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GOVERNOR

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Adam Gregg
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September 7, 2018

The Honorable Donald Trump
President of the United States
The White House
1600 Pennsylvania Ave.
NW Washington, DC 20500

Regional Administrator Paul Taylor
FEMA Region VII
11224 Holmes Road
Kansas City, MO 64131

Dear Mr. President:

Under 44 CFR 206.46, I am respectfully appealing your August 21, 2018, letter denying Individual Assistance under FEMA-4386-DR for Buchanan, Dickinson, Polk, and Winnebago counties. We offer the following additional information for your consideration of my appeal.

CORRECTION TO PREVIOUS ASSESSMENT

Since submission of my request on August 1, 2018, for a Presidential Disaster Declaration for flooding that occurred from June 6 to July 2, 2018, an error was discovered in the assessment of apartment buildings in the city of Des Moines (Polk County). It appears two apartment complexes with multiple residences that were assessed as having major damage were only counted as one structure, not as individual residences as per the Damage Assessment Operations Manual, dated April 5, 2016. Page 50 of that manual states: "Individual apartment units that are not habitable due to damage to lower floors should also be included in the assessment."

According to the manager of the Parkside East Apartments, located at 3560 E. Douglas Ave., all of the 144 families living in the complex were evacuated from their apartments for at least 30 days. Forty-eight of those families will not be able to return for at least four months due to the high level of damage to the first-floor apartments. Data entered on the Joint Preliminary Damage Assessment (JPDA) tool showed that one renter was categorized at a major level of damage, however, the number "60" is annotated in the margin on the form. At this location, at least 60 renters, not one, should have been designated in the major damage category, for a difference of 59. These apartments are bordered by Fourmile Creek, which caused major flooding on June 30, 2018. All units are rent controlled for low-income residents.

Damage assessment data on the second apartment complex, Dove Park Apartments, located at 2519 Clarkson Ave., indicates there was only one apartment that sustained major damage. As in the Parkside East assessment data, multiple apartments were counted as only one structure. Data from the JDPDA tool shows the number “16” was noted in the margin. During the local and state damage-assessment process, “Restrict public access to basement, electrical system replacement,” and “Major damage,” were indicated for this address. The apartment building has 16 residences in the one affected building. Therefore, the count should have been 16, not one, for a difference of 15.

Given that we can account for 85 major and 17 destroyed properties, it is our belief the numbers were underreported from the JPDA tool and were underreported to FEMA in their calculations. Our research shows there were no instances of underreporting in the other requested counties.

Based on this additional information, the Polk County residential damage totals should be adjusted to 159 in the category of major. We concur with the previous count of 17 destroyed structures in Polk County.

June 6-July 2, 2018, FEMA IA Joint Preliminary Damage Assessment Data												
County	Affected		Minor		Major			Destroyed		Total by County	Total Insured	
	#	Ins	#	Ins	#	under-reported*	new total	Ins	#			Ins
Buchanan	1	1	0	0	1	0	1	1	0	0	2	2
Dickinson	0	0	0	0	1	0	1	0	0	0	1	0
Palo Alto	0	0	0	0	0	0	0	0	0	0	0	0
Polk	4,629	3	1,352	15	85	74	159	6	17	2	6,083	26
Sioux	0	0	0	0	0	0	0	0	0	0	0	0
Winnebago	0	0	11	1	3	0	3	0	1	0	15	1
Total:	4,630	4	1,363	16	90	74	164	7	18	2	6,101	29

*Denotes 59 at 3560 E. Douglas Ave. and 15 at 2519 Clarkson Ave.

IMPACTS TO CITIZENS AND FIRST RESPONDERS

Throughout the month of June and into early July 2018, the state of Iowa experienced severe weather in the form of high winds, severe thunderstorms, hail, tornadoes, flash flooding, and riverine flooding. For more than three weeks emergency responders, and in some cases regular citizens, were called to service. Thousands of households were displaced either through emergency evacuations or damage to their homes. More than 200 people were rescued from their vehicles, trees, mobile home parks, senior living facilities, and apartment complexes due to widespread flooding. The largest number of rescues occurred in Polk County, where severe flash flooding forced emergency personnel to work through the night, performing more than 150 rescues. In Urbandale, one home exploded after a pilot light was extinguished by flash flooding. The parents living in the home rescued their two children just before the home exploded. In one day, nearly 400 calls for assistance in Polk County alone overwhelmed local emergency personnel. Throughout this event, only one fatality was reported.

