



We Are Columbia

City of Columbia, South Carolina

Community Development Block Grant – Disaster Recovery

Action Plan

September 20, 2016

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

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1.0 Introduction

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 over 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 over \$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 over 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 over 375,000 citizens who received boil water notices. The flooding and disruption of drinking water severely impacted the operations of the following:

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

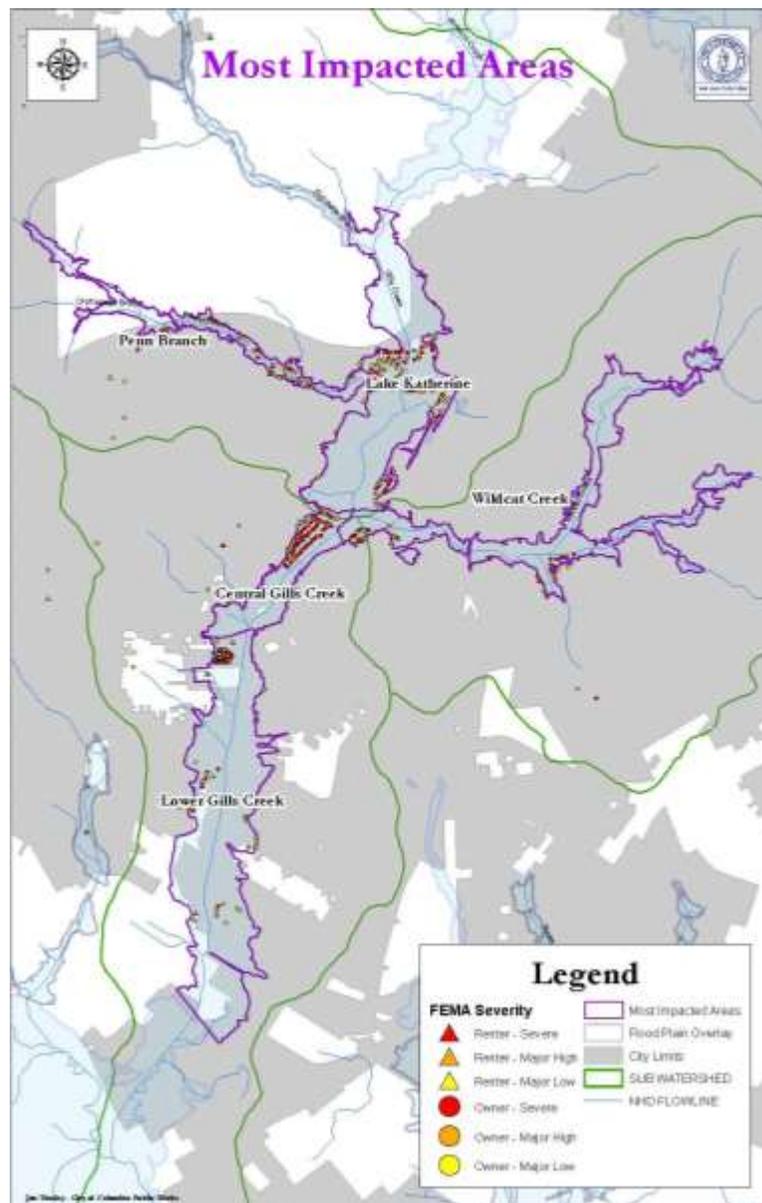
This widespread damage to homes, businesses, and critical infrastructure exacted a human toll and caused major disruptions to the lives of the citizens of impacted communities in Columbia and across South Carolina from which recovery still continues.

In Columbia, homes along and near the City's many creeks, lakes, and other waterways were inundated with water 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 assist the city to address some of the most dire unmet needs remaining as a result of the rain and flooding. 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 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.



2.0 Executive Summary

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 notified the State of South Carolina that it will receive an allocation of \$96,827,000 in disaster recovery funds to assist in recovery from the floods. Additionally, the City of Columbia was provided a separate allocation of \$19,989,000, to address unmet recovery needs. Supplemental to CDBG-DR funds, the city has also set aside \$1 million CDBG Program Income funds to assist with recovery activities for low to moderate income households.

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

As such, the City of Columbia Community Development Department will ensure that all CDBG-DR funds meet one of three national objectives: 1) benefit to low-to moderate income households, 2) elimination or prevention of slums and blight, and 3) urgent need. As required by HUD, the city submits this Action Plan to assess unmet needs in the areas of housing, infrastructure, and economic development. Additionally, the plan also outlines the city’s allocation strategy to effectively address outstanding recovery needs, proposed use of funds, eligibility criteria, and methods to address long-term recovery. The following chart depicts the city’s proposed allocation of CDBG-DR and CDBG Program Income funds designated to meet unmet recovery needs in the community.

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

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

3.0 Impact and Unmet Needs Assessment

3.1 Background

In accordance with HUD guidance, the City of Columbia completed the following unmet needs assessment to identify priorities for CDBG-DR funding provided as a result of extended rainfall and flooding caused as a result of Hurricane Joaquin. The assessment below utilizes federal and state resources including data provided by FEMA, HUD and SBA to estimate unmet needs in the three categories of damage: housing, economic development, and infrastructure.

3.2 Housing

In accordance with the guidance set forth in 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 1: FEMA Defined Owner Levels of Damage

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

Source: FEMA IA, July 2016

Based on this analysis, 2,717 owner-occupied households applied for IA assistance. These owners suffered an estimated \$9.768 million in Real Property FEMA Verified Loss (RP FVL) attributed to the October 2015 flood event. While the majority of the instances of damage were categorized “Minor-Low,” it is important to note almost 70 percent of total city’s RP FVL is concentrated amongst approximately 7 percent of the most affected households or those categorized under “Major-High” or “Severe” damage levels. The vast majority of these Major-High and Severely damaged households are located along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch in the floodplain. Based upon self-reported income data, only 26% of those homeowners categorized as “Major High” or “Severe” were low-to-moderate income. The highest percentage of low-to-moderate income homeowners received only “Minor-Low” damages with an average RP FVL of \$631. Damaged residences reported as “Minor-Low” and “Minor-High” are scattered throughout the city. The majority of these homes are located outside of the floodplain so it is anticipated that these damages are attributed to the rain event.

Table 2: 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

Notably, less than 50 percent (46.8%) of the affected owner-occupied population is classified low-and-moderate-income (LMI). Concurrently, the LMI population suffered 30.6% percent of recorded RP FVL citywide. 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% CDBG-DR allocation to the benefit of LMI residents and communities that were the most impacted by the October 2015 rain and flood event. To that end, it should be noted that 100.0% of all low-to-moderate income households will be provided an opportunity for assistance through the city's minor repair, rehabilitation, and elevation programs. Additionally, the city intends to prioritize and provide the full amount of assistance in order to serve all unmet needs of the affected LMI population to include the reallocation of \$1.0 million of city's CDBG entitlement funding. In order to achieve 70.0% LMI benefit of these programs, assistance to households above 80.0% Area Median Income (AMI) will also be capped as necessary.

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 over \$5.8 million. It is noted that this amount does not take into consideration the increased costs associated with structure 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. Based upon FEMA provided data, the unmet needs of this LMI population totals \$1,583,902.

As described above, most of the Major and Severe damages are concentrated in 5 major areas of the city:

- Lake Katherine
- Central Gills Creek
- Lower Gills Creek
- Wildcat Creek
- Penn Branch

Losses for both owners and renters, along with an unmet needs analysis for each specific area is included in sections 3.2.1 – 3.2.5.

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 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 3 and 4 illustrate the levels of rental damage occurring in the city, as broken down by FEMA's categorization system:

Table 3: FEMA Defined Levels of Damage

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

Source: FEMA IA, July 2016

Per the above categorization system, the city analyzed the affected rental population both 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 is for 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 along in the floodplain along Lower Gills Creek.

Table 4: Levels of Damage for Renter-Occupied Households

Damage Type	LMI* Owner Occupied			All Owner 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 as the city has a limited amount of affordable housing making it more difficult for renters to adapt to post-flooding conditions. As a result, the City of Columbia will encourage landlords with damaged rental units located in the floodplain to participate in the city's CDBG-DR and FEMA funded buyout program and has allocated 31.3% of CDBG-DR funding to rehabilitate damaged affordable rental properties outside of floodplain areas.

Table 5: Breakdown of Most Affected Owner-Occupied Households

Location	Quantity Damaged	Average RP FVL	Total RP FVL	LMI Households	LMI RP FVL
Lake Katherine	94	\$29,599	\$2,782,270	26.6%	28.8%
Central Gills Creek	57	\$37,859	\$2,157,940	19.3%	21.6%
Wildcat Creek	29	\$33,774	\$979,432	27.6%	26.1%
Lower Gills Creek	25	\$18,069	\$451,714	24.0%	17.8%
Penn Branch	23	\$26,675	\$613,525	30.4%	28.0%
Total	228	\$29,195	\$6,984,881	25.6%	24.5%

Source: FEMA IA, July 2016

Table 6: 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

3.2.1 Lake Katherine

Residents of Lake Katherine have the highest concentration of Major and Severe owner-occupied damages. Over 35.9% (93 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 over \$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 reflecting 28.8% of the damages. No renter occupied properties were reported by FEMA.

