Community Development Block Grant Disaster Recovery 2022 Unmet Needs Assessment

Oklahoma Department of Commerce Community Development Division

OKLAHOMA Commerce

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Overview

HUD allocated $7,430,000.00 million to the State of Oklahoma to address unmet needs from the May 2022 severe storms, tornadoes, and flooding. HUD has identified the Muscogee (Creek) Nation and the 74447 ZIP code of Okmulgee County as the MID areas. Oklahoma has decided to expand the HUD-identified MID area in ZIP code 74447 to include the entirety of Okmulgee County. The State of Oklahoma is required to spend 80% of funds on HUD-identified MIDs. The State is designating Adair, Cherokee, Muskogee, Pottawatomie, Seminole, and Tulsa Counties as state-identified most impacted and distressed areas. These counties still have approximately $6,300,000.00 million in remaining unmet housing needs because of the disaster and would be well-served by the remaining funds for recovery.

Much of the damage from the disaster to homes was because of tornadoes and flooding. One representative working on disaster case management in an impacted area stated, “Everyone needed a roof,” because of tornadoes in Seminole and Pottawatomie Counties. The initial FEMA preliminary damage report estimated that 599 residences were impacted by DR-4657, with most residences experiencing minor or major damage. Disaster damage data confirmed that the disaster was primarily a housing disaster, with some impact on businesses and nonprofits.

Infrastructure within the Muscogee (Creek) Nation was also greatly impacted, resulting in a disaster declaration that authorized FEMA public assistance funds for the tribe. Representatives of the Nation report multiple flooded, collapsed, and damaged roads, impacting access to medical facilities.

The analysis below and the limited amount of funding available for recovery from this disaster are the primary drivers of the program design identified in Section 4 of the Action Plan. Due to limited funding, the state will still have over $4,000,000.00 in identified unmet needs from the disaster. The largest driver of community recovery from the impacts of the disaster will be rebuilding residential housing which will catalyze economic recovery through the return and expansion of a local tax and customer base - and repairing damaged infrastructure. The investments in housing and infrastructure will promote rebuilding and recovery while increasing resilience to future disasters.

Housing Unmet Need

Disaster Damage and Impacts

Pre-disaster housing conditions:

In 2015, an Oklahoma Housing Needs Assessment was conducted to evaluate current housing conditions in the state at a county level and to project future housing needs into 2020. This comprehensive housing study found that Oklahoma would need 66,821 new housing units through 2020 to accommodate the state's growing population.

Note: Integra Realty Resources, "Statewide Housing Needs Assessment Executive Summary," Oklahoma Housing Needs Assessment, 2015, https://oklahomahousingneeds.org/wp-content/uploads/2015/12/Executive-Summary.pdf.

Oklahoma's population has grown by 6% from 2010 to 2020.

Note: "Our Changing Population: Oklahoma," USAFacts, July 2022, https://usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/oklahoma/.

An additional study conducted in 2021 by the Oklahoma Housing Finance Agency and the University of Oklahoma found that over 26% of Oklahomans are paying more than 30% of their income toward housing costs.

Note: Oklahoma Housing Finance Agency, "HOME + Shelter: Pathways to Housing Security in Oklahoma," HOME-ARP: The Institute for Quality Communities, 2023, https://iqc.ou.edu/housing/home-arp/#:~:text=Oklahoma%20HOME%2DARP%20Allocation%20Plan,providers%20and%20agencies%20across%20Oklahoma.

This represents a significant portion of the state's population who are overburdened by high housing costs. Figure 5 shows the proportion of individuals in the disaster-impacted areas who spend more than 30% of their income on housing costs. The data is divided by income bracket and shows that the most impoverished Oklahomans are the most likely to spend more than 30% of their income on housing costs.

The disaster struck a predominately rural area, which was projected to need between 1 and 250 new housing units by 2020.

Note: Integra Realty Resources, "Statewide Maps – Oklahoma Housing Needs Assessment," Oklahoma Housing Needs Assessment, 2015, https://oklahomahousingneeds.org/statewide-graphs/.

Due to nationwide housing market trends post-pandemic, it is expected that these areas meet or exceed the projected need for new housing. With production of new homes largely stalled or stopped entirely throughout the pandemic due to lockdowns and supply chain delays, Oklahoma's need for new housing units has only grown. HUD has labeled 36 of Oklahoma's 77 counties as "priority geographies" for the new Pathways to Removing Obstacles to Housing grant program.

Note: U.S. Department of Housing and Urban Development, PRO Housing Priority Geography, July 26, 2023, July 26, 2023, https://hudgis-hud.opendata.arcgis.com/apps/HUD::pro-housing-priority-geography-search/explore.

Housing Cost Burden Across Incomes in the Disaster Impacted Areas.

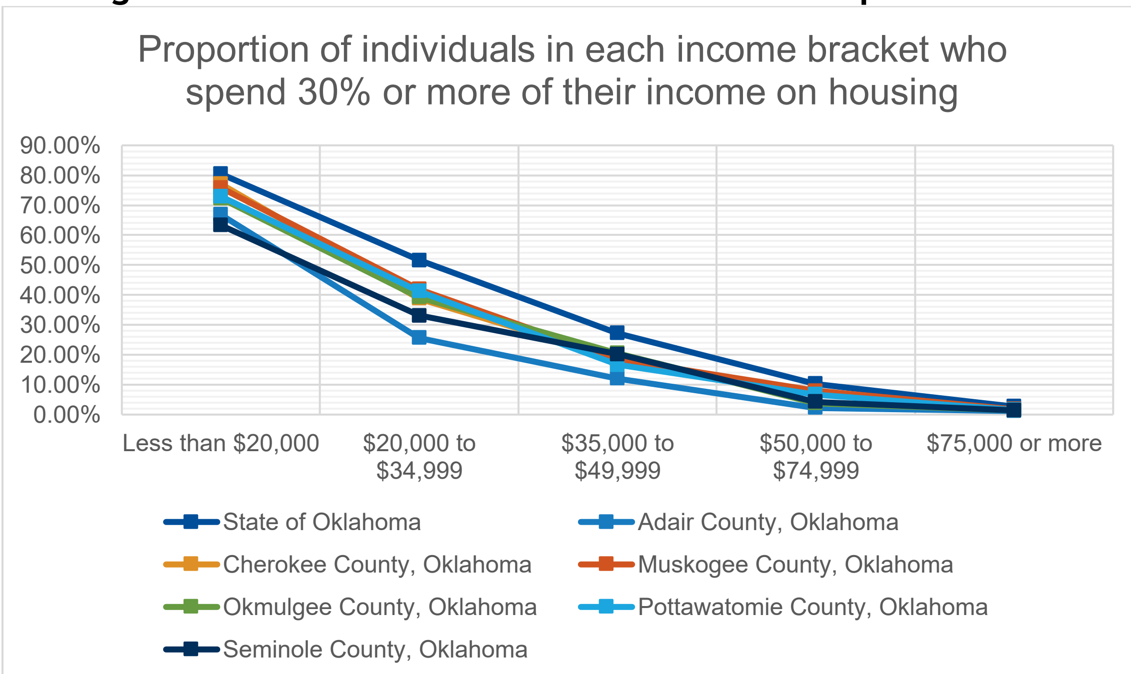

Figure 5

Note: Source: U.S. Census Bureau. American Community Survey S2503, 5-Year Estimates, 2021. data.census.gov.

As seen in Table 3, the disaster-impacted areas have high rates of owner-occupied housing. The 2022 disaster struck a primarily rural and suburban area of Oklahoma. Only Tulsa County falls within an urbanized area, according to census data. In a 2021 report, the perception of rural communities in Oklahoma was that there was a lack of housing, a lack of housing up to code, and available housing was unaffordable.

Note: Oklahoma Housing Finance Agency, "HOME + Shelter: Pathways to Housing Security in Oklahoma," HOME-ARP: The Institute for Quality Communities, 2023, https://iqc.ou.edu/housing/home-arp/#:~:text=Oklahoma%20HOME%2DARP%20Allocation%20Plan,providers%20and%20agencies%20across%20Oklahoma

Owner vs. Renter-Occupied

Geography	Owner-Occupied (%)	Renter Occupied (%)
Oklahoma County	66.06%	33.94%
Adair County	68.04%	31.96%
Cherokee County	67.53%	32.47%
Muskogee County	66.49%	33.51%
Okmulgee County	70.76%	29.24%
Pottawatomie County	70.44%	29.56%
Seminole County	68.44%	31.56%
Tulsa County	59.86%	40.14%
Creek OTSA	64.29%	35.71%

Table 3

Note: Source: U.S. Census Bureau. American Community Survey S2503, 5-Year Estimates, 2021. data.census.gov.

In 2021, ODOC provided grants to communities for COVID recovery using CARES Act funds. These CDBG-CV dollars have primarily gone to help pay rent, mortgage, and utility bills for Oklahomans in rural areas who were impacted by the pandemic and could no longer afford to pay for their housing. This demonstrates a need for housing support in Oklahoma, even in rural areas, where housing costs are typically lower.

Vacancy rates in disaster-impacted areas are like the statewide and national vacancy rates, with homeowner vacancies being much lower than rental vacancy rates. Cherokee County has some of the highest vacancy rates. Pottawatomie County, containing the City of Shawnee, a suburb of Oklahoma City, has very low vacancy rates.

Vacancy Rates

County	Homeowner Vacancy Rate	Rental Vacancy Rate
Adair County	0.7	9.8
Cherokee County	2.3	10.6
Muskogee County	1.8	8.7
Okmulgee County	2.1	7.8
Pottawatomie County	0.9	4
Seminole County	1.6	5.1
Tulsa County	1.5	7.9
Creek OTSA	1.7	8.3

Table 4

Note: Source: U.S. Census Bureau. American Community Survey DP04, 5-Year Estimates, 2021. data.census.gov.

Table 5 shows the median home value, median monthly rent, and the number of building permits issued in the impacted areas, and the State of Oklahoma as a whole. Only Tulsa County and the Muscogee (Creek) Nation (Creek OTSA in the table) have median home values that exceed the State's median home value. Seminole County has a median home value that is nearly half of the statewide median.

Evidence of Cost Burden

Geographic Area Name	Median Home Value	Median Monthly Rent	Building Permits (2022)
State of Oklahoma	$150,800.00	$862.00	13735
Adair County	$94,200.00	$563.00	6
Cherokee County	$132,100.00	$723.00	23
Muskogee County	$113,100.00	$717.00	42
Okmulgee County	$96,400.00	$700.00	9
Pottawatomie County	$129,800.00	$776.00	92
Seminole County	$77,200.00	$669.00	7
Tulsa County	$168,800.00	$929.00	2483
Muscogee Creek OTSA, OK	$163,300.00	$898.00	no data

Table 5

Note: Source: U.S. Census Bureau. American Community Survey DP04, 5-Year Estimates, 2021. data.census.gov. U.S. Census Bureau. Building Permits Survey, 2022. data.census.gov.

Before the 2022 disaster, residents of the impacted areas suffered from pandemic and disaster-related increased housing costs. The impacted area for the 2022 disaster overlaps significantly with the impacted area for Oklahoma's 2019 disaster. In addition, in 2023, severe storms, straight-line winds, and tornadoes (DR-4721 and DR-4706) impacted some of the same counties that were affected by the 2022 disaster. Pottawatomie County was part of the designated area for DR-4706, and Tulsa and Muskogee Counties were impacted by DR-4721.

Data provided to ODOC from the City of Seminole indicates at least 46 homes in the city and surrounding areas still have unmet needs from the 2022 disaster. These residents continue to live in disaster-damaged homes. The city continues to work with the disaster recovery teams to determine estimates for the cost of repairing these homes. In addition, some members of the community are struggling with mental health after the disaster, impacting their ability to access resources and recover.

After the May 2022 disaster struck, FEMA authorized assistance for households under the Individual and Households (IHP) Program. $4,920,992.60 of assistance went to housing, and $553,921.11 was provided for other needs. 878 individual assistance applications were approved. Survivors are likely to have other potential sources of assistance as well. Insurance and charitable donations are the most likely alternative sources of assistance for housing and individuals.

Note: FEMA, DR-4657 Individual Assistance Data, 2022.

Some households may also have qualified for a Small Business Administration loan for their business or home if it was damaged in the disaster. USDA Rural Development provides single-family housing rural disaster home repair grants for low- and very low-income homeowners from the 2022 disaster. This program is only open to applicants in eligible rural areas, reducing the availability of home repair assistance for households in highly impacted urban or suburban areas such as Muskogee, Okmulgee, and Seminole. Consideration of these other sources of assistance when planning for the use of funds can help limit the possibility of duplication between CDBG-DR and other assistance.

Repairing the remaining damaged homes requires as much urgency as possible. The state will use the Urgent Need national objective for the repair of some damaged homes that do not meet the requirements for the LMI national objective. Damaged homes pose an immediate and serious risk to the health and welfare of the occupants and community. Occupied damaged homes can lead to negative health impacts associated with mold, DIY repairs, and unsafe or unsanitary housing. Unoccupied or vacant homes can lead to negative health and welfare impacts to that community. Vacant homes can be sites for illegal or illicit activities, and they may not be structurally safe. In addition, the residents impacted by the disaster deserve assistance rapidly so that they can return to a pre-disaster normal. Repairing disaster-damaged homes will help residents recover not just physically and financially, but also emotionally and spiritually. The longer a person must wait for assistance, the more devastating the disaster will be on their lives, regardless of income. Using CDBG-DR funds, owner-occupied disaster-impacted homes (including mobile homes) will be repaired or reconstructed. This program will directly increase available housing, by restoring safe and sanitary housing for many families, thus reducing the demand for other housing from families displaced by the disaster.

Disasters and nationwide trends in home construction have resulted in a shortage of available affordable housing, especially for those households with the lowest incomes. The best resolution to the shortage of housing is the construction of new housing and the rehabilitation of existing housing. For full recovery, housing must be built to be stronger and more resilient to future disasters.

Single Family v. Multi-Family Needs; Owner Occupied v. Tenant.

The average number of owner-occupied units in the disaster-impacted areas is 66.98% (Table 3), and 33.02% are rented units. Most of the housing in the impacted areas is either 1 or 2-family homes, or mobile homes (Table 6). A trend of note is that the percentage of mobile homes in rural areas is much higher than in Tulsa County, a predominately urban county. Tulsa County and the Creek Nation have many more 10+ unit structures than the more rural counties. Thus, the types of housing in the disaster-impacted areas largely follow national trends: the predominant type of housing is owner-occupied, single-family housing. In rural areas, there are more mobile home units, and in urban areas, there are more large multi-family complexes.

As Table 6 and Table 7 demonstrate, the vast majority of disaster impacts (82.15%) occurred in single-family homes or duplexes. 74% of the applicants impacted by the disaster living in a house or duplex were owner-occupants, whereas 25.68% were renters. The large number of single-family or duplex homes impacted by the disaster means that any housing recovery program should be targeted towards single-family homes or duplexes for the most effective and community-oriented program.

While renters make up approximately 30% of impacted disaster survivors, the State has determined that of the remaining $6.3 million in unmet housing needs after the disaster, only $32,473.07 appears to be remaining rental housing needs, representing less than 1% of unmet housing needs.