Because these weather events displaced thousands of people across 31 counties, I implemented the State of Iowa Individual Assistance Grant Program to provide aid to those in the most dire straits. This program makes available grants of up to \$5,000 for families with incomes of up to 200 percent of the federal poverty level (\$41,560 for a family of three). Qualifying expenditures range from personal property to food assistance, to home and vehicle repairs or temporary housing. While these limited resources assist with short-term recovery, they do not address the long-term issues associated with living in a water-damaged home or the loss of a vehicle.

Currently there are 450 applications for the State Individual Assistance Grant Program under review. Managers of this program report that 200 households had received more than \$500,000 in direct assistance for these weather events, and expect total funds expended for this program to exceed \$2 million.

Despite the significant State investment in this program, the majority of households affected by this disaster do not qualify for this grant funding because their incomes exceed the program's eligibility guidelines. When the State Individual Assistance Grant Program is activated, Disaster Case Management Program services are also activated, to provide disaster resource coordination support for all households in the impacted areas, regardless of income. The case management program is actively working cases with very limited resources. Activities include working with voluntary organizations to provide food assistance, replacement of personal property, home repair, car repair, and temporary housing.

The community action organizations that administer the state's Disaster Case Management Program report that 50 percent of their requests for assistance come from elderly and/or disabled residents. These residents are ill-equipped to deal with mold in their basements. Many have mobility issues, making it particularly challenging to do the necessary work of navigating stairs to remove water-damaged items from their basements. Because elderly people are more likely to suffer negative impacts from exposure to mold, many face serious health implications. While voluntary organizations, such as VOADS, are still active in impacted areas, many have deployed to assist with disaster events in other parts of the state, or have run out of supplies or volunteers needed to assist those with unmet needs.

In the last three weeks, staff with IMPACT Community Action (the community action organization that serves Boone, Jasper, Marion, Polk, and Warren counties) processed 760 unique requests for assistance. Forty percent of these requests have not been matched with an available resource. An additional 2,000 similar requests are anticipated by this organization as individual needs will change with the approach of colder weather conditions. Sixty-three percent of unfilled requests involve the replacement of personal property. IMPACT staff believe residents are reallocating their available funds for the purposes of repairing their homes versus replacing items lost in the flooding.

An IMPACT Community Action update on activities includes a narrative of the most common issues they are experiencing: "Some families have had to choose between mold remediation and replacement of essential appliances. One 70-year-old woman has been without hot water since July 1. She has delayed obtaining a hot water heater with the grant as she works to determine the cost to repair the cracks in her foundation and the cost of mitigating the mold growing in her basement."

There are many other impacts to households that local and state government will need to address in absence of federal funding. Polk County is committing funding to purchase flooded homes in the Fourmile Creek neighborhood. Other communities are reallocating Local Housing Trust Fund Program dollars to assist with home repairs. Community action organizations are stretching resources for the aid of disaster victims, but in the upcoming months can easily foresee a shortfall of resources as the weather changes (e.g., when low-income residents will need assistance with the cost of heating their homes). When local and state resources are reallocated to disaster assistance, regular services and projects are compromised. Long-term projects associated with road improvements, utility protection, education, and healthcare are at risk for long delays in implementation. Federal resources would allow the state and affected local communities the flexibility to address disaster impacts while minimizing the impact on long-term objectives.

ROLE OF PRIOR HAZARD MITIGATION EFFORTS

Over the last 30 years, the 33 counties that were within the affected area of this flood event were able to avoid residential losses in their communities. Previous mitigation efforts are estimated to have avoided losses of \$73,410,413 (969 residential structures), an amount that considers additional loss avoidance from areas that did not have impacted structures from flooding.

Buchanan County reported one structure with major damage from a tornado during this incident period. During this same timeframe, more than \$300,000 in flood damage to public infrastructure was documented during the Public Assistance JPDA. The Buchanan County Emergency Management Agency indicates that since 1999, 112 structures have been acquired in the area affected by flooding. An analysis of the rainfall amounts and previous location of these structures suggests that basement flooding would have been widespread in the area. The loss avoidance estimate for Buchanan County is \$2,151,184.

Three weeks after the flooding in Polk County, an analysis of the National Flood Insurance Program (NFIP) claims highlight the following impacts:

- The number of insured structures impacted during this incident period had the second highest per month average (70) of NFIP claims since 1978. Only 1993 had a higher average (90).
- The number of property acquisitions since 1993 significantly reduced the flooding impact from this event. The Fourmile Creek Neighborhood is an excellent example of mitigation contributing to loss avoidance. (See attachment.)

