



We Are Columbia

City of Columbia, South Carolina

Community Development Block Grant – Disaster Recovery

Action Plan Amendment Number 2

For the Allocation of New Funding and Current Program Modifications

Public Comment Period: September 14, 2017 – September 30, 2017

Public Comment Period: October 18, 2017 – November 1, 2017

For CDBG-DR Funds

**Disaster Relief Appropriations Act of 2016
(Public Law 115-31, Effective: August 14, 2017)
(Public Law 114-113 Effective June 22, 2016)**

**CITY OF COLUMBIA CDBG DISASTER RECOVERY
ACTION PLAN AMENDMENT NUMBER 2
NON-SUBSTANTIAL
APRIL 17, 2018**

SUMMARY OF REVISIONS

PAGE NUMBER	SECTION	REVISION
Cover Page	CDBG-DR Funds	Revised Public Law 114-3 to Public Law 114-113
Table of Contents	Table of Contents	Corrected missing Sections and page numbers
Page 9	Reallocation of Disaster Recovery Funds	Updated line items for Planning and Subtotal in Total Allocation Column
Page 65	6.0 CDBG-DR Programs: CHAP	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 68	6.0 CDBG-DR Programs: Small Rental Repair Program	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 68	6.0 CDBG-DR Programs: Elevation Reimbursement Program: Eligible Activity	Revised 24 CFR 507.201 to 24 CFR 570.201
Page 70	6.0 CDBG-DR Programs: Elevation Reimbursement Program	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 72	6.0 CDBG-DR Programs: Minor Repair Program	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 74	6.0 CDBG-DR Programs: Small Business Disaster Recovery Program	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 76	6.0 CDBG-DR Programs: Multi-Family Housing Fund	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 79	6.0 CDBG-DR Programs: Columbia Canal Head Gates	Revised start and end date to align with those in Financial Projections updated 12/1/17
Page 81	6.0 CDBG-DR Programs: HMGP Local Share Match	Revised start and end date to align with those in Financial Projections updated 12/1/17

**CITY OF COLUMBIA CDBG DISASTER RECOVERY
ACTION PLAN AMENDMENT NUMBER 1
SUMMARY OF REVISIONS**

PAGE NUMBER	SECTION	REVISION
Page 1	Table of Contents	New page numbers resulting from revisions.
Page 8	Overview: Housing – Buyout	Description of program changes resulting from HMGP approval, transfer of CBP properties, and allocation of \$2 million to HMGP Match Program.
Page 9	Overview: New Programs – HMGP Match	Updated number of properties and total allocation
Page 9	Overview: Reallocation of Disaster Recovery Funds Table	Reallocates CBP funding: \$1 million to HMGP Match, \$1,471,000 to Multifamily Affordable Housing Program
Page 10	Overview: Summary of Substantial Changes – Columbia Buyout Program	Updated to reflect transfer of CDBG DR properties to HMGP
Page 11	Overview: Summary of Substantial Changes - HMGP	Updated number of properties to include those currently in the CBP
Page 12	Overview: Summary of Substantial Changes -Section 10: Appendix	Added projections for new programs
Page 13	Executive Summary	1) Highlighted first paragraph to denote paragraph added 2) Revised percentage and amount of funding for housing to reflect new allocations
Page 18	Regulatory Guidance	Revised demographic percentages to match those on Page 14
Page 50	Housing Unmet Need	Revised percentage to reflect current housing funding allocation
Page 54	Housing Unmet Need – Renter Calculation	Added sentence noting that insurance funds were used to repair the apartment buildings
Page 61-62	Infrastructure	Updated amount of infrastructure repairs, State cost share and date of confirmation
Page 66-68	CDBG DR Programs: Columbia Buyout Program	Revised project description to reflect the transfer of CBP properties and funding to HMGP Match. This program will be closed.
Page 76-77	CDBG DR Programs: Small Business Disaster Recovery	Revised to clarify that those in the most heavily storm impacted areas will receive priority and that businesses must be located within an eligible census tract in the city limits
Page 78	CDBG DR Programs: Multifamily Affordable Housing Fund	Identified the eight Targeted Redevelopment Areas; revised allocation to reflect transfer of a portion of CBP funds
Page 81	CDBG DR Programs: Columbia Canal Head Gates	Added performance outcomes, which are reflected in Exhibit C Projections
Page 83	CDBG DR Programs: HMGP Match	Revised funding allocation and project description to reflect the transfer of CBP properties to HMGP and incorporate description of transition process and next steps.

Page 86-87	Leveraging Funds: Overview	Revised paragraph three to reflect the award of HMGP funds and the transfer of CBP properties to HMGP
Page 93	Disaster Resistant Housing	Updated percentage of housing funding allocation
Page 94	Small Rental Repair	Provided clarification of why program funding is capped at \$100,000 per structure; estimated repair costs are per unit and do not include the cost of environmental remediation
Page 105-107	Citizen Participation Plan	Reinstated the first two sentences, which were deleted in error; added the January 2018 public notice and comment period concerning HMGP; deleted reference to HUD as part of Grievance process
Page 118	City Approval	Added sentence indicating Action Plan Amendment #1 was presented to City Council and approved October 17, 2017
Page 134	Exhibit B - Public Comment 45	Corrected the amount of the cap to \$100,000 to reflect changes in this amendment
Page 135-142	Exhibit C – Revised Expenditure Projections (October 1, 2017)	Updated financial and performance projections for all projects and included projections for the Multifamily Affordable Housing Fund, the Columbia Canal Head Gates, and the HMGP Match Programs
Page 143	Exhibit C – Financial Projections	Inserted a heading identifying date of original Action Plan projections
	Exhibit F – Procurement Policies and Procedures	Included the CDBG Disaster Recovery Procurement Policy

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	Exhibit E – Duplication of Benefit Procedures	
	Exhibit F – Procurement Policies and Procedures	

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

**CITY OF COLUMBIA COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
DISASTER RECOVERY PROGRAM**

ACTION PLAN AMENDMENT NUMBER 1

November 10, 2017

OVERVIEW

The City of Columbia received HUD approval for its CDBG Disaster Recovery Action Plan on January 24, 2017 (Public Law 114-3). The Action Plan described the allocation of \$19,989,000 to programs designed to address unmet needs resulting from the October 2015 Storm/Flood, primarily focusing on rehabilitation of single family residences that meet low to moderate income criteria. This is the first Action Plan Amendment requested by the City of Columbia and is in accordance with the requirements established by HUD in Federal Register dated August 7, 2017(Public Law 115-31), which allocates an additional \$6,166,000 to the City of Columbia for disaster recovery assistance.

Both English and Spanish versions of Action Plan Amendment Number 1 will be made available via the City of Columbia Disaster Recovery website at <http://dr.columbiasc.gov>. A public meeting describing program modifications and additions was held September 14, 2017 at Earlewood Park, 1113 Parkside Drive, Columbia, from 5:30-6:30 pm. A Public Notice announcing the meeting was advertised in *The State* newspaper on September 3, 2017 and throughout local media outlets. Written comments on the proposed Action Plan Amendment will be accepted via U.S. mail or by hand delivery to the Community Development Department at 1225 Lady Street, Suite 102, Columbia, SC 29201 and on the Disaster Recovery website for 14 days from September 15, 2017 through close of business September 29, 2017. The City published a second Notice on October 18, 2017 inviting the public to participate in another 14 day comment period ending November 1, 2017. All comments will be given the same consideration regardless of the method of submission.

Action Plan Amendment Number 1 describes the status of current programs, and provides justification for the reallocation of initial funding and the creation of new programs to address unmet infrastructure and affordable housing needs. As noted in the original Action Plan, the City of Columbia faces a significant challenge in developing programs that benefit low moderate income (LMI) households because the most severely damaged properties are not located in LMI areas. While our overall goals and objectives remain the same, the City of Columbia is proposing a new funding strategy that will maximize assistance to LMI households, both owner and renter occupied, to meet HUD's requirement that 70% of funding benefits LMI households.

As the City approaches the two year anniversary of the October 2015 Flood, we are better informed about how original unmet needs have changed. Public concerns generally involve three questions:

- 1) Why does Columbia flood repeatedly and what is being done to minimize future damage;
 - 2) Why does the disaster recovery process take so long; and
 - 3) Can I be reimbursed for storm related repairs I've already completed?
- 1) It doesn't take a presidentially declared disaster to inundate urban areas, which tend to be more prone to flooding due to proliferating development and the abundance of impervious surfaces

generating large amounts of storm water runoff. Flash floods can strike at any time or place, channeling heavy rains into gullies and streams that quickly transform city streets into turbulent rivers. The severe thunderstorms that hit Columbia on July 23, 2017 – considered a 50 year storm with a 2 percent chance of happening in a given year - flooded roadways in several areas, capturing vehicles and trapping several drivers inside, overwhelming the sanitary sewer system, and causing power outages for 2762 residents.

Columbia is flooding in places not normally flooded. In May 2017 the Columbia City Council approved a storm water fee increase to fund a \$93 million five year plan to reduce the impact of flooding in certain areas. Projects in the Cottontown and Harlem Heights neighborhoods that will increase the number and size of storm pipes to move water out of the area more quickly have been designed and are ready for construction. Feasibility studies are still underway for the Shandon neighborhood and the Five Points entertainment district, including a retention project in Martin Luther King Park.

These actions are in addition to the floodplain management ordinances, new construction standards, and environmental sustainability and disaster resistant housing measures discussed in Section 6, Planning and Coordination. The City also is collaborating with Richland County and other regional partners to evaluate future land use options created by the acquisition of properties located in the floodplain that will establish best practices for storm water management and mitigate repetitive flooding within the city limits.

- 2) Unfortunately, until a locality becomes the victim of a national disaster, it is difficult to adequately describe the frustrating series of challenges faced in planning and executing a large scale disaster recovery program. Nevertheless, the City of Columbia needs to improve its communication of the disaster recovery process, better manage public expectations, expedite and synchronize processes where possible, and reduce the incidence of confusing or conflicting information that often arises from the program differences among the City, its neighboring counties and the State of South Carolina. This is an ongoing process of encouraging citizen participation and responding to public concerns. The program modifications and budget reallocations proposed in this Action Plan Amendment originate directly from applicant input.
- 3) After extensive public outreach and documentation from 339 applicants, the City of Columbia now believes that many property owners did not wait for federal assistance to repair their residences or rental units. Many private insurance companies denied coverage of flood damage forcing small rental property owners and single family homeowners to secure commercial loans to make needed storm damage repairs. In particular, homeowners with major and severe damage appear to have found the means to rehabilitate on their own or with the assistance of volunteer organizations. While some of these applicants have remaining repairs, many are experiencing a financial hardship as a result. Financial hardship is defined as financial difficulty due to the necessity of withdrawing funds from pension or retirement accounts or the use of high interest, high fee loans to make necessary repairs. As a result, the City's reallocation strategy seeks to address these concerns by adding reimbursement of necessary, reasonable costs incurred within one year of the October 2015 Flood as an eligible use of funds for the Minor Repair and Small Rental Repair Programs.

The status of current Disaster Recovery programs as of October 1, 2017 is identified in the chart below:

PROGRAM	NUMBER OF APPLICANTS EXPECTED	NUMBER OF APPLICANTS	NUMBER OF ELIGIBLE APPLICANTS
CHAP	76	24	14
SMALL RENTAL REPAIR	193	44	22
ELEVATION REIMBURSEMENT	22	9	6
BUYOUT	42	17	17
MINOR REPAIR	1198	214	159
	1531	308	218

As noted above, the participation levels are significantly lower than expected, approximately 300 households compared to the earlier estimate of 1531. Based on self-reported data, applicants found ineligible were either over the 80% AMI (40.5%), did not register with FEMA (25%), or they already had completed storm damage repairs. A few applicants have withdrawn voluntarily.

Between May 31 and August 2, 2017, the City hosted ten (10) public outreach sessions attended by 193 residents; press releases were sent to approximately 70 local media organizations and interviews were conducted by several television and radio stations; a notice of the initial public information meeting was posted on YouTube and received 149 views; program information was posted on the City Talk, WISTV, and ABC Columbia websites; and in September the City mailed 1800 letters to rental property owners registered with the Department of Code Enforcement to solicit interest in the Small Rental Repair Program. The following broadly describes lessons learned in each program activity:

Housing - major rehabilitation of single family (one to four units) primary residences:

- ❖ Based on self-reported data, 55% applicants deemed ineligible for the Columbia Homeowner Assistance Program (CHAP) did not meet 80% AMI income levels. These homeowners appear to have found the means to rehabilitate on their own or with the assistance of volunteer organizations.
- ❖ Applicants who registered with FEMA were allowed to register only one property giving rental property owners the option of filing a damage assessment on their residence or the rental unit. All chose to register residences. For this reason we renewed our outreach to landlords, mailing 1800 letters to solicit interest in the Small Rental Repair Program (SRRP). We are experiencing a significant increase in calls from potential applicants.
- ❖ Approximately 90% of the programs approved in the original Action Plan were geared to owner occupied, single family households. The need for affordable rental housing is well documented in the needs assessment of our Action Plan and the Columbia Consolidated Plan and our Substantial Amendment reallocation strategy reflects this ongoing unmet need. To increase participation in our Small Rental Repair Program, the City proposes to reduce the funding cap from \$150,000 to \$100,000 per property, add reimbursement up to \$10,000 for necessary and reasonable storm related expenditures as an eligible use of funds, and reduce the number of years for maintaining affordable rates from three (3) years to two (2) years.

Housing - minor rehabilitation of single family housing:

The Minor Repair Program has received the most participation with 230 applicants as of October 1, 2017. Those determined not eligible are either over the 80% AMI income limit, have already completed storm related repairs, or are no longer interested in the program. Our reallocation strategy seeks to address

these concerns by raising the income level to 120% AMI; and adding reimbursement of necessary, reasonable costs incurred by homeowners for storm damage repairs completed prior to application and within one year of the October 2015 Flood.

Housing - buyout of residential properties in the floodplain:

Prior to the CDBG Disaster Recovery Action Plan approval, the City submitted applications (269 and 270) to FEMA for its Hazard Mitigation Grant Program (HMGP) that originally identified 32 property owners interested in the City's purchase, demolition and disposition of their property. Seventeen (17) of those households also applied to the CDBG Disaster Recovery Buyout Program when it became available. On November 9, 2017, the date this substantial amendment was submitted to HUD, the City received a notice of award for the two HMGP applications. In the interest of leveraging all potential funding sources, the City is requesting that \$2 million in CDBG funding currently allocated to the Buyout Program be transferred to the newly proposed FEMA HMGP Match program. Property owners will be notified of the change in program; however, the acquisition process is essentially the same for both programs.

Housing – pre-award/pre-application expenses:

The City allocated 16.6% of its Disaster Recovery funds in the initial Action Plan to the Elevation Reimbursement Program with the knowledge that any severely damaged properties in the floodplain would require elevation to two feet above the Base Flood Elevation to meet city ordinances. Public participation in this program has been minimal, most likely because of the documentation requirements. Only nine (9) homeowners applied for program funds, but three are located in the floodway and are prohibited from receiving Disaster Recovery funds. The City will reimburse \$120,000 of documented elevation costs for the six eligible applicants, close the program, and transfer funds to other activities.

New Programs – infrastructure and Local Cost Share Match:

The City is redirecting remaining funds and allocating new funds to 1) critical local infrastructure, 2) unmet needs for affordable housing, and (3) the HMGP 25% Local Cost Share Match. Specifically, the City expected to receive FEMA Public Assistance funds to repair a critical infrastructure project. The Canal Head Gates project provides potable water to thousands of residents, within and outside the city limits, as well as hospitals, universities, municipal buildings, police and fire stations. Damage to this public facility threatens the public health and safety during every heavy rain event, thus meeting the criteria of Urgent Need. The City also is proposing to fund new construction of affordable multifamily housing targeted to one of the City's designated revitalization areas to further meet the needs of LMI renters and those displaced by the October 2015 Flood. We have allocated \$2 million to the HMGP 25% Local Cost Share Match, allowing the City to purchase approximately 30 properties that have not already sold or been renovated, including those previously eligible for CDBG DR funds, at 100% of the cost.

ACTION PLAN AMENDMENT NUMBER 1 REALLOCATION OF DISASTER RECOVERY FUNDS¹

The following table describes the funding transfers between approved recovery activities contained in the Action Plan and activities proposed in Action Plan Amendment Number 1.

COLUMBIA, SOUTH CAROLINA CDBG DISASTER RECOVERY TOTAL ALLOCATION					
CDBG DISASTER RECOVERY PROGRAM	FIRST ALLOCATION	SECOND ALLOCATION	TOTAL ALLOCATION	PERCENTAGE OF FUNDING	IMPACTED PROPERTIES
Administration*	\$999,450	\$308,300	\$1,307,750	5%	
Planning*	\$999,450	\$2,924,050	\$3,923,500	15%	
Columbia Homeowner Assistance Program	\$3,336,150	(\$356,150)	\$2,980,000	11%	50
Homeowner Buyout Program	\$2,000,000	(\$2,000,000)	\$0	0%	
Small Rental Repair Program	\$6,565,270	(\$3,565,270)	\$3,000,000	11.5%	50
Elevation Reimbursement	\$3,490,000	(\$3,370,000)	\$120,000	0.5%	6
Minor Repair Program	\$2,398,680	\$2,554,070	\$4,952,750	19%	350
Small Business Assistance Program	\$200,000	\$0	\$200,000	1%	10
Subtotal			\$16,484,000		
MF Housing		\$3,671,000	\$3,671,000	14%	150
Canal Head Gates		\$4,000,000	\$4,000,000	15.3%	
25% Local Cost Share Match (HMGP)		\$2,000,000	\$2,000,000	7.7%	30
Total	\$19,989,000	\$6,166,000	\$26,155,000	100%	646

*Increased allocation to Administration to reflect 5% of new total allocation; increased allocation to Planning to reflect 15% of new total allocation

SUMMARY OF SUBSTANTIAL CHANGES

Pursuant to the Grant Amendment Process identified in the Federal Register Notice of August 7, 2017, the City of Columbia has consulted with citizens, stakeholders, local government agencies and the Columbia Housing Authority to recalculate its needs assessment. All comments have been incorporated in preparing this Action Plan Amendment Number 1, which allocates \$6,166,000 in new funding not identified in the approved Action Plan and proposes the following program additions and modifications:

1. *The Columbia Homeowner Assistance Program (CHAP):*

The City updated program status including number and demographics of eligible applicants; changed the acceptable level of damage to include all major damage; eliminated the requirement for FEMA registration; clarified the use of the \$150,000 funding cap to include city building codes, floodplain ordinances, environmental remediation and green building requirements; and reduced funding based on projected participation levels. The program will be closed to applicants upon expenditure of all funding.

¹ The funding reallocation table does not include \$1 million in CDBG Program Income funds dedicated to the Minor Repair Program.

2. Columbia Buyout Program:

The City updated program status to reflect the transfer of all CDBG DR properties to the Hazard Mitigation Grant Program. The program will be closed to applicants.

3. Columbia Small Rental Repair Program

The City updated program status including number of applicants and estimates of landlord participation; decreased the funding cap to \$100,000 per property; added reimbursement up to \$10,000 of necessary, reasonable costs incurred by homeowners for storm damage repairs completed prior to application and within one year of the October 2015 Flood; reduced the number of years for maintaining affordable rates to 2 years to increase participation; and transferred funds to other activities.