An unmet needs analysis of the Lake Katherine area, based upon the best available data from FEMA, shows that there are over \$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 unmet needs, 23 of these households are LMI households and have an unmet need of \$659,972. Of the 23 LMI households with unmet needs, all sustained Major or Severe damages.



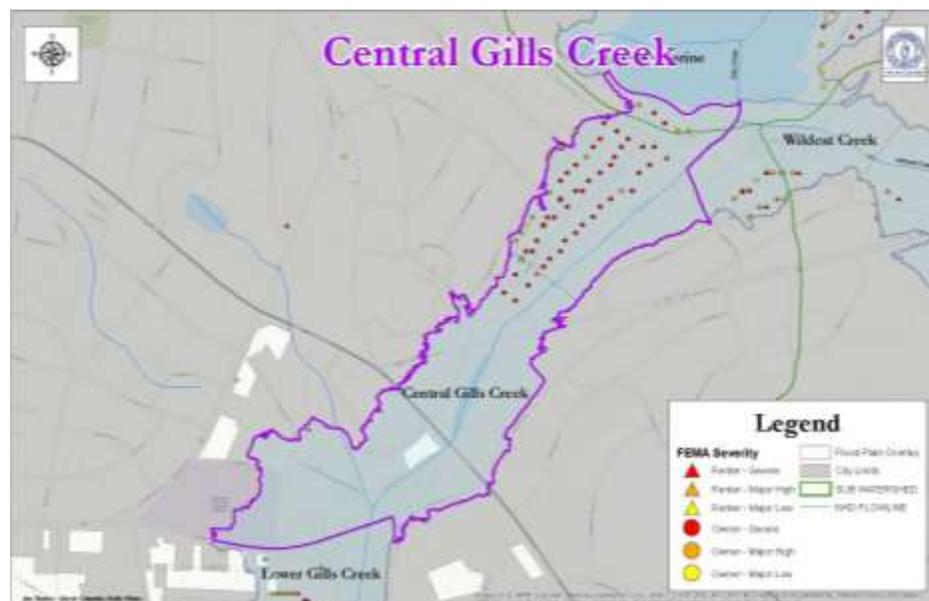
Due to the low concentration of LMI households, it is anticipated that most owners in this area may participate in the Homeowner Rehabilitation and Elevation Assistance Programs. In addition, these homeowners will be eligible to participate in proposed CDBG-DR and FEMA HMGP funded buyout programs.

3.2.2 Central Gills Creek

Central Gills Creek has the second highest concentration of Major and Severe owner-occupied damages. Over 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, 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.

An unmet needs analysis of the Central Gills Creek area, based upon the best available data from FEMA, shows that there are over \$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 of 7 LMI households that have an unmet need of \$294,784. All of these households 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 Homeowner Rehabilitation and Elevation Assistance Programs. In addition, homeowners 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.

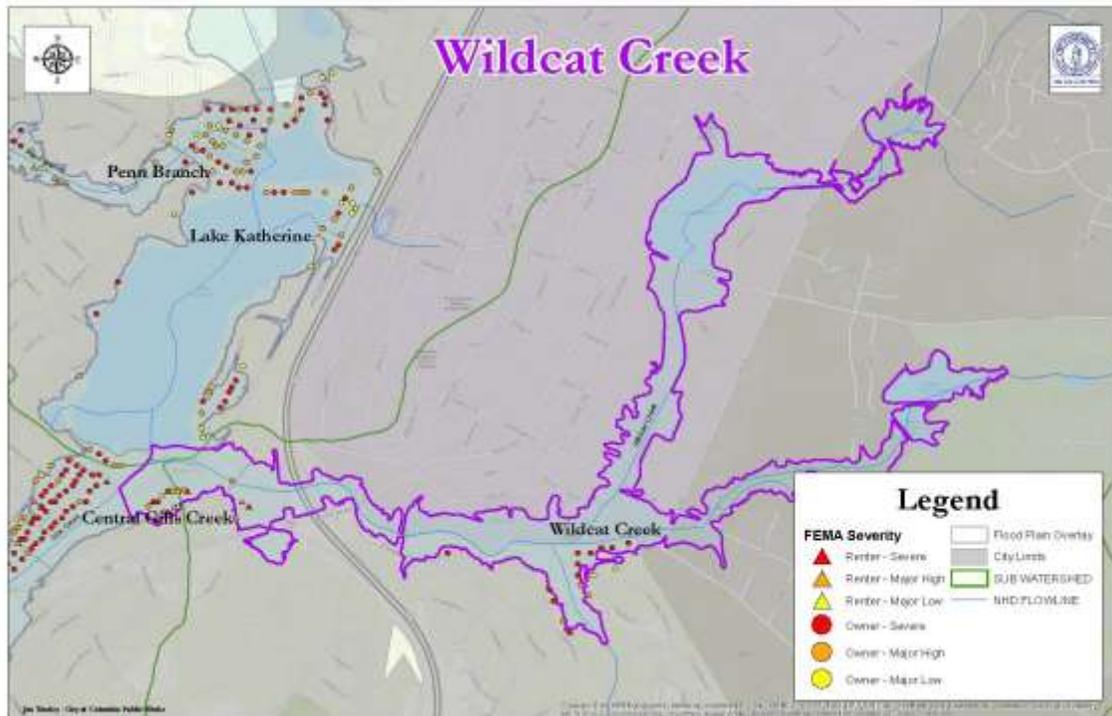


3.2.3 Wildcat Creek

Wildcat Creek has the third highest concentration of Major and Severe owner-occupied damages with 29 dwellings sustaining almost \$1 million in damages at an average rate of \$33,774 per household. Of the five areas with the most damage, Wildcat Creek homes sustained the second highest estimated loss per household. For the owner-occupied households in the Wildcat Creek area that sustained damages, 27.6% self-reported their income as low to moderate income and these LMI households sustained 26.1% of the area's damages. Additionally, 10 renter occupied households in the Wildcat Creek area were also affected by the flood event. Of these renter occupied households, 80.0% self-reported their income as low to moderate income and sustained 88.8% of all the personal property losses which was the highest at an average rate of \$7,739 per household.

An unmet needs analysis of the Wildcat Creek area, based upon the best available data from FEMA, shows that there are over \$456,932 worth of damages to 18 owner-occupied properties that have not been otherwise funded. All of these homes sustained Major or Severe damages. Of this number there are only four LMI households that sustained Severe damage with an unmet need of \$108,643.

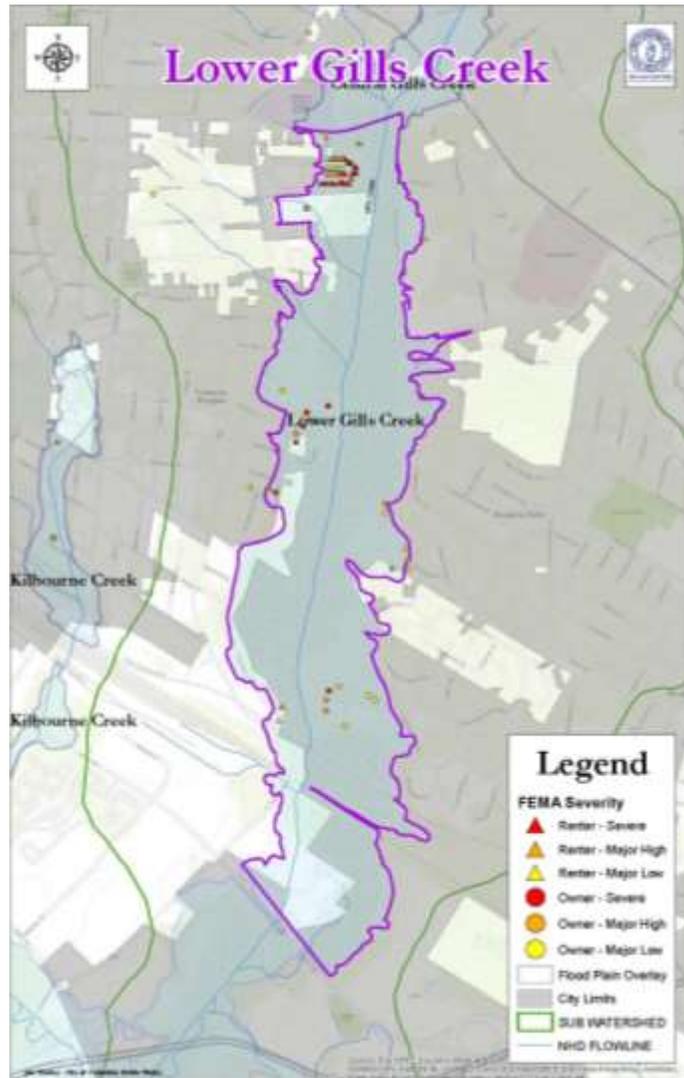
It is anticipated that most owners in this area may participate in the Homeowner Rehabilitation and Elevation Assistance Programs. In addition, homeowners in this area will be eligible to participate in the city's proposed CDBG-DR and FEMA buyout programs. It is also anticipated that LMI tenants will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



3.2.4 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 with 17.8% of the monetary damages attributed to LMI households. 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.

