GEORGIA DEPARTMENT *of* COMMUNITY AFFAIRS

State of Georgia
CDBG-DR Public Action Plan
January 2023 Tornadoes

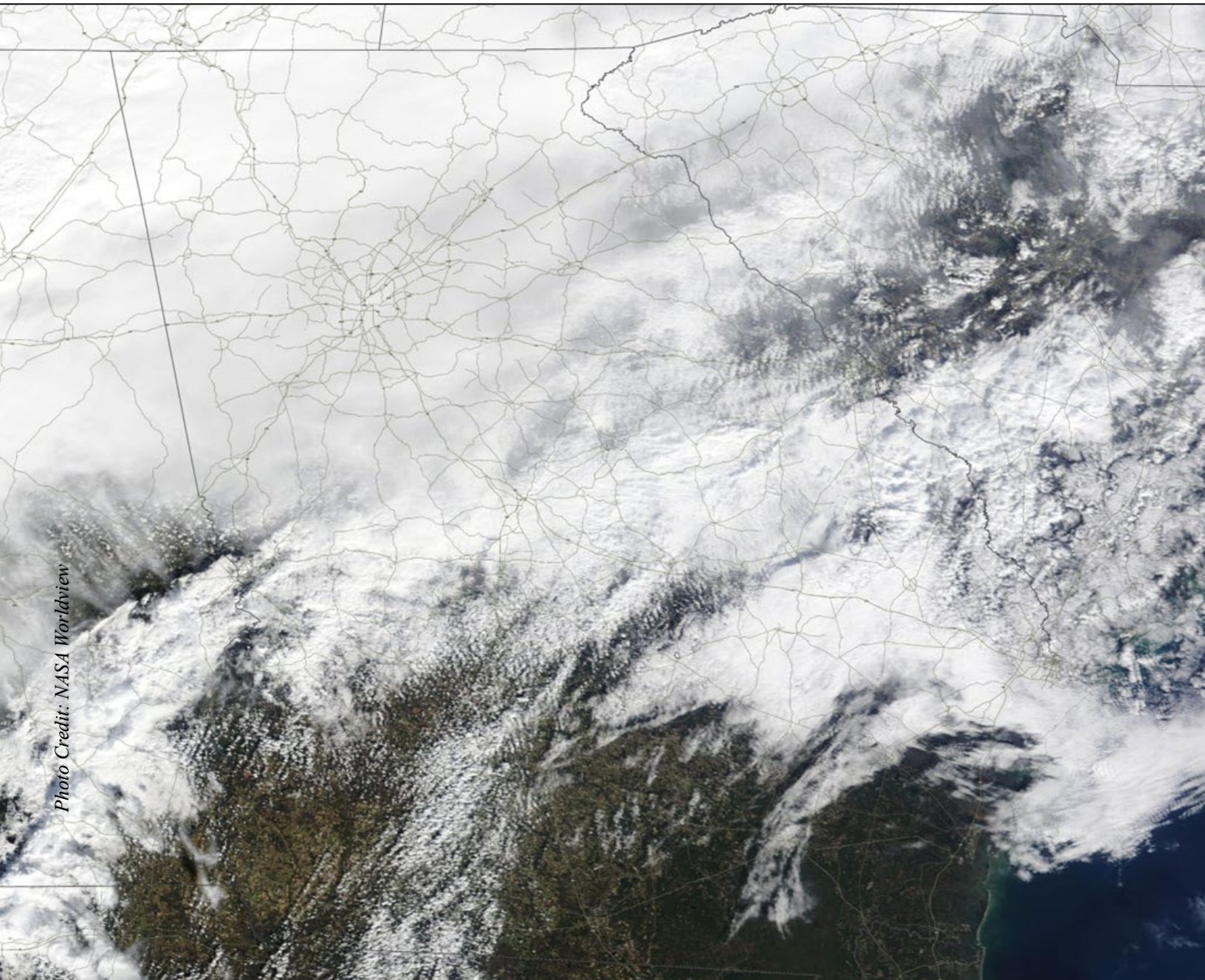

Photo Credit: NASA Worldview

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
May 29, 2024

Date Amendment Approved by HUD	Amendment Number	Description of Amendment
TBD	1	Applying the requirements of the Universal Notice to the January 2023 allocation and noting the addition of plus-up funds awarded to the State of Georgia.

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1. Executive Summary

Overview.

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Georgia will receive $12,595,000 in funding to support long-term recovery efforts following the January 2023 tornadoes through the Georgia Department of Community Affairs (DCA). Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet need in Butts, Henry, Jasper, Meriwether, Newton, Spalding, and Troup Counties.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for quicker recovery. HUD has allocated $12,595,000 in CDBG-DR funds to the State of Georgia in response to the January 2023 tornadoes, DR-4685, through the publication of the Federal Register, *Vol. 88, No. 226, Monday, November 27, 2023*. This allocation was made available through Public Law 117-328.

Subsequently, an additional $9,346,000 was allocated to the State of Georgia through the publication of the Federal Register, *Vol. 90, No. 95, Monday, May 19, 2025*, pursuant to Public Law 118-158. In total, the $21,941,000 in CDBG-DR funds will support recovery from the January 2023 tornadoes.

Disaster Specific Overview.

On January 12, 2023, Georgia was subjected to strong winds and thunderstorms, which resulted in an onslaught of as many as 14 tornadoes and led to widespread power outages across Metro Atlanta and Central Georgia.

According to the National Weather Service, at its height, the storm originated as a supercell thunderstorm before spawning into a mesocyclone. This unique meteorological interaction involved at least three to four tornadoes circulating concurrently around a larger circulation in southwest Spalding County. On a scale of EF0 – EF5, the highest rated tornado out of the 14 that impacted Georgia that day was an EF3, indicating “severe damage”. Winds reached as high as 155 mph, causing wind damage with an estimated extent of 2,200 yards in some areas and traveling just under 32 miles across noted regions like Spalding and Henry County. Not only were there multiple tornadoes on the ground simultaneously, but Spalding County also experienced tornadoes that briefly crossed paths. One circulation would hit just minutes after the other, and, in some instances, two tornadoes would merge. This likely magnified the damage seen in these areas, increasing the power and intensity of the cyclones. These circumstances made it difficult to track and therefore distinguish between each of the tornadoes, but the impact of their damage was evident.

Over the course of four hours, tornadoes littered Georgia starting around 3 p.m. and carried into evening hours, the last of which dissipated just after 7 p.m. Within that time, communities sustained substantial

property and infrastructure damage that residents are still facing in the aftermath of the disaster. Overall, the storm resulted in as many as 32 injuries and, unfortunately, claimed the lives of two individuals.

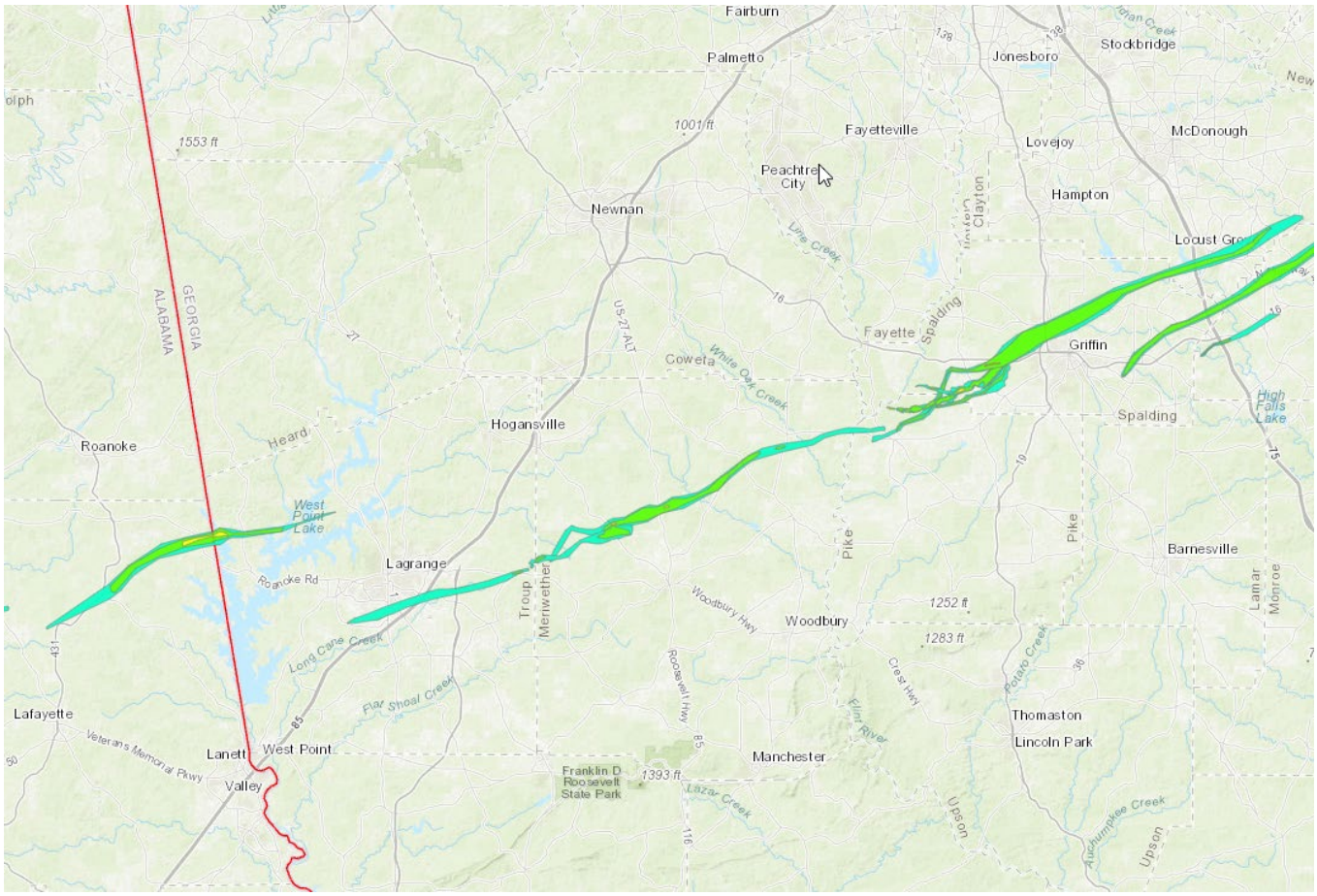


Figure 1: Tornado Track, Courtesy of NOAA

Many of the impacted counties experienced similar issues to varying proportions. Within Spalding County, the City of Griffin noted that it was already facing a concerning housing shortage prior to the storm, a position shared by other counties as well. This was further exacerbated by the events of January 12. Griffin noted that due to their nuisance abatement program, there was a deficit of just over 300 dwelling units. Compounded by the additional 1,007 units impacted by the storm as reported in their Safety Assessment, the city continues to be in vital need of assistance to combat these surmounting challenges. Jasper County also noted that communications within impacted counties were diminished due to the storm, including several downed trees and power lines, which exposed deficiencies in radio and cell coverage.

In the wake of the storm, volunteer groups such as the National Voluntary Organizations Active in Disaster (VOAD) and other community organizations set about assessing the damage and providing assistance to the community. They coordinated efforts to remove debris from roads and homes, suspend tarps, and provide supplies for those whose funds and circumstances were hampered by the costly

expenses of the disaster. More than a year later, volunteer groups continue to actively assist impacted communities even as their available funds dwindle.

Despite community efforts to address these short— and long-term impacts, additional support is integral to restoring and augmenting resilience against future disasters by developing communities into healthier, well-adapted strongholds.

Photo - Damaged Business in Griffin, GA, courtesy of 11 Alive News

Photo - Damaged home in Griffin, courtesy of 11 Alive News

Photo - Damaged home in Troup County, courtesy of 11 Alive News

Summary.

The purpose of this allocation is to address unmet needs resulting from DR-4685 and to mitigate further damage in the event of future disasters. When assistance from other sources, such as 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 funding gaps where needed. DCA seeks to help provide the resources 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, economic revitalization, and mitigation measures through CDBG-eligible disaster recovery activities.

The remaining unmet need will be calculated by first estimating the portion likely to be addressed by insurance proceeds, other federal assistance, or alternative funding sources. These estimates are based on the best available data at this time and may be revised in the future as additional information becomes available. After accounting for aid already made available through state and other funds, such as federal assistance, in addition to a 15 percent allocation for resiliency measures, the remaining estimated unmet need is approximately $284,142,182. Given the addition of funds allocated to Georgia, the increase of $9,346,000 brings the total of the federal allocation to $21,941,000 which will now allow the state to address about 7.7 percent of the total estimated unmet need.

When examining the relative need by sector, housing represents the greatest unmet need of $248,746,367 (87.5%), followed by the economic sector with $29,391,294 (10.3%), and the infrastructure sector with $6,004,521 (2.11%). Each of these three sectors will be addressed in detail in the sections to follow. This data was also substantiated, given the feedback received during an outreach meeting prior to the publication of the Action Plan and through subsequent information collected by DCA from impacted counties. This includes county-specific information regarding Damage Assessment Field Sheets, internal safety assessments, and other relevant materials.

After considering the primary unmet needs identified, citizen input, and the availability of funds awarded, DCA is proposing a Homeowner Rehabilitation and Reconstruction Program (HRRP) for single-family homes and an Affordable Rental Rehabilitation Program (ARRP) for landlords. The objective of the HRRP program, as it pertains to this allocation, is to strengthen homes to better withstand weather conditions, primarily attributed to wind and rain, through home hardening initiatives. This includes fortifying roof structures, installing water membranes to prevent leaks caused by displaced shingles, and securing structures to their foundation. The ARRP will seek to provide safe and affordable rental units that are in short supply. DCA will directly implement both programs through the securement of a procured vendor.

The table below outlines DCA's proposed allocation of funds and remaining unmet need. The Federal Register Notice's and the updated Universal Notice, as amended, has established caps for funds designated under administration, planning, and public service activities. Additionally, 15 percent of funds will be set aside for mitigation activities.

Unmet Need and Proposed Allocation

Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration	$0.00	0.00%	$629,750.00	5.00%
Planning	$0.00	0.00%	$1,000,000.00	7.94%
Housing	$248,746,367.00	87.54%	$16,699,250.00	76.11%
Infrastructure	$6,004,521.00	2.11%	$0.00	0.00%
Economic Revitalization	$29,391,294.00	10.34%	$0.00	0.00%
Public Services	$0.00	0.00%	$750,000.00	5.95%
Mitigation	$0.00	0.00%	$2,862,000.00	13.04%
Total	**$284,142,182.00**	**100.00%**	**$21,941,000.00**	**100.00%**

Data Source(s): Unmet needs assessment

*Allocation Amount includes project delivery costs and does not include administration and planning costs.

2. Unmet Needs Assessment

Overview.

The Unmet Needs Assessment aims to assess the three core aspects of recovery: housing, infrastructure, and economic revitalization. The data provided in this section will inform the Distribution of Funds in Section 4 to follow.

As outlined in the Federal Register Notice's, and the updated Universal Notice, as amended, 80 percent of all CDBG-DR funds will benefit the HUD-identified MID area under zip code 30223, which DCA will expand to the entirety of Spalding County. The remaining 20 percent of the allocation will be spent within areas that received a presidential major disaster declaration for DR-4685 and were eligible for both individual and public FEMA assistance. These state or grantee-identified MID counties include Butts, Henry, Jasper, Meriwether, Newton, and Troup County.

Communities battled rotational wind damage attributed to varying degrees of intense tornadoes as well as straight-line wind damage attributed to strong thunderstorms. The winds uprooted and snapped numerous trees, some of which blocked roads and collapsed on the properties of residents and business owners. The winds also brought about structural damage to roofs, siding, gutters, and power poles, with debris being flown about for hundreds of yards. FEMA stated in a press release that the costs for debris removal and emergency response had exceeded 15 million dollars in the hardest hit areas just a month after the disaster.

Troup found themselves under dismally similar circumstances when they encountered another two tornadoes, an EF-1 in February and an EF-3 in March. The Official Troup County, Georgia -

Government Facebook page shared that 139 homes were damaged during the March 26 tornado. The tornado also made its way into Meriwether County before eventually weakening. Only exacerbating circumstances further were the seven inches of rain from those weekend storms that threatened the failure of the Spalding County Heads Creek Reservoir Dam. This led to calls for the evacuation of residents who were downstream from the dam as roads and nearby streams and rivers flooded.

For residents and officials who were already preoccupied with impacts from the January 2023 disaster, the storms that came after only added to the strain on the resources and efforts communities were putting forth.

a. Housing Unmet Need

Disaster Damage and Impacts.

This section on housing recovery details the overall impact of the January tornadoes on the seven counties declared eligible for FEMA's Individual Assistance (IA) and Public Assistance (PA) and the unmet needs that still exist within the communities.

