

State of Georgia **Disaster Recovery Plan**

Submitted to HUD: December 19, 2018
Action Plan Approved by HUD: March 15, 2019



Table of Contents

Action Plan Revision History	1
Substantial Amendment 1: Revised Budget	2
Executive Summary.....	3
1. Introduction.....	3
2A: Community Profile: Summary of Impact and Presidentially Declared Counties	6
2B: Targeting Priority Needs	14
3. Impact and Assessment.....	15
3A: Demographic Profile of Most Impacted and Distressed Areas	15
3B: Impact on Low and Moderate-Income Populations	16
3C: Vulnerable Populations.....	25
3D: Impact on Special Needs Populations	31
3E: Transitional Housing/Homelessness.....	35
3F: Summary of Housing Impact.....	38
3G: Housing Types Affected.....	41
3G.1: Single Family.....	42
3G.2: Rental Housing	44
3G.3: Mobile Homes	45
3G.4: Public Housing	47
3H: Fair Housing.....	47
3I: Housing Funds Made Available.....	49
3J: Federal Emergency Management Agency (FEMA) Assistance	49
3K: Small Business Administration (SBA) Home Loans	49
3L: National Flood Insurance Program (NFIP) Coverage.....	50
4. Unmet Needs.....	51
4A: Housing Unmet Needs.....	51
4B: Infrastructure Impact and Unmet Needs	55
4C: Economic Impact and Unmet Needs	57
5. Funding Priorities	59
5A: Priorities for Funding Allocation.....	59

6. Method of Distribution	62
6A: Introduction and Allocations	62
6B: Budget.....	62
6C: Connection to Unmet Needs	64
6D: CDBG-DR Program National Objectives.....	64
6E: Duplication of Benefits.....	65
6F: Public Services:.....	65
6G: Eligible Activities:.....	65
6H: Planning.....	66
6 6H: Affordable Multifamily Rental Program	67
6 6I: Homeowner Rehabilitation and Reconstruction Program	71
6 6J Buyout and Acquisition Program.....	74
6K HMGP Program	76
6L: Infrastructure Program	77
6 6M: Planning and Administration Activities.....	78
6 6N: Expenditure Schedule	79
6 6P: General Requirements	81
6 6P1: Protection of People and Property: Construction Methods	81
6 6P2: Home Elevation	81
6 6P3: Section 8 Tenants and Housing Needs of Persons that are Homeless.....	82
6 6P4: Cost Reasonableness/Effectiveness	82
6 6P5: Demonstrable Hardship & Exceptions	82
6 6P6: Stormwater Infrastructure Needs	82
6 6P7: Leveraging of Funds.....	82
6 6P8: Citizenship	83
6 6P9: Additional Resources.....	83
7. Program Administration.....	84
7A: Citizen Participation – Outreach Efforts	84
7B: Public Notice and Comment Period of Draft Action Plan	84
7C: Amendments to the Action Plan.....	84
7D: Performance Reporting	85
7E: Limited English Proficiency	85

7F: Applicants.....	85
7G: Citizen Complaint Procedures	86
7H: Program Income	86
7I: Pre-agreement Activities	86
7J: Anti-displacement.....	86
8. Pre-award Implementation Plan	87
Background	87
Purpose	88
Risk Analysis and Documentation.....	89
Financial Controls & Procurement Processes	89
Procedures to Prevent Duplication of Benefits	90
Timely Expenditure of the Funds	91
Detect and Prevent Fraud Waste and Abuse.....	92
Procedures to Maintain a Comprehensive Website.....	93
Capacity Assessment.....	96
Staffing.....	97
Technical Assistance	101
Accountability	102
Certification of Accuracy of Risk Analysis Documentation	102
Appendices.....	103
Grantee Certifications.....	103
Income Limits.....	105
Public Comments	107

Action Plan Revision History

Substantial Action Plan Amendment #1

Comment Period: July 2, 2020 – August 1, 2020 5:00PM

Submitted to HUD for Approval: August 1, 2020 After 5:00PM

Below is a summary of the key changes for Amendment 1. Note, all changes are not listed in this summary, however, all changes are accentuated in the Action Plan using the following formatting:

Additions: Font color red, underline

Deletions: ~~Font color red, strike-through text~~

Section	Sub-Section	Page Number	Description
Section 6: Method of Distribution	Budget; Affordable Multifamily Rental; Planning; Expenditure Schedule	63 67 79	Re-allocated \$970,664 from Planning to Affordable Multifamily Rental. Both sections of the plan have been updated to reflect this change. A narrative for this change has been added to the Affordable Multifamily Rental Program Section. All budget tables and the expenditure schedule have been updated.
Section 6: Method of Distribution	Homeowner Rehabilitation and Reconstruction Program	71	<ol style="list-style-type: none"> 1. Language changed to reflect using deferred payment loans with incremental forgiveness as anti-flipping control measure. 2. Not Suitable for Rehabilitation, Ineligible Activities, and temporary relocation assistance– language changed in each of these sections to reflect DCA defined these terms in the program manual.
Section 6: Method of Distribution	Buyout and Acquisition Program	74	<ol style="list-style-type: none"> 1. Made acquisition an eligible activity. Renamed sub-section as Buyout and Acquisition Program (previously named Buyout). 2. Changed the method for determining program maximum. The method was using FHA Mortgage Limits, however, now DCA will rely on post-storm Fair Market Value appraisals. 3. Buyouts will be based on Post-Storm FMV, not Pre-Storm FMV. Text throughout the section has been updated to reflect this change. 4. Updated text regarding applicant instructions for determining application status. Case managers will not be used for the program. Applicants shall contact local government subrecipients or DCA.
Section 6: Method of Distribution	Hazard Mitigation Grant Program	76	Removed the following language: “HMGP match projects are limited to structural elevation and debris removal”.
Section 6: Method of Distribution	Infrastructure Program	77	Added an infrastructure program to include \$13,015,596 allocated to the State of Georgia in Federal Register Notice 85 FR 4681.
Section 6: Method of Distribution	Method of Distribution	66	<p>Moved section 6H: Planning previously on page 64 to the Planning and Administration sub-section to reduce redundancies in the Action Plan.</p> <p>Added Infrastructure Program as Section 6L.</p> <p>Made HMGP a separate section named Section 6K.</p> <p>Renamed each sub-section for continuity.</p>
Section 7: Pre Award Implementation Plan	Pre Award Implementation Plan	87	<p>Removed the Pre-Award Implementation Plan from the Action Plan. This document is continually being updated, especially the staffing section. DCA will maintain this document as a stand-alone document.</p>

Substantial Amendment 1: Revised Budget

A copy of the budget including mark-ups can be found on page 63.

Table 39: Programs and Allocations							
Housing Program Type	Allocation	% of Allocation	MID Allocation	15-County Allocation	Amount serving LMI	LMI %	National Objective
Affordable Multifamily Rental	\$13,470,664	26%	\$13,470,664	\$0	\$13,470,664	100%	LMI
Home Owner Rehabilitation & Reconstruction	\$8,000,000	16%	\$8,000,000	\$0	\$5,600,000	70%	LMI/ UN
Buyout & Acquisition	\$6,854,400	13%	\$6,984,400	\$0	\$3,084,480	45%	LMB/ LMA/
HMGP	\$3,000,000	6%	\$1,000,000	\$2,000,000	\$1,200,000	40%	LMI/ UN
Infrastructure	\$12,364,816	25%	\$9,891,853	\$2,472,963	\$7,418,890	60%	LMI/ UN
Total Program Budget	\$43,689,880	86%	\$39,216,917	\$4,472,963	\$30,774,034	70%	
Administration	\$2,547,930	5%	\$0	\$0	\$0		
Planning	\$4,720,786	9%	\$3,776,629	\$944,157	\$0		
Grand Total	\$50,958,596	100%	\$42,993,546	\$5,417,120	\$30,774,034		

Executive Summary

On April 10, 2018, under Public Law 115-123, HUD allocated \$37,943,000 in Community Development Block Grant Disaster Recovery Funds to the State of Georgia in response to two tornadoes occurring in January 2017 and Hurricane Irma. [Additionally, on January 27, 2020 under Federal Register Notice 85 FR 4681, HUD allocated an additional \\$13,015,596 in funding to the State of Georgia for infrastructure activities.](#) HUD identified three zip codes as “most impacted and distressed” and required that at least 80 percent of the allocation must first seek to address unmet needs within those areas. In addition, 15 counties were deemed eligible for FEMA individual and public assistance and are therefore eligible for the remaining 20% of the funds. This Action Plan will detail the proposed use of all funds, criteria for eligibility and how the use of these funds will address long-term recovery and restoration, unmet needs, and program administration.

1. Introduction.

In 2017, it seemed that the State of Georgia could not catch a break from severe weather. Dual catastrophic weather events harassed southern Georgia with destructive rain, wind, and cyclonic activity. On January 2, 2017 (DR# 4294) severe storms, tornadoes, and straight-line winds struck Dougherty and the surrounding counties. Then, on January 21st and 22nd (DR# 4297), forty-one tornados touched-down across the State of Georgia as part of a weather event that spawned the third-most tornados over a three-day event in recorded US history. Twenty-seven tornados struck on January 21st alone, but the most dreadful effects were witnessed in Berrien, Brooks, Cook, Dougherty, and Thomas Counties on January 22nd. In these counties, fourteen people perished in the storms, and, less importantly, millions of dollars of property damage was reported during the immediate recovery efforts.

As if the tornadic weather were not enough, September brought another spate of severe weather to South Georgia. Hurricane Irma made landfall in Florida on September 10th. Over the next two days, Irma worked its way up the Florida coast and into Georgia (DR# 4338). Once stationed over southern Georgia, Irma caused levels of damage and devastation not seen in this part of the state since 1994. A storm surge of more than four feet inundated the coast, and widespread flooding and power outages became the norm, not exceptions. In addition, fallen trees and windswept debris the area caused further damages to homes, buildings, and other infrastructure. The widespread nature of the damage resulted in millions of dollars in cleanup costs alone.

Overview of Tornados:

The January tornados were not the more expensive of the two disasters in terms of dollars and cents, but on a human scale, few natural disasters in Georgia’s history compare. The tornados impacted residents within the City of Adel as one tornado hit the Sunshine Acres Mobile Home Park. This single neighborhood alone experienced the deaths of seven residents, ranging from 19 to 62 years of age. A report from the Atlanta Journal Constitution six months after the storms noted that, while residents and volunteers have worked “daily” since the storm on repairs to their properties, work still remained to be done.

Additional damage from the tornados was observed in Albany, about 50 miles northwest of Adel, where an EF3 tornado killed five people. The Albany Herald reported on the one-year anniversary of the storm that “more than \$1 billion in local damages” resulted from the storm. Buildings that housed homes and businesses existed on a Friday, but by the time Monday came they were no more. Residents noted that it was the worst tornado to hit Albany in almost 80 years, since a February tornado in 1940 before the start of World War II, killed three and injured hundreds.

Overview of Irma:

While Hurricane Irma did not make a direct landfall on Georgia’s coast, one could barely take solace in this fact based on the damage witnessed in the aftermath of the storm. Georgia’s barrier islands, often referred to as the Golden Isles, saw massive amounts of erosion. Jekyll Island’s famed “Driftwood Beach,” so-called because of the beautiful collection of driftwood that collects each day and has inspired artists and poets alike for generations, saw all of the loose driftwood washed out to sea and many of the smaller trees obliterated. The scenic trees of Savannah and Saint Simons may be beautiful southern backdrops, but after their rain-soaked roots were pressured for hours by high winds, they became living nightmares for both residents and debris removal crews when their limbs and trunks littered the ground.

The short-term tasks of cleanup and the long-term damage to landscape aside, many communities experienced impacts from Irma that were not as easily foreseeable. The Georgia coast is as known for its mosquitos as it is for its beaches, and a number of communities were forced to conduct additional spraying rounds for the pestilent population. Under normal conditions, places like Glynn County are able to quickly and consistently keep standing water environments at a minimum. Irma changed the equation with the large rainfall totals and prioritization of other recovery activities over these regular patrols. They were forced to ramp-up operations in quick succession in order to meet FEMA’s reimbursement deadlines. While some were able to do this effectively, many were unable to conduct all of the recovery operations needed in the few months immediately following the disaster.

Summary and Conclusion:

All of the communities mentioned above experienced loss of life and major property damage; these places and their struggles were featured on local, state, and national news articles in the aftermath of the storms. The death and destruction, though, were not all that was wrought by the storms. Thousands of private citizens and many local governments felt the impact of the damaging winds, debris, flooding, and downed trees and power lines. These smaller, underreported stories are the ones that require the attention of the CDBG-Disaster Recovery funding. After the storms were over, the national newspapers left, and the cleanup began, many locals were unable to apply for and receive federal assistance that makes the difference between barely getting by and truly recovering. Millions of dollars in damage were reported through the numerous FEMA funding announcements after the storms, but not everyone was in a position to submit the applications and required documentation to benefit from these opportunities. Many individuals were already back working, trying to put food on their tables for themselves and their families, to deal with the federal requirements at the time. In fact, it took months for many people to truly understand the nature of their recovery needs. An analysis of these needs are discussed in Section 5: Unmet Needs.

Local governments also dealt with these same issues. Georgia has a high percentage of local governments with populations under 1000, this is especially true in South Georgia. Many of these cities are only staffed by part-time employees; the weeks and months following the storms were full of clearing roads, helping elderly citizens with their debris cleanup, flushing water lines, repairing lift stations, issuing boil-water advisories, patching potholes, shoring-up storm drains, and a myriad of other tasks that cities and counties with more robust budgets and staffs would be able to do in a matter of days. Those cities that do have larger staffs and budgets are still experiencing outsized problems and costs to match. Chatham and Glynn Counties, home to the cities of Savannah and Brunswick, respectively, both saw the full impacts of the four feet of storm surge. Roads were washed out, parks were flooded, homes were flooded, and commercial areas damaged, some buildings beyond repair.

Photographs of the disaster events:



Paradise Village Mobile Home Park, Dougherty County
January 2017 Tornado (Photo by: Darrell Ealum
Albany Herald)



A family collects salvageable belongings after the January
2017 Tornado. Adel, Ga (Photo by: Branden Camp AJC)



A woman holds a child, after a tornado along Hwy 122
near Barney, Ga (Photo by: Phil Sears AJC)



Flooding occurring in the Shady Acres Mobile Home Community
in Sterling, located in Glynn County, on September 12, 2017.
(Photo by: Tiffany Fields, The Brunswick News)

2A: Community Profile: Summary of Impact and Presidentially Declared Counties

Between January and September of 2017 South Georgia experienced tremendous disasters in the form of tornados, straight line winds, and Hurricane Irma. These disasters damaged homes, destroyed businesses, and above all claimed 14 lives.

On January 20-22, 2017, an upper-level low pressure system moved along the Gulf Coast and spawned tornadoes from Texas to South Carolina. Ahead of the storm system, southerly flow allowed warm and moist air to infiltrate the Southeast with record high temperatures exceeding 80°F and dewpoints greater than 70°F. This created conditions favorable for severe weather as colder air from the northwest moved towards the region behind the upper-level low. On January 22, two EF-3 tornadoes were responsible for 16 fatalities. The deadliest tornado of the outbreak impacted Brooks, Cook, and Berrien counties and killed 11 people. The EF-3 had a path length of nearly 25 miles and a width of 700 yards with estimated winds of 140 mph. The most destructive tornado, in terms of property damage, was an EF-3 that tracked 70.7 miles across southern Georgia. The tornado caused significant damage to homes and businesses in Albany, Georgia, and caused five fatalities and at least 40 injuries.

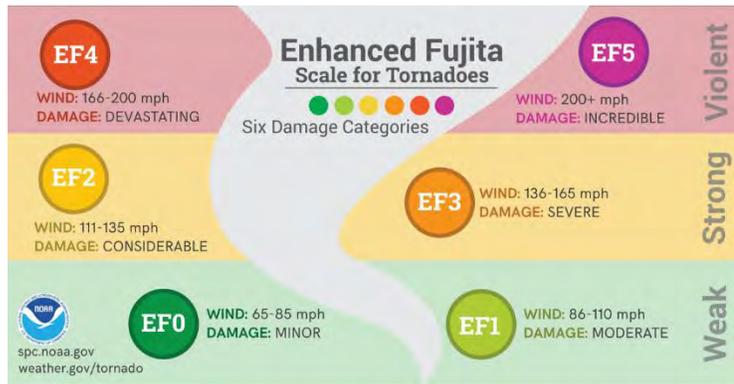
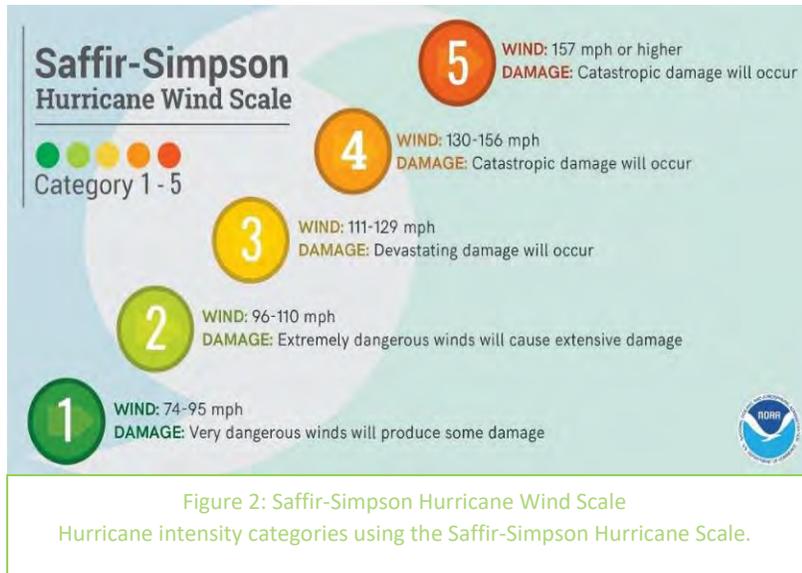


Figure 1: Enhanced Fujita Scale
The image figure shows the Enhanced Fujita scale and the corresponding magnitude and intensity measures.

A total of 41 tornadoes were confirmed from January 21-22 in Georgia, making this event the largest two-day outbreak in the state on record. The outbreak featured one of the longer tornado tracks on record, according to data from the National Weather Service. The tornado also had a maximum width spanning 1.25 miles wide. The tornado was on the ground for an hour and 12 minutes, tearing an almost 71-mile path through parts of five Georgia counties. The NWS damage survey noted severe tree damage along the entire path, with 90 to 100 percent of the trees in the path uprooted or snapped. A portion of a Proctor and Gamble plant in Dougherty County collapsed, and a concrete block church was demolished, suggesting estimated winds speeds reached 150 mph.

As a result of Hurricane Irma, In September 2017 major flooding occurred along the Georgia coast, particularly on St. Simon's Island and along the Satilla River. Rainfall totals were generally between 5 and 10 inches in coastal Georgia, and the maximum rainfall measured in the state was 10.34 inches in Nahunta in Brantley County from September 11-12. In Camden County, numerous trees and power lines were damaged due to the strong winds. Dozens of people were rescued by boats near the coast from flooding caused by storm surge and rainfall. Across the state, there were widespread downed trees, and over 1.5 million people lost power during the storm.



Hurricane intensity is classified into categories using the Saffir-Simpson Hurricane Scale. Irma was a long-lived Cape Verde hurricane that reached category 5 intensity across the northern Caribbean Islands. Irma made landfall as a category 4 hurricane in the Florida Keys and struck southwestern Florida at category 3 intensity. After hitting South Florida, Irma quickly moved north into Northern Florida, and then northwest into Georgia on September 11th as a tropical storm.

The combined effect of storm surge and the tide produced maximum inundation levels of 3 to 5 ft above ground level along the coast of Georgia. The NOS tide gauge in Chatham County measured a peak water level of 4.7 ft Mean Higher High Water (MHHW).¹ The heaviest rainfall totals were confined to southeast Georgia and widespread sustained winds of 30-45 mph with gusts in the 50-65 mph range downed numerous trees and power lines.

Georgians experienced more than approximately \$54.7 million in FEMA verified losses as a result Disasters 4294, 4297, and 4338. In a memo from Todd Richardson, Acting General Deputy Assistant Secretary for Policy Development and Research, HUD estimates there to be more than \$37,943,000 in unmet needs imposing strain on persons affected by the 2017 disasters.² Due to the extent of the disasters, President Trump approved major Disaster Declarations for 15 counties within the State of Georgia. The Declarations were made for the severe storms, tornadoes, and straight-line wind events on January 26, 2017 and Hurricane Irma on September 15, 2017. A list of the counties and disaster events can be seen in Table 1, on the following page.

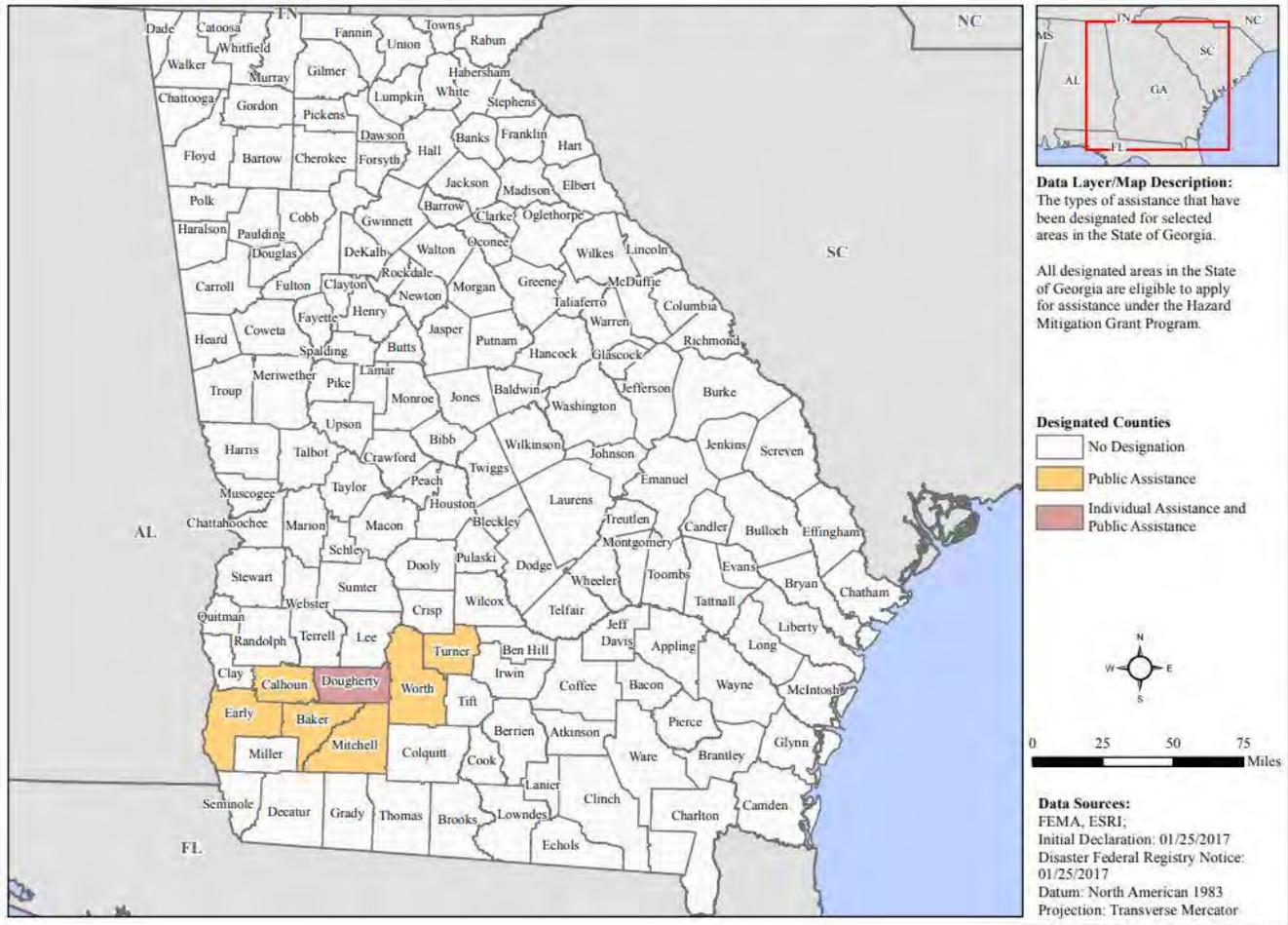
¹ NOAA Hurricane Irma Report

² Memo from Todd Richardson, Acting General Assistant Secretary for Policy Development and Research

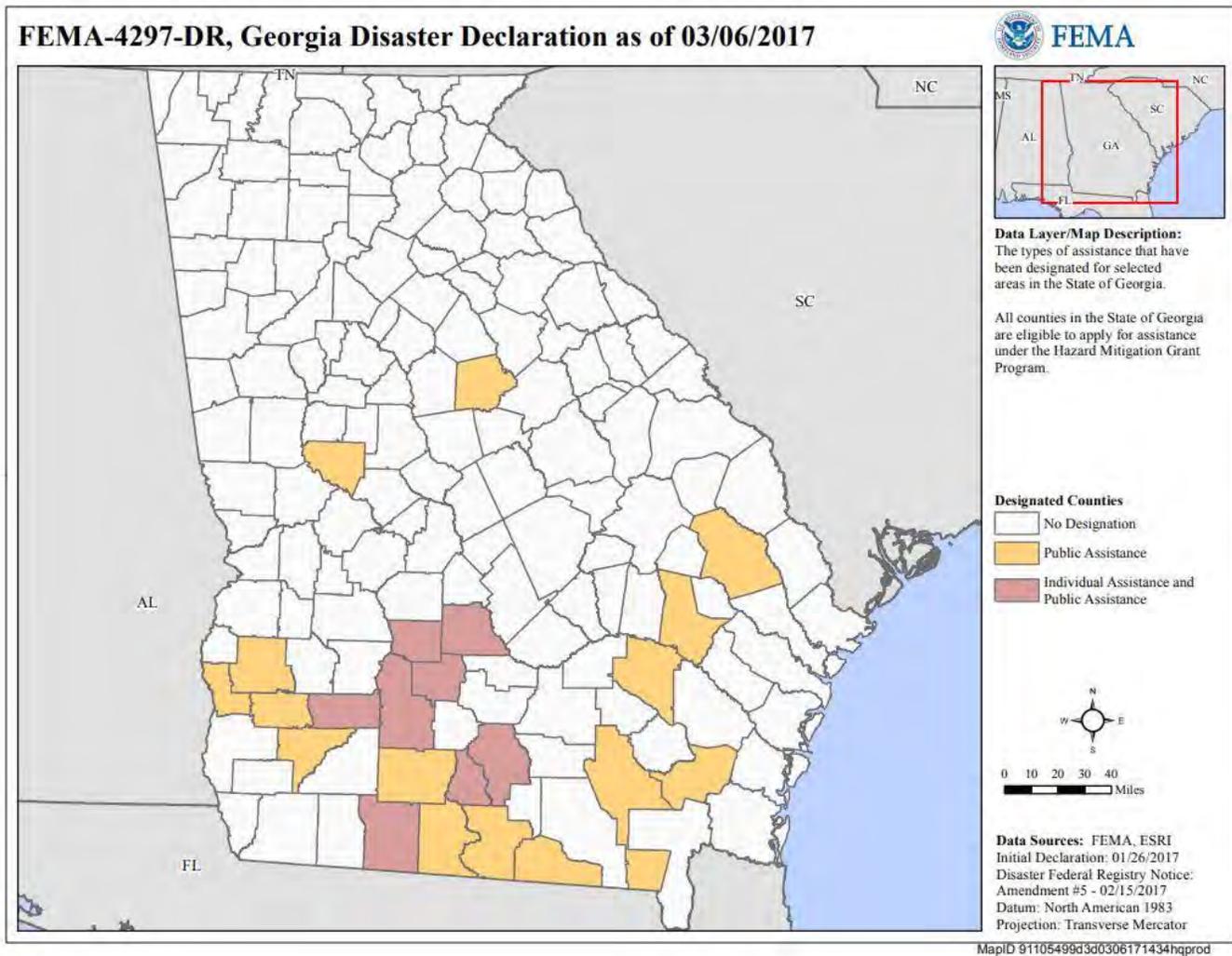
Table 1: List of Disaster Events by County

COUNTY	Disaster Event
BERRIEN	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
CAMDEN	Hurricane Irma (DR 4338)
CHARLTON	Hurricane Irma (DR 4338)
CHATHAM	Hurricane Irma (DR 4338)
COFFEE	Hurricane Irma (DR 4338)
COOK	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
CRISP	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
DOUGHERTY	Severe Storms, Tornadoes, and Straight-line Winds (DR 4294); (DR
GLYNN	Hurricane Irma (DR 4338)
LIBERTY	Hurricane Irma (DR 4338)
MCINTOSH	Hurricane Irma (DR 4338)
THOMAS	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
TURNER	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
WILCOX	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)
WORTH	Severe Storms, Tornadoes, and Straight-line Winds (DR 4297)

FEMA-4294-DR, Georgia Disaster Declaration as of 01/25/2017

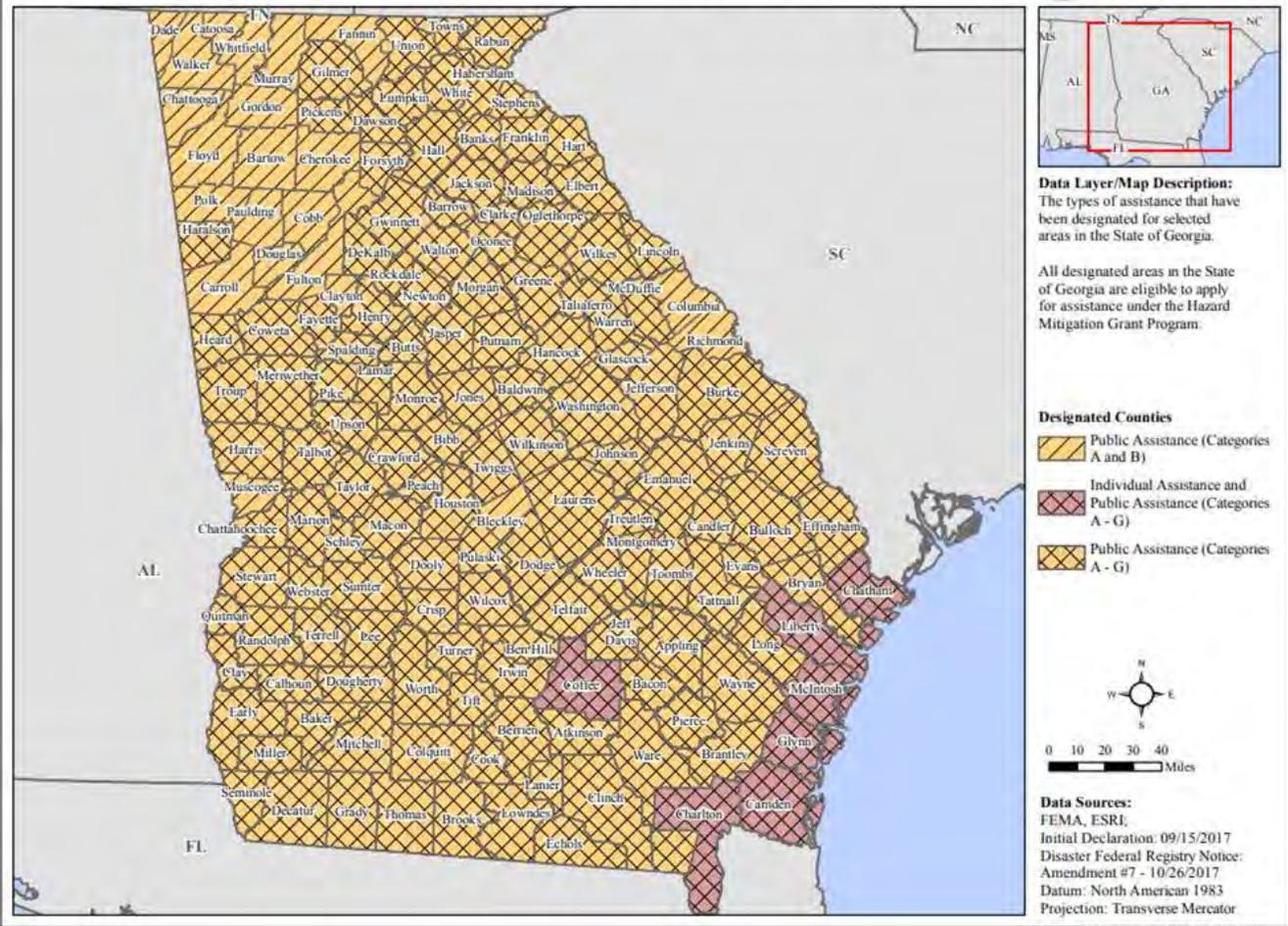


The Disaster Declaration for the severe storms, tornadoes, and straight-line winds occurring on January 2, 2017 is shown in the figure above. Dougherty County was deemed eligible for Public Assistance and Individual Assistance.

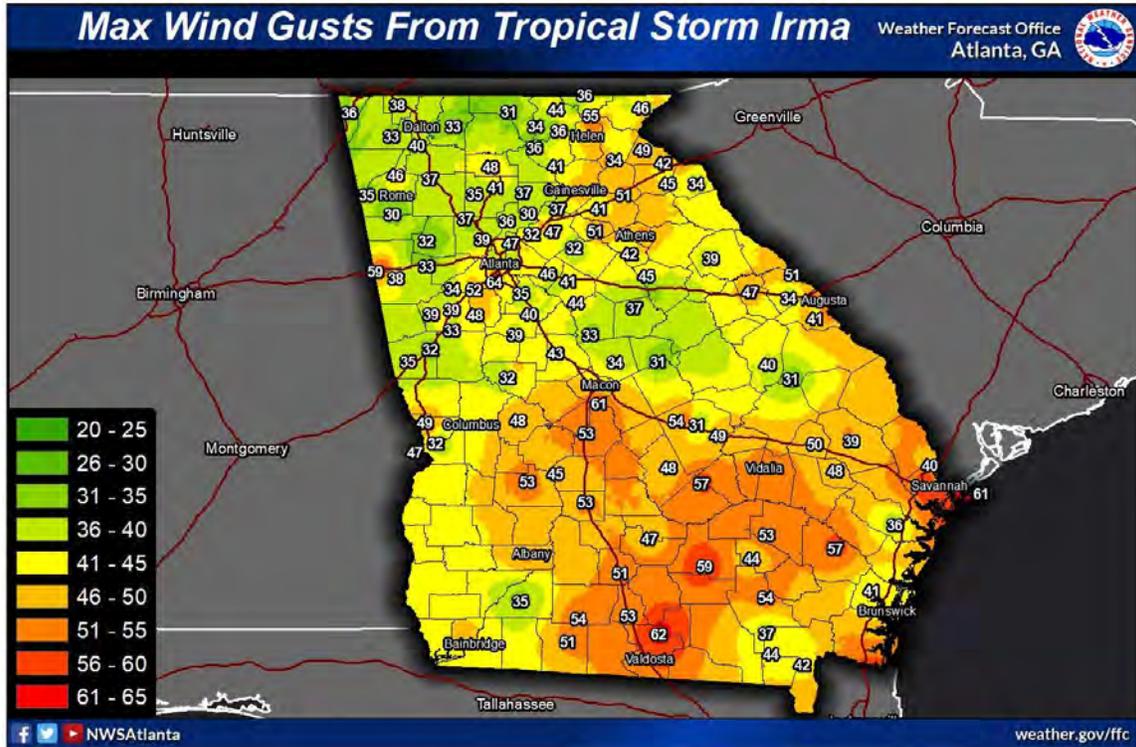


An image depicting the Disaster Declaration for the severe storms, tornadoes, and straight-line winds occurring on January 21-22, 2017 can be seen in the image above. The following counties were deemed eligible to receive Individual and Public Assistance: Berrien, Cook, Crisp, Dougherty, Thomas, Turner, Wilcox, and Worth.

