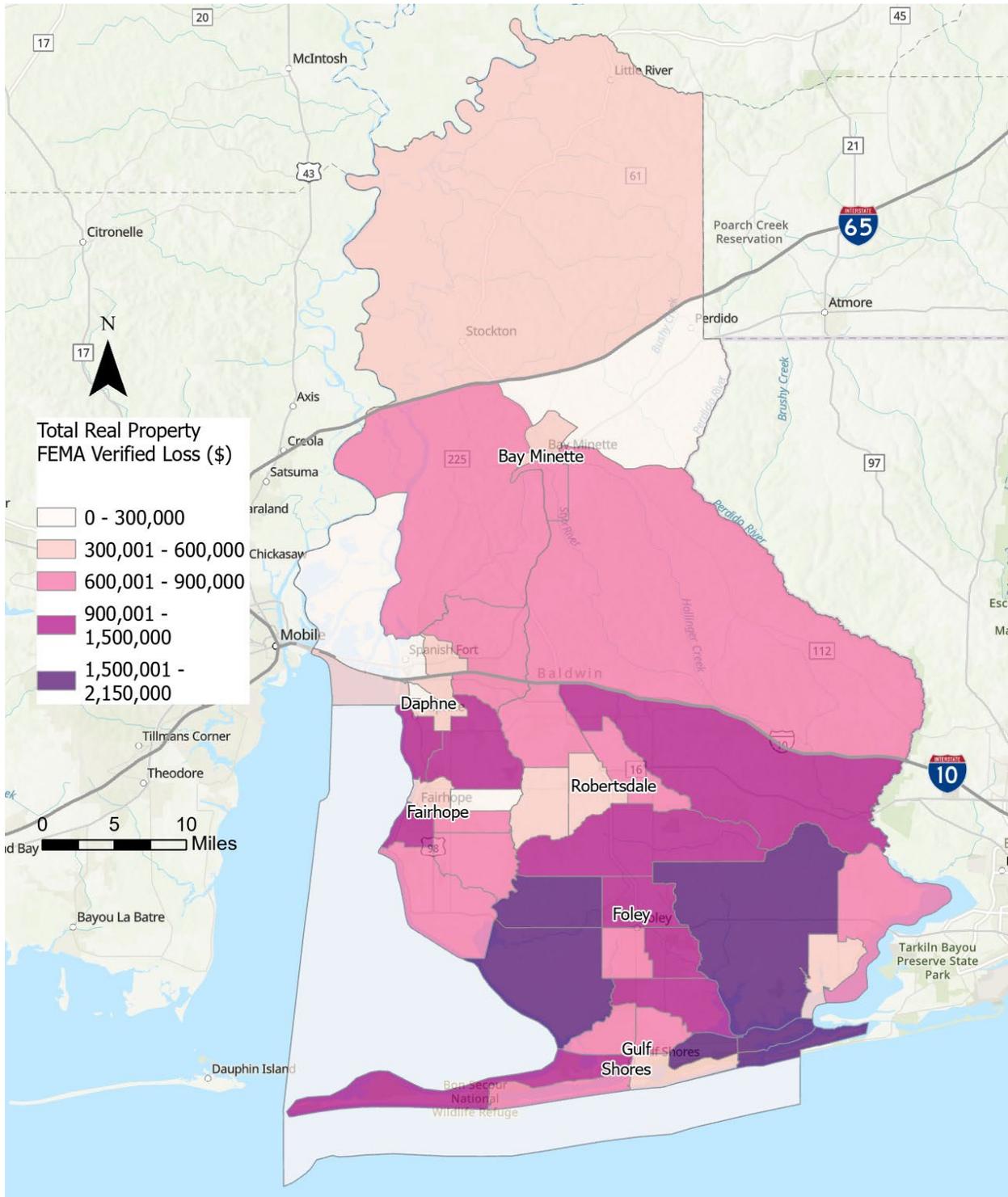
Source: FEMA IA, ArcGIS

Figure 5: Average Real Property FEMA Verified Loss (RPFVL) by Census Tract



Source: FEMA IA, ArcGIS

Figure 6: Total Real Property FEMA Verified Loss (RPFVL) by Census Tract



Source: FEMA IA, ArcGIS

2.3.4 PUBLIC HOUSING AND AFFORDABLE HOUSING

The predominant form of housing within Baldwin County is owner-occupied, single-family units, representing 77.9 percent of all occupied housing units (Table 18). The current median home price in Baldwin County is \$356,900 based on data from the National Association of Realtors collected in the first quarter of 2024¹⁵, which can be affordable for a household earning the median income of \$89,100 with a 15% down payment¹⁶.

Of those renting, 42.1% of renter households pay at least 35% of their incomes towards housing (Table 20), with a median rent of \$1,160 (Table 19).

HUD provides Fair Market Rent rates for federally-supported rental housing, calculated as the 40th percentile of gross rents for standard units in a local housing market. These rent amounts are meant to identify the affordable rates for low-to-moderate income households. In 2022, the fair market rate for a studio or efficiency was \$772, \$777 for a one bedroom, and \$1,017 for a two-bedroom.¹⁷ Table 19 shows that 34.3 percent of renters had rents at or below the fair market rate for a two-bedroom apartment.

There are two public housing authorities in operation within Baldwin County: Bay Minette Housing Authority and Foley Housing Authority. There are 107 units of income-based affordable housing in Bay Minette provided by the Bay Minette Housing Authority through project-based vouchers. The Foley Housing Authority provides housing-choice vouchers and manages affordable housing units.

During Hurricane Sally, several units under project-based vouchers were damaged and the Bay Minette Housing Authority was able to support with repairs¹⁸. There were no reports of displaced occupants or other voucher units being damaged (Table 42).

Table 42: Public Housing Authorities Damaged, Baldwin County

Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
2	0	5	\$0

Source: ADECA (2022), Bay Minette Housing Authority (2024)

Over 10 percent of Baldwin County’s housing stock consists of mobile homes and 4,487 FEMA IA applications were from mobile homes (Table 43). Mobile homes face several risks during disasters due to their lightweight construction and susceptibility to damage from high winds, flooding, and other disaster impacts. Mobile homes and manufactured housing also play a large

¹⁵ Baldwin County Housing Market Summary, National Association of Realtors. Available at https://www.realtor.com/realestateandhomes-search/Baldwin-County_AL/overview

¹⁶ Mortgage Affordability Calculator, Zillow. Available at: <https://www.zillow.com/mortgage-calculator/house-affordability/>

¹⁷ HUD Office of Policy Development and Research. Fair Market Rents. Available at: <https://www.huduser.gov/portal/datasets/fmr.html#year2024>

¹⁸ Stakeholder Consultation, via Zoom with Bay Minette Housing Authority. May 20, 2024.

role in the affordable housing stock, with the potential for disaster damage impacts to low- and moderate-income residents who are less able to recover.

Table 43: Mobile Home Units, Baldwin County

	Total Housing Units	Mobile Homes	Percent of Housing Units that are Mobile Homes	FEMA IA Applications from Mobile Homes	FEMA IA Applications from Mobile Homes as a % of Mobile Home Total
2017	110,023	12,285	11.2%	N/A	N/A
2020	116,747	11,893	10.19%	4,487	37.7%
2022	132,299	14,258	10.78%	4,487	31.5%

Source: American Community Survey, 5-Year Estimates (2017, 2020, 2022)

2.3.5 FAIR HOUSING, CIVIL RIGHTS DATA, AND ADVANCING EQUITY

Baldwin County housing recovery programs will aim to affirmatively further fair housing and provide assistance to those most impacted by the disaster. Recovery programs will advance equity by targeting resources to areas of most need and increasing accessibility for vulnerable populations.

2.3.5.1 Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

Baldwin County has no Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).

2.3.5.2 Social Vulnerability

Social vulnerability refers to the potential negative effects on communities caused by external stresses on human health.¹⁹ The social vulnerability index from the Centers for Disease Control and Prevention (CDC) ranks census tracts on 16 social factors, including unemployment, racial and ethnic minority status, and disability.²⁰ Households and individuals living in tracts with high social vulnerability may have difficulty recovering from a disaster. In Baldwin County, 28 percent of census tracts have a high social vulnerability index, 33 percent have medium social vulnerability, and 40 percent have low social vulnerability (Table 44).

¹⁹ Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry. CDC/ATSDR Social Vulnerability Index. Available at: <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>.

²⁰ CDC/ATSDR. CDC SVI Documentation 2020. Available at: https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html.

Table 44: Number of Census Tracts by SoVI Category, Baldwin County from ADECA

Low	Medium	High	Total
17	14	12	43

Source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

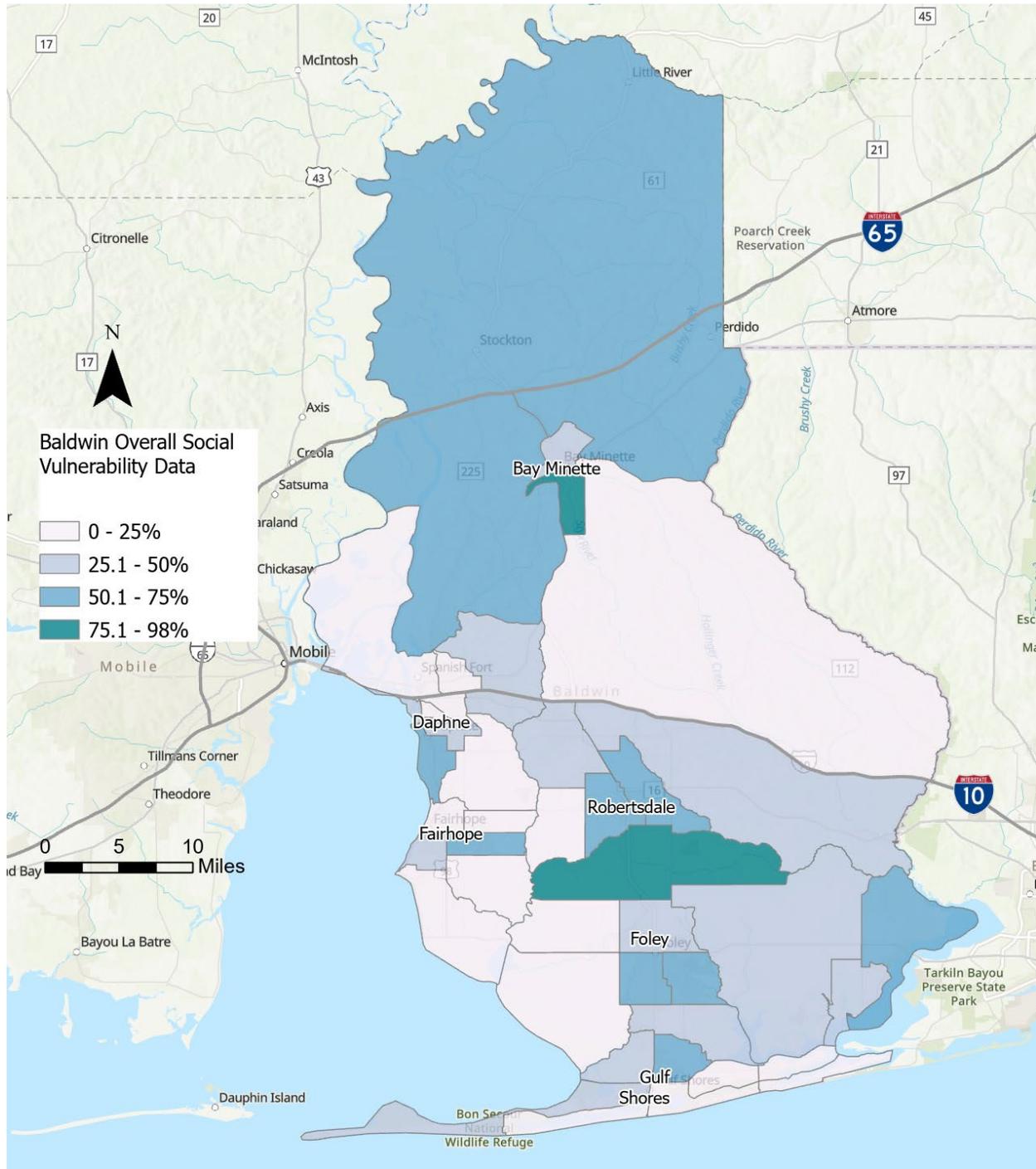
Table 45: Number of Census Tracts by SoVI Category, Baldwin County from ADECA

First Quartile (0 – 25%)	Second Quartile (25.1 – 50%)	Third Quartile (50.1 – 75%)	Fourth Quartile (75.1 – 100%)	Total
18	12	11	2	43

Source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

From the map below (Figure 7), tracts with high social vulnerability are in north Baldwin County including Bay Minette and some areas in south Baldwin County, including the town of Summerdale.

Figure 7: Social Vulnerability Index by Census Tract



Source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

There are 63,443 individuals, or 30.4 percent of the population, living in areas of high social vulnerability in Baldwin County (Table 46).

Table 46: Population by SoVI Category, Baldwin County, 2020

Low	Medium	High	Total
88,817	66,029	63,443	218,289

Source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program. CDC/ATSDR Social Vulnerability Index 2020 Database.

Limited English Proficiency

In 2022, 3.8 percent of the population in Baldwin County spoke English less than ‘very well’ (Table 47). Limited English proficiency (LEP) can present significant challenges for individuals seeking housing, as language barriers may impede their ability to understand rental agreements, communicate with landlords or property managers, and access housing-related services.

Table 47: Limited English Proficiency, Baldwin County

	Number of People Who Speak English Less than ‘Very Well’	Percent of People Who Speak English Less than ‘Very Well’
2017	3,037	1.6%
2020	7,466	3.6%
2022	8,440	3.8%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017, 2020, 2022)

Homelessness

Housing First, Inc., as the lead agency for the Continuum of Care for Mobile and Baldwin counties, conducts the annual point-in-time count of people experiencing homelessness.²¹ In 2022, there were 412 households in Mobile and Baldwin counties experiencing homelessness. The total number of people experiencing homelessness was 585, 148 of which were children (Table 48). Of the total population experiencing homelessness, 42.7 percent were in an emergency shelter, 23.6 percent were in transitional housing, and 33.7 percent were unsheltered.

Table 48: Point-in-Time County by Type of Shelter, Mobile County and Baldwin County, 2022

	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Total Number of Households	154	78	180	412
Total Number of Persons	250	138	197	585
Number of Persons < 18 years of age	87	56	5	148

Source: Housing First Inc. Point-In-Time Count (2022)

²¹ Housing First Inc. Point-In-Time Count. Available at: <https://hfal.org/point-in-time-count/>.

Homelessness was a concern for a number of households impacted by Hurricane Sally. Damage assessments conducted by local organizations determined 221 apartment units were damaged and vacated by residents in Foley and Robertsdale. Family Promise of Baldwin County, a homeless prevention and transitional housing service provider, supported with shelter coordination for 28 families who had damaged rental units, with churches and community centers providing temporary shelter after the disaster. Ultimately, all families were able to find new housing situations within a month after Hurricane Sally²².

Diversity Index

The diversity index from the U.S. Census Bureau measures the probability that two people chosen at random will be from different racial and ethnic groups.²³ The closer the index to 1, or 100%, the more diverse that geography's population. From 2020 Census data, Baldwin County has a diversity index of 34.1 percent (Table 49). Baldwin County has less racial and ethnic diversity than the state of Alabama overall, which has a diversity index of 53.1 percent.

Table 49: Diversity Index, Baldwin County, 2020

Diversity Index
34.1%

Source: U.S. Census Diversity Index (2020)

Persons with Disabilities

Higher percentages of older individuals and individuals with disabilities within communities can contribute to higher vulnerabilities in recovery from a disaster. As shown in Table 7, a fifth of the county's population is elderly and 14 percent of the total population has a disability.

Elderly populations can be particularly vulnerable in the aftermath of a disaster due to factors such as physical frailty, limited mobility, chronic health conditions, and social isolation. Elderly individuals may face increased health risks after a disaster due to lack of access to medical care and disruptions in medication regimens. Elderly individuals may also be more likely to live alone or be socially isolated, increasing their vulnerability during and after disasters when community support systems are disrupted.

People with disabilities may also need access to supportive services, transportation, and other essential services, limiting their ability to relocate or find new housing after a disaster.

These vulnerabilities can be exacerbated if the household is on a limited income and affordable housing options that meet their needs may be scarce.

2.4 Infrastructure Unmet Need

This section provides an overview of infrastructure unmet need in Baldwin County as a result of the DR-4563 and DR-4573 disasters. This section uses FEMA Public Assistance (FEMA-PA)

²² Stakeholder consultation, via Zoom, Family Promise of Baldwin County. May 20, 2024.

²³ U.S. Census. Racial and Ethnic Diversity in the United States: 2010 Census and 2020 Census. Available at: <https://www.census.gov/library/visualizations/interactive/racial-and-ethnic-diversity-in-the-united-states-2010-and-2020-census.html>.

data to capture the types and amount of damages reported by jurisdictions through applications for assistance. To supplement the FEMA-PA data, Baldwin County also surveyed municipalities on any remaining disaster recovery needs related to infrastructure.

2.4.1 PRE-DISASTER INFRASTRUCTURE CONDITIONS

The Multi-Hazard Jurisdictional Hazard Plan 2021 outlines that Baldwin County's greatest infrastructure threats are due to a significant number of critical facilities in the county that lack backup power generation, many areas lacking cellphone service making individuals less likely to receive severe weather alerts, and most jurisdictions having limited to no funding to support mitigation efforts and projects. Additionally, the majority of development in southwest Alabama is occurring in Baldwin County, with Fairhope, Foley, Gulf Shores, Loxley, Robertsdale, and Spanish Fort experiencing greater than 20% population growth from 2010 to 2019, as well as two new commercial facilities and the development of a distribution center within the last five years.²⁴ Baldwin County's 2023 "Our Vision: A Citizen's Guide to Growth" noted that development in the County included 2,500 new multifamily units, 1.6 million new square feet of retail, 343,000 new square feet of office space, 2,000 new hotel rooms, and 416,000 new square feet of industrial space developed in the County since 2010. The guide also noted that growth challenges would include accelerated growth continuing to put pressure on roads and agricultural lands, rural landscape and agricultural industry impacts from subdivision development, development in low lying areas and upstream causing flood damage, water quality concerns associated with pesticide pollution and runoff, and increased traffic on major roadways changing the character of new roads and increasing congestion²⁵. The Baldwin County Strategic Plan (2021-2026) also identifies goals for improved stormwater retention, reduction in runoff, improved reporting on watershed quality, and expanding and improving roadways for efficient travel across the county.

2.4.2 DISASTER DAMAGE AND IMPACTS

Baldwin County sustained widespread damage from Hurricane Zeta, including downed trees and powerlines, structural damage from falling trees, damage to restaurants and businesses along the eastern portion of the US Highway 90 Causeway, significant wind damage, power outages, etc.²⁶ Baldwin County also experienced widespread damage from Hurricane Sally, including major flood damage to structures along the back bay waters, destroyed piers, heavily

²⁴ Southwest Alabama Regional Multi-Jurisdictional Hazard Mitigation Plan: Phase II. Available at: https://www.baldwincountyal.gov/docs/default-source/ema/southwest-alabama-regional-multi-jurisdictional-hazard-mitigation-plan-phase-ii9f303932-9f29-43b5-ab39-31f6079d7b1e.pdf?sfvrsn=e9e34157_3.

²⁵ Baldwin County. Our Vision: A Citizen's Guide to Growth. Available at: <https://static1.squarespace.com/static/61982cac87ea447f4c17d9ff/t/645c0e0dbba28a51f1e5e5e6/1683754514671/Drift+Document+100%25+%28BCC+Public+Hearing%29-Reduced.pdf>

²⁶ National Hurricane Center. Tropical Cyclone Report Hurricane Zeta. Available at: https://www.nhc.noaa.gov/data/tcr/AL282020_Zeta.pdf

damaged marinas, substantial damage to power infrastructure, pecan agricultural damage, and widespread wind and fallen tree structural damage.²⁷

The FEMA Public Assistance (FEMA-PA) Program provides immediate assistance to impacted jurisdictions in the aftermath of a disaster. For FEMA-PA work, Categories A and B cover work related to the immediate response of the disaster, while Categories C-G represent longer term recovery work. The Public Assistance program for FEMA Disaster No. 4563 provided \$162,206,594 for the County of Baldwin.²⁸

Table 50 shows the estimated FEMA-PA funds and unmet needs for each category of public assistance. In accordance with state calculations, the unmet needs assessment considers the future costs of the project including resilience and the increased cost of construction to estimate the Federal Share (90 percent) and the local share/unmet need (10 percent) more accurately.²⁹ Category F – Public Utilities and Category G – Recreational or Other show the highest remaining unmet need for permanent work covered under Categories C-G.

²⁷ AEMA. Southwest Alabama Regional Multi-Jurisdictional Hazard Mitigation Plan: Phase II. Available at : https://baldwincountyal.gov/docs/default-source/ema/southwest-alabama-regional-multi-jurisdictional-hazard-mitigation-plan-phase-ii9f303932-9f29-43b5-ab39-31f6079d7b1e.pdf?sfvrsn=e9e34157_3

²⁸ FEMA PA data was accessed April 2024.

²⁹ ADECA. CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>.

Table 50: Infrastructure Unmet Need

PA Category	Total PA Project Cost	Total PA Project Cost (+15% Resilience)	Total PA Project (+23.6% Increased Costs of Construction and Resilience)	Resilience and Increased Costs	Federal Share	Local Share
A – Debris Removal	\$132,892,687	\$132,892,687	\$132,892,686.81	N/A	\$119,603,418	\$13,289,269
B – Protective Measures	\$7,142,944	\$7,142,944	\$7,142,944	N/A	\$6,434,411	\$708,533
C – Roads and Bridges	\$4,012,433	\$4,614,298.31	\$4,935,292.97	\$922,859.66	\$3,611,190	\$401,243
D - Water Control Facilities	\$32,489	\$37,362.84	\$39,962.00	\$7,472.57	\$29,240	\$3,249
E – Public Buildings	\$2,142,351	\$2,463,703.98	\$2,635,092.09	\$492,740.80	\$1,928,116	\$214,235
F – Public Utilities	\$16,000,534	\$18,400,614.46	\$19,680,657.20	\$3,680,122.89	\$14,400,481	\$1,600,053
G – Recreational or Other	\$11,471,012	\$13,191,663.90	\$14,109,344.87	\$2,638,332.78	\$10,323,911	\$1,147,101
Z – State Management	\$5,875,827	\$6,757,200.89	\$7,227,267.04	\$1,351,440.18	\$5,875,827	\$0
Total	\$179,570,278	\$185,500,475	\$188,663,247	\$9,092,969	\$162,206,594	\$17,363,684

Source: FEMA PA (2020), using methodology of ADECA 2020 DR Action Plan

2.4.3 INFRASTRUCTURE UNMET NEEDS SURVEY

To understand the extent of infrastructure needs, Baldwin County distributed an Infrastructure Project Needs Survey to jurisdictions within the County and to County departments. The goal of the survey was to understand unmet recovery needs for infrastructure disaster recovery from Hurricanes Sally and Zeta. The survey asked for details on project title, description, location, budget, funding sources, timeline, and status of completion and environmental review. If a jurisdiction had more than one project, they submitted a response for each project. The survey was available online and distributed through email. It was open between April 29 and June 7, 2024 and elicited eight online responses and five emailed responses. These responses were used to inform the remaining need for infrastructure recovery. The full survey responses are available in Appendix 5.1.1.