Conditions Pre-Disaster:

DCA's most recent 2023 Housing Needs Assessment provided valuable insights into housing conditions prior to the disaster, as significant challenges could be noted on both the homeowner and rental fronts.

Seeing as Georgia's poverty rate is higher than that of the US at 14.3 percent versus 11.4 percent in 2020, it's understandable how this statistic contributes to the narrative of home affordability for individuals on the lower end of the income spectrum. In 2019, Georgia identified 29.03 percent of households as cost-burdened, having spent more than 30 percent of their monthly income on housing costs. Of this group, a majority of households were renters, with 43.4 percent considered cost-burdened compared to only 19.3 percent of homeowners. Households considered cost-burdened are indicated as paying more than they can reasonably afford for their housing. As such, those with the lowest income tended to have the highest rate of cost burden. Homeowners in the lowest income tier (0-30% AMI) had the highest rate of cost burden at 69.1 percent. Similarly, renters in the second-lowest income tier (31-50% AMI) had the highest rate of cost burden at 79.1 percent.

What Georgia residents are seeing is a lack of affordable housing that's accessible, contributing to an affordability housing gap. Those in the highest income tier have a limited supply of housing within their pricing bracket, with a housing gap of over 900,000 units among homeowners and 395,000 units among renters. This leads households earning 100%+ AMI to occupy housing that would otherwise be affordable to those at a lower income. Households in this higher income bracket ultimately make up the largest group occupying units at all income levels. The outcome is a housing gap across all income tiers between 0-100% AMI, and explains the large affordability gap at the lower income tiers.

While single-family dwellings still make up the largest housing type, there has been an increasing expansion of multi-family units. Decline in the homeowner vacancy rate from 2010 to 2020 may have led those looking towards buying to instead remain and put further strain on the rental market. Likewise, the rental vacancy rate has also decreased, falling by 33 percent within the same time span and decreasing the overall vacancy rate from 13.7 to 11.5 percent. Rental prices as well are climbing due to high demand, with the median gross rent having risen 7.6 percent from $968 in 2015 to $1,042 in 2020.

Housing – FEMA Individual Assistance Data:

DCA analyzed several sets of data to gauge the housing impact caused by the January tornadoes. These sets include data from FEMA and limited SBA home loan data. The total number of FEMA applicants within the presidentially declared area is 8,490. Of those, 538 had FEMA Verified Losses (FVL). Data in the table below shows the FVL determinations in the disaster-impacted counties. Spalding County experienced $3,212,497 in FVL, the highest in the 7-county declared area. Henry County and Butts County ranked second and third with losses totaling $902,137 and $522,495, respectively. The total FVL for the disaster is $5,351,839. On average, applicants from Spalding County and Butts County had the highest FVL amounts. The average FVL amounts were derived by dividing the number of applicants with the FVL and the FVL dollars for each county.

Figure 2: FEMA FVL Summary

County	# of Applicants	Applicants with FVL	FVL Dollars	Average FVL Dollars
Butts County	542	52	$522,495	$10,048
Henry County	1,677	14	$902,137	$7,913
Jasper County	231	30	$160,191	$5,340
Meriwether County	319	48	$77,039	$5,772
Newton County	760	34	$186,706	$5,491
Spalding County	4,337	4	$3,212,497	$13,220
Troup County	624	17	$90,775	$5,340
Total	**8,490**	**538**	**$5,351,839**	

The FEMA Individual Assistance program (IA) consists of a multitude of services for individuals in disaster-declared counties. The Individual and Household Program (IHP) data is broken down into two categories, Housing Assistance (HA) and Other Needs Assistance (ON). Housing funds made available through the Housing Assistance program help to bridge the gap between sheltering and permanent housing. These funds are for limited basic home repairs and replacement of essential household items, as well as rental payments for temporary housing. This assistance brings residences back to a basic level of "safe and sanitary living or functioning condition," and may not account for the full extent of the home's damage or need. DCA obtained Individual Assistance data from FEMA, and the data is current as of November 22, 2022. The data shows Spalding County and Henry County having the greatest amounts of IHP assistance. Overall, throughout the 7-county disaster-impacted area, the total amount of IHP

assistance dispersed is $5,296,127. Of that $4,488,310 was dispersed for HA and $807,817 for ON. The total figures can be seen in the table below:

Figure 3: FEMA IA Assistance Summary			
County	**$ IHP**	**$HA**	**$ON**
Butts County	$298,603	$258,041	$40,562
Henry County	$743,152	$687,824	$55,328
Jasper County	$167,825	$160,837	$6,988
Meriwether County	$304,158	$273,968	$30,190
Newton County	$227,314	$208,702	$18,612
Spalding County	$3,464,501	$2,823,311	$641,190
Troup County	$90,574	$75,627	$14,947
Total	**$5,296,127**	**$4,488,310**	**$807,817**

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

Figure 4: HUD Damage Categories	
Category	FEMA inspected real property damage
Minor-Low	< $3,000
Minor-High	$3,000 - $7,999
Major-Low	$8,000 - $14,999 and/or 1 to 3.9 feet of flooding on the first floor
Major-High	$15,000 - $28,800 and/or 4 to 5.9 feet of flooding on the first floor
Severe	> $28,800 or determined destroyed and/or 6 or more feet of flooding on the first floor

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the multipliers provided by HUD for the State of Georgia (seen in the table below). The multipliers use the median real property damage repair costs determined by SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster. By multiplying the number of units by the multipliers, the housing unmet needs were calculated.

Only FEMA-inspected real property damage of $8,000 or above is utilized to calculate the total housing unmet needs. HUD constitutes said amounts as high levels of damage and, as such, homes in the "major-low" category or higher are regarded as serious unmet needs. As indicated in the table below, the

summation of serious unmet needs for housing totals $8,236,138 in damages for those that fell in the Major-Low, Major-High, and Severe categories.

Figure 5: Total Damage Using HUD Unmet Needs Multipliers			
Category of Damage	**Number of Units**	**Serious Unmet Needs Multipliers**	**Total Unmet Needs**
Major-Low	55	52,961	$2,912,855
Major-High	27	82,582	$2,229,714
Severe	23	134,503	$3,093,569
Total	105		$8,236,138

Additional Housing Unmet Need:

Impact assessment methodologies have often utilized SBA estimates of damage and repair needs, FEMA IA Housing Assistance data, and National Flood Insurance data in combination to triangulate and identify more accurate levels of unmet need than if the FEMA estimated losses were the sole source of information. Unfortunately, DCA was unable to obtain NFIP data for this disaster at the time of the development of this Action Plan. Therefore, DCA will use a combination of FEMA and limited SBA data to calculate a comprehensive Unmet Needs amount.

FEMA Individual Assistance data reflects the impact of a disaster on a population by illustrating the number of registrations and the number of households ultimately approved for housing assistance. This data shows us where the damage is found and indicates the broad, concentrated areas of need and the estimated cost to repair each site. While this method is useful, this data lacks an accurate scale and leaves additional unmet needs unaccounted for.

Utilizing SBA loan values as an indicator of the amount of support any individual household will require to fully repair their homes again provides a more comprehensive look at recovery than simply looking at FEMA-inspected damage. SBA sends construction specialists trained to evaluate a more detailed determination of the current market cost to repair or replace a damaged structure. They also include up to 20 percent in costs for mitigation or resiliency needs to support a more comprehensive and often higher dollar estimate of recovery than that coming from FEMA. Although the SBA estimates are the greater of the two data sets, the figure is still likely an underestimate. HUD-assisted homes will fund greater levels of energy efficiency, resilience, or mitigation, causing the costs to be greater. The following two tables estimate additional unmet need that are not accounted for:

Figure 6: FEMA Applicants with No SBA Loan, No Insurance, and FVL >$0	
FEMA Applicants - No SBA Loan, No Insurance, and FVL >$0	5,148
Average SBA Loan Amount	$39,306
Estimated Unmet Need	$202,347,288

Figure 7: Unfunded SBA Loans	
Total Applications Approved	160
Total Applications Declined or Withdrawn	403
Average SBA Loan	$39,306
Estimated Unmet Need	$15,840,318

These totals, with an added 15% for resiliency measures, less the FEMA Individual Housing Program funds ($5,351,839) and SBA ($6,289,100) aid provided, give the remaining unmet need for housing as approximately $248,746,367.

Figure 8: Housing Unmet Need	
HUD Calculation of Unmet Needs	$8,236,138
Additional Unmet Need	$218,187,606
Resilience Factor (15%)	$33,963,562
Less Funds Provided by FEMA/SBA	-$11,640,939
Total Estimated Unmet Need	$248,746,367

(1) Single Family v. Multi-Family Needs; Owner Occupied v. Tenant.

Impact by Housing Ownership Status:

Of the 8,490 FEMA applicants, 4,823 (57%) were homeowners, 3,636 (42%) were renters, and 31 (1%) did not disclose this information. This information indicates a greater impact on homeowners than on renters.

FEMA IA Owner-Occupied

FEMA IA for owner-occupied units represents a total of $5,140,535 in FEMA-verified loss. Twenty-six percent (26%) of applicants received inspections, of which forty-four percent (44%) were found to have damage, and seventy-four percent (74%) received assistance. Owners from Spalding County submitted the most applications at 1,709, of which eleven percent (11%) received assistance. Spalding County had the highest FEMA-verified loss, totaling $2,997,598. Henry County submitted the second-highest number of applications at 1,258, of which six percent (6%) received assistance. Henry County had the second-highest FEMA-verified loss, totaling $903,937.

Figure 9: Individual Assistance (IA) - Owner Occupied						
County	# of Applicants	# of Inspections	# of Inspections with Damage	# of Homeowners that Received Assistance	FEMA Verified Loss (FV) (Total)	FEMA Verified Loss (FVL) (Average)
Butts	390	113	52	36	$522,495	$10,048
Henry	1,258	262	118	83	$903,937	$7,660
Jasper	201	62	33	26	$161,605	$4,897
Meriwether	236	101	49	39	$277,238	$5,658
Newton	596	84	34	26	$186,706	$549
Spalding	1,709	556	249	194	$2,997,598	$12,309
Troup	433	78	18	9	$90,956	$5,053

FEMA IA Tenants Applications

FEMA IA Assistance for renter-occupied units represents a total of $917,938 in FEMA-verified losses. Fifty-eight percent (58%) of applicants received inspections, fifty-four percent (54%) of applicants were found to have damage, and forty-two percent (42%) of applicants received assistance. Renters from Spalding County submitted the most applications, of which twenty-nine percent (29%) received assistance. Spalding County also had the highest FEMA-verified loss, totaling $806,071.

Figure 10: Individual Assistance (IA) - Renter Occupied						
County	# of Applicants	# of Inspections	# of Inspections with Damage	# of Renters that Received Assistance	FEMA Verified Loss (FVL) (Total)	FEMA Verified Loss (FVL) (Average)
Butts	150	75	56	22	$22,829	$408
Henry	414	228	160	30	$25,207	$158
Jasper	29	15	13	1	$0	$0
Meriwether	81	4	14	11	$27,148	$1,939
Newton	164	85	73	9	$12,437	$1,065
Spalding	2,608	1,527	757	385	$806,072	$1,065
Troup	190	116	52	20	$24,244	$466

FEMA IA Applications by Housing Type

Applications from house/duplex accounted for about sixty-two percent (62%) of applications, while about sixteen percent (16%) were townhomes, about eleven percent (11%) were apartments, and nearly seven percent (7%) were from mobile homes.

Figure 11: Individual Assistance (IA) - Applications by Housing Type	
Residence Type	**# of Applicants**
Apartment	901
Assisted Living Facility	3
Condo	41
Correctional Facility	1
House/Duplex	5,264
Military Housing	1
Mobile Home	571
Other	289
Townhouse	1,393
Travel Trailer	26
Total Residence Type	**8,490**

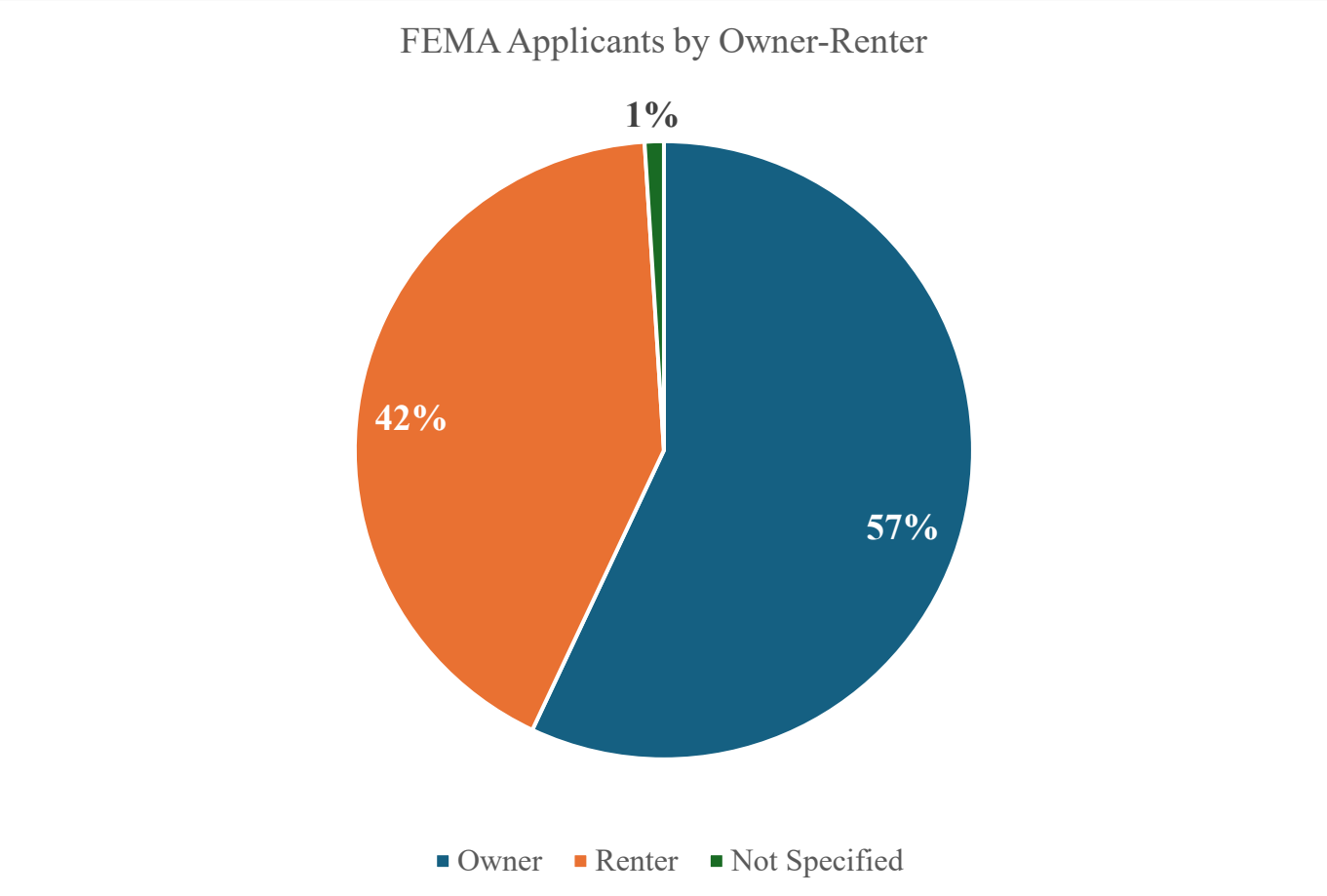


Figure 12

FEMA Homes Destroyed

While performing inspections, FEMA documents when residences are destroyed. According to data provided by FEMA, 18 homeowner residences and 22 rental units were destroyed.

Figure 13: FEMA - Destroyed Homes		
County	**Owner Occupied**	**Renter Occupied**
Butts County	2	2
Henry County	3	1
Jasper County	0	0
Meriwether County	2	1
Newton County	1	0
Spalding County	10	18
Troup County	0	0

Rental Housing - Affordable Rents, Income Limits, and Affordability Periods

The following information will apply to all rental housing:

Affordable Rents:

Units that are identified to meet the LMI National Objective in a project must be rented to people with verified LMI income and are subject to the 65 percent HOME rent limits for the affordability period.

Income Limits:

Assisted units may only be rented to households with an annual income that is less than 80 percent of the Area Median Income (AMI), as published annually.

Figure 14: Program Affordability Periods	
Rental Housing Activity Affordability Period Per Housing Unit ($ of CDBG-DR funds)	**Minimum Affordability Period in Years**
Less than $15,000	5
$15,000 - $40,000	10
Greater than $40,000	15
New Construction	20

(2) Public Housing and Affordable Housing.

DCA has reached out to several public housing authorities with limited success. Griffin Housing Authority provided the storm impact information detailed in the tables below. DCA also contacted multiple affordable housing communities across the disaster area, with limited success, to determine if they were impacted by the tornadoes. For those communities that responded to requests for information,

there was a determination that most of the housing was not directly impacted by the tornadoes. In the few cases where impact was felt, the damage has been repaired successfully.

