

CITY of WARWICK CDBG DISASTER RECOVERY ACTION PLAN



Jambray Court (Warwick, Rhode Island)

**Utilizing Supplemental CDBG Disaster Recovery Funding
from the Supplemental Appropriations Act
(Public Law 111-212, approved July 29, 2010)**

Through U.S. Department of Housing and Urban Development
Docket No. FR-5452-N-01
[Federal Register: Volume 75, Number 217]

City of Warwick Office of Housing and Community Development
December 2010

Table of Contents

Section A	Effect of Disaster on Warwick.....	2
Section B	Disaster Recovery Plan.....	3
Section C	Monitoring.....	6
Section D	Management Standards.....	8
Section E	Disaster Recovery Activities.....	10
Section F	Amendments and Public Participation.....	15
Appendices.....		16

Section A Effect of Disaster on Warwick

The Effects of the March 2010 Flood (FEMA declaration DR-1894)

The flooding that occurred during March of 2010 (FEMA declaration DR-1894) was perhaps the worst flooding event that both the City of Warwick & the State of Rhode Island have seen in 100-years and has been compared to the blizzard of 1978 as one of the worst recent natural disasters.



City of Warwick Waste Water Treatment Facility

The effects of both the March 12th & 30th flooding events on the City of Warwick, Rhode Island are still being quantified. While it has been nearly 10-months since the last event – individual property owners, businesses owners and local government officials are still quantifying the impact on private property and public infrastructure.

While the flooding events of March 2010 caused damage and destruction

throughout the City of Warwick – the areas of greatest impact were those areas of the City that border the Pawtuxet River, which crested at 20.79' (11' above flood level). The hardest hit areas include; East Natick, Natick, Pontiac, Norwood/Lakewood, Pawtuxet, and the Jefferson Boulevard Commercial Corridor. The East Natick & Pontiac sections of the City represent designated CDBG eligible areas with 55.6% & 61.1% of the population falling into the low moderate income category respectively.

Those businesses, residential structures, and public infrastructure located in close proximity to the Pawtuxet River suffered the greatest losses – due to the amount and timing of the storms. These areas were impacted by both ground and riverine based flood waters containing raw/untreated sewerage and chemicals from industrial facilities. Needs for those impacted are difficult to measure – while some received a partial benefit from FEMA or the SBA or through private insurance, it is not sufficient to make those affected whole. Most other's received such limited amounts of assistance that the effects of the storm are still visible in their homes and businesses – with no insurance and no ability to borrow additional funds, even from the SBA, due to poor credit or cash flow, these individuals are whom the City of Warwick is going to reach with this funding.

Section B Disaster Recovery Plan

Promotion of Sound Short & Long-Term Recovery Planning



East Natick Village (Warwick, Rhode Island)

The Office of Housing & Community Development, within the City of Warwick, is the Office responsible for the implementation and monitoring of the CDBG-DR funds. The Office, a division of the Department of Planning, currently administers the City's annual CDBG Entitlement Grant Program and has the ability to access zoning and land use plans and ordinances in conjunction with the planned recovery of those areas affected by the flooding events. In addition, the Office works closely with the City's Building & Inspections Office to ensure proper permits

and procedures are followed for properties requiring rehabilitation.

The Office will focus its short-term recovery efforts on providing direct financial & technical assistance to address the unmet needs of individuals & businesses affected by the flood with regards to repairs & rehabilitation of housing units, removal of debris from privately owned property, and assistance to cover lost revenue and equipment repairs & replacement (businesses only). In addition, CDBG-DR funds will also be utilized to cover the cost of repair/replacement of public facilities and infrastructure damaged as a result of the floods.

Long-Term recovery planning efforts utilizing the CDBG-DR funds will focus on mitigation and prevention of damage due to future flooding events. Funds will be used to support a comprehensive mitigation assessment of critical public facilities (water/waste water treatment) that were damaged or destroyed during the flood. CDBG-DR funds will also be utilized to provide financial incentives to property owners that would allow for voluntary buy-outs of repetitive flood properties.

By its working relationships with other Municipal and State agencies, the Office will provide assistance to those responsible for land use planning and flood zone development in an effort to ensure that sound decisions are formulated on the future development in the affected areas.