4. Columbia Elevation Reimbursement Program

The City revised the program based on current participation, provided a rationale for closing the program to applicants, and transferred funds to other programs.

5. Columbia Minor Repair Program

The City updated program status describing current participation and description of unmet needs; added Urgent Need as a National Objective and revised eligibility criteria to include up to 120% AMI; added reimbursement of necessary, reasonable costs incurred by homeowners for storm damage repairs completed prior to application and within one year of the October 2015 Flood; eliminated the FEMA registration requirement; and increased funding based on participation projections.

6. Small Business Disaster Recovery Program

The city updated program status and participation levels and changed the national objective to Low-to-Moderate Income (LMI) Area; reduced the term of the loan to 2 years with 50% forgiven each year; and eliminated the need for gap financing. Businesses must be located along a commercial corridor damaged by the Flood of 2015 and demonstrate a contribution to economic revitalization of the area. No changes in funding are proposed.

7. Multifamily Affordable Housing Fund: The City is allocating funds for new construction of affordable rental housing for low to moderate income households up to 120% AMI to accommodate the need for workforce housing. The City will promote partnerships among federal agencies, state and local governments, and both non-profit and for-profit developers. This program will meet both LMI Housing and Urgent Need national objectives.

8. Canal Head Gates Repair and Improvements: The City will replace two critical Head Gates of the Columbia Canal facility, a multi-functional water supply utility that supplies potable water to 134,309 residents, all Columbia critical facilities, and the hydro plant located at its southern end, thus serving as a source of green hydroelectric power to the nation's energy grid. This will be a Public Facility Improvement activity meeting the Urgent Need national objective.

9. Local Cost Share Match – HMGP: On November 9, 2017, the date Action Plan Amendment #1 was submitted to HUD, the City received a notice of award for HMGP applications 269 and 270. In the interest of leveraging all potential funding sources, the City is requesting that \$2 million in CDBG funding previously allocated to the Columbia Buyout Program (CBP) be transferred to the FEMA HMGP Match program. If approved, the CBP will be closed and existing applicants will be transferred to HMGP Match. The HMGP Match Program will assist approximately 30 property owners still interested in

selling homes damaged by the October 2015 flood in meeting the 25% local cost share match requirement.

Summary of Administrative and Non-Substantial Changes

Section 1: Executive Summary (pages 12-13)

The City revised the Executive Summary to reflect current program status, the justification for reallocation of funds, and the creation of infrastructure and multifamily housing projects.

Section 2: Disaster Impact Overview and Regulatory Guidance (pages 14-18)

The City updated this section to reflect the addition of \$6,166,000 under Public Law 115-31; and describes its funding allocation strategy.

Section 5: Unmet Needs Assessment (pages 46-82)

The unmet needs assessment for housing and infrastructure has been updated using available data as of Sept/October 2017.

Section 6: Planning and Coordination (pages 83-99)

The City updated this section to describe the status of FEMA HMGP and Public Assistance funding; provided status on economic development needs; noted the responsibilities of the construction manager; the request for CDBG Disaster Recovery funds for repair of a critical infrastructure project; and expanded the discussion of disaster resistance housing.

Section 7: Location, Mitigation Measures, Use of Urgent Need (page 101)

The City reported the execution of the FEMA Programmatic Agreement and Addendum to streamline the environmental clearance process for historic preservation.

Section 8: Clarity of Plan and Citizen Participation (pages 102-113)

The City described citizen participation and public outreach to introduce the Action Plan Amendment; and provided enhanced grievance procedures, the status of environmental reviews and Authorization to Use Grant Funds, and described changes to its case management approach and procedures to ensure timely notification of applicant status; revised the description on Information Technology to include the development of a tracking and reporting database; updated the section on case management and the summary of public comments pertinent to this Action Plan Amendment.

Section 9: Conclusion (page 114-115)

The City updated pre-award costs to reflect current expenditures and provided status of environmental services contract award; added approval of Action Plan Amendment Number 1 by the City Council on October 17, 2017.

Section 10, Appendix (page 116-156)

Exhibit B-Public Comment, has been revised to incorporate the most recent public comments and a description of outreach efforts; Exhibit C-CDBG DR Expenditure Projections has been revised to reflect updated expenditure, financial and performance projections resulting from program changes proposed in this Action Plan Amendment; included projections for the Multifamily Affordable Housing Fund, the Columbia Canal Head Gates Project, and the HMGP Match Programs in Exhibit C-CDBG DR Expenditure, Financial and Performance Projections; Exhibit E, Duplication of Benefits has also been updated; Exhibit F, Procurement Policies and Procedures has been updated.

1.0 Executive Summary

Action Plan Amendment Number 1 describes the status of current programs, and provides justification for the reallocation of initial funding and the creation of new programs to address unmet infrastructure and affordable housing needs. As noted in the original Action Plan, the City of Columbia faces a significant challenge in developing programs that benefit low moderate income (LMI) households because the most severely damaged properties are not located in LMI areas. As the City approaches the two year anniversary of the October 2015 Flood, we are better informed about how original unmet needs have changed. While our overall goals and objectives remain the same, the City of Columbia is proposing a new funding strategy that will maximize assistance to LMI households, both owner and renter occupied, to meet HUD's requirement that 70% of funding benefits LMI households.

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 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.

Columbia is proposing a reallocation of its initial appropriation of \$19,989,000 to ensure maximum assistance to LMI households sustaining damage from the storm, that attains HUD's 70% LMI benefit requirements, and assists the City in providing safe, disaster-resilient housing critical to the- its long-term recovery strategy. Through this Action Plan Amendment the City is presenting its revised unmet need estimates based on current best available data and will continue to update these estimates as more complete data become available. Housing, including the HMGP Cost Share and the new multifamily rental units comprise 64% (\$16,723,750) of total funding. The following table indicates the revised total budget allocation for \$26,155,000.

Revised Total Budget Allocation for \$26,155,000

COLUMBIA, SOUTH CAROLINA CDBG DISASTER RECOVERY TOTAL ALLOCATION					
CDBG DISASTER RECOVERY PROGRAM	FIRST ALLOCATION	SECOND ALLOCATION	TOTAL ALLOCATION	PERCENTAGE OF FUNDING	IMPACTED PROPERTIES
Administration*	\$999,450	\$308,300	\$1,307,750	5%	
Planning*	\$999,450	\$2,924,050	\$3,923,500	15%	
Columbia Homeowner Assistance Program	\$3,336,150	(\$356,150)	\$2,980,000	11%	50
Homeowner Buyout Program	\$2,000,000	(\$2,000,000)	\$0	0%	0
Small Rental Repair Program	\$6,565,270	(\$3,565,270)	\$3,000,000	11.4%	50
Elevation Reimbursement	\$3,490,000	(\$3,370,000)	\$120,000	0.5%	6
Minor Repair Program	\$2,398,680	\$2,554,070	\$4,952,750	19%	350
Small Business Assistance Program	\$200,000	\$0	\$200,000	1%	10
Subtotal			\$16,484,000		
MF Housing		\$3,671,000	\$3,671,000	14 %	150
Canal Head Gates		\$4,000,000	\$4,000,000	15.3%	
25% Federal Match (HMGP)		\$2,000,000	\$2,000,000	7.7%	30
Total	\$19,989,000	\$6,166,000	\$26,155,000	100%	646

Demographics indicate that 80% of current applicants (as of October 1, 2017) meet LMI requirements, 143 are elderly, 42 are disabled, and 179 are Female Head of Households with children.

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 disrupting the lives of the citizens of 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

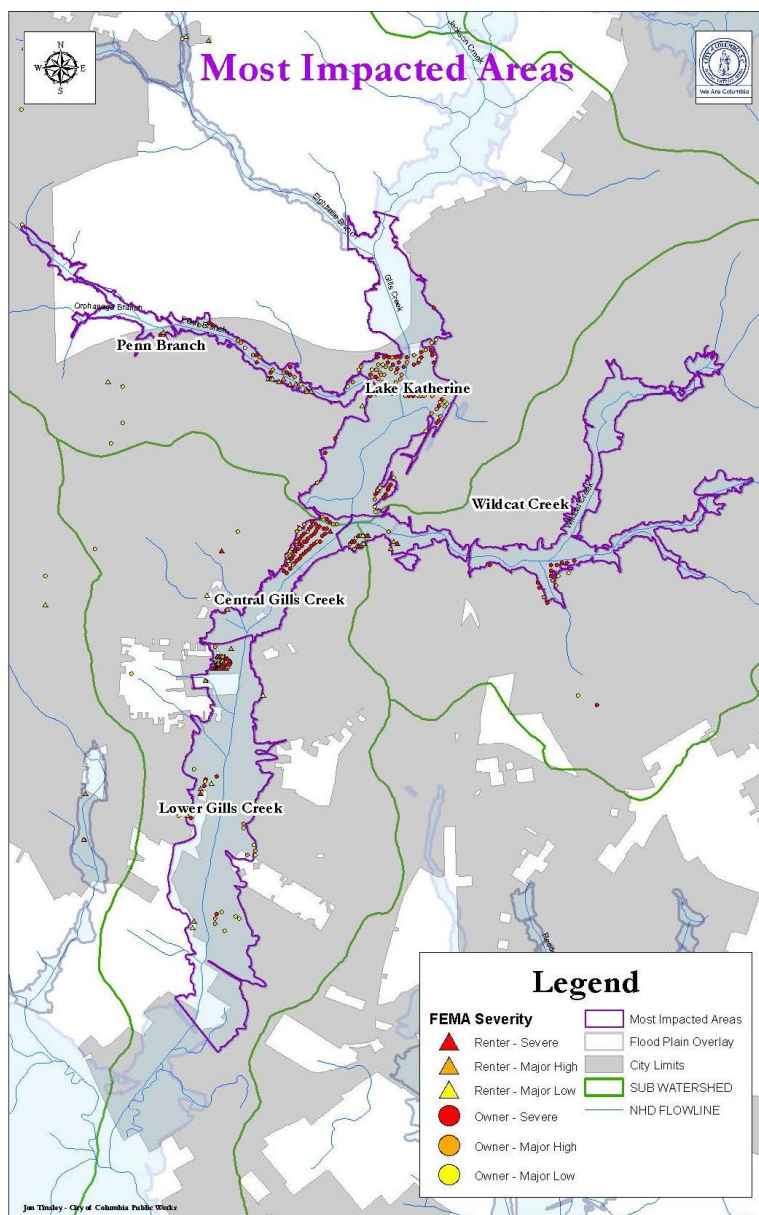
major college football contest from Columbia's University of South Carolina stadium to the opposing team's stadium. As a result, businesses that were not otherwise impacted by the storm's waters experienced tremendous economic loss.

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.



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.

On May 5, 2017 grantees of the 2015 and 2016 CDBG Disaster Recovery Appropriations, received an additional allocation of \$342,200,000 under Public Law 115-31. The City of Columbia was awarded \$6,166,000 to address unmet needs resulting from the Flood of October 2015. Grantees allocated funds under this Federal Register Notice must submit a substantial Action Plan Amendment to HUD within 90 days of the effective date, August 14, 2017.

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 (LMI) 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 updates 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 City’s Disaster Recovery Team has reviewed eligibility and program criteria to identify ways current programs can be modified to meet the needs of more homeowners. We also evaluated new program ideas such as multi-family affordable housing and critical infrastructure improvements. The City has revised its allocation strategy based on comments made at one of our eight public outreach meetings held between May 31, 2017 and August 2, 2017 and information provided by program applicants, local agencies, and disaster recovery stakeholders.

As of October 1, 2017, our Case Managers have processed 320 applicants, 215 have received conditional eligibility based on an evaluation of the damages to the home as documented by FEMA and a preliminary review of the documents establishing ownership, residency, and income. The final award will be contingent upon verification of that information and a home inspection and damage assessment. Applicant demographics include 80% of total applicants qualify as Low to Moderate Income; 46 applicants are undocumented as yet; 143 are over the age of 62; 42 are Disabled; and 179 are Female Head of Households.

Lessons learned indicate that those who could afford it have already completed repairs to their homes, many vulnerable homeowners taking loans or dipping into savings to pay. 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 is allocated to meet the Low-to-Moderate Income Benefit requirements
- Maximize the number of LMI households benefitting from CDBG-DR programs, both homeowner and renter.

The City's initial 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 funding allocation chart indicates the results of the City's most recent analysis of potential LMI applicants using HUD 2017 income limits and projected amounts of remaining unmet needs.

CDBG DISASTER RECOVERY PROGRAM	PROPOSED BUDGET ALLOCATION	PERCENTAGE OF FUNDING	IMPACTED PROPERTIES
Administration	\$1,307,750	5%	
Planning	\$3,923,500	15%	
Columbia Homeowner Assistance Program	\$2,980,000	11%	50
Homeowner Buyout Program	\$0	0%	NA
Small Rental Repair Program	\$3,000,000	11.5%	50
Elevation Reimbursement Program	\$120,000	0.5%	6
Minor Repair Program	\$4,952,750	19%	350
CDBG Program Income-MRP	\$1,000,000		
Small Business Assistance Program	\$200,000	1%	10
Subtotal	\$19,955,000		
25% Local Cost Share Match (HMGP)	\$2,000,000	7.7%	30
MF Housing	\$3,671,000	14%	150
Canal Head Gates	\$4,000,000	15.3%	NA
Total	\$27,155,000	100%	646

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%
Total	52,539	100%	2,188,258	100%

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%
Total	52,539	100%	2,188,258	100%

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 69th 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
Minor-Low	Less than \$3,000 of FEMA-inspected real property damage
Minor-High	\$3,000 - \$7,999 of FEMA-inspected real property damage
Major-Low	\$8,000 - \$14,999 of FEMA-inspected real property damage and/or 1'-4' of flooding on the first floor
Major-High	\$15,000 - \$28,800 of FEMA-inspected real property damage and/or 4'-6' flooding on the first floor
Severe	Greater than \$28,800 of FEMA-inspected real property damage or determined destroyed and/or 6' or more flooding on the first floor

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%
Total	1,274	\$2,347	\$2,990,627	2,717	\$3,595	\$9,768,666	46.9%	30.6%

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

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%
Total	451	\$2,047	\$923,389	502	\$2,133	\$1,070,521	89.8%	86.3%

*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 because it has a limited amount of affordable housing, making it more difficult for renters to adapt to post-flood 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%
Total	174	228	\$29,195	\$6,984,881	25.6%	24.5%

Source: FEMA IA, July 2016

Table 10: Breakdown of Most Affected Renter-Occupied Households

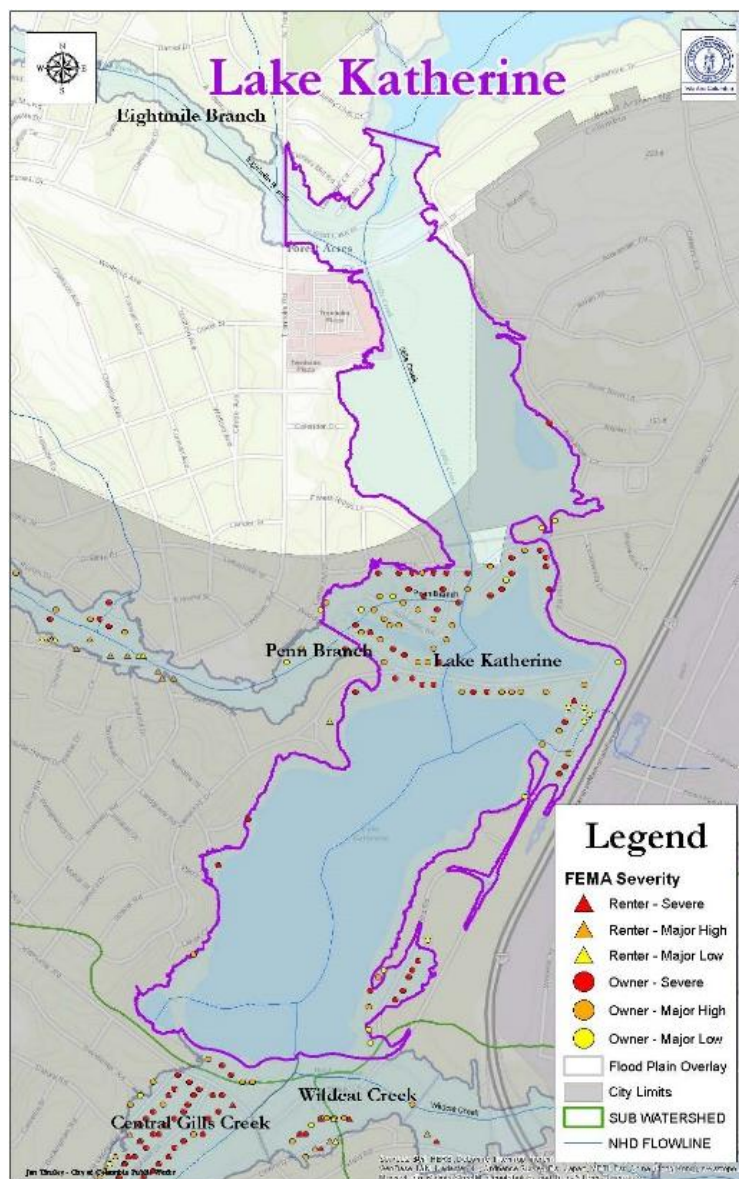
Location	Quantity Damaged	Average PP FVL	Total PP FVL	LMI Households	LMI PP FVL
Lake Katherine	0	\$0	\$0	0.0%	0.0%
Central Gills Creek	13	\$4,716	\$61,313	76.9%	67.5%
Wildcat Creek	10	\$7,739	\$77,393	80.0%	88.8%
Lower Gills Creek	94	\$4,370	\$410,798	83.0%	85.2%
Penn Branch	17	\$3,778	\$64,226	70.6%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

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.

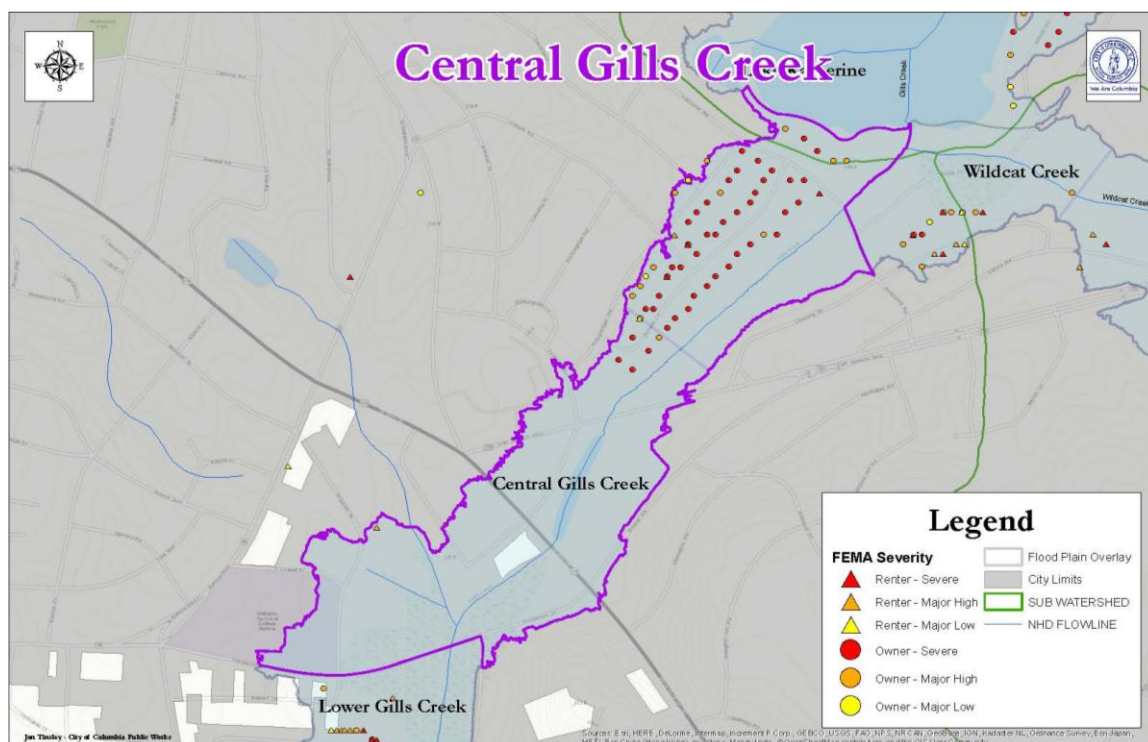
4.1.2 Central Gills Creek

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.

