



COOK COUNTY
BUREAU OF
ECONOMIC
DEVELOPMENT

DRAFT ACTION PLAN

FOR COOK COUNTY, ILLINOIS
2023-2024 DISASTER EVENTS



AUGUST 2025



COOK COUNTY ACTION PLAN
FOR COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER
RECOVERY (CDBG-DR) FUNDS
DISASTER RELIEF SUPPLEMENTAL APPROPRIATIONS ACT, 2025
(PUB. L. 118–158)

2023 Severe Storms and Flooding FEMA–4728–DR
Declared 8/15/2023

2023 Severe Storms and Flooding FEMA–4749–DR
Declared 11/20/23

2024 Severe Storms, Tornadoes, Straight-line Winds, and Flooding FEMA–4819–
DR
Declared 9/20/2024

Assistance Listing Notice # 14.218 Federal Register Notice: [90 FR 4759](#)

Record of Amendments

DATE ACTION PLAN WAS APPROVED BY HUD	
October X, 2025	

DATE AMENDMENT APPROVED BY HUD	AMENDMENT NUMBER	DESCRIPTION OF AMENDMENT

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1

Executive Summary

1 Executive Summary

1.1 Overview

The U.S. Department of Housing and Urban Development (HUD) announced that Cook County, Illinois, will receive \$244,162,000 in funding to support long-term recovery efforts for storms declared by FEMA, and they are as follows:

- Severe Storms and Flooding (DR-4728) for incident period June 29, 2023–July 2, 2023
- Severe Storms and Flooding (DR-4749) for incident period September 17, 2023–September 18, 2023
- Severe Storms, Tornadoes, Straight-line Winds, and Flooding (DR-4819) for incident period July 13, 2024–July 16, 2024

This funding is provided through HUD’s Community Development Block Grant-Disaster Recovery (CDBG-DR) program, which is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address the remaining unmet needs in Cook County, IL.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. HUD has allocated \$244,162,000 in CDBG-DR funds to Cook County, IL, in response to DR-4728, Severe Storms and Flooding; DR-4749, Severe Storms and Flooding; and DR-4819 Severe Storms, Tornadoes, Straight-line Winds, and Flooding through the publication of the Federal Register Allocation Announcement Notice FR-6512-N-01.¹ This allocation was made available through Public Law 118-158.

This document outlines a plan for allocating funds to address the remaining unmet disaster recovery and mitigation needs related to the qualifying disaster. By utilizing data from FEMA, SBA, HUD, and other federal, state, and local sources, we have identified categories of recovery needs, which are further supported by public comments, county mitigation plans, and stakeholder outreach. Throughout the grant period, the County will continuously assess the needs of affected households and communities, and, if persistent disaster-related needs are identified, the County is ready to allocate resources to address them.

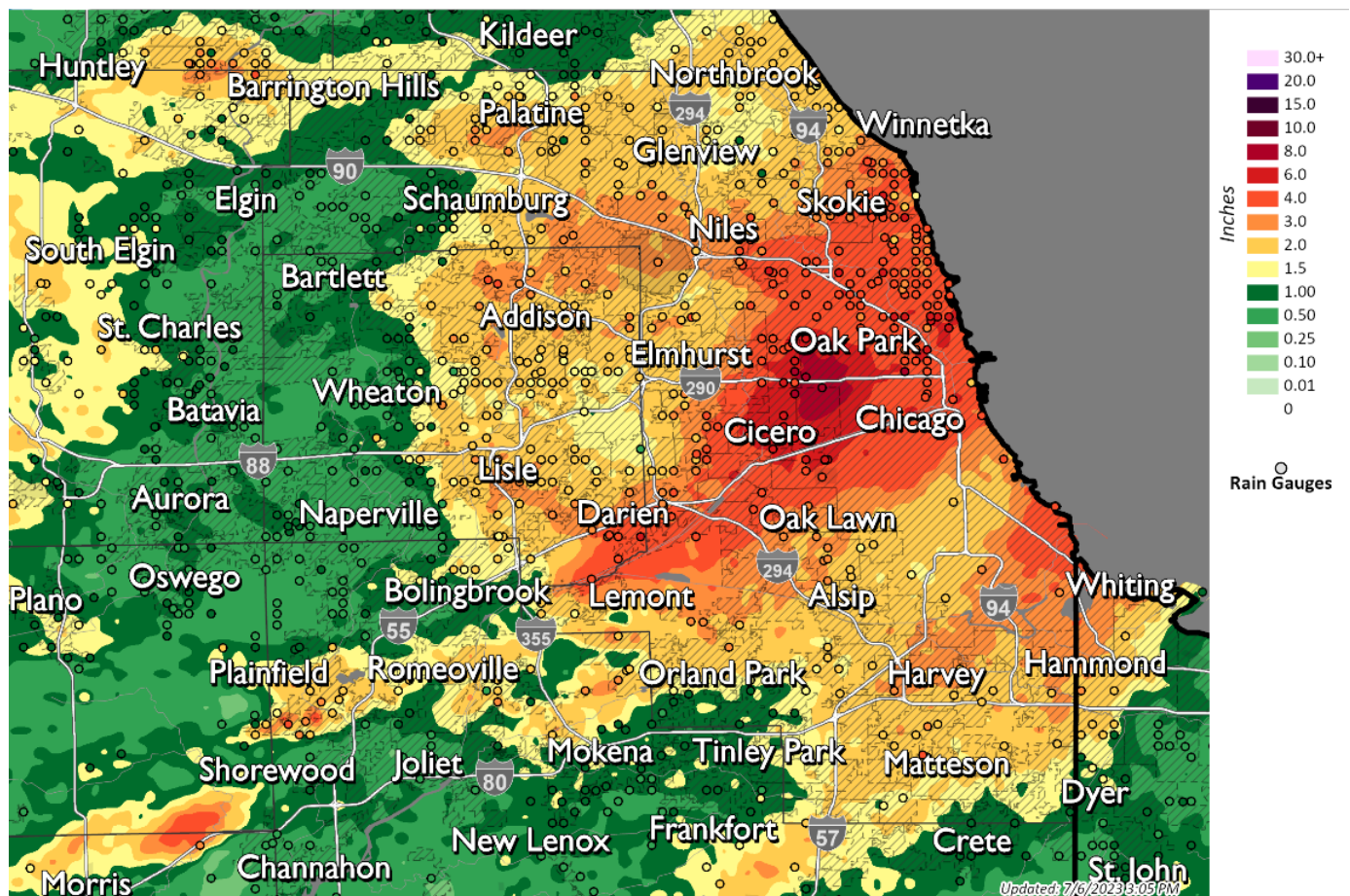
¹“Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG–DR Consolidated Waivers and Alternative Requirements Notice (UN AAN).” U.S. Department of Housing and Urban Development. 90 Federal Register 4759. 16 January 2025. <https://www.govinfo.gov/content/pkg/FR-2025-01-16/pdf/2025-00943.pdf>

1.2 Disaster-Specific Overview

Beginning on June 29, 2023, Cook County experienced a derecho, which is a widespread, long-lived windstorm associated with a fast-moving group of severe thunderstorms. This type of storm can produce powerful straight-line winds capable of causing significant damage over large areas. True to its nature, this storm front brought damaging straight-line winds, resulting in five confirmed tornadoes and wind gusts exceeding 100 miles per hour in the Cook County, IL, area.

A third set of severe storms occurring on July 2, 2023, brought significant rainfall, with localized totals reaching up to 8 inches in less than 24 hours. This caused flash flooding in and around the communities within Cook County. The storms also downed numerous trees, leading to widespread power outages and disruptions to transportation due to flooding and debris on the roads. The continuation of severe storms during this period caused further damage to public and private property in the affected areas and hindered the ability of these areas to undertake effective response and recovery operations. The high temperatures and humidity throughout this period, both during and after the storms, necessitated the opening of shelters and public places to protect the public from heat-related injuries.

Figure 1: July 2, 2023, Midnight to 7 PM, with Rain Gauges Overlaid

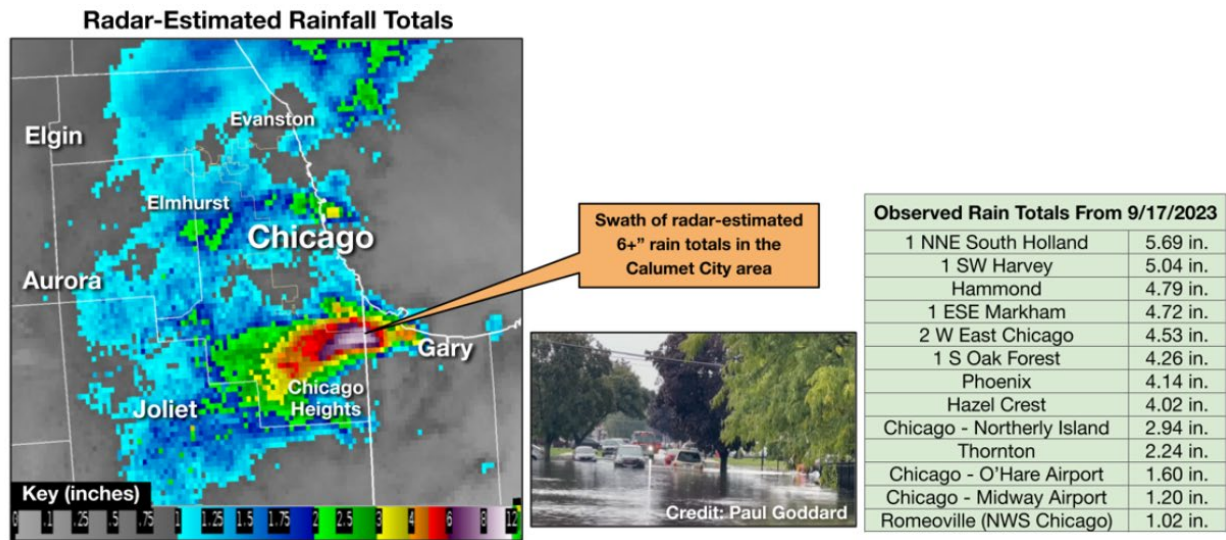


Reference: National Weather Service - Flash Flooding in Chicago and Nearby Suburbs

A little over two months later, on Sunday, September 17, 2023, parts of Cook County experienced more than 6 inches of rainfall in less than 12 hours, leading to severe flooding, straight-line winds, and other storm damage.

Figure 2: September 17, 2023, Recap of Flooding Event

Reference: [National Weather Service: Flash Flooding Near South Suburbs of Chicago](#)



From July 13, 2024, through July 16 2024, Cook County experienced severe storms, tornadoes, straight-line winds, and flooding. The storms caused extensive damage to homes, businesses, and infrastructure, with many buildings suffering from roof damage, broken windows, and structural issues due to high winds and tornadoes. Heavy rainfall led to severe flooding in various parts of the county, inundating streets, basements, and low-lying areas, causing disruptions and property damage. The combination of strong winds and flooding resulted in widespread power outages, leaving thousands of residents without electricity for several days.

Figure 3: July 13-16, 2024, 2-Day Period Ending at 7:00 AM CDT on July 15, 2024

Reference: [National Weather Service - Chicago, Cook County Event Summaries](#)

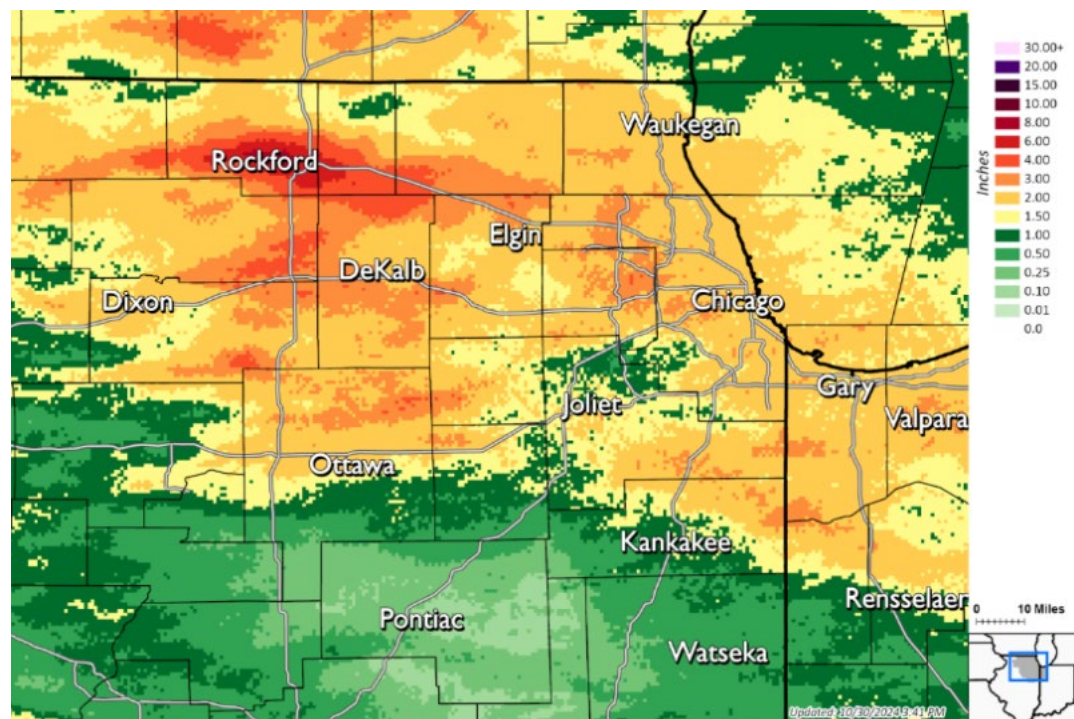
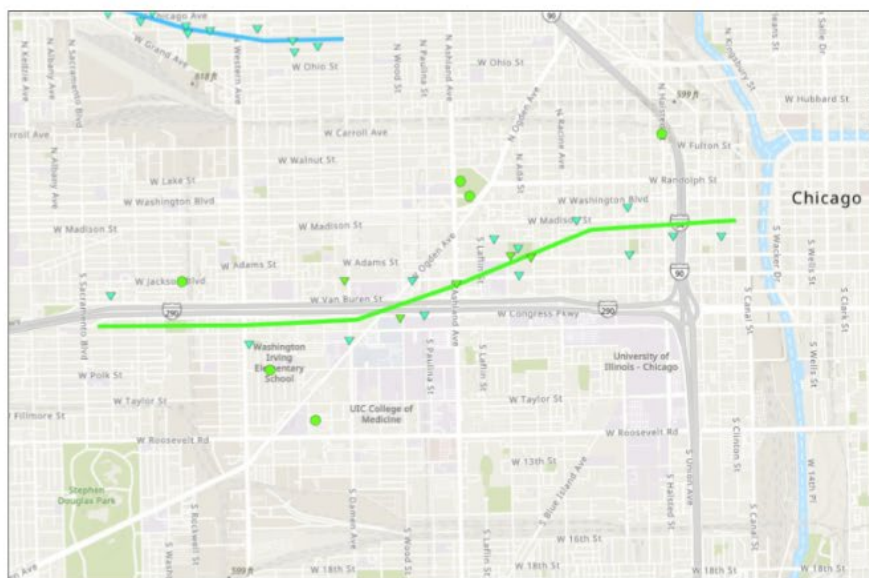


Figure 4: July 15, 2024, Near West Side Tornado

 Storm Survey Results Near West Side Tornado (City of Chicago – Cook County)	
Date	07/15/2024
Time	9:47 - 9:53 PM CDT
EF Rating	EF-1
Est. Peak Winds	95 MPH
Path Length	3.1 miles
Max Width	400 yards
Injuries/Deaths	0/0



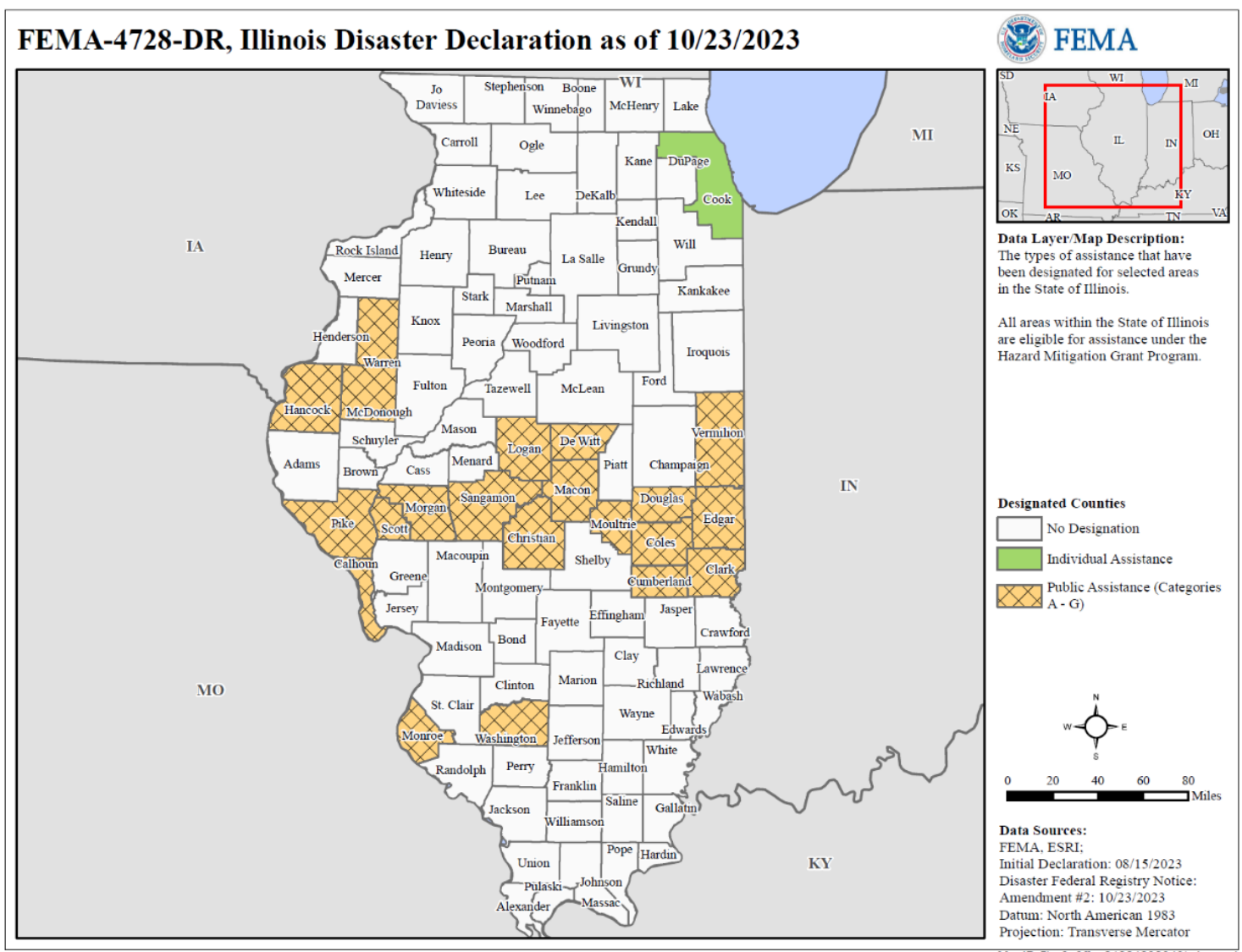
 EF0
  EF1
  EF2
  EF3
  EF4
  EF5
  TSTM
  UKN

Reference: [National Weather Service - Chicago, Cook County Event Summaries](#)

Under a major disaster declaration (FEMA-4728-DR-IL) signed by former President Biden on August 15, 2023, Cook County was designated as adversely affected by the disaster and became eligible for Individual Assistance (IA) and Hazard Mitigation Grant Program (HMGP) funding. Similarly, on November 20, 2023, the President signed another major disaster declaration (FEMA-4749-DR-IL), making Cook County eligible for IA and HMGP funding.

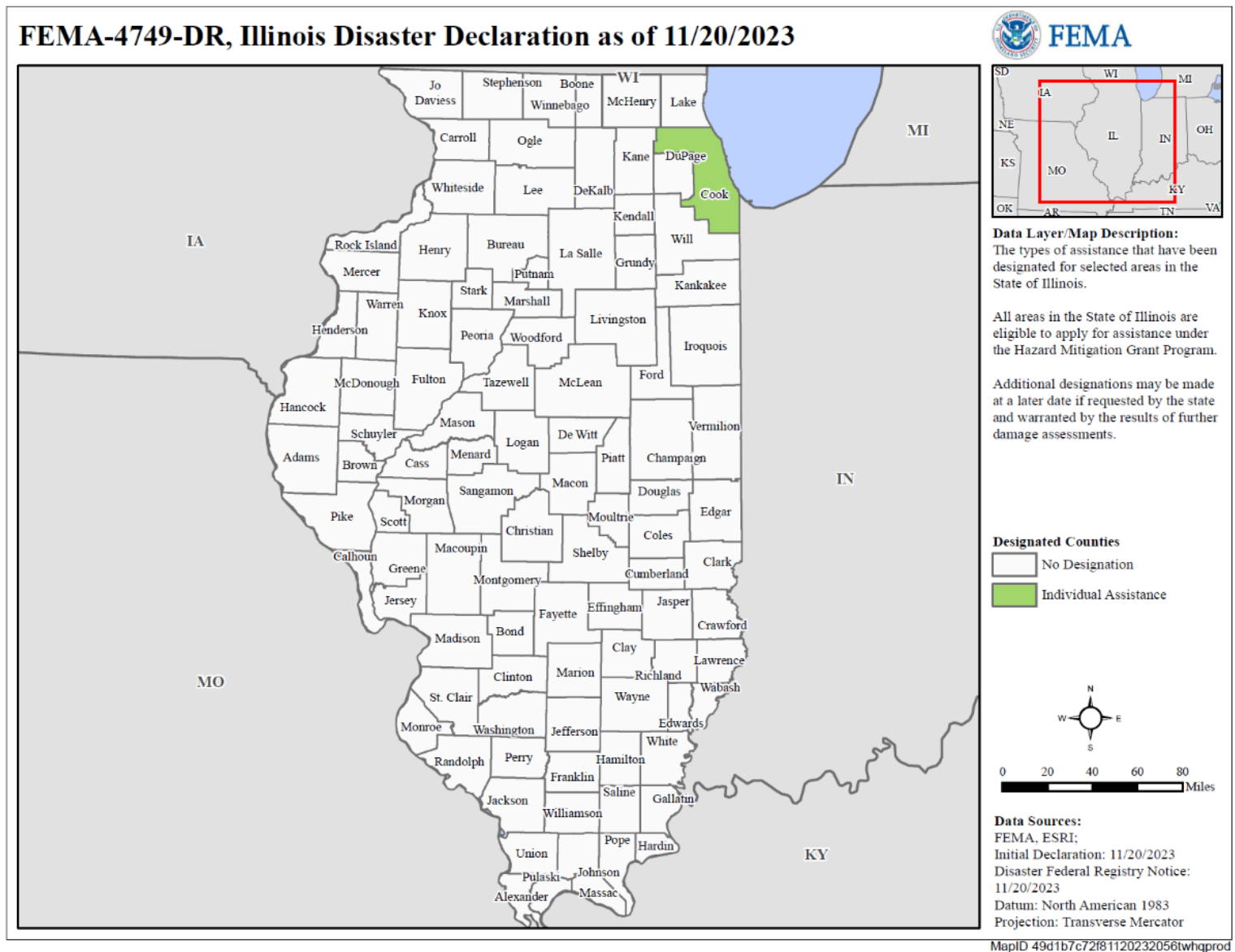
On September 20, 2024, former President Biden signed a major disaster declaration (FEMA-4819-DR-IL), authorizing FEMA's IA program for seven counties in Illinois, including Cook County and the City of Chicago.

Figure 5: FEMA-4728-DR, Illinois as of 10/23/2023



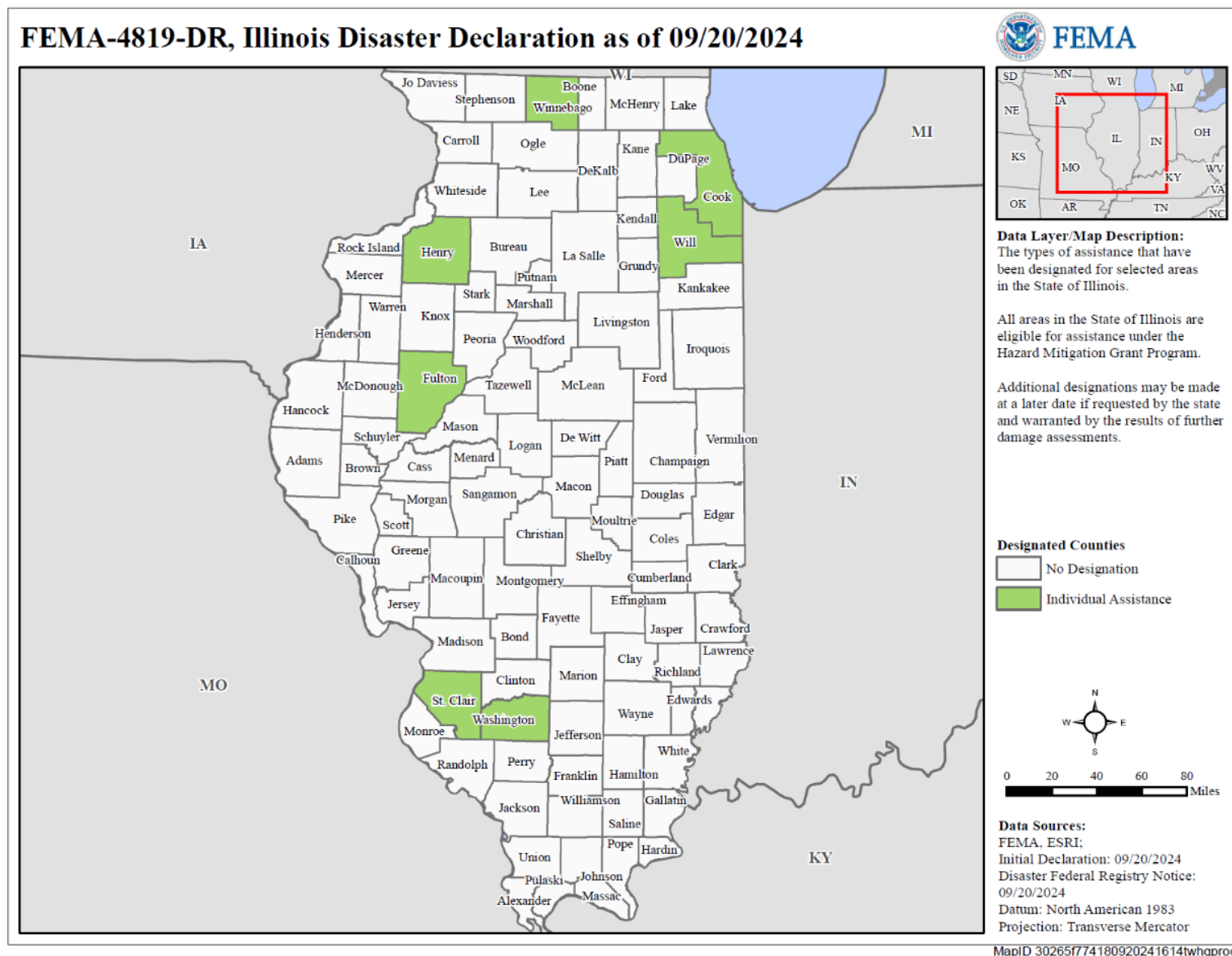
Reference: [4728](#) | [FEMA.gov](#)

Figure 6: FEMA-4749-DR, Illinois as of 11/20/2023



Reference: 4749 | FEMA.gov

Figure 7: FEMA-4819-DR, Illinois as of 9/20/2024



Reference: 4819 | FEMA.gov

Given the severity of the storms and the resulting damage to critical infrastructure, along with the ongoing risks and impacts to the public, county and state emergency management officials took the necessary response and recovery measures to safeguard the health, safety, and welfare of the citizens. Those response and recovery measures became even more critical as Cook County faced consecutive disasters, resulting in over 14 inches of floodwater from all events.