The jurisdictions that responded to the survey and the number of their proposed projects are listed below (Table 51).

Table 51: Jurisdiction by Number of Project in Infrastructure Survey

Jurisdiction	Number of Proposed Projects
Baldwin County Emergency Management Agency	2
Baldwin County Highway	3
City of Bay Minette	1
City of Fairhope	1
City of Foley	8
City of Gulf Shores	1
City of Loxley	1
City of Orange Beach	3
City of Robertsdale	5
East Central Baldwin County Water, Sewer and Fire Protection Authority	3
Perdido Bay Water Sewer and Fire Protection District	1
Poarch Band of Creek Indians	0
Town of Magnolia Springs	1
Grand Total	30

Source: Baldwin County Infrastructure Survey (2024)

The survey shows that the top recovery project types related to disaster impacts were drainage, water and sewer improvements, and facilities (including a maintenance barn rebuild, historic building reconstruction, safe room construction, Emergency Operation Center expansion, and Emergency Management Agency warehouse construction). One project has been completed and the rest are in the design, planning, or not started phase. Of the 30 projects, 24 are projected to be completed prior to May 2026. An environmental review has been conducted for seven of the projects.

The total funding needed for all projects is \$75,214,586, with current funding at \$9,895,815. This reveals a funding gap and unmet need of \$65,318,770 in addition to the FEMA-PA calculation (Table 52).

Table 52: Types of Project and Funding Gap in Infrastructure Survey

Project Type	Number of Project Types	Budget for Projects	Current Funding Identified	Funding Gap
Debris Removal	1	\$1,302,197	-	\$1,302,197
Drainage	10	\$12,173,737	\$250,000	\$11,923,737
Facilities	5	\$6,807,868	\$4,945,815	\$562,053
Flood prevention	5	\$30,727,500	\$4,000,000	\$26,727,500
Road repairs/ improvement	3	\$9,950,000	\$700,000	\$9,250,000
Water and Sewer Improvements	6	\$14,253,284	-	\$14,253,284
Grand Total	30	\$75,214,586	\$9,895,815	\$65,318,770

Source: Baldwin County Infrastructure Survey (2024)

2.5 Economic Revitalization Unmet Need

This section provides an overview of economic revitalization unmet need in Baldwin County as a result of the DR-4563 and DR-4573 disasters. This section uses data from the U.S. Small Business Administration (SBA) on disaster loans for homes, businesses, and Economic Injury Disaster Loans (EIDL) to determine the economic impact to the County and the unmet economic needs in the County as a result of Hurricane Sally. This section also uses additional data sources including the U.S. Census to provide an overview of pre- and post-disaster economic conditions.

2.5.1 PRE-DISASTER ECONOMIC CONDITIONS

The Baldwin County unemployment rate had been decreasing prior to DR-4563 with an unemployment rate of 5.5% in 2017 and 3.9% in 2020 (Table 53).

Table 53: Pre-Disaster Unemployment Rate, Baldwin County

	2017	2020	2022
Population 16 years and over	163,759	176,852	189,569
In labor force	94,968	103,116	111,766
Percent in labor force	58.0%	58.3%	59.0%
Unemployment Rate	5.5%	3.9%	3.4%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017, 2020, 2022)

Prior to DR-4563, the median household income was \$52,562 and 32.6% of households had an income of \$34,999 or less (Table 54).

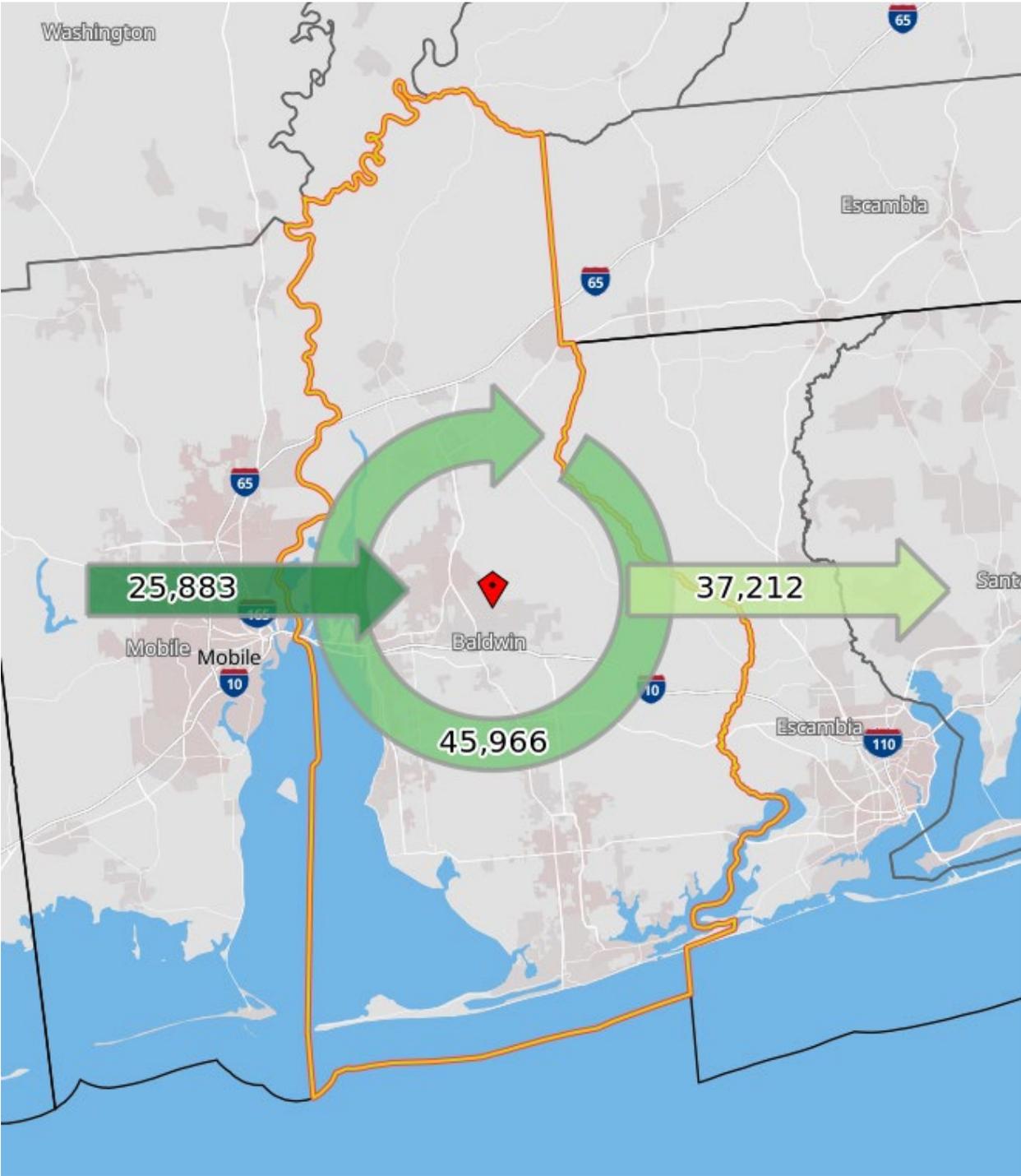
Table 54: Pre-Disaster Household Income, Baldwin County, 2017

Household Income	Number	Percent
Less than \$10,000	4,273	5.6%
\$10,000 to \$14,999	4,333	5.7%
\$15,000 to \$24,999	8,037	10.6%
\$25,000 to \$34,999	8,151	10.7%
\$35,000 to \$49,999	10,825	14.2%
\$50,000 to \$74,999	14,505	19.1%
\$75,000 to \$99,999	9,229	12.1%
\$100,000 to \$149,999	9,892	13.0%
\$150,000 to \$199,999	3,317	4.4%
\$200,000 or more	3,571	4.7%
Median household income (dollars)	52,562	(X)
Mean household income (dollars)	73,061	(X)

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017, 2020, 2022)

An inflow-outflow analysis of Baldwin County showed that in 2017, 45,966 County residents were employed and living in the County, 37,212 County residents traveled outside the County for employment, and 25,883 residents traveled into the County for employment (Table 55). Transportation disruptions from DR-4563 and DR-4573 may have impacted the large percentage of workforce traveling into and out of the County for employment.

Table 55: Inflow/Outflow Analysis Baldwin County 2017



Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017)

A few months prior to the storms, Baldwin County’s top employers were in education, health, retail, and aerospace manufacturing (Rohr Industries)³⁰ (Table 56).

Table 56: Top Pre-Disaster Employers in Baldwin County

Baldwin County March 2020 (700 – 4,500 Employees)	Baldwin County June 2020 (700 – 4,500 Employees)
Baldwin County Board of Education	Baldwin County Board of Education
Gulf Health Hospitals Inc.	Gulf Health Hospitals Inc.
Rohr Industries Inc	Public Alabama LLC
South Baldwin Regional Medical Center	Rohr Industries Inc.
Wal Mart Associates Inc	Wal Mart Associates Inc

Source: Southwest Alabama Regional Multi-Jurisdictional Hazard Mitigation Plan: Phase II

In 2017, the top industries in Baldwin County included accommodations and food service (18.4% of the workforce), retail trade (18.1%), and healthcare and social assistance (12.2%). In 2020, these were still the top industries by count and percent of workforce (Table 57). However, the number of workers in retail trade and accommodations and food services had decreased, while the number in healthcare and social assistance had increased. It should be noted that the high percentage of accommodations and food service workers may be related to the high number of workers involved with the tourism industry in Baldwin County.

Table 57: Pre-Disaster Industries, Baldwin County

	2017		2020	
	Count	Share	Count	Share
Agriculture, Forestry, Fishing and Hunting	858	1.2%	707	1.0%
Mining, Quarrying, and Oil and Gas Extraction	68	0.1%	81	0.1%
Utilities	688	1.0%	718	1.0%
Construction	4,195	5.8%	4,925	6.7%
Manufacturing	4,175	5.8%	3,847	5.3%
Wholesale Trade	2,159	3.0%	2,292	3.1%
Retail Trade	12,981	18.1%	12,335	16.9%
Transportation and Warehousing	1,512	2.1%	1,790	2.4%
Information	478	0.7%	480	0.7%
Finance and Insurance	1,658	2.3%	1,983	2.7%
Real Estate and Rental and Leasing	1,882	2.6%	1,985	2.7%
Professional, Scientific, and Technical Services	2,211	3.1%	2,533	3.5%
Management of Companies and Enterprises	365	0.5%	318	0.4%
Administration & Support, Waste Management and Remediation	3,413	4.8%	3,796	5.2%

³⁰ Baldwin County, Southwest Alabama Regional Multi-Jurisdictional Hazard Mitigation Plan: Phase II. Available at: https://baldwincountyal.gov/docs/default-source/ema/southwest-alabama-regional-multi-jurisdictional-hazard-mitigation-plan-phase-ii9f303932-9f29-43b5-ab39-31f6079d7b1e.pdf?sfvrsn=e9e34157_3

Educational Services	6,258	8.7%	6,705	9.2%
Health Care and Social Assistance	8,792	12.2%	9,339	12.8%
Arts, Entertainment, and Recreation	1,279	1.8%	1,534	2.1%
Accommodation and Food Services	13,198	18.4%	11,876	16.2%
Other Services (excluding Public Administration)	1,973	2.7%	1,939	2.6%
Public Administration	3,706	5.2%	4,018	5.5%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017, 2020)

In 2020, 34,420 workers in the County worked directly in travel-related employment – the most of any county in Alabama. Baldwin was the top visited county in the state with 8,037,849 visitors in 2021 and 8,311,418 visitors in 2022.³¹ The hospitality industry is especially vulnerable to disasters given the risks of physical damage to properties, ecological damage to tourism sites, interrupted wages to hospitality workers, and the economic risk of tourism loss during and following a disaster event.³²

Baldwin County also has the highest travel-related earning by County in the state. Table 58 shows that the travel related earnings were \$1,599,906,111 the year of DR-4563 and DR-4573 with sharp increases the following years.³³ However, given the timing of the disaster, the decline in travel and tourism was likely also impacted by the COVID pandemic.

Table 58: Travel- Related Earnings by Year, Baldwin County

2020	2021	2022	2021 – 2022 Rate of Growth
\$1,599,906,111	\$2,429,437,462	\$2,700,339,827	11.2%

Source: 2022 Alabama Tourism Economic Report

2.5.2 DISASTER DAMAGE AND IMPACTS

The Small Business Administration (SBA) offers Economic Injury Disaster Loans (EIDL) and Business Disaster Loans to aid businesses and private nonprofit organizations in rebuilding in the wake of disaster. Under Economic Injury Disaster Loans (EIDL), small businesses, small agricultural cooperatives, and private nonprofit organizations that are located in disaster declared areas and have substantial economic injury can receive up to \$2 million for assistance to meet financial obligations and operating expenses. Substantial economic injury means that the business is unable to meet its obligations and pay its ordinary and necessary operating expenses. The loan amount is based on economic injury and company’s financial needs regardless of property damage. EIDL funds are only available to small businesses that are

³¹ Alabama Tourism Department, 2022 Alabama Tourism Economic Report. Available at: https://tourism.alabama.gov/app/uploads/2022-Economic-Impact-Report_FINAL.pdf

³² Milan, Blesic, Janicevic, et al. 2019. Natural Disasters v. Hotel Industry Resilience: An Exploratory Study Amongst Hotel Managers from Europe. Available at: <https://ui.adsabs.harvard.edu/abs/2019OGeo...11...30I/abstract>

³³ Ibid.

unable to obtain credit elsewhere.³⁴ Under Business Physical Disaster Loans, businesses of any size and most private non-profit organizations that are located within disaster declared areas and have experienced damage can apply for up to \$2 million to cover disaster losses that are not fully covered by insurance³⁵. Because both EIDL and Business Disaster Loans are only available after insurance funds and other sources of credit, the below data is snapshot that may not demonstrate the full extent of damage to businesses.

The Small Business Administration (SBA) Business loan data (Table 60) on application status shows that Baldwin County had a total verified loss of approximately \$335 million for all businesses. In accordance with state methodology outlined in the 2020 Action Plan³⁶, the below estimate accounts for an additional fifteen percent (15 percent) resilience costs and calculates the county’s total estimated impact at \$385,255,901 (Table 59). According to the SBA business report, the SBA provided \$54,334,500 in total benefits to businesses. Therefore, the County’s remaining unmet need is \$330,921,401 (Table 62).

Table 59: Estimated Impact, Baldwin County

Category	Amount
Total Verified loss for all business (estimate)	\$335,005,131
Accounting for 15% resilience addition	\$50,250,770
Total estimated impact + resilience*	\$385,255,901

Source: SBA Disaster Loan Data (2020), *Following state methodology outlined in 2020 Approved Action Plan

Table 60: SBA Application by Status, Baldwin County

Geography	# of Applications	Percent
Total Business Applications	1,237	
Approved Applications	276	22%
Declined Applications	318	26%
Withdrawn Applications	458	37%
Duplicate	27	2%
No status	158	13%
Unmet need (Total – Approved – Duplicate – Blank)	776	63%

Source: SBA Disaster Loan Data (2020)

³⁴ US Small Business Administration, Economic Injury Disaster Loans. Available at : <https://www.sba.gov/funding-programs/disaster-assistance/economic-injury-disaster-loans>

³⁵ US Small Business Administration, Physical Damage Loans. Available at: <https://www.sba.gov/funding-programs/disaster-assistance/physical-damage-loans#id-business-physical-disaster>

³⁶ ADECA. CDBG – Disaster Recovery/2020 Action Plan. Available at: <https://adeca.alabama.gov/cdbg-disaster-recovery/2020-dr-action-plan/>.

Table 61: SBA Business Loan Data, Baldwin County

Count of Businesses with Verified Losses	Average Verified Loss	Estimated Additional Losses to Businesses
773	\$771,921	N/A

Source: SBA Disaster Loan Data (2020)

Table 62: Economic Unmet Need

	Count	Value
SBA approved applicants with Minor-Low loss	2	\$4,476
SBA approved applicants with Minor-High loss	9	\$50,088
SBA approved applicants with Major-Low loss	6	\$62,096
SBA approved applicants with Major-High loss	8	\$182,483
SBA approved applicants with Severe loss	218	\$310,065,984
SBA declined applicants with Minor-Low loss	2	\$2,300
SBA declined applicants with Minor-High loss	19	\$99,372
SBA declined applicants with Major-Low loss	24	\$283,421
SBA declined applicants with Major-High loss	18	\$402,170
SBA declined applicants with Severe loss	125	\$23,852,741
Total verified loss for all businesses (estimate)		\$335,005,131
15% resilience		\$50,250,770
Total Estimated Impact + Resilience		\$385,255,901
Total benefit (loan amount)		\$54,334,500
Total unmet business needs		\$330,921,401

Source: SBA Disaster Loan Data (2020), based on ADECA methodology

Since the 2020 disasters and the impacts of COVID-19, several initiatives have been implemented within Baldwin County to support workforce development, training, and strategic employment opportunities, with support from the Baldwin County Commission.

In 2022, the State legislature formed the South Baldwin Regional Workforce Development Authority. This Authority, established through Alabama SB 336 as passed on April 7, 2022³⁷, focuses on workforce development, entrepreneurship, advocacy, and collaborations between businesses, municipalities, and educational institutions in areas of the county south of Highway 32. The South Baldwin Regional Workforce Development Authority operates in partnership with the Chambers of Commerce and has established the Gateway Initiative to develop a 140-acre site in Foley dedicated to workforce training and education³⁸. The Gateway Initiative will provide a career development and educational campus, that will include housing and supportive services such as childcare and transportation, and partner with regional two- and four-year educational institutions in order to increase worker participation, increase skill sets, and develop greater seasonal and permanent employment opportunities. The program has identified \$6.8 million in funding to develop the site, including \$300,000 from Baldwin County through a grant received from the American Rescue Plan Act (ARPA).

In addition to the Gateway Initiative, two other notable economic revitalization initiatives have been supported by the Baldwin County Commission through ARPA funds – the Novelis, Inc. development, and the Magnolia Material Recovery Facility (MRF) at the Magnolia Landfill.

Novelis, an aluminum recycling and rolling manufacturer, is developing a new facility at the South Alabama Mega Site, a 3,000-acre site for business and industrial development in Bay Minette. Once operational in 2025, Novelis will provide up to 1,000 manufacturing jobs. Additionally, Novelis plans to partner with the Daphne Innovation + Science Complex, a technology and training center currently under development, to provide an advanced manufacturing and leadership program³⁹. To support the facility and industry development, the County awarded \$1,000,000 of ARPA funds and \$19,101,662.87 in general funds towards design and construction at the Mega Site.

The County has awarded \$4.6 million in ARPA funds to support the development of the MRF, which will help to establish sustainable waste management and provide up to 40 jobs at a sorting center. This recycling service and facility will also work in coordination with Novelis to provide materials, once both are operational. The MRF and adjacent solid waste landfill are managed by the recently formed Baldwin County Solid Waste Authority and will provide services throughout the county.

Workforce training and continuing education programs are also being provided by the Baldwin County Board of Education through the Baldwin Preparatory Academy, a career and technical school open to all youth in the school district. The school will open for the 2024-2025 academic year for up to 1,000 students and provide a range of technical and professional courses that build skills and prepare students for careers in specific industries. The Daphne Innovation + Science Complex, which is currently under construction, will also provide technical and professional opportunities for Baldwin residents.

³⁷ ALSB 336. *Baldwin Co., South Baldwin Regional Workforce Development Authority, established.* April 7, 2022. Available at: <https://legiscan.com/AL/text/SB336/2022>

³⁸ The Gateway Initiative. *Business Plan.* March 2024

³⁹ Baldwin Economic Development Alliance. Success Stories, Novelis. Available at: <https://baldwineda.com/why-baldwin/recent-success-stories/>

These additional programs and investments help to address the remaining unmet need in the county from Hurricanes Sally and Zeta through a combined \$31,501,663 in ARPA funding, local funding, and additional public and private sources. The ARPA and other funds reduce the total economic revitalization unmet need to \$299.4 million. While there is still a significant gap to be addressed based on the SBA data, the unmet need is expected to be addressed over time by the workforce and technical training services that will be available to support workforce growth and the employment opportunities provided by new industries coming to Baldwin County.

2.6 Unmet Needs Summary

Table 63 provides a detailed breakdown of the estimated losses, resilience costs, total estimated impact, funds available from other sources, and the remaining unmet needs across three sectors: housing, infrastructure, and economic revitalization.

The housing sector faces a substantial gap between the estimated impact and the funds available from other sources. With only approximately \$19.9 million available against a total impact of \$214.7 million, there remains an unmet need of \$194.8 million. This represents 31.7 percent of the total unmet needs across all sectors. The significant shortfall highlights a critical need for additional funding to address housing-related losses and to enhance resilience against future risks.

The infrastructure sector has the smallest percentage of unmet needs relative to the total, at 19.7 percent. The infrastructure sector faces an initial estimated loss and resilience costs of approximately \$293 million, with the available funds from other sources totaling \$172 million. This leaves an unmet need of \$120.9 million. Despite the funding available, addressing the remaining unmet needs is crucial to ensure the infrastructure's full recovery and future resilience.

The economic sector has the highest percentage of unmet needs, accounting for 48.7 percent of the total. The total estimated impact on the economy is \$385.3 million, with \$85.8 million available from other sources. This leaves an unmet need of \$299.4 million. The discrepancy between available funds and the total impact does indicate a shortfall in addressing economic recovery and resilience in the recovery to date, however, new employment, workforce initiatives and training programs are expected to begin addressing the gap in 2025.

Overall, the total unmet needs across all sectors amount to \$615,105,379. The housing sector, with 31.7 percent of the total unmet needs, requires significant attention, though it is surpassed by the economy sector, which has the largest gap at 48.7 percent. The infrastructure sector, while relatively better funded, still faces unmet needs amounting to 19.7 percent of the total. Addressing these gaps is crucial for comprehensive recovery and resilience building, necessitating a coordinated effort to secure additional resources and implement effective recovery strategies.