Note: FEMA, DR-4657 Individual Assistance Data, 2022. SBA, Disaster Loan Data, DR-4657 and, 2022. Oklahoma Housing Finance Agency Richard S. Lillard Emergency Housing Assistance Fund Data, 2022.

FEMA Individual Assistance data shows a remaining unmet rental housing need of approximately $93,027.50 across the impacted area. The FEMA Individual Assistance (IA) data evaluates personal property loss for renters and shows the amount of the FEMA award for replacing that property. In part, this need was met by the Oklahoma Housing Finance Agency (OHFA). The Oklahoma Housing Finance Agency administers a program for disaster survivors that provides survivors up to $1,500 for the payment of one month's rent, rental deposits, utility deposits, and hotel accommodations. The Richard S. Lillard Emergency Housing Assistance Fund was created for disaster survivors, especially renters. This program is specifically designed to help households rapidly find new housing when their homes are uninhabitable due to a disaster. For the May 2022 disaster, OHFA provided $60,599.43 in funds to renters for these eligible expenses. The Lillard Fund, administered by the Oklahoma Housing Finance Agency, specifically addresses the unmet needs of renters after a disaster. The program does not duplicate the purpose of FEMA awards for the replacement of personal property. This fund provided $71,077.58 in assistance for rapid re-housing to survivors of the May 2022 disaster in Oklahoma, and 85% ($60,931.43) of those funds went to renters.

OHFA is also currently addressing the needs of renters in the state through multiple rental housing construction programs. The OHFA is responsible for administering state-wide housing programs, such as HOME funds and LIHTC, in addition to rental assistance programs, such as Section 8. In 2022, OHFA helped 10,000 families in Oklahoma per month, by providing Housing Choice Voucher Rental Assistance. In addition, there are currently 3,126 affordable housing units under construction in the seven impacted counties, according to OHFA data.

Finally, the State of Oklahoma passed legislation in June of 2023 to fund the construction of single-family homes, multi-family homes, and homebuyer assistance, known as the Oklahoma Housing Stability Program. This program provides $215 million for these purposes. The Oklahoma Housing Finance Agency is currently accepting applications for this program. These programs and the small amount of unmet need remaining for those impacted by the disaster who were renters indicate that the state has met much or all of the remaining unmet need for rental housing.

Mobile Homes account for the second highest type of impacted housing. 7.3% of all applicants for assistance lived in mobile home units, 77.25% of those applicants owned and occupied a mobile home, and 22.75% of impacted households living in mobile home units were tenants. Owner-occupied mobile homes are eligible for repair or reconstruction as part of Oklahoma's single-family housing rehabilitation program. Mobile homes are not eligible for repair or reconstruction if the homes are located in the floodplain.

Under the 2022 CDBG-DR allocation to Oklahoma, ODOC will not be providing funds to rental properties or constructing new affordable housing, as described in this Action Plan. Across the income spectrum, communities of color have lower homeownership rates than whites due to historical and ongoing discriminatory lending and disparate access to home financing. Common barriers to homeownership include limited access to capital because of low credit scores and/or credit "invisibility." These barriers disproportionately impact communities of color. Oklahoma's statewide owner-occupied home rate for whites is 70.15% and is 39.75% for the Black or African American population. This 30.4 percentage point difference represents a disproportionate lack of homeownership among minority populations in the state and indicates systemic racial barriers to homeownership.

The State will monitor affordable rental housing needs and will amend this Action Plan in the future if necessary. As part of that monitoring, the state is reaching out with a request to all PHAs and Community Action Agencies to fill out a webform to determine if remaining unmet need exists as a result of the disaster. Once the state receives the webforms, it will re-assess its need for a program designed to address the needs of renters.

If a large number of respondents express an ongoing need to recover from the disaster, the state will consider completing a substantial amendment to its Action Plan to create a rental rehabilitation or new affordable rental construction housing program. At that time, the state will also consider any waivers it may need to combine CDBG-DR with other state or federal housing programs to make certain CDBG-DR funding is utilized in the most efficient manner to allow for the maximum number of units to be rehabilitated or constructed. ODOC will also consider utilizing any future CDBG-DR funding received for affordable rental housing programs. Currently, the existing $7.43 million allocation is not large enough to address all of the unmet disaster and mitigation needs identified in the plan. If assistance were to be provided to rental housing, ODOC will use HOME program rents to determine affordable rents where applicable and in accordance with the alternative requirements described in the Consolidated Notice (88 Fed. Reg. 32062).

Percent Housing Type in Disaster Impacted Areas

Geographic Area Name	Single-Family/Duplex	Structure with 3-9 units	Structure with 10+ units	Mobile Homes	Boat, RV, van, etc.
Oklahoma	77.00%	6.40%	7.60%	8.80%	0.20%
Adair County	73.10%	3.90%	1.00%	21.90%	0.10%
Cherokee County	68.20%	6.10%	4.80%	20.90%	0.00%
Muskogee County	77.40%	4.20%	7.00%	11.20%	0.20%
Okmulgee County	78.90%	3.60%	2.30%	14.70%	0.30%
Pottawatomie County	79.80%	4.90%	2.80%	12.40%	0.20%
Seminole County	78.20%	3.10%	1.90%	16.40%	0.30%
Tulsa County	73.30%	9.00%	15.40%	2.30%	0.10%
Creek OTSA	73.50%	7.60%	12.70%	6.10%	0.20%

Table 6

Note: Source: U.S. Census Bureau. American Community Survey DP04, 5-Year Estimates, 2021. data.census.gov.

Application for FEMA Assistance by Housing Type

Residence Type	Applicants	Owner-Occupied	% Owner-Occupied	Tenants	% Tenants	Unknown	% Applicants Living in Type
Apartment	117	0	0.00%	117	100.00%	0	4.52%
Assisted Living Facility	2	0	0.00%	2	100.00%	0	0.08%
Boat	3	1	33.33%	2	66.67%	0	0.12%
College Dorm	1	0	0.00%	1	100.00%	0	0.04%
Condo	12	6	50.00%	6	50.00%	0	0.46%
House/Duplex	2126	1580	74.32%	546	25.68%	0	82.15%
Military Housing	1	1	100.00%	0	0.00%	0	0.04%
Mobile Home	189	146	77.25%	43	22.75%	0	7.30%
Other	92	60	65.22%	31	33.70%	1	3.55%
Townhouse	22	8	36.36%	14	63.64%	0	0.85%
Travel Trailer	23	17	73.91%	6	26.09%	0	0.89%
Grand Total	2588	1819	70.29%	768	29.68%	1	99.97%

Table 7

Note: Source: FEMA, DR-4657 Individual Assistance Data, 2022.

FEMA Individual Assistance Owner-Occupied Units

The following tables provide information related to FEMA IA for owner-occupied units and tenant-occupied housing units for the DR-4657 disaster-eligible areas. The Creek Nation is not included, as the DR-4670 disaster was for public assistance only, therefore there is no IA data related to that disaster. The number of applications and unit inspections including those with damage is included. The number of households receiving assistance and the amount of FEMA-verified loss is also outlined in the tables.

Owner-Occupied Unit Applications, DR-4657

County	Applicants	Inspections	Inspected With Damage	Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Adair	115	80	52	43	$172,731.32	$1,502.01
Cherokee	76	49	23	23	$106,278.36	$1,398.40
Muskogee	354	299	190	182	$971,647.24	$2,744.77
Okmulgee	391	324	238	221	$1,454,281.57	$3,719.39
Pottawatomie	74	54	22	21	$43,837.08	$592.39
Seminole	410	287	204	190	$1,229,039.34	$2,997.66
Tulsa	399	305	40	32	$183,766.93	$460.57

Table 8

Note: Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Table 8 shows the number of owner-occupied unit applications and the total FEMA-verified loss. Seminole County has the highest number of applicants, and the second-highest total and average FEMA verified loss. This is especially concerning given the low median value of housing in Seminole County, as seen in Table 5. Okmulgee County has the highest number of properties inspected with damage.

Owner-Occupied Units Real Property Damage, DR-4657

County	Minor-Low	Minor-High	Major-Low	Major-High	Severe	Total
Adair County	97	5	12	1	0	115
Cherokee County	64	5	6	1	0	76
Muskogee County	253	27	63	11	0	354
Okmulgee County	252	67	50	20	2	391
Pottawatomie County	70	3	1	0	0	74
Seminole County	307	60	25	14	4	410
Tulsa County	378	5	16	0	0	399

Table 9

Note: Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Owner-Occupied Units Real Property Damage, DR-4657

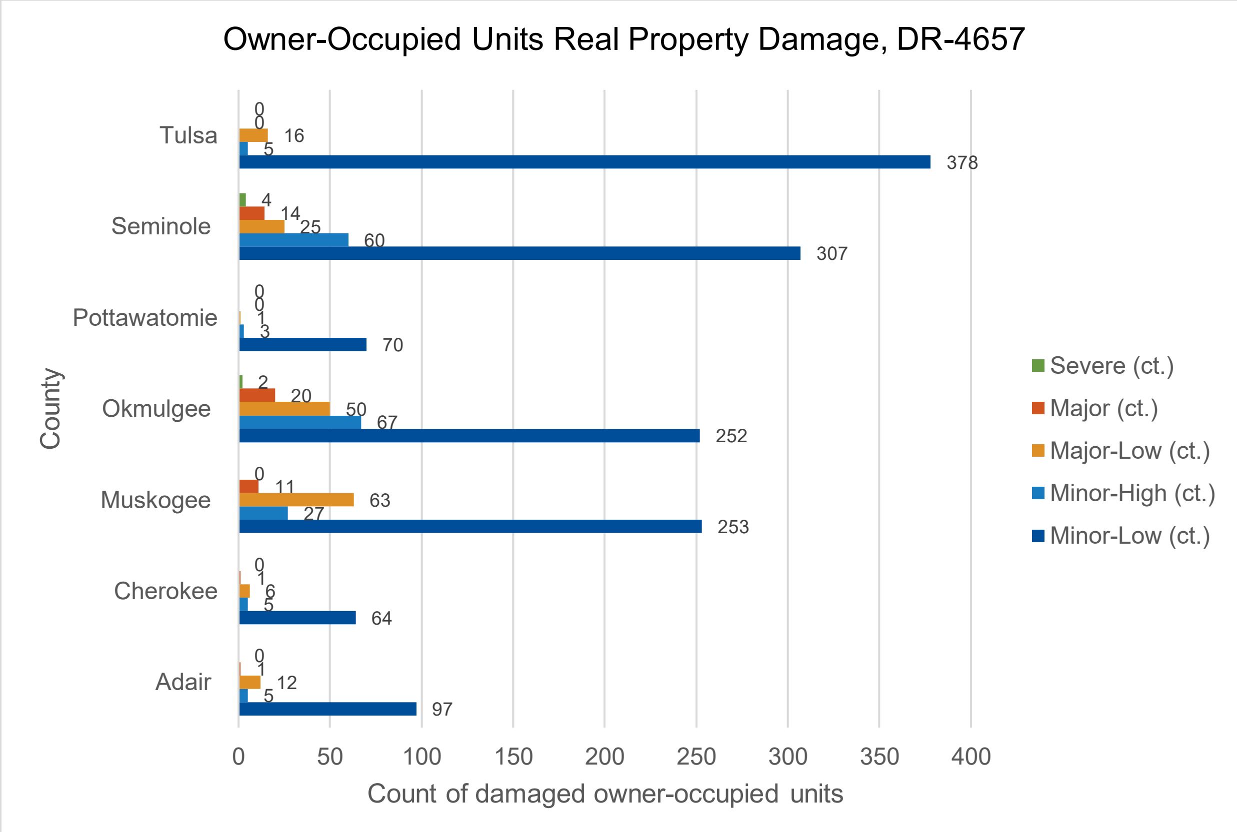

Figure 6

Note: Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Okmulgee County, a HUD-designated MID, contains the most properties with “major-high” real property damage (Table 9). Seminole County and Tulsa County have the most properties with “minor-low” damage. Seminole County has the highest number of properties with “severe” damage, at 4, and the greatest number of applicants, 410. 204 of Seminole’s 410 applicants were inspected with damage (Table 8).

FEMA IA Tenant Applications

FEMA does not inspect rental units for real property damage so personal property damage from the Individuals and Households Program (IHP) reports is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D and are set by HUD. Table 10 and Table 11 provide information on damage to personal property (furniture, belongings, etc.) in tenant-occupied homes, as reported by FEMA.

Tenant Applications, DR-4657

County	Applicants	Inspections	Inspected with Damage	Total FEMA Verified Loss	Average FEMA Verified Loss
Adair	20	15	2	$2,786.26	$139.31
Cherokee	28	25	6	$11,433.54	$408.34
Muskogee	103	86	20	$81,843.63	$794.60
Okmulgee	93	79	27	$76,022.24	$817.44
Pottawatomie	42	29	4	$4,358.98	$103.79
Seminole	154	131	47	$55,488.11	$360.31
Tulsa	328	253	8	$38,822.46	$118.36

Table 10

Note: Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Muskogee, Okmulgee, and Seminole County have the highest FEMA Verified Loss for rental units. Seminole County has the highest number of units inspected with damage.

Tenant Personal Property Damage, DR-4657

County	Minor Low	Minor High	Major Low	major High	Severe	Total
Adair County	19	1	0	0	0	20
Cherokee County	24	2	2	1	0	29
Muskogee County	83	6	3	9	2	103
Okmulgee County	75	6	4	6	2	93
Pottawatomie County	40	2	0	0	0	42
Seminole County	132	15	4	3	0	154
Tulsa County	321	3	1	2	1	328
Grand Total	694	35	14	21	5	769

Table 11

Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Muskogee, Okmulgee, and Tulsa County appear to have experienced significant impacts on tenants from the disaster. All three counties are the only counties with severe damage to personal property experienced by tenants (Table 11).

Public Housing and Affordable Housing

The following sections provide tables for documenting damages to HUD-assisted multi-family housing and public housing. ODOC reached out to local governments and twelve local public housing authorities (PHAs) on July 13, 2023, and August 24, 2023, and received no reports of damage from the disaster to date. ODOC will update the tables if new data becomes available.

In a 2021 report, the perception of rural communities in Oklahoma was that there was a lack of housing, a lack of housing up to code, and available housing was unaffordable.

Note: Oklahoma Housing Finance Agency, "HOME + Shelter: Pathways to Housing Security in Oklahoma," HOME-ARP: The Institute for Quality Communities, 2023, *https://iqc.ou.edu/housing/home-arp/#:~:text=Oklahoma%20HOME%2DARP%20Allocation%20Plan,providers%20and%20agencies%20across%20Oklahoma*

Disasters and nationwide trends in home construction have resulted in a shortage of available affordable housing, especially for those households with the lowest incomes.

Existing programs across the state are addressing the affordable rental housing needs of LMI individuals. OHFA is responsible for administering state-wide housing programs, such as HOME funds and LIHTC, in addition to rental assistance programs, such as Section 8. OHFA also funds a program specifically for disaster recovery, that provides $1,500.00 to survivors after a presidential disaster declaration. These funds can be used for interim housing needs after the disaster. This program provided $71,077.58 to survivors of the May 2022 disaster for rapid re-housing when homes were made uninhabitable by the disaster. OHFA currently administers affordable housing funds for over 3,000 new affordable housing units under construction in the disaster-impacted counties.