Multifamily Assisted Housing

Type of Damage	# of Properties	# of Units	# of Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	0.00	0.00	0.00	0.00	$0.00
Minor-High	0.00	0.00	0.00	0.00	$0.00
Major-Low	0.00	0.00	0.00	0.00	$0.00
Major-High	0.00	0.00	0.00	0.00	$0.00
Severe	0.00	0.00	0.00	0.00	$0.00
Total	0.00	0.00	0.00	0.00	$0.00

Data Source(s): Individual property management companies for HUD-assisted properties in affected communities
*FEMA does not inspect rental units for real property damage, so personal property damage is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D.

Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Spalding County/City of Griffin	5.00	1.00	2.00	$0.00
Total	5.00	1.00	2.00	

Data Source(s): Griffin Housing Authority

Income Demographics

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Median Household Income	$72,837.00	$61,600.00	$57,367.00
Per Capita Income	$38,378.00	$30,748.00	$35,823.00

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018- 2022

Income Demographics – Low Income

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	1,348,344.00	70,650.00	12,412.00

Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018- 2022

LMI Analysis - Overall

Category	Total LMI Persons	Total Population	Percent LMI
Area wide	**4,169,270.00**	**10,711,908.00**	**39.13%**
Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018- 2022			

LMI Analysis – Federally Declared Disaster Areas

County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Butts County	8,890.00	25,522.00	34.83%	0.00	0.00	0.00%
Henry County	82,370.00	240,853.00	34.20%	0.00	0.00	0.00%
Jasper County	8,050.00	14,882.00	54.09%	0.00	0.00	0.00%
Meriwether County	8,930.00	20,679.00	43.18%	0.00	0.00	0.00%
Newton County	49,555.00	113,298.00	43.74%	0.00	0.00	0.00%
Spalding County	0.00	0.00	0.00%	36,755.00	67,415.00	54.52%
Troup County	25,700.00	69,527.00	36.96%	0.00	0.00	0.00%
Total	**183,495.00**	**484,761.00**	**37.85%**	**36,755.00**	**67,415.00**	**54.52%**
Data Source(s): U.S. Census Bureau American Community Survey (ACS) 5-year dataset 2018- 2022						

Manufactured Housing Units Impacted by Disaster

County/Municipality	Number of Units	% of Total Units in County/Municipality	Remaining Unmet Need
Butts County	67.00	7.40%	$107,331.00
Henry County	170.00	6.50%	$127,710.00
Jasper County	55.00	5.20%	$326,314.00
Meriwether County	85.00	3.70%	$41,853.00
Newton County	30.00	2.00%	$188,358.00
Spalding County	174.00	10.90%	$158,696.00
Troup County	16.00	1.00%	$7,147.00
Total	597.00	36.70%	$957,409.00
Data Source(s): ACS/FEMA			

Point-in-Time Count – Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless

Area wide	3,374.00	1,780.00	5,535.00	10,689.00
FEMA Declared	76.00	5.00	223.00	304.00
MID	16.00	0.00	34.00	50.00
Data Source(s): 2022 HIC Counts by State (National Alliance to End Homelessness) DCA Statewide Point Time Count Homeless Report for 2022				

Point-in-Time Count – Impacted by Disaster

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Area wide	0.00	0.00	0.00	0.00
FEMA Declared	0.00	0.00	0.00	0.00
MID	0.00	0.00	0.00	0.00
Data Source(s): Balance of State Continuum of Care. Information related to emergency shelters, transitional housing, and homeless population impacted directly by the disaster was not available at the time of publishing.				

Assisted Housing Impacted by the Disaster

County/ Municipality	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
All	0.00	0.00	0.00	0.00	0.00	0.00	$0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	$0.00
Data Source(s): Georgia Department of Community Affairs - Housing Finance and Development Division. Information related to Housing Choice Voucher (HCV) units directly impacted by the disaster was not available at the time of publication. No LIHTC units were reported to have been impacted directly by the disaster. Public Housing units were identified in a previous section.							

b. Infrastructure Unmet Need.

Disaster Damage and Impacts - Infrastructure.

Georgia's January 2023 tornadoes caused extensive damage to infrastructure, including downed power poles, impaired roads, damaged facility buildings, and other wreckage to infrastructure systems. Many roads sustained damage from large trucks during the hauling of materials to and from local landfills as a consequence of the disaster. Moreover, deficiencies in radio tower transmittance were also exposed as communications during and in the aftermath of the disaster were spotty and, at times, unreliable.

Conditions Pre-Disaster

Prior to the disaster, DCA acknowledged in its Consolidated Plan the significant demand for community infrastructure in Georgia, which included water and wastewater systems, as well as public facilities and

services. Georgia was rated a "C+" in infrastructure according to the American Society of Civil Engineers (ASCE). The 2019 Georgia Infrastructure Report Card assessed 14 categories of infrastructure to determine this cumulative grade. Some of Georgia's lowest ratings are in dams ("D"), wastewater ("D+"), and transit ("D+"), all of which fall into the "poor" category.

With $2.7 billion in wastewater needs, upgrades to Georgia's wastewater treatment systems are necessary to meet evolving water quality standards as the wastewater infrastructure continues to age. Also notable are the 535 dams in the state with a high-hazard potential designation.

Other infrastructure categories that leave considerable room for improvement include roads ("C+"), solid waste ("C"), and stormwater ("C-"). Since the implementation of the Bipartisan Infrastructure Law, $5.6 billion has been announced in funding for roads and bridges, $361 million for water, and $1.5 billion in public transit in the State of Georgia.

Calculating Infrastructure Unmet Need

Using FEMA and Georgia Emergency Management Agency/Homeland Security (GEMA/HS) data, DCA has preliminarily identified approximately 95 damaged infrastructure sites with a total estimated repair cost of $42.8 million across all public assistance categories A-G. The federal share is calculated at $32.1 million in funding and will be provided for approved projects.

The infrastructure categories include:

Category A: Debris Removal

Category B: Emergency Protective Measures

Category C: Roads and Bridges

Category D: Water Control Facilities

Category E: Buildings and Equipment

Category F: Utilities

Category G: Parks, Recreational, and Other Facilities

To calculate unmet needs for infrastructure projects, DCA used data obtained as of March 20, 2024, from FEMA's Public Assistance Program, which showed the amount needed to repair permanent public infrastructure (Categories C to G) to its pre-disaster condition. The program pays 75 percent of the project cost, leaving a remaining 25 percent (25%) non-federal share (Local Match). An additional 15 percent (15%) of the "Estimated PA Cost" is added in for resiliency efforts. Based on this data, the total infrastructure unmet need is $6,004,521 (Local Match + Resiliency) in identified infrastructure damage eligible under FEMA-PA Categories C-G. DCA will continue to work with the communities to identify any remaining infrastructure unmet needs related to the January 2023 tornadoes.

Figure 15: Damaged Sites Cost by PA Category						
PA Category	**# Damaged Sites**	**Sum of Approximate PA Cost**	**Sum of Non-Federal Share (Local Match)**	**Sum of Federal Share**	**Sum of Resiliency**	**Total Unmet Need**
A - Debris	34	$23,627,376	$5,906,844	$17,720,532	$3,544,000	$9,450,844
B - Emergency Measures	30	$4,250,669	$1,062,667	$3,188,002	$638,000	$1,700,667
C- Roads and Bridges	8	$1,045,497	$261,374	$784,122	$157,000	$418,374
D - Water Control Facilities	1	$41,195	$10,299	$30,896	$6,000	$16,299
E - Building and Equipment	6	$198,955	$49,724	$149,172	$30,000	$79,724
F - Utilities	16	$13,724,498	$3,431,124	$10,293,374	$2,059,000	$5,490,124
G - Other	0	$0	$0	$0	$0	$0
Total	**95**	**$42,888,190**	**$10,722,032**	**$32,166,098**	**$6,434,000**	**$17,156,032**
Total Unmet Need (C-G Categories Only)						**$6,004,521**
Data Source(s): FEMA PA Data						

Infrastructure Allocation of Funds

Although there is demonstrated unmet need, DCA is currently not proposing a distribution of funds geared directly towards infrastructure under this allocation. Given the feedback provided by impacted counties, the limited availability of funds, and DCA's evaluation of the unmet needs assessment, funds for recovery efforts will be focused on the housing sector rather than on infrastructure. DCA may reconsider the feasibility of addressing infrastructure directly, provided that additional funds emerge and/or compelling evidence suggests the need to shift or reevaluate priorities in response to unmet needs.

Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	$17,720,532.00	$5,906,844.00	$3,544,000.00	$9,450,844.00
B - Emergency Measures	$3,188,001.00	$1,062,667.00	$638,000.00	$1,700,667.00
C - Roads and Bridges	$784,122.00	$261,374.00	$157,000.00	$418,374.00
D - Water Control Facilities	$30,896.00	$10,299.00	$6,000.00	$16,299.00
E - Building and Equipment	$149,172.00	$49,724.00	$30,000.00	$79,724.00
F - Utilities	$10,293,374.00	$3,431,124.00	$2,059,000.00	$5,490,124.00
G - Other	$0.00	$0.00	$0.00	$0.00
Total	**$32,166,097.00**	**$10,722,032.00**	**$6,434,000.00**	**$17,156,032.00**
Data Source(s): FEMA PA Data				

Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need
None	**$0.00**	**N/A**	**$0.00**
Total			
Data Source(s): No projects were identified at the time of publishing.			

c. Economic Revitalization Unmet Need.

Disaster Damage and Impacts - Economic Revitalization.

The economic impact of the January tornadoes in 2023 was significant on both a local government and individual scale. The Congressional Research Service examined the fiscal effects of disasters on local governments, highlighting decreased property and income tax revenue as a potential consequence. As history has illustrated, disaster-related damage may reduce property assessments and, in turn, property tax revenue, while business closures could lead to a reduction in income tax revenue due to employment

loss. Other sectors could also be in jeopardy as adjusted budgets seek to offset potential losses in local government tax revenue by reducing funding for other critical operating systems, like schools.

Focusing through a closer lens highlights the economic drawback of disasters that directly impact individuals on a more palpable scale in terms of job losses as business operations suffer. With that comes food and shelter insecurity, as household income also reaches a new level of vulnerability. As a consequence of the disaster, power outages led to food spoilage, and some impacted families had to rely on community support from volunteers who provided meals and gift cards for groceries.

Conditions Pre-Disaster

All counties, except Henry and Newton, have a higher percentage of people in poverty and a lower percentage of citizens in the labor force than the State of Georgia. This is relevant when noting the economic status of these counties prior to the disaster. According to the Government Accountability Office, research has demonstrated that poverty can negatively impact economic growth in terms of human capital, which encompasses the education, work experience, training, and health of the workforce. Poverty increases the risks for poor health, crime, and social unrest, which can lead to reduced participation in the labor market. This can also be seen in the table below, as counties with a higher percentage of poverty were also associated with a lower percentage in the labor force compared to the statistics demonstrated at the state level.

Figure 16: Business and Economy Trends Prior to Disaster

County	Total employer establishments, 2021[1]	Total employment, 2021[1]	In civilian labor force, total, percent of population age 16 years (2018-2022)[2]	Persons in poverty[3]
Butts County	410	5,681	51.4%	13.2%
Henry County	4,489	58,577	66.2%	8%
Jasper County	202	1,691	58.3%	12.9%
Meriwether County	319	3,008	51.2%	16.6%
Newton County	1,600	20,564	64.5%	12.3%
Spalding County	1,221	17,043	56.5%	19.3%
Troup County	1,676	33,289	60.0%	17.8%
State-wide	253,729	4,034,309	62.9%	12.7%

Data Source(s): [1]U.S. Census Bureau, County Business Patterns. Updated annually. County Business Patterns (CBP) Includes U.S., States, and Counties; includes Puerto Rico and Municipios (county-equivalents). [2]U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates. The PRCS is part of the Census Bureau's ACS, customized for Puerto Rico. Both Surveys are updated every year. [3]QuickFacts uses data from the following sources: National level - Current Population Survey, Annual Social and Economic Supplement (CPS ASEC); State level and Puerto Rico- American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 1-year estimates; County level (U.S.) - The Small Area Income and Poverty Insurance Estimates (SAIPE), 1-year estimates; County-equivalents (municipios) for Puerto Rico - Puerto Rico Community Survey (PRCS), 5- year estimates; Sub-county level: Cities, towns and census designated places (U.S.) - ACS, 5- year estimates; Puerto Rico sub-counties (zonas urbanas and comunidades) - Puerto Rico Community Survey (PRCS), 5-year estimates.

SBA Loan Analysis

Many businesses were impacted by the January 2023 tornadoes. Damage included building impairments and the loss of inventory and/or equipment. Following the tornadoes, the SBA made low-interest loans available through the Business Physical Disaster Loan program and the Economic Injury Disaster Loan (EIDL) program.

The Business Physical Disaster loan program is available to businesses of any size and most non-profit organizations. The EIDL is available to small businesses when SBA decides that the business would be unable to obtain credit elsewhere. These loans provide the necessary working capital to help these businesses meet obligations and pay ordinary, reasonable operating expenses. Businesses can qualify for both loans with a combined loan amount of up to $2,000,000.

The tables below summarize the loans received and approved by the SBA. Approval for a loan does not indicate acceptance or place a requirement on a business to accept the loan. As shown below, Spalding County had the highest number of loan applications submitted and approved, and received the largest amount of funds.

Figure 17: SBA Loan Applications

County	# of Business Physical Disaster Loan Applications Submitted	# of Business Physical Disaster Loan Applications Approved	# of EIDL Applications Submitted	# of EIDL Applications Approved
Butts County	10	0	0	0
Henry County	31	2	33	3
Jasper County	3	1	0	0
Meriwether County	3	0	2	0
Newton County	2	2	11	1
Spalding County	102	12	40	4
Troup County	19	3	9	0
Total	180	20	95	8

Figure 18: SBA Loan Amounts (per county)

County	Business Physical Disaster	EIDL	Total
Butts County	$0	$0	$0
Henry County	$48,100	$546,200	$594,300
Jasper County	$5,000	$0	$5,000
Meriwether County	$0	$0	$0

Newton County	$40,000	$2,500	$42,500
Spalding County	$2,479,400	$89,400	$2,568,800
Troup County	$234,000	$0	$234,000
Total	$2,806,500	$638,100	$3,444,600

Using the number of denied and withdrawn SBA loans (Business Physical Disaster & EIDL) multiplied by the average loan amount provides an estimated $29,391,294 in economic revitalization unmet need, as shown in the table below:

Figure 19: SBA Loans Denied or Withdrawn			
Business Physical Disaster Loans - denied or withdrawn	**Average Loan Amount**	**EIDLs - denied or withdrawn**	**Average Loan Amount**
160	$140,325	87	$79,762
Total Unmet Need (per type of loan)	$22,452,000		$6,939,294
Grand Total of Estimated Unmet Need	**$29,391,294**		

Economic Revitalization Allocation of Funds

Although DCA would like to address every unmet need identified in its assessment, there is limited bandwidth for CDBG-DR funds to be effectively utilized. As such, economic revitalization will not be addressed directly under this allocation. DCA will reevaluate this stance as needed in the event of differing circumstances, such as a change in the availability of funds or other significant developments.

d. Mitigation Needs Assessment.

According to the Federal Register Notice's and updated Universal Notice, as amended, 15 percent of the CDBG-DR funds awarded for this disaster are set aside for mitigation activities. With the addition of the plus-up funds allocated to Georgia for this disaster, mitigation accounts for $2,862,000 of the budget.

DCA will incorporate mitigation measures while implementing the proposed housing programs during the construction, reconstruction, or rehabilitation phases of projects. One example of this is retrofitting existing structures to mitigate the effects of wind events. Georgia identified structural retrofits as one of their mitigation action items in the Hazard Mitigation Strategy Plan, which DCA will adopt to improve resilience against wind-related hazards. In this way, these eligible recovery activities have a direct tie-back to the disaster and act as mitigation activities for the purposes of fulfilling the Mitigation Set-Aside

requirement. HUD defines mitigation activities as those 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." This is DCA's ultimate objective in creating these fortified housing structures in the eligible impacted counties.

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.