1.2.1 Most Impacted and Distressed Areas

1.2.1.1 HUD-identified MID Areas

HUD requires CDBG-DR funds to be used to address unmet needs in the Most Impacted and Distressed (MID) areas resulting from qualifying disasters. Cook County is required to spend 100% of its CDBG-DR funds to benefit the HUD-identified MID areas. According to the Allocation Announcement Notice (AAN), HUD has identified all of Cook County as the MID area.

1.3 Overview of the Impacts of the Qualifying Disaster

Between June 2023 and July 2024, Cook County, Illinois, experienced multiple severe storms and flooding events. The first event, from June 29 to July 2, 2023, resulted in \$500 million in property damage but fortunately caused no injuries or deaths. Another storm on September 17, 2023, led to \$50 million in property damage, again with no injuries or fatalities. The most devastating event occurred from July 13 to July 16, 2024, causing extensive property damage estimated at approximately \$5 million.² Many homes suffered roof damage, broken windows, and flooding, with some structures completely destroyed by tornadoes. Additionally, roads, bridges, and public utilities were affected, leading to significant disruptions in transportation and services. In general, all three events caused widespread flooding damage to both residential and commercial properties, resulting in waterlogged basements and structural issues.

Table 1: Disaster Overview

Disaster Summary	
Qualifying Disasters:	<ol style="list-style-type: none"> 1. Illinois Severe Storms and Flooding DR-4728-IL <i>Incident Period:</i> June 29, 2023–July 2, 2023 <i>Declaration Date:</i> August 15, 2023 2. Illinois Severe Storms and Flooding DR-4749-IL <i>Incident Period:</i> September 17, 2023–September 18, 2023 <i>Declaration Date:</i> November 20, 2023 3. Illinois Severe Storms, Tornadoes, Straight-line Winds, and Flooding DR-4819-IL <i>Incident Period:</i> July 13, 2024–July 16, 2024 <i>Declaration Date:</i> September 20, 2024
HUD-Identified MID Areas:	All of Cook County

² [Disaster Proclamations for July Tornadoes and Storms | Emergency Management and Regional Security](#)

Grantee-Identified MID Areas	N/A
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Table 2: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	\$212,315,000
CDBG-DR Mitigation Set Aside:	\$31,847,000
Total Allocation:	\$244,162,000

Table 3: Unmet Needs and Proposed Allocations

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % Expended in HUD and Grantee MID Areas	Estimated % to LMI
Administration	\$12,208,100	5%			
Planning	\$7,324,860	3%	100%		
Housing	\$73,248,600	30%	100%	100%	90%
Infrastructure	\$151,380,440	62%	100%	100%	73%
Economic Revitalization	\$0	0%			
Public Service	\$0	0%			
Exempt Public Service	\$0	0%			
CDBG-DR Mitigation Set-Aside*	\$0	0%			
Total	\$244,162,000	100%	100%	100%	79%
% of Total	100%	100%	100%	100%	79%

*All programs incorporate activities that mitigate flood risk, therefore the County will meet its mitigation set-aside minimum through its recovery programs, and is not allocating CDBG-DR funds to a stand-alone mitigation program.



2

Unmet Needs Assessment

2 Unmet Needs Assessment

2.1 Overview

The information collected through the unmet recovery and mitigation needs assessment process serves as the foundation for the County's Community Development Block Grant – Disaster Recovery (CDBG-DR) program funding and prioritization decisions. The County will continue assessing disaster recovery needs and, if warranted, will update this assessment and adjust the allocation plan to address those needs.

To prepare the unmet needs assessment, the Cook County Department of Planning and Economic Development (DPD) consulted with and drew on data from the following sources:

- U.S. Department of Housing and Urban Development (HUD)
- Federal Emergency Management Agency (FEMA)
- U.S. Army Corps of Engineers (USACE)
- Small Business Administration (SBA)
- U.S. Census Bureau
- U.S. National Oceanic and Atmospheric Administration (NOAA)
- Cook County Department of Emergency Management and Safety Services (DEMRS)
- Metropolitan Water Reclamation District (MWRD)
- Chicago Metropolitan Agency for Planning (CMAP)
- Cook County Disaster Impacts Survey

Table 4: Unmet Needs and Proposed Allocations

Eligible Cost Category	Unmet Need	% of Unmet Need	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Rental Housing	\$19,257,179	7.9%	\$48,832,400	20.0%
Owner-Occupied Housing	\$0	0.0%	\$24,416,200	10.0%
Infrastructure	\$224,711,642	92.1%	\$151,380,440	62.0%
Economic Revitalization	\$0	0.0%	\$0	0.0%
Public Service (15% cap)	\$0	0.0%	\$0	0.0%
Planning (15% cap)	N/A	N/A	\$7,324,860	3.0%

Administration	N/A	N/A	\$12,208,100	5.0%
Total	\$243,968,821	100.0%	\$244,162,000	100.0%

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

The table below identifies losses across all categories (housing, economic development, and infrastructure) before and after adjusting for identified funding sources. The unmet needs are calculated by subtracting the resources available from the value of the total damages. The County also assessed unmet needs of unhoused populations and need for public services. At the time of development of this Action Plan, there was no data illustrating unmet needs of homeless populations or shelters. There was no information to support unmet disaster-related needs for public services. The County presumes that due to the infrastructure failure, there are likely needs for recovery in these sectors, and plans to continue updating the needs information in the future. If warranted, the County is prepared to allocate funds from this grant to activities that benefit homeless populations and provide other public services.

Table 5: Quantified Disaster Impacts and Exacerbated Preexisting Needs of Housing, Infrastructure, and Economic Development; Other Financial Assistance; and Remaining Unmet Need

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A - B Unmet Need
Emergency Shelters, Interim, and Permanent Housing	\$0	\$0	\$0
Rental Housing	\$46,919,347	\$27,662,168	\$19,257,179
Owner-Occupied Housing	\$325,700,483	\$391,269,564	\$0
Public Housing and Other Affordable Housing	\$0	\$0	\$0

Infrastructure	\$642,508,344	\$417,796,702	\$224,711,642
Economic Development	\$22,046,715	\$38,194,707	\$0
Public Service	\$0	\$0	\$0
Total	\$1,037,174,889	\$874,923,141	\$243,968,821

2.2 Housing Unmet Needs

2.2.1 Disaster Damage and Impacts

A majority of the impacts from the disaster that affected housing are from flooding, sewer backups, and effects from sewers at capacity, highlighting the fundamental interdependence between housing and infrastructure. In this case, the inability of the stormwater infrastructure to perform its protective function translated into direct impact to households, property, and habitability. Infrastructure does not simply support housing; it enables it, and its failure to function directly impacts it. The unmet need in housing cannot be fully understood or addressed without acknowledging the role of infrastructure systems in either protecting or compromising residential structures. This further reinforces the need for coordinated investments that address both sectors as a part of the same housing system.

The Housing Unmet Needs Analysis evaluates the scale and distribution of housing-related damages caused by the disasters, the extent of assistance provided, and the remaining unmet need in Cook County. This section analyzed data from FEMA's Individual Assistance (IA) program, the Small Business Administration (SBA) Disaster Home Loan Program, and National Flood Insurance Program (NFIP) data to quantify the unmet needs of both owner-occupied and renter-occupied households. The analysis considers real and personal property damage, occupancy type, assistance received, and financial need due to underinsurance or ineligibility for assistance.

This assessment also includes data describing housing market conditions to better understand needs of the community for safe and affordable housing, which have factored into Cook County's decisions. Data from Regional Housing Solutions, American Community Survey, and the Cook County Survey data were all taken into consideration in this analysis.

Not all households requested assistance from FEMA IA or SBA, or received insurance payments, potentially leaving a gap between the impact recorded and the true impact of the disaster. While many affected households received timely and adequate support according to the FEMA repair assistance, some gaps remain, particularly among underinsured renter-occupied households and renters without additional insurance. The additional unmet need for renters is \$19,257,179, while there is no unmet need for owner-occupied households. The County will continue assessing the needs of households using updated FEMA and SBA data, and through outreach in communities. Should the assessment

identify persistent disaster-related needs, the County is prepared to allocate resources to address those needs.

Table 6: Housing Unmet Need

Housing Unmet Need	
Housing Need Identified - Owner	\$325,700,483
Housing Need Identified - Renter	\$46,919,347
Total Housing Need Identified	\$372,619,830
Disaster Award and Funding Sources	
<i>Funding Source</i>	<i>Disaster Award Amount</i>
FEMA Individual Assistance - Owner	\$391,269,564
FEMA Individual Assistance - Renter	\$27,662,168
SBA Disaster Loans	\$111,002,849
National Flood Insurance Program	\$935,347
Total	\$530,869,928
Unmet Need Calculation	
Housing Unmet Need - Owner	\$0
Housing Unmet Need - Renter	\$19,257,179
Total Unmet Need	\$19,257,179

Source: FEMA Individual Assistance Dataset, March 2025

Table 7: Cook County Household Damage by Municipality

Town Name	Total # of Households	Damaged Households	Percentage Households Damaged of Total Households in Township	Percentage Households Damaged of Total Homes Damaged in Qualifying Disasters
Cicero township*	25,031	6839	27.32%	26.69%
Calumet township	7,548	3,948	52.31%	15.41%
Bloom township	30,432	3722	12.23%	14.53%
Thornton township	59,032	6143	10.41%	23.98%
Berwyn township	20,222	1838	9.09%	7.17%
Rich township	29,338	874	2.98%	3.41%
Bremen township	39,897	752	1.88%	2.93%
Proviso township	55,313	857	1.55%	3.34%

Norwood Park township	10,180	82	0.81%	0.32%
River Forest township	4,275	17	0.40%	0.07%
Evanston city	31,387	59	0.19%	0.23%
Lemont township	8,068	11	0.14%	0.04%
Lyons township	43,058	50	0.12%	0.20%
Barrington township	5,691	7	0.12%	0.03%
Worth township	57,927	64	0.11%	0.25%
Leyden township	33,057	36	0.11%	0.14%
Orland township	37,492	38	0.10%	0.15%
Palos township	22,035	14	0.06%	0.05%
Niles township	40,088	18	0.04%	0.07%
Hanover township	33,247	12	0.04%	0.05%
Chicago city*	1,146,547	195	0.02%	0.76%
Maine township	52,437	11	0.02%	0.04%
Schaumburg township	50,495	9	0.02%	0.04%
Elk Grove township	37,905	7	0.02%	0.03%
Palatine township	44,354	7	0.02%	0.03%
Oak Park township	23,267	5	0.02%	0.02%
Wheeling township	61,073	4	0.01%	0.02%
New Trier township	20,472	3	0.01%	0.01%
Northfield township	34,674	0	0.00%	0.00%
Riverside township	6,202	0	0.00%	0.00%
Stickney township	13,834	0	0.00%	0.00%

*Denotes individual CDBG-DR allocation from HUD

Source: [FEMA Individual Assistance Dataset](#), March 2025

Calumet Township has the highest percentage of damaged households, with 52.31% affected. Cicero township, and the City of Chicago both received their own individual CDBG-DR allocation from HUD.

2.2.1.1 FEMA Individual Assistance | Owner-Occupied Housing

The table below reflects disaster impact and recovery data for 105,323 total owner-occupied applicants. Homeowners experienced a significant total verified loss of \$325,700,483, with an average verified loss of \$3,809. Of the 105,323 applicants, 95,665 resulted in FEMA inspections, indicating a high inspection rate of approximately 90.83%. Of those inspections, 85,516 (or 81.19%) showed verified damage; however, only 17,642 (16.75%) received assistance. This suggests the disasters did not have a catastrophic impact on homes but that many impacted homes had minor damage and the majority were able to recover with other sources of funding, such as insurance. Overall, the flooding impact was

minor to moderate damage across a broad region, not catastrophic damage in concentrated areas. This indicates the systemic inadequacy of current infrastructure and the critical need for upgrades with the increasing and more prevalent threat of storms causing inland flooding.

Table 8: FEMA Individual Assistance, Owner-Occupied

County	# of Applicants	# of Inspections	# of Inspections With Damage	# Received IHP (Individuals and Households Program)	Total FEMA Verified Loss	Avg FEMA Verified Loss
Cook	105,323	95,665	85,516	17,642	\$325,700,483	\$3,809

Source: [Individuals and Households Program - Valid Registrations - v1 | FEMA.gov](#)

2.2.1.2 FEMA Individual Assistance | Renter-Occupied Housing

Out of 65,748 total renter applications, 60,777 inspections were conducted, an inspection rate of over 92%. However, only 38,674 inspections (63%) showed verified damage, a much lower damage rate compared to owner-occupied units primarily due to the differences between real and personal property loss calculations and awards.

Among renters with personal property verified damage, only 13,056 received FEMA assistance, representing 33% of those with damage and just 19% of all renter applicants. This drop-off represents the difference in how FEMA verifies real and content losses for owners versus renters. HUD research has found that such mechanisms can result in disparities in recovery timelines of renters and owners. Often, those from socioeconomically vulnerable populations, such as lower-income households, and renters may experience barriers when trying to participate in federal recovery programs (<https://www.gao.gov/assets/gao-22-104039.pdf>). Typical barriers include renters who didn't have formal rental agreements or those living in homes that they didn't own when the disaster happened, overly burdensome eligibility criteria, or inadequate payment amounts to cover the need. FEMA generally does not take savings or income into account when the determination is made to award funds to a household after a disaster, which can have a significant adverse impact on lower-income renters. HUD, therefore, strongly encourages CDBG-DR grantees to carefully consider the recovery needs of tenant households and the rental housing market.

Table 9: FEMA Individual Assistance, Renter

County	# of Applicants	# of Inspections	# of Inspections With Damage	# Received IHP	Total FEMA Verified Loss	Avg FEMA Verified Loss
Cook	65,748	60,777	38,674	13,056	\$46,919,347	\$1,213

Source: FEMA Individual Assistance Dataset, March 2025

2.2.1.3 FEMA Individual Assistance | Applications by Housing Type

The data reflects a total of 171,888 disaster applications, offering insight into structure type and occupancy status, percentage owner-occupied, percentage renter-occupied, and unknown. The highest percentage of applicants for owner-occupied and rental-occupied are houses/duplexes, followed by tenants living in apartments.

Table 10: FEMA Individual Assistance, Applications by Housing Type

Residence Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	25,441	0.2%	14.6%	0.1%	14.8%
Assisted Living Facility	35	0.0%	0.0%	0.0%	0.0%
Boat	2	0.0%	0.0%	0.0%	0.0%
College Dorm	1	0.0%	0.0%	0.0%	0.0%
Condo	1,767	0.7%	0.3%	0.0%	1.0%
Correctional Facility	7	0.0%	0.0%	0.0%	0.0%
House/Duplex	135,133	57.9%	20.4%	0.3%	78.6%
Military Housing	8	0.0%	0.0%	0.0%	0.0%
Mobile Home	718	0.2%	0.2%	0.0%	0.4%
Other	2,941	0.8%	0.8%	0.1%	1.7%
Townhouse	5,815	1.5%	1.9%	0.0%	3.4%
Travel Trailer	20	0.0%	0.0%	0.0%	0.0%
Grand Total	171,888	61.3%	38.3%	0.5%	100.0%

Source: FEMA Individual Assistance Dataset, March 2025

2.2.1.4 FEMA IA | Real Property Damage – Owner-Occupied Units

Table 11: FEMA Individual Assistance, Owner-Occupied Units

County	Minor - Low	Minor - High	Major - Low	Major - High	Severe
Cook	29,718	28,202	6,718	873	52

Source: [FEMA Individual Assistance Dataset, March 2025](#)

Table 12: FEMA Individual Assistance, Real Property Damage, Owner-Occupied Units

County	Minor - Low	Minor - High	Major - Low	Major - High	Severe
Cook	\$54,369,636	\$128,236,644	\$71,915,247	\$16,471,651	\$1,943,860

Source: [FEMA Individual Assistance Dataset, March 2025](#)

2.2.1.5 FEMA IA | Real Property Damage – Renter-Occupied Unit

Table 13: FEMA Individual Assistance, Renter-Occupied Units

County	Minor - Low	Minor - High	Major - Low	Major - High	Severe
Cook	24,167	7,867	3,761	2,544	335

Source: [FEMA Individual Assistance Dataset, March 2025](#)

The damage severity data categorizes impacted units into two tiers “major high and severe” (indicating substantial structural damage or uninhabitable conditions) and “minor low to major low” (less severe damage still eligible for assistance). Overall, there were only 335 units classified as having severe damage, and 24,167 with minor-low damage. Out of the 3,038 apartments receiving major to severe damage, only 7 had flood insurance, indicating that renters and landlords may not have adequate insurance coverage. Similarly, out of the homes/duplexes that are categorized in the major/severe category that housed renters, only 13 had flood insurance.

The majority of damage was listed in the minor-low category, with the lowest amount listed in the severe category. This indicates that the level of damage was not substantial and not concentrated, indicating a need for infrastructure upgrades to support housing throughout Cook County.

Table 14: FEMA Individual Assistance, Personal Property Damage, Rental Units

County	Minor - Low	Minor - High	Major - Low	Major - High	Severe
Cook	\$10,759,277	\$10,905,187	\$9,784,524	\$12,502,777	\$2,967,582

Source: [FEMA Individual Assistance Dataset, March 2025](#)

2.2.1.6 National Flood Insurance Program | Total NFIP Payments

Table 15: Total Payments from National Flood Insurance Program



County	# of Homeowners	Payment for Building	Payment for Contents	Total Payment
Cook	136	\$560,658	\$374,689	\$935,347

Source: National Flood Insurance Program

136 homeowners filed insurance claims to the National Flood Insurance Program, covering roughly \$935,347 in flooding damage. Without requesting information directly from homeowners and renters applying to programs, it will be difficult for the County to know specifically what homeowners and renters received from insurance policies. If new data becomes available, Cook County will update needs and program allocations.

Table 16: Flood Insurance Analysis

No. of Applicants without Flood Insurance	No. of Applicants without Flood Insurance Sustained Damage	Total Loss Amount without Flood Insurance Sustained Damage	No. of Applicants with Flood Insurance	No. of Applicants with Flood Insurance Sustained Damage	Total Loss Amount with Flood Insurance Sustained Damage
63,479	46,666	\$131,413,403.77	1,454	1,080	\$3,233,451.00

Source: FEMA Individual Assistance Data

The data above indicates a significant divide between insured and uninsured applicants affected by flood damage which highlights the critical importance of flood insurance in reducing household financial vulnerability during disaster recovery. Out of the total (105,323) applicants for assistance, 63,479 did not have flood insurance (60.27%). Within this uninsured group, 46,666 applicants experienced verified real or personal property flood damage, illustrating that a substantial portion of those without coverage also sustained tangible losses.

In contrast, only 1,454 applicants (1.3%) reported having flood insurance, and 1,080 of them sustained verified flood-related losses. This lower rate of coverage, even among those who experienced damage, highlights a lack of financial protection when faced with flooding or severe storm events.

Significant financial implications of this coverage gap are depicted in the table above. Uninsured applicants accounted for \$131.4 Million in verified flood related losses, meanwhile insured applicants sustained \$3.23 Million in losses. These findings depict the need for supporting Cook County residents without the resources to adequately recover, and support recovery programs which are designed to support uninsured households.

2.2.1.7 Small Business Administration | Total Disaster Home Loans Approved

The Small Business Administration provides low-interest loans to homeowners who have suffered damage from natural disaster events in order to help the homeowner recover more swiftly. After a

homeowner applies for a loan from the SBA, the loan undergoes an approval process and, upon approval of the loan application, an amount is determined and presented to the applicant. From here, the homeowner can accept the terms of the loan or decide to cancel their loan and decline the funds.

Per data received from SBA, applicants who submitted or completed an application recorded a total verified loss of \$151,925,971 in Cook County. Of that amount, \$111,002,849 in loans were issued.

Table 17: Small Business Administration, Home Loans

County	No. of Home Loans	Total Verified Loss	Total Loan Amount
Cook	4,153	\$151,925,917	\$111,002,849

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

As part of Cook County's Disaster Recovery program design, the County conducted a preliminary needs assessment. This housing section encompasses the unmet needs assessment to further describe unmet needs specifically pertaining to affordable housing and explain the County's final program design for housing activities. Cook County will fund two housing programs, a Multifamily Affordable Housing Construction and Rehabilitation program and a Residential Flood Rehabilitation and Resilience program. These programs will be a component of the County's response to provide protection from future events through resilient projects, addressing the stabilization of existing affordable housing needs as well as increasing the number of affordable housing units that appeal to a range of household types. The County has a high number of persons where cost affordability is a pressing issue; coupled with the lack of affordable housing and inadequate infrastructure, that further solidifies the need for these two housing programs.

2.2.2 Public Housing and Affordable Housing

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

The portfolio can be broken down into two basic categories: insured and assisted. The three largest assistance programs for Multifamily Housing are Section 8 Project Based Assistance, Section 202 Supportive Housing for the Elderly, and Section 811 Supportive Housing for Persons with Disabilities. At the time of the development of this Action Plan, no landlords who participate in any of these programs reported any damages, and no program participants were displaced as a result of the storm(s). There is no data at this time indicating any physical damage to Housing Choice Voucher or Low-Income Housing Tax Credit (LIHTC) properties.



2.2.2.1 Multifamily HUD-Assisted Housing

Table 18: List of Multifamily HUD Assisted Housing in Cook County

City	No. of Properties	No. Of Units	No. Of Units Assisted	No. Of Units Waiting Assistance
Calumet township	1	180	180	0
Cicero township*	0	0	0	0
Bloom township	0	0	0	0
Thornton township	0	0	0	0
Berwyn township	1	28	5	0
Rich township	0	0	0	0
Bremen township	0	0	0	0
Proviso township	0	0	0	0
Norwood Park township	0	0	0	0
River Forest township	0	0	0	0
Evanston city	7	458	439	19
Lemont township	0	0	0	0
Lyons township	0	0	0	0
Barrington township	1	102	101	1
Worth township	0	0	0	0
Leyden township	0	0	0	0
Orland township	0	0	0	0
Palos township	0	0	0	0
Niles township	2	236	227	9
Hanover township	0	0	0	0
Chicago city*	308	1,676,367	1,473,996	202,371
Maine township	0	0	0	0
Schaumburg township	0	0	0	0

Elk Grove township	0	0	0	0
Palatine township	4	276	250	26
Oak Park township	4	276	250	26
Wheeling township	3	4	4	0
New Trier township	0	0	0	0
Northfield township	0	0	0	0
Riverside township	0	0	0	0
Stickney township	0	0	0	0

*Denotes direct CDBG-DR allocation from HUD

Source: [Multifamily Properties - Assisted | HUD Open Data Site](#)

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high-rise apartments for elderly families. HUD administers federal aid to local Public Housing Agencies (PHAs) that manage housing for low-income residents at rents they can afford. As of the time of release of the Action Plan, there is no information on the PHAs damaged or the number of assisted units damaged.

Table 19: PHAs in Cook County with Available and Occupied Units

Housing Authority Name	Place	Total Units	Section 8 (Occupied)	Public Housing Occupied	Total Occupied
Housing Authority of the Village of Oak Park	Oak Park Village	198	546	181	616
Housing Authority of Park Forest	Park Forest Village	0	143	0	143
Illinois Housing Development Authority	State of Illinois	0	0	0	0
Housing Authority of Cook County	Suburban Cook County	280	13229	178	13407

Chicago Housing Authority	Chicago (City)	19699	52480	12295	65810
Housing Authority of the Town of Cicero	Cicero	0	196	0	196

[Public Housing Authorities | HUD Open Data Site](#)

2.2.2.2 HUD-Assisted Housing Impacted by the Disaster

Table 20: HUD Assisted Housing Impacted by Disaster

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units
Cook County	512		54,749		178	

Source: HUD LIHTC Database [huduser.gov] 

At the time of the development of this Action Plan, there was no data which indicated that physical damage was done to Housing Choice Voucher or LIHTC properties, additionally there was no data that indicates that any program participants were displaced as a result of the disaster(s).

2.2.3 Emergency Shelters, Interim, and Permanent Housing

It has been widely recognized that disasters have significant impacts on housing options for people experiencing homelessness. The Cook County Continuum of Care (CoC) works to provide a collaborative homelessness response by funding service agencies that operate within Cook County. At the time of development of this Action Plan, there was no data that indicated the direct impact of the disaster on the homeless population; however, it is presumed that due to the infrastructure failure, the homeless population did suffer adversely due to the disaster(s).

Table 21: Affected Continuum of Care Entities

CoC Number	CoC Entity	Impacted County	Homeless Count
IL-511	Cook County CoC	Cook County	1,188

Table 22: Summary of All Available Beds | Cook County Continuum of Care

Household Type	Family Units	Family Beds	Adult Only Beds	Child Only Beds	Total Yr-Round Beds
Emergency Shelter	118	410	386	5	801
Safe Haven	0	0	29	0	29
Transitional Housing	99	274	98	0	372
Total Unsheltered Housing	217	684	513	5	1,202

The County works alongside service providers and other stakeholders to help strategize collaborative solutions to homelessness and to expand capacity to meet the needs of those experiencing homelessness. The table below shows that in the 2024 Point-in-Time Count, which is an annual census of people experiencing homelessness, the Cook County CoC identified 1,188 individuals as meeting the definition of homeless in Cook County. Most people were in emergency shelter (788) or transitional housing programs, but 114 were unsheltered, meaning they were camping, sleeping in cars, or otherwise on the street.