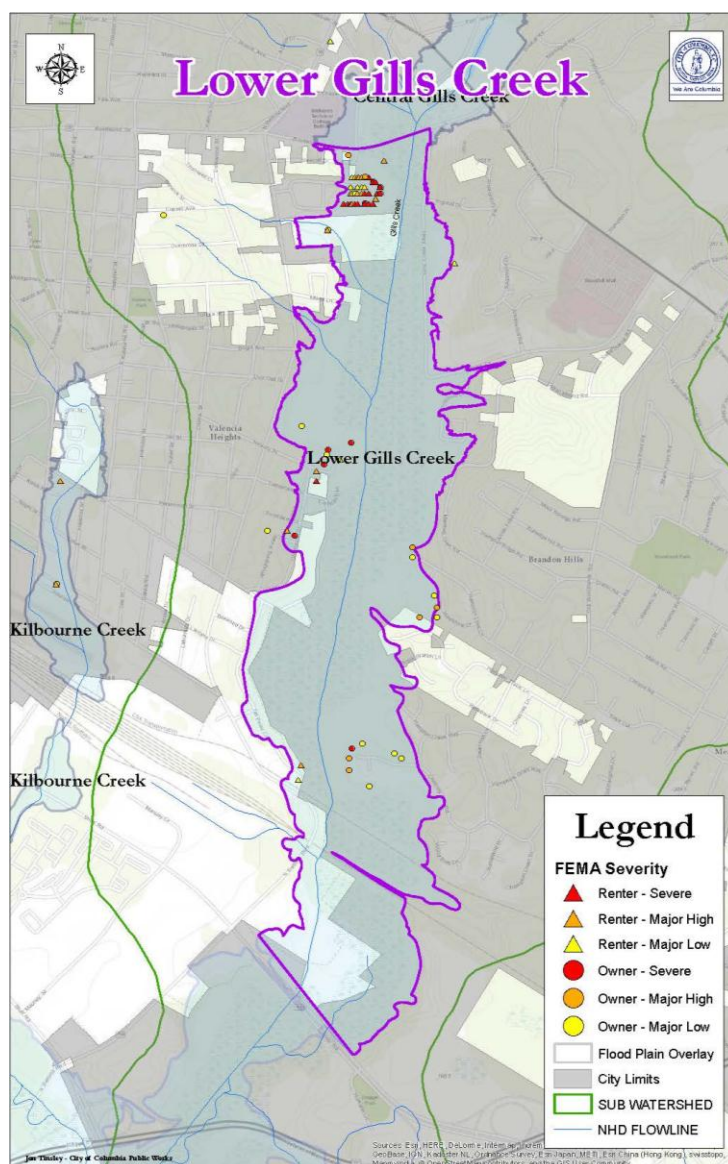
Although Central Gills Creek has a small concentration of rental homes, census tract information indicates that these damaged units may be occupied by vulnerable minority households which may benefit from the proposed Small Rental Repair Program. It is anticipated that most owner-occupied households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

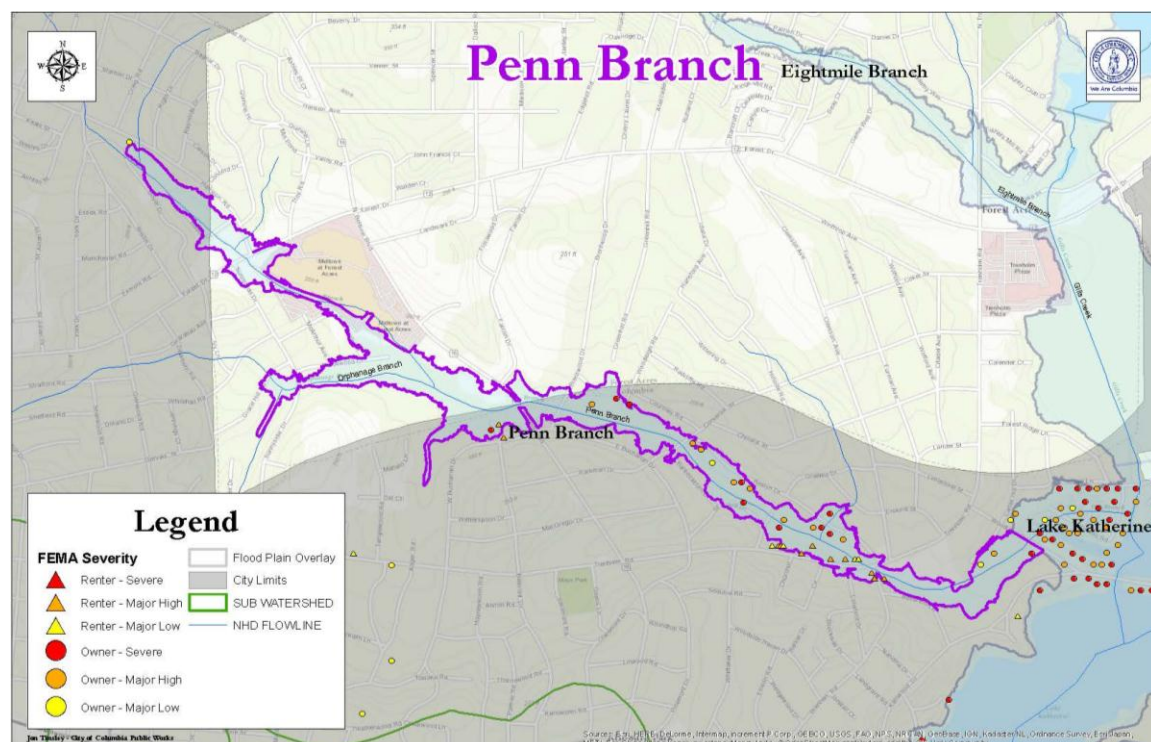
4.1.5 Penn Branch

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 needs 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, more than 200 rebuilding projects have been completed, 58 of those within the City of Columbia. In conjunction with these efforts, the City is committing 26% of its CDBG-DR funding for new construction, repair and reconstruction of affordable rental housing to ensure sufficient resources are available for 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 designed to ensure that restored rental units are only available for re-occupancy by LMI households at or below Fair Market Rates for two [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
Total		\$96,842,021	\$24,210,505

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 5th 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
Total	165	\$12,675,930	\$14,473,343

*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 many impacts remain unaddressed due to the profound extent and diversity of the damages to housing, infrastructure, and the economy; the unique conditions and vulnerabilities of Columbia residents and businesses; and the limitations of 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 updates the City’s preliminary assessment of unmet recovery needs resulting from the October 2015 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 October 1, 2017 and represent the City’s *initial* calculation of remaining recovery gaps. Since October 2015 nonprofit volunteer organizations such as St. Bernard Project (SBP), Restoring Hope and the Midlands Flood Recovery Group have rebuilt 58 homes within the City of Columbia at an estimated value of \$2,314,200, 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.

The primary objective of the Housing and Community Development Act is the “development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income.”

Unmet needs were estimated through a comparison of financial impacts of the disaster 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)
- SC State Housing Finance Authority
- Affordable Housing Coalition
- 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 allows 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 from FEMA and SBA as of *October 1, 2017*. *It is critical to understand that these figures are based on available information at the time this Action Plan Amendment was developed.*

Based upon this information, City of Columbia has identified \$210,388,416 in unmet recovery needs, a 57% increase attributable to estimates of \$170 million in repairs to the Columbia Canal. 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 and the extremely limited number of affordable housing options for low to moderate income residents.

Table 13: Unmet Needs Summary

Recovery Area	Damage/Rebuild Costs	*Assistance Received	*Unmet Need
<i>Housing</i>	\$103,654,345	\$70,081,684	\$33,572,661
<i>Infrastructure</i>	\$189,394,851	\$12,995,324	\$176,399,527
<i>Economic Development</i>	\$18,773,828	\$18,357,600	\$416,228
Total	\$311,823,024	\$101,434,608	\$210,388,416

**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. Based on data obtained from FEMA, SBA, DOA and SCEMD, the City of Columbia is anticipating funding of \$101,434,608. 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	\$36,817,300		\$18,357,600	\$55,174,900
DOA		\$1,000,000		\$1,000,000
Total	\$70,081,684	\$12,995,324	\$18,357,600	\$101,434,608

*Data updated as of October 1, 2017

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 \$70,081,684 in assistance received or anticipated, the total estimated unmet need is \$33,572,661, slightly less than estimated in the original Action Plan.

Table 15: Housing Unmet Needs

Recovery Area	Damage / Need	*Assistance Received / Anticipated	*Unmet Need
Housing	\$103,654,845	\$70,081,684	\$33,572,661

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

As noted in the overview of this Action Plan Amendment, homeowners did not wait for federal assistance to make storm damage repairs. In particular, homeowners with major and severe damage appear to have found the means to rehabilitate on their own or with the assistance of volunteer organizations. Based on self-reported data, 55% applicants deemed ineligible for the Columbia Homeowner Assistance Program (CHAP) did not meet 80% AMI income levels.

Applicants who registered with FEMA were allowed to register only one property giving rental property owners the option of filing damage assessment on their residence or the rental unit. All chose to register residences. For this reason we renewed our outreach to landlords, mailing 1800 letters to solicit interest in the Small Rental Repair Program (SRRP). We are experiencing a significant increase in calls from potential applicants.

Most, but not all, small rental property owners had private insurance or secured commercial loans to make needed repairs. While some of these applicants have remaining repairs, many suffered a loss of rental income for several months and some are experiencing a financial hardship as a result. A demonstrable financial hardship must have occurred after the October 2015 flood and be of a severe,

involuntary, and unexpected nature such as the necessity of withdrawing funds from pension or retirement accounts or the use of high interest, high fee loans to make storm-related repairs.

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
Total	388	\$9,258	\$45,455	4.91

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 64% of CDBG-Disaster Recovery resources to address the unmet housing need. The City's allocation strategy prioritizes 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
Total	2,717	\$9,768,666	4.91	\$47,964,150

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
Total	2,717	\$9,768,666	4.91	\$47,964,150	\$5,208,489	\$13,440,000	\$66,612,639

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:

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

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
Total	502	\$1,070,521	\$766,925	\$216,000	\$87,596

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 because area housing agencies do not track the number of affordable rental units available at a given time. It is helpful, however, to consider Columbia's Section 8 Housing Choice Voucher Program in substantiating the increased need for affordable housing. During a 27-hour period this July, the Columbia Housing Authority (CHA) received 15,241 applications to be placed on the waiting list for its rental-assistance program. Of those applications, only 3,000 were chosen through a lottery system to be placed on the waiting list for one of the authority's 4,000 rental assistance vouchers when they become available.

The payment amount for Section 8 Vouchers, which assist low income residents in securing affordable housing, is based on 98% - 110% of Fair Market Rents (FMR) for the area, which are on the rise in Columbia. In 2017, the CHA increased its payment standard to 110% FMR because participants were unable to locate housing at 100% FMR. Section 8 vouchers expire after 120 days and recipients who cannot find accommodations within that time must reapply.

It is believed two circumstances contributed to this situation. First, adding approximately 4,000 student housing units downtown has affected the cost of monthly rental housing across the city. In 2014 and 2015, the City began offering 10-year, 50 percent tax breaks to private developers building student complexes. Just two years ago, about 1,250 people lived downtown. Now it's close to 7,000 people, mostly University of South Carolina (USC) students. Second, the 2015 Flood damaged more than 2000 homes, requiring many affluent homeowners to move to rental units while their properties were repaired, thus further decreasing the number of units available and allowing landlords to charge higher rates. College students are willing to pay more to live close to campus despite cheaper housing a few miles away. Privately-owned apartment communities that

might otherwise have accepted Section 8 Vouchers, now cater to USC students and their parents.

After speaking with the CHA, the SC State Housing Finance Authority, and the Affordable Housing Coalition, the Columbia Disaster Recovery team canvassed a few multifamily apartment complexes known to be damaged by the storm to help determine the number of units lost and the number and location of residents displaced. Several apartment complexes on Beltline Blvd. and along Blossom Street, where flood waters reached 3-4 feet, sustained major damage. At Hampton Park, an affordable housing complex with 80 units, 48 units were damaged; two buildings or 24 units have not yet been repaired. The Shandon Crossing complex lost 36 units and the rental office. Another 72 second floor units were temporarily evacuated. All units have been repaired and 15 tenants who wanted to return to the property have been rehoused. The City is working with the property management staff to gather contact information for tenants who chose not return to the building. Property owners were forced to use private funds to make repairs because their insurance providers refused coverage.

Many applicants to the Small Rental Repair Program had private insurance or secured commercial loans to make needed repairs after the storm. While some of these applicants have remaining repairs, many suffered a loss of rental income for several months and some are experiencing a financial hardship as a result.

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.

According to Laura Nicholson, Development Director, South Carolina State Housing Finance Authority, there are 84 low income apartment complexes containing 7,847 affordable rentals in Columbia. Approximately 5,067 apartments set rent based on income. There are also 2,466 Project-Based Section 8 subsidized apartments in Columbia.

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 2017 Income Category	Number of Persons							
	1	2	3	4	5	6	7	8
Extremely Low	\$14,100	\$16,240	\$20,420	\$24,600	\$28,780	\$32,960	\$37,140	\$41,320
Very Low	\$23,450	\$26,800	\$30,150	\$33,500	\$36,200	\$38,900	\$41,550	\$44,250
Low	\$37,550	\$42,900	\$48,250	\$53,600	\$57,900	\$62,200	\$66,500	\$70,800

Source: HUD 2017 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%
Total	57	108	63.0%	37.0%

Source: FEMA IA, July 2016 & 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
Total	2,717	\$9,768,666	\$916,196	\$10,684,862

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
Total	502	\$0	\$1,070,521	\$1,070,521

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%
Total	57	228	25.0%	108	134	80.6%	165	361	45.6%

Source: FEMA IA, July 2016 & 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 after the 2015 Flood to participate in FEMA’s Public Assistance (PA) program. The following table illustrates how those damages were documented and categorized. It should be noted that work on the Columbia Canal is now categorized as damage to a Public Utility (Category F), rather than Category D, Water Control Facilities.

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>	\$0	\$0
E	<i>Public Buildings and Contents</i>	\$288,151	\$72,038
F	<i>Public Utilities</i>	\$178,797,049	\$42,500,000
G	<i>Parks, Recreational and Other Items</i>	\$154,110	\$38,528
Total		\$189,394,851	\$47,348,712

Source: City of Columbia, November 2016

The damages shown on Table 26, except for repairs to the Columbia Canal, have not changed significantly in the last year. The City expects FEMA to fully reimburse the \$19,394,851 for non-Canal repairs. The City revised its damage estimates for the Canal after a recent technical assessment indicated more extensive flood related damages. On June 12, Columbia submitted its request for \$170 million for repairs to the Columbia Canal, including \$15 million in mitigation activities and repairs to the Head Gates, spillway, canal dikes, and hydro plant. FEMA plans to obligate \$11.7 million for the entire project, indicating it will not pay for Head Gate repairs, damage to any submerged surfaces, or Federal Energy Regulatory Commission (FERC) codes and standards.

FEMA's Disaster Relief Fund is running low due to recent disasters like Hurricanes Harvey, Irma, and Maria. Given these restraints, the City is considering options for emergency repair of at least two of the canal head gates to improve capacity at the Waste Water Treatment Plant. This Action Plan Amendment proposes the use of approximately \$4 million in CDBG Disaster Recovery funds for design and repair of these two gates.

Based on the categories in Table 26, the city identified its highest level of need in *Category F, Public Utilities*, 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.

Category F also reflects \$8.79 million in repairs to the city's wastewater system to address damages to sewer lift stations and sewer lines and \$1.5 million to repair the city's hydroelectric plant, which is not 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 \$189,394,851. Of this amount, the city is responsible for a 25% cost share of \$47,348,712. 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.

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 has confirmed as of October 2017 that it will pay the non-Federal share of up to 25% of approved, eligible project expenditures.

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 types 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

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: \$2,980,000

Overview and Delivery

The Columbia Homeowner Assistance Program (CHAP), administered by the city's Community Development Department, will provide up to \$150,000 for rehabilitation, repair, or reconstruction of owner-occupied households with *Major* and *Severe* damages directly related to the October 2015 disaster and 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 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 including work that addresses compliance with city building code and floodplain ordinances, environmental remediation, implementing Green Building Standards, the costs of initial homeowner hazard insurance premiums, and coverage of flood insurance premiums (for properties covered by the Flood Disaster Protection Act of 1973 as amended, pursuant to §570.605) for one year.

Connection to Disaster and Updated Needs Assessment

CHAP was developed to address 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 with children will be prioritized for participation in the program, all LMI households will be given the opportunity to receive assistance.

In May 2017, Disaster Recovery staff mailed letters to 259 households on FEMA's major and severe damage lists inviting them to participate in one of two public information sessions and schedule an appointment with a Case Manager. To date Case Managers have processed 25 applicants, 15 are eligible and ready for damage assessment and environmental review.

The CDBG Disaster Recovery team hosted eight additional outreach sessions from July 10 – August 2; total attendance was 135. The City's Public Relations Department (PRD) issued press releases to approximately 70 local media organizations and interviews were conducted by several television and radio stations. Photos taken at one of the initial public information sessions was posted on YouTube. A second press release was issued July 10 announcing the final eight public information sessions. PRD issued a press release and outreach flyer on August 2 announcing the final public information session. Program

information was posted on the Disaster Recovery website, the City Talk July 14; WISTV posted a notice on its website July 18; ABC Columbia posted notices on its website July 10 and July 30; and the Director of Community Development and the Disaster Recovery Manager appeared on WIS TV August 1 to discuss DR program.

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the Columbia's long-term recovery strategy. While single family owner-occupied or rental dwellings suffered the greatest damage from the declared disaster, it is our belief, based on continuing community outreach and information exchange with Richland and Lexington Counties and the United Way of the Midlands, that many of the homeowners identified in the Action Plan have either completed repairs on their own or do not meet the low to moderate income requirements. The program will serve those that have met eligibility requirements and will remain open to applicants until the end of 2017. After some initial damage assessments, we believe some of the applicants to our Minor Repair Program will have more than \$25,000 in damages and will be moved to CHAP. The City is proposing that the initial allocation to this program be reduced to fund other recovery initiatives.

Home repairs and improvements funded through this program will 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:

- 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 sustained *Major* 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 are:

- 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 with less than *Maj* or *Severe* damages.
- Ineligible structure type.

