

RICHLAND COUNTY

Community Development Block Grant
Disaster Recovery (CDBG-DR)

Action Plan

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SECTION 1. INTRODUCTION

On September 27, 2015, Hurricane Joaquin (Joaquin) developed over the Atlantic Ocean and strengthened into a Category 4 hurricane over the following several days. One of the largest storms to ever strike South Carolina, Joaquin brought historical rainfall and freshwater flooding throughout Richland County before dissipating on October 7, 2015. Unprecedented rainfall and the resulting 1,000 year flood event created major public safety threats and wrought considerable damage throughout the County including the destruction of homes, businesses, infrastructure, public facilities, and the impairment of the local and regional economy. On October 5, 2015, in response to these impacts, the President issued a major disaster declaration under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 United States Code (U.S.C.) 5121 et seq. (the “Stafford Act”).

\$23 million in CDBG-DR Funding has been awarded to Richland County, South Carolina to

“...help to meet remaining unmet housing, economic development, and infrastructure needs that resulted from thousands of homes and small businesses being damaged or destroyed”

In the wake of this historical flood event, Richland County immediately began the long and arduous process of rebuilding. Over the weeks and months that followed, Richland County departments, with support from numerous organizations and volunteers, undertook a series of critical emergency response and recovery efforts. Vast quantities of debris were removed from roads, streams, and property throughout the County while essential infrastructure including roads, utilities, and municipal facilities were repaired. Concurrently, public health and safety issues were identified and addressed including emergency sheltering, temporary housing, medical attention, provision of household necessities, drinking water protection, housing repairs, and counselling among many others. Despite these efforts, the road to full recovery is long and many of the storm’s impacts remain unaddressed throughout the County.

In response to the magnitude of remaining recovery needs, The U.S. Department of Housing and Urban Development (HUD) Secretary Julián Castro announced on February 29, 2016, that \$157 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds would be provided to South Carolina communities, including \$23.5 million to Richland County. These resources provide a critically important opportunity to continue recovery efforts in Richland County, and are intended to

“...help to meet remaining unmet housing, economic development, and infrastructure needs that resulted from thousands of homes and small businesses being damaged or destroyed.”

Richland County, South Carolina has prepared this Action Plan as required by HUD to guide the expenditure of \$23,516,000 in CDBG-DR funding to assist the most impacted and distressed areas resulting from the presidentially declared flooding disaster of October 2015. This Action Plan assesses remaining unmet housing, infrastructure, and economic needs, and presents a series of programs and projects to maximize the recovery and resilience potential of this important resource.

1.1 Purpose and Authorization of the CDBG-DR Action Plan

Section 420 of the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2016 (Pub. L. 114– 113, approved December 18, 2015) (Appropriations Act) provides up to \$300 million to assist communities in recovering from major disaster declarations in 2015. Funding is made available through the CDBG-DR program and is intended 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 resulting from a major disaster declared in 2015, pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 *et seq.*).

Utilizing the best available data, HUD determined significant unmet recovery needs in Richland County, South Carolina, and has provided notice of a direct allocation of **\$23,516,000 in funding to address impacts related to Hurricane Joaquin and adjacent storm systems**. The Appropriations Act requires that funds be used only for specific disaster-related purposes, and requires that prior to the obligation of funds a grantee shall submit a plan detailing the proposed use of all funds within 6 years. To comply with HUD requirements, this Action Plan describes Richland County's strategy for utilizing limited CDBG-DR funds to address unmet housing, infrastructure, and economic development needs within the most impacted areas resulting from severe flooding and storms.

1.2 Planning, Coordination, and Consistency

Richland County developed This Action Plan with the participation and support of numerous County departments and community and stakeholder organizations, as well as coordination with relevant federal and state entities. While Richland County is the primary entity responsible for management of CDBG-DR funding, these participating organizations were essential partners and provided information throughout the planning process and also helped ensure consistency with other local and regional planning efforts. The programs and activities outlined within this Action Plan have been designed to be consistent with key planning documents including:

- Richland County Comprehensive Plan
- Richland County CDBG Consolidated Plan
- Richland County Intermediate Recovery Plan
- Richland County Capital Improvement Plan

Richland County worked closely with several key groups throughout the development of this Action Plan, including the Richland – Lexington County Long Term Recovery Group (LTRG), Richland County Disaster Recovery Working Group (Working Group), and the Blue Ribbon Advisory Committee (Advisory Committee). These groups brought a wealth of local knowledge and resources to the process and assisted with the assessment of unmet needs and development of the most effective recovery programs. These groups fostered collaboration, ensured regional consistency, and promoted stakeholder engagement throughout the development of this Action Plan. Coordination with each of these groups also allowed Richland County to establish open communication channels and relationships that will support implementation of recovery activities. Each group is described below.

Richland – Lexington Long Term Recovery Group

The major local and national voluntary organizations active in disaster (VOAD) in the Midlands region have collaborated to form the Richland – Lexington County LTRG. United Way was selected by the participating VOADs to organize and facilitate the process and to provide support staffing. The LTRG organization follows a national best practice in how volunteer organizations work together to coordinate their recovery activities in order to promote effectiveness and efficiencies, reduce duplicative services, and prevent residents with needs from dropping through the cracks.



Richland County Disaster Recovery Working Group

The Richland County Disaster Recovery Working Group (Working Group) provided oversight and strategic direction throughout the preparation of this Action Plan. The Working Group consisted of representatives of the following County departments:

- Richland County Administration
- Richland County Clerk of Council
- Richland County Legal Department
- Richland County Emergency Services Department
- Richland County Sheriff's Department
- Richland County Community Development Department
- Richland County Utilities Department
- Richland County Finance Department
- Richland County Assessor's Office
- Richland County Public Works Department
- Richland County Planning and Inspections Department
- Richland County Procurement Department
- Richland County Information Technology (GIS) Department
- Richland County Public Information Office

The Working Group participated in meetings on an approximately bi-weekly basis during the plan development and were responsible for helping to provide historical and local context to the disaster and any related data and information relevant to their areas of responsibility. The Working Group offered guidance related to their field of expertise, assistance with public outreach, and participation in the development of programs and projects funded through the CDBG-DR program.

The Working Group also provided assistance to ensure that recovery activities are feasible and consistent with other local and regional efforts. When establishing goals and identifying recovery programs and projects, the Richland County Work Group met regularly to verify consistency with other planning and related departmental efforts.

Richland County Blue Ribbon Advisory Committee

The Blue Ribbon Advisory Committee (Advisory Committee) consists of local stakeholders who form a diverse and knowledgeable representation of the County and its local communities. The Advisory Committee met throughout the development of the Action Plan and operated in an advisory capacity for the Working Group and County Council. The Advisory Committee included representatives from numerous stakeholder groups including:

- Richland County Government Officials
- Richland County municipalities
- Gills Creek Watershed Association
- Sustainable Midlands
- Conservation Commission
- VOADs
- South Carolina Department of Emergency Management
- Lower Richland County
- Underserved Populations

The Advisory Committee was charged with helping to steer the overall direction of the Action Plan and ensuring that as many stakeholder groups and interests would be included in the planning process as possible. Throughout the process, the Advisory Committee supported public engagement strategies, identified unmet needs, and assisted with identification and prioritization of programs and projects proposed for CDBG-DR funding.



SECTION 2. UNMET NEED ASSESSMENT

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

This section describes Richland County’s preliminary assessment of unmet recovery needs resulting from the October severe storm and flooding disaster (DR 4241). When major disasters occur, a significant amount of data and information must be collected and analyzed from numerous agencies, departments, and organizations. Accessing and compiling information on impacts and recovery resources can be a significant challenge due to varying quality, availability, formatting, and timing of different sources. Estimates of unmet needs are based on the best available information as of August 2016, and represent the County’s initial calculation of remaining recovery gaps. This assessment should be considered a living document that will be updated as additional information becomes available.

Unmet needs were estimated through a comparison of financial impacts of the qualified disaster event with subsequent recovery funding that has been received or is anticipated. This assessment incorporates data from the following key sources:

- Federal Emergency Management Agency (FEMA) Individuals and Household Assistance Program (IHP)
- FEMA Public Assistance Program (PA)
- Small Business Administration (SBA)
- National Flood Insurance Program (NFIP)
- Richland County Departmental reports and studies
- Engineering estimates
- National Atmospheric and Oceanic Administration (NOAA)
- United States 2010 Decennial Census
- 2014 American Community Survey (ACS)
- Public and Stakeholder outreach and feedback.

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

2.1 Disaster Impact Overview

The flooding event that impacted the State of South Carolina from October 1 through 5 was unprecedented, damaging thousands of homes and destroying significant infrastructure including roads, bridges, dams, and levees. Richland County was at the center of this federally declared disaster and was severely impacted by freshwater flooding. As flood waters inundated low lying areas throughout the County, homes underwent considerable damage, and for some, complete destruction. The severe storms resulted in a multitude of other impacts including damage to both public and private property, public service interruptions, and impairment of



the regional economy. Richland County was one of the most impacted areas in the State, with many residents unable to remain in their homes or access businesses or facilities that provide food, water, medical care, and other basic needs. Other citizens who rely on wells for their drinking water experienced well head breaches and contamination of their essential drinking water.

On October 4, 2015, Richland County received more than 20 inches of rainfall as a result of the development of Hurricane Joaquin off the Atlantic coast. This considerable rainfall over a short period of time produced dangerous flood conditions that impacted numerous communities in the Southeast, North, Northeast, and Northwest portions of the unincorporated areas of Richland County. While Hurricane Joaquin did not make landfall over the State, the convergence of weather events with local conditions resulted in severe storms producing record rainfall over a 5-day period. The 21.24 inches of rain has been classified as a 1,000-year storm event breaking all historical rainfall records for the State including the 1,000 year estimate of 13.80 inches. While the storm soaked the region for several days, the heaviest rainfall occurred between October 3rd and 4th, resulting in a FEMA disaster declaration on October 5th (DR-4241).

Following the flood event, assistance from traditional recovery programs such as FEMA, SBA, and NFIP, as well as non-profits, have made many recovery projects possible. Despite this assistance, however, extensive unmet recovery needs remain throughout the County. Richland County’s unique conditions combined with the unprecedented flood event resulted in impacts that far exceed available assistance. Of greatest concern is that the extent of damages resulted in many critical recovery needs not addressed by or not eligible for traditional recovery programs. The lack of adequate recovery assistance has left significant numbers of residents and business owners without the help they need. In particular, many structures outside of the floodplain and without flood insurance were damaged, thousands of residents were denied assistance or received minimal assistance, numerous delayed impacts occurred after deadlines for assistance, infrastructure repairs and resiliency projects require additional funding, and considerable economic needs likely remain.

2.2 Unmet Need Summary

Through the review of best available data and information, **Richland County identified a total of \$251,934,883.81 in unmet recovery needs.** Of these needs, housing assistance was identified as the largest area of unmet need followed by infrastructure, and then economic development. It is critical to understand that these figures should only be considered as initial estimates based on the available information at the time this plan was developed. Many impacts are very difficult or impossible to quantify and others cannot be identified at this time due to missing data. As such, **the figures presented in this section are to be considered only as preliminary estimates and not as definitive facts regarding the true unmet needs in the County.**

Table 1 provides a summary of estimated unmet needs in Richland County across the core areas of housing, infrastructure, and economic development.

Table 1 – Unmet Need Summary

Recovery Area	Damage/Need	Assistance Received/Anticipated	Unmet Need
Housing	\$271,206,792	\$77,094,925.06	\$194,111,866.94
Infrastructure	\$52,800,594.43	\$6,667,982.93	\$46,132,611.50
Economic Development	\$36,213,959.50	\$24,523,554.13	\$11,690,405.37
Totals	\$360,221,345.93	\$108,286,462.12	\$251,934,883.81



2.3 Funding Assistance Received or Expected

While the impacts of the disaster far outweigh the available funding, Richland County greatly appreciates the contributions and resources provided by the numerous organizations that have assisted with ongoing recovery efforts. Assistance from these recovery partners has allowed for completion of a number of critically important projects including home repairs, social services, infrastructure repairs, and well disinfection among many others. Additional details related to these completed and ongoing recovery efforts are provided in Section 2.9.

Table 2 - Summary of Financial Assistance Received or Anticipated

Assistance Program	Housing	Infrastructure	Economic Development	Total
FEMA IA	\$19,616,108.43			\$19,616,108.43
FEMA PA		\$2,999,892.43		\$2,999,892.43
FEMA Hazard Mitigation Grant Program (HMGP)	\$4,437,365.63	\$2,668,126.50	\$2,826,838.13	\$9,932,329.76
SBA	\$38,944,000		\$16,800,800	\$55,744,800
NFIP	\$13,541,451			\$13,541,451
Richland Restores (CDBG)	\$300,000			\$300,000
State Insurance Reserve Fund	\$256,000			\$256,000
State FEMA Match		\$999,964		\$999,964
Agriculture Insurance payments and deductibles			\$4,813,047	\$4,813,047
Disaster Unemployment Assistance			\$82,869	\$82,869
Total Assistance Received	\$77,094,925.06	\$6,667,982.93	\$24,523,554.13	\$108,286,462.12

2.4 Demographic Profile of Impacted Areas

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

2.4.1 Total Population and Age

According to the 2010 U.S. Census, Richland County had a total population of 384,504 people residing in 145,194 households with an average household size of 2.43. The median age of County residents in 2010 was 32.6 with 22.8% of the population under the age of 18 and 9.8% over the age of 65. These figures indicate that Richland County residents are generally younger than the State as a whole which, as of 2010, had a median age of 37.9 and a smaller percentage of residents over 65 years of age (Table 3).



Table 3 - County and State Population and Age Statistics

Municipality	U.S. Census 2010					
	Total	Pop. 65+	% Pop. 65+	Pop. <18	% Pop. <18	Median Age
Richland County	384,504	37,541	9.8	87,553	22.8	32.6
State of South Carolina	4,625,364	631,874	13.7	1,080,474	23.4	37.9

Source: Census 2010 (U.S. Census Bureau);
 Note: Pop. = population

2.4.2 Race, Ethnicity, and Language

According to the 2010 U.S. Census, the County’s population is predominantly white (47.3%) and Black or African American (45.9%). Other races include Asian (2.2%), American Indian and Alaskan Native (0.3%), Native Hawaiian and Other Pacific Islander (0.1%), some other race (1.9%), and two or more races (2.2%). Richland County’s population also includes 18,637 Hispanic or Latino residents who account for approximately 4.8% of the population. As evidenced by Table 4, the racial composition of the County differs from the State as a whole, with the largest difference being the larger percentage of Black or African American residents in Richland County than in the State.

Table 4 - Richland County Race and Ethnicity

Area	U.S. Census 2010							
	Hispanic Or Latino	White	Black Or African American	America Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two Or More
Richland County	18,637 (4.8%)	181,974 (47.3%)	176,538 (45.9%)	1,230 (0.3%)	8,548 (2.2%)	425 (0.1%)	7,358 (1.9%)	8,431 (2.2%)
State of South Carolina	235,682 (5.1%)	3,060,000 (66.2%)	1,290,684 (27.9)	19,524 (.4%)	59,051 (1.3%)	2,706 (0.1%)	113,464 (2.5%)	79,935 (1.7%)

Source: 2010 Decennial Census

According to the ACS, 91.6% of Richland County’s population speak only English and 8.4% speak a primary language other than English. The most prevalent language spoken in the County other than English is Spanish, which is spoken by 3.4% of the population (12,712 residents). The ACS estimates that 3.2% percent of the residents speak English “less than very well.”

2.4.3 Education

At the time of the 2014 ACS, an estimated 89.1% of Richland County’s residents had graduated from high school or had a higher level of education and training, and 37.6% had completed a bachelor’s degree or higher level of education and training.

2.5 Vulnerable and Special Needs Populations

When conducting recovery efforts, it is essential to accurately identify potential vulnerable populations in the study area. These populations can face unique challenges and have more difficulty responding to hazard events than the general population due to physical and financial capabilities, health concerns, and location and quality



of their housing, among other factors. For the purposes of this planning process, vulnerable populations include children; elderly; low-income; the physically, developmentally, or mentally disabled; the homeless; and the medically dependent.

2.5.1 Children and Elderly

Households with children or elderly residents may experience additional vulnerabilities during disaster events and subsequent recovery efforts. Limited mobility, required medicine, physical ailments, or fragility all increase the safety risks for these individuals and their family members in emergency situations. As such, ensuring that these households have access to information, resources, and quality housing stock to allow for sheltering in place is a priority for Richland County's long-term public safety and community resilience.

As of 2014, 28.6% (41,951 households) of households in the County had at least 1 child, and 22.2% (32,524 households) included at least one person 65 years or older. In addition, 8.7% (12,788 households) of households were made up of people 65 years or older living alone, which creates even greater vulnerability.

2.5.2 Economic Hardship

Financial hardships can have far-reaching implications for residents and especially for young families and the younger workforce. A household that experiences financial difficulties may find it challenging or impossible to make necessary repairs or investments that can increase safety and resilience. According to the 2014 ACS, the median household income in the County was \$50,028. A total of 17.2 percent of the population were considered below the poverty line in 2014; 5.2% received Supplemental Security Income; 1.4% received cash public assistance; and 13.9% received Food Stamps and Supplemental Nutrition Assistance Program (SNAP) benefits.

HUD considers families that pay more than 30% of their income for housing to be cost burdened, and as a result, likely to experience significant economic hardship. These individuals are likely to have amplified recovery needs due to a lack of resources to invest in improvements to increase preparedness, property protection, and recovery. Among current homeowners with a mortgage in Richland County, the 2014 ACS reports that 27.1% spend more than 30% of their income on monthly housing costs. Among renters, 53.6% spend more than 30% of their income on monthly housing costs, which indicates a significant group of people with serious economic hardship. In addition, the Richland County 2012-2016 CDBG Consolidated Plan reported existence of 6,100 moderately or severely cost burdened elderly owner and renter households, and over one-half (3,365) of these were severely cost burdened. Many of these households (4,450) appear to be householders living alone, as they are counted as non-family, elderly.

Residents with Disabilities or Health Concerns

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

According to the 2014 ACS survey, 44,435 civilians (11.8% of the population) have a disability in Richland County. Of these individuals, 2,370 are children and 15,786 are over the age of 65. Children and elderly with disabilities are even more vulnerable and must be included in the planning and implementation of disaster



recovery and resiliency initiatives. In addition, The Richland County 2012-2016 CDBG Consolidated Plan reports an estimated 23,070 persons with severe mental disorders, an estimated 9,613 developmentally disabled persons, and an estimated 20,600 persons with a physical disability in the County.

Homeless Population

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

According to the Richland County 2012-2016 Consolidated Plan for Housing and Community Development, 1,621 persons in the 14-county Midlands Area Consortium for the Homeless (MACH) were identified in 2011 as homeless under the HUD definition, and nearly half (43.3%) were living unsheltered. Of the 1,621 people identified as homeless, 71.3% were African-American and 25.7% were Caucasian, with smaller percentages of Hispanic and other racial groups identified. Families with children comprised a quarter (24.9%) of those homeless, and 26.6% of adults surveyed were identified as having a disability, with many having more than one disability. Of the 14 counties in MACH, Richland County had the largest number of homeless, 1,065 of the region’s 1,621 persons; this is 65.7 percent of the homeless in the region.

The at-risk population of persons and families in danger of becoming homeless are primarily the individuals or families with limited income who are facing immediate eviction and cannot identify another residence or shelter. Data from 2009 indicated presence of 9,445 renter and 4,210 owner households in the extremely low-income group in Richland County experiencing a cost burden from their housing costs, many of whom are facing a severe cost burden. Averaging 2.4 persons per household, this represents over 33,000 people. These very low-income households are at the greatest risk of becoming homeless.

2.6 Housing

This section describes Richland County’s identified housing impacts and the methodology for calculating the total unmet housing need of \$194,111,866.94.

Recovery Area	Damage/Need	Assistance Received/Anticipated	Unmet Need
Housing	\$271,206,792	\$77,094,925.06	\$ 194,111,866.94

2.6.1 Housing Damage Summary

Damages to the County’s housing stock were among the most severe and costly impacts of the October severe storms and flooding. Thousands of homes of all types were damaged or destroyed by the widespread rain and flooding, including single family and multi-family units, owner and renter properties, mobile homes, and public housing units. Based on the best available data, it is estimated that, at minimum, 10,000 homes, including both owner and renter occupied units, were damaged during the October 2015 flood.

As heavy rains and deep flood waters rushed over low lying areas, property damages included impacts to foundations, enclosures, framing, interior walls, essential systems (heating, venting, and air conditioning [HVAC], electrical, sewer/water, etc.), windows and doors, as well as the loss of personal belongings and other



household items. The storm also resulted in contamination of hundreds of private wells that required disinfection services due to Coliform/E. Coli contamination.

Because the flooding and damage occurred over such a large portion of the County, residents of all demographics and income levels were affected. For many, the extent of damage left them unable to live in their homes for weeks or months. Nearly a year after the event, some residents are still unable to return to their homes due to the extent of damage and lack of financing to make repairs. While some impacted households were able to access assistance from FEMA, SBA, private insurance, non-profit assistance, or other sources, many only received funding to complete basic repairs and are now living in homes with critical safety and quality of life issues.

It is important to note that housing impacts from the October storm event were not limited to the days and weeks immediately following the flood. The quantity of flood water saturated both soils and homes so extensively that landscapes and property conditions continued to change well after the initial flood event. Shifting soils, altered landscapes, and lingering moisture have caused a variety of delayed impacts including mold, sinking foundations, compromised root systems, and falling tree damage, among others. Importantly, many of these impacts occurred after the registration deadline for FEMA assistance.

To estimate the financial damages from these numerous impacts, Richland County gathered the best available data from federal, state and local resources. These resources include damage assessments from federal agencies and county departments, as well as information gathered from non-profit organizations and through public outreach.

FEMA Damage Assessment

FEMA's Individuals and Households Program (IHP) provides important data that helps to better understand the locations and extents of damages in the County. The IHP is one of the primary federal sources of recovery assistance, and provides damage assessments, known as Full Verified Loss (FVL) estimates, for eligible households. As of June 2016, 20,279 households had registered for FEMA IHP assistance. Of these applicants, damage assessments were conducted for 10,016 (8,744 homeowners and 1,269 renters) homes, which **totaled approximately \$18 million in real property verified losses and \$4 million in personal property verified losses for a total of \$22 million in FVL and an average FVL of \$2,206.**

Importantly, these figures underestimate the true damages to the County's housing stock, as they do not represent the costs to fully rehabilitate a home to its pre-disaster conditions. While a useful component of the unmet needs analysis, these figures are limited to only costs to "repair the home to a safe and sanitary living or functioning condition." These estimates also do not include residents who did not register for FEMA or those who were denied a damage assessment.