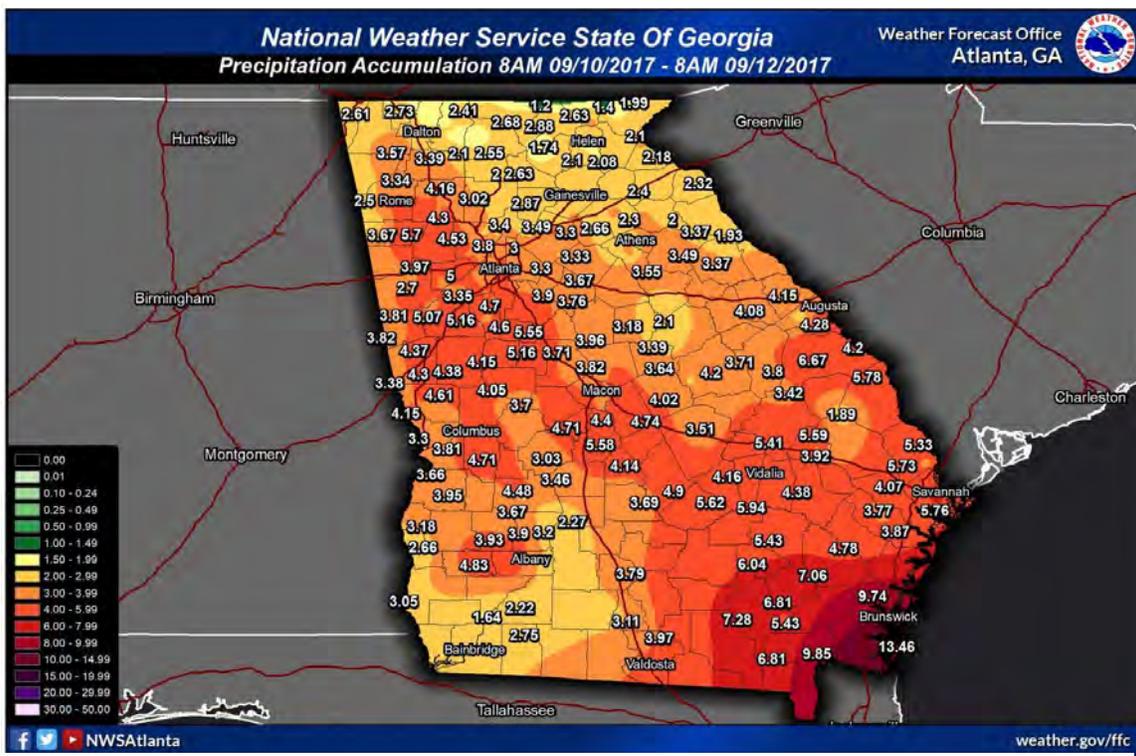
FEMA-4338-DR, Georgia Disaster Declaration as of 10/26/2017



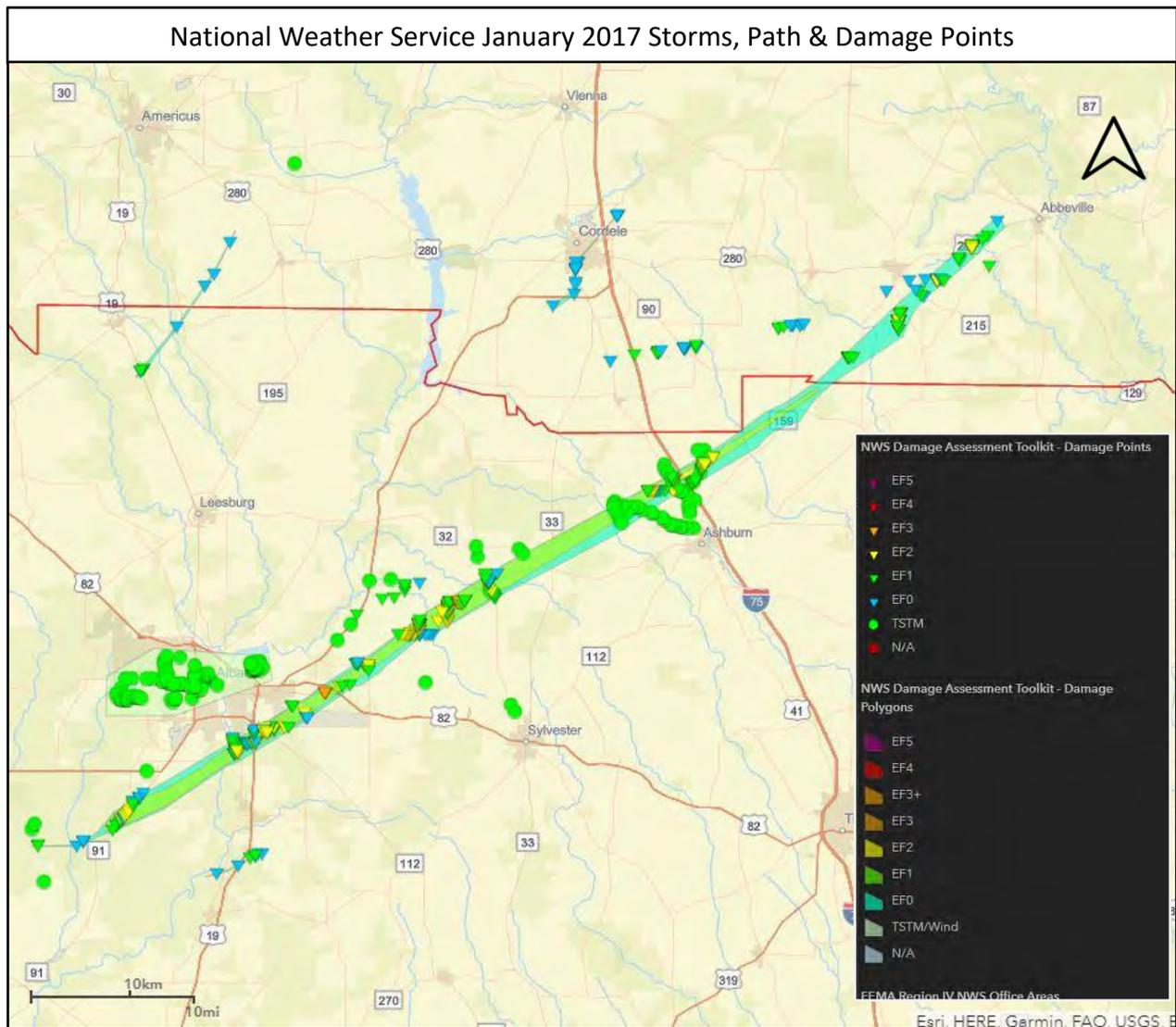
An image depicting the Disaster Declaration for Hurricane Irma occurring in September 2017 can be seen above. The following counties were deemed eligible to receive Individual and Public Assistance: Camden, Charlton, Chatham, Coffee, Glynn, Liberty, and McIntosh.



The figure above shows max wind gusts in Georgia resulting from Tropical Storm Irma. Southern Georgia and Southeast Georgia experienced the greater wind gusts.



The figure above shows precipitation accumulation in Georgia as a result of Hurricane Irma. Coastal Georgia experienced the highest amounts of precipitation with Camden and Glynn Counties receiving the most rain.



The image above shows the path and damage points for the storms occurring in January 2017. This information and graphic was obtained from the National Weather Service Damage Assessment Dashboard.

2B: Targeting Priority Needs

Through partnerships with the affected local city and county governments, the state has composed a comprehensive plan that seeks to address unmet needs. The Georgia CDBG-DR program constructed an index value to prioritize and determine the amount of funding that will be made available to grantees in order to fulfill unmet needs. The index was created by utilizing census, SOVI, FEMA, SBA, and HUD data.

Utilizing the social vulnerability index (SoVI) in concert with FEMA damage data provides a standardized, replicable, and pragmatic process for understanding where resources would be most helpful in driving successful disaster recovery. While overlaying the FEMA and SOVI data, DCA's GIS team created a visualization of loss and vulnerability for the state showing densely populated areas such as the cities of Savannah, Albany and Brunswick. These areas appear to have high social vulnerability and were also some of the most impacted areas from the disasters. Populations residing in more rural areas of the state are also characterized by higher levels of social vulnerability. FEMA provided an address list of Individual Assistance (IA) applicants and identified those applicants with a FEMA verified real property (housing) loss.

It is necessary to target resources to heavily impacted and vulnerable areas since they are less able to recover from disasters without outside assistance. Many of those residing in the affected areas suffer from pervasive poverty. The percentage of persons living below the poverty level within the three most impacted zip codes ranges from 13.2-35.0%.³ These residents generally do not have the ability to adequately prepare for, respond to, and rebound from disasters, environmental impacts, shocks, and stresses. Priority needs, as discussed in the unmet needs assessment, are low-to-moderate income persons, seniors, jobless persons, and other vulnerable populations. The comprehensive analysis of Unmet Needs is discussed in great detail in Section 4: Unmet Needs Assessment.

³ City-Data 31705, 31548, 31520

3. Impact and Assessment

3A: Demographic Profile of Most Impacted and Distressed Areas

While many community characteristics across the impacted area are similar to state trends and percentages, there are specific socio-demographic differences. The table below shows a breakdown of socio-economics and demographics for the three most impacted zip codes from the 2017 Disasters. Two of the three most impacted zip codes have higher rates of populations that are not high school graduates, this coupled with more than 30% of households earning less than \$15,000 per year compounds the issue of poverty within zip codes 31520 and 31705. These population estimates were obtained from the U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates.

TOPIC	Zip Code 31520	Zip Code 31548	Zip Code 31705
POPULATION	22,167	20,720	32,979
PERCENTAGE OF POPULATION AGES 65+	15.2%	9.8%	11.4%
MEDIAN AGE	38.2	32.2	31.4
MEDIAN HOUSEHOLD INCOME	\$ 27,444	\$ 52,846	\$ 26,809
HOUSEHOLDS EARNING LESS THAN 15K PER YEAR	30.8%	8.4%	30.4%
POPULATION 18-24 LESS THAN HIGH SCHOOL GRADUATE	24.4%	25.4%	14.2%
HOUSEHOLDS RECEIVING FOOD STAMP BENEFITS IN PAST 12 MONTHS	32.5%	11.2%	33.2%

According to the U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates, there is a high percentage of renters living within the area of impact. In particular, in Dougherty County 54.23% of residents rent while 45.77% own a home. These figures are higher than the state average of 36.4% renter-occupied units and 63.6% owner-occupied units (Table 3 below).

COUNTY	OWNERS	% OWNERS	RENTERS	% RENTERS	TOTAL
BERRIEN	5,058	71.16%	2,050	28.84%	7,108
CAMDEN	10,846	58.13%	7,812	41.87%	18,658
CHARLTON	2,588	74.50%	886	25.50%	3,474
CHATHAM	57,385	53.76%	49,364	46.24%	10,6749
COFFEE	9,308	65.97%	4,802	34.03%	14,110
COOK	4,114	68.81%	1,865	31.19%	5,979
CRISP	4,876	57.30%	3,633	42.70%	8,509
DOUGHERTY	16,090	45.77%	19,066	54.23%	35,156
GLYNN	19,760	60.57%	12,863	39.43%	32,623
LIBERTY	10,368	45.51%	12,412	54.49%	22,780
MCINTOSH	4,116	79.05%	1,091	20.95%	5,207
THOMAS	10,460	60.57%	6,809	39.43%	17,269
TURNER	2,141	69.72%	930	30.28%	3,071
WILCOX	1,955	72.46%	743	27.54%	2,698
WORTH	5,533	70.28%	2,340	29.72%	7,873

The median household income and population estimates for the 15 impacted counties are listed in table 4. Camden County has the highest median household income (\$53,327) and Chatham County has the highest population (290,501). Many counties have less than 20,000 residents and are more rural in nature. All counties, with the exception of Camden, are below the State of Georgia’s median household income (\$51,037).

County	Median Household income	Population estimate
Berrien	\$35,740	19,186
Camden	\$53,327	53,044
Charlton	\$43,871	12,715
Chatham	\$49,596	290,501
Coffee	\$34,536	43,014
Cook	\$35,199	17,277
Crisp	\$31,672	22,736
Dougherty	\$33,605	89,502
Glynn	\$46,475	85,282
Liberty	\$42,484	61,386
McIntosh	\$45,248	14,106
Thomas	\$38,241	44,779
Turner	\$34,667	7,961
Wilcox	\$34,071	8,800
Worth	\$38,684	20,533

3B: Impact on Low and Moderate-Income Populations

The January 2017 tornadoes and Hurricane Irma had a pronounced impact on low and moderate income (LMI) households within the 15 counties eligible for FEMA Individual Assistance. HUD requires that at a minimum, 70% of the total CDBG-DR funds benefit households of low to moderate income. LMI limits are determined by HUD based on the Area Median Income of the county and are categorized by number of persons in the family. Low to moderate income households are defined as households that do not exceed 80% of the area median income for their area, as determined by HUD. These income categories are grouped into the following classifications:

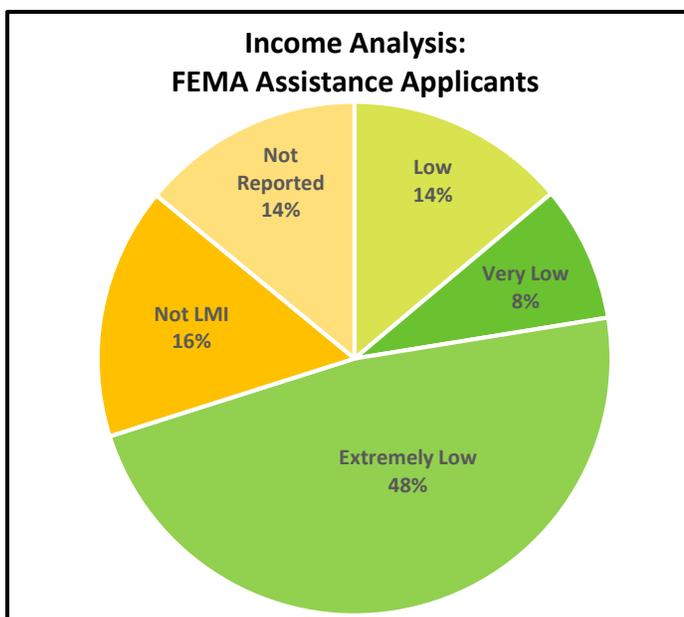
Extremely Low income	Annual income at 30% or below the area median income
Very low income	Annual income at 31% to 50% of the area median income
Low income	Annual income at 51% to 80% of the area median income.

Table 5 displays the HUD-defined income limits for determining qualified LMI households for a 4-person household. Limits for one to eight person households is located within the appendix.

Table 5: 2017 4-Person Income Limit			
County	Extremely Low <30% AMI	Very Low <50% AMI	Low <80% AMI
Berrien	\$23,250	\$23,250	\$37,200
Camden	\$24,600	\$31,050	\$49,700
Charlton	\$24,600	\$27,400	\$43,850
Chatham	\$24,600	\$32,450	\$51,900
Coffee	\$23,250	\$23,250	\$37,200
Cook	\$23,250	\$23,250	\$37,200
Crisp	\$23,250	\$23,250	\$37,200
Dougherty	\$23,650	\$23,650	\$37,850
Glynn	\$24,600	\$27,450	\$43,900
Liberty	\$24,600	\$26,250	\$42,000
McIntosh	\$24,600	\$27,450	\$43,900
Thomas	\$23,250	\$23,250	\$37,200
Turner	\$23,250	\$23,250	\$37,200
Wilcox	\$23,250	\$23,250	\$37,200
Worth	\$23,650	\$23,650	\$37,850

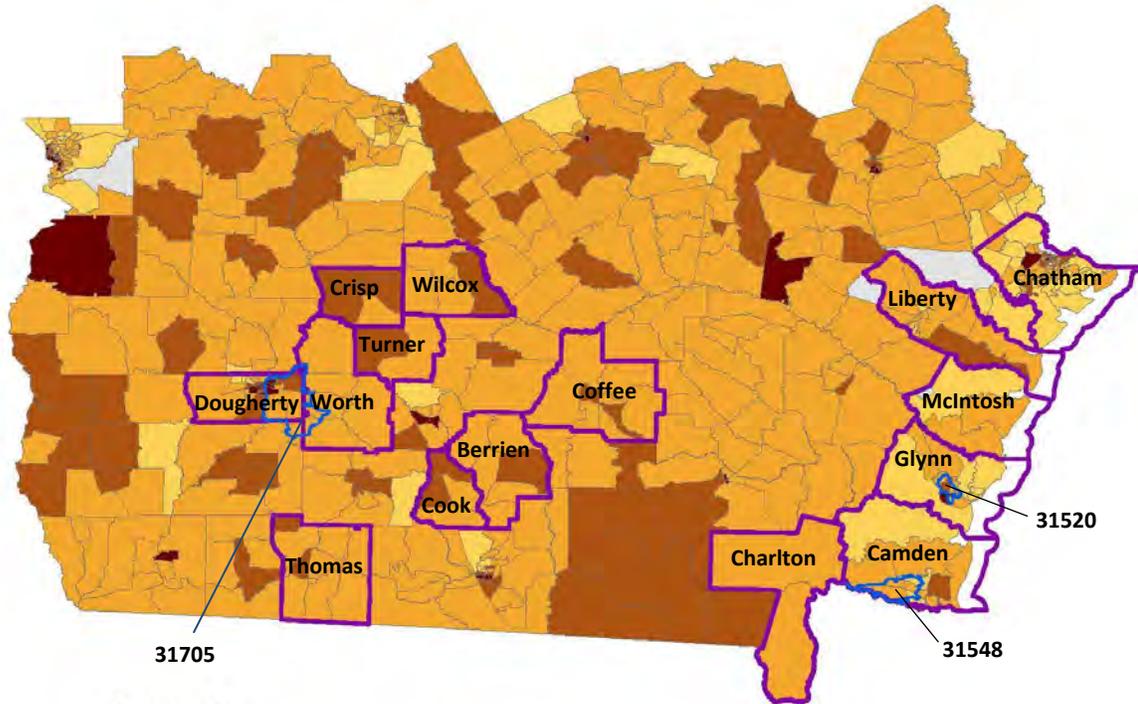
Following a major disaster, households who qualify as either low or moderate income are likely to have increased difficulty securing financing for necessary repairs, replacing damaged personal property, finding suitable rental housing, or paying for temporary housing or relocation expenses.

As such, DCA has worked to identify impacted areas with concentrations of Low and Moderate income households in order to prioritize assistance for those with greatest need. The figure (right) illustrates the income breakdown of residents within the 15 IA declared counties which applied for FEMA assistance. It is evident that significant housing damages occurred in areas having concentrations of LMI residents. Of the nearly 50,000 applicants, 48% are considered extremely low income, 8% very low income, and 14% low income. Also, 16% of applicants were considered not low income and 14% did not disclose their income.



The maps on the following pages illustrate poverty within the affected counties and most impacted zip codes, the percentages of low and moderate income households within the affected counties and most impacted zip codes for Disaster 4294, 4297, and 4338. Lastly, a map of the percentage of unemployed persons within the affected counties and impacted zip codes is provided on page 21.

Percentage of Persons Below Poverty



Legend

3 most impacted zip codes

Impacted county

Poverty

No data

Less than 9.9%

10% - 29.9%

30% - 44.9%

45% - 94.4%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.

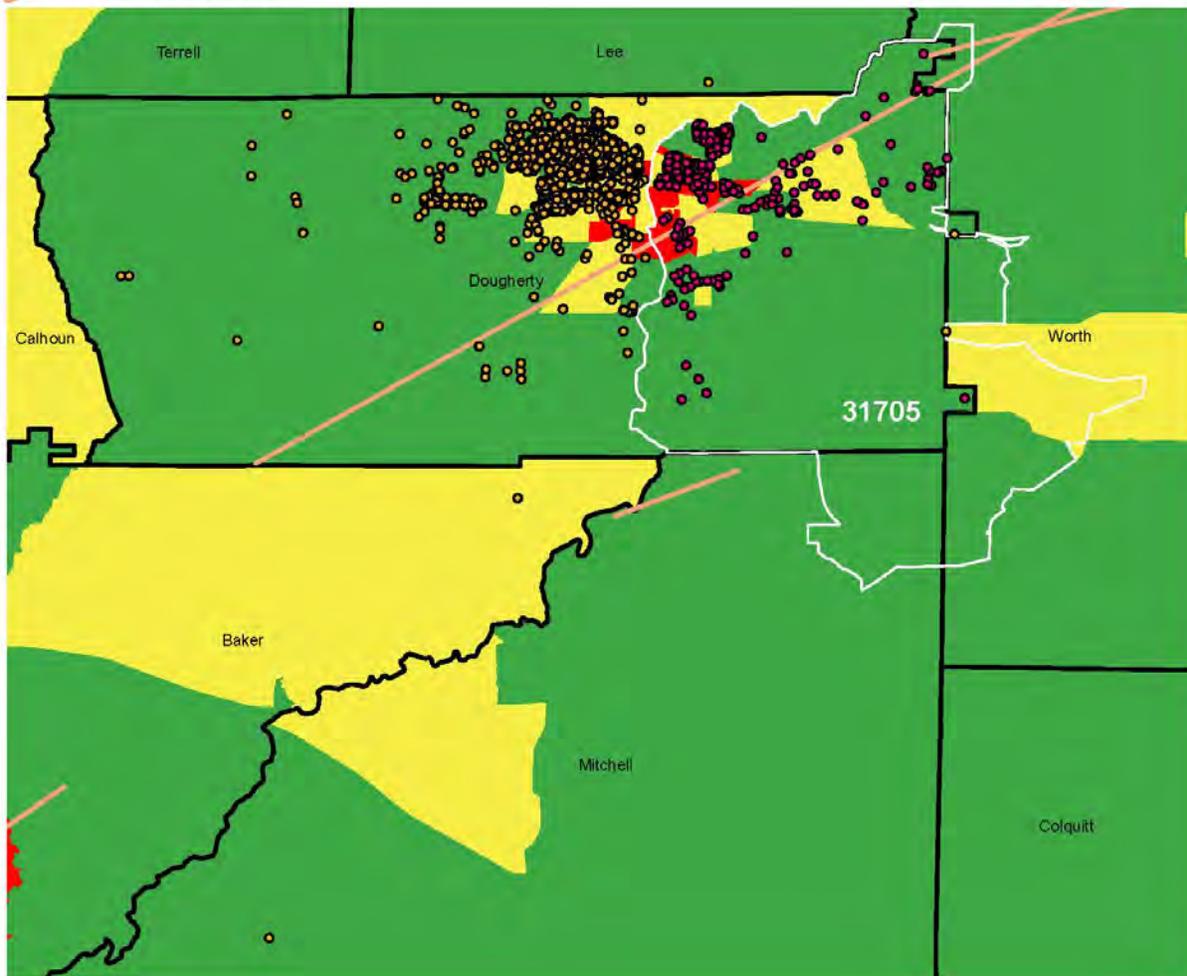
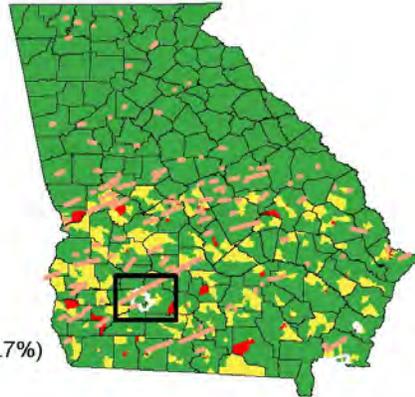


The figure above displays the levels of poverty in the southern portion of the State of Georgia. Within the 15 affected counties, there are areas within many counties which exhibit high levels of poverty. In fact, there are few areas that have less than 9.9% poverty. Almost all counties have at least one census tract that exhibits a level of poverty between 30% and 44.9%. Chatham, Dougherty, and Glynn Counties have census tracts that fall in the highest level of poverty, between 45% and 94.4%. Portions of zip codes 31520 and 31705 also fall within the highest poverty ranking.

Number of Applicants for DR- 4294

% of Low & Moderate Income Households in Block Group

- Greater than 75.0% : 291 damaged properties (40.25%)
- 51.0% - 74.9% : 280 damaged properties (38.73%)
- Less than 51.0% : 152 damaged properties (21.02%)
- Within Most Impacted Zip Codes: 723 damaged properties (20.3%)
- Not Within Most Impacted Zip Codes: 2,837 damaged properties (79.7%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017

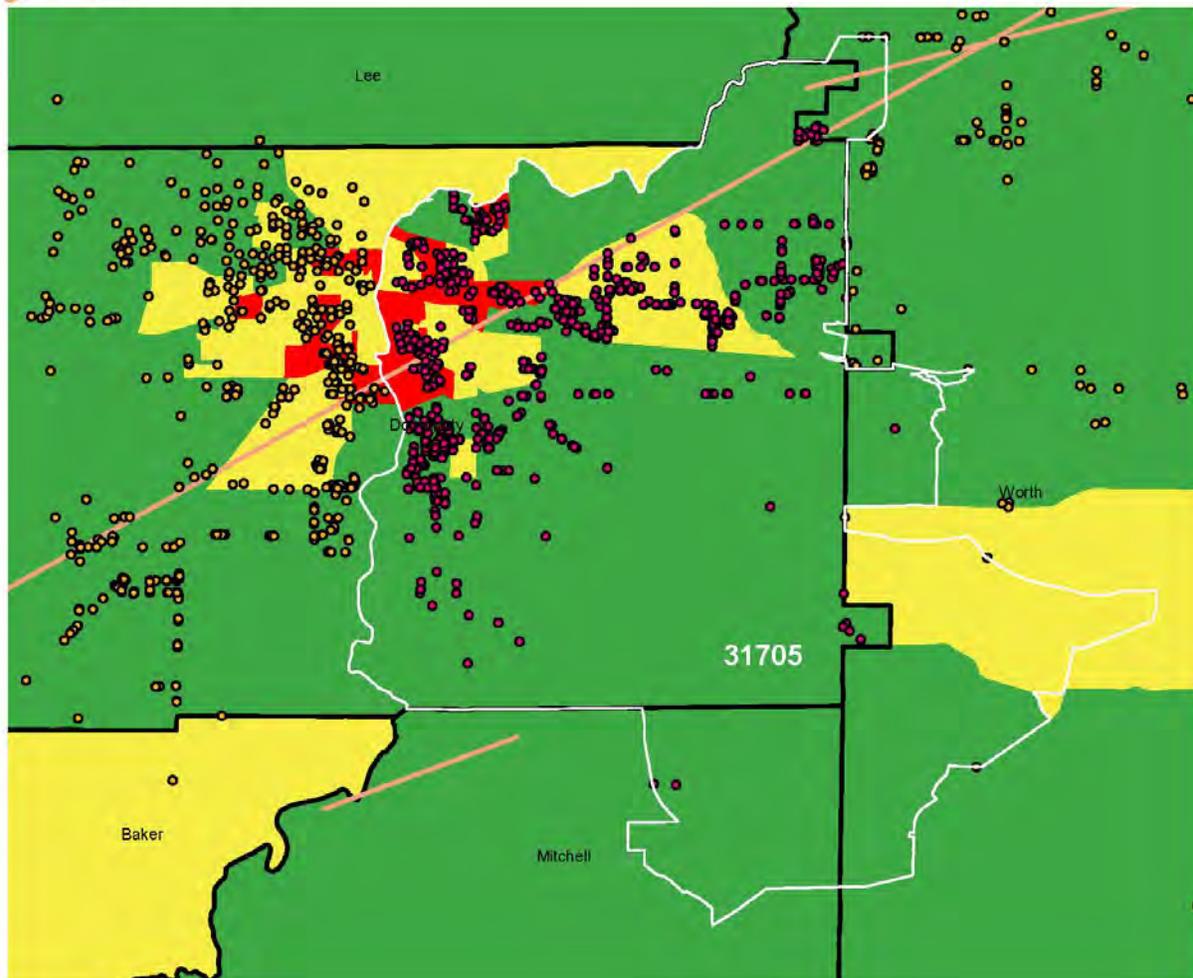
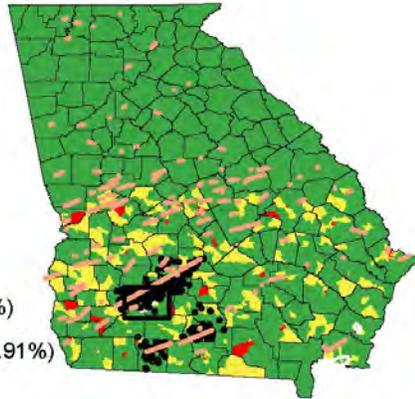


The figure above indicates 291 properties experienced storm-related damage from Disaster 4294 within block groups where greater than 75% of the households are low to moderate income. Additionally, 280 properties were damaged in areas where 51% to 74.9% of the households are low to moderate income. Lastly, 152 properties were damaged in areas where less than 51% of the households have low to moderate income. As seen above, many properties with damage are located within and adjacent to zip code 31705.

Number of Applicants for DR- 4297

% of Low & Moderate Income Households in Block Group

- Greater than 75.0% : 106 damaged properties (6.29%)
- 51.0% - 74.9% : 570 damaged properties (33.83%)
- Less than 51.0% : 1,009 damaged properties (59.88%)
- Within Most Impacted Zip Codes: 1,685 damaged properties (49.09%)
- Not Within Most Impacted Zip Codes: 1,747 damaged properties (50.91%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017

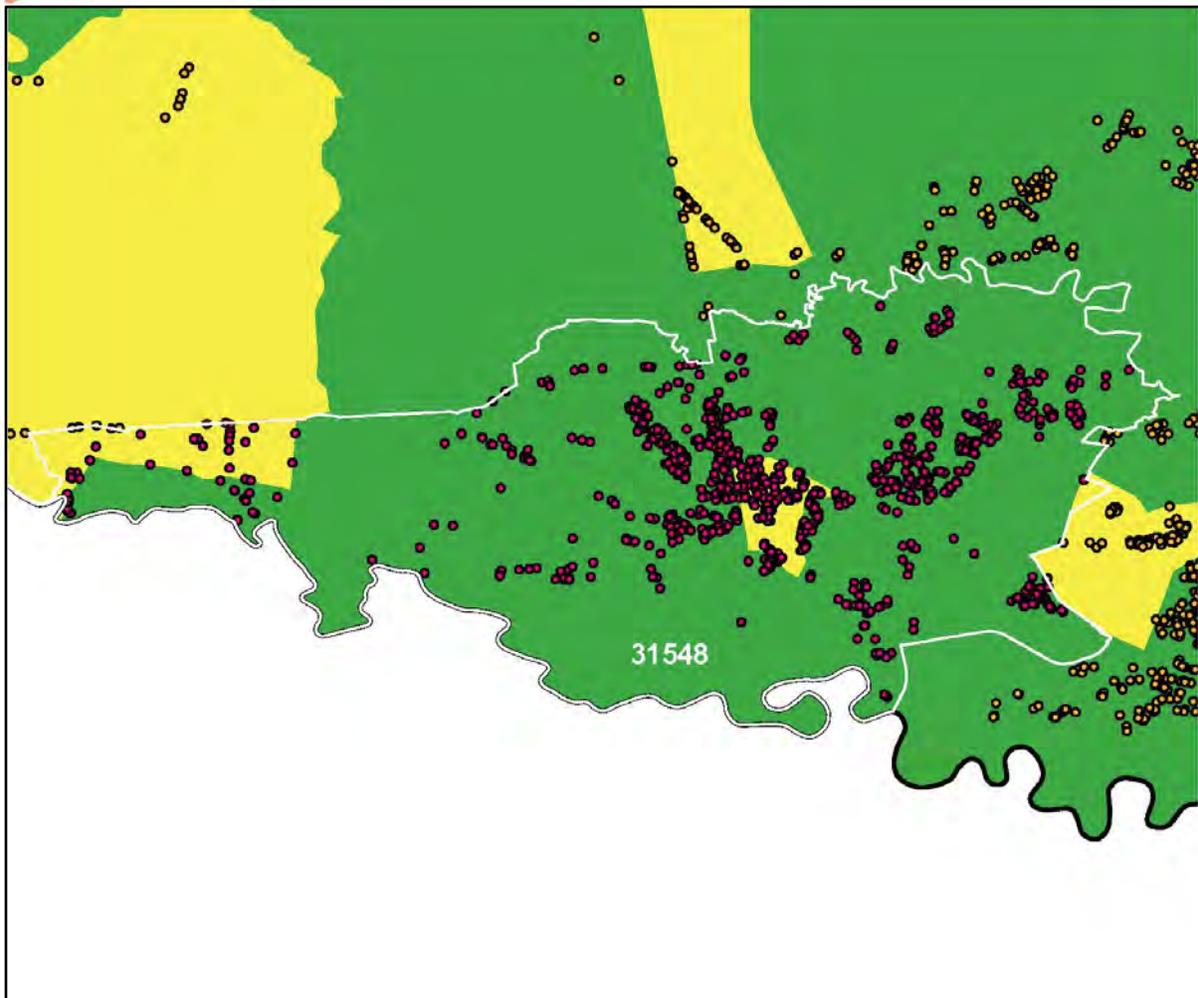
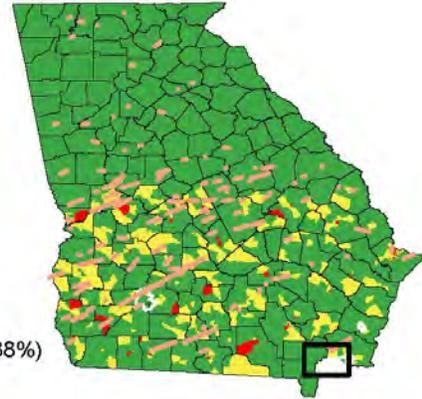


The figure above displays properties damaged by DR 4297. There were 1,685 properties damaged within zip code 31705. Of those, 106 properties were damaged within block groups where greater than 75% of the households are low to moderate income. Furthermore, 570 properties were damaged in areas where 51% to 74.9% of the households are low to moderate income. Lastly, 1,009 properties were damaged in areas where less than 51% of the households have low to moderate income.

Number of Applicants for DR- 4338

% of Low & Moderate Income Households in Block Group

- Greater than 75.0% : 0 damaged properties (0%)
- 51.0% - 74.9% : 383 damaged properties (17.83%)
- Less than 51.0% : 1,764 damaged properties (82.17%)
- Within Most Impacted Zip Code: 2,147 damaged properties (4.12%)
- Not Within Most Impacted Zip Code: 50,027 damaged properties (95.88%)
- Zip Code 31548 (Camden)
- Storm Paths in 2017

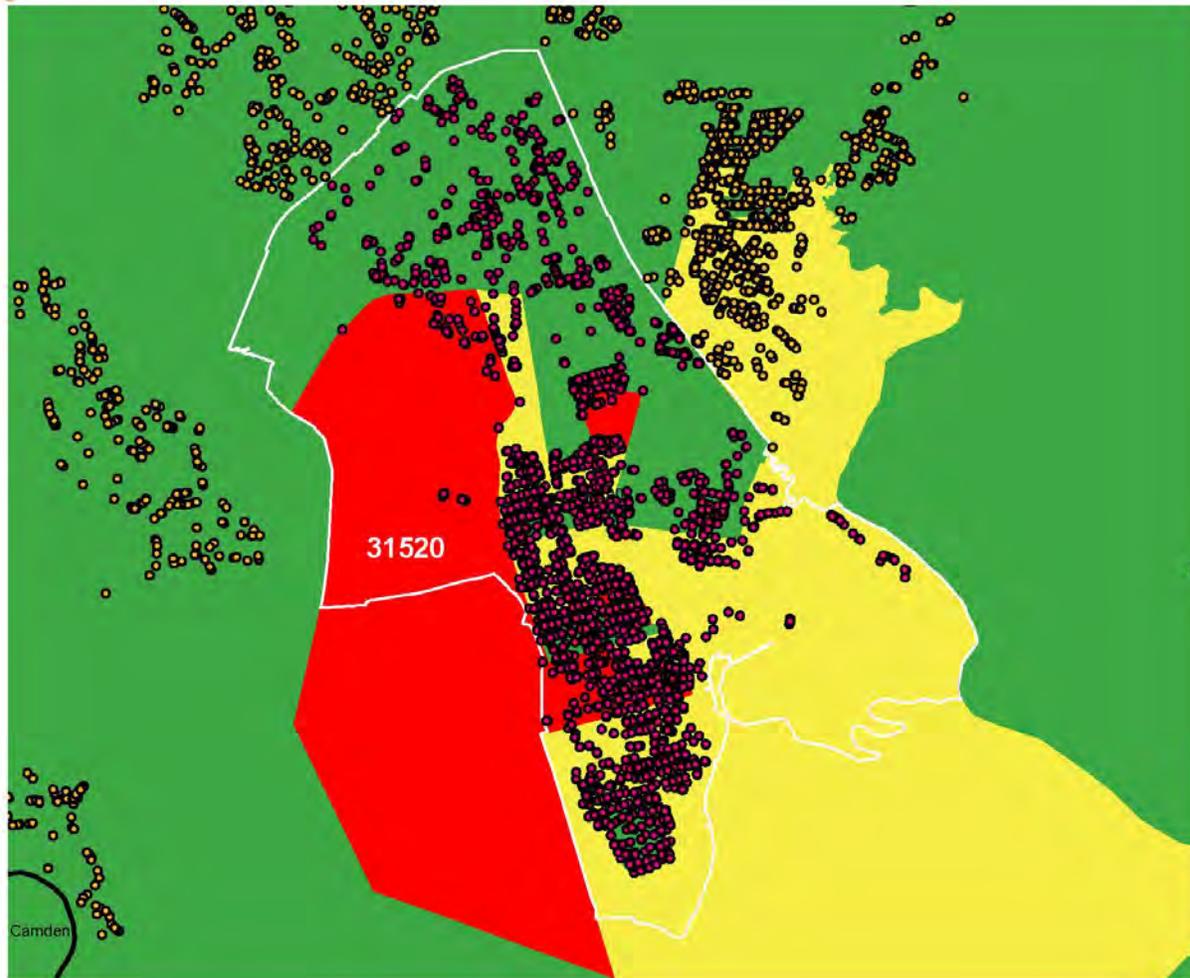
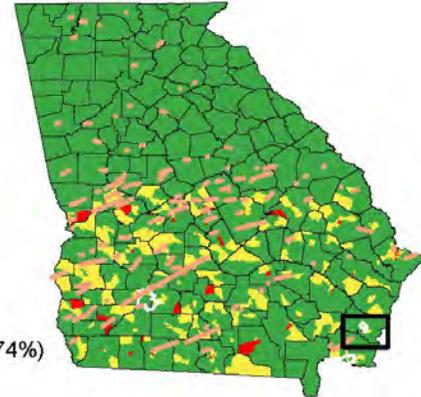


The map above indicates 383 properties experienced storm-related damage from Hurricane Irma, also known as Disaster 4338, within block groups where 51% to 74.9% of the households have low to moderate income. The disaster caused damage to 1,764 properties in areas where less than 51% of the households have low to moderate income. This damage occurred within zip code 31548 which is located within Camden County.

