



GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS

State of Georgia
CDBG-DR 2023-2024
Hurricanes Action Plan



Record of Amendments

The following table summarizes amendments to the State of Georgia's Disaster Recovery Action Plan.

Date Action Plan was Submitted to HUD
TBD

Date Amendment Approved by HUD	Amendment Number	Description of Amendment

Table of Contents

- Record of Amendments 2**
- Table of Contents 3**
- Definitions and Acronyms..... 4**
- 1. Executive Summary 5**
 - 1.1. Overview 5
 - 1.2. Disaster-Specific Overview 6
 - 1.3. Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessment Summary 16
- 2. Unmet Needs Assessment 17**
 - 2.1. Housing 17
 - 2.2. Infrastructure 46
 - 2.3. Economic Revitalization 52
 - 2.4. Unmet Needs Summary 54
- 3. Mitigation Needs Assessment 55**
 - 3.1. Georgia Hazard Mitigation Strategy 55
 - 3.2. Overview of Hazard Mitigation Needs by Program Area 61
 - 3.3. Mitigation Needs Summary 69
- 4. Fair Housing and Civil Rights Data Collection..... 71**
 - 4.1. Populations with Limited English Proficient (LEP) 72
 - 4.2. Persons Belonging to Protected Classes..... 74
 - 4.3. Persons Belonging to Protected Classes by Housing Tenure 80
 - 4.4. Persons Belonging to Vulnerable Populations..... 81
 - 4.5. Persons Belonging to Historically Distressed and Underserved Communities..... 82
 - 4.6. Indigenous Populations and Tribal Communities..... 83
 - 4.7. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)..... 84
- 5. Connection Between Proposed Programs, Needs Assessments, Fair Housing, and Civil Rights Data 87**
 - 5.1 Allocation, Award Caps, Funding Criteria 90
 - 5.1.1 Administration.....90
 - 5.1.2 Planning91
 - 5.1.3 Housing91
 - 5.1.4 Infrastructure96
 - 5.1.5 HMGP Match Activities.....98
 - 5.1.6 Public Services100
 - 5.1.7 CDBG-DR Mitigation Set-Aside100
- 6. General Information 100**
 - 6.1 Citizen Participation..... 100
 - 6.2 Modification to the Action Plan 106
- 7. Table of Figures 108**
- 8. Action Plan Appendix..... 111**
 - 8.1 MID Expansion Request.....111
 - 8.2 Summary of and Response to Public Comments119

Definitions and Acronyms

Acronym	Definition
AAN	Allocation Announcement Notice
ACS	American Community Survey
CDBG-DR	Community Development Block Grant - Disaster Recovery Program
CDC	Centers for Disease Control and Prevention
EIDL	Economic Injury Disaster Loan
FEMA	Federal Emergency Management Agency
FVL	FEMA Verified Loss
GEMA	Georgia Emergency Management Agency
GHARRP	Georgia Housing Authorities Risk Retention Pool
GHMS	Georgia Hazard Mitigation Strategy
HA	FEMA Housing Assistance
HIRA	Hazard Identification and Risk Assessment
HMGP	FEMA Hazard Mitigation Grant Program
HOI	Homeowners Insurance
HUD	United States Department of Housing and Urban Development
IA	FEMA Individual Assistance Program
IHP	FEMA Individual Housing Program
LMI	Low- and Moderate-Income persons
MID	Most Impacted and Distressed County, as identified by HUD
NFIP	National Flood Insurance Program
NOAA	National Oceanic and Atmospheric Administration
ONA	FEMA Other Needs Assistance
PA	FEMA Public Assistance Program
PDA	Preliminary Damage Assessment
PHA	Public Housing Authority
PPFVL	Personal Property FEMA Verified Loss
R/ECAP	Racially and Ethnically Concentrated Areas of Poverty
RPFVL	Real Property FEMA Verified Loss
SBA	U.S. Small Business Administration
SHMP	State Hazard Mitigation Plan
SLOSH	Sea, Lake, and Overland Surges from Hurricanes
SoVI	Social Vulnerability Index
SRL	Severe Repetitive Loss
TreeS-DIP	Tree Structure Damage Impact Predictive
UGLG	Units of General Local Government

1. Executive Summary

1.1. Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Georgia will receive \$265,726,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following the 2023-2024 Hurricanes; Hurricane Idalia (DR-4738), Tropical Storm Debby (DR-4821), and Hurricane Helene (DR-4830), through the Georgia Department of Community Affairs (DCA). In this Action Plan, the three hurricanes will be referred to collectively as the 2023-2024 Hurricanes. CDBG-DR funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet needs in the HUD-identified and state-identified Most Impacted and Distressed (MID) counties. The HUD-identified MID counties are Appling, Atkinson, Bacon, Berrien, Bryan, Burke, Candler, Clinch, Coffee, Columbia, Emanuel, Jeff Davis, Lanier, Laurens, Lowndes, McDuffie, Richmond, Toombs, Treutlen, and Wheeler. In the Allocation Announcement Notice (AAN) (90 FR 4759) HUD identified McDuffie, Emanuel, Candler, Toombs, Bryan, Appling, Bacon, Atkinson, Clinch, Lanier, Berrien, Jeff Davis, Wheeler, Laurens, and Treutlen Counties by zip code. For Counties identified by zip code, the State has elected to expand eligibility to the whole county as allowed by the Universal Notice, III.D.2 – MID areas.

The State is requesting that HUD expand the list of MID designated areas to include 24 additional counties that meet the HUD unmet needs threshold of \$2,000,000 for a zip code and \$10,000,000 for a county designation. The additional counties identified by the State as MID eligible are Ben Hill, Brooks, Bulloch, Chatham, Colquitt, Cook, Effingham, Evans, Glynn, Jefferson, Jenkins, Johnson, Liberty, Lincoln, Long, Pierce, Screven, Tattnall, Telfair, Tift, Ware, Washington, Wayne, and Wilkes. This request was submitted to HUD on March 7, 2025, and is pending at the time of publication. The request is included in the appendix of this Action Plan as an exhibit. If HUD does not approve this expansion, the State plans to include the identified counties as state-identified MID. For purposes of this Action Plan, while the request is pending, the counties will be referred to as state-identified MID counties.

The purpose of this allocation is to address unmet needs identified as a result of the 2023-2024 Hurricanes and to mitigate further damage in the event of future disasters. When assistance from other sources like the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) is exhausted or unavailable, CDBG-DR funds can be used to fill the gaps in funding where needed. DCA seeks to help provide the resources that communities and individuals need to address long-term recovery efforts. In response, this Action Plan serves as an illustration of the processes and programs set forth to support housing, infrastructure, and mitigation measures through CDBG-eligible disaster recovery activities. HUD has allocated \$265,726,000 in CDBG-DR funds to the State of Georgia in response to the 2023-2024 Hurricanes (DR-4738; DR-4821; DR-4830) through the publication of the Federal Register, Vol. 90 No. 10, Thursday, January 16, 2025. This allocation was made available through Public Law 118-158.

1.2. Disaster-Specific Overview

The 2023-2024 hurricanes brought devastating impacts to the State of Georgia, severely affecting homes, agriculture, and infrastructure. Between August 30, 2023, and September 27, 2024, three major storms – Hurricane Idalia, Tropical Storm Debby, and Hurricane Helene – hit the state, causing widespread flooding, extensive property damage, and long-term disruptions. Most of the impacts from these hurricanes occurred in Georgia’s Coastal Plain, a region that slopes rapidly from north to south, creating a series of waterfalls, with several major rivers flowing through it and emptying into the Atlantic Ocean. The Coastal Plain’s floodplain is a low-lying, flat area prone to flooding, particularly along rivers and the coast. The area includes wetlands, swamps, and forests, with sediments composed of limestone, clay, and sand.

The combination of these environmental features and the intensity of the storms led to widespread devastation - impacting homes, businesses, and infrastructure across 94 of Georgia’s 159 counties. Tragically, Hurricane Helene alone caused the deaths of 34 Georgians, with a total of 36 lives lost across all three disasters. The destruction left by these storms continues to challenge both residents and local governments. The hurricanes and tropical storms not only caused loss of life, injuries, and property damage but also left lasting challenges for recovery. The three hurricanes that struck Georgia occurred in a matter of just 13 months, causing compounding challenges. A detailed timeline of the 2023-2024 Hurricanes and the longer recovery process is below:

August 2023

August 30 Hurricane Idalia struck Georgia as a Category 2 storm confirmed in Humboldt County.

August 2024

August 4 Tropical Storm Debby struck Georgia.

December 2024

December 20 Congress approved a Disaster Appropriation bill including funds for HUD to be used for CDBG-DR.

April 2025

April 21 Public Action Plan due to HUD

September 2023

September 7 President Biden signed a major Disaster Declaration for Hurricane Idalia.

September 2024

September 24 President Biden signed a major Disaster Declaration for Tropical Storm Debby.

September 26-27 Hurricane Helene struck Georgia as a Category 1 storm.

September 30 President Biden signed a major Disaster Declaration for Hurricane Helene.

January 2025

January 16 HUD published Allocation Announcement Notice (AAN) awarding Georgia \$265,726,000 for the 2023/2024 disasters.

January 21 AAN becomes applicable



Figure 1: Photo: Hurricane Helene Damage (Source: John Falchetto / The Atlantic, 09/25/24)

The following paragraphs outline the specific impacts of each storm and the ongoing efforts to rebuild and recover across the state.

Hurricane Idalia (DR-4738)

On Wednesday, August 2, 2023, Hurricane Idalia struck Georgia as a Category 2 storm, causing widespread destruction across the Southeast. It was the only hurricane to make landfall in the United States in 2023. Hurricane Idalia brought sustained winds of 60-70 mph, with gusts reaching up to 90 mph and torrential rainfall totaling 7 to 10 inches. The storm's effects were felt well inland, where dangerous winds, flooding, and tornadoes wreaked havoc, including three EF-0 tornadoes and one EF-1 tornado. Storm surge inundation of 2 to 4 feet affected southern Georgia, with St. Simon and Tybee Islands reporting wind gusts of 65 mph and 69 mph, respectively. Over 190,000 Georgia residents lost power, and communities throughout the region were affected by flooding, downed trees, and powerlines. In Valdosta alone, more than 1,000 homes were damaged, with trees falling on houses and roads, including Interstate-75, which had to be shut down. Additionally, roofs were torn off homes across the area. The severe flooding and damage caused by the storm's heavy rains and high winds led to further impacts across the state, particularly to crops. Additionally, the storm resulted in one weather-related death in Lowndes County.

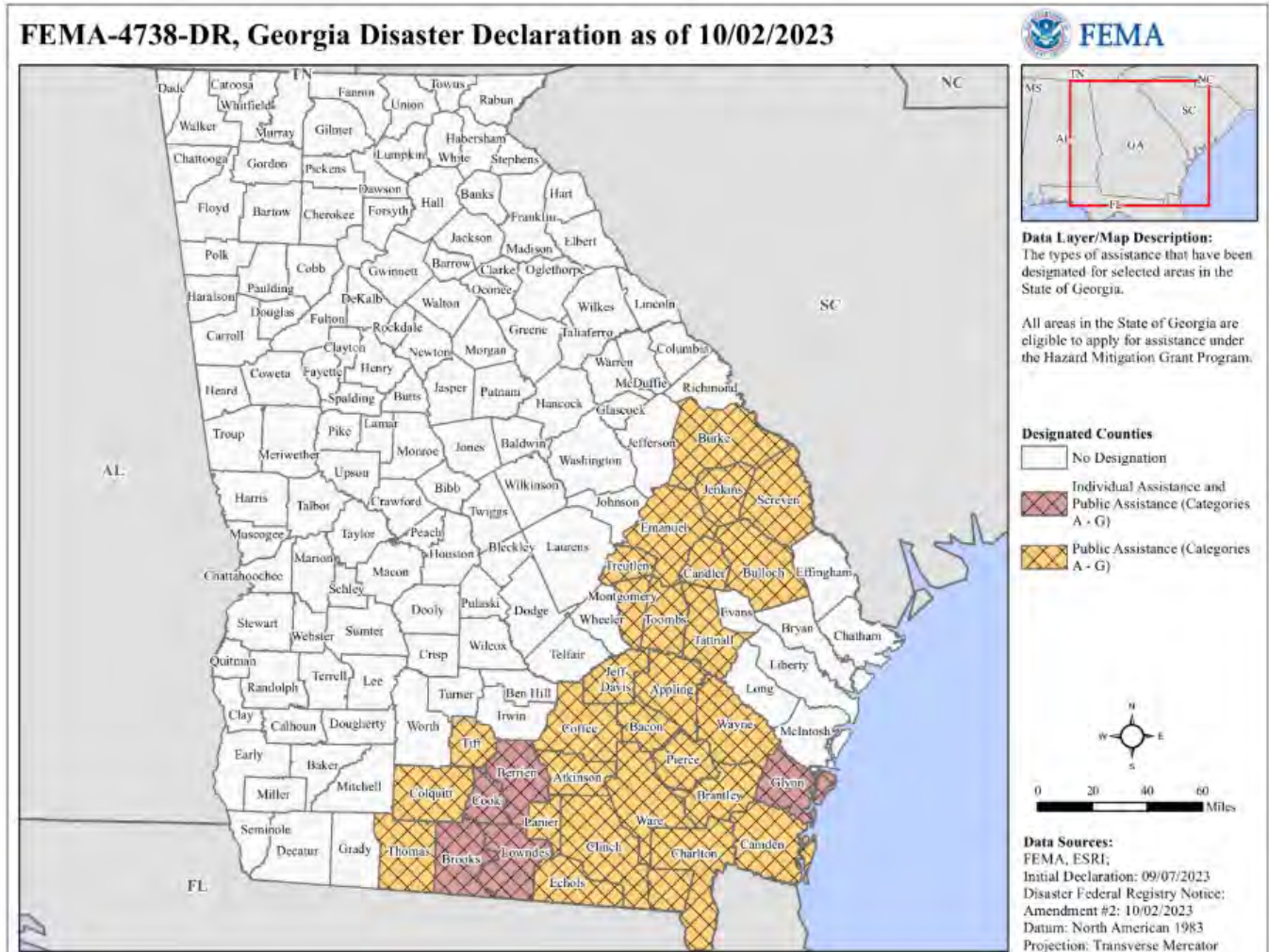


Figure 2: Georgia Disaster Declarations (10/02/23) (Source: FEMA)

The map above reflects the counties in Georgia impacted by Hurricane Idalia, which were designated as such by the FEMA Individual Assistance (IA) and Public Assistance (PA) declarations. The figure below demonstrates the extent of sustained high winds from Idalia impacting Georgia.

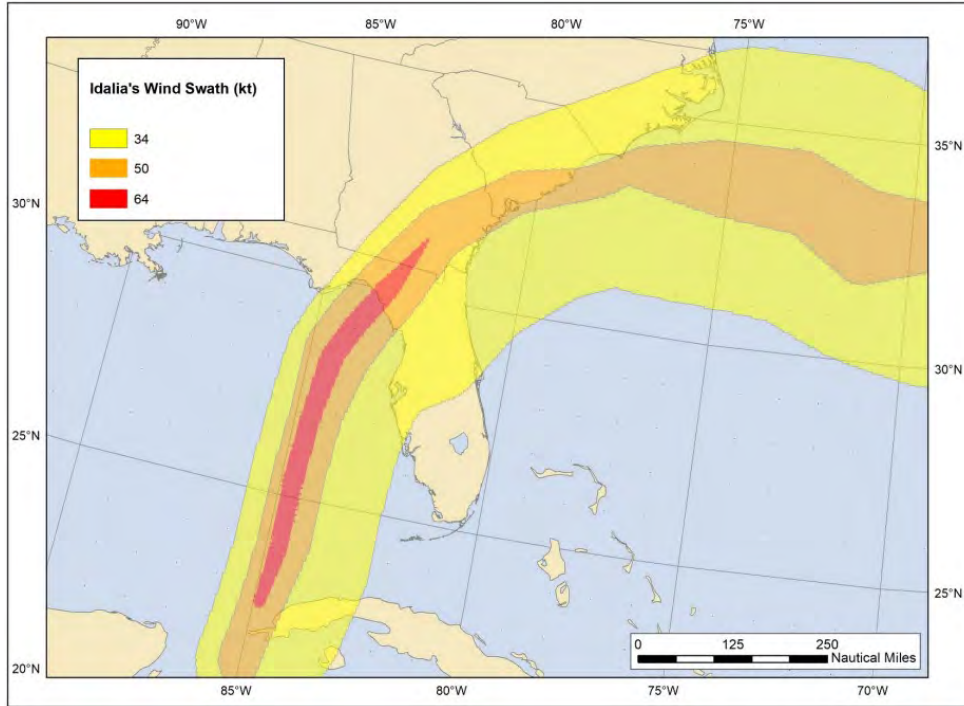


Figure 3: Hurricane Idalia Wind Swath (Source: NOAA)

Hurricane Idalia also caused widespread flooding, particularly throughout southeast Georgia, due to the intense rainfall. The map below shows the total rainfall for the storm.

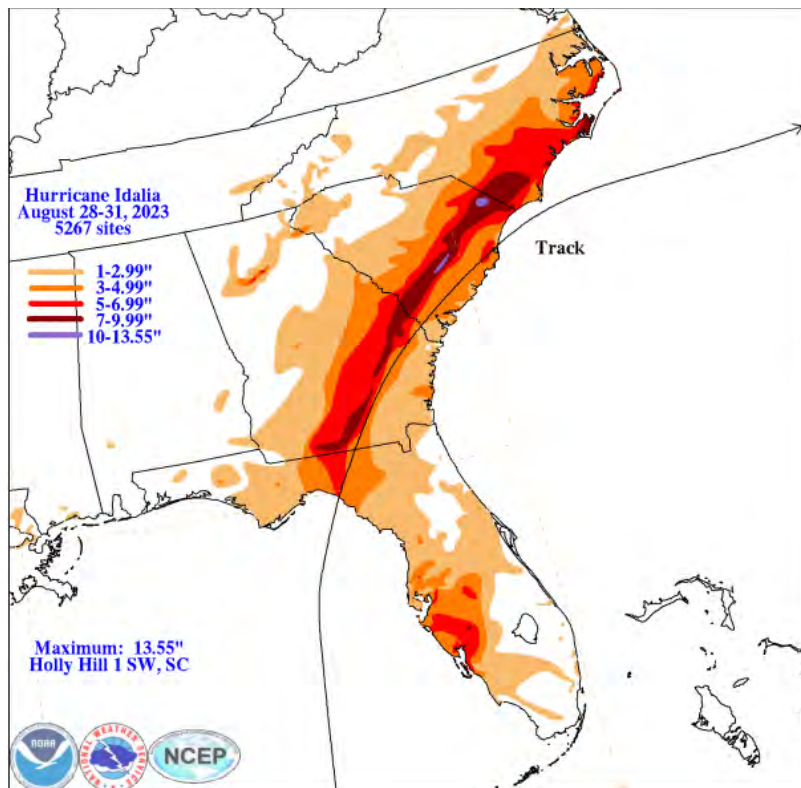


Figure 4: Total Rainfall (inches) from Hurricane Idalia (Source: NOAA)

Tropical Storm Debby (DR-4821)

Less than 12 months after the devastation of Hurricane Idalia, Georgia was struck again on August 4, 2024, by Tropical Storm Debby, which brought widespread flooding, significant wind damage, and power outages across the state. The slow-moving storm dumped 10 to 15 inches of rain across eastern Georgia, with sustained winds of 40 mph reaching up to 205 miles from the storm's center. Bryan County saw 6 to 11 inches of rain, causing record river crests on the Ogeechee and Black Creek rivers, resulting in severe flooding. Bulloch County experienced the breach of several dams, with around 100 roads damaged. The rain, flowing southward from northern Georgia, overwhelmed dams and flooded areas not typically prone to such conditions. Many of these areas were outside of flood zones, and as a result, many homeowners were without flood insurance, significantly increasing the financial impact of the storm. Coastal areas faced severe damage to homes and contents, with flooded basements, destroyed belongings, and some homes completely destroyed. The storm also caused extensive agricultural losses, including the destruction of hundreds of pecan trees and more than half of the state's tobacco crops.¹ At least 69,000 homes lost power as numerous trees and power lines were downed across the region. Tragically, in Moultrie, Georgia, a 19-year-old boy was killed when a tree fell on his home. The flooding trapped many residents in their homes, requiring emergency evacuations. Private dams, many of which were destroyed, were not eligible for Federal Emergency Management Agency (FEMA) funding, compounding the crisis. In the aftermath, continued rainfall led to further flooding, with dams failing, creeks and streams overflowing, and streets turning into rivers. This catastrophic flooding caused severe property damage and worsened agricultural losses, particularly affecting farmers already struggling from previous storms. The prolonged flooding and wind damage left communities reeling, increasing financial strain and delaying recovery efforts across the state.

¹ https://www.nhc.noaa.gov/data/tcr/AL042024_Debby.pdf

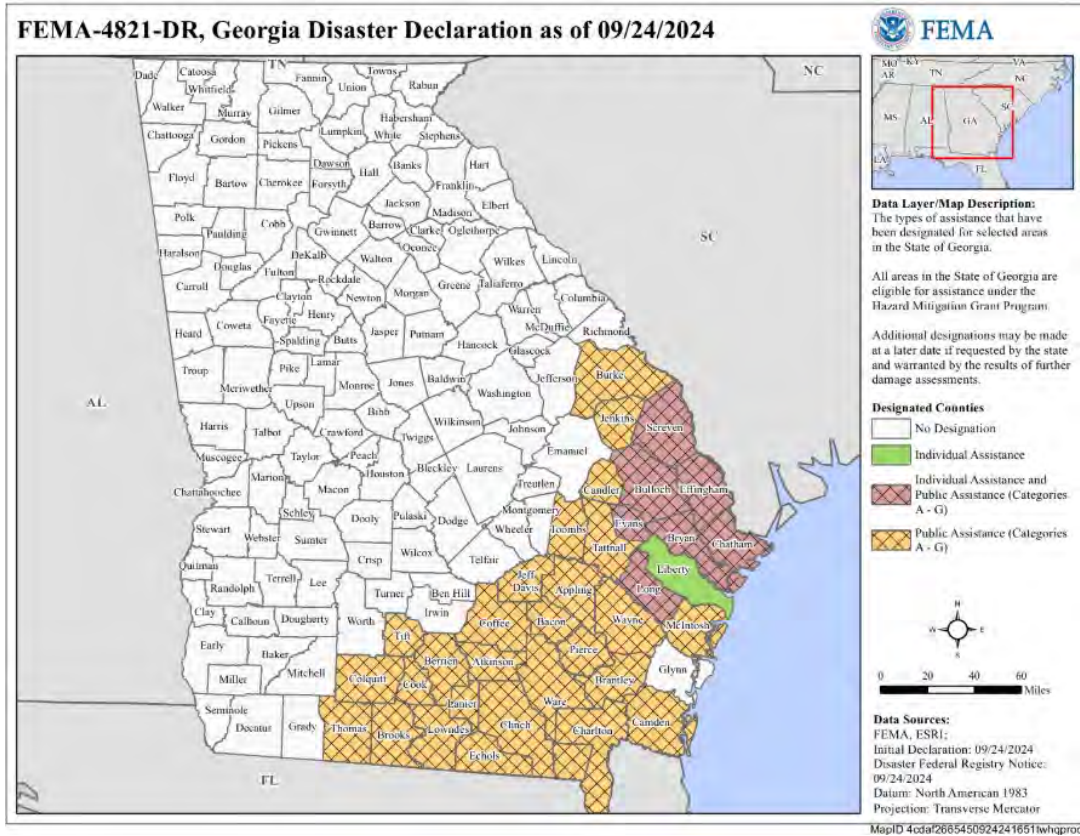


Figure 5: Georgia Disaster Declarations as of 9/24/24 (Source: FEMA)

Tropical Storm Debby caused widespread flooding across eastern Georgia, with 10 to 15 inches of rain in some areas - including 6 to 11 inches in Bryan County, leading to record river crests and severe flooding. The rain overwhelmed dams and flooded areas outside typical flood zones, where many homeowners did not have flood insurance. Coastal areas suffered extensive flooding, destroying homes and belongings. Continued rainfall caused further flooding, with dams failing, creeks overflowing, and streets completely flooded, resulting in severe property damage and agricultural losses.

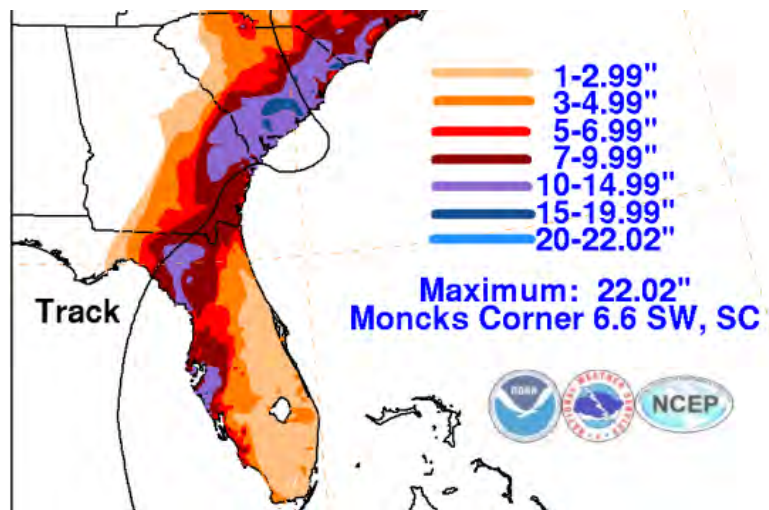


Figure 6: Tropical Storm Debby's Total Rainfall in Inches (Source: NOAA)

Hurricane Helene (DR-4830)

Only two days after President Biden signed a Disaster Declaration for Tropical Storm Debby, Hurricane Helene struck Georgia on September 26, 2024, making landfall as a Category 4 storm in Taylor County, Florida, near the Aucilla River, before moving into Lowndes County in South Central Georgia and then up the I-75 corridor bringing destructive winds throughout the next day.

Georgia’s agricultural industry was heavily impacted, with significant crop losses, damage to timberlands, and flooded crop fields. The storm caused record-breaking rainfall in Atlanta, contributing to massive flooding across the state. Power outages caused long-term disruptions, leaving many communities without power, water, and basic services for days. Cleanup and power restoration efforts were monumental, involving the replacement of over 11,800 power poles, 1,500 miles of wire, and the removal of more than 3,200 trees from power lines.² Tornadoes spawned by the storm’s outer rainbands, including one EF-0 in Burke County, further contributed to the devastation. The storm’s impact was unlike anything most Georgians had ever seen. In total, Hurricane Helene killed 34 people, damaged more than 200,000 homes, and left 2 million people without power. Residents continue to deal with the storm’s aftermath, with many damaged roofs, downed trees, and other property damages.

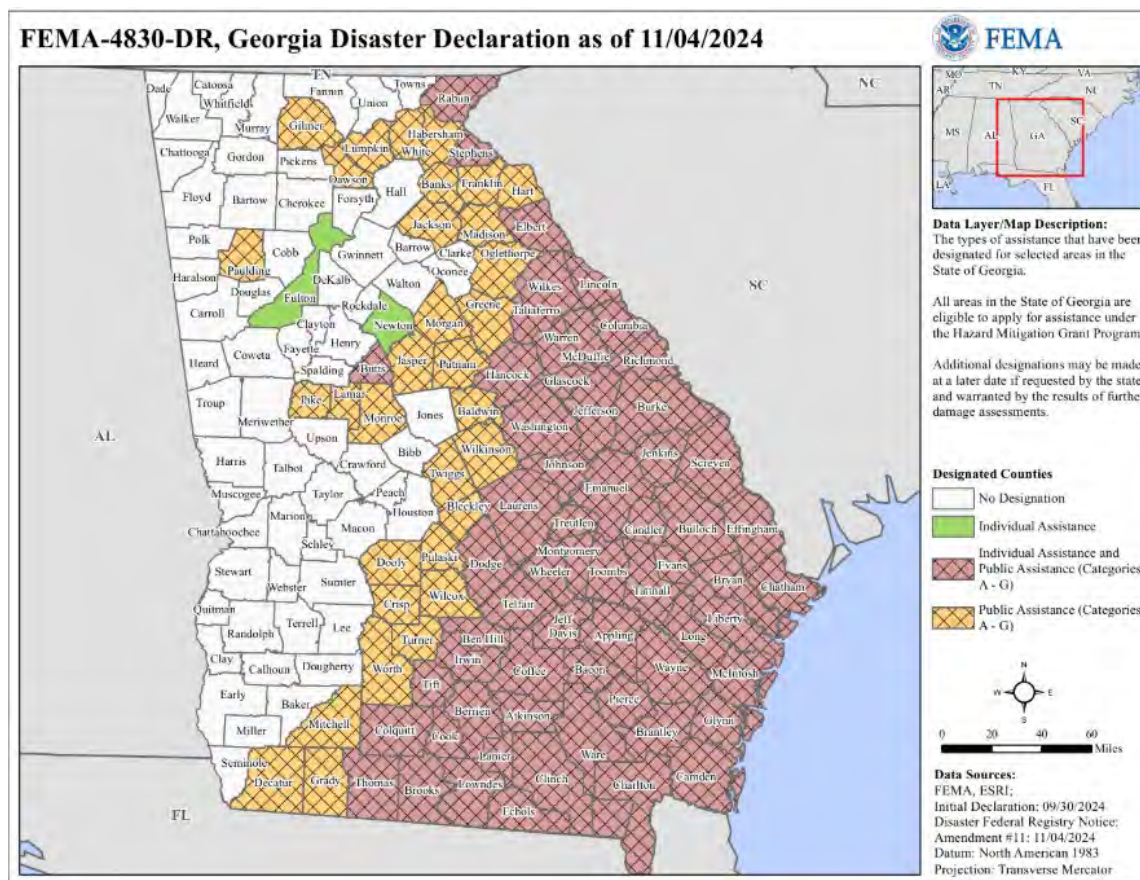


Figure 7: Georgia Disaster Declarations (11/04/24) (Source: FEMA)

² <https://www.georgiapower.com/about/company/helene-assistance.html#:~:text=By%20dawn%20Friday%20morning%2C%20Helene,Georgia%20Power's%20140-year%20history>

As seen in the map below, Hurricane Helene made landfall as a Category 4 Hurricane in Taylor County, Florida, then moved to Lowndes County in South Central Georgia with wind gusts of 90 to 100 mph that spread inland along the I-75 corridor, causing widespread destruction. The hurricane tore off roofs, uprooted trees, and caused severe damage to homes, particularly in Valdosta and Lowndes County, where 933 homes were either destroyed or heavily damaged. In addition to the destructive winds, the storm brought torrential rainfall, with some areas receiving more than 13 inches, exacerbating flooding and making it easier for trees to fall. The catastrophic flooding, along with fallen trees, led to numerous injuries and 34 fatalities in Georgia, particularly from trees striking homes and vehicles. Power outages and storm surges caused long-term disruptions, leaving many communities without power, water, and basic services for days. The Tree Structure Damage Impact Predictive (TreeS-DIP) map below shows the damages across Georgia.

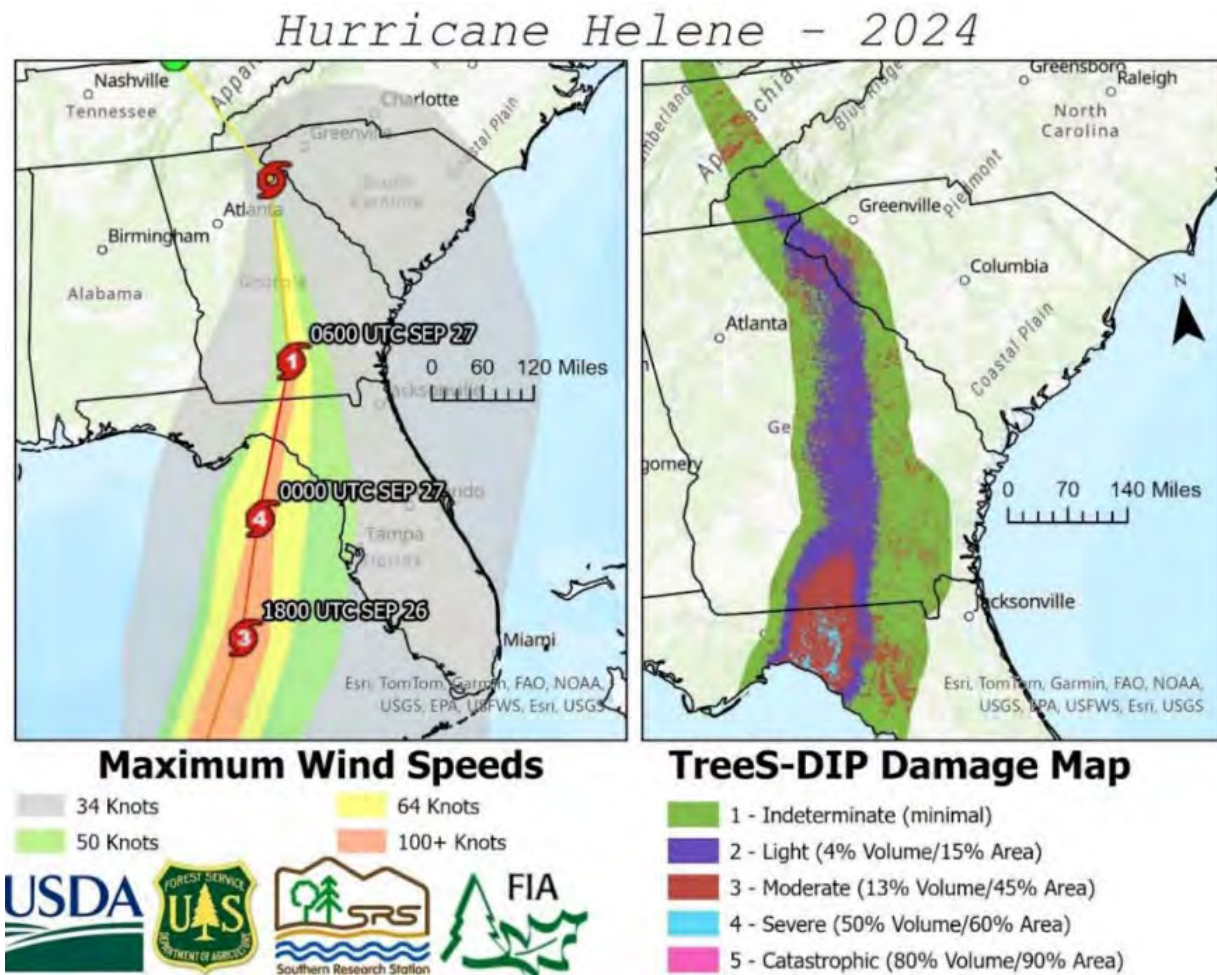


Figure 8: Hurricane Helene Maximum Wind Speeds and TreeS-DIP Damage (Source: NOAA, GTAC)

Despite the immense challenges posed by the 2023-2024 Hurricanes, Georgia’s communities have demonstrated remarkable resilience. Local citizens, government agencies, and organizations came together quickly to provide immediate relief, secure federal disaster aid, and begin the long process of rebuilding. However, the scale of destruction requires continued support to ensure a full recovery. Through collaboration and sustained efforts, Georgia is focused on rebuilding its housing and infrastructure, while also strengthening its ability to withstand future disasters. The recovery will be a

lengthy and difficult journey, but with additional support, Georgia will not only restore what was lost but also enhance its resilience against future disasters, transforming communities into healthier, well-adapted strongholds.