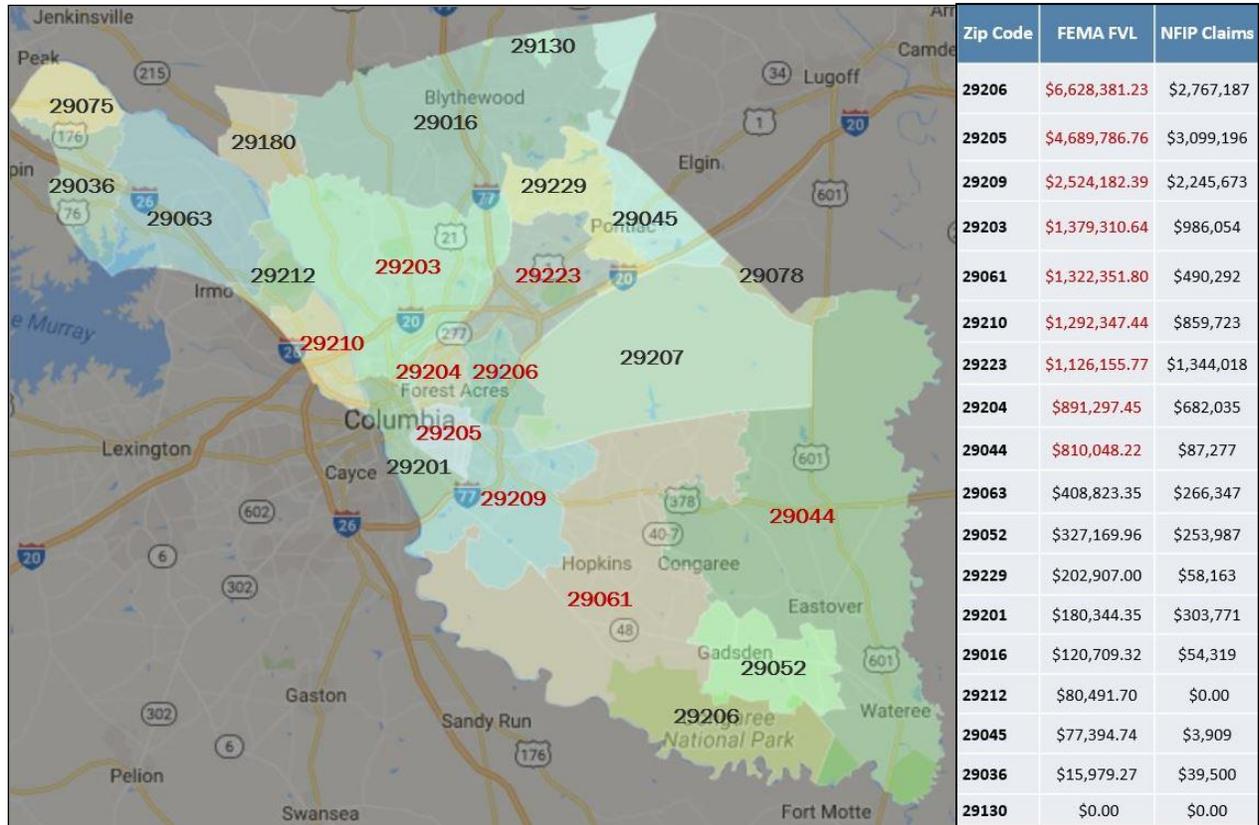
NFIP Claims

The National Flood Insurance Program (NFIP) provides additional information regarding locations and extents of damages in the County. As of August 2016, 362 claims had been filed through the NFIP, and a total of \$13,541,451 had been provided to Richland County residents. The average claim amount to date has been \$37,510.9. When comparing the 362 total NFIP claims with the more than 10,000 homes with assessed damages from FEMA, it becomes clear that a significant number of homes in the County were damaged that did not have flood insurance.



Figure 1 below shows FEMA FVLs and NFIP Claims grouped by zip code. This information assists in identifying the geographic areas most impacted by the storm.

Figure 1 - FEMA FVLs and NFIP Claims Grouped by Zip Code



Small Business Administration (SBA) Loans

SBA loans are another key source of information for estimating unmet needs. Unlike FEMA damage inspections, SBA damage assessments and loans represent the full damage to the home and the amount necessary to fully repair it back to pre-storm conditions. For this reason, SBA data are typically used to calculate an average rebuild cost and unmet needs. As of September 2016, SBA had provided \$38,944,000 in low interest loans for homeowners. Unfortunately, information regarding the total number of loans approved and individual loan amounts was not available at the time this plan was developed.

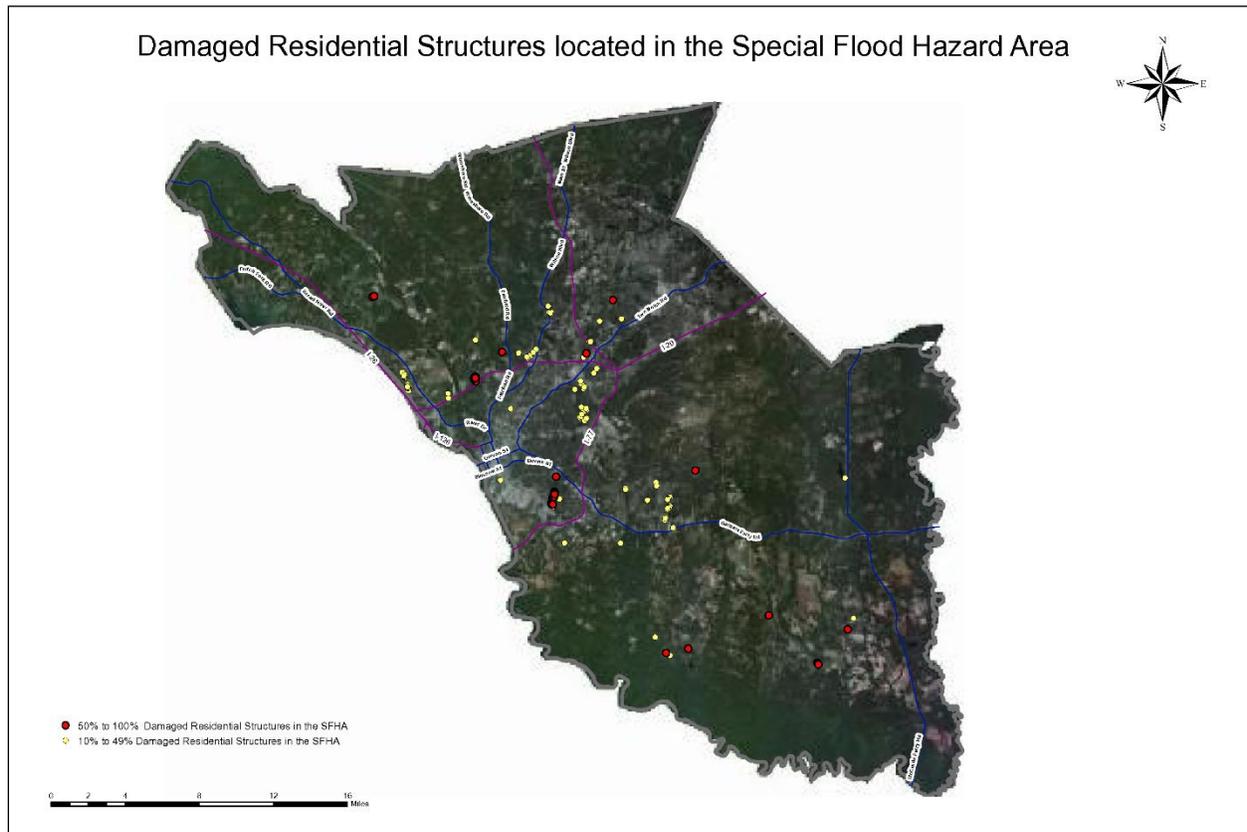
Special Hazards Flood Area Damage Assessment

An additional source of information for estimating damages and homes with unmet needs was provided by an assessment of all 1,700 structures located in the Special Hazards Flood Area (SFHA). The assessment, performed by Richland County, with support from FEMA contractors, identified 179 homes in the floodplain with substantial damage (greater than 50% damaged) totaling more than \$17 million, and a total of 425 homes with varying levels of damage for a total of \$31,713,194 and an average damage of \$74,619. These figures were used to complement other available damage estimates and provide additional insight into the number and severity of damages in the County. These estimates, however, only represent a small portion of damages in

the County, as they do not include the large number of homes located outside of the floodplain that underwent damage during the storm.

Figure 2 below illustrates the damaged residential structures located in the SFHA.

Figure 2 - Damaged Residential Structures Located in the Special Flood Hazard Area



2.6.2 Impacts on Low and Moderate Income Households

HUD requires that at a minimum, 70% of the total CDBG-DR funds benefit households of low to moderate income (LMI). LMI limits are determined by HUD based on the Area Median Income of the County, and are categorized by number of persons in the family. LMI households are those who earn less than 80% of the community’s Area Median Income. For fiscal year 2016 in Richland County, the median income defined by HUD is \$64,100. For a family of four, this corresponds to an Extremely Low Income limit of \$24,300, a Very Low Income limit of 32,050, and a Moderate Income limit of \$51,300. Table 5 illustrates HUD-defined income limits for determining qualified LMI households.



Table 5 - FY 2016 Income Limit Summary

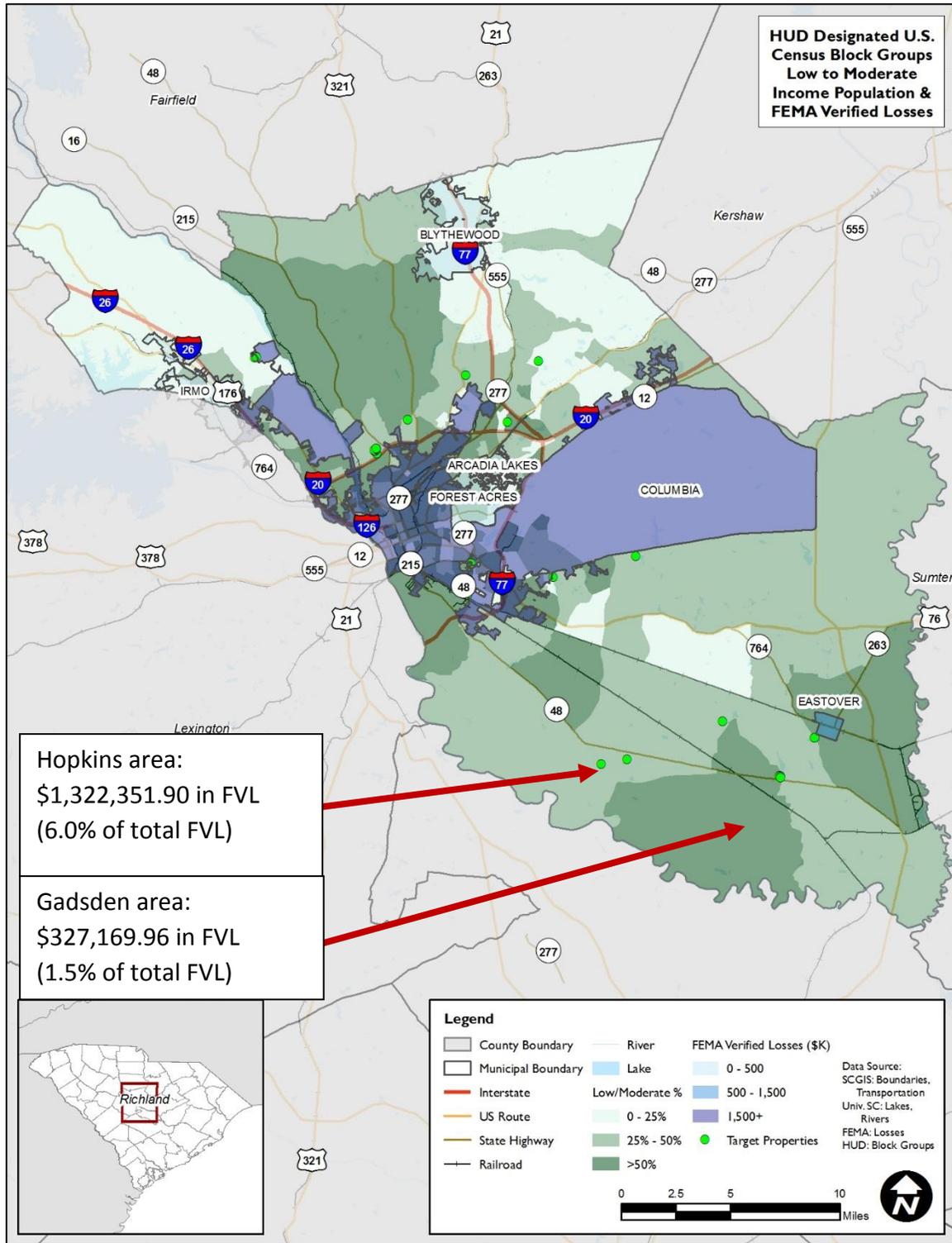
FY 2016 Income Limit Area	Median Income Explanation	FY 2016 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Richland County	\$64,100	Very Low (50%) Income Limits (\$) Explanation	22,450	25,650	28,850	32,050	34,650	37,200	39,750	42,350
		Extremely Low Income Limits (\$)* Explanation	13,500	16,020	20,160	24,300	28,440	32,580	36,730	40,890
		Low (80%) Income Limits (\$) Explanation	35,950	41,050	46,200	51,300	55,450	59,550	63,650	67,750

Following a major disaster, households who qualify as either low or moderate income are likely to have increased difficulty securing financing for necessary repairs, replacing damaged personal property, finding suitable rental housing, or paying for temporary housing or relocation expenses. As such, Richland County has worked to identify impacted areas with concentrations of Low and Moderate income households in order to prioritize assistance for those with greatest need.

Figure 3 below illustrates concentrations of LMI households in the County with associated damage estimates provided by FEMA. It is evident that significant housing damages occurred in areas with concentrations of LMI residents. In addition, through public outreach efforts, Richland County has determined that many residents did not apply for FEMA assistance who live in areas with high concentrations of LMI households. As such, these individuals are not captured through the available data or mapping. Richland County will continue to identify residents of greatest need, including those with limited financial resources, and prioritize these homes for assistance through the CDBG-DR program.



Figure 3 - HUD Designated U.S. Census Block Groups Low to Moderate Income Population & FEMA Verified Losses





Additional information related to impacts to Low and Moderate income households is provided by a review of the damage assessments for structures in the SFHA. According to this assessment, 38.1% (162 homes) of all homes damaged in the floodplain were within areas with greater than 51% LMI households. Of the damaged structures in these areas, 132 were Single Family homes and 30 were multi-family homes. Damage to structures in these areas of concentrated LMI households totaled \$21,172,964.93, which accounts for 67% of the total damages to homes in the SFHA. Importantly, the percentage of total damage in the SFHA that occurred in LMI areas (67%) is disproportionate to the percentage of homes damaged in the SFHA that were in LMI areas (38.1%). This indicates that not only were many homes in predominantly LMI areas damaged, but they also underwent more extensive damages than those in other areas. As a result, these households with pre-existing financial difficulties are likely to have the greatest pressing need for assistance.

2.6.3 Baseline Housing Conditions and Housing Types Impacted

The 2014 ACS reported a total of 167,017 housing units in Richland County, of which 87.7% are occupied, resulting in a vacancy rate of 12.3%. Of these units, 85,553 (58.4%) are owner-occupied and 60,905 (41.6%) are renter-occupied.

The majority of housing units in the County are 1-unit detached structures (64.6%), with the remainder divided between multi-family structures (28.0%), mobile homes (4.8%), and 1-unit attached structures (2.6%). The median value of homes in Richland County was estimated to be \$149,200 in 2014. Table 6 provides a breakdown of housing types for Richland County compared to the State of South Carolina. These figures assist in estimating the types of housing most likely to have been damaged during the disaster.

Table 6 - Housing Units by Type

Housing Type	Richland		South Carolina	
	Housing Units	Percent (%)	Housing Units	Percent (%)
1-unit, detached	107,876	64.60%	1,362,445	62.3%
1-unit, attached	4,282	2.60%	68,995	3.2%
2 units	4,426	2.70%	53,590	2.4%
3 or 4 units	8,391	5.00%	64,136	2.9%
5 to 9 units	11,753	7.00%	98,041	4.5%
10 to 19 units	8,173	4.90%	77,295	3.5%
20 or more units	14,056	8.40%	100,088	4.6%
Mobile home	7,984	4.80%	362,634	16.6%
Boat, RV, van	76	0.00%	1,034	0.0%
Totals	167,017	100%	2,188,258	100%

Source: 2014 American Community Survey

The majority of the housing stock in Richland County is relatively modern with approximately 70% built after 1970. The decade of largest housing construction occurred between 2000 and 2009, with 38,218 units making up 22.9% of the County’s housing stock. The County experienced relatively steady housing construction between 1960 and 1999, with each decade making up a similar percentage of the total housing stock. Table 7 below provides a summary of housing stock age in Richland County compared to the State of South Carolina.



Table 7 - Housing Units by Year Built

Year	Richland		South Carolina	
	Housing Units	Percent (%)	Housing Units	Percent (%)
Built 2010 or later	7,317	4.40%	62,099	2.8%
Built 2000 to 2009	38,218	22.90%	446,564	20.4%
Built 1990 to 1999	23,253	13.90%	427,477	19.5%
Built 1980 to 1989	22,158	13.30%	377,469	17.2%
Built 1970 to 1979	25,755	15.40%	346,117	15.8%
Built 1960 to 1969	21,392	12.80%	209,394	9.6%
Built 1950 to 1959	14,035	8.40%	152,937	7.0%
Built 1940 to 1949	7,060	4.20%	69,546	3.2%
Built 1939 or earlier	7,829	4.70%	96,655	4.4%
Total	167,017	100%	2,188,258	100%

Source: 2014 American Community Survey

Single family vs. multi-family vs. mobile

The flood event impacted homeowners, renters, and mobile home residents. Due to the prevalence of 1-unit detached single family homes, which make up approximately 64% of the County’s housing stock, it is estimated that of the 10,016 homes with FEMA verified damages, 6,470 are 1-unit detached single family homes. In addition, of the 425 homes in the floodplain that were damaged, 365 (85.9%) were single family homes, which further suggests that most home damage in the County is likely to have occurred to single family homes.

The County has determined that multi-family structures were also damaged. Of the 425 homes in the floodplain that were damaged, 60 (14.1%) were multi-family structures totaling nearly \$10 million in estimated damages.

Mobile home owners were also impacted by the storm, as evidenced by the 892 mobile homes that registered with FEMA and received a damage estimate. In addition, nearly 8,000 mobile homes are present throughout the County. Because many residents did not register with FEMA, additional mobile homes are likely in need of assistance.

Owner vs. Renter

FEMA registrations provide insight into the proportions of each occupancy type that were affected. Of the 10,016 homes with FEMA verified damages, 8,744 (87.3%) were owner occupied and 1,269 (12.7%) were renter occupied. According to these figures, the vast majority of damaged homes are likely owner occupied. However, as discussed previously, these figures account only for homes registered for FEMA assistance, and do not accurately represent the full universe of damaged homes.

Based on the 41.6% of housing units in the County that are renter-occupied, it is likely that the true number of renter occupied homes that were damaged exceeds the 1,269 renters who received a damage estimate from FEMA. Additional renter needs are expected because only 1,501 of the 6,622 renters who registered for FEMA’s IHP actually received assistance. In addition, some of the 60 multi-family units damaged in the floodplain were likely owner-occupied condominiums, but it is also likely that some of these units were renter occupied, thus representing additional potential unmet needs.



LMI households may face major challenges saving enough money for a down payment or being approved for a mortgage. According to Richland County's 2012-2016 CDBG Consolidated Plan, the County had need for additional affordable rental housing prior to the severe storm and flood events of 2015. When combined with this pre-existing shortage of affordable rental housing, damages to the County's rental stock likely placed additional strain on low and moderate income residents looking for safe and affordable rental housing.

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

The Columbia Housing Authority (CHA) is a local public agency created by State legislation in 1934 to provide quality housing for low and moderate income families in the City of Columbia. The CHA expanded service to residents of unincorporated areas of Richland County in 1981. The CHA owns and maintains more than 2,000 units of conventional public housing, which are available to families of low and moderate incomes. Most of the properties are located near bus lines, schools, churches, and shopping facilities. CHA's housing inventory is constantly changing and includes a wide array of housing types—small and large multi-family complexes, duplexes, and single-family homes. Most of the single family homes are located throughout the unincorporated areas of Richland County. The 107 employees of the Authority provide the day-to-day operational support for 2,074 public housing households throughout the City and over 3,000 Section 8 participants living in private accommodations. Working with the CHA, it was determined that 26 public and HUD-assisted housing units were damaged during the severe storms and flooding of October 2015.

Demand for public housing in Richland County continues to outpace the supply of public housing units. As of July 2012, Richland County's 2012-2016 CDBG Consolidated Plan indicated that 6,019 families were on the waiting list for CHA public housing. There are 2,542 Section 8 voucher applicants on the waiting list. This number of applicants translates to a two- to three-year wait. Figures from 2012 indicate that more than 96% of the households on the CHA combined waiting list for both Section 8 and public housing are African-American, 9.9% are headed by an elderly person, and 58.6% include children.

Richland County Community Development staff work closely with organizations that serve the needs of homeless populations through existing programs and housing facilities. The County and City of Columbia have a number of programs that provide shelter and assistance to the homeless and at-risk populations, many of which are vital resources in response to natural hazard-related impacts. There are several programs and projects under way to provide additional supportive housing, prevent homelessness, address emergency shelter needs and develop transitional housing and supportive programs for transitional housing. As a partner in the Midlands Area Consortium for the Homeless (MACH), Richland County addresses the concerns of the continuum of care, which involves emergency shelter, transitional housing and programs to assist in the areas of permanent housing and independent living. Richland County will continue addressing the needs of the homeless by providing assistance and referrals to local area homeless agencies and housing facilities including:

- Family Shelter
- Hannah House
- Transitions
- Oliver Gospel Mission
- The Women's Shelter
- Palmetto Place Children's Shelter

As indicated in section 2.5, the County's low and extremely low income populations are at the highest risk for homelessness. In addition to ongoing support for existing housing for the homeless, the County's CDBG-DR



housing programs outlined in this Action Plan are designed to prioritize low and moderate income applicants in order to prevent homelessness.

2.6.4 Housing Unmet Need Calculation

HUD defines unmet housing needs as the number of housing units with unmet needs times the estimated cost to repair those units, less repair funds already provided. As a result of extensive community outreach and review of available data, Richland County has estimated that a minimum of 4,000 homes remain in need of repair representing approximately **\$187,468,240 in unmet homeowner needs**. In addition, it is estimated that 2,052 renters are likely to be in need of assistance, representing an unmet need of **\$6,643,627**.

Occupancy	Damage/Need	Assistance Received/Anticipated	Unmet Need
Homeowners	\$259,980,800	\$72,512,560.06	\$187,468,239.94
Renters	\$10,969,992	\$4,326,365	\$ 6,643,627
Public Housing	\$256,000	\$256,000	\$ 0.00
Totals	\$271,206,792	\$77,094,925.06	\$194,111,866.94

County officials recognized early in the process of identifying unmet needs that available FEMA, SBA, and NFIP data each provided an important, but limited, perspective on damages and potential unmet needs. A key finding of this planning process was that large numbers of impacted residents with remaining housing needs are not captured by the available data. Many either did not register for FEMA assistance, registered but were denied assistance, or received insufficient assistance to fully repair their homes. Others have experienced delayed damages due to prolonged soil and home saturation that occurred after the deadline for FEMA registration. In addition, it is clear from NFIP data that thousands of homes damaged were not covered by flood insurance. Unfortunately, detailed SBA data were not available during the development of this Action Plan, and only aggregated total loan amounts were available.

Filling these gaps in the available data is a significant challenge. To help identify as many residents as possible with remaining recovery needs, County officials conducted direct outreach to residents registered for FEMA assistance. Without sufficient time or resources to contact all 13,506 homeowners who applied for assistance, the County determined that the most accurate method for estimating the number of homes with remaining needs was to utilize a sufficient sample size and then extrapolate the needs of the larger population.

Homeowner Calculation

As of July, 2016, Richland County officials had been able to contact 404 households on the list of FEMA IHP applicants to inquire about remaining housing damages and needs. Of the 404 households contacted, 159 (39.36%) indicated remaining damages and rebuild needs. To determine the total number of homes with remaining rebuild needs, the estimated 39.36% of FEMA applicants with remaining needs was applied to the total 13,506 registered homeowners to extrapolate an estimate of 5,315 homes with rebuild needs. These figures, however, included homes located within the boundaries of the City of Columbia, which should be removed due to the City receiving a separate allocation of CDBG-DR funds. Because the City of Columbia received a separate allocation, Richland County believes that the greatest impact with the Richland County allocation can be achieved by serving Richland County residents, excluding City of Columbia.



The County determined that of the 5,315 homes with rebuild needs, an estimated 1,130 are located within the City of Columbia, leaving a total of 4,185 homeowners in Richland County, outside the City of Columbia, with remaining rebuild needs. To account for the many homeowners whose homes were damaged during the flood but did not register with FEMA, Richland County has increased this figure by 10% for a total of **4,604 homes with estimated rebuild needs**. Based on the damage assessment conducted for all structures in the SFHA, it is estimated that **365 of these homes are in the floodplain and 4,239 are outside of the floodplain**.

SBA damage assessments and loans are often used to estimate rebuild costs for the purposes of calculating unmet needs. However, as detailed SBA loan information was not available during the development of this Action Plan, Richland County has calculated an average rebuild cost using information from local contractors. This was determined to be the most accurate method due to the limitations of available data from damage assessments, as well as the contractor's knowledge of actual labor and material costs in the County.

To account for the unique conditions of homes located in the SFHA, Richland County estimated a rebuild cost of **\$71,200** for homes located inside the SFHA and **\$55,200** for homes located outside of the SFHA. The additional expense for rehabilitation inside the floodplain is based on the assumption that these homes will be elevated above the Base Flood Elevation (BFE). These estimates are based on the following estimated costs:

- General - \$2,700
- Interior Rough Finish - \$31,400 (insulation, drywall, interior trim, cabinets, painting)
- Interior Finish - \$13,700 (flooring, bath accessories, shelving, mirrors, door hardware, appliances, cleaning)
- Exterior Finish - \$6,000 (siding, deck)
- Site work - \$1,400
- Elevation (floodplain only) - \$16,000.