Number of Applicants for DR- 4338

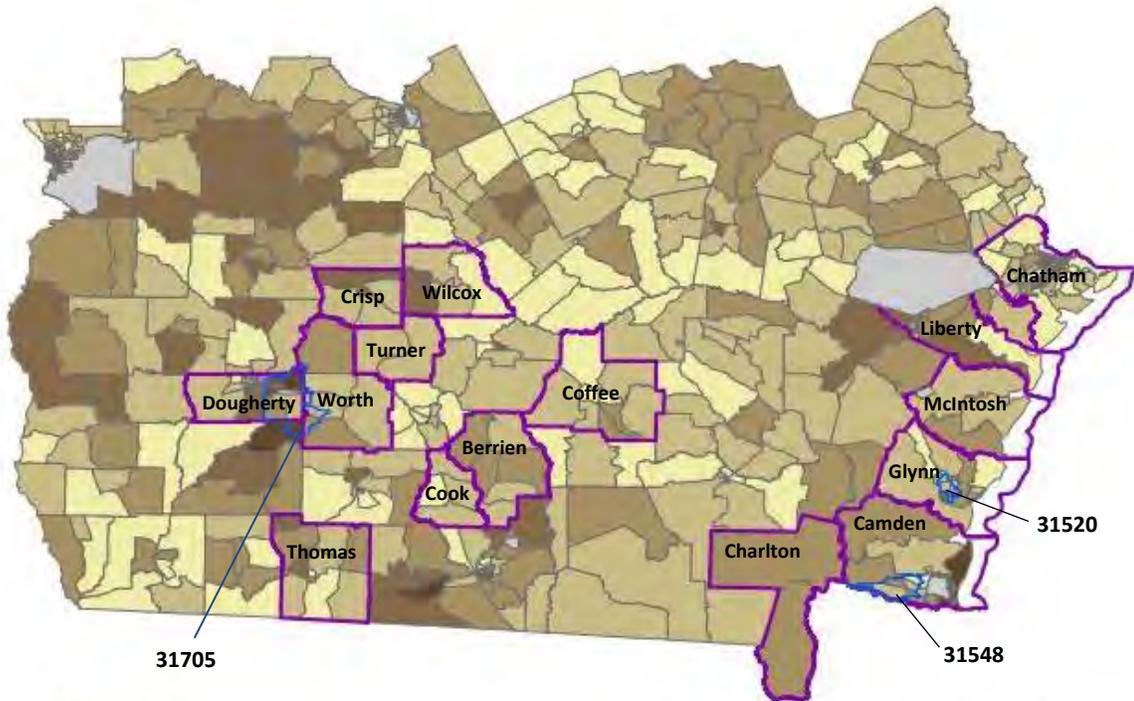
% of Low & Moderate Income Households in Block Group

- Greater than 75.0% : 861 damaged properties (17.85%)
- 51.0% - 74.9% : 2,275 damaged properties (47.16%)
- Less than 51.0% : 1,688 damaged properties (34.99%)
- Within Most Impacted Zip Code: 4,824 damaged properties (9.26%)
- Not Within Most Impacted Zip Code: 47,350 damaged properties (90.74%)
- Zip Code 31520 (Glynn)
- Storm Paths in 2017



The map above indicates 861 properties experienced storm-related damage from Hurricane Irma, also known as Disaster 4338, within block groups where greater than 75% of the households have low to moderate income. Additionally, 2,275 properties were damaged in areas where 51% to 74.9% of the households are low to moderate income. The disaster also caused damage to 1,688 properties in areas where less than 51% of the households have low to moderate income. This damage occurred within zip code 31520 which is located within Glynn County.

Percentage of Unemployed



Legend

- 3 most impacted zip codes
 - Impacted county
 - Military installation
- % Unemployment (civilian, age 16+)**
- 0% - 5%
 - 6% - 10%
 - 11% - 15%
 - 16% - 25%
 - 26% - 37%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

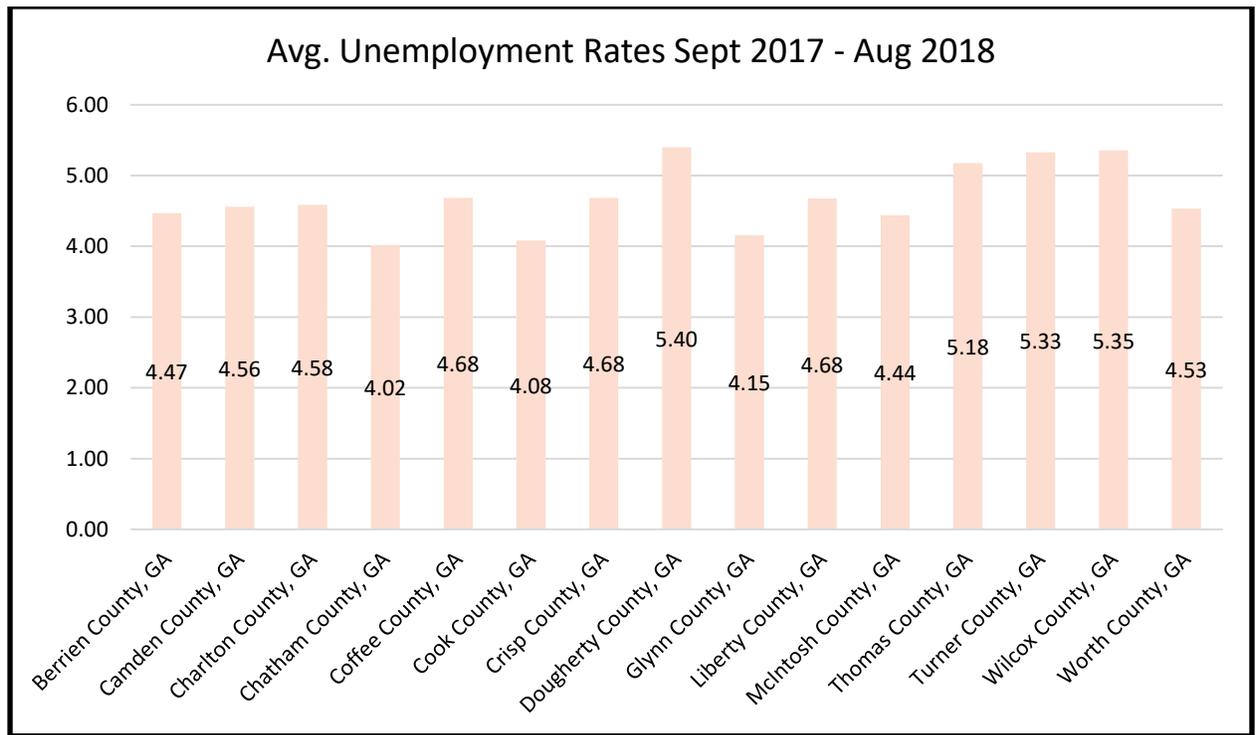
ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event. The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.



The map above illustrates the larger concentrations of unemployment across the area. As can be seen from the map, the affected counties were dealing with high unemployment rates even before disaster struck. These communities are rural in nature and have not taken part in the sweeping economic recovery that has taken place nationwide since the Great Recession. These populations are less likely to have access to the resources needed to fully recover from disaster, especially when they were barely making ends meet before property damage affected their homes and community. As seen above, many communities have high levels of unemployment. Dougherty and Camden counties have census tracts with the highest level of unemployment, 26% - 37%.

The unemployment rates vary by county and month. Table 6 includes unemployment rates by county from August 2017 to August 2018. The data was obtained from the Bureau of Labor Statistics. The rates that are light green in color are higher than or equal to the state average, and the rates colored orange have the highest rate within the affected area for that month. It is important to note, Dougherty, Thomas, Turner and Wilcox Counties had unemployment rates higher than the state average ALL twelve months of the past year.

Table 6: Unemployment by County													
County	Aug 2017	Sept 2017	Oct 2017	Nov 2017	Dec 2017	Jan 2018	Feb 2018	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018
Berrien	5.3	4.8	4.7	4.5	4.5	4.9	4.8	4.4	3.8	3.7	4.5	4.2	4
Camden	5.3	5.1	4.8	4.6	4.6	4.7	4.9	4.6	4	3.8	4.5	4.3	4.1
Charlton	5.6	4.9	4.7	4.6	4.9	5.2	4.9	4.6	3.9	3.8	4.5	4.2	3.8
Chatham	4.7	4.3	4.2	4	4.1	4.3	4.2	3.9	3.5	3.4	4.1	3.8	3.7
Coffee	4.9	4.5	4.4	4.5	4.9	6.3	5.3	4.8	4.2	3.9	4.6	4.5	4.1
Cook	4.8	4.5	4.1	3.9	4.2	4.4	4.4	4	3.5	3.4	4.3	4	3.6
Crisp	5.4	4.8	4.9	4.6	4.6	5.3	5	4.6	4.2	4	4.7	4.5	4.3
Dougherty	6.5	5.8	5.6	5.4	5.3	5.6	5.6	5.2	4.8	4.6	5.5	5.3	5
Glynn	4.7	6.3	4.5	4.1	4.2	4.3	4.3	3.9	3.4	3.3	3.9	3.6	3.5
Liberty	5.3	5	4.8	4.7	4.9	5.1	5	4.7	4.2	4	4.6	4.4	4.1
McIntosh	5.2	5.8	4.8	4.3	4.5	4.7	4.7	4.4	3.7	3.7	4.2	4	3.7
Thomas	6.2	5.7	5.6	5.5	5.4	5.6	5.4	5	4.4	4.3	5	4.8	4.4
Turner	5.8	5.4	5.2	5.1	5.3	6.5	6.2	5.2	4.7	4.6	5.3	4.9	5.1
Wilcox	6.1	5.5	5.9	5.3	5.3	6.1	5.8	5	4.5	4.4	5	5.8	4.9
Worth	5.1	4.6	4.6	4.5	4.7	4.8	4.7	4.4	4	4	4.7	4.5	4.3
State Average	4.5	4.5	4.5	4.5	4.5	4.5	4.4	4.4	4.3	4.2	4.1	3.9	3.8



3C: Vulnerable Populations

Social vulnerability was utilized by the Georgia Community Department of Community Affairs to identify target areas that require outside assistance to rebound from this disaster. The Social Vulnerability Index (SoVI) utilizes the most recent census data (2011-15) to measure the social vulnerability of all census tracts in areas of interest. The index is instrumental in targeting resources to those who are in most need during recovery and rebuilding operations following the 2017 disasters. These measures provided an approach for distributing scarce disaster recovery dollars and rebuilding resources for the most benefit to the impacted areas that are least able to recover from these disasters. SVI scores for the impacted counties can be seen in Table 7.

Table 7: SVI Scores					
COUNTY	Overall SVI Score	Socioeconomic	Household Composition/ Disability	Minority Language	Housing/Transportation
Berrien	0.8103	0.9344	0.7498	0.5788	0.4056
Camden	0.5540	0.4798	0.4467	0.5842	0.6523
Charlton	0.7775	0.9029	0.0850	0.8768	0.6683
Chatham	0.6858	0.5349	0.2639	0.8526	0.8424
Coffee	0.9475	0.8698	0.7978	0.8462	0.9395
Cook	0.8217	0.8259	0.8647	0.7093	0.4674
Crisp	0.9831	0.9449	0.9567	0.7813	0.9446
Dougherty	0.9414	0.9268	0.7985	0.7237	0.9019
Glynn	0.7851	0.5294	0.8389	0.8147	0.8045
Liberty	0.8106	0.7170	0.6323	0.8599	0.6988
McIntosh	0.5817	0.7650	0.8691	0.5005	0.0958
Thomas	0.8984	0.8160	0.9303	0.7380	0.7491
Turner	0.9984	0.9472	0.9971	0.8676	0.9726
Wilcox	0.8169	0.8854	0.3251	0.7017	0.7342
Worth	0.7784	0.8211	0.8790	0.6036	0.3859

The index seeks to show and strategically account for uneven capacity for preparedness and response, and helps pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery and where other market forces are less likely to be awarded other support. Possible SVI scores range from 0-1. A zero score means the community has the lowest vulnerability and a score of 1 indicates the highest vulnerability. Within the affected area, Turner County has the highest SVI score with .9984, Crisp County has a score of .9831, Coffee County has a score of .9475, and Dougherty County has a score of .9414. McIntosh and Camden County have the lowest scores of .5817 and .5540, respectively.

The social vulnerability index synthesizes socioeconomic variables, which the research suggests contribute to reduction in a community’s ability to prepare for, respond to, and recover from hazards. An outline of the variables influential in vulnerability for recovering from the three 2017 disasters and the data used in the SVI index is shown in the table below.

Table 8: Component Scores and Composite Social Vulnerability Scores										
COUNTY	POPULATION	POVERTY	PERCENT	PCI Benchmark	Percent Benchmark	Poverty Benchmark	PCI Score	Percent Score	Poverty Score	Demo Total Score
Berrien	18,808	4,811	25.58%	\$9,688.00	41.41%	48,550	22.79	24.71	3.96	51.46
Camden	50,293	7,029	13.98%	\$9,688.00	41.41%	48,550	15.90	13.50	5.79	35.19
Charlton	11,757	2,420	20.58%	\$9,688.00	41.41%	48,550	20.73	19.88	1.99	42.61
Chatham	269,919	48,550	17.99%	\$9,688.00	41.41%	48,550	14.24	17.37	40.00	71.62
Coffee	39,265	9,618	24.50%	\$9,688.00	41.41%	48,550	21.46	23.66	7.92	53.04
Cook	16,887	4,429	26.23%	\$9,688.00	41.41%	48,550	22.06	25.33	3.65	51.05
Crisp	22,587	7,439	32.93%	\$9,688.00	41.41%	48,550	19.43	31.81	6.13	57.37
Dougherty	88,450	26,982	30.51%	\$9,688.00	41.41%	48,550	18.99	29.47	22.23	70.69
Glynn	81,134	15,177	18.71%	\$9,688.00	41.41%	48,550	13.93	18.07	12.50	44.50
Liberty	61,676	10,443	16.93%	\$9,688.00	41.41%	48,550	19.31	16.36	8.60	44.27
McIntosh	13,847	2,788	20.13%	\$9,688.00	41.41%	48,550	16.26	19.45	2.30	38.01
Thomas	44,017	9,377	21.30%	\$9,688.00	41.41%	48,550	17.47	20.58	7.73	45.78
Turner	7,802	2,157	27.65%	\$9,688.00	41.41%	48,550	22.60	26.71	1.78	51.08
Wilcox	6,814	1,422	20.87%	\$9,688.00	41.41%	48,550	26.66	20.16	1.17	47.99
Worth	20,807	3,837	18.44%	\$9,688.00	41.41%	48,550	19.31	17.81	3.16	40.28

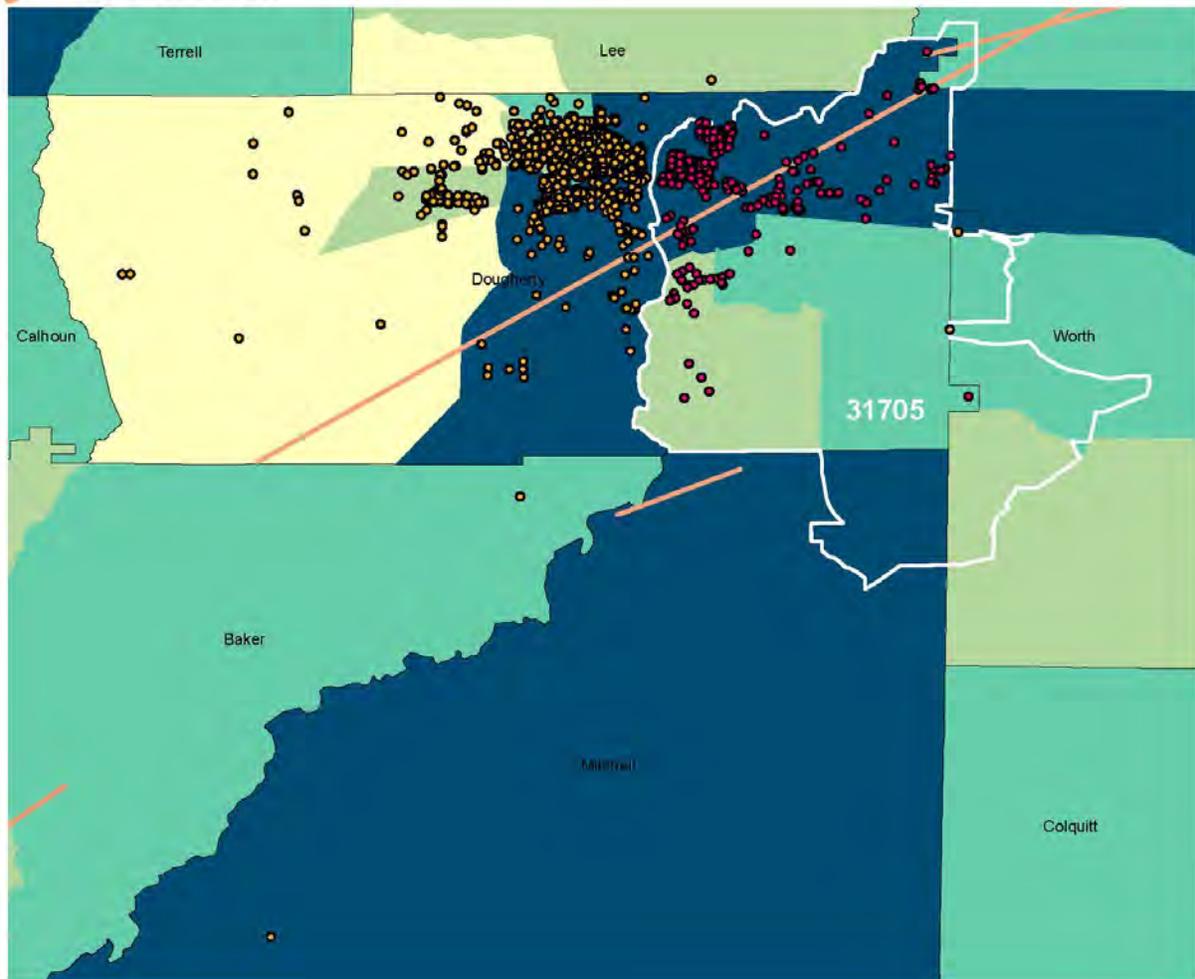
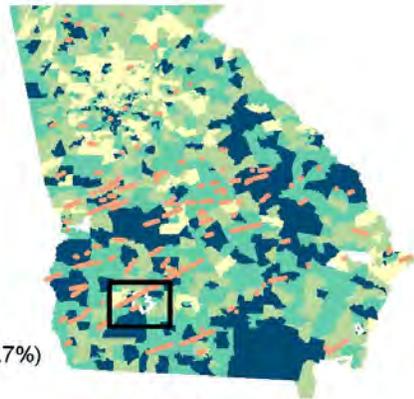
Notes: Component scores and composite social vulnerability scores are relative and comparable across the State of Georgia. The cardinalities of components have been adjusted as indicated above. The social vulnerability composite score is obtained by summing all component scores. Input data are derived from the Five-Year American Community Survey, 2011-15.

The maps on the following pages illustrate the SVI data for the counties impacted by the 2017 tornadoes and Hurricane Irma.

Number of Applicants for DR- 4294

Social Vulnerability Index

- Highest (Top 4th) : 670 damaged properties (92.66%)
- Higher Middle 4th : 30 damaged properties (4.14%)
- Lower Middle 4th : 23 damaged properties (3.2%)
- Lowest (Bottom 4th) : 0 damaged properties (0%)
- Within Most Impacted Zip Codes: 723 damaged properties (20.3%)
- Not Within Most Impacted Zip Codes: 2.837 damaged properties (79.7%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017

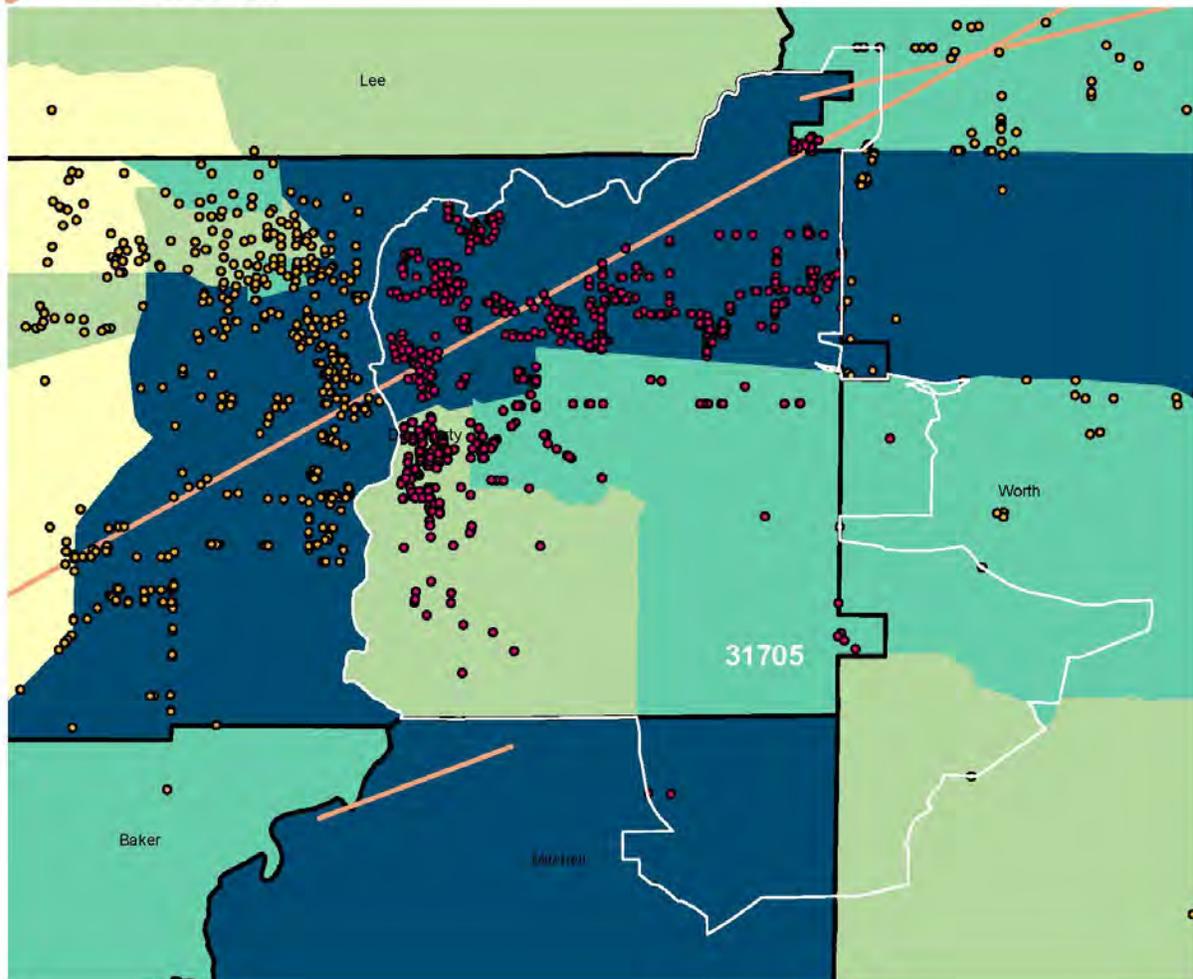
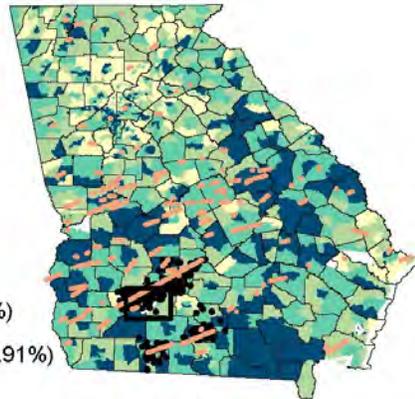


Disaster 4294 - As seen in the figure above, 92.66% of damaged properties in zip code 31705 are located in areas considered to be the most vulnerable. Additionally, the remaining 4.14% and 3.2% of damaged properties occurred in the higher middle and lower middle vulnerable areas, respectively. To note, there were zero damaged properties located within the lowest social vulnerable category.

Number of Applicants for DR- 4297

Social Vulnerability Index

- Highest (Top 4th) : 913 damaged properties (54.18%)
- Higher Middle 4th : 376 damaged properties (22.31%)
- Lower Middle 4th : 396 damaged properties (23.51%)
- Lowest (Bottom 4th) : 0 damaged properties (0%)
- Within Most Impacted Zip Codes: 1,685 damaged properties (49.09%)
- Not Within Most Impacted Zip Codes: 1,747 damaged properties (50.91%)
- Zip Code 31705 (Dougherty, Mitchell, Worth)
- Storm Paths in 2017

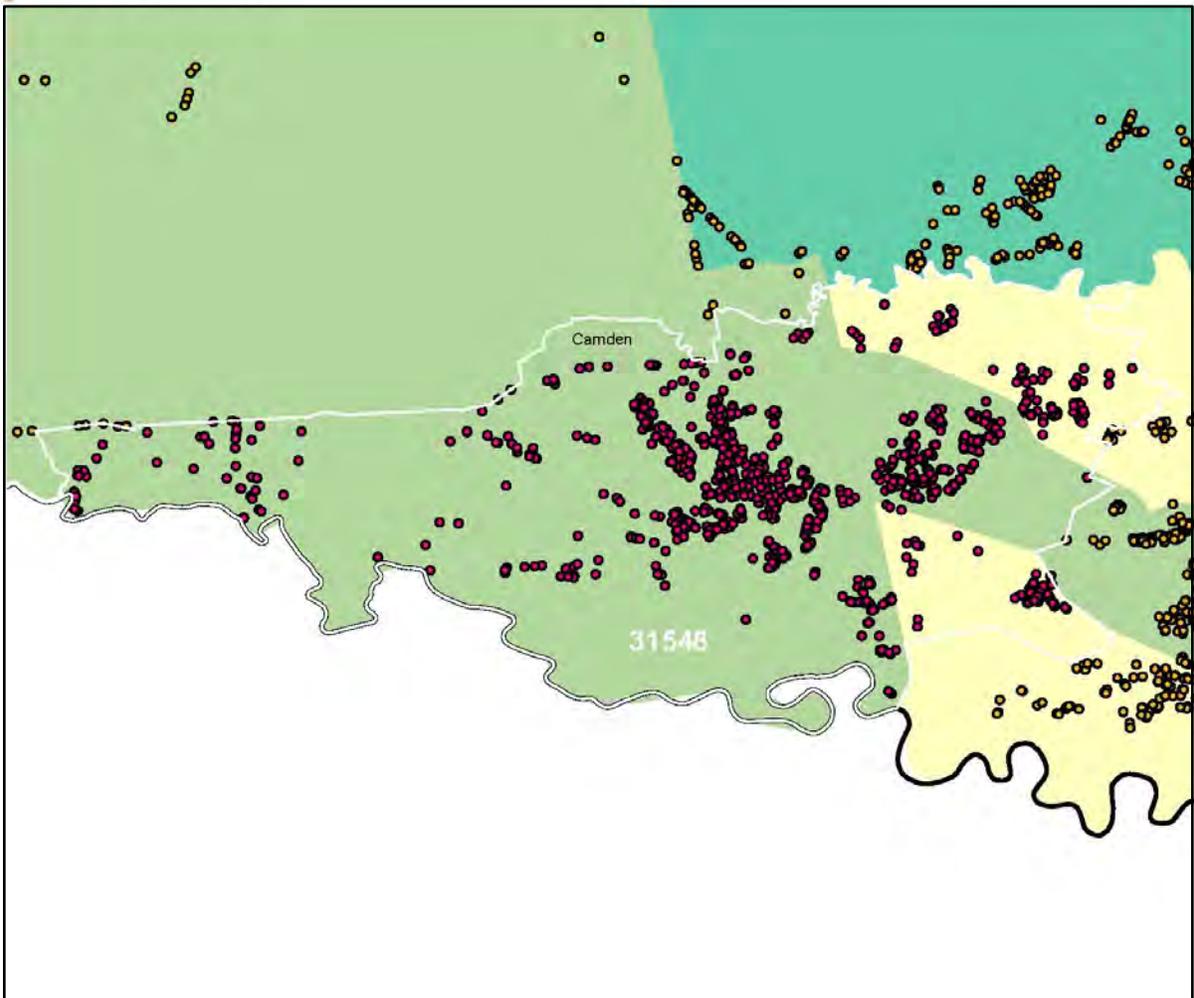
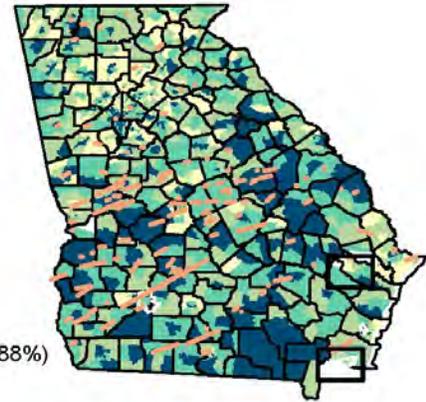


Disaster 4297 - As seen in the figure above, 54.18% of damaged properties in zip code 31705 are located in areas considered to be the most vulnerable. Additionally, the remaining 22.31% and 23.51% of damaged properties occurred in the higher middle and lower middle vulnerable areas, respectively. Many of the areas within zip code 31705 are socially vulnerable, as a result zero damaged properties were located within the lowest social vulnerable category.

Number of Applicants for DR- 4338

Social Vulnerability Index

- Highest (Top 4th) : 0 damaged properties (0%)
- Higher Middle 4th : 0 damaged properties (0%)
- Lower Middle 4th : 1,950 damaged properties (90.82%)
- Lowest (Bottom 4th) : 197 damaged properties (9.18%)
- Within Most Impacted Zip Code: 2,147 damaged properties (4.12%)
- Not Within Most Impacted Zip Code: 50,027 damaged properties (95.88%)
- Zip Code 31548 (Camden)
- Storm Paths in 2017

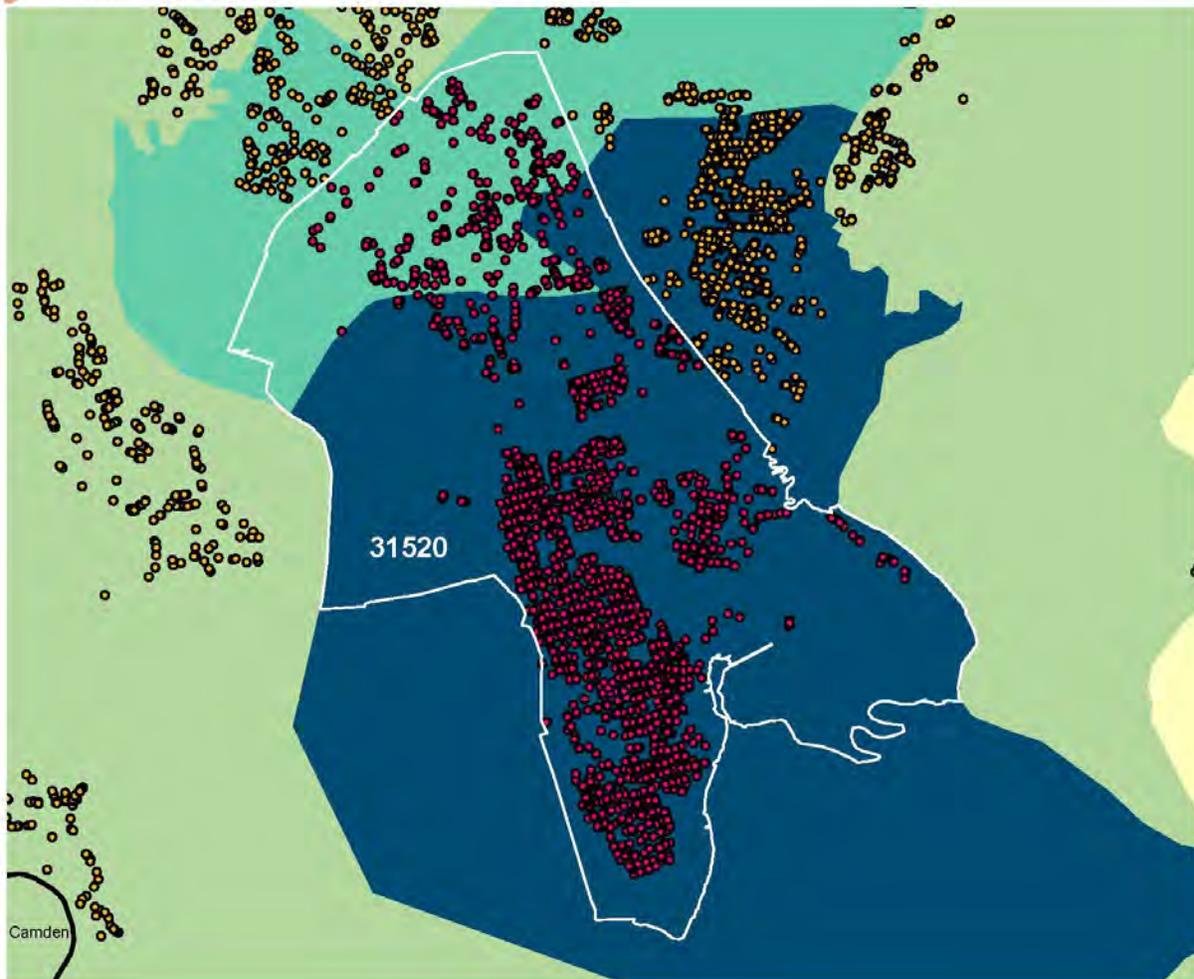
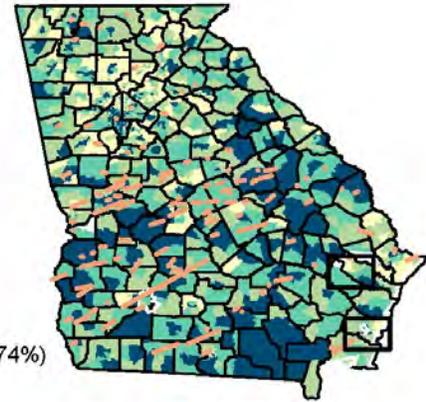


As of the flooding events resulting from Hurricane Irma, 2,147 properties were damaged in zip code 31548 in Camden County. Of these, 1,950 properties were damaged in the lower middle category on the social vulnerability index. 197 properties were damaged in the lowest category of the social vulnerability index.

Number of Applicants for DR- 4338

Social Vulnerability Index

- Highest (Top 4th) : 4,300 damaged properties (89.14%)
- Higher Middle 4th : 524 damaged properties (10.86%)
- Lower Middle 4th : 0 damaged properties (0%)
- Lowest (Bottom 4th) : 0 damaged properties (0%)
- Within Most Impacted Zip Code: 4,824 damaged properties (9.26%)
- Not Within Most Impacted Zip Code: 47,350 damaged properties (90.74%)
- Zip Code 31520 (Glynn)
- Storm Paths in 2017



As a result of Hurricane Irma, 4,824 properties were damaged in zip code 31520 in Glynn County. Of these, 4,300 properties were damaged in the highest category on the social vulnerability index. 524 properties were damaged in the higher middle category of the social vulnerability index. To note, there were no properties damaged within the bottom two categories of the social vulnerability index.

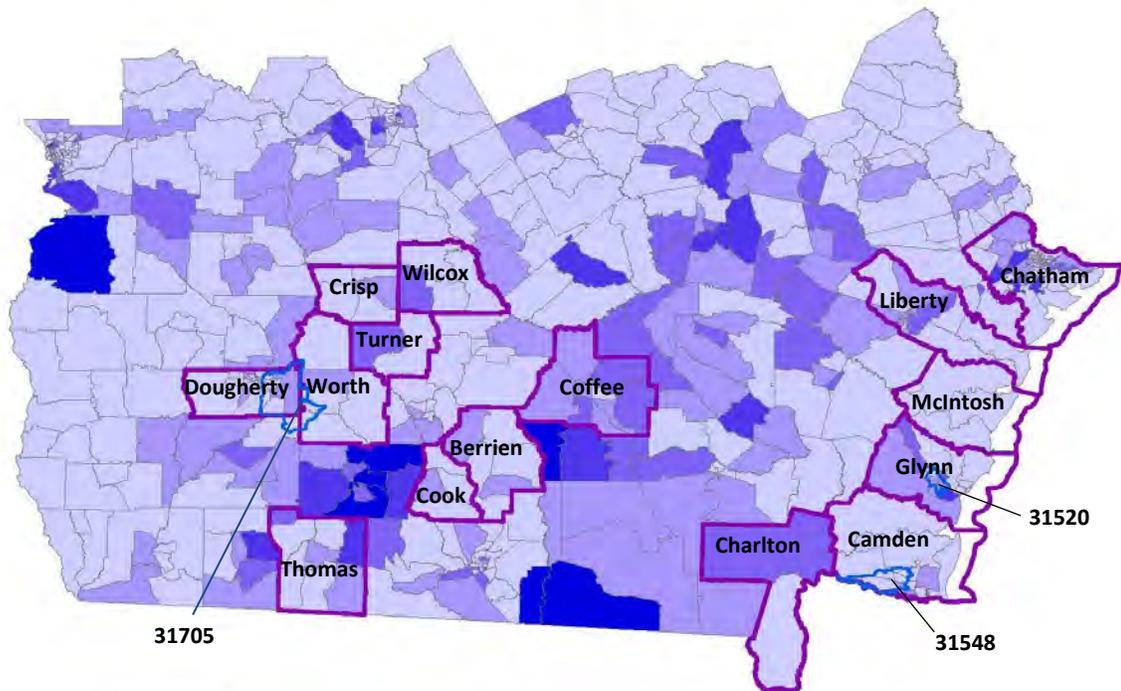
3D: Impact on Special Needs Populations

Individuals with access and functional needs limitations will require assistance with accessing and/or receiving disaster resources. These individuals could be children, older adults, pregnant women, from diverse cultures, transportation disadvantaged, homeless, or have chronic medical disorders. They could have disabilities, live in institutions, have limited English proficiency or altogether non-English speaking. Specialized resources may include, but are not limited to social services, accommodations, information, transportation, or medications to maintain health. Regardless of the nature of the need, care must be taken to ensure that all individuals are able to access disaster recovery resources.