Leveraging of CDBG-DR Resources

The Office plans to leverage the CDGB-DR funds with other federal and non-federal sources of funds. The Office manages a revolving loan fund for the rehabilitation of property owned by low-moderate income individuals, this fund will be utilized to provide additional resources to the residential rehabilitation aspects of the recovery efforts.

In addition, the Office will also be applying for HMGP funds through FEMA for hazard mitigation projects and voluntary residential buy-outs.

Leveraged funds will also be sought when available from the Small Business Administration and the Economic Development Administration to provide further assistance and support to business mitigation and recovery efforts.

Promotion of High Quality, Durable, Energy Efficient and Mold-Resistant Construction Methods

The Office shall require that all projects that relate to the construction or rehabilitation of multi-family and/or single-family housing units will be required to have the appropriate permits and inspection in accordance with the State of Rhode Island Building Code and/or City of Warwick Code of Ordinances.

Currently all permits issued, by the City's Building Department, on properties affected during the flood event must provide a certification that the areas of the property that came in direct contact with flood waters were sanitized in accordance to industry standards regarding mold, mildew and indoor air quality.

The Office, through its revolving loan fund, encourages the utilization of cost effective durable & energy efficient materials – including insulation, replacement windows, insulated doors and siding materials.

Provision of Adequate, Flood-Resistant Housing for all Income Groups Affected in the Disaster Areas

The Office intends to utilize the CDBG-DR funds to provide numerous programs in the form of financial assistance to all income groups affected by the disaster. The disaster event did not discriminate against those individuals affected – both low-to-moderate income and high income households were affected to varying degrees. The greatest concentration of residential structures affected by the flooding of the Pawtuxet River was predominantly in low-to-moderate income areas. Residential units affected with rising levels of ground water due to substantial rainfall in a short time frame are located throughout the City and with out regard for income level.

While the majority of the funds under CDBG-DR funding will benefit low-to-moderate income persons ($\leq 80\%$ AMI), the Office also intends to provide financial resources to those that are not considered low-to-moderate income ($>80\%$ AMI) but suffered a loss due to the flooding events. The Office plans to provide grants to owners of multi-family and single-family housing units to rehabilitate those units to pre-disaster condition. The Office also plans to provide funds to leverage voluntary buy-outs for those owner's not interested in rehabilitating their properties that are in repetitive flood areas of the City.

Strict compliance with zoning, land use planning, State of RI Building Codes, City of Warwick Ordinances, and FEMA regulation regarding re-development of property

located in specific flood zones and repetitive flood areas will be implemented to ensure the future losses are mitigated and the health and safety of the residents is preserved.

The Office works closely with many local non-profit providers of emergency assistance including shelter, food, and child care services. The Office will continue to work closely with these service providers to ensure victims of the disaster, especially very low income families, those with children and those with special needs, receive the services and support that their families require until such time as the unmet need for those services no longer exists.

DRAFT

Section C Monitoring

Monitoring of the CDBG Program is a continuous process. The City of Warwick works to determine if programs and services are meeting their stated objectives and are in compliance with HUD requirements. The monitoring process includes on-site visitation and regular review of monthly performance reports and payment requests.

The Office staff monitors all program activities, including those managed by the Office, other City Departments and Sub recipients. Specific sub recipients may include other government agencies, non-profit agencies or private entities and organizations.

Objectives

Monitoring will be used to identify specific compliance deficiencies, request corrections and reinforce or improve grantee performance by providing guidance and making recommendations.

Specific objectives of monitoring include the following:

1. Verification of the accuracy of sub recipient's records
2. Confirmation of the accuracy of information presented in the quarterly reports
3. Verification that grantees' use of funds is consistent with their stated objectives
4. Identification of potential problems or the apparent causes of actual problems
5. Corrective action in the case of a problem

Guidelines

The frequency and intensity of monitoring will be determined for each sub recipient by an annual assessment of several risk factors associated with the administration of the assisted activity or service. The following criteria are used to determine the level of risk, which will then determine the appropriate monitoring activities:

1. The type of activity being assisted
2. The length of time activity has been managed
3. Whether the funded activity provides a direct benefit that is consistent with at least one national objective
4. The amount of funding being provided
5. The number of years that the program or service has been federally funded
6. The agency's prior history and level of success in administering type of program being funded and other types of programming, including any record of non-compliance
7. Recent staff turnover
8. The Program's track record with regard to problems and problem resolution

The minimum level of monitoring will consist of in-house reviews on a quarterly basis of the sub recipient's performance reports and the supporting documentation submitted with request vouchers for reimbursements. The performance report will be examined to determine if the actual accomplishments meet the stated goals and objectives contained in the sub recipient agreement. This examination will also determine if time schedules are met and whether projected work units, caseload or other performance indicators are achieved. Sub recipient request for payment will be approved only if: the request includes program reports and back-up documentation, the request complies with the sub recipient agreement, reimbursements are for eligible costs and are reasonable, and if the program is still operational.