Having analyzed the best available housing, infrastructure, and economic data from the 94 impacted counties, DCA estimates the overall unmet need from the 2023-2024 Hurricanes at \$1,460,154,354. The bulk of the unmet need is in housing, accounting for \$1,102,522,201, or 76% of the overall unmet need. Infrastructure needs account for \$179,355,554, or 12% of the overall unmet need. Economic revitalization needs account for \$178,276,598, or 12% of the overall unmet need.

1.2.1. Most Impacted and Distressed Areas

HUD-Identified MID Areas

Among the three Presidentially Declared disasters, there were 94 counties eligible for Individual Assistance (IA) and/or FEMA Public Assistance (PA) funds.

On December 20, 2024, Congress approved a Disaster Appropriation bill, including funds for HUD to be used for CDBG-DR. On January 16, 2025, HUD published its Federal Register Notice, allocating funds that included a total of \$265,726,000 for the State of Georgia. Within the notice, 22 counties were determined by HUD as Most Impacted and Distressed (MID). One county, Lowndes, was listed twice, and another county was listed erroneously, leaving a total of 20 HUD-identified MID counties.

HUD-Identified MID Counties			
Appling	Burke	Emanuel	McDuffie
Atkinson	Candler	Jeff Davis	Richmond
Bacon	Clinch	Lanier	Toombs
Berrien	Coffee	Laurens	Treutlen
Bryan	Columbia	Lowndes	Wheeler

Figure 9: HUD-Identified MID Counties (Source: Federal Register)³

State-Identified MID Areas

There were 94 counties in the State of Georgia that received either FEMA Individual Assistance (IA) or Public Assistance (PA) under one or more of the three disasters in 2023-2024. Combined, these 94 counties account for an estimated 4,073,152 residents (2023), or 37% of the state’s entire population. For this Unmet Needs Assessment, the State analyzed all 94 counties, including the 20 HUD-identified MID counties, for housing, infrastructure, economic revitalization, and mitigation needs. Based on the results of this unmet needs analysis, the State of Georgia has identified 24 additional counties as state-identified MID Counties:

³ [90 FR 4759]

State-Identified MID Counties			
Ben Hill	Effingham	Liberty	Telfair
Brooks	Evans	Lincoln	Tift
Bulloch	Glynn	Long	Ware
Chatham	Jefferson	Pierce	Washington
Colquitt	Jenkins	Screven	Wayne
Cook	Johnson	Tattnall	Wilkes

Figure 10: State-Identified MID Counties

As mentioned above, the State has requested that HUD expand the MID area to include these counties. While that request is pending, the additional 24 counties will be considered state-identified MID Counties, bringing the total number of MID counties to 44.

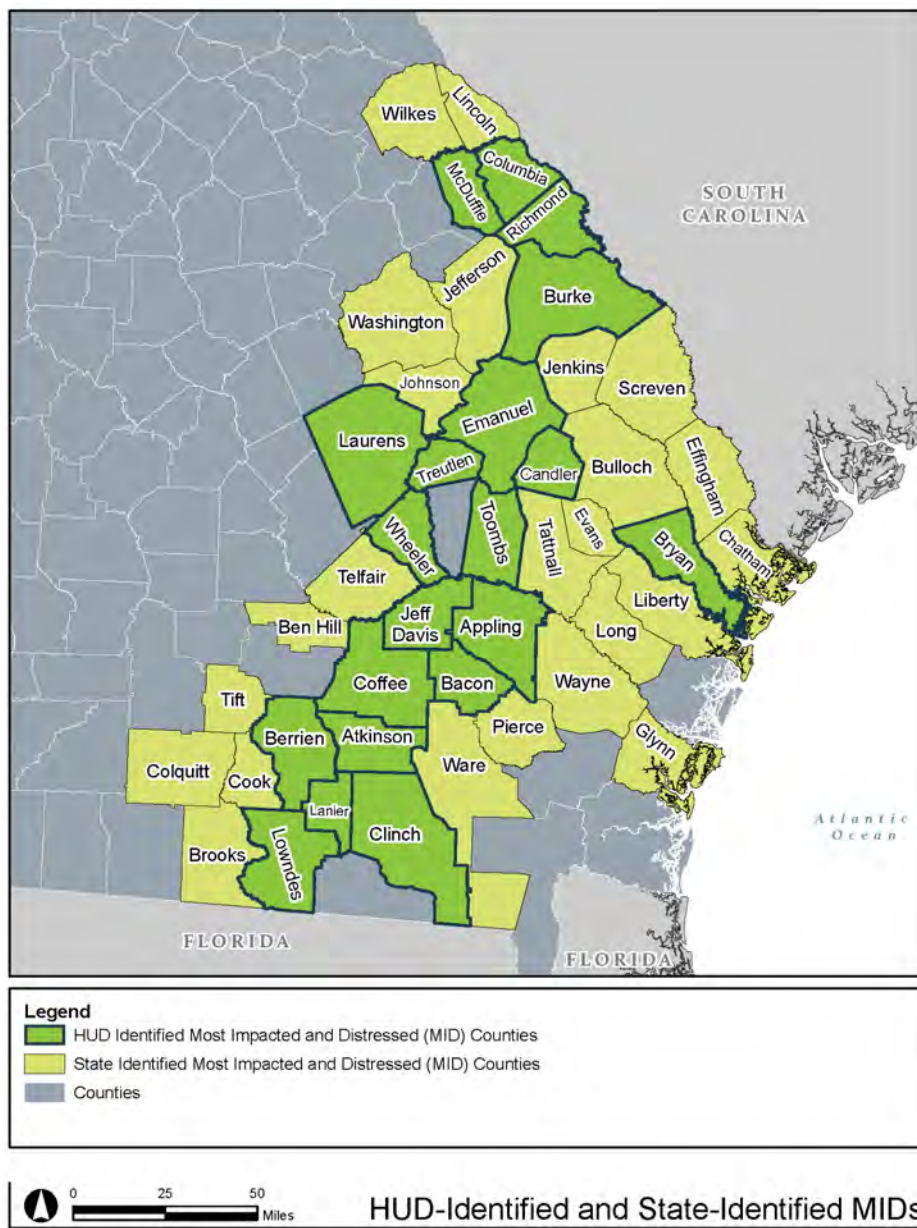


Figure 11: HUD-MID and State-MID Map

1.3 Unmet Needs, Mitigation Needs, and Fair Housing and Civil Rights Assessment Summary

After considering the identified primary unmet needs, citizen input, and the availability of funds awarded, DCA is proposing multiple programs to address unmet needs in Housing, Infrastructure, and Mitigation. For Housing, DCA is proposing three programs – a Homeowner Rehabilitation and Reconstruction Program (HRRP) for single-family homes, an Affordable Rental Rehabilitation Program (ARRP) for landlords, and an Affordable Rental Housing Development Program for affordable rental housing in the MID areas. The ARRP will seek to provide safe and affordable rental units that are in short supply. To fill identified gaps in Infrastructure, DCA will also fund a competitive infrastructure program for MID communities and an HMGP Match Program. Activities funded through the Mitigation Set-Aside will be incorporated into the Housing and Infrastructure programs.

Allocation Summary					
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD-Identified MID Areas	Estimated % to LMI
Administration	\$13,286,300	5%			
Planning	\$3,500,000	1.3%	0%		
Housing	\$188,939,700	71.1%	6.5%	90%	80%
Infrastructure	\$50,000,000	18.8%	24.7%	80%	70%
HMGP Match*	\$10,000,000	3.8%	100%	80%	70%
Public Services	\$0	0%	0%	n/a	n/a
Exempt Public Services	\$0	0%	0%	n/a	n/a
Total	\$265,726,000	100%	15%	82%	73%
% of Total	100%	100%	15%	82%	73%

*HMGP Match is a distinct program for the Mitigation Set-Aside. The Mitigation Set-Aside also includes funding for mitigation measures in the Housing and Infrastructure allocation amounts.

Figure 12: Unmet Needs, Mitigation Needs, Fair Housing and Civil Right Assessment Summary

2. Unmet Needs Assessment

Per 90 FR 4759, HUD requires the State to conduct an unmet needs assessment to identify and quantify impacts from the disaster event, account for any potential financial recovery assistance, and identify what recovery gaps may remain. The unmet needs assessment informs program development and helps the state to ensure recovery funds are used effectively for long-term recovery.

DCA analyzed the best available data in the areas of Housing, Infrastructure, and Economic Revitalization within the 94 impacted counties to evaluate the effects on those communities. Hurricane Helene had the largest impact on all sectors of recovery, and the full scope of damage from Helene is still being ascertained. The State will continue to revisit and reevaluate unmet recovery needs and make updates as additional data becomes available and program modifications are contemplated.

2.1. Housing

To show the impact of Idalia, Debby, and Helene on housing, DCA gathered the best available data - including FEMA Individuals and Households (IHP) applications, Small Business Loan Applications, National Flood Insurance Program claims, public housing damage reports, Red Cross shelter reports, U.S. Census Bureau data, and state homeless shelter numbers. DCA calculated an estimated loss amount to assess the total financial impact these three disasters had on the residents of Georgia. All awards that have been disbursed to disaster survivors through these programs were subtracted from the estimated total loss, showing a total housing unmet need of \$1,102,522,201. The below sections explain the housing impacts of the 2023-2024 Hurricanes on survivors in all declared IA counties. This analysis is the basis of the total housing unmet need.

The total impact is summarized based on owner-occupied vs. renter-occupied households, impact per disaster, impact on mobile home populations, impacted populations with and without insurance, impact by residence type, impact by gross income, and impact on housing authorities.

The map below compares the estimated unmet need amount based on FEMA individual assistance data to the areas of the state that are low-to-moderate income (LMI). In most of the HUD and state-identified MID counties, there is an overlap between the unmet housing need and a lack of economic resources. For example, zip codes in coastal Richmond and Columbia counties, Central Lowndes, and Central Laurens counties contain over \$14,630,720 in unmet housing needs in areas where over half of the households earn less than 80% of the area median income. Further, a majority of the impacted region, especially in the central region of the map near Emanuel, Toombs, Jeff Davis, Bacon, and Appling, contain a concentration of zip codes with between \$3,890,817 - \$26,311,958 of unmet needs. The funding awarded will address some of the high unmet needs and low economic resources to ensure that the most vulnerable populations receive the assistance they need to recover and rebuild.

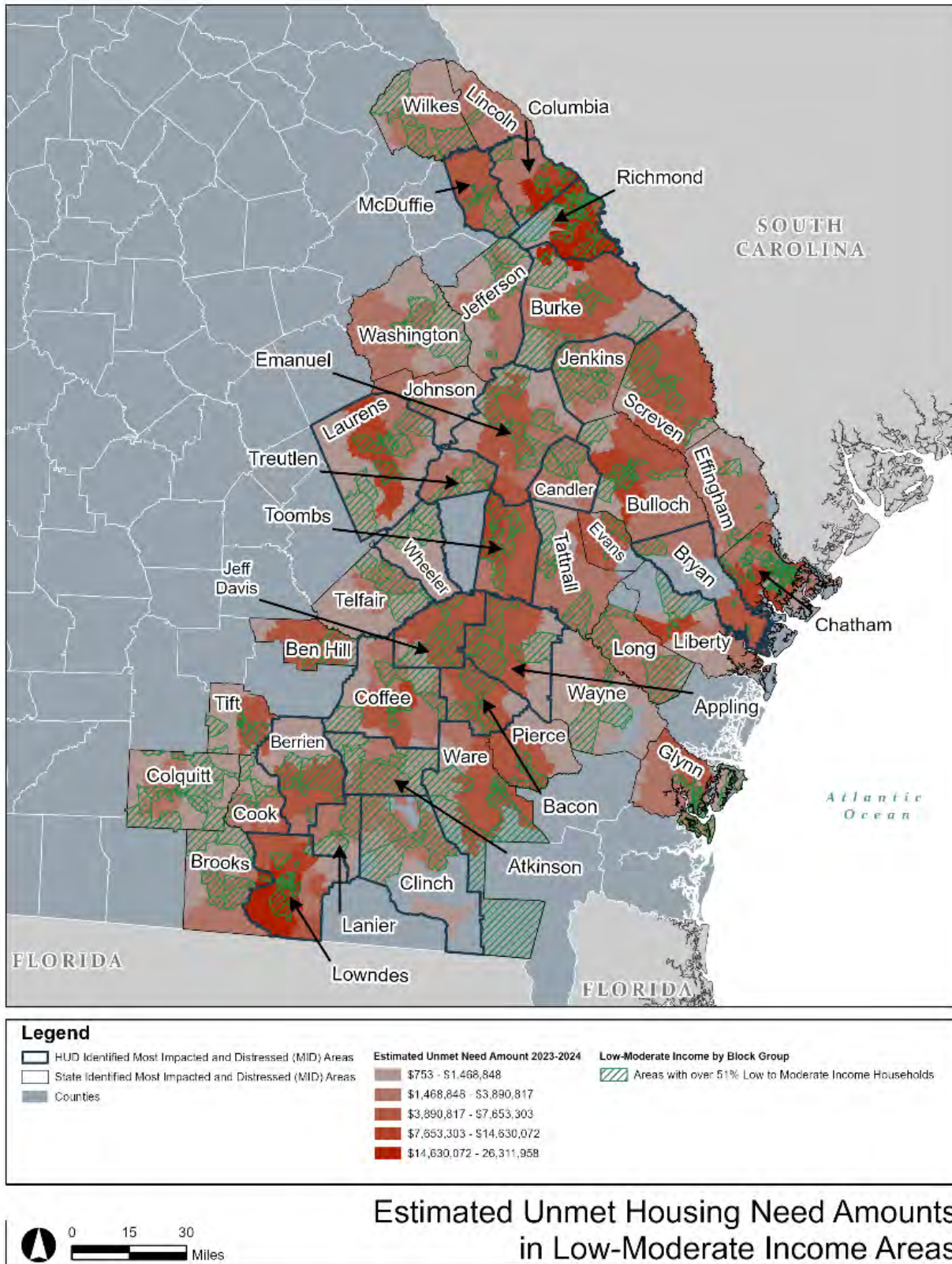


Figure 13: Estimated Unmet Housing Need in LMI Areas

Housing Types Affected

Residential losses varied across Georgia among the three disasters. By dollar amount, houses and duplexes accounted for the majority (54.9%), followed by mobile homes (21.2%) and apartments (13.3%). Other losses included miscellaneous structures (6.5%), townhouses (2.4%), and travel trailers (just under 1%). Additional residence types—such as assisted living facilities, boats, college dorms, condos, correctional facilities, and military housing—each contributed less than 1% of the total loss.

Impacted Housing Types and Estimated Loss				
Residence Type	# of HH	% of HH	Estimated Loss	% of Estimated Loss
Apartment	58,280	14.25%	\$81,351,705	13.28%
Assisted Living Facility	316	0.08%	\$440,976	0.07%
Boat	57	0.01%	\$91,941	0.02%
College Dorm	328	0.08%	\$492,364	0.08%
Condo	1,813	0.44%	\$2,637,583	0.43%
Correctional Facility	25	0.01%	\$35,106	0.01%
House/Duplex	232,772	56.91%	\$336,622,501	54.94%
Military Housing	895	0.22%	\$1,164,661	0.19%
Mobile Home	73,221	17.90%	\$130,081,325	21.23%
Other	28,680	7.01%	\$39,951,318	6.52%
Townhouse	9,917	2.42%	\$13,320,590	2.17%
Travel Trailer	2,686	0.66%	\$6,569,924	1.07%

Figure 14: Impacted Housing Types and Estimated Loss (Source: FEMA IA)⁴

In the 63 IA counties, residents of 73,221 mobile homes and 2,686 travel trailers applied for FEMA IHP assistance. Thus, mobile homes and travel trailers account for 18.6% of all 408,990 IA applications in the state. The top five counties with mobile homes and travel trailer applicants are listed below.

Mobile Homes and Trailers with FEMA IA Applications		
County	# Mobile Homes & Travel Trailers that Applied for IA	% of all applications
Coffee	5,054	1.24%
Richmond	4,317	1.05%
Lowndes	4,307	1.05%
Laurens	2,604	0.64%
Bulloch	2,491	0.61%

Figure 15: Mobile Homes and Travel Trailers with FEMA Applications (Source: FEMA IA)²

⁴ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Impacts to the Uninsured

DCA evaluated how these storms impacted households without insurance. For the purposes of this analysis, households inspected by FEMA and shown to have flood damage are considered to have been flooded, while all other inspected units with no flood damage are considered to have been impacted exclusively by wind. As of March 1, 2025, FEMA has completed 88,209 inspections on properties affected by Idalia, Debby, and Helene, with the majority (97.2%) of the impact being due to Wind Damage. See the table below.

Number of Households by Cause of Damage and Disaster						
Disaster	Flood Damage		Wind Damage		Grand Total	
	# of HH	% of GT	# of HH	% of GT	# of HH	% of GT
Idalia	223	0.3%	4,315	4.9%	4,538	5.1%
Debby	563	0.6%	3,609	4.1%	4,172	4.7%
Helene	1,682	1.9%	77,817	88.2%	79,499	90.1%
Total	2,468	2.8%	85,741	97.2%	88,209	100%

Figure 16: Households by Cause of Damage (Source: FEMA IA)⁵

39,642 of the 88,209 properties inspected by FEMA belong to homeowners with wind damage to their property, with more than half (51%) of those households without homeowners' insurance to assist with the cost of repairs. This is a significant burden on these households. See the table below.

Number of Households by Homeowners Insurance and Disaster						
Disaster	HO Insured		Not HO Insured		Total	
	# of HH	% of GT	# of HH	% of GT	# of HH	% of GT
Idalia	1,131	2.9%	941	2.4%	2,072	5.2%
Debby	714	1.8%	523	1.3%	1,237	3.1%
Helene	17,568	44.3%	18,765	47.3%	36,333	91.7%
Total	19,413	49.0%	20,229	51.0%	39,642	100%

Figure 17: Households with or without Homeowners Insurance (Source: FEMA IA)³

1,773 of the 88,209 properties inspected by FEMA belong to homeowners with flood damage to their property, with 90% of them without flood insurance to assist with the cost of repairs. See the table below.

⁵ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Number of Households by Flood Insurance and Disaster						
Disaster	Flood Insured		Not Flood Insured		Total	
	# of HH	% of GT	# of HH	% of GT	# of HH	% of GT
Idalia	5	0.3%	116	6.5%	121	6.8%
Debby	60	3.4%	374	21.1%	434	24.5%
Helene	109	6.2%	1,109	62.6%	1,218	68.7%
Total	174	9.8%	1,599	90.2%	1,773	100%

Figure 18: Households with or without Flood Insurance (Source: FEMA IA)⁶

Emergency Shelters, Interim, and Permanent Housing

The three disasters that hit Georgia in 2023 and 2024 displaced thousands of people in the state. Residents with damaged homes often sheltered with family, friends, or in a congregate shelter. In response to Hurricane Idalia, at least 9 all-purpose emergency shelters and 4 shelters for homeless individuals were opened, accounting for at least 1,300 overnight stays. For Tropical Storm Debby, at least 5 shelters were opened, totaling approximately 500 overnight stays. For Hurricane Helene, at least 11 all-purpose shelters and 10 shelters for the homeless were opened, totaling an estimated approximately 3,700 overnight stays.

Emergency Shelters for Residents Fleeing the 2023-2024 Hurricanes				
Shelters – minimum	Idalia	Debby	Helene	Total
All-purpose Shelters	9	5	11	25
Shelters for Homeless	4	n/a	10	14
Overnight Stays (appr.)	1,300	500	3,700	5,500

Figure 19: Emergency Shelters (Source: Red Cross and DCA)

⁶ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Transitional Housing/Homelessness

Every other year, the Georgia Balance of State Continuum of Care conducts a statewide Point in Time Count of unhoused individuals in Georgia. In 2022, 3,919 homeless individuals were unsheltered and 1,937 homeless individuals were sheltered, for a total of 5,856 homeless individuals. This marked a 40% increase from 2019, when the count was delayed due to the pandemic.

Transitional Housing and Homeless Individuals					
Point in Time Count – Number of Individuals per Year					
Housing Status	2013	2015	2017	2019	2022
Unsheltered	5,317	3,518	1,843	2,262	3,919
Sheltered	2,334	2,279	1,873	1,921	1,937
Total	7,651	5,797	3,716	4,183	5,856
Change from previous count (%)	-32%	-24%	-36%	13%	40%

Figure 20: Transitional Housing and Homeless Individuals (2013: 2022) (Source: DCA)⁷

FEMA IHP Applications Progress

The table below reflects a significant backlog of unprocessed FEMA applications. Also highlighted is whether the unprocessed applications are pending an inspection (Yes/No) for the Individuals and Households Program (IHP). For Tropical Storm Debby, 727 inspections have been completed but are still pending an IHP decision. Additionally, 540 applications related to Hurricane Idalia remain unprocessed, underscoring the extensive impact of Helene compared to Idalia and Debby. The sheer scale of Hurricane Helene has resulted in a much higher number of IHP applicants, emphasizing the critical need for timely FEMA assistance to support recovery efforts. As shown in the table below, almost 150,000 FEMA IHP applicants have yet to have their homes inspected or receive an eligibility decision. The volume of IHP applicants is crucial as it directly affects the speed and efficiency of disaster recovery, ensuring that affected individuals receive the necessary aid to rebuild their lives and homes.

⁷ <https://dca.georgia.gov/affordable-housing/homelessness-assistance/point-time-homeless-count/single-night-homeless>

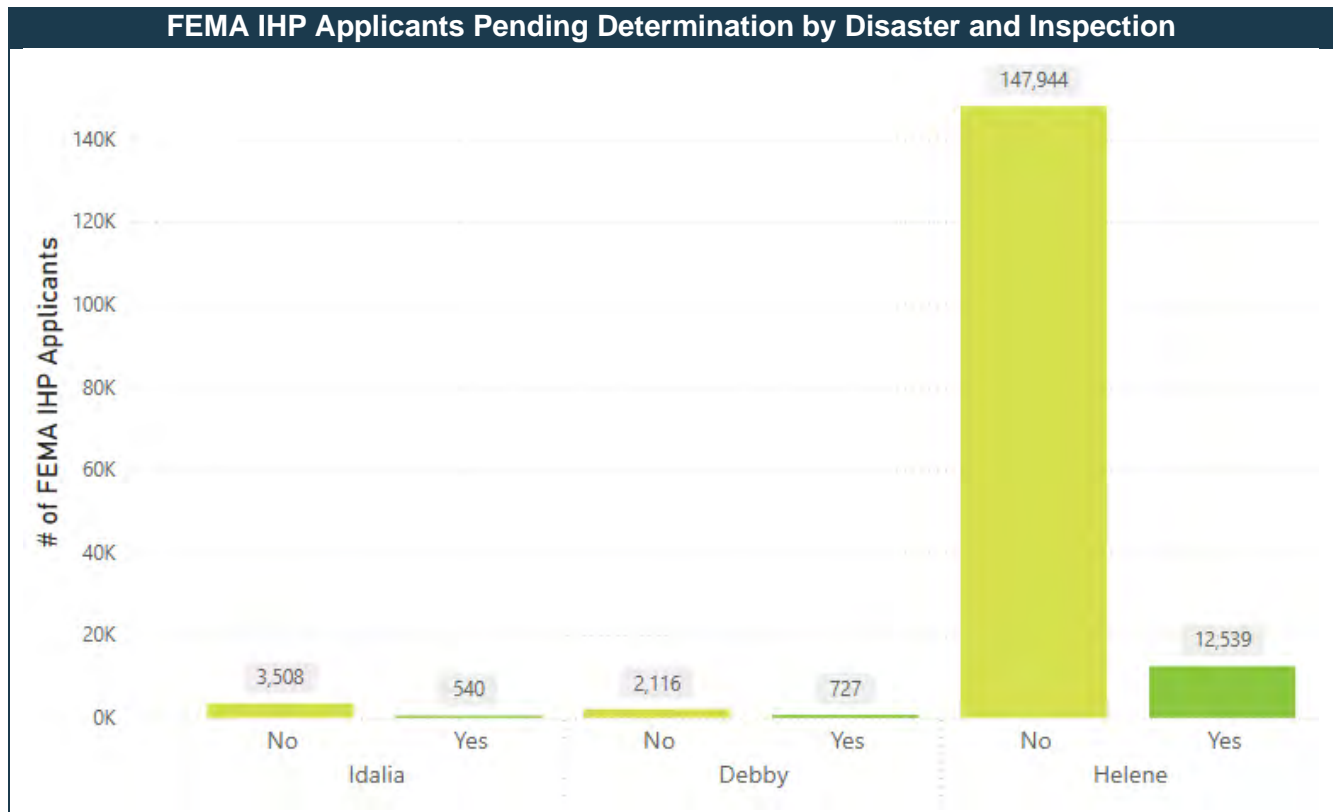


Figure 21: IHP Application Progress (Source: FEMA IA)⁸

The latest available data demonstrates that the two recent storms have a higher Other Needs Assistance (ONA) award than Housing Assistance (HA) award through the IHP, likely because ONA awards can be made prior to an IHP award determination. Hurricane Idalia occurred 11 months before Tropical Storm Debby and 13 months before Hurricane Helene. Thus, FEMA is further along in awarding IHP funds for that event. For Idalia, HA awards are currently 7.5 times the ONA amount. For Debby and Helene, ONA awards currently outpace HA. However, DCA anticipates that FEMA HA funds will increase significantly over time, more closely in line with Idalia’s HA/ONA ratio.

Households Requesting Assistance by Disaster				
Disaster Name	# of HH	Housing Assistance	Other Needs Assistance	Total Assistance
Idalia	9,992	\$4,438,065	\$588,441	\$5,026,506
Debby	7,353	\$3,909,025	\$4,818,058	\$8,727,083
Helene	391,645	\$79,709,795	\$232,948,170	\$312,657,965
Total	408,990	\$88,056,885	\$238,354,669	\$326,411,554

Figure 22: Households Requesting Assistance by Disaster (by Monetary Sum) (Source: FEMA IA)⁶

⁸ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Impact on LMI Households

The income data provided in the FEMA IHP dataset was not specific enough to perform a low-and moderate-income (LMI) calculation, as income was categorized by general ranges. To summarize the impact the storms had on households based on income, four income groupings are provided in the tables below. Overall, based on the available data, households with lower incomes were disproportionately impacted, with 45% of impacted households earning less than \$30,000 in gross income and almost 79% making less than \$60,000 below the state’s median income.

Number of Households by Gross Income & Occupancy Type										
Occupancy	Less Than \$30,000		\$30,001 - \$60,000		\$60,001 - \$120,000		Greater Than \$120,000		Grand Total	
	#	%GT	#	%GT	#	%GT	#	%GT	#	%GT
Owner	75,181	18.4%	79,621	19.5%	58,606	14.3%	9,684	2.4%	223,092	54.6%
Renter	108,845	26.6%	58,133	14.2%	18,147	4.4%	773	0.2%	185,898	45.5%
Total	184,026	45%	137,754	33.7%	76,753	18.8%	10,457	2.6%	408,990	100%

Figure 23: Gross Income by Household Type (Source: FEMA IA)⁹

Based on data from 2018-2022, 18 of the 20 HUD MID-designated counties are below the state median household income. Only one county of the state-identified MID counties is not below the state median household income.¹⁰ The table on the next page shows the median income for each MID-designated county.

⁹ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

¹⁰ <https://georgiadata.org/topics/economics/median-household-income>

Median Income for MID Counties	
HUD Declared MID County	Median Income (2018-2022)
Appling*	\$43,268
Atkinson*	\$43,268
Bacon*	\$43,938
Ben Hill**	\$38,255
Berrien*	\$48,670
Brooks**	\$42,263
Bryan*	\$90,627
Bulloch**	\$53,675
Burke*	\$50,321
Candler*	\$45,519
Chatham	\$66,171
Clinch*	\$53,350
Coffee*	\$48,398
Columbia*	\$92,571
Colquitt**	\$47,235
Cook**	\$46,706
Effingham**	\$79,474
Emanuel*	\$47,905
Evans**	\$55,222
Glynn**	\$65,970
Jeff Davis*	\$41,780
Jefferson**	\$46,865
Jenkins**	\$31,463
Johnson**	\$47,796
Lanier*	\$39,971
Laurens*	\$46,776
Liberty**	\$55,149
Lincoln**	\$50,754
Long**	\$56,819
Lowndes*	\$52,821
McDuffie*	\$54,752

Median Income for MID Counties	
HUD Declared MID County	Median Income (2018-2022)
Pierce**	\$54,861
Richmond*	\$50,605
Tattnall**	\$51,868
Telfair**	\$41,801
Tift**	\$52,561
Toombs*	\$47,315
Treutlen*	\$38,641
Screven**	\$49,941
Ware**	\$44,138
Washington**	\$43,810
Wayne**	\$49,847
Wheeler*	\$36,354
Wilkes**	\$51,780
State Median Income	\$71,355
*HUD Identified MID **State Identified MID	

Figure 24: MID County Median Income (Source: Georgia Data)¹⁰

Consistent with the Housing and Community Development Act of 1974 (HCDA), 24 CFR 570.484 and 24 CFR 570.200(a)(3), the Universal Notice requires grantees to comply with the overall benefit requirement that 70 percent of funds be utilized for activities that benefit LMI persons (III.B.1). The consideration and prioritization of LMI persons for assistance is important since the long-term effects of disaster and the cost of recovery can be compounded by pre-existing economic precarity. DCA affirms that the projects and programs proposed in this Action Plan aim to meet this national objective.

Through targeted aid to MID-declared counties, DCA will fulfill the National Objective of benefiting LMI persons with CDBG-DR funds across housing, infrastructure, and mitigation programs.

The map below shows the LMI status of the affected counties by block group.

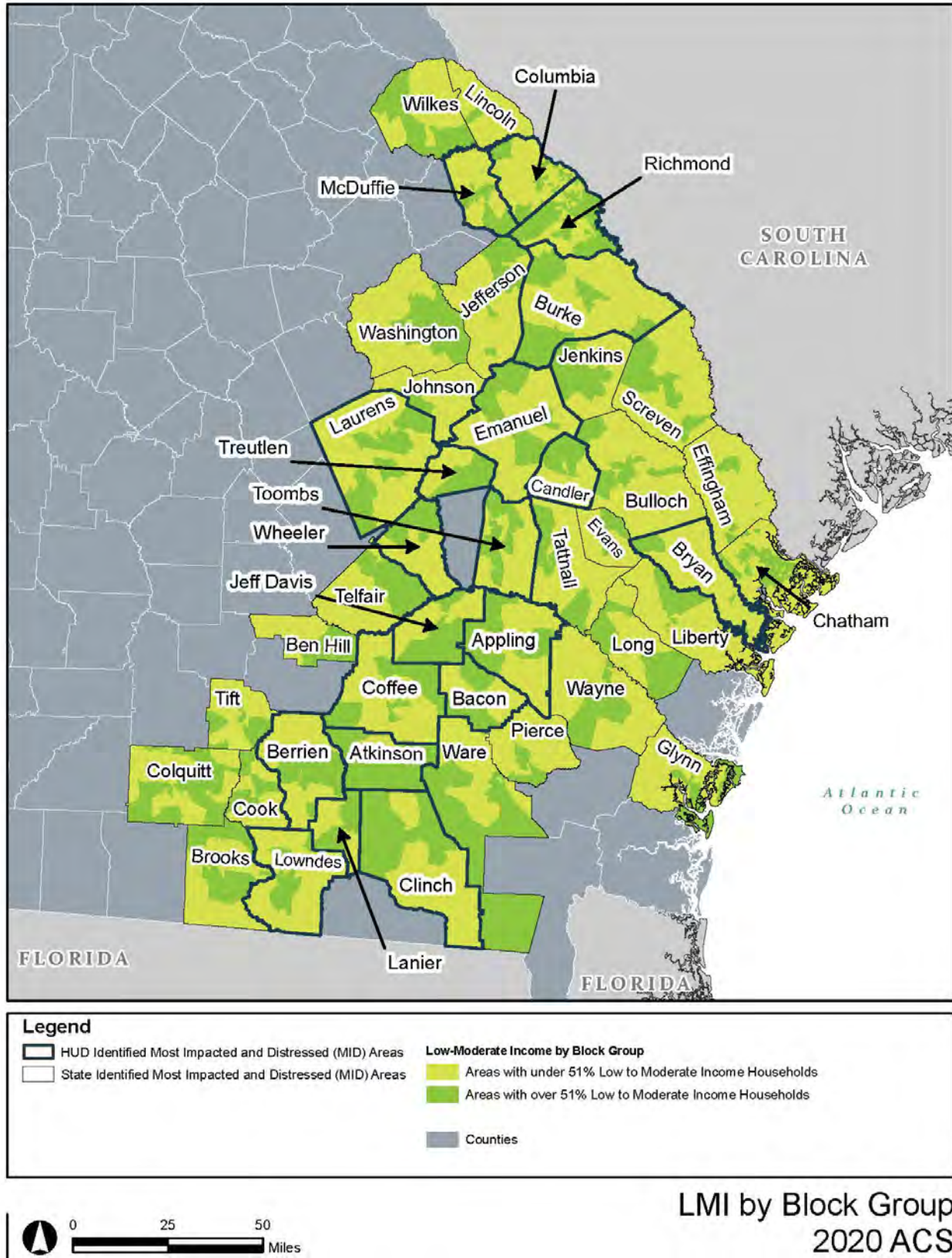


Figure 25: MID LMI Counties

Hurricanes Helene and Idalia and Tropical Storm Debby brought devastating impacts to many low to moderate income (LMI) households across Georgia. Most counties in Georgia have block groups where over half of the residents are low to moderate income, and recovery programs will implement a prioritization system to ensure that recovery efforts are fair and effective in focusing funds on the areas least able to recover with their existing resources.

In Jeff Davis County, for example, Hurricane Helene destroyed entire farms and left thousands without power. Many residents, already struggling with limited financial means, now face the daunting task of rebuilding their lives with minimal resources. Similar impacts were felt in Appling, Atkinson, and Burke counties, where low-income communities experienced significant wind and water damage to homes.

To address these challenges, programs will prioritize the reconstruction and rehabilitation of housing, particularly for low-income families. This includes programs for multifamily properties utilized as rentals and temporary housing, as well as home repairs to cover uninsured or underinsured property losses.