An unmet needs analysis of the Lower Gills Creek area, based upon the best available data from FEMA, shows that there are \$323,943 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 population there is only one LMI household that sustained Major-Low damage with an unmet need of \$8,019.



It is anticipated that most owners in this area may participate in the Homeowner Rehabilitation and Elevation Assistance Programs. In addition, these homeowners 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.

3.2.5 Penn Branch

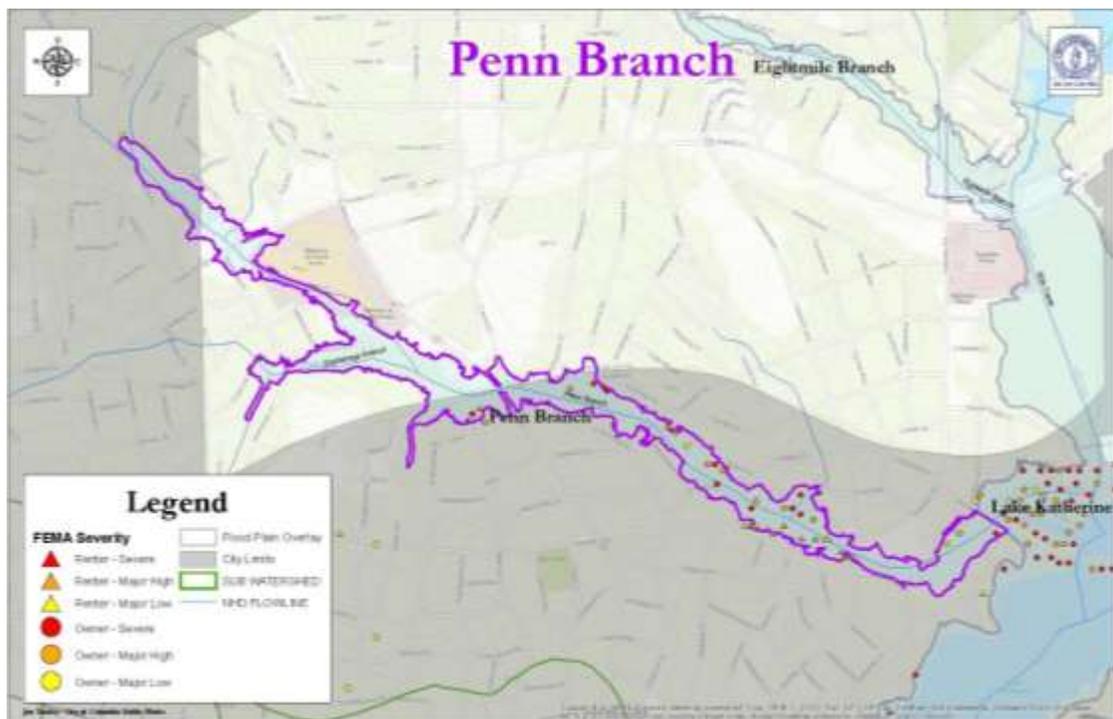
Residents of Penn Branch, a tributary to Lake Katherine, also experienced Major and Severe damages to owner-occupied properties at several locations. In this area there is an even mixture of owner-occupied and rental residential dwellings that experienced Major and Severe losses. A total of 23 owner-occupied dwellings sustained \$613,525 in

damages, and 7 owner occupants (30.4%) self-reported their income as low to moderate income. These 7 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.

An unmet needs 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 there are 4 LMI households that sustained damages with an unmet need of \$130,008.

It is anticipated that most owners in this area may participate in the Homeowner Rehabilitation and Elevation Assistance Programs. In addition, these homeowners 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.



3.2.6 Housing Unmet Needs

Flood impacts to the residents of the City of Columbia were widespread and cannot be underestimated. In order to calculate its assessment of unmet housing needs, the city compared the number and amounts of SBA awards to FEMA verified losses (RL FVL) in

order to determine unmet needs at all levels of damage. This information was used to inform the allocation strategy for the Action Plan.

As can be seen by Table 7, the amount of SBA loans is comparatively high to FEMA's verified loss amounts which can disproportionately affect households with lower damage estimates. This hypothesis is further supported through the RP FVL-SBA replacement value adjustment analysis conducted below, in which IA applicants with both a reported RP FVL and SBA award were compared to determine an unmet need multiplier.

Table 7: Owner-Occupied Households with RP FVL > \$0 and SBA Awards

Damage	Quantity Damaged	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. 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. For this reason, the City of Columbia has allocated almost 100% of CDBG-DR resources for this purpose. In addition, the allocation strategy is targeted to address the city's most vulnerable households while also meeting the needs of those that were most impacted by the flood.

Table 8: 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 & SBA, August 2016

3.3 Infrastructure

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 impacts of this breach upon city public facilities and services to the state's capitol. In order to assess unmet infrastructure needs for CDBG-DR funding, the city developed damage assessments in order to participate in FEMA's Public Assistance (PA) program. The following table illustrates how those damages are documented and categorized.

Table 9: FEMA PA Categories

Category	Definition
A	<i>Debris Removal</i>
B	<i>Emergency Protective Measures</i>
C	<i>Road Systems and Bridges</i>
D	<i>Water Control Facilities</i>
E	<i>Public Buildings and Contents</i>
F	<i>Public Utilities</i>
G	<i>Parks, Recreational and Other Items</i>

Based on these categories, the city identified its highest level of need in Category D *Water Control Facilities* due to the breach of the Columbia Canal. This breach resulted in a 60-foot section of the canal washing away which caused the water level of the canal to drop below the level necessary for the city to pump water into its water treatment facility through normal operations. As of July 2016, the long term mitigation cost to restore the canal to its pre-flood condition for this program is estimated to be between \$40 and \$50 million. Additional mitigation efforts to reinforce the levee and construct a permanent bypass pumping system to pull water from the nearby rivers are estimated to be an additional \$50.0 million dollars. These estimates do not include the almost \$10 million in emergency repairs listed in Category B.

The second 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 over \$11.1 million.

The third utmost infrastructure need, Category E *Public Buildings and Contents*, is an estimated \$2.7 million in repairs of city buildings, the hydroelectric plant and the wastewater system. This amount is expected to assist with \$2.5 million in repairs for several buildings that had water damage with the largest building loss being the fire station that was completely submerged by water. An additional \$0.2 million is also needed to repair or replace fire and police equipment that was lost or damaged in the flood waters.

Category F *Public Facilities* reflects \$2.0 million in repairs to the city's wastewater system to address damages to sewer lift stations and sewer lines. Additionally, \$1.5 million was included

to repair the city's hydroelectric plant but this was not identified as a priority as no water can reach the station until the Columbia Canal breaches are repaired.

In addition to the categories listed above, 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.

As shown in Table 10 below, it is estimated that the total amount of infrastructure repairs for the City of Columbia exceeds \$75.2 million. Of this amount, the city is responsible to provide a 25% cost share which totals to almost \$18.9 million. Although it is not anticipated that FEMA funding will be available to fully fund all of the city's projects, it is important to note that the 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).

Once 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 issue payments for the approved non-Federal share of the eligible project amount. For large projects (\$121,800 and above), SCEMD will issue payments for the non-Federal share of 25% of approved eligible project expenditures. As of July 2016, there is \$72 million allocated from the state to cover the local match. As such, this allocated amount is anticipated to cover 100% of the city's required match, and the city should not have an unmet infrastructure need related to FEMA's match requirements.

Table 10: Breakdown of FEMA PA Funding by Category

Category	Total	25% Cost Share
A	\$605,575	\$151,394
B	\$11,168,178	\$2,792,045
C	\$1,500,000	\$375,000
D	\$50,000,000	\$12,500,000
E	\$9,669,525	\$2,417,381
F	\$2,000,000	\$500,00
G	\$300,200	\$75,050
Total	\$75,243,478	\$18,810,870

Source: City of Columbia, July 2016

Although the 25% cost share for FEMA PA projects will be paid by state funds, the City of Columbia fully recognizes that there are unmet needs beyond the cost share requirement that will not be covered due to the state's limited appropriation of FEMA PA funding. Unfortunately, the amount and types of projects to be funded by the state's FEMA allocation is not known as of September 2016. In the event that CDBG-DR funds are necessary to complete these type of activities, the city will submit a substantial Action Plan Amendment for HUD's review and approval.

3.4 Economic Development

3.4.1 Damage Assessment

The extensive rainfall and flooding of early October 2015 caused severe impacts to 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 down 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, and 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. Over 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, over 58.6% of respondents stated they did not have sufficient insurance to cover their losses.