Table 63: Estimated Impact, Support and Unmet Needs

Sector	Housing	Infrastructure	Economy	Total
Amount of Initial Estimated Loss	\$186,715,223	\$254,784,864	\$335,005,131	\$776,505,218
15% Resilience Costs	\$28,007,283	\$38,217,730	\$50,250,770	\$116,475,783
Total Estimated Impact (Initial Impact + 15% Resilience)	\$214,722,507	\$293,002,594	\$385,255,901	\$892,981,001
Amount of Funds Available from Other Sources	\$19,937,050	\$172,102,409	\$85,836,163	\$277,875,622
Remaining Unmet Needs	\$194,785,457	\$120,900,185	\$299,419,738	\$615,105,379
Percent of Total Unmet Needs	31.7%	19.7%	48.7%	

2.7 Mitigation Needs Assessment

As part of determining recovery needs in the Local Recovery Plan, a mitigation needs assessment was conducted to identify the connections between impacts of current and future hazards, mitigation needs, and proposed mitigation activities. Mitigation under HUD and CDBG-DR is defined as *increasing resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.*

The Mitigation Needs Assessment in this plan, in addition to the disaster recovery-focused unmet needs assessment, provides an overview on state and local hazard mitigation plans, and descriptions of how mitigation measures may be incorporated into recovery-related construction projects.

2.7.1 STATE OF ALABAMA HAZARD MITIGATION PLAN

The risk assessment for the State of Alabama Mitigation Plan, hereafter referred to as the SHMP, delivers an empirical basis for developing a mitigation strategy for the state. The SHMP provides a detailed description of the process that was used to identify, assess, and prioritize Alabama’s natural hazard risks. The SHMP specifies hazard profiles and a detailed vulnerability assessment for the state’s 14 natural hazards.⁴⁰

⁴⁰ *Alabama State Hazard Mitigation Plan*. Available at: [state-of-alabama state-hazard-mitigation-plan-2018-update_final_07182018.pdf \(wordpress.com\)](https://www.state-of-alabama.gov/state-hazard-mitigation-plan-2018-update_final_07182018.pdf)

State Identified Hazards

1. Dam Failure
2. Drought
3. Earthquakes
4. Extreme Temperatures
5. Flooding (riverine, storm surge, flash floods)
6. Hail
7. High Winds (hurricanes, tornadoes, windstorms)
8. Landslides
9. Lightning
10. Sea Level Rise
11. Sinkholes and Land Subsidence
12. Tsunamis
13. Wildfires
14. Winter Storms

These hazards were then evaluated based on acquired data and risk assessments were performed on the most threatening hazards to incorporate updated data. Jurisdictions were then ranked based on their vulnerability and risk. The State identified four goals with subsets of objectives and actions supporting the State of Alabama's mitigation strategy.

State Mitigation Goals

- Comprehensive enhancements to the statewide mitigation system.
 - Improve local and state capability to research natural hazards by providing technical assistance to local public officials.
 - Improve the statewide availability of risk information (GIS, etc.).
 - Ensure that State, county, and local officials have the most current data regarding Repetitive Loss and Severe Repetitive Loss properties.
- Reducing the State of Alabama's vulnerability and increasing their resilience to hazards to protect people, property, and natural resources.
 - Strengthen state building codes to require the latest construction techniques and materials that reduce the effects of natural hazards on buildings and infrastructure.
 - Encourage local governments to adopt and enforce more stringent building codes.

- Improve the state’s ability to prepare and respond to disasters.
- Reduce impact of hazard events on state departmental functions.
- Promote hazard mitigation policies that reduce risk to people and property.
- Public awareness and understanding of hazard risk and understanding.
 - Publicize and encourage adoption of appropriate hazard mitigation actions.
 - Educate public of State Plan identified hazards.
- Expand and promote coordination and communication with other government agencies, local governments, and other relevant organizations.
 - Establish lasting partnerships that progress hazard mitigation in the state.
 - Promote and integrate hazard mitigation into other organizational activities.
 - Improve State and local government capability to administer pre- and post-disaster mitigation programs and long-term recovery programs.

2.7.2 SOUTHWEST ALABAMA REGIONAL MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: PHASE II

The Southwest Alabama Regional Multi-Jurisdictional Hazard Mitigation Plan: Phase II is a hazard mitigation plan for Baldwin, Escambia, and Mobile counties with the purpose of recognizing and evaluating all prioritized hazards that may affect the region, as well as developing a regional mitigation strategy. This regional mitigation plan includes a risk assessment providing profiles for the 11 hazards identified and a jurisdictional vulnerability summary.⁴¹

Regional Identified Hazards

1. Dam/Levee Failure
2. Drought
3. Earthquakes
4. Flooding
5. Hurricane Force Winds
6. Tornadoes
7. Severe Storms

⁴¹ *Southwest Alabama Regional Multi-Jurisdictional Hazard Mitigation Plan: Phase II*. Available at: southwest-alabama-regional-multi-jurisdictional-hazard-mitigation-plan-phase-ii9f303932-9f29-43b5-ab39-31f6079d7b1e.pdf (baldwincountyal.gov)

8. Landslides
9. Tsunamis
10. Wildfires
11. Winter Storms

Through the risk assessment, the region developed six broad goal categories for the mitigation strategy.

Regional Mitigation Goals (AEMA Division A)

- Prevention
 - Land use planning and zoning administration (All Hazards, primarily Flooding)
 - Building code enforcement program (Flooding, High Winds)
 - Open space preservation (Flooding)
 - Floodplain management regulations (Flooding)
 - Stormwater management regulations (Flooding)
 - National Flood Insurance Program (NFIP) participation (Flooding)
 - Capital improvements planning (All Hazards)
- Property Protection
 - Flood prone property acquisition (Flooding)
 - Flood prone structure relocation (Flooding)
 - Flood prone structure elevation (Flooding)
 - Critical facilities and other structure retrofitting (All Hazards)
 - Natural Resource Protection
 - Floodplain protection (Flooding)
 - Watershed management (Flooding)
 - Riparian buffers (Flooding)
 - Forest and vegetation management (Flooding, Wildfire)
 - Conservation easements (Flooding, Land Subsidence)
- Structural Mitigation
 - Reservoirs (Flooding)
 - Levees and dams (Flooding)
 - Stormwater diversion (Flooding)
 - Retention and detention structures (Flooding)
 - Safe rooms and shelters (High Winds, Extreme Temperatures)
- Emergency Services
 - Warning alert systems (All Hazards)
 - Continuity of operations (All Hazards)
 - Evacuation routes (All Hazards)
 - Emergency responder training (All Hazards)
 - Provision of alternative power (All Hazards)
 - Debris removal (All Hazards)
- Public Awareness and Education
 - Information dissemination (e.g., GIS, hazard resource websites) (All Hazards)
 - Public workshops (All Hazards)
 - Education programs (All Hazards)

- Real estate disclosures (Dam Failure, Flooding, Technological Hazards)

2.7.3 BALDWIN COUNTY MULTI-HAZARD MITIGATION PLAN

The Baldwin County, Alabama Multi-Hazard Mitigation Plan is a multi-jurisdictional plan with the purpose of recognizing and evaluating all prioritized hazards that may affect the county, as well as developing a mitigation strategy for the unincorporated areas and jurisdictions listed below⁴²:

- City of Bay Minette
- City of Daphne
- Town of Elberta
- City of Fairhope
- City of Foley
- City of Gulf Shores
- Town of Loxley
- Town of Magnolia Springs
- City of Orange Beach
- Town of Perdido Beach
- City of Robertsdale
- Town of Silverhill
- City of Spanish Fort
- Town of Summerdale
- Baldwin

The Baldwin County Multi-Hazard Mitigation Plan includes a risk assessment with hazard profiles for the 13 identified hazards and jurisdictional vulnerability.

Baldwin County Identified Hazards

1. Hurricanes
2. Flooding
3. Severe Storms
4. Tornadoes

⁴² 2015 Baldwin County Multi-Hazard Mitigation Plan. Available at: [baldwin-complete.pdf \(alabama.gov\)](#)

5. Wildfires
6. Drought/Heatwaves
7. Winter Storms/Freezes
8. Earthquakes
9. Landslides
10. Dam/Levee Failures
11. Sinkholes (Land Subsidence)
12. Tsunamis
13. Manmade/Technological

Baldwin County developed five broad categories for the mitigation strategy from the county's risk assessment.

Baldwin County Mitigation Goals

- Prevention
 - Minimize risks of loss due to natural and man-made hazards through managing land use and development.
- Property Protection
 - Protect structures from the damaging effects of natural and man-made hazards for the safety of their occupants and preservation of property.
- Public Education
 - Educate and notify the public about the risks of hazards and the methods available to reduce threats to life and property.
- Natural Resources Protection
 - Restoration and preservation of the natural environment to promote and enhance sustainable community development.
- Structural Projects
 - Apply engineered structural modifications to natural systems and public infrastructure to reduce the impacts of hazards. Modifications are to be feasible, cost effective, and environmentally suitable.

2.7.4 GREATEST RISK HAZARDS

Baldwin County is susceptible to a variety of hazard events; however, through state and local mitigation plan analysis, ADECA's 2020 Action Plan identified the six hazards that pose the greatest threat to lives and property. The greatest risk hazards are: (1) hurricane force winds, (2) hurricane storm surge, (3) tornadoes, (4) coastal flooding, (5) 100-year flooding, and (6)

severe storms⁴³. The six hazards can be separated into two categories: flooding and high wind. Baldwin County’s 2015 Multi-Hazard Mitigation plan identified the six listed hazards, generalized into four hazards, as highest risk in terms of loss estimates—both historical and potential.

Table 43. Top Hazard Threats Identified

Hazard	Probability	Mitigation Projects Identified
Hurricane Force Winds	High	<ul style="list-style-type: none"> • Retrofitting homes and buildings to protect most vulnerable components.
Hurricane Storm Surge	High	<ul style="list-style-type: none"> • Home elevations • Permanently securing manufactured homes to a foundation. • Storm shutter installation.
Costal Flooding & Sea Level Rise	Low	<ul style="list-style-type: none"> • Home elevation • Home relocation
Tornadoes	Medium High	<ul style="list-style-type: none"> • Retrofitting homes and business to include safe rooms
100-yr Flooding	High	<ul style="list-style-type: none"> • Stormwater management projects • Home relocation • Home elevation • Relocating utilities above base flood elevation
Severe Storms	Medium High	<ul style="list-style-type: none"> • Retrofitting public and private buildings to increase structural capacity. • Relocation projects

2.7.4.1 Hurricane Force Winds and Storm Surge

Hurricanes are the greatest and most damaging threat to Baldwin County. There have been 22 declared hurricane events since 1969 in Baldwin County, of which 14 of the 22 declarations occurred between 2005-2020.

In September 2020, hurricane force winds from Hurricane Sally generated widespread damage to trees, powerlines, and buildings across Baldwin County—resulting in over 2 million cubic yards of vegetative and construction debris collected from county roads, rights-of-way and public property. Hurricane Zeta’s wind impacted Baldwin County in October of 2020, while the county was recovering from Sally, causing additional damage to trees and powerlines across

⁴³ ADECA 2022 DRGR Action Plan. Available at: <https://adeca.alabama.gov/wp-content/uploads/Alabama-DRGR-Public-Action-Plan-Approved-1.12.23.pdf>

the county. The 2020 storms damage was not limited to wind events, the storms also produced widespread storm surge inundation and flood damage across the coastal areas of the county.⁴⁴

2.7.4.2 Sea-Level Rise & Coastal Flooding

Coastal flooding typically occurs when there are significant storm events pushing water onto land from an adjacent body of water. Since 2010, there have been two coastal flooding events.⁴⁵

2.7.4.3 Tornadoes

Tornado occurrence cannot be predicted, but past events can define an area susceptible to activity. Baldwin County faces a high probability for tornado activity, NOAA's storm database reports 26 tornado events in the county since 2016—four of these events caused property damage.⁴⁶

2.7.4.4 100-yr Flooding

The 100-yr flooding threat is most likely to occur along river tributaries and the south shore of Baldwin County. From 1996-2019, FEMA reported 72 flooding events in Baldwin County.⁴⁷

2.7.4.5 Severe Storms

Baldwin County has a significant amount of land area in medium to medium-high severe storm threat area. Since 2010, over 60 severe storm events have been reported in Baldwin County, three of which were declared emergencies or disasters by FEMA.⁴⁸

2.7.5 INDISPENSABLE SERVICES

Indispensable Services are services that are vital to human health, safety and economic security that enable the continuous operation of critical government and business functions. Baldwin County inventoried 191 critical facilities deemed essential to the health and welfare of residents. Indispensable Services can be grouped by FEMA's seven lifeline classifications:

- Safety and Security
- Food, Hydration, Shelter
- Health and Medical
- Energy
- Communications

⁴⁴ FEMA. FEMA, State approve \$29.6 million for Baldwin County debris removal after Hurricane Sally. Available at: <https://www.fema.gov/es/node/620961>.

⁴⁵ NOAA National Centers for Environmental Information. Storm Events Database. Available at: <https://www.ncdc.noaa.gov/stormevents/choosedates.jsp?statefips=1%2CALABAMA>.

⁴⁶ NOAA National Centers for Environmental Information. Storm Events Database. Available at: <https://www.ncdc.noaa.gov/stormevents/choosedates.jsp?statefips=1%2CALABAMA>.

⁴⁷ FEMA. Historical Flood Risk and Costs. Available at: <https://www.fema.gov/data-visualization/historical-flood-risk-and-costs>.

⁴⁸ FEMA. Disaster Declarations for States and Counties. Available at: <https://www.fema.gov/data-visualization/disaster-declarations-states-and-counties>.

- Transportation
- Hazardous Materials

Table 44. Baldwin County Critical Facilities

Category	Lifeline	System	Number of Facilities
Essential Facilities	Health and Medical	Hospitals	4
	Health and Medical	Elderly Care	24
	Safety and Security	Fire Stations	24
	Safety and Security	Police Stations	16
	Food, Hydration, Shelter	Schools	62
	Communication	Emergency Operations Center	1
	Transportation	Transportation	Port Facilities
	Transportation	Airport Facilities	5
Utilities	Food, Hydration, Shelter	Potable Water	1
	Hazardous Materials	Waste Water	19
	Energy	Natural Gas	1
	Energy	Electrical Power	1
	Communication	TV/Radio Stations	29

Source: *Baldwin County Multi-Hazard Mitigation Plan, 2015*

Hurricanes, severe storms, and flooding pose the greatest threat to the facilities that provide indispensable services. Hurricanes Sally and Zeta exposed the vulnerabilities to Baldwin County’s wastewater facilities and electrical powerlines and substations, with widespread power loss and wastewater overflow resulting from the events.

Additionally, facilities with high population densities, such as assisted living and hospitals, are most vulnerable to hurricanes, tornadoes, and severe storms due to potential evacuation difficulties. Backup power generation has been integrated as a mitigation measure into some critical facilities, but the county identified that backup power generation integration at critical facilities remains a priority to reduce vulnerability to all hazards.

2.7.6 Conclusion

The mitigation needs assessment considered the 14 natural hazards in the State's mitigation plan, the 11 natural hazards profiled in the regional plan, and the 13 natural and man-made hazards in the County's plan. The assessment prioritized the six natural hazards that pose the greatest risk to Baldwin County due to historical frequency, magnitude, and vulnerability—hurricane force winds, hurricane storm surge, sea-level rise and coastal flooding, tornadoes, and 100-yr flooding. Mitigation efforts would be best directed toward addressing the impacts of these flood and wind events, and enhancing resiliency of critical facilities across the county.

DRAFT

3 General Requirements

3.1 Public Participation

Seeking input from stakeholders and communities is a requirement of the LRPP process and a critical component of any recovery planning effort. To receive an authorization to use funds or to be eligible to compete in the funding competitions, the Local Recovery Plan (LRP) must include extensive outreach, engagement and consultation with local government partners, non-governmental organizations, the private sector, tribal governments, and the general public.

3.1.1 OUTREACH AND ENGAGEMENT

Participating governments are responsible for informing and engaging stakeholders on disaster impacts and the uses and parameters of CDBG-DR funds; pursuing environmental justice by encouraging participation from vulnerable and historically underserved populations; and ensuring that proposed programs align with the community's needs as well as State recovery priorities.

To meet and exceed these requirements and to guide and support the development of this Local Recovery Plan, Baldwin County implemented a robust, multi-pronged outreach and engagement strategy to:

- Collect data from stakeholders about unmet housing, infrastructure, economic development, and mitigation needs,
- Identify potential activities and programs that address remaining unmet needs, and
- Ensure that the planning process and plan was as comprehensive and inclusive as possible.

The County utilized a variety of methods to inform local officials and the public about the purpose and goals of local recovery planning, engage stakeholders in discussions about recovery and community development priorities, and gather feedback about potential recovery programs and activities.

The County presented critical information about storm impacts, the purpose of the LRP, and CDBG-DR funds through traditional public notices and press releases, the County's LRP webpage (<https://baldwincountyal.gov/departments/grants/cdbg-dr>), stakeholder consultation, charrettes, public meetings, and the required public comment period.

During the outreach and engagement process, the County engaged with six County departments, twelve local governments, ten local organizations that advocate for underserved communities, and welcomed 60 attendees over the course of a planning charrette and three public meetings.

Baldwin County will continue to work to keep the media, community groups, local leaders, and key stakeholders informed with timely and accessible updates about local recovery planning and implementation.

The following sections provide a summary of the County's outreach and engagement efforts with local stakeholders and stakeholder groups throughout the development of the LRP.

3.1.1.1 Limited English Proficiency and Four-Factor Analysis

Baldwin County intends to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the County’s recovery programs.

To determine language needs, the County conducted a four-factor analysis that balances the following factors:

- The number or proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which LEP persons come into contact with the program;
- The nature and importance of the program, activity, or service provided by the program; and
- The resources available and costs to the recipient.

Factor 1: Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

The table below provides information about the distribution of LEP populations. If the analysis determines that a population exceeding 1,000 LEP persons exists within the service area, the entity must develop a Language Access Plan. From the table below, Baldwin County meets the 1,000 LEP persons threshold for Spanish. Three percent of the total population in Baldwin County speaks Spanish as their primary language.

Table 64: LEP Populations, Baldwin County

Primary Language Spoken	Total	Percent	Speak English less than "very well"
English	210,501	95.1%	
Spanish	6,474	2.9%	2,760
Other Indo-European languages	1,709	0.8%	571
French, Haitian, or Cajun	762	0.3%	199
Russian, Polish, or other Slavic languages	508	0.2%	64
Other Asian and Pacific Island languages	378	0.2%	293
German or other West Germanic languages	278	0.1%	23
Chinese (incl. Mandarin, Cantonese)	184	0.1%	125
Korean	152	0.1%	117
Other and unspecified languages	143	0.1%	0
Vietnamese	120	0.1%	61
Tagalog (incl. Filipino)	90	0.04%	0
Arabic	17	0.01%	7

Source: U.S. Census Bureau, 2022 American Community Survey 5-Year Estimates

Table 65: HUD Translation Threshold Recommendations

Size of language group	Recommended provision of written language assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required

Factor 2: The Frequency with which LEP Persons Come into Contact with the Program

Frequency of contact with LEP persons depends on the specific program or geographic area being served.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program

Determine whether the project will provide critical improvements that serve low- and moderate-income people with a significant number of LEP persons or a primary focus on LEP persons.

Factor 4: The Resources Available and Costs to the Recipient

The last factor to consider is the cost of providing various services balanced against the resources available, such as activities that require one-on-one contact with clients may require oral and written translation.

Overall Program Factor Assessment

Housing: High

Factor	LEP Assessment - Housing
Factor 2: The Frequency with which LEP Persons Come into Contact with the Program	High
Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program	High
Factor 4: The Resources Available and Costs to the Recipient	Medium

Housing programs provide direct benefits to individuals and households, involve frequent outreach and marketing, and ongoing communication. The housing activities proposed in this Plan will have high community engagement provided by the County and partners. This is a

county-wide program, so translating critical program documents will provide greater opportunity for LEP persons to be involved and understand the services being provided.

Infrastructure: Medium

Factor	LEP Assessment - Infrastructure
Factor 2: The Frequency with which LEP Persons Come into Contact with the Program	Low
Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program	Medium
Factor 4: The Resources Available and Costs to the Recipient	Low

Infrastructure programs are primarily public works projects that provide area benefits. The program proposed in this Plan will be led by the County, with implementation by County departments and municipalities. Engagements with LEP persons will depend on the geographic area being served by the project. The County will consider the location and community impacts of projects and determine the need for translation on an as needed basis to ensure communications on any important updates, such as service disruptions, detours, or impacts to the community are made accessible.

The County will consider the overall need, cost, and time required for program information to be provided in additional languages based on the overall program assessments. A Language Access Plan will be developed as part of the County’s CDBG-DR policies and procedures, and specific requirements related to translation needs will be described in the policies for each program.

3.1.2 CONSULTATION

The LRPP requires that participating governments consult with local stakeholders and representatives using a variety of accessible and inclusive methods, including at least one planning charrette and two public meetings.

In the development of this plan, Baldwin County consulted with County departments, local governments, organizations, and entities that advocate for or serve members of vulnerable populations and underserved communities, and the general public.

Recognizing the complex and opaque mechanics of CDBG-DR allocations and program implementation, the County created straightforward and accessible communications materials, including print communications, talking points, one-pagers, and website content to help educate and orient stakeholders on how recovery dollars might be utilized to support the County’s recovery from the 2020 hurricanes and bolster local resilience for future climate impacts.

Using these materials, the County engaged stakeholders through a variety of methods, including surveys, individual and small group interviews, discussion groups, planning charrettes, public meetings, and public comment solicitation.

3.1.2.1 Engagement with Non-Governmental Organizations and Private Sector

Among the first outreach and engagement activities conducted by the County was a series of stakeholder interviews with non-governmental organizations (NGOs) and private sector entities

that represent and/or serve vulnerable, underserved, and historically disadvantaged communities in Baldwin County.

To ensure that these interviews yielded comprehensive and consistent data, the County developed an interview guide that focused on the populations, disaster impacts, and unmet needs in the communities served by the interviewed organization; the organization’s role during and after the disaster; and the organization’s recovery and mitigation priorities.