Table 23: Point-in-Time Count – Type of Shelter

Scale of Data	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Cook County	788	286	114	1,188

Source: [CoC PopSub CoC IL-511-2024 IL 2024.pdf](#)

Table 24: Point-In-Time Count – Household Type

Household Type	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Households without children	335	79	111	525
Households with at least one adult and one child	125	68	1	194
Households with only children	2	0	0	2

Total Homeless Households	462	147	112	721
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Source: [CoC PopSub CoC IL-511-2024 IL 2024.pdf](#)

2.2.4 Cook County Housing Market Analysis

A comprehensive understanding of Cook County's housing supply requires examining not only the total number of housing units but also where those units are located, who lives in them, their condition, and their age. The most recent data reveals there are 2,270,349 housing units (B25002: Occupancy Status - Census Bureau Table), with 754,757 owner-occupied housing units with a mortgage. A high percentage of these households have monthly costs over \$3,000 or more. However, quantity alone does not capture the full picture of housing needs across the County.

Homeownership has long been recognized as a key pathway to building generational wealth and long-term stability. In Cook County there is a higher percentage of owner-occupied households than renter households, with a percentage of 57.5% of all households. Repeated flooding events put an additional strain on homeowners and renters, particularly those with insufficient income or savings, lack of access to credit, high insurance premiums, or lack of insurance. The FEMA individual assistance number of households that received individual housing assistance is 17,642 with an average verified loss of \$3,809. The percentage of renter-occupied households is less than owner-occupied in Cook County. The total number of renter-occupied households who received assistance is 10,896 with a FEMA total verified loss of \$6,753,509.

The Chicago Metropolitan Area Planning (CMAP) Region contains the following counties: McHenry, Lake, Kane, DuPage, Kendall, Will and Cook Counties. Cook County has a higher percentage of renter-occupied households compared to the CMAP region, which comparatively has a higher percentage of owner-occupied households compared to renter households in the area. This could indicate a housing affordability issue. Many residents in Cook County turn to renting because there are little to no affordable or suitable (older homes, homes in disrepair) purchase options, which forces potential homeowners to locate outside of the County. Renters can also face a barrier to ownership such as income relative to median housing costs. The table below indicates that over a third of households are housing cost burdened, defined as paying over 30% of income on housing expenses. Nearly a third of households in Cook County are low- or moderate-income (LMI), meaning they earn 80% of the Area Median Income or less. HUD requires that Cook County allocate a minimum of 70% of its CDBG-DR grant to activities that benefit LMI households.



Table 25: Cook County Household Income and Housing Cost Burden

Community Area	Average Median Household Income	Percent of LMI Households in Area	Share of Households that are Cost-Burdened	Median Year Housing was Built
Cook County	\$80,579	34.4%	34.0%	1964

2.2.4.1 Housing Tenure

Table 26: Housing Tenure, Cook County 2023

Cook County	Count	Percentage	CMAP Region	Count	Percentage
Owner-occupied	1,198,834	57.5	Owner-occupied	2,116,804	64.6
Renter-occupied	885,744	42.5	Renter-occupied	1,159,292	35.4
Total occupied households	2,084,578	100.0	Total occupied households	3,276,096	100.0

Source: American Community Survey 5-year estimates. B25003-Tenure

2.2.4.2 Housing Affordability

Cost affordability for renters is generally defined by HUD as 30% of a household income, including rent and utilities. According to the table below, there is a large number of households that pay more than 30% of their household income for gross rent, including 207,644 households at 50.05% or more. Cook County has a high share of rent-burdened households, like many other counties in the country, particularly for the number of severe rent-burdened households (which is the number of households paying 50% or more of their income towards rent. Cost affordability becomes particularly challenging following disasters because the cost of repairs increases household costs and the availability of units decreases, thus putting additional strain on already burdened households and housing supply chain.

Table 27: Gross Rent as a Percentage of Household income, Cook County

Percentage	Estimate
Less than 10%	36,110
10-14.9%	77,223
15-19.9%	110,974



20.0-24.9%	111,639
25.0-29.9%	96,049
30-34.9%	72,332
35-39.9%	50,657
40.0-49.9%	68,419
50.05% or more	207,644
Not Computed	54,697
Total:	885,744

Source-American Community Survey 2023: ACS 5-Year estimates

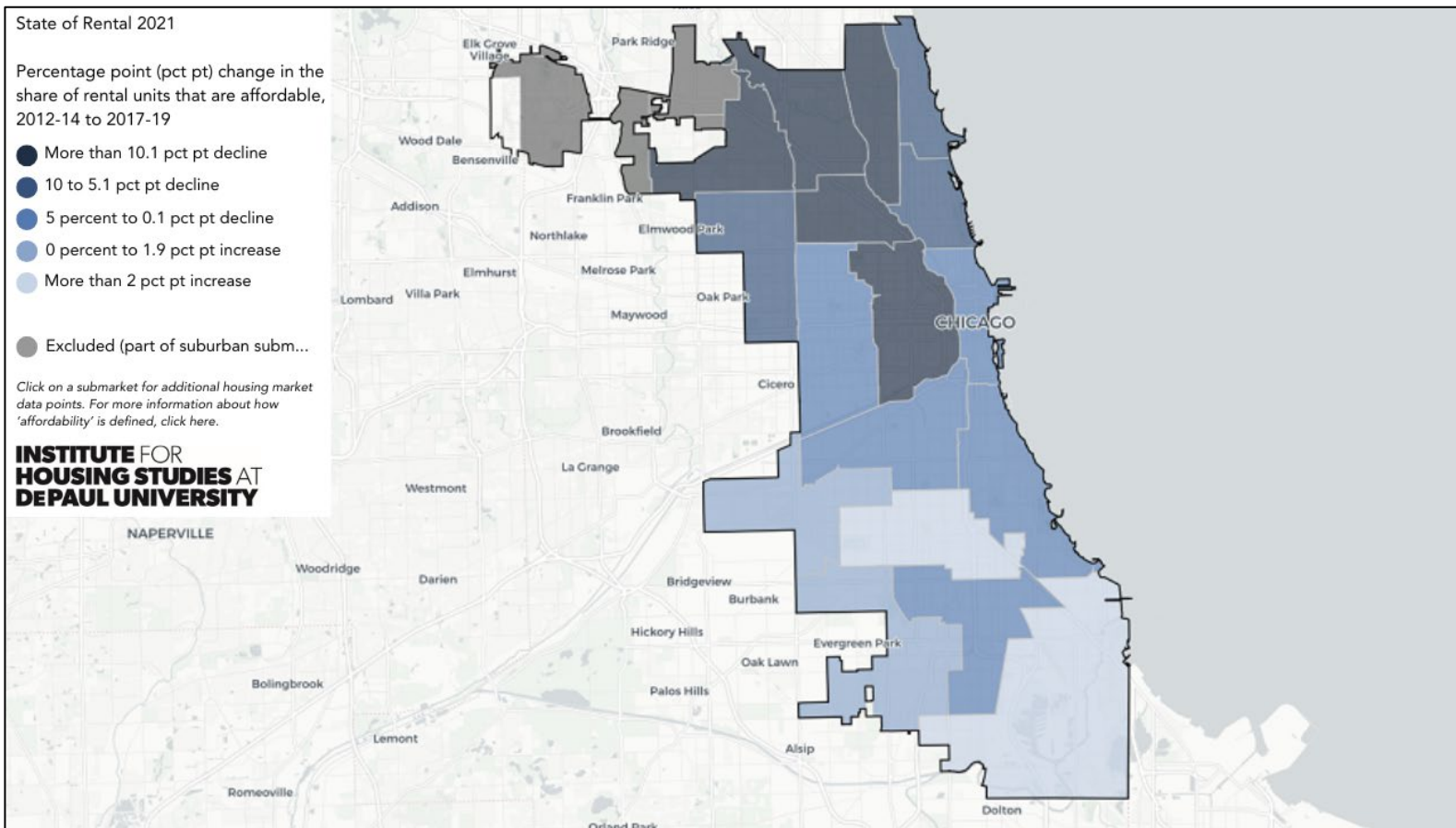
Table 28: Gross Rent for Occupied Units Paying Rent, Cook County

Gross Rent	2019-2023 Estimates	2014-2018 Estimates
Less than \$500	6.3%	6.3%
\$500-\$999	16.6%	17.8%
\$1,000-\$1,499	34.7%	38.8%
\$1,500-\$1,999	21.0%	19.2%
\$2,000-\$2,499	11.2%	10.1%
\$2,500-\$2,999	5.1%	4.5%
\$3,000 or more	5.2%	4.0%
Median (dollars)	1,381	1,328
No rent paid	28,841	24,399

Source: American Community Survey 2023: ACS 5-year estimates

Gross rents are increasing for the higher rental amounts. For example, the percentage of renters paying gross rental amounts for \$2,000 or more has increased one percentage point, while the lower-scale rents are decreasing by approximately one percentage point between 2014-2018 estimates and 2019-2023 estimates. Gross rents are increasing for renters, thus placing more burden on renter households.

Figure 8: Rental Housing Affordability



Source: [2021 State of Rental Housing in Cook County - Home - Institute for Housing Studies - DePaul University](#)

DePaul University released a State of Rental Housing in Cook County, which updates key data on changing rental demand, the current supply of rental housing, and how these dynamics affect access to rental housing for Cook County's lowest-income households. The map above describes the percentage change in the share of rental units that were affordable from 2012-2014 to 2017-2019. This indicates the significant decline of affordability in Cook County. Affordability becomes particularly problematic when storm events occur because rents often increase due to the increased demand of rental housing.

2.2.4.3 Age of Housing Stock

Table 29: Year Housing Structure Built, Cook County

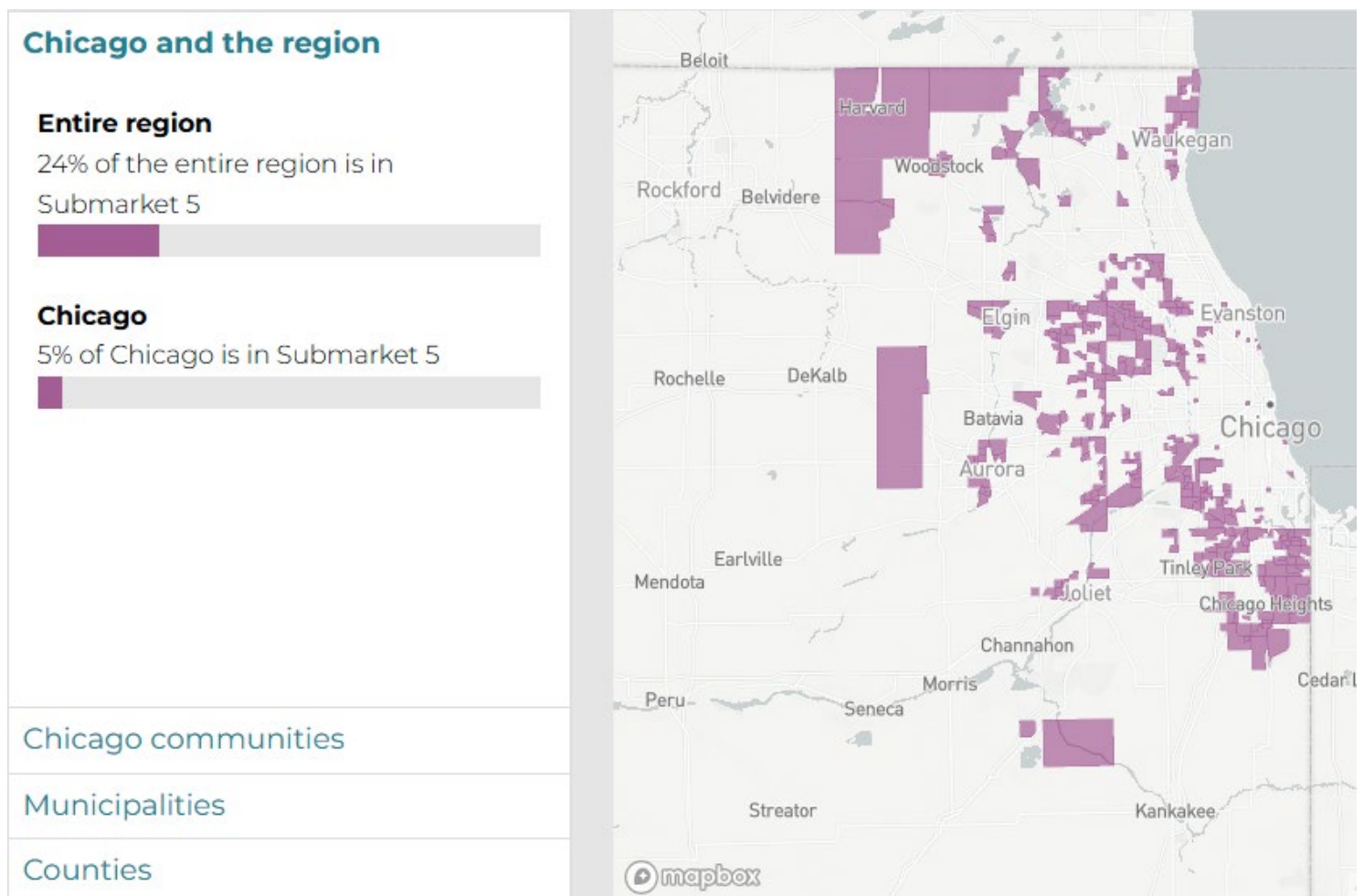
Year Structure Built	Occupied Housing units	Owner-occupied housing units	Percentage owner-occupied units	Renter-occupied units	Percentage renter-occupied units
2020 or later	19,014	6,982	0.6%	12,032	1.3%
2010 to 2019	104,677	34,492	2.8%	70,185	7.9%
2000 to 2009	164,862	103,894	8.5%	60,968	6.8%
1999 to 1980	301,274	167,145	13.7%	134,129	15.0%
1979 to 1960	517,466	303,799	24.8%	213,667	23.9%
1959 to 1940	442,635	299,972	24.5%	142,663	16.0%
1939 or earlier	567,156	307,515	25.1%	259,641	29.1%

Source: [Cook County - Census Bureau Tables](#)

High percentages of owner-occupied and rental housing stock are pre-1979. Additionally, according to [Cook County Regional Housing Solutions](#) a high percentage of Cook County is suburban 1960-79 housing stock, and the occupants have moderate but declining incomes. Aging housing stock can become challenging for occupants, particularly those who are cost burdened. When storm events occur, older homes become vulnerable to flooding and, in some communities of Cook County, the cost of renovation or making repairs to make the home or household unit habitable may exceed the value of the home or available rehabilitation resources. In submarket 1 (South and West Chicago, Waukegan, Joliet and south suburban Cook County) identified by Cook County Regional Housing Solutions, some properties are in very poor physical condition, which makes it difficult to renovate them with limited public sector resources and unfeasible with private resources. Homeowners have a difficult time getting financing from banks, and banks struggle to underwrite renovation loans when the cost to bring a property up to a reasonable level of repair exceeds the potential sale price for the renovated home. This coupled with an old housing stock with poor infrastructure regularly exacerbates the damage during more frequent storm events, causing inland flooding.

24% of the entire region of Cook County is located in submarket 5, which is characterized as suburban 1960-79 housing stock, moderate but declining incomes, and lower-cost housing stock with increases in housing cost burden due to considerable declines in income and high transportation costs. Despite homes being largely owner-occupied, there are high levels of renters and subsidized housing relative to other suburban submarkets³. Submarket 5 - Regional Housing Solutions. It is important to continue to support these older homes and their infrastructure to ensure that the inland flooding does not overwhelm the infrastructure and continue to damage these homes. Without this support, impacted residents continue to have to pay for costly repairs that may not be covered by insurance or temporarily reside in hotels, shelters, or with relatives or friends.

Figure 9: Submarket 5 Identified by Regional Housing Solutions



Source: Regional Housing Solutions

³ <https://www.regionalhousingsolutions.org/submarket/5>

2.3 Infrastructure Unmet Needs

Despite impacts to the region's public facilities and infrastructure, Cook County did not receive FEMA public assistance (PA) for any of the major disasters occurring in 2023 and 2024. Though Cook County received FEMA Individual Assistance (IA) to support residents affected by the disasters, the County did not meet the necessary impact thresholds to receive FEMA PA. FEMA PA provides funding for repair and replacement of public facilities and infrastructure as well as assistance for emergency response activities. PA is often provided to states and local jurisdictions following major disasters; however, the lack of this assistance to Cook County following three major disaster declarations has exacerbated pressure on the County to meet the need for repair and upgrades to the region's infrastructure.

Damage to homes and communities resulted primarily from inadequate infrastructure systems that were overwhelmed by excessive precipitation. In the last 15 years, 6 of 11 major disasters occurring in the region have involved pluvial flooding (inland flooding not caused by overflow of a body of water) and failures of local infrastructure (both private and public) to adequately absorb, store, or divert excessive precipitation. The County has long sought to mitigate this risk in order to reduce impacts of future flooding.⁴

During the disasters of 2023 and 2024, FEMA IA data indicates over 50,000 homes received at least moderate damage from the three disasters. The total cost of all damaged sustained by homes was \$372 million, according to FEMA verified loss information. Despite this, the average damage to owner-occupied homes was only \$3,809. The disasters impacted broad regions with moderate inland flooding of basements and lower levels of houses; however, impacts were concentrated in specific townships, where up to half of the total housing stock experienced some damage: Calumet (52%), Cicero (27%), Bloom (12 %), Thornton 10%), and Berwyn (9%). Together, these towns represent 80% of all homes damaged by the disasters (See Table 28). The repeated nature of flood impacts on these communities—as documented through FEMA applicant information and outreach to local residents and leadership and county-wide entities, as well as ongoing strategic planning and flood mitigation studies⁵—point to inadequate stormwater infrastructure as the primary driver of damage to housing, business and the community.

As recently as July 2025, the region was impacted by major torrential rain and resulting flooding resulting from inadequate flood management infrastructure.⁶ The City of Chicago and Cook County experienced significant rainfall over several days, leading to flooding in residential areas. The City of Chicago, Burbank, Justice and Summit were among the hardest hit Cook County municipalities. Preliminary surveys of damage impacts indicate over 3,000 homes were impacted, with nearly 600 experience major or severe damage.

⁴ FEMA Disasters and Other Declarations [fema.gov/disaster/declarations](https://www.fema.gov/disaster/declarations)

⁵ Metropolitan Water Reclamation District [Strategic Plan 2021-2025](#); Cook County [National Disaster Resilience Competition Phase 2 Application 2015](#); Cook County 2024 [Multi-Jurisdictional Hazard Mitigation Plan](#)

⁶ [The City of Chicago and Cook County Issue Disaster Proclamations for Flooding that occurred July 25-28 August 7, 2025](#)

Recurring flood impacts show that, had infrastructure functioned effectively, the most severe and costly impacts to these communities could be prevented. The County has previously analyzed avoided losses in the context of its past major flood disaster in 2013 (DR-4116) for which HUD previously allocated CDBG-DR grant funds. The comparison of disaster losses to an alternative disaster scenario with home and public infrastructure mitigation strategies in place indicates a 4.7:1 benefit-cost ratio, demonstrating the strategic recovery and resilience value to Cook County communities hardest hit by the 2023 and 2024 disasters.⁷ This highlights the need for infrastructure improvements as a means of housing and economic recovery from the disasters and to ensure public and private recovery investments are protected going forward. Repairing and improving upon the County's infrastructure, then, is addressing the needs of infrastructure as well as homes and businesses.

As the County has assessed the damage caused by these events and developed recovery priorities, improving stormwater infrastructure and private home flood risks in the most highly impacted areas have been identified as the most cost-effective means of responding to the recent disasters for which the CDBG-DR funds were awarded. Table 28 illustrates both the portion of homes damaged of all homes within that respective community and the portion of homes damaged in each community of all homes damaged by the three qualifying disasters. Specific communities, including townships of Calumet, and Thornton make up over half of all homes impacted by these disasters.

Table 30: Homes Damaged by Qualifying Disasters by Cook County Municipalities

Town Name	Total # of Households	Damaged Households	Percentage Households Damaged of Total Households in Township	Percentage Households Damaged of Total Homes Damaged in Qualifying Disasters
Calumet township	7,548	3,948	52.31%	15.41%
Cicero township*	25,031	6,839	27.32%	26.69%
Bloom township	30,432	3,722	12.23%	14.53%
Thornton township	59,032	6,143	10.41%	23.98%
Berwyn township	20,222	1,838	9.09%	7.17%

*Denotes direct CDBG-DR allocation from HUD

2.3.1 Overview of Infrastructure Unmet Needs

While much of the direct damage to streets, sewage systems, and other public facilities has been addressed through County and local resources in the months since the respective disasters, there is significant unmet need remaining for jurisdictions to continue to recover and support disaster preparedness that protects public and private recovery investments.

⁷ Cook County [National Disaster Resilience Competition Phase 2 Application](#) 2015.

The County's estimated unmet infrastructure need is approximately \$226 million when combining impacts and assistance associated with the disaster events. This total incorporates the following:

- **Cook County Emergency Management and Regional Security (EMRS)** estimated damages associated with DR-4819, tabulated through outreach to municipalities following the 2024 disaster (EMRS launched a Disaster Response and Recovery Fund (DRRF) to support municipalities for the most recent disaster only; therefore, there are not damage assessments for previous disasters).
- **Metropolitan Water Reclamation District of Greater Chicago (MWRD)** approved infrastructure projects in response to flood hazard risk throughout the County, for which CDBG-DR can be used as leverage.
- **FEMA Hazard Mitigation Grant Program** grants awarded to municipalities and county-entities for hazard mitigation infrastructure and public facilities in response to disasters DR-4728 and DR-4749, for which CDBG-DR can be used as local match.

In addition to the quantitative assessment of infrastructure project needs, the County has gathered additional information to ascertain the relative priority of investments in infrastructure and public facilities. These include the following data sources:

- **Historic FEMA IA Applications** from major declared disasters occurring between 2007 and 2025
- **Cook County Disaster Impacts Survey to Community and Municipal Leadership** open to local leadership and stakeholders between May 22 and June 6, 2025, allowing leadership to provide standardized information on the impacts of the disasters and their remaining needs. As of August 7, 2025, 36 of 95 municipalities have submitted responses to the survey.

2.3.2 Cook County Emergency Management and Regional Security (EMRS) Disaster Response and Recovery Fund (DRRF) Damage Assessment

In the aftermath of the severe storms in July 2023 (FEMA DR-4728-IL), EMRS worked closely with impacted municipalities to request assessments of damage in their communities. The County received several assessments from local municipalities for uninsured public infrastructure damage. Suburban municipalities (23 municipalities) in Cook County assessed \$2.3 million in damages, and subsequently 17 municipalities applied for County support through the DRRF. The assessments are broken into FEMA PA eligible categories, and categories cover initial damage assessments and remediation efforts.

Table 29 highlights the breakdown of costs by infrastructure type from EMRS's analysis of DR-4728, totaling \$651,000 in damages, and \$163,000 in remaining need that communities will be required to supply for recovery from direct impact to public facilities.

Table 31: DR-4728 July 2024 Impacts to Public Facilities and Infrastructure in Cook County

Category	Cost	External Funding Source	Local Share
Category A – Debris Removal	-	-	-
Category B – Emergency Protective Measures	-	-	-
Category C – Roads and Bridges	\$344,493	\$258,370	\$86,123
Category D – Water Control Facilities	\$0	\$0	\$0
Category E – Public Buildings and Content	\$157,376	\$118,032	\$39,344
Category F – Public Utility Systems	\$59,442	\$44,581	\$14,860
Category G – Parks, Recreation, and Other Facilities	\$89,934	\$67,450	\$22,483
Total	\$651,245	\$488,434	\$162,811

Source: EMRS DRRF 2024

2.3.3 Metropolitan Water Reclamation District of Greater Chicago (MWRD) Regional Stormwater Management Development Plan

MWRD has a significant pipeline of storm water management projects identified in its 2024 Strategic Plan.⁸ These include regional flood control projects that were recommended in MWRD's Detailed Watershed Plans and that aim to address flood control and overbank flooding on regional waterways. The approved projects also include projects that will assist communities with more localized flooding issues.

The full set of projects approved by the MWRD Board is included in the *Strategy*. Many of these projects will require local matching funding to help them move forward to implementation. The total of potential funds needed is \$189,500,00.

Table 32: Critical Flood Infrastructure Project Needs Identified by MWRD

⁸ https://mwrdd.org/sites/default/files/2024-09/Strategic_Plan_2024.pdf

Category	Cost	External Funding Source	Local Share
Category A – Debris Removal	-	-	-
Category B – Emergency Protective Measures	-	-	-
Category C – Roads and Bridges	\$3,870,000	\$1,870,000	\$2,000,000
Category D – Water Control Facilities	\$524,656,857	\$339,156,857	\$185,500,000
Category E – Public Buildings and Content	-	-	-
Category F – Public Utility Systems	-	-	-
Category G – Parks, Recreation, and Other Facilities	-	-	-
Total	\$528,526,857	\$341,026,857	\$187,500,000

2.3.4 FEMA Hazard Mitigation Grant Program (HMGP) Needs per Subrecipient

The FEMA HMGP will be a critical part of the long-term recovery process in both rebuilding and protecting housing stock and vital infrastructure. The states allocate HMGP funds to local jurisdictions for infrastructure and public facilities projects that aim to reduce risk to future disasters. Recipients of the grants must provide a non-federal share as leverage for the grant, but CDBG-DR funds may be used as the non-Federal portion. The County was determined to have \$113 million in potential HMGP costs related to disasters 4749 and 4728 with a required non-Federal Cost Share of approximately \$37 million across the County. These HMGP grants have not been finalized and local jurisdictions that are ultimately awarded funds may have other resources to meet the local match requirements, therefore the following estimate is not final nor is it a commitment to award funding to HMGP grant recipients.