According to the city of Des Moines' Community Development Office, 75 percent of the destroyed structures were in the regulated floodplain. Fifty percent of the major and 15 percent of the minor damaged structures were outside of the floodplain. Since 1993, the City of Des Moines has leveraged \$20,285,628 to acquire 323 properties.

The State of Iowa continues to implement hazard mitigation projects for the purposes of flood risk reduction. The previous work and loss avoidance demonstrated during this flood event highlight the value of hazard mitigation and the State's commitment to save taxpayer dollars in future disasters.

Despite the State's significant investment in hazard mitigation activities in the affected area, federal assistance is still needed in extreme cases such as this.

OTHER RECENT DISASTERS

On August 17, I submitted a second disaster declaration request for four counties that were impacted by severe storms and tornadoes on July 19, and am currently awaiting a response to that request. The cumulative and far-reaching effects of the tornadoes that tore across central and eastern Iowa on that day have only increased the need for federal assistance as our local and state resources are exhausted.

On August 21, I created the Marshalltown Housing Recovery Task Force to assist with the coordination of resources between our federal, state, non-profit, and local partners. This task force will focus on resources that support community resilience objectives for long-term recovery. The following are examples of what the group's future efforts will include:

- Iowa State University's community and regional planning graduate students will dedicate time to the city of Marshalltown's redevelopment plan. This will include providing architecture and design expertise to rebuilding efforts in the northeast part of town, where the majority of the destroyed structures are located.
- Marshalltown's housing and community development team requests assistance with the process of structurally assessing the hundreds of affected homes in their city. The Iowa Finance Authority, Iowa Department of Public Safety, Iowa Department of Homeland Security and Emergency Management, and the Mid-Iowa Community Action organization will offer technical assistance with a plan to rehabilitate, rezone, or demolish structures to improve opportunities for resilience.
- If a Public Assistance declaration is authorized for this event, resources necessary to protect public health and property, and the ability to reside at home until permanent repairs can be made will be requested. One potential resource is the Sheltering and Temporary Essential Power (STEP) program.

Below is a summary of resources that have been expended, along with recovery needs identified during the joint local/state/FEMA preliminary damage assessments.

- Thousands of vehicles were destroyed in the areas affected by flash flooding and tornadoes. Vulnerable populations (low- to very low-income families) have few resources to replace a vehicle, adding additional hardship to those who must now find alternatives for commuting to work, medical visits, etc. Community action organizations, under the state Individual Assistance program, can provide up to \$500 for repairing vehicles. However, staff report these resources are almost always insufficient for the repair of a flooded vehicle.
- Communities in Polk and Marshall counties are struggling to address unmet needs. Based on a recent housing study, the city of Marshalltown has a tight housing market for low-income residents. Even before the tornado impacted more than 1,800 structures in Marshalltown, the waiting time for Section 8 housing was one year or more. Many of the areas impacted by flooding in Polk County were populated largely by low-income residents.

- Based on the JPDA and the current NFIP information, there are thousands of homes that lack insurance coverage for needed repair work. Residents in minor and affected homes overwhelmingly lived outside the regulatory floodplain and were victims of flash flooding related to historic amounts of rainfall in a short time frame. If resources are not allocated in the near future, foundation repair will become difficult to complete before the winter months. Once the ground freezes, other health and safety issues are anticipated.
- An initial review of the damage to “affected” and “minor” structures in the city of Marshalltown suggests the dollar amount needed to complete repairs will, in many cases, exceed the value of the structure. In certain parts of the city, homes have been owned by the same families for multiple generations. Based on the assessment work done with VOAD organizations, only 26 percent of the affected structures were insured.
- As time progresses, the potential for health hazards for residents in these damaged structures will grow. The older structures in Polk and Marshall counties are known to contain lead paint. The presence of lead paint poses a potential health hazard to children living within the structures. Asbestos and other hazardous materials need to be remediated. Flood-damaged structures also pose a significant health risk due to the increasing risk of mold growth the longer homes go without proper treatment and cleaning to remediate the growth of mold.
- Hundreds of structures in Polk and Marshall counties have roof damage. Each time water enters a business or home, more damage occurs. There are insufficient resources in these communities to address roof repair needs. The longer additional resources are delayed, the potential for additional damage increases. In the last week, both Polk and Marshall received 8 inches of additional rainfall. The National Weather Service issued flash flood warnings for both counties for the majority of the Labor Day holiday weekend.

As you consider the additional information in this appeal, it is vital to also consider the additional severe weather and heavy rainfall that continues to impact these same areas. Individual Assistance related to this event will be a vital tool in getting our affected families, businesses, and communities back on the road to recovery. Based on the more complete information related to the severity and magnitude of this disaster to the state of Iowa, I am asking for an Individual Assistance declaration for Buchanan, Dickinson, Polk, and Winnebago counties.