According to U.S. Census data, approximately 3 to 10% of the population in the impacted counties speaks a language other than English at home and does not understand English well, with Charlton (9.6%), Glynn (8.6%), Coffee (10.4%), and Turner (6.3%) counties having the highest relative percent of the population wherein English is not the primary language. Careful consideration of the language needs of these populations will be taken during the applicant intake process. The table below indicates the number of residents who speak only English or who speak Spanish or other languages, by county. In total, over 33,000 residents in the impacted counties primarily speak Spanish in the home, while over 50,000 speak a language other than English.

County	Speaks Only English		Speaks Spanish		Speaks Language Other Than English	
	Number	Percent	Number	Percent	Number	Percent
Berrien	16,785	94.2%	815	4.6%	1,039	5.8%
Camden	44,890	93.3%	2,118	4.4%	3,198	6.7%
Charlton	11,102	90.4%	1,082	8.8%	1,183	9.6%
Chatham	238,513	90.4%	13,866	5.3%	25,266	9.6%
Coffee	35,948	89.6%	3,623	9.0%	4,177	10.4%
Cook	15,235	94.5%	642	4.0%	716	4.5%
Crisp	20,511	95.3%	562	2.6%	1,016	4.7%
Dougherty	82,766	96.6%	1,612	1.9%	2,948	3.4%
Glynn	70,868	91.4%	4,955	6.4%	6,703	8.6%
Liberty	29,712	96.8%	641	2.1%	993	3.2%
McIntosh	12,911	97.2%	194	1.5%	376	2.8%
Thomas	40,162	95.5%	1,431	3.4%	1,896	4.5%
Turner	7,170	93.7%	375	4.9%	482	6.3%
Wilcox	8,078	95.6%	333	3.9%	371	4.4%
Worth	31,510	94.8%	1,187	3.6%	1,738	5.2%

Percentage of persons (age 5+) who speak English "less than well"



Legend

 3 most impacted zip codes

 Impacted county

Limited English

 0% - 0.9%

 1% - 2.5%

 2.6% - 4.9%

 5% - 9.9%

 10% - 18.2%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.

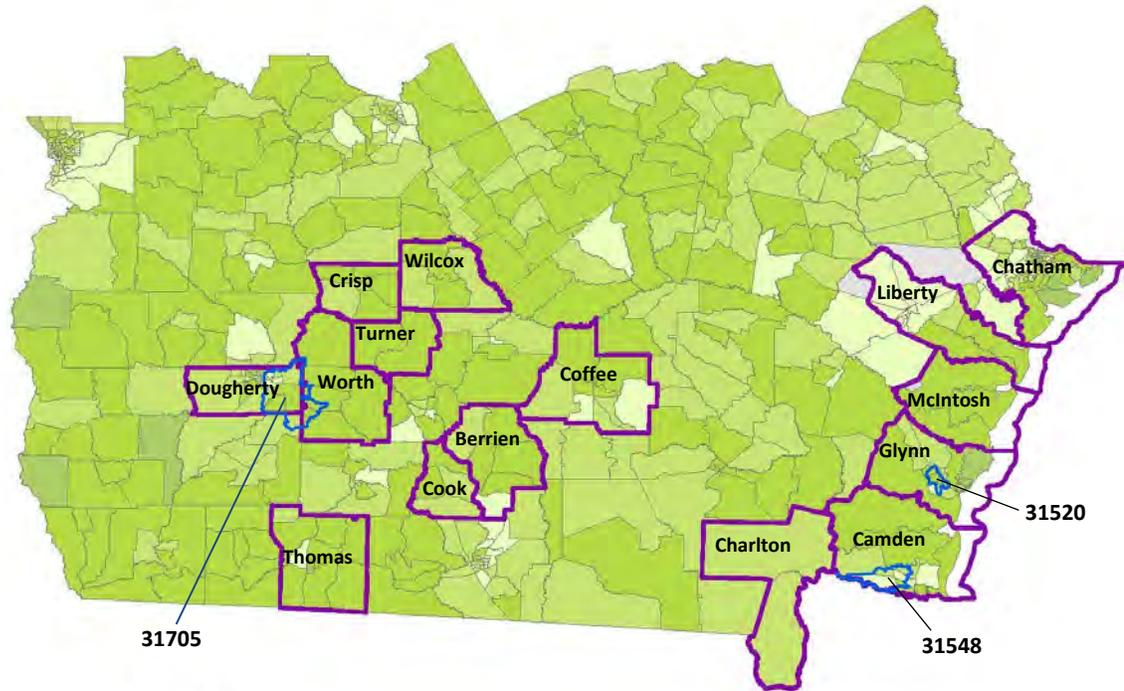


The figure above shows concentrations of limited English by census tract. As seen above, many of the impacted counties have areas where concentrations of persons with limited English speaking abilities exist. Thomas, Chatham and Glynn Counties have census tracts of persons who speak English "less than well" of the highest categories, 5% - 9.9% and 10% - 18.2%.

Table 10: COUNTY POPULATION WITH A DISABILITY			
COUNTY	TOTAL POPULATION	TOTAL POPULATION WITH A DISABILITY	PERCENTAGE OF POPULATION WITH A DISABILITY
BERRIEN	18696	3835	20.5%
CAMDEN	48375	5968	12.3%
CHARLTON	11838	1729	14.6%
CHATHAM	274555	34881	12.7%
COFFEE	39652	7026	17.7%
COOK	16969	2904	17.1%
CRISP	22633	4246	18.8%
DOUGHERTY	90428	13509	14.9%
GLYNN	81610	12595	15.4%
LIBERTY	57948	7359	12.7%
MCINTOSH	13827	3692	26.7%
THOMAS	44305	7656	17.3%
TURNER	7802	1597	20.5%
WILCOX	6818	1350	19.8%
WORTH	20826	3663	17.6%

According to the U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates, the greatest concentrations of persons with a disability are within McIntosh (26.7%) Berrien (20.5%), Turner (20.5%), and Wilcox Counties (19.8%). Persons suffering from disabilities have a hard time simply surviving, let alone recovering from disasters. Additionally, the rural nature of the affected counties makes it increasingly difficult for disabled persons to access food, healthcare, and emergency services. In the aftermath of disaster, these persons are often unable to seek additional assistance due to the barriers between them and accessing the services. For this reason, these persons are considered a vulnerable population with higher risks and greater needs.

Percentage of persons aged 65 and older



Legend

 3 most impacted zip codes

 Impacted county

Aged 65 and older

 No data

 Less than 9.9%

 10% - 14.9%

 15% - 24.9%

 25% - 49.8%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.



Being over the age of 65 contributes to the potential vulnerability of a household. Emergency relief and even more basic services are often not easily within reach for these populations. Some citizens over the age of 65 have decreased access to personal vehicles which can be a barrier to obtaining services for these groups. Also, according to ACS 2012-2016 data, within the 15 county affected area, the median household income for persons over the age of 65 is \$32,991. This limited income makes it difficult to recover from disasters. As seen in the figure above, persons age 65 or older make up more than 25% of the population within many of census tracts in the impacted counties.

3E: Transitional Housing/Homelessness

The triple threat of wind, rain, and flooding brought about by tornados and Hurricane Irma impacted community members across all walks of life. While some lost homes, others were without homes both prior and following the events of 2017. These events lead to shelters becoming overcrowded. According to a 2016 Point-In-Time report from the Georgia Homelessness and Special Needs Housing office, there were over 308 homeless people in the disaster affected counties, approximately 48% are considered to be unsheltered.⁴ The report referenced was funded by the Emergency Solutions Grant: a HUD program that aims to help homeless families and persons by improving the amount and quality of emergency shelters available, re-housing the homeless, and preventing more individuals and families from encountering homelessness. The state office of Homelessness and Special Needs Housing, provides opportunities for persons with illness, homelessness, and disabilities the opportunity for safe and sanitary housing.

People who are experiencing homelessness or who are precariously housed will be affected directly and indirectly by the disaster as both the formal support infrastructure (e.g. emergency shelters, supportive services only facilities) and informal support structures (e.g. families sharing spaces, informal leases) may be compromised. A comprehensive long-term recovery will take into account the housing and economic needs of the entire community; restore sufficient housing, jobs, and services to meet the broad spectrum of local needs; and help ensure that people who were experiencing homelessness or were precariously housed prior to the disaster become stably housed. With energy and resources focused on rebuilding, there is room to consider improvements and new approaches to community challenges such as preventing and ending homelessness. The community may have access to special funding allocations, such as CDBG-DR funds, that require an expansive analysis of community needs and a broad-based response that includes economic development, infrastructure, and housing. Instead of restoring pre-disaster conditions (and shortcomings), the community should assess its full needs and establish a recovery strategy to meet those needs.

Emergency Shelters

In the aftermath of the two tornados and Hurricane Irma, local governments along with non-governmental organizations and voluntary organizations including churches, charitable groups, and schools stepped up quickly to help their fellow neighbors. Shelters opened up across the state to provide those in need with a place to stay and to receive necessities and nourishment. Over 126 shelters were opened as a result of the three disasters occurring in 2017. The Georgia Emergency Management and Homeland Security Agency assisted with the coordination of these efforts to establish safe refuge for the storm victims. Table 11 indicates the number of shelters and capacity by county.

County	Shelters	Capacity
Berrien	8	1,359
Camden	11	2,714
Charlton	4	1,200
Chatham	27	13,899
Coffee	12	5,380
Cook	9	2,635
Crisp	7	2,648
Dougherty	13	3,489
Glynn	4	946
Liberty	9	2,660
McIntosh	3	1,231
Thomas	9	1,983
Turner	5	420
Wilcox	0	0
Worth	5	310

⁴ Georgia Point in Time Homelessness Survey

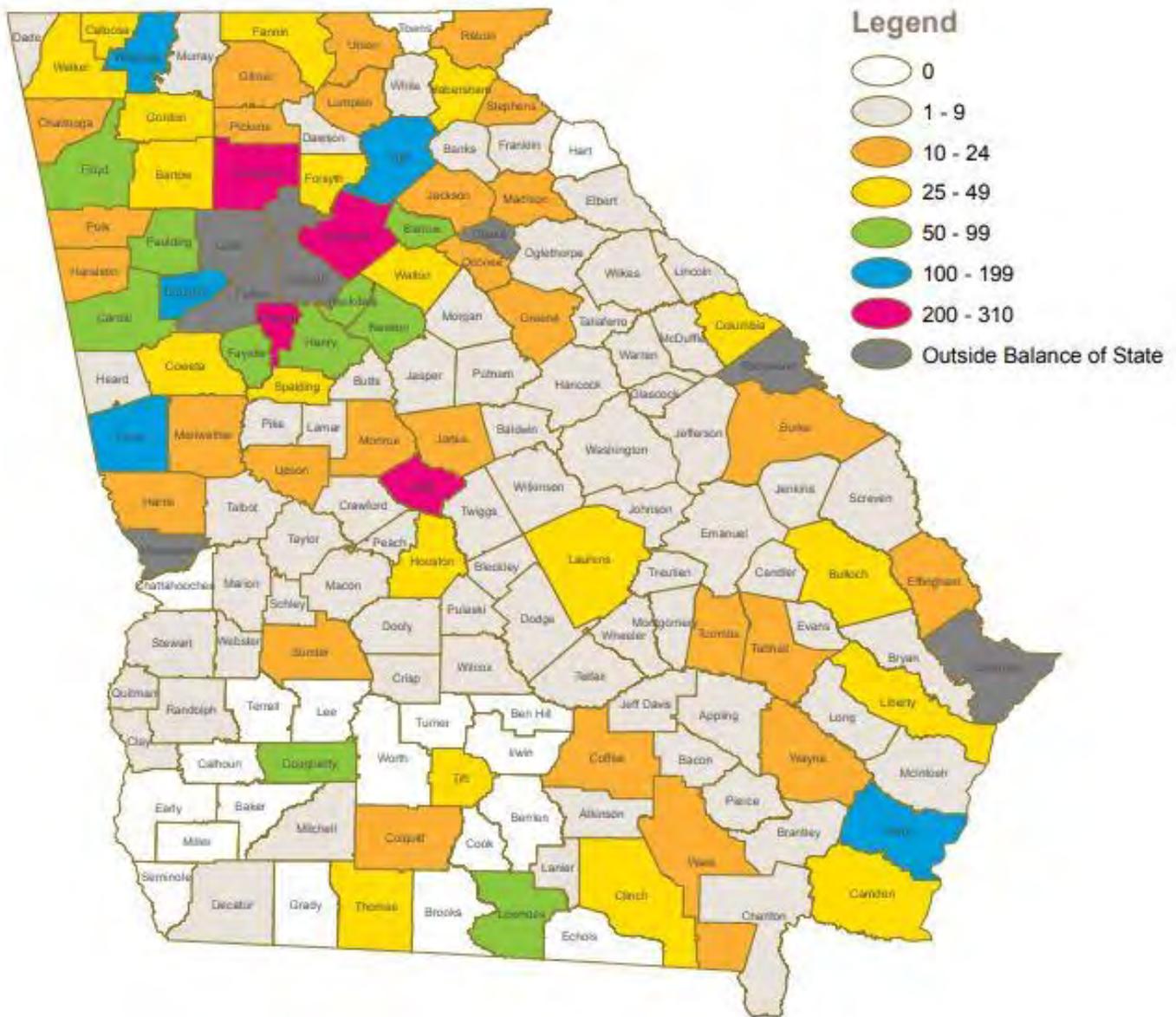
Table 12 : Homeless Population and Bed Counts							
County	Unsheltered Homeless Persons	Sheltered Homeless Persons	Total Homeless Persons	Total Emergency Shelter & Transitional Housing Beds	Imminent Homeless	Unsheltered Veterans	Unsheltered Chronic Extrapolation
Berrien	0	0	0	0	14	0	0
Camden	20	9	29	23	55	4	3
Charlton	2	0	0	0	0	1	1
Chatham	217	247	464	543	unknown	11	32
Coffee	16	0	16	0	1	2	0
Cook	0	0	0	0	12	0	0
Crisp	8	0	8	0	15	0	1
Dougherty	20	40	60	96	4	7	1
Glynn	68	44	112	62	41	11	15
Liberty	8	34	42	34	4	0	1
McIntosh	5	0	5	0	1	0	0
Thomas	10	20	30	23	7	0	4
Turner	0	0	0	0	6	0	0
Wilcox	4	0	4	0	16	0	0
Worth	0	0	0	0	2	0	0

Table 12 above indicates the number of unsheltered, sheltered, and total homeless persons within the impacted counties. The counties experiencing population of unsheltered homeless persons are: Camden, Coffee, Dougherty, Glynn, Liberty, McIntosh, Thomas, and Wilcox, while the greatest concentration of homeless persons exists within Chatham, Glynn, and Dougherty counties. Camden, Chatham, Dougherty, Glynn, Liberty, and Thomas have emergency shelter and transitional housing beds.

A map illustrating the total number of homeless persons on a state-wide level is provided on the following page.

2017 Georgia Balance of State Report on Homelessness

Total Homeless Persons



3F: Summary of Housing Impact

Single family homeowners in stick-built homes, single family homeowners in mobile homes, and renters in various housing types of housing stock were affected. The tables below shows the FEMA Verified Loss (FVL) determinations in the 4294, 4297, and 4338 disaster-impacted counties. Table 13 shows the greatest amount of FEMA Verified Losses were in Glynn, Dougherty, Chatham, and Camden County. The total FEMA Verified Losses for the 2017 disasters is \$12,473,441. Table 13 also indicated there were 49,947 applicants and 19,480 units were inspected.

Table 13: 2017 FEMA Disaster Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars (By County)
Glynn	11,132	4,123	37%	956	23%	\$3,118,836	\$3,262
Dougherty	5,146	2,651	52%	887	33%	\$2,241,620	\$4,624
Chatham	22,858	7,900	35%	662	8%	\$2,051,833	\$3,099
Camden	4,861	2,020	42%	653	32%	\$1,589,581	\$2,434
Turner	227	161	71%	119	74%	\$1,045,149	\$8,783
McIntosh	1,556	629	40%	274	44%	\$520,909	\$1,901
Liberty	2,103	785	37%	146	19%	\$482,942	\$3,308
Worth	173	95	55%	65	68%	\$415,042	\$6,385
Charlton	735	387	53%	188	49%	\$309,636	\$1,647
Coffee	695	417	60%	218	52%	\$279,120	\$1,280
Wilcox	62	32	52%	28	88%	\$184,494	\$6,589
Crisp	160	114	71%	78	68%	\$77,423	\$993
Berrien	46	34	74%	29	85%	\$68,220	\$2,352
Cook	107	78	73%	23	29%	\$59,999	\$2,609
Thomas	86	54	63%	41	76%	\$28,637	\$698
Total	49,947	19,480		4,367		\$12,473,441	
Average			54%		50%		\$3,330.90

Table 14: 2017 FEMA Disaster 4338 Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Glynn	11,132	4,123	37%	956	23%	\$3,118,836	\$3,262
Chatham	22,858	7,900	35%	662	8%	\$2,051,833	\$3,099
Camden	4,861	2,020	42%	653	32%	\$1,589,581	\$2,434
McIntosh	1,556	629	40%	274	44%	\$520,909	\$1,901
Liberty	2,103	785	37%	146	19%	\$482,942	\$3,308
Charlton	735	387	53%	188	49%	\$309,636	\$1,647
Coffee	695	417	60%	218	52%	\$279,120	\$1,280
Berrien	0	0	0	0	0	0	0
Cook	0	0	0	0	0	0	0
Crisp	0	0	0	0	0	0	0
Dougherty	0	0	0	0	0	0	0
Thomas	0	0	0	0	0	0	0
Turner	0	0	0	0	0	0	0
Wilcox	0	0	0	0	0	0	0
Worth	0	0	0	0	0	0	0
Total	43,940	16,261	20%	3,097	15%	\$8,352,857	\$2,697

As seen in the table 14 (above), DR-4338, or Hurricane Irma, resulted in a total of \$8,352,857 in FEMA Verified Losses.

Table 15: 2017 FEMA Disaster 4294 Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Dougherty	2,837	1,428	50%	372	26%	\$363,638	\$978
Berrien	0	0	0	0	0	0	0
Camden	0	0	0	0	0	0	0
Charlton	0	0	0	0	0	0	0
Chatham	0	0	0	0	0	0	0
Coffee	0	0	0	0	0	0	0
Cook	0	0	0	0	0	0	0
Crisp	0	0	0	0	0	0	0
Glynn	0	0	0	0	0	0	0
Liberty	0	0	0	0	0	0	0
McIntosh	0	0	0	0	0	0	0
Thomas	0	0	0	0	0	0	0
Turner	0	0	0	0	0	0	0
Wilcox	0	0	0	0	0	0	0
Worth	0	0	0	0	0	0	0
Dougherty	2,837	1,428	50%	372	26%	\$363,638	\$978

As seen in the table 15 (above), DR-4294, or the tornado occurring on January 2, 2017, resulted in a total of \$363,638 in FEMA Verified Losses.

Table 16: 2017 FEMA Disaster 4297 Totals							
County	# Applicants	# Inspected	% Inspected	Applicants With FVL	% Inspected with FVL	FVL Dollars	Average FVL Dollars
Dougherty	2,309	1,223	52%	515	42%	\$1,877,981	\$3,647
Turner	227	161	70%	119	73%	\$1,045,149	\$8,783
Worth	173	95	54%	65	68%	\$415,042	\$6,385
Wilcox	62	32	51%	28	87%	\$184,494	\$6,589
Crisp	160	114	71%	78	68%	\$77,423	\$993
Berrien	46	34	73%	29	85%	\$68,220	\$2,352
Cook	107	78	72%	23	29%	\$59,999	\$2,609
Thomas	86	54	62%	41	75%	\$28,637	\$698
Camden	0	0	0	0	0	0	0
Charlton	0	0	0	0	0	0	0
Chatham	0	0	0	0	0	0	0
Coffee	0	0	0	0	0	0	0
Glynn	0	0	0	0	0	0	0
Liberty	0	0	0	0	0	0	0
McIntosh	0	0	0	0	0	0	0
Total	3,170	1,791	35%	898	35%	\$3,756,946	\$4,184

As seen in the Table 16 (above), DR-4297, or the tornadoes occurring on January 21-22, 2017, 3,170 individuals applied for FEMA assistance. Of those, 1,791 (35%) units were inspected and 898 applicants had a FEMA verified loss. Disaster DR-4297 resulted in a total of \$3,756,946 in FEMA Verified Losses.

3G: Housing Types Affected

Nearly 50,000 applicants filed for FEMA (IA) Individual Assistance in the eligible counties as a result of the 2017 disasters. Of those who specified housing unit type, only 40% are homeowners, including single-family homes, duplex units, mobile homes and other housing types. The remaining 60% are renters, including renters of single-family homes, mobile homes, apartment units and other housing types. Table 17 (below) displays the different housing types and whether the occupant is a renter or owner.

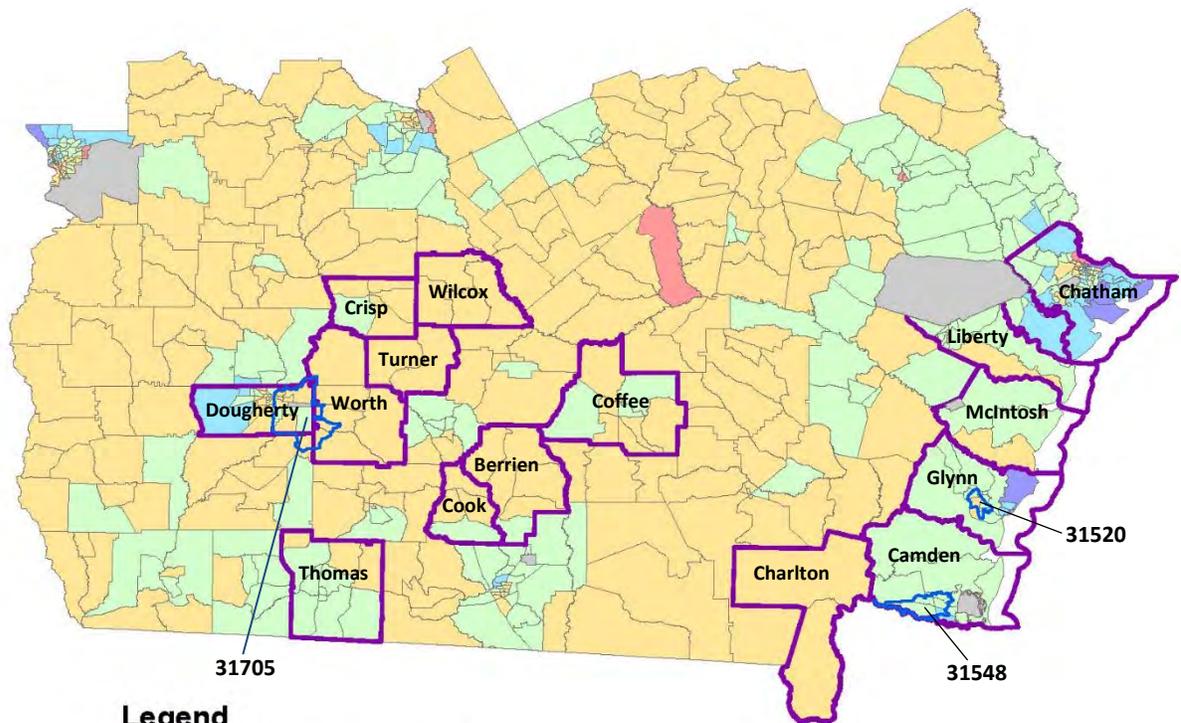
Table 17: 2017 Disasters by Residence Type			
Housing Unit Type	Owner	Renter	Not Specified
Apartment	9	10269	8
Assisted Living Facility	0	54	0
Boat	13	4	0
College Dorm	0	19	0
Condo	150	239	0
Correctional Facility	0	7	0
House/Duplex	16381	14888	92
Military Housing	0	94	0
Mobile Home	2791	2431	21
Other	622	1082	10
Townhouse	173	464	0
Travel Trailer	77	48	2
Total:	20,216 (40%)	29,599 (60%)	133 (<1%)

3G.1: Single Family

Median housing values range from less than \$39,999 to greater than \$350,000 throughout Southern Georgia. The map below shows higher value homes concentrated along the coast. While the coastal areas experienced greater swaths of damage throughout the community creating higher damage cost estimates, the individual devastation in the southwestern portions of the state was immensely high. Both sets of communities have high levels of unmet need for repair and recovery, with each community facing its own set of unique challenges.

Median Value (Dollars)

Owner-occupied housing units



Legend

- 3 most impacted zip codes
- Impacted county
- Military installation

Median Value

- Less than \$39,999.99
- \$40,000.00 - \$99,999.99
- \$100,000.00 - \$174,999.99
- \$175,000.00 - \$349,999.99
- \$350,000.00 and above

Data Source: MEDIAN VALUE (DOLLARS)
 Universe: Owner-occupied housing units more information
 2012-2016 American Community Survey 5-Year Estimates, Table B25077

There are over 1.5 million housing units in the entire impacted area, many of which were built between 1980-1999. The table below shows the percentage of units by the year they were built. With much of the housing stock in the 30-year range, key systems such as electrical, roofing, water heaters and furnaces may have already cycled through a replacement life-span in many homes. This means that many homes will be replacing essential systems for a second time, further compounding the financial hardship and frustration that accompanies disaster recovery. However, this provides an opportunity for greater efficiency to reduce and mitigate future utility costs and provide better resiliency.

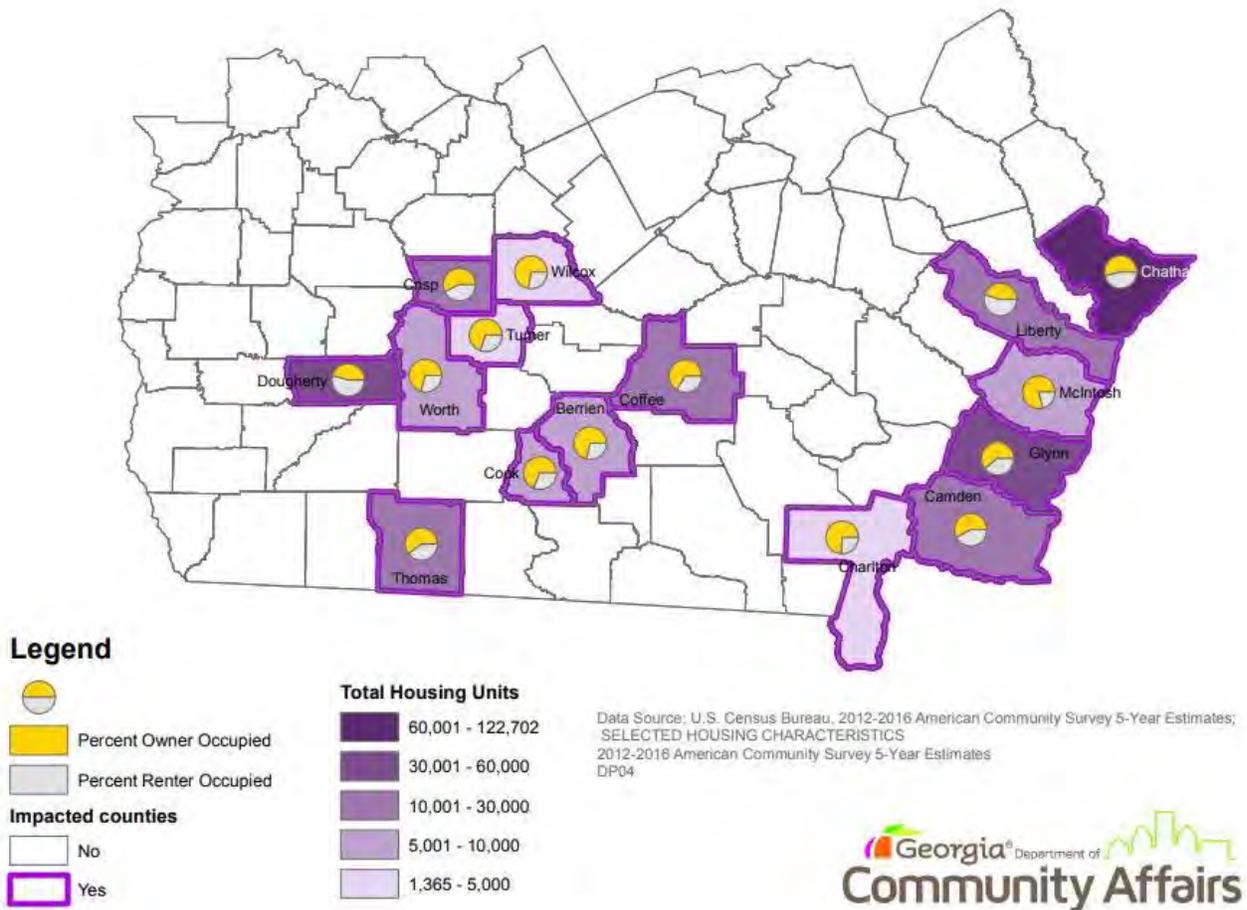
Table 18: Age of Housing Stock: Percentage of Units by Year Built, by County (ACS 2011-2015)

County	Total Housing Units	Percentage of Units by Year Built									
		2014 or later	2010-2013	2000-2009	1990-1999	1980-1989	1970-1979	1960-1969	1950-1959	1940-1949	Pre 1939
Berrien	8641	0.00%	1.59%	16.57%	21.84%	14.10%	17.91%	9.08%	9.04%	4.62%	5.25%
Camden	21415	0.20%	3.27%	23.17%	26.75%	21.22%	9.95%	4.50%	4.54%	3.39%	3.00%
Charlton	4425	0.25%	2.44%	15.12%	23.12%	17.45%	13.83%	8.86%	9.13%	4.41%	5.40%
Chatham	122702	0.42%	3.44%	20.28%	13.22%	14.10%	12.99%	9.51%	10.33%	5.58%	10.13%
Coffee	16909	0.18%	1.81%	15.87%	26.23%	17.93%	15.47%	8.81%	5.59%	4.02%	4.10%
Cook	7239	0.17%	2.11%	13.08%	25.31%	13.32%	18.03%	10.21%	8.34%	1.81%	7.63%
Crisp	10715	0.00%	0.48%	11.10%	14.86%	18.31%	19.64%	12.55%	10.31%	7.27%	5.49%
Dougherty	40713	0.04%	1.53%	11.93%	12.56%	13.88%	21.27%	17.03%	12.75%	5.70%	3.30%
Glynn	41748	0.71%	1.35%	22.21%	16.48%	17.26%	15.72%	9.66%	8.12%	3.87%	4.62%
Liberty	27233	0.10%	3.36%	21.37%	28.99%	20.40%	12.94%	5.85%	0.41%	1.70%	1.20%
McIntosh	9289	0.81%	1.44%	27.29%	27.88%	15.19%	7.83%	6.84%	5.02%	2.23%	5.48%
Thomas	20323	0.45%	1.37%	17.53%	18.30%	17.05%	13.13%	9.41%	8.29%	4.57%	9.89%
Turner	3838	0.21%	0.99%	15.42%	15.16%	8.88%	16.44%	15.06%	13.78%	2.74%	11.31%
Wilcox	3483	0.14%	2.24%	9.27%	16.16%	17.97%	17.86%	12.29%	7.49%	6.32%	10.25%
Worth	9205	0.55%	1.60%	11.95%	21.03%	22.06%	16.28%	10.14%	4.79%	2.66%	8.93%
Total	347878	0.28%	1.93%	16.81%	20.53%	16.61%	15.29%	9.99%	7.86%	4.06%	6.40%

3G.2: Rental Housing

According to the US Census 2012-2016 5-Year Estimates, the rental vacancy rate for Georgia is 37.2% and the median rent for the State of Georgia is \$897 monthly. As indicated by the map below, the urban communities have the greatest number of housing units with many being renter occupied. The less urban counties have higher percentages of owner occupied units. Within the impacted area, Dougherty County and Liberty County have a greater number of renter occupied units than owner occupied units.

Housing Units



The 2017 disasters caused significant damage to the rental stock which led to displacement for the rental population (See Table 16 on Page 38 for impacts to rental population). The loss of affordable housing stock has the broadest and more long-term impact on surrounding communities. According to ACS 2013-2017 5-Year Estimates, many of the counties in the 15-county affected area have low amounts of vacant housing units. This data can be seen in Table 19, on the following page. When looking specifically at Camden, Dougherty, and Glynn Counties, three counties located within the Most Impacted and Distressed Zip Codes, the percentage of vacant housing units are 13%, 14%, and 21%, respectively. These figures include rental and homeowner housing units. Given the low rates of vacant housing, the probability of finding available housing after a disaster that meets the needs of the families is low. Therefore, these people are likely moving to other communities to find suitable housing. Use of CDBG-DR funds is necessary

to prevent outward migration and to serve those in substandard properties because that was all that was available. An Affordable Multi-Family Rental Program and Homeowner Repair and Reconstruction Program is proposed to assist this population. This program is discussed in detail in Section 5: Method of Distribution on page 62.

County	Total housing units	Occupied housing units	%	Vacant housing units	%
Berrien	8,759	7,244	83%	1,515	17%
Camden	21,687	18,911	87%	2,776	13%
Charlton	4,494	3,537	79%	957	21%
Chatham	123,555	107,369	87%	16,186	13%
Coffee	17,184	14,331	83%	2,853	17%
Cook	7,354	6,067	82%	1,287	18%
Crisp	10,781	8,312	77%	2,469	23%
Dougherty	40,702	34,841	86%	5,861	14%
Glynn	42,299	33,205	79%	9,094	21%
Liberty	27,696	23,098	83%	4,598	17%
McIntosh	9,492	5,733	60%	3,759	40%
Thomas	20,546	17,259	84%	3,287	16%
Turner	3,901	3,101	79%	800	21%
Wilcox	3,520	2,675	76%	845	24%
Worth	9,316	7,900	85%	1,416	15%

3G.3: Mobile Homes

Damage caused to mobile homes by wind, rain, and flooding is often difficult to repair, due to the integrated nature of the building components. In addition, when considering whether or not a structure is repairable, the cost of making those repairs may be disproportionately high when considering the overall value of the structure. Often, the full extent of mobile home damage is not always realized in the early months after an event and can go unreported in the initial damage inspection. Damage such as water saturation of the particle board material that makes up the floor framing and decking can cause unsafe deterioration over time. The potential for mold and mildew in the home’s structure or insulation can develop over time as well. Of the 49,950 FEMA IA applicants in the state-assessed areas, approximately 5,243 of them reside in mobile home units.

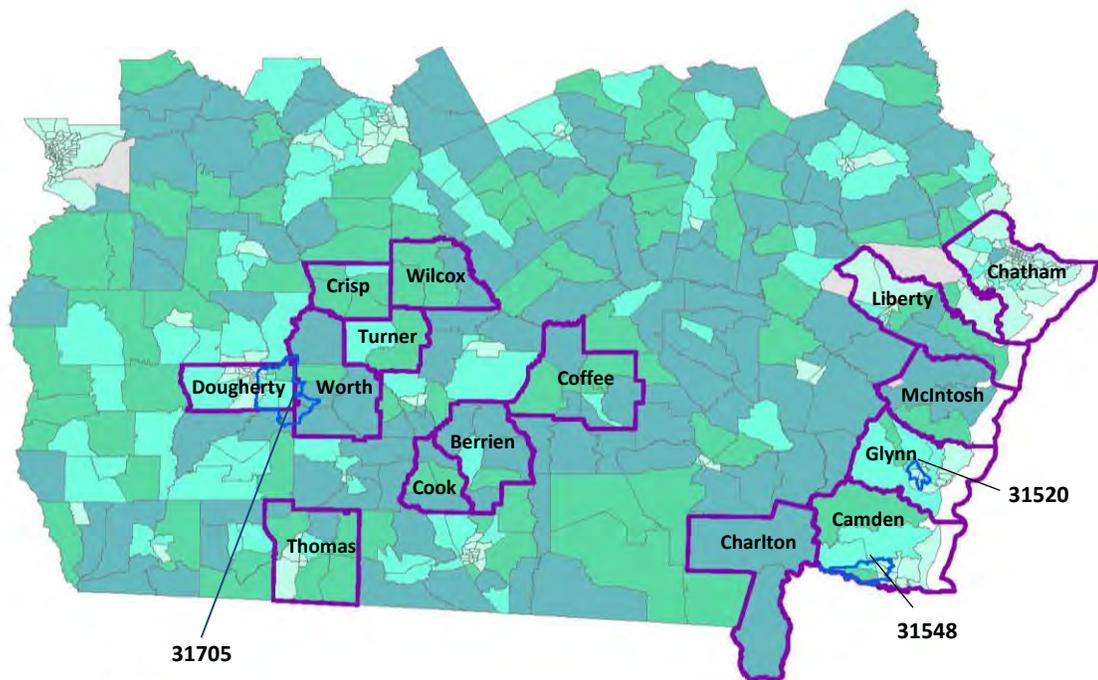
As seen in Table 20, within the 15-county affected area there were 1442 mobile homes with FEMA Real Property Verified Losses due to the 2017 disasters. The damage to mobile homes was concentrated in Camden, Coffee, Dougherty, Glynn, and McIntosh Counties. Within these four counties, 824 mobile homes had a FEMA verified loss. Also, as seen on the Map on the following page, there are heavy concentrations of mobile homes throughout the 15-county area. Because of this information, two of the CDBG-DR programs are intended to assist these persons. The Affordable Multi Family Rental Program will create housing for renters and

County	Mobile Homes with FEMA Verified Loss
Dougherty	241
Glynn	233
Camden	177
McIntosh	173
Coffee	133
Charlton	116
Liberty	63
Turner	62
Chatham	53
Crisp	52
Worth	52
Wilcox	25
Thomas	23
Berrien	20
Cook	19
Total:	1442

the Homeowner Rehabilitation and Reconstruction Program will assist homeowners. These programs and the provisions for those who reside in mobile homes are discussed in greater detail in Section 6: Method of Distribution.