ODOC administers the Emergency Solutions Grant (ESG) program for rapid re-housing or homelessness prevention. The State of Oklahoma passed legislation in June of 2023 to fund the construction of single-family homes, multi-family homes, and homebuyer assistance, known as the Oklahoma Housing Stability Program. This program provides $215,000,000.00 million for these purposes. The OHFA is currently accepting applications for this program. These programs, in addition to CDBG-DR funds for housing rehabilitation, are improving housing in Oklahoma.

The best resolution to the shortage of housing is the construction of new housing and the rehabilitation of existing housing. For full recovery, housing must be built to be stronger and more resilient to future disasters.

There are approximately 62 HUD-assisted multi-family properties in the disaster-impacted areas. To date, there have been no reports of damage to these properties because of the disaster.

There are 12 Public Housing Authorities within the disaster-impacted areas. In addition, the Muscogee Creek Nation has a Department of Housing that operates and constructs affordable housing. All 12 PHAs were contacted on August 24th, 2023. In addition, in a meeting with representatives of the Muscogee Nation, no additional public housing repairs or damages were reported. If additional data becomes available, ODOC will update the table.

Multifamily Assisted Housing

Multifamily Assisted Housing

Type Of Damage	# Of Properties	# Of Units	# Of Units Assisted	# Of Units Waiting Assistance	Remaining Unmet Need
No damage reported	N/A	N/A	N/A	N/A	N/A

Table 12

Note: Source: ODOC Outreach. FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.

Public Housing Authorities Damaged

Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHAs Damaged	# Of Units Damaged	Remaining Unmet Need
Adair	N/A	N/A	N/A	N/A
Cherokee	N/A	N/A	N/A	N/A
Muskogee	3	N/A	N/A	N/A
Okmulgee	2	N/A	N/A	N/A
Pottawatomie	2	N/A	N/A	N/A
Seminole	4	N/A	N/A	N/A
Tulsa	1	N/A	N/A	N/A
Muscogee (Creek) Nation	1	N/A	N/A	N/A

Table 13

Note: Source: Oklahoma Public Housing Authorities

Fair Housing, Civil Rights Data, and Advancing Equity

Oklahoma is committed to using data, performance metrics, and quantitative data to ensure programs advance equity and reduce barriers. This section describes the policies and regulations Oklahoma will follow relating to fair housing, civil rights, and equity, and describes how programs will impact traditionally underserved communities and advance equity. The section includes relevant data and analysis surrounding race, disability, social vulnerability, protected classes, environmental hazards, and limited English proficiency.

ODOC is required to use its CDBG-DR funds in a manner that complies with its fair housing and nondiscrimination obligations, including Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., the Fair Housing Act, 42 U.S.C. § 3601-19, section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131 et seq., and section 109 of the HCDA, 42 U.S.C. § 5309. To comply with these requirements, ODOC must assess whether its planned use of funds will have an unjustified discriminatory effect on or failure to benefit racial and ethnic minorities in proportion to their communities' needs, particularly in racially and ethnically concentrated areas of poverty, and how it will address the recovery needs of impacted individuals with disabilities. The data for this assessment is included below. ODOC's planned 2022 CDBG-DR programs will not have an unjustified effect, nor will they fail to benefit racial and ethnic minority communities, especially those in concentrated areas of poverty.

Oklahoma's planned use of CDBG-DR funds will advance equity, promote housing for vulnerable populations, and benefit households in areas of concentrated poverty. Low-income residents impacted by the disaster will have the ability to completely repair damaged homes and will build homes back to a higher standard than before. The repaired homes will be more resilient to future disasters and will be more valuable, thereby increasing wealth for members of the community. As part of ODOC's housing rehabilitation program, ADA accessibility upgrades or additions will be funded, thus increasing the availability of integrated, accessible housing and supportive services. Often, after the disaster, those with access to resources repair their homes and move on from the impacts of the disaster as quickly as possible. CDBG-DR funds frequently are only available to a community one to three years after the initial impacts of the disaster. Those households still needing assistance that far from the date of the disaster are often the most under-resourced and vulnerable. ODOC's 2022 CDBG-DR allocation will benefit these populations, which include the elderly, those with access and functional needs, and low-income families with children. The program will prioritize low-income households first. Remaining funds may be used towards non-LMI households with an urgent need.

In addition, the State will spend 80% of funds in the HUD MIDs, which encompasses the Muscogee (Creek) Nation, which includes Okmulgee County, a tribal population typically underserved by disaster recovery funds.

Note: Allison Herrera, "Trying to Get Disaster Aid? It's Harder for Indigenous People," Center for Public Integrity, November 6, 2019, https://publicintegrity.org/environment/one-disaster-away/when-disaster-strikes-indigenous-communities-receive-unequal-recovery-aid/.

This investment in infrastructure in the Muscogee Nation can begin to address prior disinvestment in infrastructure in this area, which is highly impoverished and disadvantaged. Eighty percent of funds for homeowner rehabilitation and repair will also be dedicated to the Muscogee (Creek) Nation's tribal lands, which includes the second HUD MID – Okmulgee County. The current program design will not fail to benefit this community.

Across the income spectrum, communities of color have lower homeownership rates than whites due to historical and ongoing discriminatory lending and disparate access to home financing. Common barriers to homeownership include limited access to capital because of low credit scores and/or credit "invisibility." These barriers disproportionately impact communities of color. Oklahoma's statewide owner-occupied home rate for whites is 70.15% and is 39.75% for the Black or African American population. This 30.4 percentage point difference represents a disproportionate lack of homeownership among minority populations in the state and can indicate systemic racial barriers to homeownership.

Market rate rental housing is often owned and operated by households or corporations with insurance and access to loans and other resources for repairing damage to homes after a disaster. The owners of these properties would likely not qualify as LMI households. When a rental home is damaged after a disaster, a tenant often must wait for the landlord to repair the home or find alternative housing. For this reason, disaster-impacted renters can be extremely challenging to locate multiple years after a disaster. In addition, many of their needs for interim rental assistance and/or replacement personal property are met by FEMA and Oklahoma Housing Finance Agency disaster programs.

To address the potential for discriminatory impact, due to a lack of programs for renters, the State will monitor affordable rental housing needs and will amend this Action Plan in the future if necessary. As part of that monitoring, the state is reaching out with a request to all PHAs and Community Action Agencies to fill out a webform to determine if remaining unmet need for rental housing exists as a result of the disaster. Once the state receives the webforms, it will re-assess its need for a program designed to address the needs of renters. If a large number of respondents express an ongoing need to recover from the disaster, the state will consider completing a substantial amendment to its Action Plan to create a rental rehabilitation or new affordable rental construction housing program. At that time, the state will also consider any waivers it may need to combine CDBG-DR with other state or federal housing programs to make certain CDBG-DR funding is utilized in the most efficient manner to allow for the maximum number of units to be rehabilitated or constructed.

In addition, ODOC will conduct or require subrecipients to conduct outreach for housing programs in a manner that targets racial and ethnic minority communities, to ensure their participation if eligible. It will also consider utilizing any future CDBG-DR funding received for affordable rental housing programs. Currently, the existing $7,430,000.00 million allocation is not large enough to address all the unmet disaster and mitigation needs identified in the plan, nor is it large enough to support the capacity required to implement affordable rental housing programs.

Percent of Owner-Occupied Units by Race/Ethnicity in the Disaster Impacted Area

Race or Ethnicity	Oklahoma	Adair County	Cherokee County	Muskogee County	Okmulgee County	Pottawatomie County	Seminole County	Tulsa County	Creek OTSA
White	70.15%	68.05%	71.16%	70.07%	73.93%	73.83%	75.14%	65.06%	68.56%
Black or African American	39.75%	35.00%	36.36%	51.64%	58.94%	31.44%	46.88%	34.03%	32.88%
American Indian and Alaska Native	63.30%	67.63%	62.97%	68.85%	61.55%	58.17%	50.49%	59.32%	64.57%
Asian	60.77%	97.33%	60.00%	65.00%	84.09%	55.65%	60.00%	59.36%	61.85%
Native Hawaiian and Other Pacific Islander	25.99%	0.00%	22.22%	0.00%	0.00%	0.00%	0.00%	9.92%	8.72%
Some other race	56.89%	59.03%	49.76%	55.28%	75.00%	49.70%	83.93%	55.02%	57.48%
Two or more races	58.00%	76.09%	60.05%	61.97%	66.87%	58.23%	66.19%	50.31%	54.58%
Hispanic or Latino origin	53.75%	69.23%	57.95%	59.26%	53.76%	52.51%	68.22%	50.21%	51.84%
White alone, not Hispanic or Latino	71.07%	67.82%	71.45%	70.28%	74.49%	74.31%	75.53%	66.11%	69.50%

Table 14

Note: Source: U.S. Census Bureau. American Community Survey S2502, 5-Year Estimates, 2022. data.census.gov.

While ODOC is not directly funding programs with CDBG-DR funds that address transitional housing, homelessness prevention, or special needs populations, ODOC is an active and committed member of the Oklahoma Housing Task Force, which coordinates housing resources before and after a disaster for survivors. By leveraging existing partnerships, ODOC can connect survivors with resources that prevent or address homelessness; provide transitional, emergency, or permanent supportive housing; meet the needs of persons with access and functional needs; support and provide resources for victims of domestic violence, persons with alcohol or other substance-use disorders, persons with HIV/AIDS and their families, and public housing residents.

ODOC understands disaster survivors are frequently fatigued from navigating multiple complex disaster recovery bureaucracies. ODOC is committed to maintaining transparency and working actively with survivors to guide them through programs. ODOC will ensure access for those with limited English proficiency through translation and interpretation services offered as described in the state's language access plan.

Note: https://www.okcommerce.gov/wp-content/uploads/Citizen-Participation-Plan-2024-Draft.pdf

ODOC provides critical disaster-related information in accessible formats, such as tagged PDFs. ODOC plans to work with Disaster Case Managers to help subrecipients design and implement programs that meet survivors where they are. ODOC also intends to work with Disaster Case Management when beneficiaries are applying for CDBG-DR programs. These case managers guide survivors on their road to recovery and help them access disaster recovery resources.

Public services such as disaster case management are necessary to complement the housing rehabilitation activities as planned. This service will help survivors navigate the complex disaster recovery system, Disaster victims seeking help often encounter complex eligibility requirements and application processes. For many, the terms “eligibility criteria,” “duplication of benefits,” “AMI,” “LMI,” and “environmental review” are foreign concepts, and the documentation required to comply with these requirements is often not readily available. Disaster case managers can advocate for survivors and ensure that they are able to get the help they need. Currently, other public services are not necessary for the program. The State will monitor the housing program and determine if additional services are necessary, especially those surrounding legal aid. If services are required, they will be added via a substantial amendment to this Action Plan. All provided public services will be accessible to those with disabilities. The state will employ translation and interpretation services as needed, and will provide accommodations for survivors with mobility, sensory, developmental, emotional, cognitive, and other impairments as needed.

Often, the most vulnerable populations are the most heavily impacted by a disaster, and the least able to easily access resources. While LMI populations often intersect with protected class groups, ODOC cannot assume that LMI-targeted activities will ensure that racial and ethnic communities benefit in proportion to their needs. The state has conducted this analysis to show that while all unmet needs from the disaster may not be met, the agency is doing what it can to help the most impoverished and vulnerable disaster survivors. ODOC is committed to providing accommodations and conducting outreach to communities on an ongoing basis to ensure that the needs of minorities, protected classes, and historically underserved populations are met to the extent possible, given capacity and funding limitations. The programs will not have an unjustified discriminatory effect on or fail to benefit protected classes. Regulatory and funding challenges associated with CDBG-DR limit the state’s ability to eliminate all barriers to access and to fully fund the needs of all impacted survivors. However, ODOC is committed to designing programs that are accessible, effective, and meet the statutory requirements of CDBG-DR.

Race by County and OTSA

Geography	Label	Total population	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some other race
Oklahoma	Estimate	3,948,136	2,752,553	284,536	303,792	88,601	6,760	118,507
	Percent	100.00 %	69.72%	7.21%	7.69%	2.24%	0.17%	3.00%
Adair County	Estimate	19,839	7,862	83	8,706	215	12	774
	Percent	100.00%	39.63%	0.42%	43.88%	1.08%	0.06%	3.90%
Cherokee County	Estimate	47,307	22,938	577	16,047	452	25	788
	Percent	100.00%	48.49%	1.22%	33.92%	0.96%	0.05%	1.67%
Muskogee County	Estimate	66,881	37,376	6,795	12,415	425	6	2,606
	Percent	100.00%	55.88%	10.16%	18.56%	0.64%	0.01%	3.90%
Okmulgee County	Estimate	37,046	23,540	2,813	5,724	186	19	235
	Percent	100.00%	63.54%	7.59%	15.45%	0.50%	0.05%	0.63%
Pottawatomie County	Estimate	72,331	53,351	2,256	10,198	529	76	439
	Percent	100.00%	73.76%	3.12%	14.10%	0.73%	0.11%	0.61%
Seminole County	Estimate	23,798	15,691	1,066	4,884	44	10	140
	Percent	100.00%	65.93%	4.48%	20.52%	0.18%	0.04%	0.59%
Tulsa County	Estimate	664,084	445,871	65,577	35,029	23,575	796	23,004
	Percent	100.00%	67.14%	9.87%	5.27%	3.55%	0.12%	3.46%
Creek OTSA, OK	Estimate	809,447	565,378	56,485	61,900	24,193	553	17,979
	Percent	100.00%	69.85%	6.98%	7.65%	2.99%	0.07%	2.22%

Table 15

Note: Source: U.S. Census Bureau. American Community Survey DP05, 5-Year Estimates, 2021. data.census.gov.

