

**RICHLAND COUNTY  
COMMUNITY DEVELOPMENT BLOCK GRANT  
DISASTER RECOVERY PROGRAM (CDBG-DR)**

**ACTION PLAN AMENDMENT # 1**

October 2, 2017

**OVERVIEW**

Richland County received HUD approval for its CDBG Disaster Recovery Action Plan on November 16, 2016 (Public Law 114-3). The Action Plan described the allocation of \$23,516,000 to programs designed to address unmet needs resulting from the October 2015 Storm/Flood Event, primarily focusing on rehabilitation of single family residences that meet low to moderate income criteria along with infrastructure and commercial business needs. This is the first Action Plan Amendment requested by Richland County and is in accordance with the requirements established by HUD in Federal Register dated August 7, 2017(Public Law 115-31), which allocates an additional \$7,254,000 to Richland County for disaster recovery assistance.

The Action Plan Substantial Amendment (#1) will be made available via Richland County’s Disaster Recovery website (Returning Home) at <http://rcgov.us/floodrecovery>. Two public meetings describing program modifications and additions were held on October 12 and 16, 2017 at Decker Center, 2500 Decker Blvd; and Garners Ferry Adult Activity Center (8620 Garners Ferry Road) respectfully, both from 5:30-7:00 pm. A Public Notice announcing the meeting was advertised on our County website, The State Newspaper, marketed advertisement to the digitally disconnected and other local media outlets. Written comments on the proposed Action Plan Amendment will be accepted via U.S. mail; hand delivery to the Community Development Department or CDBG-DR Flood Recovery Office located at 2020 Hampton Street, Columbia SC and on the *Returning Home* website for 14 days from October 2, 2017 through close of business October 16, 2017. All comments will be given the same consideration regardless of the method of submission.

**Initially, 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.

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

	<b>Table 1 – Unmet Needs Summary</b>	<b>Assistance Received/Anticipated</b>	<b>Unmet Need</b>
	<b>Damage/Need</b>		
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**

This Substantial Amendment (#1) describes the status of current programs, and provides justification for the additional allocation funding to address unmet safe, sanitary and affordable housing needs. After the initial appropriation of \$23,516,000.00, the County reassessed the unmet needs and determined an additional \$57.5 million would be needed to meet the challenges of the October 2015 flood event. The 2<sup>nd</sup> allocation approved was \$7,254,000.00.

The County’s application methodology included a specified and advertised 30-day intake period: May 15, 2017 to June 15, 2017. In addition, a prioritization was completed using qualifiers such as very low income; disabled house member; elderly; life-threatening conditions, etc. This produced a ranking scale of IA1’s to IA7’s. The highest priorities were established for 1A1’s - 1A3’s.

As of 8/30/17, the below reflected the single family housing intake status:

### CDBG-DR SFR Intake Status



Priority	Stick Built	Mobile Home	Total
1A1	31	9	40
1A2	89	41	130
1A3	97	26	123
1A4	25	6	31
1A5	17	5	22
1A6	21	2	23
1A7	8	3	11
1B	19	4	23
1C	19	3	22
2	73	3	76
Ineligible	74		575

Richland County Blue Ribbon Committee

13

### Outreach to the Public/Citizen Participation Plan

Between January and June, 2017, the County hosted 20 individual public outreach sessions attended by approximately 200 residents; press releases were sent local media organizations and interviews were conducted by several television and radio stations; a notice of the initial public information meeting was posted on Twitter, Facebook and YouTube; program information was posted on the *Richland Weekly*.

Several orchestrated and detailed steps were taken to ensure maximized outreach potential. In addition, several partnerships were encouraged and exercised:

## Outreach Overview - Canvassing



Volunteer Groups	Areas to Canvass
Elevation Youth Development Outreach, Inc	Lower Richland
Alpha Phi Alpha Fraternity	Decker Blvd./International Corridor
Creating Miracles Corp.	Hopkins/St Andrews
Richland County Recreation Commission Adult Activity Center	Parklane Road
SC Hispanic Outreach	Arlington St./Muller Avenue
PASO's	Devine Street
Local Churches	Their congregation
VOADs	Their clients
Council Members & Key Stakeholders	Their respective areas of Richland County