Table 33: HMGP Awards to Cook County

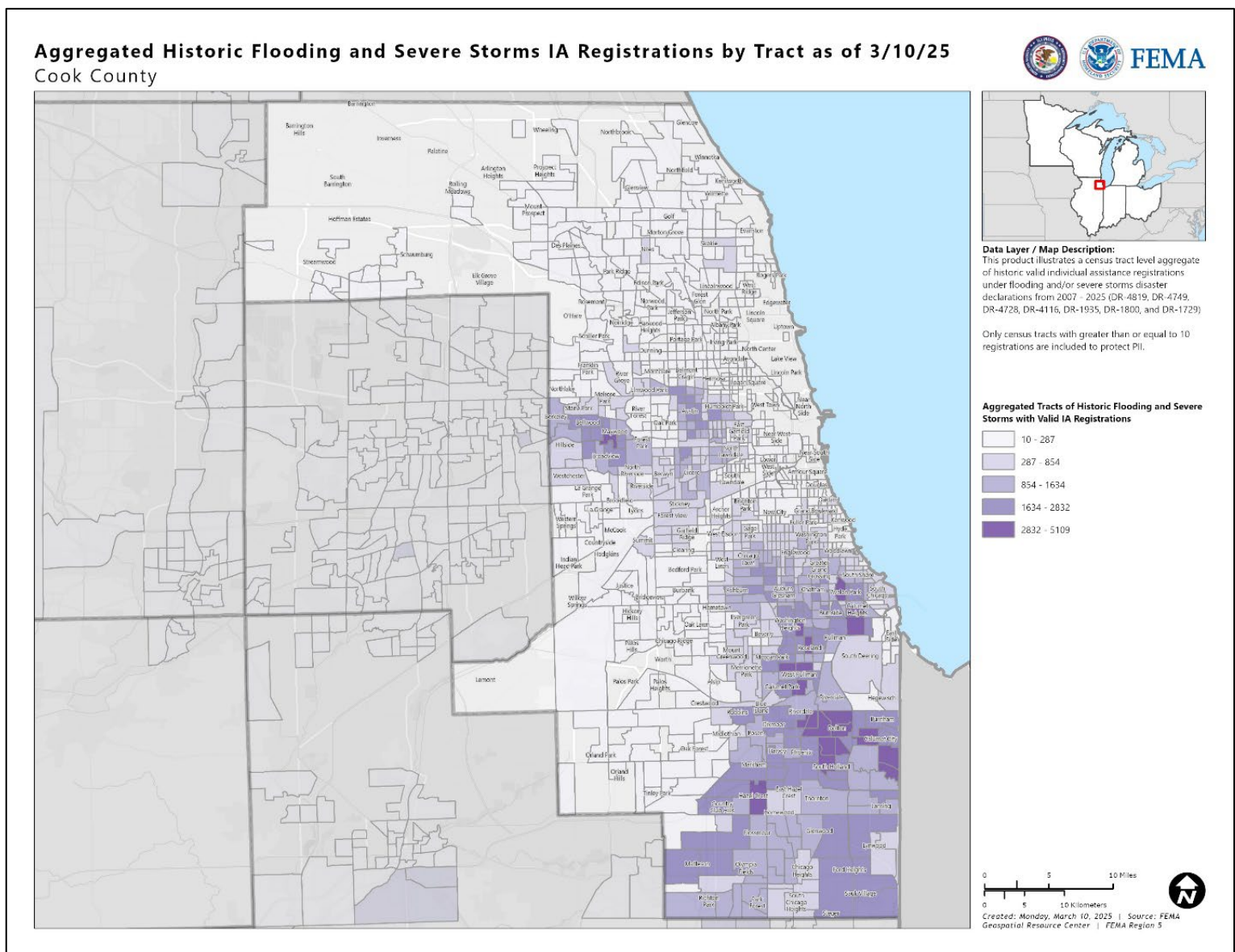
Total HMGP Project Cost	HMGP Funding	Estimated Cost Share Percentage	Unmet Need (Local Match)
\$113,330,241.66	\$76,281,410.85	75%	\$37,048,830.82

Source: FEMA HMGP data for Cook County DR-4728 and DR-4749

2.3.5 Historic FEMA IA Applications

As depicted in the map below, historic impacts to the County have been concentrated in specific neighborhoods throughout the County due to stormwater management infrastructure that lacks the capacity to handle the greater intensity and frequency of rainfall events that have been impacting the region. Building off of existing strategies, the County will identify high-impact areas for investment in infrastructure strategies to reduce flood risk. Additional analyses will include housing and business impacted by the disasters, as well as populations in need.

Figure 10: Historic FEMA IA Registrations by Census Tract, 2007-2025



Source: FEMA IA Applications 2007-2025

2.3.6 Cook County Disaster Impacts Survey to Community and Municipal Leadership

The County made significant effort to meet with and learn from impacted communities. These efforts included consulting with community leaders and representatives in meetings and sending out an electronic survey to nearly 100 community leaders and representatives inviting them to respond to the online survey and provide feedback on their communities' unmet disaster recovery needs. These efforts were undertaken to ensure community needs are reflected in the Action Plan and used to allocate CDBG-DR funds to the highest priorities and the communities with the greatest need. Additional summary of survey responses can be found in Appendix Section 7.2

Of the 95 municipalities represented by the individuals invited to respond to the survey, 36 completed it (37.9%) between May 22 and August 1, 2025. Of the respondents, over half (58.3%) stated there are remaining recovery needs in the community related to housing, infrastructure, or economic interests. Of those who thought there are remaining needs in their communities, 76.2% indicate that infrastructure, including sewage and storm water drainage, have remaining needs in the community.

Table 34: Remaining Unmet Needs

Please describe remaining needs.	Number	Percentages
Infrastructure (sewer, storm water, storm drainage)	16	76.19%
Other (public works, tree trimming, private property)	5	23.81%
Total Responses	21	100%

Source: Cook County Disaster Impacts Survey, May 22, 2025 – August 1, 2025

When asked to rank recovery priorities, infrastructure projects received the most "High priority" responses, with 26 of 56 "High priority" selections. Hazard mitigation followed, receiving 12 of 56 "High priority" selections.

Table 35: Priority Recovery Projects

Below is a list of projects that could help your community to recover from the disaster and mitigate future hazard risk. Please rank them based on which ones are high priority for your community on a scale of 1-3.	1= Low priority	2= Medium priority	3= High priority
Infrastructure – Transportation, Utilities, Social/Public Facilities, Mitigation infrastructure, Green/Nature-based Infrastructure	2	4	26
Housing – Multi-family/rental rehab/recon, Single-family rehab/recon, Affordable Rental Housing, Mobile/Manufactured housing	11	12	7
Business/Commercial – small business assistance	11	6	11
Mitigation/Hazard Risk Reduction	5	9	12
Total Responses	29	31	56

Source: Cook County Disaster Impacts Survey, May 22, 2025 – August 1, 2025

2.4 Economic Revitalization

The City does not anticipate there being an unmet need for economic revitalization. According to the SBA data, loans that were provided totaled a higher amount than the amount of the identified need. The County will work with residents in the event additional unmet need is identified, or the County identifies unreported damage which occurred to local businesses or to economic development projects. The impacts of the storms and flooding were primarily felt in residential areas, which has limited the damages to businesses and the local economy. An analysis of SBA verified business losses and disaster recovery loans shows there is no remaining needs resulting from the qualifying disasters. As a result, the County intends to pursue infrastructure upgrades to support the ageing systems which lead to severe inland flooding.

The Small Business Administration (SBA) Economic Injury Disaster Loan (EIDL) program is available to small businesses, small agricultural cooperatives, nurseries, and private non-profit organizations (PNPs) with financial losses directly related to a disaster. EIDLs are available for working capital needs caused by a disaster and are available even if the business or PNP did not suffer any physical damage. The loans may be used to pay fixed debts, payroll, accounts payable and other bills not paid due to a disaster. The SBA provides disaster loans to businesses to cover losses not covered by insurance or

funding from FEMA and business operating expenses that could have been met had a disaster not occurred.

Following the September 2023 severe storms and flooding and the Presidential declaration of a major disaster for the State of Illinois, SBA issued the disaster number IL-20010 to capture all loans for physical damage and economic injury (EIDL). This disaster declaration covers Cook County. In addition, following the Presidential declaration for the July 2024 severe storms, tornadoes, straight-line winds and flooding, SBA issued the disaster number IL-20007, also covering Cook County and capturing EIDLs.

The table below shows the dollar amount and count of SBA EIDLs by business type and size. Cook County does not anticipate funding activities for businesses or economic revitalization at this time. However, as the needs assessment continues and County staff meets with businesses, long-term economic recovery from flood impacts will be kept at the forefront of conversations.

Table 36: SBA Business Loans by Business Category

Business Code/Category	Business/EIDL Loans	Total Amount Disbursed	
Accommodation and Food Services	15	\$653,259.82	\$783,200.00
Administrative and Support and Waste Management and Remediation Services	24	\$313,647.08	\$554,100.00
Agriculture, Forestry, Fishing and Hunting	1	\$0	
Arts, Entertainment, and Recreation	13	\$1,585,202.18	\$586,800.00
Construction	24	\$1,259,217.04	\$2,407,100.00
Educational Services	8	\$330,710.65	\$194,700.00
Finance and Insurance	1	\$0	
Health Care and Social Assistance	30	\$1,260,412.82	\$1,986,200.00
Information	3	\$651,808.00	\$655,200.00
Manufacturing	8	\$481,830.38	\$349,900.00
Other Services (except Public Administration)	43	\$2,289,505.48	\$1,468,900.00
Professional, Scientific, and Technical Services	31	\$503,255.78	\$2,157,600.00
Public Administration	1	\$11,120.60	\$5,000.00
Real Estate and Rental and Leasing	323	\$10,637,768.29	\$25,903,007.00
Retail Trade	26	\$856,848.74	\$736,400.00
Transportation and Warehousing	23	\$1,104,572.80	\$381,600.00
Wholesale Trade	3	\$107,556.00	\$25,000.00
Grand Total	577	\$22,046,715.66	\$38,194,707.00

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

Table 37: SBA Business Disaster Loan Unmet Need

SBA Business Disaster Loan Unmet Need	
Current Total Verified Loss	\$22,046,715
Current Total Loan Amount	\$38,194,707
Unmet Need	\$0

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

Table 38: SBA Business Disaster Loans by No. of Employees

SBA Business Disaster Loans by Business Size (No. of Employees)		
	10 or Less Employees	10 or More Employees
No. of Businesses	557	22
Percent of Businesses	96%	4%

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

According to data shared with the County from the Small Business Administration, there were loans which were awarded to impacted residents. In addition to the impact on business owners, some Cook County residents experienced disruptions in employment. A total of 37 unemployment claims were submitted via the Disaster Unemployment Assistance Program in response to the three applicable disasters, with most of the claims resulting from the storms and flooding in July 2023 (DR-4728-IL). In total applicants received \$356,340 in compensation for disaster-driven loss of income. Most of the disaster-related impact on employment was short-term, with most applicants reporting losses for less than two weeks.

Table 39: Disaster Unemployment Assistance Claims

FEMA Declaration Number	Total Claims	Weeks of Unemployment Compensated	Total Compensation
4728 (July 2023)	21	50	\$143,556
4749 (September 2023)	6	0	\$132,296
4819 (September 2024)	10	23	\$80,488
Total	37	73	\$356,340

Source: Disaster Unemployment Assistance Program: [Data Downloads](#)



3

Mitigation Needs Assessment

3 Mitigation Needs Assessment

3.1 Overview

In accordance with HUD guidance, Cook County completed the following Mitigation Needs Assessment. Cook County and a coalition of 125 municipal planning partners prepared and updated the 2024 Cook County Multi-Jurisdictional Hazard Mitigation Plan (HMP)⁹ in order to identify the risks posed by hazards and find ways to reduce their impacts. The HMP seeks to reduce risk for those who live in, work in, and visit the County. This Mitigation Needs Assessment heavily relies on the recently updated HMP to inform and provide a substantive basis for mitigation activities proposed in this Action Plan, with a focus on addressing and analyzing all significant current and future hazard risks.

3.2 Current and Future Hazard Risks

The HMP considered the full range of natural hazards that could impact all incorporated and unincorporated areas of Cook County as well as the incorporated areas of cities that cross county boundaries (the planning area). The process incorporated review of state and local hazard planning documents, as well as information on the frequency, magnitude, and costs associated with hazards that have impacted or could impact the planning area. Anecdotal information regarding natural hazards and the perceived vulnerability of the planning area's assets to them was also used.

The vast majority of property damage from natural hazards from 1950 to 2023 was due to flooding. Loss of life and injuries, however, were mostly due to tornado, extreme heat, and extreme cold events.

Cook County has experienced 22 presidentially declared events since 1967. Of these, 8 were severe storms, 7 were flood events, 4 were snow, and there was one of each of the following: tornado, hurricane, and biological events. Review of the declared disaster events and loss-causing hazard events helps identify targets for risk reduction and ways to increase a community's capability to avoid large-scale events in the future.

Table 40: Summary of Extent of Natural Hazards

Hazard	Total Events 1950-2023	Total Property Damage	Total Crop Damage	Total Deaths (Direct)	Total Injuries (Direct)
Drought	19	\$0	\$0	0	0
Extreme Cold/Wind Chill	18	\$0	\$0	34	5
Extreme Heat	18	\$750,000	\$0	36	0
Flood: Riverine	168	\$7.2M	\$0	2	0
Flood: Urban	160	\$1.052B	\$0	1	0

⁹ <https://www.cookcountyemergencymanagement.org/sites/g/files/ywwepo281/files/document/file/2024-09/CC%20Countywide%20and%20Unincorporated%20Volume%202%20%20Cook%20County%20MJ-HMP%20Annex.pdf>

Flood: Coastal	2	\$0	\$0	0	0
Fog	0	\$0	\$0	0	0
Hail	577	\$18.839M	\$0	0	0
High Winds	68	\$1.303M	\$0	4	15
Ice Storm	3	\$0	\$0	0	0
Lightning	56	\$6.537M	\$0	3	18
Tornado	67	\$118.338M	\$0	39	771
Winter Storm	46	\$0	\$0	5	0
Total	1,202	\$1,204,967,000	\$0	124	809

2024 Cook County Multi-Jurisdictional Hazard Mitigation Plan

The HMP followed a risk assessment methodology that assigned value to the following:

- Probability of Occurrence
- Extent Factors
- Vulnerability Factors
- Impact Factors
- Consequence Score

The following table represents the overall risk scores for Cook County based on the methodology described above. Following a data-driven quantitative assessment, the planning team utilized subject matter knowledge and expertise and further refined the scores. FEMA National Risk Index Scores, as appropriate and applicable, were used to inform the analysis.

Table 41: Cook County Overall Risk Scores

	Probability	Consequence				Total Risk
Hazard Event	Probability Factor	Sum of Weighted Extent Factors	Sum of Weighted Vulnerability Factors	Sum of Weighted Impact Factors	Consequence Score	Total Risk Score (Probability x Consequence)
Flood (Urban/Flash Flood)	3	15	12	30	57	79
Severe Winter Weather: Blizzards	3	15	16	24	55	77
Severe Winter Weather: Snow	3	12	16	21	49	70
Severe Weather: High Winds	3	9	16	16	41	60
Flood (Riverine/Creek)	2	15	11	31	57	56
Severe Winter Weather: Ice Storms	2	15	16	25	56	55
Severe Weather: Extreme Heat	2	12	12	30	54	54
Tornado	2	15	6	30	51	51
Severe Winter Weather: Extreme Cold	2	12	12	20	44	45
Drought	2	12	12	18	42	43
Coastal/Shoreline Flooding	2	12	6	23	41	42
Earthquake	2	9	16	16	41	42
Severe Weather: Lightning	3	6	6	14	26	41
Severe Weather: Hail	2	9	11	16	36	38
Severe Weather: Fog	2	9	6	14	29	32
Wildfire	2	6	6	15	27	30
Dam and levee failure	1	15	6	27	48	27

Table 42: Hazard Risk Scores Legend

Probability Factor		Sum of Weighted Extent Factors		Sum of Weighted Vulnerability Factors		Sum of Weighted Impact Factors		Consequence Score		Total Risk Score	
1	Low (L)	0-6	Low (L)	0-6	Low (L)	0-12	Low (L)	0-25	Low (L)	0-24	Low (L)
2	Medium (M)	7-12	Medium (M)	7-12	Medium (M)	13-26	Medium (M)	26-50	Medium (M)	25-59	Medium (M)
3	High (H)	13-18	High (H)	13-18	High (H)	27-39	High (H)	51-75	High (H)	60-100	High (H)
<p><i>* The Legend – specifically the assignment of low, medium, and high—provides an additional means to <u>qualitatively</u> assess the probability factor, sum of weighted factors, and the total risk scores for each hazard.</i></p> <p><i>* The Consequence Score represents the sum of the Extent, Vulnerability, and Impact Factors.</i></p> <p><i>* The Total Risk Score is a measure of Probability and Consequence.</i></p>											

3.2.1 Flooding

Flooding can occur in a number of ways, and many instances are not independent of each other and can occur simultaneously during a flood event. The following tables show the frequency of flooding events in Cook County over time, as well as FEMA's Hazard Specific Risk Index for these events. Based on this chart, Cook County could reasonably expect 6 flooding events annually, and FEMA's Expected Annual Loss (EAL) due to these events is almost \$28 Million.

Table 43: Severe Summer Storms Frequency in Cook County

Hazard Type	Frequency	Average Events Per Year
Riverine Flooding	68 events between 1997 and 2024	2.43
Urban/Flash/Stormwater Flooding	97 events between 1996 and 2023	3.46
Coastal/Shoreline Flooding	2 events between 2013 and 2022	0.20

Table 44: FEMA Hazard Specific Risk Index for Cook County, Illinois

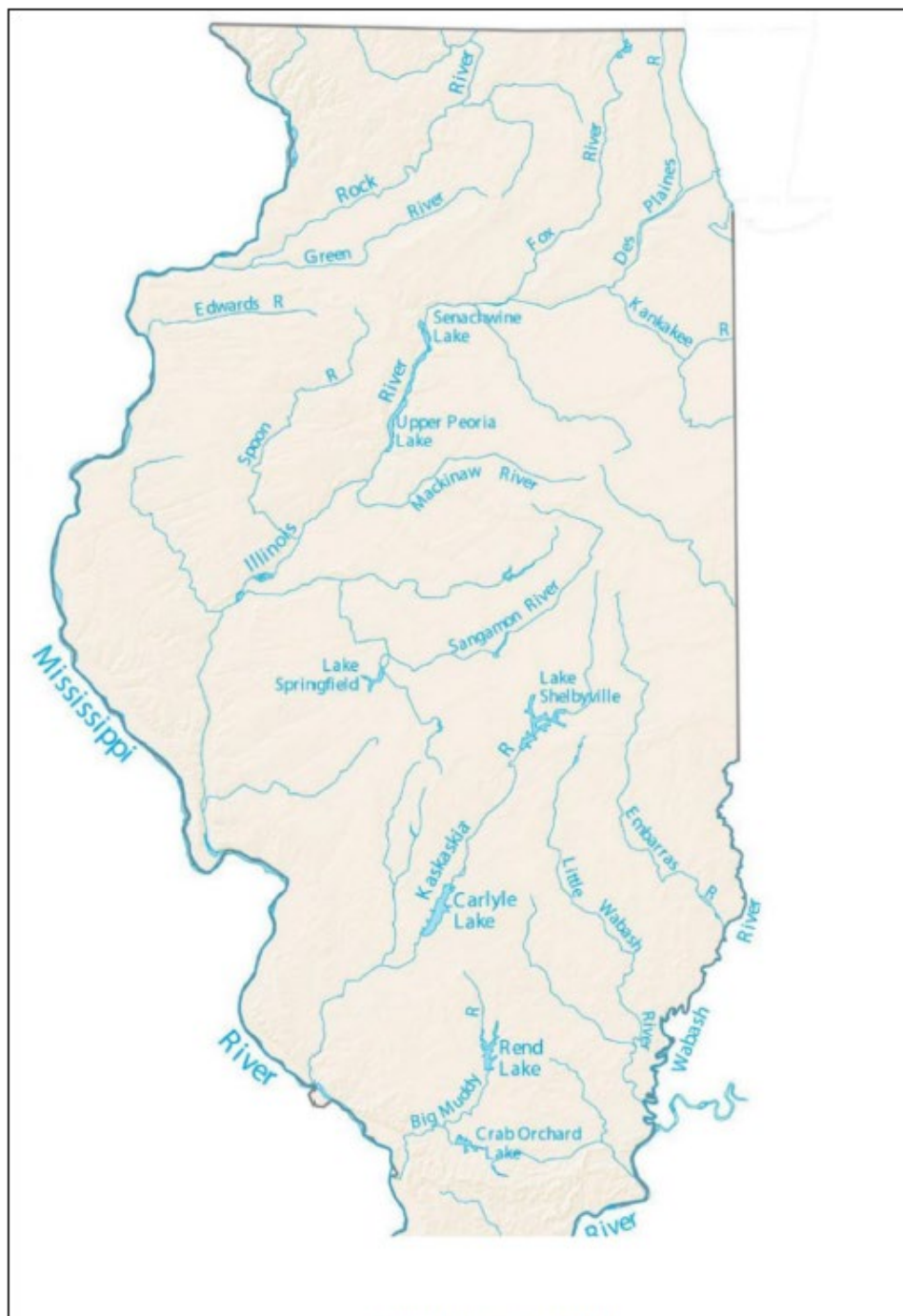
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – RIVERINE FLOODING				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$27,801,310	Very High	Relatively High	\$34,280,232	99.2
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – COASTAL FLOODING				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$46,076	Very High	Relatively High	\$59,601	44.3
<p><i>FEMA Hazard-Type Risk Index Scores are calculated using data for only a single hazard type and reflect a community's relative risk for only that hazard type.</i></p> <p><i>FEMA Hazard-Type Social Vulnerability Score represents the relative level of a community's social vulnerability compared to all other communities at the same level. A community's Social Vulnerability Score is proportional to a community's risk.</i></p> <p><i>FEMA Hazard-Type Community Resilience Score represents the relative level of a community's resilience compared to all other communities at the same level. The Community Resilience Score is inversely proportional to a community's risk.</i></p>				
Source: FEMA National Risk Index (2024)				

FEMA has mapped over 78 square miles of the 100-year floodplain and 99 square miles of 500-year floodplain along 172 water courses within the Cook County planning area. This includes floodplains

within jurisdictions that intersect multiple counties. While these maps do not cover all the flood risks within the planning area, they do represent a large percentage of the risk.

The image below illustrates the major rivers and lakes in Illinois.

Figure 11: Rivers and Lakes Map of Illinois (USGS)



Source: (2023 Illinois State HMP)

Figure 12: Lakes and Rivers in Cook County, IL



Source: By Kmusser - Own work, hydrography data from the National Hydrography Dataset, urban areas from the U.S. Census, all other data from the National Atlas., CC BY-SA 3.0, <https://commons.wikimedia.org/w/index.php?curid=27102351>

Floods in Cook County are caused by rainfall from large frontal storms, which may be in combination with some snowmelt, runoff, and ice jams. The principal contributor to flooding in the area is the

inadequate capacity of some of the natural stream channels to contain runoff resulting from intense thunderstorm precipitation over the stream basins. Inundation of lands adjoining stream channels has been aggravated over the years by the gradual accumulation of silt. The buildup of sand bars and island channels has resulted in the loss of channel capacity. Another factor lending itself to the poor flow characteristics of some portions of channels is the excessive growth of brush, light timber, and aquatic vegetation.

During the development of the Detailed Watershed Plans, information on existing problem areas was solicited from Watershed Planning Council members, municipalities, townships, federal and state agencies, and other stakeholders. Responses were used to help identify locations of concern and where field assessment, surveys, and modeling were needed to support alternative solutions. A review of these identified problems found a consistent set of flooding issues across the watersheds:

- Undersized or restrictive sewers or culverts
- Undersized ditches
- Undersized detention basins
- Poorly managed stormwater facilities
- Clogged sewers or culverts
- Overgrowth in drainage ditches
- Overgrowth at outfalls of storm sewers
- Overbank flooding
- Erosion
- Ponding or flooding in streets, alleys, parking lots, or yards
- Structural flooding from ponding or sheet flow
- No detention because the area was developed before detention requirements.
- Basement backups and sanitary backups
- Sump pumps connected to sanitary sewers
- Depressional areas with no overland drainage routes
- Lack of inlets in low-lying areas
- No storm sewers or ditches

3.2.2 Severe Weather

In this assessment, severe weather is considered to be extreme heat, lightning, hailstorms, dense fog, and strong wind. The following tables show the frequency of Severe Summer Storm events in Cook County over time, as well as FEMA's Hazard Specific Risk Index for these events. Based on this chart, Cook County could reasonably expect 7 severe weather events annually, and FEMA's Expected Annual Loss (EAL) due to these events exceeds \$171 million.

Table 45: Severe Summer Storms Frequency in Cook County

Hazard Type	Frequency	Average Events Per Year
Extreme Heat	15 events between 2007 and 2023	0.89
Lightning	47 events between 1996 and 2022	1.74
Hailstorms	216 events between 1955 and 2023	3.18
Dense Fog	0 events between 2014 and 2023	0.00
Strong Wind	49 events between 1996 and 2024	1.75

Table 46: FEMA Hazard Specific Risk Index for Cook County, Illinois

COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – EXTREME HEAT EVENTS				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$154,614,200	Very High	Relatively High	\$187,764,913	100.0
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – LIGHTNING EVENTS				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$2,969,805	Very High	Relatively High	\$3,600,856	99.1
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – HAILSTORM EVENTS				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$1,544,015	Very High	Relatively High	\$1,824,094	93.9
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – STRONG WIND EVENTS				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$12,397,536	Very High	Relatively High	\$14,964,947	99.7
FEMA Hazard-Type <u>Risk Index Scores</u> are calculated using data for only a single hazard type and reflect a community's relative risk for only that hazard type.				

FEMA Hazard-Type **Social Vulnerability Score** represents the relative level of a community's social vulnerability compared to all other communities at the same level. A community's Social Vulnerability Score is proportional to a community's risk.

FEMA Hazard-Type **Community Resilience Score** represents the relative level of a community's resilience compared to all other communities at the same level. The Community Resilience Score is inversely proportional to a community's risk.

Source: FEMA [National Risk Index](#) (2024)

3.2.3 Severe Winter Storms

In this assessment, severe winter storms are considered heavy snow, blizzards, ice storms, and extreme cold/wind chill. Severe winter storms could occur anywhere within Cook County, Illinois. The following tables show the frequency of severe winter storm events in Cook County over time, as well as FEMA's Hazard Specific Risk Index for these events. Based on this chart, Cook County could reasonably expect a severe winter storm annually, and FEMA's Expected Annual Loss (EAL) due to these events exceeds \$70 million.

Table 47: Severe Winter Weather Frequency in Cook County

Hazard Type	Frequency	Average Events Per Year
Heavy Snow	24 events between 1997 and 2023	0.92
Blizzard	4 events between 2000 and 2023	0.17
Ice Storm	3 events between 2007 and 2023	0.19
Extreme Cold/Wind Chill	17 events between 2006 and 2024	0.94

Table 48: FEMA Hazard Specific Risk Index for Cook County, Illinois

COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – WINTER WEATHER EVENTS				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$2,502,799	Very High	Relatively High	\$3,036,624	99.7
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – ICE STORM EVENTS				
EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$596,381	Very High	Relatively High	\$701,955	90.9
COOK COUNTY, ILLINOIS				
FEMA HAZARD SPECIFIC RISK INDEX – COLD WAVE EVENTS				



EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$68,048,044	Very High	Relatively High	\$82,635,463	100
<p>FEMA Hazard-Type Risk Index Scores are calculated using data for only a single hazard type and reflect a community's relative risk for only that hazard type.</p> <p>FEMA Hazard-Type Social Vulnerability Score represents the relative level of a community's social vulnerability compared to all other communities at the same level. A community's Social Vulnerability Score is proportional to a community's risk.</p> <p>FEMA Hazard-Type Community Resilience Score represents the relative level of a community's resilience compared to all other communities at the same level. The Community Resilience Score is inversely proportional to a community's risk.</p> <p>Source: FEMA National Risk Index (2024)</p>				

3.2.4 Tornado

Between 1954 and 2024, Cook County experienced 52 tornado events. This equates to an average of 0.74 tornado events/year. FEMA's Expected Annual Loss (EAL) due to tornado events exceeds \$304 million.