Utilizing the above figures, the total rebuild cost is estimated to be \$259,980,800. The total rebuild cost for homes outside of the floodplain is estimated at \$233,992,800 based upon an average rebuild estimate of \$55,200 applied to the estimate of 4,239 homes. The total rebuild estimate for homes inside of the floodplain is estimated at \$25,988,000 based upon an average rebuild estimate of \$71,200 applied to the estimate of 365 homes.

These rebuild estimates, however, represent recovery costs prior to traditional assistance from FEMA, NFIP, SBA, and others. To account for assistance already received, **\$72,512,560.06 in homeowner assistance was subtracted from the total need of \$259,980,800 to estimate a total unmet homeowner need of \$187,468,239.94**.

Renter Calculation

To determine potential unmet needs for renters the total number of rental applicants (6,622) was multiplied by the estimated percentage with remaining needs (39.36%) to determine an estimate of 2,606 total renters in the County with remaining needs. This figure includes renters residing in the City of Columbia, however, and similar to the homeowner calculation, these should be subtracted from the total. Richland County estimates that approximately 554 reside in the City of Columbia, leaving a total of **2,052 renters** in the County, outside of the City of Columbia, with remaining needs. Importantly, many more renters may have remaining needs, as evidenced by the 5,121 renters registered with FEMA who did not receive assistance.



Assuming rental assistance may be needed for up to 6 months, and utilizing the median rent for the County of \$891 per month (2014 ACS), the estimated need for rental assistance is \$10,969,992 (\$891/month x 6 months x 2052 renters). These rental estimates represent the recovery costs prior to traditional assistance from FEMA and others. **After subtracting the \$4,326,365 in rental assistance provided through FEMA's IHP program, the total unmet rental need was determined to be \$6,643,627.**

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

During the development of this Action Plan, Richland County collaborated with CHA to determine any remaining recovery needs of public housing and HUD-assisted housing. Working with the CHA, it was determined that 26 public and HUD-assisted housing units were damaged during the severe storms and flooding of October 2015. As a result of these damages, residents were forced to relocate to local shelters for approximately 2 to 3 weeks. Utilizing \$256,000 in funding from the State Insurance Reserve Fund, the Housing Authority was able to mobilize quickly and repair all but two of the impacted units. According to the Housing Authority, one of the remaining two units is scheduled to be repaired using the proceeds of pending flood insurance claims. The other unit with remaining damages has been identified for buyout through a pending Hazard Mitigation Grant Program (HMGP) application submitted by Richland County. Additional impacts to Public Housing property included damage to parking lots, hazardous material remediation needs, damage to a retaining wall, and sediment accumulation. The Housing Authority has pending requests for assistance from FEMA to meet these needs.

Based on information provided by the CHA, current funds are sufficient to make all necessary repairs to their impacted housing units. Richland County will continue working with the Housing Authority to confirm the status of pending funding requests. Should additional needs be identified, CDBG-DR assistance may be made available through an amendment to this Action Plan.

While funding has been secured to make necessary repairs to CHA managed properties, need is critical in Richland County for additional affordable housing and homeless prevention assistance. In discussions with the CHA, Richland County confirmed that many residents are having significant difficulty finding affordable rental units in the aftermath of the severe storms and flooding. CHA indicated that they have had to extend voucher deadlines on numerous occasions as a result of recipients being unable to find adequate housing. Richland County will continue to focus on the needs of LMI residents, and will prioritize assistance for these residents through the housing programs outlined in this Action Plan.

As described in Section 2.5, Richland County has pre-existing challenges related to homelessness and homeless prevention. The severe damage to housing stock from the storms of October 2015 create additional challenges for currently homeless populations and those at-risk of homelessness. Richland County will not be assisting homelessness directly through CDBG-DR funding. Due to limited resources and results of the unmet needs assessment, Richland County is prioritizing housing resources for the rehabilitation of single family homes and small rental properties as outlined in Section 3.4. Richland County will continue to address homeless needs in the County through support for existing homeless programs and homeless housing facilities. Additional information on these pre-existing homeless assistance programs is provided in Section 4.4

2.7 Public Infrastructure and Facilities

This section describes Richland County's identified public infrastructure and facility impacts and the methodology for calculating the total unmet need of **\$46,132,611.50**.



Recovery Area	Damage/Need	Assistance Received/Anticipated	Unmet Need
Infrastructure	\$52,800,594.43	\$6,667,982.93	\$46,132,611.50

2.7.1 Public Infrastructure and Facility Impacts

Public infrastructure and facilities in Richland County were severely impacted by the October 2015 flooding. The flooding event caused stream/river flooding, and overland flooding that resulted in blockage/loss of county infrastructure at over 300 different sites, isolating emergency services, community services, and residences. Roads and bridges were eroded, rutted, and washed out due to flooding rendering them impassable for emergency and public access. Approximately 50 roads were closed due to damage, 19 private dams failed, and 267 roads underwent varying levels of damage from flood waters and erosion. The historical flooding resulted in closure of 36 state roads, over half of which (19) were located in Richland County. Initial damages included \$2.7 million in damages to County roads and approximately \$175,000 in damages to County facilities. Additional capital improvement needs totaled approximately \$400,000.

In addition to the costs of repairs, the County also incurred the costs of conducting necessary emergency response and recovery efforts. These services included provision of shelter for 247 individuals and distribution of 1,364 pallets of water and 39,000 meals for impacted residents. Additional response and subsequent recovery efforts included emergency services, infrastructure and utility repairs, and debris removal, among others. In total, these recovery activities resulted in more than \$15 million in costs to Richland County. The cost of additional emergency protective measures provided by departments such as local police, public works, and the Emergency Services Department totaled over \$1.5 million. The flooding from Hurricane Joaquin also resulted in school and business closings, which placed substantial strain on local resources and services. In addition, flooding and damage to infrastructure severely inhibited travel and limited access to several parts of the County while approximately 30,000 people lost power across the State.

Following the severe flood events, Richland County conducted several key assessments of transportation, storm water, and public service facilities, to identify deficiencies exposed during the 2015 flood, as well as opportunities for investments to improve resilience and better mitigate damages to public and private property during future events. Through post-storm hydraulic analysis and recovery planning, Richland County identified numerous infrastructure recovery and resilience needs including improvements for undersized culverts and drainage features. These assessments resulted in a series of priority projects including channel and detention area improvements, culvert upgrades, bridge improvements, and expanded public facilities. In total, these needs were estimated at approximately \$48.8 million.

2.7.2 Infrastructure Unmet Need Calculation

Due to the extreme impacts of this event, Richland County remains in great need of recovery and rebuilding assistance to address unmet infrastructure and facility needs. While County departments, with support from numerous organizations and volunteers, were successful in addressing many urgent and critical needs during the immediate aftermath of the disaster, substantial need remains. The estimated unmet infrastructure need is based upon FEMA Public Assistance project worksheets, HMGP project applications, and County-department-led assessments and capital improvement planning. **The total estimated need in the County of \$46,132,611.50 consists of the local 25% match for pending HMGP infrastructure projects plus an estimated \$45,243,236 in identified public infrastructure and facility resilience projects.**



Table 8 - Public Infrastructure and Facility Unmet Needs

Public Infrastructure or Facility	Total Need	Assistance Received/Anticipated	Unmet Need
Local match for HMGP projects	\$7,557,358.43	\$6,667,982.93	\$889,375.50
Retrofit five (5) County owned detention ponds	\$1,000,000.00	\$0.00	\$1,000,000.00
Assessment and rehab of County storm drainage infrastructure	\$3,500,000.00	\$0.00	\$3,500,000.00
Inspect, design, and rehab two (2) existing County owned bridges	\$1,000,000.00	\$0.00	\$1,000,000.00
Mapping and assessment of localized flooding areas (outside SFHA)	\$2,250,000.00	\$0.00	\$2,250,000.00
Water Quality units into existing storm drainage system	\$400,000.00	\$0.00	\$400,000.00
New Stormwater Management office and facilities	\$1,050,000.00	\$0.00	\$1,050,000.00
Construction of new Emergency Operations Center	\$36,043,236.00	\$0.00	\$36,043,236.00
Totals			\$46,132,611.50

2.8 Economic Development

The total unmet economic need is estimated to be approximately **\$11,690,405.37**. This figure is derived by subtracting a total available assistance of \$24,523,554.13 from the total estimated impacts of \$36,213,959.50.

Recovery Area	Damage/Need	Assistance Received/Anticipated	Unmet Need
Economic Development	\$36,213,959.50	\$24,523,554.13	\$11,690,405.37

The estimate of economic unmet needs is based upon several key data sources including SBA loans, agricultural insurance data, pending HMGP applications, and public and stakeholder outreach. According to the best available data, numerous commercial structures were damaged throughout the County and were unable to operate for weeks, months, or longer. Some businesses experienced direct damages, and others were impacted by damaged infrastructure preventing access by employees and customers. As less recovery assistance is typically available for businesses than homes, many businesses were slow to recover, which resulted in lost jobs and tax revenues, and commercial vacancies.

The severe extent of flooding resulted in impacts on many types of businesses both inside and outside of the floodplain. According to information provided by the SBA, approximately \$27.6 million in damages occurred to businesses in Richland County. Further estimates of damages are provided by the SFHA Damage Assessment, which found that 52 non-residential structures in the floodplain underwent damages totaling approximately \$13.2 million. Of these 52 non-residential structures, 20 were located within areas that have high concentrations of LMI households representing a total damage of \$9,019,568.08. Damaged businesses in



these areas may represent additional recovery challenges, as business owners in these areas may be less able to secure recovery assistance.

However, these figures do not capture the total economic impact because the SBA figures only include those who applied for loans, and the SFHA damage estimates do not include businesses outside of the floodplain. Additional economic impacts were assessed through the HMGP planning process, which identified 15 commercial structures for voluntary buyout.

In addition to direct damages to commercial structures, many residents lost their jobs either temporarily or permanently as a result of the disaster. A review of Disaster Unemployment Assistance for Richland County reveals that \$82,869 has been paid to date to Richland County residents. While this confirms that jobs were indeed lost due to the storm, it is difficult to determine the true impact or remaining need for unemployment, as not all those affected applied for or received Disaster Unemployment assistance. Richland County will continue collecting and evaluating the best available data to further refine this assessment.

Richland County’s agricultural industries were also affected by the storm event. According to agricultural insurance data, a total of \$4,813,047 in insurance proceeds and deductibles has been provided to date. In addition, the State of South Carolina has announced the availability of \$40 million in assistance to help address agricultural impacts throughout the State. Based on the best available data, it is assumed that all of the County’s agricultural needs will be met through these two sources of assistance. However, Richland County will re-evaluate this need as the recovery process continues and will consider whether additional need can be met with the existing CDBG-DR allocation. If the need is identified and funds are available, this Action Plan may be amended to address that need.

Table 9 provides a breakdown of the top industries in Richland County. Based on this information it is expected that the majority of damages to for-profit businesses occurred in the retail and arts, entertainment, recreation, and accommodation and food services industries.

Table 9 - Top Industries by Employment in Richland County

Industry	Employment	Percent (%)
Agriculture, forestry, fishing and hunting, and mining	1,406	0.70%
Construction	7,425	3.90%
Manufacturing	11,570	6.10%
Wholesale trade	5,119	2.70%
Retail trade	23,462	12.30%
Transportation and warehousing, and utilities	7,628	4.00%
Information	4,846	2.50%
Finance and insurance, and real estate and rental and leasing	14,405	7.50%
Professional, scientific, and management, and administrative and waste management services	18,512	9.70%
Educational services, and health care and social assistance	49,430	25.90%
Arts, entertainment, recreation, and accommodation and food services	20,157	10.50%



Industry	Employment	Percent (%)
Other services, except public administration	9,588	5.00%
Public administration	17,541	9.20%
Total	191,089	100%

Source: 2014 American Community Survey

2.8.1 Public and Stakeholder Engagement

Direct outreach to impacted residents and business owners was at the core of Richland County’s unmet need assessment. Where available, the County placed the highest importance on information gathered from the public through public meetings, stakeholder meetings, and direct outreach. Richland County gathered and analyzed large quantities of data used to help shape the priorities in this plan; however, the County believed it most important to verify quantitative and statistical data with direct feedback from the public. To gather this information, the County employed a variety of outreach methods including public meetings, stakeholder meetings, direct outreach to FEMA registrants, and collaboration with VOADs and other non-profit groups, among others. Input from these efforts directly impacted the calculations of unmet needs and the County’s strategic allocations of CDBG-DR funding.

Public Meetings Summary

Richland County conducted 10 public outreach meetings between June 29 and July 14, 2016. During these meetings, the County presented an overview of the CDBG-DR program and provided attendees with information regarding eligible uses of funding, projected timelines, and the Action Plan process. Most importantly, the majority of time during each meeting was set aside as an open forum to gather feedback from the public on a variety of topics including damages and impacts from the storm, remaining needs, and ideas for potential programs and projects, among others. This format also allowed impacted residents to ask questions about the CDBG-DR program and to better understand how it may be able to provide them assistance. During these meetings, Richland County also invited case managers from the Hearts and Hands organization to connect residents in need with additional resources.

Comment forms were collected from each public meeting and carefully reviewed by County staff to determine the breadth of specific needs of residents and to aggregate feedback into categories. Through this process the County received 114 total responses grouped into the following categories of requests or needs:

Housing (rehab, rebuild, buyout, rental assistance)	93 (48.7%)
Infrastructure (roads, bridges, drainage)	44 (23%)
Economic Development (business rehab, loans, working capital)	15 (7.9%)
Emergency Service (police, Emergency Medical Services [EMS], sheltering)	6 (3.1%)
Public Facilities	3 (1.6%)
Planning (studies, assessments, plans)	1 (<1%)
Public outreach	1 (<1%)
Other	5 (4%)

Table 10 lists the schedule of public meetings conducted during the development of this Action Plan.



Table 10 - CDBG-DR Public Meeting Schedule

Wednesday, June 29	Thursday, June 30	Tuesday, July 12	Wednesday, July 13	Thursday, July 14
Trenholm Park 3900 Covenant Rd Columbia, SC 29204	North Springs Park Community Center 1320 Clemson Rd Columbia, SC 29229	Richland County Sheriff Department Region 1 Substation 2615 Lower Richland Blvd. Columbia, SC 29061	Eastover Park 1031 Main St Eastover, SC 29044	Richland County Administration Building 2020 Hampton St Columbia, SC 29204
Ballentine Community Center 1009 Bickley Rd, Irmo, SC 29063	St. Andrews Park 920 Beatty Rd, Columbia, SC 29210	Crane Creek Gymnasium 7405-B Fairfield Rd, Columbia, SC 29203	Parklane Road Adult Activity Center 7494 Parklane Rd, Columbia, SC 29223	Gadsden Park Community Center 1668 S. Goodwin Circle, Gadsden, SC 29052

Stakeholder Engagement Summary

In addition to public meetings, Richland County also conducted meetings with key stakeholders groups that represented a cross-section of the entities in the County. The purpose of these interviews was to continue gathering as much information as possible to help identify recovery needs, and to discuss current efforts and potential recovery programs and projects. Between July 18 and July 22, County officials conducted four meetings with representatives of non-profit organizations, civil organizations, school districts, minority organizations, and social services, among many others. The complete meeting schedule is as follows:

- **July 18th** – Voluntary Organizations Active in Disasters
 - United Way of the Midlands – 1800 Main St, Columbia, SC 29201
- **July 19th** – Civil Organizations, Non-Profits, Richland District 1, 2, and Lexington/Richland District 5 schools
 - Greater Columbia Community Relations Council – 930 Richland St, Columbia, SC 29201
- **July 22nd** – MACH/Homeless Agencies/Veterans
 - Columbia Housing Authority – Cecil Tillis Center - 2111 Simpkins Ln, Columbia, SC 29204
- **July 22nd** - Richland County Business Community
 - Council Chambers – Combined Business Webinar and Live Audience – 2020 Hampton Street-Columbia, SC 29204 – 2nd Floor, Administration Building.

2.9 Summary of Completed and Ongoing Recovery Efforts

This section summarizes completed and ongoing recovery efforts during and following the severe storms and flooding of October 2015. These efforts include recovery work conducted by Richland County, federal and state organizations, and non-profit and other local organizations.

2.9.1 Completed and Ongoing Recovery Efforts



In the wake of extreme public safety risks and damages in October 2015, the County has worked in partnership with numerous organizations to begin addressing recovery needs throughout the County. These substantial efforts have included emergency response, sheltering, setup and management of a recovery operations center, provision of essential household goods and supplies, debris management, infrastructure repair, housing assistance, and private well disinfection, among many others.

Dedicated and effective emergency response, including activation of the County Emergency Operations Center (EOC), led to an immediate and coordinated effort to address the diversity of needs arising from the severe storm event and associated flooding. In response to this storm event Richland County's EOC was fully activated on October 4th and did not formally cease recovery functions until October 19th. During the first week of the storm event, the EOC focused on rescue and evacuation efforts, and provision of emergency sheltering services for impacted residents. The EOC also provided additional services to the citizens of Richland County including provision of food and water, traffic management, debris clearing, and aerial reconnaissance of dams, among others.

The severe storms resulted in flood inundation and damage to businesses and homes, as well as flood and erosion damage to infrastructure, natural resources, public facilities, and other structures. By October 9th, the County was conducting inspections of damaged infrastructure and utility assets, and beginning preliminary road restoration activities to restore mobility and functionality within the County. Following the extensive damage to public and private roads and bridges, Richland County Department of Public Works (DPW) recognized the urgency of the situation and implemented a strategy to conduct as many repairs as possible. By working extended hours and weekends, DPW managed to repair 249 County-maintained roads. The United States National Guard subsequently completed repairs on 15 additional roads.

As emergency response transitioned to short-term recovery, requests for sheltering, food, and water began to decline. However, other requests for well testing, road and private infrastructure restorations, and housing assistance began to surge. Over the following weeks and months, Richland County continued to maximize all available resources to address immediate public health and safety needs of residents while planning for and managing the transition from short-term recovery to intermediate and long-term recovery and resilience. Richland County DPW received 260 repair requests for private roads and driveways from residents throughout the County, and completed all of these requested repairs in accordance with the County's Emergency Private Road Maintenance Ordinance.

The heavy rain and flood waters also resulted in contamination of hundreds of private wells. During the recovery effort, Richland County completed disinfection services at 362 private wells containing Coliform/E. Coli contamination.



SECTION 3. RECOVERY PROGRAMS AND PROJECTS

3.1 Recovery Goals

The community's overarching hazard mitigation goals provide the foundation for identifying and implementing appropriate recovery programs. The series of goals presented in this Action Plan have been developed to reflect community values, existing conditions, identified damages, and vulnerabilities. Richland County established the following goals to guide development of the CDBG-DR Action Plan:

- **Goal:** Address the unique recovery needs and challenges of all residents of Richland County so that no one "falls through the cracks."
- **Goal:** Provide safe housing for all residents.
- **Goal:** Achieve a comprehensive understanding of the root causes of flooding in Richland County.
- **Goal:** Position the County to better prepare for, respond to, and minimize impacts of future flood events.
- **Goal:** Ensure continuity of operations and the provision of essential services before, during, and after a disaster or hazardous event.
- **Goal:** Provide tailored solutions that are most appropriate for urban, rural, and all areas of the County.
- **Goal:** Achieve post-flood economic revitalization and long-term economic health.
- **Goal:** Address restoration of critical infrastructure. This includes schools but is not limited to schools.
- **Goal:** Ensure the Action Plan goals are consistent with other adopted planning documents.
- **Goal:** Provide accountability through financial oversight.

3.2 Basis for Funding Allocations

This section describes how the findings of the unmet needs assessment informed development of recovery programs and the allocations of funding. Richland County's initial analysis indicates unmet need in all three core recovery categories of housing, infrastructure, and economic development. Through this analysis, Richland County determined that the largest recovery need is for housing assistance followed by infrastructure and then economic development. Richland County will also allocate funding for program administration and planning.

The need for single family housing rehabilitation was identified as the largest category of unmet needs in the County. To reflect these findings, this initial Action Plan allocates the largest portion of funding to assist impacted homeowners and renters through single family owner-occupied housing rehabilitation, small rental housing rehabilitation, and voluntary buyout. In this initial Action Plan Richland County has not allocated funding for multi-family housing through its CDBG-DR programs due to the extensive need of single-family homes, which far outweighs the available funding. In particular, the prevalence of 1-4 unit single family homes (70% of the County's housing stock), and the fact that 85.9% of damaged homes in the floodplain were single family homes, Richland County has determined a need to focus its limited CDBG-DR housing resources towards assistance for these types of homes. In addition, the County's proposed housing programs were prioritized for their ability to best address the County's pre-existing affordable housing shortage.

While the largest unmet needs identified were for housing assistance, the County recognizes the importance of holistic recovery and has also allocated CDBG-DR funding to address the identified needs for public infrastructure and facility improvements, as well as assistance for impacted local businesses. Richland County



believes that focusing recovery efforts too strongly in only one area would neglect the interconnected nature of the community. For example, failing to address necessary infrastructure repairs or implement resilience improvements can lead to even greater housing and economic damages during future storms. Likewise, failing to address post-disaster economic recovery needs can have significant lasting impacts on residents' ability to find employment, buy and maintain safe homes, and pay for essential goods and services. In addition, an impaired economy can lead to substantial tax losses and hinder provision of necessary public services. To help address these needs, Richland County has allocated funding to support both public infrastructure projects and business assistance.

Richland County has also allocated funding for Program Administration and Resiliency Planning which are eligible activities as defined by 24 CFR 570.206 and 24CFR 570.205 respectively. Program administration may fund the necessary costs of setting up and managing the CDBG-DR recovery programs including, but not limited to, pre-award program development activities, general program oversight, compliance monitoring, performance tracking, management of the Disaster Recovery Grant Reporting system, production of quarterly reports, as well as general administration. Funding allocated for Resiliency Planning will be available to fund studies, analyses and additional planning efforts that either support the design and implementation of CDBG-DR programs and/or establish additional recovery and resilience strategies, plans and initiatives. Resilience planning activities may also include reimbursement for otherwise allowable costs of recovery plans and studies that were incurred on or after the incident date of the covered disaster.

Pre-award and Pre-agreement Cost Reimbursement

The County intends to seek reimbursement for the costs of eligible pre-award and pre-agreement activities. These tasks were conducted in anticipation of the award and in preparation for standing up multiple disaster recovery programs. These costs will be split appropriately between program administration costs, planning and activity delivery costs. Richland County will be seeking reimbursement for the following pre-award and pre-agreement activities:

- Intermediate Recovery Plan: \$36,000
- CDBG-DR Action Plan Development: : \$78,157.90
- Risk Analysis Developmpent: \$69,733.00
- CDBG-DR Action Plan Translation services: \$10,469.62
- Disaster Recovery Grant Reporting Training: \$1,032.27
- CDBG-DR Program Design: \$4,000.00
- Environmental Reviews: \$3,670.00
- CDBG-DR Program Setup and Administration: \$200,000

CDBG-DR Budget Summary

Richland County intends to utilize CDBG-DR funding to support multiple recovery programs that will complement one another and lead to greater community-wide recovery and future resilience. Table 11 below summarizes the proposed allocation of CDBG-DR funding for Richland County to address the unmet needs described in Section 2.



