



# City of Columbia, South Carolina

Community Development Block Grant – Disaster Recovery

**Action Plan**  
December 21, 2016

**For CDBG-DR Funds  
Disaster Relief Appropriations Act of 2016  
(Public Law 114-3, Effective: June 22, 2016)**

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## CDBG-DR Action Plan List of Acronyms

ABFE	Advisory Base Flood Elevation
ACS	American Community Survey
ADA	Americans with Disabilities Act
AMI	Area Median Income
AIAN	American Indian/Alaskan Native
BFE	Base Flood Elevation
CBP	Columbia Buyout Program
CDBG-DR	Community Development Block Grant-Disaster Recovery
CHA	Columbia Housing Authority
CHAP	Columbia Homeowner Assistance Program
CHDO	Community Housing Development Organization
CPAC	Climate Protection Action Committee
DOB	Duplication of Benefits
DOA	Department of Agriculture
DRGR	Disaster Recovery Grant Reporting
EGCC	Enterprise Green Committee Criteria
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FEMA IA	FEMA Individual Assistance
FEMA IHP	FEMA Individual and Households Program
FEMA PA	FEMA Public Assistance
FIRM	Flood Insurance Rate Map
HERS	Home Energy Rating System
HMGP	Hazard Mitigation Grant Program
HMIS	Homeless Management Information System
HOME	Home Partnership Program
HOPWA	Housing Opportunities for Persons with Aids
HUD	Housing and Urban Development (Department of)
ICC	Increased Cost of Compliance
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LMI	Low/Moderate Income
MACH	Midlands Area Consortium for the Homeless
MBE/WBE	Minority Owned Business Enterprise/Women Owned Business Enterprise
MFRG	Midlands Flood Recovery Group
MGD	Million Gallons/Day
MRP	Minor Repair Program
MSA	Metropolitan Statistical Area
NFIP	National Flood Insurance Program
NHPI	Native Hawaiian/Pacific Islander
OIG	Office of Inspector General
PA	Programmatic Agreement
PEAR	Property Enhancement Assistance for Rental Housing
PHA	Public Housing Authority
PP FVL	Personal Property FEMA Verified Loss
QA/QC	Quality Assurance/Quality Control

QPR	Quarterly Progress Report
RP FVL	Real Property FEMA Verified Loss
SBA	Small Business Administration
SBDR	Small Business Disaster Recovery
SCDNR	South Carolina Department of Natural Resources
SCEMD	South Carolina Emergency Management Department
SFHA	Special Flood Hazard Area
SNAP	Supplemental Nutrition Assistance Program
SRRP	Small Rental Repair Program
URA	Uniform Relocation Assistance and Real Property Acquisition Policies Act
USACE	U.S. Army Corps of Engineers

## 1.0 Executive Summary

The purpose of this Action Plan is to describe how the City of Columbia, SC will comply with all applicable rules and regulations in administration of the Community Development Block Grant – Disaster Recovery (CDBG-DR) funding granted to the City by the Department of Housing and Urban Development (HUD). It is important to note that in developing this Action Plan the City of Columbia faced a significant challenge because the most severe damage was sustained by non-LMI households. Despite that challenge this Action Plan ensures that all funds will be managed to meet one or more of three national objectives:

- Benefit to Low-to-Moderate Income (LMI) Households
- Urgent Need
- Elimination of Slums and Blight

In addition to meeting these required objectives, the City of Columbia also aspires to promote economic development in under-developed areas, improve quality of life for all its citizens, and strengthen its communities through judicious management of federal government funding.

Specifically, the City of Columbia proposes the following allocation strategy of CDBG-DR and CDBG Program Income funds to achieve the above objectives:

Program	Allocation	Percentage of Funding	Impacted Properties
Administration	\$999,450	4.8%	
Planning & Project Delivery	\$999,450	4.8%	
Homeowner Assistance Program (LMI)	\$3,336,150	15.9%	76
Homeowner Buyout Program (LMI/Urgent Need)	\$2,000,000	9.5%	42
Small Rental Repair Program (LMI)	\$6,565,270	31.3%	193
Elevation Reimbursement Program (LMI/Urgent Need)	\$3,490,000	16.6%	22
Minor Repair Program (LMI)	\$2,398,680	11.4%	1,198
CDBG Program Income Funds/Minor Repair (LMI)*	\$1,000,000	4.8%	
Economic Development (Urgent Need)	\$200,000	1.0%	
<b>Total</b>	<b>\$20,989,000</b>	<b>100.0%</b>	<b>1,531</b>

\*City of Columbia CDBG Program Income Funds in addition to \$19,989,000 in CDBG-DR funding allocated by HUD.

This allocation meets the national objectives above by ensuring assistance to all LMI households with Major or Severe Damage. It also aligns with HUD's objectives that 70% of the funding meets the LMI benefit requirements, and maximizes the number of LMI households benefitting from the program. It also assists the City of Columbia in providing safe, disaster-resilient housing critical to the City's long-term recovery strategy.



## 2.0 Introduction and Disaster Impact Overview

In October 2015, the City of Columbia, along with much of the State of South Carolina, experienced unprecedented and historical rainfall and flooding resulting from an upper atmospheric low-pressure system that funneled tropical moisture from Hurricane Joaquin. This heavy and extended rainfall exceeded a once in a thousand-year flood event with more than two feet of rainfall in less than 48 hours. The rain and flooding caused extensive damage to many dams, bridges, roads, homes, and businesses in the state's capitol. As a result, approximately 400 homes and 60 businesses received rain and/or flood damage at an estimated value of \$65 million. In addition, the city sustained more than \$75 million in infrastructure losses. Most of the major and severe damages to housing occurred along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch areas of the city. Numerous City of Columbia residents, including many of low-to-moderate income households, were forced to abandon their homes, and many houses were isolated as more than 100 streets were closed, blocked, or impassable. In addition to the damage to private residences and businesses, the city also experienced the total loss of one fire station and training facility.

The flooding also impacted the city's utilities, wastewater treatment systems, and drinking water treatment and collection systems. Due to the fact that the ground surfaces were already saturated from rainfall in September, there were multiple dam failures in the city and a massive breach in the Columbia Canal. Flooding caused a 60-foot section of the Columbia Canal to wash away and caused the water level to drop below the level necessary for the city to pump water into its water treatment facility through normal operations. Additionally, waste water stations were completely submerged and multiple sewer and water lines were ruptured or broken. The canal breach combined with numerous line breaks throughout the water system led to a 10-day disruption of clean drinking water for more than 375,000 citizens who received boil water notices. The flooding and disruption of drinking water severely impacted the operations of the following:

- City Capitol Complex
- Governor's residential compound
- State Agencies
- City Government Agencies
- 5 colleges and 1 major university (40,000 students and 2,000 faculty)
- 5 Hospitals with 2,436 beds (including a Level 1 Trauma Center)
- US military installation -Fort Jackson (3,500 active duty members and 12,000 family members)
- All public, private, and parochial school districts
- Nursing homes and assisted care facilities
- Numerous Banking Institutions, Restaurants, Hotels, Tourist Destinations, and hundreds of other businesses and organizations

This widespread damage to homes, businesses, and critical infrastructure exacted a human toll and disrupting the lives of the citizens of impacted communities in Columbia and across South Carolina who are still recovering.

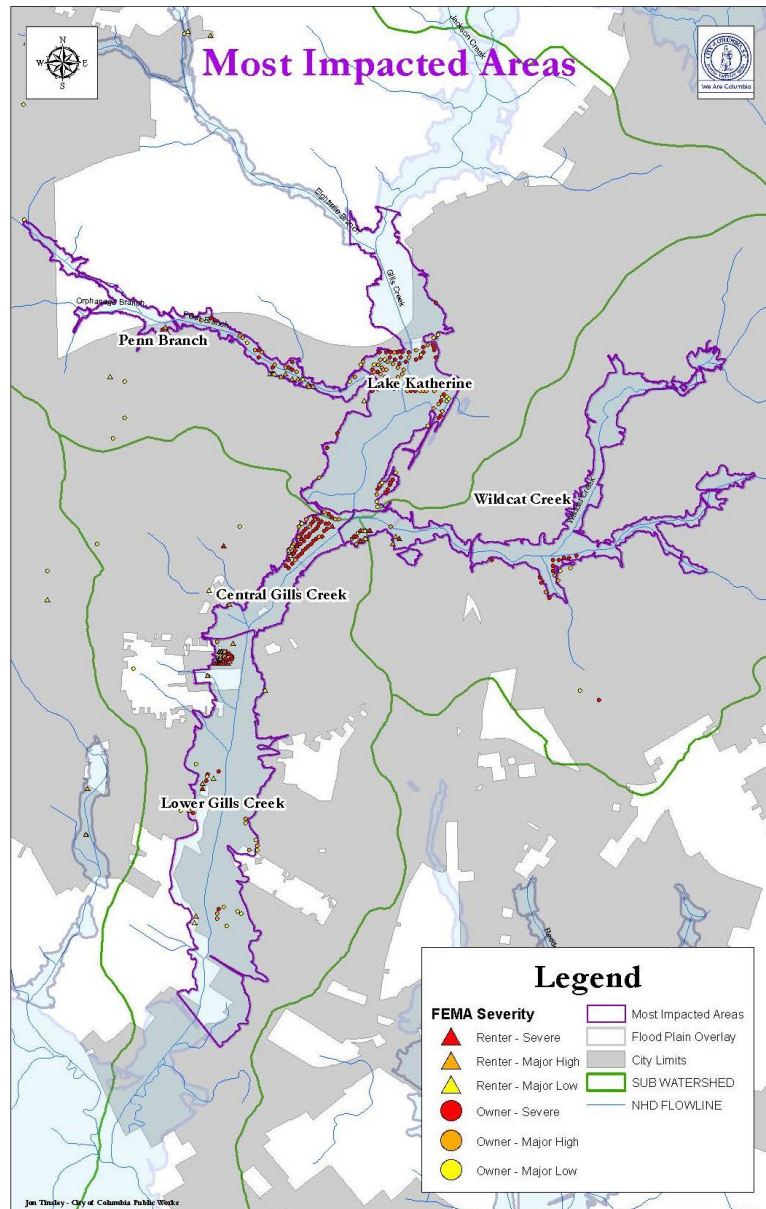
In Columbia, homes along and near the City's many creeks, lakes, and other waterways were

inundated by floodwater causing almost complete destruction of some neighborhoods. Local businesses lost inventory and operations were halted leading to loss of income and wages. Exacerbating the overall economic loss was the decision to relocate the site of a previously scheduled major college football contest from Columbia's University of South Carolina stadium to the opposing team's stadium. As a result, businesses that were not otherwise impacted by the storm's waters experienced tremendous economic loss.

The federal disaster declaration brought necessary resources from the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) to aid in response and recovery. Due to the scale of the damage, FEMA and SBA's resources, as well as private insurance, have proven insufficient to address all of the losses incurred from the disaster.

HUD's allocation of \$19.989 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the City of Columbia will help the city address some of the direst unmet needs. To illustrate the city's plans for implementation of programs to meet these needs, the City of Columbia has developed the following Action Plan. The plan outlines the proposed use of funds and eligible activities available to assist residents and local businesses to recover from the October 2015 flood event.

Supplemental to the CDBG-DR Action Plan, the City of Columbia submitted all *Risk Analysis Documentation* to include the *City of Columbia CDBG-DR Pre-Award Implementation Plan* in compliance with PL. 114-113 in order to demonstrate sufficient capacity to effectively manage and provide oversight of CDBG-DR funding. Two hard copies and one digital copy of this documentation accompanied with all applicable certifications was submitted to HUD on July 22, 2016 as amended on December 21, 2016.





## 2.1 Regulatory Guidance

The Disaster Relief Appropriations Act of 2016 (Pub. L. 114-113, approved December 18, 2015) (Appropriations Act) was enacted to appropriate federal funds for disaster relief. The Act provides monies to states or units of general local government (UGLGs) for disaster recovery efforts in the most affected areas. As such, the federal government appropriated \$300 million in CDBG-DR funds to be made available to the various states that were declared a major disaster by the President of the United States in 2015. These funds are to be used to satisfy a portion of unmet need that still remains after other federal assistance, such as FEMA, SBA, or private insurance, has been allocated.

The Department of Housing and Urban Development (HUD) uses the “best available” data to identify and calculate unmet needs for disaster relief, long-term recovery, restoration of infrastructure, and housing and economic revitalization. Based on this assessment, HUD allocated \$96,827,000 in disaster recovery funds to the State of South Carolina to assist in recovery from the floods. The City of Columbia was provided a separate allocation of \$19,989,000, to address its unmet recovery needs. Supplemental to CDBG-DR funds, the city has also set aside \$1 million CDBG Program Income funds to augment recovery activities for low to moderate income households.

The Disaster Relief Appropriations Act requires that the state or local government must expend the funds within six years of the signed agreement between HUD and the grantee unless an extension is granted by HUD. All of the allocated funds must be used for eligible disaster-related activities with 70% of all CDBG-DR funding programmed to benefit low-to-moderate income households. To meet all federal requirements, the City of Columbia Community Development Department has been designated as the responsible entity for administering the CDBG-DR funds allocated directly to the city.

As such, the City of Columbia Community Development Department will ensure that all CDBG-DR funds meet one of three national objectives: 1) benefit to low-to moderate income households, 2) elimination or prevention of slums and blight, and 3) urgent need. This Action Plan assesses unmet needs in the areas of housing, infrastructure, and economic development. The plan also outlines the city’s allocation strategy to effectively address outstanding recovery needs, proposed use of funds, eligibility criteria, and methods to address long-term recovery. The allocation strategy for the city was developed using information from the following sources:

- Federal Emergency Management Agency (FEMA) Individual Assistance (IA) Program
- FEMA Public Assistance Program (PA)
- Small Business Administration (SBA)
- National Flood Insurance Program (NFIP)
- Columbia Housing Authority (CHA)
- City of Columbia Building Department
- City of Columbia GIS Department and Planning Departments
- City of Columbia Consolidated Plan
- City of Columbia Comprehensive Plan
- City of Columbia Building Permits
- City of Columbia Office of Business Opportunity (OBO)

- South Carolina Emergency Management Department (SCEMD)
- Engineering estimates for FEMA PA Projects
- United States 2010 Decennial Census
- 2014 American Community Survey (ACS)
- Public and stakeholder outreach and feedback

In conjunction with this information, the city analyzed and developed criteria to guide the decision-making process with these overall goals in mind:

- Serve all LMI households with Major or Severe Damage
- Ensure that 70% of CDBG-DR funding would be allocated to meet the Low-to-Moderate Income Benefit requirements
- Maximize the number of LMI households benefitting from CDBG-DR programs

The City's analysis was populated by FEMA damage assessments, income of potential applicants categorized as LMI using HUD 2016 income limits, projected average amounts of unmet need assuming program caps for non-LMI households (as incorporated into the design for each of the programs), and average re-building costs in the City of Columbia.

The following chart summarizes the results of the analysis used to develop the City's CDBG-DR allocation strategy to address unmet recovery needs identified in the community.

Program	Allocation	Percentage of Funding	Impacted Properties
Administration	\$999,450	4.8%	
Planning & Project Delivery	\$999,450	4.8%	
Homeowner Assistance Program (LMI)	\$3,336,150	15.9%	76
Homeowner Buyout Program (LMI/Urgent Need)	\$2,000,000	9.5%	42
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<b>Total</b>	<b>\$20,989,000</b>	<b>100.0%</b>	<b>1,531</b>

\*City of Columbia CDBG Program Income Funds in addition to \$19,989,000 in CDBG-DR funding allocated by HUD.

### 3.0 Community Baseline Data

#### 3.1 Demographic Profile of Impacted Areas

The demographic profile of the City of Columbia presented below summarizes key characteristics of the population including potential risk factors and vulnerabilities. During recovery planning, it is important to understand the underlying characteristics of the population in the impacted areas to ensure that recovery programs are responding to the unique conditions of the community and the residents in need of assistance. Due to the widespread flooding, residents of all demographics and income levels in the City were impacted. To reflect this, the profile includes information for the entire City of Columbia.

##### 3.1.1 Total Population and Age

According to the 2010 U.S. Census, the City of Columbia had a total population of 129,272 residing in 45,666 households with an average household size of 2.18. The median age of City of Columbia residents in 2010 was 28.1 with 17% of the population under the age of 18 and 8.7% over the age of 65. These figures indicate that City of Columbia residents are generally younger than the State as a whole which, as of 2010, had a median age of 37.9 and a smaller percentage of residents over the age of 65 (Table 1).

**Table 1: 2010 US Census City of Columbia Population**

Municipality	Total	Pop 65+	% Pop 65+	Pop <18	% Pop <18	Median Age
City of Columbia	129,272	11,250	8.7%	21,914	17.0%	28.1
State of South Carolina	4,625,364	631,874	13.7%	1,080,474	23.4%	37.9

*Source: 2010 US Census*

##### 3.1.2 Race, Ethnicity, and Language

The 2010 U.S. Census also indicates the City's population is predominantly white (51.7%) and Black or African American (42.2%). Other races include Asian (2.2%), American Indian and Alaskan Native (0.3%), Native Hawaiian and Other Pacific Islander (0.1%), some other race (1.5%), and two or more races (2.0%). Columbia is also home to 5,622 Hispanic or Latino residents who account for approximately 4.3% of the population. As evidenced by Table 2, the racial composition of the City differs from the State as a whole, with the largest difference being the larger percentage of Black or African American residents in the City than in the State.

**Table 2: 2010 US Census City of Columbia Ethnicity**

Ethnicity	City of Columbia		State of South Carolina	
	Pop.	%	Pop.	%
Hispanic or Latino	5,622	4.30%	235,682	5.1%
White	66,777	51.70%	3,060,000	66.2%
African American	54,537	42.2%	1,290,684	27.9%
American Indian & Alaska Native	434	0.3%	19,524	0.4%
Asian	2,879	2.2%	59,051	1.30%
Native Hawaiian & Other Pacific Islander	164	0.1%	2,706	0.1%
Other Race	1,922	1.5%	113,464	2.5%
Two or More Races	2,559	2.0%	79,935	1.7%

Source: 2010 US Census

According to the US Census American Community Survey (ACS), 92.3% of the City of Columbia's population speaks only English and 7.7% speak a primary language other than English. The most prevalent language other than English is Spanish, which is spoken by 4.1% of the population (5,039 residents). The ACS estimates that 14.6% percent of the residents that speak other languages speak English "less than very well."

Due to the diverse nature of the City of Columbia, planning and recovery decisions may affect racial, ethnic and low income concentrations. For this reason, the city has incorporated ways to increase and provide the availability of affordable housing in low-poverty, non-minority areas where appropriate and in response to natural hazard-related impacts. The overall strategy used to inform the city's housing recovery efforts can be found in the *2015-2019 Consolidated Plan, NA-15 Disproportionately Greater Need: Housing Problems*, which evaluates the existence of housing problems, severe housing conditions, and severe cost burden among racial and ethnic groups and compares that against citywide data to ascertain if any groups share a disproportionate burden of the area's housing problems. Housing problems are defined as households meeting at least one of the following conditions:

- Lacks complete kitchen
- Lacks complete plumbing facilities
- More than one person per room
- Cost burden is greater than 30%

Households with severe conditions experience one or more of the above and severe overcrowding (more than 1.5 persons per room) and/or a cost burden greater than 50%.

A disproportionate need exists when persons of a particular racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole. It is important to note that these populations are small compared to the overall Columbia population, ranging from 100 to 200 people per race or ethnic group in each income cohort. Nonetheless, the fact that a disproportionate number of these groups experience housing problems is an issue that the City of Columbia will continue to address in its regular CDBG and Disaster Recovery programs.

The 2016 Area Median Income for the City of Columbia is \$64,100, thus the Extremely Low Income range (0-30%) is \$0 - \$19,230, the Very Low Income range (30-50%) is \$19,231 - \$32,050, and the Low Income range (50-80%) is \$32,051 - \$51,280.

Asians and Hispanics in the Extremely Low and Very Low Income categories experienced a disproportionately greater need in terms of housing problems. Hispanics in the Low Income level also experienced such a need. Whites, Asians and Hispanics in the Extremely Low cohort experienced a disproportionately greater need; as did Hispanics in the Very Low Income range. Only American Indians or Alaska Natives and Hispanics experienced a disproportionately greater need in instances of cost burden or severe cost burden, experiencing severe cost burden at a rate much higher than the rest of the community, 32% and 28% respectively.

Citywide, 83% of Extremely Low Income persons experienced at least one of the four housing problems; 97% of both Asians and Hispanics in this income category experienced at least one housing problem, 14% higher than the jurisdictional rate. Seventy percent of persons at this income level citywide experience housing problems at a severe level, compared to 81% of Whites, 97% of Asians, and 91% Hispanics, all more than 10% higher than the jurisdictional rate.

Seventy-one percent (71%) of Very Low Income persons experienced at least one of the four housing problems; 83% of Asians and 96% Hispanics in this income category experienced at least one housing problem; 12% and 25% higher respectively than the citywide rate. Citywide, 32% at this income level experience severe housing problems compared to 50% Hispanics, a rate 18% higher.

Forty-three percent (43%) of Low Income persons experience at least one housing problem; as did 59% Hispanics in this income category; 16% higher than the citywide rate.

### **3.1.3 Education**

At the time of the 2014 ACS, an estimated 86.4% of the City of Columbia residents had graduated from high school or had a higher level of education and training, and 9.4% had completed a bachelor's degree or higher level of education and training.

### **3.1.4 Vulnerable and Special Needs Populations**

When conducting recovery efforts, it is essential to accurately identify potentially vulnerable populations in the study area. These populations can face unique challenges and have more difficulty responding to disaster events than the general population due to



physical and financial capabilities, health concerns, and location and quality of their housing, among other factors. For the purposes of this planning process, vulnerable populations include children; elderly; low-income; the physically, developmentally, or mentally disabled; the homeless; and the medically dependent. An analysis of each of these groups follows.

#### **3.1.4.1 Children and Elderly**

Households with children or elderly residents may experience additional vulnerabilities during disasters and subsequent recovery efforts. Limited mobility, required medicine, physical ailments, or fragility increase the safety risks for these individuals and their family members in emergency situations. Ensuring that these households have access to information, resources, and quality housing stock is a priority for the City of Columbia's long-term public safety and community resilience efforts.

As of 2014, 11,596 households (25.4%) in the City had at least one child, and 8,521 households (18.7%) included at least one person age 65 or older. In addition, 4,046 households (8.9%) were comprised of people 65 years or older living alone, which creates even greater vulnerability.

#### **3.1.4.2 Economic Hardship**

Financial hardships can have far-reaching implications for residents, and especially for young families and the younger workforce. A household that experiences financial difficulties may find it challenging or impossible to make necessary repairs or investments that can increase safety and resilience. According to the 2014 ACS, the median household income in the City was \$41,454. A total of 17.4% of the population were considered below the poverty line in 2014; 4.2% received Supplemental Security Income; 1.6% received cash public assistance; and 16.4% received Food Stamps and Supplemental Nutrition Assistance Program (SNAP) benefits.

HUD considers families that pay more than 30% of their income for housing to be cost burdened, and as a result, likely to experience significant economic hardship. These individuals are likely to have amplified recovery needs due to a lack of resources to invest in improvements that increase preparedness, protect property, and aid recovery. Among current homeowners with a mortgage in the City of Columbia, the 2014 ACS reports that 24.3% spend more than 30% of their income on monthly housing costs. Among renters, 50.3% spend more than 30% of their income on monthly housing costs, which indicates a significant number of people experiencing serious economic hardship. The *City of Columbia 2015-2019 CDBG Consolidated Plan* reported that 17% of all households in the city experienced severe cost burdens meaning that these households are paying more than 50% of their income on housing costs.

#### **3.1.4.3 Residents with Disabilities or Health Concerns**

Residents with disabilities or mental disorders may have increased vulnerabilities during times of disaster and subsequent recovery efforts. The nature and extent of the disabilities in the City vary greatly, making a full understanding of the needs of this population very difficult to determine. However, it is imperative to identify and address the potential recovery needs of the current population with disabilities.

According to the 2015 ACS survey, 11,907 civilians (10.5% of the population) have a disability in the City of Columbia. Of these individuals, 533 are children and 3,225 are over the age of 65. Children and elderly with disabilities are most vulnerable and must be included in the planning and implementation of disaster recovery and resiliency initiatives. The *City of Columbia 2015-2019 CDBG Consolidated Plan* reports that 42.9% of the disabled population aged 16 and over were in the workforce, with 19.3% unemployed. In addition, 28.9% of the disabled are living below the poverty level (source: *American Community Survey 2013*).

#### **3.1.4.4 Homeless**

The City of Columbia faces significant problems associated with homelessness and prevention of homelessness. The homeless population in the area continues to increase due in part to ongoing high unemployment, the continuing effects of the recent recession, and the exacerbating impacts of the recent disaster. The homeless population encompasses a broad range of individuals and families with special needs.

The City of Columbia Consolidated Plan HMIS data indicates 5,879 homeless people were served in the 14-county Midlands Area Consortium for the Homeless (MACH) in 2014. Of this number, there were:

- 913 chronically homeless
- 744 veterans
- 285 families with children
- 57 families with a chronically homeless head of household
- 33 families with a veteran head of household
- 4 unaccompanied youth

The analysis also concluded that African Americans make up almost 66% of the homeless population in Columbia, while this race only represents 42.3% of the general population in the city (source: *2009-2013 ACS*). In 2014, MACH counted 426 unsheltered people on January 23, compared to 1,162 people staying in emergency shelters and transitional housing that night.

## 3.2 City of Columbia Housing

The following paragraphs assess the city's current housing stock as well as public housing, permanent supportive housing, and housing for the homeless.

### 3.2.1 Existing Housing Stock

The 2014 ACS reported a total of 52,539 housing units in the City of Columbia, of which 85.6% were occupied, resulting in a vacancy rate of 14.4%. Of these units, 20,643 (45.9%) were owner-occupied and 24,349 (54.1%) were renter-occupied.

The majority of housing units in the City are 1-unit detached structures (53.6%), with the remainder divided between multi-family structures (42.2%), mobile homes (0.9%), and 1-unit attached structures (3.4%). The median value of homes in the City of Columbia was estimated to be \$159,600 in 2014. Table 3 provides a breakdown of housing types for the City of Columbia compared to the State of South Carolina.

**Table 3: City of Columbia Housing Types**

Housing Type	City of Columbia		South Carolina	
	Units	Percent	Units	Percent
1-unit, detached	28,175	53.6%	1,362,445	62.3%
1 unit, attached	1,769	3.4%	68,995	3.2%
2 units	3,348	6.4%	53,590	2.4%
3 to 4 units	3,293	6.3%	64,136	2.9%
5 to 9 units	4,019	7.6%	98,041	4.5%
10 to 19 units	3,450	6.6%	77,295	3.5%
20 or more units	8,023	15.3%	100,088	4.6%
Mobile Home	462	0.9%	362,634	16.6%
Boat, RV, Van	0	0%	1,034	0%
<b>Total</b>	<b>52,539</b>	<b>100%</b>	<b>2,188,258</b>	<b>100%</b>

Source: 2014 ACS

Compared to the State of South Carolina, the housing stock in the City of Columbia is aging with the majority of homes (50.7%) built before 1970. The decade of largest housing construction occurred between 2000 and 2009, with 8,231 units making up 15.7% of the City's housing stock. Table 4 provides a summary of housing stock age in City of Columbia compared to the State of South Carolina.

**Table 4: City of Columbia Housing Age**

Year	City of Columbia		South Carolina	
	Units	Percent	Units	Percent
Built 2010 or later	936	1.8%	62,099	2.8%
Built 2000 - 2009	8,231	15.7%	446,564	20.4%
Built 1990 - 1999	5,560	10.6%	427,477	19.5%
Built 1980 - 1989	5,384	10.2%	377,469	17.2%
Built 1970 – 1979	5,797	11.0%	346,117	15.8%
Built 1960 – 1969	7,392	14.1%	209,394	9.6%
Built 1950 - 1959	7,846	14.9%	152,937	7.0%
Built 1940 – 1949	4,918	9.4%	69,546	3.2%
Built 1939 or earlier	6,475	12.3%	96,655	4.4%
<b>Total</b>	<b>52,539</b>	<b>100%</b>	<b>2,188,258</b>	<b>100%</b>

Source: 2014 ACS

Between 2000 and 2013, Columbia's population grew 13% from 116,278 to 131,004, with the number of households increasing from 41,960 to 45,112 according to the U. S. Census Bureau's 2013 American Community Survey (ACS). While median household income also increased during the same period (by 33% to \$41,344), housing costs outpaced the rise in income, severely limiting affordable, livable units close to employment centers and public facilities and services. According to the *City of Columbia 2015-2019 Consolidated Plan*, the most pressing housing problems today are:

- Substandard housing – units lacking complete plumbing or kitchen facilities
- Severely overcrowded – units with more than 1.51 people per room
- Overcrowded – units with 1 – 1.5 people per room
- Housing costs more than 30% of income

Cost burden is the biggest housing problem in Columbia in terms of sheer numbers, a common trend in many communities across the state. More than 16,000 households or 35% are financially stretched due to housing costs. Accordingly, 11,069 renters and 3860 homeowners are paying more than 30% of their income for housing costs. In addition, 7139 Low-to-Moderate Income (LMI) households experience one or more housing problem, with the lower the income the greater the presence of one of the housing problems identified above.

Low income households experience more housing problems across the board. Data from the City of Columbia Consolidated Plan indicates:

- 15 homeowners lack complete plumbing or kitchen facilities; all are extremely low (0-30% AMI) income

- 464 renters (419 LMI) live in housing without plumbing or a kitchen
- 79 owners (75 LMI) and 275 renters (210 LMI) experience overcrowding
- 300 renters (215 LMI) experience severely overcrowded conditions
- 2,075 owners (1,890 LMI) and 6,105 (all LMI) share a cost burden > than 50% of income
- 1,785 owners (1,350 LMI) and 4,964 (435 LMI) share a cost burden > than 30% of income
- 230 owners and 850 renters (all LMI) have a zero/negative income

### 3.2.2 Supportive Housing

Supportive housing has proven to be an overwhelmingly successful answer to homelessness because it is a cost-effective, community-friendly alternative to shelters, hospitals, and emergency care and it enables individuals to remain housed while achieving greater levels of self-sufficiency. By definition, supportive housing is permanent, affordable rental housing linked to services (health, mental health, employment) that help individuals rebuild their lives after homelessness, institutional care, financial distress, or other disruptions.

The Columbia Housing Authority (CHA) provides 2,200 units of safe, affordable rental housing to 15,000 low and moderate income (LMI) families, the elderly and persons with disabilities. Through its Section 8 Rental Assistance Program, CHA also administers approximately 3,100 housing vouchers and moderate rehabilitation certificates. Section 8 participants pay 30% of their adjusted gross income for rent and utilities; the Housing Authority Assistance Payments Program subsidizes the balance of rent for the property owner.

The need for affordable housing has never been greater. Currently, affordable housing and voucher waiting lists are closed, leaving 29,000 Columbia applicants without assistance. Expensive housing unduly burdens LMI households, pushing many into unsustainable housing situations, particularly LMI individuals and families with children who are currently housed, but at risk of residing in shelters or becoming homeless. The City participates in the Greater Columbia Community Relations Council to identify and address fair housing issues and meets quarterly with CHA and the United Way of Midlands to review ordinances and regulations that may pose a barrier to affordable housing and address development issues.

One of the City of Columbia's highest priorities is to prevent low-income individuals and families with children from becoming homeless. Local government agencies and nonprofit groups are assisting the most vulnerable clients – the elderly and those with extreme disabilities or extreme poverty – in obtaining housing and keeping them housed. Those populations deemed at highest risk of becoming homeless are:

- Very low income population
- Elderly
- Recently released ex-prisoners
- Deinstitutionalized mentally disabled persons



- Victims of family violence

The City is committed to helping the homeless - and those at risk of becoming homeless - shift to permanent housing. As a result of the 2015 Flood, financial difficulties caused by loss of job, illness, disability, or a family emergency, has dramatically increased the inability to pay rent. Our strategy to address at-risk individuals takes into account the primary role of community-based charitable organizations and volunteer programs (VOADs), alone or in partnership with local governments and public agencies, in establishing and supporting basic facilities and services for vulnerable and special needs individuals.

Since the October 2015 storm, the City has collaborated with the Midlands Flood Recovery Group (MFRG), an affiliate of United Way of the Midlands (UWM), to assist low-to-moderate income households in repairing housing damages or rebuilding homes devastated by the flood. UWM also loans mold remediation equipment and provides mold remediation supplies to nonprofit groups repairing homes in Lexington and Richland Counties, including the City of Columbia. It helps homeowners access rebuilding sponsors, volunteer labor and hosts through its Restoring Hope Campaign. The Campaign has contributed in excess of \$355,403, rebuilt nine homes in the month of October 2016, and is planning the Building Industry Association of Central South Carolina's Roofing Blitz for 40-50 homes; work is expected to begin in January 2017. The group's website portal "Get Connected" receives more than 5,000 hits per month by people looking for opportunities to volunteer in the area or assist with community needs.

From October 2015 through November 2016 MFRG has rebuilt or is completing 123 homes, 21 in the City of Columbia, 77 in Richland County and 25 in Lexington County. The most frequent unmet needs identified include:

- Roof repairs
- Mold remediation
- Mobile home repairs
- Major home repairs
- Materials for home repairs
- Rental assistance during home repair
- Fallen trees
- Foundation repairs

MFRG has closed 400 case management projects and is currently handling 1,053 open cases.

### **3.2.3 Public Housing**

The City of Columbia operates 2,200 units of public housing, including multi-family, single family, and duplex buildings; high rises, mid rises, and elderly cottages. Styles range from 1950's era barrack quarters to new energy efficient duplexes. The Columbia Housing Authority (CHA) has a comprehensive Modernization Program in place to rehabilitate each complex using HUD Capital Funds, and has systematically replaced older public housing

units for the last 15 years. Rosewood Hills, Hammond Village and Latimer Manor were restored and revitalized in the last 6 years. Gonzales Gardens (280 units) and Allen-Benedict Court (224 units) will be restored upon receipt of sufficient funding.

Based on pre-applications submitted, CHA has a total of 872 individual applications for public housing for persons over age 50 (225 for persons 62 and over). In 2014, the wait time for most housing categories was almost four years; the elderly wait approximately one year. Availability for all applicants may substantially decrease as Columbia continues to grow and as tax credits expire and owners convert to private market rates.