The Office has undertaken a monitoring procedure that includes five specific steps including a procedure to set up the monitoring visit and report the results to the sub recipient or monitored agency. The Office has also instituted a system for early warning/early response of problems and issues; intervention for more serious or persistent problems and a "red alert" for serious and persistent problems with a sub recipient.

Additional monitoring activities will be undertaken as needed including increased telephone contacts, more frequent on-site visits and request for additional program and financial information.

Evaluation of programming will generate information needed to:

1. Determine community progress towards achieving the goals of the Action Plan
2. Drive the grantee selection process and allocate resources more effectively
3. Identify areas in need of improvement
4. Engage in benchmarking to identify best practices in the delivery of services
5. Provide a basis for comparing the achievement of assisted programs with those on other communities and
6. Continually improve and refine the performance measurement system

The performance measurement system will determine the effect of assisted programs and services in achieving HUD national objectives and other specific goals.

Increasing Implementation Capacity

The Office will provide technical and management assistance to subrecipients. Assistance will be provided in the form of Workshops and Training Sessions, email and telephone guidance, and on-site visits and instruction when necessary.

The Office will focus on providing these services, as well as performing the Administrative, Procurement, Monitoring and Reporting Functions associated with the grant. The Project Coordinator will coordinate with existing Programmatic and Fiscal Management Staff to provide necessary assistance.

Section D Management Standards

Accounting and Procurement

The Office of Housing Community Development staff actively monitors Sub recipients to prevent or correct instances of Fraud, Waste and Mismanagement. Through on-site and desk-top monitoring, as described in the *Monitoring Standards and Procedures* section above, the Office of Housing Community Development will ensure that program milestones are being accomplished, that performance goals are being met, and that applicable Federal, State, and Local laws and regulations are being followed.

All activities undertaken within the scope of this grant must be conducted in compliance with applicable CDBG Laws and regulations, as well as all other Federal, State and Local requirements, including OMB Circulars A-87, A-122 (where applicable), A-133 and the Uniform Administrative Requirements at 24 CFR Part 85.

Accountability

The use of the disaster funding is contingent upon certain requirements. The chief elected official, or designee authorized by the governing authority of the local government applying for funds, will be required to certify in writing that the grant will be carried out in accordance with applicable laws and regulations.

Sanctions and Penalties for Fraud, Abuse and Mismanagement

While the Office of Housing Community Development emphasis will be on preventing and correcting issues before they develop into major problems, the Office reserves the right to issues sanctions for non-compliance, fraud, abuse and mismanagement in a range of penalties including disallowance of all ineligible costs. Additional penalties and sanctions will include referrals of criminal matters to appropriate federal or state authorities.

Programmatic Measures to Avoid Abuse, Fraud and Mismanagement

A. Documentation

Subrecipients will be required to submit or maintain documentation that fully supports the application that is submitted to the Office. Failure to document that the project is needed as a result of the disaster(s), or to mitigate the effects of future disasters, will result in an application being declared ineligible. If it is discovered, after an award is made, that an application purposefully misled the Grantee, the contract with the subrecipient will be terminated and the subrecipient will have to repay any funds received to that point.

B. Program Changes through Contract Amendments

All subrecipients will be encouraged to carefully plan projects that meet the stated requirements and to specify activities, associated costs, and proposed accomplishments and beneficiaries in order to reduce the need for amending contracts. Subrecipients must contact the Office prior to requesting an amendment or contract modification that affects the budget, activities, beneficiaries, or time frame for accomplishing the proposed

activities. Substantial amendments may be cause to review the entire application submitted to determine if the project is meeting its stated goals and its timelines.