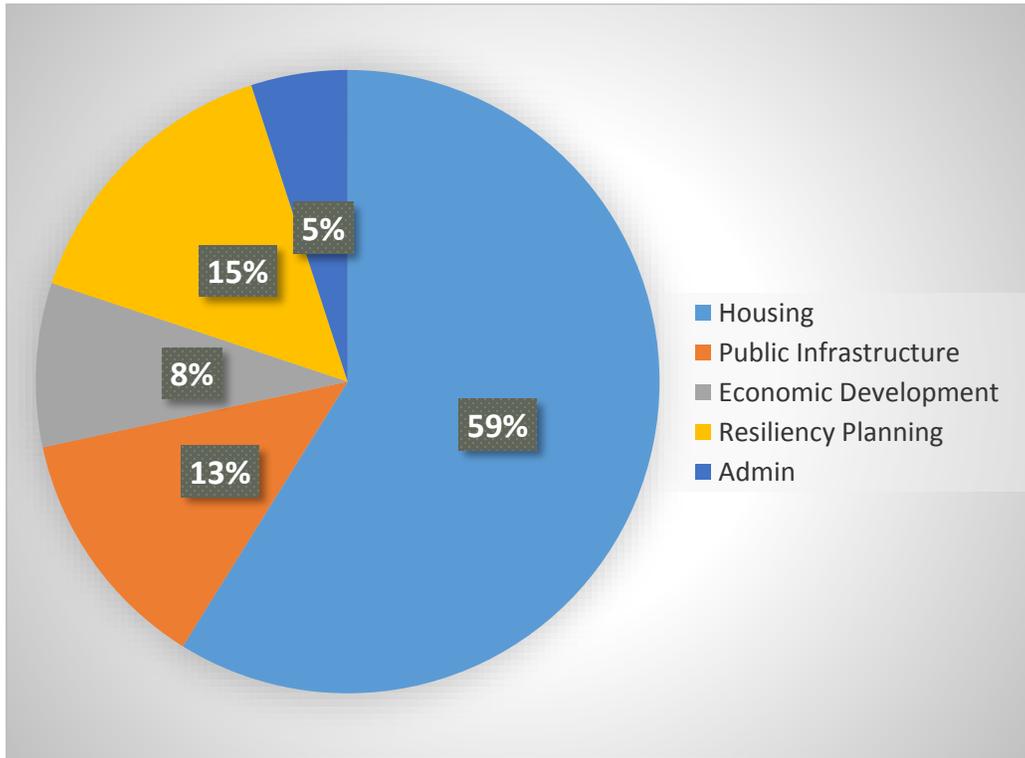
Table 11 - CDBG-DR Budget Summary

Use of Funds	Allocation	Expenditure Schedule			
		2017	2018	2019	2020
Housing Activities	\$13,841,000	\$5,452,400.00	\$7,780,550.00	\$304,025.00	\$304,025.00
Single Family Housing Rehabilitation	\$10,161,000	-	-	-	
Rental Rehabilitation	\$2,000,000	-	-	-	
HMGP Residential Buyout Match	\$1,680,000	-	-	-	
Public Infrastructure	\$3,000,000	\$477,875.10	\$1,966,593.68	\$277,765.62	\$277,765.62
HMGP Local Match	\$889,375.50	-	-	-	
Public Infrastructure Resiliency	\$2,110,624.50	-	-	-	
Economic Development	\$2,000,000	\$541,341.91	\$1,247,113.97	\$105,772.07	\$105,772.07
HMGP Commercial Buyout Match	\$942,279.37	-	-	-	
Business Assistance	\$1,057,720.63	-	-	-	
Recovery and Resiliency Planning	\$3,500,000	\$700,000.00	\$2,100,000.00	\$350,000.00	\$350,000.00
Recovery and Resiliency Planning	\$3,500,000	-	-	-	
Administration	\$1,175,000	\$377,183.20	\$688,677.89	\$54,569.46	\$54,569.46
CDBG-DR Program Administration	\$1,175,000	-	-	-	
Total	\$23,516,000	\$7,548,800.21	\$13,782,935.53	\$1,092,132.15	\$1,092,132.15

Figure 4 below summarizes the CDBG-DR budget by percentage.



Figure 4 CDBG-DR Budget Summary by Percentage



3.3 National Objectives

Section 101(c) of the authorizing statute sets forth the primary objective of the program as the development of viable communities by the provision of decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate incomes. The statute further states in Section 104(b)(3) that this is to be achieved in the CDBG program by ensuring that each funded activity meets one of the following three named national objectives:

- Benefiting Low- and Moderate-Income Persons
- Preventing or Eliminating Slums or Blight
- Meeting Urgent Needs.

The statute also states that each grant recipient must ensure that at least seventy (70) percent of its expenditures over a particular time period must be used for activities qualifying under the first of those national objectives (Benefiting Low- and Moderate-Income Persons.)

For each CDBG-DR funded activity that is meeting the Urgent Need National Objective, Richland County will assess the type, scale, and location of the disaster-related impacts that the activity is addressing. In this way, Richland County will ensure that each activity meeting the Urgent Need National Objective is responding directly to an identified disaster-related impact.

There are currently no program activities planned to address Slum and Blight. However, some of the primary activities of buyout and rehabilitation of homes and businesses may have a secondary benefit of addressing slum and blight.



Richland County’s CDBG-DR funded recovery programs will be implemented in accordance with these requirements. Richland County has developed these programs with the intent to prioritize activities that will benefit populations with greatest need. In particular, Richland County will ensure that, at minimum, 70% of the total CDBG-DR funds will directly benefit Low and Moderate Income households.

3.4 Housing Programs

Richland County communities and residents are still in the recovery process after suffering the impacts of the severe storms and flooding that occurred in October 2015. The primary focus of Richland County’s CDBG-DR Disaster Recovery Programs is to provide relief for those people most impacted by the storms and flooding. As described in Section 2, single family housing assistance for both homeowners and renters was identified as being the greatest unmet need in Richland County. To reflect these unmet needs, assistance will be provided through three housing recovery programs including homeowner rehabilitation, small rental rehabilitation, and voluntary property buyout.

Richland County has established three objectives for the housing programs. The primary objective of the CDBG-DR housing programs is to provide decent, safe, and sanitary housing in the storm and flood-impacted areas through the provision of activities designed to mitigate storm damage that occurred as a result of the October 2015 weather events. Additionally, Richland County seeks to ensure that the housing needs of low, very low, and extremely low-income households are assisted with housing. A third objective is to prioritize provision of decent, safe, and sanitary housing for LMI, elderly (age 62 or older), and disabled populations.

Housing Program Expenditure Schedule			
Time Period	Single Family Housing Rehabilitation Program	Rental Rehabilitation Program	HMGP Residential Buyout Local Match
Q1 2017	\$101,610	\$20,000	\$0
Q2 2017	\$406,440	\$80,000	\$0
Q3 2017	\$1,016,100	\$200,000	\$168,000
Q4 2017	\$2,540,250	\$500,000	\$420,000
Q1 2018	\$2,540,250	\$500,000	\$420,000
Q2 2018	\$1,524,150	\$300,000	\$420,000
Q3 2018	\$1,016,100	\$200,000	\$168,000
Q4 2018	\$508,050	\$100,000	\$84,000
Q1 2019	\$63,506.5	\$12,500	\$0
Q2 2019	\$63,506.5	\$12,500	\$0
Q3 2019	\$63,506.5	\$12,500	\$0
Q4 2019	\$63,506.5	\$12,500	\$0
Q1 2020	\$63,506.5	\$12,500	\$0
Q2 2020	\$63,506.5	\$12,500	\$0
Q3 2020	\$63,506.5	\$12,500	\$0
Q4 2020	\$63,506.5	\$12,500	\$0
Total	\$10,161,000	\$2,000,000	\$1,680,000



3.4.1 Single Family Homeowner Rehabilitation Program

Program Description

The Single Family Homeowner Rehabilitation Program (SFHRP) will provide housing assistance to homeowners who were impacted by the severe storms and flooding that occurred in October 2015. This program will focus on repair or rehabilitation of single family housing units in the disaster-impacted areas to applicable construction codes and standards. This program may also include replacing an existing substandard manufactured housing unit (MHU) with a new or standard MHU. Modular homes are also eligible structure types. Rehabilitation may be offered to applicants based on the extent of damage to the home. Replacement of MHUs and modular housing will be limited to situations where local zoning/building permits or federal requirements such as environmental regulations will allow replacement of the original, storm-damaged home. Understanding that it may be necessary for applicants to remove themselves and their belongings from their homes during the period of repair, Richland County Department of Community Development (RCCD) will consider relocation assistance on a case-by-case basis.

This Program does not pay for like for like replacement. The Program will offer standard, basic amenities to make a home decent, safe and sanitary and all improvements will be assessed for compliance with HUD Section 8 Existing Housing Quality Standards, and local building codes. Luxury items, including but not limited to, granite (or other high-end) countertops, high-end appliances, stone flooring, garage door openers, security systems, swimming pools, fences, and television satellite dishes are not eligible under the SFHRP.

Where replacement of a MHU or modular home are indicated, standard floor plan options will be offered. If a replacement home is provided, the original MHU or modular home must be demolished and removed from the site prior to the replacement of that structure.

Additional improvement parameters include:

- Lead-based paint mitigation or stabilization, as needed.
- Mold remediation, as needed.
- Accessibility features for documented special needs.
- Standard appliances limited to refrigerator, stove/oven, but will only be considered when repair would not be cost effective.
- Ventilation and energy efficiency items such as ceiling fans, window screens, and screen doors may be replaced if damage is reasonably attributable to storm damage.
- Elevation above the base flood elevation level where the rehabilitation will constitute a substantial improvement in a Special Flood Hazard Area (SFHA).
- All electrical components must be inspected including service, meter, wiring, and fixtures even if no electrical work is being specified. Unsafe components must be replaced. All exposed wiring, switches, and light bulbs in living areas must be encased.
- All homes must be equipped with a smoke detector installed in conformity with code requirements.
- Rehabilitated homes inhabited by special needs or elderly (age 62 or older) persons must be analyzed as to the special physical needs of such persons. Improvements such as widened doorways, ramps, level entry and doorways, and grab bars in bath areas must be installed, if appropriate.



Hearing and sight impaired adaptations should also be considered. All special needs requirements must be documented prior to approval.

Program Budget

The total program budget for the SFHRP is **\$10,161,000**. This allocation may be increased or decreased based on the demand for the Program with amendment to the Action Plan and approval by the Richland County Council and HUD.

Connection to the Disaster and Long-Term Recovery

The provision of safe, disaster-resistant housing for impacted residents is at the core of Richland County's long-term recovery strategy. Based on the best available data, Richland County has determined that single family owner-occupied homes were the most impacted housing stock in the County. This program will assist in repairing homes that were directly impacted by the federally declared disaster. Home repairs and improvements funded through this program will be designed to help minimize the impacts of future storm and flood events. By addressing the most pressing unmet housing needs resulting from the disaster and encouraging high-quality, disaster-resistant construction, Richland County will improve the long-term safety and stability of its communities. In addition, making necessary repairs and stabilizing damaged neighborhoods will also create additional long-term recovery benefits including retention of consumers for local businesses, preservation of the local tax base, and encouragement of new investment.

CDBG Eligibility and National Objective:

Rehabilitation of residential structures through the SFHRP is an eligible activity under the CDBG program as described in 24 CFR 570.202. All housing activities for the SFHRP will meet the National Objectives requirement under the authorizing statute of the CDBG program. Activities under the SFHRP are anticipated to primarily meet either the LMI or the Urgent Need objective. The national objective to be fulfilled through this program will be specific to each home and based on verification of each applicant's household income.

Geographic Area:

Damaged homes must be located in Richland County, excluding properties within the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All applicants to the SFHRP must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for an applicant to be eligible for assistance. Eligibility does not assure assistance and it is expected that there will be more eligible applicants than can be served with available funds. Threshold requirements are those that upon their face will either allow an applicant to continue to move forward in the program or result in disqualification. All applicants to the SFHRP must meet the following minimum requirements:

- The home must have been damaged by the storms and/or flooding of October 2015 and must have unrepaired damage as of the date of application. Applicants need not have registered for FEMA individual assistance to be eligible for SFHRP. For those who were registered, the SFHRP may use FEMA damage information for informational purposes, but the SFHRP damage verification process will constitute the official documentation of damage linking back to the October 2015 storm or flooding damage. If an applicant did not register, Richland County will verify by third party that the home was damaged using the same damage verification process. If there are no documents proving



damage, Richland County will conduct on-site inspections to determine if the property was damaged by the storm.

- Damaged property must be located within Richland County (excluding City of Columbia).
- Applicant must provide proof of ownership at the time the disaster damage occurred and have maintained ownership.
- Damaged structure must be the applicant's principal place of residence.
- Applicant must be current on property taxes or current on an approved payment plan (including exemptions under current law).
- Applicant must be current on any child or spousal support obligation.
- Applicant must agree to occupy the home as his/her primary residence after project completion for a period of at least 5 years.
- For properties located in the SFHA, applicant must maintain insurance coverage (not less than contract amount), inclusive of casualty (hazard) and flood insurance.
- For properties located outside of the SFHA, applicant must maintain hazard insurance coverage not less than the contract amount.
- The SFHRP assistance will be in the form of a five year zero-interest deferred forgivable loan. For each year, post award, that the applicant remains in compliance with the terms of the program one fifth (1/5) of the loan balance will be forgiven. If the applicant remains in compliance for the entire five year period, the entire balance will be forgiven and the applicant will owe nothing. If the applicant violates the terms of the loan, the un-forgiven balance of the loan will be owed back to the program.
- Property must be an eligible structure under the SFHRP. Eligible structures for the SFHRP include single unit, single family stick-built dwelling units, mobile home units (MHU), and modular housing units. Attached structures are eligible if they are under the common roof of the damaged single structure. Improvements must be physically attached to the house and be permanent. MHUs and modular housing will only be eligible for replacement and will not be eligible for rehabilitation.
- Homes used for both residential and commercial purposes are eligible for the program; however, the portion of the home that is residential is the only portion that may be rehabilitated. The applicant must provide his/her most recent tax return to determine the percent of the property that is used for commercial purposes. Damages to the commercial portion of the home will not be repaired.
- Garages, sheds, and outbuildings not attached to the main dwelling unit are not eligible for repair.
- No condominiums, co-operatives, townhomes, or other housing units that share any common wall or area will be eligible under the SFHRP.
- Recreational Vehicles and camper trailers used as a residence are not eligible for the program. Houseboats used as a residence are not eligible for the program.
- Vacation or second homes are not eligible for the SFHRP.

Prioritization:

Applicants applying for disaster assistance will be processed according to priorities based on the criteria outlined below. Richland County has created a two-tiered priority system in which LMI applicants are prioritized over non-LMI applicants. The LMI qualified households will be funded at a minimum level of 70% of total available funds (excluding planning and administration funds). Within the Priority 1 LMI group, additional factors are considered to prioritize sub-groups, allowing the program to serve any LMI individual in order to confer benefits to eligible applicants in the most efficient manner possible.

An LMI individual with a compounding factor will be allowed to move up the line for more expedient consideration. The sub-priorities are characterized by: disaggregated LMI demographic groups, elderly or disabled individuals in the household, single parent households, households with children under age 5, military



veteran households, households existing in unlivable or unsafe conditions, and mobile homes. An applicant has to meet only one of the sub-priority characteristics to be classified in each of the three sub-priorities. The intent is to incorporate both the family and dwelling characteristics of applicants in order to establish a system that gives the households that are less able to address need without public assistance a higher priority.

Grant Size Limits:

The following grant size limits are established for the SFHRP:

- Single family owner-occupied detached housing unit: Up to \$70,000. If there are accessibility and/or relocation needs for a home, Richland County will consider up to an additional \$10,000 for accessibility improvements and up to an additional \$5,000 for relocation assistance on a case-by-case basis
- Mobile housing unit replacement: Up to \$60,000. If there are accessibility and/or relocation needs for a home, Richland County will consider up to an additional \$10,000 for accessibility improvements and up to an additional \$5,000 for relocation assistance on a case-by-case basis
- Modular housing unit replacement: Up to \$90,000. If there are accessibility and/or relocation needs for a home, Richland County will consider up to an additional \$10,000 for accessibility improvements and up to an additional \$5,000 for relocation assistance on a case-by-case basis

Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting rehabilitation of approximately 145 homes through the SFHRP.

3.4.2 Small Rental Rehabilitation Program

Program Description:

The Small Rental Housing Rehabilitation Program (SRRP) will provide assistance to rehabilitate rental housing impacted by the severe storms and flooding of October 2015. This program will focus on the repair or rehabilitation of small (1-4 units) rental housing in the disaster-impacted areas to applicable construction codes and standards. Eligible activities under this program will include rehabilitation and associated elevation (if required) and demolition. RCCD may also provide assistance for Individual Mitigation Measures (energy efficiency and storm mitigation activities) on a case-by-case basis.

The following objectives are provided for the implementation and administration of a successful Rental Program.



- The primary objective of this Program is to provide decent, safe, and sanitary housing in the storm and flooding impacted areas through the provision of activities designed to mitigate storm damage that occurred as a result of the storms, as well as any future disasters.
- A second objective is to ensure that the housing needs of low, very low and extremely low-income households are assisted with housing.
- Prioritize the rehabilitation of units that will serve the elderly and/or disabled population.

The program is designed as a 5-year, zero interest forgivable loan program for small rental property owners serving the low to moderate income market. One-fifth (1/5) of the loan will be forgiven each year on the contract signing anniversary as long as the landlord owner remains in compliance with program rules. Failure to maintain compliance will result in the acceleration of the loan and repayment of the remaining balance.

All rehabilitated rental units must be restricted during the affordability period of five years for low to moderate income (LMI) persons. The rents, at a minimum, must comply with High HOME Investment Partnership (HOME) rents. Property owners will ask tenants to self-certify that their annual household incomes match the rent requirements of the rental units. Owners will be required to affirm that they have received the tenant's income certification and will submit a certification report to RCCD. This will be a required annual process for the duration of the 5-year affordability period. Property owners will screen and select their own tenants, but must comply with requirements of the Fair Housing Act (42 U.S.C. 3601-3620), which prohibits discrimination based on race, color, religion, sex, national origin, familial status, and disability. Additional funds may be made available, above the base rehabilitation caps described below, to address accessibility for disabled tenants.

Program Budget:

The total program budget for the SRRP is **\$2,000,000**. This allocation may be increased or decreased based on demand for the Program with amendment to the Action Plan and approval by the Richland County Council and HUD.

Connection to the Disaster and Long-Term Recovery

The provision of safe, disaster-resistant housing for impacted residents is at the core of Richland County's long-term recovery strategy. Based on the best available data, Richland County has determined that rental housing stock underwent significant damage during the October 2015 severe storm and flood events. Shortage in affordable rental stock already had preceded the October 2015 storm, and thus many residents have struggled to find safe and affordable homes in the wake of the disaster. This program will assist in repairing small rental units directly impacted by the federally declared disaster. By repairing critically needed rental units and encouraging high-quality, disaster-resistant construction, Richland County will improve the long-term safety and stability of its communities. In particular, ensuring that a percentage of each rehabilitated rental unit will be affordable to LMI residents, Richland County will help to address the shortage of affordable units while also assisting in prevention of homelessness. Providing safe housing for residents of all income levels is essential to long-term community health and resilience.

CDBG Eligibility and National Objective:

Rehabilitation of residential structures through the SRRP is an eligible activity under the CDBG-DR program as described in 24 CFR 570.202. All housing activities for the SRRP will meet the National Objectives requirement under the authorizing statute of the CDBG program. Activities under the SRRP will meet the LMI National Objective.



Geographic Area:

Damaged rental units must be located in Richland County, excluding properties within the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All applicants to the SRRP must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for a rental property to be eligible for assistance. Eligibility does not assure assistance, and more eligible applicants are expected than can be served with available funds. Threshold requirements are those that upon their face will either allow an applicant to continue to move forward in the program or result in disqualification.

Structures eligible for assistance through this program are single family structures as defined by HUD and the Federal Housing Administration (FHA) and must contain between one and four units. To be an eligible structure, the entire structure (therefore all units in the structure) must be owned by the same owner(s). The rehabilitation cap applies to the entire structure and will not be increased on a per unit basis. All units (100%) must be LMI units, unless one unit in the structure is owner-occupied (non-LMI) and the owner remains in that unit. If a non-LMI owner occupant vacates the unit in which they live, that unit must be rented to LMI tenants. Condominiums, townhomes, mobile homes, recreational vehicles and boats are not eligible structure types under this program. Rent to own, bond for deed and lease to own properties are not eligible. All applicants to the SRRP must meet the following minimum requirements:

- The property must not be in bankruptcy
- The property taxes must be current on the property.
- Title must be clear with no liens or judgments.
- Modular housing structures are eligible. A modular home is built in sections at a factory, transported to the building site on truck beds, and then joined together by local contractors. Modular homes are built to conform to all state, local or regional building codes at their destinations.
- All properties must be located within the jurisdiction of Richland County and outside of the limits of the City of Columbia.
- Properties may be rehabilitated only.
- Properties must have basic amenities of an oven, stovetop and refrigerator.
- Upon completion, the single family homes must meet Housing Quality Standards (or current standards), local Richland County building code requirements, and benefit low-moderate income persons earning 80% or less of Area Median Income as defined by HUD and detailed in the Housing and Community Development Act of 1974 (HCDA) Title I, 105(a).
- Units are not required to have been rental stock prior to application for assistance, however must be rented to certified LMI households if awarded repair funds.
- Housing units located where federal assistance is not permitted by federal regulation or within runway clear zones of either a civil or military airport are not eligible.
- Property owner must provide matching funding equal to 25% of total project costs. The matching portion is capped at 25% of the base rehabilitation amount, excluding accessibility costs.
- If there are accessibility and/or relocation needs for one or more tenants, property owner will provide up to \$10,000 for accessibility improvements and up to an additional \$5,000 for relocation assistance. All costs paid by the property owner for accessibility improvements will count towards the required 25% owner match, however any funds paid for relocation will not count toward the 25% owner match.



- Proof of landlord owner's attempts to secure traditional funding sources, such as loans through banks, as well as SBA loans, to assist recovery of rental properties will be required

Prioritization:

Priority for this program will be given to landlords who designate units for either Special Needs or elderly tenants.

Prioritization will be given to projects which provide the greatest benefit to:

- Expand the affordable housing stock with priority given to vacant units in a condition that is not suitable for occupancy.
- Encourage housing for the elderly and disabled; priority is given to projects with dedicated units for elderly and disabled tenants.

Grant Size Limits:

The award amount provided to each property owner, under the Small Rental Rehabilitation Program, will depend upon the amount of storm damage and the cost of rehabilitation up to the maximum allowable award amount. When a rental unit is assisted with disaster recovery funds, the entire unit must be brought up to Housing Quality Standards (HQS) or the current federal standards. Eligible costs include hard costs for construction and soft costs associated with repair of rental units plus other costs permissible under 24 CFR 570. Awards are limited to one grant per property owner. The maximum possible award is \$85,000 as indicated below:

- Per structure rehabilitation cap: \$70,000
- Accessibility cap: \$10,000
- Relocation assistance: \$5,000

Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting rehabilitation of approximately 28 rental homes through the SRRP.

3.4.3 HMGP Residential Buyout Local Match

Program Description:

This program will support the voluntary buyout of 63 homes located in the SFHA that were impacted by the severe storms and flooding of October 2015. Specifically, this program will provide funding for the required 25% local share match of pending HMGP applications.



Program Budget:

The total program budget for this program is **\$1,680,000**. This allocation may be increased or decreased based on the outcome of pending funding applications with an amendment to the Action Plan and approval by the Richland County Council and HUD.

Relation the Disaster and Long-Term Recovery

Proper land use management is essential to any long-term recovery strategy. Through the identification and buyout of properties that underwent substantial damage during the October 2015 severe storm and flood events, Richland County will establish a safer and more sustainable development pattern. This program not only responds directly to the significant damage to these homes from the flood but also protects these properties from future damage and creates opportunities for open space. Open spaces adjacent to waterways have numerous benefits for long-term flood recovery and resilience, including flood storage, reduced stormwater runoff velocity, removal of pollutants, and protection of streambanks, among others.

CDBG Eligibility and National Objective:

The buyout of real property is an eligible activity under the CDBG-DR program as described in 24 CFR 570.201(a). Payment of the non-federal share or local match for a federal grant is also an eligible activity under the CDBG-DR program as described in 24 CFR 570.201(g). All activities supported by this program will meet the National Objectives requirement under the authorizing statute of the CDBG program. Activities under the buyout program are anticipated to primarily meet either the LMI or Urgent Need objective. The national objective to be fulfilled through this program will be specific to each home and based on verification of each applicant's household income.

Geographic Area:

Homes targeted for voluntary buyout are all located in Richland County, outside the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All applicants to this program must meet certain eligibility standards to qualify for assistance. For this program, eligible properties include those eligible for and awaiting receipt of HMGP funding. Each property must also meet the requirements the following requirements:

- The home must have been substantially damaged (>50% damaged) by the storms and/or flooding of October 2015, and must have unrepaired damage as of the date of application.
- Damaged property must located within Richland County (excluding City of Columbia).
- Applicant must provide proof of ownership at the time the disaster damage occurred and have maintained ownership.
- Damaged structure must be the applicant's principal place of residence.
- Applicant must be current on property taxes or current on an approved payment plan (including exemptions under current law).
- Applicant must be current on any child or spousal support obligation.