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

Table 11: 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

NAICS Industry	Quantity Approved	Approved Amount*	Total Estimated Damage
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

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

3.4.2 Unmet Economic Development Needs

To address the unmet needs of businesses impacted by the October 2015 flood, the City of Columbia will provide low interest loans to qualified businesses. By capitalizing the Economic Development Administration (EDA) disaster loan fund with \$200,000 in CDBG-

DR funds, the OBO will be able to lend up to \$1 million to impacted business owners. Since EDA rules allow for a 4 to 1 capitalization match from the federal government to the local investment into the fund, OBO will be able to make loans up to \$100,000 per impacted business.

In order to be eligible for a loan, a business must be located within the corporate limits of the City of Columbia and must demonstrate unmet needs from the storm of greater than \$10,000. Funds from the loan can be used for real estate acquisition or upfit, inventory, equipment, and working capital.

3.5 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 vouchers, and Section 8. In conjunction with the city's unmet needs assessment, CHA was requested to assess storm related damages and unmet needs remaining at CHA's administrative buildings, public housing developments, and any development at which CHA has allocated project based vouchers and information related to privately owned units housing participants in the Section 8 Housing Choice Voucher Program.

Subsequent to its assessment, 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 as a result of the flood event. 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 of the project based housing developments were under construction at the time of the October 2015 flood event and were not damaged.

However, 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 over 100 privately owned units damaged with many of the tenants being 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.

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. Damaged Section 8 units will be prioritized during the implementation of CDBG-DR housing programs and repaired as necessary.

3.6 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, or 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. In addition, the United Way reports that there were a total of 311 individuals in the Midlands who 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 the flood event 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 8 shelters to serve displaced households in and around the city. These shelters started opening on October 4, 2015 and served approximately 382 persons for a period of 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 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 who provide volunteer, financial, spiritual, physical, and/or psychological support for persons whose lives have been impacted by the disaster.
- Facilitating coordinated 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 to 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 over 750 residents located in Richland County, 17 rebuilding projects have been completed and 5 are currently underway in the City of Columbia. In conjunction with these efforts, the city of Columbia has committed a significant portion of its CDBG-DR funding (31.3%) for the repair and reconstruction of affordable rental housing in order to ensure that sufficient resources are available for the city's most vulnerable populations and will seek to ensure that rehabilitated rental housing is located desirable areas with mixed incomes and housing types where possible. The city's Small Rental Repair Program (SRRP) is programmed to ensure that restored rental units are only available for re-occupancy of LMI households at or below Fair Market Rates for a period of 3 years.

4.0 CDBG-DR Programs

4.1 Program Descriptions

Columbia Homeowner Assistance Program (HAP)

Program Eligible Activity: 24 CFR 570.202, 24 CFR 570.201 (d), 24 CFR 570.605

National Objective: Low- and Moderate-Income Benefit

Activity Allocation: \$3,336,150

Overview and Delivery

The proposed City of Columbia Housing Assistance Program (HAP) will be administered by the city's Community Development Department. The program will provide funding to assist owner-occupied households with Major-High and Severe damages. The overall goal of this program is to repair damages directly related to the October 2015 rain and flood event for owner occupied properties with unmet needs that exceed \$25,000. In addition, the program will provide assistance to meet elevation requirements where required. Due to budget limitations and 70% LMI requirement, only LMI households will provided assistance.

In order to leverage limited CDBG-DR funding, homeowners eligible for participation in FEMA's Increased Cost of Compliance (ICC) program, must apply for and receive this funding if elevation of the rehabilitated structure is necessary. Assistance for reconstruction of substantially damaged owner-occupied dwellings will also be provided. In all cases, sufficient federal and non-federal resources must be available to complete rehabilitation and reconstruction projects to HUD and city building code requirements. Funding for this program will be capped at \$150,000 unless rehabilitation of the flood damaged structure requires additional work to specifically address compliance with city building code and floodplain ordinance requirements. Consideration will also be given for additional work related to environmental remediation and/or Green Building requirements when necessary. In addition, funding for the costs of initial homeowner hazard insurance premiums, as well as flood insurance premiums (for properties covered by the Flood Disaster Protection Act of 1973 as amended, pursuant to §570.605) will be covered for a period of one year.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

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

Ineligible Applicants

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.

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

Prioritization of Applicants

In order to meet the 70% LMI requirements, only LMI households will be eligible for participation in the city's Housing Assistance Program (HAP). In addition, applications for assistance by LMI elderly and disabled applicants will also be given first priority.

Use of Funds

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

Monitoring

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

Columbia Buyout Program (CBP)

Program Eligible Activity: 24 CFR 570.207, 24 CFR 570.504

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

Activity Allocation: \$2,000,000

Overview and Delivery

The proposed City of Columbia Buyout Program (CBP) will be administered by the city's Community Development Department. The purpose of this voluntary program is to reduce the risk from future flooding by purchasing contiguous residential properties that sustained Major-High or Severe damages located in the floodway or floodplain. Due to the limited amount of funding, the purchase price will be based upon post-disaster Fair Market Value (FMV). Owner-occupants and owners of rental properties will be prioritized as applications are completed and determined to be eligible for funding. All residential properties acquired will be demolished and dedicated in perpetuity to a use that is compatible with open space, recreational uses, natural floodplain functions, ecosystem restoration, or wetlands management practices. Program funds will also be used for property disposition costs, as necessary.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Damaged owner occupied or rental dwelling must be located within Columbia City Limits in a designated floodway or floodplain.
- Applicants must have owned the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained Major-High or Severe damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium.

Ineligible Applicants

Ineligibility criteria for this program is as follows:

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

Prioritization of Applicants

Owner-occupants and owners of rental properties will be prioritized as applications are completed and determined to be eligible for funding. In addition, the voluntary purchase of continuous properties may also be considered in order to reduce risk of future flooding in designated areas with a high concentration of owner participation in the program.

Use of Funds

CDBG-DR funds will be provided in the form of direct assistance to owners who voluntarily participate in the program. Owners will be paid post-disaster Fair Market Value of the damaged residential dwelling as determined by a primary and review appraiser. Relocation assistance will be provided to any tenants permanently displaced by the buyout.

Monitoring

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

Columbia Small Rental Repair Program (SRRP)

Program Eligible Activity: 24 CFR 570.202, 24 CFR 507.201

National Objective: Low- and Moderate-Income Benefit

Activity Allocation: \$6,565,270

Overview and Delivery

The proposed City of Columbia Small Rental Repair Program (SRRP) will be administered by the city's Community Development Department. The program will provide funding to assist with the

repair of storm damaged and non-storm damaged rental properties located outside of the floodplain. The primary goals of SRRP are to assist property owners in repairing and reconstructing storm damaged rental properties while also providing displaced rental households with affordable housing opportunities within the city of Columbia. Once eligible storm damaged rental properties are repaired, the city may consider the repair of non-damaged rental properties as necessitated by the needs of rental households who have been displaced by the October flood event and as CDBG-DR funding is available. Funding for this program will be capped at \$150,000 per unit unless rehabilitation of the flood damaged structure requires additional work to specifically address compliance with city building code and floodplain ordinance requirements. Consideration will also be given for additional work related to environmental remediation and/or Green Building requirements when necessary.

As a requirement to receive CDBG-DR assistance, rental property owners must agree to make rehabilitated rental properties available to existing or displaced LMI households first prior to assisting other LMI rental households. In addition, rental property owners will be required to sign a grant agreement requiring that all rehabilitated units remain affordable for a period of three (3) years. For the purpose of the SRRP, small rental properties are those with one to four rental units, which include single family, duplex, triplex, and quadplex rental buildings on one tax parcel. The rent for an affordable rental unit will be calculated based on the income level of the tenant and the size of the rental unit which should be between 50-80% of the local Fair Market Rate. Rental complexes with 4 units designated as a “substantially rehabilitated building” will be provided with broadband infrastructure. In addition to rehabilitation assistance, the city intends to provide temporary relocation assistance to tenants who are temporarily displaced by rehabilitation activities.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

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

Ineligible Applicants

Ineligibility criteria for this program is as follows:

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

Prioritization of Applicants

Damaged rental properties occupied at the time of the storm located outside of the floodplain will be given first priority. Existing rental properties not damaged by the storm will be prioritized based upon the level of need of displaced LMI tenants and as funding remains available.

Use of Funds

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

Monitoring

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

City of Columbia Elevation Reimbursement Program (ERP)

Eligible Activity: 24 CFR 570.202, 24 CFR 507.201

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

Activity Allocation: \$3,490,000

Overview and Delivery

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

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained "Severe" damages.
- Damaged residence must be a single-unit structure.
- If applicable, applicants must have applied for FEMA Increased Cost of Compliance (ICC) funding for elevation of their damaged structure.

- Elevation projects started after the one year anniversary of the flood must receive Tier II environmental clearance prior to initiating elevation work.
- Elevation of the home is required by the city's floodplain ordinance and must be at least 50% complete prior to the issuance of reimbursement.

Ineligible Applicants

Ineligibility criteria for this program is as follows:

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

Prioritization of Applicants

All complete applications for assistance will be processed in the order that they are received and as funding remains available.