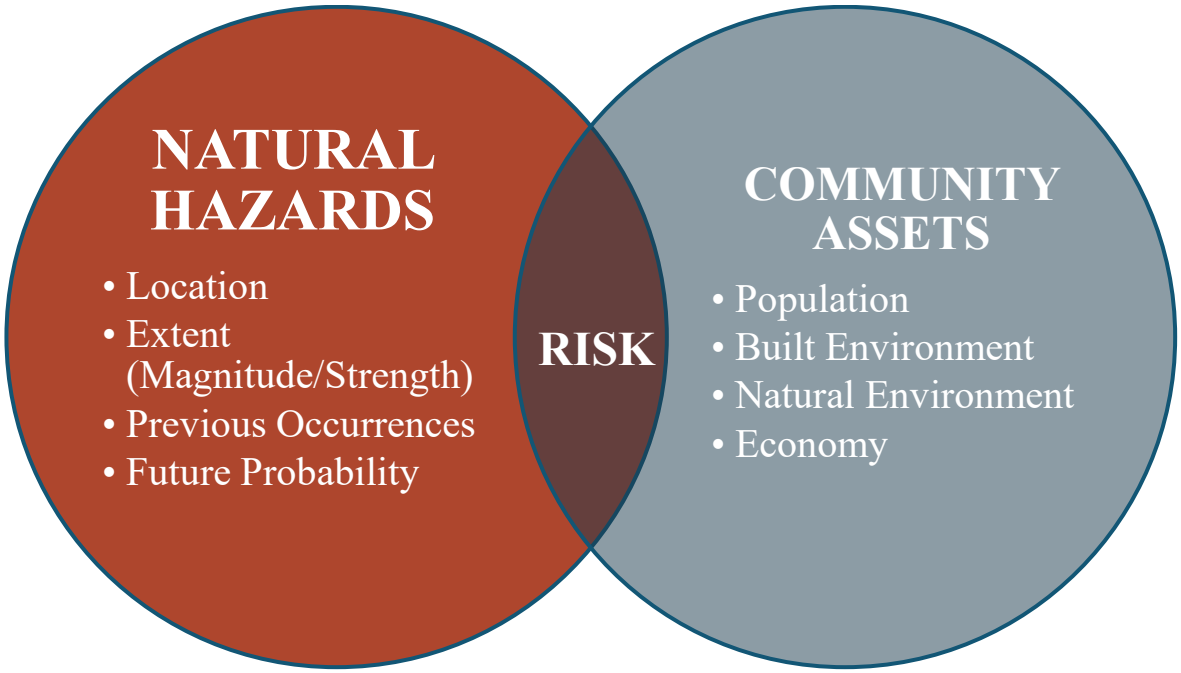
To mitigate long-term disaster damage and avoid a cycle of destruction and rebuilding, the state has implemented Hazard Mitigation Planning, which provides a framework for risk-based decision-making to protect lives, property, and the economy. The most recent Georgia Hazard Mitigation Strategy (GHMS) 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 tornadoes. It also includes specific strategies for mitigating the impacts of winds, flooding, and tornadoes, which are directly relevant to the recent disaster events in the state.

The **GHMS** plan provides a clear connection of programs and projects to the mitigation needs of the HUD and State-identified counties impacted by the 2023 Tornadoes disaster. This plan was prepared by GEMA/HS and is available on their website.

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, 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 offers a structured approach to understanding and prioritizing the risks posed by various hazards in Georgia, thereby informing mitigation strategies and planning efforts.



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

Figure 20: Natural Hazard / Community Asset Overlap Image (Source: GHMS)

Hazard Risk Assessments

GHMS employs hazard risk assessments for various identified hazards. It also includes a timeline of notable events and maps of all previous events and losses, as well as maps of potential events.

Discussion of Community Lifelines is included for each hazard type in the GHMS as well as information on critical facilities and state facilities that may be exposed. This information helps inform a mitigation strategy that utilizes a "Community Lifelines" approach to disaster recovery.

According to the GHMS, Georgia is most susceptible 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 comprehensive assessment of prioritization, ranking, associated hazards, and community lifelines, 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.

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, lightning	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 21: Hazard Assessment Ranks and Priorities by Hazard Type (Source: GMHS)

Susceptibility Analysis

Community Lifelines

FEMA defines Community Lifelines as services that enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security. When Community Lifelines are disrupted, the community's overall functionality is compromised. Lifelines are understood to be interdependent, as the destabilization of one often impacts or even

destabilizes another. FEMA identifies eight core community lifelines: 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 GHMS includes a discussion of potentially impacted Community Lifelines for each identified hazard, which includes its location, potential related hazards, the scope of impact, and a discussion of the impact. This information will be utilized to ensure the mitigation strategy related to the 2023 Tornadoes is comprehensive and recognizes the ways in which lifelines are interdependent.

Following tornadoes or wind hazards, the communication community lifeline is threatened, as both landline and cellular services are often destabilized. GHMS identified the electric grid as a potential vulnerability in the event of a tornado. The destruction sustained within the path of a tornado can be significant, including damage to power lines, which can have long-lasting effects, particularly if they impact a substation or main trunk line. This could limit an individual's ability to purchase food and other essential supplies if local businesses experience a power disruption. Also, transportation options may be limited due to inoperable streetlights, which can make travel difficult when attempting to purchase essential supplies.

Notably, landline communication is subject to failure during high-wind events due to utility poles breaking, trees and limbs falling onto lines, and the loss of cellular service during severe weather events. Energy, or the electrical grid, is another asset that is susceptible to high wind. As described in the GHMS, overhead power lines are susceptible to failure due to several causes, including trees and tree limbs falling onto lines, poles breaking, and vehicle-related accidents where lines run alongside roads (such as vehicle collisions with poles). The impact of wind on the electrical grid following the 2023 Tornadoes lay bare how much devastation this hazard can cause.

Overview of Hazard Mitigation Needs by Program Area.

Mitigation Needs – Housing

Hazard – Inland Flooding

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) Structures	• NFIP Insured • At least two paid losses of $1,000 in any ten-year period (since 1978)
Severe Repetitive Loss (SRL) Structures	• 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 22: RL vs SRL Structures

Areas where there are National Flood Insurance Program insurance-related Repetitive Loss (NFIP RL) structures are depicted in the map below within the seven eligible HUD and MID counties. Properties with a history of frequent flood claim losses are potential targets for mitigation actions.

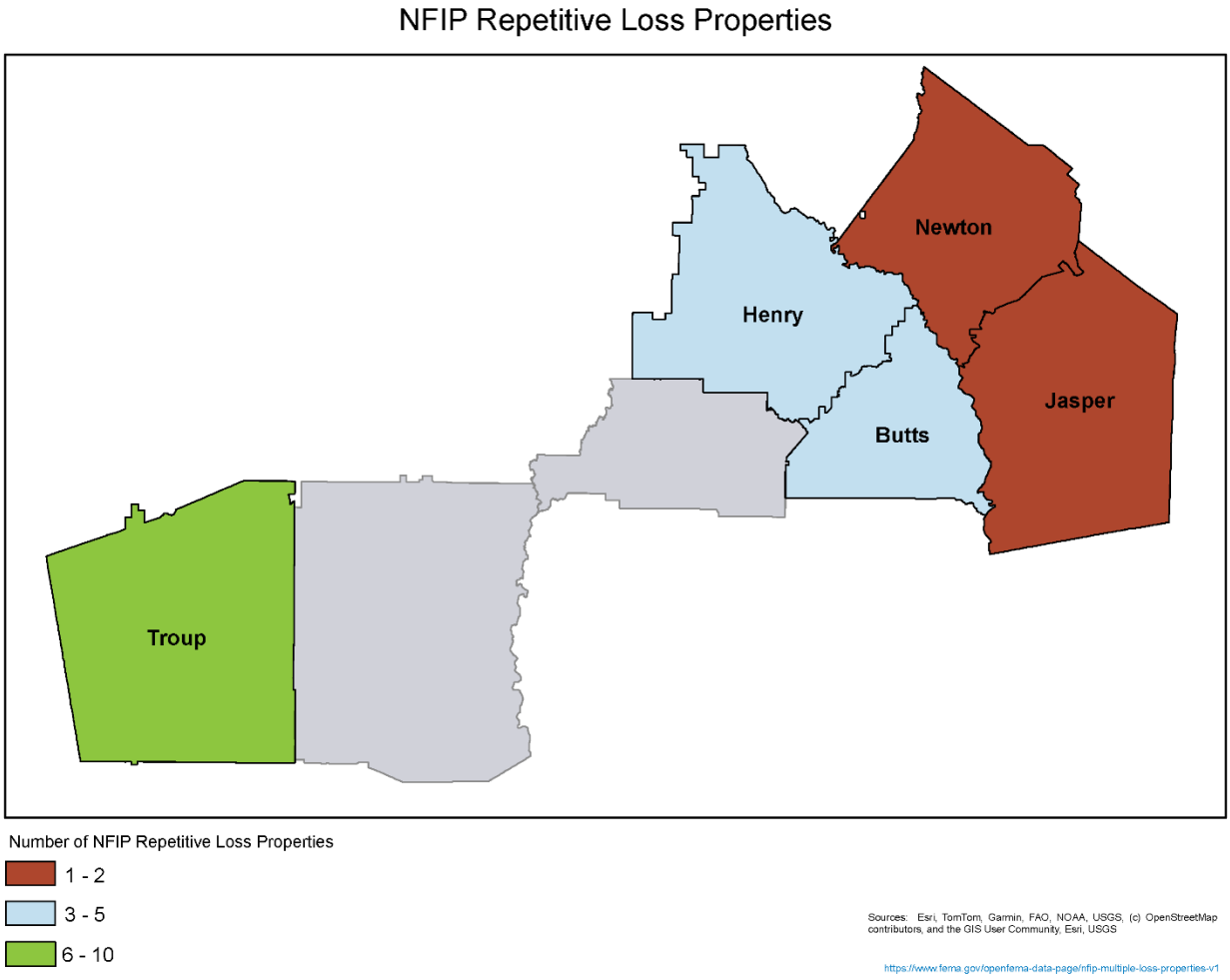


Figure 23: NFIP Repetitive Loss Properties Map

MID Counties that have severe repetitive loss properties include:

Repetitive Loss Properties		
County	**Total Amount Paid**	**Total Number of Properties**
Butts	$80,134.19	3
Henry	$136,044.87	3
Jasper	$27,818.04	1
Newton	$129,174.69	3
Troup	$818,002.66	8

Source: GHMS

Figure 24: Repetitive Losses by County

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 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 and elevation.

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 metropolitan area; however, the entire State of Georgia has experienced losses from flooding.

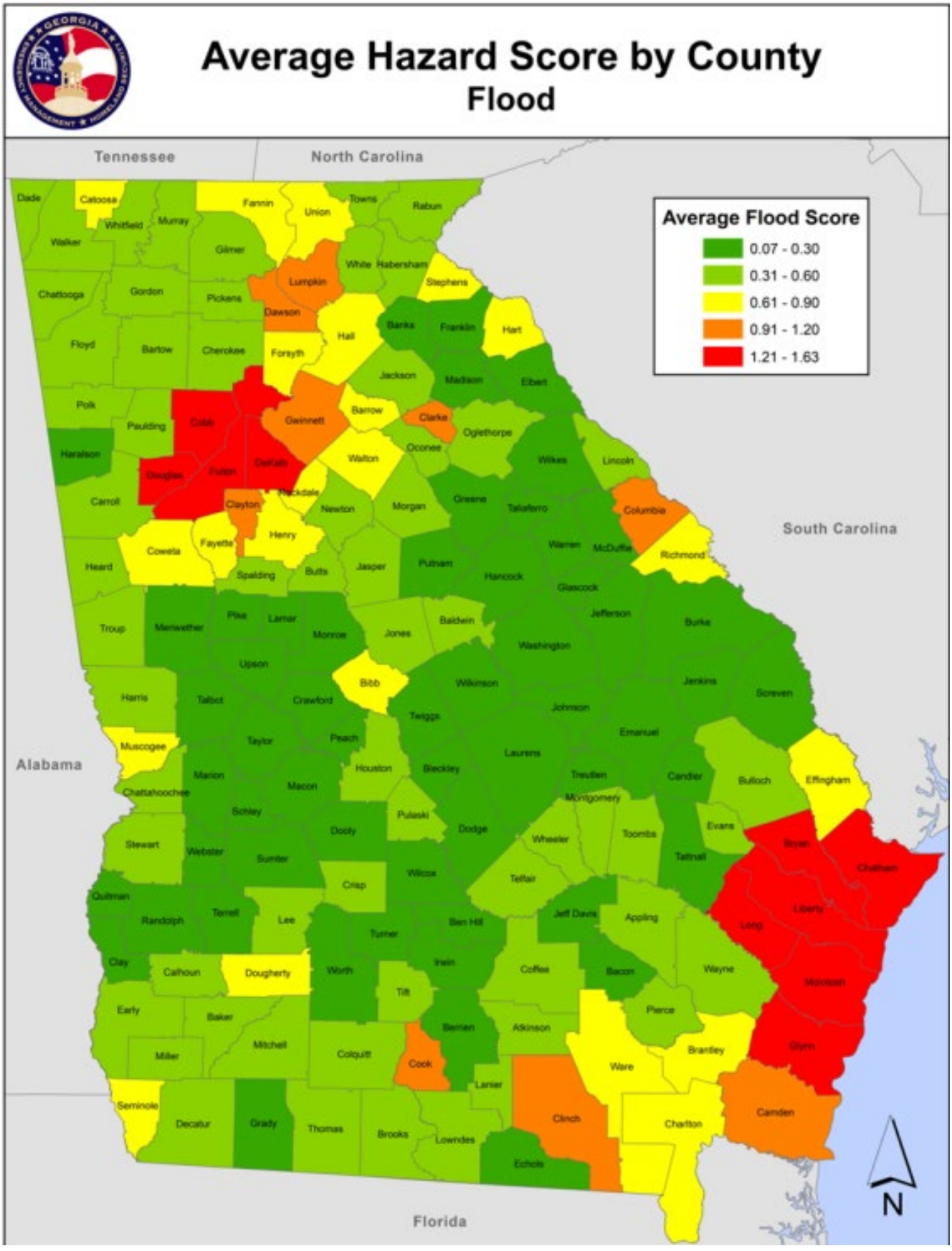

Average Hazard Score by County
Flood
Tennessee
North Carolina
South Carolina
Alabama
Florida
Average Flood Score
0.07 - 0.30
0.31 - 0.60
0.61 - 0.90
0.91 - 1.20
1.21 - 1.63
Dade
Catoosa
Whitfield
Murray
Walker
Fannin
Union
Towns
Rabun
Gilmer
White
Habersham
Stephens
Lumpkin
Chattooga
Gordon
Pickens
Dawson
Hall
Banks
Franklin
Hart
Floyd
Bartow
Cherokee
Forsyth
Jackson
Madison
Elbert
Polk
Paulding
Cobb
Gwinnett
Barrow
Clarke
Oglethorpe
Haralson
Douglas
Fulton
DeKalb
Walton
Oconee
Wilkes
Lincoln
Carroll
Rockdale
Clayton
Newton
Morgan
Greene
Taliaferro
Columbia
Coweta
Fayette
Henry
Warren
McDuffie
Richmond
Heard
Spalding
Butts
Jasper
Putnam
Hancock
Glascock
Troup
Meriwether
Pike
Lamar
Monroe
Jones
Baldwin
Jefferson
Burke
Upson
Washington
Harris
Talbot
Crawford
Bibb
Wilkinson
Jenkins
Screven
Twiggs
Johnson
Muscogee
Taylor
Peach
Emanuel
Laurens
Marion
Houston
Bleckley
Treutlen
Candler
Bulloch
Effingham
Chattahoochee
Macon
Montgomery
Schley
Pulaski
Dodge
Wheeler
Toombs
Evans
Stewart
Webster
Dooly
Sumter
Tattnall
Bryan
Chatham
Wilcox
Telfair
Quitman
Crisp
Liberty
Randolph
Terrell
Lee
Ben Hill
Jeff Davis
Appling
Long
Turner
Clay
Calhoun
Dougherty
Worth
Irwin
Coffee
Bacon
Wayne
McIntosh
Tift
Early
Baker
Berrien
Atkinson
Pierce
Glynn
Miller
Mitchell
Colquitt
Cook
Brantley
Ware
Lanier
Seminole
Decatur
Grady
Thomas
Brooks
Lowndes
Clinch
Charlton
Camden
Echols
N

Figure 25: Average Hazard Score by County from Flooding

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 inclusion of drainage improvements in mitigation strategies. As no CDBG-DR funds have been allocated for infrastructure, mitigation efforts will be established through alternative avenues that still increase resilience in the state and help reduce the long-term risk of damage to and loss of property.

Hazard – Wind

With winds reaching as high as 155 mph during the January 2023 tornado events, this hazard was experienced across the 7-county MID region in the form of thunderstorms and strong winds. One asset particularly susceptible to high winds is the electrical grid. Overhead power lines are susceptible to damage from wind gusts and from trees and tree limbs falling on lines. Electrical poles are susceptible to damage from direct winds or vehicle accidents where power lines run alongside roads. This damage can often cause a power failure. While many newer developments use underground lines, older developments are usually served by overhead power lines. Also, while newer developments often feature underground power lines, they are typically served by overhead power lines that lead 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 experience more power outages, as well as which counties have a higher percentage of their customers reporting power outages. *PowerOutage.us* also reported that Georgia currently has the 11th most power outages in the US and ranks 17th for the percentage of customers affected nationwide.