The County interviewed representatives from 10 non-profit and private sector organizations regarding unmet needs resulting from Hurricanes Sally and Zeta. Organizations that participated in stakeholder interviews are listed below:

Organization Name	Organization Description	Populations Represented or Served
Baldwin County Council on Aging	Non-profit advocacy and service organization serving Baldwin County seniors.	Seniors, people with disabilities
Baldwin County United Way	Non-profit fundraising and volunteer organization providing support to Baldwin County human service agencies.	Broad range of vulnerable and historically underserved communities
Baldwin County Economic Development Alliance	Partnership of local public and private professionals focused on growing a diverse industry base, job creation, and advocacy for the County’s economy and workforce.	Business owners, industry, local workforce, consumers, general population
Baldwin Education Coalition	Nonprofit organization supporting and advocating for educational institutions, educators, and students in Baldwin County.	Schools/school systems, educators, children/students, and families.
Baldwin Realtors Association / Baldwin Realtors Foundation	Local association for 3,000+ realtors in Baldwin County and surrounding areas. Researches, advocates, and creates support programming for homebuyers and renters in the County.	Homebuyers and renters of all income levels, workforce and low/mod-income residents
Family Promise	Homelessness prevention and housing stabilization non-profit providing case management, rental and utility assistance, landlord mediation, and transportation support to households in danger of losing housing.	Families/households in danger of homelessness, low-income households, families, children.
Gateway Initiative	Workforce development and pro-business advocacy organization focused on community betterment, entrepreneurship, advocacy, and business innovation.	Business owners, industry, local workforce, consumers, general population
Gulf Shores Orange Beach Tourism	Official destination marketing organization for Alabama beaches; arm of the South Baldwin Chamber of commerce; advocacy organization for local economy, business owners, and workforce.	Business owners, industry, local workforce, consumers, tourists/visitors, general population
HICA	Birmingham, Alabama-based community development and advocacy organization that champions economic equality, civic	Latino households, families, businesses, communities, and workers, across Alabama

	engagement, and social justice for Latino families in Alabama.	
VOA Southeast	National faith-based non-profit providing services and aid in affordable housing, shelter, food security, healthcare, veteran services, childcare, and more.	Under/under-housed individuals and families, low-income households, seniors, people with disabilities, veterans, disaster victims, children

3.1.2.2 Engagement with Baldwin County Departments and Public Entities

During the LRP process, the planning team solicited input via small group interviews and discussions with the following Baldwin County departments and public agencies:

- Baldwin County Building Department
- Baldwin County Communication and Information Systems Dept.
- Baldwin County Emergency Management Agency
- Bay Minette Housing Authority

The planning team presented information on the LRP, CDBG-DR funds, and local unmet needs, and facilitated discussions among departments about recovery priorities and potential activities.

The input received was utilized in developing disaster impact assessments, unmet and mitigation needs assessments, and the proposed budget allocations for the LRP.

3.1.2.3 Engagement with Local Municipalities

In April 2024 Baldwin County sent surveys to 24 local municipal and tribal governments and public utility providers to assess local infrastructure priorities and invite suggestions for potential recovery projects. The County received responses from eight local governments, two public utility districts, and one tribal government.

The input received was utilized in developing disaster impact assessments, unmet and mitigation needs assessments, and the proposed budget allocations for the LRP.

The County invited local municipalities to attend and participate in all public charrettes and public meetings conducted during the planning process (see Public Hearings section for additional information).

3.1.2.4 Engagement with Tribal Nations

The Poarch Band of Creek Indians are the only federally recognized tribe in the state of Alabama. The tribal government, reservation, and communities are east of Baldwin County, in Escambia County. Baldwin County engaged representatives from the Poarch Band of Creek Indians regarding disaster impacts and unmet needs from Hurricanes Sally and Zeta via emails, phone calls, and invitations to interviews, discussions, and public meetings. The tribe reported no unmet needs on tribal land.

3.1.3 PLANNING CHARRETTE

Baldwin County hosted a planning charrette for key stakeholders to provide an understanding of CDBG-DR requirements and the program decision making process, and to engage with community members about community needs and priorities for recovery. The planning charrette was held on June 5, 2024 in Robertsdale. Approximately 40 individuals representing 20 local municipalities or entities attended the charrette. Attendees were presented with program design options that would address the needs and priorities highlighted in prior outreach and engagement efforts. Charrette attendees were given opportunities to provide input about the recovery goals and priorities of their communities via a live survey and question and answer segments during the charrette, as well as opportunity to provide written responses to questions that were collected at the conclusion of the charrette.

3.1.4 PUBLIC HEARINGS

During development of the LRP and prior to publishing the draft plan for public comment, Baldwin County hosted two public meetings for municipal and tribal representatives to introduce the Local Recovery Planning Program, provide information about CDBG-DR funds, and assess interest in program participation among local governments. Both meetings were held on February 15, 2024, with one taking place in Bay Minette and the other in Foley. Approximately 20 individuals participated in the public meetings, with 12 local municipalities or entities represented.

The County will hold two additional public meetings in the same locations during the 30-day public comment period to present the full draft plan and gather input from stakeholders.

The date, exact location, method, and number of comments received at each meeting are listed in the table below.

Table 66: Baldwin County Hosted Public Hearings

Date	Location	Method	Comments Received
2/15/2024	Baldwin County Commission Chambers at 322 Courthouse Square, Bay Minette	In Person	No
2/15/2024	Large Meeting Hall at 201 East Section Avenue, Foley	In Person	No
7/31/2024	Large Meeting Hall at 201 East Section Avenue, Foley	In Person	TBD*
8/7/2024	Baldwin County Commission Chambers at 322 Courthouse Square, Bay Minette	In Person	TBD*

**Any comments received during the public comment period and from the 7/31 and 8/7 meetings will be incorporated into the final Local Recovery Plan.*

3.1.5 PUBLIC COMMENT

Baldwin County continues to solicit input on the proposed use of CDBG-DR funds from community stakeholders and organizations. The County will hold a 30-day public comment period between mid-July and mid-August for the public to review and provide feedback on the draft Local Recovery Plan.

The draft will be published on the Baldwin County CDBG-DR website⁴⁹ along with information about how to submit feedback during the 30-day public comment period. The County will issue a public notice and announcements across communications channels to alert the public that the draft Plan is available for review and comment.

The County will review each comment submitted during the public comment period. Any changes made to the LRP in response to public comments will be included in the final version of the LRP, in addition to a summary of the comments received and the County's response to each.

3.2 Complaints

Baldwin County has adopted the following complaint process, as identified in the Citizen Participation Plan:

- Citizens and program participants may submit written comments or complaints to the Baldwin County Commission when a perceived wrong has occurred related to the CDBG-DR Local Recovery Plan allocation and its programs. Comments and complaints may be submitted to the Commission via email at BCCGrants@baldwincountyal.gov or in writing to the Baldwin County Commission, or by contacting the Department of Grants.
- When a comment or complaint is received, the Baldwin County Commission will review and provide a written response to the commenter within 15 working days of the date of receipt.
 - If the Commission is unable to address the comment or complaint within 15 working days, then the Commission will document the reason for the additional time needed.

In responding to comments or complaints, the Commission shall thoroughly review all files and records and consistently apply rules and regulations governing their CDBG-DR program. The Baldwin County Commission, at its discretion, may obtain any further information by request, investigation or research to insure a fair and full review of the complaint. In making a determination about the complaint, the Commission shall inform the commenter about the factual and legal basis for the decision and relief, if any, to which the commenter is entitled and how this is to be achieved.

The Baldwin County Grant Administrator shall maintain individual files for all complaints and comments received. Contents shall include complete records, correspondence, notices, minutes, references, and other material related to receipt, review, decision and final outcome and response. These files shall be available for review by the State, HUD, or other Federal officials and shall be introduced as permanent records for any court proceedings.

Nothing under this procedure shall in any way preclude or limit a person from seeking judicial review of his/her complaint after exhausting all administrative remedies available under this procedure.

⁴⁹ Baldwin County Community Development Block Grant – Disaster Recovery Website. Baldwin County Department of Grants. Available at: <https://baldwincountyal.gov/departments/grants/cdbg-dr>

Citizens and program participants may also contact ADECA or HUD to submit comments and complaints related to Baldwin County's CDBG-DR Local Recovery Plan allocation and its programs by submitting in writing to:

ADECA:

Alabama Department of Economic and Community Affairs (ADECA)
Community and Economic Development Division
401 Adams Avenue, Room 500; Post Office Box 5690
Montgomery, Alabama 36103-5690

HUD:

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
The Plaza, 417 20th Street North, Suite 700
Birmingham, Alabama 35203

Furthermore, any complaints related to fair housing, or acquisition and relocation shall be treated in accordance with the DHUD 1378 Handbook and the Fair Housing Equal Opportunity Handbook. As a part of the County's grievance procedure, it should be pointed out that appealable actions on acquisition and/or relocation matters should be referred to the ADECA for review prior to an oral or written appeal to HUD, if the individual or business is dissatisfied with the County's ruling. In addition, complaints related to equal opportunity and civil rights shall be forwarded directly to the Fair Housing and Equal Opportunity Division of HUD, Field Office in Birmingham.

Complaints regarding fraud, waste, and abuse will be forwarded to the HUD OIG Fraud Hotline at 1-800-347-3735 or via email at hotline@hudoig.gov.

3.3 Amendments

Substantial Amendment: A change to this Local Recovery Plan (Plan) is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria, or
- The addition or deletion of an activity, or
- Proposes a reduction in the overall benefit requirements, or
- The allocation or reallocation of greater than 10% of the budget allocation.

When Baldwin County pursues the substantial amendment process, the amendment will be posted at baldwincountyal.gov/departments/grants/cdbg-dr for a 30-day public comment period. The amendment will be posted in adherence with Baldwin County's Citizen Participation Plan, as well as LEP and accessibility requirements. The 30-day public comment period will afford citizens and interested parties an opportunity to review and comment on the proposed amendment. A public hearing will be held for the County to present the proposed changes to the Local Recovery Plan, with notice published 14 days prior. Any updates or changes to the plan in response to public comments and the public hearing will be clearly identified in the plan. The County will review and respond to all public comments received and submit to ADECA for

approval. A summary of the public comments received regarding the amendment, and the County's response to each, will be included in the amendment's finalization process.

Non-Substantial Amendment: A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan. An amendment to the plan that does not meet any of the criteria noted in the above Substantial Amendment section will be considered a non-substantial amendment.

The County will notify ADECA five (5) business days before the change is effective.

Non-substantial amendments may be made at the discretion of the County and will not require a public comment period. Notice of a non-substantial amendment will be provided through the County's disaster recovery website. The County may also publish additional public notices and conduct additional hearings (or provide public comment periods) to meet program requirements, if unique circumstances arise (e.g., a natural disaster, pandemic, emergency allocation of funds, or another situation that is not already accounted for). The County will notify ADECA when it makes any amendment to the plan that is not substantial and will publish the amendment on the public website.

All amendments will be numbered sequentially and posted to the website into one final plan.

3.4 Displacement of Persons and Other Entities

If any CDBG-DR programs administered by the County require the displacement of persons or other entities, the County assures that it will follow the requirements stated in the [State of Alabama Displacement Plan](#). Additionally, if any CDBG-DR programs require individuals or entities to be displaced and require relocation assistance, the County will adopt ADECA's Uniform Relocation Assistance Guide and Residential Anti Displacement and Relocation Assistance Plan (RARAP).

3.5 Protection of People and Property

3.5.1 FLOOD INSURANCE REQUIREMENTS

Residential

Residential properties located within the special flood hazard area (100-year floodplain) that receive CDBG-DR assistance for repairs, improvements, or acquisition shall purchase and maintain flood insurance for the assisted facility in perpetuity. Flood insurance is not required for HUD-assisted leasing of a building or structure provided that the assistance is not used for repairs, improvements, and acquisition.

Non-Residential

Non-residential facilities located within the special flood hazard area (100-year floodplain) that receive CDBG-DR assistance for repairs, improvements, or acquisition shall purchase and maintain flood insurance for the assisted facility in perpetuity. Flood insurance is not required for HUD-assisted leasing of a building or structure provided that the assistance is not used for repairs, improvements, and acquisition.

Non-residential facilities that receive CDBG-DR assistance to purchase equipment, inventory, or other items considered “contents” under a flood insurance policy that are stored at a facility located within the special flood hazard area shall also purchase and maintain flood insurance.

3.5.2 CONSTRUCTION STANDARDS

The County will abide by the construction standards set in II.B.2. Construction Standards in [87 FR 31647](#) for any programs that require construction work. Additionally, the County will ensure that all construction work conducted on any CDBG-DR programs will be in compliance with applicable state and local building codes and meet all applicable Green Building certification standards.

3.5.3 PREPAREDNESS, MITIGATION AND RESILIENCY

Resilience is defined as a community’s ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks. To integrate hazard mitigation and resilience planning with recovery efforts, Baldwin County will promote sound, sustainable, long-term recovery planning informed by post-disaster evaluation of hazard risk and the creation of resilience performance metrics. The intent of this Plan is to outline strategies that reduce risks and vulnerabilities of people in hazard-prone areas through current technology, reduce the potential impact of natural disasters on new and existing properties, infrastructure, and local economies, and promote education, outreach, and research and development programs to improve the knowledge and awareness among the citizens and industry about hazards they may face and mitigation alternatives that can reduce vulnerabilities.

In accordance with the Federal Register Notices (87 FR 6364 and 87 FR 31636), Baldwin will ensure that the mitigation measures identified in this Recovery Plan will align with existing FEMA hazard mitigation plans or other state, local, or tribal hazard mitigation plans. In addition, mitigation measures will be incorporated when carrying out activities to construct, reconstruct, or rehabilitate residential or non-residential structures with CDBG-DR funds.

3.5.4 BROADBAND INFRASTRUCTURE IN HOUSING

Broadband refers to a high speed, always-on connection to the Internet.

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

Because of the growth and development within Baldwin County, the Baldwin County Strategic Plan (2021-2026) aims to engage with stakeholders and providers to increase availability of high-speed internet to 95% of residents and businesses in the county. In the event the County invests in new housing construction with CDBG-DR, Baldwin County will require a review for the feasibility of implementing the requisite broadband infrastructure in the plans and specifications

approval process and will perform on-site inspections during construction and post construction to ensure compliance, where applicable. Feasibility of installing broadband infrastructure will be considered as appropriate for other projects where connections may be needed to meet outcomes.

3.5.5 COST-EFFECTIVENESS

As a recipient of federal funds, Baldwin County is responsible for ensuring that the costs of its disaster recovery activities are allowable, reasonable, necessary, and cost-effective. Baldwin will establish policies and procedures to assess the cost-effectiveness of each proposed project undertaken to assist a household or area under any rehabilitation, reconstruction, new construction, or service activity funded by CDBG-DR funds. Those policies and procedures will address criteria for determining when the cost an activity is not cost-effective (for example, repair and construction of drainage costs exceed average or determined thresholds) and address possible alternatives if found not to be cost-effective.

Any exceptions to maximum award limitations are subject to grant fund availability. The limited instances of providing exceptions to maximum award amounts will be based on criteria specified in the policy, such as: the process used to analyze the circumstances under which an exception was necessary, how the amount of assistance is necessary and reasonable, per 2 CFR part 200, subpart E—Cost Principles, and justifying the reasonable accommodation requests under Section 504 or measures to address program recognized environmental conditions, which can be addressed through construction measures necessary to mitigate the consequences of those conditions.

3.5.6 DUPLICATION OF BENEFITS

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) prohibits federal agencies from providing assistance to any “person, business concern, or other entity” for any loss to which the recipient has already received financial assistance from another source (42 U.S.C. 5155(a)). Baldwin County will ensure that each CDBG-DR program or project provides assistance only to the extent that the recipient’s project funding needs have not been met by another source.

Policies and procedures for addressing potential DOB will be incorporated into the design and administration of programs and projects. At a minimum, these procedures will include required actions for:

- Verifying all sources of disaster assistance.
- Determining the amount of the unmet need (for projects or applicant-based programs) before determining or awarding assistance.
- Ensuring recipients or beneficiaries enter a signed agreement to repay the assistance if they later receive other disaster assistance for the same purpose.
- Identifying a method to monitor compliance with the terms of the agreement for a reasonable period.
- Identifying the personnel or unit of government responsible for carrying out the DOB review.

- The completion and retention of documentation demonstrating the review process in compliance with CDBG-DR record keeping requirements.

3.6 Capacity Assessment

To prepare for the Local Recovery Plan program and the management of CDBG-DR funds, Baldwin County provided ADECA with a Capacity and Risk Assessment Implementation Plan that identified trainings and timelines for capacity building in relation to the award. Baldwin County also provided the following documents to ADECA to meet grant conditions and demonstrate its ability to meet requirements of the CDBG-DR funds:

- Outreach and Communications Plan
- Procurement policies
- Financial Management policies
- Procedures to Protect Personally Identifiable Information (PII) for CDBG-DR Programs
- Citizen Participation Plan
- Monitoring Plan

In addition to building capacity in the Grants Department through trainings, the Baldwin County Commission plans to continue working with consultants and contractors to provide technical assistance. A consultant team will be brought on to provide implementation support to Baldwin County's Grants Department as it builds internal capacity and will continue to be a resource that the County utilizes through the rollout of the CDBG-DR programming.

3.7 Federal Requirements

The Federal Requirements section details the minimum federal requirements that the County will take active efforts to meet while implementing programs identified in this Plan and in designing and creating its policies and procedures. The actions Baldwin County will take to comply with the outlined federal requirements will be detailed in administrative and program policies and procedures along with any forms or additional tools required.

3.7.1 ENVIRONMENTAL REVIEW

The implementing regulations for Environmental Review are found at 24 CFR 58. The major objective of environmental review is to ensure that HUD funded projects are not harmful to the environment and that the environment is not impacting HUD funded projects. Baldwin County will consult with appropriate federal and state agencies in order to determine the extent of the environmental impact a project may have in accordance with 24 CFR 58.

The County will comply with all required environmental assessments, studies, and planning efforts to minimize any negative impacts a project may have in accordance with 24 CFR 58. The County will abide by all regulations, procedures, and requirements under 24 CFR 58, to include not expending project specific funds until receipt of the Authorization to Use Grant Funds (AUGF) by ADECA.

3.7.1.1 Avoiding Choice-Limiting Actions

Regulations regarding choice limiting activities can be located at 24 CFR 58.22. The objective of this regulation is to outline what is defined as a choice limiting activity and a violation of 24 CFR 58.22. This is to assist grantees and subrecipients in determining what project activities are allowed to be engaged and at what time actions can be implemented. Baldwin County will consult 24 CFR 58.22 during the planning stages of grant funds to ensure it avoids engaging in choice limiting activities prior to receipt of the AUGF from ADECA.

3.7.2 URA - ACQUISITION AND RELOCATION

The implementing regulations for the URA are found at 49 CFR 24. The URA's major objective is to ensure that property owners and displaced persons impacted by federally funded projects are treated fairly, consistently, and equitably; that property owners are paid a fair market price for their property; and displaced persons are provided required relocation assistance.

Baldwin County must comply with the URA for its HUD-funded programs and will ensure any programs that include acquisition of property and that may require residents to relocate follow the regulations, procedures, and requirements under URA.

3.7.3 LABOR STANDARDS

3.7.3.1 Davis-Bacon

The regulations concerning managing the requirements of Davis Bacon and Related Acts (DBRA) are found in 29 CFR part 1-5. The major objective of these regulations are to standardize wages, increase accountability in payroll management, and provide protection for laborers and mechanics working on federally funded construction projects. Baldwin County must comply with DBRA standards for its HUD-funded programs and will ensure any projects that require construction over \$2,000 will follow all applicable regulations, procedures, and requirements under DBRA.

3.7.3.2 Copeland's Act's Anti-Kickback Provision

The Copeland Anti-Kickback Act (40 USC, Chapter 3, Section 276c and 18 USC, Part 1, Chapter 41, Section 874; and 29 §Part 3) requires that workers be paid weekly, that deductions from workers' pay be permissible, and that contractors maintain and submit weekly payrolls.

Baldwin County must comply with Copeland Anti-Kickback Act for its HUD-funded programs and will ensure any projects that require construction over \$2,000 will follow all applicable regulations, procedures, and requirements under Copeland Anti-Kickback Act.

3.7.3.3 Contract Work Hours and Safety Standards Act

The Contract Work Hours and Safety Standards Act (CWHSSA) (40 USC, Chapter 5, Sections 326-332; and 29 CFR §4, 5, 6 and 8; 29 CFR §70 to 240) applies to contracts over \$100,000 and requires that workers receive overtime compensation (time and one-half pay) for hours they have worked in excess of 40 hours in one week. Violations under this Act carry a liquidated damages penalty (\$32 per day per violation).

Baldwin County must comply with CWHSSA for its HUD-funded programs and will ensure any projects that require construction over the threshold will follow all applicable regulations, procedures, and requirements under CWHSSA.

3.7.3.4 Force Account Labor

Regulations pertaining to force account labor can be found in 40 CFR 35.6500. The objective of forced account labor is preventing entities from finding ways around DBRA and its regulations and protections of laborers and mechanics. The County will obtain approval from ADECA prior to the use of forced account labor unless unforeseen circumstances occur.

When seeking the approval of using forced account labor, Baldwin County will provide sufficient justification to ADECA for its approval on the County's HUD-funded projects that require construction. The County will sufficiently document the need and justification for the use of force account labor in compliance with 40 CFR 35.6500.

3.7.4 ELEVATION REQUIREMENTS

Elevation requirements that State of Alabama and its subrecipients must adhere to can be located in 87 FR 31636, II.B.2.c, subtitled "Elevation standards for new construction, reconstruction and rehabilitation of substantial damage, or rehabilitation resulting in substantial improvements." To this effect, future property damage will be minimized by requiring that any rebuilding be done according to the best available science for the area with respect to base flood elevation (BFE).

The County requires any residential or non-residential structure in a flood zone or special flood hazard zone to be constructed at one foot above the minimum BFE. The BFE plus one foot may also apply to reconstruction, or substantial rehabilitation of residential or non-residential structure in the special flood hazard zone on any HUD funded program. The County will abide by all elevation requirements in II.B.2.c of 87 FR 31636 (May 24, 2022).

3.7.5 BUILDING STANDARDS

HUD programs that require construction, reconstruction, or rehabilitation of buildings – residential and non-residential, are governed by the 2016 final rule in [81 FR 18473 \(March 31, 2016\)](#) for green building standards and general building standards. The major objective of green building regulations is to make structures, both residential and non-residential, more energy efficient and sustainable, which will impact the reduction of footprints and reduce the overall environmental impact of projects.

Baldwin County will require construction contractors and housing program participants to incorporate green building standards into the planning and construction of any structure funded with HUD grant funds. The County must comply with green building standards for its HUD-funded programs and will ensure any programs that require construction will follow all applicable regulations, procedures, and requirements under 81 FR 18473 (March 31, 2016).