Use of Funds

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

Monitoring

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

City of Columbia Minor Repair Program (MRP)

Eligible Activity: 24 CFR 570.202, 24 CFR 507.201

National Objective: Low- and Moderate-Income Benefit

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

Overview and Delivery

The proposed City of Columbia Minor Repair Program (MRP) will be administered by the city's Community Development Department. The program will make funding available to assist approximately 700 low-to-moderate income owner-occupied households that sustained Minor-

Low and Minor-High damages who have remaining repair needs not covered by the FEMA IA Program and SBA. Funding up to \$25,000 will address rain/flood damages as well as lead based paint, asbestos, and other repairs necessary to bring LMI dwellings up to the Columbia Property Maintenance Code and ensure that these housing units are more resilient to future natural hazards. Elderly and disabled applicants will be given first priority for assistance.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained Minor-High and Minor-Low damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium with less than \$25,000 in damages.
- Applicants must be below 80% AMI at application intake.

Ineligible Applicants

Ineligibility criteria for this program is as follows:

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

Prioritization of Applicants

Elderly and disabled LMI households will be given first priority for participation in MRP. Remaining applications for assistance by LMI households will be processed in the order that they are completed and determined to be eligible.

Use of Funds

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

Monitoring

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

City of Columbia Economic Development Administration (EDA) Disaster Loan Fund Capitalization

Eligible Activity: 24 CFR 570.203

National Objective: Urgent Need, Elimination of Slums and Blight

Activity Allocation: \$200,000

Overview and Delivery

To address the unmet needs of small businesses impacted by the October 2015 storms, the City of Columbia will provide low interest loans to qualified businesses. By capitalizing the EDA disaster loan fund with \$200,000 in CDBG-DR funds, the City of Columbia's Office of Business Opportunity (OBO) will be able to lend up to \$1 million to impacted businesses. Since EDA rules allow for a 4-to-1 capitalization match from the federal government to the local investment into the fund, OBO will make loans up to \$100,000 per impacted business.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Business must be located within Columbia City Limits and qualify as a "small business" with less than 50 employees as defined by the city.
- Business owners must have owned and operated the business as of and prior to the date of the storm event (October 2015).
- Businesses must have secured funding through another bank allowing CDBG-DR funds to serve as a gap loan to cover unfunded project costs. The CDBG-DR loan and bank loan must close within 45 days of each other.
- Business must meet the city's standard underwriting criteria for commercial revolving loans.

Ineligible Applicants

Ineligibility criteria for this program is as follows:

- Businesses located outside of Columbia city limits.
- Businesses that cannot demonstrate an unmet need of \$10,000 or more directly attributable to the October 2015 rain/flood disaster.
- Businesses without bank participation or financing.

Prioritization of Applicants

Applicants will be considered on a first come, first serve basis determined by the date in which the city receives a completed loan application.

Use of Funds

Funds will be provided to eligible small businesses in the form of a low interest loan for terms of up to 25 years depending upon the use of funds. The interest rate for the CDBG-DR loan will be 1% below the prime rate with a minimum of 4.00%. Funds from the loan can be used for real

estate acquisition or upfit, inventory, equipment, and working capital. Real estate acquisition is limited to 1) purchasing property impacted by the flood to open a new business, and 2) acquisitions of new property by a flood impacted business in which the current location is not usable or the cost to repair is not feasible. Real estate development deals and speculative real estate ventures are ineligible. The city's current Commercial Revolving Loan Fund (CRLF) code for EDA loans will govern these loans, including the size of eligible small businesses, underwriting standards, and approval by the CRLF committee. The only exception to the CRLF code is the committee's ability to provide funding to small businesses in the most impacted areas of the city that cannot meet the minimum credit score of 600.

Monitoring

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

4.2 Planning and Coordination

The City of Columbia has created a multi-departmental work group that is providing oversight of the city's flood recovery process. The city's Community Development Department, which is responsible for the management and monitoring of all CDBG-DR programs, actively participates in the work group to ensure internal coordination with other city departments and agencies directly involved in the administration of CDBG-DR programs.

In addition, the City of Columbia is actively coordinating the city's flood recovery efforts with the South Carolina Disaster Recovery Office, Richland County, and Lexington County in order to ensure consistency in recovery data, duplication of benefit calculations, the environmental review process, and program design. These coordinated efforts will be continued during the CDBG-DR recovery process to promote consistency and effectively manage the expectations of program applicants and minimize confusion regarding available CDBG-DR disaster recovery services and benefits.

4.3 Leveraging Funds

4.3.1 Overview

In order to maximize the impact of the CDBG-DR funding provided to the city, 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 utilize existing relationships and strive to create new partnerships with other federal and state agencies, corporations, foundations, nonprofits and other stakeholders as a means of utilizing all viable sources of funding.

CDBG-DR funds will be used to address critical unmet needs that remain following the infusion of funding from other federal sources, including FEMA and the SBA. Existing city resources and other funds from the disaster appropriation will also be examined in an effort to ensure that all available funding is utilized where it is most needed. In addition, the City of Columbia will utilize some of its existing CDBG staff, entitlement program infrastructure and funding to effectively manage CDBG-DR programs as outlined below.

4.3.2 Housing

In an effort to have the greatest impact possible, the city will rely on best practices and experience learned from prior disasters. Additionally, it will be critical to implement a creative approach to utilizing the available funding. 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. Concurrently, the city will take a comprehensive approach when examining how best to assist households with unmet needs. This inclusive strategy will examine the types of funding sources that are available and how those sources can be combined to create a holistic solution to the issues facing residents and communities.

In order to maximize funding to assist low-to-moderate income households the city has committed \$1 million in CDBG program income funding toward the CDBG-DR Minor Repair Program in order to ensure adequate assistance is available to approximately 700 households with unmet recovery needs. In addition, the city has submitted an application to FEMA to ensure sufficient funding for buyout activities.

4.3.3 Economic Development

To address the unmet needs of businesses impacted by the October 2015 flood event, the City of Columbia will provide \$200,000 of CDBG-DR funding toward low interest loans to qualified businesses by capitalizing the Economic Development Administration (EDA) Disaster Loan Fund. Leveraging these funds enables the City of Columbia's Office of Business Opportunity (OBO) to lend up to \$1M to impacted businesses. As such, OBO will be able to provide loans up to \$100,000 per impacted business.

4.3.4 Infrastructure

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

4.4 Protection of People and Property; Construction Methods

4.4.1 Construction Standards

The City of Columbia intends to promote high quality, durable and energy efficient construction methods in all CDBG-DR programs. All newly constructed buildings must meet all city building codes, standards and ordinances. Future property damage will be minimized by requiring that any rebuilding be constructed according to the best available science with respect to base flood elevations.

All new construction of residential buildings or replacement and/or reconstruction of substantially damaged buildings will incorporate Green Building Standards, and rehabilitation of non-substantially damaged residential buildings will follow guidelines in the HUD CPD Green Building Retrofit Checklist. Any construction subject to the Green

Building Standards will meet an industry-recognized standard and achieve certification under at least one of the following programs:

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

At this time, the city is considering the procurement of a third party inspection service in order to ensure that Green Building Standards are met using standardized checklists developed from the above listed programs. In addition, the city will provide training on Green Building standards and standardized checklists to all city staff administering CDBG-DR construction programs, subrecipients, inspectors, and contractors. Compliance with Green Building Requirements will be memorialized in contracts and grant agreements, as applicable. The city, or the city's designee, will monitor each construction program to ensure compliance with these standards.

4.4.2 Quality of Construction, Bonding, and Warranties

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

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

4.4.3 Dam and Levee Work

At this time, the city's CDBG-DR funding is not allocated to dam or levee work. If funding is allocated to this activity in the future, the city will submit a substantial Action Plan Amendment to HUD and meet the following requirements:

- Registration with the USACE Levee Base or Dam Inventory.
- Document that the structure is admitted under the USACE P.L. 84-99.
- Document that the structure is accredited under the FEMA National Flood Insurance Program.

- Upload project information regarding the location and area served into the DRGR system.
- Establish and maintain documentation related to the project's risk assessment and risk reduction measures.

4.4.4 Elevation Standards

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

4.4.5 Public Housing, HUD-Assisted Housing and Housing for the Homeless

Details on the city's plans to identify and address the needs of Public Housing, HUD assisted housing, and Housing for the Homeless can be found in the Action Plan Unmet Needs Assessment. In summary, the city has evaluated the needs of the Columbia Housing Authority which have been fully met through private insurance coverage. In addition, the Richland-Lexington Counties Long Term Recovery Group (RL-LTRG), in conjunction with the United Way of the Midlands, have demonstrated sufficient resources to address the city's most vulnerable populations residing in Permanent Supportive Housing, Transitional Housing, and Emergency Shelters.

4.4.6 Broadband Infrastructure

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

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

4.4.7 Disaster-Resistant Housing

The residents of the City of Columbia, through the United Way and RL-LTRG, have existing programs that provide homeless prevention and rapid re-housing assistance to individuals, families at risk of homelessness, and individuals and families experiencing homelessness. The city will continue to work with the United Way and RL-LTRG to provide these services, focusing additional resources as appropriate to solve storm-related issues. Additionally, the city will work with the local Continuum of Care organizations to identify existing transitional and permanent housing programs that can be used to assist impacted individuals and families. The city will also support the expansion of existing programs where necessary to provide stable, permanent housing and supportive services to affected residents while providing disaster resilient housing to all households.