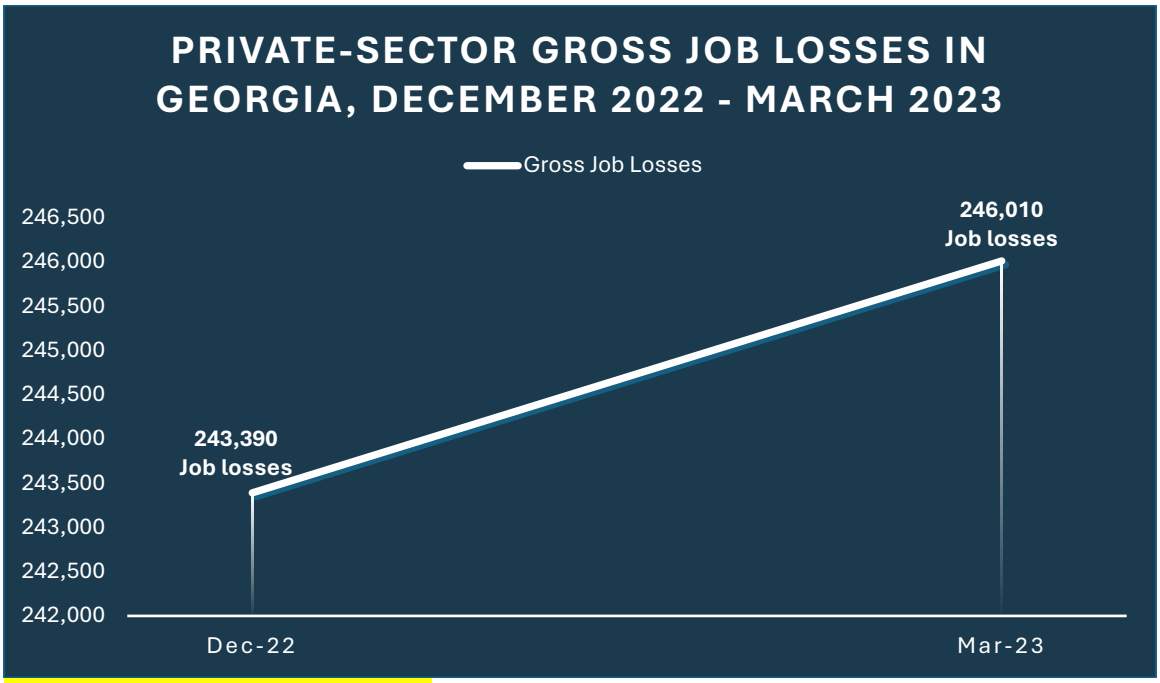
Troup County is among the top ten counties based on the number of locally defined Critical Facilities exposed to >90 mph wind gusts. This speaks to the Wind hazard that could potentially impact its 227 critical facilities valued at around $1,261,009,712 as reported in the GHMS. Including mitigation measures, such as structural retrofits, could provide residents with additional protection from high-wind events.

Mitigation Needs – Economic Revitalization

Small Business Susceptibility and Employment Impact by Hazard Category

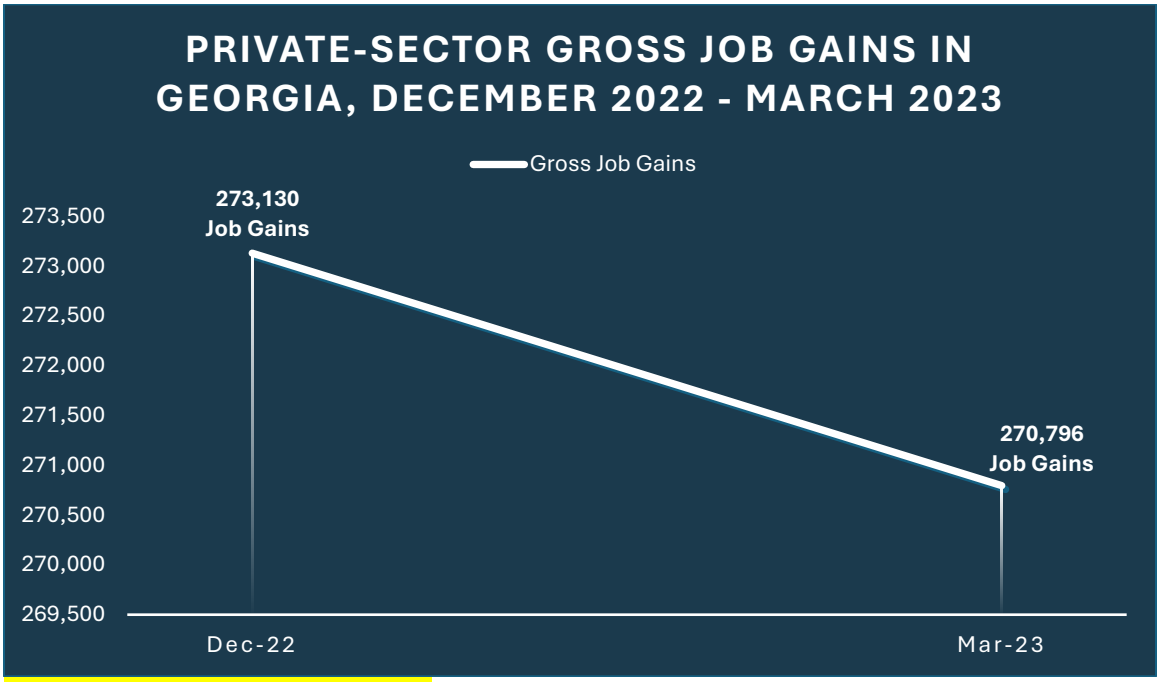
According to the U.S. Bureau of Labor Statistics' Quarterly Census of Employment and Wages, the first-quarter 2023 report, covering the period from January 2023 to March 2023, showed 2,620 more job losses in Georgia than the quarter prior. Job gains were also down by 2,334 compared to the previous quarter. These figures are depicted in **Figures 26** and **27** below. While gross job losses represented 6.0 percent of private-sector employment in Georgia, the national gross job losses accounted for only 5.5 percent. This time frame covers the period during which the 2023 Tornadoes occurred and may illustrate

the conditions businesses and residences alike experienced within that timespan and in the aftermath of the storm.



Source: U.S. Bureau of Labor Statistics.

Figure 26: Line Graph of Job Losses



Source: U.S. Bureau of Labor Statistics.

Figure 27: Line Graph of Job Gains

Mitigation Needs Summary.

According to the GHMS plan, tornadoes have the highest vulnerability ranking among all 13 natural hazards, with a score of 34 indicating a “high” priority level. Tornadoes also tied the highest with “severe weather” for historical impact, with a score of 10. Excluding Coastal flooding, drought, and landslides due to a lack of available data, tornadoes accounted for 62 percent of total hazard-attributed injuries and fatalities, more than all the other hazards combined.

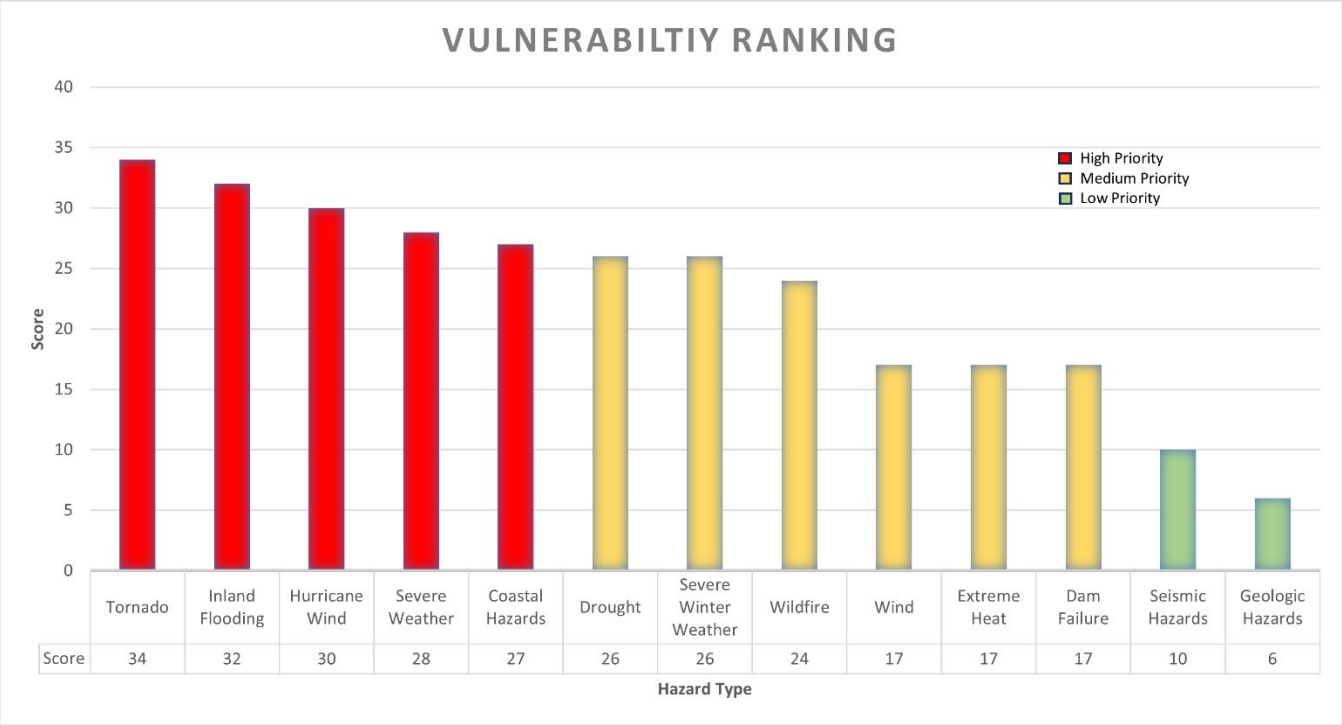


Figure 28

Tornadoes can be inherently unpredictable, which in part adds to their threat. Not limited to a particular season or locality, tornadoes can occur anywhere in Georgia at any time, with little to no warning. Its duration can range anywhere from a few minutes to a few hours, many occurring in a series rather than as a singular entity. As seen with this disaster, this often leads to an outbreak of tornadoes within a window of time, with strong winds having the power to flatten trees and structures and cast objects hundreds of yards.

By utilizing CDBG-DR funds to continue integrating housing hazard mitigation strategies, 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.

DCA 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 susceptible areas. DCA remains committed to reducing risks and enhancing resilience across all sectors. The ongoing collaboration among state agencies, local communities, and organizations will ensure that mitigation strategies are not only effective but also inclusive, prioritizing the safety and well-being of all residents, businesses, and communities, particularly those most vulnerable to future disasters. DCA plans to allocate mitigation set-aside funds to the Housing Programs. The table below illustrates the mitigation need based on the percentage of 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%)	$37,311,955	$0	$37,311,955	
TOTAL – Housing	**$37,311,955**	**$0**	**$37,311,955**	88%
Infrastructure Mitigation				
Permanent Work (Cat. C-G) 15%	$900,678	$0	$900,678	
TOTAL – Infrastructure	**$900,678**	**$0**	**$900,678**	2%
Economic Revitalization Mitigation				
Econ. Mitigation	$4,408,694	$0	$4,408,694	
TOTAL – Econ. Revit.	**$4,408,694**	**$0**	**$4,408,694**	10%
GRAND TOTAL	**$42,621,327**	**$0**	**$42,621,327**	

3. General Requirements

a. Citizen Participation.

Outreach and Engagement.

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

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 communal meeting where DCA invited all seven HUD and State-identified MID communities. DCA staff presented at the Historic Griffin City Hall

on February 7, 2024. Those communities that participated were encouraged to share any relevant information or sentiments pertaining to the January 2023 tornadoes with DCA. Contact information, including email and phone numbers, was also exchanged to establish open lines of communication between DCA and the communities throughout this process. DCA regional representatives also played a key role during this process, communicating with impacted communities throughout January and leading up to the initial meeting. These outreach efforts garnered pertinent information that helped further the establishment of this action plan.

In addition to the activities above, DCA has published this action plan on Community Development Block Grant Disaster Recovery Program (CDBG-DR) for a 30-day public comment period. Citizens were notified through DCA and/or local governments in the MID area, utilizing electronic mailings, press releases on websites, and/or social media.

Those wishing to submit written public comments on the initial 2023 CDBG-DR Action Plan or subsequent substantial amendments to the plan may do so via email at CDBG-DR@dca.ga.gov or mail comments to the following address:

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

Appendix B of this document summarizes citizen comments on this action plan and DCA responses.

For more information, citizens can refer to DCA's citizen participation plan, which can be found at CDBG-DR Citizen Participation Plan.

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.

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.

Public hearings.

During the 30-day public comment period, DCA will hold a public hearing, available both virtually and in person, on the proposed action plan. The hearing will take place during two time-slotted sessions, allowing participants to choose the one that suits them better. Each MID and State-identified community will receive a reasonable amount of prior notice, along with a link providing access to the virtual event, via email. The purpose of the hearing is to provide an opportunity for public engagement on the

allocation of funds for the January 2023 tornadoes in Georgia. Questions will be allowed in real-time, with DCA responding directly to all attendees with answers. The Action Plan is available on DCA's public website, where citizens can provide comments over a 30-day period after its posting.

DCA will solicit input from citizens during this public hearing. All comments (both written and oral) will be recorded and submitted to the action plan. Although all comments will be considered, they may not ultimately affect programmatic decisions.

DCA conducted a hybrid model public hearing at two (2) different times in a Section 504-compliant location, in Spalding County, the HUD-identified MID area. A morning and afternoon session was conducted, with in-person and virtual options offered at both times. DCA staff monitored virtual participation and responded to both in-person and virtual questions in real-time. A PowerPoint presentation was available on screen for both in-person and virtual attendees, with verbal description or reading of the data provided by the meeting facilitator.

Complaints.

Complaints alleging violation of fair housing laws will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). DCA will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on dca.ga.gov to demonstrate that adequate procedures are in place to prevent fraud, waste, and abuse.

Citizens may file a written complaint or appeal through the CDBG-DR email at CDBG-DR@dca.ga.gov or submit via mail to:

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

Any complaints received in writing, including those submitted via email, are considered formal complaints. Verbal complaints are considered informal and may not be subject to the same resolution procedures as outlined in this section. DCA's goal is to attempt to resolve all complaints, both formal and informal, in a manner that is both sensitive to the complainants' concerns and achieves a fair result. DCA will make every effort to provide a timely written response within 15 working days of receipt of the complaint, where practicable, and maintain a record of complaints filed and any processes followed, in accordance. An explanation will be provided if any additional time is taken for a response beyond the 15 days.

Some circumstances constitute an appeal, while others solicit a complaint. Generally, dissidence regarding a programmatic decision or stance made by DCA or the appointed responsible party may be submitted in the form of an appeal. Alternatively, a complaint in this regard refers to a grievance one has and finds reason to report. During the course of administering a program activity, disputes may arise. One may file an appeal if they believe there is just cause. DCA and its subrecipients do not have the

authority to grant an appeal to a regulatory, statutory, or HUD-specified CDBG-DR requirement. Approved policies adopted by DCA are generally not subject to an appeal.

Applicants seeking further information can refer to the DCA program manuals applicable under this CDBG-DR allocation.

b. Public Website.

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, and 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: Community Development Block Grant Disaster Recovery Program (CDBG-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 enable robust citizen participation and full transparency in CDBG-DR-funded activities. These documents will be available in a form accessible to persons with disabilities.

The Disaster Recovery Website is accessible to persons with disabilities in compliance with Section 504, Title II of the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, Executive Order 13166, and Section 508 of the Rehabilitation Act of 1973. Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, DCA will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any necessary changes to policies and procedures. At a minimum, updates will be made quarterly.

DCA maintains compliance with ADA requirements for website accessibility and readability.

Subrecipient and Partner Contact

DCA will enter a subrecipient agreement with Georgia Heirs Property Law Center to provide legal services to individual applicants participating in HRRP. Information regarding their services can be found below:

Georgia Heirs Contact Information	
Website:	gaheirsproperty.org
Address:	54 Ellis St NE, Atlanta, GA 30303
Phone:	(706)424-7557
Email:	INFO@GAHEIRSPROPERTY.ORG

DCA Website Accessibility

DCA's website can be translated into many languages. Below is a screenshot from DCA's website as it is translated into Spanish.

Screen Image - Translated Webpage

DCA's website complies with Section 508 of the Rehabilitation Act of 1973, ensuring that its content is accessible to people with disabilities. Section 508 requires that individuals with disabilities be able to access and use information and data on a website in a manner comparable to how people without disabilities can access and use that information and data, unless it causes the agency an undue burden.