3.7.6 SECTION 3

HUD funded projects of \$200,000 or more are governed by Section 3 of the Housing and Urban Development Act of 1968 (Section 3), as amended. In November of 2020, HUD effectively implemented the Final Rule located in [85 FR 61524 \(September 29, 2020\)](#) that provides additional clarification and requirements relating to Section 3 requirements.

Baldwin County must comply with the Final Rule for its HUD-funded programs and will ensure any programs that meet the Section 3 threshold follow the regulations, procedures, and

requirements under 85 FR 61524 (September 29, 2020) for outreach and employment of low-income individuals and business owners on federally funded projects.

3.7.7 MINORITY AND WOMAN-OWNED BUSINESS ENTERPRISES (M/WBE)

Regulations and requirements pertaining to M/WBEs, what qualifies and the hiring of these firms, are found under Section 281 of Title II of the National Affordable Housing Act of 1990 (42 U.S.C. 130.12831), and Public Law 102-389 (42 U.S.C. 4370d), respectively and 2 CFR 200.321.

When procuring for goods and services on HUD funded programs, Baldwin County will make every effort to encourage M/WBEs to apply for contracts, break contracts down when reasonable to make it more feasible for M/WBEs to be competitive, and other actions to comply with Title II of the National Affordable Housing Act of 1990 and 2 CFR 200.321.

3.7.8 CIVIL RIGHTS AND NON-DISCRIMINATION

The County is required to comply with the Civil Rights requirements of Title I of the Housing and Community Development Act and the Fair Housing Law. Recipients must demonstrate compliance with the following requirements contained in the Housing and Community Development Act and will include requirements as part of all applicable CDBG-DR projects.

- Affirmative steps to promote fair and equal access to housing must be taken, regardless of the type of grant;
- Equal opportunities must be afforded to all persons;
- No person shall be excluded or denied program benefits on the basis of race, color, religion, sex, national origin, age or disability;
- Minority and female-owned businesses must be informed of grant funded contracts. Affirmative steps must be taken to assure this; and
- To the greatest extent feasible, Section 3 residents and business owners should be given preference in employment, training, and contracting.

3.7.9 AMERICANS WITH DISABILITIES ACT

Baldwin County takes affirmative steps to ensure that qualified persons with disabilities are informed of the availability of program services and activities, and all disaster recovery programs, or services are readily accessible to, and usable by, individuals with disabilities, in accordance with Title II and the Americans with Disability Act. The County also ensures that handicapped persons are provided with benefits and services as those provided to non-handicapped individuals, and that all programs and activities are accessible, both structurally and administratively, to handicapped and disabled persons. The types of reasonable accommodations that can be provided include accommodations or adjustments to a rule, policy, practice, or service.

The County will ensure CDBG-DR programs and services do not discriminate based on disability and all buildings and facilities comply with Title II accessibility requirements, such as curb ramps at intersections and no barriers to entry from street level.

3.7.10 CONFLICT OF INTEREST AND CONFIDENTIALITY

Conflict of interest requirements are dictated by HUD as well as Alabama state and local laws. Alabama's Conflict of Interest standards of conduct applies to all procurement activities, while all

non-procurement activities (acquisition and disposition of property, direct assistance to individuals or businesses) are subject to HUD requirements described in 570.489(h).

The general rule is that persons acting on behalf of state or local government in a decision-making role or who are in a position to gain inside information (and their family members) in state CDBG-DR funded activities cannot obtain a financial interest or benefit from state CDBG-DR funded activities. Prohibition ends one year after the decision-making person has left their position.

If the County requests an exception for county or locality employees or agents, a request would be submitted to ADECA for consideration and then provided to HUD. HUD would evaluate and decide the outcome. Factors to be included in exception requests and considered when evaluating them include:

- Whether the exception would provide a significant cost-benefit or essential degree of expertise that would otherwise be missing;
- Whether an opportunity was provided for open competitive bidding;
- Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries, and the exception will allow the person to receive the same benefits as other members of the class;
- Whether the person has withdrawn from the role of decision-maker;
- Whether the interest or benefit was present before the affected person became an employee, agent, consultant, officer, or elected official or appointed official of the state, or locality, or of any designated public agencies, or subrecipients which are receiving CDBG- DR funds;
- Whether undue hardship will result to the state, the County or affected person when weighed against the public interest;
- Any other relevant considerations; and
- Request for exception must include public disclosure & attorney opinion that exception does not violate state or local law.

4 Grantee Proposed Use of Funds

4.1 Overview

The County will address remaining impacts from Hurricane Sally and Hurricane Zeta through programs that meet the greatest needs in the housing, infrastructure, and economic revitalization sectors and support a stronger recovery in future disaster events. The \$43,361,686 will be divided so that \$19,219,010 goes to housing activities, and \$24,142,626 is invested in infrastructure activities.

Table 67: Unmet Needs Summary

Sector	Unmet Needs per Sector	% of Unmet Needs	Budget Allocation per Sector	% of Total Budget
Housing	\$194,785,457	32%	\$19,219,010	45%
Infrastructure	\$82,682,454	14%	\$24,142,626	55%
Total	\$608,389,312		\$43,361,686	

Baldwin County is proposing the following programs for its CDBG-DR funds:

1. *Homeownership Assistance*: This program will give disaster impacted low-income households support to return to or stay in Baldwin County in the face of rising housing costs. The Homeownership Assistance program will assist low-to-moderate (LMI) households purchase a home by providing CDBG-DR funds to assist with the downpayment, closing costs, and/or interest rate buydowns.
2. *Infrastructure Recovery*: This Infrastructure Recovery Program will provide a direct County-led program and a subrecipient-led approach.
 - a. The Local Government Recovery Infrastructure Program will focus on assisting local governments and organizations in their infrastructure recovery needs, such as sewer and drainage improvements or roadway improvements.
 - b. The County Priority Infrastructure Program will allow the County to address and prioritize recovery needs that have a larger, and in some cases county-wide, impact.

4.2 MID Recovery Zones

Baldwin County was identified as a Most Impacted and Distressed (MID) area from Hurricanes Sally and Zeta in the Federal Register Notices and ADECA's 2022 Action Plan. Baldwin did a further assessment, based on disaster impacts and other factors, to identify MID Recovery Zones within the county.

The MID Recovery Zones, as defined in the Local Recovery Planning Program (LRPP), are designated areas within the MID counties. These zones focus on areas identified by local unmet needs assessments that were significantly impacted by disasters. The purpose of these zones

is to concentrate recovery and mitigation activities, ensuring that efforts are directed toward reducing future risks, mitigating against disasters, and addressing the needs of the most vulnerable populations.

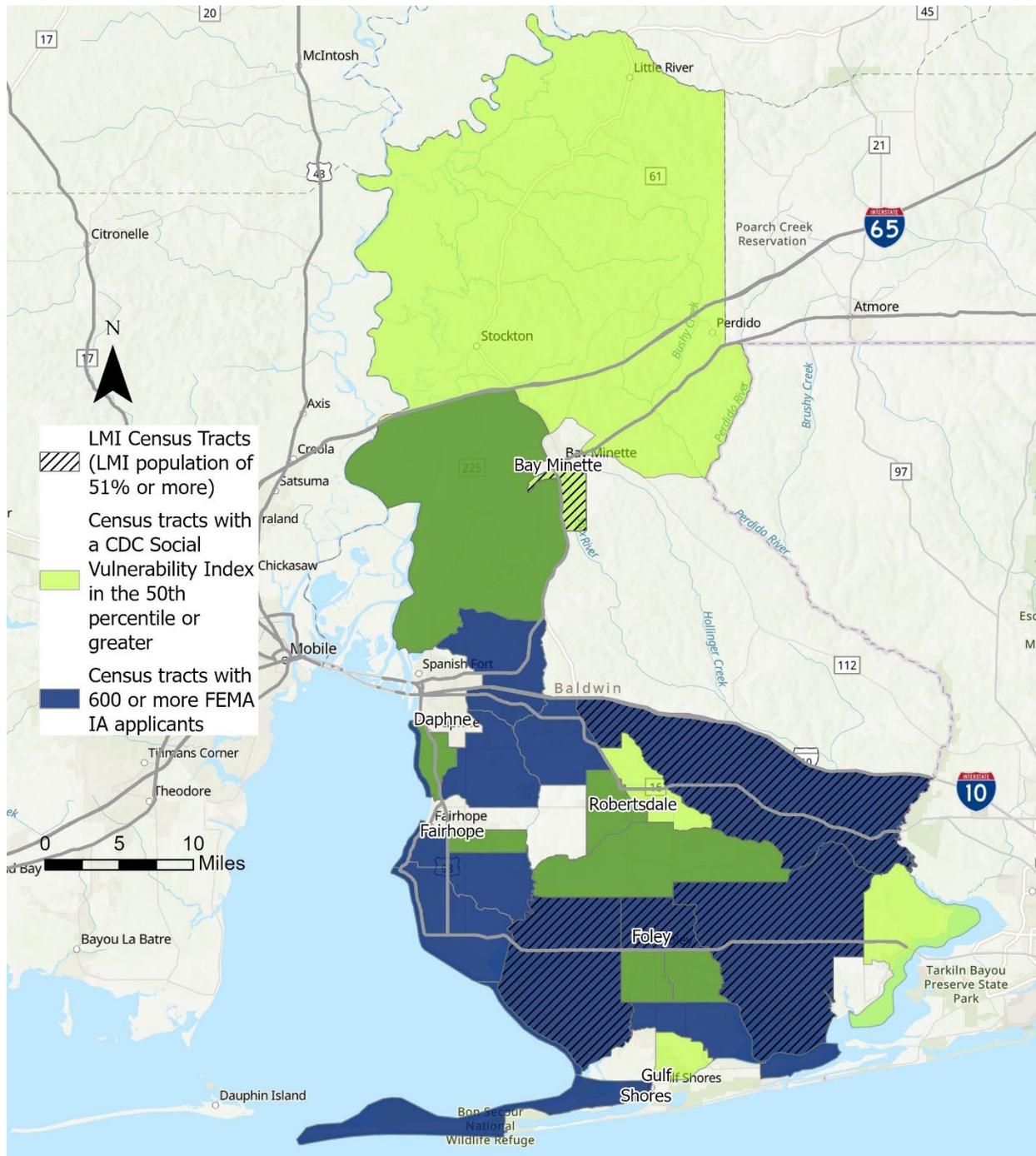
The MID Recovery Zones account for vulnerability as well as disaster impact. The following spatial layers were overlaid to determine the MID Recovery Zones:

1. Census tracts with a CDC Social Vulnerability Index in the 50th percentile or greater (see Section 2.3.4.2 for more information)
2. Census tracts with 600 or more FEMA IA applicants (see Section 2.3.2 for more information)
3. Census tracts with 51% or more low- to moderate-income (LMI) households (see Section 2.2 for more information)

There are no census tracts that meet all three of the criteria listed above. From the map below which shows census tracts that meet the different criteria, high social vulnerability areas include north Baldwin County and some tracts in the south, including the town of Summerdale. Disaster-impacted tracts, or those with 600 or more FEMA IA applicants, are clustered in south Baldwin County; many tracts that meet this criterion also have high LMI populations.

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Figure 8: Map of Criteria for MID Recovery Zones

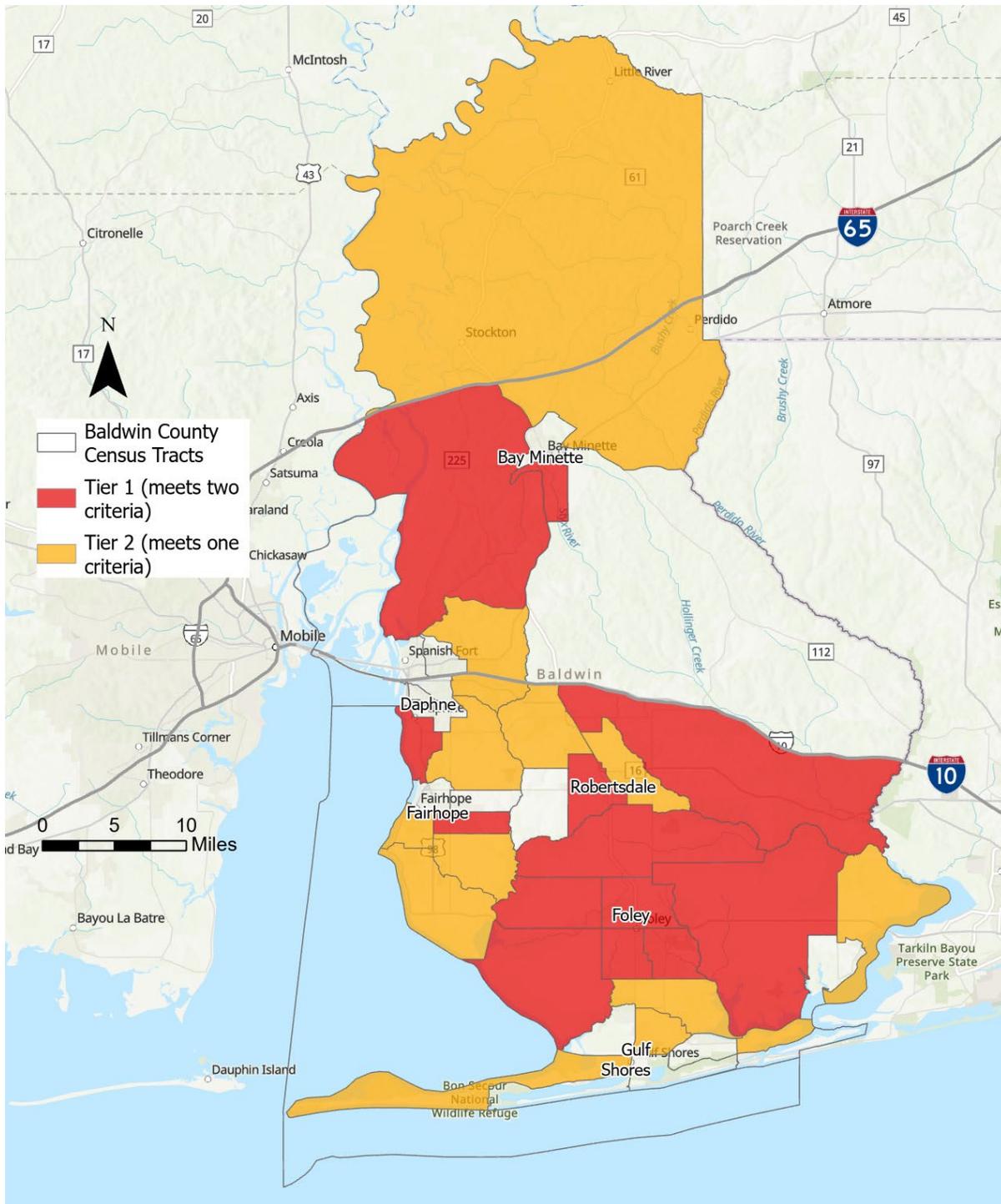


Source: CDC SoVI; FEMA IA; HUD

To determine the MID Recovery Zones, census tracts meeting at least two of the three criteria described above are identified as first tier MID Recovery Zones, while tracts meeting one of the three criteria are second tier MID Recovery Zones (Figure 8). The Zones will be prioritized for program services in the county, described in Section 4.5.

Figure 8 shows that Tier 1 includes 13 census tracts, and Tier 2 includes 14 census tracts. The census tracts are listed in Table 68.

Figure 9: Map of Proposed MID Recovery Zones, Tier 1 and 2



Source: CDC SoVI; FEMA IA; HUD

Table 68: MID Recover Zone - Census Tract Tiers

Tier 1 Census Tracts (meets two criteria)	Tier 2 Census Tracts (meets one criteria)
Census Tract 115.04	Census Tract 107.09
Census Tract 111.04	Census Tract 114.13
Census Tract 115.03	Census Tract 114.11
Census Tract 109.08	Census Tract 107.08
Census Tract 114.10	Census Tract 114.19
Census Tract 114.09	Census Tract 116.03
Census Tract 109.04	Census Tract 114.14
Census Tract 115.01	Census Tract 111.02
Census Tract 108	Census Tract 113
Census Tract 110	Census Tract 101
Census Tract 103	Census Tract 102
Census Tract 106	Census Tract 109.06
Census Tract 116.01	Census Tract 109.03
	Census Tract 112.02

Source: CDC SoVI; FEMA IA; HUD

The MID Recovery zones help in identifying eligible recovery and mitigation activities and potential recipients for program funds. The MID Recovery zones include the following municipalities and surrounding unincorporated areas:

- Bay Minette
- Portions of Stapleton
- Robertsdale
- Silverhill
- Summerdale
- Foley
- Elberta
- Magnolia Springs
- Portions of Fairhope
- Portions of Daphne

While the entire county is considered a MID under the CDBG-DR allocation, Tier 1 Census Tracts and the corresponding municipal areas will be given priority consideration for CDBG-DR funding for programs. Tier 2 Census Tracts may be eligible for funding based on program selection criteria and other program priorities.

4.3 Program Priorities

The proposed programs and methods of distribution described in this Local Recovery Plan are intended to address the remaining recovery needs in housing and infrastructure by using the funds available to achieve the greatest outcomes. Programs in this plan were designed according to the needs of the community, the County’s capacity to implement, and the timeline of ADECA’s award.

Recovery programs in this plan and subsequent activities must:

- Be an eligible activity for CDBG and ADECA’s LRPP,
- Meet a National Objective,
- Have a clear “tie-back” or relation to Hurricanes Sally or Zeta, and

- Address direct or indirect disaster-related impacts.

In addition to the ADECA program guidelines for the Local Recovery Plan at a state level, these CDBG-DR funds are also guided by federal requirements posted in the February 3, 2022 ([87 FR 6364](#)) and May 24, 2022 ([87 FR 31636](#)) Federal Register notices for Public Law 117-43, which addressed 2020 disasters.

Priorities for funding will be determined within each program, as well as comply with HUD and ADECA requirements and priorities for serving low-to-moderate income households and the most impacted areas. Additionally, programs will need to consider cost reasonableness and feasibility as part of program design and project selection to ensure CDBG-DR funds are used effectively and appropriately.

Program Criteria

While each program has its own requirements and criteria that will be utilized in project selection and distribution of funds, there are several criteria that apply universally.

1. All programs will seek to serve:
 - Current residents of Baldwin County,
 - Former residents of Baldwin County who were displaced directly or indirectly by the disaster, and
 - Will prioritize LMI and vulnerable populations. LMI will be determined based on household income and current income limits as determined by HUD (Table 69). For details on vulnerable populations reference section 2.3.5.2, *Social Vulnerability*.

Table 69: Low and Moderate Income (LMI) Limits, Baldwin County, 2024

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Very Low (<50% AMI)	\$31,200	\$35,650	\$40,100	\$44,550	\$48,150	\$51,700	\$55,250	\$58,850
Low (<80% AMI)	\$49,950	\$57,050	\$64,200	\$71,300	\$77,050	\$82,750	\$88,450	\$94,150

Source: HUD FY 2024 Income Limits Summary

2. The MID Recovery Zones as identified in section 4.2 will be given priority consideration as long as all other program requirements are also appropriately met.
3. Projects selected will need to be able to meet the timelines identified within the program's guidelines.
4. Where possible, programs will consider projects with proposed activities that may address hazard mitigation risks and impacts in future disasters.

These identified program priorities will ensure Baldwin County is providing CDBG-DR funds to areas and individuals that were most impacted and support the county's recovery needs. Projects considered under any LRP program, whether managed by the County or a subrecipient, must demonstrate how activities meet program priorities as part of project documentation.

Cost Reasonableness

As part of compliance with HUD CDBG-DR requirements and cost principles described in the Uniform Administration Requirements under [2 CFR 200](#), the County will only approve projects that can reasonably support cost feasibility. Each project, whether implemented by the County or a subrecipient, will need to provide sufficient evidence that the project costs are reasonable, necessary and allocable for the funding.

- **Cost Reasonable:** A cost is reasonable if it, in its nature and amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the County's or subrecipient's project is predominantly federally funded. In determining reasonableness of a given cost, consideration must be given to:
 - Whether the cost is of a type generally recognized as ordinary and necessary for the operation of a non-Federal entity or the proper and efficient performance of the Federal award.
 - The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.
 - Market prices for comparable goods or services for the geographic area.
 - Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities, its employees, where applicable its students or membership, the public at large, and the Federal Government.
 - Whether the County or subrecipient significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.
- **Necessary and allocable:**
 - Costs must be shown to be necessary to the milestones, completion, and outcomes of the project.
 - Costs must be eligible under CDBG-DR and LRP guidelines and be incurred specifically for the purposes of the project during the award period of performance.

Projects under any LRP program that cannot be reasonably managed by either the County or subrecipients and cannot demonstrate that costs are reasonable and necessary will not be considered for CDBG-DR funding.

4.4 Connection to Unmet Needs

As seen in Section 2, Unmet Needs Assessment, there are remaining recovery needs across all sectors and areas of Baldwin County. The needs assessment influenced the design and prioritization of recovery programs identified in the Local Recovery Plan. Additionally, Baldwin County consulted with stakeholders, local governments, and public housing authorities to assess needs and understand the impacts immediately after the storms and the conditions that exist four-years later. The County received inputs from stakeholders on the community's needs

for housing, infrastructure and economic revitalization and feedback on services or activities needed to achieve a full recovery. CDBG-DR funding will address the most critical unmet needs that remain after other funding sources, including local, state, FEMA and SBA, have been expended. Baldwin County has also examined how the State is allocating CDBG-DR funding to administer programs across communities. This assessment has been done to ensure that the County's CDBG-DR funding is used where it is most needed.

Addressing the unmet housing and infrastructure needs are the primary focus of this Local Recovery Plan and its programs. Following the guidance in the applicable Federal Register notices and the LRPP Guidelines, Baldwin County will allocate 45% of its CDBG-DR award towards housing and supporting homeownership to build greater housing stability for families. The remaining amount of the CDBG-DR award will be allocated to an infrastructure program that will address approximately one third of the unmet need through sewer and drainage improvements or roadway improvement projects throughout the county.

4.5 Program Details

4.5.1 HOUSING PROGRAM

Baldwin County conducted data collection and received stakeholder input from multiple sources to determine an overall unmet housing needs at the local level, including input from local entities and organizations across the county. Those efforts included:

- Outreach to local organizations and municipalities on priorities and barriers related to rental and homeownership.
- Discussions to determine key barriers for household to achieve safe and sanitary housing.
- Stakeholder engagements to collect additional data, ideas, and input on solutions, priorities, and barriers for effective housing programming.

Efforts to collect data and gather feedback on needs ensures that the County focuses its CDBG-DR award on programming for target populations to have the greatest impact on the County's recovery, resilience, and future growth, while also addressing timely expenditure requirements of the CDBG-DR grant.

This program will give disaster impacted low-income households support to return to or stay in Baldwin County in the face of rising housing costs.