Rental and Owner-Occupied Single Family and Multifamily Housing

Housing Damage and Loss Assessment

For rental and owner-occupied single-family and multifamily housing, damages and losses were reviewed across four different categories:

1. FEMA IHP Applicants
2. SBA Housing Applicants
3. National Flood Insurance Program (NFIP) Claims
4. Public Housing Damages

These categories were evaluated separately and then combined to provide a total estimated housing loss. DCA then evaluated all the awards that have been disbursed to these households and subtracted that amount from the estimated loss to come up with a total unmet need.

FEMA IHP Applicants Loss Assessment

DCA reviewed FEMA's Individuals and Households Program - Valid Registrations¹¹ Dataset as of March 1, 2025, to estimate the total loss for households who applied for FEMA IA assistance.

¹¹ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

FEMA IHP Applicants Maximums

FEMA’s maximum assistance amounts under the Individuals and Households Program (IHP) are as follows:

FEMA Housing Assistance Maximums				
Housing Assistance (HA) max	Other Needs Assistance (ONA) max	Applicable	Applies to GA disaster	Federal Register Notice
\$41,000	\$41,000	10/1/2022	Idalia (decl. 9.7.23)	87 FR 64511
\$42,500	\$42,500	10/1/2023	Debby (decl. 9.24.24) Helene (decl. 9.30.24)	88 FR 72520
\$43,600	\$43,600	10/1/2024	N/A	89 FR 84923

Figure 26: FEMA Housing Assistance Maximums

HUD Damage Categories

HUD-identified damage categories for the hurricanes in 2023-2024 based on FEMA IHP data on housing unit damage as of November 20, 2024, and disasters occurring in 2023 and declared on or before November 1, 2024. Hurricane Helene occurred just over a month before the data was compiled to create the tables below, so the full scope of damages was likely not realized at the time of the assessment.

FEMA IHP Inspected HUD Categories - Homeowners			
Damage Category	Amount of FEMA Inspected Real Property Damage	Amount of Flooding on the 1 st Floor	Amount of FEMA Inspected Personal Property Damage
Minor-Low	<\$3,000		<\$2,500
Minor-High	\$3,000 to \$7,999		\$2,500 to \$3,499
Major-Low	\$8,000 to \$14,999	1 to 3.9 feet	\$3,500 to \$4,999
Major-High	\$15,000 to \$28,800	4 to 5.9 feet	\$5,000 to \$9,000
Severe	> \$28,800 or destroyed	6 or more feet	>\$9,000 or destroyed

Figure 27: FEMA IHP Inspected HUD Categories – Homeowners (Source: Federal Register)¹²

¹² [\[90 FR 4759\]](#)

FEMA IHP Inspected HUD Categories - Renters		
Damage Category	Amount of FEMA Inspected Personal Property Damage	Amount of Flooding on the 1 st Floor
Minor-Low	<\$1,000	
Minor-High	\$1,000 to \$1,999	
Major-Low	\$2,000 to \$3,499	1 to 3.9 feet
Major-High	\$3,500 to \$7,500	4 to 5.9 feet
Severe	> \$7,500 or destroyed	6 or more feet

Figure 28: FEMA IHP Inspected HUD Categories- Renters (Source: Federal Register)¹³

For each household determined to have a housing need, an estimated loss multiplier was calculated using the average IHP awarded amount for homeowners, HUD guidance in the Federal Register, and FEMA IHP maximums within the three categories below.

1. HUD Damage Category Application of Minor-Low to Minor-High
2. HUD Damage Category Application of Major-Low to Severe
3. FEMA IHP Applications without FEMA Verified Loss (No FVL)

The calculations for these 3 categories are separated by homeowners and renters and then totaled by disaster to help identify the needs of each category as well as show the total impact of each disaster.

Impacted Homeowners

The information in the tables below outlines the total population of owner-occupied disaster-damaged properties with FEMA-documented damages caused by Idalia, Debby, and Helene. Helene represents a significant amount of damage, with almost 93% of the damage accruing during Helene.

Owner-Occupied Damaged Properties by Damage Categories and Disaster								
Damage Category	Idalia		Debby		Helene		Total	
	# of Owners	%	# of Owners	%	# of Owners	%	# of Owners	%
Minor-Low	688	2.1%	731	2.2%	15,730	47.5%	17,149	51.8%
Minor-High	434	1.3%	356	1.1%	13,897	42.0%	14,687	44.4%
Major-Low	3	0.0%	21	0.1%	41	0.1%	65	0.2%
Major-High	13	0.0%	93	0.3%	698	2.1%	804	2.4%
Severe	9	0.0%	20	0.1%	355	1.1%	384	1.2%
Total	1,147	3.5%	1,221	3.7%	30,721	92.8%	33,089	100%

Figure 29: Owner-Occupied Damaged Properties by Damage Categories and Disaster 2023-2024 (Source: FEMA IA)¹⁴

¹³ [90 FR 4759]

¹⁴ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Homeowners - Damage Category Loss Multiplier Calculation - Minor-Low & Minor-High

For FEMA IHP applications that are owner-occupied housing within the minor-low and minor-high damage categories, the count of applications was divided by the overall IHP awarded amount per damage category and rounded up to the nearest whole dollar value. The average IHP award amount below will be used to estimate the total loss for these two damage categories for homeowners and renters.

Owner-Occupied Average IHP Award Amount by Damage Categories			
Damage Category	# of Owners	Total IHP Awarded Amount	Average IHP Award Amount
Minor-Low	17,149	\$31,618,187	\$1,844
Minor-High	14,687	\$83,539,631	\$5,688

Figure 30: Owner-Occupied Average IHP Award Amount by Damage Categories 2023-2024 (Source: FEMA IA)¹⁵

Homeowners - Damage Category Loss Multiplier Calculation - Major-Low, Major-High, & Severe

For FEMA IHP applications for owner-occupied housing within the Major-Low, Major-High, and Severe damage categories, the loss multiplier was provided by HUD in the January 13, 2025, Federal Register Notice [90 FR 1754]. Since the types of damages varied for the 2023-2024 Hurricanes between floods, severe storms, hurricanes, and tornadoes, the average of those 4 categories was used as the estimated loss multiplier. The notice also identified different values for the mobile home residency type compared to all other residency types. See the table below for the values used to estimate the total loss for these three damage categories for homeowners.

Owner-Occupied Loss Multiplier – Major-Low, Major-High & Severe		
Damage Category	Non-Mobile Home Loss Multiplier	Mobile Home Loss Multiplier
Major-Low	\$39,952	\$77,058
Major-High	\$55,922	\$98,463
Severe	\$70,567	\$134,834

Figure 31: Owner-Occupied Loss Multiplier: Major-Low, Major-High, & Severe 2023-2024 (Source: Federal Register)¹⁶

Impacted Renters

The information in the tables below outlines the total population of renter-occupied disaster-damaged properties with FEMA documented damage caused by Idalia, Debby, and Helene. Helene represents a significant amount of damage, with over 92% of the damages accruing during Helene.

¹⁵ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

¹⁶ [90 FR 4759]

Renter-Occupied Damaged Properties by Damage Categories and Disaster								
Damage Category	Idalia		Debby		Helene		Total	
	# of Renters	%	# of Renters	%	# of Renters	%	# of Renters	%
Minor-Low	251	0.9%	1030	3.8%	14,745	54.1%	16,026	58.8%
Minor-High	380	1.4%	276	1.0%	8,976	33.0%	9,632	35.4%
Major-Low	55	0.2%	33	0.1%	895	3.3%	983	3.6%
Major-High	16	0.1%	33	0.1%	367	1.4%	416	1.5%
Severe	4	0.0%	10	0.0%	171	0.6%	185	0.7%
Total	706	2.6%	1,382	5.1%	25,154	92.4%	27,242	100%

Figure 32: Renter-Occupied Damaged Properties by Damage Categories and Disaster (Source: FEMA IA)¹⁷

Renters - Damage Category Loss Multiplier Calculation - Minor-Low & Minor-High

For FEMA IA Applications with damage categories of Minor-Low and Minor-High, the same loss multiplier is used for Renter-Occupied damaged properties as Owner-Occupied damaged properties. See the table above for the average IHP award amount.

Renters - Damage Category Loss Multiplier Calculation - Major-Low, Major-High & Severe

For FEMA IA applications for renter-occupied housing with damage categories of Major-Low, Major-High, and Severe, the loss multiplier is the lesser of the maximum HA award amount or the average of the loss multipliers provided in the Federal Register [90 FR 1754]. The maximum HA award amount was different in 2023 and 2024; see Figure 26 on page 29. The Federal Register guidance identified different values for the mobile home residency type compared to all other residency types.

Renter-Occupied Loss Multiplier – Major-Low, Major-High & Severe				
Damage Category	Idalia		Debby & Helene	
	Non - Mobile Home	Mobile Home	Non - Mobile Home	Mobile Home
Major-Low	\$39,952	\$41,000	\$39,952	\$42,500
Major-High	\$41,000	\$41,000	\$42,500	\$42,500
Severe	\$41,000	\$41,000	\$42,500	\$42,500

Figure 33: Renter-Occupied Loss Multiplier – Major-Low, Major-High & Severe

Impact on Homeowners & Renters

The information in the following tables outlines the total population of damaged properties with FEMA-documented damages caused by Idalia, Debby, and Helene. To account for households with No FEMA Verified Loss, DCA has classified these households as “No FVL.” A detailed description is provided in the *No FEMA Verified Loss Table* on page 37.

¹⁷ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Owner-Occupied Vs. Renter-Occupied Households

The split between owner and renter household impacts was close, with homeowners experiencing slightly more impacts from these hurricanes than renters. The tables below show that the cost to repair the damage to rental housing is higher than the estimated cost to repair owner-occupied housing. Renters accounted for about 45% of households affected by the 2023-2024 Hurricanes, which is greater than the 36% they represent in the region. Homeowners accounted for about 55% of households affected by the 2023-2024 Hurricanes, which is less than the 64% they represent in the region.

The pie chart below shows the ratio by occupancy type for the IA counties. The table below shows the ratio of occupancy type by damage category.

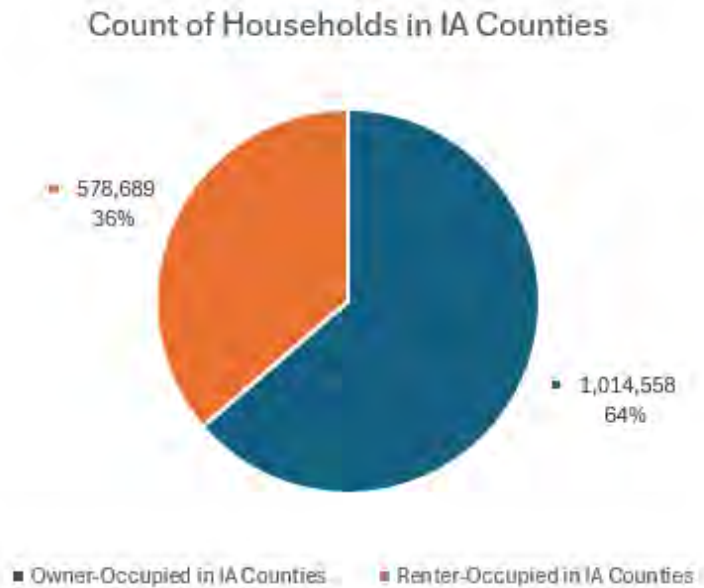


Figure 34: Owner to Renter Household Ratio in IA Counties (Source: 2023: ACS 5-Year: DP04)

Owner vs. Renter Occupancy Ratio by Damage Category 2023-2024 Hurricanes						
Damage Category	Owner		Renter		Total	
	# of HH	%	# of HH	%	# of HH	%
No FVL	190,003	46.5%	158,656	38.8%	348,659	85.3%
Minor-Low	17,149	4.2%	16,026	3.9%	33,175	8.1%
Minor-High	14,687	3.6%	9,632	2.4%	24,319	6.0%
Major-Low	65	0.0%	983	0.2%	1,048	0.3%
Major-High	804	0.2%	416	0.1%	1,220	0.3%
Severe	384	0.1%	185	0.1%	569	0.1%
Total	223,092	54.6%	185,898	45.5%	408,990	100%

Figure 35: Owner to Renter Occupancy Ratio by Damage Category (Source: FEMA IA)¹⁸

¹⁸ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Homeowners & Renters - Mobile Homes and Non-Mobile Homes Impacts

The information in the tables below outlines the total damaged mobile home and non-mobile home households with FEMA-documented damage caused by Idalia, Debby, and Helene. Mobile homes represent almost 18% of the residency types with FEMA documented damage from these disasters, and they were twice as likely to have a FEMA Verified Loss than all other residency types. The Federal Register also identified mobile homes as a special category for the loss multiplier.

Count Mobile Home IA Applicants by Damage Category						
Damage Category	Non-Mobile Home		Mobile Home		Total	
	# of HH	%	# of HH	%	# of HH	%
No FVL	293,588	71.8%	55,071	13.5%	348,659	85.3%
Minor-Low	24,476	6.0%	8,699	2.1%	33,175	8.1%
Minor-High	15,795	3.9%	8,524	2.1%	24,319	5.9%
Major-Low	824	0.2%	224	0.1%	1,048	0.3%
Major-High	812	0.2%	408	0.1%	1,220	0.3%
Severe	274	0.1%	295	0.1%	569	0.1%
Total	335,769	82.1%	73,221	17.9%	408,990	100%

Figure 36: Mobile Home IA Applicants by Damage Category (Source: FEMA IA)¹⁹

FEMA IHP Estimated Loss Calculations

To estimate the total loss within FEMA IHP applicants, DCA multiplied the loss multipliers identified above by the number of applicants in each HUD-identified damage category. This method was used instead of the median damage estimate for the SBA properties due to the lack of access to SBA applicant data.

Homeowners & Renters - Estimated Loss Calculations - Minor-Low and Minor-High

For FEMA IA Applications within the Minor-Low and Minor-High damage categories, the count of those applications was multiplied by the overall average of the FEMA IHP Award Amount to determine the estimated total loss for these two damage categories. The tables below outline the total number of FEMA IHP applicants (divided by homeowner, renter, and combined) with Minor-Low and Minor-High damage and provide the total estimated loss for each damage category.

Minor-Low and Minor-High Estimated Total Loss – Homeowners			
Damage Category	# of Owners	Average IHP Award Amount	Estimated Loss
Minor-Low	17,149	\$1,844	\$31,622,756
Minor-High	14,687	\$5,688	\$83,539,656
Total	31,836	N/A	\$115,162,412

Figure 37: Minor-Low and Minor-High Estimated Total Loss for Homeowners (Source: FEMA IA)¹⁸

¹⁹ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Minor-Low and Minor-High Estimated Total Loss – Renters			
Damage Category	# of Renters	Average IHP Award Amount	Estimated Loss
Minor-Low	16,026	\$1,844	\$29,551,944
Minor-High	9,632	\$5,688	\$54,786,816
Total	25,658	N/A	\$84,338,760

Figure 38: Minor-Low and Minor-High Estimated Total Loss for Renters (Source: FEMA IA)²⁰

Minor-Low and Minor-High Estimated Total Loss – Homeowners & Renters			
Damage Category	# of HH	Average IHP Award Amount	Estimated Loss
Minor-Low	33,175	\$1,844	\$61,174,700
Minor-High	24,319	\$5,688	\$138,326,472
Total	57,494	N/A	\$199,501,172

Figure 39: Minor-Low and Minor-High Estimated Total Loss: Combined (Source: FEMA IA)¹⁹

Homeowners & Renters - Estimated Loss Calculations - Major-Low, Major-High and Severe

For FEMA IA Applications with Major-Low to Severe damage, the loss multiplier was provided in the January 13, 2025, Federal Register Notice [90 FR 1754]²⁰. Since the types of damages varied for the 2023-2024 Hurricanes between floods, severe storms, hurricanes, and tornadoes, the average of those 4 categories was used as the estimated loss multiplier. The notice identified different values for the mobile home residency type compared to all other residency types. For renters, the loss multiplier is the lesser of the HA max award or the loss multiplier provided in the Federal Register. See the tables below.

Major-Low to Severe Estimated Total Loss – Homeowners							
Damage Category	Non-Mobile Home			Mobile Home			Total Estimated Loss
	# of Owners	Loss Multiplier	Estimated Loss	# of Owners	Loss Multiplier	Estimated Loss	
Major-Low	60	\$39,952	\$2,397,120	5	\$77,058	\$385,290	\$2,782,410
Major-High	491	\$55,922	\$27,457,702	313	\$98,463	\$30,818,919	\$58,276,621
Severe	172	\$70,567	\$12,137,524	212	\$134,834	\$28,584,808	\$40,722,332
Total	723	N/A	\$39,888,678	530	N/A	\$59,789,017	\$99,677,695

Figure 40: Major-Low to Severe Estimated Total Loss for Homeowners (Source: FEMA IA & Federal Register)^{19 21}

²⁰ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

²¹ [90 FR 4759]

Major-Low to Severe Estimated Total Loss – 2023 Disaster – Renters							
Idalia							
Damage Category	Non-Mobile Home			Mobile Home			Total Estimated Loss
	# of Owners	Loss Multiplier	Estimated Loss	# of Owners	Loss Multiplier	Estimated Loss	
Major-Low	52	\$39,952	\$2,077,504	3	\$41,000	\$123,000	\$2,200,504
Major-High	14	\$41,000	\$574,000	2	\$41,000	\$82,000	\$656,000
Severe	3	\$41,000	\$123,000	1	\$41,000	\$41,000	\$164,000
Total	69	N/A	\$2,774,504	6	N/A	\$246,000	\$3,020,504

Figure 41: Major-Low to Severe Estimated Loss for Renters: 2023 (Source: FEMA IA & Federal Register)^{22 23}

Major-Low to Severe Estimated Total Loss – 2024 Hurricanes – Renters							
Debby & Helene							
Damage Category	Non-Mobile Home			Mobile Home			Total Estimated Loss
	# of Owners	Loss Multiplier	Estimated Loss	# of Owners	Loss Multiplier	Estimated Loss	
Major-Low	712	\$39,952	\$28,445,824	216	\$42,500	\$9,180,000	\$37,625,824
Major-High	307	\$42,500	\$13,047,500	93	\$42,500	\$3,952,500	\$17,000,000
Severe	99	\$42,500	\$4,207,500	82	\$42,500	\$3,485,000	\$7,692,500
Total	1,118	N/A	\$45,700,824	391	N/A	\$16,617,500	\$62,318,324

Figure 42: Major-Low to Severe Estimated Total Loss for Renters: 2024 (Source: FEMA IA & Federal Register)^{21 24}

Major-Low to Severe Estimated Total Loss – Homeowners & Renters						
Damage Category	Non-Mobile Home		Mobile Home		Total	
	# of HH	Estimated Loss	# of HH	Estimated Loss	# of HH	Estimated Loss
Major-Low	824	\$32,920,448	224	\$9,688,290	1048	\$42,608,738
Major-High	812	\$41,079,202	408	\$34,853,419	1220	\$75,932,621
Severe	274	\$16,468,024	295	\$32,110,808	569	\$48,578,832
Total	1,910	\$90,467,674	927	\$76,652,517	2,837	\$167,120,191

Figure 43: Major-Low to Severe Estimated Total Loss: Combined (Source: FEMA IA)²¹

Homeowners & Renters - Estimated Loss Calculations - No FEMA Verified Loss

FEMA IA applicants who applied for assistance and have no real property or personal property damages allocated but have not received an inspection are categorized as “NO FVL With No

²² (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

²³ [87 FR 64511] - <https://www.federalregister.gov/documents/2022/10/25/2022-23162/notice-of-maximum-amount-of-assistance-under-the-individuals-and-households-program>

²⁴ [88 FR 72520] - <https://www.federalregister.gov/documents/2023/10/20/2023-23168/notice-of-maximum-amount-of-assistance-under-the-individuals-and-households-program>

Inspection.” Without an inspection of the property confirming there was no real property or personal property damage, DCA used the Minor-Low multiplier to estimate the total loss. FEMA IA applicants who applied for assistance and have no real property or personal property damages allocated and had an inspection are categorized as “NO FVL with Inspection.” Since FEMA physically inspected these properties and found no damage, the multiplier for these applicants is \$0. See the table below.

No FEMA Verified Loss Estimated Loss						
Damage Category	Owner			Renter		
	# of Owners	Loss Multiplier	Estimated Loss	# of Renters	Loss Multiplier	Estimated Loss
NO FVL with No Inspection	181,333	\$1,844	\$334,378,052	138,756	\$1,844	255,866,064
NO FVL with Inspection	8,670	\$0	\$0	19,900	\$0	\$0
Total	190,003	N/A	\$334,378,052	158,656	N/A	\$255,866,064

Figure 44: No FVL Estimated Loss: Homeowner and Renter (Source: FEMA IA)²⁵

2023-2024 Hurricanes – Estimated Loss

The information in the tables below outlines the Estimated Loss caused by Idalia, Debby, and Helene. To account for households with No FEMA Verified Loss, the state has classified these households as “No FVL.” No FVL households were only allocated a loss if no FEMA inspection occurred at the time the data was received.

Owner-Occupied Estimated Loss by Damage Categories and Disaster								
Damage Category	Idalia		Debby		Helene		Total	
	Estimated Loss	%	Estimated Loss	%	Estimated Loss	%	Estimated Loss	%
No FVL	\$5,360,508	1.0%	\$2,185,140	0.4%	\$326,832,404	59.3%	\$334,378,052	60.7%
Minor-Low	\$1,268,672	0.2%	\$1,347,964	0.2%	\$29,006,120	5.3%	\$31,622,756	5.7%
Minor-High	\$2,468,592	0.5%	\$2,024,928	0.4%	\$79,046,136	14.3%	\$83,539,656	15.2%
Major-Low	\$119,856	0.0%	\$838,992	0.2%	\$1,823,562	0.3%	\$2,782,410	0.5%
Major-High	\$769,527	0.1%	\$6,136,648	1.1%	\$51,370,446	9.3%	\$58,276,621	10.6%
Severe	\$956,438	0.2%	\$1,861,209	0.3%	\$37,904,685	6.9%	\$40,722,332	7.4%
Total	\$10,943,593	2.0%	\$14,394,881	2.6%	\$525,983,353	95.4%	\$551,321,827	100%

Figure 45: Owner-Occupied Estimated Loss by Damage Category and Disaster

²⁵ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

Renter-Occupied Estimated Loss by Damage Categories and Disaster								
Damage Category	Idalia		Debby		Helene		Total	
	Estimated Loss	%	Estimated Loss	%	Estimated Loss	%	Estimated Loss	%
No FVL	\$4,696,668	1.2%	\$3,651,120	0.9%	\$247,518,276	61.0%	\$255,866,064	63.1%
Minor-Low	\$462,844	0.1%	\$1,899,320	0.5%	\$27,189,780	6.7%	\$29,551,944	7.3%
Minor-High	\$2,161,440	0.5%	\$1,569,888	0.4%	\$51,055,488	12.6%	\$54,786,816	13.5%
Major-Low	\$2,200,504	0.5%	\$1,333,704	0.3%	\$36,292,120	9.0%	\$39,826,328	9.8%
Major-High	\$656,000	0.2%	\$1,402,500	0.4%	\$15,597,500	3.9%	\$17,656,000	4.4%
Severe	\$164,000	0.0%	\$425,000	0.1%	\$7,267,500	1.8%	\$7,856,500	1.9%
Total	10,341,456	2.5%	\$10,281,532	2.5%	\$384,920,664	94.9%	\$405,543,652	100%

Figure 46: Renter-Occupied Estimated Loss by Damage Category and Disaster

Owner & Renter-Occupied Estimated Loss by Damage Categories and Disaster								
Damage Category	Idalia		Debby		Helene		Grand Total	
	Estimated Loss	% GT	Estimated Loss	% GT	Estimated Loss	% GT	Estimated Loss	%
No FVL	\$10,057,176	1.1%	\$5,836,260	0.6%	\$574,350,680	60.0%	\$590,244,116	61.7%
Minor-Low	\$1,731,516	0.2%	\$3,247,284	0.3%	\$56,195,900	5.9%	\$61,174,700	6.4%
Minor-High	\$4,630,032	0.5%	\$3,594,816	0.4%	\$130,101,624	13.6%	\$138,326,472	14.5%
Major-Low	\$2,320,360	0.2%	\$2,172,696	0.2%	\$38,115,682	4.0%	\$42,608,738	4.5%
Major-High	\$1,425,527	0.2%	\$7,539,148	0.8%	\$66,967,946	7.0%	\$75,932,621	7.9%
Severe	\$1,120,438	0.1%	\$2,286,209	0.2%	\$45,172,185	4.7%	\$48,578,832	5.1%
Total	\$21,285,049	2.2%	\$24,676,413	2.6%	\$910,904,017	95.2%	\$956,865,479	100%

Figure 47: Estimated Loss by Damage Category and Disaster: Combined

Small Business Administration (SBA) Home Loans

U.S. Small Business Administration (SBA) Disaster Home Loans are a form of federal disaster assistance for homeowners with good credit and income whose private property sustained damage that is not fully covered by FEMA or insurance. Homeowners whose property was damaged by a presidentially declared disaster are eligible to apply for an SBA long-term low-interest loan. Qualified homeowners may borrow up to \$500,000 to replace or repair their primary residence. Qualified renters and homeowners may borrow up to \$100,000 to replace or repair personal property such as clothing, furniture, cars, and appliances that were damaged or destroyed in a disaster.

SBA Home Loans - Loss Multiplier Calculation - 2023-2024 Hurricanes

As of the most recent SBA data update on February 23, 2025, the SBA has received 10,120 SBA home loan applications from disaster survivors from Idalia, Debby, and Helene. Of the 10,120 applicants who applied for an SBA loan, 2,097 applicants have received an offer from the SBA, and 1,751 of the applicants who received an offer have received a disbursement from the SBA. The average amount

offered for SBA disaster home loans, as of February 23, 2025, was \$55,448 based on the number of applicants that received an offer, and the amount offered (See Table Below).

Average Offered SBA Home Loan Amount		
# of Offers	Total Amount Offered	Average Offer Amount
2,097	\$116,274,900	\$55,448

Figure 48: Average SBA Loan Amounts (Source: SBA)²⁵

SBA Home Loans – Unmet Need Population Calculation - 2023-2024 Hurricanes

Applicants applying for a disaster SBA loan must qualify based on credit history, income, and other requirements, which may vary depending on the loan amount and if the applicant received a disaster SBA loan in the past. For physical damage loans over \$50,000, the SBA requires collateral. Some households may feel uncomfortable with this requirement and withdraw their application, though they truly need the assistance to make their home habitable. Applicants who did not comply with the terms of a previous SBA loan may also be considered ineligible. This includes borrowers who did not maintain flood and/or hazard insurance on previous SBA loans. Due to these barriers to receiving a disaster SBA home loan, along with the limited time since Debby and Helene, 8,369 disaster survivors who applied for a loan have not received a disbursement from the SBA.

Applicants Remaining without an SBA Home Loan		
# of Applicants	# Receiving a Disbursement	# with No Disbursement
10,120	1,751	8,369

Figure 49: Remaining Applications with SBA Home Loans by Number (Source: SBA)²⁵

SBA Home Loans – Estimated Unmet Need Calculation - 2023-2024 Hurricanes

To better estimate the total unmet need due to the 2023-2024 Hurricanes, DCA used the average offer amount for disaster SBA loans as the loss multiplier for all applicants who have not received a disbursement from the SBA.

Applicants Remaining without an SBA Loan		
# with No Disbursement	Average Offer Amount	SBA Unmet Need
8,369	\$55,448	\$464,046,084

Figure 50: Applications Remaining with SBA Home Loans by Dollar Amount (Source: SBA)²⁵

National Flood Insurance Program (NFIP) Coverage

NFIP is a national flood insurance program managed by FEMA that assists homeowners who live in areas that are vulnerable to flooding. It was created to help communities recover from disasters. Households that are insured with flood insurance can file a claim for assistance with repairing or replacing their home after a disaster.

NFIP – Loss Claims - 2023-2024 Hurricanes

The tables below show the damage caused due to flooding based on claims submitted to the NFIP. Though most of the claims were received from households within a high-risk flood zone (A, AE, AO), 222 households filed a claim that was within a low-risk flood zone (X). Majority of the households in low-risk zones were impacted by Debby, 123 of 222 homes, as shown in the table below. Debby was mainly a heavy rain event, which caused many riverbanks and dams to be breached.

Flood Claims by Disaster and Flood Zone (Number of Claims)						
Flood Event	Low-Risk – X Flood Zone		High-Risk - Flood Zones		Total	
	# of HH	% of GT	# of HH	% of GT	# of HH	% of GT
Idalia	19	2.0%	26	2.7%	45	4.7%
Debby	123	12.7%	199	20.6%	322	33.3%
Helene	80	8.3%	519	53.7%	599	62.0%
Total	222	23.0%	744	77.0%	966	100%

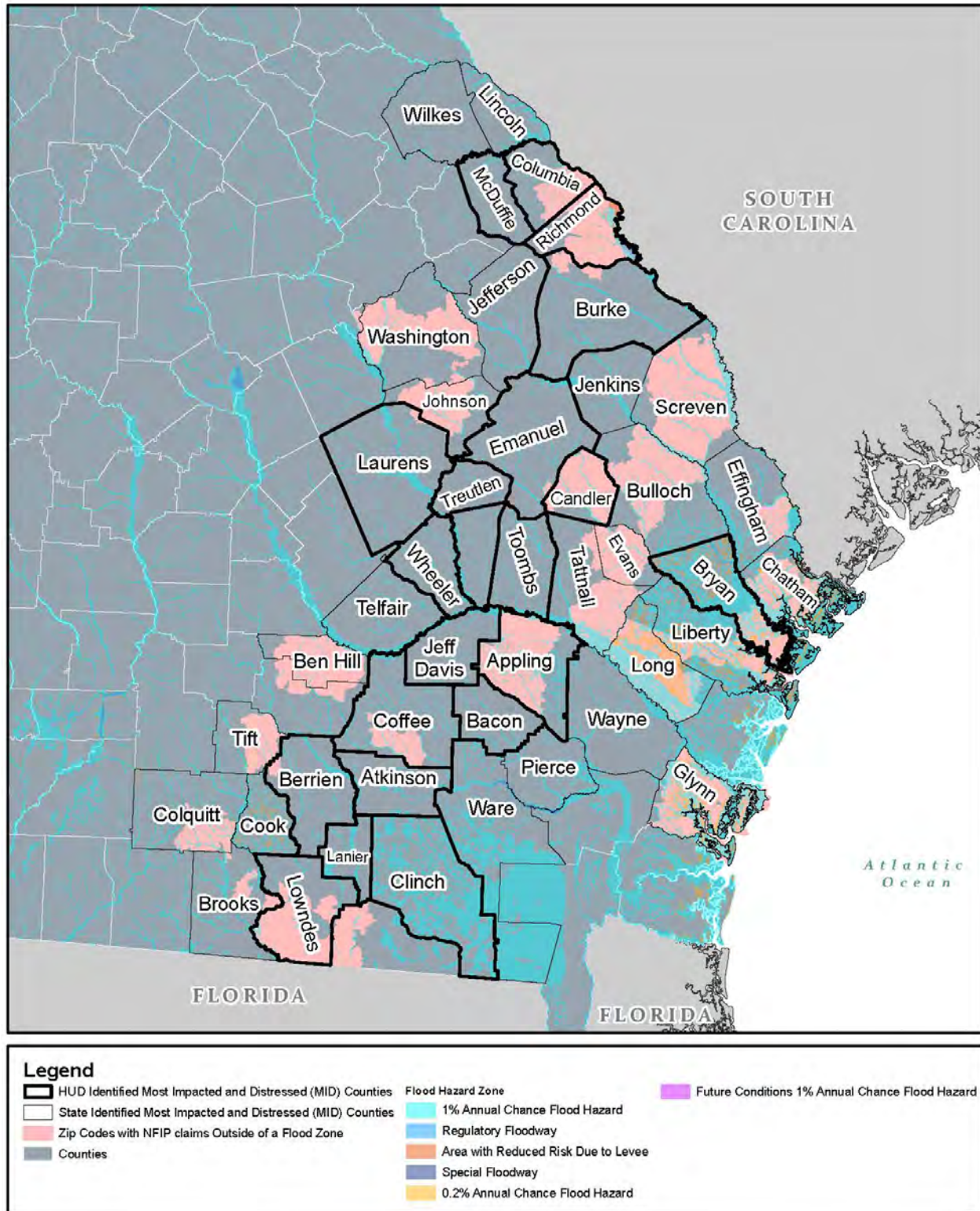
Figure 51: Flood Claims by Disaster and Flood Zone (Source: FIMA NFIP)²⁶

Flood Claims by Disaster and Flood Zone (Dollar Amount)						
Flood Event	Low-Risk - X Flood Zone		High-Risk - A, AE, AO Flood Zones		Total	
	Damage \$	% of GT	Damage \$	% of GT	Damage \$	% of GT
Idalia	\$753,987	3.1%	\$1,079,030	4.5%	\$1,833,017	7.6%
Debby	\$1,382,129	5.8%	\$5,840,640	24.3%	\$7,222,769	30.1%
Helene	\$848,624	3.5%	\$14,125,241	58.8%	\$14,973,865	62.3%
Total	\$2,984,740	12.4%	\$21,044,911	87.6%	\$24,029,651	100%

Figure 52: Flood Claims by Disaster and Flood Zone (Dollar Amount) (Source: FIMA NFIP)²⁶

There are instances of NFIP claims outside of the flood zones, however; private insurance data is not available for review at present. The map below reflects the flood hazard zones of the affected areas as well as NFIP flood claims in low-risk flood zones by zip code. Many of the zip codes highlighted below include areas within and outside of the flood zone. The map is meant to be illustrative of the incidents of flooding outside designated flood zones, but data was not available on a granular enough scale to show the individual claims.

²⁶ (3/2/25) - <https://www.fema.gov/openfema-data-page/fima-nfip-redacted-claims-v2>



0 25 50 Miles **NFIP Claims Outside of Flood Zones**

Figure 53: NFIP Claims and Flood Zones Map

Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

At the time of this Action Plan, DCA has only received a response from GHARRP from a call for public housing data. DCA will continue to collaborate with additional housing partners throughout the public comment process to ensure that additional data is collected and reflected in this Action Plan.

The Georgia Housing Authorities Risk Retention Pool (GHARRP) is a member-owned consortium that is committed to delivering secure and cost-effective property and casualty coverage to Georgia's Housing Authorities. During a period when coverage options were scant for housing authorities, GHARRP emerged as a strategic ally, harnessing collective purchasing power to devise an enhanced coverage program. GHARRP represents between 115-120 of Georgia's 180 Public Housing Authorities (PHAs). Following Hurricane Helene, GHARRP inspected over 1,400 properties in the 33 affected Housing Authorities. The current estimated damage for the pool is \$9.4 million. GHARRP anticipates that after insurance and payouts, premiums will increase for PHA members.

Public Housing Damages	
GHARRP - Property Damage	Total
Loss Amount	\$9,444,494

Figure 54: Public Housing Damages (Source: GHARRP)²⁷

The table below shows the top 5 most impacted counties among the 33 housing authorities assessed for damages by GHARRP.