Those 65 or older make up 9.2 % of the Columbia population. They tend to be white females (60.5%) and married or widowed. The City's elderly population are nearly two and a half times more likely to be military veterans and 40.5% report a disability. Of these, 92.2% live on social security. Empowering seniors to maintain a healthy, independent lifestyle and remain in their homes instead of moving to an assisted facility is critical to achieving the City's long term viability goals.

### **3.2.4 Housing for the Homeless**

The City of Columbia is a member of the Midlands Area Consortium for the Homeless (MACH), a 14-county Continuum of Care that seeks to end homelessness by making a difference in the lives of people who are experiencing homelessness. MACH promotes collaboration and planning among state and local governments, corporate and non-profit organizations, and faith-based entities that support individuals and families in their quest to move from homelessness to housing.

Columbia offers various homeless shelters and services for a diverse homeless population that includes families with children, elderly and the disabled, and unaccompanied youth. The City operates 54 facilities providing shelter for the homeless; 523 are year-round emergency shelter beds; another 235 are seasonal/overflow beds; 741 units are transitional housing beds, and 1,239 are permanent supportive housing with an additional five under development. Part of the City's long term strategy against homelessness includes expanding the Winter Emergency Shelter, which would provide emergency and transitional beds, showers, food, transportation, and case management in a 24 hour, 7 days a week, year-round facility and to establish a fulltime homeless coordinator position.

Columbia partners with the Midlands Housing Alliance/Transitions to connect the homeless with resources that lead to permanent housing. The Housing First Pilot Program, funded for the last five years in cooperation with the South Carolina School of Medicine and CHA, provided 25 units per year of permanent housing and intensive support services, reducing the need for emergency room care, improving income potential and assisting in maintaining housing stability. Housing First outreach served more than 600 persons in the last 24 months.

Columbia actively participates in the local Continuum of Care providing services ranging from outreach to permanent housing, for families, children, youth, individual men and women, the chronically homeless, veterans, and women and children who are victims of

domestic violence. These public services include homelessness prevention and advocacy; legal and financial assistance; utility, rental and mortgage assistance; street outreach; substance abuse treatment, childcare, education, employment training and life skills, healthcare, mental health counseling, and youth services.

As more than a thousand homes were damaged during the October 2015 flood, the need for safe, affordable, livable housing has expanded. When planning disaster recovery efforts, it is essential to identify the needs of the most vulnerable populations -- children, the elderly, economically disadvantaged, homeless and those with physical, developmental or mental disabilities. Ensuring that these households have access to information, resources, and quality housing stock is a priority for the City's long-term public safety and community resilience goals.

### 3.3 Existing Infrastructure Conditions

Columbia is experiencing substantial development and population growth, which places greater demands on its infrastructure such as housing, transportation and other community facilities. Proper planning helps citizens and government account for and prepare for future change thereby ensuring the best, most efficient use of City resources. Basic services such as water and sewer, fire protection and police are some of the largest, most vital services offered today. As Columbia has grown, resident needs have expanded and the facilities supporting the community have as well. These services and facilities also are a major factor contributing to residents' quality of life.

- The Solid Waste Department has one of the most vital and intensive work demands in the city and helps ensure a clean, healthy Columbia. Workers collect roughly 92,000 tons of material a year and the expansion of municipal boundaries has created a strain on equipment, operations and workforce.
- The Street Department maintains 475 miles of roadways; constructs and maintains storm drains, sidewalks, curbs and gutters, and pavement repairs. More than \$5 million will be necessary to address the backlog of street and intersection projects requiring repaving and or reconstruction.
- The Traffic Engineering Department is responsible for the city's major corridors, which are undergoing physical and signal upgrades and replacements.
- The Water and Sewer Department focuses on upgrading existing systems and helps ensure the existing infrastructure will last much longer. Current capacity at Canal Water Plant is 85 million gallons daily (MGD), Lake Murray Plant draws 75 MGD, combined capacity of 160 million gallons. Planned expansion will address equipment and facility age considerations as the historic facility modernizes and plans for future. The City implemented Impervious Surface Tax has increased the rate of repair and updating to existing storm water system with improvements totaling more than \$50 million. An estimated \$350 million will focus on these systems more than next 10 years, but an increase in funding will be necessary to keep pace with a growing list of projects.
- The last upgrade and expansion of the sewer treatment plant took place in 1996, maintaining a level of 40-60 MGD. Three projects are planned to increase capacity to 80 MGD in 10 years. Sewer lines have not received the same level of focus as water lines. The system has aged and new funding is needed for a system-wide review and analysis to ensure appropriate service levels and longevity.

- Emergency responders are located at three new fire stations and are scheduled to fill gaps in response times. The Police Department recently inspected stations and facilities and has recommended the construction of a secure facility to store equipment and records, expand the current police department to include a secured facility, and build a new training facility with fire arms and driving range.
- In addition, the Public Library has identified capital needs and expansion plans to meet the growing demand of its citizens.

### 3.4 Existing Economic Development Conditions

Economic development is critical to achieving the type of community the citizens of Columbia want to embrace over the next decade. A vibrant and growing economy contributes to the quality of life by creating a variety of job opportunities, supporting a wide and diverse marketplace, and providing a supportive tax base for the services and amenities provided.

Columbia is one of the fastest growing metro areas in the Southeast and boasts the 69<sup>th</sup> largest metro economy in U.S. The City is home to state government, six major universities, including USC, and the nation's largest Army training center. The City's economy, once dependent primarily on textile manufacturing is now home to advanced manufacturing, healthcare, technology, shared services, logistics and energy companies. Apartment and student housing are the main forces behind the resurgence of the Main Street area.

Business in Motion, the City's business retention and expansion program, is conducted in conjunction with the Greater Columbia Chamber of Commerce. The program conducts proactive outreach to local businesses to ensure they have the services and resources needed to grow.

To promote economic development in underdeveloped areas and to aid its lower income citizens in obtaining safe and affordable housing, the City uses its Redevelopment Program fund and Economic Development fund. These funds finance various home rehabs and mortgage lending programs and ensure continued building and investment in the city.

Through a collaboration with TN Development Corp and Eau Claire Development Corp, the City administers a job training program called Work It Up. The program assists citizens who are unemployed or underemployed gain the experience needed to obtain jobs earning a livable wage and benefits, thereby improving the quality of life for families while strengthening communities. Applicants receive up to \$4,000 in grant funds to cover costs of tuition, books, some child care, and transportation. To date 86 individuals have been accepted into the program and 27 have successfully completed the program.

The City's Main Street Capital Program is designed to encourage a diverse mix of retail businesses between the 100 and 1700 blocks of Main Street. Applicants are eligible for loans up to \$50,000 to be paid off within 10 years. If all program requirements have been met after five years, the balance of the loan will be forgiven. During the 2015 fiscal year, the program leveraged more than \$214,000 in private investment or \$2.50 in private investment for every \$1 dollar of public funds invested.

## 4.0 Impact of the Disaster

The City of Columbia damage assessment is based on FEMA, SBA, HUD, and U.S. Census information, and was verified by door-to-door inspections by nonprofit partners and the City staff. As demonstrated in the following analysis, minor damages occurred at scattered sites outside of the floodplain; the most severe damage occurred in the Special Flood Hazard Areas where approximately 25% of the households are low to moderate income.

In accordance with HUD guidance, the City of Columbia analyzed the impacts of the disaster to identify the level of citywide damage, which will be used as the basis for an unmet needs assessment and identification of priorities for CDBG-DR funding. The assessment below utilizes federal, state, and city resources including data provided by FEMA, HUD and SBA to estimate the level of damage in three categories: housing, infrastructure, and economic development.

### 4.1 Housing

In accordance with the guidance set forth in the Federal Register Notice, the City has analyzed the FEMA Individual Assistance (IA) population of owner and renter occupied residences. The amount of damage to owner occupied residences is based upon the following FEMA defined tiers:

**Table 5: FEMA Defined Owner Levels of Damage**

Type	Definition
<b>Minor-Low</b>	<i>Less than \$3,000 of FEMA-inspected real property damage</i>
<b>Minor-High</b>	<i>\$3,000 - \$7,999 of FEMA-inspected real property damage</i>
<b>Major-Low</b>	<i>\$8,000 - \$14,999 of FEMA-inspected real property damage and/or 1'-4' of flooding on the first floor</i>
<b>Major-High</b>	<i>\$15,000 - \$28,800 of FEMA-inspected real property damage and/or 4'-6' flooding on the first floor</i>
<b>Severe</b>	<i>Greater than \$28,800 of FEMA-inspected real property damage or determined destroyed and/or 6' or more flooding on the first floor</i>

**Table 6: Levels of Damage for Owner-Occupied Households**

Damage Type	LMI* Owner Occupied			All Owner Occupied			Percentage Households LMI	Percentage Dollars LMI
	Quantity Damaged	Average RP FVL	Total RP FVL	Quantity Damaged	Average RP FVL	Total RP FVL		
Minor-Low	1,122	\$631	\$708,525	2,273	\$737	\$1,674,658	49.4%	42.3%
Minor-High	76	\$4,620	\$351,111	185	\$4,503	\$833,059	41.1%	42.1%
Major-Low	27	\$6,214	\$167,766	67	\$7,169	\$480,320	40.3%	34.9%
Major-High	18	\$21,553	\$387,962	70	\$21,590	\$1,511,293	25.7%	25.7%
Severe	31	\$44,363	\$1,375,264	122	\$43,191	\$5,269,336	25.4%	26.1%
<b>Total</b>	<b>1,274</b>	<b>\$2,347</b>	<b>\$2,990,627</b>	<b>2,717</b>	<b>\$3,595</b>	<b>\$9,768,666</b>	<b>46.9%</b>	<b>30.6%</b>

\*LMI calculation based on self-reported income to FEMA

Source: FEMA IA, July 2016



At the time of this analysis, 2,717 owner-occupied households had applied for FEMA IA assistance. Based upon FEMA damage assessments, owner-occupants suffered an estimated \$9.768 million in Real Property FEMA Verified Loss (RP FVL) attributed to the October 2015 flood event. However, the majority of owner occupied homes (2,273 or 83.7 %) were categorized as having only “Minor-Low” damages. GIS mapping of properties with “Minor-Low” damages show that these residential structures are located at scattered locations across the city and mostly outside of the floodplain. Based upon self-reported income, 49.4% of owner-occupants in areas with “Minor-Low” damages are low to moderate income. Due to the scattered site locations of these properties, the ethnic, racial, and elderly populations in these areas closely reflect the demographics of the City overall with the same vulnerabilities as evaluated in *Action Plan Section 3 Demographic Profile of Impacted Areas*.

As can be seen in Table 6, a total of 192 owner-occupied properties received a FEMA damage assessment categorized as “Major-High” or “Severe” damage. GIS mapping of these properties show that almost 100% of homes with this level of damage are located in the floodplain along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch. Based upon self-reported income data, only 25.5% of those homeowners categorized as “Major High” or “Severe” were low-to-moderate income. During the development of the Action Plan, the City also assessed the impact of the flood event on ethnic, racial, elderly, and low income populations. This assessment was conducted by reviewing 2010 Census Tract information for the areas with highest concentrations of “Major” and “Severe” damages in Lake Katherine, Central and Lower Gills Creek, Wildcat Creek and Penn Branch. Table 27 – 29 in *Action Plan Section 6.4.7.4* shows the breakdown of these populations in relation to the Census Tracts most impacted by the flood. 2010 Census Tract information for impacted areas demonstrates that the population residing in housing most damaged by the flood were Non-Hispanic (89%), White (68%), and under the age of 65 (96%). However, the only exception is the disproportionate impact to the African American households in the Central and Lower Gills Creek areas. In these areas, 2010 Census Data shows that 58% of the population is African American, which is significantly higher than all other concentrated areas of FEMA “Major” and “Severe” damage. Self-reported income data for Central and Lower Gills Creek also shows that there are a higher number of low income rental households that potentially could be displaced by buyout or rehabilitation activities.

Notably, less than 50 percent (46.9%) of all FEMA IA owner-occupants are classified low-and-moderate-income (LMI). Mindful of this distribution, the City is committed to meeting the needs of its storm-affected LMI population and strives to devote more than 70.0% of its CDBG-DR allocation to the benefit of LMI residents and communities that were the most impacted by the October 2015 rain and flood event. In addition, it is estimated that 100% of low-to-moderate income households in damaged homes designated with “Major” or “Severe” damages will be provided an opportunity for assistance.

As of July 2016, the FEMA IA program distributed \$5,693,220 million in grants to 1,396 homeowners to complete repairs. After FEMA IA distributions, there are a total of 1,611 owner-occupants who have an aggregate unmet need of more than \$5.8 million. It is noted that this amount is based upon FEMA damage assessments and does not take into consideration actual rebuilding costs and increased costs associated with elevation and resiliency standards. These costs have been factored into the City of Columbia allocation strategy. Of the population with unmet needs, 836 of 1,611 (51.9%) have self-reported their income as low-to-moderate.

Assessing impacts on renters is more challenging than for homeowners as renters are less likely to apply to FEMA for housing assistance, and their personal loss is typically reported as personal property (PP) losses rather than the amount of structural damages. However, there is data available through both IA and City inspections that indicates a strong need for the rehabilitation and redevelopment of affordable housing. While rental populations are more mobile than owner-occupied populations by nature and are, therefore, better-equipped to navigate the aftermath of a post-catastrophic event, the city recognizes the significant impact to renter households and loss of affordable housing units in Columbia. Tables 7 and 8 illustrate the levels of rental damage occurring in the city, as broken down by FEMA's categorization system:

**Table 7: FEMA Defined Levels of Damage for Renter Personal Property Losses**

Type	Definition
<b>Minor-Low</b>	<i>Less than \$1,000 of FEMA Inspected Personal Property Damage</i>
<b>Minor-High</b>	<i>\$1,000 - \$1,999 of FEMA Inspected Personal Property Damage</i>
<b>Major-Low</b>	<i>\$2,000 - \$3,499 of FEMA Inspected Personal Property Damage and/or 1'-4' of flooding on the first floor</i>
<b>Major-High</b>	<i>\$3,500 - \$7,499 of FEMA Inspected Personal Property Damage and/or 4'-6' of flooding on the first floor</i>
<b>Severe</b>	<i>Greater than \$7,500 of FEMA Inspected Personal Property Damage or determined destroyed and more than 6' of flooding on the first floor</i>

Per the above damage types, the City analyzed the affected rental population as a full population and as an LMI subset. Among the FEMA IA applicants identified as renters, 89.8% are classified as LMI, and 86.3% of the FEMA PP FVL renter damage was incurred by LMI applicants. Of the 138 rental households with "Major-High" or "Severe" damage levels, 88.4% are classified as LMI. The majority of "Major-High" and "Severe" rental properties are located in the floodplain along Lower Gills Creek which has a higher concentration of African American households.

**Table 8: Levels of Damage for Renter-Occupied Households**

Damage Type	LMI* Renter Occupied			All Renter Occupied			Percentage Households LMI	Percentage Dollars LMI
	Quantity Damaged	Average PP FVL	Total PP FVL	Quantity Damaged	Average PP FVL	Total PP FVL		
Minor-Low	216	\$423	\$91,306	227	\$427	\$96,832	95.2%	94.3%
Minor-High	42	\$1,358	\$57,054	49	\$1,359	\$66,610	85.7%	85.7%
Major-Low	71	\$1,916	\$136,008	88	\$2,033	\$178,906	80.7%	76.0%
Major-High	70	\$4,721	\$330,468	83	\$4,794	\$397,886	84.3%	83.1%
Severe	52	\$5,934	\$308,553	55	\$6,005	\$330,287	94.5%	93.4%
<b>Total</b>	<b>451</b>	<b>\$2,047</b>	<b>\$923,389</b>	<b>502</b>	<b>\$2,133</b>	<b>\$1,070,521</b>	<b>89.8%</b>	<b>86.3%</b>

\*LMI calculation based on self-reported income to FEMA

Source: FEMA IA, July 2016

Based upon this data, the City is concerned about the concentrated areas of rental housing damage in the floodplain and Lower Gills Creek. The City recognizes that the loss of rental units is significant it has a limited amount of affordable housing, making it more difficult for renters to

adapt to post-flooding conditions. As a result, the City of Columbia will encourage landlords with damaged rental units located in the floodplain to participate in the City's CDBG-DR and FEMA funded buyout programs and has also allocated 31.3% of CDBG-DR funding to rehabilitate damaged affordable rental properties outside of floodplain areas.

As previously discussed, homes with the most damage are concentrated along the floodplain in the five areas listed in Table 9 and 10 and described in the following sections.

**Table 9: Breakdown of Most Affected Owner-Occupied Households**

Location	Quantity Not Funded	Quantity Damaged	Average RP FVL	Total RP FVL	LMI Households	LMI RP FVL
Lake Katherine	79	94	\$29,599	\$2,782,270	26.6%	28.8%
Central Gills Creek	45	57	\$37,859	\$2,157,940	19.3%	21.6%
Wildcat Creek	18	29	\$33,774	\$979,432	27.6%	26.1%
Lower Gills Creek	16	25	\$18,069	\$451,714	24.0%	17.8%
Penn Branch	16	23	\$26,675	\$613,525	30.4%	28.0%
<b>Total</b>	<b>174</b>	<b>228</b>	<b>\$29,195</b>	<b>\$6,984,881</b>	<b>25.6%</b>	<b>24.5%</b>

Source: FEMA IA, July 2016

**Table 10: Breakdown of Most Affected Renter-Occupied Households**

Location	Quantity Damaged	Average PP FVL	Total PP FVL	LMI Households	LMI PP FVL
Lake Katherine	0	\$0	\$0	0.0%	0.0%
Central Gills Creek	13	\$4,716	\$61,313	76.9%	67.5%
Wildcat Creek	10	\$7,739	\$77,393	80.0%	88.8%
Lower Gills Creek	94	\$4,370	\$410,798	83.0%	85.2%
Penn Branch	17	\$3,778	\$64,226	70.6%	63.0%
<b>Total</b>	<b>134</b>	<b>\$4,121</b>	<b>\$613,730</b>	<b>77.6%</b>	<b>76.1%</b>

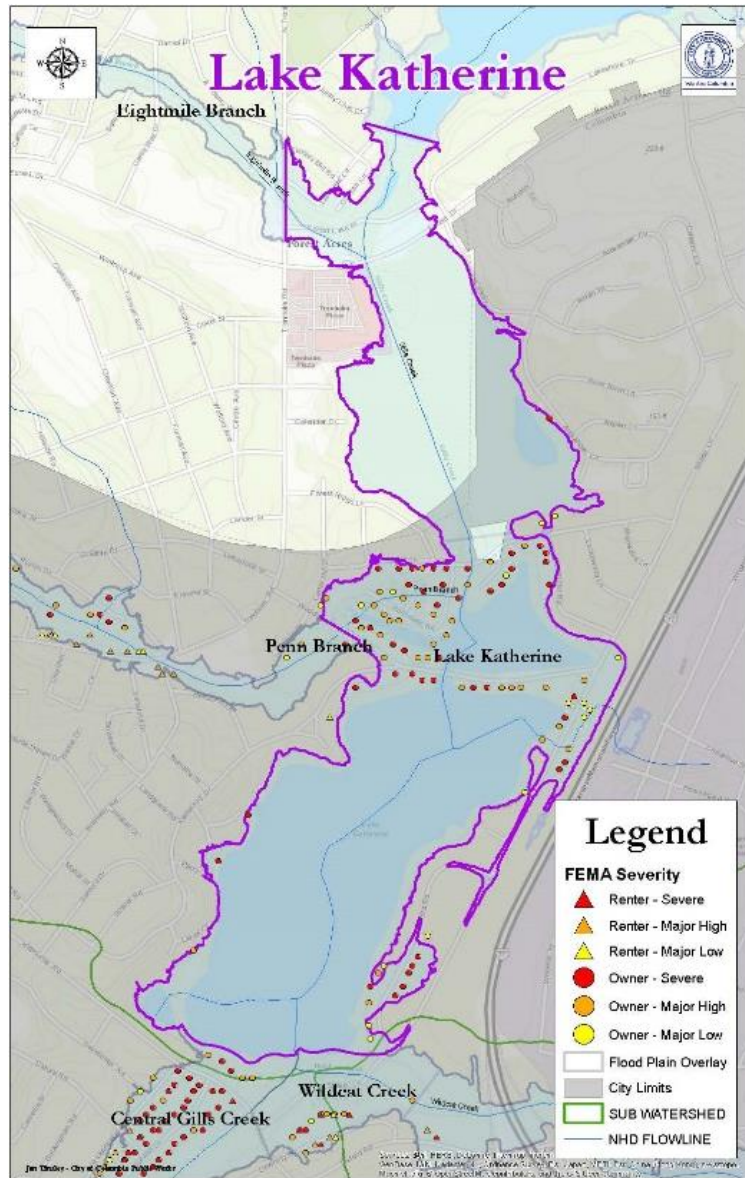
Source: FEMA IA, July 2016

#### 4.1.1 Lake Katherine

Residents of Lake Katherine have the highest concentration of “Major” and “Severe” owner-occupied damages. More than 35.9% (94 of 259) of all of Columbia’s owner-occupied structures categorized as “Major” and “Severe” are located in this area. Additionally, only one home in this area suffered “Minor-Low” damage. According to FEMA data, owners along Lake Katherine sustained more than \$2.7 million in damages which is an average of \$29,599 per household. Of this sub-population, 26.6% of households self-reported their income as low to moderate. No renter occupied properties were reported by FEMA. 2010 Census Tract information for the area shows that the majority of residents are Non-Hispanic (94%), White (92%), with a small portion of elderly households (18%).

An analysis of damages in the Lake Katherine area, based upon the best available data from FEMA, shows that there are more than \$2.3 million worth of damages to 79 owner-occupied properties that have not been otherwise funded. The majority of these homes (83.5%) sustained Major-High or Severe damages. For the 79 homes that have damages, 25 of these households are LMI households and have losses of \$659,972. Of the 25 LMI households with unmet needs, all sustained Major or Severe damages.

Due to the low concentration of LMI households, it is anticipated that most owners in this area may participate in the Elevation Reimbursement Program. In addition, these homeowners will be eligible to participate in the proposed CDBG-DR Buyout Program.



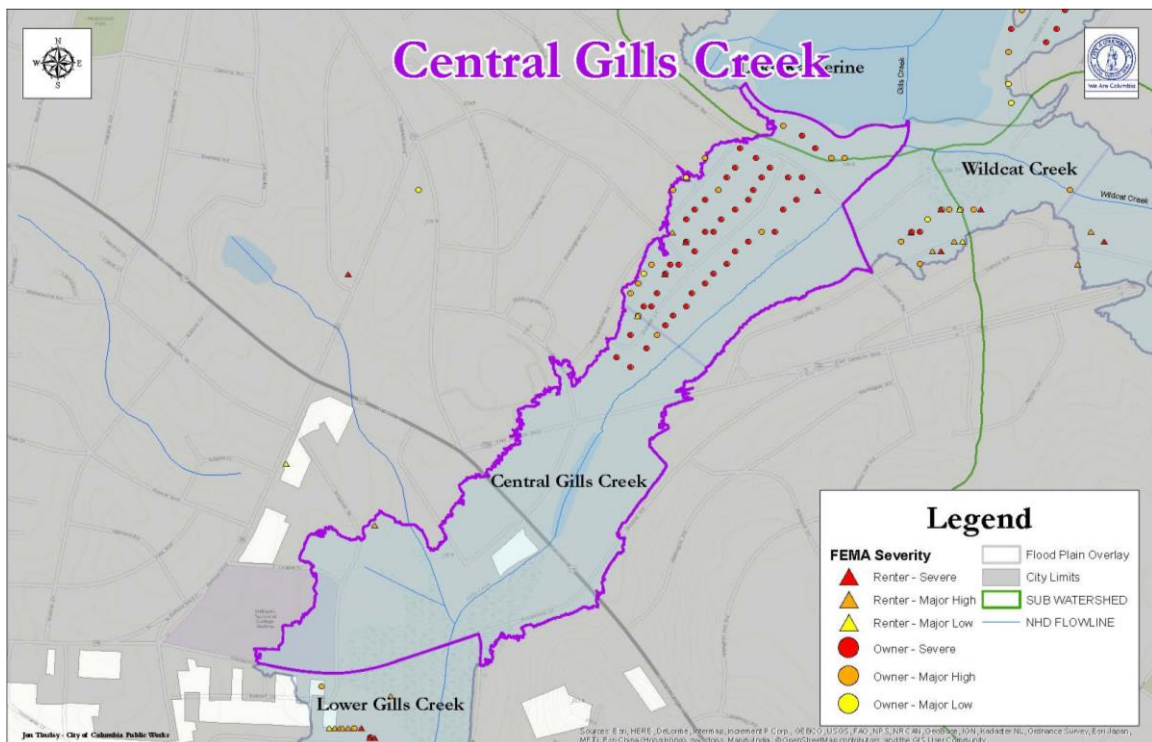


### 4.1.2 Central Gills Creek

Central Gills Creek has the second highest concentration of “Major” and “Severe” owner-occupied damages. More than 22.0% (57 of 259) of all of Columbia’s owner-occupied structures categorized as “Major” and “Severe” are located in this area. According to FEMA data, owners along Central Gills Creek sustained almost \$2.2 million in damages which is an average of \$37,859 per household. Of the Central Gills Creek population, 19.3% of households self-reported their income as low to moderate reflecting 21.6% of the damages in this area. Unlike the Lake Katherine area, there is a small population of rental occupied households in Central Gills Creek. The average personal property loss for renters is reported as \$4,716. Of the rental occupied households, 76.9% self-reported their income as low to moderate. 2010 Census Tract information for the area shows that the majority of residents are Non-Hispanic (89%), Black (58%), with a small portion of elderly households (5%).

An analysis of the Central Gills Creek area, based upon the best available data from FEMA, shows that there are more than \$1.5 million worth of damages to 45 owner-occupied properties that have not been otherwise funded. All of these homes sustained “Major” or “Severe” damages. Of these 45 owner-occupied homes, there are seven LMI households that have losses of \$294,784.

Although Central Gills Creek has a small concentration of rental homes, census tract information indicates that these damaged units may be occupied by vulnerable minority households which may benefit from the proposed Small Rental Repair Program. It is anticipated that most owner-occupied households in this area may participate in the Buyout Program or Elevation Reimbursement Program.



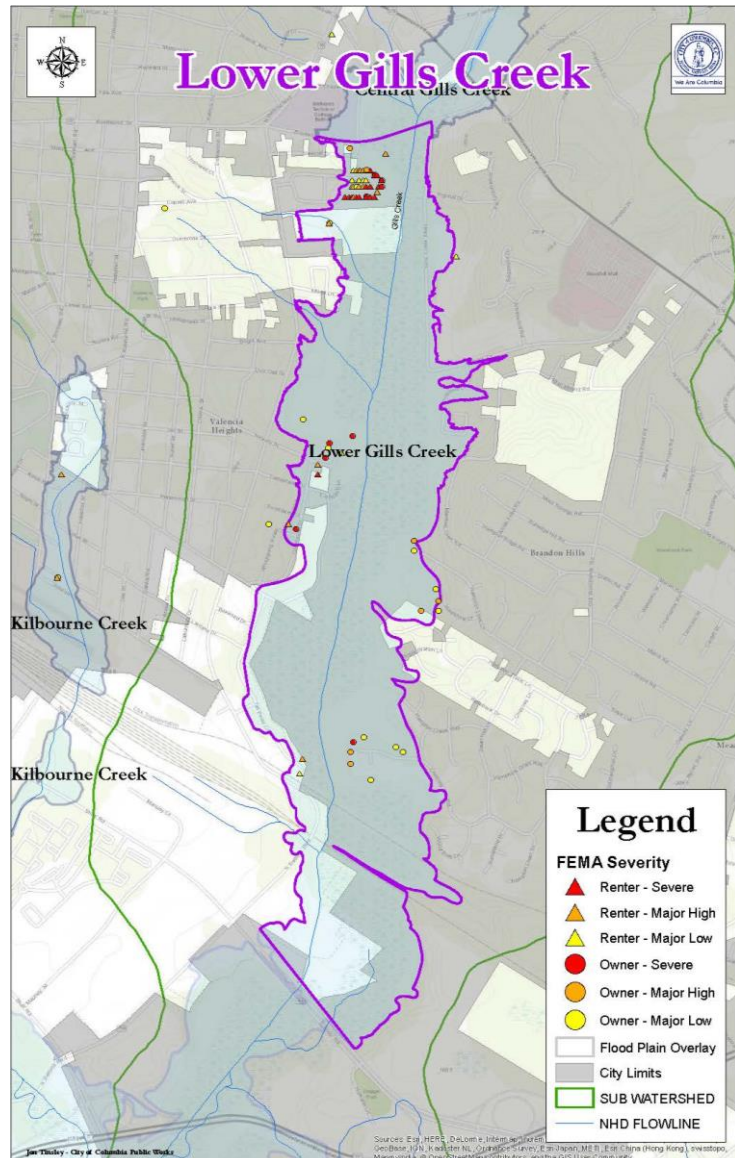




#### 4.1.4 Lower Gills Creek

Lower Gills Creek had the fourth highest concentration of Major and Severe owner-occupied damages with 25 dwellings sustaining \$451,714 of damages according to FEMA. Of the owner occupied households, 24.0% self-reported as low to moderate income. Additionally, the Lower Gills Creek area reported the highest number of rental occupied properties, 94, of which 83.0% self-reported their income as low-to-moderate. This LMI population sustained 85.2% of the area's personal property losses for renters. 2010 Census Tract information for the area shows that the majority of residents are Non-Hispanic (89%), Black (58%), with a small portion of elderly households (5%).

An analysis of the Lower Gills Creek area, based upon the best available data from FEMA, shows that there are \$323,943 in damages to 16 owner-occupied properties that have not been otherwise funded. All of these homes sustained Major or Severe damages. Of this population, only one LMI household sustained Major-Low damage with losses of \$8,019.



It is anticipated that most owners in this area may participate in the Homeowner Assistance and Elevation Reimbursement Programs. In addition, owners in this area will be eligible to participate in the city's proposed CDBG-DR and FEMA Buyout programs. It is also anticipated that LMI tenants will benefit from the Small Rental Repair Program.



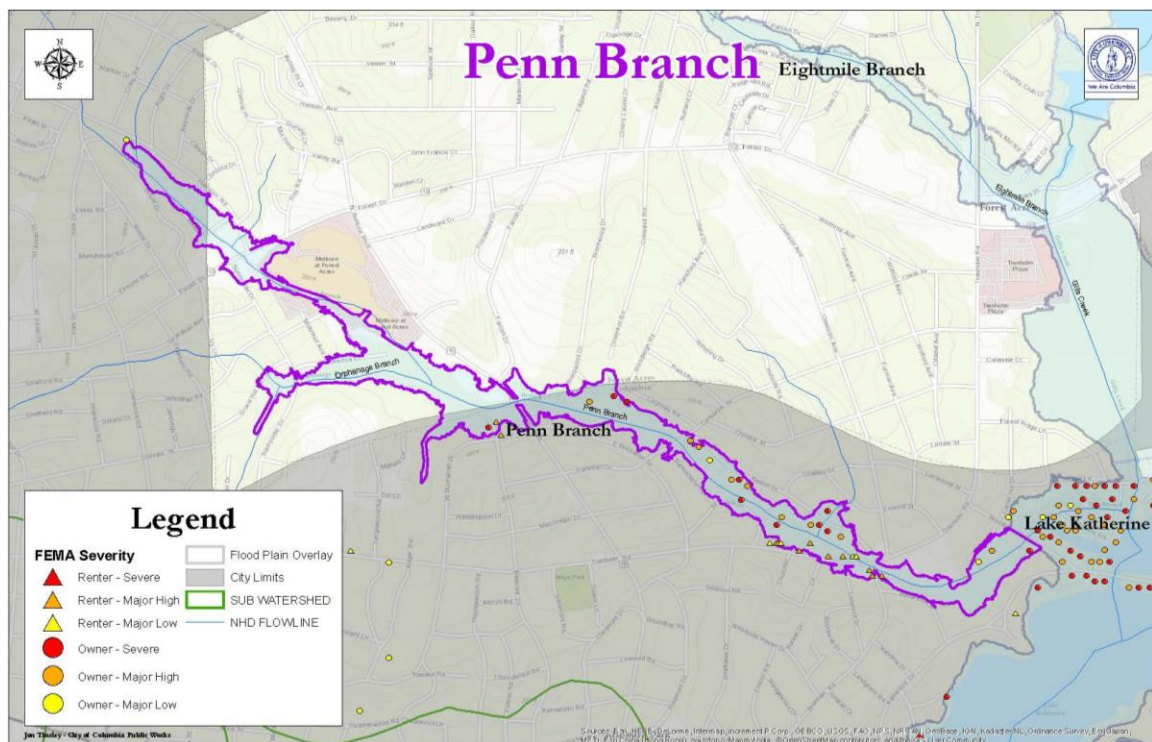
### 4.1.5 Penn Branch

Residents of Penn Branch, a tributary to Lake Katherine, also experienced Major and Severe damages to owner-occupied properties at several locations. In this area there is an even mix of owner-occupied and rental residential dwellings that experienced Major and Severe losses. A total of 23 owner-occupied dwellings sustained \$613,525 in damages, and seven owner occupants (30.4%) self-reported their income as low to moderate income. These seven LMI owners account for 28.0% of the damages.

In addition to the owner-occupied households, there are 17 renter-occupied households in the Penn Branch area who sustained \$64,226 in damages to their personal property. Of the rental population, 70.6% self-reported their income as low to moderate, and this LMI population sustained 63.0% of the area's total personal property damages reported to FEMA. 2010 Census Tract information for the area shows that the majority of residents are Non-Hispanic (99%), White (90%), with a small portion of elderly households (12%).

An analysis of the Penn Branch area, based upon the best available data from FEMA, shows that there are \$392,866 worth of damages to 16 owner-occupied properties that have not been otherwise funded. All of these homes sustained Major or Severe damages. Of this number four LMI households sustained losses of \$130,008.

It is anticipated that most owners in this area may participate in the Homeowner Assistance and Elevation Reimbursement Programs. These owners will be eligible to participate in the city's proposed CDBG-DR and FEMA Buyout programs. It is also anticipated that LMI tenants will benefit from the City's Small Rental Repair Program.



#### **4.1.6 Disaster Impact on Public Housing Authorities**

In order to understand the impacts of the October 2015 rain and flood event on Public Housing Authorities (PHA), the City of Columbia collaborated with the Columbia Housing Authority (CHA) on the unmet needs assessment for the Action Plan. CHA has provided affordable housing to the citizens of Columbia and Richland County since 1934 and is responsible for the administration of all public housing developments, project-based and Section 8 vouchers. In conjunction with the its unmet needs assessment, the City asked CHA to assess storm related damages and unmet at CHA's administrative buildings, public housing developments, and at any development at which CHA has allocated project-based vouchers. The City also requested information related to privately owned units housing participants in the Section 8 Housing Choice Voucher Program.