The map below shows the percentage of mobile homes by block group throughout the State of Georgia. Many of the impacted counties have areas that fall within the highest category (35% - 63.6%). To note, all census tracts within Charlton County fall within the highest category.

Percentage of Mobile Homes



Legend

3 most impacted zip codes

Impacted county

Mobile homes

No data

Less than 9.9%

10% - 24.9%

25% - 34.9%

35% - 63.6%

Data source: Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry (ATSDR)/ Geospatial Research, Analysis, and Services Program. Social Vulnerability Index 2016 Database Georgia. <http://svi.cdc.gov/SVIDataToolsDownload.html>. Accessed on 2016

ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created the Social Vulnerability Index (SVI) to help public health officials and emergency response planners identify and map the communities that will most likely need support before, during, and after a hazardous event.

The SVI provides specific socially and spatially relevant information to help public health officials and local planners better prepare communities to respond to emergency events such as severe weather, floods, disease outbreaks, or chemical exposure.

3G.4: Public Housing

Public Housing is an integral piece of the State of Georgia’s housing resources for low-income persons. After speaking with the affected counties, it was determined that none of the public housing facilities were heavily impacted and all public housing residents remained in a home.

3H: Fair Housing

The State of Georgia’s resilience planning will incorporate measures to strategically align resources in a way that promotes protecting people from discrimination when they are renting, buying, or securing financing for housing, consistent with HUD’s direction to Affirmatively Further Fair Housing. The State of Georgia conducted an Analysis of Impediments to Fair Housing Choice (AI) in 2016 in order to research, analyze, and identify prospective impediments to fair housing choice throughout non-entitlement areas of the state. Identified impediments and recommended actions can be seen in the Table 21 and Table 22.

Table 21 - Private Sector Impediments and Suggested Actions	
Impediment	Action
Discrimination based on race and disability in the rental markets.	1.1: Conduct outreach and education concerning fair housing law and policy for landlords and property managers who are participating in DCA’s Housing Programs throughout the state.
Failure to make reasonable accommodation or modification in the rental markets.	2.1: Conduct outreach and education within DCA’s housing programs concerning fair housing, Section 504 and ADA law for landlords and property managers throughout the state, focusing on the law’s requirements as well as common misconceptions about those requirements
Black and Hispanic home loan applicants are denied more frequently than white and non-Hispanic applicants.	3.1: Conduct financial management outreach and education, through collaboration with housing counseling agencies, home buyer education entities and other partner organizations like the Georgia Student Finance Commission (GSFC) relating to credit and ways to build and maintain good credit. 3.2 Create and implement a training for new lenders with the Georgia Dream program and existing lenders on DCA’s lender advisory board related to the Supreme Court decision on disparate impact as it relates to race and ethnicity and the possible effect on lending laws and regulations. Also disseminate information via DCA’s lender advisory newsletter.
Female applicants have a higher denial rate than male applicants in rural Georgia home purchase markets.	4.1: Conduct financial management outreach and education, through collaboration with housing counseling and home buyer education agencies as well as other partners like GSFC, relating to credit and ways to build and maintain good credit. 4.2.: Provide training to new and existing lending partners with DCA on disparate impact related to differing lending rates by gender and share the results of the AI. Disseminate information at DCA’s lender advisory board meeting and via the lender advisory newsletter.

Limited access to fair housing enforcement entities throughout rural areas of the state	5.1: Compile a statewide database of local private organizations that provide fair housing complaint referral or other fair housing services. Include information on these entities and fair housing laws and updates in DCA’s current communications through newsletters to promote the dissemination of information concerning developments in fair housing policy and trends in fair housing enforcement and complaints.
Need for additional fair housing outreach and education.	6.1: Conduct outreach and education pertaining to fair housing, in partnership with local public housing agencies and non-profit and civic organizations, targeting housing providers and consumers. 6.2: Design and implement an outreach campaign to publicize fair housing law and policy during fair housing month (April) of every year.

Table 22 - Public Sector Impediments and Suggested Actions

Impediment	Action
Limited presence of fair housing enforcement entities in rural Georgia.	1.1: Compile a statewide database of local private organizations that provide fair housing complaint referral or other fair housing services. Include information on these entities and fair housing laws and updates in DCA’s current communications through newsletters to promote the dissemination of information concerning developments in fair housing policy and trends in fair housing enforcement and complaints.
Need for additional outreach and education.	2.1: Conduct outreach and education pertaining to fair housing, targeting local government agencies, sub recipients or grantees of DCA funding and PHAs, with the goal of keeping public officials throughout the state apprised of ongoing changes to fair housing law and policy. 2.2: Design and implement an outreach campaign to publicize fair housing law and policy during fair housing month (April) of every year.
NIMBYism and public policies used to limit access to affordable housing. T	3.1: Share existing data and information on the impact of NIMBYism with sub recipients, local grantees and public housing agencies (PHAs) outlining the implications of the recent Supreme Court decision in Texas Department of Housing and Community Development v. Inclusive Communities Project for the development and placement of affordable housing units.
Individuals with Housing Choice Vouchers (HCVs) predominately reside in high minority concentrated areas.	4.1: Conduct outreach to landlords and property owners on making units throughout the state available to persons with HCV while developing and implementing policies in the Low Income Housing Tax Credit (LIHTC) program that encourage the development of affordable housing units in communities of opportunity.
Limited knowledge of fair housing law in rural areas of the state.	5.1: Conduct ongoing fair housing outreach and education sessions, in partnership with the entities identified in fulfillment of Public Sector Action 2.1, targeting housing providers and consumers.

3I: Housing Funds Made Available

The main federal funding sources that are available for impacted residents in the immediate aftermath of a disaster are FEMA Individual Assistance, low-interest loans from the U.S. Small Business Association (SBA), and insurance proceeds from the National Flood Insurance Program (NFIP). These three funding streams account for the majority of the housing recovery funds made available before CDBG-DR.

3J: Federal Emergency Management Agency (FEMA) Assistance

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster declared counties. Individual Assistance data is broken down into three categories, Housing Assistance, Other Needs Assistance, and the Individual and Household Program. Housing funds, made available through the Housing Assistance (HA) program, help to bridge the gap from sheltering to permanent housing. These funds can be used for limited basic home repairs and replacement of essential household items, as well as rental payments for temporary housing. FEMA IA is limited to bring a home back to a basic level of “safe and sanitary living or functioning condition,” and may not account for the full extent of the home’s damage or need. As seen in Table 23, 49,947 people applied for FEMA assistance. Of those, 20,216 (40%) were homeowners and 29,599 (60%) were renters. FEMA was able to assist 6,319 people and of those 2,714 (43%) were homeowners and 3,604 (57%) were renters. This leaves a total of 43,628 who were unable to obtain FEMA assistance. Many of these people have unmet needs. The unmet needs related to this data will be discussed at length in Section 4.

Table 23 - FEMA Assistance				
Category	Homeowner	Rental	Owner/Renter Status Not Disclosed	Total
Registrants	20,216	29,599	132	49,947
# FEMA Assisted	2,714	3,604	1	6,319
\$ FEMA Assistance	\$8,582,647	\$3,916,876	\$1,848	\$12,501,371
Average Assist \$	\$3,162	\$1,087		1,978

3K. Small Business Administration (SBA) Home Loans

The SBA has made \$ 23,742,300 in assistance available to 743 applicants in the areas of impact. The low-interest loans are made available for the purposes of home repair and personal property loss. The average loan for this disaster event was \$31,954. SBA makes Loans to homeowners or renters to repair or replace disaster-damaged real estate and personal property, including automobiles. The total amount of the loan depends on the cost to repair the residence, less any insurance settlements or grants.

As can be seen in Table 24, 15,401 people were referred to SBA by FEMA. Only 14% of those people actually applied for SBA assistance. Of those, only 743 SBA applicants received a loan, equaling 34%. This leaves a great deal of unmet need. For some reason, 13,226 people did not apply to SBA after their referral. The reasoning could be the applicant knew they could not afford to pay back a loan and chose not to even apply, or they knew they would not be approved due to low credit scores.

Table 24 - SBA Home Loan Applications (As of 7/11/18)				
County	FEMA Referrals	Applications Received	Applications Approved	Amount Approved
Berrien	22	7	4	\$ 297,700
Camden	2081	342	146	\$ 4,037,300
Charlton	259	40	10	\$ 215,500
Chatham	5241	348	67	\$ 2,642,000
Coffee	279	54	13	\$ 258,100
Cook	40	12	2	\$ 42,100
Crisp	56	15	5	\$ 88,300
Dougherty	2,347	615	230	\$ 7,085,100
Glynn	3,644	529	194	\$ 6,449,300
Liberty	653	65	20	\$ 610,400
McIntosh	473	57	23	\$ 329,700
Thomas	47	18	5	\$ 236,900
Turner	116	32	13	\$ 990,300
Wilcox	40	9	1	\$ 46,700
Worth	103	32	10	\$ 412,900
TOTAL	15,401	2,175	743	\$ 23,742,300

3L: National Flood Insurance Program (NFIP) Coverage

The National Flood Insurance Program (NFIP) provides insurance coverage to any property owner willing to pay the associated premiums. At this time NFIP data has not been shared with DCA. This section along with all relevant sections will be updated as the information becomes available. Overall flood related damage is less than the damage sustained from the tornadoes. Only a subset of the counties have flood needs.

4. Unmet Needs

The Unmet Needs Assessment seeks to evaluate the three core aspects of recovery – housing, infrastructure (which includes public facilities and services), and economic development. In this section remaining unmet need will be calculated by first estimating the portion of need likely to be addressed by insurance proceeds, other federal assistance, or any other funding source by using the most recent available data.

The preliminary total estimated impact from the January 2017 tornadoes and Hurricane Irma in Georgia is \$465,300,736 across the housing, economy, and infrastructure sectors combined. These estimates are based on best available data at this time and may be adjusted in the future as additional data becomes available. After accounting for funds already made available through state and other federal assistance and other funds, the remaining estimated unmet need is approximately \$356,277,486.

The federal allocation of ~~\$37,943,000~~ \$50,958,596 million will allow the State of Georgia to address ~~11%~~ 14% of the total estimated unmet need remaining.

When examining the relative need by sector, housing represents the greatest unmet need of \$328,955,736 (92%) of need, followed by the infrastructure sector with \$12,621,750 (4%) of need, followed by the economic sector with \$14,700,000 (4%) of need. Each of these three sectors will be addressed in detail in the sections to follow.

Table 25: Unmet Needs Summary Table				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	8 \$358,455,736	\$84,145,000	\$22,700,000	1 \$465,300,736
Amount of Funds Available	\$29,500,000	\$71,523,250	\$8,000,000	\$109,023,250
Remaining Unmet Needs	5 \$328,955,736	\$12,621,750	\$14,700,000	7 \$356,277,486
Percentage of Remaining Unmet Needs	92%	4%	4%	100%

4A: Housing Unmet Needs

Traditional Unmet Needs Calculation

The core data on housing damage for the unmet housing needs calculation is based on home inspection data for FEMA's Individual Assistance program. HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the estimated cost to repair those units less repair funds already provided by FEMA and SBA. Each of the FEMA inspected units are categorized by HUD into one of five categories:

Table 26: HUD Damage Categories	
Category	FEMA inspected real property damage
Minor-Low	< \$3,000
Minor-High	\$3,000 - \$7,999
Major-Low	\$8,000 - \$14,999 and/or 1 to 4 feet of flooding on the first floor;
Major-High	\$15,000 - \$28,800 and/or 4 to 6 feet of flooding on the first floor.
Severe	> \$28,800 or determined destroyed and/or 6 or more feet of flooding on the first floor.

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the multipliers provided by HUD for the State of Georgia (seen in the table

below). The multipliers use the median real property damage repair costs determined by the Small Business Administration for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster. By multiplying the number of units by the multipliers, the housing unmet needs was calculated.

Table 27: Total Damage Using HUD Unmet Needs Multipliers			
Category of Damage	Number of Units	Serious Unmet Needs Multipliers	Total Unmet Needs
Major-Low	308	40,323	\$ 12,419,484
Major-High	183	55,812	\$ 10,213,596
Severe	53	77,252	\$ 4,094,356
Total:	544		\$ 26,727,436

Because accurate/complete data sources are often difficult to obtain after a major disaster event, HUD has stated that empirically justified calculations may be used to determine the average cost to fully repair a home.

Empirically Justified Calculations

Impact assessment methodologies have often utilized the Small Business Administration estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance data in combination with each other to triangulate and identify more accurate levels of unmet need than if the FEMA estimated losses were the sole source of information. Utilizing SBA loan values as an indicator of the amount of support any individual household will require to fully repair their homes again provides a more comprehensive look at recovery than simply looking at a FEMA inspected damage. SBA sends construction specialists trained to evaluate a more detailed determination of current market cost to repair or replace a damaged structure. They also include up to 20% in costs for mitigation or resiliency needs to support a more comprehensive and often higher dollar estimate of recovery than that coming from FEMA. **Although the SBA estimates are the greater of the two data sets, the figure is still likely an underestimate.** HUD assisted homes can require and will fund greater levels of energy efficiency, resilience or mitigation, causing the costs to be greater. FEMA Individual Assistance data reflects the impact of a disaster on a population by illustrating the number of registrations and the number of households ultimately approved for housing assistance. This data shows us where the damage is found and indicates the broad concentrated areas of need and the estimated cost to repair each site. However, this data is lacking an accurate scale. SBA disaster home loan data reflects registrations and applications for loans which result in valuations of verified loss that are more true to scale than FEMA verified loss calculations. This data shows us the cost to repair.

Additional Housing Unmet Need (Population Under-Represented in FEMA/SBA data)

The traditional unmet needs calculation does not entirely represent the impacts sustained within the 15 affected counties as defined by the FR Notice. An analysis to further, better and more comprehensively determine other unmet need to be served by CDBG-DR funds is needed. Each of the sections below detail additional unmet needs to be included in the unmet needs calculations.

FEMA Applicants who did not receive funding/Inconsistencies with Disaster Data

Table 28: FEMA Assistance Applicants	
Total FEMA Applicants	49,947
Applicants approved for FEMA assistance	6,319
Applicants unable to obtain FEMA assistance	43,628

There are a variety of reasons why the 43,628 applicants did not receive funding. Some of these are: insufficient damage, duplicate applications, and damages not being disaster related. Presumably these applicants do not have unmet needs. However, applicants who were denied for the following reasons may have unmet needs: no contact for inspection, missed inspection, signature not obtained, or no substantiation submitted. Another reason for denial is the applicant has insurance coverage. Although the applicant has coverage, there may still be unmet need. Also, many applicants withdrew their applications voluntarily. For some, withdrawal may have been because of inability to complete the applications. Due to these reasons, a percentage of the applicants unable to obtain FEMA funding will be considered to have unmet needs.

Another reason for adjusting the FEMA data for unmet needs calculations is the inconsistency between the disaster data and the on-the-ground data. DCA worked with local communities to get a more detailed picture of the overall remaining unmet need. Meetings with local communities revealed a greater number of damaged properties than the disaster data shows. A particular inconsistency relates to Disasters 4294 and 4297, affecting Dougherty County. Table 29 below shows the inconsistencies.

Table 29: Dougherty County Disaster Data	
Total impacted residential structures confirmed by Dougherty County	1,727
FEMA Data: Residential Properties with FVL	889
Total properties undercounted in FEMA data	838

A potential reason for the differing data is the FEMA damage inspectors may attribute damage claimed by the applicant as flood/storm-related to have been caused by pre-disaster conditions, or deferred maintenance. This shows the disparity between the “on the ground damage” confirmed by the local government and the disaster data. This is one example of the inconsistencies between the disaster data and local data, there could be more.

Based on the denied FEMA applicant data and the inconsistencies with disaster data, DCA estimates 5% (2,181) of the applicants that did not receive FEMA funding have unmet needs.

2,181 x 19,700 (Median SBA loan amount) = 42,965,700

FEMA referrals that did not apply for SBA loan

FEMA determined some applicants needed additional assistance and referred them to the SBA, however, not all referrals completed SBA applications.

Table 30: FEMA Referrals	
FEMA Applicants Referred to SBA	15,401
Total SBA Applicants	2,175
FEMA referrals that did NOT apply to SBA	13,226

There are a variety of reasons the FEMA applicants did not apply for to the SBA for assistance. One reason is the homeowner knew they could not afford a loan payment and did not apply. Another is the application process is complex, and some FEMA applicants could not navigate through the process. It is highly probable this group of people have unmet needs.

13,226 (FEMA referrals that did not apply to SBA) x \$19,700 (median SBA loan amount) = \$260,552,200 in unmet need.

SBA Applicants Not Approved for Funding

Table 31: SBA Applications	
Total SBA Applications	2,175
SBA Applications Approved	743
SBA Applications Declined	1,432

To be approved for a SBA loan the following criteria is required of the damaged property applicant:

1. Applicants must have a credit history acceptable to SBA.
2. Applicants must show the ability to repay all loans.
3. Collateral is required for physical loss loans over \$25,000 and all EIDL loans over \$25,000. SBA takes real estate as collateral when it is available. SBA will not decline a loan for lack of collateral, but requires you to pledge what is available.
4. Applicants who did not comply with the terms of a previous SBA loan may be considered ineligible. This includes borrowers who did not maintain flood and/or hazard insurance on previous SBA loans.

According to the SBA, “the majority of the declines are due to low credit scores. Applicants with credit score below the SBA’s limit are automatically declined.”⁵ **Many of the applicants in the affected areas are not able to meet the SBA’s criteria.**

1,432 (declined SBA applicants) x \$19,700 (median SBA loan amount) = \$28,210,400 in unmet need.

⁵ <https://www.sba.gov/sites/default/files/articles/sba-disaster-loans-faq.pdf>

These totals less the FEMA Repair and Replacement (\$5.8M) and SBA (\$23.7M) aid provided gives the remaining unmet need for housing for the 2017 disasters is approximately \$328,955,736.

\$26,727,436		\$331,728,300		\$29,500,000		
Total unmet housing needs (Traditional Calculation)	+	Total Unmet Needs of Population Under- represented in FEMA/SBA data	-	Funds provided by FEMA/SBA	=	\$328,955,736

4B: Infrastructure Impact and Unmet Needs

Infrastructure damage occurred in areas along the coast and throughout many areas of South Georgia due to 2017 disaster events. Roadways, bridges, water control facilities, utilities, sections of the coastline, and many other infrastructure systems were affected. While conducting initial meetings with the impacted communities it was clear that the 2017 disasters affected each area differently. The straight-line wind damage from tornadoes is often easier to assess than the damage from the rising flood waters as a result of the hurricane. Communities along the coast affected by Hurricane Irma stated they were suffering from more infrastructure issues than housing. Because of this, DCA expects to see more applications from these areas for the mitigation portion of the DR funds. Using FEMA and GEMA data, The Georgia Department of Community Affairs has preliminarily identified more than 1,540 damaged infrastructure sites with a total estimated repair cost of \$175.5 million across all public assistance categories. The federal share is calculated at \$131.6 million in funding will be provided to projects that were approved.

The infrastructure categories include:

- Category A: Debris Removal
- Category B: Emergency Protective Measures
- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Buildings and Equipment
- Category F: Utilities
- Category G: Parks, Recreational and Other Facilities

Based on this data, a remaining unmet need of \$12,621,750 (applicant share) in identified infrastructure damage eligible under FEMA-PA Categories C-G remains. The State of Georgia stepped in to help offset the burden on local governments by covering 10% of their local match. This left the remaining unmet need balance of \$12,621,750 for the local communities state wide.

To calculate unmet needs for infrastructure projects, the Georgia Department of Community Affairs used data obtained from FEMA as of August 15, 2018 showing the amount needed to repair the permanent public infrastructure (Categories C to G) to their pre-storm condition. DCA will continue to work with the communities identify any remaining infrastructure unmet needs related to Hurricane Irma.

Table 32: FEMA Totals: Georgia**Public Assistance Projects by Category, 2017 Disasters**

Infrastructure Category	Estimated Cost	Estimate Federal Share	Estimate Applicant Share
A (Debris)	\$ 64,705,636.93	\$ 48,529,227.70	\$ 16,176,409.23
B (Emergency Measures)	\$ 26,668,693.94	\$ 20,001,520.46	\$ 6,667,173.49
C (Roads and Bridges)	\$ 13,027,035.62	\$ 9,770,276.72	\$ 3,256,758.91
D (Water Control)	\$ 5,222,787.34	\$ 3,917,090.51	\$ 1,305,696.84
E (Buildings and	\$ 3,279,913.86	\$ 2,459,935.40	\$ 819,978.47
F (Utilities)	\$ 60,491,704.93	\$ 45,368,778.70	\$ 15,122,926.23
G (Other)	\$ 2,123,559.81	\$ 1,592,669.86	\$ 530,889.95
Totals	\$ 175,519,332.43	\$ 131,639,499.32	\$ 43,879,833.11
Totals minus A & B	\$ 84,145,001.56	\$ 63,108,751.17	\$ 21,036,250.39
Minus State Share			\$ 8,414,500.16
Total Unmet Need			\$ 12,621,750.23

Source: <https://www.fema.gov/media-library/assets/documents/28331>

****incentive counties received 12.5 % from the State, numbers will be adjusted as information comes in.**

The tables below break down the infrastructure impact by county. Camden County and Dougherty County have the greatest number of Category C (Roads and Bridges) projects with 6 and 7, respectively. Chatham County and Glynn County each have 9 Category E (Buildings and Equipment) projects, while Dougherty County has 12. In both Tables 33 and 34, the greatest cost of projects and unmet need exists in Dougherty County.

Table 33: Public Assistance by County: Categories A and B

County	Category A		Category B		Total Projects (A+B)	
	# of Projects	Cost of Projects	# of Projects	Cost of Projects	# of Projects	Cost of Projects
Dougherty	16	\$13,366,218.85	11	\$1,969,015.75	27	\$15,335,234.60
Chatham	16	\$2,100,780.52	13	\$1,723,810.21	29	\$3,824,590.73
Camden	10	\$1,258,433.88	4	\$209,325.33	14	\$1,467,759.21
Worth	13	\$713,186.71	8	\$215,641.50	21	\$928,828.21
Cook	11	\$679,319.50	6	\$218,656.99	17	\$897,976.49
Glynn	2	\$195,858.22	7	\$579,353.86	9	\$775,212.08
McIntosh	3	\$424,101.23	3	\$253,543.76	6	\$677,644.99
Turner	4	\$408,431.98	5	\$208,138.81	9	\$616,570.79
Thomas	5	\$549,202.94	4	\$54,170.60	9	\$603,373.54
Coffee	12	\$402,055.85	7	\$105,712.47	19	\$507,768.32
Liberty	8	\$259,899.31	5	\$227,985.15	13	\$487,884.46
Charlton	6	\$118,058.36	3	\$156,978.09	9	\$275,036.45
Crisp	8	\$201,733.33	4	\$55,290.31	12	\$257,023.64
Berrien	4	\$195,234.50	3	\$19,383.35	7	\$214,617.85
Wilcox	1	\$9,336.73	2	\$5,918.00	3	\$15,254.73
Total	119	\$20,881,851.91	85	\$6,002,924.18	204	\$26,884,776.09

	C	D	E	F	G			
County	Roads & Bridges	Water Control	Bldgs & Equip.	Utilities	Other	Cost of Projects	Federal Share	Applicant Share/ Potential Unmet Need
Dougherty	7		12	6	6	\$8,665,567.62	\$6,499,175.73	\$2,166,391.89
Turner	3					\$889,398.71	\$667,049.03	\$222,349.68
Worth	5	1	3	4	3	\$791,642.80	\$593,732.12	\$197,910.68
Chatham			9	2	5	\$619,651.20	\$464,738.43	\$154,912.77
Camden	6		5		2	\$569,189.11	\$426,891.83	\$142,297.28
Liberty			1	1	2	\$516,080.55	\$387,060.41	\$129,020.14
Cook	3			1		\$432,915.10	\$324,686.34	\$108,228.76
Glynn	2		9		6	\$408,975.17	\$306,731.40	\$102,243.77
Charlton	1		1	1		\$387,912.00	\$290,934.00	\$96,978.00
Crisp	3		3	1		\$257,291.39	\$192,968.55	\$64,322.84
Thomas			1	2	2	\$201,413.83	\$151,060.38	\$50,353.45
McIntosh	2		1	1		\$181,213.49	\$135,910.12	\$45,303.37
Coffee	2		2	1		\$98,289.18	\$73,716.89	\$24,572.29
Wilcox	2			1		\$60,445.49	\$45,334.12	\$15,111.37
Berrien	-	-	-	-	-	-	-	-
Total	36	1	47	21	26	\$14,079,985.64	\$10,559,989.35	\$3,519,996.29

4C: Economic Impact and Unmet Needs

Using SBA business data to understand the financial impact to livelihoods provides a comprehensive understanding of impacts and unmet recovery needs across the state. The Small Business Administration makes low-cost disaster loans available to qualified businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume.

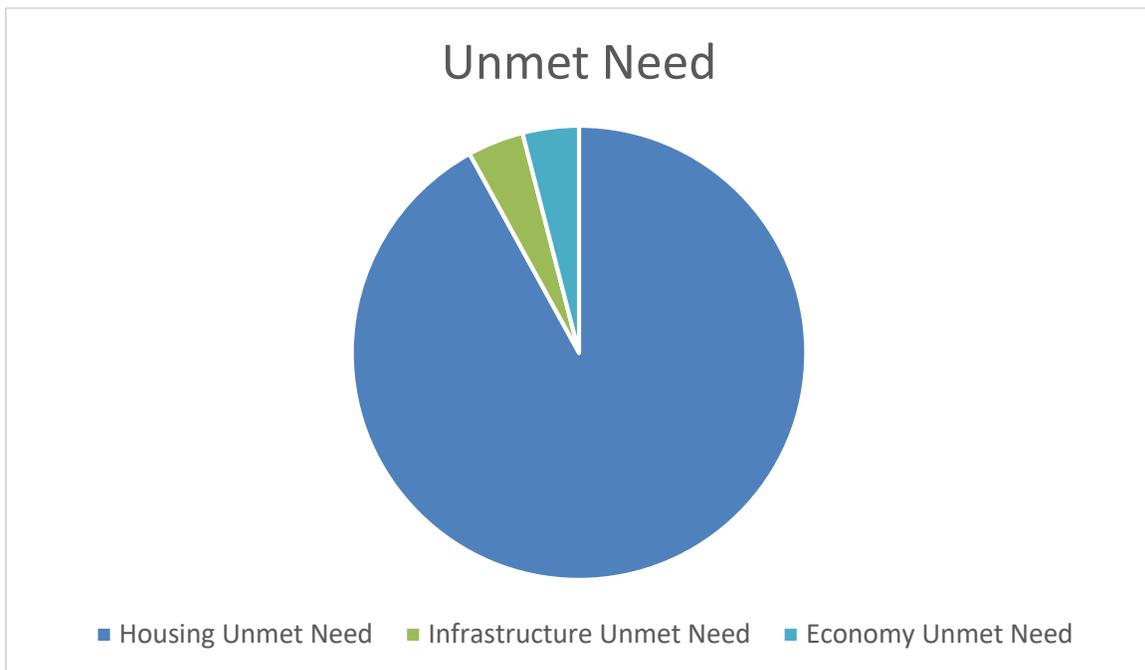
According to data provided by the SBA, more than 3,500 applicants were referred the SBA for business loans by FEMA. Of those, 264 (7.5%) applied for assistance, but only 93 were approved. The approved loans as a result of the 2017 disasters totaled \$8,008,100. An average business loan amount of \$86,108.06 was calculated by taking the total amount of loans, \$8,008,100, and dividing it 93 (the total number of loans). By taking the average loan amount and

County	FEMA Referrals	Applications Received	Applications Approved	Amount Approved
Berrien	4	2	0	\$ 0
Camden	400	46	20	\$ 1,806,000
Charlton	51	1	0	\$ 0
Chatham	1,152	29	2	\$ 98,200
Coffee	57	5	1	\$ 76,900
Cook	11	3	1	\$ 19,100
Crisp	17	6	4	\$ 679,300
Dougherty	590	101	45	\$ 4,088,100
Glynn	886	42	11	\$ 886,000
Liberty	123	8	3	\$ 97,300
McIntosh	131	11	5	\$ 220,200
Thomas	9	4	1	\$ 37,000
Turner	41	3	0	\$ 0
Wilcox	9	0	0	\$ 0
Worth	23	3	0	\$ 0
TOTAL	3,504	264	93	\$ 8,008,100

multiplying it by 171 (the number of businesses that were denied a loan), DCA calculated a total unmet business need of **\$14,724,570.97**. The SBA approved 13 Economic Injury Disaster Loans (EIDL) totaling \$843,300. Since these loans do not cover property losses, these figures were not calculated in the unmet needs data.

In sum, the following table indicates the unmet needs created by the disasters of 2017. The housing unmet needs (\$52,446,536) far exceeds the total unmet needs allocation from HUD (~~\$37,943,000~~ ~~\$50,958,596~~). To address the greatest extent of the unmet needs and improve the conditions within the impacted areas, DCA will use 26% of the total allocation to address housing and housing related issues afflicting the counties and their resident's. Being two years out of the storm, many businesses have fixed their problems, or total loss businesses are not likely to be interested. We will continue to work with the business community to identify any remaining economic unmet needs.

Table 36: Unmet Needs Summary Table				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$358,455,736	\$84,145,000	\$22,700,000	\$465,300,736
Amount of Funds Available	\$29,500,000	\$71,523,250	\$8,000,000	\$109,023,250
Unmet needs	\$328,955,736	\$12,621,750	\$14,700,000	\$356,277,486
Table 36: Unmet Needs Summary Table				
Summary of Impacts/Support	Housing	Infrastructure	Economy	Total
Amount of Estimated Impact	\$358,455,736	\$84,145,000	\$22,700,000	\$465,300,736
Amount of Funds Available	\$29,500,000	\$71,523,250	\$8,000,000	\$109,023,250
Unmet needs	\$328,955,736	\$12,621,750	\$14,700,000	\$356,277,486



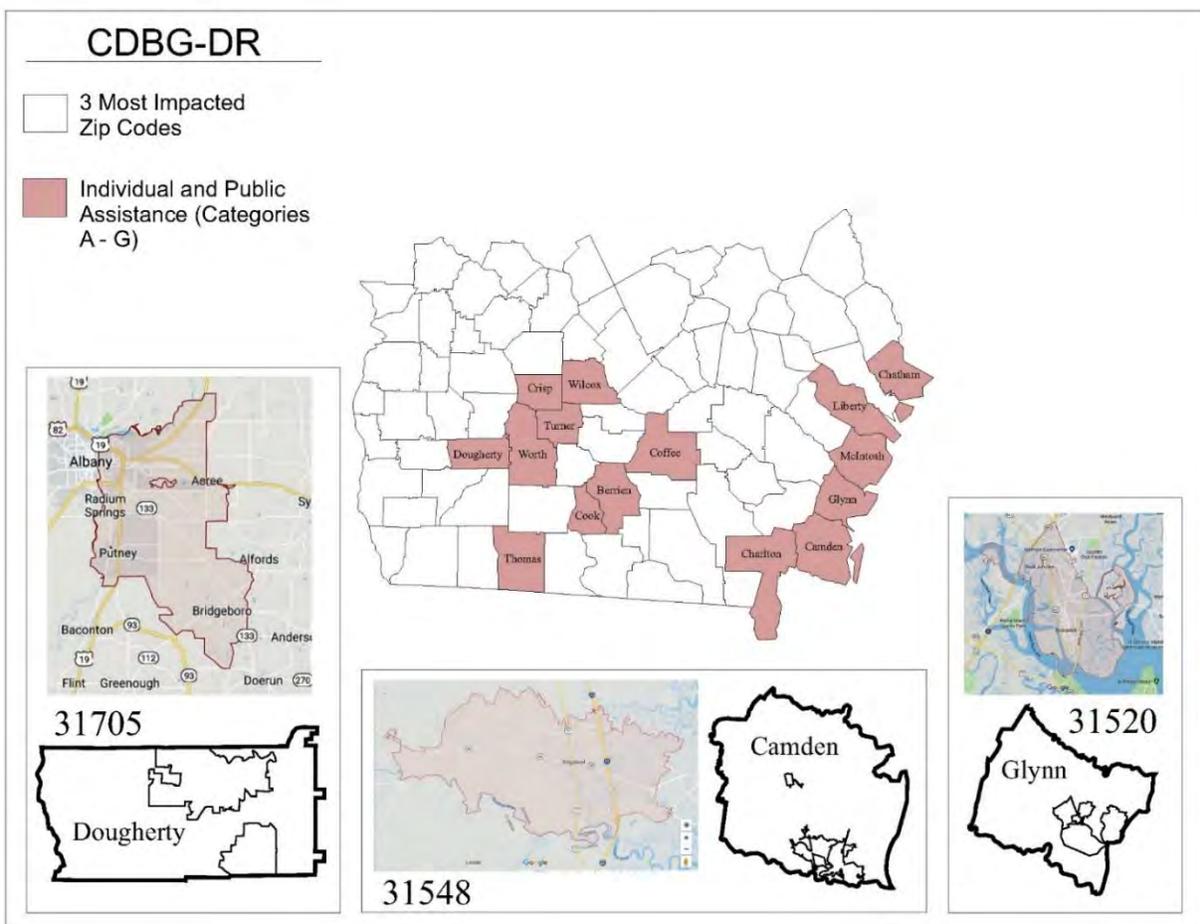
5. Funding Priorities

When the emergency declaration was issued for Georgia, 15 counties were designated for Federal Emergency Management Agency (FEMA) Public Assistance and Individual Assistance. Public Assistance grants were provided to governmental units for emergency infrastructure repairs and debris removal. Individual Assistance grants provided emergency funding to individuals to fulfill immediate housing and safety needs.

Despite many counties in Georgia being declared eligible for FEMA Individual Assistance, many people were left with their housing needs unmet. This section will detail the priorities for funding allocation and explain the justifications for creating the programs which will assist those with needs.

5A: Priorities for Funding Allocation

HUD has provided the State of Georgia with ~~\$37,943,000~~ \$50,958.596 in disaster recovery funds for unmet needs to assist in recovery efforts from the 2017 disasters. CDBG-DR funds will be used for necessary expenses related to long-term recovery, restoration and revitalization within the impacted and distressed areas resulting from the two January 2017 Tornadoes and Hurricane Irma as declared in DR-4294, DR-4297, and DR-4338. To prioritize limited funding in areas with the highest damage, HUD identified three zip codes as “most impacted and distressed” and required that a minimum of 80 percent of the allocation must address unmet needs within those areas. These zip codes, 31520, 31548, and 31705 can be seen in the map below.



In addition, 15 counties were deemed eligible for FEMA Individual Assistance and Public Assistance and are eligible for the remaining 20 percent of the funds. The 15 counties are listed in the table below:

Table 37: Counties Eligible for Assistance					
Berrien	Chatham	Crisp	Liberty	Turner	= 15
Camden	Coffee	Dougherty	McIntosh	Wilcox	
Charlton	Cook	Glynn	Thomas	Worth	

The estimated impact from the tornado events and Hurricane Irma, occurring in 2017, is \$465,300,736 across the housing, economy, and infrastructure sectors combined. The figure is based on best available data and may be adjusted in the future as additional data becomes available. After taking into account the funds already made available through insurance, state, and federal assistance, the remaining overall unmet need is approximately \$356,277,486 for all three categories. The federal allocation of ~~\$37,943,000~~ \$50,958,596 million will allow the State of Georgia to address approximately ~~11%~~ 14% of the overall unmet need.

When examining the relative need by sector, housing represents the greatest need with \$328,955,736 (92% of total) in unmet need, followed by the economy sector with \$14,700,000 (4% of total) in unmet need, and the infrastructure sector with \$12,621,750 (4% of total) in unmet need.

Federal Register notice 83 FR 40314 allows grantees to propose an allocation of funds that includes unmet economic revitalization and infrastructure needs that are unrelated to unmet housing needs after the grantee demonstrates in its needs assessment that there is no remaining unmet housing need or that the remaining unmet housing need will be addressed by other sources of funds. ~~At this time it is evident there is an abundance of unmet housing need and therefore the primary focus will be to address the housing unmet needs with these limited federal dollars.~~

DCA seeks to assist those with unmet housing needs by offering a Homeowner Rehabilitation and Reconstruction Program, Multifamily Rental Program, and a Buyout and Acquisition Program. DCA will utilize the additional \$13,015,596 allocated by HUD in January 2020 to create an infrastructure program. These programs will be discussed in detail in Section 6, Method of Distribution.