Black and African American Population, DR-4657 and DR-4670

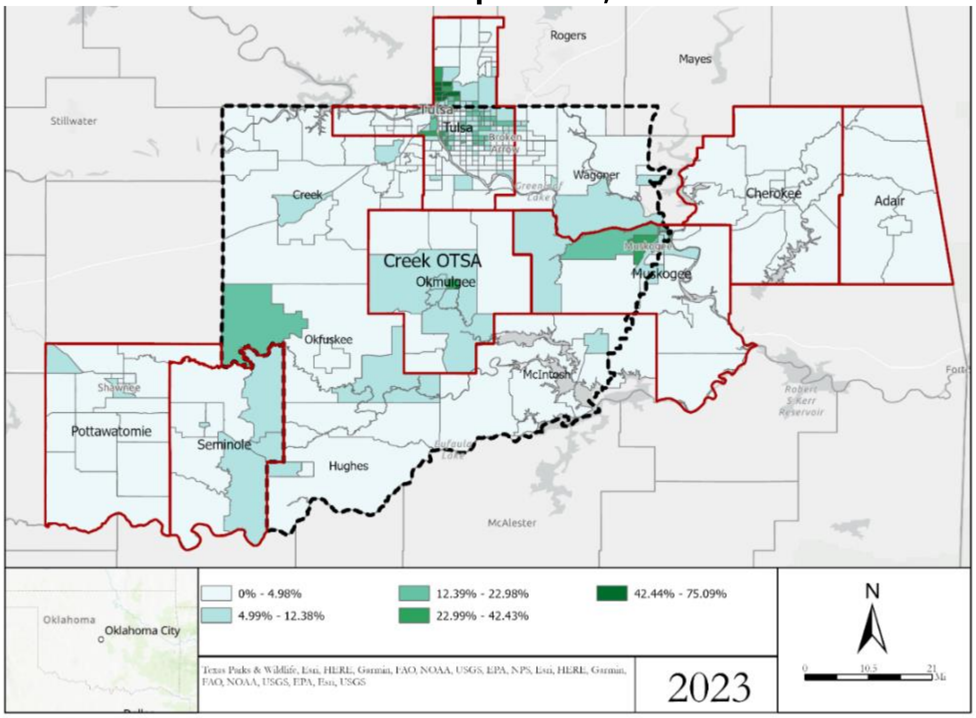

Figure 7

Note: Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Native American Population, DR-4657 and DR-4670

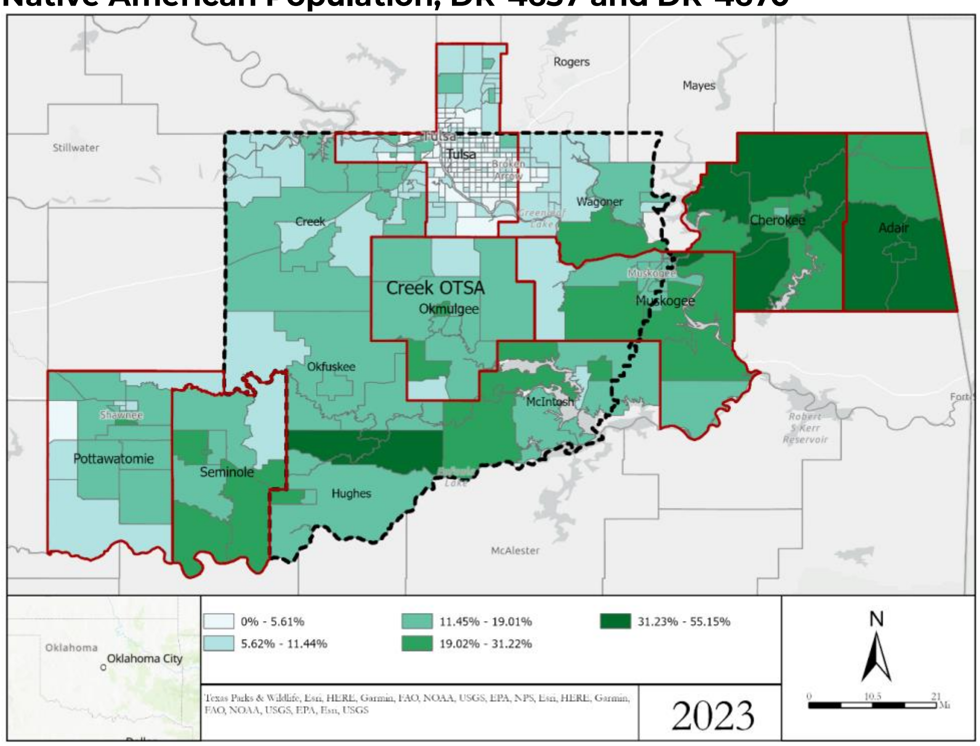

Figure 8

Note: Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Asian Population, DR-4657 and DR-4670

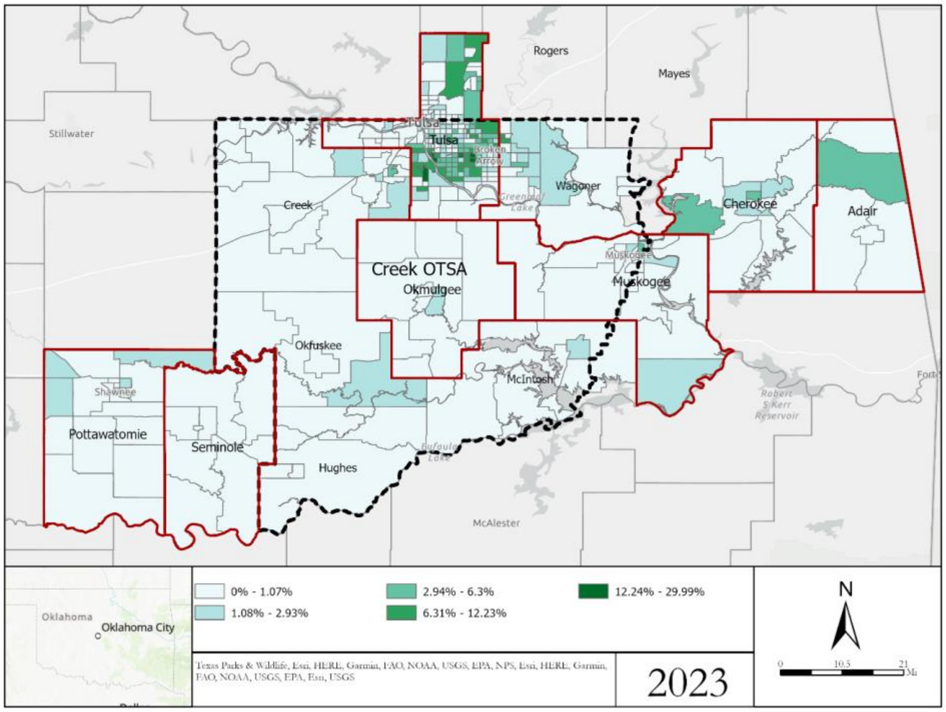

Figure 9

Note: Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Hispanic Population, DR-4657 and DR-4670

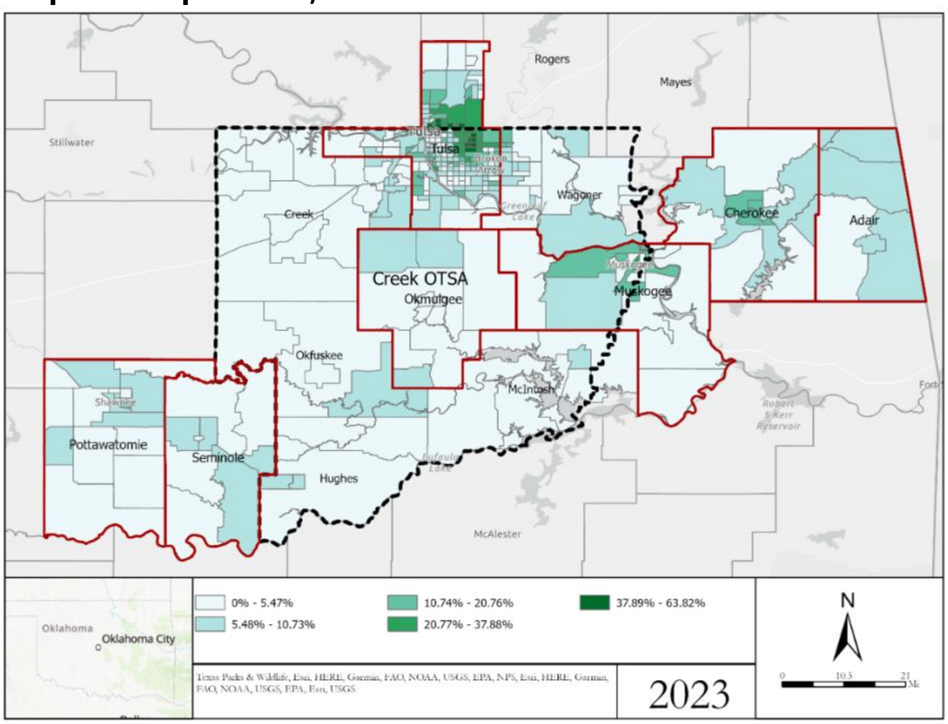

Figure 10

Note: Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Population with a Disability in Impacted Areas

Geographic Area	Total Population	Population with a Disability	Percent with a Disability
Oklahoma	3,869,212	631,051	16.3%
Adair County	19,723	4,114	20.9%
Cherokee County	46,947	9,375	20.0%
Muskogee County	64,226	13,570	21.1%
Okmulgee County	36,413	7,939	21.8%
Pottawatomie County	70,516	12,848	18.2%
Seminole County	23,422	5,611	24.0%
Tulsa County	659,288	88,597	13.4%
Creek OTSA, OK	798,829	115,805	14.5%

Table 16

Note: Source: U.S. Census Bureau, American Community Survey S1810, 5-Year Estimates, 2021, data.census.gov.

National Origin in the Disaster Impacted Areas

Geography	Metric	Place of Birth			Region of Birth of Foreign Born					
		Born in United States	Born in Puerto Rico, U.S. Island areas, or abroad to American parent(s)	Foreign born	Europe	Asia	Africa	Oceania	Latin America	Northern America
Oklahoma County	Estimate	3,682,425	44,040	44,032	17,152	67,760	13,740	3,409	137,155	4,816
	Percent	92.7%	1.1%	6.1%	7.0%	27.8%	5.6%	1.4%	56.2%	2.0%
Adair County	Estimate	19,192	71	463	39	115	11	4	291	3
	Percent	97.3%	0.4%	2.3%	8.4%	24.8%	2.4%	0.9%	62.9%	0.6%
Cherokee County	Estimate	45,745	268	1,399	75	316	13	10	939	46
	Percent	96.5%	0.6%	3.0%	5.4%	22.6%	0.9%	0.7%	67.1%	3.3%
Muskogee County	Estimate	64,215	541	1,850	43	427	95	5	1,183	97
	Percent	96.4%	0.8%	2.8%	2.3%	23.1%	5.1%	0.3%	63.9%	5.2%
Okmulgee County	Estimate	36,431	70	399	20	159	-	4	206	10
	Percent	98.7%	0.2%	1.1%	5.0%	39.8%	0.0%	1.0%	51.6%	2.5%
Pottawatomie County	Estimate	70,829	540	1,365	218	411	65	54	533	84
	Percent	97.4%	0.7%	1.9%	16.0%	30.1%	4.8%	4.0%	39.0%	6.2%
Seminole County	Estimate	22,966	107	519	61	133	11	10	291	13
	Percent	97.3%	0.5%	2.2%	11.8%	25.6%	2.1%	1.9%	56.1%	2.5%
Tulsa County	Estimate	600,845	7,706	60,372	4,299	17,606	3,343	621	33,559	944
	Percent	89.8%	1.2%	9.0%	7.1%	29.2%	5.5%	1.0%	55.6%	1.6%
Creek OTSA, OK	Estimate	751,873	7,837	58,024	4,788	18,284	3,598	431	29,823	1,100
	Percent	91.9%	1.0%	7.1%	8.3%	31.5%	6.2%	0.7%	51.4%	1.9%

Table 17

Note: Source: U.S. Census Bureau, American Community Survey DP02, 5-Year Estimates, 2022, data.census.gov.

Estimated households with one or more people by age group

Geography	Under 18	Percent	65 and Over	Percent
Oklahoma	483,568	31.8%	455,692	29.9%
Adair County	2,231	32.6%	2,317	33.8%
Cherokee County	5,224	29.0%	6,153	34.2%
Muskogee County	8,272	32.3%	8,409	32.9%
Okmulgee County	4,306	30.8%	5,062	36.2%
Pottawatomie County	8,335	31.5%	8,664	32.8%
Seminole County	2,951	34.6%	3,039	35.6%
Tulsa County	82,440	31.2%	73,167	27.7%
Creek OTSA, OK	99,389	31.1%	95,265	29.8%

Table 18

Note: Source: U.S. Census Bureau, American Community Survey DP02, 5-Year Estimates, 2022, data.census.gov.

Religion in the Disaster Impacted Counties

Religious Tradition	Adair County	Cherokee County	Muskogee County	Okmulgee County	Pottawatomie County	Seminole County	Tulsa County	Grand Total
Black Protestant	0	0	2,812	612	1,004	228	13,886	18,542
Buddhism	0	0	0	0	0	0	97	97
Catholic	100	1,629	1,844	925	2,872	1,178	52,881	61,429
Evangelical Protestant	10,496	13,225	40,027	20,283	36,042	10,100	266,338	396,511
Hinduism	0	0	0	0	0	0	795	795
Islam	0	0	0	0	0	0	5,359	5,359
Jehovah's Witnesses	102	200	560	210	726	204	6,276	8,278
Judaism	0	0	0	0	0	0	2,138	2,138
Latter-day Saints	0	390	536	487	0	244	6,435	8,092
Mainline Protestant	452	2,466	4,232	2,464	3,226	1,652	69,802	84,294
Orthodox	0	0	0	0	0	0	837	837
Other	36	59	78	8	24	48	197	450
Other Christians	0	32	0	0	0	0	3,409	3,441
Grand Total	11,186	18,001	50,089	24,989	43,894	13,654	428,450	590,263

Table 19

Source: U.S. Religion Census, the Association of Religion Data Archives, 2020, https://www.thearda.com/us-religion/census/congregational-membership. Note: "Other" includes Baha'i and Jain religious bodies.

Maps of racially or ethnically concentrated areas of poverty focus on Tulsa, Muskogee, and Adair Counties, as these are the only counties in the disaster-impacted areas with any identified racially and ethnically concentrated areas of poverty. The City of Muskogee is included in the HUD MID area of the

Muscogee (Creek) Nation, but Adair County is not within the Nation. The southern portion of Tulsa County is part of the Creek Nation. The boundary roughly follows Interstate 244 through the city of Tulsa, and two of the ten census tracts that are considered racially or ethnically concentrated areas of poverty in Tulsa County are a part of the Nation, and therefore the HUD MID.

Racially or Ethnically Concentrated Areas of Poverty: Muskogee and Adair Counties

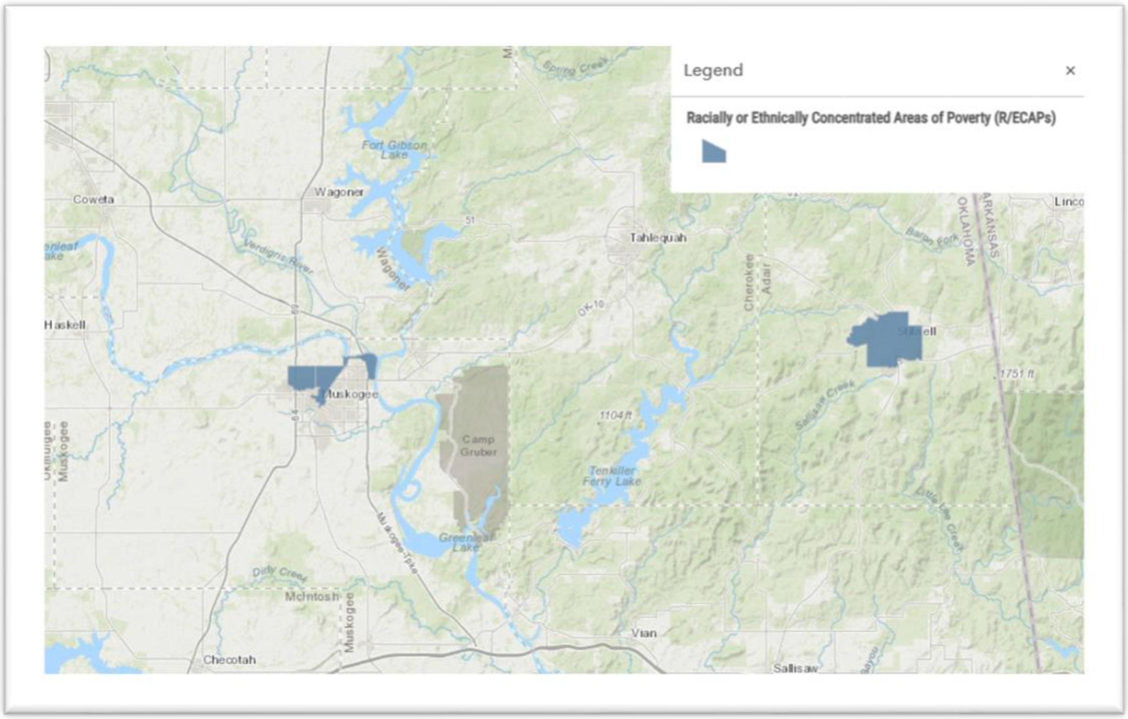

Figure 11

Note: Source: U.S. Department of Housing and Urban Development, "Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)," hudgis-hud.opendata.arcgis.com, August 21, 2023, https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_15/about.