Prioritization of Applicants

One of the City's most important goals is to assist LMI owner-occupied households who experienced the most severe damage. Among those, priority will be given to applicants who are elderly, disabled, and female head of households with children.

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 3) maintain flood insurance in perpetuity if located within a floodplain. Execution of a program covenant memorializing the flood insurance requirement will also be required.

Monitoring

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

Start and End Date

~~June- January 2018 – March 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) (This program will be closed.)

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: \$0

Overview and Delivery

On November 9, 2017, the date Action Plan Amendment #1 was submitted to HUD, the City received a notice of award for the two HMGP applications. In the interest of leveraging all potential funding sources, the City is requesting that \$2 million in CDBG funding currently allocated to the Buyout Program be transferred to the newly proposed FEMA HMGP Match program. If approved, the CDBG Columbia Buyout Program will be closed to applicants. Property owners will be notified of the change in program; however, the acquisition process is essentially the same for both programs and should be a seamless transfer. The program will be closed to applicants.

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: \$3,000,000

Overview and Delivery

The Small Rental Repair Program (SRRP), administered by the City's Community Development Department provides funding for the repair of storm damaged rental properties located outside of the floodplain. The primary goal of SRRP is 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 assist displaced rental households – including those not FEMA registered but who can provide evidence of storm damage - in identifying affordable housing opportunities per the CDBG Disaster Recovery Uniform Relocation Act (URA) Policies and Procedures. Funding for this program will be capped at \$100,000 per structure including work to address compliance with city building codes, environmental remediation, and Green Building standards.

As part of the eligibility requirements for CDBG-DR assistance, rental property owners must agree to rent to Low-to-Moderate Income (LMI) individuals and families at affordable rates and make rehabilitated rental units available first to existing or displaced LMI households. Rental property owners must sign a grant agreement requiring that all rehabilitated units remain affordable for a period of two (2) years. For the purpose of the SRRP, small rental properties are those with one to four rental units, including single family, duplex, triplex, and quadraplex buildings on one tax parcel. The rent for an affordable rental unit will be based on 50-80% of the local Fair Market Rate for its size. Rental complexes with four units designated as a *substantially rehabilitated building* will be provided with broadband infrastructure. Tenants temporarily displaced by rehabilitation activities will be eligible for relocation assistance as described in the Disaster Recovery URA Policies and Procedures.

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 applicant input and remaining housing needs cited in this Action Plan Amendment, the city has determined that single family rental properties suffered extensive damage from the declared disaster.

Initially, the City received only a few applications for this program, perhaps because many property owners used insurance proceeds to complete necessary repairs or because rental owners were not permitted to register those units with FEMA if they registered damages to their residences. Consequently, a new outreach strategy was initiated to contact all property owners with rental units in the City of Columbia using information from the SBA's database of storm damaged commercial properties and a list of landowners registered with the Code Enforcement Department. In early September approximately 1850 letters were mailed to property owners soliciting interest in the program. Currently, we are processing 46 applications from rental property owners that will serve LMI households for two (2) years. Registration with FEMA is no longer required.

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:

- 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 are:

- 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

Tenants displaced from storm damaged rental units will be given first right of return with elderly, disabled, or female head of households with children prioritized for placement in restored units. The City projects 50 households will be assisted.

Use of Funds

Rehabilitation funds will be made available to property owners who agree to: 1) rent rehabilitated properties to tenants whose incomes are at or below 80% AMI, and 2) maintain affordable rent levels for two years and 3) maintain flood insurance in perpetuity, if located in a floodplain. 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 unit, the property owner must provide the city with a copy of the executed lease as well as tenant income and demographic information. This information will be submitted annually as leases are renewed in order to monitor the program's affordability requirements.

The City also recognizes that many rental property owners did not wait for federal assistance to complete necessary repairs, many receiving insurance proceeds, securing loans, or using savings to pay for construction costs. To address this need the City may reimburse applicants who used personal funds to repair damage to their homes resulting from the storm if they can demonstrate a financial hardship and the program determines the costs associated with these repairs are both reasonable and necessary. Reimbursements are limited to costs incurred by homeowners for repairs completed prior to program application and within one year of the 2015 Flood. The minimum amount of reimbursement is \$5,000 with a \$10,000 maximum allowable. Applicants for reimbursement may include households already deemed eligible. Detailed receipts will be necessary.

Monitoring

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

Start and End Date

April 2018 – December 2020 (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 570.201

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

Activity Allocation: \$120,000

Closed to Applications

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 required to rebuild more resilient homes 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 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 with the lowest floor two feet 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, 261 sustained "Severe" and "Major" damages.

The City has received nine applications for elevation reimbursement; six are preliminarily eligible; three are ineligible because the properties are located in the floodway, which are forbidden from receiving federal funds. The current allocation of almost \$3.49 million for elevation reimbursement will be reduced to \$120,000 to cover reimbursements to the six existing eligible homeowners.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located in a floodplain within the 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 sustaining Major or Severe damages.
- Damaged residence must be a single-unit structure.
- 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 within a floodway.
- Homes located outside a floodplain or Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than one unit.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Applicants who are not classified by FEMA with Severe damages or required to elevate by 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.

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, which will be memorialized by execution of a program covenant.

Monitoring

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

Start and End Date

January 2018 – 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, Urgent Need

Activity Allocation: \$5,952,750 \$4,952,750 in CDBG-DR funds, \$1,000,000 CDBG Entitlement Program Income Funds)

Overview and Delivery

The Minor Repair Program (MRP), administered by the city's Community Development Department, assists low-to-moderate income owner-occupied households that sustained *Minor*-damages as a result of the 2015 storm and who have remaining repair needs not covered by the FEMA Individual Assistance Program or Small Business Administration. Funding up to \$25,000 will repair rain/flood damages including work related to environmental remediation, Green Building improvements, and repairs necessary to bring dwellings up to the International Property Maintenance Code, thus ensuring these housing units are more resilient to future natural hazards.

The City has received 220 applications for the Minor Repair Program to date. Of those 186 have met preliminary eligibility criteria and are scheduled for damage assessments and environmental reviews beginning in September 2017. This number is far below the number projected in the original Action Plan. Applicants that are not eligible under current guidelines fall into two categories: over income limits (sometimes by hundreds of dollars) and those that did not register with FEMA. In our desire to assist more homeowners with storm damaged residences, the City proposes to increase the income limits to 120% AMI. All existing applicants meet the 80% or less AMI income requirement, a 90% LMI overall program benefit. For those LMI applicants that are elderly, disabled, or female headed households with children, we will eliminate the requirement for FEMA registration. These changes could allow us to repair another 100 homes, thus boosting our ability to minimize the impact of future storms while still offering financial assistance to households with limited resources.

As a result of outreach efforts and information provided by applicants, the City also recognizes that many homeowners did not wait for federal assistance to complete necessary repairs, many securing loans or using savings to pay for repairs. To address this unmet need the City may reimburse applicants who used personal funds to repair damage to their homes resulting from the storm if the program determines the costs associated with these repairs are both reasonable and necessary. Reimbursements are limited to costs incurred by homeowners for repairs completed prior to program application and within one year of the 2015 Flood. The minimum amount of reimbursement is \$5,000 with a \$10,000 maximum allowable. Applicants for reimbursement may include households already deemed eligible. Detailed receipts will be necessary.

Connection to Disaster and Unmet Needs

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to 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 Amendment, the city determined that single family owner-occupied dwellings suffered the greatest damage from the

2015 Flood. Home repairs and improvements funded through this program will 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.

Eligible Applicants

Eligibility requirements for participants in this program are:

- 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 sustained Minor damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium with less than \$25,000 in damages.
- Applicants must be between 80% - 120% AMI at application intake.

Ineligible Applicants

Ineligibility criteria for this program is:

- 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.
- Ineligible structure type.

Prioritization of Applicants

Applicants who are elderly, disabled, or female headed households with children will be given first priority for participation in MRP. Currently, more than 50% of eligible applicants are elderly, 15% are disabled, and 88% are female headed households with children. Remaining applications for assistance will be processed in the order they are completed and determined eligible. The City expects to assist 350 households through this program

Use of Funds

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 executing repairs; 2) ownership and occupancy of the home for not less than one (1) year after the completion of repairs; and, 3) maintenance of flood insurance in perpetuity on the damaged home, if located within a floodplain. Execution of a program covenant memorializing the flood insurance mandate will also be required for homes in the flood plain.

Monitoring

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

Start and End Date

January 2018-December 2022 (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 Area

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 as working capital to purchase inventory, furnishings and equipment, and for cleanup and repairs. Loans will be forgiven over a period of two years with 50% 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

The forgivable loan shall be considered in default and repaid only if the borrower closes, sells, relocates outside the city limits, or has a significant change in ownership for any reason, to include foreclosure and/or any other legal action, prior to the two-year maturity date. If default occurs, borrower will be issued a notice requesting immediate repayment of the pro-rated amount remaining on the loan.

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 City anticipates assisting ten businesses that serve LMI residents within a half mile service area. The SBDR is expected to provide sustainability to local small businesses and economic revitalization to commercial corridors affected by the 2015 storm and resulting flood.

Eligible Applicants

Eligibility requirements for participants in this program are:

- Businesses must be located in an eligible census tract in a commercial corridor within the city limits.
- 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.
- Applicants must qualify as a Small Business with less than 50 employees.

- Business Owners must have owned and operated the business as of and prior to the date of the storm event (October 2015).
- Businesses must be located in a low-to-moderate income census tract where 20% of residents are at or below the poverty level.
- Priority will be given to businesses located in the most heavily impacted areas.
- Businesses must provide financial statements, tax returns or other documentation to demonstrate continuing unmet need.

Ineligible Applicants

Ineligibility criteria for this program are:

- 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 severely impacted areas.

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 as working capital to purchase inventory, furnishings, and equipment as well as cleanup and repair. Loans will be forgiven over a two year period with 50% 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 Department in accordance with executed loan agreements and the City of Columbia CDBG-DR Monitoring Plan.

Start and End Date: April 2018 – September 2019

Multifamily Affordable Housing Fund

Eligible Activity: Housing, New Construction; Acquisition and demolition

National Objective: Low to Moderate Income Benefit - Housing

Activity Allocation: \$3,671,000

Overview and Delivery

The City of Columbia faces a broad mixture of unmet needs that complicate our ability to meet the 70% low-to-moderate-income (LMI) requirement. Our single family housing rehabilitation programs, Columbia Homeowner Assistance Program and Minor Repair Program, drew relatively small numbers of applicants, as did the Small Rental Repair Program. Multifamily rental housing provides an opportunity to meet the LMI requirement while creating greater flexibility within CDBG-DR programs to meet the other unmet affordable housing needs identified in this CDBG-DR Action Plan Amendment.

The availability of affordable housing in Columbia is becoming a dire situation. 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. To offset the loss of rental units, the City is proposing a reallocation of other program funds to construct affordable multifamily rental units in one of eight neighborhoods targeted for revitalization and redevelopment, thus extending its long-term vision for a healthy, vital community. The Targeted Redevelopment Areas include:

- Belvedere Redevelopment Area
- Booker-Washington Heights Redevelopment Area
- Brandon Acres/Cedar Terrace Redevelopment Area
- Eau Claire Redevelopment Area (Farrow Road Business Corridor)
- Edisto Court Redevelopment Area
- King/Lyon Street Redevelopment Area
- Neighborhood Revitalization Strategy Area Redevelopment Area
- Pinehurst Redevelopment Area

The Multifamily Affordable Housing Fund will allow the City to use grants, loans, loan guarantees, and/or interest rate subsidies to finance the acquisition and demolition of vacant land, new construction of rental housing or homebuyer properties, or reconstruction of damaged units on the same lot. Projects will be selected using the following criteria:

- Project activities are consistent with the priorities established in the City's Consolidated Plan;
- Readiness to proceed;
- The project will replace rental units damaged by the storm;
- The project is located within a City of Columbia Neighborhood Revitalization area
- The project maximizes the number of LMI beneficiaries;
- The project imposes affordability restrictions that match the level of CDBG-DR investment;
- The project is financially viable and all other financing sources have been committed;
- The project timeline is realistic, costs are reasonable, and the developer's level of experience and financial capacity is substantial.

Project financing will take into account the projected operating expenses, the ability to repay project debt, and the likely cash flow from the project. The financial structure and payment options will reflect the realities of the project and partnerships selected. To the greatest extent practical, the City will encourage the leveraging of CDBG DR funds by employing housing bonds, FEMA funds, other state and local financial sources, and Low Income Housing Tax Credits when feasible.

The City will assure that the Uniform Relocation Act requirements are followed, that both displaced occupants and current occupants of the project are identified and records are maintained. These occupants will receive advisory services and relocation assistance if applicable.

Connection to Disaster and Unmet Need

The 2015 Flood indirectly increased an existing shortage of affordable housing, created by displaced homeowners entering the rental market at the same time that a portion of the multifamily market was severely damaged or destroyed. The City is experiencing a severe lack of decent, safe, sanitary housing, accompanied by increased rents at all levels of the housing market. As rents rise, LMI households become increasingly rent burdened or priced out of the market. These impacts are directly attributable to the disaster and will be documented and described as an unmet need in the Action Plan.

As stated in Federal Register dated June 9, 2016, under Public Law 114-113, grantees may also fund new construction (see paragraph 28 of Section VI of this notice) or rehabilitate units **not** damaged by the disaster if the activity clearly addresses a **disaster-related impact and is located in a disaster-affected area**. This impact is demonstrated by the disaster's overall effect on the quality, quantity, and affordability of the housing stock and the resulting inability of that stock to meet post-disaster needs and population demands.

While no statistics are available concerning the direct loss of rental housing due to the October 2015 flood, the disaster recovery team has visited several multifamily apartment complexes damaged by the storm. Anecdotal evidence from property managers suggests that the shortage of affordable housing, including rental units, has escalated since the storm and that many landlords raised rates after repairing property damages.

Eligible Applicants:

- Partners: Units of local government
- Owners: Owners of damaged units
- Developers: Nonprofit or for-profit developers seeking funds for new affordable housing.

Prioritization of Applicants:

Priority will be given to development projects that replace rental units damaged by the storm, are located within a target revitalization area, maximize the benefit for low to moderate income renters, and are *shovel ready*. Applicants with other sources of financing committed; that have demonstrated capacity; and that have prior recent experience working in a regulated affordable housing framework and an understanding of Federal regulations will also receive priority.

Use of Funds

CDBG Disaster Recovery funds will be used for acquisition and demolition of vacant land, new construction of rental housing or homebuyer properties or reconstruction of damaged units on the same lot. Eligible project costs include:

Development Hard Costs: The actual cost of constructing or rehabilitating housing including the cost of meeting the new construction standards in §92.251; demolishing existing structures; and making utility connections, including off-site connections from the property line to the adjacent street. Site improvements may include necessary on-site roads and sewer and water lines. For multifamily rental housing projects, the costs to construct or rehabilitate laundry and community facilities located within the same building as the housing and for the use of residents and their guests are also eligible.

Related Soft Costs: Other reasonable and necessary costs associated with the financing or development (or both) of new construction or acquisition of housing including architectural, engineering, or professional services required to prepare plans, drawings, specifications, or work write-ups; costs to process and settle project financing; costs of a project audit; costs to provide information services such as affirmative marketing and distributing fair housing information to prospective homeowners and tenants.

Environmental Review: Costs and release of funds directly related to the project.

Relocation Costs: The cost of relocation payments and other relocation assistance to persons displaced by the project are eligible costs.

Monitoring:

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

Start and End Date: July 2018 – December 2019

City of Columbia Canal Head Gates Project

Eligible Activity: Public Facilities and Improvements

National Objective: Urgent Need

Activity Allocation: \$4,000,000

Overview and Delivery

The Columbia Canal Head Gates are a critical component of the Columbia Canal facility, a multi-functional water supply utility. The Canal provides influent water to the City of Columbia Water Treatment Plant (WTP) for treatment and potable water supply to approximately 129,272 citizens as well as hospitals, universities, the State Capitol, Richland County and City municipal buildings, and police and fire stations. It also supplies potable water to the Fort Jackson military base, the McEntire Joint National Guard Base, and the hydro plant located at its southern end.

At its headwaters at the Canal's northern-most end, man-made Head Gates and a diversion dam function as a water inlet, channeling and controlling water from the Broad River into the Canal impoundment structure. The Head Gates' primary function is to control water levels within the Columbia Canal. Before the October 2015 storm, and under normal circumstances, the City operated the Head Gates to control water levels to ensure adequate water supply to both the WTP and the hydro plant. During high river flow, the Head Gates could be partially or completely closed to decrease water from the Broad River, allowing only enough to maintain adequate supply, but not so much as to inundate or damage the canal embankments. Under low river flows, the Head Gates would be opened to allow more water into the Canal to maintain critical water levels that sustain WTP and hydro plant operations. The Head Gates, along with ancillary components of the Columbia Canal, sustained severe damage during the October 2015 storm and have been inoperable since that time.

Connection to Disaster and Unmet Needs

The high precipitation and increased storm water drainage into the Columbia Canal during the October 2015 storm, created high velocity flows and a magnitude of debris that prevented the City from completely closing the Head Gates. Eventually, the only way to stop river flow into the Canal was to install bulkheads in front of the Head Gates. Despite the installation of the bulkheads, storm water flow and precipitation into the Canal was so high that the hydro plant was inundated and rendered inoperable and the Canal itself experienced a catastrophic breach below the intake to the Water Treatment Plant, just north of the hydro plant.

When the breach occurred, flows within the Canal suddenly increased and water rapidly drained into the Broad River. This high flow velocity out of the Canal damaged the Canal embankments and brought water in the Canal to critically low levels where water supply to the Water Treatment Plant could not be maintained. The City installed temporary pumps and piping to draw water directly from the Broad River and constructed a temporary cofferdam above the Canal embankment breach to restore water in the Canal to a level sufficient to operate the Water Treatment Plant. The cofferdam remains in place pending repair of the Canal embankment for which the City is in current discussions/negotiations with FEMA.

The temporary measures installed as a result of the October 2015 storm do not provide the City with an effective means to control water levels within the Canal, thus critically impacting the City's ability to provide a stable source of potable water to its residents and users. During high river flows and with adequate precipitation, the water levels are just adequate to maintain supply through the WTP intake. During low flows and summer season, when precipitation is low, water levels in the Canal fall below critical intake levels, requiring the City to turn off WTP pumps and reducing the City's water supply. Replacement of two (of 12) Head Gates will accomplish the following:

- Increase by a minimum of 17% the operational control of the City's water supply;
- Improve the City's current resiliency against future adverse weather conditions, including drought and severe storms by 17%;
- Stabilize the entire system by installing rock anchors, an improvement that increases stability by 100%;
- New improved head gate technology will increase the life span of the Canal by 20-30 years.