Top 5 Counties with PHA Damage		
County	Housing Authority	Total Incurred
Lowndes	Valdosta Housing Authority	\$1,900,000
Coffee	Douglas Housing Authority	\$1,600,000
Richmond	Augusta Housing Authority	\$1,500,000
Ben Hill	Fitzgerald Housing Authority	\$1,200,000
Toombs	Lyons Housing Authority	\$750,000

Figure 55: Top 5 Counties with PHA Damage (Source: GHARRP)²⁷

Assistance Provided to Households Affected by 2023-2024 Hurricanes

The information in the tables below outlines the funds that have been awarded to households affected by Idalia, Debby, and Helene. These funds are the best available data DCA has been able to compile from FEMA, SBA, NFIP, and Public Housing.

FEMA IHP Assistance

The FEMA Individuals and Households Program (IHP) is designed to provide assistance to individuals and families affected by a major disaster. IHP is meant to be supplemental assistance to help those with necessary expenses and serious needs that are not covered by insurance or other sources. IHP offers various forms of assistance such as rental assistance, home repair assistance, home replacement assistance, lodging expense reimbursement, and other needs assistance for things like

²⁷ (2/28/25) - Georgia Housing Authorities Risk Retention Pool, Helene Damage Report

appliances, furniture, clothing, etc. The assistance FEMA is able to provide has a cap on the total amount eligible per household. (See Figure 26 on page 29) The tables below will show the amount awarded to disaster survivors of Idalia, Debby, and Helene. FEMA IA applicants with No FVL can receive assistance with emergency funds and lodging reimbursement without being approved for FEMA assistance.

IHP Assisted Households (Number)								
Damage Category	Idalia		Debby		Helene		Total	
	# of HH	%	# of HH	%	# of HH	%	# of HH	%
No FVL	8,139	2.0%	4,750	1.2%	335,770	82.1%	348,659	85.3%
Minor-Low	939	0.2%	1,761	0.4%	30,475	7.5%	33,175	8.1%
Minor-High	814	0.2%	632	0.2%	22,873	5.6%	24,319	5.9%
Major-Low	58	0.0%	54	0.0%	936	0.2%	1,048	0.3%
Major-High	29	0.0%	126	0.0%	1,065	0.3%	1,220	0.3%
Severe	13	0.0%	30	0.0%	526	0.1%	569	0.1%
Total	9,992	2.4%	7,353	1.8%	391,645	95.8%	408,990	100%

Figure 56: IHP Assisted Households by Damage Category and Disaster (Number) (Source: FEMA IA)²⁸

IHP Assisted Households (Dollar Amount)								
Damage Category	Idalia		Debby		Helene		Total	
	Award Amount	% of GT	Award Amount	% of GT	Award Amount	% of GT	Award Amount	% of GT
No FVL	\$88,725	0.0%	\$156,988	0.1%	\$137,278,789	42.1%	\$137,524,502	42.1%
Minor-Low	\$1,281,273	0.4%	\$2,398,721	0.7%	\$43,291,936	13.3%	\$46,971,929	14.4%
Minor-High	\$2,780,456	0.9%	\$3,344,474	1.0%	\$103,884,823	31.8%	\$110,009,752	33.7%
Major-Low	\$255,008	0.1%	\$369,835	0.1%	\$4,377,318	1.3%	\$5,002,161	1.5%
Major-High	\$373,703	0.1%	\$1,867,921	0.6%	\$12,684,561	3.9%	\$14,926,184	4.6%
Severe	\$247,341	0.1%	\$589,144	0.2%	\$11,140,539	3.4%	\$11,977,024	3.7%
Total	\$5,026,506	1.5%	\$8,727,083	2.7%	\$312,657,964	95.8%	\$326,411,553	100%

Figure 57: IHP Assisted Households by Damage Category and Disaster (Dollar Amount) (Source: FEMA IA)²⁸

²⁸ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

SBA Disaster Home Loan Assistance

SBA disaster home loans are provided to qualified homeowners and renters whose private property sustained damage that is not fully covered by FEMA or insurance. Once they are approved and agree with the loan terms, the SBA disburses the funds to the applicants. As of February 23, 2025, 1,751 SBA disaster home loan applicants have received a disbursement totaling \$68.4 million. See the table below.

SBA Disaster Home Loan Assistance Disbursement				
	Idalia	Debby	Helene	Total
# Disbursed	190	31	1,530	1,751
Disbursed \$	\$5,280,900	\$1,390,518	\$61,705,877	\$68,377,295

Figure 58: SBA Disaster Home Loan Disbursement (Number and Dollar Amount) (Source: SBA)²⁹

NFIP Assistance

Though NFIP assesses the total damage amount caused by flooding, the household does not receive a disbursement for the full amount of the damages. The disbursement amount is the damage amount, less any deductible. Due to this, the amount of assistance is less than the amount of damages quoted on the claim.

NFIP Assistance						
Flood Event	Low-Risk - Flood Zone		High-Risk - Flood Zone		Total	
	Disbursement \$	% of GT	Disbursement \$	% of GT	Disbursement \$	% of GT
Idalia	\$743,790	3.2%	\$984,711	4.3%	\$1,728,501	7.5%
Debby	\$1,333,365	5.8%	\$5,647,286	24.4%	\$6,980,651	30.2%
Helene	\$700,770	3.0%	\$13,698,672	59.3%	\$14,399,442	62.3%
Total	\$2,777,925	12.0%	\$20,330,669	88.0%	\$23,108,594	100%

Figure 59: NFIP Assistance by Flood Zone and Disaster (Source: FIMA NFIP)³⁰

GHARRP Assistance

As of February 28, 2025, GHARRP has disbursed \$2,343,360 to Public Housing Authorities that had damages from Hurricane Helene.

GHARRP Assistance			
GHARRP - Property Damage	Loss	Paid	Unmet Need
Grand Total	\$9,444,494	\$2,343,360	\$7,101,135

Figure 60: Public Housing Damages and GHARRP Assistance (Source: GHARRP)³¹

²⁹ (2/23/25) - Application Processing Statistics (Idalia, Debby, Helene)

³⁰ (3/2/25) - <https://www.fema.gov/openfema-data-page/fima-nfip-redacted-claims-v2>

³¹ (2/28/25) - Georgia Housing Authorities Risk Retention Pool, Helene Damage Report

Total Housing Unmet Need

For the Housing Unmet Need, DCA looked at four primary sources of data for both estimates of loss and award disbursements: FEMA, SBA, NFIP, and GHARRP. The largest estimated loss was captured from FEMA IHP data, accounting for over \$956 million. A little over a third of that, about \$326 million, has already been awarded, leaving an unmet need of over \$630 million.

SBA Loans identified a loss of over \$532 million, with \$68 million of that awarded, leaving an unmet need of \$464 million. It is possible that there is some duplication of the SBA loss with FEMA IHP loss, but with the currently available data, it is not possible to confirm if any loss information is duplicative. For NFIP, there was an estimated loss of \$24 million, with \$23 million awarded, leaving an unmet need of \$921,057.

Finally, the Public Housing loss is estimated at \$9.4 million, with over \$2.3 million being awarded, leaving an unmet need of \$7.1 million.

In combination, the State of Georgia has an estimated housing loss of \$1.522 billion, of which \$420 million has been awarded. This leaves an **unmet housing need of \$1,102,522,201**.

Housing Unmet Need			
Source	Estimated Loss	Awarded/ Disbursed	Unmet Need
FEMA IHP	\$956,865,479	\$326,411,553	\$630,453,926
SBA Loan	\$532,423,379	\$68,377,295	\$464,046,084
NFIP	\$24,029,651	\$23,108,594	\$921,057
Public Housing	\$9,444,494	\$2,343,360	\$7,101,135
Grand Total	\$1,522,763,003	\$420,240,802	\$1,102,522,201

Figure 61: Total Housing Unmet Need

2.2. Infrastructure

To determine unmet needs in Infrastructure, FEMA Permanent Work figures (specifically Categories C-G) for each of the three 2023-2024 Georgia Hurricanes were examined. The table below shows the combined total for all three disasters, with the Preliminary Damage Assessments (PDA) amount in the Anticipated PA column.

DCA also reached out to local governments to request data on local unmet recovery needs, particularly in the infrastructure category. DCA is still receiving responses from local governments and is aware that the FEMA figures will continue to grow significantly and intends to incorporate additional unmet need data as it becomes available.

In Georgia’s three 2023-2024 Hurricanes, FEMA is committed to a 75% federal cost share, leaving a remaining local cost share of 25%. We are attributing the local cost share portion as the estimated unmet need. The total unmet need for Permanent Work is almost \$115 million.

The bulk of the Unmet Need (81.7%) is in Category F for utilities, a total unmet need of \$93.9 million. In addition to power generation and transmission, Category F – Utilities includes damage to communication systems, sewerage systems, natural gas transmission, and water treatment and delivery systems. Category G (Parks, Recreational Facilities, and Other Items) accounts for the next largest amount of \$8.3 million, or 7.2% of the unmet need total. In addition to Parks and Recreations Facilities, Category G assistance also includes ports and boat docks which are common in Southeast Georgia. As more damage assessments are completed, the value of permanent work needed will continue to grow, especially for Hurricane Helene, so DCA anticipates these numbers will increase.

FEMA Permanent Work (Categories C-G) for 2023-2024 Georgia Hurricanes				
Category	Anticipated PA	Federal Cost Share (75%)	Local Cost Share – Unmet Need (25%)	% of Total Unmet Need
C - Roads and Bridges	\$24,872,335	\$18,654,251	\$6,218,084	5.4%
D - Water Control Facilities	\$8,170,000	\$6,127,500	\$2,042,500	1.8%
E - Buildings and Equipment	\$18,064,328	\$13,548,246	\$4,516,082	3.9%
F - Utilities	\$375,585,725	\$281,689,294	\$93,896,431	81.7%
G - Parks, Recreational Facilities, and Other Items	\$33,242,866	\$24,932,150	\$8,310,717	7.2%
Total	\$459,935,253	\$344,951,440	\$114,983,813	100%

Figure 62: FEMA Permanent Work (Categories C-G) for 2023-2024 Hurricanes (Source: GEMA)³²

The top 5 counties with permanent work unmet need as of February 28, 2025, are below. Columbia County, which is a HUD-identified MID, has almost double the unmet need of the second-most county with unmet need, Lowndes. Four of the five counties are HUD-identified MIDs; the fifth, Wayne County, is a state-identified MID.

³² (2/28/25) - Preliminary Damage Assessments (Idalia, Debby, Helene)

Top 5 Category C-G Unmet Need	
County	C-G Unmet Need
Columbia*	\$53,202,772
Lowndes*	\$26,788,907
Coffee*	\$25,175,384
Toombs*	\$18,372,205
Wayne**	\$17,015,909
*HUD-Identified MIDs, **State-Identified MID	

Figure 63: Top 5 Category C-G Unmet Need (Source: GEMA)³³

Power Outages

The 2023-2024 Hurricanes caused widespread power outages in Georgia, especially in rural and suburban areas. Significant infrastructure damage was sustained by the Georgia Electric Membership Cooperatives (EMCs), which serve as one of the state's primary electricity providers.

Hurricane Idalia caused severe power disruptions in southeast Georgia. Over 210,000 outages³⁴ were reported, with more than 100,000 customers³⁵ still without power a day later, with Georgia Power's system responsible for about three-quarters of the disruptions. Some of the hardest hit areas included Lowndes County, with 25,977 outages, as well as counties like Berrien, Clinch, Coffee, and Lanier, which experienced widespread disruptions.³⁶

Tropical Storm Debby also caused widespread power outages across Georgia, especially in the Valdosta area, leaving 12,000 residents in Lowndes County without power.³⁷ The storm's winds and heavy rains created conditions similar to those caused by Hurricane Idalia, once again leaving many residents without power for an extended period. According to Georgia Power, over 100,000 customers were affected by the storm for several days.³⁸

The most severe impact came from Hurricane Helene, which struck in September 2024. This storm severely damaged the power grid and caused extensive power outages, particularly in South Central Georgia, where nearly 100% of the electrical systems were disrupted, as seen on the Georgia Power Outage map below (Figure 64). According to Georgia Power, 1.5 million people across 53 counties lost power and in total, over 11,800 power poles were broken, 1,500 miles of power lines were knocked down, and 5,800 transformers were damaged. The damage from Hurricane Helene was so severe that restoration crews were required to rebuild much of the damaged infrastructure rather than simply reconnecting existing lines. With FEMA declaring the affected areas as major disaster zones, more than 20,000 personnel, alongside 35 partner companies from across the U.S. and Canada, were

³³ (2/28/25) - Preliminary Damage Assessments (Idalia, Debby, Helene)

³⁴ <https://www.politico.com/news/2023/08/30/idalia-power-outages-florida-00113449>

³⁵ <https://www.utilitydive.com/news/southeast-customers-without-power-outage-hurricane-idalia-florida-georgia-duke-fpl/692422/>

³⁶ <https://www.walb.com/2023/08/30/idalia-leaves-over-150k-customers-without-power-georgia/>

³⁷ <https://www.walb.com/2024/08/06/tropical-storm-debby-leaves-thousands-valdosta-residents-without-power/>

³⁸ <https://www.georgiapower.com/news-hub/weather-safety/georgia-power-continues-response-to-tropical-storm-debby.html>

mobilized to assist in the recovery efforts. Within 48 hours, over 523,000 customers had their power restored, and by the eighth day, 95% of those affected had service again.³⁹

The 2023-2024 Hurricanes demonstrated the vulnerability of Georgia's electrical infrastructure, particularly in rural and suburban areas served by the Georgia EMCs. The scale of the damage and the challenges faced in restoring power highlight the importance of robust, resilient systems and the need for continued investment in infrastructure to withstand extreme weather events.

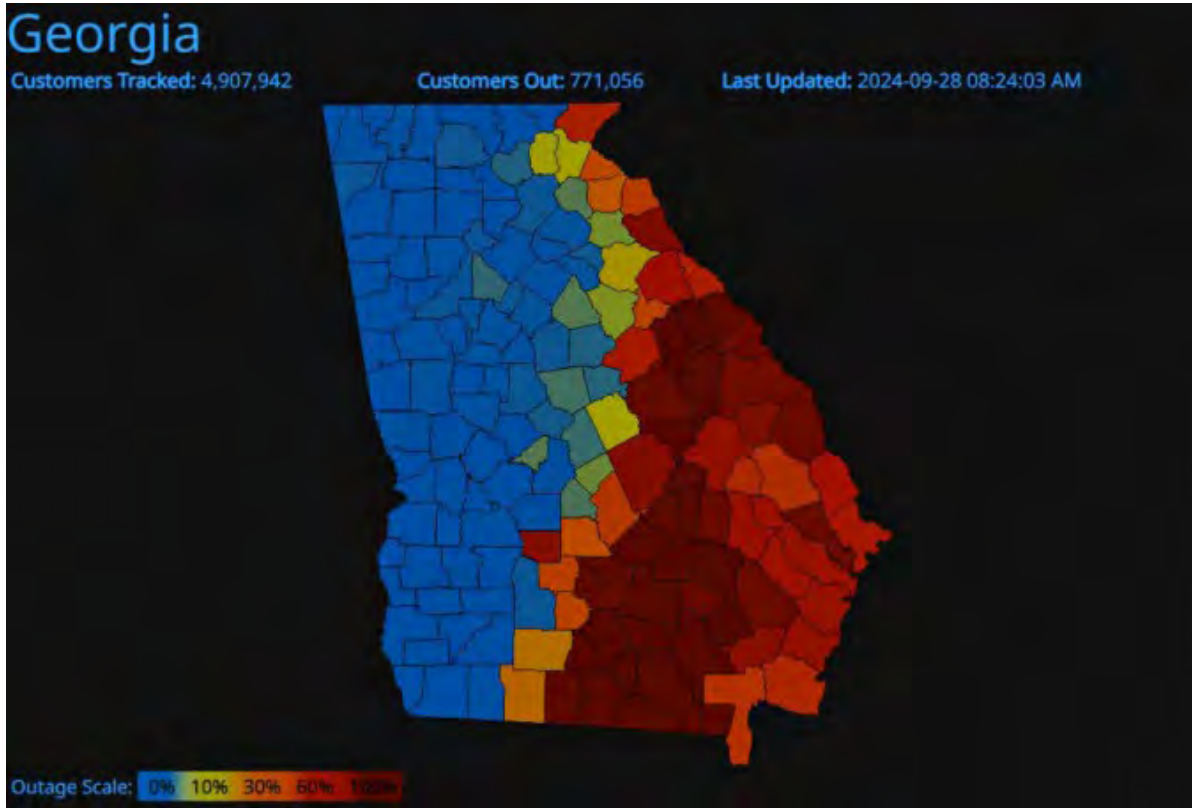


Figure 64: State-wide Power Outage Map for Hurricane Helene (9/28/24) (Source: poweroutage.us)

³⁹ <https://www.georgiapower.com/about/company/helene-assistance.html#:~:text=By%20dawn%20Friday%20morning%2C%20Helene,Georgia%20Power's%20140-year%20history>

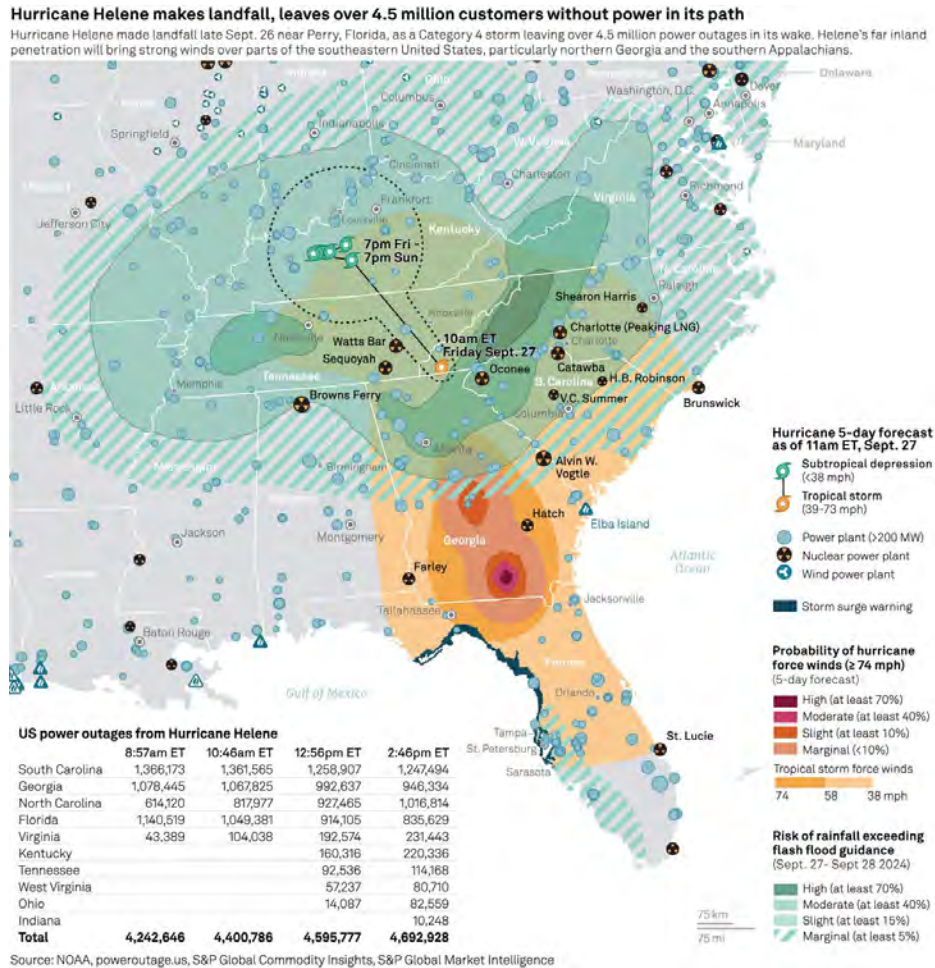


Figure 65: Hurricane Helene Landfall Map with Outages (Source: poweroutage.us)

Below are the top 5 counties with Category F (Utilities). Four of the five are HUD-identified MID counties, apart from Wayne County, which is a state-identified MID. There is a significant unmet need remaining for utilities as a result of the 2023-2024 Hurricanes.

Top 5 Counties with Cat F Unmet Need	
County	Cat F - Utilities
Lowndes*	\$ 26,846,186
Coffee*	\$ 24,975,976
Toombs*	\$ 17,480,324
Wayne**	\$ 16,731,910
Appling*	\$ 16,440,991

*HUD-Identified MID, **State-Identified MID

Figure 66: Top 5 Counties with Cat F Unmet Needs (Source: GEMA)⁴⁰

⁴⁰ (2/28/25) - Preliminary Damage Assessments (Idalia, Debby, Helene)

Almost the entirety (99.7%) of Category F preliminary damage assessed was in the Georgia Electric Membership Cooperatives (EMC). The electric grid was severely impacted by the 2023-2024 Hurricanes.

Hurricane Helene Cat F (Utilities) Preliminary Damage Assessment				
Non-EMC Amount	Non-EMC %	EMC Amount	EMC %	Total Amount
\$1,077,872	0.3%	\$346,115,543	99.7%	\$347,193,415

Figure 67: Hurricane Helene Cat F Preliminary Damage Assessment (Source: GEMA)⁴¹

Roads and Bridges

Roads and bridges were also heavily impacted by the 2023-2024 Hurricanes. The top 5 counties with Category (Roads and bridges) unmet needs are listed below. Three of the five are HUD-identified MID counties.

Roads and Bridges (Cat C) Unmet Needs	
County	Cat C (Roads and Bridges) Unmet Needs
Worth	\$3,626,640
Treutlen*	\$2,067,207
Turner	\$1,500,000
Bryan*	\$1,295,000
Atkinson*	\$1,094,300
*HUD-Identified MID	

Figure 68: Cat C Unmet Needs (Source: GEMA)⁴²

Hazard Mitigation Grant Program

FEMA’s Hazard Mitigation Grant Program (HMGP) provides funding to state, local, tribal, and territorial governments so they can develop hazard mitigation plans and rebuild in a way that reduces or mitigates future disaster losses in their communities. This grant funding is available after a presidentially declared disaster to localities and states.

According to FEMA data, Hurricane Idalia has a ceiling amount of \$12.4 million, with a 25% local cost share. Tropical Storm Debby has an HMGP ceiling amount of \$2.28 million, with a 25% local cost share. Hurricane Helene has an HMGP ceiling of \$414.2 million, with a 25% local cost share. The State of Georgia is committed to covering 10% of the cost share, leaving an unmet need of 15% of the local cost share. Combined, the three disasters have an unmet need of \$64.4 million, which is the local cost share.

⁴¹ (2/28/25) - Preliminary Damage Assessments (Helene)

⁴² (2/28/25) - Preliminary Damage Assessments (Idalia, Debby, Helene)

HMGP applications for Hurricane Idalia are almost complete. HMGP applications for Tropical Storm Debby and Hurricane Helene are still being accepted, and awards are anticipated to be announced in the fall. This data will be updated after awards are finalized.

FEMA HMGP Disaster Summary				
Disaster	HMGP Ceiling Amount	Federal Share (75%)	State portion of Local Cost Share (10%)	Unmet Need of Local Cost Share (15%)
Hurricane Idalia	\$12,418,215.00	\$9,313,661.25	\$1,241,821.50	\$1,862,732.25
Tropical Storm Debby	\$2,484,800.00	\$1,863,600.00	\$248,480.00	\$372,720.00
Hurricane Helene	\$414,241,926.00	\$310,681,444.50	\$41,424,192.60	\$62,136,288.90
Total	\$429,144,941.00	\$321,858,705.75	\$42,914,494.10	\$64,371,741.15

Figure 69: FEMA HMGP Disaster Summary (Source FEMA HMGP)⁴³

Units of General Local Government Survey

In an effort to gather as much local data as possible, DCA distributed a survey to Units of General Local Government (UGLGs) to gather information on potential unmet needs. DCA is coordinating with UGLGs, who responded to obtain all available data, including cost estimates for needed work, and will continue to engage local governments to realize the complete scope of the unmet infrastructure need. DCA will continue working closely with UGLGs to gather information on potential unmet needs and identify potential opportunities to further assist communities in need of recovery assistance.

Total Infrastructure Unmet Need

DCA analyzed all of the available data on FEMA Permanent Work, specifically Categories C – G for each storm and Hazard Mitigation Grant Program (HMGP) funds. As would be expected based on the impacts of the storms, a vast majority of the unmet infrastructure need is in Category F- Utilities, making up 82% of the need, followed by Category G – Parks, Recreation, accounting for 7.2% of the need.

Total Infrastructure Unmet Need			
Source	Estimated Loss	Awarded/ Anticipated	Unmet Need
FEMA Permanent Work (Cat. C-G)	\$459,935,253	\$344,951,440	\$114,983,813
HMGP	\$429,144,941	\$364,773,200	\$64,371,741
Total - Infrastructure	\$889,080,194	\$709,724,640	\$179,355,554

Figure 70: Total Infrastructure Unmet Needs (Source: GEMA & FEMA HMGP)⁴⁴

⁴³ (3/1/25) - <https://www.fema.gov/openfema-data-page/hazard-mitigation-grant-program-disaster-summaries-v2>

⁴⁴ (2/28/25) - Preliminary Damage Assessments (Idalia, Debby, Helene)

2.3. Economic Revitalization

To determine the unmet economic need, the State analyzed available data related to the three disasters from the Small Business Administration (SBA). Additionally, the State also released a survey asking individuals and Units of General Local Government (UGLG) questions about their remaining needs including in the area of economic revitalization.

SBA Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL)

Businesses and private nonprofit organizations of any size may borrow up to \$2 million to repair or replace disaster-damaged or destroyed real estate, machinery and equipment, inventory, and other business assets through the SBA. For small businesses, small agricultural cooperatives, small businesses engaged in aquaculture, and most private nonprofit organizations, the SBA offers Economic Injury Disaster Loans (EIDLs) to help meet working capital needs caused by the disaster. Economic Injury Disaster Loan assistance is available regardless of whether the business suffered any physical property damage.

SBA Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) – Loss Multiplier Calculation

As of the most recent SBA data update on February 23, 2025, the SBA has received 3,143 SBA Business loan applications and 1,629 EIDL applications from disaster survivors from Idalia, Debby, and Helene. Of all the applicants who applied for these SBA loans, 816 applicants have received an offer for business loans and 333 for EIDL. 552 business loans and 301 EIDL applicants who received offers have received disbursement from the SBA. The average amount offered for SBA business loans and EIDLs was \$46,240 and \$44,028, respectively, as of February 23, 2025 (See Table Below).

Average Offered SBA Loan Amounts			
Type	# of Offers	Total Amount Offered	Average Offer Amount
Business Physical Disaster Loan	816	\$37,731,736	\$46,240
EIDL	333	\$14,661,300	\$44,028

Figure 71: Average SBA Disaster Business Loan Amounts (Source: SBA)⁴⁵

SBA Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) – Unmet Need Population Calculation

Applicants applying for a disaster SBA loan must qualify based on credit history, income, and other requirements, which may vary depending on the loan amount and if the applicant received a disaster SBA loan in the past. For physical damage loans over \$50,000, the SBA requires collateral of equal or greater value to the loan. If the loan exceeds \$200,000, SBA will require the business owner's primary residence as collateral. Some business owners may feel uncomfortable with this requirement or may not have enough equity in their assets and withdraw their application, though they truly need

⁴⁵ (2/23/25) - Application Processing Statistics (Idalia, Debby, Helene)

assistance. Applicants who did not comply with the terms of a previous SBA loan may also be considered ineligible. Due to these barriers to receiving a disaster SBA loan, along with the limited time since Debby and Helene, 2,591 SBA Business Physical Disaster Loan applicants and 1,328 EIDL applicants that applied for a loan have not received a disbursement from the SBA.

Applicants Remaining without an SBA Loan			
Type	# of Applicants	# Receiving a Disbursement	# with No Disbursement
Business Physical Disaster Loan	3,143	552	2,591
EIDL	1,629	301	1,328

Figure 72: Remaining Applications without SBA Loans (Source: SBA)⁴⁶

SBA Business Physical Disaster Loans and Economic Injury Disaster Loans (EIDL) – Estimated Unmet Need Calculation

To better estimate the total unmet need due to the 2023-2024 Hurricanes, DCA used the average offer amount for disaster SBA loans as the loss multiplier for all applicants who have not received a disbursement from the SBA.

Applicants Remaining without an SBA Loan (Dollar Amount)			
Type	# with No Disbursement	Average Offer Amount	SBA Unmet Need
Business Physical Disaster Loan	2,591	\$46,240	\$119,807,510
EIDL	1,328	\$44,028	\$58,469,088

Figure 73: Applicants Remaining without SBA Loans by Dollar Amount (Source: SBA)⁴⁶

Units of General Local Government Survey

In an effort to gather as much local data as possible, DCA distributed a survey to Units of General Local Government (UGLGs) to gather information on potential unmet needs. DCA is coordinating with UGLGs who responded to obtain all available data and will continue to engage local governments to realize the complete scope of the unmet need. DCA will continue working closely with UGLGs to gather information on potential unmet needs and identify potential opportunities to further assist communities in need of recovery assistance.

⁴⁶ (2/23/25) - Application Processing Statistics (Idalia, Debby, Helene)

Economic Revitalization Unmet Need			
Source	Estimated Loss	Awarded/Disbursed	Unmet Need
SBA Business Loans	\$140,932,802	\$21,125,292	\$119,807,510
SBA Economic Injury Disaster Loan (EIDL)	\$69,849,070	\$11,379,982	\$58,469,088
Total – Economic Revitalization	\$210,781,872	\$32,505,274	\$178,276,598

Figure 74: Total Economic Revitalization Unmet Need

2.4. Unmet Needs Summary

Based on the analysis of 94 impacted counties from the 2023-2024 Hurricanes, there is an identified overall unmet need of **\$1,460,154,354**. The **Housing unmet need is \$1,102,522,201**, which is a majority of the overall need, accounting for 76% of the overall need. The **Infrastructure unmet need is \$179,355,554**, which accounts for 12% of the overall need. The **Economic Revitalization unmet need is \$178,276,598**, which accounts for 12% of the overall need.

Unmet Needs Summary				
Unmet Needs Assessment	Estimated Loss/Need (-)	Funding Awarded or Obligated (+)	Unmet Need (=)	% of Unmet Need
Housing				
Owner Occupied	\$551,321,827		\$333,628,490	30%
Housing Assistance		\$83,252,179		0%
Other Needs Assistance		\$134,441,158		0%
Renter Occupied	\$405,543,652		\$296,825,435	27%
Housing Assistance		\$4,804,706		0%
Other Needs Assistance		\$103,913,511		0%
NFIP Payments	\$24,029,651	\$23,108,594	\$921,057	0%
SBA Disaster Home Loans	\$532,423,379	\$68,377,295	\$464,046,084	42%
Public Housing	\$9,444,494	\$2,343,360	\$7,101,135	1%
TOTAL - Housing	\$1,522,763,003	\$420,240,802	\$1,102,522,201	76%
Infrastructure				
Permanent Work (Cat. C-G)	\$459,935,253	\$344,951,440	\$114,983,813	8%
HMGP	\$429,144,941	\$364,773,200	\$64,371,741	4%
TOTAL - Infrastructure	\$889,080,194	\$709,724,640	\$179,355,554	12%
Economic Revitalization				
SBA Business Loans	\$140,932,802	\$21,125,292	\$119,807,510	8%
SBA Economic Injury Disaster Loan (EIDL)	\$69,849,070	\$11,379,982	\$58,469,088	4%
Total - Economic	\$210,781,872	\$32,505,274	\$178,276,598	12%
GRAND TOTAL	\$2,622,625,070	\$1,162,470,716	\$1,460,154,354	

Figure 75: Unmet Needs Assessment

3. Mitigation Needs Assessment

Mitigation Needs Background

The Mitigation Needs Assessment examines current hazards as well as future risks in order to determine which hazards must be considered when allocating CDBG-DR funds. Doing so involves using existing resources, such as the [Georgia Hazard Mitigation Strategy \(GHMS\)](#), to help DCA make data-informed decisions on how CDBG-DR funds will be utilized to support mitigation efforts. As part of Georgia's CDBG-DR allocation, 15% or \$34.66 million, is included as a set-aside for mitigation activities. For HUD CDBG-DR grants, mitigation activities are defined as "those activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters."

3.1. Georgia Hazard Mitigation Strategy

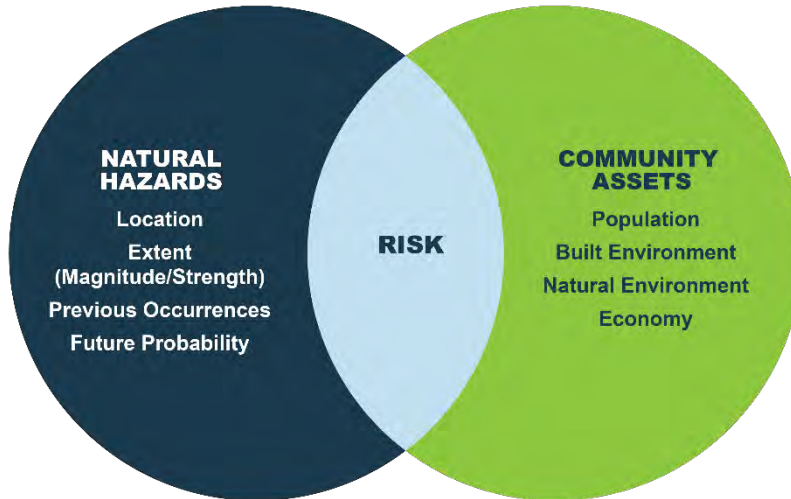
The State of Georgia's Enhanced Hazard Mitigation Plan (Enhanced HMP), updated in 2024, is a comprehensive, federally approved framework designed to identify and address the State's most significant hazards. Developed collaboratively by State agencies, local governments, and key stakeholders, including emergency management professionals and environmental organizations, the Enhanced HMP serves as the foundation for guiding mitigation priorities and strategies statewide. The 2024 update reflects new data, emerging risks, and lessons learned from recent disasters, aligning with FEMA's hazard mitigation planning requirements and serving as a critical resource for reducing the impact of natural and human-caused disasters.

To mitigate long-term disaster damage and avoid a cycle of destruction and rebuilding, the state has implemented Hazard Mitigation Planning, which provides a framework for risk-based decision-making to protect lives, property, and the economy. The most recent Georgia Hazard Mitigation Strategy (GHMS) for 2024-2029 identifies thirteen natural hazards that impact the state, assessing their vulnerabilities and outlining strategies to reduce those risks. The GHMS addresses critical areas such as housing, infrastructure, economic development, and emergency management, all of which are closely linked to the 2023-2024 Hurricanes. It also includes specific strategies for mitigating the impacts of hurricane winds, flooding, and tornadoes, which are directly relevant to the recent disaster events in the state.