Prioritization:

Applications for assistance will not be accepted for this program. Homes assisted through this program are those with pre-existing applications for HMGP assistance. As such, there are no prioritization criteria for this program.

Grant Size Limits:

Assistance is limited to 25% of the cost of buyout, less any duplication of benefits.

Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting voluntary buyout of 63 homes through this program.

3.5 Infrastructure Programs

As described in more detail in Section 2, Richland County public infrastructure and facilities underwent a variety of damages during the October 2015 severe storms and flooding. In the wake of the disaster, County officials identified numerous roads, bridges, culverts, and stormwater drainage systems that were damaged. Damage to these critical systems created public safety risks, hindered emergency services, isolated neighborhoods, and prevented access to essential services for residents. In addition, through post-disaster analysis, Richland County has identified a series of resilience improvements that will improve public infrastructure and facilities to better withstand future floods and minimize property damage and losses to public services. Richland County has identified a need to provide funding to address these needs through both support with matching fund requirements for other public assistance and through support for infrastructure improvements.

Public Infrastructure Expenditure Schedule		
Time Period	HMGP Local Match Program	Public Infrastructure Resiliency Program
Q1 2017	\$0	\$0
Q2 2017	\$0	\$0
Q3 2017	\$88,937.55	\$105,531.23
Q4 2017	\$177,875.10	\$105,531.23
Q1 2018	\$177,875.10	\$211,062.45
Q2 2018	\$177,875.10	\$527,656.13
Q3 2018	\$88,937.55	\$527,656.13
Q4 2018	\$44,468.78	\$211,062.45
Q1 2019	\$22,234.39	\$105,531.23



Q2 2019	\$22,234.39	\$52,765.61
Q3 2019	\$11,117.19	\$26,382.81
Q4 2019	\$11,117.19	\$26,382.81
Q1 2020	\$22,234.39	\$105,531.23
Q2 2020	\$22,234.39	\$52,765.61
Q3 2020	\$11,117.19	\$26,382.81
Q4 2020	\$11,117.19	\$26,382.81
Total	\$889,375.50	\$2,110,624.50

3.5.1 HMGP Local Share Match Program

Program Description:

This program will provide funding for the required 25% local share match for public infrastructure projects with pending HMGP applications. Local match funding will be provided by CDBG-DR to support repairs and resilience upgrades to a series of culverts, stormwater detention areas, and drainage systems. By leveraging the pending HMGP assistance, Richland County will maximize the recovery benefits of these limited resources. A complete list of projects for which local share match will be provided is as follows:

Project Name	Project Description	25% Local Match
Culvert Resilience Improvements	Richland County conducted an extensive study of the culverts in the County and identified nine culverts that need to be increased in size to mitigate similar damages from future flooding incidents.	\$150,039.75
Danbury Drive Stabilization	Increase capacity of the regional detention pond to handle the flows in the neighborhood.	\$63,717.50
Spring Valley Little Jackson Creek Stream Mitigation, Stream Restoration Regenerative Stormwater Conveyance	Stabilize and improve the railroad ditch line using regenerative stormwater conveyance to mitigate localized flooding.	\$375,000.00
Eastover Stormwater Drainage Channel Improvement	This project will mitigate flooding, improve drainage, and help control mosquito population in six "Carolina bays" and along Solomon Street in the Town of Eastover.	\$67,794.00
Lower Richland County Stormwater Drainage Channel Improvement	This project will mitigate flooding, improve drainage, and help control mosquito population in three areas of chronic flooding.	\$45,772.00
Piney Grove Wynn Way Detention Pond	Create a stormwater dry detention basin for the Stoop Creek watershed.	\$68,394.25
Brookgreen Court Detention Pond	Create stormwater dry detention best management practices (BMP) for the Stoop Creek watershed.	\$118,658.00



Program Budget:

The total program budget for this activity is **\$889,375.50**. This allocation may be increased or decreased based on the outcome of pending funding applications with an amendment to the Action Plan and approval by the Richland County Council and HUD.

Relation to Impacts of the Disaster and Long-Term Recovery (connect to unmet needs assessment)

Support for public infrastructure projects will address immediate needs and support Richland County's long-term recovery strategy by helping to ensure provision of necessary services to residents and businesses. The importance of these services for the health and stability of Richland County is paramount. Fully functioning and protected public infrastructure before, during, and after a flood improves safety, mobility, and quality of life for residents and businesses, and promotes long-term health of the County.

CDBG Eligibility and National Objective:

Assistance with the required local share of federal recovery programs is an eligible activity under the CDBG-DR Program as described in 24 CFR 570.201 (g). Payment of the non-federal share or local match for a federal grant is also an eligible activity under the CDBG-DR program as described in 24 CFR 570.201(g). All activities funded through this program will meet the National Objectives requirement under the authorizing statute of the CDBG Program. Activities under this program are anticipated to primarily meet either the LMI or Urgent Need objective. The specific national objective to be fulfilled through this program will be project-specific. As infrastructure typically has area-wide benefits, the beneficiaries from each individual project will determine the national objective. In many cases, populations to be served by necessary infrastructure improvements will meet the LMI criteria and will thus address that objective. In other cases, however, damage to public infrastructure causing loss or decreased performance of critical and necessary services to local homes and businesses has created an urgent need

Geographic Area:

This program will support public infrastructure located within Richland County, outside the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All activities funded through this program must meet certain eligibility standards to qualify for assistance.

For this program, eligible projects include public infrastructure projects eligible for and awaiting approval of HMGP funding. Each project must also meet the following requirements:

- Project must be located within Richland County (excluding City of Columbia).
- Project must clearly demonstrate a connection to direct or indirect impacts of the federally declared disaster.
- Project must be CDBG eligible.
- Project must address an identified need that has not been met through other funding sources.

Grant Size Limits:

Assistance will be limited to 25% of the total project cost, less any duplication of benefits.



Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting completion of 7 projects through this program.

3.5.2 Public Infrastructure Resilience Program

Program Description:

As part of its long-term recovery strategy, Richland County will implement identified resilience improvements to public infrastructure and facilities that will reduce impacts of future storms on public safety and property damage. To accomplish this, CDBG-DR funds will be used to fund one or more projects identified in Section 2.7.

Program Budget:

The total program budget for this activity is **\$2,110,624.50**. This allocation may be increased or decreased with an amendment to the Action Plan and approval by the Richland County Council and HUD.

Relation to Impacts of the Disaster and Long-Term Recovery (connect to unmet needs assessment)

Support for public infrastructure projects will address immediate needs and support Richland County's long-term recovery strategy by helping to ensure provision of necessary services to residents and businesses. The importance of these services for the health and stability of Richland County is paramount. Fully functioning and protected public infrastructure before, during, and after a flood improves safety, mobility, and quality of life for residents and businesses, and promotes long-term health of the County.

CDBG Eligibility and National Objective:

Assistance for public facilities and improvements is an eligible activity under the CDBG-DR Program as described in 24 CFR 570.201 (c). All activities funded through this program will meet the National Objectives requirement under the authorizing statute of the CDBG Program. Activities under this program are anticipated to primarily meet either the LMI or Urgent Need objective. The specific national objective to be fulfilled through this program will be project-specific. As infrastructure typically has area-wide benefits, the beneficiaries from each individual project will determine the national objective. In many cases, populations to be served by necessary infrastructure improvements will meet the LMI criteria and will thus address that objective. In other cases, however, damage to public infrastructure causing the loss or decreased performance of critical and necessary services to local homes and businesses has created an urgent need.



Geographic Area:

This program will support public infrastructure located within Richland County, outside the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All activities funded through this program must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for a project to be eligible for assistance:

- Project must be located in Richland County.
- Project must clearly demonstrate a connection to direct or indirect impacts of the federally declared disaster.
- Project must be CDBG eligible.
- Project must meet one of three national objectives.
- Project must have an identified need that has not been met through FEMA, SBA, insurance, or other funding sources.

Grant Size Limits:

No grant limit is placed on this program. Richland County officials will determine the final allocation of CDBG-DR funding for one or more projects funded under this program. No project or projects will exceed the total budget of this program.

Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting completion of 1-3 public infrastructure projects through this program

3.6 Economic Development Programs

Richland County businesses are still in the recovery process after suffering the impacts of the severe storms and flooding that occurred in October 2015. The primary focus of Richland County's CDBG-DR Disaster Recovery Programs is to provide relief for those people most impacted by the storms and flooding. As described in Section 2, the County's business community suffered a multitude of impacts from the disaster. Businesses not only underwent structural damage, but many were also impacted by road and bridge closures, loss of revenue, loss of inventory, and employment challenges. Almost a year after the flood, many businesses have not re-opened and others are facing significant financial hardship. In addition, the loss of jobs for low and moderate income residents, who already face economic challenges, presents critical economic risks. To reflect these unmet needs, assistance will be provided to impacted businesses to help address remaining damages and implement a variety of operational improvements that will bolster the County's long-term economic future.



Economic Development Expenditure Schedule		
Time Period	Business Assistance Program	HMGP Local Match Program
Q1 2017	\$0	\$0
Q2 2017	\$0	\$0
Q3 2017	\$105,772.06	\$94,227.94
Q4 2017	\$105,772.06	\$235,569.84
Q1 2018	\$158,658.09	\$235,569.84
Q2 2018	\$158,658.09	\$235,569.84
Q3 2018	\$158,658.09	\$94,227.94
Q4 2018	\$158,658.09	\$47,113.97
Q1 2019	\$26,443.02	\$0
Q2 2019	\$26,443.02	\$0
Q3 2019	\$26,443.02	\$0
Q4 2019	\$26,443.02	\$0
Q1 2020	\$26,443.02	\$0
Q2 2020	\$26,443.02	\$0
Q3 2020	\$26,443.02	\$0
Q4 2020	\$26,443.02	\$0
Total	\$1,057,720.63	\$942,279.37

3.6.1 Business Assistance Program

Program Description:

The Business Assistance Program (BAP) will provide assistance to businesses impacted by the severe storms and flooding in October 2015. This program will provide flexible funding that focuses on addressing a diversity of impacts experienced by the County’s business community, and promotes jobs for low and moderate income residents. The primary objective of this program is to provide access to financing for necessary repairs or working capital that will support employment of low and moderate income residents and help to address the unique disaster-related challenges faced by each impacted business. Assistance will be provided as a deferred, zero-interest, forgivable loan that may be used for a variety of eligible activities including rehabilitation of commercial structures, inventory and supplies, and job training among other business needs.

Program Budget:

The total program budget for the BAP is **\$1,057,720.63**. This allocation may be increased or decreased based on the demand for the Program with amendment to the Action Plan and approval by the Richland County Council and HUD.



Connection to the Disaster and Long-Term Recovery

Following a major disaster, businesses often experience significant financial and operational hardships that have far-reaching implications for a community's long-term recovery. When businesses are slow to recover or are unable to re-open, the entire community suffers as jobs are lost, access to essential services is hindered, and tax revenues shrink. Low and moderate income residents may be particularly affected, as they are unlikely to have sufficient savings to sustain them through a period of unemployment. Loss of income for vulnerable populations can lead to increased risk for homelessness among other health and safety issues.

A comprehensive long-term recovery must recognize the inter-connections between a community's housing, infrastructure, and economic sectors, and should include support for business resilience. By providing flexible assistance to Richland County's businesses, these investments will have significant positive impacts throughout the County. Repair of commercial structures with high-quality, disaster-resistant construction returns property to productive use and minimizes damages of future storms. In addition, retention and expansion of jobs provides the necessary income for residents to continue to recover and pay for essential goods and services. Likewise, protection of tax revenues ensures continued support for necessary public infrastructure and services. Supporting business owners who are struggling to recover also expedites a return to economic growth and prosperity that in turn increase job opportunities, local property values, and overall quality of life.

CDBG Eligibility and National Objective:

Rehabilitation of nonresidential structures and assistance to for-profit businesses are eligible activities under the CDBG-DR program as described in 24 CFR 570.203 (b). Activities, have been selected using the "Guidelines for evaluating and selecting economic development projects" found at 24 CFR 570.209. All business assistance provided through the BAP will meet the National Objectives requirement under the authorizing statute of the CDBG program. Activities under the SFHRP will meet the LMI Need objective.

Geographic Area:

Businesses must be located in Richland County, excluding properties within the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All applicants to the BAP must meet certain eligibility standards to qualify for assistance. The following threshold requirements must be met for an applicant to be eligible for assistance. Eligibility does not assure assistance, and more eligible applicants are expected than can be served with available funds. Threshold requirements are those that will either allow an applicant to continue to move forward in the program or result in disqualification. All applicants to the BAP must meet the following minimum requirements:

- The business must have been damaged and/or financially or operationally impacted by the storms and/or flooding of October 2015, and must have an identified need that has not been met through other funding sources. Richland County will conduct on-site inspections and individual discussions with applicants to verify direct impacts to each business as a result of the October 2015 severe storms and flooding.
- Business must be located within Richland County (excluding City of Columbia).
- Applicant must provide proof of ownership at the time the disaster damage occurred and have maintained ownership.



- Applicant must be current on property taxes or current on an approved payment plan (including exemptions under current law).
- Applicant must be current on any child or spousal support obligation.
- Businesses will be required to comply with annual reporting requirements
- Eligible structures for the BAP include commercial buildings.
- National chains or franchises are not eligible
- Businesses must certify that a minimum of 51% of their employees will qualify as LMI according to HUD's established income limits for a period of 5 years

Prioritization:

Applicants applying for disaster assistance are processed according to priorities based on the prioritization criteria outlined in the program guidelines. However, businesses that employ more than 51% LMI individuals will be prioritized over businesses meeting the minimum 51% requirement.

Grant Size Limits:

The following grant size limits are established for the BAP: forgivable loan up to \$75,000.

Within the maximum loan amount of \$75,000 the following forgiveness schedule will be followed:

- Loans up to \$15,000: amortized for 1 year with the full balance forgiven upon proof of program compliance one year after loan closing.
- Loans of \$15,001 - \$30,000: amortized over 2 years with 1/2 of the loan amount forgiven upon proof of program compliance each year for two years after loan closing.
- Loans of \$30,001- \$45,000: amortized over 3 years with 1/3 of the loan amount forgiven upon proof of program compliance each year for three years after loan closing.
- Loans of \$45,001 - \$60,000: amortized over 4 years with 1/4 of the loan amount forgiven upon proof of program compliance each year for three years after loan closing.
- Loans of \$60,001- \$75,000: amortized over 5 years with 1/5 of the loan amount forgiven upon proof of program compliance each year for three years after loan closing.

Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting assistance to approximately 14 businesses through the BAP.



3.6.2 HMGP Commercial Buyout Local Match

Program Description:

This program will support the voluntary buyout of up to 15 non-residential structures located in the SFHA that were impacted by the severe storms and flooding of October 2015. Specifically, this program will provide funding for the required 25% local share match of pending HMGP applications.

Program Budget:

The total program budget for this program is **\$942,279.37**. This allocation may be increased or decreased based on the outcome of pending funding applications with an amendment to the Action Plan and approval by the Richland County Council and HUD.

Relation the Disaster and Long-Term Recovery

Proper land use management is essential to any long-term recovery strategy. Through the identification and buyout of properties that underwent substantial damage during the October 2015 severe storm and flood events, Richland County will establish a safer and more sustainable development pattern. This program not only responds directly to the significant damage to these structures from the flood but also protects these properties from future damage and creates opportunities for open space. Open spaces adjacent to waterways have numerous benefits for long-term flood recovery and resilience, including flood storage, reduced stormwater runoff velocity, removal of pollutants, and protection of streambanks, among others.

CDBG Eligibility and National Objective:

The buyout of real property is an eligible activity under the CDBG-DR program as described in 24 CFR 570.203 (a). Payment of the non-federal share or local match for a federal grant is also an eligible activity under the CDBG-DR program as described in 24 CFR 570.201(g). All activities supported by this program will meet the National Objectives requirement under the authorizing statute of the CDBG program. Activities under the SFHRP are anticipated to primarily meet either the LMI or Urgent Need objective. The national objective to be fulfilled through this program will be specific to each home and based on verification of each applicant's household income.

Geographic Area:

Properties targeted for voluntary buyout are all located in Richland County, outside the boundaries of the City of Columbia.

Eligibility Requirements and Threshold Factors:

All applicants to the SFHRP must meet certain eligibility standards to qualify for assistance. For this program, eligible properties include those eligible for and awaiting receipt of HMGP funding. Each property must also meet the requirements:

- The structure must have been substantially damaged (>50% damaged) by the storms and/or flooding of October 2015, and must have unrepaired damage as of the date of application.
- Damaged property must be located within Richland County (excluding City of Columbia).
- Applicant must provide proof of ownership at the time the disaster damage occurred and have maintained ownership.



- Applicant must be current on property taxes or current on an approved payment plan (including exemptions under current law).
- Applicant must be current on any child or spousal support obligation.

Prioritization:

Applications for assistance will not be accepted for this program. Properties assisted through this program are those with pre-existing applications for HMGP assistance. As such, there are no prioritization criteria for this program.

Grant Size Limits:

Assistance is limited to 25% of the cost of buyout, less any duplication of benefits.

Proposed Start/End Dates:

This program is anticipated to begin in January 2017 and be completed by December 2019

Responsible Entity:

RCCD is the administrator of a CDBG-DR Program funded by HUD under Public Law 114-113. RCCD is the agency responsible for administration of disaster funds allocated to housing, economic development, and infrastructure activities. RCCD is administering these programs directly.

Performance Goals:

Richland County is targeting voluntary buyout of 15 non-residential structures through this program.



SECTION 4. RECOVERY COMMITMENTS

4.1 Promotion of Long-Term Recovery Planning

Richland County is committed to both addressing immediate recovery needs and planning for resilience improvements that will provide long-term recovery benefits and mitigate the impacts of future storms. Collectively the completed recovery projects outlined in Section 3 combined with the recovery programs outlined in this Action Plan contribute significantly to the County's overarching strategy for long-term recovery and resilience.

One of the key elements of long-term recovery planning is the identification of underlying public infrastructure vulnerabilities that can increase public safety threats and property damage during a flood. Following the October 2015 floods, Richland County commenced a series of planning efforts to identify opportunities to promote long-term recovery. These efforts included a comprehensive assessment of the County's infrastructure to identify undersized or ineffective systems that may have contributed to increased flood vulnerabilities. The findings of this analysis resulted in the identification of numerous potential projects including drainage improvements, culvert and bridge replacements, public facility upgrades among others. Many undersized culverts identified through this process now have pending applications for the Federal Hazard Mitigation Grant Program (HMGP). Richland County is seeking to leverage multiple sources of funds to accomplish these important projects to instill long term resilience. Additional infrastructure and facility improvements to support long-term recovery were identified with assistance from the County's Department of Public Works and included drainage system expansions, expanded public facilities for emergency operations and stormwater management, as well as additional studies to better understand flood conditions and identify additional long-term improvements.

The County's planning efforts also include strategies for long-term housing and economic recovery and resilience. Using the latest floodplain mapping and hazard information, the County has identified a number of structures in the floodplain that represent public safety hazards and are at-risk for future damage. As a result of these efforts, the County has submitted applications for HMGP assistance to support the voluntary buyout of 63 structures in the floodplain. By strategically removing unsafe uses from the floodplain, Richland County is establishing a safer more sustainable land use pattern. Through the implementation of the proposed CDBG-DR programs, Richland County is also promoting additional long-term recovery through the selective elevation of homes in the floodplain that are undergoing rehabilitation. In addition, all structures rehabilitated through the CDBG-DR program will be constructed with high-quality materials and will have essential systems such as electric, HVAC, etc. elevated above base flood elevations to increase long-term property resilience.

4.2 Leverage of Funds

Richland County fully understands the importance of maximizing the recovery value of limited resources. As illustrated by the substantial unmet needs identified in this Action Plan, the costs to fully recover and become more resilient during future storms far outweighs the available funding. As such, Richland County has made it a priority to leverage multiple sources of funding, where possible, to support the greatest potential recovery and resilience benefits. This includes prioritizing projects in which other Federal, State and local funding sources can be leveraged to allow CDBG-DR funding to pay only a portion of project costs. This strategy will allow Richland County to utilize limited CDBG-DR funding to support a maximum number of programs and



projects. As part of this Action Plan, Richland County is initially prioritizing the use of CDBG-DR funding as local match for several projects with pending HMGP funding requests. These projects include infrastructure improvements, housing buyouts, and non-residential buyouts.

In addition, since the first recovery efforts began, Richland County has pursued and utilized numerous resources to advance critically important recovery projects. These resources are documented in Section 2.3 and include assistance from FEMA, SBA, NFIP as well as numerous non-profits. These resources have contributed to significant recovery achievements and have allowed for the CDBG-DR funds to be used to assist with needs that are not supported by other available sources.

4.3 Protection of People and Property; Construction Standards

Richland County's CDBG-DR programs or activities will be designed to protect people and property from harm through an emphasis on high quality, durability, energy efficiency, a healthy indoor environment, sustainability, and water or mold resistance. The County is committed to enforcing modern building codes and all other applicable codes, standards and ordinances for all CDBG-DR programs or activities.

Richland County will closely monitor each project utilizing CDBG-DR funding to verify that quality materials and standards are being utilized, that all necessary permits and approvals are in place, elevation requirements are met, and that green building standards are being incorporated when possible and cost effective. To improve the protection of Richland County residents and property, site visits will be conducted regularly during construction to verify that the proper materials and construction standards are being applied during the project. Projects will be inspected during these site visits using a detailed checklist to ensure all applicable construction standards are adhered to. This will include elevations above Base Flood Elevations, use of high quality materials as well as adherence to other standards that will increase resident safety and property protection.

4.3.1 Construction Standards

All projects with construction components funded through CDBG-DR funds will use high-quality materials and will meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion. International Residential Code (IRC) 2012 will be adhered to as required and where appropriate. All rehabilitation projects will comply with Housing Quality Standards (HQS) and all applicable local codes and ordinances. All CDBG-assisted housing must meet all applicable State and local housing quality standards and code requirements and if there are no such standards or code requirements, the housing must meet the housing quality standards in 24 CFR §982.401. All deficiencies identified in the final inspection must be corrected before final retainage is released.

All Applications will be required to meet Section 8 Housing Quality Standards detailed under local Construction Standards, as well as the Fair Housing Accessibility Standards and Section 504 of the Rehabilitation Act of 1973. Developments must also meet all local building codes or standards that may apply.

4.3.2 Necessary and Reasonable Costs

Part of the process in the duplication of benefits procedures includes verifying necessary and reasonable costs. This helps ensure that funds are efficiently and effectively utilized. The determination of necessary and reasonable costs will apply to any project or program receiving funding as well as administrative and planning funds. The County will utilize the cost principles described in 2 CFR Part 225 (OMB Circular A-87) to determine



necessity and reasonableness. According to 2 CFR part 225, “A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made.” Richland County will follow these principles and fund only project costs that are deemed necessary and reasonable.

4.3.3 Green Building

In conformance with FR 81, No. 117 (June 17, 2016), substantial rehabilitation, the construction of new housing or replacement housing must include Green Building Standards. Acceptable Green Building Standards include, “an industry-recognized standard that has achieved certification under at least one of the following programs: (i) ENERGY STAR (Certified Homes or Multifamily High Rise); (ii) Enterprise Green Communities; (iii) LEED (NC, Homes, Midrise, Existing Buildings O&M, or Neighborhood Development); (iv) ICC–700 National Green Building Standard; (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite); or (vi) any other equivalent comprehensive green building program, including regional programs such as those operated by the New York State Energy Research and Development Authority or the New Jersey Clean Energy Program” as described in FR 78.

Where funds will be used for the rehabilitation of structures, contractors and sub-grantees will be provided the HUD CPD Green Building Retrofit Checklist and these standards will be incorporated where feasible. Richland County will promote the use of green infrastructure policies, as identified on EPA’s website www.epa.gov/greenbuilding, for any infrastructure project undertaken utilizing CDBG-DR funds.

4.3.4 Elevations in SFHA

For the repair of substantial damage, or substantial improvements to residential structures in flood hazard areas, Richland County will require that the lowest floor is elevated at least 2 feet above the 1 percent annual floodplain. Where necessary this will also include construction of adequate access to the unit. In locations where rehabilitation does not require raising the entire unit above flood stages, the County will ensure the use of construction techniques that protect or elevate critical systems to reduce the potential for flood damage. Critical systems to be elevated or protected will include HVAC, water heaters, and electrical systems (breaker box).