Use of Funds

The City proposes to replace two of the 12 Head Gates, which will restore partial operational control of Canal water levels, enabling the City to provide critical water supply to residents during times of low water flow into the Columbia Canal. Specifically, the City proposes the following repairs and improvements to the Head Gate structure on the Columbia Canal:

1. Design for the entire Head Gate structure and repair of Head Gates 1 and 2, replacing existing gear structure with industry standard screw technology to raise and lower gates, structural repairs
2. Installation of submerged debris diversion structure upstream of the Head Gate structure
3. Permanent blocking of the lock gate
4. Upgrade of the sensor system, camera, lighting, with appropriate power supplies
5. Raising of the head works east abutment embankment
6. Rock anchors to stabilize the Head Gate structure

Estimated Cost

Head Gates (12)			Head Gates (2)
Repairs	Cost		Cost
Masonry	\$368,000		\$61,333
Stabilization-Rock Anchors	\$659,000		\$659,000
Head Gate Replacement	\$2,668,000		\$444,666
New Winch System	\$1,218,000		\$203,000
Electrical Service	\$154,000		\$154,000
East Embankment Repairs	\$30,000		\$30,000
Remove Emergency Measures/Debris	\$750,000		\$125,000
Regulatory & Permitting	\$104,000		\$104,000
Design/Engineering	\$954,335		\$954,335
Subtotal	\$6,905,335		\$2,735,334
Mitigation	Cost		Cost
Tandem Screw Jacks	\$688,000		\$114,666
Trash Racks	\$2,316,000		
Trash Rake-Dragline	\$1,192,000		
Submerged Debris Diverter	\$300,000		\$300,000
Debris Holding Area	\$650,000		\$650,000
Permanent Block of Lock Gates	\$311,000		
Permitting/Regulatory Approval	\$104,000		
Lighting, Sensors, Cameras	\$200,000		\$200,000
Subtotal	\$5,657,000		
Total Cost	\$12,562,335		\$4,000,000

The cost estimate provided above originates from the FEMA PW 291 reversion for the repair of all twelve head gates. The columns on the right reflect the costs identified for the urgent repair of two head gates and the components needed to complete and protect the repairs.

Monitoring

Monitoring of program compliance will be performed by the Community Development Department in accordance with the City of Columbia CDBG-DR Monitoring Plan.

Start and End Date: July 2018 – December 2019

FEMA Hazard Mitigation Grant Program (HMGP) Match

Eligible Activity: Local Cost Share Match, 24 CFR 570 Acquisition & Disposition, 24 CFR 570.203(a)

National Objective: Urgent Need

Activity Allocation: \$2,000,000

On November 9, 2017, the date Action Plan Amendment #1 was submitted to HUD, the City received a notice of award for HMGP applications 269 and 270. In the interest of leveraging all potential funding sources, the City is requesting that \$2 million in CDBG funding previously allocated to the Columbia Buyout Program (CBP) be transferred to the FEMA HMGP Match program. If approved, the CBP will be closed and existing applicants will be transferred to HMGP Match. The HMGP Match Program will assist approximately 30 property owners still interested in selling homes damaged by the October 2015 flood in meeting the 25% local cost share match requirement.

Upon approval of this Action Plan Amendment, the Disaster Recovery case manager will contact the 16 eligible CBP applicants (one property owner sold his lot to a developer) to discuss the program change, explain how the City's decision will maximize disaster recovery funds, describe the next steps in the process, and answer any questions. The CDBG DR case manager will monitor the acquisition process for all participants and maintain all documentation necessary for program files.

The acquisition process is essentially the same for both programs, although appraisals, title searches, and the duplication of benefits analysis have already been completed for former CBP applicants. The City will request approval from HUD to adopt FEMA's environmental reviews. Boundary surveys will be scheduled and offer letters drafted and reviewed by the City Legal and Real Estate Departments before presenting closing documents for City Council approval and homeowner execution. Deed restrictions will mandate that all properties be demolished and dedicated in perpetuity to a public use compatible with open space, recreation, natural floodplain functions, ecosystem restoration, or wetlands management practices.

Connection to Disaster and Unmet Needs

Proper land use management is essential to any long-term recovery strategy. By purchasing properties that underwent substantial damage during the October 2015 flood, the City seeks to establish a safer, more sustainable development pattern that protects properties in the flood plain from future damage and creates opportunities for open space. Open spaces adjacent to waterways have numerous benefits for long-term flood recovery and resilience, including flood storage, reduced storm water runoff velocity, removal of pollutants, and protection of streambanks.

Under HMGP, the purchase price of these properties will be based upon the pre-disaster Fair Market Value (FMV) established by an independent appraisal less the Duplication of Benefits amount. Program funds will be used for property disposition costs including appraisals, surveys, asbestos testing and abatement, demolition and seeding. The City is considering options for future land use.

Eligible Applicants

Eligibility requirements for participants in this program are:

- Damaged owner occupied residences 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 October 5, 2015 storm.

- Applicants must have applied for FEMA HMGP under applications 269 or 270.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium.

Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity are not eligible.

Use of Funds

The City of Columbia proposes to use CDBG DR funds to meet the Local Cost Share Match of its FEMA Hazard Mitigation Grant Program. Owners will be paid the pre-disaster Fair Market Value of the damaged residence as determined by a primary-appraiser. The final award will be calculated after a duplication of benefit analysis.

Monitoring

Monitoring of program compliance will be performed by the City of Columbia's Community Development Department, in accordance with the CDBG-DR Monitoring Plan

Start and End Date: April 2018 – December 2018

6.1 Planning and Coordination

6.1.1 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.

6.1.2 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 continues to coordinate its flood recovery efforts with the South Carolina Disaster Recovery Office, Richland and Lexington Counties, and the Midlands Flood Recovery Group to share lessons learned and best practices and ensure uniformity and compatibility of

recovery data, duplication of benefit calculations, the environmental review process, and program design and implementation strategies. These coordinated efforts 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 and implementation 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
- St. Bernard Project (SBP)
- American Red Cross

6.2 Leveraging Funds

6.2.1 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, NFIP, 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 be examined to ensure all available funding is used where it is most needed.

On November 9, 2017, the date this substantial amendment was submitted to HUD, the City received a notice of award for the two HMGP applications. In the interest of leveraging all potential funding sources, the City is requesting that \$2 million in CDBG funding currently allocated to the Buyout Program be transferred to the newly proposed FEMA HMGP Match program. Property owners will be notified of the change in program; however, the acquisition process is essentially the same for both programs.

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.

6.2.2 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 available and how those sources can be combined to create a holistic solution to the issues facing residents and communities.

To maximize funding to assist low-to-moderate income households, the City has committed \$1 million in CDBG program income funding to the CDBG-DR Minor Repair Program to ensure adequate financial assistance is available to the majority of households with unmet recovery needs.

6.2.3 Economic Development

Small businesses in Columbia impacted by the October 2015 flood have relied on insurance, SBA loans, and private resources to address necessary storm repairs. Twenty three businesses responded to a solicitation of interest by the Office of Business Opportunities in June. Of those, none were capable of meeting the job creation or retention criteria. In response, the City is proposing the use of the LMI Area national objective to assist approximately ten firms located within a LMI census tract where 20% of residents are at or below poverty level and the business serves residents in a commercial corridor severely affected by the 2015 storm and resulting flood.

6.2.4 Infrastructure

The City intends to address most of its unmet infrastructure needs by utilizing the FEMA Public Assistance and Hazard Mitigation Grant Programs, but FEMA has denied funding for the repair of the Head Gates of the Columbia Canal, a critical facility that supplies the City's potable water. The City is proposing the use CDBG DR funds to complete this urgently needed project affecting the public's daily health and safety. No other funding sources are available for this work. In addition, the City will rely upon the South Carolina general fund allocation to provide up to 25% in match for local governments toward FEMA disaster recovery projects.

6.3 Protection of People and Property; Construction Methods

6.3.1 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, the 2012 International Property Maintenance Codes, HUD Housing Quality Standards, and City of Columbia floodplain 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.

Homes will be eligible for reconstruction in cases where the property has been completely destroyed, demolished, or where the estimated cost to repair the structure to municipal and program standards would be more expensive than reconstruction. Substantially damaged structures will be deemed to be in need of major rehabilitation. A

substantially damaged structure is one where the cost of restoring the structure to its *pre-storm condition equals or exceeds 50% of the pre-flood market value of the structure*. A building's classification of substantial damage relates to its damage as of the day of the storm. Any eligible structure determined to be substantially damaged must be rehabilitated in compliance with current building codes, elevated above base flood, and must incorporate resilience measures.

The City, through its contract with Landmark Consulting, has hired three housing inspectors and a Construction Manager whose responsibilities include ensuring that Green Building Standards are met using the Retrofit Checklist listed above. The Construction Manager will train inspectors and contractors on Green Building requirements, which will be memorialized in contracts and grant agreements, and will monitor construction progress to ensure compliance with these standards.

6.3.2 Quality of Construction, Bonding, and Warranties

To ensure quality construction, the City will require all contractors to meet standardized bonding and insurance requirements for CDBG-DR programs and ensure that contractors are appropriately licensed and have not been debarred from performing work on federally funded contracts. All contractors pre-qualified for work on the City's Community Development programs must 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 opportunities to appeal the quality of work on their properties. In order for a contractor to receive a final payment, property owners—must sign a *Completion of Work* form stating that all work has been performed to their satisfaction and in accordance with the construction contract. The City also will survey property owners during the warranty period by issuing a notice to the owner six (6) months from the date of final inspection and one 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.

6.3.3 Dam and Levee Work

The City is proposing an allocation of \$4 million in CDBG-DR funding to replace two of the 12 Head Gates on the Columbia Canal, which will restore partial operational control of Canal water levels and enable the City to provide critical water supply to residents during times of low water flow. An estimated \$170 million in project needs have been identified and submitted to the FEMA Public Assistance program for repairs to the Columbia Canal and Head Gates. It now appears unlikely that the entire scope as envisioned will be obligated for funding. FEMA has indicated they would obligate only \$11.7 million for the project. The City intends to reversion its original Project Worksheets to combine some work associated with the Canal with engineering and inspection services, and repairs to the hydroelectric plant. If approved for CDBG-DR funding under this Action Plan Amendment the City will 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.

6.3.4 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. On June 16, 2015, the Columbia City Council passed a floodplain ordinance requiring citizens who build new structures, make significant improvements to existing structures, or who have experienced significant damages greater than 50% of the value of the original structure) to residential and non-residential structures to rebuild with the bottom of the lowest finished floor at least two 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; constructed with materials and utility equipment resistant to flood damage; and 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 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.

6.3.5 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 formed to affect climate change, but 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 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 late 2017.

The cost of incorporating mitigation and resiliency measures into local building codes can be difficult to determine; however, 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, the highest return on investment.

6.3.6 Broadband Infrastructure

To extend affordable internet access to children and families living in federally assisted housing, HUD requires 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 also requires that grantees include these technologies in their program specifications for the substantial improvement of multifamily developments with four or more rental units.

Under this Action Plan Amendment, the City is proposing a multifamily affordable housing fund that will meet some of the critical needs for new affordable rental units in Columbia. Installation of broadband infrastructure is included in the rehabilitation and new construction guidelines for all CDBG-DR assisted rental properties with four or more ~~rental~~ units.

6.3.7 Disaster-Resistant Housing

The need for sustainable, disaster resistant housing has escalated as the number and ferocity of tropical storms and hurricanes increases. In 2016, the US experienced the highest amount of tropical cyclone activity in the Atlantic Basin since 2010 with 15 named storms – the first forming in January - seven hurricanes and four major hurricanes (Category 3 and above) from June 1 – November 30. Damage is estimated at \$16.1 billion. With eight hurricanes in the Atlantic Basin from August 9 – September 29, a first in 124 years, 2017 is already among the top ten most active in history and the first to experience three Category 4 hurricanes (Harvey, Irma and Maria) in a single year. This year is expected to tally as one of the costliest ever registered for natural disasters with a preliminary total of more than \$186.8 billion.

Under these conditions, building safer, stronger, more resilient housing is paramount to the City of Columbia's long term viability and growth. In an article published on Huduser.gov, Lawrence Vale, MIT, suggests that cities cannot demonstrate the capacity for resilience unless it is rooted in the provision of affordable housing to the least advantaged residents. Disasters compound pre-existing inequality because low income groups typically have no safety net. Based upon the reallocation strategy proposed in this Action Plan Amendment, 64% of CDBG-DR funding will be provided to construct, rehabilitate, and reconstruct more resilient housing. The following three main programs prioritize the recovery needs of the City's most vulnerable populations:

Multifamily Affordable Housing Fund

The proposed Multifamily Affordable Housing Fund will provide energy efficient, environmentally sensitive, attractive housing that creates access to educational and employment opportunities, connects residents to social systems and resources, and promotes the health and wellbeing of all its residents, particularly the least advantaged. The City will use CDBG Disaster Recovery funds to finance the acquisition and demolition of vacant land, new construction of rental housing or homebuyer properties, and/or reconstruction of damaged units on the same lot in one of its nine neighborhood revitalization areas, thus extending its long-term vision for a healthy, vital community. Eligible project costs include construction, demolition, site improvements, engineering and other professional services, environmental review and relocation services. Any tenants displaced by the October 2015 Flood will receive first priority for these rental units.

Columbia Homeowner Assistance Program (CHAP)

Many homeowners in Columbia did not wait for federal assistance to make storm damage repairs. In particular, homeowners with major and severe damage appear to have found the means to rehabilitate on their own or found other assistance, some through volunteer organizations. Collectively, United Way and the flood recovery partners have repaired more than 200 homes in the Midlands, work made possible by generous donors and volunteers and the support of the Columbia community. Currently, there are 15 eligible homeowners in CHAP. Based on current damage assessments, we expect to serve approximately 50 homeowners in this program.

Small Rental Repair Program (SRRP)

Based on preliminary damage assessments the City is proposing a decrease in the funding cap from \$150,000 to \$100,000 per property and reducing the number of years for maintaining affordable rates from three years to two years to attract more landlords to participate in the Small Rental Repair Program. Repairs will include work to address compliance with city building codes and Housing Quality Standards, environmental remediation, energy efficiency, and Green Building standards, making the units more resistant to future storms. We anticipate most repairs will cost between \$25,000 and \$50,000 per unit not including the cost of environmental remediation, allowing us serve approximately 50 properties. Tenants displaced by the storm will be accommodated first in restored units.

Minor Repair Program (MRP)

The Minor Repair Program provides funding up to \$25,000 to repair rain/flood damages as well as work related to environmental remediation, energy efficiency, Green Building improvements, and meeting the International Property Maintenance Code and Housing Quality Standards, thus ensuring these housing units are more resilient to future natural hazards. As our housing inspectors begin to assess damages across all programs, we are finding that many applicants to MRP actually have more severe damage than expected, usually as a result of the amount of time the properties have gone untouched. Applicants who have more than \$25,000 in damage and meet the income eligibility requirements of CHAP, will be moved into that program. The City is proposing an increase in funding of \$2,554,070 to serve more low and moderate income households, giving the elderly, disabled, and female headed households with children first priority.

In addition to these programs, the City will ensure that the needs of the following populations are met through continued collaboration and prioritizing the unmet needs of vulnerable populations.

6.3.7.1 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 community housing issues and 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 identified.

6.3.7.2 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 all 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.

6.3.7.3 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. Programs also are funded using CDBG Entitlement allocations to support small businesses and create economic and job opportunities for special needs and vulnerable populations.

6.3.7.4 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%
Total		18,367	16,264	89%	2,103	11%

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%)
Total	18,367	12,567 (68%)	3,774 (21%)	512 (3%)	133 (1%)	87 (0%)	637 (3%)	657 (4%)

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%
Total		18,367	1,008	5%

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.

6.3.8 Minimize or Address Displacement (Uniform Relocation and Real Property Acquisition Act or 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 tenants permanently displaced by CDBG-DR project activities will be provided relocation benefits in accordance with URA requirements.

The City's CDBG Disaster Recovery housing programs may result in temporary household displacement. To comply with the URA, the City has developed policies and procedures covering all probable types of relocation assistance that may be necessary in accomplishing disaster related housing rehabilitation activities. Consistent with the goals and objectives of the URA, the City will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- Evaluate housing codes and rehabilitation standards and code enforcement in reinvestment areas to prevent undue financial burden on established owners and tenants.
- Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
- Assist persons who must be relocated temporarily during rehabilitation in finding suitable living arrangements.
- Establish counseling centers to provide homeowners and tenants with information on services available to help them.
- Where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement.
- If feasible, demolish or convert only dwelling units that are not occupied or structures that have not been used for residential purposes.
- Target only those properties deemed essential to the success of the project.

CDBG Disaster Recovery case managers will assess the household needs of those being temporarily displaced and provide housing advisory assistance and referrals to community resources. Case managers will first identify and inspect available rental units to ensure they meet Housing Quality Standards (HQS). If the displaced household identifies their own temporary unit, the case manager will inspect the unit to ensure that it meets HQS, is reasonably priced, and accommodates the needs of the household.

URA assistance must be determined to be reasonable and necessary according to established policies. Payments will be made to the member of the displaced household responsible for paying the appropriate authority in a timely and efficient manner. Eligible expenses include moving expenses, meals, storage, and the difference between the rent at the temporary unit and permanent unit. Displaced households will be encouraged to temporarily relocate with friends or family. One half of Fair Market Rent (FMR) will be offered to friends and family who agree to temporarily house displaced households to offset costs associated with increased usage of electricity, water, etc.

6.3.9 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.

6.3.10 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.

The City is developing a comprehensive Quality Assurance/Quality Control Plan (QA/QC) governing all CDBG-Disaster Recovery programs to ensure compliance with federal regulations, complete and accurate project files, and accuracy of program calculations and benefits. The Plan also identifies issues relating to compliance with HUD regulations, implementation of best practices for disaster recovery, ensuring quality design and construction, and maintaining integrity and public confidence in the program. The plan will include the following areas of review:

- Applicant Intake Documentation & Prioritization for Assistance
- Eligibility and National Objective Determination
- Duplication of Benefit (DOB) analysis
- Calculation of Applicant Grant Awards
- Environmental Clearance (Tier II and Section 106 review)
- Project scoping in relation to Minimum Program Standards (MPS) for construction and environmental remediation activities (LBP and asbestos)
- Construction (field monitoring and cost reasonableness)
- Uniform Relocation Act (URA) compliance
- Close out

6.3.10.1 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.

6.3.10.2 Applicant Monitoring

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.

6.3.10.3 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*.

6.3.10.4 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.

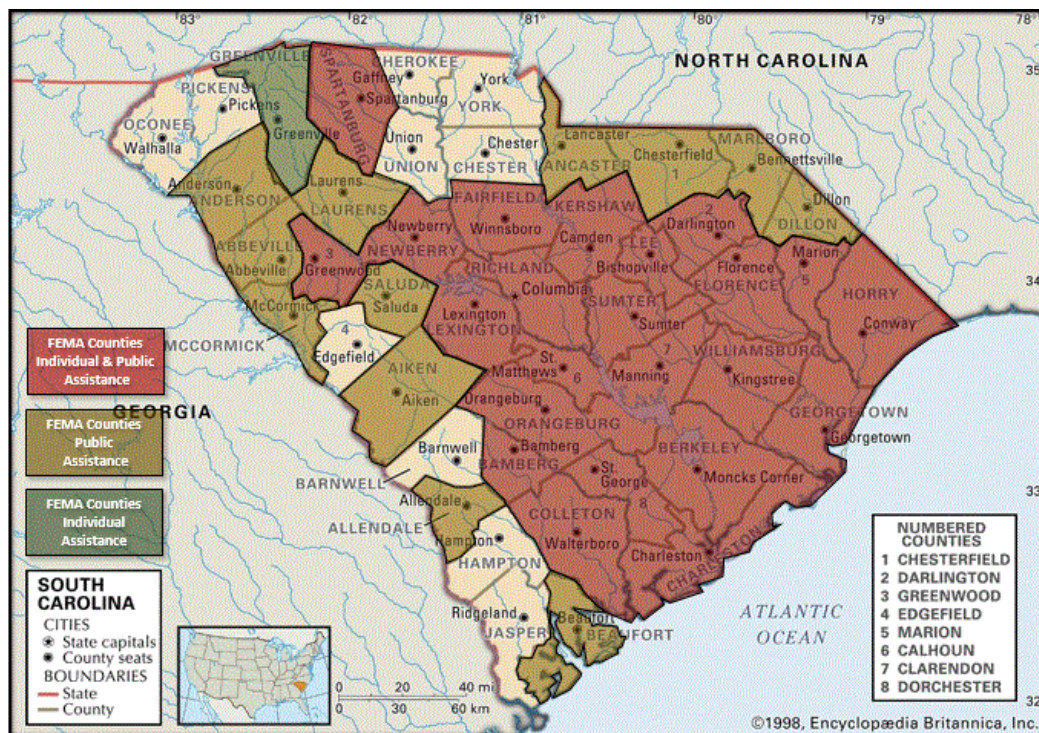
In addition to grant agreements and contracts, individual program CDBG-DR staff, subrecipient staff, program applicants, and contractors/contracted staff will be required to sign a disclosure form regarding potential conflicts of interest as they relate to the city

(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. 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. The City of Columbia evaluated the FEMA Programmatic Agreement (PA) and Addendum to streamline the environmental clearance process and signed the FEMA Addendum on March 2, 2017. Additional mitigation and/or treatment measures 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 Amendment.