Subsequently, CHA reported that all of its administrative buildings were covered by insurance and have already been repaired. However, 26 CHA apartment units were completely flooded. All units were covered by insurance and have been repaired with the exception of one unit. This unit is located outside of city limits in Richland County in an area that will not be rebuilt. CHA is currently working with the county to participate in its CDBG-DR buyout program for this property. In addition to the apartment units, CHA reports that all the project-based housing developments were under construction at the time of the October 2015 flood event and were not damaged.

CHA also reported that most damages were sustained by privately owned units that provide housing for participants in the Section 8 Housing Choice Voucher Program. The CHA Section 8 Program had more than 100 privately owned units damaged with many of the tenants displaced by the flooding. Fortunately, CHA was able to relocate all tenants into other units with a voucher. CHA cannot report on the status of the rebuilding of the damaged rental units as the units are privately owned and CHA is not responsible for the repairs. At this time, CHA states that there is no additional need for CDBG-DR funding.

The city will continue to identify and assess impacts on CHA Section 8 units, particularly the unmet repair and rebuilding needs not otherwise covered by insurance or FEMA.

#### **4.1.7 Impact to Transitional Housing, Emergency Sheltering, and Homelessness**

The October 2015 flood event impacted owner-occupied housing as well as those who occupy Permanent Supportive Housing, Transitional Housing, and those who are homeless residing in Emergency Shelters. In some cases, these households can experience more adversity during initial emergency response and intermediate recovery efforts as more permanent owner occupied households seek refuge and/or alternative housing options. This unexpected surge in housing needs can quickly overburden existing housing providers.

According to data received by the United Way, the Midlands Section of the state had a total of 248 persons who resided in Permanent Supportive Housing and 513 persons who resided in Transitional Housing the year prior to the flood event. In addition, a total of 381 persons resided in Emergency Shelters during the reporting period from October 1, 2014

to September 30, 2015. Prior to the event, an average of 59 individuals were housed in shelters on any given night. The United Way also reports that 311 individuals in the Midlands were chronically homeless as of January 27, 2016. Of this number, 164 persons resided in Emergency Shelters and 147 persons were reported as Unsheltered.

In response to flooding in the City of Columbia, non-profit groups and agencies quickly responded to assist all households in need of recovery assistance. As a result, the Red Cross opened eight shelters to serve displaced households in and around the city. These shelters opened on October 4, 2015 and served approximately 382 persons in 17 days. The last shelter servicing displaced households in Columbia was closed on October 21, 2015.

In order to minimize flood related impacts to the area's most vulnerable populations, the Richland-Lexington Counties Long Term Recovery Group (RL-LTRG) was established to maintain a network of agencies and provide coordinated support for local recovery efforts benefiting the residents of both counties. The City of Columbia is an active participant in this group. The RL-LTRG was formed in conjunction with the United Way of the Midlands with the purpose of strengthening area-wide disaster recovery efforts by:

- Coordinating recovery efforts among organizations and entities that provide volunteer, financial, spiritual, physical, and/or psychological support for persons whose lives have been impacted by the disaster.
- Facilitating and coordinating case management and long term recovery assistance to individuals affected by the disaster who do not have adequate personal resources for their basic needs.
- Providing leadership to identify and address long term needs for recovery and rehabilitation.
- Coordinating advocacy initiatives with key policy makers and public service providers to develop policy changes that meet the needs of affected people and communities.
- Fostering coordination and integrated approaches intended to rebuild the human service sector and meet evolving recovery needs.

To date, RL-LTRG has made significant progress in achieving these goals. In addition to a large case management load of more than 750 residents in Richland County, 17 rebuilding projects have been completed and five are currently underway in the City of Columbia. In conjunction with these efforts, the City has committed a significant portion of its CDBG-DR funding (31.3%) for the repair and reconstruction of affordable rental housing in order to ensure that sufficient resources are available for the its most vulnerable populations. The City also seeks to ensure that rehabilitated rental housing is located in desirable areas with mixed incomes and housing types where possible. The city's Small Rental Repair Program (SRRP) is programmed to ensure that restored rental units are only available for re-occupancy of LMI households at or below Fair Market Rates for 3 years.

At this time, there is no need for funding for additional public service activities.

## 4.2 Infrastructure Damages

The catastrophic rainfall and flooding experienced in Columbia caused widespread damages to the city's water control facilities, public buildings, roads, and bridges. The most notable damage was the breach of the Columbia Canal and its impacts upon City public facilities and services to the state's capitol. To assess unmet infrastructure needs for CDBG-DR funding, the city developed damage assessments and obtained engineering estimates in order to participate in FEMA's Public Assistance (PA) program. The following table illustrates how those damages are documented and categorized.

**Table 11: FEMA PA Categories**

Category	Definition	Total Damages	25% Cost Share
A	<i>Debris Removal</i>	\$585,109	\$146,277
B	<i>Emergency Protective Measures</i>	\$8,263,554	\$2,065,888
C	<i>Road Systems and Bridges</i>	\$1,306,878	\$326,719
D	<i>Water Control Facilities</i>	\$77,447,170	\$19,361,793
E	<i>Public Buildings and Contents</i>	\$288,151	\$72,038
F	<i>Public Utilities</i>	\$8,797,049	\$2,199,262
G	<i>Parks, Recreational and Other Items</i>	\$154,110	\$38,528
<b>Total</b>		<b>\$96,842,021</b>	<b>\$24,210,505</b>

Source: City of Columbia, November 2016

To date, FEMA has obligated almost \$12 million to assist in repairs to facilities, equipment, utilities and miscellaneous losses from the storm. Another \$85 million in projects has been identified and is being documented and submitted for FEMA consideration, with the largest project being associated with repairs to the Columbia Canal and Head Gates. The City of Columbia is also pursuing other FEMA and HUD grants to address the needs of city assets including FEMA's Hazard Mitigation Grant Program, Pre-Disaster Mitigation, and Flood Mitigation Program grants, as well as the HUD Community Development Block Grant Disaster Recovery Program.

## 4.3 Economic Development Losses

The extensive rainfall and flooding of early October 2015 severely impacted Columbia area businesses. Many businesses experienced damage to their facilities, stock, and equipment, and some businesses were totally destroyed. Even businesses that did not have physical damage from the storms were closed for an extended period causing significant losses in revenue.

Columbia businesses began to experience the adverse economic impacts of the flood event on October 1, 2015, when many businesses closed in preparation for the storm. Businesses remained closed until October 5<sup>th</sup> with unmet needs continuing to this day. Estimates of the gross impact of the flood event are based on a combination of evacuation orders, school closures, outage data, anecdotal accounts and a survey collected by Columbia's Office of Business Opportunity (OBO) in the days following the rain and flood. As a result, Columbia's OBO was able to assess some immediate impacts of the storm on local businesses.



A total of 61 businesses responded to OBO's survey immediately following the flooding. Thirty-five respondents (55.7%) indicated they sustained a direct impact from the storm. As part of the survey, respondents were asked to provide their business' recovery needs. More than 46.9% of responding business owners reported that loss of revenue was the biggest recovery need with lost wages being ranked second at 32.7%. Additionally, 28.6% reported structural damage to their business. Adding to these and other losses, more than 58.6% of respondents stated they did not have sufficient insurance to cover their losses.

Based upon SBA data, there are 205 damaged properties (165 businesses) within Columbia with verified losses of more than \$14.4 million. As of August 2016, SBA has made 165 loans to impacted businesses (some with multiple loans, financing more than \$12.0 million. The following chart illustrates the quantity of SBA loans by NAICS industry.

As can be seen from this table, the most impacted industries were Real Estate, Rental and Leasing; Other Services; and Wholesale Trade.

**Table 12: SBA Business Loans**

NAICS Industry	Quantity Approved	Approved Amount*	Total Estimated Damage
Agriculture, Forestry, Fishing and Hunting	0	\$0	\$0
Mining, Quarrying, and Oil and Gas Extraction	0	\$0	\$0
Utilities	0	\$0	\$0
Construction	2	\$6,300	\$3,371
Wholesale Trade	2	\$569,600	\$364,572
Information	0	\$0	\$0
Finance and Insurance	0	\$0	\$0
Real Estate and Rental and Leasing	99	\$4,092,130	\$4,773,752
Professional, Scientific, and Technical Services	8	\$1,148,300	\$686,211
Management of Companies and Enterprises	0	\$0	\$0
Administrative and Support and Waste Management and Remediation Services	3	\$184,200	\$96,170
Educational Services	2	\$178,800	\$155,664
Health Care and Social Assistance	7	\$1,138,000	\$1,092,618
Arts, Entertainment, and Recreation	1	\$496,100	\$498,625
Accommodation and Food Services	11	\$1,219,000	\$1,389,551
Other Services (except Public Administration)	13	\$1,023,400	\$2,256,603
Public Administration	0	\$0	\$0
Manufacturing	3	\$224,700	\$212,459
Retail Trade	12	\$2,395,400	\$2,943,747
Transportation and Warehousing	2	\$0	\$0
<b>Total</b>	<b>165</b>	<b>\$12,675,930</b>	<b>\$14,473,343</b>

\*Approved Amounts are calculated on a pro-rata distribution based on damages to the facilities within the City of Columbia per SBA loan.

Source: SBA, August 2016

## 5.0 Unmet Needs Assessment

The CDBG-DR program is considered a “gap” funding source and is intended to assist with recovery needs not covered by other public and private funding sources. While recovery efforts have continued without interruption since October, many impacts remain unaddressed due to several primary factors including: the profound extent and diversity of the damages to housing, infrastructure, and the economy; the unique conditions and vulnerabilities of City of Columbia residents and businesses; and the limitations of available funding assistance. This unmet need assessment provides essential information to better understand the most impacted areas and populations in the City, and guides development of the most effective recovery programs and priorities.

This section describes the City’s preliminary assessment of unmet recovery needs resulting from the October severe storm and flooding disaster (DR 4241). When major disasters occur, a significant amount of data and information must be collected and analyzed from numerous agencies, departments, and organizations. Accessing and compiling information on impacts and recovery resources can be a challenge due to varying quality, availability, formatting, and timing of different sources. Estimates of unmet needs are based on the best available information as of July and August 2016, and represent the City’s initial calculation of remaining recovery gaps. Since October 2015 nonprofit volunteer organizations such as Restoring Hope and the Midlands Flood Recovery Group have rebuilt 17 homes (four more are underway) within the City of Columbia at an estimated value of \$678,300, using an average contractor price of \$39,900 per home. This contribution is not itemized in the tables below, but will be noted as part of the Duplication of Benefits analysis during the applicant intake process. This assessment should be considered a living document that will be updated as specific household information becomes available.

Unmet needs were estimated through a comparison of financial impacts of the qualified disaster event with subsequent recovery funding that has been received or is anticipated. The City of Columbia has worked with the following agencies during the unmet needs assessment and has incorporated data from the following key sources:

- Federal Emergency Management Agency (FEMA) Individual Assistance (IA) Program
- FEMA Public Assistance Program (PA)
- Small Business Administration (SBA)
- National Flood Insurance Program (NFIP)
- Columbia Housing Authority (CHA)
- City of Columbia Building Department
- City of Columbia GIS and Planning Departments
- City of Columbia Consolidated Plan
- City of Columbia Comprehensive Plan
- City of Columbia Building and Permits
- City of Columbia Office of Business Opportunity (OBO)
- South Carolina Emergency Management Department
- Engineering estimates for FEMA PA Projects
- United States 2010 Decennial Census

- 2014 American Community Survey (ACS)
- Midlands Flood Recovery Group
- Volunteer Organizations Active in Disaster (VOAD)
- Public and Stakeholder outreach and feedback

This assessment is organized into three main categories: Housing, Infrastructure, and Economic Development. Identifying and documenting the needs across these three core areas allowed the City to strategically allocate limited resources to address the most critical recovery needs while making proactive resilience investments to minimize impacts of future flood events.

A high-level overview of the unmet needs assessment is shown in Table 13 using the best available data and information as of December 2016. It is critical to understand that these figures are initial estimates based on the available information at the time this plan was developed and revised.

Based upon this information, City of Columbia has identified \$120,505,571 million in unmet recovery needs. Although infrastructure is currently shown with the largest gap in funding, the City considers housing the largest unmet need due to the large number of residents impacted by the flood.

**Table 13: Unmet Needs Summary**

Recovery Area	Damage/Rebuild Costs	*Assistance Received	*Unmet Need
Housing	\$103,654,345	\$68,792,884	\$34,861,461
Infrastructure	\$96,842,021	\$11,995,324	\$84,846,697
Economic Development	\$14,473,343	\$12,675,930	\$1,797,413
<b>Total</b>	<b>\$214,969,709</b>	<b>\$94,464,138</b>	<b>\$120,505,571</b>

*\*Does not include mitigation or resiliency costs.*

*Source: FEMA, SBA*

## 5.1 Funding Sources and Uses Assistance Received and Expected

Table 14 identifies anticipated or expected funding sources and the area of need that will be addressed. Data obtained from FEMA, SBA, DOA and SCEMD, the City of Columbia is anticipating funding of \$94,464,138. These amounts include only funding that has been obligated or disbursed from other agencies.

**Table 14: Assistance Received and Obligated\***

Assistance Program	Housing	Infrastructure	Economic Development	Total
FEMA IA	\$19,722,933			\$19,722,933
FEMA PA		\$11,995,324		\$11,995,324
NFIP	\$13,541,451			\$13,541,451
SBA	\$35,528,500		\$12,675,930	\$48,204,430
DOA		\$1,000,000		\$1,000,000
<b>Total</b>	<b>\$68,792,884</b>	<b>\$12,995,324</b>	<b>\$12,675,930</b>	<b>\$94,464,138</b>

\*Data updated as of December 2016

Source: South Carolina Disaster Management Department, FEMA, SBA

## 5.2 Housing Unmet Need

This section of the Action Plan describes the data, information, and methodology that the City of Columbia used to calculate damages and unmet needs for housing. Based upon this information, the level of damage is estimated to be \$103,654,845. With \$68,792,884 in assistance received or anticipated, the total estimated unmet need is \$34,861,461.

**Table 15: Housing Unmet Needs**

Recovery Area	Damage / Need	*Assistance Received / Anticipated	*Unmet Need
Housing	\$103,654,845	\$68,792,884	\$34,861,461

Source: FEMA IA, July 2016 &amp; SBA, August 2016

During its analysis, the City of Columbia recognized a significant disparity between the amount of individual FEMA damage assessments versus the amount of individual SBA loans. SBA loan amounts more closely reflect actual rebuilding costs than FEMA damage amounts because the SBA data is derived at the applicant level and represents verifiable address-level information. The City has a high degree of confidence in using the SBA amounts to develop a multiplier that could be used to calculate unmet housing needs. Table 16 demonstrates the significant differences in each damage category between FEMA's loss assessments and SBA loans to repair residences. The multiplier is the ratio of actual building costs (average SBA loan) to FEMA estimated damages.

**Table 16: Owner-Occupied Households with RP FVL > \$0 and SBA Awards**

Damage	Damaged Structures	Average RP FVL	Average SBA Loan	Multiplier
Minor-Low	249	\$928	\$19,094	20.58
Minor-High	37	\$4,321	\$32,481	7.52
Major-Low	15	\$7,470	\$66,060	8.84
Major-High	31	\$21,754	\$99,103	4.56
Severe	56	\$43,123	\$136,023	3.15
<b>Total</b>	<b>388</b>	<b>\$9,258</b>	<b>\$45,455</b>	<b>4.91</b>

Source: FEMA IA, July 2016 & SBA, August 2016

With multipliers established at all five owner-occupied damage tiers, it was then applied to the entire IA owner-occupied population, resulting in a total damage estimate in excess of \$47.9 million as shown in Table 17. While this amount includes \$3.7 million in contents, this assessment demonstrates that there are twice as many unmet housing needs than there is funding available. Furthermore, the largest unmet need is in the minor loss category, which is associated with the City's LMI population. For this reason, the City of Columbia has allocated almost 100% of CDBG-Disaster Recovery resources to address this unmet housing need. The City's allocation strategy targets its most vulnerable households while also meeting the needs of those who sustained the majority of damages.

**Table 17: Real Property Damage Estimation**

Damage	Quantity Damaged	Total RP FVL	Multiplier	Damage
Minor-Low	2,273	\$1,674,658	20.58	\$34,464,459
Minor-High	185	\$833,059	7.52	\$6,264,605
Major-Low	67	\$480,320	8.84	\$4,246,026
Major-High	70	\$1,511,293	4.56	\$6,891,496
Severe	122	\$5,269,336	3.15	\$16,598,409
<b>Total</b>	<b>2,717</b>	<b>\$9,768,666</b>	<b>4.91</b>	<b>\$47,964,150</b>

Source: FEMA IA, July 2016

### 5.2.1 Housing Unmet Need Calculation

#### Owner Occupied Homes

The City of Columbia considers several factors in computing homeowner unmet need including:

- FEMA damage assessments
- SBA loan amounts
- FEMA/SBA Multiplier
- Costs of Resiliency (Energy and Water Efficiency), and



- Mitigation (Elevation) Costs

The calculation is as follows:

$$\begin{array}{r}
 \text{FEMA Damage Assessment} * \text{SBA Multiplier} \\
 + \text{ Resiliency Costs (Avg. \$1,917 per home)} \\
 + \text{ Mitigation Costs (Avg. \$70,000 per "Major" or "Severe" home in the floodplain)} \\
 \hline
 \text{Potential Unmet Need}
 \end{array}$$

After applying the FEMA/SBA multiplier at each damage level, the costs associated with resiliency (energy and water efficiency) are added to the calculation for all damaged structures. These costs are estimated to be \$1,917 per structure as identified in *Incremental Cost, Measurable Savings: Enterprise Green Communities Criteria* (outlined in Section 6.4.5 of the Action Plan). After adding resiliency costs, the average cost of elevation (\$70,000) is added for all homes in the floodplain categorized as "Major" or "Severe" damage. The average cost of elevation is based upon data obtained from the City of Columbia Floodplain Manager as outlined in Section 6.4.4 of the Action Plan.

Using this methodology, the City of Columbia estimates 2,717 owner-occupants need assistance (less duplication of benefits) with approximately \$66,612,639 in damages. It is important to note that SBA data are currently available at the address level, which adds a degree of realism to the perspective on damages and potential unmet needs. Also, these numbers do not capture residents who did not register for FEMA assistance, those who were denied assistance, or received insufficient funding to fully repair their homes. Filling in these gaps is a significant challenge which will be resolved during the applicant intake and Duplication of Benefits (DOB) verification processes.

**Table 18: Owner Occupied Unit Damages and Rebuilding Needs**

Damage	Quantity Damaged	Total RP FVL	Multiplier	Damages	Resiliency Cost	Mitigation Cost	Total Need
Minor-Low	2,273	\$1,674,658	20.58	\$34,464,459	\$4,357,341	\$0	\$38,821,800
Minor-High	185	\$833,059	7.52	\$6,264,605	\$354,645	\$0	\$6,619,250
Major-Low	67	\$480,320	8.84	\$4,246,026	\$128,439	\$0	\$4,374,465
Major-High	70	\$1,511,293	4.56	\$6,891,496	\$134,190	\$4,900,000	\$11,925,686
Severe	122	\$5,269,336	3.15	\$16,598,409	\$233,874	\$8,540,000	\$25,372,283
<b>Total</b>	<b>2,717</b>	<b>\$9,768,666</b>	<b>4.91</b>	<b>\$47,964,150</b>	<b>\$5,208,489</b>	<b>\$13,440,000</b>	<b>\$66,612,639</b>

Source: FEMA IA, July 2016 & SBA, August 2016

### Renter Occupied Homes

The calculation of need to repair damaged rental properties is more difficult because FEMA data regarding real property damages is not available. For the purposes of this analysis, the City assumed that the majority of damaged rental properties have characteristics similar to single family homes or duplexes. This assumption is supported

by the fact that 43% of damaged rental properties are categorized as “House/Duplex” by FEMA and that rental properties in the most impacted areas are single family homes, duplexes, and townhomes.

The City of Columbia considers the following factors in calculating unmet need for rental properties:

- FEMA damage assessments (number of structures damaged)
- Average Amount of Structural Damage (similar to single family homes/duplexes)
- Costs of Resiliency (Energy and Water Efficiency), and
- Mitigation (Elevation) Costs

The calculation is as follows:

$$\begin{array}{l}
 \text{FEMA Damage Assessment (number of structures) * Average Amount of Damage} \\
 + \text{ Resiliency Costs (Avg. \$1,917 per home)} \\
 + \text{ Mitigation Costs (Avg. \$70,000 per “Major” or “Severe” home in the floodplain)} \\
 \hline
 \text{Potential Unmet Need}
 \end{array}$$

#### 5.2.1.1 Renter Calculation

As of July 2016, 502 renters registered with FEMA reporting \$1,070,521 in personal property losses. Based upon the data below renters received \$766,925 in total payments from FEMA and \$216,000 from SBA leaving them with an unmet need of \$87,596.

**Table 19: Renter Occupied Unit Damages and Rebuilding Needs**

Damage	Damaged Structures	Total PP FVL	FEMA Funding	SBA Loan Amt	Unmet Need
Minor-Low	227	\$96,832	\$74,372	\$4,300	\$18,160
Minor-High	49	\$66,610	\$42,682	\$12,900	\$11,028
Major-Low	88	\$178,906	\$109,228	\$57,600	\$12,078
Major-High	83	\$397,886	\$285,472	\$86,900	\$25,513
Severe	55	\$330,287	\$255,170	\$54,300	\$20,817
<b>Total</b>	<b>502</b>	<b>\$1,070,521</b>	<b>\$766,925</b>	<b>\$216,000</b>	<b>\$87,596</b>

Source: FEMA IA, July 2016 & SBA, August 2016

Of the 502 rental properties damaged by the storm, 273 (54.3%) were listed as apartments, and 219 (43.6%) as a House/Duplex. The remaining 2% of units vary by type. FEMA Personal Property Damages (PP FVL) of these renters totaled \$1,070,521. Although FEMA real property damage assessments are not available for rental properties, the methodology detailed above estimates damages at

\$36,954,610. Renters also incurred approximately \$87,596 in unpaid personal property losses.

Again, it is important to note that data currently available for rental properties is extremely limited. Filling these gaps is a significant challenge, which will be resolved during the applicant intake and the Duplication of Benefits (DOB) verification processes.

Total estimated damage for housing, as shown in Table 15, is \$103,654,845 calculated as follows:

Owner Occupied Damage/Unmet Need	\$66,612,639
Renter Occupied Damage/Unmet Need	\$36,954,610
Renter Personal Property Unmet Need	\$87,596
	<hr/>
	\$103,654,845

Based on the best available data, it is estimated that a minimum of 3,219 housing units were damaged during the October 2015 flood. This number includes 2,717 owner-occupied structures and 502 renter occupied units. Ninety-nine percent (99%) of the owner-occupied homes that sustained damage were categorized as a single-family House/Duplex. The remaining 1% were classified as Condos, Mobile Home and "Other." Of the owner-occupied homes, 192 were classified by FEMA as having "Major" or "Severe" damages resulting in \$9,768,666 in total damages.

## 5.2.2 FEMA Damage Assessment

FEMA's Individual Assistance Program (IA) provides important data that helps understand the locations and extent of damages in the City. One of the primary federal sources of recovery assistance, the IA provides damage assessments known as Full Verified Loss (FVL) estimates for eligible households. As of July 2016, 3,219 households had registered for FEMA IA assistance with damages totaling \$9,768,666 in real property verified losses and \$1,986,717.05 in personal property verified losses for a total of \$11,755,383.

While a useful component of the unmet needs analysis, these figures are limited to costs to *repair the home to a safe and sanitary living or functioning condition*. These estimates also do not include residents who did not register for FEMA or those who were denied a damage assessment.

## 5.2.3 NFIP Claims

The National Flood Insurance Program (NFIP) provides additional information regarding locations and extent of damages. As of August 2016, a total of \$13,541,451 had been provided to City of Columbia residents. Due to the concentration of households above 80% AMI with the most severe damages in the floodplain, the City expects that the majority of funding was provided to non-LMI households who could afford to pay NFIP premiums. While the City lacks address level information, it is assumed that the majority of LMI

households located in the floodplain did not have flood insurance and had minimal participation in the housing programs. A Duplication of Benefit Analysis, in accordance with existing City of Columbia procedures, will be performed during the applicant intake process to verify the receipt of any NFIP assistance.

#### 5.2.4 Small Business Administration (SBA) Loans

As previously discussed, SBA loans are another key source of information to estimate unmet needs. Unlike FEMA damage inspections, SBA damage assessments and loans represent the full damage to the home and the amount necessary to fully repair it to pre-storm conditions. For this reason, SBA data are typically used to calculate an average rebuild cost. As of August 2016, SBA had provided \$35,528,500 in low interest loans for 1,220 households in the City of Columbia indicating only 45% of owner occupied households applied FEMA IA assistance. This amount is lower than the SBA verified loss amount of \$53,607,426 because these numbers include “contents” and “mitigation” amounts. Due to the concentration of severely damaged households above 80% AMI in the floodplain, the City believes the majority of funding was provided to non-LMI households who could qualify for a loan. Table 20 below represents all FEMA IA households who received SBA loans regardless of the level of damage that was sustained to their home.

**Table 20: SBA Loan Approval Rates for LMI and Non-LMI Households**

Damage	LMI Households			Non-LMI Households		
	Quantity	Value	Avg. Value	Quantity	Value	Avg. Value
FEMA Repair / Replace	564	\$2,127,536	\$3,772	832	\$3,565,684	\$4,286
SBA Loan	109	\$4,682,400	\$42,958	341	\$13,852,300	\$40,623

Source: FEMA IA, July 2016 & SBA, August 2016

While the amounts of the SBA loans do not vary greatly between the two populations, the percentage of LMI income households that have received an SBA loan is only 19.3% compared to 40.9% of Non-LMI households who have received loans. Therefore, Non-LMI households are twice as likely than LMI households to qualify for and receive SBA assistance.

#### 5.2.5 Special Flood Hazards Area Damage Assessment

An additional source of information for estimating damages is FEMA’s assessment of IA applicants located in the Special Flood Hazards Area (SFHA). Of the 6,558 applicants who applied for IA assistance, 833 of homes damaged by the flood are within the floodplain. Of this number, 114 homes are identified with “Severe” damage (i.e. greater than \$28,800 of real property damage, or determined destroyed, and/or six feet or more of flooding on the first floor). The City estimates \$5,000,000 in FEMA Real Property (RP FVL) damages and an estimated cost to rebuild of approximately \$16 million (using the SBA multiplier).

### 5.2.6 Impacts on Low and Moderate Income Households

HUD requires that a minimum, of 70% of the total CDBG-DR allocation benefit LMI households. LMI limits are determined by HUD annually, based on the Area Median Income of the jurisdiction and are categorized by the number of persons in the family. LMI households are those who earn less than 80% of the community's Area Median Income. For fiscal year 2016 the Columbia MSA the median income defined by HUD is \$64,100. For a family of four, this corresponds to an Extremely Low Income limit of \$24,300, a Very Low Income limit of \$32,050, and a Moderate Income limit of \$51,300. Table 21 illustrates HUD-defined income limits for determining qualified LMI households. It is important to note that these income limits are updated annually and are subject to change.

**Table 21: Low to Moderate Income**

FY 2016 Income Category	Number of Persons							
	1	2	3	4	5	6	7	8
Extremely Low	\$13,500	\$16,020	\$20,160	\$24,300	\$28,440	\$32,580	\$36,730	\$40,890
Very Low	\$22,450	\$25,650	\$28,850	\$32,050	\$34,650	\$37,200	\$39,750	\$42,350
Low	\$35,950	\$41,050	\$46,200	\$51,300	\$55,450	\$59,550	\$63,650	\$67,750

*Source: HUD 2016 Income Limits*

Following a major disaster, households who qualify as either low or moderate income are likely to have increased difficulty securing financing for necessary repairs, replacing damaged personal property, finding suitable rental housing, or paying for temporary housing or relocation expenses. For that reason, the City of Columbia has identified the most heavily damaged areas ("Major" and "Severe" Damages) with concentrations of Low and Moderate income households to prioritize assistance for those with greatest need.

Of the 3,219 applicants who applied for FEMA assistance, 1,725 (53.6%) self-reported their income as low-to-moderate. Of this number, 1,274 were owner occupants and 451 were renter occupied households. In the five communities experiencing the "Major" or "Severe" damages (Lake Katherine, Central Gills Creek, Lower Gills Creek, Wildcat Creek, and Penn Branch) 165 households reported themselves as low to moderate income. This is 45.6% of the most severely impacted households. Table 22 indicates the number of LMI households with the highest concentration of "Major" and "Severe" damage by area.

**Table 22: Major or Severe Damage – LMI Affected Owner & Renter Households**

Damage	LMI Owners	LMI Renters	Owner Percentage	Renter Percentage
Lake Katherine	25	0	100.0%	0.0%
Central Gills Creek	11	10	81.4%	18.6%
Wildcat Creek	8	8	74.4%	25.6%
Lower Gills Creek	6	78	21.0%	79.0%
Penn Branch	7	12	57.5%	42.5%
<b>Total</b>	<b>57</b>	<b>108</b>	<b>63.0%</b>	<b>37.0%</b>

Source: FEMA IA, July 2016 &amp; SBA, August 2016

### 5.2.7 Housing Types Impacted

As shown in Table 23, the majority of flood related damages were owner occupied single family homes or duplexes, which sustained \$9,698,451 in real property damages and \$887,229 in personal property damages totaling \$10,585,680 in losses according to FEMA IHA data. Condo damages, both real and personal property, totaled \$95,234. Mobile home and a unit classified as “Other” damages totaled less than \$5,000.

Damages to rental properties are assessed in terms of personal property losses to tenants. As can be seen in Table 24, the majority of personal property losses were reported for apartment units with \$710,122 in damages. Single family homes or duplexes used as rental units reported the second highest personal property losses with \$352,177.79 in damages. A total of \$1,070,521 in personal property losses were reported for renter occupied households.

**Table 23: Owner Occupied Damages**

Structure Type	Properties	Real Property Damage	Personal Property Damage	Total Property Damage
Apartment	0	\$0	\$0	\$0
Assisted Living Facility	0	\$0	\$0	\$0
Boat	0	\$0	\$0	\$0
College Dorm	0	\$0	\$0	\$0
Condo	22	\$66,834	\$28,401	\$95,234
House/Duplex	2,691	\$9,698,451	\$887,229	\$10,585,681
Military Housing	0	\$0	\$0	\$0
Mobile Home	3	\$1,923	\$290	\$2,213
Other	1	\$1,458	\$276	\$1,734
Townhouse	0	\$0	\$0	\$0
<b>Total</b>	<b>2,717</b>	<b>\$9,768,666</b>	<b>\$916,196</b>	<b>\$10,684,862</b>

Source: FEMA IA



**Table 24: Renter Occupied Damages**

Structure Type	Properties	Real Property Damage	Personal Property Damage	Total Property Damage
Apartment	273	\$0	\$710,122	\$710,122
Assisted Living Facility	1	\$0	\$1,429	\$1,429
Boat	0	\$0	\$0	\$0
College Dorm	1	\$0	\$500	\$500
Condo	5	\$0	\$3,723	\$3,723
House/Duplex	219	\$0	\$352,178	\$352,178
Military Housing	1	\$0	\$145	\$145
Mobile Home	1	\$0	\$402	\$402
Other	1	\$0	\$2,021	\$2,021
Townhouse	0	\$0	\$0	\$0
<b>Total</b>	<b>502</b>	<b>\$0</b>	<b>\$1,070,521</b>	<b>\$1,070,521</b>

Source: FEMA IA

### 5.2.8 Owner vs. Renter

FEMA registrations provide insight into the proportions of each occupancy type affected by the October 2015 flooding. Of the 3,219 homes with FEMA verified damages, 2,717 (84.4%) were owner occupied and 502 (15.6%) were renter occupied. According to these figures, the vast majority of damaged homes are owner occupied. However, as discussed previously, these figures account only for homes registered for FEMA assistance, and do not accurately represent the full universe of damaged homes. Table 25 further breaks down these numbers by the areas most affected by the flooding.

**Table 25: Major or Severe Damage – LMI Affected Owner & Renter Households**

Location	Owner Households			Renter Households			Total Households		
	LMI	Total	LMI %	LMI	Total	LMI %	LMI	Total	LMI %
Lake Katherine	25	94	26.6%	0	0	0.0%	25	94	26.6%
Central Gills Creek	11	57	19.3%	10	13	76.9%	21	70	30.0%
Wildcat Creek	8	29	27.6%	8	10	80.0%	16	39	41.0%
Lower Gills Creek	6	25	24.0%	78	94	83.0%	84	119	70.6%
Penn Branch	7	23	30.4%	12	17	70.6%	19	40	47.5%
<b>Total</b>	<b>57</b>	<b>228</b>	<b>25.0%</b>	<b>108</b>	<b>134</b>	<b>80.6%</b>	<b>165</b>	<b>361</b>	<b>45.6%</b>

Source: FEMA IA, July 2016 &amp; SBA, August 2016

Table 25 indicates that 361 out of 362 households are located in areas that sustained “Major” and “Severe” damages. Of this number, 228 (63%) are owner occupied households and 134 (37%) are renter occupied households. According to FEMA damage assessments, owners sustained \$7 million in damages. Using the SBA data, which more closely reflects actual damages the total damages to owner occupied units is estimated to total more than \$11 million.

The City’s renter-occupied units comprise approximately 54% of housing inventory. However, only 37% of renter-occupied units reported damages. It is possible that damaged renter-occupied units are under reported.

According to the City of Columbia 2015-2019 CDBG Consolidated Plan, the need for additional affordable rental housing existed prior to the storm and flood events of 2015. When combined with this pre-existing shortage of affordable rental housing, damages to the City rental stock places enormous strain on low and moderate income residents looking for safe, reasonably priced rental housing.

### 5.3 Infrastructure

In order to assess unmet infrastructure needs for CDBG-DR funding, the city developed damage assessments and engineering estimates in order to participate in FEMA’s Public Assistance (PA) program. The following table illustrates how those damages are documented and categorized.