Flood Recovery Finance & Coordination Meeting

16

Overall, several community meetings were held from January 2017 - June 2017. Six Public Outreach Meetings to inform citizens of proper application completion were held in various locations throughout the County between May 1<sup>st</sup> and May 11<sup>th</sup>. County Intake Centers were established during the May 15-June 15<sup>th</sup> intake period throughout the County as well. A total of 600 applications were anticipated by May 18<sup>th</sup>. However, less 200 applications were submitted within the first 3 days. One last set of application meetings were held in June prior to the June 15<sup>th</sup> deadline. The final step along with a two-pronged approach assisted Richland County to meet its goal: Direct Door-to-Door Home Visits and Direct Residential Phone Calls.

The County's goal was to secure 600 pre-applications and the county neared its mark by receiving a total of 575 applications during this intake phase. During the eligibility review process 74 applicants have been found to be ineligible to date due to items such as location being either the City of Columbia or Lexington County or withdrawn.

### County Methodology for Project Selection for New Allocation

Approximately \$10M of original allocation was budgeted for single family households, inclusive of stick built, mobile homes and rental rehab. The other projects were earmarked for commercial smaller business and infrastructure needs along with Planning and 5% Administration.

CDBG-DR Applications were taken during the open window of May 15-June 15, 2017. There are an additional 27 applicants who have expressed interest and provided applicants after the deadline that could be processed during the new open enrollment with the additional \$7.254M. In order to permit the processing of new applicants and those who submitted after the initial allocation SFHRP intake deadline date, the County intends to open another 30 day intake period for the SFHRP.

The application submissions would work similar to the existing streamlined prioritization process using the same qualifiers. While the County does not expect a low outcome, in the event this method did not yield the applications to support the substantiated breakdown of funding for housing project, the County would incorporate another amendment to reassess and redirect the funding to meet the goals of HUD and the needs of Richland citizens.

As of 9/28/17, the below reflects the County's statistical application CDBG-DR data:

- All 575 applicants have been notified of their status in the flood recovery program
- Contacts have been made to all 192 1A1 and 1A2 applicants
- 171 completed initial consultations by the case manager with the applicants providing verification
- 55 verified applications
- Processed ranking of twelve (12) 1A1 applications, twenty-seven (27) 1A2 applications, and sixteen (16) 1A3 applications
- Total of 101 completed construction walks with Cost Estimators/Inspectors
- 86 Tier II Field Inspections Completed

The need for housing was great and thus, the County budgeted approximately 60% of the original \$23M programmatic allocation to Housing. Richland County is 'uniquely urban, uniquely rural'. To that end, the county structured a major housing program to cover four (4) housing needs:

- Single Family Owner-Occupied Rehabilitation
- Mobile Home Unit Replacement
- Small Rental Rehabilitation
- Buy Out Program in tandem - Hazard Mitigation Grant Program (HMGP) Match 25% CDBG-DR to 75% FEMA

With the requests for assistance, the predominance of need still resides within the Single-Family Owner-Occupied Rehabilitation section of the program.

## **SUMMARY OF CHANGES**

Pursuant to the Grant Amendment Process identified in the Federal Register Notice of August 7, 2017, Richland County has consulted with citizens, stakeholders, local government agencies and United Way's Midland Recovery Group and others to determine updates to its needs assessment. All comments have been incorporated in preparing this Action Plan Amendment Number 1, which allocates \$6,891,300 or 95% in new funding not identified in the approved Action Plan and

proposes the following program additions and modifications. In addition 5% or \$362,700 of the new allocation would be utilized to administer the secondary allocation.  
Pages 32-35 of the Richland County Action Plan (original Action Plan):

### 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. Rehabilitation may be offered to applicants based on the extent of damage to the home. Replacement of MHUs 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 is indicated, a standard floor plan option will be offered. If a replacement home is provided, the original MHU 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, and mobile home units (MHU). 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 \$65,000. 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

The County reserves the right to make exceptions to the grant size limits in cases involving health, safety and/or humanitarian issues. These will be addressed 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 200 homes through the SFHRP.