8. 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 hosted a public meeting September 14, 2017 at Earlewood Park to introduce the Action Plan Amendment program modifications and budget reallocations and solicit public comments. A notice published in *The State* on September 3, 2017 informed citizens of the meeting and how to register comments. The public comment period ended September 29th after receiving only four comments. On October 17, 2017 the Community Development Director presented an overview of this Action Plan Amendment and responded to comments from the City Council and general public. Subsequently, the City published a second notice on October 18, 2017 announcing an extended public comment period from October 18 - November 1, 2017.

On November 9, 2017, the date Action Plan Amendment #1 was submitted to HUD, the City received a notice of award for HMGP applications 269 and 270. In the interest of leveraging all potential funding sources, the City is requesting that \$2 million in CDBG funding previously allocated to the Columbia Buyout Program (CBP) be transferred to the FEMA HMGP Match program. A Public Notice describing these changes was published in *The State* on January 11, 2018. No comments were received during the 14 day comment period from January 11 through January 25, 2018.

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 Amendment and subsequent notices will be posted in *The State* newspaper and 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 also displays 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 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
- 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

It is the policy of the City of Columbia to review all complaints received. Citizens have an opportunity to register comments or complaints by email, letter, telephone, or in person. Written complaints will be referred to the appropriate administrator for response. A written response will be made within 15 working days of receipt of complaint. A copy of the written complaint and response will be maintained by the Community Development Department. Complaints concerning the general administration of the CDBG Disaster Recovery Program may be submitted to:

Columbia CDBG Disaster Recovery Program
Community Development Department
1225 Lady Street, Suite 102
PO Box 147
Columbia, SC 29201
CityRecoveryDR@columbiasc.net
803-545-4668

The following procedures will be followed on all complaints received by the CDBG Disaster Recovery Manager, Columbia Community Development Department. The initial complaint may be expressed orally or in writing.

- The CDBG Disaster Recovery Manager will notify the Director of Community Development of the complaint, investigate the complaint, and report the findings to the Grievance Committee within eight (8) business days.
- The Grievance Committee will notify the complainant in writing of its findings within seven (7) business days.
- If the complainant disagrees with the Grievance Committee's findings, he/she must notify the CDBG Disaster Recovery Manager in writing that he/she desires a hearing by the Grievance Committee for review and reconsideration. The CDBG Disaster Recovery Manager will notify the complainant in writing of the hearing date.
- The complainant must bring all relevant data, witnesses, etc., to the hearing. The Director of Community Development will address the complaint and within fifteen (15) days forward to the

complainant a certified copy of the decision rendered.

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.

As part of its grievance procedures, the City has established a Grievance Committee comprised of three members of the Citizens Advisory Committee and the CDBG Disaster Recovery Manager. The Committee provides a means to respond to the concerns of CDBG Disaster Recovery Program applicants or the general public relating to Disaster Recovery activities, rules and decisions. The grievance process provides a way for an applicant's concern to be heard and responded to by a committee of peers.

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, 2016 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.

As part of its public outreach to potential applicants, the City hosted eight outreach sessions from July 10 – August 2; total attendance was 135. Press Releases were sent to approximately 70 local media organizations and interviews were conducted by several television and radio stations. The Columbia

Public Relations Department issued a press release July 10 announcing the final eight public information sessions. A notice with photos taken at one of the initial public information sessions was posted on YouTube and received 149 views. Program information was posted on City Talk July 14. WISTV posted a notice on its website July 18; ABC Columbia posted notices on its website July 10 and July 30. The Community Development Executive Director and Disaster Recovery Manager appeared on WIS TV August 1 to discuss DR program. PR issued a press release and outreach flyer on August 2 announcing final public information session.

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) has completed its Tier I Environmental Reviews and Request Release of Funds for major and minor rehabilitation of residential, single family units as well as for elevation reimbursement activities. HUD granted an Authorization to Use Grant Funds on August 24, 2017. The City will procure a professional services firm to conduct Tier 2 Site Specific Reviews for housing rehabilitation activities Categorically Excluded Subject to 58.5. On March 2, 2017, the City adopted South Carolina's FEMA PA and executed an Addendum to expedite Section 106 reviews of CDBG-DR funded projects. The firm selected will include on its staff an architectural historian that meets the Secretary of the Interior's Professional Qualification Standards and has been approved by HUD.

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. A revised Procurement Policies and Procedures is included in this Action Plan Amendment at Exhibit F.

8.5.7 Information Technology (IT)

The City's Program Management contractor developed a system to track all applications and report on CDBG-DR program status, expenditures, performance measures and demographics. A separate Sharepoint system has been developed to retain program documentation and become the repository for the auditable files.

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 has implemented a robust case management approach for individual applicants, who are assigned a Case Manager that remains connected to that household from intake through closeout, acting as a liaison with housing inspectors, environmental personnel, construction contractors, etc. This decision was based upon estimated number of eligible applicants and the qualifications and experience of case management staff.

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, has customized communication policies and procedures for each housing program involving CDBG-DR funding. Case managers communicate to program applicants via in person meetings, emails, phone

calls, and letters during all phases of program activities from applicant intake to close out. All applications are part of a database designed to track applicant status and demographics. The system automatically generates an email (or letter) to the applicant whenever a change in status or program phase occurs. Case Managers also are required to follow up with an email and/or phone call a minimum of 15 days after the initial meeting and within 15 days of requesting specific documentation. Letters of preliminary eligibility are generated on the date the case manager determines that the application is complete and all documentation has been received. 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

All applicants are given 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 Managers will also be required to call to notify the applicant regarding the outcome of their claim and explain that they will receive a response letter via regular mail. The City's Grievance Procedures are described in Section 8.2, Citizen Grievances or Complaints, of this Action Plan Amendment

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, 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, as discussed in Section 6.3.10, Monitoring Standards and Procedures, 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. 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
Total	\$404,350

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. Action Plan Amendment #1 was submitted for review and approval by the City Council on October 17, 2017.

10. Appendix

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.

- l. 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.

Teresa Wilson, City of Columbia City Manager

Date

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 28th 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 contractor 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/documented 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.

September 14, 2017 Public Meeting

The City hosted a public meeting September 14, 2017 at Earlewood Park to introduce the Action Plan Amendment program modifications and budget reallocations and solicit public comments. A notice published in *The State* on September 3, 2017 informed citizens of the meeting and how to register comments. The public comment period ended September 29th. On October 17, 2017 the Community Development Director presented an overview of this Action Plan Amendment and responded to comments from the City Council and general public. Subsequently, the City published a second notice on October 18, 2017 announcing an extended public comment period from October 18 - November 1, 2017.

Comment 37

Comment: One participant inquired about the possibility of there being another amendment added and if adding another amendment would cause a delay in the program process.

Response: The CDBG-DR Program expects that another substantial amendment may be necessary in approximately 12 months; however, the process should not cause any program delays for current applicants.

Comment 38:

Comment: One participant inquired if another amendment needed to be added, could the CDBG-DR Program send out a notice to all applicants informing them of the program's status.

Response: The CDBG-DR Program will make an effort to notify all current applicants of proposed changes to the Action Plan. All substantial amendments must follow the same citizen participation process as the original Action Plan: an advertisement published in the journal of record, *The State*, will announce the date, place and time of public meetings held to discuss proposed amendments and all notices and amendments will be posted on the CDBG-DR website for 14 days to allow adequate public comment.

Comment 39:

Comment: One participant requested more information regarding what items are covered in the FEMA Hazard Mitigation Grant Program (HMGP).

Response: The City posts monthly updates to all Recovery programs, including HMGP, on its Disaster Recovery website. Eligibility requirements for HMGP are different than the CDBG-DR program and FEMA funds only 75% of the acquisition cost. Action Plan Amendment #1 proposes to leverage \$1 million in CDBG-DR funds to finance the 25% Local Cost Share to assist those homeowners in the HMGP.

Comment 40:

Comment: One participant inquired if this amendment will alter the Columbia Buyout Program and the current participants who have submitted an application.

Response: No program changes are being proposed for the Buyout Program; however, funding is expected to cover only eligible applicants currently in the program.

Comment 41:

Comment: One participant inquired if any of the programs are still accepting applications.

Response: All programs are currently accepting new applications.

Comment 42:

Comment: One participant inquired if the CDBG-DR Program expected to receive 350 Minor Repair Program applications.

Response: Given the current rate of applications in the process, the Minor Repair Program is expected to fund approximately 350 applications.

Written Comments Submitted via the Disaster Recovery Website

Comment 43:

Comment: One participant felt that the program should complete the buyout process before working on an amendment because it has created unnecessary suffering for applicants.

Response: The CDBG-DR process can appear plodding and painfully slow because of the necessary compliance factors. The City is working to improve the pace as much as possible. Some program activities may take longer than anticipated, but we appreciate the patience of all of the applicants.

Comment 44:

Comment: One participant urged the Disaster Recovery Program to include reimbursement to applicants who have already started to repair their homes.

Response: The proposed Action Plan Amendment #1 includes reimbursement of necessary and reasonable expenses for storm related repair costs completed within one year of the October 2015 Flood for the Small Rental Repair and Minor Repair programs.

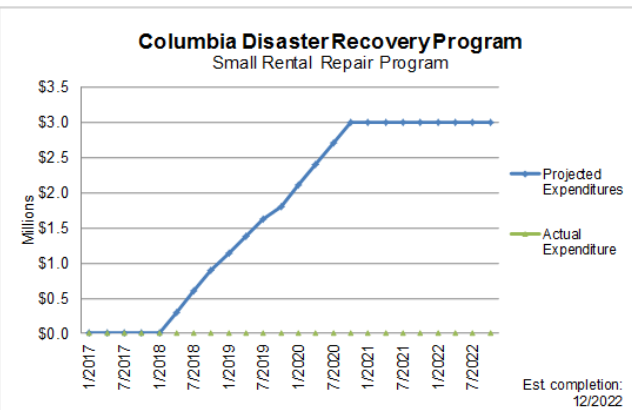
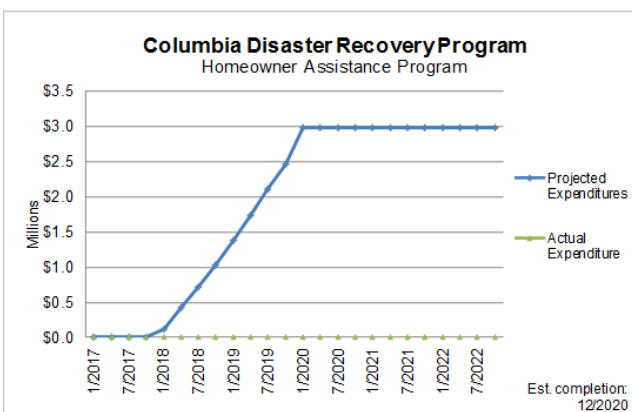
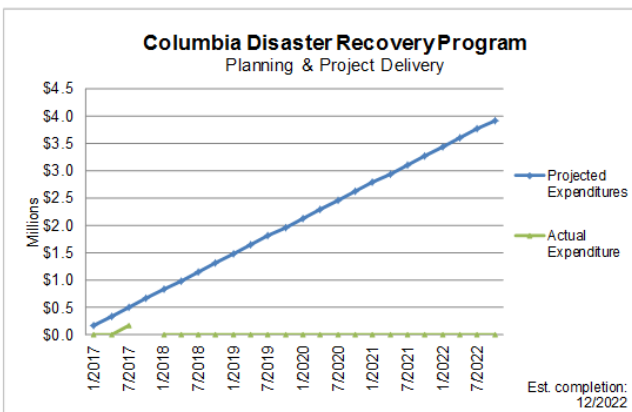
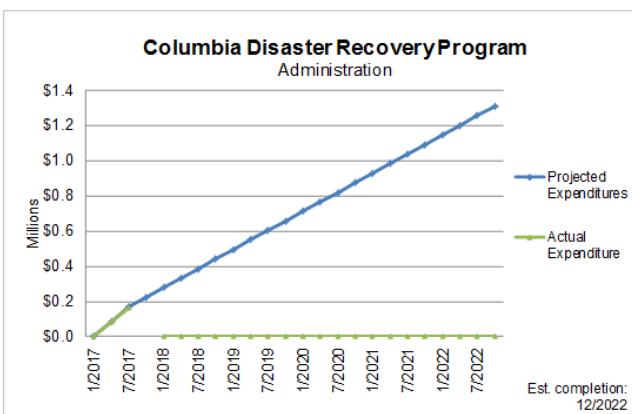
Comment 45:

Comment: One participant stated that the CDBG-DR Program helps landlords to maintain their property with the funding.

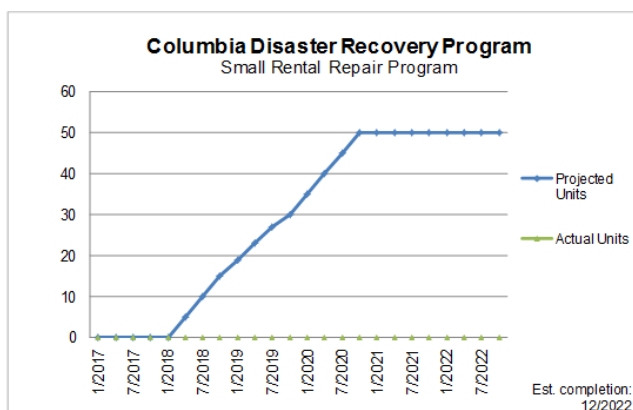
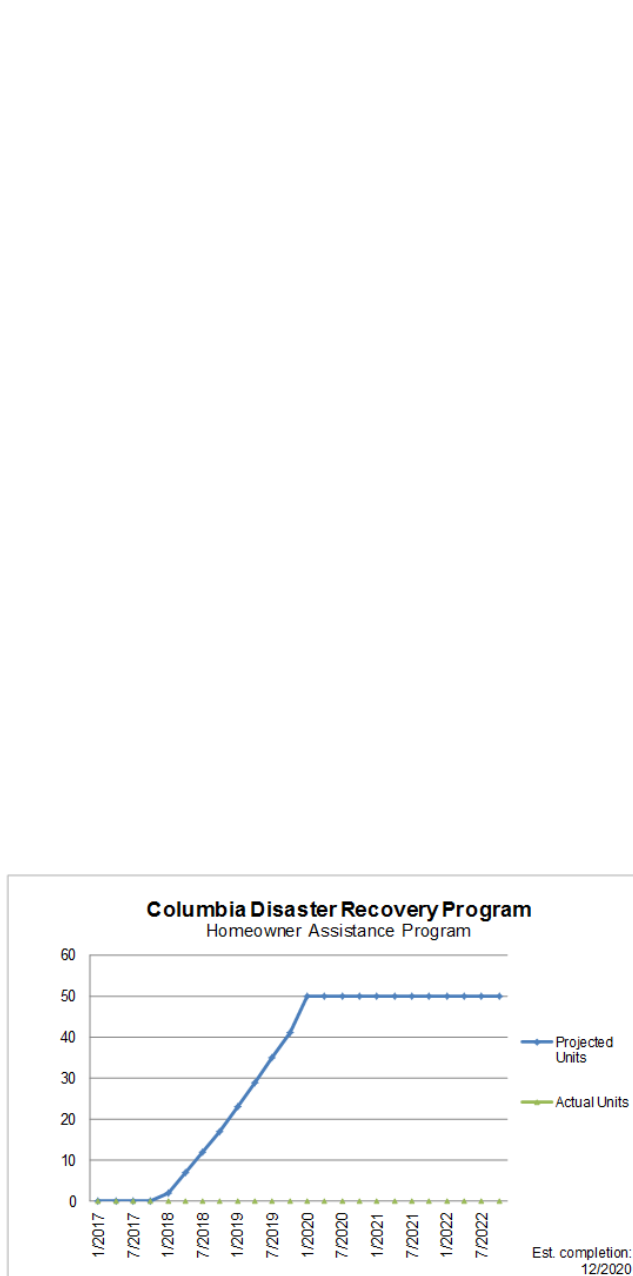
Response: CDBG-DR funds cannot be used for maintenance costs; however, landlords who agree to rent to low-to-moderate income tenants for two years after construction is completed are eligible for up to \$100,000 for the repair of storm related damages to their rental units.