Figure 1: Racially or Ethnically Concentrated Areas of Poverty: Tulsa County

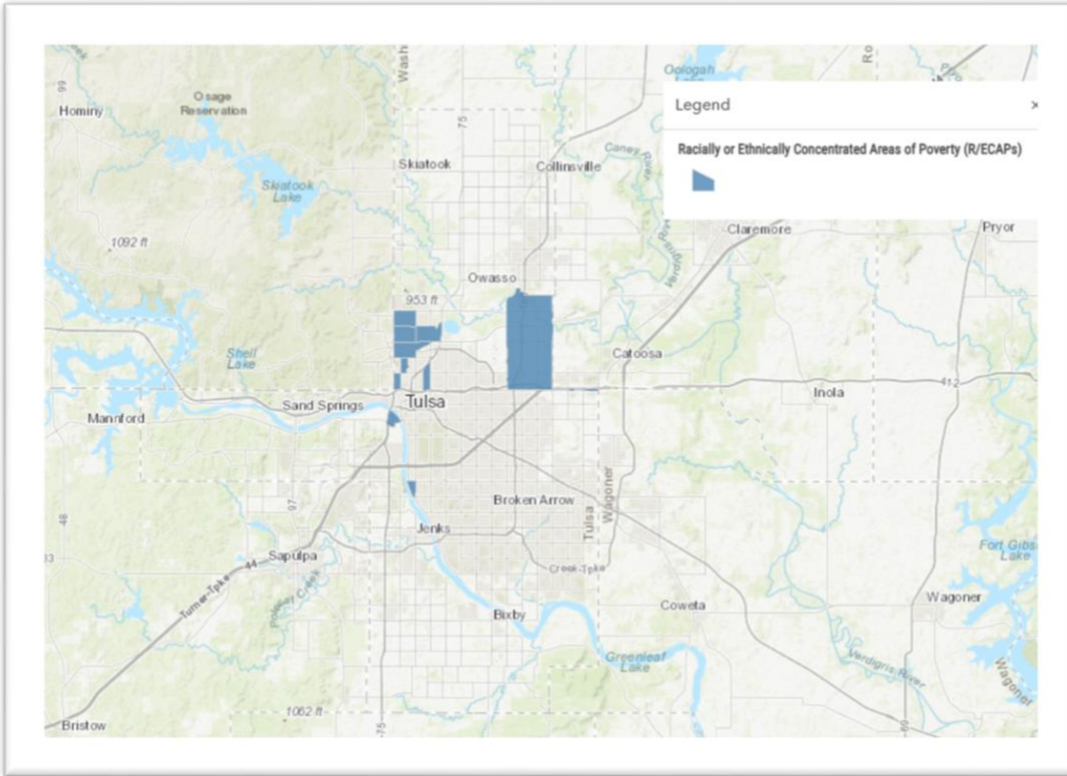

Figure 12

Note: Source: U.S. Department of Housing and Urban Development, "Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)," hudgis-hud.opendata.arcgis.com, August 21, 2023, https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_15/about.

Oklahoma does not have data on sexual orientation and gender identity down to the county and tribal nation level. At the state level, the Williams Institute estimates that 138,000 Oklahoma residents over the age of 13 identify as LGBT+. ODOC does not anticipate the program having negative impacts on LGBT+ individuals and households.

The impacted disaster area includes multiple tribal nations and lands, as seen in Figure 13.

Map of Tribal Lands in Disaster Impacted Areas

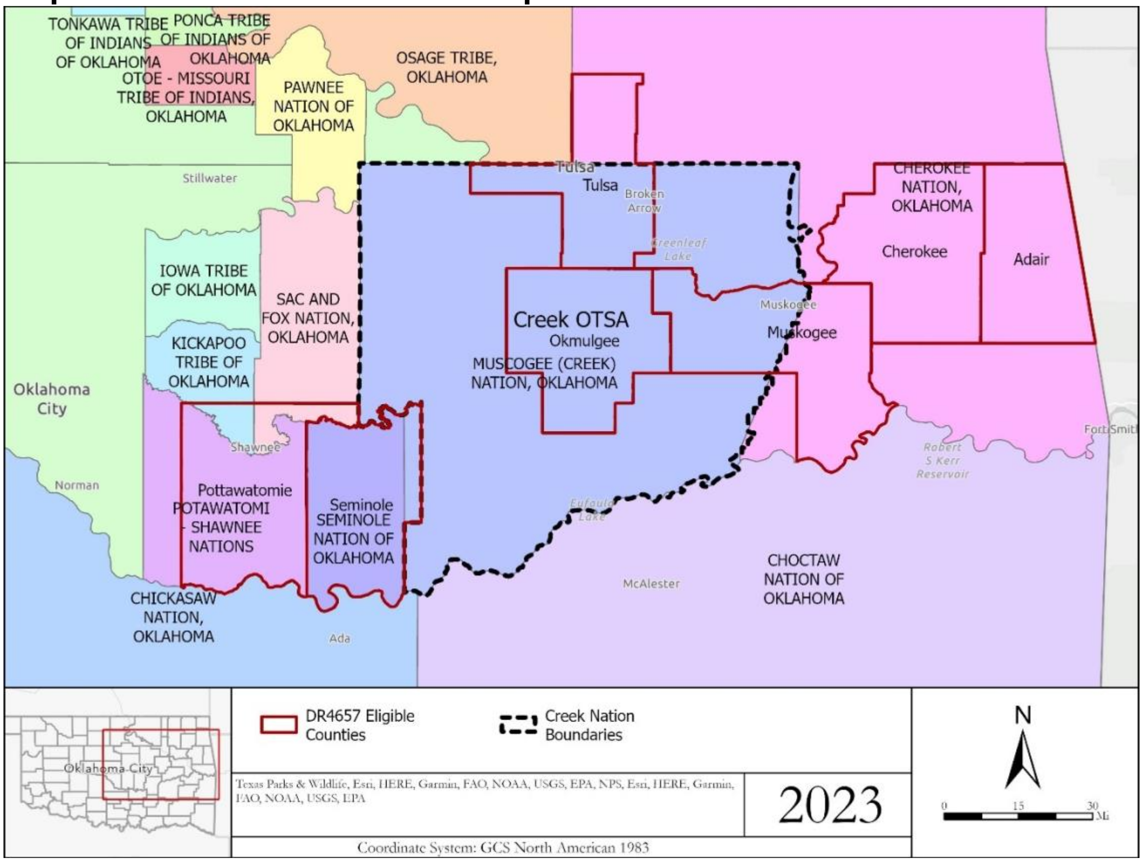

Figure 13

Note: Source: Oklahoma Department of Transportation. Tribal Boundaries. 2015. https://gis-okdot.opendata.arcgis.com/datasets/22acdfb12c8141ee852499cc920fe8d3/explore

A map of EPA superfund sites available through the Department of Environmental Quality shows five superfund sites in the disaster-impacted area (Figure 14). Figure 15: Proximity to Superfund Sites shows the relative proximity of the census tracts in the disaster impacted areas to superfund sites. Okmulgee and Bristow, Oklahoma contain the highest Superfund site proximity percentile when compared with the national percentiles. Tulsa County represents an area in the disaster impacted area with high proximity to hazardous waste (Figure 18). These areas also represent communities with higher concentrations of Black and/or Native American populations. There are 29 Brownfields sites in the disaster- impacted area (Figure 17). ODOC's eligible infrastructure and planning programs can address and mitigate natural and environmental hazards to increase resilience among vulnerable and historically underserved populations.

Superfund Sites in Impacted Area

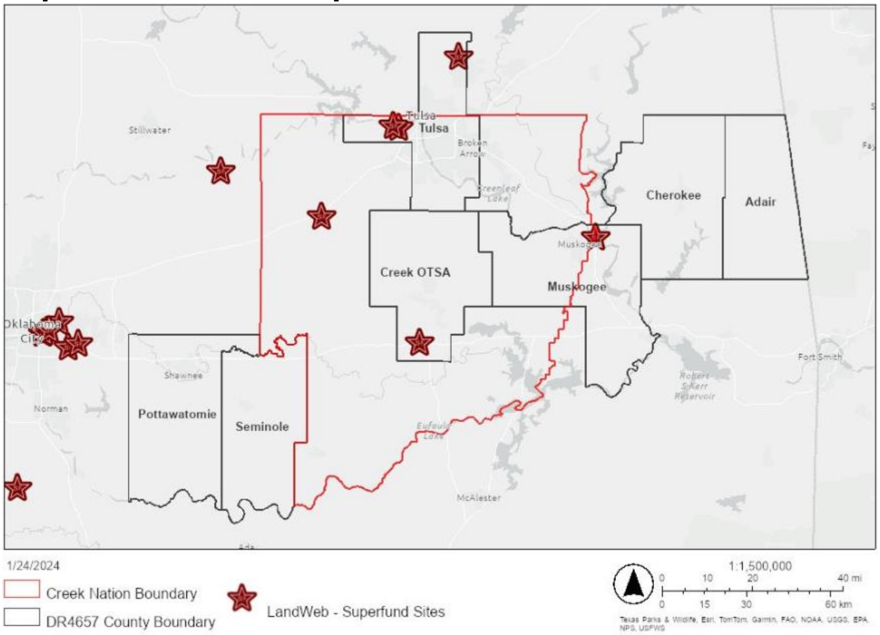

Figure 14

Note: Source: Makenna Paniel, Superfund Sites, Arcgis.com (Oklahoma Department of Environmental Quality, 2022), *[https://www.arcgis.com/home/webmap/viewer.html?webmap=d5c8a1e7c4154aa4ac29fa2c101da511&extent=-103.8282.](https://www.arcgis.com/home/webmap/viewer.html?webmap=d5c8a1e7c4154aa4ac29fa2c101da511&extent=-103.8282)*

Proximity to Superfund Sites

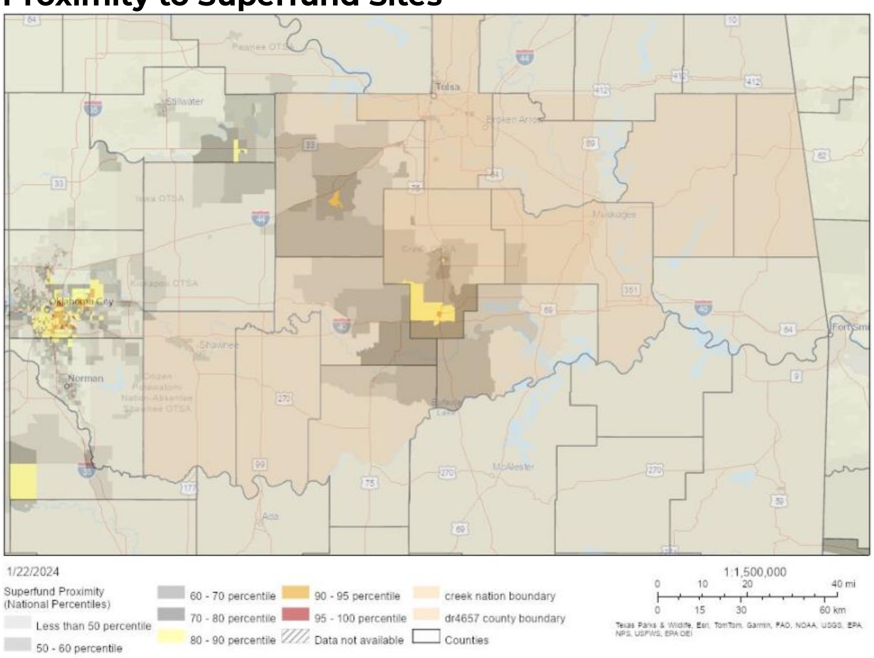

Figure 15

Note: Source: EPA's Environmental Justice Screening and Mapping Tool (Version 2.2). *[https://ejscreen.epa.gov/mapper/.](https://ejscreen.epa.gov/mapper/)*

Waterways in the Disaster-Impacted Areas

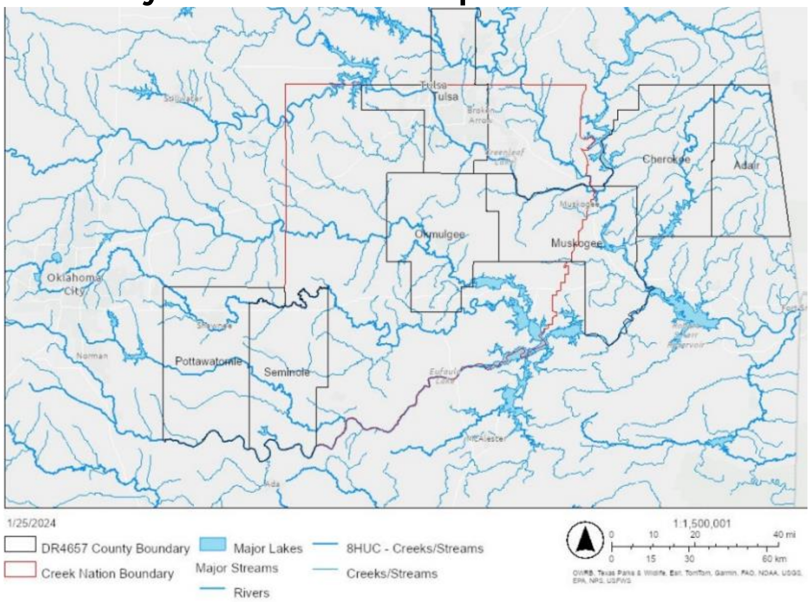

Figure 16

Note: Source: Oklahoma Water Resources Board, Open Data, Oklahoma Lakes, Streams, and Watersheds. https://oklahoma.gov/owrb/data-and-maps/gis-data.html

Brownfields in the Disaster-Impacted Areas

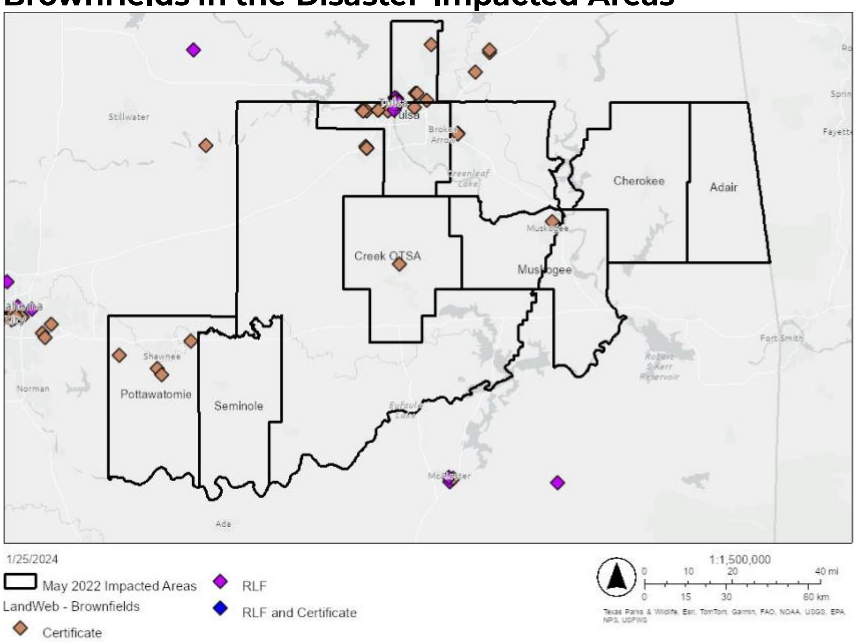

Figure 17

Note: Source: Oklahoma Department of Environmental Quality. Interactive Map of DEQ Brownfield Sites, 2022. https://www.deq.ok.gov/land-protection-division/cleanup-redevelopment/brownfields/. Notes: RLF = Revolving Loan Fund. There are 29 total Brownfield Sites in the Impacted Area.