Risk-Based Assessment Methodology

The State of Georgia has already developed and maintains a risk-based methodology to inform the State's Hazard Mitigation Strategy. With each update to the strategy, The Georgia Emergency Management Agency (GEMA) reviews the most recent Hazard Identification and Risk Assessment (HIRA) along with local plans and community input. Hazard assessments are also updated with new data, hazard events, maps, risk areas, and vulnerability information, and GEMA incorporates any new state planning guidance, including social vulnerability, vulnerability of structures and infrastructure, and future changing conditions as needed.

To prioritize hazards, GEMA assesses and ranks each hazard based on historical impacts, potential hazard impacts, and potential vulnerabilities. This methodology provides a structured approach to understanding and prioritizing the risks posed by various hazards in Georgia, helping to inform mitigation strategies and planning efforts.



Note: Modified from U.S. Geological Survey and Oregon Partnership for Disaster Resilience Models.

Figure 76: Natural Hazard / Community Asset Overlap Image (Source: GHMS)⁴⁷

Hazard Risk Assessments

The Georgia Hazard Mitigation Strategy (GHMS) employs hazard risk assessments for various identified hazards. The GHMS also includes a timeline of notable events and maps of all previous events and losses, as well as maps of potential events.

A Social Vulnerability Index (SoVI) analysis is included for each hazard type in the GHMS. The GHMS includes a mapping of hazard scores and SVI scores for each county. This information helps to inform a mitigation strategy that effectively identifies and prioritizes the needs of socially vulnerable populations.

Discussion of Community Lifelines is also included for each hazard type in the GHMS. Information on critical facilities and state facilities facing potential exposure is included. This information helps inform a mitigation strategy that utilizes a “Community Lifelines” approach to disaster recovery.

According to the GHMS, Georgia is most vulnerable to inland floods and tornadoes, ranking first and second, respectively. The table below identifies each potential hazard type facing Georgia. For additional information on each hazard type and a full assessment of the prioritization, rank, associated hazards, social vulnerability assessment, and community lifelines assessment, please visit the Georgia Hazard Mitigation Strategy Standard and Enhanced Plan. For ease of information access, the section titles and page numbers for each hazard assessment have been included in the table below.

⁴⁷ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

Hazard-Specific Assessments				
Hazard Type	Priority	Rank	Associated Hazards	Location in GHMS
Inland Flooding	High	1	Thunderstorms, tropical cyclones, dam failure	Section 2.8.6 Page 128
Tornado	High	2	Thunderstorms, tropical cyclones	Section 2.8.5 Page 117
Hurricane Wind	High	3	Tropical cyclones, hurricanes, tropical storms, tropical depressions, coastal storms	Section 2.8.1 Page 70
Severe Winter Weather	High	4	Snowfall, ice, high winds, extreme cold temperatures, winter coastal storms	Section 2.8.7 Page 142
Drought	High	5	-	Section 2.8.8 Page 154
Severe Weather	High	6	Thunderstorms, hail, lightening	Section 2.8.4 Page 108
Coastal Hazards	Medium	7	Tropical cyclones, hurricanes, tropical depressions, coastal storms, coastal winter storms, storm surge, coastal flooding.	Section 2.8.2 Page 82
Dam Failure	Medium	8	Flooding, technological (man-made) hazards	Section 2.8.12 Page 200
Extreme Heat	Medium	9	High heat, heat waves, excessive heat	Section 2.8.13 Page 217
Wildfire	Medium	10	-	Section 2.8.9 Page 163
Wind	Medium	11	Thunderstorms, downbursts, gustnadoes	Section 2.8.3 Page 97
Earthquake	Low	12	Ground shaking, liquefaction, landslides, tsunamis	Section 2.8.10 Page 178
Geologic Hazards	Low	13	Sinkholes, landslides, debris flow, mudslides, flooding, tropical cyclones, wildfire	Section 2.8.11 Page 191

Figure 77: Hazard Assessment Ranks and Priorities by Hazard Type (Source: GMHS)⁴⁸

⁴⁸ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

Vulnerability Analysis

Community Lifelines

Community Lifelines are defined as services that enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security.⁴⁹ When Community Lifelines are disrupted, the functionality of the community at large is disrupted. Lifelines are understood to be interdependent, as the destabilization of one often impacts or even destabilizes another. FEMA identifies the 8 core community lifelines as Safety and Security, Food, Hydration and Shelter, Health and Medical, Energy, Communications, Transportation, Hazardous Materials, and Water Systems. When lifelines are affected, survivors experience disruptions that reduce their ability to access critical services, which affects successful recovery.

The GHMS⁵⁰ includes a discussion of potentially impacted Community Lifelines for each identified hazard. For each hazard, the potentially impacted lifeline, its location, potential related hazards, impact scope, and an impact discussion are included. This information will be utilized to ensure the mitigation strategy related to the 2023-2024 Hurricanes is comprehensive and recognizes the ways in which lifelines are interdependent.

Following hurricane or wind hazards, the communication community lifeline is threatened as both landline and cellular service are often destabilized. Notably, landline communication is subject to failure during high wind events due to utility poles breaking, trees and limbs falling on lines, and cellular service is often lost during hurricane and severe weather events. Energy, or the electrical grid, is another asset that is vulnerable to high wind. As described in the GHMS, overhead power lines tend to be vulnerable to failure due to several causes, including trees and tree limbs falling on lines, poles breaking, and vehicle related accidents where lines run alongside roads (vehicle collisions with poles, etc.) The impacts of wind on the electrical grid following the 2023-2024 Hurricanes, particularly Hurricane Helene, lay bare how much devastation this hazard can cause.

During flood events, which often accompany hurricanes, the transportation community lifeline is also particularly vulnerable – specifically unpaved roads. Per the GHMS, while paved roads are certainly not invulnerable, rural unpaved roads are often more susceptible to washouts, especially after lengthy periods of wear and tear. In Tropical Storm Debby, the number of unpaved roads in the area likely contributed to dam failure and the high level of flooding in Southeast Georgia.

⁴⁹ <https://www.fema.gov/emergency-managers/practitioners/lifelines>

⁵⁰ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

Social Vulnerability

The Social Vulnerability Index (SoVI)⁵¹ is based on 14 factors that fall into four main groups:

- **Socioeconomic status:** Poverty, lack of access to transportation, and crowded housing
- **Household composition:** Age dependency, disability status, and special needs populations
- **Race/ethnicity/language:** Hispanic ethnicity, Native American populations, and other racial and ethnic groups
- **Housing/transportation:** Lack of access to transportation and crowded housing

The GHMS includes a discussion of Social Vulnerability, including a full assessment in Section 2.5. The State utilized the Centers for Disease Control and Prevention’s (CDC) Social Vulnerability Index (SoVI), which is a comparative metric that measures social vulnerability to environmental hazards by county. This tool is useful for both the analysis of potential risk to hazard as well as in identifying the capabilities for each county’s recovery activities post-disaster. The map below reflects the Social Vulnerability Score for each county in Georgia. For more information on the SoVI, including variables included and methods of assessment, please consult the GHMS.

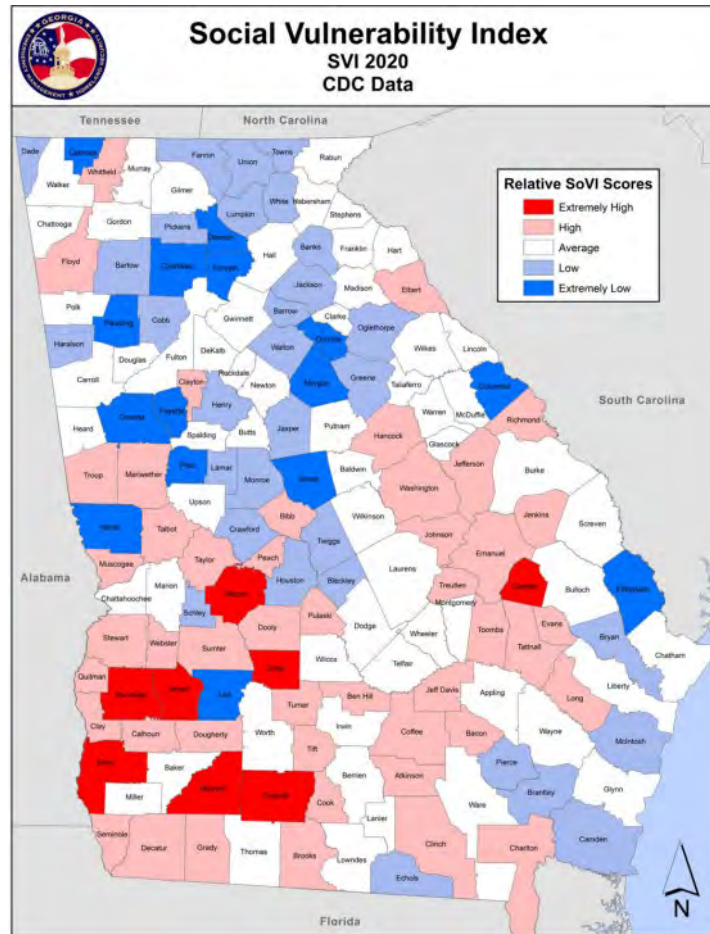


Figure 78: Social Vulnerability Index Map by County (Source: GHMS)⁵²

⁵¹ <https://toolkit.climate.gov/tool/social-vulnerability-index#:~:text=The%20SVI%20ranks%20each%20tract,well%20as%20an%20overall%20ranking>

⁵² (3/4/24) - <https://qema.georgia.gov/hazard-mitigation-planning>

The State also included a review of social vulnerability for a variety of potential hazard types including Sea, Lake, and Overland Surges from Hurricanes (SLOSH), which is an estimate of storm surge generated by a hurricane, wind, flood, wildfire, and earthquake. These specific hazard types were selected due to their spatial constriction or strong spatial patterns. The GHMS combined the hazard score of each county for each hazard type with the SoVI score to arrive at a composite score. This allows for the effective identification of overall vulnerability and risk by county. The table below reflects the counties with the highest composite scores. Of the 10 ten counties, 1 is a HUD-identified MID, and 6 are state-identified MID. For more information, the full analysis can be found on page 38 of the GHMS.

Top 10 Counties with Highest Composite Hazard and SVI Scores	
County	Composite Score (Hazard + SVI)
Chatham**	23.0
Liberty**	20.3
Glynn**	20.2
Long**	19.6
Candler*	18.6
McIntosh	18.5
Camden	18.4
Whitfield	18.1
Evans**	18.0
Colquitt**	17.4
*HUD-Identified MID; **State-Identified MID	

Figure 79: Top Ten Composite Scores by County (Source: GHMS)⁵³

The Hazard Mitigation Strategy also includes a discussion of social vulnerability for each identified hazard type. This is conducted through a comparison of SVI maps with relevant maps for each hazard type. This comparison identifies patterns and overlaps potential high threat to high vulnerability score. For example, the image below compares the SVI scores with the Wind Extent map. An analysis of these maps indicates that the top 8 counties with the highest social vulnerability scores are in areas susceptible to at least a 64 mph wind gust.

⁵³ (3/4/24) - <https://qema.georgia.gov/hazard-mitigation-planning>

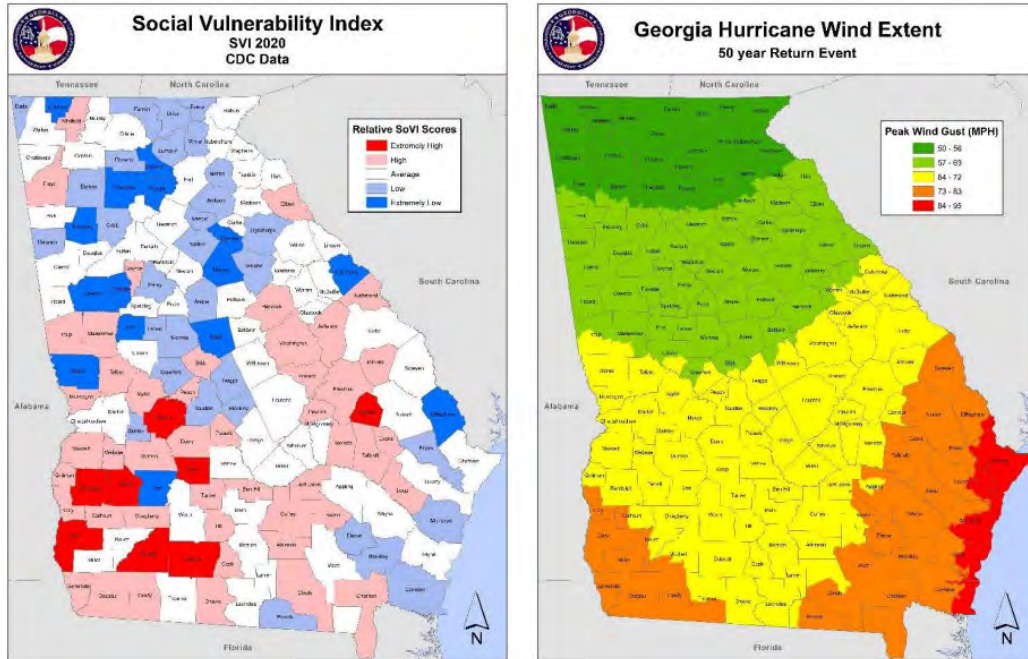


Figure 80: SVI and Wind Extent Mapping by County (Source: GHMS)⁵⁴

This analysis can be utilized to ensure the effective use of program funds for the targeting of socially vulnerable populations.

The development of this Action Plan included an analysis of social vulnerability through the mapping of data related to individuals with disabilities, elderly individuals, and individuals with lower English proficiency. These specific socially vulnerable populations are important to consider during the planning of CDBG-DR activities. More information on the consideration of these populations and other vulnerable populations is included in the section “Fair Housing and Civil Rights Data Collection.”

3.2. Overview of Hazard Mitigation Needs by Program Area

Mitigation Needs – Housing

Hazard – Wind, Hurricane Wind

As described throughout the document, wind and the accompanying hazards can wreak havoc on a community and cause widespread destruction - strong winds have the power to flatten trees and entire structures and cast objects hundreds of yards. As was outlined in the unmet needs section above, across the three disasters, the households impacted by wind vastly outnumbered households impacted by flooding – 97.2% compared to 2.8%, respectively. See the table below for additional information.

⁵⁴ (3/4/24) - <https://qema.georgia.gov/hazard-mitigation-planning>

Number of Households by Cause of Damage and Disaster						
Disaster	Flood Damage		Wind Damage		Grand Total	
	# of HH	% of GT	# of HH	% of GT	# of HH	% of GT
Idalia	223	0.3%	4,315	4.9%	4,538	5.1%
Debby	563	0.6%	3,609	4.1%	4,172	4.7%
Helene	1,682	1.9%	77,817	88.2%	79,499	90.1%
Total	2,468	2.8%	85,741	97.2%	88,209	100%

Figure 81: Number of Households by Cause of Damage and Disaster (Source: FEMA IA)⁵⁵

Building stronger homes and retrofitting existing structures to better withstand and prevent damages that commonly occur during high winds, hurricanes, and other severe weather would increase the resilience of these structures and reduce the long-term risk of loss of life and damage to property by lessening the impact of future disasters. The State of Georgia has included promoting structural retrofits for structures that are vulnerable to wind events as a mitigation action to help reduce wind related hazards in the GHMS.

Hazard – Inland Flooding

While the 2023-2024 Hurricanes caused more wind related damage to homes, repetitive inland flooding is the highest ranked hazard in the state and has been a long-term burden for homeowners, business owners, and the general community. The table below defines Repetitive Loss Structures and Severe Repetitive Loss Structures.

Qualities of RL vs SRL Structures	
Repetitive Loss (RL) Structure	<ul style="list-style-type: none"> NFIP Insured At least two paid losses of \$1,000 in any ten-year period (since 1978)
Severe Repetitive Loss (SRL) Structure	<ul style="list-style-type: none"> NFIP Insured Incurred flood damage for which 4 separate claim payments have been made Each claim (building only) exceeds \$5,000 AND the cumulative amount exceeds \$10,000; OR 2 separate claims (building only) where the cumulative amount exceeds the market value

Figure 82: RL vs SRL Structures (Source: NFIP)⁵⁶

Areas where clusters of Repetitive Loss (RL) and Severe Repetitive Loss (SRL) are seen include Metro Atlanta and Richmond, Lee, Dougherty, Chatham and Glynn County. See the map below. Properties with frequent flood claim losses are possible targets for mitigation actions

⁵⁵ (3/1/25) - <https://www.fema.gov/openfema-data-page/individuals-and-households-program-valid-registrations-v1>

⁵⁶ <https://www.fema.gov/openfema-data-page/nfip-multiple-loss-properties-v1>

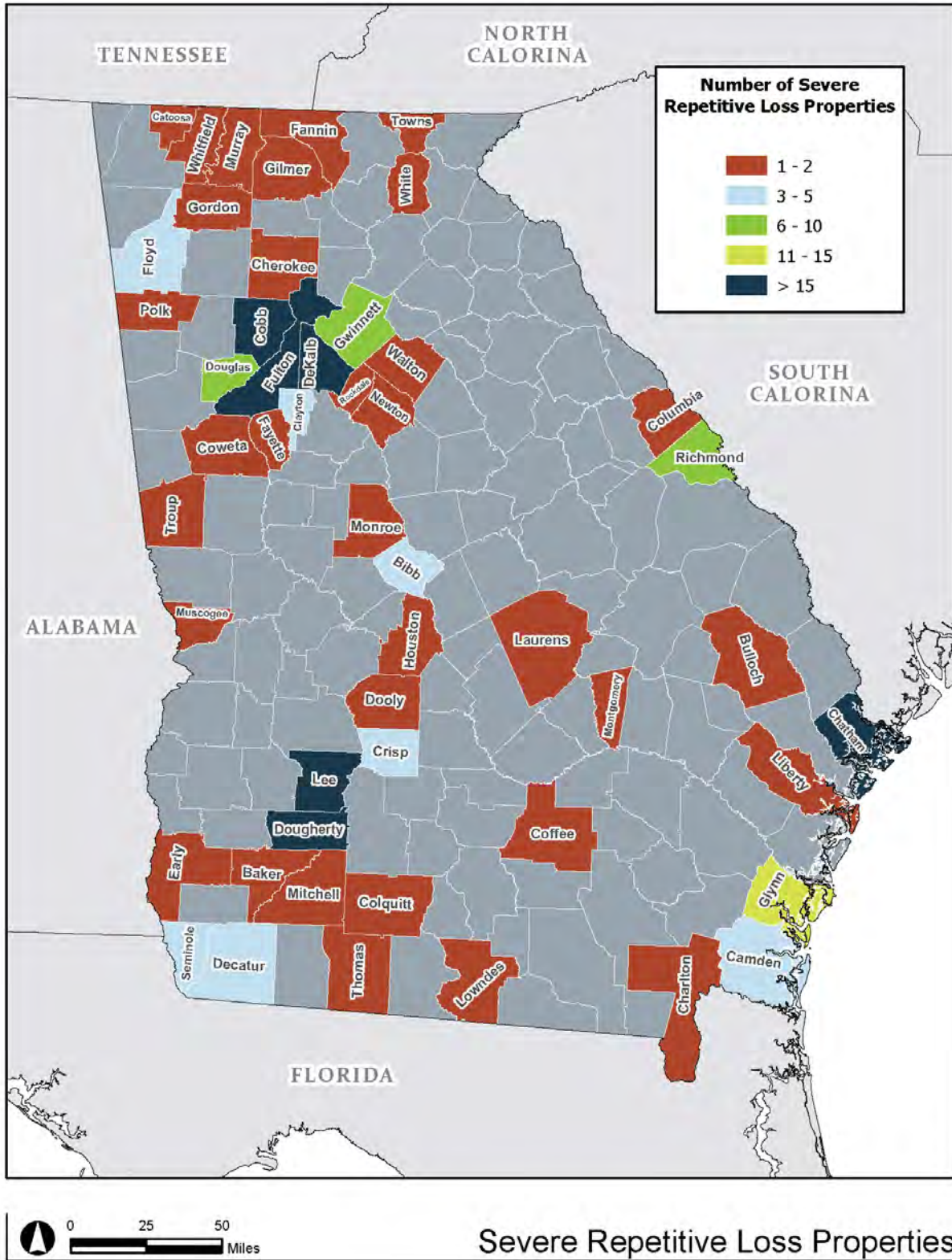


Figure 83: Severe Repetitive Loss Properties Map (July 2023) (Source: FEMA)⁵⁷

⁵⁷ [NFIP Multiple Loss Properties - v1 | FEMA.gov](https://www.fema.gov)

Counties that are both HUD MID or State MID counties and contain severe repetitive loss properties include:

Repetitive Loss Properties		
County	Total Amount Paid	Total Number of Properties
HUD-identified MIDs		
Bryan	\$935,793.19	6
Coffee	\$587,667.73	8
Columbia	\$241,762.86	5
Jeff Davis	\$9,964.37	1
Laurens	\$1,023,659.52	9
Lowndes	\$844,127.61	7
Richmond	\$2,457,281.42	58
Toombs	\$228,773.35	6
Wheeler	\$16,981.97	1
State-identified MIDs		
Ben Hill County	\$37,009.65	1
Brooks County	\$178,582.23	2
Bulloch County	\$177,118.15	6
Chatham County	\$38,185,074.21	581
Colquitt County	\$581,655.12	6
Effingham County	\$3,643.64	1
Glynn County	\$15,707,000.08	158
Liberty County	\$136,943.70	4
Tattnall County	\$76,495.36	2
Telfair County	\$80,965.92	2
Tift County	\$2,092,730.60	5
Ware County	\$39,990.89	3

Figure 84: Repetitive Losses by County (Source: GHMS)⁵⁸

Richmond, Laurens, Bryan, and Lowndes counties have all been identified by HUD as the most impacted and distressed counties and have each suffered at least \$500,000 in repetitive loss claims. Additionally, Glynn and Chatham counties have significant repetitive loss claims and have been identified by the State as the most impacted and distressed counties.

The overall number of repetitive loss structures has increased since 2018, going from 1,786 repetitive loss and 194 severe repetitive loss structures to 2,301 repetitive loss and 315 severe repetitive loss structures in 2023. GHMS has prioritized mitigation and/or removal of repetitive loss and severe repetitive loss structures from flood prone areas. CDBG-DR funded housing and infrastructure

⁵⁸ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

programs in these counties will benefit from incorporating mitigation activities to protect homes against further storm damage. DCA will encourage activities related to stormwater management in flood-impacted areas and will support projects that include retrofits, elevation, and buyout activities.

Mitigation Needs – Infrastructure

Hazard – Inland Flooding

As discussed above, inland flooding is the top ranked hazard in the State of Georgia. The regions with major losses from flooding include the Atlanta area, the Augusta area, and southwestern Georgia. However, the entire State of Georgia has experienced loss from flooding.

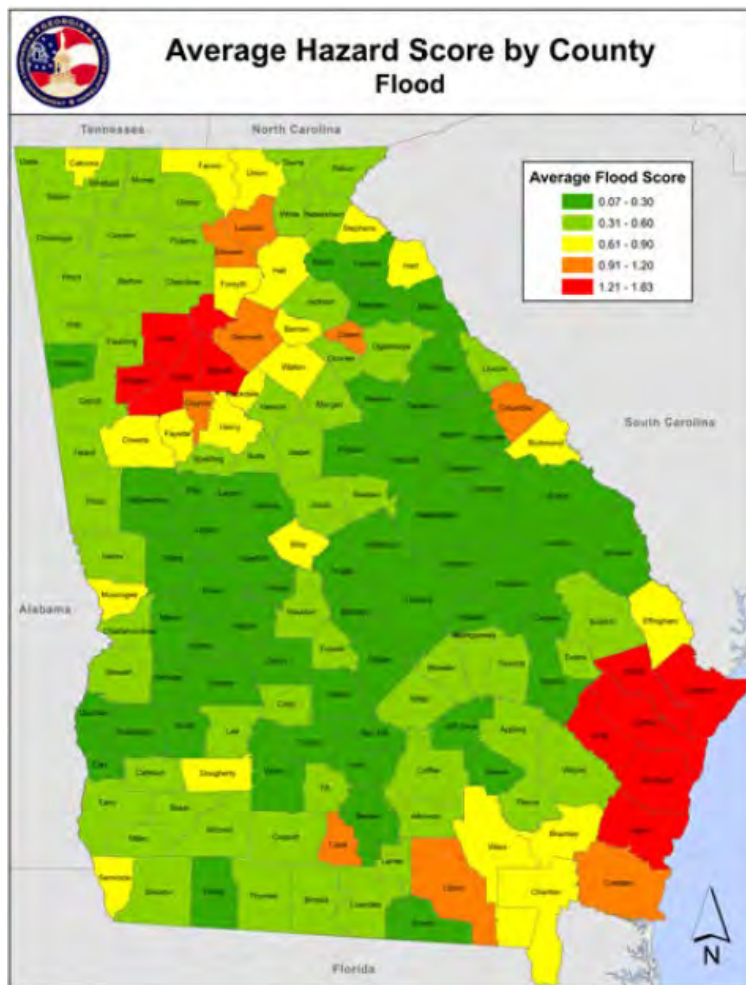


Figure 85: Average Hazard Score by County from Flooding (Source: GHMS)⁵⁹

According to the Hazard Mitigation Strategy, one particularly vulnerable lifeline in times of flooding and heavy rain is transportation infrastructure – specifically unpaved roads. While paved roads are certainly not invulnerable, rural unpaved roads are often more susceptible to washouts, especially after lengthy periods of wear and tear. The figure below shows the percentage of unpaved roads for each county.

⁵⁹ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

Notably, the counties directly exposed to the coastline (Chatham, Bryan, Liberty, McIntosh, Glynn, and Camden) all have 60% or more of their roads paved. Though most of the counties just west of the coastal counties have less than 60% of their roads paved, Brantley, Pierce, Bacon, Appling, and Berrien have less than 45% of their public roads paved. Unpaved road washouts can restrict access to the core community lifelines.

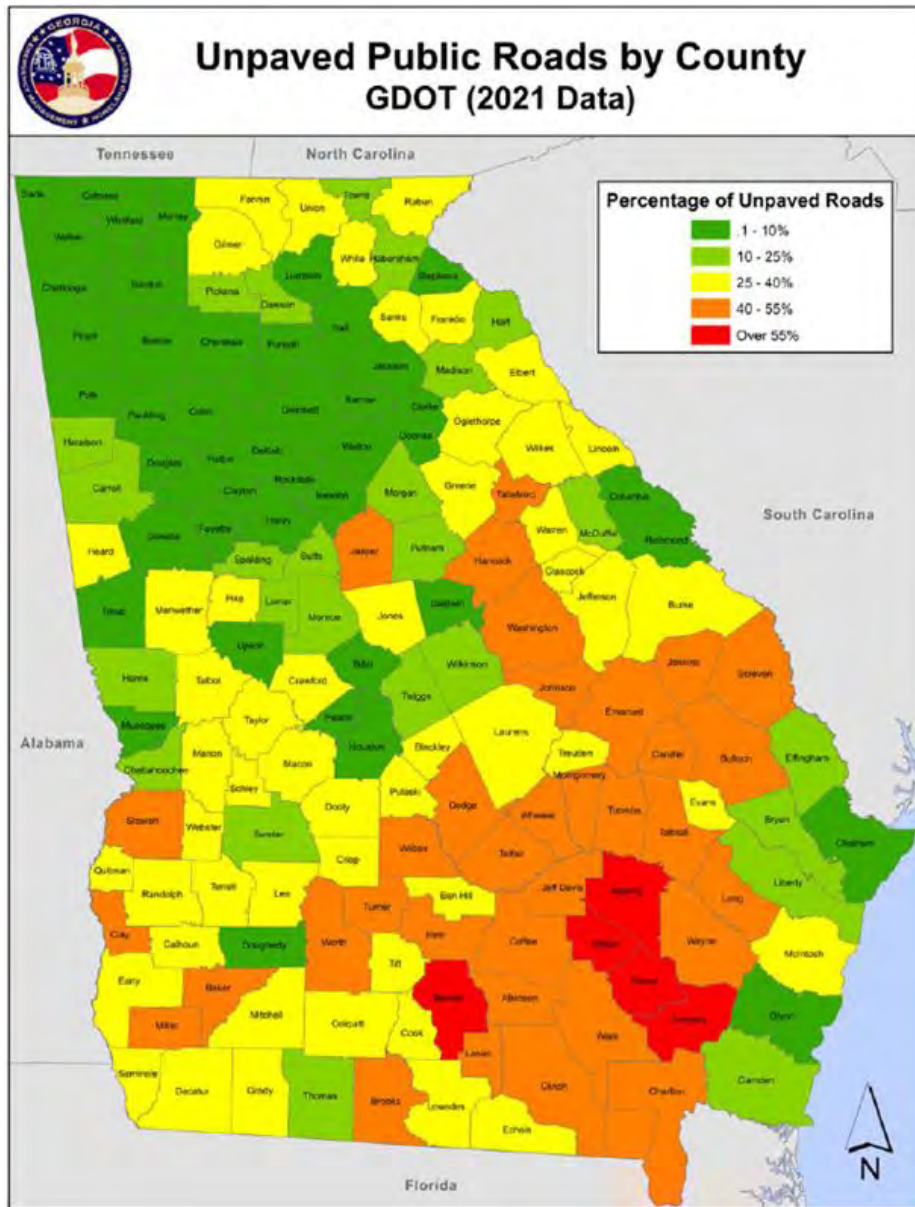


Figure 86: Unpaved Public Roads (Source: GHMS)⁶⁰

Per the GHMS, the most effective mitigation measures include acquisition, elevation, acquisition/relocation, drainage, planning, safe rooms, and generators for Critical Facilities. The State already has a history of supporting local and regional capability and capacity building efforts, including, but not limited to, flood and drainage master plans, local recovery and redevelopment planning, and the

⁶⁰ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

inclusion of drainage improvements in mitigation strategies. Continuing support of these mitigation efforts through CDBG-DR funds will increase resilience in the state and help reduce long term risk of damage to and loss of property. DCA will encourage activities related to stormwater management in flood-impacted areas.

Hazard – Wind, Hurricane Wind

One asset particularly vulnerable to high winds is the electrical grid. Overhead power lines are vulnerable to damage from wind gusts and from trees and tree limbs falling on lines. Electrical poles are vulnerable to damage from direct winds or to vehicle accidents where powerlines run alongside roads. These damages can often cause power failure. While many newer developments use underground lines, older developments are usually served by overhead power lines. Also, while newer developments often have underground power lines, they are usually served by overhead power lines leading up to the point where the newer underground wiring begins. The Department of Energy tracks power outage reports, which the State was able to use to identify which counties tend to have more power outages, as well as which counties tend to have a higher percentage of their customers reporting power outages.

The table below reflects a list of counties with state facilities exposed to >90 mile per hour winds. The highlighted counties are either HUD-identified or state-identified MIDs. Including mitigation measures such as retrofits or including generators where possible could provide utilities and residents with additional protection from power loss in high wind events.

TABLE 2.56A: TOP TEN COUNTIES VALUE OF STATE FACILITIES EXPOSED TO >90 MPH WINDS

Stated Owned Facilities		State Leased Facilities		Other State Facilities	
County	Value of Facilities*	County	Value of Insured Contents**	County	Value of Insured Assets**
Richmond	\$1,671,301,338	Muscogee	\$26,629,032	Chatham	\$1,540,781,500
Chatham	\$1,229,301,231	Bulloch	\$12,452,272	Glynn	\$147,220,149
Bulloch	\$904,891,048	Bibb	\$11,945,084	Bulloch	\$19,966,103
Baldwin	\$864,670,743	Chatham	\$9,543,757	Baldwin	\$19,030,064
Lowndes	\$741,909,644	Richmond	\$7,891,008	Richmond	\$17,825,992
Muscogee	\$615,674,770	Dougherty	\$5,109,794	Lowndes	\$14,292,171
Dougherty	\$560,742,613	Lowndes	\$4,875,097	Tattnall	\$10,340,450
Glynn	\$422,350,017	Emanuel	\$4,451,134	Murray	\$8,327,923
Bibb	\$392,935,520	Baldwin	\$3,678,000	Sumter	\$7,215,530
Tift	\$339,442,121	Floyd	\$2,887,152	Macon	\$6,566,198

*Stated owned facilities data based on the higher of insurance or replacement cost. Where no value is provided, an average cost per square foot for all facilities was applied. The impact of ranking of top ten counties was negligible.

**Data does not allow for any assumptions to be applied to account for facilities where no value was given.

Figure 87: Counties with State Facilities Exposed to >90 MPH Winds (Source: GHMS)⁶¹

⁶¹ (3/4/24) - <https://gema.georgia.gov/hazard-mitigation-planning>

Mitigation Needs – Economic Revitalization

Small Business Vulnerability and Employment Impact by Hazard Category

Many business establishments were severely impacted by the 2023-2024 Hurricanes, affecting employment levels across the state. The U.S. Bureau of Labor Statistics' Quarterly Census of Employment and Wages, third-quarter 2023 report, which includes the impact of Hurricane Idalia, 12,176 establishments were affected by the storm surge and flooding in multiple counties, including Bryan County (see figure below). The most recent data, updated on March 14, 2024, underscores the vulnerability of both employment and businesses to storms. The 2024 data, which will cover the impacts of Tropical Storm Debby and Hurricane Helene, is still awaited. The map below illustrates how employment was impacted in the hurricane storm surge flood zones based on the 2023 third-quarter data.

Additionally, the Georgia Department of Community Affairs (DCA) conducted both a public survey and a Unit of Local Government (UGLG) survey to assess the impact of Tropical Storm Debby and Hurricane Helene on businesses. The public survey revealed that many business owners, particularly those affected by Hurricane Helene, experienced significant losses, including damage to inventory and facilities that were not covered by insurance. This damage, which included buildings, equipment, and fences, hindered operations and prevented businesses from functioning at pre-disaster levels. For example, a hair salon had to close, resulting in financial strain for employees who were unable to work. Recovery has been slow, with funding being a significant barrier. The UGLG survey, conducted in February 2025, reported that in Valdosta, Lowndes County, 15 businesses had closed, and 6 are at risk of closing due to the storms.