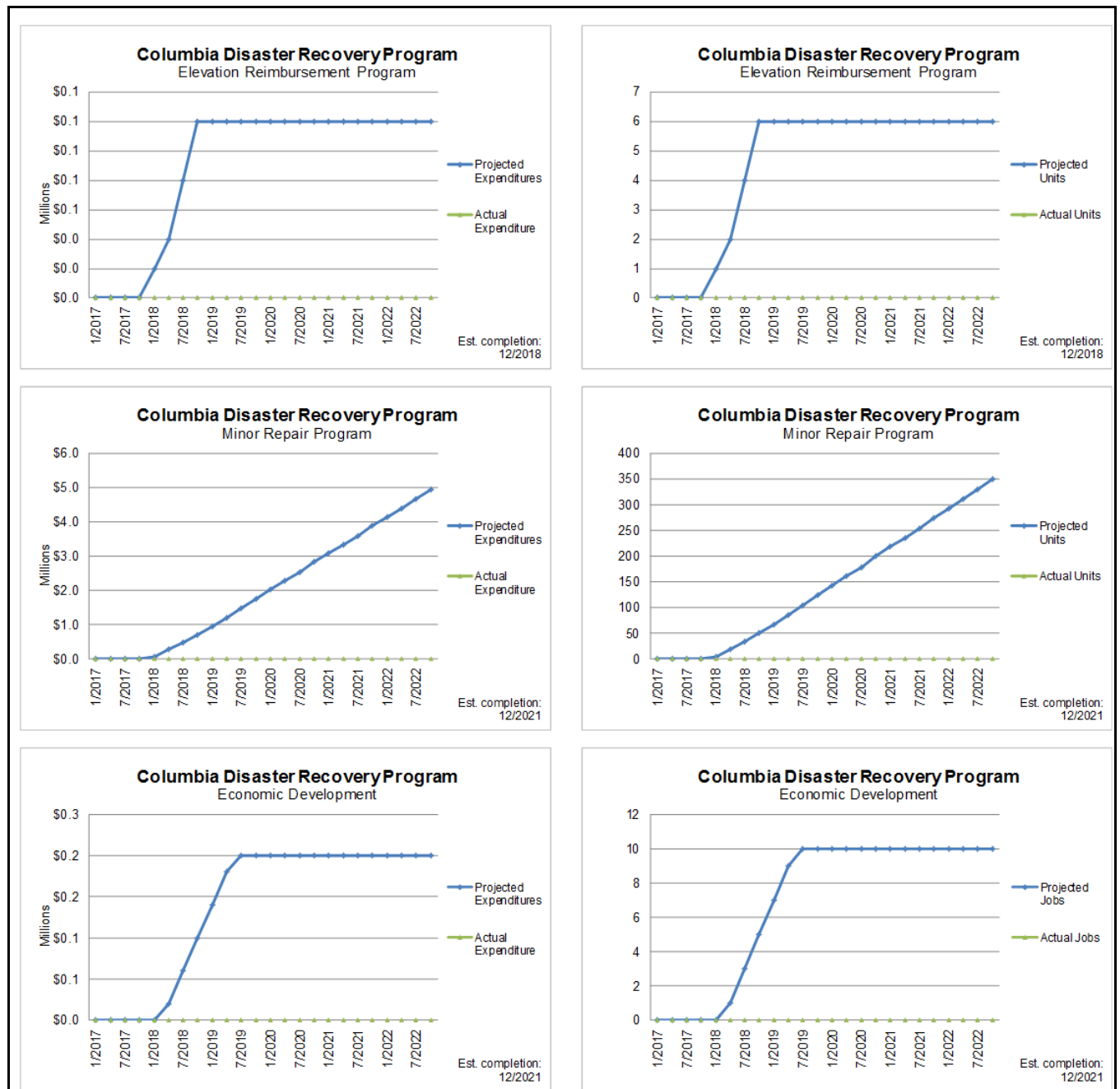
Exhibit C – Revised CDBG-DR Expenditure Projections (December 1, 2017)

Financial

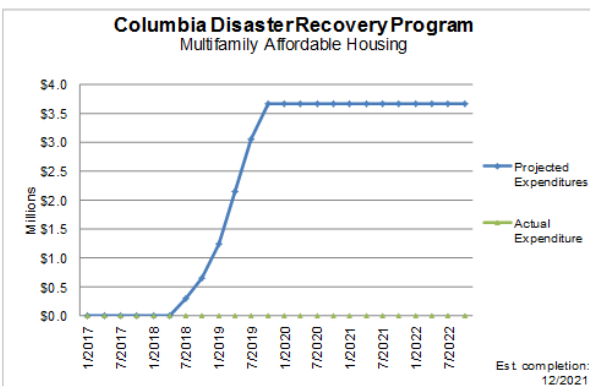
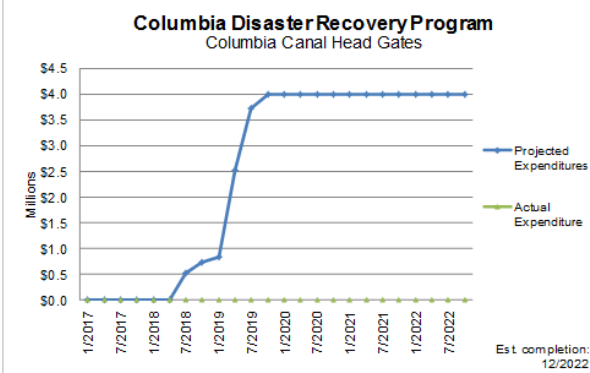
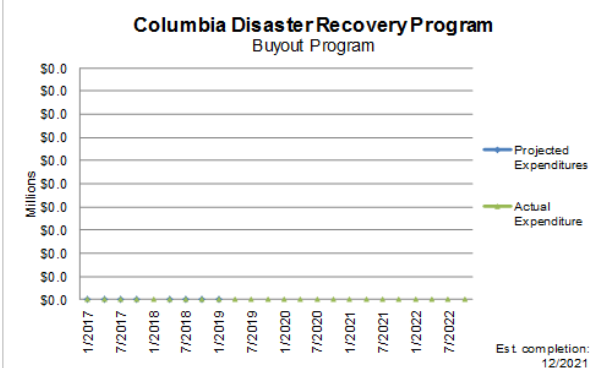
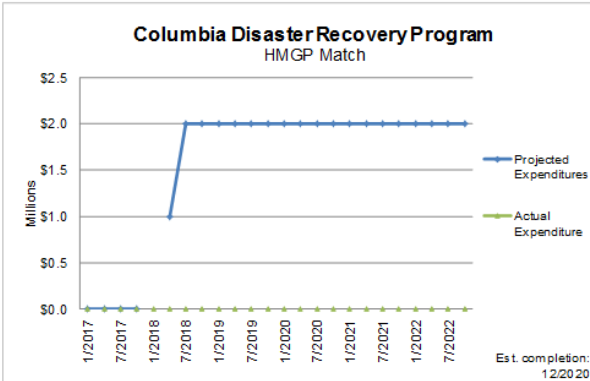


Performance

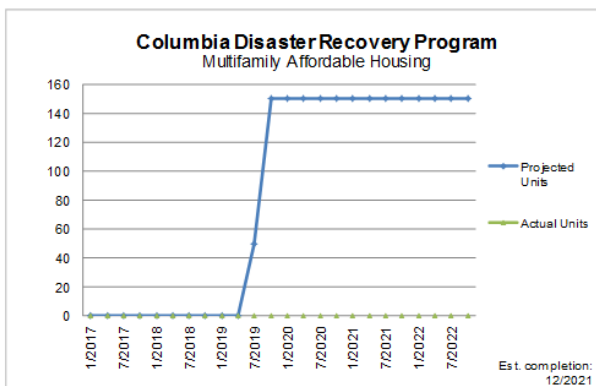
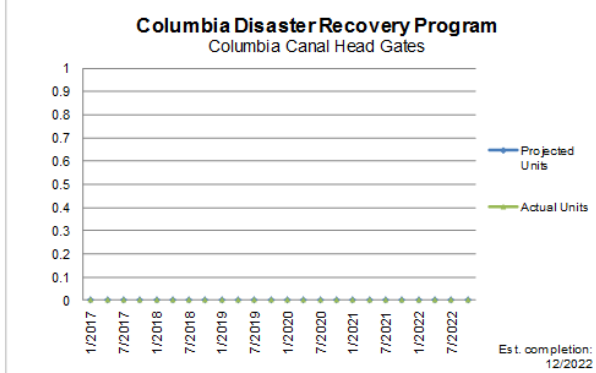
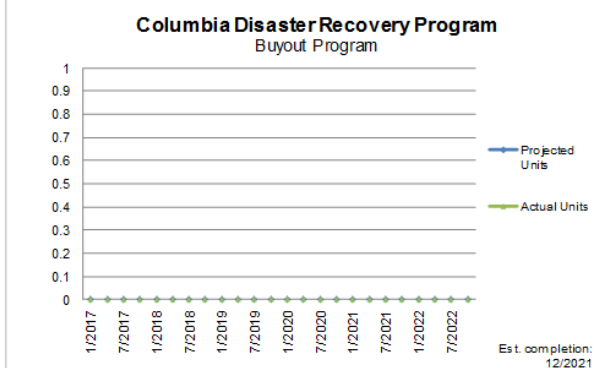
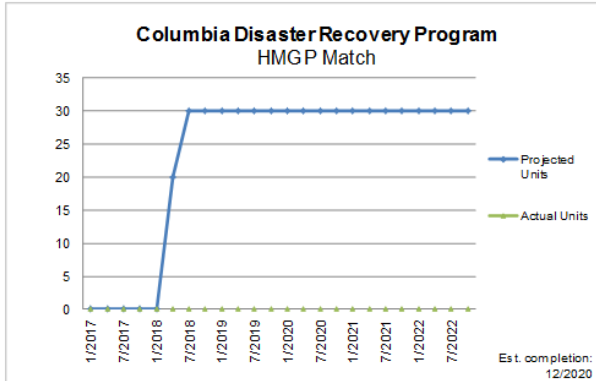




Financial



Performance



Financial Projections (Updated December 1, 2017)

Performance Projects (continued)[illegible]

Action Plan Projections, December 21, 2016

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								


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 type="text"/>		4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>	
State Use Only:			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:			
* a. Legal Name: <input type="text"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/>		* c. Organizational DUNS: <input type="text"/>	
d. Address:			
* Street1:	<input type="text"/>		
Street2:	<input type="text"/>		
* City:	<input type="text"/>		
County/Parish:	<input type="text"/>		
* State:	<input type="text"/>		
Province:	<input type="text"/>		
* Country:	<input type="text"/>		
* Zip / Postal Code:	<input type="text"/>		
e. Organizational Unit:			
Department Name: <input type="text"/>		Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	<input type="text"/>	* First Name:	<input type="text"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text"/>		
Organizational Affiliation: <input type="text"/>			
* Telephone Number:	<input type="text"/>	Fax Number:	<input type="text"/>
* Email:	<input type="text"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-228"/> CFDA Title: <input type="text" value="Community Development Block Grant Disaster Recovery (CDBG-DR)"/>	
* 12. Funding Opportunity Number: <input type="text" value="FR-5938-N-01"/> * Title: <input type="text" value="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"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div><input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="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	
16. Congressional Districts Of:	
* a. Applicant	SC-002
* b. Program/Project	SC-002
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	11/04/2016
* b. End Date:	11/04/2022
18. Estimated Funding (\$):	
* a. Federal	19,989,000.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	1,000,000.00
* g. TOTAL	20,989,000.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input 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.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
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)	
<input checked="" type="checkbox"/> ** I AGREE	
** 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.	
Authorized Representative:	
Prefix:	Ms.
* First Name:	Teresa
Middle Name:	B.
* Last Name:	Wilson
Suffix:	
* Title:	City Manager
* Telephone Number:	803-545-3026
Fax Number:	803-545-3051
* Email:	tbwilson@columbiasc.ent
* Signature of Authorized Representative:	
* Date Signed:	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 Register Notice? **Yes**

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

Criteria:		Yes (provide page #)	No (provide)
A. General Action Plan Requirements			
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?		Yes (Pages 1, 5, 32-57)	
(1) Needs Assessment	An impact and unmet needs assessment, as described in the Notice: (a) Does the assessment evaluate the three core aspects of recovery – housing, infrastructure, and economic revitalization? (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? (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? Does the grantee assess whether public services are necessary to complement activities intended to address housing and economic revitalization needs? (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? (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? (h) Does the assessment take into account the costs of incorporating mitigation and resiliency measures to protect against future hazards?		
		Yes (Pages 1, 5, 32-57)	
		Yes (Pages 11-16, 27-28, 45)	
		Yes (Pages 32-45)	
		Yes (Pages 13-16, 27-28, 45)	
		Yes (Pages 32-45)	
		Yes (Pages 18-26)	
(2) Connection between Needs and Allocation(s) of Funds	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?	Yes (Pages 32-45)	
(3) Planning & Coordination	(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) How the grantee will coordinate with other local and regional planning efforts to ensure consistency?	Yes (Pages 58-59, 60-65)	
		Yes (Pages 58-59)	
(4) Leveraging Funds	How the grantee will leverage CDBG disaster recovery funds to generate a more effective and comprehensive recovery?	Yes (Pages 59-60)	

(5)	Protection of People and Property; Construction Methods	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)	Elevation Standards	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)	Public Housing, HUD-assisted Housing, and Housing for the Homeless	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)	Broadband Infrastructure	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)	Disaster-resistant Housing	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: (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? (b) Prevention of low-income individuals and families with children (especially those with incomes below 30 percent of median) from becoming homeless? (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)? (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 66-69)	
			Yes (Pages 12-16, 27-28, 45)	
			Yes (Pages 8-10, 12-16, 65)	
			Yes (Pages 13-16, 65)	
			Yes (Pages 6-8, 13-16)	
(10)	Minimize or Address Displacement	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)	Program Income	How the grantee will manage program income, and the purpose(s) for which it may be used?	Yes (Page 69)	
(12)	Monitoring Standards and Procedures	(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. State Grantees Only				
tion Plan describe:			N/A	
(13)	Description of MOD or Programs/Activities	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)	Basis for Allocations	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)	Program/Activity Details	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? (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 uses relate to a specific impact of the disaster and will result in long-term recovery? (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	
			N/A	
			N/A	
			N/A	
(16)	Criteria to Determine Method of Distribution	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	

C. Local Government Grantees Only			
Does the Action Plan describe:			
(17)	Description of Programs/ Activities	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?	Yes (Pages 46-57)
(18)	Basis for Allocations	How the needs assessment informed the allocation determinations?	Yes (Pages 46-57)
(19)	Program/Activity Details	<p>For each program or activity that will be carried out by the UGLG or through a subrecipient:</p> <p>(a) The projected uses of the CDBG-DR funds, including the administering entity, budget and geographic area?</p> <p>(b) The threshold factors or applicant eligibility criteria, grant size limits and proposed start and end dates?</p> <p>(c) How the projected use will meet CDBG eligibility criteria and a national objective?</p> <p>(d) How the projected use relates to a specific impact of the disaster and will result in long-term recovery?</p> <p>(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?</p> <p>(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</p>	<div>Yes (Pages 46-57)</div> <div>Yes (Pages 46-57)</div> <div>Yes (Pages 46-57)</div> <div>Yes (Pages 46-57)</div> <div>Yes (Pages 46-57)</div>
D. Location, Mitigation Measures, Use of Urgent Need			
(20)	Presidentially-declared County	Are, or will, all activities be located in a Presidentially-declared county that is eligible for assistance under this Notice?	Yes (Page 73)
(21)	Mitigation Measures	Are mitigation measures a necessary expense related to the disaster relief, long-term recovery, and restoration of infrastructure, housing, or economic revitalization?	Yes (Page 73)
(22)	Use of Urgent Need	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?	Yes (Page 73)
E. Clarity of Plan and Citizen Participation			
(23)	Clarity	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)?	Yes
(24)	Budget	Does the Plan include a chart or table that illustrates, at the most practical level, how all funds are budgeted?	Yes (Pages 1, 5)
(25)	Time for Citizen Comment	Did the grantee provide at least fourteen days for citizen comment and ongoing citizen access to information about the use of grant funds?	Yes (Pages 74-76, 82)

(26)	Publication	Was the proposed Plan published before its adoption? Note: Correct answer is "yes".	Yes (Pages 74-76, 82)	
(27)	Publication	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)	Website	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)	Consultation	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)	
E. Clarity of Plan and Citizen Participation (cont.)				
(30)	Accessibility	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)	Receipt of Comments	Did the grantee provide a reasonable timeframe and method (including electronic submission) for receiving comments on the plan?	Yes (Pages 74-76, 89)	
(32)	Substantial Amendment	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)	Summary of Public Comments	If comments were made, does the Plan include a summary of those comments and the grantee's response?	Yes (Pages 89-99)	
(34)	Consistency of Budget	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)	Citizen Complaints	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)	Risk Analysis Documentation	Has the grantee submitted the Risk Analysis Documentation as described in the Notice?	Yes (Pages 77-83)	
(36)	CDBG-DR Certifications	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)	SF-424	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)	
G. Conclusion				
(39)	Complete and Compliant	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)	Pre-Award, Pre-Agreement, and Reimbursement	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)	Uniform Relocation Act	Grantees must also define "demonstrable hardship" and "not suitable for rehabilitation" in the Action Plan or in policies and procedures.	Yes (Page 85)	

(42)	Deadlines	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?	Yes (Pages 86, 100-107)	
(43)	Most impacted and distressed	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?	Yes (Page 85)	
(44)	Approved	Is the Plan approved?	Yes (Page 85)	
(45)	Reason(s) for Resubmittal	If the Plan needs to be re-submitted, please indicate the reasons.	*See HUD Letter & City Response	

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>j. The grantee certifies that it has adopted and is enforcing the following policies. In addition, States receiving a direct award must certify that they will require UGLGs that receive grant funds to certify that they have adopted and are enforcing:</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>k. 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>l. The grantee will not use grant funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the State, local, or Tribal government or delineated as a special flood hazard area 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>m. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.</p>	Yes
<p>n. 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>	

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

The City receives monthly updates on SBA loans made to repair storm damages; however applicants are required to submit information on all funding received during the application intake process. Case Managers also use third party verification procedures to properly document applicant files.

Staff Responsible for Conducting DOB Analysis

The Disaster Recovery Case Managers completed application intake and the initial screening of all documentation submitted by applicants and ensured that all possible duplicative sources of assistance are discussed and disclosed by the applicant. After the application is complete, the Case Manager will verify all third-party sources of funding and perform the DOB analysis as outlined in program policies and procedures. Prior to providing CDBG-DR assistance, a Quality Assurance/Quality Control (QA/QC) review will be conducted 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 assigned Case 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 Case 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 Case Manager will also be responsible to ensure that any reduction of award or recapture occurs in accordance with the Grant Agreement or Cooperative Endeavor Agreement.

Exhibit F – Procurement Policies and Procedures



CDBG DISASTER RECOVERY PROCUREMENT POLICY

APRIL 1, 2017

**CDBG DISASTER RECOVERY PROGRAM
DISASTER RELIEF ACT OF 2016
PUBLIC LAW 114-113
DECEMBER 18, 2015**

CITY OF COLUMBIA COMMUNITY DEVELOPMENT DEPARTMENT

CDBG DISASTER RECOVERY PROCUREMENT POLICY

These procedures are intended to serve as guidelines for the procurement of supplies, equipment, construction services and professional services for the City of Columbia Community Development Block Grant (CDBG) Disaster Recovery Program. These guidelines meet state requirements and the standards established in §2 CFR 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (formerly 24 CFR 85.36).

CODE OF CONDUCT

The City of Columbia (the City) maintains these standards of conduct covering conflict of interest and governing the performance of its employees engaged in the selection, award, and administration of contracts as required by 2 CFR Section 200.318. No employee, officer, or agent of the City of Columbia shall participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict could arise if the employee, officer or agent; any member of his/her immediate family; his/her partner; or an organization which employs or is about to employ any of the above, has a financial or other interest in the firm selected for award.

If the City of Columbia has a parent, affiliate or subsidiary organization (that is not a state, federally recognized tribe, or local government), the entity must also maintain written standards of conduct covering organization conflicts of interest. Organizational conflicts of interest occur when the entity is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization because of relationships with a parent company, affiliate or subsidiary organization.

To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft design plans and specifications, requirements, statements of work, and invitations for bids or requests for proposals must be excluded from competing for such procurements as required in 2 CFR Section 200.319 (a).

Under the 1991 Ethics Reform Act, South Carolina Code of Laws, 1976 as amended, City of Columbia employees are prohibited from accepting *anything of value* from any person such as contractors or firms, potential contractors or firms, or parties to sub-agreements. *Anything of value* includes, but is not limited to, lodging, transportation, entertainment, food, meals, beverages, money, gifts, honorariums, discounts and interest free loans.

Any alleged violations of these standards of conduct shall be referred to the City of Columbia Attorney. Where violations appear to have occurred, the offending employee, officer or agent shall be subject to disciplinary action, including but not limited to dismissal or transfer; where violations or infractions appear to be substantial in nature, the matter may be referred to the appropriate officials for criminal investigation and possible prosecution.