4.5.2 HOMEOWNERSHIP ASSISTANCE

4.5.2.1 Activity Description

As noted in the Housing Unmet Needs section of this plan, in 2022, over 40 percent of renters were cost burdened, paying more than 35 percent of their monthly income to housing costs. The Homeownership Assistance program is designed to assist low-to-moderate (LMI) households with the purchase of affordable housing using HUD CDBG-DR funds. The program assistance is intended to fill the gap between what an LMI applicant can afford for a first mortgage and the purchase price of a single-family home.

Program assistance can be used to cover the applicant's downpayment, reasonable closing costs, and interest rate buy-downs. Homes for purchase must be single-family dwellings located outside floodplains or disaster risk reduction areas identified by the County, or its municipalities, as areas impacted by the qualifying disaster and likely to be impacted again. Lenders and housing counselors will support the implementation of the program, and the housing authorities, local realty, and community organizations will help promote the program opportunity. Lenders participating with the program will identify applicants that meet program requirements once the program is open for applications. This non-competitive, pre-screening method will allow for the quickest deployment of funds.

The program leverages the waiver of 42 USC § 5305(a)(24)(A) and (D) found in the Federal Register Notices applicable to Hurricanes Sally and Zeta to allow the program to serve qualified households at or below 120 percent Area Median Income (AMI), with a priority for applicants at or below 80% AMI. Program eligibility and National Objective is based on the household's annual total adjusted gross income for all household members aged 18 and older.

Method of Distribution

The County will administer the program and provide direct assistance to eligible applicant households in the form of a loan secured with a lien on the property for the CDBG-DR assistance through a Mortgage deed and Restrictive Covenants for a five (5) year affordability period. This will require the household to maintain primary residence in the home for five years immediately following the purchase. Requests for assistance will be evaluated first come, first served for applications that meet all applicable eligibility requirements for assistance. The maximum assistance amount has been set at \$85,000 in combined assistance per qualifying household, with the actual amount calculated based on need for the qualifying home purchase.

4.5.2.2 National Objective

In accordance with 24 CFR 570.483 and alternative requirements under the Federal Register allocation notices (87 FR 6364 and 87 FR 31636, respectively) as prescribed by ADECA's Action Plan, the Homeownership Assistance program will have activities which meet one of the following national objectives:

- Low-to Moderate-Income Housing (LMH), when the purchasing household is at or below 80 percent Area Median Income (AMI)
 - To achieve the requirements of benefiting Low-to Moderate-Income Housing (LMH), permanent residential structures are to be occupied by a LMI household.
- Urgent Need, when the purchasing household is above 80% percent Area Median Income (AMI) and below 120 percent Area Median Income (AMI), as approved by ADECA pending availability of Urgent Need waiver from HUD.
 - As demonstrated by HUD's waiver to allow provision of direct assistance to facilitate and expand homeownership among persons at or below 120 percent of area median income, the ability of low- and moderate-income households to secure and maintain housing following a disaster is negatively impacted by direct damage to housing stock and economic impacts, such as job losses and increased living costs. The lack of secure housing poses a serious and

immediate threat to the welfare of the impacted community and its ability to fully recover as it increases outmigration and homelessness.

4.5.2.3 Eligible Activity

Providing support for homeownership is an eligible activity in accordance with the following applications:

- Homeownership Assistance, per HCDA Section 105(a)(24) for households at or below 80 percent Area Median Income (AMI).
- Homeownership Assistance, per the waiver of 42 USC § 5305(a)(24)(A) and (D) found in the Federal Register Notices applicable to the Hurricane Sally CDBG-DR grant, for households at or below 120 percent Area Median Income (AMI).

This program will provide direct assistance to expand homeownership by making the current housing market more attainable for eligible households with an emphasis on providing attainable housing options outside of high-risk areas as designated by Baldwin County and its municipalities.

Approved applicants will also be required to participate in housing counseling. Housing counseling and legal services providers will help impacted residents, vulnerable populations, and members of underserved communities by:

- Providing access to fair housing information for participants.
- Providing guidance and counseling services to LEP households.
- Assessing housing needs and financial resources and addressing other concerns about short- and long-term housing.
- Discussing the unique assistance needs and resources that are available.
- Connecting with State and local recovery resources.
- Communicating with lender, insurance companies, and government agencies.
- Supporting application intake and assisting with the necessary paperwork for disaster recovery programs, thereby reducing barriers of entry into disaster recovery and other funding programs.
- Reviewing income, expenses, credit, and debt and helping to develop ways to improve a participant's financial situation.
- Providing other housing navigation services, as needed.

4.5.2.4 Eligible Costs

Eligible program costs will include:

- Down payment assistance,
- Interest rate buy-down,
- All reasonable closing costs (including but not limited to legal, closing fee, title search, conveyance documents, notary fees, surveys, recording fees, lender fees, appraisal, and inspections),
- Legal services needed to help impacted residents transition to permanent housing, and
- Housing counseling costs.

Costs must be within the program's award cap to be considered eligible. The County may determine additional eligible or ineligible costs within the program's guidelines.

4.5.2.5 Eligibility Criteria

Eligible Applicants

- Eligible applicants are low to moderate income households that were Baldwin County residents at the time of the disaster, including LMI renters, LMI property owners who occupied and owned, and LMI homebuyers in the process of purchasing a home that was damaged by the Presidentially declared disasters DR-4563 and DR-4573. Since this program does not include buyout assistance, property owners' homes must have been sold and no liens remain. This is to mitigate against open liens against the applicant from becoming a lien against the new property.
- Household income for the intended homebuyer's household must meet the income limits of the program. Household income is the household's annual total adjusted gross income for all household members 18 and older who will occupy the purchased home.
- Eligible applicants must have a valid lender pre-approval for a first mortgage at the time of application to the program.
- Eligible applicants may be required to contribute up to one percent of the approved mortgage amount towards downpayment or closing costs to represent the buyer's investment.
- Confirmed eligible program applicants will become an eligible program participant. Program participants will be required to engage in housing counseling before purchasing a home as a condition of assistance.
 - Housing counselors will explain to each participant the Homebuyer Assistance program, review the process involved in obtaining financing, and work with participants to establish their property purchase eligibility, along with their financial and affordability thresholds.
 - Program participants must agree to stay in the home for five years following the purchase. The 5-year affordability period will include a hardship waiver process that would allow a participant in good standing to exit the program.
- Further eligibility criteria and participation requirements will be set forth in the program guidelines.

Eligible Homes

- Properties eligible for purchase must be already constructed single-family dwellings within Baldwin County.
- Properties must pass housing quality inspections.
- Properties must be located outside the 100-year floodplain and outside disaster risk reduction areas identified by the County or its municipalities as areas impacted by the qualifying disaster and likely to be impacted again.

Eligible Lenders

Lenders participating with the program will identify applicants that meet the program requirements and are pre-approved for a home loan. Lenders will be required to complete a training module on the program eligibility and requirements, including, but not limited to Fair

Housing, Equal Opportunity, and Affirmative Marketing practice to ensure prevention of discriminatory practices and failure of benefits reaching protected groups and vulnerable populations.

4.5.2.6 Tieback to the Storm

Hurricanes Sally and Zeta caused significant damage to both the owner-occupied and rental housing stock, depleting an already limited housing supply and exacerbating increases in house prices above affordable levels. Furthermore, many households may not be able to afford long term homeownership in their current location due to high costs associated with rebuilding, maintenance, and insurance. The unmet need to be addressed is providing affordable homeownership for low to moderate income families in areas where housing stock already exists to ensure that the disaster recovery grant is invested into the recovery of property owners/renters that lived in the most impacted areas.

Households that were residents in Baldwin County at the time of the disaster, and low to moderate income property owners who occupied and owned or were buying a home in Baldwin County that was damaged by Hurricanes Sally or Zeta, will be eligible to participate.

4.5.2.7 Program Priorities

The Homeownership Assistance Program will help create or expand opportunities for homeownership for low-to-moderate income households that were impacted by Hurricanes Sally and Zeta and create greater housing stability throughout the county. The program will prioritize LMI households at or below 80% median income. Outreach and messaging will focus on engaging LMI households that may be:

- Renter households that were impacted by DR-4563 or DR-4573 and are approved to purchase a home;
- Owner households that that were impacted by DR-4563 or DR-4573 and are approved to purchase a home; and/or
- Households that moved out of Baldwin County after the storms and are interested in relocating back to the county.
- Program applications for 80% area median income households will be accepted as long as available program funding remains.

Table 70: Low and Moderate Income (LMI) Limits, Baldwin County, 2024

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Very Low (<50% AMI)	\$31,200	\$35,650	\$40,100	\$44,550	\$48,150	\$51,700	\$55,250	\$58,850
Low (<80% AMI)	\$49,950	\$57,050	\$64,200	\$71,300	\$77,050	\$82,750	\$88,450	\$94,150

Source: HUD FY 2024 Income Limits Summary

A second phase may be opened to these same household types between 81% and 120% AMI if funds are available.

4.5.2.8 Feasibility

A homebuyer assistance program can be quickly developed and deployed following approval. The County can begin engaging lenders and community partners to plan for program set up with minimal cost. The program is also a low compliance risk as it does not require additional sources of funds, relies on existing housing stock, and does not trigger the more complex federal requirements associated with building and development.

The program guidelines will set forth an approach for determining necessary and reasonable costs which will include an analysis of purchase costs, affordability, and need. Awards will be based on the financial affordability determination for the household. By requiring housing counseling for all participating buyers, the program will help ensure that buyers are better prepared for homeownership and that assistance is committed to qualified buyers who will move through the process more quickly.

4.5.2.9 Budget

This program will receive up to \$16.5 Million for direct assistance to homebuyers and up to \$2.7 Million for activity delivery costs. The program expects to serve up to 200 households.

Budget Category	Funding Level
Homeownership assistance direct costs	\$16,500,000
County program administration (15%), including support for outreach, housing counseling, intake and evaluation, case management, and loan closing	\$2,719,010
Total Funding	\$19,219,010

Based on current average income levels and single-family housing prices, the program will cap assistance at \$85,000 per household. This is an up to amount of assistance, with actual assistance needed to be determined by the purchase price, the amount of the first mortgage, and the federal cost principles of necessary and reasonable. The specific calculation for awards will be established in program guidelines.

4.5.2.10 Timeline and Readiness

Implementation of this program will begin in January 2025. The County anticipates accepting applications for the program beginning in April/May 2025. All funds must be expended by May 2026.

Program Development Action	Estimated Timeline
Engagement with Lenders	30 days after LRP approval
Participating Lenders Training	90 days after LRP approval
Application Reviews begin	120 days after LRP approval
Applicant approvals, counseling, and home purchases	Ongoing
Project Completion	March 2026
Program Closeout	May 2026

4.5.2.11 Partners

Partners will include local housing agencies, such as the Bay Minette Housing Authority and Foley Housing Authority, who will play a critical role in driving outreach for the program. Additional partners will include local realty and lending professionals, HUD-certified housing counselors, nonprofit, and community-based organizations that provide a wide range of counseling services. These services include foreclosure prevention, relocation services, title transfers and title searches, and debt management.

Municipalities within the County may also benefit from program participants desiring to acquire a home within their jurisdictional boundaries. The County may enter into a memorandum of understanding with Municipalities in the county to ensure the program is lending funds for the acquisition of properties that meet the program guidelines.

4.5.3 INFRASTRUCTURE PROGRAM

Baldwin County conducted data collection and received stakeholder input from multiple sources to determine an overall unmet infrastructure need on both a County- and local- (municipalities and local organizations) level. Those efforts included:

- Collecting FEMA Public Assistance (PA) data to capture the types and amount of public infrastructure damages reported by jurisdictions through applications for assistance.
- Surveying local organizations and municipalities on funding needs related to current disaster recovery infrastructure projects.
- Conducting stakeholder engagements to collect data on a governmental and non-governmental level.
- Discussing projects with County departments which have a need for funding and have established a disaster recovery impact across multiple local jurisdictional boundaries.

Efforts to collect data and gather feedback on needs ensures that the County focuses its CDBG-DR award within the areas and priority projects which will have the greatest impact on the County's recovery, resilience, and future growth, while also addressing timely expenditure requirements of the CDBG-DR grant.

Regarding infrastructure systems affected by Hurricanes Sally and Zeta, the County noted through its data collection and engagement that the greatest need for infrastructure recovery included improvements to roads, bridges, water control facilities (including wastewater treatment and drinking water treatment), public buildings, public utilities, and recreational facilities (including beaches, parks, and other recreational areas). The immediate recovery efforts were well-documented by initial FEMA PA project worksheets, and, as noted within the Unmet Needs and Mitigation Needs Assessments, were analyzed to assess the specific infrastructure impacts from Hurricanes Sally and Zeta.

Due to the substantial infrastructure recovery needs on both the local jurisdiction level and County-wide level, the County will administer two infrastructure programs:

1. Local Government Recovery Infrastructure Program (LGRIP): A subrecipient awarded and implemented program.

2. County Priority Infrastructure Program (CPIP): A program for the prioritization of the County's disaster recovery projects, which will be administered and implemented by the County.

4.5.4 LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP)

4.5.4.1 Activity Description

The LGRIP focuses on assisting local governments and tribal communities in their infrastructure recovery needs. The County will approve CDBG-DR funding under this program for the following primary activities:

- Sewer and Drainage Improvements: Making (repairing or constructing) sewer and drainage improvements that have a storm-related (Hurricanes Sally and/or Zeta) impact and tie-back.
- Roadway Improvements: Making (repairing or constructing) road improvements to State and local roads and highways which were damaged as a result of the storms or were deemed impassible during evacuation efforts during Hurricanes Sally and/or Zeta (roadways must have a storm-related impact and tie-back).

LGRIP may also consider providing funding for infrastructure projects which include the following activities:

- Repairing damages to or rebuilding structures or recreational facilities damaged by Hurricanes Sally or Zeta.
- Providing elevation and mitigation measures to address failures of function during Hurricanes Sally or Zeta.
- Hardening existing structures or infrastructure to prevent damage from future disasters, including but not limited to, projects related to drainage improvements or water treatment improvements.

Method of Distribution

Under the LGRIP, the County will award funds to subrecipients (local municipalities – cities, towns, and utility districts – as well as tribal organizations) on a direct award basis via an application submission process. LGRIP will allocate CDBG-DR funding to subrecipients to implement their awarded projects.

While further described within the sections below, the County will review submitted projects for key criteria, including whether projects:

- Are "shovel-ready" (permits, environmental clearance completed, etc.);
- Require "substantial, leveraged" funding (i.e., CDBG-DR funding above \$1 million and combined with other funding sources as part of a large-scale infrastructure project); and
- Can be completed in an accelerated timeframe as prescribed by the County within the program's guidelines.

4.5.4.2 National Objective

In accordance with 24 CFR 570.483 and alternative requirements under the Federal Register allocation notices (87 FR 6364 and 87 FR 31636, respectively) as prescribed by ADECA's Action Plan, the LGRIP will have activities which meet one of the following national objectives:

- *Benefiting low- and moderate-income persons ("LMI national objective"):*
 - Area benefit activities – An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low- and moderate-income persons.
 1. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity.
 2. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion.
 3. Other exceptions to area benefit determinations may apply as outline under the Federal Register allocation notices.
 - Limited clientele activities – An activity which benefits a limited clientele, at least 51 percent of whom are low- and moderate-income persons.
- Activities designed to meet community development needs having a particular urgency ("Urgent Need national objective"):
 - As prescribed by the Federal Register allocation notices, the HUD Secretary has waived the urgent need national objective criteria in section 104(b)(3) of the HCDA and establishes alternative requirements for this national objective. Subrecipient activities which propose the urgent need national objective must meet all three criteria below:
 1. Describe why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community.
 2. Identify each proposed activity that must utilize the urgent need national objective because a low- and moderate-income national objective cannot be utilized.
 3. Document how each activity funded under the urgent need national objective responds to the urgency, type, scale, and location of the disaster-related impact as described within this Local Recovery Plan.

The County will prioritize LMI projects over projects that will meet an Urgent Need national objective as prescribed within ADECA's Action Plan. The documentation for supporting an Urgent Need national objective must also have direct applicability to the Unmet Needs Assessment. Infrastructure program activities can meet the use of Urgent Need national objective if they occur within the County's areas that were impacted by Sally and Zeta as outlined within the Unmet Needs Assessment.

4.5.4.3 Eligible Activity

Infrastructure repair and improvements are considered an eligible activity in accordance with 42 USC 5305(a)(2) and Section 105(a)(2) – Construction/reconstruction of public facilities and improvements – of the Housing and Community Development Act of 1968 (“HCDA”), which authorizes the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.

As noted above, primary subrecipient activities will include:

- Sewer and drainage improvements (including resulting work, e.g., road reconstruction, due to sewer and drainage construction), and
- Roadway improvements (including medians and other structures, e.g., signage and drainage, in relation to roadway construction).

When reviewing projects for project completion timing and funding feasibility, the County has determined not to fund similar drainage-type improvements that include the following activities:

- Dredging of canals, ditches, or other water passageways,
- Removal of vegetation growth in canals, ditches, or other water way types; and
- General debris removal.

When reviewing projects for project completion timing and funding feasibility, the County has also determined not to fund roadway-type improvements which include the following activities:

- Inclusion of walkways,
- Inclusion of bike paths, or
- Other improvements that do not improve general traffic flow and ingress/egress during times of evacuations.

Additionally, the County is required, as part of the grant, to have at least 15 percent of its allocation support disaster recovery related mitigation activities. As a result, the County will encourage subrecipients to include some measure of mitigation and resilience outcomes within its projects.

4.5.4.4 Eligible Costs

The following subrecipient costs related to the development and implementation of sewer and drainage and roadway improvement projects are considered eligible under the LGRIP:

- Project management (including hiring of consultants to comply with CDBG-DR regulations and grant requirements),
- Planning and design fees associated with the construction,
- Construction management and project inspections,

- Acquisition and permitting fees, as applicable, and
- Construction (labor and materials) costs.

The County may also consider a subrecipient’s request for payment of indirect costs, in accordance with negotiated cost rates or the federal de minimis rate, for local jurisdictions, as identified under 2 CFR 200.332(a)(4). Additionally, in accordance with 24 CFR 570.200(h), alternative requirements outlined within the Federal Register allocation notices, and as stated within ADECA’s action plan, pre-award costs of the type identified above may be eligible for reimbursement by the County if the subrecipient can demonstrate local funding (or loans) was utilized to pay those costs up front. Other requirements, such as environmental review and approval of incurring those costs, may apply.

4.5.4.5 Eligibility Criteria

Local municipalities and tribal organizations must meet the following minimum criteria for selection by the County to receive and implement an LGRIP award:

- An awarded subrecipient must meet an eligible activity as described in the Eligible Activity section above and must establish their activity as a disaster recovery effort (“tie-back” to the storms).
- Subrecipients must design and construct all newly constructed infrastructure that is assisted with CDBG–DR funds to withstand extreme weather events and the impacts of climate change. This includes incorporating mitigation measures and resilient elements and design as construction standards within the project. In addition to this requirement, subrecipients must comply with applicable state, local, and tribal codes, and standards for floodplain management, including elevation, setbacks, and cumulative substantial damage requirements.
- Infrastructure facility and other improvement projects, assisted with CDBG–DR funds, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above the 100-year (or one percent annual chance) floodplain.
- Subrecipients will be expected to demonstrate capacity to manage roadway or drainage improvement projects while complying with federal compliance standards. This may include bringing on a consultant team to enable capacity and additional support.
- While there is no limit on the number of applications a subrecipient can submit or award maximum, the minimum award for assistance is \$750,000.

Entities must also comply with Duplication of Benefits (DOB) requirements, must demonstrate the capacity to perform within the program’s performance period and milestones, and are in good standing with the County and are not debarred from receiving federal funds. Since HUD identified all of Baldwin County as a Most Impacted and Distressed (MID) area, all subrecipient projects are presumed to meet the MID requirement.

4.5.4.6 Tieback to the Storm

Subrecipients can establish tie-back to the storms using the following descriptions:

- How Sally or Zeta impacted the performance of the roadway or drainage system at time of the storm;
- The resulting, quantitative effects of the storm on roadways and sewage and drainage systems;
- Addresses the increased impact that the performance failure of roadways, sewage, or drainage had on areas with large LMI communities; and
- Addresses how improvements will positively impact the community during future disasters and reduce levels of damage sustained by the community.

4.5.4.7 Program Priorities

Due to the limited timeframe to expend CDBG-DR dollars and implement projects, the County intends to incorporate additional prioritization criteria for awarding subrecipient projects to ensure all infrastructure recovery efforts meet grant expenditure requirements. As part of selecting prioritization criteria The County outlines an initial set of criteria for establishing prioritization for the LGRIP awards below.

The County will give high-priority to “shovel-ready” projects. These projects typically meet the following criteria:

- The subrecipient has demonstrated capacity to efficiently administer a project with federal funds.
- The subrecipient can support the administration of construction projects with a turn-around time of 12 – 18 months.
- Projects have all required permits necessary to start construction.
- Environmental reviews are either underway or have been completed, reviewed, and approved.
 - Additional prioritization for subrecipient projects which have environmental clearance at the time of subrecipient application submission and/or County review.
- The subrecipient’s project has completed construction design, e.g., plans and specifications, necessary to complete the project.
- The subrecipient is prepared to start the procurement process for soliciting a construction contractor.

In addition to prioritizing “shovel-ready” projects, the County will also focus on selecting subrecipient project applications which have the following criteria for sewer, drainage, and roadway improvement projects (the County will also use the following criteria for prioritizing other eligible activity projects identified above outside of sewer, drainage, and roadway improvement projects):

- The subrecipient intends to utilize CDBG-DR funding as leverage to fund a project budget gap necessary for the project to be constructed;

- Subrecipients can provide support documentation to show a project will meet the LMI national objective;
- Subrecipients can demonstrate that an infrastructure project benefits an historically underserved community that has lacked adequate investments in transportation, water, and wastewater infrastructure prior to the disaster;
- Subrecipients can provide an operations and maintenance plan for utilizing local funding to ensure the continued operation of the infrastructure project for at least five years after completion, as applicable;
- Subrecipients have a demonstrated capacity to manage infrastructure projects to completion within 12 months or less; and
- Subrecipient projects which include mitigation measures and resilience outcomes.

4.5.4.8 Feasibility

As alluded to under the prioritization criteria, timing considerations hold as much regard to prioritizing project as does funding considerations. Under the LGRIP, the County requires subrecipients to submit professional (i.e., engineer- or architect-provided) project schedules and timelines which will outline the “shovel readiness” of each project.