In addition, the city will work with its partners at the local level to determine the current availability of affordable housing and, as appropriate, capitalize on opportunities to increase the affordable housing stock. In the wake of the October 2015 flood event, the city continues to recognize there is a need for affordable housing both immediately following a disaster and throughout the recovery continuum. In response, the city is committed to working with its partners to ensure that the rehabilitation and development of affordable housing is a major component of the long-term recovery strategies.

4.4.8 Minimize or Address Displacement (URA)

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

4.4.9 Program Income

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

4.4.10 Monitoring Standards and Procedures

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

4.4.10.1 Sub-recipient Monitoring Plan

The City of Columbia Community Development Department will use its existing risk based monitoring strategy to monitor the program activities and performance of sub-recipients. This monitoring strategy includes a process to conduct a risk analysis in order to determine the level of monitoring that will be conducted. High risk sub-recipients, project sponsors, and CHDOs are monitored onsite in the same fiscal year in which the risk analysis is conducted. In addition to onsite visits, the city undertakes annual remote or desktop monitoring for all sub-recipients, project sponsors and CHDOs. Remote or desktop monitoring is conducted by evaluating various in-house materials such as: applications for funding, written agreements, reimbursement requests, progress reports, drawdown reports, previous monitoring determinations and audits. This monitoring process allows the City to better track program progress and provide technical assistance as needed.

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

Table 12: 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.

4.4.10.2 Applicant Monitoring

In order to minimize the misappropriation of or misuse of CDBG-DR funds and reduce the likelihood of applicant fraud, the city will require individual applicants to

sign certifications at the application and grant agreement phases of the program. Certifications will require that individual applicants acknowledge and certify that:

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

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

4.4.10.3 Internal Auditor

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

4.4.10.4 Anti-Fraud Waste and Abuse

In order to minimize fraud, waste, and abuse in all CDBG-DR programs, the city's internal auditor will develop procedures related to the identification of fraud and establish a process to disclose alleged fraudulent activities. In addition, the city's

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

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

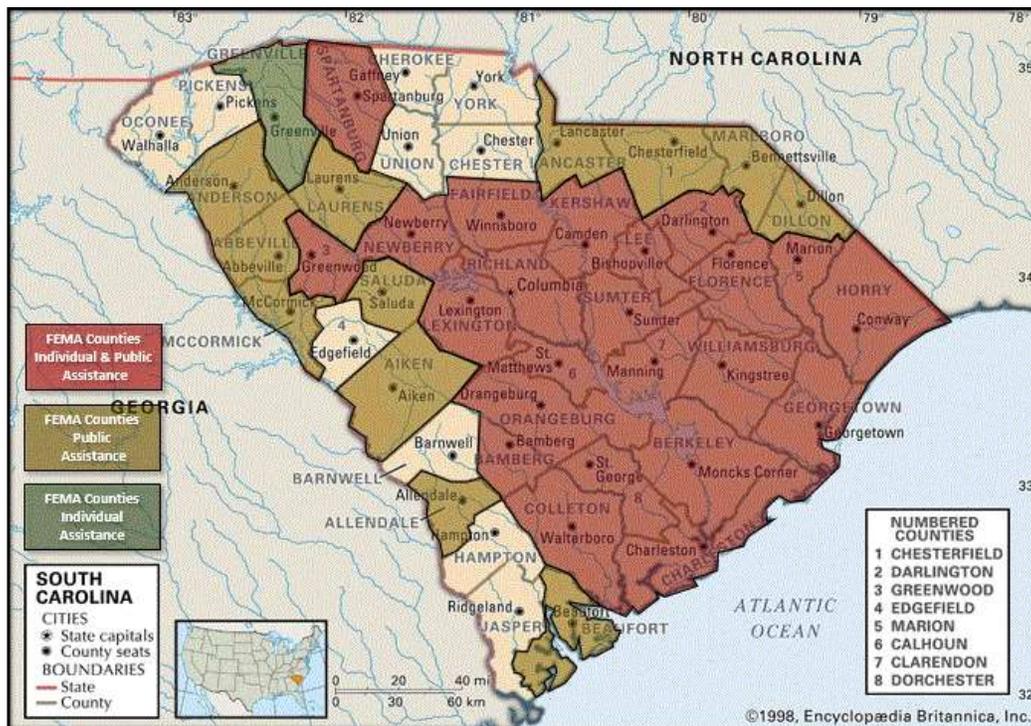
It is important to note that Conflict of Interest statements are included in the City of Columbia Personnel Policies and all sub-recipient grant agreements. These statements mandate that no person who exercises or has exercised any functions or responsibilities with CDBG-DR activities shall obtain a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

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

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

5.0 Location, Mitigation Measures, Use of Urgent Need

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



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

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

6.0 Clarity of Plan and Citizen Participation

6.1 Citizen Participation Plan

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

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

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

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

- Phone: 803-545-4625
- Email: gljohnson@columbiasc.net
- 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

6.2 Citizen Grievances or Complaints

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

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

6.3 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 asked 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 19th date with a deadline for public comments ending on September 6, 2016. In addition, a public notice regarding the availability of the plan for review was published in *The State* newspaper, the publication with the widest circulation in the City of Columbia, on August 16, 2016. All public comments received on the plan have been incorporated into the final Action Plan submitted to HUD for review and approval.

6.4 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:

6.4.1 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.

6.4.2 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.

6.4.3 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.

6.5 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.

6.6 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.

6.7 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.

7.0 Conclusion

7.1 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.

7.2 Pre-Award, Pre-Agreement, and Reimbursement

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.

7.3 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.

7.4 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.

7.5 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.

7.6 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.

8.0 Appendix

8.1 Exhibit A – Certification of Controls, Processes, and Procedures



City of Columbia CDBG-DR Certifications

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

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

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

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

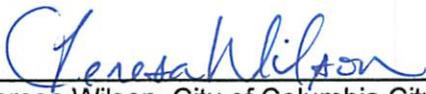
4. The City of Columbia will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining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

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

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

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

- m. The City of Columbia certifies that it will comply with all applicable laws.



Teresa Wilson, City of Columbia City Manager

9-16-2016
Date

8.2 Exhibit B – Public Comments



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

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

July 28, 2016 Outreach Event

The city held a public outreach event on July 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 over 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 9:

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 10:

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 11:

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 12:

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

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

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

Comment 13:

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 14:

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 15:

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

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

Comment 16:

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 17:

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 18:

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 19:

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 20:

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 21:

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 22:

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 23:

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 24:

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 25:

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 26:

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 27:

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 28:

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 29:

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 30:

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 31:

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 32:

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 33:

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 34:

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.

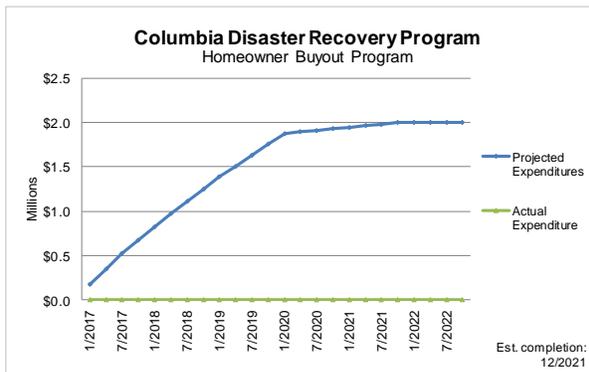
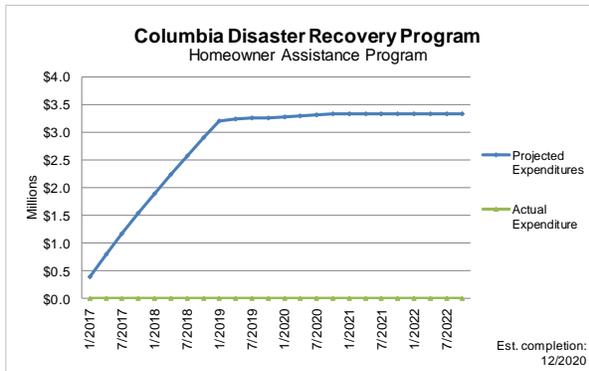
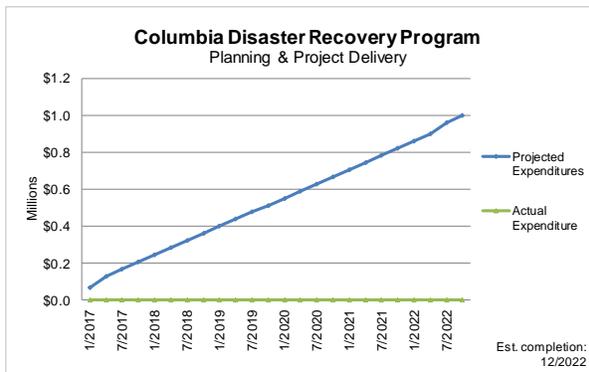
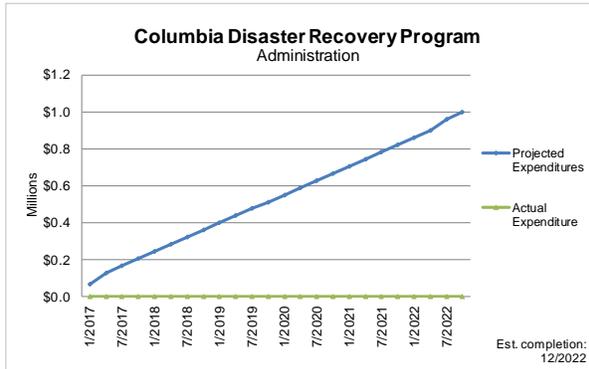
Comment 35:

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.

