

# CDBG-MIT Planning Manual



~~Deadline to Request Planning Funds:  
January 29, 2021~~

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## Manual Edits

DCA reserves the right to edit this manual when necessary. DCA will mark all changes and will label the version of the Manual. All versions of the manual will be posted on the DCA website. DCA will use the following formatting to mark all changes:

Additions: Font color red, underline

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

## Introduction

The Department of Community Affairs (DCA) created this Planning Manual to communicate the process for requesting planning funds and to detail program requirements. This Manual represents one of the elements by which the Department addresses its administrative responsibilities for the Community Development Block Grant Disaster Recovery (CDBG-DR) and Mitigation (CDBG-MIT) funding. Every effort has been made to balance the need for sufficient information upon which to make rational decisions and to ensure compliance with Federal law with the desire to eliminate all unnecessary paperwork and reduce the administrative burden on local governments.

Applicants are responsible for understanding the contents of the entire manual.

## Overview of CDBG-MIT Funding

On February 9, 2018, the Department of Housing and Urban Development (HUD) appropriated \$26,961,000 in CDBG-MIT Funds to the State of Georgia in response to two tornadoes occurring in January 2017 (FEMA Disaster Number DR-4294 and DR-4297) and Hurricane Irma (DR-4338). Of these funds, \$4,044,150 has been reserved for use by DCA and to be used for mitigation planning activities within the fifteen counties declared eligible for FEMA's Individual and Public Assistance (IA and PA). Planning funds are intended to be used on sound, sustainable long-term recovery planning informed by a pre-and post-disaster evaluation of hazard risks.

Federal Register Notice 84 FR 45838 primarily governs the use of these funds along with preceding Federal Register Notices, Public Law 115-123, and the State of Georgia's Mitigation Action Plan. The official Method of Distribution is outlined in the State of Georgia's Mitigation Action Plan.

## Technical Assistance

Interested parties are encouraged to contact DCA if questions exist regarding the eligibility of planning activities or the need for technical assistance in developing a viable planning activity. Contact information is provided on the following page:

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## What is Disaster Planning?

Disaster planning is the process by which agencies or local governments collaborate with community residents, businesses, and/or neighboring communities to identify actions and projects necessary for holistic recovery and to build resilience for all populations. DCA encourages organizations interested in planning funds to be creative, forward-thinking, and bring requests that embody mitigation objectives. In the end, the goal is to create a well-reasoned public document which lays out community findings and visions for future success, as well as specific identified issues, solutions, high impact projects for implementation, and funding strategies. DCA hopes to empower local communities and partner agencies to build a foundation for continuous coordination and data driven outcomes.

## Eligibility Requirements

Each planning activity must be CDBG eligible (or allowed via a waiver). Additionally, the following counties and the jurisdictions within are eligible to apply for assistance: Berrien, Camden, Charlton, Chatham, Coffee, Cook, Crisp, Dougherty, Glynn, Liberty, McIntosh, Thomas, Turner, Wilcox, and Worth.

## Common Mitigation Planning Activities

The following items are common Mitigation planning activities intended to foster creative planning ideas. This list is not all-inclusive.

- The development and implementation of modern and resilient building codes consistent with an identified model or standard, such as ASCE 24 (<https://ascelibrary.org/doi/book/10.1061/asce24>) and ASCE 7 (<https://www.asce.org/asce-7/>) as may be applicable, to mitigate against current and future hazards.
- The development and implementation of land use plans to address natural hazards identified in the grantee's Mitigation Needs Assessment.
- Upgrading mapping, data, and other capabilities to better understand evolving disaster risks.
- Enhancing and updating real property registration and land information systems.
- Planning and public service activities necessary to reduce flood insurance premiums in the NFIP voluntary Community Rating System's (CRS) incentive program.
- Grantees may also partner with agency staff responsible for community floodplain management activities to participate in the National Flood Insurance Program's (NFIP) Community Rating System (CRS), which is a voluntary incentive program that recognizes floodplain management activities that exceed minimum NFIP requirements. Exceeding these requirements can result in discounted flood insurance premium rates which reflect a community's reduced flood risk.
- Resilience Planning – identifying places where new housing would be safer from storms and floods, but where people will still be connected to transportation, schools, grocery stores and houses of worship.

For more information related to eligibility of planning activities, please refer to 24 CFR 570.205. While the list at 24 CFR 570.205 is comprehensive, CDBG-MIT planning activities must have a mitigation focus.