4.3.5 Mitigation Measures

All mitigation measures implemented through a CDBG-DR funded program will be a necessary expense related to the disaster relief, long-term recovery, and restoration of infrastructure, housing, or economic revitalization. This will include detailed assessments of each proposed mitigation measure including elevations of structures in the SFHA and infrastructure and facility resilience improvements, to ensure consistency with this requirement.

4.3.6 Appeals

Richland County will institute both a complaint and an appeals process to address citizen concerns and applicant grievances. The purpose of these procedures is to set forth guidelines for processing appeals from the Grants & Community Development Department as to the resolution of grievances filed by participants in Richland County's housing rehabilitation programs.

Homeowners who are dissatisfied with the quality of rehabilitation work may follow the appeals process outlined below. Any participant (i.e. property owner, occupant, or contractor) may appeal decisions made by the Community Development Office if he/she believes these decisions are egregious or impinge on his/her



rights. A written grievance must be submitted to the Grants & Community Development Director, 2020 Hampton Street, Suite 3063, Columbia, South Carolina 29202.

The appeals process for property owners, occupants, or contractors is as follows:

1. Community Development Staff
2. Housing Advisory Committee
3. Richland County Administration

Level 1: Community Development Staff

After receiving a written complaint every effort will be made to resolve disputes at the staff level. The appropriate staff person will meet with the aggrieved parties and with others who may be involved to resolve disputes fairly and quickly. The staff will respond to written complaints within (30) thirty days. If the grievance is not resolved to the satisfaction of the program participant at the staff level, the aggrieved party can submit a written request for a hearing before the Housing Advisory Committee within (10) ten days from date of the staff response. This request should be sent to the Grants & Community Development Director, 2020 Hampton Street, Columbia, South Carolina 29202.

Level 2: Housing Advisory Committee

The Housing Advisory Committee consists of representatives of Richland County. The Housing Advisory Committee will respond to written appeals within (15) fifteen working days. If the grievance is not resolved to the satisfaction of the program participant at this level, the aggrieved party can submit a written request for a hearing before Richland County Administration within (10) ten days from date of the Housing Advisory Committee response. This request should be sent to the Richland County Administrator, 2020 Hampton Street, Columbia, South Carolina 29202.

Level 3: Richland County Administration

The aggrieved party is entitled to a hearing before the Richland County Administration. This hearing represents the final level of appeal at the local level.

4.3.7 Broadband Infrastructure

Richland County will ensure that any new construction or substantial rehabilitation, as defined by 24 CFR 5.100, of a building with more than four rental units will include installation of broadband infrastructure where feasible. Richland County will document conditions that impact the feasibility of broadband infrastructure installation including but not limited to financial burden, program alteration, or structural limitations.

4.4 Disaster-Resistant Housing for All Income Groups

As detailed in Section 3, this Action Plan proposes the allocation of the majority of CDBG-DR funding to support three housing programs. These programs were designed to reflect the findings of the unmet needs assessment which indicated a need for housing assistance across all demographics, income levels and housing types. As such, the proposed programs aim to assist both affordable housing units and market rate units as well as both owner-occupied and renter-occupied units. Through these programs Richland County will provide assistance for impacted residents with a diversity of economic conditions and housing preferences.



Households of Low and Moderate Income and particularly those who also include children, elderly or the disabled may experience increased challenges during recovery. To assist residents with the greatest potential need, priority for each housing program will be given to applicants who qualify as Low or Moderate Income, as defined by HUD's established income limits for Richland County. Additional priority status will also be given to households with children, elderly, single parents, veterans, and disabilities.

When conducting the Unmet Needs Assessment, Richland County reviewed the best available data to determine areas with concentrations of Low and Moderate income residents, disabilities, and other vulnerabilities that were most impacted by the disaster. During the implementation of its housing programs, Richland County will use this information to conduct targeted outreach to these populations and neighborhoods to ensure information on CDBG-DR funded housing programs is available. Richland County will work with a network of non-profit organizations and volunteers to ensure information is disseminated to Low and Moderate income neighborhoods in need of housing assistance.

4.4.1 Assistance for the Homeless, Low Income and Other Special Needs

Richland County will work to address disaster-related homeless needs through the proposed housing programs outlined in this Action Plan. As outlined in section 2.5, Households of Low and Moderate Income who were impacted by the disaster are at the highest risk for homelessness. As such, it is anticipated that providing priority housing assistance to these residents will help to return currently homeless residents to a safe and adequate housing unit while preventing additional residents from becoming homeless.

While the County's CDBG-DR resources are not sufficient to address the needs of all groups, the County is committed to supporting other entities in their efforts to provide needed resources and public services to assist the homeless, low-income populations, residents with special needs and other vulnerable populations. Richland County Community Development staff will continue to work closely with organizations that serve the needs of homeless, limited income, and special needs populations through ongoing participation in a wide range of committees and community-based efforts. In addition to the programs outlined in this Action Plan, Richland County will continue to support these ongoing efforts. This will include aiding in the prevention of homelessness by providing assistance to local area homeless agencies and those who serve the homeless, and continuing to support the Homeless Management Information Systems (HMIS) program to better track needs and resources to assist the homeless.

The County has a number of programs that provide shelter and assistance to the homeless and at-risk populations, many of which are vital resources in response to natural hazard-related impacts. There are several programs and projects under way to provide additional supportive housing, prevent homelessness, address emergency shelter needs and develop transitional housing and supportive programs for transitional housing. As a partner in the Midlands Area Consortium for the Homeless (MACH), Richland County addresses the concerns of the continuum of care, which involves emergency shelter, transitional housing and programs to assist in the areas of permanent housing and independent living.

Since August 2012, Richland County United Way of the Midlands has assumed administration for the MACH Region's two Homeless Management Information Systems (HMIS) grants funded by HUD. Richland County provides the local match of 25% through CDBG funding. The HMIS system is the central point-of-entry for homeless clients in the Midlands as well as throughout the MACH region. Through these efforts, Richland County is working to close the gap on affordable housing and other needs to end chronic homelessness in the Midlands. This effort also provides gap financing and incentives to nonprofits and developers to create



affordable housing for low and moderate income populations. This same partnership helps fund operating costs for the transition center for the homeless in the City of Columbia, serving up to 150 day center participants in addition to up to 214 emergency respite, program entry and transitional housing units.

Richland County also administers the Homeless Prevention and Rapid Re-Housing (HPRP), a program used to prevent persons from becoming homeless or to assist those who are experiencing homelessness to be quickly re-housed and stabilized. Additionally, there are upwards of 64 programs administered by public, private, non-profit, and faith-based organizations focused on assisting the homeless and preventing homelessness throughout the County. Collectively these initiatives will support the needs of currently homeless residents and help to prevent additional residents from becoming homeless.

Multiple opportunities for assistance both with rental costs and homeownership for persons of low and moderate incomes are available in Richland County. A total of 2,074 public housing units are provided through the Columbia Housing Authority. The Section 8 Housing Choice Voucher Program provides rent subsidies to low and very low-income households. There are 3,047 Housing Choice Vouchers in the CHA Section 8 program, including 25 vouchers for the homeless, 100 vouchers for the Mainstream (disabled) Program, and 34 Homeownership vouchers. In addition, the CHA also has 29 SRO vouchers, 99 Moderate Rehab Certificates, 90 HOPWA vouchers, 1 Disaster Voucher, 150 Veterans Affairs Supportive Vouchers, and 28 Tenant Protection Vouchers. Within private housing developments, a total of 6,536 assisted housing units are available to residents of the Richland County area who are in need. CHA also administers the Section 8 Rental Assistance Program for residents of Richland County, which provides rental assistance to persons with low incomes who want to live in homes in the private rental market, but cannot afford market rental rates.

Other programs supported by the CHA include the Family Self-Sufficiency (FSS) Program, Celia Saxon Homeownership Program, and the Section 8 Homeownership Program. The CHA's Hope VI and FSS Department's FSS program assists families in their efforts to become independent of government aid by improving their economic situation through employment, education and job training. The Celia Saxon Second Mortgage Homeownership Program enabled eligible families with a gross household income at or below 80% of the area median income in the Celia Saxon community to receive up to \$25,000 in down payment and closing cost assistance in purchasing a single-family home. 96 homes were sold under this program. The Section 8 Homeownership Program enables families who are currently housed under the CHA Section 8 Housing Choice Voucher Program to convert their rental subsidy to a Housing Assistance Payment (HAP) that can be used toward the purchase of a single-family home, condominium or townhouse for up to 15 years. Elderly or disabled families may receive assistance for up to 30 years.

In addition to the CHA programs, the US Department of Agriculture (USDA) administers several housing programs in the rural areas of Richland County through their Rural Development program, including Section 502 Program-Insured, Section 502 Program-Guaranteed, Section 504 Program-Insured Loans and Grants, Technical Assistance Grants, Section 515 Program loans, Section 533 Housing Preservation Grants, Section 538 Rural Rental Housing Guaranteed Loan Program, and Section 516 Farm Labor Loans and Grants. Collectively, these programs provide a suite of assistance options for moderate to very low and low-income rural families and individuals to become homeowners, improve existing homes, and access affordable rental housing. These programs encourage and support the provision of disaster-resistant housing situations for families and individuals.



Richland County's Homeowner Rehabilitation Program provides housing assistance to special populations, particularly elderly and/or disabled residents. Elderly Richland County homeowners who wish to make improvements to their homes such as correction of building code violations, removal of lead-based paint hazards and general property improvements may qualify for the Program's no interest, deferred forgivable loans through that are funded through the HOME program. Elderly loan recipients are not required to repay the loans as long as they continue to reside in the home. The Elderly, 62 and over, constituted 12.5 percent (48,035 persons) of the total population in the County in the 2010 ACS.

4.5 Minimizing and Addressing Displacement

The City plans to minimize displacement of persons or entities and assist any person or entity displaced as a result of implementing a project with CDBG Disaster Recovery funds. Richland County will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as well as implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided for this grant. To this end, Richland County has in effect a residential anti-displacement and relocation assistance plan and will follow its provisions and requirements in connection with any activity assisted with funding under the CDBG program.

4.6 Program Income

Any program income resulting from programs/projects derived from CDBG-DR funds will be re-allocated to the purposes for which this plan has been developed. By doing so, the County will ensure that program income will aid in the continuing recovery process for Richland County and allow for the maximum benefits to be accomplished in the utilization of CDBG-DR funds.

4.7 Performance

Performance goals have been established in this Action Plan for each proposed use of CDBG-DR funding. Richland County will diligently track the performance of each program and project funded through the CDBG-DR program and will regularly document progress towards achieving performance goals.

As each project moves through implementation Richland County will evaluate performance reports and determine any corrective action as needed. Based on performance Richland County may determine the need to modify existing programs or create new programs. This effort will work in conjuncture with the ongoing needs assessment and together will determine any adjustments, enhancements, or improvements to the overall program and its implementation. Any changes to proposed CDBG-DR funded activities will be documented in an amendment to this Action Plan.

4.8 Plan Clarity and Citizen Participation

Richland County made concerted efforts to involve citizens and stakeholders in the development of this Action Plan including the identification of unmet needs and recovery programs and projects to address these needs. Richland County encourages open citizen participation and comment on the Action Plan and incorporated public concerns and comments into the Plan during the development process.

During the development of this CDBG-DR Action Plan, Richland County conducted 10 public meetings. These meetings were held throughout the County to provide opportunities for citizens to learn about the CDBG-DR program, describe impacts from the disaster, identify additional unmet needs, and inform the development of



recovery programs and projects. Public meetings were advertised using a variety of media and outreach methods to help reach as many impacted residents and stakeholders as possible. Outreach included flyers, radio public service announcements, County website announcements, and announcements during gatherings at community and faith-based organizations.

Richland County also held 4 stakeholder meetings with individuals representing a cross-section of the County such as community leaders, elected officials, faith-based organizations among others. During these meetings stakeholders were given the opportunity to assist the County in identifying impacts and unmet needs from the disaster and discussing key recovery topics specific to their area of expertise. The following stakeholder engagement meetings were conducted to inform the development of this Action Plan:

- Civil rights
- Homeless
- School districts
- Elected officials

Richland County was also supported by multiple committees and organizations throughout the development of this Action Plan. These groups consisted of representatives from Local, County and State governments as well as non-governmental organizations such as non-profits, community organizations, and VOADs among others. For additional information on these groups, their contributions and their responsibilities please refer to Section 1.2.

Richland County published this Action Plan for a 24 day public comment period between August 26, 2016 and September 18, 2016. Members of the public were invited to view the draft Action Plan prior to its submission during normal business hours of 9:00 a.m. to 4:00 p.m., Eastern Standard Time, Monday through Friday, at the Richland County Community Development Office, 1410 Laurens Street, Columbia, SC 29204. The draft plan was also available for review on Richland County's website. Based on the County's Language Access Plan, this Action Plan is made available in English, Spanish and Korean. Written comments may be mailed to the following address: Richland County Community Development Office, 1410 Laurens Street, Columbia, SC 29204. Electronic submission of public comments on this plan may be emailed to cranet@rcgov.us. Following the public comment period, this Action Plan was updated with responses to public comments and submitted to HUD for approval.

4.9 Substantial Amendment

If the need arises, this Action Plan will be amended in accordance with the Federal Register and all related HUD requirements. The following modifications will constitute a substantial amendment to this Action Plan:

- A change in program benefit or eligibility criteria
- The allocation or re-allocation of more than \$1 million
- The addition or deletion of an activity

Prior to submitting a substantial amendment, the County will work with its HUD representative to ensure the proposed change is consistent with the Federal Register and all other HUD requirements.



SECTION 5. PRE-AWARD IMPLEMENTATION PLAN

Per the *Public Law 114-113 Guide for Review of Financial Management of CDBG-DR Grantees*, “each grantee must submit Risk Analysis Documentation to demonstrate in advance of signing a grant agreement that it has in place proficient controls, procedures, and management capacity.” This is inclusive of the grantee’s ability to prevent duplication of benefits as defined by Section 312 of the Stafford Act, as well as demonstration that the grantee “can effectively manage the funds, ensure timely expenditure of funds, maintain a comprehensive website regarding all disaster recovery activities assisted with these funds, and ensure timely communication of application status to applicants for disaster recovery assistance.” Finally, the grantee must demonstrate that it has adequate policies and procedures to detect and prevent fraud, waste, and abuse.

In addition to the financial management review, each grantee is required to submit an Implementation Plan to describe the grantee’s capacity to carry out the recovery, including the operational and program management functions relative to CDBG-DR funding. Any capacity gaps must be identified and filled based on the plan and timeline outlined by the grantee. Richland County submitted its *Risk Analysis Documentation & Implementation Plan* (Plan) to the local HUD field office, in Columbia, SC, on July 22, 2016.

5.1 Financial Controls

As a recipient of federal funds, Richland County is subject to the Single Audit Act of 1984, as amended in 1996. The Single Audit Act, which standardizes requirements for auditing federal programs, requires review of all federal programs by an independent Certified Public Accountant (CPA) for compliance with program requirements and proper expenditure of funds. All findings of the Single Audit are reported directly from the CPA to the County Administrator.

The County submitted its most recent Single Audit produced in response to the most recent audit conducted in accordance with 2 *Code of Federal Regulations* (CFR) part 200, subpart F, and its most recent financial statement prepared in accordance with 2 CFR 200.510. Neither the Single Audit nor financial statement indicate that Richland County has material weaknesses, significant deficiencies, or questioned costs.

The Richland County Department of Finance has completed *P.L. 114-113 Guide for Review of Financial Management*. The County Department of Finance affirms that it has the requisite financial controls in place to account for the \$23,516,000 of CDBG-DR funding in a manner that is consistent with all federal and local accounting requirements.

As an entitlement community, Richland County receives an annual allocation under CDBG that requires similar financial management processes, policies, and procedures to those required by the CDBG-DR program. However, the County is aware that there are differences between the CDBG and CDBG-DR programs, and will make the necessary accommodations to comply with Public Law 114-113. Those accommodations are described in more detail throughout the Implementation Plan.

Richland County has standards to ensure that accounting records contain the appropriate information on the CDBG-DR grant award, authorizations, obligations, unobligated balances, assets, liabilities, expenditures, program income as defined by the Federal Register Notice, and interest. Specifically, the County has a centralized accounting system to support the grants management function. The Integrated Financial and Administrative System (IFAS) is managed and maintained by the Information Technology Department. Core users of the system include the Finance Department, Human Resources Department, and Procurement Office,



although other departments also use the system. IFAS is an enterprise wide software application that is used for Budgeting, Purchasing and Disbursements, General Ledger accounting, Billing and Receivables, and Human Resources (HR)/Payroll. It is a web-based application that allows the purchasing and budgeting process to be distributed to department users and allows for greater management control of expenditures through real-time financial reporting and online approvals. Access levels are customized according to staff function and department.

The Department of Community Development will use HUD's Disaster Recovery Grant Reporting (DRGR) system to draw down funds and report program income. These systems, though used for reporting critical program metrics to HUD, will be used as grant management tools by the Department as well.

In addition to electronic systems, supporting original or source accounting documentation is maintained in compliance with the County's record-keeping policies. These policies comply with the record keeping requirements specified in FR-5928-N-01.

The County understands that the DRGR system is HUD's official system of record to submit the detailed Action Plan for project setup, draw down funds, report program income, and submit Quarterly Performance Reports. The official system of record for County financial records and reporting is IFAS. County staff members attended HUD-hosted DRGR training in Denver, Colorado, on July 27-28, 2016. County staff members will be responsible for all DRGR project setup and data entry. The DRGR records and the County financial records and other reporting data points will be reconciled by County staff.

The County has established clear and actual lines of responsibility and approval authority, including separation of duties. CDBG-DR program finance is overseen by the Chief Financial Officer (CFO) who leads the Richland County Department of Finance. Within the CFO's office, the lines are drawn between financial management, monitoring, and compliance functions.

The Richland County Finance Office is responsible for maintaining the fiscal integrity of the County's financial records. This office reports results of the County's operations and changes in its financial position to various interested parties such as state and federal grantors, regulatory agencies, and concerned taxpayers.

Functions and Responsibilities of this office include:

- Accounts Payable – Provide payment for invoices to county vendors.
- Fiscal Auditing – Prepare Annual Financial Statements and other financial reports as required or requested by federal and state agencies, County Council, Administration, or financial markets.
- Budgeting – Create and Maintain the County's Annual Budget.
- Payroll Processing – Process and maintain employee time records, and issue employee payroll checks.
- Accounts Receivable – Process collections and payments for Water, Sewer, landfill, Retiree Insurance, and Employee Parking.

Accountability and financial transparency are not only required by the Federal Government where federal funds are used, but are hallmarks of a well-run government. As a leader in transparent financial reporting, Richland County is posting unaudited Budget Reports and Accounts Payable Check Register online with the Annual Comprehensive Annual Financial Report (CAFR) and Approved Budget.



The Richland County Finance Department prepares the CAFR in conformity with Generally Accepted Accounting Principles (GAAP) as applied to governmental units. Additionally, the County's reporting entity applies all relevant Governmental Accounting Standards Board (GASB) pronouncements. Proprietary funds, governmental funds, and business-type activities apply Financial Accounting Standards Board (FASB) pronouncements and Accounting Principles Board (APB) opinions issued on or before November 30, 1989, unless those pronouncements conflict with or contradict GASB pronouncements, in which case, GASB prevails.

The Government Finance Officers Association (GFOA) has awarded Richland County with the Certificate of Achievement for Excellence in Financial Reporting every year since July 1, 1982.

5.2 Procurement

In addition to local and state law, procurement for CDBG-DR programs is governed by federal regulations under 24 CFR Part 570, 24 CFR Part 85, and 2 CFR 200.318-200.36. The Richland County Code (RCC) is the local body of law governing procurement activities. Please see <http://www.richlandonline.com/Government/Ordinances.aspx> for access to the RCC.

The Richland County Office of Procurement and Contracting is currently following the RCC and its own procurement standards where these standards are equally or more restrictive as the federal requirements. However, where the local procurement standards are less restrictive, the more stringent federal requirements will be followed for CDBG-DR programs. The County is currently revising its Procedures Manual to reflect procurement standards that comply with the specifications detailed in 2 CFR 200.318 through 200.326 (subject to 2 CFR 200.110, as applicable), where the local requirement contains a lesser standard than the federal requirements. Necessary proposed revisions will ensure that Richland County has documented procurement procedures that conform to State and local laws, regulations, and guidance in 24 CFR 200.318-326, including provision for procurement of recovered materials.

For each acquisition of services or items that will be funded by CDBG-DR funds, the County will adhere to the RCC, its Procurement and Contracting Procedures Manual, the Contracting Officer's Representative Operational Procedure, and all terms and conditions expressed in its contracting documents entitled *General Conditions* and *Home Rehabilitations Terms and Conditions*. All revisions to the Procedures manual are expected to be fully adopted upon the appointment of the new Director of Procurement and Contracting.

Per Federal Register Notice 5928-N-01, Part III, Management and Oversight of Funds, Section 2(a) Procurement, the County provides the following chart cross-referencing the RCC and Procurement & Contracting Procedures Manual to the statutory requirements in 2 CFR 200.318 – 200.326. Though the Procedures Manual identifies lines of responsibility, the listing below also provides this information. The County's procurement practices meet the federal requirements in 2 CFR 200.318-200.36 ensuring fair and open competition.



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
2 CFR 200.318(a)	Documented procurement standards	RCC Chapter 2 Administration, Article III Administrative Offices and Officers, Division 9 Office of Procurement, Sections 2- 153-156 Sections 1-12 of Procedures Manual	Office of Procurement & Contracting
2 CFR 200.318(b)	Contractor oversight	RCC Chapter 2 Administration, Article X Purchasing, Division 5 Nondiscrimination in contract procedures; RCC Chapter 2 Administration, Article XI Inquiries and Investigations Contracting Officer’s Representative (COR) Operating Procedure, attached to Procedure Manual Home Rehabilitations Terms and Conditions “Contract Administration”	Office of Procurement & Contracting
2 CFR 200.318(c)	Conflict of interest provisions	RCC Chapter 2 Administration, Article IV Code of Ethics; RCC Chapter 2 Administration, Article X Purchasing, Section 2-592 Prohibited Contracts; RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-620 Personal Interests Procedure Manual Section 7: Selection of Firms for Professional & Consulting Services Home Rehabilitations Terms and Conditions “Improper Influence”	Office of Procurement & Contracting
2 CFR 200.318(d)	Avoidance of unnecessary acquisition	RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-619 Central supplies and Services	Office of Procurement & Contracting
2 CFR 200.318(e)	Promotion of economy (intergovernmental agreements / inter-entity agreements)	RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-619 Central supplies and Services; Procedure Manual Section 8: Blanket Purchase Agreements; Section 9: Blanket Purchase Orders	Office of Procurement & Contracting
2 CFR 200.318(f)	Excess and surplus property	RCC Chapter 2 Administration, Article III Administrative Offices and Officers, Division 9 Office of Procurement, Section 2-153 Creation of the office of procurement, generally; RCC Chapter	Office of Procurement & Contracting



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
		2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-616 Sakes if County Property.	
2 CFR 200.318(g)	Value engineering clauses	Procedure Manual Section 5: Other Types of Bids	Office of Procurement & Contracting
2 CFR 200.318(h)	Responsible Contractors	RCC Chapter 2 Administration, Article X Purchasing, Division 1 Generally, Section 2-590 Definitions Procedures Manual Section 4: Requests for Bids; Section 7: Selection of Firms for Professional & Consulting Services	Office of Procurement & Contracting
2 CFR 200.318(i)	History of Procurement	RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Section 2-617 Purchasing Files	Office of Procurement & Contracting
2 CFR 200.318(j)	Use of Time and Material Contracts	Procedures Manual, Introduction and Background	Office of Procurement & Contracting
2 CFR 200.318(k)	Settlement of contractual and administrative issues	RCC Chapter 2 Administration, Article III Administrative Offices and Officers, Division 7 County Attorney, Section 2-143 Settlement of Claims; RCC Chapter 2 Administration, Article X Purchasing, Division 3 Procedural Requirements, Sections 2-621.1 Authority to resolve protested solicitations and awards, 621.2 Authority to Debar or suspend; 621.3 Authority to resolve contract and breach of contract controversies Procedures Manual Section 7: Selection of Firms for Professional & Consulting Services General Conditions #s 16, 25, 52, , 53, 58 Home Rehabilitations Terms and Conditions "Default", "Defective Work", "Dispute Resolution", "Governing Laws/Disputes", "South Carolina Law Clause", "Termination"	Office of Procurement & Contracting
2 CFR 200.319	Competition	RCC Chapter 2 Administration, Article X Purchasing, Division 2 Competitive Purchasing Policy, Section 2-598-614; Chapter 2, Article X, Division 3 Procedural Requirements	Office of Procurement & Contracting



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
		Procedures Manual Section 3: Advertisement	
2 CFR 200.320	Types of Procurement	RCC Chapter 2 Administration, Article X Purchasing, Division 2 Competitive Purchasing Policy, Section 2-598-614; Chapter 2, Article X, Division 3 Procedural Requirements Procedures Manual Section 2: Source selection; Section 4 Requests for Bids (RFP); Section 5 Other Types of Bids; Section 6 Request for Information & Competitive Proposals; Section 7: Selection of Firms for Professional & Consulting Services; Section 8 Blanket Purchase Agreements (BPA); Section 9 Blanket Purchase Orders; Section 10: Quotations; Section 11 Sole Source Procedures; Section 12 Emergency Purchasing	Office of Procurement & Contracting
2 CFR 200.321	MBE/WBE, Surplus provisions	RCC Chapter 2 Administration, Article X Purchasing, Division 6 Minority Procurement Requirements; RCC Chapter 2 Administration, Article X Purchasing, Division 7 Small Business Enterprise Procurement Requirements	Office of Procurement & Contracting
2 CFR 200.322	Procurement of recovered materials	To be addressed in Procedure Revision	Office of Procurement & Contracting
2 CFR 200.323	Contract cost and price	RCC Chapter 2 Administration, Article X Purchasing, Division 1 Generally, Section 2-593 Contract Authority; RCC Chapter 2 Administration, Article X Purchasing, Division 2 Competitive Purchasing Policy, Section 2-600 Procurement of professional services, Section 2-601 Competitive sealed proposals; 2-608 Invitation to Bid, 2-609 through 2-614 RCC Chapter 2 Administration Procedures Manual Section 10: Quotations Procedures Manual, Introduction and Background Home Rehabilitations Terms and Conditions "Covenants Against Contingent Fees", "Responsibility"	Office of Procurement & Contracting
2 CFR 200.324	Federal Pass through	Procedures Manual, Introduction and Background	Office of Procurement & Contracting



2 CFR Statutory Citation	Statutory Requirements	Richland County Office of Procurement & Contracting Procedures Manual	Richland County Responsible Department
2 CFR 200.325	Bonding	RCC Chapter 2 Administration, Article X Purchasing, Division 4 Performance Bonds	Office of Procurement & Contracting
2 CFR 200.326	Federal contract provisions	Procedures Manual, Introduction and Background General Conditions #s 2, 4, 8, 21, 22, Home Rehabilitations Terms and Conditions “Acts, Laws, and Regulations”, “Affirmative Action”, “Anti-kickback Procedures”, “Drug Free Workplace Act”, “Environmental Hazards”, “Equal Employment Opportunity”	Office of Procurement & Contracting

5.3 Prevention of Duplication of Benefits

Federal law prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which he/she has already received financial assistance under any other program, private insurance, charitable assistance or any other source. Such duplicative funding is called Duplication of Benefit (DOB). This prohibition laid out in the Stafford Act, as amended, is a significant added layer of regulation not found within the County’s entitlement CDBG program. This is a new regulation with which the County will comply for its CDBG-DR grant.