Proximity to Hazardous Waste

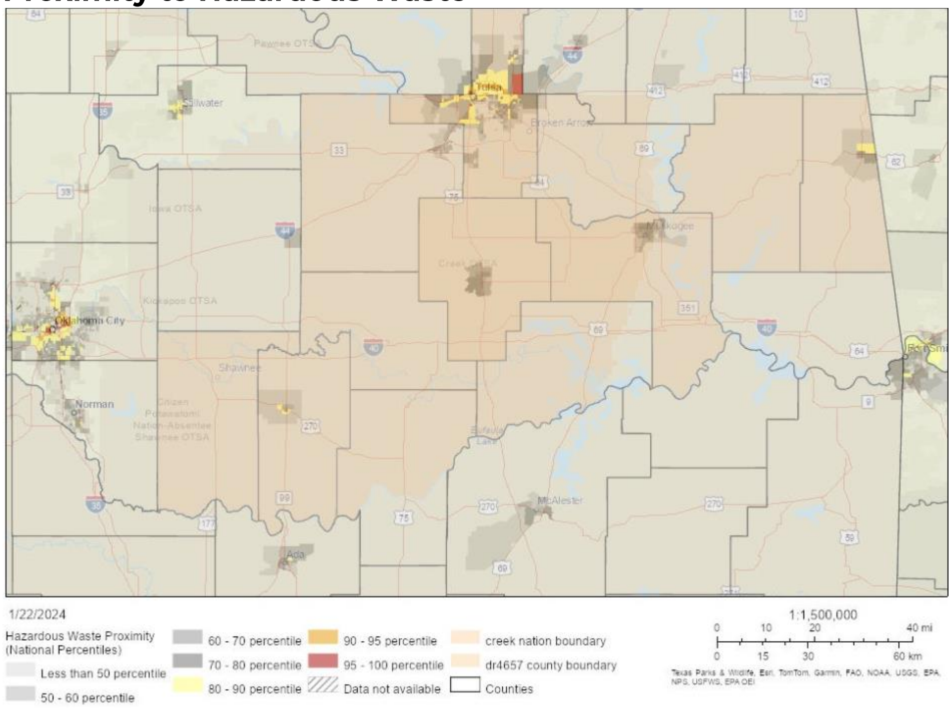

Figure 18

Note: Source: EPA's Environmental Justice Screening and Mapping Tool (Version 2.2). [*https://ejscreen.epa.gov/mapper/*](https://ejscreen.epa.gov/mapper/)

Overall Social Vulnerability Index: Oklahoma

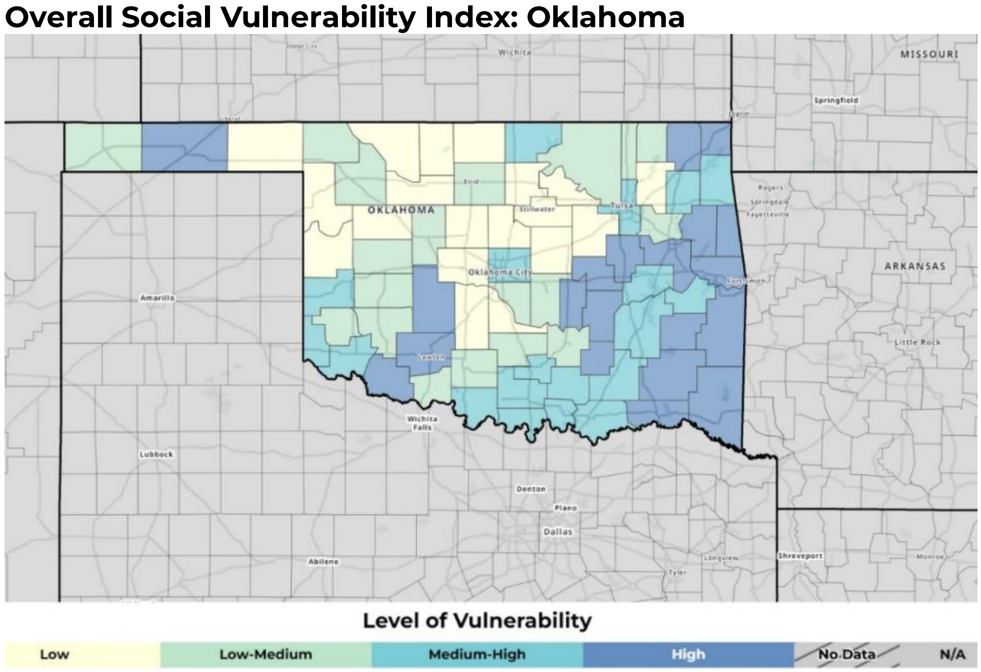

Figure 19

Note: Source: CDC/ATSDR Social Vulnerability Index (SVI) Interactive Map, Atsdrdev.cdc.gov (Agency for Toxic Substances and Disease Registry, November 3, 2022), [*https://www.atsdr.cdc.gov/placeandhealth/svi/interactive_map.html*](https://www.atsdr.cdc.gov/placeandhealth/svi/interactive_map.html)*.*

Of the impacted counties, Seminole, Okmulgee, Cherokee, and Adair Counties rank high on the Social Vulnerability Index (SVI). The SVI, published by the Centers for Disease Control Agency for Toxic Substances and Disease Registry, uses 16 U.S. Census variables to help local officials identify communities that may need support before, during, or after disasters.

Note: Agency for Toxic Substances and Disease Registry, "CDC's Social Vulnerability Index (SVI)," www.atsdr.cdc.gov, October 15, 2020, https://www.atsdr.cdc.gov/placeandhealth/svi/index.html.

Increased social vulnerability means a community may be more susceptible to more negative effects from an external stressor, like a natural disaster.

There do not appear to be major differences in demographics between the state population and disaster declaration and HUD MID areas (Table 20). The impacted disaster areas are generally within +/-1% of the state percentages for each demographic group. The only exception to this is a higher concentration of Native Americans in the disaster declaration area (8.9% in the declaration area versus 7.69% statewide). This is not unexpected, as there is a higher concentration of Native American citizens and Native American tribal nations in the eastern half of Oklahoma.

Limited English Proficiency

ODOC is committed to providing access to all its programs for Limited English proficient speakers. ODOC and its subrecipients will translate vital documents into Spanish for CDBG-DR programs that occur in market areas that exceed 1,000 LEP individuals (to include the upper band of the margin of error) or 5% LEP in that language group. The cost incurred by the State or its subrecipients to translate vital documents into Spanish is both reasonable and necessary. For the 2022 CDBG-DR program, activities occurring in Tulsa County will require the translation of vital documents into Spanish.

Upon request, ODOC and its subrecipients will translate vital documents into Vietnamese. The cost incurred by the State or its subrecipients to translate vital documents larger than 2 pages into Vietnamese is neither reasonable nor necessary. Therefore, ODOC and its subrecipients will utilize oral translation and interpretation services, provided through Language Associates, to assist LEP Vietnamese speakers. For the 2022 CDBG-DR program, no activities will require the translation of vital documents into Vietnamese. To encourage participation in the program, activities occurring in Tulsa County should consider some outreach in the Vietnamese language.

Upon request, ODOC and its subrecipients will translate vital documents into Chinese. The cost incurred by the State or its subrecipients to translate vital documents larger than 2 pages into Chinese is neither reasonable nor necessary. Therefore, ODOC and its subrecipients will utilize oral translation and interpretation services, provided through Language Associates, to assist LEP Chinese speakers. For the 2022 CDBG-DR program, no activities will require the translation of vital documents into Chinese. To encourage participation in the program, activities occurring in Tulsa County should consider some outreach in the Chinese language.

For more details about vital documents and the level of language assistance that ODOC and its subrecipients provide to beneficiaries, please refer to the Language Access Plan available on ODOC's disaster recovery website.

Point-in-Time Count

HUD requires an annual count of individuals and families experiencing homelessness. This count, known as the Point-in-Time Count, is completed during the last ten days in January.

The 2022 Point-in-Time count does not capture data during the period of the severe storms, flooding, and tornadoes (May 2-8, 2022) that impacted Oklahoma. Additionally, HUD calls for PIT data at the CoC level by aggregating the data from all relevant providers within the CoC. The State of Oklahoma's CoC network does not have data from the PIT count available at the county level. In addition, the count does not ask about disaster impacts, and the CoC network has not added this question to the PIT count. ODOC will update the PIT data tables if new data becomes available.

The State is currently reaching out to Public Housing Authorities and Community Action Agencies (CAA) and will ask these agencies to report any disaster impacts to persons experiencing homelessness. The State will amend this Action Plan if necessary if a sufficient need for homeless services is identified.

Oklahoma Demographics and Disaster-Impacted Populations

Demographics and Disaster-Impacted Populations

Demographic	State Estimates	State Percentage	Disaster Declaration Estimates	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	3,948,136	100%	1,740,733	100.00%	846,493	100.00%
Under 5 years	252,929	6.41%	116,098	6.67%	55,720	6.58%
65 years and over	615,832	15.60%	267,868	15.39%	134,154	15.85%
Population with a disability	631,051	15.98%	257,859	14.81%	123,744	14.62%
White or Caucasian	2,752,553	69.72%	1,172,007	67.33%	588,918	69.57%
Black or African American	284,536	7.21%	135,652	7.79%	59,298	7.01%
Native American, American Indian, or Alaska Native	303,792	7.69%	154,903	8.90%	67,624	7.99%
Asian	88,601	2.24%	49,619	2.85%	24,379	2.88%
Native Hawaiian and Other Pacific Islander	6,760	0.17%	1,497	0.09%	572	0.07%
Other Race	118,507	3.00%	45,965	2.64%	18,214	2.15%

Table 20

Note: Data source: U.S. Census Bureau, American Community Survey DP03, S1810, B02001, B03001, 5-Year Estimates, 2021, data.census.gov. "MIDs" here includes only the HUD-identified MIDs.

Income Demographics

Income Demographics: Statewide and Disaster-Impacted Areas

Income Demographic	Statewide	Counties Impacted by Disaster (Average)	HUD MID Areas (average)
Median Household Income	$56,956	$49,271	$54,587
Per Capita Income	$30,976	$26,385	$29,998

Table 21

Data source: U.S. Census Bureau, American Community Survey DP03, 5-Year Estimates, 2021, data.census.gov.

Income Demographics by Disaster-Impacted County

Area	Median Household Income	80% below Median	50% below Median
Statewide	$52,538	$42,030.40	$26,269.00
Adair	$37,940	$30,352.00	$18,970.00
Cherokee	$47,421	$37,936.80	$23,710.50
Muskogee	$44,166	$35,332.80	$22,083.00
Okmulgee	$48,689	$38,951.20	$24,344.50
Pottawatomie	$54,896	$43,916.80	$27,448.00
Seminole	$40,190	$32,152.00	$20,095.00
Tulsa	$60,382	$48,305.60	$30,191.00

Table 22

Data source: U.S. Census Bureau, American Community Survey DP03, 5-Year Estimates, 2021, data.census.gov.

Income Demographics - Low Income

Poverty Level

Demographic	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	583,853	248,204	113,132

Table 23

Note: Source: U.S. Census Bureau, American Community Survey S1702, 5-Year Estimates, 2021, data.census.gov.

LMI Analysis - Overall

Low-Income Population in Disaster-Impacted Areas

Geographic Area	Total LMI Persons	Total Population	Percent LMI
Area wide	715,878	1,655,793	43.23%

Table 24

Note: Source: U.S. Department of Housing and Urban Development, "FY 2023 ACS 5-Year 2011-2015 LMI Summary Data," 2023, https://www.hudexchange.info/programs/acs-low-mod-summary-data/. and U.S. Department of Housing and Urban Development, "FY2022 Data Update for LMI Area Benefit Designation for HUD's Indian Community Development Block Grant (ICDBG) | HUD USER," n.d., https://www.huduser.gov/portal/icdbg2022/home.html.

LMI Analysis - Federally Declared Disaster Areas

Table 1: LMI Analysis - Federally Declared Disaster Areas

County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Okmulgee County	0	0	0	17,500	38,025	46.02%
Muscogee Creek Nation	0	0	0	335,851	775,638	43.30%
Seminole County	11,865	24,835	47.78%	0	0	0
Adair County	11,668	22,120	52.75%	0	0	0
Cherokee County	20,859	45,805	45.54%	0	0	0
Muskogee County	30,765	66,560	46.22%	0	0	0
Pottawatomie County	26,470	67,800	39.04%	0	0	0
Tulsa County	260,900	615,010	42.42%	0	0	0

Table 25

Note: Source: U.S. Department of Housing and Urban Development, "FY 2023 ACS 5-Year 2011-2015 LMI Summary Data," 2023, https://www.hudexchange.info/programs/acs-low-mod-summary-data/. and U.S. Department of Housing and Urban Development, "FY2022 Data Update for LMI Area Benefit Designation for HUD's Indian Community Development Block Grant (ICDBG) | HUD USER," n.d., [https://www.huduser.gov/portal/icdbg2022/home.html.](https://www.huduser.gov/portal/icdbg2022/home.html) "MIDs" here includes only the HUD-identified MIDs.

Manufactured Housing Units Impacted by Disaster

Manufactured Housing Units Impacted by Disaster

County/Municipality	Number of Units	% Of Total Units in County/Municipality	Remaining Unmet Need
Adair	20	1.11%	$7,659.97
Cherokee	11	0.24%	$7,796.63
Muskogee	40	1.21%	$6,918.05
Okmulgee	41	1.66%	$6,635.39
Pottawatomie	16	0.43%	$5,089.07
Seminole	46	2.58%	$114,901.14
Tulsa	15	0.23%	$181.00
Muscogee Creek Nation	0	0	0

Table 26

Note: Source: FEMA, DR-4657 Individual Assistance Data, 2022. And U.S. Census Bureau, American Community Survey, DP04, 5-Year Estimates, 2021, data.census.gov.