C. Reporting

Each awarded subrecipients must supply all reports requested by the Office of Housing Community Development on the status of the activities undertaken and Grant funds drawn. All reporting requirements (i.e., annual audits, contractual obligations and minority business enterprise reports, Quarterly DRGR reports, etc.) will be specified in the Grant Agreement and Subrecipients Contract.

D. Citizen Complaints

All subrecipients need to establish procedures for responding to citizens' complaints regarding activities carried out utilizing these funds. Citizens should be provided with an appropriate address, phone number, and times during which they may submit such complaints. Subrecipients should provide a written response to every citizen complaint within 30 calendar days of the complaint.

DRAFT

Section E Disaster Recovery Activities

Project Uses of Funds



Local Business (Norwood Village Area)

The City of Warwick is scheduled to receive \$2,787,697.00 in CDGB-DR funds. The City will set aside 5% (\$139,385.00) of the allocation for Administrative & Program Management Costs associated with the CDGB-DR Funds. The remaining \$2,648,313.00 will be available for projects, programs, & services associated with the City's CDGB-DR Action Plan.

The Office intends to use 50-60% (\$1,324,156.00 - \$1,588,987.00) of the allocation for projects that provide benefits to individuals that are low-to-moderate income. The remaining 40-50% (\$1,059,325.00 - \$1,324,156.00) will be awarded to projects that meet at least one of the three CDBG National Objectives.

The Office consulted with many stakeholders to determine where the CDBG-DR funds could make the most impact on those affected by the disaster. Those stakeholders included; the Warwick Sewer Authority, City of Warwick Department of Public Works, City of Warwick Department of Building & Inspection, City of Warwick Department of Tourism, Culture, & Development, the Central Rhode Island Chamber of Commerce, Westbay Community Action, Inc., State of Rhode Island Office of Housing & Community Development, and the US Small Business Administration (Rhode Island District Office). It was determined that the funds should be allocated to projects associated with the categories listed below.

- **Public Facilities & Infrastructure** (30 - 50% of Total Allocation)

CDGB-DR funds are available to be used to repair or replace public facilities & infrastructure components that were damaged as a result of the disaster. In addition to the repair & replacement, funds will also be available to relocate critical public facilities and infrastructure components that have now been determined to be at risk of future disasters or the benefit cost analysis to replace in situ is not cost effective. Some funds will be allocated to reimburse for emergency expenditures made to repair critical public facilities & infrastructure components that were integral to the City's recovery from the disaster.

Some of the types of public facilities & infrastructure projects that would be undertaken would be the repair or replacement of; waste water treatment systems, storm drains, public recreational facilities (income eligible areas only), and public buildings.

Threshold Factors: Projects will be evaluated and funded based on the following criterion:

- Importance of the project based up community need and impact of project on overall community health, safety , and welfare
- Effectiveness of the improvement to minimize future impacts
- Cost effectiveness of the project
- Timeliness of the improvements

- **Housing Activities** (0 – 20% of Total Allocation)

CDBG-DR funds are available to be used to assist low-and-moderate income households with renovation & repairs to existing housing units, debris removal, and demolition of structures, and other unmet housing needs as a result of the disaster.

Threshold Factors: Projects will be evaluated and funded based on the following criterion:

- Income eligibility of household (<120% AMI)
- Evidence of application to FEMA and/or SBA, proof of grant and/or loan amount, evidence of disposition of FEMA/SBA funds
- Documented loss and conformance with current Building Codes
- Type and severity of unmet need
- Projected mitigation measures that effectively reduce potential future comparative losses

- **Residential Property Acquisition** (0 – 20% of Total Allocation)

CDGB-DR funds shall be available to assist property owners with the leveraging of other funds to facilitate voluntary buyouts of housing units in repetitive flood areas.

Threshold Factors: Projects will be evaluated and funded based on the following criterion:

- Appraised value – pre & post disaster
- Documented loss
- Consultation & Agreement with Planning & Building Departments
- Partnership with other funding sources for leverage
- Deed restriction on property for future development
- Projected future use of acquired property

- **Business Recovery & Mitigation** (0 – 15% of Total Allocation)

CDGB-DR funds shall be available to local businesses that suffered physical damage, to property or equipment, due to the disaster and/or loss of revenue due to the closure of a public facility or public infrastructure. CDBG-DR funds are also available to owners of commercial property to perform mitigation measures on the facility to prevent or reduce damage from future flooding events.