Although tornadoes strike at random, making all buildings vulnerable, three types of structures are more likely to suffer damage:

- Manufactured homes
- Homes on crawlspaces (more susceptible to lift)
- Buildings with large spans, including airplane hangars, gymnasiums, and factories

Cook County has approximately 15,889 manufactured homes that could be impacted by a tornadic event, making those residents more vulnerable than people in permanent homes¹⁰

Table 49: FEMA Hazard Specific Risk Index, Tornadic Events, Cook County, Illinois

EAL Value	Social Vulnerability Score	Community Resilience Score	Risk Value	Risk Index Score
\$304,067,865	Very High	Relatively High	\$364,927,286	100
<p>FEMA Hazard-Type Risk Index Scores are calculated using data for only a single hazard type and reflect a community's relative risk for only that hazard type.</p> <p>FEMA Hazard-Type Social Vulnerability Score represents the relative level of a community's social vulnerability compared to all other communities at the same level. A community's Social Vulnerability Score is proportional to a community's risk.</p> <p>FEMA Hazard-Type Community Resilience Score represents the relative level of a community's resilience compared to all other communities at the same level. The Community Resilience Score is inversely proportional to a community's risk.</p> <p>Source: FEMA National Risk Index (2024)</p>				

¹⁰ <https://nar.headwaterseconomics.org/17031/explore/map>

3.2.5 Drought

Drought is an expected phase in the climatic cycle of almost any geographical region and is certainly the case in Illinois. According to the National Drought Mitigation Center, drought “originates from a deficiency of precipitation over an extended period of time, usually a season or more. This deficiency results in a water shortage for some activity, group, or environmental sector.” What is clear is that a condition perceived as “drought” in a given location results from a significant decrease in water supply relative to what is “normal” in that area.

Cook County has not historically been severely affected by drought compared to other locations in the United States. The Illinois Hazard Mitigation Plan estimated that the annual probability of drought in Cook County is 14% with an estimated \$0 annual loss in property or crop damage (Illinois HMP 2018). This estimation demonstrates a higher future probability based on historical records of 9 drought events occurring in the county from 1951 to 2017 and a climatic shift that would increase evaporation rates.

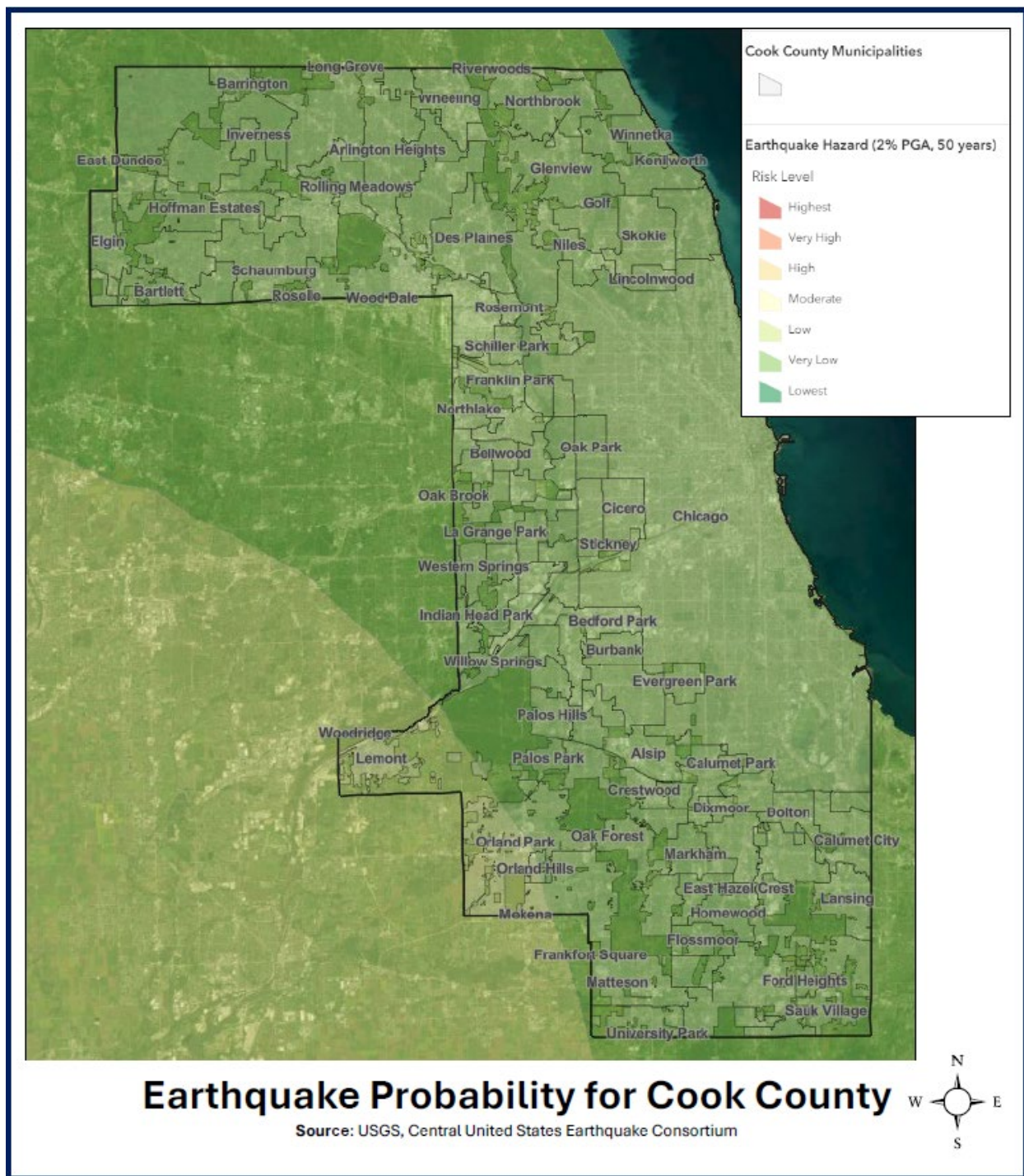
3.2.6 Earthquake

According to USGS, no fault zones are in Cook County; however, numerous reports highlight the fault activity of the Des Plaines Crater located beneath the populated Des Plaines suburb of Chicago.

A probabilistic seismic hazard map shows the hazard from earthquakes that geologists and seismologists agree could occur. The maps are expressed in terms of probability of exceeding a certain ground motion. The image below illustrates peak ground accelerations having a 2% probability of being exceeded in 50 years, for a firm rock site, which is used by the Central US Earthquake Consortium, and includes Illinois.

In the 2023 Illinois State HMP, data from Illinois State Geological Survey provided the number of earthquakes between 1795 and 2022, that were of a magnitude that could be felt or cause possible damage. During this time there were six earthquakes in Cook County. This averages a frequency of 0.026 events per year during this time.

Figure 13: Earthquake Probability Based on Peak Ground Acceleration for Cook County



3.2.7 Wildfire

Between 2004 and 2024, Cook County experienced 1 wildfire event according to the National Centers for Environmental Information. This equates to an average of 0.05 wildfire events/year.

Data from [FEMA's National Risk Index](#) indicates that there is a 0.010% chance per year annualized frequency of wildfire. The natural hazard annualized frequency is defined as the expected frequency or probability of a hazard occurrence per year. Annualized frequency is derived either from the number of recorded hazard occurrences each year over a given period or the modeled probability of a hazard occurrence each year.

3.2.8 Dams / Levee Failure

A dam is a barrier constructed across a watercourse for storage, control, or diversion of water. Dams typically are constructed of earth, rock, concrete, or mine tailings. A levee is a man-made structure, typically an earthen embankment, designed and constructed according to sound engineering practices to contain, control, or divert the flow of water in order to provide protection from temporary flooding. Levees are often built alongside rivers and are used to prevent high water levels from flooding adjacent land. The primary function of a levee is to provide flood risk reduction; however, they may also serve other purposes such as water conservation, irrigation, or supporting a roadway or railway.

The main causes of dam failure are the following:

- Overtopping caused by water spilling over the top of a dam. Overtopping of a dam is often a precursor of dam failure.
- Foundation defects, including settlement and slope instability.
- Cracking caused by movements like the natural settling of a dam.
- Inadequate maintenance and upkeep.
- Piping, which is when seepage through a dam is not properly filtered, and soil particles continue to progress and form sink holes in the dam. Seepage often occurs around hydraulic structures, such as pipes and spillways; through animal burrows; around roots of woody vegetation; and through cracks in dams, dam appurtenances, and dam foundations.

The main causes of levee failure are the following:

- Breach is the most severe form of failure; a breach occurs when a levee fails completely, resulting in an opening that allows water to flow through uncontrolled. This can lead to significant flooding and damage to areas that the levee was intended to protect.
- Overtopping occurs when water levels rise above the height of the levee, leading to spillover on the protected side. While technically an overtopping may not be a structural failure of the levee itself, it represents a failure to contain the water as designed.
- Structural damage includes any form of damage that compromises the integrity of the levee, such as erosion, seepage, or structural weakening. These issues may not immediately lead to a breach or overtopping but indicate that the levee is at risk of failing.

Figure 14: Cook County High Hazard Dams and Vulnerable Populations

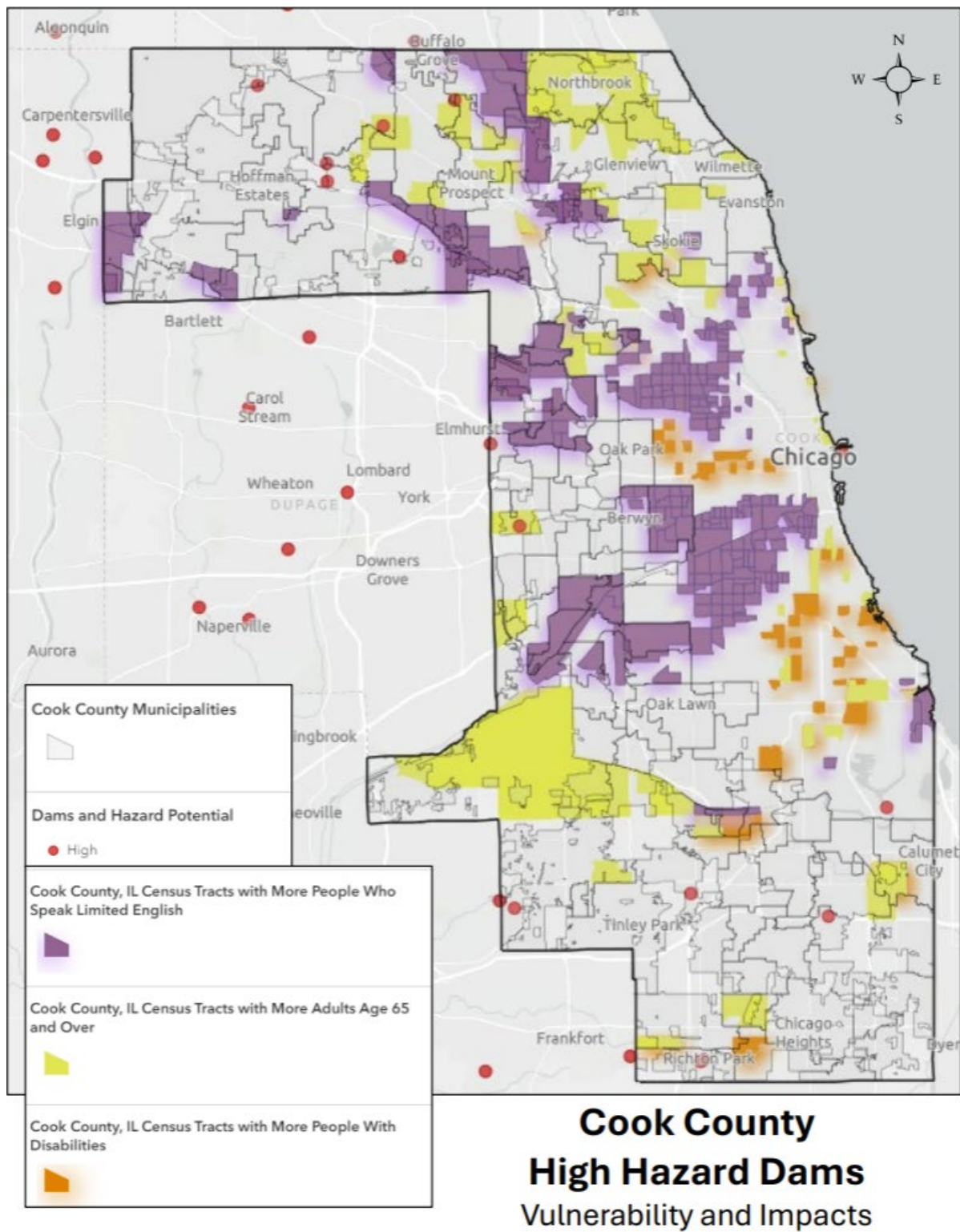
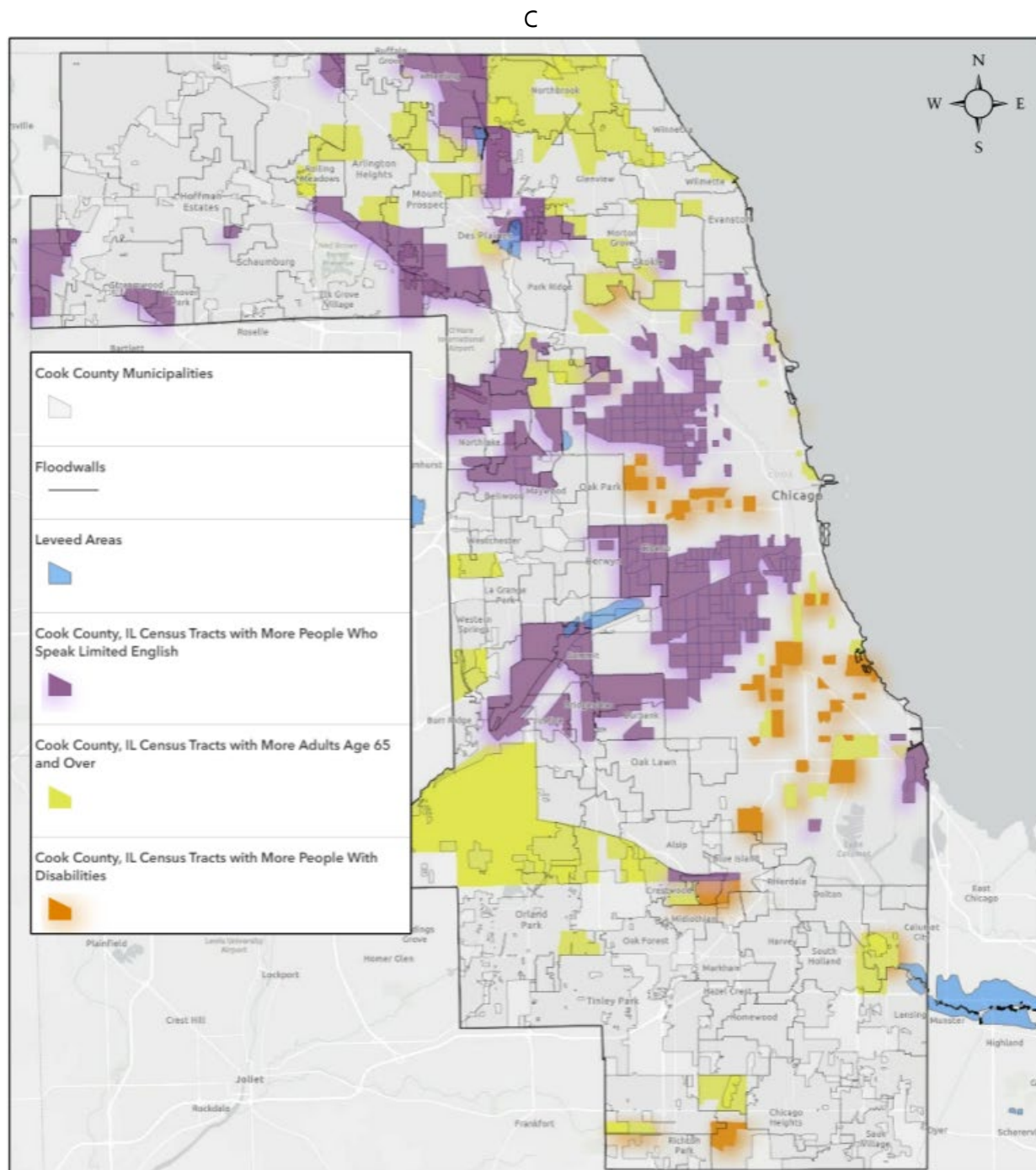


Figure 15: Cook County Levees and Vulnerable Populations



Cook County Levees Vulnerability and Impacts

Source: National Inventory of Levees, US Census Bureau, Chicago GreenPrint

Source: National Inventory of Dams

Climate change and the frequency of severe weather events can exacerbate the risks associated with dam and levee failures. This includes heavier rainfall and more intense storms, which lead to greater pressure on these structures. The heightened risk of overtopping or structural failure can result in more severe flooding and increased damage, necessitating improvements in resilience and mitigation planning for affected communities in Cook County. The dams and levees in Illinois are on average 57 to 72 years old and many of these structures were built using less rigorous engineering standards that may not stand up to extreme precipitation and faster streamflow. According to FEMA, the public health and life safety impacts of dam or levee failure can be significant and wide-ranging. Primary concerns are related to flooding and include contamination of water supplies, loss of life, displacement of populations, and sanitation and hygiene issues.

3.3 Mission, Goals, and Objectives Defined in the HMP

3.3.1 Mission

The mission in putting together the Cook County HMP was to identify risks and sustainable cost-effective actions to mitigate the impact of natural hazards in order to protect the life, health, safety, welfare, and economy of the communities of Cook County.

3.3.2 Goals

The following are the mitigation goals for the HMP:

1. Develop and implement sustainable, cost-effective, and environmentally sound risk-reduction (mitigation) projects.
2. Protect the lives, health, safety, and property of the citizens of Cook County from the impacts of natural hazards.
3. Protect public services and critical facilities, including infrastructure, from loss of use during natural hazard events and potential damage from such events.
4. Involve stakeholders to enhance the local capacity to mitigate, prepare for, and respond to the impacts of natural hazards.
5. Develop, promote, and integrate mitigation action plans.
6. Promote public understanding of and support for hazard mitigation.

The effectiveness of a mitigation strategy is assessed by determining how well these goals are achieved.

3.3.3 Objectives

Each selected objective meets multiple goals, serving as a stand-alone measurement of the effectiveness of a mitigation action, rather than as a subset of a goal. The objectives also are used to help establish priorities. The objectives are as follows:

1. Eliminate or minimize disruption of local government operations caused by natural hazards through all phases of emergency management.
2. Increase the resilience of (or protect and maintain) infrastructure and critical facilities.
3. Consider the impacts of natural hazards on future land uses in the planning area, including possible impacts from climate change.
4. Integrate hazard mitigation policies into land use plans in the planning area.
5. Develop, improve, and protect systems that provide early warnings, emergency response communications, and evacuation procedures.
6. Use the best available data, science and technologies to educate the public and to improve understanding of the location and potential impacts of natural hazards, the vulnerability of building types and community development patterns, and the measures needed to protect life and safety.
7. Retrofit, purchase, or relocate structures in high-hazard areas, including those known to be repetitively damaged.
8. Establish partnerships among all levels of local government, the private sector, and/or nongovernmental organizations to improve and implement methods to protect people, including underserved and underrepresented groups, and property.
9. Provide or improve flood protection on a watershed basis with flood control structures and drainage maintenance plans.
10. Strengthen codes and land use planning and their enforcement so that new construction or redevelopment can avoid or withstand the impacts of natural hazards.
11. Encourage mitigation through incentive-based programs like the Community Rating System and StormReady programs.
12. Reduce natural hazard-related risks and vulnerability to potentially isolated and underserved populations within the planning area and ensure mitigation strategies result in equitable outcomes.
13. Encourage hazard mitigation measures that have the least adverse effect on the natural environment and use natural processes.



Table 50: CDBG-DR Mitigation Set-Aside Needs Assessment

Categories Affected	Total Need (A)	Financial Assistance Budgeted and Obligated (B)	Unmet Need (A - B)
Housing	\$372,619,830	\$418,931,732	\$19,257,179
Infrastructure	\$642,508,344	\$417,796,702	\$224,711,642
Economic Development	\$22,046,715	\$38,194,707	\$0
Total	\$1,037,174,889	\$874,923,141	\$243,968,821

All programs funded through this CDBG-DR grant incorporate activities that mitigate flood risk, therefore the County will meet its mitigation set-aside minimum through its recovery programs and is not allocating CDBG-DR funds to a stand-alone mitigation program.



4

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

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

4.1 CDBG-DR Program Allocation and Funding Thresholds

Table 51: Unmet Needs and Proposed Allocations

Eligible Cost Category	Unmet Need	% of Unmet Need	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Rental Housing	\$19,257,179	7.9%	\$48,832,400	20.0%
Owner-Occupied Housing	\$0	0.0%	\$24,416,200	10.0%
Infrastructure	\$224,711,642	92.1%	\$151,380,440	62.0%
Economic Revitalization	\$0	0.0%	0	0.0%
Public Service (15% cap)	\$0	0.0%	0	0.0%
Planning (15% cap)	N/A	N/A	\$7,324,860	3.0%
Administration	N/A	N/A	\$12,208,100	5.0%
Total	\$243,968,821	100.0%	\$244,162,000	100.0%

The analysis of disaster impact and unmet needs data illustrates a history of persistent inland flood risk throughout the County, concentrated in dense urban areas of vulnerable populations, particularly in the southern part of the county. The County was impacted by three distinct major disasters that have resulted in a vast majority of homes receiving minor or moderate flood damage, but those households have subsequently been able to recover with other sources of funding. Still, at the aggregate level and over time, repeated events such as these have and will continue to detract from community and household opportunities for growth and prosperity.

The disasters impacted broad regions with moderate inland flooding of basements and lower levels of houses; however, impacts were concentrated in specific townships, where up to half of the total

housing stock experienced some damage. Together, these townships represent the vast majority of all homes damaged by the disasters. The repeated nature of flood impacts on these communities point to inadequate private and public stormwater infrastructure as the primary driver of damage to housing, business and the community and the greatest impediment to ongoing recovery.

Therefore, to prepare for increasing frequency and intensity of precipitation, and protect private and public investments in housing and communities, the County will use its CDBG-DR funds for recovery and mitigation activities, hardening owner-occupied housing, developing low-risk affordable rental housing, and investing in flood management facilities in strategic concentrated areas in order to optimize resiliency outcomes. Even though federal (FEMA and SBA) data do not indicate a high need for repairs to owner-occupied homes, the County has learned through outreach and consultations with community leadership that there is ongoing need to mitigate flood risk to individual homes, and will allocate funds to a home improvement program to address this. All funded programs will incorporate features that meet HUD's definition of mitigation, protecting people and property by reducing the impact of future disasters, which will ensure Cook County is both responding to the qualifying disasters and preparing households and communities for future hazards.



5

Grantee Proposed Use of Funds

5 Grantee Proposed Use of Funds

5.1 Overview

Table 52: CDBG-DR Program Allocation and Funding Thresholds

@#Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % Expended in HUD and Grantee MID Areas	Estimated % to LMI
Administration	\$12,208,100	5%			
Planning	\$7,324,860	3%	100%		
Housing	\$73,248,600	30%	100%	100%	90%
Infrastructure	\$151,380,440	62%	100%	100%	73%
Economic Revitalization	\$0	0%	0%	0%	0%
Public Service	\$0	0%	0%	0%	0%
Exempt Public Service	\$0	0%	0%	0%	0%
CDBG-DR Mitigation Set-Aside*	\$0	0%	0%	100%	0%
Total	\$244,162,000	100%	100%	100%	79%
% of Total	100%	100%	100%	100%	79%

*All programs incorporate activities that mitigate flood risk; therefore the County will meet its mitigation set-aside minimum through its recovery programs, and is not allocating CDBG-DR funds to a stand-alone mitigation program.

5.2 Allocation, Award Caps, and Program Descriptions

5.2.1 General Exception Criteria

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

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

5.2.2 Administration

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

Table 53: Grantee Administration Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$12,208,100	5%
Total	\$244,162,000	100%

5.2.3 Planning

Table 54: Grantee Planning Activity(ies) Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Strategic Flood Mitigation Plan	\$4,883,240	2%
Community Flood Resilience Planning	\$2,441,620	1%
Planning Total:	\$7,324,860	3%

Total	\$244,162,000	100%
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5.2.3.1 Strategic Flood Mitigation Plan

Amount of CDBG-DR Funds Allocated to this Program: \$4,883,240

Eligible Activity(ies):

- HCDA Section 105 (a)(12) – Activities necessary to develop a comprehensive community development plan
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754)

National Objective: Not applicable

Lead Agency and Distribution Model: The program will be administered by Cook County Department of Planning and Development in partnership with Cook County Department of Environmental Sustainability (DES), Emergency Management and Regional Security (EMRS), and the Metropolitan Water Reclamation District of Greater Chicago (MWRD).

DPD will administer the program and carry out activities such as developing the Request for Proposals, review and selection of applications, and procurement of the selected contractor(s). DPD will monitor the planning projects to meet HUD requirements, including program objectives, eligible activities, procurement regulations, and compliance and other federal requirements.

Program Description: The County is allocating funds to a planning effort that will inform strategic mitigation investments across the County. DPD, EMRS, DES, MWRD, and BAM will coordinate with local jurisdictions and regional partners to identify a scope of work that will inform targeted allocations of CDBG-DR funds in flood mitigation, particularly Affordable Housing Construction and Redevelopment, Home Rehabilitation and Resilience, and Community Infrastructure programs, and any related affordable housing. Planning completed for the Unmet Needs Assessment portion of the CDBG-DR Action Plan will be an eligible use of funds under this program. The goal is to develop a strategic plan for concentrating investments in communities with the highest need in order to optimize outcomes achieved.