**ACTION PLAN AMENDMENT NUMBER 1 REALLOCATION OF FUNDS**

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

<b>APPROVED ACTION PLAN PROGRAM</b>	<b>TOTAL BUDGET ALLOCATION</b>	<b>INITIAL BUDGET ALLOCATION</b>	<b>2<sup>ND</sup> BUDGET ALLOCATION (PROPOSED)</b>	<b>TOTAL NUMBER OF IMPACTED PROPERTIES</b>
Administration (5%)	\$1,537,700	\$1,175,000	\$362,700	
Planning (15%)	3,500,000	3,500,000	0	
Single Family Owner Occupied Program	11,617,704	7,620,750	3,996,954	140
HMGP Match – Homeowner and Commercial Buyout Program	1,680,000	1,680,000	0	63
Small Rental Repair Program	2,000,000	2,000,000	0	28
Mobile Home Replacement Units	5,434,596.00	2,540,250	2,894,346	60
Infrastructure	3,000,000	3,000,000	0	2
Small Business Assistance Program (BAP)	2,000,000	2,000,000	0	14
<b>Total</b>	<b>\$30,770,000.00</b>	<b>\$23,516,000.00</b>	<b>\$7,254,000.00</b>	<b>307</b>

**Monitoring**

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

**The CDBG-DR Program for Richland County has a sunset date of June 30, 2022 for the full execution of the total \$30,770,000.00.**

## Additional Amendment Items to Provide Clarification or Revisions to Programs

In addition to the revisions required to address the allocation of additional CDBG-DR funds, Richland County is also amending the Action Plan to address programmatic changes and to provide additional information or clarification for specific items described in the Plan. A summary of each change as well as a copy of the actual text change within the Action Plan are provided below.

**Pg. 13** - Update 2016 income limits with 2017 income limits.

FY 2017 Income Limit Area	Median Income	FY 2017 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Richland County	\$64,100	Extremely Low Income Limits	\$14,100	\$16,100	\$18,100	\$20,100	\$21,750	\$23,350	\$24,950	\$26,550
		Very Low (50%) Income Limits	\$23,450	\$26,800	\$30,150	\$33,500	\$36,200	\$38,900	\$41,550	\$44,250
		Low Income (80%) Limits	\$37,550	\$42,900	\$48,250	\$53,600	\$57,900	\$62,200	\$66,500	\$70,800

**Pg. 32** – Remove modular home reference since modular homes are no longer eligible structures for homeowner or rental rehab. Remove reference to multiple floor plan options for MHU and modular replacement.

“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 is~~ indicated, a 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.”

**Pg. 34** – Remove modular home reference on 10<sup>th</sup> bullet point.

“Property must be an eligible structure under the SFHRP. Eligible structures for the SFHRP include single unit, single family stick-built dwelling units, and 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. “

**Pg. 35** – Remove then grant size limit description for modular homes and increase MHU replacement grant limit to \$65,000 in order to meet the contract requirement with the MHU vendor. Include a reference to allow for grant limit exceptions for health, safety and humanitarian issues.

**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 \$650,000. 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.”~~

The County reserves the right to make exceptions to the grant size limits in cases involving health, safety and/or humanitarian issues. These will be addressed on a case-by-case basis.