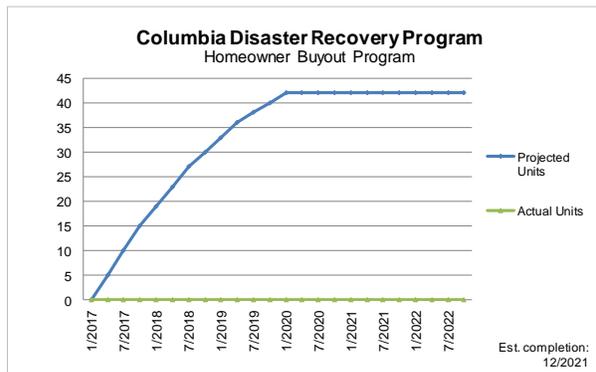
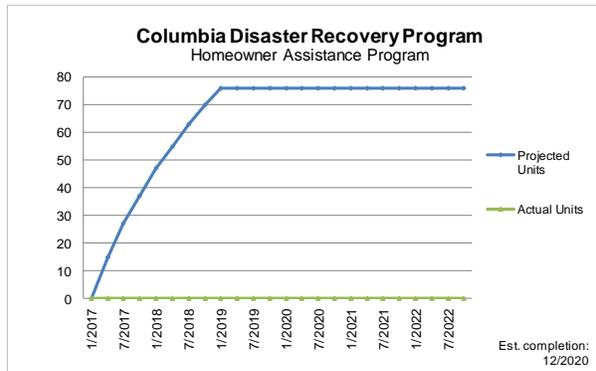
Response: The City of Columbia appreciates the support of all agencies who have supported the city's flood recovery efforts. As such, the city looks forward to working with Operation HOPE in conjunction with EDA in order to assist affected households and businesses.

8.3 Exhibit C – CDBG-DR Expenditure Projections

Financial

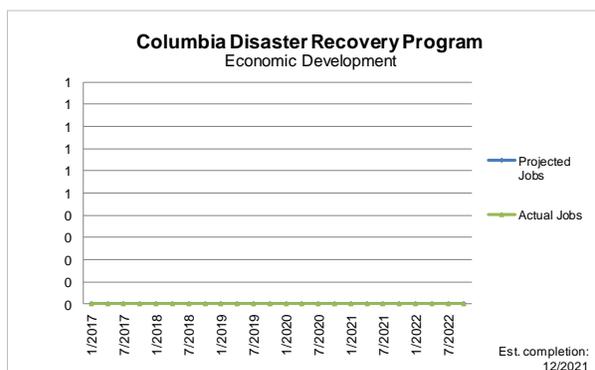
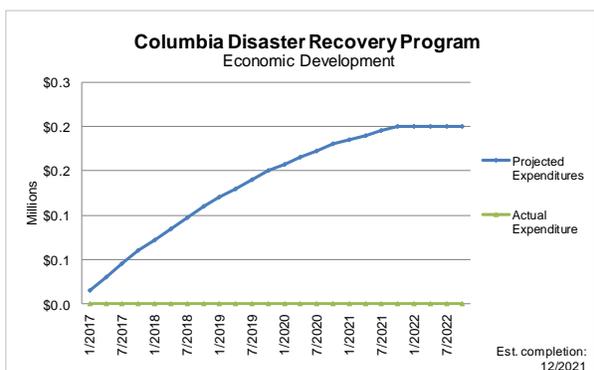
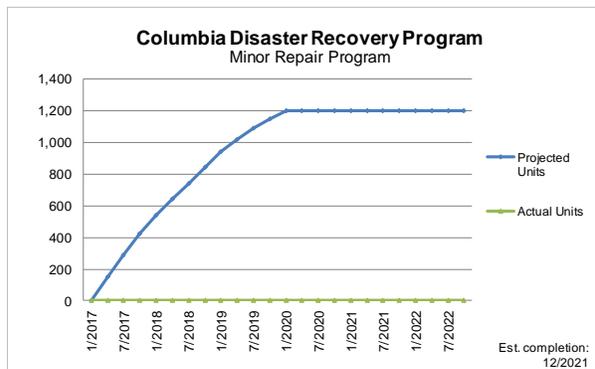
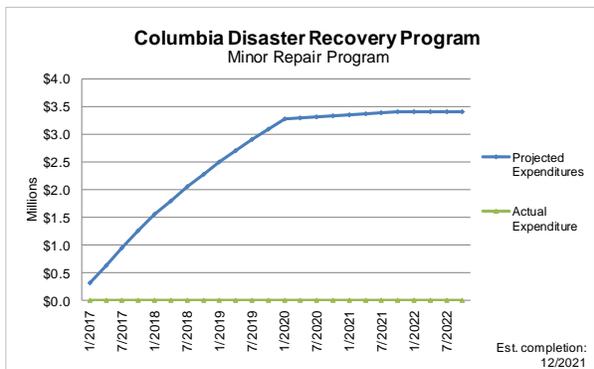
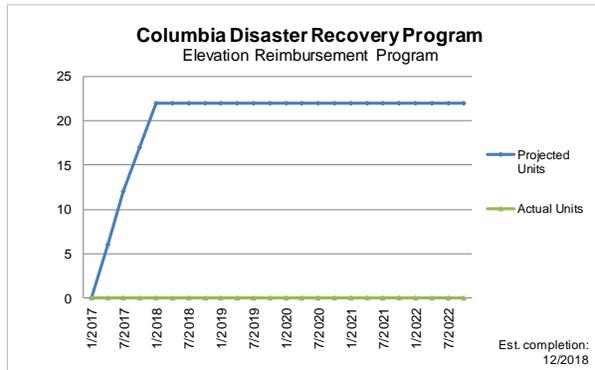
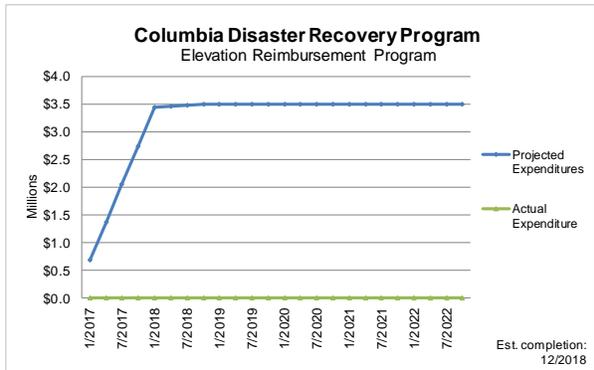
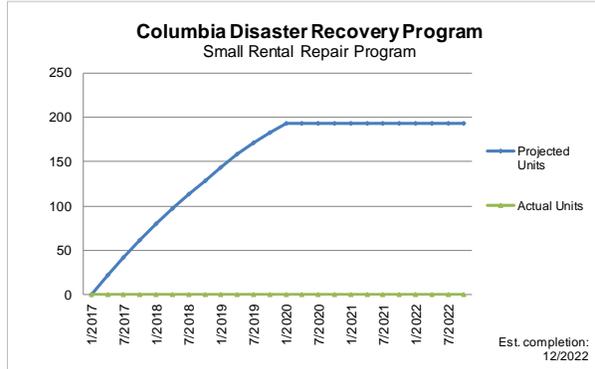
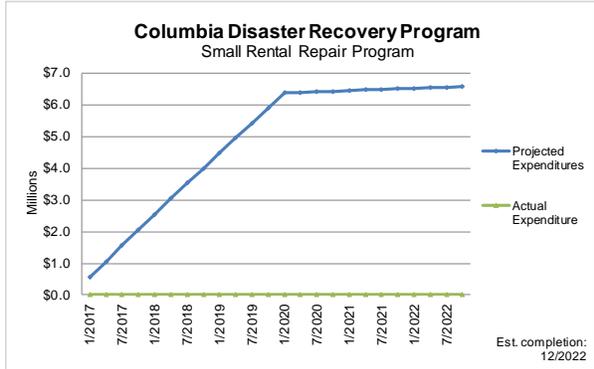


Performance



Financial

Performance



Performance Projections Continued

Homeowner Assistance Program	Year 3				Year 4			
	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Households: 76								
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			
	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Households: 42								
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			
	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Households: 193								
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			
	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Households: 22								
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)								