Individuals using assistive technology (such as screen readers or Braille readers) are encouraged to contact CDBG-DR@dca.ga.gov if they experience issues accessing information on the website. Supporting information, such as the URL (web address) of the material needed for access and the individual's contact information, should also be included.

c. Amendments.

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.

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,
- The allocation or reallocation of $3 million or more,
- A proposed reduction in the overall benefit requirement, or
- An update to the submitted initial Action Plan if the original submission was incomplete (i.e., program award caps or funding criteria).

When DCA pursues the substantial amendment process, the amendment will be posted here at 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. 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 do not require posting for public comment. DCA will notify HUD five (5) business days prior to the change taking effect.

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

d. Displacement of Persons and Other Entities.

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this action plan, DCA will coordinate with the applicable agencies and entities to minimize displacement. Should any proposed projects or activities cause the displacement of people, the following policy has been adopted to ensure the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, are met.

DCA develops all programs with the intention of minimizing the displacement of persons or entities, in accordance with its existing CDBG-DR Residential Anti-displacement and Relocation Assistance Plan (RARAP). DCA will amend the existing RARAP to reflect the requirements and applicable waivers and requirements as modified in Section III.B.15 of the updated Universal Notice, as amended.

Displacement policies and procedures apply to both property owners and renters. Should any proposed projects or activities result in the displacement of people, the appropriate policies will be adopted to ensure that the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, are met. DCA will include detailed policies and procedures for situations where proposed projects or activities may potentially cause the displacement of people or other entities.

CDBG-DR funds may 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.

e. Protection of People and Property.

DCA has a responsibility to protect people and property while fulfilling the obligations set forth by the grant requirements for CDBG-DR funds.

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

- Construction standards will be based on Georgia's Construction Code Program and must meet or exceed applicable requirements.
- Construction will comply with a Green Building Standard for all new construction of residential buildings and for all repairs of substantially damaged residential buildings. The state will require that all new construction or repair of substantially damaged residential buildings meet an

industry-recognized standard that has achieved certification under at least one of the programs listed in paragraph B.32.a of Section VI. (83 FR 5850 and 83 FR 5861).

- For rehabilitation of non-substantially damaged buildings (where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab), the state will follow the Green Building Retrofit Checklist. Note that this requirement does not apply when Energy Star, WaterSense-labeled, or FEMP-designated products are not available (83 FR 5850 and 83 FR 5861).
- DCA will provide a mechanism for homeowners to appeal the quality of the rehabilitation work. DCA will require a warranty period post-construction for housing, with all work being performed by the contractor. Information about the complainant's rights and how to file a complaint or appeal regarding the quality of work will be printed on program applications and/or guidelines. Complaints should be submitted to the local government subrecipient and responded to in a timely manner. Records of each complaint will be kept on file.

In maintaining these standards, DCA seeks to protect people and property from harm by mitigating damage that may result from future disasters. This includes implementing measures to mitigate hazard risks, as demonstrated in the forthcoming sections regarding elevation standards, flood insurance requirements, construction standards, contractors' standards, preparedness, mitigation and resilience strategies, broadband infrastructure in housing, and the evaluation of cost-effectiveness.

Elevation standards.

The cost to rehabilitate a property, including any costs associated with elevation, must not exceed $160,000. If it is necessary to reconstruct a property, the cap remains the same and cannot exceed $280,000, including the cost of elevation. The average cost of elevating a home can range from $20,000 to $100,000, depending on various factors related to the project. Taking these averages into consideration, elevations will be allowed up to $60,000, and on a case-by-case basis, to ensure the method is cost-effective. DCA may re-evaluate the elevation cost caps during the implementation of a program, based on average costs associated with elevating homes and on a case-by-case basis as needed. When elevation occurs, the subrecipient must ensure that the accessibility for persons with disabilities is preserved. Elevation standards will be required if the structure is substantially damaged or substantially improved.

Elevation may be achieved through a variety of methods, including, but not limited to, elevating on continuous foundation walls and open foundation systems (such as piles, piers, or columns). Programs should ensure that contractors' design foundations are depicted to properly address all loads and be appropriately connected to the floor structure above the foundation. Utilities should also be properly elevated. All elevation activities must be completed prior to any rehabilitation, reconstruction, or replacement and must comply with all applicable state and local building codes. Any elevation information (including the expected cost) should be included in a work write-up. As previously

mentioned in the "Mitigation Only Activities" section, homes will be designed to help withstand high wind events.

Flood Insurance Requirements.

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). DCA may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance, and then that person failed to obtain or allowed their flood insurance to lapse for the property. DCA is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120% AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance, they may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% AMI or the national median and has unmet recovery needs.

Property owners assisted through HRRP will be required to acquire and maintain flood insurance if their properties are located in a FEMA-designated floodplain. This requirement is mandated to protect the safety of residents and their property and the investment of federal dollars. The state will ensure adherence to Section 582 of the National Flood Insurance Reform Act regarding the responsibility to inform property owners receiving disaster assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee of the requirement to obtain and maintain flood insurance, and that the transferring owner may be liable if he or she fails to do so. By achieving the goals within this Action Plan and initiating strong and energy efficient building codes the state guarantees a more successful long term disaster recovery, thus ensuring a strong, healthy environment and the safety and welfare of the citizens.

Construction Standards.

DCA will require quality and code compliance inspections on all projects, emphasizing high-quality, durable, sustainable, and energy-efficient construction methods and materials. Site inspections will also be required to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction for residential purposes must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

Green and Resilient Building Standards:

- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance, or Neighborhood Development)
- ICC- 700 National Green Building Standards
- Any other equivalent comprehensive green building standard program acceptable to HUD

Minimum Energy Efficiency Standard:

- Energy STAR (Certified Homes or Multifamily High Risk)
- EPA Indoor AirPlus
- Any other equivalent minimum energy efficiency standard acceptable to HUD

DCA will utilize industry-standard guidelines for the proposed programs or activities.

For rehabilitation of non-substantially damaged residential buildings, DCA will follow the guidelines to the extent applicable as specified in the HUD CPD Green Building Retrofit Checklist. Substantial Damage is defined by 44 CFR 59.1 as: "Damage of any origin sustained by a structure whereby the cost of restoring the structure to its before damaged condition would equal or exceed 50 percent of the market value of the structure before the damage occurred." When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, DCA will encourage, to the extent practicable, implementation of industry-appropriate standards.

To ensure that construction costs are reasonable and consistent with market costs at the time and location of construction, DCA or a contracted vendor will utilize cost-estimating software to create a list of common materials for housing rehabilitation or reconstruction. To ensure the prices generated by the software are accurate, DCA or a contracted vendor will request that local contractors interested in becoming qualified vendors prepare price estimates for those materials. DCA, or a contracted vendor, will not share the price list generated by the estimating software with the proposed bidders. DCA staff or a contracted vendor will review the differences between the two sets and set the standard for the costs.

Contractors Standards.

Contractors selected under DCA will make every effort to provide opportunities to low- and very-low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. For more information on this HUD requirement, please see DCA's

adopted Section 3 Policy at: https://dca.georgia.gov/document/forms/section-3-policy/download. DCA will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

For subrecipients, the following policies and procedures are established to ensure full and open competition in the procurement of goods and services when CDBG-DR funds are used, in whole or in part, for the implementation of CDBG-DR projects at the local level. Note that DCA's procurement policies and procedures implement the requirements of 24 CFR 570.489 (g) for its Subrecipients, including:

- Full and open competition;
- Identification of Methods of Procurement and their applicability;
- Prohibition of cost plus a percentage of cost and percentage of construction costs methods;
- Assurance that all purchase orders and contracts include any clauses required by Federal statutes, Executive orders, and implementing regulations; and
- Subrecipient and contractor determinations shall be made in accordance with the standards in 2 CFR 200.330.

Generally, the governing statutes can be found in the State Purchasing Act (O.C.G.A. Section 50-5-50 et seq.). These rules govern the purchasing activities of all state government entities in Georgia. As DCA plans to administer state-implemented programs, contracted vendors will also be required to adhere to the state's procurement standards. The Georgia Department of Administrative Services, State Purchasing Division, publishes the Georgia Procurement Manual that governs all solicitations made by state government entities. A copy of the Georgia Procurement Manual (GPM-V10-July 2022) is provided with the Financial Management and Grant Management Certification documentation.

In the event of a dispute between a homeowner and a contractor concerning rehabilitation contract work, a homeowner can file an appeal regarding substandard or unfinished work before signing the Certificate of Final Completion.

Contractors are required to warrant their work for a period of one year from the date of the final inspection. As part of the activity completion process, the DCA or a contracted vendor should send a letter to the homeowner reminding them of the warranty. The letter should clearly outline the warranty's start and end dates and provide detailed instructions on how to resolve any warranty issues.

Preparedness, Mitigation and Resilience.

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.

Proactive mitigation policies and actions help reduce risk and create safer, more disaster-resilient communities. A more resilient community can adapt to changing conditions and prepare for, withstand, and rapidly recover from a disaster. In the past, DCA has partnered with GEMA and other relevant

organizations and entities, and will continue to do so in an effort to eliminate or reduce risk and vulnerability to natural hazards in the State of Georgia.

Moreover, the social vulnerability index synthesizes socioeconomic variables, which the research suggests contribute to a community's reduced ability to prepare for, respond to, and recover from hazards. SOVI data was used to help identify and strategically account for uneven capacity for preparedness and response. It also helped pinpoint where resources might be used most effectively to reduce the pre-existing vulnerability and encourage recovery where other market forces are less likely to be awarded other support.

DCA will encourage and support efforts in MID communities to update and strengthen local compliance codes, mitigating hazard risks associated with sea level rise, high winds, storm surge, and flooding, where applicable. CDBG-DR funds will be used for programs and activities that cover necessary expenses related to community long-term recovery, preparedness, and resilience against future disasters.

Broadband Infrastructure in Housing.

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

As noted above, DCA will not operate programs or activities that involve more than four (4) rental units.

Cost-Effectiveness.

Cost-effectiveness will be defined in the manual for each program offered with CDBG-DR funds.

Demonstrable Hardship and Exceptions

DCA has developed detailed program guidelines in the policies and procedures for HRRP and ARRP, as well as exceptions to the policies and procedures to address situations not considered during the program design phase. The exception policies and procedures will consider changes to the maximum award amounts for applicants who demonstrate undue hardship as well as other exceptional situations. Demonstrable hardship may include, but is not limited to, prolonged job loss, substantial reduction of household income, death of a family member on whom the surviving household was financially

dependent, illness, unexpected and extraordinary medical bills, disability, etc. DCA has defined "demonstrable hardship" and the exception policies in the program policies and procedures.

Not Suitable for Rehabilitation

DCA defines "not suitable for rehabilitation" as one of the two following definitions:

Residential properties that have experienced repetitive losses under NFIP. A repetitive loss property is an insurable building for which two or more claims of more than $1,000 were paid by the NFIP within any rolling 10-year period, since 1978.

Dwellings that are considered substandard and do not meet the recovery program's housing repair standards and/or federal, state, and local code requirements. The determination may be established based on the calculation that the cost of repair is close to or exceeds the cost to reconstruct.

After a damage assessment is conducted, it may be determined that the house is not structurally or economically feasible to rehabilitate. The activity may be approved for set-up as a reconstruction if one of the following conditions applies:

- The unit is unsuitable for rehabilitation, both structurally and economically; and/or
- The damage assessor is unable to enter a home due to hazardous conditions.

If reconstruction is appropriate based on the above criteria, DCA approval is required. This will be determined upon reviewing the application in the systems of record.

Duplication of Benefits.

In accordance with the Robert T. Stafford Act, as amended, DCA will implement existing policies and procedures to ensure no individual receives a duplication of benefit for the same purpose and/or effect to recover from 2023 Presidentially Declared Disasters. Federal law prohibits any person, business concern, or other entity from receiving Federal funds for any part of such loss for which the person has received financial assistance under any other program, from private insurance, charitable assistance, or any other source. To prevent duplication of benefits, DCA will require that all sources (federal, state, local, private, charitable) and amounts of disaster assistance received or reasonably anticipated be documented with the submission of an application for CDBG-DR funding. DCA will monitor and review the information provided to determine if any duplication may occur. Applicant awardees must subrogate any additional funds received for damage caused by the presidentially-declared disasters back to DCA.

4. Grantee Proposed Use of Funds

Overview.

DCA is the lead agency and responsible entity for administering a combined total of $21,941,000 in CDBG-DR funds allocated for disaster recovery. This amount is made up of the initial allocation of $12,595,000 and the $9,346,000 in plus-up funds for DR-4685. These programs included Housing, Infrastructure, Economic Revitalization, Public Services, Mitigation, Administration, and Planning. As detailed in the Unmet Needs Assessment section, the January 2023 tornadoes resulted in lamentable loss, and despite funds committed for emergency response and immediate recovery efforts, at least $284,142,182 in unmet needs remain based on existing data. While the unmet needs far exceed the CDBG-DR allocation, DCA has allocated funds toward the programs that will serve as a framework for recovery. All programs proposed under this allocation will meet a National Objective, with the exception of Planning and Administration. In addition, all activities are considered CDBG-DR eligible activities under Title I of the Housing and Community Development Act of 1974 (HCDA).

As the lead agency for administering the CDBG-DR funds, DCA will also act as the Responsible Entity for the purposes of 24 CFR Part 58. As such:

"The grantee will meet the applicable environmental requirements, listed under 24 CFR Part 58, before the use or commitment of funds for each activity. After DCA, as the Responsible Entity (RE), 1) completed the environmental review(s) pursuant to 24 CFR Part 58 and receives from HUD an approved Request for Release of Funds (RROF) and certification (as applicable), or 2) adopts another Federal agency's environmental review, approval, or permit and receives from HUD (or the state) an approved Request for Release of Funds and certification (as applicable), the grantee may draw down funds from the line of credit for an activity."

a. Program Budget

Program Category	Program	Budget	HUD identified MID Budget	Grantee identified MID Budget	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	Rehab	$16,669,250	$13,359,400	$3,339,850	76.11%	$280,000	LMI/Urgent Need	97
	Buyout	$0	$0	$0	0.00%	$0	N/A	N/A
	New Construction	$0	$0	$0	0.00%	$0	N/A	N/A
	Other	$0	$0	$0	0.00%	$0	N/A	N/A
Economic Revitalization	Workforce Training	$0	$0	$0	0.00%	$0	N/A	N/A
	Business Grants	$0	$0	$0	0.00%	$0	N/A	N/A
	Other	$0	$0	$0	0.00%	$0	N/A	N/A
Infrastructure	Water/sewer Improvements	$0	$0	$0	0.00%	$0	N/A	N/A
	Health Facilities	$0	$0	$0	0.00%	$0	N/A	N/A
	Other	$0	$0	$0	0.00%	$0	N/A	N/A
Public Services	Legal Services	$750,000	$600,000	$150,000	3.42%	$5,000	LMI/Urgent Need	150
	Housing Counseling	$0	$0	$0	0.00%	N/A	N/A	N/A
	Other	$0	$0	$0	0.00%	N/A	N/A	N/A
Mitigation	Mitigation	$2,862,000	$2,289,600	$572,400	13.04%	$0	N/A	N/A
Admin	Admin	$629,750	$503,800	$125,950	2.87%	$0	N/A	N/A
Planning	Planning	$1,000,000	$800,000	$200,000	4.56%	$1,000,000	N/A	7
Total		**$21,941,000**	**$17,552,800**	**$4,388,200**	**100.00%**			

Data Source(s): Unmet needs assessment

Connection to Unmet Needs.

As required by the Federal Register Notice's and updated Universal Notice, as amended, DCA will allocate at least 80 percent of the funds to address unmet needs with HUD-identified "most impacted and distressed" areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a DR-4685 presidential major disaster declaration.

This action plan primarily considers and addresses housing initiatives while incorporating mitigation activities throughout the program's implementation, as housing was largely recognized as having the greatest unmet need.

Despite the unmet infrastructure and economic revitalization needs, priority will be placed on housing programs to ensure impacted communities receive the help that is most vital to their exigencies. Specifically, these programs are, as previously mentioned, the Homeowner Rehabilitation and Reconstruction Program and the Affordable Rental Rehabilitation Program.