**Pg. 37** – Remove 4<sup>th</sup> bullet point referencing modular homes

~~“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.”~~

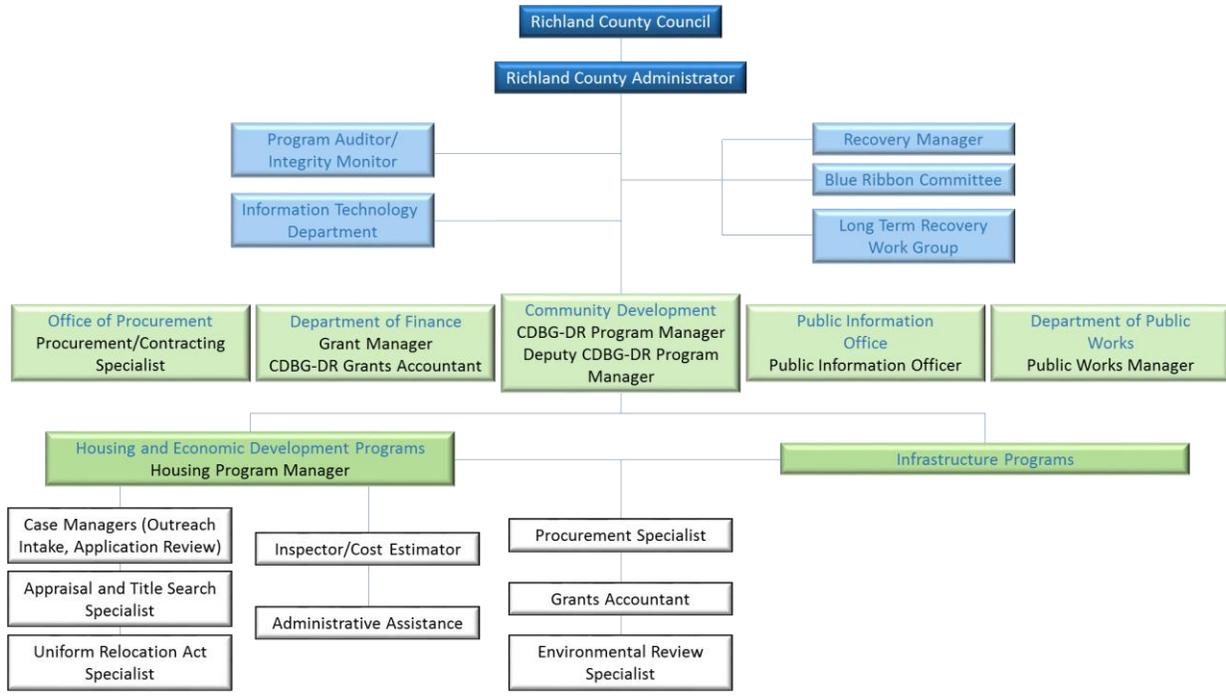
**Pg. 73** - Remove the reference to sending electronic notifications to participants regarding critical milestones since email is not a reliable method for communicating amongst a majority of the participants.

- 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~~

**Pg. 76** – Revise organization chart as described below:

- Merge Inspector and Cost Estimator positions



**Pg. 77** – Merge Inspector and Cost Estimator positions identified in the positions to be hired.

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
- **Procurement Specialist** – will be hired through the Department of Community Development or contracted through existing consultant
- **Grants 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/Cost Estimators** –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

**Pg. 35** – Clarify that the Small Rental Rehabilitation Program is only applicable to stick built structures since it is rehab only.

**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), stick built rental housing in the disaster-impacted areas to applicable construction codes and standards.

**Pg. 36** – Remove elderly and vacant properties as priority criteria for rental rehab program in order to allow for great program flexibility and permit a more efficient application intake and processing.

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.~~

**Pg. 37** – Modify verbiage to clarify that the disqualification for existing liens does not include existing mortgages and that the County will take second position behind an existing mortgage.

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 except for existing mortgages in which case the County will take second position behind the mortgage.
- 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

**Pg. 38** – Remove elderly and vacant properties as priority criteria for rental rehab program in order to allow for great program flexibility and permit a more efficient application intake and processing.

**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. Applicants will be prioritized and reviewed on a first-come-first-served basis.

**Pg. 39** – Remove reference to individual household income verification since area low-moderate income area benefit will be used for eligibility.

**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 area benefit or Urgent Need objective. Properties to be acquired, demolished, cleared and maintained as open space for the beneficial use of persons in LMI qualified areas will be found eligible under the LMI area benefit criteria. The remaining households which have met the requirements of HMGP, buyout eligibility have been found to be qualified as eligible under the urgent need criteria by HUD. 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.

**Pg. 38** – Include a reference to grant limit exceptions for health, safety and humanitarian issues.

The County reserves the right to make exceptions to the grant size limits in cases involving health, safety and/or humanitarian issues. These will be addressed on a case-by-case basis.

**Pg. 39** – Remove primary residency eligibility requirement for HMGP Residential Match Buyout in order to conform with HMGP guidelines.

**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 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.