Limited English Proficiency Population of Disaster-Related Areas

Spanish LEP Speakers in Impacted Counties

County	Total number of Spanish LEP Speakers (Estimate)	Percent LEP of Total Speaker Population (Estimate)
Adair	108 ± 78	1.01%
Cherokee	611 ± 175	1.76%
Muskogee	635 ± 190	1.32%
Okmulgee	151 ± 79	0.66%
Pottawatomie	383 ± 105	0.72%
Seminole	165 ± 92	1.15%
Tulsa	24919 ± 885	4.17%

Table 27

Note: Source: U.S. Census Bureau, American Community Survey, C16001, 5-Year Estimates, 2021, data.census.gov. LEP data is not available at the tribal level. Percentages are calculated using the upper estimate of the margin of error.

Vietnamese LEP Speakers in Impacted Counties

County	Total number of Vietnamese LEP Speakers (Estimate)	Percent LEP of Total Speaker Population (Estimate)
Adair	57 ± 65	0.66%
Cherokee	1 ± 5	0.01%
Muskogee	116 ± 43	0.25%
Okmulgee	0 ± 21	0.06%
Pottawatomie	20 ± 21	0.06%
Seminole	0 ± 18	0.08%
Tulsa	1832 ± 339	0.35%

Table 28

Note: Source: U.S. Census Bureau, American Community Survey, C16001, 5-Year Estimates, 2021, data.census.gov. LEP data is not available at the tribal level. Percentages are calculated using the upper estimate of the margin of error.

Chinese LEP Speakers in Impacted Counties

County	Total number of Chinese LEP Speakers (Estimate)	Percent LEP of Total Speaker Population (Estimate)
Adair	2 ± 7	0.05%
Cherokee	15 ± 19	0.08%
Muskogee	7 ±15	0.04%
Okmulgee	12 ± 21	0.09%
Pottawatomie	30 ± 36	0.10%
Seminole	5 ± 7	0.05%
Tulsa	782 ± 200	0.16%

Table 29

Note: Source: U.S. Census Bureau, American Community Survey, C16001, 5-Year Estimates, 2021, data.census.gov. LEP data is not available at the tribal level. Percentages are calculated using the upper estimate of the margin of error.

Point-in-Time Count - Type of Shelter

Point in Time Count - Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
No Data Available	No Data Available	No Data Available	No Data Available	No Data

Table 30

Point-in-Time Count - Impacted by Disaster

Table 2: Point in Time Count: Impacted by Disaster

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
No Data Available	No Data Available	No Data Available	No Data Available	No Data

Table 31

Assisted Housing Impacted by the Disaster

No damages to assisted housing units were reported by communities and stakeholders. ODOC will update this table with new data as it becomes available.

Assisted Housing Units Impacted by Disaster

County/Municipality	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Adair	0	0	8	0	80	0	0
Cherokee	0	0	8	0	0	0	0
Muskogee	1053	0	14	0	426	0	0
Okmulgee	118	0	3	0	80	0	0
Pottawatomie	536	0	20	0	501	0	0
Seminole	346	0	9	0	238	0	0
Tulsa	6991	0	47	0	492	0	0

Table 32

Note: Source: U.S. Department of Housing and Urban Development.

Infrastructure Unmet Need

Disaster Damage and Impacts - Infrastructure.

The infrastructure conditions in the impacted counties before the disaster consisted of many state and local roads and highways crossing predominately rural areas. The primary damage from the event is due to roads and bridges impacted by high flooding. Many areas also saw an impact on energy infrastructure due to high winds and tornadoes. Most residents of Seminole County had no power service for more than seven days after the disaster. The Muscogee (Creek) Nation saw extensive road damage because of flooding. Muskogee County had multiple closed highways due to flooding.

Public assistance includes a wide range of work, from extensive debris removal across the area to impacts on community water systems, public utilities, public buildings, open space infrastructure, irrigation ditches, fire suppression, and emergency operations. Public assistance was made available by FEMA to the Muscogee (Creek) Nation for DR-4670. Damage estimates from FEMA put the cost of damage at $253,519.00. The Muscogee (Creek) Nation has estimated over $7,000,000.00 in infrastructure projects and a minimum of $3,000,000.00 in unmet infrastructure needs. The Nation is currently working with FEMA to release public assistance funds; however, no FEMA public assistance funds have been awarded. The data included below is based on communication with the Muscogee (Creek) Nation and will be updated if more data becomes available.

Damage within the Muscogee (Creek) Nation from the May 2022 Storm event

Figure 20

Note: Source: Muscogee (Creek) Nation.

Impacts on roads and bridges were greatest in the Muscogee Nation. The flooding caused many roads to wash out, buckle, or collapse entirely. The Nation continues to work to repair damaged infrastructure, despite multiple subsequent disasters impacting infrastructure in the area.

The Muscogee Nation is responsible for administering the Hazard Mitigation Grants associated with DR 4670 and the May 2022 storms. The Nation is working with FEMA to release the funds. As of plan publication, no hazard mitigation projects have been funded or requested. ODOC will update the available hazard mitigation data if more information becomes available.

Infrastructure projects funded with CDBG-DR funds will incorporate mitigation and preparedness wherever possible so that reconstructed or repaired infrastructure will be more resilient to future disasters. An essential aspect of recovery is mitigating the impacts of future disasters. ODOC will prioritize projects with mitigation and preparedness aspects. ODOC will work with subrecipients to align investments with capital improvement plans and prevent duplication of benefits.

After the disaster, some communities may pivot funds from other sources such as CDBG and capital improvement funds to repair infrastructure damaged by the disaster. In addition, the USDA has several programs for repairing essential community facilities in rural areas, including one specific to areas impacted by the May 2022 disaster. Some communities may have access to insurance funds that provide funds for repairs to infrastructure after a disaster. Consideration of these other sources of assistance when planning for the use of funds can help limit the possibility of duplication between CDBG-DR and other assistance.

At this time, no public services are necessary to complement infrastructure activities as described in this Action Plan. The State will monitor the infrastructure programs and activities and add public services via a substantial amendment to this Action Plan if it is determined to be necessary for full access to the program.

Total Cost and Need by PA Category

Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
Category A: Debris removal	$15,000	$3,750.00	$3,000.00	$6,750.00
Category B: Emergency protective measures	$75,000	$18,750.00	$15,000.00	$33,750.00
Category C: Roads and bridges	$6,800,500	$1,700,125.00	$1,360,100.00	$3,060,225.00
Category D: Water control facilities	$0	$0.00	$0.00	$0.00
Category E: Public buildings and contents	$500,000	$125,000.00	$100,000.00	$225,000.00
Category F: Public utilities	$0	$0.00	$0.00	$0.00
Category G: Parks, recreational, and other facilities	$0	$0.00	$0.00	$0.00
Total	$7,390,500.00	$1,847,625.00	$1,478,100.00	$3,325,725.00

Table 33

Note: Source: The Muscogee Nation. Data will be updated if more information becomes available.

Hazard Mitigation Needs per County or Known Project

Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need
No Data Available	No Data	No Data	No Data

Table 34

Note: Source: Conversations with the Muscogee Nation. Data will be updated if more information becomes available.

Economic Revitalization Unmet Need

Disaster Damage and Impacts - Economic Revitalization.

The communities impacted by the disaster frequently have small hubs of economic activity in their main street areas. Downtown Seminole's Main Street was the most heavily impacted economic hub, as an EF2 tornado tore through the area, damaging business facades and nonprofit buildings.

Other businesses across the state were impacted by flooding. Muskogee County was heavily impacted by flooding throughout the county, resulting in the closure of at least one employer in the county. Superior Linen Service closed its Muskogee facilities after more than 6 feet of water entered the building. The company cited challenges in obtaining flood insurance as a reason for not rebuilding at the site.

SBA Business Loan Data, DR-4657 and DR-4670

County	Total Verified loss	Total loan amount	Unmet need
Adair	$170,002.27	$3,000.00	$167,002.27
Cherokee	$30,167.56	$0.00	$30,167.56
Muskogee	$1,022,319.65	$381,400.00	$640,919.65
Okmulgee	$280,278.21	$0.00	$280,278.21
Pottawatomie	$238,386.16	$0.00	$238,386.16
Seminole	$1,793,383.79	$998,260.00	$795,123.79
Tulsa	$100,563.26	$0.00	$100,563.26
Total	$3,635,100.90	$1,382,660.00	$2,252,440.90

Table 35

Note: Source: SBA, Disaster Loan Data, DR-4657 and DR-4670, 2022.

The Small Business Administration allocated a significant amount of disaster recovery loans to businesses in Muskogee and Seminole County. Other impacted areas did not receive funds. The data includes loans from both DR-4657 and DR-4670. The only loan associated with DR-4670 was in Muskogee County.

Some programs from USDA Rural Development may be valuable for helping businesses recover after a disaster. However, there are no programs offered by the USDA specific to disaster recovery for businesses and economic development. Businesses often have access to insurance assistance and private loans. Consideration of these other sources of assistance when planning for the use of funds can help limit the possibility of duplication between CDBG-DR and other assistance.

Mitigation-Only Activities

This section serves as Oklahoma's mitigation needs assessment. Mitigation needs throughout the State of Oklahoma relate to threats from multiple types of natural disasters, as outlined in the state's hazard mitigation plan. ODOC is currently setting aside $600,000, or 8% of funds for planning activities that meet the definition of mitigation-only activities. Mitigation activities are defined as those 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 (88 Fed. Reg. 32055). ODOC is required to expend 15% or $975,000.00 of its funds on mitigation (88 Fed. Reg. 32055). In addition to planning activities, ODOC's housing and infrastructure programs will incorporate mitigation measures to meet or exceed the 15% mitigation set-aside requirement.

After the May 2022 disaster, communities may have access to other sources of assistance for hazard mitigation and planning. Consideration of these other sources of assistance when planning for the use of funds can help limit the possibility of duplication between CDBG-DR and other assistance. FEMA authorizes the Hazard Mitigation Grant Program after a presidentially declared disaster. HMGP provides funding to state, local, tribal, and territorial governments so they can develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in their communities. In this program, homeowners and businesses cannot apply for a grant. However, a local community may apply for funding on their behalf.

FEMA's Building Resilient Infrastructure and Communities (BRIC) program supports states, local communities, tribes, and territories as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards. Both BRIC and HMGP require a certain portion of the grant funds to be matched by the community. CDBG-DR funds are eligible to be used as a non-federal match for both FEMA BRIC and FEMA HMGP (88 Fed. Reg. 32064).

In addition, after the May 2022 disaster, USDA Rural Development authorized the Fiscal Year 2023 Disaster Relief Supplemental Grant Funds for the Community Facilities Technical Assistance and Training Grant Program. This program provides associations with Technical Assistance and/or training with respect to essential community facilities programs. The Technical Assistance and/or training will assist communities, Indian Tribes, and Nonprofit Corporations to identify and plan for community facility repairs because of damages resulting from Presidentially declared disasters in calendar year 2022.

Oklahoma's State Hazard Mitigation Plan

The following eleven natural disasters and hazards were identified in the state's hazard mitigation plan:

- Dam failure
- Drought

- Earthquake
- Extreme heat
- Flood
- Severe storms (Hail, Lightning)
- High Winds
- Soil Hazards
- Tornado
- Wildfire
- Winter Storms (Ice, Freezing Rain, Snow)
- Landslides

These hazards listed are in no order and not prioritized in order of risk and vulnerability. As seen in Table 36, flooding is the highest risk hazard in Oklahoma. Flooding risk has increased for all 77 counties in the state, according to the State's Hazard Mitigation Plan. The Oklahoma Water Resources Board is currently using CDBG-DR funding to produce more detailed floodplain maps throughout the state, to help mitigate risk and guide development decisions.

Natural Hazards and Probability in Oklahoma

Hazard	CPRI	Probability Assessment
Dam failure	2.5	Unlikely
Drought	3.1	No data
Earthquake	1.9	Possible
Extreme heat	2.95	No data
Flood	3.75	Highly Likely
Severe storms (Hail, Lightning)	3.1	No data
High Winds	2.95	No data
Soil Hazards	1.3	Unlikely
Tornado	2.95	No data
Wildfire	2.95	No data
Winter Storms (Ice, Freezing Rain, Snow)	1.65	No data
Landslides	1.3	No data

Table 36

Note: Source: Oklahoma's State Hazard Mitigation Plan. 2019. https://oklahoma.gov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf The Calculated Risk Priority Index (CPRI) is calculated using probability, severity, warning time, and duration data. A higher number means the hazard is a greater risk to the State. The probability assessments come from the language in the State Hazard Mitigation Plan. Not all hazards provided a probability assessment.

Other likely hazards in the state are drought, extreme heat, high winds, tornados, and wildfires. All these hazards are likely to impact the entire state and are not concentrated in particular areas. High winds, tornados, and severe storms are often associated with one another, frequently occurring simultaneously, and impacting the same areas. In addition, Oklahoma's historical tornadic patterns increase the risk to life and property because of their frequency near the two population centers of the state: Tulsa and Oklahoma City (Figure 21).

Jurisdiction Affected by Tornadic Hazards

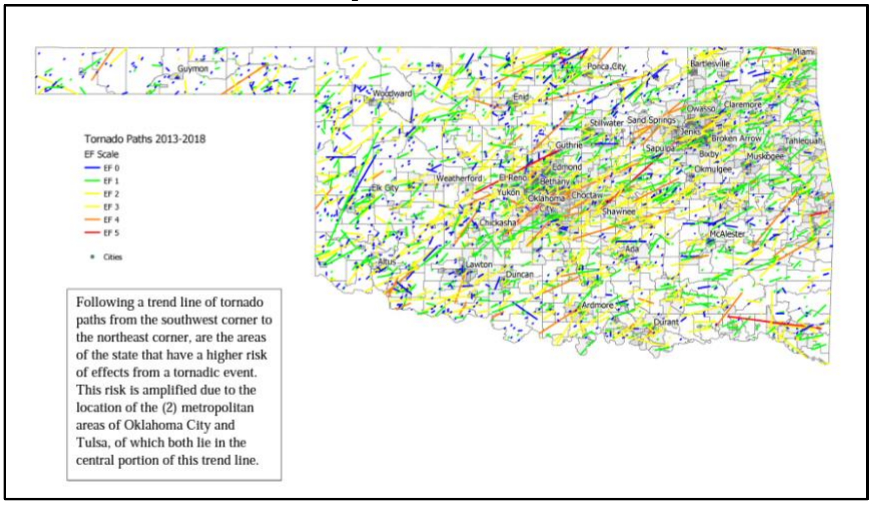

Figure 21

Note: Source: Oklahoma's State Hazard Mitigation Plan. (2019). https://oklahoma.gov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf

In addition, Oklahoma frequently has more severe thunderstorm watches than anywhere else in the nation (Figure 22). Severe thunderstorms are defined as follows: 1) Winds of 58 mph or higher and/or 2) Hail 1 inch in diameter or larger. Climate models project an increase in the frequency and intensity of severe thunderstorms over the Southern Great Plains, especially during the peak storm season (March, April, and May).