**Table 26: FEMA PA Categories**

Category	Definition	Total Damages	25% Cost Share
A	<i>Debris Removal</i>	\$585,109	\$146,277
B	<i>Emergency Protective Measures</i>	\$8,263,554	\$2,065,888
C	<i>Road Systems and Bridges</i>	\$1,306,878	\$326,719
D	<i>Water Control Facilities</i>	\$77,447,170	\$19,361,793
E	<i>Public Buildings and Contents</i>	\$288,151	\$72,038
F	<i>Public Utilities</i>	\$8,797,049	\$2,199,262
G	<i>Parks, Recreational and Other Items</i>	\$154,110	\$38,528
<b>Total</b>		<b>\$96,842,021</b>	<b>\$24,210,505</b>

*Source: City of Columbia, November 2016*

Based on these categories, the city identified its highest level of need in Category D *Water Control Facilities* due to the breach of the Columbia Canal. This breach resulted in a 60-foot section of the canal washing away which caused the water level of the canal to drop below the level necessary for the city to pump water into its water treatment facility through normal operations.

As of July 2016, the long-term mitigation cost to restore the canal to its pre-flood condition is estimated to be between \$40 and \$50 million. Additional mitigation efforts to reinforce the levee and construct a permanent bypass pumping system to pull water from the nearby rivers are

estimated to be an additional \$50.0 million dollars. These estimates do not include the almost \$10 million in emergency repairs listed in Category B.

Category F *Public Facilities* reflects \$8.79 million in repairs to the city's wastewater system to address damages to sewer lift stations and sewer lines. Additionally, \$1.5 million was included to repair the city's hydroelectric plant but this was not identified as a priority as no water can reach the station until the Columbia Canal breaches are repaired.

The third highest infrastructure need, Category B *Emergency Protective Measures*, includes the building of a coffer dam as well as bypass pumps and pipes to serve as an access to an alternate water supply for the Water Treatment Facility. These infrastructure improvements are estimated at more than \$8.26 million.

The fourth ranked infrastructure need, an estimated \$1.5 million in repairs for roads and Lost Creek Bridge (Category C), \$0.5 million for debris removal (Category A), and \$0.3 million for the restoration of 10 city parks (Category G) have been identified for FEMA PA funding.

In addition to the categories listed above Category E *Public Buildings and Contents*, is an estimated \$288,151 million in repairs of city buildings, the hydroelectric plant and the wastewater system. This amount is expected to assist with repairs for several buildings that had water damage with the largest building loss being the fire station that was completely submerged by water. Funding is also needed to repair or replace fire and police equipment that was lost or damaged in the flood waters.

As shown in Table 26, the estimated total amount of infrastructure repairs for the City of Columbia is almost \$97 million. Of this amount, the city is responsible for a 25% cost share of approximately \$24 million. The South Carolina State Legislature has ratified the General Appropriations Bill for Fiscal Year 2016-2017 (H. 5001). Pursuant to §118.16(B)(3) of this bill, the South Carolina Emergency Management Division (SCEMD) will be authorized to make payments of the non-Federal share of Public Assistance Project Worksheets awarded under FEMA-4241-DR-SC (Severe Storms and Flooding) up to 25% match threshold. The City of Columbia, along with Richland and Lexington Counties, will share in this fund. Since damage estimates have increased, the City expects that the State may only be able to contribute 20-21%, leaving the City to fund the remaining 4-5% of the required match.

When funds are available, projected to be in October 2016, SCEMD will begin processing payments for the non-Federal share of approved and obligated projects. For small projects (less than \$121,800), SCEMD will pay the approved non-Federal share of the eligible project amount. For large projects (\$121,800 and above), SCEMD will pay the non-Federal share of up to 25% of approved, eligible project expenditures. As of July 2016, \$72 million in state funds has been allocated to cover the local match. As such, this allocated amount should cover 100% of the city's required match, freeing the city from an unmet infrastructure need related to FEMA's match requirements.

Although a portion of the cost share for FEMA PA projects will be paid by state funds, the City of Columbia fully recognizes that there are unmet needs beyond the cost share requirement that will not be covered due to the state's limited appropriation of FEMA PA funding. Unfortunately, the

amount and types of projects to be funded by the state's FEMA allocation is not known as of September 2016. In the event that CDBG-DR funds are necessary to complete these type of activities, the city will submit a substantial Action Plan Amendment for HUD's review and approval.

#### **5.4 Unmet Economic Development Needs**

The extensive rainfall and flooding of early October 2015 severely damaged Columbia businesses. Many experienced damages to their facilities, stock, and equipment and some businesses were totally destroyed. Even businesses that did not have physical damage from the storms were closed for an extended period causing significant losses in revenue. These damages are outlined in *Action Plan Section 4 Economic Development Losses*.

As of December 2016, the Small Business Administration had approved more than 200 disaster assistance loans for businesses totaling more than \$24.5 million which is an increase from 165 loans approved at the time of the initial unmet needs assessment. As a result, the City of Columbia Office of Business Opportunities (OBO) offered low-interest loans of up to \$10,000 to assist small businesses impacted by the fund. OBO approved 9 loans for a total of \$85,000 in 2016 out of a total of \$100,000 available to lend. However, there are unmet needs that require additional assistance. Many businesses have not qualified for financing through FEMA, SBA, OBO or other lenders and are still feeling the effects of lost revenue from the impact of the flood. In order to address these needs, the proposed Small Business Recovery (SBR) Program is expected to provide sustainability to local small businesses and job retention and economic revitalization to commercial corridors effected by the storms and resulting flood.

#### **5.5 Columbia Housing Authority Unmet Need Assessment**

As stated in Action Plan Section 5, the Columbia Housing Authority (CHA) was extensively consulted on the development of the Action Plan. Based upon CHA assessment, no additional funding is necessary for the recovery of CHA properties as insurance proceeds covered the damages. This has been confirmed by the Columbia Housing Authority.

#### **5.6 Transitional Housing, Emergency Sheltering, and Homelessness**

As stated in Action Plan Section 5, there were no disaster impacts to Transitional Housing, Emergency Sheltering, and Homeless Facilities including McKinney-Vento funded shelters; there is no unmet need related to public service activities. This has been confirmed by the United Way.

## 6.0 CDBG-DR Programs

### 6.1 Program Descriptions

#### **Columbia Homeowner Assistance Program (CHAP)**

**Program Eligible Activity:** Rehabilitation - Housing, 24 CFR 570.202, 24 CFR 570.201 (d), 24 CFR 570.605

**National Objective:** Low- and Moderate-Income Benefit

**Activity Allocation:** \$3,336,150

#### **Overview and Delivery**

The proposed Columbia Homeowner Assistance Program (CHAP) will be administered by the city's Community Development Department. The program will provide up to \$150,000 to assist owner-occupied households with "Major-High" and "Severe" damages directly related to the October 2015 rain and flood event for properties with unmet needs exceeding \$25,000. The program will also provide assistance to meet elevation requirements where required. Only LMI households will be assisted.

In order to leverage limited CDBG-DR funding, homeowners eligible to participate in FEMA's Increased Cost of Compliance (ICC) program, must apply for and receive this funding if elevation of the rehabilitated structure is necessary. Assistance for reconstruction of substantially damaged owner-occupied dwellings will also be provided. In all cases, sufficient federal and non-federal resources must be available to complete rehabilitation and reconstruction projects to HUD and city building code requirements.

Funding for this program will be capped at \$150,000 unless rehabilitation of the flood damaged structure requires additional work to specifically address compliance with city building code and floodplain ordinance requirements. Consideration will also be given for additional work related to environmental remediation and/or Green Building requirements when necessary. In addition, funding for the costs of initial homeowner hazard insurance premiums, as well as flood insurance premiums (for properties covered by the Flood Disaster Protection Act of 1973 as amended, pursuant to §570.605) will be covered for a period of one year.

#### **Connection to Disaster and Unmet Needs**

CHAP was developed to specifically address all 76 low to moderate income single family households identified by FEMA as sustaining "Major" or "Severe" damages as a result of the flood. While elderly, disabled, and female headed households will be prioritized for participation in the program, 100% of all identified LMI households will be given the opportunity to receive assistance.

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the City of Columbia's long-term recovery strategy. Based on damage assessments and remaining housing needs cited in this Action Plan, the city has determined that single family owner-occupied or rental dwellings suffered the greatest damage from the declared disaster. Home repairs and improvements funded through this program will be designed to minimize the impact of future storms and floods. By addressing the most critical unmet housing needs and encouraging high-quality, disaster resistant construction, the city improves the long-term safety and stability of its community. These home repairs also help stabilize damaged neighborhoods,

retain consumers for local businesses, preserve the local tax base, and encourage new investment.

### **Eligible Applicants**

Eligibility requirements for participants in this program are as follows:

- Damaged residential dwelling must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained Major-High or Severe damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium.
- Application for and receipt of ICC funding for elevation, if required.
- Sufficient gap financing if required.

### **Ineligible Applicants**

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than two units or rental properties.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects in accordance with city building code and floodplain requirements.
- Applicants who were not classified by FEMA with Major-High or Severe damages.
- Ineligible structure type.

### **Prioritization of Applicants**

The City's most important goal is to assist LMI owner-occupied households with the most severe damage. Among those, priority will be given to elderly, female head of household, and disabled applicants.

### **Use of Funds**

CDBG-DR funds will be provided in the form of a direct grant agreement between the city and the applicant and through a construction agreement between the applicant and the selected contractor. The grant agreement will include obligations to: 1) authorize payments directly to the contractor responsible for executing rehabilitation, elevation and/or reconstruction work; 2) own and occupy the damaged dwelling as a primary residence for a period of one (1) year after the completion of repairs and issuance of a "Certificate of Occupancy"; and, 3) maintenance of flood insurance in perpetuity, if applicable. Execution of a program covenant memorializing the flood insurance requirement will also be required

Requests for funds beyond the \$150,000 cap will be considered for work that specifically addresses compliance with city building code and floodplain ordinances and to meet environmental remediation requirements and Green Building standards. The costs of initial homeowner hazard insurance premiums, as well as flood insurance premiums (for properties covered by the Flood Disaster Protection Act of 1973 as amended, pursuant to §570.605) will be covered for a period of one year.



**Monitoring**

Monitoring of program compliance will be performed by city's Community Development Office in accordance with the CHAP executed grant agreements, covenant requirements, and the City of Columbia CDBG-DR Monitoring Plan.

**Start and End Date**

January 2017 – December 2020 (See Exhibit C for Detailed Expenditure and Performance Projections as stipulated in Federal Register Notice and on the HUD website).

**Columbia Buyout Program (CBP)**

**Program Eligible Activity:** Acquisition and Disposition, 24 CFR 570.207, 24 CFR 570.504

**National Objective:** Low to Moderate Income - Housing Benefit, Urgent Need, Elimination of Slums and Blight

**Activity Allocation:** \$2,000,000

**Overview and Delivery**

The proposed City of Columbia Buyout Program (CBP) will be administered by the city's Community Development Department. This voluntary program seeks to reduce the risk from future flooding by purchasing contiguous residential properties located in the floodway or floodplain that sustained "Major-High" or "Severe" damages. LMI owner-occupants and owners of rental properties where damages pose a health or safety hazard will receive top priority for funding. The purchase price of these properties will be based upon pre-disaster Fair Market Value (FMV). All residential properties acquired will be demolished and dedicated in perpetuity to a public use that is compatible with open space, recreation, natural floodplain functions, ecosystem restoration, or wetlands management practices. Program funds will also be used for property disposition costs, as necessary.

**Connection to Disaster and Unmet Needs**

Severely damaged homes, particularly in SFHA, are a health and safety risk to the community. The City recognizes that the loss of rental units is significant as the city has a limited amount of affordable housing making it more difficult for renters to adapt to post-flooding conditions. By encouraging homeowners and landlords with damaged units in the flood plain, where there is a high risk of additional disasters, to participate in this Buyout program, the city is reducing the impact of future disasters and encouraging resettlement in one of its nine areas targeted for revitalization and redevelopment, thus extending its long-term vision for a healthy, vital community.

The Buyout program was developed to address approximately 38 households that have requested city buyout of their damaged property as a result of the October 2015 flood.

**Eligible Applicants**

Eligibility requirements for participants in this program are as follows:

- Damaged owner occupied or rental dwelling must be located within Columbia City Limits in a designated floodway or floodplain.

- Applicants must have owned the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained Major-High or Severe damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium.

**Ineligible Applicants**

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Applicants who were not classified by FEMA with Major-High or Severe damages.
- Ineligible structure type.

**Prioritization of Applicants**

LMI owner-occupants and owners of rental properties where damages pose a health or safety hazard will receive top priority for funding. The voluntary purchase of contiguous properties may also be considered in order to reduce risk of future flooding in designated areas with a high concentration of owner participation in the program. Finally, awards will be made as applications are completed and determined to be eligible for funding, giving priority to elderly, disabled, and female headed households with children.

**Use of Funds**

The City of Columbia proposes to use CDBG DR funds to buy severely damaged residential properties within the floodway or floodplain with the intent to demolish the structures and create park amenities, open space, or flood storage/overflow areas. CDBG-DR funds will be provided in the form of direct assistance to owners who voluntarily participate in the program. Owners will be paid pre-disaster Fair Market Value of the damaged residential dwelling as determined by a primary and review appraiser. Relocation assistance will be provided to any tenants permanently displaced by the buyout.

**Monitoring**

Monitoring of program compliance will be performed by city's Community Development Office in accordance with the City of Columbia CDBG-DR Monitoring Plan, covenant and reuse requirements/limitations.

**Start and End Date**

January 2017 – December 2021 (See Exhibit C for Detailed Expenditure and Performance Projections as stipulated in Federal Register Notice and on HUD's website).

**Columbia Small Rental Repair Program (SRRP)****Program Eligible Activity:** Rehabilitation – Housing, 24 CFR 570.202, 24 CFR 507.201**National Objective:** Low- and Moderate-Income Benefit**Activity Allocation:** \$6,565,270**Overview and Delivery**

The proposed City of Columbia Small Rental Repair Program (SRRP) will be administered by the city's Community Development Department. The program will provide funding to assist with the repair of storm damaged rental properties located outside of the floodplain. The primary goals of SRRP are to assist property owners who agree to rent to LMI individuals and families at affordable rates in repairing and reconstructing storm damaged rental units. This program will also provide displaced rental households – including those not registered but who can provide evidence of storm damage - with affordable housing opportunities within the City of Columbia. Owners of rental properties not damaged in the storm of October 2015 will be redirected to other City programs such as the Property Enhancement Assistance for Rental Housing (PEAR) program. Funding for this program will be capped at \$150,000 per unit unless rehabilitation of the flood damaged structure requires additional work to specifically address compliance with city building code and floodplain ordinance. Consideration will also be given for additional work related to environmental remediation and/or Green Building requirements when necessary.

As a requirement to receive CDBG-DR assistance, rental property owners must agree to make rehabilitated rental properties available to existing or displaced LMI households first before assisting other LMI rental households. Rental property owners will be required to sign a grant agreement requiring that all rehabilitated units remain affordable for a period of three (3) years. For the purpose of the SRRP, small rental properties are those with one to four rental units, which include single family, duplex, triplex, and quadraplex buildings on one tax parcel. The rent for an affordable rental unit will be calculated based on the income level of the tenant and the size of the rental unit which should be between 50-80% of the local Fair Market Rate. Rental complexes with four units designated as a “substantially rehabilitated building” will be provided with broadband infrastructure. The city also intends to provide temporary relocation assistance to tenants temporarily displaced by rehabilitation activities.

**Connection to Disaster and Unmet Needs**

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the City of Columbia's long-term recovery strategy. Based on damage assessments and remaining housing needs cited in this Action Plan, the city has determined that single family owner-occupied or rental dwellings suffered the greatest damage from the declared disaster. Home repairs and improvements funded through this program will be designed to minimize the impact of future storms and floods. By addressing the most critical unmet housing needs and encouraging high-quality, disaster resistant construction, the city improves the long-term safety and stability of its community. These home repairs also help stabilize damaged neighborhoods, retain consumers for local businesses, preserve the local tax base, and encourage new investment.

As currently budgeted, 31.3% of CDBG-DR funding has been allocated for the Small Rental Repair Program (SRRP) which was specifically developed to address all 193 LMI occupied rental properties that sustained “Major” or “Severe” damages as a result of the flood. In addition, SRRP

was designed to increase affordable housing opportunities for LMI households for a period of three (3) years.

**Eligible Applicants**

Eligibility requirements for participants in this program are as follows:

- Rental property must be located within Columbia City Limits.
- Applicants must have owned the damaged rental property as of and prior to the date of the storm event (October 2015).
- Damaged rental structure should have no more than 4 units.
- Sufficient gap financing if required.

**Ineligible Applicants**

Ineligibility criteria for this program is as follows:

- Rental units located outside of Columbia city limits.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects, if necessary.
- Ineligible structure type.

**Prioritization of Applicants**

Damaged rental properties occupied at the time of the storm located outside of the floodplain will be given first priority. Existing rental properties not damaged by the storm will not be eligible, but owners will be referred to other City programs for assistance. Tenants displaced by the storm will be given first priority for participation with elderly, disabled, or female headed households prioritized for placement in restored units. The City projects 193 households will be assisted.

**Use of Funds**

Rehabilitation funds will be made available to property owners in the form of a no interest, no payment, forgivable loan requiring property owners to: 1) rent rehabilitated properties to renters whose incomes are below or at 80% AMI, 2) maintain affordable rent levels for three (3) years and 3) maintenance of flood insurance in perpetuity, if applicable. Funds will be provided in the form of a direct forgivable deferred loan agreement between the city and the property owner and through a construction agreement between the applicant and the selected contractor. Within 30 days of occupancy or re-occupancy of the rehabilitated rental property, the property owner will be required to provide the city with a copy of the executed lease as well as tenant income and demographic information. This information shall be provided annually to the city as property leases are renewed in order to monitor the program's affordability requirements.

**Monitoring**

Monitoring of program compliance will be performed by city's Community Development Office in accordance with the SRRP executed grant agreements, covenant requirements, and the City of Columbia CDBG-DR Monitoring Plan.

**Start and End Date**

January 2017 – December 2022 (See Exhibit C for Detailed Expenditure and Performance Projections).

**City of Columbia Elevation Reimbursement Program (ERP)**

**Eligible Activity:** Rehabilitation – Housing, 24 CFR 570.202,  
24 CFR 507.201

**National Objective:** Low- and Moderate-Income Benefit, Urgent Need

**Activity Allocation:** \$3,490,000

**Overview and Delivery**

Given constrained recovery resources and identified housing needs, the city is providing limited elevation reimbursement to owner-occupied households who initiated their recovery prior to the one-year anniversary of the flood. The city recognizes that owners of “severely” damaged homes have incurred significant repair and reconstruction costs due to newly adopted elevation requirements and is committed to offsetting increased recovery costs for homeowners who were required to rebuild more resilient homes in order to prevent future losses. Regardless of income, eligible owner-occupants who have initiated elevation of their damaged structure in accordance with City of Columbia floodplain requirements will be provided up to \$20,000 in reimbursement of CDBG-DR funding. It is envisioned that this funding coupled with \$30,000 in ICC funding will relieve some of the recovery burdens for households in the most impacted areas of the city.

**Connection to Disaster and Unmet Needs**

The most severe damages from the October 2015 Flood occurred in Special Flood Hazard Areas that are required by Ordinance No. 2015-046 to meet minimum FEMA standards for floodplain management. By elevating structures above the Base Flood Elevation, the City seeks to protect human life and health while minimizing public expenditures for costly flood control projects, the need for rescue and relief efforts, prolonged business interruptions; and damage to public facilities and utilities located in floodplains.

As described in the Housing Damage Assessment of this Action Plan, the most severely damaged households are concentrated in Special Hazard Flood Areas along Columbia’s waterways. By encouraging home elevation, the City is mitigating the impact of future disasters. Of the 6,558 households that received a FEMA damage assessment, a total of 205 sustained “Severe”, “Major-High”, and “Major-Low” damages.

The current allocation of almost \$3.49 million for elevation reimbursement will enable approximately 175 households to receive \$20,000 in reimbursement for elevation of their homes in order to offset costs to meet elevation requirements. As of August 2016, there were 21 households in the city who have expressed interest in home elevation.

**Eligible Applicants**

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained “Severe” damages.
- Damaged residence must be a single-unit structure.

- If applicable, applicants must have applied for FEMA Increased Cost of Compliance (ICC) funding for elevation of their damaged structure.
- Elevation projects started after the one year anniversary of the flood must receive Tier II environmental clearance prior to initiating elevation work.
- Elevation of the home is required by the city's floodplain ordinance and must be at least 50% complete prior to the issuance of reimbursement.

**Ineligible Applicants**

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than one unit or rental properties.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects.
- Applicants who are not classified by FEMA with "Severe" damages or required to elevate in accordance with the city's floodplain ordinance.
- Ineligible structure type.

**Prioritization of Applicants**

Applications for assistance from LMI, elderly, disabled, and female headed households with children will be prioritized for assistance. As of October 2016, 22 households had expressed interest in an elevation program.

**Use of Funds**

Delivery of funds will be provided in the form of a direct grant agreement between the city and the applicant. The grant agreement will include obligations for: 1) ownership and occupancy of the primary residence home for not less than one (1) year after reimbursement, and 2) maintenance of flood insurance in perpetuity on the damaged home as required. For movable housing units, the flood insurance must be maintained at any point that the unit is located in an area requiring flood insurance. Execution of a program covenant memorializing the flood insurance requirement will also be required for homes in located in designated flood plain areas.

**Monitoring**

Monitoring of program compliance will be performed by city's Community Development Office in accordance with the ERP executed grant agreements, covenant requirements, and the City of Columbia CDBG-DR Monitoring Plan.

**Start and End Date**

January 2017 – December 2018 (See Exhibit C for Detailed Expenditure and Performance Projections).



**City of Columbia Minor Repair Program (MRP)**

**Eligible Activity:** Rehabilitation – Housing, 24 CFR 570.202, 24 CFR 507.201

**National Objective:** Low- and Moderate-Income Benefit

**Activity Allocation:** \$3,398,680 (\$2,398,680 in CDBG-DR funds, \$1,000,000 CDBG Entitlement Funds)

**Overview and Delivery**

The proposed City of Columbia Minor Repair Program (MRP) will be administered by the city's Community Development Department. The program will make funding available to assist low-to-moderate income owner-occupied households that sustained Minor-Low and Minor-High damages who have remaining repair needs not covered by the FEMA IA Program and SBA. Funding up to \$25,000 will address rain/flood damages as well as lead based paint, asbestos, and other repairs necessary to bring LMI dwellings up to the Columbia Property Maintenance Code and ensure that these housing units are more resilient to future natural hazards. Elderly and disabled applicants will be given priority for assistance.

**Connection to Disaster and Unmet Needs**

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the City of Columbia's long-term recovery strategy. By addressing the most critical unmet housing needs and encouraging high-quality, disaster resistant construction, the city improves the long-term safety and stability of its community and minimizes the impact of future storms and floods. These home repairs also help stabilize damaged neighborhoods, retain consumers for local businesses, preserve the local tax base, and encourage new investment.

Based on damage assessments and remaining housing needs cited in this Action Plan, the city has determined that single family owner-occupied dwellings suffered the greatest damage from the 2015 Flood. Home repairs and improvements funded through this program will be designed to assist those low-income households not eligible for the City's Buyout and Homeowner Assistance Programs, which focus on homes with major to severe damages and to those inside the floodplain. Ninety four percent (94%) of low income owner occupied households, suffered minor to moderate damage and may not be eligible for those programs. As this group may be less likely to register with FEMA, the need is probably much greater than anticipated.

MRP was developed to provide an opportunity for limited home repairs for all 1,198 low to moderate income households residing in single family homes identified by FEMA as sustaining "Minor Low" and "Minor High" damages. Due to limited funding, elderly, disabled, and female headed households will be prioritized for participation in the program. This program will enable households with limited resources to receive assistance with completing their repairs.

**Eligible Applicants**

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained Minor-High and Minor-Low damages.

- Damaged residence must be a single-unit structure, duplex, townhome, or condominium with less than \$25,000 in damages.
- Applicants must be below 80% AMI at application intake.

**Ineligible Applicants**

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than two units or rental properties.
- Non-LMI households.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects.
- Ineligible structure type.

**Prioritization of Applicants**

Elderly, disabled, and female headed households with children households will be given first priority for participation in MRP. Remaining applications for assistance by LMI households will be processed in the order that they are completed and determined to be eligible. The City expects to assist 1,198 households through this program

**Use of Funds**

Delivery of funds will be provided in the form of a direct grant agreement between the city and the applicant and through a construction agreement between the applicant and the selected contractor. The grant agreement will include obligations to: 1) authorize payments directly to the contractor responsible for executing repair work orders; 2) ownership and occupancy of the home for not less than one (1) year after the completion of repairs and issuance of a "Certificate of Occupancy"; and, 3) maintenance of flood insurance in perpetuity on the damaged home, if required. For movable housing units, the flood insurance must be maintained at any point that the unit is located in an area requiring flood insurance. Execution of a program covenant memorializing the flood insurance requirement will also be required for homes in located in designated flood plain areas.

**Monitoring**

Monitoring of program compliance will be performed by city's Community Development Office in accordance with the MRP executed grant agreements, covenant requirements, and the City of Columbia CDBG-DR Monitoring Plan.

**Start and End Date**

January – 2017-December 2021 (See Exhibit C for Detailed Expenditure and Performance Projections).

**City of Columbia Small Business Disaster Recovery Program****Eligible Activity:** Special Economic Development, 24 CFR 570.203**National Objective:** Low to Moderate Income Benefit**Activity Allocation:** \$200,000**Overview and Delivery**

The Small Business Disaster Recovery (SBDR) Program will provide financial assistance in the form of forgivable loans up to \$20,000 to businesses affected by the October 2015 Flood that continue to experience challenges to their recovery. Applicants may use funds for working capital, inventory, furnishings and equipment, and cleanup and repair. Loans will be forgiven over a period of 3 years with 33.3% forgiven each year on the anniversary of the loan closing. All forgivable loans require a personal guarantee from the borrower. While the forgivable loan is outstanding, the borrower agrees to supply the lender, office of Business Opportunities, with annual proof of good standing:

- Copy of valid business license
- Current paid property tax receipt showing no balance
- Current property and liability insurance for premises
- Copy of most recent water and sewer bill showing no balance
- Job retention/creation tracking form

The total CDBG funding available is \$200,000. Applicants are eligible for forgivable loans up to \$20,000.00 that may be used for:

- Working capital
- Inventory
- Furnishings and equipment
- Cleanup and repair
- Loans will be forgiven over a period of 3 years with 33.3% forgiven each year on the anniversary of the loan closing

The forgivable loan shall be considered in default and repaid only if the Borrower closes, sells or has a significant change in ownership for any reason, to include foreclosure and/or any other legal action, prior to the three-year maturity date. In addition, the owner will be in default if low-to-moderate income jobs are not documented or reported in compliance with the program grant agreement. If default occurs, Borrower will be issued a notice by the Lender requesting immediate repayment of the pro-rated amount remaining on the forgivable loan. Otherwise, this loan is a forgivable loan after a three (3) year period with one-third of the principle being forgiven each year.

**Connection to Disaster and Unmet Need**

The extensive rainfall and flooding of early October 2015 severely damaged Columbia businesses. Many experienced damages to their facilities, stock, and equipment and some businesses were totally destroyed. Even businesses that did not have physical damage from the storms were closed for an extended period causing significant losses in revenue.

The SBDR is expected to provide sustainability to local small businesses and job retention and economic revitalization to commercial corridors affected by the storms and resulting flood.

**Eligible Applicants**

Eligibility requirements for participants in this program are as follows:

- Businesses must be located in the City of Columbia.
- Businesses must have applied to FEMA or SBA for disaster assistance. These funds may be used by those who were denied funding by FEMA or SBA or used as gap financing for those who have needs in excess of the amount received from other sources.
- Businesses must have disaster losses not covered by any other insurance.
- Applicants must qualify as a Small Business with less than 50 employees as defined by the City.
- Business Owners must have owned and operated the business as of and prior to the date of the storm event (October, 2015).
- Priority will be given to businesses located in the most impacted areas as defined by the City of Columbia.
- Businesses must provide financial statements, tax returns or other documentation at the request of the City of Columbia to demonstrate continuing unmet need.

**Ineligible Applicants**

Ineligibility criteria for this program is as follows:

- Businesses located outside of Columbia city limits.
- Business started after the October 2015 flood event.
- Businesses that have not applied for FEMA or SBA assistance.
- Businesses with more than 50 employees.

**Prioritization of Applicants**

Applicants will be considered on a first come, first serve basis determined by the date on which the City receives a completed application. In evaluating applications, priority will be given to those businesses located in the most impacted areas as defined by the City of Columbia.

**Use of Funds**

The Small Business Disaster Recovery (SBDR) Program will provide forgivable loans up to \$20,000 to businesses affected by the October 2015 Flood that continue to experience challenges to their recovery. Applicants may use funds for working capital, inventory, furnishings and equipment, payroll and cleanup and repair. Loans will be forgiven over a period of 3 years with 33.3% forgiven each year on the anniversary of the loan closing. All forgivable loans require a personal guarantee from the borrower.

**Monitoring**

Monitoring of program compliance will be performed by city's Community Development Office in accordance with the EDP Office of Business Opportunities (OBO) executed loan agreements and the City of Columbia CDBG-DR Monitoring Plan.

**Start and End Date**

January 2017-December 2021 (See Exhibit C for Detailed Expenditure and Performance Projections).

## 6.2 Planning and Coordination

### 6.2.1 Sound, Sustainable, Long Term Recovery Planning

The Comprehensive Plan for Columbia, South Carolina: 2015 – 2019 promotes sustainable, environmentally friendly development and establishes standards and regulations to guide future land use and improve floodplain management techniques. Citizens, neighborhood and focus group participants, and city staff developed policies and objectives to guide future land use in the City of Columbia. Specifically, the Plan seeks to:

- Promote Low Impact Development (LID) practices such as swales and rain gardens and institute improved storm water engineering practices;
- Protect natural water drainage by planting buffer areas around water courses, helping protect residential property from potential flood damage
- Promote the use of pervious parking surfaces, as well as infill development and land conservation (high density development with more open space) to reduce the costs for storm water management and retention and allow excess water to percolate through the ground during times of hard rain or flooding
- Assess and update the current 100 Year flood boundaries to prevent further development into flood-prone areas and better ensure the safety of all residents, preventing loss of property and life in the event of future disasters;
- Develop special zoning and/or overlays to encourage LID/cluster zones to protect and preserve sensitive environmental areas;
- Decentralize community services and facilities to ensure more neighborhoods have access to essential goods and services during emergencies.

By achieving the goals and objectives identified in the Comprehensive Plan, initiating stronger, more energy efficient building codes, and requiring both residential and non-residential structures be built at least two feet above the new Advisory Base Flood Elevation (ABFE), the City of Columbia guarantees a more successful long term disaster recovery, thus ensuring a strong, healthy environment and the safety and welfare of Columbia's citizens. These sustainable and resilient building standards are more specifically outlined in the "Construction Standards", "Elevation//Disaster Resistant Construction" and "Mitigation and Resiliency" sections of the Action Plan.

### 6.2.2 Local and Regional Coordination

The City of Columbia has created a multi-departmental work group that is providing oversight of the City's flood recovery process. The Community Development Department, which is responsible for managing and monitoring all CDBG-DR programs, meets monthly with the work group to ensure effective coordination between departments and divisions, between the city and sub-recipients responsible for program implementation, and with other local and regional planning efforts to ensure program consistency.

The City of Columbia is coordinating its flood recovery efforts with the South Carolina Disaster Recovery Office, Richland County, and Lexington County to ensure uniformity and compatibility of recovery data, duplication of benefit calculations, the environmental review process, and program design. These coordinated efforts will help effectively

manage the expectations of program applicants and minimize confusion about disaster recovery services and benefits. The following key groups bring a wealth of knowledge and resources to the disaster recovery planning process and continue to be essential partners in building long-term community resilience against future storms. These include the following, among others:

- Richland-Lexington Long Term Recovery Group
- Richland County Disaster Recovery Group
- Midlands Flood Recovery Advisory Group
- Columbia Housing Authority
- Midlands Area Consortium for the Homeless
- Midlands Housing Trust Fund
- University of South Carolina
- United Way of Midlands
- Salvation Army
- American Red Cross

## **6.3 Leveraging Funds**

### **6.3.1 Overview**

To maximize the impact of the City's CDBG-DR funding, and as part of a continuous effort to prevent duplication of benefits, there will be an ongoing commitment to identify and leverage other federal and non-federal funding sources. Further, the city will build upon existing relationships and strive to create new partnerships with other federal and state agencies, corporations, foundations, nonprofits, and other stakeholders as a means of maximizing all viable funding sources.

CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources, including FEMA and the SBA. It should be noted that FEMA HMGP is a highly competitive, statewide program with limited funding (\$36.6 million), and very long lead times (two years after the disaster), often resulting in extremely urgent needs. Existing city resources and other funds from the disaster appropriation will also be examined to ensure all available funding is used where it is most needed. The City of Columbia will utilize some of its existing CDBG staff, contract services, entitlement program infrastructure and funding to effectively manage CDBG-DR programs as outlined below.

### **6.3.2 Housing**

To achieve the greatest impact possible, the city will rely on best practices and lessons learned from prior disasters to develop creative approaches to utilizing the available funding and leverage additional funds for restoration of the city's housing stock. To that end, the city is working with its partners to identify disaster and non-disaster federal, state, private and nonprofit funding sources that are available to assist residents in their recovery efforts. This inclusive strategy will examine the types of funding sources that are available and how those sources can be combined to create a holistic solution to the issues facing residents and communities.



In order to maximize funding to assist low-to-moderate income households the city has committed \$1 million in CDBG program income funding toward the CDBG-DR Minor Repair Program in order to ensure adequate assistance is available to the majority of households with unmet recovery needs. In addition, the city has submitted an application to FEMA to ensure sufficient funding for buyout activities.

### **6.3.3 Economic Development**

To address the unmet needs of businesses impacted by the October 2015 flood event, the City of Columbia will provide \$200,000 of CDBG-DR funding toward forgivable deferred loans to qualified businesses in order to leverage private investment in the local economy and facilitate the retention/creation of jobs for low to moderate income businesses and workers in the city.

### **6.3.4 Infrastructure**

At this time, the city intends to address unmet infrastructure needs by utilizing the FEMA PA and Hazard Mitigation Grant Programs. In addition, the city will rely upon the state of South Carolina general fund allocation providing up to 25% in match for local governments toward FEMA disaster recovery projects.