DCA will use the CDBG-DR funds for the 2023 disaster in a manner that complies with applicable statutes, including:

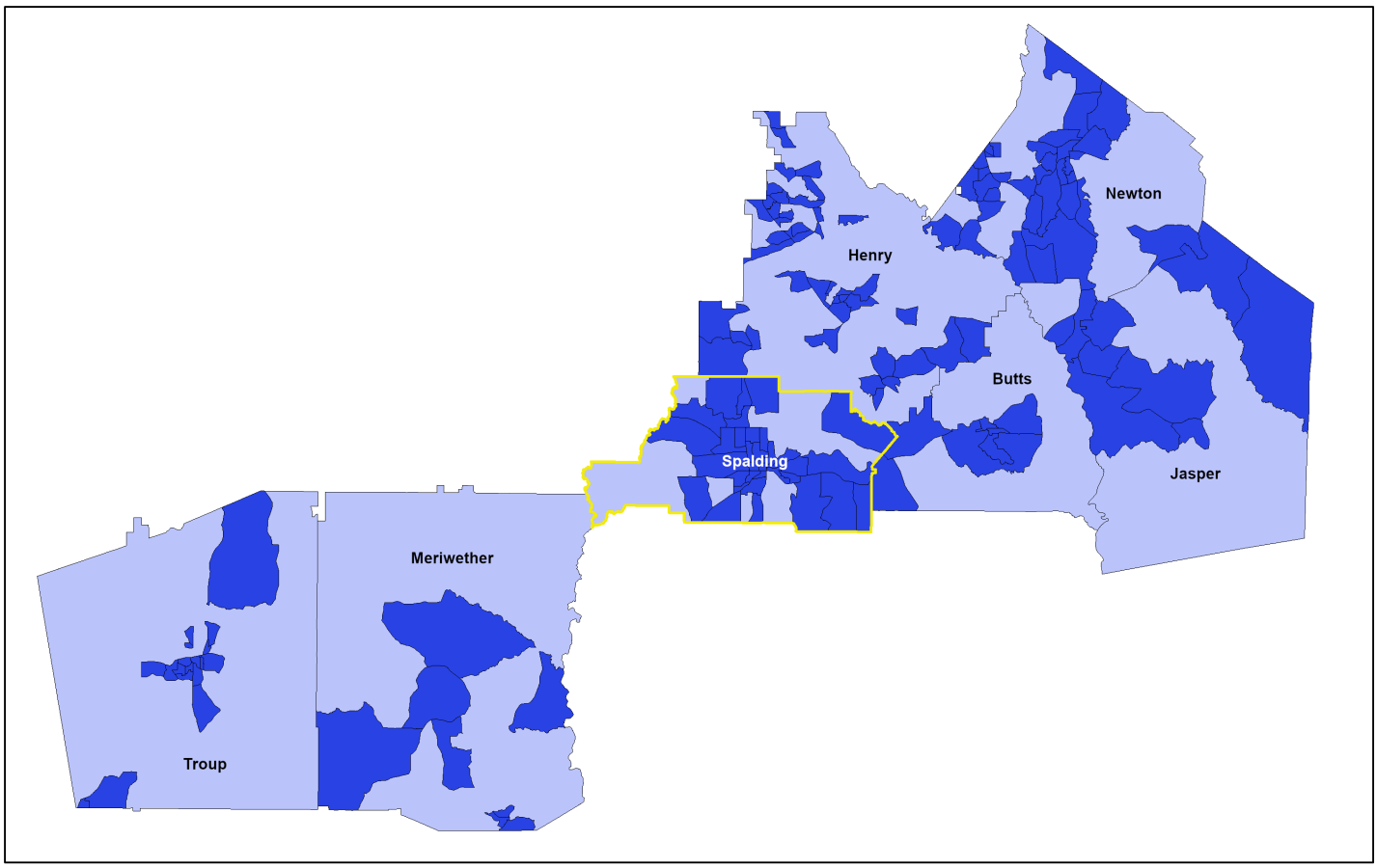
- Section 109 of the HCDA, 42 U.S.C. 5309;
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d *et seq*.;
- Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000d *et seq*.;
- Title VIII of the Civil Rights Act of 1968 (The Fair Housing Act), 42 U.S.C. 3601 – 19;
- Section 504 and 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794;
- The Americans with Disabilities Act of 1990, 42 U.S.C. 12131 et seq.; and
- Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) (PRWORA).

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 on the following page shows the LMI status of the affected counties by block group.

LMI Population by Block Group



10/2/2025

HUD-Identified Most Impacted and Distressed (MID) Areas

Areas with under 51% Low to Moderate Income Households

Areas with over 51% Low to Moderate Income Households

World_Hillshade

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, USGS

2016-2020 ACS

The tornadoes had a devastating impact on many LMI households across Metro Atlanta and Central Georgia. Most counties in Georgia have block groups where over half of the residents are LMI households, and recovery programs will implement a prioritization system to ensure that recovery efforts are fair and effective, focusing funds on the areas least able to recover with their existing resources.

Many residents, already struggling with limited financial means, now face the daunting task of rebuilding their lives with minimal resources. 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.

DCA will meet these overall benefit requirements as outlined below:

Homeowner Rehabilitation and Reconstruction Program:	**Overall benefit:** At a minimum, 70 percent of program funds will meet a low- and moderate-income national objective. Households with income higher than 120 percent of AMI will not be eligible for this program. Applicants will declare their income on the intake application, which will be verified by case managers. Applicants with incomes greater than 80 percent and less than 120 percent can be served under the Urgent Need objective.
Affordable Rental Rehabilitation Program:	**Overall benefit:** 100 percent of the Affordable Rental Rehabilitation Program units using CDBG-DR funds will be reserved for those tenants at or below HUD's income limits for 80 percent AMI.
Planning	**Overall benefit:** Georgia Emergency Management and Homeland Security Agency (GEMA/HS) has proposed an intergovernmental agreement (IGA) to assist affected communities in developing Disaster Recovery and Redevelopment Plans (DRRP). Development of these plans will include HUD-identified MID and grantee-identified MID communities; local stakeholders and elected officials will actively participate in the creation of the plans to ensure the plans are effective for their communities.

Leveraging Funds.

DCA anticipates leveraging CDBG-DR funds in conjunction with other funding sources, including FEMA and state/local funds. DCA will maximize relationships with other federal and state agencies, corporations, foundations, not-for-profits, and other stakeholders to identify means of leveraging all viable sources of funding. Additionally, DCA will continue to utilize inter-agency coordination in funding and activities.

The CDBG-DR funds will be used to address critical unmet needs that remain after other sources have been exhausted to prevent any duplication of benefits. The activities identified in this Action Plan were selected as eligible CDBG-DR activities to fill the gap left by other funding sources.

Program Partners.

Georgia Emergency Management and Homeland Security Agency (GEMA/HS) - GEMA/HS will utilize planning funds to assist communities with creating Disaster Recovery and Redevelopment Plans (DRRP). GEMA/HS has a solid history of working with communities in coastal Georgia and the 20-county area affected by Hurricane Michael (2018) to create and execute the DRRPs.

Georgia Heirs Property Law Center (GHPLC) - GHPLC will provide title search and title clearing assistance for the housing programs identified in this Action Plan. The Georgia Heirs Property Law Center (the "Center"), a 501(c) (3) nonprofit law firm, increases generational wealth, economic value, and community stability by securing and preserving the property rights of low- and moderate-income Georgians. Heirs property, a home or land with no clear title holder, is an unstable form of ownership that prevents storm victims from accessing disaster relief assistance and thwarts the efforts of municipalities to revitalize neighborhoods. The Center assists heir property owners, nonprofits, and municipalities in remedying fractured titles, increasing equity, and transferring wealth to the next generation through title clearing, estate planning, asset education, and facilitating access to government, private sector, and nonprofit home improvement and land management programs.

Distribution of Funds.

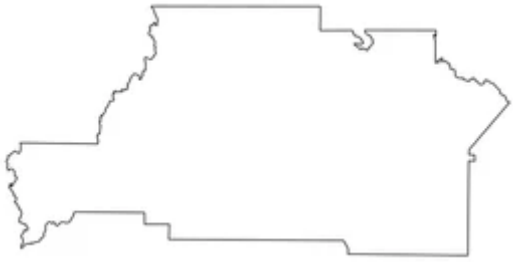
The Distribution of Funds outlines the allocation of resources based on multiple layers of need and prioritization. HUD has provided the State of Georgia with $12,595,000 in disaster recovery funds to address unmet needs and support recovery efforts following the January 2023 tornadoes. Additionally, $9,346,000 in plus-up funds was also allocated for this disaster, bringing the total to $21,941,000. CDBG-DR funds will be used for necessary expenses related to long-term recovery, restoration, and revitalization within the impacted areas. Due to the critical housing needs, DCA proposes creating programs within the housing sector while integrating mitigation efforts. The funds will be allocated to the following programs: Homeowner Rehabilitation and Reconstruction (70%), Affordable Rental Rehabilitation Program (30%). These state-implemented programs will be directly administered by DCA. In addition, the following activities will be undertaken:

Planning (~5%), Administration Costs (~3%), Mitigation (15%), and Public Services (~3.5%). DCA will administer "Public Services" programs through a subrecipient.

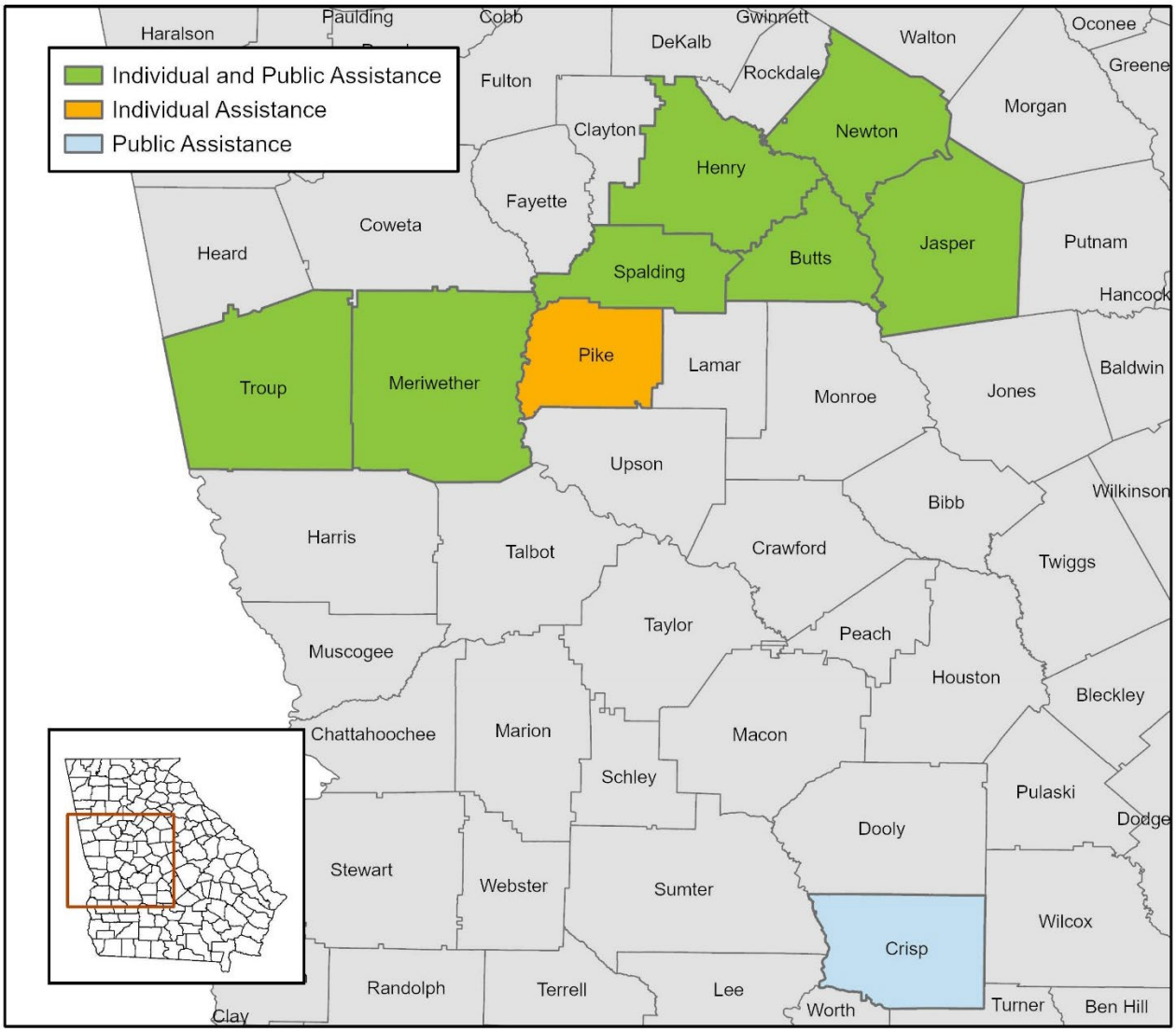
Eligible Communities

To prioritize limited funding in areas with the highest damage, HUD identified the zip code 30223 in Spalding County as Most Impacted and Distressed (MID). It is required that a minimum of 80 percent of the allocation must address unmet needs within the county that contains the zip code. DCA is expanding the HUD-identified MID zip code to include the entirety of Spalding County. When the emergency declaration was issued for Georgia, an additional six counties were designated for FEMA Public Assistance and Individual Assistance. Public Assistance grants were provided to governmental

units for emergency infrastructure repairs and debris removal. Individual Assistance grants provided emergency funding to individuals to fulfill immediate housing and safety needs. These six communities are eligible for the remaining 20 percent of CDBG-DR funding. These counties, along with a map of eligible areas, are shown below.

Figure 29: MID Areas	
HUD-Identified MID Area	**State/Grantee-Identified MID Area**
Spalding **Zip Code 30223** 	Butts County
	Henry County
	Jasper County
	Meriwether County
	Newton County
	Troup County

Individual and Public Assistance Counties | FEMA-4685



Georgia Department of Community Affairs

Figure 30

Redistribution of Funds

The table below reflects the addition of funds that were allocated to Georgia for the January tornadoes.

Redistribution of Funds: Substantial Amendment #1					
Program Category	**Program**	**Original Action Plan Budget**	**Amount Removed**	**Amount Added**	**Amended Budget**
Housing	Rehab	$8,572,250	-	$8,127,000	$16,699,250
	Buyout	$0	-	-	$0
	New Construction	$0	-	-	$0
	Other	$0	-	-	$0
Economic Revitalization	Workforce Training	$0	-	-	$0
	Business Grants	$0	-	-	$0
	Other	$0	-	-	$0
Infrastructure	Water/sewer Improvements	$0	-	-	$0
	Health Facilities	$0	-	-	$0
	Other	$0	-	-	$0
Public Services	Legal Services	$750,000	-	-	$750,000
	Housing Counseling	$0	-	-	$0
	Other	$0	-	-	$0
Mitigation	Mitigation	$1,643,000	-	$1,219,000	$2,862,000
Admin	Admin	$629,750	-	-	$629,750
Planning	Planning	$1,000,000	-	-	$1,000,000
Total		**$12,595,000**	-	**$9,346,000**	**$21,941,000**

Housing Recovery Efforts and Promoting Affordable Housing

DCA has created HRRP and the ARRP to facilitate the overall recovery from the January 2023 tornadoes, which support housing recovery efforts. Specifically, undertaking mitigation activities such as restoring, rebuilding, and constructing homes and rental properties provides a stable foundation that allows for housing recovery in impacted areas. These programs provide residents with the necessary resources to address some of the long-term recovery objectives related to the disaster's impacts.

Additionally, DCA is currently consulting with the local governments within the MID areas to determine the extent of unmet rental housing needs.

Proposed Programs:

Homeowner Rehabilitation and Reconstruction Program

National Objective	Benefit to low- and moderate-income persons and Urgent Need
CDBG-DR Eligible Activity	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.
CDBG-DR Allocation	$11,826,166
Projected Accomplishments	Estimated to serve 78 households
Proposed Start Date	July 2025
Proposed End Date	June 2028
Maximum Award	**Rehabilitation:** $100,000 | **Reconstruction:** $280,000
Administering Entity	DCA will administer this program directly through a prime vendor

Program Summary:

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster-resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. To promote long-term recovery and minimize damage from future disasters, this program may include mitigation measures, such as elevation and home hardening. The program also includes Temporary Housing Assistance, based on individual household needs and participation in HRRP, to be awarded on a case-by-case basis.

Environmental Review:

As the grantee, DCA is the responsible entity for all National Environmental Policy Act (NEPA) environmental review requirements.

Eligible Areas:

80 percent of these funds will be available for the MID areas; 20 percent will be available for the 6-County area declared eligible for Individual and Public Assistance.

Competitive Applications:

Competitive applications will not be used for this activity. Questions should be directed to CDBG-DR program staff.