Other “shovel-ready” considerations for both County and subrecipient projects which would indicate accelerated construction activity completion include:

- Approved environmental clearances;
- Approved design plans;
- An ability by the subrecipient to hold on tacking choice limiting actions, e.g., hiring a construction company or any activities that could be deemed “hard costs”; and
- Has completed all permit approval processes.

In meeting these criteria, the subrecipient can assure that projects are able to meet the project closeout deadline. This will allow the County to complete the program closeout process by the agreement deadline, as identified within the County’s agreement with ADECA.

Additionally, CDBG-DR projects funded by the County will need to ensure compliance with all cross-cutting requirements throughout the project life. This may require the County and awarded subrecipients to review completed actions and determine if it satisfies all federal requirements. For subrecipients who were awarded CDBG-DR funding but exhibit a low capacity to implement their project(s), the County will prioritize capacity building efforts (e.g., training, individual technical assistance and LGRIP onboarding sessions) to ensure project completion concerns and risks are mitigated. This could require the subrecipient to complete due diligence actions as a condition of receiving the award, as determined by the County. The subrecipient will have an opportunity to reach out to the County and receive assistance on what actions may be required for program participation and compliance.

4.5.4.9 Budget

The County has determined that it will allocate \$13,362,253, or 55 percent of the infrastructure program budget, towards subrecipients who show capacity to manage federally funded infrastructure recovery projects.

Budget Category	Funding Level
Subrecipients (LGRIP)	\$13,362,253.00

4.5.4.10 Timeline and Readiness

The County will select subrecipients through a competitive application process. Below is the timeframe by which the County will accept subrecipient applications, award CDBG-DR funding, and expect projects to be completed and ready for closeout.

Program Development Action	Estimated Timeline
Notification of Funding Availability (NOFA)	60 days after LRP approval
Application Review	90 days after LRP approval
Application Awards and Subrecipient Agreement Completion	120 days after LRP approval
Project Commencement	Within 30 days of Subrecipient Agreement
Project Completion	March 2026
Program Closeout	May 2026

4.5.4.11 Partners

The County does not anticipate entering into any partnerships with other entities to help administer this program. The County will only allow subrecipients under this program to have the primary responsibility for carrying out eligible activities under the LGRIP. As noted above, the County reserves the right to more extensively collaborate with smaller local municipalities that are unable to manage a project on its own but can demonstrate the need for the project and are unable to obtain necessary funding.

4.5.5 COUNTY PRIORITY INFRASTRUCTURE PROGRAM (CPIP)

4.5.5.1 Activity Description

The CPIP allows the County to address and prioritize recovery needs that have a larger, and in some cases county-wide, impact. The County’s Grant Department has reached out to various County departments (Highway Department, Emergency Management Agency, Communication & Information Systems, among others) to identify recovery projects which can benefit from the leveraging of CDBG-DR funding. Additionally, Baldwin County anticipates fielding potential infrastructure disaster recovery project funding needs from other County-wide agencies (e.g., Baldwin County School District), which it may consider for a CPIP award.

Examples of project types identified by the County’s Departments include:

- Road improvements
- New roadways
- Drainage improvements
- Safe rooms
- Flood control structure(s) development
- Public facilities repair and reconstruction
- Broadband infrastructure improvements

The County Commission will review, assess, and prioritize county projects for CDBG-DR funding through the CPIP.

Method of Distribution

The County will solicit infrastructure recovery projects from County Departments to determine potential recovery needs outside of local municipality jurisdictions. This list will be organized by project type, project status (i.e. planning, design, permitting, under construction, construction completed), total funding, and unmet funding needs. The County anticipates the Commission will select between three and seven projects for CPIP awards. These projects will be selected according to the County's priorities and feasibility criteria.

County projects which can reasonably address the infrastructure recovery needs of the County will be prioritized during the life of the County's grant with ADECA. The County reviewed unmet infrastructure needs across Baldwin County and will consult the approved project priority list to determine which projects will be funded with CDBG-DR dollars.

4.5.5.2 National Objective

In accordance with 24 CFR 570.483 and alternative requirements under the Federal Register allocation notices (87 FR 6364 and 87 FR 31636, respectively) as prescribed by ADECA's Action Plan, the CPIP will have activities which meet one of the following national objectives:

- *Benefiting low- and moderate-income persons ("LMI national objective"):*
 - *Area benefit activities* – An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low- and moderate-income persons.
 1. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity.
 2. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion.
 3. Other exceptions to area benefit determinations may apply as outline under the Federal Register allocation notices.
 - *Limited clientele activities* – An activity which benefits a limited clientele, at least 51 percent of whom are low- and moderate-income persons.
- *Activities designed to meet community development needs having a particular urgency ("Urgent Need national objective"):*
 - As prescribed by the Federal Register allocation notices, the HUD Secretary has waived the urgent need national objective criteria in section 104(b)(3) of the HCDA and establishes alternative requirements for this national objective. County activities which propose the urgent need national objective must meet all three criteria below:

1. Describe why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community.
2. Identify each proposed activity that must utilize the urgent need national objective because a low- and moderate-income national objective cannot be utilized.
3. Document how each activity funded under the urgent need national objective responds to the urgency, type, scale, and location of the disaster-related impact as described within this Local Recovery Plan.

The County will prioritize LMI projects over projects that will meet an Urgent Need national objective as prescribed within ADECA's Action Plan. The documentation for supporting an Urgent Need national objective must also have direct applicability to the Unmet Needs Assessment. Infrastructure program activities can meet the use of Urgent Need national objective if they occur within the County's areas that were impacted by Sally and Zeta as outlined within the Unmet Needs Assessment.

4.5.5.3 Eligible Activity

Infrastructure repair and improvements are considered an eligible activity in accordance with 42 USC 5305(a)(2) and Section 105(a)(2) – Construction/reconstruction of public facilities and improvements – of the HCDA, which authorizes the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.

As noted above, the County's priority projects will fall within the following areas:

- Road improvements
- New roadways
- Drainage improvements
- Safe rooms
- Flood control structure(s) development
- Public facilities repair and reconstruction
- Broadband infrastructure improvements

As part of a project completion timing and funding feasibility review, the County has determined not to fund the following activities under the CPIP:

- Dredging of canals, ditches, or other water passageways,
- Removal of vegetation growth in canals, ditches, or other water way types;
- Emergency management plans; and
- General debris removal.

Additionally, the County is required, as part of the grant, to have at least 15 percent of its allocation support disaster recovery related mitigation activities. As a result, the County will seek to include some measure of mitigation and resilience outcomes within its projects; however, the

County Commission may select a project which is considered a stand-alone, or mitigation only, activity.

4.5.5.4 Eligible Costs

The following County costs related to the development and implementation of approved, priority projects are considered eligible under the CPIP:

- Project management (activity delivery) by specific County Department staff (including hiring of consultants to comply with CDBG-DR regulations and grant requirements),
- Planning and design fees associated with the construction,
- Construction management and project inspections,
- Acquisition and permitting fees, as applicable, and
- Construction (labor and materials) costs.

In accordance with 24 CFR 570.200(h), alternative requirements outlined within the Federal Register allocation notices, and as stated within ADECA's action plan, pre-award costs of the types identified above may be eligible for reimbursement if County staff can demonstrate local funding from other County commitments was utilized to pay those costs up front. Other requirements, such as environmental review and approval of incurring those costs, may apply.

4.5.5.5 Eligibility Criteria

The County's projects will meet the following minimum criteria for selection of a CPIP award:

- Meet an eligible activity as described in the Eligible Activity section above and must establish their activity as a disaster recovery effort ("tie-back" to the storms).
- Design and construct all newly constructed infrastructure that is assisted with CDBG-DR funds to withstand extreme weather events and the impacts of climate change. This includes incorporating mitigation measures and resilient elements and design as construction standards within the project.
 - In addition to this requirement, construction projects must comply with applicable state, local, and tribal codes, and standards for floodplain management, including elevation, setbacks, and cumulative substantial damage requirements.
- Infrastructure facility and other improvement projects, assisted with CDBG-DR funds, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard and County, up to at least two feet above the 100-year (or one percent annual chance) floodplain.

CPIP projects must also comply with Duplication of Benefits (DOB) requirements, must demonstrate the capacity to perform within the program's performance period and milestones, and are in good standing with the County and other local funding sources have not been committed to the project budget. Since HUD identified all of Baldwin County as a Most Impacted and Distressed (MID) area, all subrecipient projects are presumed to meet the MID requirement.

4.5.5.6 Tieback to the Storm

The County projects can establish tie-back to the storms using the following descriptions:

- How Sally or Zeta impacted the performance of the County's improvement project at time of the storm;
- The resulting, quantitative effects of the storm on the applicable projects which the County selects for funding;
- Addresses the increased impact that the performance failure of roadways, sewage, or drainage had on areas within the County as well as applicable large LMI communities; and
- Addresses how improvements will positively impact the community during future disasters and reduce levels of damage sustained by the community.

4.5.5.7 Program Priorities

Due to the limited timeframe to expend CDBG-DR dollars and implement projects, the County intends to incorporate additional prioritization criteria for awarding priority projects within the list provided by County Departments. As mentioned within the Methods of Distribution section, the County Commission will establish additional prioritization criteria as needed to select projects.

The County's priority project selection process will generally center around projects which can meet an eligible activity, national objective, and have storm tie-back. Projects which were also established needs as outlined with the Baldwin County Strategic Plan, Baldwin County Master Plan, Multi-Hazard Jurisdictional Hazard Plan, and Future Land Use planning will be considered for this program.

Once the County has ordered the projects into priorities, the County will review the projects to determine if they meet the following feasibility criteria to make final determinations:

- Shovel-ready projects;
- Projects under constructions;
- Appropriate level of leveraged funding, where applicable; and
- Public support.

4.5.5.8 Feasibility

As alluded to under the prioritization criteria, timing considerations hold as much regard to prioritizing project as does funding considerations. Under the LGRIP, the County requires subrecipients to submit professional (i.e., engineer- or architect-provided) project schedules and timelines which will outline the "shovel readiness" of each project.

Other "shovel-ready" considerations for both County and subrecipient projects which would indicate accelerated construction activity completion include:

- Approved environmental clearances;
- Approved design plans;

- An ability by the subrecipient to hold on tacking choice limiting actions, e.g., hiring a construction company or any activities that could be deemed “hard costs”; and
- Has completed all permit approval processes.

In meeting these criteria, the subrecipient can assure that projects are able to meet the project closeout deadline. This will allow the County to complete the program closeout process by the agreement deadline, as identified within the County’s agreement with ADECA.

4.5.5.9 Budget

The County has determined that it will allocate \$10,762,373 towards infrastructure improvements throughout the County. This represents approximately 45 percent of the infrastructure program budget for priority projects directly managed by County and County departments under the CPIP.

Budget Category	Funding Level
County (CPIP)	\$10,762,373.00

4.5.5.10 Timeline and Readiness

The County will select subrecipients through a competitive application process, below is the timeframe by which the County will accept applications, award funds, and expect projects to be completed and ready for closeout.

Program Development Action	Estimated Timeline
Identification of County Projects	30 days after LRP approval
Project Review	60 days after LRP approval
Commission Approval and Interagency Agreement Completion	90 – 120 days after LRP approval
Project Commencement	Within 30 days of Interagency Agreement
Project Completion	March 2026
Program Closeout	May 2026

4.5.5.11 Partners

The County’s Grant Department will have management and oversight over the CDBG-DR dollars. As part of the CPIP, the Grant Department staff will sign Interagency Agreements with other County departments and agencies to manage, administer, and implement County projects. The County reserves the right to collaborate with other County agencies, as needed, to ensure that they can manage and implement a project in accordance with the CDBG-DR grant funding requirements on its own but can demonstrate the need for the project and is unable to obtain necessary funding.

4.6 Program Income

Program income are funds generated by federally funded activities. In the event a program or project involves program income, the County shall develop and adopt policies and procedures in

alignment with ADECA policy requirements for reporting and retaining any program income earned.

These amounts will be recorded and tracked in the County's grant accounting and reported to ADECA on a regular basis. Program income may only be used for eligible project or administration costs related to the awarded project before additional grant dollars are expended. The County will not draw down additional grant funds until all program income has been expended. Program income will be treated as additional CDBG-DR funds subject to the requirements of the applicable Federal Register Notice and will be used in accordance with ADECA's requirements. If any program income remains at program closeout, the County will return these funds to ADECA.

4.7 Resale or Recapture

A CDBG-DR award recipient may be required to repay all, or a portion of the funds received. The reasons for recapture include, but are not limited to, the following:

- An applicant is determined to have provided false or misleading information to the County,
- An applicant withdraws from the program prior to completion of the project,
- An applicant does not complete construction,
- An applicant does not report the receipt of additional insurance, SBA, FEMA, non-profit assistance, and/or any other DOB received after calculation of the award, and/or
- An applicant voluntarily or involuntarily relinquishes ownership of the property prior to the successful completion of a final program inspection.

The County shall establish resale or recapture requirements for programs funded and shall outline those requirements in the program policies and procedures, including how the provisions will be enforced (whether by recorded deed restrictions, covenants, or other similar mechanisms).

Obligations and means of enforcement for non-housing programs will vary depending on the nature of the recipient (i.e., public, or private entity), purpose, and amount of funds; all of which are subject to federal and state laws, regulations, and terms and conditions associated with the grant.

Housing programs providing assistance to direct beneficiaries will require the applicant to enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, after an award is issued, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

5 Appendix

5.1 Infrastructure Survey Responses

Table 71: Baldwin County Infrastructure Survey for Jurisdictional Infrastructure Recovery Needs

Jurisdiction	Project Type	Project Name	Description	Census Tract, if known	Project Budget	Current Funding	Project Status	Estimated Timeline	Environmental Review Complete?
City of Orange Beach	Debris Removal	Debris Removal Reimbursement- Vessels, Leaners, Hangars	The City of Orange Beach paid for 21 vessels to be removed from the waterways and FEMA Public Assistance denied most of the reimbursement request. The City also removed leaning trees and hanging limbs from rights-of-way that FEMA declared ineligible and has since changed policy and it would be eligible. The City is requesting the difference between what FEMA paid- only \$309,489.79 and the remaining balance owed- \$1,302,197.03.	114.18, 114.17, 114.14, 114.15,	1,302,197.03	\$ -	Complete	Project is complete.	Yes
City of Bay Minette	Drainage	Red Hill Road Extension and Drainage Improvement Plan	The proposed project would extend Red Hill Road to a new intersection with AL 59. Currently, the existing culvert has a reduced capacity due to it silting in. This siltation is caused by stormwater in the area not having any place to go. An added benefit to improving the drainage would be the surrounding land could be developed in the future thus providing economic growth to the City of Bay Minette.	105 and 103	2,120,000.00	250,000.00	In Design	The project timeline is dependent on receiving grant funding.	No
City of Robertsdale	Drainage	Storm Drainage	Hwy 90 at Rock Valley Project		474,291.20	\$ -	In Design	18 Mos	No
City of Robertsdale	Drainage	Storm Drainage	Carolina Street Storm Drainage		512,000.00	\$ -	Not Started	18 Mos	No
City of Robertsdale	Drainage	Storm Drainage	Fountain Street Storm Drainage		448,000.00	\$ -	Not Started	18 Mos	No

Town of Magnolia Springs	Drainage	Magnolia Springs Drainage Improvements	The Town of Magnolia Springs was made aware of significant drainage issues throughout the Town during and after the Hurricane Sally event. The Town commissioned a comprehensive town-wide drainage study to identify issues. The study identified multiple locations within the Town that need to be addressed.		1,669,445.51	\$ -	Planning	With funding not identified, the Town plans to complete the entire drainage project within 5-10 years.	No
City of Fairhope	Facilities	American Legion Post 199 Historical Building Reconstruction	Reconstruct American Legion Post 199 Historical Building destroyed by Hurricane Sally		5,800,000.00	375,000.00	In Design		No
Baldwin County EMA	Facilities	EOC Expansion/Renovation	Expand Operations floor, add office wing			\$ -	Not Started	24 Mos	No
Baldwin County EMA	Facilities	EMA Warehouse	≥ 25,000 Ft2 w/4 tractor-trailer loading bays			\$ -	Not Started	18 Mos	No
Perdido Bay Water Sewer and Fire Protection District	Facilities	Maintenance Barn	Re-build maintenance barn for field work are and storage of materials used in the daily operations of the system.		500,000.00	\$ -	In Design		Yes
City of Orange Beach	Facilities	Safe Room-Local Match	The City of Orange Beach is waiting for obligation from FEMA's Hazard Mitigation Grant Program (4563 Hurricane Sally) to construct a Safe Room for first responders. The City has not yet budgeted the project but the total estimate is \$5,078,683.76, therefore the 10% local match would be approximately \$507,868.	114.11	507,868.00	4,570,815.38	Planning		Yes
City of Robertsdale	Flood prevention	Sewer Pump Station Back up Pump System	Emergency BackUp Sewer Pumps		470,000.00	\$ -	Not Started	18 Mos	No
Baldwin County Highway	Flood prevention	Magnolia River Watershed Constructed Wetlands and Regional Detention - Kelly Pit	This project will convert existing borrow pits into constructed wetlands and regional detention ponds to improve water quality and mitigate flooding in the Magnolia River Watershed	114.1	17,000,000	4,000,000.00	In Design		Yes

City of Gulf Shores	Flood prevention	Cotton Creek Stream Restoration	<p>Reach 1B Stream Stabilization: It is recommended to stabilize approximately 600 linear feet of stream along reach 1B.</p> <p>Reach 1C Bank Stabilization and Vegetative Buffer It is recommended to perform bank stabilization along 1200 linear feet of reach 1C.</p> <p>Reaches 1B, 1C and 1D Deadfall Removal It is recommended that the deadfall be removed in the wooded riparian zones along reaches 1B, 1C and 1D to prevent future degradation caused by channel blockages.</p> <p>Invasive Species Removal Every reach within Phase I exhibited invasive species abundance of at least 50%. An invasive species management plan is recommended for Phase I.</p> <p>Phase I Targeted Management: An adaptive management approach for the transition from the natural channel to open fairways is recommended to minimize excessive erosion and scour downstream.</p>		8,757,500	\$ -	Planning	Funding dependent, design/permitting can begin in late 2024.	No
City of Orange Beach	Road repairs/improvement	Grants Manager/Coastal Resources Deputy Director	Jubilee Point Road Elevation- design and construction	114.15	500,000	\$ -	Planning	Project could be started as soon as funds are allocated.	No
Baldwin County Highway	Road repairs/improvement	County Road 65 Extension from CR-28 to CR-32	<p>The Project includes the extension of the CR-65 corridor to improve safety, increase capacity, and support economic competitiveness in the region.</p> <p>CR-65 is a hurricane evacuation route for Baldwin County and is critical to quickly and safely allow citizens and visitors to evacuate when needed. This project will improve roadway resiliency and will also address redundancy, strengthening north-south routes in the area.</p>	110	6,250,000.00	500,000.00	In Design		Yes
Baldwin County Highway	Road repairs/improvement	County Road 65 Extension from CR-34 to CR-36	<p>The Project includes the extension of the CR-65 corridor to improve safety, increase capacity, and support economic competitiveness in the region.</p> <p>CR-65 is a hurricane evacuation route</p>	110	3,200,000.00	200,000.00	In Design		Yes

			for Baldwin County and is critical to quickly and safely allow citizens and visitors to evacuate when needed. This project will improve roadway resiliency and will also address redundancy, strengthening north-south routes in the area.						
East Central Baldwin County Water, Sewer and Fire Protection Authority	Water and Sewer Improvements	CR-34 to CR-32 along BBE	It is proposed to install a 8" PVC water main along the Baldwin Beach Express from Baldwin County 32 to County Road 34. Connections will be made to existing water mains on each end of the proposed line, and polyethylene pipe will be directional drilled under the existing streams. Fire hydrants will be installed as required to flush the proposed line. Valves will be installed on each side of the directionally drilled P.E. such that the lines can be isolated in the event of problems under the creeks.		623,400.00	\$ -	Designed, applied for ADEM grant but have not received an answer.	Depends solely on availability of funding	No
City of Loxley	Water and Sewer Improvements	Water System Capacity Expansion for the City of Loxley	The project includes the construction of an 1,000,000 gallon elevated water storage tank within the City's north water system to service its customers on the west side of Fish River and north of Interstate-10. The City currently supplies water to the west side of Fish River through a single 12-inch water main from the Industrial Park Drive elevated water tank on the east side of Highway 59. This 12-inch main dead-ends at both Jenkins Pit Road and the intersection with Highway 31. In addition, the 12-inch water main and elevated water tank at Industrial Park Drive is supplied by a single booster pump station. This booster pump station has no redundancy and is limited in capacity. The construction of the elevated tank would be situated along the existing 12-inch water main and would provide the redundancy and reliability needed by the system to continue to serve the existing industrial, commercial and residential customers as well as accommodate three (3) known future schools and various new industrial and residential developments.	0107.08	5,550,000	\$ -	Planning	TBD	No