Threshold Factors: Projects will be evaluated and funded based on the following criterion:

- Documented loss – physical (structure and/or equipment) and or economic
- Overall mitigation measures that provide resilience to future disasters
- Current location and operation of business
- Application and receipt of financial assistance or denial from SBA, financial institution, or other private or public financial organization
- Business owners use of personal financial resources
- Evidence of low and moderate individuals were employed prior to disaster and commitment to rehire/hire additional low and moderate employees
- Evidence that business owner is low to moderate income
- Commitment to re-open business with in a specified time period (depending on type and amount of funding)

- **Hazard Mitigation & Planning** (0 – 15% of Total Allocation)

CDBG-DR funds shall be available for Hazard Mitigation & Planning activities that identify and work to reduce damage and losses from future storms and flooding events. Activities may include; public facility & infrastructure studies, land-use planning – focusing on zoning amendments and flood-plain management strategies.

Threshold Factors: Projects will be evaluated and funded based on the following criterion:

- Cost effectiveness of the mitigation measures and/or reasonable alternatives
- Reasonableness of planning activity and activities outcome
- Effectiveness of the project addressing future disasters, hazard mitigation and planning
- Documented projects that provide long-term solutions to the effects of the disaster and those of future disasters

- **General Administration** (5% of Total Allocation)

CDGB-DR funds shall be available to cover administrative costs directly related to the implementation of the Action Plan and its components; including but not limited to personnel salary & fringe benefits, consultants, monitoring of activities and sub-grantees, quarterly reporting to HUD and compliance to all regulations with respect to CDBG-DR funds and any other applicable Federal, State, or Municipal laws and regulations.

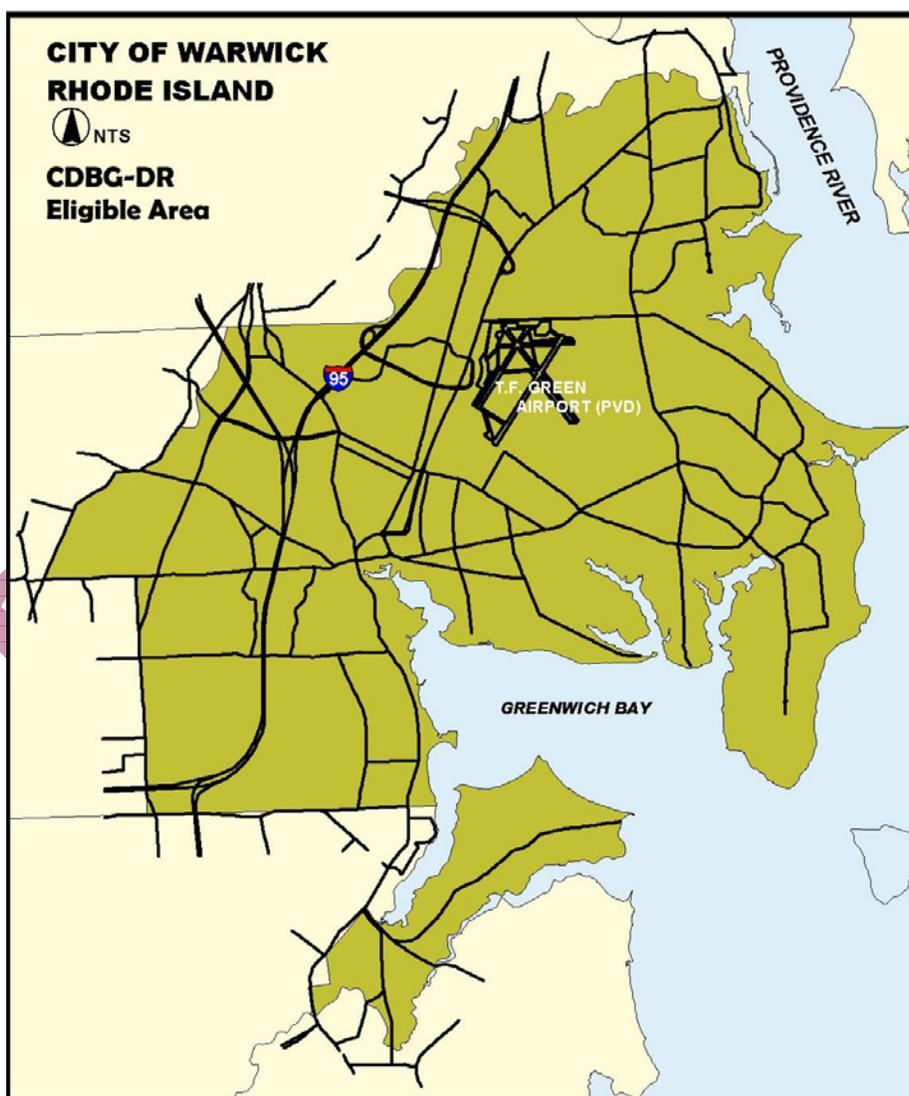
CDBG-DR Eligible Activities (Cost by Category)