Pursuant to the Stafford Act, the County will establish and follow policies and procedures to uphold the safeguard against DOB within its program guidelines for each eligible activity. Understanding that prevention of DOB is especially critical in the context of housing programs, the County has established a framework for identifying potentially duplicative sources of funds and reducing documented duplications from potential project awards prior to any award actually being made.

During the application period and eligibility determination, a case manager will document sources of funds received or approved from private insurance, SBA, FEMA, and / or volunteer organizations (including in-kind assistance) used for the same purpose that the CDBG-DR award will be intended. Once sources have been identified and after determining an applicant’s remaining unmet recovery need, any sources of funds previously received for the same recovery need will be deducted except where those funds were spent on activities allowable per Stafford Act and HUD guidance, sometimes known or referred to as Allowable Activities. Allowable Activities will not result in a reduction of the final award. Additionally, per the Federal Register Notice and longstanding HUD guidance, forced mortgage payoffs will not be considered duplicative, as those funds were never available to the applicant.

We understand that applicant benefits from FEMA, SBA, and insurance can be a moving target with additional funds received much later than initial payouts or due to appeals and litigation. Further, all funding sources may not be known at the time of application. Therefore, Richland County will continuously monitor program applicants and perform its due diligence to verify benefits that may have been secured from FEMA, SBA, private insurers, charitable contributions, and any other available financial assistance after the date of application.



Late or additional benefits from other sources can also result in a change to the outcome of the award amount for which an applicant is ultimately eligible. Applicant awards may have to be adjusted as new sources are identified to prevent DOB and minimize recapture.

The County has already secured FEMA and SBA data that it will use as a part of its DOB analysis and is working to put agreements in place to obtain updated data feeds. Further, the County has already established relationships with volunteer organizations that have provided assistance to disaster-affected citizens. The County will work to leverage these relationships and applicant release forms to obtain additional DOB data from philanthropic sources.

As a part of its case management process, the County will require applicants to execute an Application for Assistance that will include an Income Certification, Insurance Certification and Release, Philanthropic Release of Information, and Subrogation Agreement, which will become part of each applicant's record. These documents will hold each applicant accountable for the accuracy of information provided and also give the County recourse if it is determined at a later time that applicants received other financial assistance not identified at the time of application.

If a duplication of benefit arises within the term of the applicant benefit delivery and compliance/monitoring period, Richland County will adhere to the guidelines set forth in OMB Circular A-87 and the Stafford Act (Chapter 37 of Title 31) for recapture of funds. Beneficiaries of CDBG-DR program funds will be informed of fund recapture in an agreement executed with the County if it is determined that a DOB exists. RCCD will bear responsibility for ensuring compliance with DOB regulatory requirements at the eligibility stage, and for monitoring latent additional funding sources.

5.4 Timely Expenditures

Per Federal Register Notice 5938-N-01, CDBG-DR funds must be expended within a 6-year time frame beginning on the date the grant agreement is signed by HUD. However, we understand that HUD will periodically review the County's progress in drawing down funding from its Line of Credit (LOC). Richland County will review in-house expenditures and beneficiary expenditures to ensure that funds are spent on eligible costs and in a timely manner. Project funds and schedules will be monitored by Richland County's Finance Department, the Department of Community Development, the County's planning and management consultant(s), and ultimately audited through the County's independent audit function.

As Richland County is an entitlement community, County staff members already have experience with monitoring the expenditure rate of its annual CDBG allocation. With the County's current allocation of CDBG funds, Richland County's Department of Community Development maintains detailed spreadsheets monitoring the expenditure of funds and project schedules. Considering that the CDBG-DR grant to the County is more than 23 times the usual annual allocation, the County will adapt and enhance its current processes by establishing standard tracking mechanisms, processes, and templates to ensure consistency and continuity among program activities. Richland County will also maximize its use of technology to support and augment any standard processes instituted to ensure timely expenditure of funds.

Richland County will hold all contractors accountable through the establishment of benchmarks and other critical milestones. Contractors will be required to provide detailed reports concerning expenditure of funds and project progress to the County upon its request. Frequency of reporting will be established on a per project basis given the potential varied nature of eligible activities that the County may choose. It is expected that the



County will require contractors to provide monthly reports; however, due to the varying nature of each project, specific projects may be asked to provide those project updates more frequently.

The County expects, at this time, that it will administer all CDBG-DR programs and will use contractor augmentation to execute implementation. When contracting with contractors or other recipients, the County will establish certain benchmarks that must be achieved prior to the release of funding. As a part of its contractual obligations to the County, contractors will be required to present the County with a plan on how they will implement procedures to reach the determined benchmarks. Each contract with contractors will require that penalties be implemented for failure to reach benchmarks. In addition to ensuring that contractors are meeting project timelines, these benchmarks will allow the County to project expenditures for each individual project.

Per Federal Register Notice 5938-N-01, Richland County will submit a projection of expenditures and an outcomes plan to HUD within 120 days after the initial Action Plan has been submitted through the DRGR system. Revised projections will be sent to HUD when program changes impact projected outcomes, funding levels, and recovery timelines. We understand that HUD will use this information to track the County's proposed versus actual performance. It will serve as a tool to measure overall performance, as well as project-specific performance. The County will aggressively monitor its contractors, using benchmarks, milestones, and projections as a means to prevent bottlenecks in the process while also minimizing delays in expending funds for eligible project activities.

Richland County has a variety of unmet needs, and as such will undertake a variety of projects to meet those needs. We understand that some projects/programs may take longer than others to implement and complete. In an effort to demonstrate consistent progress towards recovery, the County will direct attention toward those programs furthest along in development, with an eye toward eliminating internal regulatory barriers that limit its ability to move forward on projects that are critical to the community's resilience and sustainability efforts, such as drainage and larger infrastructure projects. These projects may take longer to plan and coordinate. The County will consider how it may phase longer term projects to demonstrate progress.

Using the project monitoring tools, the County will identify any project that appears to be stalled or which has not commenced in a timely manner. Corrective action plans will be established to get the projects back on target. Corrective actions may include reassignment of work packages to other contractors or reprogramming of funds to other projects. Once the program activities are defined, specific parameters for project timelines and corrective measures will be detailed within the Action Plan.

5.5 Management of Funds

Richland County will ensure that the appropriate protocols are in place to manage the CDBG-DR funds and to incorporate measures to prevent any fraud, waste, and/or abuse of government funds. The County will use its existing protocols and resources supplemented by its planning consultant(s) to assist with the development of policies, procedures, and other program resources to effectively manage program funds.

5.5.1 Documentation and Monitoring

Richland County understands its fiduciary duty to ensure proper disbursement of grant funds for eligible activities. Richland County will remain in compliance with applicable CDBG-DR rules and regulations, as well as other applicable federal regulations such as Office of Management and Budget Circulars A-87, A-133, 2 CFR 200.318 - 326 and 24 CFR Part 85 (Uniform Administrative Requirements) in the management of the CDBG-DR



funds. Richland County will institute measures to detect, investigate, and mitigate fraud, abuse, and mismanagement related to accounting, procurement, and accountability. The County will adhere to the conflict of interest provisions referenced at 24 CFR 570. While HUD will monitor the compliance of the County Department of Community Development, the County Department of Community Development will:

- Fund only expenditures that are eligible CDBG activities, address disaster-related needs directly related to the approved natural disaster, and meet at least one of the national CDBG objectives.
- Document that all program activities meet a national objective, address disaster-related needs, and are eligible activities.
- Document all program costs and maintain supporting documentation for all administration costs incurred and activities undertaken.
- Develop a monitoring policy that will outline the activities that will be monitored and the compliance parameters for each activity, including frequency of the monitoring activities. The County envisions that it will monitor project activities no less than quarterly to ensure compliance and timely expenditure of funds. We anticipate that monitoring activities will include project and applicant file review, as well as on-site visits to projects. The County will utilize resources including written monitoring and technical assistance guidelines, checklists, and policies and procedures that will be developed specifically for the CDBG-DR program activities selected for implementation, using existing CDBG resources and HUD's Disaster Recovery Monitoring Checklist as a template for their creation.
- Build monitoring and compliance requirements into all contracts executed with vendors, professional services, and construction contractors. Vendors will be required to submit project performance reports, financial status reports, and documented requests for reimbursement/invoicing for the duration of contract periods.
- Provide a quality assurance (QA) / quality control (QC) function for internal checks-and-balances, including random sample file audits as a self-check. This will include source documentation file audits conducted monthly by Department of Community Development staff, as a first-level internal check.
- Use the HUD-provided DRGR contracts management system and upload all quarterly performance reports (QPR) to that system. The County will develop QPRs that will be submitted to HUD no later than 30 days following the end of each quarter after grant award, and continuing until all funds have been expended and all expenditures have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted obligated, drawn down, and expended; the funding source and total amount of any non-CDBG Disaster Recovery funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes; and the race and ethnic status of persons assisted under direct-benefit activities. The County will also post the submitted Quarterly reports to its official website.
- Enter its Action Plan for Disaster Recovery, including performance measures, into HUD's DRGR system. As more detailed information about uses of funds is identified by the County, it will enter such detail into DRGR.
- Develop and implement corrective actions if any weaknesses are identified during monitoring activities.

In addition, the County Council has authorized the County Administrator to hire an independent auditor who will report directly to the County Administrator. The Auditor's ultimate responsibility will be to ensure compliance with CDBG-DR rules and regulations as prescribed under Public Law 114-113, and prevent occurrences of fraud, waste, and abuse of these federal funds. The Auditor will test for compliance with financial standards and procedures including procurement practices and cost reasonableness investigations for



all operating costs and grant-funded activities. All program expenditures will be evaluated to ensure they are necessary and reasonable, allocable, and made in accordance with Generally Accepted Government Auditing Standards (GAGAS).

Responsible Party	Monitoring Activity & Purpose	Minimum Frequency	Method
CDBG-DR Asst Program Manager	Develop written monitoring and technical assistance guidelines, checklists, and policies and procedures specifically for the CDBG-DR program activities selected for implementation, using existing CDBG resources and HUD's Disaster Recovery Monitoring Checklist as a template for their creation	N/A	Develop written materials
CDBG-DR Program Manager	Review and approve initial set of written monitoring and technical assistance guidelines, checklists, and policies and procedures specifically for the CDBG-DR program activities selected for implementation	N/A	Sign off on written materials or provide revision comments
CDBG-DR Asst Program Manager	Review and update monitoring tools and technical assistance guidelines, checklists, and policies and procedures	Monthly	Update materials as needed or document that no update is needed as of date of review
CDBG-DR Program Manager	Review and update monitoring tools and technical assistance guidelines, checklists, and policies and procedures	Monthly	Sign off on written materials or provide revision comments
CDBG-DR Program Manager	Review program activities to ensure the County funds only expenditures that are eligible CDBG activities, address disaster-related needs directly related to the approved natural disaster and meet at least one of the national CDBG objectives	Quarterly	Review program and project specific financial reporting to verify proper expenditure



Responsible Party	Monitoring Activity & Purpose	Minimum Frequency	Method
CDBG-DR Asst. Program Manager	Review program activities to ensure the County funds only expenditures that are eligible CDBG activities, address disaster-related needs directly related to the approved natural disaster and meet at least one of the national CDBG objectives	Monthly	Review program and project specific financial reporting to verify proper expenditure
CDBG-DR Program Manager	Review activity files to ensure that documentation of all program activities meet a national objective, address disaster-related needs and are eligible activities.	Quarterly	Program Document Review including policies and procedures and random sample QA project files
CDBG-DR Asst. Program Manager	Review activity files to ensure that documentation of all program activities meet a national objective, address disaster-related needs and are eligible activities.	Monthly	Program Document Review including policies and procedures and random sample QA project files
CDBG-DR Program Accountant	Financial Audit Testing	Monthly	Industry approved financial analyses and financial audit testing methods
CDBG-DR Asst Program Manager	Assessment of Corrective Actions Needed	Bi-weekly	Assessment of contractor capacity and benchmarks; progress toward project completion. May include site visits, desktop review, interviews.
CDBG-DR Program Manager	Corrective Action Plan Approval	Bi-Weekly	Review of file documentation and Corrective Action Plan.
Housing Program Manager or Public Works Director (Depending on project type)	Corrective Action Plan Development	Monthly	Root cause analysis including document / file review, progress reporting review; interviews, and site visits (as necessary); recommendations for path forward and penalties; recommendation for recapture or reprogramming of funds



Responsible Party	Monitoring Activity & Purpose	Minimum Frequency	Method
			depending on nature and extent of issue
CDBG-DR Program Manager	Contract Monitoring	Monthly	Document contractor performance for compliance with contract terms, benchmarks, timelines and deliverables; review of production reports
Housing Program Manager & Department of Public Works	Production Reporting showing individual project progress	Twice per week (housing); Monthly (Infrastructure)	Provide Program and Asst Program Manager with progress reports to monitor program and project progress
CDBG-DR Program Manager	Duplication of Benefit Updated Data Feeds	Monthly	Verifying that no new data source has been issued from federal data sources
CDBG-DR Asst Program Manager	Award and Duplication of Benefit Calculation QA	Weekly	Random File Sample
Housing Program Manager & Lead Case Worker	Award and Duplication of Benefit Calculation QC	Daily	QC of every file completed

5.5.2 Anti-Fraud, Waste, and Abuse

Richland County has developed an Anti-Fraud, Waste, and Abuse (AFWA) policy specifically for its CDBG-DR program. Once this policy is approved, it will be posted to the Flood Recovery Website.

To assist with identifying suspected fraud, waste, or abuse, the County will set up links on its Flood Recovery website for anyone to report suspect actions. The link will be connected to an email address that will be monitored daily. In addition, a potential complainant will be able to call or submit a handwritten complaint by mail or deliver it in person. All details of these contact options will be published on the website and contained within the final version of the AFWA policy.

Any discovered, suspected, or reported fraud, waste, and abuse within the CDBG-DR programs will be documented and reviewed. The disposition of the incident will be documented in a written decision. Any corrective or disciplinary actions will be carried out in accordance with Richland County law and County



personnel rules. Suspected fraud that requires further investigation and proven fraud situations will be referred to the CDBG-DR Program Manager or Deputy Program Manager, County Administrator, and HUD Office of the Inspector General (OIG).

5.5.3 Conflict of Interest

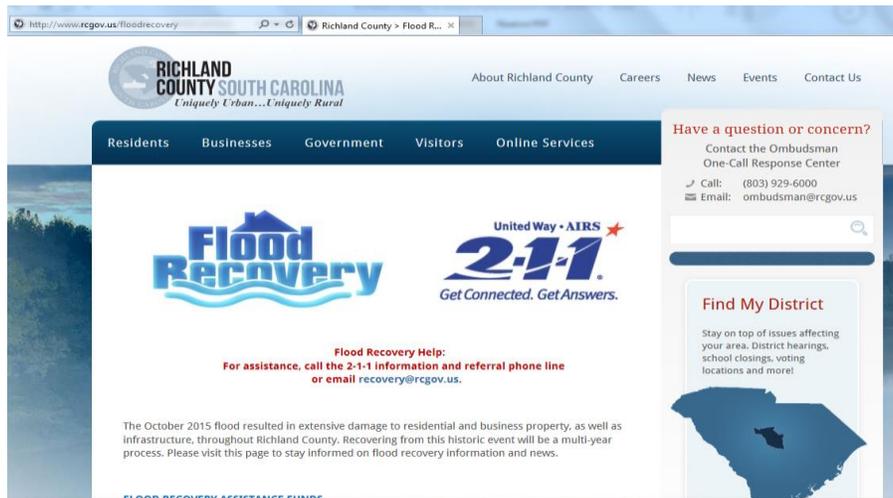
The County will adhere to the conflict of interest provisions reference at 24 CFR 570.611. Further, the County has adopted a high standard within its Code of Conduct Provisions that is consistent with 24 CFR 570.611. These provisions can be found within Richland County Code, Chapter 2, Article IV Code of Ethics.

5.5.4 Personally Identifiable Information

The Department of Community Development will follow existing practices to protect Personally Identifiable Information (PII) of program beneficiaries. All PII collected shall be conducted, to the extent applicable, in compliance with the Privacy Act (5 U.S.C. 552a) and all other federal, state, and local laws.

5.6 Comprehensive Disaster Recovery Website

Richland County has established a website, <http://rcgov.us/floodrecovery>, to keep the public informed about flood recovery activity and resources. The website is maintained by the County’s Public Information Office. It is accessible through the main page of the County Government website. The County will maintain this website throughout the recovery period.



The flood recovery website will serve as the primary repository of information for the County’s disaster recovery actions and resources, and will contain links to all action plans, action plan amendments, QPRs, the Citizen Participation Plan, procurement policies, procurement notices/advertisements, notices of public meetings, executed contracts, activity/program information for activities described in the action plan, and other information relevant to the CDBG-DR program funds. Updates to the dedicated disaster recovery website will be made in conjunction with any new activity associated with the CDBG-DR program action plan and funds. Further, any new documentation created in support of the CDBG-DR program will be published to the website within 5 business days of the final approved publication date.

Constituents will be able to lodge complaints via an email link on the website, as well as through non-electronic means. The email address for complaints will be monitored daily. The County will respond promptly within 15



days of receipt of each complaint. The CDBG-DR Deputy Program Manager will monitor the email address, log all complaints, and coordinate to provide responses.

Materials that will be published to the website in languages other than English, in compliance with the County's Language Access Plan, will include:

1. Action Plan
2. Action Plan Amendments
3. Citizen Participation Plan
4. Language Access Plan
5. Public Meeting Notices
6. Anti-Fraud, Waste and Abuse Policy
7. Program Applications and Required Forms
8. Program Guidelines
9. Complaint and Appeals policies.

All other documents will be made available in a language other than English upon request.

A QPR will be submitted to HUD no later than 30 days following the end of each quarter after grant award, and continuing until all funds have been expended and all expenditures have been reported. No less than 3 days prior to submitting to HUD, the County will post the QPR to the website for public comment. In addition to these required reports, the County will also post its procurement policies, executed CDBG-DR contracts, as well as the status of services or goods currently being procured by the County.

5.7 Timely Information on Application Status

Effective communication is one of the lynchpins of success in delivering programs, particularly in the wake of a disaster. Richland County will, at a minimum, engage in a two-tiered applicant communication strategy, with larger program-wide information being made available on the County's disaster recovery website and proactive case management to move applicants along within program processes, notifying applicants of status at each critical juncture.

Richland County believes that an effective and comprehensive communications strategy will better allow community access and create a culture of personal resilience and sustainability. The County has been proactive in engaging the community in an effort to create this culture, using the disaster recovery website as a clearinghouse of resources for community stakeholders. The County intends to maintain this website as the central repository of information to connect citizens to resources available from the CDBG-DR program activities we undertake.

The County understands that a lack of information about program resources, progress, filed claims, and applications for assistance can exacerbate frustration in potential program beneficiaries. Further, the processes required to deliver benefits, particularly in housing-related activities, are multi-step complex processes that require extensive documentation. The incremental steps within a program require time, and often patience. To mitigate the anxiety of applicants and keep them apprised of application progress, Richland County will need to institute systems that allow for real-time status updates to applicants upon request. Although the County will not know the volume of case management needed until outreach and intake activities begin, we anticipate instituting the following status update options:



- Providing direct access to an applicant’s designated case manager
- Monitoring case manager caseloads and adjusting as necessary to keep caseloads at reasonable levels that will ensure frequent applicant contact
- Sending electronic status notifications after critical milestones have been achieved, as well as outlining next steps
- Sending printed status updates to applicants who do not have access to electronic media
- Facilitating face-to-face consultations with case managers
- Monitoring after-hours voicemail systems daily, and instituting a policy of return calls within a specified timeframe of voicemail receipt
- Providing case manager email contact information to applicants.

One additional status-related issue that applicants may encounter is a program decision that the applicant considers adverse. The County will institute both a complaint and an appeals process to address citizen concerns and applicant grievances.

Complaints or grievances will be reviewed and a response will be issued within 15 business days, as required by HUD in the Federal Register notice. Where a complaint or grievance cannot be resolved within 15 days, the aggrieved party will be notified, in writing, of the expected timeline or process for resolution. Applicants will be notified of the complaint process at application intake, and information about the complaint process will be posted to the County’s disaster recovery website.

Appeals of program decisions will be acknowledged within 15 days of receipt and resolved according to the appeals process that will be developed for each of the program activities the County chooses to undertake. Applicants will be notified, in writing, of their opportunity to appeal decisions and the process for appealing at the application stage of the process. They will be reminded of their right to appeal through details provided on all program status notifications. Information about the appeals process will also be posted to the County’s disaster recovery website.

5.8 Capacity Assessment

Since 2002, Richland County has received an average annual allocation of approximately \$1,000,000 in CDBG entitlement funds. The County typically uses its program dollars to support three broad program areas—Homeowner Assistance, Financial Empowerment, and Neighborhood Revitalization. Specific programs include homeownership assistance and rehabilitation, emergency home repair, neighborhood revitalization, public improvements, and stimulus projects.

Through delivery of these programs, County staff members have already delivered programs in compliance with many of the regulatory requirements mandated under Federal Register Notice 5398-N-01 for CDBG-DR funding because they overlay the CDBG Entitlement Program. However, there are some additional regulations and/or alternative requirements that the County will be required to implement as a part of the CDBG-DR program. Although the County has the general programmatic and financial infrastructure in place, it will need additional support to efficiently manage the \$23.5 million allocation under the CDBG-DR program. The County understands that it will need supplemental staffing and has already undertaken steps to secure this support. Further determinations to add staff members will be made upon identification of the activities the County will undertake with the CDBG-DR funds.