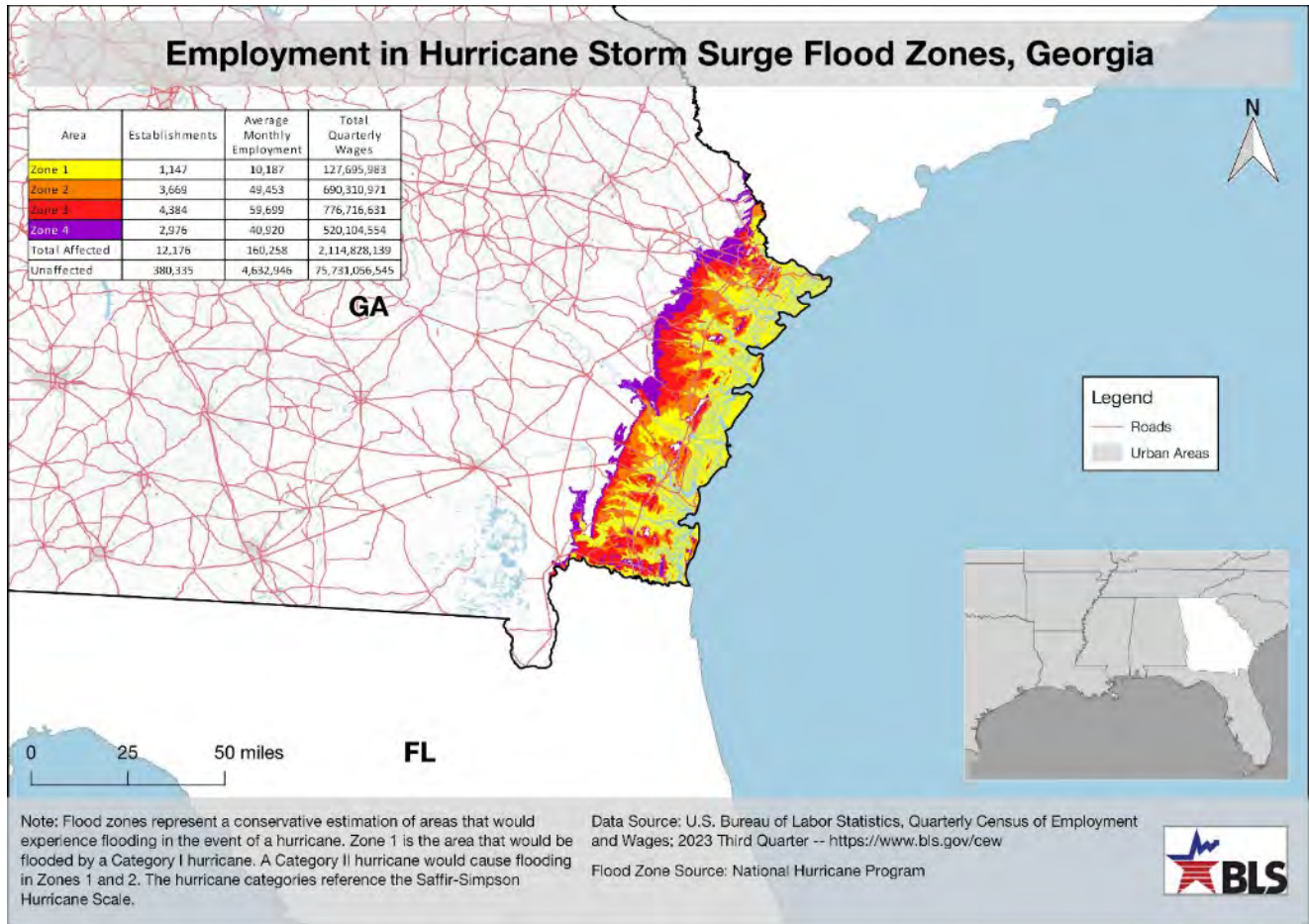


Figure 88: Employment in Hurricane Storm Surge Flood Zones (2023) (Source: Bureau of Labor Statistics)⁶²

3.3. Mitigation Needs Summary

Georgia’s highest risk hazards are Inland Flooding, Tornadoes, and Hurricane Wind. All three of these hazards inflicted significant impacts on the state in the 2023-2024 Hurricanes. By utilizing CDBG-DR funds to continue to integrate housing hazard mitigation strategies, drainage improvements, resilience planning, and other structural and non-structural mitigation activities into recovery efforts, Georgia is better preparing for future disasters, ensuring that communities not only recover but also build long-term resilience.

The Department of Community Affairs will continue to collaborate with GEMA and across state agencies and communities to ensure a coordinated approach to risk reduction and resilience building, especially in the most vulnerable areas. DCA remains committed to reducing risks and enhancing resilience across all sectors. The ongoing collaboration of state agencies, local communities, and organizations will ensure that mitigation strategies are not only effective but inclusive, prioritizing the safety and well-being of all residents, businesses, and communities, particularly those most at risk from future disasters.

⁶² <https://www.bls.gov/cew/publications/hurricane-flood-zones-maps/hurricane-maps.htm>

DCA plans to allocate mitigation set aside funds to the Housing Programs, the Infrastructure Program, and the HMGP Match Program. The table below demonstrates a mitigation need based on a percentage of the unmet needs calculated above.

Mitigation Needs Summary				
Mitigation Needs Assessment	Estimated Loss/Need (-)	Funding Awarded or Obligated (+)	Mitigation Need (=)	% of Mitigation Need
Housing Mitigation				
Housing Mitigation (15%)	\$165,378,330	\$0	\$165,378,330	
TOTAL - Housing	\$165,378,330	\$0	\$165,378,330	62%
Infrastructure Mitigation				
Permanent Work (Cat. C-G) 15%	\$68,990,288	\$0	\$68,990,288	
TOTAL - Infrastructure	\$68,990,288	\$0	\$68,990,288	26%
Economic Revitalization Mitigation				
Econ. Mitigation	\$31,617,281	\$0	\$31,617,281	
TOTAL - Econ. Revit.	\$31,617,281	\$0	\$31,617,281	12%
GRAND TOTAL	\$266,080,279	\$0	\$266,080,279	

Figure 89: Mitigation Set Aside

4. Fair Housing and Civil Rights Data Collection

This section discusses the demographic information sought by HUD to develop the fair housing and civil rights assessment as outlined in the Universal Notice. DCA reviewed this data to advance fairness and reduce barriers that individuals may face when applying for and accessing disaster recovery assistance.

Following major disasters, groups like minority populations, the elderly, people with disabilities, families with children, households with limited English proficiency, and those with lower income levels tend to face significantly greater challenges in recovering compared to the general population. This is often due to pre-existing vulnerabilities and barriers to accessing necessary support services. DCA strives to use this fair housing and civil rights data to inform equitable and holistic recovery.

In addition to the analysis in this section, the State's 5-Year Consolidated Plan describes actions the State takes to Affirmatively Further Fair Housing. DCA is committed to designing and providing programs that support its existing initiatives for fair housing that serves LMI populations, underserved communities, and vulnerable populations. DCA will take steps in accordance with the Fair Housing Act of 1968 to reduce disparities in housing choice, access, and opportunities based on protected class (e.g., race, color, religion, familial status, sex, national origin, or disability). DCA will work to eliminate disparities in the benefits of, different requirements for participation in, and other forms of discrimination in programs or activities receiving Federal financial assistance in accordance with Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Section 504 and 508 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act, and the Americans with Disabilities Act of 1990.

For the fair housing and civil rights assessment, DCA has collected and reviewed data for each of the groups listed below.

- Populations with Limited English Proficient (LEP) by language spoken;
- Persons belonging to protected classes;
- Persons belonging to protected classes by housing tenure (i.e., homeowner vs renter);
- Persons belonging to vulnerable populations;
- Persons belonging to historically distressed and underserved communities;
- Indigenous populations and tribal communities; and
- Racially or ethnically concentrated areas of poverty (R/ECAPs).

This information will guide DCA's planning decisions to support HUD's objectives to:

- Fairly benefit protected class groups;
- Overcome prior disinvestment in infrastructure and public services for protected class groups and areas in which residents belonging to such groups are concentrated; and
- Enhance the accessibility of disaster preparedness, resilience, or recovery services, including the accessibility of evacuation services and shelters; the provision of critical disaster-related information in accessible formats; and the availability of integrated, accessible housing and supportive services.

4.1. Populations with Limited English Proficient (LEP)

As a CDBG-DR grantee, DCA must take reasonable steps to ensure meaningful access to its programs and activities by Limited English Proficient (LEP) persons, members of protected classes, vulnerable populations, and individuals from other underserved communities, and address any possible digital differences and related barriers. DCA will take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking residents. DCA will ensure that its outreach, communication, and public engagement efforts are comprehensive and accessible to reach as many impacted citizens as possible. The map below reflects the percentage of each county’s population that is considered to have limited English proficiency.

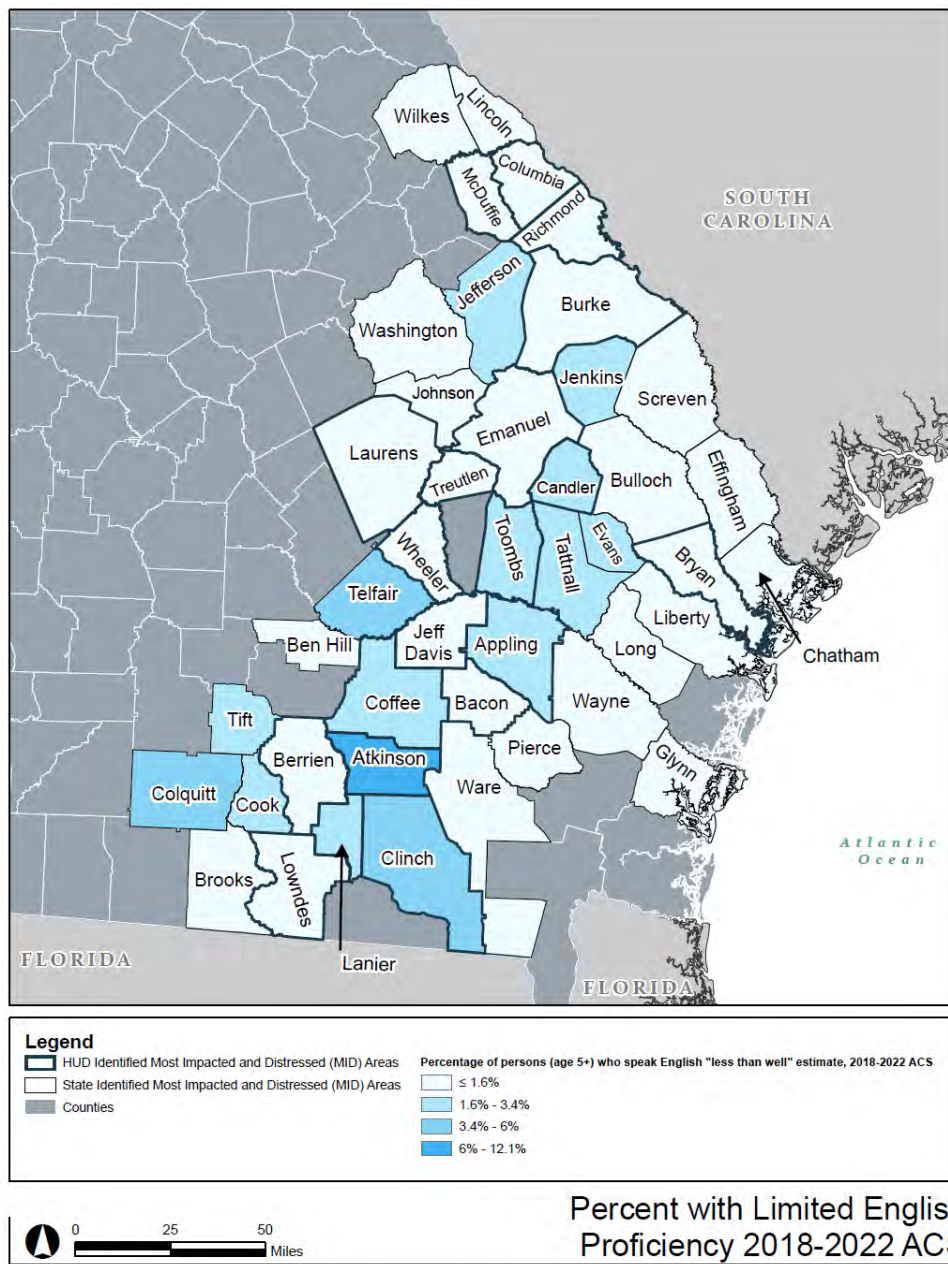


Figure 90: Persons with Limited English Proficiency Map

To identify any potential populations with limited English proficiency, DCA reviewed data for the 94 impacted counties. Eleven counties have 5% or more of their population that speak English less than “very well.” DCA also reviewed language specific data. Of the languages spoken in the counties, Spanish was the only language spoken by 5% or more of the population in households that speak English less than “very well.” The table below shows data for those counties.

Counties where 5% or More of Population, Speak English Less than "Very Well"		
County	Language Other than English, Speak English Less than "Very Well"	Spanish, Speak English Less than "Very Well"
Atkinson	11.10%	11.10%
Colquitt	8.20%	7.50%
Echols	11.70%	7.50%
Candler	6.60%	6.20%
Clinch	6.30%	5.90%
Coffee	6.10%	5.80%
Evans	6.00%	5.80%
Grady	5.70%	5.60%
Habersham	6.10%	4.80%
Jeff Davis	5.30%	5.20%
Toombs	5.50%	4.40%

Figure 91: 5% or More of Population, Speak English Less than “Very Well” (Source: Census)⁶³

This data identifies the need for language access services in Spanish, which is one of the languages DCA has been providing as part of their previous CDBG-DR grants and will continue to do so for these programs.

To ensure the accessibility of programs and services identified in the Action Plan, DCA will offer one or more of the following services to support persons with LEP:

- Notices to staff and recipients of the availability of LEP services
- Bilingual outreach and intake staff
- Oral interpretation for case management services
- Written translation of program materials such as outreach and marketing materials, program applications, forms, eligibility and award notices, contracts, and program guidelines
- Telephone service interpreter lines.

Additional information on language access can be found in the “Citizen Participation” Section of this Action Plan.

⁶³ (2023 5-year) - [https://data.census.gov/table/ACSDP1Y2022.DP02?q=040XX00US13\\$0500000](https://data.census.gov/table/ACSDP1Y2022.DP02?q=040XX00US13$0500000)

4.2. Persons Belonging to Protected Classes

DCA has compiled and analyzed data regarding protected classes to identify any disparities that may exist within the impacted counties. This information will assist DCA in developing strategies that promote fairness in the recovery process.

White/Caucasian is the majority of the racial population statewide as well as in the Combined MID counties, at 55.87 percent. The next largest racial population is Black/African American, which makes up 32.91 percent of the population of the MID areas. Other racial groups are minimally represented. The table below reflects the racial demographic makeup statewide, in the disaster declared counties, and in the MID areas.

Race by Statewide, Disaster Declaration, and MID Areas						
Demographics	Statewide Estimate	Statewide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Areas Estimate	MID Areas Percentage
Total Population	10,822,590	100.00%	4,176,505	100.00%	1,805,064	100.00%
White or Caucasian	5,677,531	52.46%	2,311,031	55.33%	1,008,439	55.87%
Black or African American	3,391,689	31.34%	1,354,152	32.42%	594,044	32.91%
American Indian and Alaska Native	42,058	0.39%	11,524	0.28%	5,291	0.29%
Asian	472,915	4.37%	126,770	3.04%	30,972	0.10%
Native Hawaiian and Other Pacific Islander	7,338	0.07%	2,668	0.06%	1,797	0.10%
Some Other Race	448,586	4.14%	117,051	2.80%	54,032	2.99%
Two or More Races	782,473	7.23%	253,309	6.07%	110,489	6.12%

Figure 92: Race by Statewide, Disaster Declaration, and MID Areas ⁶⁴

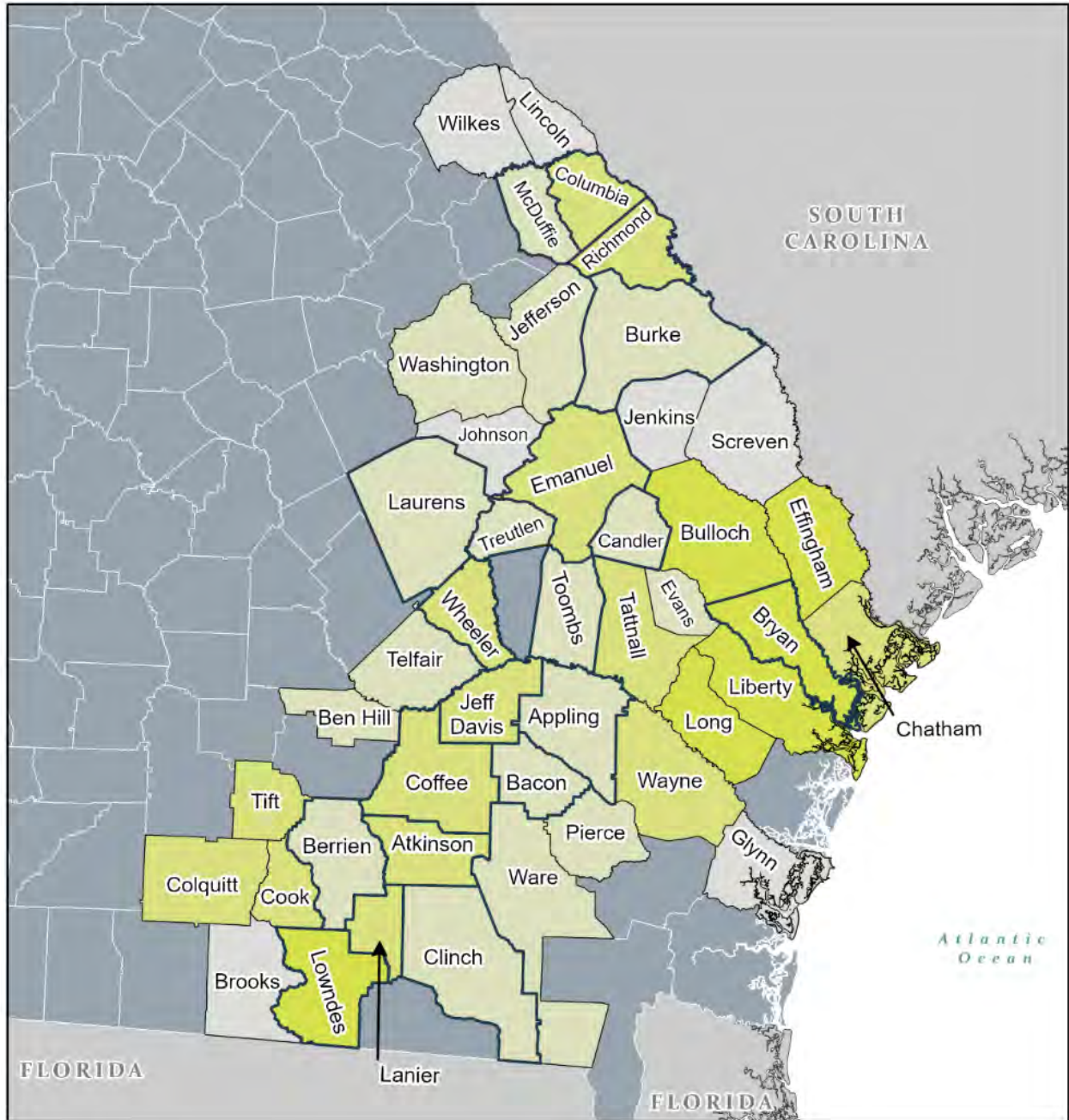
DCA also reviewed key age demographics. For key age demographics, the data showed there was a slightly higher percentage of persons under 5 and over 65 in the MID areas as compared to statewide. The table below reflects the age demographics statewide, in the disaster declared counties, and in the MID areas.

⁶⁴ <https://data.census.gov/table/ACSDP5Y2023.DP05?q=DP05&q=040XX00US13>

Key Age Demographics by Statewide, Disaster Declaration, and MID Areas						
Demographics	Statewide Estimate	Statewide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Areas Estimate	MID Areas Percentage
Total Population	10,822,590	100.00%	4,176,505	100.00%	1,805,064	100.00%
Under 5 years	639,111	5.91%	242,200	5.80%	112,017	6.21%
65 years and over	1,581,263	14.61%	642,340	15.38%	281,218	15.58%

Figure 93: Key Age Demographics by Statewide, Disaster Declaration, and MID Areas ⁶²

Age is a factor in disaster vulnerability, especially for older adults who are more likely to have mobility limitations, chronic health conditions, and suffer from social isolation. It is important to consider these populations when developing application materials and methods of application. For example, the requirement of an online application may be a barrier for elderly individuals. Efforts should be made to utilize applications by mail or in-person and to provide auxiliary aids (such as applications by phone) when needed. The map below reflects the percentage of the population that is considered elderly or aged 65 and older.



Legend

- HUD Identified Most Impacted and Distressed (MID) Areas
- State Identified Most Impacted and Distressed (MID) Areas
- Counties

Percent of Population that is 65 Years and Over

- 9.2% - 13%
- 13% - 16.4%
- 16.4% - 18.6%
- 18.6% - 25.2%



Percent of Elderly Population 2019-2023 ACS

Source: Esri, ArcGIS Living Atlas of the World, American Community Survey (ACS) 2019-2023

Figure 94: Elderly Population Map

DCA also reviewed disability status demographics. There was also a slightly higher percentage of the population with a disability in the MID areas compared to statewide. This is notable as individuals with a disability are more likely to experience higher poverty rates than those without a disability. The table below reflects the disability status demographics statewide, in the disaster declared counties, and in the MID areas.

Disability by Statewide, Disaster Declaration, and MID Areas						
Demographics	Statewide Estimate	Statewide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Areas Estimate	MID Areas Percentage
Total Population	10,822,590	100.00%	4,176,505	100.00%	1,805,064	100.00%
Population with a Disability	1,375,224	12.71%	579,814	13.88%	270,084	14.96%

Figure 95: Disability by Statewide, Disaster Declaration, and MID Areas⁶⁵

Efforts to increase accessibility to all materials and benefits should be made for disabled individuals. For example, public meetings should be physically accessible. Additionally, efforts should be made for housing projects to include accessible units if the need is identified. The map below reflects the percentage of the population for each MID county that has a disability.

⁶⁵ <https://data.census.gov/table/ACSST5Y2023.S1810?q=S1810&q=040XX00US13>

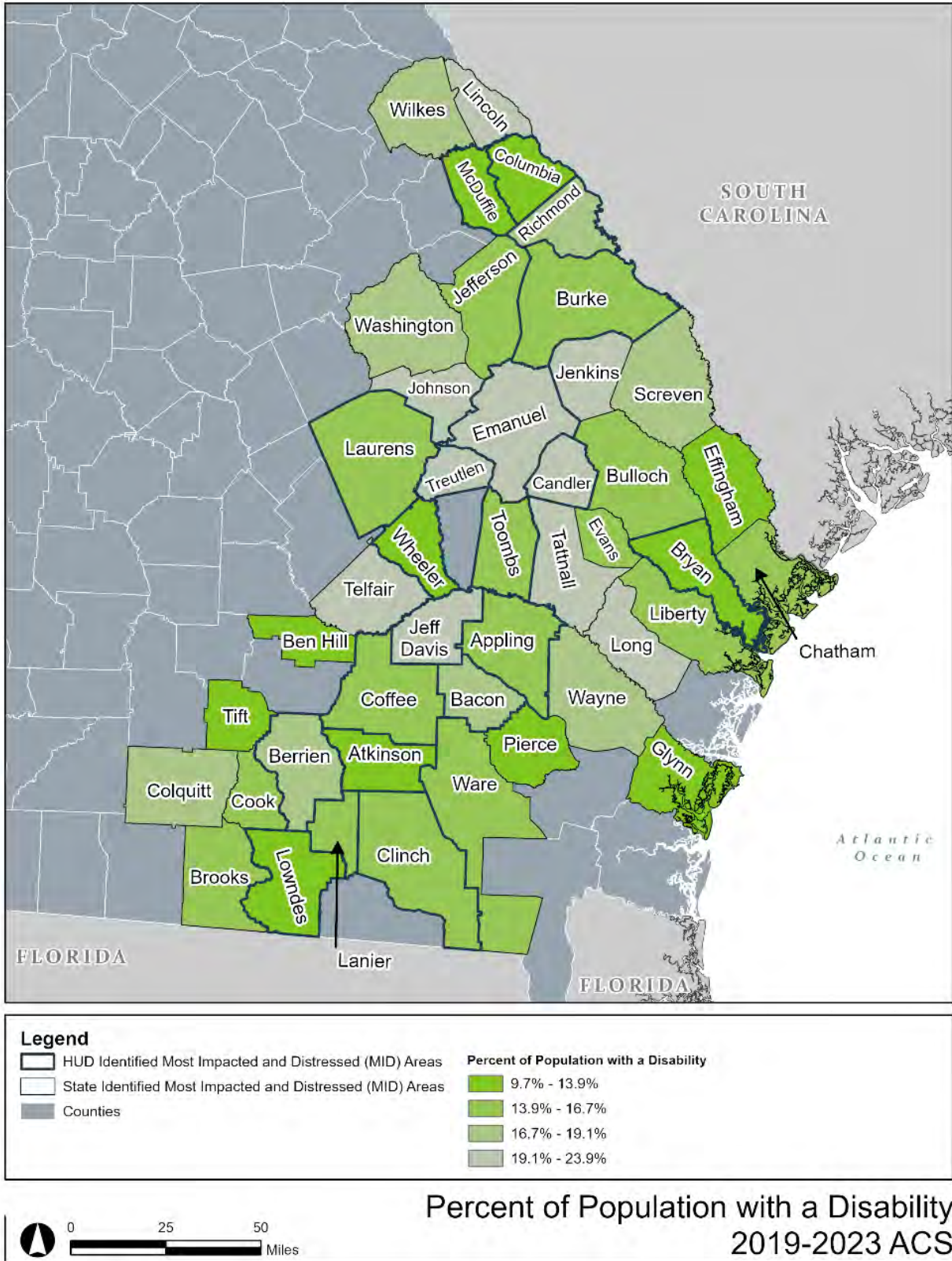


Figure 96: Individuals with a Disability Map

The table below reflects the sex demographics statewide, in the disaster declared counties, and in the MID areas.

Sex by Statewide, Disaster Declaration, and MID Areas						
Demographics	Statewide Estimate	Statewide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Areas Estimate	MID Areas Percentage
Total Population	10,822,590	100.00%	4,176,505	100.00%	1,805,064	100.00%
Male	5,281,762	48.80%	2,050,679	49.10%	887,984	49.19%
Female	5,540,828	51.20%	2,125,826	50.90%	917,080	50.81%

Figure 97: Sex by Statewide, Disaster Declaration, and MID Areas⁶⁶

Data on religious affiliation is not available by the county level. The Pew Research Center’s Religious Landscape Study⁶⁷ surveys more than 35,000 Americans in all 50 states about their religious affiliations, beliefs, and practices, along with their social and political views and demographic characteristics. The most recent survey was conducted in 2023-2024 and found that 67% of adults in Georgia identify as Christian, 7% as other religions, and 26% are religiously unaffiliated.

There is also incomplete or limited data on familial status or sexual identity at the county level. The data available from the 2023 ACS 1-year estimate indicates that in the state there are approximately 1.925 million married couple households. Of that, approximately 1.9 million are in opposite-sex marriages and 25,932 are in same-sex marriages.

Households with Children	
Married-Couple	737,680
Male, no spouse/partner	46,771
Female, no spouse/partner	253,784

Figure 98: Households with Children

Georgia has an average household size of 2.61 and an average family size of 3.21. 71% of households with a child under 18 years of age are in a married-couple household, and 24% are in a female household with no spouse or partner.⁶⁸

DCA also analyzed data on national origin. Within the disaster area, 7% of residents are foreign born, and within the MID areas, 5% of residents are foreign born. Of the 5% that are foreign born, the largest percentage, approximately 3%, are from Latin America, which is consistent with the disaster area as a whole.

⁶⁶ <https://data.census.gov/table/ACSDP5Y2023.DP05?q=DP05&q=040XX00US13>

⁶⁷ <https://www.pewresearch.org/religious-landscape-study/state/georgia/>

⁶⁸ <https://data.census.gov/table?q=familial+status&q=040XX00US13>

National Origin by Statewide, Disaster Declaration, and MID Areas						
Nation Origin	Statewide Estimate	Statewide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Areas Estimate	MID Areas Percentage
Total	10,822,590	100.0%	4,176,505	100.0%	1,805,064	100.0%
Native	9,650,102	89.2%	3,881,748	92.9%	1,712,940	94.9%
Foreign-Born	1,172,488	10.8%	294,757	7.1%	92,124	5.1%
Europe	92,452	0.9%	31,864	0.8%	11,053	0.6%
Asia	355,604	3.3%	99,185	2.4%	24,046	1.3%
Africa	125,045	1.2%	24,633	0.6%	4,459	0.2%
Oceania	3,880	0.0%	1,863	0.0%	903	0.1%
Latin America	576,535	5.3%	130,862	3.1%	49,648	2.8%
Northern America	18,940	0.2%	6,350	0.2%	2,015	0.1%

Figure 99: National Origin Demographics⁶⁹

DCA is dedicated to ensuring that recovery efforts do not discriminate against protected class groups and vulnerable populations.

4.3. Persons Belonging to Protected Classes by Housing Tenure

A household's housing tenure, whether they are homeowners or renters, significantly impacts their ability to recover from a disaster. Homeowners generally have a greater capacity to recover due to factors like equity building and more control over their property compared to renters who may face eviction or rent increases in the aftermath of a disaster. Approximately 63% of the population in the combined MID counties live in owner-occupied housing, which is slightly smaller than the statewide percentage.

Housing Tenure by Statewide, Disaster Declaration, and MID Areas						
Housing Tenure	Statewide Estimate	Statewide Percentage	Disaster Declaration Estimate	Disaster Declaration Percentage	MID Areas Estimate	MID Areas Percentage
Owner-Occupied	2,619,529	65.36%	1,014,558	63.68%	416,196	62.73%
Renter-Occupied	1,388,484	34.64%	578,689	36.32%	247,316	37.27%

Figure 100: Housing Tenure by Statewide, Disaster Declaration, and MID Areas⁷⁰

⁶⁹ [https://data.census.gov/table/ACSDP1Y2022.DP02?q=040XX00US13\\$0500000](https://data.census.gov/table/ACSDP1Y2022.DP02?q=040XX00US13$0500000)

⁷⁰ <https://data.census.gov/table/ACSDP5Y2023.DP04?q=dp04&q=040XX00US13>

4.4 Persons Belonging to Vulnerable Populations

HUD has defined vulnerable populations to be groups or communities whose circumstances present barriers to obtaining or understanding information or accessing resources, which may include: (1) persons at risk of or experiencing homelessness; (2) older adults; (3) persons with disabilities (mental, physical, developmental); (4) survivors of domestic violence, dating violence, sexual assault, or stalking; (5) persons with alcohol or other substance-use disorder; (6) persons with HIV/AIDS and their families; or (7) public housing residents.

While ACS data was not available to ascertain numbers and percentages for survivors of domestic violence, persons with alcohol or substance-abuse disorder, persons with HIV/AIDSs, persons experiencing homelessness, and public housing residents, DCA was able to use other sources to assess data that gave a snapshot of those populations.

Vulnerable Populations	
Persons Aged 65 years or Older	15.58% in MID Areas, 14.61% Statewide
Disabled	14.96% in MID Areas, 12.71% Statewide
Survivors of Domestic Violence, Dating Violence, Sexual Assault, or Stalking	In 2023, across the state: <ul style="list-style-type: none"> • 37,653 incidents of family violence reported • 163 domestic violence deaths • 21.2% decline in family violence incidents reported to law enforcement from 2019-2023 • 8% in crisis calls to Georgia’s certified agencies
Persons with Alcohol or Substance-Abuse Disorder	In 2021, across the state: <ul style="list-style-type: none"> • There were 2,390 drug overdose deaths. Of those, 71% were attributed to opioids and 57% to fentanyl • 15.1% of adults binge drink at least once per month
Persons with HIV/AIDS and their Families	<ul style="list-style-type: none"> • In 2023, across the state there were 9,000 adults and children living with HIV • The top 5 counties of new HIV diagnoses do not include any of the HUD MID counties
Public Housing Residents	<ul style="list-style-type: none"> • 52,075 public housing residents • 147 Public Housing Authorities (PHAs) • 75% racial minority residents • 32% elderly and disabled residents

Figure 101: Vulnerable Populations^{71 72 73 74 75}

⁷¹ <https://qcfv.georgia.gov/resources/data>

⁷² <https://dph.georgia.gov/stopopioidaddiction>

⁷³ <https://drugabusestatistics.org/alcohol-abuse-statistics/#georgia>

⁷⁴ <https://map.aidsvu.org/profiles/state/georgia/overview>

⁷⁵ https://www.hud.gov/program_offices/public_indian_housing/programs/ph/PH_Dashboard

Homelessness, 2022 Point in Time Count		
Geography	Total Homeless Count	Percent of Statewide Count
Statewide	10,689	100.00%
Disaster Declared Counties	3,781	35.37%
MID Areas	1,885	17.63%

Figure 102: Homelessness, 2022 Point in Time Count⁷⁶

Most of the homeless population statewide and in the MID areas are unsheltered. People experiencing homelessness are especially vulnerable during and after a disaster. They lack stable housing, may have limited access to support networks to evacuate and find shelter, and are not able to easily access information.

4.5 Persons Belonging to Historically Distressed and Underserved Communities

DCA evaluated data regarding potential historically distressed and underserved communities, such as those who may be included in areas designated as a Promise Zone, Opportunity Zone, Revitalization Area Strategies Designation, a tribal area, a Community Disaster Resilience Zone (CDRZ), or rural areas. Below is a summary of that evaluation. The discussion of indigenous populations and tribal areas is in the next section.

- Promise Zones⁷⁷:** Promise Zones are high poverty communities where the federal government partners with local leaders to increase economic activity, improve educational opportunities, leverage private investment, reduce violent crime, enhance public health and address other priorities identified by the community. There are 22 Promise Zones across the country. Atlanta is the only Promise Zone in Georgia, and it is not located in a MID area.
- Opportunity Zones⁷⁸:** Opportunity Zones are economically distressed communities, defined by individual census tract, nominated by America’s governors, and certified by the U.S. Secretary of the Treasury via delegation of that authority to the Internal Revenue Service. 31 of the 44 MID areas include Federal Opportunity Zones.

⁷⁶ <https://dca.georgia.gov/affordable-housing/homelessness-assistance/point-time-homeless-count>

⁷⁷ <https://www.hudexchange.info/programs/promise-zones/>

⁷⁸ <https://georgia-dca.maps.arcgis.com/apps/webappviewer/index.html?id=3e0a3b024d844437bd88d8069d7182a3>

MID Areas that include Federal Opportunity Zones					
Atkinson	Clinch	Evans	Liberty	Richmond	Ware
Ben Hill	Coffee	Glynn	Lincoln	Screven	Washington
Berrien	Colquitt	Jefferson	Long	Tattnall	Wayne
Burke	Cook	Jenkins	Lowndes	Telfair	Wilkes
Candler	Effingham	Johnson	McDuffie	Tift	
Chatham	Emanuel	Laurens	Pierce	Toombs	

Figure 103: MID Areas that include Federal Opportunity Zones

- Revitalization Area Strategies Designation⁷⁹:** The Revitalization Area Strategies (RAS) designation provides incentives to communities that implement comprehensive redevelopment activities for targeted areas in their city or county. As of October 2024, there are three active RAS in Georgia. One of them, the City of Douglas, is in Coffee County, which is a MID area.
- Community Disaster Resilience Zone (CDRZ)⁸⁰:** Community Disaster Resilience Zones aim to build and strengthen community resilience across the nation by driving federal, state, public, and private resources to the most at-risk and in-need communities. FEMA used a natural hazard risk assessment index to identify census tracts that are most at risk for the effects of natural hazards. Based on FEMA’s Community Disaster Resilience Zone map viewer, there are three MID areas that include CDRZs. Three census tracts are identified in Chatham, four in Liberty, and one in Wayne.
- Rural Areas⁸¹:** Rural areas are considered underserved communities. According to Georgia’s State Office of Rural Health, rural Georgians are less healthy than those living in urban areas, have a higher incidence of obesity, diabetes, heart disease, and cancer, and are more likely to be under-insured or uninsured. 120 of Georgia’s counties are identified as rural, which is defined as having a county population of less than 50,000. 37 of the 44 MID areas are rural counties. Bulloch, Chatham, Columbia, Effingham, Glynn, Lowndes, and Richmond are the seven that are not considered rural.