Category	Minimum Percent of Allocation	Minimum Funding Amount	Maximum Percent of Allocation	Maximum Funding Amount
Public Facilities & Infrastructure	30%	\$836,309.00	50%	\$1,393,848.00
Housing Activities	0%	\$0.00	20%	\$557,539.00
Residential Property Acquisition	0%	\$0.00	20%	\$557,539.00
Business Recovery & Mitigation	0%	\$0.00	15%	\$418,155.00
Hazard Mitigation & Planning	0%	\$0.00	15%	\$418,155.00
General Administration	0%	\$0.00	5%	\$139,385.00

Project Use by Geographic Area

In accordance with the FEMA Declaration (FEMA-1894-DR) the following counties of the State of Rhode Island were determined to be eligible for both individual & public assistance; Bristol, Kent, Newport, Providence and Washington.

As a result of the size and geographic location of the City of Warwick in the County of Kent, the CDGB-DR funds will be available throughout the entire jurisdictional boundaries of the City of Warwick. Although the Office will focus on addressing the ongoing unmet needs of individuals and families in areas of the City that border the Pawtuxet River, these individuals and families will not be a higher priority than those which do not live in the boarder area. No individual or family will be denied assistance based on solely on geographic location in the City.



SECTION F Amendments and Public Participation

ACTION PLAN AMENDMENTS

The following events would require a substantial amendment to the Action Plan:

- 1) A change in Eligible Activities allowed under the plan (addition, deletion, or planned beneficiaries);
- 2) A change of more than 25% in the overall proposed funding allocation between the activity categories of infrastructure, property buyouts, housing, planning, public services and administration;

Substantial amendments to the Disaster Recovery Action Plan, if any, will be published on the City of Warwick Office of Housing and Community Development website, emailed to affected local groups and will provide for a public comment period. All comments will be considered.

PUBLIC PARTICIPATION PROCEDURE

The City of Warwick Office of Housing Community Development will post a draft action plan for the use of the funds, and any substantial amendment to the plan as described above, on the website for a period of not less than (7) calendar days; public comments will be accepted during this time.

Adequate notification will be given to Local and Regional Planning Commissions and units of Local Government, and a Notice of Posting for public comments will be published in the Warwick Beacon:

All comments will be reviewed and incorporated into the draft plan for submission to HUD.

E-mail your comments to Kevin.J.Sullivan@warwickri.com or mail your comments to:

Kevin Sullivan, Program Coordinator
City of Warwick Office of Housing and Community Development
City Hall Annex
3275 Post Road
Warwick, RI 02886

APPENDIX A

CERTIFICATIONS

Certifications for city governments, waiver and alternative requirement. Section 91.325 of title 24 Code of Federal Regulations is waived. Each grantee must make the following certifications prior to receiving a CDBG disaster recovery grant:

A. The city certifies that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the city, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard. (See 24 CFR 570.487 (b) (2) (ii).)

B. The city certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity associated with funding under the CDBG Program.

C. The city certifies its compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms, if required by that part.

D. The city certifies that the Action Plan for Disaster Recovery is authorized under local law and that the city, and any entity or entities designated by the city, possesses the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice.

E. The city certifies that it will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for this grant.

F. The city certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

G. The city certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 (except as provided for in notices providing waivers and alternative requirements for this grant), and that each unit of general local government is receiving assistance from the city is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).

H. The city certifies that it has consulted with affected units of local government in counties designated in covered major disaster declarations in the non-entitlement,

entitlement and tribal areas of the city in determining the method of distribution of funding.