## **6.4 Protection of People and Property; Construction Methods**

### **6.4.1 Construction Standards**

The City of Columbia has adopted construction methods emphasizing high quality, durability, energy efficiency, sustainability, and mold resistance and continues to address hazard risks from possible sea level rise, high winds, storm surge and flooding. All newly constructed buildings must meet all city building codes, standards and ordinances. Future property damage will be minimized by requiring that any rebuilding be constructed according to the best available science with respect to base flood elevations.

All new construction of residential buildings or replacement and/or reconstruction of substantially damaged buildings will incorporate Green Building Standards, and rehabilitation of non-substantially damaged residential buildings will follow guidelines in the HUD CPD Green Building Retrofit Checklist. Any construction subject to the Green Building Standards will meet an industry-recognized standard and achieve certification under at least one of the following programs:

- ENERGYSTAR;
- Enterprise Green Communities;
- LEED;
- ICC-700 National Building Standard; and
- Any other equivalent comprehensive green building program approved by the City of Columbia.

At this time, the city is considering the procurement of a third-party inspection service in order to ensure that Green Building Standards are met using standardized checklists

developed from the above listed programs. In addition, the city will provide training on Green Building standards and standardized checklists to all city staff administering CDBG-DR construction programs, subrecipients, inspectors, and contractors. Compliance with Green Building Requirements will be memorialized in contracts and grant agreements, as applicable. The city, or the city's designee, will monitor each construction program to ensure compliance with these standards.

#### **6.4.2 Quality of Construction, Bonding, and Warranties**

In order to ensure quality of construction, the city will require all contractors to meet standardized bonding and insurance requirements for CDBG-DR programs. The city will also ensure that contractors are appropriately licensed and have not been debarred from performing work on federally funded contracts. In addition, all contractors pre-approved for work on city CDBG-DR programs will be required to provide a one-year warranty for any work completed on disaster recovery programs.

Supplemental to the city's CDBG-DR grievance procedures, owners of property assisted with CDBG-DR funds will also be provided with several opportunities to appeal the quality of work on their properties. In order for a contractor to receive a final payment, property owners will be required to sign off on a "Completion of Work" form that states that all work has been performed in accordance with the construction contract to their satisfaction. In addition, the city will periodically conduct outreach to property owners during the warranty period. At this time, the city intends to issue a notice to the owner halfway during the warranty period (6 months from the date of final inspection) and 1 month prior to the expiration of the warranty. This will allow sufficient time for property owners to notify the city and contractor of any construction deficiencies.

#### **6.4.3 Dam and Levee Work**

At this time, the city's CDBG-DR funding is not allocated to dam or levee work. An estimated \$77 million in project needs have been identified and is in the process of being documented and submitted to the FEMA Public Assistance program for consideration for the repairs to the city's Canal and Head Gates. It is possible that the city may want to augment any future FEMA award with CDBG-DR funds to address any gaps in assistance. If supplemental CDBG-DR funding is allocated to this activity in the future, the city will submit a substantial Action Plan Amendment to HUD and meet the following requirements:

- Registration with the USACE Levee Base or Dam Inventory
- Document that the structure is admitted under the USACE P.L. 84-99.
- Document that the structure is accredited under the FEMA National Flood Insurance Program.
- Upload project information regarding the location and area served into the DRGR system.
- Establish and maintain documentation related to the project's risk assessment and risk reduction measures.

#### 6.4.4 Elevation Standards

The City of Columbia participates in the National Flood Insurance Program (NFIP) and is monitored by the South Carolina Department of Natural Resources (SCDNR) for compliance with FEMA regulations on behalf of the Federal Emergency Management Agency. In order to maintain compliance with FEMA regulations, the Columbia City Council passed an updated floodplain ordinance on June 16, 2015. This ordinance requires citizens who are building new structures, making significant improvements to existing structures, or those who have experienced significant damages (“significant” means greater than 50% of the value of the original structure) to follow the new ordinance for residential and non-residential structures. This ordinance requires that all construction meeting the above requirements to be built with the bottom of the lowest finished floor at least 2 feet above the Base Flood Elevation (BFE).

The following provisions, among others, are required by the City of Columbia for new construction and substantial improvements in all special flood hazard areas (SFHA):

- New construction and substantial improvements shall be anchored to prevent flotation, collapse or lateral movement; shall be constructed with materials and utility equipment resistant to flood damage; and shall be constructed by methods and practices that minimize flood damage.
- Electrical, heating, ventilation, plumbing, air conditioning equipment and other service facilities shall be designed and/or located to prevent water from entering or accumulating within the components during flooding.
- New and replacement water supply and sanitary sewage systems shall be designed to minimize or eliminate infiltration of floodwaters into the systems or discharges from the systems into floodwaters.
- On-site waste disposal systems shall be located and constructed to avoid impairment to them or contamination from them during flooding.
- In SFHA where base flood elevation data has been provided, new construction and substantial improvement of any residential (including manufactured homes), commercial, or industrial structures shall have the lowest floor elevated no lower than two feet above the base flood elevation (BFE). No basements are permitted in these areas.
- Floodways located in SHFA are extremely hazardous due to floodwater velocity, which carries dangerous debris and can cause erosion. Encroachments are prohibited including fill, new construction, substantial improvements, and other development unless a professional engineer certifies that encroachment will not result in increased flood levels during the base flood discharge.

Provisions for new construction and substantial improvements of residential structures within shallow flooding areas (AO zones), with base flood depths of one to three feet, require that the lowest floor, including basement, be elevated above the highest adjacent grade to the depth specified on the flood insurance rate map (FIRM). If no depth is specified, the lowest floor shall be elevated at least three feet above the highest adjacent grade. All utility and sanitary facilities must be completely flood-proofed. All structures on slopes must have drainage paths around them to guide water away from the structures.

These comprehensive building standards incorporate flood mitigation measures and promote long-term community resiliency that will improve the lives of residents, support community revitalization, and protect the environment. In order to minimize damage from future hazards, the City of Columbia is also implementing Green Building standards. Energy efficiency requirements such as duct and air leakage rate testing certification and solar ready provisions must be met.

According to the City of Columbia Floodplain Manager, the cost of complying with these regulations varies widely based on the location, size, and age of the structure, type of foundation (slab on grade, crawl space, etc.), and the number of utility hookups required. The City Planning Department, which has received 213 applications for permits in the Special Flood Hazard Areas, estimates that overall elevation costs range from \$30,000 to \$100,000 or more. In high damage areas around Lake Katherine and Gills Creek, the average costs ranged from \$50,000 to \$70,000 which is similar to building permit data in Richland County.

#### **6.4.5 Mitigation and Resiliency**

Like other southeastern states, South Carolina's climate is warming less than most of the nation, one half to one degree Fahrenheit in the last century. In South Carolina, the land surface is sinking so the rate of sea level rise relative to the land is greater than the global average rise. Tropical storms and hurricanes have become more intense during the past 20 years, flooding coastal homes and infrastructure more frequently. Climate change is also likely to increase inland flooding. Since 1968, the amount of precipitation during heavy rainstorms has increased by 27 percent in the Southeast and the trend toward increasingly heavy rainstorms is likely to continue.

In 2006 the City of Columbia established the Climate Protection Action Committee (CPAC), a volunteer group that identifies measures that can be taken to reduce greenhouse gases. CPAC was initiated to impact climate change, but now also serves as the City's environmental clearing house, focusing on air quality, energy conservation, water conservation and recycling/waste reduction. CPAC consists of city council member appointees and advisory members from organizations interested in sustainability. CPAC now is evaluating the City's sustainability initiatives with the STAR Community Rating System and expects to complete the STAR evaluation in 2017.

The cost of incorporating mitigation and resiliency measures into local building codes can be difficult to determine; the cost of not incorporating mitigation and resiliency measures into local building codes is extraordinary as evidenced by the 2015 Flood. The following data on the performance and costs of green building measures come from *Incremental Cost, Measurable Savings: Enterprise Green Communities Criteria*, designed specifically for affordable housing.

The average cost per dwelling unit to incorporate the energy and water criteria is \$1917, returning \$4851 in predicted lifetime utility cost savings. The projected lifetime utility cost savings averaging \$4,851 per dwelling unit were sufficient to repay the average \$4,524 per unit costs of implementing the standards in all eight areas including:

- Integrated design – an average cost of \$94 per dwelling or a weighted average cost per square foot of \$.09;
- Location and neighborhood fabric – careful site selection can cost up to \$109 per unit or \$.11 per square foot;
- Site improvements to prevent erosion and limit sedimentation of nearby water bodies - implementing EPA best management practices during construction average cost per square foot was \$.52 or \$227 per unit; installing erosion and sedimentation controls cost \$.06 square foot or \$11 per unit; surface water management cost 30 cents per square foot or \$764/dwelling; these are standard policies and procedures for housing programs using federal funds;
- Water conservation fixtures and appliances cost approximately \$128 per unit, but estimated lifetime water savings was \$935 per unit;
- Energy efficiency - estimated incremental cost per unit of meeting Energy Star or Home Energy Rating System (HERS) standards was \$1784 per unit with an estimated lifetime energy savings of \$3,916 per unit with payback of nine years;
- Environmentally beneficial building materials – the cost per square foot of installing water permeable walkways is 17 cents; to pave parking areas with water permeable material cost 61 cents per square foot;
- Healthy living environments minimize resident's exposure to toxic materials by using safe, biodegradable materials. Costs vary from one cent per square foot for using water and mold resistance materials in wet areas to 58 cents per square foot using flooring materials that minimize dust and mold growth;
- Operations and maintenance – providing operating manuals and orientation guides to educate tenants about proper use and maintenance cost about a penny per square foot or from \$6-15 per dwelling unit.

The incremental cost of incorporating EGCC was lowest among moderate rehab projects with predicted lifetime savings two times the costs of complying, highest return on investment.

#### **6.4.6 Broadband Infrastructure**

In an effort to extend affordable internet access to children and families living in federally assisted housing, the U.S. Housing and Urban Development (HUD) developed the requirement to ensure the installation of broadband infrastructure into most HUD-financed multifamily housing developments during their construction or substantial rehabilitation. Recognizing that it is generally easier and cheaper to install the necessary technology for high-speed internet at the time of construction, HUD is requiring that grantees include these technologies in their program specifications for the substantial improvement of multifamily developments with four or more rental units.

For this reason, the City of Columbia assures HUD that the installation of broadband infrastructure will be included in the rehabilitation and new construction guidelines for all CDBG-DR assisted rental properties with 4 or more rental units.

### **6.4.7 Disaster-Resistant Housing**

Ensuring the provision of disaster resistant housing for all income groups has become the cornerstone of the City of Columbia Action Plan. Based upon the current CDBG-DR allocation strategy, 70% of CDBG-DR funding will be provided to rehabilitate, elevate, and reconstruct housing in accordance with the city's mitigation and resiliency standards. As part of the city's strategy to prioritize the recovery needs of the most vulnerable populations, three main programs have been developed as follows:

#### **Columbia Homeowner Assistance Program (CHAP)**

CHAP was developed specifically to target low to moderate income households residing in single family homes identified by FEMA as sustaining "Major" or "Severe" damages as a result of the flood. While elderly, disabled, and female headed households will be prioritized for participation in the program, it is anticipated that 100% of all identified LMI households will be given the opportunity to receive assistance.

#### **Small Rental Repair Program (SRRP)**

As currently budgeted, 31.3% of CDBG-DR funding has been allocated for the Small Rental Repair Program (SRRP) which was specifically developed to address all 193 LMI occupied rental properties that sustained "Major" or "Severe" damages as a result of the flood. In addition, SRRP was designed to increase affordable housing opportunities for LMI households for a period of three (3) years. Tenants that have been displaced by the storm will be given first priority for participation with elderly, disabled, or female headed households being prioritized for placement in restored units.

#### **Minor Repair Program (MRP)**

MRP was developed to provide an opportunity for limited home repairs for all 1,198 low to moderate income households residing in single family homes identified by FEMA as sustaining "Minor Low" and "Minor High" damages. Due to limited funding, elderly, disabled, and female headed households will be prioritized for participation in the program.

In addition to these programs, the city plans to ensure that the needs of the following populations through continued collaboration with existing organizations and prioritizing identified unmet needs of vulnerable populations requiring assistance.

#### **6.4.7.1 Transitional Housing, Permanent Supportive Housing, and Housing for the Homeless**

The city currently participates in the Greater Columbia Community Relations Council to identify and address fair housing issues and meets quarterly with the Columbia Housing Authority and the United Way of the Midlands to address housing issues in the community, disaster recovery initiatives, and review ordinances and regulations that may pose a barrier to affordable housing for at-risk populations. The city will continue this collaborative effort and will address any recovery needs as identified.



#### 6.4.7.2 Prevention of Low-Income Individuals and Families with Children from Becoming Homeless

The city's current recovery strategy maximizes assistance to low-to-moderate income households. At this time, it is anticipated that 100% of LMI households will be provided the opportunity for assistance in the most impacted areas. In addition, female headed households with children will be prioritized for assistance in all housing programs.

#### 6.4.7.3 Special Needs of Persons Who Require Supportive Housing

The Community Development Department uses HOME Investment Partnership (HOME) and Housing Opportunities for Persons With Aids (HOPWA) funds to further assist our vulnerable population. Our stakeholders consist of Community Housing Development Organizations (CHDO) and sub-recipients that provide housing vouchers, short term rental assistance, mortgage and utility assistance. HOME dollars also provide creative financing alternatives for low-to-moderate income families interested in homeownership. In addition, programs are funded using CDBG Entitlement allocations to support small businesses and create economic and job opportunities for the special needs and vulnerable population.

#### 6.4.7.4 Planning Decisions That May Affect Racial, Ethnic, and Low Income Concentrations

During the development of the Action Plan, the city assessed the impact of the flood event on ethnic, racial, elderly, and low income populations. This assessment was conducted by reviewing 2010 Census Tract information for the areas with highest concentrations of "Major" and "Severe" damages in Lake Katherine, Central and Lower Gills Creek, Wildcat Creek and Penn Branch. Tables 27, 28, and 29 below show the breakdown of these populations in relation to the Census Tracts most impacted by the flood.

**Table 27: 2010 Census Tract Data for the Most Impacted Areas**

Location	Census Tract	Total Pop	Non-Hispanic		Hispanic	
			Pop	%	Pop	%
Lake Katherine	Census Tract Number 24	3,905	3,689	94%	216	6%
Central & Lower Gills Creek	Census Tract Number 26.04	1,697	1,518	89%	179	11%
Wildcat Creek	Census Tract Number 115.01	10,945	9,257	85%	1,688	15%
Penn Branch	Census Tract Number 12	1,820	1,800	99%	20	1%
<b>Total</b>		<b>18,367</b>	<b>16,264</b>	<b>89%</b>	<b>2,103</b>	<b>11%</b>

Source: 2010 Census

**Table 28: 2010 Census Tract Data for the Most Impacted Areas (Continued)**

Location	Total Pop	White Pop	African American Pop	Asian Pop	AIAN Pop	NHPI Pop	Other Pop	2 or More Pop
Lake Katherine	3,905	3,500 (90%)	207 (5%)	40 (1%)	3 (0%)	3 (0%)	112 (3%)	40 (1%)
Central & Lower Gills Creek	1,697	534 (31%)	979 (58%)	27 (2%)	4 (0%)	0 (0%)	96 (6%)	57 (3%)
Wildcat Creek	10,945	6,890 (63%)	2,448 (22%)	437 (4%)	120 (1%)	84 (1%)	424 (4%)	542 (5%)
Penn Branch	1,820	1,643 (90%)	140 (8%)	8 (0%)	6 (0%)	0 (0%)	5 (0%)	18 (1%)
<b>Total</b>	<b>18,367</b>	<b>12,567 (68%)</b>	<b>3,774 (21%)</b>	<b>512 (3%)</b>	<b>133 (1%)</b>	<b>87 (0%)</b>	<b>637 (3%)</b>	<b>657 (4%)</b>

Source: 2010 Census

**Table 29: 2010 Census Tract Data for the Most Impacted Areas (Continued)**

Location	Census Tract	Total Pop	Elderly (65+)	
			Population	%
Lake Katherine	Census Tract Number 24	3,905	694	18%
Central & Lower Gills Creek	Census Tract Number 26.04	1,697	92	5%
Wildcat Creek	Census Tract Number 115.01	10,945	0	0%
Penn Branch	Census Tract Number 12	1,820	222	12%
<b>Total</b>		<b>18,367</b>	<b>1,008</b>	<b>5%</b>

Source: 2010 Census

Overall, 2010 Census Tract information for impacted areas demonstrates that the population residing in housing most damaged by the flood were Non-Hispanic (89%), White (68%), and under the age of 65 (96%). However, the only exception is the disproportionate impact to the African American households in Central and Lower Gills Creek areas. In these areas, 2010 Census Data shows that 58% of the population is African American which is significantly higher than all other concentrated areas of FEMA “Major” and “Severe” damage. Self-reported income data for Central and Lower Gills Creek also shows that there are a higher number of low income rental households that could be potentially be displaced by buyout or rehabilitation activities.

As can be seen by the city's allocation strategy, planning for the recovery needs of the most vulnerable households in all areas damaged by the flood has been a priority for the City of Columbia. For this reason, program documents have been and will continue to be translated into Spanish for Hispanic and other households

that do not speak English as their primary language. In addition, the city has allocated 70% of all funding for the restoration of low-to-moderate income households in order to minimize displacement and prevent homelessness.

#### **6.4.8 Minimize or Address Displacement (URA)**

The City of Columbia will minimize displacement of persons or entities as a result of the implementation of CDBG-DR projects by ensuring that all CDBG-DR programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended (49 CFR Part 24) and the implementing regulations at 24 CFR Part 570.496(a). All subrecipients will be required to demonstrate that they have adopted policies and procedures to minimize displacement in accordance with these regulations and will be monitored by the city to ensure compliance with URA. In addition, the city and any subrecipients will consider the adoption of Optional Relocation Policies for voluntary housing programs that may result in temporary displacement of residents affected by the flood event. All tenants permanently displaced by CDBG-DR project activities will be provided relocation benefits in accordance with URA requirements.

#### **6.4.9 Program Income**

As an entity that receives CDBG Entitlement funding, the City of Columbia understands that when implementing certain activities with CDBG-DR funds, there is potential for generating program income. All program income generated by CDBG-DR funds will be accounted for and expended in accordance with HUD regulations and current program income procedures. Program Income will continue to be spent on projects that further recovery in areas impacted by the October 2015 flood event. These funds will continue to be considered Disaster Recovery funds and will be subject to all CDBG-DR regulations and eligible activities. Any program income generated will be governed by the program income guidance provided in the regulations at 24 CFR 570.489(e) and 24 CFR 85.25 and all applicable waivers.

#### **6.4.10 Monitoring Standards and Procedures**

In accordance with Federal Register Vol. 81, No. 117 (Notice), the City of Columbia must have adequate procedures to effectively monitor and manage funds that are disbursed to sub-recipients and/or individual applicants. In addition, the Notice requires that the city has policies in place to address fraud, waste, and abuse. As described in the city's *CDBG-DR Risk Assessment*, the following procedures have been developed.

##### **6.4.10.1 Sub-recipient Monitoring Plan**

The City of Columbia Community Development Department will use its existing risk based monitoring strategy to monitor the program activities and performance of sub-recipients. This monitoring strategy includes a process to conduct a risk analysis in order to determine the level of monitoring that will be conducted. High risk sub-recipients, project sponsors, and CHDOs are monitored onsite in the same fiscal year in which the risk analysis is conducted. In addition to onsite visits, the city undertakes annual remote or desktop monitoring for all sub-recipients, project

sponsors and CHDOs. Remote or desktop monitoring is conducted by evaluating various in-house materials such as: applications for funding, written agreements, reimbursement requests, progress reports, drawdown reports, previous monitoring determinations and audits. This monitoring process allows the City to better track program progress and provide technical assistance as needed.

The following positions are responsible for monitoring the various program areas:

**Table 30: Monitoring Staff**

Staff Position	Program Areas
Community Development Administrator	CDBG, HOME, HOPWA
CD Compliance Specialist	CDBG, HOPWA, Labor Standards, Sec. 3/MBE/WBE URA
CD Compliance Specialist	CDBG, HOME, Fair Housing, Lead-Based Paint, ERR
Sr. Loan Officer/HOME Coordinator	HOME/CHDO
CD Coordinator	Financials
CD Facilities Manager	Construction Management

Due to the receipt of CDBG-DR funds, the city anticipates that this staff will be expanded to monitor additional sub-recipients and individual applicants. This staffing adjustment has been included in the *City of Columbia CDBG-DR Pre-Award Implementation Plan*.

In addition to the City of Columbia Monitoring Strategy, the city also issues sub-recipients with a Grant Administration Manual that provides sub-recipients with in-depth review of the city's monitoring process and the documentation required for a monitoring visit. Supplemental to onsite or desktop reviews, the city also requires sub-recipients to submit a monthly report detailing the implementation and administration of the activity or program. The monthly programmatic report includes the following:

- Progress in meeting stated goals and objectives;
- Changes in staff or Board of Directors;
- Problems encountered and steps taken to resolve them;
- Other general information as appropriate;
- A "Monthly Sub-recipient Client Summary" which captures the income, ethnicity, and household status of clients receiving CDBG-funded assistance within the reporting period.

Monthly programmatic reports are due in the City Community Development office by the fifteenth (15th) working day of the month following the month when services

were provided. In addition to the programmatic reports, sub-recipients are also required to submit a monthly report concerning the financial and accounting status of the activity or program which includes the following:

- Summary of all disbursements of CDBG funds.
- Summary of all requests for reimbursement of CDBG funds.
- Report on percentage of CDBG funds expended and remaining by cost category.
- This report is also due in the City Community Development office by the fifteenth (15th) working day of the month following the month when services were provided.

Based on monitoring results, reporting, and other criteria, Community Development staff may meet with sub-recipients whose performance does not appear to be sufficient to meet the goals and achievements as outlined in the agreement. An on-site visit may occur to discuss the service activity shortfall. On-site monitoring visits may also be conducted in order to ascertain that eligible clients for whom the program was intended are being served and that in the event of an audit, the required client information is being maintained.

Based on the information received from the sub-recipient, Community Development staff submits monthly reports on sub-recipient goals and progress to City Management. Staff may recommend corrective action to be taken should other efforts at obtaining compliance be ineffective.

#### **6.4.10.2 Applicant Monitoring**

In order to minimize the misappropriation of or misuse of CDBG-DR funds and reduce the likelihood of applicant fraud, the city will require individual applicants to sign certifications at the application and grant agreement phases of the program. Certifications will require that individual applicants acknowledge and certify that:

- Information provided in the application for assistance is complete and accurate.
- Reported damages or losses are caused as a result of the declared disaster.
- All funding for assistance received as a result of the disaster has been disclosed.
- They acknowledge and understand that Duplication of Benefits (DOB) is not allowed by federal regulations and agree to subrogation of any additional funding received for the same purpose.
- The damaged residence is their primary (not secondary) home, if applicable.
- Collusion with or kickbacks from program contractors is not allowed.
- They have no conflict of interest with city officials, sub-recipients (if applicable), or program contractors.

- There is potential repayment of funding or prosecution for making false, misleading, and/or incomplete statements and/or documentation.

In addition to signing the above notarized statements, the city and sub-recipients shall develop monitoring plans for each program to ensure that the applicants are in compliance with the terms of their grant agreement and covenant (if applicable). The city's Community Development Department will be responsible for reviewing and approving sub-recipient monitoring plans and reports, as necessary. Compliance and monitoring plans and reports will be made available to HUD upon request.

#### **6.4.10.3 Internal Auditor**

In conjunction with the administration and oversight of CDBG-DR funding, the City of Columbia will hire an independent internal auditor who will report directly to the City Manager. The role of the internal auditor will be to conduct internal monitoring/audits of city administered CDBG-DR programs as directed. The auditor will also be responsible for the coordination and response to external audits or monitoring by city, state, and federal agencies. In addition, the auditor will be responsible for the detection and prevention of fraud, waste, and abuse in city and sub-recipient administered programs as well as coordinating allegations of fraud with city, state, and federal law enforcement agencies. This responsibility includes the presentation of cases to HUD OIG and/or U.S. Attorney's office for prosecution if necessary. This staffing adjustment has been included in the *City of Columbia CDBG-DR Pre-Award Implementation Plan*.

#### **6.4.10.4 Anti-Fraud Waste and Abuse**

In order to minimize fraud, waste, and abuse in all CDBG-DR programs, the city's internal auditor will develop procedures related to the identification of fraud and establish a process to disclose alleged fraudulent activities. In addition, the city's internal auditor will require the acknowledgement and acceptance of these policies and procedures by staff, contractors and subrecipients. In conjunction with the internal auditor, the Community Development Department will require each sub-recipient to demonstrate that they have procedures and/or systems in place to identify and report potential fraud, waste and abuse in their CDBG-DR program(s) prior to the release of funds. If suspected fraud is identified, sub-recipients will be required to immediately report the information to the City of Columbia City Manager or Internal Auditor. The city will in turn refer the matter to the HUD Office of Inspector General (HUD OIG) and other law enforcement agencies where appropriate.

In concert with the HUD OIG and other law enforcement agencies, the city will take appropriate measures to address such allegations as the circumstances dictate. In the event that the city has actual knowledge of a misappropriation of funds or assets, the matter will additionally be referred to the applicable office of district attorney and/or office of the state Inspector General, if not already notified. In addition, the city will conduct regular monitoring of sub-recipients and will report any potential fraud, waste and abuse to these same law enforcement agencies.



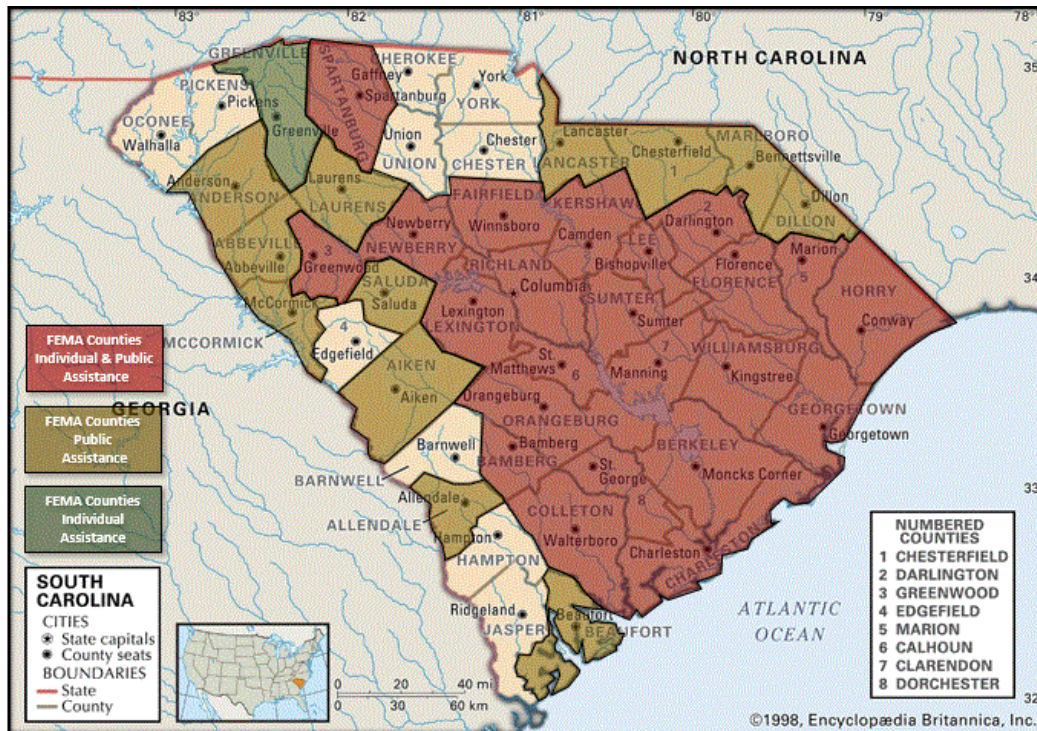
It is important to note that Conflict of Interest statements are included in the City of Columbia Personnel Policies and all sub-recipient grant agreements. These statements mandate that no person who exercises or has exercised any functions or responsibilities with CDBG-DR activities shall obtain a financial interest of benefit from any CDBG-DR project or program. The city will only consider an exception to these provisions after the sub-recipient has: 1) disclosed the full nature of the conflict and submitted documentation that the disclosure has been made public and 2) provided a legal opinion stating that there is no violation of city, state, or federal law if the exception is granted.

In addition to grant agreements and contracts, individual program CDBG-DR staff, subrecipient staff, program applicants, and contractors/contracted staff will be required to sign a disclosure form regarding potential conflicts of interest as they relate to the city (staff, elected officials, etc.), program contractors, subrecipients, and applicants. For CDBG-DR program staff, subrecipients, and contractors, the disclosure forms will be signed as a part of on-boarding activities prior to performing any CDBG-DR program functions. Individual applicants for CDBG-DR assistance must also fill out and sign the disclosure forms as a part of the application intake process.

In addition, the City of Columbia CDBG-DR Recovery Website will have the phone number of city and federal law enforcement agencies in order for external parties to report allegations of fraud.

## 7.0 Location, Mitigation Measures, Use of Urgent Need

As shown in the figure below, the City of Columbia is located in Richland County which is included as part of the presidential declaration for DR-4241. As such, the City of Columbia has received its own allocation of \$19,989,000 million in funding from HUD to address unmet recovery needs in the city. In order to be eligible for CDBG-DR assistance, damaged properties or businesses must be located within city limits.



In order to minimize the amount of damage from future hazards, the City of Columbia is committed to elevating new and existing structures in accordance with the city's floodplain ordinance. Also, the city will implement Green Building standards as required by HUD's Federal Register Notice. As of July 2016, no additional mitigation measures are anticipated, but the City of Columbia is evaluating the existing FEMA Programmatic Agreement (PA) and Addendum in order to streamline the environmental clearance process. If the city elects to sign on to the FEMA Programmatic Agreement and Addendum, there may be additional mitigation and/or treatment measures that are required which will be incorporated into the city's disaster recovery process and CDBG-DR budget as necessary.

In accordance with this allocation, the City of Columbia recognizes that the use of the "Urgent Need" National Objective is waived for CDBG-DR grants until 24 months after HUD obligates funding to the city. While the city is committed to prioritizing assistance to low-to-moderate income applicants, there are several programs that will require the use of the "Urgent Need" National Objective in order to meet the unmet recovery needs of non-LMI households and businesses. In all cases, CDBG-DR funding will be limited to the most impacted and distressed households and businesses. These needs are outlined in the city's unmet needs assessment and are reflected in the program designs contained in this Action Plan.

## 8.0 Clarity of Plan and Citizen Participation

### 8.1 Citizen Participation Plan

In compliance with HUD requirements and community expectations, the City of Columbia has developed a Citizen Participation Plan specifically for CDBG-DR programs resulting from the October 2015 flood event. The goal of the Citizen Participation Plan is to provide meaningful and inclusive opportunities for citizen involvement in the planning, development, and administration of all CDBG-DR programs whether administered by the city or subrecipients.

During the development of this Action Plan and for any substantial amendments, citizens, applicants, and other stakeholders have and will be given an opportunity for reasonable and timely access to information and a minimum of 14 days to submit comments relating to the allocations of CDBG-DR funding, program design and eligible activities, and any modifications to the original Action Plan. In addition to receiving citizens' comments on the initial CDBG-DR Action Plan, the city held two outreach events during the development of the action plan and one additional outreach during the public comment period. These outreach events were held to inform the public of the funding process and solicit input regarding the recovery needs of the community. Significant efforts were made to notify the public and generate participation as described in section 6.3, *Public Engagement*, below. These types of outreach efforts will be continued as recovery needs evolve and program activities are modified to respond to these changes.

The city's initial Action Plan and subsequent amendments will be posted to the City of Columbia CDBG-DR website in both English and Spanish in accessible formats. Public notices regarding the Action Plan and subsequent notices will be posted in *The State* newspaper and will also be placed in a prominent location on the city's main website along with a hyperlink for the city's CDBG-DR website. The CDBG-DR website will also display an announcement on its home page with a hyperlink to the Action Plan (or amendment). In addition to accepting public comments via more traditional methods (email, mail, and fax) the city's CDBG-DR website is also enabled to receive public comments. All comments and city responses will be incorporated into the Action Plan or Action Plan amendment for HUD review. Comments related to similar topics will be aggregated as necessary.

Citizens with disabilities or those who need technical assistance or reasonable accommodations will be encouraged to contact the City of Columbia Human Resources Employee Relations Officer/ADA Coordinator, Gardner Johnson for assistance, at:

- Phone: 803-545-4625
- Email: [gljohnson@columbiasc.net](mailto:gljohnson@columbiasc.net)
- Mail: 1225 Lady Street, P.O. Box 147, Columbia, SC 29217

Supplemental to the posting of the Action Plan and subsequent amendments on the city's CDBG-DR website, the following will be posted and updated consistently updated to promote transparency and provide the latest available information on the city's recovery efforts:

- Program Policies and Documents
- DRGR QPR Reports

- Program Performance Reports
- Procurement Policies and Opportunities
- CDBG-DR Contracts and Status Reports

## 8.2 Citizen Grievances or Complaints

During the application intake process, applicants will be provided with the city's Grievance Procedures which contain a point of contact, street address, and telephone number along with timeframes for filing a grievance. As a part of this process, applicants will be required to sign a receipt that they acknowledge and understand the grievance/complaint process. The city (and subrecipients, if applicable) will provide a written response to each inquiry within 15 calendar days of receiving the complaint, as practicable. All citizen or applicant grievances shall be appropriately logged and filed in a central repository for HUD review and monitoring. Additionally, a copy of the grievance and response will be filed/uploaded to the applicant's file. In the case that the grievance has been forwarded to the city by HUD, the city's (and/or subrecipient's) response to the grievance shall be copied to HUD and emailed to HUD's designed DR email address.

Upon request, non-applicants or otherwise affected citizens will be provided a copy of the city's CDBG-DR Grievance Procedures for review and filing a grievance regarding CDBG-DR programs. Citizen grievances/complaints will be processed in the same manner as program applicants. Responses will be issued by the city within 15 calendar days, logged, and filed in the same central repository for the applicable program.

## 8.3 CDBG-DR Action Plan Opportunities for Public Engagement

As part of the process to develop the City of Columbia CDBG-DR Action Plan, the city has placed a high priority on public engagement. Additionally, recognizing the synergies from working in concert with its peers in Lexington and Richland Counties, the City has sought to combine efforts where appropriate. This has led to a robust engagement process with multiple opportunities to present to, hear from, and otherwise engage the concerned and impacted citizens of the City of Columbia.