The scope(s) of work will include efforts to build from existing County-wide plans (such as those developed by CMAP, MWRD, and Transforming Communities) to identify and prioritize high-needs neighborhoods, particularly with regard to low-income populations most impacted by disaster; communities at risk of repeated flood impacts; and the potential for cost-effective investment in flood mitigation through new affordable housing construction, private home rehabilitation, and public infrastructure. To do this, the County will procure a planning and/or landscape architecture firm or a team of firms to create a plan that compiles and builds off of existing risk assessment, community development plans that have already been developed. The firm or team will assess flood hazard risk of the watershed that includes the County and identifies highest-impact investments for other CDBG-DR program areas. The work will include data collection and analysis and extensive outreach to partners

and stakeholders throughout the county to learn more about the risks and strategic mitigation needs of communities. The analyses generated through this plan will directly guide criteria and funding decisions of housing and infrastructure programs.

Eligible Geographic Areas: Planning products will focus on geographies and jurisdictions within suburban Cook County.

Maximum Amount of Assistance Per Beneficiary: The County plans to allocate a maximum of \$4,883,240 for this work.

Maximum Income of Beneficiary: Not applicable

Mitigation Measures: This planning activity will incorporate an analysis of current and future risks to communities throughout the County, information needed to build capacity to contend with shocks and stressors by supporting risk modeling, enhancing stormwater modeling capacity, and exploring options for aligning other CDBG-DR investments in housing development, rehabilitation, and infrastructure.

The strategy will enable the County and local jurisdictions to align funding allocations in order to optimize resilience outcomes. It will also enhance the value and integrity of the social, ecological, and economic resources in the region, improve public access and recreational opportunities, and reach underserved and socially vulnerable populations directly impacted by disaster events.

Criteria for Funding: The County, in partnership with planning entities, will procure a firm or team competitively that can achieve the desired scope of work.

Reducing Impediments for Assistance: Cook County will work to reduce impediments for protected classes and vulnerable populations by working with partners and communities to ensure analyses and risk assessments take into consideration socioeconomic as well as natural hazard vulnerabilities.

5.2.3.2 Community Flood Resilience Planning

Amount of CDBG-DR Funds Allocated to this Program: \$2,441,620

Eligible Activity(ies):

- HCDA Section 105 (a)(12) – Activities necessary to develop a comprehensive community development plan
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754)

National Objective: Not applicable

Lead Agency and Distribution Model: The program will be administered by Cook County Department of Planning and Development in coordination with other County departments.

Beginning in 2023 the County has administered the Climate Resiliency Plan Program¹¹ funded through the American Rescue Plan Act (ARPA), and will model this program after that to carry out activities such as developing the Request for Proposals for the Planning Consultant, review and selection of applications, and procurement of the selected contractor(s). DPD will establish subrecipient selection criteria based on need and review and select municipalities to participate in the program. DPD will monitor the planning projects to meet HUD requirements, including program objectives, eligible activities, procurement regulations, and compliance and other federal requirements.

Program Description: The County will model this program after an existing local climate resiliency planning program initially funded through ARPA that provided funding for five Cook County municipalities in developing Climate Resiliency Plans. Through this program, Cook County hopes to help selected high-needs communities prepare for extreme hazard events to prevent damage and losses, while maintaining the well-being and health of residents. Through a community-driven planning and prioritization process, Cook County and the Climate Planning Consultant will work with communities to set goals, conduct hazard risk assessments, and identify a strategic approach to infrastructure investments to bolster resiliency. Planning consultants will use community input to develop individualized and detailed Climate Resiliency Plans that inform local investments in housing and infrastructure.

Eligible Geographic Areas: Planning products will focus on geographies within suburban Cook County based on application from eligible municipalities.

Maximum Amount of Assistance Per Beneficiary: The Program will provide up to \$500,000 in funds per municipality as eligible and available.

Maximum Income of Beneficiary: Not applicable.

Mitigation Measures: The plans that result from this program will incorporate an analysis of current and future risks to select communities throughout the County—information needed to build capacity to contend with shocks and stressors by supporting risk modeling; enhancing stormwater modeling capacity; and exploring options for aligning other CDBG-DR investments in housing development, rehabilitation, and infrastructure.

The strategy will enable the County and local jurisdictions to align funding allocations in order to optimize resilience outcomes. It will also enhance the value and integrity of the social, ecological, and economic resources in the region; improve public access and recreational opportunities; and reach underserved and socially vulnerable populations directly impacted by disaster events.

Criteria for Funding: The County will select five high-need municipalities impacted by the recent disasters. Preference will be given to communities with concentrations of low- or moderate-income households impacted by one of the qualifying disasters. To be selected, communities must:

- Apply for the program by submitting a complete application by the program deadline.
- Be a municipality (city, village or town) located in suburban Cook County.

¹¹ <https://www.cookcountyil.gov/climateresiliency>

- Not have an existing Climate Resiliency Plan, Adaptation Plan, Climate Action Plan or similar Plan, updated within the past six years.
- Demonstrate a need for technical assistance due to insufficient funding, staff capacity or other necessary resources.
- Commit to working with the County and designated consultant to host community feedback sessions, respond to information requests, and actively participate in the Climate Resilience Planning process.

Reducing Impediment for Assistance: Cook County will work to reduce impediments for protected classes and vulnerable populations by conducting targeted outreach on this program to those communities with the greatest needs and that are populated by vulnerable populations and protected classes; providing technical assistance through the duration of the outreach and application period; and working closely with each municipality selected for the program to address the unique climate resilience needs of its most vulnerable populations and protected classes.

5.2.4 Housing

Table 55: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Residential Flood Rehabilitation and Resilience Program	\$24,416,200	10%
Multi-Family Affordable Rental New Construction Program	\$48,832,400	20%
Housing Program Total:	\$73,248,600	30%
Total	\$244,162,000	100%

5.2.4.1 Residential Flood Rehabilitation and Resilience Program

Amount of CDBG-DR Funds Allocated to this Program: \$24,416,200

Eligible Activity(ies):

- HCDA Section 105 (a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing

- HCDA Section 105 (a)(5) – Removal of Architectural Barriers
- HCDA Section 105 (a)(11) – Relocation Payments
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754)

National Objective:

- Low- to Moderate-Income Benefit
- Urgent Need

Lead Agency and Distribution Model: Cook County will serve as the lead agency and will collaborate with local jurisdictions and community partners to assess unmet needs. The program will be administered by one or more subrecipients. Subrecipients will be responsible for application intake, eligibility screening, physical inspections and assessments, scope of work development, budgeting, scheduling, and construction oversight. Homeowners will choose contractors and work with subrecipient administrators in implementation of work that is within parameters of the program. They will also ensure compliance with duplication of benefits (DOB), cost reasonableness, and chargeback requirements in accordance with CDBG-DR regulations. Cook County will oversee program performance, data reporting, and adherence to all applicable federal and local guidelines.

Lead Agency for Environmental Reviews: Cook County DPD will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

Program Description: The program will provide forgivable loans to eligible homeowners to address unresolved damage from flooding resulting from the qualifying disasters and to implement resilience improvements of owner-occupied residences. These improvements may include:

- **Mitigation measures** to reduce the risk of basement flooding from combined sewer overflows. These gray measures may include disconnection of downspouts, use of overhead sewers or backflow preventers, and other interventions to minimize backups.
- **Prevention measures** such as green infrastructure and landscaping elements designed to capture stormwater runoff before it enters the sewer system. These green measures may include rain barrels, rain gardens, cisterns, and other green alternatives to address surface flooding.

To support broader neighborhood recovery and encourage private investment in resilience, the program is structured as both a recovery and behavioral incentive. By helping homeowners take action, the County aims to inspire neighboring property owners to invest in similar improvements, creating a ripple effect that enhances flood preparedness community-wide.

Eligible properties must be located within flood-impacted areas of suburban Cook County, including those in designated floodplains and LMI neighborhoods. Cook County will conduct targeted outreach to identify eligible homeowners and assess their rehabilitation and mitigation needs.

Assistance will be provided in the form of small, forgivable loans to eligible homeowners. Households with damage exceeding program caps or in need of more extensive repair may be referred to other local housing rehabilitation providers or funding sources, including those outside of CDBG-DR, to ensure continuity of support for severely impacted properties.

Detailed program guidelines will define eligibility criteria, allowable and unallowable costs, per-unit funding caps, and evaluation criteria for project proposals. These guidelines will also incorporate mitigation and resilience standards aligned with State and Federal standards.

Eligible Geographic Areas: Jurisdictions within suburban Cook County.

Other Eligibility Criteria: This program will prioritize low- or moderate-income owner-occupied resident households (making less than 80% of the Area Median Income of Cook County) that are located in communities targeted for flood hazard risk reduction through the Community Flood Infrastructure Improvement Program and Strategic Flood Mitigation Plan.

Maximum Amount of Assistance Per Beneficiary: Each project will be capped at \$10,000.

Maximum Income of Beneficiary: 70% of awards will be directed to low- or moderate-income households making less than 80% of the AMI for Cook County. Households that do not meet this income threshold will be categorized under the Urgent Need National Objective.

Mitigation Measures: All rehabilitation activities will incorporate mitigation strategies to enhance the resilience of assisted properties. Cook County will follow its Written Housing Standards for Owner-Occupied Single-Family and Multi-Family Residential Rehabilitation and New Construction. These standards will be referenced in all CDBG-DR agreements and will ensure compliance with applicable local building codes or, where absent, the BOCA Code for the State of Illinois. Energy-efficient building practices and components will be integrated into all rehabilitation work.

Reducing Impediments for Assistance: Cook County will proactively identify and reduce impediments to program access for protected classes, vulnerable populations, and historically underserved communities. This includes culturally competent outreach, language access services, and partnerships with trusted community-based organizations to ensure inclusive participation.

5.2.4.2 Multi-Family Affordable Rental New Construction Program

Amount of CDBG-DR Funds Allocated to this Program: \$48,832,400

Eligible Activity(ies):

- HCDA Section 105(a)(1) – Acquisition
- HCDA Section 105 (a)(3) – Code Enforcement
- HCDA Section 105 (a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing



- HCDA Section 105 (a)(5) – Removal of Architectural Barriers
- HCDA Section 105 (a)(7) – Disposition
- HCDA Section 105 (a)(8) – Public Services
- HCDA Section 105 (a)(11) – Relocation Payments
- HCDA Section 105 (a)(13) – Administrative Costs
- HCDA Section 105 (a)(14) – Assistance to Non-Profit Entities
- HCDA Section 105(a)(15) – Assistance to Neighborhood-Based Organizations
- HCDA Section 105 (a)(20) – Housing Services
- HCDA Section 105 (a)(26) – Lead-Based Paint Hazard Evaluation and Reduction
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754).

National Objective:

- Low- to Moderate-Income Benefit

Lead Agency and Distribution Model: Cook County will serve as the lead agency for the Multi-Family Affordable Rental New Housing Program. Work will be carried out by one or more subrecipients, including but not limited to Illinois Housing Development Authority (IHDA), non-profit or for-profit developers (primarily Community Housing Development Organizations (CHDOs)) and contractors, under the oversight of the County.

Lead Agency for Environmental Reviews: Cook County DPD will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

Program Description: The Multi-Family Affordable Rental New Construction Program will fund the development of new, resilient affordable rental units in Cook County. The 2023 and 2024 flooding underscored the vulnerability of the County's rental housing stock. As illustrated in the unmet needs assessment, nearly 7,000 rental units experienced major losses as a result of the disasters. Many of these units have experienced repeat or persistent flooding issues.

To meet this unmet need and reduce future risk, Cook County will support the construction of approximately 250 new units of flood-resilient, affordable rental housing in eligible flood-impacted areas. Projects must incorporate resilient construction methods, be located out of high-risk flood zones, and comply with local and federal building and accessibility standards.

- Units developed under this program will be subject to affordability requirements and will primarily serve low- to moderate-income households.

Eligible Geographic Areas: Eligible locations include jurisdictions within suburban Cook County.

Other Eligibility Criteria: Eligible subrecipients will include private developers, public or non-profit organizations, and CHDOs/ (Community-Based Development Organizations (CBDOs)).

- Projects must be located in flood-impacted Cook County jurisdictions.
- A minimum of 51% of units must go to LMI households.
- A portion of units must be set aside for seniors or special needs populations.
- Developments must demonstrate financial feasibility and include resilient design elements.
- Preference will be given to projects that:
 - a. Incorporate enhanced flood mitigation;
 - b. Include accessible units and on-site supportive services;
 - c. Are wired for broadband
- Priority for tenancy will be given to households directly impacted by the disaster, with a focus on seniors and special needs populations who were displaced or remain at risk due to the lack of accessible, resilient housing. A tenant selection plan will be developed as part of the program design process and communicated to the public in the policy guidelines.

Maximum Amount of Assistance Per Beneficiary: Maximum award amount per project is \$10 million. Cook County will set a per-unit assistance limit within its policies and procedures for the program to ensure cost reasonableness of all projects.

Maximum Income of Beneficiary: Units will be restricted to households making no more than 80% of AMI to qualify as providing LMI benefit.

Mitigation Measures: All new construction will be required to integrate mitigation measures into project scope. Mitigation activities funded for replacement housing will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. This will increase the supply of disaster-resistant housing for all income groups, including individuals with disabilities and seniors.

Reducing Impediments for Assistance: Cook County is committed to ensuring access to disaster recovery assistance for all disaster-impacted individuals. The County will establish requirements for the number of accessible units and deeply affordable units based on project size. To the greatest extent possible, application processes will be streamlined to reduce complexity. Targeted outreach campaigns will be conducted in coordination with trusted local organizations in disaster-impacted communities to ensure special needs populations, populations with disabilities, seniors, and others receive information and updates on the program.

5.2.5 Infrastructure

Table 56: Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
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FEMA HMGP Non-Federal Match	\$36,624,300	15%
Community Flood Infrastructure Improvement Projects	\$97,664,800	40%
Infrastructure in Support of New Housing	\$17,091,340	7%
Infrastructure Program Total:	\$151,380,440	62%
Total	\$244,162,000	100%

5.2.5.1 FEMA HMGP Non-Federal Match

Amount of CDBG-DR Funds Allocated to this Program: \$36,624,300

Eligible Activity(ies):

- HCDA Section 105(a)(1) – Acquisition
- HCDA Section 105 (a)(2) – Acquisition, construction, reconstruction, or installation of public works, facilities and site or other improvements
- HCDA Section 105 (a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing
- HCDA Section 105 (a)(g) – Payment of the non-Federal share required in connection with a Federal grant
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754).

National Objective:

- Low to moderate income area (LMA)
- Urgent Need (UN)

Lead Agency and Distribution Model: The program will be administered by Cook County Department of Planning and Development in coordination with Emergency Management and Regional Security (EMRS), which will be a subrecipient of DPD. Under the direction of DPD, EMRS will administer the program and carry out activities such as reviewing projects for eligibility and determining project portion/eligible expenses for match. EMRS will also monitor projects to meet HUD requirements, including ties to the disaster, eligible activities, national objectives, procurement regulations, and compliance and other federal requirements like labor standards.

DPD and EMRS will coordinate with local jurisdictions and regional partners to identify and prioritize eligible FEMA HMGP Match infrastructure projects. Project selection will be conducted directly by the County based on established criteria, including program compliance, community need, and cost-effectiveness of project.

Lead Agency for Environmental Reviews: Cook County DPD will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

Program Description: The overarching goal of the program is to support local jurisdictions with infrastructure activities related to recovery. FEMA requires the state and local governments to pay a share of the cost of a project funded through HMGP, called the local share or match. In the aftermath of a disaster, these match requirements can be burdensome on jurisdictions that have been overwhelmed by emergency and recovery work and further weakened by lost government revenues. CDBG-DR grant funds may be used as the non-federal match required, and the County intends to use up to the \$37 million potential HMGP local match needed to support the projects in order to help alleviate the burden on impacted communities.

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

- Local governments;
- County agencies and authorities;
- Other local recipients of HMGP grants, as applicable.

Eligible Geographic Areas: Jurisdictions within suburban Cook County.

Maximum Amount of Assistance Per Beneficiary: The maximum award for the Infrastructure Match Program will be determined by the project cost. The County can support each project up to the non-federal match requirement of 25% of project cost. Cost overruns can also be covered by CDBG-DR match funding.

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

Mitigation Measures: All infrastructure will be designed to increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

Other Eligibility Criteria: The County will select projects for funding based on established criteria, including program compliance, community need, and cost-effectiveness of project. LMI areas that meet HUD's guidelines for benefiting a community with majority of LMI households will be prioritized for funding. The portion of funds applied as match for any project must meet CDBG-DR eligibility requirements in addition to the requirements of the federal and state agency administering the project.

Reducing Impediments for Assistance: Cook County will work to reduce impediments for protected classes and vulnerable populations by working with communities where such populations reside and that are eligible for HMGP match funding. The County will evaluate if a match has already been achieved or is needed across all eligible communities.

5.2.5.2 *Community Flood Infrastructure Improvement Projects*

Amount of CDBG-DR Funds Allocated to this Program: \$97,664,800

Eligible Activity(ies):

- HCDA Section 105(a)(1) – Acquisition
- HCDA Section 105 (a)(2) – Acquisition, construction, reconstruction, or installation of public works, facilities and site or other improvements
- HCDA Section 105 (a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing
- HCDA Section 105 (a)(g) – Payment of the non-Federal share required in connection with a Federal grant
- HCDA Section 105 (a)(14) – Provision of loans and grants for activities carried out by public or private nonprofit entities, including acquisition of real property, construction, reconstruction, rehabilitation, or installation of public facilities, site improvements, utilities, and commercial or industrial buildings, and planning.
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754).

National Objective:

- Low- and moderate-income area benefit (LMA)
- Urgent Need

Lead Agency and Distribution Model: . The County will issue a Notice of Funding Availability (NOFA) to solicit proposals from municipalities and qualified regional partners with experience implementing large scale infrastructure projects. Project selection will be conducted by the County based on transparent criteria including but not limited to unmet disaster recovery and mitigation needs, project cost-effectiveness, and community susceptibility to flood and other hazard risks.

Lead Agency for Environmental Reviews: Cook County DPD will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

Program Description: This program provides grant funding for public infrastructure improvements that address disaster impacts, increase resilience to future flood events, and reduce the risk of disaster-related damage. Projects will focus on long-term recovery in communities that experienced severe flooding due to the qualifying disaster and will help prevent similar impacts in the future.

Cook County will prioritize infrastructure investments that fill funding gaps in otherwise viable mitigation projects, especially those already identified by entities such as the Metropolitan Water Reclamation District (MWRD), the Illinois Emergency Management Agency (IEMA), the U.S. Army Corps of Engineers (USACE), and municipalities within suburban Cook County. These funds may directly support high-impact projects not addressed through other funding streams.

Cook County will encourage project designs that:

- Combine **gray and green infrastructure** to maximize effectiveness
- Use **nature-based solutions** where feasible, such as vegetated swales, bioretention basins, or permeable surfaces
- **Respect and leverage community assets**, like existing tree canopies or cultural landmarks
- Reflect principles of **climate adaptation** and sustainable recovery
- Are aligned with the Strategic Flood Mitigation Plan and identify projects that optimize other CDBG-DR funded projects and programs

Projects located near transit, employment hubs, or priority redevelopment zones may receive additional consideration due to their potential for long-term co-benefits.

Given the scale of need, the County has made a substantial initial allocation to this program, with the potential for future amendments to increase support as the needs assessment and project review processes evolve.

Eligible Geographic Areas: Jurisdictions within suburban Cook County.

Other Eligibility Criteria: The County will select projects for funding based on established criteria, including program compliance, community need, and cost-effectiveness of project. 70% of all activities will be directed to low- or moderate-income areas. The County will prioritize high-needs neighborhoods identified through the Strategic Flood Mitigation Plan, particularly with regard to low-income populations most impacted by disaster, communities at risk of repeated flood impacts, and the potential for cost-effective investment in flood mitigation public facilities and infrastructure.

Maximum Amount of Assistance Per Beneficiary: The maximum award is capped at \$10,000,000.

Maximum Income of Beneficiary: Not applicable for area-wide or urgent need infrastructure projects.

Mitigation Measures: All funded projects must demonstrate how they will mitigate, eliminate, or reduce the risk of loss of life or property due to current and future natural hazards. Applications must include a plan for long-term operation and maintenance beyond the life of the CDBG-DR grant. Projects should reflect sound, sustainable recovery principles and consider local hazard risks, land use constraints, and the needs of underserved communities.

Reducing Impediments for Assistance: Cook County will work to reduce impediments for protected classes and vulnerable populations. This includes engaging community-based organizations in outreach and planning, and ensuring transparency in project selection.

5.2.5.3 Infrastructure in Support of New Housing

Amount of CDBG-DR Funds Allocated to this Program: \$19,532,960

Eligible Activity(ies):

- HCDA Section 105(a)(1) – Acquisition
- HCDA Section 105 (a)(2) – Acquisition, construction, reconstruction, or installation of public works, facilities and site or other improvements
- HCDA Section 105 (a)(4) – Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing
- Applicable waivers identified in the Allocation Announcement Notice (90 FR 4754) and Universal Notice (90 FR 1754).

National Objective:

- Low- and moderate-income area benefit (LMA)

Lead Agency and Distribution Model: Cook County will serve as the lead agency. Work will be carried out either directly by Cook County or by subrecipients, including but not limited to Illinois Housing Development Authority (IHDA), non-profit or for-profit developers (primarily CHDOs) and contractors, under the oversight of the County.

Lead Agency for Environmental Reviews: Cook County DPD will handle all environmental responsibilities per 24 CFR 58.4(b)(2) and 24 CFR 58.18 when a subrecipient is a unit of local government.

Program Description: Flooding from the declared disasters significantly impacted the supply and condition of affordable housing throughout Cook County. Rebuilding efforts will require investment not only in housing but in the neighborhood infrastructure necessary to support long-term residential recovery. This program provides funding for infrastructure development and improvements directly tied to the development of new CDBG-DR funded housing. Eligible projects may include streets, sidewalks, utility connections, stormwater management, and other critical infrastructure located within residential areas targeted for new housing.

Infrastructure funding is available to support developers working on affordable housing projects, ensuring that new housing is built in neighborhoods with the public infrastructure necessary for safe, resilient, and sustainable occupancy. All infrastructure investments will incorporate mitigation features to reduce risks from future disasters.

This program addresses unmet needs by ensuring that CDBG-DR-supported housing developments in Cook County's MID areas are viable and supported by essential infrastructure. Developers may request

additional infrastructure funding as part of their housing project applications to address emerging needs during project implementation. The County anticipates supporting approximately 4 infrastructure projects through this program.

Once the Action Plan is approved, Cook County will finalize and publish program policies for its Multi-Family Rental New Construction Housing Program, which will govern the coordination and eligibility for infrastructure support under this program.

Eligible Geographic Areas: Jurisdictions within suburban Cook County.

Other Eligibility Criteria: Projects approved for assistance must be part of projects funded through the Multi-Family Affordable Rental New Construction Program. Priority will be given to projects that improve livability and resilience in areas most affected by the disaster. Please refer to those program sections for full eligibility and evaluation criteria.

Maximum Amount of Assistance Per Beneficiary: Maximum award for each project is \$5,000,000.

Maximum Income of Beneficiary: This is not a direct benefit program and therefore there is no maximum income identified. However, the service area must be composed of at least 51% low to-moderate-income (LMI) residents, defined as 80% of AMI or below. No additional income limits apply to the program.

Mitigation Measures: All infrastructure projects must be designed to reduce the long-term risk of loss of life, injury, property damage, and hardship by incorporating mitigation strategies aligned with the County's Mitigation Needs Assessment. Infrastructure funded through the Mitigation Set-Aside must address clearly identified disaster mitigation needs, such as flood risk reduction.

Reducing Impediments for Assistance: Cook County will prioritize infrastructure projects that are essential to enabling disaster-impacted housing developments to proceed.



6

General Requirements

6 General Requirements

6.1.1 Citizen Participation

Cook County adhered to the County of Cook, Illinois Citizen Participation Plan,¹² which meets the federal CPP requirements. Affected residents were notified of opportunities to participate in the creation of this plan in multiple ways, and public participation was facilitated through an online survey, in-person and virtual meetings and consultations, public hearings, and a public comment period.

6.1.2 Consultation of Developing the Action Plan

Cook County conducted several types of consultations to gather community input in the disaster-affected areas prior to the publication of the draft action plan. The goal was to understand the continuing unmet needs from the disasters in 2023 and 2024.

Cook County Disaster Impacts Survey to Community and Municipal Leadership: Cook County conducted an online survey sent directly to leadership and representatives of affected municipalities and councils of government. The survey asked questions to assess the damage communities experience, the challenges of receiving assistance after the storm, and the current needs of those communities that still require assistance. The online survey was shared with the subregional council of government representing 95 municipalities, and directly with 71 leaders of many of those municipalities.

The survey results show that among the municipalities that responded with remaining unmet needs, over 70% ranked infrastructure as their highest-priority need. Many described the effects the eligible disaster events had on their sewer systems. The full list of questions and responses can be found in Section 7.2: Cook County Disaster Impacts Survey Responses.

Stakeholder Meetings: Cook County conducted ongoing meetings and discussions with interested non-profit organizations, city and county governments, and other entities in the disaster-affected area. The meetings often included a brief presentation of the Action Planning process followed by an opportunity for participants to discuss ongoing unmet needs.

Emails and Phone Calls: Cook County contacted multiple non-profit organizations, city and county governments, and other entities in the disaster-affected area and in areas that historically flood. The outreach included a brief presentation of the Action Planning process followed by an opportunity for participants to discuss ongoing unmet needs. These consultations are summarized in the table below.

Table 57: Consultations

¹² County of Cook, Illinois, Citizen Participation Plan <https://www.cookcountyil.gov/citizen-participation-public-notice>

Partners Consulted	Summary of Consultation
Cook County Local Leadership Via Survey	36 responses received from the survey sent to municipal leadership throughout suburban Cook County
Federal Partners (HUD, FEMA, SBA)	Cook County reached out to federal partners to discuss ongoing needs, including SBA, HUD, and FEMA, for data and guidance on necessary to complete the unmet needs assessment and allocate funds to effective recovery and mitigation program.
South Suburban Council and Government	Cook County reached out to South Suburban Council and Government to discuss ongoing needs and potential for coordination of programs.
Western Suburban Council and Government	Cook County reached out to Western Suburban Council and Government to discuss ongoing needs and potential for coordination of programs.
Indian Tribes	Cook County sent a survey and flyer of the Action Plan to the following communities: Citizen Potawatomi Nation, Oklahoma, Forest County Potawatomi Community, Wisconsin, Hannahville Indian Community, Michigan, Kickapoo Tribe of Oklahoma, Little Traverse Bay Bands of Odawa Indians, Michigan, Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan, Menominee Indian Tribe of Wisconsin, Miami Tribe of Oklahoma, Prairie Band Potawatomi Nation to solicit information about community needs.
Alliance for Great Lakes	Cook County reached out to Alliance for Great Lakes to discuss ongoing needs and potential for coordination of programs.
Chicago Metropolitan Agency for Planning (CMAP)	Cook County reached out to Chicago Metropolitan Agency for Planning (CMAP) to discuss the unmet needs assessment, planning activities, and potential coordination of programs.
EMRS	Cook County reached out to DEMRS to discuss unmet needs information and coordination of programs.
Housing Authority of Cook County (HACC)	Cook County reached out to HACC to discuss ongoing and unmet needs information and coordination of programs.