I. The city certifies that it is complying with each of the following criteria:

- (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure, housing, and economic revitalization in areas affected by severe storms and flooding that occurred between March and May 2010, for which the President declared a major disaster, covering an entire State, or States with more than 20 counties declared major disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
- (2) With respect to activities expected to be assisted with CDBG disaster recovery funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low and moderate-income families.
- (3) The aggregate use of CDBG disaster recovery funds shall principally benefit low and moderate-income families in a manner that ensures that at least 50 percent of the amount is expended for activities that benefit such persons during the designated period.
- (4) The city will not attempt to recover any capital costs of public improvements assisted with CDBG disaster recovery grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (A) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (B) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (A).

J. The city certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

K. The city certifies that it has and that it will require units of general local government that receive grant funds to certify that they have adopted and are enforcing:

- (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

(2) A policy of enforcing applicable local laws against physically barring entrance to or exit from a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

L. The city certifies that each city grant recipient or administering entity has the capacity to carry out disaster recovery activities in a timely manner, or the city has a plan to increase the capacity of any city recipient or administering entity that lacks such capacity.

M. The city certifies that it will not use CDBG disaster recovery funds for any activity in an area delineated as a special flood hazard area in FEMA’s most current flood advisory maps unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain in accordance with Executive Order 11988 and 24 CFR part 55.

N. The city certifies that it will comply with applicable laws.

Signed By: Scott Avedisian, Mayor
City of Warwick, Rhode Island

Date: _____

APPENDIX B
**LEGAL NOTICE OF FILING
OF
DISASTER RECOVERY ACTION PLAN**

The City of Warwick Office of Housing and Community Development wishes to encourage citizens to participate in the development of the CDBG Disaster Recovery Action Plan. The City of Warwick is providing the opportunity for citizens to comment on the draft Plan, which will be submitted to the US Department of Housing and Urban Development (HUD) on or before January 11, 2011. The Action Plan will set forth the method of distribution of funds for the HUD-funded program.

Members of the public are invited to review the Plan prior to January 11, 2011, prior to its submission, during the hours of 8:30 am to 4:30 pm, January 4, 2010 through January 11, 2011, at the City of Warwick, Office of Housing and Community Development, 3275 Post Road, Warwick, RI 02886. The Plan will also be available on the Community Development website at www.warwickri.gov

Electronic comments can be e-mailed to kevin.j.sullivan@warwickri.com . Written comments are invited to be sent to the following address:

Kevin Sullivan
Office of Housing & Community Development
3275 Post Road
Warwick, RI 02886

For more information, contact Kevin J. Sullivan at 738-2000 ext. 6371.
Scott Avedisian, Mayor



APPENDIX C
**LEGAL NOTICE OF FILING
OF
DISASTER RECOVERY ACTION PLAN**

Traducción en Español

**Aviso Legal de Presentación
del
Plan de Acción de Recuperación de Desastres**

La Oficina de Vivienda y Desarrollo Comunitario de la Ciudad de Warwick quiere invitar a los ciudadanos a participar en el desarrollo del Plan de Acción de Recuperación de Desastres de CDBG. La Ciudad de Warwick está brindando la oportunidad a los ciudadanos de hacer comentarios sobre el bosquejo del plan. El Plan de Acción final se presentara al Departamento de Vivienda y Desarrollo Urbano de Estados Unidos (HUD por sus siglas en inglés) en o antes del 11 de enero del 2011. El Plan de Acción establecerá el método de distribución de los fondos para el programa financiados por HUD.

Los miembros del público están invitados a revisar el Plan antes de su presentación el 11 de enero del 2011, entre las fechas del 4 de enero al 11 de enero del 2011 entre las horas de 8:30 a.m. a 4:30 p.m., en la Oficina de Vivienda y Desarrollo Comunitario localizada en el 3275 Post Road, Warwick, RI 02886. El Plan también estara disponible en internet en la página de la Oficina de Vivienda y Desarrollo Comunitario www.warwickri.gov

Comentarios electronicos pueden ser enviados a Kevin.J.Sullivan@warwickri.com
Los comentarios por escrito pueden ser enviados a la siguiente dirección:

Kevin J. Sullivan
Oficina de Vivienda Y Desarrollo Comunitario
3275 Post Road
Warwick, RI 02886

Para más información contactar a Kevin J. Sullivan al 738-2000 ext. 6371

Scott Avedisian
Alcalde