The Columbia City Council meets regularly and its meetings are open to the public and broadcast on the internet. In addition to the members of the Council, the larger public is welcomed to ask questions and voice concerns on matters raised in the meetings. Agendas are publicized in advance of the meetings to provide broad notice to the public the items to be discussed. On two separate occasions, the Council and general public were presented the status of progress and the next steps in the development of the CDBG-DR Action Plan. Those meetings were held in the City Council Chambers on June 21 and July 19, 2016.

Additionally, in concert with Lexington and Richland Counties, the City of Columbia held a targeted outreach session with area housing service providers on July 22, 2016 at a meeting facility owned by the Columbia Housing Authority. This session allowed each jurisdiction to present preliminary information on its analysis of unmet needs and related CDBG-DR activities. Additionally, the 38 participants were informed about the overall requirements of the use of CDBG-DR funds and key compliance factors. From this discussion, the City learned that local housing service providers had the necessary resources to recover from the storm damage. Some did express, however, an ongoing concern for families who remained displaced. The city also



worked with the Columbia Housing Authority in order to assess unmet recovery needs of this agency and potential program beneficiaries.

Subsequent to this meeting, the City held a session for the broader public with a particular focus on City of Columbia residents and businesses that were impacted by the storm. The session was held on the evening of July 28, 2016 at a City owned community facility meeting room at Edisto Discovery Park, a location near the most heavily impacted areas of the City, and 30 concerned citizens were in attendance. There, the City presented an overview of the CDBG-DR program and the requirements outlined in the Federal Register Notice governing the use of the City's allocation.

Overwhelmingly, participants voiced concerns that their incomes exceeded the limitations to qualify as a Low-to-Moderate Income family. As such, participants believed that the CDBG-DR funded programs would not provide needed relief to repair or elevate their damaged homes or provide buyout assistance to relocate out of a designated floodway. As part of this process, city officials explained they understood the concerns and would make their best efforts to meet all program requirements while addressing the unmet needs of the broader community including non-LMI families with a remaining unmet need.

In accordance with the Public Comment requirements of the City's CDBG-DR allocation, the City has also provided the citizens of Columbia 14 calendar days to review and comment on its Draft CDBG-DR Action Plan. During this 14-day period, the City also held its final outreach session on the evening of August 25, 2016 at the Drew Wellness Center, a centrally located public facility. Supplemental to this event, comments on the plan were accepted by mail, email, fax, or submittal via the city's CDBG-DR flood recovery website. Comments and concerns raised in this session and others have been incorporated in the City's final Action Plan as Exhibit B.

The Action Plan made available to the public included an evaluation of unmet recovery needs based upon best available data, basis for CDBG-DR allocations, budget of proposed CDBG-DR programs including description of eligible activities, and outlines the methods by which the City of Columbia will meet all federal requirements. The initial Action Plan for the city has been made accessible via the city's CDBG-DR flood recovery website in both English and Spanish. The notice for the availability of the Action Plan has also been posted in a prominent location on the city's main website and on the CDBG-DR flood recovery webpage. In addition, the city has provided contact information on the website for any citizen that may request a reasonable accommodation to access the Action Plan or public outreach events pertaining to the development of the city's CDBG-DR Action Plan.

The initial City of Columbia CDBG-DR Action Plan was posted to the city's website on August 19<sup>th</sup> date with a deadline for public comments ending on September 6, 2016. In addition, a public notice regarding the availability of the plan for review was published in *The State* newspaper, the publication with the widest circulation in the City of Columbia, on August 16, 2016. All public comments received on the plan have been incorporated into the final Action Plan submitted to HUD for review and approval.

## 8.4 Amendments to the Columbia CDBG-DR Action Plan

As the recovery needs of the Columbia change over time, the city may elect to update its needs assessment, modify or create new activities, or reprogram CDBG-DR funds as necessary. Action Plan Amendments will be memorialized and approved as follows:

### 8.4.1 Substantial Amendments

The city defines substantial amendments to the Action Plan as those that propose one or more of the following changes to the initial plan:

- A change in the purpose, scope, location or beneficiaries of an activity approved in an Action Plan or subsequent amendment;
- The allocation or re-allocation of more than \$1 million; or
- The addition or deletion of any allowable activity described in the approved plan.

Only those amendments which meet the definition of a substantial amendment are subject to the citizen participation process. Citizens will be provided at least 14 days to review and comment on all substantial Action Plan Amendments. A summary of all comments received and a response to those comments will be included in the final Substantial Amendment submitted to HUD for approval.

### 8.4.2 Non-Substantial Amendments

The city will notify HUD of all non-substantial Action Plan Amendments in writing for review and comment. If no changes are required, the non-substantial amendment will be posted to the CDBG-DR website.

### 8.4.3 Submittal of Amendments

A substantial amendment to the Action Plan will follow the same procedures for publication as the original Action Plan in accordance with the city's Citizen Participation Plan. All amendments, both substantial and non-substantial, will be posted on the city's CDBG-DR website. The beginning of every amendment will include a section that identifies the content that is being added, deleted, or changed. In addition, this section will include a revised budget allocation table that reflects the entirety of all funds and will clearly illustrate the movement or reallocation of program funding. The city's most recent version of the entire Action Plan will be accessible for reviewing as a single document at any given time.

## 8.5 Risk Analysis Documentation and Pre-Award Implementation Plan

Supplemental to this CDBG-DR Action Plan, the City of Columbia submitted all *Risk Analysis Documentation* to include the *City of Columbia CDBG-DR Pre-Award Implementation Plan* in compliance with PL. 114-113 in order to demonstrate sufficient capacity to effectively manage and provide oversight of CDBG-DR funding. Two hard copies and one digital copy of this documentation accompanied with all applicable certifications was submitted to HUD on July 22, 2016. Key aspects of this plan include the following:



### 8.5.1 Assessing Capacity

The City of Columbia CDBG-DR Pre-Award Implementation Plan assures HUD that the City has conducted an internal assessment of existing capabilities and capacity for the administration of CDBG-Disaster Recovery funding allocated as a result of the October 2015 flood event (PL 114-113). This assessment was conducted in conjunction with the city's Risk Analysis and addresses organizational flexibility and staffing in the following areas to ensure compliance with the Federal Register Notice and HUD regulations:

- Environmental Compliance
- Financial Management
- Procurement and Contract Management
- Information Technology (IT)
- Reporting
- Case Management
- Compliance and Monitoring
- Quality Assurance and Quality Control

### 8.5.2 Environmental Clearance

The City of Columbia, as the Responsible Entity (RE), intends to complete the environmental review process under a Programmatic Agreement (PA) and Tier I Environmental Reviews and Request Release of Funds as soon as possible. Columbia currently has an environmental review process in place and will hire a contractor to conduct environmental reviews for CDBG-DR projects. The city also is working with HUD to assess the benefits of adopting South Carolina's FEMA PA and a HUD proposed Addendum to expedite Section 106 reviews of CDBG-DR funded projects.

At this time, the City anticipates issuing a RFQ for environmental services to coordinate the environmental and Section 106 process with Community Development Department CDBG-DR Project Managers. If the city adopts the FEMA PA and Addendum, the city will also hire a qualified historic preservation consultant, if necessary.

### 8.5.3 Financial Management

The City of Columbia has completed the *Public Law 114-113 Guide for Review of Financial Management* (the Financial Management Guide) as part its Disaster Recovery Risk Analysis. Based upon this review and the current processes governing its annual allocation of CDBG entitlement funding, it has been determined that the City has established sufficient financial controls to administer CDBG-DR funding. During its review, the Finance Department identified the need for additional finance staff to adequately track and monitor the obligation and expenditure of CDBG-DR funds. For this reason, the city intends to hire an additional Financial Analyst for the Finance Department to supplement existing staff and coordinate CDBG-DR activities (draw requests, invoices, etc.) with the Community Development Department.

#### **8.5.4 Procedures to Ensure Timely Expenditures of CDBG-DR Funding**

In accordance with Federal Register Vol. 81, No. 117 (Notice), the City of Columbia must track and document the timely expenditure of disaster recovery CDBG funding (CDBG-DR) received to recover from the severe storms and flooding resulting from Hurricane Joaquin (DR 4241/3373). In order to ensure expenditure of all CDBG-DR funds within the required six-year period, the City of Columbia must submit projections regarding the obligation and expenditure of all CDBG-DR funds over the life of the award as well as the anticipated outcomes associated with program activities. These projections enable the City of Columbia and the Department of Housing and Urban Development (HUD) to evaluate progress on program activities and ensure recovery efforts are achieved in a timely manner. To achieve these goals, the city has established procedures to implement strict guidelines for all city administered projects and within grant agreements with sub-recipients. In addition, the city will provide technical assistance and support to all sub-recipients as needed so that quarterly goals are met and funds are expended within all deadlines.

#### **8.5.5 Procedures to Effectively Manage CDBG-DR Funds**

In accordance with Federal Register Vol. 81, No. 117 (Notice), the City of Columbia must have adequate procedures to effectively monitor and manage funds that are disbursed to sub-recipients and/or individual applicants. In addition, the Notice requires that the city has policies in place to address fraud, waste, and abuse. As part of the Risk Analysis and Pre-Implementation Plan, the city has developed procedures to initiate an internal audit function, conduct monitoring of Sub-Recipients and Applicants, and prevent Fraud, Waste, and Abuse.

#### **8.5.6 Procurement and Contract Management**

In preparation for CDBG-Disaster Recovery funding, the City evaluated its procurement processes and procedures to ensure compliance with 2 CFR 200 through 200.326. As a result, the City has developed and adopted the CDBG-DR Procurement Guide (see *Risk Analysis Attachment C-1*) to ensure compliance with 2 CFR Part 200. In conjunction with this review, the Procurement Department also evaluated its capacity to ensure sufficient staffing for Disaster Recovery procurement and contract administration activities. As a result, the department has realigned existing staff and filled all necessary positions to assume new Disaster Recovery responsibilities.

#### **8.5.7 Information Technology (IT)**

The city anticipates enhancing IT solutions (Zoom Grants) and/or procuring an IT contractor to develop a system to track and report on CDBG-DR programs as well as retaining program documentation. As such, the city has evaluated its existing IT solution and determined that Zoom Grants can develop a customized IT solution for managing disaster recovery programs.

### **8.5.8 Reporting**

The Community Development Department will designate an existing or new staff person to serve as the Disaster Recovery Grant Reporting (DRGR) Reporting Analyst, who will be responsible for entering complete, accurate program information into HUD's DRGR System, submitting Quarterly Performance Reports (QPR), and uploading the QPR to the city's website within three days of submittal to HUD. The Reporting Analyst will also develop and monitor CDBG-Disaster Recovery expenditures and program performance using HUD's *CDBG DR Grantee Projections for Expenditures and Outcomes* template.

### **8.5.9 Procedures to Maintain a Comprehensive Website**

In accordance with Federal Register Vol. 81, No. 117 (Notice), the City of Columbia must have adequate procedures to maintain a comprehensive website regarding all disaster recovery activities. Prior to the issuance of the Notice, the City of Columbia established a separate webpage for the flood recovery at <http://columbiasc.gov/flood>. To date, this website has been used to report the status of FEMA DR 4241 flood recovery projects and other general information for the public. As a result of CDBG-DR funds being appropriated, the city has created a separate CDBG-DR website <http://dr.columbiasc.gov/> to conform to the requirements in the Notice. The City's CDBG-DR webpage will also be updated on a regular basis in accordance with established procedures and standards so that it will contain links to information regarding the use and management of grant funds, links to all action plans and action plan amendments, performance reports, citizen participation notices, and program information for activities described in the action plan, including details of all contracts and ongoing procurement policies.

### **8.5.10 Case Management**

In accordance with Federal Register Vol. 81, No. 117 (Notice), the City of Columbia must establish adequate procedures to facilitate effective communication to individual applicants and keep them well informed on the status of their application for disaster recovery assistance. The city intends to implement a robust case management approach for programs involving individual applicants. At this time, the city intends to perform case management services in-house with additional personnel augmented by nonprofit and volunteer organizations. This decision will be based upon program design, capacity of city departments, estimated number of eligible applicants, and potential need for a call center and/or document management capabilities.

In conjunction with the Community Development Case Management staff, the city's Section 504 or Special Needs Coordinator will ensure that accessibility requests from disabled applicants are handled appropriately and that in-house visits are conducted with applicants who are unable to access program facilities. The city already has a firm under contract to provide translation services for applicants unable to effectively communicate in English.

### **8.5.11 Procedures to Ensure Timely Information on Applicant Status**

The City of Columbia, in conjunction with sub-recipients if applicable, will customize communication policies and procedures for each program that involves CDBG-DR funding to individual applicants. Using this model, applicants in both city and sub-recipient administered programs will receive Case or Claims Managers who will be responsible to communicate via in person meetings and written letters to program applicants during all phases of program activities from applicant intake to close out. In order to ensure that this communication occurs in a timely manner, Case or Claims Managers will have performance metrics by which to notify applicants via letter with follow up phone calls at key stages during the life cycle of the program. All written correspondence to the applicant must be uploaded into the system of record and/or hard copy file within 24 hours of any notification by regular mail in the applicant's preferred language. Depending upon program type, examples of key program stages may include:

- Applicant Intake
- Application Complete
- Eligibility and Benefit Determination Complete/Notification of Eligibility or Ineligibility
- Environmental Review Complete
- Grant/Subrogation Agreement Complete
- Notice to Proceed (if applicable)
- Change Orders (if applicable)
- Construction Complete/Initiation of Warranty Period (if applicable)
- Monitoring review and status (Compliant or Non-Compliant)
- Close out status complete or grant recovery

In addition, all programs will provide applicants with written grievance procedures at application intake. All applicant grievances shall be documented in a centralized log/repository for each program with a written response provided via regular mail within 15 days. All written correspondence to individual applicants will be uploaded to the system of record and/or placed in hard copy files within 24 hours of mailing. Case or Claims Managers will also be required to make a follow up phone call to notify the applicant regarding the outcome of their claim and explain that they will receive a response letter via regular mail.

### **8.5.12 Duplication of Benefits Analysis**

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) requires that recipients of federal disaster recovery funding make certain that no "person, business concern or other entity" will receive duplicative assistance'. Because disaster assistance to each person/entity varies widely based on their insurance coverage and eligibility for federal funding, grantees cannot comply with the Stafford Act without first completing a duplication of benefits (DOB) analysis specific to each applicant.

A Duplication of Benefit occurs when:

- A beneficiary receives assistance, and
- The assistance is from multiple sources, and
- The assistance amount exceeds the need for a particular recovery purpose.

As part of the Risk Analysis and Pre-Implementation Plan, the city has developed a plan to implement DOB policies and procedures as well as conduct compliance and monitoring activities. See Exhibit E for the City of Columbia Duplication of Benefit Procedures.

### **8.5.13 Compliance and Monitoring**

Due to the complexities of CDBG-Disaster Recovery programs and some outsourcing of key internal controls, proactive compliance and monitoring plans are necessary to ensure that program applicants comply with program requirements and that contractors and subrecipients perform in accordance with their approved contracts and agreements. For this reason, the Community Development Department will hire at least at least two Disaster Recovery Compliance & Monitoring Specialists and two Disaster Recovery Housing Inspectors.

### **8.5.14 Quality Assurance/Quality Control (QA/QC)**

The accuracy of program and benefit calculations are key to the success of CDBG-DR programs. In order to achieve this goal, the City of Columbia will develop a comprehensive QA/QC Plan governing all CDBG-DR programs to ensure complete and accurate project files in compliance with the Federal Register Notice and the city's grant agreement with HUD. The QA/QC Plan, developed under the direction of the Internal Auditor, will identify compliance issues, and monitor implementation of best practices for disaster recovery, quality design and construction; and maintain integrity and public confidence in the program.

### **8.5.15 Organizational Structure**

The City of Columbia is managed by a Council-Manager form of government with the Community Development Department reporting directly to the Assistant City Manager of Operations and Development Services. Several city departments must augment current staffing and capacity to effectively manage diverse programs and the timely expenditure of CDBG-DR funding. A staffing augmentation plan has been created and was based upon the assessments conducted as part of the city's Risk Analysis as well as the areas outlined in this Pre-Award Implementation Plan.

## **8.6 Summary of Public Comments & Response**

As previously stated, the City of Columbia CDBG-DR Action Plan was posted for public comment from August 19, 2016 through September 6, 2016. The plan was posted on the city's CDBG-DR website in English and Spanish. In addition, a public notice was published in *The State* newspaper on August 16, 2016 and posted in a prominent location on the city's homepage.

Comments were accepted via mail, fax, email and the city's CDBG-DR website. A summary of those comments and the city's responses can be found in Exhibit B.

## **8.7 Certification of Controls, Processes, and Procedures**

As directed by Federal Register resulting from the PL. 114-113, the City of Columbia commits to all required certifications as shown on the following pages. In addition, the city has attached a completed and executed Federal form SF-424 signed by the City of Columbia Manager as Exhibit D. Also included in Exhibit D are the completed checklists for the development of the Action Plan and list of Certifications.



## 9.0 Conclusion

### 9.1 Complete and Compliant

The City of Columbia has completed all required sections of the CDBG-DR Action Plan and “*Action Plan Checklist for Funds under Public Law 114-113*” in compliance with the Federal Register Notice and Public Law 114-113.

### 9.2 Pre-Award, Pre-Agreement, and Reimbursement

The City of Columbia has incurred pre-award and pre-agreement costs of approximately \$404,350 for the following planning and program administration activities:

CDBG Risk Analysis and Action Plan Development	\$161,150
Translation Services	\$3,200
DRGR Grant Reporting Training	\$3,100
CDBG-DR Administrative Set-Up	\$225,000
CDBG-DR Program Design	\$3,800
Environmental Services	\$8,100
<b>Total</b>	<b>\$404,350</b>

Upon approval of the City of Columbia Action Plan, the Office of Community Development will also issue an RFQ for environmental services for Tier I and Tier II clearance processes which will include consultation with the State Historic Preservation Office (SHPO). The City will seek reimbursement for these activities once the Request for Release of Funds is approved.

In addition, it should be noted that the City of Columbia is currently consulting with both HUD and FEMA regarding the adoption of the existing FEMA Programmatic Agreement and Addendum in order to streamline the Section 106 process for CDBG-DR programs and individual projects. As part of this on-going process, the city’s proposed Elevation Reimbursement Program may be adjusted to establish certain deadlines related to the reimbursement of elevation activities undertaken as a result of the release of CDBG-DR funding. At this time, elevation reimbursement will not be provided for elevation projects permitted after the one-year anniversary of the flood event.

### 9.3 Uniform Relocation Act Clarification

A demonstrable hardship is a substantial change in an Applicant’s situation that prohibits or severely affects their ability to provide a minimal standard of living or the basic necessities of life including food, housing, clothing, and transportation without causing economic distress well beyond mere inconvenience as shown by objective evidence. A demonstrable hardship must have occurred after the October 2015 flood event. In addition, any demonstrable hardship must be of a severe, involuntary, and unexpected nature. It must not be one that is generally shared by other Applicants affected flood. Examples of a demonstrable hardships may include job loss, failure of a business, divorce, severe medical illness, injury, death of a family member or spouse, unexpected and extraordinary medical bills, disability, substantial income reduction, unusual and

excessive amount of debt due to a natural disaster, etc. None of the listed examples above, individually or taken together, automatically establish a demonstrable hardship nor is the listing above exhaustive as there may be other factors relevant to the issue of demonstrable hardship in a particular case.

The City of Columbia will define “demonstrable hardship” and “not suitable for rehabilitation” as they relate to recovery programs in the policies and procedures associated with the use of the city’s CDBG-DR funds as they relate to each particular program.

## **9.4 Deadlines**

Included as part of the City’s Action Plan is the “*City of Columbia Expenditure and Outcome Timeline*” (Exhibit C). This timeline demonstrates the city’s plan to initiate CDBG-DR programs, carry out program activities, and achieve program close out within the HUD prescribed 6-year timeline. While the city fully understands and will comply with the requirement to draw down funds no later than 180 days after the effective date of the Federal Register Notice which is December 19, 2016, the submitted timeline starts on January 1, 2017.

## **9.5 Most Impacted and Distressed**

As discussed in previous sections of the Action Plan, the City of Columbia is located in Richland County which is included as part of the presidential declaration for DR-4241. As such, the City of Columbia has received its own allocation of \$19,989,000 million in funding from HUD to address unmet recovery needs in the city. In order to be eligible for CDBG-DR assistance, damaged properties or businesses must be located within city limits. Also, it should be noted that the areas most impacted in the city (Lake Katherine, Central and Lower Gills Creek, Wildcat Creek and Penn Branch) have been prioritized for assistance with CDBG-DR funds.

## **9.6 City Approval**

The City of Columbia CDBG-DR Action Plan was submitted for review and approval of the Columbia City Council on September 6, 2016.

## 10.0 Appendix

### 10.1 Exhibit A – Certification of Controls, Processes, and Procedures



#### City of Columbia CDBG-DR Certifications

- a. The City of Columbia certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG program.
- b. The City of Columbia certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The City of Columbia certifies that the action plan for Disaster Recovery is authorized under State and local law (as applicable) and that the city, and any entity or entities designated by the city, 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 and this notice. The city certifies that activities to be undertaken with funds under this notice are consistent with the approved Action Plan.
- d. The City of Columbia certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this notice.
- e. The City of Columbia certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. The City of Columbia certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each subrecipient carrying out CDBG-DR programs on behalf of the city must follow the approved citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).
- g. The City of Columbia certifies that it is complying with each of the following criteria:
  1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2015 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974

(42 U.S.C. 5121 *et seq.*) related consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.

2. With respect to activities expected to be assisted with CDBG-DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

3. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver published in an applicable Federal Register notice) of the grant amount is expended for activities that benefit such persons.

4. The City of Columbia will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the city certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

- h. The City of Columbia certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations, and that it will affirmatively further fair housing.
- i. The City of Columbia certifies that it has adopted and is enforcing the following policies:
  - 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and
  - 2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- j. The City of Columbia 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 city has reviewed the requirements of this notice and requirements of Public Law 114-113 applicable to funds allocated by this notice, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that it has in place proficient financial controls and procurement processes; that it has adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; that it has to maintain a comprehensive disaster recovery Web site to ensure timely communication of application status to applicants for disaster recovery assistance, and that its implementation plan accurately describes its current capacity and how it will address any capacity gaps.
- k. The City of Columbia certifies that it will not use CDBG-DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the

State, local, or tribal government or delineated as a Special Flood Hazard Area in FEMA's most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

- I. The City of Columbia certifies that its activities concerning lead based paint will comply with the requirements of 24 CFR part 35, subparts A,B,J,K and R.
- m. The City of Columbia certifies that it will comply with all applicable laws.

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Teresa Wilson, City of Columbia City Manager

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Date

## 10.2 Exhibit B – Public Comments



In order to increase public input related to the City of Columbia CDBG-DR Action Plan, the City placed a public notice in *The State* newspaper on August 16, 2016 and posted the CDBG-DR Action Plan to the city's CDBG-DR website on August 19, 2016. Written comments were accepted from August 21, 2016 to September 6, 2016 via the city's website and fax. In addition, public comments from two outreach events have been considered in the development of the plan. As required, the CDBG-DR Action Plan was available in both English and Spanish for review and comment.

As a result of the city's outreach efforts, there were a total of 10 written comments and extensive verbal commentary received for consideration during the preparation and finalization of the Action Plan. These comments with city responses are outlined below.

### ***July 28, 2016 Outreach Event***

The city held a public outreach event on July 28<sup>th</sup> at the Edisto Community Center in the City of Columbia in order to gather public comment during the development of the Action Plan. As a result, the following comments and inquiries were received:

#### **Comment 1:**

**Comment:** One participant inquired about the responsibility of the Corps of Engineers for Gill's Creek and whether the Corps is required to supplement funding available to the city for flood recovery.

**Response:** The Corps of Engineers is a federal agency housed under the Department of Defense which operates independently from the Department of Housing and Urban Development (HUD) and Federal Emergency Management Agency (FEMA). As such, the Corps of Engineers administers a separate allocation of federal funding and independently prioritizes projects for assistance. Although the City of Columbia cannot influence the allocation of funding from the Corps of Engineers, the city commits to partnering with this agency whenever possible in order to maximize the amount of funding that is available for flood recovery.

#### **Comment 2:**

**Comment:** One participant inquired about the entity responsible for allocation of CDBG-DR program funding and the requirement to serve low-to-moderate income households.

**Response:** In order to receive CDBG-DR funding, the City of Columbia conducted an assessment of unmet needs by analyzing data from FEMA and SBA to determine the estimated amount of damages in comparison to recovery assistance provided. The assessment of unmet needs was used to inform the city's allocation strategy which is



designed to maximize the amount of funding available to the greatest number of households as possible. In addition, this allocation strategy also was developed in order to meet the federal requirement that 70% of CDBG-DR funding must benefit low-to-moderate income (LMI) households.

**Comment 3:**

**Comment:** Several participants inquired about the process to apply for federal funding, the final decision on the allocation of CDBG-DR funds, the timing for the release of funds, and prioritization of funding for LMI benefit. Several comments were received stating that many flood damaged homes are not occupied by LMI households and therefore, the most impacted areas are not likely to be addressed.

**Response:** The deadline for the submittal of the Action Plan to HUD is September 20, 2016. Once the Action Plan is submitted, HUD is required to approve the plan or provide feedback within 45 days from receipt of the plan. After approval, the city must complete the environmental review process, finalize program guidelines, conduct intake of program documentation, and determine eligibility of program applicants. For these reasons, it is likely that assistance will not be available until the beginning of 2017. Based upon the allocation strategy in the Action Plan, it can be seen that the city has programmed almost all funding for restoration of damaged housing with the exception of \$200,000 which has been dedicated to leverage EDA funding for businesses impacted by the flood. At this time, FEMA PA funds will be used to address damages to the city's infrastructure.

LMI households will be prioritized for assistance in order to meet the 70% threshold as required in the Federal Register Notice. However, it should be noted that the City of Columbia will closely monitor all CDBG-DR programs in order to assess program performance in meeting a National Objective and will make modifications to program design where necessary to ensure that homeowners with unmet needs are served to the greatest extent possible. In addition, the city may also consider requesting a HUD waiver to lower the LMI requirement once the needs all affected LMI households have been served and as funding remains available.

**Comment 4:**

**Comment:** One participant inquired about the process of addressing abandoned structures in the city.

**Response:** The City of Columbia fully acknowledges this concern and is currently utilizing its existing legal process to address blighted and/or abandoned properties damaged by the flood event. Unfortunately, the code enforcement and condemnation process typically takes 12 months depending upon the circumstances related to each property. This process cannot be shortened due to the legal rights of individual property owners.

**Comment 5:**

**Comment:** One participant inquired about the timing of FEMA HMGP dollars.

**Response:** The deadline to apply for the state's HMGP funds was August 25, 2016. However, the FEMA allocation of HMGP funding is dependent upon the total amount of

damages assessed one year after a natural disaster. Once this determination is made, only 10% of dollars is allocated to the state's share of HMGP funding. Once the allocation of HMGP dollars is known, the state evaluates each jurisdiction's application for assistance and notifies the grantee of the amount available to address recovery needs. At this time, it appears that the State of South Carolina will only receive \$36 million in HMGP funding. This amount will not begin to address the needs of the City of Columbia so applications for assistance will have to be prioritized based upon unmet need. Applicants will be notified once program funds have been approved in order to outline eligibility requirements and approval process.

**Comment 6:**

**Comment:** One participant inquired about the number of properties reported as more than 50% damaged.

**Response:** Based upon FEMA data, there are 192 owner occupied and 138 renter occupied properties reported with "Severe-High" and "Major" damages. These households are the first priority for most CDBG-DR programs outlined in the city's Action Plan for assistance.

**Comment 7:**

**Comment:** One participant inquired about the status of the city's buyout program, next steps to obtain funding, and prioritization of applications. In addition, participants requested guidance on decision making in absence of the availability of program funding and eligibility determinations.

**Response:** Applicants who expressed interest in the city's buyout program will not receive notification until FEMA and/or HUD funding is approved for assistance. Due to the limited amount of funding available, applications for assistance will be prioritized based upon eligibility criteria and level of unmet need. Applicants who have already expressed interest in the FEMA buyout program should have been contacted for an interview to gather necessary documentation. Applicants who have not been contacted should notify the city as soon as possible in order to initiate the qualification process. The prioritization of applications will be based upon the amounts of assistance approved for funding with priority given to those with damaged residences within the floodplain or floodway. In absence of funding information, applicants are encouraged to continue their recovery process but should be aware of eligibility requirements in order to ensure that they do not make themselves ineligible for federal assistance if this is the chosen course of action.

**Comment 8:**

**Comment:** One participant expressed an interest in the funding of secondary homes.

**Response:** Unfortunately, the Federal Register Notice, effective June 22, 2016, specifically states that properties serving as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance, residential incentives, or participation in a CDBG-DR buyout program. "Second homes" are defined in IRS Publication 936 (mortgage interest deductions).

**Comment 9:**

**Comment:** One participant expressed interest in the funding for rental properties that are not a primary residence.

**Response:** The city's proposed Action Plan provides funding for the repair of rental properties meeting the eligibility requirements of Small Rental Repair Program (SRRP). As part of this program, rental properties with four or less units are potentially eligible for assistance. The city has set aside \$6.5 million for the purpose of repairing damaged rental properties and ensuring that sufficient affordable housing is available to tenants who may have been displaced by the flood event.

***August 25, 2016 Outreach Event***

A second outreach event was held on the city's proposed Action Plan on August 25, 2016 at the Drew Wellness Center in Columbia. Approximately 40 citizens were in attendance and received an overview of the Action Plan. In addition, citizens were asked to make public comments and were also provided forms for feedback and commentary. The following comments were expressed by citizens in attendance.

**Comment 10:**

**Comment:** One participant expressed concern about the location of damaged properties within city limits and eligibility of homes annexed by the city after the flood event.

**Response:** It is the city's position that any structure damaged by the flood event which is located in city limits or annexed after the flood event will be eligible for assistance with the exception of those properties that were specifically listed in the city or county's applications for FEMA assistance. As such, the City of Columbia has the responsibility to ensure that properties participating in city programs are not also participating in the county programs designed for the same purpose. For this reason, the city will enter into an agreement with Richland County to conduct Duplication of Benefit analysis for properties applying for both CDBG-DR and FEMA assistance. Applicants will be provided assistance in accordance with the city's agreement with Richland County.

**Comment 11:**

**Comment:** One participant inquired about the prioritization of applications and whether or not the CDBG-DR funding is provided in the form of a grant or a loan.

**Response:** With the exception of the Small Rental Repair Program (SRRP) and EDA Loan Capitalization Program, CDBG-DR funds will be provided in the form of grants to the applicant. SRRP funding will be provided as a Forgivable Deferred Loan (FDL) with repayment not being required unless affordability requirements are not met during the terms of the loan agreement. EDA Loan Capitalization funds will also be provided in the form of a loan based upon the city's standard underwriting criteria.

**Comment 12:**

**Comment:** Concern was raised regarding the availability of funding for "double units". One participant requested a clarification of this eligibility requirement.

**Response:** The term “double unit” refers to a structure that is commonly known as a “Duplex” or structure with two units. The city will revise the Action Plan to refer to these unit types as a “Duplex”. Duplex units are eligible for participation in the Homeowner Assistance Program, Buyout, Small Rental Repair, and Minor Repair Programs

**Comment 13:**

**Comment:** Several participants expressed concern regarding the contactor qualification and selection process. In addition, participants wanted clarification regarding construction monitoring, contractor payments, and fraud.

**Response:** The City of Columbia will pre-qualify all contractors that are permitted to bid on CDBG-DR housing rehabilitation and reconstruction projects. As part of this process the city will ensure that contractors are appropriately licensed, bonded, and have not been debarred from work on federally funded projects. While the city will bid out each project to a pre-approved list of contractors, the applicant will be able to select the contractor based upon program guidelines. It is the city’s position that the pre-qualification of contractors and bid process will eliminate price gouging activities. If price gouging, collusion, or fraud among contractors is suspected, the city will refer the case to the appropriate investigative and law enforcement agencies as necessary. Any contractor who receives complaints regarding shoddy work and/or is suspected of fraudulent activities will be disqualified from participating in all CDBG-DR related projects. It should be noted that the City of Columbia requires a minimum of a one-year warranty to homeowners for all work conducted as part of CDBG-DR recovery programs. Therefore, the homeowner will have one year to request the repair/correction of any work that does not meet program specifications. The city will notify the homeowner of warranty timeframes upon completion of construction, at 6 months, and one month prior to the expiration of the warranty in order to ensure that all claims are processed and completed in a timely manner. In addition, the applicant can also file a complaint at any time during the construction process or warranty period in accordance with the City of Columbia Grievance Procedures.

Payments will be released to contractors as work is completed and inspected by the city’s construction monitors. Once all work is complete, the applicant will be notified and asked to acknowledge the completion of work.

**Comment 14:**

**Comment:** One participant inquired whether or not landlords will be “vetted” or pre-qualified for participation in the Small Rental Repair Program (SRRP) so that tenants are not unduly burdened with additional program requirements.

**Response:** All applicants in the Small Rental Repair Program (SRRP) will be required to meet program requirements and must sign grant agreements regarding their responsibilities. Any landlord who will not agree to SRRP terms and conditions to include affordability requirements will be ineligible for participation in the city’s CDBG-DR programs. In no case, will landlord responsibilities be delegated to the tenant beyond the requirement of reporting updated demographic and income data upon re-occupancy of a rehabilitated or reconstructed unit. All tenants will be advised of their URA rights and city’s

grievance procedures during the application intake process. It is the city's goal to minimize the temporary relocation and/or permanent displacement of tenants residing in units included as part of this CDBG-DR program.

**Comment 15:**

**Comment:** One participant requested clarification of the six-year program requirement.

**Response:** The six-year timeframe discussed during the CDBG-DR Action Plan presentation refers to the length of time that the City of Columbia has to complete all program activities once a grant agreement with HUD is approved. There are no six-year requirements for program applicants. However, there is a required affordability period for all applicants receiving funding from the SRRP program in order to ensure that affordable rental properties remain available to low-to-moderate income households for a period of 7 years. Funding for rental properties assisted as part of this program will be provided in the form of a Forgivable Deferred Loan (FDL) for the term of the grant agreement.

**Comment 16:**

**Comment:** One participant inquired whether or not projects could be funded based upon area benefit rather than individual household incomes. In addition, the participant requested clarification regarding income limits and determinations.