## Ineligible Activities

The following activities are not considered eligible for funding or reimbursement:

- Engineering, architectural, and design costs related to a specific project such as detailed engineering specifications and working drawings.
- Construction or any costs of implementation of projects or plans.
- Costs not associated with the development of plans or other planning activities
- Any activity not authorized under the State of Georgia's Action Plan, CDBG, CDBG-DR, or CDBG-MIT statute and/or regulations, as noted in the applicable Federal Register Notices, is ineligible to be assisted with CDBG-MIT Funds.

## Activity Limits

Given the disaster planning needs vary greatly by community, DCA does not have a limit on the amount of funds a community can request. However, DCA will complete an assessment to determine if the costs are reasonable.

## Period of Performance

~~All planning-specific activities must be concluded within twelve (12) months of start dates. All program activities, including closeout, must be concluded within eighteen (18) months of start dates. The applicant is advised to consult with DCA prior to application submission if difficulties meeting this requirement are anticipated. The performance period of all planning-specific activities is dependent upon the terms of each individual Subrecipient Agreement. The applicant is advised to consult with DCA if difficulties with meeting the requirements are anticipated.~~

## Promoting an Inclusive and Participatory Planning Process

Where possible, applicants are encouraged to involve residents within the communities to participate in the planning process. The goal of the CDBG-MIT Planning Program is to develop resiliency plans that not only protect life and property from future hazards, but more fundamentally promote an inclusive and participatory recovery process, that enables all residents to realize the benefits of revitalized communities.

## Duplication of Benefits (DOB)

Federal law prohibits any person, business concern, or other entity from receiving Federal financial assistance for any part of a loss to which he or she has already received financial assistance through any other program, insurance, or funding source. Additionally, CDBG-MIT funds are considered funds of last resort. If a project is partially or fully funded, CDBG-MIT funds are prohibited from replacing the funds that have already been dedicated to the project.

Many federal and state agencies are involved in responding to Presidentially declared disasters under the Stafford Act. Applicants should be aware that the Supplemental Appropriations Act authorizing CDBG-DR and/or CDBG-MIT funding may include restrictions on using those program funds to provide assistance when insurance providers or other federal or state agencies have already funded all or a portion of a

disaster relief activity. Certain Supplemental Appropriations Acts also include restrictions against use of those program funds as a matching requirement, share or contribution for any other federal program.

The Stafford Act contains eligibility requirements for applicants who have received prior disaster funding based upon whether they are in compliance with requirements associated with receipt of those funds. Where applicable, applicants must be in compliance with these restrictions or individual funding will be denied. If you have any questions on use, compliance, determining and/or calculating duplication of benefits, please contact DCA.

## National Objectives

Funds being used for planning activities for the development of community plans are part of the 20% planning and administrative cap of CDBG-DR funds as according to 24 C.F.R. §570.483(f). Funds with this designation are not required to meet a national objective.

## Environmental Review Requirement

There are many federal and state environmental protection laws and regulations to consider when planning and implementing CDBG-MIT funded projects. It is important to note that compliance is often required for all funding sources, public and private, and for all components of the entire project. Applicants must comply with the National Environmental Policies Act of 1969 (NEPA) and HUD regulations implementing NEPA titled “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities” (24 CFR Part 58).

All CDBG-MIT projects must take certain actions to comply with this regulation before committing funds. This generally includes the completion of an “Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5” form to document actions taken to comply with environmental laws.

A copy of the form can be found via the following web link:

<https://www.hud.gov/sites/dfiles/CPD/documents/Part-58-Exempt-CENST.pdf>

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## How to Apply

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1. Interested parties must submit a narrative detailing the following:
  - Summary of the proposed planning activity and the plan that will be created if the project is selected for funding.
  - Details of how the proposed planning activity will protect life and property from future hazards
  - An explanation of the implementation schedule. CDBG-Mitigation Planning Activities must result in a planning document that can be implemented. If awarded, DCA will monitor to determine if the implementation schedule is met.
  - Projected Budget
  - Project Timeline - At a minimum, the expected dates for the following milestones must be included: Procurement, Begin Plan Development, Plan completed, initiate closeout.
  - Duplication of Benefits - Applicants must indicate whether funds were received for similar purposes. See the DOB section of this guide for more information; and

- Environmental Review Documentation

2. Review Process: DCA reviews each Application for eligibility, completeness, and will score based on the scoring rubric on the following page.
3. Award Process: Applicants with successful applications that are awarded funding receive an award letter which documents the next steps required to accept and execute a Subrecipient Agreement (i.e. contract) with DCA. Applicants that are not awarded funding will be contacted and notified with a written decision.
4. Procurement of vendor to complete planning activities. Procurement guidelines will be provided with the Subrecipient Agreement.