3 years

Minor Repair Program	Year 3				Year 4			
	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Households: 1,198								
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			
	1/2019	4/2019	7/2019	10/2019	1/2020	4/2020	7/2020	10/2020
Jobs:								
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			
	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Households: 76								
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			
	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Households: 42								
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			
	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Households: 193								
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			
	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Households: 22								
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)								

3 years

Minor Repair Program	Year 5				Year 6			
	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Households: 1,198								
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)								

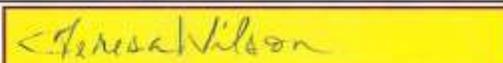
Economic Development	Year 5				Year 6			
	1/2021	4/2021	7/2021	10/2021	1/2022	4/2022	7/2022	10/2022
Jobs:								
Projected Jobs	0	0	0	0	0	0	0	0
# of Jobs Created/Retained (Quarterly Projection)	0	0	0	0	0	0	0	0
Actual Jobs	0	0	0	0	0	0	0	0
# of Permanent Jobs Created								
# of Permanent Jobs Retained								

8.4 Exhibit D – SF-424 Form and Checklists

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

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input style="background-color: yellow;" type="text"/>	4. Applicant Identifier: <input type="text" value="B-16-MH-45-001"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
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" value="City of Columbia"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="57-6000229"/>	* c. Organizational DUNS: <input type="text" value="073707366000"/>	
d. Address:		
* Street1: <input type="text" value="1225 Lady Street"/>	Street2: <input type="text" value="P.O. Box 147"/>	
* City: <input type="text" value="Columbia"/>	County/Parish: <input type="text" value="Richland"/>	
* State: <input type="text" value="SC: South Carolina"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input style="border: 2px solid red;" type="text" value="29217"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Community Development"/>	Division Name: <input type="text" value="Community Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Gloria"/>	
Middle Name: <input type="text" value="J."/>	* Last Name: <input type="text" value="Saeed"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Interim Director"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="803-545-3766"/>	Fax Number: <input type="text" value="803-545-255-8912"/>	
* Email: <input type="text" value="gsaeed@columbia.sc.net"/>		

Application for Federal Assistance SF-424			
* 9. Type of Applicant 1: Select Applicant Type:			
C: City or Township Government			
Type of Applicant 2: Select Applicant Type:			
Type of Applicant 3: Select Applicant Type:			
* Other (specify):			
* 10. Name of Federal Agency:			
U.S. Department of Housing and Urban Development			
11. Catalog of Federal Domestic Assistance Number:			
14-228			
CFDA Title:			
Community Development Block Grant Disaster Recovery (CDBG-DR)			
* 12. Funding Opportunity Number:			
PR-5938-N-01			
* Title:			
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:			
Title:			
14. Areas Affected by Project (Cities, Counties, States, etc.):			
	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
* 15. Descriptive Title of Applicant's Project:			
City of Columbia Community Development Block Grant Disaster Recovery (CDBG-DR) Program			
Attach supporting documents as specified in agency instructions.			
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>	

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	19,999,000.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	1,000,000.00
* g. TOTAL	20,999,000.00
* 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 <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
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@columbiaac.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:

State or Entitlement: **Entitlement**

Date Plan Submitted: **9/20/2016**

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

Date Plan Reviewed:

Amount of Funds Allocated in Plan: **\$19,989,000 CDBG-DR + \$1,000,000 in CDBG Program Income**

Submitted within 90 days of

Reviewer/Title: **Gloria Saeed**

Federal Register Notice? **Yes**

Criteria:		Yes <i>(provide</i>	No <i>(provide justification)</i>
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 4-19)	
(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?	Yes (Pages 4-19)	
	(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?	Yes (Pages 19-20)	
	(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?	Yes (Pages 4-19)	
	Does the grantee assess whether public services are necessary to complement activities intended to address housing and economic revitalization needs?	Yes (Pages 19-20)	
	(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?	Yes (Pages 4-19)	
	(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 ?	Yes (Pages 5-14)	
	(h) Does the assessment take into account the costs of incorporating mitigation and resiliency measures to protect against future hazards?	Yes (Pages 21, 24 & 25)	
(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 4-19)	
(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)?	Yes (Page 29)	
	(b) How the grantee will coordinate with other local and regional planning efforts to ensure consistency?	Yes (Page 29)	
(4) Leveraging Funds	How the grantee will leverage CDBG disaster recovery funds to generate a more effective and comprehensive recovery?	Yes (Page 30)	

(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 (Page 31)	
	(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 (Page 31)	
	(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 (Page 31)	
	(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 (Page 31-32)	
	(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 32)	
(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 (Page 32)	
(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;	Yes (Pages 19-20)	
	(b) HUD-assisted housing (as defined by the Notice); and	Yes (Pages 19-20)	
(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 19-20)		
(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 24-33)	

(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:	Yes (Page 32 & Pages 19-20)	
		(a) Transitional housing, permanent supportive housing and permanent housing needs of individuals and families (including subpopulations) that are homeless or at risk of being homeless?	Yes (Page 32 & Pages 19-20)	
		(b) Prevention of low-income individuals and families with children (especially those with incomes below 30 percent of median) from becoming homeless?	Yes (Page 32 & Pages 19-20)	
		(c) The special needs of persons who are not homeless but require supportive housing (e.g., populations identified in 24 CFR 91.315(e) or 91.215(e) as applicable)?	Yes (Page 32 & Pages 19-20)	
		(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 (Page 20)	
(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 (Page 33)	
(11)	Program Income	How the grantee will manage program income, and the purpose(s) for which it may be used?	Yes (Page 34)	
(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 34-38)	
B. State Grantees Only				
Does the Action Plan describe:				
(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?	N/A	
		(b) The threshold factors or applicant eligibility criteria, grant size limits and proposed start and end dates?	N/A	
		(c) How the projected use will meet CDBG eligibility criteria and a national objective?	N/A	
		(d) How the projected uses relate to a specific impact of the disaster and will result in long-term recovery?	N/A	
(f) Has the grantee identified any ineligible activities (e.g., use of CDBG-DR for forced mortgage payoff, construction of dam/levee beyond original footprint, incentive payments to households that move to disaster-impacted floodplains, assistance to privately-owned utilities, not prioritizing assistance to businesses that meet the definition of a small business, or assistance for second homes)? Are all activities and uses authorized under title I of the Housing and Community Development Act of 1974 or allowed by waiver or alternative requirement published in this Notice?	N/A			
(16)	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 21-29)	
(18) Basis for Allocations	How the needs assessment informed the allocation determinations?	Yes (Pages 4-20)	
(19) Program/Activity Details	For each program or activity that will be carried out by the UGLG or through a subrecipient:		
	(a) The projected uses of the CDBG-DR funds, including the administering entity, budget and geographic area?	Yes (Pages 21-29)	
	(b) The threshold factors or applicant eligibility criteria, grant size limits and proposed start and end dates?	Yes (Pages 21-29)	
	(c) How the projected use will meet CDBG eligibility criteria and a national objective?	Yes (Pages 21-29)	
	(d) How the projected use relates to a specific impact of the disaster and will result in long-term recovery?	Yes (Pages 21-29)	
	(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?	Yes (Page 21-29) all proposed activities are eligible expenses	
(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	N/A		
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 39)	
(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 39)	
(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 39 & Pages 4-19)	
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 (Pages 44 & 50)	
(24) Budget	Does the Plan include a chart or table that illustrates, at the most practical level, how all funds are budgeted?	Yes (Page 4)	
(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 44 & 50)	

(26)	Publication	Was the proposed Plan published before its adoption? Note: Correct answer is "yes".	Yes (Pages 44 & 50)	
(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 (Page 44)	
(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 50)	
(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 19-20)	
(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 (Page 44 & 50)	
(31)	Receipt of Comments	Did the grantee provide a reasonable timeframe and method (including electronic submission) for receiving comments on the plan?	Yes (Pages 40-60)	
(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 43)	
(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 50-60)	
(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 (Page 4)	
(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 (Page 41)	
(36)	Risk Analysis Documentation	Has the grantee submitted the Risk Analysis Documentation as described in the Notice?	Yes (Page 43)	
(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 (Page 44 and 49)	
(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	
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 45 and Action Plan Checklist)	
(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 45)	
(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 45)	
(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 (Page 61-66)	

(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 46)	
(44)	Approved	Is the Plan approved?	Yes (Page 46)	
(45)	Reason(s) for Resubmittal	If the Plan needs to be re-submitted, please indicate the reasons.	N/A	

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
<p data-bbox="207 1119 979 1140">h. The grantee certifies that it is complying with each of the following criteria:</p> <p data-bbox="277 1150 1239 1329">(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.</p> <p data-bbox="277 1339 1239 1423">(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.</p> <p data-bbox="277 1434 1239 1518">(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.</p> <p data-bbox="277 1528 1239 1791">(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).</p>	<p data-bbox="1268 1150 1360 1171">Yes</p> <p data-bbox="1268 1339 1360 1360">Yes</p> <p data-bbox="1268 1434 1360 1455">Yes</p> <p data-bbox="1268 1528 1360 1549">Yes</p>
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>	