The impact the 2017 disasters had on the rental community was discussed on pages 42 and 43 in the Section 3 Impact Assessment. As mentioned on Table 13 located on page 36, there were 11,132 FEMA applicants from Glynn County, and of those, 6,405 were renters. The disaster also created a significant hole in the housing stock within the area. As mentioned on page 43, according to ACS data, in Glynn County (located within the MID area) only 21% of the total housing units within the county are vacant. With the small amount of available housing, the chances of finding decent, suitable housing are minimal. Therefore, there is a dire need to create a program to provide affordable rental housing to serve this population. This program is detailed on Page 62.

Another segment of the population DCA seeks to assist with CDBG-DR funding is homeowners. As discussed on Table 13 on page 36, the FEMA Verified losses for those affected by the 2017 disasters was greater than \$24M. These figures are an estimate of the losses and the cost to repair the structures is

much greater. Although FEMA and SBA have provided assistance, many residents have unmet needs. DCA proposes a Homeowner Rehabilitation and Reconstruction Program to assist this segment of the population. The program will allow for a maximum award amount of \$75,000 in repair costs and a maximum award amount of \$150,000 in reconstruction costs. To note, these figures include temporary relocation assistance.

While addressing homeowner and rental needs is extremely important, a focus on avoiding future losses of life and property is also crucial. Many properties located along the Coast of Georgia suffered tremendously from Hurricane Irma and are extremely vulnerable to future hurricane events. A Buyout Program to purchase properties within designated qualifying target areas will eliminate the vulnerability from future flooding. The program will support hazard mitigation, floodplain management goals, and resiliency.

The programs listed above will assist those affected by the storms and reduce the risk of future natural disasters. To ensure the funds are assisting those that have the greatest need, applications from the most socially vulnerable populations will be prioritized.

6. Method of Distribution

6A: Introduction and Allocations

The Method of Distribution is tasked with allocating resources based on multiple layers of need and prioritization. As mentioned in Section 5, a minimum of 80% of CDBG funds will be spent in the most impacted and distressed zip codes and the remainder of funds may ~~20% will~~ be spent within counties declared eligible for FEMA's individual and public assistance. Next, the funds are prioritized by programs. Due to the extent of the damage from the 2017 disasters, DCA is creating housing programs and an infrastructure program ~~are prioritized over infrastructure and economy programs~~. The following displays how the funds will be allocated: funds will be allocated to the following programs: Affordable Multifamily Rental Program (~~33%~~26%), Infrastructure (25%), Homeowner Rehabilitation and Reconstruction Program (~~21%~~16%), Buyout and Acquisition Program (~~18%~~13%), HMGP (~~8%~~6%), Planning (~~15%~~9%), and administration (5%).

~~At a minimum, \$30,354,400 must be spent within the most impacted and distressed areas. The remaining 20%, or \$7,588,600, can be spent within the 15 eligible counties. DCA is allocating \$39,216,917 of program funds to the MID Areas and \$4,472,963 to the 15-county area. The \$30,354,400 \$39,216,917 will be divided between the three zip codes based on need. For the Infrastructure Program the MIDs and 15-county area will submit applications for consideration of funding. For the Homeowner Rehabilitation and Reconstruction Program~~ there will not be competitive allocations for the MIDs, rather direct allocations will be made. The MIDs will receive an initial allocation in order to get the intake centers and case managers for the Homeowner Rehabilitation Program in order to begin receiving applications and determining eligibility. DCA will be able to see the amount of demand for the Homeowner Rehabilitation Program and will update allocations for the MIDs based on that need. For example, HYPATHETHICALLY, after one month one MID received 60 eligible applications (48%), the second received 25 (20%), and the third MID received 40 (32%). The funding allocations would be updated to give the first MID in the scenario a greater amount of the funds to carry out the activities and serve the homeowners based on the need illustrated, and the other two communities would receive amounts proportionate to their need.

Also, if needed, in the initial allocation MIDs will be given funds to allow them to determine buyout zones and complete a buyout plan for those designated target areas. These buyout plans will be submitted to DCA. In the plans the local government must identify the areas and show the amount of funds needed for the project. Based on these plans, DCA will be able to determine the amount of demand for these funds by area and make allocations accordingly.

6B: Budget

As mentioned in the introduction, a minimum of 80% of the CDBG-DR allocation will be spent within the Most Impacted and Distressed (MID) zip codes. The remaining 20% may will be spent within the 15-county area that were designated to received FEMA Individual and Public Assistance. The amounts to be spent in these categories can be seen in Table 38.

Table 38: Budget		
Area	Allocation	% of Allocation
Most Impacted and Distressed Zip Codes: 31520, 31548, 31705	\$30,354,400 <u>\$41,622,666</u>	82%
15 County Area: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, Worth	\$7,588,600 <u>\$6,788,000</u>	13%
<u>DCA – Administration</u>	<u>\$2,547,930</u>	<u>5%</u>
Total	\$37,943,000 <u>\$50,958,596</u>	100%

~~Because it is anticipated the unmet housing needs of Georgia’s most vulnerable citizens will exceed the available funding and since the Federal Register Notice requires unmet housing needs be served first, DCA will allocate all program dollars for housing recovery activities, buyout programs, planning, and administrative activities.~~ The program budget can be seen in the Table 39.

Table 39: Programs and Allocations							
Housing Program Type	Allocation	% of Allocation	MID Allocation	15-County Allocation	Amount serving LMI	LMI %	National Objective
Affordable Multifamily Rental Program	\$12,500,000 <u>\$13,470,664</u>	33% <u>26%</u>	\$10,000,000 <u>\$13,470,664</u>	\$2,500,000 <u>\$0</u>	\$12,500,000 <u>\$13,470,664</u>	100%	LMI
Home Owner Rehabilitation and Reconstruction	\$8,000,000	21% <u>16%</u>	\$6,400,000 <u>\$8,000,000</u>	\$1,600,000 <u>\$0</u>	\$5,600,000	70%	LMI/ UN
Buyout Program & Acquisition	\$6,854,400	18% <u>13%</u>	\$5,483,520 <u>\$6,854,400</u>	\$1,370,880 <u>\$0</u>	\$2,741,760 <u>\$3,084,480</u>	40% <u>45%</u>	LMB/ LMA/ UN
HMGP	\$3,000,000	8% <u>6%</u>	\$2,400,000 <u>\$1,000,000</u>	\$600,000 <u>\$2,000,000</u>	\$600,000 <u>\$1,200,000</u>	20% <u>40%</u>	LMI/ UN
Infrastructure	<u>\$12,364,816</u>	<u>25%</u>	<u>\$9,891,853</u>	<u>\$2,472,963</u>	<u>\$7,418,890</u>	<u>60%</u>	<u>LMI/ UN</u>
Total Program Budget	\$30,354,400 <u>\$43,689,880</u>	80% <u>86%</u>	\$24,283,520 <u>\$39,216,917</u>	\$6,070,880 <u>\$4,472,963</u>	\$21,441,760 <u>\$30,774,034</u>	70%	
Administration	\$1,897,150 <u>\$2,547,930</u>	5%	\$1,517,720 <u>\$0</u>	\$379,430 <u>\$0</u>	\$0		
Planning	\$5,691,450 <u>\$4,720,786</u>	15% <u>9%</u>	\$4,553,160 <u>\$3,776,629</u>	\$1,138,290 <u>\$944,157</u>	\$0		
Grand Total	\$37,943,000 <u>\$50,958,596</u>	100%	\$30,354,400 <u>\$42,993,546</u>	\$7,588,600 <u>\$5,417,120</u>	\$21,441,760 <u>\$30,774,034</u>		

6C: Connection to Unmet Needs

As detailed in the Impact and Unmet Needs Assessment section, Hurricane Irma and the two January tornadoes caused extensive loss. The estimated impact from the 2017 disaster events is approximately \$465,300,736 and, despite funds committed for emergency response and immediate recovery efforts, at least \$356,277,486 in unmet needs remain based on existing data. While the unmet needs far exceed CDBG-DR Action Plan allocations, DCA has developed several programs to serve as a framework for its overall recovery. ~~These programs will address the unmet needs in homeowners' primary residences and rental housing.~~

6D: CDBG-DR Program National Objectives

The Georgia Department of Community Affairs has designed this CDBG-DR program in compliance with the National Program objectives, and will ensure that assistance is prioritized toward the most disadvantaged populations. DCA will ensure, as is required in the Federal Register, that not less than 70 percent of the aggregate of CDBG-DR program funds be used to support activities benefitting low- and moderate-income persons. LMI status will be determined by evaluating income as a percentage of the Area Median Income (AMI) in the region in which the applicant lives using the most recent data at the time of application submission. ~~The AMI limits for each county is listed in the appendices.~~

As stewards of federal CDBG funds, the State of Georgia complies with the Department of Housing and Urban Development's (HUD) mission to develop viable communities by the provision of decent housing, a suitable living environment and expanding economic opportunities. To this end, all funded activities administered by the State of Georgia will meet one of three named HUD national objectives: benefitting LMI persons; preventing or eliminating slum or blight, or meeting urgent needs. The national objectives by program can be seen on Table 39 on page 61. Also, the national objectives and a description are listed by program below on the following page:

Buyout:

National Objective:

Low- and moderate income area benefit

Proposed buyout areas will undergo a review of eligibility to ensure that the end use of the properties results in a project service area where at least 51 percent of the residents are LMI. Homeowners will provide their income on the Buyout Intake Applications which will be verified by case managers.

Low/Mod Buyout (LMB)

When CDBG-DR funds are used for a buyout award to acquire housing owned by a qualifying LMI household, where the award amount is greater than the pre-disaster fair market value of that property

Urgent Need

An urgent need exists because existing conditions pose serious and immediate threat to health/welfare of community, the existing conditions are recent or recently became urgent. If the activity addresses the serious threat to community welfare following the disaster and the household assisted is above 80% AMI.

Housing Rehab and Reconstruction:

Low- and moderate-income benefit

At a minimum, 70 percent of program funds will meet a low- and moderate-income national objective.

Households with income higher than 120 percent of AMI will not be eligible for this program. Applicants will declare their income on the intake application, the income will be verified by case managers. Applicants with incomes greater than 80% and less than 120% will be served under the Urgent Need objective.

Affordable Multifamily:

National Objective: Low- and moderate-income benefit

At least 51% of the Affordable Multi-family units using CDBG-DR funds will be reserved for those individuals at or below 80 percent of AMI.

Infrastructure:

National Objective: Low- and moderate-income benefit and Urgent Need

6E: Duplication of Benefits

In accordance with the Robert T. Stafford Act, as amended, the DCA will implement policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to recover from 2017 Presidentially Declared Disasters. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss for which the person has received financial assistance under any other program, from private insurance, charitable assistance or any other source. To prevent duplication of benefits, DCA will require that all sources (federal, state, local, private, charitable) and amounts of disaster assistance received or reasonably anticipated are documented with submission of an application for CDBG-DR funding. DCA will monitor and review information provided to determine what, if any, duplication may occur. Applicant awardees must subrogate any additional funds received for damage caused by the presidentially declared disasters back to DCA.

6F: Public Services:

Due to the overwhelming unmet ~~housing~~ need, DCA will implement programs to serve those needs. DCA will enter into subrecipient agreements with qualified non-profit agencies to provide legal services to individual applicants for the Homeowner Rehabilitation and Reconstruction Program. Consideration will also be made for citizens with communication limitations, disabilities, those in need of mental health services, and general health services, translation services as the need arises.

6G: Eligible Activities:

Homeowner Rehabilitation and Reconstruction: Section 105(a)(4) of the HCD Act is for Housing Rehab and is also clarified in the February 9, 2018 Federal Register Notice (83 FR 5844) under the “Clarification of disaster-related activities” “housing” section.

Buyouts: All buyout activities are a type of acquisition of real property (as permitted by section 105(a)(1) of the HCD Act and addressed in the “Acquisition of real property; flood and other buyouts” section in the February 9, 2018 Federal Register Notice (83 FR 5844)

Affordable Multi-family Rental: This activity is addressed in the B.34 “Addressing Unmet Affordable Rental

Housing Needs” section in the February 9, 2018 Federal Register Notice (83 FR 5844).

HMGP Match: Section 105(a)(9) (9) payment of the non-Federal share required in connection with a Federal grant-in-aid program undertaken as part of activities assisted under this title.

Infrastructure: 24 CFR § 570.201

6H: Planning

~~All programs will incorporate, where applicable, appropriate mitigation measures and floodplain management. The programs will promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially construction standards and land-use decisions that reflect responsible floodplain and wetland management and consider continued sea level rise, when applicable; and coordinate with other local and regional planning efforts to ensure consistency.~~

~~There is a need to build on going resiliency strategies in coordination with local governments for a more targeted investment and updated unmet needs assessment. Planning will be needed to determine and support buyout acquisition strategies, including coordination with Georgia Emergency Management and Homeland Security Agency (GEMA) for the Hazard Mitigation Grant Program match. GEMA has developed a comprehensive hazard mitigation strategy that seeks to eliminate or reduce risk and vulnerability to natural hazards in the State of Georgia. The strategy provides the framework for hazard mitigation strategies and actions undertaken by local and state governments within the State of Georgia. The plan is available at:-~~

~~https://gema.georgia.gov/sites/gema.georgia.gov/files/related_files/document/2014%20GHMS.pdf~~

66H: Affordable Multifamily Rental Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons [24 CFR 270.208(a)(3)]

CDBG-DR ALLOCATION: ~~\$12,500,000~~ \$13,470,664

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist up to ~~200~~ 340 low and moderate income households.

Proposed Start Date: 2019

Proposed End Date: ~~2020~~ 2021

Maximum Award: \$6,000,000

Because rental units house ~~such~~ a high ~~percent~~ percentage of underserved residents, DCA has allocated ~~33%~~ 26% of the CDBG-DR budget to serve rental replacement. This program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the disasters. The provision of safe, disaster resistant housing for residents impacted by the 2017 disasters is critical to the long-term recovery strategies of the eligible areas. The program's eligible activities will include rehabilitation of existing affordable rental housing or construction of new rental housing units in areas impacted by Hurricane Irma and the two January tornadoes of 2017. The Affordable Rental Multifamily Program will facilitate the creation of quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by the storms. In an effort to have the greatest impact, achieve maximum leverage of and depending of readiness of the projects, Low-Income Housing Tax Credit projects will be given priority.

The Affordable Multifamily Rental Program will include the following:

- A set aside of approximately ~~\$2.1~~ \$3.4 million in new Federal LIHTC credits with matching Georgia State credits will be allocated under Georgia's 2019 Qualified Allocation Plan.
- ~~\$12.5 million~~ \$13,470,664 of CDBG-DR funds will be designated to leverage Low Income Housing tax credits in accordance with CDBG-DR Requirements. LIHTC properties eligible for this loan program include properties allocated new credits under the 2019 set aside and properties with an award of 2017 and 2018 credits that have a funding gap or have the ability to add units with additional funds
- ~~Approximately \$31.5M of equity generated by the sale of \$2.1 million of ten-year federal and state credits~~
- Federal LIHTCs flow over 10 years. In addition, Georgia has a matching State LIHTC which is paired with every Federal LIHTC award. As a result, DCA's award of \$3.4 million in Federal 9% LIHTCs and \$13.5 million in CDBG-DR funds generated \$47 million in private funding for the new construction and rehabilitation of 340 affordable apartment homes.

DCA will issue a general NOFA for this program in the beginning of 2019 that will include the following:

- Developments eligible for CDBG-DR awards will be new construction and/or re-development/rehabilitation of uninhabitable dwellings
- Underwriting requirements that ensure the long term financial sustainability of the properties
- Construction and Rehabilitation standards

- A minimum affordability period of fifteen (15) years for the rehabilitation or reconstruction of multi-family rental projects with eight or more units, and a minimum affordability period of twenty (20) years for the new construction of multi-family rental units with five or more units
- Any new/rehabilitated multifamily rental housing utilizing LIHTC will be required to meet the 15 year compliance period and 15 year Extended use period for affordability
- Properties will be monitored for compliance with all statutory regulations and DCA/GHFA program requirements by GHFA's Compliance and Portfolio Management Office

Affordability

The affordability requirement requires the property owner to lease a percentage of units to LMI households earning 80% or less of the AMI and to lease the units at affordable rents. Affordable Rents are the maximum gross rents for the Low Income Housing Tax Credit and HOME Program. The 2018 rents can be seen at the following link:

https://www.dca.ga.gov/sites/default/files/2018novdca_ohf_programmaximumrents.pdf

A minimum of 51% of the total units will be rent restricted. Three options are available for meeting the rent restrictions requirement:

1. 20/50 Test: No less than 20% of the housing units must be set aside for tenants whose incomes are 50% or less of the area median income; or
2. 40/60 Test: No less than 40% of the housing units must be set aside for tenants whose incomes are 60% or less of the area median income.
3. Income Averaging: 3. Income Averaging: At least 40 percent of the units have to be both rent-restricted and occupied by individuals whose incomes do not exceed the designated income limitation.

The average of the imputed income limitations designated cannot exceed 60 percent of AMI. The designated imputed income limitations must be in 10 percent increments as follows:

20% | 30% | 40% | 50% | 60% | 70% | 80%

Income Limits for Tenants

HUD's income limits for 80%AMI will be used in the Affordable Multifamily Rental Program to determine low-to-moderate income status.

Leasing Priority

DCA will promote housing for vulnerable populations. In the Affordable Multifamily Rental Program, vulnerable populations will be given leasing priority of the rent restricted units. Vulnerable populations are the elderly (over age 62), persons with disabilities, families with children (under age 18), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents.

DCA will be administering the Affordable Multifamily Housing Program Directly. The other programs, Buyout and Homeowner Rehabilitation will be administered by the local government sub recipients.

Eligibility Requirements:

1. Project must be located within Most Impacted and Distressed Areas or one of the 15 counties eligible for FEMA’s Individual and Public Assistance.
2. If any choice-limiting actions have occurred the application would be considered ineligible.
3. The development must be a Low Income Housing Tax Credit Project.

Selection Criteria:

Developments will be selected for funding based on the eligibility and selection criteria is listed below:

- A. Readiness to Proceed (15 Points)
- B. Risk Mitigating Factors (15 Points)
Repayment of CDBG-DR modeled cash flow and DCA Core Application shows full amortization of loan over 20 years Commitment of Project Based Rental Assistance (PBRA) for at least 10% of the units
CDBG-DR funds in first position
- C. Developer has experience with Disaster and/or HOME funds (15 Points)
- D. Leverage of additional funds outside of Housing Tax Credit Equity and requested CDBG-DR funds (20 Points)
- E. Deeper targeting (25 pts)
 1. Points will be awarded to Applications with an overall property area median income, calculated based on the imputed income and rent limitations (20%, 30%, 40%, 50%, 60%, 70%, 80%) for each affordable unit, equal to or less than 58%. Applicants may do so by utilizing either
 - a. Income averaging, or
 - b. The 40% at 60% minimum set-asides and targeting units at lower levels. (PBRA and public housing units can be used to claim points in this category).
- F. Extended affordability commitment (10 Points)
 1. Ten (10) points will be awarded to Owners willing to forgo the Qualified Contract "cancellation option."
 2. Five (5) points will be awarded to Owners willing to forgo the Qualified Contract "cancellation option" for at least 10 years.

Awarded Developments:

The Georgia Department of Community Affairs awarded 9% Housing Tax Credits (“LIHTCs”) and CDBG-DR funds to 4 developments located in the City of Albany (1 development), City of Brunswick (1 development), and the City of Kingsland (2 developments). The 9% Low income Housing Tax Credits (LIHTCs) for the 4 developments total \$3.4 million, and the CDBG-DR funds for the 4 development total \$13.5 million.

<ul style="list-style-type: none">• <u>Arbours at Kingsland</u> <u>Near 821 South Grove Blvd</u> <u>Kingsland, GA 31548</u> <u>84 Low Income Units - New Construction</u> <u>CDBG-DR Award: \$3,675,000</u> <u>9% Tax Credit Award: \$900,000</u>	<ul style="list-style-type: none">• <u>Perry Place</u> <u>Near 2435 Martin Luther King Jr. Blvd</u> <u>Brunswick, GA 31520</u> <u>56 Low Income Units - New Construction</u> <u>CDBG-DR Award: \$2,000,000</u> <u>9% Tax Credit Award: \$850,000</u>
--	---

<ul style="list-style-type: none"> • <u>Grove Park Apartments</u> <u>Near 301 Gross Rd.</u> <u>Kingsland, GA 31548</u> <u>80 Low Income Units - New Construction</u> <u>CDBG-DR Award: \$4,170,000</u> <u>9% Tax Credit Award: \$694,500</u> 	<ul style="list-style-type: none"> • <u>Havenwood Springs</u> <u>525 Don Cutler Sr. Dr.</u> <u>Albany, GA 31705</u> <u>120 Low Income Units – Substantial Rehabilitation</u> <u>2 Common Space Units - New Construction</u> <u>CDBG-DR Award: \$2,284,339</u> <u>9% Tax Credit Award: \$1,000,000</u>
---	---

Additional Funds for Havenwood Springs:

To ensure the viability of the project, DCA committed an additional \$970,664 in CDBG-DR funds to the Havenwood Springs Development. These funds were moved from the planning allocation. Havenwood Springs is composed of single-story and two-story existing buildings, totaling 120 units; as well a free-standing clubhouse building. The costs for relocating existing tenants has increased since the initial estimate. Havenwood Springs is working with a relocation specialist to minimize permanent relocation for existing tenants.

The estimated cost of the rehabilitation has also increased since the initial application. The project scope entails regrading and repairs to site infrastructure and hardscapes, as well as interior and exterior rehabilitation work.

Planning Decisions:

DCA will require applicants in the Affordable Multifamily Program to conduct a market study illustrating the need for affordable housing within the project area. A summary of the requirements of the Market Study is listed below:

Project Description: A description of the project location and surrounding areas, site description, unit mix including bedrooms, bathrooms, square footage, description of proposed amenities and how they compare to existing properties.

Description: A description of physical features of the site and adjacent parcels, an overview of the neighborhood land composition, a discussion of site access and visibility, a summary of the site’s proximity to neighborhood services including shopping, medical care, employment concentrations, public transportation, etc., a discussion of public safety, including comments on local perceptions, maps, or statistics of crime in the area

Community Demographic Data and Economic Data: Current and projected household and population counts for the Primary Market Area (PMA), household income levels, employment by sector for the market area, unemployment trends.

Demand Analysis: Number of renter household’s income qualified for the proposed development given retention of current tenants (rehab only), the proposed unit mix, and rents, overall estimate of demand.

Absorption/Stabilization Estimate: An estimate of the number of units expected to be leased at the subject property, on average, per month, number of months required for the project to stabilize at 93% occupancy.

Note, this is a summary of the requirements of the Market Study. A complete listing of requirements will be published in the Notice of Funds Available and/or application guidance for the Affordable Multifamily Rental Program.

616: Homeowner Rehabilitation and Reconstruction Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons [24 CFR 270.208(a)(3) & Urgent Need

CDBG-DR ALLOCATION: \$8,000,000

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist 150 households.

Proposed Start Date: ~~2019~~ 2020

Proposed End Date: ~~2021~~ 2022

Maximum Award: Rehabilitation \$75,000 | Reconstruction: \$150,000

To assist the most vulnerable families in their recovery efforts, DCA has developed a CDBG-DR Homeowner Rehabilitation and Reconstruction Program to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster resistant housing for residents impacted by the 2017 disasters. This program is critical to the long-term recovery strategies of the eligible areas.

The program consists of:

- Rehabilitation or reconstruction of existing or destroyed housing units
- Temporary Housing Assistance based on individual household needs and their participation in the Housing Repair and Reconstruction Program will be awarded on a case-by-case basis.

Applicant criteria

All applicant homeowners will be held to the following criteria as conditions of eligibility:

- Must be primary resident homeowner, no second homes allowed
- ~~A control measure will be put in place in the policies and procedures to prevent the resale of rehabilitated homes solely for profit.~~
- The use of a deferred payment loan with incremental forgiveness over a 5 year period has been put in place in the policies and procedures to prevent the resale of rehabilitated homes solely for profit.
- Only homeowners who either maintain flood insurance or have incomes under 120% of the Average Median Income may qualify for rehabilitation assistance. However, to receive assistance and remain in the floodplain, flood insurance must be maintained.

Prioritization Criteria

Due to limited time and resources, Priority will be given to applications from households in the Homeowner Rehabilitation Program based on LMI status, the presence of household members over the age of 62, presence of household members with a disability, and households with children (under 18). For a period of 45 days applications from those prioritized households will be processed. All priorities are weighted equally and will not be allowed overlap. Either an application is prioritized or it is not. Applications from non-prioritized households may be submitted, but will not be processed or awarded funds until after this 45 day period.

Non-Profit Subrecipients

DCA hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove obstacles to applicant participation. DCA may enter into subrecipient agreements with the agencies so that housing counseling and legal services are provided and complete applications can be made.

NFIP Requirement

Rehabilitated homes inside the 100-year floodplain must be insured under a policy of flood insurance in the amount of the lesser of either the full insurable value of the structure as determined by the applicable property insurer, or the maximum amount available for the structure under the National Flood Insurance Program. The full insurable value of the structure will be based upon the program's final total project cost for the applicant. Failure to maintain flood insurance will result in an applicant's property to be ineligible for future disaster relief. Upon the sale or transfer of the property, applicants will, on or before the date of transfer, notify all transferees in writing of the continuing obligation to maintain flood insurance on the property, and include the requirement on all documents and deeds.

Elevation

The average cost of elevating a home can range from \$20,000 to \$100,000, depending on many different factors of the project. Taking these averages into consideration, elevations will be allowed up to \$50,000 and on a case by case basis, as to ensure the method is cost effective. If the amount exceeds this cap, the Buyout Program may be a more suitable option. DCA may re-evaluate the elevation costs caps during the implementation of the Homeowner Rehabilitation Program based on average costs associated with elevating homes and on a case by case basis as needed.

When elevation occurs, the subrecipient must ensure the accessibility for persons with disabilities is preserved.

Elevation standards will be required if the structure is substantially damaged or substantially improved.

Not Suitable for Rehabilitation:

~~The definition of "not suitable for rehabilitation" will be defined in the policies and procedures governing the program. DCA has defined "not suitable for rehabilitation" in the program manual for the Homeowner Rehabilitation and Reconstruction Program.~~

Temporary Relocation

~~A Temporary relocation assistance policy is being developed. This policy is expected to be completed in April 2019. The policy will be complete before applications will be accepted for the Homeowner Rehabilitation Program.~~

~~The Temporary Relocation Assistance policy is included in the program manual for the Homeowner Rehabilitation and Reconstruction Program.~~

Exemptions:

Exemptions to the Homeowner Rehabilitation Program award maximums will be granted on a case-by-case basis.

Application Status

Applicants will be able to determine application status through the case managers. DCA's website will include a listing of all intake centers and phone numbers of the centers.

DCA has defined "Ineligible activities" ~~will be defined~~ in the program guidelines governing the program.

6K6J Buyout and Acquisition Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons or households and Urgent Need (24 CFR 570.208(a); and, 24 CFR 570.208(c)).

CDBG-DR ALLOCATION: \$6,854,400

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to buyout or acquire 65 units

Proposed Start Date: ~~2019~~ 2020

Proposed End Date: ~~2021~~ 2022

Program Maximum: Buyouts and acquisitions will be capped at the ~~FHA Mortgage Limit for the county where the property is located~~ post-storm Fair Market Value (FMV) as determined by appraisals.

DCA will support local implementation of a voluntary Buyout and Acquisition Program using CDBG-DR funds to support hazard mitigation, floodplain management goals, and resiliency goals by purchasing properties eligible storm impacted and severely damaged properties within designated qualifying target areas prone to flooding events. This program is vital to the long-term strategy of the region by eliminating vulnerability to future flooding situations disasters.

Buyout ~~Program serves~~ activities serve multiple objectives and ~~provides~~ provide a resiliency option versus rebuilding within a floodplain. ~~Buyouts-These activities~~ help prevent repetitive loss and extreme risk to human health and safety. Buyouts will be based on the pre post-storm Fair Market Value (FMV), minus any duplication of benefits for structural repairs that are not offset by receipts. Per FR Notice and HUD guidelines 83 FR 5844, buyouts must remain permanent open space with limited redevelopment allowed for recreational or public use.

Acquisition activities give local communities the flexibility and capacity to acquire real property for any public purpose, as set forth by 24 CFR 570.201(a)). Acquisitions will be based on the post-storm Fair Market Value (FMV).

DCA requires subrecipients to create a plan for The Buyout and Acquisition Program where ~~the subrecipients target areas~~ will be required to identified and must discuss the ways in which the program activities would lessen area racial, ethnic, and low-income concentrations, and/or promote affordable housing in low-poverty, non-minority areas in response to natural hazard related impacts. ~~After the buyout zones are determined the local government will contact residents within the area to invite them to participate. The homeowner will work with case managers to fill out an application. Applicants will be able to determine application status through the case managers. DCA's website will include a listing of all intake centers and phone numbers of the centers. DCA will review all plans for compliance before funds are committed to the activity.~~

As properties are negotiated for acquisition or buyout, existing tenants are entitled to relocation assistance as per URA and HUD approved guidelines. Section 414 of the Stafford Act (42 U.S.C. 5181) provides that "Notwithstanding any other provision of law, no person otherwise eligible for any kind of replacement housing payment under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 shall be denied such eligibility as a result of his being unable, because of a major

disaster as determined by the President, to meet the occupancy requirements set by [the URA].” Accordingly, homeowner occupants and tenants displaced from their homes as a result of the identified disasters and who would have otherwise been displaced as a direct result of any acquisition, rehabilitation, or demolition of real property for a federally funded program or project may become eligible for a replacement housing payment notwithstanding their inability to meet occupancy requirements prescribed in the URA.

Section 414 of the Stafford Act (including its implementing regulation at 49 CFR 24.403(d)(1)), is waived to the extent that it would apply to real property acquisition, rehabilitation or demolition of real property for a CDBG-DR funded project commencing more than one year after the date of the latest applicable Presidentially declared disaster undertaken by the grantees, or subrecipients, provided that the project was not planned, approved, or otherwise underway prior to the disaster. For purposes of this paragraph, a CDBG-DR funded project shall be determined to have commenced on the earliest of: (1) The date of an approved Request for Release of Funds and certification, or (2) the date of completion of the site-specific review when a program utilizes Tiering, or (3) the date of sign-off by the approving official when a project converts to exempt under 24 CFR 58.34(a)(12) The Department has determined that good cause exists for a waiver and that such waiver is not inconsistent with the overall purposes of title I of the HCD Act.

The waiver will simplify the administration of the disaster recovery process and reduce the administrative burden associated with the implementation of Stafford Act Section 414 requirements for projects commencing more than one year after the date of the Presidentially declared disaster considering most of such persons displaced by the disaster will have returned to their dwellings or found another place of permanent residence. This waiver does not apply with respect to persons that meet the occupancy requirements to receive a replacement housing payment under the URA nor does it apply to persons displaced or relocated temporarily by other HUD-funded programs or projects. Such persons’ eligibility for relocation assistance and payments under the URA is not impacted by this waiver.

Applicants will be able to determine application status by contacting local government subrecipients. If the applicant is unable to receive an update via this method, the applicant shall contact DCA using the contact information below:

Georgia Department of Community Affairs
Community Development Block Grant – Disaster Recovery
Phone: 404-679-4840
Email: CDBG-DR@dca.ga.gov
Mail: 60 Executive Park South, NE
Atlanta, GA 30329

A resettlement incentives program will be allowed based on need and surrounding market conditions based on area.

~~**Detailed policies and procedures for the Buyout Program will be developed at a later date.**~~

~~**DCA will define “not suitable for rehabilitation” in the policies and procedures.**~~

More details regarding the Buyout and Acquisition Program, including definitions for “not suitable for rehabilitation”, can be found in the Buyout and Acquisition Program Manual.

6K HMGP Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons or households and Urgent Need (24 CFR 570.208(a); and, 24 CFR 570.208(c)).

CDBG-DR ALLOCATION: \$3,000,000

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist 70 households

Proposed Start Date: 2020

Proposed End Date: 2021

Program Maximum: 15% of HMGP Project Cost

The HMGP will assist local governments with their portion of the required HMGP match. On November 2, 2018, DCA made a request to HUD to allow DCA to allocate a portion of the CDBG-DR funds to match Hazard Mitigation Grant Program Activities. The HMGP requires a 25% non-federal match, the Georgia Emergency Management and Homeland Security Agency covers 10% of this match and the local governments are responsible for the remaining 15%. The disaster events of 2017 weakened revenues within these communities which were needed to pay the local match causing community recovery efforts to stall. Match funding activities will meet CDBG-DR and HMGP eligibility requirements. ~~HMGP-match projects are limited to structural elevation and debris removal.~~ Applicants will be required to submit applications to the Georgia Emergency Management Division. Ineligible activities will be defined in the program guidelines.

Mixed-financed projects may come with different requirements and the most restrictive requirements must be followed.

If HMGP funds are used in a project where acquisition, rehabilitation or demolition will occur the project will be subject to the standard URA regulations.

6L: Infrastructure Program

NATIONAL OBJECTIVE: Benefit to low- and moderate-income persons or households and Urgent Need

CDBG-DR ALLOCATION: \$12,364,816

PROJECTED ACCOMPLISHMENTS: The State estimates it will be able to assist 600 individuals

Proposed Start Date: 2021

Proposed End Date: 2024

Program Maximum: No project maximum for MID Area; \$750,000 for 15-county area

Administering Entity: Local Government Subrecipients – Competitive awards based on applications

Program Summary

The goal of the CDBG-DR Infrastructure Program is to fund infrastructure projects in communities impacted by the 2017 tornadoes and Hurricane Irma. Projects funded under this program may include, but are not limited to, water/sewer/stormwater, streets/bridges, drainage systems, and facilities. DCA will encourage activities related to storm water management in flood-impacted areas. Specifically, DCA will work with the MID areas directly to identify unmet needs and associated costs of needed storm water infrastructure. DCA will also encourage subrecipients to incorporate mitigation measures to reduce future risk to the jurisdiction. Activities funded through this program must have a tie back to the disaster. DCA will rely on professional engineers, procured by the subrecipients, to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure and ensure that the construction or rehabilitation of storm water management systems in flood areas will mitigate future flood risk. DCA will evaluate each application to ensure alignment with other planned state or local capital improvements and infrastructure development efforts.

Eligibility Requirements:

1. Project must be located within Most Impacted and Distressed Areas or one of the 15 counties eligible for FEMA's Individual and Public Assistance.
2. If any choice-limiting actions have occurred the application would be considered ineligible.
3. Further details regarding eligibility criteria will be detailed in the CDBG-DR Infrastructure Applicant's Manual. This Manual will be provided to eligible local governments prior to the application period.

Ineligible Activities and Applicant Eligibility Criteria

Ineligible activities will be defined in the CDBG-DR Infrastructure Applicant's Manual.

Consideration of Costs and Benefits

DCA will encourage subrecipients to consider the costs and benefits of the project when selecting CDBG-DR eligible projects. This will be completed by encouraging subrecipients to perform a self-assessment of each proposed project and selecting the project(s) that provide(s) the greatest impact within the confines of the budgeted grant amount.

Affirmatively Furthering Fair Housing

Proposed activities will undergo Affirmatively Furthering Fair Housing (AFFH) review before approval. Such review will include an assessment of the proposed project area's demography, socioeconomic characteristics, environmental hazards or concerns and other factors material to the AFFH determination. Activities should lessen area racial, ethnic, and low-income concentrations and/or promote affordable housing in low- poverty, non-minority areas in response to natural hazard-related impacts, where applicable.

~~6.6M~~: Planning and Administration Activities

CBDG-DR Allocation: Planning - ~~\$5,691,450~~ \$4,720,786 | Administration - ~~\$1,897,150~~ \$2,547,930
Proposed Start Date: ~~2018~~ 2020
Proposed End Date: ~~2022~~ 2024

Planning

All programs will incorporate, where applicable, appropriate mitigation measures and floodplain management. The programs will promote sound, sustainable long-term recovery planning informed by a post disaster evaluation of hazard risk, especially construction standards and land-use decisions that reflect responsible floodplain and wetland management and consider continued sea level rise, when applicable; and coordinate with other local and regional planning efforts to ensure consistency.

Communities within the Most Impacted and Distressed Zip Codes will be eligible to receive an allocation to carry out planning activities. ~~This allocation will allow the communities to perform application intake in order to determine the homeowner rehabilitation and reconstruction needs within the community. This allocation will also allow the communities to develop strategies and define target areas for the Buyout Program.~~ Subrecipient Planning activities may include efforts which support post-disaster recovery planning.

A portion of the planning funds will be utilized by DCA for the costs associated with, but not limited to, developing the Action Plan, subsequent amendments, and program guidelines.

There is a need to build on-going resiliency strategies in coordination with local governments for a more targeted investment and updated unmet needs assessment. Planning will be needed to determine and support buyout acquisition strategies, including coordination with Georgia Emergency Management and Homeland Security Agency (GEMA) for the Hazard Mitigation Grant Program match. GEMA has developed a comprehensive hazard mitigation strategy that seeks to eliminate or reduce risk and vulnerability to natural hazards in the State of Georgia. The strategy provides the framework for hazard mitigation strategies and actions undertaken by local and state governments within the State of Georgia. The plan is available at:

https://gema.georgia.gov/sites/gema.georgia.gov/files/related_files/document/2014%20GHMS.pdf

Administration

As stated in the Federal Register Notice, grantees can use up to 5% of the total grant award for grant administration. This allocation will cover DCA's administrative costs to run the program ~~and is designated for the local government subrecipients and DCA.~~ Costs incurred by local government subrecipients to run the programs will be charged as Activity Delivery Costs.