Annual Average Severe Thunderstorm Watches per Year (1993-2012)

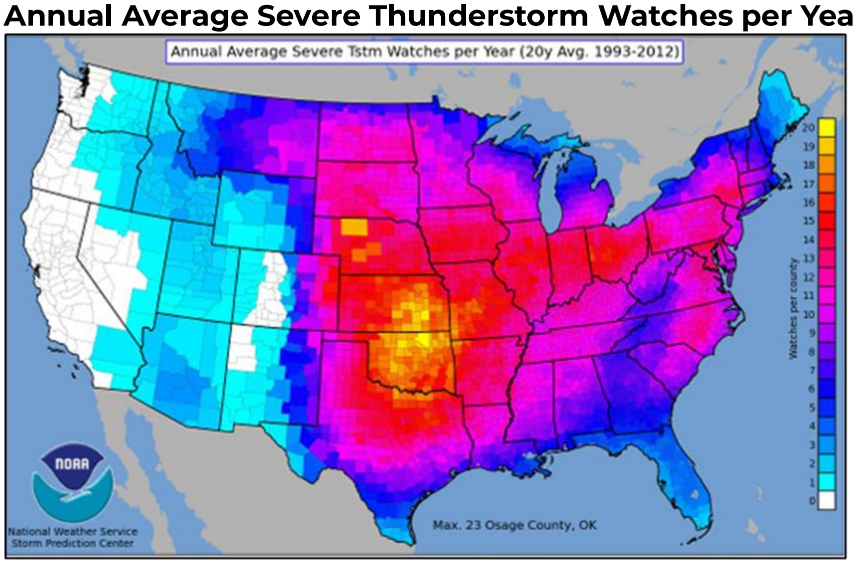

Figure 22

Note: Source: Oklahoma's State Hazard Mitigation Plan. 2019. https://oklahoma.gov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf

The National Risk Index, published by FEMA, is a dataset and online tool used to indicate risk for natural hazards in the United States by county. There are 18 national hazards included in the index: Avalanche, Coastal Flooding, Cold Wave, Drought, Earthquake, Hail, Heat Wave, Hurricane, Ice Storm, Landslide, Lightning, Riverine Flooding, Strong Wind, Tornado, Tsunami, Volcanic Activity, Wildfire, and Winter Weather. The index includes data about expected annual loss from disasters, social vulnerability, and community resilience. A lower risk score indicates a community has low expected annual loss, low social vulnerability, and high community resilience.

Note: FEMA, National Risk Index, 2023, Hazards.fema.gov, 2023, https://hazards.fema.gov/nri/map.

Of the May 2022 disaster-impacted counties, Tulsa County has a relatively high-risk index rating, and Muskogee County and Seminole County have relatively moderate risk index ratings. The remaining four counties have relatively low index ratings. Figure 23 shows the National Risk Index for each impacted county. More rural counties tend to rank lower overall than urban counties, because of the low estimated annual loss for areas with low population densities. However, Cherokee, Okmulgee, Seminole, and Adair County all have very high social vulnerability, and very low community resilience (FEMA, 2023). These communities may not have many high value structures, but when impacted by a disaster, the recovery will be challenging.

National Risk Index for Impacted Counties

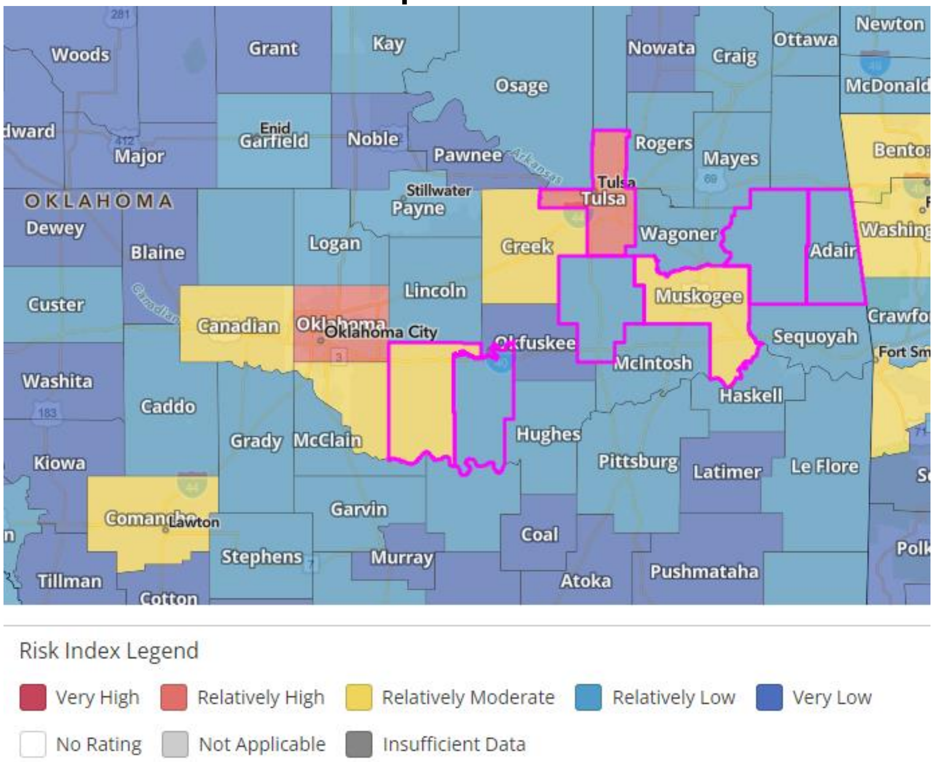

Figure 23

Note: Source: FEMA, National Risk Index, 2023, Hazards.fema.gov, 2023, https://hazards.fema.gov/nri/map. Impacted counties are outlined in pink.

Mitigating Risk

An important consideration for evaluating community risk is to look at community lifelines. Community lifelines are fundamental services in the community that enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security. Lifelines are the most fundamental services in the community that, when stabilized, enable all other aspects of society. Examples of community lifelines include communications, safety and security, or transportation. When community lifelines are disrupted, decisive intervention is required to restore the service. Mitigating risk to community lifelines can reduce the impact of disasters and may result in faster and more effective response and recovery.

Community Lifelines

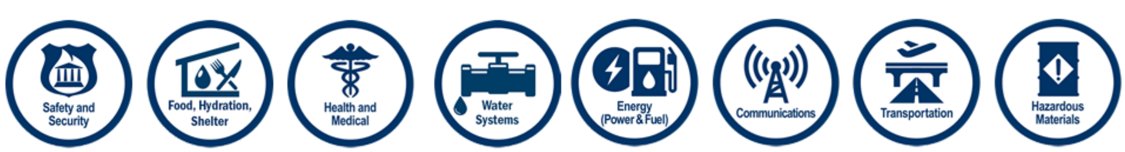

Figure 24

Note: Source: FEMA's Community Lifelines Implementation Toolkit. https://www.fema.gov/emergency-managers/practitioners/lifelines-toolkit

Mitigation solutions designed to be resilient only to threats and hazards related to the May 2022 disaster can leave a community vulnerable to negative effects from future extreme events related to other threats or hazards. FEMA's National Building Code Adoption Tracking Portal identifies 76 of 77 Oklahoma Counties as having an old or weakened building code or no code standard when looking at combined hazards.

Note: National Building Code Adoption Tracking Portal, Accessed Dec 12, 2023. https://stantec.maps.arcgis.com/apps/MapSeries/index.html?appid=a053ac48343c4217ab4184bc8759c350.

In conversations with stakeholders in the state, a need for updated building codes was identified as an area of potential mitigation improvement. Building codes that protect homeowners against high winds and hail would be invaluable in reducing the risk of severe storms, high winds, and tornadoes. Requiring strong buildings also reduces the risk to community lifelines, like homes and essential businesses.

The cost and benefit analysis of incorporating hazard mitigation measures often shows that the mitigation measures are worth the additional up-front cost. Oklahomans pay more for homeowners' insurance than in any other state, due to the impacts from hail, wind, tornadoes, and earthquakes.

Note: Sarah Schlichter and Kayda Norman, "The Best Homeowners Insurance in Oklahoma for 2023," ed. Caitlin Constantine, NerdWallet, May 8, 2023, https://www.nerdwallet.com/article/insurance/home-insurance-oklahoma-ok.

Investments in impact-resistant shingles or other stronger building materials that reduce the impacts of severe storms and tornadoes can lessen the cost of homeowners insurance throughout the state, as well as the cost of recovery to public agencies from a disaster. Some insurance companies offer an immediate discount on an individual's homeowners' insurance if they upgrade to Class 3 or 4 impact-resistant shingles. The costs of these stronger materials are higher by $1,800 to $2,500, but the benefits may ultimately be to reduce costs for households across the state.

Note: "Commissioner Doak Urges Oklahomans to Consider Impact-Resistant Shingles," www.about.ok.gov (Oklahoma Insurance Department, October 2, 2015), https://www.about.ok.gov/triton/modules/newsroom/newsroom_article.php?id=157&article_id=16776. Ibid.

Oklahoma's broadband gaps also represent risks in rural areas to essential communications services. Communications services are a community lifeline. The broadband gaps are shown in Figure 25: Broadband Gaps in Disaster-Impacted Areas. The areas with poor broadband service compared to the rest of the nation are also low-income and are dominated by tribal nations. The equity and mitigation impact of improving broadband service and access in these areas would compound upon one another, resulting in a stronger, more resilient community.

Broadband Gaps in Disaster-Impacted Areas

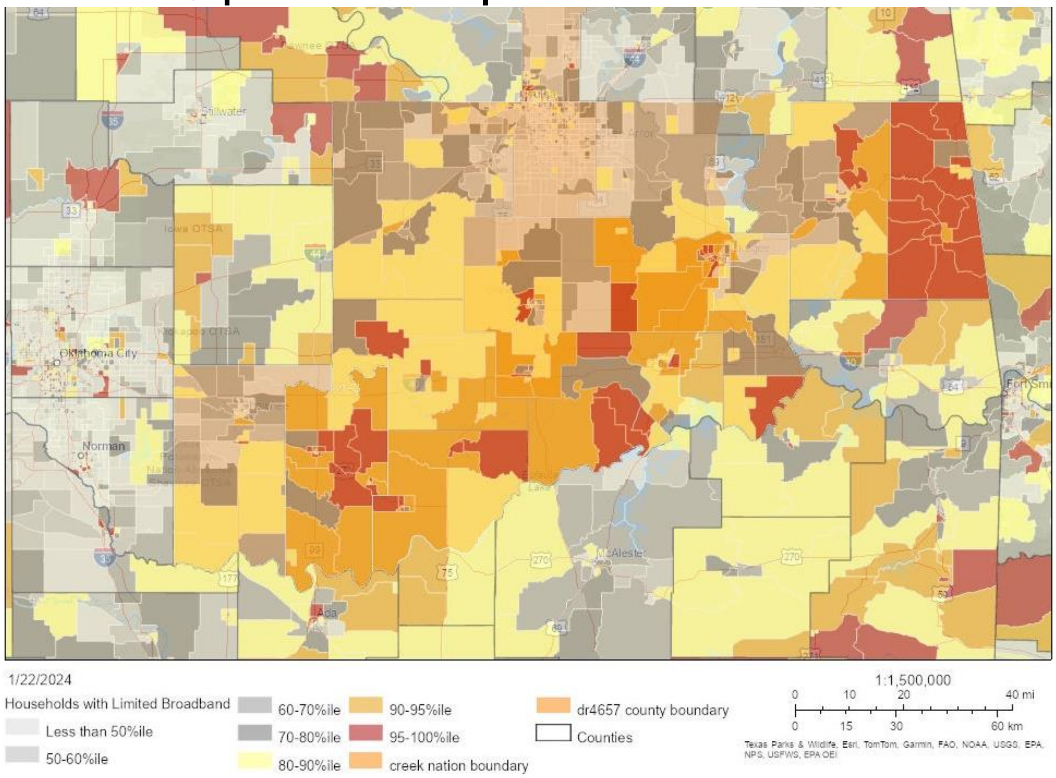

Figure 25

Note: Source: EPA's Environmental Justice Screening and Mapping Tool (Version 2.2). [*https://ejscreen.epa.gov/mapper/*](https://ejscreen.epa.gov/mapper/)

The Fifth National Climate Assessment predicts increases in drought and extreme heat for Kansas, Oklahoma, and Texas, regardless of emissions reductions.

Note: R.A. McPherson et al., "Fifth National Climate Assessment: Chapter 26: Southern Great Plains," NCA 2023 (Washington, D.C., USA: U.S. Global Change Research Program, 2023), https://nca2023.globalchange.gov/chapter/26.

Climate hazards are expected to become more frequent, intense, and broad throughout the region. Resilience actions identified to address drought in Oklahoma include activities such as site-specific water conservation and drought contingency plans, replace leaking pipes and infrastructure, and biodiversity improvements (R.A. McPherson et al.) These mitigation actions can be combined with a community lifelines framework. For example, implementing water conservation measures as a regular practice ensures that during severe drought, water services can remain available to the community. More information on mitigation and resilience actions that can be taken to reduce the impacts of climate change in Oklahoma can be found in Chapter 26 of the Fifth National Climate Assessment.

CDBG-DR activities may also mitigate environmental concerns and increase resilience among members of protected classes, vulnerable populations, and underserved communities to protect against the effects of extreme weather events and other natural hazards. Recipients of CDBG-DR funds should consider the impacts of the proposed project with a perspective of equity and protecting the most vulnerable communities. The Climate and Economic Justice Screening Tool

Note: "Climate and Economic Justice Screening Tool," Council on Environmental Quality, 2024, https://screeningtool.geoplatform.gov/en/#7.16/35.323/-95.925.

also includes valuable information on protected classes in Oklahoma, and the census tracts within the disaster-impacted area which are overburdened and underserved. Unfortunately, every census tract in the impacted area is considered disadvantaged by the Climate and Economic Justice Screening Tool. Most of these tracts are within tribal nations and are thus automatically considered disadvantaged communities.

Projects funded by ODOC under this Action Plan will promote sound, sustainable long-term recovery planning by addressing risks identified in the Action Plan. These risks were exacerbated by the disaster. The risks identified in this Action Plan will be used to develop resilience performance metrics for each funded activity. These metrics will ensure that structures and infrastructure rebuilt or newly built with CDBG-DR funding will be more resilient and less susceptible to damage from disasters.

Mitigation needs in the state revolve around reducing flooding and high wind risk which will help mitigate the impacts of flooding, tornadoes, severe storms, and high winds. Mitigating risk to community lifelines will speed response and recovery, while reducing potential devastation. Mitigation that considers protected classes, vulnerable populations, and underserved communities will have cascading positive impacts, by increasing resilience and advancing equity in these communities. Increasing Oklahoma's resiliency to drought and extreme heat is also essential to preventing loss of life and property. ODOC has identified vulnerabilities that are tied to the May 2022 disaster as well as those which do not tieback to this disaster. Implementation of projects to mitigate these risks can enhance protection and save lives, maximize the utility of scarce resources, and benefit the community long after the projects are complete.

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