4.6 Indigenous Populations and Tribal Communities

Georgia is home to 42,058 American Indian and Alaska Native individuals, representing 0.4% of the total population.

The Georgia Council on American Indian Concerns was created by the Georgia General Assembly and is the only state entity specifically authorized to address the concerns of Georgia's American Indians. The Council identifies three State Recognized Tribes. They are the Georgia Tribe of Eastern Cherokee, Cherokee of Georgia Tribal Council, and Lower Muskogee Creek Tribe. None of the tribes are in a MID area, but they are in a disaster declared county.

⁷⁹ <https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbq/revitalization-area/ras>

⁸⁰ <https://experience.arcgis.com/experience/3fdfd0639ba0403e9414d05654449d32/page/Home>

⁸¹ <https://dch.georgia.gov/divisionsoffices/state-office-rural-health>

Georgia State Recognized Tribes		
Tribe	County	Number of Members
Georgia Tribe of Eastern Cherokee	Lumpkin	7,453
Cherokee of Georgia Tribal Council	Charlton	369
Lower Muskogee Creek Tribe	Grady	2,800

Figure 104: Georgia State Recognized Tribes⁸²

4.7 Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

R/ECAPs are defined as census tracts that contain a concentration of both poverty and minority population. R/ECAP tracts are those that have:

- a) Poverty rates exceeding 40 percent or exceeding three times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower; and
- b) A non-White population of 50 percent or more

DCA reviewed HUD’s Office of Policy Development and Research map and data to identify R/ECAPs across the state and in impacted areas. There are 36 R/ECAPs across 11 of the MID areas. The table below compares the numbers of R/ECAPs statewide, in the disaster declared counties, and in the MID areas.

R/ECAPs		
Geographic Area	Number of R/ECAPs	Percentage of State Total
Statewide	172	100.00%
Disaster Declaration Counties	88	51.16%
MID Areas	36	20.93%

Figure 105: R/ECAPs⁸³

⁸² <https://georgiaindiancouncil.com/>

⁸³ <https://hudgis-hud.opendata.arcgis.com/datasets/HUD::racially-or-ethnically-concentrated-areas-of-poverty-r-ecaps/explore>

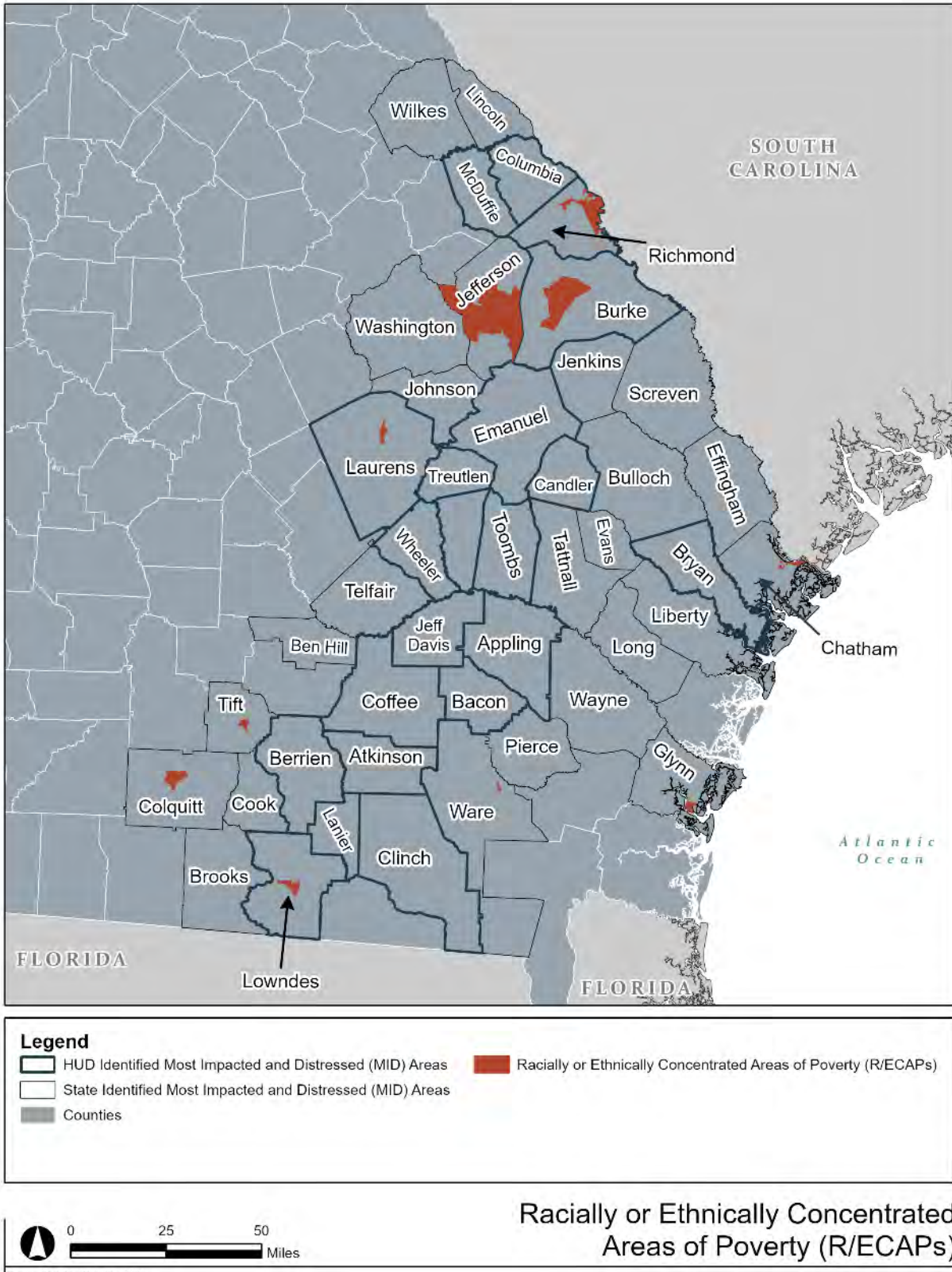


Figure 106: Racially or Ethnically Concentrated Areas of Poverty Map

The map above provides an overview of the R/ECAPs within the MID Areas.

When designing programs for the utilization of CDBG funds, these areas should be given special considerations. It is important to recognize the historical and social context of these areas when designing and implementing programs. For example, the ability to access program activities may be limited by the lack of access to transportation, childcare, and other services. These areas also have a smaller tax base, meaning public utilities and infrastructure projects may be underfunded and potentially deficient to support a successful recovery.

Program design should consider the historic divestment of these areas and identify potential infrastructure deficiencies. The intentional investment in these communities using CDBG-DR funds may assist in the redevelopment of previously blighted areas, aiding not only economic recovery but also fostering potential for growth. The investment in the increased resiliency of these areas can help otherwise historically underserved populations to recover and grow.

5. Connection Between Proposed Programs, Needs Assessments, Fair Housing, and Civil Rights Data

The Georgia Department of Community Affairs is the lead agency and responsible entity for administering the CDBG-DR Funds. DCA will administer recovery programs designed based on the required assessments, and funds will be allocated to programs according to the table below.

Funding Allocation					
Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grantee Identified MID	CDBG-DR Allocation Amount	% of CDBG-DR Allocation (Excluding the 15% Mitigation Set-Aside)
Administration (5% cap)				\$13,286,300	5%
Planning (15% cap)			100%	\$3,500,000	1.3%
Rental Housing	\$303,926,570	21%	100%	\$96,022,865	36.1%
Owner-Occupied Housing	\$798,595,631	55%	100%	\$92,916,835	30.3%
Infrastructure	\$179,355,554	12%	100%	\$60,000,000	14.2%
Economic Revitalization	\$178,276,598	12%	100%	\$0	0%
Public Services (15% cap)	\$0	0%	0%	\$0	0%
Exempt Public Services (no cap)	\$0	0%	0	\$0	0%
Total	\$1,460,154,354	100%	100%	\$265,726,000	87%

Figure 107: Funding Allocation

Based on the unmet needs analyses conducted for housing, infrastructure, and economic development outlined above, there is an overall estimated unmet recovery need of \$1,460,154,354, as shown previously in the Section “Unmet Needs Assessment.” Housing represents a majority of the overall unmet need, totaling \$1,102,522,201, or 76% of the total. The unmet housing need is nearly evenly split between homeowners (53%) and renters (47%) based on FEMA IHP Data. Owner-Occupied Housing in the table above includes all the SBA unmet needs since most of the applicants for SBA would be homeowners. DCA Infrastructure accounts for \$179,355,554 (12% of the total unmet need), while

Economic Revitalization represents \$178,276,598 (12%). Given the significant impact on housing and the corresponding unmet need, the State is prioritizing housing programs as the primary focus of funds.

The State's plan for meeting the unmet recovery needs in this CDBG-DR Action Plan includes the following:

- Single Family Homeowner Rehabilitation & Reconstruction Program (HRRP)
- Affordable Rental Housing Development Program
- Affordable Rental Rehabilitation Program (ARRP)
- Competitive Application Infrastructure Program
- HMGP Match Program
- Planning Program

The State's primary goal for housing efforts is to provide safe, disaster resistant housing to assist the most vulnerable residents impacted by the disaster with their recovery efforts in eligible areas and support the development of much needed affordable housing in the region. The housing projects/programs seek to address the housing needs of low-income, moderate-income, and vulnerable households as much as possible.

The Homeowner and Affordable Rental Rehabilitation Programs consist of rehabilitation, reconstruction, or replacement of existing or destroyed housing units within the MID areas. To promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening. There are additional details in each of the program descriptions in the section "Allocation, Award Caps, Funding Criteria."

The Affordable Rental Housing Development Program will facilitate the creation of quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by the storms. Given that rental units house a high percentage of underserved residents, this program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the disasters, as indicated in the unmet needs assessment.

The funding allocated to HRRP accounts for approximately 35% of the total CDBG-DR allocation, and the funding going towards the two rental programs totals approximately 36% of the total allocation.

In addition to housing programs, the data indicates considerable unmet needs in infrastructure, approximately 12% of the overall need. However, as stated previously, this analysis is only able to take into account currently available data and data on infrastructure needs is still being developed. It is expected that the unmet need for infrastructure will grow considerably as the State continues its recovery process. In order to fill the identified gap, the State plans to allocate CDBG-DR funding to address the needs in infrastructure through the Competitive Infrastructure Program and the HMGP MATCH Program, ensuring investments in resilient infrastructure improvements. Through the Infrastructure Program, DCA will encourage activities related to stormwater management in flood-prone areas and will promote the incorporation of resiliency measures in all projects. Similarly, the HMGP Match Program will support projects that include retrofits, elevation, and buyout activities, which will aid communities in their recovery efforts, as evidenced in the unmet needs assessment.

The funding allocated to the Infrastructure and HMGP Match Programs accounts for approximately 25% of the total allocation.

Due to the lack of available funding, the State does not plan to fund Economic Revitalization or Public Services activities at this time. The State will reconsider funding these activities should additional dollars become available. The State's decision to fund the programs outlined in this Action Plan is based on the data gathered and the unmet needs, mitigation needs, and Fair Housing assessments conducted.

Fair Housing Considerations

All housing projects/programs will be designed and managed to allow for participation by individuals and households throughout the community without discrimination or prejudice. This includes designing housing projects/programs that can provide specific housing accommodations, such as ADA improvements, for vulnerable populations, including individuals with disabilities and the elderly.

The programs described in this Action Plan seek to not only address current damages caused by the disasters but also mitigate potential future damage and provide a more stable supply of resilient housing stock to reduce future disruptions in the likely event of another disaster.

All projects will consider the needs and accommodations of specific protected classes and vulnerable populations. This will include accommodations, such as ADA improvements, for vulnerable populations, including individuals with disabilities and the elderly.

All programs and projects within this Action Plan were developed and considered by taking all individuals in the community into account. Those populations who may be at the greatest risk, may require additional services, or have additional obstacles and concerns to overcome were provided with additional analysis to possibly identify any disproportionate impacts or needs. According to the impact analysis and analysis of population specific data, there were no specifically identified vulnerable populations that were disproportionately impacted over other populations.

Displacement

To reduce the displacement of individuals and entities affected by the activities in this action plan, DCA will collaborate with relevant agencies and stakeholders to implement mitigation efforts. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, are met.

DCA will utilize HUD's publication of Planning and Budgeting Relocation Costs for HUD-Funded Projects as a guide when establishing standards involving relocation activities for program activities proposed under this allocation. This includes instituting extensive planning initiatives that consider the likelihood of displacement before the commencement of the project and establishes a resolution to reduce any undue burden and associated costs in connection. Program budgets identified during the planning phase will account for any relocation activities deemed necessary and reasonable in the uptake of the project. Program activities shall be planned and carried out in a manner that minimizes hardships and displacement of both homeowners and tenants of disaster-damaged residences to be rehabilitated, elevated, replaced, or reconstructed.

The State will provide detailed policies and procedures for proposed programs or projects that could potentially cause the displacement of people or other entities, and the State will follow their amended Residential Anti-displacement and Relocation Assistance Plan (RARAP) in accordance with URA requirements. CDBG-DR funds will not be used to support any federal, state, or local projects that seek to use the power of eminent domain unless eminent domain is employed only for public use.

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 proposed programs in this Action Plan will address displacement due to the disaster by providing new housing opportunities in compliance with the URA requirements.

5.1 Allocation, Award Caps, Funding Criteria

General Exception Criteria

The conditions for granting exceptions to the maximum award amounts will be detailed in program policy and will be limited to those instances in which additional funding is necessary to comply with federal accessibility standards or to reasonably accommodate persons with disabilities.

5.1.1 Administration

Grantee Administration Activities Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
Administration Total:	\$13,286,300	5%
Total	\$13,286,300	5%

Figure 108: Grantee Administration Activities Overview

The State will utilize 5 percent of the total grant award for administration, as allowed by the Universal Notice. Funding has been allocated to administration to fund the necessary costs of planning for, setting up, and managing the CDBG-DR recovery programs.

5.1.2 Planning

Grantee Planning Activities Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
GEMA DRRPs	TBD	TBD
Competitive Application	TBD	TBD
Planning Total:	\$3,500,000	1.3%
Total	\$3,500,000	1.3%

Figure 109: Grantee Planning Activities Overview

The State will utilize approximately 1.3% of its allocation to support planning activities in the MID areas. DCA encourages communities to consider post-disaster recovery planning, especially those in the Most Impacted and Distressed areas. This is an allowable expense under the planning allocation. This includes the development, adoption, and enforcement of modern and/or resilient building codes and mitigation of hazard risk, including possible sea level rise, high winds, storm surge, and flooding.

5.1.3 Housing

Grantee Housing Program Overview

Grantee Housing Programs Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Single-family Homeowner Rehabilitation and Reconstruction Program	\$92,916,835	70%
Affordable Rental Housing Development	\$20,000,000	100%
Affordable Rental Rehabilitation Program	\$76,022,865	70%
Housing Program Total:	\$188,939,700	73.2%
Total	\$188,939,700	73.2%

Figure 110: Grantee Housing Programs Overview

Single-family Homeowner Rehabilitation and Reconstruction Program

Program Title: Single-family Homeowner Rehabilitation and Reconstruction Program (HRRP)

Amount of CDBG-DR Funds Allocated to this Program: \$92,916,835

Eligible Activity(ies): 42 USC 5305(a)(4) - Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing; 90 FR 1754 III.D.5 – Universal Notice Housing Activities and Standards.

National Objective: Benefit to low- and moderate-income persons and Urgent Need (81-120% AMI).

Lead Agency and Distribution Model: DCA will administer the program directly with the services of a prime vendor.

Program Description: This program is designed to meet housing needs identified in the unmet needs assessment. It will provide safe, disaster resistant housing to assist the most vulnerable residents impacted by the disaster with their recovery efforts in eligible areas. This is critical to the long-term recovery strategies for these communities. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. In order to promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening. The program also includes Temporary Relocation Assistance based on individual household needs and their participation in HRRP to be awarded on a case-by-case basis. This housing program will address the owner-occupied housing needs.

HRRP is estimated to serve 400 households with a proposed start and end date of October 01, 2025 – October 01, 2029.

Eligible Geographic Areas: HUD-identified MIDs receiving 80 percent of funds and/or grantee-identified MID areas receiving 20 percent of funds may benefit from this program.

Other Eligibility Criteria:

Applicant Criteria:

All applicant homeowners will be held to the following criteria as conditions of eligibility. This is not an exhaustive list. A comprehensive list will be provided in the program policies and procedures.

- Must be a primary resident homeowner; no second homes are allowed.
- A control measure will be 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 percent of the Average Median Income may qualify for 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 based on LMI status (household income equal to or less than 80% AMI) for the first 45 days of the application period.

Secondary preference will be given to households under the Urgent Need National Objective with one or more of the following characteristics: households with members 62 and older, households with children under the age of 18, and households with special needs or special accommodation requirements (disabled). The State believes that these considerations create a fair prioritization system and serves the spirit and fact of AFFH.

LMI applicants will be prioritized in the initial 45 days. DCA will accept applications from non-prioritized applicants when the application period opens but will not be processed until after the initial 45 days.

Additional funding criteria will be disclosed in applicable program policies and procedures.

Maximum Amount of Assistance Per Beneficiary: This amount will be established in applicable program policies and procedures.

Maximum Income of Beneficiary: 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 with incomes greater than 80% and less than 120% will be served under the Urgent Need objective.

Mitigation Measures: The mitigation set-aside will be incorporated into housing projects.

Reducing Barriers to Assistance: DCA utilized community engagement meetings, stakeholder collaboration, and the collection and interpretation of relevant data to identify and reduce barriers to accessing assistance. The result of these efforts led to the following implementations:

- Income limits for applicants.
- Application prioritization for vulnerable populations.
- Avoiding unjustified impediments by providing guidelines to ensure equitable outreach and marketing measures for the purposes of community specific outreach.
- Accessible construction standards to accommodate the specific needs of an individual with a disability.
- Allowance of multiple housing configurations (bedrooms & bathrooms) to ensure that housing is sized appropriately for the household.

Affordable Rental Housing Development Program

Program Title: Affordable Rental Housing Development Program

Amount of CDBG-DR Funds Allocated to this Program: \$20,000,000

Eligible Activity(ies): 42 USC 5305(a)(4) - Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing; 90 FR 1754 III.D.3 – Mitigation Measures; 90 FR 1754 III.D.4 – Mitigation Activities; 90 FR 1754 III.D.5 – Universal Notice Housing Activities and Standards

National Objective: Benefit to low- and moderate-income persons and Urgent Need (81-120% AMI).

Lead Agency and Distribution Model: DCA will be administering the Affordable Rental Housing Development Program directly.

Program Description: The program's eligible activities will include the rehabilitation of existing affordable rental housing or the construction of new rental housing units in areas impacted by the disasters. The Affordable Rental Housing Development Program will facilitate the creation of quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by the storms. Given that rental units house a high percentage of underserved residents, this program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the disasters, as indicated in the unmet needs assessment. The provision of safe, disaster resistant housing for residents impacted by the 2023-2024 Hurricanes is critical to the long-term recovery strategies of those eligible communities. To have the greatest impact and achieve maximum leverage of the Low-Income Housing Tax Credit (LIHTC), projects eligible for LIHTC will be given priority. This housing program will address the renter-occupied housing needs.

The program is estimated to serve 500 households with a proposed start and end date of July 01, 2026 – July 01, 2029.

Eligible Geographic Areas: HUD-identified MIDs receiving 80 percent of funds and/or grantee-identified MID areas receiving 20 percent of funds may benefit from this program.

Other Eligibility Criteria:

1. The project must be located within a HUD-identified MID or state-identified MID
2. If any choice-limiting actions have occurred, the application would be considered ineligible.

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.

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: At least 40 percent of the units must 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- and 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 include households with members 62 and older; households with children under the age of 18; and households having accessibility needs or individuals with documented disabilities.

Additional funding criteria will be disclosed in applicable program policies and procedures.

Maximum Amount of Assistance Per Beneficiary: Award caps will be established in applicable program policies and procedures.

Maximum Income of Beneficiary: 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 with incomes greater than 80% and less than 120% will be served under the Urgent Need objective.

Mitigation Measures: The mitigation set-aside will be incorporated into housing projects.

Reducing Barriers for Assistance: DCA utilized community engagement meetings, stakeholder collaboration and the collection and interpretation of relevant data to identify and reduce barriers in accessing assistance. The result of these efforts led to the following implementations:

- Income limits for tenants.
- Leasing priority for vulnerable populations.
- Avoiding unjustified impediments by providing guidelines to ensure equitable outreach and marketing measures for the purposes of community specific outreach.
- Accessible construction standards to accommodate the specific needs of an individual with a disability.
- Allowance of multiple housing configurations (bedrooms & bathrooms) to ensure that housing is sized appropriately for the household.

Affordable Rental Rehabilitation Program

Program Title: Affordable Rental Rehabilitation Program

Amount of CDBG-DR Funds Allocated to this Program: \$76,022,865

Eligible Activity(ies): 42 USC 5305(a)(4) - Clearance, Rehabilitation, Reconstruction and Construction of Buildings, including housing; 90 FR 1754 III.D.3 – Mitigation Measures; 90 FR 1754 III.D.4 – Mitigation Activities; 90 FR 1754 III.D.5 – Universal Notice Housing Activities and Standards

National Objective: Benefit to low- and moderate-income persons.

Lead Agency and Distribution Model: DCA will administer the program directly with the services of a prime vendor.

Program Description: ARRP is designed to meet housing needs identified in the unmet needs assessment. This consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. The program will provide safe, disaster resistant housing to assist the most vulnerable residents in their recovery efforts which is critical to the long-term recovery strategies of eligible areas. These eligible activities will include rehabilitation of existing rental housing units impacted by the disaster. To promote long-term recovery and limit damage from future disasters, this program may include mitigation measures, including elevation and home hardening. This housing program will address the renter-occupied housing needs.

AARP is estimated to serve 300 households with a proposed start and end date of January 01, 2026 – January 01, 2030.

Eligible Geographic Areas: HUD-identified MIDs receiving 80 percent of funds and/or grantee-identified MID areas receiving 20 percent of funds may benefit from this program.

Other Eligibility Criteria: Second homes will not be eligible for the program. Additional funding criteria will be disclosed in applicable program policies and procedures.

Maximum Amount of Assistance Per Beneficiary: Award caps will be established in applicable program policies and procedures.

Maximum Income of Beneficiary: HUD’s income limits for 80 percent AMI will be used in the Affordable Rental Rehabilitation Program to determine low- and moderate- income status for tenants.

Mitigation Measures: The mitigation set-aside will be incorporated into housing projects.

Reducing Barriers for Assistance: DCA utilized community engagement meetings, stakeholder collaboration and the collection and interpretation of relevant data to identify and reduce barriers in accessing assistance. The result of these efforts led to the following implementations:

- Income limits for tenants.
- Leasing priority for vulnerable populations.
- Avoiding unjustified impediments by providing guidelines to ensure equitable outreach and marketing measures for the purposes of community specific outreach.
- Accessible construction standards to accommodate the specific needs of an individual with a disability.
- Allowance of multiple housing configurations (bedrooms & bathrooms) to ensure that housing is sized appropriately for the household.

5.1.4 Infrastructure

Infrastructure Programs Overview

Grantee Infrastructure Programs Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Competitive Application Infrastructure Program	\$50,000,000	70%
Infrastructure Program Total:	\$50,000,000	70%
Total	\$50,000,000	70%

Figure 111: Grantee Infrastructure Programs Overview

Competitive Application Infrastructure Program

Program Title: Competitive Application Infrastructure Program

Amount of CDBG-DR Funds Allocated to this Program: \$50,000,000

Eligible Activity(ies): 42 USC 5305 sections: (a)(1) – Acquisition of Real Property; (a)(2) – Public Facilities and Improvements; (a)(4) – Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing); (a)(5) – Removal of Barriers; 90 FR 1754 III.D.3 – Mitigation Measures; 90 FR 1754 III.D.4 – Mitigation Activities.

National Objective: Benefit to low- and moderate-income persons and Urgent Need (81-120% AMI).

Lead Agency and Distribution Model: DCA will administer the program utilizing subrecipients (local governments, nonprofits, etc.).

Program Description: The goal of the CDBG-DR Infrastructure Program is to fund infrastructure projects in communities impacted by the 2023-2024 Hurricanes as identified in the unmet needs assessment. 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 stormwater management in flood-impacted areas. Specifically, DCA will work with the MID areas directly to identify unmet needs and associated costs of needed stormwater infrastructure. DCA will rely on professional engineers, procured by the sub recipients, to employ adaptable and reliable technologies to guard against premature obsolescence of infrastructure and ensure that the construction or rehabilitation of stormwater 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. DCA will encourage applicants to incorporate resiliency measures into the projects.

Additionally, DCA may issue direct allocations if there are remaining funds available after fully funding the Competitive Application Infrastructure Program.

Infrastructure is estimated to serve 4,500 individuals with a proposed start and end date of January 01, 2026 – January 01, 2030.

Eligible Geographic Areas: HUD-identified MIDs receiving 80 percent of funds and/or grantee-identified MID areas receiving 20 percent of funds may benefit from this program.

Other Eligibility Criteria:

The following criteria are required for eligibility:

- The project must be located within a HUD-identified MID or state-identified MID
- If any choice-limiting actions have occurred, the application would be considered ineligible.
- Award will be calculated based on identification of need and a duplication of benefit analysis
- 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.

Additional funding criteria will be disclosed in the applicable program policies and procedures.

Maximum Amount of Assistance Per Beneficiary: Award caps will be established in applicable program policies and procedures.

Maximum Income of Beneficiary: 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 with incomes greater than 80% and less than 120% will be served under the Urgent Need objective.

Mitigation Measures: The mitigation set-aside will be incorporated into infrastructure projects.

Reducing Barriers for Assistance: DCA utilized community engagement meetings, stakeholder collaboration and the collection and interpretation of relevant data to identify and reduce barriers in accessing assistance. The result of these efforts led to the following implementations:

- Factor in the proposed project’s effect on protected classes, vulnerable populations, and underserved communities when scoring applications.
- Avoiding unjustified impediments by providing guidelines to ensure equitable outreach and marketing measures for the purposes of community specific outreach.

Accessible construction standards to accommodate the specific needs of individuals with a disability.

5.1.5 HMGP Match Activities

HMGP Match Overview

Grantee HMGP Match Programs Overview		
Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
HMGP Match	\$10,000,000	100%
HMGP Match Program Total:	\$10,000,000	100%
Total	\$10,000,000	100%

Figure 112: Grantee HMGP Match Programs Overview

HMGP Match Program

Program Title: HMGP Match Program

Amount of CDBG-DR Funds Allocated to this Program: \$10,000,000

Eligible Activity(ies): 42 USC 5305 (a)(9) – payment of the non-federal share

National Objective: Benefit to low- and moderate-income persons.

Lead Agency and Distribution Model: DCA will be administering the Hazard Mitigation Grant Program (HMGP) directly.

Program Description: HMGP will assist local governments with their portion of the required HMGP match for housing and infrastructure related projects with a tie-back to the disaster. These projects include retrofits, elevation, and buyout activities, which will aid communities in their recovery efforts, as evidenced in the unmet needs assessment. The disaster events of 2023 and 2024 weakened revenues within these communities, which were needed to pay the local match, causing community recovery efforts to stall. By encouraging local governments to use CDBG-DR as a match for the FEMA Hazard Mitigation Grant Program, communities will be able to better utilize this funding source, as often local governments cannot afford a match for the HMGP program.

HMGP requires a 25% non-federal match; the Georgia Emergency Management and Homeland Security Agency (GEMA) covers 10% of this match, and the local governments are responsible for the remaining 15%. These funds will cover a portion of the remaining 15% match requirement but will not support the full 15%. Applicants will be required to submit applications to the Georgia Emergency Management Division. These match funding activities will meet CDBG-DR and HMGP eligibility requirements.

The HMGP program is estimated to serve 400 applicants with a proposed start and end date of January 01, 2026 – January 01, 2030.

Eligible Geographic Areas: HUD-identified MIDs receiving 80 percent of funds and/or grantee-identified MID areas receiving 20 percent of funds may benefit from this program.

Other Eligibility Criteria: Mixed-financed projects may come with different requirements, and the most restrictive requirements must be followed.

Additional funding criteria and ineligible activities will be disclosed in the applicable program policies and procedures.

Maximum Amount of Assistance Per Beneficiary: Awards will be capped at 15% of the required local government match.

Maximum Income of Beneficiary: HUD's income limits for 80 percent AMI will be used in the HMGP Program to determine low- and moderate- income status for applicants.

Mitigation Measures: The mitigation set-aside is incorporated into the HMGP match funds.

Reducing Barriers for Assistance: DCA utilized community engagement meetings, stakeholder collaboration and the collection and interpretation of relevant data to identify and reduce barriers in accessing assistance. The result of these efforts led to the following implementations, which will be further explained in program policies and procedures:

- Avoiding unjustified impediments by providing guidelines to ensure equitable outreach and marketing measures for the purposes of community specific outreach.
- Accessible construction standards to accommodate the specific needs of an individual with a disability.
- Allowance of multiple housing configurations (bedrooms & bathrooms) to ensure that housing is sized appropriately for the household.

5.1.6 Public Services

DCA will not be administering any Public Services programs. DCA may reconsider the feasibility of conducting Public Services programs provided the emergence of additional funds and/or compelling evidence that suggests the need to shift or reevaluate priorities depending upon the unmet need.

5.1.7 CDBG-DR Mitigation Set-Aside

As outlined in the previous program design sections, DCA plans to incorporate mitigation measures, supported by the mitigation set-aside, in the Housing Programs, the Infrastructure program, and the HMGP Match Program. The mitigation set-aside funds will be administered directly by DCA for the Housing programs and the HMGP Match Program and by subrecipients for the Infrastructure program.

6. General Information

6.1 Citizen Participation

The Georgia Department of Community Affairs (DCA) encourages robust citizen participation in the Action Plan development and amendment processes with a particular focus on ensuring meaningful engagement with LMI citizens and protected classes.

DCA will advertise opportunities for engagement in the process and comment on the Action Plan through various state and local resources. Additionally, DCA will work with Regional Commissions throughout the State for support in ensuring all citizens who are interested in participating are informed about opportunities for engagement. DCA will also post the full Citizen Participation Plan to the GA DCA CDBG-DR [website](#).

Consultation in the Development of the Action Plan

In the development of this disaster recovery action plan, DCA consulted with disaster-affected citizens, stakeholders, local governments, public housing authorities, key staff and elected officials of local governments, development authorities, emergency management agencies, regional commissions, and other affected parties in the surrounding geographic area to ensure comprehensive disaster impacts were identified in the plan, and that the plan and planning process were comprehensive and inclusive.

DCA recognizes that affected stakeholders are the center of and partners in the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through multiple communication outlets, including a series of stakeholder engagement meetings held prior to the development of the draft Action Plan in 10 counties across the impacted areas of the state. Each public meeting included a short presentation on the CDBG-DR grant program. This presentation includes an overview of HUD allocations, a timeline of the disaster and potential assistance activities, and an overview of MID and potential MID areas.

All communities and citizens were encouraged to share any relevant information related to the 2023-2024 Hurricanes with DCA in person and through an online survey that was widely advertised. The goal

of this initial round of outreach was to obtain pertinent information that helped further the development of this action plan.

The schedule of public meetings is on the following page.

Schedule of Meetings (2/10/25- 2/27/25)			
Date	Time	County	Location Address
2/10/2025	9 am - 12 noon	Butts	Butts County Administration Building 625 W. 3rd Street Jackson, GA 30233 Room: Courtroom B
2/11/2025	1 pm - 4 pm	Stephens	Stephens County Courthouse 37 W. Tugaloo Street Toccoa, GA 30577 Room: Historic Courtroom
2/12/2025	1 pm - 4 pm	Richmond	CSRA Regional Commission 3626 Walton Way Extension, #300 Augusta, GA 30909 Room: TBD
2/13/2025	9 am - 12 noon	Laurens	Laurens County Commissioners Office 117 E. Jackson Street Dublin, GA 31021 Room: Commissioners Meeting Room
2/18/2025	1:30 pm - 4:30 pm	Toombs	Center for Rural Entrepreneurship 208 East First Street Vidalia, GA 30474 Room: Dot Foods Business Hub (2nd floor)
2/19/2025	9 am - 12 noon	Bryan	J. Dixon Harn Community Center 91 Lanier Street Pembroke, GA 31321 Room: TBD
2/20/2025	1 pm - 4 pm	Coffee	Douglas-Coffee Chamber of Commerce 114 N. Peterson Avenue, Suite 205 Douglas, GA 31533 Room: TBD
2/25/2025	1 pm - 4 pm	Lowndes	Southern Georgia Regional Commission 1937 Carlton Adams Drive Valdosta, GA 31601 Room: TBD
2/26/2025	9 am - 12 noon	Camden	Camden County Resiliency Operations Center 135 Gross Road Kingsland, GA 31548 Room: TBD
2/27/2025	9 am - 12 noon	Wayne	Coastal Pines Technical College - Jesup 1777 W. Cherry Street Jesup, GA 31545 Room: TBD

Figure 113: Schedule of Public Meetings

Additional Consultation

In compliance with Section III.A.6.a of the Universal Notice, DCA plans to consult with Citizen Advisory Groups for key program decisions on at least an annual basis. These Citizen Advisory Groups will reflect the community demographics most affected by CDBG-DR-funded activities.

A Letter of Solicitation will be circulated within the affected communities to gauge interest in participation and collect information on potential representatives.

The Citizen Advisory Group may consist of members selected from the identified MID Area as well as interested delegates from the following entities: Association County Commissioners of Georgia, Carl Vinson Institute of Government, Georgia Municipal Association, and the Georgia Chamber of Commerce.

Public Comment

After the draft Action Plan is published, DCA will provide a 30-day time frame for public comments. The anticipated public comment period is March 19, 2025 – April 19, 2025. The Action Plan is anticipated to be submitted to HUD on April 21, 2025, along with all comments received and DCA's responses.

The draft Action Plan will be published on the DCA CDBG-DR website. The Disaster Recovery Website is located at: [Community Development Block Grant Disaster Recovery Program \(CDBG-DR\) | Georgia Department of Community Affairs](#).