PROCUREMENT PROCEDURES

The director of each department or agency of the City of Columbia responsible for procurement of services, supplies, equipment, or construction obtained with Disaster Recovery CDBG funds shall review all proposed procurement actions to avoid the purchase of unnecessary or duplicative items. Such reviews shall consider consolidation or breaking out to obtain a more economical purchase. When determined appropriate by the Director, an analysis to determine which approach would be the most economical shall be undertaken.

The City of Columbia shall take affirmative steps to assure that small and minority firms, women's business enterprises, and surplus labor firms are solicited whenever they are potential qualified sources. The City of Columbia shall also consider the feasibility of dividing total requirements into smaller tasks or quantities so as to permit maximum participation by small and minority firms, women's business enterprises, and labor surplus firms. Where permitted by regulations, delivery schedules will be developed that will include participation by such businesses. The City of Columbia shall assist the prime contractor whenever possible by providing lists that identify qualified small and minority firms, women's business enterprises, and labor surplus area firms.

SELECTION PROCEDURES

All goods and services procured with CDBG Disaster Recovery funds shall be carried out in a manner that provides maximum free and open competition. Procurement procedures will not restrict or eliminate competition. The City of Columbia shall not place unreasonable requirements on firms in order for them to qualify to do business. Nor will the City of Columbia encourage or participate in noncompetitive practices among firms. The City of Columbia is alert to organizational conflicts that would jeopardize the negotiation process and limit competition. The City of Columbia will not require unnecessary experience or bonding.

Pursuant to state law and federal regulations at 2 CFR 200.319 (c), all solicitations of offers shall incorporate a clear accurate description of the technical requirements for the material, service, or product to be procured. In competitive procurements, these descriptions shall not contain features which unduly limit competition. The description may include a statement of the qualitative nature of the material, product, or service and the minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications shall be avoided whenever possible. A *brand name or equal* description may be used to define the performance or other salient requirements of procurement. The specific features of the named brand that must be met by offerors shall be clearly stated.

All solicitations of offers shall clearly set forth all requirements that offerors must fulfill and all other factors to be used in evaluating bids, proposals, or statements of qualifications.

Contracts shall be awarded only to responsible contractors/firms that possess the potential ability to perform successfully under the terms and conditions of the proposed procurement.

Consideration shall be given to such factors as the contractor's/firm's capacity, integrity, compliance with public policy, record of past performance, and financial and technical resources.

Grantees and subgrantees will ensure that all prequalified lists of persons, firms, or products used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, grantees will not preclude potential bidders from qualifying during the solicitation period.

METHODS OF PROCUREMENT

Direct procurement by the City of Columbia shall be made using one of the following methods depending on the type of service to be procured.

Small Purchase Procedures Relatively simple, informal procurement procedures will be used where the purchase of materials, single task services, supplies, equipment, and/or other property will not cost in the aggregate more than \$25,000 except where further limited by state law or Disaster Recovery CDBG policy. The procurement officer must obtain a minimum of three written price or rate quotations from qualified sources. Documentation on all quotations received shall be made a part of the file. Selections shall be made principally on price. Payment shall be made upon delivery or completion.

Competitive Sealed Bids/Formal Advertising Under this procedure, bids is publicly advertised in accordance with the state's Public Bid Law. A firm fixed price contract (either lump sum or unit price) shall be awarded to the responsible bidder whose bid is lowest in price and that conforms to all the material terms and conditions of the advertisement for bids.

Competitive sealed bids can be used ONLY when the following criteria are met: (1) there are complete, adequate, and realistic specifications or purchase descriptions; (2) there are two or more responsible bidders who are willing and able to compete effectively; (3) the procurement can be made on a firm fixed-price contract and selection of the successful bidder can appropriately be made principally on the basis of price. When formal advertising is used the following conditions shall be met:

- The advertisement for bids shall be publicly advertised in accord with state law.
- The advertisement for bids, including the specifications and pertinent attachments, shall clearly define the items or services needed in order for the bidders to properly respond to the advertisement.
- All bids shall be opened publicly at the time and place specified in the advertisement for bids.
- A firm fixed-price contract award shall be made by written notice to the lowest responsible bidder whose bid conforms to the advertisement for bids. Where specified in the bid documents, factors such as discounts, transportation costs, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts shall only be used to determine low bid when prior experience indicates that such discounts are generally taken.
- Notwithstanding the above, any or all bids may be rejected when there are sound documented business reasons in the best interest of the Disaster Recovery CDBG Program.

Competitive Negotiation: Requests for Proposals/Qualification Statements. The technique of competitive proposals is normally conducted with more than one source submitting an offer and either a fixed price or cost-reimbursement type contract is awarded. All competitive proposals shall be conducted using a formal RFP/RFQ when conditions are not appropriate for the use of sealed bids. Architectural and engineering services must be procured via requests for qualification statements; administrative consulting services must be procured via requests for proposals. Other professional services may also be procured by requests for proposals. The following procedures will be used for competitive negotiation:

- Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to requests for proposals must be considered to the maximum extent practical;
- Proposals must be solicited from an adequate number of qualified sources;
- The non-Federal entity must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;
- Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and
- The non-Federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.
- All submittals will be honored and entered into the competition.
- Request for proposals or qualification statements shall contain a detailed list of tasks in the proposed scope of work that is expected to be accomplished.
- The request for proposals or qualification statements shall identify all significant evaluation factors or selection criteria, including the corresponding point system that will be used to rate the proposals/qualification statements. Requests for proposals shall always include cost and at least one non-cost evaluation factor.
- The selecting official (or committee, if one is designated) shall review all proposals and statements received and make a technical evaluation of each. This shall also include a written statement that identifies the basis upon which the selection was made; including the importance of cost (for RFPs).

A contract award will be made to the responsible offeror whose submission is deemed most appropriate to the City of Columbia with consideration for price, qualifications, and other

factors set by the local governing body. Unsuccessful offerors shall be notified in writing within ten working days of contract award. Documentation of notification shall be maintained in the contract selection file for the individual project.

For qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, at least three firms will be solicited. Following the review of the qualification statements received, the most qualified competitor will be selected to enter into contract negotiation. This shall always include negotiation of price to insure cost reasonableness. At the conclusion of successful negotiation, the competitor shall be invited to enter into a contract.

Noncompetitive Negotiation/Sole Source Noncompetitive negotiation shall be used when small purchase, formal advertising, or competitive negotiation procedures are not feasible. Noncompetitive negotiation will involve solicitations of a proposal from only one source. This can also occur if solicitations under the competitive negotiation procedures result in only one proposal or qualification statement. Noncompetitive negotiation shall only be used when written authorization has been obtained from the U.S. Housing and Urban Development (HUD) In order to qualify for this type of procurement, one of the following circumstances must apply:

- The item or service is available only from a single source;
- It is determined that a public urgency or emergency exists and the urgency will not permit the delay beyond the time needed to employ one of the other three methods of procurement.
- After solicitation of a number of sources, competition is determined to be inadequate.

PROTESTED SOLICITATIONS AND AWARDS

Right to protest. Any actual or prospective bidder, offeror, contractor, or subcontractor who is aggrieved in connection with the solicitation or award of a contract may protest to the appropriate procurement officer. The protest, setting forth the grievance, shall be submitted in writing within five (5) days after such aggrieved persons know, or should have known of, the facts giving rise thereto, but in no circumstance after 10 days of notification of contract award.

Authority to resolve protests: The appropriate procurement officer shall have authority, prior to the commencement of an administrative review, as provided in this article, to settle and resolve a protest of an aggrieved bidder, offeror, contractor or subcontractor, actual or prospective, concerning the solicitation or award of a contract. This authority shall be utilized in a manner consistent with regulations or laws governing the procurement of supplies, services and construction for the city.

Decision. If the protest is not resolved by mutual agreement, the appropriate procurement officer shall promptly issue a decision in writing within 10 days. The decision shall state the reasons for the action taken.

Notice of decision. A copy of the decision shall be mailed or otherwise furnished immediately to the protestant and any other party intervening.

Finality of decision. A decision of this section shall be final and conclusive, unless fraudulent, or unless any person adversely affected by the decision requests a review in writing, setting forth the grievance, to the city manager within 10 days of the decision. The protestant may also request an interview with the city manager.

Request for review. The request for a review shall not stay the contract unless fraudulent.

CONTRACT PRICING

Cost plus percentage of cost and percentage of construction cost methods of contracting **MUST NOT** be used. The City of Columbia shall perform cost or pricing analysis in connection with every procurement action including contract modifications in accordance with the requirements of *Cost and Price Analysis for HUD Grantees and Funding Recipients*. Costs or prices based on estimated costs for Disaster Recovery CDBG projects shall be allowed only to the extent that the costs incurred or the cost estimates included in negotiated prices are consistent with federal cost principals [48 CFR Part 31]. Lump sum prices will only be utilized when there is a definable work product and the quantity to be provided is certain and the contractor assumes all the risk for costs incurred. Unit prices can be utilized when there is a definable work product and the contractor assumes all the risk for costs incurred, but the quantity is estimated. Cost reimbursement will be utilized when the task does not result in a definable work product or the contractor will not assume the risk of incurring the cost to complete the task. Cost reimbursement, unit or lump sum price, or a combination thereof may be utilized as appropriate.

A cost reimbursement type contract is most appropriate when the scope and extent of the work to be performed are not clearly defined, such as a professional services contract. A cost reimbursement contract **MUST** clearly establish a cost ceiling which may not be exceeded without formally amending the contract, and must identify a fixed dollar profit that may not be increased unless there is a contract amendment that increases the scope of the work.

A fixed price contract is appropriate when the scope of work is very well defined and product oriented. A fixed price contract can only be awarded when fair and reasonable prices can be established through adequate price competition and the solicitation is based principally on price.

A fixed price contract **MUST** establish a guaranteed price that may not increase unless there is a contract amendment that increases the scope of the work.

PROCUREMENT RECORDS

The City of Columbia shall maintain records sufficient to detail the history of all CDBG Disaster Recovery procurements. The Procurement Record shall include documentation of:

- The determination and rationale for selecting the method of Procurement from among the methods permissible under these guidelines;
- The process used to determine best value, the manner in which the evaluation process was conducted, and the evaluation criteria which, whenever possible, shall be quantifiable;
- The rationale for selecting the specific Contractor or Vendor and the basis upon which

cost was determined to be reasonable.

- For each amendment to an existing Contract, especially those containing material changes (e.g., changes in scope, performance period, price, price ceiling, etc.), a written justification shall be included in the Procurement Record.
- Determinations of emergency with respect to Emergency Selection Contracts shall be included in the Procurement Record, as well as the determination to enter into a Sole Source or Single Source Contract.

ECONOMIC OPPORTUNITIES FOR SECTION 3 RESIDENTS AND BUSINESSES

It is the policy of the City of Columbia to require its contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment.

Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u) requires the City of Columbia to ensure that employment and other economic and business opportunities generated by HUD financial assistance, to the greatest extent feasible, are directed to public housing residents and other low-income persons, particularly recipients of government housing assistance, and business concerns that provide economic opportunities to low- and very-low income persons.

Section 3 requirements are triggered whenever the need for new employment, contracting or subcontracting is established for federally funded projects involving the construction or rehabilitation of housing, or other public construction projects, valued at \$200,000 or more and contracts of \$100,000 or more. Section 3 regulations apply to construction and professional services contracts alike and cover the entire project regardless of whether it is fully or partially funded by HUD.

Procurement and Contracting Policy

The City of Columbia will incorporate Section 3 Contracting Policy and Procedures in all procurements generated for use with HUD funding. This policy establishes goals for awarding contracts to Section 3 Businesses and Small Disadvantaged Businesses, formerly Minority and Women Business Enterprises (M/WBE). It is the responsibility of contractors, vendors and suppliers to implement progressive efforts to attain Section 3 compliance. The numerical goal is:

Ten percent (10%) of the aggregate number of new hires in any fiscal year.

The Section 3 Contract Clause specifies the requirements for contractors hired for Section 3 covered projects. Any contractor that does not meet the Section 3 numerical goals must demonstrate why meeting the goals were not feasible. All contractors submitting bids or proposals to the City of Columbia are required to certify that they comply with the requirements of Section 3. The City's Office of Business Opportunity tracks Section 3 compliance.

Section 3 Clause

All Section 3 covered contracts shall include the following clause:

The work to be performed under this contract is subject to the requirements of Section 3 of the

Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD- assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

The parties to this contract agree to comply with HUD's regulations in 24 CFR Part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the Part 135 regulations.

The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR Part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR Part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR Part 135.

The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR Part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

Noncompliance with HUD's regulations in 24 CFR Part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

With respect to work performed in connection with Section 3 covered Indian housing assistance, section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract are subject to the provisions of Section 3 to the maximum extent feasible, but not in derogation of compliance with section 7(b).

SMALL AND MINORITY BUSINESSES, WOMEN'S BUSINESS ENTERPRISES, AND LABOR SURPLUS AREA FIRMS

The City of Columbia will take all necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include:

- Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to

permit maximum participation by small, minority, and women's business enterprises;

- Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
- Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

CONTRACT COST AND PRICE

The City of Columbia will perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold (\$150,000) including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the City will make independent estimates before receiving bids or proposals.

The City of Columbia must negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Costs or prices based on estimated costs for contracts under the federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the City of Columbia under Subpart E—Cost Principles of this part. The City of Columbia may reference its own cost principles that comply with the Federal cost principles. **The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.**

CONTRACT ADMINISTRATION

The City of Columbia shall maintain contract administration systems that ensure contractors/firms perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. The accepted performance of contractors/ firms will be a factor in subsequent contract negotiations and award. Remedial action by the City of Columbia through legal processes shall be considered in instances of significant nonperformance.

PURCHASING DIVISION - SEGREGATION OF DUTIES

Segregation of duties is a vital and critical measure for effective internal controls in citywide procurement and contracting operations and to ensure the integrity of the business process. These measures further reduce the risk of erroneous and inappropriate actions and deter fraud and fraudulent acts. Staff with multiple functional roles has a greater opportunity to abuse powers within an organization. The City of Columbia clearly separates the roles of purchasing and finance including a separation of receiving (custody) of assets and recording, payments,

monitoring and reviewer approval roles. Some specific examples of segregation of duties are as follows:

- The person who requisitions the purchase of goods or services is not the person who creates the purchase order or approves the purchase.
- The person who approves the purchase of goods or services is not the person who processes the invoices for payment.
- The person receiving an invoice is not the same individual creating the Purchase Order.
- The person who approves the purchase of goods or services is not able to obtain custody of checks to the recipient.
- The person who opens the mail is not the person handling fixed assets, invoicing, checks, etc.

Management is ultimately responsible for oversight, monitoring and review of the internal purchasing process. By performing periodic assessments and reviews of its procurement activities, the City will greatly reduce risks of fraud and abuse.

RESPONSIBLE CONTRACTORS

The City of Columbia will make awards only to responsible Contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. [2 CFR § 200.318(h)]. The City Community Development Department will assess vendor responsibility. Contractors and vendors must affirmatively demonstrate their responsibility and the responsibility of their proposed subcontractors.

PRE-QUALIFIED POOL (PQP) OF VENDORS

The City of Columbia may select contractors or vendors for any procurement activity from a qualified pool of potential contractors selected on the basis of an RFP or RFQ. Using a Pre-qualified Pool of Vendors allows aspects of the competitive process to be addressed early in a phased selection process so that vendors and contractors in the pool can be subsequently engaged on an accelerated, more efficient basis. Where a PQP has been established for a particular procurement, the solicitation of individual bids need not be publicly advertised. Contract award will be based on the lowest bid for specific services required. The City shall ensure that all panels include enough qualified sources to ensure maximum open and free competition. The City also will not preclude potential bidders from qualifying during the solicitation period. [2 CFR § 200.319(d)]

- State Agency or State Authority Contract. The City may enter into contracts with eligible vendors where the State has engaged in a competitive process to create a pool of eligible vendors for comparable services.
- Affiliated Agency Contract or Affiliated Agency Competitive Selection Process. Whenever an Affiliated Agency has completed a competitive process to create a pool of eligible vendors for the provision of goods and/or services, the City may enter into a contract with

those vendors for such services, if for the same services and upon comparable terms.

- Intergovernmental Agreements. To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the federal government, the City is encouraged to enter into State and local intergovernmental agreements or inter-entity agreements, where appropriate, for procurement or use of common or shared goods and services. [2 CFR § 200.318(e)]

NO IN-STATE OR LOCAL GEOGRAPHICAL PREFERENCES

The City of Columbia must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws.

BONDING REQUIREMENTS

City of Columbia construction or housing rehabilitation contracts or subcontracts exceeding the Simplified Acquisition Threshold of \$150,000 may accept the City's contractor bonding policy and requirements provided that the federal awarding agency or pass-through entity has determined that the federal interest is adequately protected. If such a determination has not been made, the minimum requirements must be as follows:

- A bid guarantee from each bidder equivalent to five percent of the bid price. The bid guarantee must consist of a firm commitment, such as a bid bond, certified check, or other negotiable instrument, accompanying a bid as assurance that the bidder will, upon acceptance of its bid, execute such contractual documents as required within the time specified. [2 CFR § 200.325 (a)]
- A performance bond on the part of the Contractor for 100 percent of the contract price. A performance bond is one executed in connection with a Contract to secure fulfillment of all the contractor's obligations under such contract. [2 CFR § 200.325 (b)]
- A payment bond on the part of the Contractor for 100 percent of the contract price. A payment bond is one executed in connection with a contract to assure payment, as required by law, of all persons supplying labor and material in the execution of the work provided for in the contract. [2 CFR § 200.325 (c)]

REQUIRED LANGUAGE IN CONTRACTS SUPPORTED BY FEDERAL FUNDS

All contracts supported by, or paid with, federal funds, and all terms required by any applicable federal statute, regulation, Federal Register notice, or policy shall be specifically incorporated by reference to such statute, regulation, Federal Register notice or policy. All CDBG-Disaster Recovery funded contracts must contain the applicable provisions described in Appendix II to Part 200 - Contract Provisions for Non-Federal Entity Contracts Under Federal Awards, which is annexed to these procedures.

APPENDIX II TO PART 200

CONTRACT PROVISIONS FOR NON-FEDERAL ENTITY CONTRACTS UNDER FEDERAL AWARDS

In addition to other provisions required by the Federal agency or non-Federal entity, all contracts made by the non-Federal entity under the Federal award must contain provisions covering the following, as applicable.

- A. Contracts for more than the simplified acquisition threshold currently set at \$150,000, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.
- B. All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.
- C. Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of *federally assisted construction contract* must include the equal opportunity clause in accordance with Executive Order 11246, *Equal Employment Opportunity*, as amended by Executive Order 11375 and implementing regulations at 41 CFR part 60, *Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor*.
- D. Davis-Bacon Act, as amended (40 U.S.C. 3141- 3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act as supplemented by Department of Labor regulations ([29 CFR Part 5, Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction](#)). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland Anti-Kickback Act (40 U.S.C. 3145). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.
- E. Contract Work Hours and Safety Standards Act (40 U.S.C. 3701- 3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40

U.S.C. 3702 and 3704. Less than 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

- F. Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of *funding agreement* under 37 CFR § 401.2 (a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that *funding agreement*, the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, *Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements*, and any implementing regulations issued by the awarding agency.
- G. Clean Air Act (42 U.S.C. 7401- 7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251- 1387), as amended - Contracts and subgrants in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act and the Federal Water Pollution Control Act as amended. Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).
- H. Debarment and Suspension (Executive Orders 12549 and 12689) - A contract award must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM). SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.
- I. Byrd Anti-Lobbying Amendment (31 U.S.C. 1352) - Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.