Contact information is listed below:

MAIL	EMAIL
Georgia Department of Community Affairs Attention: CDBG-DR 60 Executive Park South, NE Atlanta, Georgia 30329	CDBG-DR@dca.ga.gov

Applicant Criteria:

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

- Must be a primary resident homeowner, no second homes allowed.
- A control measure will be put in place in the policies and procedures to prevent the resale of rehabilitated homes solely for profit.
- 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 with special needs or special accommodation requirements (e.g., those with disabilities). The State believes that these considerations create a fair prioritization system that complies with applicable rules and regulations. LMI applicants will be prioritized in the initial 45 days. DCA will accept applications from non-prioritized applicants when the application period opens, but they will not be processed until after the initial 45-day period. Additional funding criteria will be disclosed 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.
- Avoiding unjustified impediments by providing guidelines to ensure 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:

National Objective	Benefit to low-and moderate-income persons
CDBG-DR Eligible Activity	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
CDBG-DR Allocation	$4,873,084
Projected Accomplishments	Estimated to serve 19 households
Proposed Start Date	May 2026
Proposed End Date	May 2029
Maximum Award	$125,000 for rehabilitation; No more than 4 individual rental units per owner
Administering Entity	DCA will administer this program directly through a prime vendor

Program Summary:

Because rental units house a high percentage of underserved residents, DCA has allocated 30 percent of the CDBG-DR housing budget to serve rental rehabilitation. This program will serve a variety of needs and prevent greater homelessness in the communities most impacted by the disasters. Providing safe,

disaster-resistant housing for residents affected by the January 2023 tornadoes is crucial to the long-term recovery strategies of the eligible areas. The program's eligible activities will include the rehabilitation of existing rental housing units that were 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.

Environmental Review:

As the grantee, DCA is the responsible entity for all National Environmental Policy Act (NEPA) environmental review requirements.

Eligible Areas:

80 percent of these funds will be available for the MID areas; 20 percent will be available for the 6-County area declared eligible for Individual and Public Assistance.

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:

$125,000 for rehabilitation; up to 4 housing units per landlord.

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.
- Avoiding unjustified impediments by providing guidelines to ensure meaningful 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.

Public Services

National Objective	Benefit to low- and moderate-income persons and Urgent Need
CDBG-DR Eligible Activity	42 USC 5305(a)(8) - Provision of Public Services; 24 CFR 570.201(e) - Public services
CDBG-DR Allocation	$750,000
Projected Accomplishments	Estimated to serve 150 households
Proposed Start Date	January 2025
Proposed End Date	January 2027
Maximum Award	No project maximum
Administering Entity	DCA will administer through a subrecipient

Program Summary:

DCA hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove obstacles to applicant participation. DCA will enter into subrecipient agreements with a qualified non-profit agency to provide legal services to individual applicants for the HRRP and ARRP. Consideration will also be given to citizens with communication limitations, disabilities, those in need of mental health services, general health services, and translation services as needed.

Planning

National Objective	Planning
CDBG-DR Allocation	$1,000,000
Proposed Start Date	June 2025
Proposed End Date	June 2028
Administering Entity	DCA will partner with another governmental entity

Program Summary:

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, as well as the mitigation of hazard risks, including potential sea level rise, high winds, storm surge, and flooding.

Competitive Applications:

Competitive applications will not be used for this activity. Any questions should be directed to the CDBG-DR Program Staff.

Contact information is listed below:

MAIL	EMAIL
Georgia Department of Community Affairs Attention: CDBG-DR 60 Executive Park South, NE Atlanta, Georgia 30329	CDBG-DR@dca.ga.gov

Administration

CDBG-DR Allocation	$629,750
CDBG Eligible Activity	Program Administration Costs
Proposed Start Date	October 2024
Proposed End Date	June 2029
Administering Entity	DCA will administer directly

Program Summary:

As stated in the Federal Register Notice's and the updated Universal Notice, as amended, grantees can use up to 5 percent of the total grant award for grant administration. DCA has allocated 2.8 percent of the funds towards administration. This allocation will cover DCA's administrative costs to run the program. Costs incurred by subrecipients to run the programs will be charged as Activity Delivery Costs.

Program Income.

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

Resale or Recapture.

Procedures to Prevent Duplication of Benefits

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

DCA's CDBG-DR program will require a DOB analysis for each applicant to consider other disaster funding sources when processing applications. Common assistance funding sources include, but are not limited to:

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

DCA will consider assistance amounts received/approved from alternate sources such as FEMA, insurance coverage, SBA, and/or philanthropic organizations. DCA is in the process of establishing data-sharing agreements with HUD/FEMA and SBA to ensure the most recent assistance is used in DOB/VOB analyses.

The DCA duplication of benefits review process currently includes program-specific forms that each applicant will complete for all proposed CDBG-DR activities, prior to approval.

Additionally, DCA will have a subrogation clause in each applicant participation agreement. These agreements will be signed at the time of application, prior to receiving assistance. Per the subrogation clause, any funds found to be a DOB must be returned to DCA. Under this clause, should an applicant receive CDBG-DR funding to support an activity and subsequently receive outside funding that would represent a DOB, the duplicative CDBG-DR funds must be returned to the Community Finance Division of DCA. DCA may withhold payment on any project or outright suspend activities if a duplication of

benefits issue is not resolved in a timely manner. Furthermore, DCA will not initiate or complete contract close-out processing until any identified duplication of benefit issues are resolved to DCA's satisfaction.

b. Program Details.

Housing Program(s)

Affordable Rental Rehabilitation Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-13-0001	$4,873,084.00	$3,898,467.20	$974,616.80

Narratives

- **Program Description**

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster-resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. To promote long-term recovery and minimize damage from future disasters, this program may include mitigation measures such as elevation and home hardening.

- **Program Tieback to Disaster/Unmet Needs**

The estimated impact of the tornadoes on homes in eligible areas is over $248,000,000. The housing stock suffered severe damage, impacting both owner-occupied and renter-occupied housing units. This housing program will address the renter-occupied housing needs.

- **How Program will Promote Housing for Vulnerable Populations**

ARRP will serve to increase affordable rental housing options for eligible citizens. All units assisted with CDBG-DR funds will be required to be rented to an LMI household for the duration of the affordability period.

To help reduce 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 tenants.
- Avoiding unjustified impediments by providing guidelines to ensure meaningful 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.

- **Program Affordability Period (if applicable)**

The program affordability period is dependent upon the dollar amount of CDBG-DR funding utilized per housing unit:

Affordability Period per $ amount	Minimum Affordability Period
< than $15,000	5 years
$15,000 - $40,000	10 years
> than $40,000	15 years
New Construction	20 years

- **Program Definition of Second Home/Eligibility**

Second homes will not be eligible for the program.

- **Program National Objective(s)**
  - LMI

- **Program Eligibility**

HUD Identified MID area:

Spalding County

Grantee Identified MID areas:

Butts, Henry, Jasper, Meriwether, Newton, and Troup counties

- **Program Responsible Entity**

Georgia Department of Community Affairs (DCA)

- **Program Maximum Assistance**

$125,000 per unit for rehabilitation with no more than 4 individual rental units per owner. Case-by-case exceptions made as necessary.

- **Program Estimated Begin and End Dates**

May 2026 - May 2029

- **Other Program Details**

- **Program Competitive Application Overview (if applicable)**

N/A

- **Program Method of Distribution Description/Overview (if applicable)**

DCA will administer the program directly with the services of a procured vendor.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

The Mitigation Set-Aside will be used for home hardening and will be defined further in program policies and procedures.

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

Mitigation Set-Asides will be defined further in program policies and procedures.

Projection of Expenditures

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual

Projection of Outcomes

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual

Homeowner Rehabilitation & Reconstruction Program

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-13-0001	$11,826,166.00	$9,460,932.80	$2,365,233.20

Narratives

- **Program Description**

This program is designed to meet housing needs identified in the unmet needs assessment. This program will provide safe, disaster-resistant housing to assist the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. The program consists of rehabilitation, reconstruction, or replacement of existing or destroyed housing units. 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 participation in HRRP, to be awarded on a case-by-case basis.

- **Program Tieback to Disaster/Unmet Needs**

The impact of the tornadoes on homes in eligible areas is estimated to be over $248,000,000. The housing stock suffered severe damage, impacting both owner-occupied and renter-occupied housing units. This housing program will address the needs for owner-occupied housing.

- **How Program will Promote Housing for Vulnerable Populations**

Applications for the Homeowner Rehabilitation and Reconstruction Program (HRRP) will be prioritized according to specific factors:

For the first 45 days of the application period:

- LMI National Objective (household income equal to or less than 80% AMI)

Secondary preference (after initial 45-day application period):

- Urgent Need National Objective (household income greater than 80% AMI but less than 120% AMI) with one or more of the following:
  - Households with special needs or special accommodation requirements (disabled).

All secondary preferences are weighted equally and must not overlap. Either an application is prioritized or it is not.

To help reduce 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.
- Avoiding unjustified impediments by providing guidelines to ensure 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.

- **Program Affordability Period (if applicable)**

Assisted owner-occupied units will agree to a Deferred Payment Loan for a 5-year affordability period. The applicant will agree to maintain ownership and primary residence of the home for a period of 5 years after completing the program. The Deferred Payment Loan will have a progressive forgivability of 20% annually.

- **Program Definition of Second Home/Eligibility**

Second homes will not be eligible for the program.

- **Program National Objective(s)**
    - LMI
    - Urgent Need

- **Program Eligibility**

HUD Identified MID area:

Spalding County

Grantee Identified MID areas:

Butts, Henry, Jasper, Meriwether, Newton, and Troup counties

Other eligibility criteria will be addressed in the program policies and procedures.

- **Program Responsible Entity**

Georgia Department of Community Affairs (DCA)

- **Program Maximum Assistance**

$280,000 with case-by-case exceptions made as necessary.

- **Program Estimated Begin and End Dates**

July 2025 - June 2028

- **Other Program Details**

- **Program Competitive Application Overview (if applicable)**

N/A

- **Program Method of Distribution Description/Overview (if applicable)**

DCA will administer the program directly with the services of a procured vendor.

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

The Mitigation Set-Aside will be used for home hardening and will be defined further in program policies and procedures.

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

Mitigation Set-Asides will be defined further in program policies and procedures.

Projection of Expenditures

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual

Projection of Outcomes

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual

Buyout Program(s)

No Grantee Program(s)

Infrastructure Program(s)

No Grantee Program(s)

Economic Revitalization Program(s)

No Grantee Program(s)

Public Facilities Program(s)

No Grantee Program(s)

Public Services Program(s)

Public Services – Title Related Legal Assistance

Grant Type	Grant Number	Proposed Budget	Proposed HUD-Identified MID Budget	Proposed Grantee-Identified MID Budget
Parent	B-23-DG-13-0001	$750,000	$600,000	$150,000

Narratives

- **Program Description**

DCA hopes to leverage the broad network of community service and nonprofit organizations with well-established ties to the communities to help remove obstacles to applicant participation. DCA will enter into subrecipient agreements with a qualified non-profit agency to provide legal services to individual applicants for HRRP and ARRP. Title searches for all properties will be ordered, and the non-profit agency will provide title remediation services to those who require them to participate in the housing programs.

- **Program Tieback to Disaster/Unmet Needs**

Heirs property, a home or land with no clear title holder, is an unstable form of ownership that prevents storm victims from accessing disaster relief assistance and thwarts the efforts of municipalities to revitalize neighborhoods.

- **Program National Objective(s)**
    - LMI
    - Urgent Need

- **Program Eligibility**

All applicants in the Homeowner Rehabilitation and Reconstruction Program (HRRP) and the Affordable Rental Rehabilitation Program (ARRP) will be eligible for services.

- **Program Responsible Entity**

Georgia Heirs Property Law Center, through a subrecipient agreement with DCA.

- **Program Maximum Assistance**

N/A

- **Program Estimated Begin and End Dates**

January 2025 – January 2027

- **Other Program Details**

- **Program Competitive Application Overview (if applicable)**

N/A

- **Program Method of Distribution Description/Overview (if applicable)**

N/A

- **How Mitigation Set-Aside Activities will Meet Definition of Mitigation? (If Applicable)**

N/A

- **How Mitigation Set-Aside Activities will Address Current & Future Risks? (If Applicable)**

N/A

Projection of Expenditures

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual

Projection of Outcomes

Grant Number	Period	Quarterly Projection	Quarterly Actual	Cumulative Projection	Cumulative Actual

Mitigation Program(s)

No Grantee Program(s)

5. Appendix

a. Certifications.

As outlined in the updated Universal Notice and as amended, DCA is making the following certifications with this Action Plan, in addition to the certifications at 24 CFR 91.225 and 91.325, as applicable.

a. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan - DCA certifies that it:
   (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements;
   (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

b. Authority of Grantee: DCA certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that DCA, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

c. Consistency with the Action Plan - DCA certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

d. Citizen Participation -DCA certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from DCA must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

e. Consultation with Local Governments - DCA certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any

local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.

f. Use of Funds - DCA certifies that it is complying with each of the following criteria:
   (1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing,economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).
   (2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
   (3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
   (4) Special Assessment. DCA will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, DCA certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

g. Grant Timeliness - DCA certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

h. Order of Assistance - DCA certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

b. Summary and Response of Public Comments.

Original Action Plan Submission

The following provides a summary of public comments received for the State of Georgia CDBG-Disaster Recovery Action Plan in response to Disaster-4685 during the public comment period of April 15, 2024, through May 16, 2024. DCA received a total of 5 comments during the 30 calendar days.

The comments received during the public comment period, as well as the additional comments received during the public hearings, did not require any updates to the draft Action Plan.

Substantial Amendment #1:

The following provides a summary of public comments received for the State of Georgia CDBG-Disaster Recovery Action Plan in response to Disaster-4685 during the public comment period of December 05, 2025, through January 05, 2026. DCA received a total of X comments during the 30 calendar days.

The comments received during the public comment period, as well as the additional comments received during the public hearings, did not require any updates to the draft Action Plan.

c. Data Sources/Methodologies.

Data Sources:

- CDC/AYSDR Social Vulnerability Index Interactive Map 2020 Database
- City of Griffin, Georgia – Planning and Development Department & Housing Authority
- Federal Emergency Management Agency (FEMA) – Open FEMA Data Sets
- Georgia Balance of State Continuum of Care
- Georgia Department of Community Affairs – Housing Finance and Development Division
- Georgia Emergency Management and Homeland Security Agency (GEMA/HS)
- Georgia Housing Needs Assessment 2023
- Georgia Statewide Point in Time Homeless Count 2022
- Georgia's Hazard Mitigation Strategy Plan
- HUD Exchange – Fair Housing
- National Alliance to End Homelessness – 2022 HIC Counts
- National Centers for Environmental Information: National Oceanic and Atmospheric Administration – January 2023 Tornadoes Report
- National Weather Service: National Oceanic and Atmospheric Administration – January 12, 2023, Tornado Outbreak
- Small Business Administration (SBA) – Disaster Loan Statistics
- Spalding County, Georgia – Administration, Emergency Management, & Fire Departments
- S. Census Bureau American Community Survey (ACS) 5-Year dataset 2018-2022
- S. Census Bureau, County Business Patterns
- S. Department of Housing and Urban Development (HUD)
- U.S. Bureau of Labor Statistics

Methodologies are outlined throughout the document, where applicable.

d. Important Definitions and Terms.

Acronyms	Definition
ABFE	Advisory Base Flood Elevation
ACS	American Community Survey
AMI	Area Median Income
ARRP	Affordable Rental Rehabilitation Program
CBP	County Business Patterns
CDBG-DR	Community Development Block Grant Disaster Recovery
CDC/ATSDR SVI	Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry Social Vulnerability Index
DCA	(Georgia) Department of Community Affairs
DOB	Duplication of Benefits
DRRP	Disaster Recovery and Redevelopment Plans
EIDL	(SBA) Economic Injury Disaster Loan
FEMA	Federal Emergency Management Agency
FEMP	Federal Emergency Management Program
FVL	FEMA Verified Loss
GEMA/HS	Georgia Emergency Management and Homeland Security Agency
GHMS	Georgia Hazard Mitigation Strategy
GHPLC	Georgia Heirs Property Law Center
HA	(FEMA) Housing Assistance
HCDA	Housing and Community Development Action of 1974, as amended
HIRA	Hazard Identification and Risk Assessment
HRRP	Homeowner Rehabilitation and Reconstruction Program
HUD	U.S. Department of Housing and Urban Development
IA	(FEMA) Individual Assistance
IHP	(FEMA) Individual and Household Program
LMI	Low-to-Moderate Income
MID	Most Impacted and Distressed
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NOAA	National Oceanic and Atmospheric Administration
ONA	(FEMA) Other Needs Assistance
PA	(FEMA) Public Assistance
PHA	Public Housing Authority
PRCS	Puerto Rico Community Survey
R/ECAP	Racially and Ethnically Concentrated Areas of Poverty
RL	Repetitive Loss
SBA	Small Business Administration
SRL	Severe Repetitive Loss
URA	Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended
VOAD	Voluntary Organizations Active in Disaster
VOB	Verification of Benefits

e. Standard Form 424.

OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☐ New	
☐ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
Completed by Grants.gov upon submission.	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. UEI:

d. Address:

* Street1:	
Street2:	
* City:	
County/Parish:	
* State:	
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	

e. Organizational Unit:

Department Name:	Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:		* First Name:	
Middle Name:			
* Last Name:			
Suffix:			

Title:	
Organizational Affiliation:	
* Telephone Number:	Fax Number:
* Email:	