For those who cannot access the draft Action Plan online, a copy will be available in person at DCA Headquarters.

Comments on the Action Plan can be received via email at CDBG-DR@dca.ga.gov.

Comments can also be received via mail at:

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

Comments can also be received in person at public hearings. The planned schedule of public hearings is on the next page.

Public Hearings			
Date	Time	County	Location
4/1/2025	9am – 10:30am	Lowndes	Southern Georgia Regional Commission 1937 Carlton Adams Drive Valdosta, GA 31601 Room: TBD
4/1/2025	3pm – 4:30pm	Coffee	Douglas-Coffee Chamber of Commerce 114 N. Peterson Avenue, Suite 205 Douglas, GA 31533 Room: TBD
4/2/2025	9am – 10:30am	Bryan	J. Dixon Harn Community Center 91 Lanier Street Pembroke, GA 31321 Room: TBD
4/2/2025	3pm – 4:30pm	Toombs	Center for Rural Entrepreneurship 208 East First Street Vidalia, GA 30474 Room: Dot Foods Business Hub (2nd floor)
4/3/2025	9am – 10:30am	Laurens	Laurens County Commissioners Office 117 E. Jackson Street Dublin, GA 31021 Room: Commissioners Meeting Room
4/8/2025	9:30 – 11:00am	Richmond	CSRA Regional Commission 3626 Walton Way Extension, #300 Augusta, GA 30909 Room: TBD

Figure 114: Public Hearings Schedule

Any updates or changes to the Action Plan in response to public comments will be clearly identified within the Action Plan. The updated Action Plan will include a summary of comments and DCA’s response to each comment. DCA’s response will be substantial in nature.

This same public comment period and process will apply to all Substantial Amendments.

Public Hearings

Since the amount of funds allocated to the State of Georgia falls between \$100 million and \$500 million, the State is required to hold two public meetings in the MID areas. To ensure as many citizens as possible can participate in these meetings DCA plans to hold six public hearings in the MID counties. DCA will hold meetings at times and locations that are convenient to potential and actual beneficiaries. DCA will provide accommodations to individuals with disabilities and ensure effective communication for individuals with disabilities. All meetings will be hybrid (in-person and virtual) to increase access.

The in-person meetings will include a virtual option to help reduce barriers, such as childcare needs and lack of transportation access, that can limit certain populations or communities from participating in public hearings, providing comments, or other engagement events or techniques.

DCA will work with local governments and regional commissions in the MID areas to identify the location of the public hearings, and all information will be advertised through multiple channels.

The public hearings provide citizens and all impacted stakeholders an opportunity to learn more about the planned CDBG-DR recovery programs and an opportunity to offer input on the Action Plan. In addition to offering in person comments at public hearings, DCA will accept written comments online as described above. Each of these hearings will be conducted in accordance with the standards outlined in the Universal Notice, including geographic balance, physical accessibility, alternative methods of information delivery, convenient times and locations, accommodations for persons with disabilities, and access for persons with LEP.

DCA plans to hold in-person meetings with a virtual option to attend in the following counties: Richmond, Laurens, Toombs, Bryan, Coffee, and Lowndes. Once the date and times are finalized, the information will be distributed to all interested parties as described above.

Document Publication and Website Requirements

DCA will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, Action Plan amendments, program policies and procedures, performance reports, citizen participation requirements, activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

As required in Section III.B.8 of the Universal Notice, DCA will publish all relevant program documentation on the Disaster Recovery Website. The Disaster Recovery Website is located at: <https://dca.georgia.gov/financing-tools/disaster-relief/community-development-block-grant-disaster-recovery-program-cdbq-dr>.

The documents that will be published include: the Action Plan and all amendments; all performance reports; The Citizen Participation Plan, all procurement policies and procedures, all program-specific policies and procedures, including a projection of expenditures and outcomes; and all contracts (as defined in 2 CFR 200.22) that will be paid using CDBG-DR funds.

The publication of all relevant program documentation will allow for robust citizen participation and full transparency into CDBG-DR funded activities. These documents will be available in a form accessible to persons with disabilities and those with lower English proficiency (LEP).

The Disaster Recovery Website is accessible to persons with disabilities and individuals with LEP in compliance with Section 504, Title II of the Americans with Disabilities Act, 17 Title VI, Executive Order 13166, and Section 508 of the Rehabilitation Act of 1973.

Citizen Complaints

Concerned Citizens can submit complaints through the CDBG-DR email at CDBG-DR@dca.ga.gov or via mail at:

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

DCA aims to reply to all complaints within 15 days of receipt. If a reply takes longer than 15 days, DCA will document the reason for the delay.

Complaints regarding Fraud, Waste and Abuse will be reported to the Georgia Office of the Inspector General (OIG) (866-435-7644) for investigation. This information is posted publicly on the disaster recovery website.

Additionally, complaints regarding potential Fraud, Waste, and Abuse will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

Disability and Language Access

Language Access

In compliance with 24 CFR Part 1, DCA is committed to providing meaningful access to LEP persons.

Individuals with lower English proficiency may be entitled to individual language assistance for all activities, benefits, and program communications. This will occur through the use of translation services. At request, live translation will be provided for direct encounters. For documents and written communication, materials will be provided in the requested native language.

If a significant number of non-English speakers can be reasonably expected to participate in a public meeting or public comment period, the following accommodations can be made upon request:

- Distributed materials translated into the requested language
- Citizen comments in a language other than English will be translated
- Live translation options available

As the anticipated language need for the identified counties is Spanish, the Action Plan and any amendments (both substantial and non-substantial) will be translated into Spanish and uploaded to the Disaster Recovery Website. The Website can be translated into many languages, including Spanish.

Program staff have access to three contracted translation services (see table below) that can provide interpretation in an applicant's native language or an accessible format.

Disability Access

All meetings will be held in locations accessible to individuals with disabilities. Where physical accessibility is not achievable, DCA will prioritize alternative methods of information delivery that offer access to individuals with disabilities in the most integrated setting possible. As needed, DCA will utilize auxiliary aids and services to enhance accessibility and equitable access.

Interpreter Services				
Provider	Services Provided	Phone	Email	Website
Interpreters Unlimited	In person Interpretation: Region 3	800-726-9891	N/A	N/A
LionBridge Technologies	Telephonic Interpretation: Statewide	978-964-9550 (Account set up) 800-444-6627	N/A	N/A
Ad Astra	Spoken Language Interpreting: In person Region 1,2,4,5	301-408-4242 - option 2 202-302-3378 Nights/weekends/ holidays	intergreting@ad-astrainc.com	www.scheduleinterpreter.com/ad-astra
	Document Translation: statewide	3012-408-4242 - option 4	Translation@ad-astrainc.com	https://portal.ad-astra.com/pagesUTF8/login.jsq
	Deaf and Hard of Hearing Services	301-408-4242 - option 3	Deaf.hoh@ad-astrainc.com	www.scheduleinterpreter.com/ad-astra

Figure 115: Interpreter Services

DCA’s website is compliant with Section 508 of the Rehabilitation Act of 1973 and is accessible to individuals with disabilities. If an individual is unable to access the website using assistive technology (such as a screen reader or braille reader), they should contact CDBG-DR@dca.ga.gov to inform DCA of the problem. DCA will provide the information requested and work to correct the issue.

6.2 Modification to the Action Plan

Over time, recovery needs will change. Thus, DCA will amend the disaster recovery Action Plan as often as necessary to best address long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan. As applicable, amendments will outline any content that is being altered, a table reflecting any redistribution of funds, and a revised budget allocation table of all funds.

All changes are accentuated in the Action Plan using the following formatting:

Additions: **Highlighted in yellow**

Deletions: Text will be removed

Substantial Amendment

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

- A change in program benefit or eligibility criteria,
- The addition or deletion of an activity, or
- The allocation or reallocation of \$5 million or more

When DCA pursues the substantial amendment process, the amendment will be posted here at dca.georgia.gov/financing-tools/disaster-relief/community-development-block-grant-disaster-recovery-program-cdbg-dr for a 30-day public comment period.

The amendment will be posted in adherence with ADA and LEP requirements. DCA will review and respond to all public comments received and submit them to HUD for approval.

Non-substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections, clarifications, and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. DCA will notify HUD five (5) business days before the change is effective.

All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

7. Table of Figures

Figure 1: Photo: Hurricane Helene Damage (Source: John Falchetto / The Atlantic, 09/25/24)7

Figure 2: Georgia Disaster Declarations (10/02/23) (Source: FEMA)8

Figure 3: Hurricane Idalia Wind Swath (Source: NOAA)9

Figure 4: Total Rainfall (inches) from Hurricane Idalia (Source: NOAA)9

Figure 5: Georgia Disaster Declarations as of 9/24/24 (Source: FEMA) 11

Figure 6: Tropical Storm Debby's Total Rainfall in Inches (Source: NOAA) 11

Figure 7: Georgia Disaster Declarations (11/04/24) (Source: FEMA) 12

Figure 8: Hurricane Helene Maximum Wind Speeds and TreeS-DIP Damage (Source: NOAA, GTAC) 13

Figure 9: HUD-Identified MID Counties (Source: Federal Register) 14

Figure 10: State-Identified MID Counties 15

Figure 11: HUD-MID and State-MID Map..... 15

Figure 12: Unmet Needs, Mitigation Needs, Fair Housing and Civil Right Assessment Summary 16

Figure 13: Estimated Unmet Housing Need in LMI Areas..... 18

Figure 14: Impacted Housing Types and Estimated Loss (Source: FEMA IA) 19

Figure 15: Mobile Homes and Travel Trailers with FEMA Applications (Source: FEMA IA)² 19

Figure 16: Households by Cause of Damage (Source: FEMA IA) 20

Figure 17: Households with or without Homeowners Insurance (Source: FEMA IA)³ 20

Figure 18: Households with or without Flood Insurance (Source: FEMA IA) 21

Figure 19: Emergency Shelters (Source: Red Cross and DCA) 21

Figure 20: Transitional Housing and Homeless Individuals (2013: 2022) (Source: DCA) 22

Figure 21: IHP Application Progress (Source: FEMA IA) 23

Figure 22: Households Requesting Assistance by Disaster (by Monetary Sum) (Source: FEMA IA)⁶ 23

Figure 23: Gross Income by Household Type (Source: FEMA IA) 24

Figure 24: MID County Median Income (Source: Georgia Data)¹⁰ 26

Figure 25: MID LMI Counties 27

Figure 26: FEMA Housing Assistance Maximums 29

Figure 27: FEMA IHP Inspected HUD Categories – Homeowners (Source: Federal Register)..... 29

Figure 28: FEMA IHP Inspected HUD Categories- Renters (Source: Federal Register)..... 30

Figure 29: Owner-Occupied Damaged Properties by Damage Categories and Disaster 2023-2024 (Source: FEMA IA)..... 30

Figure 30: Owner-Occupied Average IHP Award Amount by Damage Categories 2023-2024 (Source: FEMA IA)..... 31

Figure 31: Owner-Occupied Loss Multiplier: Major-Low, Major-High, & Severe 2023-2024 (Source: Federal Register) 31

Figure 32: Renter-Occupied Damaged Properties by Damage Categories and Disaster (Source: FEMA IA) 32

Figure 33: Renter-Occupied Loss Multiplier – Major-Low, Major-High & Severe..... 32

Figure 34: Owner to Renter Household Ratio in IA Counties (Source: 2023: ACS 5-Year: DP04) 33

Figure 35: Owner to Renter Occupancy Ratio by Damage Category (Source: FEMA IA) 33

Figure 36: Mobile Home IA Applicants by Damage Category (Source: FEMA IA) 34

Figure 37: Minor-Low and Minor-High Estimated Total Loss for Homeowners (Source: FEMA IA)¹⁸ 34

Figure 38: Minor-Low and Minor-High Estimated Total Loss for Renters (Source: FEMA IA) 35

Figure 39: Minor-Low and Minor-High Estimated Total Loss: Combined (Source: FEMA IA)¹⁹ 35

Figure 40: Major-Low to Severe Estimated Total Loss for Homeowners (Source: FEMA IA & Federal Register)¹⁹ 35

Figure 41: Major-Low to Severe Estimated Total Loss for Renters: 2023 (Source: FEMA IA & Federal Register) 36

Figure 42: Major-Low to Severe Estimated Total Loss for Renters: 2024
(Source: FEMA IA & Federal Register)²¹ 36

Figure 43: Major-Low to Severe Estimated Total Loss: Combined (Source: FEMA IA)²¹..... 36

Figure 44: No FVL Estimated Loss: Homeowner and Renter (Source: FEMA IA) 37

Figure 45: Owner-Occupied Estimated Loss by Damage Category and Disaster 37

Figure 46: Renter-Occupied Estimated Loss by Damage Category and Disaster 38

Figure 47: Estimated Loss by Damage Category and Disaster: Combined..... 38

Figure 48: Average SBA Loan Amounts (Source: SBA) ²⁵ 39

Figure 49: Remaining Applications with SBA Home Loans by Number (Source: SBA)²⁵ 39

Figure 50: Applications Remaining with SBA Home Loans by Dollar Amount (Source: SBA)²⁵ 39

Figure 51: Flood Claims by Disaster and Flood Zone (Source: FIMA NFIP) 40

Figure 52: Flood Claims by Disaster and Flood Zone (Dollar Amount) (Source: FIMA NFIP)²⁶ 40

Figure 53: NFIP Claims and Flood Zones Map 41

Figure 54: Public Housing Damages (Source: GHARRP)..... 42

Figure 55: Top 5 Counties with PHA Damage (Source: GHARRP)²⁷ 42

Figure 56: IHP Assisted Households by Damage Category and Disaster (Number) (Source: FEMA IA) 43

Figure 57: IHP Assisted Households by Damage Category and Disaster (Dollar Amount) (Source: FEMA IA)²⁸. 43

Figure 58: SBA Disaster Home Loan Disbursement (Number and Dollar Amount) (Source: SBA) 44

Figure 59: NFIP Assistance by Flood Zone and Disaster (Source: FIMA NFIP)..... 44

Figure 60: Public Housing Damages and GHAARP Assistance (Source: GHARRP)..... 44

Figure 61: Total Housing Unmet Need..... 45

Figure 62: FEMA Permanent Work (Categories C-G) for 2023-2024 Hurricanes (Source: GEMA) 46

Figure 63: Top 5 Category C-G Unmet Need (Source: GEMA) 47

Figure 64: State-wide Power Outage Map for Hurricane Helene (9/28/24) (Source: poweroutage.us)..... 48

Figure 65: Hurricane Helene Landfall Map with Outages (Source: poweroutage.us) 49

Figure 66: Top 5 Counties with Cat F Unmet Needs (Source: GEMA) 49

Figure 67: Hurricane Helene Cat F Preliminary Damage Assessment (Source: GEMA) 50

Figure 68: Cat C Unmet Needs (Source: GEMA)..... 50

Figure 69: FEMA HMGP Disaster Summary (Source FEMA HMGP) 51

Figure 70: Total Infrastructure Unmet Needs (Source: GEMA & FEMA HMGP) 51

Figure 71: Average SBA Disaster Business Loan Amounts (Source: SBA) 52

Figure 72: Remaining Applications without SBA Loans (Source: SBA) 53

Figure 73: Applicants Remaining without SBA Loans by Dollar Amount (Source: SBA)⁴⁶ 53

Figure 74: Total Economic Revitalization Unmet Need..... 54

Figure 75: Unmet Needs Assessment..... 54

Figure 76: Natural Hazard / Community Asset Overlap Image (Source: GHMS) 56

Figure 77: Hazard Assessment Ranks and Priorities by Hazard Type (Source: GMHS)..... 57

Figure 78: Social Vulnerability Index Map by County (Source: GHMS) 59

Figure 79: Top Ten Composite Scores by County (Source: GHMS)..... 60

Figure 80: SVI and Wind Extent Mapping by County (Source: GHMS) 61

Figure 81: Number of Households by Cause of Damage and Disaster (Source: FEMA IA) 62

Figure 82: RL vs SRL Structures (Source: NFIP) 62

Figure 83: Severe Repetitive Loss Properties Map (July 2023) (Source: GMHS) 63

Figure 84: Repetitive Losses by County (Source: GHMS) 64

Figure 85: Average Hazard Score by County from Flooding (Source: GHMS) 65

Figure 86: Unpaved Public Roads (Source: GHMS) 66

Figure 87: Counties with State Facilities Exposed to >90 MPH Winds (Source: GHMS) 67

Figure 88: Employment in Hurricane Storm Surge Flood Zones (2023) (Source: Bureau of Labor Statistics)..... 69

Figure 89: Mitigation Set Aside 70

Figure 90: Persons with Limited English Proficiency Map..... 72

Figure 91: 5% or More of Population, Speak English Less than “Very Well” (Source: Census)..... 73

Figure 92: Race by Statewide, Disaster Declaration, and MID Areas 74

Figure 93: Key Age Demographics by Statewide, Disaster Declaration, and MID Areas ⁶²..... 75

Figure 94: Elderly Population Map..... 76

Figure 95: Disability by Statewide, Disaster Declaration, and MID Areas..... 77

Figure 96: Individuals with a Disability Map..... 78

Figure 97: Sex by Statewide, Disaster Declaration, and MID Areas 79

Figure 98: Households with Children..... 79

Figure 99: National Origin Demographics..... 80

Figure 100: Housing Tenure by Statewide, Disaster Declaration, and MID Areas 80

Figure 101: Vulnerable Populations..... 81

Figure 102: Homelessness, 2022 Point in Time Count 82

Figure 103: MID Areas that include Federal Opportunity Zones 83

Figure 104: Georgia State Recognized Tribes 84

Figure 105: R/ECAPs 84

Figure 106: Racially or Ethnically Concentrated Areas of Poverty Map..... 85

Figure 107: Funding Allocation 87

Figure 108: Grantee Administration Activities Overview 90

Figure 109: Grantee Planning Activities Overview 91

Figure 110: Grantee Housing Programs Overview 91

Figure 111: Grantee Infrastructure Programs Overview 96

Figure 112: Grantee HMGP Match Programs Overview 98

Figure 113: Schedule of Public Meetings 101

Figure 114: Public Hearings Schedule 103

Figure 115: Interpreter Services 106

8. Action Plan Appendix

8.1 MID Expansion Request



**GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS**

March 7, 2025

Office of Disaster Recovery
U. S. Department of Housing and Urban Development
451 7th Street, SW
Washington, D.C. 20410

To Whom It May Concern:

The Georgia Department of Community Affairs (DCA) is formally requesting the designation of additional zip codes and counties for HUD-identified Most Impacted and Distressed (MID) areas for the State of Georgia's 2023/2024 Community Development Block Grant – Disaster Recovery (CDBG-DR) allocation. Currently there are 20 HUD-identified MID areas, however while reviewing data for the Action Plan and conducting outreach in the communities affected by Hurricane Idalia, Tropical Storm Debby, and Hurricane Helene, it became apparent there are considerable unmet needs in many other zip codes and counties. Using the unmet need threshold of \$2,000,000 for a zip code and \$10,000,000 for a county designation, DCA has identified 40 zip codes encompassing 24 counties that have met or exceeded those threshold amounts. A complete list is provided in the page following this letter.

DCA is currently drafting the Action Plan for the 2023/2024 CDBG-DR allocation and will then publish for a 30-day public comment period. This letter will be included in the Action Plan as an appendix. If this request is approved prior to submission of the Action Plan to HUD, the additional areas will be identified as HUD-identified MID areas. If the request is not approved prior to submission of the Action Plan to HUD, the additional areas will be designated as State-identified MID areas.

DCA has included data needed to support this request and substantiate the needs on the pages following this letter. If additional information is needed please contact me at 470-925-1342 or Kathleen.Tremblay@dca.ga.gov. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Tremblay'.

Kathleen Tremblay
Program Director, CDBG-Disaster Recovery

cc: Tarcarnesia Blackshear, Senior Community Planning and Development Representative, HUD

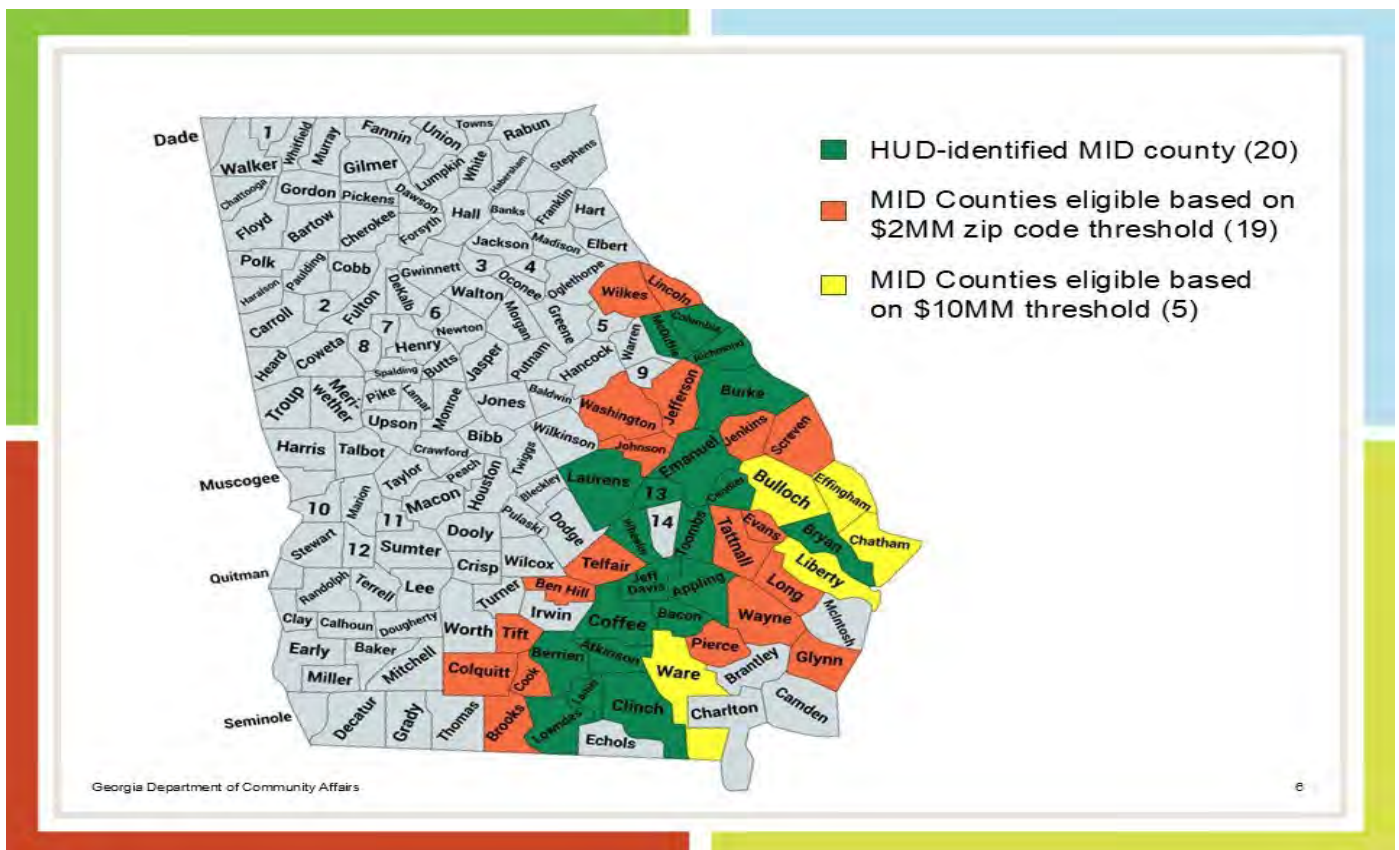
Enclosures



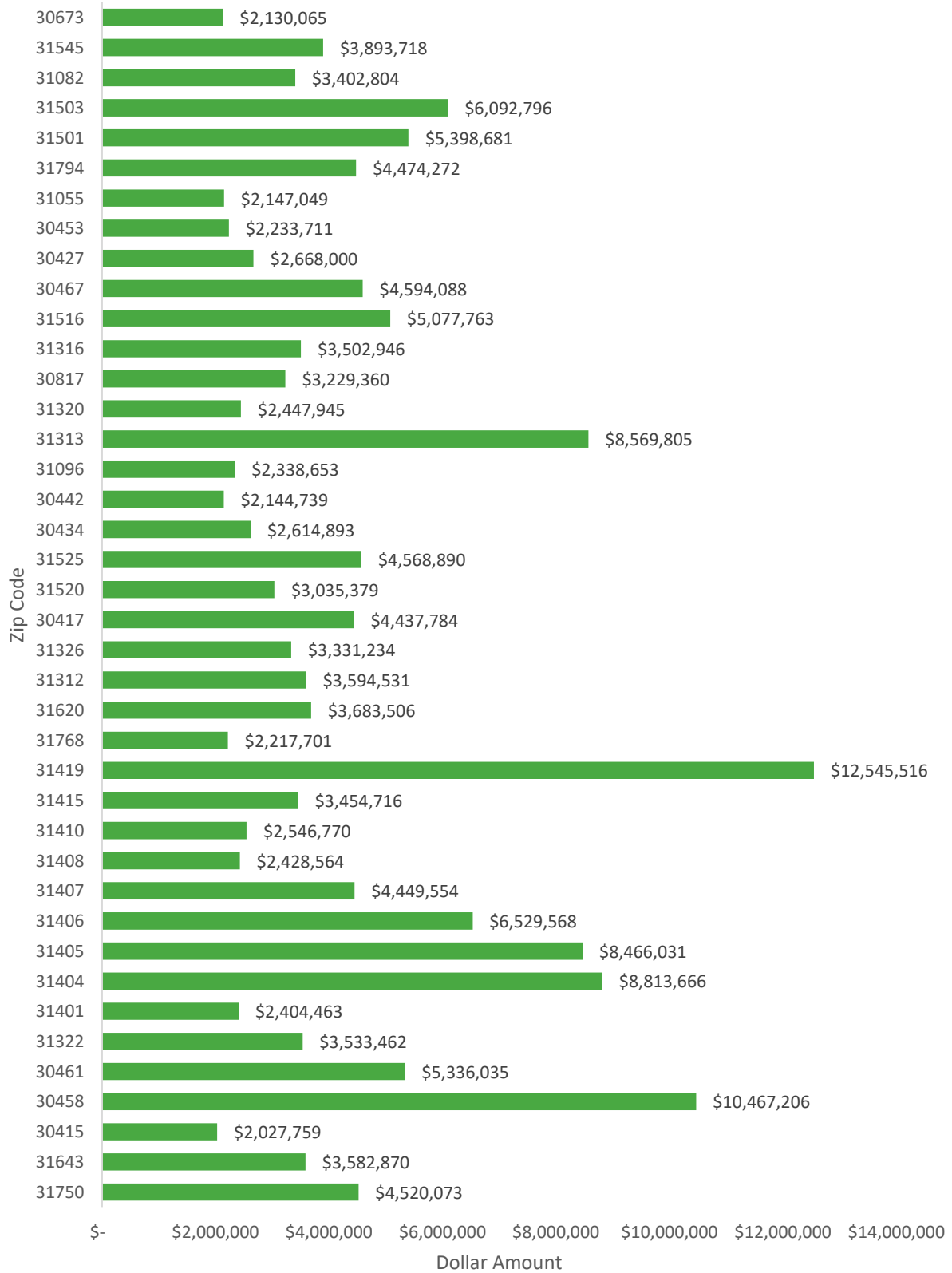
MID Expansion Data – 2023/2024 CDBG-DR Allocation

DCA collected data from the Georgia Emergency Management and Homeland Security Agency (GEMA/HS), the Federal Emergency Management Agency (FEMA), and the Small Business Administration (SBA) to understand where the greatest need from Hurricane Idalia, Tropical Storm Debby, and Hurricane Helene still existed. The Presidential Disaster Declarations for these disasters ultimately resulted in five (5) counties being eligible for FEMA Individual Assistance (IA) and Public Assistance (PA) for Hurricane Idalia, seven (7) counties being eligible both IA and PA for Tropical Storm Debby, and sixty-one (61) counties being eligible for both IA and PA for Hurricane Helene. Consequently, HUD designated zip codes and counties within these areas as HUD-identified Most Impacted and Distressed (MID) areas and allocated \$265,726,000 for the State of Georgia to provide long-term recovery solutions. The State of Georgia is required to expend a minimum of 80% of the allocation in HUD-identified MID areas. Although the needs of the HUD-identified MID areas are substantial, DCA has identified additional areas with substantial unmet needs that need access to the CDBG-DR resources.

DCA used the data included in the following pages to determine that multiple areas exist with thresholds meeting or exceeding the \$2MM for a zip code and \$10MM for a county. Following guidance from HUD, DCA would like to include the entire county as a MID where one or more zip codes meets the MID threshold.



Estimated Unmet Needs



Zip Codes Greater than \$2M		
24 Counties		
40 Zip Codes		
County/Zip>\$2M	Estimated Unmet Need	# of Zip Codes
Ben Hill (County)	\$ 4,724,732	1
31750	\$ 4,520,073	1
Brooks (County)	\$ 5,705,835	1
31643	\$ 3,582,870	1
Bulloch (County)	\$ 21,080,002	3
30415	\$ 2,027,759	1
30458	\$ 10,467,206	1
30461	\$ 5,336,035	1
Chatham (County)	\$ 57,176,265	10
31322	\$ 3,533,462	1
31401	\$ 2,404,463	1
31404	\$ 8,813,666	1
31405	\$ 8,466,031	1
31406	\$ 6,529,568	1
31407	\$ 4,449,554	1
31408	\$ 2,428,564	1
31410	\$ 2,546,770	1
31415	\$ 3,454,716	1
31419	\$ 12,545,516	1
Colquitt (County)	\$ 4,440,974	1
31768	\$ 2,217,701	1
Cook (County)	\$ 5,957,715	1
31620	\$ 3,683,506	1
Effingham (County)	\$ 10,265,339	2
31312	\$ 3,594,531	1
31326	\$ 3,331,234	1
Evans (County)	\$ 4,638,610	1
30417	\$ 4,437,784	1
Glynn (County)	\$ 9,861,393	2
31520	\$ 3,035,379	1
31525	\$ 4,568,890	1
Jefferson (County)	\$ 8,346,737	1
30434	\$ 2,614,893	1
Jenkins (County)	\$ 2,272,340	1
30442	\$ 2,144,739	1
Johnson (County)	\$ 3,267,224	1
31096	\$ 2,338,653	1
Liberty (County)	\$ 12,920,752	2
31313	\$ 8,569,805	1
31320	\$ 2,447,945	1
Lincoln (County)	\$ 3,363,760	1
30817	\$ 3,229,360	1
Long (County)	\$ 4,154,106	1
31316	\$ 3,502,946	1
Pierce (County)	\$ 6,594,285	1
31516	\$ 5,077,763	1
Screven (County)	\$ 5,566,785	1
30467	\$ 4,594,088	1
Tattnall (County)	\$ 6,832,495	2
30427	\$ 2,668,000	1
30453	\$ 2,233,711	1
Telfair (County)	\$ 5,175,805	1
31055	\$ 2,147,049	1
Tift (County)	\$ 5,697,721	1
31794	\$ 4,474,272	1
Ware (County)	\$ 12,396,030	2
31501	\$ 5,398,681	1
31503	\$ 6,092,796	1
Washington (County)	\$ 6,638,664	1
31082	\$ 3,402,804	1
Wayne (County)	\$ 6,992,524	1
31545	\$ 3,893,718	1
Wilkes (County)	\$ 2,633,766	1
30673	\$ 2,130,065	1

Counties Greater than \$10M	
5 Counties	
County	Estimated Unmet Need
Chatham (County)	\$ 57,176,265
Bulloch (County)	\$ 21,080,002
Liberty (County)	\$ 12,920,752
Ware (County)	\$ 12,396,030
Effingham (County)	\$ 10,265,339

Justification for DCA’s Most Impacted and Distressed (MID) Counties Determination

With limited data regarding SBA damage assessments, we are currently using FEMA IHP award averages, Federal Register multipliers, and IHP Maximum awards to calculate the loss multiplier used to calculate the unmet housing need for the 2023-24 disasters in Georgia.

FEMA Damage Category Loss Multiplier Calculation - Minor-Low & Minor-High

For FEMA IA Applications with Minor-Low and Minor-High damage categories, the count of those applications was divided by the overall IHP awarded amount per damage category and rounded up to the nearest whole dollar value.

Owner-Occupied Average IHP Award Amount by Damage Categories

Damage Category	# of Owners	Total IHP Awarded Amount	Average IHP Award Amount
Minor-Low	16,689	\$ 30,075,144.37	\$ 1,803
Minor-High	14,047	\$ 78,035,610.52	\$ 5,556

Owner-Occupied Housing - FEMA Damage Category Loss Multiplier Calculation - Major-Low, Major-High, & Severe

For FEMA IA applications for owner-occupied housing with Major-Low, Major-High, and Severe damage categories, the loss multiplier was provided in the January 13, 2025, Federal Register Notice [90 FR 1754]. Since the types of damages varied for the 2023-24 disasters between floods, severe storms, hurricanes, and tornados, the average of those 4 categories was used as the Estimated Loss Multiplier. The notice identified different values for the mobile home residency type compared to all other residency types.

Owner-Occupied Loss Multiplier – Major-Low, Major-High & Severe

Damage Category	Non-Mobile Home Loss Multiplier	Mobile Home Loss Multiplier
Major-Low	\$39,952	\$77,058
Major-High	\$55,922	\$98,463
Severe	\$70,567	\$134,834

Renter - FEMA Damage Category Loss Multiplier calculation - Major-Low, Major-High & Severe

For FEMA IA applications for renter-occupied housing with damage categories of Major-Low, Major-High, and Severe, the loss multiplier is the lessor of the maximum HA award amount or the average of the loss multipliers provided in 90 FR 1754. The maximum HA award amount was different in 2023 and 2024. The Federal Register guidance identified different values for the mobile home residency type compared to all other residency types.

Renter-Occupied Loss Multiplier – Major-Low, Major-High & Severe

Damage Category	Idalia		Debby & Helene	
	Non - Mobile Home	Mobile Home	Non - Mobile Home	Mobile Home
Major-Low	\$39,952	\$41,000	\$39,952	\$42,500
Major-High	\$41,000	\$41,000	\$42,500	\$42,500

Severe	\$41,000	\$41,000	\$42,500	\$42,500
--------	----------	----------	----------	----------

FEMA Damage Category Loss Multiplier – No FEMA Verified Loss

FEMA IA applicants who applied for assistance and have no real property or personal property damages allocated but have not received an inspection are categorized as “NO FVL With No Inspection.” Without an inspection of the property confirming there was no Real Property or Personal Property damage, we use the Minor-Low multiplier to estimate the total loss. FEMA IA applicants who applied for assistance and have no real property or personal property damages allocated and had an inspection are categorized as “NO FVL With Inspection.” Since FEMA physically inspected these properties and found no damage, the multiplier for these applicants is 0.

Damage Category	Estimated Loss Multiplier
NO FVL With No Inspection	\$1,803
NO FVL With Inspection	\$0

8.2 Summary of and Response to Public Comments