Metropolitan Water Reclamation District of Greater Chicago	Cook County reached out to Metropolitan Water Reclamation District of Greater Chicago to discuss unmet needs information and coordination of programs.
Private sector	Cook County presented unmet needs and Action Plan during the monthly meeting of the Cook County Economic Development Advisory Committee, a public meeting that included business associations, stakeholders, and experts focused on Cook County economic improvements.
Alliance to End Homelessness	Cook County reached out to Alliance to End Homelessness and affiliated partners to discuss ongoing needs and coordination of programs.
Illinois Housing Development Authority	Cook County reached out to Illinois Housing Development Authority to discuss unmet needs information and coordination of programs.

Stakeholders noted a variety of disaster and hazard risk related needs throughout Cook County. Generally, feedback supported the overall approach of the Action Plan to allocate funds to risk reduction of both private and public properties where such funds would have the greatest impact on communities most in need.

6.1.3 Public Comments

Cook County published this CDBG-DR Action Plan on the County's **Disaster Recovery and Resilience - CDBG-DR webpage** for a 30-day public comment period, beginning June 28, 2025 and ending July 28, 2025.

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

Comments regarding the CDBG-DR Action Plan were accepted via email to Home.response@cookcountyil.gov. Comments were also accepted in person and virtually during two public hearings held during the public comment period.

A summary of citizen comments on this Action Plan, along with Cook County responses, is included in Appendix 7.1 Consideration of Public Comments in this document.

6.1.4 Public Hearings

Per the Federal Register's approach for CDBG-DR, at least two public hearings are required during the 30-day comment period to obtain citizens' views about the Action Plan. These public hearings were

hybrid, offering both the opportunity to participate in person at the sites listed below and virtually. Cook County will ensure that all citizens have equal access to information and will adhere to the Americans with Disabilities Act (ADA).

Cook County held two public hearings during the public comment period.

1. **July 15, 2025 (6:00 – 7:30 PM)** at Cal Comm Center, 12419 South Ashland Avenue, Calumet Park, IL 60827
2. **July 16, 2025 (8:30 – 10:00 AM)** at 69 W. Washington Street, Chicago, IL 60602.

Both of these hearings were hybrid: in-person and online to expand the reach of the hearings.

Virtual hearings were made accessible during the live hearing on Microsoft Teams. Updated information and recordings of the public hearings are available on the [Cook County Public Notice website](#).

The notification about the hearing was posted on the Cook County [Disaster Recovery and Resilience - CDBG-DR webpage](#), in the *Chicago Tribune*, social media, and emailed to the County's list of local governments, councils of governments, and local organizations. Along with the hearings, Cook County will provide key information on the Action Plan and the funded programs on its disaster recovery website.

6.1.5 Citizen Complaints

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

- Formal complaints are written statements of grievance, including email, comments posted on the Cook County website, and handwritten complaints. Cook County shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the Cook County website. Cook County shall maintain a tracker for collecting and categorizing complaints through resolution.
- Informal complaints are verbal complaints. Cook County and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process
- Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD Office of the Inspector General Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

Cook County will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on the [Cook County Disaster Recovery and Resilience - CDBG-DR webpage](#) to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

6.2 Modifications to the Action Plan

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

6.2.1 Substantial Amendment

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

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

When Cook County pursues the substantial amendment process, the amendment will be posted on the [Cook County Disaster Recovery and Resilience - CDBG-DR webpage](#) for a 30-day public comment period. The amendment will be posted in adherence with the Americans with Disabilities Act (ADA). Cook County will review and respond to all public comments received and submit the amendment to HUD for approval.

6.2.2 Non-substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. Cook County will notify HUD 5 business days before the change is effective. All amendments will be numbered sequentially and posted to the [Cook County Disaster Recovery and Resilience - CDBG-DR webpage](#) into one final, consolidated plan.

6.3 Performance Reports

Performance reports will be completed on a quarterly basis using the HUD Disaster Recovery Grant Reporting (DRGR) system. Data will be gathered for performance reports from subrecipients as well as internally at Cook County. The data will be compiled and entered per activity in DRGR. Financial and progress-based data will be collected. Cook County will make all performance reports available for public review and comment.



7

Appendix

7 Appendix

7.1 Consideration of Public Comments

Cook County received 25 public comments during the public comment period from June 28, 2025 through July 28, 2025. The below table summarizes the comments and Cook County's responses.

Table 58:

Comment Received	Cook County Response
<p>Citizen: Calumet city desperate needs help with flooding issues. Homes are getting destroyed and families are losing tons of money and valuables. We can't continue to live like this. People will rather sell than deal with the flooding, and the town will become a ghost town eventually. send any help.</p>	<p>Thank you for your response. Cook County has considered the needs of the community when developing the funding allocations for this grant, and agrees that funds should be directed to programs that address flood risk in the most impacted areas of Cook County. The Strategic Flood Mitigation Plan, Community Flood Resilience Planning, Residential Flood Rehabilitation and Resilience Program, and Community Flood Infrastructure Improvement Projects are programs described within this Action Plan that seek to address the impacts and underlying issues related to flooding. Once approved by HUD, we hope to launch programs in early 2026. You can find updates on the programs on the County's CDBG-DR website here: https://www.cookcountyil.gov/service/disaster-recovery-and-resilience</p>
<p>Cornerstone Community Development Corporation: Dear Ms. Cooke:</p> <p>I am reaching out to you on behalf of Cornerstone Community Development Corporation, the Village of Ford Heights, the Ford Heights/Chicago Heights Neighborhood Network, and the Higher Heights Initiative (HHI), which serves as the convener of the Resilience Hub Project in Ford Heights. For the past 18 months, we have been deeply engaged in this initiative to build a community-based Resilience Hub in one of the most economically depressed communities in Cook County, an effort which was to be funded through designated ARPA resources. We have now been informed that the ARPA funds allocated to this work have been redirected, placing the entire project on indefinite hold.</p> <p>This news comes as a heavy blow, not only to the project team, but more importantly, to a community</p>	<p>Thank you for your response. Cook County has considered the needs of the community when developing the funding allocations for this grant, and agrees that funds should be directed to programs that address flood risk in the most impacted areas of Cook County. This Action Plan describes programs that seek to address the impacts and underlying causes of flooding, including the Strategic Flood Mitigation Plan, Community Flood Resilience Planning, and Community Flood Infrastructure Improvement Projects which will provide opportunities for communities to engage in resilience planning and facilities improvements. Cook County will coordinate with local jurisdictions and regional partners to identify, evaluate, and prioritize infrastructure projects. Project selection will be conducted by the County based on transparent criteria. We plan to design and launch these programs in early 2026. At this time, we are not soliciting project proposals but will take into consideration community</p>

Comment Received	Cook County Response
<p>that has waited too long for the type of investment that fosters safety, connection, and self-sufficiency. Without intervention, a site intended to become a cornerstone of community resilience may instead remain vacant and blighted, a painful symbol of stalled progress.</p> <p>This work has not just been aspirational, it's been actionable. With hard-earned momentum and meaningful community engagement, we made tangible progress, including the identification and advancement of property that was to be transformed into a safe, resilient, and active resource for the residents of Ford Heights.</p> <p>Ford Heights cannot afford to wait. Recent events in neighboring communities have shown us how rapidly emergencies unfold, and how vital it is to prepare in advance. The absence of infrastructure, resources, and coordinated response mechanisms in a crisis is not just a gap, it's a risk.</p> <p>We have been encouraged to explore other potential pathways, including the County's consideration of providing CDBG-DR funding for this project. We are doing our part to keep this vision alive, but we also recognize that meaningful change requires partnership and leadership. Now is the time for clear, compassionate, and forward-thinking action. This is more than a request for support; it is a call to meet the moment with the urgency, equity, and courage it demands.</p> <p>We remain hopeful that with thoughtful leadership, this project can be revived and fulfilled—for Ford Heights and for what it represents: resilience in action for one of the most impoverished and underserved communities in Cook County.</p> <p>I have also attached a preliminary budget based on the hard work and assessments of the need to prepare Ford Heights to be optimally prepared for emergencies and disasters it may encounter.</p> <p>With appreciation for any consideration afforded this request.</p>	<p>resilience needs and funding gaps in the allocation of these funds. You can find updates on the programs on the County's CDBG-DR website here: https://www.cookcountyil.gov/service/disaster-recovery-and-resilience</p>
<p>Citizen: Please see attached my letter for comment for the CDBG-DR hearing. I am unfortunately unable to attend both of the public hearings. I don't imagine you will need to reach out to me, but in case you do, my cell is [redacted] and I can always be emailed at this address.</p> <p>I am writing to provide public comment on Cook County's Community Development Block Grant—</p>	<p>Thank you for your response. This Action Plan covers the uses of CDBG-DR funds that are tied to eligible disaster events from 2023 and 2024. While many of the proposed programs seek broad community improvement, the use of these funds must be disaster-related. Our programs seek to foster resiliency for the wider Cook County community while focusing on the areas most affected by the disasters. We will take into</p>



Comment Received	Cook County Response
<p>Disaster Recovery (CDBG-DR) funding. While I write today as a resident of Blue Island, IL, I also bring a professional perspective as a research scientist at the Illinois Criminal Justice Information Authority (ICJIA), where I work in the Center for Victim Studies. Our team conducts research on victimization in Illinois and evaluates programs that address the needs of crime victims. Prior to this role, I served as an epidemiologist focused on diseases of social inequity, such as HIV and COVID-19. This letter is written in a personal capacity, and I offer these insights both as a social scientist and a Cook County resident.</p> <p>My husband and I moved to Blue Island from New Orleans five years ago. We are both public health professionals and have experienced an improved quality of life since relocating. That said, we've observed ongoing disparities on the south side of Chicago and in its inner-ring suburbs—challenges that echo those we saw in New Orleans.</p> <p>I respectfully urge the County to prioritize the following areas:</p> <ul style="list-style-type: none"> • Road and Safety Infrastructure <p>Many of our streets, particularly in Blue Island, are in urgent need of improvements—especially regarding traffic safety and signage. Our community has numerous interconnected roads and train tracks, and drivers often cut through residential neighborhoods to avoid train delays, frequently at unsafe speeds. This is especially concerning in areas near parks and schools. In my own neighborhood, a side street that bypasses multiple railroad crossings sees high-speed traffic during peak train times. I have personally had several close calls while walking my dog. Installing speed bumps and improving traffic calming infrastructure could greatly reduce these risks and improve neighborhood safety.</p> <ul style="list-style-type: none"> • Blighted Housing <p>In my career, I've conducted extensive research on the connection between blighted housing and community harm. Abandoned or severely deteriorated homes are major contributors to violent crime, fire hazards, and public health issues. Blue Island has a number of these properties, many of which remain in limbo due to liens or unclear ownership. I encourage the County to develop a comprehensive plan to address blighted housing, including working with local fire departments to assess properties for condemnation and demolition.</p>	<p>consideration community recovery and resilience needs and funding gaps in the allocation of these funds. You can find updates on the programs on the County's CDBG-DR website here: https://www.cookcountyil.gov/service/disaster-recovery-and-resilience</p>



Comment Received	Cook County Response
<p>A lien should not obstruct action when a property poses a danger to public safety.</p> <ul style="list-style-type: none"> • Support for the City of Robbins <p>While Blue Island has urgent needs, I believe the City of Robbins requires even greater attention. Robbins faces a severe crisis of disinvestment: widespread blighted housing, high poverty rates, limited economic opportunity, and few essential services or amenities. The town continues to be overlooked and lacks the infrastructure needed to foster resilience or growth. Upon moving to the area, my husband, a New Orleans native, described Robbins as “a permanent 9th Ward post-Hurricane Katrina.” I include this quote to convey the severity of the conditions—not to be dramatic, but to highlight the scale of neglect and the need for intervention. No neighboring community, including Blue Island, will thrive if Robbins continues to fall further behind.</p> <p>These investments align with the goals of the CDBG program: to support low- and moderate-income residents and to strengthen the long-term resilience of communities. I also encourage you to consider incentivizing medical providers to establish practices in Blue Island, which currently qualifies as a medical-care desert. Our nearest hospitals—Ingalls and Christ—are located a significant distance away.</p> <p>Thank you for your time and your commitment to equitable community development.</p>	
<p>City of Berwyn: I work for the City of Berwyn overseeing our public infrastructure projects. We are considered an entitlement community and not able to apply for additional CDBG grants in the past. With this plan, will Berwyn be able to apply for addition funds to alleviate issues due to flooding?</p>	<p>Thank you for your response. As outlined in the Action Plan, Cook County will coordinate with local jurisdictions and regional partners to identify, evaluate, and prioritize infrastructure projects. Project selection will be conducted by the County based on transparent criteria including but not limited to unmet disaster and mitigation needs, project cost-effectiveness, and community susceptibility to flood and other hazard risks. The County will prioritize high-needs neighborhoods identified through the Strategic Flood Mitigation Plan, particularly with regard to low-income populations most impacted by disaster, communities at risk of repeated flood impacts, and the potential for cost-effective investment in flood mitigation public facilities and infrastructure. All of Cook County is deemed a Most Impacted and Distressed area by HUD, and therefore all Cook County jurisdictions (except city's with direct CDBG-DR grants Chicago and Cicero)</p>



Comment Received	Cook County Response
	and will be eligible for consideration of infrastructure funding.
<p>Cook County Bureau of Asset Management: Thank you for the opportunity to provide feedback on the Draft CDBG-DR Action Plan. First I want to personally thank you for the incredible work put forth by DPD Staff and Consultants in developing the Draft Action Plan. I know it wasn't easy to navigate administration transition and the evolving unknowns it presented, roll out thoughtful and authentic community and stakeholder engagement efforts, and conduct robust and incisive quantitative analysis all within an abbreviated and evolving timeline. Truly, the County is lucky to have such a devoted group of professionals carry this out. It absolutely shows in the final product, which is of the highest quality.</p> <p>The Bureau of Asset Management (BAM), through the Build Up Cook Program, shared a project proposal in early May for consideration: A Flood Risk Assessment of 18 severely under-resourced municipalities in Cook County. This Flood Risk Assessment proposal was drafted for consideration under the ill-fated BRIC program and is now under consideration by IEMA under the Hazard Mitigation Grant Program. It represents coordination with the Department of Emergency Management and Regional Security, the 18 municipalities identified therein, and other Cook County departments. The request to BED and consultants was to consider funding through CDBG-DR of that scope as well as design and construction of a handful of projects identified by the assessment.</p> <p>Upon reviewing the plan, I'm hoping and humbly requesting that BAM and Build Up Cook can be identified as a partner and ongoing implementer of the flood mitigation aspects of the Action Plan. I'm confident that our relationships with key staff and electeds at under-resourced municipalities will make us an asset to the effort, as well as our expertise and experience with engineering and construction of infrastructure and facilities. I know that there is significant pressure on DPD and consultants to move the planning process forward despite significant challenges. I'm humbly requesting the following specific inclusions/revisions in red.</p> <p>Page 67: Strategic Flood Mitigation Plan</p> <p>Lead Agency and Distribution Model: The program will be administered by Cook County Department of Planning and Development in partnership with Cook</p>	<p>Thank you for your contribution to the proposed Action Plan language. The County acknowledges the importance of strategic partnerships in carrying out the CDBG-DR grant and funded programs. As appropriate, BAM will be referenced as a partner to the County under applicable programs. Program-specific terms and conditions of any partnership with BAM will be negotiated and documented within an MOU.</p>



Comment Received	Cook County Response
<p>County Department of Environmental Sustainability (DES), Emergency Management and Regional Security (EMRS), Bureau of Asset Management (BAM) through Build Up Cook, and the Metropolitan Water Reclamation District of Greater Chicago (MWRD).</p> <p>Page 75: FEMA HMGP Non-Federal Match</p> <p>All entities that are eligible for FEMA HMGP may be eligible for the HMGP Match Program. These entities include, but are not limited to:</p> <p>Local governments</p> <p>County agencies and authorities, including the Bureau of Asset Management (BAM) through Build Up Cook;</p> <p>Other local recipients of HMGP grants, as applicable.</p> <p>Page 77: Community Flood Infrastructure Improvement Projects</p> <p>Cook County will prioritize infrastructure investments that fill funding gaps in otherwise viable mitigation projects, especially those already identified by entities such as the Bureau of Asset Management (BAM) through Build Up Cook, Metropolitan Water Reclamation District (MWRD), the Illinois Emergency Management Agency (IEMA), and the U.S. Army Corps of Engineers (USACE). These funds may directly support high-impact projects not addressed through other funding streams.</p>	
<p>211 Metro Chicago: Testimony: 211 Metro Chicago Disaster Response</p> <p>211 services across the United States have consistently demonstrated their critical role in disaster response, notably during Hurricanes Katrina and Sandy, the San Diego wildfires, and numerous local emergencies. In alignment with this national standard, 211 Metro Chicago was fully prepared with a comprehensive disaster response plan prior to its launch in January 2023. This response included robust telephony operations, a fully developed resource database, and a backup service infrastructure.</p> <p>From the outset, 211 Metro Chicago integrated Microsoft Power BI to monitor call trends and visualize community needs by zip code. This data-driven approach enabled swift identification of emerging issues and efficient allocation of resources.</p> <p>During the July and October 2023 Cook County flooding events, 211 Metro Chicago became the central contact point for residents seeking disaster-related assistance. The service connected more than 300 families with</p>	<p>Thank you for your response and background information about how the 2-1-1 service provides support to residents and communities in Cook County. The County acknowledges the support that 211 offers and the information it can provide the County and jurisdictions about real time disaster response and recovery needs. We look forward to ongoing partnership in the assessment of recovery needs and implementation of programs in the County.</p>



Comment Received	Cook County Response
<p>critical support, including referrals to the American Red Cross, FEMA, and a network of health and human services providers.</p> <p>By leveraging real-time data, 211 Metro Chicago provided daily and weekly reports to emergency operations leadership, highlighting affected areas and trends in service demand. Power BI visualizations further supported officials in prioritizing response efforts and updating regional resource databases.</p> <p>211 Metro Chicago's successful disaster response illustrates the essential role of coordinated, data-informed services in supporting communities during crisis, particularly in areas with low income and high need. As disasters affect our community, whether due to weather or other reasons, 211 Metro Chicago is equipped to handle the most challenging calls for help during times of greatest need. Through our partnerships with the City of Chicago and Cook County, as well as the referral network of thousands of programs, we are prepared to handle any local or regional event to help our community as a whole.</p>	
<p>Citizen: Dear Cook County Department of Planning and Development,</p> <p>I am writing as a long-time resident of Chicago's Northwest Side on behalf a disabled family member living on a fixed, limited income. I am respectfully requesting that your department consider allocating funds from the U.S. Department of Housing and Urban Development (HUD) to assist individuals such as these, who were severely impacted by the severe storms that struck our area between July 13 and July 16, 2024.</p> <p>The damage to their home from these storms has been substantial. Their roof, gutters, fence, and parts of the home's structure sustained serious damage, and unfortunately, the costs of repairs are far beyond what they can afford. I know that they applied for assistance through FEMA, but were not approved for Individual Assistance. Additionally, their insurance company has denied full coverage for the necessary repairs, leaving them with limited options and increasing financial stress. Theirs is not the only such case I have heard of.</p> <p>While I have tried to aid this family member myself, the physical and emotional burden of trying to recover from this disaster without adequate support has been overwhelming for them. I am doing my best to maintain a safe and livable home for them, but without financial</p>	<p>Thank you for your response. Both Cook County and the City of Chicago received individual CDBG-DR allocations from HUD. Cook County's CDBG-DR programming (and its related Action Plan) are focused on suburban Cook County. The County will not be allocating funds or operating programs within the City of Chicago. As a Chicago resident, we recommend you consult with the City of Chicago directly regarding planned programs and assistance options.</p>



Comment Received	Cook County Response
<p>assistance, they are at risk of further deterioration of the property and living conditions.</p> <p>I understand that HUD funding may be made available to support disaster recovery efforts in Cook County, and I respectfully urge you to prioritize residents who have fallen through the cracks of other aid programs like FEMA and the Home Repair Program, which is no longer accepting applicants for this disaster. Directing these funds to support homeowners facing critical repair needs due to storm damage would be a lifeline for many vulnerable residents who are otherwise left behind.</p> <p>I appreciate your time and consideration of this urgent request.</p>	
<p>Village of Oak Lawn: The Village has been impacted by severe urban flooding that has affected hundreds of residents and thousands of commuters. Flooding in the Village makes roads impassable and inundates resident's homes and yards with stormwater for extended periods of time during moderate and severe storm events. Existing drainage issues stem from a lack of conveyance capacity of Stony Creek, lack of detention within the highly urbanized area, and undersized storm sewer infrastructure. Through a partnership with MWRD, the Village of Oak Lawn has spent over a decade investigating solutions to combat flooding and has approved a flood control project near Polaris Intermediate (PIE) School. The project will construct a flood storage basin in the sports fields at PIE, the layout of which has been mutually agreed upon after public presentations, renderings and a recorded stormwater easement. The fields will serve as temporary flood storage for overflow stormwater in the system beyond a 6-month capacity. A new storm sewer system will flow into the fields once the sewer system fills up and slowly release it back into the storm sewer system as the downstream system allows. The project will have no negative downstream impacts and will be permitted through MWRD. An underdrain system will be installed under the sports fields and greatly increase the field's ability to drain water and return to use. The project also benefits the local roads and provides benefit to the IDOT system at IL-50 (Cicero Avenue) and 103rd Street, which has historically been closed numerous times due to flooding.</p> <p>On July 25, 2024, the Cook County Board approved the update to the largest Multi-Jurisdictional All Hazards Mitigation Plan (HMP) ever completed in the United States. Cook County's Department of Emergency</p>	<p>Thank you for your response. Cook County has considered the needs of the community when developing the funding allocations for this grant, and agrees that funds should be directed to programs that address flood risk in the most impacted areas of Cook County. This Action Plan describes programs that seek to address the impacts and underlying causes of flooding, including the Strategic Flood Mitigation Plan, Community Flood Resilience Planning, and Community Flood Infrastructure Improvement Projects which will provide opportunities for communities to engage in resilience planning and facilities improvements. Cook County will coordinate with local jurisdictions and regional partners to identify, evaluate, and prioritize infrastructure projects. Project selection will be conducted by the County based on transparent criteria. We plan to design and launch these programs in early 2026. At this time, we are not soliciting project proposals but will take into consideration community resilience needs and funding gaps in the allocation of these funds. You can find updates on the programs on the County's CDBG-DR website here: https://www.cookcountyil.gov/service/disaster-recovery-and-resilience</p>



Comment Received	Cook County Response
<p>Management and Regional Security (DEMRS) spearheaded the planning process for the 2024 HMP update. The 2024 Cook County Multi-Jurisdictional Hazard Mitigation Plan, which received approval from the Illinois Emergency Management Agency (IEMA) and the Federal Emergency Management Agency (FEMA), means Cook County is eligible to receive funds through FEMA's Hazard Mitigation Grant Program (HMGP). A total of 125 planning partners were involved in the effort, including the Village of Oak Lawn. The Village of Oak Lawn formally adopted the plan on September 24, 2024. Stormwater improvements are heavily discussed in the updated HMP, specifically including the Polaris Park Flood Control Project. The Polaris Park Flood Control Project provides benefits to the residents and commuters through arterial roadways that flood during moderate to severe storm events.</p> <p>The estimated cost for the project is \$13,970,735.00, therefore any funding from Disaster Recovery would be key.</p> <p>I have attached letters of support for the project from MWRD, CHSD 218, Oak Lawn Trustee, and Residents along with a few photos of the area affected.</p> <p>Please strongly consider funding for our regions specifically this infrastructure project.</p>	
<p>Greenprint Partners: Community engagement is crucial for addressing unmet needs targeted by Cook County's flood rehabilitation and resilience program. The County needs a robust public communication strategy to successfully reach residents. For example, the RainReady Calumet Corridor program demonstrates the impact of strategic outreach for high-need residents in the South Suburbs. The program's comprehensive and accessible communication tactics enabled CNT and Greenprint Partners to successfully deploy \$6 million in Cook County ARPA funds while expanding public awareness of green infrastructure solutions. The complementary RainReady Residential Program has delivered immediate flooding relief to homeowners through targeted gray and green infrastructure, proving that effective community engagement drives both program participation and real-world results.</p> <p>Secondly, a portion of the funding and strategic flood mitigation plan should target parks and recreational spaces for climate resiliency designs that also improve the public's access to green spaces. Green spaces offer critical environmental, social and economic benefits to residents as well as a natural buffer to reducing the</p>	<p>Thank you for your response. As outlined in the details for the Community Flood Infrastructure Improvement Projects program, Cook County intends to prioritize nature-based solutions and green infrastructure where feasible. Language within the Action Plan is intended to be broadly applicable to a variety of implementation methods that will be more thoroughly defined within program policy. The County fully supports an understanding of infrastructure and housing improvements that incorporate nature-based solutions that have co-benefits in the community. We will provide specific recommendations for mitigation activities in program policies that will be developed after the Action Plan is approved.</p>