East Central Baldwin County Water, Sewer and Fire Protection Authority	Water and Sewer Improvements	Woerner Road 6" Water Line relocation Phase I	Relocate 1 mile of 6" Water Main from CR-87 to CR-83 in preparation for County to Pave Woerner Rd		323,183.00	\$ -	Planning	TBD	No
East Central Baldwin County Water, Sewer and Fire Protection Authority	Water and Sewer Improvements	Woerner Road 6" Water Line relocation Phase II	Relocate 1 mile of 6" Water Main from CR-83 to E.O.M. in preparation for County to Pave Woerner Rd		350,000.00	\$ -	Planning	TBD	No
City of Robertsdale	Water and Sewer Improvements	Sewer Rehab Project	Sewer Rehab Project		4,806,700.80	\$ -	Planning	18 Mos	No
Poarch Band of Creek Indians	None	None at this time.	There were no projects as a result of either Hurricane Sally or Zeta at our OWA property.		N/A	N/A	N/A	N/A	N/A
City of Foley	Flood prevention	Hickory Street Regional Detention	18 acre regional detention pond to help protect Magnolia Circle, Hickory Street residences and businesses along US 98	115.01	2,000,000.00	\$ -			No
City of Foley	Drainage	Juniper Street Drainage & Sidewalk Installation	Add enclosed drainage network and a sidewalk on east side of Juniper Street from US 98 to Pride Boulevard to reduce flooding in the corridor	115.04	850,000.00	\$ -			No
City of Foley	Drainage	Turkey Branch/UT BSR Drainage Cleanout	Highway 59 to River road and Turkey Branch crossing County and City jurisdiction. The removal of vegetative storm water debris caused by Hurricane Sally. The debris is restricting stormwater from being able to flow downstream to the Bon Secour River causing flooding upstream.	115.03	1,250,000.00	\$ -	Planning		Yes
City of Foley	Drainage	Drainage Pipe Enhancement - Oak Street	Removal and replacement of dilapidated pipe; this area encompasses the headwaters to the Bon Secour River; As pipes fail the area has flooding at the Foley Middle School and lower income neighborhoods.	115.03 & 115.04	2,750,000.00	\$ -	Not started		No
City of Foley	Flood prevention	Magnolia River at Airport - Stream Restoration	Bank stabilization and increased retention of the Magnolia River North of the Foley airport. The riverbank was heavily eroded due to the volume and velocity during hurricane Sally which	115.01	2,500,000.00	\$ -	Planning		No

			caused flooding to the downstream low income community. This project will increase the resilience from future storm events and reduce pollutant loading in the outstanding Alabama Water (Magnolia River).						
City of Foley	Water and Sewer Improvements	Beulah Heights Infrastructure, Improvement, & resilience - Phase 3	This area has been prone to flooding since Hurricane Sally. It also has failing septic tanks due to previous lack of access to sewer. This project will enhance and restore storm water drainage systems throughout the community to increase resilience from future storm events. It will also provide low to moderate income citizens with access to the sewer system which will reduce pathogens in Wolf Creek (OAW).	115.04	2,600,000.00	\$ -	Planning		No
City of Foley	Drainage	Drainage Pipe Enhancement - Co. Rd. 12 @ Meadow Run	Enhancement of drainage pipes along Co. Rd. 12; Area has issues with metal pipes of limited capacity; the area drains into a drainageway from the north encompassing urban and low income residential areas resulting in flooding upstream and at County Road 12.	115.03	1,500,000.00	\$ -	Not started		No
City of Foley	Drainage	Downtown Neighborhood Streetscape Revitalization Program	The City of Foley proposes a \$600,000 Downtown Neighborhood Streetscape Revitalization Program, primarily focusing on critical drainage improvements and enhancing community resilience against storms and hurricanes, with a particular emphasis on benefiting low to moderate-income residents.	115.03	600,000.00	\$ -	Not started		No

5.2 Summary and Response of Public Comments

To be added after public comment period

5.3 Baldwin County Transportation, Utility, and Critical Facilities Inventory

Table 72: Baldwin County Government Facilities Inventory

Facility	Address	City	Zip
Alabama Dept Transportation	47450 Rabun Rd	Bay Minette	36507
Alabama DOT	19800 State Highway 59	Summerdale	36580
Alabama Marine Police	27559 Perdido Beach Blvd	Orange Beach	36561
Baldwin County Court House	1 Courthouse Sq	Bay Minette	36507
Baldwin County Health Dept	257 Hand Ave	Bay Minette	36507
Baldwin County Health Dept	23280 Gilbert Dr	Robertsdale	36567
Baldwin County Highway Dept	22220 West Blvd	Silverhill	36576
Baldwin County Jail	200 Hand Ave	Bay Minette	36507
Baldwin County Transportation	18100 County Road 54	Robertsdale	36567
Baldwin County Welfare	1705 S Us Highway 31	Bay Minette	36507
Bay Minette City Hall	301 Dolive St	Bay Minette	36507
Daphne City Hall	1705 Main St	Daphne	36526
Daphne City Jail	1502 Us Highway 98	Daphne	36526
Elberta Town Hall	13052 Main St	Elberta	36530
Fairhope City Hall	555 s Section St	Fairhope	36532
Foley City Hall	407 East Laurel Ave	Foley	36535
Foley Municipal Court	200 E Section Ave	Foley	36535
Gulf Shores City Hall	2149 W 1st St	Gulf Shores	36542

Gulf Shores Court Clerk	1905 W 1st St	Gulf Shores	36542
Loxley Town Hall	1089 S Hickory St	Loxley	36551
Loxley Town Municipal Court	2131 E Relham Ave	Loxley	36551
Magnolia Springs Town Hall	12191 Magnolia Springs Hwy	Magnolia Springs	36555
Orange Beach City Hall	4099 Orange beach Blvd	Orange Beach	36561
Perdido Beach Town Hall	9212 County Rd 97	Perdido Beach	36562
Robertsdale Town Hall	22647 Racine St	Robertsdale	36567
Silverhill Municipal Court	16150 Silverhill Ave	Silverhill	36576
Silverhill Town Hall	15965 Silverhill Ave	Silverhill	36576
Spanish Fort City Hall	7581 Spanish Fort Blvd	Spanish Fort	36527
Summerdale Town Hall	502 W Lee Ave	Summerdale	36580
Unemployment Tax Svc	200 W Michigan Ave	Foley	36535
US Post Office	601 McMeans Ave	Bay Minette	36507
US Post Office	808 Daphne Ave	Daphne	36526
US Post Office	6419 Bon Secour Hwy	Bon Secour	36511
US Post Office	6450 US Highway 90	Spanish Fort	36527
US Post Office	509 Fairhope Ave	Fairhope	36532
US Post Office	150 E Laurel Ave	Foley	36535
US Post Office	1059 S Holley St	Loxley	36551
US Post Office	70715 State Highway 59	Little River	36550
US Post Office	23336 County Road 47	Perdido	36562
US Post Office	17008 Scenic Hwy 98	Point Clear	36564
US Post Office	52925 Hodgson Rd	Stockton	36579
US Social Security Administration	368 Commercial Park Dr	Fairhope	36532

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

Table 73: Baldwin County Inventory of Public Safety Facilities Inventory

Facility	Address	City	Zip
Huggerlanding/Oyster Bay Volunteer Fire	198 S Ingleside Ave	Fairhope	36533
Huggerlanding/Oyster Bay Volunteer Fire	4590 CR 6	Gulf Shores	36542
Gateswood Volunteer Fire Dept	33014 St Hwy 112	Robertsdale	36567
Styx River Volunteer Fire Dept	23350 Dunbar Rd	Robertsdale	36567
Stapleton Fire Dept	36276 State Highway 59	Stapleton	36578
Bay Minette Fire - Rescue	300 N Hoyle Ave	Bay Minette	36507
Belforest Volunteer Fire Search & Rescue	25490 Hwy 54 W	Daphne	36526
Robertsdale Volunteer Fire Dept	22575 St. Paul St	Robertsdale	36567
Silverhill Volunteer Fire Dept	22031 Sixth St	Silverhill	36576
Spanish Fort Fire Rescue	7580 Spanish Fort Blvd	Spanish Fort	36527
Summerdale Fire Dept	105 W Broadway Ave	Summerdale	36580
Fish River Marlow Fire & Rescue Dept	13355 CR 32	Summerdale	36580
Fort Morgan Volunteer Fire Dept	12105 Hwy 180 W	Gulf Shores	36542
Daphne Fire Dept	28280 N Main St	Daphne	36526
City of Foley Fire Dept	120 W Verbena Ave	Foley	36535
Bon Secour Volunteer Fire Dept	7392 Hwy 65	Bon Secour	36511
Elberta Volunteer Fire Dept	13120 Illinois St	Elberta	36530
Josephine Volunteer Fire Dept	6824 CR 95	Josephine	36530
Lillian Volunteer Fire Dept	34180 Widell Ave	Lillian	36549
Rabun Volunteer Fire Dept	47860 Rabun Rd	Bay Minette	36507
Barnwell Volunteer Fire & Rescue Dept	13319 CR 13	Fairhope	36532
Gulf Shores Fire Rescue	1921 W First St	Gulf Shore	36547
Orange Beach Fire & Rescue	25853 John Snook Dr	Orange Beach	36561
Magnolia Springs Fire Dept	14809 Gates Ave	Magnolia Springs	36555
Summerdale Police Dept	105 W Broadway St	Summerdale	36580
Daphne Police Dept	1502 Highway 98	Daphne	36526
Foley Police Dept	200 E Section Ave	Foley	36535
Loxley Police Dept	2139 E Relham Ave	Loxley	36551
Police Dept Records Div	220 Clubhouse Dr	Gulf Shores	36542

Silverhill Police Dept	22030 Sixth St	Silverhill	36576
Robertsdale Police Dept	22647 Racine St	Robertsdale	36567
Fairhope Police Dept	24 N Section St	Fairhope	36532
Orange Beach Police Dept	25855 John Snook Ave	Orange Beach	36561
Bay Minette Police Dept	300 N Hoyle Ave	Bay Minette	36507
Spanish Fort Police Chief	7581 Spanish Fort Blvd	Spanish Fort	36527
Sheriff-Civil Div Chief	1 Courthouse Sq	Bay Minette	36507
Baldwin County Sheriff	1100 Fairhope Ave	Fairhope	36532
Baldwin County Sheriff	201 E Section Ave	Foley	36535
Baldwin County Sheriff	18126 CR 54	Robertsdale	36567
Baldwin Sheriff	310 Hand Ave	Bay Minette	36507
Alabama Dept Transportation	47450 Rabun Rd	Bay Minette	36507
Alabama DOT	19800 State Highway 59	Summerdale	36580
Alabama Marine Police	27559 Perdido Beach Blvd	Orange Beach	36561

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

Table 74: Baldwin County School Inventory

Facility	Address	City	Zip
E J Carroll Intermediate School	1000 Main St	Daphne	36526
Fairhope Intermediate School	1101 Fairhope Ave	Fairhope	36532
Bay Minette Intermediate School	600 Blackburn Ave	Bay Minette	36507
Elberta Middle School	13355 Main St	Elberta	36530
Foley Intermediate School	2000 S Cedar St	Foley	36535
Spanish Fort Middle School	33899 Jimmy Faulkner Dr	Spanish Fort	36527
Fairhope Middle School	408 N Section	Fairhope	36532
Baldwin County Alternative School	6925 Twin Beech Rd	Fairhope	36532
Gulf Shores Middle School	450 E 15th Ave	Gulf Shores	36542
New Bay Minette Middle School	1131 W 13th St	Bay Minette	36507
Foley Middle School	201 N Pine St	Foley	36535
Central Baldwin Middle School	24545 State Hwy 59	Robertsdale	36576
Daphne Middle School	1 Jody Davis Cir	Daphne	36526
Robertsdale High School	1 Golden Bear Dr	Robertsdale	36567
Foley High School	1 Pride Pl	Foley	36535
Fairhope High School	18800 Greeno Rd	Fairhope	36532
Gulf Shores High School	600 E 15th Ave	Gulf Shores	36542
Daphne High School	9300 E Lawson Rd	Daphne	36526

Spanish Fort High School	1 Plaza Del Toros	Spanish Fort	36527
Baldwin County High School	1 Tiger Dr	Bay Minette	36507
South Baldwin Center for Technology	19200 Anderson Ln	Robertsdale	36567
North Baldwin Center for Technology	505 W Hurricane Rd	Bay Minette	36507
Bayshore Christian School	23050 US Hwy 98	Fairhope	36532
Berean Baptist Christian School	24070 US Hwy 98	Elberta	36530
Daphne Elementary North	2307 Main St	Daphne	36526
Elberta Elementary School	25820 US Hwy 98	Elberta	36530
Foley Elementary School	200 N Cedar St	Foley	36535
Rockwell Elementary	10183 US Hwy 31	Spanish Fort	36527
Spanish Fort Elementary	30900 State Hwy 225	Spanish Fort	36527
Gulf Shores Elementary	1600 E 3rd St	Gulf Shores	36542
Daphne East Elementary	26651 CR 13	Daphne	36526
Orange Beach Elementary	4900 Wilson Blvd	Orange Beach	36561
Christ the King Elementary	1503 Main St	Daphne	36526
Marietta Johnson School of Org.	8 Marietta Dr	Fairhope	36532
Open Door Christian School	20774 CR 12 S	Foley	36535
Fairhope K-1 Center	100 S Church St	Fairhope	36532
Eastern Shore Early Childhood	1090 Fairhope Ave	Fairhope	36532
Central Christian School	17395 Highway 104 W	Robertsdale	36567
Faith Presbyterian School	18632 Berner Rd	Robertsdale	36567
AL Gulf Coast Christian Academy	18930 CR 28	Foley	36535
Calvary Christian Learning Center	25550 Canal Rd	Orange Beach	36561
Bayside Academy PK-12	303 Dryer Ave	Daphne	36526
Cornerstone Preparatory School (PK-12)	6389 Spanish Fort Blvd	Spanish Fort	36527
Fairhope Primary School	2 N Bishop Rd	Fairhope	36532
Bay Minette Elementary	800 Blackburn Ave	Bay Minette	36507
Magnolia School	1 Jaguar Loop	Foley	36535
Delta Elementary	10251 White House Fork Rd	Bay Minette	36507
Silverhill Middle	15800 4th Ave	Silverhill	36576
Robertsdale Elementary	19150 Wilters St	Robertsdale	36567
Rosinton Elementary	19757 CR 64	Robertsdale	36567
Elsanor Elementary	23440 US Hwy 90	Robertsdale	36567
Stapleton Elementary	35500 Baldwin Ave	Stapleton	36578
Pine Grove Elementary	43980 Pine Grove Rd	Bay Minette	36507
Loxley Elementary	4999 S Magnolia St	Loxley	36551

Swift Consolidated Elementary	6330 Bon Secour Hwy	Bon Secour	36511
The Academy of Arts & Sciences	6900 Hwy 59	Gulf Shores	36542
Eastern Shore Christian Academy	9078 Lawson Rd	Daphne	36526
J. Larry Newton Elementary	9761 CR 32	Fairhope	36532
Faith Christian Academy	18109 US HWY 98	Foley	36535
Grace Christian Academy	19470 Oak Rd W	Gulf Shores	36542
Victory Christian Academy	20511 CR 12 S	Foley	36535
St. Benedict Catholic School	12786 S Illinois St	Elberta	36530
St. Patrick Catholic School	23070 State Highway 59	Robertsdale	36567
Perdido Elementary	23589 CR 47	Perdido	36562
Summerdale School	400 E Broadway	Summerdale	36580
Good Shepherd Lutheran School	24933 Oak St	Elberta	36530
University of South Alabama - Baldwin Co	10 N Summit St	Fairhope	36532
University of South Alabama - Nursing Dept.	161 N Section St	Fairhope	36532
Faulkner State Community College	1900 US Hwy 31 S	Bay Minette	36507
Huntingdon College	1903 Main St	Daphne	36526
Auburn University	8301 State Highway 104	Fairhope	36532
Huggerlanding/Oyster Bay Volunteer Fire	198 S Ingleside Ave	Fairhope	36533
Huggerlanding/Oyster Bay Volunteer Fire	4590 CR 6	Gulf Shores	36542

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

Table 75: Baldwin County Medical Facilities Inventory

Facility	Address	City	Zip
Mercy Medical	101 Villa Dr	Daphne	36526
North Baldwin Infirmary	1815 Hand Ave	Bay Minette	36507
South Baldwin Regional Medical Center	1613 N Mackenzie St	Foley	36535
Thomas Hospital	750 Morphy Ave	Fairhope	36532

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

Table 76: Elderly Care Facilities

Facility	Name	Address	Zip
Age Well At Home, Inc.	620 E 21st Ave	Gulf Shores	36542
Azalea Place Assisted Living	2411 S Highway 31	Bay Minette	36507
Bay Minette Rotary Village	2211 McMillan Ave	Bay Minette	36507
Beverly Healthcare	108 S Church St	Fairhope	36532
Community Health Care Systems	25819 Canal Rd	Orange Beach	36561
Community Hospice	2770 S McKenzie St	Foley	36535
Community Hospice Of Baldwin	311 Dolive St	Bay Minette	36507
Covenant Hospice	6475 Van Buren St	Daphne	36526
Crossroad Assisted Living	42020 Snowden Ln	Bay Minette	36507
Foley Nursing Home	1701 N Alston St	Foley	36535
Garden of Daphne	1307 Daphne Ave	Daphne	36526
Hamlet Retirement Home	214 Windsor Dr N	Fairhope	36532
Homestead Village Of Fairhope	924 Plantation Blvd	Fairhope	36532
Hospice South	1113 N McKenzie St	Foley	36535
Magnolia House, Inc.	10171 Papageorge St	Daphne	36526
Magnolia Manors of Bay Minette	709 W 14th St	Bay Minette	36507
Mid Delta Hospice	300 S Greeno Rd	Fairhope	36532
Montrose Bay Health Care Center	22670 Main St	Montrose	36559
Nursing Advantage, Inc.	22913 CR 62 N	Robertsdale	36567
Oakwood	2010 Medical Center Dr	Bay Minette	36507
Robertsdale Healthcare Center	18000 US Hwy 90	Robertsdale	36567
Skilled Nursing At Westminster	500 Spanish Fort Blvd	Spanish Fort	36527
William F Green St Vet Home	300 Faulkner Dr	Bay Minette	36507
Wiregrass Hospice, Inc.	23210 US 98	Fairhope	36532

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

Table 77: 2015 Baldwin County Utilities Inventory

Facility	City	Zip
ADOT I-10 Welcome Center Lagoon	Loxley	36551
Baldwin County Electric Cooperation	Gulf Shores	36547
Bay Minette Martin Br Lagoon	Bay Minette	36507
Fairhope Sewage Treatment Plant	Fairhope	36532
Foley Waste Water Treatment Plant	Foley	36535
Gulf Shores Waste Water Treatment Plant	Gulf Shores	36542
Harry Still Sr Waste Water Treatment Plant	Bay Minette	36507
Lake Forest Waste Water Treatment Plant	Daphne	36526
Landing Incorporation Wastewater Treatment Plant	Stockton	36579
Lillian Sewer Co LLC WWTP	Lillian	36549
Loxley Town Of Lagoon	Loxley	36551
Orange Beach City Of	Orange Beach	36561
Pollution Contl. Sys Ft Morgan	Fort Morgan	36542
Riverdocs, Inc.	Daphne	36526
Riviera Utilities	Foley	36535
Robertsdale WWTP	Robertsdale	36567
South Ala Sewer Services WWTP	Fort Morgan	36542
Spanish Fort Water System, Inc.	Spanish Fort	36527
Steelwood Limited WWTP	Loxley	36551
Tensaw Island Land Shores WWTP	Bay Minette	36507

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

Table 78: 2015 Communications Facilities Inventory

Facility	Station Owner	City
WEIQ CH 42	Alabama Educational TV Co.	Mobile
WPMI CH 15	Clear Channel Broadcasting	Mobile
WALA-TV CH 10	Emmis Television License	Mobile
WEAR-TV CH 3	Wear Licensee, LLC	Pensacola
WMPV-TV CH 21	Trinity Broadcasting Network	Mobile
WHBR CH 33	Christian Television of Pensacola	Pensacola
WKRG-TV CH 5	Media General Broadcasting	Mobile
WJTC CH 44	Clear Channel Broadcasting	Mobile
WBPG CH 55	WBPG License Corp.	Gulf Shores
WLVV 1410	WLVV, Inc.	Mobile
WDLT 660	Cumulus Licensing Corp.	Fairhope

WBCA 1110	Southern Media Communications	Bay Minette
WABF 1220	Gulf Coast Broadcasting Co.	Fairhope
WDXZ 1000	Great American Radio Network	Robertsdale
WBLX-FM CH 225	Cumulus Licensing Corp.	Mobile
WYOK CH 281	Cumulus Licensing Corp.	Atmore
WMXC CH 260	Clear Channel Broadcasting	Mobile
WJLQ CH 264	Cumulus Licensing Corp.	Pensacola
WNSP CH 288	Com+, LLC	Bay Minette
WBHY-FM CH 203	Goforth Media, Inc.	Mobile
WXBM-FM CH 274	6 Johnson Rd Licenses	Milton
WPCS CH 208	Pensacola Christian College	Pensacola
WCSN-FM CH 289	Gulf Coast Broadcasting Co.	Orange Beach
WRKH CH 241	Clear Channel Broadcasting	Mobile
WKSJ-FM CH 235	Clear Channel Broadcasting	Mobile
WTKX-FM CH 268	Clear Channel Broadcasting	Pensacola
WHIL-FM CH 217	Spring Hill College	Mobile
WABB-FM CH 248	WABB-FM, Inc.	Mobile
WMEZ CH 231	6 Johnson Rd Licenses	Pensacola

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))

5.4 State and Local Mitigation Action Plan Samples

Table 79: 2018 State Mitigation Action Plan Sample Actions

Action #	Action	Priority	Hazard	Funding	Cost
4	Assist K-12 schools and state colleges and universities develop vulnerability assessments, mitigation plans and mitigation projects to improve safety in their most vulnerable buildings.	High	All	HMA & PA	
20	Advance provision for electrical generators through FEMA grant programs for critical facilities	High	All	HGMP	
74	Identify channels and ditches that must be improved to provide maximum drainage capacity.	Medium	Flood	FEMA	
79	Reduce the flooding risk to communities by acquiring property located in the 100- year floodplain and return it to open space	Medium	Flood	HGMP	
99	Construct five safe houses for district offices and purchase one 5KW generator for each safe house	Medium	Tornado	FEMA HMA	

Table 80: 2021 Baldwin County Highlighted Action Plan Items

Action #	Action	Priority	Hazard	Funding	Cost
2.2.1	Pursue grant funds to acquire and demolish flood prone or substantially damaged structures and replace with permanent open space	High	Flooding	HMA	
2.2.2	Utilize the most recent NFIP repetitive loss property list, and other appropriate sources, to create and maintain a prioritized list of acquisition mitigation projects based on claims paid	High	Flooding	TBD	
2.3.1	Pursue grant funds to subsidize the elevation of certain buildings in flood prone areas where acquisition or relocation is not feasible, with emphasis on Pre-FIRM buildings; where feasible, elevation is preferable to flood proofing	Medium	Flooding	HMA	
2.3.2	Pursue grant funds to repair, elevate and weatherize Local Funds homes for low- to moderate-income families	Medium	Flooding	HMA	
2.6.1	Pursue FEMA grant funds to retrofit existing buildings, critical facilities, and infrastructure against potential damages from natural and manmade hazards.	Medium	All Hazards	HMA	
2.9.1	Pursue grant funding for the installation of back-up power generators for critical facilities.	Medium	All Hazards	HMA	
3.10.5	Upgrade critical communications infrastructure	High	All Hazards	TBD	
4.1.1	Increase open space acquisitions through the FEMA HMA Grant Programs and other floodplain acquisition efforts.	Medium	Flooding	HMA	
5.2.1	Construct drainage improvements to reduce or eliminate localized flooding in identified problem drainage areas	Medium	Flooding	HMA	
5.3.2	Pursue grand funds to establish a program for subsidizing safe room and storm shelter construction in appropriate locations and facilities	Medium	All Hazards	HMA	
5.4.1	River Rd Re-Alignment (and similar projects) that identify roadway providing access to residents and public safety which can be improved to mitigate loss of access due to flooding.	Medium	Flooding	HMA	

Source: 2015 Baldwin County Multi-Hazard Mitigation Plan ([baldwin-complete.pdf \(alabama.gov\)](#))