~~DCA encourages communities to consider post-disaster recovery planning. This is an allowable expense under the planning allocation.~~

6L6N: Expenditure Schedule

Table 40: Unmet Needs Expenditure Schedule								
Quarter/Year	Admin	Planning	Affordable Multifamily Rental Housing	Homeowner Rehabilitation	Buyout Program	HMGP Local Match	Infrastructure	100%
Q4 2018		\$200,000 \$0						0.53% 0.0%
Q1 2019		\$550,000 \$0						1.45% 0.0%
Q2 2019	\$45,000 \$0	\$650,000 \$0				\$750,000 \$0		1.83% 0.0%
Q3 2019	\$105,000 \$20,374.99	\$750,000 \$249,141.04	\$3,500,000 \$0	\$200,000 \$35,780.09	\$200,000 \$4,941.61	\$750,000 \$0		13.32% 3.6%
Q4 2019	\$155,000 \$82,776.52	\$850,000 \$14,616.27	\$5,000,000 \$0	\$500,000 \$10,070.07	\$400,000 \$2,695.77	\$750,000 \$0		20.17% 6.1%
Q1 2020	\$127,150 \$31,137.46	\$550,000 \$61,882.25	\$4,000,000 \$0	\$1,000,000 \$19,825.30	\$1,000,000 \$4,009.60	\$750,000 \$0		20.23% 10.0%
Q2 2020	\$150,000 \$47,874.80	\$550,000 \$120,000.00		\$1,750,000 \$56,670.64	\$1,500,000 \$88,000.00			11.07% 8.4%
Q3 2020	\$125,000	\$450,000 \$500,000.00	\$1,500,000.00	\$2,000,000 \$1,000,000.00	\$1,500,000 \$99,953.00	\$750,000.00		10.74% 4.9%
Q4 2020	\$115,000 \$150,000.00	\$286,450 \$500,000.00	\$3,000,000.00	\$2,000,000 \$1,000,000.00	\$1,000,000 \$400,000.00	\$750,000.00		8.96% 5.5%
Q1 2021	\$90,000 \$150,000.00	\$250,000 \$700,000.00	\$5,000,000.00	\$550,000 \$1,000,000.00	\$750,000 \$1,000,000.00	\$750,000.00		6.17% 7.1%
Q2 2021	\$85,000 \$150,000.00	\$200,000 \$700,000.00	\$3,970,664.00	\$2,000,000.00	\$504,400 \$1,500,000.00	\$750,000.00		2.08% 10.0%
Q3 2021	\$75,000 \$150,000.00	\$100,000 \$700,000.00		\$2,000,000.00	\$1,500,000.00		\$50,000.00	0.46% 8.6%
Q4 2021	\$75,000 \$125,000.00	\$95,000 \$450,000.00		\$550,000.00	\$1,000,000.00		\$150,000.00	0.45% 4.5%

Q1 2022	<u>\$75,000</u> <u>\$125,000.00</u>	<u>\$85,000</u> <u>\$300,000.00</u>		<u>\$327,653.90</u>	<u>\$750,000.00</u>		<u>\$250,000.00</u>	<u>0.42%</u> <u>3.4%</u>
Q2 2022	<u>\$75,000</u> <u>\$125,000.00</u>	<u>\$75,000</u> <u>\$100,000.00</u>			<u>\$504,802.02</u>		<u>\$250,000.00</u>	<u>0.40%</u> <u>1.9%</u>
Q3 2022	<u>\$75,000</u> <u>\$125,000.00</u>	<u>\$50,000</u> <u>\$95,000.00</u>					<u>\$1,500,000.00</u>	<u>0.33%</u> <u>3.4%</u>
Q4 2022	<u>\$75,000</u> <u>\$125,000.00</u>	<u>\$85,000.00</u>					<u>\$1,500,000.00</u>	<u>0.20%</u> <u>3.4%</u>
Q1 2023	<u>\$75,000</u> <u>\$125,000.00</u>	<u>\$75,000.00</u>					<u>\$2,500,000.00</u>	<u>0.20%</u> <u>5.3%</u>
Q2 2023	<u>\$75,000</u> <u>\$125,000.00</u>	<u>\$70,146.44</u>					<u>\$2,250,000.00</u>	<u>0.20%</u> <u>4.8%</u>
Q3 2023	<u>\$75,000</u> <u>\$125,000.00</u>						<u>\$2,250,000.00</u>	<u>0.20%</u> <u>4.7%</u>
Q4 2023	<u>\$65,000</u> <u>\$125,000.00</u>						<u>\$1,250,000.00</u>	<u>0.17%</u> <u>2.7%</u>
Q1 2024	<u>\$55,000</u> <u>\$125,000.00</u>						<u>\$414,816.00</u>	<u>0.14%</u> <u>1.1%</u>
Q2 2024	<u>\$45,000</u> <u>\$125,000.00</u>							<u>0.12%</u> <u>0.2%</u>
Q3 2024	<u>\$35,000</u> <u>\$125,000.00</u>							<u>0.09%</u> <u>0.2%</u>
Q4 2024	<u>\$25,000</u> <u>\$140,766.23</u>							<u>0.03%</u>
Total	<u>\$1,897,150</u> <u>\$2,547,930</u>	<u>\$5,691,450</u> <u>\$4,720,786.00</u>	<u>\$12,500,000</u> <u>\$13,470,664</u>	<u>\$8,000,000</u>	<u>\$6,854,400</u>	<u>\$3,000,000</u>	<u>\$12,364,816</u>	<u>\$37,943,000</u> <u>\$50,958,596</u>
Anticipated households assisted:			<u>200</u> <u>340</u>	<u>150</u>	<u>65</u>	<u>70</u>	<u>600</u>	<u>415</u> <u>1,225</u>
Cost Per Unit:			<u>\$62,500</u> <u>39,619.60</u>	<u>\$53,333</u>	<u>\$105,452</u>	<u>\$42,857.14</u>	<u>\$20,608.03</u>	

6N6P: General Requirements

~~6N1~~ 6P1: Protection of People and Property: Construction Methods

The housing assistance provided under the CDBG disaster recovery program will be built with emphasis on high quality, durable, sustainable, and energy efficient construction methods and materials. These include the following minimum standards:

- Construction standards will be based on Georgia's Construction Code Program and must meet or exceed applicable requirements.
- Construction will comply with a Green Building Standard for all new construction of residential buildings and for all repair of substantially damaged residential buildings. The state will require that all new construction or repair of substantially damaged residential buildings will meet an industry-recognized standard that has achieved certification under at least one of the programs listed in paragraph B.32.a of Section VI. (83 FR 5850 and 83 FR 5861).
- For rehabilitation of non-substantially damaged buildings (where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab), the state will follow the Green Building Retrofit Checklist. To note, this requirement does not apply when Energy star, Water-Sense Labeled, or FEMP-designated products do not exist. (83 FR 5850 and 83 FR 5861).
- DCA will provide a mechanism for homeowners to appeal the quality of the rehabilitation work. DCA will require a warranty period post-construction for housing with all work being performed by the contractor. Information about the complainant's rights and how to file a complaint or appeal regarding the quality of work will be printed on program applications and/or guidelines. Complaints should be submitted to the local government subrecipient and responded to in a timely manner. Records of each complaint will be kept on file.

~~6N2~~ 6P2: Home Elevation

The state will require the following elevation standards for new construction, repair, or substantial damage, or substantial improvement:

All structures designed principally for residential use and located in the 100-year (or 1 percent annual chance) floodplain that receive assistance, must be elevated with the lowest floor, including the basement, at least two feet above the base flood elevation. Mixed-use structures with no dwelling units and no residents below two feet above base flood elevation, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above base flood elevation.

Property owners assisted through the ~~recovery~~ [Homeowner Rehabilitation and Reconstruction](#) Program will be required to acquire and maintain flood insurance if their properties are located in a FEMA designated floodplain. This requirement is mandated to protect safety of residents and their property and the investment of federal dollars. The state will ensure adherence to Section 582 of the National Flood Insurance Reform Act regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so.

By achieving the goals within this Action Plan, initiating strong and energy efficient building codes, and requiring both residential and non-residential structures be built at least two feet above the new Advisory Base Flood Elevation (ABFE), the state guarantees a more successful long term disaster recovery, thus ensuring a strong, healthy environment and the safety and welfare of the citizens.

~~Elevation activities and eligible costs will be further defined in the program guidelines.~~

~~6N3 6P3~~: Section 8 Tenants and Housing Needs of Persons that are Homeless

DCA will encourage subrecipients to identify private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher Program; and any other housing that is assisted under a HUD program that are in need of rehabilitation, reconstruction, or replacement of. DCA will also encourage subrecipients to identify emergency shelters and transitional housing, permanent supportive housing, and permanent housing needs of individuals and families that are homeless and at-risk of homelessness. DCA has existing programs that subrecipients may refer these persons to that may be able to provide assistance.

~~6N4 6P4~~: Cost Reasonableness/Effectiveness

Cost-effectiveness will be defined in the manual for each program offered with CDBG-DR funds. ~~outlined in the Disaster Recovery Program Housing Guidelines.~~ The program guidelines for the Affordable Multifamily Rental Program will detail the controls for housing projects involving eight or more units.

~~6N5 6P5~~: Demonstrable Hardship & Exceptions

DCA ~~has will further~~ developed ed detailed program guidelines in the policies and procedures for the Homeowner Rehabilitation and Reconstruction Program as well as exceptions to the policies and procedures to address situations not considered during the program design phase. The exceptions policies and procedures will consider changes to the maximum award amounts for applicants who demonstrate undue hardship as well as other exceptional situations. Demonstrable hardship may include but is not limited to: prolonged job loss, substantial reduction of household income, death of a family member on whom the surviving household was financially dependent, illness, unexpected and extraordinary medical bills, disability, etc. DCA ~~has will further~~ defined d "demonstrable hardship" and the exception policies in program policies and procedures.

~~6N6 6P6~~: Stormwater Infrastructure Needs

The state will work with the subrecipients to identify the stormwater infrastructure needs. ~~Stormwater improvements will be made as a result of a housing need within flood impacted areas.~~

~~6N7 6P7~~: Leveraging of Funds

DCA is seeking to leverage CDBG-DR funds on projects utilizing Low Income Housing Tax Credits (LIHTC). Although a tax credit allocation is not considered federal financial assistance under the Uniform Relocation Act and Section 104(d) of the Community Redevelopment Act of 1974, DCA requires that Owners of projects that receive a Tax Credit Allocation make every effort to minimize displacement of existing tenants."

DCA will assist subrecipients with HMGP match. With the CDBG-DR HMGP, a portion of the project will be funded with local dollars, a portion with state dollars, and CDBG-DR dollars. If HMGP funds are used in a project where acquisition, rehabilitation or demolition will occur the project will be subject to the standard URA regulations.

DCA will encourage subrecipients of infrastructure funds to provide leverage.

~~No other federal funds are expected to be used on the projects.~~

6N8 6P8: Citizenship

Per O.C.G.A 50-36-1, one person on the application with an ownership interest in part or in whole on the property must be able to demonstrate lawful presence in the United States.

6N9 6P9: Additional Resources

CDBG-DR funds are a last resort-funding source. The state has worked with HUD, FEMA, SBA, other federal agencies and state agencies to identify and catalog available sources of assistance for recovery from 2017 Presidentially Declared Disasters. The Georgia Department of Community Affairs will ensure that CDBG-DR funds are only used to address funding needs not satisfied by other funding sources, many of which are already providing disaster relief, including, but not limited to:

Table 41: Other Funding Sources	
FEMA Individual Assistance grants	Natural Resources Conservation Service Emergency Watershed
FEMA Hazard Mitigation Grant Program	Water Conservation District funds
SBA Disaster Loans	USDA Farm Service Agency's Emergency Forest Restoration Program
National Flood Insurance Program	Drinking Water and Water Pollution Control funds, and
Private insurance	Private foundations

7. Program Administration

7A: Citizen Participation – Outreach Efforts

In anticipation of a CDBG-DR allocation, DCA initially met with key staff and elected officials of local governments, chambers of commerce, development authorities, emergency management agencies of the most impacted communities first. The purpose of the meetings were to inform the communities of the CDBG-DR program and to discuss the impact of the disasters and further assess unmet need. The dates and communities participating in the meetings can be seen in the table below.

Table 42: First Round of Meetings	
Dougherty County	June 18, 2018
City of Albany	June 18, 2018
Camden County and City of Kingsland	June 21, 2018
Glynn County and City of Brunswick	June 21, 2018

DCA staff presented at the Georgia Municipal Association’s Annual Convention. This informational meeting was held with local elected officials from the four affected GMA regions on June 22 - 24. Subsequent meetings were held with the following counties on the following dates:

Table 43: Second Round of Meetings	
Liberty County and McIntosh County	July 9, 2018
Charlton County and the Cities of Folkston and Homeland	July 10, 2018
Crisp County, Turner County, Wilcox County, and Worth County	July 28, 2018
Berrien County, Coffee County, Cook County, and Thomas County	July 29, 2018
Chatham County	August 9, 2018

At the meetings listed in the table above, the local governments listed above indicated they addressed many of their unmet needs. The communities’ greatest remaining needs related to mitigation and resiliency.

DCA has also participated in several conference calls with the Most Impacted and Distressed areas in order to determine the needs in their communities.

7B: Public Notice and Comment Period of Draft Action Plan

The Georgia Department of Community Affairs encourages involvement from citizens in all aspects of the CDBG-DR Program. To this end, DCA seeks to ensure citizens and interested members of the public have an opportunity to review and comment on the draft Action Plan. The draft Action Plan will be posted on DCA’s website for a 30-day public review period beginning on November 19, 2018. A summary of all comments received and responses will be included in the appendices of the final Action Plan submitted to HUD for approval. The final Action Plan, approved by HUD, will be posted on DCA’s website.

7C: Amendments to the Action Plan

As additional information becomes available and programs evolve through the grant administration process, amendments to this plan are expected. Prior to adopting any substantial amendment to this Action Plan, DCA will publish the proposed amendment on the CDBG-DR website and will afford citizens,

affected local governments, and other interested parties a reasonable opportunity to examine the plan or amendment's contents and make comments. Substantial amendments include additions or deletion of any allowable activity described in the approved application; an allocation or re-allocation of more than \$1 million; or a change in planned beneficiaries.

Final Substantial Amendments approved by HUD will be posted to the Disaster Recovery website.

For other non-substantial amendments, the State shall notify HUD, but public comment is not required. Every amendment, substantial or not, shall be posted on the CDBG-DR website, not replacing, but in addition to all previous versions of the plan.

7D: Performance Reporting

In accordance with HUD requirements, DCA will submit a Quarterly Performance Report (QPR) through the HUD Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Program QPR's will be posted to DCA's website on a quarterly basis until all funds have been expended and all expenditures have been reported.

7E: Limited English Proficiency

DCA is committed to providing all citizens with equal access to information about the recovery program, including persons with disabilities and limited English proficiency. DCA follows HUD's regulation, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development—Effectuation of Title VI of the Civil Rights Act of 1964," which requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons.

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Where a significant number of non-English speaking residents can be reasonably expected to participate in public hearings or open comment periods, materials to be handed out will be translated into the appropriate language, citizen comments in a language other than English will be translated, and translators will be present.

~~Update: March 2019 – DCA will translate all Action Plans and amendments **the plan** into Spanish. **as soon as possible and ensure that any future amendments are translated into Spanish.**~~

7F: Applicants

~~For the Homeowner Rehabilitation and Reconstruction Program, application intake will be performed by **case managers the subrecipients. Subrecipients** **The case managers** will be required to keep applicants informed on their application status and to be responsive to inquiries.~~

~~Local government applicants for the Infrastructure Program, and HMGP Match may contact DCA to inquire about application status and timelines.~~

~~Applicants for the Buyout and Acquisition Program should contact the local government to inquire about application status. The applicant may also contact DCA directly.~~

7G: Citizen Complaint Procedures

Citizens may file a written complaint or appeals through the Disaster Recovery email at CDBG-DR@dca.ga.gov or submit by mail to the following address:

Georgia Department of Community Affairs
Attention: CDBG-DR
60 Executive Park South, NE.
Atlanta, GA 30329

DCA will make every effort to provide a timely written response within 15 working days of the receipt of complaint, where practicable.

7H: Program Income

If program income is generated by CDBG-DR programs, the State of Georgia will follow guidance provided in section 17 (Program income alternative requirement) in 81 FR 39702 (2016). Per that guidance, income received prior to the grant closeout will be utilized as additional CDBG-DR funds in the same manner as other CDBG-DR funds referenced. Any income received after the grant closeout, will be transferred to DCA's annual CDBG award.

7I: Pre-agreement Activities

The provisions of 24 CFR 570.489(b) and 570.200 (h) permits a state to reimburse itself for otherwise allowable costs incurred by itself or its recipients sub grantees or sub recipients on or after the incident of the covered disaster. The provisions at 24 CFR 570.200(h) and 570.489(b) apply to grantees reimbursing costs incurred by itself or its recipients or subrecipients prior to the execution of a grant agreement with HUD. This includes but is not limited to activities supporting program development, action plan development and stakeholder involvement support and other qualifying eligible costs incurred in response to an eligible disaster covered under Public Law 114-254.

DCA incurred pre-award costs and will seek reimbursement for these costs that are reasonable and allowable under this regulation. These include the cost for salary, fringe benefits, and direct operating costs for each employee based on their individual percentage of time spent on the planning of the CDBG-DR program.

7J: Anti-displacement

The State of Georgia plans to minimize displacement of persons or entities and assist persons or entities displaced as a result of implementing a project with CDBG-DR funds. The state will ensure that the assistance and protections afforded to persons or entities under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and Section 104(d) of the Housing and Community Development Act of 1974 are available. The URA provides that a displaced person is eligible to receive a rental assistance payment that covers a period of 42 months. The State accepts the HUD waiver of the Section 104(d) requirements which assures uniform and equitable treatment by setting the URA and its implementing regulations as the sole standard for relocation assistance under FR-5938-N-01.

8. Pre-award Implementation Plan

Background

In 2017, it seemed that the State of Georgia could not catch a break from severe weather. Dual catastrophic weather events harassed southern Georgia with destructive rain, wind, and cyclonic activity. On January 21st and 22nd, forty-one tornados touched down across the state of Georgia as part of a weather event that spawned the third-most tornados over a three day event in recorded US history. Twenty-seven tornados struck on January 21st alone, but the most dreadful effects were witnessed in Berrien, Brooks, Cook, and Thomas Counties on January 22nd. In these counties, fourteen people perished in the storms, and, less importantly, millions of dollars of property damage was reported during the recovery. Disaster declarations were made and are now known as disasters 4294 and 4297.

September brought another rash of severe weather to South Georgia. Hurricane Irma made landfall in Florida on September 10th. Over the next two days, Irma worked its way up the Florida coast and into Georgia. Once stationed over southern Georgia, Irma caused levels of damage and devastation not seen in this part of the state since 1994. A storm surge of more than four feet inundated the coast, and widespread flooding and power outages became the norm, not exceptions. In addition, fallen trees and windswept trash littered the area causing damages to homes, buildings, and other infrastructure. The widespread nature of the damage resulted in millions of dollars in cleanup costs alone. The flooding events related to Hurricane Irma are referred to as Disaster 4338.

Overview of Tornados—

The January tornados may not have been the more expensive of the two disasters in terms of dollars and cents, but on a human scale, few natural disasters in Georgia's history compare. The most concentrated damage was in the City of Adel, where one tornado hit the Sunshine Acres Mobile Home Park. This single neighborhood alone experienced the deaths of seven residents, ranging from 19 to 62 years of age. A report from the Atlanta Journal Constitution six months after the storms noted that, while residents and volunteers have worked "daily" since the storm on repairs to their properties, work still remained to be done. Additional damage from the tornados was observed in Albany, about 50 miles northwest of Adel. An EF3 tornado there killed five people, and the Albany Herald reported in a story on the one-year anniversary of the storm that "more than \$1 billion in local damages" resulted from the storm. Homes and businesses existed on a Friday, but by the time Monday came they were no more. Residents noted that it was the worst tornado to hit Albany in almost 80 years, since a February tornado in 1940.

Overview of Hurricane Irma

While Hurricane Irma did not make a direct landfall on Georgia's coast, one could barely take solace in this fact based on the damage witnessed in the aftermath of the storm. Georgia's barrier islands, called the Golden Isles, saw massive amounts of erosion. Jekyll Island's famed "Driftwood Beach," so called because of the beautiful collection of driftwood that collects each day and has inspired artists and poets alike for generations, saw all of the loose driftwood washed out to sea and many of the smaller trees that grew up to the beach obliterated. The scenic trees of Savannah and Saint Simons Island may be beautiful

southern backdrops, but after their rain-soaked roots were pressured for hours by high winds, they became living nightmares for both residents and debris removal crews when their limbs and trunks littered the ground.

The short-term tasks of cleanup and the long-term damage to landscape aside, many communities experienced impacts from Irma that were not as easily foreseeable. The Georgia coast is as known for its mosquitos as it is for its beaches, and a number of communities were forced to conduct additional spraying rounds in order to keep that pestilent population under control. Under normal conditions, places like Glynn County are able to quickly and consistently keep standing water environments at a minimum, but Irma changed the equation with her large rainfall totals and the prioritization of other recovery activities over these regular patrols. This placed many communities in a surprisingly poor position to handle cleanup. They were forced to ramp-up operations in quick succession in order to meet FEMA's reimbursement deadlines. While some were able to do this effectively, many were unable to conduct all of the recovery operations needed in the few months immediately following the disaster.

Purpose

All of the communities mentioned above experienced loss of life and major property damage; these places and their struggles were featured on local, state, and national news articles in the aftermath of the storms. The death and destruction, though, were not all that constituted the damage from the storms. Thousands of private citizens and many local governments felt the impact of the damaging winds, wind-tossed debris, flooding, and downed trees and power lines. These smaller, underreported stories are the ones that require the attention of the CDBG-Disaster Relief funding. After the storms were over, the national newspapers left, and the cleanup began, locals were unable to apply for and receive the federal assistance that make the difference between barely getting by and truly recovering. Millions of dollars in damage were reported through the numerous FEMA funding announcements after the storms, but not everyone was in a position to submit the applications and required documentation to benefit from these opportunities. Many individuals were already back working, and too busy trying to make a living to deal with the federal requirements at the time. In fact, it took months for many people to truly understand the nature of their recovery needs. It was not until a washed-out drain or a weakened structure failed that these needs were fully realized.

Local governments also dealt with these same issues. Georgia, especially South Georgia, has a large number of local governments with populations under 1,000. Many of these cities are only staffed by part-time employees; the weeks and months following the storms were full of clearing roads, helping elderly citizens with their debris cleanup, flushing water lines, repairing lift stations, issuing boil-water advisories, patching potholes, shoring-up storm drains, and a myriad of other tasks that cities and counties with more robust budgets and staffs would be able to do in a matter of days. The cities with larger staffs and budgets experienced outsized problems and costs to match. Chatham and Glynn Counties, home to the cities of Savannah and Brunswick, respectively, both saw the full impacts of the four feet of storm surge. Roads were washed out, homes were flooded and destroyed, and commercial areas damaged, some buildings beyond repair.

In accordance with Public Law 115-123 Guide for Review of Financial Management of CDBG-DR Grantees, each grantee is required to submit an Implementation Plan to describe the grantee's capacity to carry out the recovery, including the operational and program management functions relative to CDBG-DR funding. Any capacity gaps must be identified and filled based on the plan and timeline outlined by the grantee. This document has been prepared in compliance with these requirements and constitutes the Georgia Department of Community Affairs Risk Analysis & Implementation Plan. The plan seeks to establish how the Georgia Department of Community Affairs (DCA) will effectively and responsibly manage grant funds in compliance with the financial requirements, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. It will demonstrate that DCA has all necessary systems, guidance, and policies and procedures to uphold its duty in the administration of these funds. DCA will continue to develop and refine these policies throughout the CDBG-DR grant lifecycle. Furthermore, this plan will demonstrate that DCA has the capacity to deliver benefits to affected citizens in a timely and compliant manner.

Risk Analysis and Documentation

According to Public Law 115-123 Guide for Review of Financial Management of CDBG-DR Grantees, each grantee must submit Risk Analysis Documentation to demonstrate that it has in place proficient controls, procedures, and management capacity. This is inclusive of the grantee's ability to prevent duplication of benefits as defined by Section 312 of the Stafford Act as well as demonstrate the grantee can effectively manage the funds, ensure timely expenditure of funds, maintain a comprehensive website regarding all disaster recovery activities assisted with these funds, and ensure timely communication of application status to applicants for disaster recovery assistance. Finally, the grantee must demonstrate that it has adequate policies and procedures to detect and prevent fraud, waste and abuse.

Financial Controls & Procurement Processes

As a recipient of federal funds, DCA is subject to the Single Audit Act of 1984, as amended in 1996. The Single Audit Act standardizes requirements for auditing federal programs, and requires review of all federal programs by an independent Certified Public Accountant (CPA) for compliance with program requirements and proper expenditure of funds.

DCA is included in the State's fund level and entity wide financial statements as a part of the Comprehensive Annual Financial Report (CAFR) of Georgia. Additionally, DCA is also included in the Single Audit report issued by the Department of Audits. The audit can be viewed at the following link, https://www.audits.ga.gov/SGD/single_audit.html. The Single Audit states the DCA has no findings, material weaknesses, significant deficiencies, or questioned costs.

In collaboration with the Finance Department, the P.L. 115-123 Financial Management and Grant Compliance Certification has been completed. This certification is provided along with DCA's latest single audit, a copy of the DCA Grant Policy Financial Standards, as well as DCA's Procurement Procedure Policy Manual. DCA affirms that it has the requisite financial controls in place to account for and properly manage the CDBG-DR funding in a manner that is consistent with all federal accounting requirements.

~~Procedures to Prevent Duplication of Benefits~~

~~Federal law prohibits any person, business concern, or other entity from receiving Federal financial assistance for any part of a loss as to which he or she has already received financial assistance through any other program, insurance or funding source. Georgia DCA has policies and procedures in place to confirm that recipients of funds under its CDBG Disaster Recovery award do not receive a duplicative benefit. In accordance with the Robert T. Stafford Act, as amended, Georgia DCA will take actions necessary to conduct comprehensive analyses of assistance provided to disaster recovery subrecipients in order to prevent Duplication of Benefits (DOB) from occurring.~~

~~The Georgia DCA Disaster Recovery program will require a DOB analysis for each applicant to consider other disaster recovery funding sources when processing applications for assistance. Duplication of benefits will be calculated by (1) Determining each applicant's remaining recovery need; and then (2) Reducing the remaining recovery need by previously received funding for housing recovery, if any (less amounts expended on Allowable Activities). This activity will be monitored for accuracy and completeness by the Georgia Department of Community Affairs.~~

~~Common disaster assistance sources include but are not limited to:~~

- ~~• Federal Emergency Management Agency (FEMA)~~
- ~~• Small Business Administration (SBA)~~
- ~~• National Flood Insurance Program (NFIP)~~
- ~~• Private Insurance~~
- ~~• Private and nonprofit disaster assistance~~

~~The State will consider assistance amounts received/approved from alternate sources such as FEMA, insurance coverage, SBA and/or philanthropic organizations used to make repairs due to the declared disaster damage. Subgrantees will be responsible for obtaining documentation from applicants to determine if they received insurance benefits or other resources and how those funds were used, to ensure there is no duplication of benefit. The State will closely monitor any subgrantee, vendor, or subrecipient DOB verification processes. The State has data sharing agreements with FEMA and SBA to ensure the most recent assistance data is used in confirming other Federal assistance. In addition, DCA will secure data from the National Flood Insurance Program (NFIP). This will be used to determine if applicants seeking disaster recovery funding assistance have received other federal funding for the same purpose.~~

~~Duplication of benefit for housing assistance will only consider other sources of funding pertaining to structural damage caused by the 2017 Presidentially Declared Disasters. Assistance for contents and personal items will not be considered duplication.~~

~~The DCA CDBG-DR duplication of benefits review process currently includes forms the subgrantee will use to determine the amount of any duplicative assistance. Applicants requesting CDBG funds for disaster~~

recovery assistance may be required to submit the following forms for all proposed activities prior to approval:

- 1.—FEMA Declaration and Release Authorization Form (Attachment DOB-A)
- 2.—Georgia Eligibility Release Form (Attachment DOB-B)
- 3.—Georgia Duplication of Benefits Calculation Form (Attachment DOB-C)
- 4.—Duplication of Benefits Exception Acknowledgement Form, if applicable (Attachment DOB-D)
- 5.—Georgia Insurance Affidavit (Attachment DOB-E)

Additionally, DCA will have a subrogation clause in each sub-recipient agreement. These agreements will be signed at the time of application, prior to receiving assistance. Per the subrogation clause, any funds found to be a Duplication of Benefits must be returned to DCA, ineligible, unallowable, unreasonable, or non-compensable, no matter the cause. Under this clause, should a subrecipient or individual receive CDBG-DR funding to support an activity and subsequently receive outside funding that would render the CDBG-DR funds a Duplication of Benefits, the duplicative CDBG-DR funds must be returned to DCA's Community Finance Division. This subrogation clause will be included in any beneficiary agreement.

If a duplicative benefit is received after the disaster recovery award is provided, the applicant must subrogate any additional funds received for the same purpose as the award to the State. DCA and/or the subgrantee will be required to attempt to recapture any amount of duplicative benefits provided. DCA may withhold payment on any project, or outright suspend activities, if a duplication of benefits issue is not resolved in a timely manner. Further, DCA will not complete contract close-out processing until identified duplication of benefits issues are resolved.

Timely Expenditure of the Funds

Per Federal Register Notice 83 FR 40314, CDBG-DR funds must be expended within a six (6) year period beginning on the date the grant agreement is signed by HUD. However, we understand that HUD will periodically review DCA's progress in drawing down funding from its grant award. DCA will review in-house expenditures and sub-recipient's expenditures to ensure that funds are spent on eligible costs and in a timely manner. Project funds and schedules will be monitored by DCA's Community Finance Division, CDBG-DR Regional Representatives and DCA's State CDBG Compliance Team.

DCA administers Georgia's State CDBG program, therefore staff members have experience with monitoring the expenditure rate of the State CDBG program. DCA's CDBG Policies & Procedures are provided as an appendix to this document. With DCA's annual allocation of CDBG funds, DCA's Community Finance Division maintains detailed reports monitoring the expenditure of funds and project schedules. Considering that the amount of the CDBG-DR grant to DCA is larger than the usual annual allocation, DCA will adapt and enhance its current processes by establishing standard tracking mechanisms, processes and templates to ensure consistency and continuity among program activities. DCA will also maximize its use of technology to support and augment any standard processes instituted to ensure timely expenditure of funds.

~~DCA will hold all subgrantees and/or contractors accountable through the establishment of benchmarks and other critical milestones. Subgrantees and/or contractors will be required to provide detailed reports concerning expenditure of funds and project progress to DCA upon its request. At a minimum, DCA requires each subrecipient complete a quarterly report detailing project progress, documenting contracts, and financial reporting.~~

~~DCA will submit a projection of expenditures and an Outcomes Plan to HUD with the initial Action Plan, in compliance with Federal Register Notice 83 FR 40314. Revised projections will be sent to HUD when program changes impact projected outcomes, funding levels, and recovery timelines. We understand HUD will use this information to track DCA's proposed versus actual performance. It will serve as a tool to measure overall performance as well as project specific performance. DCA will aggressively monitor subgrantees and/or contractors, using benchmarks, milestones and projections as a means to minimize delays in expending funds for eligible project activities.~~

~~Detect and Prevent Fraud Waste and Abuse~~

~~The State of Georgia is dedicated to the prevention of fraud, waste and abuse. All suspected cases of fraud will be taken seriously and complaints will be reported to the Georgia Office of the Inspector General for further investigation.~~

~~DCA will monitor the application process, ensuring that all required documentation and information is included in the application packet. Specifically, CDBG-DR staff will be trained to address the issue of "Duplication of Benefits" will evaluate the information provided to determine what, if any, duplication may occur. Additionally, those staff members will contact insurance companies, FEMA/Emergency Management staff, NFIP, etc. to verify the information provided by the applicant. We will foster a relationship with the American Red Cross and/or Georgia Voluntary Organizations Active in Disaster (VOAD) to determine and/or verify any efforts performed to assist the applicant.~~

~~DCA's State CDBG Program has a monitoring process which includes several layers of approvals before funds are expended, in essence, allowing us to "monitor" the use of funds on an individual basis. This process includes multi-level review of the use of funds. These reviews occur throughout the process, from the front-line contractor(s) through the subgrantee to the Community Finance Division. There is an evaluation made to determine that the use of funds is legitimate and in keeping with the requirements of the governing policies, procedures, rules, regulations, ordinances and laws. If any other determination is reached, the use of funds is delayed until further information is obtained. If the additional information does not result in a positive determination, the use of funds for that purpose will not be allowed.~~

~~DCA's Disaster Recovery monitoring program also includes desk monitoring and onsite monitoring with priority and frequency based on the results of a risk assessment. The risk assessment provides the basis for developing individual monitoring strategies and documents the decisions and recommendations regarding where to apply staff and travel resources for monitoring, training and/or technical assistance. Each subrecipient application will be evaluated and monitored throughout the duration of the project to ensure compliance with all CDBG-DR regulations.~~

~~DCA is included in the State's fund level and entity wide financial statements as a part of the Comprehensive Annual Financial Report (CAFR) of Georgia. Additionally, DCA is included in the Single Audit report issued by the Department of Audits.~~

~~In an effort to prevent fraud, waste, and abuse, DCA is currently seeking funds to hire an internal programmatic and financial auditor for the agency as a whole. This auditor will conduct programmatic and financial audits on the DR program and will perform these assessments on an ongoing basis.~~

~~DCA also requires subgrantees undergo annual independent audits of their financial operations, including compliance with Federal and State law and regulations. CDBG audit requirements are located in Chapter 3 Section 2 of the "State of Georgia Community Development Block Grant Recipients Manual FY2018."~~

~~Procedures to Maintain a Comprehensive Website~~

~~The Georgia Department of Community Affairs has a public website providing access to information and programs administered by the State. DCA has created a separate and distinct webpage on its website entitled "Disaster Recovery Programs" that includes all information on disaster recovery activities assisted with CDBG DR funds due to the 2017 natural disasters. The creation and maintenance of the public website is one component of HUD's certification that DCA has proficient financial controls and procurement processes as provided for in the Register. An image of the website can be seen in the figure on the following page.~~



LOCAL GOVERNMENT ASSISTANCE

Research & surveys, planning, maps, volunteerism, building codes

COMMUNITY & ECONOMIC DEVELOPMENT

Financial assistance opportunities for communities

SAFE & AFFORDABLE HOUSING

Helping communities meet housing needs and connecting people with housing assistance

Community & Economic Development | Funding Programs | Community Development Block Grant Disaster Recovery Program (CDBG-DR)

Community Development Block Grant Disaster Recovery Program (CDBG-DR)

Basic Info

During 2017, severe weather events caused extensive damage in many parts of our state, resulting in three Presidential declarations of a major disaster – two due to Southwest Georgia tornadoes and one in the wake of Hurricane Irma. Earlier this year, the federal government awarded Georgia \$64,904,000 in disaster recovery assistance to address “unmet needs” and “mitigation” in the areas damaged by one of these major disasters. The funding has been made available through the Department of Housing and Urban Development’s (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) program, which focuses on covering “...necessary expenses for activities...related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas.”



CONTACT

CDBG-DR@dca.ga.gov

This funding is now available to assist communities, some of which were completely devastated and remain uninhabitable a year after the fact. Counties that received public and individual assistance are eligible to receive these funds.

Funds will be prioritized for use in the most impacted and distressed areas, to facilitate long-term recovery through the restoration of infrastructure and housing, mitigation to protect from predictable future damage, and economic revitalization. DCA is actively working with HUD on program details, and will be coordinating directly with local governments in eligible disaster areas.

Eligible counties: Berrien, Camden, Chatham, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, Worth

Documents


[Applications](#)

~~The Disaster Recovery Program webpage will continue to grow and change as information becomes available. The website will include links to action plans, action plan amendments, citizen participation requirements, the quarterly reporting system, and activity/program information for activities described in the action plan, including details of all contracts and ongoing procurement policies, eligibility, program design, and other pertinent information.~~

~~The following details the specifics related to plans, reports, etc. as they will be posted to the website:~~

~~Action Plan and Amendments~~

~~All substantial Action Plan amendments will be posted for no less than 30 calendar days to solicit public comment before being submitted to HUD. Non-substantial amendments will not be posted for public comment. All final approved amendments will be posted to a permanent section on the webpage designated for action plans and amendments.~~

~~Performance Reports~~

~~Within three days of submission to HUD, each DRGR Quarterly Progress Report (QPR) will be posted to a permanent section on the webpage designated for reporting.~~

~~Citizen Participation Plan~~

~~The Citizen Participation Plan will remain on the website. Although not mandatory, DCA will receive input from local communities to determine the most pertinent unmet needs of the subgrantees. Contact information for DCA will be posted to the webpage for citizens and program participants with questions or complaints. Additionally, interested citizens may submit questions and comments to the CDBG-DR@dca.ga.gov email address on the webpage, which is monitored by disaster recovery analysts for review and action.~~

~~Program Activities Information~~

~~Program announcements and details of activities will be posted to the website on an ongoing basis. Program guidebooks and manuals will be posted to the website in English and made available in other languages for limited English proficiency audiences, as applicable.~~

~~Content Management~~

~~Content for the website will be created and updated by the Disaster Recovery Program Manager and provided for review and approval to the Community Finance Division Director. Upon approval by the Community Finance Division Director, the content will be uploaded to the webpage within 48 hours. The Disaster Recovery Program Coordinator will perform monthly tests of the Disaster Recovery Programs webpage to ensure all links are active and documents are current.~~

Capacity Assessment

Through the delivery of the annual Community Development Block Grant (CDBG) program, DCA staff members have developed experience in delivering programs in compliance with many of the regulatory requirements mandated under Register Notice 83 FR 40314 for CDBG-DR funding. However, there are some additional regulations and/or policies that DCA will be required to implement as a part of the CDBG-DR program. The Community Development Block Grant Program (CDBG) provides funding to assist a wide-range of eligible activities, including housing improvement projects, public facilities such as water and sewer lines, buildings such as local health centers or head start centers, and economic development projects. All projects substantially benefit low and moderate-income persons. The total funding level for FY 2018 was approximately \$41 million.