**Response:** CDBG-DR funding provided for the repair or reconstruction of damaged residential units must be qualified/documentated by verifying the individual household income of each beneficiary. Income limits are adjusted annually by HUD and vary by household size.

**Comment 17:**

**Comment:** One applicant asked if affected businesses had to register with "211" in order to be eligible for the city's EDA Loan Capitalization Fund.

**Response:** At this time, registration with "211" is not a program requirement as outlined in the proposed Action Plan. However, the City of Columbia has not fully developed program eligibility requirements and methods of prioritization. Once launched, applicants for this program will be fully informed of all requirements.

**Comment 18:**

**Comment:** One participant inquired about whether or not funding for the Small Rental Repair Program (SRRP) will be provided in the form of a grant or a loan.

**Response:** CDBG-DR funding for the SRRP will be provided in the form of a Forgivable Deferred Loan (FDL) for the term established in the applicant's grant agreement which will require a seven- year affordability period for the rental unit. Funds will be pro-rated and forgiven (with no repayment required) on an annual basis as long as the terms of the loan agreement are met.

**Comment 19:**

**Comment:** One participant inquired whether or not damages to churches was considered during the allocation process.

**Response:** The City of Columbia's CDBG-DR allocation was based upon available FEMA and SBA data as it relates to greatest unmet needs of the community. As direct assistance to churches is typically not eligible, with the exception of certain public services, funding for this type of activity was not included in the allocation of funding.

**Comment 20:**

**Comment:** One participant requested that the city justify the allocation of funding for the benefit of low-to-moderate income households and inquired whether or not funding was limited to LMI households.

**Response:** Based upon the Federal Register Notice, the city was required to allocate 70% of all program funding toward the benefit to low-to-moderate income households. For this reason, the CDBG-DR allocation strategy is specifically targeted to serving the most vulnerable households in the city in order to meet this federal requirement. However, several programs have been developed in order to address the unmet needs of households with incomes above 80% of AMI. Programs may be expanded as funding becomes available and/or a waiver is obtained from HUD.

**Comment 21:**

**Comment:** One participant inquired whether or not program funding was available for multi-family housing.

**Response:** The city's Small Rental Repair Program (SRRP) is limited to structures containing four or less units.

**Comment 22:**

**Comment:** Assistance should be made available for people who need help in navigating recovery programs.

**Response:** The City of Columbia continues to work with FEMA, American Red Cross, Richland-Lexington Counties Long Term Recovery Group (RL-LTRG) and Hearts and Hands organization to ensure that affected citizens receive case management and support in order to effectively navigate all available recovery resources. In addition, the city's Pre-Award Implementation Plan includes staffing and funding for case management services to be provided for each CDBG-DR housing program.

**Comment 23:**

**Comment:** One participant inquired about obtaining information on Richland County's Action Plan. In addition, the participant wanted to know why the Action Plans for the state county, and city are not the same.



**Response:** The Richland County Action Plan was made available for public comment on August 26, 2016 and was posted to the county's website. Any comments should be submitted to the county for review and response.

Although there has been close coordination between governmental agencies, the City of Columbia Action Plan differs from those of the state and Richland County. These differences can be attributed to the separate allocation of dollars to each entity and the requirement to ensure that CDBG-DR funding is specifically tied to the unmet needs of the community.

**Comment 24:**

**Comment:** One participant inquired whether or not everyone affected by the storm will be assisted. If not, the participant asked the city to advise those who may not be assisted.

**Response:** The CDBG-DR allocation of \$19 million is not enough to address approximately \$47.5 million in unmet needs within the community. For this reason, the city had to prioritize assistance to the most vulnerable populations: low-to-moderate income, elderly, and disabled. However, all property owners who may be eligible for assistance should apply for the city's programs in the event that additional funding should become available or changes to the program are made in order to accommodate a larger pool of applicants. Owners of properties damaged by the storm who may not be assisted are strongly encouraged to avail themselves of other programs such as SBA or HUD 203H loan programs which provide low interest disaster loans. In addition, there are non-profits available such as St. Bernard Project and Hearts and Hands that can provide assistance or direct owners to other available assistance provided by local non-profit organizations.

**Comment 25:**

**Comment:** One participant inquired about the necessity to allocate funding for administrative and program delivery costs.

**Response:** In order to effectively administer CDBG-DR programs, the city must hire additional program staff to process program applications, make eligibility and benefit determinations, and monitor construction. Although the city is permitted 5% for administration and 15% for planning, less than 10% has been allocated for this purpose.

**Comment 26:**

**Comment:** Due to the limited funding available, properties in flood prone areas should be prioritized for the buyout program.

**Response:** The city concurs with this comment. Current eligibility requirements include the location of the property in a floodplain or floodway in order to be eligible for participation in the buyout program.

**Comment 27:**

**Comment:** One participant inquired whether or not CDBG-DR are funds available for the replacement of automobiles.

**Response:** The replacement of automobiles damaged by the storm is not an eligible expense for CDBG-DR funding.

**Comment 28:**

**Comment:** One participant inquired about the timeframe for notifying affected households whether or not they will be eligible or receive program funding.

**Response:** At this time, the city is in the process of applying for FEMA funds and submitting the Action Plan for CDBG-DR funding so it is difficult to estimate the timeframe and the amount of funding that will be available. Based upon the current CDBG-DR Action Plan approval process, it is likely that these dollars will be available for eligible households by the beginning of 2017.

**Comment 29:**

**Comment:** One participant inquired about need for assistance with mold remediation due to deteriorating conditions in their home and health issues.

**Response:** Due to the severity of the situation and immediate health concerns, this applicant was referred to Hearts and Hands (present at the meeting), in order to obtain emergency assistance with mold remediation.

***Written Comments***

In addition to verbal comments received at public outreach events, there were a total of 6 written responses received from affected homeowners submitted in conjunction with the outreach events. In their written comments each homeowner described the level of damage to their home and the need for assistance.

**Comment 30:**

**Comment:** One homeowner specifically stated that the policy making 70% of funding available to LMI households does not address the most impacted areas. In addition, the homeowner also inquired whether or not that the city had considered any lawsuits that may follow as a result of the storm water damage.

**Response:** The City of Columbia will closely monitor all CDBG-DR programs in order to assess performance in meeting a National Objective and will make modifications to program design where necessary to ensure that homeowners with unmet needs are served to the greatest extent possible. In addition, the city may also consider requesting a HUD waiver to lower the LMI requirement once the needs all affected LMI households have been served and as funding remains available.

At this time, there have not been any lawsuits filed as a result of storm water related damages.

In addition to comments received as part of the city's outreach efforts, 4 comments were received via the city's CDBG-DR website or fax.

**Comment 31:**

**Comment:** One comment received from a renter expressed interest in the availability of funding for roads, homes and cars with the caveat that citizens of Columbia were also experiencing stress which needed to be addressed by the city.

**Response:** The City of Columbia is committed to providing assistance to all affected citizens to the greatest extent possible. As such, the city continues to work with FEMA, American Red Cross, Richland-Lexington Counties Long Term Recovery Group (RL-LTRG) and Hearts and Hands organization so that all unmet needs including mental health support is available for all flood victims. In addition, the city's Pre-Award Implementation Plan includes case management staffing to assist affected households during the CDBG-DR funding process.

**Comment 32:**

**Comment:** South Carolina Legal Services (SCLS) commented that the most effective use of program funding is for housing rehabilitation, reconstruction, and buyout. In addition, SCLS recommends the use of funds for the repair or replacement of infrastructure. SCLS also submitted a list of recommendations to be considered during the design of the City of Columbia recovery programs.

**Response:** The City of Columbia concurs with SCLS that the most effective use of CDBG-DR funding is the restoration of the city's housing stock that was damaged by the October 2015 flood event. In addition, the city recognizes the need for the repair and replacement of critical infrastructure which was damaged by the flood. At this time, the city intends to use funding from the Federal Emergency Management Agency (FEMA) in order to address these needs. The city also appreciates and will consider the recommendations made by SCLS for the design of the city's programs.

**Comment 33:**

**Comment:** AmeriCorps VISTA submitted a comment requesting to meet with city officials in order to increase resiliency among low income populations

**Response:** The City of Columbia is committed to improving resiliency for all citizens affected by the October 2015 flood to include the most vulnerable populations. For this reason, the city will be providing reimbursement for home elevation and implementing Green Building Standards in all CDBG-DR programs. The city looks forward to working with AmeriCorps VISTA during the implementation of its CDBG-DR housing programs.

**Comment 34:**

**Comment:** An owner of a secondary home that was damaged in the October 2015 flood event has requested that the city utilize Section 6.4 of the Action Plan related to Action Plan Amendments to address the eligibility of the secondary home.

**Response:** Unfortunately, the Federal Register Notice, effective June 22, 2016, specifically states that properties serving as second homes at the time of the disaster, or following the disaster, are not eligible for rehabilitation assistance, residential incentives, or participation in a CDBG-DR buyout program. "Second homes" are defined in IRS Publication 936 (mortgage interest deductions).

**Comment 35:**

**Comment:** One resident of Columbia suggested sidewalk and lighting improvements to Muller Avenue in order to increase the safety of area residents.

**Response:** While CDBG-DR funding must directly correlate to damages resulting from the October 2015 flood event, the City of Columbia takes all public commentary into account and will consider these public improvements as part of normal city operations.

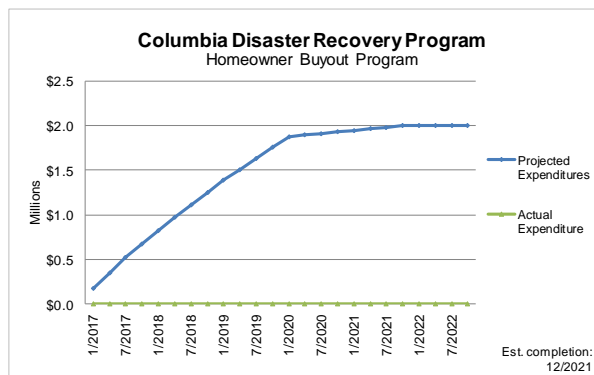
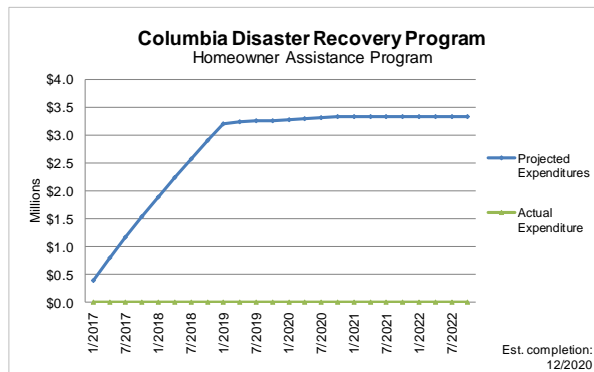
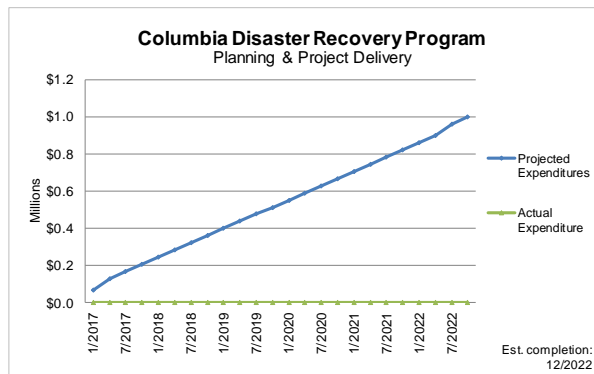
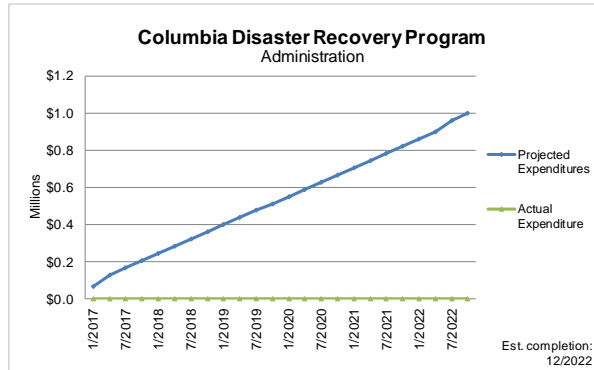
**Comment 36:**

**Comment:** Operation Hope, Inc. requested a letter of support from the city in order to assist families and businesses affected by the October 2015 flood event.

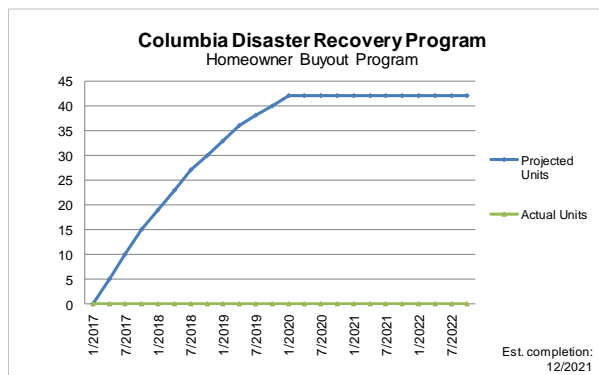
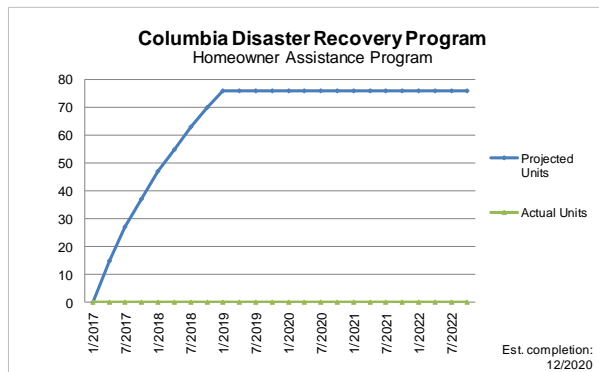
**Response:** The City of Columbia appreciates the support of all agencies who have supported the city's flood recovery efforts. As such, the city looks forward to working with Operation HOPE in conjunction with EDA in order to assist affected households and businesses.

## 10.3 Exhibit C – CDBG-DR Expenditure Projections

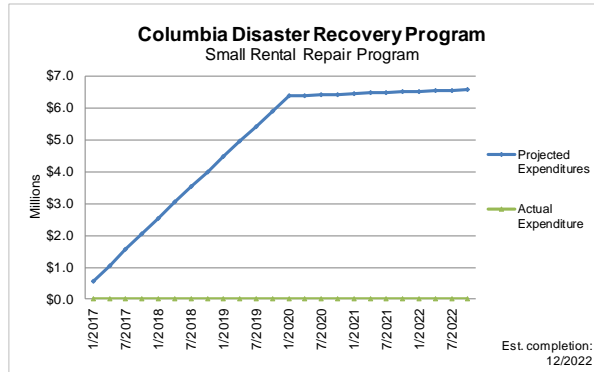
### Financial



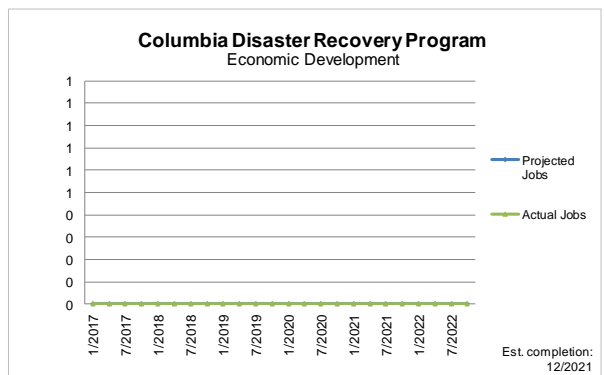
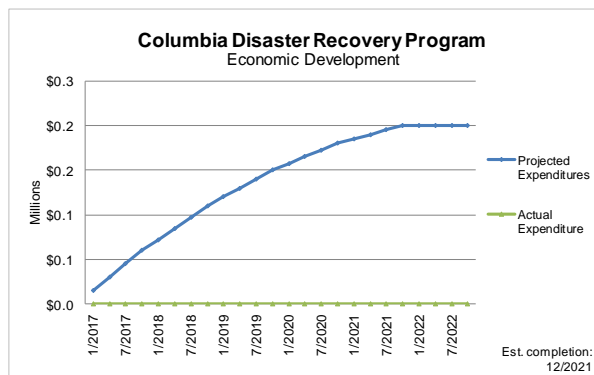
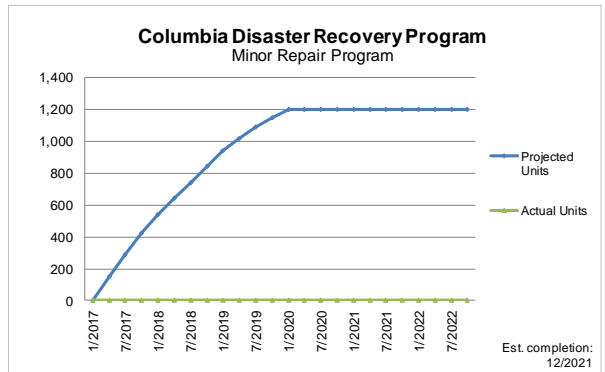
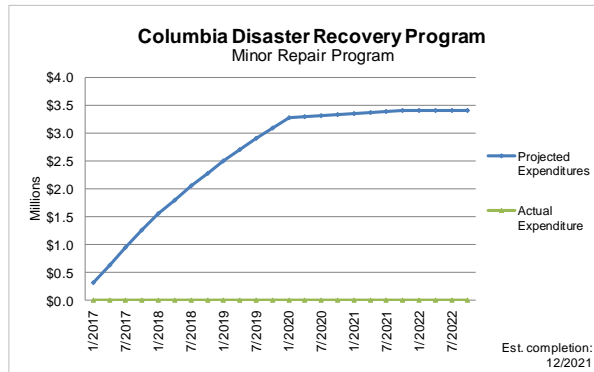
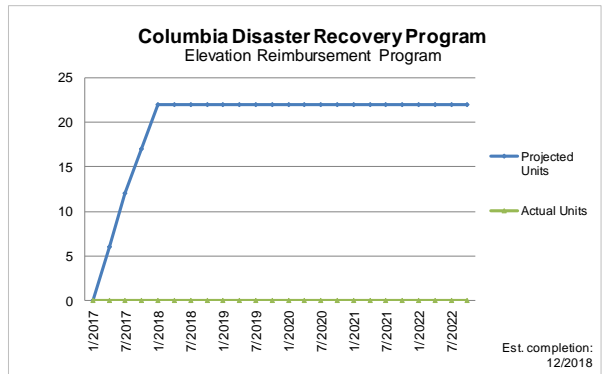
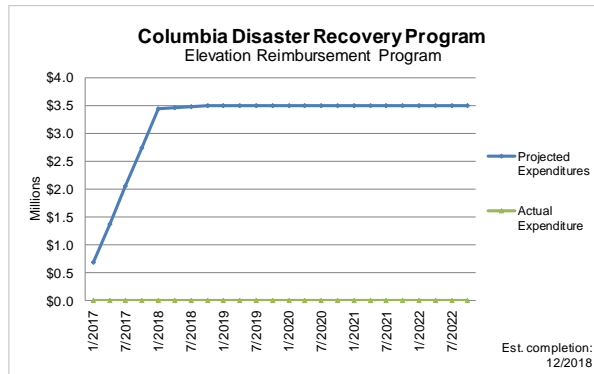
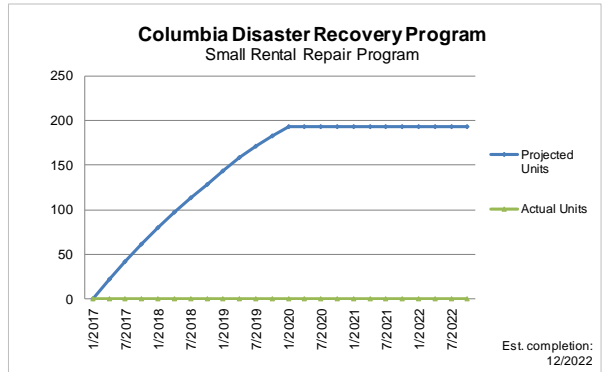
### Performance



## Financial



## Performance





## Financial Projections

Administration	Year 1				Year 2			
Allocation: \$999,450	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$70,000	\$130,000	\$168,470	\$206,940	\$245,410	\$283,880	\$322,350	\$360,820
Quarterly Projection	\$70,000	\$60,000	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Planning & Project Delivery	Year 1				Year 2			
Allocation: \$999,450	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$70,000	\$130,000	\$168,470	\$206,940	\$245,410	\$283,880	\$322,350	\$360,820
Quarterly Projection	\$70,000	\$60,000	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Homeowner Assistance Program	Year 1				Year 2			
Allocation: \$3,336,150	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$400,000	\$800,000	\$1,175,000	\$1,550,000	\$1,900,000	\$2,250,000	\$2,575,000	\$2,900,000
Quarterly Projection	\$400,000	\$400,000	\$375,000	\$375,000	\$350,000	\$350,000	\$325,000	\$325,000
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Homeowner Buyout Program	Year 1				Year 2			
Allocation: \$2,000,000	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$175,000	\$350,000	\$525,000	\$675,000	\$825,000	\$975,000	\$1,115,000	\$1,255,000
Quarterly Projection	\$175,000	\$175,000	\$175,000	\$150,000	\$150,000	\$150,000	\$140,000	\$140,000
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Small Rental Repair Program	Year 1				Year 2			
Allocation: \$6,565,270	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$550,000	\$1,050,000	\$1,550,000	\$2,050,000	\$2,550,000	\$3,050,000	\$3,525,000	\$4,000,000
Quarterly Projection	\$550,000	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	\$475,000	\$475,000
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Elevation Reimbursement Program	Year 1				Year 2			
Allocation: \$3,490,000	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$687,500	\$1,375,000	\$2,062,500	\$2,750,000	\$3,437,500	\$3,455,000	\$3,472,500	\$3,490,000
Quarterly Projection	\$687,500	\$687,500	\$687,500	\$687,500	\$687,500	\$17,500	\$17,500	\$17,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Minor Repair Program	Year 1				Year 2			
Allocation: \$3,398,680	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$325,000	\$640,000	\$955,000	\$1,255,000	\$1,555,000	\$1,805,000	\$2,055,000	\$2,280,000
Quarterly Projection	\$325,000	\$315,000	\$315,000	\$300,000	\$300,000	\$250,000	\$250,000	\$225,000
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Economic Development	Year 1				Year 2			
Allocation: \$200,000	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$15,000	\$30,000	\$45,000	\$60,000	\$72,500	\$85,000	\$97,500	\$110,000
Quarterly Projection	\$15,000	\$15,000	\$15,000	\$15,000	\$12,500	\$12,500	\$12,500	\$12,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Total Expenditures	Year 1				Year 2			
Allocation: \$20,989,000	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Expenditures	\$2,292,500	\$4,505,000	\$6,649,440	\$8,753,880	\$10,830,820	\$12,187,760	\$13,484,700	\$14,756,640
Quarterly Projection	\$2,292,500	\$2,212,500	\$2,144,440	\$2,104,440	\$2,076,940	\$1,356,940	\$1,296,940	\$1,271,940
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

## Financial Projections Continued

Administration	Year 3				Year 4			
Allocation: \$999,450	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$399,290	\$437,760	\$476,230	\$514,700	\$553,170	\$591,640	\$630,110	\$668,580
Quarterly Projection	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Planning & Project Delivery	Year 3				Year 4			
Allocation: \$999,450	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$399,290	\$437,760	\$476,230	\$514,700	\$553,170	\$591,640	\$630,110	\$668,580
Quarterly Projection	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Homeowner Assistance Program	Year 3				Year 4			
Allocation: \$3,336,150	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$3,200,000	\$3,231,150	\$3,248,650	\$3,266,150	\$3,283,650	\$3,301,150	\$3,318,650	\$3,336,150
Quarterly Projection	\$300,000	\$31,150	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Homeowner Buyout Program	Year 3				Year 4			
Allocation: \$2,000,000	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$1,385,000	\$1,510,000	\$1,635,000	\$1,760,000	\$1,877,500	\$1,895,000	\$1,912,500	\$1,930,000
Quarterly Projection	\$130,000	\$125,000	\$125,000	\$125,000	\$117,500	\$17,500	\$17,500	\$17,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Small Rental Repair Program	Year 3				Year 4			
Allocation: \$6,565,270	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$4,475,000	\$4,950,000	\$5,425,000	\$5,900,000	\$6,372,770	\$6,390,270	\$6,407,770	\$6,425,270
Quarterly Projection	\$475,000	\$475,000	\$475,000	\$475,000	\$472,770	\$17,500	\$17,500	\$17,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Elevation Reimbursement Program	Year 3				Year 4			
Allocation: \$3,490,000	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000
Quarterly Projection	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Minor Repair Program	Year 3				Year 4			
Allocation: \$3,398,680	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$2,505,000	\$2,705,000	\$2,905,000	\$3,090,000	\$3,275,000	\$3,293,680	\$3,311,180	\$3,328,680
Quarterly Projection	\$225,000	\$200,000	\$200,000	\$185,000	\$185,000	\$18,680	\$17,500	\$17,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Economic Development	Year 3				Year 4			
Allocation: \$200,000	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$120,000	\$130,000	\$140,000	\$150,000	\$157,500	\$165,000	\$172,500	\$180,000
Quarterly Projection	\$10,000	\$10,000	\$10,000	\$10,000	\$7,500	\$7,500	\$7,500	\$7,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Total Expenditures	Year 3				Year 4			
Allocation: \$20,989,000	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Expenditures	\$15,973,580	\$16,891,670	\$17,796,110	\$18,685,550	\$19,562,760	\$19,718,380	\$19,872,820	\$20,027,260
Quarterly Projection	\$1,216,940	\$918,090	\$904,440	\$889,440	\$877,210	\$155,620	\$154,440	\$154,440
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

## Financial Projections Continued

Administration	Year 5				Year 6			
Allocation: \$999,450	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$707,050	\$745,520	\$783,990	\$822,460	\$860,930	\$899,450	\$959,450	\$999,450
Quarterly Projection	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,520	\$60,000	\$40,000
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Planning & Project Delivery	Year 5				Year 6			
Allocation: \$999,450	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$707,050	\$745,520	\$783,990	\$822,460	\$860,930	\$899,450	\$959,450	\$999,450
Quarterly Projection	\$38,470	\$38,470	\$38,470	\$38,470	\$38,470	\$38,520	\$60,000	\$40,000
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Homeowner Assistance Program	Year 5				Year 6			
Allocation: \$3,336,150	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$3,336,150	\$3,336,150	\$3,336,150	\$3,336,150	\$3,336,150	\$3,336,150	\$3,336,150	\$3,336,150
Quarterly Projection	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Homeowner Buyout Program	Year 5				Year 6			
Allocation: \$2,000,000	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$1,947,500	\$1,965,000	\$1,982,500	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000
Quarterly Projection	\$17,500	\$17,500	\$17,500	\$17,500	\$0	\$0	\$0	\$0
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Small Rental Repair Program	Year 5				Year 6			
Allocation: \$6,565,270	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$6,442,770	\$6,460,270	\$6,477,770	\$6,495,270	\$6,512,770	\$6,530,270	\$6,547,770	\$6,565,270
Quarterly Projection	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Elevation Reimbursement Program	Year 5				Year 6			
Allocation: \$3,490,000	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000	\$3,490,000
Quarterly Projection	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Minor Repair Program	Year 5				Year 6			
Allocation: \$3,398,680	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$3,346,180	\$3,363,680	\$3,381,180	\$3,398,680	\$3,398,680	\$3,398,680	\$3,398,680	\$3,398,680
Quarterly Projection	\$17,500	\$17,500	\$17,500	\$17,500	\$0	\$0	\$0	\$0
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Economic Development	Year 5				Year 6			
Allocation: \$200,000	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$185,000	\$190,000	\$195,000	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000
Quarterly Projection	\$5,000	\$5,000	\$5,000	\$5,000	\$0	\$0	\$0	\$0
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)								

Total Expenditures	Year 5				Year 6			
Allocation: \$20,989,000	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Expenditures	\$20,161,700	\$20,296,140	\$20,430,580	\$20,565,020	\$20,659,460	\$20,754,000	\$20,891,500	\$20,989,000
Quarterly Projection	\$134,440	\$134,440	\$134,440	\$134,440	\$94,440	\$94,540	\$137,500	\$97,500
Actual Expenditure	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Actual Quarterly Expend (from QPRs)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

## Performance Projections

Homeowner Assistance Program	Year 1				Year 2			
Households: 76	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Units	0	15	27	37	47	55	63	70
# of Housing Units (Quarterly Projection)	0	15	12	10	10	8	8	7
Actual Units	0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)								

Homeowner Buyout Program	Year 1				Year 2			
Households: 42	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Units	0	5	10	15	19	23	27	30
# of Housing Units (Quarterly Projection)	0	5	5	5	4	4	4	3
Actual Units	0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)								

Small Rental Repair Program	Year 1				Year 2			
Households: 193	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Units	0	22	42	62	80	98	114	129
# of Housing Units (Quarterly Projection)	0	22	20	20	18	18	16	15
Actual Units	0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)								

Elevation Reimbursement Program	Year 1				Year 2			
Households: 22	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Units	0	6	12	17	22	22	22	22
# of Housing Units (Quarterly Projection)	0	6	6	5	5			
Actual Units	0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)								

Minor Repair Program	Year 1				Year 2			
Households: 1,198	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Units	0	150	290	420	540	640	740	840
# of Housing Units (Quarterly Projection)	0	150	140	130	120	100	100	100
Actual Units	0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)								

Economic Development	Year 1				Year 2			
Jobs:	1/2017	4/2017	7/2017	10/2017	1/2018	4/2018	7/2018	10/2018
Projected Jobs	0	0	0	0	0	0	0	0
# of Jobs Created/Retained (Quarterly Projection)								
Actual Jobs	0	0	0	0	0	0	0	0
# of Permanent Jobs Created								
# of Permanent Jobs Retained								

## Performance Projections Continued

Homeowner Assistance Program		Year 3				Year 4			
Households: 76		1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Units		76	76	76	76	76	76	76	76
# of Housing Units (Quarterly Projection)		6							
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Homeowner Buyout Program		Year 3				Year 4			
Households: 42		1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Units		33	36	38	40	42	42	42	42
# of Housing Units (Quarterly Projection)		3	3	2	2	2			
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Small Rental Repair Program		Year 3				Year 4			
Households: 193		1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Units		144	159	171	183	193	193	193	193
# of Housing Units (Quarterly Projection)		15	15	12	12	10			
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Elevation Reimbursement Program		Year 3				Year 4			
Households: 22		1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Units		22	22	22	22	22	22	22	22
# of Housing Units (Quarterly Projection)									
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Minor Repair Program		Year 3				Year 4			
Households: 1,198		1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Units		940	1,015	1,090	1,148	1,198	1,198	1,198	1,198
# of Housing Units (Quarterly Projection)		100	75	75	58	50			
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Economic Development		Year 3				Year 4			
Jobs:		1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Projected Jobs		0	0	0	0	0	0	0	0
# of Jobs Created/Retained (Quarterly Projection)									
Actual Jobs		0	0	0	0	0	0	0	0
# of Permanent Jobs Created									
# of Permanent Jobs Retained									

## Performance Projections Continued

Homeowner Assistance Program		Year 5				Year 6			
Households: 76		1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Units		76	76	76	76	76	76	76	76
# of Housing Units (Quarterly Projection)									
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Homeowner Buyout Program		Year 5				Year 6			
Households: 42		1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Units		42	42	42	42	42	42	42	42
# of Housing Units (Quarterly Projection)									
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Small Rental Repair Program		Year 5				Year 6			
Households: 193		1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Units		193	193	193	193	193	193	193	193
# of Housing Units (Quarterly Projection)									
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Elevation Reimbursement Program		Year 5				Year 6			
Households: 22		1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Units		22	22	22	22	22	22	22	22
# of Housing Units (Quarterly Projection)									
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Minor Repair Program		Year 5				Year 6			
Households: 1,198		1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Units		1,198	1,198	1,198	1,198	1,198	1,198	1,198	1,198
# of Housing Units (Quarterly Projection)									
Actual Units		0	0	0	0	0	0	0	0
# of Housing Units (Populated from QPR Reporting)									

Economic Development		Year 5				Year 6			
Jobs:		1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Projected Jobs		0	0	0	0	0	0	0	0
# of Jobs Created/Retained (Quarterly Projection)		0	0	0	0	0	0	0	0
Actual Jobs		0	0	0	0	0	0	0	0
# of Permanent Jobs Created									
# of Permanent Jobs Retained									