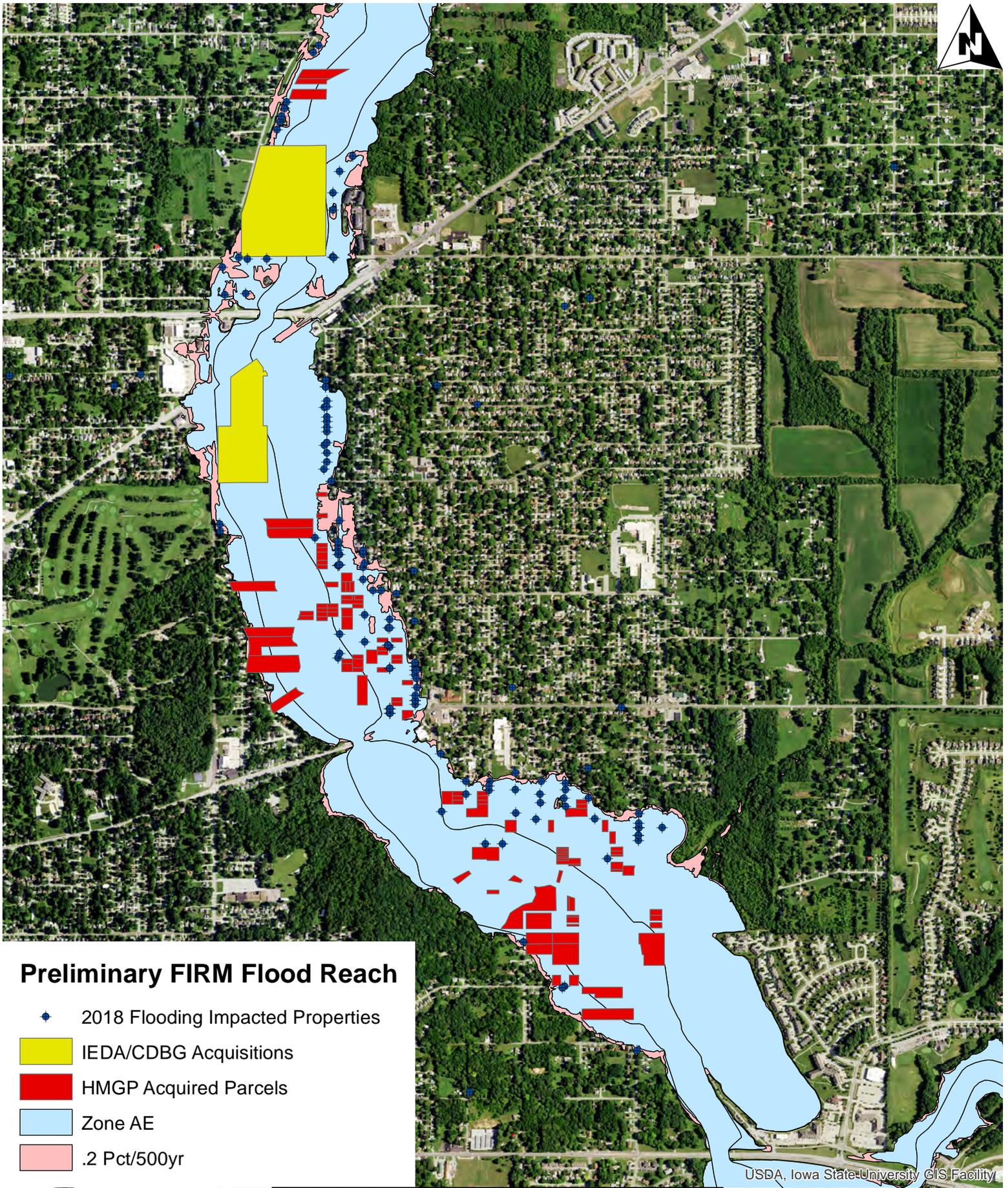
Sincerely,



Kimberly K. Reynolds
Governor, State of Iowa

Enclosures:

Preliminary FIRM Flood Reach map (Fourmile Creek area)



Preliminary FIRM Flood Reach

-  2018 Flooding Impacted Properties
-  IEDA/CDBG Acquisitions
-  HMGP Acquired Parcels
-  Zone AE
-  .2 Pct/500yr

USDA, Iowa State University GIS Facility



Fourmile Creek
DR-4386
IA Appeal

User Name: tebrown
Date: 9/7/2018