DCA has GIS staff in place to assist the CDBG-DR Program Manager with the Action Plan and Unmet Needs Assessment. Although DCA has the general programmatic and financial infrastructure in place to serve CDBG subrecipients, it will need additional support to efficiently manage the CDBG-DR allocation of \$37,943,000 for unmet housing needs. There is an additional need for supplemental staffing and efforts are currently underway to meet this need. Due to the lack of available funds, DCA will leverage its current CDBG staff and hiring additional staff members will occur in a staged manner to ramp up operations as needed, rather than hiring in mass prior to the signing of the grant agreement. By creating a staged hiring strategy, DCA can most effectively conserve and use its limited resources.

~~In early October 2018, Michael, a category 4 hurricane, plowed through many parts of Georgia. The losses are preliminary, but are extremely devastating. Anticipating future federal funds, DCA hopes to establish a successful and efficient Disaster Recovery Program and lay the groundwork for future disaster allocations. Additionally, the future allocations may help supplement the costs of growing the program and adding staff members and subject matter experts.~~

DCA does foresee the possibility of contracting through a sub-grantee and/or procuring the necessary staffing and expertise to augment the DCA's current staff. DCA is exploring the option to leverage our interagency relationships to assist with carrying out the activities under the grant, such as working with the State Historic Preservation Office. These agencies and subcontractors can provide technical assistance to DCA staff, assist with developing standard operating procedures as well as program policies and procedures, provide environmental review, estimating and inspection services, assist with general program management and provide other resources as necessary to fulfill DCA's obligations under the grant. The priorities identified during the Action Planning process will assist in DCA's assessment as to the resources that may be needed to support program management functions. DCA's consultant(s) may provide the following services:

- ~~Environmental Review~~
- ~~Inspection and Cost Estimating~~
- ~~Title & Appraisal Services~~
- ~~Intake Application Review including Duplication of Benefits~~
- ~~Case Managers~~
- ~~Uniform Relocation Act Assistance~~

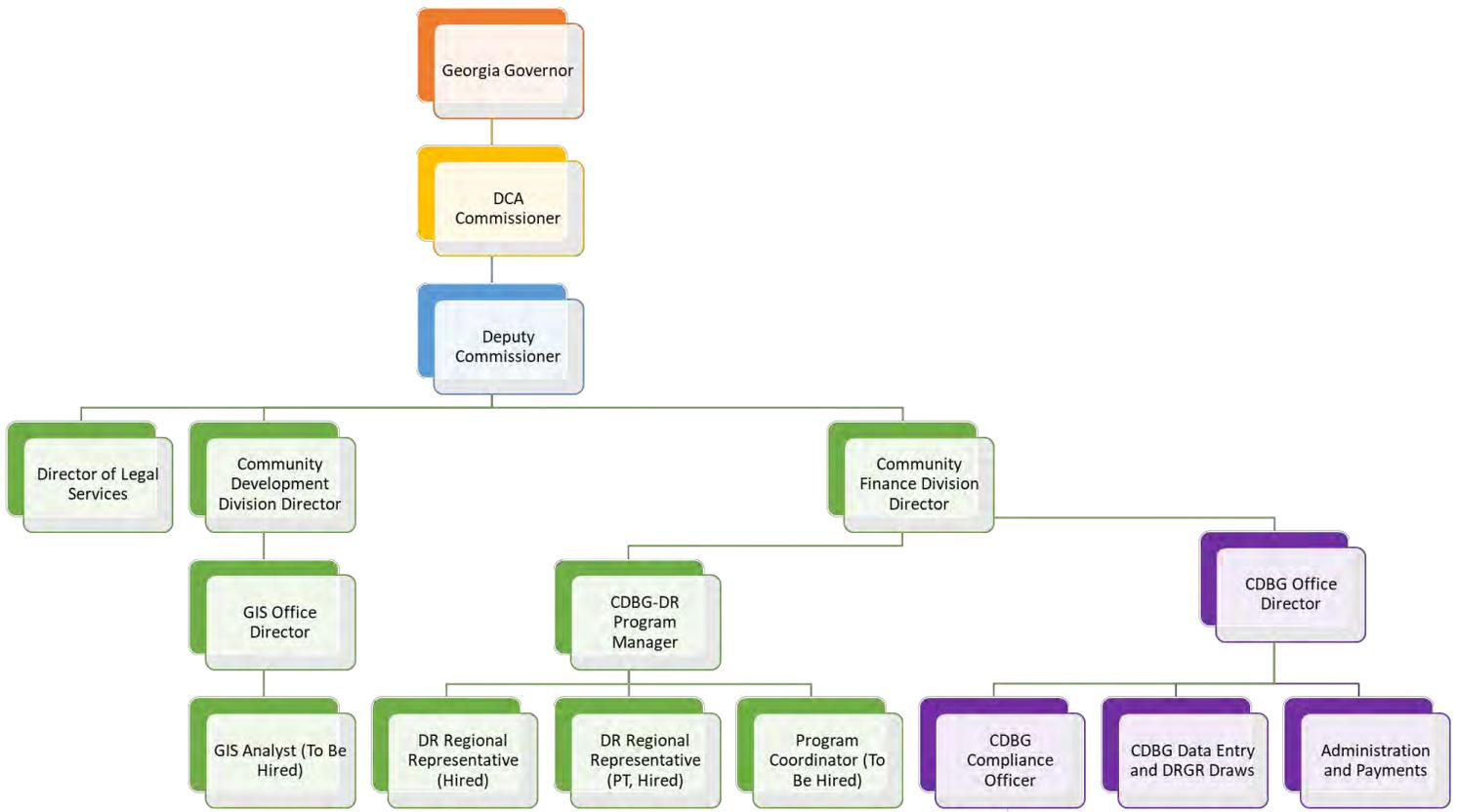
Staffing

As mentioned previously, DCA has existing staff resources, but will maximize the use of the resources available and bring on additional staff as needed and to the extent, funds are available. As DCA is developing its staffing model, it will consider all options and determine what the most reasonable staffing model looks like in relation to the program activities it will undertake.

Since program activities have not yet been determined, DCA's staffing model will be flexible to accommodate the needs associated with program activities. As the programs get underway, DCA will make the appropriate adjustments to accommodate the work load. The organizational chart in this section gives a visual of the various functions associated with the program activities undertaken with the CDBG-DR funds. Job descriptions are also included following the organizational chart.

Key staff members have prior experience with the HUD funded CDBG annual program. The position descriptions outlined below align with the functional areas identified in the organizational chart. The organization chart can be seen on the following page.

Georgia Department of Community Affairs Organizational Chart



Descriptions of the CDBG-DR positions are as follows:

~~CDBG-DR Program Manager – (In place)~~

~~The program manager will operate under the supervision of the Community Finance Division Director. The Disaster Recovery Program Manager will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.~~

~~The CDBG-DR Program Manger directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the Georgia Department of Community Affairs. The CDBG-DR Program Manager links all Federal, State and Local resources to deliver the most optimal disaster recovery objectives. The CDBG-DR Program Manager works with government entities, volunteer organizations and staff to analyze data and guide programs that will assist communities in disaster recovery and resilience. Also, the program manager is responsible for producing quarterly reports and keeping the state disaster recovery website up to date.~~

~~CDBG-DR Program Coordinator – (To be hired)~~

~~Under the supervision of the CDBG-DR Program Manager, the Disaster Recovery Programs Coordinator will coordinate, provide technical assistance and guidance to implement the federal recovery program within the Community Finance Division.~~

~~The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development which administers the State CDBG program. The position will be responsible for coordinating and/or supporting the State's application/request process from application development, roll-out of the program, administration and coordination of the program, and closeout of the program. The coordinator will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc. and make recommendations for changes in procedures and other activities to accomplish program objectives and timelines. The coordinator will also review project expenses and reimbursement requests to ensure that costs are accurate, necessary, and reasonable and in direct support of the proposed project activity. The coordinator will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the coordinator will conduct training on disaster assistance programs and other associated topics.~~

~~CDBG-DR Regional Representative – (1.5 Positions, In place)~~

~~The DR regional representatives report to the Community Development Block Grant Disaster Recovery Program Manager. The CDBG-DR Regional Representatives are responsible for monitoring and servicing complex Disaster Recovery related Community Development Programs within a designated region. The Regional Representative maintain an awareness of the status of potential and existing projects and provide advice and assistance to other Community Development and Finance Division Office of Field Services and/or Office of Community Development personnel. The representatives have duties related to oversight and compliance with CDBG-DR grants and provide technical assistance to program~~

administrators and local governments in the region. The representatives meet on-site with local officials or representative to monitor for CDBG-DR program compliance. The representatives have knowledge of CDBG and CDBG-DR guidelines and applicable federal regulations and confer with CDBG and CDBG-DR staff and units of local government on a regular basis to evaluate work progress and solve problems or develop solutions. The representatives create and deliver technical presentations associated with CDBG-DR compliance matters for grant applications and/or grant awards. The representative conduct site visits in order to verify grant application statements of need/target area conditions

Additional Support

CDBG Office Director – (In place)

Oversees program implementation, compliance, grants management services, and finance services for the Division. The Director manages all CDBG personnel.

CDBG Compliance Officer – (In place)

The Compliance Officer supervises, coordinates and reviews the work of the CDBG Compliance staff and field staff and reviews applicable laws, regulations and HUD monitoring guidance and develops forms, reports and procedures to correctly implement requirements. The Officer serves as the subject matter expert in the following areas: The Housing and Community Development Act of 1974, as amended, and implementing regulations, federal financial management regulations, national Environmental Policy Act of 1969 and implementing regulations, the National Historic Preservation Act of 1966 and implementing regulations, labor laws, e.g., the Davis Bacon Act, the Contract Work Hours and Safety Standards Act, and the Copeland “Anti-Kickback” Act, acquisition and relocation laws and regulations, e.g., The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, State of Georgia Procurement law – O.C.G.A. 36-91.

CDBG Data Entry and DRGR Draws – (In place)

DCA staff will be responsible for grant and financial management and will implement grant management HUD accounting and reporting requirements in the following areas: 1) financial management and fiscal controls, 2) program income, 3) internal controls; 4) cash management, and 5) single audit requirements. Staff will oversee review and maintenance of grant financial records, supervise the work of other grant/financial management and systems management staff (two positions at this time). The incumbent will also oversee the reconciliation of financial and accounting records involving grant recipient financial reporting, grant recipient draw requests, Grants Management System (GMS) records, and DCA accounting records. In addition, DCA staff will oversee and maintain the Funds databases in GMS to ensure that all funds granted to DCA by HUD are accounted for and produce any financial reports required by HUD. DCA staff will manage the mission-critical divisional Grants Management System (GMS) and maintain and develop online reporting system to collect CDBG quarterly reports, accomplishment reports, NSP project setup and completion reports, and CDBG-R data for ARRA 1512 reports.

CDBG Admin/ Payments – (In place)

Existing CDBG financial management staff will maintain financial records on the Grant Management System (GMS), provide support, review all locally executed grant award documents for accuracy and

completeness. The staff will also create drawdown files using completed award documents, prepare and provide batch sheets to DCA's Office of Accounting, and recommend approval of draws by ensuring all figures on the draw request form. The staff will recommend approval and draw funds from HUD using the IDIS and DRGR databases upon approval from the applicable Office Director or other designee. The staff will also serve as the final check on all draw information prior to entry into the GMS and HUD databases and apply program income/returned checks from various sources to draws and makes the correct program income entries into the HUD databases and the GMS system.

GIS and Research Analyst – (To be filled by the Office of Planning)

The analyst will collect and interpret geographic information provided by geodetic surveys, aerial photos and satellite data. The analyst will evaluate, measure and record geospatial data using geographic information systems software and related hardware and software specific to the area of assignment. The analyst will create or maintain GIS databases and cartographic products. The incumbent will perform geospatial analyses of moderate complexity and presents data in cartographic form. The analyst will monitor adherence to policies and procedures and locate and obtain existing geographic information databases.

DCA Office of Finance – (In-Place)

The office performs managerial and professional duties in accounting, budgeting and finance. The Chief Financial Officer directs and oversees all aspects of the Finance, Procurement and Accounting functions of the programs at the Department. This position is responsible for directing the development and establishment of policies and procedures as it pertains to finance and accounting.

Director of Legal Services – (In-Place)

The Director of Legal Services provides legal guidance to the CDBG-DR team on the development of disaster recovery plans, policies, and the implementation of activities.

Technical Assistance

DCA anticipates the level of Technical Assistance (TA) will be in high demand for this grant since DCA will be using subgrantees to administer this grant who lack experience with CDBG-DR. HUD provided technical assistance to DCA will be used to outline the specific requirements of the Federal Register Notice along with receiving guidance relative to best practices that should be considered by DCA as it undertakes activities under the CDBG-DR program. DCA staff will be provided with training necessary, by HUD provided technical assistance and HUD provided training, to ensure that activities funded under this Implementation Plan are correctly and efficiently administered. DCA staff members have attended HUD provided training through the 2016 CDBG-DR webinar series and have access to these resources, as well as the HUD CDBG-DR program management tools provided on the HUD Exchange website. Current CDBG-DR staff are also registered for the CDBG-DR Problem Solving Clinic scheduled for December 2018.

DCA plans to consult with HUD on an as-needed basis for general policy guidance or clarification of statutory requirements, though we do understand there are limited resources. Although DCA anticipates that the disaster recovery grant will be managed out of HUD's Washington, DC office, we will consult with the Atlanta HUD Field Office to seek solutions to issues.

~~Technical assistance will be provided to contractors and sub-recipients on a consistent basis to ensure they are up to date on the most current disaster recovery information and program requirements. This will be accomplished through training sessions, webinars, presentations or other communication tools.~~

~~The following list contains areas in which Technical Assistance may be necessary:-~~

- ~~• New construction~~
- ~~• New building codes and standards to promote resiliency and mitigation~~
- ~~• Green building checklist — energy star~~
- ~~• Contractor prequalification (possibly by State for sub-grantees)~~
- ~~• IT system of record~~
- ~~• Training for system management~~
- ~~• Understanding case management processes~~
- ~~• On-going capacity building and training~~
- ~~• Duplication of Benefits (DOB) training~~

~~Accountability~~

~~DCA shall serve as the lead agency responsible for the implementation of the CDBG-DR award. This implementation will be administered through the Community Finance Division. This department currently administers the State's CDBG Program. The CDBG-DR program manager will oversee the day-to-day activities of the CDBG-DR Activities.~~

~~The Georgia Department of Community Affairs is governed by a policy making board consisting of 14 members representing Congressional districts and five at-large members. The chairperson is Carolyn "Tippi" Cain Burch, the Vice Chair is George "Chip" Mitchell, and the Secretary is Audrey King. The Board meets quarterly for regularly scheduled meetings.~~

~~Certification of Accuracy of Risk Analysis Documentation~~

~~On behalf of the Georgia Department of Community Affairs, I certify that the information submitted within this Risk Analysis Documentation is true and accurate at the time of submission to HUD and complies with Federal Register Notice 83 FR 40314 and Public Law 115-123. This certification is limited to the content of the Risk Analysis Documentation.~~

Printed Name and Title Date

Signature

{Signed Certification of Accuracy of Risk Analysis Documentation submitted to HUD}

Appendices

Grantee Certifications

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.
- d. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.
- e. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. Each State receiving a direct award under this Notice certifies that it has consulted with affected local governments in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.
- h. The grantee certifies that it is complying with each of the following criteria:
 - (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 - (2) With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 - (3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons.
 - (4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for

purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

- i. The grantee certifies that it grant will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.
- j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:
 - (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
 - (2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- k. Each State receiving a direct award under this Notice certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a under Section VI and its Implementation Plan and Capacity Assessment and related submission to HUD referenced at A.1.b under Section VI.
- l. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or tribal government or delineated as a special flood hazard area (or 100-year floodplain) in FEMA’s most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local and tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.
- m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- n. The grantee certifies that it will comply with environmental requirements at 24 CFR Part 58.
- o. The grantee certifies that it will comply with applicable laws.

Christopher Nunn, Commissioner
Georgia Department of Community Affairs

Date

[Signed Certifications submitted to HUD]

Income Limits

2018 HUD Income Limits for IA Declared Counties								
Limits	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Berrien								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Camden								
Extremely Low	13,450	16,460	20,780	25,100	29,420	33,740	38,060	42,150
Very Low	22,350	25,550	28,750	31,900	34,500	37,050	39,600	42,150
Low	35,750	40,850	45,950	51,050	55,150	59,250	63,350	67,400
Charlton								
Extremely Low	12,140	16,460	20,780	25,100	29,420	32,150	34,350	36,600
Very Low	19,400	22,200	24,950	27,700	29,950	32,150	34,350	36,600
Low	31,050	35,450	39,900	44,300	47,850	51,400	54,950	58,500
Chatham								
Extremely Low	13,700	16,460	20,780	25,100	29,420	33,740	38,060	42,380
Very Low	22,850	26,100	29,350	32,600	35,250	37,850	40,450	43,050
Low	36,550	41,750	46,950	52,150	56,350	60,500	64,700	68,850
Coffee								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Cook								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Crisp								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650

Dougherty								
Extremely Low	12,140	16,460	20,780	25,100	28,500	30,600	32,700	34,800
Very Low	18,450	21,100	23,750	26,350	28,500	30,600	32,700	34,800
Low	29,550	33,750	37,950	42,150	45,550	48,900	52,300	55,650
Glynn								
Extremely Low	12,140	16,460	20,780	25,100	28,650	30,750	32,900	35,000
Very Low	18,550	21,200	23,850	26,500	28,650	30,750	32,900	35,000
Low	29,700	33,950	38,200	42,400	45,800	49,200	52,600	56,000
Liberty								
Extremely Low	12,140	16,460	20,780	24,950	26,950	28,950	30,950	32,950
Very Low	17,500	20,000	22,500	24,950	26,950	28,950	30,950	32,950
Low	27,950	31,950	35,950	39,900	43,100	46,300	49,500	52,700
McIntosh								
Extremely Low	12,140	16,460	20,780	25,100	28,650	30,750	32,900	35,000
Very Low	18,550	21,200	23,850	26,500	28,650	30,750	32,900	35,000
Low	29,700	33,950	38,200	42,400	45,800	49,200	52,600	56,000
Thomas								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Turner								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Wilcox								
Extremely Low	12,140	16,460	20,780	24,450	26,450	28,400	30,350	32,300
Very Low	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
Low	27,400	31,300	35,200	39,100	42,250	45,400	48,500	51,650
Worth								
Extremely Low	12,140	16,460	20,780	25,100	28,500	30,600	32,700	34,800
Very Low	18,450	21,100	23,750	26,350	28,500	30,600	32,700	34,800
Low	29,550	33,750	37,950	42,150	45,550	48,900	52,300	55,650

Public Comments

DCA received the following comments on the Draft Action Plan:

Comment – Tara Jennings, Chatham County, November 27, 2018

Please consider the following suggestions when reviewing and rewriting the CDBG-DR Action Plan.

Chatham County homeless data for inclusion on chart on page #31:

- **217 Unsheltered Homeless Persons**
- **247 Sheltered Homeless Persons**
- **464 Total Homeless Persons**
- **543 Total Emergency Shelter & Transitional Housing Beds**
- **Unknown # of Imminent Homeless**
- **11 Unsheltered Veterans**
- **32 Unsheltered Chronic Extrapolation**

Please include meeting with Chatham County leadership on August 9, 2018 on page 65

DCA incorporated all of the information received from Ms. Jennings into the Action Plan.

Comment – Ashby Worley, The Nature Conservancy Altama Coastal Office, November 28, 2018

Does the HMGP (\$3M) that is included in this report a separate type of mitigation assistance than what may be additionally coming from HUD (I recall \$26M mentioned in your last report). I think this is the case, but just wanted to confirm. Do you know when more guidance/info on that batch of funds will come out?

I don't have any major edits/comments on the report but am pleased to see the funding for HMGP and Buyout Programs. Those are two areas that TNC may be able to help communities in preservation or restoration of land, or help them identify floodprone regions/properties.

DCA responded to Mrs. Worley. In sum, the HMGP funds come from the un-met needs allocation. There is a separation allocation of \$26,961,000 for mitigation activities. Guidance on the use of the mitigation allocation has not yet been made available.

Comments were received from Julie Haigler on behalf of the Camden County and the City of Kingsland on December 3, 2018. DCA's responses were provided on December 19, 2018. Ms. Haigler's questions are highlighted in green and DCA's responses are listed below each question.

1. Can the language be changed in the buyout section on page 62. Instead of 100 or 500 year floodplain, can it be changed to say historically flood prone areas or prior to building codes or wetland regulations. This will allow the stream to return to natural flow and flood plain to natural storage capacity. We have applied to GEMA/FEMA's Hazard Mitigation Grant Program for two property acquisitions. We would like to purchase a few more homes on the same street, but these flood prone properties are not in a special hazard zone. We are afraid the current language makes these properties ineligible.

We have taken into consideration this request. The original statement in the Draft Action plan is listed below:

The buyout program will include the purchase of eligible storm impacted and substantially damaged properties inside the 100 or potentially 500-year floodplain in storm impacted areas.

The statement will now read:

The buyout program will include the purchase of eligible storm impacted and severely damaged properties located in a floodway or floodplain that is intended to reduce risk from future flooding.

2. Is transportation (multi-use path) an allowable expense. If we were to build low income housing, we would want to provide a transportation option for residents.

The first priority of CDBG-DR funds is providing decent, safe, and sanitary housing in the disaster impacted areas through the provision of activities designed to mitigate disaster damage that occurred as a result of past, as well as any future disasters. Allowable expenses under the proposed programs will be detailed in the program guidelines. These guidelines are currently being developed.

3. We are curious who provided the emergency shelter data on page 30. It may not be incorrect.

Information was obtained from DCA's Office of Homeless and Special Needs housing.

4. The City wants to send out a RFP for grant writing and administration services, so do they need to use the regulations listed in the regular round manual? (7 providers)

While the Disaster Recovery Program is similar to the CDBG program, there are various nuances that are specific to CDBG-DR. The CDBG-DR applicant manual will give specific guidance on procurement. The manual is currently being developed, but will be publicized on the following webpage when it is complete:

<https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-recovery>

5. Lastly, is it anticipated that the application will be due in early April?

The application deadline date is to-be-determined at this moment. The draft Action Plan will be submitted to HUD for review on December 19, 2018. HUD is allotted 45 - 60 days from the date of receipt to review the plan. If the event the action plan is not approved, HUD will notify DCA of the deficiencies and DCA must then resubmit the action plan within 45 days of the notification.

Comments received from Michael McCoy on behalf of Dougherty County on December 13, 2018. DCA's responses were provided on December 19, 2018. Mr. McCoy's questions are highlighted in green and DCA's responses are listed below each question.

Affordable Multifamily Rental Program

1. Is every rehab project under this program required to use LIHTC?

Developments under this program are not required to utilize Low-Income Housing Tax Credits (LIHTC). However, in an effort to have the greatest impact, achieve maximum leverage of and depending of readiness of the projects, LIHTC projects will be given priority.

2. For new construction, can the subgrantee designate ownership to another entity (such as a property management company)?

Generally, an owner will hire a qualified property management company to operate the property but not step into ownership. Transfers of ownership are allowed provided the new owner is determined to be qualified. If the ownership of a property changes, all of the affordability periods and compliance measures continue to apply to the new property.

The affordability period under the CDBG-DR Affordable Multifamily Rental Program is fifteen (15) years for the rehabilitation or reconstruction of multi-family rental projects with eight or more units, and a minimum affordability period of twenty (20) years for the new construction of multi-family rental units with five or more units. Tax Credits have an initial 15 year period with a required additional 15 year extended use period. Once the twenty year period for CDBG-DR funds has passed, there would be an additional 10 year period under the credits. The two requirements overlay onto the property.

3. Does this program allow the rehab of single-family detached dwellings?

The Affordable Multifamily Rental Program is designed for multi-family rental developments. However, there are options for "single-family style" detached rental development. The Homeowner Rehabilitation Program allows for rehabilitation for single-family detached dwellings.

a. What are the eligible activities for damaged modular or mobile homes?

The difference between modular and manufactured homes is often in the permanence. For instance modular homes are placed on a permanent foundation; whereas trailers, or manufactured homes are built on a steel chassis with wheels attached. This is so the trailer can be moved or towed. Due to repetitive loss because of natural disasters in this area, the state intends to increase resiliency by not replacing damaged modular or mobile homes with mobile homes.

Due to the way modular and mobile homes are constructed, when they reach a certain level of damage the cost to repair them can be excessive. Mobile home repair activities, if any, will be detailed within the program guidelines at a future date.

b. Is new stick built construction allowed when local ordinance allows development of such structures?

New stick-built homes are allowed, but are subject to program guidelines.

c. What options are available when lot size is not big enough for a new stick builds, are mobile home replacements allowed?

The purpose of this program is to facilitate the rehabilitation, reconstruction, and or/new construction of multi-family rental housing.

Mobile home replacements are not allowed. Due to repetitive loss because of natural disasters in this area, the state intends to increase resiliency by not replacing damaged modular or mobile homes with mobile homes. In addition, due to the way modular and mobile homes are constructed, when they reach a certain level of damage the cost to repair them can be excessive.

Homeowner Rehabilitation Program

1. Can the county verify disaster damage as part of its rehabilitation program with a program inspector since FEMA and/or SBA may have not inspected an applicant's home or indicated there were no damages due to the nature of how these agencies record damages despite the fact that the residence did receive damage?

Yes, provided there is sufficient documentation to demonstrate the damage was a direct result of DR 4294, 4297, and/or 4338. Per Page 61 of the Action Plan, the Homeowner Rehabilitation Program allows for an inspection by FEMA. SBA, and/or a privately contracted inspector.

a. Low-moderate income residents may not have pursued privately contracting to get a cost estimate since they couldn't afford to pay for rehab costs. Can evidence such as photographs of an applicant's house from the time of the storm indicating damage be acceptable evidence of damage from the storm?

Per Page 61 of the Action Plan, the Homeowner Rehabilitation Program allows for an inspection by FEMA. SBA, and/or a privately contracted inspector.

Generally, photographs are an acceptable method of documenting damage. However, specific acceptable methods of documenting damage will be listed within the program manual.

2. Must the home owners have occupied the property at the time of the storm?

To utilize CDBG-DR funding to rehabilitate or reconstruct disaster-damaged homes the home must have been owner-occupied at the time of the storm.

a. Will the state permit exceptions to the potential requirement regarding owning the property at the time of the storm event for special circumstances such as the previous owner passing away and an income qualified family member having obtained ownership of the property?

To utilize CDBG-DR funding to rehabilitate or reconstruct disaster-damaged homes the home must have been owner-occupied at the time of the storm. In order to meet the LMI National Objective the beneficiary must be LMI.

3. Must applicants meet one of the prioritization criteria to be eligible or is this just indicating that households meeting one of the prioritization criteria will be given higher priority in a local rehab program?

The prioritization criteria serves as a basis for giving higher priority in the local rehabilitation programs. The prioritization criteria is not the eligibility requirements.

a. Would households qualified as earning moderate income, <80% AMI, be qualified for the rehab program just not prioritized since they still meet the LMI national objective?

Yes. See above answer to question 3.

b. Does this program allow for manufactured housing replacement?

No. Due to repetitive loss because of natural disasters in this area, the state intends to increase resiliency by not replacing damaged modular or mobile homes with mobile homes. In addition, due to the way modular and mobile homes are constructed, when they reach a certain level of damage the cost to repair them can be excessive.

4. Can manufactured housing replacement occur if the applicant only owns the MHU and not the land, or the lot size is too small for new stick builds? Does this program allow for manufactured housing replacement with a stick-built structure?

No, Due to the repetitive loss because of natural disasters in this area, the state does not wish to replace damaged modular or mobile homes with mobile homes. Also, because of the way modular and mobile homes are constructed, when they reach a certain level of damage to specific areas of the home they cost to repair them is excessive.

Yes, this program allows for manufactured housing replacement with a stick-built structure.

5. Does this program allow for elevations?

Yes, provided that the costs are reasonable relative to other alternatives.

Also, the program has the following requirement on elevations for new construction, repair, or substantial damage, or substantial improvement:

All structures designed principally for residential use and located in the 100-year (or 1 percent annual chance) floodplain that receive assistance, must be elevated

with the lowest floor, including the basement, at least two feet above the base flood elevation. Mixed-use structures with no dwelling units and no residents below two feet above base flood elevation, must be elevated or floodproofed, in accordance with FEMA floodproofing standards at 44 CFR 60.3(c)(3)(ii) or successor standard, up to at least two feet above base flood elevation.

Buyout Program

1. Will the state clarify what recreational uses and development will be permitted in properties bought out by local governments?

The subrecipient will propose an end use for the properties to be bought out in the application submitted to the state. End uses must meet community needs for public space and a CDBG national objective. CDBG-DR funds are prioritized to address unmet housing need before moving on to other eligible activities.

2. Will the state be utilizing the LMB and LMHI national objectives for buyouts?

Yes. We have the national objectives in the Action Plan for this program as: Benefit to low- and moderate-income persons or households and Urgent Need (24 CFR 570.208(a); and, 24 CFR 570.208(c)). Low/Mod Buyout (LMB) and Low/Mod Housing Incentive (LMHI) are subcategories of the benefit to LMI persons.

3. Will DCA be asking for target areas from the local governments? How are these target areas being identified?

Target areas will be identified in the application submitted by the subrecipient. Sub recipients are encouraged to use buyouts strategically, as a means of acquiring contiguous parcels of land for uses compatible with open space, recreational, natural floodplain functions, other ecosystem restoration, or wetlands management practices. In addition, HUD has specified that the Most Impacted and Distressed (MID) areas will receive 80% of the total allocation.

4. Can a property that did not apply for the HMGP program still be qualified as severely damaged if they meet one of the other criteria items?

This would be determined by the subrecipient and reviewed by the state to ensure compliance.

Comments received from Shelena Hawkins on behalf of the City of Albany on December 15, 2018. DCA's responses were provided on December 19, 2018. Ms. Hawkins' questions are highlighted in green and DCA's responses are listed below each question.

- 1. In review of DCA's budget allocations as detailed in the Recovery Plan (page 59), line items are included for Administration, Planning, Affordable Multifamily Rental Program, Homeowner Rehabilitation, Buyout Program, and HMGP. Although these activities were also listed - Infrastructure and Economic Development are without a line item allocation of funding. My inquiry regards the demand to meet priority needs in these areas in tandem with housing redevelopment.**

Necessary infrastructure related to housing will be an allowable expense under the proposed programs. HUD requires each grantee to primarily consider and address its unmet housing recovery needs.

- 2. As I understand, additional funding may be forthcoming to address Infrastructure needs. However, it is also beneficial to add a line item for Economic Development as many local businesses can be assisted to revitalize impacted residential communities. SBA Assistance is beneficial; however, small businesses may not be able to incur additional debt that must be repaid, recover after the disaster (employees and the business), and continue to operate and serve the community in which it is located. As such, there is a need to assist these type businesses with DCBG-DR Funding.**

The Georgia Department of Community Affairs recognizes the need to assist the business community after a disaster. However, CDBG-DR funding comes from HUD with a priority to address unmet housing needs first. Per the Federal Register notice, "this notice requires each grantee to primarily consider and address its unmet housing recovery needs."

- 3. Additionally, new construction of single-family housing for homeownership was also not a line item within DCA's proposed budget. Rental housing and homeownership opportunities are both needed within the Albany community, especially after significant housing damages resulting from the January 2017 straightline winds and most recent hurricane. To retain homeowners within our communities, redevelopment communities to attract new ones, and to stabilize impacted neighborhoods, homeownership opportunities must also be advocated and supported. Although over 60% of housing units with the City are rental, homeowner units that are newer, energy efficient, and accommodating to household sizes should also be strongly advocated and supported. As such, there too is a need to provide homeownership opportunities within Albany communities.**

The 2017 tornados and Hurricane Irma created substantial damage to the three most impacted zip codes and 15 counties. While the Georgia Department of Community Affairs would like to offer all programs allowed under the CDBG-DR regulations, the unmet needs appropriation is simply not enough to do so. Based on available data, the programs that will address the greatest amount of housing unmet need are the Affordable Multifamily Rental Program, the Homeowner Rehabilitation Program, the Buyout Program, and the HMGP program.

Comments were received from Paul Forgey on behalf of the City of Albany on December 19, 2018. DCA responses were provided on December 19, 2018. Mr. Forgey's comments/questions are highlighted in green and DCA's responses are listed below each question.

1. Title of the document when viewed on the internet is "South Carolina Hurricane Matthew Action Plan Amendment 2."

DCA staff are aware of this defect and are working to correct it.

2. Page 1: Albany/Dougherty County not mentioned in "most dreadful effects" areas. Would seem to qualify with widespread damage and four fatalities.

Dougherty County has been included in the introductory statement.

3. Page 1: says most concentrated damage in Adel MHP. Was this worse than Radium Springs area? Adel was certainly worse by the number of fatalities, but property damage was extremely severe in this area of Dougherty County.

An edit has been made in the draft Action Plan. The original statement is listed below:

"The most concentrated damage was in the City of Adel, where one tornado hit the Sunshine Acres Mobile Home Park."

The statement has been changed to read:

"The tornados impacted residents within the City of Adel. One tornado hit the Sunshine Acres Mobile Home Park."

4. Page 3: Caption to first photo- "trailer park" should be mobile home park, and according to the Albany Herald website, the photo was courtesy of Darrell Ealum.

The suggested edits were incorporated into the plan.

5. Page 34: 2017 FEMA disaster totals. Chart a bit unclear. Perhaps add an additional line at bottom that shows "average" where appropriate rather than include in the "total." The "average FVL dollars" column is totaled at the bottom instead of averaged. The "% inspected with FVL" is correctly averaged, but would be more clear if not in the "total" column.

The suggested edits were incorporated into the plan.

6. The proposal eliminates all funding for infrastructure. The City of Albany has over \$4 million worth of unmet needs in this category. It is understood that the most critical need in the storm-affected counties is housing, but the City must emphasize its continuing need for infrastructure funding.

Necessary infrastructure related to housing will be an allowable expense under the proposed programs. The Georgia Department of Community Affairs recognizes the need to assist with other infrastructure needs after a disaster. However, CDBG-DR funding comes from HUD with a priority to address unmet housing needs first. Per the Federal Register notice, "this notice requires each grantee to primarily consider and address its unmet housing recovery needs."

7. Page 60, Affordable Multifamily Rental Program- eligibility for the LIHTC funding: Concern about the program being fully utilized, particularly considering that 80% of the \$12.5 million proposed will go to the three most affected zip codes. This would require that these three zip codes have existing LIHTC projects with funding gaps, or the ability to successfully acquire new credits under the 2019 set aside. Putting all of the funding for rental repair into this category eliminates other rental housing rehabilitation/ new construction options and may be difficult to fully utilize.

In an effort to have the greatest impact, achieve maximum leverage of and depending of readiness of the projects, LIHTC projects will be given priority. However, developments under this program are not required to utilize Low-Income Housing Tax Credits (LIHTC).

8. Page 62, Buyout Program: Second paragraph states that the “post-purchase fate of acquired properties will be determined by the local government...” Hopefully that will give the local government the option of continued residential use, providing the new construction meets floodplain management requirements. The storm impacted neighborhoods in Dougherty County and the City of Albany do not generally need additional greenspace, which places a maintenance burden on the local governments. The areas have existing infrastructure which would be more efficient to reutilize than abandon. Providing services to the remaining residences will become disproportionately expensive without replacement of the demolished homes. With proper construction, the neighborhoods will become more resilient and add vitality to the affected areas.

DCA will work with the local governments to help create the most beneficial end uses for buyout properties that are compliant with the post-acquisition land-use restrictions as defined by the Federal Register notice.

9. Page 63, Hazard Mitigation Grant Program: the “projected accomplishments” states that an estimated 70 households will be served. Does this mean that only homeowner activities will be funded? What about local government HMGP? The second paragraph titled “leveraging of funds” is unclear. Is the intent to use the HMGP funding to match the other sources listed as well?

The CDBG-DR HMGP program is intended to assist local governments with the required 15% match for HGMP activities. The content under the “Leveraging of Funds” section has been changed to read:

DCA will encourage subrecipients to leverage CDBG-DR funds with funding provided by other federal, state, local, private, and nonprofit sources to utilize the limited CDBG-DR funds. This will be specifically encouraged for the homeowner buyout programs. By encouraging local governments to use CDBG-DR as match for the FEMA Hazard Mitigation Grant Program communities will be able to better utilize this funding source as often local governments cannot afford match for HMGP program.

The list of sources provided refers to other disaster relief sources. The title of the section this text was located in has been changed to “Additional Resources”.