Comment Received	Cook County Response
<p>stormwater burden on traditional gray infrastructure. Will this action plan directly address public parks and recreational green spaces as part of considering green infrastructure improvements?</p> <p>Thank you for the opportunity to contribute comments to the draft action plan.</p>	
<p>Citizen: Our family's story is a testament to the cascading crises that follow a disaster. We are prepared to provide any documentation necessary to validate our situation. We ask that the County's plan be nimble enough to address the severe and complex needs of residents like us, ensuring an equitable distribution of the crucial funds provided by HUD.</p>	<p>Thank you for your response. Cook County's Action Plan aims to meet the unique needs of impacted households. This Action Plan proposes the Residential Flood Rehabilitation and Resilience Program to help residents recover, as eligible under CDBG-DR funding. Once the Action Plan is formally approved by HUD, Cook County's CDBG-DR programming will be finalized. Information regarding eligibility criteria including how to apply for any direct assistance will be published on the Cook County website as available in early 2026. You can find updates on the programs on the County's CDBG-DR website here: https://www.cookcountyil.gov/service/disaster-recovery-and-resilience</p>
<p>Southland Development Authority (SDA): Thanks again for reaching out and for including the Southland Development Authority in this important process. I am attaching our comments that reflect the needs and opportunities for economic recovery and long-term resiliency in our region.</p> <p>While we acknowledge the emphasis placed on infrastructure and housing recovery, we respectfully urge Cook County to revisit the current assessment of "no unmet need" in the area of economic revitalization. Based on our direct engagement with small and medium-sized businesses (SMBs) across the South Suburbs of Cook County, we believe there is a significant and underrepresented need for economic recovery and long-term resiliency support.</p> <p>Economic Recovery Needs in the South Suburbs. The storm events exacerbated long-standing vulnerabilities in our region's economy, particularly:</p> <p>Disruptions and losses for businesses that lacked insurance or access to SBA disaster loans. Many small and minority-owned businesses lacked the insurance coverage, disaster readiness, or credit access to apply for or be awarded SBA loans. Temporary or permanent closures, supply chain disruptions, and damage to storefronts/warehouses left lasting scars.</p> <p>Damage to commercial corridors that now suffer from reduced foot traffic and growing vacancies. Major</p>	<p>Thank you for your response. The County relied on limited economic impact data to assess the disaster recovery of needs and we are exploring additional sources of information to better understand the needs of small businesses that experienced loss or disruption due to the disasters. In subsequent amendments to this Action Plan, the County plans to incorporate updated needs and information, including that of economic development, and will consider allocating funds to individual businesses through programs if warranted. The CDBG-DR grant requirements have stringent requirements around documenting unmet need that ties back to these particular qualifying disasters. In addition to disaster recovery funds, Cook County continues to explore use of other existing and prospective funding sources to meet unmet economic and small business needs and will keep this input in mind accordingly.</p>



Comment Received	Cook County Response
<p>corridors (e.g., Halsted, Dixie Hwy, 159th St) saw increased vacancies and deterioration due to storm damage and already-weak investment trends.</p> <p>Physical infrastructure damage to sites critical for local commerce, logistics, and services. An EF1 tornado swept through Burr Ridge, Countryside, and surrounding southwest suburbs in July 2023, uprooting or snapping countless trees. Cleanup was ongoing days later, with neighbors carrying out much of the debris removal themselves due to overwhelmed municipal capacity. A confirmed EF1 tornado in July 2024 impacted Homewood, Flossmoor, Thornton, and Hickory Hills. Though structural damage was relatively limited, the storms knocked down or stripped limbs from numerous mature trees. In areas like Homewood or Countryside, much of the cleanup defaulted to neighbors or private contractors due to rapid damage spread and limited public response capacity.</p> <p>Many of the businesses most impacted by the storms are informal, undercapitalized, or sole proprietorships, and thus were not captured in federal loan programs. The absence of formal claims should not be mistaken for the absence of real economic loss.</p> <p>Opportunities for CDBG-DR Investment</p> <p>We recommend allocating a portion of the CDBG-DR funding to support:</p> <p>Direct recovery grants and technical assistance for SMBs, with an emphasis on Black, Latino, immigrant, and women-owned businesses.</p> <p>Commercial corridor and storefront revitalization programs that target flood-affected areas.</p> <p>Resiliency-focused infrastructure improvements at or near business hubs, including broadband, stormwater systems, and energy reliability.</p> <p>Disaster preparedness and continuity training delivered through trusted local intermediaries, such as SDA's Business Growth Services program.</p> <p>Equity and Long-Term Impact</p> <p>Investing in economic revitalization in the South Suburbs advances the County's equity goals and ensures that recovery funding reaches communities that have been disproportionately impacted by past disinvestment and environmental risk. This is a critical opportunity to build economic resilience, not just restore pre-storm conditions.</p>	



Comment Received	Cook County Response
<p>We welcome the opportunity to partner with the County to design and implement impactful recovery programs that strengthen our region's small business ecosystem. Thank you for your consideration and leadership.</p>	
<p>Openlands: (Numbers added for clarity of response):</p> <p>1. Attached are comments from Openlands and the Southland Development Authority regarding the Draft Action Plan for the CDBG-DR Funding. Thank you for providing the opportunity to learn more about this work and provide comment.</p> <p>The following comments are submitted by Openlands and the Southland Development Authority (SDA) to the Cook County Department of Planning and Development regarding the draft Action Plan for the CDBG-DR Funding. The intent of these comments is to illustrate how the CDBG-DR action plan can support the "sOUTHsIDE Initiative" as well as how the CDBG-DR funding can leverage efforts by non-profits and community organizations already working on efforts aligned with the goals of this funding.</p> <p>The sOUTHsIDE Initiative is a partnership between the Southland Development Authority and Openlands. The two entities will join forces in an effort to strengthen the emerging tourism and recreation economy across the Southern Tier of the Chicago region and Northwest Indiana. The initiative will build individual and household wealth for the area's talent pipeline of tourism and recreation minded entrepreneurs and business owners while increasing tourism and tax revenue in communities that host some of the best natural assets in the greater Chicago region (see Figure 1).</p> <p>Recovery priorities within the Draft Action Plan are focused on improving stormwater infrastructure and addressing private home flood risk in the most highly impacted areas. Per the plan, impacts were concentrated in specific townships within Cook County and programs will be prioritized in the areas of highest impact – three of which fall within the focus area for the sOUTHsIDE Initiative:</p> <ul style="list-style-type: none"> • Calumet Township • Bloom Township • Thornton Township <p>These townships contain numerous natural assets and publicly owned land (See Figure 2) outlined in Table 1</p>	<p>1. Thank you for your careful review and response. Our response follows the same order of subjects as the original comment.</p> <p>2. Mitigation is interwoven into the outlined programs and seeks to address long-term resiliency needs. The County is basing its definition of mitigation on HUD's requirements to fund activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters. The County fully supports an understanding of resilience that is more comprehensive and will provide specific recommendations for mitigation activities in program policies that will be developed after the Action Plan is approved.</p> <p>3. The County plans to allocate funds to the Strategic Flood Mitigation Plan which will inform its CDBG-DR programs and other investments made by the County. This plan will include substantial outreach and coordination with local partners, including non profits and development entities. Cook County will take this suggestion under review as it develops the planning project and launches that effort.</p> <p>4. Language within the Action Plan is intended to be broadly applicable to a variety of implementation methods that will be more thoroughly defined within program policy. As outlined in the details for the Community Flood Infrastructure Improvement Projects program, Cook County intends to prioritize nature-based solutions and green infrastructure where feasible. The County fully supports an understanding of infrastructure and housing improvements that incorporate nature-based solutions that have co-benefits in the community. In its past CDBG-DR grant, the County has allocated funds to projects that bolster environmental co-benefits and will continue to do so under this grant. We will provide specific recommendations for mitigation activities in program policies that will be developed after the Action Plan is approved.</p> <p>5. The Home Rehabilitation program will be targeted to existing homeowners impacted by the qualifying</p>

Comment Received	Cook County Response
<p>below. The existing assets identified in Table 1, such as Burnham Prairie, Burnham Greenway, Sand Ridge, Plum Creek Preserve, and the entire Thorn Creek corridor could leverage CDBG-DR funds to meet objectives for flood resilience and also meet the objectives of the sOUTHsIDE Initiative to build an outdoor recreation economy focused within these three townships most affected and beyond.</p> <p>The Draft Action Plan for CDBG-DR funding outlines programs within three areas: Planning, Housing and Infrastructure. The comments below from Openlands and the Southland Development Authority are organized under these three areas of funding.</p> <p>2. The definition of resilience needs to be more at the forefront in the Action Plan. Resilience includes social, environmental and economic aspects as noted in the planning program descriptions. The planning projects need to identify how these funds can meet multiple objectives including the improvement of the capacity of the natural stream channels to contain runoff and also create, enhance or support tourism and economic development goals.</p> <p>3. Openlands and the Southland Development Authority should participate on the steering committee in the creation of both plans: the Strategic Flood Mitigation Plan and the Community Flood Resilience Planning to align and leverage existing partners, non-profits and agencies already doing resiliency work within the target areas. The selection of the consultants for both plans needs to ensure the teams include expertise in recreation economy and tourism planning. The planning should include a market analysis for the sOUTHsIDE Initiative as a deliverable within the Strategic Flood Mitigation Plan. The program descriptions for planning fail to call out proximity to existing natural assets or bolstering existing natural assets as tourism destinations. The tourism economy, including workforce development related to its remediation and enhancement, needs to be at the forefront within the planning process. The market analysis should research the feasibility of tourism opportunities in the region and review what is needed to support a new tourism economy; this includes defining the tourism and recreation industry sectors, occupations, activities, and commodities as well as gain a better understanding of the market capture area and growth potential. Based on the market analysis, programs can be established to develop a pipeline of entrepreneurs interested in</p>	<p>disasters. The program will support home rehabilitation and mitigation activities that reduce future flood risks. The Strategic Mitigation Plan will focus - in part- on identifying opportunities for housing development in areas that have low flood risk and optimize environmental conservation. Cook County will take this suggestion under review as it develops the planning project and launches that effort.</p> <p>6. The Residential Flood Rehabilitation and Resilience Program is based off of unmet needs reported from communities and disaster-impact data and is focused on existing homeowners. The County also plans to focus resources on public facilities and infrastructure under respective programs. At this time, given the limited resources and needs identified, the County is limiting program allocations to highest needs, but will continue to gather information about needs and update allocations as necessary.</p> <p>7. Thank you for this suggestion. Language within the Action Plan is intended to be broadly applicable to a variety of implementation methods that will be more thoroughly defined within program policy. The County fully supports an understanding of infrastructure and housing improvements that incorporate nature-based solutions that have co-benefits in the community. We will provide specific recommendations for mitigation activities in program policies that will be developed after the Action Plan is approved.</p> <p>8. Thank you for this suggestion. The County plans to allocate funds to the Strategic Flood Mitigation Plan which will inform its CDBG-DR programs and other investments made by the County. This plan will include substantial outreach and coordination with local partners, including non profits and development entities. Cook County will take this suggestion under review as it develops the planning project and launches that effort.</p>



Comment Received	Cook County Response
<p>starting or pivoting businesses to recreation or eco-tourism, leveraging the market research to determine capital investment needs and opportunities. From there, the sOUTHsIDE Initiative proposes the design and pilot of a training program for a cohort of entrepreneurs integrating access to capital partners and small business training opportunities. The Thorn Creek corridor is an excellent location to demonstrate this initiative. The Thorn Creek corridor has numerous public lands adjacent to it as well as the overlap of three nationally and regionally recognized trails converging in this corridor: The American Discovery Trail, The Chicago Outerbelt and the Grand Illinois Trail. These existing assets, and its proximity to accessibility from the region via access off of I-80 make it extremely marketable (see Figure 3).</p> <p>4. The Community Flood Infrastructure Improvement Projects need a stronger emphasis on tree canopy as a strategy to achieve the objectives. Urban forestry needs to play a stronger role within this funding allocation and program development. Alignment exists with work already being done by Openlands' robust Forestry department working to plant diverse tree species within the Chicagoland area as well as train hundreds of people per year to care for the tree canopy within the TreeKeepers Certification and Program. Additionally, the Southland Development Authority and other southside partners such as NeighborScapes and Friends of the Forest Preserves are already engaged in related work. The Community Flood Infrastructure Improvement Projects description fails to call out proximity to existing natural assets or bolstering existing natural assets as tourism destinations. If the goal is to develop long-term co-benefits, then these natural assets and destinations within these target areas need to be explicitly identified and called out. The Residential Flood Rehabilitation and Resilience Program should include more explicitly the addition of trees as a method to improve rainwater capture and provide community cooling through shade. While it lists rain gardens, rain barrels, and the like, it does not explicitly call out tree planting as an opportunity for investment. Further, this is an opportunity to partner with Cook County to fold in the Forestry Department and forestry programs within Openlands. In addition, new programs could be modeled after the Flossmoor cost sharing program where homeowners share costs of street trees with the municipality.</p>	



Comment Received	Cook County Response
<p>5 The Residential Flood Rehabilitation and Resilience Program could also include strategies or incentives for integrating parks and open space into new housing developments.</p> <p>6. The proposed housing programs could be expanded beyond residential properties to achieve the goal of reducing flood impacts to private properties. The existing Space to Grow program with Openlands transforms Chicago schoolyards to capture rainwater and prevent flooding through the same techniques called out in the program summaries: rain gardens, native plantings and gardens, permeable asphalt, permeable pavers, water storage under parking lots and turf fields, permeable rubber play surfaces, tree plantings and much more. Each STG schoolyard captures 150K-450K gallons minimum per rainstorm event. With more than 760 acres of impermeable surface in a highly urbanized area, public schoolyards within the most affected areas present a significant opportunity for changing the way stormwater is managed within those communities.</p> <p>7. The outlined programs do not mention blue roofs or green roofs or streambank/riparian restoration but should in order to align the Action Plan with these supplement plans by MWRD; "No mow" Areas already exist within the most highly affected areas targeted for funding. These need to be better managed and improved with seeding in order to expand their capacity for flood mitigation. The management of these areas presents a workforce development opportunity for resilience in under-resourced communities. "No mow" Areas already exist within the most highly affected areas targeted for funding. These need to be better managed and improved with seeding in order to expand their capacity for flood mitigation. The management of these areas presents a workforce development opportunity for resilience in under-resourced communities; Consideration should be given within the programming allocation for strategic land acquisition to preserve ecologically sensitive areas and or areas adjacent to existing natural assets that can contribute to flood mitigation capacity. Nonprofits such as Openlands are already engaged in this work in the targeted areas. CDBG-DR funding could address workforce development for maintenance of green stormwater infrastructure. This funding could mirror Openlands' TreeKeepers framework to create workforce development programs around ecological restoration and green stormwater infrastructure maintenance</p>	



Comment Received	Cook County Response
<p>through apprenticeship programs. Funding should be allocated for establishment and ongoing maintenance timeframes for green stormwater and tree canopy investments.</p> <p>8.The development of a recreation economy aligns with state level grant funding which could be leveraged to bolster CDBG funding in this area: Governor Pritzker Announces 36 Awards Through Tourism Grant Programs. The Tourism Attractions Grant Program will provide funding for the development or improvement of tourism attractions in Illinois, such as museums, recreation areas, amusement parks, and more. The goal of the program is to provide assistance for projects that increase the economic impact of tourism throughout Illinois by increasing visitation rates, boosting hotel occupancy, increasing local hotel and sales tax revenue, and more. Openlands and the Southland Development Authority are engaged with several partners and collaborators already working within the focus areas of this scope including the Outerbelt Alliance, NeighborScapes, Midwest Underground Railroad Network, the Trust for Public Land, Riverdale Community Land Trust and People for Community Recovery. These entities should help coordinate engagement within the planning processes</p>	
<p>Citizen: Yeah just thinking about if more open space or natural areas are created in an effort for flood retention, Is there opportunities to think about, other types of planning that would aid in creating outdoor opportunities for municipalities, building on these open space that would be created that would retain flooding water, sorry it's 6:40 so I'm not explaining myself really well.</p>	<p>Thank you for your response. Language within the Action Plan is intended to be broadly applicable to a variety of implementation methods that will be more thoroughly defined within program policy. As outlined in the details for the Community Flood Infrastructure Improvement Projects program, Cook County intends to prioritize nature-based solutions and green infrastructure where feasible. The County fully supports an understanding of infrastructure and housing improvements that incorporate nature-based solutions that have co-benefits in the community. In its past CDBG-DR grant, the County has allocated funds to projects that bolster environmental co-benefits and will continue to do so under this grant. We will provide specific recommendations for mitigation activities in program policies that will be developed after the Action Plan is approved.</p>
<p>Citizen: Will this funding help small businesses?</p>	<p>Thank you for your response. The County relied on limited economic impact data to assess the disaster recovery needs, and we are exploring additional sources of information to better understand the needs of small businesses that experienced loss or disruption due to the disasters. In subsequent amendments to this</p>

Comment Received	Cook County Response
	<p>Action Plan, the County plans to incorporate updated needs and information, including that of economic development, and will consider allocating funds to individual businesses through programs if warranted. The CDBG-DR grant requirements have stringent requirements around documenting unmet need that ties back to these particular qualifying disasters. In addition to disaster recovery funds, Cook County continues to explore use of other existing and prospective funding sources to meet unmet economic and small business needs and will keep this input in mind accordingly.</p>
<p>Citizen: Green space/resilient/open space?</p>	<p>Thank you for your response. Language within the Action Plan is intended to be broadly applicable to a variety of implementation methods that will be more thoroughly defined within program policy. As outlined in the details for the Community Flood Infrastructure Improvement Projects program, Cook County intends to prioritize nature-based solutions and green infrastructure where feasible. The County fully supports an understanding of infrastructure and housing improvements that incorporate nature-based solutions that have co-benefits in the community. In its past CDBG-DR grant, the County has allocated funds to projects that bolster environmental co-benefits and will continue to do so under this grant. We will provide specific recommendations for mitigation activities in program policies that will be developed after the Action Plan is approved.</p>
<p>Citizen: will immigrants be able to apply for this funding?</p>	<p>Thank you for your question. Each program description within the Action Plan includes the list of eligible entities that can apply. For the Residential Flood Rehabilitation and Resilience Program, eligible entities are restricted to Cook County homeowners. Further eligibility details will be available within program policy manuals.</p>
<p>Citizen: Do we have an idea of how a buyout will be determined and if the resident has the power to say no and how will that affect them?</p>	<p>Thank you for your question. Cook County has not included any residential or commercial buyout programs within the Action Plan.</p>
<p>South Suburban Mayors and Managers Association: A lot of the south suburbs were affected by storm events. Individual communities were struggling with FEMA to qualify and there was an effort to pool small businesses, however, there was frustration for not recognizing and enrolling individual businesses. It seems like there is insufficient funding for small businesses</p>	<p>Thank you for your response. The County relied on limited economic impact data to assess the disaster recovery needs of businesses and we are exploring additional sources of information to better understand the needs of small businesses that experienced loss or disruption due to the disasters. In subsequent amendments to this Action Plan, the County plans to incorporate updated needs and information, including</p>

Comment Received	Cook County Response
<p>Also, some municipalities have implemented a program to address sump pump and sewer systems—will these be available? The demand is out there. SSMMA has put together (for the last 7 years) infrastructure values on tracking estimate costs. SSMMA will send information to Cook County.</p> <p>We also need to think about long-term infrastructure and recognize that it is not just the FEMA's level of rebuilding, but to ensure full remediation of homes, especially as 100 year events are happening far more frequently</p>	<p>that of economic development, and will consider allocating funds to individual businesses through programs if warranted. The CDBG-DR grant requirements have stringent requirements around documenting unmet need that ties back to these particular qualifying disasters. In addition to disaster recovery funds, Cook County continues to explore use of other existing and prospective funding sources to meet unmet economic and small business needs and will keep this input in mind accordingly. Additionally, the Residential Flood Rehabilitation and Resilience Program, Community Flood Mitigation Infrastructure, and Planning efforts all aim to repair and improve current water run off infrastructure, lessening future flooding damage to whole communities, including businesses.</p>
<p>16th District of Cook County: Is there funding that addresses health hazards (mold, etc.) caused by flooding?</p>	<p>Thank you for your question. At this time, Cook County has allocated funds in the Action Plan to focus on home and infrastructure upgrades that will mitigate the hazardous impacts of flooding in future severe weather events. We are considering expansion of the home repair and rehabilitation program based on demand and updated needs assessments for a future amendment to this Action Plan.</p>
<p>Kellogg: The County is doing a good job thinking about how to mitigate from a public point of view. The other side of the coin is insurance. State Farm is raising rates over 11%. My question to the county as a whole and other policy leaders—how are you addressing this as a long term solution and factoring that more frequent insurance challenges will impact businesses and households?</p>	<p>Thank you for this question. While Cook County cannot change insurance policy, we acknowledge that risk and the insurance marketplace are inherently linked. The County is implementing risk reduction strategies across all of its programs, such as the Residential Flood Rehabilitation and Resilience Program, which aims to lessen future flood damage, lowering the rate of needed claims and removing the cost burden from residents for their system upgrades.</p>
<p>Respond Now Chicago Heights: The one thing that I wonder about regarding affordable housing is the immediate needs of people, especially renters. How are those needs addressed? Are there other mechanisms to help with remediations with different programs?</p>	<p>Thank you for your question. The federal government allocated Community Development Block Grants for Disaster Recovery in support of long-term recovery functions. Immediate recovery functions and services are typically handled by local emergency management, insurance, non-profits, and the Federal Emergency Management Agency. While there is some flexibility in CDBG-DR to provide direct services to affected residents, the County determined the disaster related need is not supported by needs data. We remain open to considering additional direct assistance programs if new data indicate that is an urgent need in the community.</p>

7.2 Cook County Disaster Impacts Survey Responses

Cook County conducted an online survey of local leadership and stakeholders, the Cook County Disaster Impacts Survey, about their unmet needs. Responses received through August 1, 2025 were analyzed, and this data will be updated as the County receives additional response information. Currently, 36 respondents out of 95 municipalities that received the survey have provided answers to the survey. The following are summaries of many of the quantitative results. Sometimes individual responses do not sum to the total. To clearly communicate only relevant data, we have excluded non-responses or responses that are not applicable when summarizing the data in the following tables.

Table 59: Survey Question - Disaster Identification

Which 2023 and/or 2024 disasters in Cook County was your community impacted by?	Number	Percentage
Severe Storms and Flooding, June 29, 2023 – July 2, 2023	21	32.31%
Severe Storms and Flooding, Sept. 17, 2023 – Sept. 18, 2023	20	30.77%
Severe Storms and Tornadoes, July 13, 2024 – July 16, 2024	24	36.92%
Total Responses (some respondents listed multiple)	65	100%

Table 60: Survey Question – Remaining Recovery Needs

Are there any remaining recovery needs in your community related to housing, infrastructure, or economic interests that you can identify?	Number	Percentage
Yes	21	58.33%
No	15	41.67%
Total Responses	36	100%

Table 61: Survey Question – Remaining Need Description

If yes, please describe remaining needs.	Category	Number	Percentages
Infrastructure (sewer, storm water, storm drainage)		16	76.19%
Other (public works, tree trimming, private property)		5	23.81%
Total Responses		21	100%

Table 62: Survey Question – Commercial Districts/Businesses

Did your community experience any impact to commercial districts and/or businesses?	Number	Percentage
Yes	12	33.33%
No	24	66.67%
Total Responses	36	100%

Table 63: Description of Impacts to Commercial Districts/Businesses

If yes, please describe impacts	Category	Number	Percentages
Flooding		7	58.33%
Sewer back ups		2	16.67%
Other		3	25%
Total Responses		12	100%

Table 64: Survey Question – Infrastructure/Public Facilities

Did your community experience any impact to infrastructure or public facilities?	Number	Percentage
Yes	16	45.71%
No	19	54.29%
Total Responses	35	100%

Table 65: Description of Impacts to Infrastructure

If yes, please describe impacts	Category	Number	Percentages
Power Outages		3	18.75%
Sewer Back Ups/Flooding		7	43.75%
Public Building Damage		4	25%
Other		2	12.50%
Total Responses		16	100%

Table 66: Survey Question – Priority Rankings

Below is a list of projects that could help your community to recover from the disaster and mitigate future hazard risk. Please rank them based on which ones are high priority for your community on a scale of 1-3.	1= Low priority	2= Medium priority	3= High priority
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Infrastructure – Transportation, Utilities, Social/Public Facilities, Mitigation infrastructure, Green/Nature-based Infrastructure	2	4	26
Housing – Multi-family/rental rehab/recon, Single-family rehab/recon, Affordable Rental Housing, Mobile/Manufactured housing	11	12	7
Business/Commercial – small business assistance	11	6	11
Mitigation/Hazard Risk Reduction	5	9	12
Total Responses	29	31	56

Table 67: Mitigation Needs

Which Mitigation/Hazard is most important?	Number	Percentage
Infrastructure/facilities hardening, retrofits, and improvements	13	48.15 %
Planning, hazard risk assessment	3	11.11%
Developing more resilient building codes	1	3.70%
Residential Buyouts	2	7.41%
Residential hardening/retrofits/elevations	4	14.81%
Other	4	14.81%
Total Responses	27	100%

Table 68: Mitigation Qualitative Responses

If "Other" selected, please explain.

Infrastructure repairs to culverts and ditches to avoid flooding with future storms.

This question only allows you to pick one, whereas it asks "which projects". We would pick infrastructure facilities hardening and improvements along with residential buyouts

Table 69: Survey Question – Insurance Claims

Does your community still have unmet needs after insurance claims?	Number	Percentage
Yes	11	30.56%
No	25	69.44%
Total Responses	36	100%

Table 70: Insurance Unmet Needs Qualitative Responses

If yes, describe unmet needs after insurance.
Back-up power for village hall, police station, fire station
Insurance does not cover tree removal to prevent future damage from structurally damaged and unsound trees.
105th St and 82nd Ct Lift station replacement
Most residents did not have insurance to cover losses.
We did not file any insurance claims but there is still a need to repair culverts and ditches.
Insurance did not cover the damage to the North Riverside Police Department Roof.

unknown at this time
Time and materials for improvements and improvements.
substantial damage exists for infrastructure located within the Village right-of-way which insurance claims were not applicable. We do not have an inventory of private residential or commercial losses.
There is a gap between what insurance pays and actual costs. Flood control etc are also not typically covered

Table 71: Survey Question – Community Insurance Data

Did your community collect any information/data about insurance claims and reported losses after the 2023 and 2024 disasters?	Number	Percentage
Yes	3	8.33%
No	33	91.67%
Total Responses	36	100%

Table 72: Survey Question – Insurance Data Type

If yes, specify information by selecting all that apply.	Number	Percentage
Total amount of losses incurred due to the disaster (city-wide if available)	3	60%
Claims that resulted in a loss related to the disaster	1	20%
Residential insurance claims	1	20%
Total Responses	5	100%

Table 73: Qualitative Response – Insurance Data

If yes, what was the total amount of claims and please describe data.

We have a mechanism for residents to report the amount of flooding, damages with pictures.

Business owners filled out damage forms and was mailed to each business in town. The amounts are not totaled that we know of and was done as part of the declaration of disaster with Cook County.

Table 74: Survey Question – Persons Experience Homelessness

Were there any impacts to persons experiencing homelessness at the time of the disasters or as a result of the 2023 and 2024 disasters?	Number	Percentage
Yes	1	2.78%
No	35	97.22%
Total Responses	36	100%



7.3 Certifications Waiver and Alternative Requirement for Action Plan Submission

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

a. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan - The grantee certifies that it: (1) will comply with the acquisition and relocation requirements of the Uniform Relocation Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements, and (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

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

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

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

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

f. Use of Funds - The grantee certifies that it is complying with each of the following criteria:

(1) Purpose of the Funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic

revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

(2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) Overall Benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70% (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

(4) Special Assessment. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds by assessing any amount against properties owned and occupied by persons of low or moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title, or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause A above.

g. Grant Timeliness - The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

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