The County has hired a planning and program administration consultant to assist with the Action Plan and Needs Assessment. The County also understands that it will have to undertake program management



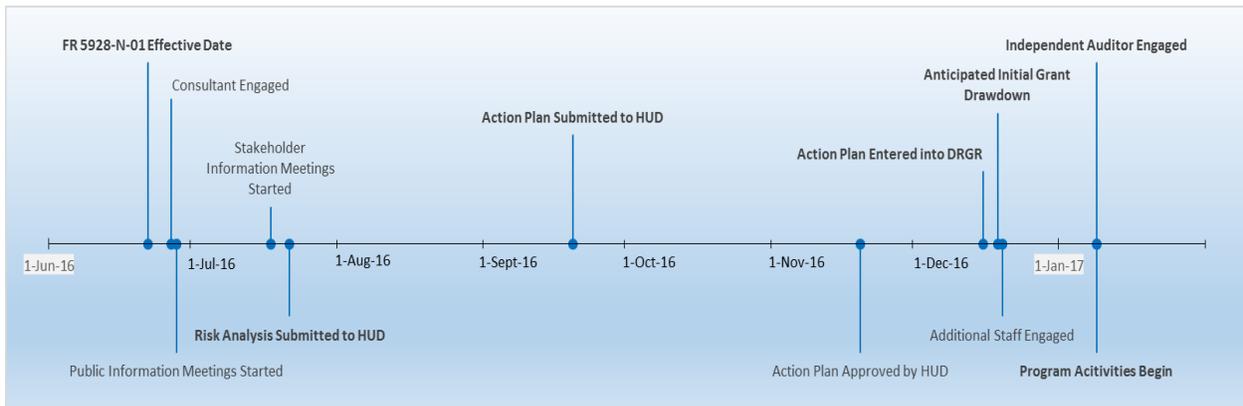
responsibilities covering various activities potentially in the areas of housing, infrastructure, and economic development. Due to the County’s limited staffing capacity, it does envision hiring and procuring the necessary staffing and expertise to augment the County’s current staff. The County anticipates acquiring both direct staff members and supplemental staff through the hired consultant in a staged manner to ramp up operations as needed, rather than hiring *en masse* prior to the signing of the grant agreement. By creating a staged hiring strategy, the County can most effectively conserve and use its limited resources.

The County plans to use professional consultants to assist with carrying out activities under the grant. The consultants will provide technical assistance to County staff, assist with developing standard operating procedures and program policies and procedures, provide environmental review, estimate and inspect services, assist with general program management, and provide other resources as necessary to fulfill the County’s obligations under the grant. The priorities identified during the Action Planning process will assist in the County’s assessment of the resources that may be needed to support program management functions.

The County has already hired a consultant to support its Action Plan process and to provide some auxiliary services to support activities in connection with program planning. The County’s consultant will provide the following services:

- Environmental Review
- Inspection and Cost Estimating
- Title & Appraisal Services
- Uniform Relocation Act Assistance
- Supplemental Staffing
- Intake Application Review

Below is a general timeline that highlights critical statutory and program milestones for delivery of the CDBG-DR Program. The timeline includes proactive steps taken to date, as well as the projected timeline for ramping up additional capacity once the Action Plan is approved.



The County has identified the departments responsible for functions of the CDBG-DR program:

County Department or Office	Responsibility
Office of the County Administrator	General oversight of CDBG-DR program delivery. Coordination of all departments in the delivery of the CDBG-DR programs. The Independent Auditor will report directly to the County Administrator.
Office of Emergency Management	Liaison between FEMA and Richland County in determining preliminary damage estimates; information will be used to determine unmet need and DOB analysis; also used to connect affected citizens to resources.



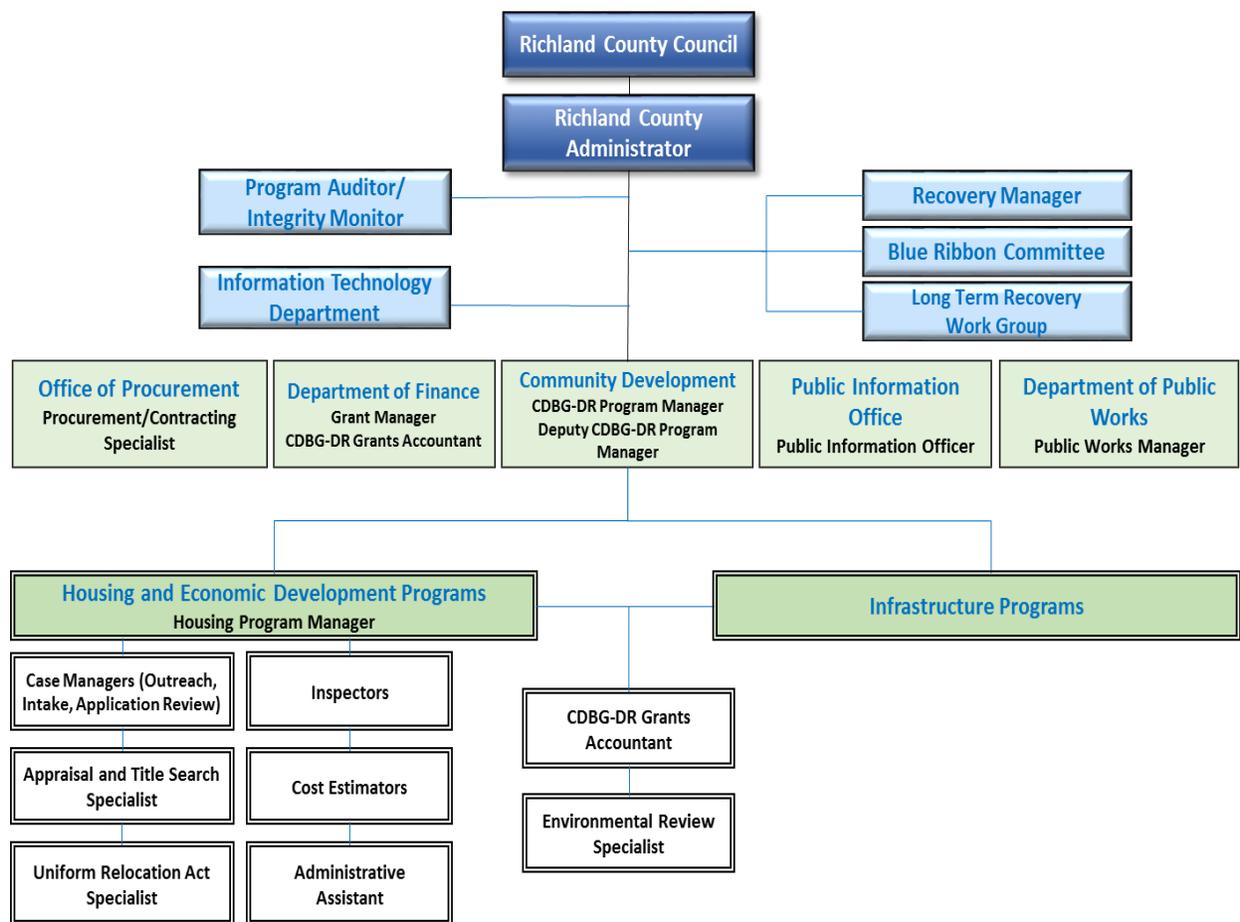
County Department or Office	Responsibility
Information Technology Department	Maintains IFAS; supports technology needs of County departments.
Public Information Office	Maintains comprehensive communications strategy for program activities including the disaster recovery website http://rcgov.us/floodrecovery .
Department of Finance	Implements financial controls and sound financial management practices to ensure financial compliance and timely expenditure of funds.
Office of Procurement & Contracting	Manages contracts for professional services and construction to ensure compliance with procurement and contractual obligations.
Public Works Department	Manages program activities for infrastructure projects including damage estimates; advises on appropriate resilience and sustainability measures that would potentially mitigate and/or prevent future flooding.
Department of Community Development	Responsible department for CDBG-DR funding. Coordinates departments in delivery of CDBG-DR programs, including program design and quality control functions. Provides general oversight and management for all housing and economic development programs, including DRGR maintenance, internal monitoring, case management, eligibility certification, and environmental compliance.



5.9 Staffing

Although the County has existing staff resources, it will also maximize use of the resources available through its partners. There are organizations in the community that have been critical to the response process. These organizations already have resources in place that could be tailored to meet needs under the County’s CDBG-DR programs. As the County is developing its staffing model, it will consider all options and determine what the most reasonable staffing model looks like in relation to the program activities it will undertake.

The County’s staffing model will be flexible to accommodate the needs associated with program activities. As the programs get underway, the County will make the appropriate adjustments to accommodate the work load. The organizational chart in this section shows the various functions that will be associated with program activities.



Note that the Housing Program Manager position is specifically called out in this organizational chart. Program Management functions for Economic Development and Infrastructure will be handled by the CDBG-DR Program Manager and the Public Works Manager, respectively.

The County has existing staff members who will fulfill the roles of:



- Information Technology Specialist
- Procurement/Contracting Specialist
- CDBG-DR Program Manager
- Public Information Officer
- Public Works Manager
- Case Manager
- Inspector

The County has hired the following position in support of the planning and implementation:

Deputy Program Manager for CDBG-DR, within the Department of Community Development.

The County expects to hire the following positions:

- **Independent Auditor** – will be hired through the County and accountable to the County Administrator
- **Grant Manager** – will be hired through the Department of Finance or contracted through existing consultant
- **CDBG-DR Accountant** – will be hired through the Department of Community Development or contracted through existing consultant
- **Housing Program Manager** – will be hired through the Department of Community Development or contracted through existing consultant
- **Case Managers** – will be in addition to existing staff members to augment capacity as needed, contracted through existing consultant
- **Appraisal and Title Search Specialists** – will be contracted out depending on program activity needs
- **Uniform Relocation Act Specialist** – will be contracted out through existing consultant as needed, depending on program activity requirements
- **Inspectors** – will be in addition to existing staff members to augment capacity as needed, contracted through existing consultant
- **Cost Estimators** – will be contracted out through existing consultant
- **Environmental Review Specialist** – will be contracted out through existing consultant
- **Administrative Assistant** – will be hired through the County Department of Community Development.

5.10 Internal and Interagency Coordination

Several departments within Richland County will share in the implementation responsibilities for the CDBG-DR grant, as described above in the Capacity section. However, the County Administrator's Office will be ultimately responsible for ensuring internal and interagency coordination and communication among the various departments. Coordination has already begun as evidenced by the response phase immediately after the floods in October 2015. As the programs evolve, it may be necessary to expand the responsibilities under any given department.

As a part of this process, department leaders have been informed of the types of responsibilities they will be tasked with under the grant. To the greatest extent possible, the County will standardize its processes and program templates so that each department is well versed in the logistics associated with each program activity. The County will develop a simplified work-flow of activities based upon the setup of each program to be codified in the policies and procedures manuals for each program. Upon program startup, department managers will establish timelines and milestones that will be communicated to each department head.



In addition to the interdepartmental cooperation that has already resulted in deployment of resources to affected citizens, the County has established both the Richland County Disaster Recovery Working Group (Working Group) and the Blue Ribbon Advisory Committee (Advisory Committee) to open communication channels and relationships that will support implementation of recovery activities. Both of these groups, more fully described below, will continue to provide critical services in development and implementation of CDBG-DR programs.

5.10.1 Richland County Disaster Recovery Working Group

The Working Group has provided oversight and strategic direction as we move through the Action Plan development process. The Working Group consists of representatives of the following local departments:

Departments	Offices (if applicable)
Building Codes and Inspections	
Business Operations	Geographic Information System (GIS) and Mapping Information Technology Procurement
Community Development	
Conservation	
Executive	Administration Public Information
Planning and Development	
Public Safety	Emergency Services
Public Works	Engineering Stormwater

The Working Group has participated in meetings on an approximately bi-weekly basis, and provides historical and local context to the disaster. This includes provision of any related data and information relevant to individual members’ areas of responsibility. The Working Group offers guidance related to their fields of expertise, assistance with public outreach, and participation in the development of programs and projects funded through the CDBG-DR program.

The Working Group also provides assistance to ensure that recovery activities are feasible and consistent with other local and regional efforts. When establishing goals and identifying recovery programs and projects, the Working Group verifies consistency with other planning and related departmental efforts.

5.10.2 Richland County Blue Ribbon Advisory Committee

The Advisory Committee consists of local stakeholders who form a diverse and knowledgeable representation of the County and various local communities. The Advisory Committee meets regularly and operates in an advisory capacity for the Working Group and County Council. The Advisory Committee includes representatives from stakeholder groups throughout the County, including:



Stakeholder Group	Sub-group (if applicable)
Richland County Government	Chair of Council Vice Chair of Council Assistant County Administrator Recovery Manager
Municipalities in County	Eastover Irmo Forest Acres Blythewood Arcadia Lakes
Gills Creek Watershed Association	
Sustainable Midlands	
Conservation Commission	
Volunteer Organizations Active in Disaster (VOAD)	United Way Lower Richland Ministerial Alliance
State Emergency Management	
Lower Richland County Representatives	
Underserved Populations Representatives	

The Advisory Committee was charged with helping to steer the overall direction of the Action Plan and ensuring that as many stakeholder groups and interests are included in the planning process as possible. Throughout the process, the Advisory Committee has supported public engagement strategies, identified unmet needs, and assisted with identification and prioritization of programs and projects proposed for CDBG-DR funding.

5.11 Technical Assistance

The County anticipates that the level of technical assistance will not be in high demand for this grant because the County will be administering the grant directly. However, we will coordinate with HUD to obtain contacts of technical assistance providers or engage a vendor, through formal procurement, should the need arise. To date, Richland County has benefitted from the HUD-provided technical assistance supporting implementation plan development.

Richland County’s staff will be provided with all training necessary to ensure that activities funded under this Action Plan are correctly administered. As mentioned before, the County has already hired an experienced CDBG-DR consultant to assist with the Action Plan process and Program Management and Implementation.

HUD-provided technical assistance to County leaders and department heads has been beneficial to date—outlining specific requirements of the Federal Register Notice along with guidance relative to best practices that should be considered by the County as it undertakes activities under the CDBG-DR program. Further, County staff members have attended HUD-provided training through the 2016 CDBG-DR webinar series, and have access to these resources, as well as the HUD CDBG-DR program management tools through the HUDExchange.info website. Finally, County staff members attended the July 27-28 DRGR training in Denver, Colorado.

The County plans to consult with HUD on an as-needed basis for general policy guidance or clarification of statutory requirements, though we do understand there are limited resources. Although the County anticipates that the disaster recovery grant will be managed out of the Columbia, South Carolina, HUD Field Office, we will



consult with both our Regional Field Office and HUD Headquarters in Washington, DC, as needed to seek solutions to issues.

Technical assistance will be provided to contractors and sub-recipients on a consistent basis to ensure they are up to date on the most current disaster recovery information and program requirements. This will be accomplished through training sessions, webinars, presentations, or other communication tools.

5.12 Accountability

RCCD is the administering agency for the CDBG-DR grant. Within the Department of Community Development, the responsible party for program oversight and implementation is the CDBG-DR Program Manager. The CDBG-DR Program Manager is responsible to the County Administrator's Office and HUD. The County Administrator is accountable to the Richland County Council and will report on activities directly. The Assistant County Administrator, who is tasked with program coordination among County agencies and other stakeholders, will report directly to the County Administrator.

The County Administrator will serve as authorized signatory of the contract between HUD and the County, will authorize major contracts, and will change orders. The Chief Financial Officer or County Administrator will certify to financial reporting, as appropriate for the reporting mechanism. The Chief Financial Officer at the Department of Finance will oversee compliance and monitoring, financial management, and oversight of the HUD line of credit, including management of timely expenditures.

The Director of Community Development will serve as the lead point of contact for HUD related to monitoring and compliance and issue resolution. The Deputy CDBG-DR Program Manager will oversee daily operations of the program, including applicant intake and eligibility, construction and contract management, policy and procedure, public information, and reporting, including management of the DRGR system.



SECTION 6. CERTIFICATIONS

Richland County makes the following certifications with this action plan:

- a. Richland County 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. Richland County certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. Richland County certifies that the action plan for Disaster Recovery is authorized under State and local law (as applicable) and that Richland County, and any entity or entities designated by Richland County, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. Richland County certifies that activities to be undertaken with funds under this notice are consistent with its action plan.
- d. Richland County 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. Richland County certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- f. Richland County 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 grant).
- 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 the method of distribution of funding, or activities carried out directly by the State.
- h. Richland County certifies that it is complying with each of the following criteria:
 1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2015 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.) related to the consequences of Hurricane Joaquin and adjacent storm systems, Hurricane Patricia, and other flood events.



2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (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. Richland County 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, Richland County certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
 - i. Richland County 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.
 - j. Richland County certifies that it has adopted and is enforcing the following policies, and, 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:
 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.
 - k. Each State or UGLG receiving a direct award under this notice 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 Richland County 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.



- I. Richland County 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.

- m. Richland County 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.

- n. Richland County certifies that it will comply with applicable laws.

A handwritten signature in blue ink, appearing to read "D. Decker", is written over a horizontal line.

Signature of Authorized Official

A handwritten date "9/15/16" in blue ink is written over a horizontal line.

Date

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"/>
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* 3. Date Received: <input type="text" value="09/19/2016"/>	4. Applicant Identifier: <input type="text"/>
--	--

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
--	---

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

8. APPLICANT INFORMATION:

* a. Legal Name: <input type="text" value="Richland County Government"/>	
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="57-6000398"/>	* c. Organizational DUNS: <input type="text" value="0737098830000"/>

d. Address:

* Street1:	<input type="text" value="2020 Hampton Street"/>
Street2:	<input type="text" value="Suite 3063B"/>
* 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 type="text" value="29204-1002"/>

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="Valeria"/>
Middle Name: <input type="text" value="Davis"/>	
* Last Name: <input type="text" value="Jackson"/>	
Suffix: <input type="text"/>	

Title: <input type="text" value="Director of Community Development"/>

Organizational Affiliation: <input type="text" value="Richland County Government"/>
--

* Telephone Number: <input type="text" value="803-576-2063"/>	Fax Number: <input type="text" value="803-576-2052"/>
---	---

* Email: <input type="text" value="jacksonv@rcgov.us"/>

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218;14.228

CFDA Title:

Community Development Block Grant Disaster Recovery

*** 12. Funding Opportunity Number:**

FR-5938-N-01

* Title:

Community Development Block Grant (CDBG) Disaster Recovery Grantees

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Single Family Housing Rehabilitation; Rental Rehabilitation; Business Assistance; Infrastructure and Administrative cost for projects impacted by the October 2015 floods of Hurricane Joaquin

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:
* a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
* a. Start Date: * b. End Date:

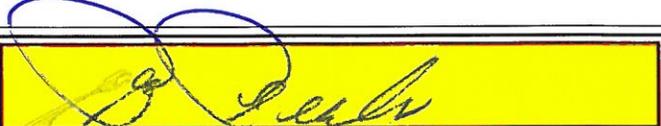
18. Estimated Funding (\$):

* a. Federal	<input type="text" value="23,516,000.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="23,516,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**
 a. This application was made available to the State under the Executive Order 12372 Process for review on .
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.
 c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**
 Yes No
If "Yes", provide explanation and attach

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)**
 ** I AGREE
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:
Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:
* Title:
* Telephone Number: Fax Number:
* Email:
* Signature of Authorized Representative:  * Date Signed:



SECTION 7. RESPONSE TO PUBLIC COMMENTS

Richland County published this Action Plan for a 24-day public comment period between August 26, 2016 and September 18, 2016. This CDBG-DR Action Plan was available for public comment on the flood recovery website (www.rcgov.us/floodrecovery) and at the Richland County Community Development Office, 1410 Laurens Street, Columbia, SC 29204. A summary of all comments received along with Richland County's responses are provided below.

Comment: There appears to be a typographical error on page 32 under the "CDBG Eligibility and National Objective" section. The second sentence refers to the SFHRP, but should refer to SRRP.

Response: This is a typographical error and has been corrected.

Comment: It appears that the columns in Table 1 do not add up to the totals listed.

Response: This is a typographical error and has been corrected.

Comment: In Section 3.2 "Basis for Funding Allocations" the plan describes administration costs as the costs to set up and manage the recovery programs. Is the list of provided inclusive of all work that will be paid for with the Administration money?

Response: The list of all tasks necessary to accomplish the delivery of CDBG-DR programs is quite extensive and varies between programs. Therefore, the list included in the Action Plan is not all-inclusive. We have updated the language in the plan to modify tasks listed and to clarify that the list includes, but is not limited to, the listed tasks.

Comment : Per the committee meeting today: Page 34 of the Action plan, Section 3.4.3 indicates that 16 homes will be assisted with the HMGP buyout match. I think this is a typographical error. Shouldn't this be 63?

Response: We have verified the number of projected projects to be served and updated accordingly.

Comment: For the rental program, a requirement should be that the landlord/owner must prove that they were denied traditional funding sources.

Response: We have re-evaluated the program criteria and updated the plan to include this requirement.

Comment: For the rental program, the maximum number of loans that any one landlord/owner should be able to receive from the program should be reduced from 4 to 1.



Response: We have evaluated this suggestion and revised the guidelines to indicate that only one loan will be available per property owner.

Comment: For the rental program, 100% of the benefit for this program should be to LMI individuals.

Response: This program is already designed so that 100% of the benefit will go to LMI individuals.

Comment 5: Twenty-eight properties assisted is a very low number. We would like to see more than 28 homes for renters assisted

Response: Twenty eight units is all that will be assisted with the current funding level of \$2,000,000 and assuming that each of the 28 rental homes assisted will require the full funding cap per unit. Twenty eight units is therefore, the target number of units to be served. Should some of the rehabilitation work not require the full funding cap per unit, funds will be available to assist additional rental units. The program funding levels will be evaluated throughout the project delivery and the final number of assisted units will be determined based on funds available.

Comment: How is this information being distributed to the rural communities with no internet access? Churches are the main source of information in some of these communities. What are you doing to make sure that this information is distributed widely to reach those in the rural areas?

Response: The County is using the Public Information Officer to distribute public service announcements. Information is posted to the flood recovery website, www.rcgov.us/floodrecovery. The County is developing a targeted outreach plan for digitally disconnected communities that will be implemented to get the word out when the programs open for intake. We have conducted ten (10) public outreach meetings across the County that were all publicized. We have conducted four (4) stakeholder meetings with civic and business organizations that were all publicized. County Councilmen have also publicized these events within their districts. Social media publicity has also been engaged.

Comment: For the rental program, when assisting structures with 2-4 units, should be required that the entire structure must have the same owner (single owner must own all units in the structure).

Response: As designed, the rental program currently will require that the entire structure to be assisted will be owned by the same owner(s)--i.e, every unit within the structure must be owned by a single owner.

Comment: On page 33, under the "Grant Size Limits" section, the first sentence indicates that the maximum award cap is based on the number of bedrooms. However the next sentence indicates that the award will depend on the storm damage to the structure.



Response: This was a typographical error and has been corrected to read: “ Award amounts under the Small Rental Rehabilitation Program will depend upon the amount of storm damage and the cost of rehabilitation up to the maximum award amount .”

Comment: In the rental program, it says “Single Family, detached dwellings only are eligible for assistance and must contain between one and four bedrooms. Condominiums, townhomes, duplexes, triplexes or four-plexes, mobile homes, recreational vehicles, and boats are not eligible.” We have many small rental properties where an owner may live in one unit and rent out the rest of their units in their structure. Restricting rental properties to single family detached dwellings will mean that many people won’t even have the opportunity to apply.

Response: The funding for all of our housing programs is extremely limited. Richland County understands that the funds available will not be enough to assist every property owner. Currently we anticipate serving 28 properties under the rental program. However, we have reconsidered our position on eligible structure types to accommodate properties that are duplexes, triplexes and quadplexes. These will be eligible structure types if the units are all under a common roof, all units are owned by the same owner(s), and 100% of the units serve LMI individuals. The exception to the 100% rule will be where one unit in the structure is owner-occupied. The owner-occupied unit will not be required to be LMI unless the owner vacates the unit and turns it into a rental unit. Condos, townhomes, mobile homes, recreational vehicles and boats are still not eligible structure types under this program. The rehabilitation cap amount applies to the entire structure and will not be increased on a per unit basis.