## 10.4 Exhibit D – SF-424 Form and Checklists

OMB Number: 4040-0004  
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424																											
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision  * If Revision, select appropriate letter(s): <input type="text"/>  * Other (Specify): <input type="text"/>																									
* 3. Date Received: <input style="background-color: yellow;" type="text"/>		4. Applicant Identifier: <input type="text" value="B-16-MH-45-001"/>																									
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>																									
<b>State Use Only:</b>																											
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>																									
<b>8. APPLICANT INFORMATION:</b>																											
* a. Legal Name: <input type="text" value="City of Columbia"/>																											
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="57-6000229"/>		* c. Organizational DUNS: <input type="text" value="0737073660000"/>																									
<b>d. Address:</b>																											
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; border-right: 1px solid black; padding: 2px;">* Street1:</td> <td style="padding: 2px;"><input type="text" value="1225 Lady Street"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">Street2:</td> <td style="padding: 2px;"><input type="text" value="P.O. Box 147"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">* City:</td> <td style="padding: 2px;"><input type="text" value="Columbia"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">County/Parish:</td> <td style="padding: 2px;"><input type="text" value="Richland"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">* State:</td> <td style="padding: 2px;"><input type="text" value="SC: South Carolina"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">Province:</td> <td style="padding: 2px;"><input type="text"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">* Country:</td> <td style="padding: 2px;"><input type="text" value="USA: UNITED STATES"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">* Zip / Postal Code:</td> <td style="padding: 2px;"><input style="border: 2px solid red;" type="text" value="29217"/></td> </tr> </table>				* Street1:	<input type="text" value="1225 Lady Street"/>	Street2:	<input type="text" value="P.O. Box 147"/>	* City:	<input type="text" value="Columbia"/>	County/Parish:	<input type="text" value="Richland"/>	* State:	<input type="text" value="SC: South Carolina"/>	Province:	<input type="text"/>	* Country:	<input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code:	<input style="border: 2px solid red;" type="text" value="29217"/>								
* Street1:	<input type="text" value="1225 Lady Street"/>																										
Street2:	<input type="text" value="P.O. Box 147"/>																										
* City:	<input type="text" value="Columbia"/>																										
County/Parish:	<input type="text" value="Richland"/>																										
* State:	<input type="text" value="SC: South Carolina"/>																										
Province:	<input type="text"/>																										
* Country:	<input type="text" value="USA: UNITED STATES"/>																										
* Zip / Postal Code:	<input style="border: 2px solid red;" type="text" value="29217"/>																										
<b>e. Organizational Unit:</b>																											
Department Name: <input type="text" value="Community Development"/>		Division Name: <input type="text" value="Community Development"/>																									
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>																											
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; border-right: 1px solid black; padding: 2px;">Prefix:</td> <td style="padding: 2px;"><input type="text" value="Ms."/></td> <td style="width: 15%; border-right: 1px solid black; padding: 2px;">* First Name:</td> <td style="padding: 2px;"><input type="text" value="Gloria"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">Middle Name:</td> <td style="padding: 2px;"><input type="text" value="J."/></td> <td style="border-right: 1px solid black; padding: 2px;">* Last Name:</td> <td style="padding: 2px;"><input type="text" value="Saeed"/></td> </tr> <tr> <td style="border-right: 1px solid black; padding: 2px;">Suffix:</td> <td style="padding: 2px;"><input type="text"/></td> <td style="border-right: 1px solid black; padding: 2px;">Title:</td> <td style="padding: 2px;"><input type="text" value="Interim Director"/></td> </tr> <tr> <td colspan="4" style="padding: 2px;">Organizational Affiliation: <input type="text"/></td> </tr> <tr> <td colspan="2" style="padding: 2px;">* Telephone Number: <input type="text" value="803-545-3766"/></td> <td colspan="2" style="padding: 2px;">Fax Number: <input type="text" value="803-545-255-8912"/></td> </tr> <tr> <td colspan="4" style="padding: 2px;">* Email: <input type="text" value="gjsaeed@columbiasc.net"/></td> </tr> </table>				Prefix:	<input type="text" value="Ms."/>	* First Name:	<input type="text" value="Gloria"/>	Middle Name:	<input type="text" value="J."/>	* Last Name:	<input type="text" value="Saeed"/>	Suffix:	<input type="text"/>	Title:	<input type="text" value="Interim Director"/>	Organizational Affiliation: <input type="text"/>				* Telephone Number: <input type="text" value="803-545-3766"/>		Fax Number: <input type="text" value="803-545-255-8912"/>		* Email: <input type="text" value="gjsaeed@columbiasc.net"/>			
Prefix:	<input type="text" value="Ms."/>	* First Name:	<input type="text" value="Gloria"/>																								
Middle Name:	<input type="text" value="J."/>	* Last Name:	<input type="text" value="Saeed"/>																								
Suffix:	<input type="text"/>	Title:	<input type="text" value="Interim Director"/>																								
Organizational Affiliation: <input type="text"/>																											
* Telephone Number: <input type="text" value="803-545-3766"/>		Fax Number: <input type="text" value="803-545-255-8912"/>																									
* Email: <input type="text" value="gjsaeed@columbiasc.net"/>																											

<b>Application for Federal Assistance SF-424</b>
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> C: City or Township Government
<b>Type of Applicant 2: Select Applicant Type:</b> 
<b>Type of Applicant 3: Select Applicant Type:</b> 
<b>* Other (specify):</b> 
<b>* 10. Name of Federal Agency:</b> U.S. Department of Housing and Urban Development
<b>11. Catalog of Federal Domestic Assistance Number:</b> 14-228 <b>CFDA Title:</b> Community Development Block Grant Disaster Recovery (CDBG-DR)
<b>* 12. Funding Opportunity Number:</b> FR-5938-N-01 <b>* Title:</b> Allocation, Common Application, Waivers, and Alternative Requirements for Community Development Block Grant (CDBG) Disaster Recovery Grantee Under Transportation, Housing and Urban Development and Related Agencies Appropriation Act, 2016. PL-114-113
<b>13. Competition Identification Number:</b>  <b>Title:</b> 
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <div><input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></div>
<b>* 15. Descriptive Title of Applicant's Project:</b> City of Columbia Community Development Block Grant Disaster Recovery (CDBG-DR) Program
Attach supporting documents as specified in agency instructions. <div><input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/></div>

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <input style="width: 100px;" type="text" value="SC-002"/>	* b. Program/Project <input style="width: 100px;" type="text" value="SC-002"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input style="width: 150px;" type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input style="width: 100px;" type="text" value="11/04/2016"/>	* b. End Date: <input style="width: 100px;" type="text" value="11/04/2022"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input style="width: 150px;" type="text" value="19,989,000.00"/>
* b. Applicant	<input style="width: 150px;" type="text"/>
* c. State	<input style="width: 150px;" type="text"/>
* d. Local	<input style="width: 150px;" type="text"/>
* e. Other	<input style="width: 150px;" type="text"/>
* f. Program Income	<input style="width: 150px;" type="text" value="1,000,000.00"/>
* g. TOTAL	<input style="width: 150px;" type="text" value="20,989,000.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input style="width: 100px;" type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input style="width: 150px;" type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</b> <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input style="width: 100px;" type="text" value="Ms."/>	* First Name: <input style="width: 200px;" type="text" value="Teresa"/>
Middle Name: <input style="width: 200px;" type="text" value="B."/>	
* Last Name: <input style="width: 250px;" type="text" value="Wilson"/>	
Suffix: <input style="width: 100px;" type="text"/>	
* Title: <input style="width: 300px;" type="text" value="City Manager"/>	
* Telephone Number: <input style="width: 150px;" type="text" value="803-545-3026"/>	Fax Number: <input style="width: 150px;" type="text" value="803-545-3051"/>
* Email: <input style="width: 300px;" type="text" value="tbwilson@columbiasc.ent"/>	
* Signature of Authorized Representative:	* Date Signed: <input style="width: 100px;" type="text" value="9-16-2016"/>

**Community Development Block Grant (CDBG) Disaster Recovery**  
**Transportation, Housing and Urban Development and Related Agencies Appropriations Act, 2016 (P.L. 114-113)**

**Initial Action Plan Review**

Grantee: **City of Columbia, South Carolina**

State or Entitlement: **Entitlement**

Date Plan Re-Submitted: **12/21/2016**

Entity Designated to Administer the Funds: **City of Columbia Community Development Dept**

Date Plan Reviewed:

Amount of Funds Allocated in Plan: **\$19,989,000**

Submitted within 90 days of Federal

Reviewer/Title: **Gloria Saeed, Interim Director, City of Columbia Community Development**

Register Notice? **Yes**

Criteria:		Yes (provide page #)	No (provide
<b>A. General Action Plan Requirements</b>			
<b>Does the Action Plan for disaster recovery identify the proposed use(s) of grantee's allocation, including criteria for eligibility, how the uses address long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas?</b>		<b>Yes</b> (Pages 1, 5, 32-57)	
<b>(1) Needs Assessment</b>	<p>An impact and unmet needs assessment, as described in the Notice:</p> <p>(a) Does the assessment evaluate the three core aspects of recovery – housing, infrastructure, and economic revitalization?</p> <p>(b) Does the assessment of emergency shelters and housing needs address interim and permanent; owner and rental; single family and multifamily; affordable, and market rate; and housing to meet the needs of pre-disaster homeless persons?</p> <p>(c) Does the assessment take into account the various forms of assistance available to, or likely to be available to, affected communities and individuals to identify needs not addressed by other sources?</p> <p>Does the grantee assess whether public services are necessary to complement activities intended to address housing and economic revitalization needs?</p> <p>(d) Did the grantee produce an estimate of unmet need by estimating the portion of need likely to be addressed by insurance proceeds, other federal assistance, or any other funding source by using the most recent available data? Did the grantee cite data sources?</p> <p>(e) Are impacts described by type at the lowest geographical level practicable (e.g., county level or lower if available), using the most recent available data?</p> <p>(h) Does the assessment take into account the costs of incorporating mitigation and resiliency measures to protect against future hazards?</p>	<p align="center"><b>Yes</b> (Pages 1, 5, 32-57)</p> <p align="center"><b>Yes</b> (Pages 11-16, 27-28, 45)</p> <p align="center"><b>Yes</b> (Pages 32-45)</p> <p align="center"><b>Yes</b> (Pages 13-16, 27-28, 45)</p> <p align="center"><b>Yes</b> (Pages 32-45)</p> <p align="center"><b>Yes</b> (Pages 18-26)</p> <p align="center"><b>Yes</b> (Pages 35-37, 62-64)</p>	
<b>(2) Connection between Needs and Allocation(s) of Funds</b>	Does the assessment describe the connection between the identified unmet needs and the allocation of CDBG-DR resources, demonstrating a proportionate allocation of resources relative to areas and categories (housing, economic rev., infra.) of greatest need, including public and HUD-assisted housing?	<b>Yes</b> (Pages 32-45)	
<b>(3) Planning &amp; Coordination</b>	(a) How the grantee will promote sound, sustainable long-term recovery planning informed by a post-disaster evaluation of hazard risk, especially land-use decisions that reflect responsible flood plain management and take into account possible sea level rise (for example, by using FEMA floodplain maps, frequency and intensity of precipitation events, and designs applying the new Advisory Based Flood Elevations (ABFE) or higher)?	<b>Yes</b> (Pages 58-59, 60-65)	
	(b) How the grantee will coordinate with other local and regional planning efforts to ensure consistency?	<b>Yes</b> (Pages 58-59)	
<b>(4) Leveraging Funds</b>	How the grantee will leverage CDBG disaster recovery funds to generate a more effective and comprehensive recovery?	<b>Yes</b> (Pages 59-60)	

(5)	<b>Protection of People and Property; Construction Methods</b>	How the grantee's programs or activities will attempt to protect people and property from harm and how construction methods will emphasize high quality, durability, energy efficiency, a healthy indoor environment, sustainability, and water or mold resistance, including how it will support adoption and enforcement of modern building codes and mitigation of hazard risk, including sea rise, high winds, storm surge, and flooding, where appropriate?	Yes (Pages 60-65)	
		(a) How the grantee will comply with the Green Building Standard established in the Notice for all new construction of residential buildings and for all replacement of substantially damaged residential buildings (i.e., where repair costs exceed 50% of replacement cost)?	Yes (Pages 60-64)	
		(b) How the grantee will comply, to the extent applicable, with guidelines specified in the HUD CPD Green Building Retrofit Checklist for the rehabilitation of non-substantially damaged residential buildings where the repair costs are less than 50% replacement cost, including standards for appliances and products when replaced as part of rehab? This requirement does not apply when Energy star, Water-Sense Labeled, or FEMP-designated products do not exist.	Yes (Pages 60-64)	
		(c) Describe the grantee's standards for housing and small business rehabilitation contractors performing work in the jurisdiction, including a mechanism for homeowners and businesses to appeal the quality of rehabilitation work?	Yes (Pages 60-61)	
		(d) Indicate the grantee's dam/levee work will include registration with the USACE Levee Database or Dam Inventory; ensure the structure is admitted under the USACE P.L. 84-99; ensure the structure is accredited under the FEMA National Flood Insurance Program; will upload the location of the structure and area served and protected into DRGR; and maintain file documentation of a risk assessment prior to flooding the flood control structure and that the investment includes risk reduction measures?	Yes (Page 61)	
(6)	<b>Elevation Standards</b>	Does the grantee indicate that it will apply the elevation standards for new construction, repair or substantial damage, or substantial improvements to residential structures in flood hazard areas, such that the lowest floor is at least 2 feet above the 1 percent annual floodplain elevation?	Yes (Pages 62-63)	
(7)	<b>Public Housing, HUD-assisted Housing, and Housing for the Homeless</b>	How the grantee will identify need (and sources to fund that need) and address the rehabilitation (as defined at 24 CFR.570.202), reconstruction and replacement of: (a) disaster-impacted public housing (including administrative offices), including how the grantee will address the rehabilitation, mitigation and new construction needs of each impacted Public Housing Authority within its jurisdiction; (b) HUD-assisted housing (as defined by the Notice); and  (c) McKinney-Vento funded shelters and housing for the homeless (including emergency shelters, transitional and permanent housing for the homeless, and private market units receiving project-based assistance or with tenants that participate in the Section 8 Housing Choice Voucher program)?		
			Yes (Pages 13-16, 27-28, 45)	
			Yes (Pages 13-16, 27-28, 45)	
			Yes (Pages 13-16, 27-28, 45)	
(8)	<b>Broadband Infrastructure</b>	Does the Plan confirm that the grantee will ensure the installation of broadband infrastructure in a substantially rehabilitated building with four or more rental units?	Yes (Page 64)	

(9)	<b>Disaster-resistant Housing</b>	How the grantee will encourage provision of a housing for all income groups that is disaster-resistant, including a description of how it plans to address:	Yes (Pages 66-69)	
		(a) Transitional housing, permanent supportive housing and permanent housing needs of individuals and families (including subpopulations) that are homeless or at risk of being homeless?	Yes (Pages 12-16, 27-28, 45)	
		(b) Prevention of low-income individuals and families with children (especially those with incomes below 30 percent of median) from becoming homeless?	Yes (Pages 8-10, 12-16, 65)	
		(c) The special needs of persons who are not homeless but require supportive housing (e.g., populations identified in 24 CFR 91.315(e) or 91.215(e) as applicable)?	Yes (Pages 13-16, 65)	
		(d) How planning decisions may affect racial, ethnic, and low-income concentrations, and ways to provide the availability of affordable housing in low-poverty, non-minority areas where appropriate and in response to natural hazard-related impacts?	Yes (Pages 6-8, 13-16)	
(10)	<b>Minimize or Address Displacement</b>	How the grantee plans to minimize displacement of persons or entities and to assist any persons or entities displaced?	Yes (Pages 46-55, 65-68, 84)	
(11)	<b>Program Income</b>	How the grantee will manage program income, and the purpose(s) for which it may be used?	Yes (Page 69)	
(12)	<b>Monitoring Standards and Procedures</b>	(a) Monitoring standards and procedures sufficient to (i) ensure program requirements (including nonduplication of benefits) are met, and (ii) provide for continual quality assurance and adequate program oversight?	Yes (Pages 68-72)	
<b>B. State Grantees Only</b>				
Action Plan describe:			N/A	
(13)	<b>Description of MOD or Programs/Activities</b>	The method of distribution of funds to UGLG's and/or descriptions of specific programs or activities the state will carry out directly?	N/A	
(14)	<b>Basis for Allocations</b>	How the needs assessment informed allocation determinations identified in the Plan, including the rationale for State-identified most impacted and distressed areas not identified by HUD?	N/A	
(15)	<b>Program/Activity Details</b>	For each program or activity carried out by the State:		
		(a) The projected uses of the CDBG-DR funds, including the administering entity, budget and geographic area?	N/A	
		(b) The threshold factors or applicant eligibility criteria, grant size limits and proposed start and end dates?	N/A	
		(c) How the projected use will meet CDBG eligibility criteria and a national objective?	N/A	
		(d) How the projected uses relate to a specific impact of the disaster and will result in long-term recovery?	N/A	
		(f) Has the grantee identified any ineligible activities (e.g., use of CDBG-DR for forced mortgage payoff, construction of dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately-owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, or assistance for second homes)? Are all activities and uses authorized under title I of the Housing and Community Development Act of 1974 or allowed by waiver or alternative requirement published in this Notice?	N/A	
(16)	<b>Criteria to Determine Method of Distribution</b>	When funds are allocated to UGLGs through a method of distribution, all criteria used to determine the distribution, including the relative importance of each criterion?	N/A	
		When programs are carried out directly, all criteria used to select applications for funding, including the relative importance of each criterion?	N/A	



<b>C. Local Government Grantees Only</b>			
<b>Does the Action Plan describe:</b>			
<b>(17) Description of Programs/ Activities</b>	Specific programs and/or activities the UGLG will carry out directly or through subrecipients, and all criteria used to select applications, including the relative importance of each criterion?	<b>Yes</b> (Pages 46-57)	
<b>(18) Basis for Allocations</b>	How the needs assessment informed the allocation determinations?	<b>Yes</b> (Pages 46-57)	
<b>(19) Program/Activity Details</b>	For each program or activity that will be carried out by the UGLG or through a subrecipient: (a) The projected uses of the CDBG-DR funds, including the administering entity, budget and geographic area? (b) The threshold factors or applicant eligibility criteria, grant size limits and proposed start and end dates? (c) How the projected use will meet CDBG eligibility criteria and a national objective? (d) How the projected use relates to a specific impact of the disaster and will result in long-term recovery? (e) Has the grantee identified any ineligible activities (e.g., use of CDBG-DR for forced mortgage payoff, construction of dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately-owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, or assistance for second homes)? Are all activities and uses authorized under title I of the Housing and Community Development Act of 1974 or allowed by waiver or alternative requirement published in this Notice? (f) Has the grantee identified that CDBG-DR funds would be used as a matching contribution for any other Federal program for an eligible CDBG activity? If the match is for U.S. Army Corps of Engineers projects, is the amount of CDBG-DR funds for the project no more than \$250,000? Has the grantee avoided using CDBG-DR funds used to supplant, reimburse, or substitute for FEMA or Army	<b>Yes</b> (Pages 46-57)	
<b>D. Location, Mitigation Measures, Use of Urgent Need</b>			
<b>(20) Presidentially-declared County</b>	Are, or will, all activities be located in a Presidentially-declared county that is eligible for assistance under this Notice?	<b>Yes</b> (Page 73)	
<b>(21) Mitigation Measures</b>	Are mitigation measures a necessary expense related to the disaster relief, long-term recovery, and restoration of infrastructure, housing, or economic revitalization?	<b>Yes</b> (Page 73)	
<b>(22) Use of Urgent Need</b>	If using the Urgent Need national objective, does the grantee reference the type, scale, and location of the disaster-related impacts that each program and/or activity is addressing? Are the impacts in the needs assessment?	<b>Yes</b> (Page 73)	
<b>E. Clarity of Plan and Citizen Participation</b>			
<b>(23) Clarity</b>	Does the action plan include sufficient information so that citizens, UGLGs and other eligible subgrantees or subrecipients, or applicants will be able to understand and comment on the action plan, as well as prepare responsive applications (if applicable)?	<b>Yes</b>	
<b>(24) Budget</b>	Does the Plan include a chart or table that illustrates, at the most practical level, how all funds are budgeted?	<b>Yes</b> (Pages 1, 5)	
<b>(25) Time for Citizen Comment</b>	Did the grantee provide at least fourteen days for citizen comment and ongoing citizen access to information about the use of grant funds?	<b>Yes</b> (Pages 74-76, 82)	

(26)	<b>Publication</b>	Was the proposed Plan published before its adoption? Note: Correct answer is "yes".	Yes (Pages 74-76, 82)	
(27)	<b>Publication</b>	Did the manner of publication including prominent posting on the grantee's official website (with topic of disaster recovery navigable from the homepage of the grantee or relevant agency) and afford citizens, affected local governments and other interested parties a reasonable opportunity to examine the Plan and provide comments?	Yes (Pages 74-76, 82)	
(28)	<b>Website</b>	Does the grantee have a website to access action plans, action plan amendments, QPRs, citizen participation requirements, procurement policies and procedures; executed CDBG-DR contracts, and status of contracts?	Yes (Page 80)	
(29)	<b>Consultation</b>	Did the grantee consult with local governments, public housing authorities? Did the grantee consult with nongovernmental organizations, the private sector and other stakeholders and affected parties in the surrounding geographic area to ensure consistency of the plan with application regional redevelopment plans?	Yes (Pages 4-5, 32)	
<b>E. Clarity of Plan and Citizen Participation (cont.)</b>				
(30)	<b>Accessibility</b>	Was the Plan available in a form accessible to all, including persons with disabilities and non-English-speaking persons? (State which disabilities and which languages.)	Yes (Pages 82, 89)	
(31)	<b>Receipt of Comments</b>	Did the grantee provide a reasonable timeframe and method (including electronic submission) for receiving comments on the plan?	Yes (Pages 74-76, 89)	
(32)	<b>Substantial Amendment</b>	Does the Action Plan define what constitutes a substantial amendment to the Plan, including change in program benefit or eligibility criteria; the addition or deletion of an activity; or the allocation or reallocation of a monetary threshold specified by the grantee?	Yes (Page 77)	
(33)	<b>Summary of Public Comments</b>	If comments were made, does the Plan include a summary of those comments and the grantee's response?	Yes (Pages 89-99)	
(34)	<b>Consistency of Budget</b>	Do the various activities in the Plan add correctly? Are the combined activities equal to or less than the total CDBG-DR amount available? Are the amounts consistent throughout the plan?	Yes (Pages 1, 5, 46-57)	
(35)	<b>Citizen Complaints</b>	Does the grantee's citizen participation plan advise citizens that they will receipt responses to citizen complaints within 15 days of the receipt of the complaint, if practicable?	Yes (Pages 74-76)	
(36)	<b>Risk Analysis Documentation</b>	Has the grantee submitted the Risk Analysis Documentation as described in the Notice?	Yes (Pages 77-83)	
(36)	<b>CDBG-DR Certifications</b>	Does the Plan include the required CDBG-DR certifications? Are the certifications signed by the Chief Executive Officer? (Please see the certifications tab.)	Yes (Pages 83, 86-88)	
(38)	<b>SF-424</b>	Does the Plan include a completed and executed Federal form SF-424? Is the SF-424 signed by the correct grantee official?	Yes (Pages 108-110)	
<b>G. Conclusion</b>				
(39)	<b>Complete and Compliant</b>	Based on the reviewer's responses to the above questions, is the Action Plan complete and in compliance with the Federal Register notice and Public Law 114-113?	Yes (Page 84)	
(40)	<b>Pre-Award, Pre-Agreement, and Reimbursement</b>	The Department expects Grantees to identify pre-agreement costs in their Action Plans. Did the grantee consult with the State Historic Preservation Officers, Fish and Wildlife Service (FWS) and National Marine Fisheries Services (NMFS) when designing a reimbursement program?	Yes (Page 84)	
(41)	<b>Uniform Relocation Act</b>	Grantees must also define "demonstrable hardship" and "not suitable for rehabilitation" in the Action Plan or in policies and procedures.	Yes (Page 85)	

<b>(42)</b>	<b>Deadlines</b>	Does Action Plan include a projection of expenditures and outcomes that shows the grantee will expend funds within the six year timeframe, as required by the Notice?	<b>Yes (Pages 86, 100-107)</b>	
<b>(43)</b>	<b>Most impacted and distressed</b>	At least 80 percent of the funds provided under the Notice must address unmet needs within the "most impacted and distressed" counties identified in Table 1 of the Notice. Does the Action Plan currently show that not more than 20 percent will be spent in locations other than those identified in Table 2?	<b>Yes (Page 85)</b>	
<b>(44)</b>	<b>Approved</b>	Is the Plan approved?	<b>Yes (Page 85)</b>	
<b>(45)</b>	<b>Reason(s) for Resubmittal</b>	If the Plan needs to be re-submitted, please indicate the reasons.	<b>*See HUD Letter &amp; City Response</b>	

*This checklist is part of the administrative record of the Department's review of a disaster recovery Action Plan Amendment submitted pursuant to Section 420 of the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2016 (P.L. 114-113) and the Federal Register Notice published June 17, 2016 (81 FR 39687). In using the checklist, reviewers are reminded that each of the criterion as stated on the checklist is necessarily an abbreviated and generalized summary of the more detailed requirements outlined in the Federal Register Notice for each criterion. Reviewer answers to each question on the checklist must be informed by applying the requirements of each criterion as outlined in the Federal Register Notice to each element of the Action Plan. Use of the checklist does not substitute comparison of the Action Plan Amendment submission against the requirements of the applicable Notices and making a determination based on the Standard of Review set forth in 24 CFR 91.500, as augmented by the applicable Notices.*

**Certifications Checklist**  
**CDBG-DR Grants under Public Law 114-113**

Each State or UGLG receiving a direct allocation in the Notice must make the following certifications:		Certification included with Action Plan?
a.	The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG	Yes
b.	The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.	Yes
c.	The grantee certifies that the Action Plan for Disaster Recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this Notice. The grantee certifies that activities to be administered with funds under this Notice are consistent with its Action Plan.	Yes
d.	The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for in this Notice.	Yes
e.	The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.	Yes
f.	The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each UGLG receiving assistance from a State grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this	Yes
g.	Each State receiving a direct award under this Notice certifies that it has consulted with affected UGLGs in counties designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal areas of the State in determining the uses of funds, including method of distribution of funding, or activities carried out directly by the State.	N/A
h.	The grantee certifies that it is complying with each of the following criteria: (1) Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2015 pursuant to the Robert T. Stafford Disaster Relief and emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.) related to the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events. (2) With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families. (3) The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent of the grant amount is expended for activities that benefit such persons. (4) The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).	
		Yes
		Yes
		Yes
i.	The grantee certifies that it (and any subrecipient or recipient) will conduct and carry out the grant in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601–3619) and implementing regulations, and that it will affirmatively further fair housing.	Yes

<p><b>j.</b> The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:</p> <p>(1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and</p> <p>(2) A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.</p>	
	Yes
	Yes
<p><b>k.</b> Each State or UGLG receiving a direct award under this Notice certifies that it (and any subrecipient or recipient ) has the capacity to carry out disaster recovery activities in a timely manner; or the State or UGLG will develop a plan to increase capacity where such capacity is lacking to carry out disaster recovery activities in a timely manner; and that the grantee has reviewed the requirements of the notice and the requirements of Public Law 114-113 applicable to funds allocated by this notice, and certifies to the accuracy of Risk Analysis Documentation submitted to demonstrate that this has in place proficient financial controls and procurement processes; adequate procures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds; to maintain a comprehensive disaster recovery website; to ensure timely communication of application status to applicants for disaster recovery assistance , and that its implementation plan accurately describes it current capacity and how it will address any capacity gaps.</p>	Yes
<p><b>l.</b> The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or Tribal government or delineated as a special flood hazard area in FEMA's most recent flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the State, local and Tribal government land use regulations and hazard mitigation plan and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.</p>	Yes
<p><b>m.</b> The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.</p>	Yes
<p><b>n.</b> The grantee certifies that it will comply with applicable laws.</p>	Yes
<p><i>This checklist is part of the administrative record of the Department's review of a disaster recovery Action Plan Amendment submitted pursuant to Section 420 of the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2016 (P.L. 114-113) and the Federal Register Notice published June 17, 2016 (81 FR 39687). In using the checklist, reviewers are reminded that each of the criterion as stated on the checklist is necessarily an abbreviated and generalized summary of the more detailed requirements outlined in the Federal Register Notice for each criterion. Reviewer answers to each question on the checklist must be informed by applying the requirements of each criterion as outlined in the Federal Register Notice to each element of the Action Plan. Use of the checklist does not substitute comparison of the Action Plan Amendment submission against the requirements of the applicable Notices and making a determination based on the Standard of Review set forth in 24 CFR 91.500, as augmented by the applicable Notices.</i></p>	

## 10.5 Exhibit E – Duplication of Benefit Procedures

### City of Columbia Duplication of Benefit Procedures

The Robert T. Stafford Disaster Relief and Emergency assistance Act (Stafford Act) requires that recipients of federal disaster recovery funding make certain that no "person, business concern or other entity" will receive duplicative assistance'. Because disaster assistance to each person/entity varies widely based on their insurance coverage and eligibility for federal funding, grantees cannot comply with the Stafford Act without first completing a duplication of benefits (DOB) analysis specific to each applicant.

A Duplication of Benefit occurs when:

- A beneficiary receives assistance
- The assistance is from multiple sources
- The assistance amount exceeds the need for a particular recovery purpose

In response to the severe storms and subsequent flooding that occurred as a result of Hurricane Joaquin (DR 4241/3373), the City of Columbia received supplemental disaster recovery assistance through HUD's Community Development Block Grant (CDBG) Program. This assistance is intended to supplement, not replace, other public, private and nonprofit sector resources that have already been provided for the same need or loss. For example, if a family's damaged home costs \$100,000 to repair and the homeowner received insurance proceeds in that amount, the homeowner could not also receive federal disaster recovery funds to repair the home. In order to ensure that CDBG-DR funding is spent on eligible activities, the City is responsible to verify that each program provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met by funds that have already been, or will be paid, from another source.

The purpose of this document is to outline the process by which the City of Columbia Development will verify that all applications for assistance from the programs funded by the city (both housing and non-housing), as well as all projects implemented by city grantees, contractors and sub-recipients, will be reviewed for possible duplication of benefits. The procedures described below are also applicable to all grantees and sub-recipients, and must be incorporated in the design and administration of programs/projects undertaken by them.

The first step of the DOB determination (calculation) is to determine the amount of assistance needed and the amount of funds previously received, or to be received, for a disaster recovery activity. This is accomplished by first determining the applicant's, grantee or sub-recipient's post-storm disaster need prior to the receipt or potential receipt of other funds. Next, all other sources of recovery assistance received, or available to be received, must be disclosed during the application process and must be verified. Other sources of funds include, but are not limited to: private insurance, Federal Emergency Management Agency, Small Business Administration (SBA), the National Flood Insurance Program (NFIP), local and state funds, other federal programs, and private and nonprofit organizations.



The next step is to identify assistance that is not available for the activity. This consists of: funds received that are not for the same purpose as the CDBG-DR activity(s); funds not available to the applicant, i.e. forced mortgage payoff, funds from private loans not guaranteed by the SBA (forgivable loans are duplicative); and any other asset or line of credit available to the applicant, such as checking and savings accounts, stocks, etc. These funds are not considered to be duplicative and may be excluded from being deducted as a duplication of benefit. Finally, after subtracting from the proposed activity cost the duplicate funds received or available to receive, calculate the maximum CDBG-DR award.

Once the maximum CDBG-DR award has been determined, applicants, grantees or sub-recipients will be required to sign an agreement (either subrogation or Cooperative Endeavor Agreement) requiring them to return to the City of Columbia any assistance received for the same purpose as the CDBG-DR funds. This agreement will be monitored by City of Columbia program staff, grantees and sub-recipients (if applicable) at least once annually for a period of three years. Unless an additional need is established, disaster recovery funds must be recaptured to the extent they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose.

The following is an example of the above described process for DOB determinations:

1: Identify the Applicant's Total Need Prior to Assistance	\$100,000
2: Identify ALL Potential Duplicative Assistance	\$35,000
3: Deduct Assistance Determined to be Duplicative	\$30,000
4: Determine the Maximum Eligible Award (Item 1 less Item 3)	\$70,000
5. Apply Program Cap (if applicable)	\$50,000
6. Calculate Final Award (lesser of Items 4 or 5)	\$50,000

### **Unmet Needs**

Disaster recovery assistance needs are calculated at a point in time. As a result, subsequent circumstances may occur that affect the need. If, after the assistance has been calculated and/or a CDBG-DR award has been made, an applicant can demonstrate a change in circumstances the award calculation may be subsequently reevaluated to take the increased need into consideration. Such changes in circumstance include: vandalism, contractor fraud, an increase in the cost of materials and/labor, a change in local zoning law or building codes, or subsequent damage to a home or business that was partially repaired. However, the reevaluation must be completed before the initial need for which assistance was granted has been fully met (e.g., before a damaged house is fully repaired).

The federal regulation pertaining to the City of Columbia policy and procedure for identifying Duplication of Benefits is found in Federal Register/ Vol. 76, No. 221, November 16, 2011, which should be reviewed as part of determining Duplication of Benefits. This guidance will be incorporated into all the policies and procedures for each CDBG-DR funded program, if applicable.

## **DOB Monitoring**

The process for identifying and then monitoring for DOB begins with the review of each grant application, whether it is for a specific project or an individual beneficiary of CDBG-DR funds. An applicant must provide detailed information about other sources of funds that were received or may be received related to the activity for which CDBG-DR funds are being requested. As part of the application or intake process, the City of Columbia staff will review and verify the other funds to determine if they are for the same activity and exceed the need for recovery assistance. Once CDBG funds are awarded, minus any funding determined to be a DOB, applicants are required to notify the City of Columbia of the receipt of any additional funds received for the same activity. As such, program staff will review individual pay requests and project amendments to determine if other funds have been received that represent a DOB. In the event that additional funds are determined to be a DOB, funds will be withheld from future pay requests, and the approved project budget will be amended. In the event that all funds have been expended and a DOB is identified, the applicant will be required to repay the funds to the City of Columbia for return to the U.S. Treasury in accordance with the signed Grant Agreement, Cooperative Endeavor Agreement and/or Subrogation Agreement.

Monitoring for duplication of benefits will also be incorporated into the city's existing monitoring policies and procedures.

## **Methods for Verifying DOB**

In order to accurately document the amount of other assistance provided to the applicant, the City of Columbia will enter into data sharing agreements with FEMA, SBA, insurance providers and other sources as determined necessary. These agreements will include language regarding PII, the timelines and formats for providing the data, and updates at agreed upon intervals. In the event that a data sharing agreement cannot be reached or regular updates do not occur, the city will require applicant submittal of this information during the application intake process and/or use third party verification procedures so that applicant files are properly documented.

## **Staff Responsible for Conducting DOB Analysis**

The City of Columbia will assign Applicant Intake personnel to perform the initial screening of all documentation submitted by applicants and ensure that all possible duplicative sources of assistance are discussed and disclosed by the applicant. In addition, program applications will include language related to DOB and will require acknowledgement by the applicant. Once the application for assistance is complete, the file will be transferred to a Case Manager for verification from all third-party sources of funding. Once verification of all sources is complete, the Case Manager will perform the DOB analysis as outlined in program policies and procedures. Prior to providing CDBG-DR assistance, a QA/QC review will be conducted in order to ensure that all applications are complete and DOB calculations are correct using the best available data. In addition, the applicant will be required to sign a grant and subrogation agreement prior to the disbursement of funds or commencement of project activities. City assigned Compliance and Monitoring staff will then review regular updates of third party information for duplicative assistance and will alert Case Managers if action needs to be taken on an applicant file. Any duplicative assistance identified will require an

adjustment of the calculation and either a reduction in award or grant recapture carried out in accordance with the program's subrogation agreement, if necessary.

In the event that grant funds are disbursed to a grantee or sub-recipient, the city assigned Program Manager will be responsible to conduct the DOB analysis and ensure that the Grant Agreement or Cooperative Endeavor Agreement contain the appropriate Subrogation Language. The Program Manager will also be responsible for ensuring that all DOB calculations are calculated correctly and will make adjustments as new DOB information becomes available. The Program Manager will also be responsible to ensure that any reduction of award or recapture occurs in accordance with the Grant or Cooperative Endeavor Agreement.